
PART 3 SUPPLEMENTAL EAF INFORMATION

for

Project Seneca Regional Wastewater Treatment Facility

Village of Watkins Glen
Schuyler County, New York

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1. INTRODUCTION

New York's State Environmental Quality Review Act (SEQRA) provides a process for the consideration of potential significant adverse environmental impacts in the early planning stages of the approval, funding, or permitting process for proposed actions. By incorporating a systematic interdisciplinary approach to environmental review, impacts can be identified and projects can be modified, as needed, to avoid or minimize potential adverse impacts to the environment to the maximum extent practicable. All discretionary decisions of a state, regional, or local agency to approve, fund, or directly undertake an action that may affect the environment are subject to review under SEQRA. It is the intent of SEQRA that protection and enhancement of the environment and community resources be balanced with social and economic factors in the decision-making process.

In accordance with 6 NYCRR Part 617 of the SEQRA implementing regulations, the Village of Watkins Glen's Board of Trustees (Village Board) has classified the Project as a Type 1 Action for the purposes of environmental review. The Village Board initiated a Coordinated Review of the Proposed Action on November 18, 2013, to request concurrence from the other Involved Agencies that the Village may designate themselves as the SEQRA Lead Agency, and to solicit comments from all Involved and Interested Agencies on the Proposed Action.

The following correspondence, as included in Appendix A, was received as part of the Coordinated Review of the Proposed Action and has been considered in the preparation of Parts 2 and 3 of the Full Environmental Assessment Form (FEAF) and in drafting the supporting information included in this document.

Involved/Interested Agency	Date of Response	Objection to Lead Agency?	Comments Included?
NYS Department of Environmental Conservation (NYSDEC)	4/17/2014	NO	YES
NYS Department of Agriculture & Markets (NYSA&M)	12/17/2013	NO	YES
NYS Department of Public Health (NYSDOH)	NONE	Assumed - NO	-
NYS Canal Corporation (NYSCC)	NONE	Assumed - NO	-
NYS Department of State (NYSDOS)	NONE	Assumed - NO	-
NYS Department of Transportation (NYSDOT)	11/25/2013	NO	NO
NYS Environmental Facilities Corp (NYSEFC)	12/3/2013	NO	YES
Schuyler County Public Health Department	12/2/2013	NO	NO
Schuyler County Highway Department	12/3/2013	NO	NO
Schuyler County Soil & Water Conservation District	11/22/2013	NO	YES
US Army Corps of Engineers (USACE)	12/9/2013	NO	YES
US Department of Agriculture Rural Development	NONE	Assumed - NO	-
Schuyler County Partnership for Economic Development (SCOPED)	12/4/2013	NO	NO
Southern Tier Regional Planning & Development Board	12/5/2013	NO	NO
Village of Montour Falls	11/27/2013	Assumed - NO	NO

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Watkins Glen School District	11/25/2013	NO	NO
Finger Lakes Railway Corp.	NONE	Assumed - NO	-
Town of Reading	11/25/2013	NO	NO
Town of Dix	NONE	Assumed - NO	-
Schuyler County Legislature	NONE	Assumed - NO	-
Schuyler County Environmental Management Council	NONE	Assumed - NO	-

Correspondence was also received from the following interested groups/agencies and is also included in Appendix A.

Agency/Group	Date	Document Type/Comments Summary
Seneca Lake Area Partners in 5 Counties (SLAP-5)	12/2013	Letter of Support
Dr. John Halfman, Hobart & William Smith Colleges	12/10/2013	Letter of Support
US Depart. of the Interior – Fish and Wildlife Service (USFWS)	5/13/14	BGEPA Permit Requirements
NYS State Historic Preservation Office (SHPO)	1/30/14	Request for Phase 1

2. PROJECT DESCRIPTION

The Villages of Watkins Glen and Montour Falls are partnering in a joint effort to address the aging wastewater treatment infrastructure in each Village. Currently, each Village owns and operates its own Wastewater Treatment Plant (WWTP) and sewer collection system.

The Village of Watkins Glen WWTP, located along the southern shoreline of Seneca Lake, provides up to secondary treatment of wastewater prior to discharge to the Lake. The plant has historically experienced seasonal wet weather flows (inflow/infiltration, or I/I) that exceed the hydraulic capability of various treatment processes, which result in solids loss to the lake and non-compliance of permit limits for fecal coliform, total suspended solids, settleable solids, and residual chlorine levels. The Village's Consent Order with the NYSDEC cites a total of 44 settleable solids excursions, 29 months with fecal coliform excursions, and seven (7) total suspended solids/concentration excursions. In addition, the Village of Watkins Glen WWTP does not meet the minimum radial isolation separations between treatment units and habitation/areas of substantial public use, as defined by the NYSDEC Technical Information Pamphlet (TIP) No. 19 for minimum "buffer" distances for municipally owned plants. As a result, the Village has received many odor complaints associated with the WWTP, and the above mentioned wet weather issues lead to closings of the nearby municipal beach. The plant's outfall is located between a public access beach and the Village's drinking water intake.

The Village of Montour Falls WWTP is located along the Barge Canal, which discharges into Seneca Lake in the Village of Watkins Glen, just south of its confluence with Catharine Creek. Hydraulic over-loading of various WWTP unit processes has been reported since

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1969, prompting the construction of a 320,000-gallon wet-weather lagoon adjacent to the plant's influent pump station in 1986, and the addition of a second clarifier to retain solids. Though not under a NYSDEC Consent Order, the Village was advised during their annual NYSDEC inspections that a corrective action plan must be implemented for locating and mitigating I/I in its collection system. Similar to the Watkins Glen WWTP, the Montour Falls WWTP is located within 300-feet of an area of substantial public use (camping), and has received numerous odor complaints. Further, the majority of the unit process tanks at the Village of Montour Falls WWTP are exposed and highly visible to passing traffic and the adjacent campground area.

The proposed Project Seneca Regional Wastewater Treatment Facility (the "Regional WWTP" or "Plant") will address the needs of the Villages of Watkins Glen and Montour Falls as described above. The scope of the proposed Project Seneca Regional WWTP Facility and related components (collectively referred to as the "Proposed Action"), includes:

- Decommissioning and site reclamation of the existing Village of Watkins Glen WWTP (see Figure 1, as attached):
 - The existing Watkins Glen WWTP would be decommissioned and demolished and the site reclaimed for future waterfront and/or recreational use.
- Construction of a new Main Pumping Station in the Village of Watkins Glen (see Watkins Glen Pump Station Plan, Figure 2, as attached):
 - Sewer flows from the Village of Watkins Glen and the Towns of Reading and Dix will be conveyed to a new sewage pump station via a new 24-inch gravity influent sewer main. The new sewage pump station will consist of a precast concrete wet well, valve vault, and control building.
- Watkins Glen Force Main (see Figure 1, as attached):
 - Sewer flows from the new Watkins Glen Main Pumping Station would be conveyed to the new Regional WWTP via approximately 5,200 LF of new 18-inch diameter high density polyethylene (HDPE) force main. The proposed force main alignment would run parallel and adjacent to the Catharine Valley Rail Trail (abandoned railroad tracks) north of the Watkins Glen Central High School, before crossing the Barge Canal at the proposed location for the new Regional WWTP Headworks Building.
- Decommissioning and modifications to the existing Village of Montour Falls WWTP (see Montour Falls Pump Station Plan, Figure 3, as attached):
 - The existing Montour Falls WWTP would be decommissioned and the majority of the existing sewer infrastructure would be demolished. The existing WWTP site would be converted to a new Montour Falls Sewage Pump Station. Sewer flows from the Village of Montour Falls would be conveyed to the new sewage pump station via the existing 12-inch trunk sewer. The existing wet well would be retrofitted to serve as the wet well for the new pump station. Improvements

would include the construction of a new concrete valve pit and a pump station control building. A new 60-foot diameter, 300,000-gallon concrete wet-weather storage tank would be constructed within the existing open lagoon area and backfilled.

- Montour Falls Force Main (see Figures 1 and 3, as attached):
 - Sewer flows from the new Montour Falls Pump Station would be conveyed to the new Regional WWTP via approximately 9,300 LF of new 10-inch diameter HDPE force main. The proposed force main alignment would generally run parallel to the eastern shoreline of the Barge Canal, along the existing Airport Road/Commissioner Policy 3 (CP3) Trail, and outlet to the new Regional WWTP Headworks Building. The force main would be directionally drilled beneath L'Hommedieu Diversion Channel, Seneca Lake Inlet, and any state/federal wetlands to avoid resource impacts.
- Construction of a new 1-million gallons per day (MGD) Regional WWTP (see Figures 4 & 5, as attached):
 - The Villages completed a detailed Site Selection Analysis (Appendix B) that evaluated seven (7) sites for the proposed Regional WWTP, with each site evaluated based on sixteen (16) different criteria. The analysis identified the most practicable site, which was then used to develop the Proposed Action and allow for the completion of the full environmental review.
 - The proposed Regional WWTP will be located on an 8.6-acre vacant parcel of land that is proposed to be acquired from the New York State Canal Corporation (NYSCC). This vacant parcel was used as a dredging Upland Disposal Site (UDS) by the NYSCC during the original Barge Canal construction, and has not been used by the NYSCC since (hence its reference as the Historic UDS). The property is bounded on the west by the Barge Canal (also referred to as Chemung Barge Canal in some sources), to the north by the NYSCC active UDS 6-25, and to the east and south by the Catharine Creek Wildlife Management Area/Queen Catharine Marsh. The 8.6-acres proposed for acquisition is shown on Figure 5.
 - Access to the property would be through a new 2,800 LF private road/driveway, to be constructed south from the existing paved Boat Launch Road/recreation building access drive, and , which would cross property currently owned by Cargill Corporation, NYSCC, and the Watkins Glen Yacht Club. The access road will include fencing and visual screening to provide a barrier from the Watkins Glen Yacht Club property.
 - A future septage receiving station, if funding is secured, could be constructed along the access road adjacent to the Village's existing Department of Public Works barn/yard, and would include a submersible pump station and force main to transfer septage waste to the south and into the Regional WWTP.
 - The major components of the new Regional WWTP include the construction of a new Headworks/Control Building, an odor control treatment system within

that building, three (3) sequencing batch reactor (SBR) tanks and a single equalization tank, two (2) covered aerobic digester tanks, a digester equipment/solids dewatering building, a return pump station, an ultraviolet (UV) treatment building/tertiary treatment effluent filter building, and approximately 250 LF of submerged gravity outfall pipe to the Barge Canal.

