



To: Town of Amenia Planning Board

Date: January 21, 2015

Memorandum

Project #: 29011

From: Amanda DeCesare, P.E.

Re: Amended MDP and Site Plan Phase 1 Comments
Silo Ridge Resort Community

Silo Ridge Ventures, LLC (the "Applicant") and its professional consultants respond to Mary Ann Johnson's October 13, 2014 comments as follows (responses are presented in the same order as the comments)¹:

Master Development Plan

1. Section 1.2 on Existing Conditions describes the site as including the 682 acres owned by the Harlem Valley Landfill Corporation. Previously, the site was only described as the 670+ acres referred to as the Silo Ridge site. Please explain why this change was made.

Response MAJ-1: The description has been revised to read as follows:

The Silo Ridge site (the "Site") is a total of approximately 684.9 ± acres, comprised of: (i) the 669.9± acre site of the former Silo Ridge Golf Course; (ii) 6.4 ± acres from the adjoining property owned of record owned by Harlem Valley Landfill Corp., to be made part of the Site by lot line adjustment; and (iii) an approximately 8.6 ± acre easement area on the Harlem Valley Landfill Corp. property, within which an access road, the Golf Maintenance Facility, and the wastewater treatment plant for the Project will be located.

2. In Section 2.5 on lighting, the following bullet, "No street or area lighting fixtures will be tilted upward to project light farther, since this can turn a good quality fixture into one that produces glare or skyglow", has been deleted. Review of the lighting plan (sheet SL1.01-SL1.06 in the Site Plans reference a "Square Gold Star Uplight" and a Micro Nite Star with manufactures information about the lights provided on sheet SL1.06. Both of these lights will be providing "uplight" to the pool areas and for uplighting trees. The Zoning Code (§121-40.L.) states "All exterior lighting, including security lighting, in connection with all buildings, signs, or other uses shall be shielded and directed downward and away from adjoining streets and properties." I have also referred this

¹ Unless otherwise indicated, all references to: (i) the "Amended MDP" are to the Amended Master Development Plan dated January 2015; (ii) the "Addendum to EAF" are to the Addendum to Environmental Assessment Form dated January 2015; (iii) the Site Plan Drawings are to the plans and drawings last dated January 8, 2015; (iv) the Preliminary Subdivision Plat and to the Subdivision Drawings are to the drawings last dated January 8, 2015; and (v) to the "Amended MDP Drawings" is to the drawings accompanying the Amended MDP narrative, all last dated January 8, 2015.



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information to Dr. Klemens and George Janes for their input on any wildlife and visual concerns but my recommendation is that all uplights be removed from the lighting plan to be in compliance with Zoning or in the alternative, the Applicant may seek a variance from the ZBA.

I also refer the Planning Board to page 57 of the MDP– Appendix E: Lighting. In the paragraph on landscape lighting, there is a reference to “small amounts of uplight”.

MDP - Page 59 – The following sentence has been deleted: “Light emitted horizontally from light fixtures (from 90⁰ to 100⁰ as measured from straight downward) contributes strongly to light pollution, so it is important to use fixtures that direct less light at angles”. Again, this appears to be a diminishment of the previous commitment to preserve “dark skies”.

Response MAJ-2: All uplighting (previously only located at trees as part of landscape lighting) has been eliminated. All new fixtures comply with current requirements. Please refer to Site Plan Drawings SL-1.00 to SL1.09 for lighting design. The text in the Amended MDP has been revised accordingly.

3. The Artisan Park is shown as open space on page 53 of the MDP. There have been discussions about the Applicant offering this land to the town. I defer this issue to Dave Everett to ensure the park can count as open space.

Response MAJ-3: Comment noted. The Artisan’s Park Overlook is open space under RDO District regulations, as confirmed by the Planning Board and its counsel.

4. The Golf Academy is shown as being included in the open space calculation as well. According to §121-18.C.4, non-agricultural buildings larger than 200 square feet in foot print cannot be included.

Response MAJ-4: The Golf Academy parcel has been removed from the open space calculation. All other buildings having a footprint greater than 200 square feet have been removed from the open space calculation. Please refer to MDP Drawing SP-4.

