CHAPTER 11

ANALYSIS OF ALTERNATIVES

INTRODUCTION

This chapter considers several alternatives to the Proposed Action. As described in Chapter 1, "Project Description," the objective of the proposed action is to acquire fee simple and conservation easement interests to protect environmentally-sensitive land in the New York City (City) watershed as a part of the City's overall Watershed Protection Program. LAP is a key component of the City's efforts to continue to provide high quality drinking water without filtration of the Catskill-Delaware (Cat-Del) System,[1] which provides water to over 9 million residents of the City and other communities in New York State. The program is mandated under the 2007 USEPA Filtration Avoidance Determination (FAD). Land acquisition was similarly a key component of the 1997 and 2002 FADs.

The State Environmental Quality Review Act (SEQRA) and City Environmental Quality Review (CEQR) process require that alternatives to the proposed action be identified and evaluated as part of the EIS process. The alternatives analysis should: (1) present reasonable options for reducing or eliminating project impacts, while substantively meeting project goals and objectives; (2) demonstrate a reasonable range of options to the proposed action; and (3) compare potential impacts under alternative approaches for meeting project objectives. The range of alternatives to be considered is determined by the nature, goals, and objectives of the specific action and its potential impacts, as disclosed by the technical impact assessments (see Chapters 2 through 10).

Each alternative is to be described to the extent that impacts can be compared with the impacts identified for the proposed action. Therefore, the level of detail in the analysis is dependent on the alternative and the project impacts. When limited impacts are identified, a qualitative assessment is appropriate. Where a significant impact of the proposed action has been disclosed, or where the alternative may disclose a significant impact in an area where the proposed action had none, it is appropriate to provide additional detail on impacts under the alternative.

This chapter of the EIS assesses the impact of three alternatives to the Extended LAP (the proposed action as described in Chapter 1). It examines the potential impact of alternatives to the proposed action on land use, socioeconomic conditions, community character and other conditions in the watershed. The following alternatives will be evaluated in this chapter:

- The "No Action" alternative; since LAP is a requirement of the FAD, this alternative assumes that New York City's water supply would be filtered.

[1] Although the Catskill watershed and Delaware watershed are distinct geographical features, they are functionally managed together and for regulatory purposes are considered a single integrated system.

- A Lesser-Impact Alternative; in which the amount of land to be acquired under the Extended LAP in fee simple and through conservation easements is 10 percent less than estimated in the 10 Year Projection Scenario; and

- A No Hamlet Expansion Alternative in which the amount of land to be acquired is the same as under the Extended LAP in fee simple and through conservation easements, but the proposed hamlet expansions discussed in Chapter 1 are eliminated. The original hamlet areas designated pursuant to the MOA would remain in place – but they would not be expanded. Other aspects of the program would remain the same as analyzed under the Proposed Action.

Each of these alternatives is examined below.

The DEIS also considered a Greater Impact Alternative in which NYCDEP would acquire 10 percent more land than projected in the 10 Year Projection Scenario and the NYCDEP Land Acquisition Program is extended for five additional years, through 2027. The FEIS includes this alternative as part of the proposed action as "the 15 Year Greater Impact Scenario" as described in Chapter 1 and as assessed throughout the EIS as applicable.

NO ACTION ALTERNATIVE

The No Action Alternative presents environmental conditions that would exist if the proposed action were not implemented. The assessment of the No Action Alternative is required for all Environmental Impact Statements (EISs).

The No Action Alternative would put the City in violation of the 2007 Filtration Avoidance Determination (FAD) issued by USEPA, which requires the City to pursue the Land Acquisition Program. If the City does not comply with the 2007 FAD, NYSDOH could require that the Catskill/Delaware System be filtered. Filtration of the Catskill/Delaware System would require the siting, design, construction, and operation of a drinking water filtration plant and could result in potential environmental impacts to the local community where the facility is sited and considerable costs to water and sewer ratepayers.

