

Denise Harrington-Cohen
Assistant Superintendent for Business

October 26, 2022

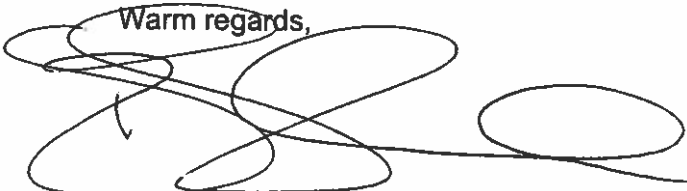
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To Whom It May Concern:

As a follow-up to the Notice of Intent to be lead agency, which was sent to you in September, please find enclosed the Croton-Harmon UFSD Board of Education adopted resolution, the signed Part 3 Form and the Part 3 Narrative.

Should you have any questions, please feel free to reach out to me at 914-271-4793 x4211, denise.cohen@chufsd.org.

Warm regards,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Denise Harrington-Cohen
Assistant Superintendent for Business

Agenda Item Details

Meeting	Oct 20, 2022 - Work Session
Category	2. New Business/Work Session
Subject	2.1 SEQRA Resolution Issuing a Negative Declaration
Access	Public
Type	Action
Recommended Action	That the Board of Education approves the resolution confirming SEQRA lead agency and issuing Negative Declaration of Significance as presented.

Public Content

Confirming SEQRA Lead Agency and Issuing Negative Declaration of Significance CHUFSD District-Wide Capital Improvements

WHEREAS, the Board of Education of the Croton-Harmon Union Free School District (the "Board") is considering a capital project to repair, renovate and upgrade buildings and infrastructure situated upon property of the Croton-Harmon Union Free School District ("CHUFSD"); and

WHEREAS, the capital project under consideration entails construction, land disturbance and related activities upon the grounds of Croton-Harmon High School, Pierre Van Cortlandt Middle School, the Carrie E. Tompkins Elementary School campus (including CHUFSD administrative offices and maintenance facilities) and the CHUFSD transportation facility (collectively, the "Proposed Project"); and

WHEREAS, on September 1, 2022, the Board duly adopted a Resolution declaring its intention to serve as SEQRA Lead Agency for purposes of the Proposed Project and authorizing the CHUFSD Clerk to circulate a copy of the September 1, 2022 Resolution and a Notice of Intention to Serve as Lead Agency, together with completed Full Environmental Assessment Form, Part 1 to all involved and interested agencies; and

WHEREAS, the CHUFSD Clerk circulated copies of these materials to all identified involved and interested agencies on September 2, 2022; and

WHEREAS, thirty (30) days have elapsed since the circulation of the Board of Education's Notice of Intention to Serve as Lead Agency and no agency has voiced objection to the Board of Education's assumption of SEQRA Lead Agency status; and

WHEREAS, the Board of Education is in receipt of a completed Full Environmental Assessment Form, Parts 1, 2 and 3 prepared by KG+D Architects, architectural and planning consultants to CHUFSD (the "FEAF"); and

WHEREAS, the proposed work to be undertaken at Pierre Van Cortlandt Middle School includes building and site renovations described in the project description in the FEAF, which includes but is not limited to roof and masonry repairs/replacements, HVAC upgrade, a +/-500 square foot building addition, courtyard renovation, ballfield expansion and playground resurfacing; and

WHEREAS, the proposed work to be undertaken at Croton Harmon High School includes building and site renovations described in the project description in the FEAF, which includes but is not limited to roof and masonry repairs/replacements, HVAC upgrade, a +/-3000 square foot building addition, auditorium renovation, cafeteria renovation, security upgrades, field irrigation improvements and running track improvements; and

WHEREAS, the proposed work to be undertaken at the Carrie E. Tompkins Elementary School campus includes building and site renovations described in the project description in the FEAF, which includes but is not limited to roof and masonry repairs, HVAC upgrade, toilet room renovations, courtyard renovation, building additions of +/-4750 square feet, parking lot modifications, roof replacement at CHUFSD administrative offices, additional parking area at the CHUFSD administrative offices, and athletic field

Full Environmental Assessment Form
Part 3 - Evaluation of the Magnitude and Importance of Project Impacts
and
Determination of Significance

Part 3 provides the reasons in support of the determination of significance. The lead agency must complete Part 3 for every question in Part 2 where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.

