

CHAZEN ENGINEERING & LAND SURVEYING CO., P.C.

Dutchess County Office
Phone: (845) 454-3980

New England Office
Phone: (781) 556-1037

110 Glen Street, Glens Falls, New York 12801
Phone: (518) 812-0513 Fax: (518) 812-2205
Email: glensfalls@chazencompanies.com

Orange County Office
Phone: (845) 567-1133

Capital District Office
Phone: (518) 235-8050

58-43

February 21, 2003

Re: Seneca County Public Safety Building and Jail

Transmittal of FEIS

See attached Mailing List

→ Final Environmental Impact Statement

Dear Involved Agency or Interested Party:

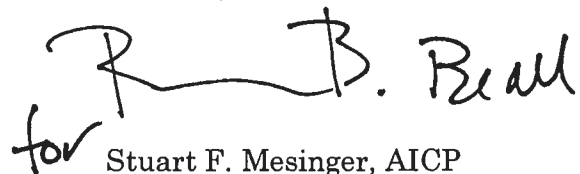
In accordance with Article 8 of the Environmental Conservation Law, on February 11, 2002, the Seneca County Board of Supervisors, as Lead Agency, accepted as complete a Final Environmental Impact Statement (FEIS) for the proposed Seneca County Public Safety Building and Jail at the Seneca Army Depot Site. This is a Type 1 Action. The FEIS, along with the Draft Environmental Impact Statement (DEIS) and Supplemental Environmental Impact Statement (SDEIS) for the project, together form the Environmental Impact Statement for the project.

The County proposes to locate the project at a location directly west of the intersection of Bromka Road and Route 96, at the Seneca Army Depot site within the Town of Romulus, Seneca County, New York. This site was reviewed in a SDEIS. An earlier proposal, reviewed in the DEIS, would have located the project on Kingdom Road in the Town of Seneca Falls.

Since the FEIS discusses both sites, it is being mailed to the involved and interested parties that received copies of both the DEIS and SDEIS.

Enclosed for your review is a copy of the FEIS. The Lead Agency Contact is Mr. Keith Ashby, Seneca County Manager, Seneca County Offices, 1 DiPronio Drive, Waterloo, NY 13165. Mr. Ashby's phone number is (315) 539-1705, and fax number is (315) 539-0207.

Sincerely,


for

Stuart F. Mesinger, AICP
Director, Glens Falls Office

Distribution List Involved Agencies For Current Proposal

NYS Commission of Corrections, 4 Tower Place, Albany, New York 12203

New York State Department of Environmental Conservation, Region 8
6274 East Avon-Lima Road
Avon, NY 14414

New York State Department of Health, 31 Thurber Drive, Waterloo, NY 13165

Mr. Raymond Zajac, Supervisor, Town of Romulus Town Hall, 1435 Prospect Street, Willard, NY 14588

Mr. William Egloff, NYSDOT Region 3, 333 East Washington Street, Syracuse, NY 13202

Distribution List – Interested Parties

New York State Department of Environmental Conservation, 625 Broadway, Albany, New York 12233-4757

Dr. Robert Kuhn, Historic Preservation Officer
Office of Parks, Recreation and Historic Preservation
Pebbles Island, P.O. Box 189
Waterford, NY 12188-0189

US Army Corps of Engineers
Buffalo District Regulatory Branch
1776 Niagara Street
Buffalo, NY 14207-3199

Mr. Steve Absolom
Seneca Army Depot
Route 96
Romulus, NY 14541-5001

Lead Agency

6 copies – to be distributed to County Manager, County Attorney, Chair Jail Committee, Ovid Public Library, Waterloo Public Library and Mynderse Library in Seneca Falls

Involved Agencies only due to earlier DEIS proposal for Kingdom Road Sites

Mr. Jeff Warwick, Water and Sewer District Superintendent
Village of Seneca Falls Water and Sewer District
60 State Street
Seneca Falls, NY 13148

John Yells, Water District Superintendent
Town of Fayette Water District
4151 Sunrise Cove
Seneca Falls, NY 13148

Mr. Pete W. Same, Supervisor, Town of Seneca Falls
10 Fall Street
Seneca Falls, NY 13148

Seneca County Agricultural Enhancement Board
c/o Mike Burkal, Agricultural Extension Agent
Seneca County Cooperative Extension
P.O. Box 748, Waterloo NY 13165-0748

Final Environmental Impact Statement
Seneca County Public Safety Building

Location: Seneca Army Depot at Bromka Road and NYS Route 96
Town of Romulus, Seneca County, New York

Lead Agency: Seneca County Board of Supervisors
Seneca County Offices
1 DiPrionio Drive
Waterloo, New York 13165

Lead Agency Contact: Keith Ashby, Manager Seneca County
c/o Seneca County Board of Supervisors
(315) 539-1705

Project Sponsor: Seneca County Board of Supervisors

SDEIS Prepared By: The Chazen Companies North Country Office
110 Glen Street
Glens Falls, New York 12801

Contact: Barbara B. Beall, Senior Environmental Scientist
Stuart F. Mesinger, AICP
(518) 812-0513

DEIS Accepted: December 11, 2001

DEIS Comments Due: February 1, 2002

DEIS Public Hearing: January 22, 2002

SDEIS Accepted: June 12, 2002

SDEIS Comments Due: July 17, 2002

FEIS Accepted: February 11, 2003

Consultants: The Chazen Companies North Country Office
110 Glen Street
Glen Falls, NY 12804
Draft Environmental Impact Statement
Contact: Barbara B. Beall, Senior Environmental Scientist
Stuart F. Mesinger, AICP
(518) 812-0513

Greenhouse Consultants
40 Exchange Place, 13th Floor
New York, NY 10005
Archeological Investigation
Contact: Barry Greenhouse
Will Roberts
(212) 514-9520

Stephen R. Ferranti, P.E.
SRF and Associates
3495 Winton Place
Building E, Suite 110
Rochester, New York 14623
Traffic Study
Contact: Stephen R. Ferranti, P.E.,
Rick DeCesare
(716) 272-4660

EXECUTIVE SUMMARY

This document is a Final Environmental Impact Statement (FEIS) for the construction of the Seneca County Public Safety Building. This document, along with the Supplemental Draft Environmental Impact Statement (SDEIS) and Draft Environmental Impact Statements (DEIS), together form the Environmental Impact Statement (EIS) for this project, prepared under the New York State Environmental Conservation Law, State Environmental Quality Review Act (SEQRA) Article 8 and implementing regulations at 6 NYCRR Part 617.

The EIS presents an evaluation of the potentially significant adverse impacts of locating the Seneca County Public Safety Building and Jail at the Seneca Army Depot in accordance with the detailed requirements and mandates of the SEQRA Regulations at 6 NYCRR Section 617.9(b). In addition, the EIS evaluates the potentially significant adverse impacts of locating the Seneca County Public Safety Building and Jail at an alternative site, specifically the Kingdom Road sites, located in the Town of Seneca Falls, Seneca County, New York.

1. Proposed Project

The purpose of this EIS is to analyze the potential impacts associated with the construction of the Seneca County Public Safety Building by the Seneca County Board of Supervisors. Through the SEQRA process, three sites have been reviewed. The original DEIS examined locating the Public Safety Building on one of two potential parcels located on the northeast corner of the intersection of Kingdom Road and County House Road. The SDEIS reviewed locating the Public Safety Building on a portion of the Seneca Army Depot property in the Town of Romulus, Seneca County, New York. As a result of the SEQRA review process, the Seneca County Board of Supervisors has determined that 128 beds is the appropriate size for this jail facility.

Seneca Army Depot Site: The site is immediately west of Bromka Road. The Five Points State Correctional Facility is located to the south of the potential jail location. As a result of the SEQRA review process, the Seneca County Board of Supervisors has now identified 128 beds as being the appropriate size for this jail facility. The facility at the Seneca Army Depot Site would not contain the Department of Probation Offices and would locate a portion of the Sheriff's office, and the outbuilding to a different existing building at the Army Depot Site.

The proposed Seneca County Public Safety Building would be 86,500 gross square feet, utilizing approximately 12 acres for the building, additional housing, parking, miscellaneous roads, access, lawn areas around buildings and parking areas, utilities, and stormwater management. The proposed project would result in the

excavation and grading of approximately 12 acres of land for the new facility, of which approximately 6.7 acres will be impervious surfaces. The access for the Seneca Army Depot Site would be via a single driveway, which would cross the East Patrol Road and connect into NYS Route 96 north of Bromka Road. This is the northern driveway identified in the SDEIS. The southern driveway has been abandoned in accordance with comments received from the NYSDOT. See Section 3.4, "Traffic," of this FEIS.

In addition, the plans for the Seneca Army Depot Site have identified a potential location for an expansion housing pod for the jail and a potential location for a future court facility. The locations for the footprints of both of these facilities have been evaluated under SEQRA to assure that there are no adverse environmental impacts associated with their construction.

The Seneca Army Depot site is provided with water service from Seneca County Water District #1. A pump station supplies water to a 1,000,000 gallon below ground reservoir located on the north side of the warehouse area, approximately one-mile north of the proposed jail facility. From this location, the water is pumped to a 750,000 gallon above ground reservoir located just south of the location being reviewed for the Seneca County Public Safety Building. Firefighting pressure studies have been conducted on the site for the warehouses and off-site at the hamlet of Romulus. These tests determined that there is adequate pressure and capacity on-site to serve the domestic water supply and fire fighting needs for the proposed facility.

The Seneca Army Depot is located within the Seneca County Sewer District #2, and is served by that County sewer district. A new sewage treatment plant was recently constructed within three miles of the site to service the Five Points Correctional Facility. This facility has adequate capacity to meet the needs of the proposed project. Electrical service (3-phased) is available on the Seneca Army Depot site (4800 volts – 3-phased), or could be extended to the site from off-site. The Five Points State Correctional Facility extended a 12.5 kV line to that site, with an on-site transformer on-site to step the power down for use in the Correctional Facility. Natural gas is being extended to the site NYSEG and will be available within the next six months.¹

The proposed project is not within an agricultural district.

¹ According to Pat Jones, Project Coordinator for Reuse for the IDA, Seneca County has been working with both the Army and NYSEG on the natural gas issue. The pipe is already at the depot awaiting installation. The IDA has been negotiating the gas easement with Army and NYSEG. The easement document is close to completion and the easement should be finalized within the next 30 days. As soon as the easement is finalized, it will be passed it on to NYSEG, at which point they can begin installing pipe into the ground. E-mail from Pat Jones dated May 31, 2002.

The Commission of Corrections has reviewed the Seneca Army Depot Site and on April 18, 2002 verbally approved this site for the location of the Seneca County Public Safety Building. A letter is expected shortly. The Commission of Corrections previously reviewed both of the Kingdom Road sites and by letter dated December 19, 2000, indicated that it believes both sites are suitable for the location a new county jail.

A Stormwater Management Plan has not been prepared for this site and will not be prepared until construction level drawings are developed. Because of its large size, flat nature, and ample available space, it is presumed that there is adequate area available on the Seneca Army Depot site to maintain existing flows from the site, control increases in stormwater conditions from the development conditions, mitigate potential stormwater quality impacts and control soil erosion and sedimentation from stormwater runoff. The Stormwater Management Plan will be prepared in accordance with the NYSDEC's Stormwater Management Design Manual dated October 2001. The NYSDEC standards require that any stormwater management facilities be analyzed for the two, 10, 25, 50 and 100-year storm events with insignificant increases in peak flows or peak volumes during those storms in the post-development condition as compared to the pre-development condition. In addition, the Stormwater Management Plan will describe the erosion and sediment control measures and the system management guidelines for the stormwater facilities.

