



***Environmental, Planning, and Engineering Consultants***

34 South Broadway  
Suite 401  
White Plains, NY 10601  
tel: 914 949-7336  
fax: 914 949-7559  
[www.akrf.com](http://www.akrf.com)

## Memorandum

---

**To:** KG+D Architects  
**From:** AKRF, Inc.  
**Date:** March 18, 2022  
**Re:** Brewster Yards DEIS Completeness Initial Comments  
**cc:** Victoria Desidero and Tom LaPerch, Town of Southeast Planning Board

---

AKRF, Inc. has initiated its informal completeness review of the preliminary Draft Environmental Impact Statement (DEIS), submitted in sections starting on February 18, 2022. The purpose of this informal completeness review is to determine whether all relevant information is presented and analyzed in a complete and understandable format for the purpose of public review, and that document has been prepared in accordance with the Final Scoping Document.

### GENERAL

1. The Planning Board Secretary requests that digital files be provided on a storage device when the application is ready for submission.
2. Acronyms should be defined upon first use of the term in each chapter and should not be redefined throughout the chapter. Acronyms used should be consistent (e.g., Chapter 13 uses both EPA and USEPA).

### EXECUTIVE SUMMARY

3. The second sentence under the Project Description subsection on page 1 is an incomplete sentence.
4. The first sentence in the second paragraph under the Project Description subsection should read "Brewster Yards is proposed..."
5. In the list of approvals and involved agencies, stormwater pollution prevention plan approval should be added under the Town Planning Board section.
6. The discussion of consistency with public policy documents does not belong under the Mitigation Measures section (see similar comments on Chapter 2 and Chapter 17 below).
7. On page 5, the PCBES acronym should be written out.
8. Page 5 states "Adjustment of the alignment of the northern project driveway will also be reviewed by the Applicant to further discourage right turns." As noted below in the comments on Chapter 3, this is not discussed in Chapter 11 Traffic or in Appendix J Traffic Impact Study. This statement should either

be removed from the Executive Summary or a discussion of potential driveway alignment adjustments should be added to Chapter 11 and Appendix J.

9. Page 9 states “If any protected tree is inadvertently damaged, it shall be repaired by an approved tree surgeon.” This text should most likely state “by a certified arborist.” AKRF is unfamiliar with the term “approved tree surgeon.”
10. Page 12 states that 22 acres of impervious surfaces would be created. This is not consistent with the 10.7 acres documented in the SWPPP included in Appendix E.
11. On page 13, the last bullet under the list of temporary erosion and sediment control facilities should be removed as it is a permanent measure and is included in the permanent measures bullet list farther down that page.
12. The Traffic and Transportation subsection starting on Page 13 is too detailed. The signal timing adjustments should be moved to the Mitigation Measures subsection. The Level of Service Summary Table does not need to be reproduced in the Executive Summary – a brief description of the intersections with a significant impact to level of service requiring mitigation should be sufficient.
13. The first sentence on page 16 (the Parking and Site Circulation subsection) is incomplete.
14. In the last paragraph on page 17, the mention of “SDSTS” should say “SSTS.”
15. Page 18 states “Three signalized intersections and two unsignalized, stop sign controlled intersections provide access to the site.” This text should be clarified to state that three signalized intersections were found to have a level of service D or E (thus requiring further air quality analysis), since a fourth signalized intersection (NYS Route 312/Pugsley Road) was evaluated in Chapter 11.
16. On page 18, the sentence above the bullet list should read “...stored or stockpiled...”
17. The Alternatives section on page 20 should include a brief description of each alternative. The text below the bullet list should be revised as the “narrative assessments” are included in Chapter 16, not in the Executive Summary.
18. See the comments regarding Table 16-1 in the section below for Chapter 16 Alternatives.