For this EIS, the Proposed Action is the acquisition of a new Water Supply Permit to allow for the continued acquisition of land under the Land Acquisition Program. It is not within the scope of the environmental review, nor is it reasonable or proper to assess the entire Long-Term Watershed Protection Program or FAD requirements within this review.[1] Nor is it required under SEQRA that a cost-benefit analysis be conducted of LAP compared to other elements of the FAD. The analysis included cumulative effects from other FAD requirements to the extent they are overlapping and could result in potential significant adverse impacts such as the Watershed Rules and Regulations limits on development in certain areas of the watershed. It has been determined, based on the analysis in this EIS, that the Extended LAP will have a beneficial

[1] The entire Long Term Watershed Protection Program was the subject of a previous environmental review that resulting in a Negative Declaration, dated September 2007.

effect on water quality and no potential significant adverse impacts on land use, community character, or socioeconomic conditions.

Under the No Action Alternative, in the West-of-Hudson and East-of-Hudson Watersheds, the Land Use, Community Character Socioeconomic, Water Quality and Open Space conditions would be the same as those discussed under the *Future Conditions Without the Proposed Action* sections in each chapter above.

LESSER IMPACT ALTERNATIVE

This section discusses the potential impacts of an action in which NYCDEP acquires 10 percent less land than was projected in the 10 Year Projection Scenario for the proposed action in Chapter 1, *Project Description*. Based on this approach, NYCDEP acquisitions in fee simple and conservation easements in the West-of-Hudson watershed between 2010 and 2022 would total 72,853 acres, as compared with 80,948 acres through 2022 in the 10 Year Projection Scenario. Purchases of farm easements by the Watershed Agricultural Council from 2010 through 2022 would total 14,400 acres, as compared to 16,000 acres through 2022 in the Proposed Action's r10 Year Projection Scenario.

SOCIOECONOMIC CONDITIONS

West-of-Hudson

Impacts on Supply of Developable Land

This section discusses the Lesser Impact Alternative's projected potential impact through 2022 on the supply of developable land in watershed towns. This alternative uses the same process as that described in Chapter 3 to project remaining developable land in 2022. After removing towns with less than 5 percent of their area within the watershed, a four-step process was undertaken to estimate the impact of NYCDEP's Extended LAP program on developable land at the town level through 2022.

Step 1: Assume the same amount of available developable land in 2009 as determined in Chapter 3.
Step 2: Assume the same 10 Year Projection Scenario rate of housing demand as determined in Chapter 3.
Step 3: Assume that NYCDEP will acquire ten percent less land than the 10 Year Projection Scenario, and estimate the portion of those lands that are developable.
Step 4: Estimate remaining developable land in 2022 after housing demand and LAP acquisitions.

The amount of developable land acquired was estimated using the methods described in the *Methodology* section above.

The town-by-town results of this analysis are presented in Table 11-1, (The towns are ranked in descending order of the percentage of the town's 2009 supply of developable land remaining in 2022.) The analysis suggests that all 34 towns have sufficient land available to accommodate

both the projected acquisitions under LAP, and the projected rate of residential development through 2022.

As Table 11-1 shows, for the 34 towns collectively, land to be acquired by LAP between 2010 and 2022 represents about 9.7 percent of 2009's available developable land; and new residential development over that time period is estimated to consume 5.5 percent. (It was estimated in Chapter 3 that under the proposed action, the land to be acquired by LAP between 2010 and 2022 would represent 10.8. percent of the 34 towns' 2009 supply of developable land, and that new residential development during the same period would consume 5.5 percent.) For the 34 towns as a whole, approximately 84.8 percent of 2009's available developable land would still remain in 2022, as compared with 83.7 percent under the 10 Year Projection Scenario. Each town would have at least 68 percent of its 2009 supply of developable land remaining in 2022, as compared with a minimum of 66 percent under the 10 Year Projection Scenario. As discussed above and in Chapter 3 in detail, due to the very conservative nature of the analysis, the percentage of developable land remaining in 2022 is likely to be higher.

