



Buffalo and Erie County Industrial Land Development Corporation  
Board of Directors Meeting  
January 22, 2020  
@ 1:00 p.m.  
95 Perry Street  
4<sup>th</sup> Floor Vista Room  
Buffalo, New York 14203

**1.0 Call to Order**

**2.0 Approval of Minutes**

2.1 Approval of the December 18, 2019 Meeting Minutes of the Board of Directors (Pages 2-3)

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

3.1 Approval of GEIS Project Scoping Document (Action Item) (Pages 4-24)

**4.0 Adjournment - Next Meeting February 26, 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:** December 18, 2019, at the Erie County Industrial Development Agency, 95 Perry Street, 5<sup>th</sup> Floor Conference Room, Buffalo, New York 14203
- PRESENT:** Denise Abbott, Richard Lipsitz, Jr., Hon. Mark C. Poloncarz and Maria Whyte
- EXCUSED:** Hon. April Baskin, Hon. Byron W. Brown, and Hon. Howard Johnson
- OTHERS PRESENT:** Steve Weathers, Chief Executive Officer; John Cappellino, Executive Vice President; Atiqa Abidi, Assistant Treasurer, and Karen M. Fiala, Assistant Treasurer/Secretary
- GUESTS:** Andrew Federick, Erie County Senior Economic Development Specialist; and Robert G. Murray, Esq., General Counsel/Harris Beach PLLC

There being a quorum present at 1:00 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 Ms. Whyte and seconded by Ms. Abbott, and upon a vote thereof to so approve, the October 23, 2019 minutes of the Board of Directors of the Buffalo and Erie County Industrial Land Development Corporation (“ILDC”) meeting were unanimously approved.

**REPORTS / ACTION ITEMS / INFORMATION ITEMS**

Financial Report. Ms. Abidi presented the November 2019 financial report. Ms. Abidi noted that the balance sheet indicates the ILDC finished the month with total assets of \$8.9 million and net assets of \$6.8 million. There were no significant changes to the balance sheet accounts during the month. The monthly income statement shows minimal income and expenses of \$19,300, plus net special project costs of \$1,300, for a net loss of \$20,500 in November. The year-to-date income statement shows total revenues of \$192,000, expenses of \$93,000, and net

special project grants of \$87,000, for net income of \$186,000 so far in 2019. Mr. Poloncarz directed that the report be received and filed.

Approval of Resolution to Sign/Accept Customer Agreement with National Grid for Early Stage Planning and Engineering regarding WNY Agribusiness Park. Mr. Weathers reviewed this resolution with the members. Ms. Whyte moved and Mr. Lipsitz seconded to approve of the National Grid Resolution. Mr. Poloncarz then called for the vote and the following resolution was unanimously approved:

RESOLUTION OF THE BUFFALO AND ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION ("ILDC") AUTHORIZING THE ILDC TO ENTER INTO A CERTAIN STRATEGIC ECONOMIC DEVELOPMENT PROGRAM GRANT AWARD AGREEMENT WITH NATIONAL GRID TO SUPPORT EARLY-STAGE PLANNING FOR THE REDEVELOPMENT OF THE FORMER ANGOLA AIRPORT SITE IN THE TOWN OF EVANS

Approval of Resolution to Sign/Accept Contract with Professional Consultants/Service Provider to Prepare a Master Plan for the Bethlehem Steel-Woodlawn Beach Shoreline Trail. Mr. Weathers reviewed this resolution with the members. Mr. Lipsitz moved and Ms. Whyte seconded to approve of the Bethlehem Steel-Woodlawn Beach Shoreline Trail resolution. Mr. Poloncarz then called for the vote and the following resolution was unanimously approved:

RESOLUTION OF THE BUFFALO AND ERIE COUNTY INDUSTRIAL LAND DEVELOPMENT CORPORATION ("ILDC") AUTHORIZING THE ILDC TO ENTER INTO A CONTRACT WITH LABELLA ASSOCIATES FOR THE PROVISION OF PLANNING AND CONCEPTUAL DESIGN SERVICES FOR A CERTAIN BETHLEHEM STEEL-WOODLAWN BEACH SHORELINE TRAIL PROJECT

There being no further business to discuss, Mr. Poloncarz adjourned the meeting at 1:08 p.m.

Dated: December 18, 2019

---

Karen M. Fiala, Secretary

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

**FINAL SCOPING DOCUMENT RESOLUTION**

*(BETHLEHEM STEEL SITE)*

A regular meeting of the Buffalo and Erie County Industrial Land Development Corporation was convened on January 22, 2020, at 12:00 p.m.

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

**RESOLUTION OF THE BUFFALO AND ERIE COUNTY INDUSTRIAL  
LAND DEVELOPMENT CORPORATION (“ILDC”) ADOPTING THE FINAL  
SCOPING DOCUMENT WITH RESPECT TO THE ADVANCED  
MANUFACTURING PARK INFRASTRUCTURE MASTER PLAN**

WHEREAS, the ILDC is authorized and empowered by Section 1411 of the Not-for-Profit Corporation Law of the State of New York, as amended (the “NFP Law”), to relieve and reduce unemployment, promote and provide for additional and maximum employment, better and maintain job opportunities in Erie County (the “County”) and lessen the burdens of government and act in the public interest; and

WHEREAS, the ILDC has commenced an initiative to redevelop an approximately 240 acre parcel of real property located within the former Bethlehem Steel Site in Lackawanna, New York, for commercial and industrial purposes to ultimately promote and encourage job creation and new investment for the benefit of the residents of Erie County (the “ILDC Advanced Manufacturing Park Infrastructure Master Plan” or “Project”); and

WHEREAS, on October 23, 2019, pursuant to the New York State Environmental Quality Review Act and its implementing regulations at 6 N.Y.C.R.R. Part 617 (collectively referred to as “SEQRA”), the ILDC determined that the Project is a Type I SEQRA Action, designated itself as Lead Agency for the purpose of conducting a coordinated review of the Project, issued a positive declaration pursuant to SEQRA requiring the preparation of a Draft Generic Environmental Impact Statement (“DGEIS”) for the Project, and directed that both a Draft Scoping Document for the DGEIS be made available for public review and be provided to all applicable involved agencies and a public scoping meeting be conducted at which such public input on the Draft Scoping Document could be provided; and

WHEREAS, the ILDC provided the Draft Scoping Document for the DGEIS to all involved agencies and interested agencies on November 21, 2019 for review and comment, established a written comment period for the Draft Scoping Document from November 21, 2019 through December 31, 2019, and notified said agencies and the public of the public scoping session scheduled for December 17, 2019; and

WHEREAS, the ILDC also published a notice of the scheduled public scoping session in the New York State Department of Environmental Conservation’s Environmental News Bulletin and in the local newspaper; and

WHEREAS, the public scoping session was held on December 17, 2019 at 6:00 p.m. at the St. Anthony's Church, 306 Ingham Avenue, Lackawanna, New York and written comments were accepted through December 31, 2019; and

WHEREAS, the ILDC has taken the comments received from the public and the involved and interested agencies and prepared a Final Scoping Document pursuant to 6 N.Y.C.R.R. § 617.8(f) of the SEQRA regulations, a copy of which is attached hereto as Exhibit A.

