

Nov. 18, 2018

TO: Dryden Town Board

FR: Charles Geisler, Dryden Resident

RE: **Comments to Town Board / Trinitas Ventures Concerns**

At your Oct. 15/18 Town Board meeting I shared concerns with the proposed Trinitas Ventures development for the Hamlet of Varna. My chief concern was as follows: despite verbal assurances from Trinitas that they will install heat pumps, you are taking this on faith. It is unwise not to have this in writing. Other cities have rejected Trinitas' student housing proposals (Oxford, OH, in 2014; Ames, IA, in 2017 and Ann Arbor, MI, in 2018) despite environmental concessions by Trinitas. If you have the least reason to doubt that Trinitas will keep its word regarding heat pumps, now is the time to insist on this while you have maximum leverage.

Some of you asked that I share information I had gathered, which I offer here.

Green Features in Trinitas Projects

In 2015 Oxford, Ohio (Miami University), rejected a 643-bed development proposal by Trinitas. The concerns were noise, traffic, use of green space, and family versus rental properties. Trinitas sued the city and the project has gone forward (<https://patch.com/ohio/miamiuniversity-oxford/construction-well-underway-annex-oxfords-newest-housing-option>) as student rental housing. The Ames City Council vetoed Trinitas' 800-bedroom proposal over concerns with traffic, flooding, scale, and zoning conformity (<http://www.amestrib.com/news/20170517/ames-pz-splits-vote-on-trinitas-development-in-west-ames>). The Ann Arbor City Council echoed similar concerns over Trinitas' 710-bed proposal in their community, but put additional emphasis on "disturbance to natural features" and land use (https://www.mlive.com/news/ann-arbor/index.ssf/2018/09/ann_arbor_rejects_controversia.html). In this last case, Trinitas offered to reduce the size of its proposal and listed multiple "green/sustainable initiatives," including energy-efficient building features and construction methods, as well as shuttle-bus services to reduce car traffic. The final vote against Trinitas in Ann Arbor remained 10-0.

Steadfast Student-Housing Orientation

Trinitas is bullish on student rather than family housing, whereas the Varna Community Development Plan emphasizes reverses this order. As Trinitas states:

"Since 1978, Trinitas has been a premier owner, developer, builder and manager of high quality commercial real estate and student housing communities. We are experts in a highly specialized

niche that requires an experienced team who understands the nuances of the industry. Our team includes accomplished veterans of commercial real estate and student housing.... Trinitas currently owns and manages nearly one half billion dollars in student housing assets consisting of more than 6,200 beds. In the last year, we have financed more than \$100 million in student housing and are currently developing over \$150 million in assets.

(<https://greenstarjobs.com/general-manager-jobs/denver-co/j729700>)

[My comments did not restate the obvious: greater Ithaca is experiencing a boom in student housing (Maplewood Apartments, Eddygate Apartments, Collegetown Terrace Apartments, State St. Triangle, College Townhouse, Lux North and South, 802 and 902 Dryden Rd., Cayuga Place, etc.) and is awaiting yet more supply (e.g., Seneca Flats and Cornell's NCRE).]

Heat Pumps & Your Present Leverage

I stressed that you have maximum leverage now over heating choices within the Trinitas development. First, in response to the September Sketch Conditions letter, Trinitas wrote to Ray Burger to assure him that considerable effort had been put into site design. These are (1) a 60% project dedication to green space; (2) an open access community garden; (3) public trail access and parking along the Varna Trail; (4) a pocket playground; and (5) "proposed dedication of land across Route 366 for a future park adjacent to Fall Creek." (see attached letter from Trinitas' Kimberly Hansen). These are welcome amenities and signal that Trinitas is listening. But, compared to project GHG emissions that advance climate change, they are side-dishes. The main course is the project's heat source in a town known and respected for its clear stance on natural gas dependency. You have every reason to call this question now, before project approval, and harden Trinitas' verbal commitment to heat pumps into written form. (And imagine, if Trinitas Ventures does this, heat pump logic could ripple through their future projects across the country.)

Second, there is a rub between the bedroom cap in the Varna Community Development Plan (roughly 500) and what Trinitas now proposes to build (552). No, the latter number is not "in the ball park." The Town has already approved nearly 200 new rentals bedrooms in Varna, reducing what's available under the Plan to roughly 300. I'm confident that Trinitas will trade written heat pump guarantees for Town Board permission to build more than 300 new bedrooms. You have the advantage here. And you don't need egg on your face in the event they don't honor their word. Moreover, it's hard for Trinitas to sue the town for acting within its charge.

I have not mentioned a building moratorium in Varna. That is because I wish to see housing consistent with the Varna Community Development Plan go forward with an enlightened main course as well as the side courses under discussion.

If possible, please add this written version of my comments to the November Town Board minutes. Thank you.

Conservation Board:

Comments on the **Trinitas Full Environmental Assessment Form Part 1** dated 10/25/2018

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D.1.h.ii. If a water impoundment, the principal source of the water:

They only mention runoff from the site, not the current stream. The year-round stream, flows from higher ground through a culvert under the rail bed. It's the main source of water into their impoundment. The impoundment would not seem to have the capacity to handle stream water and site runoff. How will their storm water management plan incorporate the stream?

D.2.a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both?

Construction on the steep slope likely will require significant excavation and alteration of the site. The next questions should be answered.

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D.2.b.iii. Will proposed action cause or result in disturbance to bottom sediments?

Where would the mentioned culverts be installed?

D.2.b.iv. Will proposed action cause or result in the destruction or removal of aquatic vegetation?

David W: Since it is indicated that the entire wetland will be disturbed and replaced by 0.9 acres of aquatic vegetation, essentially a new wetland, a detailed description of how this new wetland will be constructed and maintained must be provided to see if it will be done correctly.

D.2.b.v. Describe any proposed reclamation/mitigation following disturbance:

David W: Given a wetland reconstruction is required, a much more detailed explanation of how this will be done needs to be included. It is insufficient to just say, "site will be seeded and stabilized with the appropriate mix."

Jeanne Grace: I would also like to add a comment regarding the "creation of wetland". I am curious to know how 2 storm water retention ponds can be considered alternate wetland. Salt laden run off filling retention pond does not provide nearly the same ecological services as the existing a wide shallow wetland area. Maybe this is technically allowed but I don't see how the two are equivalent.

D.2.d.iii. Will the proposed action use any existing public wastewater treatment facilities? Does the existing wastewater treatment plant have capacity to serve the project?

The Varna sewer district may not have the allowed capacity to handle the new volume.

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D.2.e.i. How much impervious surface will the project create in relation to total size of project parcel?

Total of impervious surface of 7.9 acres is too high. Max should be 6.5 acres, per Town Zoning.

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D.2.j. Will the proposed action result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services?

Traffic levels should be yes. Left turns into busy traffic on Route 366 will be a huge problem. Requiring only right turns on Mt. Pleasant Road will still require much of that same traffic to turn left onto Rt. 366 at Game Farm Road.

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D.2.n.i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures:

Proposed LED lighting color? Yellow bands of color are best.

D.2.n.ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen?

Do not believe just minimal tree removal required, because there are many trees on the site.

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E.2.a. What is the average depth to bedrock on the project site?

How do they know bedrock is greater than 25' deep? May present a problem on the steep slopes.

E.2.d. What is the average depth to the water table on the project site?

How do they know the water table is greater than 25' deep?

E.2.h.i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)?

Should be yes, as there are wetlands.

E.2.h.iv. For each identified regulated wetland and waterbody on the project site, provide the following information:

Indicates no streams (mislabeled as wetland).

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E.2.o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species?

Should have a reference provided to show NYSDEC's evaluation results.

To Dryden Planning Board Members
Re: Trinitas Review
Fr: Jim Skaley

6 December 2018

I have reviewed most if not all the most relevant materials submitted by Trinitas to date and my conclusion is that Trinitas HAS NOT MET THE STATED CONDITIONS FOR APPROVAL OF THE SKETCH PLAN (See attached Notes) and in addition on reviewing Parts 1, 2, and 3 of the FEAF there is evidence that additional information is required and that there are at least 10 major or moderate impacts that would occur in the SEQR review. That by itself should compel the Town Board to require that Trinitas complete a full Environmental Impact Statement (EIS).

If a full EIS is required, the Town Board should hire an outside independent engineering/consultant firm to evaluate the EIS at Trinitas' expense. This would be consistent with what occurred in the Varna II project proposed by Steve Lucente in or around 2000. That project required a full EIS and was evaluated by a Syracuse firm which found the EIS lacking.

Trinitas has requested a variance from the parking requirements providing only 428 parking spots for 552 potential residents when the demographic that they have in their marketing plan is for college age and young professionals. A large number of Cornell students living near campus have cars and most young professions employed would have cars also, I would strongly urge that the Town find that this request be denied. In addition, there aren't any amenities close by such as bars and restaurants in and around the Varna community that would be attractive for this demographic and would likely mean that they would have to travel likely by car to downtown Ithaca adding traffic at night and on weekends.

Other concerns relate to the calculation of the required green space and the request for additional density based on Redevelopment. The area cited for redevelopment in the Varna Plan is except for one parcel not included in the Sketch Plan. Therefore for most of the site this is new development and would not qualify for bonus density.

The Trinitas project fails to provide necessary affordable housing and would only add to the current mix of luxury apartments in the area. It also would increase to 90% or so the amount of rental units in the Varna community thereby impacting the permanent residents and likely promoting an unstable social environment. Varna and Tompkins County are critically short of affordable housing—This project fails to support that need.

My recommendation is that the Town Board should deny approval of the Sketch Plan given that after three iterations Trinitas still has failed to fully comply with all the conditions required by the Town Board and for the reasons stated in the attached Notes.

Respectfully submitted,

James Skaley

12/6 Notes on SEQR review and other related items as/per sketch and site plan review conditions

Ground Disturbance:

item 2—states 100' fr any stream/pond or wetland==there is a wetland and stream that runs through the site— not sure this statement is correct?

4. slopes include 15%+ This may require certain stabilization features where proposed structures are sited near the top of slopes. There doesn't appear to be discussion that I found to control water during storm events to run down the driveway from the top of the site to 366.

5/6. excavation/fill—A considerable amount of excavation and fill will be required as stated in the PSI geotechnical report—in addition some undetermined amount of fill, cobble and construction materials will need to be addressed and likely removed

8. amount of impervious surfaces: Will increase substantially

9. Total impervious surfaces: 102,060 driveway, building; 87,359; parking: 80 316 total=269,725 sq ft —6.1923 ac vs. current .35 ac or 17.7 times more impervious surfaces much on or adjacent to steep slopes

Total disturbance— 15.46 ac-Initially most of the existing vegetation and mature trees will need to be removed to provide for the needed site grading and excavation.

11. Trinitas is asking redevelopment credits but states that it doesn't fit the DEC design manual for redevelopment

Rev. SEQR Part 1—dated 10-25-18

Description; incl—2200 sq ft retail and 428 parking spaces over all= for 552 units total impervious surface listed p. 6 =7.9ac parcel size= 16.7 ac 47% however spaces created by demolishing existing structures and dedicating for green space some to be dedicated to the town.

C2-indicates that the plan specific recommendations for the site—although they don't reference those conditions as stated on p. 70 of the Plan

C4-fire protection—list Dryden not Varna Fire Co.

D1-e—total project time 17 mo.

D1-f —lists 219 multiple family structures —building ht—40' 30x72'=2200 sq ft

d1-h-impoundment—2 million gal=.8ac

D2—dredging—marked no—but the pond will likely need to be dredged to accommodate the vol. of water—??? inspection says its currently shallow and filled with a lot of veg.==wetland impacted is est. .5 ac—looks like the the wetland will largely be totally reconstructed or removed.

water demand—stated 47,250 gal/da===ave usage person/da is 80-100 gal. for this project= 44,160—55,200 gal. da.

D2g—while not in a air quality non-attainment area—there is no listing of cCO2 emissions which no counters the county's goal of reducing Co2 emissions.

D2h—states no emissions from methane—but doesn't state the heating source

D2j—states no increase in traffic based on 424 parking spaces—currently 10 times the present number of spaces. v- access to 366 fr Mt Pleasant restricted to rt turn only—how enforced? or do they mean only from the site? If onto 366 how would this impact other area residents who choose to access 366 heading in other directions?

D2k—states no additional demand for energy—??? doesn't indicate energy source

D2 m/n-states tree removal but minimizes the impact—while from the site plan it would need to remove nearly all existing vegetation including many mature trees.

D2r-marked No—assume that there will be both construction material waste and after built trash and vegetable waste no estimates given indicated that this is a residential project however the scale is way beyond any existing residential project and would be equivalent to a commercial enterprise.???

E1 b—lists grass/meadow reduction of 6.95 ac out of 14.9==but I believe they must be counting the areas on the north side of the road given that they are using that for green space --can't have it both ways—

E1e indicate impoundment of 1.6m gal while the required runoff is 2 million gal—See D1h where does the additional 400,000 gal go?

E1e ii/iii currently listed as low hazard—however, with the heavy amount of vegetation/trees on the site-there undoubtedly is a large uptake of current runoff by veg. after the removal this will no longer be the case—

Ef marked No but there has been extensive fill on this site some construction fill but anecdotal accounts suggest other fill concerns.

E2f about 1/3 (35%) of the construction site will be on slopes 10% to 15% or greater

E3i part of Fall Creek is designated as a recreational river—but don't know if this portion is included?? need to check.

SKETCH PLAN CONDITIONS

1. Include specific details of how the Site Plan complies with the Varna Community Development Plan adopted December 2012.

Response: It appears that Trinitas cherry-picked a couple of sentences out of context in their reply—failing to even address what the Final Master Plan calls for. In the following I used DEC's SEQR workbook questions (small font) to address the failings in this proposal: Kimberly Hansen replied in a letter Oct 23, 2018—cited two pages (19 & 20- actually the quote is on p. 18 regarding Varna II site) from Part I in the Varna Community Development Plan—stating these areas are undeveloped and also may be when developed cater to “family and students” and p. 27—describing the graphic “. . .units could be for young professionals, students, or designed to help with the demand for

senior housing.” The Varna Hollow graphic refers to the area near 366 and does not include what is called “Trail Side” which is the 12.67 ac parcel where most of the proposed development would go. Unfortunately, for Trinitas, recent information provided by the County suggests that rental housing demand has peaked especially for 3 and 4 bedroom units and that with Cornell rapidly expanding their housing for students and proposals for increasing housing for staff, and with the increasing need for affordable housing this project is out of sink with current reality and needs of the community.

The following notes relate to questions from the DEC FEAF workbook regarding impacts: Consistency with Community Plans poses the following questions: How do the vision and goals described in these plans compare with various elements of the proposed project? Do any elements of the proposed project conflict the vision, goals, and strategies outlined in any of these adopted plans?

This is a **MODERATE TO LARGE IMPACT**: There are three goals cited in the Plan: 1) Protect and Enhance the hamlet character, 2) Develop a transportation system that is balanced, safe and equitable for pedestrians, cyclists, and motorists and 3) Protect and improve the quality of the life in the hamlet. Hansen and Trinitas have not referenced any of these goals: Much of the Plan discusses moving away from conventional zoning to character and form based zoning where projects are to be reviewed based on bulk and character related to and in harmony with the overall community character (obj. goal 1)- Trinitas’s 219 townhouse development essentially squeezed onto 5 parcels is at a much higher density and out of character—Trinitas cites 902 Dryden Rd as an example which is on a much smaller scale—and arguably doesn’t conform either. While the zoning based on structures/ac as adopted allows for this higher density—that zoning fails to comply with the stated objectives in the Plan. The Plan distributes population based on number of bedrooms (see P. 70)—therein lies a conflict between two legal documents. The NYS Court of Appeals in Udall v Haas states that zoning must be consistent with the comprehensive plan. Objectives under goal3 suggests defining limits of development relative to traffic, bulk and density of buildings. This project will increase traffic, has bulk and density that far exceeds the proposed average density of 4 units/ac as cited in the hamlet plan and the Town Comp Plan for hamlets.

Trinitas fails to cite Part 4 of the Varna Plan which is the proposed Final Master Plan and which also distributes growth in a rational manner according to population (number of bedrooms) in different character areas of the hamlet. That way development is better integrated into the existing fabric of the community. The build-out p.70 shows an overall

total growth of 454 bedrooms. For the Trail-side site where most of the townhouse units are proposed indicates predominately reserved for single family units with a few townhouses (95 single family and 4 townhouse units or totally 171 bedrooms. Trinitas is totally out of scale and fails to provide any individual single family units—or any for home ownership as stated as one of the concerns and desired objective in the Plan.

b. The proposed action will cause the permanent population of the city, town or village in which the project is located to grow by more than 5%.

Mod/Large= • A proposed project that results in a population growth that exceeds 5% of the current municipal population. • A proposed project that results in any population growth that would result in the expansion or creation of new infrastructure, housing, services, or other municipal capacity to accommodate that level of growth.

