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Memorandum

To: Town of Southeast Planning Board
From: AKRF, Inc.
Date: March 22, 2023
Re: Brewster Yards Revised FEIS Completeness Review
cc: KG+D Architects

AKRF, Inc. has initiated its completeness review of the revised Final Environmental Impact Statement (FEIS), submitted on February 13, 2023, with subsequent revisions provided on March 21, 2023. The purpose of this completeness review is to determine whether the FEIS provides substantial responses to the public's comments and whether all relevant information is presented and analyzed in a complete and understandable format for the purpose of acceptance by the Lead Agency.

The Applicant provided a revised FEIS in response to informal completeness comments provided by AKRF. Comments from AKRF's December 1, 2022, December 7, 2022, and March 7, 2023 memos are recited below in *italics*; new and follow-up comments are provided in **bold**.

CHAPTER 1: DESCRIPTION OF THE PROPOSED ACTION

- FEIS Table 1-1 on page 1-5 lists "Bldgs – Small Showcase Field" at 256 sq ft. This building was not listed in DEIS Table 1-1 and it is not clear what this building is.*
Comment addressed. The "Bldgs – Small Showcase Field" is no longer an entry in the updated version of Table 1-1.
- Chapter 1 of the FEIS should contain an updated list of required approvals, with "blasting permit" as an approval required by the Town of Southeast Building Inspector added.*
Comment addressed.
- Response 1-2, in listing the green building standards the project will consider, states "Minimum indoor air quality (IAQ) performance – will use energy efficient HVAC systems." Use of energy efficient HVAC systems should be moved to the subsequent bullet regarding minimum energy performance. Measures considered regarding indoor air quality should be listed.*
Comment addressed.
- Response 1-4 should be updated to cross-reference the list of approvals to be added to Chapter 1.*
Comment addressed.

5. *Response 1-6 did not adequately address the concern within Comment 1-6 regarding how late on Sunday nights games would be played. There was concern expressed regarding a 10 pm closing time, and the FEIS still presents this same closing time. The response describes Sunday tournaments as ending with championship games. Given that the last Sunday game could be scheduled to start as late as 8:00 pm, it does not seem likely that championship games would just be cut off if they have not finished prior to 10:00 pm.*

Comment addressed.

6. *Response 1-9 should include a reference to Figure 1-2 to show the proposed location of the crosswalk.*

Comment addressed.

7. *The transcript contained an additional statement following what was included as Comment 1-13 that should have been included and addressed: "There are lots of reasons baseball is failing here."*

Comment addressed.

8. *Response 1-14 should include the proposed width of trees to be left as a buffer between the multisport field/stormwater basin and the Yarusso property.*

Comment addressed. The response now indicates the width of the tree buffer will be approximately 262 feet between the northern property line and the limits of grading for the multisport field and stormwater basins, with approximately 475 feet between the multisport field and the nearest house.

9. *Response 1-15 cross-references Response 1-13; however, it seems the cross-reference should have been to Response 1-14.*

3/7/23: Comment partially addressed. The response now cross-references Response 1-24 instead of Response 1-13. While Response 1-24 is somewhat applicable here, the Applicant may want to consider also cross-referencing Response 1-14.

3/22/23: Comment addressed.

10. *Response 1-18 should clarify that the EMT vehicle will be present on-site on weekends during the peak season only. As currently written, this response implies the EMT vehicle will be present at all times, which is inconsistent with Response 3-1.*

3/7/23: Comment partially addressed. Response 1-18 now includes "during the peak season" but still does not clarify that it is for weekends only. The last sentence of Response 1-18 should be updated for consistency with the edits to Responses 3-13 and 3-15 regarding location of the space for a temporary medical station.

3/22/23: Comment addressed.

11. *Response 1-22 should cross-reference Response 7-9 or otherwise discuss the lots to remain in Town ownership.*

Comment addressed.

12. *Response 1-23 should discuss whether there have been instances of crime associated with the Applicant's Mount Kisco facility.*

Comment addressed.

