



December 2, 2020

Julie Hargrave, Principal Environmental Planner
Central Pine Barrens Joint Planning & Policy Commission
624 Old Riverhead Road
Westhampton Beach, NY 11978

Re: Lewis Road PRD
Response to Comments
Hearing of November 18, 2020
NPV No. 05105

Dear Ms. Hargrave:

This letter provides a response to the Central Pine Barrens Joint Planning & Policy Commission (the "Commission") hearing of November 18, 2020. NPV received the draft staff report prior to the meeting, and provided a response letter on November 18, 2020. This letter provides an update to that response, and addresses public comments from the hearing as well as any written comments that we are aware of as of the date of this letter.

Most important, is to refer you to the record of evidence that has been provided on behalf of the applicant with respect to the Lewis Road PRD application since the submission of the initial application December 23, 2019. This record of information includes the following documents:

- NPV initial application submission; 12/23/2019
- NPV project clarification letter; 2/4/2020
- NPV presentation; 2/19/2020
- NPV submission; 6/3/2020 report
- N+P Grading and Clearing plans; 7/1/2020
- N+P Slope map; 7/1/2020
- N+P Road Abandonment strategy; submitted 7/1/2020; dated 5/1/2020
- NPV presentation showing changes from Decemember to June; 6/15/2020
- NPV updated maps/comparisons; 8/18/2020
- NPV presentation at the hearing 8/19/2020
- NPV response to August 19 hearing and staff report; 8/26/20
- NPV submission; 10/9/2020
- NPV response to staff report; 11/18/2020

Of course the full record includes the DEIS/FEIS, SEQRA Compliance documents and full SEQRA information available with respect to the project, which should also be referred to for decision making and adoption of a Statement of Findings by the Commission.

The applicant has refined the project during the course of the review process, to provide better conformity with the applicable Standards and Guidelines of the Central Pine Barrens Comprehensive Land Use Plan (CLUP). In doing so, the final submission plans and accompanying narrative clearly demonstrate conformance with all Standards and Guidelines of the CLUP. It is noted that the evidence provided by the applicant affirmatively identifies how and why the application is consistent with the CLUP. Agreement of consistency with most of the Standards and Guidelines is provided in the Staff Report for the August 19, 2020 hearing. The review of several remaining Standards or Guidelines has not been finalized through staff reports; however, we point out that no contrary evidence has been presented that would refute the applicant's detailed analysis of conformity. Further, strict reading of the actual language of the remaining Standards or Guidelines finds that the Lewis Road PRD achieves conformance with respect to the provisions of the CLUP. This letter will review the outstanding items with respect to conformity in order to provide final resolution.

The Public Hearing of November 18, 2020 was intended to only address the changes in project plans since the August 19, 2020 hearing. The applicant focused remarks only on the changes and further relied on the record of submitted information, consistent with the guidelines for the meeting. The public comments went well beyond the scope of the meeting not only with respect to going beyond the project changes, but also beyond the authority of the Commission. As a result, a point-by-point response is not necessary to address public comments. However, certain myths were stated during the hearing that warrant correction for the purpose of the record before the Commission. Key myths are dispelled below:

The Hills PDD was not "denied" by the Town Board of the Town of Southampton – a prior application for a change of zone to PDD was reviewed by the Town Board. The proposed project was a seasonal resort community based on the zoning density of the site of 118 units, clustered in the south-central part of the site. The application involved the zoning base density of the site which is 118 units; however, the PDD would have allowed a commercial/membership golf course with outside memberships in addition to the as-of-right yield of the property. The Hills PDD was the subject of an Environmental Impact Statement (EIS) process that included a Draft EIS, Final EIS and Statement of Findings by the Town Board. The Statement of Findings "To Approve" the project was adopted by majority vote of the Town Board. The PDD under Southampton Town Zoning Law applicable at the time required a majority plus one vote to be approved. The PDD was approved by a 3 to 2 vote of the Town Board, which was not sufficient to gain approval. As a result, the applicant pursued an as-of right development before the Town Planning Board, the Lewis Road PRD.

Additional SEQRA review is not needed for the Lewis Road PRD – after completion of the Draft/Final EIS and Statement of Findings by the Town Board for The Hills PDD, the applicant submitted an application to the Town of Southampton Planning Board for a clustered subdivision without a commercial/membership golf course. This as-of-right use involved a seasonal resort community with the same number of units (118), on-site workforce housing as required by the Planning Board, and a golf course recreational amenity for the residents of the site and their guests. The Planning Board considered the Town Board EIS "record" and reviewed additional information in the form of a SEQRA Compliance Analysis with the

EIS/Findings prepared by the Town Board for The Hills PDD. The Planning Board determined that a Supplemental EIS was not required, and that the proposed “project changes” of the Lewis Road PRD did not result in any new potential significant adverse environmental impacts that were not addressed in the EIS record. The Planning Board, as an “involved agency” in the SEQRA review for The Hills PDD, adopted their own Statement of Findings “To Approve” the project, as required in their capacity as an involved agency. The Planning Board then approved the Lewis Road PRD Preliminary Subdivision, allowing the project to move forward to the Central Pine Barrens Commission for review. This type of project with seasonal housing and a golf course is the lowest impact alternative studied in the EQGEIS and in the Hills EIS processes. The Commission is now in a position to adopt their own Statement of Findings based on the EIS record.

The Lewis Road PRD is not an increase in density – the zoning yield of the property is 118 units and under Town Zoning Law, an additional 12 workforce housing units are permitted, and in the case of the Lewis Road PRD, are required by the Town. The proposed golf course is an on-site recreational amenity for the clustered subdivision, and does not represent an increase in density.

The Lewis Road PRD golf course is permissible – the East Quogue GEIS (EQGEIS) included a complete SEQRA review in which the Commission participated. (see **Attachment A**). The recommended comprehensive plan included residential development and a golf course for this property. The Commission participated in this review and simply noted that the golf course would have to comply with the CLUP. The Group for the East End also participated in the EQGEIS and noted that the recommended golf course would need to comply with the CLUP. The Group also suggested the use of strict controls of nitrogen and pesticides and the use of organic materials in the golf course. (see **Attachment B**). The Lewis Road PRD will be governed by the ITHMP from the Hills EIS or its successor as approved by the Town of Southampton’s Planning Board, and will, per the Town Planning Board, be restricted to a strict fertilizer cap, lined greens and water quality monitoring program like the Town maintains with Sebonack and Golf at the Bridge. The golf course has been part of comprehensive planning for over 50 years including the Western GEIS. In 2018, the Town of Southampton ZBA confirmed that the golf course, as proposed for the Lewis Road PRD, is an appropriate recreational amenity and therefore, is permissible as part of the clustered subdivision.

