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## APPENDIX D WRITTEN COMMENTS RECEIVED

November 14, 2023 through March 1, 2024

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RIVERHEAD SEWER DISTRICT  
Town of Riverhead  
200 Howell Avenue, Riverhead, New York 11901  
(631) 727-3069

June 28, 2022

Mr. Thomas F. Lembo, P.E.  
N&P Engineering, Architecture and Land Surveying, PLLC  
70 Maxess Road  
Melville, NY 11747

Re: Town of Southampton – Proposed Riverside Sewer District  
N+P No. 15128

Dear Mr. Lembo,

I have received your letter requesting a meeting to discuss the proposed Riverside Sewer District. After meeting with my Town Board liaison, a meeting will not be necessary. The Riverhead Sewer District does not have sufficient capacity to accept the flow from your project. The Riverhead Sewer District code prohibits the acceptance of sewer sludge from other treatment plants. The district is in the process of upgrading its solids treatment system to process its sludge to Class A Biosolids. The upgrade is designed only to treat the sludge generated at the Riverhead Sewer Treatment Plant.

Should you have any questions or require any further information, please feel free to contact me at (631) 727-3069.

Sincerely,

Michael Reichel, Superintendent  
Riverhead Sewer District

RSD-1  
Sec. 2.3

March 25, 2022

Michael Reichel  
Sewer District Superintendent  
Town of Riverhead  
200 Howell Ave  
Riverhead, NY 11901

**Re: Town of Southampton - Proposed Riverside Sewer District  
N+P No. 15128**

Dear Mr. Reichel:

On behalf of the Town of Southampton, our client, we offer the following for your consideration. The Town of Southampton is proposing the formation of a sewer district to serve the hamlet of Riverside. Nelson + Pope (N+P) has been retained to prepare an analysis to several options for sanitary waste management. We have prepared District formation documents to support an application to the New York State Environmental Facilities Corporation for financing of the district.

As part of the NYSEFC review, they have requested we explore options to consolidate treatment. Riverhead Sewer District was identified as an option for consolidation. Specifically, NYSEFC requested that we open dialogue to discuss conveyance of raw sewage to the Riverhead Sewer District, or in lieu of treating all the sanitary waste generated by the proposed district, the conveyance and treatment of solids produced by the proposed district.

The proposed district will generate approximately 400,000 gallons per day (ADF) in accordance with SCDHS flow rates. The flow is projected to be phased in over a five-year period. Also, preliminary calculations estimate the proposed district will produce approximately 1,800 pounds per day of sludge if capacity to treat raw sewage at the facility cannot be considered.

We respectfully request a meeting to discuss if either of those options can be considered.

- If there is sufficient capacity in the Riverhead STP for the proposed design flow.
- If expansion of the entire Riverhead STP (either as a contractee to the district or via Riverhead Sewer District expansion) is an available option.
- If there is sufficient capacity in the solids handling portion of the existing Riverhead STP to accept solids from a proposed Riverside STP
- If expansion of the solids handling portion of the existing Riverhead STP is an available option to accept solids from a proposed Riverside STP



May 17, 2023

Sundy A. Schermeyer  
Town Clerk  
Southampton Town  
116 Hampton Road  
Southampton, NY 11968

**RE:** SEQRA Lead Agency Coordination  
Supplemental Generic Environmental Impact Statement (SGEIS)  
Riverside Sewer District  
Riverside Community Sewage Treatment Plant  
Central Pine Barrens Compatible Growth Area

Robert Calarco  
*Chairman*

Yvette Aguiar  
*Member*

Steven Bellone  
*Member*

Edward P. Romaine  
*Member*

Jay H. Schneiderman  
*Member*

Dear Ms. Schermeyer:

On April 28, 2023, the Central Pine Barrens Commission received the SEQRA Lead Agency Coordination for the subject proposal. The proposed facility will be constructed in the Central Pine Barrens Compatible Growth Area.

The Commission does not object to Southampton Town Board assuming Lead Agency for the proposed action.

PBC1-1  
Sec.  
2.11

### **Existing Conditions and the Proposed Project**

The referral material contains a map titled “Phase I and Phase II Overall Site Plan” dated April 3, 2017, prepared by Nelson and Pope, that identifies a proposed STP location in the Southampton Enterprise Zone industrial subdivision. Force mains and pumping stations are also identified in the map. The tax map numbers listed in the map may be incorrect on the STP location. The map lists lots 900-141-1-9.6 and 9.7. The lots may be 900-141-1-9.25 and 9.31.

According to the referral, the Town Board has determined that a Supplemental Generic Environmental Impact Statement (SGEIS) is needed for the project to implement the zoning and realize the development plan for Riverside. The proposal is to develop a sewage treatment plant with a maximum flow of 800,000 gallons per day. The project consists of the construction of a sewage treatment plant, leaching area, pump stations, force main and related facilities. The STP will serve the Riverside hamlet defined in the Town’s Riverside Hamlet Plan.

624 Old Riverhead Road  
Westhampton Beach, NY  
11978

Phone (631) 288-1079  
Fax (631) 288-1367  
<https://pb.state.ny.us/>

The Riverside sewer district is approximately 468 acres. The EAF Part I lists the total area of physical disturbance as 30.77 acres with 12.7 acres owned by the project sponsor. Two pump stations will be developed on two additional lots owned by the town including one that is 7.1 acres and one that is 4.5 acres, and construction will occur in right of ways.

## Central Pine Barrens Status

The proposal must conform with the standards of the Comprehensive Land Use Plan. Please ensure conformance prior to implementation, pursuant to New York State Environmental Conservation Law Article 57 §57-0123(3)(a), which states:

...”no application for development within the Central Pine Barrens area shall be approved by any municipality or county or agency thereof or the commission, and no state approval, certificate, license, consent, permit, or financial assistance for the construction of any structure or the disturbance of any land within such area shall be granted, unless such approval or grant conforms to the provisions of such land use plan;”...

PBC1-2  
Sec.  
2.4

The proposal must conform to all other involved agency jurisdictions and permit requirements in effect on the project site. Thank you for your attention, and if you have any questions, please do not hesitate to contact me at (631) 218-1192.

PBC1-3  
Sec.  
2.10

Sincerely,



Julie Hargrave  
Policy and Planning Manager

cc: Judy Jakobsen, Executive Director  
John C. Milazzo, Counsel



TOWN OF RIVERHEAD  
Community Development Department  
200 HOWELL AVENUE, RIVERHEAD, NEW YORK 11901  
(631) 727-3200 Fax (631) 727-5772 TDD (631) 727-4500

Dawn C. Thomas, Esq., Director Ext. 287  
Joseph Maiorana, Asst. Community Development Project Supervisor Ext. 236  
Frank Messina, Grants Technician Ext. 238  
Carissa Collins, Assistant Administrator

May 18, 2023  
Sundy A. Schermeyer, Town Clerk  
Town of Southampton  
116 Hampton Road  
Riverhead, NY 11901

Dear Town Clerk Schermeyer:

We are in receipt of your April 27, 2023 letter attaching a copy of Southampton Town Board resolution #630-2023 titled: "Coordinate Lead Agency for Supplement Generic Environmental Impact Statement (SGEIS) for the siting and construction of a Community Sewage Treatment Plan (STP) in the Hamlet of Riverside."

Attached hereto kindly find the executed form portion of the correspondence sent which acknowledges receipt of the above-mentioned resolution.

As an interested party in the Town's SEQR process for this project, we are hereby officially requesting that copies of all notices, resolutions, project and meeting information be forwarded to the Town Supervisor, Yvette Aguiar at [Supervisor@townofriverheadny.gov](mailto:Supervisor@townofriverheadny.gov) with a copy to myself at [thomas@townofriverheadny.gov](mailto:thomas@townofriverheadny.gov) and to our Town Attorney Erik Howard at [Howard@townofriverheadny.gov](mailto:Howard@townofriverheadny.gov).

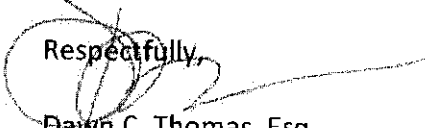
RCDD-1  
Sec. 2.11

We look forward to seeing Southampton's progress in establishing an STP in this ecologically sensitive area, but also have serious concerns relating to the potential for dense residential and commercial development within the Riverhead Central School District and adjacent to Riverhead's downtown area, which we are working hard to revitalize. As such, we are keenly interested in participating in the SEQRA process for this project.

RCDD-2  
Sec. 2.11

Please feel free to contact me with any questions or if you need any additional information.

Respectfully,

  
Dawn C. Thomas, Esq.  
Community Development Director

The Town of Riverhead is an equal opportunity provider and employer. Discrimination is prohibited by Federal Law. Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotope, etc.) should contact our office at one of the numbers listed above.

# RIVERHEAD CENTRAL SCHOOL DISTRICT

814 Harrison Avenue  
Riverhead, NY 11901  
FAX (631) 369-6718 · [www.riverhead.net](http://www.riverhead.net)

Dr. Augustine E. Tornatore  
Superintendent of Schools  
(631) 369-6717



RECEIVED  
MAY 25 P 1: Dr. Lori Koerner  
Assistant Superintendent for Human Resources &  
Elementary Education  
(631) 591-5921

Dr. Rodney Asse  
Assistant Superintendent for Business  
(631) 369-6711

Dr. William Galati  
Executive Director for Secondary Education,  
Grants & Student Outcomes  
(631) 369-6714

May 22, 2023

Honorable Sundy A. Schermeyer  
Town Clerk  
Town of Southampton  
116 Hampton Road  
Southampton, NY 11968

Dear Ms. Schermeyer:

RCSD-1  
Sec. 2.2

We are in receipt of your April 27, 2023 letter attaching a copy of Southampton Town Board resolution #630-2023 titled: "Coordinate Lead Agency for Supplement Generic Environmental Impact Statement (SGEIS) for the siting and construction of a Community Sewage Treatment Plan (STP) in the Hamlet of Riverside."

As an interested party in the Town's SEQR process for this project, we are hereby officially requesting that copies of all notices, resolutions, project and meeting information be forwarded to the Town Supervisor Yvette Aguiar at [Supervisor@townofriverheadny.gov](mailto:Supervisor@townofriverheadny.gov) with a copy to myself at [augustine.tornatore@riverhead.net](mailto:augustine.tornatore@riverhead.net) and to our attorney Ashley Pope at [apope@guerciolaw.com](mailto:apope@guerciolaw.com).

We look forward to seeing Southampton's progress in establishing a STP in this ecologically sensitive area, but also have serious concerns relating to the potential for dense residential and commercial development within the Riverhead Central School District and adjacent to Riverhead's downtown area, which we are working hard to revitalize. As such, we are keenly interested in participating in the SEQRA process for this project.

Please feel free to contact me with any questions or if you need any additional information.

RCSD-2  
Sec. 2.11

Respectfully,

Dr. Augustine E. Tornatore  
Superintendent of Schools



Jeffrey W. Szabo  
Chief Executive Officer

Administrative Offices: 4060 Sunrise Highway, Oakdale, New York 11769-0901  
(631) 563-0353  
Fax: (631) 563-0370

RECEIVED  
2023 MAY 25 P 1:50  
TOWN CLERK'S OFFICE

May 22, 2023

Sundy Schermeyer  
Town Clerk  
Town of Southampton  
116 Hampton Road  
Southampton, NY 11968

Re: Riverside Sewer District - Town of Southampton  
SEQRA Coordination for Supplemental GEIS  
SCTM# Various Tax Map Numbers - 468± Acres

Dear Ms. Schermeyer:

Your notification for SEQRA Coordination was received and reviewed by our agency.

Please be advised that our agency, the Suffolk County Water Authority (SCWA), has no interest to be designated Lead Agency status for the project captioned above.

SCWA would however like to make the following comments as they relate to the proposed STP with leaching system.

Treated effluent from these types of facilities has the potential to include emerging contaminants such as 1,4 Dioxane along with PFOA and PFOS which are all now regulated in New York State to extremely low levels. As you know, 1,4 Dioxane is not readily treated with conventional methods and SCWA has made a significant investment in research to treat wells impacted by this contaminant. We are currently in the process of retrofitting treatment to many of our wells to remove these contaminants at a great cost to our ratepayers. In addition to the currently regulated contaminants, we are concerned that a facility such as this will become a point source for high concentrations of unregulated pharmaceuticals and personal care products (PCPPs). Regulated or unregulated, SCWA believes that these contaminants should be treated at the source, not at the wellhead. Ideally, SCWA would like to see wastewater treatment that would prevent introduction of all these contaminants to our groundwater supply. If this is not possible, then the developer and their engineer should be required to demonstrate that by the time the treated effluent from this facility reaches any public supply well screen, the concentrations of these contaminants are all below the drinking water standard.

SCWA-1  
Sec.  
2.11

SCWA-2  
Sec. 2.6

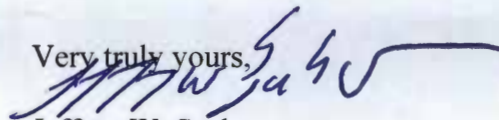
Page Two  
May 22, 2023

Beyond the regulatory aspects of the permitting of this facility, we have concerns about its operation. To keep them functioning properly, a high level of operational and engineering expertise is required that may exceed the capabilities of the plant operators. The result can be the exceedance of discharge parameters and negative impacts to groundwater resources. We feel strongly that such potential negative impacts must be avoided to the maximum extent possible. This should be done through more rigorous operator certification and training along with stiffer penalties for violations.

SCWA-3  
Sec. 2.6

If your agency and/or consultant have any questions or concerns, you would like to discuss about this project please call Joseph Pokorny, Deputy CEO of Operations at 631-563-0202.

Very truly yours,



Jeffrey W. Szabo

Cc: Charles Lefkowitz, Chairman, SCWA  
Joseph Pokorny, Deputy CEO Operations, SCWA



**Department of  
Transportation**

**KATHY HOCHUL**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**RICHARD B. CAUSIN, P.E.**  
Regional Director

RECEIVED

2023 DEC -6 P 3:27

TOWN CLERK'S OFFICE  
TOWN OF SOUTHAMPTON

December 1, 2023

Southampton Town Board  
116 Hampton Road  
Southampton, NY 11968

Attn: Ms. Sundy A. Schermeyer, Town Clerk

RE: Town Board Resolution RES-2023-1339  
SDGEIS for Construction of Community Sewage Treatment Plant  
Hamlet of Riverside, Town of Southampton

Dear Ms. Schermeyer:

The Office of Right-of-Way, New York State Department of Transportation, is in receipt of Town Resolution RES-2023-1339 and SDGEIS for the construction of a sewage treatment plant and in Riverside Sewer District.

On the recently submitted SDGEIS, Page 1-28 states that the installation on State right-of-way would be done as an easement on a State Drainage Basin. The pump Station and sewer force main in State right-of-way would not be installed under an easement but requires a Highway Work Permit, then details of which still need to be addressed. Please correct this in the final GEIS.

DOT-1  
Sec. 2.10

If you have any questions, please contact Sharon Muchnick, Regional Property Manager, at (631)952-3362 or by email at [Sharon.Muchnick@dot.ny.gov](mailto:Sharon.Muchnick@dot.ny.gov). To obtain a Highway Work Permit, please contact Olumuyiwa Fajolu of Traffic & Safety at (631) 962-0427 or by email at [Olumuyiwa.Fajolu@dot.ny.gov](mailto:Olumuyiwa.Fajolu@dot.ny.gov).

Yours Truly,

MICHAEL S. LIBRIZZI  
Regional Real Estate Officer

Cc: Olumuyiwa Fajolu, Traffic & Safety  
Sharon Muchnick, Office of Right-of-Way

**RIVERHEAD CENTRAL SCHOOL DISTRICT  
BOARD OF EDUCATION**

814 Harrison Avenue  
Riverhead, NY 11901  
[www.riverhead.net](http://www.riverhead.net)

Colin J. Palmer  
President, Board of Education



Cheryl Pedisich  
Interim Superintendent of Schools  
(631) 369-6717

Gregory S. Wallace  
RCEA Union President

December 11, 2023

**VIA Hand Delivery &  
VIA Email to: [townclerk@southamptontownny.gov](mailto:townclerk@southamptontownny.gov)**

Town of Southampton, Town Council  
116 NY-27A  
Southampton, NY 11968

RECEIVED  
2023 DEC 11 A 10: 09  
TOWN CLERK'S OFFICE  
TOWN OF SOUTHAMPTON

Dear Town Council Members,

RCSD1-1  
Sec. 2.9

Public school districts are charged with the education of those children residing in the communities they serve. For the Riverhead Central School District, it is the primary directive that guides all of our operations, initiatives, academic programming and services. We arrive at our jobs every day with a single purpose - to educate every child in the district's catchment area with a high-quality education that inspires and academically empowers our students to become successful, contributing citizens in our local community as well as in a global society.

To be successful in providing an environment that supports the quality education the children of the Riverhead community deserve, it is critical that each of our school buildings have sufficient capacity to provide for the necessary classrooms and support programming space required by its enrollment. Currently, our school buildings are at or very near capacity. Our need to accommodate expanding academic and support programming, such as computer labs, makerspace rooms, dedicated STEM labs, and additional music and fine arts continue to place greater challenges on the district. It is not an exaggeration to say that the district is at a tipping point when it comes to its space capacity. In 2018 and in 2020, the district attempted to address this significant districtwide space issue through bond referendums. Both were rejected by the community. While we have been creative and innovative in our use of current building space, it is clear that our district cannot absorb a significant increase in students without a commensurate increase in classroom and support programming capacity.

We appreciate the agenda and objectives of the Riverside Revitalization Action Plan being considered by the Town of Southampton Town Board. A plan that takes into consideration and provides for the impact of its full implementation is a plan we can support. However, the plan, as currently proposed, makes no accommodation, nor does it address the serious consequences it will have on the Riverhead Central School District.

Based on our understanding of the overall plan as described in the September 15, 2021 Town of Southampton Downtown Revitalization Initiative Round V (dri5) document, the proposed development includes:

- Over 2,300 new housing units, half of which will be designated affordable housing
- A projection of almost 4,000 new residents

All new housing units and the projected increase in population are all in the catchment area of a single Riverhead Central School District elementary school – the Phillips Avenue Elementary School.

With 4,000 new residents anticipated by this project, of which a good portion will be families taking advantage of the workforce housing opportunity it represents, it is reasonable to assume that several hundred, if not more, will be school age children. It is of note that nowhere in the dri5 document does it project the number of school age children that will be generated by the plan.

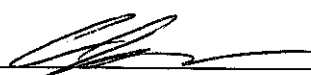
With hundreds, if not more, students entering the Riverhead Central School District, there must be included in this plan funding for the expansion of the Phillips Avenue Elementary School or the construction of a new Riverhead Central School District elementary school that will be dedicated to students from this new community. Additionally, with this many students progressing from the elementary level to our upper grades, there must be additional funding allocated for the expansion of the district's middle school and high school. It is clear, from the outcome of both the 2020 and 2018 bond referendums, the greater Riverhead community is not prepared to take on an additional financial burden. The reality of hundreds of new students being enrolled in the district without the critically needed additional building capacity will severely impact our ability to deliver a quality education to our students. It will result in Phillips Avenue facing a crisis of over-enrollment, class sizes increasing at the upper grade levels, many important programs like music and art being relegated to carts and other programs being eliminated.


The increase in enrollment will also require additional teaching and support staff. This will add significantly to the district's annual operating budget. It is essential that tax revenue generated by this redevelopment initiative account for the increased costs to the district.


It is the nuances of our township boundaries that has placed control over the approval process for the proposed Riverside Revitalization Action Plan outside the province of the township and school district this plan will primarily impact. We respectfully request that the Town of Southampton Town Board consider our concerns and take the necessary steps to ensure any approvals given to the final plan include assurances that the developers accommodate the increased educational space needs of our District through new school construction or financial provisions to the school district. Without such assurances, we respectfully submit that we cannot support the Riverside Revitalization Action Plan as proposed in the dri5 document.

Sincerely,

RCSD1-1  
cont.  
Sec. 2.9

  
Colin J. Palmer  
RCSD Board of Education, President

  
Cheryl Pedisich  
Interim Superintendent of Schools

  
Gregory S. Wallace  
RCFA Union President

T.B. Meeting 12/12/23  
P.H. # 5

26

Jeffrey L. Seeman  
Certified Environmental Professional  
PO Box 130  
East Quogue, NY 11942  
631.872.9116  
Jeffrey.seeman@icloud.com

RECEIVED  
DEC 12 2023  
Town Clerk

December 12, 2023

Town of Southampton Department of Land Management  
116 Hampton Road  
Southampton, NY 11968  
Janice Sherer, Town Planning and Development Administrator

RE: SEQRA Public Comment: Supplemental Draft GEIS Riverside Sewer District

Dear Ms. Sherer,

As environmental consultant to the Town of Riverhead, I am retained by the Town Board who are the Commissioners of the Riverhead Sewer District, to assist Dawn Thomas, Esq., Economic Development & Planning Administrator with the SEQRA review and preparation of comments on the above referenced SDGEIS.