13. *Response 1-25 – given that two of the four sides of the building do not have exterior access, the rear side of the building should include emergency egress.*

No further comment. The Applicant has opted not to incorporate emergency egress along the rear side of the building.

14. Response 1-26 – the Applicant should either consult with the Brewster Fire Department regarding the location of tree plantings along the left (west) side of the building to minimize impacts to ladder truck access or should incorporate a stairwell/deck/landing along this side of the building.

No further comment. The Applicant has opted not to incorporate a stairwell/deck/landing along the left (west) side of the building.

15. Response 1-27 indicates “Placement of landscaping around the building will allow room for placement of ladders for firefighting.” This response should cross-reference the summary of the meeting with the Brewster Fire Department in Appendix B.

Comment addressed.

16. Response 1-29 should still note that the portion of the Town road adjacent to this parking lot is anticipated to be closed to traffic.

Comment addressed.

17. The revised text under the “Traffic and Parking” heading on page 1-11 is not an accurate statement and should be revised as follows: “An increase in recreational space in the building will incrementally increase the number of required parking spaces to accommodate the building users, from ~~345~~ 142 spaces to ~~344~~ 168 spaces for the recreation in building component. However, the total number of parking spaces proposed on the Site Plan (451 spaces) is greater than the number of spaces required...”

3/22/23: Comment addressed.

18. Based on the updated Drawing OP-1, the Maintenance Shed has been moved out of the front yard setback and is now combined with the Water Treatment Building. It should be confirmed that the sum of the two individual square footages listed in Table 1-1 (2,354 sf for the Maintenance Building, 225 sf for the Water Treatment Building) represent the total area for the new combined “Maintenance/Water Treatment Building.”

3/22/23: The square footages in Table 1-1 are sufficient for the purposes of FEIS completeness review. Further refinements to square footages will be handled during site plan review.

CHAPTER 2: LAND USE, ZONING, AND PUBLIC POLICY COMMENTS AND RESPONSES

19. Response 2-2 should provide details on the proposed amount of preserved natural and/or open space (percentage, acreage) as well as screening and/or other measures for visual continuity with adjacent sites.

Comment addressed.

CHAPTER 3: COMMUNITY SERVICES COMMENTS AND RESPONSES

20. In addressing the potential need for emergency services, Responses 3-1 states that “primary staff will be CPR and First Aid trained and certified.” The Applicant should clarify the number of staff members who are “primary staff,” certified in CPR and First Aid, and how many such members will be on-site during peak and off-peak times, in total and/or per field. Will there be any areas of patron activity where primary staff may be limited or unavailable? Will primary staff be equipped with devices to aid in administering emergency medical services?

Comment addressed. The Applicant indicated there will be one to four primary staff per field, in addition to two Certified Athletic Trainers overall during tournaments, and each staff member will be equipped with a means of direct communication with all other staff.

21. As described in Responses 3-1 and 3-12, the amount and extent of on-site emergency medically-trained personnel is based on the expected number of medical emergencies occurring at the facility. In turn, the expected number of medical emergencies is based on the Applicant’s 21 years of experience with

the ProSwing facility in Mount Kisco. In the previous version of Chapter 3 (11/2/22), the reported number of EMS calls from the Mount Kisco location was one call over 21 years. In the revised version (11/21/22), that number has been increased to an average of one EMS call per month, with eight calls over the approximately eight-month peak/summer season. Based on the increased patronage and activity during the peak season, it would seem that there would be a higher rate of calls per month than for the off-peak season. The Applicant should clarify whether the rate of one call per month is the same during the four months of the off-peak season, i.e., twelve calls per year.

Comment addressed.

22. *Response 3-3 discusses the trip generation associated with two baseball games, which is 48 vehicles at the Route 312 and Pugsley Road intersection. It should be noted that the trip generation for the site is 278 vehicles in the Weekday PM peak hour and 747 vehicles in the Saturday peak hour that will be turning into and out of the Route 312 and Pugsley Road intersection. The number of turning vehicles, regardless of signalization, may necessitate traffic safety officers at the intersection during peak days. Response 3-3 should be revised to discuss any observations of traffic control by police at the surveyed sites such as Connecticut Sportsplex.*

3/7/23: Comment not addressed. Response 3-3 should be revised to discuss Saturday peak hour operations with 747 vehicles turning into and out of the Route 312 and Pugsley Road intersection and the possible need for the use of traffic safety officers.