## **CHAPTER 1: PROJECT DESCRIPTION**

19. The scoping document states that the Project Purpose and Need section should describe how public access would be accommodated for the parcels at the Pugsley Road site that will remain Town-owned open space. It would be helpful to show the proposed access easements on a figure.
20. The scoping document states that the Project Description should describe the public access and parking to be provided for the proposed walking trail on the open space lot. It may be helpful to show the proposed trail on Figure 1-3. A statement should be added within the discussion of parking space calculations regarding the ability of the proposed number of parking spaces to also serve this use.
21. Per the scoping document, the Project Description should discuss loading requirements. Table 1-1 indicates no loading spaces are required. It should be confirmed that loading spaces will not be required for the project.
22. Per the scoping document, the Project Description should discuss provisions to preserve buffers around the project. This was not mentioned and should be added.
23. In Table 1-1 the parking requirements row for the athletic fields should be updated to reflect 1,055 seats and 211 required parking spaces, and the total required parking should be updated to 336 spaces.

## **CHAPTER 2: LAND USE, ZONING, AND PUBLIC POLICY**

24. The Public Policy discussion under the Mitigation Measures section should be moved to the Potential Impacts section as it discusses how elements of the project would be compatible with the plans. The

paragraph regarding public policy currently under the Potential Impacts section may fit better under the Mitigation Measures section.

### **CHAPTER 3: COMMUNITY SERVICES**

25. The introduction describes the indoor recreation facility as ±32,000 square feet. This should be updated to ±35,000 square feet for consistency with Chapter 1.
26. The patronage and employment projections between Chapter 1 and Chapter 3 should be consistent. Chapter 3 states that weekday peak season use would be no more than 360 patrons whereas Chapter 1 states 358. Chapter 3 states weekend peak season use would be up to 1,100 whereas Chapter 1 states 1,023. Chapter 3 states the project would employ up to 70 people during peak use whereas Chapter 1 and Chapter 4 state up to 63 people.
27. The Emergency Medical Services section should note the distance between the project site and the nearest dispatch location.
28. In Section 3.5.2, the phrase “were included” should be added to the end of the following sentence: “Measures to mitigate potential impacts from the larger projects proposed to the serving community departments.”
29. Section 3.6 Mitigation Measures states “Adjustment of the alignment of the northern project driveway will also be reviewed by the Applicant to further discourage right turns.” This is not discussed in Chapter 11 Traffic or in Appendix J Traffic Impact Study. This statement should either be removed from Chapter 3 or a discussion of potential driveway alignment adjustments should be added to Chapter 11 and Appendix J.

### **CHAPTER 4: ECONOMIC CONDITIONS**

30. As with Chapter 3, the square footage of the indoor recreation facility and the patronage and employee numbers in the introduction to Chapter 4 should be updated to be consistent with Chapter 1.
31. In Footnote 4 on page 4-5, the mention of “50” in the third line should be corrected to “48.”
32. The last sentence in the first paragraph on page 4-6 refers to Table 4.4-2. The table numbering in Chapter 4 does not use this structure, although some other chapters do. A consistent table numbering structure should be used. It should be clarified which table is meant to be referenced here.
33. On page 4-7, it is stated that the market values for the two lots (45.-1-10 and 45.-1-11) as of July 1, 2020 were used to calculate project’s assessed value. However, given that portions of each of these lots will be transferred to town ownership, the market value (and therefore estimated property tax revenues) should be adjusted accordingly.
34. There is a typo in the website address in Footnote 9 on page 4-7. Aside from the typo, it appears the website address has changed. The Applicant should verify the address and correct it as necessary.

### **CHAPTER 5: VISUAL RESOURCES**

35. A word is missing in the following sentence on page 5-1: “The memorandum relates to assessing and mitigating visual impacts of proposed facilities may be located in visual proximity to visually sensitive land uses.”
36. The first paragraph on page 5-2 refers to “industrial development to the west of the Interstate on International Boulevard.” This should have read “to the east of...”
37. On page 5-7, the View from International Boulevard subsection states “The tree cover to remain on the ridgeline parcel would obscure view of proposed improvements on the north end of the site.” This sentence does not seem to apply to this viewshed discussion. The ridgeline area at the north end of the site is not within Sight Line Profile 5. Even from the northern end of International Boulevard, it does

not seem that the ridgeline area would be located between a viewer on International Boulevard and any proposed project elements.

