

## Save The Ridge



[www.savetheridge.com](http://www.savetheridge.com)

PO Box 326 Walkill, NY 12589  
845 895-5577

April 16, 2003

Mr. Scott Sheeley  
Environmental Analyst  
New York State Department of Environmental Conservation, Region 3  
21 South Putt Corners Rd.  
New Paltz, NY 12561

RE: Awosting Reserve, LLC/ Town of Gardiner, SEQRA Review

Dear Mr. Sheeley,

A working group of professional natural scientists and social scientists affiliated with Save The Ridge would like to call your attention to multiple negative environmental impacts that the construction of the proposed Awosting Reserve gated housing development and golf course in Gardiner, New York has the potential to cause. We expect that the Department of Environmental Conservation will appropriately issue a positive declaration of significance under SEQRA with respect to the proposal to construct a major suburban housing development on ecologically sensitive land that is a treasured regional resource. On behalf of Save The Ridge, we urge the DEC to explicitly cite the negative environmental impacts delineated in this letter in its positive declaration.

### **I. POTENTIAL FOR SIGNIFICANT ADVERSE IMPACTS ON WATER AND AIR RESOURCES**

The stated plans to use groundwater supply from individual residential wells, drilled into the fractured bedrock aquifer, as a water supply, and to construct a wastewater treatment plant for residential effluent, have the potential to impose large-scale impacts as described below.

#### **A. Impacts to Groundwater**

1) Adequacy of supply: A significant potential exists that a network of hundreds of individual wells in low permeability fractured bedrock will not be able to meet water demand on a long-term average annual basis, during moderately severe droughts, and during short-term peak demand periods. There is also the potential that pumping from several hundred proposed new residential wells could negatively impact existing wells at surrounding properties because increased groundwater pumping could decrease groundwater levels.

2) Ecosystem impacts: Pumping from project wells could adversely affect base flow to streams by intercepting groundwater that would have discharged into the creeks or by inducing seepage from creeks into the ground. Seepage from groundwater also provides

water for springs, ephemeral or temporary streams, and vernal pools. These locations, in turn, provide critical habitat for many species of plant and animal life, which therefore may also be adversely impacted.

3) Long term impacts: Increased runoff due to development of impervious surfaces, and decreased recharge due to pumping and loss of groundwater as wastewater (via transport out of the basin after wastewater treatment and discharge) will change the groundwater budget. These effects could cause long term water level decline, diminished stream or spring baseflow, and groundwater overdraft. These effects also have the potential to adversely impact groundwater quality. Contamination of groundwater by the proposed housing development could occur both onsite and offsite.

4) Impacts to lakes in the area, including Ridge lakes: The "Sky Lake" surface water features of Lake Awosting and Mud Pond are underlain by fractured bedrock in direct contact with the fractured bedrock aquifer that has been proposed as the project's water supply. Bedrock structural and fracture trace mapping indicates that regional bedrock fracture orientation could provide a hydraulic connection between these lakes and project wells. The proposed pumping could result in a capture zone that induces seepage from Sky Lake surface water and creates water level changes in the lakes during drought periods.

### **B. Impacts to Surface Water**

1) Potential sources of degradation of surface water due to source discharges include but are not limited to golf course chemicals, lawn and outdoor household toxics use, road salt application, animal wastes from pets and increased sediment transport from erosion. In addition, potential failures of the project's proposed wastewater treatment plant could introduce wastewater into surface water. Combined, these sources can have a significant negative impact on stream ecology and aquatic habitat.

2) Increased flooding or erosion could occur from increased volume and velocity of stormwater runoff, especially due to construction or road building on steep slopes and increased runoff from impervious surfaces. Construction activity such as specific locations of cuts and fills, stream crossing culvert locations, building pads and roadways, and blasting or ripping for excavation all have the potential to cause significant adverse impacts on surface water quality. Finally, project-induced loss of riparian vegetation adjacent to the stream could significantly increase the likelihood of excessive bank erosion and also impact the thermal conditions important to cold water habitat.

### **C. Impacts to Air Quality**

The construction of more than 325 houses with furnaces and fireplaces adjacent to the steep slopes of the Shawangunk Ridge could result in significant adverse impacts to air quality, with attendant health impacts, because of the prevalence of temperature inversions near steep ridges that trap smoke and noxious gases.

## **II. POTENTIAL FOR ADVERSE IMPACTS ON BIOLOGICAL RESOURCES**

The Awosting Reserve provides habitats for a considerably greater number of species identified by New York State as either critically imperiled due to extreme rarity, imperiled or rare than is acknowledged by the developers. The same is true for species that New York State considers to be of special concern. The Awosting Reserve also contains bio-systems that the New York State Natural Heritage Program describes as Uncommon Communities. What follows are the potential adverse environmental impacts to these biological resources.

