ENVIRONMENTAL ASSESSMENT

REDEVELOPMENT OF FORMER CLINTON COUNTY AIRPORT

Prepared for

CLINTON COUNTY PLANNING DEPARTMENT
Plattsburgh, New York

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This Environmental Assessment becomes a Federal document when evaluated, signed, and dated by the Responsible FAA Official.

Responsible FAA Official: _____ Date: _____

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SECTION 1 - PURPOSE AND NEED

1.1 Background of Project

Until June 2007, Clinton County Airport operated as a general aviation facility serving the City of Plattsburgh, New York and surrounding communities. At that time, the airport was closed and all operations were transferred to Plattsburgh International Airport, which is located approximately three miles to the southeast, and is also owned and operated by Clinton County. Figure 1 shows the location of the former Clinton County Airport and of Plattsburgh International; Airport. To allow for non-aeronautical development of the former airport, the Federal Aviation Administration (FAA) must release the approximately 624 acres of runways, taxiways, aprons, airside facilities, and landside facilities from deed provisions that require aeronautical use. As part of this process, an Environmental Assessment (EA) for the proposed redevelopment is required.

Clinton County (project sponsor) and the FAA, the lead agency under the National Environmental Policy Act (NEPA), have established via the Airport Master Plan for Plattsburgh International Airport that the Clinton County Airport has no aeronautical use and, to maximize the public benefit from the facility, the land will be disposed via public sale. Revenue generated from such disposal shall be utilized at the replacement airport for aeronautical development.

To guide the redevelopment of the former Clinton County Airport, the Town of Plattsburgh Town Board, on July 18, 2011, passed Resolution No. 11-253, to institute an amendment to the Town's Zoning Ordinance and Zoning Map via establishment of an Airport Development District ("ADD"). The ADD sets forth three general categories of land use for the former airport, designated to provide an integrated community with a diverse mix of uses including municipal, institutional, industrial, commercial, residential, conservation, and recreational facilities. Figure 2 illustrates the areas (zoning sub-districts) within the former airport committed to each of the three general categories:

1. The Industrial (Technology/Business) Area Sub-district is comprised of two areas totaling 164 acres (28% of the total ADD). Uses to be permitted in these areas

include Research and Development Centers, Educational Institutions, Business/Professional Offices, Technology Manufacturing, Watchman Dwellings, Parking Garages, and Accessory Uses. The two areas set forth for these developments are along the eastern (77 acres) and northern (87 acres) edges of the former airport and are contiguous with an existing industrial park (eastern) and the NYS Route 3 commercial corridor (northern). The principal roadway through the ADD will connect the industrial sub-districts with adjacent industrial and commercial areas.

2. The Mixed Use Area Sub-district is 278 acres (47% of the total ADD) in the central portion of the property. Permitted uses in this area include dwelling units ranging from single-family to multi-family, and a wide variety of commercial, institutional, entertainment, and business/professional uses.

3. The Conservation Area Sub-district is comprised of two areas totaling 148 acres (25% of the total ADD). Permitted uses in this area include Environmental Education and Public Recreational Facilities consistent with the preservation in perpetuity of the area's natural resources. These areas include the entire Saranac River frontage (approximately 7,000 linear feet) and the extensive wetland area in the southeast portion of the ADD.

Article XV of the Town's zoning ordinance describes the goals of the ADD and details the specific requirements that will guide the development within each of the sub-districts in the ADD. Article XV and Resolution No. 11-253 are provided in Appendix D,. Guidelines set forth in Article XV include building density, landscaping, screening/buffering, street frontage treatments, lighting, viewshed protection, gateway treatments, pedestrian access, parking, and roadways. These guidelines provide the framework for the Town Planning Board to assess the acceptability of specific redevelopment projects within the ADD. For the purpose of this EA, Article XV provides the means for generally assessing the potential significance of environmental impacts associated with the planned non-aeronautical uses of the facility. For this reason, the redevelopment scenario analyzed in this EA reflects the mixture of industrial,

commercial, residential, conservation, recreational, and educational uses set forth in the amended zoning ordinance.

Appendix D also includes a New York State Environmental Quality Review Act (SEQRA) Environmental Assessment (Long Form) and Negative Declaration, completed by the Town of Plattsburgh for the project. After the FAA releases these former airport lands from the existing deed restrictions, the specific projects undertaken by private entities to develop these lands must not only be compatible with the Article XV guidelines, but will also be subject to, at a minimum, additional environmental review under the New York SEQRA

In October 2009, Clinton County submitted to the FAA a draft EA for Redevelopment of the Former Clinton County Airport. That effort was based on a redevelopment plan conceived by the Development Corporation, a non-profit 501(c) corporation, but was deemed by the FAA to be not adequate for a reasonable assessment of potential impacts of redevelopment. In early 2010, Clinton County solicited proposals from potential developers for redevelopment projects in the ADD. Two proposals were tendered to the County in response to this request, neither of which provided a comprehensive approach to developing the property, and neither of which was considered acceptable by the County. Based on this history, and given the existing economic environment, there is no known private entity capable of implementing a comprehensive redevelopment of the entire former airport within the short term. Therefore, the development vision set forth by the Town of Plattsburgh Planning Department in the ADD, and codified in the Town's amended zoning ordinance, provides the framework for a comprehensive, long term, redevelopment of the property.

In December 2009, C&S Engineers, Inc. submitted a *Wetlands and Waterways Delineation Report* for the 17.5 acre portion of the property at the Rugar Street entrance. That area was designated for subdivision and transfer to the Champlain Valley Technical Institute, which is the current tenant. The current use of that tract and buildings is for an aircraft maintenance school, which is consistent with the present requirement that the former airport property be used for aeronautically-related purposes. The report identified one-half acre of wetlands loss associated with completion of the entry roadway, which would require mitigation. The NYSDEC issued a

December 22, 2009 letter accepting the wetland delineation and conceptual development plan and discussing mitigation. Under the amended zoning ordinance, this area is within an Industrial Sub-district area, and the intended use as an educational institution is consistent with allowable uses in such an area. Therefore, these documents would be applicable to the current Proposed Action. The December 2009 *Wetlands and Waterways Delineation Report*, and the associated NYSDEC approval/comment letter, are provided in Appendix F.

SECTION 2 ALTERNATIVES

2.1 No Action

Under this alternative, the existing deed restrictions would remain in place and the facility would be maintained as at present: a predominantly vacant facility requiring maintenance of the few existing FAA and aeronautically-related functions. Because non-aeronautical development would not be permitted under this scenario, the facility would continue to require public funds for required maintenance while providing little public benefit. Because the facility is closed with respect to active aeronautical use, airside and landside facilities (runways, taxiways, aprons, obstruction-free areas, hangars, security fences, terminal and support buildings, etc.) would not be maintained and would continue to deteriorate. In the short term, the FAA would continue to maintain the existing Very High Frequency Omnidirectional Range (VOR) Station at the facility, although it is anticipated that this facility will soon be moved or abandoned. Existing aeronautical-related uses, such as the aircraft maintenance school, might continue, but the facility for the most part would remain vacant.

2.2 Proposed Action

The proposed action would return the facility to beneficial public use via a mixture of commercial, industrial, residential, educational, conservation, and recreational developments, consistent with the Town of Plattsburgh's ADD and amended zoning ordinance. Based on the scope of the entire build-out, and on the current economic outlook for the region, the complete redevelopment of the facility would be implemented over a relatively long period of time (25-50 years). The acceptable land uses set forth in the ADD for the facility, illustrated on Figure 2,

constitute the Proposed Action, the scenario used for assessing environmental impacts. The discussions that follow, and the associated acreages of various land use for the project, assume a reasonable apportionment of the range of allowable land uses within each sub-district, and that the land presently occupied by the VOR facility will be included in the developments.

The initial actions associated with the redevelopment would be the removal of the majority of the airport-related above ground and below-ground structures, perhaps except those needed to support the VOR in the short-term, or those that could be incorporated into the redevelopment (e.g., storm water handling facilities and some subsurface utilities). The majority of infrastructure improvements would be installed during the initial redevelopment phase, including two major roadways (totaling approximately 12,800 linear feet), cross streets (approximately 5,400 linear feet), storm water drainage, community lighting, telecommunications, water supply, wastewater infrastructure, and electric and natural gas distribution.