Moderate/Large Impact: Trinitas' project would greatly exceed the 5% growth over the current population in the hamlet essentially nearly doubling the population over night. and only suggests a modest contribution to the community in terms of amenities such as a coffee shop, community garden and possibly pocket park.

The Plan states: “. . .it is essential to establish development controls that allow growth to occur in such a way where building footprints, new uses and amenities fit into the existing fabric of Varna” p.31; and “home ownership” is one of the issues identified to enhance quality of life in the hamlet.p. 60.

The proposed action may induce secondary development impacts (e.g., residential or commercial development not included in the proposed action)

A moderate to large impact could occur if the proposed project induces growth at a level that requires additional infrastructure, community services, or if it would be at a density or type of land uses that changes the community character.

The Proposal will create a density and type of land use that permanently changes the community character and will likely demand a much greater need for fire, police and traffic control that currently is only provided at a modest level. This would likely result in a **moderate to large impact**

The proposed project moderately or significantly changes the visual character of the area. • The proposed project is of a larger scale than currently exists in the area. • New building design, lot layout, street scapes, or intensity of use is in sharp contrast to that which exists. • The project introduces a land use that is inconsistent or in sharp contrast with surrounding land uses. • The project introduces odors, lights, noise, or traffic to an area in a way that is different than currently exists.

moderate to large impact: This proposal is glaringly in sharp contrast with any kind of development in the Hamlet or anything else proposed even in the Town of Dryden. The bulk and character of the townhouses is suggestive of developments that may occur in or near large metropolitan areas. The proposal further deviates from the residential design standards referenced in the Plan where units that emphasizes the use of Traditional Neighborhood Design (TDN) elements—a variety of single-family houses, townhouses, and duplexes to create quaint neighborhoods that fit into the landscape.p, 69;

further there should be a variety of setbacks to keep the landscape aesthetically interesting and consistent with historic lot patterns; buildings should be of human scale. Trinitas's townhouses are all several units attached in a linear fashion with no variety in terms of setbacks. They remind one of "row houses" that are often seen in public housing or older central cities. This contrasts with the Plan where there should be maintained a sense of openness in the hamlet. Currently there are no 3 and 4 story units in the hamlet and no other structures are consistently 40 feet in elevation as depicted in Trinitas's plan drawings.

c. The proposed action may displace affordable or low-income housing in an area where there is a shortage of such housing. **Mod/Large if** • The proposed project will result in a decrease in the number of affordable housing units where the availability of such housing is limited and not expected to meet demand.

Moderate/Large Impact: Trinitas proposes to demolish five small apartment units, a mobile home and two single family units in order to acquire part of the building site for townhouses and allow for the amount of green space required under the zoning. This will displace about a dozen moderate to low income families without providing any new affordable housing for these families. Tompkins County's housing study indicates that there is a critical shortage of affordable housing.

e. The proposed action is inconsistent with the predominant architectural scale and character. **Mod/Large** • The proposed project introduces an architectural style that is in sharp contrast in its size, window or door size and style, building materials, roof pitch, façade, color, or signage with existing or surrounding buildings.

See Design and Appearance Standards in Plan Appendix.

The current character of residences include front porches, a variety of door and window designs. The townhouses are consistently similar and have a massively bulkiness character with up to 14 separate units attached together in a linear design and with a consistent and boring repetition of door and window features. **Moderate/Large Impact**

f. Proposed action is inconsistent with the character of the existing natural landscape. **Mod/Large** • Significant portions (in size and in importance to the community) of the natural landscape are removed or changed, such as through blasting, grading, filling, or removal of predominant vegetation growing in the area.

Moderate to Potentially Large Impact: The proposal is to remove vegetation and disturb 15.46 ac of the 16.7 ac parcel—essentially removing nearly all the mature trees and other vegetation. This will significantly alter the present character of the site. The proposal is largely sited along the new pedestrian trail. Its likely that these Townhouses will be easily visible for walkers and cyclists in what other wise would be a trail that traverses nearly all naturally wooded areas. In addition to visual impact there are likely to be added noise from the development audible to hikers.

2. Provide profiles of the proposed parking garage that includes a description of the finish materials. **Provided.**
3. Show typical internal building floor plans for all proposed unit types. **Provided.**

4. Address items in Zoning Law Section 1103 including but not limited to:
 - a. Install sidewalks along Dryden Road and Mt. Pleasant Road. **Not evident on the plans but stated in correspondence. In addition there is little in the way of a landscape design.**
 - Bus stop along Dryden Road with a bus shelter. **Don't appear on the plans that I saw—believe may still be in discussion with TCAT**
 - Concept Designs of Proposed Entrance signs. **Provided**
 - Clearing and landscaping plans. **Some concepts but doesn't look complete would need much more detail.**
 - Proposal for single family homes and a pocket park on the north side of Dryden Road. **Punts—will not build but will dedicate parcels on the north side to the Town for development—these are however listed as part of the green space commitments to meet the zoning requirements—so doing so would seem to mean that they no longer meet the green space requirements.**
 - Designate placement of future carshare and EV charging stations. **Will provide three EV charging stations at or near the clubhouse**
 - A minimum of five parking spaces designated for trail use and information kiosk near the rail trail entrance at Mt. Pleasant Road. **Provided**
 - Trails connecting to the community garden. **Claims topography doesn't permit. So this raises the question of for whom is this community garden and who will maintain it and is it really desired or needed by the community (flower garden? or vegetable garden?)—Not answered**
 - Details of traffic control features at Mount Pleasant Road and Dryden Road exits.
 - Designate replacement parking location and commercial parking location.
 - 552-bedroom limit. Cap 4-bedroom units at 60 units. **Stated in compliance on new plans**

- **Green space—they claim having 60% total green space, but that counts a number of features like sidewalks running from 366 to the adjacent trail. This is subject to debate especially since sidewalks are actually contributing to impervious surfaces—definitional issues**

RESPONSES TO TG MILLER:

Will proposed action use or create a new demand for water—As of Oct 25 awaiting detail from Bolton Pt.

Will proposed action generate liquid wastes—TG Miller has been asked to evaluate the Varna pump station—Planning has agreed as of Sep 13 2018 that Trinitas may use a lower level of 76 g/da than normal for apartment units 110 g/da based on TG Miller's statement that they have observed this lower level in one apartment complex—No data presented to confirm. This would mean that Trinitas usage of the sewer lines would in theory stay within current capacity. However, it would still use nearly all the remaining capacity possibly limiting other types of development. There is considerable debate about the use of these numbers. Furthermore, the current sewer and water lines are old and likely leaking and have also experienced several breaks in recent years. At present the Town has not indicated when such lines are do to be replaced and whether the costs will be borne by the current property owners. No mention of any performance bonds to have Trinitas pay for any needed capacity or assist with new water/sewer mains.

Energy demand: Trinitas has implied that they will only use electricity for the units but are awaiting data from NYSEG as to how this will affect NYSEG's ability to service the site. No confirmation whether they would install heat pumps or are they planning on baseboard heat—

Incomplete Information

Traffic: The traffic study submitted doesn't seem to cover all possible connections. Since the study was done Trinitas has revised the plan to divert some traffic up the hill on Mt Pleasant to Turkey Hill Rd. The intersection with Turkey Hill was not included in the study Also they performed a 4 hour sample version on May 3, 2018 from 7-8:45 a.m. and 4-5:45 p.m. The CU shift hits Dryden Rd about 3 p.m. and is not included but does add a fair amount of added traffic. I feel this statistically a single sample and insufficient to evaluate the entire traffic flow through the Hamlet.—Its not conclusive that there will be a traffic light at the intersection with 366. The total traffic count listed for Dryden Rd is DOT data from 2013—which is likely out of date.

Hydrology/Drainage: Drainage maps are provided however, I was unable to determine how from the SWPPP how water would be diverted to the underground vault and the

constructed pond off of Mt Pleasant. The volume of water was estimated based on some generalized tables. There is no mention of impacts of climate change which according to CU Tompkins Co. has experienced a substantial increase in moisture in the past couple decades and the prediction is that our climate will continue to get wetter. Related to that the PSI geotechnical report boring data shows that between 10 and 20 feet there are silty sands which show evidence of moisture. These soils can probably transport infiltrated water from both above the site and any infiltration that the SWPPP plan projects and suggests that sites at the bottom of the hill may be impacted. PSI has determined that their borings are preliminary data and they raise several caveats that would require additional borings and excavation of existing fill matter to properly determine necessary compaction of soils on the site needed to support the proposed structures. The Varna Church which is located immediately below project site has both in the past prior to the site becoming heavily vegetated experienced frequent flooding in their basement after rain events and ponding in their parking lot. This remains true today as described in the following email from a church member despite costing the church a considerable sum to try to alleviate the damage:

Correspondance from Susan Simmons church member:

“The topography of the area is such that the Church/Parsonage parking lot (and basements) are the lowest lying areas within proximity of the proposed development. So that means at least in the Spring and Fall we get huge ponds of water in the parking lot and parsonage lawn. Despite the maturity of vegetation and old growth trees, the problem hasn't gone away. Trinitas' development will only increase the problem. That said, every time there is heavy or sustained periods of rain the parking area floods. The basements of the buildings have not flooded since the Church spent over \$20,000 in May of 2014 to install Sump Pumps with Battery Backups, Baseboard Drainage and a Drainage Chamber outside the door leading to basement. Water flows down through grate into a pit that we had dug lower than the drainage system so that water would leak out and not in.”

Another property owner Art Lecoq who lives adjacent to the outflow stream coming from the dam site and which traverses his property at 935 Dryden Rd has in the past experienced significant damage as a result of flooding and spent about \$7,000 to re channel the stream to contain the flow—a letter describing his experience is available and may be in the Town records in relation to the Varna II project several years ago.

A more complete hydrology study should be required to assure that adjacent properties will not be impacted as a result of the additional infiltration and on-site storage.

Full Environmental Assessment Form
Part 2 - Identification of Potential Project Impacts

Project :

Date :

Part 2 is to be completed by the lead agency. Part 2 is designed to help the lead agency inventory all potential resources that could be affected by a proposed project or action. We recognize that the lead agency’s reviewer(s) will not necessarily be environmental professionals. So, the questions are designed to walk a reviewer through the assessment process by providing a series of questions that can be answered using the information found in Part 1. To further assist the lead agency in completing Part 2, the form identifies the most relevant questions in Part 1 that will provide the information needed to answer the Part 2 question. When Part 2 is completed, the lead agency will have identified the relevant environmental areas that may be impacted by the proposed activity.

If the lead agency is a state agency **and** the action is in any Coastal Area, complete the Coastal Assessment Form before proceeding with this assessment.

Tips for completing Part 2:

- Review all of the information provided in Part 1.
- Review any application, maps, supporting materials and the Full EAF Workbook.
- Answer each of the 18 questions in Part 2.
- If you answer “**Yes**” to a numbered question, please complete all the questions that follow in that section.
- If you answer “**No**” to a numbered question, move on to the next numbered question.
- Check appropriate column to indicate the anticipated size of the impact.
- Proposed projects that would exceed a numeric threshold contained in a question should result in the reviewing agency checking the box “Moderate to large impact may occur.”
- The reviewer is not expected to be an expert in environmental analysis.
- If you are not sure or undecided about the size of an impact, it may help to review the sub-questions for the general question and consult the workbook.
- When answering a question consider all components of the proposed activity, that is, the “whole action”.
- Consider the possibility for long-term and cumulative impacts as well as direct impacts.
- Answer the question in a reasonable manner considering the scale and context of the project.

1. Impact on Land			
Proposed action may involve construction on, or physical alteration of, the land surface of the proposed site. (See Part 1. D.1)		<input type="checkbox"/> NO	<input type="checkbox"/> YES
<i>If “Yes”, answer questions a - j. If “No”, move on to Section 2.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may involve construction on land where depth to water table is less than 3 feet.	E2d	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may involve construction on slopes of 15% or greater.	E2f	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may involve construction on land where bedrock is exposed, or generally within 5 feet of existing ground surface.	E2a	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may involve the excavation and removal of more than 1,000 tons of natural material.	D2a	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may involve construction that continues for more than one year or in multiple phases.	D1e	<input type="checkbox"/>	<input type="checkbox"/>
f. The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal (including from treatment by herbicides).	D2e, D2q	<input type="checkbox"/>	<input type="checkbox"/>
g. The proposed action is, or may be, located within a Coastal Erosion hazard area.	B1i	<input type="checkbox"/>	<input type="checkbox"/>
h. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

2. Impact on Geological Features The proposed action may result in the modification or destruction of, or inhibit access to, any unique or unusual land forms on the site (e.g., cliffs, dunes, minerals, fossils, caves). (See Part 1. E.2.g) <input type="checkbox"/> NO <input type="checkbox"/> YES <i>If "Yes", answer questions a - c. If "No", move on to Section 3.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Identify the specific land form(s) attached: _____ _____	E2g	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may affect or is adjacent to a geological feature listed as a registered National Natural Landmark. Specific feature: _____	E3c	<input type="checkbox"/>	<input type="checkbox"/>
c. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

3. Impacts on Surface Water The proposed action may affect one or more wetlands or other surface water bodies (e.g., streams, rivers, ponds or lakes). (See Part 1. D.2, E.2.h) <input type="checkbox"/> NO <input type="checkbox"/> YES <i>If "Yes", answer questions a - l. If "No", move on to Section 4.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may create a new water body.	D2b, D1h	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in an increase or decrease of over 10% or more than a 10 acre increase or decrease in the surface area of any body of water.	D2b	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may involve dredging more than 100 cubic yards of material from a wetland or water body.	D2a	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body.	E2h	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may create turbidity in a waterbody, either from upland erosion, runoff or by disturbing bottom sediments.	D2a, D2h	<input type="checkbox"/>	<input type="checkbox"/>
f. The proposed action may include construction of one or more intake(s) for withdrawal of water from surface water.	D2c	<input type="checkbox"/>	<input type="checkbox"/>
g. The proposed action may include construction of one or more outfall(s) for discharge of wastewater to surface water(s).	D2d	<input type="checkbox"/>	<input type="checkbox"/>
h. The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.	D2e	<input type="checkbox"/>	<input type="checkbox"/>
i. The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.	E2h	<input type="checkbox"/>	<input type="checkbox"/>
j. The proposed action may involve the application of pesticides or herbicides in or around any water body.	D2q, E2h	<input type="checkbox"/>	<input type="checkbox"/>
k. The proposed action may require the construction of new, or expansion of existing, wastewater treatment facilities.	D1a, D2d	<input type="checkbox"/>	<input type="checkbox"/>

I. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>
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4. Impact on groundwater
 The proposed action may result in new or additional use of ground water, or may have the potential to introduce contaminants to ground water or an aquifer. NO YES
 (See Part 1. D.2.a, D.2.c, D.2.d, D.2.p, D.2.q, D.2.t)
If “Yes”, answer questions a - h. If “No”, move on to Section 5.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may require new water supply wells, or create additional demand on supplies from existing water supply wells.	D2c	<input type="checkbox"/>	<input type="checkbox"/>
b. Water supply demand from the proposed action may exceed safe and sustainable withdrawal capacity rate of the local supply or aquifer. Cite Source: _____	D2c	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may allow or result in residential uses in areas without water and sewer services.	D1a, D2c	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may include or require wastewater discharged to groundwater.	D2d, E2l	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may result in the construction of water supply wells in locations where groundwater is, or is suspected to be, contaminated.	D2c, E1f, E1g, E1h	<input type="checkbox"/>	<input type="checkbox"/>
f. The proposed action may require the bulk storage of petroleum or chemical products over ground water or an aquifer.	D2p, E2l	<input type="checkbox"/>	<input type="checkbox"/>
g. The proposed action may involve the commercial application of pesticides within 100 feet of potable drinking water or irrigation sources.	E2h, D2q, E2l, D2c	<input type="checkbox"/>	<input type="checkbox"/>
h. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

5. Impact on Flooding
 The proposed action may result in development on lands subject to flooding. NO YES
 (See Part 1. E.2)
If “Yes”, answer questions a - g. If “No”, move on to Section 6.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in development in a designated floodway.	E2i	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in development within a 100 year floodplain.	E2j	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may result in development within a 500 year floodplain.	E2k	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may result in, or require, modification of existing drainage patterns.	D2b, D2e	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may change flood water flows that contribute to flooding.	D2b, E2i, E2j, E2k	<input type="checkbox"/>	<input type="checkbox"/>
f. If there is a dam located on the site of the proposed action, is the dam in need of repair, or upgrade?	E1e	<input type="checkbox"/>	<input type="checkbox"/>

g. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>
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6. Impacts on Air			
The proposed action may include a state regulated air emission source. (See Part 1. D.2.f., D.2.h, D.2.g) <i>If "Yes", answer questions a - f. If "No", move on to Section 7.</i>		<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. If the proposed action requires federal or state air emission permits, the action may also emit one or more greenhouse gases at or above the following levels: i. More than 1000 tons/year of carbon dioxide (CO ₂) ii. More than 3.5 tons/year of nitrous oxide (N ₂ O) iii. More than 1000 tons/year of carbon equivalent of perfluorocarbons (PFCs) iv. More than .045 tons/year of sulfur hexafluoride (SF ₆) v. More than 1000 tons/year of carbon dioxide equivalent of hydrochloroflourocarbons (HFCs) emissions vi. 43 tons/year or more of methane	D2g D2g D2g D2g D2g D2h	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
b. The proposed action may generate 10 tons/year or more of any one designated hazardous air pollutant, or 25 tons/year or more of any combination of such hazardous air pollutants.	D2g	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may require a state air registration, or may produce an emissions rate of total contaminants that may exceed 5 lbs. per hour, or may include a heat source capable of producing more than 10 million BTU's per hour.	D2f, D2g	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may reach 50% of any of the thresholds in "a" through "c", above.	D2g	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may result in the combustion or thermal treatment of more than 1 ton of refuse per hour.	D2s	<input type="checkbox"/>	<input type="checkbox"/>
f. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

