

Section 3.18 Demographics

Comment 3.18-1-PHT: It is suggested that on a worst-case basis, 1079 people are contemplated to be the occupants of the new 359 units, excluding the hotel. If you assume 1 person per bedroom, except for the master bedroom which would have 2, the number I come up with based on Table 1-1 is 1,318. [Bart Wu, November 17, 2007 Public Hearing Transcript, page 90]

Response 3.18-1-PHT: There may be some units which have an occupant in each bedroom and two in the Master bedroom; however, it is not realistic to posit that every unit will be occupied to that extent at the same time. Every house in Amenia is not fully occupied, nor is it reasonable to think they all would be. Similarly, it is not reasonable to assume that every unit in the Silo Ridge development would be fully occupied. Demographic multipliers account for variations in household size among different kinds of units, taking into consideration location, type of unit, and price of unit.

Nevertheless, the population projections have been revised according to input from the Town's consultants. It should be recognized that these population projections are based on the worst-case scenario where all homes are utilized as primary residences. As a resort-oriented community, the proposed residences are expected to be utilized largely as vacation or second homes; thus, the actual project population is likely to be considerably less than the projections.

Comment 3.18-2-PHT: The DEIS says that the total number of households is somewhere between 1625 and 1814. What that really means is that you are almost effectively doubling the number of households in Amenia by enactment of this plan. Whether you supplement it with what the condominium aspects of the hotel would be, that would increase the numbers even more. [Bart Wu, November 17, 2007 Public Hearing Transcript, page 90]

Response 3.18-2-PHT: The number of households on the project site would be 338, the number of residential units proposed (as of the April 2008 MDP). As discussed throughout the DEIS, it is highly unlikely that all of the residential units will be occupied on a year-round basis and therefore, the increase in the number of permanent households is expected to be much less than 338. Furthermore, the hotel units are not considered households, as by definition they cannot be occupied on a permanent, full-time basis. Please refer to Response 5.3-13-PHT.

Comment 3.18-3-PHT: I would like to understand better what silo ridge is doing to meet the requirements for affordable housing. [Mark Doyle, November 17, 2007 Public Hearing Transcript, page 81]

Response 3.18-3-PHT: Please see Response 2.1-12-GP25.

Comment 3.18-4-PHT: The workforce will compete for local housing. I've seen it happen. I've been priced out of Darien CT and Litchfield. I'm a middle class working person and it will affect us. If we don't have more affordable housing, people are going to be pushed out of town. It's easy for towns to take money and fees in lieu of having a developer provide housing. Developers would rather not provide that housing and I've seen it. [Cheryl Morse, November 17, 2007 Public Hearing Transcript, page 144]

Response 3.18-4-PHT: Please see Response 2.1-12-GP25.

Comment 3.18-5-PHT: I'm concerned about affordability of housing. I don't know what is intended. I would prefer, rather than for the project to create affordable housing externalities or things that the town is going to have to deal with itself into the limited housing that the town currently has, I would rather see those affordable housing implications integrated inside the community itself. If anything, that would make it less of a gated community, which I think many people are concerned about. The worst thing, I think, as far as affordable housing would be, if we were to create a worker class and families of those workers that would be in effect competing with existing town residents for what's obviously a very limited pool of affordable housing into the town generally. Much better and more affordable housing can be built within the community. [Michael Chamberlain, November 17, 2007 Public Hearing Transcript, page 107]

Response 3.18-5-PHT: Please see Response 2.1-12-GP25.

Comment 3.18-6-PHT: The other thing is alternative housing. I'm not sure that the people who live in this community are going to be considering living at Silo Ridge, for a number of reasons. The people who are here who do have the money to be able to afford the type of housing, I'll tell you personally, I don't think they want to live in this type of development. If they did, they'd be living in Scottsdale, AZ, Hilton Head SC, or somewhere in Florida. It is certainly not the average middle-class person living in Amenia. So it is not like they are building housing for all of us. They are building housing for somebody else. [Steven Benardete, November 17, 2007 Public Hearing Transcript, page 69]

Response 3.18-6-PHT: Comment noted. The marketing study included in Appendix D describes the anticipated market for the project. Also see Response m-11-29A.

