Advisory Comments by the Saugerties Conservation Advisory Commission on the Winston Farm DGEIS 7/27/25

Town of Saugerties CAC: Marcus Arthur, Chairperson, and Linda Armour, Carole Furman, Ken Goldberg, Mike Harkavy, Elizabeth Shafer, Stephen Shafer, Leslie Surprenant and Mary O'Donnell, Chairperson Emerita

DGEIS Section 1.0 Intro

Include in PDD Key Objectives "preserving forested areas" as part of natural features.

Add to the PDD Key Objectives that the benefits to public health and the environment shall take precedence over expected economic benefits.

Add to the PDD Goals and Objectives that the public health and environment are protected to the **maximum** extent possible from the GHG emissions resulting from the Winston Farm development.

DGEIS Section 2.0 Executive Summary

Climate Change

A PDD objective must include that all proposed development shall not be an impediment to achieving the climate goals of the NYS Climate Leadership and Community Protection Act or the goals of a Community Climate Action Plan.

The DGEIS fails to establish reliable thresholds for GHG emissions. The climate change analysis in the DGEIS examining "a reasonable range of alternative development scenarios to establish thresholds for environmental review" lacks reliable data and is inadequate to establish thresholds for GHG emissions. The DGEIS "qualitative assessments of potential impacts" are likewise inadequate. Scenarios serving as a "planning framework" fail to provide sufficient, reliable data to project GHG emissions from future development and to establish thresholds.

DGEIS Section 5.0 Evaluation of Potentially Significant Adverse Environmental Impacts

RE: 5.2.1.2 Wetlands

This section mentions NYS Department of Environmental Conservation-mapped wetlands; however, no mention is made of New York State's new wetland regulations.

The DGEIS should state that wetlands will be addressed in accordance with these new regulations adopted in 2025 to take effect January 1, 2028. Minimum regulated wetland size will be 7.4 acres or wetlands having one or more of eleven “unusual criteria.” Isolated vernal pools on the project site should be evaluated using NYS Department of Environmental Conservation’s amphibian reproduction assessments of egg mass counts for the Lower Hudson, NYC, Long Island and Adirondacks as follows:

Spotted Salamander - 10 or more egg masses

Wood Frog - 15 or more egg masses

Jefferson, Blue Spotted or hybrids - one or more egg masses or larvae

Eastern Tiger Salamander or Marbled Salamander - one or more egg masses or larvae

RE: 5.2.2 Potential Impacts

The document states that the water supply “may” or “might” be able to supply 370 gpm of water with an increased diameter well in some places in the DGEIS and states in other sections that the water supply “can” supply 370 gpm. The water supply testing did **not verify** that 370 gpm flow can be obtained and sustained with minimal impact to the aquifer.

5.7 Impacts on Open Space and Recreation

Establishing an Open Space Overlay Zone

Defining Open Space

The Town of Saugerties Open Space Plan (2010) presents a broad and holistic definition of open space. “Many people think of ‘open space” as the open fields that frame views of the mountains, rivers and other scenery. Certainly, these areas are part of Saugerties’ open space, but there are many other resources – from small wetlands to large forests and rock ledges – that are part of the town’s open space. While the aesthetics of open space is very important, open space also contributes to the environmental health of the community – not just for wildlife, but for people too.” The essential purpose of preserving open space within the boundaries of the Winston Farm lies within the aspirational vision found in the Open Space Plan generated by the people of Saugerties.

To define open space for purposes of delineation of areas on the Winston Farm it shall be considered areas of land or water that either remain in their existing natural state, or used in regenerative agriculture, free from development for residential, commercial, industrial or institutional use such as to remain available to continue to support the habitat of existing species. These portions of the property will be allowed to continue to offer the same ecological communities, vegetative cover and wildlife travel corridors as

currently exist, or will naturally evolve, on the site. Existing forested areas shall remain contiguous in perpetuity with the recommendation that they be put under Forest Reserve Land or conservation status with prohibited and permitted uses as outlined by same.

Open Space Threshold

Based on the 2024 DGEIS prepared by Saugerties Farms LLC, the Winston Farm consists of approximately 840 acres. Under the 2021 Saugerties Comprehensive Plan, at least 50% of the land, about 420 acres must be preserved as open space. However, the 50% figure is a minimum threshold and subject to review. The August 2024 DGEIS, now withdrawn from consideration, had the following paragraph contained in 6.3.3A (Potential Mitigation Measures) page 58:

"A significant portion of the property, approximately 70%, will remain open space and readily available to continue to support the habitat of existing species. This portion of the property will continue to offer the same ecological communities, vegetative cover types, and wildlife travel corridors as are currently present on the site".

