



DRAFT ENVIRONMENTAL IMPACT STATEMENT  
It's Greener Now, Inc. – Padua Ridge Gravel Mine Town of Dix, New York

---

# **APPENDIX K**

## **NYS OFFICE OF PARKS CORRESPONDENCE**



April 23, 2019

SUBMITTED VIA E-MAIL

Ms. Sloane Bullough  
Historic Sites Restoration Coordinator  
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  
Response to NY SHPO Request for Additional Information  
JMT Job No. 16-S0157N-001**

Dear Ms. Bullough:

JMT of New York, Inc., on behalf of It's Greener Now, LLC (IGN), submits the following in response to the NY SHPO Request for Additional Information, as outlined in your letter, November 20, 2017 for the above referenced site. For ease of review, NY SHPO comments are repeated below in italics, followed by IGN's responses.

*Before we can provide our comments, we will need more information to access the visual impact on the historic Grand Prix Road Course and the State Park. Please provide existing and proposed site plans for us to compare. Please also provide any other documentation that will help us understand how the setting at the .5 miles of the road course we are most concerned with will change. For example, we will need to know how the topography in this location will affect the setting and view. We recommend that the rural setting that is visible from the road course is preserved. Photos should be keyed to an existing conditions site plan and attached as a single PDF document to CRIS under "Attachments."*

*Please add the contact information for the Department of Environmental Conservation to the CRIS entry so that that person can be copied on all correspondence.*

A Mine Plan Map (Sheet 1), Reclamation Plan (Sheet 2), and Final Grade Profiles (Sheet 3) are included with this letter as Attachment A. Please refer to Attachment A for further details.

Additionally, to assess potential visual impacts of the proposed project, JMT conducted a topographic- and vegetative cover-based sight line assessment from representative, residential and/or publicly accessible vantage points located within the general area. The visual assessment includes a narrative, Line-of-Sight Profiles Location Map (Sheet 8), Line-of-Sight Profiles (Sheet 9), and a Photographic Log - all of which are included with this letter as Attachment B. The visual assessment discusses the Watkins Glen Grand Prix Road Course and concludes there would be no resulting visual impacts. Views of the site from the Road Course are nearly entirely

screened by topography (including existing screening berms) and vegetation, and any potential view from the Road Course of continued operation of the mine site would be consistent with current conditions. Please refer to Attachment B for additional details.

For ease of review, and per request, this letter and its attachments have been uploaded to the CRIS site. Contact information for Scott Sheeley, the NYSDEC Region 8 - Regional Permit Administrator has also been uploaded to the CRIS site and is as follows:

Scott E. Sheeley  
Regional Permit Administrator  
NYS DEC Region 8 Headquarters  
6274 E. Avon - Lima Road  
Avon, New York 14414  
Office no. 585-226-2466  
Direct no. 585-226-5382

We trust that the information contained herein adequately addresses the items included in your letter, dated November 20, 2017. If you should have any questions or require further information, please do not hesitate to contact me at (845) 204-9239 or acarroll@jmt.com.

Sincerely,

JMT of New York, Inc.

  
Alexandra Carroll, GISP  
Environmental Scientist

Attachments

cc w/ att.: M. Wocjik, IGN  
K. Roe, Barclay Damon  
E. Davidson, JMT



# Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ERIK KULLESEID  
Acting Commissioner

May 23, 2019

Mrs. Alexandra Carroll  
Environmental Scientist  
JMT  
19 British American Boulevard  
Latham, NY 12110 *via e-mail only*

Re: DEC  
Padua Ridge Sand & Gravel Mine (94.63 acres)  
Dix, Schuyler Co.  
06PR01547

Dear Mrs. Carroll,

Thank you for providing additional information regarding the project's impact on the Watkins Glen Grand Prix Road Course to the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law).

The project consists of the expansion of the existing sand and gravel mining operations. The additional materials you provided have resolved our concerns regarding the project's impact on the Road Course. However, the potential environmental impacts to New York State Parkland will need to be reviewed now. The project is adjacent to the Watkins Glen State Park, which is eligible for listing in the National Register. We have reached out to OPRHP Environmental Management Bureau and will communicate with you about the next steps.

Thank you for your patience in the review process. If you have questions, please contact me at 518-268-2158.

Sincerely,

Sloane Bullough  
Historic Sites Restoration Coordinator

---

**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • parks.ny.gov



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  
F. Bonn, OPRHP  
E. Davidson, JMT



# Parks, Recreation, and Historic Preservation

KATHY HOCHUL  
Governor

ERIK KULLESEID  
Commissioner

December 10, 2021

Mrs. Alexandra Carroll  
Environmental Scientist  
JMT  
19 British American Boulevard  
Latham, NY 12110  
*via e-mail only*

Re: DEC  
Padua Ridge Sand & Gravel Mine (94.63 acres)  
Dix, Schuyler Co.  
06PR01547

Dear Mrs. Carroll,

Thank you for providing additional information to the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law).

The project consists of the expansion of the existing sand and gravel mining operations. The additional materials you provided have resolved our concerns regarding the project's impact on the Watkins Glen State Park, which is eligible for listing in the National Register.

It is the opinion of OPRHP that the project will have No Adverse Impact on historic resources.

If you have questions, please contact me at [sloane.bullough@parks.ny.gov](mailto:sloane.bullough@parks.ny.gov).

Sincerely,

Sloane Bullough  
Historic Sites Restoration Coordinator

---

**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [parks.ny.gov](http://parks.ny.gov)