3/22/23: Comment addressed.

23. *In addressing the need for security personnel, Response 3-4 states that “primary staff will be responsible for monitoring patron activities on the site during operating hours.” The Applicant should clarify the number of staff members who are “primary staff” who will be responsible for monitoring patron activities, during peak and off-peak times, and approximately where these staff members will be located? Will there be any areas of the facility where primary staff will be limited or unavailable?*

Comment addressed.

24. *Response 3-4 relies on data from the Mount Kisco location to project the needs of the proposed Brewster Yards location. Information comparing the two locations should be included to show that the Mount Kisco location is an appropriate comparison. Alternatively, the Response should include additional reasons or information as to why the Applicant believes that private security is not required. The Applicant should consider adopting objective criteria or triggers for determining whether additional security is required, for example, if there is a reported incident.*

Comment addressed.

25. *The Brewster Fire Department provided calculations based on nationally averaged EMS call data, which yielded an estimate of twelve calls per season. Response 3-12 should acknowledge that EMS calls from the proposed facility may be within the range of the national average, i.e., 12 calls per season. Alternatively, the Applicant should provide reasons why the national average is an unsuitable predictor of EMS calls, other than the Applicant’s experience with the Mount Kisco facility.*

Comment addressed.

26. *Response 3-13, which states that space inside the main recreation building can be dedicated as a temporary medical station if needed, does not address the recommendation for an established First Aid / Medical Office. If a permanent First Aid / Medical Office is not feasible, then the Response should include a protocol that specifies the space that would be dedicated and that describes what and how measures would be taken to establish the temporary medical station.*

Comment addressed. The Maintenance Building is currently proposed to include the trainer’s room, which will be a permanent location for first aid/medical equipment storage and can also serve as a temporary medical station when needed.

27. *Response 3-13 states that the facility will hire staff with “trained ‘eyes and ears’” to monitor patron activity. The Applicant should specify the training that staff will have to help monitor patron activity.*
Comment addressed. The text was revised to remove this reference to training.
28. *Response 3-15 does not address the recommendation to have an AED attached to a mobile response vehicle.*
Comment addressed.
29. *Response 3-15 states that there will be “at least one First Aid vehicle on-site dedicated and equipped to provide initial emergency care and mobile transport.” The Response should clarify whether this First Aid vehicle is in addition to the EMS vehicle to be present during peak season tournament weekends, or if it is meant to be the same vehicle. If it is meant to be the same vehicle, then the Response should explain what mobile response unit will be available during weekdays and non-peak weekends.*
Comment addressed. The text was revised to indicate the first aid vehicle is in addition to the contracted EMS vehicle.
30. *With regard to the temporary medical station, Response 3-15 should cross-reference Response 3-13.*
Comment addressed.

CHAPTER 4: ECONOMIC CONDITIONS COMMENTS AND RESPONSES

31. *Response 4-6 should be clarified to indicate that construction jobs presented in the DEIS were in person-years (according to the DEIS), with a person-year being the equivalent of one person working full time for one year. In contrast, FTE refers to person-years divided by the length of the construction period in years.*
Comment addressed.
32. *Response 4-7 should be more specific in identifying the specific IMPLAN sectors that were used by code and description (e.g., Sector 55 – Construction of new commercial structures, including farm structures).*
33. *The text was revised to indicate IMPLAN Sector 57, Construction of new commercial structures (including farm structures) was used. This is the appropriate sector. Please indicate that this is Sector 57 using the IMPLAN 536 sectoring scheme, as this is not the most current scheme.*
3/22/23: Comment addressed.
34. *Regarding Response 4-8, the construction period benefits may be underestimated if soft costs were not entered into the IMPLAN model; nevertheless, this approach is conservative for the purposes of environmental/economic benefit analysis.*
Comment addressed.
35. *Responses 4-9 should be clarified to more clearly indicate the dollar year of any inputs or results and indicate if any results were adjusted for inflation. The current response states that “The 2021 year was utilized as the dollar year and results for the construction period of the project were adjusted for inflation.” It is unclear whether the inputs were in 2021 dollars and whether the results were adjusted to 2022 dollars. More information should be provided on how results were adjusted for inflation.*
Comment addressed.

