RECEIVED JAN 30 2019

CHA
design/construction solutions

Revised January 28, 2019
January 18, 2019

Ms. Katherine S. Wickwire
Chairperson
Town of Cortlandville Planning Board
Raymond G. Thorpe Municipal Building
3577 Terrace Road
Cortland, NY 13045

Re: ***Proposed Leonidas Group of Virgil, LLC Starr Road Residential PUD Site Plan Review***
SEQR Review Part 2 & 3
Tax Map No. 96.10-1-19.1
CHA Project No. 19646.5005

Dear Ms. Wickwire:

As you are aware, the Applicant for the above referenced project has submitted Part 1 of the Full Environmental Assessment Form (FEAF), which is dated 11/5/2018, as part of the SEQR process. The Starr Road Residential PUD project involves the development of 50 residential apartment and condominium units (ten (10) 2-unit duplex homes, three (3) 8-unit buildings, and one (1) 6-unit building) on 11.61 acres of land located on Starr Road.

CHA, on behalf of the Town, has reviewed Part 1 of the FEAF, as well as the Applicant's previously submitted project site plans and information, and a recent project narrative, dated 1/2/2019) in response to comments received at the November 27, 2018 Public Hearing.

Please note our comments as it relates to the completion of Part 1:

- B.a-The PUD was approved by the Town Board on 7/20/2016. The water and sewer will be private utilities and will not require sewer or water district extensions to be approved by the Town Board. List the date of approval of the Aquifer Permit.
- B.d-The water and sewer connections will require a Permit Applications from the Town Sewer and Water Department. The roadway connection to Parti Drive will require a Town Highway Work Permit.
- B.e.-The County Department of Health approval will be required for both the water and sanitary sewer facilities.
- B.g-A SPDES Permit for Wastewater Discharge from NYSDEC will not be required for this project.
- C.2.b- Answer Yes. Identified Plan is the NYS Major Basins: Upper Susquehanna
- D.1.e.ii-The Applicant has stated that the project will not be constructed in phases.
- We have provided the NYSDEC EAF Mapper Summary Report for the Full EAF for the Planning Board's information.

One Park Place, 300 South State Street, Suite 600, Syracuse, NY 13202-2024
T 315.471.3920 ● F 315.471.3569 ● www.chacompanies.com

Based upon our review of the documents and information, CHA is providing the following information for the Board's consideration as it relates to the completion of Part 2 of the FEAF.

1. Impact on Land

The proposed action may involve construction on, or physical alteration of, the land surface of the proposed site.
Answer: Yes.

Specifically, the proposed action may involve construction on slopes of 15% or greater, may involve construction that continues for more than one year or in multiple phases, and may result in increased erosion, whether from physical disturbance or vegetation removal.

The project will result in the disturbance of approximately 10 acres of land of the 11.6-acre site. Construction activities that have the potential to cause erosion and sedimentation include all soil movement, trenching, and excavations. Potential impacts associated with soil disturbance (erosion, sedimentation, compaction) can be mitigated by adherence to best management practices that are designed to avoid or control erosion and sedimentation, stabilize disturbed areas, and prevent the potential for spills of fuels or lubricants. All soil and sedimentation control shall be applied pursuant to The New York Standard and Specifications for Erosion and Sediment Control. The project must conform to the Town of Cortlandville Zoning Code, Article XVI: Stormwater Management and Erosion and Sediment Control.

Because the Project will disturb more than one acre of land, the Project will require a State Pollution Discharge Elimination System (SPDES) General Permit for Construction Activities (GP-0-10-001). Therefore, consistent with the requirements of the Environmental Conservation Law (ECL) a Stormwater Pollution Prevention Plan (SWPPP) will be submitted to NYSDEC prior to construction and will include definition of and locations of erosion and sediment control measures that will be constructed and implemented during construction.

Both CHA and CCSWCD have reviewed the updated stormwater models, report, and plans, and have determined that the stormwater management system adequately meets the Town Code's Stormwater Management and Erosion and Sediment Control and is consistent with the New York Standards and Specifications for Erosion and Sediment Control and the New York State Stormwater Management Design Manual.

