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## **MEMORANDUM**

To: Heather Lanza, AICP, Town Planning Director

Date: August 20, 2026

Subject: **Strong's Yacht Center Revised Site Plan Submission Comparison**



As requested, we have reviewed the Amended Revised Site Plan Application submission materials received by the Lead Agency in July 2025 for the Strong's Yacht Center Project. The submission materials reviewed are as follows:

- A Site Plan Application Form dated 7/18/24; and
- An LWRP Consistency Assessment Form dated 7/19/24; and
- A Full EAF Part 1 Form dated 7/19/24; and
- A Revised Site Plan (13 sheets) dated 7/19/24; and
- A Tree Removal Plan dated 10/1/24; and
- A Proposed Landscaping Plan (2 sheets) dated 10/1/24; and
- A Floor Plan and Building Elevations Plan (3 sheets) dated 10/1/24.

## **Project Overview**

Previously, the Strong's Yacht Center Proposed Boat Storage Buildings (the "Proposed Action") included the construction of two, one- story buildings of 52,500 SF and 49,000 SF for the purpose of providing indoor winter storage of larger yachts, up to 86 feet in length. A Draft Environmental Impact Statement ("DEIS") dated December 2021, revised November 2022, was prepared and accepted as complete and adequate for public review by the Planning Board, as Lead Agency, on March 13, 2023 (the "revised 2022 DEIS"). The FEIS was prepared by the Planning Board, and the Notice of Completion was filed on May 6, 2024. The Town Planning Board then began to prepare the SEQRA Findings Statement (the "Findings"). The Findings were halted in anticipation of a revised Site Plan application to be submitted by the Applicant. The Town of Southold received a revised plan dated July 19, 2024, and an amended revised site plan on July 16, 2025 (the "Amended Revised Site Plan"). Review of the Amended Revised Site Plan was halted when the project was referred to the Zoning Board of Appeals for an interpretation based on the proposed height of the building. Once the issue was determined not to require a variance for building height on March 5, 2026, the review of the Amended Revised Site Plan was renewed. The following comparison of the application materials and recommendations has been prepared for the Lead Agency's review with respect to the continuation of the SEQRA review process.

## **Project Comparison**

The original application submitted in 2018 proposed 101,500 SF of boat storage area to be contained in two buildings (Building No. 1 at 52,500 SF & Building No. 2 at 49,000 SF). The Amended Revised Site Application now proposes one yacht storage building, which is 62,310 SF in size. The revisions to the proposal have resulted in changes to various metrics as a result (i.e. area of disturbance, tree clearing, etc.). Key differences in the application are summarized in the table below and only account for how the application analyzed in the revised 2022 DEIS and the Amended Revised Site Application are represented in their respective submission materials and does not account for potential flaws in representations in those submissions.

| <b>Comparison of Impacts</b>                                                                                                                                                                                                                                |                      |                     |                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------|-----------------------|
|                                                                                                                                                                                                                                                             | <b>Original Plan</b> | <b>Current Plan</b> | <b>Percent Change</b> |
| <b>Disturbed Area</b>                                                                                                                                                                                                                                       | 6.51 acres           | 5.17 acres          | -20.6%                |
| <b>Cut</b>                                                                                                                                                                                                                                                  | 135,000 CY           | 83,650 CY           | -38%                  |
| <b>Building Area</b>                                                                                                                                                                                                                                        | 101,500 SF           | 62,310 SF           | -39%                  |
| <b>Total Construction Duration</b>                                                                                                                                                                                                                          | 13 months            | 8.4 months          | -35.4%                |
| <b>Excavation Duration</b>                                                                                                                                                                                                                                  | 5.5-6.5 months       | 2.9-3.4 months      | -47.7%                |
| <b>Total Excavation Truck Trips</b>                                                                                                                                                                                                                         | 9,000                | 5,578               | -38%                  |
| <b>Average Excavation Trucks Per Day</b>                                                                                                                                                                                                                    | 8                    | 7.75                | -3%                   |
| <b>Mature Tree Removal</b>                                                                                                                                                                                                                                  | 634                  | 477                 | -24.8%                |
| <b>Coastal Oak-Beech Forest Clearing</b>                                                                                                                                                                                                                    | 4.32 acres           | 2.85 acres          | -34%                  |
| <b>Southern Successional Forest Clearing</b>                                                                                                                                                                                                                | 1.19 acres           | 1.31 acres          | +10.00%               |
| Note: This data summarizes what has been presented by the Applicant in the revised 2022 DEIS and in the Amended Revised Site Plan and does not account for flaws or errors identified in the FEIS Notice of Completion filed on 5/6/24 or in this document. |                      |                     |                       |

