



September 1, 2021

SUBMITTED VIA E-MAIL

Mr. John A. Bonafide
Director, Technical Preservation Services Bureau
New York State Historic Preservation Office (NY SHPO)
P.O. Box 189
Waterford, New York 12188-0189

**Re: It's Greener Now, LLC – Padua Gravel Pit
Padua Gravel Pit Expansion / Project ID: 06PR01547
Response to NY SHPO Request for Additional Information
JMT Job No. 16-S0157N-001**

Dear Mr. Bonafide:

JMT of New York, Inc., on behalf of It's Greener Now, LLC (IGN), submits the following in response to the NY SHPO/OPRHP Request for Additional Information, as outlined in your letter, July 2, 2019 for the above referenced site. For ease of review, NY SHPO/OPRHP comments are repeated below in *italics*, followed by IGN's responses.

Comment: *In reviewing this project, we noted that the newly proposed mine expansion will bring the commercial operations up to the boundary of Watkins Glen State Park. The park was designated eligible for inclusion in the New York State and National Registers of Historic Places in 2016. The park has been used by recreation seekers since the mid-19th century and remains today one of the state's most scenic destinations.*

Section 14.09 (NYSRHP) states: "Generally, adverse impacts occur under conditions which include but are not limited to (a) destruction or alteration of all or part of a property; (b) isolation or alteration of its surrounding environment; (c) introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting; or (d) neglect of property resulting in its deterioration or destruction."

Our office is particularly concerned with section (c) above and the specific impacts to the park that might arise from the mine expansion. We found no assessment of anticipated increases in noise, dust, vibration, truck traffic or other direct and indirect impacts that the expansion of this extractive industrial would have on the historic park.

It is our belief that an expansion of the mining operation up to the boundary of the state land has significant potential to adversely impact the historic character of the park. As such, we are requesting that an assessment of these factors be provided to this office as part of a more comprehensive alternatives analysis. This study should assess efforts that would avoid or minimize such impacts.

Response: As identified by your office, the existing mine area currently abuts the Watkins Glen State Park property and will continue to do so as the mine expands. However, as operations expand, mining excavation operations will be moving further away from the Watkins Glen gorge. While the overall acreage of the mine will increase over the life of the project, the total disturbed area (active mining excavation area, previously mined un-reclaimed areas, and processing areas) will be minimized by employing concurrent reclamation practices and by limiting stripping activities in advance of mining. As operations progress, there will not be a significant increase in the mine's

production rate. Furthermore, the proposed mining modification will not result in a significant change from previously permitted historic operations.

Please note, a draft Environmental Impact Statement (dEIS) was developed by JMT in May 2019 to satisfy the requirements of the State Environmental Quality Review Act (SEQR) for the proposed mine expansion. The dEIS was prepared in accordance with 6 NYCRR NYCRR 617.9(b) to address those potential impacts identified in the draft Environmental Impact Statement (dEIS) Final Scoping Outline, dated August 18, 2008. NYSDEC has been designated as the lead agency. The dEIS prepared in 2019 evaluated the likelihood and significance of the potential environmental impacts and outlines mitigation measures, where appropriate, to resources including: geological resources, ecological resources, water resources, visual resources, and cultural (historic and archaeological) resources.

NYSDEC reviewed the submitted dEIS, and has issued two response letters, dated May 22, 2019 and July 19, 2019, respectively requesting information. To address the comments contained within the letters, JMT revised the dEIS documents, including the noise projection analysis and visual impact assessment. Dust, vibration, and truck traffic impacts are outside of the scope of the dEIS, per the 2008 Final Scoping Outline referenced above. However, the Mined Land Use Plan (MLUP), which is included as Appendix F in the dEIS, includes a section for potential impacts from dust as well as traffic. The MLUP is included as part of the dEIS as it provides a summary of the mining and reclamation plans for the mine site.

Consistent with current excavation activity at the Padua Ridge Gravel Mine, standard industry equipment will be used to strip, excavate, and haul materials from bank faces. Bulldozers, scrapers, front-end wheel loaders, haul trucks and other standard industry equipment will be used as needed to accomplish each task. There is no proposed blasting.

For your reference, the 2019 dEIS has been uploaded to the CRIS site and IGN's response to the May 22, 2019 and July 19, 2019 NYSDEC letters (which includes the updated dEIS documents) are in the process of being uploaded.

We trust that the information contained herein adequately addresses the items included in your letter, dated July 2, 2019. If you should have any questions or require further information, please do not hesitate to contact me at (518) 218-5925 or acarroll@jmt.com.

Sincerely,
JMT of New York, Inc.



Alexandra Carroll, GISP
Associate

Attachments

cc w/ att.: M. Wocjik, IGN
K. Roe, Barclay Damon
K. Carlson, NYSDEC
D. Carter, OPRHP
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