As such, it is important that the construction of the stormwater management facilities are consistent with the plans and that regular inspection and maintenance of the facilities takes place once the project is complete. The Town will need to require that these actions are taken by the developer/land owner/homeowner's association.

Therefore, based upon the information available, it is reasonable to conclude that a small impact may occur.

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.
Answer: No.

CHA

3. Impact on Surface Water

The proposed action may affect one or more wetlands or other surface water bodies.
Answer: Yes.

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.

The project will disturb more than one acre and will create stormwater runoff during construction and after construction. An infiltration pond is proposed to capture the storm water runoff from the impervious areas of the site.

A hydrologic and hydraulic analysis was conducted utilizing the United States Department of Agriculture (USDA) Soil Conservation Service's (SCS) Technical Release No. 20, as implemented by the application program HydroCAD. HydroCAD was used to model the watershed's characteristics and stormwater management facilities during a 1, 10, and 100-year storm event. Both existing conditions and proposed conditions were modeled in order to ensure that runoff from the site is collected and managed through the use of rain gardens, bioretention areas, and an infiltration basin in order to control both the quantity and quality of the runoff.

Because the Project will disturb more than one acre of land, the Project will require a State Pollution Discharge Elimination System (SPDES) General Permit for Construction Activities (GP-0-10-001). Therefore, consistent with the requirements of the Environmental Conservation Law (ECL) a Stormwater Pollution Prevention Plan (SWPPP) will be required.

Both CHA and CCSWCD have reviewed the updated SWPPP, stormwater models, report, and plans, and have determined that the stormwater management system adequately meets the Town Code's Stormwater Management and Erosion and Sediment Control and is consistent with the New York Standards and Specifications for Erosion and Sediment Control and the New York State Stormwater Management Design Manual.

Therefore, based upon the information available, it is reasonable to conclude that a small impact may occur.

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.
Answer: Yes.

The proposed action will create additional demand on supplies from the existing Town water supply wells. The Applicant shall provide an Engineering Report to the Town outlining the proposed anticipated water demand for the project and the ability for the public water supply to serve the development.

The lower portion of the project site is located within the Town's Primary Aquifer Protection District. Therefore, any use of property within the Aquifer Protection District shall be permitted only upon obtaining a special permit from the Town Board of the Town of Cortlandville.

Contaminants from the project that may be introduced into the ground water are related to the impervious surfaces that accumulate pollutants leaked from vehicles and equipment, which during storm events, these pollutants quickly wash off, and are rapidly delivered to downstream waters. Other contaminants to the ground water include pesticides and salts that are applied to roads and parking lots in the winter months.

The SWPPP identifies potential non-stormwater discharges during construction, along with the implementation of best management practices, both during construction and post-construction to control these potential discharges. Various erosion and sediment control measures have been incorporated into the design of the project to minimize soil erosion and to protect the character and integrity of downstream receiving waters.

Both CHA and CCSWCD have reviewed the updated SWPPP and the Erosion and Sediment Control (ESC) plans and details, and have determined that proposed measures are consistent with the New York Standards and Specifications for Erosion and Sediment Control.

Therefore, based upon the information available, it is reasonable to conclude that a small impact may occur.

5. Impact on Flooding

The proposed action may result in the development on lands subject to flooding.
Answer: No.

The site is not located within any flood plains or designated floodway. The proposed stormwater management collection system will mitigate the increased runoff from the site. All stormwater runoff from the site will be captured and channeled to an engineered infiltration basin, which reduces the runoff volume to less than the existing conditions. The SWPPP and the New York State Stormwater Management Design Manual require all increases in stormwater runoff to be managed to the pre-development conditions. This project will not worsen the current existing localized drainage and flooding concerns along Starr Road, which can be attributed to upstream conditions. The project will control all stormwater runoff from the site and will not impact the drainage systems on Starr Road.

6. Impact on Air

The proposed action may include a state regulated air emission source.
Answer: No.

7. Impact on Plants and Animals

The proposed action may result in a loss of flora or fauna.
Answer: No.

