Chapter 4: Agricultural Resources

A. INTRODUCTION AND SUMMARY OF FINDINGS

This chapter analyzes the potential impacts of the Proposed Action on agricultural uses on the Site, including the ability of the Site to be used for agricultural activities in the future, and compares the potential for productive farming uses of the Site under existing conditions and under the Proposed Action.

As summarized below and demonstrated in the detailed analyses that follow, the Proposed Action is consistent with existing agricultural uses on the Site and surrounding area, is consistent with several goals and objectives of relevant local and regional policies on agriculture, and would not meaningfully reduce the amount of land available for agricultural uses on the Site or result in fragmentation of a "known and identified critical [mass] of farmland" (See NYSDEC FEAF Workbook re: Part 2, Question 8.)[1] Consistent with the final Scoping Document (see **Appendix 1**), the analysis considered relevant policy guidance from state, county, local, and other sources, including the Cornell Cooperative Extension's 2022 Agricultural Profile for Amenia, the Dutchess County Agricultural and Farmland Protection Plan, and the Town Comprehensive Plan.

The agricultural analysis in this chapter responds to the following issues identified during the DEIS scoping process: (1) potential impacts to crop farming and agricultural soils from the subdivision and future buildout; (2) the viability of small-parcel farming on the proposed residential-agricultural lots; (3) the enforceability of the Declaration's agricultural use requirements; and (4) consistency with the Town Comprehensive Plan, the Dutchess County Agricultural and Farmland Protection Plan, and the Cornell Cooperative Extension's 2022 Agricultural Profile for Amenia. These issues were identified in written comments and oral testimony submitted during the public scoping session held October 22, 2025, and in written comments received through October 29, 2025. The analysis in this chapter directly addresses each of these issues.

The Cornell Cooperative Extension's *Dutchess County 2022 Agricultural Profile for Amenia* (the "Profile")[2] documents that the Town contains 27,951 total acres, of which 18,516 acres—across 285 farm parcels—are in active agricultural use. The Conceptual Future Buildout Scenario would result in the conversion of less than two-tenths of 1% (0.2%) of the Town's farmland to residential use, while permanently protecting the rest of the Site, and would not adversely affect the agricultural character of the Town of Amenia.

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[1] NYSDEC, *FEAF Workbook*, available at https://dec.ny.gov//regulatory/permits-licenses/seqr/eaf-workbooks/part-2-feaf/question-8.

[2] Cornell Cooperative Extension Dutchess County, *2022 Town Agricultural Profiles*, available at https://ccedutchess.org/agriculture/2022-town-agricultural-profiles.

The Proposed Action would, under the Declaration, restrict the use of two large lots for continued equestrian and agricultural use (Lots K-1 and K-2); restrict the use of the portion of each of the 23 residential-agricultural lots outside the RDA of each lot (i.e., the designated Agricultural Area of each lot as defined in the Declaration) solely to agricultural use or open space; promote continued agricultural use of those lots (and thereby of the Site) and the diversification of agricultural uses, (i.e., the development of small-parcel farming on those lots); and limit residential structural development to less than 1% of the overall Site. Given these measures, the Proposed Action would protect existing agricultural resources; would not result in fragmentation of a "known and identified critical [mass] of farmland"; would not adversely "impact…the ability of farmers in an Agricultural District to keep farming" by "construction of commercial and residential structures, new roads, and removal of soil" that would "irreversibly convert agricultural lands so that they cannot be farmed again in the future"; and, as discussed above, would not adversely affect the agricultural character of the Town. The Proposed Action would also support the positive trends identified in Cornell Cooperative Extension's 2022 Agricultural Profile for Amenia and would advance the vision, goals, and initiatives of the Dutchess County Agricultural and Farmland Protection Plan.

B. EXISTING CONDITIONS

SITE

The Site is currently used for and improved with existing residential buildings, equestrian facilities, paddocks, and other agricultural uses (see **Figure 4-1**). The northwestern area of the Site, as well as portions of the eastern and southern areas of the Site, are farmed for row crops. The southwestern portion of the Site contains 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 dominated by forested land, with areas of brush interspersed. There are a few ponds/interconnected wetland complexes on the central/eastern portions of the Site, as well as a wetland area in the northwestern corner. The Site also contains agricultural soils and areas of steep slopes. **Table 4-1** presents the acreages of land cover on the Site. As shown in the table, row crops comprise 223.6 acres (37.0%) of the Site, and paddocks comprise 167.7 acres (27.7%) of the Site. A substantial portion of the Site, 159.4 acres (26.3%), is forested.

Table 4-1
Site Existing Land Cover

Land Use	Acres
Row Crop	223.6
Brush	23.1
Forest	159.4
Wetland	17.7
Paddock	167.6
Impervious Surfaces	5.3
Grass	7.1
Waterbody	1.9
Total	**605.7**

Sources: Rennia Engineering Design, PLLC

The Site is located within Dutchess County Agricultural District #21, the County's sole Agricultural District,[3] which contains over 195,945 acres (see **Figure 4-2**).[4] The key purpose of Agricultural Districts, which are created pursuant to Article 25-AA of the New York Agricultural & Markets Law are to protect and promote land for farming and agricultural purposes, by providing a framework to limit conflicts between farm and non-farm uses and support agricultural production across the County.[5]

The Site contains Prime Agricultural Soils ("PAS") and Soils of Statewide Importance ("SSI"). PAS are those soils mapped by the U.S. Department of Agriculture ("USDA") Natural Resources Conservation Service as "Prime Farmland" in the USDA soil survey.[6] Such soils generally have an adequate and dependable water supply, a favorable temperature and growing season, good drainage and permeability, and low erosion risk. The Site contains the several PAS, including CuB (Culver silt loam, 3 to 8%), GsA (Georgia silt loam, 0 to 3%), GsB (Georgia silt loam, 3 to 8%), MnB (Massena silt loam, 3 to 8% slopes), and SkB (Stockbridge silt loam, 3 to 8%).