The Town of Riverhead Board supports the common and mutually beneficial goals of the revitalization efforts along both sides of the Peconic River. The environmental and socio-economic benefits to the communities of Riverhead and Southampton are well recognized. JS-1 Sec. 2.1

The proposed Riverside Sewer District and its collection and treatment infrastructure are critical for Southampton to continue its redevelopment efforts to revitalize Riverside. The Town Board of Riverhead supports these efforts and wants to acknowledge that had the Southampton Town Board, as Lead Agency, elected to exercise its option under SEQRA to have formally Scoped the Supplemental DGEIS the following issues and comments could have been addressed earlier in the SEQRA process. The Riverhead Sewer District Commissioners wish not to impede the development of the proposed Riverside Sewer District and support the program to improve water quality and long-term protection of the Peconic Estuary. JS-2 Sec. 2.2 JS-3 Sec. 2.11

1. The Southampton Flanders/Northampton/Riverside Revitalization Study (Ferrandino & Associates, et al) adopted in March 2004 identified Riverside as inclusive of the County Government Center, and as one of the area's revitalization objectives, recommended Southampton, "Coordinate development with neighboring Riverhead." JS-4 Sec. 2.2
2. As early as July 2013, Suffolk County and Southampton Town representatives, confirmed to the attendees at a FRANCA public meeting, that any potential or proposal for a Riverside sewer collection system to convey its wastewater via a connection to the Riverhead Sewer District was not possible. JS-5 Sec. 2.3
3. The DSGEIS Riverside Sewer District (November 2023) identified as Alternative 4: "An assessment of an alternative where a shared services agreement is executed by the Town of Southampton and Town of Riverhead to allow the Riverside community to connect to Riverhead STP for treatment and disposal of all Riverside wastes." In response to the proposed SDGEIS Alternative, a letter from the Riverhead Sewer District again confirmed



- |  |  |
|--|--|
| <p>the District has no capacity at the treatment plant to accept the projected wastewater flow from Riverside and furthermore, is restricted from accepting sewage sludge from outside the District.</p>   | <p>↑ JS-5<br/>cont.<br/>Sec.<br/>2.3</p> |
| <p>4. As part of its standard review procedure, New York State Environmental Facilities Corporation requested information regarding the potential for local and/or shared sanitary infrastructure for its evaluation of the proposed Riverside Sewer District. However, as the Riverhead facilities have already been ruled out, the Riverhead Town Board was concerned why Alternative 4 was included in the SDGEIS.</p>  |  |
| <p>5. With respect to the proposed Riverside Sewer District, the nearest existing sanitary sewer system is at the Suffolk County Government Center and County Correctional facilities, each of which are in the geographic boundaries of Riverside. These existing Riverside facilities should be identified and fully described in the SDGEIS. Once established, the proposed Riverside Sewer District will be the nearest location where the County facilities can connect its current sanitary infrastructure.</p>  | <p>JS-6<br/>Sec.<br/>2.2</p>             |
| <p>6. The Suffolk County Center and Correctional Facility have been utilizing the Riverhead Sewer District facilities as a temporary sanitary disposal means, until an alternative disposal method can be realized. The County's existing connection to the Riverhead Sewer District is through the sanitary pump station located at the Nugent Drive bridge, approximately 1000 linear feet from the proposed Riverside Sewer District boundary.</p>  | <p>JS-7<br/>Sec.<br/>2.2</p>             |
| <p>7. The SDGEIS must assess including the County facilities as part of the proposed Riverside Sewer District or as a potential connection from outside the proposed district's boundary because of its proximity to the proposed Riverside Sewer District infrastructure.</p>   | <p>JS-8<br/>Sec.<br/>2.2</p>             |
| <p>8. Considering the proposed Riverside Sewer District consists of more than 12 miles of collection pipes, four (4) pump stations and a treatment plant designed for processing 800,000 GPD, adding the Suffolk County Center and County Correctional Facility is not unreasonable. The Suffolk County Department of Health Services sanitary design flow standards showed the Suffolk County Correctional Facility at (+/-) 122,000 GPD and the County Center and Courts at (+/-) 47,000 GPD for a total of (+/-) 169,000 GPD. The meter reading recorded by Riverhead shows closer to an average of 100,000 GPD as the total flow from these County facilities.</p> | <p>JS-9<br/>Sec.<br/>2.2</p>             |
| <p>9. The SDGEIS must develop a timeframe for the County facility's connection(s) in Phase 1 to relieve the Riverhead Sewer District from the current temporary arrangement of accepting wastewater from outside its sewer district boundary.</p>  | <p>JS-10<br/>Sec.2.2</p>                 |
| <p>10. This approach will provide the Riverhead Sewer District much needed capacity at the Riverhead treatment plant and serve to "kick start" the proposed Riverside Sewer District and its treatment plant.</p>  | <p>JS-11<br/>Sec.2.2</p>                 |
| <p>11. Inclusion of the County Center wastewater will provide the Southampton/Riverside Sewer District with a revenue stream from the sewer fees.</p>  | <p>JS-12<br/>Sec.2.2</p>                 |
| <p>12. Riverhead is in the process of updating the Town's Comprehensive Plan. A critical component of the Plan is continuation of farmland preservation through a proposed transfer of development rights from agricultural land (currently zoned for residential use) to receiving areas where higher density can be accommodated by Riverhead's municipal sewer and water supply systems. A limiting factor is the existing capacity of the Riverhead treatment plant to support anticipated increased density of the receiving areas, thus placing added pressure on the Town's farmland preservation efforts.</p>  | <p>JS-13<br/>Sec.<br/>2.2</p>            |
| <p>13. The Town of Riverhead Town Board, as Commissioners of the Riverhead Sewer District will cooperate with the Lead Agency to provide support for the Riverside Sewer District</p>  | <p>JS-14<br/>Sec.<br/>2.2<br/>↓</p>      |

and offer additional information regarding the County Center's existing sanitary disposal infrastructure.

14. As the Riverhead Town Board will be required to approve the potential transfer of the County facility wastewater disposal system and existing infrastructure from the Riverhead Sewer District to the proposed Riverside Sewer District, the Commissioners of the Riverhead Sewer District should be listed as a SEQRA Involved Agency, not Interested Party.
15. Lastly, since the Lead Agency elected not to Scope the DSGEIS, the substantive comments listed above will only be addressed in the Final Supplemental GEIS. As SEQRA provides no comment period on the Final SGEIS, the Riverhead Town Board request a preliminary review of the responses, and further recommends an open dialogue be established prior to completing the Final SGEIS whereby the Riverhead Town Board's comments shall be adequately addressed.


↑ JS-14  
cont.  
Sec.2.2

JS-15  
Sec.  
2.1

JS-16  
Sec.  
2.1

On behalf of the Town of Riverhead Town Board, thank you for accepting these initial comments to the SDGEIS. The Town of Riverhead will continue to cooperate with our respective revitalization efforts and offer additional comments to the SDGEIS as may be appropriate.

Very truly yours,

  
Jeffrey L. Seeman, CEP  
Certified Environmental Professional

Sundy A. Schermeyer, Town Clerk  
Town of Southampton  
116 Hampton Road  
Southampton, NY 11968

TB Meeting 12/12/23  
P.H. #5

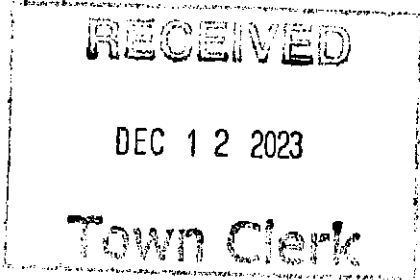


TOWN OF RIVERHEAD  
Department of Economic Development, Planning and Building  
4 West Second Street, RIVERHEAD, NEW YORK 11901  
(631) 727-3200, Ext. 287 TDD (631) 727-4500

Dawn C. Thomas, Esq., Administrator

December 12, 2023

Sundy A. Schermeyer  
Town Clerk  
Town of Southampton  
116 Hampton Road  
Southampton, NY 11968



Dear Town Clerk Schermeyer:

Thank you for the opportunity to comment on Southampton's Supplemental DGEIS for the siting and construction of a Riverside Community Sewage Treatment Plan (STP). My name is Dawn Thomas. I am the Administrator of the Town of Riverhead's Department of Economic Development, Planning and Building. I make these comments at the request of the Riverhead Town Board and as such, they serve as the Town of Riverhead's official comments to Southampton's Supplemental DGEIS for the Riverside Community Sewage Treatment Plant.

RDED-1  
Sec. 2.5  
Southampton's efforts to create a sewage treatment plant for Riverside to protect the Peconic Estuary are to be lauded. Protection of the Peconic Estuary is critical and this STP will allow for much needed and long-awaited new development. Riverhead created its downtown sewer system in the early part of the 20<sup>th</sup> century and it has been essential to the protection of the river and bay values as well as to the redevelopment and revitalization of Downtown Riverhead. Riverhead hopes and anticipates that the addition of a Riverside Sewage Treatment plant will provide long awaited revitalization in the Riverside hamlet. (FGEIS Riverside BOA, Revitalization Plan and Zoning Amendments section 2.1)

RDED-3  
Sec.2.1  
As you know, over 10 years ago, Southampton Town launched a comprehensive effort to bring revitalization to Riverside known as the Riverside Revitalization Action Plan (RRAP). This plan resulted in the adoption of an overlay zoning district which calls for the creation of a significant number of residential units, the majority of which are proposed to be rental units. The implementation of that plan, which contains many excellent recommendations, was wholly dependent upon the creation of a means through which to manage the septic flow for that proposed density. Now that Southampton is making progress on its plan to create an STP, the likelihood of development in Riverside is greater and the impacts created by the planned density could soon be realized. Per the FGEIS for the Riverside BOA and RRAP plan amendments, up to 3.2M square feet of development, including 2300 residential units and could potentially occur within a very small geographical area. The lion's share of that density would be focused on the northern part of the Riverside

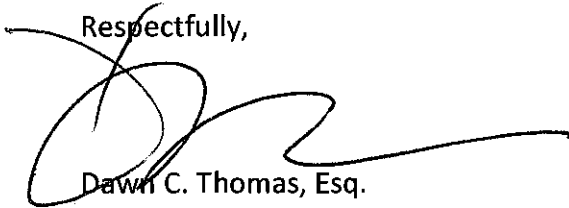
- RDED-3  
cont.  
Sec.2.1
- ↑ traffic circle – the area closest to Downtown Riverhead and located within the Riverhead Central School District.
- RDED-4  
Sec. 2.7
- Although Riverside and Downtown Riverhead are located in different Towns, they effectively function as one community and one economic ecosystem. Both Riverside and Riverhead are Areas of Persistent Poverty, Environmental Justice Areas and are considered Historically Disadvantaged. Both depend upon necessary infrastructure and services located in Riverhead Town. Both hamlets have struggled to be revitalized for many years. Accordingly, it is critical that Southampton and Riverhead Towns work closely together to ensure the best results in the redevelopment of Riverside as it will have a substantial impact on Riverhead and the infrastructure it provides to Riverside. As noted in preamble to the RRAP, many people – even those living in Riverside - are unaware that Riverside is not part of Riverhead Town.
- RDED-5  
Sec.2.7
- Over the last 10 years since the Riverside Overlay District was developed and adopted by the Southampton Town Board, many of the underlying assumptions and data contained in the Riverside Revitalization Action Plan (RRAP) have changed dramatically. In particular, the marked reduction of opportunities for home ownership and the consequential building of wealth, the increase in population due to COVID and migration and the increased need for workforce. In addition, Riverhead Town has supported and been successful in increasing residential development as part of the process of revitalization.
- RDED-6  
Sec.2.7
- These new developments in demographics are clearly illustrated in the 2020 US Census as well as in the mapping tool created by ERASE Racism (See below). As you will see when you use this tool, Riverside is already identified as “extremely high” in “people of color segregation”. Downtown Riverhead is identified as “moderately high” in the same category. These conditions require that whatever is built in Riverside facilitate the growth of diversity in economics, race and/or ethnicity. Failing to acknowledge and account for these facts could result in inadvertent exacerbation of the already “extremely high” segregation that exists in this area. The ERASE Racism Mapping tool also shows that the Riverhead Central School District is within the lowest category of the Educational Opportunity Index. The district must be considered in any development plans that could significantly impact it as it is already stretched to its limits.
- RDED-7  
Sec. 2.7
- Accordingly, Riverhead Town is hereby officially requesting to work with Southampton Town to review and possibly revise the plans in the RRAP and in the Riverside Overlay Zoning District to evaluate saturation and to ensure that the environmental, socio economic and economic impacts to the Riverside, to Downtown Riverhead community serve the residents of this community well. This work will also ensure that Southampton’s plans for its Sewage Treatment plan are right sized for the development that is appropriate for the area and that unnecessary expenditures are avoided.

Sundy A. Schermeyer, Town Clerk  
December 12, 2023

Page 3

Thank you for taking the time to receive Riverhead Town's comments to your Sewage Treatment Plan's DGEIS.

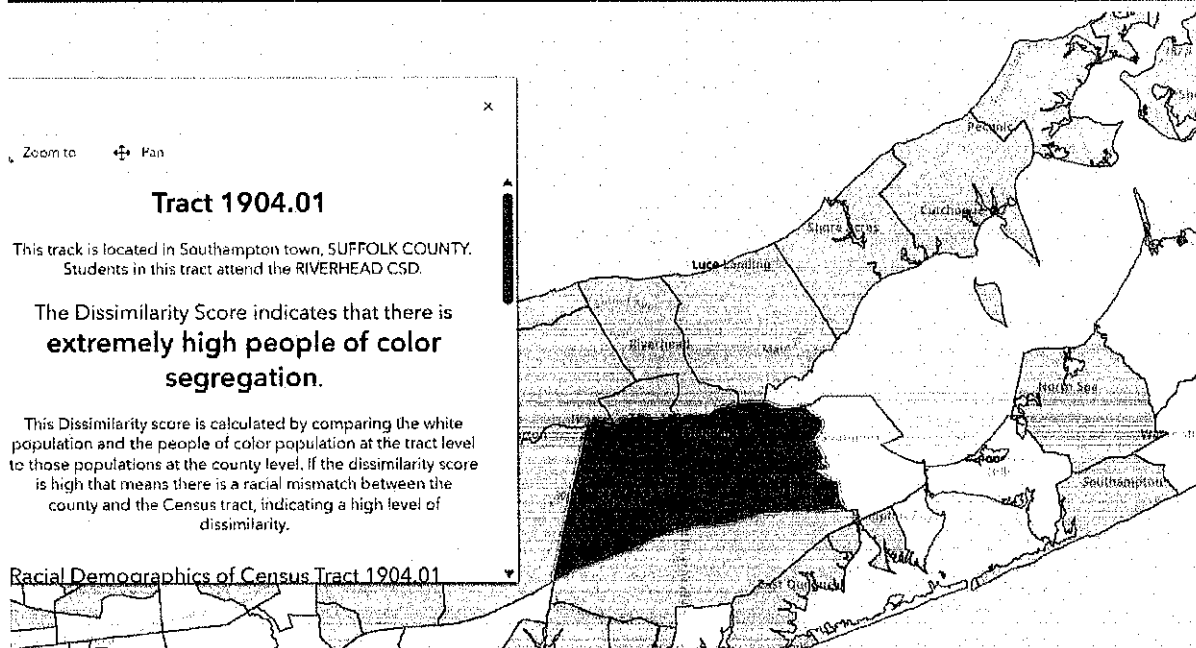
Respectfully,

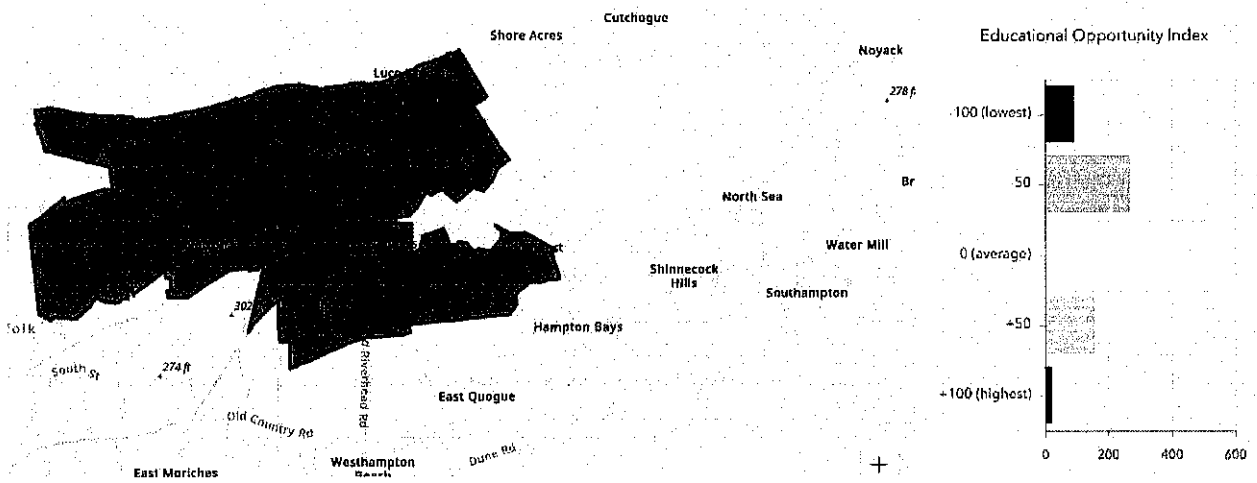


Dawn C. Thomas, Esq.

cc: Alicka Ampry-Samuel, Regional Administrator  
Office of the Regional Administrator, US Dept. of Housing and Urban Development  
Kevin Law, Chairman, NYS Empire State Development  
RuthAnne Visnauskas, Commission and CEO of NYS Homes and Community Renewal  
Cara Longworth, Regional Director, NYS Empire State Development  
Sarah Lansdale, Commissioner – Suffolk County Department of Planning and Environment

<b>ERASE Racism's</b> Affordable & Inclusive Housing Tool	Zoom <input type="checkbox"/> NY	County All	Town All	School District All	Neighborhood OPP All
--	----------------------------------	---------------	-------------	------------------------	-------------------------







December 20, 2023

Sundy A. Schermeyer  
Town Clerk  
Southampton Town  
116 Hampton Road  
Southampton, NY 11968

**RE:** SEQRA Involved Agency Coordination  
Supplemental Draft Generic Environmental Impact Statement  
SCTM #s 900-141-1-9.14, 9.17, 9.25, 9.29, 9.30 and 9.32  
Riverside Sewer District  
Riverside Community Sewage Treatment Plant  
Central Pine Barrens Compatible Growth Area

Robert Calarco  
*Chairman*

Yvette Aguiar  
*Member*

Steven Bellone  
*Member*

Edward P. Romaine  
*Member*

Jay H. Schneiderman  
*Member*

Dear Ms. Schermeyer:

On April 28, 2023, the Central Pine Barrens Commission received the SEQRA Involved Agency Coordination for the subject proposal. The referral included the Supplemental Draft Generic Environmental Impact Statement (SDGEIS) for the Riverside Sewer District dated November 2023, prepared by Nelson Pope Voorhis. The project is located in the Central Pine Barrens Compatible Growth Area.

The Town Board resolution # 2023-1339 dated November 14, 2023 classifies the proposal as an Unlisted Action. A public hearing is scheduled for December 12.

**Existing Conditions and the Proposed Project**

The proposed activity is the development of a sewage treatment plant with the capacity of approximately 800,000 gallons per day for the hamlet of Riverside. The project implements the vision for revitalization described and analyzed in the Town’s Generic Environmental Impact Statement (GEIS) for the hamlet of Riverside.

The Town Board resolution identifies that the project site is 10.82 acres. It is identified as tax lots 900-141-1-9.14, 9.17, 9.25, 9.29, 9.30 and 9.32. The lots are located in the commercial/industrial subdivision known as Southampton Enterprise Zone in the CGA, south of New York State Route 24 in the hamlet of Riverside.

On page 5-11 of the SDGEIS it states, “The proposed Action will be reviewed as a Hardship Exemption.”

PBC2-1  
Sec.  
2.4

**Central Pine Barrens Status**

The project constitutes development pursuant to New York State Environmental Conservation Law Article 57 §57-0107(13). As development, it must conform with the Central Pine Barrens Comprehensive Land Use Plan standards implemented by the Town Code. Please direct the applicant to submit a

PBC2-2  
Sec.  
2.4

624 Old Riverhead Road  
Westhampton Beach, NY  
11978

Phone (631) 288-1079  
Fax (631) 288-1367

<https://pb.state.ny.us/>



demonstration of conformance with the Plan. If it cannot conform, it may be revised to conform or the applicant must submit a hardship waiver request, subject to Commission review and decision.

↑  
PBC2-2  
Sec.  
2.4

Additionally, ECL Article 57 §57-0123(3)(a), states:

...“no application for development within the Central Pine Barrens area shall be approved by any municipality or county or agency thereof or the commission, and no state approval, certificate, license, consent, permit, or financial assistance for the construction of any structure or the disturbance of any land within such area shall be granted, unless such approval or grant conforms to the provisions of such land use plan;”...

### Comments

Preliminarily, the staff has reviewed the document and offers comments for your consideration. Please clarify the project site area, the proposed clearing and area to remain natural and mitigation proposed for the project. Please demonstrate conformance with the applicable standards of the Comprehensive Land Use Plan and specify the Plan provisions where waivers from conformance would be required for the Project.

PBC2-3  
Sec.  
2.4  
PBC2-4  
Sec.  
2.4

The Project is one of the specific elements of the hamlet plan. The Project will serve the entire hamlet. Implementation of the hamlet plan is a Development of Regional Significance (DRS). Therefore, a DRS application should be submitted for review by the Commission.

PBC2-5  
Sec.  
2.4

### Guideline 5.3.3.1.5 Nitrate-nitrogen

- The current nitrogen concentration in groundwater in the Study Area is 4.58 mg/l and 4.83 mg/l in the Central Pine Barrens portion of the Study Area.
- The projected nitrogen concentration is 4.38 mg/l in the Study Area and 4.55 mg/l in the Central Pine Barrens portion of the Study Area.
- Although reduced, the projected concentration exceeds the goal of 2.5 mg/l limit identified in this Guideline.
- Please specify if the applicant seeks a waiver from conformance with this Guideline.