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 ratifies and confirms all actions taken to date by ILDC and ILDC staff with respect to SEQRA compliance as so related to the development and consideration of the ILDC Advanced Manufacturing Park Infrastructure Master Plan.

Section 2. Pursuant to 6 N.Y.C.R.R. § 617.8 of the SEQRA regulations, the ILDC hereby adopts the Final Scoping Document as attached hereto as Exhibit A on which the DGEIS will be based.

Section 3. The ILDC directs that the Final Scoping Document for the DGEIS be provided to all involved agencies and interested agencies and to any person who has expressed an interest in writing to obtain same, and further directs that notice of this resolution shall be filed and circulated to the extent required by any applicable ordinance, statute or regulation.

Section 4. The ILDC hereby directs its environmental consultants and counsel to prepare the DGEIS in accordance with the Final Scoping Document as attached hereto.

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

Exhibit A

**Final Scoping Document**

**STATE ENVIRONMENTAL QUALITY REVIEW ACT  
DRAFT SCOPING DOCUMENT**

**FOR THE PREPARATION OF A  
FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT**

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

**LEAD AGENCY:**

**Buffalo and Erie County Industrial Land Development Corporation  
95 Perry Street, Suite 403  
Buffalo, NY 14203**

**LEAD AGENCY CONTACT:**

**John Cappellino,  
Executive Vice President  
95 Perry Street, Suite 403  
Buffalo, NY 14203  
(716) 856-6525**

**PREPARED BY:**

**AECOM  
257 West Genesee St., Suite 400  
Buffalo, NY 14202**

**January 6, 2020**

## INTRODUCTION

The Buffalo and Erie County Industrial Land Development Corporation (the ILDC), acting as Lead Agency pursuant to the State Environmental Quality Review Act (SEQRA) and its implementing regulations (6 NYCRR Part 617), has prepared this Final Scoping Document for the Draft Generic Environmental Impact Statement (DGEIS) to assess the adoption and implementation of an Infrastructure Master Plan to guide the development of the ILDC Advanced Manufacturing Park on a portion of the former Bethlehem Steel Corporation (BSC) steel plant, along NYS Route 5 in Lackawanna, NY (the Master Plan or Project). Adoption and implementation of the Infrastructure Master Plan constitute the “Project” or “Proposed Action”, which is subject to SEQRA. See attached Site Location Map and Master Plan.

The Master Plan is being prepared in accordance with the guidelines established by New York State Empire State Development (ESD) in order to submit an application for Shovel Ready Certification under the Build Now New York Program. It is anticipated that the Project will result in the installation of public streets, water, sewer, and private utilities in support of future redevelopment of the site with a mix of commercial, business, and light and medium density industrial facilities. Thresholds and standards for future redevelopment will be established to help ensure that private development and State or local municipal decisions proceed in accordance with the Master Plan.

The purpose of this Final Scoping Document is to define the environmental issues that will be addressed in the DGEIS. This document is intended to provide the initial identification of potentially significant adverse environmental impacts that may result from the adoption and implementation of the Master Plan. The Final Scoping Document identifies appropriate mitigation measures, where applicable. It is also intended to eliminate from consideration in the DGEIS any potential impacts that are irrelevant or non-significant to the Master Plan.

## SEQR / DGEIS PROCESS

Prior to completing the environmental impact review process for the Project, the ILDC will conduct a series of procedural steps in accordance with SEQRA and its implementing regulations.

The ILDC completed Part 1 of the Full Environmental Assessment Form (EAF) and classified the Project as a Type 1 Action under SEQRA. The Project is considered a Type 1 action because it is anticipated to involve: sale of 100 or more contiguous acres of land by a State or local agency; the physical alteration of 10 acres of land or more; parking for over 500 vehicles in a city having a population of 150,000 persons or less; and facilities with more than 100,000 square feet in a city having a population of 150,000 persons or less. Other Type 1 activities may also be identified as applicable to the Project.

Upon completion of the EAF Part 1 and classification of the Project as a Type 1 action, the ILDC circulated a Lead Agency solicitation letter, dated September 26, 2019, proposing to seek SEQR Lead Agency status for the adoption and implementation of the Master Plan, and indicated its intent to conduct a Coordinated Review by requesting the consent from the other potentially Involved Agencies for the ILDC to serve as SEQRA Lead Agency. The letter also indicated that the ILDC intends to issue a Positive Declaration and initiate public scoping by holding a Public Scoping Meeting.

On October 23, 2019, upon receiving no objections from potentially Involved Agencies, the ILDC assumed the designation as Lead Agency for the Project. The ILDC has determined that a DGEIS will be prepared. A notice for the public scoping meeting was distributed to the Involved Agencies and



published in the Environmental Notice Bulletin and local newspaper. A public scoping session was held on December 17, 2019 and written comments accepted through December 31, 2019. Following public review and coordination with other Involved Agencies, the ILDC has prepared and will adopt this Final Scoping Document on which the DGEIS will be based.

#### INVOLVED AGENCIES

There is one Involved Agency that will be required to approve and/or adopt the Master Plan include:

- Buffalo and Erie County Industrial Land Development Corporation (ILDC).

Potential future involved public agencies and interested parties that may have a permit, review, approval and/or funding role, or other interest in the implementation of the Master Plan include:

- City of Lackawanna Planning and Development Board,
- City of Lackawanna Zoning Board of Appeals,
- City of Lackawanna Department of Public Works,
- Erie County Industrial Development Agency,
- Erie County Department of Environment and Planning,
- Erie County Sewer District No. 6,
- Erie County Water Authority,
- Erie County Department of Public Works,
- New York State Department of Environmental Conservation,
- New York State Department of Transportation,
- New York Empire State Development,
- New York State Office of Parks, Recreation and Historic Preservation – State Historic Preservation Office,
- United States Army Corps of Engineers, and
- United States Fish and Wildlife Service.

#### RATIONALE FOR USING A GENERIC ENVIRONMENTAL IMPACT STATEMENT

The ILDC has determined that a Generic EIS (GEIS) rather than a project-specific conventional EIS is particularly well suited for the Project because:

- Implementation of the Master Plan is one of a number of separate actions (including buildout of infrastructure and sale of development lots) in the advanced manufacturing park which, if considered singly, may have minor impacts, but if considered together may have significant impacts;
- The Master Plan is one action in a sequence of actions, contemplated by the ILDC related to the redevelopment of the site.
- The Master Plan is part of the larger program or plan for the site having wide application to a range of future alternative projects.

