

David Reagon
Chair, Amenia CAC
23 Benson Rd.
Wassaic, NY 12592

September 18, 2014

Chairman Fontaine and members of the Amenia Planning Board,

Over the past several meetings, the CAC has discussed Silo Ridge's Amended Master Development Plan and Special Use Permits and we have the following comments.

The CAC was an "interested party" in this process, yet we did not receive any of the relevant materials except some minor materials. This made our review much more difficult.

We strongly feel that all of the relief that Silo is asking from the Town Zoning in the form of waivers be examined closely by the Planning Board. Waivers should only be granted in extreme cases, not simply because the applicant finds that the zoning is inconvenient or an impediment to the applicant's proposal. We are completely opposed to the granting of waivers that would allow building on steep slopes as defined in the zoning and especially in the Scenic Protection Overlay District of the proposed project.

The applicant has not demonstrated to our satisfaction that they have mitigated the visual impact of the project on the DeLaVergne Hill viewshed. Their visual impact study demonstrates that certain elements of the project will materially change the viewshed and does not indicate, in our opinion, a sufficient mitigation. Of particular concern are the houses that are planned for the steep slopes.

We have reviewed the storm water protection plan and the SWPPP and we feel that it is based on an inadequate assumption of a 100 year storm. The Planning Board is being misled on the definition of a 100-year storm. A 100-year storm is a storm that statistically has a 1% chance of happening. It can happen two days in a row. In Amenia, the 100-year storm is defined as a storm that will produce 8 inches of rain in 24 hours. The storm water protection plan is based on that. There is no provision in the plan for two storms in a short period of time and there is no consideration that most hydrologists believe that due to climate change, so called 100 years storms are occurring much more frequently and should be redefined as a 50 year storm. On August 13, 2014 Amenia got around 1.6 inches of rain in an hour. The Silo Ridge golf course construction storm water protection system partially failed in at least three locations leading to a discharge of sediment into Amenia Stream and into the small wetland/pond at the entrance to the project. Silo has rejected most of the green infrastructure proposals that would help remedy storm water runoff. They should reconsider this and they should change the SWPPP to reflect that the climate is changing and it is universally agreed that more violent storms will be a feature of climate change in this region of the United States.

We think that the Planning Board took a huge risk by granting waivers that have allowed so much excavation to occur on the present golf course construction. One significant storm could overwhelm the stormwater protections that are in place. It's still hurricane season and convective storms are still a strong possibility.

We are disturbed by the applicant's response to many of the questions posed by the Town's consultants which often consist of "comment noted", "we will seek a waiver", or "we don't agree" without any apparent follow-up. And we are really disturbed that many of the meetings that the applicant had with the consultants and some Planning Board members were closed meetings that were not posted and no minutes taken. It seems to us that there was no public conversation relative to the consultants' comments and that not all Planning Board members actually reviewed the comments.

We are not opposed to this project. We feel that if properly done, it could have a positive benefit for Amenia. We urge the Planning Board to take the proper steps to ensure that the environment is being protected and the zoning is being followed. We don't feel it is anyone's interest if the project is derailed.

Sincerely,

David Reagon, CAC Chair