

Growth Inducing Aspects (DEIS Section 7.0)

Comment 7.0-1-GP136: Please see the report dated February 14, 2008 from the Hudson Group for Section 7.0 –Growth Inducing Aspects. [Greenplan, Inc., Letter, April 6, 2008, Comment #136, page 24]

Response 7.0-1-GP136: The Hudson Group comments have been incorporated and responded to in the FEIS.

Comment 7.0-2-GP137: The FEIS should clarify that the 1,400 construction workers (indicated in Section 7.0 on Growth Inducements) would not be on the site at the same time. Typically manpower for a construction project fluctuates over the duration of the project in a bell-shaped curve (beginning and ending months have relatively low manpower, and middle of the schedule your manpower should peak). Is there a commitment by the applicant to utilize local labor and purchase materials locally? [Greenplan, Inc., Letter, April 6, 2008, Comment #137, page 24]

Response 7.0-2-GP137: Correct, the 1,400 jobs would not be anticipated to be on-site at the same time. This is an estimate of construction-related jobs over the course of the project timeframe. The Applicant will competitively bid and contract with all qualified and competent contractors and anticipates that will include many local trades. The Applicant anticipates some materials will be purchased locally and commits to allowing local qualified and competent material vendors to participate fairly in the bidding process.

Comment 7.0-3-5N: Other healthier development does not proceed, as it inevitably will in the absence of the Resort. [G.A. Mudge, Letter, March 19, 2008, Comment N, page 4]

Response 7.0-3-5N: Comment noted.

Comment 7.0-4-2B: While Amenia needs the jobs we hope this project might generate, we need to determine the cost and impact of the enlarged village infrastructure needed to support this greatly increased population. The number of future units at Silo Ridge, combined with the number of units proposed for Keane Stud, the Syms project, and Westerly Ridge, will create an explosion of overgrowth. How will Amenia handle the mushrooming demands? [Romia Kimball, Letter, March 24, 2008, Comment B, page 1]

Response 7.0-4-2B: The DEIS analyzes the potential impacts of the planned project on the Community's infrastructure. The DEIS and this FEIS document that the project will not have an adverse impact on the physical infrastructure of the Town. The project will have its own water supply and

wastewater treatment system, fully paid for by project residents. The project's roadways will also be private and therefore will not burden the Town in terms of maintenance costs.

Further, the project is consistent with the local zoning, the Town's Hamlet Plan, and the Town's Comprehensive Plan which incorporate a number of growth management tools. The Town's Comprehensive Plan Update (July 19, 2007) contemplated the growth pressures affecting the Town and in the circumstance of the subject project embraced the planned growth provided that the project was developed in harmony with the community's vision and goals. The Town ultimately adopted the RDO district as a part of enhanced growth management tools included in the Town's land use regulations to ensure the development would be consistent with the Town's Comprehensive Plan. As noted elsewhere, the Comprehensive Plan and the RDO recommend the concentration of development in certain locations in order to preserve large areas of open space in other places. By designating areas of the Town for growth (through zoning) and utilizing design principles such as the TND, the Town has proactively addressed the impacts of growth and effectively reduce the demands for infrastructure.

The TND and compact design practices were developed (in part) as a means of minimizing impacts on the rural landscape. The project incorporates these principles as a method of minimizing impacts to the landscape and community character. Please see Response 7.0-7-HG58.

Comment 7.0-5-HG17: The DEIS is lacking in sufficient background data and analysis on the potential growth inducing effects from the Project for the Town of Amenia. The estimated residents of the Project, be they full-time or part-time, will increase the Town's population by about 22 percent and they will have high incomes and spending potential. Given the Town's current small base of stores and commercial establishments, there could be a significant demand for increased commercial establishments and land uses. [The Hudson Group LLC, Letter, February 14, 2008, Comment #17, page 3]

Response 7.0-5-HG17: A number of individuals commenting on the DEIS expressed the opposing concern – that the residents of the project would not utilize the services located within the Town's hamlet. The applicant has provided a response to address that issue in the Community Character Section (please see Response 3.19-2-PHT) expressing that there will be potential for positive impacts on the hamlet as a result of new business opportunities triggered by the action. The Town recently updated its Comprehensive Plan (2007), and that the project was contemplated within that document (See Response 7.0-4-2B) and the community has expressed a

desire for properly planned residential projects that will serve to enhance the community's economic base.

The Town recently commissioned the preparation of the "Amenia Hamlet Concept Plan" (Hamlet Plan) prepared by Dodson Associates, LTD (available on the Town's website). The Hamlet Plan identifies a series of options for the Town to consider with respect to preserving the character of the hamlet while promoting opportunities for redevelopment and infill development. The plan notes that the Town's "innovative new comprehensive plan and zoning regulations provide a solid foundation for this future growth" (Summary Page 1) and that it is within the Town's control to ensure that development within the hamlet be completed in a fashion that will complement the existing character of the community. Please also see Response 7.0-7-HG58.