A GEIS is a broader, more general version of a conventional EIS and may be used to assess the environmental impacts of an entire program or plan that has a wide application such as significant changes to existing land use plans or comprehensive resource management plans (in this case, the Master Plan). Generic EISs and their findings should set forth specific conditions for any subsequent review and SEQR compliance. This may include thresholds and criteria for triggering the preparation of Supplemental EISs to reflect specific significant impacts that cannot be adequately addressed or

analyzed in the GEIS at this time. Preparation of a GEIS will provide the opportunity to refine the Master Plan and include agency and public involvement through the long-term implementation of the Master Plan. The GEIS will also provide long-term coverage for phasing of future implementation of the Master Plan, as well as any individual projects anticipated to make up the buildout of the Master Plan.

Preparation of a GEIS also has many advantages for streamlining the redevelopment process for specific brownfield sites. These advantages include:

- The GEIS will set forth specific conditions or criteria under which future actions will be undertaken or approved, no further SEQRA compliance may be required when specific projects are proposed, provided their impacts were anticipated and assessed in the GEIS. This advantage has the potential to significantly streamline and reduce the time that may be required to complete redevelopment projects.
- By preparing a GEIS, the ILDC will be in a strong position to avoid potential challenges for having not analyzed potential environmental impacts associated with Master Plan buildout.
- By preparing a GEIS, the ILDC may learn important information discovered during the GEIS process that will benefit the site planning and redevelopment process.

#### DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action subject to SEQR is the preparation, adoption and implementation of an Infrastructure Master Plan to guide the development of the ILDC Advanced Manufacturing Park on a portion of the former BSC steel plant (the Project). The Project site is located on approximately 240 acres at 2303 Hamburg Turnpike (west side) in Lackawanna, New York, 14218. It is anticipated that the Project will result in the installation of public streets, water, sewer, and stormwater management facilities, and private utilities in support of the future subdivision and redevelopment of the site for a mix of commercial offices, research and development facilities, warehousing and distribution facilities, advanced manufacturing, light and medium density industrial manufacturing, assembly and fabrication facilities, and public utility facilities consistent with the land uses allowed in the Bethlehem Redevelopment Area - Light and Medium Industry zoning districts.

The Master Plan provides twelve separate development lots ranging in size from 5.8 acres to 67.3 acres. The lots are arranged along a proposed street layout (approximately 4,025 linear feet of new roadway) that provides access to four new public streets. An additional 4,925 linear feet of streets are identified to accommodate further subdivision and to provide interconnection between the four access points to NYS Route 5. The Master Plan is intended to be flexible in its implementation in order to meet varying market demands in terms of lot size, access and infrastructure, and to be capable of being built-out in phases.

Approximately 150 acres are currently owned by the ILDC. An additional 90 acres is pending ILDC acquisition from Tecumseh Redevelopment Inc. (Tecumseh). The 240-acre Project site consists of a portion of the larger tax map parcel (approximately 1,100-acres) identified as SBL 141.11-1-48-13 and a portion of SBL 141.11-1-48.11, which are part of the larger former BSC property.

The site is located along the west side of NYS Route 5, south and east of the Port of Buffalo, and north and east of the remaining BSC property and Lake Erie. Other surrounding land uses near the site include: vacant lands within the former BSC property, the NDS Lumber Transfer Facility, a solar farm (Steel Sun) and the Welded Tube pipe manufacturing facility. Located east of NYS Route 5 are buildings

from the former BSC plant, which are currently used for miscellaneous industrial operations and storage, and the “First Ward” residential area.

This project site is generally rectangular in shape, approximately 5,500 feet long in the north-south direction and averages 1,500 feet deep in the east-west direction. The generally flat, slag-filled site is partially vegetated with natural grasses, shrubs and poplar trees typical of a primary shrub-young forest ecosystem. A portion of Smokes Creek forms a corridor that separates the project site into 2 sections. The corridor is approximately 150 feet wide and approximately 1,700 feet long and is owned by Tecumseh. Although all but one of the former BSC buildings within the ILDC project area have been removed, foundations are prevalent sub-surface features. An active rail yard is located at the south end and the spur that once paralleled NYS Route 5, has been relocated along the west boundary of the project site.

Being part of the larger former BSC property, which at one time was approximately 1,100 acres, the Project site is part of one of the larger brownfield sites in upstate New York. Approximately 400 acres of the former BSC property are now available for near-term redevelopment. These 400 acres are in the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) and are eligible for tax credits. For participation in the BCP, the former BSC property was divided into smaller “parcels” for investigation and remedial activities. These BCP “parcels” have not been subdivided or filed with the Erie County Clerk as separate tax map parcels. The ILDC has purchased from Tecumseh the majority of the two assemblages known as Business Park I (11 sub-parcels) and Business Park II (12 sub-parcels), all of which have been entered into the BCP. Certificates of Completion (COC) have been issued for nine of the sub-parcels. Sub-parcels that do not yet have a COC have remedial work remaining, which will be completed with the application of one foot of clean cover. Deed restrictions and environmental easements in the form of an institutional control (IC) (non-physical means of enforcing a restriction on the property to limit human or environmental exposure) are in place on the project site.

The Master Plan will guide redevelopment of the approximately 240-acre ILDC property, including planning for infrastructure improvements and subdivision of industrial lots for sale and future development. The Master Plan builds upon and compliments previous and on-going public projects including: relocation of the rail lines to the west edge of the properties, construction of a new public street extending west from Route 5 at Dona Street, extension of public water and sewer services, construction of an extension of the Shoreline Trail from approximately the City of Buffalo line south to the Dona Street; and planning and design efforts for the Net Zero Energy site on 12.4 acres at the north end of the ILDC property.

#### **PUBLIC PARTICIPATION**

Public comments on this draft scoping document were received at a public scoping session held on December 17, 2019. Substantive comments were accepted through December 31, 2019 and considered in finalizing this Final Scoping Document.

#### **REVIEWS AND APPROVALS**

The ILDC has the authority to adopt the Master Plan. It is anticipated that specific projects implementing the Master Plan will require actions, reviews, and/or approvals by various City of Lackawanna and New York State agencies. Depending on the land use, the City has Site Plan Review and Special Use Permit authority over future private development proposals on the individual lots the ILDC

sells. The City of Lackawanna will also have to conduct a Coastal Zone Consistency Review for compliance with the City’s Local Waterfront Revitalization Program (LWRP). The NYSDEC will continue to have review and approval jurisdiction over any proposed environmental investigations, remediation action work plans, and future land uses on remediated sites.

#### ANTICIPATED CONTENT OF THE DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT

This section of the scoping document describes the anticipated content of the Draft GEIS and the anticipated methodology and resources for the environmental assessment. The Draft GEIS will be prepared in general accordance with 6 NYCRR Part 617.10 and, as such, will present a more general set of inventory and analyses than a conventional, project-specific EIS. The DGEIS will describe the Proposed Action (the Project) and will include assessments of specific anticipated impacts commensurate to the level of detail known at this time. The analyses will be based on conceptual Master Plan prepared to-date. Where no detail is available, the DGEIS will present qualitative estimations of impacts and identify the level of analysis that will be required at the time individual development projects are proposed.

