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July 15, 2008

Ted Fink
Greenplan
302 Pells Rd.
Rhinebeck, NY 12572

RE: SEQRA
Review of PFEIS,
Silo Ridge Resort Community
Town of Amenia
Dutchess County, New York

Dear Mr. Fink:

We have received the Preliminary Final Environmental Impact Statement for Silo Ridge Resort Community dated May 30 2008, and have the following comments, focused on the Visual Resource Assessment (Appendix G) and related responses to comments.

Responses to comments:

Response 3.1-5-GP33: The second full paragraph on page 54 discussed the housing structure types that are designed for steep slopes, and uses the expression “upside-down house” to describe it. Example architectural elevations should be included to better describe this structure type.

Response 3.6.0-1-ESC: The second paragraph of this response does not relate to the comment.

Response 3.6.0.2-ESC2: In recent discussions the applicant has agreed to perform the analyses required by the NYSDEC Visual Policy Document. As a result, this response is no longer accurate.

Response 3.6.5-1-ESC7: The text descriptions found in Appendix G that describe the visual simulations are not responsive to this comment. First, these descriptions need to be written in the voice of the Planning Board. Loaded adjectives like “knitted” (as in, “structures are reduced in impact and knitted back into the landscape”), “tranquil” and “nicely” should be avoided as vague and imprecise descriptors. Second, the text needs to describe the action as it is seen in the photosimulations. From some viewpoints the action is transforming a rural landscape into urban densities with dozens of structures visible. While from other viewpoints the action is not, or is barely visible, yet every text for each viewpoint finishes with a materially similar version of: “The overall character of the view is largely unchanged from the existing character.” The applicant needs to produce text that accurately describes what is seen in the photosimulations.

The qualitative descriptions and the assessments of impacts on visual resources would be helped by focusing on more typical visual assessment criteria (e.g. form, line, color, texture, and scale/dominance). These are the components that compose a view and when each component is analyzed individually it helps to develop a fuller understanding of the visual impacts of an action.

Response 3.6.5.2-ESC8: This response directly conflicts with statements made by the applicant at meetings with the Planning Board, where it was acknowledged that grading was not used in the visual simulations found in Appendix G.

Response 3.6.5-5-ESC11: The applicant has recreated all the photosimulations so this comment and response does not apply to the visual analysis that is a part of the PFEIS. The response, nevertheless, is in error. The errors observed in images found in the on-line version can be found in any of version of the DEIS. The applicant should acknowledge that the original simulations found in the DEIS contained errors and that these errors created the need for the new visual simulations that were created for the FEIS.

Appendix G: The Visual Resource Assessment:

“Confidential” needs to be removed from the footer, as this a public document.

The vegetation used as a mitigation measure is, in many places, taller than what is typically planted. Assumptions that are a part of the visual simulations must be a part of the documentation of this Appendix. For example, if trees planted as a part of mitigation measures are simulated after 5 or 10 years of growth, the documentation must state the assumption.

Since SEQR requires that mitigation measures must be reasonable, and since the photosimulations only show neutral browns and tans as the colors of the proposed buildings, the applicant should reference the section of the EIS that refers to the deed restriction, restrictive covenant, or other mechanism that ensures that owners will not chose more visible colors for their homes (or subsequently paint their houses more visible colors).

Photosimulations for Viewpoints 5D, 7D, and 7B were redone to incorporate grading plans. This section should include these new photosimulations and a discussion of why these simulations include a grading plan while other simulations do not include a grading plan.

Summary

I only reviewed a relatively small section of the PFEIS and these comments only cover the section of the PFEIS I reviewed. Consequently, these comments should not be considered exhaustive.

Should you have questions or comments about this review please do not hesitate to contact me at 917-612-7478.

Sincerely,

A handwritten signature in black ink, appearing to read "G. M. Janes". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

George M. Janes, AICP
Principal