7. Impact on Plants and Animals			
The proposed action may result in a loss of flora or fauna. (See Part 1. E.2. m.-q.) <i>If "Yes", answer questions a - j. If "No", move on to Section 8.</i>		<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may cause reduction in population or loss of individuals of any threatened or endangered species, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2o	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in a reduction or degradation of any habitat used by any rare, threatened or endangered species, as listed by New York State or the federal government.	E2o	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may cause reduction in population, or loss of individuals, of any species of special concern or conservation need, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2p	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may result in a reduction or degradation of any habitat used by any species of special concern and conservation need, as listed by New York State or the Federal government.	E2p	<input type="checkbox"/>	<input type="checkbox"/>

e. The proposed action may diminish the capacity of a registered National Natural Landmark to support the biological community it was established to protect.	E3c	<input type="checkbox"/>	<input type="checkbox"/>
f. The proposed action may result in the removal of, or ground disturbance in, any portion of a designated significant natural community. Source: _____	E2n	<input type="checkbox"/>	<input type="checkbox"/>
g. The proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site.	E2m	<input type="checkbox"/>	<input type="checkbox"/>
h. The proposed action requires the conversion of more than 10 acres of forest, grassland or any other regionally or locally important habitat. Habitat type & information source: _____	E1b	<input type="checkbox"/>	<input type="checkbox"/>
i. Proposed action (commercial, industrial or recreational projects, only) involves use of herbicides or pesticides.	D2q	<input type="checkbox"/>	<input type="checkbox"/>
j. Other impacts: _____		<input type="checkbox"/>	<input type="checkbox"/>

8. Impact on Agricultural Resources			
The proposed action may impact agricultural resources. (See Part 1. E.3.a. and b.)		<input type="checkbox"/> NO	<input type="checkbox"/> YES
<i>If "Yes", answer questions a - h. If "No", move on to Section 9.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may impact soil classified within soil group 1 through 4 of the NYS Land Classification System.	E2c, E3b	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may sever, cross or otherwise limit access to agricultural land (includes cropland, hayfields, pasture, vineyard, orchard, etc).	E1a, E1b	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may result in the excavation or compaction of the soil profile of active agricultural land.	E3b	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may irreversibly convert agricultural land to non-agricultural uses, either more than 2.5 acres if located in an Agricultural District, or more than 10 acres if not within an Agricultural District.	E1b, E3a	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may disrupt or prevent installation of an agricultural land management system.	E1 a, E1b	<input type="checkbox"/>	<input type="checkbox"/>
f. The proposed action may result, directly or indirectly, in increased development potential or pressure on farmland.	C2c, C3, D2c, D2d	<input type="checkbox"/>	<input type="checkbox"/>
g. The proposed project is not consistent with the adopted municipal Farmland Protection Plan.	C2c	<input type="checkbox"/>	<input type="checkbox"/>
h. Other impacts: _____		<input type="checkbox"/>	<input type="checkbox"/>

9. Impact on Aesthetic Resources The land use of the proposed action are obviously different from, or are in sharp contrast to, current land use patterns between the proposed project and a scenic or aesthetic resource. (Part 1. E.1.a, E.1.b, E.3.h.) <i>If "Yes", answer questions a - g. If "No", go to Section 10.</i>				<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur		
a. Proposed action may be visible from any officially designated federal, state, or local scenic or aesthetic resource.	E3h	<input type="checkbox"/>	<input type="checkbox"/>		
b. The proposed action may result in the obstruction, elimination or significant screening of one or more officially designated scenic views.	E3h, C2b	<input type="checkbox"/>	<input type="checkbox"/>		
c. The proposed action may be visible from publicly accessible vantage points: i. Seasonally (e.g., screened by summer foliage, but visible during other seasons) ii. Year round	E3h	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>		
d. The situation or activity in which viewers are engaged while viewing the proposed action is: i. Routine travel by residents, including travel to and from work ii. Recreational or tourism based activities	E3h E2q, E1c	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>		
e. The proposed action may cause a diminishment of the public enjoyment and appreciation of the designated aesthetic resource.	E3h	<input type="checkbox"/>	<input type="checkbox"/>		
f. There are similar projects visible within the following distance of the proposed project: 0-1/2 mile 1/2 -3 mile 3-5 mile 5+ mile	D1a, E1a, D1f, D1g	<input type="checkbox"/>	<input type="checkbox"/>		
g. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>		

10. Impact on Historic and Archeological Resources The proposed action may occur in or adjacent to a historic or archaeological resource. (Part 1. E.3.e, f. and g.) <i>If "Yes", answer questions a - e. If "No", go to Section 11.</i>				<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur		
a. The proposed action may occur wholly or partially within, or substantially contiguous to, any buildings, archaeological site or district which is listed on or has been nominated by the NYS Board of Historic Preservation for inclusion on the State or National Register of Historic Places.	E3e	<input type="checkbox"/>	<input type="checkbox"/>		
b. The proposed action may occur wholly or partially within, or substantially contiguous to, an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory.	E3f	<input type="checkbox"/>	<input type="checkbox"/>		
c. The proposed action may occur wholly or partially within, or substantially contiguous to, an archaeological site not included on the NY SHPO inventory. Source: _____	E3g	<input type="checkbox"/>	<input type="checkbox"/>		

d. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>
e. If any of the above (a-d) are answered “Yes”, continue with the following questions to help support conclusions in Part 3:			
i. The proposed action may result in the destruction or alteration of all or part of the site or property.	E3e, E3g, E3f	<input type="checkbox"/>	<input type="checkbox"/>
ii. The proposed action may result in the alteration of the property’s setting or integrity.	E3e, E3f, E3g, E1a, E1b	<input type="checkbox"/>	<input type="checkbox"/>
iii. The proposed action may result in the introduction of visual elements which are out of character with the site or property, or may alter its setting.	E3e, E3f, E3g, E3h, C2, C3	<input type="checkbox"/>	<input type="checkbox"/>

11. Impact on Open Space and Recreation			
The proposed action may result in a loss of recreational opportunities or a reduction of an open space resource as designated in any adopted municipal open space plan. (See Part 1. C.2.c, E.1.c., E.2.q.) <i>If “Yes”, answer questions a - e. If “No”, go to Section 12.</i>		<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in an impairment of natural functions, or “ecosystem services”, provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat.	D2e, E1b E2h, E2m, E2o, E2n, E2p	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in the loss of a current or future recreational resource.	C2a, E1c, C2c, E2q	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may eliminate open space or recreational resource in an area with few such resources.	C2a, C2c E1c, E2q	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may result in loss of an area now used informally by the community as an open space resource.	C2c, E1c	<input type="checkbox"/>	<input type="checkbox"/>
e. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

12. Impact on Critical Environmental Areas			
The proposed action may be located within or adjacent to a critical environmental area (CEA). (See Part 1. E.3.d) <i>If “Yes”, answer questions a - c. If “No”, go to Section 13.</i>		<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in a reduction in the quantity of the resource or characteristic which was the basis for designation of the CEA.	E3d	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in a reduction in the quality of the resource or characteristic which was the basis for designation of the CEA.	E3d	<input type="checkbox"/>	<input type="checkbox"/>
c. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

13. Impact on Transportation The proposed action may result in a change to existing transportation systems. <input type="checkbox"/> NO <input type="checkbox"/> YES (See Part 1. D.2.j) <i>If "Yes", answer questions a - g. If "No", go to Section 14.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Projected traffic increase may exceed capacity of existing road network.	D2j	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in the construction of paved parking area for 500 or more vehicles.	D2j	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action will degrade existing transit access.	D2j	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action will degrade existing pedestrian or bicycle accommodations.	D2j	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may alter the present pattern of movement of people or goods.	D2j	<input type="checkbox"/>	<input type="checkbox"/>
f. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

14. Impact on Energy The proposed action may cause an increase in the use of any form of energy. <input type="checkbox"/> NO <input type="checkbox"/> YES (See Part 1. D.2.k) <i>If "Yes", answer questions a - e. If "No", go to Section 15.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action will require a new, or an upgrade to an existing, substation.	D2k	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action will require the creation or extension of an energy transmission or supply system to serve more than 50 single or two-family residences or to serve a commercial or industrial use.	D1f, D1q, D2k	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may utilize more than 2,500 MWhrs per year of electricity.	D2k	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may involve heating and/or cooling of more than 100,000 square feet of building area when completed.	D1g	<input type="checkbox"/>	<input type="checkbox"/>
e. Other Impacts: _____ _____			

15. Impact on Noise, Odor, and Light The proposed action may result in an increase in noise, odors, or outdoor lighting. <input type="checkbox"/> NO <input type="checkbox"/> YES (See Part 1. D.2.m., n., and o.) <i>If "Yes", answer questions a - f. If "No", go to Section 16.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may produce sound above noise levels established by local regulation.	D2m	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in blasting within 1,500 feet of any residence, hospital, school, licensed day care center, or nursing home.	D2m, E1d	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may result in routine odors for more than one hour per day.	D2o	<input type="checkbox"/>	<input type="checkbox"/>

d. The proposed action may result in light shining onto adjoining properties.	D2n	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may result in lighting creating sky-glow brighter than existing area conditions.	D2n, E1a	<input type="checkbox"/>	<input type="checkbox"/>
f. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

16. Impact on Human Health			
The proposed action may have an impact on human health from exposure to new or existing sources of contaminants. (See Part 1.D.2.q., E.1. d. f. g. and h.) <i>If "Yes", answer questions a - m. If "No", go to Section 17.</i>		<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action is located within 1500 feet of a school, hospital, licensed day care center, group home, nursing home or retirement community.	E1d	<input type="checkbox"/>	<input type="checkbox"/>
b. The site of the proposed action is currently undergoing remediation.	E1g, E1h	<input type="checkbox"/>	<input type="checkbox"/>
c. There is a completed emergency spill remediation, or a completed environmental site remediation on, or adjacent to, the site of the proposed action.	E1g, E1h	<input type="checkbox"/>	<input type="checkbox"/>
d. The site of the action is subject to an institutional control limiting the use of the property (e.g., easement or deed restriction).	E1g, E1h	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may affect institutional control measures that were put in place to ensure that the site remains protective of the environment and human health.	E1g, E1h	<input type="checkbox"/>	<input type="checkbox"/>
f. The proposed action has adequate control measures in place to ensure that future generation, treatment and/or disposal of hazardous wastes will be protective of the environment and human health.	D2t	<input type="checkbox"/>	<input type="checkbox"/>
g. The proposed action involves construction or modification of a solid waste management facility.	D2q, E1f	<input type="checkbox"/>	<input type="checkbox"/>
h. The proposed action may result in the unearthing of solid or hazardous waste.	D2q, E1f	<input type="checkbox"/>	<input type="checkbox"/>
i. The proposed action may result in an increase in the rate of disposal, or processing, of solid waste.	D2r, D2s	<input type="checkbox"/>	<input type="checkbox"/>
j. The proposed action may result in excavation or other disturbance within 2000 feet of a site used for the disposal of solid or hazardous waste.	E1f, E1g E1h	<input type="checkbox"/>	<input type="checkbox"/>
k. The proposed action may result in the migration of explosive gases from a landfill site to adjacent off site structures.	E1f, E1g	<input type="checkbox"/>	<input type="checkbox"/>
l. The proposed action may result in the release of contaminated leachate from the project site.	D2s, E1f, D2r	<input type="checkbox"/>	<input type="checkbox"/>
m. Other impacts: _____ _____			

17. Consistency with Community Plans			
The proposed action is not consistent with adopted land use plans. (See Part 1. C.1, C.2. and C.3.) <i>If “Yes”, answer questions a - h. If “No”, go to Section 18.</i>		<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action’s land use components may be different from, or in sharp contrast to, current surrounding land use pattern(s).	C2, C3, D1a E1a, E1b	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action will cause the permanent population of the city, town or village in which the project is located to grow by more than 5%.	C2	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action is inconsistent with local land use plans or zoning regulations.	C2, C2, C3	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action is inconsistent with any County plans, or other regional land use plans.	C2, C2	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may cause a change in the density of development that is not supported by existing infrastructure or is distant from existing infrastructure.	C3, D1c, D1d, D1f, D1d, E1b	<input type="checkbox"/>	<input type="checkbox"/>
f. The proposed action is located in an area characterized by low density development that will require new or expanded public infrastructure.	C4, D2c, D2d D2j	<input type="checkbox"/>	<input type="checkbox"/>
g. The proposed action may induce secondary development impacts (e.g., residential or commercial development not included in the proposed action)	C2a	<input type="checkbox"/>	<input type="checkbox"/>
h. Other: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

18. Consistency with Community Character			
The proposed project is inconsistent with the existing community character. (See Part 1. C.2, C.3, D.2, E.3) <i>If “Yes”, answer questions a - g. If “No”, proceed to Part 3.</i>		<input type="checkbox"/> NO	<input type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may replace or eliminate existing facilities, structures, or areas of historic importance to the community.	E3e, E3f, E3g	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may create a demand for additional community services (e.g. schools, police and fire)	C4	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may displace affordable or low-income housing in an area where there is a shortage of such housing.	C2, C3, D1f D1g, E1a	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may interfere with the use or enjoyment of officially recognized or designated public resources.	C2, E3	<input type="checkbox"/>	<input type="checkbox"/>
e. The proposed action is inconsistent with the predominant architectural scale and character.	C2, C3	<input type="checkbox"/>	<input type="checkbox"/>
f. Proposed action is inconsistent with the character of the existing natural landscape.	C2, C3 E1a, E1b E2g, E2h	<input type="checkbox"/>	<input type="checkbox"/>
g. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

Review of Trinitas LEAF-SEQR part 2

David Weinstein 12-5-18

The following contains the reasons where I judged the impacts as “moderate or large” on the Trinitas LEAF-SEQR part 2 as indicated above. I included only those items I feel are likely to produce moderate or large impacts, and only the reasons for this likelihood that I felt were relevant to this Trinitas project, as described in the “SEQR Part 2 - Identification of Potential Project Impacts (FEAF) Full Environmental Assessment Form (FEAF) Workbook”

<http://www.dec.ny.gov/permits/91690.html>

Question 1. Impact on Land

a. The proposed action may involve construction on land where depth to water table is less than 3 feet.

DW comment: A sizeable portion of the land disturbance will be located where project site soils are poorly drained (47% of the site).

Moderate to Large Impact:

Proposed projects that are much larger in scale, where areas of shallow depth to water table is extensive and unavoidable and where there is a higher potential for water pollution could have a moderate to large impact.

- Major excavation that does not avoid high water table
 - Residential development with full basements and high water table.

b. The proposed action may involve construction on slopes of 15% or greater.

Moderate to Large Impact:

Proposed projects that are much larger in scale, where there are extensive areas of slopes greater than 15%, that are unavoidable, where there is a higher risk of stormwater runoff and erosion impacting valley streams and waterbodies, or where the project is on a site that is highly visible could have a moderate to large impact.

- Extensive excavation on steep slopes where cut and fill will leave slopes steeper than exist now.
- Removal of large areas of vegetation on steep slopes from the site.
- Visibility will be increased due to position on a slope.

d. The proposed action may involve the excavation and removal of more than 1,000 tons of natural material.

Moderate to Large Impact:

- Large excavations that have potential impacts such as noise, air pollution, visual impacts due to changed landscapes and community character, introduction of large scale land uses that are in sharp contrast to existing uses, or removal of vegetation that will result in fragmentation of habitats.

f. The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal (including from treatment by herbicides).

DW comment: A large portion of the parcel will have impervious surfaces (47.3%) and a large portion of the parcel will be physically disturbed or have vegetation removed.

Moderate to Large Impact:

- Large areas of vegetation will be removed from the site.
- Large portions of development will occur on steep slope areas.

Question 3 - Impacts on Surface Water

d. The proposed action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body.

Moderate to Large Impact:

- The construction will change drainage patterns and result in water flow to adjacent properties or to areas that previously have not flooded.
- Construction removes a moderate to large amount of streamside, lakeside or wetland vegetation.

h. The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.

Moderate to Large Impact:

When moderate to large areas of vegetation are removed and soils exposed, erosion and stormwater discharges may cause siltation.

- When many impervious surfaces such as large parking lots and large scaled buildings are planned, where there is risk that such runoff will affect downstream waterbodies.

i. The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.

