

MEMORANDUM

TO: Honeoye Falls Village Trustees

FROM: Mendon Town Board

DATE: September 2, 2026

SUBJECT: Proposed Copperfield Community Development Preliminary Intermunicipal Comments and SEQRA Comments

CC: Mendon Planning Board, Mendon Environmental Conservation Board, Michelle Booth - Town Clerk, Pete Doyle – Highway Superintendent, Corey Gates - Code Enforcement Officer, Megan Dorritie - Mendon Town Attorney

Thank you for sharing the Village of Honeoye Falls' notice regarding the proposed Residential Community Subdivision and the Village's intention to serve as Lead Agency. We appreciate receiving the materials and the opportunity to review the scope of the project, including the proposed mix of 242 single-family homes and 170 multifamily apartments, totaling 412 units across all phases.

Please confirm the specific Village body that will serve as Lead Agency and whether the Town is being treated as an involved or interested agency.

As the Town Board continues its review, we want to highlight several areas where this development may have significant environmental, operational, or fiscal impacts on the Town and its residents and taxpayers. Please note that the Town recognizes that land-use jurisdiction over the proposed Copperfield development rests with the Village. Accordingly, the comments provided herein are directed principally toward potential off-site impacts on Town property, infrastructure, services, environmental resources, residents, and taxpayers. Additionally, to the extent the project may require use of or modifications to Town-owned infrastructure, Town rights-of-way, easements, permits, funding decisions, or other discretionary Town actions, the Town expressly reserves all applicable authority with respect to those actions. The areas we wish to highlight are as follows:

- **Emergency Services:** Increased demand for fire protection and ambulance services may affect the agencies providing fire, EMS, and mutual-aid coverage within the Village and Town. The review should project changes in call volume and response times, assess staffing, apparatus, and facility capacity, and identify any resulting capital or operating costs that would fall on the Town, its Districts, or Town taxpayers. The review should also identify primary and secondary emergency access routes and evaluate whether project traffic, roadway configuration, or phased construction could affect emergency response routes serving residents in the Town.

- **Transportation and Roadway Impacts:** The Town is responsible for the maintenance of Quaker Meeting House Rd. We request information regarding anticipated traffic increases, potential effects on roadway conditions and safety, and whether roadway improvements or expansions may be necessary as a result of the development. The traffic study should address construction routes, intersection operations, pedestrian and bicycle safety, pavement impacts, recommended improvements, and responsibility for each project-related cost. The review should specifically identify anticipated construction access routes, the extent to which heavy construction traffic will use Town-maintained roads, expected duration and intensity of such use, potential pavement or drainage damage, and responsibility for inspection, repair, and restoration of Town infrastructure. The traffic study should include updated traffic count data, calculated AM & PM peak hour vehicle trips, review of sight distance from intersection, background growth data assumptions, a review of minor and major intersection impact within a 5 mile radius, a review of capacity and levels of service, comparison of predeveloped conditions (prior to Chase Meadow Trail) and future buildout, and identify if road improvements are needed in the study area.
- **Potable Water Supply and Capacity:** Given the scale of the proposed development and the regional nature of the public water system serving both the Village and portions of the Town, the review should document projected average and peak potable-water demands and evaluate whether existing supply, distribution, storage, pressure, and fire-flow capacity are sufficient to accommodate the development. The review should identify any necessary system improvements and evaluate whether the project, together with other reasonably foreseeable growth, could affect water-system capacity or service to existing users with the Town, and identify measures necessary to avoid or mitigate such impacts.
- **Wastewater and Water-Resource Impacts:** The Town understands that the proposed development would be served by the Village's municipal wastewater system, as residents outside the Village generally rely on onsite septic systems. Accordingly, the Town's interest is focused on potential off-site environmental or infrastructure effects that could extend beyond the Village boundary. The review should document potable-water supply and distribution capacity; sanitary-sewer conveyance and treatment capacity; projected average and peak demands; required upgrades; applicable discharge and permit limits; emergency or backup systems; and responsibility for capital, operating, and maintenance costs. It should also evaluate whether increased flows, discharges, system failures, or related infrastructure improvements could adversely affect the Town or require use of Town property, rights-of-way, or other infrastructure and identify measures necessary to avoid or mitigate those impacts. The review should further evaluate how wastewater demands associated with full buildout, together with other reasonably foreseeable growth, relates to capacity and planned expansion of the Village's wastewater system.