PBC2-6  
Sec.  
2.4

### Standard 5.3.3.1.1 Article 6 of the Suffolk County Sanitary Code

- The project site is a Receiving Area for Pine Barrens Credits. Regardless of the development of a Sewage Treatment Plan, if the projected wastewater flow is greater than the “as of right” flow under pre-revitalization plan conditions, the redemption of Pine Barrens Credits is encouraged to support the Plan’s complementary land use and credit program goals and objectives.

PBC2-7  
Sec.  
2.4

- Please demonstrate the Town’s continued conformance with the minimum 1:1 sending to receiving area ratio since the project reduces receiving area capacity.

↑  
PBC2-7  
cont.  
Sec.  
2.4

**Standard 5.3.3.4.1 Nondisturbance Buffers**

A freshwater wetland habitat is present on the south side of the property occupied by Suffolk Federal Credit Union (SCTM # 900-141-1-9.18), adjacent to the project site. Its extent should be mapped for the Project including whether it extends into lot 9.17 to ensure it is protected by buffers.

PBC2-8  
Sec.  
2.4

Please confirm the proposal will adhere to required setbacks and buffers to protect this wetland habitat. Presently, the plans in the document do not appear to identify the wetland habitat or measures and buffers to protect it.

**Standard 5.3.3.6.1 Vegetation Clearance Limits**

- Please clarify the proposed clearing references for the project including:
  - Page 4-15 refers to clearing 11.5 acres of natural pine barrens habitat in the CGA portion of the Study Area
  - Page 4-15 refers to clearing and reduction in habitat of 11.11+/- acres
  - Page 5-5 refers to clearing 11 acres
  - Page 5-22 refers to clearing 11.11 acres
  - Page 5-36 refers to clearing 11.45 acres
  - Page 5-24 refers to clearing 11.98 acres
- Page 5-24 refers to a 40.73 acre project site. Please identify the 40 acre site, it’s location and explain how it relates to the proposal.
- Pages 5-22 and 23 refer to clearing of 8.89 acres of vegetation in the CGA and provides a table that indicates 5.54 acres of clearing is permitted and a net additional clearing of 3.5 acres is proposed for the project. Please clarify if the applicant seeks a waiver to clear 3.5 acres more than the standard permits.
- Please clarify the statements regarding the project site area of 10.82 acres with the statements that refer to more than 11 acres to be cleared for the project.
- Please specify if the applicant seeks a waiver for conformance with this Standard.

PBC2-9  
Sec.  
2.4

PBC2-10  
Sec.  
2.4

PBC2-11  
Sec.  
2.4

PBC2-12  
Sec.  
2.4

PBC2-13  
Sec.  
2.4

**Standard 5.3.3.6.2 Unfragmented Open Space**

- The document references property in the hamlet that was protected prior and unrelated to this project. Although the open space and land preservation efforts by the Town, County and State over many years is significant and supported for water resource and ecosystem protection, the project and past preservation efforts are not directly related to the project and therefore cannot be aligned directly or indirectly to this proposal or used as a mitigating factor for the project. (Pages 5-23 and 5-29)

PBC2-14  
Sec.  
2.4



- Please identify any open space that is contiguous or non-contiguous to the project site that is part of the project or offered as mitigation for the waivers requested.
- Page 5-27 refers to 145 acres in the ROD and Sewer District have already been preserved and the prior zoning “immortalizes their protection.” Please identify the location of the acreage and its relationship to this proposal.

↑  
PBC  
2-14  
cont.  
Sec.  
2.4

In summary, please submit the CGA Hardship and DRS applications for Commission review and consideration. No final decisions should be made on the project until the Project has received decisions by the Commission.

The proposal must conform to all other involved agency jurisdictions and permit requirements in effect on the project site. Thank you for your attention, and if you have any questions, please do not hesitate to contact me at (631) 218-1192.

Sincerely,



Julie Hargrave  
Policy and Planning Manager

cc: Judy Jakobsen, Executive Director  
John C. Milazzo, Counsel

# COUNTY OF SUFFOLK



**STEVEN BELLONE**  
SUFFOLK COUNTY EXECUTIVE  
DEPARTMENT OF PUBLIC WORKS

**DARNELL TYSON, P.E.**  
ACTING COMMISSIONER

December 26, 2023

**ERIC M. HOFMEISTER**  
DEPUTY COMMISSIONER

[kdougherty@southamptontownny.gov](mailto:kdougherty@southamptontownny.gov)

Town of Southampton, Town Board  
116 Hampton Road  
Southampton, NY 11968

Subject: *Supplemental Draft Generic Environmental Impact Statement (SDGEIS)  
Riverside Sewer District, Town of Southampton*

Ms. Dougherty:

The Town of Southampton's *Supplemental Draft Generic Environmental Impact Statement (SDGEIS)* for the proposed Riverside Sewer District was received by the Suffolk County Sewer Agency on December 12, 2023.

In areas concerning Wastewater Treatment and disposal, the Suffolk County Sewer Agency reserves the right to comment on this proposed project and would like to be informed of all actions taken pursuant to SEQR and to be copied on submittals of the EAF, DEIS, FEIS reports.

SCSA-1  
Sec. 2.11

*Comments:*

*In review of the documentation available it was noted that the project proposes to create a municipal sewer district (SD), construct, operate and maintain a sewage treatment plant (STP), and operate said SD. This project is within the jurisdiction of the Suffolk County Sewer Agency. As mentioned above; the Suffolk County Sewer Agency reserves the right to comment on this proposed project and would like to be informed of all actions taken pursuant to SEQR and to be copied on submittals of the EAF, DEIS, FEIS reports*

If you have any comments or questions, please contact me at (631) 852-4191.

Sincerely,

Craig A Platt  
Public Works Special Project Supervisor  
CAP/dv

cc: Janice McGovern, P.E.  
Boris Rukovets, P.E.

\\datacore01.county.suf\DPW\Sanitation\SewerAgency\SH - Southampton 0900\Town of Southampton\Riverside Sewer District - Comments  
12-26-23.docx

**SUFFOLK COUNTY IS AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER**



# TOWN OF SOUTHAMPTON

Department of Land Management  
Environment Division  
116 HAMPTON ROAD  
SOUTHAMPTON, NY 11968

Phone: (631) 287-5710  
Fax: (631) 287-5706



JAY SCHNEIDERMAN  
TOWN SUPERVISOR

JANICE SCHERER  
TOWN PLANNING AND  
DEVELOPMENT ADMINISTRATOR

MARTIN SHEA  
CHIEF ENVIRONMENTAL ANALYST

January 02, 2024

Janice Scherer, Town Planning and Development Administrator  
Town of Southampton Department of Land Management – Long Range Planning  
116 Hampton Road  
Southampton, NY 11968

## LETTER OF NON-JURISDICTION PURSUANT TO CHAPTER 325 (WETLANDS) OF THE TOWN CODE

*Lands Owned by the Town of Southampton and Now or Formerly Owned by Five Towns  
College*

*4, 6, 8, 9, 10, 11, 12 Enterprise Zone Drive, Riverside, NY  
SCTM Nos.: 900-141-1-9.14. 9.17. 9.25, 9.29, 9.30, 9.31 and 9.32*

*Proposed Action: Construction of Sewage Treatment Plan, Effluent Injection Wells, New  
Access Road, Relocated Roadway, Fences, Land Clearing, as depicted on the "STP  
Concept Plan Alternative 3 Injection Wells For Riverside STP Situated at Riverside, Sheet  
No. 1, as prepared by Nelson + Pope Engineers Architects Surveyors, dated 4/3/17*

Dear Ms. Scherer:

Based upon a field assessment completed on Tuesday, January 02, 2024, the proposed activities are located approximately 216 feet landward of the nearest town regulated freshwater wetlands to the north, as shown on the attached "Suffolk Federal Credit Union Site Plan", sheet A-1.0, as prepared by KDA Holdings, last dated 12/22/2005. As such, a town wetlands permit is not required to proceed with phase I of this project.

MS-1  
Sec. 2.4

If I can be of any further assistance, please let me know. Thank you for your cooperation.

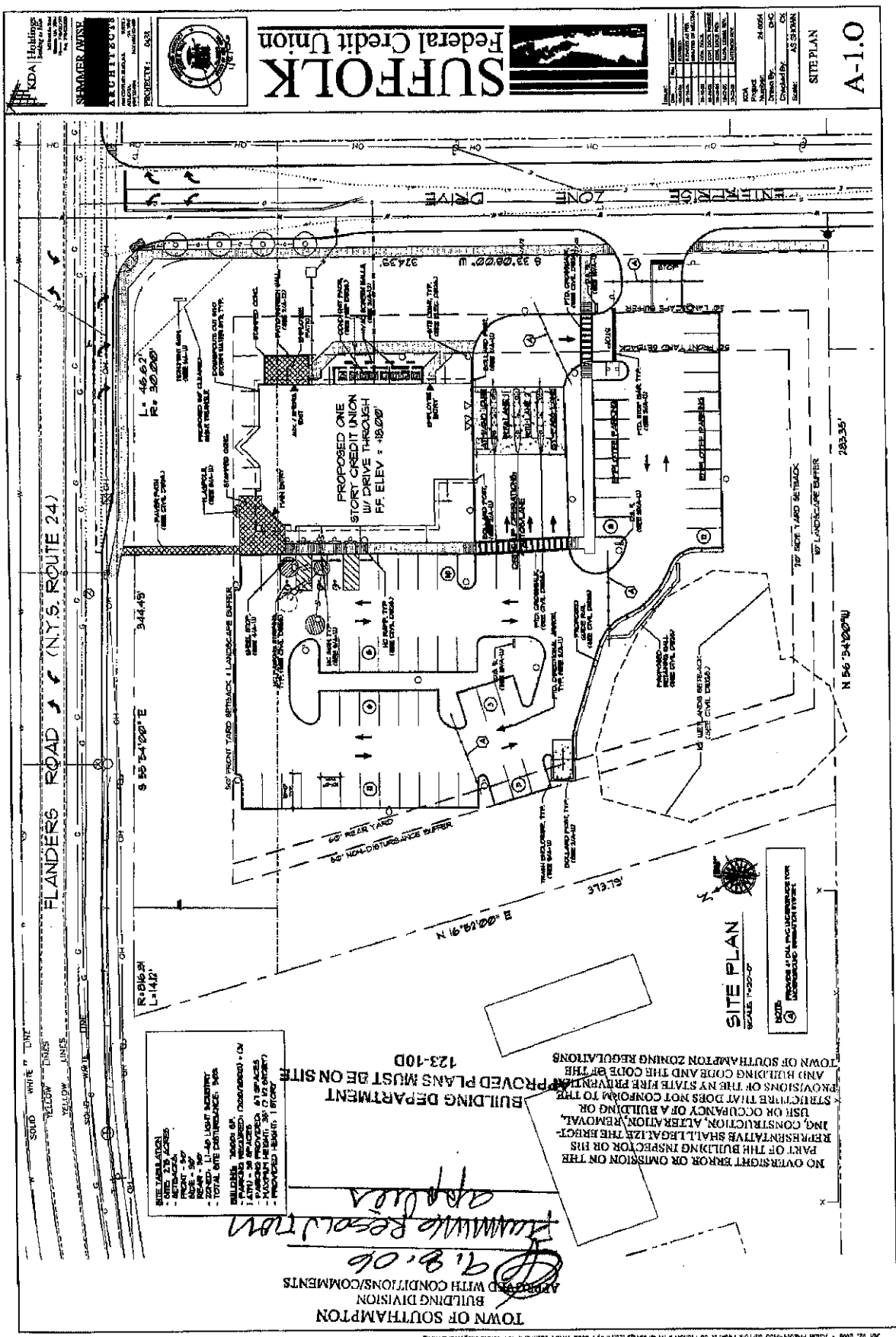
Sincerely,

Martin Shea  
Chief Environmental Analyst

Attachment: "Suffolk Federal Credit Union Site Plan", sheet A-1.0, as prepared by KDA Holdings, last dated 12/22/2005.

THE SIGN PERMIT NUMBER SHALL BE AFFIXED/DISPLAYED ON THE LOWER RIGHT CORNER OF EACH SIGN USING 3/4" (MIN) HEIGHT LETTERING PER S.330-208-A(1)

Permit approval is conditional. Subject to field inspection.



**TOWN OF SOUTHAMPTON**  
 BUILDING DIVISION  
 APPROVED WITH CONDITIONS/COMMENTS  
 9.18.06  
 Approved  
 Building Resolution

**BUILDING DEPARTMENT**  
 APPROVED PLANS MUST BE ON SITE  
 123-10D

NO OVERSIGHT ERROR OR OMISSION ON THE PART OF THE BUILDING INSPECTOR OR HIS REPRESENTATIVE SHALL LEGALIZE THE RECTANGULAR CONSTRUCTION, ALTERATION, REMOVAL, USE OR OCCUPANCY OF A BUILDING OR STRUCTURE THAT DOES NOT CONFORM TO THE PROVISIONS OF THE NY STATE FIRE PREVENTION AND BUILDING CODE AND THE CODE OF THE TOWN OF SOUTHAMPTON ZONING REGULATIONS

**SITE PLAN**  
 SCALE 1/8" = 1'-0"

NO.	DATE	DESCRIPTION
1	08/11/06	ISSUED FOR PERMIT
2	08/11/06	ISSUED FOR PERMIT
3	08/11/06	ISSUED FOR PERMIT
4	08/11/06	ISSUED FOR PERMIT
5	08/11/06	ISSUED FOR PERMIT
6	08/11/06	ISSUED FOR PERMIT
7	08/11/06	ISSUED FOR PERMIT
8	08/11/06	ISSUED FOR PERMIT
9	08/11/06	ISSUED FOR PERMIT
10	08/11/06	ISSUED FOR PERMIT

**FEDERAL CREDIT UNION**



**SEMMER ANNE**  
 ARCHITECT  
 1000 W. 10TH ST.  
 SUITE 200  
 NEW YORK, NY 10014  
 TEL: 212-261-1111  
 FAX: 212-261-1112  
 WWW: SEMMER.COM

**KDA Holdings**  
 1000 W. 10TH ST.  
 SUITE 200  
 NEW YORK, NY 10014  
 TEL: 212-261-1111  
 FAX: 212-261-1112  
 WWW: KDAHOLDINGS.COM

**A-1.0**  
 SITE PLAN

January 9, 2024

Town Board

Town of Southampton

116 Hampton Road

Southampton, NY 11968

Re: Supplemental Draft Generic Environmental Impact Statement – Riverside Sewer District  
Dated November 2023

Dear Board Members:

The comments made in this document are in response to the above referenced Supplemental Draft Generic Environmental Impact Statement for the Riverside Sewer District. (SDGEIS) Please do not confuse the worthiness of the project with the critical comments that I will be outlining herein. I believe the Riverside Sewer District will be a good project for the community, the Town of Southampton, and the environment including the Peconic Bay estuary.

KCw-1  
Sec. 2.5

The plan is to construct a new sewage treatment plant that will service the Riverside community. It will be either a 500,000 gallon per day (gpd) plant as noted on page 1-10 and 6-20, or an 800,000 gpd plant as noted on pages 1-22, 6-22 and 9-10. There is little guidance in the document about the size and peak flow as peak flow could be 800,000 gpd or 2,344,000 gpd depending on which page one is reading.

KCw-2  
Sec. 2.2

The SDGEIS as written contains a myriad of misinformation, factual errors on a grand scale and unsupported conclusions. Some errors contained in the document are carried over from previous reports that were not properly fact checked and point to the lack of responsibility exhibited by the authors of this document.

KCw-3  
Sec. 2.13

Starting on page 1-3 the document states that the review now includes: "Assessment of the preferred project which calls for the construction of a Membrane Bioreactor (MBR) or a Sequencing Batch Reactor (SBR) as determined by a final Technical Design Report, with a maximum effluent discharge goal of 10 mg/l or less." I assume they are speaking about the nitrogen discharge being kept to 10 mg/l but it could refer to a variety of other parameters. Further review finds that there is not any real discussion about the type of facility being proposed where on page 1-25 there is a conclusion offered that "N+P evaluated MBR, SBR and other technologies currently available for wastewater treatment and **concluded** that the SBR technology would be the best fit for the project from the standpoint of operational flexibility and cost assessment. (emphasis added)

KCw-4  
Sec. 2.3

KCw-5  
Sec. 2.3

I should note that SBR technology has been available for at least 30 years and is cumbersome, expensive to build and costly to maintain. For an engineering firm to conclude with not backing information that this is the right fit for the area and the Town, is irresponsible and factually lacking. MBR technology is more recent, and several generations of membranes have been successfully used in wastewater treatment with the newest designs being quite economical and offering lower maintenance costs to the

KCw-6  
Sec. 2.2

KCw-7  
Sec. 2.2

end user. Additionally, MBR technology can provide near drinking water quality effluent which would minimize impacts to the environment. A recent pilot study undertaken at the West Woodside Suffolk County Wastewater Treatment facility that utilized enhanced MBR technology showed non detect levels for BOD, coliforms, total suspended solids and phosphorous. Ultra-low concentration of <3 mg/l total nitrogen in the effluent was achieved. For N+P to dismiss the MBR technology, as it appears to be the case, is a disservice to the community, the Town, and the environment.

KCw-8  
Sec. 2.3

Page 1-13 notes the network of subsurface leaching pools covering an area of 6.6 acres will have an estimated cost of \$1,120,000. If true, this would be a cost of \$1,750.00 per leaching pool which is entirely overly optimistic, and unrealistic.

KCw-9  
Sec. 2.12

Page 1-16 at the end of the top paragraph has the following statement, "To prevent additional impacts from sewage disposal on the underlying aquifer and nearby Peconic River Estuary, area ponds, brooks and fresh and tidal creeks and wetlands, limits have also been established on the volume of untreated wastewater that can be generated by ROD development." Is there any untreated wastewater anticipated from future ROD development, or is this comment just superfluous? Again, on page 1-16 it is noted that the service area contributes approximately 5,976 pounds of nitrogen per year to the Peconic River. I assume that number is extrapolated from the 4.58 mg/l concentration described on page 1-17 coming from existing conventional onsite systems.

KCw-10  
Sec.  
2.5

KCw-11  
Sec. 2.3

Page 1-17 states that the PEP (Peconic Estuary Partnership) was created to achieve a goal of 0.45 mg/l TN in all waters and 0.40 mg/l TN in shallow waters. As noted above, the SDGEIS is figuring a design of discharge at no more than 10 mg/l or some 20 times the recommended loading. If this is the case, why are we pursuing the plan as laid out?

KCw-12  
Sec. 2.3

On pages 1-19 through 1-21 economic benefits are shown in 2015 dollars. Why haven't they been adjusted to provide a current snapshot of the anticipated revenues?

KCw-13  
Sec. 2.2

Page 1-21, under the heading of Description of the Proposed Action it is noted that as part of the engineering assessment, several available state of the art STP technologies were evaluated...including Sequencing Batch Reactors, Membrane Bio-Reactor and Biologically Engineered Single Sludge Treatment, (BESST). Apparently, the BESST was discarded without further review as evidenced on the following pages 1-22 and 1-23 where the technology isn't described in any detail or discussed further.

KCw-14  
Sec. 2.2

On page 1-22 one of the advantages of an SBR is that it is "Easily upgradeable to include secondary and tertiary treatment by installing mixers and filters. "Are these "upgrades" part of the proposal under consideration or are they going to be added and subject to further reports, reviews and costs? If they are included, what do they consist of and how will they be incorporated into the design?

KCw-15  
Sec. 2.2

In Section 1.4.1 it is noted that the MBR alternative has a smaller overall footprint, yet the document has a stated preference for the SBR alternative. Is this because it is a more expensive alternative that NPV has experience in designing and administering? It should be noted that an MBR facility has hydraulic flexibility as described for the SBR alternative that is equally adjustable with controllers.

KCw-16  
Sec. 2.2

The MBR as described has a smaller footprint, produces higher biomass concentrations for higher quality treatment, less sludge production, longer retention times and a highly efficient treatment process. Yet apparently a larger footprint with lesser quality effluent is preferable. This contrasts with the statement on page 1-25 that "N+P evaluated MBR, SBR and other technologies currently available

KCw-17  
Sec. 2.2



for wastewater treatment and concluded that the SBR technology would be the best fit for the project from the standpoint of operational flexibility and cost assessment.” Why?

KCw-17  
cont.  
Sec. 2.2

Page 1-25 finds that an odor control system would be designed and installed, if needed, yet such a system is not described on the previous pages where details are set forth for the components of SBR and MBR systems. It is stated that the operator is likely one part time employee who would be responsible for monitoring all conditions including nitrogen loading from system effluent. How is one part-time employee going to be responsible for operations and monitoring?

KCw-18  
Sec.2.2

KCw-19  
Sec. 2.6

Effluent leaching area: First, it seems like the decision to use leaching pools has already been made based on the discussion provided in this section regardless of the options for injection wells and created wetlands that were mentioned. Details on the effluent leaching area differ between the area required as shown on page 1-22 and that shown on page 1-25. In most cases, the leaching pools will only provide a 2-foot separation from the bottom to the groundwater level, and due to the discharge, there is likely to be some mounding of the groundwater due to the discharge. This is not discussed. Additionally, to maximize the discharge distance to groundwater, should shallower pools or perhaps a drain field (leaching field) be considered instead of the large leaching field with 10-foot leaching pools?

KCw-20  
Sec. 2.2

As a proposed mitigation measure, on page 2-9 it is noted that “The advanced tertiary level of treatment that will be provided and control of stormwater ...will help reduce or eliminate potential soil, groundwater and subsurface impacts.” Page 1-22 notes that for the N+P preferred option of an SBR, the plant would be “easily upgradeable to include secondary and tertiary treatment.” Again, contradictory information is being provided without clarity to the reader. This is exacerbated by statements on page 3-8 where drainage outfalls are noted to a lake and the Peconic River. Can the stormwater discharges be eliminated, and water diverted to the STP in an effort to eliminate some of the stormwater runoff which is a stated goal in many diverse water reports spanning decades of research and recommendations?