- The proposed Regional WWTP may require bulk chemical storage, which would include storage of polymer for sludge dewatering and alum or ferric chloride for chemical precipitation of phosphorous during wastewater treatment.
- Miscellaneous site improvements include the construction of internal site driveways and parking areas on the west side of the Headworks/Control Building, stormwater management facilities, plantings for visual screening of the proposed Regional WWTP from the adjacent Barge Canal, and screening fence on the eastern boundary of the site to provide a visual barrier from an adjacent bald eagle's nest. All building first floor elevations would be at or above NAVD 29 elevation 450.0, or 1-foot or more above the 100-year flood elevation for the property.
- Adequate space will be available within the acquired parcel for future construction of a second SBR/equalization/aerobic digester tank complex.

3. DETAILED INFORMATION ON REASONS TO SUPPORT PART 3 DETERMINATION

The following provides a detailed assessment of the potential “moderate to large” environmental impacts of the Proposed Action, as identified in Part 2 of the FEAF, and additional information addressing why the Proposed Action will not result in a potential significant adverse environmental impact. “Small” impacts are also assessed in this document to be overly deliberative and provide further consideration of the potential for the Proposed Action to have an adverse effect on the environment. Discussion of each potential impact will identify how the impact will be avoided and/or minimized by project design and/or construction control measures, and/or adherence to permit criteria and requirements. This information has been prepared to support Part 3 of the SEQRA FEAF and has been organized in accordance with the SEQRA FEAF Part 2 outline.

3.1. Impact on Land

3.1.a. The Proposed Action may involve construction on Land where depth to water table is less than 3 feet. Moderate to large impact may occur.

Based on a review of soil boring data obtained at four (4) soil bore locations within the Historic UDS (including one piezometer), the soils at the proposed Regional WWTP site generally consist of soft to medium silt with some fine sand and trace amounts of clay, within the upper 10 feet of the soil profile. Groundwater levels at the four (4) soil bore locations were recorded at a depth of between six (6) feet and 12 feet from the soil surface. See Appendix C for the soil boring logs and confirmation of the water levels at the four (4) bore locations.

The close proximity to the Barge Canal and Seneca Lake also influences a high groundwater table. The groundwater table is expected to be closer to the ground surface in some areas of the project than others. Locations where the groundwater table is less than three (3) feet in depth are anticipated. Construction in areas of shallow groundwater can significantly increase construction costs due to groundwater dewatering for deeper excavations.

Avoidance and minimization of the impacts that may result from construction on the site’s documented soil types and groundwater conditions includes:

- Placing/compacting site fill (ie., pre-load the site) to raise the site and structures above the 100-year flood plain, effectively reducing the depth of excavation and associated dewatering.
- Constructing the Plant’s Headworks screening and grit removal, which are typically set at the lowest elevation at WWTPs, at the north end of the site at a higher elevation to raise the WWTP’s hydraulic grade elevation. This would ensure that downstream treatment tanks/unit processes (ie., SBRs, flow equalization pumped to effluent filters and UV disinfection) can also

be elevated and constructed with the minimum amount of dewatering and excavation.

- Use of drilled pile support systems, rock piles, and/or floating slabs for building and structure foundation systems to minimize excavation and dewatering needs.
- Use of common-walled tanks and/or buildings, earthen fill, or overhead insulated pipe support systems to reduce excavation/dewatering for yard piping construction.

3.1.e. The Proposed Action may involve construction that continues for more than one year or in multiple phases. Moderate to large impact may occur.

As noted in Part 1 of the SEQRA FEAF, the construction for the Proposed Action is anticipated to last approximately 22 months. The general concern with lengthy construction, with respect to land impacts, is the extended exposure of disturbed soils which are more susceptible to erosion and sedimentation runoff.

Avoidance and minimization of the impacts that may occur due to a lengthy construction period includes:

- Construction sequencing and phasing to limit areas of disturbance to no greater than five (5) acres, as practical, which will first include the construction and restoration of the WWTP access road, and then the construction and restoration of the proposed Regional WWTP. A variance will be secured from the NYSDEC if greater than five (5) acres of soil will need to remain open at one time during construction.
- Erosion and sediment control best management practices (BMPs) will be utilized to avoid and minimize impacts. These elements will be defined in a site-specific Stormwater Pollution Prevention Plan (SWPPP), and may include:
 - stabilized construction site entrance roadway for construction vehicle cleaning;
 - staked and recessed silt fence placed immediately downslope of any unconsolidated soil areas;
 - soil stockpiles surrounded by staked and recessed silt fence, and covered with tarps at the end of each work day and upon the onset of any precipitation event; and
 - final stabilization (seeding and mulching) as soon as feasible of finished grading.

3.2. Impact on Geological Features

The Proposed Action is not anticipated to result in the modification or destruction of, or inhibit access to, any unique or unusual land forms on the site (e.g., cliffs, dunes, minerals, fossils, caves).

3.3. Impact on Surface Water

3.3.d. The Proposed Action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body. Small impact may occur.

A review of the NYSDEC's freshwater wetland mapping for Schuyler County indicated that there were NYSDEC regulated freshwater wetlands within and/or adjacent to the locations of the Proposed Action. As shown on Figure 6, NYSDEC regulated Wetland MF-1 is mapped along the east and west sides of the Barge Canal; from State Route 14 in the Village of Montour Falls to the Watkins Glen Central High School on the west side, and generally from the L'Hommedieu Diversion Channel in the Village of Montour Falls to State Route 414 in Watkins Glen along the east side. A wetland field delineation was completed in the summer of 2013 and fall 2014 to confirm the presence of this wetland and demarcate its boundaries along both sides of the Barge Canal. A Wetland Delineation Report (B&L, 2015) was completed to summarize the methodology used to locate the wetland boundaries in the field and to illustrate the results of this delineation effort. This report, which shows the extent of federal and NYSDEC regulated wetlands along the Barge Canal, is included in Appendix D.

The access road to the Regional WWTP (see Figure 4) is located proximal to NYSDEC regulated Wetland MF-1. Where feasible, the access road has been located entirely outside of Wetland MF-1 and its associated 100-foot regulated adjacent area. The alignment of the access road was designed to avoid and minimize impacts to Wetland MF-1; however, some impacts were unavoidable due to limitations imposed by adjacent land uses. Land area limitations near the Watkins Glen Yacht Club boat house and concerns regarding pedestrian traffic/safety in this area, require the access road to be partially located within the regulated boundary of Wetland MF-1 and its adjacent area. The proposed Regional WWTP access road is similar in size and function as the existing Boat Launch Road, which is also partially within the adjacent area of Wetland MF-1.

Portions of the access road will be located within the 100-foot regulated adjacent area (approximately 1.3 acres) and within the regulated boundary of Wetland MF-1 (approximately 0.22 acres). The approximate 0.22 acres of permanent wetland impact also falls under the jurisdiction of the USACE (Nationwide Permit Program), since Wetland MF-1 is also protected by federal regulations (though

there are no federally regulated adjacent areas). Aside from this impact, no additional permanent loss of wetland will occur as a result of the Proposed Action. Additional temporary wetland and adjacent area impacts may occur as a result of the Proposed Action, particularly along the force main alignments.

Avoidance and minimization of potential wetland impacts were achieved through the following project features:

- Fencing/screening will be installed around the Regional WWTP, in lieu of larger earthen berms, to provide a barrier between the Plant and the adjacent wetland areas while reducing the required separation distance and minimizing wetland disturbances.

Construction of the access road will require the installation of subgrade and fill material. Sheeting will be installed to minimize and control the application of fill material within the wetland areas. Temporary fencing will be used along the access road to prevent the disturbance of soil beyond that necessary for construction.