CHAPTER 5: VISUAL RESOURCES COMMENTS AND RESPONSES

36. *Response 5-3 should confirm that DEIS Figures 5-2 to 5-6 will be updated with a note to the effect that the light poles are depicted at the maximum height of any actual light pole.*
Comment addressed.

37. Response 5-4 should specify the areas, other than the fields, that will have lighting; it should also specify the type/source of the lighting in such other areas, i.e., whether the lighting will be on 60 to 80-foot poles, as with the fields, or if the light posts will be lower to the ground.

Comment addressed. Lighting will be provided in areas of vehicular circulation, parking, sidewalks, and pedestrian plazas; lighting in these areas will be at a height of 18 feet and will be LED.

38. Responses 5-4 should consider referencing Response 17-1.

Comment addressed.

39. During the site plan review stage, the site lighting levels diagram should be revised to include a 0.5-foot candle contour.

3/22/23: The Applicant indicated an updated Overall Site Lighting plan will be provided during site plan review.

CHAPTER 6: CULTURAL RESOURCES COMMENTS AND RESPONSES

No comments on this chapter.

CHAPTER 7: NATURAL RESOURCES COMMENTS AND RESPONSES

40. An official species list should be obtained from the USFWS IPaC website and included with the FEIS and Response 7-1 should be updated accordingly. Please note that USFWS anticipates the IPaC system will be unavailable starting around 12/30/22 for up to a few months as they update their system for the change in northern long-eared bat listing status.

Comment addressed. A species list was added to Appendix B.

41. Response 7-8 should identify additional protective measures for the three turtle species of special concern (e.g., exclusion fencing, a pre-construction survey for these species, construction monitoring for these species, and further coordination with NYNHP/NYSDEC).

Comment addressed.

CHAPTER 8: GEOLOGY COMMENTS AND RESPONSES

No comments on this chapter.

CHAPTER 9: WATER RESOURCES AND WETLANDS COMMENTS AND RESPONSES

42. In Response 9-7, some of the measures listed as mitigation measures would be better categorized as minimization or avoidance measures (e.g., construction fencing to protect buffer areas).

Additional mitigation measures should be considered, such as the use of permeable pavement for the parking lots and site access roads. A wetland mitigation plan should be provided that would incorporate wetland plantings to be placed within the wetland buffers where there will be an anticipated disturbance. The plan should depict the proper seed mixes for the slopes based on the recommendations from the regulatory agencies. Include a soil remediation plan to ensure that proper wetland soils are used as topsoil, to ensure the viability of future plantings. The plan should convey the topsoil depths for plantings and seeding and the means and methods of installation. Due to the extensive slopes within the wetland buffer, ensure that clean fill is specified with the restriction against using recycled concrete aggregate (RCA) within the wetland buffer. The plan should also include the removal of invasive species throughout the limits of disturbance. Slope stabilization measures must be put into place and the clean fill placed in incremental lifts to ensure an engineered slope.

3/7/23: Comment addressed for the purposes of FEIS completeness review. Wetland mitigation plans have been submitted. Wetland plants have been included and species have been indicated. The plans show the proper recommended seed mixes for the different areas of restoration. The following comments should be addressed as the project moves through the site plan approval process:

- *Soil remediation cross-sections should be provided.*
- *Topsoil mix to be used for the wetland plantings should be specified.*
- *Gravel is mentioned as the sub-base material but the cross section for pavement calls out for the use of NYSDOT specification 304.02 which allows for the use of Recycled Portland cement concrete aggregate as the subbase. The use of recycled concrete aggregate (RCA) should not be placed within the area of the wetland buffers, or areas where excessive water will be inherent since RCA will leach lime and change the pH of the soil, which is detrimental to the existing trees and shrubs and the wetland.*
- *Slope stabilization should include hydro-mulch with the proper seed mix on the steep slopes adjacent to the impacted wetland buffer areas.*
- *Additional wetland mitigation plantings should be installed at the bottom of filled slopes where adjacent to or within a wetland buffer (e.g., Sheets SP-5.1 and 5.2)*
- *Runoff to the existing wetland pond adjacent to Zimmer Road could be reduced post-construction. Efforts should be made to discharge post treatment runoff to this wetland to maintain the wetland hydrology.*
- *Limit placement of silt fence within the wetland buffer when not otherwise required.*