The Lewis Road PRD will not impact groundwater – the Draft/Final EIS addressed potential impacts to groundwater in great detail. The compliance analysis completed at the Planning Board level and the analyses presented to the Commission have updated the analysis of potential impacts to groundwater. The facts are that through detailed project analyses and review, the proposed project is determined to be “net negative” in terms of nitrogen load, when factoring in the use of fertigation/irrigation. The on-site nitrogen concentration in recharge at the property line is less than 1 milligram/liter (mg/l), not including the further nitrogen load reduction of fertigation/irrigation. The proposed project includes an Integrated Turf Health Management Plan (ITHMP) that has been reviewed by the Town expert (Dr. A. Martin Petrovic, PhD) who administers golf course oversight of two other golf courses in the Town (Sebonack Golf Club and Golf at the Bridge). The Lewis Road PRD also includes Golf

Course Monitoring Protocols including lysimeters and groundwater wells that has also been reviewed by the Town expert. These measures ensure no impact related to turf management of the golf course, and have been demonstrated to be effective based on oversight of the two existing noted golf courses. The Draft/Final EIS addressed all aspects of potential groundwater contamination and found that the proposed project will not have an adverse impact.

The Lewis Road PRD is not in the “headwaters” of Weesuck Creek – the nearest wetlands associated with a west tributary to Weesuck Creek are more than 1,200 feet east of the subject site. There are two (2) topographic swales that traverse the south part of the site. These are glacial meltwater features associated with the flow of water during glacial retreat and do not represent a hydraulic connection to Weesuck Creek other than as a result of the regional groundwater flow from northwest to southeast in the direction of Weesuck Creek which is downgradient in terms of groundwater flow, from the subject site. There are no “headwaters” of Weesuck Creek associated with the Lewis Road PRD parcel.

The Lewis Road PRD will not impact surface water – the Lewis Road PRD has no surface water discharge. All stormwater resulting from the proposed project will be retained on-site, as required by Town drainage requirements. The drainage system will conform with Town requirements for design and capacity. A Stormwater Pollution Prevention Plan (SWPPP) was filed with the Town and reviewed as part of the Preliminary Subdivision approval. The SWPPP will be updated for final approval. The proposed project will incorporate erosion control measures as required by Town Engineering and SWPPP requirements. Given the distance to the nearest wetlands, lack of impact to groundwater, and no presence of nearby surface water, coupled with the lack of adverse impact to groundwater, the Lewis Road PRD will not have an impact on surface water.

The Lewis Road PRD property should not be developed – the Lewis Road PRD is located in both the Compatible Growth Area (CGA) and Core Preservation Area (CPA) of the Central Pine Barrens. The Parlato property is within a Critical Resource Area and is divided between CGA and CPA. The Hills North is entirely within the CPA, the Hills South is divided between CGA and CPA and the Kracke property. No development is allowed in the CPA. Development is allowed in the CGA, subject to the Central Pine Barrens CLUP. The subject property is privately owned and subject to real estate taxation by the Town of Southampton. There is no agreement for purchase of the property by a public entity. The subject property is zoned for residential development and the applicant intends to develop the property in conformance with the Zoning Law of the Town of Southampton and other applicable regulations including the CLUP. As a result, the applicant has the right to develop the property subject to applicable regulations.

The Lewis Road PRD has detailed plans to reduce impacts on on-site vulnerable species - the Hills DEIS and FEIS have detailed ecological plans which will be updated to reflect current NYSDEC guidance. The Town of Southampton has a condition of the Preliminary Plat approval relating to protected species. “If protected species are identified, the applicant has proposed as mitigation measures that these areas would be avoided by the site plan and/or other

options would be implemented, such as plant rescue/relocation. If transplanting is determined to be possible, a professional horticulturalist will perform the transplanting of the species to optimize survival. Transplanting of these species would be the responsibility of the applicant and would be performed under the supervision of the applicant in accordance with a protocol approved by the Town prior to the commencement of construction activities.”

The Lewis Road PRD cluster design should change – the cluster design of the Lewis Road PRD is self-evident and there is no basis for a change in design. The proposed project includes the offer of dedication of the Parlato property to the Town of Southampton. This property was purchased for its allowable yield, and preservation through cluster design. The land could have otherwise been developed as a separate parcel. The Hills North property is proposed for dedication to the Town. This land is in the CPA and therefore could not have been developed. The CPA extends 1000 feet south of Sunrise Highway into the Hills South property and this land can not be developed. The balance of property including part of the Hills South and the Kracke property are in the CGA. This is the area of the property proposed for development. The south part of the property is also the least sensitive part of the property in terms of environmental resources (lack of steep slopes and extensive disturbed areas) and surrounding development. Spinney Road, other existing residential development, a cemetery, farm fields and some open spaces are adjacent to the south part of the site. Steep slopes prevail in the central and north part of the Hills South property. As a result, the design of the property clusters development in the least sensitive parts of the site. The August 19, 2020 staff report states that “the Project conforms to this (Clustering) guideline.”

The Lewis Road PRD subdivision complies with all Town and CLUP clearing standards – the Town Aquifer Protection Overlay District (APOD) requires that the amount of disturbance of natural vegetation on the lots in the subdivision shall not exceed the percentages set forth on the table in §330-67A(4). This section does not provide for an overall clearing limitation on the entire tract. The Planning Board, however, under §330-67A(5), “may allow a greater amount of disturbance on a lot within the proposed map, provided no more than 25% of the natural vegetation on the tract shall be disturbed for development.” As previously noted, the 25% total tract clearing limitation under §330-67A(5) does not apply unless the clearing percentages on the lots cannot be obtained. The Town Planning Board has required and the Lewis Road PRD demonstrates compliance with the required clearing percentages on the individual lots. See attached Table of Lots (**Attachment C**) which demonstrates conformance to the Town APOD protection of natural vegetation requirement. Further, as noted in the NPV submissions of October 9, 2020 and November 18, 2020, the clearing plan shows that less than 25% of the natural vegetation on the tract shall be disturbed for development.

Town of Southampton, NY / Part II, General Legislation / Zoning	Next Result
Article XIII Aquifer Protection Overlay District	
Result 1 of 3 330-67 (Return to Results) (Clear Search)	
<input type="checkbox"/> § 330-67 Protection of natural vegetation.	