The general framework of the DGEIS will:

- 1) characterize the existing conditions in the Project area;
- 2) identify and assess (comparing to existing conditions) the potential change and environmental impacts that are likely to occur under implementation and buildout of the conceptual Master Plan;
- 3) identify possible mitigation measures to avoid or reduce the identified significant adverse environmental impacts; and
- 4) address a range of alternatives to the implementation of the Master Plan (the preferred alternative).

As applicable, the DGEIS will be organized in accordance with 6 NYCRR Part 617.9(b) as follows:

##### DGEIS Title Page

The title page will state that the document is a Draft Generic Environmental Impact Statement, and will include the descriptive title of the project, the location of the project, the name, address and telephone number of the Lead Agency and its contact person, contact information for preparer(s) of the DGEIS, the date of acceptance of the DGEIS by the Lead Agency, and the date by which comments must be submitted.

##### Table of Contents

The DGEIS will include a Table of Contents including listings of tables, figures, maps and appendices, as applicable. See Attached.

##### Executive Summary

The executive summary will provide a concise overview of the DGEIS. It will include a brief description of the Project, a description of the existing environmental setting, identification of significant beneficial and adverse impacts, a description of proposed mitigation measures, an evaluation of alternatives considered, and a listing of anticipated permits, approvals and funding (as applicable to infrastructure

improvements and to the future buildout of individual lots within the proposed industrial park subdivision).

### Section 1.0 Introduction - Project Description

This section will provide a description of the Action subject to SEQR (the Project). Section 1 will include a concise description of the Master Plan and its purpose, and public need and benefits. The project description will include the relationship of the study area to the community and region; acreage in the Project area; and the number and size of proposed development lots, brownfield status, anticipated new uses and businesses, and proposed public infrastructure improvements (water, sewer and stormwater). A Location Map that shows the location of the Project area in relation to the City will be included in this section along with a set of plan sheets that make up the infrastructure Master Plan with road and infrastructure details.

### Section 2.0 SEQR Process

This section will describe the process under that the ILDC is following to document its environmental assessment in accordance with SEQRA. SEQRA requires all state, regional, and local government agencies to consider potential environmental impacts equally with social and economic factors during preliminary stages of proposed development actions. The Lead Agency and other Involved Agencies must assess the environmental significance of all actions they have discretion to approve, fund, or directly undertake. This section will document the ILDC's classification of the Project as a Type 1 Action and identify review agencies (Lead Agency, Involved Agencies and Interested Parties). Applicable permits and/or approvals anticipated for the adoption and/or implementation of the Infrastructure Master Plan will also be identified in this portion of the DGEIS. The rationale for utilizing a Generic EIS and anticipated public review period for the Draft and Final GEIS's will be provided.

### Section 3.0 Environmental Setting, Potential Impacts and Mitigation Measures

This section of the DGEIS will describe the Project area's existing natural resources and environmental features and current conditions including: dryland natural resources and open space; soil and topographic resources; surface waters and groundwater resources; wetlands; flood plains; wildlife habitats; visual resources; and local, state, or federally designated resources. It will present the baseline setting of the physical area and community within which the Project will be developed. This section will identify and assess the Project's potential significant impacts and identify potential mitigation measures for significant adverse impacts. The information sources used to assess each potential impact will be identified and summarized in the DGEIS.

It is anticipated that the DGEIS will address each of the following substantive resource topics:

- Topographic Setting, Geology and Soils,
- Brownfield Clean Up Program Status and Hazardous Materials,
- Water Resources and Floodplains,
- Ecological Resources,
- Land Use and Zoning,
- Cultural Resources (Historic and Archeological),
- Visual and Aesthetic Resources,
- Transportation and Traffic,

- Infrastructure and Utilities,
- Socioeconomic and demographic trends,
- Noise, and
- Air

Section 3 of the DGEIS will utilize existing information from past studies, and plans, including, but not limited to:

- Site Visits,
- Brownfield Cleanup Program Documentation,
- Real Estate Analysis Draft Report, January 2019,
- Phase IA Archaeological Survey, February 2019,
- Traffic Impact Study, May 2019,
- City of Lackawanna Comprehensive Plan Update, 2017,
- Chapter 230 of the City of Lackawanna Municipal Code – Zoning, amended through June 2018,
- City of Lackawanna First Ward Brownfield Opportunity Area Step 3, 2018, and
- City of Lackawanna Local Waterfront Revitalization Program, Preliminary Draft, 2018

### 3.1 Topographic Setting, Geology and Soils

Construction of the road and public utility infrastructure and development of the individual development lots will involve excavation and removal of large quantities of soil for building foundations. Issues to be addressed in the DGEIS include impacts to existing topography, geology and soils, and future uses of land resources. Mitigation measures to eliminate or reduce impacts to these resources will also be discussed in the DGEIS; these may include but are not be limited to clean utility corridors and compliance with NYSDEC-approved Site Management Plans (SMP).

Numerous surface and subsurface site investigations which included borings, groundwater monitoring and geotechnical analyses have been previously conducted to determine the subsurface conditions beneath the Project site. This data will be used to assess potential surface and subsurface impacts from the Project. Any surface and subsurface investigations reviewed will be referenced and summarized in the appropriate section of the DGEIS. New investigations are not proposed for the Master Plan but may be proposed as site-specific development plans are proposed.

### 3.2 Brownfield Clean Up Status / Hazardous Materials

This section of the DGEIS will describe the status of the property's participation (under various owners) in the New York State Brownfield Cleanup Program (BCP). As described above in the Description of the Proposed Action, the former BSC site has been subject of extensive environmental investigations. The Project area is comprised of two BCP site designations:

- Tecumseh Phase I Business Park ("Phase I") - NYSDEC Site No. C915197) - 102 acres
- Tecumseh Phase II Business Park ("Phase II") - NYSDEC Site No. C915198) – 143 acres

The Phase I and Phase II BCP Sites have been remediated or are slated for remediation in accordance with their respective Brownfield Cleanup Agreements (BCAs). In order to stimulate sale and redevelopment of more manageable-sized properties, NYSDEC agreed to divide the Phase I BCP Site into 11 sub-parcels and Phase II BCP Site into 12 sub-parcels. Certificates of Completion (COC)

have been issued for some of the Phase I and Phase II sites. Sites that do not yet have a COC are pending placement of the one-foot of clean cover.

Mitigation measures include adherence to the environmental deed restriction on the entire 1,100-acre Tecumseh property that prohibits the use of groundwater, as well as a common Environmental Easement that was executed and recorded for the Phase I and Phase II BCP Sites. The Environmental Easement:

- restricts land use to commercial or industrial applications (consistent with local zoning);
- restricts the use of Project site groundwater for either potable or non-potable purposes without treatment; and,
- prevents future exposure to any remaining contamination.

The Environmental Easement also requires compliance with the Site Management Plan (SMP) and all Institutional Controls (ICs) and engineering controls (ECs). Additional mitigation measures may include construction of “clean corridors” for the installation of streets and utilities. Therefore, it is anticipated that any potential impacts to human health resulting from implementation of the Master Plan will be mitigated.

