

III.15 **Construction**

Comment No. 15-1

The FEIS should include a discussion of potential air quality impacts associated with off-site vehicle operations. Discussion should include available relevant information (i.e. number of work vehicles, number of heavy-duty trucks, references to any traffic comparison to the operational traffic analysis.)

(B-1, AKRF)

Response No. 15-1

The construction traffic, as explained below, will be far less than the operational traffic during the peak travel time periods and therefore will not create any air quality, noise or roadway capacity issues.

There will be an estimated 50 to 120 workers present on-site depending on the construction activities underway on a given day. Since the typical construction day is 7am to 4pm, it is anticipated that 90% of the workers will arrive before the am peak hour (7:30am to 8:30am), and that 95% will leave before the beginning of the pm rush hour (5:00pm to 6:00pm). A comparison of the construction peak hour trips vs the operational peak hour trips is presented below.

Time Period	Construction Trips			Operation Trips ³	Construction as a % of Operation
	Workers ¹	Trucks ²	Total		
AM Peak Hour	12	3	15	120	13%
PM Peak Hour	6	1	7	145	5%

1 - assumes maximum of 120 workers

2 - assumes most deliveries are off-peak

3 - value is for one building out of two

Comment No. 15-2

The FEIS should include a discussion of emissions from on-site construction equipment. Comparison to the operational air quality assessment is not sufficient as there will be no such sources in the Future with the Proposed Project.

(B-1, AKRF)

Response No. 15-2

The current NYSDOT guidelines (NYSDOT Environmental Procedures Manual (EPM)) Chapter 1.1 Section 15 states that:

Modeling of carbon monoxide (CO), or respirable particulate matter (PM10) impacts from construction is not normally required, because any construction related activities that cause temporary increases in emissions are self-correcting once the project is completed. However, there has been growing concern about air quality impacts due to traffic diversions on long-lasting construction projects. Consequently, if construction diversions or detours lasting 2 years or more (at a minimum, two consecutive CO seasons) at any one location, or permanent improvements to other facilities as a result of project detours/diversions are anticipated, an air quality analysis should be performed.

New York City's (NYC's) City Environment Quality Review (CEQR) Technical Manual, Chapter 22: Construction states:

Where the duration of construction is expected to be short-term (less than years), any impacts resulting from such short-term construction generally do not require detailed assessment.

The two buildings in the Preferred Alternative can each be constructed in approximately 18 months. The minimum distance of the two buildings are even

farther from the nearby residents as compared to the DEIS plan and are far from the residences, as summarized below.

CC&FC Building Number	Distance from Building to Closest Residence, Feet		
	Hunters Glen	Twin Brooks	2 Homes in Paterson
A	2,400	3,300	3,300
B	1,400	1,200	1,700

Because the construction periods are each less than two years and building construction is at very large distances (greater than 1/4 mile) from the nearest homes, a detailed analysis of air quality emissions during construction is not warranted.

Comment No. 15-3

The timeline - - as far as if this were to break ground, what is the proposed construction of the first phase, so we see that broken out?

(B-2, PH #1, Mr. Catalano)

Response No. 15-3

The project will be phased. Work will commence for Phase I with the site work associated with Building A, followed by the construction of this building. Subsequently, Phase 2 site work will be completed followed by construction of Building B. However, should a client prefer Building B, work would commence on Phase 2 first.

The total development cycle (site work plus building construction) will take approximately 18 months for each of the two proposed buildings, with no overlap. Thus, construction will take approximately 3 years in total. Site work for each building is anticipated to take approximately 40 weeks, with the construction of each building

taking approximately one year. All off-site improvements will be completed concurrently with the completion of the site work for Phase I.

Comment No. 15-4

But obviously, the proximity to the residences at Twin Brook are of particular concern to us.

Among other things, we are concerned about the impact of construction being so close to the residences and steps that will be taken to mitigate any construction.