Lot Size (square feet)	Percentage of Site
1 to 15,000	75%
15,001 to 30,000	60%
30,001 to 60,000	50%
60,001 to 90,000	35%
90,001 to 140,000	25%
140,001 to 200,000	20%
200,001 or greater	15%

- (b) For the development of a residential tract with one single-family dwelling and its accessory structures, the amount of disturbance of natural vegetation shall not exceed the maximum percentage allowed as provided in Subsection **A(4)(a)** above for the minimum required lot area of the zoning district in which the tract lies (e.g., a tract upon which a dwelling is proposed in the CR-40 Zone would not be allowed to be disturbed in excess of 50% of 40,000 square feet). The Planning Board may modify the provisions of this subsection where the applicant has agreed to restrict the remainder of the site or portions thereof so that the burden of meeting the maximum disturbance limitation is not borne by any future lots resulting from the subdivision of the tract.
- (5) Notwithstanding the provisions of the aforementioned subsections, the Planning Board, when considering a planned residential development (cluster) subdivision of a tract within the overlay district, may allow a greater amount of disturbance on a lot within the proposed map, provided that no more than 25% of the natural vegetation on the tract shall be disturbed for development. In determining the amount of disturbance on a proposed lot, the Planning Board shall first calculate the amount of disturbance for all roads, common driveways, drainage areas, active park areas and any other improvements connected to the subdivision map and then proportionately divide the remaining area among the proposed lots.

Notwithstanding the requirements of the Town’s APOD requirements, §5.3.3.6.1 of the CLUP requires that the total site may not be cleared of its natural vegetation in excess of the percentages on Table 1-2 of the June 3, 2020 NPV submission to the CPBC titled “Maximum Clearing Allowed Under CLUP,” which is based on the zoning lot size classification of the property as of the adoption of the CLUP in 1995. In this case, the clearing restriction under the CLUP for the site as previously zoned CR-200, CR-120 and CR-80 will be no more than 28.26%. This has been confirmed by Commission staff. The Lewis Road PRD demonstrates compliance with the required total clearing percentage under the CLUP.

Table 1-2
MAXIMUM CLEARING ALLOWED UNDER CLUP
 Revised Master Plan

	Zoning in 1995	Acreage (acres)	Estimated Yield (lots) ¹	Maximum Allowed Clearing Under CLUP	
				%	acres
Hills North Parcel	CR-200	86.92	14	25	21.73
	CR-80	58.14	24	35	20.35
Hills South Parcel ²	CR-120	130.98	36	30	39.29
	CR-200	150.75	25	25	37.69
	CR-80	10.32	4	35	3.61
Kracke Property	CR-120	50.93	14	30	15.28
	CR-200	0.01	0	25	0.0025
Parlato Property ³	CR-120	69.55	19	30	20.87
	CR-200	34.13	6	25	8.53
Parlato Road Abandonment Area ⁴	CR-120	7.93	2	30	2.38
	CR-200	8.79	1	25	2.20
Total Property		608.45	145	---	171.93⁵

Notes:

- 1 Calculated as: (acreage x 43,560 x 0.75)/lot size under zoning.
- 2 Includes an additional 1.57 acres of road abandonment of Smith Road.
- 3 Includes added Timperman property (11.11 acres).
- 4 Includes 7.38 acres of additional ROW Abandonments.
- 5 Up to 28.26% clearing is allowed; based on 171.93 acres of allowable clearing.

In addition, Condition 5 of the Preliminary Subdivision approval dated 10/28/2019 includes the following: The final plat shall show the table of modified dimensional setbacks for the lots/units and shall include the amount of clearing per lot in conformance with the Aquifer Protection Overlay District and CLUP. As a result, the proposed project is fully in compliance with the Town’s requirements under the APOD.

The scope of Commission review is to determine conformity with the Standards and Guidelines of the CLUP. The Commission has sufficient information to make this determination based on the applicant’s detailed submissions and affirmative information demonstrating conformance. The applicant’s response to the August 19, 2020 Staff Report provides an excellent summary of the conformity of the project with the Standards and Guidelines. The project Staff Report for the August 19, 2020 meeting indicated conformity with most of the Standards and Guidelines, leaving only a few for further assessment. Since that time, the plan has been further improved as was presented at the November 18, 2020 hearing. The Staff Report for the November 18, 2020 hearing reaffirmed conformance with most Standards and Guidelines, and continued to identify several Standards/Guidelines for further assessment by the Commission. In fact, all of these have been addressed by the applicant in prior submissions and at the November 18, 2020 hearing.

The following provides a summary of the Standards and Guidelines and further addresses those where staff has identified that more information is needed.

Comprehensive Land Use Plan Standard or Guideline	Review
Standard 5.3.3.1.1 Suffolk County Sanitary Code Article 6 compliance	Staff Report for 8/19/2020 meeting indicates conformance once SCDHS approves. SCDHS is waiting on Commission determination before approval. This is complete and found to conform.
Standard 5.3.3.1.2 Sewage treatment plant discharge	Staff Report for 8/19/2020 indicates: "Absent the County or State input, in accordance with this Standard, the Project will conform. This is complete and found to conform.
Guideline 5.3.3.1.3 Nitrate-nitrogen goal [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]	This goal pertains to development near ponds and wetlands. This is not applicable to this project although this goal is easily met by the project. The project is one-tenth the limit of the CLUP for this Standard, albeit not applicable to the project. The project conforms.
Standard 5.3.3.2.1 Suffolk County Sanitary Code Articles 7 and 12 compliance.	Staff Report of 8/19/2020 indicates: "The Project will conform if the SCDHS review is satisfied and SCDHS issues its approval." SCDHS awaits Commission approval. This is complete and found to conform.
Standard 5.3.3.2.1 Significant discharges and public supply well location	Staff Report of 8/19/2020 indicates: "Project will conform." This is complete and found to conform.
Guideline 5.3.3.3.2 Private well protection	Staff Report of 8/19/2020 indicates: "Project will conform." This is complete and found to conform.
Standard 5.3.3.4.1 through 5.3.3.4.4 Wetlands and Surface Waters	Staff Report of 8/19/2020 indicates this is not applicable.
Standard 5.3.3.5.1 Stormwater Recharge	Staff Report of 8/19/2020 indicates: "Project will conform." This is complete and found to conform.
Guideline 5.3.3.5.2 Natural recharge and drainage [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]	Natural recharge areas are used wherever possible. Drainage design minimizes disturbance of native vegetation. No "recharge basins" are proposed. Ponds used for drainage are located in existing cleared areas. Drainage reserve area acreage provided in applicant response to 11/18/2020 meeting Staff Report. Project must be found to conform based on strict review of the language of the Guideline.
Guideline 5.3.3.5.3 Ponds [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]	Ponds are proposed to accommodate stormwater runoff, not solely for aesthetic purposes. Project must be found to conform based on strict review of the language of the Guideline.
Guideline 5.3.3.5.4 Natural topography in lieu of recharge basins	The proposed project uses natural swales and depressions where possible, and no excavated recharge basins are proposed. Project must be found to conform based on strict review of the language of the Guideline.
Guideline 5.3.3.5.5 Soil erosion and stormwater runoff	This Guideline indicates: During construction, the standards and guidelines promulgated by NYSDEC, which are designed to prevent erosion and control stormwater, should be adhered to. Construction has not begun and cannot until all approvals are secured. The Town ensures soil erosion