In the 2009 Winston Farm Feasibility Study it was recommended that 73% of the property be dedicated to open space, which CAC strongly endorses.

In summary, the establishment of the open space threshold should be subject to more rigorous analysis by the Lead Agency and their consultants.

Exclusions from Open Space

Section 5.7.1D indicates that 30 acres of the property exists as structures, roads and other impervious surfaces. These 30 acres should not be included in the minimum of 420 acres dedicated as open space since they don't meet the definition of open space.

In addition, recreational areas such as, but not limited to, mini golf, driving ranges, golf courses, petting zoos, athletic fields, playgrounds, community pools, dog parks, campgrounds, campsites, tennis courts do not meet the definition of open space and should not be found within the designated open space acreage.

As of now, in the updated 2025 DGEIS, no specific open space area has been designated or mapped because development plans remain undefined. **This is a problem that must be remedied.**

Establishment of the Open Space Overlay Zone

Before any zoning changes or approvals for a Planned Development District (PDD) and Master Development Plan (MDP) are granted, the location of preserved open space must be clearly defined and mapped. This can be achieved through the creation of an **Open Space Overlay Zone, embedded directly into the PDD framework.**

Far from a radical idea, this would follow precedent, since the site already includes the Aquifer Protection, Sensitive Area, and Gateway Overlay Districts, along with DEC protected wetlands surrounded by buffer zones.

The Open Space Overlay Zone would drive the determination of future areas for development instead of the Master Development Plan's (MDP) doing so.

Benefits of this approach for the sponsors

- **Clarity upfront**: Developers will know from the beginning which areas are available for development and which are preserved, simplifying planning and marketing.
- **Streamlined MDP**: No need to negotiate open space designations while simultaneously designing the development plan.

Benefits of this approach for the public

- **Early engagement**: The open space map would be part of the DGEIS, a stage with significant opportunities for public input.
- **Transparency builds trust**: Defined protections increase confidence in the planning and reduce potential future conflicts.

Location of the Open Space Overlay Zone

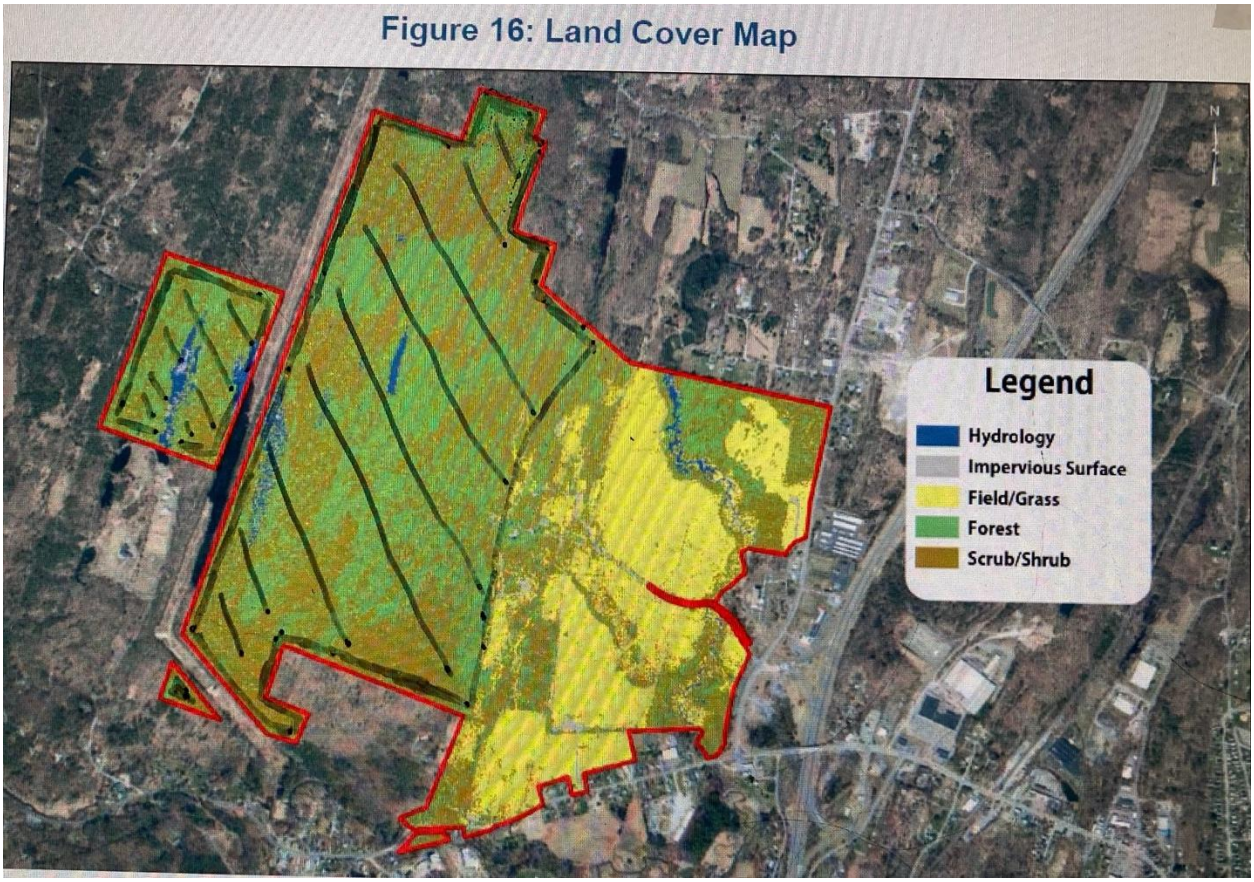
The CAC respectfully urges that 73% of the 840 acres (613) should be designated open space in its natural state. We recommend creation of an Open Space Overlay that captures most, but not all, of those 613. The difference between 613 acres and the number of acres in the Open Space Overlay (i.e. 613 - 550 = 63) would be made up by designating as open space, outside the overlay, that same number of acres in non-contiguous smaller parcels, taking in, for example, wetlands. Thirty acres of structures and impervious surfaces now in existence could not be counted as open space.