Kingdom Road Sites: In the DEIS, the Seneca County Board of Supervisors reviewed the proposed construction of the Seneca County Public Safety Building on one of two potential parcels, both of which are located at the northeast corner of the intersection of Kingdom Road and County House Road. The southern-most parcel (Site A) is 25.4 acres in size, and is identified on the Town of Seneca Falls Tax Map as Section 35, Block 1, Lot 09. It is owned by Seneca County, and is currently a fallow field that is mowed regularly. The northernmost parcel (Site B) is attached to an 85.21 acre parcel that is located on both the east and west sides of Kingdom Road. The portion of that property that is being considered as Site B is located on the eastern side of Kingdom Road, to the north of Site A, and is approximately 24.4 acres in size. It is part of the parcel identified as Section 35, Block 1, Lot 09. This parcel is owned by Michael Bradley. It is an actively farmed parcel, currently planted in corn.

The site would house the Seneca County Jail, as well as a Sheriff's Office, E911 Dispatch Center and Department of Probation Offices. The DEIS reviewed a 60,970 gross square footage building (35,944 net square footage building), containing a 128 secure bed facility, along with the other offices listed above. Based on a conceptual layout, a facility of this size is anticipated to utilize approximately 12 acres for the building, additional housing, parking, miscellaneous roads, access, lawn areas around buildings and parking areas, utilities, and stormwater management. The

proposed project would result in the excavation and grading of 12 acres of currently undeveloped land for the new facility, of which 6.7 acres will be impervious surfaces.

Access to the proposed site will be from entrance drives to the east off of Kingdom Road. Water service can be extended either from the Village of Seneca Falls Water District or the Town of Fayette Water District. Sewer service can be extended from the Village of Seneca Falls Sewer District. Electrical service (3-phased) can be extended from the intersection of Route 414 and County House Road. Natural gas is available at the intersection of Kingdom and County House Roads. A Site Evaluation Report contained within the DEIS identified the locations, feasibility and cost of utility extensions (water, sewer, electric, and gas) for the two sites, the layout of the facilities on the two sites, the existing conditions including soils and test pits, traffic, parking and distance to the court, topography, drainage, stormwater, and wetlands, and radio communications.

The project was located within an Agricultural District, and a Notice of Intent to Undertake an Action within an Agricultural District was prepared and included in the DEIS.

The Commission of Corrections reviewed both sites, and by letter dated December 19, 2000, indicated that it believes both sites are suitable for the location a new county jail.

A preliminary Stormwater Management Plan was prepared for this facility. The purpose of the Stormwater Management Plan is to maintain existing drainage patterns to the maximum extent practical while continuing the conveyance of upland watershed runoff; controlling increases in stormwater runoff resulting from the proposed and future development conditions without adversely impacting downstream conditions; and mitigating potential stormwater quality impacts and preventing soil erosion and sedimentation resulting from stormwater runoff. The Stormwater Management Plan was prepared in accordance with the NYSDEC's Memorandum from the Division of Water regarding Technical Operational Guidance Series 5.1.8, Stormwater Management Guidelines for New Development. Two detention pond have been designed for either Site A or Site B to control the increase in proposed flow condition for the two, 10, 25, 50 and 100-year storm events after development with insignificant increases in peak flows or peak volumes during those storms. In addition, the Stormwater Management Plan describes the erosion and sediment control measures and the system management guidelines for the stormwater facilities.

2. SEQRA Process

A DEIS was previously prepared for locating the Seneca County Public Safety Building on one of two sites on Kingdom Road. That DEIS was prepared in accordance with the "Scoping Document" adopted by the SEQR Lead Agency, the Seneca County Board of Supervisors, pursuant to the SEQRA regulations at 6 NYCRR Section 617.9. By resolution dated September 11, 2001, the Seneca County Board of Supervisors indicated their intent to be Lead Agency for the project, and on September 17, 2001 subsequently circulated Lead Agency Coordination letters. There were no objections raised to the Seneca County Board of Supervisors being Lead Agency on the project. On October 23, 2001, the Seneca County Board of Supervisors voted to become Lead Agency. On that date, it also determined that the project had the potential for significant environmental impacts and issued a Positive Declaration pursuant to 6 NYCRR 617.7(c). Scoping was conducted from October 23, 2001 to November 15, 2001 and a public scoping session was conducted on November 8, 2001. On November 27, 2001 the Board of Supervisors adopted the Scoping Document setting forth the issues to be addressed in the DEIS. On December 11, 2001, the Seneca County Board of Supervisors determined that the DEIS prepared for the Kingdom Road sites was complete for public review and comment. The public notice comment period on the DEIS was open from December 11, 2001 until February 1, 2002 with a public hearing held on January 22, 2002.

On April 11, 2002, the Seneca County Board of Supervisors authorized the preparation of a Supplemental EIS (SDEIS) to review the potential impacts at an alternate site to the Kingdom Road location(s). On April 23, 2002, the Seneca County Board of Supervisors determined that the SDEIS would focus on a site at the Seneca Army Depot.

On June 12, 2002 the SDEIS was accepted as complete for public comment. The public comment period began on June 17, 2002 and continued to July 17, 2002. One comment letter was received from the NYSDEC dated July 10, 2002 indicating that the DEIS was adequate for the agency to prepare any findings that might be needed related to Department Approvals. In addition, on June 10, 2002 the US Army Corps of Engineers commented on a jurisdictional determination submitted on the project site and indicated agreement that the site did not contain any federal regulated wetlands, but that Hicks Gully, which is a tributary to Seneca Lake, would be a regulated water of the United States.

On September 19, 2002, a letter was sent to NYSDOT, Region 3 Staff to also review the DEIS. It had become apparent during the due diligence review for permit requirements that a State Highway Work Permit would be required from the NYSDOT due to the access road onto NYS Route 96. A SDEIS was submitted to NYSDOT Region 3 staff for review. By letter dated October 9, 2002 the NYSDOT indicated general agreement with the Traffic Study for the project, but could not

identify a documented need to justify two driveways on the site. In addition, they requested that the Stormwater Management Plan be completed in conformance with Department Guidelines and be given to them for review as part of the State Highway Work Permit Application.

3. Need for Project

The pre-architectural program for the Seneca County Jail, developed by Liebert & Associates², summarizes the need for a new facility. This report is summarized in the original DEIS for the proposed project. The existing Seneca County Jail was constructed in 1913. The original facility included the Sheriff's living quarters and kitchen on the first floor and inmate housing on the second floor. It presently has a capacity of approximately 46 inmates. The average daily population in 2000 was 60. In 1999, Seneca County began boarding inmates in other county jails. This has become expensive, costing in excess of \$500,000 per year.

The existing physical plant does not comply with the New York Jail Standards Board Minimum Standards for Detention and Holding Facilities or American Jail Association Standards for Adult Local Detention Facilities. The current jail is overcrowded, and the existing facilities do not allow for the proper classification, separation, or supervision of the inmates.

In 1999, the Seneca County Supervisors began the planning process for a new jail by contacting the National Institute of Corrections Jail's Division for Technical Assistance, to initiate a Planning of New Institutions (PONI) Phase 1 Assessment. This was completed in 2000. The county then participated in the PONI Phase II program and Jail Design Review Program in Longmont Colorado. These events occurred in late 2000-2001. In December 2000, the Seneca County Board of Supervisors retained the criminal justice planning firm of David M. Bennett of Park City, Utah to complete a Needs Assessment Study. The criminal justice planning firm of Liebert & Associates was retained in March of 2001 to develop a Pre-Architectural Program for a New Jail and Sheriff's Office based on the Needs Assessment Study.

In April 2001, Volume 1 of the Seneca County Corrections Master Plan was presented. The Needs Assessment collected historic and recent data to examine the operation of the criminal justice system and to understand the factors that have been driving the jail population. Based on the analysis of the data, program and policy evaluation, and an evaluation of alternative programs, inmate population forecasts were made outlining the number and types of bed spaces needed in Seneca County for the next 20 years. The participants of the criminal justice symposium recommended to the Board of Supervisors, based on criminal justice policy decisions, that a 125-150 bed jail with the availability for expansion through the construction of an additional housing pod, be constructed to meet the future jail bed space needs of Seneca County. The Seneca County Board of Supervisors decided to

² Liebert & Associates. 2001. "Pre-Architectural Program for the New County Jail, Sheriff's Office, E911 Dispatch Center and Department of Probation and Community Corrections." Boulder, CO.

authorize Liebert & Associates to proceed with planning a jail with an initial capacity of 128 beds.

4. Alternatives Analysis

The search for an alternative to resolve the overcrowding problems at the existing Seneca County jail has been the driving force behind the course of action in this proposed project. The alternatives analysis reviewed in this SEQRA process, have included the "No-Action Alternative," (including the continued boarding out of inmates); expanding the existing jail site in the Village of Waterloo; the alternative site selection process, and various utility line routing alternatives for the Kingdom Road Sites.

No Action Alternative: Seneca County is required by New York State law to operate a County Jail. The existing jail, at 46 beds, is too small to house the current inmate population of Seneca County. The average daily population of inmates was 60 in the year 2000. In 1999, Seneca County began boarding inmates in other county jails. This has become expensive, costing in excess of \$500,000 per year. The existing jail is not in compliance with the New York State Building Code, the Office of Court Administration Regulations and other industry codes and standards. It is estimated to cost \$792,400 to remedy these issues at the jail, which would still not address the overcrowding issue. The No-Action Alternative would cause continued hardship for the County, and for these reasons, is not feasible.

Expansion at Existing Jail Site in Village of Waterloo: Reports were prepared³ that exemplified the possible renovation and expansion of the existing Seneca County Jail/Sheriff's Department, and compared that to a new facility at a new site. The fact that the existing jail facility and Sheriff's Office is a multi-story facility, and an existing facility would cause significant problems in the renovation, expansion and future operation of the facility. In general, all the information contained in the report favored new construction over renovation. Therefore the County rejected this alternative.

Alternative Site Selection Process: The Seneca County Public Safety Committee examined 18 sites throughout Seneca County. Criteria used by the Committee in this evaluation included topography/size, drainage, location, economic impacts, adjacent land uses, utilities and approval of the New York State Commission of Corrections. During this Alternatives Analysis, after significant consideration and deliberation, the Seneca Army Depot site was originally rejected due to its distance

³ Kimball, L. Robert & Associates Architects and Engineers, Inc. 1992. "Condition Survey Report for the Existing Building Complex including Courthouse, Sheriff's Department and Jail Building." Syracuse, NY, and Kimball, L. Robert & Associates Architects and Engineers, Inc. Undated. "Study of Architectural Options for Seneca County Jail/Sheriff's Department". Syracuse, NY.

to the County Offices and Courthouse in the Village of Waterloo (12 miles distant)⁴. As a result, the DEIS for the project reviewed the two Kingdom Road sites. However, after the public comment period concluded for the Kingdom Road Sites DEIS, the Seneca County Board of Supervisors decided to revisit and reevaluate the Seneca Army Depot site for a number of reasons.