According to the NYSDEC Resource Mapper, there are no plants or animals listed as endangered, threatened, rare, or species of special concern in the vicinity of the project.

8. Impact on Agricultural Resources

The proposed action may impact agricultural resources.
Answer: No

The subject property is not located in an Agricultural District.

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.
Answer: No.

The project has been granted a zone change to a Planned Unit Development (PUD) from a Residential R-2 Zone by the Town Board. The existing land uses surrounding the project include single family residential and multi-family residential apartments, which are all located within the Residential R-2 Zone.

There are no known officially designated scenic views, publicly accessible vantage points, or aesthetic resource in the vicinity of the proposed project.

10. Impact on Historic and Archaeological Resources

The proposed action may occur in or adjacent to a historical or archaeological resource.
Answer: No.

According to the NYSDEC Resource Mapper and the Cultural Resource Information System (CRIS), there are no archeological sensitive areas or historic listings.

Due to the project's need for the NYSDEC State Pollution Discharge Elimination System (SPDES) General Permit for Construction Activities (GP-0-10-001), the NY State Historic Preservation Office (SHPO) will need to be consulted to determine the project's impact prior to submitting a Notice of Intent (NOI) for coverage under the SPDES permit.

The Applicant has consulted SHPO (see attached letter dated 1/28/19, 19PR00492) and based upon their review, the project will have no impact on archaeological and/or historic resources listed in or eligible for the New York State and National Registers of Historic Places.

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.
Answer: No.

12. Impact on Critical Environmental Areas

The proposed action may be is located within or adjacent to a critical environmental area.
Answer: No.

NYSDEC does not list any Critical Environmental Areas within this immediate area.

13. Impact on Transportation

The proposed action may result in a change to existing transportation systems.
Answer: Yes.

The proposed action may alter the present pattern of movement of people or goods because a new road will be created for the project.

The Applicant has stated that an additional 31 vehicle trips will be added to the Starr Road roadway network. The source/edition of the trip generation data that the Applicant provided is not referenced, but the rates are not consistent with the current 10th edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual (TGM). The current ITE data for a proposed multi-family use produces a calculation of 32 trips during the peak hour (see attached). However, the actual difference for the proposed multi-family use is not significant when applied to this proposed project, such that the 31 trips noted in part 1 of the SEQRA FEAF is a reasonable estimate for the project.

The directional distribution of the PM peak hour trips should also be at 65% enter and 35% exit, and not at 67% enter and 33% exit as shown in the Trip Table provided by the Applicant. Since the total estimated volumes are low for this project, this difference of enter/exit distribution is not significant.

This volume of trip generation for the proposed project is substantially below the 100 vehicle per hour value that is often used as a threshold for determining significance. As per the SEQR EAF Workbook, a project generating fewer than 100 peak hour vehicle trips per hour will not result in any significant increases in traffic.

Also considering the low volumes on Starr Road (4,360 ADT in 2015 based on 2014 data – this is the most recent available estimate from NYSDOT), it can be concluded that the project will not have a significant impact on traffic operations along Starr Road or significantly change the character of traffic operations or flow patterns.

As such, the additional vehicle trips from this project is not a significant increase to the present traffic volumes and the existing roads have the capacity to handle that level of traffic without reconfiguration.

Therefore, based upon the information available, it is reasonable to conclude that a small impact may occur.

CHA

14. Impact on Energy

The proposed action may cause an increase in the use of any form of energy.
Answer: No.

The project will require electric and gas utilities, but the proposed increase in the use of any energy form is not to the level that would create any type of impact to the existing systems.

15. Impact on Noise, Odor, and Light

The proposed action may result in an increase in noise, odor, or outdoor lighting.
Answer: Yes.

The Applicant is proposing the addition of exterior building lights and light poles for the access driveway and parking areas. A Lighting Photometric Plan has been provided by the Applicant which shows no impact to the adjoining parcels.

As with any construction project, noise levels will increase over ambient levels. Noise levels and potential adverse effects due to construction activities would vary depending on the type of equipment, the location of the equipment, the duration of operations, and the time of operations. The most common noise source in construction areas would be from engine-powered machinery such as earth-moving equipment (excavators), material-handling equipment (cranes), and stationary equipment (generators). Mobile equipment (trucks) operates in a sporadic manner, while stationary equipment (generators and compressors) generate noise at a fairly constant level.