What might this look like? How many acres, and which ones, would be in the overlay would depend on how it is delineated. Below is a crude sketch of one possibility, using the map in the DGEIS p 29. The proposed overlay is inside the black lines. It includes the rectangle west of the Central Hudson ROW. A visual estimate of the area inside the black lines on the sketch below is 500 - 550 acres, pretty much all the acreage in the 840 that have tree cover. (Page xxiv of the DGEIS shows about 570 acres as forest. Most seem to be in the Open Space overlay that the CAC proposes here.)

An overlay along these lines would have an effect much like that envisioned in the Traditional Neighborhood Development alternative scenario (DGEIS p 185) in which "The western portion of the site is left largely undisturbed." Working with this scenario as a model, advantages include the following:

- Preserves the extensive forested areas in the Western portion of the property, with mandated 125’ buffers on the west and north edges of the property that lessens impact on bordering properties.
- Focuses development along Route 32, reducing neighborhood impacts and traffic intrusion.
- Provides the Town with the ability to achieve GHG emission reduction goals set forth in the New York State Climate Leadership and Community Protection Act.
- Allows for greater density through taller buildings, making the project more attractive and viable for development.

Summary: The establishment and mapping of an Open Space Overlay Zone, with a clearly defined boundaries, within the PDD, provides the necessary balance between environmental protection and economic development, one of the main goals of the SEQR process.



Sketch map of suggested Open Space Overlay (bounded by black lines inside red)

Forest Reserve Lands

Include in the open space overlay forest reserve land areas as defined in the current Zoning Law as, “A tract or tracts of trees or tree stands in which beneficial uses in their present condition are protected and intended to remain in a predominately natural or undeveloped state.”

It is recommended Forest Reserve Land for the approximately 546 acres of forests as identified in the DGEIS, are established and mapped out in the open space overlay to inform the MDP to ensure forested areas are protected to mitigate the adverse impacts of GHG emissions.

The DGEIS includes the following Ecological Community Types of Forested Acres:

Forested acres	Acres
Chestnut oak forest	115.02
Hemlock-northern hardwood forest	156.39
Successional northern hardwoods	150.37
Succession red cedar woodland	18.18
Appalachian oak-pine forest	105.85
TOTAL	545.81 = 65% of the total

Both the town’s Comprehensive Plan and its Open Space Plan include the importance of forests for the well-being of the public and the environment. Forests play a crucial role in carbon sequestration thereby reducing GHG emissions.

