

**Appendix F-3**  
**Group for the East End Letter and Reduced Impact Alternative**

March 31, 2017



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March 31, 2017

Supervisor Jay Schneiderman  
And Members of the Southampton Town Board  
Southampton Town Hall  
116 Hampton Road  
Southampton, New York 11969

**The Hills at Southampton, Multi Use Planned Development District  
Draft Environmental Impact Statement**

Dear Supervisor Schneiderman and Town Board Members,

I submit the following comment letter on behalf of Group for the East End. This letter serves primarily to consolidate our prior testimony and written submissions provided during the public hearing phase of this review. For the record, the Group represents the conservation and community planning interests of more than 1500 member-households, businesses and individuals from across the East End with the majority of our membership residing in Southampton Town.

For the better part of the last year, Group for the East End has participated in the technical review of the subject action and most specifically in the contents of the Draft Environmental Impact Statement (DEIS). In addition to our own experienced reviewers, we have also engaged highly qualified technical experts in the areas of groundwater hydrology, municipal planning and conservation design to provide the Board with a thorough assessment of the most critical environmental impacts associated with this project.

In brief, based on our overall review of this proposal and all attendant review materials, we oppose the approval of this application for the following reasons.

1. The proposed action does not provide any intrinsic community benefit such as affordable housing, eldercare facilities, daycare facilities, or a public park, which is a fundamental objective of the Planned Development District law.
2. We do not believe the project and its assembled "community benefits" will in any way, achieve a level of long term economic value in the community that is commensurate with economic gain that will be received by the applicant should it secure the desired change of zone. We hold that this comparative assessment is essential to determining whether or not a Planned Development District can be approved.

F-3.1  
Sec. 3.2.2

F-3.2  
Sec. 3.2.2

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|----|--|---------------------|
| 3. | Each of the primary mitigation measures proposed in the desired plan (such as the transfer of density among parcels, lot size reduction, the set aside of undeveloped areas, the installation of stormwater runoff controls, seasonal occupancy, and the installation of active wastewater treatment) could be achieved through the proper application of the New York State Environmental Quality Review Act (SEQRA), without the attendant increase in the density and use intensity resulting from the proposed action.   | F-3.3<br>Sec. 6.7   |
| 4. | Given that the subject property is currently protected by the Town’s most stringent zoning, (based on a site-specific scientific water quality needs assessment – Hughes and Porter, 1983) and given our current understanding of water quality impairment challenges in Weesuck Creek and nearby Shinnecock Bay, it is essential that the Town Board sustain the water protection goals of low density zoning in any development proposal advanced on the subject or nearby properties. The subject proposal does not meet these criteria.  | F-3.4<br>Sec. 2.2.1 |
| 5. | <p>During the DEIS review process, Group for the East End provided the Town Board with a professionally developed design alternative that was consistent with the goals of the adopted Scoping Outline and the resort style development objectives of the project sponsor.</p> <p>This submission (attached to this letter) demonstrated that an alternative development design could provide numerous and substantial environmental benefits over the proposed plan and would be far better keeping with the longstanding goals and objectives of the town’s present water quality protection zoning for the site.</p> <p>We note here, as we did in our public testimony, that the NYS Department of Environmental Conservation (in its SEQRA Handbook) directs reviewers to focus on specific and reasonable development design alternatives that can reduce potential development impacts, and that is exactly what we provided. As a result, we cannot support a development design that fails to provide for the most stringent protection of the subject properties valuable environmental resources when reasonable alternatives have been demonstrated.</p> | F-3.5<br>Sec. 5.7.1 |
| 6. | Based on the review of the project’s primary water quality mitigation measure (“fertigation”), conducted by the hydrogeologic consulting firm of Leggette, Brashears and Graham, we find that this mitigation proposal is largely experimental, not fully developed, and raises substantial questions about how effectively the measure would work over time. This is a critically important issue in terms of the proposed action’s overall nutrient budget and the mitigation measure’s ability to achieve its desired nutrient  | F-3.6<br>Sec. 2.2.3 |



reduction goals over time. We cannot support a project where the major active mitigation measure is experimental.



7. The proposed action represents the largest single development proposal seen in the Town in a generation and it has been proposed under a piece of zoning legislation (the Planned Development District) that the Town Board has largely agreed needs a major overhaul if not an outright repeal. We cannot support the approval of such a major development approval under the terms of a law that has largely proven it to be a failure in terms of long-range community planning. It would be the height of irony to approve The Hills PDD at the same time the Town Board is considering a PDD overhaul or outright repeal.