- Significant public opposition surfaced with regard to the Kingdom Road site, with 10 pages of signatures on a petition opposing the Kingdom Road site submitted to the Board of Supervisors during the SEQRA comment period.
- Utility costs were not included in the preliminary cost analysis for the Kingdom Road site, and these utility costs are more expensive than the Seneca Army Depot site.
- The land use and community character impacts associated with locating the Public Safety Building at the Depot are ameliorated by the fact that there is an existing State Correctional Facility, the Five Points Correctional Facility, at the Depot facility to the south of the site proposed for the county facility.
- Transportation costs were not evaluated equally across all of the alternative sites. Upon further review, the Sheriff decided it would be possible to use uniformed officers to transport inmates rather than transportation officers, which would reduce the transportation costs that had previously been anticipated for the Seneca Army Depot Site.
- The use of existing facilities at the Seneca Army Depot site for the Sheriff's facilities reduces total project costs at the Public Safety Building by \$1.6 million compared to the Kingdom Road site. The construction cost reduction was about \$1 million dollars, with \$600,000 in bond savings.
- While the exact amount is not known, New York State has indicated that they could provide state funding to renovate buildings at the Seneca Army Depot site. This funding is pending approval.

Collectively, the costs at the Seneca Army Depot site, especially compared to the more detailed utility cost estimates developed for the Kingdom Road DEIS, were less than expected, and, given the public comments on the Kingdom Road Site, the Seneca County Board of Supervisors decided to reevaluate the Seneca Army Depot site through the SEQRA SDEIS.

⁴ Chazen Companies. 2001. "DEIS, Seneca County Public Safety and Jail, Town of Seneca Falls, Seneca County, New York. Appendix C, Alternative Sites Report." Glens Falls, New York. Page 4.

5. Status of Permits and Approvals

Seneca Army Depot Site: A number of agencies have regulatory review over the proposed project to be located at the Seneca Army Depot Site.

- The Seneca County Board of Supervisors will need to approve funding of the Action, and approve the location and size of jail facility. This can only be done after SEQRA is complete.
- The NYS Commission of Corrections/NYS Department of Correctional Services approves location of all jail facilities, and will approve contract documents prior to construction to assure compliance with applicable regulations, mandates and design guidelines. The NYS Commission of Corrections has approved both of the Kingdom Road sites and the Seneca Army Depot site for the location of the Seneca County Public Safety Building. The NYS Commission of Corrections will approve all contract documents prior to construction.
- The Seneca County Board of Supervisors, through the County Office of Economic Development personnel, has been coordinating with the Army Depot Activity Caretaker Force to coordinate the transfer of land from the Seneca Army Depot to Seneca County. A 25-acre plat has been identified for transfer associated with the construction of the Seneca County Public Safety Buildings.
- The New York State Department of Environmental Conservation, Region 8 would review any Notice of Intent for SPDES General Permit for Stormwater Construction Discharges, and would review any Section 401 Water Quality Certificate for any federal wetland permits, should they be needed. By letter dated July 10, 2002, the NYSDEC Region 8 commented that the DEIS was adequate for the Department to prepare any necessary findings, and that the NYSDEC Division of Environmental Remediation was working with the US Environmental Protection Agency so that any site contamination matters will be resolved to allow for the planned new use of this parcel of land.
- A State Highway Work Permit will be required from the NYSDOT due to the access road onto NYS Route 96. A State Highway Work Permit application will need to be submitted to the NYSDOT after SEQRA is completed for review and comment. The State Highway Work Permit will need to attach a Stormwater Management Plan (Drainage Plan) completed in conformance with Department Guidelines.
- The New York State Department of Health will approve on-site potable water supplies and kitchen designs. This will occur as part of the construction drawing review.

- A copy of the SDEIS was submitted for the Historic Preservation Officer, Office of Parks, Recreation and Historic Preservation. The SHPO had already signed off on the Seneca Army Depot Site, but a copy of the SDEIS was sent to the SHPO for consistency purposes. No comments were received from SHPO on the proposed project.
- Authorization would only be required from the US Army Corps of Engineers if the project proposed a stream crossing over Hicks Gully to access NYS Route 96. At this time, no such crossing is proposed, and thus, no permits are required from the US Army Corps of Engineers.

Kingdom Road Site: The approvals required at the Kingdom Road sites are similar to the Seneca Army Depot Site, except where noted below.

- Seneca County Board of Supervisors. Same reviews as above.
- NYS Commission of Corrections/NYS Department of Correctional Services. Same reviews as above.
- New York State Department of Environmental Conservation, Region 8. Along with the reviews listed above for the Seneca Army Depot Site, the project at the Kingdom Road Site would require approvals for extensions of any sewer districts. In addition, there is a much higher likelihood of ACOE wetland regulatory involvement, and thus the need for a Section 401 Water Quality Certificate from the NYSDEC.
- New York State Department of Health. Along with the approvals listed above for the Seneca Army Depot Site, the project would require the approval for the extension of water districts by the NYS Department of Health.
- The proposed project would require the approval of any connection to municipal sewer districts or water supply systems from the Water and Sewer District Superintendents for Village of Seneca Falls Water and Sewer District/Town of Fayette Water District.
- Because the Kingdom Road Site is located within an Agricultural District, it would require the review of the Commissioner of Agriculture and Markets and the Seneca County Agricultural Enhancement Board pursuant to New York State Agricultural and Markets Law Section 305(4).
- The Historic Preservation Officer, Office of Parks, Recreation and Historic Preservation would need to review Significant Cultural Resources under New York State Historic Preservation Act of 1980, Section 14.09. A Stage 1B

investigation of the selected site and the waterline and sewer line ROW would need to be conducted for SHPO review.

- It is also likely that authorization will be required from the US Army Corps of Engineers for stream crossings associated with utility line construction to connect this site to other sites. The US Army Corps of Engineers is a federal regulatory agency, and will review this project under the National Environmental Policy Act (NEPA).

6. Existing Conditions

Seneca Army Depot Site: The preferred alternative site is a 25-acre portion of the Seneca Army Depot site that was previously used as a dry materials tank storage farm. The site now consists of old field shrub upland vegetation crossed by numerous roads and ditches. This site was reviewed in the SDEIS.

Kingdom Road Sites: Two sites were reviewed on Kingdom Road by the Seneca County Board of Supervisors in the DEIS for the Seneca County Public Safety Building. Both sites are located at the northeast corner of the intersection of Kingdom Road and County House Road. The southern-most parcel (Site A) is 25.4 acres in size. It is owned by Seneca County, and is currently a fallow field that is mowed regularly. The northernmost parcel (Site B) is a 24.4 acre portion of an 85.21 acre parcel that is located on both the east and west sides of Kingdom Road and immediately north of Site A. This parcel is owned by Michael Bradley, is actively farmed, and was planted in corn when the DEIS was prepared.

7. Significant Beneficial and Adverse Impacts

The EIS did not identify any environmental impacts that would be “significant” in the context of SEQRA.

8. Seneca Army Depot Site Environmental Impacts / Mitigation Measures

Soils, Geology and Topography: The proposed project will result in the excavation and grading of approximately 12 acres of land for the new facility, of which approximately 6.7 acres will be impervious surfaces. This is necessary to obtain suitable grades for the proposed building, roadways, and parking areas. The project requires construction of a stormwater management facility. The implementation of best management practices and soil erosion control plans will minimize the impacts associated with construction and operations by controlling stormwater runoff and stabilizing soils through the establishment of vegetative cover.

Contaminated Soils: The site was previously used as a dry storage tank farm, and three or four tanks still remain. The Seneca Army Depot staff has indicated that there are no foundations associated with the tanks, and that there are no piping systems underground. According to the Phase 1A Environmental Site Assessment (ESA), environmental investigations performed by the US Army have confirmed that shallow soil in the former tank farm has been adversely affected by SVOCs, heavy metals and asbestos. In addition, SVOCs, pesticides and PCBs have been identified in sediment located in the drainage ditches in the tank farm. No evidence of groundwater impacts was identified on the tank farm. The identification of soil and sediment contamination on the subject site and adjoining portions of the former tank farm is considered to be a “recognized environmental condition” as defined under ASTM E 1527-00. Based on the analytical data, a targeted soil removal plan has been developed by the US Army. The remediation plan includes the removal of surface soil (to a depth of six inches) from five locations within the tank farm where elevated metal and SVOC concentrations have been identified. Additionally, remediation is proposed within two lengths of the drainage ditch that surrounds the tank farm. The proposed remediation in these areas will include the excavation and removal of impacted soil/sediment in these locations. Confirmational sampling and analysis will be conducted after the removal of the identified soil to confirm that these areas have been successfully remediated through removal of impacted soil. Following the soil removal, the excavations will be backfilled with clean soil and regraded. Based on the available data, the soil/sediment excavation proposed by the US Army, and coordinated through the USEPA and NYSDEC, is anticipated to result in the successful remediation of the subject site. No additional “recognized environmental conditions: were identified for the subject site.

Data maintained by New York State and the USEPA indicate that there is a moderate potential for indoor air radon concentrations to exceed the USEPA’s target residential concentration of 4.0 pCi/L for properties located in the Town of Romulus and in Seneca County. The potential presence of elevated indoor air radon concentrations is not an ASTM “recognized environmental condition,” however it may limit future uses of the site property with respect residential structures. A radon survey was not performed as a function of the Phase 1 ESA.

Groundwater and Surface Water Resources: The proposed project will have no impact on groundwater. Groundwater will not be used to supply potable water to the jail. There is no on-site sewage disposal, and the jail is designed to avoid any adverse impacts to groundwater. With regard to impacts on drainage flows or patterns or surface water runoff, best management practices can be used to minimize these impacts during construction and operation. The proposed project will alter the drainage of the site due to regrading necessary for the proposed facility, and will create additional impervious surface areas compared to existing conditions. As mitigation, the Stormwater Management Plan will be prepared in accordance with the NYSDEC’s Stormwater Management Design Manual dated

October 2001. In addition, any drainage directed towards NYS Route 96 will be designed in accordance with the NYSDOT Standards.

Wildlife and Cover Types: There are no federally or state listed threatened or endangered species, nor is there any critical habitat on the project site. The proposed project will replace a portion of old field habitat with buildings, parking and lawn areas. The proposed project will reduce habitat values for some common species that use the site. The project, as designed, will have no impacts on waters or wetlands of the United States. If the access road to NYS Route 96 requires a crossing of "Hicks Gully," a water of the United State, there is a Nationwide Permit 14 available to authorize this impact under the Clean Water Act.

Transportation: The proposed project has the potential to generate higher levels of traffic than existing uses on or surrounding the site. A traffic impact study was conducted for the proposed project. This study found that the existing transportation network can accommodate the projected traffic volumes, and will not adversely impact traffic on the adjacent roadways. In addition, no modifications to study area intersections are warranted or recommended as a result of the proposed development. The proposed access drive onto NYS Route 96 will be designed to all relevant NYSDOT standards, and consists of a single lane entering and exiting. To accommodate busses and maintenance vehicles, a WB 40 or 50 design vehicle will be used for all appropriate curb radii, to provide safe ingress and egress within the site and onto NYS Route 96. The proposed position of the access drive affords adequate sight distance (left and right) along NYS Route 96, to provide safe ingress and egress. It is imperative that the final position of plantings, signs and miscellaneous site amenities are not placed at locations that would prohibit or limit the required sight distances from the access drives.

The development of a court on the site would have the potential to reduce the non-significant traffic impacts, because such a facility would result in a single magistrate entering the facility to conduct court business, rather than having multiple transports of inmates to the courts to conduct business.

Air Quality: The proposed project may temporarily generate dust during construction, which can be controlled through the implementation of best management practices. The proposed project will result in an insignificant increase in motor vehicle emissions.