5. I recommend the Planning Board also confer with Dutchess Land Conservancy (DLC) for any input they may have and to discuss areas where this overlap with the site plan review and the conservation easement (e.g. demarcation of the easement area, conservation value of the land offered for easement, etc). DLC’s input at this stage is critical to ensure that open space requirement can be achieved. I have spoken with Chairperson Fontaine and we have agreed that I will coordinate scheduling a meeting with DLC and the appropriate town’s consultants.

Response MAJ-5: Comment noted. The Applicant and the Planning Board have met with DLC on numerous occasions. Please refer to Appendix B Response to Dutchess Land Conservancy Memorandum dated December 4, 2014 in Volume V: Response to Comments.



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It should be noted that determinations regarding what constitutes open space within the meaning of RDO District regulations and the conservation values and configuration of the land to be conserved, are solely within the jurisdiction of the Planning Board.

- 6. The Water Supply Conceptual Plan shows the water storage tank has been relocated to the north side of Route 44. I understand this has raised concerns regarding visual impact and whether or not the land can be counted as open space (this area is shown in the open space calculation).

Response MAJ-6: The water tank and all related infrastructure have been relocated south of Route 44 and west of the driving range. The water tank will be partially buried with the exposed side facing the woods towards the west, which will therefore not be visible from any vantage point or public roads. Additionally, the water storage tank parcel has been removed from the open space calculation.

Please refer to the following:

- Response GMJ-1;
- Letter regarding Silo Ridge Response to Visual Analysis Comments, dated December 8, 2014;
- MDP Drawings SP-4 and U-2; and
- Site Plan Drawings C4.02 and C6.02.

- 7. The following is an analysis of the proposed parking against the §121-38 of the Town’s Zoning Law:

Standard in §121-38	Required	Proposed	Difference
Single or Two Family - Two spaces per dwelling unit	159 dwelling units = 318 spaces	318 spaces in two car garage/unit + 318 spaces in driveways but not counted in total	0
Multi-Family dwelling – 1.5 spaces per unit	52 condominium units = 78 spaces. 13 townhomes = 20 spaces	Condos: 78 spaces in underground parking + 14 surface parking spaces and 5 spaces in the covered parking barn = 97 spaces. Townhomes: 10 surface spaces + 15 spaces in the	+ 19 spaces for condos +10 spaces for townhomes



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Standard in §121-38	Required	Proposed	Difference
		covered barn for a total of 25 spaces.	
Lodging Units – one space for each bedroom plus one space for each non-resident employee and one space for every 200 sq ft of floor space for meetings and functions	This calculation has not been described in the MDP.	1.5 spaces per lodging unit ¹ for 16 units (in the two separate buildings) for a total of 24 spaces in underground spaces.	N/A
Restaurant – one space for every 3 seats	80 seat winery restaurant = 27 spaces	34 spaces being provided	+ 7 spaces
Retail or service business – four spaces per 1,000 sq ft of enclosed space ²	Sales center/general store = 4,062 sq ft = 17 spaces. (Note there is no description of the sq footage of the sales center ³ in the MDP but the general store is described as ~1,000 sq ft).	23 spaces provided	+ 6 spaces
Other places of public assembly – one space for every 3 seats	Family activity barn: 32 seat theatre = 11 spaces	1 space for every 3 seats = 10 spaces + 1 space for every 200 sq ft of general assembly ⁴ for 3,850 sq ft = 20 spaces or 30 in total	See note # 4
Retail or service business – four spaces per 1,000 sq ft of enclosed space	Fitness center: 3,750 sq ft = 15 spaces	1 space for every 200 sq ft of lodging ⁵ for 3,750 sq ft = 19 spaces.	+ 4 spaces



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Standard in §121-38	Required	Proposed	Difference
Retail or service business – four spaces per 1,000 sq ft of enclosed space	Golf Academy: 1,000 sq ft = 4 spaces	4 spaces provided.	0
Use not listed ⁷	Gatehouse:	Proposed 1 space per employee and provided 1 space	
Use not listed ⁷	Golf Maintenance Facility	Proposed 1 space per employee and provided 30 spaces	
	Clubhouse ⁸	There is no information provided on the number of spaces required.	
	Water and Wastewater facilities ⁸	There is no information provided on the number of spaces required.	
	Artisan Park ⁸	There is no information provided on the number of spaces required.	
Totals		605 spaces described in the MDP text	46 spaces over the required per Zoning

Notes on the table:

- 1 – It is unclear why the Applicant offered a different standard from that noted in the Zoning. Additionally, it is unclear how parking for the 5 lodging units in the Clubhouse is being treated.
- 2 – The Applicant describes the parking standard as 1 space for every 250 sq ft in the MDP which is the equivalent



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of the parking standard in the Zoning however I recommend the text be edited to reflect the Zoning for consistency.