Based on the analysis in Part 3, the lead agency must decide whether to require an environmental impact statement to further assess the proposed action or whether available information is sufficient for the lead agency to conclude that the proposed action will not have a significant adverse environmental impact. By completing the certification on the next page, the lead agency can complete its determination of significance.

Reasons Supporting This Determination:

To complete this section:

- Identify the impact based on the Part 2 responses and describe its magnitude. Magnitude considers factors such as severity, size or extent of an impact.
- Assess the importance of the impact. Importance relates to the geographic scope, duration, probability of the impact occurring, number of people affected by the impact and any additional environmental consequences if the impact were to occur.
- The assessment should take into consideration any design element or project changes.
- Repeat this process for each Part 2 question where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.
- Provide the reason(s) why the impact may, or will not, result in a significant adverse environmental impact
- For Conditional Negative Declarations identify the specific condition(s) imposed that will modify the proposed action so that no significant adverse environmental impacts will result.
- Attach additional sheets, as needed.

See attached.

Determination of Significance - Type 1 and Unlisted Actions

SEQR Status: ☒ Type 1 ☐ Unlisted

Identify portions of EAF completed for this Project: ☒ Part 1 ☒ Part 2 ☒ Part 3

determined. However, it would be located within 100 feet of the natural watercourse on-site and therefore will require review and approval of a SWPPP by the NYCDEP.

Proposed activity may occur within close proximity to the onsite stream channel which will need to be protected from direct disturbance and from sedimentation by eroded soils during the construction period. Additionally, permanent stormwater management practices that are appropriate for accommodating the quality and quantity of any net increase in stormwater runoff from the developed site will be required to minimize the potential impact to water resources. Stormwater management systems must be designed in accordance with the requirements of the New York State *Stormwater Management Design Manual*⁸ for compliance and coverage under the current NYSDEC SPDES General Permit.⁹

No significant impact on surface water resources is expected with strict adherence to an approved stormwater plan. Appropriate design and implementation of the stormwater management plan will minimize potential adverse impacts on land and water resources.

The proposed development is not anticipated to have any significant adverse impact on potable water demand or sanitary wastewater generation at the servicing municipal facilities.

There will be no anticipated impact to groundwater nor will the project cause any change in flooding potential at or downgradient from the site (EAF Part 2, #4 Impact on Groundwater and #5 Impact on Flooding).

IMPACT ON ECOLOGICAL RESOURCES [EAF Part 2, #7 & 8]

Existing Conditions

All three sites are located in an area that has potential for bald eagle habitat. There are no other threatened or endangered species (plant or animal species) known to occur or their presence mapped in the project area. There is no significant natural habitat mapped or known to exist on or near the project sites, nor is there other regionally or locally important habitat known to exist on these properties.

None of the project sites include land within or adjacent to a designated Critical Environmental Area (CEA) and thus the project will have no impact to a CEA.

Avoidance or Minimization of Potential Impacts

The project work areas at the three sites are located within or close to existing development which previously disturbed the pre-existing natural conditions. Therefore, no direct impact to significant ecological resources is anticipated to result from this project. However, investigation of the on-site conditions for the absence of bald eagle nests in or near the work area must be documented prior to construction to avoid potential impact to the species.

⁸ NYSDEC. New York State Stormwater Management Design Manual. 2015. www.dec.ny.gov/chemical/29072.html

⁹ Current SPDES General Permit for Stormwater Discharges from Construction Activity is GP-0-20-001.

Transportation Department Site

The files of OPRHP indicate there are no identified historic properties on or near the Transportation Department site, nor is the property located near any known prehistoric site. A cultural resources survey was conducted for a portion of the Transportation property west of the existing parking lot and no such resources were found.¹³ This study does not cover the area of the proposed project work and therefore further survey of the project area for the possible presence of cultural resources will likely be necessary before construction.

There are no designated scenic or aesthetic resources known to exist within the viewsheds of the subject sites of the proposed project from which a visual impact could result from the proposed action.

