



October 19, 2015

Supervisor Barbara Welch  
Town of South Bristol  
6500 Gannett Hill Road West  
Naples, NY 14512

Re: Canandaigua Lake Watershed Association Review of the Everwilde D.E.I.S.

Dear Supervisor Welch and South Bristol Town Board Members,

The Canandaigua Lake Watershed Association is a thousand member non-profit organization dedicated to preserving, protecting and promoting Canandaigua Lake and its watershed for future generations by supporting scientific research, sound public policy, and community education.

CLWA went on record with our initial concerns for the 45.7 acre Everwilde Inn and Spa project on September 17, 2015 in a letter to the South Bristol Town Board regarding the rezoning application. A project of this magnitude in the Canandaigua Lake watershed is concerning for many reasons; of foremost concern is the development of steep slopes leading to the shoreline, which is likely to increase runoff to a lake that is already experiencing compromised water quality. Additional concerns lie with the inadequate sewer and water infrastructure, the disruption of viewsheds, and the need for dramatic change in the current rural zoning of this area.

As a non-profit organization promoting "*Healthy Land to insure Clean Water*", we appreciate the opportunity to review the design for the Everwilde Inn and Spa project from a water quality perspective. Upon review of the Draft Environmental Impact Statement, we submit our concerns for your review.

**OUR CONCERNS:**

1. The DEIS indicates that the entire development will be built out at once. A project of this size and complexity on steep slopes should be phased to reduce the environmental impact. Aligning the primary buildings perpendicular to the slope results in the need for maximum excavation and site disturbance. The two major principles to be followed in

controlling erosion on construction sites are: minimize disturbance and phase the necessary disturbances to allow quick remediation.

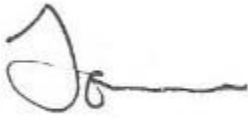
2. Is the single detention basin's volume sufficient to adequately, both quantitatively and qualitatively, treat the volume of storm water from the developing site? With no sediment forebay(s) or back up redundancy, failure is a concern. Additionally, the proximity of the southernmost dosing field (40 feet in elevation above the detention pond) is a concern because pollutants from this field could leach (due to types of soils and underlying shale) or run overland into the detention pond. As the current design illustrates, this would allow leachate from the field to run through the 18 in pipe directly to the lake.
3. The construction and maintenance of the road/cart path providing access to the lake and bluff side entertainment facility is of great concern. The steepness of the slopes, types of soil, shale cliffs and high intensity rainfalls that often occur in this area make road construction and runoff control very difficult. Chances of polluting the lake with sediments from this phase of the project are extremely high. We are very concerned with the placement of a road/cartpath down to the bluff. In view of the environmental sensitivity, consideration should be given to abandoning this portion of the design.
4. With the sanitary facility at the bluff, the sewage will need to be pumped up steep slopes for treatment and there are many chances for failures. What long term safeguards will be in place to prevent a failure?
5. The current plans and DEIS do not show how run off from the right-of-way for the access road/cart path to the lake (about 1 acre) will be handled and treated.
6. Can extensive "green infrastructure" be deployed and work to reduce stormwater flows to the extent being claimed? Concerns also lie with proper and constant maintenance over time, which is critical to its long term effectiveness.
7. What protection for the lake will be installed at the storm sewer outfall? The pipe runs approximately 1800 feet and drops in elevation in excess of 400 feet to the outfall, creating tremendous head pressure and potential turbulence at the water's edge. During high intensity rainfalls, the proposed energy dissipater may cease to work effectively to protect the lake's shoreline or plug and lead to failure of the sediment basin above.
8. Based on the plans, the storm sewer outfall and the drinking water intake appear to be in close proximity. Doesn't this pose an unacceptable risk to drinking water?

9. The Spa, Restaurant and Hotel will use chemicals for cleaning and other sanitation related activities. The DEIS does not address what they are or how these chemicals will be treated and/or disposed of.
10. Applicant claims no need to get a stormwater discharge permit because 0.91 acres is being drained (due to green infrastructural improvements), not the threshold 1 acre. Does this calculation take into consideration the drainage and storm water management required for the bluff's entertainment structure which entails 5,000 plus square feet of impervious surfaces? Reducing the effective drainage area of this extensively developed 45.7 acre site down to just 0.91 acres does not appear to be realistic: too much credit seems to be given to green infrastructural improvements that are being proposed and all developed areas are not being factored in. A stormwater discharge permit should be required.
11. The recently added tram was not addressed in the DEIS. More information is needed with respect to size, design, and potential cliff damage. The execution and performance of the engineered design and its operation and maintenance over time should be addressed.
12. In the event of a stormwater basin failure, the materials and overflow will run over the adjacent properties to the southeast and directly to the lake.
13. There is no mention in the design of an in-house laundry facility to service rooms, food and beverage, catering and the spa. Please clarify the plan for handling laundry at this facility. Is there a plan for handling the residual pollutants and is the proposed treatment system sufficiently designed to handle these waste products?
14. The design is shown with a waterside boardwalk which is inconsistent with the square footage allowed under the Uniform Docks and Mooring Regulation.
15. Alternate sites were not considered as required of the DEIS. This should be revisited.
16. The DEIS does not address any viewshed impacts, in particular, the permanent alteration of the scenic views from the Bare Hill NYS Unique Area, and the Finger Lakes Land Trust Reed Tract land, which includes 65 acres and a 390 foot cove beach at the base of Bare Hill.

The lack of municipal services such as water and sewer and the property's steep slopes create special problems for any developer. The Canandaigua Lake Watershed Association continues to oppose the rezoning of this unusually difficult property.

Thank you for the opportunity to comment on the DEIS prepared for this project, and we appreciate South Bristol's concern for our valuable resource, Canandaigua Lake.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Zimmerman', with a long horizontal flourish extending to the right.

Thomas A. Zimmerman  
President  
Canandaigua Lake Watershed Association  
PO Box 323  
Canandaigua, NY 14424