Moderate to Large Impact:

- Water quality impacts resulting from the project may occur frequently, or long-term.

k. The proposed action may require the construction of new, or expansion of existing, wastewater treatment facilities.

Moderate to Large Impact:

DW comment: The sewage water produced by this development will either

- 1) exceed the existing excess capacity available to Dryden, or
- 2) will use up almost all of the existing excess capacity, leaving little for future development on other parcels, or
- 3) will require the Town of Dryden to purchase additional excess capacity, if it is even available, costing all the taxpayers of Dryden funds because of this development.

Question 4 - Impacts on Ground Water

h. Other impacts: The capacity of the sewer system will be over-taxed, increasing the likelihood of pipe breaks and undetected leaks.

Question 5 - Impact on Flooding

d. The proposed action may result in, or require, modification of existing drainage patterns.

Moderate to Large Impact:

Moderate to large impacts could occur under:

- Clearing or grading, creation of walls or berms that alter the flow of water or drainage patterns.
- Altered flow can increase flooding and introduce more erosion and potential for pollution.
- Stormwater will be directed into a water treatment facility that is already over-capacity. This can cause impacts when stormwater surges allow sewage to flow untreated into rivers and streams.

e. The proposed action may change flood water flows that contribute to flooding.

Any project that alters or increases surface water runoff has the potential to contribute to flooding, both on-site and at downstream, upstream, or across stream locations.

Moderate to Large Impact:

It is likely that one or more moderate to large impacts could occur under one or more of these circumstances:

- When land uses with high percentages of the lot are covered in impervious surfaces.
- Where stormwater generated on site will impact water bodies off-site on other properties.
- With projects that generate large amounts of stormwater that need engineered stormwater control devices.

Question 7 - Impact on Plants and Animals

g. The proposed action may substantially interfere with nesting/breeding, foraging, or overwintering habitat for the predominant species that occupy or use the project site.

Moderate to Large Impact:

It is likely that one or more moderate to large impacts could occur under one or more of these circumstances:

- A large percentage of the vegetation is removed and replaced with lawns or other cover types and structures.
- A major feature of the habitat is removed, such as removal of all ground vegetation.
- Large areas of trees will be selectively removed to thin the forest and allow more sunlight to reach the ground. This will change the ecology of the forest and thus the species that will live there.
- Bright lights will be placed that will interfere with nocturnal species.

Question 8 - Impact on Agricultural Resources

a. The proposed action may impact soil classified within soil group 1 through 4 of the NYS Land Classification System.

It is likely that one or more moderate to large impacts could occur:

- There will be permanent loss of these soils with no chance of use for agricultural purposes again.

f. The proposed action may result, directly or indirectly, in increased development potential or pressure on farmland.

Moderate to Large Impact:

It is likely that one or more moderate to large impacts could occur under one or more of these circumstances:

- Provision of water and sewer systems as well as road improvements that bring more people and traffic to a farming area. These are growth inducing and will likely negatively impact farms over time.
- Land use conversions that increase the price of land make it harder for farmers to maintain their land due to increased taxes and makes it harder to buy new land to expand operations.

Question 9 - Impact on Aesthetic Resources

a. Proposed action may be visible from any officially designated federal, state, or local scenic or aesthetic resource.

Moderate to Large Impact:

Some examples of moderate to large impacts that might fall into this category are:

- The project will be visible and is in sharp contrast to surrounding land uses by virtue of its scale, dimension, color, or height.
- The project is not in sharp contrast to existing land uses in the area but is very visible.
- The project is situated so that it changes the visual aspect of the scenic resource.

c. The proposed action may be visible from publicly accessible vantage points: i. Seasonally (e.g., screened by summer foliage, but visible during other seasons) ii. Year round

Moderate to Large Impact:

Some examples of moderate to large impacts that might fall into this category are:

- The site will be very visible all year round and will not be screened by vegetation.
- The project is viewed by many publicly accessible vantage points.
- The project results in a land use that is in sharp contrast to surrounding land uses seen from or in the scenic resource.
- The project is of scale, color, or dimension that will be highly visible from publicly accessible scenic resources.

d. The situation or activity in which viewers are engaged while viewing the proposed action is:

- i. Routine travel by residents, including travel to and from work
- ii. Recreational or tourism based activities

e. The proposed action may cause a diminishment of the public enjoyment and appreciation of the designated aesthetic resource.

Moderate to Large Impact:

Some examples of moderate to large impacts that might fall into this category are:

- The project site is visible from major roads and highly traveled routes used by many residents and visitors.
- The project site is visible from, is in, or obstructs a scenic resource that plays a key role as part of a recreational or tourist asset of the community.
- The project site is visible and because it is in sharp contrast to the scenic resource and surrounding land uses, will significantly reduce enjoyment and appreciation of the scenic resource.

f. There are similar projects visible within the following distance of the proposed project:

0-1/2 mile
1/2 -3 mile

Moderate to Large Impact:

Some examples of moderate to large impacts that might fall into this category are:

- The project is visible, but there are none or very few other land uses of similar scale, design, density, dimension, or location nearby so that the context of the scenic resource changes and the proposed activity will be in sharp contrast to existing resources.

Question 11 - Impact on Open Space and Recreation

a. The proposed action may result in an impairment of natural functions, or "ecosystem services", provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, and wildlife habitat.

Moderate to Large Impact:

A moderate to large impact could occur under one or more of these circumstances:

- Large areas of the natural resource will be physically disturbed, obstructed, or diminished.
- The proposed project may have small impacts but is one that is likely to induce future growth that will have adverse cumulative impacts.

e. Other impacts: The project may result in a loss of open spaces that contribute to the community's character or scenic designations

Question 13 - Impact on Transportation

a. Projected traffic increase may exceed capacity of existing road network

Moderate to Large Impact:

A moderate to large impact could occur under one or more of these circumstances:

- The project adds substantial traffic to the area.
- The project adds some level of, but not substantial traffic (as defined in Part 1, Question D2. J.) to the area, but due to current road, traffic, and intersection conditions, the road does not have the capacity to handle it.

b. The proposed action may result in the construction of paved parking area for 500 or more vehicles.

Issues related to large parking lots include stormwater runoff, loss of vegetation, impaired aesthetics, increases in surface heating (the urban heat island effect), and traffic congestion. Different impacts may arise from parking garages, automated parking facilities, and parking. A paved parking area for 500 or more vehicles generally corresponds to the parking requirements for a non-residential structure having 100,000 square feet of gross floor area. This is the threshold contained in 617.4(b)(6)(iv). However, the reviewing agency should review impacts of all sized parking lots because all paved parking lots have the same types of potential impacts.

Moderate to Large Impact:

A moderate to large impact could occur under one or more of these circumstances:

- Parking lots of any size that require construction of turning lanes or traffic lights are proposed.
- Parking lots of any size that are used on a regular basis and that have other design features that may result in impacts such as all-night illumination, disturb one acre or more of land, or is located within a residential zoning district.
- Parking lots of any size or type that creates a streetscape that is in sharp contrast to the existing character of the community or neighborhood.

Question 14 - Impact on Energy

The proposed action may cause an increase in the use of any form of energy.

c. The proposed action may utilize more than 2,500 MWhrs per year of electricity or consists of more than 100,000 square feet..

- 219 units * an national average of (0.97 per month *12 months) MWhrs =2549 MWhrs

- Does the proposed action incorporate any energy efficient design features and technologies such as incorporated in:
 - The [NY Energy Star Homes](#) Program?
 - The ICC/NAHB [Green Building Standard](#)?
 - The US Green Building Council's [Leadership in Energy and Environmental Design](#) (LEED)?
- Has the municipality adopted the [Climate Smart Communities Pledge](#)?

Moderate to Large Impact:

- Proposed projects that are much larger in scale than the surrounding land uses, or that are in a remote area with limited energy infrastructure, could have a moderate to large impact. Some examples that might fall into this category are:
 - Large number of residential units in a rural area.

d. The proposed action may involve heating and/or cooling of more than 100,000 square feet of building area when completed.

Moderate to Large Impact:

- Proposed projects that are much larger in scale than the surrounding land uses, or that are in a remote area with limited energy infrastructure, could have a moderate to large impact. Some examples that might fall into this category are:
 - Large number of residential units in a rural area.

Question 15 - Impact on Noise, Odor, and Light

b. The proposed action may result in blasting within 1,500 feet of any residence, hospital, school, licensed day care center, or nursing home.

Moderate to Large Impact:

A moderate to large impact could occur under one or more of these circumstances:

- Blasting will take place within 1,500 feet from any residence, hospital, school, licensed day care center, or nursing home,

e. The proposed action may result in lighting creating sky-glow brighter than existing area conditions.

Moderate to Large Impact:

A moderate to large impact could occur under one or more of these circumstances:

- Lighting will remain illuminated all night.

- Lighting will be created in a rural area where there is currently dark skies and little sky glow.
- There are no natural barriers present to screen lighting effects and the project site is visible from adjacent land uses.

Question 16 - Impact on Human Health

- a. The proposed action is located within 1500 feet of a school, hospital, licensed day care center, group home, nursing home or retirement community.
- h. The proposed action may result in the unearthing of solid or hazardous waste.

If an action is on a site that unearths solid or hazardous wastes that have been previously deposited, there is a higher risk for spill, leaking, leaching, or emission of those substances into the environment.

Moderate to Large Impact:

A moderate to large impact could occur under one or more of these circumstances:

- There is a new use or high density residential development proposed near an existing site.

Question 17 - Consistency with Community Plans

The proposed action is not consistent with adopted land use plans. New York State statutes require that all land use laws in a municipality be consistent with a comprehensive plan.

When reviewing adopted plans, pay special attention to the vision and goals, and the maps that may be included in the plan. When a comprehensive plan exists, an action would be considered consistent if it is not in conflict with the stated vision, goals, recommendations or land use concept map. Some of the questions that may be helpful to evaluate this include:

- How do the vision and goals described in these plans compare with various elements of the proposed project?
 - Do any elements of the proposed project conflict the vision, goals, and strategies outlined in any of these adopted plans?

- a. The proposed action's land use components may be different from, or in sharp contrast to, current surrounding land use pattern(s).

Analysis

- What is the scale and size of the project site in comparison to current land uses?
 - Is the structure larger?
 - Taller?
 - On a different lot size?

- Of a very different land use?
- Of an architectural design that is in sharp contrast?
- Sited on the parcel in a very different manner?
- Is the intensity of the proposed similar or different from surrounding uses?
 - Will there be more people at the site than surrounding uses?
 - More traffic?
 - More structures on the lot and less green space than others?

A small impact could occur if:

- The proposed project is not consistent with surrounding land use patterns, but the community has specifically zoned the area for those new uses and the project is consistent with those community laws **and goals**.

Moderate to Large Impact:

A moderate to large impact could occur if:

- The proposed project is not consistent in its proposed use, dimensions of the lot, dimensions and location of all structures, setbacks, size of the structure(s), accessory uses, and overall scale and intensity with existing land uses and local laws and plans encourage maintenance of such existing uses.

b. The proposed action will cause the permanent population of the city, town or village in which the project is located to grow by more than 5%.

A population increase of 5% or more has many implications for a community. It may mean there is need for additional water and sewer infrastructure, new roads, new schools, or additional municipal services. Such population increases also bring new building: there will be a need for more residences and businesses to serve them. All of these could result in significant adverse environmental impacts.

A moderate to large impact could occur under one or more of these circumstances:

- A proposed project that results in a population growth that exceeds 5% of the current municipal population.
- A proposed project that results in any population growth that would result in the expansion or creation of new infrastructure, housing, services, or other municipal capacity to accommodate that level of growth.

c. The proposed action is inconsistent with local land use plans or zoning regulations.

Analysis

- Is the project consistent with the vision and goals established in those plans or zoning laws?
 - Is it likely that the proposed project will prevent the municipality from attaining those vision and goals?
- Do any strategies, recommendations, maps, or other actions in the plans address the proposed land use or location?
 - If so, how, and is the project consistent with those?
- Are any variances or zoning changes required?
- Are those variances area variances or use variances?
 - Both types of variances may mean that the project is not consistent with local regulations.

Moderate to Large Impact:

A moderate to large impact could occur if:

- The proposed action is largely or totally incompatible with the land use plans or zoning in the community. It is likely that one or more moderate to large impacts could occur under one or more of these circumstances:
 - A use variance is required.
- If a project is in conflict with the stated vision, goals, recommendations or land use concept map of a comprehensive plan, then the proposed action is inconsistent with land use plans.

e. The proposed action may cause a change in the density of development that is not supported by existing infrastructure or is distant from existing infrastructure.

DW comment: The sewage water produced by this development will either:

- 1) exceed the existing excess capacity available to Dryden, or
- 2) will use up almost all of the existing excess capacity, leaving little for future development on other parcels, or
- 3) will require the Town of Dryden to purchase additional excess capacity, if it is even available, costing all the taxpayers of Dryden funds because of this development.

f. The proposed action is located in an area characterized by low density development that will require new or expanded public infrastructure

Infrastructure includes such things as water, sewer, new or upgraded roads, sidewalks or paths, and solid waste facilities. When a project requires new or expanded infrastructure, it not only has direct effects on the environment due to land disturbance, but can also affect taxes, the fiscal health of a community, and future growth. Once infrastructure is in place, new land uses typically follow. In many places, **residential growth does not bring in adequate tax dollars to**

support the infrastructure needed to support it. Thus, infrastructure itself is a growth inducement that could impact the environment in the short and long-term.

(DW comment- In a national 2010 study of 126 different residential projects located in all different areas of the country and type and sizes of residential development, only 3 brought in more revenue than they cost the town in added road maintenance, emergency services, etc.). Only 3 paid for themselves).

Projects that require additional external sidewalks or other pedestrian facilities, an extension of an existing road, **addition of a turning lane or traffic light**, or upgrading a private road to public road standards are examples of impacts that could be considered small depending on the scale and context of the proposed project.

Moderate to Large Impact:

A moderate to large impact could also occur if the proposed project induces growth at a level that requires additional infrastructure beyond those identified above as small impact.

g. The proposed action may induce secondary development impacts (e.g., residential or commercial development not included in the proposed action)

Moderate to Large Impact:

A moderate to large impact could occur if the proposed project induces growth at a level that requires additional infrastructure, community services, or if it would be at a density or type of land uses that changes the community character.

Question 18 - Consistency with Community Character

The proposed project is inconsistent with the existing community character.

Community character is defined by all the man-made and natural features of the area. It includes the visual character of a town, village, or city, and its visual landscape; but also includes the buildings and structures and their uses, the natural environment, activities, town services, and local policies that are in place. These combine to create a sense of place or character that defines the area.

Changes to the type and intensity of land use, housing, public services, aesthetic quality, and to the balance between residential and commercial uses can all change community character. Most proposed actions will result in some change in community character.

Reviewing agencies will need to first understand what the existing community character is. Sometimes this is clearly defined in a comprehensive plan.

a. The proposed action may replace or eliminate existing facilities, structures, or areas of historic importance to the community.

Moderate to Large Impact:

A moderate to large impact could occur under one or more of these circumstances:

- The proposed project moderately or significantly changes the visual character of the area.
- The proposed project is of a larger scale than currently exists in the area.
- New building design, lot layout, streetscapes, or intensity of use is in sharp contrast to that which exists.
- The project introduces a land use that is inconsistent or in sharp contrast with surrounding land uses.
- The project introduces odors, lights, noise, or traffic to an area in a way that is different than currently exists.

b. The proposed action may create a demand for additional community services (e.g. schools, police and fire)

Part of a community's character comes from the community services that are available because those contribute to the sense of community residents have. Growth and development can change this part of community character by bringing in more people to an area, who in turn, demand more in public services. This demand can result in the need for municipalities to build more schools, parks, roads, and infrastructure, or can bring in crime and the need for additional police, fire and emergency services.

A rural or a small community that relies on volunteers for these services, or has a school district that has little capacity to accept growth may be less able to absorb the same increase in demand.

Analysis

- Will the proposed project result in an increase in population that will require the community to invest in additional public services?
 - Where will these services be physically located, and how might they change the sense of place and character of the community?

Moderate to Large Impact:

A moderate to large impact may occur if:

- The demands on public services will increase and result in the need to extend existing services.

c. The proposed action may displace affordable or low-income housing in an area where there is a shortage of such housing.

Moderate to Large Impact:

There may be a moderate to large impact if:

- The proposed project will result in a decrease in the number of affordable housing units where the availability of such housing is limited and not expected to meet demand.

e. The proposed action is inconsistent with the predominant architectural scale and character.

Predominant architectural scale and character need to be defined locally: they are determined through understanding the size, height, dimensions, and intensity of uses as they already exist in the neighborhood or community.

A new structure(s) that is larger, taller, or of different architectural style, could be inconsistent with the existing character.

Moderate to Large Impact:

There may be a moderate to large impact if:

- The proposed project introduces an architectural style that is in sharp contrast in its size, window or door size and style, building materials, roof pitch, façade, color, or signage with existing or surrounding buildings.

f. Proposed action is inconsistent with the character of the existing natural landscape.

