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Environmental Planning & Site Analysis  
Wetland Mitigation & Restoration Plans  
Wetland Delineation & Assessment  
Natural Resource Management  
Pond & Lake Management  
Wildlife & Plant Surveys  
Breeding Bird Surveys  
Landscape Design

## MEMORANDUM

To: Town Supervisor  
Town of Southeast Town Board  
From: Stephen W. Coleman  
Date: February 03, 2013  
**Re: Crossroads/312 pDEIS – Completeness Review Comments**  
Cc: Tom LaPerch, Victoria Desidero, Ashley Ley, Tom Fenton, Will Stephens

I have completed a review of the revised pDEIS prepared for the Crossroads Commercial Development. I specifically reviewed Chapter 7 and 9 of the pDEIS, to determine if the responses adequately address the items outlined within the adopted scope for the project. It is my determination, that the responses to these sections are lacking sufficient detail to adequately review the content for completeness. My specific comments are as follows:

### Chapter 7: Natural Resources:

1. The natural resource inventory appears to rely upon data collected between the years 2008-2010. The report does not indicate if any updates or field analysis was completed more recently to document any changes or additional species that may have been observed to be present. The report also does not identify the survey methods used to conduct the field inventory. The field data should be based upon current information documented during 2012.
2. The Existing Conditions have been adequately addressed and quantified on the site regarding the type of habitat communities that are present. The extent of habitat types present have been documented and mapped.
3. The Wildlife Assessment was completed during 2008 to 2010 and does not indicate the amount of time that was actually spent on the site and does not indicate the methodologies and required protocols that were used to complete natural resource inventories. The report should indicate whether any field surveys were completed in 2012 and also provide detailed descriptions of the specific methodology used to capture field data. This information is necessary to determine whether appropriate protocols were used to census different focal target wildlife species.
4. The field survey dates provided indicate that no inventories were completed at the appropriate time of year to document breeding bird species (protocols require field site visits during the months of May to June at set intervals).

Information is also lacking on the census techniques used to document mammal species or sampling methods used to document reptile and amphibian species.

5. The data documents very few species that were actually observed and lists species that potentially occur on the site based upon published data. In order to assess potential impacts upon wildlife species that utilize the subject property and adjacent habitats, it is important to ascertain whether actual field data corroborates and confirms published data records. Specific locations of where species were observed on the subject property would assist in determining how to mitigate impacts to flora and fauna.
6. The data provided indicated that spring peepers were observed on the site and apparently breeding within wetland C. This species is considered a potential vernal pool species and its use of the property may indicate potential habitat features are present near the site. A more detailed analysis of the adjacent state wetland may be necessary to determine the extent of this species use of the property and what the potential impacts may be to this species from development of the site and the importance of the upland habitat adjacent to the wetlands on and immediately adjacent to the site. More information is necessary to determine project impacts and mitigation measures.
7. The report indicates that 35 of the 52 acres of the site will be disturbed. The report does not address the impacts to existing vegetative communities or the impacts on species. Information on the methods of tree removal and corresponding loss of habitat are not provided. No specific information is provided on tree protection measures. The impact on wildlife species as a result of the loss of tree cover should be evaluated and a discussion of how this impact will be mitigated should also be provided.

#### Chapter 9: Water Resources and Wetlands:

The wetlands located on the subject property have been well documented. The wetlands have been confirmed and surveyed and depicted accurately on the proposed site plans. A wetlands functional assessment has been provided for each specific wetland area. No direct wetland impacts are proposed, however, impacts are proposed within the Town's regulated buffer areas.

1. The proposed plans should first explain why impacts within regulated wetland buffer areas cannot be avoided. An alternative plan should be prepared that avoids impacts within regulated wetland buffer areas.
2. The narrative should provide a detailed analysis of all potential direct and indirect impacts on wetlands and associated wetland buffer areas including a discussion of effects on quality and quantity of water resources resulting from increased

impervious surfaces and stormwater runoff. The extensive clearing of 68% (35 acres of the 52 acres) of the upland forested cover should be quantified. This should include the number of trees to be removed and the potential impact from the loss of tree cover. The stabilization of existing slopes as a result of tree removal, increased runoff from loss of evaporation from tree cover, and corresponding loss of vegetative cover should be quantified and the impact on the function of remaining wetland buffer evaluated.

3. The impacts on wetland hydrology should be evaluated as a result of extensive clearing of the majority of the site and associated ground disturbance. This analysis should evaluate potential impacts on surface and subsurface hydrology, as a result of changes to infiltration rates and potential hydrogeological impacts on groundwater flows. Data should be provided on the potential impacts to wetland functions and whether these site changes would impact surface and subsurface recharge to adjacent wetlands.
4. The impact of proposed stone retaining walls and the use of the site by wetland dependent wildlife species should be evaluated. Analysis should include the impact on movement patterns, loss of wildlife corridors and restriction of available habitat for environmentally sensitive species should be examined.
5. Several of the wetlands are important for stormwater and flood storage. The impact from the proposed site disturbance and the stormwater management plan should be evaluated. Specifically, the loss of infiltration, changes to surface flows, and/or the ability of the stormwater management plan to provide infiltration should be clarified.
6. The mitigation of impacts to regulated wetlands and buffers should be expanded to demonstrate how unavoidable impacts will be mitigated and losses to wetland buffer functions replaced.
7. A five year wetland and wetland buffer mitigation and monitoring plan should be provided.

Please let me know if you have further questions or require additional information.