

**Findings –Chainworks District Redevelopment Project  
City of Ithaca  
Tompkins County, New York**

*— Moved by Blalock, seconded by Glass, and approved by Blalock, Glass, Johnston, Jones, Lewis, and  
Petrina at the March 26, 2019 meeting of City of Ithaca Planning and Development Board —  
(Elliott absent, no vacancies)*

**WHEREAS:** the City of Ithaca Planning and Development Board has one pending application for Site Plan Approval for the Chain Works District Redevelopment Project (CWD) to be located at 620 S. Aurora Street by Jamie Gensel of Fagan Engineers & Land Surveyors PC, for David Lubin, Project Sponsor, Unchained Properties (UP), and

**WHEREAS:** the proposed CWD seeks to redevelop and rehabilitate the +/-800,000-SF former Morse Chain/Emerson Power Transmission facility, located on a 95-acre parcel traversing the City and Town of Ithaca’s municipal boundary. The applicant has applied to Common Council for a Planned Unit Development (PUD) for a mixed-use district, which includes residential, commercial, office, manufacturing and a natural area, and which consists of four primary phases: (1) the redevelopment of four existing buildings (21, 24, 33, & 34); (2) the repurposing of the remaining existing buildings; (3) potential future development within areas of the remainder of the site adjacent to the existing buildings/parking areas; and (4) future developments within remaining areas of the site. The project also requires a subdivision approval and approvals from the Town of Ithaca for a Planned Development Zone and site plan approval, and

**WHEREAS:** The proposed project exceeds the thresholds defined for Type I projects in both the State and City Environmental Quality Review Law. Type I actions carry with them the presumption that it is likely to have a significant effect on the environment. Specifically, this project exceeds the Type I thresholds as defined in Chapter 176 of the City of Ithaca Code, Environmental Quality Review Ordinance, §174- 6 (B)(1)(i),(j),(k),(n), (2), (6), (7),(8)(a)and (b) and the State Environmental Quality Review Act §617.4 (b)(2),(3), (5)(iii), (6)(i), and (iv), and

**WHEREAS:** the City of Ithaca Planning and Development Board, as Lead Agency, made a Positive Declaration of Environmental Significance on October 2, 2014, directing the Project Sponsor to prepare a Draft Generic Environmental Impact Statement (DGEIS) to evaluate potential impacts of the proposed project, and

**WHEREAS:** on October 18, 2014, the City of Ithaca Planning and Development Board held both an Agency Scoping Session and a Public Scoping Session to identify issues to be analyzed in the GEIS, and

**WHEREAS:** the City of Ithaca Planning and Development Board did, on January 13, 2015, approve a Scoping Document, and

**WHEREAS:** the City of Ithaca Planning and Development Board, as Lead Agency for the purpose of environmental review, did on March 8, 2016 review the DGEIS submitted by the Project Sponsor for completeness and adequacy for the purpose of public review and comment, and with the assistance of City Staff and the City’s consultants, Adam Walters of Phillips Lytle LLP, find the DGEIS to be satisfactory with respect to its scope, content, and adequacy, and

**WHEREAS:** on March 29, 2016, a public hearing was held by the Planning and Development Board to obtain comments from the public on potential environmental impacts of the proposed action as evaluated in the DGEIS, and written comments for the same purpose were accepted until May 25, 2016, and

**WHEREAS:** the Planning and Development Board as Lead Agency, did on March 26, 2019 accept the Final GEIS for the CWD as complete for filing, having duly considered the potential adverse environmental impacts and proposed mitigating measures as required under 6 NYCRR Part 617 (the SEQRA regulations) and Chapter 176 of the City of Ithaca Code (the City of Ithaca Environmental Quality Review Ordinance, CEQRO), *now, therefore, be it*

**RESOLVED:** that consistent with social, economic and other essential considerations, from among the reasonable alternatives available, the action to be carried out minimizes or avoids, to the maximum extent practicable, adverse environmental impacts disclosed in the Draft and Final Generic Environmental Impact Statements, *and be it further*

**RESOLVED:** that the Planning Board makes the following Findings supporting this determination:

This document is a Findings Statement prepared by the City of Ithaca Planning and Development Board, as Lead Agency relating to the Chainworks Redevelopment Project, pursuant to the New York State Environmental Quality Review Act, Article 8 of the Environmental Conservation Law and the regulations promulgated thereto at 6 NYCRR Part 617 (collectively referred to as “SEQRA”) and Chapter 176 of the City of Ithaca Code, City Environmental Quality Review Ordinance (“CEQRO”). This Findings Statement draws upon the matters set forth in the SEQRA/CEQRO record, including the Generic Environmental Impact Statement (“GEIS”), consisting of the DGEIS and the FGEIS, as well as the public comments on the DGEIS received at a public hearing and during the public comment period.

As stated above, a DGEIS and FGEIS have been prepared on behalf of the Lead Agency. The purpose of the DGEIS and FGEIS was to identify and evaluate the potential significant adverse environmental impacts of the proposed project and, where applicable, to identify reasonable alternatives or mitigation measures that would reduce the effect of those impacts to the maximum extent practicable.

This document represents the conclusion of the environmental review of the proposed project by the Lead Agency. Under SEQRA and CEQRO, this Findings Statement must:

1. Consider the relevant environmental impacts, facts and conclusions disclosed in the GEIS;
2. Weigh and balance relevant environmental impacts with social, economic and other considerations;
3. Provide a rationale for the Planning Board’s pending decision (regarding site plan review for the Project);
4. Certify that the requirements of SEQRA have been met;
5. Certify whether, consistent with social, economic and other essential considerations, from among the reasonable alternatives available, the action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and whether any such adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to any site plan approval those mitigation measures that were identified, in the GEIS, as practicable.

This is a “positive” findings statement, which means that the proposed Project is potentially “approvable” (a relevant term used in the State’s “SEQR Handbook”) by the Planning Board, as to its site plan. The Planning Board will use this Findings Statement to assist in its review of the proposed site plan, and in considering conditions that could be applied to any approval thereof.

All involved agencies, as listed in the FGEIS, should prepare their own SEQRA findings before making their own decisions.

**STATE ENVIRONMENTAL QUALITY REVIEW  
CHAIN WORKS DISTRICT REDEVELOPMENT PROJECT  
FINDINGS STATEMENT**

Pursuant to Article 8 of the Environmental Conservation Law (State Environmental Quality Review Act) and the City of Ithaca's Environmental Quality Review Ordinance (collectively, SEQR), and applicable implementing regulations, the City of Ithaca Planning and Development Board, as Lead Agency under SEQR, makes the following findings.

**Name of Action:** Chain Works District Redevelopment Project

**Date:** March 26, 2019

**Lead Agency:** City of Ithaca Planning and Development Board  
108 East Green Street  
Ithaca, New York 14850

**Project Sponsor:** UnChained Properties, LLC (UP)

**Project Location:** The Project is located on approximately 95 contiguous acres of land in central NYS, South of Cayuga Lake in the Finger Lakes Region, and straddles the City and Town border in Tompkins County (Site or Project Area). The Site is bounded as follows:

To the east, the Site follows South Aurora Street / NYS Route 96B, a major transportation corridor that connects downtown Ithaca to South Hill, Ithaca College, and the residential neighborhoods in the Town. It is a primary route for travelers from Binghamton and points south.

To the north, the Site borders residential neighborhoods comprised primarily of single and multifamily homes in the City.

To the west, the Site slopes steeply to meet Spencer Street in the City, then traces the back of the residential properties lining the east side of Spencer Road. In the Town of Ithaca, the property line traces the alignment of the former Lehigh Valley Railroad and future Gateway Trail, as well as a large parcel of undeveloped land.

To the south, the Site borders the South Hill Business Campus in the Town.

**Classification:** Type I Action; Positive Declaration Issued; DGEIS and FGEIS Prepared

**Contacts:** Lead Agency:  
Lisa Nicholas  
City of Ithaca Planning Department  
108 East Green Street  
Ithaca, New York 14850  
Phone: (607) 274-6550

Project Sponsor:  
David Lubin  
UnChained Properties, LLC  
225 Colonial Drive  
Horseheads, NY 14845  
Phone: (607) 739-3826

## DESCRIPTION OF ACTION:

The Chainworks District (CWD) Project (Project or Preferred Alternative) is a proposed mixed-use redevelopment of the 95-acre former Morse Chain/Emerson Power Transmission facility (Site) that traverses the City and Town of Ithaca's municipal boundary. The Site is located along the New York State Route 96B corridor and where Turner Street and South Cayuga Street meets the northern edge of South Hill. The Project involves the redevelopment and rehabilitation of the existing architecture and landscape into a 1.7 million square foot (sf) mixed-use "live, work, play" district. Attached hereto as **Attachment A** is FGEIS Figure 2.3-2 Conceptual Site Layout Plan. The Project consists of removing approximately 92,320 sf of the existing 821,200 sf buildings, constructing 86,600 sf of vertical additions, and constructing 890,700 sf of new buildings. The Project is estimated to be completed over a seven-to-ten year period. The first phase (Phase I) will consist of redeveloping four existing buildings generally located at the northern and southern most ends of the Site. These first four buildings are approximately 331,450 sf and will contain a mix of office, residential, and industrial uses. Subsequent phases of development will be determined as the Project proceeds and will include new structures to complete a full buildout of 1,706,150 sf consisting of approximately 915 residential dwelling units, 184,350 sf of commercial space and 260,900 sf of industrial use.

Infrastructure work related to the full development of the Project will include the following: (1) removing select buildings to create public courtyard areas and a network of open spaces and roads; (2) creating pedestrian, bicycle, and vehicular connections throughout the Site from South Hill to Downtown Ithaca; (3) improving the existing roads within the Site while creating new access points into the Site; (4) mitigating existing environmental impacts from historic uses; (5) fostering the development of a link, the Gateway Trail, to the Black Diamond Trail network; and (6) installing stormwater management facilities, lighting, public water and utilities, landscaping and other Site amenities.

The development of the Site is fostered by a proposed rezoning of the City portion of the Site into a Planned Unit Development (PUD), and the Town portion into a Planned Development Zone (PDZ). Design Guidelines are set forth in the proposed PUD/PDZ Zoning Code. The PUD/PDZ Zoning Code is attached hereto as **Attachment B**. The zoning and related Design Guidelines for the Project divide the development of the Site into four (4) Sub Areas, each with its own set of Design Guidelines to focus the Project Sponsor's vision for the Project as an integrated whole. Sub Areas CW2 and CW3 were further enumerated into subsections, as shown in FGEIS Figure 2.3-1 below.

The addition of subsections and building buffers are in response to comments received during the Generic Environmental Impact Statement (GEIS) process, specifically regarding the character/size of the existing residential structures adjacent to the Project and the additional need of a transition between the existing and proposed structures along NYS Route 96B. The Sub Areas are defined as:

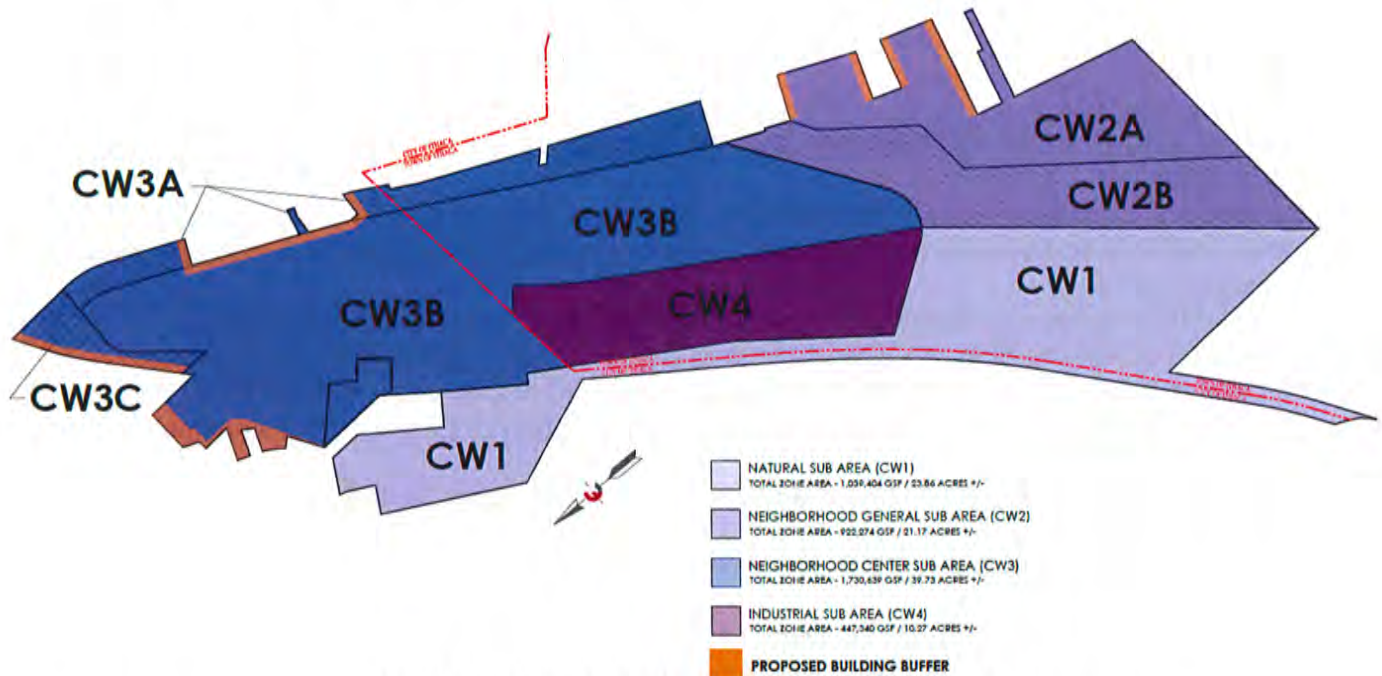
Natural Sub Area (CW1): A ± 23.9 acre conservation zone containing a mature Appalachian Oak-Hickory forest to be used for passive recreation, generally located along the western portion of the Site.

Neighborhood General Sub Area (CW2): A ± 21.2 acre zone for clusters of new residential development using a mix of housing styles and coinciding with primary points of access into the Site, generally located at the southeastern end of the Site within the Town. The CW2 Sub Area is split into subsections CW2A and CW2B. This allowed for the reduction from 6 to 4 stories in the CW2A in response to GEIS comments.

Neighborhood Center Sub Area (CW3): A ± 39.7 acre zone for mixed uses ranging from residential to industrial, using existing buildings at the core of the Site and clusters of new buildings at the northern edge of the Site and along NYS Route 96B; all located in the City and Town. The CW3 Sub Area is split into subsections CW3A, CW3B and CW3C in response to GEIS Comments. CW3A reduce the maximum allowed above-grade stories from 6 to 4 and maximum allowed façade length from 180 feet

to 120 feet. CW3C also reduces the maximum allowed above-grade stories from 6 to 4 but also prohibits below-grade stories.

Industrial Sub Area (CW4): A ± 10.3 acre zone for industrial uses centrally located on the Site using existing buildings located in the City and Town.



FGEIS Figure 2.3-1 PUD/PDZ Sub Area Boundary Map (R+W)

Following a detailed design process with extensive public outreach and involvement, the Project Sponsor unveiled a detailed conceptual site plan in October 2014. On October 20, 2015, the Planning Board issued a positive declaration for the Project, requiring the preparation of a GEIS. The Lead Agency issued notices to all then-known involved or interested agencies to solicit Lead Agency status for the Project on October 28, 2014. The Project Sponsor then prepared a Draft GEIS (DGEIS), copies of which were made available for public review. The DGEIS was accepted as complete by the Lead Agency on March 8, 2016, and a Notice of Public Hearing appeared in the Ithaca Journal on March 18, 2016 and in the Environmental Notice Bulletin on March 23, 2016. A public hearing on the proposed Project was held on March 29, 2016. Due to extensive public interest, the public comment period was extended from May 10, 2016 to May 25, 2016.

Many comments were received during the public comment period. Copies of all comments received are provided in Appendices A and B of the Final GEIS (FGEIS), which also incorporates the DGEIS by reference. Responses to every substantive comment received is provided in Chapter 3 of the FGEIS. Comments covered the purpose and need for the Project, the alternatives considered, potential environmental impacts, and mitigation measures, among other things. In light of the comments received, various changes were made to the DGEIS. These changes are detailed in Chapter 4 and Appendix D of the FGEIS.