The re-development plan for the mixed use sub-district (total 278 acres) in the ADD includes approximately 93 acres of residences, which would provide a total of 444 residential units, comprised of 62 single-family units, 134 duplex/townhouse units, and 248 multi-family units. The ADD provides density, siting, parking, landscaping, and lighting guidelines associated with each of the residential classifications. Also included in the mixed use area would be 93 acres devoted to commercial (including office, retail, and entertainment/hospitality) development. These businesses would be concentrated along the major roadways and would provide services for occupants within the proposed development as well as from surrounding communities and would include parking for approximately 800 automobiles. The final component for the mixed use area would be educational or institutional establishments (totaling 92 acres) including schools, public buildings, recreational facilities, community centers, and assisted-living facilities.

The industrial use sub-district provides 164 acres for light industrial developments in two separate development parcels, including roadways. The ADD allows up to 20,000 square feet of structural footprint per acre in the industrial sub-district, which could theoretically accommodate (subtracting 20% of total acreage for roadways/parking) approximately 2.6 million square feet of industrial facilities.

The re-development plan includes a total of 148 acres of dedicated conservation area. While no specific purposes have been ascribed to these spaces, their proximity to the residential and commercial parcels indicates that inclusion of these parcels would enhance aesthetic, conservation, and recreational values of the over-all development. The conservation areas include all of the New York State Department of Environmental Conservation (NYSDEC)-regulated wetland areas, with the exception of the ½ acre of wetland that would be impacted by the extension of the entrance road at Rugar Road (see Appendix F). The conservation areas also include all of the lands directly bordering the Saranac River. The amended zoning plan for the ADD allows for recreational and environmental education facilities consistent with the protection of natural, cultural, and visual resources. For this analysis, we assume that the complete redevelopment in this area includes 12,000 feet of unpaved trails, two small canoe/kayak launch sites, and a 5,000 square-foot nature center.

Based on the current pace of residential and business development in Clinton County, a forecast of a minimum 25-year period for complete redevelopment of the former airport does not appear overly conservative, barring the emergence of one or more major industrial entities capable of large-scale business development. Therefore, the full build out of each component described in the amended zoning ordinance for the ADD constitutes the most feasible scenario for assessing potential environmental impacts associated with the redevelopment of the property.

2.3 List of Anticipated Permits and Approvals

The initial step in redeveloping the facility is the release of the existing deed restrictions by the FAA. The release from deed restrictions may not initially include the portion of the property (approximately 74 acres) used to support the VOR; the release of the deed restrictions on those lands would be completed upon the eventual relocation or abandonment of the VOR facility. Following that eventual relocation or abandonment, the County, or the subsequent purchaser of those lands, would be able to include that portion of the property in subsequent redevelopment. This analysis assumes that the VOR facility will be actively maintained by the FAA for a limited period of time and that, following its removal or relocation, restriction as to the use of the lands within the 1,000-foot-radius surrounding it will be removed.

During the redevelopment work, any excavation or placement of fill below the mean high water level of the Saranac River, a permit pursuant to Article 15-05 of the New York State Environmental Conservation Law (ECL) will be required. A permit would also be required under Article 24 of the ECL for any construction activities in or adjacent to (within 100 feet of) the state regulated wetlands at the site; those activities may also require a Department of the Army Permit in accordance with 33 CFR 320-332. Water Quality Certification pursuant to Section 401 of the Clean Water Act will also be required, as will be a permit pursuant to Article 17 State Pollutant Discharge Elimination System (for stormwater discharges related to construction activities).

Depending on the proposed specific activities of the site developer or individual tenants, other state or local permits or registrations may be required, such as those associated with construction impacts, air emissions, the generation or disposal of solid and hazardous materials, petroleum or chemical bulk storage, and wastewater or storm water discharges..

SECTION 3 AFFECTED ENVIRONMENT

3.1 Project Location and Site Description

Figure 1 provides the location of the former Clinton County Airport (the Site) within the Town of Plattsburgh in Clinton County, New York. The site appears on Figure 1 as the Plattsburgh Municipal Airport; subsequent figures are based on an aerial photograph, and provide details regarding adjacent land forms, structures, and land uses. The site is bounded as follows:

- To the north by the Route 3 (commercial and residential) corridor and part of an industrial park;
- To the east by an industrial park and an approximately 250-unit mobile home development;
- To the south by vacant land and the Saranac River; and
- To the west by the Saranac River, the Clinton County Fairgrounds, and (at the extreme northwestern corner) a small community of single-family residences.

Existing entry points to the site are the NYS Route 3 entry road which previously provided access to the terminal area and by an access road off Military Turnpike at Rugar Street which provides access to several Champlain Valley Education Services buildings. The main thoroughfare within the redeveloped property would connect those two entrances and would serve as the hub for the secondary roads within the property.

Inquiry at the Clinton County Historical Museum, and inspection of historical maps, indicate that, prior to the appropriation of land for development of the airport during the middle years of the 1940's, the land was largely vacant farmland and woodland with several residential or agricultural structures. Prior to development of the former airport, Rugar Street extended through the site to a point near the Saranac River in an east-west orientation (1913 Topographic Map) and Old Sunrise Road traversed the site in a north-south orientation. It appears that as

many as six structures (assumed to be residences or agricultural buildings) were located at the site prior to the land being appropriated for the airport. Each of those structures was apparently removed as part of the airport development.

The site presently includes 38 structures (or clusters of structures) associated with the aeronautical uses of the facility. None of the structures appear to pre-date the establishment of the airport. These structures were inventoried in the 2009 Environmental Due Diligence Audit (EDDA) completed for the site by C&S Engineers, Inc., and range in size from approximately 50 square feet to approximately 25,000 square feet. Several of these structures are currently being use (one for temporary storage of road sand by the town of Plattsburgh Highway Department and another by the Champlain Valley Educational Services) although the majority of structures are abandoned and vacant. The EDDA identified Recognized Environmental Conditions or Suspect Recognized Environmental Conditions associated with several of the structures, including conditions associated with past waste disposal activities and with fuel storage infrastructure. It is assumed that those conditions will be assessed in a comprehensive manner via focused structural and subsurface investigations and tank closures, and remediated as appropriate, as part of the site redevelopment process.

3.2 Area Land Use and Demography

Area Land Use

Figure 4 illustrates general land uses near the site, based on the Town of Plattsburgh's zoning designations. The land uses are typical for the suburban/rural fringe associated with a relatively low density metropolitan area and include several residential communities (single family homes and mobile/prefabricated homes), an industrial park comprised of over thirty businesses, and commercial establishments located along the Route 3 and Military Turnpike corridors. Champlain Valley Educational Services maintains a vocational training complex at the southwestern corner of the Route 3/Military Turnpike intersection and the Clinton County Fairgrounds maintains a complex of agricultural exhibit structures and a non-paved racing oval immediately west of the site. The large vacant and predominantly forested property south of the former airport (between the former airport and the Saranac River) appears to have a network of

rudimentary truck/ATV paths and also appears to include one inactive sand / gravel pit. The land across the Saranac River from the site also appears to be vacant and several more gravel pits appear ti have been developed in that area.

A residential community to the northwest of the site provides approximately 50 single-family homes of relatively recent construction in a low-density suburban, partially forested setting. To the southeast of the site, a residential community of approximately 250 mobile and modular homes is interspersed with commercial and recreational facilities along Military Turnpike/Church Street south of Rugar Street.

The Development Corporation, a non-profit 501(c) corporation, has been instrumental in development of the industrial park located northeast of the site. The modern, predominantly warehouse-style structures are either owned by the Corporation and leased to the individual businesses or owned directly by the businesses. An informal survey of these businesses conducted in November 2010 indicated that this industrial park appeared to be approximately 80% occupied.

At the site entrance off Military Turnpike Road and adjacent to Rugar Street, two large hangar-style structures and several smaller structures were being renovated in June 2009 as an aircraft maintenance educational facility under the auspices of the Champlain Valley Educational Services. The development of this facility, along with additional educational institutions is part of the overall redevelopment plan (proposed action) for the site.

The Clinton County Fairgrounds borders the former airport to the northwest. The Fairgrounds have a dedicated entry road off NYS Route 22B and include Saranac River frontage immediately upstream of the former airport's river frontage.