The Amended Revised Site Application has been reviewed in the context of the large adverse impacts that cannot be mitigated as identified in the FEIS adopted by the Lead Agency in May 6, 2025. It is important to note that the comparison of the Amended Revised Site Plan to the proposal detailed in the revised 2022 DEIS is limited by the information made available in the Amended Revised Site Application. The information provided is not at the level of detail provided or analyzed in the DEIS. It is also important to note that a reduced scale alternative was identified in the scoping document for the DEIS; however, the DEIS described the reduced alternative as not being financially viable and did not provide additional analysis. Therefore, the reduced scale of the Amended Revised Site Application cannot easily be compared to any supporting analysis provided with the DEIS.

### **SEQRA Process**

As previously noted, the SEQRA process for the Project was suspended at the development of a Finding Statement for the previously proposed project. As the next steps in the process, the Revised Amended Site Plan Application will need to be evaluated by the Planning Board, as Lead Agency. An updated EAF has been submitted as part of the Amended Revised Site Plan application materials. Based on our review of the updated EAF, the following comments need to be addressed:

C.3.a – Zoning - R-80 should be added as a zoning district listed as there is clearing and construction of a haul road proposed through the portion of property in the R-80 zoning district.

C.4.d – Parks - In response to the question regarding the parks that serve the project site, the answer provided states that this question is not applicable because the project site is a maritime use. However, the revised 2022 DEIS noted that 'Building 1' on the project site contained a private one-story residence with a garage where the marina manager resides. The applicant should revise this response to list the surrounding parks that serve the project site.

D.2.a.ii – Construction - The calculation of 3.4 – 4.03 months assumes 30CY trucks at full load. For reasons elaborated upon later in this document and in the FEIS, it is our understanding that the 30CY trucks would not be able to carry full loads due to the weight of the material being hauled and the weight restrictions described in the revised 2022 DEIS. The Applicant should verify that the information presented in the EAF is correct.

D.2.d – Septic - The calculation for liquid waste generated of 9 gallons per day (gpd), should be verified by the Applicant. The calculation was questioned in the FEIS when the proposal included two buildings instead of one and was 18 gpd. The DEIS did not adequately justify the proposed 18 gpd estimate. The most recent correspondence with the SCDHS (DEIS Appendix J), dated January 26, 2022, includes a Notice of Non-Conformance and a request for additional information. The DEIS states that consultations with the SCDHS are ongoing and that the Application has requested a variance from design flow standards.

D.2.e – Impervious Surface - The answer includes an asterisk, but it is not clear what it is in reference to. Also, the calculation describes only what is new and does not describe the proposed total impervious surfaces in relation to project site.

D.2.f – Fuel Storage - This answer should be yes and the proposed heating system and fuel storage for the heating system should be described.

D.2.i – Construction - The applicant should confirm there will be no release of air pollutants from the open-air excavation of 83,650 CY of sand during construction.

D.2.m.ii - Grading - The answer should be yes and the changes to topography due to excavation and the proposed tree clearing should be described.

D.2.n.ii - Grading - The answer should be yes and the changes to topography due to excavation and the proposed tree clearing should be described.

D.2.p – Fuel Storage - The applicant should confirm the capacity of the proposed propane storage tank for the proposed heating system is below 1,100 gallons. The proposed propane storage tank described in the revised 2022 DEIS was larger and any revision to the storage tank has not been specified in the Amended Revised Site Application

E.2.f – Slope - The applicant has responded not for the Proposed Action site but “within project area only” which is an area that has not been defined.

