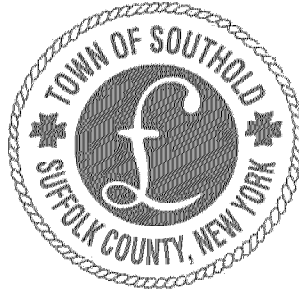


OFFICE LOCATION:
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54375 State Route 25
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PLANNING BOARD OFFICE
TOWN OF SOUTHOLD

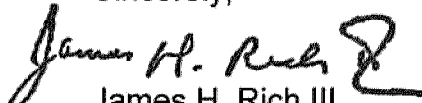
April 6, 2021

Charles R. Cuddy, Esq.
P.O. Box 1547
Riverhead, NY 11901

Dear Mr. Cuddy,

The Planning Board has reviewed your letter of February 26, 2021 and the request to reconsider items in the Final Scope for the project referenced above. While the Board, as Lead Agency, feels that there was nothing irrelevant in the scope as adopted, we have reviewed the list of objections provided by PWGC and provide a response to each in the attached document.

Sincerely,


James H. Rich III
Vice-Chairman

Strong's Storage Buildings

Planning Board Clarifications and Comments in Response to Final Scope Amendment Request from the Applicant

April 5, 2021

Item from PWGC

1. Impact on Water Resources

- **The Final Scope is requiring that the DEIS include the "impacts to groundwater quantity available to neighboring wells...based on field studies over four seasons."**

The proposed project includes a connection to the public water supply and discontinuing the use of existing on-site private wells for the entire facility, thus reducing the amount of water currently being withdrawn on the site to only that which may be required for landscaping. The applicant has also consulted and obtained a letter of water availability from the Suffolk County Water Authority (SCWA), which will be included in the DEIS. Conducting a four-season groundwater quantity study would be **appropriate for projects that are considering new supply wells, or** significant increases in supply wells, that would increase the volume of water being withdrawn from the aquifer. As this project seeks to reduce the volume of water withdrawn on the site for a connection to the SCWA, there is no rational basis for a year-long study of groundwater quantity. We recommend removal of such study from the DEIS.

Planning Board Response

Conducting this study is necessary to analyze the impacts to groundwater quantity available to the neighboring wells. This is rational because the DEIS must address potential moderate to large impacts from significant soil excavation on-site that is potentially capable of affecting the hydrology and zones of influence for nearby private wells, and the quantity of water available after excavation is completed. Because the aquifer can fluctuate seasonally, conducting this study over time is important to account for all seasons including summer when quantities may be significantly lower due to less rainfall.

Item from PWGC

- **The Final Scope is requiring that the DEIS "analyze and discuss in detail the impacts on private wells in the surrounding area including technical details on groundwater depth, quality, quantity, freshwater lens, saltwater interface, amount of flow in GPM, direction of travel, and travel times. Include zones of influence from each wellhead."**

This required study is requesting the applicant to monitor the individual wellheads from all private wells for a project that does not require the installation of new wells, but rather the discontinuing of the use of existing supply wells. Further, the application includes conversion of the existing on-site individual sanitary system to an I/A OWTS. This conversion would reduce nitrogen load and improve groundwater quality. Additionally, the

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

proposed project will recharge all stormwater on site, which will continue to recharge the aquifer. Finally, the proposed action does not involve any dewatering or excavation in groundwater. Accordingly, since the project is discontinuing the use of on-site wells, is improving the conditions on site and does not involve dewatering, there is no rational basis for such a study. We recommend removal of this analysis from the DEIS.