	<p>and stormwater runoff controls through Final Subdivision approval, erosion and sediment control plans and a SWPPP, and once confirmed by the Town, the SWPPP is filed with NYSDEC. These measures will be in place as a requirement of the Town. The Town cannot act until Commission approval. Project must be found to conform based on strict review of the language of the Guideline and the sequence of project approvals.</p>
<p>Standard 5.3.3.6.1 Vegetation Clearance Limits</p>	<p>The Staff Report for the 8/19/2020 meeting indicates: “The Project will confirm to the Standard if clearing does not exceed 171.83 acres including 31.5 acres currently cleared. Therefore, a maximum of 140.43 acres of existing natural vegetation can be cleared for the Project.” The project will conform as outlined in the Staff Report. In addition, the project will retain additional natural vegetation to comply with the Town’s APOD requirement by including the table of modified dimensional setbacks for the lots/units including the amount of clearing per lot in conformance with the APOD and CLUP. Project conformity has been demonstrated. Any additional Town restrictions will show conformance in the Final Plan as required by the Town.</p>
<p>Standard 5.3.3.6.2 Unfragmented open space [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]</p>	<p>The proposed project will offer the dedication of all of the Parlato Property and the Hills North Parcel to the Town. These areas total 207.32 acres. An additional 195.56 acres will be administered by the project’s HOA and preserved through conservation easements. Approximately 135 of the 195.56 acres administered by the HOA are on the northern part of Hills South Parcel, contiguous with adjacent preserved area. This, along with the Hills North Parcel and Parlato Property preserves 86% of the open space outside of the development area in large contiguous blocks. The staff report dated August 19, 2020 noted the vast majority of the open space will remain in large blocks. Additional contiguous open space is provided adjoining golf holes and within lots and meets the Vegetation Clearance Limits. Project conformity has been demonstrated.</p>
<p>Standard 5.3.3.6.3 Fertilizer-dependent vegetation</p>	<p>Staff Report of 8/19/2020 indicates: “Project will conform.” This is complete and found to conform.</p>
<p>Standard 5.3.3.6.4 Native plantings</p>	<p>Staff Report of 8/19/2020 indicates: “Project will conform.” This is complete and found to conform.</p>
<p>Standard 5.3.3.7.1 Special species and ecological communities</p>	<p>Staff Report of 8/19/2020 indicates project will conform if clearing adheres to NYSDEC guidance. The project will comply with the most current NYSDEC species protection requirements. The applicant will coordinate conservation management with the Town of Southampton during the Final Plat review process. Based on the Staff Report, this is complete and the project conforms.</p>

<p>Guideline 5.3.3.8.1 Clearing envelopes [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]</p>	<p>The Guideline reads: Clearing envelopes should be placed upon lots within a subdivision so as to maximize the placement of those envelopes on slopes less than ten percent (10%).” The project ensures that clearing envelopes maximize placement on slopes of less than 10% by design. Roads and homesites avoid slopes greater than 10% to the maximum extent. Slopes greater than 10% total 177.99 acres on the overall site. Disturbance of such areas involves 6.72 acres and thus maximizes avoidance. Conformity is demonstrated.</p>
<p>Guideline 5.3.3.8.2 Stabilization and erosion control</p>	<p>Staff Report of 8/19/2020 indicates: “The Project will conform if technical review is approved by the Town.” This is complete and found to conform through such review.</p>
<p>Guideline 5.3.3.8.3 Slope Analysis</p>	<p>Staff Report of 8/19/2020 indicates: “The Project conforms to this Guideline.” This is complete and found to conform.</p>
<p>Guideline 5.3.3.8.4 Erosion and sediment control plans [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]</p>	<p>This Guideline indicates: “Erosion and sediment control plans should be required in areas of fifteen percent (15%) or greater slopes.” Erosion and sediment control plans are required per Condition 3 of the Town of Southampton Planning Board Preliminary Subdivision approval. Town engineering review of the Final Subdivision will ensure conformance. The proposed project previously proposed disturbance of 6.23 acres on slopes 15% or greater. The updated plans will disturb 1.30 acres of natural slopes greater than 15%, and 0.99 acres of previously disturbed slopes greater than 15%. Project must be found to conform based on strict review of the language of the Guideline.</p>
<p>Guideline 5.3.3.8.5 Placement of roadways [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]</p>	<p>This Guideline states: “Roads and driveways should be designed to minimize the traversing of slopes greater than ten percent (10%) and to minimize cuts and fills.” Updated plans remove homesites, roads and driveways from all steep slope areas on the north part of the. The only areas where there is any disturbance to natural steep slopes associated with a road or driveway is the south part of the site where two roads traverse a very limited areas of slopes greater than 10%. These areas are approximately 0.38 acres. All road/driveway disturbance on slopes greater than 10% is minimized, as are cuts/fills. Project must be found to conform based on strict review of the language of the Guideline.</p>
<p>Guideline 5.3.3.8.6 Retaining walls and control structures</p>	<p>This Guideline states: “Details of retaining walls and erosion control structures should be provided for roads and driveways which traverse slopes greater than ten percent (10%).” The two minimal areas where roads or driveways traverse greater than 10% slopes are not anticipated to require retaining walls. Grade transitions are depicted on grading plans using slopes of 1:3 or less. Project must be</p>

	found to conform based on strict review of the language of the Guideline.
Standard 5.3.3.9.1 Receiving entity for open space dedications	Staff Report of 8/19/2020 indicates: “The Project conforms to this Guideline.” This is complete and found to conform.
Guideline 5.3.3.9.2 Clustering	Staff Report of 8/19/2020 indicates: “The Project conforms to this Guideline.” This is complete and found to conform.
Guideline 5.3.3.9.3 Protection of dedicated open space	Staff Report of 8/19/2020 indicates: “The Project will conform if adequate restrictions are in place in the HOA.” C&Rs/Conservation Easements will be used to provide adequate restrictions for HOA open space. This is complete and found to conform.
Guideline 5.3.3.10.1 Best Management Practices	Not applicable. No agricultural uses.
Guideline 5.3.3.11.1 Cultural resource consideration [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]	This Guideline provides five (5) types of cultural resources for consideration in review and to provide protection. 1) there are no established recreational/educational trails; 2) there are no active recreation sites; 3) Sunrise Highway is protected by buffers of greater than 2,500’ depth; 4) there are no historical or culturally significant sites; and 5) there are no sensitive archaeological resources. As noted in the applicant’s 8/19/2020 submission, land to the east is a former Town Dump and trails are not frequently used or easily accessed. Prior use involved ATV/dirt bike access through the Lewis Road PRD site to use these trails; this has been discontinued as a result of the applicant’s efforts in coordination with the Town. Commission staff should walk the trail as it is evident that there is a berm and vegetation between the development and the trail that provides substantial screening, and buffers proposed on the Lewis Road PRD site are adequate. Project must be found to conform based on strict review of the language of the Guideline, field conditions and project design.
Guideline 5.3.3.11.2 Inclusion of cultural resources in applications [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]	As noted above, there are no established recreational/educational trails; there are no active recreation sites; Sunrise Highway is protected by buffers of greater than 2,500’ depth; there are no historical or culturally significant sites; and there are no sensitive archaeological sites. As noted in the 8/19/2020 Staff Report, the Town of Southampton Planning Board (the local municipality) concluded that there is no impact to any of the identified resources. Project must be found to conform based on strict review of the language of the Guideline.
Guideline 5.3.3.11.3 Protection of scenic and recreational resources [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]	This Guideline states: “Protection measures for scenic and recreational resources should include, but not be limited to, retention of visually shielding natural buffers, replacement of degraded or removed natural visual buffers using native species, use of signs which are in keeping in both style and