- **Stormwater Management and Drainage:** Storm water management should be carefully evaluated due to existing flooding issues already experienced in the surrounding area. Portions of Quaker Meeting House Road are currently impacted during significant rain events when runoff increases water levels in the creek located just south of Cheese Factory Road. In addition, residents in the 100-200 block of Cheese Factory Road experience flooding and elevated water levels behind their homes during heavy rainfall. Because this same creek system serves the affected area, any additional runoff generated by a development of this size could exacerbate existing drainage and flooding problems unless comprehensive mitigation measures are implemented and verified. The review should provide existing and proposed drainage-area mapping, discharge locations, predevelopment and post-development runoff volumes and peak flows, downstream capacity analysis, and the ownership and maintenance plan for every permanent stormwater facility.
- **Floodplain and Flood Risk Considerations:** Given ongoing concerns regarding flooding along Irondequoit Creek and Honeoye Creek, the review should evaluate current floodplain mapping and cumulative downstream impacts across all phases using current hydrologic and hydraulic analysis. The Town would like to understand whether the proposed development could increase peak flows, runoff volumes, flood elevations, or flood risks along Cheese Factory Road, Quaker Meeting House Road, within the Hamlet area, Sibley Road, Plains Road, or other downstream areas.
- **Surface Water Quality:** In addition to evaluating runoff dynamics and flood risk, the review should evaluate potential effects on downstream water quality resulting from construction and long-term operation of the development. This should include identification of receiving waters and drainage pathways extending beyond the Village boundary and consideration of sediment, nutrients, road salt, petroleum-related contaminants, lawn and landscape chemicals, and other pollutants ultimately enters watercourses or other resources within the Town, the review should identify measures necessary to avoid or minimize downstream impacts.
- **Groundwater and subsurface Hydrology:** The review should evaluate whether grading, stormwater infiltration practices, utility construction, groundwater dewatering, or other project activities could materially alter groundwater flow or groundwater quality beyond the project site. Particular attention should be given to any potential effects extending into areas of the Town dependent upon onsite wastewater treatment systems (e.g., septic systems) or, where applicable, private groundwater supplies.

- **Long-Term Infrastructure Responsibilities:** We would appreciate clarification regarding the Village's plans and commitments for long-term maintenance of public infrastructure, allocation of ongoing responsibilities, and coordination with the Town as the project moves forward. Please identify whether roads, sidewalks, stormwater facilities, utilities, pump stations, open spaces, or other infrastructure will be owned and maintained by the Village, a utility, a homeowners' association, or another entity. No ownership, maintenance duty, or financial responsibility should be transferred to the Town without a separate written agreement and Town approval.
- **Cumulative Growth Impacts:** Because Copperfield represents substantial residential growth and is proposed during a period of other infrastructure investment and potential development within the Village, the environmental review should consider the cumulative effects of Copperfield together with other reasonably foreseeable growth and whether those combined effects could extend into the Town. Particular consideration should be given to cumulative traffic on Town roads, demand for shared or mutually supporting emergency services, potable water demand and system capacity, downstream stormwater and flood condition, water quality and groundwater resources, school district capacity, and use of Town-funded facilities and recreational resources.

In addition, the Town has identified several technical and long-range planning considerations for further evaluation:

- **Development Phasing:** The proposed construction schedule appears ambitious. Based on our understanding of the materials provided, Phase 1 includes approximately 128 dwelling units by 2033, Phase 2 approximately 198 units by 2037, and the final phase approximately 241 units by 2041. The pace of development contemplated for a project of this magnitude warrants careful consideration to ensure that infrastructure, services, and community resources can adequately accommodate growth over time.
- **Town Facilities and Recreational Resources:** The review should identify whether projected population growth is reasonably expected to materially increase demand for or impacts to Mendon's parks, open spaces, recreational assets, and other Town facilities. Where such impacts are identified, the review should evaluate associated capacity, maintenance, or capital needs and any resulting fiscal effects on the Town and its taxpayers, taking into account applicable Town-wide and part-Town funding responsibilities.
- **Site Topography:** Existing topographic information was not clearly depicted in the materials reviewed. Existing and proposed topographic mapping, including sufficiently

detailed contours, is essential for evaluating drainage patterns, grading impacts, and stormwater management throughout the site.

- **Soil Conditions and Sedimentation:** The site contains clay soils that, while generally stable in place, may become vulnerable to erosion once disturbed during construction. Given the project's proximity to the watercourse protection overlay district, careful attention should be paid to erosion and sediment control measures to prevent impacts to nearby waterways during all phases of development. The review should specify construction sequencing, stabilization deadlines, inspection frequency, corrective-action triggers, and responsibility for monitoring throughout all phases.
- **Municipal Cost Impacts:** For each off-site improvement or additional service identified through the review, the Village should identify the responsible entity, estimated capital and operating cost, funding source, and proposed allocation. To the extent authorized by law, project-related studies and mitigation should be funded by the project sponsor. No cost or long-term obligation should be assigned to the Town or town-maintained infrastructure without the Town's express written approval.

In summary, given the scale and duration of the proposed project, the Town believes the coordinated review should include a thorough, evaluation of environmental and operational impacts through full buildout, including impacts that may extend beyond the Village boundary and affect Town residents, property, infrastructure, services, environmental resources, or taxpayers. The evaluation should also consider cumulative effect with other potential development within the Village, and where those cumulative impacts may affect the Town's interests. This information will be important as we develop any formal comments on the proposal. Please include this memorandum in the coordinated SEQR record and provide the Town with revised plans, technical studies, agency comments, and proposed mitigation measures as they become available.

Thank you again for keeping us informed throughout this process. We look forward to continued coordination and communication as the review progresses.

Sincerely,

Town Board of the Town of Mendon

Joe Alati, Town Supervisor
Tanner Cheek
Rebecca Kreuzer
Kim Roberts
Tom Voorhees