KCw-21  
Sec. 2.2

On page 2-10 it is noted that “Site grading operations will be undertaken in a manner that supports the reincorporation of excavated material back into the proposed leaching area. How is this going to happen as each leaching pool will require excavation of over 10 yards of material which will need to be removed rather than reincorporated into the site. For 640 pools, there is probably nearly 6,000 cubic yards of material that will need to be addressed.

KCw-22  
Sec. 2.2

Page 3-11 notes the Lloyd Aquifer is approximately 1,000 feet deep in the Riverside area and is saline. I’m not sure about the Lloyd Aquifer being saline as many papers by the USGS as well as public policy for decades has called for the protection of the Lloyd as a future water source if the other two aquifers become contaminated.

KCw-23  
Sec. 2.3

Also on page 3-11 it is stated that, “...stormwater runoff does not inherently contain significant concentrations of contaminants but is very effective at ‘washing’ them from streets, parking lots, sidewalks, concrete pads outdoor materials storage areas, lawns, gardens and other surfaces, mobilizing both soluble and non-soluble materials, and transporting them to areas of deposition by point and nonpoint discharges where they accumulate in groundwater and surface waters.” What does this mean? Page 3-14 notes that a threat to groundwater comes from, among other sources, “stormwater runoff recharged into groundwater from recharge basins, drywells and leaching pools...”. Page 3-18 notes recommendations for treatment of stormwater to include green infrastructure yet it does not

KCw-24  
Sec. 2.2

KCw-25  
Sec. 2.2

seem that such consideration has been attempted, nor has the option of treating some of the stormwater at the STP.

↑ KCw-25  
cont.  
Sec. 2.2

Page 3-18 also notes that there will be 8.49 acres of lawn or reseeded land. That amount of lawn seems excessive and native vegetation should be used instead of lawn. It also would seem contrary to the requirements that “No more than 15% of any site may be established in fertilizer dependent vegetation under the current CLUP and CPBOD standards.” as noted on page 3-21. Furthering the confusion is the statement on page 3-22 that “all proposed site uses will conform with the 15% restriction, and landscaping will use native species which do not require fertilization chemicals and irrigation to the maximum extent practicable.

KCw-26  
Sec. 2.4

Under the heading of Increased sewer discharges it is noted that “Wastewater discharges are subject to routine monitoring under the standards and requirements of a SPDES permit and operators, inspectors and maintenance personnel must be trained to oversee facilities and be available 24 hours/day 7 days/week. This may be difficult for the one part time operator noted previously and will be impossible when the plant “will be operated remotely by computers and, therefore, will be unmanned as noted on page 5-12 and 5-15.

KCw-27  
Sec. 2.3

In Section 3-3 found of pages 3-24 and 3-25 the Mitigation measures seem more like bullet point reiterations of a variety of requirements of the SCDHS, SCWA, SCSC and other involved agencies as opposed to actual mitigation measures specific to project at hand.

KCw-28  
Sec. 2.13

On page 5-19 there is discussion of stormwater runoff and recharge, particularly at the STP site. Why is there no discussion about collecting and treating stormwater at the STP from the site and perhaps some of the adjacent roadways, especially where existing drainage structures will be removed and possibly replaced?

KCw-29  
Sec. 2.2

Page 5-23 notes that the sewage recharge area will represent the largest area of clearing, as it must be free of trees, shrubs and roots. This area will however be reseeded preferably with native pine barrens cover vegetation after initial clearing. Other sections of the document mention lawns, landscaping, and native vegetation. Can we be specific about what is being proposed as there are contradictory statements on the following page.

KCw-30  
Sec. 2.4

Due to the relatively shallow depth to groundwater, why wasn't a drain field considered for the recharge of the effluent. Use of a drain field would increase the percolation of the effluent by several feet before contacting the groundwater table.

KCw-31  
Sec. 2.2

Page 5-25 notes that clearing will be restricted at the facility between December 1 through February 28 when NLEBs are not expected to be present. Does this mean that this is the only time when clearing is permitted or is it prohibited during this time?

KCw-32  
Sec. 2.4

It is noted on page 5-36 “...that the proposed STP will have a positive overall effect on the environment including the SGPA by providing the highest sewage treatment possible and reducing overall nitrogen concentrations in groundwater.” This is largely true, except that the author's preference for an SBR facility does not make this a reality. Modern MBR technology is far more effective than SBR's in treating water to near drinking water quality standards, with a smaller footprint and at a lower cost.

KC-33  
Sec. 2.2

Page 5-42 opens discussion on utilization of discharging treated effluent to constructed wetlands and further notes that this is not the preferred alternative. I'll address this issue a little later.

KCw-34  
Sec. 2.2

On page 7-14 odor control is discussed and the conclusion is reached that "Regarding odors, a masonry structure will enclose the STP equipment and treatment processes, thereby containing odors. If odors become an issue, odor control technologies will be installed." Contrast this statement with those on page 1-9 where it is stated that "odor control technology will be provided." The authors obviously thought about the issue but seem not to have a good grasp of the consequences of not providing adequate odor control, especially for a SBR option as they obviously prefer.

KCw-35  
Sec. 2.2

In Section 9, Alternatives, Section 9-2 addresses the discharge of treated effluent to Constructed Wetlands. As described, this would be a 4.3 acre constructed wetland created in the dredge spoil area adjacent to the Peconic River. Wetlands would be 'constructed' at between 7+/- feet to 12 +/- feet above msl. This sounds more like a recharge basin rather than a constructed wetland. The entire discussion of the use of constructed wetlands is rather convoluted and needs to be reevaluated, especially where the costs are discussed on page 9-9. It should be noted that the cost comparison compares the cost of installing 100-foot-deep recharge wells to the Lloyd aquifer. The Lloyd aquifer is approximately 1,000 feet deep and cost comparisons using the 100-foot-deep wells are inaccurate at best.

KCw-36  
Sec. 2.2

KCw-37  
Sec. 2.3

The cost comparison to the use of leaching pools assumes that each leaching pool can be procured, delivered, installed and connected for \$1,750/pool. This is a fantasy. The cost of 2 10-foot leaching rings, 5 foot tall, along with a footing ring, and a 10' diameter low dome is more than \$2,000.00 from a local supplier. These costs don't include delivery, excavation, machinery, and labor for the installation.

KCw-38  
Sec. 2.12

The discussion of the use of injection wells is similarly flawed as the 100-foot depth for the wells is a continuing error that apparently dates to a 2015 Arcadis report that identifies the depth to the Lloyd aquifer as 100 feet. Page 9-12 correctly notes that the Lloyd Aquifer is between 1,000 and 1,500 feet deep, but the logic of using 100-foot-deep wells carries through the discussion.

KCw-39  
Sec. 2.3

There is no real discussion of the use of alternative technologies in the Alternatives Section, despite being required as noted on page 9-1. MBR Technology and BEEST were inadequately addressed in the February 2022 Arcadis report and the recommendations taken in this document continue the inadequacy.

KCw-40  
Sec. 2.2

A properly designed MBR Sewage Treatment Plant would occupy less than half of the footprint being discussed for the SBR alternative and would produce an effluent that approaches drinking water quality which would be a huge improvement for the environment of the community, the Town and the Peconic Estuary. An MBR using the latest technology would be more cost effective, can be completed faster and would be less expensive to operate in the short and long term. Serious consideration needs to be given to this alternative which can have many more positive benefits than the project as currently considered.

KCw-41  
Sec. 2.2

Thank you for your consideration regarding this matter. I reiterate the fact that the project of building and operating an STP for the Riverside area is a good and necessary project with far reaching benefits for the community, the Town and the Peconic River and Estuary. Using Enhanced MBR technology the results will be better quality effluent; construction would be quicker and capital costs and operational

KCw-42  
Sec. 2.2



and maintenance costs would be more economical than the SBR scenario being currently proposed. I am available to discuss any, and all aspects of the criticism outlined herein.

↑ KCw-42  
cont.  
Sec. 2.2

Very truly yours,

Ken Coenen

631-295-7804

# COUNTY OF SUFFOLK



**STEVEN BELLONE**  
SUFFOLK COUNTY EXECUTIVE

**DEPARTMENT OF ECONOMIC DEVELOPMENT AND PLANNING**

**SARAH LANSDALE**  
COMMISSIONER

**ELISA PICCA**  
CHIEF DEPUTY COMMISSIONER

January 10, 2024

Town of Southampton  
116 Hampton Road  
Southampton, NY 11968  
Attn: Sundy A. Schermeyer, Town Clerk

SEQRA Lead Agency Coordination  
Re: SEQRA on Adopted Reso 630  
Municipal File No.: Adopted Resolution 630 Supplemental Generic Environmental  
Impact Statement for siting and construction of a Community  
Sewage Treatment Plant in the Hamlet of Riverside  
S.C.T.M. No.: N/A  
S.C.P.C. No.: SH-23-LD

Dear Ms. Schermeyer:

Your notification for SEQR Coordination was received by our agency on May 1, 2023.

Please be advised that our agency, the Suffolk County Planning Commission, has no objection to the Town of Southampton assuming Lead Agency status for the above referenced.

The Suffolk County Planning Commission reserves the right to comment on this proposed action in the future and wants to be kept informed of all actions taken pursuant to SEQRA and to be provided with copies of all EAF's, DEIS's and FEIS's, etc. Please note that pursuant to New York State General Municipal Law section 239 and Article XIV of the Suffolk County Administrative Code, prior to final approval, this action should be referred to the Suffolk County Planning Commission for review.

SCPC-1  
Sec.  
2.11

Note: Please be advised that this letter is a correction to the June 14, 2023 Suffolk County Planning Commission letter which is enclosed for reference. The June 14, 2023 letter had the incorrect S.C.P.C. No. and errantly added under "Comments:" a reference to a Suffolk County Planning Commission Resolution that is not applicable.

Very truly yours,

*John Corral*  
By Christine DeSalvo

John Corral, Environmental Projects Coordinator  
Division of Planning & Environment

JC/cd  
Enc.

# COUNTY OF SUFFOLK



**STEVEN BELLONE**  
SUFFOLK COUNTY EXECUTIVE

## DEPARTMENT OF ECONOMIC DEVELOPMENT AND PLANNING

**CHRISTOPHER GONZALEZ**  
CHIEF DEPUTY COMMISSIONER

**SARAH LANSDALE**  
COMMISSIONER

**ELISA PICCA**  
DEPUTY COMMISSIONER

June 14, 2023

Town of Southampton  
116 Hampton Road  
Southampton, NY 11968  
Attn: Sundy A. Schermeyer, Town Clerk

SEQRA Lead Agency Coordination  
Re: SEQRA on Adopted Reso 630  
Municipal File No.: Adopted Resolution 630 Supplemental Generic  
Environmental Impact Statement for siting and construction  
of a Community Sewage Treatment Plant in the Hamlet of  
Riverside  
S.C.T.M. No.: N/A  
S.C.P.C. No.: RH-23-LD

Dear Ms. Schermeyer:

Your notification for SEQR Coordination was received by our agency on May 1, 2023.

Please be advised that our agency, the Suffolk County Planning Commission, has no objection to the Town of Southampton assuming Lead Agency status for the above referenced.

The Suffolk County Planning Commission reserves the right to comment on this proposed action in the future and wants to be kept informed of all actions taken pursuant to SEQRA and to be provided with copies of all EAF's, DEIS's and FEIS's, etc. Please note that pursuant to New York State General Municipal Law section 239 and Article XIV of the Suffolk County Administrative Code, prior to final approval, this action should be referred to the Suffolk County Planning Commission for review.

Comments:

Please see the attached Suffolk County Planning Commission Resolution.

Very truly yours,

*Andrew P. Freleng*

By Christine DeSalvo

Andrew P. Freleng, Chief Planner  
Division of Planning & Environment

APF/cd  
Enc.

**File No. RH-23-01**

Resolution No. ZSR-23-13 of the Suffolk County Planning Commission  
Pursuant to Sections A14-14 to thru A14-25 of the Suffolk County Administrative Code

WHEREAS, pursuant to Sections A14-14 thru A14-25 of the Suffolk County Administrative Code, a referral was received on January 20, 2023 at the offices of the Suffolk County Planning Commission with respect to the application of "**Town of Riverhead Downtown Riverfront Overlay District**" located in the Town of Riverhead

WHEREAS, said referral was considered by the Suffolk County Planning Commission at its meeting on **March 1, 2023**, now therefore, be it

RESOLVED, pursuant to Section A14-16 of the Suffolk County Administrative Code and Section 239-m 6 of the General Municipal Law, the referring municipality within thirty (30) days after final action, shall file a report with the Suffolk County Planning Commission, and if said action is contrary to this recommendation, set forth the reasons for such contrary action,  
Be it further

RESOLVED, that the Suffolk County Planning Commission **Approves** the Town of Riverhead Downtown Riverfront Overlay District with the following Comments:

Comments:

1. Additional descriptive elements with respect to the proposed Overlay District would be beneficial including:
  - Area in acres or square miles of the Overlay District
  - Total number and listing of (Suffolk County Tax Map No.) parcels within the Overlay District
  - Textual description of the proposed boundaries of the Overlay District
  - Assurance that newly prohibited uses can be found as allowable uses in other zoning districts of the Town and that there are provisions in the Town Code for the continuation/expansion of pre-existing, non-conforming uses.
  
2. The Town, when considering the variety of accommodations in the Overlay District, should revisit §301-221.3 uses, items T. & U., and clarify the prohibition of "Vacation Time Share Properties" or "Air B&Bs". It may be warranted to have a phase-in schedule of such uses as conditions dictate.

Town of Riverhead  
 Downtown Riverfront Overlay District

**COMMISSION ACTIONS OF APPROVED RESOLUTION**

	<b>AYE</b>	<b>NAY</b>	<b>ABSTAIN</b>	<b>ABSENT</b>
BALDWIN, STEPHANIE – At Large	X			
CASEY, JENNIFER - Town of Huntington	X			
CONDZELLA, JOHN – Town of Riverhead				X
COVERDALE, JOHN – Town of Brookhaven	X			
DOTY, DAVID – Town of East Hampton	X			
FINN, JOHN - Town of Smithtown	X			
FLYNN, DANIEL – Town of Southampton	X			
GALLE, ELIZABETH – Town of Shelter Island	X			
GERSHOWITZ, KEVIN G.- At Large				X
KAUFMAN, MICHAEL - Villages under 5,000	X			
KITT, ERROL – At Large				X
LEWIS, LASCHECA, Town of Babylon				X
MCCARTHY, THOMAS - Town of Southold	X			
MCCARTHY, TIMOTHY – Town of Islip	X			
PERRY, LISA – Villages Over 5,000	X			

Motion: Commissioner Flynn

Present: 11

Seconded: Commissioner Kaufman

Absent: 4

Voted: 11

Abstentions: 0

Recused: 0

DECISION: Approved



RECEIVED

2024 JAN 16 P 1:37

TOWN CLERK'S OFFICE  
TOWN OF SOUTHAMPTON

Jeffrey W. Szabo  
Chief Executive Officer

Administrative Offices: 4060 Sunrise Highway, Oakdale, New York 11769-0901  
(631) 563-0353  
Fax: (631) 563-0370

January 11, 2024

Sundy Schermeyer  
Town Clerk  
Town of Southampton  
116 Hampton Road  
Southampton, NY 11968

Re: Riverside Sewer District - Town of Southampton  
SEQRA Supplemental DGEIS  
SCTM# Various Tax Map Numbers - 468± Acres

Dear Ms. Schermeyer:

The Suffolk County Water Authority (SCWA) is in receipt of the Supplemental Draft Generic Environmental Impact Statement for the captioned project and appreciates the opportunity to provide additional comments on the proposal.

The DGEIS as submitted indicates that several STP technologies were evaluated to determine which system would be best suited for the community. The conclusion was that both the Membrane Bio-Reactor (MBR) and Sequencing Batch Reactor (SBR) technologies would be most appropriate.

SCWA-1b  
Sec. 2.6

At this time SCWA supports the use of the MBR system with the understanding that the operators and maintenance personnel will be required to undergo rigorous certified training in the operation, maintenance, and monitoring of such systems.

Additionally, SCWA supports and encourages onsite groundwater sampling both up and down gradient of the proposed leaching fields while also providing the sampling results to SCWA.

SCWA-2b  
Sec. 2.6

These comments are consistent with those provided in our agencies prior comment letter of May 22, 2023, and our agency's strong belief that regulated and unregulated contaminants should be treated at the source, not at the wellhead.

SCWA-3b  
Sec. 2.6

If your agency and/or consultant have any questions or concerns, you would like to discuss about this project please call Joseph Pokorny, Deputy CEO of Operations at 631-563-0202.

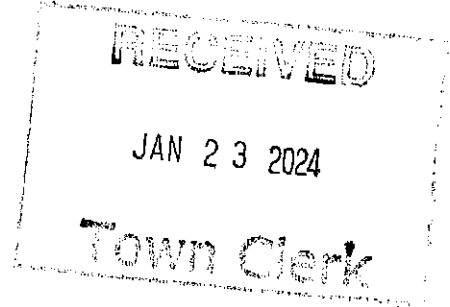
Very truly yours,  
  
Jeffrey W. Szabo

Cc: Charles Lefkowitz, Chairman, SCWA  
Joseph Pokorny, Deputy CEO Operations, SCWA

TB Meeting 1/23/24  
P.H.#2

32

Jeffrey L. Seeman  
Certified Environmental Professional  
PO Box 130  
East Quogue, NY 11942  
631.872.9116  
jeffrey.seeman@icloud.com



January 23, 2024

Town of Southampton Town Board  
C/o Town of Southampton Department of Land Management  
Janice Scherer, Town Planning and Development Administrator  
116 Hampton Road  
Southampton, NY 11968

RE: SEQRA Public Comment: Supplemental Draft GEIS and Sewer District Hearing for the Proposed Riverside Sewer District: January 23, 2024

Dear Ms. Scherer,

For the SEQRA record, I am Jeffrey Seeman, national board-certified environmental professional, and consultant to the Riverhead Town Board, who are also Commissioners of the Riverhead Sewer District. The Riverhead Town Board has engaged my professional services to review and comment on the Proposed Riverside Sewer District and its SDGEIS.

For the first time in history, members of Southampton Town Board shall serve as Sewer District Commissioners and assume legal responsibilities for the Riverside Sewer District. Although managing a municipal wastewater treatment plant and sewer system is new territory for Southampton, the Riverhead Town Boards have been managing and operating sewer system and wastewater treatment facilities for nearly 100 years.

JS1w-1  
Sec. 2.5

As previously stated in the DSGEIS comment letter and summary statements made and submitted at the December 12, 2023-SEQRA Public Hearing, the Riverhead Town Board supports the common and mutually beneficial goals of:

JS1w-2  
Sec. 2.14

- Improving water quality of the Peconic River and Peconic Estuary
- Revitalization of the Riverside community.
- Sustainable development through Urban Renewal programs that are compatible with Riverhead's Ongoing Urban Renewal efforts and Downtown Revitalization.

The environmental and socio-economic benefits of Riverhead and Southampton government programs are interwoven, long term and improve the quality of life along both sides of the Peconic River Corridor.

The proposed Riverside Sewer District and its collection and treatment infrastructure are crucial milestones for Southampton to advance these shared objectives, and to redevelop and revitalize Riverside.

During the December 12, 2023, SEQRA Hearing it may have surprised the Lead Agency that Riverhead requested the Riverside Sewer District Boundary include the Suffolk County

JS1w-3  
Sec. 2.2



government facilities and jail. Riverhead's purpose of removing the County's wastewater flow from the Riverhead Sewer District is not for increasing development in Riverhead. Riverhead's purpose is for its future environmental protection through land preservation.

↑  
JS1w-3  
cont. 2.2

Because Riverhead does not have the CPF revenue that other Towns have amassed, Riverhead must maximize opportunities for preserving open space and farmland through an enhanced Transfer of Development Rights Program. The proposed revisions to the TDR Program identify land north of the Historical Sound Avenue Corridor as a Sending Area. This is agricultural land, currently zoned for two-acre residential development and is unsewered.

JS1w-4  
Sec. 2.2

The proposed Receiving Areas are located along the western section of Main Street. This region is sewered or can be easily connected to our existing system. This area is contiguous to the Peconic River Corridor, with existing structures primarily using inadequate sanitary systems, which like Riverside, are adding nitrogen loads to the Peconic Estuary.

JS1w-5  
Sec. 2.2

The burden of treating the wastewater from outside the RSD has reduced the District's capacity of the treatment plant and reduced availability for units within the RSD to connect. The out of District flow is significantly impacting Riverhead's farmland preservation efforts and simultaneously reducing our ability to enhance water quality improvements for the Peconic Estuary.

JS1w-6  
Sec. 2.2

Riverhead does not generate the CPF money necessary to preserve these remaining 7,000 acres of farmland without new land preservation strategies, including novel TDR programs. This goal is stated in Riverhead's Updated Comprehensive Plan scheduled to be completed in Spring 2024.

JS1w-7  
Sec. 2.2

The County facilities account for approximately 100,000 GPD of the RSD daily flow. Based on the Agreement between Riverhead and Suffolk County this flow is subjected to a multiplier of 1.75 above the typical (in District) sewer fee. Therefore, the County could realize a reduction in fees if their disposal was removed from Riverhead and included in the Riverside District. Additionally, including the County within the proposed Riverside District, provides revenue that can reduce residential user sewer fees in the newly created District. This is a critical requirement for obtaining project funding. Inclusion will establish financial stability for Phase 1, because it provides an immediate income stream.