	<p>scale with the community character, and similar measures.” The 8/19/2020 and 11/18/2020 Staff Reports question buffers as regards project visibility. Commission staff should traverse the land to the east, as there is physical separation, berms and vegetation intervening between developed areas of the site and trails. The proposed project includes shielding natural buffers, and has resulted in improvement of lands and buffers by limiting ATV access and promoting re-growth of native species. All signs will be in keeping with the style and scale of community character. The 8/19/2020 and 11/18/2020 Staff Reports question buffers as regards project visibility. Project must be found to conform based on strict review of the language of the Guideline.</p>
<p>Guideline 5.3.3.11.4 Roadside design and management [highlighted in Staff Report for 8/19/2020 and 11/18/2020 meetings]</p>	<p>This Guideline states: “Undisturbed portions of the roadside should be maintained in a manner that protects the scenic features of these areas. Clearing (including that for aisles, driveways, access and parking) is not precluded within these roadside areas, provided that appropriate buffers are maintained, and that manmade structures meet standards consistent with the character of the area.” The 8/19/2020 and 11/18/2020 Staff Reports question project visibility. The Guideline refers to “undisturbed portions of the roadside.” The only “undisturbed” roadside is Sunrise Highway and the project is not visible from that vantage point. Any other areas where the project may be visible from are not undisturbed roadsides; however, the project will be setback from all roads and/or maintain appropriate buffers, and all structures will be consistent with the character of the area. Project must be found to conform based on strict review of the language of the Guideline.</p>
<p>Standard 5.3.3.12.1 Commercial and industrial compliance with Suffolk County Sanitary Code</p>	<p>Pending SCDHS approval. The SCDHS is waiting on the Commission determination before providing its approval. There are no outstanding questions in Staff Reports from 8/19/2020 and 11/18/2020 and therefore the project is found to be in conformance with this Standard.</p>

A complete review of all Standards and Guidelines is contained in the record and summarized above. It is important to review the strict language of the Standards and Guidelines in order to determine project conformance. The applicant has provided affirmative information regarding how and why the project conforms to the Standards and Guidelines of the CLUP. All outstanding staff and/or Commission comments have been addressed. No contrary findings have been identified to date that would lead to a conclusion other than project conformity. The summary above assists in this review and leads to the conclusion that the project conforms with all of the Standards and Guidelines of the CLUP.

Thank you for the opportunity to provide you with this information to assist your review of the pending Lewis Road PRD before the Commission.

Very truly yours,

NELSON, POPE & VOORHIS, LLC



Charles J. Voorhis, CEP, AICP
Partner

cc: Carrie Meek Gallagher, CPBC chair
John Pavacic, CPBC, Executive Director
John Milazzo, Esq., CPBC counsel
Mark Hissey, DLC
Wayne Bruyn, Esq., DLC counsel

Attachments:

Attachment A – EQGEIS; Commission Letter to Southampton Town; 5/14/2008
Attachment B – EQGEIS; GEE Letter to Southampton Town; 5/12/2008
Attachment C – Table of Lot Clearing; Lewis Road PRD

ATTACHMENTS

ATTACHMENT A
EQGEIS; COMMISSION LETTER TO
SOUTHAMPTON TOWN; 5/14/2008

DRAFT

May 14, 2008



Jefferson V. Murphree, AICP
Town Planning and Development Administrator
Town of Southampton
Town Hall
116 Hampton Road
Southampton, New York 11968

Re: East Quogue Draft Generic Environmental Impact Statement (GEIS)

Peter A. Scully
Chair

Dear Mr. Murphree:

Phillip J. Cardinale
Member

The Commission is in receipt of the East Quogue Draft GEIS. Commission Staff has prepared comments on the document for review by the Commission. The Town must demonstrate two things before adopting the proposed code amendments. First, the Town must demonstrate that the proposed code amendments are not substantially inconsistent with the Long Island Pine Barrens Protection Act of 1993 and the Central Pine Barrens Comprehensive Land Use Plan (CLUP). Second, the impacts of the proposed code amendments and their consistency with the CLUP must be analyzed. See 6 NYCRR 617.9(b)(5)(iii)(h).

Brian X. Foley
Member

Linda A. Kabot
Member

Steve A. Levy
Member

To facilitate such review the Commission offers the following comments on the Recommended Plan proposed in the DGEIS. No comments are included for Chapter 4, Alternatives. The comments are organized in the following categories.

- A. Comments on Chapter 3, Recommended Plan and Impact Analysis
- B. Comments on the Executive Summary and Chapters 1 and 2
- C. General Comments

A. Comments on Chapter 3, Recommended Plan and Impact Analysis

1. The DGEIS must demonstrate that the proposed rezoning actions comply with the CLUP, specifically Chapter 5, Standards and Guidelines for Land Use and Chapter 6, Pine Barrens Credit Program. Pursuant to Chapter 6 of the CLUP:

“Each Town shall include enough absorption capacity in receiving districts that meet the as of right definition set forth in Section 6.4 of this Plan so as to absorb all of the Pine Barrens Credits on a one to one (1:1) ratio that the Commission estimates it may allocate in that town pursuant to this Plan. The Commission recognizes that a change in zoning upon a town board's own motion that would decrease the receiving capacity so as to reduce this ratio below 1:1 would have an adverse effect on the Pine Barrens Credit program.”