SSI are soils identified in the USDA soil survey that, while not classified as PAS or Prime Farmland, are considered by a state to be important for agricultural production and capable of producing high crop yields when properly managed. The Site contains several SSI including SkC (Stockbridge silt loam, 8 to 15%), GsC (Georgia silt loam, 8 to 15%) and CuC (Copake gravelly silt loam).

The majority of the Site's PAS and SSI are located outside the RDAs. See **Figure 4-3** for a map showing PAS and SSI on the Site. The total acreages of soils categorized as SSI and PAS on the Site are provided in **Tables 4-2** and **4-3**, respectively.

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[3] In 2023, as part of the County's required 8-year agricultural review, the Dutchess County Agricultural and Farmland Protection Board recommended consolidating the County's then four (4) districts (Agricultural Districts 20, 21, 22, and 23) into one district—Agricultural District 21. That recommendation was adopted in late 2023. See https://www.dutchessny.gov/NovemberEnvironment2023.pdf.

[4] Dutchess County Department of Planning and Development, *Agricultural District Maps (2025),* available at https://www.dutchessny.gov/Departments/Planning/Docs/AgDistrictsMap_2025_09_WEBSITE.pdf.

[5] New York State Department of Agriculture and Markets, *About Agricultural Districts*, available at https://agriculture.ny.gov/land-and-water/about-agricultural-districts

[6] United States Department of Agriculture Regulations, 7 CFR § 657.5(a), available at https://www.law.cornell.edu/cfr/text/7/657.5.

Table 4-2
Soils of Statewide Importance

Soil Type	Acres
Stockbridge Silt Loam, 8 to 15 Percent Slopes (SKC)	181.5
Copake Gravelly Silt Loam, Rolling (CUC)	13.8
Georgia Silt Loam, 8 to 15% Slopes (GSC)	22.8
TOTAL	**218.1**
Sources: Rennia Engineering Design, PLLC	

Table 4-3
Prime Agricultural Soils

Soil Type	Acres
Copake Gravelly Silt Loam, Undulating (CUB)	1.8
Georgia Silt Loam, 0 to 3 Percent Slopes (GSA)	0.5
Georgia Silt Loam, 3 to 8 Percent Slopes (GSB)	59.7
Massena Silt Loam, 3 to 8 Percent Slopes (MNB)	33.7
Stockbridge Silt Loam, 3 to 8 Percent Slopes (SKB)	30.0
TOTAL	**125.7**
Sources: Rennia Engineering Design, PLLC	

TOWN OF AMENIA

A large portion of the Site is within the RA District, and in the Town, approximately 74% of Town land is within the RA District (see Chapter 3, “Land Use, Zoning, and Community Plans”). The purpose of the RA District 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 RA District was established to encourage the continuation of agriculture and preservation of open space in the Town. The RA District aims to avoid unreasonably restricting or regulating farm structures or farming practices while supporting agricultural operations and other economic activities requiring large contiguous open space areas. The RA District also aims to protect prime and statewide important agricultural soils and maintain the Town's rural landscape by encouraging open space development options. The RA District supports the Town's vision of a diverse community with agriculture as a fundamental component, protecting agricultural lands from incompatible development while allowing flexibility for farmers and landowners.

The RA District prioritizes agricultural operations and low-density residential uses. Agricultural uses, farm operations, and related activities are strongly supported without unreasonable regulation, consistent with New York State Agricultural District protections. Conservation subdivisions, density transfers, and limited development subdivisions all require Planning Board special permits and must satisfy conservation analysis requirements

identifying agricultural soils, ecological resources, and other conservation values. As discussed in Chapter 3, “Land Use, Zoning, and Community Plans,” the Proposed Action has been designed to comply with the Site’s zoning.

Furthermore, the Town Comprehensive Plan recognizes that traditional dairy farming is on the decline and that a more diversified farm industry is emerging in the Town, including horse farms, sheep farms, organic vegetable farming, and raising other animals and crops for specialized niche markets.

As noted in the Town Comprehensive Plan:

> *Agriculture remains a viable part of the economy as it makes the transition from traditional dairy farming to more profitable niche markets, while adding value to all of the property in Amenia.* (Comprehensive Plan, page 22)
>
> *It is anticipated that the decline in traditional farming will continue, although some of it will be replaced by horse farming and specialized niche agriculture.* (Comprehensive Plan, page 50)

As discussed in Chapter 3, “Land Use, Zoning, and Community Plans,” the Profile identifies that Amenia has 285 farm parcels comprising 18,516 acres of the Town's 27,951 total acres, meaning that approximately 66.2% of the Town is in active agricultural use—one of the highest percentages of any municipality in Dutchess County. This statistic underscores the central role that agriculture continues to play in defining the Town’s character, economy, and landscape. The average size of agricultural parcels in the Town is 66 acres.

The Profile documents that the amount of land in the Town within Agricultural District 21 has increased by 1,762 acres (10%) from 2008 to 2022, demonstrating that, despite development pressures, the Town has succeeded in expanding rather than contracting its agricultural land base. This growth trend stands in contrast to many communities in the region where farmland is lost to development, reflecting the Town’s policy choices and successful implementation of farmland protection strategies including conservation easements, agricultural district enrollment, and land use regulations that support continued farming.

In the Town, production agriculture (e.g., hay, corn, and field crops) represents the largest segment by acreage in the Town, with farm operations on 10,050 acres of property, followed by dairy operations on 1,875 acres, and horses (boarding and private farms) on 1,270 acres, representing another significant category (see **Table 4-4**).