- As shown on the attached Regional WWTP Site Plan (Figure 5), the Plant and associated appurtenances (not including the access road) are proposed to be placed outside the 100-foot regulated adjacent area of Wetland MF-1 and outside the footprints of the two (2) small isolated wetlands delineated on this site. Therefore, no encroachment on Wetland MF-1 or its regulated adjacent area by the Regional WWTP is expected to occur. Avoidance of wetland impacts at the WWTP site will be achieved by the use of temporary fencing to delineate the limits of disturbance during construction.
- It is proposed to construct the force main from the Montour Falls Pump Station along the east side of the Barge Canal, as shown on Figure 1. The force main alignment will generally follow the existing Airport Road/Commissioner Policy 3 (CP3) Trail that parallels the Canal north of Marina Drive in the Village of Montour Falls. Portions of this main alignment are bounded on either side by portions of Wetland MF-1. Open cut installation of the force main would result in additional impacts to Wetland MF-1, its adjacent area, and to L'Hommedieu Diversion Channel and Seneca Lake Inlet. In order to minimize additional impacts to these surface water resources, approximately 4,200 LF of force main will be installed between Marina Drive and the Regional WWTP site by horizontal directional drilling to reduce surface disturbances and to avoid potential erosion and sedimentation into the adjacent wetlands, creeks, and Barge Canal. The length of directional drilled segments will be confirmed during design, but approximate 400- to 600-foot intervals are anticipated. Open cut connections will be required for pipe fusing between drilled segments,

which will require moving equipment and establishing new points of ingress. This temporary disturbance will be restored upon completion of fusing operations. Temporary disturbance to the adjacent wetland areas will be avoided to the extent practicable; however, temporary ground disturbance within state regulated wetland buffer areas along the Airport Road/CP3 Trail will occur.

- The proposed alignment of the Regional WWTP access road will result in the permanent conversion of 0.22 acres of Wetland MF-1. Permittee responsible compensatory mitigation for this impact is proposed to occur “in kind” and “on site”, in accordance with the NYSDEC’s wetland mitigation regulations (6 NYCRR Part 663). The 0.22 acres of impacted wetland constitutes a palustrine emergent wetland type (PEM), further characterized as a dominance of reed canary grass (*Phalaris arundinacea*), cattail (*Typha* sp.), and arrow-leaf tearthumb (*Persicaria sagittata*). The proposed access road alignment has been designed to minimize the amount of wetland acreage, wetland function, and wetland value lost. The creation of 0.22 acres of PEM wetland is proposed to replace the lost wetland acreage and function that will be experienced along the access road alignment. The significant social need and public benefits created by the Proposed Action are considered when weighing the potential minor wetland losses and assembling a proposed plan meeting NYSDEC’s and USACE’s wetland mitigation requirements.

Proposed mitigation for the 0.22 acres of permanent wetland encroachment will include the creation of 0.22 acres of shallow emergent marsh wetland near the south end of the parcel of land to be acquired from NYSCC. This mitigative action represents a one to one (1:1) ratio of impacted wetland acres to created wetland acres. The proposed wetland mitigation area is located outside of the 660-foot protective buffer from the adjacent bald eagle’s nest. The proposed on-site mitigation effort will help maintain the size and integrity of Wetland MF-1. There is potential for the created wetland area to be constructed within the Wetland MF-1 adjacent area, if such an action is deemed beneficial by the permitting agencies (NYSDEC and USACE) and is permitted as part of the Proposed Action.

Generally, this mitigation wetland will be created by excavating an existing upland area, adjacent to the 100-foot adjacent area of Wetland MF-1, down to six (6) inches below the adjacent wetland grade and then broadcasting approximately six (6) inches of wetland soils, excavated from the impacted wetland area, across the excavated limits. Excavation will allow wetland hydrology to establish in the wetland mitigation area, and placement of excavated wetland soils will establish hydric soils at the creation site, as well as bring a seed bank of wetland plants that are already present within

the Wetland MF-1 system. This mitigation area will then be seeded with a native wetland plant mix and mulched to hold the seed in place through germination.

Specific details associated with the proposed wetland mitigation are still being finalized; however the above proposal is considered to be the primary option. If site characteristics are found to be unsuitable for wetland mitigation or if the permitting agencies are not amenable to the on-site mitigation plan, a suitable location will be identified off site, and potentially a great distance from the floodplain wetland communities represented by Wetland MF-1. A formal wetland mitigation plan will be provided to the NYSDEC and the USACE as part of the Joint Application for Permit request, which will be submitted upon completion of final project design. Elements of the mitigation plan will be modified, as necessary, to obtain approval from the permitting agencies.

In addition to the components of the Proposed Action that will be constructed within or adjacent to NYSDEC (and USACE) regulated wetland MF-1, construction activities will also take place along the banks of the Barge Canal. A new sewer outfall will be constructed in the banks and is proposed to outlet to the Canal. In addition, underground sewer force main will be installed along the east side of the Canal. Minimal impacts from the construction of these elements on the Barge Canal are anticipated. The Village of Montour Falls WWTP currently discharges to the Barge Canal, while the Village of Watkins Glen's existing WWTP outfall is along the banks of Seneca Lake. No impacts to the water quality or quantity of Seneca Lake or the Barge Canal are expected in response to the Proposed Action. The Proposed Action is consistent with existing uses in the Seneca Lake watershed.

3.3.g. The Proposed Action may include construction of one or more outfall(s) for discharge of wastewater to surface water(s). Moderate to large impact may occur.

Construction of the proposed Regional WWTP will include a new outfall sewer that will discharge effluent treated to tertiary standards to the Barge Canal, a Class C, C(T) water. This new effluent discharge point will require a new State Pollution Discharge Elimination System (SPDES) permit to be obtained from the NYSDEC and maintained by the Village of Watkins Glen.

Potential impacts that may result from the construction of the new outfall include erosion of the Canal banks from soil disturbances and wastewater discharge velocities. Further impacts could include sedimentation and siltation within the Canal from excavation activities; however, those impacts will be avoided through the following project design elements:

- The proposed outfall sewer will be a submerged discharge location within the Canal and will include a concrete headwall, rip-rap bank armoring, and stabilization to prevent bank and bed erosion. The discharge location will be signed on the shoreline in accordance with SPDES permit requirements advising of the permitted discharge.
- The proposed outfall will not interfere with Canal navigation and maintenance activities (e.g. dredging).
- Construction of the outfall will be completed during low water level conditions and will be coordinated and permitted through the NYSCC.
- Temporary construction measures will also include the installation of a cofferdam and turbidity curtain to contain any silt and sedimentation created during excavation activities.

The final alignment, depth and distance from the eastern Canal shoreline will be designed in consultation with the NYSDEC, NYSCC, USACE, and US Coast Guard, if necessary, and will be permitted accordingly. Boaters will also be advised of the pipe by signage which advises against anchoring around the submerged pipe.

3.3.h. The Proposed Action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies. Small impact may occur.

Temporary soil disturbance during construction activities could have a short-term impact on stormwater runoff and erosion potential. The disturbance of vegetated surfaces creates the opportunity and concern for soil erosion and sediment loss. The proximity of the Proposed Action to Seneca Lake and the Barge Canal presents concerns for the potential temporary siltation of these adjacent water resources and community assets.

Stormwater regulations developed and administered by the NYSDEC will be applicable to the discharge of stormwater from construction activities for the proposed Regional WWTP (ie., more than one (1) acre of soil will be disturbed). Coverage under the General Permit for Stormwater Discharges from Construction Activities (GP-0-15-002) will be requested from the NYSDEC. In order to use this General Permit, an electronic Notice of Intent (eNOI) form will be completed and submitted to the NYSDEC at least five (5) business days prior to any earth-disturbing activities, and a SWPPP for the site will be prepared and followed during the construction activities. Compliance with the NYSDEC's stormwater regulations will generally require the following:

- Preparation and execution of a Erosion and Sediment Control (E&SC) Plan;
- Preparation of a post-construction stormwater control plan;
- Periodic inspection of the site to ensure compliance with the E&SC Plan and conditions of GP-0-15-002; and
- A SWPPP Ledger must be maintained and kept on site for the duration of construction.

The NYSDEC views the NYS Canal system as a fifth order or higher waterbody; therefore, because all stormwater from the Regional WWTP parcel will be discharged to the adjacent Barge Canal, the Proposed Action will qualify for a waiver for water quantity controls. Preparation of a site-specific SWPPP will include the design and incorporation of post-construction water quality and runoff production controls. The following BMPs may be designed and utilized, as needed, in accordance with NYSDEC standards and regulations:

- Perimeter silt fencing will be installed at the boundaries of excavation for the pump stations, WWTP site, access road and force mains;
- Areas of disturbance, including topsoil and other material stockpiles, will be temporarily stabilized to prevent erosion and soil runoff. These areas will be covered with tarps at the end of each work day and upon the onset of any precipitation event;
- Final stabilization (seeding and mulching) as soon as feasible of finished grading activities;
- Check dams will be installed within drainage swales to capture sediment from construction site run-off;
- Construction of a stormwater retention pond to collect and treat site run-off prior to discharge to the Barge Canal;
- A stabilized construction entrance(s) with adequate drainage and treatment facilities will be constructed and maintained along the WWTP and force main construction access roads; and
- Site inspections will be completed on a weekly basis to ensure that all BMPs have been installed, are being maintained, and are functioning properly.

3.3.i. The Proposed Action may affect the water quality of any water bodies within or downstream of the site of the Proposed Action. Small impact may occur.

As previously discussed, the construction activities associated with the Proposed Action will include excavation and soil disturbance which may present an opportunity for temporary erosion and sediment-laden stormwater runoff to enter the adjacent Barge Canal. However, this potential impact will be avoided, as previously noted, through the implementation of the Erosion and Sediment Control Plan BMPs noted above. Therefore, no significant adverse impacts to the water quality of adjacent water bodies are anticipated.

Replacement of the existing failing Village of Watkins Glen and Village of Montour Falls WWTPs with a new, modern WWTP will result in a significant improvement of water quality in both the Barge Canal and Seneca Lake. The new plant will eliminate current problems with discharge water quality, and tertiary treatment will provide cleaner discharge than either of the existing plants currently produce. As shown below, the result is a significant positive environmental impact to water quality through reduced nutrient loading, elimination of chlorine usage/discharge, and improved wastewater disinfection through the use of ultraviolet technology.