Comment 3.18-7-GP129: The discussion on demographics does not address the significant impact a 25% increase in the Town's population will have on the Town. In addition, there is no discussion of the cumulative impacts of the Syms, Depot Hill and this project. [Greenplan, Inc., Letter, April 6, 2008, Comment #129, page 23]

Response 3.18-7-GP129: As required by the Final Scoping Document, the project was analyzed based on a worst-case scenario in which all of the residences are occupied on a full-time, permanent basis. The population analysis presented in the DEIS, as well as all issues that are population-dependent, such as water demand, wastewater generation, and community services, is based on this scenario. This results in a conservative projection of potential impacts. However, the project is intended to be a vacation-oriented resort community where most of the residential units are expected to be occupied on a part-time basis; therefore, the actual increase in resident population in the Town is expected to be significantly less than 25%.

The Syms project is a 19-lot subdivision for which SEQR Findings were adopted by the Town of Amenia Planning Board in late 2005. The potential population growth from that development would be captured in general background growth rates for the Town. With respect to Depot Hill, which was proposed well after the commencement of the SEQRA review herein, that project is presently undergoing its own full SEQRA review. The Planning Board will weigh the information contained in the Depot Hill project in evaluating cumulative impacts.

Comment 3.18-8-HG6: The DEIS estimates of maximum population and public school children generated by the Traditional Neighborhood Alternative, the design preferred by the Applicant, are different from the results using the preferred methodology that we utilized. The differences are very small for the population, but could be significant for public school children. This significance is linked to the issue of the DEIS possible overestimation of the Project's property tax revenues for the school district. [The Hudson Group LLC, Letter, February 14, 2008, Comment #6, page 2]

Response 3.18-8-HG6: Through discussions between the Applicant, the Planning Board, and the Planning Board's consultants, the number of 96 public school children was ultimately agreed to as a reasonable projection of the project's potential school children population. The results of the revised fiscal impact analysis using this number are presented in Appendix H.

Comment 3.18-9-HG7: The DEIS does not show key demographics associated with potential buyers of the residential units, besides estimating population and school age children. Absent is the average or median incomes and age groups for buyers of different dwelling unit and size types. Such information would refute the DEIS

findings that Project residents and users will not likely significantly change the demographics of Amenia. We expect that the household incomes required to purchase Silo Ridge residential units need to be much/much higher than the median incomes of existing Town resident households. [The Hudson Group LLC, Letter, February 14, 2008, Comment #7, page 2]

Response 3.18-9-HG7: The marketing study provided in Appendix D describes the anticipated market for the project, including the estimated required incomes to purchase units in the development and buyers' likely age groups. Also see Response m-11-29A.

Comment 3.18-10-HG13: Webutuck School District. The methodology in the DEIS of determining the added cost of Silo Ridge students by using solely the existing per capita tax property tax levy is not an acceptable methodology. To estimate the cost impact, existing school district expenditures data must be used and those school costs determined which will increase as a result of an increase in the student population of 11.6% resulting from the Silo Ridge Project. [The Hudson Group LLC, Letter, February 14, 2008, Comment #13, page 3]

Response 3.18-10-HG13: Please see Responses 3.11-4-5H and 3.17-4-PHT. The analysis was revised using the agreed upon methodology. The results are included in Appendix H and show that the project will still generate a tax revenue surplus to the WCSD.

Comment 3.18-11-HG14: Webutuck School District. In the DEIS no determination is made as to whether the existing physical facilities of the Webutuck School District are adequate to accommodate 103 new students. [The Hudson Group LLC, Letter, February 14, 2008, Comment #14, page 3]

Response 3.18-11-HG14: The DEIS relied on information provided by the Webutuck Central School District in its analysis of potential impacts to school services. Enrollment and capacity data were obtained from the WCSD and are summarized in Table 3.11-1 of the DEIS. As noted, with a total 2005-2006 school year enrollment of 902 students and capacity for 1,771 students, there was excess capacity for an additional 869 students within the District's existing facilities. The District's Long Range Facilities Plan (2005) describes some changes to the existing schools, including programming and organizational changes, but no increases in capacity since there is considerable excess capacity already. Please also see Response 3.11-1-PHT and the updated fiscal impact analysis in Appendix H.

Comment 3.18-12-HG15: Webutuck School District. The assumption is made in the DEIS that state aid, federal aid, and other revenues will increase in direct proportion to the cost increase. This is definitely unrealistic. State aid, in particular,

will be dramatically adversely impacted by the Project, whether or not additional students come from Silo Ridge. Basic school aid formulas are based on property wealth and household income. The Project will dramatically increase both the property wealth and household income of the school district area. It is critical that the school aid under existing formulas be recalculated with data on the Silo Ridge added property value, the estimated household income, and the additional students. The result can then be compared with existing state aid to determine the potential influence and effect of the Project on school aid. [The Hudson Group LLC, Letter, February 14, 2008, Comment #15, page 3]

Response 3.18-12-HG15: Please see Response 3.11-4-5H.