38. The last sentence in the View from Pugsley Road and Fields Corner Road subsection on page 5-7 should read "...especially during the non-winter months."
39. The bus parking area depicted in Figures 5-7 and 5-8 does not match Figure 1-3, Figure 5-9, the turning movement diagrams in Appendix J, or the civil drawings.
40. Page 5-10 mentions "Southeast Executive Park." This was not previously discussed in the chapter; it should be clarified where this is located.
41. As required by §138-98.G of the Zoning Code, "recreational sports facility lighting shall comply with Illuminating Engineering Society of North America (IESNA) recommendations." This was not mentioned in the lighting discussion. Compliance with this requirement should be noted.

## **CHAPTER 6: CULTURAL RESOURCES**

No comments on this chapter.

## **CHAPTER 7: NATURAL RESOURCES**

42. The text on page 7-1 discusses Wetland B, Wetland D, and Wetland LC-28. These wetland labels should be identified on Figure 7-1.
43. The text under Section 7.4 Existing Impacts starting on page 7-4 with the paragraph "EA staff requested..." down through the discussion of "summer roosting, brooding, and foraging habitat" should be moved to the Existing Conditions section. The Potential Impacts section should then pick up with the discussion of the timing for felling of trees.
44. The text on page 7-4 regarding the ERM website query should be revised as follows for clarity: "A query of the NYSDEC – Environmental Resource Mapper (ERM) website did not identify any additional listed wildlife species and did not identify any listed plant species or NYS "Species of Special Concern" on or near the property."
45. The text discussing the lack of protected plant and animal species expected on or around the site (currently on page 7-4) should also reference the field surveys that were conducted.
46. The USFWS website provided in Footnote 5 on page 7-4 no longer works and should be updated accordingly.
47. Page 7-5 states "If any protected tree is inadvertently damaged, it shall be repaired by an approved tree surgeon." This text should most likely state "by a certified arborist." AKRF is unfamiliar with the term "approved tree surgeon."
48. On Figure 7-1, the significant habitat types should not be clipped at the project site boundary. Per the scoping document, "Where the environmental features continue beyond site boundaries into neighboring properties, indicate this graphically."

## **CHAPTER 8: GEOLOGY**

49. The Introduction section states, "the proposed improvements would disturb approximately 46.5 acres of land, primarily within upland portions of the site." However, Chapter 7 on page 7-3 states the project "would directly disturb approximately 49 acres of trees from upland areas..." Chapter 8 on page 8-5 also states total disturbance would be 49 acres. Chapter 9 on page 9-5 states 46.5 acres of disturbance. Chapter 16 in Table 16-1 in the Proposed Plan and Natural Turf Alternative state 44.0 acres of disturbance. These numbers should be revised as needed for consistency.
50. In Footnote 1 on page 8-1, the publication date of the study "Bedrock Geology of Parts of Putnam and Westchester Counties, New York, and Fairfield County Connecticut" should be provided.

51. Under Section 8.2.1 Soils, the first paragraph and the slope table (currently Table 8-1) should be moved to Section 8.2.2 Topography.
52. The civil drawings should be included as an appendix, and they should either be replicated within the chapter or the references to the drawings in the text should refer to the appendix.
53. The soils text currently on pages 8-2 and 8-3 only cites Drawing SS-1. Figure 8-1 should be cited here as well.
54. Section 8.2.1 Soils should include a discussion of the depth to groundwater.
55. Section 8.2.3 Bedrock should discuss the locations of the sampling sites where auger refusal occurred as shallow as 6 inches below grade. Based on Appendix G, it appears that at least one of these sites is located within the area of proposed walkway between baseball fields. Section 8.4.3 Impact to Bedrock should then be updated accordingly, particularly the potential need for blasting. Page 8-5 under Section 8.4.1 also currently states no bedrock removal is proposed; this statement should be updated accordingly. If bedrock removal and/or blasting will be required, the bedrock removal and blasting statements in the Executive Summary and Chapters 14 and 15 should be updated.
56. Section 8.4.1 at the bottom of page 8-5 states “This system would be designed to meet the requirements of applicable local, Putnam County, New York City Department of Environmental Protection (NYCDEP), and NYSDEC ordinances and guidelines.” The examples provided do not include any Putnam County ordinances or guidelines, and no Putnam County approvals for the stormwater collection and conveyance system are listed in Chapter 1. If there is an applicable Putnam County ordinance or guideline, it should be included in the bullet list in Section 8.4.1. Otherwise, “Putnam County” should be removed from the sentence on page 8-5.
57. Section 8.4.1 on page 8-5 states the project would not involve the need to truck in any fill material. It should be clarified whether the synthetic turf includes synthetic material for the clay areas as well.
58. The text on the top of page 8-6 (Section 8.4.1) and the bottom of page 8-6 (Section 8.5) discussing Paxton soils lists PnD. The PnD soil type should be removed from the parentheses to eliminate potential confusion since this soil type is not present on the project site.
59. Section 8.4.2 should include a reference to and brief discussion of the proposed grading drawing OPG-1.
60. Section 8.4.2 Impact to Topography should also include a discussion of techniques proposed to minimize soil erosion and slope failure. At a minimum, Section 8.4.2 should cross-reference to discussion of this within Section 8.4.1.
61. Section 8.5 on page 8-6 mentions “NYSDEP.” This should be corrected to clarify whether this should have stated NYCDEP or NYSDEC.

