

Appendix F-2
Group for the East End Letter

March 28, 2017



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RE: Hills DEIS Comments

Dear Members of the Southampton Town Board:

The following comments are provided to supplement testimony I gave before you on November 7, 2016 and January 10, 2017 at the East Quogue School.

On December 23, 2014, the NYS Department of Environmental Conservation (DEC) announced an update for the State's Wildlife Action Plan (SWAP). Included in the SWAP was a revised *Species of Greatest Conservation Need*, which features upwards of 372 wildlife species facing local extinction within the next 10 years if efforts to control large-scale development are not implemented. Of those on the list over 200 are present on Eastern Long Island.

This treatise contains language that states the DEC does not have the staff or resources to combat such a decline in wildlife. They are seeking help not only from environmental organizations, but also from civic groups and municipalities.

During the past decade development projects in general have slowly reduced the size of natural habitat communities, resulting in more wildlife scrambling for shelter and food to simply exist. In short, these successive development projects are a death by a 1,000 cuts, and our wildlife resources are paying the price.

For example, the literature documenting the substantial loss of area-sensitive species is extensive and many of the species identified as *Species of Significant Conservation Need* in the SWAP achieved this unfortunate status due to incremental destruction of large blocks of natural habitat. The result is the creation of an ever-increasing amount of "edge" areas that border major development projects, e.g. golf courses.

So when a project like "The Hills" comes along the impact is much more profound and the result to wildlife resources much more dire. While it is noted that the developer must preserve open space as required by the PDD legislation, the landscape will be radically transformed from the bucolic native Pine Barrens, oak forests and grasslands to a more manicured country club atmosphere.

F-2.1
Sec. 2.3.1

In November 2016, the Pine Barrens Review Committee sent the Town Board a comment letter on The Hills DEIS. Our organization concurs with the Committee's concerns and we oppose any project that does not fully address those identified by the Committee or maximize the conservation objectives of the SWAP. There are 12 points regarding the Central Pine Barrens Comprehensive Land Use Plan in the Committee's letter and three are addressed below.

First, comment #4 states, "the Project Sponsor should prepare a reduced yield alternative that includes all three Project parcels and that reduces the

F-2.2
Sec. 5.7.1



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density development overall. It also recommended that the Project Sponsor prepare a cluster development plan based on the as-of-right development involving all three Project parcels, with development clustered to the south." The Reduced Impact Alternative we provided will feature 86% less developed area.



Second, comment #7 contains eight questions pertaining to the "overall clearing amount" for the Project, which cannot be determined by the Commission. This is because the DEIS is misleading and lacks the required information on the specified amounts to be cleared. What the developer may claim to be open space will not be a naturally occurring habitat but landscaped. The Reduced Impact Alternative we propose has 74% less clearing and will not require any, i.e. 100% less, fertilized turf.

F-2.3
Sec. 1.6.2

Third, comment #8 in the letter further states that, "specific mitigation measures should be provided and described in detail" for more than two-dozen species. If the developers cannot work to put mitigation measures in place than it is up to the Town Board to do so.

F-2.4
Sec. 2.3.1


Therefore, if you cannot bring total preservation to this property, then accept the Reduced Impact Alternative, developed by the renowned conservation design firm of Dodson and Flinker, that will provide 100% more preserved contiguous open space.

The Hills project, if approved, will not only be on the largest tract of unprotected open space in Southampton Town but it will be the largest development project on the entire East End. Without question The Hills is the largest development project we have seen in over a decade.

Given its size and substantial natural state, the wildlife resources that this area provides for numerous species of documented conservation concern are extremely high. Any proposed development should demonstrate full compliance with the standards and policies of the Central Pine Barrens Commission and DEC. As proposed, the Hills does not achieve these objectives and should not proceed.

Thank you for your time and consideration of these comments.

Sincerely,


Aaron Virgin
Vice President

Aaron Virgin has served as Vice President of Group for the East End since 2010. He has a Master's Degree in Wildlife Ecology and Management from The College of Environmental Science and Forestry, Syracuse, and a Bachelor's Degree in Environmental Science from Plattsburgh State University. Prior to working for the Group managing the organization's wildlife stewardship program across Eastern Long Island, Mr. Virgin worked for more than 8 years as a biologist for the Audubon Society.