JS1w-8  
Sec. 2.2

After review of the following documents:

- The proposed Boundary Map of the Riverside Sewer District, April 3, 2017.
- The SDGEIS-November 2023, prepared by Nelson & Pope.
- The Community Preservation Fund (CPF) Water Quality Improvement Program Application for Funding for, "Riverside Sewer System Year 2 Planning & Design," prepared by the Town of Southampton, dated June 2016.
- Town of Southampton Code Chapter 140: Article VI Water Quality Improvement
- Town of Southampton "Request for Qualifications for Professional Municipal Sewer Engineering Services for the Riverside Sewer Improvement Project"
- Riverside Revitalization Sewage Treatment Plan Clean Water State Revolving Fund (CWSRF) Engineering Report, revised June 2023, prepared by Nelson & Pope.
- Sections of, "DGEIS Riverside BOA, Revitalization Action Plan and Zoning Amendments, October 2015," prepared by Nelson, Pope & Voorhis.

- o RFQ Exhibit K-Estimated Collection and Pumping System Layouts.
- o RFQ Exhibit N- Response Letter to Value Engineering Study (June 16, 2023, Nelson & Pope.
- o Town of Southampton, NY Riverside Revitalization Sewage Treatment Plant and Collection System Value Planning Final Report, revised February 2022” prepared by ARCADIS.

During review of these documents, one finds no statements describing the volume of wastewater generated by the Suffolk County facilities, its disposal method, description of existing sanitary infrastructure, or relevance of the facilities to the proposed Riverside District. Pursuant to SEQRA, even under the SDGEIS process, the Lead Agency is obligated to take the pre-requisite Hard Look at new information as it is discovered. JS1w-9 Sec. 2.1

As stated at the December 12, 2023, Hearing, the Lead Agency elected not to exercise its option to have a formal Scope for the SDGEIS or hold a public Scoping meeting to identify issues to be considered for the Final Scope and Supplemental DGEIS. JS1w-10 Sec. 2.1

This decision removed Riverhead’s ability to recommend the Scope include the County facilities for inclusion in the proposed District boundary, study its impact potential as part of the SEQRA environmental assessment, and/or address this area’s wastewater treatment as an SDGEIS “Alternative.” Instead, the SDGEIS Alternative Section discussed connection from the proposed Riverside District to the Riverhead Wastewater Facility. However, this option was eliminated as early as 2014, and therefore was a known dead end. Based on that history alone, that Alternative should have been excluded from the Scope. JS1w-11 Sec. 2.1

If the County government facilities were excluded by simple error and lack of knowledge regarding existing conditions, then under SEQRA, it must now be considered “new information,” requiring a full SEQRA level evaluation, the equivalent of a Supplement to the Supplemental DGEIS. The statements offered by Riverhead are not simply a public comment to the SDGEIS, with anticipation of “possible connection in the future by expanding the district or via an out of district agreement.” That type of response in a Final GEIS fails to provide accurate description of existing area wide wastewater conditions, does not provide an accurate generic impact assessment, and potentially creates a major flaw in the SGEIS SEQRA review process. Consequently, the SEQRA Findings Statement could theoretically become equally deficient. JS1w-12 Sec. 2.1

**Comment 1.23.24.1**

There are conflicting statements within the applications, studies and reports regarding the existing wastewater flow generated from within the Proposed Riverside District Boundary. None of the existing flows generated by Suffolk County facilities, located in Riverside, were included in the existing conditions description. JS1w-13 Sec. 2.2

Descriptions stated in the studies and reports claim, the Riverside Sewer District project is designed to accommodate an existing flow from 840 housing units and land uses located within the 440-acre proposed sewer district of 171, 072 GPD. However, the Theoretical Development Scenario of the Riverside Overlay District will provide 192,000 SF of retail and professional space “that will support market demand” and 2,300 new housing units all of which have been projected a need for accommodating an additional 538,065 GPD from the new development. The JS1w-14 Sec. 2.2



recommended combined flows of existing land use and future land uses (for planning, engineering design and construction) is 800,000 GPD. Based on this recommended design flow:

JS1w-14  
cont. 2.2

800,000 GPD divided by 171,072 GPD (described as existing flow) equals a design flow that is 4.76 times the existing flow, which means the proposed wastewater collection and treatment facilities are nearly five times greater than what is necessary to improve existing water quality conditions.

Additionally, the Town of Southampton is seeking use of the CPFWQF (\$2,500,000.00) for the planning, design, and construction of the Riverside Sewer District project. It is understood restrictions of CPFWQF include prohibition for projects that accommodate additional development. How is it possible to separate the funding to improve water quality and use of CPFWQF based on the existing flows, when the wastewater of new redevelopment is also accommodated by the Proposed Action?

JS1w-15  
Sec. 2.12

Comment I.23.24.2

Proposed Action: CPFWQF Application and request for funding.

There are several statements among the documents reviewed and as referenced in the SDGEIS that need clarification. Several examples are cited below:

CPFWQF Application (page 5): prepared by the Town of Southampton:

Section 3e Application Form Request:

“If a project is a Sewage Treatment Plant (STP) or cluster treatment system: Fund allocation request is based on cost for reduction of pre-existing conditions and not for purpose of accommodating new density (describe pre-existing density and associated flow (gallons per day) and total projected nitrogen reduction in narrative). Include detailed information on how many homes the system would treat as well as potential for formation of a Sewer District, if required by Suffolk County Health Department or Town Law.”

JS1w-16  
Sec. 2.2

The Applicant’s Response to Section 3e:

“The proposed project is for engineering design services for the Riverside sewer system, which will remove existing development from onsite systems and convey effluent to the sewage treatment plant. Calculations relative to density and nitrogen removal will be developed as part of the Map and Plan.”

JS1w-17  
Sec. 2.2

The Section 3e response should describe the project as two-phased, consisting of the collection, conveyance system and STP facility designed to accommodate a flow of 400,000 GPD in Phase I and an additional 400,000 GPD in Phase 2 (a total of 800,000 GPD) as well as clear descriptions of existing and future development with respective wastewater volumes generated by each.

JS1w-18  
Sec. 2.2

It is noteworthy, the Phase I capacity is significantly greater than the existing flow estimated by Nelson Pope Voorhis (NPV) generated by conventional septic systems/cesspools and located within the Phase I sewer service area. According to NPV, the consultant reported the existing conditions wastewater flow is 94,132 GPD- (page 4- Town of Southampton Department of Land Management Riverside Sewer System Planning & Design -Year I: Attachment 1 Supplemental Narratives - CPFWQF).”

JS1w-19  
Sec. 2.2

Other reports (CWSRF and the SDGEIS) stated the proposed Riverside District wastewater flow generated by existing conditions was estimated at 171,072 GPD.

JS1w-20  
Sec. 2.2

Which of the existing conditions regarding the wastewater flow is accurate; is it 94,132 GPD or 171,072 GPD? If one flow (171,072 GPD) is a “design flow” or TDS flow based on zoning and future land use plans (facilities not constructed) and the 94,132 GPD figure is an estimated wastewater flow irrespective of a design standard or future build out, this must be clarified. For either explanation, the proposed action is significantly greater than what existing conditions warrant. Furthermore, each of these existing conditions wastewater volumes exclude the existing wastewater generated by Suffolk County’s facilities. Why?

Does the wastewater volume presented in Phase 1 (existing flow of 94,132 GPD) suggest that the Phase 2 existing conditions flow is: 76,940 GPD; based on the overall district’s existing volume of wastewater estimated at 171,072 GPD, minus the Phase 1 volume of 94,132 GPD; which yields the 76,940 GPD?

JS1w-21  
Sec. 2.2

Does this suggest that Phase 2, which is designed to manage an additional 400,000 GPD, is then five-times greater than the collection and treatment system needed to accommodate the 76,940 GPD generated by existing conditions within Phase 2?

JS1w-22  
Sec. 2.2

Can the Town of Southampton explain how the proposed Riverside Sewer District financing can be supported by any use of its CPFWQF, because it appears that Phase 1 and Phase 2 cannot be considered separated by the prerequisite planning, engineering design and construction of infrastructure of the entire proposed District; and how the quantity of wastewater generated by future new development is not disproportionate to the existing conditions; and what is the existing conditions wastewater volume, with some identification of built, non-built and Suffolk County contributions of this total volume.

JS1w-23  
Sec. 2.12

Comment 1.23.24.3

**Proposed Action:** estimated nitrogen reduction to the Peconic Estuary and wastewater volumes.

As stated in Comment 1.23.24.2 documents referenced in the DSGEIS regarding the existing wastewater flow generated within the proposed District are at best confusing. This volume of existing unsewered wastewater is directly proportional to nitrogen impact to groundwater outflow to the Peconic Estuary. The nitrogen loads generated by existing conditions and impact to ground and surface water resources are the cornerstones for the Proposed Action.

JS1w-24  
Sec. 2.3

In describing the existing conditions, NPV estimated “existing conditions generate a discharge of 14,326.25 pounds of nitrogen per year, which indicates Phase 1 of the proposed action would reduce nitrogen loads by 4,924 pound per year with the Riverside redevelopment plan enacted.”

NPV further stated, “Estimated nitrogen discharge from the proposed Phase 1 STP, which in accordance with Riverside redevelopment plans is based on flow of 308,829 GPD at a maximum of 10 mg/L, or 25.76 lbs./day. This equates to 9,402 lbs./year.” [sic. 9,402 pounds of nitrogen per year].

In another referenced publication, The Southampton WQIP-Proposal Summary Sheet 2022 ([www.southamptonny.gov/DocumentCenter/View/1](http://www.southamptonny.gov/DocumentCenter/View/1)), it was stated, "It is estimated that approximately 5,976 lbs. of nitrogen are added to the Peconic River every year by existing conventional septic systems within the Riverside area that are proposed to be part of the sewer district."

JS1w-24  
cont.  
Sec. 2.3

This quantity (5,976 lbs. N/year) matches the statement made in the Nelson & Pope page 29-*Riverside STP CWSRF Report, in Section 2.3 Existing Facilities & Present Conditions*, "From the Center for Watershed Protection's Watershed Treatment Model (WTM) performed for the DGEIS by NP&V, the existing area contributes approximately 5,976 lbs./year of nitrogen to the Peconic River."

Can the Town of Southampton explain how the number of pounds of nitrogen generated were calculated; what existing conditions flow volume was used; why the annual amount of nitrogen discharged to the Estuary was estimated by NPV to be 14,326.25 pounds in one study, and the Town's Summary Sheet and the CWSRF Report listed an annual amount of 5,976 pounds? Which of these estimates of annual nitrogen discharged by the existing conditions is correct? Are these estimates only for discharge to the Peconic River and Estuary and if so, can this be clarified?

#### Comments 1.23.24.4

**Proposed Action: proximity to the Suffolk County Government Center and Correctional Facility and omission of a cost beneficial analysis.**

The Suffolk County facilities should be identified and included in the proposed Map and Plan for the proposed Riverside Sewer District. Once established, the proposed Riverside Sewer District will be the nearest location to a treatment plant where the County facilities can connect via the County's existing sanitary infrastructure. This is supported by Southampton's engineering response to the Arcadis comments on the proposed sewer system.

JS1w-25  
Sec. 2.2

According to the Town of Southampton's "Request for Qualifications for Professional Municipal Sewer Engineering Services for the Riverside Sewer Improvement Project" (RFQ) Exhibit N-*Response Letter to Value Engineering Study (June 16, 2023, Nelson & Pope)*:

Arcadis Comment to Utilize Riverhead Treatment Plant (TP-7 & TP-10)

"Expand and confirm biosolids management at Riverhead WRRF and Expansion of Riverhead WRRF and Riverside flow diversion:"

Nelson & Pope Response to TP-7 & TP-10

Utilization of Existing Riverhead STP-

"For any development that is exploring the possibility of connecting to an existing STP, it would be most beneficial to connect to the closest STP to minimize construction and operational costs."

The above comment and response support recommendations for including County facilities in the Riverside Sewer District.

The proposed Riverside Sewer District and WWTP, is the closest system to the County facilities, not the Riverhead STP. Considering the proposed Riverside Sewer District consists of more than 12 miles of collection pipes, four (4) pump stations and a treatment plant designed for processing 800,000 GPD, adding the Suffolk County Center and County Correctional Facility is reasonable.

JSIw-26  
Sec. 2.6

The County facilities are located just west of Little River, a tributary of the Peconic River. Based on the proposed Riverside Sewer District Map, Little River separates the County facilities from the western boundary of the District; or about 300-feet as the crow flies.

West of the County's facilities there are no other existing developments generating significant wastewater that must be considered in the Riverside Sewer District Boundary. The nearest major residential development is 2.4 miles away.

In summary, the omission of nearly 45-acres of County facilities for inclusion in the proposed Riverside Sewer District Boundary Map and its attendant SDGEIS, on its surface is arbitrary.

Clearly these facilities are within the Riverside hamlet and generate sufficient wastewater flow that could be managed by the proposed \$35 million of infrastructure needed for the Riverside Sewer District project. There is a relatively short distance between the existing Suffolk County owned pump station at Nugent Drive and the proposed sewer District boundary, which terminates at Little River. Suffolk County could realize a reduction in wastewater disposal sewer fees, when compared to charges experienced as an "out of district" user of the Riverhead Sewer District, with an insignificant construction cost needed to connect to the proposed Riverside District. Including the County facilities in the proposed boundary at the inception of forming the Riverside Sewer District-Map and Plan approval process, avoids additional engineering and legal fees to someday add this area by modification and submission of yet another Map and Plan. Because Southampton has to date not established the final boundary, the time to revise the proposed Map and Plan is now.

JSIw-27  
Sec. 2.2

Recognizing the proposed design of the Riverside STP is significantly greater than what the existing wastewater base flow requires, and by design, has flexibility for low cost and operational future expansion, it is strongly recommended the inclusion of County facilities be added.

JSIw-28  
Sec. 2.2

On behalf of the Riverhead Town Board, Commissioners of the Riverhead Sewer District, thank you for your continued cooperation. Please address the comments to the referenced SDGEIS and proposed Riverside Sewer District Map and Plan.

Respectfully submitted,  
*Jeffrey L. Seeman*  
Jeffrey Seeman, CEP  
Certified Environmental Professional



ADOPTED

PLANNING BOARD RESOLUTION (ID # 45386)

DOC ID: 45386

## Riverside Sewage Treatment Plant SDGEIS

**WHEREAS**, the Planning Board is in receipt of the Supplemental Draft Generic Environmental Impact Statement (SDGEIS) for the Riverside Sewage Treatment Plant; and

**WHEREAS**, the Planning Board has reviewed the SDGEIS and discussed the plan at their January 11, 2024 and January 25, 2024 meetings;

**WHEREAS**, the Planning Board supports the formation of a Riverside Sewer District, and construction of an associated sewage treatment plant, in order to revitalize the hamlet of Riverside, with the following comments:

SPB-1  
Sec.  
2.14

- The Planning Board supports the preferred alternative that utilizes leaching pools, as the use of injection wells does not comply with ECL §15-1528;

SPB-2  
Sec. 2.3

- The Planning Board recommends selection of treatment technology that provides the highest levels of treatment and adaptability;

SPB-3  
Sec. 2.6

- The Planning Board recommends that the beneficial reuse of treated graywater needs to be explored as a future initiative;

SPB-4  
Sec. 2.6

- The Planning Board recommends the installation of solar panels atop the proposed sewage treatment plant building, in order to offset energy consumption at the site, consistent with the recommendations of the Climate Action Plan;

SPB-5  
Sec. 2.2  
& 2.7

- The Planning Board recommends creation of a grant program to help offset the annual operation and maintenance costs for low to moderate income households; and

SPB-6  
Sec. 2.6

- The Planning Board recommends that the Town Board engage in community outreach and education regarding the proposed sewage treatment plant and district formation; now, therefore

SPB-7  
Sec. 2.1  
& 2.3

**BE IT RESOLVED**, that the Planning Board supports the proposed establishment of a sewer district, as well as the construction of the sewage treatment plant and associated collection and conveyance system consistent with the recommendations outlined above.

SPB-8  
Sec. 2.14



# TOWN OF RIVERHEAD

TIMOTHY C. HUBBARD, TOWN SUPERVISOR

4 West Second St., Riverhead, NY 11901  
Tel: (631) 727-3200  
[www.townofriverheadny.gov](http://www.townofriverheadny.gov)

January 26, 2024

Southampton Town Supervisor and Town Board Members

c/o:

Sundy A. Schermeyer

Town Clerk

Town of Southampton

116 Hampton Road

Southampton, NY 11968

Dear Supervisor Moore and Board Members,

Thank you for the opportunity to speak at your January 23, 2024 public hearing on Southampton's DGEIS for the siting and construction of a Riverside Community Sewage Treatment Plant (STP).

Initially, let me state that Riverhead is very happy that Southampton is building a sewage treatment plant in Riverside. It will protect the Peconic Estuary to benefit the entire east end region and allow for the revitalization of Riverside.

Thw-1  
Sec. 2.14

As you know, Riverside is deeply connected to the Town of Riverhead. We provide its residents with education through the Riverhead Central School District, a library, fire protection, public transportation, postal services, hospital and medical services, kids' recreation, parks and more.... and we even share a zip code. The communities effectively function as one unit.

THw-2  
Sec. 2.9

The communities also share important demographics – they are both Areas of Persistent Poverty, are Historically Disadvantaged and are Environmental Justice areas. The residents of Riverside are considered "very highly segregated" based on color and Downtown Riverhead is "highly segregated" in the same category. Accordingly, we must be vigilant to ensure that any redevelopment in Riverside and Riverhead does not exacerbate this situation nor overwhelm Riverhead's already limited resources.

THw-3  
Sec. 2.9

In downtown Riverhead, we addressed this problem by providing housing of all types for all people. We have included affordable rentals, market rate rentals, work force rentals, condos and a fair stock of affordable single-family homes. There is also a healthy dose of commercial development in our downtown plans, including hotels. We continue to strive to make Riverhead a place for everyone and we are on a firm path to revitalization in downtown Riverhead that will provide economic development, diversity on all levels and removal of barriers for all. We believe that Riverside should be redeveloped using the same methodology.

THw-4  
Sec. 2.8



In our opinion, the revitalization plan for Riverside *must* be updated to include up-to-date demographical information and modeling. Simply put, a revitalization and redevelopment plan of this scale relying upon ten-year-old data must not be permitted to move forward. We have a once in a lifetime opportunity here to get it right by revisiting the plan using the current data and taking into consideration the current stakeholders. To that end, the Town of Riverhead requests that an update to the Riverside Revitalization Activation Plan be performed and in fact, and even propose an intermunicipal effort to review current market and demographics with an eye toward incorporating more commercial development, home ownership opportunities with small condos, luxury housing, market rate rentals and senior housing into the plan. A mindful mix of development will provide more walkable employment and ensure that the Riverside and Riverhead hamlets get what they deserve – a vibrant, diverse and economically robust community. Riverhead is willing to partner in funding this study.

THw-5  
Sec.  
2.7

Additionally, and as was also outlined by our Environmental Consultant Jeff Seeman, the Town is requesting that the district boundaries of the new Riverside sewer district be drawn to include the Suffolk County Correctional Facility and County Center, just 1000 feet west of the plant's proposed location. The Town has been serving these facilities by contract for many years as they are not within the Riverhead Sewer District. This would expand the Riverhead Sewer District's capacity such that Riverhead can expand its sewer along West Main Street and we can – like Southampton - remove existing homes and businesses located directly on the river from private septic systems.

THw-6  
Sec.2.2

Furthermore, connecting to these existing county facilities would provide immediate revenue to the new Riverside STP to offset operational costs until other existing properties are connected. Moreover, additional capacity will allow Riverhead to enhance its Transfer of Development Rights program so that we can preserve vulnerable farmland. We have already preserved over 2000 acres through CPF but, unlike other east end towns, Riverhead will not have additional CPF revenue until 2030. That means that we are very limited in the tools we can use to preserve the 7000 remaining acres of prime agricultural soils - which lands are under serious development pressure. Our soon to be adopted Comprehensive Master Plan is recommending that we expand the use of our TDR program to encourage more farmland preservation using private dollars. Sewer capacity is the key to the success of this program. If we can increase density in commercial areas like Route 58, that already have sewers, we can ramp up farmland preservation. Recapturing the sewer capacity currently used by the County Center and Correctional Facility is critical to the success of this program.

THw-7  
Sec.  
2.2



Preservation of agriculture is a regional goal and as you know, is the primary purpose of the CPF. Unfortunately, the way the program is currently structured, poorer communities, like Riverhead, are left without the ability to preserve our agricultural heritage, agricultural economy and open spaces the way the other wealthier east end towns have been able to. The result of this is environmental injustice.

THw-8  
Sec.  
2.2

While changes to your current plan could take a bit more work to implement, it is important to remember that public hearings are designed to generate public comment on important issues and often create a better result. Rest assured that we will work with you in any way possible to ensure that there is minimal, if any, delay in moving this important project forward.