Clinton County is in the Northern New York Agricultural Region. According to the USDA 1992 Soil Survey for Clinton County, approximately 26% (173,000 acres) of the County's lands were in agricultural production in 1987. Data from the 2002 census of agriculture list 168,500 acres as being in farmland at that time, with 604 farms averaging 279 acres per farm. Approximately 49% of the farmland acreages are used for crops, with approximately 39% being woodland, 6% pasture, and 6% "other" (which could include wetlands, quarries, wildlife areas, or roads).

According to the US Forest Service, approximately two-thirds of Clinton County's lands are considered to be commercial forest lands, used for logs, pulpwood, and fuel wood.

Demography

The US Census Bureau has compiled data for Clinton County, New York and the Plattsburgh, NY Micro Area, including the following (deemed to be relevant to the discussions in this EA):

- The 2010 US Census Bureau data indicate that the Clinton County population (82,128) increased by 2.8% during the decade beginning in 2000 census (the NYS population increased by 2.1% over the same period);
- The population density for the County in 2010 is listed at 79 persons per square mile, which is approximately 19% of the New York State average population density (415 persons per square mile);
- The County population is estimated to be comprised of 92.5% white persons (compared to 65.7% for NYS as a whole), with 3.9% of the population listed as black persons (15.9 % for NYS) and 2.5% of Latino or Hispanic origin (17.6% for NYS);
- The County homeownership rate in 2010 was estimated at 71.2% (compared to the NYS rate of 55.7%), with the median value of owner-occupied housing units in the County estimated at $112,400 (compared to $300,600 for NYS). Compared to the 2000 data, the median house or condo value in the County had increased approximately 25% during the decade and the statewide median value had increased approximately 40% ;
- Approximately one-third (32%) of the housing units in the County were built prior to 1940;
- The median household income for the County in 2009 is estimated at $45,740 (compared to $54, 554 for NYS) and 14.1% of the County's population is listed as below the poverty level (14.2% for NYS); and

- Private non-farm employment in 2008 is listed as 26,346 for Clinton County, an 11.9% increase from the 2000 employment level (compared to a 3.6% increase for NYS as a whole).

- The NYSDEC identifies an area generally to the east of the former airport, and including much of the former airport, as a potential Environmental Justice Area, indicating the presence of a minority or low-income population that could be adversely impacted by development within or near the area. The NYSDEC's Environmental Justice program sets forth guidelines for public participation in such areas so that Environmental Justice issues are addressed.

According to the New York State Department of Labor, the unemployment rate for Clinton County was 8.8% in August 2011, an increase in unemployment of 2.6 % compared to April 2008, but an improvement (decrease of unemployment) of 0.6% from April 2009. The unemployment rate for NYS as a whole was 8.0% for August 2011, an increase of 3.2% from the April 2008 rate.

The Plattsburgh-North Country Chamber of Commerce and the Quebec-New York Corridor Coalition produced a 2004 assessment of the economic impact of Canada on Clinton County, New York, which showed a total economic impact to Clinton County from Canada of $1.53 billion in 2004, compared to $784.5 million in 1994. The assessment provided the following additional data and conclusions:

- Export sales to or through Canada from Clinton County were $525 million in 2000, compared to $72 million in 1987;

- 14% of Clinton County's total employment in 2004 worked for Canadian-owned businesses, compared to 7.5% in 1994. The total payroll of those businesses in the county increased from $60 million to $160 million over that time period;

- Canadian-owned businesses contributed over $5 million dollars in property taxes in Clinton County in 2004, compared to $570,000 in 1994 and reported rental payments of $4.2 million in 2002 compared to $1.1 million in 1994;

- $88 million in Canadian natural gas was consumed in Clinton County in 2004, compared to $31.5 million in 1994;
- The location of Plattsburgh near the Canadian border in the corridor between New York City and Montreal provides unique opportunities to support many aspects of U.S.-Canadian economic interactions.

3.3 Geology and Topography

According to the 1966 USGS 7.5 Minute Series topographic map for the Morrisonville Quadrangle, the developed areas of the former airport range in elevation from approximately 340 feet to 360 feet above mean sea level (AMSL). Elevations decline in the undeveloped areas on the airport property to a low of approximately 300 feet AMSL along the Saranac River. Contours are gradual (0-3%) over the developed portion of the site. Along the western boundary of the site, a relatively steep bank roughly delineates the edge of the floodplain associated with the Saranac River. The slope becomes more gradual along the more southerly portions of the site riverbank, where a broader floodplain is present.

Figures 5a and 5b provide maps of the regional bedrock and surficial geology features, respectively. Geologically, the site is located within the Beekmantown Group, which are Lower Ordovician dolostones and dolomitic limestones. This bedrock is overlain with river, lake, and marine deposits. The river deposits, present in the western portion of the site, are oxidized, permeable fine sand to gravel. These deposits are generally confined to flood plains within the river valley, and may be overlain by silt. They are subject to flooding with a thickness of 1 to 10 meters. The lake and marine deposits, present over the remainder of the site, are well sorted, stratified, fine to medium sand. These deposits may include fossil shells, may be brackish to salt, and are permeable with a variable thickness from 2 to 20 meters.

3.4 Soils

Figure 6 illustrates the distribution of the various soil types found at the site, according to the United States Department of Agriculture (USDA) Natural Resources Conservation Service Web Soil Survey. The predominant soils within the subject parcel boundary include:

- Uh – Udorthents, wet substratum (62%); this well drained to somewhat poorly drained unit is comprised of loamy sediments and is predominantly associated with urban areas and fills;
- AbA - Adams Series (19%); this map unit consists of very deep and somewhat excessively drained soils on nearly level sandy glacial outwash plains and terraces;
- Wn - Wainola Series (5%); this very deep, nearly level, and somewhat poorly drained soil is formed in sandy deposits on relatively low and slightly concave areas of glacial outwash plains and lake plains;
- Fn - Fluvaquents-Udifluvents (4%); these soils are very deep sediments deposited by rivers and streams on floodplains;
- CxA - Croghan Series (4%); this very deep, moderately well drained soil formed in low lime, sandy deposits on outwash plains, terraces, deltas, and lake plains; and
- CvA and CvB - Coveytown Series (3%); this very deep, nearly level to gently sloping soil occurs at the base of glacial till deposits that have been modified by wave actions and by the deposition of sands.

Other soils series reported for the site, each present at 2% or less of the site's surface include the Fahey Series (1%), the Mooers Series (2%), and the Sciota Series (1%).

3.5 Biotic Resources

The previously developed portions of the site (runways, taxiways, hangars, aprons, entry roads, and open spaces adjacent to these developed features) have been maintained for approximately sixty years as airport infrastructure. Unpaved and structure-free areas have been maintained

through regular mowing and tree topping/removal as open spaces and FAA-required object-free zones. Drainage of these areas has also been enhanced via construction of ditches and subsurface conveyances as necessary to avoid surface retention of water. The objectives of these maintenance activities include maintaining safe conditions for aircraft operations and to discourage use of these areas by wildlife, some of which can be a danger to aviation. Therefore, at this time, the natural resource values associated with biotic communities in these areas are minimal. These biotic communities can be categorized as open field and early successional meadows, distinguished for the most part, by the frequency and extent of mowing and woody vegetation removal. These areas constitute, along with existing areas of pavements and structures, the majority of the land zoned "mixed use" or "industrial" under the amended zoning plan associated with the ADD redevelopment plan (proposed action).

The Saranac River forms the western boundary of the site for a distance of approximately 7,000 feet. A natural, predominantly forested, buffer exists between the river and the developed portions of the former airport. The river and forested buffer, ranging in width from approximately 250 feet to approximately 1,400 feet, are comparatively undisturbed biotic communities with significant natural resource values. The Saranac River, which originates in the Adirondack Upland near Saranac Lake, drains much of central Clinton County and empties into Lake Champlain at Plattsburgh. The Saranac River is a New York State Class C water body in the reach bordering the site, defined by NYSDEC as between the Imperial Wallpaper Mills Dam (approximately one mile downstream from the site) to the Morrisonville power dam (approximately one mile upstream from the site). The USGS maintains a streamflow monitoring station on the Saranac River several miles downstream of the site at an elevation of approximately 156 above sea level.