Visual Resources: The proposed project proposes to construct a jail facility in an old-field area, which is surrounded by warehouse facilities to the north and a state correctional facility to the south. There is some visual screening to the north and south of the site in the form of wooded habitats. There would be minimal screening from direct views into the site from NYS Route 96. The building will be designed so

that it has the appearance of a public building. Vegetative screening and landscaping will be used to buffer the views of the facility from the road.

The Montgomery County Jail was used as the model for which was used for developing the "Proposed Conditions" visual assessment was the Montgomery County Jail, which did not include a court facility. Therefore, the development of a court facility on this site may increase slightly the length of the building visible from NYS Route 96 or Routes 414. The expansion of housing on the site should not be visible from either road because such expansion would occur at the rear, or western side of the facility.

Nighttime lighting will be minimized through the use of shoebox style fixtures that focuses lighting on the building and parking lots, minimizing lighting spillover either off the site or upward into the nighttime sky.

Historic and Archeological Resources: It is the understanding of the Caretaker of the Seneca Army Depot that the State Historic Preservation Officer (SHPO) also cleared the dry storage tank farm area proposed for the Seneca County Jail from further review due to the level of previous disturbance at the site. In order to confirm this understanding, a letter dated May 9, 2002 was submitted to Dr. Kuhn at the SHPO. By letter dated May 21, 2002, the SHPO determined that the project will have "No Effect" upon cultural resources in or eligible for inclusion in the National Register of Historic Places. The SDEIS was provided to Dr. Kuhn for coordination under SEQRA.

Land Use, Community Character and Zoning: Surrounding land uses are the remainder of the Seneca Army Depot site, which contains conservation and recreational land uses in the center and western portion of the site, a Planned Industrial Development on the farm north of the site along NYS Route 96, housing to the north of the site, warehousing immediately north of the site, and the state correctional facility to the south of the site. Land uses on the east side of Route 96 include some homes, agricultural lands, and woodlands. Romulus Central School and the hamlet of Romulus are approximately 1.7 miles to the north on Route 96. The Town of Romulus, in which the site is located, currently does not having zoning, but is in the process of adopting zoning. The proposed zoning map for the Town indicates that the portion of the Seneca Army Depot site where the proposed project is to be located would be zoned I/W – Industrial/Warehousing, while the area to the south of the site would be zoned I/G – Institutional/Governmental. According to the November 7, 2001 draft of the Zoning Code, Article IV, correctional facilities would not be a "Not Allowed/Prohibited Use" in the Industrial/Warehousing Zone and a "Zoning Permit Required" use within the area zoned Institutional/Governmental.

On May 9, 2002, the Seneca County Planning Board reviewed the Zoning Ordinance as part of the General Municipal Law Section 239-m review process. The Planning

Board recommended to the Town of Romulus that a category be added to the Use Charts, which would list County Offices and Facilities as being an allowed use within the Warehouse Zone. In addition, the Planning Board recommended to the Town of Romulus that the definition of Reuse Plan in Article II be revised to read "The plan, for the lands now or formerly part of the Seneca Army Depot, located within the municipal boundaries of the Town of Romulus, entitled Reuse Plan and Implementation Strategy for the Seneca Army Depot, which was first adopted on October 22, 1996, and as amended through the adoption date of this section," which will allow for changes in the reuse plan without requiring the need to change the zoning map. The Town of Romulus is working on including the changes recommended by the County Planning Board in the zoning code, making the proposed project compatible with the proposed zoning.

However, whether or not the Town adopts the proposed ordinances, with or without the changes proposed by the County Planning Board, the jail, as an essential governmental facility, is exempt from local zoning requirements.

Noise: There will be some generation of noise from the Public Safety Building. Studies done at an existing public safety building similar to the proposed project have identified the roof-mounted HVAC units as the main source of noise⁵. The NYS Department of Environmental Conservation, the US Department of Housing and Urban Development, and the Federal Highways Administration have all developed noise guidelines. In effect, these guidelines suggest that noise levels below 55 dBA are protective of public health and between 55 and 65 dBA are allowed in commercial or industrial zones. The proposed project will result in noise levels less than 55 dBA at all locations except one, which is located to the rear or west of the facility. That location (Location 6) would have a noise level of 56.7 dBA. The guidelines also suggest that an increase in noise of greater than 6 dBA should be examined. One location on the site (Location 1) will have an increase of 5 dBA, and Location 6 will have an increase of 15.2 dBA. Again, these locations are in the center or to the rear of the site away from project boundaries.

The closest residence is 4,200 feet from the jail, and the ambient noise at the residence is 25.0 dBA greater than the post-development noise levels.

For all locations along the property boundary with NYS Route 96 or outside of the proposed site, noise level will not increase subsequent to proposed construction.

The inmate noise is not expected to be a significant source of sound; irregular or loud "short term" noise is not expected due to the orderly nature of the proposed establishment; if needed, the baseline noise from the HVAC units can be moderated

⁵ Chazen Companies. 2001. "Draft Environmental Impact Statement, Seneca County Public Safety Building and Jail, Town of Seneca Falls, Seneca County, New York, Kingdom Road." Section 4.9, Noise. Glens Falls, New York. Pages 111.

or eliminated through design of the HVAC to reduce or screen noise; noise levels at locations 1 and 6 will increase subsequent to the proposed development.

Utility and Solid Waste Provisions: There is adequate water volume and pressure to meet the needs of the County Jail Facility at this site. The site is serviced by municipal sewer district, and there is adequate capacity to accept this waste. Electrical service (3-phased) is available on the site. Natural gas is being provided to the Seneca Army Depot Site within the next six months⁶. Seneca County has adequate capacity in its solid waste stream to dispose of the additional solid waste generated by the jail.

Agricultural Land Resources: The site is not located within an agricultural district.

Emergency Services: The proposed project will result in a reduction in emergency service calls due to upgrades in the fire system that will reduce the number of false fire alarms from the jail, and the presence of a full time and part time nurse on-staff, which will reduce the number of ambulance calls and hospital visits generated by the jail. However, the jail would be located in a different location, and handled by different emergency responders than the existing facility. Therefore, contacts were made with the Romulus Fire Department and the South Seneca Community Volunteer Ambulance Company. According to the Romulus Fire Department, there is adequate capacity at the fire department to meet the needs of the jail. According to the South Seneca Community Volunteer Ambulance Company, there is adequate capacity at the ambulance company to meet the needs of the jail.

Town Services and Fiscal Conditions: The proposed project will not cause significant impacts on town services. Because employees at the existing Seneca County Jail will relocate to this new facility, the proposed project will not result in a significant increased enrollment in local school districts. The Seneca Army Depot property is currently owned by the US Army. While the base was in operation, the US Army provided payments to the Romulus school district for students who's parents worked at the Seneca Army Depot. However, these payments have not been made since the base ceased operation. The portion of the Seneca Army Depot facility that is identified as warehousing is currently leased by the Seneca County Industrial Development Agency (IDA) with a sublease to the Advantage Group. The Advantage Group Property, which includes 42 buildings, are currently on the Town of Romulus Tax Roles, as of May 1, 2002. The project proposes to use one of the buildings, Building 103, for the Sheriff's Department. If the building continues to be owned by the Advantaged Group, then taxes will continue to be paid by the

⁶ According to Pat Jones, Project Coordinator for Reuse for the IDA, Seneca County has been working with both the Army and NYSEG on the natural gas issue. The pipe is already at the depot awaiting installation. The IDA has been negotiating the gas easement with Army and NYSEG. The easement document is close to completion and the easement should be finalized within the next 30 days. As soon as the easement is finalized, it will be passed it on to NYSEG, at which point they can begin installing pipe into the ground. E-mail from Pat Jones dated May 31, 2002.

Advantage Group to the Town of Romulus. If this single building is deeded to the County, then there would be a minor reduction in the amount of taxes paid by the Advantage Group to the Town of Romulus.

9. Kingdom Road Sites Environmental Impacts / Mitigation Measures

Soils, Geology and Topography: The proposed project will result in the excavation and grading of 12 acres of currently undeveloped land for the new facility, of which 6.7 acres will be impervious surfaces. This is necessary to obtain suitable grades for the proposed building, roadways, and parking areas. The project also requires the extension of sanitary sewer service, potable water supplies and other utilities. The project requires construction of a stormwater management facility. Portions of Site A, as it currently exists, contain areas of steep slopes and erodible soils (Schoharie silty clay loam 6-12% slopes (ShC3)). The construction of impervious surfaces has the potential to increase runoff, creating erosion problems, and siltation problems downstream in Sucker Brook. The implementation of best management practices and soil erosion control plans will minimize the impacts associated with construction and operations by avoiding areas of erodible soils, controlling stormwater runoff and stabilizing soils through the establishment of vegetative cover.

Groundwater and Surface Water Resources: The project will have no impact on groundwater. Groundwater will not be used to supply potable water to the jail. There is no on-site sewage disposal, and the jail is designed to avoid any adverse impacts to groundwater. With regard to impacts on drainage flows or patterns or surface water runoff, the jail has been designed to avoid these areas. Best management practices can be used to minimize these impacts during construction and operation. The project will alter the drainage of the site due to regrading necessary for the proposed subdivision, and will create additional impervious surface areas compared to existing conditions. As mitigation, a Stormwater Management Plan has been prepared. Given that the local municipality does not have its own stormwater regulations, the standards used to develop the plan were the NYSDEC Memorandum Technical and Operational Guidance Series 5.1.8, "Stormwater Management Guidelines for New Development". The stormwater management plan will provide for the control and detention of flows up to and including the 100-year 24-hour storm event. The project will result in no significant change to post-development flows and total runoff volumes as a result of the stormwater management plan.

Wildlife and Cover Types: There are no federally or state listed threatened or endangered species. There is no critical habitat on the site. The project will replace a portion of either a fallow open field or a row crop field with buildings, parking and

lawn areas. The project will reduce habitat values for some common species that use the site.

There are federally regulated wetlands identified on Site A. These wetlands are isolated, and therefore not jurisdictional, under the recent US Supreme Court decision in *Solid Waste Authority of Northern Cook County versus US Army Corps of Engineers*. The jail design would have minimal impacts on these wetlands. Even if the wetlands were jurisdictional, approximately 0.04 acre of wetland would be impacted, which is less than the 0.1 acre threshold for notification to the US Army Corps of Engineers for its nationwide permit program.

The construction of the water and sewer lines from the jail site to the tie-in with the Village of Seneca Falls water and sewer district mains on Route 414 would involve crossing Sucker Brook, a stream and wetland system. The extension of a water main to the Town of Fayette water district on Bauer Road would also require a stream crossing. Neither of these streams is protected by the NYSDEC, but both crossings would require the review of the US Army Corps of Engineers and a Section 401 Water Quality Certificate from the NYSDEC.

Transportation: The proposed project has the potential to generate higher levels of traffic than existing uses on or surrounding the site. These impacts can be mitigated through the use of traffic control devices.

Air Quality: The project may temporarily generate dust during construction, which can be controlled through the implementation of best management practices. The project will result in an insignificant increase in motor vehicle emissions.

Visual Resources: The project proposes to construct a jail facility in an agricultural area, which is a significantly different land use compared to surrounding land uses. The sites have minimal screening along the existing road edges. The building will be designed so that it blends with the adjacent agricultural buildings, and has the appearance of a public building. Vegetative screening and landscaping will be used to buffer the views of the facility from the road.

Nighttime lighting will be minimized through the use of shoebox style fixtures which focus lighting on the building and parking lots, minimizing lighting spillover either off the site or upward into the nighttime sky.