3.3.k. The Proposed Action may require construction of new, or expansion of existing, wastewater treatment facilities. Small impact may occur.

As stated previously, the nature of the Proposed Action is to construct a new Regional WWTP that will provide a higher level of “tertiary” treatment compared to the two (2) existing Village of Watkins Glen and Village of Montour Falls WWTPs that are designed and permitted to achieve “secondary” treatment. The new Regional WWTP will include:

- Automatic, influent fine screening and grit removal to remove inorganic solids;
- Three continuous flow SBRs, operating in parallel, to achieve a minimum 95-percent (%) biochemical oxygen demand (BOD) reduction and maximum effluent BOD concentration of 15 mg/L as compared to 85-percent (%) removal and 30 mg/L at the existing Village of Watkins Glen and Village of Montour Falls WWTPs when operating at peak efficiency;
- Cloth disk filters will be used for tertiary treatment and will further reduce BOD and total suspended solid (TSS) removals and concentrations to five (5) mg/L each, and total phosphorus to at or below one (1) mg/L.

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- Use of effluent ultraviolet disinfection, which will utilize ultraviolet light to meet fecal coliform removals and replace the current use of effluent chlorination. The elimination of chemical disinfection will effectively remove over 2,800 pounds of chlorine from Seneca Lake annually.
- A new outfall sewer to the Barge Canal, located approximately 4,500 feet (0.85-mile) south of the Canal's confluence with Seneca Lake, offering better assimilative capacity and mixing prior to discharge to the Lake.

The new Regional WWTP will remove the two existing WWTP outfall sewers from the Canal (Montour Falls) and Seneca Lake (Watkins Glen). The higher level of treatment afforded by the new Regional WWTP will result in the following projected effluent load reductions for BOD, TSS, phosphorous (P), ammonia nitrogen (NH₃), and chlorine residual to the Canal and to Seneca Lake.

Parameter	(V) Montour Falls Existing WWTP	(V) Watkins Glen Existing WWTP	Proposed Regional WWTP	Net Reduction at 0.7 MGD	Net Reduction at 1.0 MGD
Avg. Daily Flow, MGD	0.3 MGD	0.4 MGD	0.7 MGD*	-	
Effluent BOD, lbs/yr.	14,800	14,800	10,000	66%	49%
Effluent TSS, lbs./yr.	10,800	17,900	10,000	65%	47%
Effluent P, lbs/yr.	4,600	5,400	1,000	90%	85%
Effluent NH ₃ , lbs/yr.	5,600	6,400	2,000	83%	75%
Chlorine Residual, lbs/yr.	0	2,800	0	100%	100%

(*) Additive of two existing WWTP average daily flows; does not include future growth.

As shown above, the Regional WWTP at current and projected full design capacity will result in significant reductions in pollutant loading to the Barge Canal and Seneca Lake. The result is a significant positive environmental impact to the water quality of Seneca

Lake through reduced nutrient loading, elimination of chlorine usage/discharge, and improved wastewater disinfection through the use of ultraviolet technology.

3.4. Impact on Groundwater

3.4.f. The Proposed Action may require the bulk storage of petroleum or chemical products over ground water or an aquifer. Small impact may occur.

As previously mentioned, the proposed Regional WWTP may require bulk chemical storage, which would include storage of polymer for sludge dewatering and alum or ferric chloride for chemical precipitation of phosphorous during wastewater treatment. The Proposed Action does not overlie a Principal or Primary Aquifer, as mapped by the NYSDEC, or a Sole Source Aquifer, as mapped by the Environmental Protection Agency (EPA); however, the Proposed Action is shown within the limits of a confined aquifer, as mapped by Todd S. Miller on the Unconsolidated Aquifers in Upstate New York – Finger Lakes Sheet (Miller, 1988). The Proposed Action is not expected to have any adverse impacts on ground water quality or quantity. Use and storage of any bulk chemicals required as part of the wastewater treatment process will be in accordance with applicable state regulations. Storage of such chemicals will be provided inside the Headworks Building, further limiting the potential for a spill or leak to occur that would affect the confined aquifer or site groundwater.

3.5. Impact on Flooding

3.5.b. The Proposed Action may result in development within a 100 year floodplain. Small impact may occur.

As shown on Figure 7, the proposed Regional WWTP will be located in floodplain Zone A3 of the Barge Canal, with an anticipated 100-year base flood elevation of 449 feet. In an unlikely circumstance, flooding of the proposed Regional WWTP could impact the treatment capacity of the facility and result in the release of untreated, raw sewage or sludge. Further, 10 State Standards (GLUMRB, 2004) requires all WWTP structures, electrical and mechanical equipment to be protected from damage by the 100-year flood. Any potential impacts associated with the 100-year floodplain shall be avoided through the use of the following design elements, in accordance with 6 NYCRR Part 502: Floodplain Management Criteria for State Projects:

- Proposed treatment tanks will be constructed with top of tank wall elevations that are a minimum of two (2) feet above the 100-year flood elevation;
- Proposed building first floor elevations will be constructed with a minimum first floor elevation of 451 feet NAVD 29, or two (2) feet above the 100-year flood elevation;

- The main electrical, instrumentation and control system panels will be elevated a minimum of two (2) feet above the building first floor elevations;
- All new motors and controls shall be installed above the flood elevation, when feasible. Any motors or electrical equipment that must be below the flood elevation shall be rated for submersible duty to ensure equipment continues to operate during flood events; and
- The proposed Regional WWTP's main emergency generator will be located at least two (2) feet above the 100-year flood elevation to ensure the generator remains accessible and in service during 100-year flood conditions.

The construction of the Regional WWTP within the 100-year floodplain will require confirmation from the Village of Watkins Glen code enforcement that the Proposed Action will be completed in accordance with the Village's Flood Damage Prevention Local Law #3 (1978). Issuance of this local permit provides coverage in accordance with the NYSDEC's 6 NYCRR Part 500 Floodplain Management Regulations Development Permit.

The Proposed Action will not result in any increase in flood elevations. Elements of the Proposed Action (Regional WWTP and access road) are located within the backwater influence of Seneca Lake. The flood elevations of Seneca Lake and the flooding areas impacted by Seneca Lake will not be affected by the fill activities and soil disturbance associated with the Proposed Action due to the size of fill area and quantity of fill in comparison to the total area of the Seneca Lake floodplain.

The Barge Canal system is recognized as a fifth order or larger waterbody. Since stormwater from the Regional WWTP parcel will be discharged to the Canal, the SWPPP for the Proposed Action does not need to provide controls for the 10-year or 100-year storm events. A waiver for water quantity controls will be requested during completion of the Notice of Intent (NOI) for the SPDES Permit.

3.5.d. The Proposed Action may result in, or require, modification of existing drainage patterns. Small impact may occur.

The construction of the proposed Regional WWTP will result in permanent covertype conversions and the creation of impervious surfaces. These actions will result in minor modifications to the existing surface water drainage patterns exhibited on the site. As previously discussed, the NYSDEC's stormwater regulations will be followed to ensure that appropriate temporary and permanent erosion and sediment control measures and stormwater infrastructure is adequately designed and installed. Stormwater from the impervious surfaces installed on site will be collected, treated, and discharged to the adjacent Barge Canal.

3.6. Impacts on Air

The Proposed Action will not include a state regulated air emission source.

3.7. Impact on Plants and Animals

3.7.a. The Proposed Action may cause reduction in population or loss of individuals of any threatened or endangered species, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site. Moderate to large impact may occur.

3.7.b. The Proposed Action may result in a reduction or degradation of any habitat used by any rare, threatened or endangered species, as listed by New York State or the federal government. Small impact may occur.

3.7.c. The Proposed Action may cause reduction in population, or loss of individuals, of any species of special concern or conservation need, as listed by New York or the Federal government, that use the site, or are found on, over, or near the site. Moderate to large impact may occur.

3.7.d. The Proposed Action may result in a reduction or degradation of any habitat used by any species of special concern and conservation need, as listed by New York State or the Federal government. Small impact may occur.

Information and records were obtained to identify potential state and federal threatened, endangered, special concern, and candidate species that have been documented within and near the location of the Proposed Action. These results and ensuing discussion related to the potential adverse impacts, if any, to each reported protected species and its suitable habitat(s) are provided below.

Leedy's Roseroot

The USFWS' Information, Planning and Conservation (IPaC) System identified one (1) federally threatened plant species occurring in the vicinity of the Proposed Action: Leedy's roseroot (*Rhodiola integrifolia* ssp. *leedyi*). Leedy's roseroot is a succulent plant with compound leaves that is found on rocky cliffsides, and is known to occur around Seneca Lake, with one (1) plant known to occur in the Village of Watkins Glen. According to information received from the NYNHP in a letter dated November 22, 2013 (included in Appendix A), "the plant is growing on a south-facing shale cliff about 15 feet above the ground. The cliff is adjacent to a parking lot." This habitat occurs along the steep fjord walls to the east and west of the Catharine Creek Valley, not immediately adjacent to the proposed Regional WWTP, pump stations locations, or force main routes. The Proposed Action lies in the middle of the Seneca Lake

floodplain, well away from the fjord walls, and does not have rocky cliff face habitat that would support this plant. Therefore, suitable habitat to support populations of Leedy's roseroot was not identified within or adjacent to the facility locations included as part of the Proposed Action. The Proposed Action is not anticipated to adversely affect this plant.