Typical noise levels from construction equipment range from 75 dBA to 85 dBA range measured 50 feet from the source. To the human ear, noise at 65 dBA is intrusive and 80 dBA is disruptive. At 80 dBA, people must shout to be heard. Hearing protection is recommended at noise levels above 90 dBA. Noise levels between 110 dBA and 120 dBA are typical of a rock concert. Construction noise beyond 50 feet would decrease by 6 dBA to 8 dBA for each doubling of the distance from the source. For example, if the noise level is 90 dBA at 50 feet from the source, it would decrease to about 83 dBA at 100 feet and 76 dBA at 200 feet.

To limit impacts related to construction noise and noise during operations, mitigation measures will limit days of operation, restrict hours of operation and specify hours of access and egress, and noisier operations will be limited to normal working hours. Construction equipment would typically operate during the hours of 7:00 am to 6:00 pm, Monday through Saturday. Construction equipment would not be operated on Sundays, State and Federal Holidays or from 6:00 pm to 7:00 am.

Therefore, based upon the information available, it is reasonable to conclude that a small impact may occur.

16. Impact on Human Health

The proposed action may have an impact on human health from exposure to new or existing sources of contamination.
Answer: No.

17. Consistency with Community Plans

The proposed action is not consistent with adopted land use plans.
Answer: No.

The project has been granted a zone change to a Planned Unit Development (PUD) by the Town Board.

Under Town of Cortlandville Town Code §178-53, a Residential PUD is permitted within any zoning district and the General Development Regulations under §178-54 were met, as follows:

- Minimum 10 contiguous acres.
- Requires a minimum 25 percent for open space and the proposed project has approximately 44 percent open space.
- Minimum requirement for providing at least two housing types by providing for single-family attached (duplex) units and multi-family attached units.
- Meets the base density for single family uses permitted in the original district. The original R-2 District permitted a density of 4.5 Dwelling Units (DU)/Acre. The proposes project density is at 4.3 DU/Acre and is less than the allowed in the R-2 District with the 50 dwelling units.

Therefore, the proposed action is consistent with local land use plans and zoning regulations.

In terms of land use components, this project is not in sharp contrast to current surrounding land use patterns, as there are several single-family homes to the north and east of the site and several apartment buildings to the west of the site.

The proposed action will create additional demand on existing infrastructure, but it does not appear to be significant and the existing infrastructure can support the proposed project. The Applicant shall provide an Engineering Report to the Town outlining the proposed anticipated sanitary sewage generated from the project and the ability for the public wastewater system to convey and treat the wastewater. The proposed action will also create additional demand from the existing Town water supply wells. The Applicant shall provide an Engineering Report to the Town outlining the proposed anticipated water demand for the project and the ability for the public water supply to serve the development.

18. Consistency with Community Character

The proposed project is inconsistent with the existing community character.
Answer: No.

The project has been granted a zone change to a Planned Unit Development (PUD) by the Town Board. The project is residential in nature and similar to the residential uses in the neighborhood or area, which is not in sharp contrast to what exists. The density of the project is also less than permitted in the R-2 Zone. Therefore, the project will not impact the community character along the Starr Road corridor.

CHA

In summary, it appears that small impacts may occur as a result of the proposed project. Since the impacts have not been identified as potentially moderate to large, there is not a need to further explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.