## **CHAPTER 9: WATER RESOURCES AND WETLANDS**

62. Section 9.2 Existing Conditions – Water Resources states there are three small ponds on site and references Figure 9-1. It is not clear from Figure 9-1 which surface water features are considered as the three ponds mentioned. Furthermore, Chapter 11 states there are two ponds on the project site.
63. Section 9.3 Existing Conditions – Wetlands references Drawing No. WV-1 Wetland Validation Map on page 9-3. This drawing should be included in the drawings provided.
64. The discussion of wetland buffers in Section 9.3 on page 9-4 should reference Figure 9-2. In addition, this discussion should be expanded to include the percent cover of vegetation for each wetland buffer.
65. On the top of page 9-5, “clogging of the fills” should say “clogging of the gills.”

66. The text on page 9-5 indicates 4.6 acres of Town wetland buffer areas would be impacted. The acreage of impacts within NYSDEC wetland buffers and NYCDEP Watercourse Limiting Areas should also be provided. It may be helpful to overlay the project outline on Figure 9-2.
67. Section 9.5 Potential Impacts on page 9-6 states “approximately 22 acres of impervious surfaces would be created on the site...” However, the SWPPP in Appendix E indicates 10.7 acres of impervious surface.
68. Under Section 9.6 Mitigation Measures on page 9-8, it states “The construction stage of the Project will be phased to minimize soil exposure to be in accordance with the General Permit.” However, in Chapter 8 on page 8-7, the text notes “is possible that a waiver may be requested to allow defined areas of disturbance to exceed five (5) acres at one time.” Chapter 9 should be updated accordingly to note this potential waiver request and any impacts it could have on water resources.
69. The text on the bottom of page 9-8 and the top of page 9-9 that references project drawings should clarify which drawings are being referred to and these drawings should be included in the list of drawings provided.
70. The paragraph discussing soil restoration on page 9-9 would fit better in Chapter 8 Geology to supplement the information already on page 8-7.
71. There is some detail within Section 9.6 Mitigation Measures that is relevant to but not contained in Chapter 10 Stormwater. For any of this detail that remains in Section 9.6 but not in Chapter 10, a cross reference should be added within Chapter 10 to refer back to Chapter 9.

#### **CHAPTER 10: STORMWATER MANAGEMENT**

72. Page 10-1 should provide the 24-hour rainfall for the 25-year storm, which was included in Appendix E.
73. The text on page 10-4 that references goals 3 and 4 of the Design Manual should note what those goals entail.
74. The appendix letter is missing from the appendix cross reference in the first full paragraph on page 10-4.
75. The SWPPP in Appendix E documents on page 3 (PDF page 8) that the TR-20 method was used. However, the scoping document states the proposed project should be evaluated “using hydrologic modeling software based on the TR-20 and TR-55 methodology...”
76. Per the scoping document, the stormwater evaluation should “quantitatively describe the expected stormwater flows and peaks with the proposed project and related improvements for the 1-, 10-, 25-, and 100-year storm events.” The SWPPP in Appendix E only presents the 10-year, 25-year, and 100-year peak flows in Table 2.5.1; the 1-year peak flows should be added to this table. In addition, this information should also be presented directly in Chapter 10 so the reader does not have to refer to the Appendix to find the information.

