



January 24, 2017

Town Board of South Bristol  
Dan Marshall, Supervisor  
6500 Gannett Hill Road  
Naples, NY 14512

Dear Supervisor Marshall and Town Board Members,

The Canandaigua Lake Watershed Association has followed and previously provided comments both written and in person to the Town of South Bristol regarding the proposed Everwilde Inn and Spa development. This letter is in response to the SEIS dated December 12, 2016.

In the SEIS and analysis, the developer addresses the capacity of the current sewage treatment facility, fresh water supply capability and consideration of the current Bristol Harbour Resort property, which it previously acquired, as a potential alternate site for the proposed Everwilde resort.

The Canandaigua Lake Watershed Association on behalf of its membership strongly urges the South Bristol Town Board to reject the Everwilde Development Team response to the SEIS and refer it back for a more serious and realistic review for the following reasons.

1} There has not been a thorough analysis conducted of the Bristol Harbour sewage treatment facility with respect to its capability to process and handle the complex chemical compounds and waste generated by a spa facility of the size proposed by the Everwilde developer.

2} The potential inclusion of an onsite laundry as part of the Everwilde build out and the enhanced sewage treatment requirements associated with a hotel laundry are not identifiable in the plans or specifications that have been made public to date.

3} An adequate analysis and feasibility of potential alternate sites, within control of the Everwilde team, have not been given appropriate consideration when viewed through the lens of the existing zoning regulations and balanced with the town's responsibility to its citizens and the potential degradation to the water quality of Canandaigua Lake.

The following review of the SEIS lays out some of the science and environmental rationale for returning this project to the developer for a more in-depth vetting regarding the issues raised by the Town of South Bristol and its concerned residents.

## **SANITARY SEWER AND WATER SUPPLY**

The capacity and consumption projection calculations are not in question. In reviewing the plans and the information outlined in the SEIS, it isn't clear if the developer intends to construct an onsite laundry facility to handle the hotel, banquet and spa linens. This is important to clarify as part of the Town Board's due diligence. The proposed 95,000 SF build out differs significantly from a normal 50 room resort project.

In total, they are proposing 400 seats of food and beverage capacity and an 18-room spa facility. The proposed ancillary facilities represent a significant laundry load for a 50-room hotel. With the inordinate incremental laundry load being derived from spa and food and beverage linens, it greatly increases the chemicals required to process this type of linen vs guestroom linens. This is due to the chemical compounds and complex products used in high-end spa treatments as well as those used to properly clean and sanitize a spa facility. Additionally, there is heavy soil in food and beverage linens which require higher detergent mixes and solvent additives to clean, bleach, process and finish the linens for use in a high-end resort facility. These factors all have an immediate and long-term impact on the type of effluent load that must be processed and treated.

Does the capability to process this type of increased sewage load conveying the chemical waste exist in the current treatment facility? It is crucial to consider this design feature in evaluating not only capacity but capability of the current treatment facility to meet the future treatment and processing loads required. This is even more important since the effluent discharge is directly into Seneca Point Gully draining into the drinking water source for 65,000 people, Canandaigua Lake. This analysis doesn't look at the effect of what the DEC refers to as a system burp where less than fully treated sewage effluent is inadvertently or accidentally released. These releases can and do occur during maintenance incidents, or the system capacity being temporarily over run by an intense storm event. In real terms, this results in a spill or temporary release of untreated or partially treated sewage into a location that isn't acceptable. The Town Board as lead agency in conjunction with the developer's design team needs to ensure the necessary system capability and adequate redundancy are part of the approved design, regardless of the proposed resort's location.

## **ANALYSIS OF POTENTIAL ALTERNATIVE SITES**

In reviewing the alternate site analysis done by the Everwilde Development Team, it appears they have overlooked and not considered some viable alternatives. They have ruled out for good reason several locations that do not make sense from a build out and environmental standpoint.

For some reason the Monks Road site, which the developer owns as part of the Bristol Harbour Resort parcel isn't shown on the site maps submitted or given consideration as an alternative. This site would require the same type of zoning change they are seeking for the Seneca Point Road site but doesn't involve property that is as environmentally sensitive. Why not consider this site as a viable alternative?

The developer has chosen not to consider the most prime site alternative of all, the current Bristol Harbour Resort site. This site meets all the developer's qualification criteria. It is sited with the best panoramic view of all the sites. It is a private location with a private access drive, sight proximity from Seneca Point Road, water front access already in place with minimal approvals required due to its preexisting Planned Development status and approved docking and slip system. This location would fit within the existing zoning code and the Uniform Dock and Mooring Regulations without requiring the need for variances or rezoning.

The current Bristol Harbour Resort site would result in less overall disturbance, environmental impact and would better meet the balanced needs of the developer and the surrounding community. Siting the development on this location would eliminate the unprecedented step in the watershed, of rezoning a residentially zoned piece of waterfront property, in a residential setting, for commercial use in a community that prides itself in preserving its rural atmosphere and natural capital. The reconsideration and selection of this very viable site which the developer controls looks like a win for all stakeholders.

Selection of this site would eliminate the need for any rezoning, eliminate the tram requirement and the need for a high-pressure sewer line running over 1000 feet uphill from the bluff side special entertainment unit to the resort. The use of the Bristol Harbour Resort footprint would greatly reduce the project's environmental impact, and the risk of a sewer main or utility malfunction jeopardizing the lake and water quality.

The Canandaigua Lake Watershed Association urges the South Bristol Town Board to refer this project back to the developer for reconsideration of these viable alternative sites and to conduct a review of the capability of the existing sewage treatment plant.

Respectfully,

A handwritten signature in black ink that reads "E. H. Carman IV". The signature is written in a cursive style with a long horizontal line extending from the end.

Edward H. Carman IV

The Canandaigua Lake Watershed Association

The Canandaigua Lake Watershed Association is a thousand member, non-profit organization whose purpose is to protect the water quality and overall environment of the Canandaigua Lake watershed for future generations by applying scientific research, advocating sound public policy, and offering educational programs to the community.

Canandaigua Lake Watershed Association  
P.O. Box 323 Canandaigua, New York 14424  
(585) 394-5030  
www.canandaigualakeassoc.org  
Email us at: [info@canandaigualakeassoc.org](mailto:info@canandaigualakeassoc.org)