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

Very truly yours,

Laura C. Cassalia

Laura C. Cassalia, P.E.
Project Manager

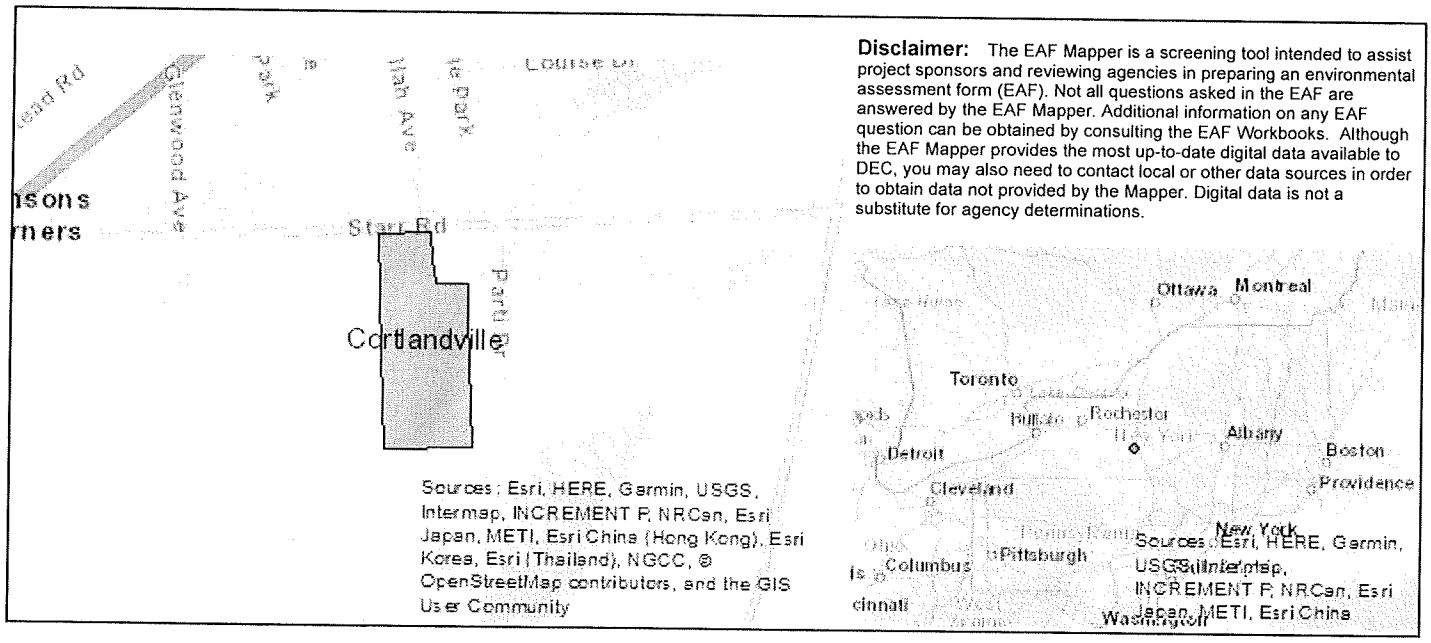
LCC
cc: Planning Board Members
Bruce Weber, Town Planning/Zoning Officer
John Folmer, Town Attorney

\\cha-llp.com\proj\Projects\ANY\K4\19646\Phases\Phase 5005-Starr Rd PUD\20181108_SEQR\CHA SEQR review comments\CHA SEQR comment part 2 and 3_20190128_RevisedFinal2.doc

CHA

EAF Mapper Summary Report

Thursday, December 20, 2018 1:54 PM



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]	Yes - Digital mapping data are not available for all Special Planning Districts. Refer to EAF Workbook.
C.2.b. [Special Planning District - Name]	NYS Major Basins:Upper Susquehanna
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]	No
E.2.h.iii [Surface Water Features]	No
E.2.h.v [Impaired Water Bodies]	No
E.2.i. [Floodway]	No
E.2.j. [100 Year Floodplain]	No
E.2.k. [500 Year Floodplain]	No
E.2.l. [Aquifers]	Yes
E.2.l. [Aquifer Names]	Principal Aquifer, Sole Source Aquifer Names:Cortland-Homer Preble SSA, Primary Aquifer
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

NEW YORK
STATE OF
OPPORTUNITY.

Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

January 28, 2019

Mr. Timothy Buhl
35 Fire Lane 24
Auburn, NY 13021

Re: DEC
Starr Lite Ridge Residential Community
Starr Road, Cortlandville, NY
19PR00492

Dear Mr. Buhl:

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the project in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the OPRHP and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

Based upon this review, it is the New York State Office of Parks, Recreation and Historic Preservation's opinion that your project will have no impact on archaeological and/or historic resources listed in or eligible for the New York State and National Registers of Historic Places.