The lands bordering the Saranac River have not been developed for airport use or compatibility and remain as a comparatively undisturbed deciduous hardwood forest, traversed by minimally-used ATV trails and wildlife paths. Public use of these lands has been discouraged via security fences and limited roadway access points, which has aided in maintaining the natural values of these areas. These lands constitute a mature forest vegetative buffer along the reach of the river that constitutes the western property boundary south of the Clinton County Fairgrounds. Further

south, the floodplain associated with the Saranac River extends further inland. A NYSDEC-regulated wetland (MV-17), apparently not directly connected to the riparian wetlands along the river, is present at the southeastern corner of the property. Figures 7 and 8 provide the location and extent of regulated wetlands and floodplains at the site. Since the areas described in this section are within the 148 acres set aside for conservation purposes under the Town of Plattsburgh's ADD Amended Zoning Plan, these biotic communities would be largely unaffected by the construction associated with the proposed action.

According to the USDA's 1992 Soil Survey of Clinton County, potable water in the project area is obtained from a variety of surface and underground sources, with the City of Plattsburgh utilizing surface water sources from the Mead and Patterson reservoirs near West Plattsburgh (approximately 3 miles to the northwest from the site) and the Town of Morrisonville utilizing well water from subsurface aquifers. The USGS maintains a groundwater monitoring well in the Clinton County Town of Altona, approximately 12 miles north from the site. The monitoring well is installed to a depth of 78 feet below the ground surface into the local sandstone aquifer. During the period of record (1992 to present), water levels in the well ranged from 20.13 feet to 24.47 feet below the land-surface datum.

The Town of Plattsburgh Tax Map indicates that parts of the former airport property are served by the following special service districts:

- Morrisonville Water District;
- Treadwell Mills Water District;
- Route 3 Sewer District;
- Beekmantown Central School District;
- Treadwell Mills Light District; and
- Morrisonville Fire District

SECTION 4 ENVIRONMENTAL CONSEQUENCES

4.1 Noise

None of the planned uses of the facility (light industrial, commercial, educational, residential, and recreational) would be categorically expected to be associated with noise impacts. Construction-related noise impacts would be possible, although the only adjacent land use that might be considered noise sensitive would be the Champlain Valley Educational Services (vocational training institute) buildings. It is assumed that noise impacts associated with construction can be maintained below threshold levels by requiring construction contractors to limit construction to daylight hours and weekday time periods and to require industry standard noise abatement controls for all construction machinery. With those restrictions in place, there should be no significant noise impacts associated with the development.

4.2 Compatible Land Use

Each of the planned uses for the redevelopment of the airport, both in the short-term and long-term, is compatible with the existing land uses in adjacent areas and nearby communities and consistent with the uses set forth by the Town of Plattsburgh in the ADD Amended Zoning Plan. The mixture of redevelopment components that is codified in the amended zoning plan is intended to reflect a balance of residential, commercial, industrial, educational, institutional, and recreational uses that, in total, will comprise a viable redevelopment strategy and, eventually, create a desirable place to live and work. All local stakeholders, including local governments and the private sector, have contributed to the development of a the Master Plan for the adaptive re-use of the former airport, which has been codified by The Town of Plattsburgh through amended zoning for the property. Therefore, since these local entities would determine what land uses are compatible, and would have review and approval authority over specific portions of the development as they are proposed, designed and built, no incompatible land use issues would be anticipated under the proposed action.

4.3 Social Impacts/ Environmental Justice

Figure 3 indicates that the majority of the former airport is within a potential Environmental Justice Area identified by the NYSDEC. This area is apparently associated with the low income community located southeast of the former airport. While there is no component of the proposed action designed specifically to enhance economic or social opportunities for this low income community, there is also no evidence to indicate that the proposed redevelopment would adversely affect this community. The roadway development through the redeveloped former airport would be designed to facilitate movement to and from the NYS Route 3 corridor and would not appear to be likely to adversely affect traffic patterns within the potential Environmental Justice Area. Businesses and residents within the potential Environmental Justice Area would continue to utilize the Military Turnpike corridor to access Route 3 and would not appear to be adversely affected by the proposed development.

The developments of the proposed action are intended to benefit the entire Clinton County/Plattsburgh community by returning the lands of the former airport to the local tax base and by providing lands for economic development (commercial and industrial), residential development, and for educational, institutional, conservation, and recreational use. Since there are no established communities within the former airport, and no established communities outside the boundaries of the former airport will be displaced or inconvenienced for these developments, it would appear that no community of any demographic description would be adversely affected. Therefore, no adverse social impacts or environmental justice issues are anticipated.

4.4 Induced Socioeconomic Impacts

Due to the balance of mixed uses associated with the proposed action, and to the inclusion of significant infrastructure enhancements and expansion of the local tax base, any shifts in the patterns of population movements or growth, demands for public services, or changes in business and economic activities, should be positive. These developments are compatible with the present mix of land uses in the community and the population density of the developed site would be similar to that in adjacent developed areas. Effects to ecosystems are also expected to be

positive, since areas that currently have high value in that regard will be preserved and other areas that are currently degraded due to activities of the former airport would likely improve over time as legacy environmental issues associated with the former airport are remediated and as infrastructure improvements and new uses are instituted.

The 2010 US Census Bureau data indicate that in 2009 there were 34,949 housing units in Clinton County, with 7,269 (20.8%) of those units being in multi-unit structures. The estimated total housing build-out for the former airport property, as presented in Section 2.2, would add a total of 444 housing units, and 382 of those units would be in multi-unit structures. Therefore, the proposed development would constitute a maximum 1.3% increase in available housing to the County or would replace an equal number of aging structures. In terms of multi-unit structures, the proposed developments would increase the supply of such structures in the County by approximately 5.3% at total build-out, or likewise replace an equal number of aging structures.

4.5 Air Quality

Clinton County and the Plattsburgh area are not listed by the New York State Department of Environmental Conservation as being non-attainment or maintenance areas for either of the two air quality criteria contaminants (ozone and fine particulates) for which the state is required to provide a State Implementation Plan under the Clean Air Act. Since the region is in attainment for these pollutants, and since there are no apparent stationary sources of air emissions associated with the proposed action, no significant air quality impacts are anticipated for this project and no further actions with respect to compliance with air quality regulations are anticipated. Any specific industry or entity that might inhabit the site in the future, and that might include combustion units exceeding state-listed thermodynamic thresholds, or emit any air quality contaminant at levels exceeding state-listed thresholds, would be required to obtain a Facility Permit from the NYSDEC to monitor and/or control those emissions.

4.6 Water Quality

4.6.1 Surface Water

The developer or developers who undertake implementation of the proposed action will be required to prepare a Stormwater Pollution Prevention Plan (SWPP) and obtain a permit for construction-related discharges of storm water to the environment. The total of low permeability surface areas associated with the redeveloped site would be roughly equivalent to the total low permeability surfaces associated with former airport, resulting in a similar response of the area to precipitation events. Furthermore, if the NYSDEC concludes that the storm water control infrastructure to be constructed to serve the redeveloped site (assumed to include catchbasins, subsurface conveyances, surface conveyances, and retention basins) constitute a point-source discharge to the environment, the developer could be required to obtain and maintain a permit for these discharges under the State Pollutant Discharge Elimination System (SPDES) regulations.

Wastewater discharges from residences or from commercial, industrial, or institutional structures built as part of the proposed action would be required to comply with the sanitary or industrial pre-treatment requirements of the Publicly-Owned Treatment Works (POTW), under whose SPDES permit the treated wastewater would be discharged.

There are no planned activities associated with the proposed action for the site that would require dredging, fill, or excavation within or directly adjacent to the Saranac River. If any such plan is conceived in the future, such as a public boat launch or dock associated with a recreational development along the river, a joint permit from the NYSDEC and the US Army Corps of Engineers would need to be acquired for that work.

Adherence to the requirements of the above-listed regulatory entities should be sufficient to ensure that no significant adverse impacts to surface water resources would be associated with the proposed action.

4.6.2 Groundwater

The USGS maintains records for one bedrock groundwater monitoring well in Clinton County, for which the depth of groundwater showed little seasonal or annual fluctuation and remained at

levels greater than twenty feet below the ground surface over fifteen years of monitoring records. The site redevelopment at the former airport will utilize established public water supplies that are readily available in the area, and will require no extraction of groundwater from the site's subsurface. Since no groundwater extraction is anticipated at the site as part of the redevelopment, there should be no effects to local groundwater levels or quality. The depth to groundwater also indicates that there should be no impacts to any of the proposed redevelopment activities, which are not anticipated to require deep cuts or bedrock removal. Therefore, impacts to groundwater would not be anticipated to be significant.