3/22/23: Comment addressed for the purposes of FEIS completeness review. The Applicant indicated the wetland mitigation plans are under review by NYSDEC and an updated plan will be provided in a subsequent submission.

43. *Responses 9-8 should cross-reference Response 10-1 and should also be supplemented with a discussion of phosphorus treatment from the SWPPP.*

Comment addressed.

CHAPTER 10: STORMWATER MANAGEMENT COMMENTS AND RESPONSES

44. *Although Response 10-8 clarifies the currently proposed acreages of synthetic turf on each lot (14.6 acres on Lot 2 and 2.6 acres on Lot 3, Drawing OP-1 still states in footnote 3: “The open space calculation for proposed Lot 2 include 13.5 acres of synthetic turf. The open space calculation for proposed Lot 3 include 0.3 acres of synthetic turf.” This footnote, and the associated open space calculations, should be corrected as necessary. The addition of the percent of open space and the percent of lot coverage presented in the zoning table should not exceed 100, as is currently the case.*

Comment addressed. Both Response 10-8 and Drawing OP-1 have been updated and are now consistent.

45. *Response 10-10 should be augmented with additional detail regarding changes in discharge locations between the DEIS and FEIS. For example, stormwater detention basin EDB 1.4 from the DEIS is identified as EDB 2.4 in the FEIS and now discharges to a proposed catch basin at the northwest corner of the site near Fields Corner Road instead of to the undeveloped location shown in the DEIS. Stormwater detention basin EDB 2.7 from the DEIS is identified as EDB 3.7 and now drains toward the watercourse to the west of the basin instead of toward NYSDEC wetland LC-28 to the east.*

Comment addressed.

46. *Response 10-11 should provide more information regarding where and how the synthetic turf underdrain system will drain.*

Comment addressed.

47. *Response 10-12 should be updated to state the limit of disturbance within the property line (48± acres) and within the Town right-of-way (2± acres), for consistency with Drawing OPG-1.*

Comment addressed. Response 10-12 and Drawing OPG-1 are consistent and now state 51± acres of disturbance within the property line and 2± acres of disturbance within the Town right-of-way.

48. *Regarding Comment and Response 10-13, the Applicant should complete a slope stability analysis and design slope stability improvements as necessary for berms between detention and infiltration basins as part of site plan approval process.*

While the Applicant states pretreatment for proposed infiltration basins will be provided by extended detention at upstream dry basins, the NYSSMDM states that pretreatment “can be provided in the form of a sedimentation basin, sump pit, grass channel, plunge pool or other measure.” The Applicant should include one of these pretreatment measures into the design or demonstrate NYSDEC has an established precedent of accepting extended detention as a means of pretreatment.

3/7/23: Comment partially addressed. The Applicant should include one of these pretreatment measures (sediment basin, sump pit, grass channel, plunge pool) into the design or demonstrate NYSDEC has an established precedent of accepting extended detention as a means of pretreatment.

3/22/23: Comment addressed for the purposes of FEIS completeness review. Demonstration of appropriate treatment will be verified by the Town Engineer during site plan review.

49. *If any additional mitigation measures are included based on the comments above for Chapter 9, such as use of permeable pavement, they should be noted in Response 10-16.*

The Applicant noted that porous pavement was evaluated but is not being proposed due to inadequate soil depth to rock or to the seasonal high water table to meet the required separation distance to function properly. This was found to be an acceptable response to the comment submitted by the Town’s Wetland Inspector in comment #9.

50. *For Comments 10-17 through 10-21, the comment attribution should be “NYCDEP” rather than “NYSDEP.”*

Comment addressed.