For the region as a whole, the impact of the Lesser Impact Alternative on the availability of land for development would not differ materially from the impact of the proposed action, as assessed in Chapter 3. In neither case would the projected level of acquisition significantly constrain new development in the West-of-Hudson watershed between 2010 and 2022.

Table 11-1 Remaining developable acreage in 2022, by town, after Extended LAP activity minus 10 percent and development through 2022. (Cells with bold and yellow show where criteria for more detailed town level assessment was met or exceeded.)

County	Town	Available developable acres, 2009	Projected developable land acquired through 2022 - 10%	Developable land needed for housing through 2022	Developable land left in 2022	% of 2009 developable land left in 2022	LAP contribution	Housing contribution
Greene	Lexington	3,475	784	314	2,377	68.4%	**22.6%**	9.0%
Ulster	Denning	4,187	1,223	71	2,893	69.1%	**29.2%**	1.7%
Greene	Prattsville	2,773	738	100	1,935	69.8%	**26.6%**	3.6%
Ulster	Olive	5,684	784	748	4,152	73.0%	13.8%	**13.2%**
Ulster	Hardenburgh	2,692	572	166	1,954	72.6%	**21.2%**	6.2%
Greene	Ashland	3,351	628	260	2,463	73.5%	18.7%	7.8%
Sullivan	Neversink	12,797	1,778	1,501	9,517	74.4%	13.9%	**11.7%**
Schoharie	Conesville	5,525	860	560	4,105	74.3%	15.6%	**10.1%**
Greene	Windham	5,272	792	540	3,940	74.7%	15.0%	**10.2%**
Greene	Halcott	1,668	350	79	1,238	74.2%	**21.0%**	4.8%
Ulster	Shandaken	1,444	167	186	1,091	75.6%	11.5%	**12.9%**
Delaware	Andes	7,221	1,325	486	5,410	74.9%	18.3%	6.7%
Delaware	Stamford	4,939	1,068	199	3,673	74.4%	**21.6%**	4.0%
Greene	Jewett	6,292	947	511	4,835	76.8%	15.1%	8.1%
Delaware	Hamden	6,146	652	701	4,793	78.0%	10.6%	**11.4%**
Delaware	Middletown	7,455	1,072	513	5,870	78.7%	14.4%	6.9%
Greene	Hunter	6,722	1,049	348	5,324	79.2%	15.6%	5.2%
Delaware	Delhi	5,851	891	264	4,695	80.2%	15.2%	4.5%
Ulster	Woodstock	6,759	755	479	5,524	81.7%	11.2%	7.1%
Delaware	Bovina	3,726	640	68	3,019	81.0%	17.2%	1.8%
Delaware	Roxbury	5,927	856	216	4,855	81.9%	14.4%	3.6%
Delaware	Walton	8,845	1,141	329	7,375	83.4%	12.9%	3.7%
Delaware	Tompkins	10,947	1,094	572	9,282	84.8%	10.0%	5.2%
Delaware	Kortright	8,370	567	406	7,397	88.4%	6.8%	4.9%
Ulster	Hurley	5,003	120	410	4,473	89.4%	2.4%	8.2%
Schoharie	Jefferson	8,722	187	639	7,895	90.5%	2.1%	7.3%
Delaware	Meredith	13,063	742	469	11,852	90.7%	5.7%	3.6%
Schoharie	Gilboa	10,583	643	251	9,690	91.6%	6.1%	2.4%
Delaware	Masonville	10,890	375	447	10,068	92.5%	3.4%	4.1%
Ulster	Wawarsing	23,610	863	802	21,946	93.0%	3.7%	3.4%
Delaware	Deposit	4,052	21	230	3,800	93.8%	0.5%	5.7%
Delaware	Colchester	9,406	211	296	8,899	94.6%	2.2%	3.1%
Delaware	Harpersfield	9,959	280	200	9,479	95.2%	2.8%	2.0%
Delaware	Franklin	19,006	343	520	18,142	95.5%	1.8%	2.7%
	TOTAL	**252,361**	**24,516**	**13,883**	**213,963**	**84.8%**	**9.7%**	**5.5%**

Table 11-1 highlights the towns in which, even under the Lesser-Impact Alternative, the projected level of acquisitions between 2010 and 2022 accounts for at least 20 percent of the Town's 2009 supply of developable land, or the projected level of residential development consumes at least 10 percent of that supply – the thresholds used in Chapter 3 to identify towns for further review. More detailed assessments of the nine of the towns highlighted in yellow in Table 11-1 are already included in Chapter 4.