Final designs for less-defined, more conceptual Project phases and components, or any proposed changes to the better-defined elements (collectively, Future Project Plans) will require further evaluation pursuant to SEQ. The lead agency will be responsible for performing an environmental review on the Future Project Plans proposed in relation to (i) the FGEIS and (ii) the Findings Statement. Once Future Project Plans have been submitted to the lead agency, that agency must determine if the environmental impacts associated with such Future Project Plans have been adequately addressed in the FGEIS and SEQ. Findings Statement.

Additionally, the following reviews, permits and/or approvals are/were required to facilitate the proposed Project:

- SEQR: Preliminary Site Plan Approval of Conceptual Site Layout Plan and Final Site Plan Approval for two Buildings (from the City of Ithaca Planning and Development Board)
- Rezoning to a PUD (from the City of Ithaca Common Council)
- Building and Demolition Permits; Certificate of Occupancy (from the City of Ithaca Code Enforcement)
- Highway Work Permits; Water and Wastewater System Improvements Plan Approval (from the City of Ithaca Board of Public Works)
- Rezoning to a PDZ (from the Town of Ithaca Town Board) Preliminary Site Plan Approval of the Conceptual Site Layout Plan and Final Site Plan Approval for two Buildings (from the Town of Ithaca Planning Board)
- Building and Demolition Permits; Certificate of Occupancy (from the Town of Ithaca Code Enforcement)
- Water and Wastewater System Improvements Plan Approval (from the Tompkins County Department of Health (TCDOH))
- County Planning Review (from the Tompkins County Department of Planning (TCDP))
- Highway Work Permit (from the New York State Department of Transportation (NYSDOT))
- 401 Water Quality Certification; State Pollutant Discharge Elimination System (SPDES) / Stormwater Pollution Prevention Plan (SWPPP); (from the New York State Department of Environmental Conservation (NYSDEC))
- Water and Wastewater System Improvements Plan Approval (from the New York State Department of Health (NYSDOH))
- Federal and State Preservation (from the New York State Office of Parks, Recreation, and Historic Places (NYSOPRHP))
- Amendment to the current Record of Decision (ROD) to allow mixed-use development (NYSDEC)
- Request for Boundary Modification to release southern portion of Site from Inactive Hazardous Waste Disposal Site (IHWDS) Registry (NYSDEC)

## **FACTS AND INFORMATION RELIED UPON TO SUPPORT THE DECISION:**

1. The City of Ithaca Planning and Development Board, as Lead Agency, conducted a coordinated review pursuant to SEQR.
2. The City of Ithaca Planning and Development Board commenced the SEQR process for the Project in October of 2014 by circulating a notice of intent to act as Lead Agency along with a Full Environmental Assessment Form to all then-known Interested or Involved Agencies:

### Involved Agencies

- City of Ithaca (City)
- City of Ithaca Board of Public Works
- City of Ithaca Common Council
- City of Ithaca Planning and Development Board (Lead Agency)
- NYSDEC, Region 7
- NYSDOH
- New York State Department of Office of Parks, Recreation, and Historic Preservation (SHPO)
- NYSDOT, Region 3
- TCDOH
- TCDP
- Town of Ithaca (Town)
- Town of Ithaca Town Board
- Town of Ithaca Planning Board

### Interested Agencies & Parties (Note: Some City groups no longer in existence as of 2018)

- South Hill Civic Association (SHCA)
  - Tompkins County Area Development
  - City of Ithaca School District
  - Community Advisory Group (CAG)
  - City of Ithaca Conservation Advisory Council (CAC)
  - City of Ithaca Bicycle/Pedestrian Advisory Council (BPAC)
  - City of Ithaca Shade Tree Advisory Committee (STAC)
  - Disability Advisory Council (DAC)
3. None of the Interested or Involved agencies objected to the City of Ithaca Planning and Development Board acting as Lead Agency pursuant to SEQR and the City of Ithaca Planning and Development Board was properly established as the SEQR Lead Agency for the Project in November of 2014.
  4. Following a detailed design charrette planning process with extensive public outreach and involvement, the Project Sponsor unveiled a detailed concept site layout plan for Chain Works in October 2014.
  5. On October 2, 2014, the Lead Agency issued a positive declaration for the Project requiring the preparation of the DGEIS.
  6. Following issuance of the positive declaration, a Draft Scoping Report was issued. A Public Scoping Meeting to solicit comments on the draft scope was held on October 18, 2014 and a Final Scoping Document was approved on January 13, 2015.

7. Following issuance of the Final Scoping Document, the DGEIS was prepared by UP pursuant to the requirements of SEQR. On March 8, 2016, the Lead Agency determined that the DGEIS was complete and adequate for public review and scheduled a public hearing.
8. Copies of the DGEIS were made available for public review at the City of Ithaca Planning Department, the Town of Ithaca Planning Department, the City of Ithaca Office of the Clerk and the Tompkins County Public Library. A copy of the DGEIS was also posted on the CWD website.
9. A Notice of Completion of the DGEIS and Notice of Public Hearing appeared in The Ithaca Journal on March 18, 2016 and the Environmental Notice Bulletin (ENB) on March 23, 2016.
10. A public hearing was held on March 29, 2016 at the Cinemapolis movie theater. Due to extensive public interest in the Project and several requests made during the DGEIS public hearing, the public comment period, originally scheduled to expire on May 10, 2016, was extended until May 25, 2016.
11. Notices of comment period extension were published in the Ithaca Journal, City of Ithaca Planning and Development Board website and on the CWD website. Additionally, comments received after the end of the public comment period prior to the issuance of the FGEIS have been accepted and responded to within this FGEIS.
12. The FGEIS was issued on February 26, 2019 and a notice of completion of the FGEIS appeared in the ENB on 3-13-19.
13. The FGEIS was distributed to the Interested and Involved agencies and copies of the FGEIS were made available for public review at The Planning Department at the City of Ithaca and the Tompkins County Public Library – Central Branch. A copy of the FGEIS has also been posted on the CWD website. Pursuant to SEQR, the FGEIS was held open and available for more than 10 calendar days in order to afford agencies and the public a reasonable time period in which to consider the FGEIS before the Lead Agency issued its written findings statement.
14. The Lead Agency has carefully and thoroughly reviewed the information contained in the DGEIS, including all appendices and the comments to the DGEIS, and the FGEIS including all appendices (collectively referred to as the GEIS). The Lead Agency finds that the GEIS provides a thorough examination of all significant potential impacts that would result from undertaking the Project. The Lead Agency has carefully reviewed, questioned and analyzed the various impacts of, alternatives to, and potential mitigative measures for the Preferred Alternative and weighed these issues against the social and economic benefits of the Preferred Alternative and other essential considerations.
15. The Lead Agency recognizes that qualified experts on any topic may differ in their conclusions and, in particular, may differ in the judgments employed during analysis. Nevertheless, the Lead Agency has carefully reviewed many hundreds of pages of documentation on the various issues that have been submitted by government agencies, experts, interested stakeholders and the general public that reflect hundreds of hours of examination of the Project during a SEQR process that has taken more than four years. On balance, and after careful consideration of all relevant documentation and comments, the Lead Agency believes it has more than adequate information to evaluate all the benefits and potential impacts of the Project as a basis for considering whether to undertake the Project.



## FINDINGS AND CONCLUSIONS SUPPORTING THE DECISION:

The GEIS provides a thorough and comprehensive analysis of the environmental, social and economic impacts and details appropriate mitigation measures for the Preferred Alternative as well as the No Action Alternative, Development in Accordance with Existing Zoning Alternative, and Maximum Development Alternative. A summary of the relevant environmental impacts, facts and conclusions disclosed in the GEIS are described below.

### 1. Land Use and Zoning

The GEIS examined the Project's consistency with existing land use controls and local development plans and policies to evaluate Project components alongside the visions for this area of the City and Town. The predevelopment land use within the Site is industrial. The existing zoning for the majority of the Site (64.37 acres) is classified as Industrial (I-1 in the City and I in the Town). The remainder of the developable portions of the parcel is zoned medium density residential. The zoning for the adjacent parcels is medium density residential except for the South Hill Business Park PDZ to the south of the Site. The City of Ithaca adopted its Comprehensive Plan in September 2015 and PUD Zoning in October 2014. The Town of Ithaca adopted its Comprehensive Plan in September 2014 and has been using Special Land Use Districts (now called PDZs) since August 1984. There are currently 14 Special Land Use (Mixed-Use) or PDZ districts within the Town of Ithaca.

#### **Potential Impacts**

- The Project will create land use impacts in terms of both form and intensity of uses. The current pattern of land use promoted by the existing land use regulations resulted in a large industrial complex.
  - The most substantial change in land use is the allowance for residential use where no residential development is currently permitted.
  - In terms of form, the existing zoning does not regulate the size, scale, massing or disposition of buildings on the parcel in relationship to the surrounding land uses. In contrast, the Project's proposed PUD/PDZ Zoning Code will do so.
- The most important potentially significant adverse impacts of a built-out landscape of conventional zoning is the loss of the character along NYS Route 96B.
- Existing zoning will be impacted by the Project through the rezoning of the Site as a PUD and PDZ.
  - Rezoning the City portion of the post-industrial Site as a PUD will allow the Project to respond to and help implement planning and land-use concepts being set forth in the City's Comprehensive Plan which include the following impacts or opportunities:
    - Regional sprawl would be avoided by providing a mixed-use development that bridges the City and Town, the Region, and Downtown.
    - Revitalizing the under-utilized Site with a mix of uses, including housing, would extend and help implement the City's goals to provide more housing and revitalize the urban core.
    - Linkages between the City and Town, Ithaca College and Downtown, would be strengthened by physically allowing the Site to be a link between them. This would increase walkability and accessibility to Downtown, in turn reducing the overall carbon footprint of the greater community.
    - A trail on the western side of the Site would link the Site and the City to a greater network of trail connections within the City and beyond.
    - Natural areas will remain largely undeveloped to reduce stormwater runoff and increase the acreage of environmentally valuable and sensitive areas.
  - Rezoning the Town portion of the Site as a PDZ would allow the Project to respond to the planning and land-use concepts set forth in the Town's Comprehensive Plan, which includes the following impacts or opportunities:

- Sprawl would be avoided by providing denser clusters of housing with significantly smaller footprints than other developments in the Town can offer.
  - Environmentally valuable areas would be preserved and protected as an amenity for the neighborhood and surrounding community.
  - The CWD will promote human-scaled development and social connectivity within the Project and around the community by providing a connection for the trail network and between South Hill and Downtown Ithaca.
  - The new development will take on a cluster form avoiding environmentally and visually sensitive areas.
- CW1 Sub Area: This Sub Area is intended to remain undeveloped. With greater intensity of uses adjacent to this Sub Area, there is a potential impact on the natural condition of this area including the introduction of recreational trails bringing people within close proximity of a natural area that has seen little human activity. There could be potential stormwater impacts in the CW1 Sub Area as a result of the changes to intensity of land use in the CW2 Sub Area upstream.
  - CW2 Sub Area: A potential impact on the surrounding natural areas could result from dense residential development in what is currently an undeveloped wooded area.
    - Having residential uses in close proximity to the CW1 Sub Area could increase the amount of human activity within the natural wooded area.
    - The increase in intensity of use will also impact the few off-site residential uses adjacent to that area, but should have little effect on the commercial use to the south of the Site or Ithaca College campus to the southeast.
    - There will be a larger number of people moving by foot and by car between the Site and the surrounding neighborhoods placing more stress on existing sidewalk and street infrastructure.
  - CW3 Sub Area: A potential impact to the CW3 Sub Area includes impacts to the character of the district and the relationship of new buildings and uses in close proximity to the existing surrounding uses, specifically the Hillview-Turner place neighborhood.
    - There will be a larger number of people moving by foot and by car between the Site and the surrounding neighborhoods placing more stress on existing sidewalk and street infrastructure.
  - CW4 Sub Area: The possibility of creating very large buildings with significant visual impact exists by right without many restrictions in place.

### **Mitigation**

- The rezoning of the parcel to a PUD/PDZ with the establishment of Sub Areas and the adoption of Design Guidelines will mitigate impacts to the form and intensity of land uses.
  - Buffers will be maintained in areas adjacent to existing residential zones to control the intensity of development.
  - Form and intensity of uses will also be mitigated by following site plan review procedures.
  - Buildings within a 100-foot buffer along NYS Route 96B will be limited to a maximum of four stories.
  - In conjunction with the CWD PUD/PDZ Zoning Code approval, a Conceptual Site Layout Plan will be submitted to the Town and City Planning Boards for preliminary site plan approvals pursuant to §270-185 of the Town Code and §276-6 of the City Code.
  - In the event a final Site Plan submitted for approval is not in substantial agreement with the Conceptual Site Layout Plan and/or other Project thresholds are exceeded, the Town and City Planning Boards - or whomever is the proper lead agency for the Project component under consideration - will have the opportunity to determine whether such changes warrant additional environmental review.
- The Comprehensive Plans both describe the use of new mixed-use zoning as a tool to implement shared land use goals for the Site.

- The preservation of neighborhood is addressed through the development of the CWD PUD and related Design Guidelines for the City and PDZ in the Town.
  - In contrast to the existing pattern of development, the Project calls for compact development, which integrates land uses, creates a strong multimodal network of streets and paths, and makes for a more efficient use of infrastructure and existing services.
  - The Design Guidelines will mitigate potential land use impacts by encouraging development that will contribute to the CWD's unique character. Moreover, the Design Guidelines establish Site Plan Review procedures with specific regulations for the district.
  - The Design Guidelines have been prepared to provide clear and useful guidelines for the design, construction, review, and approval of growth in the CWD. These standards will help ensure that new buildings are compatible with either the existing historic industrial buildings or the character of the immediate surrounding neighborhoods. The Design Guidelines further address Site and building standards for each of the proposed Sub Areas and identify site planning, thoroughfares, lighting, signage, and building design requirements.
- CW1 Sub Area: Retained a public passive recreation space. The Design Guidelines effectively prevent the development of the CW1 Sub Area. There is no proposed specific mitigation for this Sub Area because the preservation of this land as a natural area is in fact part of the proposed mitigation for the other Sub Areas.
  - Any potential buildings in CW1 would require design review by the Planning Board prior to approval.
- CW2 Sub Area: Allow the development of any Residential use. In response to DGEIS comments, this Sub Area was split into two subsections.
  - To the extent possible, the use of open space preservation techniques, such as the clustering of dwelling structures, is encouraged for the undeveloped land within the Site to mitigate impacts from dense development in other Sub Areas. This clustering technique preserves the significant natural areas in the CW1 Sub Area and specific designated trail linkages can be established to existing open space areas throughout the Site during site plan review.
- CW3 Sub Area: Same as CW2 (excluding detached dwellings) and including any Assembly, Business, Educational, Factory, Mercantile or Storage use as defined by The Building Code of New York State. This Sub Area was split into three subsections in response to DGEIS comments. Buffers between the CW3 Sub Area and the existing residential uses are included in the Design Guidelines to mitigate potential impacts from higher density uses in relatively close proximity to lower density uses.
- CW4 Sub Area: Any Business, Factory or Storage use as defined by The Building Code of New York State.

## 2. Land

The GEIS examined the Project's potential impacts to land for the 95 acre parcel including in-situ soils, surface geology, and topography. Natural features of the Site include exposed bedrock along the steeper slopes, and a heavily wooded area in the southern portion of the Site. The Site contains mostly Lordstown series soils, similar to other hillsides in the area. The underlying in-situ soils have high bearing capacity which makes the construction of buildings acceptable. The Site slopes steeply east-to-west with the highest elevation, of approximately 800', at the top of South Aurora Street and the lowest, of approximately 440', where the Site meets Spencer Street. Approximately 50% of the Site contains slopes of less than 20%, which are deemed appropriate for development.