Historic and Archeological Resources: A Stage 1A study has been conducted for the project site. This study found that a Stage 1B Cultural Resource Investigation should be conducted for either site. This information will be developed and included in the FEIS.

Land Use, Community Character and Zoning: Surrounding land uses are residences, agricultural lands and wooded open space areas. The generally character of the surrounding area is agricultural. The site is zoned A-2 for 500 feet adjacent to either side of Kingdom Road, with the remainder of the site zoned A-1. Public buildings are a permitted use in the A-1 and A-2 zones. The project meets the Lot and Bulk Regulations for the A-1 and A-2 zones. The project also meets the parking requirements for the A-1 and A-2 zone. The project will be designed to minimize adverse impacts on land use associated with the perception of the facility as a jail. This will be done through the design of a building front that has the appearance of a public office complex with similar architectural features as the surrounding buildings.

Noise: There will be some generation of noise from the Public Safety Building. Studies done at existing public safety buildings have identified the roof-mounted HVAC units as the main source of noise. The Town of Seneca Falls has a Noise Performance Standard in its Zoning Code that does not allow a greater than six decibel noise increase for more than six minutes during any sixty hour period, presumably at the property boundary. The design of the HVAC systems on the roof will need to take this requirement into account.

Utility and Solid Waste Provisions: Water service can be extended either from the Village of Seneca Falls Water District or the Town of Fayette Water District. There is adequate volume in the Village of Seneca Falls system, although pressure will likely need to be boosted with pumps at the site for firefighting, as well as domestic supply. The Town of Fayette water service is marginal for the use by the jail. Use of the water service would require at a minimum, a booster pump for firefighting, and there may not be adequate volume of water for domestic use. Sewer service can be extended from the Village of Seneca Falls Sewer District, and there is adequate capacity in the system to accept the waste. Electrical service (3-phased) can be extended from the intersection of Route 414 and County House Road. Natural gas is available at the intersection of Kingdom and County House Roads. Seneca County has adequate capacity in its solid waste stream to dispose of the additional solid waste generated by the jail.

Agricultural Land Resources: Both Site A and Site B are located on lands within an Agricultural District. Site A is associated with the County Farm property, and all agricultural entities in the County are in agreement that this property could be taken out of the Agricultural District without harm to the agricultural activities in this district. The County Farm property is not under active cultivation, while Site B is under active cultivation. The landowner of Parcel B is also interested in being a willing seller for the jail and entering into a land swap with the County. Regardless of which site is chosen, the project will not result in a reduction of lands under active agricultural cultivation, but will result in an approximately 25 acre parcel being taken out of an agricultural district.

In addition, the project proposes to extend sewer and water service to the site from existing districts. Such an action may result in adverse impacts to agricultural soils, and additional development pressures on farmlands in the area. The A-1 and A-2 zoning in the area minimizes the development pressure. If it is consistent with good engineering and economic practices, the Agricultural Enhancement Board has suggested that 1) both the sewer and water be extended out of the Village of Seneca Falls in order to concentrate any pressures into one area; 2) that the sewer and water be provided to the jail site as an "out of district" extension along County House Road, but include area along Route 414 as an in-district extension; and 3) extend both the sewer and water along County House Road rather than across the fields directly from Site B to Peterman Road.

Town and Emergency Services: The project will not cause significant impacts on town services. Because employees at the existing Seneca County Jail will relocate to this new facility, the project will not result in a significant increased enrollment in local school districts. The project will result in a reduction in emergency services due to upgrades in the fire system that will reduce the number of false fire alarms from the jail, and the presence of a full time and part time nurse on-staff, which will reduce the number of ambulance calls and hospital visits generated by the jail.

Town Fiscal Conditions: Seneca County owns Site A, while Site B is owned by a private landowner, and is agricultural production. There will be no net change to fiscal conditions as a result of land use changes to site the jail. If Site A is chosen, it is already a site in public land ownership. If Site B is chosen, Site A will be placed into agricultural production.

10. Secondary and Growth Inducing Impacts

The employees at the proposed jail facility will generally be individuals who work at the existing jail at Waterloo and who will commute to the proposed location. The proposed minimum staffing at the jail will result in a net increase of 16 staff. Provided a County Jail expansion occurred in Seneca County, this increase in personnel would have occurred regardless of the location where the jail is constructed. It is likely that this jail has fewer staff than would have been required if the existing jail was remodeled, given that the existing jail would have been multi-story and less efficient for the movement of inmates. The additional 16 staff can be recruited from the existing populace in Seneca County. It is unlikely that this number of additional workers will result in any significant secondary growth inducing aspects of the action.

The only growth inducing action that could occur results from the extension of municipal services, such as sewer and water to either of the Kingdom Road jail sites. These sewer and water extensions are relatively short, and would result in sewer and water service to a localized portion of the Town of Seneca Falls. This

could result in development pressures on land currently in agricultural use. The zoning of an area determines what can be constructed in a location. The majority of the lands in the area of the Kingdom Road sewer extension is zoned A-1, except for the 500-foot wide strip on both sides of Kingdom Road, which is zoned A-2. The Zoning Code of the Town of Seneca Falls limits permitted uses in Agricultural Zones to churches, essential services, one family dwellings, primary and secondary schools, and public buildings. Extending the water main from the Town of Fayette and/or the water main and the sewer main from the Village of Seneca Falls site may induce growth within the area that can be serviced by those utility extensions. However, the extensions are relatively small in scale, and the zoning in those areas would limit the type of use that may occur.

11. Other Impacts

The project will result in minor irreversible and irretrievable commitment of resources, specifically the commitment of raw materials for the construction of the facility, and the on-going use of materials for operation of the facility. In addition, the project will impact old-field habitat at the Seneca Army Depot site or agricultural lands at the Kingdom Road site.

The project will result in adverse impacts that cannot be avoided. These include the fact that traffic in the vicinity of the site will be increased by construction worker vehicles. Regular users of the roadway may be inconvenienced by construction equipment and material deliveries as well as the installation of utilities. Grading operation on the building site will cause the loss of soil characteristics and result in some loss of soil materials by wind and water erosion. Additionally, native vegetation on the site in the immediate area of development and related site improvements will be removed. Wildlife habitats that may be present in the cleared area will be lost. This will force species inhabiting those areas to relocate elsewhere on the site or to adjacent lands, if habitat is available. The visual quality of the site will be altered during construction. Land that is currently predominately open space will be transformed into a developed area with a building, access way, and parking areas. Noise will be generated by construction equipment, delivery trucks and workers' vehicles during construction. Low levels of noise will be generated during operation of the project by lawn mowing and other outside activities such as recreation related noise, conversations en route to buildings from parking areas, etc., but should not produce levels of noise in the outdoors that will adversely affect the remaining undeveloped lands on this or adjacent properties. Wastewater will be generated by the project. Similarly, the project will consume water. The project will require provisions of other municipal services including fire and emergency and ambulance protection. These services exist and are adequate to accommodate the addition of this project to the community. In conclusion, the adverse impacts that cannot be avoided consist primarily of short-term impacts that relate to the project's construction activities. Long-term adverse impacts relative to the operation of the

project include the generation and treatment of sanitary sewage, water consumption, and generation of solid waste. None of these impacts have been determined to be significant.

The proposed project will not cause a major use of energy. The project will be more energy efficient than the current facility.

TABLE OF CONTENTS

EXECUTIVE SUMMARY	I
1. Proposed Project	i
2. SEQRA Process	v
3. Need for Project.....	vii
4. Alternatives Analysis.....	viii
5. Status of Permits and Approvals	x
6. Existing Conditions.....	xii
7. Significant Beneficial and Adverse Impacts	xii
8. Seneca Army Depot Site Environmental Impacts / Mitigation Measures	xii
9. Kingdom Road Sites Environmental Impacts / Mitigation Measures	xviii
10. Secondary and Growth Inducing Impacts	xxi
11. Other Impacts	xxii
1.0 PUBLIC COMMENT.....	1
June 10, 2002 letter from US Army Corps of Engineers	2
June 10, 2002 letter from US Army Corps of Engineers Continued..	3
June 10, 2002 letter from US Army Corps of Engineers Continued..	4
June 10, 2002 letter from US Army Corps of Engineers Continued..	5
July 10, 2002 Letter from NYSDEC.....	6
October 9, 2002 Letter from NYSDOT.....	7
October 9, 2002 Letter from NYSDOT Continued	8

October 9, 2002 Letter from NYSDOT Continued 9

September 19, 2002 Letter from Chazen Companies to NYSDOT.... 10

September 19, 2002 Letter from Chazen Companies to NYSDOT
Continued..... 11

September 18, 2002 Letter from SRF & Associates to Chazen
Companies..... 12

September 18, 2002 Letter from SRF & Associates to Chazen
Companies Continued 13

September 18, 2002 Letter from SRF & Associates to Chazen
Companies Continued 14

2.0 RESPONSE TO COMMENTS..... 15

2.1 Kingdom Road Sites as Location for Jail 15

2.2 Wetlands and Waters at the Seneca Army Depot Site 15

2.3 New York State Department of Environmental Conservation
16

2.4 Traffic 16

2.5 Stormwater Management Plan..... 18

LIST OF FIGURES

FIGURE 2.4-1 REVISED SITE PLAN..... 17

1.0 PUBLIC COMMENT

This section of the FEIS contains the public comments received in response to the DEIS and the SEIS for this project. It should be noted that the Seneca County Board of Supervisors received a petition signed by numerous members of the public opposed to the Kingdom Road site at a January 23, 2002 meeting of the Seneca County Board of Supervisors. The public hearing for the DEIS for the Kingdom Road sites was held on January 22, 2002.



REPLY TO:
ATTENTION OF:

DEPARTMENT OF THE ARMY
BUFFALO DISTRICT, CORPS OF ENGINEERS
1776 NIAGARA STREET
BUFFALO, NEW YORK 14207-3199

RECEIVED
JUN 14 2002

June 10, 2002

BY:.....

Regulatory Branch

SUBJECT: Department of the Army Permit Requirements and
Jurisdictional Determination for Application No. 2002-00779(0)

Ms. Barbara B. Beall
The Chazen Companies
110 Glen Street
Glens Falls, New York 12801

Dear Ms. Beall:

Reference is made to your recent request for a jurisdictional determination regarding waters of the United States (U.S.) located within the parcel proposed for the Seneca County Public Safety Building and Jail. The parcel is located at the Seneca Army Depot, Route 96 in the Town of Romulus, Seneca County, NY.

I have reviewed the resource information you have provided for the parcel. I am in agreement with your conclusion that the site does not contain any federally regulated wetlands. Further, the site does contain Hicks Gully, which is a tributary to Seneca Lake and a regulated water of the U.S.

Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers regulates the discharge of dredged or fill material into waters of the U.S., including freshwater wetlands. Certain types of excavation activities are defined as discharges of dredged material when they occur in waters of the United States. For instance, landclearing using mechanized equipment, ditching, channelization and other types of excavation when performed in such waters, including wetlands, would likely be regulated under Section 404 of the Clean Water Act.