Bald Eagle

IPaC System records did not indicate the presence of bald eagles (*Haliaeetus leucocephalus*) on or near the Proposed Action locations, nor did NYNHP. However, a large stick nest was first observed near the eastern edge of the proposed Regional WWTP site in December 2013. This location was recognized as an active nest that fledged young bald eagles in summer 2014. Bald eagles are no longer listed as a federal endangered or threatened species under the Endangered Species Act, but are still afforded protection under the Bald and Golden Eagle Protection Act (BGEPA) and Migratory Bird Treaty Act (MBTA). In addition, this species is listed as a threatened species in New York by the NYSDEC. Therefore, disturbance, or "take" of the bald eagles would require permit authorization from both USFWS (non-purposeful take permit under 50 CFR 22.26) and NYSDEC (Incidental Take Permit under 6 NYCRR Part 182 (Environmental Conservation Law 11-0535)).

It is highly unlikely that the Proposed Action will result in the loss of bald eagles in the area. Additionally, the Proposed Action will not result in the direct loss of nesting habitat for the bald eagle, though the proposed Regional WWTP is anticipated to be visible from the active nest location, particularly during fall and winter (leaf-off). Provisions have been incorporated into the project to avoid direct visual impacts during construction and to minimize long-term visual impacts during operation of the WWTP (post-construction). Greater discussion on the potential significant adverse impacts to the bald eagle pair and the active nest location are included under item 3.7.j., below. Mitigation measures proposed to avoid and minimize potential impacts are also included under that item.

Northern Long-Eared Bat

In October 2013, the USFWS announced its intention to add the northern long-eared bat (*Myotis septentrionalis*) to the endangered species list, pending a 12 month review, which has since been extended by an additional 6 months. This species is therefore considered a candidate species, and the proposed Regional WWTP and access road falls within the species' range. The WWTP location contains mature deciduous forest with open understory, and is located proximal to wetlands. Some trees on site contain dead and dying limbs, and there are snags among the live trees on the site with diameters at breast height (DBH) greater than three (3) inches. As such, the WWTP location provides potential habitat and roosting structures for northern long-eared bat,

although there are no confirmed roosts on or adjacent to the parcel. All tree clearing activities that will be required to construct the Proposed Action facilities will be confined to the period between October 1 and March 31, when northern long-eared bats are in hibernation (USFWS, 2014). This measure will avoid direct take of northern long-eared bats, and since there are no confirmed roosts on the site, the Proposed Action will have no effect on this species.

Listed or Rare Species

A request to the NYNHP for extant state records of listed or rare species on or near the Proposed Action locations yielded a list of the following species:

- Least bittern (*Ixobrychus exilis*) – NYS threatened
- Pied-billed grebe (*Podilymbus podiceps*) – NYS threatened
- Long-tailed salamander (*Eurycea longicauda*) – NYS special concern
- Marsh horsetail (*Equisetum palustre*) – NYS threatened
- Nodding wild onion (*Allium cernuum* var. *cernuum*) – NYS threatened
- Leedy's roseroot (*Rhodolia integrifolia* ssp. *leedyi*) – NYS endangered

NYNHP also provided older historic records of the following species, which have not been confirmed since the 1800s:

- Leiberg's panic grass (*Dichanthelium leibergii*) – NYS endangered – last record: 1832
- Northern wild comfrey (*Cynoglossum virginianum*, var. *boreale*) – NYS endangered – last record: 1881.
- Spreading globeflower (*Trollius laxus*) – state rare species – last record: 1857.

Field surveys were conducted in June 2013 to identify plant and animal species observed on the proposed Regional WWTP site, and to note the presence and quality of habitat areas on and surrounding the site. These field results were based on a pedestrian visual/aural encounter survey conducted during the wetland delineation field effort. This survey resulted in a list of observed species, which did not include any of the species listed by NYNHP or USFWS, though the list of observed plant species is not necessarily exhaustive.

Least bittern and pied-billed grebe are generally found in emergent marsh wetlands with open water. Neither species tends to stray far from the water's edge, as they nest, roost, and forage in flooded open marsh habitats. The proposed Regional WWTP site is located in a mature wooded upland area, with at least 150 feet of floodplain forest buffer between the WWTP facility and the edge of Wetland MF-1 (presumably the perimeter of the Catharine Creek Marsh).

Pied-billed grebes nest in floating vegetation nests anchored in open water near emergent vegetation (Ehrlich, *et al.* 1988, Levine (Ed.), 1998, Baicich and Harrison 2005). The nearest such habitat to the proposed Regional WWTP is located more than 300 feet east of the eagle nest, at least 600 feet from the proposed Regional WWTP footprint. Therefore, there is at least 150 feet of mature floodplain forest with dense understory (to be supplemented by additional plantings) and at least 340 feet of dense emergent marsh between the proposed Regional WWTP and suitable nesting or foraging (open water) habitat to support pied-billed grebes. Since lighting, noise, and human activity at the WWTP have been minimized and confined to the west side of the WWTP parcel, operations at this facility are not likely to adversely affect pied-billed grebes.

Least bitterns prefer to nest in cattail-bulrush emergent marsh habitat (Levine (Ed.), 1998), also near open water. This species also predominantly forages in open water. The nearest wadable open water to the proposed Regional WWTP facility is located just over 300 feet to the east of the eagle nest, which is at least 600 feet east of the proposed Regional WWTP footprint. Again, since light sources, sound, and human activity have been minimized and confined to the west side of the WWTP parcel, these factors are not likely to disturb or adversely affect least bitterns, as there is at least 150 feet of floodplain forest buffer and at least 340 feet of dense emergent marsh between the proposed Regional WWTP and the bittern's preferred open water habitat.

The *long-tailed salamander* is found in rocky talus streambeds and plunge pools, such as those found in the tributary streams along the fjord walls to the east and west of the Catharine Creek/Seneca Lake/Barge Canal floodplain. Such habitats are not found within or immediately adjacent to the Proposed Action locations; therefore, this species is not likely to be adversely affected by the project.

Marsh horsetail is a wetland plant typically found along stream banks in wet meadows and shallow emergent marshes. The proposed Regional WWTP parcel does not contain these types of habitats. Marsh horsetail was not identified during the 2013 field surveys.

Nodding wild onion is found in dry rock outcrops, prairies, and dry woods, such as those found to the east of the proposed Regional WWTP site, along Rock Cabin Road. The proposed WWTP site consists of wooded upland, but would not be considered a dry woods (it is a floodplain forest). No evidence of this plant was identified during field surveys conducted on and adjacent to the site. The Proposed Action therefore will adversely affect this plant.

The only known extant population of *Leiberg's panic grass* in New York State is located in an opening in dry woods in a cemetery in the city of Troy. The record from

Schuyler County is historic in nature, dating from the 1830s. This species typically grows in prairie habitats and in dry woods. As noted above, the subject site is a floodplain forest woodlot. No sign of this grass was detected during field surveys; its presence within the larger Catharine Creek Valley is not likely. The Proposed Action will therefore adversely affect this plant.

Historically (pre-1900), *northern wild comfrey* was found throughout New York State, but it has contracted its range to the north, and is no longer found south of the Adirondack Region. The record of this plant for Schuyler County is from the 1880s. This species no longer occurs that far south in New York, so no adverse impacts will occur to this species as a result of the Proposed Action.

Spreading globeflower populations have been documented within central New York State, which is considered an important region for the species' long-term conservation. This species grows in calcareous wetlands and pastures, as well as in clearings in rich shrub swamps, seepage areas, evergreen swamps, and in sloping fens. While the proposed Regional WWTP site is categorized as a moist woodlot, no sign of this plant was detected during the 2013 field surveys, which were conducted at a time of year when both the flowering and fruiting bodies of the plant would have been evident. The presence of this species within the proposed WWTP parcel or other project locations was not identified; therefore, this plant species will not be adversely affected by the Proposed Action.

3.7.f. The Proposed Action may result in the removal of, or ground disturbance in, any portion of a designated significant natural community. Small impact may occur.

The Natural Heritage Program reported that a significant natural community is located within or near the proposed Regional WWTP and associated infrastructure. Tree and understory species found within portions of the site are typical of a *floodplain forest community*, though much of the understory is dominated by non-native invasive species such as European buckthorn (*Rhamnus cathartica*) and tartarian honeysuckle (*Lonicera tatarica*). Therefore, while the Proposed Action is within this S3 ranked cover type (S3 = state ranked vulnerable to extirpation), and while the project will impact a portion of adjacent emergent marsh, it is not a prime example of this community type due to the dominance of non-native invasive plant species. The Proposed Action will result in the unavoidable loss of less than 4.8-acres of floodplain forest habitat, comprised of the area generally bounded by the proposed Regional WWTP perimeter fence and western vegetative boundary.

This loss is not considered to result in a significant adverse effect to the environment because the loss will occur in a disturbed site and in an area where this community is already highly fragmented and the quality reduced by a dominance of invasive vegetation (the Regional WWTP is sited within the NYSCC historic UDS – the area has

been filled with dredge spoils from the Barge Canal). Forested cover will be unimpacted and maintained to the extent possible. A strip of existing and planted woody vegetation will be maintained along the east of the Regional WWTP site to maintain the continuity of the cover type, while providing a visual screen for the Plant and while enhancing the use of this area as a travel corridor for wildlife. A large portion of the floodplain forest community will remain intact and undisturbed; therefore, the project will not result in severe degradation or fragmentation of this forested cover type in this area.