Table 4-4
Acreage Distribution by Farm Enterprise Type (2022)

Farm Enterprise Type	Acreage	Percentage of Total Farm Enterprise Acreage
Production Agriculture*	10,050	55.6
Dairy	1,875	10.4
Other**	1,862	10.3
Buffer***	1,520	8.4
Horses	1,270	7.0
Specialty Crops****	782	4.3
Beef and Livestock	702	3.9

Notes: * Hay, Corn, and Field Crops (other grains and row crops)
** Primary operation does not correspond to a common type (e.g., timber, small fruits), or in which multiple farm enterprises were provided, and a single one could not be determined
*** Vacant, residential, or open space parcels that border farm property and/or contain farmland soils that could be developed for farming operations
**** Hort. Specialties (e.g., flowers), Christmas trees, orchards, vegetable farms, and vineyards
Sources: Cornell Cooperative Extension's *Dutchess County 2022 Agricultural Profile for Amenia*

As discussed in the Town Comprehensive Plan, "Amenia's agriculture is its longest surviving industry, [h]owever farming has been in decline in recent decades" (Town Comprehensive Plan, page 64). As dairy farming has decreased, other forms of agriculture developed in the Town, including "horse, beef and sheep farms as well as vineyards, nurseries, and other cash crops" (Town Comprehensive Plan, page 65). The Town Comprehensive Plan also noted that "one of the trends in agriculture in Dutchess County is towards specialization into niche products that take advantage of local or New York City markets" (Town Comprehensive Plan, page 65). The Town Comprehensive Plan describes agriculture in the Town as being "in transition" (Town Comprehensive Plan, page 66) with trends including an increase in smaller-scale and specialty agriculture (as proposed by the Applicant), and growth in equine uses. The Town Comprehensive Plan suggests that, "if Amenia is to remain a Town of open fields and natural areas, agricultural preservation is critical. The preservation of agriculture requires, in particular, emphasis upon maintaining "prime farmland soil" in large, contiguous parcels." (Town Comprehensive Plan, page 66)

Regarding soils, the Town Comprehensive Plan notes that "many of the same characteristics that make soils prime for agriculture uses…also make them appropriate for urban uses" (Town Comprehensive Plan, page 72). It then goes on to observe that "in Amenia, pressures to sell farmland for residential development are slowly increasing. Long-term farmers also face competition from new uses such as horse farms and those for whom farming is not their primary source of income. While the last two trends affect the way of life the Town has known for many years, they do not develop the agricultural soils for urban or suburban type uses. Such uses are the greatest challenge to preserving the open space character of the community" (Town Comprehensive Plan, page 72).

The *Dutchess County* AAFPP [7] also offers insights into the state of agriculture in the Town and County. As noted in the AAFPP, "the highest concentration of farmland in Dutchess County occurs in the Northeastern towns, including Amenia…which have farmed parcels that

[7] Dutchess County Planning Department, *Agricultural and Farmland Protection Plan*, available at https://www.dutchessny.gov/Departments/Planning/Agricultural-Plan-Actions.htm.

account for more than 50% of their land area" (noting that this does not mean that 50% of the Town is in active agriculture) (AAFPP, page 24).

The AAFPP (pages 40-41) provides historic data from the Cornell Cooperative Extension for 2014; a comparison of the 2014 data against the 2022 data presented above (in **Table 4-4**) identifies changes in agricultural uses in the Town over that period (see **Table 4-5**).

Table 4-5
Acreage Distribution by Farm Enterprise Type (2014, 2022)

Farm Enterprise Type	Acreage (2014)	Acreage (2022)
Production Agriculture*	7,194	10,050
Dairy	3,275	1,875
Other**	2,110	1,862
Buffer***	1,950	1,520
Horses	1,763	1,270
Specialty Crops****	351	782
Beef and Livestock	1,472	702

Notes: * Hay, Corn, and Field Crops (other grains and row crops)
** Primary operation does not correspond to a common type (e.g., timber, small fruits), or in which multiple farm enterprises were provided, and a single one could not be determined
*** Vacant, residential, or open space parcels that border farm property and/or contain farmland soils that could be developed for farming operations
**** Hort. Specialties (e.g., flowers), Christmas trees, orchards, vegetable farms, and vineyards
Sources: Cornell Cooperative Extension's *Dutchess County 2022 Agricultural Profile for Amenia* (2022 data); Dutchess County *Agricultural and Farmland Protection Plan* (2014 data)

As demonstrated by the comparison between 2014 and 2022 acreages of farm operations in the Town, production agriculture uses grew in acreage by nearly 40%, and specialty crops grew by approximately 122%. Over the same period, land devoted to dairy uses declined by nearly 43%, land devoted to horse operations declined nearly 28%, and land devoted to beef and livestock declined by over 50%.

DUTCHESS COUNTY FARMING CONDITIONS AND TRENDS[8]

Every eight years, the Dutchess County Agricultural and Farmland Protection Board ("AFPB") provides a report to the Dutchess County Legislature on farming within the County. The AFPB's *2023 Agricultural District 8-Year Review* offers key observations about agricultural trends in Dutchess County. The report identifies general trends in

County agriculture over the past 40 years, noting that the number of farms has increased while their average size has decreased (see **Table 4-6**):

[8] Dutchess County Department of Planning and Development, *2023 Agricultural District 8-Year Review: Report to the Dutchess County Legislature,* available at https://www.dutchessny.gov/Departments/Planning/Docs/DutchessCounty_AgDistrict_CertificationProcess_2023.pdf.

Table 4-6
Agricultural Trends, Dutchess County

Year	Number of Farms	Total Acres	Average Acreage per Farm
1974	568	136,000	239
1987	613	124,000	203
1992	554	110,000	198
1997	539	106,000	198
2002	667	112,000	168
2007	656	102,000	156
2012	678	112,000	166
2017	620	101,948	164
Sources: AFPB 2023 Agricultural District 8-Year Review.			

The report also identifies the sizes of farms throughout the County, as shown in **Table 4-7**. Notably, 15% of farms are 9 acres or smaller, and 38% of farms are between 10 and 49 acres in size. The majority (53%) are smaller than 49 acres.

Table 4-7
County Farms by Size

Farm Size (acres)	Number of Farms	Percentage of All Farms
1 to 9	96	15
10 to 49	233	38
50 to 179	170	27
180 to 499	76	12
500 to 999	23	4
1000+	22	4
TOTAL	**620**	**100%**
Sources: AFPB 2023 Agricultural District 8-Year Review		

C. FUTURE WITHOUT THE PROPOSED ACTION

Absent the Proposed Action, the Site would not be subdivided, and the existing agricultural and equestrian operations on the Site are expected to remain. Any future development on the existing 2 lots, including residential development, would be subject to the use and dimensional requirements of the Site's zoning. The Applicant is not aware of any known or potential changes to the Site absent the Proposed Action.