#### **CHAPTER 11: TRAFFIC**

77. Consider adding a figure to Chapter 11 showing the studied intersections. Figure 1 in Appendix J in the low resolution PDF is hard to read, particularly for the Independent Way label.
78. On page 11-1, the text that reads “...representative of typical (per-COVID) conditions, traffic volumes recorded...” should be changed to “representative of typical (pre-COVID) conditions; therefore, traffic volumes recorded...”
79. Page 11-1 should note the escalation rate of 1.0% per year for obtaining 2021 volumes.
80. The weekday AM, weekday PM, and Saturday peak hour timeframes should be identified on page 11-1.

81. The accident data paragraph on page 11-2 should include a brief summary of the results, or at a minimum should cross-reference the discussion of results in Section 4 of Appendix J.
82. The tables included in Chapter 11 should be numbered and the text on page 11-2 that states “are shown in the Level of Service Summary Table at the end of this section” should be updated to refer to the table number.
83. In Section 11.3 Potential Impacts (Build Condition), as required by the scoping document, a brief discussion should be added to describe the proposed operations (i.e., practice sessions, open recreation, tournaments) for each of the components of the proposed project, including variations in facility uses by time of day, seasons, and special events.
84. Regarding the Parking subsection on page 11-5:
  - a. Further detail should be provided on how the proposed 449 parking spaces was determined.
  - b. This section should state the proposed number of bus parking spaces, whether that is included in or in addition to the 449 spaces, and whether that would be adequate for the maximum number of buses anticipated to be on site simultaneously.
  - c. Chapter 1 states that the parking lot may be used for public access parking for the Town-owned lots, which would include a hiking/fitness trail. This could potentially add to the parking demand.
85. The Parking subsection does not discuss loading spaces or loading requirements. It should be stated in the chapter whether loading spaces would be needed.
86. The turning movement diagram for the ambulance appears tight within the northern parking lot area. It should be confirmed that the ambulance will be able to turn around without interfering with the concession/restroom building and the adjacent parking spaces.
87. Additional technical comments on the TIS are pending.

## **CHAPTER 12: INFRASTRUCTURE AND ENERGY**

88. The introduction describes the indoor recreation facility as  $\pm 32,000$  square feet. This should be updated to  $\pm 35,000$  square feet for consistency with Chapter 1.
89. The patronage and employment projections between Chapter 1 and Chapter 11 should be consistent. Chapter 11 states that weekday peak season use would be no more than 360 patrons whereas Chapter 1 states 358. Chapter 11 states weekend peak season use would be up to 1,100 whereas Chapter 1 states 1,023. Chapter 11 states the project would employ up to 70 people during peak use whereas Chapter 1 and Chapter 4 state up to 63 people.
90. Section 12.1.2 on page 12-1 states there are two ponds on the project site; however, Chapter 9 describes the site as having three ponds.
91. Section 12.4.2 On-site Sanitary Wastewater Impacts should note the permits/approvals that will be required from NYSDEC and NYCDEP.

## **CHAPTER 13: AIR QUALITY**

92. The acronym typically used for Ambient Air Quality Standards is “AAQS” and for National Ambient Air Quality Standards is “NAAQS.” Consider changing “AAIS” to “AAQS” and “NASA” to “NAAQS” throughout the chapter.
93. Throughout the chapter, text discussing nitrogen dioxide uses either “NO<sub>y</sub>” or “NO.” This should be updated throughout to “NO<sub>2</sub>”.
94. In Table 13-1, footnotes 2 and 3 are not called within the table. The units should also be defined in the table notes.