Comment 3.18-13-HG16: Webutuck School District. Without a determination of the impact of the Silo Ridge development on state aid for the Webutuck School District its fiscal impact cannot be determined. [The Hudson Group LLC, Letter, February 14, 2008, Comment #16, page 3]

Response 3.18-13-HG16: Please see Responses 3.11-4-5H.

Comment 3.18-14-HG48: Webutuck School District Improvement. The Silo Ridge development will have a very significant impact on the Webutuck School District. The enrollment for the 2005-2006 school year was 891 (data from the Office of the State Comptroller). Information on enrollment for the 2006-2007 school year is not yet available. The Silo Ridge development with primary residents according to our estimates would add 103 public school-aged pupils. This is an 11.6% increase. The first question that must be asked is whether the existing school facilities are capable of adding a 11.6% increase in students without physical expansion and capital improvements. The adequacy, or lack thereof, of the physical facilities of the Webutuck School District are not addressed. This is a glaring omission which needs correcting. [The Hudson Group LLC, Letter, February 14, 2008, Comment #48, page 12]

Response 3.18-14-HG48: Please see Response 3.11-1-PHT. The District's facilities are approximately 50% utilized.

Comment 3.18-15-HG49: The methodology used to estimate the additional costs to the Webutuck School District is not an acceptable one and it cannot produce a valid result. The assumption is made that as expenditures increase each revenue category (property taxes, state aid, federal aid, interest, and other revenues) will rise in the same proportion as currently exists. This simply will not and cannot happen. None of the non-property tax revenue sources can be expected to rise proportionately with the expenditure increases resulting from the addition of the Silo Ridge students. The property tax, of necessity, will have to bear a larger percentage of school costs. It is not acceptable to divide the property tax levy by the

existing student enrollment and state that this will be the added cost of each of the Silo Ridge students. [The Hudson Group LLC, Letter, February 14, 2008, Comment #49, page 13]

Response 3.18-15-HG49: Please see Responses 3.11-4-5H and 3.18-18-HG52.

Comment 3.18-16-HG50: An item of major concern is school state aid. In 2005-2006 state aid was \$ 5,791,538, which was 34.5% of total revenues and \$6,500 per student. State aid will not increase proportionately to student enrollment. While state aid in the aggregate may increase (again it may not), state aid on a per student basis will decrease. The State aid formula to a very significant degree is tied to property wealth and household income. As property wealth per student and/or household income per student increases, state aid is correspondingly reduced. Conversely, the poorer a district, the greater its state aid per student. The Silo Ridge development will add significantly to the property wealth of the Webutuck School District. For the 2005-2006 school year the full value of the Webutuck School District was \$743,439,886, which is \$834,388 per enrolled student. The Silo Ridge development is estimated to result in a net increase in full value to the Webutuck School District of \$647,094,000. The market value of the Silo Ridge development is thus 90.7% of the value of the entire Webutuck School District in 2005-2006. The market value within the Silo Ridge development behind each student coming from Silo Ridge is \$6,282,466 (\$647,094,000/103). When the market value and new students from Silo Ridge are added into the Webutuck School District the full value behind each student becomes \$1,398,927, a 67.7% increase over the existing full value per student. This fact alone will have a very dramatic negative impact on the per capita school aid received by the Webutuck School District. [The Hudson Group LLC, Letter, February 14, 2008, Comment #50, page 13]

Response 3.18-16-HG50: Please see Response 3.11-4-5H.

Comment 3.18-17-HG51: Another component of the basic school aid formula is a factor for household income. While this factor may not be as influential in reducing per student state aid as property wealth, it nevertheless will have a significant impact. The median household income for the Webutuck School District according to the 2000 Census was \$42,300. Given the proposed Silo Ridge housing unit prices, the household incomes of the Silo Ridge property owners will be substantially greater than the incomes of the current households in the Webutuck School District. The 2006-2007 school aid formulas were significantly changed. To know and have a true understanding of the impact of the Silo Ridge development on school aid, the 2006-2007 formulas should be rerun calculating what the state aid would have been had the \$647.1 million in new market value been included, the 103 students added, and the estimated household incomes of the Silo Ridge property owners added to

the household income base for the Webutuck School District. Without good state aid estimates it is impossible to determine the overall fiscal impact of the Silo Ridge Development on the Webutuck School District. [The Hudson Group LLC, Letter, February 14, 2008, Comment #51, page 13]

Response 3.18-17-HG51: Please see Response 3.11-4-5H. See also Response 3.18-18-HG-52.