F-3.7  
Sec. 3.2.2

We greatly appreciate the Town Board's attention to the comments we have raised before you during the public hearing process, and hope that you will consider the contents of this letter alongside that testimony in reaching your final decision on this application.

Given the extensive time already invested in this project assessment, we reiterate our view that the file contains all the information that the Board needs to reject this application.

Thank you for your time and attention to our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. DeLuca', is written above the printed name.

Robert S. DeLuca  
President

Attachments

# Reduced Impact Alternative

for

The Hills at East Quogue Planned Development District

December 2016



Protecting the nature of the place you love

[GroupfortheEastEnd.org](http://GroupfortheEastEnd.org)



Conceptual Reduced Impact Alternative for The Hills at Southampton PDD  
 Southampton, NY

Scale: 1" = 400' Date: 11/4/16  
 0 200 400 Feet  
 0 0.2 0.4 Miles

Legend:  
 Public Open Space

Prepared by:  
 DODSON FLUNKER  
 Landscape Architecture and Planning

GROUP  
 FOR THE EAST END



**Conceptual Reduced Impact Alternative for The Hills at Southampton PDD**  
 Southampton, NY

Scale: 1" = 200'  
 Date: 12/1/16

Prepared by:  
**DODSON & FLINKER**  
 Landscape Architecture and Planning



Comparison of Impacts: Discover Land Company PDD vs. Conceptual Reduced Impact Alternative

Impacts	Discovery PDD		Reduced Impact Alternative		Comparison: Reduced Impact Alternative vs. Discovery PDD
	Acres	% of Site	Acres	% of Site	
Site Development Total Area	166.86	28.23	23.53	4	86% less developed area
Cleared Areas	166.86	28.23	45	7.61	74% less clearing
Fertilized Turf	88.53	15%	0	0	100% less fertilized turf
Preserved Contiguous Open Space	276	48%	546	92	100% more preserved contiguous open space
Preserved Open Space incl. fragmented areas	424	72%	546	92	29% more open space incl. fragmented areas
Water Usage-	53,810,179	gallons per year	11,961,650	gallons per year	78% less water usage
Sewage Flow - bldgs. only	41,814	gallons per day	31,770	gallons per day	25% less sewage flow from buildings
Design flow including turf	65,214	gallons per day	31,770	gallons per day	51% less overall wastewater flow
Nitrogen loading					
Turf	655.1	pounds/year	0	pounds/year	100% less nitrogen loading from turf
Sewage from buildings	Variable by computation model				72 % to 88% less nitrogen loading buildings
Residences total number	118	residences	88	residences	25% fewer residences
Total size of residences	435,800	square ft.	532,800	square ft.	22% greater combined sf of residences
Traffic wkdy PM/Sat peak	103/125	trips per hour	23/31.5	trips per hour	78% to 75% less peak hour traffic



Protecting the nature of the place you love  
[GroupfortheEastEnd.org](http://GroupfortheEastEnd.org)



Battle Road Farm, Lincoln, MA



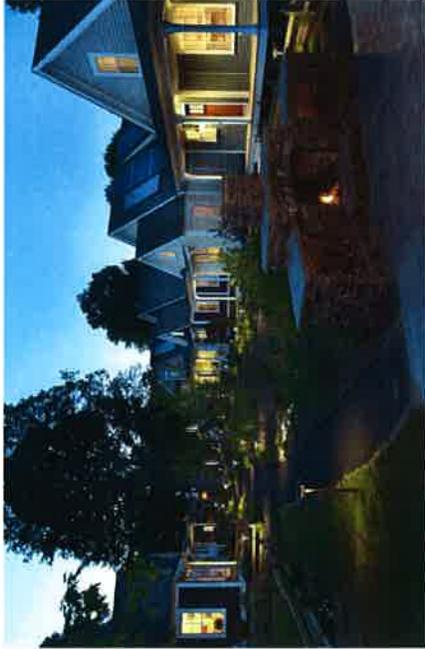
Kentlands, Gaithersburg, MD



Warwick Grove, Warwick, NY



Waterville Valley Resort, Waterville Valley, NH



Concord Riverwalk, Concord, MA



East Beach, Norfolk, VA



Jackson Meadow, Marine St Croix, MN



Jackson Meadow, Marine St Croix, MN



Jackson Meadow, Marine St Croix, MN

Conceptual Reduced Impact Alternative for The Hills at Southampton PDD: Comparables  
Southampton, NY