



Buffalo and Erie County Industrial Land Development Corporation  
Board of Directors Meeting  
September 23, 2020  
@ 12:30 p.m.

**Via Conference Call and Meeting is being Livestreamed**

**1.0 Call to Order**

**2.0 Approval of Minutes**

2.1 Approval of the August 26, 2020 minutes of the Board of Directors (Action Item) (Pages 2-3)

**3.0 Reports / Action Items / Information Items:**

3.1 Financial Report (Informational Item) (Pages 4-7)

3.2 Finance & Audit Committee Update

a) 2021 Budget Timetable (Informational) (Page 8)

b) Review of 2020 Proposed Budget (Informational) (Pages 9-12)

3.3 Approval of Final Generic Environmental Impact Statement ("GEIS") Master Plan for Bethlehem Steel Property (Action Item) (Pages 13-61)

**4.0 Management Team Report:**

4.1 2021 Board Meeting Schedule (Informational) (Page 62)

**5.0 Adjournment - Next Meeting October 28, 2020 at 1:00 p.m.**

**MINUTES OF THE MEETING  
OF THE BOARD OF DIRECTORS  
OF THE  
BUFFALO AND ERIE COUNTY  
INDUSTRIAL LAND DEVELOPMENT CORPORATION  
(ILDC)**

- DATE AND PLACE:** August 26, 2020, held via telephone conference. Governor Cuomo’s Executive Order 202.1, as amended from time to time, issued in response to the Coronavirus (COVID-19) crisis, suspended Article 7 of the Public Officers Law to the extent necessary to permit any public body to take actions without permitting in public in-person access to such meetings and authorized such meetings to be held remotely by conference call or other similar service, provided the public has the ability to view or listen to such proceedings and that the meeting is recorded and transcribed.
- LIVE STREAMED:** This Board meeting is being live-streamed and made accessible on the Erie County Industrial Development Agency website at [www.ecidany.com](http://www.ecidany.com).
- PRESENT:** Hon. April Baskin, Richard Lipsitz, Jr., Hon. Mark C. Poloncarz and Maria Whyte
- EXCUSED:** Denise Abbott, Hon. Byron W. Brown and Hon. Howard Johnson
- OTHERS PRESENT:** John Cappellino, President & CEO; Mollie Profic, Chief Financial Officer; Atiqa Abidi, Assistant Treasurer; Karen M. Fiala, Assistant Treasurer/Secretary; Gerald Manhard, Chief Lending Officer; Dawn Boudreau, Director of Compliance; Beth O’Keefe, Business Development Officer; Grant Lesswing, Business Development Officer; Brian Krygier, Systems Analyst; Carrie Hocieniec, Administrative Assistant, Robbie Ann McPherson, Pat Smith and Robert G. Murray, Esq., General Counsel/Harris Beach PLLC
- GUESTS:** Andrew Federick, Erie County Senior Economic Development Specialist; Christopher Canada, Esq. on behalf of Hodgson Russ and Tim Korn on behalf of D’Youville College

There being a quorum present at 1:03 p.m., the Meeting of the Board of Directors of the Buffalo and Erie County Industrial Land Development Corporation was called to order by its Chair, Mr. Poloncarz.

## MINUTES

Upon motion made by Mr. Lipsitz and seconded by Ms. Whyte, and upon a vote thereof to so approve, the July 22, 2020 minutes of the ILDC meeting were unanimously approved.

## REPORTS / ACTION ITEMS / INFORMATION ITEMS

Financial Report. Ms. Profic presented the July 2020 financial report. Ms. Profic noted that the balance sheet indicates the ILDC finished the month with total assets of \$9.4 million and net assets of \$7.1 million. The monthly income statement shows income of \$2,300 and negative net expenses of \$36,000. This is due to reclassifications of certain consulting costs to grant expenses. Under special projects there was net revenue of \$6,000. Overall there was net income of \$44,000 for July. The year-to-date income statement shows total revenues of \$3,400 and total expenses of \$59,000, plus net special project income of \$867,000, resulting in net income of \$812,000 so far in 2020. Mr. Poloncarz directed that the report be received and filed.

Finance and Audit Committee Update. Ms. Profic gave a report to the members on the most recent meeting of the committee. She advised that the Finance and Audit Committee will meet again in September to review and recommend the draft budgets. The drafts will be presented at the Board meetings on September 23. Two virtual Q&A sessions for Board members will be scheduled in early October. If there are significant adjustments to the 2021 budgets based on Board feedback, the Committee would then meet again and make an updated recommendation to the Boards. Final budgets will be presented to each Board at their October 28 meeting for approval. Budgets must then be submitted to the ABO by November 1st. Ms. Profic reviewed the 2021 budget, timetable and processes. Mr. Poloncarz directed that the report be received and filed.

Approval of Resolution to Appoint Vice President. Mr. Cappellino reviewed the resolution appointing Karen M. Fiala and Mollie Profic as Vice Presidents of the ILDC. Upon motions made by Ms. Whyte, and seconded by Mr. Lipsitz, the following resolution was then unanimously approved:

RESOLUTION OF THE BUFFALO AND ERIE COUNTY INDUSTRIAL  
LAND DEVELOPMENT CORPORATION (THE "ILDC") APPOINTING  
KAREN M. FIALA AND MOLLIE PROFIC EACH AS VICE PRESIDENT OF  
THE ILDC.

D'Youville College Bond. Ms. Fiala provided background on the project. Ms. Whyte moved and Mr. Lipsitz seconded to approve of the D'Youville Series 2020A and 2020B ILDC Tax Exempt and Taxable Bonds. Mr. Poloncarz called for the vote and the resolution, as attached hereto and made a part of these minutes, was then unanimously approved.

There being no further business to discuss, Mr. Poloncarz adjourned the meeting at 1:13 p.m.

Dated: August 26, 2020

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Karen M. Fiala, Secretary

**Industrial Land Development Corp.**  
**Financial Statements**  
As of August 31, 2020

**INDUSTRIAL LAND DEVELOPMENT CORPORATION ("ILDC")**

**Balance Sheet**

August 31, 2020

	August 2020	July 2020	December 2019
<b>ASSETS:</b>			
Restricted Cash *	\$ 182,679	\$ 197,675	\$ 207,639
Grants Receivable	2,273,084	1,919,084	1,919,084
Other Receivable	4,394	5,492	125,000
Loans Receivable, net	40,571	41,717	36,562
Loan Interest Receivable	-	-	70
Deposit on Land Purchase	-	-	155,638
Total Loan Assets	<u>2,500,727</u>	<u>2,163,967</u>	<u>2,443,992</u>
Capital Assets	6,859,680	6,859,680	5,862,958
Total Assets	<u>\$ 9,360,407</u>	<u>\$ 9,023,647</u>	<u>\$ 8,306,950</u>
<b>LIABILITIES &amp; NET ASSETS:</b>			
Accounts Payable	\$ -	\$ 12,045	\$ 8,844
Due to/(from) ECIDA	226,954	222,121	250,630
Other Liabilities	2,063,533	1,717,624	1,787,558
Total Liabilities	<u>2,290,487</u>	<u>1,951,790</u>	<u>2,047,032</u>
Restricted Fund Balance	7,069,920	7,071,857	6,259,918
Total Liabilities & Net Assets	<u>\$ 9,360,407</u>	<u>\$ 9,023,647</u>	<u>\$ 8,306,950</u>

<b>Loan Portfolio Summary:</b>	<b>August 2020</b>	<b>July 2020</b>	<b>December 2019</b>
# of Loans	<u>3</u>	<u>3</u>	<u>3</u>

\* Cash is invested in interest bearing accounts at M&T Bank.  
The maximum FDIC insured amount is \$250,000 with the remainder collateralized with government obligations by the financial institution.

**INDUSTRIAL LAND DEVELOPMENT CORPORATION ("ILDC")**

**Income Statement**

Month of August 2020

	Actual vs. Budget		
	Actual	Budget	Variance
<b>REVENUES:</b>			
Interest Income - Loans	\$ 70	\$ 19	\$ 50
Interest Income - Cash & Inv.	1	1	(0)
Proceeds from Land Sales	-	20,833	(20,833)
Other Income	750	-	750
<b>Total Revenues</b>	<b>821</b>	<b>20,853</b>	<b>(20,032)</b>
<b>EXPENSES:</b>			
Management Fee - ECIDA	\$ 4,833	\$ 4,833	0
Professional Services	-	4,425	(4,425)
General Office Expenses	-	50	(50)
Other Expenses	-	73	(73)
<b>Total Expenses</b>	<b>4,833</b>	<b>9,381</b>	<b>(4,548)</b>
<b>SPECIAL PROJECT GRANTS:</b>			
Industrial Land Park - ESD	8,097	146,250	(138,153)
Industrial Land Park - ECIDA	-	16,667	(16,667)
Angola Ag Park - ECIDA Grant	3,842	8,333	(4,492)
Other grant revenue	-	2,083	(2,083)
Industrial Land Park grant reimbursement	-	(146,250)	146,250
Industrial Land Park costs	(8,875)	(16,667)	7,792
Angola Ag Park grant costs	(988)	(8,333)	7,346
Other grant expenses	-	(2,083)	2,083
	<b>2,076</b>	<b>(0)</b>	<b>2,076</b>
<b>NET INCOME/(LOSS):</b>	<b>\$ (1,936)</b>	<b>\$ 11,472</b>	<b>\$ (13,408)</b>

\* Represents an allocation of salary and benefit costs from the ECIDA based on time charged to ILDC. The amount booked is currently based on budget.

**INDUSTRIAL LAND DEVELOPMENT CORPORATION ("ILDC")**

**Income Statement**

Year to Date: August 31, 2020

	Actual vs. Budget			Actual vs. Prior Year		
	Actual	Budget	Variance	Actual	Prior Year	Variance
<b>REVENUES:</b>						
Interest Income - Loans	\$ 466	\$ 153	\$ 313	\$ 466	\$ 232	\$ 234
Interest Income - Cash & Inv.	11	7	6	11	11	0
Grant Income	-	-	-	-	155,000	(155,000)
Proceeds from Land Sales	-	166,667	(166,667)	-	-	-
Other Income	3,750	-	3,750	3,750	36,250	(32,500)
<b>Total Revenues</b>	<b>4,228</b>	<b>166,827</b>	<b>(162,598)</b>	<b>4,228</b>	<b>191,494</b>	<b>(187,266)</b>
<b>EXPENSES:</b>						
Management Fee - ECIDA	\$ 38,667	\$ 38,667	0	\$ 38,667	\$ 19,200	\$ 19,467
Professional Services	10,176	35,400	(25,224)	10,176	75,971	(65,795)
General Office Expenses	10,402	400	10,002	10,402	-	10,402
Other Expenses	4,656	583	4,072	4,656	1,202	3,454
<b>Total Expenses</b>	<b>63,901</b>	<b>75,050</b>	<b>(11,149)</b>	<b>63,901</b>	<b>96,373</b>	<b>(32,472)</b>
<b>SPECIAL PROJECT GRANTS:</b>						
Industrial Land Park - ESD	53,267	1,170,000	(1,116,733)	53,267	1,390,000	(1,336,733)
Industrial Land Park - ECIDA	125,000	133,333	(8,333)	125,000	200,000	(75,000)
Angola Ag Park - ECIDA Grant	848,137	66,667	781,471	848,137	(1,390,000)	2,238,137
Other grant revenue	24,740	16,667	8,073	24,740	104,836	(80,096)
Industrial Land Park grant reimbursement	-	(1,170,000)	1,170,000	-	-	-
Industrial Land Park costs	(151,571)	(133,333)	(18,238)	(151,571)	(96,683)	(54,888)
Angola Ag Park grant costs	(5,158)	(66,667)	61,509	(5,158)	-	(5,158)
Other grant expenses	(24,740)	(16,667)	(8,073)	(24,740)	(104,836)	80,096
	<b>869,675</b>	<b>0</b>	<b>869,675</b>	<b>869,675</b>	<b>103,317</b>	<b>766,358</b>
<b>NET INCOME/(LOSS):</b>	<b>\$ 810,002</b>	<b>\$ 91,777</b>	<b>\$ 718,226</b>	<b>\$ 810,002</b>	<b>\$ 198,437</b>	<b>\$ 611,565</b>

\* Represents an allocation of salary and benefit costs from the ECIDA based on time charged to ILDC. The amount booked is currently based on budget.

**ERIE COUNTY INDUSTRIAL DEVELOPMENT AGENCY (ECIDA)  
 BUFFALO & ERIE COUNTY REGIONAL DEVELOPMENT CORP (RDC)  
 BUFFALO & ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORP (ILDC)**

**2021 Budget Review Process**

<b>Date</b>	<b>Description</b>	
July-August	Review of draft 2021 budgets by ECIDA management. (a) Prioritize any proposed budget requests for initiatives. (b) Formal budget requests compiled.	✓
August 18 <sup>th</sup>	Finance & Audit Committee meeting – initial review of proposed budgets.	✓
September 16 <sup>th</sup>	Finance & Audit Committee meeting to discuss any updates/recommend proposed budgets to Boards.	✓
September 23 <sup>rd</sup>	Review of 2021 draft budgets at Board meetings.	
October 2 <sup>nd</sup> at 10:00 a.m.	Board Q&A budget session #1 (voluntary).	
October 6 <sup>th</sup> at 2:00 p.m.	Board Q&A budget session #2 (voluntary).	
October	Adjustments to budget based on Board feedback and Finance & Audit Committee approval of final budgets ( <i>if necessary</i> ).	
October 28 <sup>th</sup>	Board meeting – action to approve final 2021 budgets.	
November 1 <sup>st</sup>	Deadline for final approved budget to be submitted to the ABO.	