Under existing RA and RR District regulations, the Site could be developed at significantly greater density than the Proposed Action. A conventional subdivision compliant with RA District minimum lot size (10 acres) and unencumbered by the Declaration could yield up to 48 residential lots without the development restrictions of the Declaration. A conservation subdivision could yield an even greater number of units through density transfer. In the absence of the Declaration, residential development of the Site at the maximum yield permitted by the Town Zoning Code would result in substantially greater conversion of agricultural soils to residential use than the Proposed Action.

Any future development of the Site, including residential development, would be subject to the use and dimensional requirements of the Site's zoning, including SPO District, SCO District, RDO District, and AQO District requirements.

The Applicant is not aware of any pending legislation or other Town actions that would result in changes to, or conversion of, agricultural lands in the Town.

As noted in the Profile, the Town has seen a shift from traditional farming uses such as large commercial dairy farms and large monocropping operations (hay and field crops) toward an increase in the number of specialty crops, equestrian operations, horse farms, smaller-scale diversified farming, and other diversified practices, reflecting changing market dynamics and the emergence of new agricultural opportunities. This trend is anticipated to continue in the future without the Proposed Action. As discussed in Chapter 3, “Land Use, Zoning, and Community Plans,” the Town Comprehensive Plan notes an overall change in land use patterns prompted by the creation of various subdivisions coupled with a decline in acreage devoted to active farms. Land use surveys were conducted during the creation of the Town’s 1968 Comprehensive Development Plan and the 1991 Master Plan; those surveys identified a 25% decline in the amount of land devoted to agriculture between 1968 and 1991, and a further 12% decline between 1991 and 2008. However, the Town Comprehensive Plan also notes that “Amenia still has significant amounts of land to develop” (Town Comprehensive Plan, page 50).

Thus, in the future without the Proposed Action, it is anticipated that the general agricultural trends in the Town and County, as discussed above, would continue. This includes the specialization of farms to produce niche products, an increase in smaller-scale agriculture, and a growth in equine uses.

The potential future sale or transfer of the Site to a new owner could result in a continuation of the current agricultural uses, a change in agricultural enterprise type, or a decision to cease all agricultural uses and pursue the maximum residential development permitted by zoning. None of these outcomes can be ruled out in the future without the Proposed Action.

D. FUTURE WITH THE PROPOSED ACTION

In the future with the Proposed Action, the Site’s two existing lots would be subdivided into a total of 27 lots, including 23 residential-agricultural lots; 2 existing equestrian lots (Lots K-1 and K-2); and 2 forest Conservation Lots (Lots F-1 and F-2).

The 23 residential-agricultural lots would be large enough to support both residential and agricultural uses. The Applicant is not proposing construction of residences or of any agricultural or equestrian facilities as part of the Proposed Action. Any such future construction on any lot would require site plan approval from the Planning Board, as well as necessary permits from other governmental agencies.

Based on the foregoing, the proposed residential-agricultural lots are of sufficient size to be economically viable for small-scale agriculture consistent with the dominant and growing farm enterprise types in the Town of Amenia and Dutchess County.

As discussed, the majority of PAS and SSI are located within the Agricultural Areas of the proposed residential-agricultural lots where development of structures would be prohibited, preserving opportunities for agricultural use of these soils. The Proposed Action would not result in the excavation or compaction of the soil of active agricultural land. Any potential

future residential development on the residential-agricultural lots may require excavation and compaction of existing agricultural soils, but development activities would be limited to the portion of each lot within an approved RDA. Removal of soil or alteration of underlying soil conditions is not proposed or anticipated as part of potential future residential development. Any future development would manage existing soil resources using standard grading practices.

The Proposed Action would not result in increased development potential or pressure on farmland. Under the current regulations of the Town Zoning Code, the Site could potentially be subdivided into significantly more lots than proposed. The low density residential-agricultural lots being proposed are significantly larger than the minimum under the Town Zoning Code, in order to reduce development pressures on farmland and encourage small farms and agricultural uses on the Site. The Proposed Action would further protect agricultural uses in perpetuity via the Declaration.

The Proposed Action calls for the construction of two new Rural Lanes and certain infrastructure improvements. The Rural Lanes and other improvements have been arranged to follow existing agricultural roadways and preserve continuity of agricultural land, while also providing access to the lots. Of the total Site (605.7 acres), over 90%, or 546.3 acres, would be preserved under the Declaration as agricultural land or open space/forest. The Site would also include the existing equestrian/agricultural facility on proposed Lots K-1 and K-2 that includes several barns, silos, and additional agricultural buildings, which would remain. In addition to the structures there are multiple large paddocks used to raise and train horses. Proposed horse trails between the equestrian facility and the residential-agricultural lots would further enhance access to existing agricultural lands.

The Proposed Action is also consistent with local and regional policies. One goal identified in the Town Comprehensive Plan is “to 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” (Town Comprehensive Plan, page 5). As a result of the Planning Board’s review and acceptance of the Applicant’s previously completed Conservation Analysis for the Site, various restrictions have been incorporated into the layout of the subdivision which ensure the continued preservation of existing agricultural practices and encourage their expansion. This includes preservation of existing agricultural facilities (i.e., the Keane Stud equestrian facilities), and the proposed Declaration restricting the location of homes, materials, colors, requirement of agricultural practices, and construction of additional hedgerows and agricultural roadways, among other things.

The importance of the preservation of the Town’s agricultural economy is referenced throughout the Town Comprehensive Plan, including the acknowledgement that a diversified agricultural industry is emerging in the Town, which is a departure from the more traditional practices of monocropping and dairy farming. The Proposed Action directly supports the Town Comprehensive Plan’s goals to encourage diversified, profitable, small-scale agriculture while also preserving open space historically used for agriculture through restrictions in the Declaration. The agricultural activities envisioned for the Site include a cooperative model of regenerative farming with opportunities for a diverse variety of crops (including orchards), along with continued equestrian operations, hayfields, and open space. By permitting and encouraging smaller-scale farming on the 23 residential-agriculture lots, the Proposed Action would provide opportunities to further diversify the local agricultural market while also fulfilling the Town’s goal to encourage more housing.