Moderate to Large Impact:

There may be a moderate to large impact if:

- Significant portions (in size and in importance to the community) of the natural landscape are removed or changed, such as through blasting, grading, filling, or removal of predominant vegetation growing in the area.
- There are more buildings, lawns, roads, and other structures introduced into an area that is currently rural and undeveloped.
- A proposed project includes a road that is highly visible where no other built features can be seen.
- Structures taller than the predominant vegetation are introduced.

Review of Trinitas Full Environmental Assessment Form:

D.A. Weinstein 12/5/18

Page 1 A. Brief description of proposed action: Missing information

The description fails to mention that a portion of the project will have 4 stories, in direct conflict with the Varna Design Guidelines and Landscape Standards, Appendix E, p8, Guidelines for Building Scale, of the Dryden Zoning Law, which states, "Maximum building height for buildings should be no more than **three stories** and 40 feet in height." The project materials fail to mention this conflict, in direct violation with Section 702 of the Zoning Law which requires reporting of such conflicts.

Page 2 C.2 Adopted land use plans: Missing information

Although not required to be described in this section, under "Does the comprehensive plan include specific recommendations for the site where the proposed action would be located?" a statement should be added identifying that the plan shows a use of this location that is entirely different and in conflict with the proposed use.

Page 3 C.3. c. Zoning: Incorrect marking and under "I", missing information

Under any reasonable interpretation of the Dryden requirement for % Green Space for this location, the project fails to provide this required amount and consequently will have to receive a variance, which is a change of zoning. The form already acknowledges the need for a variance for setbacks. The marking should be changed to "Yes" and a statement describing the need for variances added under "I".

Page 3 C.4. b. Missing information

The Ithaca Police do not exclusively provide service to this location. The primary service provider is the Tompkins County Sherriff, with assistance from the NY State Police, particularly for traffic control and accident investigation.

Page 3 C.4. d. Erroneous information

This name should be changed to Cornell Botanic Gardens (eliminate "and Plantations").

Page 3 D.1. d. i. Purpose of type of subdivision? Erroneous information #5:

This project is collapsing 6 lots, owned by two different owners, into 1 lot. It is important to mention this fact in consideration of the EAF. Currently, no action has been taken to do this.

Page 4 D1. h. ii. Missing information

The principle source of water into the proposed water impoundment is not only the listed “storm water runoff from the project site”, but also a permanent surface water stream that enters the through a culvert under the former railroad bed from the agricultural fields upslope.

Page 4 D2. a. Project Operations: Erroneous marking and information

A major parking garage is being planned, the construction of which will require digging significantly into the hillside. It is difficult to understand how this is not considered excavation beyond the category of “General Site Preparations.” Consequently, this should be marked “Yes” and the appropriate descriptions added under “i” through “ix”.

Page 5 D2. b. ii Alternation of wetland: Missing information

It should be pointed out that by comparing the size of the wetland indicated in b.i. of 0.5 acres and the amount to be disturbed indicated in b. ii of 0.46 acres, almost the entire wetland will be disturbed. Note that this “0.46” is rounded up to “0.5” in “iv” below.

Page 5 D2. b. iv Destruction of Wetland: Missing information

Since it is indicated that the entire wetland will be disturbed and replaced by 0.9 acres of aquatic vegetation, essentially a new wetland, a detailed description of how this new wetland will be constructed and maintained must be provided to see if it will be done correctly.

Page 5 D2. b. v Destruction of Wetland: Missing information

Given a wetland reconstruction is required, a much more detailed explanation of how this will be done needs to be included. It is insufficient to just say, “site will be seeded and stabilized with the appropriate mix.”

Page 5 D2. c. I Demand for water: Erroneous information

The estimate of 47,250 gallons per day is based on the value from the “New York State Design Standards for Intermediate Sized Wastewater Treatment Systems, March 5, 2014” for boarding schools of 75 gal/per/person per day. The justification for use of this value was given by the engineering firms from anecdotal observations, without any data provided, of a few apartment complexes. This is an inappropriate value to use for this critical estimate given the limited capacity for sewage generation in this area.

Instead, the value the Design Manual for “apartment” of 110 gal/person/day should be used.

Tompkins County has a median water use of 108 gal per person per day, with a peak value of 133 gal/person/day. Even Trinitas’ own submittals on the 6/30/18 version of the Environmental Assessment Form indicated an estimate of 76,000 gals per day.

Page 5 D2. d. I Sewage waste: Erroneous information

Using the appropriate value of water use at 108 gal per person per day, the expected water use would be 65,000 gal /day.

Therefore, the expected sewage generation would be 65,000 gal /day.

Page 5 D2. d. III Does the existing wastewater treatment plant have capacity to serve the project?

This sewage quantity exceeds the 63,000 gallons per day that the town's engineering consulting firm, T.G.Miller, indicated in 2016 was Dryden's available excess capacity.

Further, the sewage would be fed to the Ithaca Wastewater Treatment Plant through a value that must also service the sewage from the new 2200 bed North Campus facility on the Cornell campus. Engineers have indicated that this value is incapable of handling the sewage production from both the Trinitas complex and the North Campus facility.

Because of the old condition of the area's sewer lines, the Special Joint Committee of the Tompkins County Area Wastewater Treatment Plant, the plant's managing body, calculates that amount of sewage reaching the Treatment Plant as 60% more than the daily use.

Consequently, the value of sewage expected to be delivered by the Trinitas project to the wastewater plant is 104,000 gals per day, more than double what their engineers submitted.

No plan is offered for how the additional capacity is going to be obtained, or how the depletion of this capacity by this one owner will affect all of the other owners wishing to propose projects in the future.

Page 6 D2. e. I Impervious surface: Erroneous information

The 7.9 acres of impervious surface means that only 52.7% of the project will be pervious surface. In any reasonable definition of green space, this amount does not begin to approach the 60% required by the Zoning.

Page 6 D2. e. iv Minimizing impervious surfaces or re-using storm water?: Erroneously marked

No information has been provided that demonstrates any effort to minimize impervious surfaces or reuse storm water. Consequently, this should be marked "No", not "yes".

In what way, shape, or form does 47.3% impervious space minimize impervious surfaces in the proposed plan? Their reasoning must be fully described.

Page 7 D2. j. Substantial increase in traffic? Possible erroneous marking

It is difficult to imagine how a minimum of 424 additional cars, all attempting to turn left into a steady stream of traffic during the morning hours to make it to classes will not create major traffic problems. The issue is not so much whether there will be a substantial increase in traffic on Rt 366 going west in the morning and east at night, since there is already a steady stream during the rush hours. The issue is whether frustrated drivers unable to find substantial gaps in the traffic will take large risks, leading to accidents.

The traffic study includes only the intersections of Rt 366 with Game Farm Road (intersection 1) and with Mt. Pleasant/Freese roads (intersection 2). There is a greater area being impacted by the traffic. No map of this area was included in the traffic study, since they narrowed the scope to only the intersections with Rt 366. Intersections 1 and 2 are the most critical, but consideration of the following issues make other intersections important.

1. Intersection 2 is already a problematic one, given the steady stream of cars between 7AM and 10AM going west to Cornell, the volume of cars coming from Freese Road on the north of this intersections (2000 cars per day), and the anticipation that almost all of the cars going from the proposed student housing project (552 beds, 424 proposed parking spaces) will be attempting to turn left toward Cornell at similar times to get to classes that start approximately at 8AM, 9AM, and 10AM.

2. The project proposes to lessen the load of cars attempting to turn left at this intersection by requiring cars to turn right on to Mt. Pleasant road (intersection 3, on a steep portion of a steep hill), where they will have to turn right on to Turkey Hill Road (at a steep entrance to the intersection with poor visibility to the left), right on Stephenson Rd, right on to Game Farm Rd, and then left at intersection 1 with Rt 366 to go to Cornell. It is anyone's guess as to how many students will obey this mandate to go right at intersection 3.

In addition, it is unclear why the traffic study limited the time considered to 7AM to 8:45 when many classes start at 10AM.

As anyone in the area can tell you, it is already a major problem to attempt to turn left on to Rt 366. in the morning because there are very few breaks in the steady stream of traffic moving west toward Cornell on Rt 366.

This is such a critical potential impact that an independent traffic engineering firm has been hired to provide a second opinion, and the results are not yet available.

Page 7 D2. j. iii Substantial increase in traffic? Questionable value provided

It is difficult to imagine where the current 42 parking places that will be replaced are currently located.

Page 7 D2. j. iii Hours of operation- Unacceptable information:

The hours proposed during construction are completely unacceptable for a development occurring within a residential area:

Monday-Friday should be 8AM to 6PM, not 6AM to 6PM

Saturday construction should not be allowed.

Sunday construction should not be allowed.

If it must be allowed it should be 12PM to 4PM, not 12AM to 4PM

Holiday construction should not be allowed.

Page 9 E.1. b. Land use after construction?

Note again that the amount of impervious surface after construction (47.3%) does not permit the project to meet the required green space goal of 60%.

Note that when it was previously indicated that there would be 0.9 acres of aquatic vegetation, here it indicates more precisely that 0.75 of this will be wetland and 0.1 will be open water (the sum was rounded up to make 0.9 acres).

Page 11 E2. a. Depth to bedrock? Questionable value provided.

Depth to bedrock is likely to be much less on the upslope south side of the project.

Page 11 E.2. e. Drainage status of soils? Potential problem

Nearly 50% of the soils are poorly drained. This means that during peak rainfall events the storm water system will be under extremely high pressure to function effectively, with the likely effect that there will be large amounts of surface flow water that will escape this system and flow onto roads and on to the houses located at the bottom of the steep slopes.

Page 11 E.2. f. Slopes? Potential problem

The fact that 1/3rd of the site has slopes over 10% (half of this greater than 15%), will exacerbate this problem mentioned above. Note that the Dryden Conservation board, containing several members with professional expertise in the environmental problems associated with steep slopes, has passed a resolution advising the Town Board against allowing building or disturbance on these steep slopes.

Page 11 E.2. h. I Wetlands? Erroneous marking

The form indicated in several places earlier that there are wetlands and streams on the site. Therefore, this is incorrectly marked and should be changed to "Yes".

Page 11 E.2. h. iv Streams? Erroneous marking

The form indicated previously that there is a stream on the property, which is correct and should be marked here.

Page 12 E.2. m. Wildlife? Insufficient information provided.

Much more information about probable wildlife on the site is required to demonstrate that the developers actually considered this question in more than an off-the-cuff way.

Page 12 E.2. o. Sedge wren? Insufficient information provided.

It is necessary for information explaining what “do not anticipate the proposed action to result in a take” means to a lay audience in order for this information to be meaningfully interpreted.

Page 13 E3. h. Insufficient information provided.

The correct name of the Cornell Botanic Gardens does not include the phrase “and Plantations”. Other officially designated and publically accessible local scenic and aesthetic resources, located less than 0.25 miles away, include the Fall Creek Corridor Unique Natural Area, the Monkey Run Unique Natural Area, the Federally designated Fall Creek Wetland, the Cayuga Trail, and the Federally designated “Eligible for Listing on the National Register of Historic Structures” Freese Road bridge. These must be added here.

Full Environmental Assessment Form
Part 1 - Project and Setting

Instructions for Completing Part 1

Part 1 is to be completed by the applicant or project sponsor. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification.

Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information; indicate whether missing information does not exist, or is not reasonably available to the sponsor; and, when possible, generally describe work or studies which would be necessary to update or fully develop that information.

Applicants/sponsors must complete all items in Sections A & B. In Sections C, D & E, most items contain an initial question that must be answered either “Yes” or “No”. If the answer to the initial question is “Yes”, complete the sub-questions that follow. If the answer to the initial question is “No”, proceed to the next question. Section F allows the project sponsor to identify and attach any additional information. Section G requires the name and signature of the project sponsor to verify that the information contained in Part 1 is accurate and complete.

A. Project and Sponsor Information.

Name of Action or Project: Townhomes at Dryden		
Project Location (describe, and attach a general location map): Rt 366 Dryden Road, Ithaca, NY 14850		
Brief Description of Proposed Action (include purpose or need): The project includes construction of a mix of 1, 2, 3 and 4 bedroom multifamily apartment units within 17 townhouse style buildings along with recreation amenities and a private clubhouse. A +/- 2,200 sf retail component, which could include a coffee shop (or similar shop) is also proposed. A total of 428 spaces are to be provided via surface spaces and covered spaces to be used for the residence, retail patrons, community garden and the Varna Trail. The project will incorporate access both to Mt. Pleasant and to Dryden Roads and vehicle circulation through the site is sufficient to accommodate life safety equipment such as fire trucks and ambulances. Two surface Stormwater Management facilities and one underground Stormwater Management Vault to provide quality and quantity control for stormwater. Utilities serving the site include storm, water and sanitary sewer along with electric, phone and cable and no new overhead lines are proposed.		
Name of Applicant/Sponsor: Trinitas Ventures, LLC	Telephone: (317) 507-7142	E-Mail: [REDACTED]
Address: 201 Main Street, Suite 1000		
City/PO: Lafayette	State: IN	Zip Code: 47901
Project Contact (if not same as sponsor; give name and title/role): Hunt Engineers, Architects, Land Surveyors, & Landscape Architects, DPC	Telephone: [REDACTED]	E-Mail: [REDACTED]
Address: 4 Commercial Street Suite 300		
City/PO: Rochester	State: NY	Zip Code: 14614
Property Owner (if not same as sponsor):	Telephone:	E-Mail:
Address:		
City/PO:	State:	Zip Code:

B. Government Approvals

B. Government Approvals, Funding, or Sponsorship. (“Funding” includes grants, loans, tax relief, and any other forms of financial assistance.)

Government Entity	If Yes: Identify Agency and Approval(s) Required	Application Date (Actual or projected)
a. City Council, Town Board, or Village Board of Trustees <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Town Board: Special Use Permit, Site Plan	
b. City, Town or Village Planning Board or Commission <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
c. City Council, Town or Village Zoning Board of Appeals <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ZBA: buffering setback variance	
d. Other local agencies <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
e. County agencies <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
f. Regional agencies <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
g. State agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	NYSDEC: SPDES, Water Qual. Cert., dam permit. DOH: water and sewer. DOT: Utility/driveway	
h. Federal agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	USACE: Disturbance to waters of the US	
i. Coastal Resources. <ul style="list-style-type: none"> i. Is the project site within a Coastal Area, or the waterfront area of a Designated Inland Waterway? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No ii. Is the project site located in a community with an approved Local Waterfront Revitalization Program? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No iii. Is the project site within a Coastal Erosion Hazard Area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 		

C. Planning and Zoning

C.1. Planning and zoning actions.

Will administrative or legislative adoption, or amendment of a plan, local law, ordinance, rule or regulation be the only approval(s) which must be granted to enable the proposed action to proceed? Yes No

- If Yes, complete sections C, F and G.
- If No, proceed to question C.2 and complete all remaining sections and questions in Part 1

C.2. Adopted land use plans.

a. Do any municipally- adopted (city, town, village or county) comprehensive land use plan(s) include the site where the proposed action would be located? Yes No

If Yes, does the comprehensive plan include specific recommendations for the site where the proposed action would be located? Yes No

b. Is the site of the proposed action within any local or regional special planning district (for example: Greenway Brownfield Opportunity Area (BOA); designated State or Federal heritage area; watershed management plan; or other?) Yes No

If Yes, identify the plan(s):

c. Is the proposed action located wholly or partially within an area listed in an adopted municipal open space plan, or an adopted municipal farmland protection plan? Yes No

If Yes, identify the plan(s):

(*** NYSDOT-driveway and utility connection permits, NYSDEC SPDES permit, MS4 permit, NYSDEC sewer extension, NYSDOH water service approval.)

C.3. Zoning

- a. Is the site of the proposed action located in a municipality with an adopted zoning law or ordinance. Yes No
If Yes, what is the zoning classification(s) including any applicable overlay district?
Varna Hamlet Residential District, Varna Hamlet Mixed Use District and Varna Hamlet Traditional District
- b. Is the use permitted or allowed by a special or conditional use permit? Yes No
- c. Is a zoning change requested as part of the proposed action? Yes No
If Yes,
i. What is the proposed new zoning for the site? _____

C.4. Existing community services.

