

**Letter to the Editor****Shawangunk Journal****By Andrew Willingham, David Clouser & Associates****Date: February 11, 2013**

Our firm, David Clouser & Associates, has provided engineering consultation and representation for the Basha Kill Area Association (BKAA) regarding several projects in the Town of Mamakating, including Seven Peaks, located on the Shawangunk Ridge, and Commerce Park, located at Wurtsboro Airport. We have provided engineering comments on behalf of the BKAA with regard to both of these projects as part of the Town's environmental review process. We have since reviewed the Journal's January 2013 articles that included an interview with the Developer of the two projects, Shalom Lamm, and other updates regarding the status of each project. On behalf of the BKAA, in response to the above articles, we offer the following.

With regard to Seven Peaks, we have received and reviewed the proposed changes to the project's design. In the 1/24/13 article, it states that Mr. Lamm claimed "he had dramatically shrunk the size of his Seven Peaks development...". Per our review of the revised plan, we respectfully disagree. Although the hotel portion of the project has been removed, the impacts associated with the hotel were not assessed in the Draft Environmental Impact Statement (DEIS), claiming that review would occur at a later date. In our opinion, the hotel proposed in that location was not feasible even prior to its removal from the plan, due to the sewer, water, emergency services and traffic demand as well as other potential impacts associated with that use. The other notable changes to the plan were a minor rearrangement of single family residential lots (however, still proposing 49 lots) and a realignment of the access drive.

Nearly all of the substantial issues raised in our correspondence to the Planning Board during the DEIS review remain outstanding and unaffected by the proposed changes to the plan. The earthwork and land disturbance associated with the proposed road network on the property's steep terrain is substantial, permanently altering the site and increasing the likelihood of impacts to downstream wetlands and watercourses due to site erosion. In fact, the revised entrance road traverses a much steeper area than previously proposed, likely intensifying those impacts. The tree clearing required to provide the views from each home (which is an admitted key design element/amenity of the project) has been substantially underestimated with regard to visual and other land impacts. The soil testing provided for septic system siting was sparse (or nonexistent in the case of percolation tests) providing no proof whatsoever that the inground septic systems proposed are viable or approvable. With regard to stormwater, the analysis provided in the DEIS utilized inappropriate methodology, incorrect parameters and contained substantial errors, preventing any meaningful assessment of stormwater impacts.

Although the Commerce Park project remains in the early stages of the environmental review, it is clear that the proposed creation of 72 +/- acres of impervious buildings and parking directly adjacent to the Gumaer Brook/Basher Kill and the Delaware & Hudson Canal has substantial potential impacts associated with stormwater runoff, wetlands, floodplains, sanitary sewer, and other potential impacts. Should Commerce Park proceed with the preparation of a DEIS, the assessment and mitigation of these impacts will be a difficult task, given the massive scale and location of the development.

Seven Peaks and Commerce Park remain projects with a high potential for adverse impacts, despite the recent declarations made by the Developer. We look forward to our continued review of these important projects on behalf of the BKAA.