If you propose to discharge dredged or fill material into Hicks Gully, you will need a Department of the Army permit. Therefore, I am enclosing the following for your future use:

- a. a Department of the Army permit application
- b. a list of required drawing elements

Prior to submitting your application, please ensure that all of the requested information is properly identified and labelled to ensure that we can readily conduct our evaluation. If you are

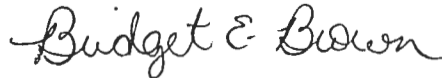
Regulatory Branch

SUBJECT: Department of the Army Permit Requirements and
Jurisdictional Determination for Application No. 2002-00779(0)

enclosing photographs, the photo locations should be indicated on one or more of the attached maps. Although it is not possible to predict how long it will take to complete our evaluation, a properly completed application will expedite this process. Your cooperation in this matter is appreciated. Finally, in addition to our review, your application will be forwarded to the New York State Department of Environmental Conservation (DEC). DEC will determine, independent of our review, if your project requires a state permit. DEC will directly notify you of their determination. If you do not hear from DEC prior to when you intend to initiate work you are strongly encouraged to contact DEC to ensure that you have fulfilled all their regulatory requirements. For your reference, a list of DEC regions, with addresses and telephone numbers, is included on the back of the application.

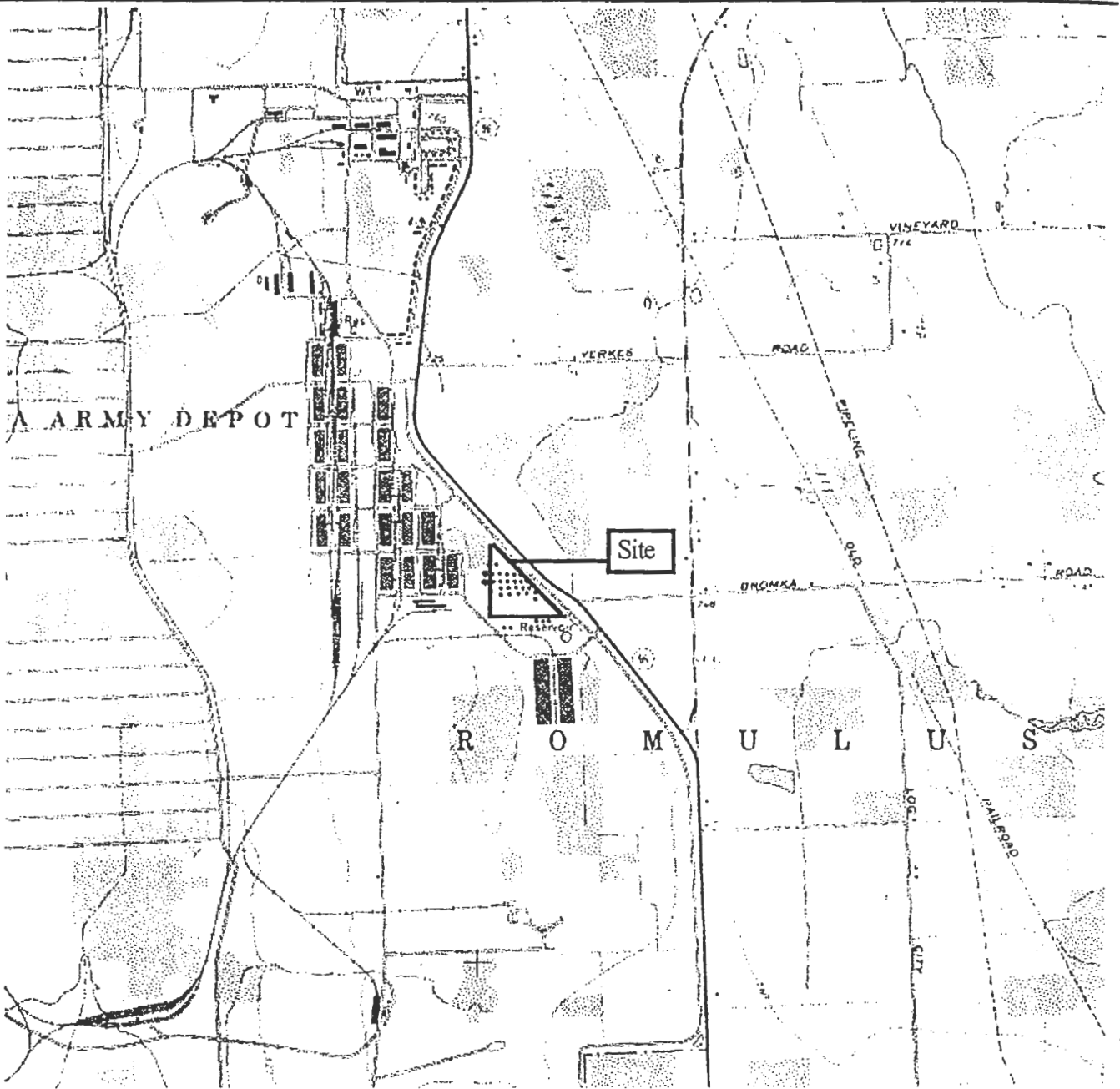
Questions pertaining to this matter should be directed to me at (315) 255-8090, by writing to the following address: U.S. Army Corps of Engineers, 7413 County House Road, Auburn, New York 13021, or by e-mail at: bridget.brown@usace.army.mil

Sincerely,



Bridget E. Brown
Biologist

Enclosures



42.72426 76.8324

THE
Chazen
 COMPANIES

ENGINEERS/SURVEYORS
 LANDSCAPE ARCHITECTS
 ENVIRONMENTAL PROFESSIONALS
 PLANNERS

Seneca County Jail - US Army Depot Site
FIGURE
SITE LOCATION

Source: USGS Topographic Mapping
 7.5 minute series Ovid Quadrangle

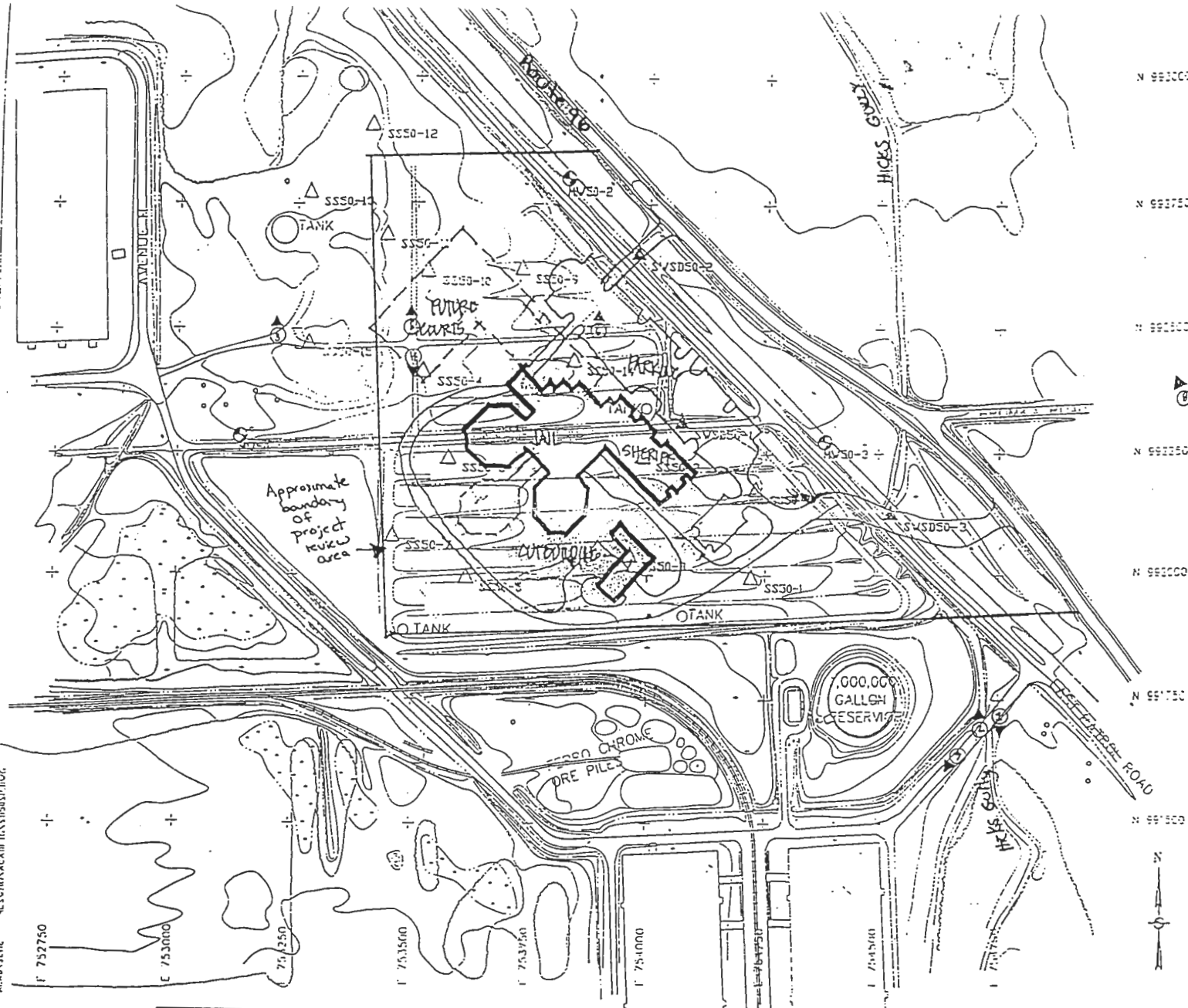


SENECA COUNTY BOARD OF SUPERVISORS
 D/A Processing No. 2002-00779(0)
 Seneca County, New York Quad: OVID
 Sheet 1 of 2

Glens Falls Office:
 110 Glen Street
 Glens Falls, NY 12801
 Phone: (518) 812-0531

Orange County Office:
 163 Route 17K
 Newburgh, NY 12550
 Phone: (845) 567-1133

Chazen Project No. 90114.02



LEGEND

	MINOR WATERWAY
	MAJOR WATERWAY
	FENCE
	UNPAVED ROAD
	EASEMENT LINE
	LANDFILL ELEVATION
	RAILROAD
	GROUND SURFACE ELEVATION CONTOUR
	ROAD SIGN
	DECIDUOUS TREE
	GUIDE POST
	FIRE HYDRANT
	MANHOLE
	COORDINATE GRID INTERSECTION
	POLE
	UTILITY BOX
	OVERHEAD UTILITY POLE
	MAILED MAIL SIGNAL

Proposed Site Plan
With Photos

for Seneca County Public Safety Building + Jail

LEGEND

	MONITORING WELL
	SURVEY MONUMENT
	SOIL BORING
	SURFACE SOIL SAMPLE
	SEDIMENT SAMPLE
	SURFACE WATER/ SEDIMENT SAMPLE
	TEST PIT

100 0 100 200
(feet)

PARSONS
PARSONS ENGINEERING SCIENCE, INC.

PROJECT TITLE
**SENECA ARMY DEPOT
EXPANDED SITE INSPECTION
8 MODERATELY-LOW PRIORITY LOC'S**

ENVIRONMENTAL ENGINEERING 720618-01002

**FIGURE 2.10-2
SEAD-50 TANK FARM AREA
LOCATION OF SAMPLING POINTS**

Scale: 1" = 200'

- project review area does Not contain any Federal Wetlands
- Hicks Gully is a water of the US + a permit will be required for any proposed impacts

SENECA COUNTY BOARD OF SUPERVISORS
D/A Processing No. 2002-00779(0)
Seneca County, New York Quad: OVID
Sheet 2 of 2

New York State Department of Environmental Conservation**Division of Environmental Permits, Region 8**

6274 East Avon-Lima Road, Avon, New York 14414-9519

Phone: (585) 226-2466 • FAX: (585) 226-2830

Website: www.dec.state.ny.us

Erin M. Crotty
Commissioner

July 10, 2002

Keith Ashby
County Manager
Seneca County Board of Supervisors
Seneca County Offices
1 DiPronio Drive
Waterloo, NY 13165

Re: Draft Environmental Impact Statement
Seneca County Public Safety Building and Jail
at the Seneca Army Depot
Town of Romulus, Seneca County

Dear Mr. Ashby:

I have reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) as accepted by the lead agency June 12, 2002 and find that it is adequate for this agency to prepare any necessary Findings related to Department approvals. As you are aware, this Department's Division of Environmental Remediation and the U.S. Environmental Protection Agency, Region 2 office are actively working with the Army so that any site contamination matters will be resolved to allow the planned new use for this parcel of land.