Comment 3.18-18-HG52: For 2005-2006 the expenditures per Webutuck School District student were \$20,496 (\$18,261,973/891). Because of certain fixed costs the expenditures per student for adding Silo Ridge students will be less (assuming no physical facility problems). Certain costs, such as debt service, will not be affected by additional students. Other costs, such as instruction, will be directly and proportionately affected. Costs, such as transportation, may have operational efficiencies which will slightly reduce the per pupil cost. Operation and maintenance of the physical facility, on the other hand, may have only modest additional costs as a result of the new students. The 2005-2006 expenditures of \$18,261,973 in the Webutuck School District has been allocated between fixed and variable for estimating the costs of new students. It is estimated that about \$14.0 million (76.7%) are variable costs and \$4.3 million (23.3%) are fixed. The variable cost per student in 2005-2006 are \$15,728. This cost multiplied times the 103 Silo Ridge public school-aged students results in an additional cost of \$1,619,984. This is nearly a \$650,000 higher than the \$974,000 produced by only looking at the property taxes raised per student in estimating additional costs. [The Hudson Group LLC, Letter, February 14, 2008, Comment #52, page 14]

Response 3.18-18-HG52: The Applicant prepared an updated fiscal impact analysis in response to comments received on the DEIS (see Appendix H). In the updated analysis of potential impacts to the WCSD, the District's variable costs were used, as recommended by The Hudson Group. The analysis is based on the 2007-2008 school budget, the January 2008 District enrollment, the 2007 property tax rates, and the 2007 property tax payments for the Silo Ridge project site, as well as the reduced development program identified in the April 2008 MDP. The analysis is based on the agreed-upon projection of 96 public school children. Appendix H also includes an analysis prepared by the Planning Board's fiscal consultant of potential changes in State Aid that could result from the proposed project. In all cases analyzed, the project would be fiscally positive to the WCSD.

Comment 3.18-19-HG53: Before the true fiscal impact of the Silo Ridge development on the Webutuck School District can be determined, two key questions must be answered. First, are the housing unit prices used to determine the \$5,541,235 in new school property tax revenues defensible and supportable? If not, what market value can properly be ascribed to the Silo Ridge project? Second, what

will be the effect of the Silo Ridge development on State school aid? [The Hudson Group LLC, Letter, February 14, 2008, Comment #53, page 14]

Response 3.18-19-HG53: Please see the marketing study in Appendix D, which substantiates the market values and strength of the market for the proposed development. Please also see Response 3.11-4-5H regarding impacts to the amount of State aid received by the WCSD. Also see Response m-11-29A.

Comment 3.18-20-HG31: Chapter 3-18 describes in some depth the demographics characteristics of households and residents of the Town of Amenia, using mainly 2000 and 1990 Census data. There is data in this Chapter (table 3.18.10, page 3-18-6) on the income distribution for Town households from the 1990 and 2000 Census. The narrative describes the growth in median income of households between these Census years and the growth in numbers of higher income households over the decade in the Town. However, the 2000 Census median household income of \$39,136, which is compared to the 1990 figure of \$31,136 and “represents a 26% increase from 1990” has NOT been adjusted for inflation effects and converted into constant dollar changes. We have done the conversion using two different price indexes. The most common index used is the overall consumer price index (CPI). Adjusting the Census 2000 figure (actually its 1999 income data and 1989 income data for the 1990 Census) with the US CPI change results in an adjusted 2000 median household figure of \$29,276 (in 1990 dollars – Source is the Online Economic Report of the President 2007, Statistical Table B-60). Most professional economists prefer using the overall Personal Consumption Expenditures (PCE) price deflator in the GNP data sets. Using this results in a slightly higher adjusted Town median household income of \$30,890 (in 1990 dollars – Source is the Online Economic Report of the President 2007, Statistical Table B-7). Both 2000 adjusted Town household median income figures show NO increases from 1990. In fact, both show decreases in real income growth! Therefore, the entire DEIS income related discussion on page 3-18-6 needs “data cleansing.” We do however believe (undocumented because of the absence of data) that it is likely that currently in 2007 the median town resident household income level is higher than the 2000 figure, in both real and none inflation adjusted levels. However, the 2000 median household income (unadjusted for inflation) and any current, updated estimates would be way beneath the income levels needed to buy any of the Silo Ridge residential units at their proposed selling prices. The generic statement on the bottom of page 3.18-7 regarding typical second home buyers as having “household incomes greater than \$75,000,” is too opened ended and not applicable, given the prices being proposed for the Silo Ridge Resort housing units. [The Hudson Group LLC, Letter, February 14, 2008, Comment #31, page 8]