3 – Please provide the square footage of the Sales Center.

4 – This standard for general assembly is not described in the Zoning. The Applicant should offer an explanation for why it has been used for the Family Activity Barn.

5 – It is unclear why the Applicant has chosen a different standard. Please explain.

6 – Note #2 above also applies to the Golf Academy.

7 – These uses do not fit easily into the categories provided in the Zoning. The Applicant should offer a rationale for the parking standard they have proposed for the Planning Board's consideration.

8 – There is no discussion in the MDP on parking for these uses.

Response MAJ-7: As per the Town consultants' recommendation, the term "shared parking" is no longer used to describe the parking management plan for the Modified Project. Additionally, please refer to section 4.4 of the Amended MDP, which has been revised accordingly.

Under Section 121-18C(5) of the Town Zoning Code, the off-street parking requirements set forth in Section 121-38 of the Zoning Code do not apply in the RDO District. The parking requirements shown in the table therefore serve only as a guideline for the parking requirements of the Modified Project.

8. §121-38 does allow for uses not described in the Zoning and does allow the Planning Board some flexibility in determining the appropriate amount of parking. It would be appropriate for the Applicant to offer some rationale for those uses where the Zoning does not provide clear guidance, e.g. the Clubhouse, etc. and for those uses where the Applicant has offered a standard that is different from the Zoning.

Response MAJ-8: Please refer to Response MAJ-7.

9. There should be a count of the number of spaces being provided for golf cart parking as seen on MDP sheet P1.

Response MAJ-9: The number of spaces provided for golf cart parking has been added to the Amended MDP, MDP Plan Drawing P-2 and Site Plan Drawing P1.02.

10. The discussion on shared parking in section 4.4 remains confusing. This section states that the amount of parking provided is equal to or greater than the standards provided in the Town Zoning Law and describes "a balance of parking that can be made available as and when required for shared parking and parking management strategies". The concept of "shared parking" is utilized to reduce parking but that does not seem to be the case. Clearly, there is a plan for parking management (such as the shuttle for employees and the valet parking), but how this reduces the overall count for spaces remains unclear. If shared parking is not being proposed to reduce the number of spaces, then the references to shared parking should be removed.

Response MAJ-10: Please refer to Response MAJ-7.



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11. The parking for the Golf Maintenance building is described twice in the text. See page 34.

Response MAJ-11: Please refer to Response MAJ-7.

12. The text describing the number of spaces is not consistent with the parking calculation on MDP sheet P1 and P2. For example, the text describes 50 spaces for the Family Activity Barn but sheet P2 shows 67 (maybe 77 in total- not clear how the 10 convenience spaces are accounted for). Sheet P2 states 62 for the Golf Maintenance Facility (35 in the overflow area) but the text states 30 for employees and that would leave 32 for overflow not 35. In addition, I count 78 spaces in the plan for the Golf Maintenance area. Spaces shown on the plans should reconcile with the text in the MDP.

Response MAJ-12: Please refer to Response MAJ-7.

13. In the table above, the total parking spaces are 605 but I can locate 725 combined on sheets P1 and P2. This needs to be reconciled.

Response MAJ-13: Please refer to Response MAJ-7.

14. The Non-Residential Shared Parking section describes a total of 84 spaces – not 166 as indicated in the text.

Response MAJ-14: Please refer to Response MAJ-7.

MDP Plan Set

15. On SP-1, can you please add a note that states "Existing Conditions as of ____ and some language about the Applicant seeking approval to do golf course work on holes x,y, z, etc on ____". I think this will help to connect the dots on the changing existing conditions between the MDP and the site plan. On the Site Plan Existing Conditions, a similar note would indicate the when the approval was received and perhaps the area impacted can be shaded to assist in understanding the difference between the plan sets.

Response MAJ-15: A note has been added to Site Plan Drawing SP-1, stating that existing conditions reflect conditions prior to the commencement of any work, including the work on the course for which site plan approval has been waived by the Planning Board.