Planning Board Response

- The monitoring of specific wellheads is not intended to be included within the final scope or DEIS.
- This is rational because the DEIS must address potential moderate to large impacts from significant soil excavation on-site that is potentially capable of affecting the hydrology and zones of influence for nearby private wells, and the quantity of water available after excavation is completed. Because the aquifer can fluctuate seasonally, conducting this study over time is important to account for all seasons including summer when quantities may be significantly lower due to less rainfall.
- Below are clarifications of what must be included:
 - a. Will the proposed action adversely impact any wellhead zone of influence, or the quantity or quality of water in the aquifer that supplies nearby residential wells?
 - b. An analysis of the groundwater on site and its contributions to the aquifer serving nearby wells under existing conditions, and the potential adverse effects, if any, to the aquifer serving nearby wells following excavation.
 - c. Conduct the analysis over the course of a year to account for seasonal fluctuation.
 - d. Study and describe the nature of the aquifer that supplies the nearby wells, and the relationship of the subject property as a contributing source to that aquifer; or show that this subject property is not a contributing source and that the proposed excavation will not affect the quantity of water available to nearby wells.
 - e. Direction of groundwater travel and travel times: What direction is groundwater traveling on site? Would the excavation disrupt or interrupt groundwater travel or timeframes to reach surface waters?
 - f. Depth of freshwater lens and elevation of the saltwater interface: Will the proposed excavation alter the saltwater interface in a way that may cause saltwater intrusion into the aquifer or nearby wellhead zones of influence? Will the proposed excavation cause upconing and saltwater intrusion by reducing the amount of fresh water entering the aquifer used by the nearby wells. At what elevations does potable freshwater begin and end (at the expected saltwater interface) on site pre and post excavation?

Item from PWGC

- The Final Scope is requiring the DEIS to "discuss the narrowness of the creek in this area and tidal flow restrictions in an acceptable model. Include the increase tidal flow volume and velocity restrictions that could result from the increase in boats or

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

docks (if any)." On page 23 of the Final Scope, the "extent and quality of the information existing and needed" indicates "Water/Tidal flow modeling/study in front of the Marina including docks and boats (applicant generated)."

The proposed application is for the construction of two storage buildings for indoor, heated storage, within a facility that has existed for nearly 60 years for the purpose of boat storage, dockage, and maintenance. As repeatedly indicated by the applicant and the project team, the proposed application does not include any docks. Furthermore, the proposed application does not include any Inlet modification that would alter tidal flow, and does not introduce a vessel length that is currently not using the Inlet today. It is unclear why the use of Mattituck Inlet for boat travel to SYC for the purpose of winter storage requires a water/tidal flow modeling/study. The DEIS will present NOAA data as published at <https://tidesandcurrents.noaa.gov>, as well as an independent Mattituck Inlet Survey with soundings at low tide already conducted by H&L Contracting LLC in April 2020. Please confirm that this is acceptable.

Planning Board Response

- The narrowness of the creek in the area and the effect of the proposed action on tidal flow is being required to be discussed in the DEIS.
 - Although the applicant states that "the proposed action does not include any docks; the DEIS must discuss the proposed action in relation to potential growth and construction of future new docks and marina expansion.
 - If it is the intent of the applicant to not request the construction of new docks or a marina expansion now, or in the future, that should be made clear in the DEIS.
 - The NOAA data and Mattituck Inlet Survey suggested may be acceptable to include in the DEIS in place of a new water/tidal flow model/study if they provide sufficient information to determine whether there will be an impact to water quality resulting from potential lower velocity of tidal flow from additional large boats.
 - Discuss the effect of mooring large boats at the marina on tidal flow as compared to current conditions, and if there are adverse impacts, what mitigation could be achieved.
-
- **Item from PWGC**

2. Impacts on Transportation

- **The Final Scope is requiring "real-time" traffic data and roadway user group and analysis over four seasons.**

It is unclear what the term "real-time traffic data" is intended to mean. In Traffic Engineering terms, "real time" data usually refers to traffic data that is continuously recorded and available whenever called for. Real-time data is used in Traffic Management Systems such as NYSDOT's INFORM system in Hauppauge as input to the traffic control system managing traffic signals, ramp meters, and variable message signs. Please define "real-time data" for the purpose of this study.

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

Planning Board Response

- In the context of the Lead Agency's Final Scope, real-time traffic data refers to traffic counts in the field over a certain timeframe.
 - For clarification, "roadway user group" means the user groups using the roadways and their respective activities in type, frequency and location, including vehicles, pedestrians, runners, and cyclists.
-

Item from PWGC

Conduct of the traffic analysis over four seasons is inappropriate. The Institute of Transportation Engineers (ITE) recommends that traffic analyses be conducted based on average yearly traffic data (the average day throughout the year). The ITE, NYSDOT and the Suffolk County Department of Public Works all use "Seasonal Adjustment Factors" to adjust traffic data taken any time during the year to the Average day's traffic. The same seasonal adjustment factors can be used to take data taken any time during the year to traffic experienced during any particular month. The "average day is typically done throughout Long Island with the exception of the five eastern Towns, where peak summer data is typically used. Weekday AM and PM Peak Hours and the Saturday Peak Hours are studied to determine the proposed project's impact on roadway's experiencing peak traffic conditions. According to data from the NYSDOT Permanent Count Station on Route 25 in the Town of Southold peak traffic occurs during August.