## **Potential Impacts**

- The Project will utilize standard cut and fill excavation methods during construction of the new roads, parking areas and building pads. The potential option for grading of the Site estimates 68,000+ cubic yards of fill will be necessary to balance the Site.
  - This bulk cut and fill estimate provides total volumes and does not account for construction materials that are required to be imported nor does it include the void volume required for below-grade structures such as storage and parking areas.
- The amount of disturbance for Phase I is limited due to the intent to start initial occupation at the Site in the buildings that require the least amount of preparation. The impacts associated with the Phase I buildings are as follows:
  - Building 21: Limited to the minor sidewalk and parking area restorations required to occupy the building.
  - Building 24: Limited to re-surfacing existing pavement areas and establishing pedestrian access into the building from parking areas.
  - Buildings 33/34: Depending on parking requirements of future tenant(s), the development of the south parking areas which includes the demolition of the existing metal storage building and construction of two parking areas.
- As with all earthwork operations, the full development of the Project will expose soils which will increase the potential for short and long-term erosion impacts and potential loss of sediment from the Site.
  - Short term erosion impacts are mainly due to the site construction phase.
  - Potential long-term erosion impacts are due to improper construction techniques including non-compliance with State Pollutant Discharge Elimination System (SPDES) General Construction (GC) permit requirements for the stabilization of stockpiles or other idled disturbed areas for periods exceeding 14 days as well as improper diversion of stormwater flows through unstabilized areas of construction.
- Potential impacts to adjacent parcels are anticipated to be limited due to the distance of the new development from property lines. Other potential impacts include working in areas with environmental concerns which are discussed in further detail under Public Health and Environment.
- Potential impacts for development beyond Phase I, listed by Zoning Sub Area, are as follows:
  - Sub Area CW1: Impacts to soils and topography in the CW1 Sub Area are limited to the sections where recreational trails or associated structures are constructed. Disturbance due to the development of recreational features will be minimal. The largest potential impacts to this Sub Area are due to the erosion potential associated with the development of Sub Area CW2 located upgradient from CW1.
  - Sub Area CW2: This Sub Area contains the potential for the most new development within the Site and also the most potential impacts to Site soils and topography. CW2 will be terraced to develop multi-family residential units configured in multiple stories that benefit with the use of the sloping grades to construct structured parking under certain residential buildings. Based on the previous geotechnical studies, it is anticipated that blasting will not be required. Heavy construction equipment will be used to remove as much of the fractured/weathered bedrock as feasible. If additional rock removal is required, blasting may be necessary. The in-situ soils in CW2 are highly erodible.
  - Sub Area CW3: The CW3 Sub Area consists mostly of terraced parking areas that will be redeveloped for buildings, parking areas and roads. The portions of CW3 that are anticipated to include new buildings and parking areas are uphill of the existing developed portions of the core. The Conceptual Site Layout Plan was developed to benefit from the existing terraced areas of the Site to limit total earthwork.
  - Sub Area CW4: Impacts to CW4 are limited to the potential construction of two parking areas that total less than 1 acre of disturbance. This is a minor amount of disturbance and would normally not require a NYSDEC SPDES GC permit. However, since this is

part of a plan of common development, a full SWPPP will be required for this portion of work.

### **Mitigation**

- Future development of new areas will be located primarily in areas with slopes less than 20%. Sub Area CW1, which contains areas with slopes greater than 20%, will be preserved. Development will be relocated away from areas with unstable soils.
  - Such topographic restrictions on future development minimizes erosion and potential impacts to topography while reducing the amount of cut and fill required.
- The Conceptual Grading Plan prepared with the goal of balancing the amount of cut and fill minimizes the import/export of materials to and from the Project.
  - Detailed grading plans of each subsequent phase will be developed to mitigate the excess fill requirements.
  - Subsoils will be tested by a certified laboratory.
  - Construction specifications will be developed based on the laboratory analysis and recommendations of the geotechnical testing firm.
- Side slope grades of all cut and fill areas are set to minimize the potential for future erosion. Phase I Site Plan drawings include an existing conditions survey performed by a NYS Licensed Surveyor.
  - Subsequent Site Plans will also include existing conditions surveys.
- Grading and Erosion Control plans and geotechnical reports for subsequent phases will be developed during the Site Plan approval process.
- Demolition and Grading Plans will be developed as part of all Site Plan submissions.
  - Grading plans will be developed to balance cut and fill requirements with the design intent of disposing of all excess material on-site.
  - Excess soils created by the excavation for below-ground structure parking and storage levels will be utilized as fill around adjacent structures and, if suitable, in pavement areas.
  - Complete construction specifications for earthwork and erosion control will be developed for each phase.
- Coverage under the NYSDEC SPDES GC Permit (GP-0-015-002) for erosion and sediment control will be obtained. A SWPPP will be developed, and will require or implement the following:
  - Specific limits of disturbance (LOD) will be defined for each Phase to maintain impacts within the permitted area.
  - Develop Erosion & Sediment Control Plans as part of all Site Plan submissions.
  - Minimize stream impacts from erosion by minimizing earthwork within 50 feet of the banks as well as protecting from excess stormwater runoff during construction.
  - Minimize the areas of disturbance for slopes exceeding 20%. Maintain those areas in a vegetated state to the maximum extent practicable.
  - Determine slope stability by a qualified engineer for development of slopes in excess of 3:1. Retaining walls, turf reinforcement mats or other Best Management Practices (BMPs) will be designed by a qualified engineer for slopes exceeding 3:1.
  - Inspect for site stabilization by a qualified inspector as part of the SPDES GC Permit to achieve the same.
  - Obtain written approval from the MS4 prior to the disturbance of five acres or more at any one time.
  - Obtain certification by a licensed professional engineer that attests to the construction and implementation of the SWPPP upon completion of the site construction portion for the individual phases.
- Follow any applicable excavation management plan approved by NYSDEC to manage appropriately any impacted soils encountered during construction.

- If necessary, a system of controlled blasting would be specified that includes methodology, mitigation and monitoring requirements.
  - The blasting specifications will be developed in accordance with NYSDOT Geotechnical Engineering Manual: Procedure for Blasting.
  - All Local, National Fire Protection Association (NFPA), Occupational Safety and Health Association (OSHA) and NYS Department of Labor (NYSDOL) requirements will be followed.
  - A written blast plan will be developed and pre-operations meetings will be conducted with the Project Sponsor, Engineer, Contractor, and City and Town Staff.

### 3. Water Resources

The GEIS analyzed the impacts to water resources that would be associated with each of the alternatives. In particular, the GEIS analyzed the potential impacts associated with stormwater management, groundwater and hydrogeological conditions. There are three unnamed tributaries that converge and run east-to-west within the Site to Six Mile Creek, which is located approximately 500 feet to the northwest of the Site. No other surface water or ephemeral water features are known to exist on the Site. There are no Federal or State mapped wetlands inventoried on the Site. No wetlands were encountered on field walks in the developable areas of the Site. Groundwater at the Site includes a shallow fractured bedrock horizon and a deeper, competent bedrock in which groundwater resides in a fractured vertical network. Groundwater may also be found in certain locations within the thin overburden and fill material located throughout the Site. Pockets of “perched” groundwater can be encountered in the overburden areas. On-Site stormwater infrastructure is in place from previous development, all of which predate current State, Local, and Federal stormwater regulations.

#### **Potential Impacts**

- Surface Water and Hydrogeological Setting: It is anticipated that there will be four crossings of the unnamed tributary proposed for the Project, all in CW2, that could result in impacts typical of crossing intermittent streams without proper mitigation. Such impacts include erosion or bank destabilization resulting in blockage or redirection of flow through the stream.
  - Even though the potential of on-Site flooding is minimal because of topography and existing grades, the increased amount of impervious surfaces will consequently increase stormwater peak runoff rates that potentially will impact downstream stormwater conveyance systems.
  - The total volume estimated during the 100-year design storm event increases by 2.992 acre-feet. Even assuming no infiltration or evapotranspiration, the potential increase in the water surface elevation for Cayuga Lake is immeasurable (0.00084 inches).
  - Additional potential impacts include erosive velocities of peak runoff rates depending on the discharge location.
- Groundwater: The Phase II ESA indicates areas of perched groundwater due to the on-Site bedrock. This will potentially impact structures with subgrade levels, specifically structured parking.
  - Construction may be potentially impacted by high groundwater or perched pockets of groundwater that may be experienced at various locations.
  - Groundwater may impact the design of the foundation including the selection of materials as well as construction methods.
  - Groundwater dewatering may also impact downstream drainage structures. Because of the impacts to groundwater from historic uses, special handling of groundwater at certain locations on the Site may be necessary.
- Stormwater: The creation of impervious surfaces is the main cause of increased stormwater runoff rates and impacts to stormwater quality.

- There are numerous existing catch basins and stormwater sewers to collect and transport stormwater runoff along with grass swales. The full extent of the system and its connection and outfalls are currently unknown.
- The Conceptual Site Layout Plan anticipates an increase of impervious surfaces of 11.2 acres (from 17.3 acres to 28.5 acres). The Project will maintain 35.75 acres, or 37% of the Site, as pervious.
- The runoff flow and volume estimates for POS-A are anticipated to increase by approximately 5% due to the utilization of the green areas adjacent to SR 96B.
- POS-B through POS-D consists of areas that are mostly redevelopment and are likely to see negligible differences in the estimated runoff rates and storm volumes.
- POS-E, which includes all of zoning Sub Area CW1 and CW2, will be the area with the most new development and therefore will have the greatest increase in stormwater volume. The runoff rates for drainage Sub Areas E-3 and E-4 will peak higher but earlier in the storm period. This will actually reduce the total peak stormwater runoff rates for POS-E due to the much larger upstream area (Sub Areas E-1 and E-2).

### **Mitigation**

- The Town Code defines required setbacks for development along streams. A total setback of 50 feet for any new development along a stream will be maintained for this Project as required by Town Code within the entire Site.
- All stream crossings will be designed in accordance with NYSDEC standards.
- The Generic SWPPP for the entire Site and SWPPPs for individual phases will provide specific mitigation for surface water/hydrogeological resources.
- Stormwater quantity and quality mitigation may include the following:
  - The addition of more diversion swales.
  - Use of the guidance for redevelopment projects in the NYS SWMDM Chapter 9.
  - Runoff reduction practices in accordance with the NYS SWMDM Chapter 3.
  - Utilization of traditional stormwater infrastructure such as curb, gutter and storm sewers for collection/conveyance.
  - Mitigation of stormwater velocity to insure protection from erosive flows including proper groundcover protection (biological as well as structural).
  - Green infrastructure mitigation which may include bioretention, planters, rain gardens, green roofs, and other infiltration practices depending on the suitability of the in-situ soils to mitigate both stormwater quantity and quality impacts.
  - On-Site storage and reuse of stormwater flows as reduction practices such as repurposing the on-Site underground water storage tanks near Driveway III or creation of a new storage area in Sub Area CW2.
- Alternative stormwater quality mitigation practices known as hydrodynamic systems such as gravity and vortex separators will also be considered during site plan approval.
- All existing stormwater utility structures will be mapped in accordance with the SWPPP.
- All new stormwater facilities will be designed in accordance with the most current version of the NYS Stormwater Management Design Manual.
- Stormwater facilities will be reviewed for capacity during individual site plan reviews.
- The NYSDEC will issue a ROD Amendment that identifies the required remedial work to support mixed-use development and address previously unidentified potential impacts to groundwater and stormwater from existing contamination in compliance with the Inactive Hazardous Waste Site Program regulations and guidance documents. Typical remedial approaches associated with any impacts to groundwater include:
  - Excavation and off-Site disposal of source area materials to reduce or prevent contaminants from impacting stormwater and groundwater.
  - Capture/treatment of impacted surface or groundwater.
  - Solidification/stabilization or capping of impacted soils to reduce or eliminate leaching.
  - In-situ chemical treatment of impacted soil and/or groundwater.

- Routine monitoring of groundwater.
- Implementation of any applicable groundwater management plan approved by NYSDEC for groundwater encountered during construction.
- The proposed Phase I mitigation is depicted on the Site Plan Drawings and includes:
  - Reduction of impervious areas within the Phase I project limits.
  - Rehabilitation of existing stormwater collection system in the existing road and parking areas in the Phase I Project limits.
  - Construction of stormwater collection systems in new parking areas.
  - Conservation of natural areas directly adjacent to Phase I.
  - Installation of rain gardens and/or bioretention areas in and adjacent to parking areas.

#### 4. Vegetation and Fauna

The existing vegetation and fauna on the Site have been surveyed as part of the GEIS. Seventy-seven acres, or approximately 80% of the Site, are currently forested (34 acres/35%) or vegetated state (43.7 acres/45.5%), while 17.3 acres, or 20%, are comprised of buildings, roads, and other impervious surfaces. The New York State Natural Heritage Program (NYSNHP) was consulted to obtain a summary of rarities found in the Site vicinity. A qualified biologist was unable to find any of these, or any other species, listed as Rare, Threatened, Special Concern, or Endangered in NYS by NYSNHP or NYSDEC within the Site.

##### Potential Impacts

- There are potential impacts to plant and wildlife habitat, particularly with regard to the removal of some plants and habitat areas for the construction of the proposed new development.
- The Conceptual Site Layout Plan anticipates an increase of impervious surfaces of 11.2 acres (from 17.3 acres to 28.5 acres).
  - The vegetated area will decrease by approximately 11.2 acres, resulting in an impact to existing permeable surfaces. A majority of this decrease is planned to occur in areas containing invasive plants identified throughout the Site, resulting in fewer quantities of invasive species on Site. The Project will maintain 35.75 acres, or 37% of the Site, as pervious.
- With the reduction of vegetated areas, wildlife habitat may also be impacted. The qualities of forested areas vary, with some being highly disturbed.
- As a result of development in CW2, CW3, and CW4, fauna found in these zones of lesser habitat quality will be displaced, likely relocating to CW1 where forests containing higher habitat quality will be preserved. Development may have an impact on the native deer population.
  - DGEIS Table 5.4-1 describes the acreage of vegetative cover lost in each Sub Area as a result of the Project:

Sub-Areas	Existing Area (Acres)	Developed Area (Acres)	Change (Acres)	Change (%)
<b>CW1</b>				
Appalachian Oak-Hickory	16.68	16.68	-	0.00%
Successional Forest	7.18	7.18	-	0.00%
<b>Total</b>	23.86	23.86		
<b>CW2</b>				
Appalachian Oak-Hickory	6.23	2.83	(3.40)	-54.57%
Successional Forest	0.33	0.26	(0.07)	-21.21%
Successional Old Field	14.61	2.51	(12.10)	-82.82%



Lawn / Garden	-	6.71	6.71	
Impervious	-	8.86	8.86	
<b>Total</b>	21.17	21.17	-	
<b>CW3</b>				
Successional Forest	14.47	9.67	(4.80)	-33.17%
Successional Old Field	0.40	0.12	(0.28)	-70.00%
Formerly Cult. Successional Forests	2.71	0.89	(1.82)	-67.16%
Lawn / Garden	3.65	10.99	7.34	201.10%
Impervious	18.50	18.06	(0.44)	-2.38%
<b>Total</b>	39.73	39.73	-	
<b>CW4</b>				
Appalachian Oak-Hickory	0.13	0.13	-	
Successional Forest	4.14	2.72	(1.42)	-34.30%
Formerly Cult. Successional Forests	0.42	0.11	(0.31)	-73.81%
Lawn / Garden	-	1.37	1.37	
Impervious	5.58	5.94	0.36	6.45%
<b>Total</b>	10.27	10.27	-	
<b>Entire Parcel</b>				
Appalachian Oak-Hickory	23.04	19.64	(3.40)	-14.76%
Successional Forest	26.12	19.83	(6.29)	-24.08%
Successional Old Field	15.01	2.63	(12.38)	-82.48%
Formerly Cult. Successional Forests	3.13	1.00	(2.13)	-68.05%
Lawn / Garden	3.65	19.07	15.42	422.47%
Impervious	24.08	32.86	8.78	36.46%
<b>Total</b>	95.03	95.03		

- The following describes what forest types will be impacted through full, partial, or selective removal resulting from the Project by Sub Areas:
  - CW1: Appalachian Oak-Hickory forest is a native, older growth forest containing high-quality species and ecological habitat. All of this forest type located within CW1, which constitutes 16.68 acres of the total 23.04 acres, or approximately 72.4% of this forest type on the Site, will be preserved.
  - CW2: This Sub Area consists of two types of vegetative cover:
    - Successional Old Field consisting of successional shrubs and young trees. The make up of this vegetative cover largely consists of invasive species as is typically found on disturbed sites. Portions of this vegetative cover will be fully removed where new development will occur, and other areas will be selectively removed and replanted as an open space amenity for CW2.
    - Appalachian Oak-Hickory as described in CW1 is in the north to northwestern portions of this Sub Area, encompassing approximately 6.23 acres. A portion of this vegetative cover is likely to be disturbed by proposed development in CW2.
  - CW3: This Sub Area consists of three types of vegetative cover:

- Successional Forests, which are characteristic of disturbed sites, consisting largely of invasive and pioneer species. These areas are located in the eastern area of CW3. This forest type is also located around the existing structures in CW3.
- Formerly Cultivated Successional Forest containing species that have been cultivated in the past and have naturalized and become invasive. Some species include Barberry and Norway Maples. These zones are largely located at the junction between single-family homes and the Site. This vegetative cover is found in the area around Building 21.
- Maintained Lawns/Garden Areas are largely lawns with some cultivated plants. This vegetative cover is found in the northeastern area of CW3.
- Portions of the vegetative cover described above will be fully removed where new development will occur, and other areas will be selectively removed and replanted as an open space amenity for CW3.
- CW4: Successional Forests, as described in CW3 above. This vegetative cover is found around the existing structures in CW4. As with CW3, portions of this vegetative cover will be partially or selectively removed in area will the redevelopment of the existing structures will occur.