Additionally, Note 1 on the Existing Conditions Plan, Site Plan Drawing C2.00, has been revised for clarity. Hatching has been added to C2.00 to show the golf work performed to date.

16. SP-11 does not show the relocated water tank.



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Response MAJ-16: Amended MDP Drawings SP-10, SP-11, SP-17, SP-18, A-5 and A-6 are the current approved October 2009 master development plan; no changes have been made. A note was included to show that the drawings are the "2009 Approved MDP drawings."

Furthermore, the relocated water tank is shown on Amended MDP Drawing U-1.

17. GP-1. The Planning Board should consider asking the Applicant to relocate the WWTP. The current location is problematic because of the SPO protections for the roadway, the extensive grading and steep slopes. In the original approval, the WWTP was intended to serve the hamlet and this location made sense. Since that option is off the table, this location does not seem as necessary and as the Applicant has control over an additional 682 acres, an alternative should be evaluated.

Response MAJ-17: The wastewater treatment plant ("WWTP") has been relocated to the south to the Golf Maintenance Facility area on the Harlem Valley Landfill Corp. property. All engineering and architectural plans have been revised accordingly.

18. LA-2. This sheet offers examples of lighting fixtures and includes pole lighting. The Applicant has indicated they will not be using pole lighting and these pictures should be removed.

Response MAJ-18: All references to pole lighting, including pole lighting images, have been removed from MDP Drawing LA-2 and the Amended MDP text.

Addendum to EAF

19. Table 4 – Transportation section. There was a reference to the Applicant that stated "Shuttle will be provided as needed by the resort operator" has been removed in the August 20, 2014 revision of the Addendum. Is this correct? If yes, please explain why this mitigation measure has been removed.

Response MAJ-19: Table 4 has been revised to include that mitigation measure.

20. As noted in my memorandum of August 20, 2014, the list of waivers in the Table 4 should reflect the final list of waivers requested by the Applicant.

Response MAJ-20: Table 4 has been revised to include all waivers being requested. Please refer to memorandum regarding Supplementary Planning Board Approvals, Waivers, and Determination pursuant to §121-18.C(7) of the Town Zoning Code, dated February 5 2015, in Appendix O of the Addendum to the EAF.



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21. Table 4 – Local and Regional Plan Consistency section. This section indicates the Applicant will be seeking a waiver from RDO requirement to incorporate major design elements of TND, especially the clustering of homes in walkable distances. This statement is inconsistent with the information provided in the TND memo provided by the Applicant. This should be clarified.

Response MAJ-21: The Applicant acknowledges that, like the current approved project, the Modified Project does not fully comply with TND principles with respect to the single-family homes, Vineyard Cottages, private streets and gated entrances. The single-family homes located along the western boundary of the golf course and the bottom of the wooded hillside are within comfortable walking distance of the Village Green core area, but do not fully comply with TND principles. The Vineyard Cottages are physically separate and distinct from the Village Green area, and have a recreational area separate and distinct from the recreational facilities located in the Village Green area. Streets are not generally interconnected, although this directly results from preservation of existing environmental features in furtherance of other Town goals and objectives (and in compliance with other regulations), including wetlands, and steep slopes.

Like the current approved project, the Modified Project is intended to be, and will be heavily marketed as, a second-home club community, in which the vast majority of residential unit owners are expected to be part-time residents who occupy their homes on weekends or for short vacation stays. A large-scale commercial component would not be consistent with the rural/recreational character of the resort community, and would neither be financially feasible, nor meet the Applicant's goals and objectives. A larger and broader retail commercial program would also compete with, and have potential adverse economic impacts on, the Hamlet of Amenia. The proposed commercial component appropriately advances the desired character of the community by "incorporating elements (a small general store, golf pro shop, restaurant, etc.) to fulfill the convenience needs of the part-time residents as it relates to the recreational and second home focus of the project" (see Mary Ann Johnson comment memo dated May 14, 2014). The proposed reduction in on-site commercial space compared to the current approved project will limit potential competitive impacts to the Hamlet and encourage additional patronage of hamlet businesses, creating the type of synergy between the new residents and existing hamlet businesses described in the Town Comprehensive Plan. These more modest, targeted commercial uses will complement existing uses in the Town, which will in turn be supported by approximately \$1.5 million of community resident spending on meals and food, \$700,000 on transportation and gas, and \$1.1 million on retail goods, annually. This revenue is vital to the economic growth of the Hamlet of Amenia and the region.