It must be noted that the traffic analysis is intended to examine the traffic impacts related to the construction of the project and in particular the removal of soil, construction of drainage facilities and the retaining walls. This work is going to be done between September 15th and May 15th so as to not interfere summer activities in the area. Boats stored in the completed project building are too large to trailer and will arrive after Labor Day and be put back into the water in the Spring. The project will have no traffic impact in the Summer, and we see no valid reason to collect data during the Summer.

Based on the above, it is recommended the traffic data be collected in April of 2021 and be adjusted as necessary using seasonal adjustment factors.

Planning Board Response

- "Traffic analysis is intended to examine impacts related to the construction of the project..." As you are aware, the intent of SEQR is to analyze the whole action. The Planning Board finds it necessary to assess potential adverse impacts from traffic for all phases of construction and operation of the Marina property. To omit the summer months in an assessment would not meet the intent of SEQR regulations.
- The proposal to collect traffic data only in April of 2021 and adjust the numbers using the seasonal adjustment factors is a deficient assessment. The Lead Agency requires

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

four seasons of traffic counts to ensure the analysis accurately reflects the traffic situation in Southold Town.

- While August may appear to be the peak of traffic based on Rt. 25 counts, what happens on the other roads is not captured by those counts and cannot be relied upon to accurately reflect peak traffic times.
 - Traffic influences in the Town of Southold are no longer limited to “seasons”. It is expected that day forward traffic data will reflect post pandemic increases in traffic due to population increase and higher tourism influx. The NYSDOT Permanent Count Station located on NYS Route 25 does not reflect traffic conditions on Suffolk County Route 48 and therefore it is not accurate to extrapolate traffic conditions from there to other roadways.
 - As such, seasonal adjustment factors based on that one roadway’s data are too generalized to gauge the actual traffic impacts, and traffic counts must be done at key intersections at several times of the year.
-

Item from PWGC

The Final Scope also does not specify the type of analysis to be conducted with respect to roadways such as West Mill Road and Cox Neck Road.

The Final Scope does not define which roads are to be studied; but lists many roads; some of which may never see project traffic. It is typical to set a threshold as an indication of whether the project's traffic may have a potential impact. Typically, the ITE recommends a 5% threshold, indicating that if the project's traffic exceeds 5% of the existing traffic volume, that the project's impact on roadway or intersection should be examined

Planning Board Response

- In addition to Level of Service counts, the Lead Agency is requiring an analysis to assess the impacts of the proposed action to the safety of all user groups along the route for vehicles to and from the subject site. This includes a Traffic Safety Evaluation and a Pedestrian and Cyclist Safety Evaluation.
- Elements of these evaluations include but are not limited to the following:
 - Sight distances at intersections and around curves in the roadways
 - Width of pavement
 - Locations and width of shoulders along the route.
 - Assessment of the amount of space a pedestrian or cyclist would have on the pavement when two vehicles pass each other.
 - Assessment of any other existing traffic, pedestrian or cyclist safety infrastructure (e.g. signage or pavement markings).
 - Assessment of the safety of a pedestrian when two vehicles pass each other while a cyclist or pedestrian is traveling on the shoulder.

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

- Assessment of the perceived safety by pedestrians and cyclists given the pavement width and speed limits along the route and expected traffic generated by this project.
 - Assessment of large trucks' turning radii and their ability to complete safe turning movements at all intersections and safely navigate all corners in the streets along the route, e.g. truck template for route traveled by the largest vehicles expected to make regular trips in and out of the site.
 - Accident data from the New York State Accident Location Information System for the last three years for intersections and their immediate vicinity.
 - Driveway locations and operation including the potential for stacking on the public street during busy times.
 - West Mill Road and Cox Neck Road in particular must have these evaluations.
-

Item from PWGC

- **The Final Scope does not identify the study intersections requiring a Level-of-Service analysis.**

Final Scopes typically define the intersections to be studied. The intersection of Sound Avenue at North Road (CR 48) and Cox Neck Road could be appropriate although it is very unlikely to show any impact, as the additional traffic added by the project will would not typically influence the capacity of the intersection.