A principal issue raised during the DEIS scoping process was the viability of small-parcel farming on the proposed residential-agricultural lots (see Response to Scoping Comments, AKRF, November 5, 2025, addressing comments from the Conservation Advisory Council and Scenic Hudson). The Response to Scoping Comments committed to including a "discussion of market need" in the DEIS. The following analysis addresses that commitment.

LOT SIZE AND AGRICULTURAL POTENTIAL

The 23 proposed residential-agricultural lots range in size from approximately 7 to 41.5 acres, with Agricultural Areas on each lot comprising approximately 90% of the lot area. As documented in the AFPB's 2023 Agricultural District 8-Year Review (**Table 4-7** above), 53% of all farms in Dutchess County are between 1 and 49 acres in size—meaning that a majority of active farms in the County operate on lots of equal size or smaller than the proposed residential-agricultural lots. The proposed residential-agricultural lots are therefore consistent in scale with a significant portion of the County's existing farm economy.

APPLICABLE FARM ENTERPRISE TYPES

Based on the Profile, the farm enterprise types best suited to the proposed residential-agricultural lot sizes include:

- **Specialty Crops** (horticulture specialties, orchards, vegetable farms, vineyards): Specialty crop operations are documented as the fastest-growing agricultural use in the Town by acreage (122% increase from 2014 to 2022) and are economically viable on parcels of 5 to 30 acres. The Declaration expressly permits "specialized agriculture" and "cultivation" on the Agricultural Area of each residential-agricultural lot, which would accommodate this enterprise type.
- **Equestrian Operations** (horse boarding, breeding, and training): Equestrian uses are well-established on the Site through the existing Keane Stud facility and are economically viable on parcels of 5 to 40 acres. The Declaration expressly permits "horse breeding and horse riding" and "commercial or non-commercial animal husbandry" on the Agricultural Area of each residential-agricultural lot.
- **Hay Production**: Production of hay is expressly permitted by the Declaration in the Agricultural Area of each residential-agricultural lot and is economically viable even on smaller lots when combined with other uses.
- **Regenerative and Small-Scale Farming**: The Applicant envisions a cooperative model of regenerative farming across the residential-agricultural lots, consistent with the emerging trend toward diversified, small-scale agriculture documented in the Town Comprehensive Plan and the Profile.

MARKET CONTEXT

The Hudson Valley has experienced significant growth in demand for locally produced specialty agricultural products, driven by proximity to New York City markets and the growth of agri-tourism. Dutchess County's specialty crop acreage grew by 122% between 2014 and 2022, and the number of farms in the County increased over the same period despite a decrease in average farm size. These market dynamics support the economic viability of smaller-scale agricultural operations of the type that would be encouraged on the proposed residential-agricultural lots. Further, a community of 23 smaller-scale farms is considerably more supportive and financially viable than a traditional large field monocrop operation.

"HOBBY FARM" CONCERN

The scoping record reflects public comment expressing concern that the residential-agricultural lots would function as "hobby farms" rather than economically productive agricultural operations. The Declaration's requirement that the Agricultural Area of each residential-agricultural lot be maintained for agricultural or open space use does not itself establish a minimum productivity standard. However, the Declaration's prohibition on residential development outside the RDA—prohibiting residential uses and structures on at least 90% of each lot—ensures that existing agricultural land remains physically available for productive use. The agricultural viability of the Site is further supported by: (a) the continuation of the existing Keane Stud equestrian facility (on Lots K-1 and K-2) as a commercial agricultural operation; (b) the proposed equestrian trail network connecting the equestrian facility to the residential-agricultural lots; and (c) the Declaration's prohibition on uses that would be incompatible with agricultural continuity (commercial kennels, private zoos, exotic animal operations).

AGRICULTURAL FRAGMENTATION

The Proposed Action would not result in fragmentation of a “known and identified critical [mass] of farmland. The following analysis addresses the two distinct dimensions of fragmentation: physical fragmentation—the conversion of contiguous farmland to non-agricultural uses; and ownership fragmentation—the division of unified management across multiple owners.

The NYSDEC FEAF Part 2 Workbook re: Part 2, Question 8, provides the applicable SEQRA standard for evaluating whether a proposed action will fragment agricultural land. Under that standard, fragmentation is assessed based on whether the proposed action will divide agricultural land into parcels too small to support viable agricultural operations consistent with local farm enterprise types, or whether it will impact the ability of farmers within an Agricultural District to keep farming. The Planning Board applied this standard in completing the FEAF Part 2 and Part 3 for the Proposed Action and determined that the potential for significant adverse agricultural fragmentation impacts warranted further analysis in this DEIS.

Defining Fragmentation

Agricultural fragmentation has two distinct dimensions that must be analyzed separately:

Physical fragmentation refers to the conversion of contiguous agricultural land to non-agricultural uses — roads, buildings, pavement — that permanently interrupt the continuity of farmable land and prevent its use for agricultural purposes.

Ownership fragmentation refers to the division of unified management of agricultural land between multiple owners, which may affect operational continuity, farm infrastructure access, and long-term agricultural viability even where the land remains physically intact.

The Proposed Action implicates both dimensions and each is addressed in turn below.

Physical Fragmentation Analysis – Town Level

Before examining site-level physical fragmentation, SEQRA requires that the magnitude of the Proposed Action's agricultural impact must be understood at the municipal level. The Profile documents that the Town contains 27,951 total acres, of which 18,516 acres are in active agricultural use across 285 farm parcels. The maximum area of the Site that could be permanently converted to support residential use as well as agricultural structures (barns,

etc) under the Conceptual Future Buildout Scenario—including all building footprints, driveways, accessory structures, and immediate curtilage across all 23 lots—is approximately 55 acres. This represents approximately one-tenth of 1% of the Town's total land area and approximately 0.16% of the Town's 18,516 acres in active agricultural use. The Proposed Action would result in the conversion of less than two-tenths of 1% (0.2%) of the Town's active agricultural land base to residential use. Under the applicable SEQRA standard, this would not constitute fragmentation at a scale that impacts the ability of farmers within Agricultural District 21 to keep farming.