Due to the nature of the Modified Project as a second-home, resort community, it does not fully comply with the principles of TND, and a waiver of §121-12.1.F of the Zoning Code is therefore requested. For the reasons set forth above and in the memorandum addressing TND dated August 26, 2014, the Applicant submits that as permitted under §121.18.C(7) of the Zoning Code, the Modified Project complies with TND principles to the extent reasonably practical and appropriate, given the overriding objective of the RDO District to preserve natural resources, and the essential rural/recreational character of the resort community.



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22. Table 4 – Police, Fire and Emergency Medical Services section. In the Mitigation Measures for the Approved MDP, there is a statement regarding how exterior lighting will be used throughout the site. I suggest the Applicant modify that statement in the Additional Mitigation Measures for the proposed MDP as the lighting plan reflects exterior lighting in limited areas on the site.

Response MAJ-22: Table 4 has been revised to state that: "Exterior lighting will be used in limited areas of the site in accordance with Appendix E of the Amended MDP, in order to provide visibility in parking lots, security and safety on the site."

23. Comment 51 from my memorandum dated May 14, 2014 which references Table 4 and stated: "Page 35. Please be more specific for the reference "Some buildings will be visible..." by identifying the buildings that will be visible" was not fully addressed. Please provide a summary of the buildings visible from the hairpin turn in addition to referencing the Confirmatory Visual Analysis.

Response MAJ-23: Page 41 of the Addendum to the EAF has been revised as follows:

"The Amended MDP reduces the number of residential/lodging units visible from DeLaVergne Hill (Viewpoints 1 and 2) from 438 to 55 – please refer to the Confirmatory Visual Analysis for details. Currently, the dominant view to the south extends across the landscape of the golf course, to the natural skyline of folding hills beyond, with the agricultural and rural development patterns forming a middle ground. The most defining aspect of this view is the interface of the dark hued hilltops against the bright sky. The ridgeline will remain intact and the views to the distant hills will not be blocked."

24. Section V on Zoning Compliance still lacks specific details for how the project complies with the Aquifer Overlay District and only states "The Modified Project is not expected to have a negative impact on the AQO District with regard to water recharge and consumption". Additional information should be provided.

Response MAJ-24: Page 54 of the Addendum to the EAF has been revised to provide additional detail on compliance with the requirements of the AQO District.

Please refer to Response JSM-2.59.a.1. The Modified Project total calculated recharge of 496,070gpd is approximately 120,470gpd more than the consumptive demand of 375,600gpd.

25. Comment 54 from my memorandum dated May 14, 2014 which references Table 4 and stated: "Page 36 – Please reorganize this section to provide compliance details for each of the environmental overlay districts mentioned in the first full paragraph (Aquifer Overlay, Scenic Protection Overlay, Stream Corridor Overlay and Resort Development Overlay) using a format similar to what is provided for the Scenic Protection Overlay (see page 37)" has not been fully addressed. In the revised document, Pg. 39 provides the details of Stream Corridor Overlay District (§ 121-14) but does not describe how the project complies with the regulation. These details should be added. The same is true of the Aquifer Overlay District on pages 41-42.



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Response MAJ-25: Section V of the Addendum to the EAF has been revised and reorganized to provide compliance details for each of the environmental overlay districts. Please refer to Section V of the Addendum to the EAF.

26. Appendix F – the map showing the boundary to avoid the archaeological sensitive area shows grading in the 25 foot buffer.

Response MAJ-26: There is no grading within the 25-foot buffer; the plan has been revised accordingly.

27. I expect the NYS Office of Parks, Recreation and Historic Preservation (NYSORHP) will issue a letter regarding the archeological reports submitted to their office. The Applicant should provide all correspondence from NYSORHP.

Response MAJ-27: The Applicant has provided all correspondence to date and will continue to provide copies of all future correspondence with NYSORHP. Please refer to Appendix F of the Addendum to the EAF.

Site Plans

28. Please see item 15 above.

Response MAJ-28: Please refer to Response MAJ-15.

29. Sheet SL1.04 indicates there is no exterior lighting for the Parking Barns. Is this correct?

Response MAJ-29: There is exterior lighting proposed at the exits for each of the Parking Barns – Site Plan Drawing SL1.05 has been revised accordingly.