95. There appear to be inconsistencies between the ozone air quality standards and footnotes on Tables 13.1-1 and 13.1-4. Please confirm whether it should be 0.08 PPM or 0.07 PPM.
96. Page 13-4 lists “total suspended particulates (PM<sub>2.5</sub>)” as one of the federal criteria pollutants monitored in the Hudson Valley Air Quality Control Region. This should be corrected to state “inhalable particulates (PM<sub>2.5</sub>).”
97. The first line below the bullet list on page 13-4 has a typo in the acronym for nitrogen dioxide.
98. The last sentence in the paragraph below the bullet list on page 13-4 states “Particulate standards include only those particles with diameters less than 10 microns which are inhalable.” This sentence is also stated on page 13-1, and it is unclear how it relates to the paragraph on page 13-4 regarding the Hudson Valley Air Quality Control Region, which monitors PM<sub>2.5</sub>.
99. Page 13-4 states there are two monitoring stations in Newburgh. However, Table 13.1-3 only lists one Newburgh station. The last row, “Rockland County,” is likely a typo and should have identified the second Newburgh station. Given that several of the stations were determined to be too far from the project site to be representative, Table 13.1-3 NYSDEC Air Quality Monitoring could either be shortened to only include the sites evaluated for the project or could potentially be deleted in its entirety. If the table is kept, the note that states “P = Monitoring Location for Pollutant” should be removed as it does not appear to correspond to information presented in this table.
100. The text at the top of page 13-5 implies that the Mt. Ninham air quality monitoring station is the closest station to the project site. Based on Table 13.1-3, the Mt. Ninham station monitors sulfur dioxide, inhalable particulates, and ozone. However, Table 13.1-4 presents ozone data from Valley Central and PM<sub>2.5</sub> data from Newburgh. It should be clarified why Valley Central and Newburgh data were used instead of Mt. Ninham data for these parameters.
101. The following corrections should be made on Table 13.1-4 Regional Air Quality Data Summary:
  - a. The notes should be renumbered to match the order in which they are called.
  - b. The units on the PM<sub>2.5</sub> row should be corrected to state “μg/m<sup>3</sup>” and the number for the corresponding note should be corrected (it currently references Note 1 instead of Note 3). In addition, this note should state “Annual Mean in micrograms per cubic meter (μg/m<sup>3</sup>).”
  - c. The Wallkill row lead data units should be corrected to state “μg/m<sup>3</sup>” and its corresponding note should also be corrected to state “μg/m<sup>3</sup>.”
102. The text below Table 13.1-4 discusses ozone data for the White Plains station. This is confusing as data for this station were not presented in Table 13.1-4. If data from this station are deemed relevant for this project, Table 13.1-4 should be updated accordingly. Furthermore, the text on the top of page 13-6 states “ozone levels meet air quality standards in the upper Hudson Valley and therefore are not a pollutant of concern for the area.”
103. The text on page 13-5 that discusses the proposed Brewster Yards project does not belong in the Existing Air Quality section and should be moved to Section 13.3 Potential Impacts.
104. The second paragraph on page 13-7 states three signalized intersections were evaluated as part of the traffic analysis. This text should be clarified to state that three signalized intersections were found to have a level of service D or E, since a fourth signalized intersection (NYS Route 312/Pugsley Road) was evaluated in Chapter 11.
105. On page 13-8 under the Fugitive Dust Controls subsection, “stored of stockpiled” should be changed to “stored or stockpiled.”
106. On page 13-9, under the “Soil stored or stockpiled” subsection, it should be clarified what is meant by “will be treated” at the end of the first bullet.



**CHAPTER 14: NOISE**

107. The second line on page 14-1 should read “it should be considered” instead of “and should be considered.”
108. The Future Without the Proposed Project section should discuss the anticipated increase in ambient sound levels from the Northeast Interstate Logistics Center.
109. If Chapter 8 is revised to state the blasting could be required, Chapter 14 should be updated to discuss blasting noise impacts.
110. The Long-Term Noise Effects section on page 14-7 discusses anticipated noise sources from the proposed project. It does not list noise from batting, which presumably could also be a considerable source, particularly from the batting cages. This section discusses noise levels from soccer and basketball games, but it seems likely that these two sports would not be as noisy as baseball. If noise levels from other baseball facilities are available, that should also be discussed.
111. The timeframes during which grading and excavation is allowable should be corrected in Section 14.4. Per Chapter 69 of the Town of Southeast code, grading and excavation activities are to be conducted between 7 AM and 5 PM on weekdays and between 7 AM and 1 PM on Saturdays.
112. Per the scoping document, Chapter 14 should include a qualitative assessment of cumulative impacts on noise accounting for activities at the Commercial Campus at Fields Corner site and the Tilly Foster Farm. The chapter does not currently discuss noise from either of these other locations.