- a. In what school district is the project site located? Ithaca Central School District
- b. What police or other public protection forces serve the project site?
Ithaca Police
- c. Which fire protection and emergency medical services serve the project site?
Dryden Ambulance, Dryden Fire Protection
- d. What parks serve the project site?
Cornell Botanic Gardens and Plantations, Monkey Trail Preserve, Ellis Hollow Nature Preserve

D. Project Details

D.1. Proposed and Potential Development

- a. What is the general nature of the proposed action (e.g., residential, industrial, commercial, recreational; if mixed, include all components)? Multi-family residential with a retail component and clubhouse
- b. a. Total acreage of the site of the proposed action? _____ 16.7 acres
b. Total acreage to be physically disturbed? _____ 13.5 acres
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? _____ 16.7 acres
- c. Is the proposed action an expansion of an existing project or use? Yes No
i. If Yes, what is the approximate percentage of the proposed expansion and identify the units (e.g., acres, miles, housing units, square feet)? % _____ Units: _____
- d. Is the proposed action a subdivision, or does it include a subdivision? Yes No
If Yes,
i. Purpose or type of subdivision? (e.g., residential, industrial, commercial; if mixed, specify types)

ii. Is a cluster/conservation layout proposed? Yes No
iii. Number of lots proposed? _____
iv. Minimum and maximum proposed lot sizes? Minimum _____ Maximum _____
- e. Will proposed action be constructed in multiple phases? Yes No
i. If No, anticipated period of construction: _____ 17 months
ii. If Yes:
 - Total number of phases anticipated _____
 - Anticipated commencement date of phase 1 (including demolition) _____ month _____ year
 - Anticipated completion date of final phase _____ month _____ year
 - Generally describe connections or relationships among phases, including any contingencies where progress of one phase may determine timing or duration of future phases: _____

f. Does the project include new residential uses? Yes No
 If Yes, show numbers of units proposed.

	<u>One Family</u>	<u>Two Family</u>	<u>Three Family</u>	<u>Multiple Family (four or more)</u>
Initial Phase	_____	_____	_____	219
At completion of all phases	_____	_____	_____	219

g. Does the proposed action include new non-residential construction (including expansions)? Yes No
 If Yes,

i. Total number of structures 2
 ii. Dimensions (in feet) of largest proposed structure: 40 height; 30 width; and 72 length
 iii. Approximate extent of building space to be heated or cooled: 2,200 sf (entire building) square feet

h. Does the proposed action include construction or other activities that will result in the impoundment of any liquids, such as creation of a water supply, reservoir, pond, lake, waste lagoon or other storage? Yes No
 If Yes,

i. Purpose of the impoundment: stormwater detention system and infiltration basin
 ii. If a water impoundment, the principal source of the water: Ground water Surface water streams Other specify: stormwater runoff from the project site
 iii. If other than water, identify the type of impounded/contained liquids and their source.

 iv. Approximate size of the proposed impoundment. Volume: 2 million gallons; surface area: 0.8 acres
 v. Dimensions of the proposed dam or impounding structure: 15' height; 220' length
 vi. Construction method/materials for the proposed dam or impounding structure (e.g., earth fill, rock, wood, concrete): compacted earthen fill

D.2. Project Operations

a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both? Yes No
 (Not including general site preparation, grading or installation of utilities or foundations where all excavated materials will remain onsite)
 If Yes:

i. What is the purpose of the excavation or dredging? _____
 ii. How much material (including rock, earth, sediments, etc.) is proposed to be removed from the site?
 • Volume (specify tons or cubic yards): _____
 • Over what duration of time? _____
 iii. Describe nature and characteristics of materials to be excavated or dredged, and plans to use, manage or dispose of them.

 iv. Will there be onsite dewatering or processing of excavated materials? Yes No
 If yes, describe. _____

 v. What is the total area to be dredged or excavated? _____ acres
 vi. What is the maximum area to be worked at any one time? _____ acres
 vii. What would be the maximum depth of excavation or dredging? _____ feet
 viii. Will the excavation require blasting? Yes No
 ix. Summarize site reclamation goals and plan: _____

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment into any existing wetland, waterbody, shoreline, beach or adjacent area? Yes No
 If Yes:

i. Identify the wetland or waterbody which would be affected (by name, water index number, wetland map number or geographic description): USACOE- Jurisdictional Wetlands of approximately 0.5 Acres PEM cover type. The wetland is located within the southern portion of the project site and is unnamed.

ii. Describe how the proposed action would affect that waterbody or wetland, e.g. excavation, fill, placement of structures, or alteration of channels, banks and shorelines. Indicate extent of activities, alterations and additions in square feet or acres:
Excavation, fill and placement of drainage structures, Existing pond will be regraded and dam will likely be reconstructed. Proposed road, parking and retaining walls also to be constructed. Area of disturbance within waterbody/wetland to be approximately 20,000 sq.ft. or 0.46 Ac.

iii. Will proposed action cause or result in disturbance to bottom sediments? Yes No

If Yes, describe: bottom of existing pond will be excavated and culverts installed elsewhere

iv. Will proposed action cause or result in the destruction or removal of aquatic vegetation? Yes No

If Yes:

- acres of aquatic vegetation proposed to be removed: 0.5
- expected acreage of aquatic vegetation remaining after project completion: 0.9
- purpose of proposed removal (e.g. beach clearing, invasive species control, boat access): Stormwater Management and road crossing
- proposed method of plant removal: mechanical removal
- if chemical/herbicide treatment will be used, specify product(s): _____

v. Describe any proposed reclamation/mitigation following disturbance: _____

site will be seeded and stabilized with appropriate mix

c. Will the proposed action use, or create a new demand for water? Yes No

If Yes:

i. Total anticipated water usage/demand per day: +/- 47,250 gallons/day

ii. Will the proposed action obtain water from an existing public water supply? Yes No

If Yes:

- Name of district or service area: Bolton Point Water System
- Does the existing public water supply have capacity to serve the proposal? Yes No
- Is the project site in the existing district? Yes No
- Is expansion of the district needed? Yes No
- Do existing lines serve the project site? Yes No

iii. Will line extension within an existing district be necessary to supply the project? Yes No

If Yes:

- Describe extensions or capacity expansions proposed to serve this project: _____
- Source(s) of supply for the district: _____

iv. Is a new water supply district or service area proposed to be formed to serve the project site? Yes No

If, Yes:

- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- Proposed source(s) of supply for new district: _____

v. If a public water supply will not be used, describe plans to provide water supply for the project: _____

vi. If water supply will be from wells (public or private), maximum pumping capacity: _____ gallons/minute.

d. Will the proposed action generate liquid wastes? Yes No

If Yes:

i. Total anticipated liquid waste generation per day: +/- 47,250 gallons/day

ii. Nature of liquid wastes to be generated (e.g., sanitary wastewater, industrial; if combination, describe all components and approximate volumes or proportions of each): _____

Sanitary Wastewater

iii. Will the proposed action use any existing public wastewater treatment facilities? Yes No

If Yes:

- Name of wastewater treatment plant to be used: Ithaca Area Wastewater Treatment Facility
- Name of district: S2422-Varna Sewer Prime
- Does the existing wastewater treatment plant have capacity to serve the project? Yes No
- Is the project site in the existing district? Yes No
- Is expansion of the district needed? Yes No

<ul style="list-style-type: none"> • Do existing sewer lines serve the project site? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No • Will line extension within an existing district be necessary to serve the project? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>If Yes:</p> <ul style="list-style-type: none"> • Describe extensions or capacity expansions proposed to serve this project: <hr/>	
<p>iv. Will a new wastewater (sewage) treatment district be formed to serve the project site? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes:</p> <ul style="list-style-type: none"> • Applicant/sponsor for new district: _____ • Date application submitted or anticipated: _____ • What is the receiving water for the wastewater discharge? _____ 	
<p>v. If public facilities will not be used, describe plans to provide wastewater treatment for the project, including specifying proposed receiving water (name and classification if surface discharge, or describe subsurface disposal plans):</p> <p>_____</p> <p>_____</p>	
<p>vi. Describe any plans or designs to capture, recycle or reuse liquid waste: _____</p> <p>none _____</p> <p>_____</p>	
<p>e. Will the proposed action disturb more than one acre and create stormwater runoff, either from new point sources (i.e. ditches, pipes, swales, curbs, gutters or other concentrated flows of stormwater) or non-point source (i.e. sheet flow) during construction or post construction? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes:</p> <p>i. How much impervious surface will the project create in relation to total size of project parcel? </p> <p style="padding-left: 20px;">_____ Square feet or 7.9 acres (impervious surface)</p> <p style="padding-left: 20px;">_____ Square feet or 16.7 acres (parcel size)</p> <p>ii. Describe types of new point sources. <u>Roof, Parking Lot, Access Road, sidewalks and SWM facilities.</u></p> <p>iii. Where will the stormwater runoff be directed (i.e. on-site stormwater management facility/structures, adjacent properties, groundwater, on-site surface water or off-site surface waters)?</p> <p><u>On-Site Storm water Management</u></p> <p>_____</p> <ul style="list-style-type: none"> • If to surface waters, identify receiving water bodies or wetlands: _____ _____ • Will stormwater runoff flow to adjacent properties? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 	
<p>iv. Does proposed plan minimize impervious surfaces, use pervious materials or collect and re-use stormwater? <input checked="" type="checkbox"/> Yes <input style="background-color: yellow;" type="checkbox"/> No</p>	
<p>f. Does the proposed action include, or will it use on-site, one or more sources of air emissions, including fuel combustion, waste incineration, or other processes or operations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes, identify:</p> <p>i. Mobile sources during project operations (e.g., heavy equipment, fleet or delivery vehicles)</p> <p>_____</p> <p>ii. Stationary sources during construction (e.g., power generation, structural heating, batch plant, crushers)</p> <p>_____</p> <p>iii. Stationary sources during operations (e.g., process emissions, large boilers, electric generation)</p> <p>_____</p>	
<p>g. Will any air emission sources named in D.2.f (above), require a NY State Air Registration, Air Facility Permit, or Federal Clean Air Act Title IV or Title V Permit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes:</p> <p>i. Is the project site located in an Air quality non-attainment area? (Area routinely or periodically fails to meet ambient air quality standards for all or some parts of the year) <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>ii. In addition to emissions as calculated in the application, the project will generate:</p> <ul style="list-style-type: none"> • _____ Tons/year (short tons) of Carbon Dioxide (CO₂) • _____ Tons/year (short tons) of Nitrous Oxide (N₂O) • _____ Tons/year (short tons) of Perfluorocarbons (PFCs) • _____ Tons/year (short tons) of Sulfur Hexafluoride (SF₆) • _____ Tons/year (short tons) of Carbon Dioxide equivalent of Hydroflouorocarbons (HFCs) • _____ Tons/year (short tons) of Hazardous Air Pollutants (HAPs) 	

h. Will the proposed action generate or emit methane (including, but not limited to, sewage treatment plants, landfills, composting facilities)? Yes No
 If Yes:
 i. Estimate methane generation in tons/year (metric): _____
 ii. Describe any methane capture, control or elimination measures included in project design (e.g., combustion to generate heat or electricity, flaring): _____

i. Will the proposed action result in the release of air pollutants from open-air operations or processes, such as quarry or landfill operations? Yes No
 If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust): _____

j. Will the proposed action result in a substantial increase in **traffic above present levels or generate substantial new demand for transportation facilities or services?** Yes No
 If Yes:
 i. When is the peak traffic expected (Check all that apply): Morning Evening Weekend
 Randomly between hours of _____ to _____.
 ii. For commercial activities only, projected number of semi-trailer truck trips/day: _____
 iii. Parking spaces: Existing **42** Proposed 424 Net increase/decrease +382
 iv. Does the proposed action include any **shared use parking?** Yes No
 v. If the proposed action includes any modification of existing roads, creation of new roads or change in existing access, describe:
The site will be accessible both from Dryden Road (NYS 366) and from Mt. Pleasant. The intersection at Mt. Pleasant will be restricted to right turn egress only.
 vi. Are public/private transportation service(s) or facilities available within 1/2 mile of the proposed site? Yes No
 vii. Will the proposed action include access to public transportation or accommodations for use of hybrid, electric or other alternative fueled vehicles? Yes No
 viii. Will the proposed action include plans for pedestrian or bicycle accommodations for connections to existing pedestrian or bicycle routes? Yes No

k. Will the proposed action (for commercial or industrial projects only) generate new or additional demand for energy? Yes No
 If Yes:
 i. Estimate annual electricity demand during operation of the proposed action: _____
 ii. Anticipated sources/suppliers of electricity for the project (e.g., on-site combustion, on-site renewable, via grid/local utility, or other): _____
 iii. Will the proposed action require a new, or an upgrade to, an existing substation? Yes No

l. Hours of operation. Answer all items which apply.
 i. During Construction:
 • Monday - Friday: _____ 7 am to 6 pm
 • Saturday: _____ 10 am to 6 pm
 • Sunday: _____ 12 pm to 4 pm
 • Holidays: _____ 10 am to 6 pm
 ii. During Operations:
 • Monday - Friday: _____ 8 am to 5 pm
 • Saturday: _____ 10 am to 4 pm
 • Sunday: _____ 12 pm to 4 pm
 • Holidays: _____ scarce or non-existent

The clubhouse will be operating 24 hours during operations with controlled access after hours.
 The maintenance will be on call 24/7 for emergencies and will be available on-site during the weekends for any repairs to the pool.

m. Will the proposed action produce noise that will exceed existing ambient noise levels during construction, operation, or both? Yes No

If yes:

i. Provide details including sources, time of day and duration:
 Noise levels to increase during times of construction activity and then return to ambient noise levels during operation.

ii. Will proposed action remove existing natural barriers that could act as a noise barrier or screen? Yes No
 Describe: Tree removal required for development; however landscaping will be installed as necessary to provide screening.

n.. Will the proposed action have outdoor lighting? Yes No

If yes:

i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures:
 Light pole fixtures, various locations through parking areas, access drive, between 16-25 ft in height, aimed toward areas of site travel.
 Proposing LED and night-sky compliant lighting to reduce any impacts.

ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen? Yes No
 Describe: Minimal tree removal requires for development; however landscaping will be installed as necessary to provide screening.

o. Does the proposed action have the potential to produce odors for more than one hour per day? Yes No
 If Yes, describe possible sources, potential frequency and duration of odor emissions, and proximity to nearest occupied structures:

p. Will the proposed action include any bulk storage of petroleum (combined capacity of over 1,100 gallons) or chemical products 185 gallons in above ground storage or any amount in underground storage? Yes No

If Yes:

i. Product(s) to be stored _____

ii. Volume(s) _____ per unit time _____ (e.g., month, year)

iii. Generally describe proposed storage facilities: _____

q. Will the proposed action (commercial, industrial and recreational projects only) use pesticides (i.e., herbicides, insecticides) during construction or operation? Yes No

If Yes:

i. Describe proposed treatment(s):

ii. Will the proposed action use Integrated Pest Management Practices? Yes No

r. Will the proposed action (commercial or industrial projects only) involve or require the management or disposal of solid waste (excluding hazardous materials)? Yes No

If Yes:

i. Describe any solid waste(s) to be generated during construction or operation of the facility:

- Construction: _____ tons per _____ (unit of time)
- Operation : _____ tons per _____ (unit of time)

ii. Describe any proposals for on-site minimization, recycling or reuse of materials to avoid disposal as solid waste:

- Construction: _____
- Operation: _____

iii. Proposed disposal methods/facilities for solid waste generated on-site:

- Construction: _____
- Operation: _____

s. Does the proposed action include construction or modification of a solid waste management facility? Yes No
 If Yes:
 i. Type of management or handling of waste proposed for the site (e.g., recycling or transfer station, composting, landfill, or other disposal activities): _____
 ii. Anticipated rate of disposal/processing:
 • _____ Tons/month, if transfer or other non-combustion/thermal treatment, or
 • _____ Tons/hour, if combustion or thermal treatment
 iii. If landfill, anticipated site life: _____ years

t. Will proposed action at the site involve the commercial generation, treatment, storage, or disposal of hazardous waste? Yes No
 If Yes:
 i. Name(s) of all hazardous wastes or constituents to be generated, handled or managed at facility: _____

 ii. Generally describe processes or activities involving hazardous wastes or constituents: _____

 iii. Specify amount to be handled or generated _____ tons/month
 iv. Describe any proposals for on-site minimization, recycling or reuse of hazardous constituents: _____

 v. Will any hazardous wastes be disposed at an existing offsite hazardous waste facility? Yes No
 If Yes: provide name and location of facility: _____

 If No: describe proposed management of any hazardous wastes which will not be sent to a hazardous waste facility:

E. Site and Setting of Proposed Action

E.1. Land uses on and surrounding the project site

a. Existing land uses.
 i. Check all uses that occur on, adjoining and near the project site.
 Urban Industrial Commercial Residential (suburban) Rural (non-farm)
 Forest Agriculture Aquatic Other (specify): _____
 ii. If mix of uses, generally describe:
 Residential, Mixed Use and Traditional

b. Land uses and coverytypes on the project site.