51. *As noted above for Chapter 9, additional mitigation measures should be considered, such as use of permeable pavement for the parking lots and site access roads.*

See response to Comment 49 above.

52. *We recommend revisiting Response 10-20. It seems that there are areas that could be redesigned to accommodate limiting the disturbance to the wetland buffer. For example, on Sheet SP-2, consider shifting the concession stand to accommodate better circulation, reduce impervious pavement and reduce the impacts to the wetland buffer. On Sheet SP-3, consider placing the batting cages closer to the active ball fields and minimize the proposed steep slopes. On Sheet SP-4, consider shifting the storm water basins closer to the ball field and reconfigure the grading to follow the existing contours and limit the amount of fill within the wetland buffer. Also, on Sheet SP-4, the final outfall has a structure that is very close to wetland. This outfall pipe should be designed to be closer to the storm water basin and the structure shifted to run along the slope so that it will limit the overall disturbance and wetland buffer impacts.*

No further comment. The Applicant maintains that project elements were reviewed by the project team to confirm disturbance areas have been minimized while allowing the proper function of the designed systems. No updates were made.

CHAPTER 11: TRAFFIC AND TRANSPORTATION COMMENTS AND RESPONSES

53. *Response 11-4 notes that the traffic analysis was revised to address comments. The revised analysis indicates that, similarly to the Traffic Impact Study dated November 2021 and the accepted DEIS Traffic and Transportation chapter, unmitigated project-related traffic impacts would be experienced at the following locations:*

- a. *US Route 6 & NY Route 312 northbound through movement – Weekday AM peak hour, Weekday PM peak hour, Saturday peak hour*
- b. *US Route 6 & NY Route 312 westbound left turn/through lane movement – Weekday PM peak hour, Saturday peak hour*

These impacts should be identified unmitigated impacts. Any modifications to the proposed traffic mitigation measures as a result of the revised analysis should be clearly identified.

3/7/23: Comment partially addressed. The following intersections experience additional impacts due to the proposed mitigation measures, and these impacts should be identified as unmitigated: NYS Route 312 & US Route 6, NYS Route 312 & I-84 Eastbound Ramps, NYS Route 312 & I-84 Westbound Ramps. Otherwise, revisions to the mitigation measures and analysis should be provided such that the proposed mitigation measures do not result in additional impacts.

3/22/23: Comment addressed. These impacts are identified as unmitigated.

54. *Response 11-10 contains a typo and should reference “(DEIS Appendix J).”*

Comment addressed.

55. *Response 11-13 states that the closure of Fields Corner Road to public traffic is the preferred alternative. Figure 1-2 should be revised to depict any signage used to close Fields Corner Road, and Response 11-13 should be revised to reference Figure 1-2.*

Comment addressed.

56. *Response 11-26 should refer to both Response 11-25 and Response 11-13.*

Comment addressed.

57. *Response 11-28 should discuss the projected traffic operations at Route 312 and I-84 Eastbound Ramps/Independent Way intersection which provides access to the Southeast Metro-North station.*

Comment addressed.

CHAPTER 12: INFRASTRUCTURE AND ENERGY COMMENTS AND RESPONSES

58. *Response 12-6 should cross-reference a drawing that shows the location of the fire department connection on the building.*

Comment addressed. The Applicant revised Response 12-6 to indicate these plans are being advanced and will show the location of the fire department connection. This should be provided during site plan review.

59. *Response 12-7 should note what chemicals might be stored on-site.*

Comment addressed. The response was revised to indicate that liquid chlorine for use in the water treatment system is the only chemical anticipated to be stored on-site.

60. *Response 12-13, in listing the green building standards the project will consider, states “Minimum indoor air quality (IAQ) performance – will use energy efficient HVAC systems.” Use of energy efficient HVAC systems should be moved to the subsequent bullet regarding minimum energy performance. Measures considered regarding indoor air quality should be listed.*

Comment addressed.

61. *Response 12-15 contains a typo: the mention of “39,192” should be “30,192.”*

Comment addressed.

