

Adverse Unavoidable Significant Environmental Impacts if the Project is Implemented (DEIS Section 4.0)

Comment 4.0-1-PHT: The other concern that I had, just sort of looking at this briefly, was under the impacts that the Applicant stated were inevitable were 115 plus acres of impervious surfaces on steep slopes. That is something I think should be really seriously reconsidered by the Town of Amenia and the Planning Board. There are wonderful little cobblestones that can be placed in sand so that runoff can be absorbed. The roofs can also use pervious surfaces. Rainwater can be harvested and used for irrigation on the roofs. You can do rain gardens on roofs to minimize runoff or near rain spouts. When I mentioned these LID practices, Dan Leary, the attorney, had actually not heard of them. So I've given him now a DVD which he's promised to show the Applicant. I would urge, because Maryland, Florida, and Massachusetts have much more sophisticated LID practices which now standard. The LEED practices for green building are much more state of the art. If the Applicant is going to claim to be a green eco-tourism hotel, they really should be using these practices. Also a part of the rain gardens could be to consider planting species that attract other desirable species that would delight the tourists, such as butterfly and hummingbird gardens. Again, with the rain gardens on the roofs, you can have a couple inches of soil on flat roofs that absorb the runoff and also provide insulation for heat and cold. [Tonia Shoumatoff, March 5, 2008 Public Hearing Transcript, page 21]

Response 4.0-1-PHT: The MDP for the project proposes approximately 37.5 acres of impervious surfaces (slightly less than 6% of the total site area) – considerably less than the 115 acres proposed in the original plan. Few if any of the impervious areas are on steep slopes. Also see Response 8.0-1-PHT, which addresses LEED certification, and Response 3.2-6-34B, which discusses LID.

Comment 4.0-2-GP134: There is no discussion of Significant Adverse Unavoidable Impacts for the preferred alternative. [Greenplan, Inc., Letter, April 6, 2008, Comment #134, page 24]

Response 4.0-2-GP134: The DEIS contained a discussion of the unavoidable adverse impacts (See Section 4.0) of the Proposed Action. The preferred action (Traditional Neighborhood Alternative) reduces the impacts described in the DEIS.

The proposed project, like any land development project, will have some adverse impacts on the environment that cannot be avoided if the project is implemented. Some of these are short-term impacts that will occur primarily during construction, most of which arise from the alteration of existing site

conditions. There are, however, others that would have permanent or long-term environmental impacts. Most of these are an unavoidable consequence of the development process and are not significant, or have been mitigated as described in the DEIS and this FEIS to a level not considered significant.

The following are adverse impacts that cannot be avoided if the project is implemented:

- Short-term construction-related impacts that will cease after construction is complete, including:
 - Increase in dust particles and minor increases in noise due to construction activity (short-term impact);
 - Increase in construction-related traffic and potential unavoidable delays to the traveling public due to the movement of trucks, machine transport vehicles, supply vehicles, and work crew vehicles (short-term impact); and
 - Replacement or disturbance of onsite soils during the course of development, including disturbance of approximately 105 acres of steep slopes (short-term impact);
- Increase in the amount of impervious surface (a total of approximately 37.5± acres or slightly less than 6% of the site) and alteration of stormwater runoff patterns (long-term impact);
- Loss of wetlands due to filling 0.05 acres of regulated wetlands and 0.06 acres of isolated wetlands (long-term impact);
- Increase in nighttime lighting at the project site (long-term impact);
- Increase in solid waste generation (long-term impact);
- Increase in wastewater generation (long-term impact);
- Increase in water demand (long-term impact);
- Increase in energy usage (long-term impact); and
- Increase in traffic (long-term impact).