### 3.3 Water Resources

This section of the DGEIS will assess the Project’s potential impact on the existing surface water and groundwater resources and discuss possible mitigation measures, if applicable.

Surface Waters: There are no surface waters within the Project area. However, the ILDC-controlled Project site is bisected by a portion of Smokes Creek within a 150-foot wide a corridor owned by Tecumseh. Also located just off-site to the west are the North Return Water Trench and South Return Water Trench, which drain into Smokes Creek and ultimately to Lake Erie. This section of the DGEIS will address the value of the creek as a tributary to Lake Erie and identify potential off-site impacts from the Project.

During construction, the potential exists for silt-laden stormwater drainage from disturbed areas to enter adjacent surface waters. The DGEIS will assess the potential impacts and identify measures, as needed, to ensure that discharges from the on-site stormwater management infrastructure maintain the water quality standards of the receiving water(s). Stormwater management measures, including implementation of best management practices in accordance with a preliminary Stormwater Pollution Prevention Plan, will be discussed as a possible mitigation measure. Additional mitigation measures to be described may include both on-site and off-site buffers.

Ground Water: As part of the BCP activities, several subsurface site investigations, which included borings and installation of groundwater monitoring wells, have been completed on the Project site. This information can be referenced as a baseline for groundwater depth and quality. Potential impacts the Project may have on groundwater resources will be identified and discussed in the DGEIS. Mitigation measures based on the Site Management Plans will be identified in the DGEIS to minimize potential impacts to groundwater resources in the Project area.

Floodplains: This section of the DGEIS will address how the current and proposed floodplain mapping will affect redevelopment of the Project area. It is understood that a portion of the

Project site overlaps with the NYSDEC Lackawanna Flood Protection Project on Smokes Creek. Constraints on future development and permitting requirements will be identified in the DGEIS.

The Project is located in the area covered by the FEMA Flood Insurance Rate Map Community Panel 3602470001B, having an effective date of July 2, 1980. The 1980 effective map indicates that the majority of the Project area is located in Zone C (“areas of minimal flooding”) and, therefore, not subject to permitting. The southern portion of the Project area is located in Zone B (“...areas subject to 100-year flooding with average depths less than 1 foot...”), where floodplain development permits are required from the City. However, FEMA has new preliminary floodplain mapping that has not yet gone into effect. The latest mapping indicates the southern portion of the Project area to be located in the 500-year floodplain (0.2% annual chance flood hazard), where permitting will not be required. Like the effective FIRM map, the Smokes Creek corridor is located in the 100-year floodplain (1% Annual chance flood hazard).

The DGEIS will assess impacts on flooding from future industrial development in the 100-year floodplain. Possible mitigation will be implemented through the applicable building standards, as stated in the City of Lackawanna’s Zoning Code relevant to Flood Development Permits.

Wetlands: There are no designated New York State Freshwater Wetlands or U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI)-mapped wetland within ILDC’s Project area. Due to the lack of U.S. Army Corps of Engineers (USACE) and NYSDEC-regulated wetlands onsite and no wetlands have been observed during onsite field investigations, no impacts to wetlands are anticipated and therefore, mitigation is not necessary.

### 3.4 Ecological Resources

This section of the DGEIS will include descriptive narrative and mapping of the vegetation communities within the project site, as identified through field verification and aerial photographs. The Project site, which was once fully developed with the BSC plant facilities, is now dominated by early successional plant communities on fill-covered ground.

Land Cover / Plant Communities/Rare, Threatened and Endangered Species: As development of the subject property proceeds over time, all plant communities within the project area will likely be removed and replaced with buildings, paved areas and other infrastructure, and landscaping. The DGEIS will evaluate land cover to identify existing plant communities and rare, threatened and endangered plant species. Potential impacts will be assessed, and mitigation proposed, as required, to protect significant resources. Any proposed mitigation related to potential impacts to plant communities and significant species will be summarized accordingly in this section of the DGEIS.

North of Smokes Creek, the Project area is mainly comprised of early successional plants, such as horseweed (*Conyza canadensis*), common reed (*Phragmites australis*), goldenrod (*Solidago* sp.), clover (*Trifolium* sp.), rye (*Secale cereale*), crown vetch (*Coronilla varia*), and various species of grass. Closer to NYS Route 5, young stands of big tooth aspen trees (*Populus grandidentata*) and sumac (*Rhus* sp.) are prevalent. Various locations throughout the area are lacking vegetation due to gravel, deteriorated asphalt, or debris piles.

South of Smokes Creek, the Project area is sparsely vegetated with early successional species, such as crown vetch, common wormwood (*Artemisia vulgaris*), big tooth aspen saplings, goldenrod,



milkweed (*Asclepias syriaca*), and grape (*Vitis vinifera*). The southeast corner of the Project Area is dominated by big tooth aspen trees, located within a low-lying area. Species throughout the Project site are typical for previously disturbed locations.

As property development proceeds over time, all plant communities within the Project Area will be removed and replaced with buildings, parking, roads, stormwater management facilities and landscaping. The maximum coverage allowed under current zoning is 80%; the remaining are will be in landscaping.

Rare, Threatened and Endangered Species: The New York Natural Heritage Program (NHP) and the U.S. Fish & Wildlife Service (USFWS) were contacted to determine whether any rare, threatened or endangered species are associated with, or are located adjacent to, the project site. Consultation with USFWS was conducted on September 17, 2018. The federally-threatened Northern long-eared bat (*Myotis septentrionalis*) was identified as potentially occurring throughout Erie County. However, no suitable habitat was observed within the Project area during onsite field investigations on October 3, 2018.

The NHP was consulted to identify rare or state-listed animals or plants, or significant natural communities at the Project area. Correspondence with NHP on October 19, 2018 indicated that NHP has no records of rare or state-listed species or significant natural communities at the Project area. NHP did indicate that within approximately 0.5 miles of the Project area is a state-threatened peregrine falcon (*Falco peregrinus*) nesting location and a significant gull colony. Additionally, the state-threatened lake sturgeon (*Acipenser fulvescens*) and mooneye (*Hiodon tergisus*) are located within nearby Lake Erie.

Other Wildlife Habitat: The DGEIS will identify other wildlife species in the Project area and assess impacts to their habitat, including potential indirect impacts to the existing gull colony and possible mitigation measures. Any proposed mitigation related to potential impacts to other wildlife species will be summarized accordingly in this section of the DGEIS.

### 3.5 Existing Land Use and Zoning

As part of the former BSC's plant facilities, the existing land use within the Project area consists primarily of (currently) undeveloped vacant industrial land. There are private roadways and water and sewer services serving the adjacent industrial uses to the west and north.

This section of the DGEIS will provide a description of the existing and proposed land uses on site, as well as land use and community character within the surrounding areas. The DGEIS will include an assessment of the anticipated changes in land use and community character. Mitigation measures associated with land use and community character, if appropriate, will also be included and are expected to be focused on adherence to the existing zoning.