**Industrial Land Development Corp**  
**2021 Proposed Budget**

# *Industrial Land Development Corporation (ILDC)*

## **2021 Budget + 3 Year Forecast**

The Industrial Land Development Corporation (“ILDC”) consists of two sub-funds (Erie County’s Business Development Fund (“BDF”) and a general fund. The ILDC administers the BDF microloan fund on behalf of Erie County for HUD-eligible small businesses that would not otherwise be able to obtain such financing from commercial sources. The ILDC also issues tax-exempt bonds on behalf of various not-for-profit organizations in Erie County.

### **A. Overview of Changes in 2021 Budget:**

A summary of the key changes between the 2021 budget and the projected 2020 results:

- The Erie County BDF microloan fund has been reprogrammed into a loan/grant program in the wake of the COVID-19 pandemic, and an increase in recipients under this program is expected in 2021.
- The ECIDA Management Fee represents a fee charged by the ECIDA for services that its employees provide, since ILDC has no employees of its own. The fee is expected to decrease by approximately \$13,000 due to anticipated decreases in time spent on ILDC projects by ECIDA staff.
- Land owned by the ILDC has increased in 2020 with the acquisition of 242 acres in the Town of Evans, NY. Professional services consist of legal, consulting, and auditing costs, and are budgeted to increase by about \$28,000 or 54% in 2021. This is due to the legal costs associated with land owned and environmental consulting costs anticipated in 2021. Development and marketing costs are expected to increase in 2021 as well, with the intent to sell property that is owned in both Evans and Lackawanna, NY.
- The Special Projects section of the budget relates to grants. ILDC expects to recognize \$1.55 million from Empire State Development in 2021 to offset the cost of purchasing the additional land at the former Bethlehem Steel site. A total of \$300,000 is budgeted to be used in 2021 for carrying costs related to the Bethlehem Steel and Agribusiness Park properties, which will be granted by ECIDA’s UDAG fund. Other grant revenue consists of \$2.5 million for infrastructure at the Bethlehem Steel site and \$450,000 for the Agribusiness Park.

### **B. Summary of Risk Factors impacting the 2021 Budget:**

The following significant risk factors may influence the 2021 budget:

1. Due to numerous uncertainties, the value of collateral, guarantees, etc., the ILDC may experience loan losses that are currently not included in the budget.
2. In the past, the ILDC has generated fee income from issuing tax-exempt debt. These monies are received directly by ILDC and then paid to ECIDA. However, due to the infrequent nature of these activities, and the uncertainty as to when such transactions will occur, ILDC has not included any bond closings in the 2021 budget. It is possible a tax-exempt bond is issued within the next year and both income and expenses will be recognized, accordingly.

**BUFFALO & ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION ("ILDC")**  
**Proposed Budget for 2021**

	<b>Proposed Budget 2021</b>	<b>Approved Budget 2020</b>	<b>Projected 2020</b>	<b>Actual 2019</b>
<b>REVENUES:</b>				
Interest Income - Loans	\$ 4,500	\$ 230	\$ 680	\$ 539
Interest Income - Cash & Investments	20	10	19	14
County Contribution Income	-	-	-	170,000
Proceeds from Land Sales	250,000	250,000	-	-
Other Income	9,000	-	9,000	70,041
<b>Total Revenues</b>	<b>263,520</b>	<b>250,240</b>	<b>9,699</b>	<b>240,594</b>
<b>EXPENSES:</b>				
ECIDA Management Fee*	\$ 60,000	\$ 58,000	73,000	\$ 61,471
Professional Services	80,000	53,100	51,805	39,660
Development & Marketing Expenses	25,000	600	11,843	-
Other Expenses	2,375	875	5,965	3,897
<b>Total Expenses</b>	<b>167,375</b>	<b>112,575</b>	<b>142,613</b>	<b>105,028</b>
<b>SPECIAL PROJECTS:</b>				
Industrial Land Park purchase - ESD grant	1,555,000	1,755,000	200,000	-
Industrial Land Park carrying costs - ECIDA grant	200,000	200,000	125,000	220,000
Angola Ag Park carrying costs - ECIDA grant	100,000	100,000	864,296	-
Other grant revenue	2,950,000	25,000	32,560	156,974
Industrial Land Park grant reimbursement	-	(1,755,000)	-	(375,000)
Industrial Land Park grant costs	(200,000)	(200,000)	(283,415)	(132,889)
Angola Ag Park grant costs	(100,000)	(100,000)	(7,053)	-
Other grant expenses	(2,950,000)	(25,000)	(32,560)	(906,974)
Workforce Retention Fund	-	-	-	500,000
	<b>1,555,000</b>	<b>-</b>	<b>898,828</b>	<b>(537,889)</b>
<b>NET INCOME/(LOSS) BEFORE DEPRECIATION:</b>	<b>\$ 1,651,145</b>	<b>\$ 137,665</b>	<b>\$ 765,914</b>	<b>\$ (402,323)</b>
Depreciation	350	-	350	325
<b>NET INCOME/(LOSS):</b>	<b>\$ 1,650,795</b>	<b>\$ 137,665</b>	<b>\$ 765,564</b>	<b>\$ (402,648)</b>

\* Represents an allocation of salary and benefit costs from the ECIDA based on staff time charged to the ILDC.

**BUFFALO & ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION ("ILDC")**  
**Proposed Three Year Forecast 2022-2024**

	<b>Proposed Budget 2021</b>	<b>Forecast 2022</b>	<b>Forecast 2023</b>	<b>Forecast 2024</b>
<b>REVENUES:</b>				
Interest Income - Loans	\$ 4,500	\$ 3,372	\$ 2,022	\$ 910
Interest Income - Cash & Investments	20	25	25	25
Proceeds from Land Sales	250,000	250,000	250,000	200,000
Other Income	9,000	-	-	-
Total Revenues	<u>263,520</u>	<u>253,397</u>	<u>252,047</u>	<u>200,935</u>
<b>EXPENSES:</b>				
ECIDA Management Fee*	\$ 60,000	\$ 55,000	\$ 55,000	\$ 55,000
Professional Services	80,000	50,000	50,000	50,000
Development & Marketing Expenses	25,000	15,000	15,000	15,000
Other Expenses	2,375	2,500	4,000	5,000
Total Expenses	<u>167,375</u>	<u>122,500</u>	<u>124,000</u>	<u>125,000</u>
<b>SPECIAL PROJECTS:</b>				
Industrial Land Park purchase - ESD grant	1,555,000	-	-	-
Industrial Land Park carrying costs - ECIDA grant	200,000	200,000	-	-
Angola Ag Park carrying costs - ECIDA grant	100,000	100,000	-	-
Other grant revenue	2,950,000	-	-	-
Industrial Land Park grant costs	(200,000)	(200,000)	-	-
Angola Ag Park grant costs	(100,000)	(100,000)	-	-
Other grant expenses	(2,950,000)	-	-	-
	<u>1,555,000</u>	<u>-</u>	<u>-</u>	<u>-</u>
<b>NET INCOME/(LOSS) BEFORE DEPRECIATION:</b>	<u>\$ 1,651,145</u>	<u>\$ 130,897</u>	<u>\$ 128,047</u>	<u>\$ 75,935</u>
Depreciation	350	350	350	350
<b>NET INCOME/(LOSS):</b>	<u>\$ 1,650,795</u>	<u>\$ 130,547</u>	<u>\$ 127,697</u>	<u>\$ 75,585</u>

\* Represents an allocation of salary and benefit costs from the ECIDA based on staff time charged to the ILDC.



MEMORANDUM  
September 23, 2020

To: Members of the Board of Directors of the Buffalo and Erie County Industrial Land Development Corporation

Re: Acceptance of Final Generic Environmental Impact Statement

The Buffalo and Erie County Industrial Land Development Corporation (“ILDC”) engaged the services of AECOM to develop a Masterplan and a Generic Environmental Impact Statement (GEIS) for the redevelopment of 240 acres of the former Bethlehem Steel site. The masterplan and GEIS focus on the road, utility and parcel layouts and the associated environmental impacts of the proposed development at full buildout. As part of the process the ILDC has held 2 public meetings to receive input from the public, interested and involved agencies on the masterplan and environmental review. The ILDC accepted the Draft GEIS and held a public hearing on June 29<sup>th</sup>, comments received have been reviewed and addressed in the Final GEIS as appropriate.

As a result, the Final GEIS has been prepared and is ready to be accepted as complete.

**Requested Actions ILDC:**

Seeking approval to accept the Final GEIS as complete and to submit copies to all involved agencies, as well as to any individual requesting a copy.

**BUFFALO AND ERIE COUNTY INDUSTRIAL LAND  
DEVELOPMENT CORPORATION**

**FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT ACCEPTANCE  
RESOLUTION**

*(BETHLEHEM STEEL SITE)*

A regular meeting of the Buffalo and Erie County Industrial Land Development Corporation was convened on Wednesday, September 23, 2020, at 1:00 p.m.

The following resolution was duly offered and seconded, to wit:

RESOLUTION OF THE BUFFALO AND ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION ACCEPTING THE FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR THE ADVANCED MANUFACTURING PARK INFRASTRUCTURE MASTER PLAN

WHEREAS, the Buffalo and Erie County Industrial Land Development Corporation (the “ILDC”) owns approximately 150 acres of real property located within the former Bethlehem Steel Site in Lackawanna, New York, and is currently in negotiations to purchase an additional 92 acre parcel of real property also located within the former Bethlehem Steel Site in Lackawanna, New York (collectively, the “Real Property”); and

WHEREAS, the ILDC, in its efforts to establish an infrastructure and master plan for the Real Property (the “Project”), must first comply with Article 8 of the New York Environmental Conservation Law and the regulations adopted thereto at 6 N.Y.C.R.R. Part 617 (collectively referred to as “SEQRA”); and

WHEREAS, the ILDC is the Lead Agency conducting a coordinated review of the Project pursuant to SEQRA; and

WHEREAS, the ILDC accepted a Draft Generic Environmental Impact Statement (the “DGEIS”) for the Project on May 27, 2020; and

WHEREAS, a public hearing on the DGEIS was held on June 29, 2020, and a public comment period was provided from May 27, 2020 through July 9, 2020; and

WHEREAS, the ILDC has now received and reviewed the Final Generic Environmental Impact Statement (“FGEIS”) prepared for the Project.

NOW, THEREFORE, BE IT RESOLVED BY THE MEMBERS OF THE BOARD OF DIRECTORS OF THE BUFFALO AND ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION AS FOLLOWS:

Section 1. The ILDC hereby accepts the FGEIS as submitted pursuant to 6 N.Y.C.R.R. § 617.9 as complete and directs that copies of the FGEIS be provided to all involved agencies, as well as to any individual requesting a copy.

Section 2. Pursuant to 6 N.Y.C.R.R. § 617.9(a)(6), the ILDC shall prepare, file, and publish a notice of completion of the FGEIS in accordance with 6 N.Y.C.R.R. §617.12.

Section 3. Pursuant to 6 N.Y.C.R.R. § 617.11(a), the ILDC shall afford all involved and interested agencies, as well as the public, ten (10) calendar days to consider the FGEIS before the ILDC issues its written findings statement as required under SEQRA.

Section 4. The ILDC hereby authorizes and directs that the ILDC's staff, agents, and consultants undertake any other and further action as may be necessary pursuant to SEQRA in order to meet the ILDC's obligations as Lead Agency.

Section 5. This Resolution shall take effect immediately upon adoption.

