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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: November 11, 2013
Re: Crossroads 312 – DEIS Review Comments
Cc: Michele Stancati, Tom LaPerch, Victoria Desidero, Ashley Ley, Tom Fenton

I have completed a review of the Draft Environmental Impact Statement (DEIS) for the Crossroads 312 Commercial Development. I specifically reviewed Chapter 7 and 9 of the DEIS, and offer the following comments:

In general, the revised DEIS (Chapters 7 and 9) have provided initial baseline information, however, the DEIS lacks sufficient data to be able to evaluate the project's impacts to habitats (loss of 60% of tree canopy) and impacts to wetland resources.

Chapter 7: Natural Resources:

- The text and the tables for lists of plants are not consistent and some of the plant species discussed is not reflected in the table. This should be corrected.

- The natural resources chapter appears to consist of an edited version of the Natural Resource Inventory completed by Evans Associates. A full version of the Natural Resource Inventory Report should be included in the Appendix and a statement provided that indicates that the narrative is consistent with the full version.

- The breeding bird survey identified several forest interior bird species to be present on the subject parcel. Several of these species are listed as NYS special concern status species. Species such as the hooded warbler, ovenbird, veery, are ground and lower canopy nesting species. The impact of clearing of the site on these species and recommended mitigation measures should be provided.

- 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.

- The potential impact on amphibian and reptile species that utilize the property from clearing of the forested upland habitat has not been addressed. The report should also document whether spring peepers were observed utilizing upland areas of the site.

- The criteria used to classify the wetland as a non-vernal pool habitat should be expanded within the DEIS.

- The report indicates that 31 of the 52 acres of the site will be disturbed. The DEIS 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.

- The extensive clearing of 60% (31 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.

- The DEIS does not provide sufficient details on how the impact of clearing will be mitigated. More specific details should be provided on the type of mitigation measures that will be used and more importantly, where these measures will be located on the subject property.

- A tree preservation and tree replacement plan should be prepared that addresses the impacts to existing habitats.

Chapter 9: Water Resources and Wetlands:

- The projects hydrological impacts have not been adequately addressed and it is likely that encroachment within wetland buffer areas will be required. The statement that no impacts will occur within regulated wetland areas may need to be revised pending submittal of hydrological analysis, data and plans for infiltration and water quality treatment to sustain hydrology to wetlands.

- The proposed plans should clarify whether impacts within regulated wetland buffer areas can be avoided, and if not, then the amount of buffer disturbance should be quantified and mitigation measures provided to offset planned impacts.

- The DEIS does not 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 data and specific analysis is missing from the document as to how stormwater runoff will be infiltrated and treated to provide necessary hydrological support for the wetlands. (Based upon the site's topography and soils, it is very likely that the only areas on the site that are capable of providing infiltration and treatment are located within the regulated wetland buffer areas). This issue needs to be adequately addressed in order to evaluate the hydrological impact and the corresponding methods to be used to mitigate impact to wetland resources.

- 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 hyrdogeological 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.

- The proposed stormwater plans lack data (soil logs, infiltration rates, etc.) that describes how and where stormwater runoff will be infiltrated and treated prior to discharge into the wetlands. (The wetland resources receive hydrological support primarily from ground water and some surface discharge. This requires that water be capable of infiltrating into the ground to provide important recharge for the existing wetlands). No plans have been provided on how this would be accomplished.

- The impact of proposed stone retaining walls on movement patters of wetland dependent wildlife species has not been evaluated. Analysis should include the impact on movement patterns, loss of wildlife corridors and restriction of available habitat for environmentally sensitive species.

- 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.

- A five year wetland and wetland buffer mitigation and monitoring plan should be provided.

This completes my comments at this time. Please let me know if you have questions or require additional information.