Open Space and Recreation: It is reasonable to assume that public access along the Smokes Creek is feasible as a part of future redevelopment of the Project area. Therefore, the DGEIS will include an evaluation of the potential for recreational access along the creek in the Project area, including the type, extent and location for access, as well as any regulatory restrictions that may preclude such access.

Several existing documents will support this section, including but not limited to: City of Lackawanna Comprehensive Plan Update, 2017; City of Lackawanna Zoning, amended through June 2018; City of Lackawanna First Ward Brownfield Opportunity Area Step 3, 2018; and City of Lackawanna Local Waterfront Revitalization Program, Preliminary Draft, 2018.

### 3.6 Cultural Resources (Historic and Archeological)

This section of the DGEIS will identify the historic and archeological areas, sites, districts, or structures near the Project area. A Phase IA Archeological Survey was completed for the Master Plan study area in February 2019. The Project site was found to have been previously disturbed by numerous activities including: construction and demolition of the steel plant, construction and removal of rail lines, installation of two electrical substations and aboveground and buried utilities, push piles, and excavations for the removal of contaminated soil/fill/slag during remediation. Based on the results of the Phase IA Archeological Survey, except for building foundations, there is very little to no potential for intact archaeological resources to be located within Project site. Based on their review of the report, the New York State Office of Parks, Recreation and Historic Preservation - State Historic Preservation Office (SHPO) concurred with the report's conclusions. In a letter dated March 15, 2019, the SHPO determined that no historic properties, including archaeological and/or historic resources, will be affected by the Project. Correspondence and mapping will be documented in the DGEIS and the Phase IA study appended. Therefore, significant adverse impacts to historic or archeological resources are not anticipated from the Project and no further assessment or mitigation would be warranted in the DGEIS.

### 3.7 Visual and Aesthetic Impacts

Implementation of the Master Plan may result in changes in the visible landscape that are different from the current conditions and surrounding land uses. This section of the DGEIS will identify and qualitatively assess the Master Plan's potential to change the character or quality of aesthetic resources in and surrounding the Project area. The DGEIS will utilize the latest version of the NYSDEC Program Policy for Assessing and Mitigating Visual Impacts, draft October 30, 2018, as a guide to identifying surrounding aesthetic resources. It is anticipated that a viewshed map will be utilized to identify scenic or aesthetic resources within five miles of the Project site. Implementation of the infrastructure components of the Master Plan is not anticipated to result in significant adverse impacts to aesthetic resources. Because future development of new structures on the lots are not known at this time, potential mitigation will be adherence the City's zoning design guidelines.

### 3.8 Transportation and Traffic

This section of the DGEIS will describe the types of transportation systems (vehicular, rail, navigable waterways, and pedestrian/bicycle accommodations) that serve the Project area. A traffic assessment for the project is being undertaken to establish baseline traffic conditions and to determine the future volume upon full buildout of the project. The size, capacity and condition of transportation services will be discussed including, the internal and external street network, traffic control and access/egress from the project site. Anticipated changes in traffic from future development will be modeled, including a.m. and p.m. peak hour traffic flow, level of service, and potential impacts. It is anticipated that the traffic impact study will identify mitigation measures to

reduce the impact to the existing road network. The Traffic Impact Study (TIS) will be summarized and appended to the DGEIS.

### 3.9 Infrastructure and Utilities

This section of the DGEIS will describe existing public infrastructure (water, sewer, stormwater, etc.) and power utilities that serve the Project site. The DGEIS will quantify how buildout of the Master Plan will impact the demand for potable water, and increase generation of waste water and stormwater. Identification of potential impacts resulting from these changes will be assessed and possible mitigation will be described. Given the conceptual nature of the Master Plan, the impact assessment pertaining to infrastructure and utilities will be limited to location, capacity and order-of-magnitude demand.

Street layout and infrastructure plans will depict right-of-way and street alignments. Sewer, water and stormwater alignments and sizing will also be depicted on the plans. An Engineer's Report will be appended to the DGEIS and summarized in this section. The Engineer's Report will provide a description of existing and proposed public utilities, anticipated demand and capacities.

The new sanitary sewer system will be designed to connect to the location(s) as identified by the Erie County Sewer District as having adequate capacity. The NYSDEC and Erie County Sewer District will also have input on the sewer design during preparation of the GEIS. Impacts related to serving the Project site with potable water will be avoided through design to ECWA standards, including use of backflow protection. The Engineer's Report will be accompanied by an order-of-magnitude cost estimate for public streets and utilities and a phasing plan.

The Master Plan and street and utilities plans have been provided to the City of Lackawanna for review for consistency with current zoning and City engineering standards. In addition, a preliminary Stormwater Pollution Prevention Plan for Compliance with NYSDEC General Permit GP-0-15-002 for Stormwater Discharges from Construction Activities will be appended to the DGEIS and summarized in this section. As a designated MS4 Community, the City will also have input on the preliminary SWPPP during preparation of the GEIS.

### 3.10 Economic Conditions and Market Trends

This section of the DGEIS will include descriptions and analysis of existing market conditions, which when combined with the ILDC's goals for the Master Plan implementation; provide a range of realistic future land uses for the Project site. The real estate analysis will be summarized in the DGEIS and the report appended. The DGEIS will characterize population, socio-economic conditions in the City, County and State. It may also consider the following: income; employment (public and private); types of potential future land uses most appropriate for the area; and a description of anticipated economic benefits and job creation and their impact on the geographic area.

### 3.11 Noise Impacts

Noise generated at and in the vicinity of the Project site currently includes nearby road traffic and on-going operations of surrounding industries and businesses. There also is construction noise from various remediation activities on the remaining Tecumseh-owned properties. Build out of the

individual lots in the advanced manufacturing park may result in an increase in noise on the Project site, which has been essentially vacant for over 25 years.

The Project site is relatively isolated from residential noise receptors. The closest residential area to the Project is opposite NYS Route 5 to the east, in Lackawanna’s “First Ward” neighborhood. This section of the DGEIS will identify surrounding noise receptors and anticipated Project-related sources of noise generation. The assessment of potential noise impacts will be qualitative based on anticipated land uses. It is anticipated that the mix of manufacturing and industrial uses targeted for the Project will be limited to indoor operations, except for shipping and delivery activities. Possible mitigation measures will be described and may include attenuation by distances to sensitive noise receptors, adherence to City Zoning (Chapter 230) and Noise (Chapter 159) regulations. Because the ILDC project is limited to infrastructure planning and creation of development lots, use-specific noise modeling will not be conducted for the DGEIS but may be necessary during review of future development projects.

Noise related to construction (temporary) and operational traffic are anticipated to produce noise levels higher than the existing ambient conditions. This section of the DGEIS will address short-term construction related noise related to the buildout of the industrial park.