62. *Response 12-16 should include the date of the conversation with the Terravest Corporate Park Principal.*

Comment addressed.

CHAPTER 13: AIR QUALITY COMMENTS AND RESPONSES

63. *Response 13-3 should include the discussion of the attainment status for each criteria pollutant for Putnam County based on the designations listed in the EPA Green Book.*

Comment addressed.

64. *Response 13-4 states: "All monitored pollutants for Region 3 and averaging periods are provided in DEIS Table 13-4." However, Table 13-4 seems to only include pollutants monitored at the Mt. Ninham station. For the Mt. Ninham stations, in addition to ozone and annual average SO₂, please include the 3-year average 99th percentile value for 1-hour SO₂ and confirm the footnotes for SO₂ in the table. The value from the NYS Ambient Air Quality Report for ozone does take into account multiple years (average), but the same comment applies to 1-hour average SO₂ to be consistent with the form of the NAAQS.*

Comment addressed. AKRF notes the 2021 NYS Ambient Air Quality Report is now available. The 2021 SO₂ annual arithmetic mean is 0.19 ppb, the most recent 3-year average 99th percentile value for 1-hour SO₂ is now 1.37 ppb, and 4th highest daily maximum 8-hour average ozone is now 0.061 ppm. These values are still within the standards.

65. *Response 13-8 states: "As indicated in Response 13-7, the project does not meet the criteria for an air quality analysis and therefore would not meet the requirements for a PM Hot-Spot analysis per the EPA Transportation Guidance document." Additional consideration for the level of increase in diesel vehicles due to the project is usually needed for PM depending on expected future traffic operations. The response does still clarify that this is not expected to be needed for the project.*

Comment addressed.

CHAPTER 14: NOISE COMMENTS AND RESPONSES

66. *Response 14-8 does not provide sufficient information to support the DEIS statement that "Noise Levels of 70 to 80 dBA will occur at the residential property line when tree clearing and grading is done in this area." Since this period of construction is previously stated to be the most noise-intensive, it is important to support the estimated maximum noise level. Since, as stated in Response 14-10, this most noise-intensive work is expected to occur over a limited period (i.e., approximately 2 months), that is a reasonable basis by which to determine that its effects would not be significant; however, the maximum noise level should be supported.*

3/7/23: Comment not addressed. The types of construction equipment anticipated to be used within the vicinity of the multisport field and adjacent stormwater basins should be identified in Response 14-8. Use of a rock drill or blasting in this area could potentially result in noise levels above 80 dBA at the residential property boundary.

3/22/23: Comment addressed. Response 14-8 now indicates that noise levels at the residential property line from construction activities in the vicinity of the multisport field are expected to reach up to 80 dBA for approximately one month for rock removal and up to 78 dBA for approximately five months for grading. Response 14-8 also now indicates noise levels during construction of the turnaround on Fields Corner Road adjacent to the closest neighboring house are expected to reach up to 91 dBA for approximately one month.

67. *Response 14-13 did not provide all of the requested information. It is beyond the scope of this review to request the detailed information from the referenced municipalities. If measured noise data from those projects is being used to support the conclusions of this analysis, the data must be provided for review.*

No further comment.

68. Response 14-14 acknowledges that the DEIS underestimated the noise from batting. Based on the updated reference, a discussion of batting noise should be provided. It would appear that while the sound of batting may be audible at some locations, these sound events are of very short duration, would not occur during overnight hours, and would not affect the L_{eq} or average sound level. Consequently, batting noise would not be expected to result in objectionable levels of noise, nor would it contribute to cumulative noise levels associated with the Project.

Comment addressed.

69. To support the results in Response 14-15, please provide a markup showing distance measurements and calculations showing the attenuation assumed with those distance values. Please also provide support for the assumption of 65 dBA for the Showcase Fields. The estimated cumulative noise level should be compared to measured ambient noise levels during each time period, especially the evening time period unless there is some restriction preventing multiple fields from being in use during that time.

3/7/23: *Comment addressed. Response 14-15 should cross-reference Response 14-14.*

3/22/23: The additional cross-reference was added.

