Shawangunk Ridge Coalition

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Chairman John Piazza and Planning Board Members Mamakating Town Hall 2948 Route 209 Wurtsboro, NY 12790

The Shawangunk Ridge Coalition (SRC) comprises national, regional, and local conservation organizations dedicated to protecting recreational, biodiversity, scenic, and natural resource values of the Shawangunk Ridge. The coalition focuses primarily on monitoring development proposals that would diminish the resources of this regionally and nationally recognized landscape.

In the case of the Seven Peaks proposal, numerous resources of statewide significance will be put at risk due to impacts associated with this development. The site is part of the Shawangunk Mountains Priority Project Area identified in the NYS Open Space Conservation Plan (2006), and is thereby considered a resource of regional and statewide significance. The Open Space Plan highlights that the elements of biodiversity found in the Shawangunks make it one of the highest priority areas for biodiversity conservation in the northeastern United States.

The Plan specifically identifies protection of the southern Shawangunks in Orange and Sullivan County as a priority for recreation, watershed protection and biodiversity conservation. It recommends completing and buffering the 30 mile long Shawangunk Ridge Trail. It also recommends protection of the ridgetop and both its western and eastern slopes, which contain the 2,360 acre NYS Bashakill Wildlife Management Area, another important area for biodiversity conservation. The proposed 7 Peaks development straddles the ridgetop and extends down both the western and eastern flank of the Ridge, draining both to the Basha Kill Wildlife Management Area and to the Shawangunk Kill.

This project therefore deserves and requires the most stringent environmental review. The Shawangunk Ridge Coalition believes that this DEIS falls short of this requirement.

- We support the DEC position that the proposed conservation alternative described in this DEIS
 does not meet the requirements outlined in the Scope or the requirements of SEQR. We agree
 that there is insufficient detail to sustain a reasonable assessment and comparison of the
 impacts of the alternatives. DEC should use its full authority to make sure the final plan and
 assessment addresses all of the issues outlined in the Final Scoping document.
- Since this proposed development includes three phases, the impact of all three phases should be considered at this time. In other words, this should be analyzed as one development.
 Segmenting analysis of the environmental impacts into three separate studies is artificial and misleading. This should be addressed in a revised DEIS.
- We note that the analyses prepared by consultants James Barbour and Katherine Beinkafner for the BKAA similarly find significant shortcomings in the study of impacts on natural resources, particularly "rare species and their critical habitats, sensitive ecological communities, wildlife

corridors, rock outcrops, streams and wetlands." These are impacts as well to the human community in the area. They need to be adequately assessed.

While the DEIS does acknowledge the potential risk of wildfire to homes on the site, it does not
accurately describe the factors which contribute to wildfire risk at the site, nor does it recognize
the increased risk posed by development on the site. The DEIS does not adequately describe
mitigation measures which would be necessary to address this risk, on the part of the
developer, homeowners and the local fire district. The potential costs of developing this high
risk wildfire site to the local community should be assessed.

Finally, we concur with these comments by ecologist James Barbour:

"There is an opportunity for Seven Peaks to be a model project for environmentally protective development along the Shawangunk Ridge. The success of the project in this respect could have great economic benefits for the developer, the Town of Mamakating, and the region. Tourists drawn to protected lands such as Minnewaska State Park and Mohonk Preserve have boosted the economies of communities such as the Town of New Paltz. The attraction is the grandeur of the Shawangunk Ridge ecosystem. Conventional development with its high environmental impact load will not do in this region. It is not viable environmentally or economically, and undermines a sustainable and prosperous future for the region.

"The Mamakating Planning Board should exercise vigilance in assuring that the final plan for the Seven Peaks development meets all standards of Scoping, SEQRA and DEC, as well as those of the sources I refer to in these comments. Make Seven Peaks worthy of its natural setting by making sure the ridge and its irreplaceable natural resources are totally protected."

Respectfully submitted,

Keith LaBudde

For the Shawangunk Ridge Coalition

Basha Kill Area Association
Casino Free Sullivan County
Cragsmoor Association
Friends of the Shawangunks
Mohonk Preserve
New York-New Jersey Trail Conference
Orange County Land Trust
Save the Ridge