

June 14, 2021

Ms. Ivy Pool, Supervisor  
Town of New Castle Town Board  
200 South Greeley Avenue  
Chappaqua, NY 10514

**Re: Rockledge Farm / Special Use Permit Request  
348 Whippoorwill Road**

Dear Supervisor Pool & Members of the Town Board (TB):

On behalf of our client, Rockledge Farm and at the request of the Town's Director of Planning, we provide new and updated information in connection with the applicant's request to the Town Board to grant a Special Use Permit to allow the former Twin Oaks Swim & Tennis Club to function as a regenerative farm. We attach the following information for your and the Town Board's further consideration.

- This explanatory **Cover Letter/Narrative Report**, prepared by J.D. Barrett & Associates, LLC, dated June 14, 2021.
- A **Memorandum**, entitled "Regenerative Farm Practices, prepared by Madeline Wachtel/Rockledge Farm, dated June 14, 2021.
- A completed long form **NYS Environmental Assessment Form (EAF)**, prepared by J.D. Barrett & Associates, dated June 14, 2021.
- A revised **Site Plan**, entitled "Rockledge Farm Master Plan", prepared by J.D. Barrett & Associates, LLC, dated June 14, 2021.

**Overview**

Rockledge Farm is seeking a Special Use Permit to operate the former Twin Oaks Swim & Tennis Club as a Regenerative Farm. Additional information was requested to be provided to assist the Town Board with their deliberations, including a brief description of regenerative farming practices proposed and responses to concerns, as noted by the Town's Planning Board (PB) following their review of the project.

**Regenerative Farm Practices**

We attach to this letter a Memorandum prepared by Madeline Wachtel/Rockledge Farm that describes regenerative farming practices proposed, including permaculture, organic farming practices, minimal tillage, cover cropping, crop rotation and rotational animal grazing. The memo attached to this letter will provide further details on the practices proposed.

## Planning Board Comments

Responses to concerns noted by the PB in a Memorandum prepared by Robert Kirkwood, Chairman, New Castle Planning Board, dated June 1, 2021, are as follows.

- Animal Grazing and Understory Maintenance. Please see the Memorandum prepared by Rockledge Farm that discusses the regenerative farming practices proposed.
- Stormwater Runoff in Watershed Property. The PB had noted concerns of animal waste from the Rockledge Farm herd posing a pollution source leaving the property in stormwater runoff. We note that the Rockledge Farm “herd” consists of 8 pygmy goats, 2 llamas, 8 sheep and 126 chickens. The 8 goats, 2 llamas and 8 sheep are intermingled daily in one of the four proposed fenced pastures. The pastures average approximately 52,675 SF each, or 1.2 acres each to accommodate 18 animals, which is generous. The herd spends approximately three days consecutively in each of the four pastures before being rotated to another pasture. The pasture rotation helps to allow the pastures to recover after three days of grazing and nine days of non-grazing

The manure produced by the herd is considered “cold pelleted manure”, which is cleaned up twice a week. Farm staff gathers up the manure with rakes and shovels and collects it in buckets. The manure then is reused as fertilizer on the vegetable crops and flower gardens. During a rain event, at any given time, therefore only a small amount of cold pelleted manure may be present on the ground. It is noted here that any residual manure not cleaned up by farm staff will likely be absorbed by the pasture vegetation and/or ground leaf litter, etc. In order to ensure, as best possible, that pollution laden stormwater runoff does not leave the property, it is proposed that a continuous line of staked/double coir logs be installed at the down slope sides of the pasture fences. One coir log will be staked in place on both the uphill and downhill sides of the fence. The coir logs will function as filter strips that help to slow stormwater runoff and allow any suspended solids to settle at the base of the coir logs. Any cold pelleted manure will be cleaned from the coir log area following rain events. In addition to the above, it is also proposed that a single staked coir log be installed at the top of the pasture areas. This coir log shall serve as a stormwater diversion/baffle to slow and reduce stormwater velocity and quantity from above the pastures to thereby decrease the amount of stormwater runoff leaving each pasture, which will correspondingly reduce the potential for manure laden stormwater running off of the pastures.