I am available at (585) 226-5395.

Sincerely,

Robert K. Scott
Deputy Regional Permit Administrator

rks/kep

cc: Alicia Thome, NYSDEC Albany
Stephen Absolom, Seneca Army Depot
Julio F. Vazques, USEPA
file

Mr. Keith Ashby, Manager
October 9, 2002
Page 2

Drainage

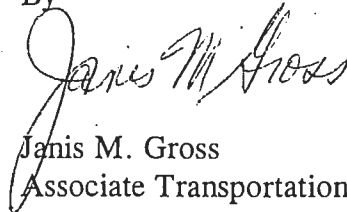
The discussion of the Stormwater Management Plan adequately addresses the anticipated mitigation in a conceptual manner. Some preliminary site specific facts would have been appropriate; such as does any portion of the site drainage to N.Y.S. Route 96? The Stormwater Management Plan (Drainage Report) should be completed in conformance with Department guidelines (attached) and submitted as part of the State Highway Work Permit application, as required for the driveway access.

If you have any questions, contact William Egloff, of my staff, at (315) 428-4409.

Very truly yours,

ALBERT S. VETTER, P.E.
Regional Planning and Program Manager

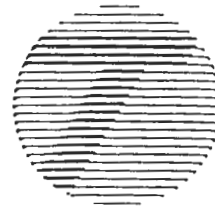
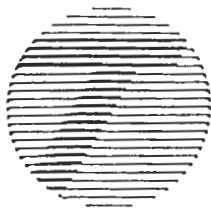
By



Janis M. Gross
Associate Transportation Analyst

Attachment

cc: B. Beall, The Chazen Corporation ←



NEW YORK STATE DEPARTMENT OF TRANSPORTATION

DRAINAGE REPORT REQUIREMENTS

The following guideline represents a minimum standard for the contents and format of a Drainage Study to be included in a Drainage Report. A Drainage Report submitted to the New York State Department of Transportation for review should include the following:

- Title Page
- Table of Contents
- Introduction
- Background Information/Project Description (with location map)
- Methodology
- Existing Conditions (w/ pre-development map and watershed areas w/ Tc routes)
- Proposed Conditions (w/ post-development map and watershed areas w/ Tc routes)
- Results of Analysis - Table of Peak Flows, etc.
- Stormwater Conveyance and Management System
 - Pipe size, type/material, condition, ditch information, grades, etc.
 - Detention basin, outlet pipe, structures, emergency spillway, etc.
- Summary/Conclusions
- Erosion and Sediment Control Plan
- Appendices/Design Drawings (22 in. x 34 in. Max.)
 - Existing conditions runoff calculations
 - Development conditions runoff calculations
 - Detention pond sizing calculations
 - Outlet structures and pipe sizing calculations
 - Pipe hydraulic analysis
 - Details

Notes:

- The Drainage Report shall be a bound and page-numbered document, signed and stamped by a licensed and registered professional engineer.
- In preparing a Drainage Report for a Highway Work Permit or as part of the SEQRA process, the designer should be aware of NYSDOT's policy on accepting private drainage to the State drainage system. Specifically, the post-development flow must be limited to the pre-development flow. This may require mitigation measures such as the use of detention basins or other similar means of holding back flow.
- Closed drainage systems (pipes with CB, DI, MH, etc.) shall be designed for a 10-year storm event and open systems (culverts, etc.) shall be designed for a 50-year storm event.

CHAZEN ENGINEERING & LAND SURVEYING Co., P.C.

TO BARB
90114.07

Dutchess County Office
Phone: (845) 454-3980

110 Glen Street, Glens Falls, New York 12801
Phone: (518) 812-0513 Fax: (518) 812-2205
Email: glensfalls@chazencompanies.com

Orange County Office
Phone: (845) 567-1133

New England Office
Phone: (781) 556-1037

Capital District Office
Phone: (518) 235-8050

September 19, 2002

Mr. William Egloff
NYSDOT Region 3
333 East Washington Street
Syracuse, NY 13202

Re: *Notice of Acceptance of Complete SDEIS and Public Notice Comment Period
Seneca County Jail at the Seneca Army Depot Site
Job # 90114.03*

Dear Mr. Egloff:

The Chazen Companies has been coordinating the SEQR review for the Seneca County Jail to be located at the Seneca Army Depot in the Town of Romulus, Seneca County, New York.

A Lead Agency Coordination Period was conducted in September 2001 for the first site being proposed for the Seneca County Jail, located at the NE corner of Kingdom Road and County House Road in the Town of Seneca Falls. Since Kingdom Road and County House Roads are both County Roads there was no need to coordinate with the NYSDOT under SEQRA. When the site switched to the Seneca Army Depot Site, which is located off of NYS Route 96, a Supplemental EIS was prepared and circulated to the involved and interested agencies. However the fact that NYSDOT should have been included as an additional involved agency under SEQRA because of the need for a NYSDOT curb cut onto State Route 96 for access drives was overlooked. We apologize for this oversight.

Enclosed are three copies of the SEIS for this project for your review. While I am sure you will want to review the entire SEIS, please note that the traffic study prepared by SRF & Associates (SRFA) is included in Appendix A, and traffic is also discussed in Sections 3.2.4 (page 18), and Section 4.4 (page 45) of the main body of the SEIS.

Subsequent to the SEIS, there have been no changes to the traffic-generating program at the jail. However, the site plan has changed to move the driveways north for a variety of reasons including the need to avoid impacts to ACOE wetlands associated with Hicks Gully. The revised site plan is attached and can be compared to the site plan in the SEIS found on Figure 3.4.3 on page 15.

As documented in the attached September 18, 2002 letter from SRFA, they have had an opportunity to review the revised site plan for the project. The SRFA letter states: "Although relocation of the driveways will result in a slight re-distribution of traffic to/from

Brokma Road, no changes in projected levels of service are anticipated based on inspection of the previously projected distribution and resulting levels of service. The results of the auxiliary turn lane investigations are also unlikely to be altered given the low traffic volumes projected during the critical peak hour. Relocation of the driveways is not expected to significantly change the available sight distance on Route 96 due to the horizontal curvature of the highway which positively affects the sight distance and the excessive clear zones on both sides of Route 96 in the vicinity of the site."

The SRFA letter goes on to state that the changes to the site plan and parking layout may result in a re-distribution of traffic between the two site driveways. The Traffic Report [in the SEIS] identified a distribution that resulted in 86% of the site generated traffic entering/exiting the site via the northerly driveway. The corresponding levels of service were "A" on all approaches during both peak hours. SRFA states that while site generated traffic may be more equitably proportioned between the two site access points, the resulting levels of service can be expected to remain an "A" condition give the analysis contained in the Traffic Report." The SRFA letter ends by stating "the conclusions and modifications of the May 2002 Traffic Impact Study remain valid for the modified site plan and that no additional analysis is required."

The SRFA analysis and subsequent review of the revised site plan indicates that there are no significant traffic issues. The comment period on the SDEIS was originally for a period of one month. We wish to provide the NYSDOT one month to review and comment on this SDEIS, ending on October 19, 2002. Anything that your staff could do to complete the review in a shorter timeframe would be greatly appreciated.

Amy Dake at SRF has been coordinating the Traffic Study. She can be reached at 585-272-4660. Comments on the SEIS should be submitted to Keith Ashby, Seneca County Manager, Seneca County Offices, 1 DiPronio Drive, Waterloo, NY 13165. Mr. Ashby's phone number is (315) 539-1705, and fax number is (315) 539-0207. It would be very helpful if you could provide a copy of the comments to me at the above address.

Sincerely,



Barbara B. Beall, PWS
Sr. Environmental Scientist
Wetland Specialist

BBB/bbb Encl.

cc: Amy Dake, SRF Associates
Matt Chatfield, Clough Harbor
Keith Ashby, Seneca County Manager

SRF & ASSOCIATES
Traffic Engineering
&
Planning Consultants

(585) 272 - 4660 phone
(585) 272 - 4662 fax

3495 Winton Place
Building E, Suite 110
Rochester, NY 14623

September 18, 2002

Ms. Barbara Beall
The Chazen Companies
110 Glen Street
Glens Falls, New York 12801

RE: Seneca County Jail

Dear Ms. Beall:

We have evaluated the revised conceptual site plan for the proposed Seneca County Jail Facility with respect to our Traffic Impact Study dated May 2002. It is our understanding that the program proposed for the facility has not been altered. It is noted that the driveways have been relocated such that the southerly driveway is located approximately 375 feet north of Bromka Road and the northerly driveway is located approximately 600 feet north of the southerly driveway (975 feet north of Bromka Road).

Although relocation of the driveways will result in a slight re-distribution of traffic to/from Bromka Road, no changes in projected levels of service are anticipated based on inspection of the previously projected distribution and resulting levels of service. The results of the auxiliary turn lane investigation are also unlikely to be altered given the low traffic volumes projected during the critical peak hours.

Relocation of the driveways is not expected to significantly change the available sight distance on Route 96 due to the horizontal curvature of the highway which positively affects the sight distance and the excessive clear zones on both side of Route 96 in the vicinity of the site.

It is noted that changes to the site plan and parking layout may result in a re-distribution of traffic between the two site driveways. The Traffic Report identified a distribution that resulted in 86% of the site generated traffic entering/exiting the site via the northerly driveway. The corresponding levels of service were "A" on all approaches during both peak hours. Site generated traffic may be more equitably proportioned between the two

site access points, however, resulting levels of service can be expected to remain an "A" condition given the analysis contained in the Traffic Report.

Based on this evaluation, it is concluded that the conclusions and recommendations of the May 2002 Traffic Impact Study remain valid for the modified site plan and that no additional analysis is required.

If you have any questions concerning this evaluation or require additional information, please do not hesitate to contact our office.