- 1) Forest fragmentation is an inherent element of the proposed development and has a very high probability of disrupting existing biological communities. Probable disruption of natural predator/prey population ratios could include an increase in nuisance and invasive species. Public health risks, with Lyme's disease as one instance, could increase due to the proliferation of nuisance and invasive species. Major impacts on the biodiversity of the Shawangunk Ridge would not only occur within the boundaries of the Awosting Reserve but also have geographically wider effects on species that may use the property for any portion of their habitat needs. For instance, the Shawangunk ridge is a significant part of the Appalachian hawk flyway, and a large-scale housing development may be quite disruptive to migration patterns.
- 2) A project of this scale is likely to affect the characteristics of water in the streams draining the Awosting Reserve property, which would in turn affect the streams' biota. Project impacts could also affect presently intermittent streams, wetlands and vernal pools and their respective functions in the property's biological systems.
- 3) The potential exists for adverse impacts on old growth trees within the Awosting Reserve, especially in the Palmaghatt Ravine. In addition, a suburban housing development such as is proposed will necessarily impose suppression of fires that are part and parcel of the natural cycle of Ridge Ecosystems.

## **III. POTENTIAL FOR ADVERSE ROAD AND TRAFFIC IMPACTS**

- 1) Vehicles traveling to and from the two entry points to the housing development, plus the separate entrance to the proposed golf course, would radically increase traffic loads and, in consequence, damage the present quality of life for residents neighboring these presently tranquil country roads. Children will be subject to particular risk. The traffic effects would necessarily spill over from roads immediately adjacent to the proposed three entry points to the Awosting Project to residents presently living near routes such as Tillson Lake Rd, or regularly using these routes to gain access to their homes.
- 2) During the 10-year construction period projected by the developer, movement of heavy vehicles and equipment would cause correlating intensive use of existing roads, with the attendant impacts on adjacent residential areas, as well as high levels of noise pollution, fumes, and dust.

3) Once completed, the project would create higher traffic loads than currently estimated by the developer. First, because the proposed layout of the Awosting Reserve project is atypical of a cluster development and therefore requires an extensive road layout, the resulting road system would permanently impose far higher road traffic noise and other pollution on surrounding communities and animal populations than would genuinely clustered housing. Second, daily trips by employees typically employed by upscale homeowners, contractors providing services, etc., and the number of people likely to be year-round residents rather than seasonal and weekend users further enhances potential adverse traffic impacts.

#### **IV. POTENTIAL FOR ADVERSE VISUAL AND NOISE IMPACTS**

1) Permanent and highly visible scarring of a major portion of the northern Shawangunk Ridge, the defining landscape feature of a wide surrounding region, would be caused by the Awosting Reserve project. Both local residents and legions of visitors treasure this viewscape. Degrading this viewshed would entail both an economic and aesthetic loss for the surrounding communities.

2) Given the nature of the terrain confronting the developers, construction could entail blasting and other construction techniques that would impose excessive and disruptive noise and vibration impacts on surrounding residents and biotic communities.

#### **V. POTENTIAL FOR ADVERSE IMPACTS ON COMMUNITY CHARACTER**

1) The proposed, gated Awosting Reserve development would have a significant adverse impact on the character of the surrounding rural and small town communities, changing that character from one which emphasizes open space, wildlife and recreational uses to another which is inherently suburban in nature. The size of the proposed project and where it is located, the number of additional people it would introduce into the community, the type of development, a gated housing development for the affluent, and the loss of open space are all inconsistent with the existing community and its goals for itself, as laid out in the Town of Gardiner's master plan.

2) In addition, the infrastructure required by such a development will transform local government from that of a town to a municipality, thereby significantly altering the relationship that community members have with their government and the services that it provides. For example, services currently provided by volunteer community members, such as fire and medical emergency services, would have to be transferred to a paid, full time force.

Because flawed methodology permeates much of the sketchy document submitted to the DEC by Awosting Reserve, LLC – most often, only one possible impacts scenario is presented, that which is most favorable to the developer's project – we urge DEC to issue a positive declaration of significance based on the potentially significant environmental impacts identified by the impacted community and public, in this and other letters that you have received, and not solely on the developer's presentation of possible impacts. Thank you for your consideration of our views and concerns.

Sincerely yours,

Peter A. Conde, P.G., Hydrogeologist  
Save The Ridge Research Committee

**Contributing scientists and engineers:**

Joseph Hayes  
Daniel Davis  
Peter Conde  
David Straus  
Karen Schneller-McDonald  
Paul Muessig

**Contributing social scientists:**

Philip Ehrensaft  
Constance Nathanson  
Jerry Fons  
David Porter

cc: Marc Moran  
Regional Director  
DEC Region 3