(B-2, PH #1, Mr. Waldinger)

Response No. 15-4

Most of the construction for the buildings is far from the residences. See Response No. 15-2. In the Preferred Alternative, the closest building (Building B) is an additional 600 feet away from Twin Brook Manor as compared to Building 4 in the DEIS. That being said, site work construction will occur at similar locations and distances as described in the DEIS.

Mitigation measures for noise were discussed in Section III.L.5 of the DEIS, and for air quality in Section III.N.5.

Comment No. 15-5

I can't imagine that all this construction that would be going on, that you would not be able to hear that all throughout the two – the two complexes.

(B-2, PH #1, Ms. Carroll)

Response No. 15-5

With respect to noise impacts, construction activities will be limited to the hours and days as provided for in the Noise Ordinance. Worst case noise levels during building construction were presented in Table III.L-9 of the DEIS. It is reproduced below for comparison purposes.

Receptor #	Building #1		Building #2		Building #3		Building #4	
	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
1	54	50	56	52	61	57	61	57
2	51	47	52	48	56	52	58	54
3	51	47	53	49	57	53	69	65
4	51	47	54	50	56	52	65	61
5	55	51	56	52	60	56	60	56

The new table of worst case building construction noise levels is presented below.

Receptor #	Building A		Building B	
	Lmax	Leq	Lmax	Leq
1	56	52	61	57
2	54	50	59	55
3	53	49	62	58
4	53	49	59	55
5	56	52	60	56

In comparing the two tables, worst case building construction noise levels are essentially the same at Receptors 1, 2 and 5 in Hunters Glen. However, because of the reduced size and number of buildings, and shortened construction schedule the overall construction impacts will be less. Since Building B is farther south than the previously proposed Building 4, projected building construction noise levels at Receptor #3 (Hunters Glen) and Receptor #4 are 6 to 7 dBA lower, which is a significant reduction. That being said, site work construction will occur at similar locations and distances as described in the DEIS.

As discussed in the DEIS the average noise levels will be 3 to 6 dBA lower than the worst case noise levels. The construction noise will be audible at times but will not

be as loud as the peak noises (e.g. lawn mowing and other landscaping activities, car and truck traffic in the communities, trash removal, air conditioners, and snow removal) that exist in the communities now.

Comment No. 15-6

Potential hazardous runoff - - hazardous runoff from hundreds of construction and delivery vehicles, and the result in pollution.

(B-3, PH #2, Mr. Catalino)

Response No. 15-6

An Erosion and Sediment Control Management Program will be implemented for the proposed development, beginning at the start of construction and continuing throughout its course, as outlined in the "New York State Standards and Specifications for Erosion and Sediment Control," dated November 2016. A continuing maintenance program will be implemented for the control of sediment transport and erosion control after construction and throughout the useful life of the project.

The Applicant will have a qualified professional conduct an assessment of the site prior to the commencement of construction and certify that the appropriate erosion and sediment controls, as shown on the Erosion & Sediment Control Plans, have been adequately installed to ensure overall preparedness of the site for the commencement of construction. In addition, the Applicant will have a qualified professional conduct one site inspection at least every seven calendar days and at least two site inspections every seven calendar days when greater than five acres of soil is disturbed at any one time. As part of the Erosion and Sediment Control measures, in accordance with NYSDEC regulations and as stated in the SWPPP, post spill procedure information must be provided on site, and persons trained in handling spills must either be on site or on call at all times. Materials for cleaning up spills are to be kept on site and easily available.

As a result of these standard practices, no hazardous runoff is be anticipated from construction activities.

Additional details may be found in the DEIS Section III.D.4.e

Comment No. 15-7

This construction project will have a detrimental effect to our surrounding areas because of the noise, air quality, infringement on surface water that drains into the Middle Branch Reservoir and wetlands.

(B-7, Patricia Williamson)

Construction [noise pollution]

(B-101, Jack Pizzicara)

I am very concerned about the noise and air pollution just during the construction period only.