Planning Board Response

- Level of Service analyses should correlate to the routing plan for vehicles to and from the subject site. At a minimum the following intersections should be included:
 - Intersection of West Mill Road and Cox Neck Road
 - Intersection of Cox Neck Road and Sound Avenue/ County Route 48
-

Item from PWGC

- **The Final Scope is requiring the DEIS to "provide a comprehensive boat (vessel) traffic study analysis...of the potential moderate to large significant increase of boats to the Mattituck Inlet. Include the existing conditions analysis and potential impacts on: Water Quality — include a discussion on the current and potential adverse moderate to large impacts to surface water quality in the short and long term (duration). Provide the NYSDEC shellfish closure areas, types of pollutants occurring in the creek currently, types of chemicals in marina and vessel maintenance needs in the proposed construction and operation of the marina facility and mitigation. Include, but not limited to, dissolved oxygen, clarity, eutrophication, and sustainability for estuarine and marine life, as well as existing sources of stormwater. The potential for sedimentation during construction, and resulting, post-construction, long-term stormwater runoff contributions from the site will be described and quantified."**

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

On page 23 of the Final Scope, the "extent and quality of the information existing and needed" indicates "Water quality assessment of current conditions in Mattituck Inlet overall all four seasons (applicant generated)."

First, an assessment of the potential impacts to water quality due to boats arriving to the site for storage and leaving the site to return to their base marinas or docks is more appropriately addressed in the Impacts to Water Resources (Groundwater and Surface Waters). We propose to move this assessment out of the transportation section, which best addresses the impacts on transportation infrastructure.

Planning Board Response

- The Planning Board agrees that the potential impacts to water quality could be addressed in the Water Resources section.
-

Item from PWGC

Second, we would like to request clarification of the assessment included. The Final Scope seems to suggest that the applicant is to collect surface water quality data to document the water quality of the Mattituck Inlet although published data through various programs is available, including data provided by the Suffolk County Department of Health - Bureau of Marine Resources for five water quality sampling locations in Mattituck Creek from 2000 to 2020. The DEIS proposes to rely upon the published data from Suffolk County, as sourced below, as well as scientific data and literature that exists for the Mattituck Inlet, including:

- Suffolk County Department of Health Services (SCDHS), 2021. Surface water quality monitoring data provided by the SCDHS Office of Ecology, Yaphank, N.Y
- Existing Cornell Program data at the SYC Facility (Cornell Cooperative Extension of Suffolk County — Long Island Shellfish Restoration Project)
- NYSDEC water quality data for shellfish protection — to be obtained through FOIA request to Town of Southold Trustees office for data.
- Suffolk County Subwatershed Wastewater Management Plan, July 2020.
- Long Island Sound Study and the 2015 revised *Comprehensive Conservation and Management Plan*.

As excerpted from the NYSDEC's SEQR Manual, Fourth Edition, 2020, "the use of existing comprehensive plans, prior EISs, and natural resource inventories expedites scoping and reduces the need to develop extensive new data for the current EIS." Accordingly, our proposed methodology is consistent with the NYSDEC guidance. Please verify if such baseline data is acceptable.

Planning Board Response

- Existing water quality baseline data are acceptable to be included within the DEIS so long as they are current (2020 data are acceptable).
-

Item from PWGC

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

To assess the potential water quality impacts from the additional boats traveling to and from SYC for winter storage purposes, the DEIS will rely upon the aforementioned published resources for baseline data and the potential impacts of the boats to be stored on site would be evaluated as follows:

- > Number of existing boats under the control of Strong's Marine that use the Inlet.
 - > Number of projected additional boats that would travel to/from SYC for the purpose of entering and exiting storage (i.e., 88).
 - > Quantify for the expected additional boats: boat type (length and make); types of engines; and environmental discharge data from the boat and/or engine manufacturers for in water movement and at idle.
 - Total number of boats that utilized Mattituck Creek/Inlet in the 2020 boating season.
 - Impact of the projected additional boats for storage facility.
- **The comprehensive boat (vessel) traffic study analysis is further requested to "discuss the impact of increased boat traffic due to the expanded activities including devising a methodology to police and monitor the water quality."**