Dated: September 23, 2020

**BUFFALO AND ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION**  
**ADVANCED MANUFACTURING PARK - INFRASTRUCTURE MASTER PLAN**  
**CITY OF LACKAWANNA, ERIE COUNTY, NEW YORK**

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**FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT**  
**Volume I -FGEIS**

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**PROJECT SPONSOR AND LEAD AGENCY:**

**Buffalo and Erie County Industrial Land Development Corporation**  
**95 Perry Street, Suite 403, Buffalo, New York 14203**  
**716-856-6525**

**PREPARED BY:**

**AECOM USA, Inc.**  
**257 West Genesee Street, Suite 400, Buffalo, New York 14202-2657**

**WWS Planning**  
**4915 Pineledge Drive North, Clarence, NY 14031**

**Watts Architecture and Engineering**  
**95 Perry Street, Suite 300, Buffalo, NY 14203**

**Environmental Design & Research**  
**217 Montgomery Street, Suite 1000, Syracuse, NY 13202**

**Date Accepted by Lead Agency: May 27, 2020**

**Public Hearing Date: June 29, 2020**

**Public Comments Accepted Through: July 9, 2020**

**September 11, 2020**



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## **List of Appendices**

- Appendix A    Executive Summary - Draft GEIS for ILDC Infrastructure Master Plan, May 2020
- Appendix B    Public and Agency Written Comments
- Appendix C    Traffic Impact Studies
- 2020 Addendum to Traffic Impact Study
  - 2019 Traffic Impact Study
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# 1 Introduction – Project Description

---

In May 2020, the Buffalo and Erie County Industrial Land Development Corporation (ILDC) completed a Draft Generic Environmental Impact Statement (GEIS) and Infrastructure Master Plan to guide development of the ILDC Advanced Manufacturing Park on a portion of the former Bethlehem Steel Corporation (BSC) steel plant in Lackawanna, New York (the Master Plan or Project). This Final GEIS was prepared by the ILDC, acting as the Lead Agency pursuant to the State Environmental Quality Review Act and its implementing regulations promulgated thereto in 6 NYCRR Part 617 (collectively, referred to as SEQRA).

The purpose of a Final GEIS is to present public and agency comments on the Draft GEIS and provide the Lead Agency’s responses to substantive comments. The Final GEIS also includes revisions and addenda to the Draft GEIS and includes (by reference) the Draft EIS. Together the Draft and Final GEIS documents and their appendices comprise the complete GEIS for the Project. This Final GEIS includes four new appendices. A summary of the full Draft GEIS is provided by the Executive Summary, found in Appendix A. Appendix B provides the substantive written agency and public comments on the Draft GEIS. Appendix C includes an addendum to the Traffic Impact Study and Appendix D includes the SEQR documentation and key correspondence.

## 1.1 Proposed Action

The ILDC prepared the Draft GEIS to assess the potential environmental impacts that may result from implementation of the Infrastructure Master Plan for the ILDC Advanced Manufacturing Park. Adoption and implementation of the Infrastructure Master Plan constitutes one of the State or local activities subject to SEQRA that involve undertaking, funding or approving the Project; these activities are the Proposed Action (or Action).

The Project will result in the installation of streets, water, sewer, stormwater management facilities, and private utilities in support of the future build-out of one or more individual development lots to be located on the site for a mix of commercial, business, and light and medium intensity manufacturing and industrial facilities. The number of development lots that will ultimately be created and sold remains to be determined, depending on market demand. Thresholds and standards for future development have been established to ensure that private development and state or municipal decisions proceed in accordance with

the Master Plan and within the parameters established by this GEIS.

The Proposed Action also includes the City of Lackawanna's review of the Master Plan for consistency with requirements of the City's subdivision regulations, zoning code, and consistency with the applicable policies and recommendations in the City's Local Waterfront Revitalization Program (LWRP) and Brownfield Opportunity Area (BOA) plan.

The Infrastructure Master Plan was prepared to support an application for Shovel Ready Certification under the Build Now New York Program as a Multi-Tenant Business and Technology Park. The Shovel Ready Certification Application is anticipated to include the following elements:

- Shovel Ready Self-Evaluation Checklist,
- Shovel Ready Certification Application, and
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  - SEQR compliance including GEIS and Findings Statement
  - Site Survey
  - Soil Survey map
  - Preliminary SWPPP
  - Traffic Impact Study
  - Wetlands Mapping

## 1.2 Site Description

The Project Site is unchanged since development of the Master Plan and Draft GEIS. It consists of approximately 244-acres of the former BSC steel plant located at 2303 Hamburg Turnpike (west side) in the City of Lackawanna between its borders with the City of Buffalo to the north and the Town of Hamburg to the south (the Project Site). The Project Site is comprised of tax map parcel SBL 141.11-1-48-13 and a portion of tax map parcel SBL 141.11-1-48.11. The ILDC has purchased (or is in the process of purchasing) from Tecumseh Redevelopment, Incorporated (Tecumseh) the portions of the former BSC steel plant

known as Business Park I and Business Park II, with the larger planning area referred to as the Bethlehem Steel Redevelopment Area (BSRA). The total Project Site consists of approximately 244 acres, of which the ILDC currently owns approximately 154 acres and is in the process of purchasing approximately 90 acres from Tecumseh. In December 2019, the ILDC conveyed 24 acres off Dona Street to Time Release Properties, LLC. (Lot 4 on the Master Plan) for the purpose of constructing a manufacturing facility.

Figure 1 depicts the Site Location Map. Figure 2 depicts an aerial view of the Project Site with the Master Plan's lot configuration overlain.

The Project Site is principally vacant and unoccupied by buildings. However, in the past the Project Site was developed with numerous buildings and structures utilized by BSC as part of its steel plant operations. With the exception of one building, all the former steel plant facilities have been demolished on the Project Site. The one building exception is an approximately 18,000 square foot vacant building (former locomotive repair shop) which is located on Lot 4. Other built features on-site include internal access roads, newly constructed Dona Street, the Bethlehem Shoreline Trail recreation path, relocated South Buffalo Railway tracks, overhead electric, water, and sewer services, and a natural gas pipeline owned by National Fuel Gas. However, numerous foundations and subsurface structures remain below the surface. Also located within the bounds of the Project Site are two electrical substations on out-parcels totaling approximately 1.4 acres, which are not included in the ILDC's 243.7-acre Project Site.

**BUFFALO AND ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION**

**ADVANCED MANUFACTURING PARK - INFRASTRUCTURE MASTER PLAN  
CITY OF LACKAWANNA, ERIE COUNTY, NEW YORK**

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**FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT**

**Volume I -FGEIS**

---

**PROJECT SPONSOR AND LEAD AGENCY:**

**Buffalo and Erie County Industrial Land Development Corporation  
95 Perry Street, Suite 403, Buffalo, New York 14203  
716-856-6525**

**PREPARED BY:**

**AECOM USA, Inc.  
257 West Genesee Street, Suite 400, Buffalo, New York 14202-2657**

**WWS Planning  
4915 Pineledge Drive North, Clarence, NY 14031**

**Watts Architecture and Engineering  
95 Perry Street, Suite 300, Buffalo, NY 14203**

**Environmental Design & Research  
217 Montgomery Street, Suite 1000, Syracuse, NY 13202**

**Date Accepted by Lead Agency: May 27, 2020**

**Public Hearing Date: June 29, 2020**

**Public Comments Accepted Through: July 9, 2020**

**September 11, 2020**

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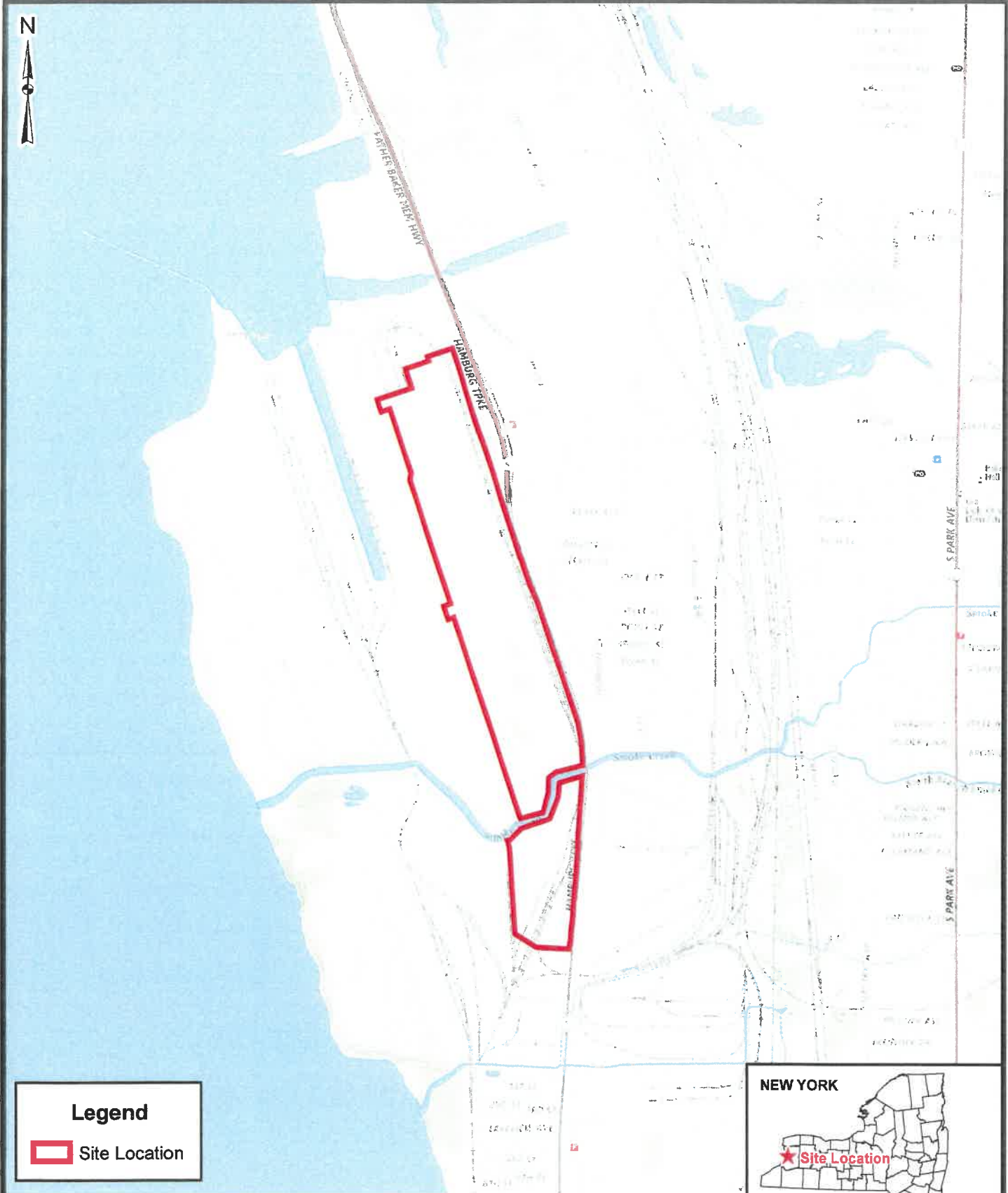
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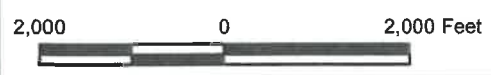
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J:\Projects\60568845\_BSR\MP1900\_CAD\_GIS\1920\_GISMAPS\DIGEIS\01\_SITE\_LOCATION.mxd 2/10/2020



**Legend**

 Site Location



Source: USGS 1:24,000-scale topographic map, 7.5 x 7.5 Minute Quadrangle: Buffalo SE, 2016



**ADVANCED MANUFACTURING PARK - INFRASTRUCTURE MASTER PLAN**  
**BUFFALO AND ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION**  
**LACKAWANNA, NEW YORK**  
**SITE LOCATION MAP**

**FIGURE 1**



IR	DATE	DESCRIPTION



LOT DATA			
LOT NO.	GROSS AREA (ACRES)	DEVELOPABLE AREA* (ACRES)	EXISTING ZONING
1	41.7	33.4	BRA-MI
2	9.9	7.4	BRA-LI
3	13.1	10.5	BRA-MI
3A	5.8	4.6	BRA-MI
4	24.1	19.3	BRA-MI
4A	10.0	8.0	BRA-MI
5	8.5	6.4	BRA-LI
6	9.1	6.6	BRA-LI
7	65.6	51.9	BRA-LI & BRA-MI
8	10.8	8.8	BRA-MI
9	6.5	4.9	BRA-LI
10	11.7	8.5	BRA-LI & BRA-MI
SUBTOTAL	217.7	170.3	
EXISTING ROAD RIGHT OF WAY (DONA STREET)	2.4	N/A	N/A
PROPOSED ROAD RIGHT OF WAY	10.7	N/A	N/A
SHORELINE TRAIL (EXISTING AND FUTURE) & TRAIL HEAD PARKING	11.5	N/A	N/A
GREENSPACE	1.4	N/A	N/A
OUTPARCELS	1.4	N/A	N/A
TOTAL	245.1**	170.3	

\* NOT INCLUDING PROPOSED STREET R.O.W. AND SHORELINE TRAIL EASEMENT  
 \*\* GROSS AREA FOR LOTS 2, 3, 7, 8 & 9 INCLUDE RIGHT OF WAY FOR FUTURE PUBLIC STREETS (10.7 ACRES)

**LEGEND:**

- ILDC PROPERTY BOUNDARY
- PROPOSED LOT BOUNDARY
- ZONING BOUNDARY
- EXISTING PRIVATE ROAD
- RAILROAD TRACK
- 50' WIDE EASEMENT BETHLEHEM SHORELINE TRAIL
- PROPOSED 1 ACRE TRAIL HEAD AREA
- POTENTIAL EXTENSION OF SHORELINE TRAIL EASEMENT
- WATER BODY
- UTILITY SUBSTATION
- PROPOSED PUBLIC STREET RIGHT-OF-WAY (100')
- POTENTIAL FUTURE PUBLIC STREET RIGHT-OF-WAY
- UNDEVELOPED / GREENSPACE
- EXISTING TRAFFIC SIGNAL
- POTENTIAL FUTURE BRIDGE

## 1.3 Project Description

Implementation of the Master Plan will result in the installation of public streets, water, sewer, and private utility infrastructure. The Master Plan was prepared to support the future subdivision and redevelopment of the site for a mix of commercial, business, advanced manufacturing, and light and medium intensity industrial facilities consistent with the land uses allowed in the Bethlehem Redevelopment Area - Light and Medium Industry zoning districts. The ILDC intends to subdivide and sell individual lots for private development. The Infrastructure Master Plan anticipates the creation of approximately twelve separate lots ranging in size from 5.8 acres to 66.6 acres. The conceptual lots are arranged along a proposed street layout that provides access to one of four new public streets. The internal street layout accesses NYS Route 5 from extensions of Ridge Road, Odell Street, Madison Street, and the recently completed extension of Dona Street into the Project Site. The Master Plan depicts a total of approximately 8,950 linear feet of new streets. Each proposed lot has frontage and access along 4,025 linear feet of proposed streets. An additional 4,925 linear feet of potential future streets provide flexibility to accommodate further subdivision of the proposed lots into additional small development lots, if the demand warrants. The potential future streets would also provide interconnection between the four access points to NYS Route 5. The Master Plan also provides alignments for proposed water and sanitary sewer utilities. The Master Plan presents the minimal required infrastructure and utilities to serve each of the individual development lots. Similar to the proposed road layout, proposed utility alignments are flexible to accommodate further subdivision or other lot configurations. Conceptual Site Plans are included in Appendix E of the Engineers Report, which is appended to the Draft GEIS.