4.7 Section 4(f) Lands

All of the lands that would be dedicated to the proposed action have been maintained as part of the former airport. None of the lands proposed to be utilized for this redevelopment project are, or have apparently been, part of a publicly-owned park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance. Furthermore, as detailed in the following section, there do not appear to be any lands that are associated with a historic site of national, state, or local significance within the area of the proposed action. Since no lands meeting the definition of Section 4(f) resources are associated with these developments, no findings with regard to *de minimis* impacts are needed to determine that there would be no adverse impacts associated with this category of potential impacts.

4.8 Historic, Architectural, Archaeological and Cultural Resources

As part of the agency consultation process for this EA, the New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP) was requested to provide information regarding the known presence of historic, architectural, archaeological, or cultural resources at the site. In addition to that formal request, a separate web-based inquiry via the public GIS program maintained by NYSOPRHP was also undertaken and a personal interview was held with a staff historian at the Clinton County Historical Museum.

The October 12, 2010 NYSOPRHP response is provided in Appendix C. NYSOPRHP assigned project number 10PR06356 to the project. The archaeology comments from NYSOPRHP

indicated the presence of an archeological site in or adjacent to the project area. In their response, the NYSOPRHP provided the following comments/requests for information:

- Based on the reported resources, the Office recommended a Phase 1 archaeological survey was warranted for portions of the property that would involve ground disturbance, unless sufficient evidence of previous ground disturbance could be provided; and
- The Office requested that clear, original photographs be provided of all 50+ year-old buildings on or adjacent to the site, with exact street addresses and a keyed site map provided for each building identified. Off-site areas designated by the Office included both sides of Routes 3/22B north of the site and on both sides of Rugar Street and Military Turnpike Road east of the site.

Previous Archeological Surveys On or Near the Site

Discussions with personnel associated with the former airport, and research into documents associated with past archaeological investigations/surveys at and near the site, associated with previous site projects and recommended by NYSOPRHP, indicate the following:

- There are six historic OPRHP sites (A019.12.000622, A019.12.000625, A019.12.000626, A019.12.000627, A019.12.000628, A019.12.000629) dating from the 19th century, located along Rugar Street east of the site. One additional OPRHP site (A019.14.00010) is located along the Old Military Turnpike extension approximately one mile southeast from the site.
- The New York State Museum lists one pre-contact site (#3086), identified by A.C. Parker in 1920 as a village site, "a mile east of Morrisonville and on the northeast side of the Saranac River". This site appears to have been identified by Parker based on a previous description by William Beauchamp in 1900 (*Aboriginal Occupation of New York. New York State Museum Bulletin No. 32. Albany, New York, p.56-57*)

- A 1977 Phase 1 archaeological investigation was conducted by the Anthropological Survey New York State Museum Science Service SUNY Potsdam along the Route 3 corridor, including the area directly north of the site. No pre-contact or significant historic cultural remains were encountered and no further archaeological investigations were recommended.

- In December 1984, the Division of Historical and Anthropological Services at the New York State Museum conducted a cultural resources management survey for the Saranac River bridge replacement on Military Turnpike in Treadwell Mills. No pre-contact or significant historic cultural remains were encountered and no further archaeological investigations were recommended.

- In August 1992, a Phase 1 archaeological investigation was conducted at the site for Clinton County by Werner Archaeological Services for an airport obstruction removal project. This project covered approximately 35 acres west of the main runway (Runway 1-19). The Phase 1A portion of this survey concluded that a Phase 1B Field Investigation was warranted based on the aforementioned Beauchamp/Parker reference, but that "the amount of recent disturbance (within the past fifty years) indicated by documents relating to the airport's history and visual inspection of the site is a major factor mitigating against the survival of any features with preserved archaeological contexts". A Phase 1B investigation comprised of 118 excavated test pits was conducted. No pre-contact or significant historic cultural remains were encountered and no further archaeological investigations were recommended.

- In August 1996, a Phase 1 archaeological investigation was conducted by Edward V. Curtin for a proposed gas line, portions of which were located along the Route 3 corridor and Tom Miller Road north of the site. No pre-contact or significant historic cultural remains were encountered along those sections of the gas line corridor and no further archaeological investigations were recommended.

- In September 1998, a Phase 1 archaeological investigation was conducted by the Anthropological Survey New York State Museum for the Rugar Street bridge spanning I-

87 approximately one mile east of the site. No pre-contact or significant historic cultural remains were encountered and no further archaeological investigations were recommended.

- In November 2000, a Phase 1 archaeological investigation was conducted by Hartgen Archaeological Associates for an airport obstruction removal project at the site. Two of the three site work areas were judged to be of low sensitivity for pre-contact or historical resources due to lack of historic map evidence, co-location of wetlands, and/or prior disturbance. In the third (14 acre) work area, 154 shovel tests were excavated and several small historic artifacts (none indicative of pre-contact civilization) were recovered from the Stratum 1 plow zone, none associated with any intact features. No further investigations were recommended for the historic finds.

- Based on information provided by airport personnel, there is a historic site consisting of a dry-laid stone foundation and a hand-dug well in the western portion of the site, a relatively undisturbed wooded area to the south of the Clinton County Fairgrounds. This area is indicated to be conserved as open/green space in the long-term development plan and is not included in the developments for the proposed action.

Additional Information Associated with Buildings/Structures/Districts

Approximately thirty-three on-site structures, related to aeronautical uses, are located within the area of the proposed development. Of these thirty-three structures, five have been identified via historical aerial photography as potentially being fifty years or more old. In the off-site areas designated by NYSOPRHP in their October 12, 2010 correspondence (Appendix C) for further investigation, the Clinton County Real Property Office Database identified twenty-two buildings as being greater than fifty years old. Appendix E provides the Additional Information requested by NYSOPRHP as part of the Office's Project # 10PRO6356.

Conclusions

In addition to the past ground disturbances associated with the structures, the land designated for active development within the proposed project area has been extensively graded and is presently

covered by paved surfaces (runways, taxiways, aprons, and service roads) associated with former aeronautical developments. The vast majority of other areas to be utilized for the "built community" associated with the proposed action have been previously built upon, or otherwise cleared, grubbed, graded, and maintained as open vacant space compatible with airport operations. Utility infrastructure associated with the former airport, including electric, communications, public water, storm water, and the VOR are primarily underground.

The findings of the previous archaeological investigations discussed above, and the predominance of prior ground disturbance throughout the area of the proposed action, indicate that the potential for historic and/or archaeological resources in the area of the proposed action is minimal. It appears that the 1-mile diameter "sensitivity" buffers that infringe on the project area (shown on Figure 9) were applied by SHPO based on the past archaeological surveys, of which there were many, and none of which indicated evidence of pre-contact or Native American culture. Therefore, no significant impacts to these resources should be expected. With respect to the redevelopment plan, areas that have not been disturbed by airport developments are generally planned to be conserved as green space, conservation areas, or minimal-impact recreation areas. These areas most closely correspond to the areas mentioned in literature (i.e., along the east bank of the Saranac River) as having the potential for archaeological resources to be present. Thus, the lands most likely to be associated with archaeological sites will apparently not be significantly impacted by the project.

4.9 Biotic Communities

Within the portion of the over-all site that will be dedicated to the active development plan (the proposed action), the vast majority of the land has been previously disturbed and devoted to airside and landside developments associated with the former airport. The two biotic communities present in this area, open fields and early successional meadows, are distinguished for the most part by the frequency of mowing and periodic woody vegetation removal that has been conducted in maintaining the area for aeronautical purposes. In a regional context, these types of biotic communities are not common and, where present, may be associated with agricultural fields or pastures where the agricultural practices have been discontinued.

The principal biotic community present in portions of the site that have not been extensively developed for aeronautical purposes is the deciduous hardwood forest, which is also the predominant biotic community on a regional basis. A New York State-regulated freshwater wetland (MV-17) is also present at the site. Disturbance of these communities over the past sixty years (the period during which the airport has managed the property) would have been limited mainly to topping of trees with some tree removal as required to maintain FAA-mandated obstruction-free zones. Both the deciduous hardwood forest and freshwater wetland communities maintain significant natural resource values. Under the proposed action, neither of these biotic communities would be significantly impacted since there is no development planned in the wetland areas or forested areas. The vast majority of these areas are reserved as open space conservation areas, with smaller portions planned for minimal-impact recreational uses (e.g., hiking, bird-watching), and some fringe areas included in mixed use development.