### **Mitigation**

- Forested and cultivated areas on portions of the Site, which have historically been disturbed, are of poor quality and contain numerous invasive species. Although new impervious areas will be constructed, abandoned existing impervious areas – walks, parking lots, and stairs – that no longer serve a purpose, will be removed and replaced with vegetated areas of higher quality.
- Phase I is designed to minimize impacts to the existing trees, however there are some removals necessary. A majority of trees which will undergo removal are either invasive or naturalized species with little ecological value for native habitats.
  - A detailed tree survey will be performed when development occurs in conjunction with site plan review to minimize impacts to older trees.
- Mitigation for an increase of the Site’s impervious area resulting from the Project includes the designation of a portion of the Site as a new Sub Area known as CW1.
  - The Project Sponsor is willing to offer mechanisms such as appropriate deed restrictions or conservation easements to memorialize the dedication of the CW1 Sub Area. A majority approximately 72% of the high quality Appalachian Oak-Hickory forest is located in the CW1 Sub Area, and will be preserved as an amenity and recreational area.
  - The designation of the CW1 Sub Area will minimize disturbance in an area with high quality native vegetation, provide the means for the development of long term conservation plans in specified areas of the Site, and landscape and tree preservation standards.
  - Any wildlife that may be disturbed due to the development of other Sub Areas will likely relocate to CW1 where forests containing higher quality habitat will be preserved. Under the rezoning of the Site, this area is to be maintained as natural forest that will be preserved in perpetuity.
  - Additional trails will be developed to allow the recreational and educational use of the higher quality forested CW1 Sub Area.

## **5. Public Health and Environment**

The GEIS evaluated potential impacts to public health and the environment that the Project and each of the alternatives may have due to existing contamination. The existing very comprehensive environmental investigation data generated by the property owner and the Project Sponsor provide sufficient data to analyze potential significant impacts from identified areas of concern (AOCs) as a

result of the Project and the alternatives as well as an analysis of mitigation measures to protect human health and the environment from impacts that may arise from redevelopment of the Site.

### **Potential Impacts**

- Multiple AOCs were found to have contaminants exceeding their relevant cleanup standards for soil and groundwater, including but not limited to Trichloroethylene and other VOCs, arsenic, barium, cyanide, polychlorinated bi-phenyls, and petroleum products. If not addressed over time these contaminants can have impacts to public health and the environment.
  - Specifically, impacts in soil can leach to groundwater or if within the surface soil can be a potential contact issue for people on site or off site if erosion occurs.
  - Impacts in subsurface soils can be a concern in the event the future ground intrusive work encounters those impacts and they are not properly handled.
  - Impacts in groundwater can migrate off-Site and can present in surface water down gradient in locations where bedrock fractures outcrop at the surface creating seeps.
  - Volatile Organic Compounds (VOCs) impacting soils or groundwater beneath a building can impact indoor air through soil vapor intrusion.
- The Lead Agency understands that in anticipation that the Project will move forward in a manner consistent with the Conceptual Site Layout Plan, NYSDEC has approved an Interim Remedial Measure (IRM) Work Plan using, in some instances, the Soil Cleanup Objective (SCO) that applies to the proposed use of an area based on the Conceptual Site Layout Plan. In other instances, the Protection of Groundwater SCO is proposed.
  - As part of implementing the IRM, select locations along the sanitary sewer lines will be investigated to assess pipe integrity and potential impacts in soil beneath or adjacent to the sewer lines.
  - Any areas where soil impacts exist above the applicable SCOs will need to be remediated.
- The Lead Agency further understands that the property owner performed a Boundary Reassessment Study that assessed conditions on the 36.76 acre undeveloped portion of the Site to the south of the creek that runs east/west across the Site and produced evidence that prior operations and/or disposal did not take place in that area. As a result, NYSDEC realigned the IHWDS boundary to exclude that southern portion of the Site from remedial requirements of the IHWDS Registry. Because of the presence of soil vapors in the vicinity of the sewer lines running through that portion of the Site, the property owner filed a declaration of covenants and restrictions requiring that the potential for soil vapor intrusion be addressed to the satisfaction of NYSDEC and NYSDOH whenever any habitable structures are built within an 80 feet wide area around the sewer lines.
- The current Record of Decision (ROD) calls for the Site to be remediated to allow only for industrial use. Therefore, NYSDEC will need to amend the ROD to allow for the proposed mixed uses at the Site contemplated under the Project. The requirements for remediating the Site will be more stringent for mixed-use with a residential component than industrial or commercial uses alone. As a result, the Project will improve the existing impacts from the Site's historic uses and the Preferred Alternative will be more beneficial from a public health and environment perspective than the No Action Alternative and the Existing Zoning Alternative.
- This more stringent cleanup will mitigate impacts to the environment, public health, and surrounding residences by: (1) completing the remediation of more contaminants for a mixed-use than under an industrial use; (2) addressing previously unknown contaminants thus significantly reducing the potential for migration downgradient and impacting the surrounding community and environment; and (3) establishing proper management of the Site over time.
- Specifically, for soils, the following AOCs will have to be addressed:
  - Former department 507 Degreaser Area (AOC1).
  - Building 24 area (AOC26).
  - Former salt baths area (AOC27).
  - Building 30/oil shed area (AOC28).

- Former propane storage area (AOC29).
- Rice paddy area (AOC30).
- Upper Parking Lot 6 area (AOC31).
- Former spray pond area (AOC32).
- Area east of Buildings 13A and 14 (AOC34).
- East of Building 24 (AOC35A).
- Building 11A (AOC35C).
- Near Parking Lot 4 (AOC35D).
- South of Parking Lot 3 (AOC35G).
- Parking Lot 3 (AOC35H).
- Former railroad right-of-way (LBA-SB-240) (AOC35K).
- Former railroad right-of-way (DS-1) (AOC35L).
- If the No Action or Existing Zoning alternatives were to be implemented only the industrial use and, in some instances, the protection of groundwater SCOs would apply leaving the following AOCs not remediated or remediated to a lesser extent for soils:
  - AOC29
  - AOC31
  - AOC32
  - AOC35A
  - AOC35G
  - AOC35H
  - AOC35K
  - AOC35L
- Additional environmental issues that will need to be addressed to a greater degree than under the No Action or Existing Zoning alternatives include:
  - Vapor intrusion for VOCs for existing buildings that will be routinely occupied.
  - Vapor intrusion for VOCs for any habitable structures to be built in the vicinity of the NCR sewer or Ithaca College sewer lateral within Sub Area CW2 and an eastern portion of CW3.
- Construction for the Project will encounter impacted soil and fill materials. These activities have the potential to impact the on-Site workers or the environment if not properly handled. Specifically, the Project may incur the following impacts:
  - General construction activity creating dust which could have contaminants such as heavy metals or SVOCs.
  - Excavations within areas of soil impacted with VOCs could create vapor emissions.
  - Dewatering to support excavations could result in the discharge of contaminated groundwater to surface soils, surface waters and/or the sewer system.
  - Construction workers could come into contact with impacted media.
  - Construction vehicles could transport impacted media off-Site to unregulated areas.
  - Stockpiled soils exposed to precipitation could transport contaminants through runoff.
- Typical remedial approaches discussed in the GEIS include:
  - Excavation and off-Site disposal of impacted soils, which has been and is currently being implemented by an IRM for 16 AOCs and previously employed for PCB impacted soils around a former transformer pad.
  - Placing a barrier or cap above soil/fill materials impacted with contaminant concentrations above the applicable SCOs. Again, a technique currently being implemented as part of a NYSDEC approved IRM.
  - Solidification/stabilization of impacted soils.
  - In-situ chemical treatment of impacted soil and/or groundwater.
  - In-situ or ex-situ thermal treatment of soil and/or groundwater.
  - Extraction and treatment of impacted groundwater and/or soil vapor.
  - Routine groundwater monitoring.

- Sub slab depressurization (SSD) systems and/or pressurization monitoring of buildings for mitigation of potential soil vapor intrusion.

### **Mitigation**

- An amendment to the existing ROD must be approved by NYSDEC. The amendment will facilitate development of the Site in a manner that protects public health and the environment under a mixed-use redevelopment scenario with a residential component.
- The specific final remedy or remedies at the Site will depend on the contaminant type, location and impacts to groundwater. The pros and cons of each remedial approach will be evaluated as part of the study of remedial alternatives that will be presented in a feasibility study and reviewed by NYSDEC in a separate regulatory process that results in the further amendment of the ROD. Specifically:
  - A feasibility study evaluating remedial approaches will be completed by the property owner for review and approval by NYSDEC. Following NYSDEC approval, all necessary remedial work will be completed to the requirements of the use for the specific area being developed or which will be affected by development.
  - All disturbances of soil (e.g., construction of new buildings, renovation of existing buildings, and/or utility work) within Sub Areas CW3 and CW4 and that portion of CW1 north of the creek that runs generally west to east across the Site will require the implementation of an SMP and associated Excavation Work Plan, Groundwater Management Plan and a Community Air Monitoring Plan (CAMP)
    - All such work would require an Environmental Monitor to complete appropriate oversight and management/characterization of disturbed materials. This includes continuous air monitoring for VOCs and fugitive dust, monitoring excavations for potential impacted media, sampling of all water and soil generated, stockpiling soils on plastic and covering with plastic until the final disposition of materials are determined and approved by NYSDEC.
    - These measures will address concerns related to VOC emissions, transport of impacted media off-Site, fugitive dust and run-off.
    - All work will be done by appropriately trained personnel, under oversight by an environmental monitor and with NYSDEC approval.
- The Site must be: (1) remediated to restricted residential, commercial and/or industrial SCOs, as appropriate based on the proposed uses at the Site, or to protection of groundwater standards if a particular area of the Site experiences impacts to groundwater above relevant standards; (2) subject to groundwater treatment and/or monitoring in those areas where groundwater impacts exceed applicable standards; (3) subject to appropriate use restrictions consistent with the proposed uses at the Site; (4) subject to appropriate prohibitions on the use of groundwater at the Site without approval from NYSDEC; (5) subject to development and implementation of an appropriate Site Management Plan (SMP); and (6) subject to on-going monitoring that institutional and/or engineering controls are being properly implemented and/or maintained.
- An SMP will be developed by the property owner and approved by NYSDEC after completion of the IRMs and issuance of the amended ROD which will set forth engineering and institutional controls for that portion of the Site north of the creek that remains on the IHWDS Registry.
  - The SMP and its components will be used to facilitate redevelopment and be amended as needed subsequent to installation of additional remedial systems and completing all remediation activities at the Site.
  - Implementation of an SMP will assure that the IRMs and other remedial actions selected through a feasibility study and amendment of the ROD will remain functional and effective.
  - Regular inspection of the caps, soil covers, and permanent erosion controls (e.g., gravel and vegetation) will identify potential problems and allow maintenance actions to be taken before more serious issues arise.

- An inspection procedure and frequency will be developed as part of the SMP to record and track Site conditions. Repair and maintenance procedures will be described to restore the deficiencies to the desired conditions. The plan will include routine maintenance activities such as sealing of asphalt cracks.
- The SMP will identify locations where contamination remains and will include procedures for assuring the institutional controls remain in place and effective.
- An excavation work plan will address proper management of soils and groundwater that may be encountered during any future ground intrusive activities. These plans will provide the process by which one properly manages both known and any unknown contamination that may be encountered during ground intrusive activities and require monitoring of such activities by an environmental professional.
- In addition to soil excavation and groundwater management, the SMP will contain a CAMP, and operation, monitoring and/or reporting requirements specific to the remedial alternatives selected by NYSDEC for the Site.
- Finally, the SMP will contain operation, maintenance and monitoring requirements for treatment systems and/or monitoring programs for groundwater treatment systems or soil vapor intrusion systems that may be employed at the Site as part of the final remedy along with a schedule of regular reporting on the activities conducted under the SMP to NYSDEC.
- Enforcement of the SMP requirements will be through the filing of an environmental easement covering the Site.
- Areas of impacted concrete (Buildings 4, 8, 13A, 14 and 34) will require remediation which will most likely take the form of removal or capping.
- In the event air monitoring indicates fugitive dust or VOCs, appropriate vapor and/or dust suppression actions will be taken.
- Occupation of existing buildings and construction of new ones in the CW3 and CW4 Sub Areas will require the Project Sponsor to address the potential for soil vapor intrusion via mitigation and/or monitoring. Specifically, for the Preferred Alternative this includes:
  - Mitigation of Buildings 1, 2 (basement portion), 3, 4, 5, 6 and 6A (remaining portions), 8, 9, 10, 18, 21, 24, 33 (remaining portions) and 34.
  - Monitoring of Buildings 13A and 17.
  - Building 2 (upper portion) would require additional analysis to determine whether additional actions are required to reduce exposure as part of the feasibility study.
  - Evaluation of areas designated for new construction in CW3 and CW4 Sub Areas for the potential for soil vapor intrusion followed by NYSDEC and NYSDOH approval.
  - Compliance with the Declaration of Covenants and Restrictions that requires evaluation of areas designated for new construction in the CW2 Sub Area for the potential for soil vapor intrusion when habitable structures are planned to be constructed in the vicinity of the former NCR and Ithaca College sewer lines.
- Filing and compliance with an environmental easement that: (i) restricts the use of the portion of the Site still on the IHWDS Registry to Restricted Residential, Commercial and Industrial uses (as those terms are defined by the relevant NYSDEC regulations); (ii) restricts the use of groundwater without NYSDEC approval; and (iii) requires the implementation of an SMP.
- The property owner has commenced NYSDEC approved IRMs to address 16 different AOCs at the Site based upon cleanup objectives consistent with the Conceptual Site Layout Plan. All approved IRMs will be completed in compliance with NYSDEC-approved plans.
- Mitigation also includes development of emergency action plans and compliance with Community Right to Know requirements by tenants using hazardous substances.
  - Pre-demolition/rehabilitation surveys will be performed during each phase of development on those buildings where warranted based upon historical use, visual evidence, and prior investigation results to further assess the need for special management of demolition debris.

## 6. Historic and Archaeological Resources

The GEIS evaluated the potential impacts on Cultural Resources listed on or eligible for listing on the State or National Register of Historic Places (“S/NRHP”) in and in the vicinity of the Project Area. This included evaluating potential effects to architectural and archaeological resources. A Determination of Eligibility (DOE) was prepared for the Site for review by the New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP) to determine whether the above-ground historic architectural resources are eligible for listing on the National Register of Historic Places. The Site has been determined eligible for the National Register of Historic Places. A Phase 1A archaeological survey was conducted under the supervision of a Registered Professional Archaeologist and in accordance with the NYSOPRHP’s Phase 1 Archaeological Report Format Requirements. Archaeological investigations did not result in information that would significantly add to the understanding of the construction, function, or use of the manufacturing facility and no additional archaeological investigations were recommended.

### **Potential Impacts**

- In order to bring air and light into the redeveloped complex, and provide sufficient space for circulation, selective demolition is planned, potentially resulting in impacts to the existing structures through partial or full removal. These buildings are: Buildings 3A (1920s), 4A (1920s), portions of 6 (1950s) and 6A (1940s), 8A (1920s), 9 (1900s), 10A (1940s), 11A (1940s) and 14(1940s).