The Master Plan is intended to facilitate a shovel ready project that can be modified to meet the market demand in terms of lot size, access, and infrastructure. The lot configuration can be adjusted depending on how lots are sold/assembled and is capable of being developed in phases. The Infrastructure Master Plan is presented in Draft GEIS Figure 2 overlain on aerial photography and Draft GEIS Figure 4 in a conceptual build-out depicting maximum coverages under existing zoning.

## **1.4 Project Changes Since Draft GEIS**

### **1.4.1 Infrastructure Master Plan**

Since publication of the Draft GEIS, there have been no substantial design changes to the Master Plan. One additional drawing was added in order to better depict the preliminary water and sanitary sewer utility alignments. While the preliminary water and sewer utilities are provided in the Engineers Report (Appendix A of Draft GEIS), they are now also presented on Figure 9, Sheet C-2D - Water and Sewer within the body of the Draft GEIS in the same format and scale as other Master Plan figures. Proposed alignments for natural gas and electric utilities are also shown on the presented in the drawing set attached to the Engineers Report.

### **1.4.2 Lot Sales**

Since the preparation of the Master Plan, there has been activity regarding sales of proposed lots identified on the Master Plan.

Lot 4 has been sold to Time Release Properties, LLC and is currently under development. The proposed 280,000 s.f. light manufacturing facility building meets the applicable zoning standards and received Site Plan Approval from the City of Lackawanna Planning Board. The facility will manufacture foam-based cleaning products, which is consistent with the anticipated uses in the Advanced Manufacturing Park. The proposed development area of approximately 13 acres is within the maximum developable area established by the Master Plan and within the maximum lot coverage area allowed by City of Lackawanna Zoning for the Medium Industrial District (BRA-MI). In addition proposed development did not change access or lot configuration from the Master Plan. Therefore, no change to the Master Plan maps or Draft GEIS are required.

Lot 5 has been allocated for a new manufacturing space that will address the regional need for vacant industrial-zoned property to attract new and growing manufacturing companies. In February 2020, a request for proposals (RFP) was issued by the ILDC to potential developers to purchase and develop Lot 5. The RFP seeks proposals for construction of a new 120,000 sq. ft. flexible light manufacturing/warehouse space that can be configured for a range of 1 to 3 tenant facilities. The ILDC staff are currently reviewing the RFP responses. The RFP limits the use of the property to those uses allowed by the zoning and anticipated in the Advanced Manufacturing Park; the lot configuration matches the Master Plan; and the

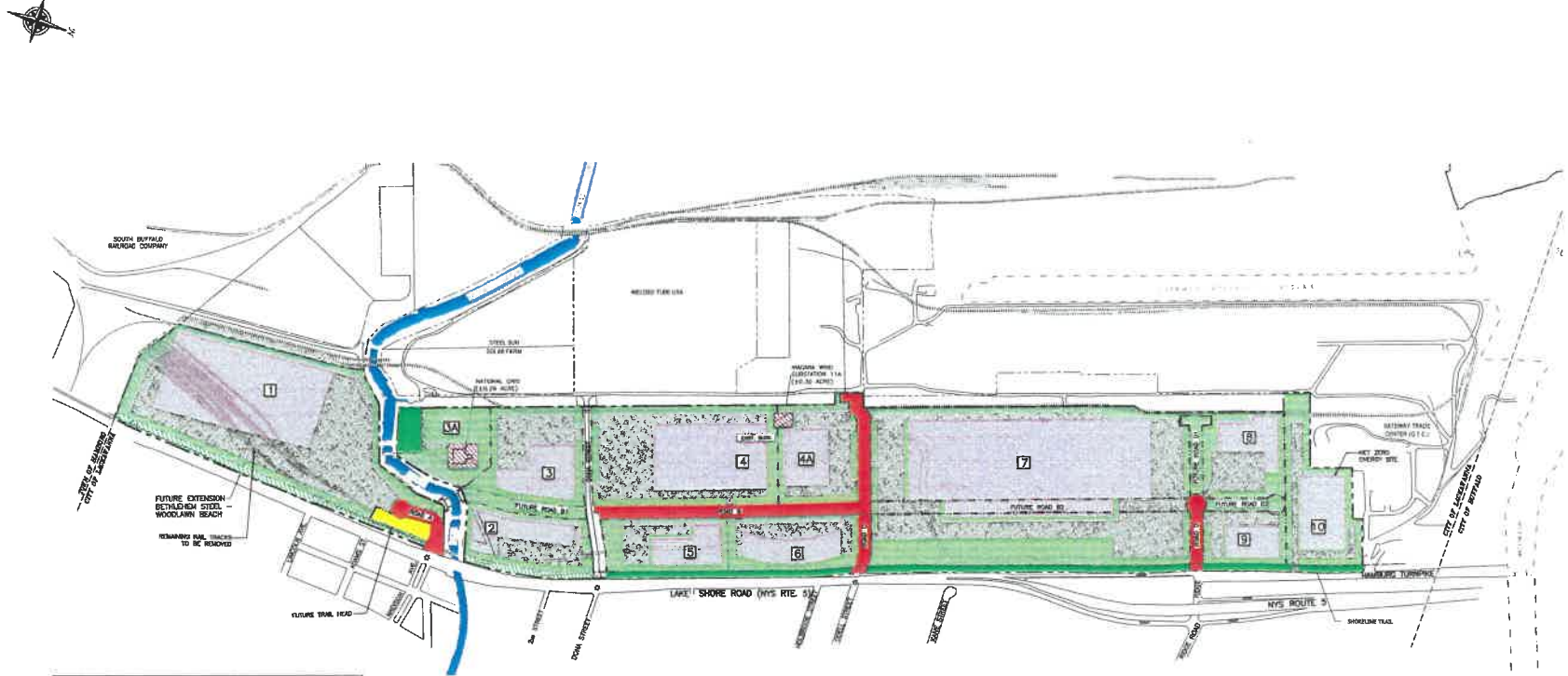
size of the development is within the parameters established by the Master Plan and Draft GEIS. Therefore, no changes to the Master Plan maps or Draft GEIS are required. Table 1 shows updated proposed building and total lot development areas for Lots 4 and 5.

Table 1: Proposed Lot Development

Lot Number	Lot Area (Acres)	Master Plan Maximum Development Area / Lot Coverage (Acres)	Proposed Building Area (s.f.)	Total Proposed Development Area / Lot Coverage (Acres)
4	24.1	19.3	280,000	13.4
5	8.5	6.4	120,000	5.5



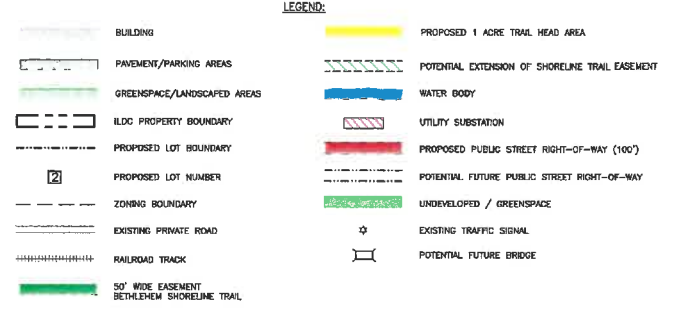
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10	11.7	8.5	BRA-LI & BRA-MI
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GREENSPACE	1.4	N/A	N/A
OUTPARCELS	1.4	N/A	N/A
<b>TOTAL</b>	<b>245.3**</b>	<b>170.3</b>	

\* NOT INCLUDING PROPOSED STREET R.O.W. AND SHORELINE TRAIL EASEMENT  
 \*\* GROSS AREA FOR LOTS 2, 3, 7, 8 & 9 INCLUDE RIGHT OF WAY FOR FUTURE PUBLIC STREETS (10.7 ACRES)

ZONING REQUIREMENTS	BRA-LI	BRA-MI
MINIMUM LOT SIZE	5 ACRES, OR 50 ACRES FOR PUD	8 ACRES, OR 50 ACRES FOR PUD
MINIMUM LOT FRONTAGE	300 FEET	500 FEET
MAXIMUM BUILDING HEIGHT	35 FEET OR 3 STORIES	60 FEET
MINIMUM FRONT YARD	30 FEET / 30-FOOT SETBACK REQUIRED FROM NYS ROUTE 5 AND HAMBURG TURNPIKE ROW	50 FEET
MINIMUM SIDE YARD	25 FEET	50 FEET
MINIMUM REAR YARD	NA	50 FEET
MINIMUM BUFFER TO SMOKE CREEK GREENWAY CORRIDOR OVERLAY DISTRICT BOUNDARY	50 FEET	50 FEET
MINIMUM BUILDING COVERAGE	15%	18%
MAXIMUM LOT COVERAGE (INCLUDING PARKING)	75%	80%
MINIMUM LANDSCAPING COVERAGE	22%	20%



**FIGURE 4**  
**PROJECT NUMBER**  
60568845  
**SHEET TITLE**  
 CONCEPT INFRASTRUCTURE  
 MASTER PLAN (BUILD-OUT)  
 DRAFT - OCTOBER 2019  
**SHEET NUMBER**  
 C-2A



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## 2 State Environmental Quality Review Process

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This section of the Final GEIS presents the general process undertaken by the ILDC, serving as the SEQR Lead Agency for the implementation and build-out of the Infrastructure Master Plan for the Advanced Manufacturing Park. A summary of the key SEQR procedural steps is presented in Table 2 SEQR Chronology in Section 2.5. Appendix D contains key correspondence and documentation related to the SEQR process followed for this GEIS.

### 2.1 Purpose and Limitations of the Final GEIS

The intent of this section of the Final GEIS is to present the public and agency comments on the Draft GEIS and the Lead Agencies responses to the substantive comments. This Final GEIS incorporates, by reference the Draft GEIS, its appendices and supporting studies as it was accepted by the Lead Agency. Revisions to the Draft GEIS are described within Section 3 of this Final GEIS. Therefore, the Draft GEIS will not be republished.

The Lead Agency presents all the substantive comments in a manner that does not alter their intent. Comments or questions not directly related to the Project, or to the Draft GEIS are included but not all are addressed in detail.

### 2.2 Draft GEIS and Public Comment Period

After the ILDC Board accepted the Draft GEIS as complete and ready for public and agency review on May 27, 2020, a notice was published in the NYSDEC Environmental Notice Bulletin, formally beginning the public and agency comment period. Hard copies of the Draft GEIS were made available for review at the following locations:

- ILDC - 95 Perry Street - Suite 403, Buffalo, NY 14203
- NYSDEC - Region 9 Office, 270 Michigan Avenue, Buffalo, NY 14203
- City of Lackawanna City Hall, 714 Ridge Road, Lackawanna
- City of Lackawanna Public Library, 560 Ridge Road, Buffalo

In addition to hard copies, the public could review the Draft GEIS online as posted on the following applicant's websites:

- <http://lackawannany.gov/development/>

- <https://www.ecidany.com/event/101078/notice-of-seqr-public-hearing-infrastructure-master-plan-for-advanced-manufacturing-park>

Given the NYS Governor's Executive Orders in response to the on-going COVID-19 pandemic, the associated public hearing was held remotely through a web-based meeting platform with public participation instructions appropriately published within the public hearing notice. The public hearing was held on June 29, 2020 and written comments were received through July 9, 2020.

