



MEMORANDUM

TO: Town of Blooming Grove Planning Board

FROM: Bonnie Franson, AICP CEP, PP
Brennan Duarte, Planning Analyst

RE: Chester SF LLC Craigville Road Warehouse DEIS Completeness Review
County Road 51 (Craigville Road), Town of Blooming Grove; SBL 52-5-11.2 and 54-1-50.1)

DATE: March 1, 2024

CC: Members, Blooming Grove Town Board
Christina Gleeson, Planning Board Secretary
Pat Brady, PE, Planning Board Engineer
Steve Honan, Esq., Planning Board Attorney
Steven Esposito, RLA, for the Applicant

The purpose of this memorandum is to determine whether the resubmitted sections of the draft environmental impact statement (DEIS) are complete. The Planning Board agreed, subsequent to the last determination that the DEIS remained incomplete, that the Applicant could work with the consultants to send sections of the DEIS on a rolling basis, in order to review the document prior to the entire document being resubmitted for completeness review. In this manner, the comments could be whittled down until they were addressed to the satisfaction of the Planning Board and Town consultants.

On behalf of the Applicant, Engineering & Surveying Properties (EP) has been transmitting redlined sections of the DEIS for NPV review. Simpler sections (e.g., Table of Contents) were submitted starting January 24, 2024, and the last set of DEIS sections were received on February 20, 2024. There was a follow-up comment from EP regarding the Alternatives section on 2/20/24, but a response has not been further received. This memorandum addresses all redlined revisions made up to 2/20/24.

We remind everyone of the timeframes - the time period for review of a revised draft environmental impact statement is thirty-days which is extended to the meeting in the month two months following the corresponding regular monthly meeting at which the draft EIS is received, as per Town of Blooming Grove Code.

The review timeframe will commence once the Applicant submits a full revised DEIS to the Planning Board.

Based on our review of the draft sections, we have only a few remaining comments. We will continue to review edits with the Applicant unless the Applicant wants to address them in a full submission to the Planning Board. Note that we do not believe we received an updated Ecological Appendix, and the Alternative section revisions have not been received.

Note that some of our comments have been eliminated, but we will raise them as substantive comments when the DEIS is deemed complete.

These comments are in addition to any that the Planning Board and other consultants may have on completeness. We did speak with the Planning Board Engineer who indicated he did not have comments at this time related to DEIS completeness.

A. DEIS Comments

Cover Sheet, Table of Contents and General Information

Comment #	Page #	Comment
1.	iii and iv	The pagination for the tables and figures does not match the document pages. We expect this will change with the changes in the text, but make sure it is accurate before resubmission.
2.	vi	Appendix 3: Water Quality Laboratory Analytical, is not listed in the TOC. It should be between Appendices F and G. Please address in the DEIS print document.

Chapter I: Executive Summary

Comment #	Page #	Comment
1.	3	Parking is not consistent, stating 88 loading bays etc. Please keep consistent with site plan and rest of the document.

Chapter II. Project Description

Comment #	Page #	Comment
1.	12	Changes related to “state of the art” warehouse facility – make sure to update reference on page 4.
2.	13	Comments regarding the list of involved and interested agencies from the introduction are also applicable to this section. Not addressed to match prior section.
3.	12	Provide total square footage of the parking area. Not addressed.

Chapter III. Existing Conditions, Environmental Impacts and Mitigation Measures

III.1 Land Use, Zoning and Public Policy

Comment #	Page #	Comment
1.	18	The “Provided Parking” includes 60 loading berths; on the same page, it states there are 89 loading berths. The Provided Parking should indicate there are 60 trailer parking spaces, to total 409 spaces.
2.	20	The DEIS does not go through the requirements for the various overlay zoning districts....this is addressed, but review formatting for DEIS print.
3.	23	Under Consistency with Overlay Districts, the first sentence needs to be revised. The DEIS states that site is setback over 1,000 feet from the Scenic Viewshed Overlay, but the warehouse will be located partially on lands in the overlay. Need to clarify what part of the site lies in the Scenic Viewshed Overlay – refer to site plan if shown there. Is it undeveloped

Comment #	Page #	Comment
		land or will a portion of the warehouse/other developments be located there? Describe to complete discussion.
4.	24	While the DEIS describes the variances, it does not analyze the <u>impact</u> of the variances. For example, what is the impact on the residential area by not having the drive setback 100 feet as required? Repeat comment.
5.	23	There is no quantitative data showing that the site avoids steep slopes. It appears that the warehouse is being constructed on steep slopes, as the flat areas of the site are wetlands. Specifically, of the total amount of steep slopes on the site, how much, in acres and percent, is being disturbed? Repeat comment. If calculated elsewhere refer to that section.