Very truly yours,
SRF & Associates



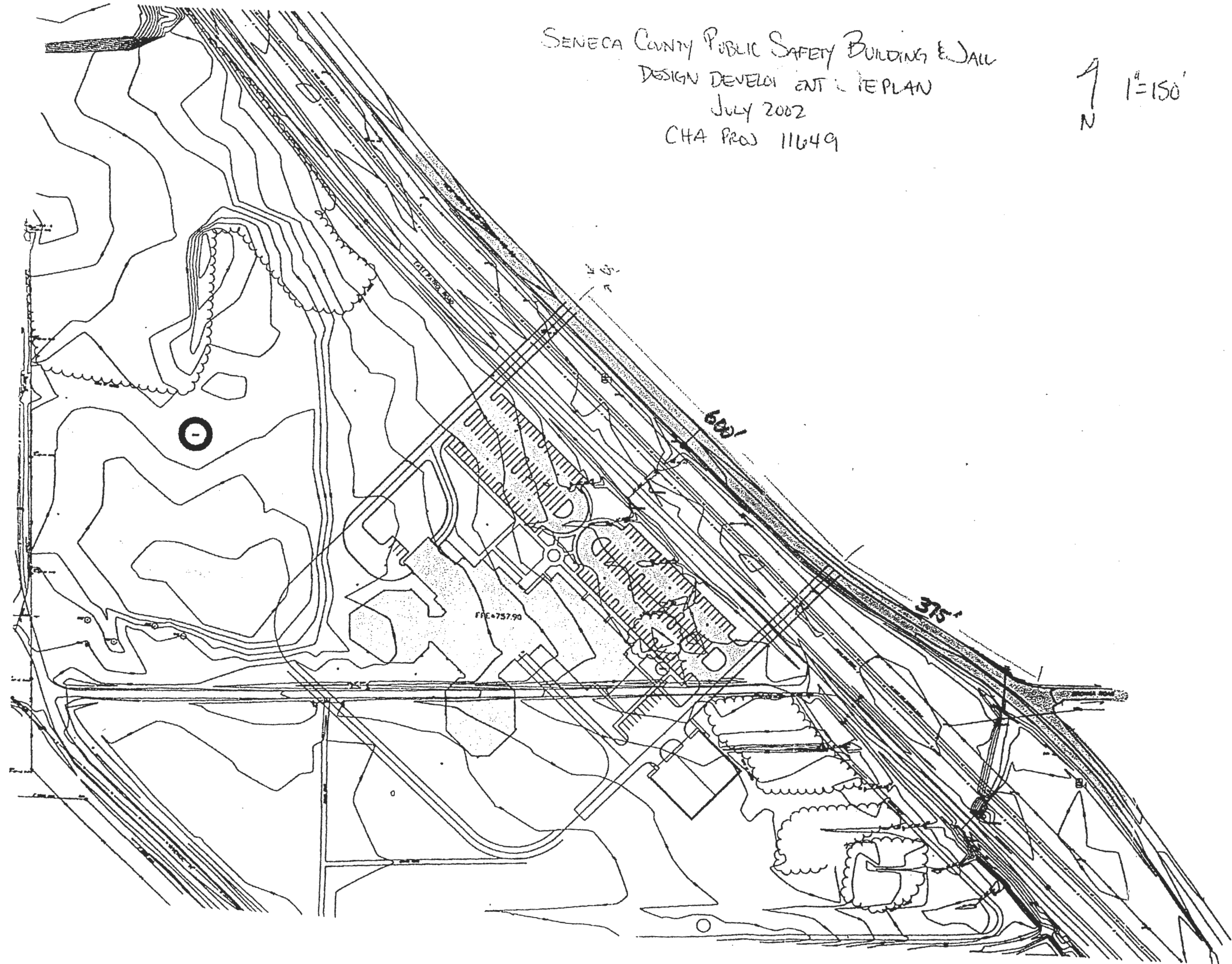
Stephen R. Ferranti, P.E., P.T.O.E.
Principal Traffic Engineer

SRF/acd

file: cv091802.doc
pin: 21017

SENECA COUNTY PUBLIC SAFETY BUILDING & JAIL
DESIGN DEVELOPMENT SITE PLAN
JULY 2002
CHA PROJ 11649

1" = 150'
N



2.0 RESPONSE TO COMMENTS

2.1 Kingdom Road Sites as Location for Jail

Comment: A number of residents in the vicinity of the Kingdom Road site(s) in the Town of Seneca Falls spoke out against siting the jail in this location at a January 23, 2002 meeting of the Board of Supervisors. In addition, a petition was provided to the Board of Supervisors signed by a number of residents in the area opposed to the location of the jail at this site.

Response: In response to neighbors' concerns, the Seneca County Board of Supervisors re-examined the potential for constructing the new Seneca County Public Safety Building at the Seneca Army Depot Site. An SEIS was prepared for that site, and submitted for public review and comment. No significant adverse environmental impacts were found at that site. The Seneca Army Depot site is the preferred site of the Seneca County Board of Supervisors.

It should be noted that no significant adverse environmental impacts were found at the Kingdom Road site(s) during the DEIS review process. Additional environmental work would need to be completed at these sites prior to any construction at the sites. For example, a Stage II archeological investigation was required for the two sites and for the utility line rights-of-way. In addition, permits would likely be needed from the NYSDEC and the US Army Corps of Engineers for utility line crossings of waters and wetlands. Finally, the agricultural impact assessment process would need to be finalized. However, none of these reviews or issues constitute a significant environmental impact under SEQRA.

2.2 Wetlands and Waters at the Seneca Army Depot Site

Comment: By letter dated June 10, 2002, the US Army Corps of Engineers commented that the site does not contain any federally regulated wetlands. Further, the site does contain Hicks Gully, which is a tributary to Seneca Lake, and a regulated water of the United States. A permit would be needed from the US Army Corps of Engineers for any project that involves the discharge into Hicks Gully.

Response: The current site plan does not propose any discharges into Hicks Gully. The access road alignments have been modified to include only one alignment, in a location that is to the north of the location where Hicks Gully crosses NYS Route 96. Under the current site plan, no permits are required from the US Army Corps of Engineers.

2.3 New York State Department of Environmental Conservation

Comment: By letter dated July 10, 2002, the New York State Department of Environmental Conservation commented that the Department finds that the SEIS is adequate for the agency to prepare any necessary Findings related to Department approvals. Further, the Department's division of Environmental Remediation and the US Environmental Protection Agency, Region 2 office are actively working with the Army so that any site contamination matters will be resolved to allow the planned new use for this parcel of land.

Response: Comment noted.

2.4 Traffic

Comment: By letter dated October 9, 2002, the NYSDOT commented on the SEIS. The NYSDOT indicated that they were in general agreement with the conclusions of the traffic analysis. They agreed that the site generated traffic volumes are expected to be low, and when combined with traffic on NYS Route 96, there will be little to no impact. However, the NYSDOT did not find a documented need to justify two driveways to the site from NYS Route 96. One driveway should be adequate and the traffic separation can be done on-site rather than with driveways onto NYS Route 96. The NYSDOT will only allow one driveway onto the site. It should be noted that the State prison on NYS Route 414 only has one driveway.

Response: The site plan has been modified to provide only one driveway leading to the site from NYS Route 96. Please see Figure 3.4-1 "Revised Site Plan," for additional details. The driveway is located in the same place as the northern driveway proposed previously, and so will provide the same adequate sight distances as the northern driveway in the previous site plan proposal.

FIGURE 2.4-1

SENECA COUNTY
PUBLIC SAFETY BUILDING
SECECA ARMY DEPOT, ROMULUS, NEW YORK

KEY PLAN

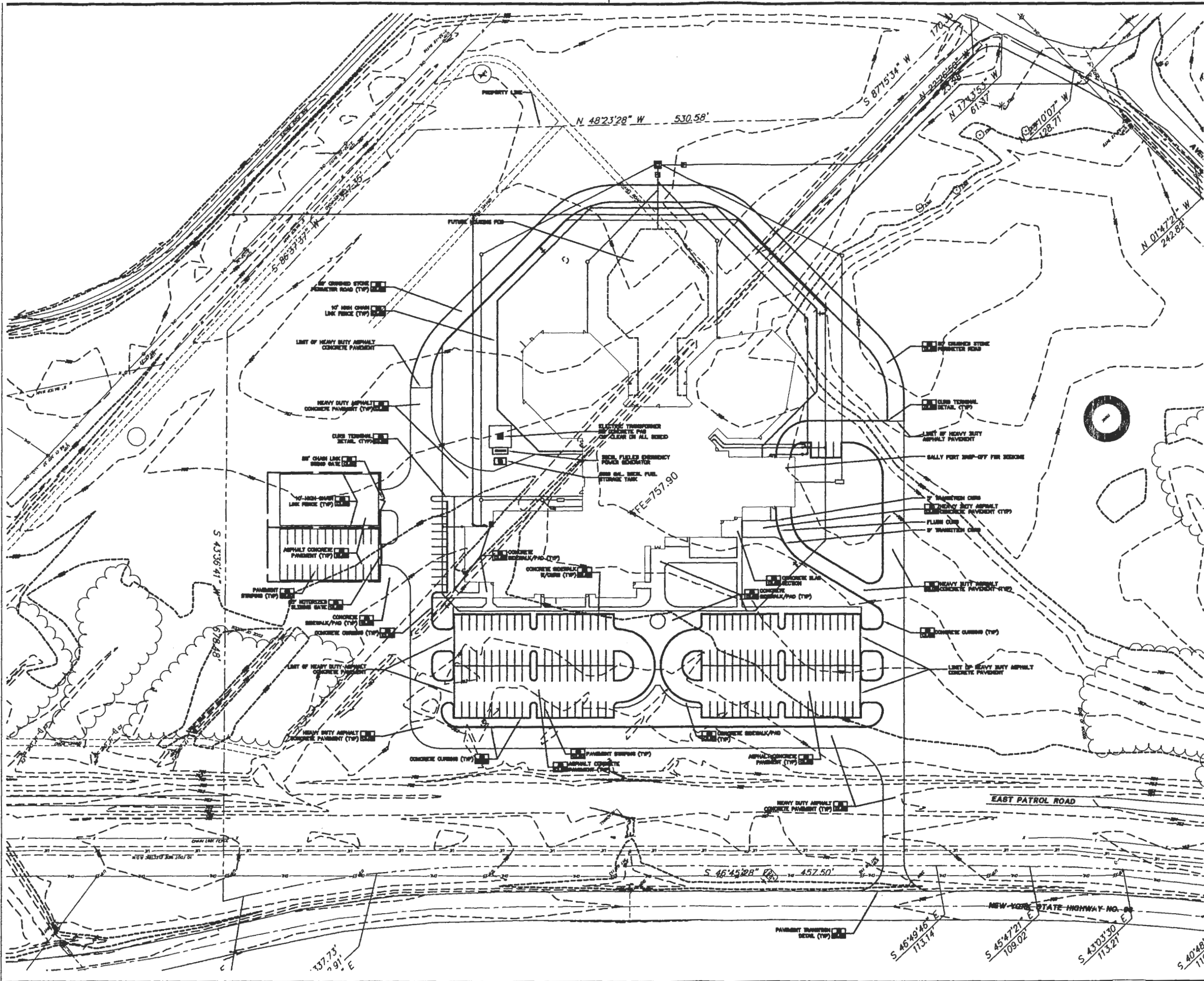


SHEET TITLE
REVISED SITE PLAN

SCALE: N.T.S.

JOB NO. 02049.00
DRAWN: MPC
CHECKED: X.Y.
DATE: 06/14/02 SHEET NUMBER: C1.04

NOT RELEASED FOR CONSTRUCTION



2.5 Stormwater Management Plan

Comment: By letter dated October 9, 2002, the NYSDOT commented on the Stormwater Management Plan. The NYSDOT stated that the discussion of the Stormwater Management Plan adequately addresses the anticipated mitigation in a conceptual manner. The NYSDOT requested some additional information including whether any portion of the site drains to NYS Route 96. The NYSDOT requested that the Stormwater Management Plan (Drainage Report) be completed in accordance with the Department guidelines (attached to NYSDOT's comment letter) and submitted as part of the State Highway Work Permit application as required for the driveway access.

Response: A Stormwater Management Plan will be completed in accordance with the Department's Guidelines and will be submitted as part of the State Highway Work Permit application as required for the driveway access. The Plan will described the existing and proposed drainage conditions, including whether any part of the site drains to NYS Route 96.