### **Mitigation**

Currently the Project Sponsor is not seeking historic tax credits as originally considered during the DGEIS process. Subsequent consultation with NYSOPRHP determined that the redevelopment of the buildings as mixed-use structures utilizing the Architecture 2030 goals precluded coverage under the historic tax credit system. The change of use and redevelopment of the existing buildings in accordance to current energy/buildings codes will take precedence over the following historic mitigation:

- The Project Sponsor is pursuing a variety of options to retain the historical character and significance of the CWD by retaining key individual structures, including the pre-1965 portions of the factory building (all sections except 13B, 34 and 35), the Office Building (21), and the Office/Commercial Building (24), to mitigate any potential impacts to the existing structures resulting from the selective or full demolition of buildings.
- The Secretary of the Interior’s Standards and Guidelines serve as a methodology to identify, document, and evaluate which existing structures and areas within the Site are appropriate for preservation and rehabilitation. These guidelines help determine how best to accommodate building removal, how best to maintain/rehabilitate significant structures, and which how to integrate complementary (adjacent and out-lying) new development. The Project Sponsor has and will continue to employ these guidelines where feasible.
- Pursuing certification by the USGBC for LEED ND, a framework for identifying, implementing, and measuring green building and neighborhood design.
  - Credits 6 and 7 require the retention of at least 20% of the surface of historic buildings except when authorized by the Ithaca Landmarks Preservation Commission and/or NYSOPRHP and to the extent allowed while maintaining compliance with applicable energy codes and goals set forth under Utilities and Effects on the Use and Conservation of Energy Resources.
- Restoring and/or rehabilitating existing structures-to-remain in a way that preserves, reflects, enhances and promotes the inherent historic and architectural significance of these selected buildings.
- Cleaning and repairing existing exterior walls as individual buildings are redeveloped and occupied.
- Repairing, enhancing and restoring existing fenestration at existing openings.

- Replacing existing windows (deteriorated to the point of inoperability) to closely emulate the design, pattern, color, and perhaps material construction of what currently exists on various existing CWD structures.
- Wherever possible, restoring and maintaining the interior character of key existing structures with additional modifications developed to meet the needs and requirements of potential tenants as well as applicable building codes.
- Enacting architectural guidelines, as described in the PUD/PDZ Design Guidelines, that help establish a common character for new Site development and which will in turn complement the rhythm, variety, proportion, size, and scale of the existing and remaining historical structures.
- Working with an appropriate professional to adequately photo document those structures that will be demolished, so that a historical record of the architecture will remain.
- Selectively preserving historically significant elements of buildings, both internal and external, that contribute to the historical narrative of both the structure and the Morse Chain Factory itself.

## 7. Transportation and Circulation

The GEIS analyzed the potential impacts related to the local transportation network. A broad study area was scoped in consultation with City and NYS Department of Transportation (NYSDOT). The study locations consist of 30 existing intersections. The study intersections were observed during both peak intervals to assess current traffic operations. Pedestrian, bicycle, and transit infrastructure are key to providing a complete transportation system for residents and visitors of the City/Town. Within the City alone, approximately 42% (15% Town) commute to work via walking (2012 American Community Survey 5-year Estimates). The TCAT system provides transit service for over 100,000 Tompkins County residents. Ridership has been increasing steadily over the past several years, with a 6.3 percent increase in trips between 2011 and 2013. Of the 33 routes that service the County, Route 65 provides rural commuter service along NYS Route 96B with stops at the nearby South Hill Business Park and Longview and Route 11 provides downtown coverage and services Ithaca College and travels along Coddington Road/Hudson Street. The Site is currently accessed via four drives along NYS Route 96B as well as a connection at Turner Place. Marginal access is also available via S. Cayuga Street.

A Traffic Impact Analysis was prepared to assess existing and future traffic operations on the street network in the vicinity of the Site, to evaluate potential traffic impacts resulting from the Phase I development and the full build out of the Site, and to identify appropriate mitigation measures to avoid or minimize potential impacts to the transportation system (the Traffic Impact Analysis is included in Appendix I of the DGEIS).

### **Potential Impacts**

- The Project significantly increases development density in an area characterized by a heavy volume of commuter traffic to and from South Hill, including to Ithaca College via South Aurora Street / NYS Route 96B. The Site is in close proximity to residential neighborhoods, which will be impacted by increased traffic volume. The Site's proximity to the downtown core and Ithaca College makes it well situated for alternative modes of transportation (e.g., walking, biking, carpooling, and mass transit).
- A review of both AM and PM peak hour capacity analysis results for the pre-developed condition indicate that the overall levels of service (LOS) operate at "D" or better at the signalized intersections, which is an acceptable capacity level. The signalized intersections are the major roads leading to and around the Site.
  - The overall vehicle traffic in this area will be higher subsequent to completing the Project.
  - Availability of queue spacing has been identified as a potential impact.
- The eastbound and westbound approaches at the intersection of Clinton Street/Aurora Street/Prospect Street operate at LOS "F" during both peak hours for the pre-developed condition.



- Generally, all other approaches to the study area intersections operate at “D” or better, with only four intersections operating with approaches of “E.”
- The Phase I trip generation estimates are 228 vehicles per hour (vph) for the AM peak hour and 182 vph during the PM peak hour. The Full Development trip generation estimates are 945 vph for the AM peak hour and 925 vph for the PM peak hour, as shown in FGEIS Table 5.7-5, provided below:

PHASE	LAND USES	SIZE	AM PEAK		PM PEAK	
			ENTER	EXIT	ENTER	EXIT
Phase I	Office	82.55 ksf	114	15	21	102
	Residential	80 Units	8	25	26	15
	Industrial	170.6 ksf	94	12	10	66
	Sub-total		216	52	57	183
	<i>Trip Reductions</i>		-30	-10	-18	-40
	<b>Total New Trips</b>		<b>186</b>	<b>42</b>	<b>39</b>	<b>143</b>
Phase II, Full Build-out	Office	185.6 ksf	254	37	48	229
	Residential	835 Units	84	240	259	159
	Retail	52.2 ksf	47	13	88	105
	Restaurant	7.2 ksf	0	0	36	18
	Industrial	246.5 ksf	158	23	20	139
	Sub-total		543	313	451	650
	<i>Trip Reductions</i>		-76	-63	-178	-180
	<b>Total New Trips</b>		<b>467</b>	<b>250</b>	<b>273</b>	<b>470</b>
<b>Full Development</b>	<b>Total New Trips Under Full Development</b>		<b>653</b>	<b>292</b>	<b>312</b>	<b>613</b>

- The cumulative effect of Project-generated traffic on the transportation network is dependent on the origins and destinations of that traffic and the location of the access drives serving the Site.
  - Based on the network’s traffic volumes, it is estimated that 62 percent of the total trip generation will originate from west, north, and east of the Site.
  - An estimated 8 percent will travel from NYS Route 96 and Elmira Road.
  - The remaining 30 percent will originate from areas south of the Site.
- The capacity analysis results shown in FGEIS Table 5.7-8 indicate most of the approaches and overall LOSs at the study intersections will operate within acceptable parameters between existing, background, and full development conditions.
  - Additional traffic from the proposed Project may increase the potential for collisions.
  - Proposed Driveway I/Aurora Street
    - Under Phase I full development conditions, the eastbound approach is projected to operate at LOS “E” and “D” during the AM and PM peak hours, respectively.
    - Between Phase I and Phase II, the LOS is projected to decrease to LOS “F” during both peak hours.
    - Driving patterns may change to reflect the typical operating conditions along NYS Route 96B at the Site’s driveways and may utilize other points of ingress/ egress.
  - Proposed Driveway II/Aurora Street
    - This intersection is projected to operate as an enter-only driveway.
    - Little to no delay is projected at this proposed intersection.
  - Aurora Street (NYS Route 96B)/Proposed Driveway III

- Between Phase I and Phase II full development conditions, the eastbound LOS decreases from “C” and “B” during the AM and PM peak hours, respectively, to “F” during both peak hours.
  - Coddington Road/Danby Road/Driveway IV
    - Under Phase I full development conditions, the eastbound left/thru approach is projected to operate at LOS “D” during both peak hours. Between Phase I and Phase II full development conditions, the LOS decreases to “F” during both peak hours. The anticipated delay and corresponding LOS for the eastbound movement is characteristic of un-signalized side roads on heavily trafficked arterials such as NYS Route 96B. Between both phases of full development, the westbound approach from Coddington Road decreases in LOS from “C” to “E” during the AM peak hour and from “C” to “D” during the PM peak hour.
  - Proposed Driveway V/Danby Road (NYS Route 96B)
    - This intersection will be constructed during Phase II of full development conditions. A LOS of “C” is projected for eastbound exiting traffic during the AM and PM peak hours. All other approaches operate at LOS “A.”
  - Clinton Street (NYS Route 96B)/Aurora Street/Prospect Street
    - The eastbound left and westbound approaches operate at LOS “F” between all conditions during both peak hours. Between Phase I and Phase II full development conditions during the AM peak hour, the eastbound right approach decreases from LOS “C” to “E”.
  - State Street/Aurora Street
    - The westbound left approach operates at LOS “C” during the AM peak hour and “F” during the PM peak hour under Phase I development conditions. The AM peak hour LOS for the approach decreases to “F” under Phase II full development conditions. The northbound approach decreases from “B” and “C” to “C” and “D” during the AM and PM peak hours, respectively, between Phase I and Phase II full development conditions.
  - Clinton Street/Cayuga Street
    - Between Phase I and Phase II full development conditions during the AM peak hour, the overall LOS decreases from “D” to “E”. The southbound left approaches decreases from “E” to “F” during both peak hours between Phase I and Phase II full development conditions.
  - Pine Tree Road/NYS Route 79
    - The southbound approach during the PM peak hour between Phase I background conditions and Phase I full development conditions decreases from LOS “E” to “F”. Between Phase I and Phase II full development conditions, delay increases by 55.1 seconds.
  - Access via Turner Place and Cayuga Street
    - The alternative capacity analysis performed shows that delays are projected to increase for all approaches during both peak hours at the Aurora Street/Clinton Street/Prospect Street intersection.
- The Project Sponsor’s traffic consultant provided the following table which depicts the results of queuing analysis at the proposed Site access driveways during Phase I and Full Development Conditions:

<b>AM Peak Hour Queuing Results</b>				
<b>Site Access Driveway</b>	<b>Phase I Queue Length (in feet)</b>	<b>Full Development Queue Length (in feet)</b>	<b>Full Development with Mitigation Queue Length (in feet)</b>	<b>Conceptual Available Storage to First</b>

	<b>Average</b>	<b>95<sup>th</sup> Percentile</b>	<b>Average</b>	<b>95<sup>th</sup> Percentile</b>	<b>Average</b>	<b>95<sup>th</sup> Percentile</b>	<b>Intersection (in feet)</b>
Driveway I	20	49	46	78	52	91	160
Driveway II	NA	NA	NA	NA	NA	NA	N/A
Driveway III	7	26	36	60	19	39	211

- Based on the above queuing analysis there are sufficient storage lengths at Driveways IV and V during both peak hours. Driveway III during the PM peak hour is borderline based on 95th percentile queues. However, queues of this length are expected to be infrequent and are intended to illustrate a worst-case scenario. On the other hand, Driveway I during the PM peak hour shows queues that are longer than the conceptual available storage.
- The Project Sponsor's traffic consultant provided the following sight distance evaluation:

<b>Drive</b>	<b>North</b>	<b>South</b>
Drive I	> 500 ft.	400 ft.
Drive II (proposed to be only an entrance)	400 ft.	> 500 ft.
Drive III	> 500 ft.	> 500 ft.
Drive IV	> 500 ft.	> 500 ft.
Drive V	> 500 ft.	> 500 ft.

<b>AASHTO Intersection Sight Distance</b>	
<b>Speed</b>	<b>Distance</b>
40 mph	445 ft.
45 mph	500 ft.

- Based upon the above data, there is sufficient sight distance at all the proposed access points except for Drive I, south and Drive II, north.

**Mitigation**

- Mitigation will include all direct access points to the Project including existing and proposed drives on NYS Route 96B as well as extensions of Turner Place and South Cayuga Street into the Project.
  - The mitigation will include access drive improvements. Such improvements may include signalization, signal coordination, turn lanes, and geometric improvements.
  - Off-Site mitigation will consist of signalization optimization and other traffic control measures.
  - Additional mitigation will take the form of vehicle sharing and improvements to pedestrian/bicycle facilities.

**Phase I Specific Mitigation**

- Relative to Phase I, NYSDOT has specified certain mitigation requirements relative to Route 96B. Specifically, NYSDOT will require the following Phase I mitigation:
  - Changing the four-lane section of NY 96B south from the city/town line to past Bella Vista Dr. by reconfiguring the two southbound lanes to one through lane and incorporating left turn lanes for both directions at intersections, and hatching where appropriate.

- Sidewalk will be required along the frontage of the Site on the western side of Route 96B, from the city/town line to the Coddington Rd. intersection.
- The proposed driveway, immediately south of city/town line, will be a one-way ingress only; no traffic will be allowed to exit onto Route 96B at this location.
- In addition, the Project Sponsor shall introduce and implement Transportation Demand Management (TDM) strategies to reduce Single Occupancy Vehicle (SOV) trips to and from the Site. The following potential TDM strategies will be considered for Phase I implementation:
  - Market-priced parking
  - Preferential parking for ridesharing services
  - Bicycle parking facilities
  - Subsidized transit passes
  - Connections to transit stops (i.e. construct sidewalks to existing stop at Hillview Place)
  - Dedicated shuttle service
  - Transportation Alternatives Information
  - Coordination with Smart Trips Ithaca
  - Connected and improved pedestrian network within the Phase I limits (i.e., improvements to sidewalks within Sidewalk Improvement District No. 4)
  - Pedestrian oriented design within the Phase I limits
  - Bicycle network facilities within the Phase I limits and provide easement to nearby Gateway Trail
  - Follow Crime Prevention Through Environmental Design (CPTED) principles in all design
  - Coordination with Ithaca College and South Hill Business Park

#### Post-Phase I Mitigation

- A post-Phase I Traffic Study will be performed as part of the Phase II site plan application.
- The Lead Agency understands that Washington State's Commute Trip Reduction (CTR) program and CTR Efficiency Act, a law passed by the State Legislature, requires local governments in urban areas with traffic congestion to develop programs that reduce SOV trips and Vehicle Miles Travelled (VMT) per capita. The Project Sponsor has committed to adapt and scale this program to the projected employment centers proposed within the CWD.
- Addition TDM or CTR initiatives will be implemented as follows:
  - Transit Coordination – Continued coordination with TCAT on transit routes and marketing the nearby routes of 65 and 11. TCAT bus line will boost ridership through increased awareness coupled with improved service.
  - Route Expansion – Working with TCAT to provide new/expanded bus service through the Site provides an opportunity for greater mode choice resulting in trip and parking reductions.
  - Bus Stop Amenities – A clean, well-lit, informative bus stop with shelters and seating greatly improves the image of the transit serving an area. Bus stop amenities make taking the bus a comfortable experience, while proper maintenance tells people that transit makes up an important part of the neighborhood.
  - Employer Carpooling – Carpooling will be encouraged by providing incentives and other services such as ride-matching.
  - Emergency Ride Home – In case of a personal emergency during the day, transportation is provided at no cost to one's vehicle, residence, or other place such as childcare, doctor's office, etc.
  - Preferential carpool/vanpool parking – Investigate the use of vRide for employers located on the Site.
  - Transportation Alternatives Information – Bus schedules, walking and bicycling maps, neighborhood and on-Site wayfinding will be made readily available.
  - Telecommuting and compressed work schedules – Employers will be encouraged to offer flexible work options. Employee vehicle trips are reduced by the percentage of

employees that telecommute or have a “free” day gained through a compressed schedule, on an average day.