III.2. Geology, Soils, and Topography

Comment #	Page #	Comment
1.	General	In “POTENTIAL IMPACTS” sections, the following needs to be discussed: <ul style="list-style-type: none"> Grading plans will be described with respect to changes in <u>drainage patterns...</u> this comment has been addressed but must remove the phrase “<i>you can copy and paste any additional text from this as needed</i>” at the end of the paragraph.
2.	30	In Table III.2.2, the erodibility ratings of “slight” do not appear to be accurate. Check the K values. No change or clarification has been made.
3.	32	As mentioned previously, it does not appear that the DEIS quantifies the amount in acres and percent of steep slopes that are actually being disturbed. Please provide. No discussion on steep slope disturbance could be found. Repeat comment.

III.3. Wetlands and Surface Water Resources

Comment #	Page #	Comment
1.	33	Clarify that MO-3 wetlands area is also subject to the ACOE jurisdiction – still not in the text as requested.

III.4 Vegetation and Wildlife

Comment #	Page #	Comment
1.	Table III.4.1	Habitat cover types in table do not match the habitat assessment in Appendix D. States that Appendix D has been updated. Still need to review the updated appendix.
2.	App. D	Prior comment was Bog turtle conservation zone is illegible. The map has not been updated, but removed – please include. According to the text, Appendix D has been updated. Still need to see the updated appendix.

III.5. Stormwater Management

Comment #	Page #	Comment
1.	50	Section III.5.1, “EXISTING CONDITIONS” - The following items are to be addressed as per Scope (repeat comments):

Comment #	Page #	Comment
		<ul style="list-style-type: none"> Water quality criteria compliance will be provided as required by the New York State Department of Environmental Conservation current Stormwater Management Design Manual. Not included. Peak runoff rates both on and off-site shall be discussed. Not included.

III.6. Groundwater Resources

Comment #	Page #	Comment
1.	60	Please review III.6.3 and add or correct punctuation – it is unclear in places what is being stated. Reword the first sentence, potentially break down into multiple. Last sentence of second bullet point can be simplified.

III.7 Visual Resources and Community Character

Comment #	Page #	Comment
1.	General Comments	<ul style="list-style-type: none"> Environmental impacts associated with the character of the surrounding area within the Town of Blooming Grove, including Scenic Gateways Overlay and Scenic Road Overlay. The same sentence regarding improvements is used for both Overlay districts. Please just confirm that these improvements are in fact the same in each. Address the consistency/inconsistency with the surrounding area. Please provide specifics.
2.	49	A table should be provided listing every vantage point, and from which locations the site could or could not be viewed, in the main text of the DEIS. Still not provided – while we can overlook this for completeness, we would hope, for the benefit of the Planning Board's review, this would be added.
3.	51	There is no discussion of light levels in this section but the DEIS includes the following as a mitigation measures...this section needs to discuss lighting impacts. Repeat comment.

III.8. Traffic and Transportation

Comment #	Page #	Comment
		No comment.

III.9. Infrastructure and Utilities

Comment #	Page #	Comment
		No Comment.

III.10. Noise

Comment #	Page #	Comment
1.		No comment.

III.11. Air Quality

Comment #	Page #	Comment
		No comment.

III.12. Community Facilities

Comment #	Page #	Comment
1.	97	Please provide reference for the following: “... the CFD has determined that it has an adequate number of staff, vehicles, and equipment to provide protective services for the project”. This comment is addressed – please make sure to add correspondence to Appendix Q.

III.13 Fiscal Impacts

Comment #	Page #	Comment
1.		No comments.

III.14 Cultural Resources

Comment #	Page #	Comment
1.	111	We note on 2/27/24, the Applicant’s Engineer submitted a map showing the cultural resource site within an expanded wetland buffer area and conservation area. No further completeness comments.

III.15 Public Health

Comment #	Page #	Comment
		No comment.

III.16 Sustainability

Comment #	Page #	Comment
		No comment.

Chapter IV. Construction Sequencing and Phasing

Comment #	Page #	Comment
		No comment.

Chapter V. Alternatives

Comment #	Page #	Comment
1.	91	Separate access drive – this is not the configuration that has been discussed previously. The second drive would be located farther south and would follow the existing farm road. This second drive would connect to the employee parking area. Please show this alternative, and discuss the potential wetland impacts. Not addressed – this was described in an email to Engineering Properties on February 22, 2024.

Chapter VI. Growth Inducing Aspects

Comment #	Page #	Comment
1.		No comment.

Chapter VII. Unavoidable Adverse Impacts

Comment #	Page #	Comment
		No comment.

Chapter VIII. Project Impacts on Energy Use and Solid Waste Management

Comment #	Page #	Comment
		No comment.

Chapter IX. Irreversible and Irretrievable Commitment of Resources

Comment #	Page #	Comment
		No comment.