Comment 7.0-6-HG57: We find this Chapter lacking in sufficient background data and quantitative analysis on the potential growth inducing aspects for the rural Town of Amenia. The total estimated residents of the Project, full-time or part-time, will increase the town's population by about 22 percent (based upon the Census Bureau estimate of town population in 2005). With the substantial household incomes required to purchase homes in the facility, there are significant growth inducing implications for commercial development (retail, restaurants and services and etc). Residents, be they primary or secondary, and also the many time share owners using the hotel, and other visitors to residents, will have substantial spending power and, notwithstanding the services provided on site, there could be a demand for increased commercial facilities and services nearby. [The Hudson Group LLC, Letter, February 14, 2008, Comment #57, page 15]

Response 7.0-6-HG57: Please see Response 7.0-5-HG17.

Comment 7.0-7-HG58: The Town and close by communities currently have a small, current base of such commercial facilities. For example, we found that in the Amenia, Wassaic (about 5 miles from project) and Sharon CT (also about 5 miles away) zip codes areas the following establishments were counted in 2005:

<u>ZIP CODE</u>	<u>Retail Trade*</u>	<u>Restaurants**</u>
Amenia, 12501	12	8
Wassaic, 12592	None listed	3
Sharon, CT. 06069	13	2

*NAIC code 44-45

** NAICS code 722, include full service and fast food type restaurants

Source: US Census Bureau, County Business Patterns, Zip Code data for 2005, Online:
www.census.gov/epcd/cbp

Other communities with some commercial centers are further away; within about 12 miles, but not in Amenia are Millerton, Millbrook and Dover Plains. We do note that in Chapter 3-12 in the discussion under tourism, pages 3-12-6 and 3-12-7, there is a discussion of the tourism stimulation from hotel guests. Estimates are derived from a Marist College study of the spending of...“approximately \$2 million on meals and food, \$800,000 on transportation and gas, and \$1.5 million on retail goods annually, much of which is expected to occur locally and within the region” (page 3-12-7). The tourism discussion notes that “This is a significant positive impact for the Town and region” (also page 3-12-7). This could be, but Chapter 7.0 on Growth Inducing is mute on the implications of such spending. We recommend that the Applicant provide estimates of household consumer spending generated under both the primary full-time residents and second home scenario, to add to the hotel residents spending estimates. All these spending estimates would need to be analyzed in the context of the capability of nearby commercial facilities to service this demand. Any gap should be analyzed in the context of additional square footage of commercial space needed to service the excess demand. [The Hudson Group LLC, Letter, February 14, 2008, Comment #58, pages 15-16]

Response 7.0-7-HG58: The Hudson Group prepared an analysis of potential local household spending impacts of future Silo Ridge Resort residents under the worst-case scenario of all full-time, year-round residents (see Appendix H for a copy of the correspondence). The Hudson Group estimated that if the project were to function as a full-time residential community, it could generate demand for approximately 70,000 SF of additional commercial and retail development in a 10-12 mile radius of the site. Much of this could be absorbed by existing retail facilities in Amenia and nearby communities. Some would be fulfilled by the proposed onsite retail, and some could be located within the hamlet area according to the Town’s hamlet plans currently being developed. A second-home scenario for the Silo Ridge project would generate demand for approximately 14,500 SF of commercial and retail space.

Comment 7.0-8-HG59: An issue of concern for possible second home residents is the amount of time they would spend in Silo Ridge. On the bottom of page 3-18-7 and continued on the top of page 3-18-8 the statement is made that second home buyers... “generally use their homes for a total of one month a year”. While this figure is referenced in footnote 81, we note that a month equals 30 days, which is but 8% of 365 days and translates into only 15 weekends per year. Studies and articles we have reviewed on upscale resort-based second homes, especially those used by early retirees and semi retirees - and even working couples as a home/office - are frequented much more than 8 percent annually. Therefore, any development of local/regional spending levels and patterns of second home owners at Silo Ridge must be based upon agreed upon input assumptions and data. [The Hudson Group LLC, Letter, February 14, 2008, Comment #59, page 16]

Response 7.0-8-HG58: The DEIS assumed year-round occupancy of the project as a means of presenting a conservative estimate of population; however, the DEIS acknowledges that it is likely that the frequency of occupation of the units would be much less than full-time or year-round and thus any potential population-related impacts would be reduced compared to those of a full-time residential community. We agree that the spending habits and potential positive economic impacts will be directly related to frequency of occupation. See Response 7.0-7-HG58 regarding the analysis required by the Planning Board. It should be noted that the DEIS (in Section 1.6) presented a general description of the kind of economic benefits that are likely to be realized from the tourist and visitor population at the proposed hotel. That analysis assumed a hotel occupancy of 50%.

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