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0587

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The CLUP analyzed a specific build out capacity for the Town based on the Town zoning in 1995. Any proposed deviation from the DEIS analysis that formed the basis of the adopted CLUP, particularly proposed increases in density on a project site (e.g., Planned Development Districts (PDDs)), shall be required to utilize and redeem pine barrens credits or transfer of development rights (TDRs) for such

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requests to increase density and/or intensity for all land uses (residential, commercial, industrial, etc.). Compliance with the CLUP must be demonstrated for all rezoning scenarios to avoid potential adverse cumulative impacts on the CLUP, including, but not limited to, maintenance of the ratio of receiving area to sending area capacity as outlined in CLUP Chapter 6, Pine Barrens Credit Program.

It is recommended that the Town develop a rationale that can be applied to any PDD scenario. This would provide the applicant with a methodology to prepare a baseline estimate of the minimum number of Pine Barrens Credits that would be required for redemption in connection with a PDD.

2. Provide a matrix of the existing and proposed zoning of parcels in each Recommend Area.
3. Refer to the existing and the proposed zoning districts of the parcels discussed in the "Land Use Recommendations" section.
4. Recommendation Area 1

This Recommendation states, "*Lands that are currently actively sand mined could either renew their mining permit or be restored for a mix of ecological uses and utilized as a recreation/resort use (approximately 203 acres).*" Proposals for the redevelopment of existing sand mines shall be subject to review and compliance with ECL Article 57 and the CLUP. Projects that propose an increase in density and/or intensity shall be required to redeem Pine Barrens Credits to ensure continued compliance with the CLUP's receiving area requirements.

5. Recommendation Area 3
 - a. This Recommendation proposes the rezoning of properties currently zoned LI-200, CR-80 and CR-120 to the CR-200 Zoning District. Although this is an action to upzone, the GIES shall, nonetheless, demonstrate compliance with CLUP Chapter 6, including maintenance of the sending to receiving credit ratio requirement.
6. Recommendation Area 6
 - a. This Recommendation Area proposes the rezoning of 27 acres in the CR-200 Zoning District to a Light Industrial (LI) Zoning District. This rezoning action would result in potential adverse impacts on the CLUP Standards and Guidelines. For example, the DGEIS does not demonstrate compliance with clearing limits listed in the CLUP (Chapter 5, Table 5-1) as a result of rezoning. Clearing on a CR-200 parcel is less than that permitted to be cleared on a parcel in the Light Industrial (LI) Zoning District. Revise to demonstrate proposed rezoning actions comply with the CLUP. The analysis should be submitted for review prior to a final decision on this Recommendation.
 - b. The proposed zone change from CR-200 to Light Industrial, which would facilitate the construction and development of an industrial land use on the site, situates incompatible land uses and is incongruous in proximity to the Core Preservation Area and an existing SCWA wellfield property.
 - c. Demonstrate compliance with the CLUP Pine Barrens Credit Program one to one receiving capacity to sending credit ratio requirement (1:1 is the minimum ratio required).

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7. Recommendation Area 7

- a. Recommendation Area 7 encompasses approximately 295 acres and includes the following proposed development actions including mixed uses and rezoning forPDD(s):
- Construction of 90 residential dwelling units on 170 acres.
 - Construction of a private golf course on 125 acres; 23 acres of the golf course “assume use of Town-owned property that could provide a buffer area between fairways.”
 - Construction of a banquet/conference center on 13 acres of the golf course.

The golf course and other developments in this Recommendation Area would be required, at a minimum, to comply with the CLUP Standards and Guidelines.

- b. Demonstrate compliance with the CLUP Pine Barrens Credit Program one to one receiving capacity to sending credit ratio requirement. Consider redemption of pine barrens credits or Town TDRs.

8. Recommendation Areas 8, 10, 11

- a. This Recommendation Area proposes the rezoning of 53 acres from CR-120 to CR-200 and construction of 22 dwelling units. The development area is north of the LIRR tracks. This rezoning action would be required to comply with the CLUP Standards and Guidelines.
- b. Consistent with the CLUP, it is recommended that the Town consider a Cluster Plan for subdivisions to protect unfragmented open space in the Compatible Growth Area.
- c. Demonstrate compliance with the CLUP Pine Barrens Credit Program one to one receiving capacity to sending credit ratio requirement.

9. Recommendation Area 9

- a. Demonstrate that the proposed action(s) under this Recommendation comply with the CLUP, including thePine Barrens Credit Program one to one receiving capacity to sending credit ratio requirement.

B. Comments on the Executive Summary and Chapters 1 and 2

Executive Summary

1. Pg S-1. The GEIS states, “About 365 acres of the study area are in the Central Pine Barrens Core Preservation Area and are therefore preserved.” Revise this statement to clarify whether the referenced 365 acres in the Core is currently preserved. The Pine Barrens Act through implementation of the CLUP aims to redirect development from the Core to the CGA and other areas more compatible with development. Owners of property in the Core may submit hardship applications to the Commission for review and consideration; they may also request a Letter of Interpretation (LOI) to determine the pine barrens credit allocation for the property owned in the Core to transfer development rights from the Core to other areas.

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2. Scenic Resources. Confirm consistency with the Town Master Plan (e.g., Scenic Corridors) and CLUP Volume 2, Chapter 8, Scenic Resources.
3. Estimate the approximate cumulative amount of vegetation removal due to clearing under the current zoning of parcels in the CGA and Core vs. the amount in the Recommended Plan and the Up-Zone Alternative.
4. Pg S-22, "Hamlet Transfer of Development Rights Alternative." Revise to clarify that the yield would be based on the zoning of the parcel in 1995, when the CLUP was adopted.

Chapter 1, Project Background

1. Figure 1-4. Revise this Figure with different colors to distinguish the Core Preservation Area and Critical Resource Area (CRA).
2. Pg 1-17, Table 1-4. Revise to indicate the credit factor will be based on the zoning of the parcel in 1995.
3. Pg 1-18. Reference the Town Code Chapter 247, Open Space (e.g., §247-8(H)), which requires a minimum amount of open space to be shown on a Planned Residential Development (PRD) Plan (aka Cluster Plan).

Chapter 2, Existing Conditions

1. Similar to Figure 2-1, provide the acreage and percentage of land in each zoning district and the acreage and percentage of land that remains vacant and developable in the CGA and the Core.
2. Avian Habitat and Species, Page 2-43. A central component of the Act was the protection of ecosystems. The East Quogue area was studied in detail in the Town's Western GEIS. A reference to the Western GEIS may be informative. Reference the Western GEIS, which provided a discussion of the existing forest interior avian species and the forest interior habitat in the area.
3. Slope easement/protection. Include reference to Town Code Chapter 292, Subdivision Regulations, Section 292-10(B)(5)), which excludes areas such as steep slopes that contribute to lot yield and compliance with CLUP Guidelines under Section 5.3.3.8 Soils. Subdivision and development of parcels in the study area would be subject to this regulation, which states:

"Horizontal areas of slopes which exceed a grade of 20% when considered for lots of less size than 40,000 square feet or a grade of 30% when considered for lots of less size than 80,000 square feet."
4. Scenic and Historic Resources, pgs 2-60 through 2-63. Include reference to compliance with CLUP Guideline 5.3.3.11, Protection of scenic, historic, and cultural resources.

