

March 24, 2020

Ms. Carrie Meek-Gallagher
Chairperson
New York State Central Pine Barrens Joint Policy & Planning Commission
624 Old Riverhead Road
Westhampton Beach, NY 11978

RE: Lewis Road Planned Residential Development

Dear Chairperson Gallagher:

The Seatuck Environmental Association (Seatuck) is a Long Island based not-for-profit wildlife conservation whose mission is to protect wildlife species and populations native to Long Island and safeguard the marine, estuarine, and terrestrial habitats upon which they depend.

Seatuck has had very limited involvement in issues relating to the preservation of the Long Island Pine Barrens, Long Island's premier ecosystem. We have not commented on the CLUP and its amendments, general stewardship issues, or commented on specific projects. However, we felt compelled to analyze and assess the above-referenced project given its size and scope (involving more than 500 acres) and after a thorough and careful review of all the relevant information - including the Commission staff report, all exhibit materials, and the hearing transcript - we feel further compelled to express our concern about the above-referenced project since this review led us to conclude: 1) the project will have numerous significant, collective adverse environmental impacts to the species, natural communities, and ecosystem processes of the Pine Barrens; 2) is inconsistent with the goals of the Pine Barrens Comprehensive Land Use Plan (CLUP) as elaborated upon below, and 3) whose approval would set a dangerous and undesirable precedent. After conducting this review, we fully understand and appreciate the decision of the Central Pine Barrens Joint Policy & Planning Commission to assert jurisdiction over the project and we respectfully recommend the Commission disapprove the Lewis Road Planned Residential Development project.

It is our understanding that in order for the Commission to approve this project it must comply with each and every one of the approximately dozen and a half land use standards and guidelines enumerated in the CLUP. While it is clear from our review, and the review of other parties, that the project does not comply with many of these standards and guidelines, I'd like to illustrate this non-compliance by focusing on one land use standard and one land use guideline - Standard 5.3.3.6.2 relating to Unfragmented Open Space and Guideline 5.3.3.9.2 relating to Clustered Development.

The Land Use Standard relating to Unfragmented Open Space is designed to ensure that the open space components of a project are as continuous, contiguous, and coherent as possible, (generally quantified by measuring the perimeter to area ratio of the open space; the lower the ratio the more it conforms with the spirit of this Standard) while keeping small and isolated open space areas to a minimum. This standard is based on both sound and general principles of landscape ecology and the specific ecological

characteristics and processes of the Long Island Pine Barrens which includes habitat and size requirements of key species as well as the role of periodic wildfire.

Small, thin, and physically separate blocks of open space serve to undercut the continuation of these functions, values, and processes. Many species, including many indigenous to the Pine Barrens, cannot persist in fragmented landscapes. The reasons for this vary but include development-induced impacts such as roadkill for wide-ranging ground dependent species including small mammals and almost all reptiles and amphibians, to an inability to provide requisite minimum territories for size dependent species including many mammals and almost all terrestrial bird species found in the Long Island Pine Barrens.

Fragmented open space also makes it highly difficult, to impossible, for periodic wildfires to occur, a process that is both essential for the longterm maintenance of the Long Island Pine Barrens and which strongly influences the region's distinctive and unique ecological character.

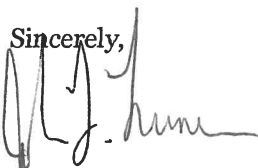
A related guideline to this concern contained in the CLUP is Guideline 5.3.3.9.2 relating to Clustered Development. The plan strongly recommends clustered development, recognizing that by so doing fragmentation of open space can be reduced, if not eliminated, and the long-term values and functions provided by large contiguous blocks of open space/wildlife habitat can continue unimpeded.

In our view neither the interconnected Unfragmented Open Space land use standard and Clustering land use guideline, respectively, are met with the current design and layout of the project. This is due to the fact the project contains numerous long and thin blocks of disconnected or thinly connected vegetation that have little to no ecological value as they simply do not provide sufficient habitat to ensure that affected wildlife species can meet their biological/life history requirements. Furthermore, it is clear from a review of the site plan that the developed portion of the site fails to maximize the Cluster concept as there are significant amounts of open space positioned between development components such as roads, fairways, residences and other structures. A true clustered development minimizes the amount of open space in these areas, shifting it to where it has the greatest ecological value, as part of larger more contiguous blocks of habitat and vegetation.

In conclusion, we believe that due to non-compliance with the aforementioned Standard relating to Unfragmented Open Space and the Guideline relating to Cluster Development, and the inability for the project to meet many other important Land Use Standards and Guidelines, as assessed and enumerated by other parties, the project does not comply with the CLUP and must be disapproved.

We appreciate the opportunity to provide Seatuck's perspective to you on the Lewis Road Planned Residential Development. We ask that this letter be entered into the hearing record for the application.

Sincerely,



John L. Turner
Conservation Policy Advocate.
Seatuck Environmental Association

cc: Steven Bellone, County Executive, Suffolk County
Edward P. Romaine, Supervisor, Town of Brookhaven
Yvette Aguiar, Supervisor, Town of Riverhead
Jay H. Schneiderman, Supervisor, Town of Southampton
John Pavacic, Executive Director, Pine Barrens Commission
Enrico Nardone,, Executive Director, Seatuck Environmental Association