Comments on the Draft GEIS are presented in Section 4, along with the Lead Agency's responses. Full copies of written comments received are provided in Appendix B.

## **2.3 Final GEIS**

As described in Section 1, the purpose of this Final GEIS is to present public and agency comments on the Draft GEIS and provide the Lead Agency's responses to substantive comments. A Final GEIS also includes any revisions and addenda to the Draft GEIS, found in Section 3. The Final GEIS also includes (by reference) the Draft GEIS.

## **2.4 Findings Statement**

The final step in the SEQR process is the preparation of a Findings Statement by the Lead Agency at the time a final decision is made regarding the Proposed Action (undertaking, funding or approving the Project). Findings are made after the Final EIS has been accepted.

The Findings Statement will be a written document, prepared after the ILDC issues the Final GEIS. An agency's Findings Statement must articulate the agency's balancing of adverse environmental impacts against the needs for and benefits of the Action. The Findings Statement identifies the social and economic, as well as environmental, considerations that have been weighed in making a decision to approve or disapprove an Action. A positive Findings Statement means that, after consideration of the Final GEIS, the Project or Action can be approved, and the Action chosen is the one that minimizes or avoids environmental impacts to the maximum extent practicable. For an Action which can be approved, an agency's Findings Statement must articulate that agency's balancing of adverse environmental impacts against the needs for and benefits of the action. If the Action cannot be approved based on analyses in the Final GEIS, a negative findings statement must be prepared, documenting the reasons for the denial.

SEQRA requires the Lead Agency to wait at least ten days after the filing of the Final GEIS before making their findings and final decisions on the Action. This period is not a comment period, but instead allows time for the involved agencies and any interested parties to consider the Final GEIS. While concerned parties, or other agencies, may comment in writing to the Lead Agency on the Final GEIS, the Lead Agency has no obligation to respond to comments on a Final GEIS.

## 2.5 SEQR Process – Chronology To-date

Table 2: SEQR Chronology

ACTION / ACTIVITY	DATE INITIATED*	DATE COMPLETED
Coordinated Review / Lead Agency Solicitation	September 26, 2019	October 23, 2019
ILDC determined that a Draft GEIS would be prepared and issued a Positive Declaration	-	October 23, 2019
ILDC conducted a Public Scoping Meeting		December 17, 2019
Final Scoping Document	January 6, 2020	-
ILDC accepted the Draft GEIS as adequate for public and agency review and comment	-	May 27, 2020
Notice of Completion of Draft GEIS published in ENB	June 10, 2020	-
Public Comment Period	June 10, 2020	July 9, 2020
Public Hearing	June 29, 2020	-
Final GEIS issued by ILDC	-	T.B.D.
Notice of Completion of Final GEIS published in the Environmental Notice Bulletin	-	T.B.D.
Findings Statement filed by Lead Agency	-	T.B.D.

## 2.6 Subsequent Permitting Actions

Subsequent to completion of the GEIS and issuance of Findings, advancement of utility and road development and build-out of the individual lots will be subject to various permits and approvals by various State and Local agencies. They may include, but not be limited to:

- Water
  - Public Water Line Extensions: Erie County Health Department, Erie County Water Authority and City of Lackawanna (work within ROW).
  - Services to Lots: Erie County Health Department, Erie County Water Authority (backflow preventer) and City of Lackawanna (work within ROW).
- Sewer
  - Public Sewer Extensions: Erie County Department of Environmental and Planning and City of Lackawanna (work within ROW).
  - Erie County Department of Environment & Planning.

- **City of Lackawanna:**
  - Site Plan Review, Special Use Permit (if necessary) and Minor Subdivision (if Necessary)
  - Flood Development Permits
  - LWRP/Coastal Consistency Review
- Erie County Department of Environment and Planning: Section 239M Referral
- State Department of Environmental Conservation:
  - State Pollutant Discharge Elimination System (SPDES) General Permit / Stormwater Pollution Prevention Plans (SWPPP)
  - State Air Permit/Air Facility Registration (as necessary for various manufacturing facilities)
  - Review for Compliance with Remedial Action Work Plan
- Empire State Development Corporation Shovel Ready Certification (for Advanced Manufacturing Park)

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## 3 Revisions and Corrections to the Draft GEIS

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This Section presents the revisions to the Draft GEIS based on the input gained through the public and agency review and project changes. As determined in Section 1.4, since the SEQR public hearing on the Draft GEIS, there have been no substantial design changes to the Infrastructure Master Plan.

### 3.1 Revisions to the Draft GEIS

#### 3.1.1 Executive Summary

- Page ES-5: In the first paragraph under Transportation, add the following sentences after the first sentence:  
*“The TIS was revised to address input from the New York State Department of Transportation (NYSDOT). The TIS for the Project is now compromised of the original TIS (May 2019) and its Addendum (September 2020).”*
  
- Page ES-5: Replace the last sentence and options in the first paragraph under Transportation as follows:
  - *“The following options are suggested to improve the buildout levels of service at study intersections:*
    - *Transportation demand management techniques can be used to reduce the number of vehicle trips generated by the development during the peak hours.*
    - *Consider adding a third southbound lane on NY Route 5 as possible solution.*
    - *The addition of designated left turn and right turn lanes at the Ridge Road / SB NY Route 5 Ramp intersection would likely improve the proposed levels of service.*
    - *The addition of a 200-foot southbound right turn (deceleration) lane at Madison Avenue would likely improve the proposed levels of service.”*



### 3.1.2 Section 3.8 – Transportation

- Section 3.8.1.5 Existing Vehicular Networks and Traffic:
  - Page 3-46: Replace the first paragraph, as follows:  
*“A Traffic Impact Study (TIS) for the Project was completed by Watts Architecture & Engineering in 2019 and updated with an addendum in September 2020, to evaluate the existing local vehicular transportation system and to assess potential impacts the Project could cause on local traffic. The TIS (original and addendum are attached as Appendix F to the Draft GEIS.”*
  - Page 3-47: Replace Table 9: Existing - AM & PM Peak Hour LOS Analysis with the following table:

Intersection	Approach				Intersection LOS
	EB	WB	NB	SB	
Madison Avenue/NY Route 5 – AM Peak	-	C	A	A	A
Madison Avenue/NY Route 5 – PM Peak	-	D	A	E	E
Dona Street/NY Route 5 – AM Peak	-	C	A	A	A
Dona Street/NY Route 5 – PM Peak	-	C	A	E	E
Odell Street/NY Route 5 – AM Peak	-	C	A	A	A
Odell Street/NY Route 5 – PM Peak	-	C	A	D	D
Ridge Road/Fuhrmann Drive – AM Peak	A	A	-	A	A
Ridge Road/Fuhrmann Drive – PM Peak	A	B	-	A	B
Ridge Road/SB NY Rte 5 Ramp – AM Peak	A	A	-	A	A
Ridge Road/SB NY Rte 5 Ramp – PM Peak	A	A	-	D	D
Ridge Road/NY Rte 5 Ramps – AM Peak	A	A	A	-	A
Ridge Road/NY Rte 5 Ramps – PM Peak	A	A	B	-	B

- Page 3-47: Replace the last paragraph with the following text:
  - *“The TIS results indicate that during existing peak AM hours, there are no significant delays for the analyzed intersections. Each intersection operates at LOS A for all AM peak hours. During peak PM hours, significant amounts of southbound traffic resulted in “D” or “E” LOS at three intersections. The difference in LOS between the AM and PM peak hours can be attributable to*



*the fact that there are three (3) through lanes in the northbound direction, but only two (2) in the southbound direction, despite the fact that the PM southbound peak hour volumes are roughly equivalent to the northbound AM peak hour volumes.”*

- Section 3.8.2.4 Impacts to Vehicular Networks and Traffic
  - Page 3-48: Add the following sentence as the third sentence:  
*“GBNRTC Traffic Demand Model showed a negative (-0.4%) traffic growth along this corridor of NYS Route 5 in the project area.”*
  - Page 3-48: replace the first paragraph of this section to read as follows:  
*“The aforementioned street intersections were analyzed for the full development of the Project Site. Since full development will take many years, 2039 was utilized as the year for full Project build-out. Additionally, an average annual traffic growth rate of 0.0% was used to calculate future growth. Future traffic impact analyses also included a southbound right turn lane on NYS Route 5 at Dona Street (which is currently under construction), an exclusive northbound left turn only lane at the three intersections along NYS Route 5 (re-striping of existing lane), and the addition of a new third southbound lane on NYS Route 5. The addition of a new southbound lane to NYS Route 5 was added to analyze it as a potential mitigation. Table 10: Future - AM & PM Peak Hour LOS Analysis, displays the calculated full development LOSs within the vicinity of the Project. Note that impacts of adding a third southbound lane to NYS Route 5 are only reflected in the PM peak hour calculations).”*

- Page 3-49: Replace Table 10: Future - AM & PM Peak Hour LOS Analysis with the following:

Intersection	Approach				Intersection LOS
	EB	WB	NB	SB	
Madison Avenue/NY Route 5 – AM Peak	C	C	B	A	B
Madison Avenue/NY Route 5 – PM Peak	C	C	A	D	C
Dona Street/NY Route 5 – AM Peak	C	C	B	A	B
Dona Street/NY Route 5 – PM Peak	D	F	A	E	D
Odell Street/NY Route 5 – AM Peak	D	E	A	A	A
Odell Street/NY Route 5 – PM Peak	E	D	A	C	D
Ridge Road/Fuhrmann Drive – AM Peak	A	B	-	A	B
Ridge Road/Fuhrmann Drive – PM Peak	A	B	-	A	B
Ridge Road/SB NY Rte 5 Ramp – AM Peak	B	B	-	B	B
Ridge Road/SB NY Rte 5 Ramp – PM Peak	B	B	-	F	F
Ridge Road/NY Rte 5 Ramps – AM Peak	A	A	B	-	B
Ridge Road/NY Rte 5 Ramps – PM Peak	A	A	B	-	C

Traffic analysis results are theoretical and based on mathematical equations and computer representations of those answers. Field observations may not substantiate these values.

- Page 3-49: Replace the last paragraph in this section as follows:
  - *“The AM LOS under the full development of the corridor is predicted to operate at an overall LOS of D. The PM LOS under the same development, including the addition of a third southbound lane on NYS Route 5, is predicted to operate at an overall LOS D.”*
- Section 3.8.3 Mitigation of Impacts
  - Page 3-49: Replace the first two paragraphs of Section 3.8.3 (including bullets) as follows:
 

*“As identified above, LOS values within the vicinity of the Project, after full redevelopment, are anticipated to be in line with the existing LOS values for both the AM and PM peak hours.*

*The following options are likely to improve the levels of service at the Project intersections and may be required as necessary during review of future build-out of the individual development lots as determined by the NYSDOT:*

- *Transportation demand management techniques can be used to reduce the number of vehicle trips generated by the development during the peak hours. Some of these include:*
  - *Mandate transit usage*
  - *Provide subsidies or other incentives for employees not to drive to work themselves.*
  - *Encourage carpooling/vanpooling.*
  - *Provide access to company fleet vehicles or car-share vehicles for employees who do not drive to work.*
  - *Modify work schedules (flextime, four-day work weeks, etc.)*
- *Consider adding a third southbound lane on NY Route 5 as a possible solution.*
- *The addition of designated left turn and right turn lanes at the Ridge Road / SB NY Route 5 Ramp intersection; and*
- *The addition of a 200-foot southbound right turn (deceleration) lane at Madison Avenue.*

### **3.1.3 Section 3.9 – Public Services and Utilities**

- Page 3-50: Amend the sentence in the first paragraph to read as follows: *“Additional details on water, sewer, natural gas and electric utility services proposed for the Project are detailed in the Engineers Report found in Appendix A of the Draft GEIS and presented on Figure 9, which is a new drawing is included in the body of the Draft GEIS.”*

### **3.1.4 Section 5.3 – Thresholds for Development of the Project Site**

- Section 5.3.3 Transportation Thresholds.
  - Amend third bullet to read as follows:  
*“ - Any proposal that would cause a LOS of F at any other intersection in the development area will require proposed mitigation measures as identified in a site-specific traffic study that includes all intersections with an anticipated increase of more than 100 vehicles in a peak hour.*

## 3.2 Revisions to Draft GEIS Appendix F- Traffic Impact Study

The majority of revisions to the Draft GEIS are related to the revisions made to the Traffic Impact Study for the Bethlehem Steel Redevelopment Area, May 2019 (TIS), which is Appendix F of the Draft GEIS. During the review of the Draft GEIS, the New York State Department of Transportation (NYSDOT) commented on the TIS. As a result the TIS was subsequently revised in order to address the input from the NYSDOT. The TIS for the Project now is comprised of both the original TIS (May 2019) and its Addendum (September 2020). The combined TIS is provided in Appendix C.