By reducing emissions, forest preservation helps achieve the NYS GHG goals for emissions reduction in compliance with the NYS Climate Leadership and Community Protection Act (NYSCLCPA). The NYSCLCPA scoping document states, “leaving mature forests intact will be most effective at increasing NYS’s carbon sequestration, storage and climate resilience.”

The beneficial uses of forests are numerous as stated in the Open Space Plan and the Comprehensive Plan. A Town of Saugerties Comprehensive Plan states “Preserve open space, forested lands and the view shed.” It also states, “Forests contain natural resources in addition to trees that are important not only for potential water quality protection, but also for their own intrinsic value.”

The town's Open Space Plan states, "the wetland, river, forest and soil systems in Saugerties must remain relatively intact in order to ensure that they continue to function properly to provide habitat for wildlife, and food and water for people." The plan also states, "The large, unbroken forests in the western part of Saugerties provide important connections to the Catskill Mountains for wide roaming mammals such as bobcats and black bear." Conserving forested land and providing public access where appropriate is also stated in the Open Space Plan.

Forests not only play a crucial role in carbon sequestration helping to mitigate climate change, they help to recharge ground water supplies by absorbing and retaining water.

Forests also help improve water quality by acting as natural filters reducing the amount of pollutants and sediment that reach water bodies. Tree roots help stabilize the soil preventing erosion and runoff. Forests provide essential habitats for wildlife.

5.9.2 Potential Impacts

5.9.2.1 Water and Wastewater

Though it is generally accepted today that effluent from a properly-operated tertiary sewage treatment plant can legally be discharged into class C surface waters like the Beaver Kill, the DGEIS fails completely to reckon with the impact of the conceptualized waste water treatment system on water quality in the Beaver Kill."

Three starting points of discussion, two of which are taken directly from the DGEIS:

- All future development on the 840 acres is constrained by the availability of water from wells on or near the property now thought capable of delivering 270 to 370 gallons per minute. For this analysis, assume 370 gpm (= 532,800 gpd).
- "The wastewater treatment system (WWTS) will be designed to handle the strengths of the sewage generated by future uses. The final plans for a WWTS will be completed later at the development-specific level. *The WWTS is subject to a State Pollutant Discharge Elimination System (SPDES) permit for the treatment of the wastewater and discharge to the Beaver Kill*." (emphasis added) DGEIS p 106
- "This system will be sized to handle peak flows (four times the average daily flow)." DGEIS p 106

How much wastewater would go into the Sewage Treatment Plant conceptualized in the DGEIS? Usage of water projected in the Sponsor's Preferred Plan is shown below (app. K)

For design purposes, the anticipated maximum daily demand was calculated using a peak factor of 2.0. Conservatively, the peak day demand was calculated using a factor of 4.0.

Table 6: Projected Sponsor's Preferred Plan - Scenario Based Water Flow

Scenario	Demand (GPD | gpm)
Total Average Daily Flow	395,500 GPD (275.0 gpm)
Maximum Daily Flow (Factor of 2)	791,000 GPD (549.0 gpm)
Peak Flow (Factor of 4)	1,582,000 GPD (1,099 gpm)

The sewage treatment process given as a concept would have three membrane bioreactor treatment trains, each able to treat 122,000 gpd. Three should handle 366,000 gpd. App. K 8.2

8.2 Treatment

The on-site wastewater treatment plant will be modular, allowing for expansion and adaptation as the project develops, which also provides the opportunity to expand if and as additional users are contracted. The system will be sized to handle peak flows (four times the average daily flow).

For the average and peak flows, it is estimated that three proprietary membrane bioreactor (MBR) treatment trains will be used. The on-site treatment plant is composed of a headworks building, individual MBR treatment trains capable of treating 122,000 gpd each, sludge dewatering-storage system and a laboratory building. The headworks consists of flow equalization, primary treatment and then fine screening of the influent followed by activated sludge aeration. The sludge that is fine screened is then dewatered and stored and can optionally be treated onsite. The MBR treatment train contains filtration and treatment followed by an ultraviolet (UV) disinfection process.

K 8.2 The passage above says "The system will be sized to handle peak flows (four times the average daily flow)." Two values are offered for peak, one projected and one probable.