This request seems to further the general misunderstanding that this project will lead to an increase in continuous boat traffic that will lead to an impact to the quality of the Inlet. The proposed action includes two buildings for the purpose of winter boat storage. The project does not include the use of these buildings year-round, does not propose year-round boat traffic in an out of the facility, does not propose any additional docks, or any other facilities to house boats that arrive to the site for storage. As expressed by the applicant throughout the process to date, the purpose of the project is to provide indoor, heated storage for boats. The boats will arrive to the facility at the close of boating season (i.e., October-November) and the same boats will be removed from storage and exit the Inlet in the beginning of the boating season (i.e., April-May). It is estimated that approximately 88 boats per season would be stored in the new buildings. Accordingly, given an eight-week timeframe for entry to storage in the Fall and the same timeframe to remove boats from storage in the Spring, this equates to an average of approximately 11 boats per week or less than two boats per day. Based on the actual proposed use, the request for the applicant to devise methodology to police and monitor water quality suggests a much more intense use.

Also, it is important to note that the Mattituck Inlet currently has three marinas/docking facilities (Strong's Yacht Center, Strong's Water Club & Marina and Mattituck Fishing Station), two public boat launches (Mattituck Creek Waterway Access Site and North Road Inlet), two fueling stations (at the two Strong's-owned marinas), one pump out boat owned by SYC (as the existing pump out station at the Mattituck Creek Waterway Access Site has been inoperable for two years), and is an authorized area for boats to anchor overnight. Recognizing that Mattituck Creek is a heavily-traveled waterway in the Town, there is no possible way to police and monitor water quality solely related to boats that dock or elect to be stored at SYC. We propose to address those items that are within the control of SYC.

Planning Board Response

- Thank you for the clarification on the boat storage operations. Please include this discussion within the DEIS. Although the increase in boat traffic in the inlet as a result of this action is a fact. The discussion on potential impact to water quality (turbidity

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

impacts and chemical introduction through bottom paints and other boat maintenance practices) to the water body must be discussed in the Water Resources Section.

- The Planning Board remains concerned about the effects of boats not only traveling to and from the storage facility, but also the effect of multiple large boats potentially stacking up in the inlet as they wait to be lifted and stored. Also what effect the new facility might have during the summer. Will there be additional boats traveling to the site for repairs during the summer?
 - The Planning Board amends the requirement regarding the need to develop a methodology to police and monitor water quality to only those actions within the control of the applicant.
-

Item from PWGC

3. Impacts on Air Quality

- **The Final Scope is requiring an air quality analysis for boat traffic.**

The request for an air quality analysis is not reasonable when considering the projected number of boats (88 vessels twice per year) and the purpose of the project (i.e., indoor, heated storage). Given an eight-week timeframe for entry to storage in the Fall and the same timeframe to remove boats from storage in the Spring, this equates to an average of approximately 11 boats per week or less than two boats per day. Averaged annually, the total 176 trips (88 boat trips in the Spring and 88 boat trips in the Fall) equates to 0.48 boat trips per day.

Planning Board Response

- Thank you for the information on the projected number of boats. Note that SEQR requires assessment not of just what is proposed, but also existing conditions. The Planning Board will remove the requirement for an air quality analysis for boat traffic but continues to require an assessment on the potential adverse impacts to air quality from construction activities and marina operations.
-

Item from PWGC

4. Construction-Related Impacts

- "Mining" is not proposed and the Final Scope should be amended to reflect the proposed project.

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

Repeated throughout the Final Scope is the term "mining," which is not proposed as part of this development **and the proposed action is not subject** to a NYSDEC Mined-Land Reclamation Permit. "Mining," as defined by the NYSDEC, is defined as *"the extraction of overburden and minerals from the earth; the preparation and processing of minerals, including any activities or processes used for the extraction or removal of minerals from their original location and the preparation such as washing, cleaning, crushing, stockpiling or other processing at the mine location that makes a mineral suitable for commercial, industrial, or construction use."* The use of the term "mining" is suggesting that this applicant is proposing to remove materials for some monetary benefit and should be revised to "excavation" or "cut".

Planning Board Response

- Please provide official documentation in the DEIS that no action on-site constitutes mining.
-

Item from PWGC

5. Consistency with Community Plans and Studies

- **The Final Scope requires the DEIS to include "an in-depth analysis of the action on the following policy and planning documents, legislation, and implementing rules and regulations...2019 Suffolk County Special Grand Jury Report: Illegal Dumping & Mining, Suffolk County."**

The inclusion of this document in this applicant's Final Scope suggests some illicit activity or involvement in "Operation Pay Dirt." As the proposed removal of material from the subject property is for the sole purpose of constructing a marine development at-grade with the Mattituck Creek, the inclusion of this source suggests otherwise and should be removed in its entirety from the Final Scope. The DEIS will not address this source and the applicant requests an amended Final Scope be issued.