The following changes, as they relate to traffic are made to the TIS:

- Page 4: Replace Section D – Traffic Projections with the following:

*D. TRAFFIC PROJECTIONS (2020)*

*a. Growth Rate*

*GBNRTC Traffic Demand Model showed a negative (-0.4%) traffic growth along this corridor of NYS Route 5 in the project area. Therefore a zero (0.0%) traffic growth was used to develop the background traffic excepted at the full site buildout (2039).*

*b. Trip Generations*

*The vehicle trip generation was based on the project lot data in the DGEIS. The Institute of Transportation Engineers “Trip Generation Manual, 10th Edition” was used to estimate the traffic to be generated by the redeveloped area. Vehicle trip generation was estimated based on the assumed building gross floor area to be placed on the parcels to be developed, using the Average Rate values. These estimated trips were then applied to the analyzed intersection during the appropriate time period. Table 2 summarizes the trip generations for the analysis:*

- Page 5: Replace Sheet Number C-2 with Figure 4 (Sheet Number C-2A).
- Page 6:
  - Replace Table 2 with updated 2020 Addendum Table 2 and replace the following text:
    - *The Manual provides an approximate relationship between building size and trips generated based on studies conducted at facilities across the United States. The proposed development is deemed to be within the national average for Industrial Parks. The average trip generation rate listed in the Manual is*

*deemed suitable for the Bethlehem Steel Redevelopment Area. Therefore, the average number of trip ends listed in the Manual, for both AM and PM peak hours, is approximately 0.4 per 1000 square feet of gross floor area.*

- Replace Section c. – Trip Assignment with the following:
  - *Once generated, these new trips were assigned to the appropriate arriving and/or departing direction of the analyzed intersections during the AM and PM peak hour. (See Table 3 below.) Trip assignments for the proposed developments were considered to be 50/50 split between northbound and southbound based on engineering judgment.*
  - Replace Table 3 with updated 2020 Addendum Table 3.

- Page 7: Replace Section E – LOS Analysis with the following:

*E. LOS ANALYSIS (2020)*

*The level of service analysis was completed using Synchro by Trafficware. Synchro is a macroscopic traffic analysis software that supports the methodologies put forth in the Highway Capacity Manual. This software is often used by state and local governments for traffic analysis.*

*The existing LOS analysis is based on traffic counts taken on May 24, 2017 and August 7, 2018. Individual AM and PM peak hours were determined for each intersection in the study.*

*The AM and PM peak hours analyzed are:*

- *NY Route 5 / Madison Avenue Intersection*
  - *AM Peak Hour – 7:00 – 8:00 am*
  - *PM Peak Hour – 4:30 – 5:30 pm*
- *NY Route 5 / Dona Street Intersection*
  - *AM Peak Hour – 7:15 – 8:15 am*
  - *PM Peak Hour – 4:30 – 5:30 pm*
- *NY Route 5 / Odell Street Intersection*
  - *AM Peak Hour – 7:15 – 8:15 am*
  - *PM Peak Hour – 4:30 – 5:30 pm*

*The existing level of service analysis was completed assuming no changes to signal timings and phasing. There was an analysis completed for the background traffic, existing traffic with the normal traffic growth to 2039. Then the estimated traffic generated for the development*

*was added to the background traffic and another analysis was performed. The future analyses included the Dona Street extension that was recently constructed along with a NY Route 5 southbound right turn lane at Dona Street. In addition, the existing center turn lane will be striped for an exclusive, left turn only at these three intersections on NY Route 5. The following figures illustrate the existing traffic, background traffic, generated traffic and combined traffic.*

- Pages 8 through 15: Replace Figures with 2020 Addendum Revised Figures.
- Page 16:
  - Replace Section a. Existing LOS with the following text:
    - *The existing AM LOS analysis shows no significant concern areas for the analyzed intersections. Each intersection operates at LOS A for all AM peak hours.*
    - *Traffic counts taken during the existing PM peak hour were reversed from the AM hour. Significant amounts of southbound traffic resulted in an 'E' LOS. As described above in the methodology section of the report, a LOS E represents operations at or near capacity (an unstable level). Vehicles are operating with the minimum spacing for maintaining uniform flow. Disruptions cannot be dissipated readily, often causing queues to form and service to deteriorate to LOS F. The difference in LOS between the AM and PM peak hours can be attributable to the fact that there are three (3) through lanes in the northbound direction, but only two (2) in the southbound direction, despite the fact that the PM southbound peak hour volumes are roughly equivalent to the northbound AM peak hour volumes.*
    - *See the tables after the recommendations that summarizes the existing AM and PM peak hour LOS for each approach and the intersection compared with the LOS for the background traffic and the LOS at full redevelopment:*
  - Replace Section b. LOS after redevelopment with the following text:
    - *The studied intersections were analyzed for the full redevelopment of the Bethlehem Steel Redevelopment Area (+/- 170 acres). The LOS analysis was completed for the year of 2039. Since full redevelopment at the site will take many years, 2039 is an estimated horizon year for full project buildout.*

- *For the full redevelopment, 12 parcels were created as shown in the Site Plan. Traffic lot/traffic allocation is as shown in Table 3 above and in further detail in Appendix C. Our analysis shows the all intersections still operating with a minimal change to the LOS compared to the existing LOS during the AM peak hour.*
- *The PM peak hour analysis shows that the three NY Route 5 intersection's capacity will be exceeded (LOS F). Given the existing LOS on for SB NY Route 5 (LOS E) any disruption to the traffic stream can cause a breakdown in the traffic flow (LOS F).*
- *Given the scope of the redevelopment it is reasonable to assume there would be a fair amount of the existing traffic on NY Route 5 that would be diverted into the development. This would then reduce the added traffic to the intersections after redevelopment.*

- Page 17: Replace Section F – Recommendations with the following text:

*F. Recommendations (2020)*

*The NY Route 5 intersections that were included in the study currently operate in an acceptable LOS during the AM peak hour. Although, these same intersections during the PM peak hour the southbound traffic operate at a LOS E.*

*The following options are suggested to improve the buildout levels of service at study intersections:*

- *Transportation demand management techniques can be used to reduce the number of vehicle trips generated by the development during the peak hours. Some of these include:*
  - *Mandate transit usage*
  - *Provide subsidies or other incentives for employees not to drive to work themselves.*
  - *Encourage carpooling/vanpooling.*
  - *Provide access to company fleet vehicles or car-share vehicles for employees who do not drive to work.*
  - *Modify work schedules (flextime, four-day work weeks, etc.)*
- *Consider adding a third southbound lane on NY Route 5 as possible solution.*

- *The addition of designated left turn and right turn lanes at the Ridge Road / SB NY Route 5 Ramp intersection would likely improve the proposed levels of service.*
- *The addition of a 200-foot southbound right turn (deceleration) lane at Madison Avenue would likely improve the proposed levels of service.*
  
- Delete “Appendix C”
  
- Replace “Appendix D”, “Appendix E” and “Appendix F” with the 2020 Addendum Appendix D, Appendix E and Appendix F.



## 4 Substantive Public Comments and Lead Agency Responses

This section presents the written and verbal comments on the Draft GEIS, received by the Lead Agency (ILDC) during the public comment period from June 10, 2020 through July 9, 2020. Oral comments were received during the SEQR Public Hearing held by ILDC on June 29, 2020. The public hearing was held via a virtual meeting in conformance to the on-going Covid-19 pandemic protocols to avoid in-person public meetings while still facilitating virtual or on-line public participation. Written comments were made by electronic mail to the ILDC via a comment submission form available on through the Project website.

Responses to comments are presented following each substantive comment. Because the Draft GEIS focuses on impacts associated with the Infrastructure Master Plan for Advanced Manufacturing Park and does not consider the whole former BSC steel plant property, ILDC’s responses address in detail only those substantive comments related directly to the Project activities and Project site.

The written comments are summarized in this section. For presentation purposes some comments have been excerpted in all or part from their original correspondence in order to focus on concerns relevant to the Project. However, responses were prepared after considering the entire comment. Copies of complete comments, as submitted to the ILDC, are provide in Appendix B – Public and Agency Written Comments.

New York State Department of Environment Conservation (NYSDEC) Region 9 and New York State Historic Preservation Office (SHPO) confirmed in writing their receipt of Public Hearing Notice and availability of Draft GEIS, but provided no substantive comments.

<b>4.1 Edward Rutkowski, P.E., New York State Department of Transportation, Region 5, July 9, 2020</b>	
<b>Comment:</b>	<i>NYS DOT concurs with the Erie County ILDC acting as the Lead Agency.</i>
<b>Response:</b>	<i>Comment Acknowledged. No further response required.</i>
<b>Comment:</b>	<i>“The Traffic Impact Study (TIS) uses a 1% traffic growth rate for the study area. NYS DOT found the GBNRTC Travel Demand Model to show a negative (-0.4%)</i>

	<i>traffic growth for this corridor of NY Route 5. Also, the NYSDOT Traffic Data Forecaster (TDF) tool indicates negative traffic growth rate. The analyses should be revised, and it would be appropriate to use 0% traffic growth rate for this study.”</i>
<b>Response:</b>	The 1% traffic growth rate was determined by using historic traffic count data along the NYS Route 5 corridor. The revised analysis prepared for the TIS Addendum (see Appendix C) revised the background traffic projections using the 0% traffic growth rate.
<b>Comment:</b>	<i>“The Traffic Impact Study (TIS) should include an accident analysis.”</i>
<b>Response:</b>	Since the TIS was developed to accompany a Generic Environmental Impact Statement for a site with undetermined future development, we did not feel an accident analysis was warranted at this time.
<b>Comment:</b>	<i>“The Traffic Impact Study (TIS) should expand the number of intersections to the extent impacted by the site generated traffic rather than just the intersections on NY Route 5 with roads entering the Industrial Park.”</i>
<b>Response:</b>	Since the TIS was developed to accompany a Generic Environmental Impact Statement for a site with undetermined future development, we did not feel the need to add additional intersections.
<b>Comment:</b>	<i>“The TIS summarizes the LOS for existing conditions and for the build condition with a 3rd (additional) southbound travel lane. Traffic studies for proposed developments impacting NYSDOT highways, we require that the study analyzes and include summaries of LOS at existing conditions, background condition, build condition and build condition with proposed highway mitigation. This shows the impact of the additional site generated traffic as compared to the background traffic and then how the mitigation improves any negative impacts that the site generated had on the highways.”</i>
<b>Response:</b>	The TIS Addendum provides a LOS table for the revised analysis for the existing conditions, background conditions, build condition and build conditions with proposed highway mitigation, if mitigation is necessary.

<b>Comment:</b>	<i>“As stated above the TIS analyzes the LOS with an additional southbound travel lane on NY Route 5, however, there is no discussion on the feasibility of constructing it. Also, the TIS recommends left and right turn lanes at Ridge Rd/SB NY Route 5 and a southbound right turn lane at Madison Avenue as potential mitigation. Any highway improvements that are needed to mitigate the development traffic would be the responsibility of the applicant and/or developer to construct and fund those improvements.”</i>
<b>Response:</b>	Building a third southbound lane will require ROW acquisitions, likely utility relocations, bridge widening or replacement, etc. We believe that it is feasible but discussing these specific topics was beyond the scope of the TIS for a generic EIS, until development patterns begin to emerge from the build out of the individual lots.

<b>4.2 Naomi Feltz, June 25, 2020</b>	
<b>Comment:</b>	<i>“Please add more trails, more trees, more recreational greenspace. This *could be* valuable beautiful land if the space was usable. Make it wild, make it green. Running paths, dirt paths, walking paths, trees, shade, green space!”</i>
<b>Response:</b>	The Project site, a former industrial facility, was not acquired for open space purposes. A key Project goal is for the State, County, National Fuel and National Grid to cooperate in redeveloping a portion of the former steel into an industrial park for advanced manufacturing in order to stimulate economic development and create jobs. In accordance with the City of Lackawanna zoning, the Master Plan limits lot coverage to 80% in the BRA-Medium Industrial District and 75% in the Light Industrial District, leaving 48.8 acres open area which cannot be developed. An additional 11.5 acres are set aside for the existing and proposed continuation of the Bethlehem Shoreline Trail, a public accessible recreation path.