Land use or Coverytype	Current Acreage	Acreage After Project Completion	Change (Acres +/-)
• Roads, buildings, and other paved or impervious surfaces	1.2	7.9	+ 6.7
• Forested	0.0	0.0	0.0
• Meadows, grasslands or brushlands (non-agricultural, including abandoned agricultural)	14.9	7.95	- 6.95
• Agricultural (includes active orchards, field, greenhouse etc.)	0.0	0.0	0.0
• Surface water features (lakes, ponds, streams, rivers, etc.)	0.1	0.1	0.0
• Wetlands (freshwater or tidal)	0.5	0.75	+0.24
• Non-vegetated (bare rock, earth or fill)	0.0	0.0	0.0
• Other Describe: _____ _____			

c. Is the project site presently used by members of the community for public recreation? Yes No
i. If Yes: explain: _____

d. Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? Yes No
If Yes,
i. Identify Facilities:
Cornell University, Varna Community Association, Inc.

e. Does the project site contain an existing dam? Yes No
If Yes:
i. Dimensions of the dam and impoundment:
• Dam height: _____ 15 feet
• Dam length: _____ 180 feet
• Surface area: _____ 0.5 acres
• Volume impounded: _____ 1.6M gallons OR acre-feet
ii. Dam's existing hazard classification: "A" or "low hazard"
iii. Provide date and summarize results of last inspection:
Dam was inspected 6/23/98 by NYSDEC Div. of Water and found to be in need of repairs. Specifically, the existing earthen berm was though to be poorly constructed. Deficiencies of the embankment and the blow out at the control structure were noted and remedial measures recommended.

f. Has the project site ever been used as a municipal, commercial or industrial solid waste management facility, or does the project site adjoin property which is now, or was at one time, used as a solid waste management facility? Yes No
If Yes:
i. Has the facility been formally closed? Yes No
• If yes, cite sources/documentation: _____
ii. Describe the location of the project site relative to the boundaries of the solid waste management facility:

iii. Describe any development constraints due to the prior solid waste activities: _____

g. Have hazardous wastes been generated, treated and/or disposed of at the site, or does the project site adjoin property which is now or was at one time used to commercially treat, store and/or dispose of hazardous waste? Yes No
If Yes:
i. Describe waste(s) handled and waste management activities, including approximate time when activities occurred:

h. Potential contamination history. Has there been a reported spill at the proposed project site, or have any remedial actions been conducted at or adjacent to the proposed site? Yes No
If Yes:
i. Is any portion of the site listed on the NYSDEC Spills Incidents database or Environmental Site Remediation database? Check all that apply: Yes No
 Yes – Spills Incidents database Provide DEC ID number(s): _____
 Yes – Environmental Site Remediation database Provide DEC ID number(s): _____
 Neither database
ii. If site has been subject of RCRA corrective activities, describe control measures: _____

iii. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? Yes No
If yes, provide DEC ID number(s): _____
iv. If yes to (i), (ii) or (iii) above, describe current status of site(s): _____

v. Is the project site subject to an institutional control limiting property uses? Yes No

- If yes, DEC site ID number: _____
- Describe the type of institutional control (e.g., deed restriction or easement): _____
- Describe any use limitations: _____
- Describe any engineering controls: _____
- Will the project affect the institutional or engineering controls in place? Yes No
- Explain: _____

E.2. Natural Resources On or Near Project Site

a. What is the average depth to bedrock on the project site? _____ >25' feet

b. Are there bedrock outcroppings on the project site? Yes No
 If Yes, what proportion of the site is comprised of bedrock outcroppings? _____ %

c. Predominant soil type(s) present on project site:

Hudson Silty Clay Loam	_____	31.9 %
Darien Gravely Silt Loam	_____	19.1 %
Rhinebeck Silt Loam	_____	17.4 %

d. What is the average depth to the water table on the project site? Average: _____ >25' feet

e. Drainage status of project site soils: Well Drained: 21.3 % of site
 Moderately Well Drained: 31.9 % of site
 Poorly Drained: 46.8 % of site

f. Approximate proportion of proposed action site with slopes: 0-10%: 64.9 % of site
 10-15%: 17.4 % of site
 15% or greater: 17.7 % of site

g. Are there any unique geologic features on the project site? Yes No
 If Yes, describe: _____

h. Surface water features.

i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)? Yes No

ii. Do any wetlands or other waterbodies adjoin the project site? Yes No
 If Yes to either i or ii, continue. If No, skip to E.2.i.

iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency? Yes No

iv. For each identified regulated wetland and waterbody on the project site, provide the following information:

- Streams: Name none Classification _____
- Lakes or Ponds: Name wetland - see below Classification _____
- Wetlands: Name Unnamed Approximate Size 0.51
- Wetland No. (if regulated by DEC) _____

v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies? Yes No
 If yes, name of impaired water body/bodies and basis for listing as impaired: _____

i. Is the project site in a designated Floodway? Yes No

j. Is the project site in the 100 year Floodplain? Yes No

k. Is the project site in the 500 year Floodplain? Yes No

l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer? Yes No
 If Yes:
 i. Name of aquifer: _____

m. Identify the predominant wildlife species that occupy or use the project site:	<table style="width: 100%; border: none;"> <tr> <td style="border: none;">Deer _____</td> <td style="border: none;">rabbits _____</td> <td style="border: none;">squirrels _____</td> </tr> <tr> <td style="border: none;">birds _____</td> <td style="border: none;">turtles _____</td> <td style="border: none;">frogs _____</td> </tr> </table>	Deer _____	rabbits _____	squirrels _____	birds _____	turtles _____	frogs _____
Deer _____	rabbits _____	squirrels _____					
birds _____	turtles _____	frogs _____					
n. Does the project site contain a designated significant natural community? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes:							
<i>i.</i> Describe the habitat/community (composition, function, and basis for designation): _____ _____							
<i>ii.</i> Source(s) of description or evaluation: _____							
<i>iii.</i> Extent of community/habitat:							
<ul style="list-style-type: none"> • Currently: _____ acres • Following completion of project as proposed: _____ acres • Gain or loss (indicate + or -): _____ acres 							
o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
The NYSDEC has identified the subject property to lie within habitat known to have or support a threatened or endangered species (Sedge Wren) . NYSDEC Staff has evaluated the project and concluded that they do not anticipate the proposed action to result in a take.							
p. Does the project site contain any species of plant or animal that is listed by NYS as rare, or as a species of special concern? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, give a brief description of how the proposed action may affect that use: _____ _____							
E.3. Designated Public Resources On or Near Project Site							
a. Is the project site, or any portion of it, located in a designated agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, provide county plus district name/number: _____							
b. Are agricultural lands consisting of highly productive soils present? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>i.</i> If Yes: acreage(s) on project site? <u>2.4</u> <i>ii.</i> Source(s) of soil rating(s): <u>NYS Agricultural Land Classification System</u>							
c. Does the project site contain all or part of, or is it substantially contiguous to, a registered National Natural Landmark? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes:							
<i>i.</i> Nature of the natural landmark: <input type="checkbox"/> Biological Community <input type="checkbox"/> Geological Feature <i>ii.</i> Provide brief description of landmark, including values behind designation and approximate size/extent: _____ _____ _____							
d. Is the project site located in or does it adjoin a state listed Critical Environmental Area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes:							
<i>i.</i> CEA name: _____ <i>ii.</i> Basis for designation: _____ <i>iii.</i> Designating agency and date: _____							

e. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on, or has been nominated by the NYS Board of Historic Preservation for inclusion on, the State or National Register of Historic Places? Yes No

If Yes:

i. Nature of historic/archaeological resource: Archaeological Site Historic Building or District

ii. Name: _____

iii. Brief description of attributes on which listing is based: _____

f. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory? Yes No

g. Have additional archaeological or historic site(s) or resources been identified on the project site? Yes No

If Yes:

i. Describe possible resource(s): _____

ii. Basis for identification: _____

h. Is the project site within five miles of any officially designated and publicly accessible federal, state, or local scenic or aesthetic resource? Yes No

If Yes:

i. Identify resource: Cornell Botanic Gardens and Plantations

ii. Nature of, or basis for, designation (e.g., established highway overlook, state or local park, state historic trail or scenic byway, etc.): Local Park

iii. Distance between project and resource: 0.5 miles.

i. Is the project site located within a designated river corridor under the Wild, Scenic and Recreational Rivers Program 6 NYCRR 666? Yes No

If Yes:

i. Identify the name of the river and its designation: _____

ii. Is the activity consistent with development restrictions contained in 6NYCRR Part 666? Yes No

F. Additional Information

Attach any additional information which may be needed to clarify your project.

If you have identified any adverse impacts which could be associated with your proposal, please describe those impacts plus any measures which you propose to avoid or minimize them.

G. Verification

I certify that the information provided is true to the best of my knowledge.

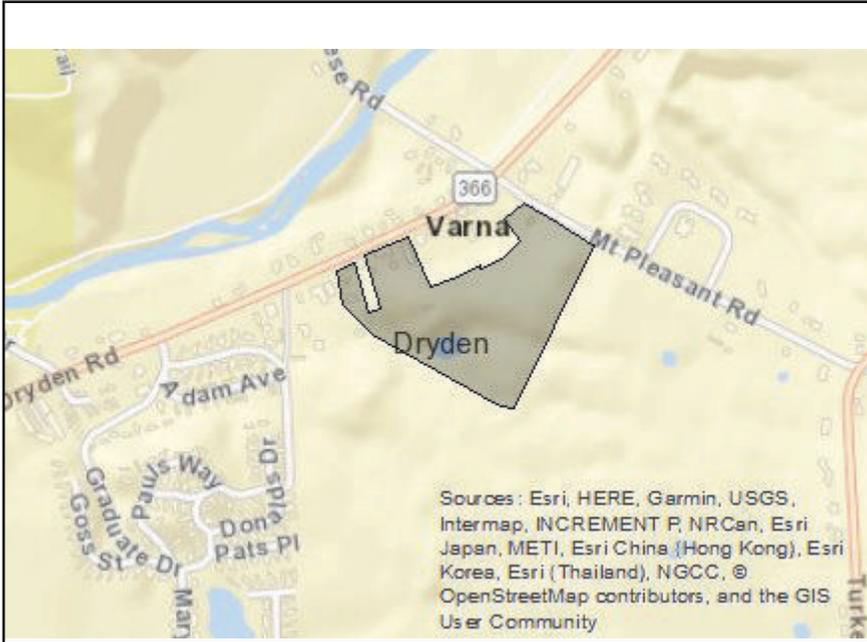
Applicant/Sponsor Name Michael B. Keith

Date 10/25/18

Signature Michael B. Keith

Title Engineer of Record

PRINT FORM



Disclaimer: The EAF Mapper is a screening tool intended to assist project sponsors and reviewing agencies in preparing an environmental assessment form (EAF). Not all questions asked in the EAF are answered by the EAF Mapper. Additional information on any EAF question can be obtained by consulting the EAF Workbooks. Although the EAF Mapper provides the most up-to-date digital data available to DEC, you may also need to contact local or other data sources in order to obtain data not provided by the Mapper. Digital data is not a substitute for agency determinations.



B.i.i [Coastal or Waterfront Area]	No
B.i.ii [Local Waterfront Revitalization Area]	No
C.2.b. [Special Planning District]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h [DEC Spills or Remediation Site - Potential Contamination History]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.i [DEC Spills or Remediation Site - Listed]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.i [DEC Spills or Remediation Site - Environmental Site Remediation Database]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.iii [Within 2,000' of DEC Remediation Site]	No
E.2.g [Unique Geologic Features]	No
E.2.h.i [Surface Water Features]	No
E.2.h.ii [Surface Water Features]	Yes
E.2.h.iii [Surface Water Features]	Yes - Digital mapping information on local and federal wetlands and waterbodies is known to be incomplete. Refer to EAF Workbook.
E.2.h.v [Impaired Water Bodies]	No
E.2.i. [Floodway]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.2.j. [100 Year Floodplain]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.2.k. [500 Year Floodplain]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.2.l. [Aquifers]	No
E.2.n. [Natural Communities]	No
E.2.o. [Endangered or Threatened Species]	No

E.2.p. [Rare Plants or Animals]	No
E.3.a. [Agricultural District]	No
E.3.c. [National Natural Landmark]	No
E.3.d [Critical Environmental Area]	No
E.3.e. [National Register of Historic Places]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.3.f. [Archeological Sites]	No
E.3.i. [Designated River Corridor]	No

David Weinstein
51 Freese Road
Ithaca, NY 14850

Dec 17, 2018

Dear Dryden Town Board,

The following letter is a detailed response to each point made by Kimberly Hansen of Trinitas Ventures in her letter to you of Oct 23rd, 2018, in which she attempts to meet the Town Board's condition that Trinitas demonstrate how they are in compliance with the Varna Community Development Plan (Varna Plan) of 2012.

In sum, Trinitas did not make any reasonable argument that they have complied with the Varna Plan. As they have throughout this discussion over the past year, Trinitas has made little attempt to acknowledge the goals identified in the Plan, and have once again tried to pick and choose little bits of words here and there that they thought they could frame into a statement of compatibility with the Plan.

Below are details of how Trinitas has failed to meet the condition set by the Town Board.

1. Trinitas Statement: "As described in the Plan, the subject site, commonly known as Varna II, LLC, for the proposed Village at Varna is recognized as one of two primary underutilized sites listed as "Development Opportunities" within the Hamlet of Varna due to the site's proximity to major roads and existing infrastructure (p.19)."

Critique: By recognizing the site as a primary "Development Opportunity", the Plan in no way was indicating that any and all development proposed for this site was acceptable and welcomed. The rest of the Plan goes to great lengths to spell out the kind, magnitude, and scale of developments the community is looking for. The Trinitas letter specifically avoids addressing how their development proposal for this underutilized area helps the community meet the rest of its articulated goals that "the character of the community is maintained or shifts slowly, not in dramatic steps" (page 40), balance between home ownership and rental, "encouraging home ownership" (page 40), maintenance of rural character that "reflects the rural, pastoral feel of the hamlet" (page 46), etc.

The incorrect implication is that if Dryden does not jump at whatever development proposal is put on the table for this underutilized site, it is not in keeping with the Plan. This notion is completely wrong. The community and the town went to great lengths with the creation of this Plan to identify many specifics about the type of development it is seeking. Nowhere does the Plan state that it is critical to accept any and all proposals to fill the underutilized sites as quickly as possible to keep the community in a good state of health.

2. Trinitas Statement: "Furthermore, the Plan's Summary of Existing Conditions notes that these underutilized sites when developed can incorporate public green spaces that "cater to a family and student community" (p. 20)."

Critique: Trinitas has made minimal effort to create public green space within the development. With 47.3% impervious surface and not achieving the minimum green space requirement (see below), Trinitas cannot claim to have made an effort to produce green space. Their offerings consist of (1) a playground

that unnecessarily duplicates one that already exists nearby at the Varna Community Center, one that the community has already invested heavily in, and (2) a community garden that unnecessarily duplicates the community garden on Freese Road that already is available for anyone to use. In order for these facilities to be considered benefits to the community, Trinitas would have needed to conduct a survey to see how many people of the community find the current playground and community garden too inconvenient, and would utilize the new playground and garden. Without doing this assessment, Trinitas has no business advertising these as community benefits. In fact, if the garden plot is as underutilized as it might be, it would turn easily into more of a net eyesore to the community than a benefit.

An easement for one-half of the trail has already been granted by the current owner, so that, too, cannot be counted as evidence of Trinitas' going out of their way to provide needed benefits to the community.

The Varna Plan statement of wanting green spaces that "cater to a family and student community" is being interpreted by Trinitas as a welcoming invitation for a large student-dominated development. The Plan indicates that students are welcome as part of our community as a part of a well-mixed environment containing home-owners, families, students, professionals, retirees, etc. A proposal to introduce an enormous student population that will then dominate the rest of these groups runs completely counter to the message the plan conveys.

For Trinitas to claim that plenty of families will be willing to live in the midst of an overwhelmingly student-dominated environment, it needed to provide evidence from other comparable developments that this has happened. No effort to provide this evidence has been made by Trinitas, and we can only speculate as to why, especially since they have indicated throughout their discussions that their primary target for their development is 18 to 24-year-olds.

3. Trinitas Statement: "Trinitas has put considerable effort into site design to ensure green space is maximized to over sixty percent of available land and public access to green space amenities is readily available. These design items include: public trail access and parking along Mt. Pleasant Road for the Varna Trail,"

Critique: Providing 60% of the site as green space is a requirement, not a demonstration of the interest by Trinitas in adding to the community's rural open-space character. Further, Trinitas was able to meet this goal (by their calculation) only by claiming that 1800 linear feet of sidewalk that winds through the project, connecting parking lots to its buildings, is trail access because the last several hundred feet connect the upper buildings and parking lots to the trail.

In point of fact, Trinitas indicates that 47.3% of the parcel will be impervious surface, leaving only 52.7% as non-impervious, what most of us think of as "green space". This does not demonstrate an interest in preserving the community's rural open-space character.

4. Trinitas Statement: "creation of a community garden with pedestrian access available to all Varna residents,"

Critique: As I mentioned above, their proposed community garden unnecessarily duplicates the availability residents already have to a community garden on Freese Road. That garden is already manured, plowed, and disked each year by Cornell for free for the community. Trinitas has provided no

plan for providing these services for their proposed garden plot, and without these services this plot is likely to turn into an underutilized eyesore.

Trinitas would have needed to conduct a survey to see how many people of the community find the community garden too inconvenient and would consequently utilize the new garden. Without doing this assessment, Trinitas cannot advertise these as community benefits.

5. Trinitas Statement: “construction of a pocket playground along Varna Trail, and proposed dedication of land across Route 366 for a future park adjacent to Fall Creek.”