In the remaining 25 towns (those not shaded in yellow in Table 11-1), the percentage of the town's 2009 supply of developable land still remaining in 2022 ranges from 73.5 to 95.5 percent.

Table 11-2 lists six towns where the supply of developable land in 2009 is estimated to be less than 10 percent of the town's total land area, or less than 3,000 acres.

Table 11-2: Towns with less than 10 percent or fewer than 3,000 acres of developable town area land remaining in 2009 under Lesser Impact Alternative

County	Town	Total town land	Available developable acres, 2009	Developable land left in 2022	% of town area developable, 2009	% of town area developable, 2022
Ulster	Shandaken	78,875	1,444	1,091	1.8%	1.4%
Ulster	Hardenburgh	51,756	2,692	1,954	5.2%	3.8%
Ulster	Denning	65,430	4,187	2,893	6.4%	4.4%
Greene	Lexington	51,274	3,475	2,377	6.8%	4.6%
Greene	Halcott	14,375	1,598	1,238	11.1%	8.6%
Greene	Prattsville	13,786	2,773	1,935	20.1%	14.0%

Other Socioeconomic Conditions, Land Use and Community Character

A 10 percent decrease in the acreage projected to be acquired under the Extended LAP would have very little effect on the program's impact on socioeconomic conditions, land use patterns or the character of communities in the watershed. Such a reduction could marginally reduce the potential for conflicts in a few towns between the Extended LAP and the need for land for future development – but the effect would not be substantial. There could be a marginal reduction in the potential for displacement of mining or timber harvesting as a result of acquisition of land by NYCDEP; but as discussed in the Greater Impact Alternative analysis, the potential for such displacement does not appear to be significant in any case. A 10 percent reduction in the acreage to be acquired could also result in a commensurate reduction in the areas that could be opened by NYCDEP for public recreational use.

A 10 percent reduction would be unlikely to affect hamlet areas and village centers in the watershed towns, since the reduction in land to be acquired would generally take place outside these areas.

East-of-Hudson

As noted in Chapters 2 and 3, the impact of the proposed action on land use, community character and socioeconomic conditions in the East-of-Hudson region would be quite limited – primarily because the amount of land projected to be acquired in the East-of-Hudson region under the proposed action totals only 1,517 acres, spread across four towns.

Under the Lesser Impact Alternative, the land to be acquired in the East-of-Hudson watershed region would decline by 10 percent, to 1,365 acres of which developable land would total 484 acres (see Table 11-3).. There would be slightly less potential for conflict between the Extended LAP and the need for land to accommodate new development than in there would be under the proposed action – but in either case, the impact would be negligible.

Table 11-3: Lesser Impact Alternative in East-of-Hudson towns

County	Town	Available developable acres, 2009	Projected developable land acquired through 2022 (-10%)	Developable land needed for housing through 2022	Developable land left in 2022	% of 2009 developable land left in 2022	LAP contribution	Housing contribution	% of town area developable, 2009	% of town area developable, 2022
Dutchess	East Fishkill	4,192	106	1,516	2,570	61.3%	2.5%	36.2%	11.4%	7.0%
Putnam	Carmel	1,520	73	842	605	39.8%	4.8%	55.4%	6.3%	2.5%
Putnam	Kent	2,096	296	180	1,621	77.3%	14.1%	8.6%	7.8%	6.0%
Putnam	Putnam Valley	5,560	9	569	4,982	89.6%	0.2%	10.2%	20.2%	18.1%
	TOTAL	**13,368**	**484**	**3,107**	**9,777**	**73.1%**	**3.6%**	**23.2%**	**11.4%**	**8.3%**

WATER QUALITY AND NATURAL RESOURCES, OPEN SPACE

As described in Chapter 5, *Water Quality and Natural Resources,* and Chapter 6, *Open Space and Recreation*, LAP provides benefits to water quality, natural resources and open space. If NYCDEP acquires 10 percent less land than the proposed action, these benefits may be reduced, but the action would still provide benefits.