3.7.g. The Proposed Action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site. Small impact may occur.

The predominant species that utilize the Proposed Action locations are common to the Finger Lakes Region and to New York State. Examples of such species (as identified on Part 1 of the FEAF) include white-tailed deer, raccoon, striped skunk, American goldfinch, common yellowthroat, and the yellow warbler. The presence of and use by migratory birds of the area has been documented. The proposed Regional WWTP will impact 4.8 acres of currently vegetated land. The impacted lands consist of deciduous forest (dominated by European buckthorn) and upland meadow (dominated by reed canary grass). These vegetative communities and the habitat components that they offer can be found in abundance on lands surrounding the WWTP parcel. As further benefit, much of the adjacent lands are owned by the NYSDEC and are provided additional protection as a Wildlife Management Area (WMA) (see Figure 9). The removal of vegetation necessary to construct the proposed Regional WWTP and the associated access road will be completed during the predominant non-breeding season for songbirds (October – March).

3.7.j. The Proposed Action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the adjacent pair of nesting bald eagles. Moderate to large impact may occur.

The proposed Regional WWTP site has been configured to avoid construction of permanent structures within 450 feet of the active bald eagle nest site to minimize and/or avoid potential long-term visual and noise impacts to the eagle's nest. The layout of the site has been massaged multiple times to propose a footprint that would have the least amount of impact on the eagle pair, the nest location, and the surrounding environment in general. Design options such as limiting the Headworks/Control Building to one (1) story and rearranging the WWTP site elements to be more linear, are just a couple examples of how the Proposed Action has been modified to avoid and minimize significant adverse environmental impacts, to the extent possible. Additional site selection and site layout details are included in Appendix B.

Due to the size and configuration of the WWTP and associated project components, temporary construction activities and construction of permanent infrastructure cannot be avoided within 660 feet (200 m) of the bald eagle nest. The short-term, long-term, temporary, and permanent impacts that the proposed project may have upon the eagle pair and their nest location have been considered. Peter Nye, a retired NYSDEC bald eagle biologist, completed an assessment of potential impacts on the eagles from the proposed Regional WWTP. This assessment, provided in Appendix E, included an analysis of how the eagles may be affected and a suggested list of potential measures that could be implemented to avoid and/or minimize impacts to the eagle pair. Mr. Nye's assessment suggested that construction activities within 660 feet of the nest and the continued operation of the WWTP facility would likely disturb the eagles and possibly result in nest abandonment. He further indicated that while the eagles might abandon this specific nest location, he believes that they are year-round residents of the Watkins Glen area and anticipates that they would remain on or very near their established territory. In addition, Mr. Nye has indicated that abandonment of the existing nest location, if it were to occur, may only be temporary, and the eagle pair may move back and re-use the location in the future.

Loss of bald eagles or a reduction in eagle populations within the region are not anticipated outcomes of the Proposed Action. At this point, a likely scenario is that the construction and operation of the WWTP will result in the abandonment of the existing nest location, which would be anticipated to result in the potential loss of a breeding season for the pair of eagles. A conceptual Net Conservation Benefit Plan (NCBP) has been drafted to establish a list of mitigative actions, which when cumulatively reviewed, would avoid and/or minimize potential impacts to the pair of bald eagles, resulting in a positive conservation benefit for the species. These actions are summarized as follows:

- The proposed Regional WWTP looks to improve the water quality within the Watkins Glen/Montour Falls area. Improved wastewater treatment infrastructure will benefit Seneca Lake and its surrounding ecosystems and the wildlife they support.
- No direct impacts to the active nest location will occur. The nest will remain for potential return and re-use by the pair of eagles in the event that they do, at least initially, abandon this nest location.
- The posting of "No Trespassing/Restricted Area" signage will be installed along the northern, western, and southern property boundaries of the WWTP parcel to minimize human activity and disruption within the 660-foot nest buffer area.

- Site preparation activities will be initially staged to occur during the eagle's non-breeding season (mid-September – December) during 2014 and 2015. The bulk of proposed construction and ground disturbance activities would not begin until the non-breeding season in 2016; after that point, construction of the site would continue until work is completed (year-round construction). Site survey and soil boring activities were successfully completed during the 2014 non-breeding season, along with construction of a nesting platform (further detailed below).
- During the 2015 non-breeding season, temporary construction screening will be installed along the eastern boundary of the WWTP parcel to provide additional visual screening from the nest location. This screening will consist of an opaque fencing that will block the line of sight from the existing nest to a height of 15-25 feet off the ground. This fencing will be installed outside of the 330-foot nest buffer. This temporary screening will be replaced, as needed, by a permanent vegetative buffer of fast-growing conifers.
- The construction of an artificial nesting platform was completed during the 2014 non-breeding season. This platform was installed in a cottonwood tree located approximately 0.7 miles south of the existing nest location (within the Catharine Creek Marsh and WMA). Installation of this platform provides the pair of eagles a potential alternate nesting location, should they abandon the existing nest. Peter Nye oversaw the design, planning, and installation of this feature. Details of the platform construction are provided in a report produced by Mr. Nye, and included in Appendix E. Despite reservations from the NYSDEC regarding the potential success of this action, the use of artificial nesting platforms by bald eagles within New York State has been well-documented. A review of the use of artificial nesting platforms for bald eagles in New York State was prepared by Peter Nye and is also available in Appendix E.
- Post-construction monitoring of eagle activity near the WWTP site and within the Catharine Creek WMA will be completed annually in the spring. Annual reporting to the NYSDEC will be completed.
- Coordination with the Finger Lakes Land Trust (FLLT) is underway to locate an active bald eagle nesting location in the Finger Lakes Region that is susceptible to development or other pressures and requires preservation. The objective of this action is to provide monetary assistance to help protect an active nest location and conserve bald eagle habitat, which would provide a positive conservation benefit to the species within the Finger Lakes Region. Additional details will be finalized regarding this approach as coordination with the FLLT, NYSDEC, and USFWS continues to develop.

Collectively, along with the WWTP site modifications that have been completed, these actions will avoid and minimize potential significant adverse impacts to the bald eagles. Impacts or disruptions that may still occur as a result of the Proposed Action have also been considered. Mitigative elements have been included in the NCBP to ensure that a net conservation benefit for regional populations of the bald eagle is realized through this process.

3.8. Impact on Agricultural Land Resources

The Proposed Action will not impact agricultural resources.

3.9. Impact on Aesthetic Resources

3.9.a. Proposed Action may be visible from any officially designated federal, state, or local scenic or aesthetic resource. Small impact may occur.

3.9.c. The Proposed Action may be visible from publically accessible vantage points: seasonally and year-round. Small impact may occur.

3.9.d.ii. The situation or activity in which viewers are engaged while viewing the Proposed Action is recreational or tourism based activities. Small impact may occur.

3.9.e. The Proposed Action may cause a diminishment of the public enjoyment and appreciation of the designated aesthetic resource. Small impact may occur.

The proposed Regional WWTP, pumping stations, and portions of the force main will be installed directly adjacent to or near the Barge Canal and residential areas. These areas are in the vicinity of several recreational uses, including boating on the Barge Canal, hiking and biking along the Catharine Valley Rail Trail (north of the high school in Watkins Glen), sports at the high school ball fields across the Canal, and nature observation and hunting in the Catharine Creek Marsh. The proposed pumping stations will be located on previously developed parcels, so the alteration of views at these locations is minimal and not significant. The proposed force mains will be located below ground, so visual impacts associated with these installations are limited to construction and site restoration activities. The proposed Regional WWTP and segments of the associated access road are the only above-ground components of the Proposed Action that will be built on currently undeveloped land.

The Regional WWTP will be located on an undeveloped parcel along the east side of the Barge Canal. The relative size and use of the proposed facility represents a new land use in its proposed location that will contrast with its surrounding landscape; however, this land use is not new to the general area and Seneca Lake watershed. The Plant may have a visual impact on surrounding properties and the general viewsheds associated with the adjacent road networks and recreational activities in the area. These potential visual impacts may be noted seasonally or year-round depending on the location and

vantage point of the viewer. Elements have been incorporated into the Proposed Action to limit potential negative visual impacts and to maximize the public's enjoyment and appreciation of the surrounding natural resources and recreational opportunities.

Temporary visual impacts to this area will include the presence of construction equipment, materials, signage, and staging areas in the construction zone, which will alter the viewshed of the immediate area during the construction period. Temporary visual impacts will be mitigated as follows:

- Minimize limits of clearing for construction and maintain existing screening and vegetation along the Barge Canal to the greatest extent practicable;
- Limit construction staging, stockpiling, and storage areas to areas away from the Barge Canal;
- Reduce light and glare impacts from temporary construction and buildings by shielding light sources to project light below the horizontal plane, and by putting external light sources on motion sensors, so that they are not continually illuminated; and
- Restore landscapes disturbed by construction-related activities to pre-construction conditions and install a 15 to 20-foot tall opaque fence between the WWTP site and the Catharine Creek Marsh to the east. As previously mentioned, this temporary fence will help screen the site from the adjacent bald eagle nest during construction activities.

Long term visual impacts will be offset by screening the Regional WWTP from the land uses to the west with woody plantings that will provide fast growth and a dense growth habit (e.g., Norway spruce). This will screen the view of the WWTP from the Canal, the school, and from the Catharine Valley Rail Trail. An undisturbed vegetated buffer will remain to the east of the facility, and will be supplemented by the installation of a permanent woody vegetation screen in areas of meadow/field communities. Existing woody vegetation will remain to the extent practicable. This vegetated buffer will permanently screen the WWTP from the viewpoint of the Catharine Creek Marsh and viewpoints along Rock Cabin Road. This buffer will be located outside the 330-foot buffer from the active bald eagle nest; supplemental plantings will be completed during the bald eagle non-breeding season (mid-September – December).