The subject facilities have been in existence for three or more decades with an established presence in the community. This institutional use clearly "fits" in the community, providing significant social benefits to the local neighborhood while requiring very limited services in return from the community.

Avoidance or Minimization of Potential Impacts

Study of the site areas reveals that none of these properties is located such that the proposed activities on District properties will cause an adverse impact visually on a historic property nor will any have a direct line of sight to the new work proposed. The cultural resources study undertaken in 2022 at the Elementary School site concluded that the NRE and NRL properties in the vicinity will not be impacted by the proposed project.

The Elementary School and Middle School / High School sites occur within an area identified as potentially archaeologically sensitive due to resources being found at one or more nearby sites (within one-half mile of the subject property). The cultural resources study undertaken in 2022 at the Elementary School site concluded that no further investigation of archaeological resources is warranted for this project (subject to concurrence by OPRHP).

Since the proposed action will result in ground disturbance, further review of potential archaeological resources at the Middle School / High School site through consultation with OPRHP will be needed and, if appropriate, measures to avoid potential impacts to archaeological resources will be incorporated into the project plans. With such measures incorporated into the project design there would be no significant impact to historical and archaeological resources. OPRHP concurrence and a determination of No Impact will need to be documented before any State permit for this project can be granted.

At present the proposed building addition and site improvements project has not been designed beyond the concept planning stage necessary to identify its probable cost for purposes of securing the project funding, which includes the essential step of obtaining a positive result in a

¹³ Archaeological Survey Number: 16SR00621. Phase 1A Literature Search and Sensitivity Assessment & Phase 1B Archaeological Field Reconnaissance Survey Croton Harmon School District Transportation Facility Site. 2016. (Study was not available for review.)

At the Transportation site, ambient noise was observed to be low; air quality is expected to be satisfactory; and night lighting was observed on this property and the adjoining Village Public Works property.

Avoidance or Minimization of Potential Impacts

Construction Effects on Ambient Environmental Conditions

Virtually any construction project creates temporary, unavoidable environmental impacts related to construction operations. Noise and air quality impacts typically associated with construction and expected from the proposed project will consist of: noise from the operation of heavy equipment on the site associated with earthwork activities; dust and air pollutant emissions from the operation of construction equipment and soil disturbance; and noise, dust and air emissions from construction traffic relating to equipment arrival/departure, material deliveries and export of excess construction-related materials by trucks.

At the Elementary School site, reconstruction of Spencer Field will involve earthwork and likely some rock removal. At the Middle School / High School, upgrades of the playfields, new paving and reconstruction of a playground will require modest construction activity without the need for major earthmoving. At the Transportation site, there will likely be increased noise and dust from rock removal operations. These short-term impacts can be mitigated somewhat through proper management of the construction process and use of appropriate equipment.

A generalized timeline for the anticipated construction is provided above in the Part 3 Introduction. (A project of this magnitude will require a detailed sequencing and staging schedule necessary to manage multiple contractor operations at these sites.) The demolition and building phases will occur as one continuous construction process with some subphases overlapping a previous event.

The early construction tasks for demolition and site preparation may generate noise above ambient levels for periods of time on and around the site of the work. Noise will come from construction equipment and trucking operations transporting materials to and from the site. Rock removal by blasting (at Spencer Field and the Transportation site) may be required if that is determined to be the best method of rock removal. The means and method of rock removal will need to account for appropriate protection of the buildings on the property and on nearby properties. Construction activities will generate noise at different intensities and for different durations as necessary to accomplish the work. Noise generation above ambient levels is expected to occur periodically from site construction operations.

Short term effects of site construction will typically include elevated air particulate levels (primarily dust and diesel exhaust). Residences in the site vicinity may experience temporary elevated noise levels during the construction, and possibly dust from the demolition and sitework. These are unavoidable effects of construction; however, they will be relatively short in duration. Construction activities will be limited to daylight hours and contractors will be expected to abide by the limits for times of construction permitted by the Village or Town Code.

The type of construction effects described above are manageable and common for a project of this scale. The effects of construction noise, dust and truck traffic are not constant but