CULTURAL RESOURCES

Under the Lesser Impact Alternative, the same protocol as described in Chapter 7, *Cultural Resources,* would be applied with respect to protecting and preserving historical and archaeological resources.

NO EXPANSION OF DESIGNATED HAMLET AREAS

The final alternative to be considered is one in which there would be no expansion of designated hamlet areas. The hamlet areas originally designated by watershed towns pursuant to the 1997 MOA would remain in place and LAP activity would not occur in these areas to the extent these towns have precluded acquisitions. This alternative is being considered because the negotiations over the Extended LAP with stakeholders are ongoing and the hamlet expansions are under discussion, although NYCDEP has agreed and remains committed to including the expanded hamlet areas. For this alternatives analysis, it is assumed that the total amount of land to be acquired by NYCDEP in fee simple or through conservation easements or by WAC would remain as described in Chapter 1. Without the expanded hamlets, however, this alternative assumes that some of the land acquired would be in the areas proposed for hamlet expansions.

Because the MOA did not provide for designation of hamlet areas east of the Hudson, the proposed action (as described in Chapter 1) does not include expansion of hamlet areas in East-

of-Hudson towns. The No Hamlet Expansion Alternative would thus not affect the analysis of the East-of-Hudson region and is not considered here.

Table 11-4 shows the number of acres included in each town's designated areas pursuant to the MOA and the number of acres in the proposed expansion areas. As shown, the proposed expansion areas cover a total about 26,700 acres.

Among the 16 towns in which hamlet expansions have been proposed, the impact of not expanding the designated hamlet areas is likely to vary from town to town, based on a number of factors:

- The scale of LAP acquisitions in the town through 2027, and their projected impact on the town's supply of developable land;
- The pace and location of new development in the town, the acreage required to support it, and its projected impact on the supply of developable land;
- The extent to which any major development planned for the towns are known to be located within the proposed expansion areas;
- The size of the proposed expansion areas, relative to the overall size of the town;
- The acreage within the proposed expansion areas already solicited by LAP; and
- LAP's projected "success rate."

Broadly speaking, eliminating the proposed hamlet expansions would not necessarily alter the total amount of land to be acquired within the 16 affected towns – but it would affect where the acquired land is located, and the potential for conflict between projected LAP acquisitions and requirements for land to support projected future development.

Table 11-5:

- Highlights the size of each proposed expansion area relative both the existing MOA designated hamlet areas, and to the size of the town as a whole;
- Identifies the amount of land within each expansion area already solicited by NYCDEP or potentially available for WAC easements; and
- Projects the acreage that NYCDEP and WAC might acquire[1] in what would have been each town's proposed expansion areas.

This calculation suggests that under the No Hamlet Expansion Alternative, 3,975 acres could be acquired in fee, CEs or WAC within the proposed expansion areas of the 15 towns where the parties have reached agreement on the proposed hamlet expansions, and potentially more than 700 additional acres in the area Walton has proposed to add to its 1997 designated areas

[1] Based on NYCDEP's projected "success rate," based on past experience, that it could potentially acquire through 2022; and an assumption that, for the West-of-Hudson watershed as a whole, WAC will succeed in acquiring easements on about 18 percent of all potentially eligible farm land.