Planning Board Response

- The reference to the "2019 Suffolk County Special Grand Jury Report: Illegal Dumping and Mining Suffolk County" was an oversight and will be removed from the final scope.
-

Item from PWGC

- **The Final Scope is requiring studies and analyses that seem to be in direct conflict with the Town's recently adopted (September 2020) Comprehensive Plan Update.**

The subject property has existed for marine use for over 60 years. In 2017, the Strong's Marine family acquired the former Mattituck Inlet Marina and Shipyard (now Strong's Yacht

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

Center and applicant) as well as Matt-a-Mar (now the Strong's Water Club & Marina), and only one other marina (Mattituck Fishing Station) remain on the Mattituck Inlet.

In the Southold 2020 Comprehensive Plan, adopted September 2020, one of the economic development goals stated is "Goal 5: Preserve, Encourage, and Continue to Support Existing and Future Maritime Uses as an Important Business Sector within the Town's Economy." The ability for large marinas to expand services that cater to customer needs was specifically recognized. As excerpted from the stated Objective 5.4 for Economic Development, "Large marinas are facing pressures to expand their services to include swimming pools, restaurants, boat rentals, **storage space**, and other services that cater to their customer's needs. In order to accommodate this demand and continue to promote Southold's traditional maritime heritage, the Town should consider zoning amendments for marinas of appropriate size and location to better match the needs of their clients."(emphasis added) While this objective seeks zoning amendments to allow for such uses, the subject application does not require any such relief under the Marine-II zoning.

Further, the importance of Mattituck Inlet was specifically addressed in Objective 5.7 to "Enhance the connection between Mattituck Inlet and the hamlet center." As excerpted, "Mattituck Inlet is an important economic, environmental, and recreational resource in the hamlet of Mattituck. Located just north of the hamlet center, Mattituck Inlet runs two miles into the North Fork from Long Island Sound, and is the only harbor on the ±50 mile stretch between Port Jefferson and Orient Point. As such, Mattituck serves as an important maritime location with the Inlet being a popular destination for boaters. The hamlet's accessibility to water, in addition to a designated anchorage, a Town park and boat ramp, marinas, and maritime uses located close to the hamlet center make it a key economic driver."

It is recognized that viewshed and maintaining the community character is of importance (Objective 5.5: Preserve the scenic views along the Town's shoreline through continued acquisition of waterfront property, balancing its uses to include preserved land and a range of outdoor activities and public recreation), and the Final Scope has identified the potential visual impacts as an impact issue to be evaluated. However, the request for year-long studies of traffic, roadway user groups, surface water quality and groundwater quality given the scope of the project for storage space only, seems to be in direct contradiction to the stated economic development goals in the Town's comprehensive plan

Planning Board Response

- The discussion about requiring studies that are in direct conflict with the Southold Town Comprehensive Plan (2020) is noted and should be included within the DEIS. However, none of the goals and objectives mentioned preempt the regulatory authority of SEQRA assessment of a Type I action.
-

Item from PWGC

6. DEIS Outline is Redundant or Too General

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

The Final Scope includes sections for Impacts on Ecological Resources, and Impacts on Plants and Animals. These sections are proposed to be combined as Ecological Resources includes plants and animals.

- The Final Scope includes a section for Impacts on the Environment, requesting the DEIS to "discuss the operations of the site and the overall impact on the environment." Pursuant to Section 617.2(1) of the implementing regulations of SEQRA, the definition of "environment" is as follows:

(1) Environment means the physical conditions that will be affected by a proposed action, including land, air, water, minerals, flora, fauna, noise, resources of agricultural, archeological, historic or aesthetic significance, existing patterns of population concentration, distribution or growth, existing community or neighborhood character, and human health.

Accordingly, the Impacts to the Environment is accomplished through the preparation of the DEIS and the various impact sections and is not appropriately handled in its own section as it would require summarizing the content of the DEIS. We propose to address the requested elements (Items 2, 3 and 4) in their respective sections — ecological resources and water resources.