The DGEIS does not tell readers what proportion of daily water consumption in the PDD ends up in the sewage treatment plant (STP). An EPA document cites 85% as the proportion of pipe-delivered water that becomes wastewater https://www3.epa.gov/npdes/pubs/mstr-ch3.pdf. (This factor will vary by region, being lower where lawn and garden irrigation is common.) 85% of the peak 1,582,999 gpd (=1099 gpm) is 1,345,000 gpd (= 934 gpm), much more than three MBRs could process. 85% of the daily average of 395,500 gpd (SP scenario) is 336,000 gpd, less than 366,000. The system conceptualized with three MBRs could not handle maximum daily load (double the average). Still less could it deal with peak one-day load, whether peak is probable or projected.

Appendix K 8.1.1 shows that an 8-inch diameter main could accommodate 790 gpm (= 1, 137,600 gpd). This is more than the probable peak in the SP scenario (750 gpm = 1,080,000 gpd), but less than the peak projected. A ten-inch main could handle peak projected.

How much treated wastewater would be released from the conceptualized STP? The EPA document above says that the volume of treated wastewater effluent from a STP is about equal to the volume of raw wastewater that came into it.

The DGEIS gives no estimate of how much water flows through the Beaver Kill on an average day, a drought day or a superstorm day, annualized averages don't tell the whole story. It is thus impossible to gauge the impact on water quality in the Beaver Kill of adding 336,000 gpd of treated wastewater on a given day. What would be the dilution factor on a summer day when the stream was moving low volumes?

Appendix K 8.3 gives discharge effluent objectives. Without knowing discharge rates in the receiving stream, however, it is not possible to say whether such effluent will be properly diluted on a given day.

8.3 Discharge Effluent Objectives

The package wastewater treatment plant will be designed to treat the wastewater to the following effluent concentrations prior to discharge.

Table 19: Effluent Discharge Objectives

Parameter	Objective	Units
Biochemical Oxygen Demand- 5 day (BOD_5)	<5	mg/L
Total Suspended Solids (TSS)	<5	mg/L
Total Phosphorus	<0.1	mg/L
Ammonia (NH_3)	<1	mg/L

Once a SPDES permit is issued, the processes will be adjusted as necessary to meet the issued effluent limits.

The conceptual plan assumes that a SPDES permit will be obtained. Given that dry-season flow in the Beaver Kill may be found inadequate to properly dilute the daily volume of treated effluent, an unconditional permit should not be taken for granted. The preliminary plan must conceive of an alternative to direct discharge to the Beaver Kill.

By making plans for sewage treatment purely conceptual, the DGEIS also puts off addressing the consequences of a failure in a properly-sized STP. It avoids discussion of who would pay for building the extra-municipal system and who would regulate its operation.

Conclusions:

1) The conceptual wastewater treatment plan (3 MBR treatment trains) seems of adequate size for the average daily volume of wastewater intake likely under the hypothetical sponsors' preferred scenario. Yet the system is supposed to be sized to "peak flows." It is not.

2) Effects on the water quality of the Beaver Kill of adding to it the predicted daily volume of properly-treated water cannot be reckoned, since the DGEIS gives no estimate of flow rates in the Beaver Kill.
3) The conceptual plan for wastewater treatment has little or no reserve for failures in operation of the sewage treatment plan.
4) The conceptual plan takes an SPDES permit for granted. The GEIS must have an alternative to what is in the DGEIS.
5) Finally, the DGEIS does not say what agency or agencies would finance construction of the wastewater treatment system or how it would be monitored once in operation.

To get approval from the Lead Agency the GEIS must correct these deficiencies.

5.9.2.2 Gas Electric

Table 22 contains figures for projected natural gas use. The NYS All-Electric Buildings Act prohibits use of fossil fuels in new residential and commercial buildings under 7 stories after December 31, 2025 except in very limited and specialized cases and as of December 31, 2028, this will apply to all new construction with limited exceptions. Based on the above legislation, the CAC recommends the most stringent codes governing the use of fossil fuels be adopted, which includes prohibition of fossil fuel use.

Section 5.10.2 Potential Impacts

CAC acknowledges that there is understanding by both the Town of Saugerties and the Sponsors of the Winston Development that the purpose of implementing a zoning change at the site is to improve the conditions of possible development there. The CAC supports that goal so has reviewed the DGEIS/PDD with an eye to environmental issues. What follows is observation on GHG thresholds:

Table 23 summarizes yearly Greenhouse Gas Emissions (GHG) in terms of total Metric Tons of CO2 produced per year for the three build-out scenarios considered in the DGEIS: As Of Right (AOR), representing the present zoning, which is projected to be 3,444, MTCO2/yr; Sponsor's Preferred (SP) 6,526/yr; RWCS (Reasonable Worst Case Scenario) 8,032/yr.