Table 11-4: Number of acres in existing designated hamlet areas, and proposed hamlet expansions, by town

County/Town	Existing Designated Hamlet Area, Acres	Proposed Expansion, Area Acres	Total area, acres
Delaware County			
Andes	1,052	0	1,052
Bovina	392	0	392
Delhi	2,346	2,556	4,902
Hamden	420	2,434	2,854
Harpersfield	405	1,298	1,703
Kortright	250	3,664	3,914
Masonville	n/a	150	150
Meredith	73	71	144
Middletown	1,734	298	2,032
Roxbury	957	435	1,392
Sidney	n/a	218	218
Stamford	1,331	0	1,331
Tompkins	109	0	109
Walton	1,503	2,929	4432
SUBTOTAL	**10,572**	**14,053**	**24,625**
Greene County			
Ashland	362	1,676	2,038
Halcott	69	0	69
Hunter	3,251	2,891	6,142
Jewett	652	2,014	2,666
Lexington	362	375	737
Prattsville	207	0	207
Windham	1,148	2,797	3,945
SUBTOTAL	**6,051**	**9,753**	**15,804**
Schoharie County			
Conesville	275	1,570	1,845
Ulster County			
Denning	1,107	0	1,107
Olive	547	1,333	1,880
SUBTOTAL	**1,654**	**1,333**	**2,987**
Sullivan County			
Neversink	1,197	0	1,197
Shandaken	1,561	0	1,561
SUBTOTAL	**2,758**	**0**	**2,758**
TOTAL	**21,310**	**26,709**	**48,019**

Table 11-5: Solicited acres and projected fee and CE acquisitions in proposed expansion areas

Town	MOA designated acres	Proposed expansion acres	PEA as % of total town acres	Solicited acres in PEA	Success rate	Projected fee and CE acquisitions in PEA	Acres in MOA PEA Available for WAC CE	Projected WAC CE in PEA/MOA	Total DEP and WAC Acres Projected
Delhi	2,346	2,556	6%	891	20%	178	818	147	325
Hamden	420	2,434	6%	776	20%	155	1,027	185	340
Harpersfield	405	1,298	5%	370	20%	74	847	152	226
Kortright	250	3,664	9%	1,372	20%	274	1,743	314	588
Masonville	0	150	0%	0	20%	0	0	n.a.	0
Meredith	73	71	0%	60	20%	12	17	n.a.	12
Middletown	1,734	298	0%	208	20%	42	48	n.a.	42
Roxbury	957	435	1%	104	20%	21	342	62	83
Sidney	0	218	1%	34	20%	7	0	n.a.	7
Walton	1,503	2,929	5%	889	20%	178	1,169	210	388
Ashland	362	1,676	10%	997	27%	269	17	n.a.	269
Hunter	3,251	2,891	5%	1,744	27%	471	0	n.a.	471
Jewett	652	2,014	6%	556	27%	150	0	n.a.	150
Lexington	362	375	1%	375	27%	101	0	n.a.	101
Windham	1,148	2,797	10%	1,429	27%	386	0	n.a.	386
Conesville	275	1,570	6%	449	25%	112	583	105	217
Olive	547	1,333	3%	243	25%	61	0	n.a.	61
Total	**14,285**	**26,709**		**10,497**		**2,491**	**6,611**	**1,175**	**3,666**

As shown in Table 11-5, the size of the proposed expansion area (PEA) as a proportion of the Town's total area varies from town to town. In some towns, the number of acres that the Extended LAP could potentially acquire in what had been the proposed expansion areas for this and other reasons, would be relatively small. In others, the proposed expansion areas represent a much larger share of the Town's total area – as much as 10 percent in Ashland – and the number of acres that the Extended LAP could acquire in these areas could also be larger –in Windham, Hunter, Kortright and Walton, potentially about 400 acres or more.

Taking into account the factors outlined above, there appear to be 10 towns where elimination of the proposed hamlet expansions could have the greatest impact. The potential impact of the No Hamlet Expansion Alternative in each of these towns is discussed below.