Response 3.18-20-HG31: The comments regarding income levels and inflation are noted. Please see the marketing study included in Appendix D.

This report is a compilation of considerable market research that has been conducted which illustrates the depth of the market for the proposed type of development. The study also discusses the income requirements of purchases to be able to afford a unit within the development. Furthermore, it describes the geographic market for the project as extending beyond Amenia into surrounding counties and the New York City and northern New Jersey areas. Also see Response m-11-29A.

Comment 3.18-21-HG32: The Applicant needs to provide estimates of the demographic market associated with potential buyers/residents of the housing units in the Project, and not just estimates of total population and school age children. Key information that should be supplied is average or median incomes and age group for head of households by dwelling unit types. We believe providing this information would refute the statement made in the DEIS Executive Summary, "Demographics," Table 1-4 page 1-23, (and elsewhere in the DEIS) that... "The future resident users of the proposed project are not likely to significantly change the demographics of the Town." Income levels required to purchase any of the residential unit types in the Silo Ridge Resort would have to be much higher than the median incomes of town households, currently and near term as estimated from the 2000 Census. [The Hudson Group LLC, Letter, February 14, 2008, Comment #32, page 8]

Response 3.18-21-HG32: Comment noted. Please see Response 3.18-20-HG31. The Applicant acknowledges that in general, buyers within the Silo Ridge project will have different income characteristics than the existing population in Amenia. However, as discussed in the DEIS, the project is not intended to a primary home community.

Comment 3.18-22-HG33: For the proposed nearby Carvel Project in Pine Plains, that was discussed previously, the Applicant in their DEIS uses an average household income of \$500,000 for the proposed secondary home purchasers and for the primary home scenario states that the minimum household incomes would range from \$120,000 to \$320,000 depending upon the selling prices of different dwelling types. (Sources: Chapter 14- Community Services and fiscal Impacts, June 2005 / Revised August 2006 / draft #2, Table 14-62, page 14-128, and Table 14-64, page 14-129). We earlier noted that the proposed selling prices for the Silo Ridge Resort's units would be much higher than Carvel's. Therefore, the income levels shown for Carvel are very conservative relative to the household incomes needed to purchase Silo dwelling units. NOTE: In the DEIS, Chapter 3 on page 3-18-1, the following is said, "The population of Amenia declined by 22% between 1990 and 2000; however, there has been a modest population increase in recent years, with continued growth predicted in the future...." With a little bit of online Census research it would have been discovered that this 1990-2000 decline was due to the closing of a State mental health facility in Wassaic, with a 1990 population listed in

group quarters of 1,206. The population living in households in the Town in 1990 was 3,909 and in 2000 the comparable figure was 3,991. [The Hudson Group LLC, Letter, February 14, 2008, Comment #33, pages 8-9]

Response 3.18-22-HG33: Please see the marketing study in Appendix D for a revised discussion of income levels required to purchase units within the Silo Ridge project. The Applicant acknowledges that the decline in population between 1990 and 2000 was largely due to the closure of the State mental health facility. Please see Response 7.0-5-HG17. Nevertheless, the notable point is that the DEIS recognizes the likelihood of continued growth in the future. Also see Response m-11-29A.