Section 5.10.3 A Potential Mitigation Measures

This section states that the figure for the RWCS (projected to be 8,032/yr) is the figure that future development will be required to remain below to avoid further scrutiny. This is echoed in section 6.2.6.

This is antithetical to the stated goal of creating a more *desirable* outcome in future development by enabling the zoning change. It allows nearly 2-1/2 times the amount of GHG to be produced as in the existing zoning, not a positive change by any rational standards.

The Town as Lead Agency shall set the threshold of GHG allowed in the PDD to that *less than* that allowed by the current zoning. This will permit meeting the stated goals to *improve* conditions resulting from a zoning change and development

12.3 Alternative 3 Traditional Neighborhood Development Scenario

The Traditional Neighborhood Development (TND) scenario envisions a walkable, mixed-use community where residential neighborhoods are clustered around a central village core. Tech and commercial uses are limited to access from Route 32, reducing traffic impacts on residential areas, while the western portion of the site is preserved as natural open space. Industrial uses are reserved for the interior of the eastern half of the site as far away from the adjacent properties as possible. Buildings in this alternative are taller to allow for increased residential density on the eastern side while having no residential use on the western side. This seems the environmentally superior alternative.

The DGEIS does not do as full an analysis of the TND scenario as it does the AOS, SP or RWCS: ex. Table 23 in section 5.10.2 does not contain GHG emissions figures for TND. This scenario should be afforded the same analysis as the others, as that is what is called for in the DGEIS for establishing thresholds.

DGEIS Appendix J Climate Change Analysis Report

The Appendix J statement that “a 3% increase in annual GHG emissions in the Town of Saugerties upon full build-out” is based on assumption and requires additional evidence to substantiate the statement.

To ensure the environment and public health are protected to the greatest extent possible, the following word changes are needed:

- Appendix J states, “There is ±591 acres of forested land on the site (69%),” and “Over 400 acres of the property will be zoned open space to conserve the site’s carbon sequestration.” Change “will” to “**shall”.**

- Change the wording - “The goal is to carefully manage this transformation by minimizing or mitigating the anticipated adverse impacts to the extent practicable” - to “by minimizing or mitigating the ~~anticipated~~ adverse impacts to the **maximum** extent.
- Key Objective - “To promote context-sensitive development that embraces the site’s natural beauty and panoramic views of the nearby mountains” - change the word “promote” to “**ensure.**”

Appendix J Climate Change Analysis Report

6.0 Emission Reducing and Mitigation Strategies

Strategies are vague and need to be required, not merely recommended.

Justify the statement, “Since the current action being proposed is a zoning change, which is administrative in nature, and all three development scenarios being conceptual, there will be no impacts to GHG emissions based on the zoning change alone.”

While the scenarios for possible buildout put forth in the DGEIS are conceptual, the many *uses* listed in the PDD section D (1-8) are actual and specific each with real world consequences (increased GHG production) that need to be considered before they are codified and sanctioned for use in any future buildout.

The proposal for actual development is no longer in the DGEIS and any alternatives, scenarios or development densities, development scenarios in the DGEIS are hypothetical and do not represent actual development proposals. Therefore, the climate change analysis in the DGEIS predicting GHG emissions upon full build-out, *quoted below*, is unreliable. *“Based on the climate change analysis, the predicted maximum GHG emissions at the Winston Farm site upon full build-out are 8,032 metric tons of carbon dioxide equivalent (MTCO2e)”*

DGEIS Appendix P PDD Regulations

Planned Development District (PDD)
The PDD establishes goals and objectives for future development. To support and strengthen the PDD intent and objectives, include the goals for Winston Farm as stated in the Comprehensive Plan: be environmentally sound with a focus on energy self-sufficiency, protect the aquifer, preserve open space, forested lands and the view shed.

Include in Key Objectives “preserving forested areas” as part of natural features.

Section C (1)

Change Appendix P C 1 to include only those parcels considered for development purposes. Eliminate from Appendix P C 1 those parcels that shall remain undeveloped in the Open Space Overlay.