### 3.12 Air Impacts

Currently, there are no industrial uses operating on site. According to the City’s Comprehensive Plan, new industrial uses are not anticipated at the Project site that would result in negative adverse impacts to air quality; “... the former heavy industrial activities that impacted air quality in the area no longer exist and air quality has improved. Land use plans for the City do not support the introduction of uses that would adversely impact air quality. Cleaner industrial uses and other uses suited for the waterfront and First Ward areas will not generate contaminants that would contravene existing air quality standards.”

Future build out of the Advanced Manufacturing Park may include State or Federal-regulated air emission sources, which cannot be known until site-specific proposals are received for each individual lot. Consequently, quantitative assessment of potential impacts from air emissions cannot be conducted until future site-specific proposals are received. However, future industrial or manufacturing will have to meet the applicable State and Federal permit standards. Therefore, although detailed assessment cannot be conducted at this time, it is understood that significant adverse impact to air quality will be minimized and mitigated through the State and Federal air permitting process. As the Master Plan is implemented and development lots are built out, it is expected that the applicable standards and/or conditions related to air permit(s) will mitigate potential impacts. Air permitting for future development projects may require: NY State Air Registration, Air Facility Permit, Federal Clean Air Act Title IV or Title V Permit. The DGEIS will utilize the NYSDEC Guide for Assessing Energy Use and Greenhouse Gas Emissions in Environmental Impact Statements as applicable.

### 3.13 Coastal Zone Consistency

Implementation of the Master Plan and subsequent buildout of individual development projects will require a determination of coastal zone consistency from the NYS DOS. This section of the DGEIS will discuss its general consistency with the City’s LWRP and New York State Coastal Zone Policies.

### 3.14 Environmental Justice

It is possible that future build-out of the individual lots in the Advanced Manufacturing Park may require State permits that are covered by the NYS DEC Policy CP-29 for Environmental Justice and Permitting. A preliminary screening indicates that the Project site is near a potential environmental justice area in the City of Lackawanna on the east side of NYS Route 5. The DGEIS will identify if any potential adverse environmental impacts may impact the environmental justice area and will outline how permitting for the implementation of the Master Plan and future buildout of the Advanced Manufacturing Park will meet the guidance in Policy CP-29.

### 3.15 Temporary and Short-Term Impacts

This section of the DGEIS will examine the temporary and short-term impacts stemming from the potential construction activities related to development projects identified in the Master Plan, including noise, dust and odor impacts. These impacts will be generally identified and appropriate mitigation measures will be proposed in order to lessen the temporary impacts from construction.

### 3.16 Unavoidable Adverse Environmental Impacts

Based on the results for the assessments conducted for the DGEIS, this section of the DGEIS will identify and summarize the unavoidable adverse impacts that are likely to result from implementation of the Master Plan and buildout of the industrial park subdivision. The summary will also address impacts that cannot be adequately mitigated.

### 3.17 Irreversible and Irrecoverable Commitment of Resources

This section of the DGEIS will briefly identify any resources that would be irretrievably lost as a result of implementation of the Master Plan and, therefore, would become unavailable for future use. These resources may include natural resources, such as water resources and wildlife habitat. Where applicable, these resources will have already been assessed and quantified, in Section 3 of the DGEIS.

### 3.18 Growth-Inducing Aspects

This section of the DGEIS will evaluate the likelihood that implementation of the Master Plan may cause significant increases in local population or business growth in the immediate area outside the Project site.

### 3.19 Cumulative Impact Analysis

A cumulative impact is an impact on the environment that could result from incremental impacts of a proposed action when added to other past, present, or reasonably foreseeable future actions by other entities separate from the proposed action. Cumulative impacts can result from individually minor but collectively significant actions that take place over time.

This section will include a qualitative analysis of the relationship and implications of such projects when considered in conjunction with the Project. Any future environmental documentation efforts

to be conducted with such foreseeable projects when substantially defined will be noted in the DGEIS. Elements included in this assessment will only involve projects that have advanced to an appropriate level of detail to warrant consideration. Areas of focus will include:

- Background Growth and Development Trends in Project Area
- Cumulative Impact with Other Existing and Propose Industrial Development Projects
- Cumulative Impact Analysis

#### Section 4.0 Alternatives

The DGEIS will present a qualitative evaluation of alternatives to the proposed Infrastructure Master Plan. Alternatives to be considered will include the following:

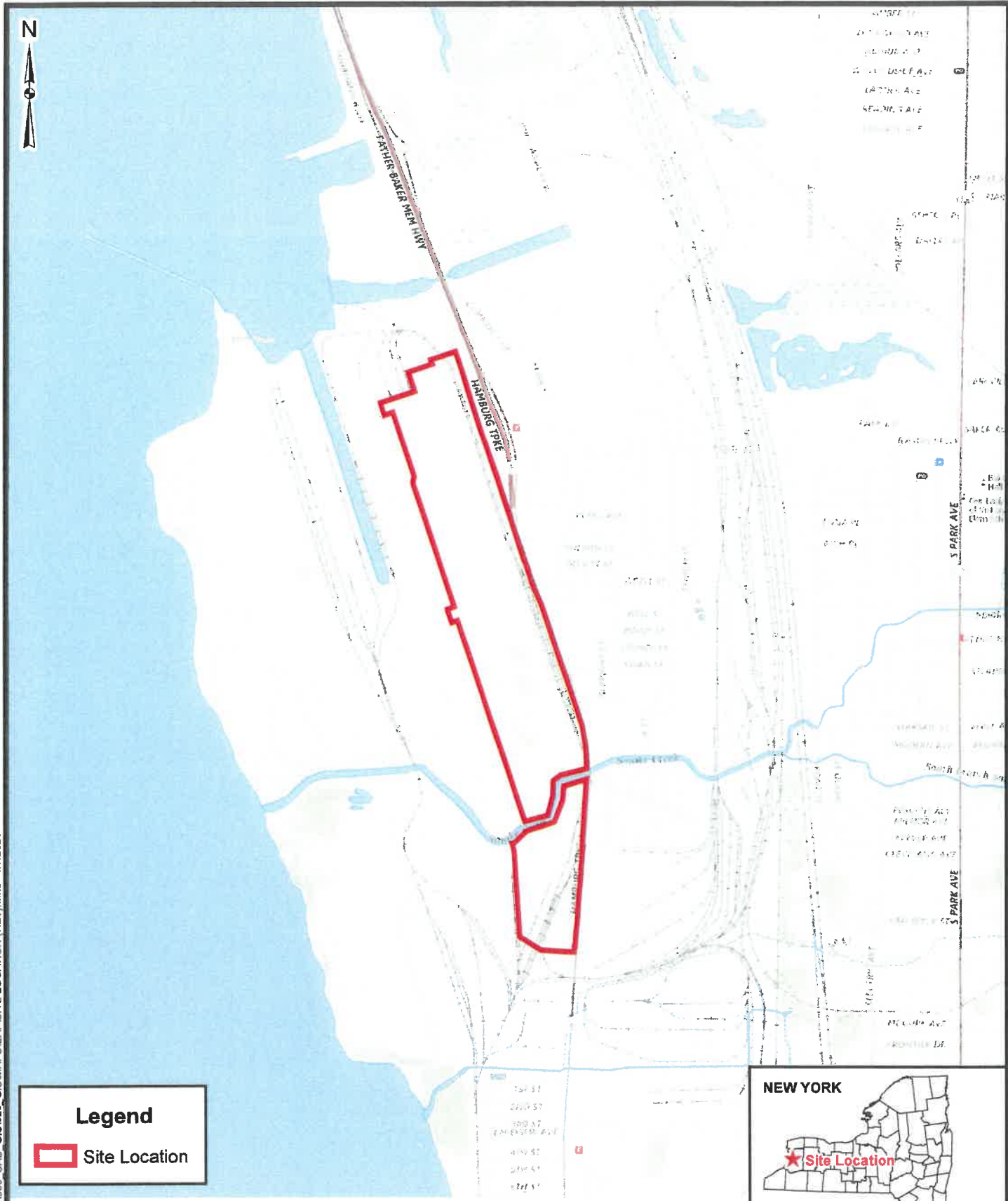
- Preferred Alternative - The preferred alternative is the proposed conceptual Master Plan and the implementation to buildout individual development lots. The potential impacts of the preferred alternative will be summarized based on their assessment in Section 3 of the DGEIS.
- Alternative Sites - Evaluation of Alternative sites will be limited to property similar in size, condition and availability to the ILDC.
- Alternative Size and Scale - Alternatives to the Project, including alternate sizing and scale of the recommended lots and street layout will be defined and their differences quantified.
- Alternative Uses of the Project site – other than the uses identified for the Preferred Alternative, land uses allowed by the adopted zoning and the Comprehensive Plan will be identified and addressed.
- “No Action” Alternative – a scenario where the Master Plan is not adopted and implemented will be described. Under the “No Action” Alternative, the ILDC property would remain in its current state and not be re-developed. The positive and negative implications will be addressed.