E.2.n.iii – Habitat - This has not been filled out completely or correctly. It is our understanding that this question refers to the extent of the community or habitat in acres on the project site and the degree to which that habitat will be reduced on the project site.

E.2.e.iii – Historic Structures - The description of the Old Water Tower provided is not an adequate response to the question.

E.2.g – Archeology - This answer should be yes and should describe the findings of the Supplemental Phase 1B Archeological Assessment dated January 7, 2022.

With the revisions of the EAF, the Planning Board can evaluate the Amended Revised Site Plan Application and determine if previous concerns that were raised by the Board regarding the size and the scale of the project have been adequately addressed by the new proposal.

The FEIS also identified both flawed or incomplete analysis as well as significant adverse impacts that could not be mitigated. If the SEQRA process moves forward based on the Amended Revised Site Plan, these issues would need to be readdressed.

### **Comparative Analysis of Previously Identified Significant Adverse Impacts**

Please note that this section does not provide a comparative analysis of all of the environmental topic areas of the DEIS and FEIS. It focuses on the **unmitigated, significant** adverse impacts identified in the FEIS document which were related to the excavation stage of construction. These included traffic, noise, and vibration impacts associated with the 30CY haul trucks proposed to remove the excavated material. The Amended Revised Site Plan materials did not contain any new technical reports to be able to make a detailed comparison beyond the information provided in the "Comparison of Impacts" table in this memorandum.

The FEIS identified that, among other deficiencies in the estimation of construction related traffic, the revised 2022 DEIS and the Traffic Impact Study state that the construction truck traffic would not exceed weight limits established by State law and would comply with New York State Vehicle and Traffic law regarding the size of vehicles and the permissible weight of vehicles. The revised 2022 DEIS presented that the excavation of approximately 135,000 cubic yards of material would require 4,500 truckloads meaning 9,000 truck trips, 80 truck trips a day and an average of 8 truck trips an hour. However, the maximum allowable gross vehicle weight (MGVW) for trucks traveling most interstate highways in New York is 80,000 pounds. The DEIS states that the weight of the haul trucks proposed for construction is 32,500 pounds and the Gross Vehicle Weight of the vehicles is anticipated to be 107,000 pounds and there is no mention in the DEIS to the need for Divisible Load Overweight Permit obtained from the NYSDOT. Additionally, if the maximum weight of the haul trucks is assumed to be 107,000 pounds as stated in the DEIS, the weight of the trucks themselves is 32,500 pounds as stated in the DEIS, then the 30 cubic yards of material would need to weigh less than 74,500 pounds, or no more than 2,483 pounds per cubic yard.

In the Geotechnical Report (DEIS Appendix H), Table 6 states that Stratum 1 (Reddish-Brown Fine Sand) will account for approximately 43,851 cubic yards excavated material and Stratum 2 (Tan Medium Sand) will account for approximately 84,852 cubic yards of excavated material. Together, these two strata represent 96 percent of the excavated material to be removed from the Site. Table 1 in the same document provides information on the weight of the sands found at the Project site. According to Table 1 in the Geotechnical Report, Stratum 1 sands from the Project Area weigh 110 pounds per cubic foot or 2,970 pounds per cubic yard, and Stratum 2 sands weigh 115 pounds per cubic foot, or 3,105 pounds per cubic yard. Both would exceed the maximum of 2,483 pounds per cubic yard needed to keep a truck carrying 30 cubic yards below the maximum weight of 107,000 pounds as stated in the DEIS.

The Revised Amended Site Application does not include a revised Geotechnical Report addressing the revised excavation area or what percentages of Strata 1 & 2 are now present in the excavated material. But the revised FEA Part 1 and comparative narratives provided as attachments still base the excavation truck traffic calculations on full 30CY truck loads which likely underestimates the number of construction truck trips. It is important to note that assuming the trucks would not exceed the 107,000 pounds stated in the DEIS, the trucks could hold 25CY of stratum 1 at one time or 24CY

of stratum 2 at one time and if the haul trucks were made to comply with the State restrictions of 80,000 pounds, this would be even less.