Comment 3.18-23-41LLa: The use of the term "worst-case" is a misnomer inasmuch as it is based on assumptions that rely on state-wide multipliers, which are not specific to the eastern portion of Dutchess County or to the Town. Additionally, such multipliers may not be relevant where, as here, the types of housing in the Project differs from the type of housing throughout the Town, and the demographics and market of prospective purchasers may be different for the Project than the demographics and market of prospective purchasers of other properties located within the Town. Just as the number of rooms or units varies in its analysis, the Sponsor also juggles the maximum number of residents in its analyses. For example, under the Traditional Neighborhood Alternative, the Sponsor claims that the maximum number of residents it considers as its Maximum Estimated Population at Full Buildout (DEIS Table 5-19) to be 901. However, for purposes of Projected Wastewater Flows the Peak Hour Head-Count is 959, excluding the hotel, and 1,559 inclusive of the hotel. (DEIS Table 5-15). A more analytically valuable "worst-case" scenario for the Town contemplates that each unit is occupied by full-time residents and every bedroom is occupied; the first or master bedroom being occupied by a couple and each additional bedroom being occupied by at least one dependent, presumably child for purposes of this analysis. Based on these "worst-case" assumptions, there would be 459 occupants of Flats, 584 occupants of Townhouses, 124 occupants of 3-bedroom villas, 115 occupants of 4-bedroom villas, and 36 occupants of 5-bedroom villas, for a "worst-case" total of 1,318 additional occupants/residents of which there could be as many 600 school aged children. [Bart Wu, Letter, March 25, 2008, Comment LLa, page 8]

Response 3.18-23-41LLa: Please see Responses 3.17-4-PHT and 3.18-1-PHT.

Comment 3.18-24-41LLb: Isn't it possible that each household could have a resident occupy each bedroom inasmuch as that is the purpose for which they were designed? [Bart Wu, Letter, March 25, 2008, Comment LLb, page 8]

Response 3.18-24-41LLb: Please see Responses 3.17-4-PHT and 3.18-1-PHT.

Comment 3.18-25-41LLc: Isn't it possible that each unit's purchaser could be composed of a married couple/partner? [Bart Wu, Letter, March 25, 2008, Comment LLc, page 9]

Response 3.18-25-41LLc: Please see Responses 3.17-4-PHT and 3.18-1-PHT.

Comment 3.18-26-41LLd: Isn't it possible that each household could have school-aged children? [Bart Wu, Letter, March 25, 2008, Comment LLd, page 9]

Response 3.18-26-41LLd: Please see Responses 3.17-4-PHT and 3.18-1-PHT.

Comment 3.18-27-41LLe: Isn't it possible that each household could have at least one school-aged child per bedroom that is in addition to the couple/partners occupying one bedroom? [Bart Wu, Letter, March 25, 2008, Comment LLe, page 9]

Response 3.18-27-41LLe: Please see Responses 3.17-4-PHT and 3.18-1-PHT.

Comment 3.18-28-41LLf: Isn't it possible that each household could declare their respective units as their primary residency, and occupy their respective units as permanent residences? [Bart Wu, Letter, March 25, 2008, Comment LLf, page 9]

Response 3.18-28-41LLf: As required by the Final Scoping Document, the analysis in the DEIS evaluated the potential impacts of the proposed development as if all units were occupied on a permanent basis. However, market research suggests that this is highly unlikely.

Comment 3.18-29-41LLg: How many bedrooms will each condominium unit in the hotel have available? Assuming a couple occupies the first bedroom and a school-aged child occupies each successive bedroom unit, how many possible full-time or permanent residents could the hotel have? [Bart Wu, Letter, March 25, 2008, Comment LLg, page 9]

Response 3.18-29-41LLg: The hotel will consist of one-, two-, and three-bedroom units. By definition in the Town's Zoning Law, the hotel will not be able to have any permanent residents. Please see Response 5.3-13-PHT.

Comment 3.18-30-41LLh: If the answers to any of the above questions 34 through 39 [LLb through LLg] is "no" or "none", would the Sponsor please provide an explanation for its answers, and provide quantitative evidence to support its explanation? If its proposed association documents, offering materials or other documents specifically prohibit family households from purchasing units in the Project, would the Sponsor please provide copies of all such documents to the Board

and in its response and highlight the pertinent passage from prohibiting such occupancy? [Bart Wu, Letter, March 25, 2008, Comment LLh, page 9]

Response 3.18-30-41LLh: Nothing will prevent families from purchasing units in the Silo Ridge development. The marketing study in Appendix D provides demographic and market research showing that residential units in Silo Ridge are more likely to appeal to couples without children or older “empty-nesters,” or to families looking for a vacation or second-home getaway rather than a permanent, primary residence. Nonetheless, as stated previously, the DEIS evaluated the potential impacts of the project as if all residential units were occupied as permanent residences, using accepted demographic multipliers to project population. Also see Response m-11-29A.