Physical Fragmentation Analysis – Site Level

The Proposed Action would not result in any material physical fragmentation of the Site's agricultural land. The following facts support this conclusion:

- The total area of SSI on the Site is approximately 218.1 acres. The total area of SSI that would be permanently affected by subdivision infrastructure associated with the Proposed Action (Rural Lanes, trails, stormwater practices) is approximately 7.6 acres—representing approximately 3.4% of the Site's total SSI. The total area of SSI affected by the modeled Conceptual Future Buildout Scenario is conservatively estimated to be approximately 42.2 acres—representing approximately 19.3% of the Site's total SSI (see notes in **Table 4-8**).
- The total area of PAS on the Site is approximately 125.7 acres. The total area of PAS that would be permanently affected by subdivision infrastructure associated with the Proposed Action (Rural Lanes, trails, stormwater practices) is approximately 7.7 acres—representing approximately 6.1% of the Site's total PAS. The total area of PAS affected by the modeled Conceptual Future Buildout Scenario is conservatively estimated to be approximately 12.9 acres—representing approximately 10.2% of the Site's total PAS (see notes in **Table 4-8**).
- The Rural Lanes have been designed to follow existing agricultural roads, hedgerows, and stone walls. As documented in the Conservation Analysis in **Appendix 3**, these alignments were selected specifically to minimize the creation of new barriers across agricultural fields. The Rural Lanes would not bisect or interrupt any active row crop field; they follow existing field edge boundaries.
- The existing 223.6-acre row crop area—the Site's largest contiguous agricultural use—would be substantially preserved within the Agricultural Areas of the proposed residential-agricultural lots and the equestrian lots (Lots K-1 and K-2). No Rural Lane or RDA has been located within the active row crop fields. The physical continuity of this agricultural area would be maintained post-subdivision.

Table 4-8
Agricultural Soils Affected by Proposed Action and Conceptual Future Buildout Scenario

Soil Type	Total on Project Site	Disturbed by Proposed Action[1]	Disturbed by Conceptual Future Buildout Scenario[2]
Soils of Statewide Importance (SSI)	218.1 acres	7.6 acres (3.4% of Site SSI)	42.2 acres (19.3% of Site SSI)
Prime Agricultural Soils (PAS)	125.7 acres	7.7 acres (6.1% of Site PAS)	12.9 ac (10.2% of Site PAS)

Sources: Rennia Engineering Design PLLC, Saratoga Associates
Notes:
[1] Proposed Action disturbance shown is limited to the right-of-way of all proposed Rural Lanes which includes the roadway, landscaped area, equestrian trail, and stormwater swale.
[2] Conceptual Future Buildout Scenario disturbance is based on the lot-by-lot 3D modeling developed by Saratoga Associates in consultation with the Planning Board's consultants, and accounts for residential development within the RDA of each lot as well as agricultural improvements/infrastructure within the Agricultural Area of each lot (See Chapter 2, "Visual Impacts" and **Appendix 4**).

Under the SEQRA standard, physical fragmentation is a small impact where a proposed action does not convert prime farmland soils to permanent non-agricultural use except in limited areas and the remaining agricultural land retains sufficient acreage and physical continuity for viable operations. Based on the above, the Proposed Action would satisfy both of these criteria and therefore result in no significant physical fragmentation impacts.

Ownership Fragmentation Analysis

The Proposed Action will result in 27 separate lots under potentially separate ownership, with each owner having individual decision-making authority over the Agricultural Area of its lot. The Planning Board's FEAF Part 2 identified this as a potential concern warranting analysis. The following addresses the applicable SEQRA standard for assessment of ownership fragmentation, which is whether the Proposed Action would "result in substantial changes in farm management or ownership patterns that will inhibit future agricultural use."

The Proposed Action would not result in those types of changes, for the following reasons:

First, the Declaration's requirement that the Agricultural Area of each residential-agricultural lot be used for agriculture or as open space use ensures that multiple ownership would not translate into agricultural land conversion. Each future lot owner, regardless of their farming intentions, would be legally prohibited from developing the Agricultural Area for residential or commercial purposes. The land in the Agricultural Areas would remain farmable whether or not an individual owner farms it.

Second, the SEQRA guidance specifies that the relevant measure is whether remaining parcels are of sufficient size to support viable agricultural operations consistent with local farm enterprise types. As documented above, the proposed residential-agricultural lots range from approximately 7 to 41.5 acres, with Agricultural Areas comprising approximately 90% of each lot's area. The AFPB's 2023 Agricultural District 8-Year Review documents that 53% of

all farms in Dutchess County operate on parcels of 1 to 49 acres. The proposed residential-agricultural lots would therefore be of sufficient size to support the farm enterprise types that dominate the Town's current and growing agricultural economy—including specialty crops, equestrian operations, hay production, and small-scale diversified farming.

Third, the current row crop operation on the northwestern portion of the Site is conducted under a farm management or lease arrangement that is independent of the ownership structure of the underlying lots. Agricultural leasing—under which a farmer operates on land owned by others—is the dominant model for production agriculture in the Hudson Valley and is expressly contemplated in the Agricultural Areas by the Declaration. The division of ownership would not preclude continuation of a unified farm management arrangement across the Agricultural Areas of multiple lots under a common lease.

Fourth, the Planning Board's Conservation Findings (Resolution #9 of 2023) specifically identified existing agricultural land use areas as among the resources of highest conservation value on the Site. The RDA location on each residential-agricultural lot would directly implement those findings by avoiding agricultural soils to the maximum extent practicable, ensuring that ownership fragmentation would not undermine the physical agricultural resource.

The Declaration's agricultural use requirements, the preservation of over 90% of the Site as agricultural land/open space, the residential-agricultural lot sizes consistent with viable farm enterprises in the local market, and the infrastructure design following existing agricultural boundaries collectively ensures that the Proposed Action would not fragment agricultural land in a manner that will significantly impact the ability of farmers within Agricultural District 21 to keep farming. No significant adverse agricultural fragmentation impact is anticipated.