Windham

As shown in Table 11-4, the proposed expansion of Windham's designated hamlet area is 2,797 acres that would bring the designated area to a total of 3,945 acres. Since development pressures have been stronger in Windham in recent years than in any other West-of-Hudson town, the demand for land within the proposed expansion areas during the next decade could potentially be strong. As discussed in Chapter 4, much of Windham's recent development has tended to occur on small parcels in the proposed expansion area. As shown in Table 11-5, nearly two-thirds of the land in the expansion areas has already been solicited by NYCDEP. If a significant portion of the land in the proposed expansion area were to be acquired under the Extended LAP, the result in some cases could be to shift new development away from the edge of the Town's core hamlets, and toward outlying areas in Windham. Other projects that might be feasible only in or near the Town's principal hamlets ranging from higher density housing to resort-related development could potentially not occur at all.

Hunter

Agreement has also been reached among the parties on expansion of Hunter's designated areas by 2,891 acres, to a total of 6,142 acres. These additional designations would provide space to accommodate growth on the outskirts of the Villages of Hunter and Tannersville, and along a portion of Route 23A. As shown in Table 11-5, more than two-thirds of the land in the expansion areas has already been solicited by NYCDEP. As in Windham, acquisition of any significant portion of the proposed expansion areas through the Extended LAP could result in some development projects shifting toward outlying areas of the Town – or in some projects that need a relatively close-in location not being undertaken at all.

Ashland

The impact of the No Hamlet Expansion Alternative could be particularly significant in Ashland, for several reasons. The proposed expansion areas represent a significant portion of the Town's total area; and about 60 percent of the land within the expansion areas has already been solicited by NYCDEP. The town has been one of the fastest-growing in the watershed during the past decade; acquisition of portions of the proposed expansion areas under the Extended LAP could, as in Hunter and Windham, shift some of the anticipated development to outlying areas.

Jewett

While somewhat less vulnerable than the three towns cited above, Jewett could also be affected by the elimination of the proposed hamlet expansion. The percentage of the Town's total area that would be included within the proposed expansion area is lower than in Windham or Ashland; and the percentage of land within the expansion area already solicited by NYCDEP is also lower. Thus, while the No Hamlet Expansion Alternative might result in some shifting of development from the expansion areas to outlying areas of the Town, such shifts would likely be less extensive in Jewett than in Windham, Hunter or Ashland.

Conesville

Because the hamlet areas originally designated by the Town are relatively small – totaling only 275 acres – expansion may be particularly important for providing room for further development in Conesville. The percentage of land within Conesville's expansion area already solicited by NYCDEP is 29 percent. The acreage which might be acquired by NYCDEP in this area (112 acres) and as noted in Table 11-5, WAC easements could add another 105 acres to this total.

Delhi

Delhi's proposed hamlet expansion is among the largest – both in acres and as a percentage of the Town's total area. The percentage of land within the area already solicited by NYCDEP is relatively low (40 percent). Nevertheless, the acreage that could potentially be acquired either in fee simple or through NYCDEP and WAC easements is substantial – a total of 325 acres, as shown in Table 11-8. Because there is relatively little land available for development within the Village of Delhi – Delaware County's largest village, the County seat, and the principal center of civic and commercial activity for much of the County – ensuring the availability of land for development beyond the originally-designated hamlet area may be important to the Town's future. It could be particularly important, for example, for the development of a supply of rental housing that is adequate to meet the needs of both SUNY students and full-time residents, and to the development of housing that is affordable for county, municipal, SUNY and other public employees.

Hamden

As noted in Chapter 3, past WAC easements in Hamden have removed land from potential development in and near the Town's existing designated hamlet areas. Under the No Hamlet Expansion Alternative, this problem could be aggravated by the potential acquisition of WAC easements on 185 additional acres, and additional 155 acres acquired by NYCDEP totaling 340 acres, within what would have been Hamden's proposed hamlet expansion area.