Critique: As I mentioned above, the pocket playground unnecessarily duplicates a large playground that already exists nearby at the Varna Community Center, one that the community has already invested heavily in and one the community wants to see continued to be heavily used. The dedication of land for a future park is a questionable benefit since it, too, duplicates a nearby public park next to Fall Creek (Park Park, maintained by the Cornell Botanic Garden and open to the public), and since the development of such a park will depend on funds being available from the town, not Trinitas.

6. Trinitas Statement: “In addition to this focus on green amenities, Trinitas has incorporated many of the development characteristics noted in the example communities outlined as “Types of Development the Community Liked” into the design for the Village at Varna (p.27). Specifically, similarities in design can be found between the Village at Varna and all four of the communities outlined in the Plan.”

Critique: Claiming that the Trinitas 219-unit townhouse development, at 13.1 units per acre is similar and should be considered the same as the examples of “Types of Development the Community Liked” shown in the Plan on pages 27-30 makes no sense. These examples of development the community favored consist of (1) townhouses on Forest Home drive, with 20 units at 8 units per acre, (2) townhouses in Varna Hollow with 90 units at 6 units per acre, (3) cottage homes and townhouses on Varna Commons with 50 units at 8 units per acre, and (4) single family homes with a few townhouses on Trailside with 90 units at 10 units per acre. None of them approach either the size and density of Trinitas. Further, none of these examples has more than 6 units per building, while Trinitas has buildings with 28 units, 26, 24, 15, 12, 12, etc.

7. Trinitas Statement: “For example, Trinitas has utilized similar townhome design as seen in the “Forest Home Drive” and “Varna Commons” communities.”

Critique: As indicated above, there is a vast difference between the townhome design shown in these examples where no building contains more than 6 units, and those long linear buildings of Trinitas with 28 units, 26, 24, 15, 12, 12, etc., and without the staggered townhouse design shown in Varna Hollow or the small buildings of Forest Home Drive, or the mixtures of professional office, cottages, and townhouses shown in Varna Commons.

Further, although unfortunately our zoning does not define “townhouse”, the common understanding of the term in which a single townhouse goes from ground level to roof is in sharp contrast to the concept being proposed by Trinitas. Trinitas defines townhouses as two apartments, a flat at ground level and a multi-story apartment above. Further, almost all common definitions of “townhouse” identify it as a single residence that shares walls with other residences. No mention is made of sharing floors. In fact,

most definitions indicate that adjacent townhouses are owned by different people.

8. Trinitas Statement: “These townhomes will provide additional housing options to Varna capable of serving multiple populations including families, seniors, young professionals, and students, as is desired in the "Varna Hollow" design.”

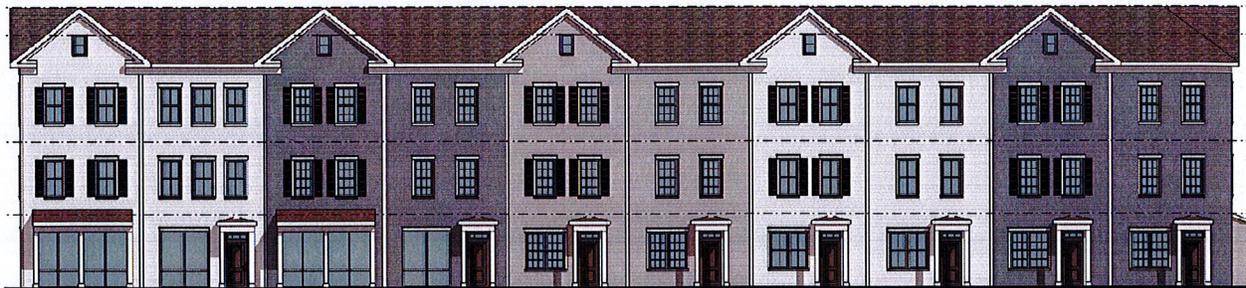
Critique: While it is a nice goal to house a mixed diversity with substantial numbers of each of these multiple populations together, the town must require Trinitas to demonstrate a desire and a mechanism for attracting each of these to live there. For Trinitas to claim that plenty of families will be willing to live in the midst of an overwhelmingly student dominant environment, it needs to provide evidence from other comparable developments that this has happened. No effort to provide this evidence has been made by Trinitas. Without a distinct and viable plan to make this happen, the overwhelming likelihood is that this development will be almost entirely populated by students, who, it can be seen elsewhere, often make it uncomfortable for a family with children to reside in their midst.

9. Trinitas Statement: “In addition, accessible footpaths to connect Route 366 to Varna Trail will exist onsite as was encouraged in the "Trailside" development.”

Critique: Trinitas is providing accessible footpaths from two of the parking lots to the Varna Trail. However, it is not reasonable for them to claim that sidewalks that go to the buildings and parking lots, with an addition part that connects to the trail, should be considered a connector from Rt 366 to the Varna trail. There are other more easily used access points, such as off of Mt Pleasant Rd and the trail behind the Varna Community Center to Hillside Acres that will have a short extension to connect to the trail.

10. Trinitas Statement: “Lastly, care has been taken in ensuring the architectural design of the community fits in well with the character of the existing structures currently located in the Hamlet.”

Critique: The Varna Guidelines for Development state clearly that long linear features, “cookie cutter” repetition, mass buildings, and extensive parking lots should be avoided (page 8). Unfortunately, these features are exactly what is being proposed, with variation largely being created only by slight paint variation (see figure below).



BUILDING 3 - FRONT ELEVATION

The guidelines call for varying lot frontages and depths within each streetscape to maintain the hamlet's random lot pattern.

Further, the guidelines state that it is important to preserve and incorporate existing buildings into new

development when possible. Existing, character-establishing structures should be incorporated into development plans, and/or adaptively reused, where feasible. The guidelines say to retain key facade features of existing buildings (e.g. windows, trim, ornamental details, doors). No attempt to keep existing buildings is being done; they will all be torn down.

The Guidelines indicate that buildings and public spaces should be proportional to pedestrians, as well as the buildings around them. The typical building in this part of Varna is 2 stories high. Even though the Trinitas proposes having building height right up to the maximum building height in the Guidelines of 40 feet in height, but not more than that, the proposal violates the Guideline that buildings should be no more than three stories by having buildings that contain 4 stories (see figure below).



BUILDING 11 - BACK ELEVATION

The Guidelines state “Maintain a mix of housing types of different historic styles to retain the architectural feel of the hamlet.” This development guarantees that the architectural feel of housing diversity within the hamlet will be lost.

11. Trinitas Statement: “The site plan complies with the Varna Community Development Plan adopted December 2012.”

Critique: Below are listed all of the additional ways that the Trinitas proposal continues to conflict with the Varna Plan and therefore contradicts the above statement made by Trinitas.

ADDITIONAL CONFLICTS BETWEEN THE TRINITAS PROPOSAL AND THE VARNA PLAN

1) The Varna Plan cites among its most important goals, “regulating hamlet transformations so that the character of the community is maintained or shifts slowly, not in dramatic steps” (page 40).

The Trinitas proposal violates this goal by a near-doubling of the population of Varna overnight. This intensity of growth through one development is a very drastic, sudden, and dramatic step.

2) The Varna Plan mentions in many places that maintaining and protecting the character of the hamlet is the highest priority, including such statements as “many of the very specific recommendations have to do directly with continuing the character of a hamlet as described here” (page 40). The Trinitas proposal shows no appreciation of the current character of the hamlet as described in the Varna Plan, and offers no steps to ensure that the character will be continued.

The Trinitas proposal consists of:

- a) a series of long massive linear buildings;
- b) three times the density
- c) "cookie cutter" repetition,
- d) few housing types with little to distinguish one unit from another other than paint,
- e) little variety in setbacks and general design,
- f) extensive parking lots buildings,
- g) surrounded by an area consisting of 47.3% impervious surface,
- h) structures that are built too tall so that they reduce pedestrian's sense of security, and
- i) without buildings that are proportionate to people.

Most of these items are precisely the features that the Varna Design Guidelines warns against because they do not continue hamlet character.

In contrast, the hamlet character surrounding this project consists of, among other characteristics,

- a) 1/3rd the density,
- b) varied setbacks,
- c) small buildings containing no more than 6 attached units,
- d) rural open-space character
- e) buildings that are proportionate to people to maintain the intimate feel of the hamlet.

Nothing in the wealth of documents they have provided mentions the goals of maintaining a sense of rural community, of keeping the feeling of an open distribution of building so you can see the natural green landscape beyond, of striving for a mixture of income levels and a mixture of housing type opportunities.

3) The first goal of the Varna Plan is to "Protect and enhance hamlet character" (page 34), and in particular to "utilize existing infrastructure to potential without degrading or changing overall character" (page 34).

The Plan clearly states, "The primary purpose of this plan is to find the means for encouraging redevelopment and new development in the hamlet, but in a way that compliments, continues and improves upon the current character" (page 37).

The character of Varna is defined as described in (2) above, and the Plan adds to this description by indicating that the Varna hamlet, like other hamlets, "has a defined boundary and you can often see the surrounding open space from almost any point in the hamlet area; there is no street pattern or grid, and buildings are arranged linearly along a main road with one or more crossroads. The buildings are well spaced lending to a feeling of openness, and there is a mix of uses scattered along the roadway" (page 36).

The Trinitas proposal does not have buildings that are well-spaced, and therefore do not lend to a feeling of openness. Further, the Trinitas proposal does not allow site lines where the surrounding open space can be seen from almost any point. Consequently, instead of maintaining the elements of the hamlet character, it deteriorates that character.

4) The Varna Plan's Goal #3 is to "protect and improve the quality of life in the hamlet" (page 35). The objectives for reaching this goal included:

☞ "Identify limits of development relative to traffic, bulk and density of buildings" (page 35).

☞ "Create landscape standards that are in keeping with a relaxed, quaint country hamlet i.e. low maintenance, basic landscape standards" (page 35).

A nearly doubling of the population of Varna in one project is not a recipe for "standards that are in keeping with a relaxed, quaint country hamlet".

5) The Varna Plan cites among its goals, "encouraging home ownership". The Trinitas proposal does not encourage home ownership, but instead removes a parcel from potential development that the Plan identified as an opportunity to add a community of single-family homes in a Traditional Neighborhood Design arrangement.

6) In the Dryden Zoning Law, Section 701: Design Guidelines and Standards: it states, "All development and re-development of Lots and property in Varna shall comply with the Varna Design Guidelines and Landscape Standards". The Guidelines (page 8) state, "Maximum building height for buildings should be no more than three stories and 40 feet in height". The Trinitas Plan, with a building façade that clearly appears to be 4 stories tall, is in conflict with both the Design Guidelines and the Dryden Zoning Law.

7) In the Varna Plan, in Buildings and Form Recommendations (pg. 69), it states, "Each new house or townhouse should face open, green space to encourage healthy, active living that is consistent with the existing character of the hamlet."

In the Trinitas Improvement-Site-plan, almost all of the buildings face a parking lot, and almost none of the buildings face substantial open, green spaces. Almost all of these parking lots do not have so much as a small bit a green center median.

8) The Varna Design Guidelines & Landscape Standards, page 2) states that, "despite physical appearance, the character of Varna is defined by a variety of building and lot forms, patterns, and configurations which contribute to the resident's sense of community". "Unlike conventional developments, hamlets typically retain housing and development patterns similar to many nineteenth-century neighborhoods—unintentional varying lot sizes and setbacks. Common hamlet characteristics include a commons or central green, dominant civic/institutional buildings (such as a church, court house, etc.), with predominantly single-family residential homes and limited mixed-use buildings adjacent to the community center."

In the Trinitas Site plan", there is none of the variety of buildings and patterns, with the exception of the smaller U-shaped area on the most southerly corner of the parcel. The Trinitas proposal contains almost no single-family residential homes, completely upsetting any efforts to bring the hamlet back to a reasonable mix of single-family homes and rental apartments.

9) The Varna Plan presents an example of a development the community liked on the parcel on which

Trinitas seeks to place 219 student townhouse/apartments. Pictured in the Varna Plan (page 28) are approximately 90 "single-family home development with townhomes at 10 du/acre". The emphasis of this site design is single-family homes with alleyways so that each building fronts green space. This type of development is commonly referred to as Traditional Neighborhood Design (TND)", and would include a variety of single-family houses, with a small amount of townhouses and duplexes, "to create quaint neighborhoods that fit into the landscape" (page 69).

The Trinitas proposal ignores following any aspect of this example, with the exception of the townhouses. They propose to develop the site at a higher density and a number of units more than double of that pictured.

10) The Varna Plan describes the character of Varna as "a quaint rural suburb" that "affords a quality of life that has kept many residents in the area for years, while attracting new families, professionals and students" (page 31).

The Trinitas proposal seeks to provide housing nearly exclusively for students. As mentioned above, the Plan welcomes students as a part of the community, not an overwhelming majority of the community.

11) In the Varna Plan, it states as a goal to, "allow growth to occur in such a way where building footprints, new uses and amenities fit in to the existing fabric of Varna" (page 31). It further states, "... the general plan is to find the means for encouraging redevelopment and new development in the hamlet, but in a way that compliments and continues the current character" (page 66).

The Trinitas proposal fails to demonstrate how any aspect of its development fits into the existing fabric of Varna. It proposes development that neither compliments nor continues the current character. Trinitas' idea, as presented in their proposal, is that all that is needed to compliment the current character of the hamlet is to have wood-like horizontal-slatted exterior siding and a peaked dormer over the entry way. The architectural and landscape character of the current hamlet is much more than that.

12) The Varna Plan states that, in referring to specific zoning controls involving regulating the bulk and area requirements of a site, "These controls should still be a minimum standard, something that the development community should seek to not only meet, but to exceed in form and character and performance" (page 43).

The Trinitas proposal attempts only to meet the minimum bulk and area requirements, with no effort to exceed these minimums in either protecting local character or performance.

13) Although the Trinitas proposal offers a small amount of commercial space, and in the Varna community "there was also a desire for the return of some local services that did not require using the automobile", the Varna Plan specifically indicates that the hamlet does not need additional population in order to support these services should a developer seek to provide them. It states, "Fortunately, Varna has the population to support such services to a limited extent, which is subsidized by the higher traffic counts on Route 366" (page 66).

Therefore, any claim that Trinitas might make that it is only through this density of development that Varna can meet its stated desire for a return of some local services is incorrect. The Plan indicates that between current population and the high traffic counts, Varna can already meet this need.

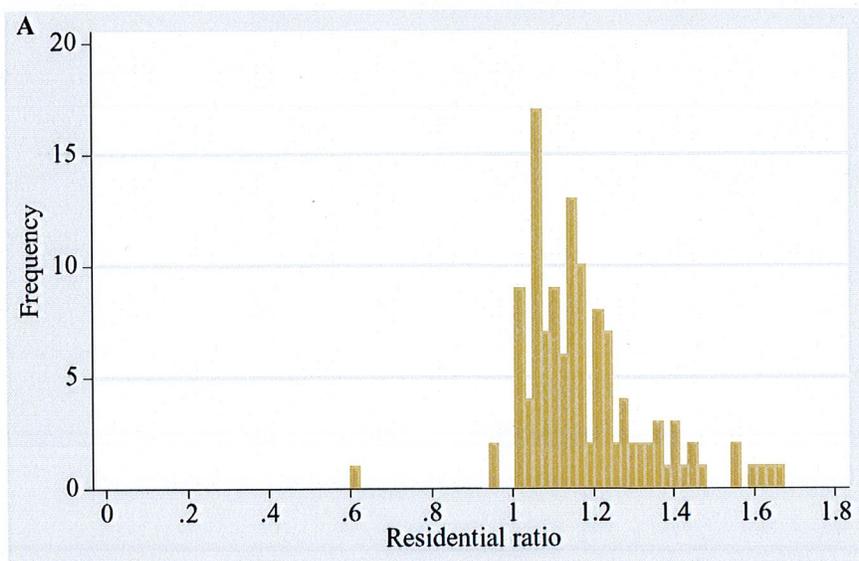
14) Finally, the Trinitas proposal fails to acknowledge the widely-verified scientific finding that residential developments such as this one are very likely to cost the taxpayers of Dryden money for road repair, added police, fire, and emergency services, etc. A recent review of such developments throughout the United States found only 3 communities of the 125 studied in which municipal expenditures by the community were less than the amount brought in through revenue. (Kotche, M.J., and S. L. Schulte. 2009. A Meta-Analysis of Cost of Community Service Studies, International Regional Science Review, Volume 32 Number 3: 376-399).

Here is the results table from their review of 125 communities from a wide variety of community types. The average community had to spend 20% more funds than they received from revenue of residential projects, and for some communities, 70% more.

Given this likely high cost to taxpayers of Dryden, Trinitas must be required to demonstrate how this high cost will be worth the taxpayers of the town subsidizing the development.

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Figure 2
Frequency Distributions of Cost of Community Service Study Ratios for Residential, Commercial/Industrial, and Agricultural/Open-Space Land Uses



Ratio of expenditures over revenues for residential land uses

Frequency=number of studies finding this ratio