The redevelopment plans specify that 148 acres of the 624-acre site would be dedicated to Conservation Areas (see Figure 2). That area consists of the portion of the property that was minimally compromised by previous airport-related development and activities and, at present, contains the highest biotic resource value. In the mixed use (278 acres) portion of the site, the redevelopment plan requires buffer and open areas and protection of viewsheds, indicating that biotic community values would be expected to be enhanced in comparison to current conditions.

Based on the above considerations, the proposed action would not appear to pose conditions adversely impacting the biotic communities present at the site. Those communities that presently have a high degree of natural resource value (hardwood forests and wetlands) would be preserved, and much of the area containing those communities that have been historically compromised by airport activities (now pavements, open field and early successional meadow) would be enhanced.

4.10 Endangered and Threatened Species

Inquiries with the United States Fish and Wildlife Service and with the New York State Natural Heritage Program (see Appendix C for these agency correspondences), resulted in the identification of one federally-listed endangered species, Myotis sodalist (Indiana bat), that

might be expected to seasonally utilize the site. The site areas that would be expected to be used by the Indiana bat, if present, would be the mature deciduous (hardwood) forest, and the riparian and meadow fringes of the forest. The Indiana bat's use of these areas would be in the summer only, at which time the animal would be expected to nest beneath exfoliating bark in dead trees and forage in the surrounding areas.

The proposed action does not include any actions that would directly affect the forest or fringe areas that might be seasonally used by the Indiana bat. Under the redevelopment plan envisioned in the County's Master Plan and encoded in the amended zoning plan for the ADD, those forest areas are anticipated to be utilized as conservation areas or for low–impact recreation. These uses would not be expected to remove or alter significant numbers of trees and thus would not be expected to compromise the habitat in a manner that would adversely affect Indiana bats utilizing the area for summer foraging and breeding. Therefore, the proposed action, in either the short-term or long-term, would not be expected to adversely impact the one identified endangered species (myotis sodalist) that might utilize the site.

4.11 Freshwater Wetlands

New York State- Department of Environmental Conservation freshwater wetlands and federal (National Wetlands Inventory Sysytem)- freshwater wetlands at the site are identified on Figure 7. Inspection of this figure indicates that the entrance roadway and the aircraft maintenance educational facility presently being used by Champlain Valley Educational Services at the Rugar Street entrance to the property, and included as part of the proposed action, appear to be just outside (to the north) of the NYSDEC-regulated wetland MV-17. According to the EDDA for the site, these existing buildings and associated parking areas were constructed during the period from 1989 to 1995.

Since development of the main thoroughfare for the redeveloped property would entail an expansion and extension of the roadway, wetland MV-17, or the buffer area surrounding the wetland, could be potentially impacted. To assess that possibility, C&S Engineers, Inc. conducted a *Wetlands and Waterways Delineation*, for Clinton County in December 2009. Appendix F provides the report generated pursuant to this effort. This study indicated that a 3.44

acre wetland is present within in the 8.96 study area around the Rugar Street entrance. The location of the delineated wetland area appears to be such that the roadway extension/expansion would not impact the wetland, but might infringe upon the 100-foot buffer zone. Should either the wetland or the 100-foot buffer zone be impacted, a permit would be required under Article 24 of the ECL for any construction activities in or adjacent to (within 100 feet of) the state regulated wetlands at the site. A United States Army Corps of Engineers permit would also be required for any such work in the wetlands.

With the exception of the above-discussed potential action, the proposed action, in either the short-term or long-term, does not entail additional construction, fill, or drainage activities within the mapped freshwater wetlands areas, or in 100-foot buffer surrounding the NYSDEC-regulated wetlands. Therefore, the proposed action is not expected to adversely impact freshwater wetlands at the site.

4.12 Floodplains

Figure 8 illustrates the approximate location of the boundary of the floodplain associated with the 100-year flood of the Saranac River, derived from Federal Emergency Management Agency (FEMA) floodplain mapping database. This figure indicates that the 100 year floodplain is very narrow over the majority of the western boundary site, due to the steep river bank, and that the floodplain broadens in the southernmost portion of the site where the river bank slope becomes more gradual.

As indicated on Figure 2, there are no plans for construction of any structures or installation of any facilities that would be inconsistent with accepted practice, with respect to the floodplains, either in the short-term or long-term. Therefore, the proposed action would not be associated with adverse impacts associated with floodplains.

4.13 Coastal Zone Management Program

The proposed action does not include any activities within a designated coastal zone, nor would the project directly affect any coastal resources. Therefore, there would be no impacts adverse impacts to these resources from the project.

4.14 Coastal Barriers

The proposed action does not include any activities within a unit of the Coastal Barriers Resource Systems, nor would the project directly affect any Coastal Barriers Resources System unit. Therefore, there would be no impacts adverse impacts to these resources from the project.

4.15 Wild and Scenic Rivers

No portions of the Saranac River are presently listed as National Wild and Scenic Rivers. Two sections of the river, both within the Adirondack Park, are listed on the Nationwide Rivers Inventory, which lists river segments that have "outstandingly remarkable" values and protects rivers while agencies consider their designation under the Wild and Scenic River System. The NYSDEC provides a list of all New York Rivers that have been designated as "Wild", "Scenic", or "Recreational" by the Department and thus subject to the special provisions and permitting programs designed to maintain the unique features of these rivers. The Saranac River is listed on this site as a "Recreational" river for the approximately 60.4 mile reach of the river from the outlet of Upper Saranac Lake to the point where the river intersects the Adirondack Park Boundary. The former Clinton County Airport is located approximately 15 miles downstream from the Park boundary so is not within the listed portion of the river.

The redevelopment plan specified in the ADD sets aside the entire Saranac River shoreline, as well as a buffer ranging from 250 feet to 1,400 feet for conservation purposes. Since the portion of the Saranac River adjacent to the former Clinton County Airport is not listed in either the National or State Wild and Scenic Rivers programs, and since there are no activities in the proposed action that would apparently require review or permitting under those programs, there does not appear to be an adverse impact in this category associated with the proposed action.

4.16 Farmland

In New York State, individual Counties are given the authority to designate Agricultural Districts, which convey tax advantages and limits to non-agricultural development to lands within these districts that are used for agriculture. These designations are generally based on soil

types or other values that, in the opinion of the legislative bodies, warrant conservation. Consultation with the GIS data base that maps these districts indicates that no such districts are present within the former Clinton County Airport property. Therefore, no adverse impacts to prime or unique farmlands would be expected.

4.17 Energy Supply, Natural Resources, and Sustainable Design

40 CFR 1 502.16(e) and (f) requires consideration of the energy requirements, energy conservation measures, and the use of natural or consumable resources associated with airport development alternatives. In addition, Executive Order 13123 encourages Federal agencies to expand use of renewable energy in its facilities and for its actions.

At present, energy requirements at the former airport are minimal as there are minimal activities conducted at the vacant facility. Likewise, minimal quantities of natural or consumable resources are used at the vacant facility. The No Action alternative would continue this trend. However, since the present use of the facility provides no public benefit, the present condition constitutes an inefficient use of these resources. In contrast, the proposed action would increase use of energy and natural or consumable resources, while also increasing the public benefits associated with the developments. The use of these resources should be increasingly efficient since current construction practices tend to optimize efficient use of resources and energy and current building standards tend to encourage and reward (via associated cost savings and increased desirability) such efficiency. Furthermore, the amended zoning plan encoded by the Town of Plattsburgh for the ADD, provides detailed specifications for efficient street lighting and guidelines that encourage sustainable design.

Since there are no obvious local shortages of any of the resources in question, it may be assumed that the project's benefits would increasingly compensate for the incremental increases in energy and resource consumption, and that adverse impacts to the availability and use of these resources would be avoided.

4.18 Light Emissions and Visual Effects

The light emissions that would be associated with the proposed action would include street lighting, property lighting associated with the residences and commercial/industrial structures, and the transient lighting produced by vehicles using these streets and properties. These emissions would be consistent with those emitted by surrounding properties to the north, east, northwest, and southeast. In the other directions, the properties are generally vacant with no known uses that would appear to be sensitive to the magnitude of light emissions that would be produced. Therefore, it would appear that there would be no significant adverse impacts associated with light emitted from the proposed action.