RIGHT-TO-FARM PROTECTIONS AND INTRA-SUBDIVISION AGRICULTURAL CONFLICTS

The Declaration permits commercial and non-commercial agricultural operations—including animal husbandry, horse breeding, equestrian activities, hay production, and specialty crop cultivation—in the Agricultural Areas of each of the 23 residential-agricultural lots. Future residential owners of one lot may therefore find themselves adjacent to active agricultural operations on a neighboring lot. This section addresses applicable State law and the Declaration's approach to managing such potential intra-lot conflicts.

New York Agriculture & Markets Law §305-a provides that local governments shall not unreasonably restrict or regulate farm operations within Agricultural Districts in contravention of the purposes of New York Agriculture & Markets Law Article 25-AA. This “Right-to-Farm” protection applies to farm operations within Agricultural District 21, in which the entire Site is located. Future owners of the residential-agricultural lots would therefore take title subject to the Right-to-Farm protections of the New York Agriculture & Markets Law. The Declaration will include a Right-to-Farm notice to purchasers, advising all lot buyers that: (a) the Site is located within Dutchess County Agricultural District 21; (b) agricultural operations—including equestrian activities, animal husbandry, hay production, and specialty crop cultivation—are permitted and expected within the Agricultural Areas of all residential-agricultural lots; and (c) residents should expect normal agricultural conditions including noise, dust, odors, and equipment operations associated with farming. This notice is consistent with the model Right-to-Farm law provisions recommended in the Dutchess County Agricultural and Farmland Protection Plan.

The Declaration's express listing of permitted agricultural uses in the Agricultural Areas, and the corresponding list of Prohibited Uses, would provide clarity to all owners regarding what agricultural activities are expected and permitted on the Site, reducing the potential for disputes between residential and agricultural users. No significant adverse impact from intra-lot agricultural land use conflicts is anticipated.

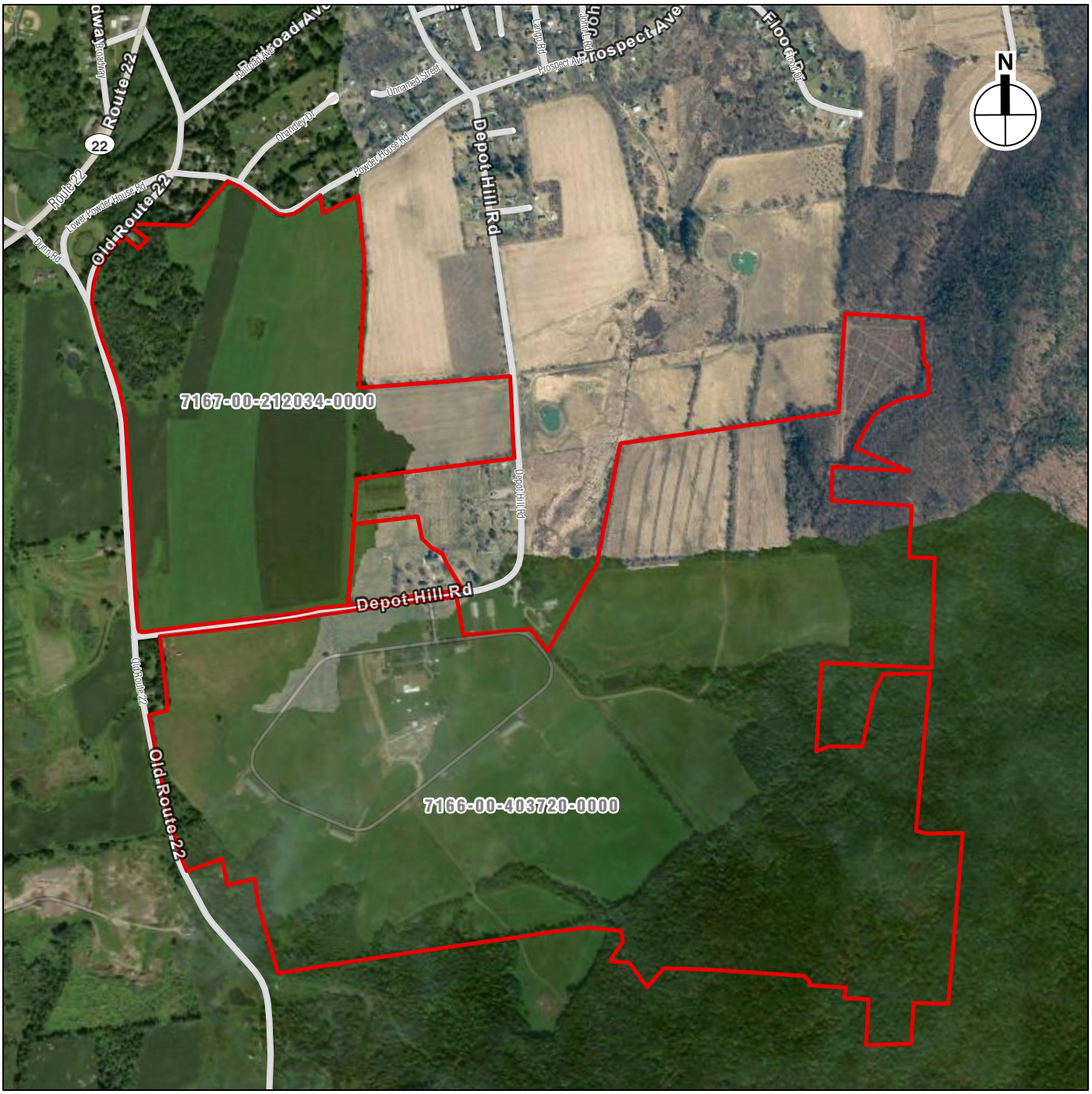
E. MITIGATION

As discussed above, no significant adverse impacts to agricultural resources would result from the Proposed Action. The following measures, incorporated into the Proposed Action through the Declaration and the subdivision design, constitute the primary mitigation for potential agricultural resource impacts:

1. Preservation of Agricultural Land: Over 90% of the Site (approximately 546.3 acres) would be preserved as agricultural land or as forest/open space through the Declaration's Agricultural Area restrictions, which prohibit residential and commercial development outside the established RDAs.
2. Protection of PAS and SSI: RDAs have been sited to avoid the highest-quality agricultural soils, consistent with the Planning Board's Conservation Findings for the Proposed Action. The majority of PAS and SSI are within the Agricultural Areas.
3. Continuation of Equestrian Agricultural Operations: The existing Keane Stud equestrian facility (Lots K-1 and K-2) would remain in operation as a continuing commercial agricultural use, providing an anchor for agricultural activity on the Site.
4. Agricultural Use Requirement: The Declaration requires that the Agricultural Area of each residential-agricultural lot be maintained in active agricultural or open space use, with a broad range of permitted farm enterprise types consistent with the Town's evolving agricultural economy.
5. Right-to-Farm Notice: The Declaration will include a Right-to-Farm notice to all purchasers, ensuring that future residential owners are informed of the Right-to-Farm protections of the New York Agriculture & Markets Law and accept the agricultural character of the Site and the Agricultural District protections applicable to it.
6. Infrastructure Design: The Rural Lanes have been designed to follow existing agricultural roads and hedgerows, minimizing disruption to agricultural operations and maintaining the physical continuity of agricultural fields.

No additional mitigation measures beyond those incorporated into the Proposed Action are required. The Proposed Action, as designed and subject to the restrictions of the Declaration, is consistent with the agricultural preservation goals of the Town Comprehensive Plan, the Dutchess County Agricultural and Farmland Protection Plan, and the Cornell Cooperative Extension's 2022 Agricultural Profile for Amenia.

5.20.26

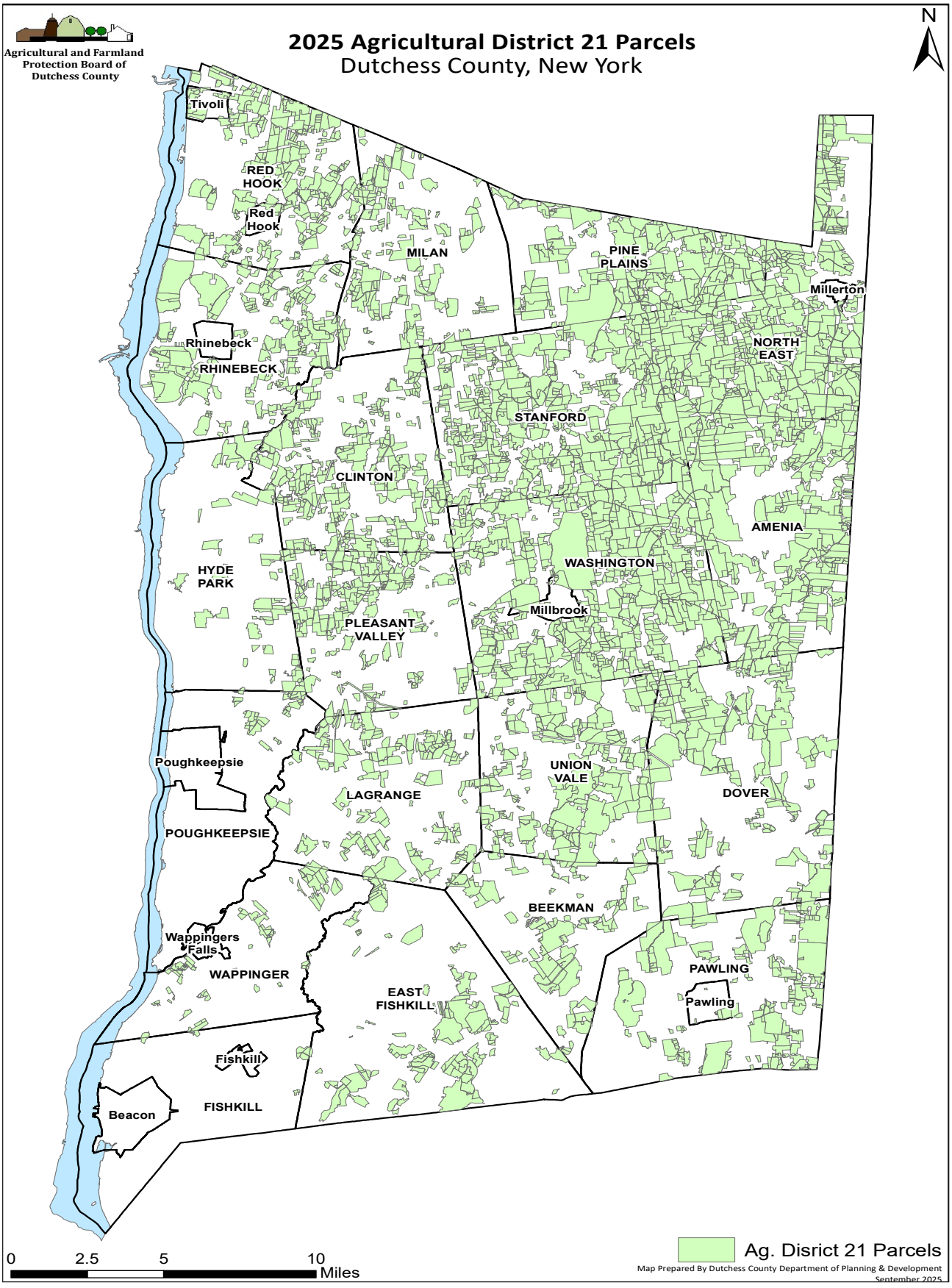


Site Aerial

KEANE STUD SUBDIVISION

Figure 4-1

1.14.26



Dutchess County Agricultural District 21

KEANE STUD SUBDIVISION

Figure 4-2

Source: Rennia Engineering Design, PLLC

Site Soils

KEANE STUD SUBDIVISION

Figure 4-3