The Revised Amended Site Application identifies 83,650 CY of excavated material to be removed from the Site over the course of 2.9-3.4 months. Assuming 30CY truck loads, which for reasons stated above is unlikely, this would require 2,789 truckloads of material to be removed resulting in 5,578 truck trips. Assuming 12 weeks, at 6 days a week, Monday-Saturday, 10 hour days, 5,578 truck trips over 72 days would be approximately 77.5 truck trips a day with an average of 7.75 truck trips per hour.

Comparing the Amended Revised Site Application to the revised 2022 DEIS, construction truck traffic would be 5,578 truck trips over 12 weeks, 77.5 truck trips a day, 7.75 trucks per hour, compared to 9,000 truck trips over 22 weeks, 80 truck trips a day, 8 trucks per hour. However, these calculations are based on the information provided in the FEAF Part 1 and assume full 30CY truck loads which is not likely based on weight restrictions. Therefore, it is expected that the number of truck trips will be greater than what is described here or that the weight of the trucks would exceed what is described.

The DEIS Alternatives 2 and 7 that analyzed reducing the excavated material needing removal from the Site or alternative modes of transportation for the removal of excavated material have not been updated by the Applicant with the revised submission. However, the alternative mode of transportation investigated was the use of barges along the Mattituck Inlet and was deemed infeasible by the Applicant in the revised 2022 DEIS and the method for reducing the amount of excavated material needing transportation from the Site would require additional ecological impacts on the site. This was estimated to be 13,500 CY of material and increasing the area of disturbance by 8.6 acres in the revised 2022 DEIS but comparative analysis for the Amended Revised Site Application has not been provided.

Construction traffic of the Amended Revised Site Plan would have an impact on traffic along the haul truck route, noise and vibration at the Site and along the haul truck route, and these impacts would also affect the community character, the public use of open spaces, and quality of life. The number of proposed truck trips has been reduced from the proposal analyzed in the revised 2022 DEIS, but since the construction timeline has also been reduced it still proposes 5,578 truck trips over 72 days which would be approximately 77.5 truck trips a day with an average of 7.75 truck trips per hour. The errors, unaddressed in the Amended Revised Site Plan, in the estimation of truck trips and weight suggest that either the number of truck trips required for excavation would be higher than what has been represented or that the weight of those trucks would be higher than what has been represented and so the noise and vibration impacts of those trucks would be greater.

### **Next Steps for the SEQRA Process**

Once the additional information has been provided in the updated EAF and the Planning Board has evaluated the reductions in the site plan, the Lead Agency will need to decide if the Proposed Action has been reduced enough to move forward. The Amended Revised Site Plan reduces the total amount of excavated material by 38% but also reduces the construction timeframe by 34.5%, resulting in drop from 80 to 77.5 daily truck trips during the excavation phase. Misrepresentations of maximum truck weight and capacity identified in the FEIS, and unaddressed and unchanged in the Amended Revised Site Plan, suggest that these numbers are low and that the daily truck trips required during the excavation phase to maintain the represented time frame would need to be higher, or that the excavation phase would require a longer time frame. Alternatively, if the haul trucks were to be loaded beyond the weight capacity identified in the revised 2022 DEIS, it would suggest that the noise and vibration impacts of the excavation phase would be greater than what was analyzed in the revised 2022 DEIS and greater than what the FEIS identified as an unmitigated significant adverse impact. If it is determined that the Amended Revised Site Plan has been reduced enough to move forward with the revised plans, the flawed and incomplete analysis identified in the FEIS will need to be addressed. The Lead Agency would then initiate the process for a Supplemental Environmental Impact Statement (SEIS) pursuant to the New York State Environmental Quality Review Act. If, in the Planning Board's opinion as Lead Agency, the Proposed Action has not been reduced enough to advance the Amended Revised Site Plan, the Planning Board is in a position to prepare the SEQRA Findings based on the record that has been presented in the DEIS and FEIS and the revised EAF and current application materials.

Please let us know if you have any further questions or would like to discuss this memorandum in more detail.

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