**CHAPTER 15: CONSTRUCTION IMPACTS**

113. The text on page 15-1 regarding tree clearing should indicate clearing would only be done during November through March, consistent with the NYSDEC guidelines and the text in Chapter 7.
114. The preliminary sequence of construction events outlined on page 15-1 is repetitive with the information provided in Figure 15-1. Consider removing the list on page 15-1 and briefly summarizing the sequence with a cross reference to Figure 15-1. This figure is not currently called in the text.
115. The discussion of air quality on page 15-2 should cross reference the fugitive dust discussion in Section 13.4 of Chapter 13.

**CHAPTER 16: ALTERNATIVES**

116. Footnote 1 is called in the first sentence on page 16-1 and again on page 16-2, while the footnote text only appears on the bottom of page 16-2. This should be adjusted so the footnote appears on the bottom of page 16-1, and the call to footnote 1 on page 16-2 should be renumbered and use “Ibid” in the footnote text.
117. The following should be added to the discussion regarding the “Larger Building Alternative”:
  - a. A discussion of expected changes to the line-of-sight profiles evaluated for the proposed project.
  - b. Whether a variance would be needed from the required 55% open space for proposed Lot 10. Drawing OP-1 indicates the proposed project layout only provides 55% open space for proposed Lot 10.
118. The following items should be checked in Table 16-1:
  - a. The building coverage and pavement areas for the Proposed Plan are not consistent with Table 1-1 from Chapter 1. The numbers throughout the Proposed Plan column in Table 16-1 should be verified and corrected as necessary. The building coverage and pavement areas for the Natural Turf Alternative should be corrected as well, since they match the Proposed Plan column.

- b. The total disturbance for the Proposed Plan and the Natural Turf Alternative is listed as 44.0 acres. This is not consistent with disturbance acreages presented in other chapters, as noted in the comment above in the Geology chapter.
  - c. The steep slope row is labeled as >15% slopes but should be labeled as  $\geq 25\%$ . The 1.1 acres presented for the Proposed Plan (and the Natural Turf Alternative) correspond to the acreage with slopes  $\geq 25\%$  according to Table 8-1 in Chapter 8. It should be confirmed whether the steep slope acreage provided for the Alternative Project Scale and Siting column is in fact for slopes  $\geq 25\%$ .
  - d. The tree clearing acreage listed for the Proposed Plan (and Natural Turf Alternative) is 44.0 acres. However, Chapter 9 states there will be 49 acres of tree disturbance.
  - e. It is not clear whether the Alternative Project Scale and Siting column is specific to the Larger Building Alternative evaluated within the text, or whether it is meant as an overall range that would represent potential impacts of Concept Sketch 1, Concept Sketch 4, and the Larger Building Alternative. The weekend peak trip generation is listed as 483-531, representing a potential increase in traffic impacts compared to the 483 trips of the Proposed Plan. However, the text states that the Larger Building Alternative would not change the projected trip generation and effects on traffic.
119. Figure 16-1 shows three multi-sport fields, consistent with the text on page 16-2, but the text included on Figure 16-1 states two multi-sport fields.

#### **CHAPTER 17: MITIGATION SUMMARY**

120. The summary of mitigation measures could be revised to more specifically address those measures that would mitigate identified impacts. If no significant adverse impact was identified, it would be appropriate to state no mitigation measures are proposed, as was done for the cultural resources section. For example:
- a. The bullets that address consistency with public policy documents are should not be listed as a mitigation measure (see comment on Chapter 2 Land Use, Zoning & Public Policy above).

#### **CHAPTER 18: OTHER EFFECTS**

##### *UNAVOIDABLE ADVERSE IMPACTS*

No comments on this section.

##### *IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES*

No comments on this section.

##### *GROWTH INDUCING AND CUMULATIVE IMPACTS*

121. A brief discussion of cumulative impacts should be added, considering at a minimum the Northeast Interstate Logistics Center.

##### *EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES*

No comments on this section.