The coir logs will be specified at 12” diameter and consist of a high density weave. This will ensure long-term protection. The high density coir logs will eventually decompose in place (+/- 5 years), creating a small mound at the soil surface. Native vegetation can then be allowed to grow through the coir log “mounds” to further anchor them with roots and thereby increase the filtration properties of the vegetated coir log filter strips.

- Pasture Positioning. The pastures are positioned in the area of the former swimming pool for the former Twin Oaks Swim & Tennis Club and also on the north facing sloping hillside to the south of the former pool area. There are four pastures proposed and average approximately 1.2 acres each. The pastures are mostly wooded with a light understory. The former pool area pasture is grassed. We note here that the closest point of any pasture to the point on the property where stormwater runoff exits the property is +/- 560 LF, the majority of which is wooded with a light understory and natural leaf litter ground plane. We, therefore, believe any runoff leaving the pasture area will be additionally filtered by the existing trees, understory, leaf litter and existing soils prior to discharging from the property, thereby further enhancing stormwater runoff quality.
  
- Chicken Manure. The chicken manure is collected with the hay from within the chicken coops. The hay and manure combination is removed three times a week from the coop and stored in a dumpster with a lid. Once a week the 200 lbs. of manure will be removed by a carting company. This will ensure that no stormwater pollution will be created by the collecting and disposing of the chicken manure.
  
- Water Quality Testing. It was suggested by the PB that the applicant consider implementing a stormwater quality runoff testing schedule to monitor runoff from the property that might be impacted due to the grazing of the farm animals. It is respectfully requested that this requirement be waived, given the circumstances described above and considering the following.
  - The farm herd consists of only 18 animals which shall be pastured together in one of four – 1.2 acres fully vegetated pastures. The herd shall be rotated to a different pasture every three days to allow the pasture vegetation to regenerate itself following grazing. This will keep the pastures fully vegetated and stabilized, thereby minimizing the risk of erosion and sedimentation and maximizing the pasture's ability to absorb nutrients.
  - The herd manure is characterized as “cold pelleted manure”. It is cleaned up twice a week by farm staff into buckets and reused as fertilizer for the crops. Any residual manure left on the pasture will likely be absorbed by the pasture vegetation or ground litter in the pasture. Any pelleted manure that is suspended in stormwater runoff will be trapped at the coir log filter strips where it can be collected for reuse on the crops. These measures will ensure that minimal pollutant laden stormwater runoff will exit from the pasture area.
  - Chicken manure will not pose a stormwater pollutant risk because it is collected from the chicken coops by farm staff and immediately placed in an enclosed dumpster for removal from the property weekly.
  - A coir log diversion/baffle will be installed upslope of the pasture area to reduce stormwater runoff flowing over the pasture area from upslope areas. This will ensure that the runoff from the pasture areas is minimized, thereby minimizing erosion and maximizing water quality.

- The closest point of any pasture to the low point on the property where stormwater runoff exits the site is +/- 560 LF of dense vegetation and light understory and heavy leaf litter, thereby further enhancing water quality through filtration and absorption.

### **Summary**

We trust that the attached and above information will be helpful to the Town Board's consideration for the project. The applicant looks forward to discussing the project with the Town Board at the June 22, 2021 Public Hearing for the project.

Rockledge Farm is grateful to the Town Board and Town Staff for their assistance with this project.

Respectfully submitted,

*Jeri Barrett*

Jeri D. Barrett, R.L.A.

JDB:lj

Enc.

cc: Sabrina Charney Hull, Director of Planning  
Annie Zabar & Bill Wachtel – Rockledge Farm Owners/Applicants  
Madeline Wachtel – Rockledge Farm  
Leo Lenis – Rockledge Farm Manager