- Location and Quantity of Bicycle Parking Spaces – The Project will include convenient bicycle parking locations in clear sight of access points into buildings, safe and secure longer term storage within parking areas, and a sufficient number of bicycle parking spaces that encourages a greater number and demographic of residents, employees, and visitors to utilize bicycling as a means of transportation.
- The Price of Parking – Parking spaces that are typically included in building and rental costs will be reviewed, and “unbundled” parking, paid as a separate item, will be considered.
- Financial Incentive Programs – Developing Commuter Financial Incentive Programs, such as Parking Cash Out, offer employees the choice of receiving a subsidized parking space an equivalent financial incentive.
- Bike Share – A micro bike share system that is developed for the Site or a more robust system that is developed for the City and Town (i.e. Lime Bike) encourage more transit ridership and provide additional public transportation options. A bike share system can offer mobility, economic, health, safety, and quality of life benefits.
- Car Share – Coordination with Ithaca Carshare will be pursued during Phase I as demand potentially grows through increased residential and commercial based occupancy rates.
- Relationship with Ithaca College – The Site is located less than a half-mile from Ithaca College. An integrated and coordinated approach to the development of the Site and potential for interaction between the two entities should be explored.
- Electric Vehicle charging station – The County will be conducting a study to identify needs and opportunities. This could be included in the Project as an amenity to residents, and it supports the County’s goals to reduce greenhouse gas emissions.
- In order to mitigate post Phase I traffic impacts to the maximum extent practicable, following completion of Phase I, the Project Sponsor will implement an on-going Monitoring and Mitigation Implementation Plan (MMI Plan).
- The MMI Plan will include an update of traffic conditions based on full occupancy of Phase I of the development utilizing field collected data and before the next phase of development begins to verify underlying assumptions and evaluate the effectiveness of TDM strategies.
- All traffic study updates will be reviewed by NYSDOT and a City Traffic Engineer.
- This post-Phase I occupancy traffic update will evaluate the following intersections: (i) Aurora Street/Prospect Street/Clinton Street, (ii) Aurora Street/State Street, (iii) State Street/Seneca Way, (iv) State Street/Green Street, (v) Clinton Street/Cayuga Street, (vi) Cayuga Street/Seneca Street, and (vii) Cayuga Street/Spencer Street.
  - This post-Phase I occupancy traffic update will also include an evaluation of whether a traffic signal is warranted at all site access driveways.
- The MMI Plan will also provide for additional traffic study updates at the following stages of development:
  - Immediately following tenant occupancy of Phase I of the Project;
  - When proposed post Phase I development within the CWD results in more than 75 vehicle trips per hour (cumulative over Phase I); and
  - Each time a proposed post-Phase I development within the CWD will result in more than 150 vehicle trips per hour
  - In addition, per NYSDOT, a traffic study update will be required for each phase of the project where modifications and/or additional mitigation is proposed in the NYSDOT R.O.W
- Traffic study updates will verify trip distribution models and confirm when traffic mitigation measures identified in the GEIS should be implemented. Other than the update immediately following tenant occupancy of Phase I of the Project, all updates will be submitted and reviewed,

per the thresholds established herein, in conjunction with proposed site plans for each phase of development. The intersections to be analyzed in each traffic update include:

- Site Accesses 1 and 2
- Site Accesses 3, 4 and 5 (NYSDOT owned)
- Aurora Street/Prospect Street/Clinton Street
- Prospect Street/Turner Place
- Columbia Street/Aurora Street
- Aurora Street/State Street
- State Street/Seneca Way (NYSDOT owned)
- State Street/Green Street (NYSDOT owned)
- Clinton Street/Cayuga Street
- Cayuga Street/Seneca Street (NYSDOT owned)
- Cayuga Street/Spencer Street
- Pine Tree Road/SR 79 (NYSDOT owned)
- State Street/Stewart Avenue
- Turner Place corridor between site access and Prospect Street
- Cayuga Street corridor between site access and West Spencer Street
- Additional mitigation measures at specific intersections (dependent upon and subject to future traffic study updates) are described as follows:
  - Prospect Street/S Aurora Street – Impacts to Aurora Street/ Clinton Street/Prospect Street and potential mitigation does not include physical improvements to the intersection, as ROW and existing buildings limit the ability to expand the intersection. Additionally, a traffic signal is not an appropriate treatment. Therefore, higher capacity people mover systems (i.e., new TCAT routes and improved headway, and potential automated transit service between the Commons and the Site) are needed.
  - S Aurora Street/Columbia Street – Traffic signal warrants are not met at this intersection to alleviate delays for Columbia Street traffic. All traffic can be accommodated, as needed, at the existing traffic signal at Aurora Street/Hillview Place. The reduction of SOV trips and increased mode share of pedestrian, bicycle, and transit trips will reduce total site generated traffic passing through this intersection.
  - S Aurora Street/Site Access 3 – Delays at Driveway III are projected to decrease from LOS “F” to LOS “E” with the installation of traffic signals at Driveway I and IV.
  - Cayuga Street/Clinton Street – The Project Sponsor’s traffic consultant developed signal timing adjustments for the PM peak hour and the associated capacity analysis results which are presented at Appendix F of the FGEIS. These adjustments reduce the projected LOS “E” for the northbound thru/right approach and LOS “F” for the southbound left approach to LOS “D” for both approaches. The Project Sponsor has had discussions with ITCTC about an automated fixed route system along Cayuga Street that would shuttle people between the Commons and the Site. The Lead Agency recommends that a feasibility study of such a system be performed by ITCTC with participation from the Project Sponsor.
  - The capacity analysis indicates most of the approaches and overall LOSs at the study intersections will operate within acceptable parameters between existing, background, and full development conditions. Project driveway specific results and mitigation are as follows:
    - Driveway I: Under Phase I development conditions, the eastbound approach is projected to operate at LOS “E” and “D” during the AM and PM peak hours, respectively.
      - Between Phase I and Full Development, the LOS is projected to decrease to LOS “F” during both peak hours.
      - This intersection should be monitored after redevelopment of the Phase I buildings for delay and operation for drivers entering and exiting the Site to determine what point in the future a traffic signal is installed.

- Internal roadways interior to the Driveway I access will be designed to mitigate potential spillback into internal intersections.
- The Project Sponsor's proposed mitigation for Driveway I includes installing advanced intersection warning signage (Manual of Uniform Traffic Control Devices (MUTCD) W2-2L) for northbound approaching vehicles.
- Driveway II: This intersection is projected to operate as an enter-only driveway. Therefore, little to no delay is projected at this proposed intersection. No mitigation is warranted or recommended.
- Driveway III: Between Phase I and Full Development conditions, the eastbound LOS decreases from "C" and "B" during the AM and PM peak hours, respectively, to "F" during both peak hours.
- Driveway IV: Under Phase I development conditions, the eastbound left/thru approach is projected to operate at LOS "D" during both peak hours. Between Phase I and Full Development conditions, the LOS decreases to "F" during both peak hours.
- Driveway V: This intersection will be constructed during Full Development after Phase I. A LOS of "C" is projected for eastbound exiting traffic during the AM and PM peak hours. All other approaches operate at LOS "A".
- During Full Development conditions, all of the proposed driveways along NYS Route 96B potentially warrant a left-turn lane during the AM peak hour. The warrants during the PM peak hour are met for the proposed Driveway II, proposed Driveway III immediately south of Grandview Avenue, and the proposed Driveway V. Left-turn lanes are recommended at the proposed Driveways III, IV, and V under Full Development if conditions warrant the same.
  - Under Full Development conditions, the guidelines for a full width right-turn lane are satisfied at the proposed Driveway I under AM conditions only. The remaining driveways are not met.
  - Based on the expected delays under Full Development conditions and a traffic signal warrant analysis, a three-colored traffic signal is recommended for the intersection of Coddington Road/Danby Road/Driveway IV. The traffic signal should be designed to provide a permitted/protected northbound and southbound left-turn phase. Left-turn lanes are recommended at Proposed Driveways III, IV, and V.
- Aurora Street/State Street (MLK Jr. Street): In order to improve the existing and future peak hour operating conditions at this critical intersection, an alternative that provides two westbound approach lanes on State Street was investigated.
  - By restriping the westbound approach to include separate left and right-turn lanes (the right-turn lane should be restriped to include 100 feet of storage), the overall delay decreases during the AM peak hour by 17 seconds per vehicle.
  - Similarly, during the PM peak hour there is a decrease in delay by over 13 seconds per vehicle. In order to provide the two approach lanes on State Street, peak hour ONLY parking restrictions are recommended for the two metered parking spaces on the approach to the intersection.
  - During off-peak hours of operation, drivers can continue to use the approach as a single-lane approach with the ability to continue using the two metered parking spaces on the north side of State Street.

### Summary

- Mitigation measures have been developed upon completion of Phase I and Full Development (Phase II):

PHASE	LOCATION	MITIGATION MEASURE
I	All signalized City intersections	System-wide signal timing update to ensure optimized signal operation.
	Aurora Street/Clinton Street/ Prospect Street	The use of TDM strategies should be utilized to reduce vehicle trips generated as a result of the Project.
	Seneca Street/Cayuga Street	System-wide update of signal timings as mentioned above.
	Clinton Street/Cayuga Street	TDM strategies.
	Pine Tree Road/Slaterville Road	The intersection should be monitored for delay as it relates to potential future signalization.
	Proposed Driveway I/Aurora Street	Consider installation of a three-color traffic signal after redevelopment of the existing buildings, prior to new development in Sub Areas CW3 and CW4. A study of intersection delay at this point will confirm the need for a potential signal. This signal should be coordinated with the traffic signal at Hillview Place.
II	Aurora Street/State Street	Restripe the westbound approach to provide separate left and right-turn vehicle movements during peak hours only. Enforce peak hour ONLY parking restrictions on north side of State St. approach.
	NYS Route 96B/Coddington Road/Proposed Driveway IV	Realign, restripe the intersection to include opposing northbound/southbound left-turn lanes, and install a three-color traffic signal. The Project Sponsor should work with NYSDOT and the property owners affected by any intersection realignment.
	Proposed Driveways III and V at NYS Route 96B	Install northbound left-turn lanes at Proposed Driveways III and V.
	Cayuga Street/Seneca Street	System-wide update of signal timings.
	Cayuga Street/Clinton Street	System-wide update of signal timings.
	Downtown Ithaca	Update a downtown circulation plan with the purpose of developing a workable multimodal circulation system supportive of all modes of travel in the Ithaca CBD. The plan should be flexible to accommodate evolving modes of transportation.

- The Project will incorporate pedestrian, bicycle, and transit friendly accessibility and mobility design characteristics where possible.
  - Crossing treatments should be installed at all intersections and use high-visibility treatments. Mid-block crossing locations may be installed, where feasible, and not be located further than 400 feet from the nearest crossing location. In lieu of dedicated bicycle lanes where street widths are too narrow for one to be installed (bicycle lanes are required to be at least 5 feet in width adjacent curbs), shared lane markings – “sharrows” – should be used to indicate bicycle friendly streets.
  - Bicycle signage along the roadways can be used to increase driver’s awareness of bicyclists as well as encourage bicycle ridership.
  - An on-Site multi-use trail system should be considered to provide off-street circulation routes for pedestrians and bicyclists. This trail system should be connected to the Gateway Trail along the western ridge of the Site.



- The internal pedestrian network should connect to the existing sidewalk network along NYS Route 96B and allow connections to Ithaca College and Downtown through or along the edge of the Site. As of April 2015, a Pedestrian Corridor Study is underway to determine the appropriate locations for a sidewalk/off-road multi-use path system and crossing locations between the City/Town line and King Road. Internal sidewalks should be installed in the anticipation a complete sidewalk network is developed along NYS Route 96B to encourage non-motorized travel.
- Parking and parking lot Design Guidelines have been developed as further mitigation. While it is important to provide parking as a component of the Project, a number of measures have been incorporated into the plan to minimize the need for parking by increasing trail, pedestrian and bicycle connections to strongly encourage walking and bicycling.
- The proposed Gateway Trail will be developed via easements between the Project Sponsor and the City and Town to connect to the South Hill Recreation Way to the existing Black Diamond Trail.
- Pedestrian sidewalks will be constructed in safe and convenient locations, connecting users of the Project to the existing pedestrian network in adjacent neighborhoods.
- Bicycle facilities will be present throughout the Site via on-street pavement markings and signage directing riders to destinations on and off-Site.
- Mass transit access will be provided in locations that are agreed upon through coordination between the Project Sponsor and TCAT as the Site is developed. The Conceptual Site Layout Plan depicts two on-Site bus stops.

## 8. Utilities

The GEIS evaluated the potential impacts to the utility infrastructure with additional emphasis on public water supply, sanitary sewer and stormwater systems. The Site is currently served by public utilities that have sufficient capacity to provide for additional demand and without the need of expanding public district or service areas. The Site is supplied with potable water by the City. The water is connected to the public water system on Turner Place and at a dead-end line on South Aurora Street near Parking Lot 4. The City Department of Public Works (DPW) indicates there is adequate capacity and pressure in the water supply system. The on-Site private portion of the water system consists of approximately 3,960 lineal feet of 12-inch water main. Approximately 2,340 lineal feet is located outside of the buildings and 1,620 lineal feet is located inside the buildings. The watermain is a mixture of an older cast iron pipe and a newer ductile iron pipe. All upgrades and repairs to the water system were completed using ductile iron pipe. There are 15 fire hydrants connected to the private watermain that protect the existing structures. The system performs with a static pressure of 90 to 130 psi with the ability to provide up to 1,700 gpm for fire flow.

### **Potential Impacts**

- The total estimated water usage for the redeveloped core of the District is approximately 110,000 GPD and 161,500 GPD for the new buildings. This is an average demand of 188 gpm. Using a peaking factor of 8.0, there is a peak demand of 1,500 gpm.
  - Overall, the main impact to the water system is the increased usage estimated for the Project.
- The existing sanitary sewer system connects to the City sanitary sewer system at two locations. There is a 12-inch sewer located on Turner Place, adjacent to building 21, and a 10-inch sewer located on South Cayuga Street. The total flow capacity for these two mains is 2,033 gpm and 1,450 gpm, respectively. The wastewater generation rates will mirror the estimates for the public water usage. The estimated wastewater generation is 271,500 GPD. This is an average demand of 188 gallons per minute. Utilizing an 8.0 peaking factor, it is estimated that the peak flows are approximately 1,500 gpm.
  - The main impact to the sanitary sewer system is the increased usage estimated for the Project

- The Site is currently served with stormwater drainage facilities consisting of catch basins, stormwater sewers, and grassed swales.
  - The Site does not have any stormwater control facilities, such as retention basins or underground infiltration systems. The Site does not have good infiltration characteristics, as it contains many rock outcroppings and generally the depth to bedrock is minimal.
  - There is also very little existing green space to develop traditional drainage basins.
- The existing 6" natural gas line serving the Site is rated at medium pressure which is currently operating at approximately 20 psi. It is assumed that total energy consumption is 98,000 BTU/sf for commercial space and 94,000 BTU/sf for residential space for the purposes of estimating annual baseline usage. Natural gas usage is estimated at 32% of the total usage. Therefore the natural gas usage annual base line is 45,900 MMBTUs.
- The Site is served by the NYSEG South Hill electric substation located on South Cayuga Street. The Coddington-South Hill 34.5 kV Line #526 traverses the Site from the South Hill substation easterly to Coddington Road.
  - The Site is also served by a private electric substation that is powered by Line #526. This substation was sized to serve the entire Site at its peak operational needs. Based on conversations with NYSEG Staff, depending on final electric usage as well as on-site generation (i.e. photovoltaic), additional upgrades to the existing substation equipment may be necessary.
- The Project will require high-speed data to provide services expected in a new community such as the CWD. The 915 dwelling unit and approximately 400,000+ gross square footage of space dedicated to business uses will put a demand on these utilities.
- Lighting from the Project, once fully developed, will be greater than under current conditions and will increase light levels in the outdoor environment. Without proper planning and design, light trespass (the spillage of light into a neighboring property) can occur. Light going up into the sky, or sky glow, can reduce visibility of the stars.

### **Mitigation**

- Water/Sanitary Sewer
  - The City may be able to restore the old cast iron pipe likely to have heavy tuberculation that historically fed the three water storage tanks on Site to have better flowrates.
    - However, the City recommends adding a new public water connection point further down South Aurora Street near the main entrance drive to loop the system when the new buildings are constructed in the CW3 Sub Area.
    - If the tuberculation cannot be mitigated, then a replacement watermain will be installed.
  - Loop existing City water system through Sub Area CW3 from the current connection at NYS Route 96B/Driveway III intersection to a new point of connection at the NYS Route 96B/ Driveway I intersection.
  - Construct any new public water and sewer mains to have a minimum diameter of 8-inches and be looped (if practicable). All work shall be in accordance with (Ten State) Recommended Standards for Water Facilities and Water Works.
  - Use NYS required water saving plumbing fixtures. The Project will follow LEED ND guidelines for new buildings and buildings undergoing major renovations by reducing indoor water usage 20% from a baseline, demonstrable through product cutsheets and fixture schedules.
  - Meter and audit individual buildings.
  - Investigate the on-Site storage and reuse of stormwater by repurposing the on-Site underground water storage tanks near Driveway III or creating a new storage area in Sub Area CW2 to reduce on-Site water demand.
- Stormwater Infrastructure
  - At a minimum, the on-Site storm sewer collection system will be designed for the 10-year design storm.

