

October 20, 2022

Supervisor Yvette Aguiar &
Members of the Riverhead Town Board
Riverhead Town Hall
200 Howell Avenue
Riverhead, NY 11901

Memorandum In Support
Moratorium & Generic Environmental Impact Statement
on Proposed Industrial Warehouse Uses within Calverton

Dear Supervisor Aguiar and Members of the Town Board,

We the undersigned, write on behalf of EPCAL Watch, Greater Calverton Civic Association, Group for the East End, North Fork Environmental Council, Riverhead Neighborhood Preservation Coalition, and the Wading River Civic Association, concerning the overwhelming and community-altering commercial industrial warehouse uses all proposed within the single hamlet of Calverton. If collectively approved, they have the potential to forever, negatively impact the overall environment, community character, infrastructure and wellbeing of not only Calverton, but town-wide residents.

Summary Statement:

Given the historical and sheer amount of development proposed within a single hamlet amidst the Town's undertaking of a Comprehensive Plan, we believe it is necessary to adopt a land use moratorium on the approval of commercial industrial warehouse uses throughout Calverton. The moratorium will provide the Town the necessary time needed to complete its Comprehensive Plan and to initiate a Generic Environmental Impact Statement (GEIS) to examine the cumulative impacts of the proposed developments in order to achieve alternatives and mitigation strategies that will ultimately be in Calverton's best planning interests.

At this writing, the six projects listed below amount to over 1,575,000+ sq. ft. not including the 1,000,000 sq.ft. *minimum* proposed at EPCAL.

- HK Ventures - (4285 Middle Country Road, Calverton) - 423,000+ sq. ft.
- Calverton Industrial Subdivision - (3511 Middle Country Road, Calverton) - 410,000+ s. ft.
- POD Storage - (3651 Middle Country Road, Calverton) - 45,000+ sq. ft.
- Riverhead Logistics Center (1743 Middle Road, Calverton) - 641,000+ sq. ft.
- RGR Ventures - (East side of Manor Road, Calverton) - 28,000+ sq. ft.
- EP Equity Holdings Four LLC - (582 Edwards Avenue, Calverton) - 28,000+ sq.ft.
- EPCAL - (Calverton) - 1,000,000+ sq. ft. (Phase 1) + 9,000,000+ sq. ft. (Future Phases)

Total - 2,575,000+ sq. ft.

Total With Future EPCAL Potential - 11,575,000 +Sq. Ft.

Moratorium:

The adoption of a land use moratorium, in this case, is justified by a valid public purpose and made legal pursuant to Municipal Home Rule Law. The purpose is to complete the Town's

Comprehensive Plan, which will likely lead to zoning amendments that may potentially alter the zoning code in such a way as to materially amend what is permissible in the Town's commercial industrial code.

Similarly, the Town of Riverhead adopted a moratorium on October 20, 2021 on the development of "commercial solar energy production systems" and concluded that, "In short, sound planning will lead to a higher quality of life for all of Riverhead's citizens" (302-1 Legislative Intent. M).

Generic Environmental Impact Statement (GEIS):

According to Section 617.10 (a) of the New York State Environmental Quality Review Act, a Generic Environmental Impact Statement may be used to assess the environmental impacts of:

- 1) *A number of separate actions in a given geographic area which, if considered singly, may have minor impacts, but if considered together may have significant impacts; or*
- 2) *A sequence of actions, contemplated by a single agency or individual;*
- 3) *Separate actions having generic or common impacts;*
- 4) *An entire program or plan having wide application or restricting the range of future alternative policies or projects, including new or significant changes to existing land use plans, development plans, zoning regulations or agency comprehensive resource management plans.*

The proposed developments represent "separate actions in a given geographic area" and therefore, clearly fit the first enumerated description illustrating the use and need for a GEIS in this circumstance. A GEIS has the ability to evaluate the larger context of the development proposals in terms of **cumulative impacts** and stresses the importance of mitigation in terms of size and scale. Reviewing each individual project on a first come, first serve basis, as the Town's Planning Board is currently doing, cannot achieve a sufficient level of comprehensive analysis that will provide an appropriate "hard look" at the magnitude of the environmental impacts that these projects will impart on Calverton as well as town-wide.

Further, a GEIS provides the opportunity to discuss the "logic" and "rationale" for project basis and also provides for an analysis of specific potential environmental impacts. Traffic, assessment of need, impacts on and in relation to an environmental justice area, infrastructure impacts, air quality, community character, conformance to adopted planing and zoning regulations and many others would be addressed.

Of critical importance is the public's ability to understand the comprehensive and collective impacts of these projects analyzed with uniform standards so that there is constructive public participation within the review process and alternatives and mitigation measures are developed.

Conclusion:

In our view, the undeniable number, significance, magnitude, and similar impacts associated with the multiple proposed warehouse applications now before the Town, call out for a comprehensive and integrated analysis. Absent a fully integrated review that can readily be provided for through a GEIS, we cannot see how the Town Board could make a rational and informed decision about all of these proposals in the same geographic area.

As such, we believe it would be irresponsible for the Town Board to continue to allow the piecemeal review of these projects, especially in the midst of its critical update and revision to the Town's outdated Comprehensive Plan. In this community planning context, it is even more essential that the Town secure the benefit of understanding the collective impacts that these projects may impart on Calverton and throughout the Town in general.

For these reasons, we implore the Town Board to take immediate action in the public's interest, by adopting a moratorium and initiating a GEIS to evaluate these proposals. These important local planning procedures are specifically designed to assure an assessment of the full impact of these concurrent proposals, and to evaluate the opportunities for impact mitigation and reasonable development alternatives.

Thank you for taking the opportunity to review our comments.

Sincerely,

Rex Farr, President
EPCAL Watch

Toqui Terchun, President
Greater Calverton Civic Association

Laura Jens-Smith, President
Greater Jamesport Civic Association

Robert S. DeLuca, President
Group for the East End

Cindy Clifford, President
Steven Kramer, Vice President
Juan Micieli-Martinez, Secretary/Treasurer
Heart of Riverhead Civic Association, Executive Board

Mark Haubner, President
North Fork Environmental Council

Phil Barbato, President
Riverhead Neighborhood Preservation Coalition

Sid Bail, President
Wading River Civic Association

Cc: Town of Riverhead Planning Board
Jefferson Murphree, Building and Planning Administrator
Legislator Al Krupski, Suffolk County Legislative District #1

Proposed Industrial/Commercial Warehouse Uses Calverton



Approximately 3.5 Miles

- #1 HK Ventures - (4285 Middle Country Road, Calverton) - 423,000+ sq. ft.
- #2 Calverton Industrial Subdivision - (3511 Middle Country Road, Calverton) - 410,000+ s. ft.
- #3 POD Storage - (3651 Middle Country Road, Calverton) - 45,000+ sq. ft.
- #4 Riverhead Logistics Center (1743 Middle Road, Calverton - 641,000+ sq. ft.
- #5 RGR Ventures - (East side of Manor Road, Calverton) - 28,000+ sq. ft.
- #6 EP Equity Holdings Four LLC - (582 Edwards Avenue, Calverton) - 28,000+ sq.ft.
- #7 EPCAL - (Calverton) - 1,000,000+ sq.ft. (Phase I) + 9,000,000+ sq. ft. (Future Potential)

TOTAL - Minimum of 2,575,000+ sq.ft. TOTAL with Future EPCAL Potential 11,575,000+ sq. ft.