- The Impacts on Transportation includes a comprehensive boat (vessel) traffic study that includes a water quality assessment that is more appropriate for inclusion in the Water Resources section. We propose to address the potential impacts on surface water quality in the Water Resources section.
- In the "Proposed Organization and Overall Content of the DEIS", it is noted that:
 - Section 4.1 duplicates Section 3.8
 - Section 4.2 duplicates Section 3.1
- Our proposed outline is as follows:

Planning Board Response

- The Planning Board agrees with the amended outline for the DEIS

Executive Summary

1.0 Description of the Proposed Action

- 1.1 Project Location and Site Conditions
- 1.2 Project Design and Layout
- 1.3 Project Objectives and Benefits
- 1.4 Construction and Operations
- 1.5 Required Permits and Approvals

2.0 Natural Environmental Resources

- 2.1 Impact on Soils and Topography

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

- 2.1.1 Existing Conditions
- 2.1.2 Potential Impacts
- 2.1.3 Proposed Mitigation
- 2.2 Impact on Water Resources (Groundwater and Surface Water)
 - 2.2.1 Existing Conditions
 - 2.2.2 Potential Impacts
 - 2.2.3 Proposed Mitigation
- 2.3 Impact on Ecological Resources
 - 2.3.1 Existing Conditions
 - 2.3.2 Potential Impacts
 - 2.3.3 Proposed Mitigation
- 2.4 Impact on Flooding
 - 2.4.1 Existing Conditions
 - 2.4.2 Potential Impacts
 - 2.4.3 Proposed Mitigation

3.0 Human Environmental Resources

- 3.1 Impact on Human Health
 - 3.1.1 Existing Conditions
 - 3.1.2 Potential Impacts
 - 3.1.3 Proposed Mitigation
- 3.2 Impact on Transportation
 - 3.2.1 Existing Conditions
 - 3.2.2 Potential Impacts
 - 3.2.3 Proposed Mitigation
- 3.3 Impact on Aesthetic Resources
 - 3.3.1 Existing Conditions
 - 3.3.2 Potential Impacts
 - 3.3.3 Proposed Mitigation
- 3.4 Impact on Community Character
 - 3.4.1 Existing Conditions
 - 3.4.2 Potential Impacts
 - 3.4.3 Proposed Mitigation
- 3.5 Impact on Open Space and Recreation
 - 3.5.1 Existing Conditions
 - 3.5.2 Potential Impacts
 - 3.5.3 Proposed Mitigation
- 3.6 Impact from Noise

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

- 3.6.1 Existing Conditions
- 3.6.2 Potential Impacts
- 3.6.3 Proposed Mitigation
- 3.7 Impact on Air Quality
 - 3.7.1 Existing Conditions
 - 3.7.2 Potential Impacts
 - 3.7.3 Proposed Mitigation

- 3.8 Social and Economic Impacts
 - 3.8.1 Existing Conditions
 - 3.8.2 Potential Impacts
 - 3.8.3 Proposed Mitigation
- 3.9 Construction-Related Impacts
 - 3.9.1 Description of Proposed Construction Schedule and Activities
 - 3.9.2 Potential Impacts
 - 3.9.3 Proposed Mitigation
- 3.10 Consistency with Community Plans and Studies
 - 3.10.1 Existing Conditions
 - 3.10.2 Potential Impacts
 - 3.10.3 Proposed Mitigation
- 3.11 Impact on Archeological and Cultural Resources
 - 3.11.1 Existing Conditions
 - 3.11.2 Potential Impacts
 - 3.11.3 Proposed Mitigation

- 4.0 Other Required Sections**
 - 4.1 Use and Conservation of Energy
 - 4.2 Adverse Impacts That Cannot Be Avoided (Short-Term and Long-Term)
 - 4.3 Irretrievable and Irreversible Commitment of Resources
 - 4.4 Growth-Inducing Impacts

STRONG'S FINAL SCOPE OBJECTIONS AND RESPONSES

5.0 Alternatives and Potential Impacts

- 5.1 Alternative 1- No-Action
- 5.2 Alternative 2 - Alternative Material Removal Plan Using Barges
- 5.3 Alternative 3 - Construct Project on Another Parcel
- 5.4 Alternative 4 — Construct Proposed Storage Building(s) Without Excavation
- 5.5 Alternative 5 — Construct Smaller building(s) with Less Excavation
- 5.6 Alternative 6 — Reconfigure or Reconstruct Existing Buildings On-site for Larger Boat Storage.

6.0 References