- A full SWPPP and coverage under NYSDEC General Construction SPDES permit will be required. The stormwater mitigation features for the redeveloped portions of the site will be designed in accordance with NYSDEC's guidelines for redeveloped projects. The new construction areas will fall under NYSDEC regulations for traditional development.
- A majority of stormwater controls will be green infrastructure suitable for the urban setting. The "Water Quality Volume" and "Runoff Reduction Volume" will be treated using a combination of green roofs, stormwater planters, and hydrodynamic separators.
- Develop an Operations and Maintenance (O&M) Plan to insure the proper use of the stormwater conveyance system.
- Electric/Natural Gas Energy Use
  - Alternative energy measures are being investigated for the Site including PV, wind, and CHP or cogeneration systems.
  - New buildings will meet LEED criteria and include efficient design and renewable energy systems necessary to achieve at least a 70% reduction in fossil fuel use in compliance with the Architecture 2030 Challenge. That would reduce energy usage by up to 53,000 MMBTUs per year and return the usage estimates to pre-developed estimates for typical industrial use of the existing Site based on the 821,200 sf GSA.
- A full photometric plan will be submitted with each site plan application and will incorporate "Dark Sky" techniques to confine and minimize light to the extent practicable while maintaining proper safety.

## 9. Air Quality

The GEIS focused specifically on the potential impacts to area wide/regional air quality and air quality on the Site. The Project Sponsor evaluated whether the Project would result in violations of ambient air quality standards or health-related guidance values related to vehicle emissions, building emissions and historical impacts. The area wide/regional air quality analysis included an evaluation of National Ambient Air Quality Standards (NAAQS) for six common pollutants and an assessment of Greenhouse Gas Emissions from on-Site emissions. The six common pollutants analyzed were carbon monoxide, lead, nitrogen oxides, ozone, particulates and sulfur dioxide. On site air quality was analyzed by studying numerous investigations of indoor and outdoor on site air quality for over a decade. The GEIS also evaluated whether the Project would result in violations of ambient air quality standards or health related guidance values for vehicle emissions, building emissions and historical impacts.

### Potential Impacts

- There will be some air quality impacts during construction due to vehicle emissions for a limited timeframe.
- In addition to the vehicle emissions, Greenhouse Gases (GHG) from Building emissions have also been evaluated.
  - GHG emissions resulting from the use of natural gas (45,901 mmBTU annually) to serve the buildings for the Project are projected to total 2,686 Tons of Carbon Dioxide equivalent (CO<sub>2</sub>e).
  - The GHG components include Carbon Dioxide (CO<sub>2</sub> - 2,685 MT/yr), Methane (CH<sub>4</sub> - 0.048 MT/yr) and Nitrous Oxide (N<sub>2</sub>O - 0.00025 MT/yr).
  - Based on the criteria identified in the NYSDEC FEAR Workbook and the assessment of the GHG emissions due to the Project, there are impacts to air quality from the Project due to carbon dioxide emissions.
- In addition to GHG from building emissions related to energy consumption, tenants with certain types of commercial or industrial operations may emit pollutants into the air. The degree and type of air pollutants emitted depends on the tenant's specific operations.
- Since the Project includes occupation of many existing buildings not routinely occupied, adverse impacts have the potential to arise from the occupation of Buildings 1, 2, 3, 4, 5, 6, and 6A (any remaining portions), 8, 10, 13A, 13B, 15, 24, 33 (remaining portions), 34 and 35.

- The potential for SVI into existing buildings to be occupied and new buildings would need to be addressed by mitigation, monitoring, or further analysis.
- The analyses performed reveal no significant impacts to air quality with the exception of potential exceedance of threshold criteria for carbon dioxide from building emissions and soil vapor intrusion from historical impacts potentially effecting indoor air quality.

### **Mitigation**

- Vehicle Emissions: No mitigation measures are proposed beyond those set forth under traffic mitigation measures.
- Building Emissions: Will be mitigated via the following:
  - Investigate alternative energy measures to reduce building emissions of carbon dioxide
  - New buildings will meet LEED ND criteria and include efficient design and renewable energy systems necessary to achieve at least a 70% reduction in fossil fuel use in compliance with the Architecture 2030 Challenge. That would reduce total energy usage by up to 53,000 MMBTUs per year (note, only a portion of this would be for on-Site building emissions).
  - Any commercial or industrial tenant operations with the potential to emit air pollutants must identify and control those sources through the NYS Air Pollution Control Program (6 NYCRR Part 201) and any other applicable laws and regulations.
- Historic Impacts: The prior testing for soil vapor intrusion will be utilized by the Project Sponsor in coordination with NYSDEC and NYSDOH to determine which structures warrant mitigation or monitoring. Existing buildings likely to require mitigation, monitoring or additional analysis include:
  - Mitigation of Buildings 1, 2 (basement portion), 3, 4, 5, 6 and 6A (remaining portions), 8, 10, 18, 21, 24, 33 (remaining portions) and 34
  - Monitoring of Buildings 13A and 17
  - Buildings 2 (upper portion), 10A, 13B, 15 and 35 may require some additional action to identify sources and reduce exposure.
- Prior to any new building construction in the CW3 or CW4 Sub Areas, the VOCs data for soil and groundwater within the proposed building footprint will be analyzed for the potential for soil vapor intrusion and mitigation will be included as part of the construction as warranted.
- Mitigation measures set forth for Public Health and Environment and Traffic shall also serve to mitigate impacts to air quality.

## **10. Visual and Aesthetic Resources**

Visual and aesthetic resources are characterized by various elements that form a viewer's perception and aesthetic response to a place, object, or setting. The GEIS reviewed critical vantage and viewpoints where the visual environment is considered an important aspect of the Site from within the City and Town. Many of these views are listed in the Town Scenic Resource Inventory & Analysis and the Tompkins County Scenic Resources Inventor. These views included Danby Road, Taughannock Boulevard, Cliff Street, Hector Street, West Haven Park, Sheffield Road, Upper Botswick Road, East Shore Park, and Tutelo Park. Specific points in the City include Meadow Street, Route 13 heading south mid-way down the hill, Stewart Park, Allan H. Treman State Marine Park, Cass Park, South Cayuga Street heading south, and Cornell University on East Hill.

A field analysis included a before/after comparison using photography to collect near and distant views. Eighteen (18) existing views were documented in late February during leaf off conditions in order to capture the maximum visual impact. Massing models have also been created to illustrate the potential visual and aesthetic impacts of proposed development in the context of existing Site conditions. The visual impact analysis includes the following:

- Photographs of existing views of the Site during leaf off conditions, as identified in the Scoping Document.

- Photographic perspectives, visual renderings, and visual simulations of the Project from each critical receptor point, providing a before/after comparison.
- Maps of each viewshed illustrating the sight lines and views internal and external to the Site.
- View descriptions from critical vantage points of the proposed development using photographs.
- Architectural elevation drawings of the Phase I buildings were developed.

### **Potential Impacts**

- The existing Site buildings are, and some proposed new buildings will be, visible from a number of locations throughout the City and Town in varying degrees.
- The visual and aesthetic character of Route 96B, as illustrated in viewsheds 9 and 10, will incur the greatest impacts, as the Project will create a new and vibrant street front.
- More distant views and views of limited visibility of the Project, such as viewsheds 1, 2, 3, 4, 5, 6, 7, 11, 12, 13 and 14 will have far less impacts, as the proposed new structures relate to and blend with the existing structures from a distance.

### **Mitigation**

- Mitigation measures include strategies such as architectural approaches and themes consistent with the surrounding neighborhood, visual screening and planting/landscaping and, carefully locating components within the Project. The Conceptual Site Layout Plan serves as mitigation.
- The Conceptual Site Layout Plan mitigates visual impact through the careful placement of proposed structures in a manner that forms a relationship between the topography and the structures across the landscape.
- The Design Guidelines require development to be of similar character with the existing structures. For example, the application of architecture strategies such as fenestration of the proposed structures that continue the rhythm and character of the existing structures allows for new structures to blend with the Site as it exists. The Design Guidelines include detailed limits on the heights of proposed building (different limits for each Sub Area), building setbacks, maximum façade length, and public frontages.
- Sub Area CW1 is designated as a Natural Area, which includes the steep slopes on the western side of the Site and will include the Gateway Trail. This Sub Area is highly visible from many viewpoints and will be preserved. The existing vegetation in this area provides some screening of the existing upslope buildings. Designating Sub Area CW1 as a Natural Area mitigates potential impacts from proposed buildings.
- The Project Sponsor will be following LEED ND guidelines including compact development, tree-lined and shaded streetscapes, and minimized site disturbance.

## **11. Community Services**

The GEIS analyzed the potential impacts to community services including Government Facilities, Solid Waste Management, Educational Facilities, Cultural Facilities, Religious Facilities, Health Care Services, and Public Safety. The Site, located in both the City and Town, is relevant to both municipalities' offices. The City of Ithaca City Hall is located at 108 East Green Street and the Town of Ithaca Town Hall is located at 215 North Tioga Street, each respectively 0.5 miles and 0.6 miles north from the Site. The United States Postal Service Downtown Ithaca Office is located at 213 North Tioga Street, approximately 0.6 miles north of the Site. Additionally, a number of approved postal provider satellite sites are located within a 1.5-mile radius from the Site.

## **Potential Impacts**

- **Government Facilities:** The Project will result in a notable increase of the tax base, as described under Cumulative Impacts, thereby increasing the revenue for the City, Town and County Governments.
- **Solid Waste Management:** The Project will result in an increase of solid waste. In addition to the solid waste generated by residences on-Site, there will be an increase in commercial and/or manufacturing waste, depending on tenants. Consultation with the TCRSWC revealed that it is currently operating at 21% of its capacity for waste and 41% for recyclables.
- **Educational Facilities:** The Site is located within the Ithaca City School District (ICSD) boundary. The Project estimates there will be approximately 50 children living on-Site creating a new demand on the ICSD. Based on correspondences with ICSD, schools in the ICSD have the capacity to accommodate future residents of the CWD. Higher learning educational facilities in close proximity to the Site include Cornell University (located approximately 1.0 mile northeast of the Site) and Ithaca College (located approximately 0.5 miles to the southeast).
- **Cultural Facilities:** The Site is positioned near a variety of existing cultural facilities. The Tompkins County Public Library is located at 101 East Green Street, approximately 0.5 miles from the Site. Cinemapolis, a 5-screen cinema house, is located at 120 East Green Street, approximately 0.5 miles from the Site. The State Theatre of Ithaca, a historic 1,600 seat theatre that hosts bands, dramatic performances, and films, is located at 107 West State Street, 0.6 miles from the Site. CSMA also offers public dances, musical events, and art shows.
  - The Project will result in a greater demand on existing cultural facilities. It is expected that some employees commuting to the CWD would use existing cultural facilities during their non-work hours. The Project will also provide a significant amount of community space resulting from the selective demolition of portions of existing buildings. This increased internal open space will provide opportunities for markets, collective gatherings, festivals, and other larger community events.
- **Religious Facilities:** The City is the home to many religious institutions including over a dozen within a 1 mile radius. The Project will result in a greater demand on the existing religious facilities. Additionally, it is expected that some employees commuting to the CWD would use existing religious facilities during their non-work hours. It is expected that this would result in a negligible or otherwise positive impact through increased attendance, participation, and donations.
- **Health Care Services:** The City and Town have a number of facilities which provide health and medical care. Cayuga Medical Center is the largest medical facility in the area, with a 204-bed acute care hospital serving inpatient and outpatient needs and an Emergency Department that is open 24-hours per day.
  - The Project will result in a greater demand on the existing health care services due to increased demand largely as a result of the increased residential population, but also to a lesser extent, the workforce employed at the CWD. The Project's residential population is expected to be approximately 1,830, and the employee population to range between approximately 800-1,000 people.
- **Public Safety Services:** The Project Site is served by a City police station, fire station, County sheriff's office, NYS police and Bangs Ambulance service. The Project will construct approximately 1,830 bedrooms, or approximately 915 units.
  - This will impact the existing public safety services, requiring resources and staff time from the police (City of Ithaca Police Department, the Tompkins County Sheriff's Office and at times the New York State Police), fire (the City of Ithaca Fire Department and as needed adjacent and nearby community fire stations and departments) and emergency medical services.

## **Mitigation**

- Analyses of the community services indicate that there will be adequate capacity for community services despite increased demands resulting from the Project. Any increased demands from

the Project on such services will be mitigated by the additional tax base generated by the increased property assessment for the Site. The assessed value of the Site will increase from \$3.5M to an estimated \$236M.

- Additional mitigation includes sales tax and other taxes on revenue generated by the operations of the Project as well as individual business operations located on-site. These additional taxes have not been considered in this analysis but would nevertheless further mitigate the cost of providing community services to the Project.
- Although the Site lies in both the City and Town, there would be no jurisdictional confusion as police protection operates on a “close-car” concept, and fire protection and emergency medical services operate without regard to the City and Town distinctions.

## **12. Open Space and Recreation**

The GEIS analyzed the potential impacts to open space and recreation as a result of the Project and its alternatives within and adjacent to the Site, including parks, trails and other recreational resources. The City, Town, and Tompkins County own many open spaces within a developed urban environment and provide residents and visitors with a wide variety of recreational resources, including hiking, biking, boating, fishing, and educational resources. There is a large quantity of trail networks within and connecting to these parks and recreational resources. Buttermilk and Robert H. Treman State Parks have their own internal hiking trails and are connected by the Finger Lakes Trail System. The Finger Lakes Trail system is over 950 miles in length and runs from the Pennsylvania-New York border in Allegany State Park to the Long Path in the Catskill Forest.

### **Potential Impacts**

- The existing impervious area on the Site is 35.75+/- acres. The Project will reduce the overall potential open space on the Site by approximately 11% or 11.2 acres with an increase of development and impervious surfaces in the future.
- The Project will impact open space and recreation by allowing the construction of the proposed Gateway Trail. The Gateway Trail will provide a missing link between South Hill Recreation Way, Buttermilk Falls State Park, the Finger Lakes Trail, and the Black Diamond Trail, creating broader connections between the City, Town, and Tompkins County.
- The construction of the Gateway Trail will impact current residents and visitors to the City, Town, and Tompkins County as a whole, as well as the future residents and employees at the CWD.
- The construction of the Gateway Trail will provide another pedestrian route to, from, and through the Site. This will result in the Site becoming an important link and node in connecting an extensive hiking and recreational trail network that allows for non-motorized activities such as snowshoeing and cross-country skiing in the winter. This action promotes transportation efficiency through multimodal transportation and impacts public health by facilitating physical activity.

### **Mitigation**

- To ensure the long term benefits on open space, Sub Area CW1 Natural Conservation Area is proposed to limit development and uses to only recreationally-base programming.
- In addition to the Gateway Trail, with the development of the Project, the Site will become a bridge between South Hill and Downtown Ithaca. A pedestrian network will traverse the Site, connecting NYS Route 96B to S. Cayuga Street, allowing for greater accessibility to Downtown amenities and services, and vice versa. A pedestrian network is also being established internally within the Site with sidewalks along many streets and pedestrian-dominated courtyards.
- Open spaces, courtyards, and a pedestrian network of sidewalks and trails will provide passive and active recreational opportunities throughout the CWD.

- The City of Ithaca and its consultants published a draft Parks and Recreation Master Plan in November 2017. The Plan, among other things, highlights the future connection of the Gateway Trail/Buttermilk Falls Corridor as one of the key planned trail system enhancements. A permanent easement will be established along the western portion of the Site to assist with such trail enhancements.

### 13. Construction Activities

The GEIS analyzed the potential impacts from Project construction activities and measures to mitigate them. The Site has been utilized as a construction staging area for multiple off-Site projects in the area including the City sponsored Commons infrastructure redevelopment project.