Harpersfield

Because the amount of land already solicited by NYCDEP in Harpersfield's proposed expansion area is relatively small, projected acquisitions in fee simple or through NYCDEP conservation within this area total only 74 acres. However, WAC easements (as shown in Table 11-5) could add 152 acres to this total, increasing the potential for conflict between future acquisitions the need for land to accommodate new development.

Kortright

As noted in Chapter 3, the land projected to be acquired in fee simple or through conservation easements in Kortright under the Extended LAP includes only 5 percent of the Town's estimated supply of developable land as of 2009. At first glance, it might thus appear that the town does not need a major expansion of its designated hamlet area in order to ensure the availability of land to support future development. However, because of the remote location of the northern parts of Kortright, the southern portion of the Town may offer the best prospects for future development. It thus may be particularly important for Kortright to ensure the availability of land in the south, rather than shifting development into more remote areas. Under the No Hamlet Expansion Alternative, it is projected that NYCDEP and WAC could, as shown in Table 11-5, acquire 588 acres within what had been the Town's proposed hamlet expansion areas.

Walton

Walton's proposed hamlet expansion totals 2,929 acres, making it one of the largest of the 16 proposed expansions. Roughly 30 percent of the land that would be covered by the proposed expansion has already been solicited by NYCDEP. Elimination of the proposed hamlet expansion could thus result in NYCDEP and WAC acquisition of more than 889 acres within the expansion area. In Chapter 3 it was projected that as of 2027 Walton would still have 79 percent of its 2009 supply of developable land remaining, after taking into account projected LAP acquisitions and projected residential development. While in the aggregate the Town's supply of developable land may be adequate, it is important to note that commercial and industrial activity in the town are heavily concentrated in and around the Village of Walton. Ensuring the availability of land in this area may thus be important to future development of the Town's economy.

Other Socioeconomic Conditions, Land Use and Community Character

Overall, elimination of the proposed hamlet expansions could have several negative effects on land use, socioeconomic conditions and community character in watershed towns. It could result in new development "leapfrogging" the proposed expansion areas, and shifting to locations further away from the existing hamlets and village centers. Because development in outlying locations is likely to be at lower densities, eliminating the proposed hamlet expansion could result in greater consumption of land for any given level of development. It could also increase the distance that residents need to travel for shopping and basic services with associated increased traffic, air and noise generation. The potential for development to leapfrog to outlying

areas could reduce somewhat the Extended LAP's contribution to preserving the low density, rural character and high-quality natural environment that many residents of watershed towns wish to preserve.

Eliminating the proposed expansion would not support the ongoing efforts toward economic and community revitalization in the region's hamlets and village centers – a priority for many West-of-Hudson watershed towns. In some cases, acquisition of land or easements in these areas by NYCDEP or WAC could result in certain types of development (that which requires relatively close-to-town locations) not occurring at all. Examples of such development could include housing for older residents – other affordable housing – and higher-density residential development around ski centers. Any extensive acquisition of land or easements in these areas by either NYCDEP or WAC could also have the effect of precluding the expansion of existing commercial or industrial businesses – or the development and growth of new businesses – within the affected areas.

Implementation of the Extended LAP without the proposed hamlet expansions could thus potentially lead to a conflict within the hamlet expansion areas between the projected level of acquisitions under the Extended LAP and community character and economic development goals including the need for land to support affordable and higher density housing and commercial businesses which typically would occur in these areas as well as maintaining rural character and natural resources in outlying areas.

WATER QUALITY AND NATURAL RESOURCES, OPEN SPACE

As discussed in Chapter 5, *Water Quality and Natural Resources*, concentrating growth in designated areas is a principle of smart growth and a means of reducing sprawl and growth of impervious cover in sensitive areas of the watershed. Land Acquisition under the No Hamlet Alternative would still provide water quality benefits; however, development may occur in areas that are more sensitive to water quality, and the benefits of the Extended LAP may not be as fully realized.

CULTURAL RESOURCES

Under the No Hamlet Expansion Alternative, the same protocol as described in Chapter 7, *Cultural Resources*, would be applied with respect to protecting and preserving historical and archaeological resources.