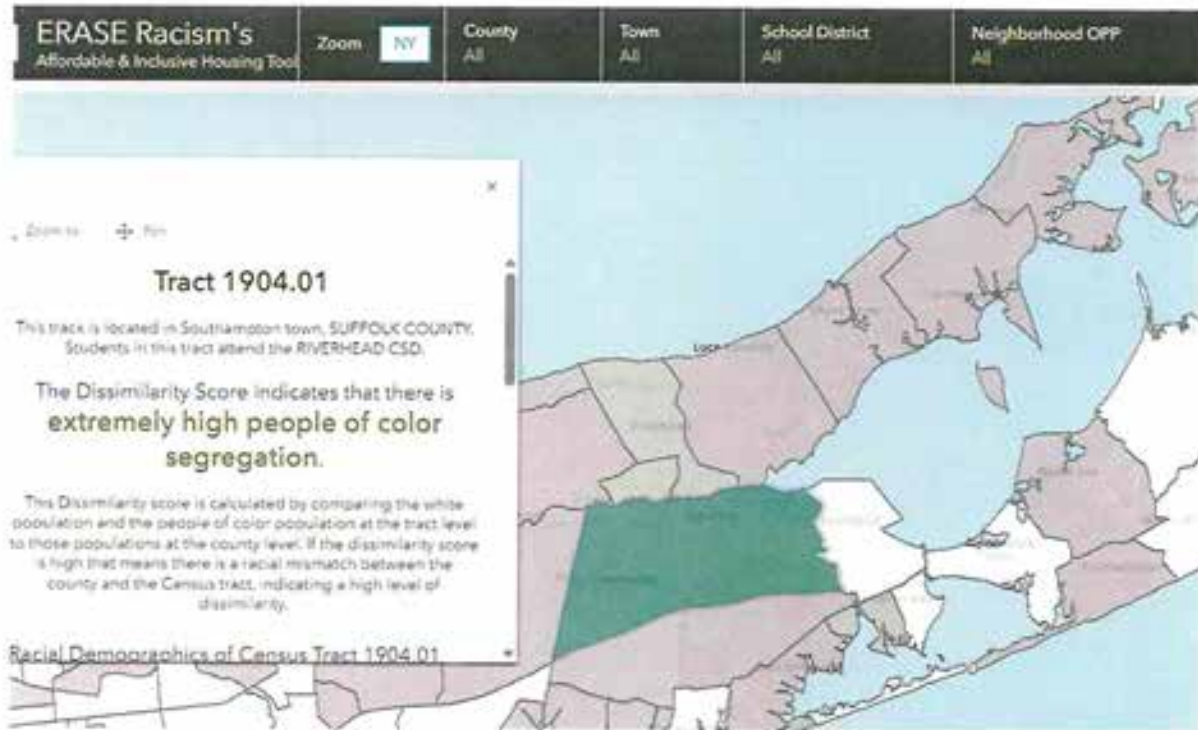
THw-9  
Sec.  
2.1 &  
2.3

Thank you again for the opportunity to discuss these important matters. I look forward to working with all of you toward the betterment of our respective communities.

Very truly yours,

Timothy C. Hubbard  
Supervisor

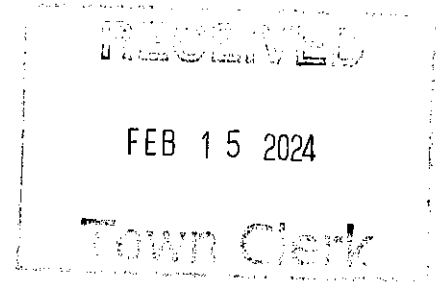
Cc: Alicka Ampry-Samuel, Regional Administrator  
Office of the Regional Administrator, HUD  
Kevin Law, Chairman, NYS Empire State Development  
RuthAnne Visnauskas, Commission and CEO of NYS Homes and Community Renewal  
Cara Longworth, Regional Director, NYS Empire State Development  
Sara Lansdale, Commissioner – Suffolk County Department of Planning and  
Environmental Erace Racism



TB Meeting 2/15/24  
P.H.# 3 & 4

Not distributed - no copies provided

Jeffrey L. Seeman, CEP  
Certified Environmental Professional  
PO Box 130  
East Quogue, NY 11942  
631.872.9116  
[Jeffrey.seeman@icloud.com](mailto:Jeffrey.seeman@icloud.com)



February 15, 2024

Town of Southampton Town Board  
116 Hampton Road  
Southampton, NY 11968  
Attention: Janice Scherer, Town Planning & Development Administrator

RE: Public Hearing Comments:  
Proposed Riverside Sewer District Map & Plan and SDGEIS Riverside Sewer District

Dear Ms. Scherer,

My name is Jeffrey Seeman, and I am an environmental consultant representing the Town of Riverhead Town Board as the Commissioners of the Riverhead Sewer District.

The Town Board has engaged my professional services to review the SDGEIS for the Riverside Sewer District and the proposed Riverside Sewer District Map & Plan, which outlines the District boundary. Pursuant to the SEQRA comment period, I provided written comments dated December 12, 2023, and January 23, 2024, and together with Riverhead Town representatives appeared before this Board during the SEQRA SDGEIS Public Hearings held on those dates to offer summary statements.

Because there is no opportunity for Riverhead to comment on the content of the Supplemental Final GEIS or participate in its preparation, Riverhead will have little opportunity to comment further, except as a voting member of the Long Island Central Pine Barrens Commission. As all previous statements are part of the SEQRA record, we request the responses provided through preparation of the Supplemental Final GEIS be thorough, reasonable, and defensible.

JS2w-1  
Sec.  
2.11

In summary the Riverhead Town Board has requested the sanitary flow generated by the Suffolk County Center, the Courts and the Correctional Facilities be included in the proposed Riverside Sewer District Map & Plan. The estimated flow of 100,000 GPD, which is outside the Riverhead Sewer District but collected and treated by Riverhead should, as recommended by Nelson & Pope, be connected to the nearest Sewage Treatment Plant, which when constructed will be in Riverside.

JS2w-2  
Sec. 2.2

The County owned and maintained sanitary pump station at Nugent Drive (currently connected to the Riverhead Sewer District) is approximately 1000 liner feet from the proposed Riverside Sewer District boundary. The nearest point for this connection is east of the Traffic Circle, and the necessary Riverside infrastructure will be accessible during Phase I's construction.

JS2w-3  
Sec.  
2.2

The relief from the County's sanitary flow, which Riverhead has served by-out-of-district agreements since the 1960s, will provide Riverhead the much-needed capacity to direct development to locations served by the Riverhead Sewer District and connect unsewered units located along the Peconic River Corridor that are degrading the River's water quality. It makes no environmental sense to sewer the downstream Riverside community, unless Riverhead can provide sewer connections at locations upstream on its side of the River.

JS2w-4  
Sec.  
2.2

Additionally, the Town's Comprehensive Plan Update proposes land preservation under a TDR program for parcels located north of Sound Avenue, currently zoned for residential use, be targeted as a Sending Area. The proposed Receiving Area is recommended to fall within current or easily expanded sewer areas. Simply stated, Riverhead needs capacity to serve the Town's preservation and water quality improvement needs and can no longer accommodate out-of-the-district users.

JS2w-5  
Sec.  
2.2

A review of Southampton's Positive Findings Statement prepared for *Riverside BOA Step II Nomination Study, Riverside Revitalization Action Plan and Zoning Map and Code Amendments, dated December 22, 2015*, under section 2.2 *Water Resources, Finding 2*, stated, "The Proposed Action will not have any significant adverse impacts on water resources, including surface waters, wetlands, and groundwater."

"Nitrogen loading to groundwater shall not exceed the allowable loads based on existing conditions and permitted loads per Suffolk County Sanitary Code for vacant and subdivisible lands within the Study Area. This limits the Theoretical Development Scenario residential use to 1,167 units with a flow of 150 gpd/unit (or a limit of 175,050 gpd of residential use connected to a sewage treatment plant) until additional steps are taken to ensure nitrogen loads would not exceed that which would be permitted under existing conditions. These could be achieved in several ways, including sewerage of existing unsewered areas in the Study Area, reduction in the number of residential units built under the Theoretical Development Scenario, treatment and discharge of wastewater in deep recharge areas outside of the Study Area, or advanced nitrogen removal technologies."

JS2w-6  
Sec.  
2.1

"The need for additional water resources investigations and associated mitigation measures are indicated in the Findings Statement and will be further enhanced or augmented as determined by the Planning Board during site plan and SEQRA reviews for site-and-project-specific plans."

The SDGEIS prepared for the proposed Riverside Sewer District did not assess the potential impacts of a reduced density alternative as identified in the December 22, 2015 Findings Statement. When considering the Growth Inducing Impacts of the proposed Riverside Sewer System and Treatment Plant, the SDGEIS should assess how a reduction in residential units under the Theoretical Development Scenario (TDS) (*Draft GEIS: Riverside BOA, Revitalization Action Plan and Zoning Amendments, Oct. 2015 Table 7- Theoretical Development Scenarios Zones RO-1 through RO-6*, which theoretically identified development of 2,267 residential dwelling units) would reduce nitrogen impacts on: water quality, water use, the Riverhead Central School District, other services provided by Riverhead (library, fire protection, public transportation, postal, hospital and medical, and children's recreation) and how expanding the Riverside Sewer District and

JS2w-7  
Sec.  
2.3



accepting the wastewater flow from the County facilities could support the proposed District's revenues without the additional impacts typically generated by thousands of residential units.

↑ JS2w-7  
cont..  
Sec.  
2.3

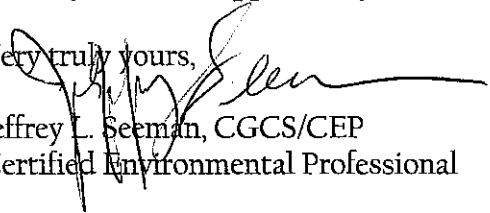
If the Lead Agency is concerned over the proposed District's capacity to manage the County's wastewater flow, then it is recommended the Lead Agency through its SFGEIS preparation, analyze a Reduced Theoretical Density Scenario as an Alternative, perhaps including a mix of uses other than residential that will reduce the sanitary flow generated by the TDS by 100,000 GPD.

JS2w-8  
Sec.  
2.1

This approach would be consistent with the Positive Findings Statement prepared for the RRAP, which identified a reduction in residential development as an approach to reducing nitrogen impacts, satisfy the "hard look" required by SEQRA and provide each Town a second look at the impacts potentially generated by the RRAP TDS and zoning.

Thank you for the opportunity to offer additional comments.

Very truly yours,

  
Jeffrey L. Seeman, CGCS/CEP  
Certified Environmental Professional



# TOWN OF RIVERHEAD

TIMOTHY C. HUBBARD, TOWN SUPERVISOR

4 West Second St., Riverhead, NY 11901

Tel: (631) 727-3200

[www.townofriverheadny.gov](http://www.townofriverheadny.gov)

2024 FEB 26 P 2:40

TOWN CLERK'S OFFICE  
TOWN OF SOUTHAMPTON

February 20, 2024

Sundy A. Schermeyer  
Town Clerk  
Town of Southampton  
116 Hampton Road  
Southampton, NY 11968

Re: Riverside Community Sewage Treatment Plant  
Proposed map and plan for the Riverside Community Sewage Treatment District.

Dear Town Clerk Schermeyer:

I as Supervisor of the Town of Riverhead, together with unanimous support of members of the Town Board, submit the following additional official comments to the Town of Southampton's Supplemental DGEIS for the Riverside Community Sewage Treatment Plant. The comments are also submitted to address the proposed Map and Plan for the Riverside Community Sewage Treatment District and as such, we respectfully request that same be made as part of the official record.

The Town has previously stated in its official written comments and in our in-person comments at three previous public hearings, Southampton's efforts to create a sewage treatment plant for Riverside to protect the Peconic Estuary and to revitalize Riverside are laudable goals for the Town of Southampton.

TH2w-1  
Sec. 2.5

As the Town learns more about the proposed project and its lack of inclusion of the Suffolk County Center and the Suffolk County Correctional Facility in the proposed Map and Plan for the Riverside Community Sewage Treatment District (Riverside STP), the Town has grave concern for the direct and negative impact upon the Town of Riverhead. It is imperative that the Town of Southampton include the Suffolk County Center as this facility is located in Riverside and within Southampton Town. As was stated by the Town's environmental consultant, Jeff Seeman, allowing Riverhead to recapture the sewage flow from the County facilities locate outside of Riverhead Town would allow the Town to more fully utilize the Town of Riverhead's Transfer of Development rights program (TDR) – a critical and essential tool for our Town to achieve our land preservation goals. Furthermore, and of benefit to the residents of Riverside, it would provide an immediate and consistent source of revenue and needed sewage flows to this newly created taxing district.

TH2w-2  
Sec. 2.2

Specifically, the Town of Riverhead has approximately 7000 acres of prime agricultural land remaining for preservation however, our Town not have the Community Preservation Fund (CPF) funding available until 2030 to use for pursuit through CPF and it concomitant Purchase of Development Rights program. These 7000 acres are under significant development pressure and may ultimately be lost forever if we do not have a robust and effective TDR program. In order to accomplish these goals, we must have receiving areas that can accept additional density. As you well know, sewers are the key to creating this needed additional density. One area that our draft Comprehensive Plan is recommending for this increased density is along West Main Street.

TH2w-3  
Sec. 2.2



This blighted and depressed riverfront area, the missing connection between our Route 58 sewer system and our Downtown Sewer system, could be revitalized through the increase of residential and commercial density that would be permitted by sewers. The capacity currently utilized by the County Center and Suffolk County Correctional Facility would allow this revitalization to happen without increasing the capacity of our STP. The sewerage of Riverside/Southampton would also eliminate a significant amount of nitrogen from entering the Peconic Estuary upstream from the proposed Riverside STP. The inclusion of the County Center and Suffolk County Correctional Facility in the Riverside STP, would permit both Towns, Riverside STP and Riverhead Sewer District, to capture almost all of the nitrogen flows that are now going directly into the Peconic River and permit each Town to continue its revitalization efforts. Based upon the potential to afford farmland preservation, as well as the improvement of the health of the Peconic River and revitalization of the West Main Street area, we, the Town of Riverhead, strenuously urge that the proposed Riverside STP Map and Plan be immediately revised and expanded to include the Suffolk County Center and Correctional Facility.

TH2w-4  
Sec. 2.2

With respect to the Riverside Revitalization Action Plan (RRAP), more than ten years have passed since it was initiated and we are all aware that the demographics in the Riverside and Downtown Riverhead area have changed dramatically. In order to avoid the over saturation and reduce segregation of these areas with affordable housing, it is imperative that the Towns rethink the composition of the uses and density in the redevelopment area mindful of Riverhead's work in the Downtown area and the changing demographics. The Town of Riverhead looks forward to working with Southampton in revisiting the RRAP plan. We have the potential to rethink this opportunity to dovetail with Riverhead's downtown plans and to address the current conditions and demographics in Riverside. Riverside residents deserve a true live, work and play community.

TH2w-5  
Sec. 2.2  
TH2w-6  
Sec. 2.1  
& 2.8

Lastly, Riverhead has questions relating to the Riverside master developer selected by Southampton including; understanding what their role is, what the Town's contractual relationship is, whether they own or control any properties, how far into the future does that agreement reach and whether it would impact Southampton's ability to make necessary changes due to new circumstances.

TH2w-7  
Sec. 2.13

Once again, thank you for providing us with the opportunity to participate in these important projects.

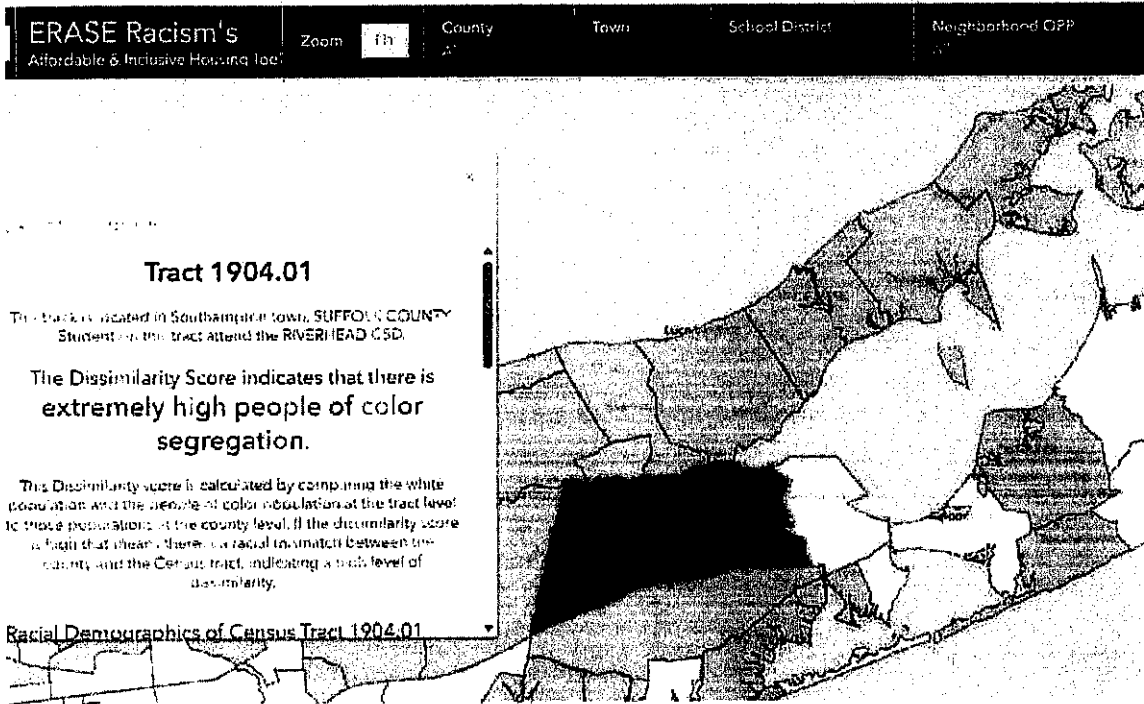
Very truly yours,

Timothy C. Hubbard  
Supervisor

- cc: Alicka Ampry-Samuel, Regional Administrator
- Office of the Regional Administrator, US Dept. of Housing and Urban Development
- Kevin Law, Chairman, NYS Empire State Development
- RuthAnne Visnauskas, Commission and CEO of NYS Homes and Community Renewal
- Cara Longworth, Regional Director, NYS Empire State Development

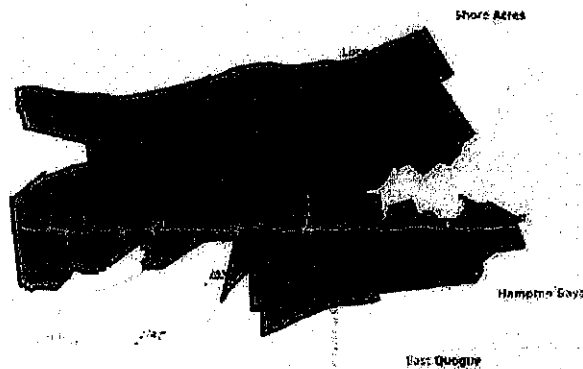


Sarah Lansdale, Commissioner — Suffolk County Department of Planning and Environment



page 4

Educational Opportunity Index



See

COUNTY OF SUFFOLK



EDWARD P. ROMAINE  
SUFFOLK COUNTY EXECUTIVE

DEPARTMENT OF PUBLIC WORKS

CHARLES J. BARTHA, P.E.  
COMMISSIONER

MICHAEL J. MONAGHAN, P.E.  
CHIEF DEPUTY COMMISSIONER

DARNELL TYSON, P.E.  
DEPUTY COMMISSIONER

LESLIE A. MITCHEL  
DEPUTY COMMISSIONER

February 20, 2024

RECEIVED

FEB 26 2024

NELSON + POPE

Southampton Town Board  
Attn: Sundy A. Schermeyer, Town Clerk  
116 Hampton Road  
Southampton, NY 11968

Re: DPW #104-2017 – Riverside Sewer District  
CR 104, Quogue-Riverhead Road - SCTM #0900-141.00-01.00-009.014, 009.017, et al.

Ms. Schermeyer:

This Department has reviewed the above-referenced site plan and offers the following comments:

A permit from this Department will be required pursuant to Section 136 of the Highway Law for the proposed access and any improvements this Department deems necessary along the Country right-of-way.

SCDPW-1  
Sec. 2.10

Before a permit is issued by this Department for these improvements, documentation pursuant to Section 239F of the New York State General Municipal Law must be forwarded to us from the Town Building Department for our review and comments.

SCDPW-2  
Sec. 2.10

Proposed pumping stations one (1) and three (3) will require permits from this office.

SCDPW-3  
Sec. 2.10

If you have any questions or concerns regarding this matter, kindly contact this office at (631) 852-4100.

Very truly yours,

Craig Lovallo  
Assistant Director of Traffic and Permits

CL:KD:shd

Cc: Janice Scherer, Town of Southampton, Department of Land Management  
Nelson and Pope

SUFFOLK COUNTY IS AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

335 YAPHANK AVENUE

YAPHANK, N.Y. 11980

(631) 852-4081  
FAX (631) 852-4079

February 21, 2024

Town Board of the Town of Southampton  
Via Email

Re: Written Submission for Public Hearing related to the SGEIS for the Siting and Construction of a Community Sewage Treatment Plant (STP) and associated Collection and Conveyance System in the Hamlet of Riverside

Dear Town Board members,

These comments are in addition to and in conjunction with oral comments entered into the record for the above-referenced public hearing on Thursday, February 15, 2024.

I recognize that the current Town Board is now responsible for critical decisions on projects in progress from the Schneiderman Administration. It is my assertion that you can only make those critical decisions with complete and accurate information from your advisors. It may take time to unravel and understand what has transpired.

GLW - 1  
Sec. 2.1

The February 15, 2024 public hearing was the 3<sup>rd</sup> of three public hearings related to the Supplemental Generic Environmental Impact Statement (SGEIS) for the siting and construction of a Sewage Treatment Plant (STP) for the redevelopment of Riverside.

I listened to several Town of Riverhead officials voice concerns related to the accuracy and completeness of the information provided to the Southampton Town Board from its land management staff and consultants at the prior two public hearings. As a taxpayer, it raised significant concern for this tax-funded project. As a trusted advisor in my "former life", I was embarrassed for the Town Board. From my perspective, the advisors failed the Town Board and the taxpayers. To the extent that this project is funded by the county or state, every taxpayer in the Town of Riverhead is funding this project as well as every taxpayer in every municipality in the county and state. The Town Board of the Town of Southampton is accountable and responsible to every taxpayer in every municipality in the county and state.