<b>4.3 Gabriel Ferber, June 28, 2020</b>	
<b>Comment:</b>	<i>“Buffalo should follow the lead of Chicago, Philadelphia and Baltimore to develop waterfront for public recreation. Commercial Development repeats the mistakes of the past.”</i>

<p><b>Response:</b></p>	<p>The Project Site does not include any waterfront. It is inland of the Lake Erie shoreline by approximately 4,500 feet. The Project site only includes the first approximately 1,200 to 1,300 feet west of the NYS Route 5/Hamburg Turnpike right-of-way.</p> <p>Smokes Creek traverses the Project Site within an approximately 150-foot wide corridor. It is noted that the Smokes Creek corridor is not included as part of the ILDC's Advanced Manufacturing Park project area.</p> <p>The creek lies within the City of Lackawanna Smokes Creek Overlay zoning district within which permitted uses are limited to passive recreation uses, such as trails, overlooks, and picnic shelters; access for water-related activities; and stormwater detention/retention.</p>
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**4.4 Raymond Graf, June 22, 2020**

<p><b>Comment:</b></p>	<p><i>“Given the nature of the property, two suggestions for the area would be:</i></p> <p><i>1: A large indoor track facility is in high demand for the area and there is no adequate facility currently in Section 6. With many collegiate programs too, it would be highly used (look at how much use Oceanbreeze gets in Staten Island and SPIRE in Ohio). Buffalo could be the one that bridges the distance. Some plans for the building have already been developed and if it could be paired with 5 and 8k cross country trails, it could become a fitness destination across many seasons. With the current infrastructure in place, transportation would be largely effective. Then the natural aspect of the XC course, with the parking and pavement of the facility could help mitigate any environmental issues. If the bike path could be connected, it would be a shining example of revitalization and would draw so many people to the area.</i></p> <p><i>2: A racing track on the lake, like a NASCAR facility, would also mitigate the environmental issues with the amount of concrete/blacktop/etc. and with proximity to Canada, it could also recruit international travel. With infrastructure in place already, travel would be functional.”</i></p>
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<b>Response:</b>	<p>The Project site, a former industrial facility, was not acquired for recreational purposes. A key Project goal is for the State, County, National Fuel and National Grid to cooperate in redeveloping a portion of the former steel into an industrial park for advanced manufacturing. Project intent is to stimulate economic development and create jobs. In addition, the City of Lackawanna zoning does not include recreation facilities in either the BRA-LI or BRA-MI zoning districts. Neither proposed uses would meet the intent of the zoning or Master Plan.</p> <p>In addition, there are restrictions in on the reuse of remediated property that exclude uses such as "... other facilities primarily used for multiple numbers of persons under the age of 18 years...".</p>
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<b>4.5 Christopher Barnum, June 19, 2020</b>	
<b>Comment:</b>	<i>"We have lost so much water access due to poor planning of industrial and roadway projects. Clean the property of Bethlehem Steel and provide park and beach access to the water."</i>
<b>Response:</b>	The Project site does not include any waterfront. It is inland of the Lake Erie shoreline by approximately 4,500 feet. The Project site only includes the first approximately 1,200 to 1,300 feet west of the NYS Route 5/Hamburg Turnpike right-of-way.

<b>4.6 Tim Leahy, June 28, 2020</b>	
<b>Comment:</b>	<p><i>"With the Bethlehem project:</i></p> <ol style="list-style-type: none"> <li><i>1. Have a boat launch for all Erie County residents.</i></li> <li><i>2. Have a park with picnic areas.</i></li> <li><i>3. Restroom facilities.</i></li> <li><i>4. A food area, something casual, like a hotdog stand with a diverse menu.</i></li> <li><i>5. An amphitheater like the one on Camp Rd. in Hamburg."</i></li> </ol>
<b>Response:</b>	The Project site does not include any waterfront, it is inland of the Lake Erie shoreline by approximately 4,500 feet. The Project site only includes the first approximately 1,200 to 1,300 feet west of the NYS Route 5/Hamburg Turnpike right-of-way.

	<p>The Project site, a former industrial facility, was not acquired for open space purposes. A key Project goal is for the State, County, National Fuel and National Grid to cooperate to redevelop a portion of the former steel into an industrial park for advanced manufacturing in order to stimulate economic development and create jobs.</p>
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<p><b>4.7 James Balcarczyk, June 30, 2020</b></p>	
<p><b>Comment:</b></p>	<p><i>“...To the project: as a 71-year-old lifelong Lackawanna resident, retired from ECDEP, I have some knowledge of the existing facilities that will be treating the sanitary wastewater from the Bethlehem project.</i></p> <ol style="list-style-type: none"> <li><i>1. The treatment plant was built in the 1970's with minimal upgrades since then. In fact some parts of the facility have been out-of-service for some time. During extreme weather events, the treatment plant exceeds capacity. Will the existing pump station(s) and treatment plant be able to properly treat the additional discharges From the Project?</i></li> <li><i>2. I do not believe that, without major investment, the Wastewater treatment plant will remain effective for much longer.</i></li> <li><i>3. Is the storm water from the former Bethlehem Steel property safe to discharge to Lake Erie or Smokes Creek without additional treatment?</i></li> <li><i>4. Have you looked at alternative facilities for treatment? For example the Southtowns treatment plant near Woodlawn Beach.”</i></li> </ol>
<p><b>Response:</b></p>	<ol style="list-style-type: none"> <li>1. Per written correspondence from the Erie County Department of Environment &amp; Planning (see Appendix C of the Engineer's Report in the DGEIS) the existing Lackawanna Water Resource Recovery Facility has an available capacity of 2 million gallons per day (MGD) and the upstream sanitary sewers have an available capacity of 1 MGD. At full build-out, the proposed development will generate an Average Daily sanitary sewage flow of 0.65 MGD which is less than the available capacity.</li> <li>2. The effectiveness and condition of the Lackawanna Water Resource Recovery Facility is the responsibility of the Erie County Department of Environment &amp; Planning and as noted above they were consulted concerning this project and advised that the treatment plant has a 2 MGD available treatment capacity.</li> </ol>

	<p>3. As noted in the Engineer’s Report (page 11), storm water runoff from the site will be treated as prescribed in the <i>New York State Stormwater Management Design Manual</i>. Current storm water runoff from the site discharges into Smokes Creek or Lake Erie with no pretreatment.</p> <p>4. In performing the preliminary design, we contacted the Erie County Department of Environment &amp; Planning concerning the locations to connect the proposed sanitary sewers into the existing sanitary sewer system. The locations indicated in the preliminary design are the result of this consultation. The local sewers are tributary to the Lackawanna Water Resource Recovery Facility. Since the existing sanitary sewer system and treatment facility have adequate available capacity, we did not explore the option to send our flows to a different treatment facility. Connection to the Southtowns Advanced Wastewater Treatment facility would require the construction of a new pump station and the installation of several miles of force main sewer and would be cost prohibitive to this development project.</p>
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<b>4.8 Richard Hellam, June 30, 2020</b>	
<b>Comment:</b>	<i>“Please continue to give strong consideration to protecting and promoting the use of the slip at the former steel plant as a fully functional seaport for foreign-flagged and US Domestic cargo vessel operations. Both the Great Lakes shipping industry and the international bulk/project cargo industries have the proven potential to contribute tremendously to the local economy and infrastructure, by means of supporting local and regional ancillary trades. I do hope any such redevelopment plan of the site continues to give this industry strong consideration”</i>
<b>Response:</b>	The ILDC does not own the Gateway Trade Center/Lackawanna Ship Canal and it is not part of the Project Site. The canal and port facility is privately owned and continues to operate for bulk cargo storage and transfer facility for both imported and exported goods.

<b>4.9 Phillip Stokes, June 29, 2020 (Public Hearing)</b>	
<b>Verbal Comment:</b>	<ol style="list-style-type: none"> <li>1. <i>How does Master Plan deal with contaminants?</i></li> <li>2. <i>Bike Trail is (a positive) way to make public aware of (the redevelopment).</i></li> </ol>
<b>Response:</b>	<ol style="list-style-type: none"> <li>1. The 244-acre Project Site is comprised of 23 individual NYSDEC-designated Brownfield Cleanup Program (BCP) parcels. Activities to study and remediate the Project Site were begun under the BCP prior to the ILDC’s acquisition of the Project Site. Participation in the BCP lays out a series of actions that must be completed prior to obtaining a Certificate of Completion (COC), which must be followed prior to future redevelopment of the site. Currently 9 parcels have their COCs, while COC’s for another 13 are pending the installation of a final cover consisting of a minimum of 1 foot of clean material. And one BCP site is still in process. By issuing the COCs, the New York State Department of Environmental Conservation has cleared those parcels as being ready for re-development.                       In order to maintain the Certificate of Completions issued under the BCP program, anywhere the existing minimum 1-foot of clean cover (soil or other material) is breached, penetrated, or temporarily removed, and if any underlying remaining impacted soils are disturbed, the Site Excavation Work Plan must be followed, in order to minimize potential exposures. To minimize future disturbance of remaining contaminated soils, clean utility corridors will be installed along the roadways within the 100-foot ROW for water, sewer, drainage, and private utility lines.</li> <li>2. Comment acknowledged. The Bike path is a continuation of the Shoreline trail and is proposed to continue south on the Project Site, and in the future beyond to Woodlawn Beach.</li> </ol>

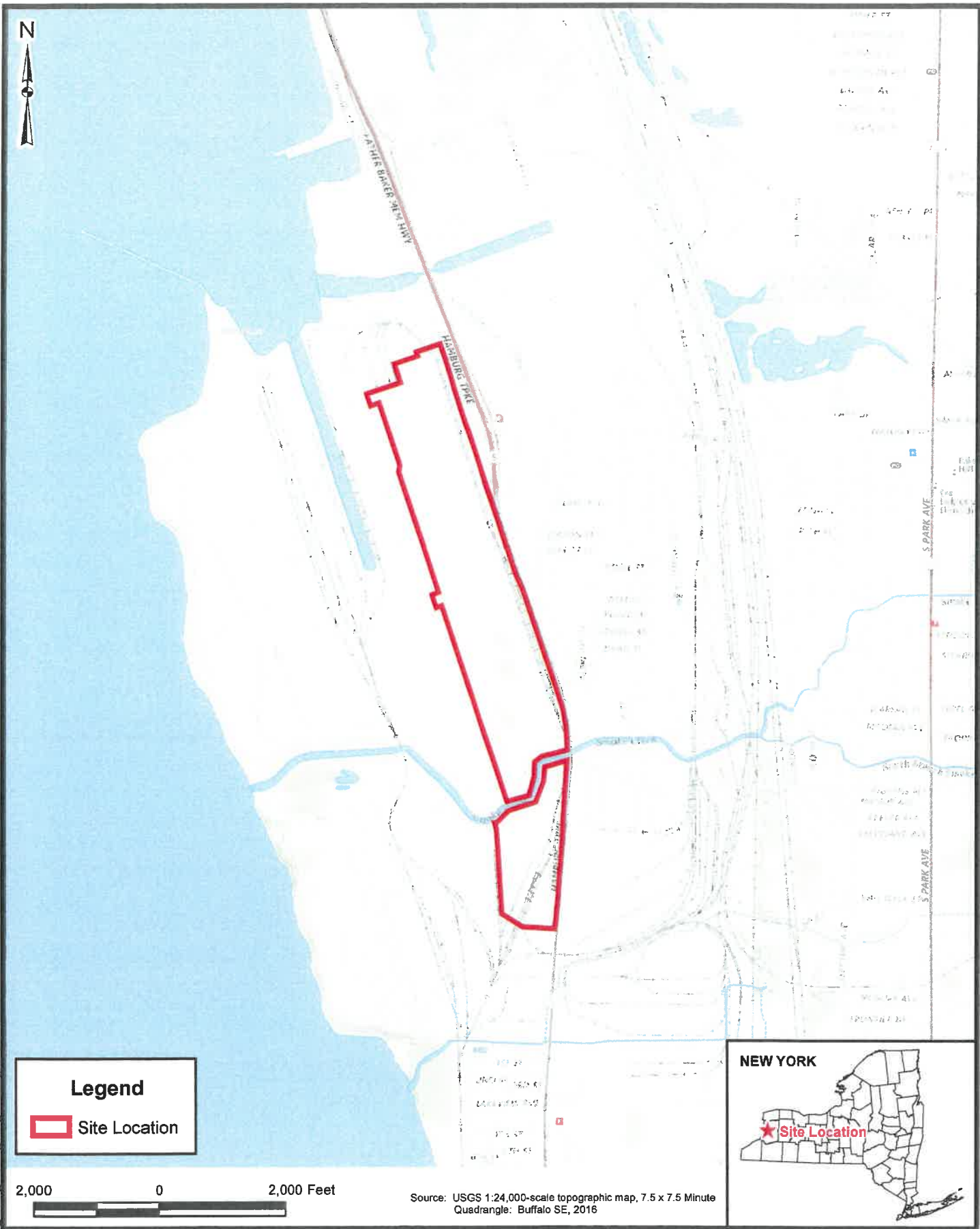
<b>4.10 Shawn Creighton(sp.?), June 29, 2020 (Public Hearing)</b>	
<b>Verbal Comment:</b>	<ol style="list-style-type: none"> <li>1. <i>Wording should be included to use local subcontractors, and</i></li> <li>2. <i>pay prevailing wage rates.</i></li> </ol>



<b>Response:</b>	<ol style="list-style-type: none"> <li>1. Any private development projects on the individual lots that seek assistance from the Erie County Industrial Development Agency are required to use local labor as part of any IDA incentives</li> <li>2. The ILDC pays prevailing wage rates on public works projects at the Project Site.</li> </ol>
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<b>4.11 Christopher Pawenski, June 29, 2020 (Public Hearing)</b>	
<i>Verbal Comment:</i>	<p><i>Acknowledged the importance of the ECIDA and City of Lackawanna's cooperation in this project, as well as the City's tax rate re-structuring.</i></p> <p><i>Is the north-south road really needed?</i></p>
<b>Response:</b>	<p>The interior road running north-south is shown on the Infrastructure Master Plan links the recently constructed Dona Street Extension to the proposed Odell Street Extension. Between the proposed Odell Street Extension and the Proposed Ridge Road Street Extension, the north-south road is shown as a potential “future” road, which would only be constructed if need to serve a variant of the lot configuration.</p>