Permitted Uses

Section D (1)

Because of pesticide use, massive water use, other negative environmental factors, and the existence of at least 4 similar area facilities, golf courses should not be allowed.

D (2)

Entertainment and recreational uses include seasonal and year-round indoor or outdoor, cultural, sporting, recreation and exhibition-related activities, such as performing arts and amphitheaters. The 2025 DGEIS modified the previous year’s outdoor plan to state an amphitheater would be fully enclosed, rather than open-air, but retained language allowing a seating capacity of 5000.

An amphitheater, or arena also mentioned, of this size would greatly increase traffic not only from the Thruway, but from all local roads leading into Winston Farm. The increase in GHG from the additional traffic would unacceptably negatively affect the quality of life of the Saugerties community. To mitigate the traffic and GHG effects we recommend that amphitheaters or arenas should be limited to a capacity of 1500.

Section D (4)

Warehouses, storage, and distribution facilities mentioned in this section should be limited to use solely by onsite operations.

Section E (3)

Appendix P, states, ‘Until such time as the Master Development Plan is approved, development shall be subject to the current zoning classifications of General Business (GB), Moderate Density Residential (MDR), and Hamlet Residential (HR).” Justify the

development should be subject to current zoning when the property is subject to the adopted PDD which means the current zoning would no longer apply.
Reword – After the PDD is adopted, no development shall be permitted until such time as the Master Development Plan is approved.

Section G.(3).

Site Development Plan Approval and Subdivision Approval Procedures.

This paragraph reads

"Development in the PDD is further subject to § 245-24 Sensitive Area Overlay District, § 245-25 Aquifer Protection Overlay District, and § 245 27 Gateway Overlay District. Where a conflict may arise between the regulations of the PDD and the overlay districts, the PDD regulations shall prevail."

This statement is in direct contradiction with statements that appear throughout the main body of the DGEIS, that all development on the Winston Farm (WF) property will comply with the three overlay districts (*Sensitive Area Overlay District*, *Aquifer Protection Overlay District*, and *Gateway Overlay District*) whenever and wherever these three overlay districts apply (see DGEIS pgs.14,17,46,51,158,159,169 and19)

The CAC strongly recommends that the statement from Appendix P, Section G.(3) provided at the beginning of this comment either be deleted entirely; or be changed as follows:

"Development in the PDD is further subject to § 245-24 Sensitive Area Overlay District, § 245-25 Aquifer Protection Overlay District, and § 245 27 Gateway Overlay District. Where a conflict may arise between the regulations of the PDD and the overlay districts, the Overlay District regulations shall prevail."

Section H (7)

This section of the PDD sets forth Building Design Standards and Guidelines. The vast majority of what is described there is aesthetic in nature, and while that is important, there is no mention made of energy efficiency or other environmental parameters that would lead to mitigation of the effects of such a massive development build-out and to a better ecological environment than would be realized from the current zoning.

There are vague refences in the DGEIS to awareness of the environment in development and mention of adherence to the "NYS Uniform Fire Prevention and Building Code" which they said contains the "Energy Conservation Construction Code."

That is already mandatory, the status quo, not an improvement over current zoning which is the stated goal.

Considering the massive nature of this endeavor, high and enforceable environmental standards need to be in place. Committing to such standards as put forth in the LEED model with its many faceted approach to environmentally conscious development, adopting the NYS Stretch code, and using guidelines of the Green Building Council should be employed to ensure the goal of a creating a better environmental outcome for the Winston Farm and our community, and surpassing what is inherent in the current zoning,which is the stated goal.

We should seize the opportunity to enable development that utilizes all renewables, and is net zero in its carbon footprint to avoid turning Winston Farm from its present status as a mitigator of GHG production to one that will inevitably worsen our current environmental crisis.

Section H (7) C

Landscaping standards should be established that mandate only native plant species be used in all landscape plantings, including all trees and ornamental plantings.

Additional Comments

Climate Change
Fiscal Impact of Climate Change

The DGEIS fails to account for the impact on town budgets resulting from climate-related disastrous events requiring costly preventive and remedial financial resources.

According to the U.S. Global Change Research Program, “The adverse economic consequences resulting from climate change are as severe as the physical damage these events cause.”

According to NYS Comptroller Thomas DiNapoli, “Local governments are shouldering much of the financial burden of climate change as they maintain important infrastructure such as roadways, drinking water systems and sewers.” In 2023, New York State experienced $50 billion in climate-related costs.