GLW-2  
Sec.2.1

As the litigant in Lombardi v the Town of Southampton, I provide the following comments for the public record.

GLW-3  
Sec. 2.1

First, the Lead Agency in a SEQRA process is responsible for the accuracy and completeness of the FEIS. That cannot be delegated. The NYS Department of Environmental Conservation SEQRA Handbook, Fourth Edition, 2020 at Chapter 5F Q & A 9 elaborates on the regulations under SEQRA:

GLW-3  
cont.  
Sec.2.1

“Who is responsible for the preparation of the final EIS?”

The lead agency is responsible for the adequacy and accuracy of the final EIS. ... The lead agency may also consult with other involved agencies, or with outside consultants, but this in no way reduces the responsibility of the lead agency for the final product (emphasis added).”

Pursuant to *Jackson v New York State Urban Dev. Corp* 34 N.Y.2d 222, 313 N.E.2d 321, 356 N.Y.S.2d 833), the agency is required to comply with the applicable law, identify the relevant areas of environmental concern, take a “hard look” at them and made a reasoned elaboration of the basis for its determinations.

GLW-4  
Sec.2.1

“When an agency fails or refuses to undertake necessary analyses, improperly defers or delays a full and complete consideration of relevant areas of environmental concern, or does not support its conclusions with rationally-based assumptions and studies, the State Environmental Quality Review Act (SEQRA) findings statement approving the final environmental impact statement (FEIS) must be vacated as arbitrary and irrational.” (*McKinney's ECL § 8-0101 et seq.*)

At the public hearing of February 15, 2024, I presented the Town Board with the 9-page list of the documents presented to the Supreme Court by the Town Board in its answer to my Article 78 Petition to annul the Hampton Bays Downtown Overlay District (HBDOD). This list represented several boxes of binders submitted to the Court in support of the Town Board decision. The documents also included expert testimony contained in affidavits from Carrie O’Farrell (NPV) and Janice Scherer, the same advisors on the above-mentioned project.

GLW-5  
Sec.2.1

However, as this Town Board is fully aware, I prevailed in my Petition notwithstanding the boxes of documentation and expert affidavits. I pointed the Court to the following case:

*In the Matter of County of Orange v. Village of Kiryas Joel 11 Misc.3d 1056(A), 815 N.Y.S.2d 494 (Table), 2005 WL 3802969 (N.Y.Sup.), 2005 N.Y. Slip Op. 52270(U) (aff. 44 A.D.3d 765)*

“One cannot presume that the requisite “hard look” was taken based on the thickness of the DEIS or because the consultants were highly regarded in their fields.”

Here, the Court decided:

“...in certain substantive areas enumerated herein, the FEIS does not take a hard look at specific aspects of the project. Based on the foregoing, the Statement of Findings adopted by the Village on July 8, 2004, are hereby vacated.”

I also provided the Town Board at the public hearing on February 15, 2024 with a letter addressed to Town Board from Ray D’Angelo as the Chairperson of the Hampton Bays Citizens Advisory Committee (HBCAC) dated January 14, 2020. This letter was presented in person at the January 14, 2020 Town Board meeting in anticipation of the Town Board approving the Final SGEIS for the HBDOD. The letter urged the Town Board to delay approval until such time that the NYS DEC could complete their investigation of the NYS Superfund site located within the HBDOD boundaries. This letter was listed as #48 on the Town Board’s list of records submitted to the Court with its Answer to my Petition.

Just as in the case of the above-referenced project, the HBDOD process spanned several years. However, this specific environmental issue was identified mid-process and was not fully addressed as the investigation was not complete at the time of the approval for the Final SGEIS. There was fatigue regarding the HBDOD by the Town Board. Supervisor Schneiderman, for all intents and purposes, dismissed this issue and stated, (I am paraphrasing), “people want this (the HBDOD) done”. The Town Board approved the Final SGEIs and subsequently approved the HBDOD.

Ironically, for all intents and purposes, the Supreme Court agreed with Mr. D’Angelo and the HBCAC and annulled the HBDOD on the grounds that the NYS DEC had not completed their investigation. There was significant case law on this subject matter.

GLw-5  
cont.  
Sec.2.1

GLw-6  
Sec.2.1

I offer the above-stated comments as a "cautionary tale" as the litigant in Lombardi v. Town of Southampton to the Town Board. The Town Board cannot delegate or defer its responsibility for the completeness or accuracy of the environmental review no matter how many years have lapsed since this process started or who prepared the analyses and/or the magnitude of the analyses.

↑  
GLW-6  
cont.  
Sec. 2.1

If you have questions or wish to discuss further, please do not hesitate to contact me.

Respectfully submitted,



Gayle Lombardi  
Hampton Bays

cc: Sundy Schermeyer, Town Clerk  
for the public hearing record

Town Board meeting 2/15/24  
P.H.'s #3 & #4

38

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

RECEIVED  
FEB 15 2024  
Town Clerk

-----X  
GAYLE LOMBARDI,

Petitioner,

Index No. 01883/2020

For a Judgment Pursuant to Article 78  
of the Civil Practice Law and Rules

Hon. Robert F. Quinlan

-against-

TOWN BOARD OF THE TOWN OF SOUTHAMPTON  
NEW YORK,

Respondent.  
-----X

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**Article 78 Certified Return Index**

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**Town of Southampton Town Clerk Record**

1. Hampton Bays Corridor Strategic Plan, submitted May 2008, revised July 2010.
2. Draft Generic Environmental Impact Statement (DGEIS) Hampton Bays Corridor Strategic Plan and Cumulative Impact of Build Out Study, dated November 2010.
3. Final Generic Environmental Impact Statement, Hampton Bays Corridor Strategic Plan & Cumulative Impact of Buildout Study, Hamlet of Hampton Bays, Town of Southampton, Suffolk County, New York, dated February 2013, with Appendices 1 -- 37.
4. Memorandum dated September 17, 2013, from Kyle P. Collins, AICP, Town Planning & Development Administrator, distributing Hampton Bays Generic Environmental Impact Statement Issuance of Findings Statement.
5. Memorandum dated September 17, 2013 from Sundy Schermeyer, Town Clerk, distributing Draft Hampton Bays Generic Environmental Impact SEQRA Findings Statement.
6. Hampton Bays Corridor Strategic Plan and Cumulative Impact of Build-Out Study SEQRA Findings Statement, dated September 2013.

7. Town Board Resolution No. 2013-1024, adopted November 12, 2013, accepting Findings Statement in connection with Hampton Bays Draft Environmental Impact Statement, Corridor Strategic Plan and Cumulative Impact of Build-Out Study.
8. Town Board Minutes Packet, Regular Town Board Meeting of November 12, 2013, Town Board Resolution No. 2013-1024, adopted November 12, 2013, accepting Findings Statement in connection with Hampton Bays Draft Environmental Impact Statement, Corridor Strategic Plan and Cumulative Impact of Build-Out Study.
9. Town Clerk mailing list for Resolution No. 2013-1024 and Acknowledgement letters generated by the Southampton Town Clerk, dated November 15, 2013 and November 18, 2013, as it relates to Town Board Resolution No. 2013-1024.
10. Town Board Resolution No. 2016-349, adopted March 22, 2016, Request for Proposals for Preparation of a Pattern Book for the Hampton Bays Downtown Overlay District.
11. Town Board Minutes Packet, Regular Town Board Meeting of March 22, 2016, Town Board Resolution No. 2016-349, Request for Proposals for Preparation of a Pattern Book for the Hampton Bays Downtown Overlay District.
12. Town Board Resolution No. 2016-544, adopted May 10, 2016, Reject Proposals for Preparation of a Pattern Book for the Hampton Bays Downtown Overlay District.
13. Town Board Minutes Packet, Town Board Resolution No. 2016-544, Regular Town Board Meeting of May 10, 2016, Reject Proposals for Preparation of a Pattern Book for the Hampton Bays Downtown Overlay District.
14. Town Board Resolution No. 2016-641, adopted June 14, 2016, Second Request for Proposals for Preparation of a Pattern Book for the Hampton Bays Downtown Overlay District.
15. Town Board Minutes Packet, Regular Town Board Meeting of June 14, 2016, Town Board Resolution No. 2016-641, Second Request for Proposals for Preparation of a Pattern Book for the Hampton Bays Downtown Overlay District.
16. Town Board Resolution No. 2016-838, adopted August 9, 2016, Award and Authorize the Supervisor to Execute a Contract with Historical Concepts for the Preparation of a Pattern Book for the Hampton Bays Downtown Overlay District.
17. Town Board Minutes Packet, Regular Town Board Meeting of August 9, 2016, Town Board Resolution No. 2016-838, Award and Authorize the Supervisor to Execute a Contract with Historical Concepts for the Preparation of a Pattern Book for the Hampton Bays Downtown Overlay District.
18. Fliers, November 14, 2016 and January 25, 2017 Meetings at Hampton Bays Senior Center to discuss ideas for future shaping and development of Downtown Hampton Bays.

32. Letter from Kyle Collins, AICP, Town Planning/Development Administrator, to PSEG Long Island, dated January 24, 2019, regarding proposed adoption of Zoning Code amendments that would create the Hampton Bays Downtown Overlay District ("HBDOD").
33. Hampton Bays Downtown Overlay District 2019 Draft Form Based Code, dated April 29, 2019.
34. Town Board Resolution No. 2019-596, adopted May 14, 2019, Deem Supplemental Draft Generic Environmental Impact Statement (SDGEIS) for the Hampton Bays Downtown Overlay District Adequate for Public Review, Set Combined Public Hearing for SDGEIS and Amendment to Chapter 330 to add Article XXXII, Sections 330-421 through 330-439 as the Form-Based Zoning Overlay District entitled 'Hampton Bays Downtown Overlay District' (HBDOD).
35. Supplemental Draft Generic Environmental Impact Statement, Hampton Bays Downtown Overlay District, Zoning Map and Code Amendments, Hamlet of Hampton Bays, Town of Southampton, dated May 2019, with the following Appendices and Figures:

- |               |   |
|---------------|---|
| Appendix A:   | FEAF Parts 1, 2, 3 Determination of Significance    |
| Appendix B-1: | HB DOD Regulating Plan, dated December 29, 2018     |
| Appendix B-2: | HBDOD FBC DRAFT, dated December 28, 2018            |
| Appendix B-3: | HBDOD Use Table                                     |
| Appendix C-1: | 10-Year Build Out Projections                       |
| Appendix C-2: | List of CPF Purchased Properties                    |
| Appendix C-3: | Commercial Market Analysis, dated September 6, 2018 |
| Appendix D:   | Site Environmental Assessment Conditions            |
| Appendix E-1: | SONIR Model Users Guide                             |
| Appendix E-2: | SONIR Model Results Existing Conditions             |
| Appendix E-3: | SONIR Model Results Proposed Conditions             |
| Appendix F:   | 2016 HB Annual Drinking Water Quality Report        |
| Appendix G:   | Community Service Correspondence                    |
| Appendix H-1: | Qualifications of Ecologist                         |

39. Letter from Andrew P. Freleng, Chief Planner for the Suffolk County Planning Commission, dated May 22, 2019, noting that Town Board Resolution No. 2019-596 will be deliberated at the regular meeting of the Suffolk County Planning Commission on June 5, 2019.
40. Legal Advertisement and Affidavit of Publishing from the Southampton Press Eastern and Western editions dated May 24, 2019, for Notice of Public Hearing on June 11, 2019 "to hear any and all persons either for or against the adoption of the proposed form-based Hampton Bays Downtown Overlay District Zoning Map and Chapter 330 (Zoning) Amendments that add Sections 330-421 through 330-439 for the optional zoning overlay entitled "Hampton Bays Downtown Overlay District," which will be applicable within the Central Business District of Hampton Bays from Springville Road to Ponquogue Avenue, extending to Good Ground Road to the South, and to Good Ground Park to the North (approximately 54.8 acres), and any comments on the accompanying analysis within the Supplemental Draft Generic Environmental Impact Statement (SDGEIS)".
41. Town Clerk Legislative Record Check List reflecting that the public hearing was opened on June 11, 2019.
42. NYSDEC ENB SEQRA Notice Publication Form, received by Town Clerk's Office on June 13, 2019.
43. NYSDEC ENB SEQRA Notice Publication Form, received by Town Clerk's Office on July 10, 2019.
44. E-mail from Gayle Lombardi dated December 16, 2019 and reply e-mail from Lin Marzano, Deputy Town Clerk, dated December 17, 2019.
45. Supplemental Final Generic Environmental Impact Statement, Hampton Bays Downtown Overlay District Zoning Map and Code Amendments Hamlet of Hampton Bays, Town of Southampton Suffolk County, New York, dated January 2020, with the following Appendices:
  - Appendix A: Public Hearing Transcripts dated June 11, 2019, June 25, 2019 and July 23, 2019, for Combined Public Hearing for SDGEIS and Amendment to Chapter 330 to add Article XXXII, Sections 330-421 through 330 as the Form-Based Zoning Overlay District entitled 'Hampton Bays Downtown Overlay District' (HBDOD)
  - Appendix B: Written Correspondence:
    - Hampton Bays Citizens Advisory Committee Meeting Minutes dated July 18, 2019
    - E-mail from Gerry Loesch, dated August 8, 2019

Appendix E: Build Out Information

Appendix F: Revised Fiscal and School Analysis

Appendix G: Hampton Bays Demographic Data.

46. Additional Written Correspondence, not already included in Appendix B of the Supplemental Final Generic Environmental Impact Statement, Hampton Bays Downtown Overlay District Zoning Map and Code Amendments Hamlet of Hampton Bays, Town of Southampton Suffolk County, New York, dated January 2020:
- E-mail from Jerilynn Bar dated August 1, 2019
  - E-mail from Alfred Caiola I Principal I Caiola Real Estate Group, dated August 1, 2019
  - E-mail from Doreen Bartoldus, PE, CCM, LEED GA , ENV SP, dated August 27, 2019.
47. E-mail from Gayle Lombardi, dated January 10, 2020.
48. Letter from Hampton Bays Citizens Advisory Committee, dated and received by Town Clerk's Office on January 14, 2020.
49. Town Board Resolution No. 2020-110, adopted January 14, 2020, Accept and File Notice of Completion of the Final Supplemental Generic Environmental Impact Statement (FSGEIS) related to the Amendment to Chapter 330 adding Article XXXII, Sections 330-421 through 330-439 as the Form-Based Zoning Overlay District entitled 'Hampton Bays Downtown Overlay District' (HBDOD).
50. Town Board Minutes Packet, Regular Town Board Meeting of January 14, 2020, Town Board Resolution No. 2020-110, Accept and File Notice of Completion of the Final Supplemental Generic Environmental Impact Statement (FSGEIS) related to the Amendment to Chapter 330 adding Article XXXII, Sections 330-421 through 330-439 as the Form-Based Zoning Overlay District entitled 'Hampton Bays Downtown Overlay District' (HBDOD).
51. Town Clerk mailing list for Resolution No. 2018-944 and Acknowledgement letters generated by the Southampton Town Clerk, dated January 16, 2020 and January 17, 2020, as it relates to Town Board Resolution No. 2020-110.
52. NYSDEC ENB SEQRA Notice Publication Form, received by Town Clerk's Office on January 15, 2020.

Jeffrey L. Seeman, CEP  
Certified Environmental Professional  
PO Box 130  
East Quogue, NY 11942  
631.872.9116  
jeffrey.seeman@icloud.com

February 21, 2024

Town of Southampton Town Board  
C/o Town of Southampton Department of Land Management  
Janice Scherer, Town Planning and Development Administrator  
116 Hampton Road  
Southampton, NY 11968

RE: Comment: Proposed Riverside Sewer District &  
Riverside Sewage Treatment Plant SDGEIS

Dear Ms Scherer,

For the record, my name is Jeffrey Seeman, national board-certified environmental professional, and consultant to the Riverhead Town Board, as the Town's legislative governing body and Commissioners of the Riverhead Sewer District.

The Riverhead Town Board has engaged my professional services to review and comment on the Proposed Riverside Sewer District, and its attendant SEQRA review. The Southampton Town Board is Lead Agency for SEQRA and prepared a Supplemental Draft Generic Environmental Impact Statement (SDGEIS) to evaluate impact potential. The SDGEIS process was used to supplement the earlier Generic EIS for the *Riverside BOA Step II Nomination Study, Riverside Revitalization Action Plan and Zoning Map and Code Amendments*, and its Findings Statement, dated December 22, 2015.

Pursuant to SEQRA, the Scoping for the Supplemental DGEIS for the Riverside Sewer District by the Lead Agency was optional. The Lead Agency decided not to publicly Scope the SDGEIS.

JS4w-1  
Sec. 2.1

This decision failed to identify significant environmental concerns early in the SEQRA process and to date the environment concerns identified by the Town of Riverhead and the public at large remain outstanding.

Furthermore, the Proposed Action is located within the proposed Environmental Justice Area (EJA) of Riverside and within the EJA located in Downtown Riverhead. An Enhanced Public Participation Program is required. To date, only the minimum public participation requirements of SEQRA and public hearing announcements needed for the formation of the Riverside Sewer District have been publicly noticed. These public notices are not substitutes for EJA standards. An approvable Enhanced Public Participation for the Proposed Action has not been distributed the Riverside/Riverhead/EJA community and must be available in English and Spanish languages.

JS4w-2  
Sec. 2.7

The Town of Riverhead has keen interest in the Riverside Sewer District project for the following reasons:

1. The Riverhead Sewer District's STP was listed as a SEQRA SDGEIS Alternative and assumed without study, the Riverhead STP's capacity to extend service to additional out-of-district users and was contrary to written comments by the Superintendent of the Riverhead sewer District. This scenario involved the Riverside Revitalization Action Plan (RRAP) Study Area's wastewater and sludge be connected and consolidated into the Riverhead Sewer District. Riverhead would be responsible for accepting and treating the Riverside wastewater at its STP and managing its biosolids. JS4w-3  
Sec. 2.1  
& 2.3
2. The Hamlet of Riverside's social, economic, and environmental conditions and Riverhead's Downtown Region are considered similar in character, demographics, and are substantially contiguous and forms a single community, each subject to EJA conditions. The Riverside is wholly within the Riverhead Fire District, the Riverhead School District, service area of the Riverhead Volunteer Ambulance and Riverhead Volunteer Fire Department. JS4w-4  
Sec. 2.9
3. Wastewater generated by the Suffolk County Facilities; (Evan K. Griffing Center), Courts (Arthur M. Cromarty Court Complex) and Suffolk County Correctional Facilities are connected to the Riverhead Sewer District and STP through an "Out-of-District Agreement." The arrangement was intended only as temporary (until Suffolk County developed other disposal alternatives) but has continued since the mid-1960s. JS4w-5  
Sec. 2.2
4. The County Facilities generate approximately 100,000 GPD of wastewater, have existing infrastructure in place and can easily be connected to the Riverside STP at a location east of the Traffic Circle, yet the Proposed Action does not propose to connect to the Riverside STP in Phase 1. JS4w-6  
Sec. 2.2
5. Riverhead has nearly finished its Updated Comprehensive Plan. The Plan proposes a Transfer of Development Rights (TDR) program to provide a Receiving Area within already sewered and/or easily accessible sewer district expansions to accommodate and incentivize increased densities needed to preserve open space located within the Sending Area. One targeted Receiving Area is located along West Main, a region within the Peconic River Corridor currently characterized by sub-standard septic systems that degrade groundwater and River water quality. JS4w-7  
Sec. 2.2
6. From the beginning of the SEQRA Public Participation and Comment period, Riverhead has advocated for the County's connection to the proposed Riverside Sewer District in Phase 1. JS4w-8  
Sec. 2.2
7. The SEQRA Public Hearing was closed on February 15, 2024; with acceptance of written comments extended until Sunday, February 25, 2024; anticipating the last date for written comments to be Monday, February 26, 2024. JS4w-9  
Sec. 2.1

Riverhead has reviewed the following documents:

- The proposed Boundary Map of the Riverside Sewer District, April 3, 2017.
- The SDGEIS-November 2023, prepared by Nelson & Pope.
- The Community Preservation Fund (CPF) Water Quality Improvement Program Application for Funding for, "Riverside Sewer System Year 2 Planning & Design," prepared by the Town of Southampton, dated June 2016.
- Town of Southampton Code Chapter 140: Article VI Water Quality Improvement
- Town of Southampton "Request for Qualifications for Professional Municipal Sewer Engineering Services for the Riverside Sewer Improvement Project"

- Riverside Revitalization Sewage Treatment Plan Clean Water State Revolving Fund (CWSRF) Engineering Report, revised June 2023, prepared by Nelson & Pope.
- Sections of, “DGEIS Riverside BOA, Revitalization Action Plan and Zoning Amendments, October 2015,” prepared by Nelson, Pope & Voorhis.
- RFQ Exhibit K-Estimated Collection and Pumping System Layouts.
- RFQ Exhibit N- Response Letter to Value Engineering Study (June 16, 2023, Nelson & Pope.
- Town of Southampton, NY Riverside Revitalization Sewage Treatment Plant and Collection System Value Planning Final Report, revised February 2022, prepared by ARCADIS.
- Hamlet of Riverside Sewer District Information Map & Plan Report, January 2024, Nelson & Pope.