J:\Projects\60568845\_BSR\MP\900\_CAD\_GIS\920\_GISMAPS\EDGE\IS\01 SITE LOCATION.mxd 2/10/2020



ADVANCED MANUFACTURING PARK - INFRASTRUCTURE MASTER PLAN  
 BUFFALO AND ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION  
 LACKAWANNA, NEW YORK  
 SITE LOCATION MAP

FIGURE 1



**PROJECT**  
 Advanced Manufacturing Park - Infrastructure Master Plan

**OWNER**  
 Buffalo and Erie County Industrial Land Development Corporation  
 95 Perry Street, Suite 403  
 Buffalo, N.Y. 14203

**CONSULTANT**  
 AECOM  
 257 West Genesee Street, Suite 400  
 Buffalo, N.Y. 14202  
 716-855-5500 tel 716-855-2545 fax  
 www.aecom.com

**REGISTRATION**



LOT DATA			
LOT NO.	GROSS AREA (ACRES)	DEVELOPABLE AREA** (ACRES)	EXISTING ZONING
1	41.7	33.4	BRA-MI
2	9.9	7.4	BRA-LI
3	13.1	10.5	BRA-MI
3A	5.8	4.6	BRA-MI
4	24.1	19.3	BRA-MI
4A	10.0	8.0	BRA-MI
5	8.5	6.4	BRA-LI
6	9.1	6.8	BRA-LI
7	55.6	51.9	BRA-LI & BRA-MI
8	10.8	8.6	BRA-MI
9	6.5	4.9	BRA-LI
10	11.7	8.5	BRA-LI & BRA-MI
SUBTOTAL	217.7	170.3	
EXISTING ROAD RIGHT OF WAY (DONNA STREET)	2.4	N/A	N/A
PROPOSED ROAD RIGHT OF WAY	10.7	N/A	N/A
SHORELINE TRAIL (EXISTING AND FUTURE) & TRAIL HEAD PARKING	11.5	N/A	N/A
GREENSPACE	1.4	N/A	N/A
OUTPARCELS	1.4	N/A	N/A
TOTAL	245.1**	170.3	

\* NOT INCLUDING PROPOSED STREET R.O.W. AND SHORELINE TRAIL EASEMENT  
 \*\* GROSS AREA FOR LOTS 2, 3, 7, 8 & 9 INCLUDE RIGHT OF WAY FOR FUTURE PUBLIC STREETS (10.7 ACRES)

**LEGEND:**

- ILDC PROPERTY BOUNDARY
- PROPOSED LOT BOUNDARY
- PROPOSED LOT NUMBER
- ZONING BOUNDARY
- EXISTING PRIVATE ROAD
- RAILROAD TRACK
- 50' WIDE EASEMENT BETWEEN SHORELINE TRAIL
- PROPOSED 1 ACRE TRAIL HEAD AREA
- POTENTIAL EXTENSION OF SHORELINE TRAIL EASEMENT
- WATER BODY
- UTILITY SUBSTATION
- PROPOSED PUBLIC STREET RIGHT-OF-WAY (100')
- POTENTIAL FUTURE PUBLIC STREET RIGHT-OF-WAY
- UNDEVELOPED / GREENSPACE
- EXISTING TRAFFIC SIGNAL
- POTENTIAL FUTURE BRIDGE

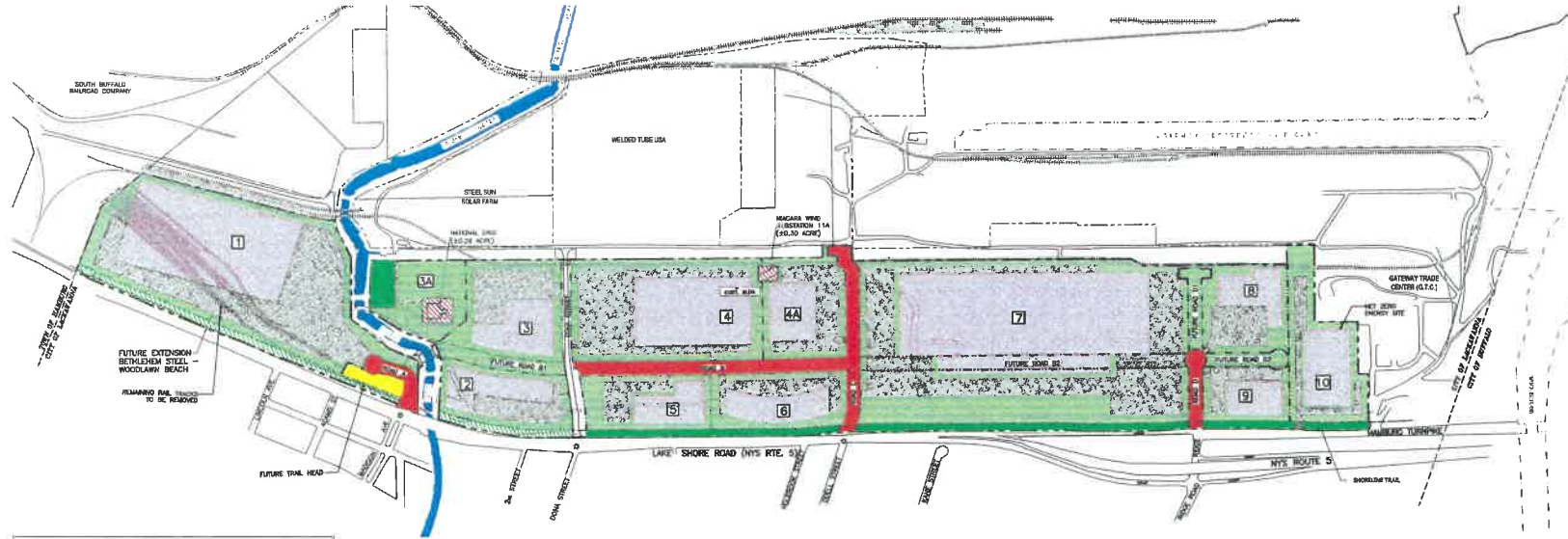
**ISSUE/REVISION**

NO.	DATE	DESCRIPTION

**FIGURE 2**  
 PROJECT NUMBER  
 60558845  
 SHEET TITLE  
 INFRASTRUCTURE MASTER PLAN (WITH AERIAL)  
 DRAFT OCTOBER 2019  
 SHEET NUMBER  
 C-2



IR	DATE	DESCRIPTION



LOT DATA			
LOT NO.	GROSS AREA (ACRES)	DEVELOPABLE AREA* (ACRES)	EXISTING ZONING
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4A	10.0	8.0	BRA-MI
5	8.5	8.4	BRA-LI
6	9.1	6.8	BRA-LI
7	68.6	51.8	BRA-LI & BRA-MI
8	10.8	8.6	BRA-MI
9	6.5	4.9	BRA-LI
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<b>SUBTOTAL</b>	<b>217.7</b>	<b>170.3</b>	
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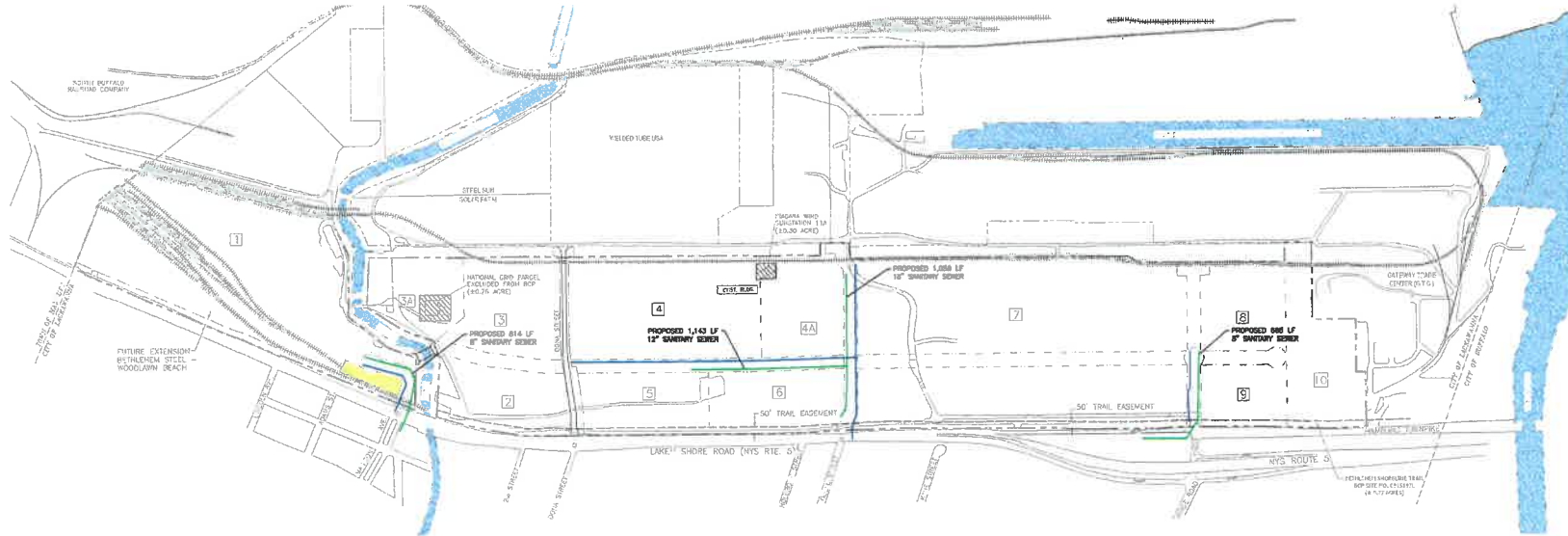
ZONING REQUIREMENTS	BRA-LI	BRA-MI
MINIMUM LOT SIZE	5 ACRES; OR 50 ACRES FOR PUD	8 ACRES, OR 50 ACRES FOR PUD
MINIMUM LOT FRONTAGE	300 FEET	500 FEET
MAXIMUM BUILDING HEIGHT	36 FEET OR 3 STORIES	80 FEET
MINIMUM FRONT YARD	30 FEET / 50-FOOT SETBACK REQUIRED FROM NYS ROUTE 5 AND HAMBURG TURNPIKE ROW	50 FEET
MINIMUM SIDE YARD	25 FEET	50 FEET
MINIMUM REAR YARD	NA	50 FEET
MINIMUM BUFFER TO SMOKE'S CREEK GREENWAY CORRIDOR OVERLAY DISTRICT BOUNDARY	50 FEET	50 FEET
MINIMUM BUILDING COVERAGE	15%	18%
MAXIMUM LOT COVERAGE (INCLUDING PARKING)	75%	80%
MINIMUM LANDSCAPING COVERAGE	25%	20%

**LEGEND:**

- BUILDING
- PAVEMENT/PARKING AREAS
- GREENSPACE/LANDSCAPED AREAS
- ILDC PROPERTY BOUNDARY
- PROPOSED LOT BOUNDARY
- PROPOSED LOT NUMBER
- ZONING BOUNDARY
- EXISTING PRIVATE ROAD
- RAILROAD TRACK
- 50' WIDE EASEMENT BETWEEN SHORELINE TRAIL
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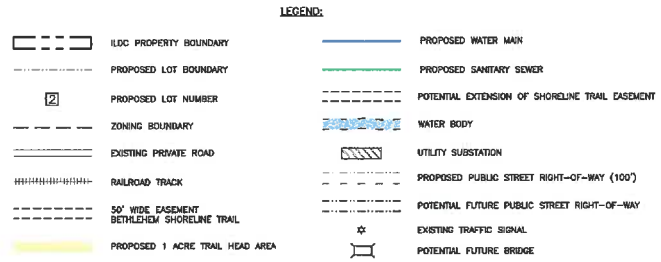






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**REGISTRATION**

**ISSUE/REVISION**

NO.	DATE	DESCRIPTION

**PROJECT NUMBER**  
 605568845

**SHEET TITLE**

**INFRASTRUCTURE MASTER PLAN**  
 DRAFT APRIL 2020

**SHEET NUMBER**  
 C-2D



**ILDC Board of Directors Meetings - 2021**  
**Meeting starts at 1:00 p.m.**

**95 Perry Street**  
**4th Floor ECIDA Vista Room**  
**Buffalo, New York 14203**

Wednesday, January 27<sup>th</sup>

Wednesday, February 24<sup>th</sup>

Wednesday, March 24<sup>th</sup>

Wednesday, April 28<sup>th</sup> (Annual Meeting)

Wednesday, May 26<sup>th</sup>

Wednesday, June 23<sup>rd</sup>

Wednesday, July 28<sup>th</sup>

Wednesday, August 25<sup>th</sup>

Wednesday, September 29<sup>th</sup>

Wednesday, October 27<sup>th</sup>

Wednesday, November 24<sup>th</sup>

Wednesday, December 22<sup>nd</sup>