C. General Comment on Compliance with the CLUP

1. The DGEIS should provide a discussion of compliance with ECL Article 57 and the Central Pine Barrens Comprehensive Land Use Plan (CLUP), specifically Chapter 5 (Standards and Guidelines for Land Use) and Chapter 6 (Pine Barrens Credit Program). Identify any potential significant adverse impacts on the CLUP, and confirm that the

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Town's implementation of the DGEIS will result in continued compliance with the CLUP.

2. Develop a standard methodology (e.g., redemption schedule that captures mixed uses) to prepare a preliminary calculation of the baseline minimum number of pine barrens credits and/or Town TDRs warranted for redemption in a PDD scenario that includes proposed increases in density and/or intensity of use(s), specifically mixed uses (various housing types, commercial uses, etc.).

If you have any questions, please contact me at (631) 218-1192.

Sincerely,

Julie E. Hargrave
Environmental Planner

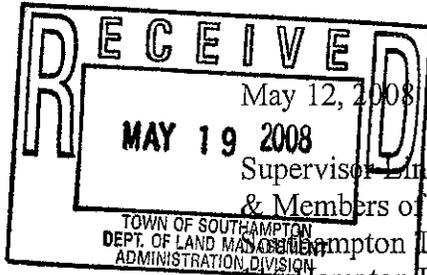
cc. Raymond Corwin, Executive Director, CPBJPPC
Judy Jakobsen, Principal Environmental Analyst, CPBJPPC
John Milazzo, Esq., Counsel to the Commission
Marty Shea, Chief Environmental Analyst, Town of Southampton

ATTACHMENT B
EQGEIS; GEE LETTER TO
SOUTHAMPTON TOWN; 5/12/2008

GROUP FOR THE EAST END

→ Town Clerk

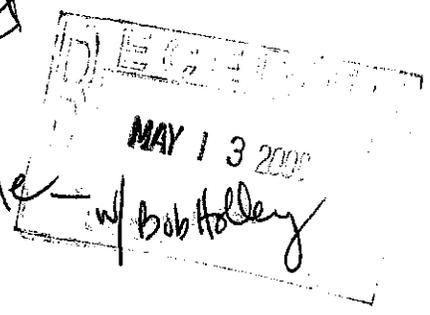
Post Office Box 569
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Bridgehampton, NY 11932-0569
Tel: 631.537.1400
Fax: 631.537.2201
www.groupfortheeastend.org



May 12, 2008
Supervisor Linda A. Kabot
& Members of the Town Board
116 Hampton Road
Southampton, NY 11968

EIGGEIS

✓ see land report
✓ also file



President
Robert S. DeLuca

Chairman
William S. McChesney, Jr.

Vice Chairman
Ann Colley

Board Members
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Lionel Pincus
John Sargent
James Trees
Harold M. Wit

Re: Comments – East Quogue Draft Generic Environmental Impact Statement

Dear Supervisor Kabot & Members of the Board,

On behalf of Group for the East End, I would like to provide the following comments and recommendations regarding the East Quogue Draft Generic Environmental Impact Statement (DGEIS). Additionally we would like to express our thanks for the Board's continuous support for the moratorium while the most appropriate long-term planning strategy is created.

In general we believe that the recommendations set forth within the East Quogue Draft Generic Environmental Impact Statement form a reasonable beginning point, that will guide the Town's long-term comprehensive planning process for this important part of East Quogue.

In brief, the DGEIS took into account critical natural areas, strongly valued the necessity of preserving agricultural land, and specifically tackled the issue of density and reasonable standards for growth.

However, we feel that throughout the document, a higher level of specificity is needed to accurately convey the planning and zoning recommendations set forth. Provided below are specific additional points to be examined.

- The Final Environmental Impact Statement should include a chart that provides a **parcel-by-parcel** comparison of what is currently being proposed on the study area's large land parcels versus each of these parcel's "as of right" development potential.
- The document should also compare the "as of right" development potential of the study's large land parcels to the recommended densities

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defined in the Recommended Plan. This chart should be as comprehensive as possible, including components such as open space, density, water usage and school district populations. (The following tables are deficient in providing specific breakdowns: Table S-1 on page S-3, Table 4-8 on page 4-15 and Table 4-6 on page 4-11).

- **Recommendation Area 12** (page 3-4) suggests the re-zoning of the Turtle Bay property. Please provide further details regarding the future plans and the justification for this recommendation.
- The “resort/recreation” use, described in the Recommended Plan (page 3-2) for the East Coast Mining and Sand Farm Corp. (totaling 203 acres) needs to be further defined. Allowable uses and a description of the desired type of recreation should be further defined. Further, Chapter 1 states that the sand mining operations will expire in 2010. Has there been inquiry into the possibility of the continuation of mining operations past 2010?
- **Recommendation Area 7** recommends the construction of a golf course. Due to the parcel’s location within the Central Pine Barrens Compatible Growth Area, considerable restrictions will be applied to the site in terms of clearing and fertilizer use. If permitted, ideally the golf course should strive to implement strict controls on nitrogen and pesticides and follow an “organic” management protocol.
- The Recommended Plan calls for trail creation. A detailed trail plan should be developed in order to definitively identify specific trails. The Trails Advisory Board should provide input. This will also act as an aide to the Planning and Town Boards as they review development proposals.
- The Recommended Plan heavily promotes the use of TDRs however, does not provide a sufficient analysis that would determine the feasibility of utilizing TDRs given the Suffolk County Department of Health Services regulations. Please provide additional detail and hard figures illustrating a **parcel-by-parcel** sewage and septic analysis.
- The Recommended Plan does not offer any recommendations regarding the issue of affordable housing. Given the current significance of this issue in community planning generally, we believe there should be a discussion of affordable housing issues, impacts, and possible options or restrictions for further consideration. In the absence of any defined

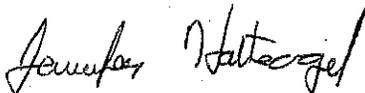


policies or guidance on this issue, the community will be left to address any future proposals on a case-by-case basis.

In addition to the above request, we respectfully recommend that a significantly more detailed **action plan (page S-10)** be provided in the FGEIS in order to fully understand the planning processes that lie ahead. Moreover, we fully support the Board moving ahead to implement and codify the recommendations as swiftly as possible to protect the integrity of East Quogue.

Thank you for reviewing this critical matter. If you have any questions or comments please feel free to contact me at your convenience. I can be reached at (631) 537-1400 ext. 21 or at jhartnagel@eastendenvironment.org.