#### **Potential Impacts**

- The Project calls for the full development of the Site over a seven to ten year period in multiple phases. Planning and coordination will be required for the construction of the various phases. The NYSDEC ROD amendment and market conditions will influence phasing and timing of the redevelopment plan.
- Because the Project will have multiple phases over many years, there are both short and long term potential impacts. Many of these impacts are typical of any construction project, and include work related to: (1) site work; (2) foundations; (3) steel work; (4) concrete flatwork; (5) exterior wall construction; (6) roofing; (7) interior finish work; and (8) exterior site improvements.
- Construction work for the Project in the CW3 and CW4 Sub Areas may encounter impacted media and building materials such as concrete floor slabs. As such, these activities have the potential to impact on-Site workers, neighboring properties, or the environment if not properly handled.
- Additional construction impacts typical for a project of this nature include:
  - Construction Staging: Due to the multiple phases, a construction staging area may potentially impact the residents/occupants of the Site as well as the adjacent property owners.
  - Soil Erosion/Dust: Development of the Site will include clearing and grading of land which creates the potential for soil erosion due to land disturbance and stormwater runoff. Particulate matter and dust generation is also a potential impact due to demolition and grading.
  - Solid Waste: Construction and demolition on the Site will generate related solid waste. Those materials not reused or recycled will require disposal.
  - Noise/Emissions: Noise, air emissions and vibration will be generated from construction activities, worker traffic, heavy equipment operation and delivery vehicles.
  - Construction Traffic: Traffic volumes will increase from the movement of construction workers and off-Site construction equipment.
  - Asbestos: Projects that involve demolition typically encounter asbestos containing materials (ACM).
  - Worker Safety: Projects of this type have potential impacts to workers including health and safety concerns typically associated with construction activities.

#### **Mitigation**

- NYSDEC ROD Amendment: A SMP (which includes an Excavation Work Plan and Groundwater Management Plan) and various other Remedial Work Plans specific to the area being addressed will be developed and implemented for all areas of the Site that remain on the IHWDS Registry, i.e., all areas generally located north of the creek that runs west to east across the Site.
- All work at the Site involving the disturbance of impacted soils or groundwater in the IHWDS areas will also be implemented under CAMPs and Health and Safety Plans in order to ensure that impacts to on-Site workers and the surrounding community are mitigated.



- This includes continuous monitoring during periods of impacted soil or groundwater disturbance by an environmental professional.
- Construction activity will be coordinated with NYSDEC-approved remediation to eliminate or minimize disturbance of impacted media and building materials.
- Construction Staging: The majority of the construction will be staged in former Parking Lot #6 (which is the parking area east and uphill of Building 34). This staging area is centrally located and will allow ease of access to the Site and also provides a large paved area to reduce temporary construction impacts. The area utilized for staging will be fenced and gated to control access.
  - Lot #6 will be used as a staging area and will minimize traffic interruptions by providing two separate construction access points on NYS Route 96B that can easily be operated and maintained with typical flagging in accordance with NYSDOT requirements or with the addition of temporary traffic signalization. This central staging area will also maintain the pedestrian, bicycle and vehicle access and parking for the CWD population throughout the multiple development phases.
  - Limits of disturbance during construction will be clearly delineated to reduce encroachment into sensitive or prohibited areas and the areas of disturbance will be limited to the extent practicable.
  - The Site Plan drawings for Phase I include a detailed construction staging plan.
  - Project identification and wayfinding signage to distinguish construction and public access points will be used. Signage shall also be provided to indicate contacts for complaints and/or questions regarding the Project. Signage shall be maintained throughout the construction phase.
- Soil Erosion/Dust: A generic SWPPP has been prepared for the full development of the Site. A Full SWPPP is developed for the Phase I Site Plans in accordance with the NYS SWMDM and the NYS Erosion and Sediment Control Manual. Mitigation will include coverage under a SPDES General Construction Permit (GP-0-15-002), installation of proper erosion and sediment (E&S) control measures in accordance with the approved SWPPP, and weekly inspections by a Qualified Professional.
- Dust creation is also mitigated by implementing the SWPPP. Specific mitigation will include wetting of roadways and hydroseeding/mulching immediately upon grading to minimize dust and promote vegetative cover. Potential fugitive dust emissions from material storage piles will be controlled through the use of enclosures, seeding, covers or spraying with a dust suppressant as necessary.
- The generation of airborne demolition-related dust will be reduced through standard construction practices including application of dust suppressants over the involved area to minimize blowing and circulation of exposed soils/materials.
- The need for blasting will be minimized as much as possible. If blasting is deemed necessary, any permits and authorizations will be clearly identified and obtained as part of the Site Plan approval process prior to commencing. Blasting specifications would be developed in accordance with NYSDOT procedures for blasting. Any blasting will be minimized when developing grading plans.
- Solid Waste: Prior to demolition, the Project Sponsor will consult with Finger Lakes ReUse to determine eligibility for their “deconstruction” program that identifies suitable buildings for deconstruction, safely dismantles them by hand to harvest maximum materials, and then sells the materials through their existing ReUse Center at discounted prices. All other metal construction debris will be separated and recycled. Any remaining debris will be disposed of at a permitted construction and demolition (C&D) landfill.
- Construction disposal plan for non-recyclable construction waste handling and removal in accordance with local regulations and following LEED guidelines will be developed. Phase-specific disposal plans will be developed during the Site Plan Approval process.
- All remaining demolition debris will be disposed of at C&D landfills or recycling facilities permitted by NYSDEC (per 6 NYCRR 360 Solid Waste Management Facilities). NYSDEC

requires demolished materials containing lead paints to be disposed of at permitted C & D facilities.

- Noise/Emissions: Proper maintenance of all construction equipment and appropriate muffler systems on all equipment will be required. Construction vehicles will be shut down whenever practicable and the idling of such vehicles will not be permitted.
- The Project will be governed by the respective City and Town guidelines for construction schedules and local noise ordinances. Hours of operation for exterior construction will be limited to the hours of 7:00 am to 6:00 pm Monday through Saturday, or as per the City/Town Ordinances for noise. Interior construction will be limited to Monday through Saturday from 7:00 am to 11:00 pm.
- Construction Traffic: A safe construction/delivery routing plan will be developed. This includes the development of a Maintenance and Protection of Traffic Plan for all work zone areas. Parking for construction-related personnel will be located on-Site.
- Asbestos/Hazardous Materials: An asbestos survey in accordance with 12 NYCRR 56 Section 5 will be completed for all structures scheduled for renovation or demolition prior to such activity to determine the presence, if any, of asbestos-containing building materials. This survey will be performed by a licensed asbestos inspector certified in compliance with 12 NYCRR 56 Section 3.2.
- Worker Safety: All work will be completed in accordance with OSHA requirements including developing an accident prevention program that provides for frequent and regular inspection of the jobsites, materials, and equipment by competent persons designated by the employers in accordance with 29 CFR 1926.20(b).

#### **14. Irreversible and Irretrievable Commitments of Resources**

As part of the impact analysis SEQR requires that the GEIS identify the irreversible and irretrievable commitment of resources, if any. The GEIS identified several irreversible and irretrievable commitments of resources required for construction and operation of the Build Alternatives, which would include construction materials, energy (construction and operation phases), labor, capital, and land. The Project Sponsor will undertake practical efforts to minimize impacts through the implementation of a project-specific Sustainability Program, using LEED ND as the framework for the development and operation of the Project.

Public and private financial commitment is likely to provide residents and municipalities in the immediate area, region, and State with increased property and sales tax revenue, growth in land values surrounding the Site, other revenues directly or indirectly generated by the new development, and other intangible quality of life benefits to the City and Town such as the provision of improved access to downtown and the 95 acre parcel itself. Therefore, the financial investment in the Project represents long-term beneficial effects, rather than irreversible or irretrievable commitments of resources.

#### **15. Unavoidable Adverse Impacts**

SEQR also requires an analysis of unavoidable adverse impacts. The GEIS found that the Build Alternatives are generally consistent with local and regional plans and policies for redeveloping the Site and would result in significant short- and long-term benefits. However, some unavoidable adverse impacts would result from implementation of the Build Alternatives. The unavoidable adverse impacts are similar for each Build Alternative but may vary in degree of impact.

Construction-phase impacts would include localized and temporary impacts to soil erosion, solid waste generation, sound levels, air quality, and traffic. Short-term noise impacts associated with construction-related vehicles would be regulated by local and State regulations and standards. Soil erosion would be mitigated through the NYSDEC SPDES process and the development of project specific SWPPPs. Air quality impacts would be limited to short-term increases in fugitive dust and mobile source emissions

from construction equipment. Construction traffic will be minimized with the development of on-site staging areas.

Overall, the Build Alternatives would have significant, positive long-term impacts. However, as with any sizable urban development, there may be minor long-term impacts. These impacts include increased vehicular traffic, noise and air quality resulting from denser development patterns. Some existing viewsheds will be altered due to the placement of new structures on the site. In addition, there would be impacts to public utilities due to increased usage including natural gas, electric, fiber optics, public water, and sanitary/storm sewers.

## **16. Growth Inducing Aspects**

Under SEQR the GEIS must also analyze potential growth-inducing aspects of the Project. The GEIS identified the following growth-inducing aspects: The Project would provide significant investment and potential growth in the City and the Town through the revitalization of a vacant industrial site. Through the revitalization and transformation of a large, underutilized Site with identified environmental challenges, the CWD will function as a lively, mixed-use, sustainable community and regional destination.

In particular, the Project would include the construction of a substantial mixed-use neighborhood including residential, commercial, office, and industrial/maker-space opportunities. This, in turn, would expand the City's employment base as well as add much needed new housing. The Project addresses two of the underlying causes of gentrification: low housing supply and a shortage of developable land in the City for new housing. Rezoning the CWD to allow the development of new housing will reduce pressure on existing neighborhoods to accommodate Ithaca's job growth and demand for housing in walkable neighborhoods.

## **17. Effects on the Use and Conservation of Energy Resources**

The construction and operation of the Build Alternatives would have both short-term and long-term impacts on the use and conservation of energy resources. In the short-term, construction of all Build Alternatives would require the use of nonrenewable energy resources including: gasoline, diesel fuel, and electricity. In addition to construction-related energy use by equipment, the indirect use of energy would also occur as a result of construction workers commuting to and from the construction site.

The long-term impacts of each Build Alternative on energy resources would differ in magnitude for each of the Build Alternatives with the Low-Density Alternative having the least impact and the High-Long-term impacts on the use and conservation of energy will result from the consumption of energy from day-to-day Project operations, such as heating, cooling, powering various commercial and industrial operations and lighting buildings, and from Project generated traffic. Long-term impacts on the use and conservation of energy will result from the consumption of energy from day-to-day Project operations, such as heating, cooling, powering various commercial and industrial operations and lighting buildings, and from Project generated traffic.

New buildings will meet LEED ND criteria and include efficient design and renewable energy systems necessary to achieve at least a 70% reduction in fossil fuel use in compliance with the Architecture 2030 Challenge. That would reduce total energy usage by up to 53,000 MMBTUs per year and return the usage estimates to pre-developed estimates for typical industrial use of the existing Site based on the 821,200 sf gross square area (GSA) .

Finally, the Project's adaptive reuse of existing buildings allows for the preservation of the energy embodied in existing buildings. By preserving the existing buildings where feasible, the Project will avoid the disposal of thousands of BTUs worth of building materials. Building reuse extends the life

cycle of buildings and conserves resources such as energy by requiring less manufacturing and transportation of materials.

## THRESHOLDS:

Pursuant to SEQR, Agencies may prepare a GEIS when there is a need to assess a wide variety of impacts at a more conceptual level on a larger geographic area, often including cumulative impacts, rather than project-specific or site-specific EISs. As Project plans move forward, Project changes may occur as the conceptual development plan is developed into final design proposals for the well-defined elements, but more likely, for the less defined components. Such changes may specifically include proposed changes to the contemplated development program.

The Project was evaluated utilizing a GEIS to analyze Site-specific impacts associated with various aspects of the Preferred Alternative as well as more long-term and/or cumulative impacts associated with future phases of Project development. Final designs for less-defined Project components as well as any proposed changes to the more well-defined elements (hereinafter referred to as "Future Project Plans.") would require further evaluation pursuant to SEQR. The City of Ithaca Planning and Development Board, as Lead Agency, would be responsible for performing an environmental review on Future Project Plans and must consider Future Project Plans proposed in relation to the GEIS and the Findings Statement. Upon development of Future Project Plans, the Project Sponsor would work with the Lead Agency to determine if the environmental impacts associated with such Future Project Plans have been adequately addressed in the GEIS and SEQR Findings Statement, taking into account whether the proposal exceeds any of the thresholds outlined below. Such a determination must be made before any Future Project Plans are approved. A Checklist for Future Project Plans Consistency with GEIS has been developed and is attached hereto as **Attachment C**.

In the event that the Lead Agency determines that:

- I. Future Project Plans would be carried out in conformance with the conditions and thresholds established in below, then no further SEQR compliance would be required;
- II. Future Project Plans would be carried out in conformance with the conditions and thresholds established below, but are not addressed or are not adequately addressed in this Statement of Findings, then an amended findings statement must be prepared;
- III. Future Project Plans are not addressed or are not adequately addressed in the GEIS for the Project, but the proposal does not exceed any of the thresholds established below, or the proposal does exceed a threshold(s) established in below, but would not result in any significant adverse environmental impacts, then a negative declaration must be prepared; or
- IV. Future Project Plans are not addressed or are not adequately addressed in the GEIS for the Project and/or the proposal would exceed one of the thresholds established below and may have one or more significant adverse environmental impacts, then a supplement to the GEIS must be prepared.

Future Project Plans that exceed any one of the following conditions or thresholds shall not be considered to have been addressed by the GEIS/Findings Statement and must be evaluated by the Lead Agency to determine whether additional environmental review (e.g., a Supplemental Generic Environmental Impact Statement) would be necessary:

Environmental Setting	Threshold/Condition
Land Use	Material changes to when site plan approvals are triggered; allowable uses in Sub Areas; size and location of Sub Areas (see Figure 2.1-3 and Table 2.7-1); required buffers; maximum Sub Area coverage; and maximum density.

	<p>A material change to the Conceptual Site Layout Plan such as the general location or grouping of structures and streets or Site access points.</p> <p>Total square footage of uses (residential, commercial and industrial) as set forth in Table 2.7-1.</p>
Land – Topography	Development proposed on slopes greater than or equal to 20%.
Water Resources – Stormwater	Future proposed action likely to exceed total impervious site coverage rate of 70%.
Vegetation	<p>Non-recreational facilities proposed in CW1.</p> <p>Material change to size (23.86 acres) and location of CW1.</p>
Public Health and Environment	The NYSDEC Issued ROD Amendment to allow for the mixed-use of the Site does not call for a remedial action different from those analyzed in the GEIS.
Transportation	Future proposed action likely to exceed a mixed-use development of 1.7 MSF or square footage allocations for land uses set forth in Table 5.7-4.
<p>Utilities</p> <p>Water</p> <p>Discharge to Turner Place Sewer</p> <p>Discharge to South Cayuga Street Sewer</p> <p>Total peak sewer discharge</p> <p>Natural Gas / Electric</p> <p>Light</p>	<p>Proposed action likely to cause the Project's total demand to exceed:</p> <p>271,500 GPD and peak @ 1500 gpm</p> <p>2,033 gpm</p> <p>1,450 gpm</p> <p>1,500 gpm</p> <p>143,400 MMBTUs</p> <p>Not to exceed Design Guidelines, Table 13</p>
Air Quality	Proposed action likely to cause Project's total emission of carbon dioxide equivalent to exceed 2,686 tons/year.
Visual and Aesthetic Resources	<p>Proposed maximum building height exceeds Design Guidelines, Table 7.</p> <p>Material change to size (23.86 acres) and location of CW1.</p>
Open Space	<p>Non-recreational facilities proposed in CW1.</p> <p>Material change to size (23.86 acres) and location of CW1.</p>

**CERTIFICATION OF FINDINGS:**

Having considered the DGEIS and the FGEIS, including the comments received on the DGEIS and the FGEIS, and having considered the preceding written facts and conclusions relied upon to meet the requirements of 6 NYCRR 617.9, the Lead Agency finds and certifies that:

- I. The requirements of Article 8 of the New York State Conservation Law and the implementing regulations of NYSDEC, 6 NYCRR Part 617, and local regulations, have been met; and
- II. Consistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigative measures that were identified as practicable.

The City's designees are hereby directed to file and distribute this Findings Statement as required by 6 NYCRR Part 617 pertaining to Article 8 of the Environmental Conservation Law (SEQR).

These Findings were adopted by majority vote of the City of Ithaca Planning and Development Board at a duly called meeting held on March 27, 2019.

**City of Ithaca Planning and Development Board**  
**108 East Green Street**  
**Ithaca, New York 14850**

Signature of Responsible Officer: *James Cornish*

Date: *3/26/19*

Name/Title of Responsible Officer: *PLANNING DIRECTOR*