Examples of where the documents show inconsistencies have been offered in writing to the Lead Agency. Additional examples are:

From the Hamlet of Riverside Sewer District Information Map & Plan Report:

*Section 2.6 Sewer Area and Service Area Boundary Description*

*“The proposed district service area will comprise of two hundred thirty-seven tax lots within the hamlet of Riverside as is shown in Figure 1 and Figure 2. The service area boundary does not include all properties located within the Hamlet. The high density residential and commercial properties were given priority for determining the service area.”<sup>1</sup>*

JS4w-10  
Sec. 2.2

As per the Hamlet’s existing conditions, this statement is not accurate. The Sewer Area and Service Area Boundary apparently was drawn and is described solely to favor new development of high density residential and commercial uses. It was not drawn with respect to wastewater generated by existing development. An accurate boundary of the Riverside Hamlet includes the existing County Facilities.<sup>2</sup> These existing County Facilities are mentioned in the SDGEIS on page 6-3<sup>3</sup>, with no description of their wastewater generation and qualify as “commercial/institutional.” The Sewer Area and Service Area Boundary provide no description of the County Facilities, why the land use was not identified as “high priority” commercial/institutional and why the County wastewater was excluded from the Riverside Sewer District Service Area Boundary.

Neither the Riverside Sewer District and STP SDGEIS nor the Riverside Sewer District Map & Plan adequately describe or address wastewater generated by the County Facilities. Neither document identified the quantity of wastewater generated or how this wastewater is managed. The SDGEIS focused on a predetermined area of study set forth by the earlier GEIS prepared for the RAAP. However, the SDGEIS expanded the study area boundary once it proposed the Riverhead Sewage Treatment Plant as an Alternative to the Proposed Action. Under this Alternative scenario, the wastewater from the County Facilities must be factored into the environmental assessment.

JS4w-11  
Sec. 2.2

<sup>1</sup> Nelson & Pope Engineers & Surveyors, Riverside Sewer District Map & Plan, Jan. 2024

<sup>2</sup> Ferrandino & Associates, et al, March 2004

<sup>3</sup> SDGEIS Riverside Sewer District, Nov. 2023

Using the Riverhead Sewer District and STP for managing the Riverside RRAP wastewater was one of the SDGEIS SEQRA Alternatives. This Alternative (Alternative 4) proposed to collect the wastewater generated by the Riverside Sewer District and pump the wastewater (via a force main) to the Riverhead STP for treatment and Alternative 5 proposed and scenario for Riverhead to dispose of the Riverside STP sludge. Alternative 4 proposed to eliminate the need for Southampton to construct the Riverside STP to accommodate the RRAP.

JS4w-12  
Sec. 2.1  
& 2.3

The two Alternatives required the Riverhead Town Board as Commissioners of the RSD to take an action (i.e., “make a decision”) to accept the Alternative(s), enter a “Shared Services Agreement” with the Town of Southampton, or reject the out-of-district wastewater and or biosolids generated by Riverside. The Commissioners of the RSD have not undertaken such action.

The SEQRA classification of the Town of Riverhead as an “Interested Party” and not a SEQRA “Involved Agency” was an error at the onset of the SEQRA Coordinated Review process. The Lead Agency and its lead consultants who prepared the SDGEIS and included the RSD as Alternatives have no record of decision by the Commissioners of the RSD, agreeing or not agreeing with the Alternatives. The SDGEIS relied only on a letter received from the RSD Superintendent, dated June 28, 2022.

JS4w-13  
Sec. 2.3

Even accepting the RSD Superintendent’s response as adequate for the SEQRA record, the letter confirmed the RSD could not accept the wastewater or sludges from Riverside. The SDGEIS did not offer an additional or substitute Alternative to convey the out-of-district Riverside wastewater to the RSD.

JS4w-14  
Sec. 2.3

Once these potential Alternatives were explored and ruled out, additional proposed Alternatives, must have been given the hard look under SEQRA. This approach reduced the Alternatives from five to three, including the No Build Alternative.

JS4w-15  
Sec. 2.3

The Lead Agency determined the SDGEIS, having the met the Scope (not subject to public input) “acceptable and complete” and released the SDGEIS for Public Comment in November 2023. This date is 16-months after the RSD explained (in the June 28, 2022 letter) the RSD could not accept wastewater or sludge generated by the Riverside project.

JS4w-16  
Sec. 2.3

The “RSD Alternatives” originated from the New York State Environmental Facilities Corporation’s review of the Riverside Sewer District Project. In a March 25, 2022, letter<sup>4</sup> from Nelson & Pope addressed to Michael Reichel RSD Superintendent it states among the purposes of their inquiry and possible discussion,

JS4w-17  
Sec. 2.3

*“As part of the NYSEFC review, they have requested we explore options to consolidate treatment. Riverhead Sewer District was identified as an option for consolidation.”* (Consolidation in this context means having a nearby STP provide wastewater treatment and sludge disposal, thus consolidating the treatment process under one facility).

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<sup>4</sup> SDGEIS Riverside Sewer District, Appendix K, Riverhead Sewer Availability Letter and Response

Why would Southampton's Riverside Sewer District not "consolidate" the wastewater flow from the County Facilities (currently accepted as an out-of-district flow by Riverhead) and provide treatment at the Riverside STP? This action of re-directing wastewater generated by the County from Riverhead's STP to the proposed Riverside Sewer District would require a decision by the Riverhead Town Board, therefore reinforcing their SEQRA responsibilities as an Involved Agency.

JS4w-18  
Sec. 2.3

The SDGEIS did not adequately explore this option. The SDGEIS did not fully describe sources of wastewater generated by "Existing Conditions" or provide an "Alternative" solution to manage wastewater within the Hamlet of Riverside. Considering the distance between the Riverside Sewer System and the Riverhead STP, one could easily determine the practicality and advantages of connecting the County's pump station (located at Nugent Drive) to the proposed Phase 1 stage of the Riverside project and treat the wastewater at the Riverside STP. Once it is constructed, it will be significantly closer than Riverhead STP.

The impacts generated by Riverhead Sewer District's continued acceptance of the County's wastewater is not limited to the capacity of the RSD ST, but as detailed below contain other limiting factors.

JS4w-19  
Sec. 2.3

Conveyance of the wastewater to the RSD via the County's Nugent Drive pump station, discharges to the infrastructure (manholes and sewer pipes) located at West Main Street and continues to flow easterly. This flow (100,000 GPD) limits the sewer system's capacity for accepting future connections within the Riverhead Sewer District proper. The age and diameter of the sewer pipes and pump station located at McDermott Avenue (East Main Street) are also limiting factors, and surcharges within this section of the infrastructure are not uncommon.

The Town of Riverhead should not be exposed to adverse impacts generated by accepting out-of-district wastewater when the Riverside Sewer District has ample capacity to include the County's wastewater. The Riverside sewer and STP projects are specifically designed and publicly financed to accept both existing wastewater and future wastewater described under the TDS. The SDGEIS simply developed a Riverside Study Area that excluded the Hamlet's true representation of the Existing Conditions relative to wastewater generation.

JS4w-20  
Sec. 2.12

The DGEIS/FGEIS and Findings Statement prepared for the RRAP was adopted by the Town of Southampton nearly a decade ago. A Supplemental GEIS should address relevant temporal and anthropogenic changes that have occurred since the issuance of the earlier Findings Statement. Instead, the SDGEIS for the sewer project relies on the original SDGEIS/SFGEIS.

JS4w-21  
Sec. 2.1

For example, the sanitary flow projections estimated in the Riverside Map & Plan are based on the DGEIS/FGEIS and their TDS:

#### *Section 3-Sanitary Flow Projections*<sup>5</sup>

"For the entire Riverside Hamlet, the anticipated flow rate was determined by a Theoretical Development Scenario (TDS) as described in the NP&V DGEIS<sup>6</sup>. The TDS estimated that new development would generate 538,065 GPD and 171,072 GPD of existing flow would remain."

<sup>5</sup> Nelson & Pope, Hamlet of Riverside Sewer District Information Map & Plan Report, Jan. 2024

<sup>6</sup> Nelson, Pope & Voorhis, Draft Generic Environmental Impact Statement (RAAP)

Therefore, the total sanitary wastewater estimated by the TDS is 709,137 GPD. However, it has since been determined that based on buildout scenarios, the average anticipated flow generated by the entire community will be approximately 800,000 GPD.” Below is the table from the DGEIS/FEIS that describes land uses proposed by the RRAP.

JS4w-21  
cont. 2.1

The TDS-Table 2-9 Reasonably Expected New Development Riverside Overlay Zones<sup>7</sup>

JS4w-22  
Sec. 2.1

<u>Land Use</u>	<u>Additional SF, Rooms &amp; Dwellings</u>
Retail	133,517 SF
Professional Office	37,000 SF
Medical Office	25,000 SF
Hotel	97 hotel rooms
Residential Units	2,267 Dwelling Units
Adult Care/Nursing Home	63,910 SF
Artisan Lofts/Production	30,900 SF
Cultural	11,032 SF
Indoor Ice/Hockey Rink	100,000 SF plus parking
<u>Land Use</u>	<u>Additional SF, Rooms &amp; Dwellings</u>
Parking Garage	550 spaces
Surface Parking Lots	1,602 spaces
On-Street Parking Spaces	1,107 spaces

Considering the expected 2,267 residential dwelling units are significant generators of sanitary wastewater and the Map & Plan stated, “*The high density residential and commercial properties were given priority for determining the service area.*”<sup>8</sup> one can recognize Southampton’s main purpose and benefit of the service area boundary is for “Expected New Development” and not for managing existing wastewater generated in Riverside. This concept shifts an extraordinary environmental burden upon Riverhead, because there is an expectation that Riverhead, not Southampton will continue managing the County Facility’s wastewater, even though the Facilities are located beyond the municipal boundary of Riverhead, but inside the Town of Southampton.

Reducing the TDS would serve to mitigate the severity of impacts to the Riverhead Central School District, Riverhead Fire District, Riverhead Fire Department, EMS and health care facilities provided by Riverhead.

JS4w-23  
Sec. 2.1

In the Final Generic EIS<sup>9</sup> prepared for the RRAP, the New York State Department of Environmental Conservation requested additional information regarding sanitary discharge and nitrogen impacts to surface and groundwater. The NYSDEC sought pre-project and post-project nitrogen loading to the groundwater so that it could be reviewed against the Total Maximum Daily Load limit (TMDL) for nitrogen established for the Peconic system.

JS4w-24  
Sec. 2.1

In response to the NYSDEC comment, the FGEIS stated additional analysis was performed, and determined that a reduced residential unit density and/or providing wastewater treatment for existing developed areas would provide a means to reduce nitrogen loading below what would

<sup>7</sup> DGEIS RRAP, October 2015

<sup>8</sup> Nelson & Pope Engineers & Surveyors, Riverside Sewer District Map & Plan, Jan. 2024

<sup>9</sup> Final Generic Environmental Impact Statement Riverside BOA, Revitalization Action Plan and Zoning Amendments, pp. 3-8; 3-9, Dec. 2015

occur in the Riverside revitalization did not occur. Based on this analysis. The following changes to the TDS and/or the considering of expanded sewerage would provide less nitrogen loading than without the project:

- Provide wastewater treatment for 200 existing units for units with a design flow of 225 GPD/unit.
- Provide wastewater treatment for 150 existing units for units with design flow of 300 GPD/unit.
- Reduce density by 1,100 units for units with a design flow of 150 GPD/unit.
- Reduce density by 750 units for units with design flow of 225 GPD/unit.
- Reduce density by 550 units for units with design flow of 300 GPD/unit.

The reduction in residential dwelling units by 1,100 units at 150 GPD/unit would reduce wastewater flow by 165,000 GPD; reduction in density by 750 units at 225 GPD/unit would reduce wastewater by 168,750 GPD; and reduction in density by 550 units at 300 GPD/unit would reduce 165,000 GPD.

The SDGEIS for the Riverside Sewer District did not provide a reduced density alternative. The reduction in residential units (based on the FGEIS for the RRAP) indicates that the wastewater flow generated by the County Facilities could be accommodated by the Riverside STP, simply by reducing the number of residential dwelling units proposed in the TDS. This residential density reduction would likewise reduce other environmental impacts on Riverhead's municipal services, school district, et cetera.

This is certainly the core issue and one can speculate why the exclusion of the wastewater management generated by the County Facilities: (1.) a simple "oversight," due to a lack of understanding or adequate due diligence regarding existing conditions during the preparation of the SDGEIS (2.) intentionally (arbitrary), to accommodate the wastewater flows from the TDS and foster a particular conclusion based on the proposed Riverside Sewer District capacity; (3.) to ignore an obligation to "consolidate" wastewater as recommended by the NYSEFC; (4.) to reduce costs associated with connecting the County Facilities' existing infrastructure to the Riverside Sewer District Phase I.

To date, with the SEQRA Comment Period quickly closing, the Lead Agency has provided no clear response to the number of important questions and comments provided by Riverhead, thus leaving the response to be found in the Final Generic Environmental Impact Statement. SEQRA does not require a Public Comment period or Public Hearing on the FGEIS.

The LI Central Pine Barrens review and the Town of Southampton's public input on the Map & Plan are currently incomplete. With the SEQRA comment period closing in advance of these important reviews, at what stage does a potential for segmented review concern the Lead Agency?

SEQRA does not prohibit a Lead Agency from providing response to questions and comments in advance of the FGEIS. One purpose of SEQRA is to encourage public participation, especially in large scale projects of regional significance. Factoring in the decision to exclude public Scoping of the DGEIS and a formal enhanced public participation plan as per EJA requirements, an

JS4w-24  
cont. 2.1

JS4w-25  
Sec. 2.3

JS4w-26  
Sec. 2.1

JS4w-27  
Sec. 2.3

JS4w-28  
Sec. 2.1

accelerated SEQRA review to meet predetermined deadlines, could leave the Lead Agency exposed to future challenges.

↑ JS4w-28  
cont. 2.1

Please accept this as additional Town of Riverhead comments to the SDGEIS for the proposed Riverside Sewer District and STP and as part of the official SEQRA record. Thank you.

Sincerely,

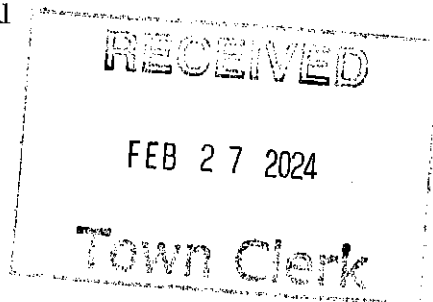
*Jeffrey L Seeman, CEP*

Jeffrey L. Seeman

Certified Environmental Professional

TB Meeting 2/27/24  
P.H. #1

Jeffrey L. Seeman, CEP  
Certified Environmental Professional  
PO Box 130  
East Quogue, NY 11942  
631.872.9116  
jeffrey.seeman@icloud.com



February 27, 2024

Town of Southampton Town Board  
C/o Town of Southampton Department of Land Management  
Janice Scherer, Town Planning and Development Administrator  
116 Hampton Road  
Southampton, NY 11968

RE: Public Hearing Comments February 27, 2024: Proposed Riverside Sewer District Boundary Map & Plan: Phases 1 & 2

Dear Ms. Scherer,

For the record, my name is Jeffrey Seeman, national board-certified environmental professional, representing the Riverhead Town Board, as the Town's legislative governing body and Commissioners of the Riverhead Sewer District.

The Riverhead Town Board has provided Public Comments to the SDGEIS prepared for the Proposed Riverside Sewer District on December 12, 2023; January 23, 2024; and February 15, 2024.

At the February 15, 2024, Public Hearing, a continuation of the SEQRA process, and the first Hearing on the Proposed District Map & Plan, the Riverhead Town Board emphasized its recommendations that the Suffolk County Center, Courts and Jail be included in the proposed Riverside Sewer District Phase One Boundary and the County's wastewater be consolidated into Riverside's sewage treatment plant.

JS3w-1  
Sec. 2.2

The Riverhead Town Board again states the purpose of the Riverside Sewer District is to provide sewage treatment for existing facilities located in the Town of Southampton's Riverside Hamlet, including the Suffolk County Facilities. The Riverside Sewer District Boundary, as proposed, is inadequate and fails to address the County's wastewater needs. The proposed Map & Plan needs to be amended before adoption by the Southampton Town Board so that the County Facilities are included in the District Boundary.

JS3w-2  
Sec. 2.2

Thank you for your consideration.

Sincerely,  
Jeffrey L. Seeman  
Jeffrey. L Seeman, CEP

2/29/22

Town Sewer Dist:

I missed the meeting for the approval of sewers at Riverside on Feb.

I want to vote that I am in favor & vote "yes."

With 3 lots on the river side of Rt 24-, it would be a environmental plus, for all.

Thank you

Stephen McDonley  
14 Flanders Rd  
11901

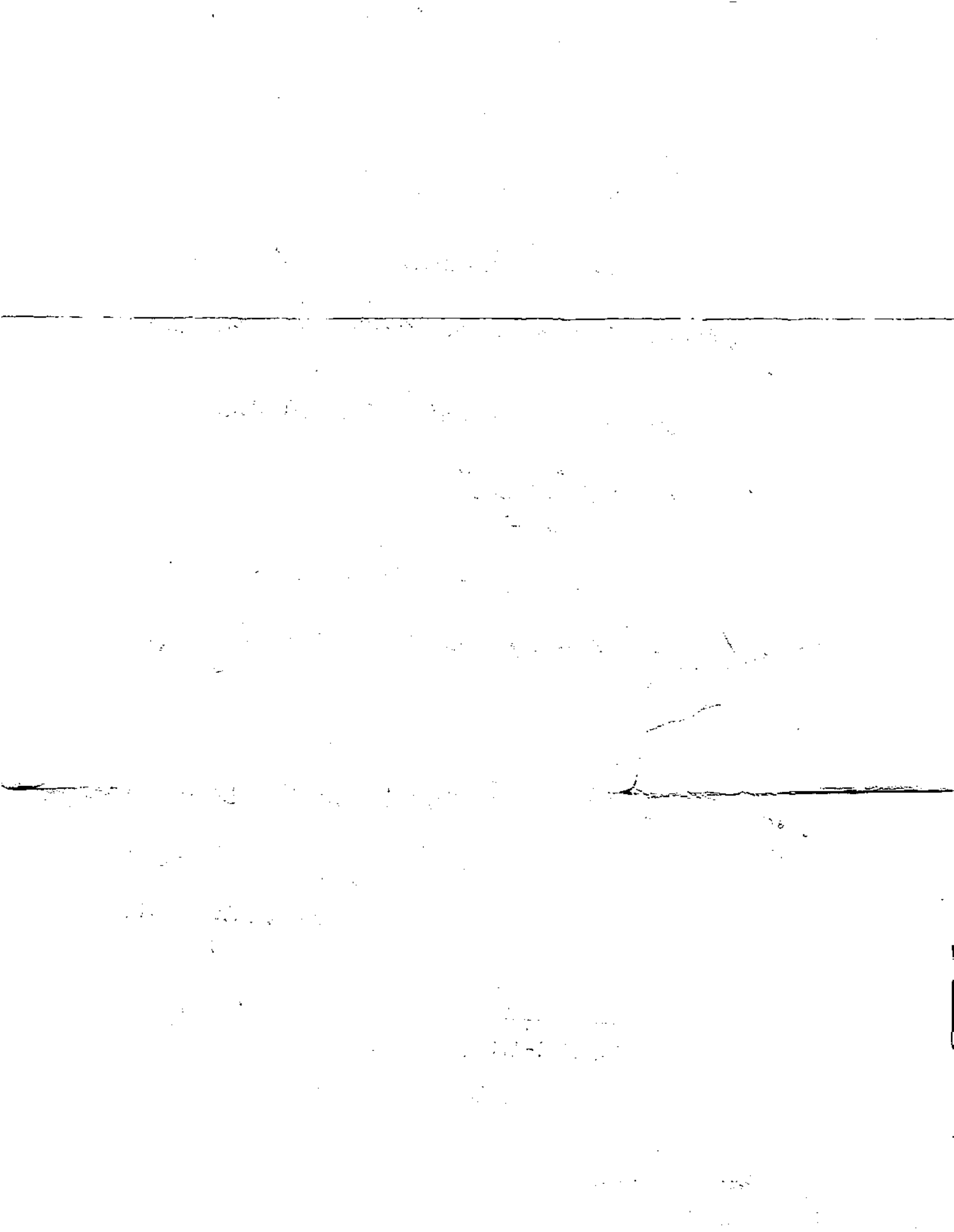
TOWN CLERK'S OFFICE  
TOWN OF SOUTHAMPTON

2022 MAR - 6 P 1:55

RECEIVED

I apologize for being late.  
LM

StMc-1  
Sec. 2.14



**COUNTY OF SUFFOLK**



**EDWARD P. ROMAINE**  
SUFFOLK COUNTY EXECUTIVE

**DEPARTMENT OF ECONOMIC DEVELOPMENT AND PLANNING**

**SARAH LANSDALE**  
COMMISSIONER

**ELISA PICCA**  
CHIEF DEPUTY COMMISSIONER

March 25, 2024

Town of Southampton  
116 Hampton Road  
Southampton, NY 11968  
Attn: Janice Scherer, Planning & Development Administrator

SEQRA

Re: Riverside Sewage Treatment Plant  
Municipal File No.: Siting and construction of a Community Sewage Treatment  
Plant in the Hamlet of Riverside  
S.C.T.M. No.: 0900 14100 0100 009014 et al  
S.C.P.C. No.: SH-24-LD

Dear Ms. Scherer:

The SEQRA information on the Supplemental Draft Generic Environmental Impact Statement (SDGEIS) for the above project was received by the Suffolk County Planning Commission on March 6, 2024. Thank you for providing this information. SCPC1-1 Sec.

Please note that while the Suffolk County Planning Commission does not have comments at this time, the Suffolk County Planning Commission reserves the right to comment on this proposed action in the future and wants to be kept informed of all actions taken pursuant to SEQRA and continued to be provided with all related SEQR information.

Thank you and please let us know if you have any questions.

Very truly yours,

*John Corral*

By Christine DeSalvo

John Corral, Environmental Projects Coordinator  
Division of Planning & Environment

JC/cd