CHAPTER 15: CONSTRUCTION IMPACTS COMMENTS AND RESPONSES

No comments on this chapter.

CHAPTER 16: ALTERNATIVES COMMENTS AND RESPONSES

70. Response 16-2, in addressing the alternative where one or more ballfields are natural turfgrass and the remainder are synthetic turf, refers to DEIS 16.4, which analyzes the alternative where all nine ballfields would be natural turfgrass (DEIS 16.4 “Natural Turf Alternative”). However, Response 16-2 does not differentiate between the two alternatives, particularly, an alternative where only one ballfield is natural turf (e.g., the “Showcase Baseball Field”) and the remaining eight are synthetic, versus, the alternative where all nine ballfields are synthetic. Response 16-2 should specifically evaluate the alternative with one, or one to two, ballfield(s) of natural turfgrass. The evaluation should address potential impacts to the project, including economic impacts, infiltration rates and the stormwater model, sufficient to meaningfully compare that alternative with the “all natural turfgrass” alternative and the proposed project of all synthetic turfgrass.

Comment addressed. It is the Applicant’s position that although one or more natural turf fields would provide some benefit in terms of reducing stormwater runoff, this alternative would curtail the use of the facility during rainy days and days following rain events to the extent which economic viability of the project would be impacted and the Applicant’s objectives of the proposal would not be supported.

71. Response 16-3 does not provide information sufficient for a meaningful comparison of potential environmental impacts between alternatives.

Comment addressed.

CHAPTER 17: CUMULATIVE EFFECTS COMMENTS AND RESPONSES

72. Response 17-1 should provide the source or standard used to determine the distance limits for a “sensitive noise receptor.”

Comment addressed.

73. Response 17-1 should provide Brewster Yard’s projected operational noise levels, as well as the cumulative noise level when combined with Lincoln Logistics’ projected 55 decibels. Response 17-1 might also include decibel levels for reference, e.g., that 20 dB is a leaves rustling, and 75 dB is a vacuum cleaner.

Comment addressed. The response now indicates the Brewster Yards peak operational noise levels of 75 dBA would be reduced to less than 42 dBA at Hunters Glen. The response was also updated to discuss the cumulative noise level of Brewster Yards and Lincoln Logistics of 55.2 dBA and that due to intervening topography, noise from Lincoln Logistics would be dominant for Hunters Glen residents.

74. *Response 17-1 should consider referencing Response 5-4.*

Comment addressed.

75. *In Response 17-2, the reference to “DEIS section 5.3 assessment” could be more specific, e.g., “DEIS Section 5.3 “Potential Visual Impacts,” “Cumulative Effects”.*

Comment addressed.

APPENDIX A SEQR DOCUMENTATION

No comments on this appendix.

APPENDIX B CORRESPONDENCE

No comments on this appendix.

APPENDIX C DEIS PUBLIC HEARING TRANSCRIPT

No comments on this appendix.

APPENDIX D WRITTEN COMMENTS RECEIVED ON THE DEIS

76. *On Letter 6, “Brewster Fire Department Target Hazard Planning Group,” at the top of page 3, the reference to Comment 3-12 should be changed to “3-14.” Directly beneath, the reference to Comment 3-1 should be changed to “3-15.”*

3/7/23: Comment not yet addressed. Page 3 of Letter 6 is now blank in the PDF.

3/22/23: Comment addressed.

APPENDIX E PRELIMINARY STORMWATER POLLUTION PREVENTION PLAN

No comments on this appendix.

APPENDIX F TRAFFIC IMPACT STUDY AMENDMENT

No comments on this appendix, save for the aforementioned.

APPENDIX G CIVIL DRAWINGS

77. *Drawing LP-1.1 (Lighting Plan for Parking and Pathways) states “Please reference Musco’s athletic field lighting for light levels within athletic fields and surrounding areas.” A comprehensive lighting plan will need to be provided during site plan review so that light levels from all lighting sources can be evaluated along the property line for compliance with the zoning code.*

Comment addressed. Appendix I, “Site Lighting Levels,” provides an illumination summary as well as a “property line spill” for the project site from Musco Lighting.