4.19 Solid Waste Impact

Since there will be limited aeronautical use of the site under any of the project alternatives, guidelines or restrictions regarding the proximity of solid waste disposal facilities to airports would not apply to this project. Therefore, the considerations to this project regarding solid waste impacts would be whether there are any existing conditions at the site that would controvert subtitle D of the Resource Conservation and Recovery Act, or whether any future solid waste practices at the site could be reasonably expected to controvert those regulations.

The 2009 *Environmental Due Diligence Audit* for the property, conducted by C&S Engineers, Inc., included searches via historical mapping, aerial photos, and environmental databases, as well as a site walkover. These efforts resulted in the identification of a historic landfill on the adjoining Clinton County Fairgrounds property, and a historic scrapyard that existed into the 1970's at the northern edge of the property (along NYS Route 3), of which no evidence remains.

The Clinton County Landfill is located approximately four miles west of the site, in the Town of Schuyler Falls. The landfill is operated by New England Waste Services, Inc., a subsidiary of Casella Waste Management, Inc., which took over operation of the landfill from the County in 1996. The County received its Part 360 permit in 1994 for the first lined cell at the facility, and waste disposal commenced in 1997. In recent years, a third lined cell has been permitted, the annual maximum tonnage of the landfill has increased from 125,000 tons to 175,000 tons, and

the landfill began to accept solid waste from outside of Clinton County. In addition to the landfill, New England Waste Services operates 13 solid waste drop-off and recycling centers in the County, holds two annual household hazardous waste collection events, and, in 2008 began operation of a 4.8 megawatt landfill gas-to-energy plant, which produces enough electricity to power more than 5,000 households.

Based on typical rates of solid waste generation from residences and commercial/light industrial businesses, the proposed action might be expected to generate up to 6,000 tons of solid waste and 2,000 tons of recyclable materials per year during the "build out" phase, with the fully developed site possibly generating up to 18,000 tons (solid waste) and 6,000 tons (recyclable materials) annually.

Since the Clinton County landfill has the capacity to handle the solid waste generated by the project, and since there are no known site issues associated with past solid waste disposal activities, the project would not appear to be associated with significant adverse impacts due to solid waste.

4.20 Hazardous Materials

The 2009 *Environmental Due Diligence Audit* for the airport property identified Recognized Environmental Conditions and Suspect Recognized Environmental Conditions associated with the past site activities. These conditions include:

- Subsurface disposal systems and floor drains in structures where aircraft/vehicle storage and maintenance have been conducted;
- Existing and historic underground and above-ground petroleum storage facilities, with known and potential (suspected) soil contamination;
- A historic landfill on the adjoining Clinton County Fairgrounds property;
- Several NYSDEC-documented spills and associated contaminated media;
- Past on-site generation of hazardous waste by numerous entities;

- Documentation and observation of unprotected waste storage, including construction/demolition debris, household refuse, and various containers of liquids; and
- Decommissioned PCB-containing transformers.

Figure 10 illustrates the locations of the Recognized Environmental Conditions and Suspect Recognized Environmental Conditions at the former airport. The 2009 *Environmental Due Diligence Audit* concluded with recommendations for further investigations to ascertain the presence and extent of these conditions. Based on those investigations, remedial actions may be needed, and could be undertaken either before or during the site redevelopment. These activities could be conducted by the County or by the subsequent owner, depending on the terms of sale between the parties; the County could retain responsibility for remediation of those conditions that resulted during the period that the County owned and managed the property, or the new owner could assume that liability. To deal with these potential conditions, a contingency plan, as well as a hazardous materials management plan, would need to be developed and followed. The County, or a subsequent owner, would be able to seek legal redress and financial assistance from other potentially responsible parties to the extent that those parties may be legally liable for the existence of the identified condition.

Hazardous materials that might be generated at the site following redevelopment would be the responsibility of the generator, and would be regulated and documented in accordance with applicable federal, state, or local laws and regulations.

By developing and adhering to appropriate investigations, remedial plans, contingency plans, and materials management plans, there should be no significant adverse impacts associated with hazardous materials during redevelopment of the site.

4.21 Construction Impacts

Potential construction-related impacts of the site redevelopment, along with the measures that would be expected to be included to minimize the adverse effects of those impacts, are listed below:

- Dust and/or VOC generation – An air monitoring plan would be developed and implemented to assess and document whether the construction activities generate excessive quantities of particulates or VOCs. The plan would be based on the New York State Department of Health action levels for these types of emissions and would include measures to mitigate the emissions, such as dousing the ground surface with water to keep dust down or avoiding undue idling of equipment to limit exhaust fumes.

- Erosion/sedimentation – As a condition for receiving a General Permit for storm water discharge for the construction-related activities inherent in a large land redevelopment project of this sort, a Stormwater Pollution Prevention Plan (SWPP), including an Erosion and Sedimentation Control Plan will be instituted and adhered to by the developer. This plan would need to consider the relative locations of ground disturbances and receiving waterways and set forth appropriate mitigation actions, which would likely include silt fences, vegetative buffers, straw bale or stone diversion structures, and mulch.

- Traffic –During the development of the site, the site developer will likely be required by the NYSDOT, Clinton County DOT, and/or Town of Plattsburgh to conduct one or more traffic impact studies or to otherwise determine the likely degree of construction-related traffic impacts that would require mitigation. Such mitigation might include adding traffic control structures or facilities, widening roadways or adding turn lanes or signals, limiting hours of deliveries or materials hauling, using alternative routes, instituting special project scheduling, or providing flagmen for maintenance or protection of traffic.

- Noise - These potential impacts are usually transitive in nature, but if there are any noise sensitive establishments that could be impacted by the construction activities, those impacts could likely be mitigated by limiting the hours that certain noise-producing activities can be conducted, by requiring use of properly muffled equipment for all site work, or by altering haul routes.

4.22 Cumulative Impacts

The proposed action consists of a long-term development plan for the site and has been discussed in the preceding specific impact category discussions. Since the long term plan constitutes the maximum site development envisioned, and limitations to specific types of development have been put in place by the Town of Plattsburgh, the only additional feasible cumulative impacts would seem to be the combined impacts of the site development with other activities or developments conducted by other (off-site) entities. Consultations with local and state and federal agencies (provided in Appendix C), along with the additional research conducted in preparation of this EA, have not identified other such plans. Therefore, it would appear reasonable to conclude that there are no obvious significant adverse cumulative impacts associated with the proposed action.

SECTION 5 PUBLIC PARTICIPATION

A public advertisement of the availability of the draft EA for public inspection and comment was published in the March 13, 2012 edition of the Plattsburgh Press Republican. Consistent with that Legal Notice, the complete draft EA document was available for public review at the Clinton County Government Center, 137 Margaret Street, Suite 208, Plattsburgh, NY 12901 during the period from March 9, 2012 to March 28, 2012 from 9:00 A.M. to 5:00 P.M. The public was invited to submit written comments on the EA for inclusion in the Final EA by April 2, 2012.

A copy of the Order Confirmation, accompanied by the advertisement "proof", for the Legal Notice is provided in Appendix G.

As of April 10, 2012, the designated recipient for written comments from the public had not received any written comments on the draft EA.

SECTION 6 QUALIFICATIONS OF PREPARERS

Resumes of the preparers of this document are provided on the following pages.

THOMAS A. BARBA
DEPARTMENT MANAGER, ENVIRONMENTAL SERVICES

- Served as technical manager for the preparation of environmental assessments for numerous airport development projects. Key issues have included relocation of residences, impacts to a federal Superfund site, impacts to a DOT 4(f) lands (e.g., public golf course), closure and relocation of public roads, impacts to sensitive ecologies, impacts to threatened and endangered species, impacts to wetlands, and air and noise modeling. Among the airport projects were the creation of new public airports from closed Air Force bases.

- Prepared environmental impact statements, environmental assessments and, environmental reviews for several major projects including a large high-tech research & development facility, a semiconductor manufacturing facility, a truck stop / travel plaza, and airport development projects. Issues included environmental media (i.e., air, water, waste, wetlands, hazardous waste), non-technical items (e.g., traffic, noise, socioeconomic), and NEPA compliance.

- Provided technical assistance and quality reviews on numerous short form environmental assessments and environmental due diligence assessments (EDDAs) for airport projects. This included both technical items and NEPA compliance issues.

- Managed site investigations and remediation projects at several brownfield, spill, and inactive hazardous waste sites. Supervised and conducted work plan development, hydrogeologic programs, sampling and analysis, health and safety, data evaluation, risk assessment, report preparation, remedial design, and construction for active and inactive disposal sites; ash landfills, PCB sites, drum disposal sites, and solvent/petroleum spill sites.

