December 17, 2018

Ray Burger, Director of Planning
Town of Dryden
93 E. Main Street, Dryden, NY 13053

Re: Trinitas Ventures, LLC
Townhomes at Dryden
SEQR Completeness Review

Dear Ray,

I have reviewed the application materials digitally accessible from the Town’s website. Specific to Part 1 of the Full Environmental Assessment Form which is dated October 25, 2018, I recommend to the Town that additional information, in the form of studies and/or regulatory agency documentation, be provided in order to better understand potential environmental impacts and the adequacy of the Applicants mitigation measures.

C.2. Adopted Land Use Plans
a. Do any municipally-adopted comprehensive land use plans(s) include the site...?
Comment: Provide visual simulations of the development from the following vantage points:
   - Looking from the proposed drive entrance on NYS Rte. 366, south towards the site.
   - Looking from the proposed southernmost drive entrance on Mt. Pleasant, southwest towards the site.
   - Looking from the rail trail, north towards the proposed building cluster at the southeast corner of the site.
   - Looking from the rail trail, north towards the proposed building cluster at the northeast corner of the site.

C.3. Zoning
   c. Is a zoning change requested as part of the propose action?
      Comment: This should be marked “yes” and section “i” completed for the 15’ setback variance request.

D.2. Project Operations
a. Does the proposed action include any excavation, mining or dredging during construction operations...?
Comment: Confirm with supporting earthwork calculation that all excavated materials will remain onsite.
   - Identify the location of construction entrances and describe how use of Town roads by heavy truck traffic will be minimized.

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment of any existing wetland...?
Comment: Provide additional information for wetland mitigation including details, planting plan and site location. There are discrepancies of wetland area stated throughout Part 1. Correct areas to be consistent throughout.

c. Will the proposed action use, or create a new demand for water?

           David A. Herrick, P.E.       Dondi M. Harner, P.E.       Lee Dresser, L.S.
       Frank L. Santelli, P.E.       LEED A.P., C.P.E.S.C.       Darrin A. Brock, L.S.
       Andrew J. Sciarrabba, P.E.
Comment: Town Engineer to analyze the existing Varna water system to confirm if it can support the domestic and fire flow demands based upon a single, master-metered connection servicing the entire site.
- Adjust section “i” to show a range of flow based on 76gpd/bed to 110gpd/bed.
- Part ii- Service area should read “Varna Water District” not Bolton Point Water.
- Part iii- Water service extension within Rte. 366 R.O.W. will require a service agreement and dedication of infrastructure to the Town. Checkbox should be marked “yes”.
- Show location of existing utilities along NYS Rte. 366 per Town record maps previously provided.
- Site Utility Plan L3.0 shows a proposed waterline parallel to Mt. Pleasant. This connection should be removed leaving one connection from NYS Rte. 366 at the northern site entrance.

d. Will the proposed action generate liquid wastes?

Comment: The Town’s excess treatment capacity in the Ithaca Area Wastewater Treatment Facility was updated by the Special Joint Committee (SJC) on 11/1/18. The Town must confirm how to allocate the remaining capacity amongst all of the sewer districts. Hydraulic impacts to the existing collection pipe and pumping facilities in the Varna Sewer District are currently being studied by the Town Engineer.
- Adjust section “i” to show a range of flow based on 76gpd/bed to 110gpd/bed.
- Part iii- Sewer service extension within NYS Rte. 366 R.O.W. will require a service agreement and dedication of infrastructure to the Town. Checkbox should be marked “yes”.

Comment: The hydrologic analysis must include the full extents of the watershed area draining to the proposed permanent practices as well as the points of connection to the NYSDOT and Town drainage system.
- Provide additional information for intended use of the two lots on the north side of NYS Rte. 366 (952 and 966 Dryden Rd.). Clarify if the SWPPP will need to be expanded to incorporate site disturbance from these lots as part of the project scope.
- Provide correspondence from USACE regarding required mitigation measures for jurisdictional wetlands.
- Show proposed pond grading and outlet control structures for proposed permanent stormwater practices.
- Obtain correspondence from NYSDEC that anticipated pond/dam modifications will ultimately be reviewed and permitted.

j. Will the proposed action result in a substantial increase in traffic above present levels...?

Comment: Checkbox should be checked “yes”.
- Coordinate number of proposed parking spaces (424) within this section with the Zoning and Site Tabulation charts (428).
- Traffic Impact Study should be expanded to incorporate intersection analysis for Mt. Pleasant Road/ Turkey Hill Road, Turkey Hill Road/Stevenson Road and Stevenson Road /Game Farm Road.
- What will be the impacts to retail/coffee shop parking spaces access during the AM peak hour from vehicles queuing at the NYS Rte. 366 driveway.
- Town Engineer to discuss methodologies and computations with Applicant’s traffic consultant and submit additional comments to the Town, if warranted.

k. Will the propose action generate new or additional demand of energy?

Comment: Checkbox should be checked “yes”.
- Provide confirmation from NYSEG for electric and/or gas supply to the site.
- Provide completed Energy Questionnaire for the Town to forward to the County for completing the 239 Review.
l. Hours of operation.
Comment: Proposed hours of construction on weekends and holidays could be a significant noise impact to the surrounding neighborhood. Applicant should reconsider or suggest mitigation measures to avoid noise impacts.

E.1 Land uses on and surrounding the project site

h. Potential contamination history?
Comment: Checkbox should be marked “yes” and remaining sections should be completed based on information provided in Appendix C.
- If a Phase 1 Environmental Site Assessment has been completed, it should be provided to the Town.
- Has a hazardous material survey been completed for the existing structures to be demolished?

E.2 Natural Resources On or Near Project Site

h. Surface water features
Comment: Part “i” should be marked “yes” since there is a wetland on site. Part iv. List all streams located on the site to be consistent with those identified within the Wetland Delineation Report.

o. Does the project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened...
Comment: Add reference to the Northern Long Eared Bat.

E.3 Designated Public Resources On or Near Project Site

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...
Comment: Provide SHPO concurrence for two parcels on the north side of NYS Rte. 366.

f. Is the project site, or any portion of it, located in or adjacent to an area designated a sensitive for archaeological sites...
Comment: Select either “yes” or “no”.

Feel free to contact me with any questions related to this review. If requested, we can be available to meet with the Town and Applicant to review project specific requirements.

Respectfully,

Donald M. Harner, P.E., CPESC

Cc: J. Leifer, Supervisor