WWTP buildings will be of a neutral, earth-tone color, to blend with natural backgrounds, and rooflines will remain below tree-top height. Exterior finishes and building architecture and roofs will resemble those found in the area, perhaps resembling a marina type facility or similar nautical use facility. The resulting effect will be that the completed project will blend with its surroundings and will be largely screened from surrounding viewpoints. The revised WWTP building layout consists of a one-story Headworks Building that will further reduce the views of this facility from

surrounding locations and will avoid impacts to aesthetic resources to the extent practicable.

3.10. Impact on Historic and Archaeological Resources

3.10.b. The Proposed Action may occur wholly or partially within, or substantially contiguous to, an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory. Small impact may occur.

3.10.c. The Proposed Action may occur wholly or partially within, or substantially contiguous to, an archaeological site not included on the NY SHPO inventory. Small impact may occur.

Review of the NYS Office of Parks, Recreation and Historical Preservation's (NYSOPRHP) online Geographic Information System for Archaeology and National Register tool indicated that the Proposed Action, in its entirety, is located in an archaeologically sensitive area (see Figure 8). Consultation with NYSOPRHP (as provided in Appendix A) further identified potential areas of archaeological concern within the general area, and recommended that a cultural resource survey be performed.

Alliance Archaeological Services has completed a Phase 1A literature review for the Proposed Action (see Appendix F), though some elements of the project have since been modified and relocated. The Phase 1A report (Alliance Archaeological Services, 2014) documented the following findings:

- The Watkins Glen Force main route is within previously disturbed and artificially built-up railroad beds and, as such, has a low potential for significant archaeological deposits.
- The proposed Regional WWTP and access road are located in areas of very poorly drained alluvial soils or previously significantly disturbed soils, and therefore have a very low potential for significant archaeological deposits.
- Proposed construction of the Montour Falls pump station is within the existing previously disturbed Montour Falls WWTP site and has a low potential for significant archaeological deposits.
- Sections of the Watkins Glen and Montour Falls force mains located on the Watkins Glen Central High School property are within variable drained alluvial soils. Depending on the depth of disturbance in these locations, the potential to impact deeply buried archaeological deposits may exist. The Phase 1A recommends shovel test pits be hand-excavated every 50 feet once a final alignment has been established for these areas.

An additional area of investigation was associated with the installation of the Montour Falls force main along the west side of the Barge Canal. This route has since been modified and is now proposed to parallel the east bank of the Canal from the Montour Falls Pump Station to the proposed Regional WWTP. The additional literature review and fieldwork associated with this design change will be completed during recommended Phase 1B activities. As noted above, the proposed project area generally has a low potential for impacting archaeological deposits. The recommended Phase 1B testing will be completed for the portion of force mains along the high school property and portions of the Montour Falls force main that fall within well-drained alluvial soils. Force main routes will be adjusted to avoid any areas of archaeological significance that may be identified through the Phase 1B site investigation. All archaeological tests and reports will be submitted to the NYSOPRHP for review. Their recommendations on how to avoid or minimize potential adverse impacts to archaeological resources, if any, will be followed during project design and construction.

The NYSDEC will be initiating contact with interested Indian Nations in accordance with their Commissioner's Policy 42 – Contact, Cooperation, and Consultation with Indian Nations. Completed archaeological investigation results and reports will be supplied to all Nations, upon advisement, as part of ongoing tribal coordination needs related to the Proposed Action. The NYSOPRHP and USACE may also participate in the tribal coordination efforts to be completed for this project.

3.11. Impact on Open Space and Recreation

3.11.a. The Proposed Action may result in an impairment of natural functions, or "ecosystem services", provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat. Small impact may occur.

3.11.b. The Proposed Action may result in the loss of a current or future recreational resource. Small impact may occur.

The Regional WWTP is located on a site currently used for hunting and nature observation purposes, located at the edge of the 890-acre Catharine Creek Wildlife Management Area (WMA). The proposed fenced Regional WWTP site will occupy a relatively small footprint (4.8 acres) within the much larger WMA; a significant reduction in open space or recreational lands will not occur. The Catharine Creek Marsh Complex will experience minimal wetland fringe impacts as a result of the proposed access road; these impacts are located outside of the WMA limits and will not have a significant effect on the portions of the marsh complex located within the recognized WMA. The recreational opportunities available within the WMA (hunting,

fishing, trapping, hiking, boating, bird watching, and nature study) will still be available year-round (in accordance with state regulations and guidelines that apply to some of the activities).

Potential recreational impacts that may occur as a result of the Proposed Action include a reduction in the available area for archery hunting, both by reducing available natural habitat and through restricting the discharge of a long bow within 150 feet and discharge of a crossbow within 250 feet of the WWTP building (public structure). This represents a very small reduction in available hunting area, and does not significantly limit archery hunting opportunities within the larger Catharine Creek Marsh/Catharine Creek WMA. The discharge of firearms within the Village of Watkins Glen municipal boundary is prohibited; therefore, the Proposed Action does not impact hunting with firearms. As recently confirmed, the majority of hunting that occurs within the WMA is focused on the wetland habitat to the east of the site and along Rock Cabin Road. These access points will not be impacted by the Proposed Action. Recreational use of the Canal will not be impacted by the Proposed Action.

3.12. Impact on Critical Environmental Areas

3.12.a. The Proposed Action may result in a reduction in the quantity of the resource or characteristic which was the basis for designation of the CEA. Small impact may occur.

3.12.b. The Proposed Action may result in a reduction in the quality of the resource or characteristic which was the basis for designation of the CEA. Small impact may occur.

The proposed Regional WWTP will be located at the edge of the Catharine Creek Wildlife Management Area, which was designated as a Critical Environmental Area (CEA) by Schuyler County in January 2010 (see Figure 10). The basis of the designation was for the protection of plants and wildlife. The Catharine Creek Marsh Complex has also been identified by Audubon New York as a designated Important Bird Area (IBA). According to the *Important Bird Areas of New York* (Burger and Liner, 2005), the Catharine Creek WMA represents the last remaining headwater marsh in the Finger Lakes. The IBA was so designated because Catharine Creek Marsh is an important breeding area avians, such as least and American bitterns, sedge wrens, marsh wrens, soras, Virginia rails, and swamp sparrows (National Audubon Society, 1998). The preferred nesting habitats associated with these bird species focus on the extensive open water cattail marsh components of the CEA. The surrounding uplands provide a protective buffer for the marsh, as well as suitable habitat for other bird

species; however, these upland components are not the primary focus of the IBA designation or the CEA designation. The Catharine Creek Marsh has also been documented to support a variety of “at-risk” species, including the pied-billed grebe, prothonotary warbler, and the bald eagle.

The proposed Regional WWTP will disturb 4.8 acres of previously disturbed (filled) upland wooded habitat at the edge of the WMA/CEA/IBA. While this represents the loss of wooded habitat that supports local woodland and edge-oriented songbirds, such habitat is abundant in this region and throughout the Northeast. The acreage associated with the Proposed Action represents a minor loss that is not expected to have a measurable or significant effect on local bird populations or habitat availability. Further, the site plan for the Regional WWTP includes maintaining an undisturbed buffer between the WWTP and the open marsh (Wetland MF-1, limits included on Figure 5). The only direct wetland impacts will occur along the proposed route for the access road (0.22 acres).

The function of the WWTP to protect and improve water quality will provide a benefit to local waters on which wading and marsh-nesting birds depend. This project benefit looks to provide long-term and enhanced water quality protection, which supports the continued protection of plants and animals in the area. As such, the proposed project is not anticipated to significantly and adversely affect the functions and values for which the CEA was established. An insignificant decrease in the quantity of acreage currently included in the CEA designation will occur; however, no impacts on the quality of this environmental area are expected.

3.13. Impact on Transportation

The Proposed Action is not expected to result in a change to the existing transportation systems, as indicated by the EAF Part 2. Further analysis is provided below.

A component of the Proposed Action is to install an access drive parallel to the existing Yacht Club road, which will allow for vehicular access to the Regional WWTP. Though minimal, and limited largely to site personnel and necessary equipment and supply deliveries, an increase in traffic will occur at the Regional WWTP parcel, since no traffic currently accesses this area aside from NYCC maintenance crews. The decommissioning of the existing Watkins Glen and Montour Falls WWTPs will reduce traffic access needs and volumes around those two (2) locations. Combining these two (2) facilities will result in a cumulative reduction in traffic volumes related to WWTP maintenance and operation for the two (2) Villages. Combining resources will reduce traffic volumes within the residential/commercial/waterfront areas that surround the existing Village WWTPs.

3.14. Impact on Energy

The Proposed Action is not anticipated to cause an increase in the use of any form of energy.

3.15. Impact on Noise, Odor, and Light

3.15.a. The Proposed Action may produce sound above noise levels established by local regulation. Small impact may occur.

Many of the initial noises associated with the project would be a result of the associated construction activities including site work and facility construction, which will last approximately 22 months. These impacts, such as construction equipment noises, etc. would be short-term and temporary in nature, in relation to the long-term operation of the Regional WWTP.