- Conducted air quality projects for facilities including emission point and source surveys, emission estimates and inventories, and permitting programs. Permitting included minor and major (Title V) facilities.

- Directed various aspects of bulk petroleum and chemical tank management projects including removal, design, and installation of new facilities, testing, soil remediation, and SPCCs.

- Provided environmental consulting services to several colleges and universities. Aspects included air quality services, oil storage, chemical bulk storage, wastewater, hazardous chemical management, and environmental impact review.

- Conducted environmental audits and environmental site assessments for several industrial and commercial facilities. Aspects included air, wastewater, water supply, solid waste, hazardous waste, chemical and

Mr. Barba has extensive experience in environmental control and management, including work at airports, in industry, and in the consulting field. He has been responsible for projects involving environmental assessments and environmental impact studies, air emissions, wastewater, hazardous waste, site contamination, site investigations, environmental audits, health and safety programs, sampling and analysis programs, and permitting.

EDUCATION

B.S. (Biochemistry) SUNY College of Environmental Science and Forestry

B.S. (Chemistry) Syracuse University

SPECIALIZED TRAINING

Additional coursework in MBA program, Syracuse University

OSHA 40-Hour HAZWOPER

Risk Analysis in Environmental Health – Harvard University School of Public Health

Groundwater Pollution and Hydrology – Princeton University

Airport Wildlife Hazard training

PROFESSIONAL ORGANIZATIONS

Air and Waste Management Association

American Chemical Society

petroleum storage, chemicals handling, SARA, and wetlands.

RORY WOODMANSEE
SENIOR ENGINEER

Environmental Design, Evaluation, and Compliance Documentation: Provides design, environmental evaluation, and regulatory compliance services and documents including work plans, sampling plans, quality assurance plans, site management plans, spill control plans, environmental assessments, contractor bid documents for environmental projects including:

- Environmental assessments and Environmental impact studies under NEPA and SEQRA several projects including upgrades to Syracuse Hancock International Airport, replacement of a major railroad bridge in a historic and scenic State park, and installation of fiber optic networks along interstate highway rights-of-way.
- Completion of spill prevention, control and countermeasure (SPCC) plans, as well as environmental response plans and hazardous waste contingency plans for industrial and institutional clients including Wabash Aluminum Alloys and Onondaga County (Lake Improvement Project Office and Department of Transportation).
- Design for excavation and off-site disposal of PCB-impacted soils at the Oswego Fire Training School, a CERCLA site and facility operated by Niagara Mohawk Power Corporation.
- Design of systems for remediation of petroleum-impacted soil and groundwater, including soil vapor extraction, air stripping, and air sparging systems, for New York State Police sites administered by the New York State Office of General Services.
- Preparation of a feasibility study for remediating PCB contamination of soil, sediments, and groundwater at a CERCLA site in Cobleskill, New York.

Field Sampling, Construction Oversight and Project Implementation: Provides field engineering and technical support for environmental projects of varying magnitude, including:

- Field service manager for New York State Office of General Services-lead removals of underground petroleum storage tanks, including determination of extent of contaminated materials and collection of remediation verification samples.
- Contractor oversight and verification sampling for PCB-impacted soils at sites where volumes of impacted materials ranged from several hundred cubic yards to over 10,000 cubic yards.
- Installation of permanent and temporary water treatment facilities for environmental projects, including installation of buildings, pumping systems, chemical precipitation/flocculation addition,

Mr. Woodmansee is involved with environmental investigation, design, remediation, and compliance activities for clients within the private, institutional, and government sectors. He develops subsurface investigations and conducts sampling of soil, sediments, surface water and groundwater associated with releases of petroleum and chemicals to the environment. He is also involved with designing and implementing remediation systems, as well as assisting corporate, institutional, and governmental clients in complying with regulatory requirements.

EDUCATION

B.S., 1994, Environmental Resource and Forest Engineering, State University of New York College of Environmental Science and Forestry

A.S., 1992, Engineering Cayuga County Community College

REGISTRATION

E.I.T., New York State

40-hour Hazardous Waste Operator Certified

contact clarification tanks, groundwater monitoring wells, and separate phase liquid extraction systems.

WAYNE N. RANDALL

GEOLOGIST

EXPERIENCE

Mr. Randall is a member of the Remediation and Compliance Group at C&S. Some of his responsibilities include:

- Performing environmental assessments for municipal, commercial, airport, industrial, and private clients. Assessment responsibilities include, but are not limited to; on site inspection, historical use investigations, regulatory review, and report preparation.
- Oversight of subsurface investigations to assess hydrogeology and extent/migration of groundwater and soil contamination at sites. Investigative responsibilities include sampling and field analysis of water, soil and air.
- Performing landfill inspections and combustible gas monitoring in accordance with the NYSDEC.

Some of the projects Mr. Randall has been involved with at C&S include:

Oneida Indian Nation

- Phase I Environmental Site Assessment on a collection of Oneida Indian Nation properties, which was performed consistent with the American Society for Testing and Materials (ASTM) E1527–00, *Standard Practice for Environmental Site Assessments – Phase I Environmental Site Assessment Process*.

Pioneer Midler Avenue, LLC

- Brownfield Remedial Investigation conducted at the former Midler City Industrial Park site, located in the City of Syracuse, Onondaga County, New York.

Knoxboro, New York and Clay, New York Landfills

- Landfill inspection including gas vent pipe monitoring, inspections of the groundwater well network, landfill cap system, vegetative cover, drainage swales, perimeter fence and gate, and surface water retention ponds.

Mr. Randall also has over four years experience working in the groundwater consulting industry. His knowledge and expertise include the following:

- Assess the geologic and hydrologic characteristics of an area and design a plan for groundwater development.

Mr. Randall's responsibilities, as a Geologist, include a wide variety of projects dealing with environmental monitoring, regulatory compliance, data interpretation, and environmental assessment.

EDUCATION

B.A., Geology, State University of New York at Potsdam

SPECIALIZED TRAINING

40-hour Safety Training for Hazardous Waste Operations as Required by OSHA 29CFR 1910.120

10-hour Occupational Safety and Health Training Course

Introduction to Permit Required Confined Spaces

PROFESSIONAL ORGANIZATIONS

Geological Society of America

- Conduct geophysical surveys and analysis of geophysical data
- Geophysical Techniques used: Seismic Refraction, VLF (very low frequency), Elecromagnetic, GPR (ground penetrating radar), Electrical Resistivity, Microgravity, and CSAMT (controlled source audio magne-telluric)
- Fracture Trace Analysis of aerial photography and digital elevation models.
- Oversee well drilling, filter pack design, and well development.
- Supervise well construction and sampling, perform aquifer tests, and water quality sampling for sand and gravel and bedrock wells.
- Sieve analysis of aquifer materials for well screen design.
- Conduct GIS work creating maps and diagrams using Arcveiw 3.x, Spatial Analyst, and Global Mapper to help define geological characteristics of an area.

Some of the projects representative of his past experience include:

Water and Sewage Authority of Trinidad and Tobago (WASA), Trinidad and Tobago, West Indies

- Conducted extensive geophysical surveys to map deep alluvial aquifers through hundreds of feet of clay as well as deep fractured bedrock zones.
- Organized and implemented field crews of up to five people.
- Efforts lead to the discovery of 16 million gallons of new potable groundwater for the island.

Montserrat Water Authority, Montseratt, West Indies

- Conducted CSAMT (controlled source audio magne-tellurics) and Microgravity surveys to locate a groundwater well that yields 1 million gallons of potable water a day.

Village of Malone, NY

Conducted Electrical Resistivity and Microgravity surveys to locate two wells capable of yielding over 4 million gallons of new potable groundwater to replace surface water intakes the village was using and had to replace per NYS law.

SECTION 7 APPROVALS

After careful consideration of the facts contained herein, it is concluded that the contents of this environmental document are valid and that all pertinent conditions and requirements have been or will be met in the current action.

Prepared By:

_____ _____

C&S ENGINEERS, INC. Date

Rory Woodmansee

Senior Engineer

Recommended By:

_____ _____

Clinton County Legislature Date

Rodney L. Brown

Deputy County Administrator

Approved By:

_____ _____

Federal Aviation Administration Date

Marie Jenet

Environmental Specialist