#### Appendices

The appendices to the Draft GEIS will include, but not be limited to:

- Real Estate Analysis Report
- Phase IA Archaeological Survey
- Traffic Impact Study
- Engineers Report
- Real Estate Analysis Report
- Preliminary Stormwater Pollution Prevention Plan
- Agency Correspondence

J:\Projects\60568845\_BSRA\_MF1900\_CAD\_GIS\1820\_GISMAPS\EA\F-SITE LOCATION (REV).mxd 1/7/2020



**Legend**

 Site Location



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





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

**CONSULTANT**  
 AECOM  
 One Penn Plaza, Suite 400  
 Buffalo, N.Y. 14202  
 716-835-9300 Ext. 7168359345 Fax  
 aecom.com

**REGISTRATION**

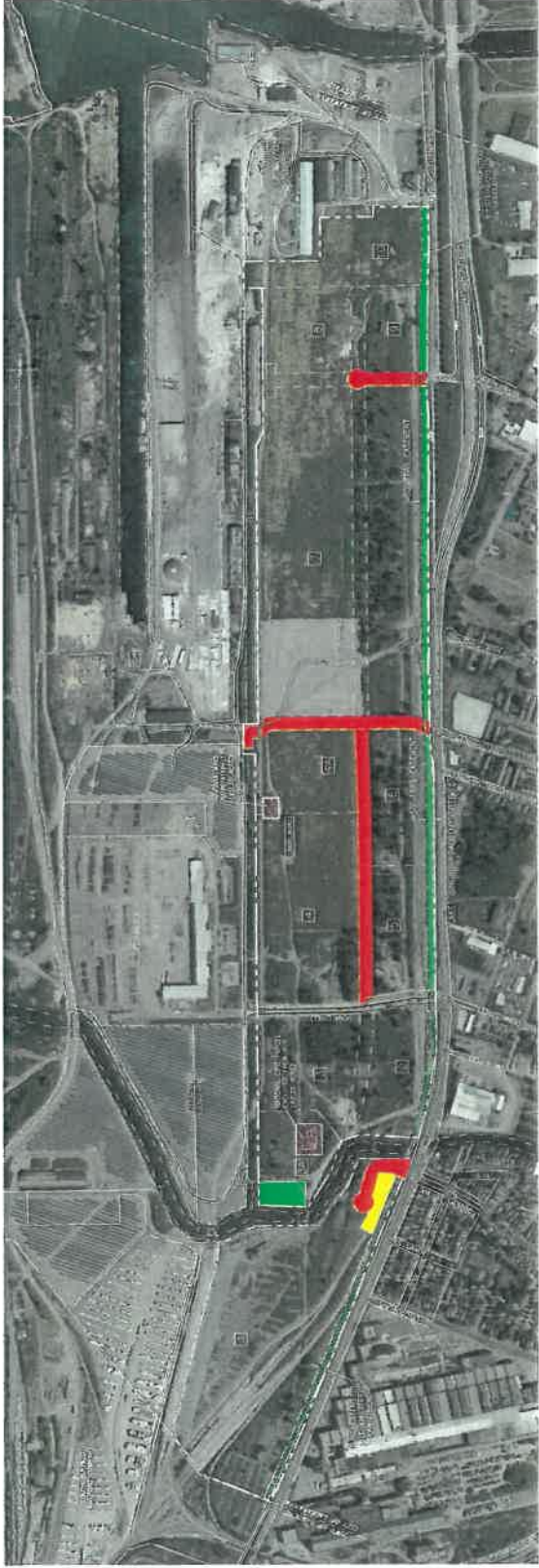
**ISSUE/REVISION**

NO.	DATE	DESCRIPTION

**PROJECT NUMBER**  
 605568845

**SHEET TITLE**  
 SITE PLAN - WITH AERIAL

**SHEET NUMBER**  
 C-2



**LOT DATA**

LOT NO.	GROSS AREA (ACRES)	DEVELOPABLE AREA (ACRES)	EXISTING ZONING
1	41.3	32.2	BRM-MI
2	6.6	6.6	BRM-LI
3	11.2	9.2	BRM-MI
3A	6.2	5.0	BRM-MI
4	24.5	19.6	BRM-MI
4A	9.9	7.8	BRM-MI
5	8.5	6.4	BRM-LI
6	9.1	6.9	BRM-LI
7	67.2	52.7	BRM-LI & BRM-MI
8	5.2	7.4	BRM-MI
9	5.6	4.4	BRM-LI
10	12.4	9.0	BRM-LI & BRM-MI
<b>SUBTOTAL</b>	<b>214.7</b>	<b>168.2</b>	
<b>ROAD RIGHT OF WAY</b>	<b>23.7</b>	<b>N/A</b>	<b>N/A</b>
<b>SHORELINE</b>	<b>11.4</b>	<b>N/A</b>	<b>N/A</b>
<b>TOTAL</b>	<b>249.8</b>	<b>168.2</b>	

\* NOT INCLUDING PROPOSED STREET R.O.W. AND SHORELINE TRAIL EASEMENT