Sincerely,


Jenn Hartnagel
Environmental Advocate

ATTACHMENT C

TABLE OF LOT CLEARING

LOT No.	Lot Area (SQ FT)	Max. allowable Lot clearing percentage	Max. allowable Lot clearing (SQ FT)	Min. Lot preserved area (SQ FT)
1	14,055	75.00%	10,541.25	3,513.75
2	12,026	75.00%	9,019.50	3,006.50
3	9,792	75.00%	7,344.00	2,448.00
4	10,953	75.00%	8,214.75	2,738.25
5	26,303	60.00%	15,781.80	10,521.20
6	11,963	75.00%	8,972.25	2,990.75
7	10,599	75.00%	7,949.25	2,649.75
8	10,500	75.00%	7,875.00	2,625.00
9	10,500	75.00%	7,875.00	2,625.00
10	10,500	75.00%	7,875.00	2,625.00
11	10,500	75.00%	7,875.00	2,625.00
12	10,693	75.00%	8,019.75	2,673.25
13	18,615	60.00%	11,169.00	7,446.00
14	19,714	60.00%	11,828.40	7,885.60
15	21,017	60.00%	12,610.20	8,406.80
16	15,647	60.00%	9,388.20	6,258.80
17	19,258	60.00%	11,554.80	7,703.20
18	20,146	60.00%	12,087.60	8,058.40
19	20,545	60.00%	12,327.00	8,218.00
20	18,792	60.00%	11,275.20	7,516.80
21	16,462	60.00%	9,877.20	6,584.80
22	19,059	60.00%	11,435.40	7,623.60
23	14,986	75.00%	11,239.50	3,746.50
24	14,841	75.00%	11,130.75	3,710.25
25	20,042	60.00%	12,025.20	8,016.80
26	14,717	75.00%	11,037.75	3,679.25
27	15,190	60.00%	9,114.00	6,076.00
28	14,179	75.00%	10,634.25	3,544.75
29	13,642	75.00%	10,231.50	3,410.50
30	13,839	75.00%	10,379.25	3,459.75
31	14,551	75.00%	10,913.25	3,637.75
32	29,286	60.00%	17,571.60	11,714.40
33	24,322	60.00%	14,593.20	9,728.80

34	12,909	75.00%	9,681.75	3,227.25
35	13,735	75.00%	10,301.25	3,433.75
36	19,272	60.00%	11,563.20	7,708.80
37	12,301	75.00%	9,225.75	3,075.25
38	8,400	75.00%	6,300.00	2,100.00
39	8,400	75.00%	6,300.00	2,100.00
40	13,396	75.00%	10,047.00	3,349.00
41	8,400	75.00%	6,300.00	2,100.00
42	8,400	75.00%	6,300.00	2,100.00
43	8,804	75.00%	6,603.00	2,201.00
44	9,748	75.00%	7,311.00	2,437.00
45	9,207	75.00%	6,905.25	2,301.75
46	8,997	75.00%	6,747.75	2,249.25
47	15,203	60.00%	9,121.80	6,081.20
48	9,878	75.00%	7,408.50	2,469.50
49	13,503	75.00%	10,127.25	3,375.75
50	11,798	75.00%	8,848.50	2,949.50
51	9,100	75.00%	6,825.00	2,275.00
52	9,826	75.00%	7,369.50	2,456.50
53	10,034	75.00%	7,525.50	2,508.50
54	9,262	75.00%	6,946.50	2,315.50
55	8,405	75.00%	6,303.75	2,101.25
56	7,405	75.00%	5,553.75	1,851.25
57	6,548	75.00%	4,911.00	1,637.00
58	6,901	75.00%	5,175.75	1,725.25
59	8,066	75.00%	6,049.50	2,016.50
60	6,000	75.00%	4,500.00	1,500.00
61	6,000	75.00%	4,500.00	1,500.00
62	6,000	75.00%	4,500.00	1,500.00
63	6,000	75.00%	4,500.00	1,500.00
64	6,246	75.00%	4,684.50	1,561.50
65	7,719	75.00%	5,789.25	1,929.75
66	5,097	75.00%	3,822.75	1,274.25
67	5,088	75.00%	3,816.00	1,272.00
68	5,088	75.00%	3,816.00	1,272.00
69	5,088	75.00%	3,816.00	1,272.00
70	5,088	75.00%	3,816.00	1,272.00

71	11,358	75.00%	8,518.50	2,839.50
72	5,046	75.00%	3,784.50	1,261.50
73	5,168	75.00%	3,876.00	1,292.00
74	10,637	75.00%	7,977.75	2,659.25
75	8,161	75.00%	6,120.75	2,040.25
76	8,476	75.00%	6,357.00	2,119.00
77	8,476	75.00%	6,357.00	2,119.00
78	16,988	60.00%	10,192.80	6,795.20
79	17,484	60.00%	10,490.40	6,993.60
80	9,161	75.00%	6,870.75	2,290.25
81	9,152	75.00%	6,864.00	2,288.00
82	9,649	75.00%	7,236.75	2,412.25
83	10,448	75.00%	7,836.00	2,612.00
84	18,827	60.00%	11,296.20	7,530.80
85	12,716	75.00%	9,537.00	3,179.00
86	23,269	60.00%	13,961.40	9,307.60
87	13,873	75.00%	10,404.75	3,468.25
88	13,112	75.00%	9,834.00	3,278.00
89	13,108	75.00%	9,831.00	3,277.00
90	15,280	60.00%	9,168.00	6,112.00
91	12,092	75.00%	9,069.00	3,023.00
92	11,819	75.00%	8,864.25	2,954.75
93	20,275	60.00%	12,165.00	8,110.00
94	20,649	60.00%	12,389.40	8,259.60
95	23,639	60.00%	14,183.40	9,455.60
96	24,089	60.00%	14,453.40	9,635.60
97	28,097	60.00%	16,858.20	11,238.80
98	28,950	60.00%	17,370.00	11,580.00
99	27,564	60.00%	16,538.40	11,025.60
100	30,000	60.00%	18,000.00	12,000.00
101	30,000	60.00%	18,000.00	12,000.00
102	30,000	60.00%	18,000.00	12,000.00
103	30,000	60.00%	18,000.00	12,000.00
104	23,640	60.00%	14,184.00	9,456.00
105	27,641	60.00%	16,584.60	11,056.40
106	30,000	60.00%	18,000.00	12,000.00
107	30,000	60.00%	18,000.00	12,000.00

108	11,302	75.00%	8,476.50	2,825.50
109	10,677	75.00%	8,007.75	2,669.25
110	11,496	75.00%	8,622.00	2,874.00
TOTAL SQ FT	1,560,865		1,045,359	515,506
Total acreage	36		24	12