30. The lighting plans show that some of the larger parking lots (the golf maintenance and the overflow area near the family activity barn) do not light some of the parking area. Is that the intent?

Response MAJ-30: Yes, the lighting layout is shown as intended. Site Plan Drawings SL1.02 and SL1.08 have been revised and accurately demonstrate the desired level of lighting at these locations.

31. The plans do not offer information about the lighting for Estate Homes or the Golf Villas. Some of these homes will be visible and night-time lighting may be a concern. Does the Applicant have any guidelines for lighting in these areas? Issues for consideration should include fully shielded lights, motion detection lights, curfew and low levels of illumination.



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Response MAJ-31: Photometrics for the Golf Villas and other built product are shown on the Site Plan Drawings SL1.01 to SL1.08. It should be noted that lighting for all Estate Homes and the Golf Villas will be required to comply with the Lighting Standards set forth in Section 2.5 and Appendix E: Lighting of the Amended MDP. The Estate Home Design Standards require the submission of an exterior lighting and photometric plan to ensure that each home complies with the lighting standards set forth in Section 2.5 and Appendix E: Lighting of the Amended MDP.

32. Will there be any lighting associated with signs?

Response MAJ-32: There is no lighting at the signs.

33. I can only find signage on street related information (e.g. Stop, Parking, Speed, etc). However, I do not see signage for anything else such as building identification, entrance, etc. as described in the MDP. This information needs to be provided.

Response MAJ-33: Vehicular Identification signs for the Clubhouse and Family Activity Barn have been added to Site Plan Drawing C5.02 with details on Site Plan Drawing C14.07. Additional details for building identification signs and regulatory signage have been added to Drawing C14.07.

Please note that there is no entrance sign proposed.

Archeology report

34. The following paragraph can be found on page 139 of the submission to NYSOPRHP:
*In the same letter (June 18, 2008), Blakemore stated that no further work on the charcoal hearths was needed. However, she requested that ponds in the APE be avoided because they might be former ore pits. Dignacco (2009) supplied additional photographs of the Island Green pond and adjacent water bodies and they are reproduced here as Figures 8, 9, and 10. **Blakemore (2009) noted in her response to Dignacco that no additional work was needed as long as the pond contour was not impacted horizontally or vertically.** Brian Yates, NY SHPO reviewer, in discussion in July 2013, suggested that further research into ore production and processing in the Wassaic Valley area should be a focus in the Phase I survey of Parcels 1, 2, and 3. HPI (2014) has addressed this issue, and found no basis for a historical district in the Project area based on the elements identified to date. (emphasis added).*

It appears that the Applicant needs a letter from OPRHP rescinding the statement by Ms. Blakemore about the ponds and stating they agree with the conclusions reached by the Applicant's archeologist **before doing any of the proposed work** on the Island Green Pond. This is critical as I understand some of the golf course work is occurring in this area.



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Response MAJ-34: Wm. Brian Yates, Historic Site Specialist, NYS OPRHP, has confirmed that "HPI (2014) has addressed this issue, and found no basis for a historical district in the Project area based on the elements identified to date. It was determined that, while Island Green Pond and other ponds in the project area may have once functioned as ore pits, they have been modified since the cessation of the original mining operations".

Please refer to Appendices F.2 and F.4 of the Addendum to the EAF.

35. The Avoidance Monitoring and Unanticipated Discovery Plan section of the submission notes the Applicant will hire an Archaeological Monitor to be "in-the-field for all grading operations or construction activities within 100 feet of the Site - 82 archaeological buffer." Has this person been hired and approved by OPRHP? Again, I understand golf course work is occurring in the vicinity of this site but I am unsure how close to Site - 82.

Response MAJ-35: Wm. Brian Yates, Historic Site Specialist, NYS OPRHP, has confirmed that "After review of the submitted Plan, our office concurs with the proposed procedures and accepts the plan as part of the overall site treatment plan." The Archeological Monitor will be HPI.

Please refer to Appendices F.3 and F.4 of the Addendum to the EAF.

36. This submission should be included in the Addendum to the EAF so that all of the information submitted on archeology is in one location.

Response MAJ-36: Please refer to Appendix F of the Addendum to the EAF.