

### Section 3.3 Vegetation

**Comment 3.3-1-33L:** Every effort should be made to insure that no invasive plants be introduced to the site and that native species should be planted in all cases. A qualified expert should be hired to supervise the applicant in this effort. [David Reagon, Letter, March 20, 2008, Comment L, page 8]

**Response 3.3-1-33L:** Invasive plants are well established on the site. Construction and mitigation activities will provide for limited removal of established populations. Only native plant species will be used in the planting palettes for vegetative buffers, habitat restoration areas, and out-of-play areas within the golf course. This concern has been addressed in the Habitat Management Plan for the site (Appendix F). Planting and early maintenance schedules will be followed so as to minimize the colonization of disturbed areas by invasive species. All mitigation plantings in buffer areas and stormwater retention structures will be overseen by a qualified botanist.

**Comment 3.3-2-GP74:** Hudsonia produced a biodiversity map for the Town of Amenia; was this referenced or otherwise used for this DEIS? [Greenplan, Inc., Letter, April 6, 2008, Comment #74, page 13]

**Response 3.3-2-GP74:** The Hudsonia Report states that the Hudsonia habitat diversity map “should be used strictly as a general guide for land use planning and decision making” and that “site visits by qualified professionals should be an integral part of the review process for any proposed land use change.” For this project, and per the Planning Board’s resolution dated June 7, 2007 amending Sections 3.3 and 3.4 of the Final Scoping Document, the Applicant has been working with the Town’s Consultant, Dr. Michael Klemens, a recognized expert in ecology and biodiversity, and completed extensive field work on the property. The DEIS has referenced the Vegetative Cover Map that was prepared specifically for the property by the Applicant’s consultants. The ecological communities and significant habitats identified on the Vegetative Cover Map were characterized based upon site-specific conditions observed during numerous site visits conducted by the Applicant’s biologists, and they were described according to descriptions provided in Ecological Communities of New York State<sup>10</sup>. This analysis is site-specific, in accordance with the guidance of the Hudsonia Report and the Planning Board’s resolution dated June 7, 2007, and has been subjected to peer review by the Town of Amenia’s ecologists.

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<sup>10</sup> Edinger, G.J., D.J. Evans, S. Gebauer, T.G. Howard, D.M. Hunt, and A.M. Olivero (editors). 2002. Ecological Communities of New York State. Second Edition. A revised and expanded edition of Carol Reschke’s Ecological Communities of New York State. (Draft for review). New York Natural Heritage Program, New York State Department of Environmental Conservation, Albany, NY.136 pgs.

Considering that the biodiversity map prepared by Hudsonia is based largely upon map analysis and aerial photograph interpretations, and none of the communities mapped on the Silo Ridge Site were field verified by Hudsonia, the Vegetative Cover Map used in the DEIS, which is based upon site-specific field investigations, is a better reference for characterizing the existing ecological communities and identifying significant habitat features located at the property.

The Hudsonia Report identifies two generic resource categories and one specific "Priority Conservation Area," that are potentially present within the limits of the site. These include a) perennial streams; b) woodland ponds and c) forested areas. Working with Dr. Klemens, the Silo Ridge Habitat Management Plan identifies management buffers for these areas.

A 150-foot Stream Conservation Overlay district is identified along Amenia/Cascade Brook. This area has already been impacted through the removal of trees and mowing of grass along the Route 44 Corridor, and through the existing golf course along the western edge of the stream. As a result of consultation with the Town's consultants, a proposed stormwater management pond was relocated more than 100 feet from the Amenia/Cascade Brook. In addition, the project provides mitigative measures in the form of riparian restoration plantings in this area. As a result of consultation with the Town's consultants, development has also been moved 100 feet away from the headwater stream of Wetland J/JJ where the dusky salamander was identified. Please see Response 3.4-5-34H.

A 500-foot buffer has been established around the woodland pond Wetland U, and there is limited development within 750 feet of the wetland. See Response 3.4-6-34F.

While there is some encroachment along the bottom edge of the wooded ridgeline along the western slope of the Silo Ridge Property, the majority of this habitat is being preserved as open space.

**Comment 3.3-3-21A2:** [The identified issues of concern from the October 10, 2007 letter include: review of the photographs of the Cascade/Amenia Brook indicates an inadequate vegetative buffer adjacent to the current golf course facilities. Based upon review of proposed plans, the "green" and tee areas associated with the #4 hole are within less than 50 feet of the subject stream. These current and proposed conditions often contribute to adverse impacts including increased and decrease in dissolved oxygen. These conditions can be detrimental to trout spawning habitat. At this time, DEC staff would require an enhanced vegetative buffer in this location and requests restoration of the stream bank areas where this vegetative buffer has

been eliminated or substantially reduced.] [NYSDEC, Letter, January 14, 2008, Comment A2]

**Response 3.3-3-21A2:** Enhanced buffer plantings are proposed in the vicinity of Hole #4. Please refer to Response 3.2-22-GP37 and the Habitat Management Plan (Appendix F) for more details.

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