If further correspondence is required regarding this project, please be sure to refer to the OPRHP Project Review (PR) number noted above.

Sincerely,

Michael F. Lynch, P.E., AIA
Director, Division for Historic Preservation

Graph Look Up

Query

DATA SOURCE:
Trip Generation Manual, 10th Ed

SEARCH BY LAND USE CODE:
220

LAND USE CATEGORY:
(200-299) Residential

LAND USE :
220 - Multifamily Housing (Low-Rise)

INDEPENDENT VARIABLE (IV):
Dwelling Units

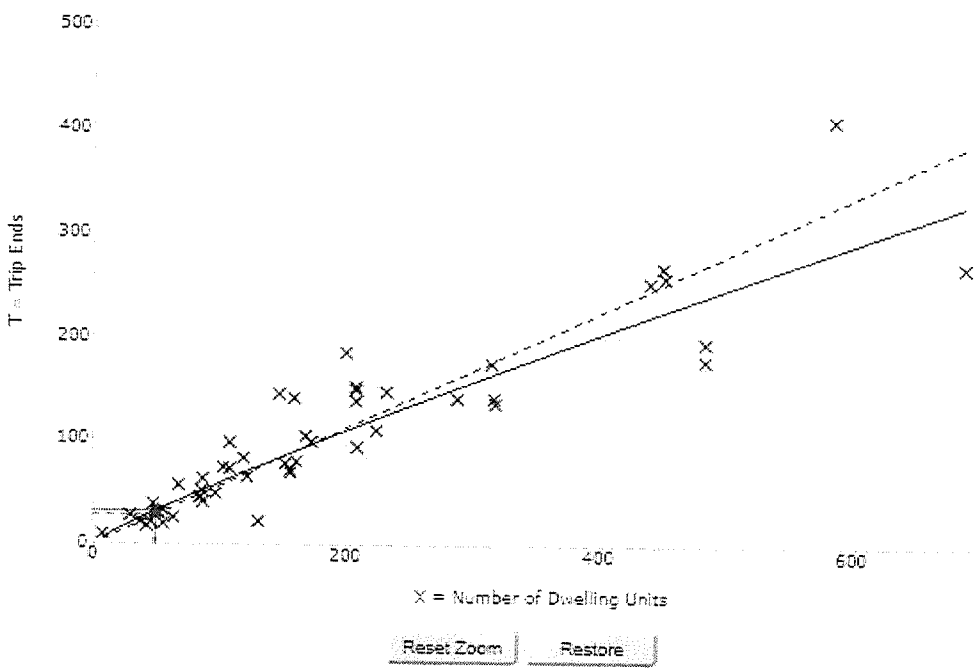
TIME PERIOD:
Weekday, Peak Hour of Adjacent Street Traffi

SETTING/LOCATION:
General Urban/Suburban

TRIP TYPE:
Vehicle

ENTER IV VALUE TO CALCULATE TRIPS:
60 Calculate

Data Plot and Equation



Use the mouse wheel to Zoom Out or Zoom In.
Hover the mouse pointer on data points to view X and T values.

DATA STATISTICS

Land Use:
Multifamily Housing (Low-Rise) (220) Click for more details

Independent Variable:
Dwelling Units

Time Period:
Weekday
Peak Hour of Adjacent Street Traffic
One Hour Between 4 and 6 p.m.

Setting/Location:
General Urban/Suburban

Trip Type:
Vehicle

Number of Studies:
50

Avg. Num. of Dwelling Units:
167

Average Rate:
0.66

Range of Rates:
0.18 - 1.25

Standard Deviation:
0.16

Fitted Curve Equation:
Ln(T) = 0.89 Ln(X) + 0.02

R^2:
0.86

Directional Distribution:
63% entering, 37% exiting

Calculated Trip Ends:
Average Rate: 23 (Total), 16 (Entry), 10 (Exit)
Fitted Curve: 30 (Total), 20 (Entry), 10 (Exit)