(B-103, Donna Shenkman)

*During the **unspecified time allotted for construction**, (which is proposed to have more than one phase), the project would **exceed ambient noise levels**.*

(B-104, Nathalie Del Vecchio and Roberto Molina)

Response No. 15-7

Additional details regarding the construction schedule may be found in Response No. 15-3.

With respect to potential water quality impacts: because of preparation and implementation of a Soil and Erosion Control Plan (see Response 15-6), and the proper placement of tracking pads and wash stations to ensure that trucks do not

bring soil from the site when they leave, there are no anticipated water quality impacts to wetlands or waterbodies anticipated.

With respect to potential air quality impacts, building construction activities will occur far from any residents. As discussed in Response No. 15-2, the project has been downsized and moved further from Twin Brook Manor. Buildings A and B are approximately ¼ mile from the closest residences. Because of the large distances there are anticipated to be no adverse air quality impacts during construction.

With respect to noise impacts related to construction activities see Response No. 15-5.

Comment No. 15-8

The construction of such an enormous project will impact not only residents but all who want to visit our area.

(B-33, Marie DiDonato)

Response No. 15-8

Construction activities that will occur in areas where visitors may be traveling are the addition of one lane in each direction on NY 312 from the Pugsley Road intersection to the I-84 Eastbound ramps/Independent Way. Also, a demand responsive signal is proposed at the intersection of NY 312 with Pugsley Road. However, a Work Zone and Traffic Control Plan will help minimize disruptions to the travelling public. No improvements are proposed for US 6 or Fair Street. Improvements to Pugsley Road, which is less travelled, will include widening and reconstruction to heavy-duty pavement standards that are designed to accommodate the type of truck traffic anticipated at the proposed facility.

Comment No. 15-9

The hours of construction (7:00 am to 8:00 pm on weekdays and 9:00 am to 5:00 pm on Saturdays) are unacceptable. Given the massive size of the development and the proximity to residences we urge that work that would entail any use of construction vehicles, blasting or chipping, or other work that would increase noise at the Hunters Glen property line be limited from 9:00 am to 5:00 pm on weekdays, and prohibited on holidays and weekends.
(B-98, Snyder & Snyder)

Tractor-Trailers in small roads is recipe for disaster and accidents.
(B-98, Snyder & Snyder)

Response No. 15-9

During construction, this project will comply with the Town's Noise Ordinance, Chapter 96, Noise.

Comment No. 15-10

A detailed construction phasing plan is not provided in the DEIS and SWPPP. In addition, the associated sequence of operations within each construction phase is missing. These required elements must be addressed.
(B-108, Watershed Inspector General)

Can you break down the project by year starting in year zero? To include:
◦ *Construction timetable: roads, infrastructure, round-about, buildings*
(B-154, Carlos Passi)

What is the sequence and time frame of the build out/construction of each warehouse? Will the excavation be done for all four warehouses at once or would each individual warehouse

*be built entirely as a separate project?
(B-155, Cathy Croft)*

Response No. 15-10

See Response 15-3. The roadway improvements will be constructed concurrently with the site work, and will be completed by the completion of the first building.

Comment No. 15-11

*The site plans provided do not demonstrate that adequate phasing has been achieved through a balanced erosion and soil control plan to minimize the potential impacts to land and water. A cut and fill balance must be provided to realistically show that the project can be built and remain under the NYSDEC five (5) acres maximum clearing limit at any one time.
(B-137, NYCDEP)*

Response No. 15-11

Due to the relatively large size of the proposed buildings to be constructed and related improvements, the Applicant will seek a waiver from the 5 acre limit from the regulated, traditional land use control MS-4 (Town of Southeast).

The intent of the grading design of the site is to balance the earthwork, such that no excess material will need to be exported off of the site, and no material will need to be brought into the site as fill. The current grading design results in an approximate balance with 622,000 cubic yards of cut and the same quantity of fill, for a net site balance. The site is large, and should it be necessary any excess amount of excavated material will be utilized as berm material within the limit of disturbance.