Upon completion of the project, minimal impacts in regard to noise are anticipated. Noise impacts would primarily be those associated with limited additional traffic to and from the facility at the northwest corner of the site near the 660-foot eagle nest buffer, and any exterior mechanical building equipment, such as a ground-level back-up electrical generator located just inside this buffer off the southwest corner of the Headworks/Control Building. Additionally, the wastewater process equipment planned at the proposed Regional WWTP is necessary for the proper treatment of wastewater; however, this equipment does have the potential for generating some noise. Many of these components are contained within the influent and/or process buildings, with very few noise-generating process components located outdoors. The outdoor process items will be limited to the on-site backup generator.

There are several measures that will be utilized to mitigate nuisance noise levels from the Regional WWTP. The aeration system blower exhaust pipes will be insulated with sound attenuating material and/or silencers installed on the equipment. Alternatively, sound attenuation chambers could be constructed within each building to house the noise-generating equipment. Exterior equipment, such as the backup generator will include sound attenuating enclosures and will be positioned in the central portion of the site. The addition of supplemental vegetative screenings, in addition to the undisturbed forested buffers that already exist and will remain around the site, will also help to further dampen noise decibel levels.

The Proposed Action also includes the construction of two (2) pumping stations within the Villages of Watkins Glen and Montour Falls. Some noise will be associated with these pumping stations; however, the proposed locations of these facilities are the current Village of Watkins Glen and Village of Montour Falls WWTPs. Noises associated with operation of the WWTPs are common to

the surrounding area; the operation of the pumping stations is not anticipated to increase the noise generated at these sites. The pumping station generators will be located outside and will include a sound-attenuating enclosure to mitigate noise impacts to the surrounding areas. The construction of one joint WWTP facility will cumulatively result in the creation of less noise, when compared to the operation and management of two (2) separate WWTP sites.

3.15.d. The Proposed Action may result in light shining onto adjoining properties. Small impact may occur.

The proposed Regional WWTP and pumping stations will require minimal outdoor lighting during operation and maintenance activities. Certain design features will be implemented to minimize the potential impacts of the outdoor lighting on the surrounding areas.

The following items are proposed to minimize the potential for light impacts:

- Use source shielding in exterior lighting at the Regional WWTP and pumping stations to ensure that light sources (such as bulbs) are not directly visible from residential areas, the Barge Canal, and adjacent streets. Source shielding will also limit spillover light and glare onto adjacent residential areas. Source shielding at the Regional WWTP will also help avoid light pollution impacts to wildlife in the surrounding Catharine Creek Marsh Complex and adjacent upland areas.
- While these facilities will continuously be in operation, they are not manned twenty-four hours a day/seven (7) days a week. Therefore, motion sensors or timers will be employed on the outdoor light fixtures at the Regional WWTP and pumping stations to minimize lighting periods to when personnel are accessing the facilities.

3.15.f. The Proposed Action may emit intermittent odors. Small impact may occur.

There will be occasional odors generated by the proposed Regional WWTP and the pump stations, as with all such facilities. However, it is believed that odors would be minimal and may fluctuate depending upon facility process conditions and climatic conditions. Inclusion of odor control treatment systems for both pump stations and the WWTP, coupled with good housekeeping at the facilities, will minimize and/or avoid the development of odors. When odors do develop, there are several steps that can be taken to control them. The construction of one joint WWTP facility will cumulatively result in less odor emissions and more efficient processing, when compared to the operation of two (2) separate WWTP sites.

The following items will be implemented to avoid and minimize significant odor impacts:

- The first consideration for odor control, as well as effective wastewater treatment, is the usage of aerobic processes throughout the facility. Aerobic processes incorporate the injection of air into the wastewater, thereby reducing the likelihood of the wastewater becoming septic. Aerobic processes minimize the production of sulfide compounds and gases that are the prime sources of wastewater odors. As the wastewater moves through each aerobic process component at the proposed Regional WWTP, the wastewater and sludge becomes more stable and will produce fewer odors.
- An odor control system will be installed at the WWTP to minimize odors from the Plant's Headworks and solids dewatering buildings.
- Other odor control design components that are being implemented as part of the proposed Regional WWTP include an enclosed grit removal and washing system and a scum removal system.
- In addition to the many design-oriented odor control measures, there are many operational techniques that can be easily implemented to minimize and control odor problems at WWTPs. These operational changes include: 1) prevention of overloading on plant processes, 2) maintaining an appropriate aeration rate in biological treatment processes, 3) expediting solids inventory and sludge backlog to the belt press, 4) increasing frequency of sludge and scum removal, grit and screenings, and other odorous accumulations, 5) adjusting chemical treatment to various treatment components, and 6) controlling the release of process odors, through the use of topical water spray to minimize foaming conditions. The implementation of these measures will be considered, where applicable.

3.16. Impact on Human Health

3.16.a. The Proposed Action is located within 1500 feet of a school, hospital, licensed day care center, group home, nursing home, or retirement community. Moderate to large impact may occur.

The proposed Regional WWTP would be located across the Barge Canal from the Watkins Glen Central High School, a distance of approximately 600 feet to the perimeter of the baseball field (approx. 1,300 feet to the school building itself). This element of the FEAF serves to identify sensitive receptors that may be located near proposed project, particularly those that may have an impact on the adjacent properties. The proposed Regional WWTP will be small in footprint and located across the Barge Canal from the School, limiting any direct impacts of the project. As detailed previously, noise, visual and lighting impacts will be minimal. This document outlines

the various measures that will be incorporated into the project to avoid and minimize, to the greatest extent practicable, any adverse effects that may result from the Proposed Action.

The influent force main from the Watkins Glen pump station is proposed to skirt the perimeter of the high school's athletic fields and will cross the Barge Canal from the banks of School property. This force main will be installed underground; the only impacts from this project element will be temporary noise and soil disturbance experienced during the force main installation. This work would be completed during days and/or hours when the School is not in session to limit potential disruptions.

Certain conditions within the collection and treatment areas do have the potential for the buildup of explosive gases, low oxygen levels and elevated levels of hydrogen sulfide gases which present a potential health & safety risk to sewer operators. Gas detection will be provided at the Headworks facility, at each pump station, and within any wet wells or underground vaults in order to detect any potential explosive gases, hydrogen sulfide (H₂S), or low oxygen conditions in these locations. In addition, exhaust fans will be installed to ventilate these areas for safe access. All sewer facilities will be provided with perimeter fence lines and access gates to reduce and limit access for public safety.

3.16.m. The Proposed Action has adequate control measures in place to ensure that the use and storage of non-hazardous chemicals will be protective of the environment and human health. Small impact may occur.

The proposed Regional WWTP, pumping stations and sewer system will not use any hazardous chemicals or materials. The odor control chemical, bioxide, which may be used at the pump stations, is non-hazardous. The storage of polymer for sludge dewatering and alum or ferric chloride for chemical precipitation of phosphorus during wastewater treatment may occur on site. Use and storage of any bulk chemicals required as part of the wastewater treatment process will be in accordance with applicable state regulations. Safe storage of any non-hazardous chemicals will occur within the Headworks Building, which will only be accessible to WWTP personnel.

3.17. Consistency with Community Plans

3.17.a. The Proposed Action's land use components may be different from, or in sharp contrast to, current surrounding land use pattern(s). Small impact may occur.

The Proposed Action is consistent with the Village of Watkins Glen's and the Village of Montour Falls' Comprehensive Plans. Each Villages Plan notes the opportunity to consolidate wastewater treatment facilities in a location between the two (2) Villages. The Comprehensive Plans for both Villages are available for review on their respective websites: Watkins Glen (<http://www.schuylercounty.us/DocumentCenter/View/1534>)

and Montour Falls (<http://villageofmontourfalls.com/wp-content/uploads/2012/06/Comprehensive-Plan-Final2.pdf>).

In the immediate area, the proposed Regional WWTP may not be the best visual fit with the surrounding environment; however, other larger developments and facilities are located only a short distance from the site. The siting of the proposed Watkins Glen and Montour Falls pump stations takes advantage of existing impervious area and treatment facilities within both communities, limiting the amount of new development included as part of the Proposed Action.

3.18. Consistency with Community Character

3.18.d. The Proposed Action may interfere with the use or enjoyment of officially recognized or designated public resources. Small impact may occur.

3.18.f. The Proposed Action is inconsistent with the character of the existing natural landscape. Small impact may occur.

The Proposed Action includes the construction/modification of a one-story WWTP and two (2) pump stations. The proposed buildings will be typical of the existing structures that are visible along the Barge Canal, including the existing Watkins Glen and Montour Falls Yacht Club boat houses, the Wal-Mart, the Watkins Glen Central High School, and other commercial and industrial developments within both Villages. The proposed Regional WWTP, as previously discussed, will include natural vegetation screening and differential site grading to further shield it from the surrounding areas and Barge Canal boat traffic. Further details were previously included on the Proposed Action's potential impact to aesthetic resources.

In addition, the removal of the existing Village of Watkins Glen WWTP from the Seneca Lake waterfront will create a significant positive impact on the character and aesthetics of the south shore of the Lake. Relocation of the WWTP creates an opportunity to recapture the economic value of the land and will allow for additional public access of this key community recreational and water resource.

Decommissioning of the Montour Falls WWTP also creates an opportunity to remove unsightly treatment facilities from the key entry way to the Barge Canal in Montour Falls and to improve the character of this area. The proposed concrete wet-weather storage tank, included as part of the Montour Falls pump station, will be recessed with the majority of its height buried. Additional land at this facility location will be reclaimed through vegetative seeding, effectively converting the existing open, paved lagoon to a restored grass area.

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