

Draft Scoping Document for

Gan Eden Estates

Draft Environmental Impact Statement (DEIS)

Town of Thompson
Sullivan County, New York

June 2020

SEQR Lead Agency:
Town of Thompson Planning Board
4052 Route 42
Monticello, New York 12701

Applicant:
Gan Eden Estates
90 Woodbridge Center Drive, Suite 600
Woodbridge, New Jersey 07095

Project Contact:

Project Scoping Session to be Conducted:
Town of Thompson Town Hall
4052 Route 42
Monticello, New York 12701
DATE

Date Comments Due:

Direct written comments to planning@townofthompson.com or to
Heather Zangla, Building Department
Town of Thompson Town Hall
4052 Route 42
Monticello, New York 12701

INTRODUCTION

This Draft Scoping Document has been prepared for the Town of Thompson Planning Board (the “Planning Board”) as Lead Agency for the State Environmental Quality Review (“SEQR”) of the proposed Gan Eden Estates residential development project.

The purpose of this Draft Scoping Document is to initially define the environmental issues that will be addressed by the project sponsor during preparation of a Draft Environmental Impact Statement (“DEIS”) for the Proposed Action.

The Planning Board will hold a Public Scoping Session pursuant to 6 CRRNY 617.8 at the Thompson Town Hall, 4052 Route 42, Monticello, New York on [REDACTED], 2020 at [REDACTED]:00 p.m. Additional written comments from members of the public and Involved and Interested Agencies will be accepted until [REDACTED], 2020 at [REDACTED] p.m.

Based on the comments received, the Planning Board will prepare and adopt a Final Scoping Document. The Final Scoping Document will serve as a foundation for the identification of known potentially significant adverse environmental impacts pertinent to the Proposed Action and to document appropriate mitigation measures. The Final Scoping Document will also eliminate consideration of impacts that are either irrelevant or non-significant.

The Planning Board adopted a Resolution on April 22, 2020 assuming Lead Agency status for conducting review under the State Environmental Quality Review Act (“SEQRA”). The Planning Board has classified the proposed project as a Type 1 Action under SEQRA and issued a Positive Declaration of environmental significance. The Planning Board found potential significant adverse impacts may include impacts relating to disturbance of land and surface water, groundwater withdrawals, deteriorated condition of an on-site dam, movement of goods and people to and from the site on a lightly traveled rural road network, and a use in contrast to surrounding land uses and requiring community-scale utilities as well as demands on local community services including emergency services and the educational system.

PROJECT DESCRIPTION

The project sponsor, Gan Eden Estates (“Gan Eden”), proposes to construct a residential development in the Town of Thompson, New York (the “Proposed Action”). The Proposed Action is located on a 198.92-acre parcel in Thompson. There is a second, contiguous lot located in the Town of Fallsburg, 13.37 acres in size. The total project site is 212.29 acres (the “Project Site”). All residential development will be on the Thompson lot; groundwater wells will be located on the Fallsburg lot.

Gan Eden proposes to construct 534 rowhouse-type units, including 267 two-bedroom units and 267 three-bedroom units. Gan Eden will lease those units to tenants. The units will be located in eighty-nine (89) separate buildings, each consisting of six (6) units. The Proposed Action will include over two (2) miles of interior roads, a clubhouse, a pool, a tennis court, playgrounds, recreational walking trails, a water system storage tank, a wastewater treatment plant, and utility infrastructure. The Proposed Action will provide sufficient off-street parking as well

as additional on-street parking. Access to the Project Site will be from three driveways, two located on Route 104 (Main Street), and one located on Route 107 (Old Liberty Road).

The Proposed Action will be constructed in five (5) phases, designated as Phase 1, Phase 1A, Phase 2, Phase 3, and Phase 4 as follows: Phase 1 will include twenty-four (24) residential buildings consisting of 144 units, the clubhouse, pool, a tennis court, playground, wastewater treatment plan, water storage tank, and related interior roads and utility infrastructure. Phase 1A will include ten (10) residential buildings consisting of sixty (60) units. Phase 2 will include thirty (30) residential buildings consisting of 180 units and related interior roads. Phase 3 will include eleven (11) residential buildings consisting of sixty-six (66) units and related interior roads. Phase 4 will include fourteen (14) residential buildings consisting of eighty-four (84) units and interior roads. It is expected the Proposed Action will be fully constructed by 2027.

In total, 85.9 acres will be permanently disturbed by the Proposed Action.

PROJECT LOCATION

The Project Site consists of property identified as Tax Lot Section 2, Block 1, Lot 6.3 in the Town of Thompson, Sullivan County, and Tax Lot Section 32, Block 1, Lot 59 in the Town of Fallsburg, Sullivan County. The Project Site is situated at the northwest corner of the intersection of Route 104 (Main Street) and Route 107 (Old Liberty Road).

Insert project location map

GENERAL GUIDELINES FOR THE DEIS

The provisions of 6 NYCRR 617.9 will apply to the contents of the DEIS. The DEIS will address all items in this Draft Scoping Document and assemble as much relevant information and material facts as are available. The DEIS will evaluate reasonable alternatives.

The DEIS will conform to the format outlined in this Draft Scoping Document. It shall employ concise, plain language. It shall be written in the third person and avoid use of terms such as “we” or “our.” The DEIS will present facts and conclusions supported by the record of review. Speculation and opinion shall not be presented in any aspect of this environmental review.

Narrative discussions shall be accompanied by, to the greatest extent possible, appropriate charts, graphs, maps, and diagrams. If a particular subject matter can be most effectively described in graphic format, the narrative discussion should summarize and highlight the information presented graphically.

Environmental impacts will be described in terms that a layperson can readily understand.

All discussions of mitigation measures will consider at least those measures mentioned in this Draft Scoping Document. Mitigation measures will be incorporated into the Proposed Action as required to secure local, state, and federal permits to allow implementation of the project.

FORMAT AND CONTENTS OF DEIS

COVER SHEET

The Cover Sheet of the DEIS shall contain all information required by 6 NYCRR 617.9(b)(3):

- Statement that it is a DEIS;
- Name and descriptive title of the action;
- Location of the Proposed Action, including town, county, tax lot identification, and address (if applicable);
- Name and address of the Lead Agency, and contact information for the person at the Lead Agency who can provide additional information, including contact's name, address, e-mail, address, and telephone number;
- Names of all individuals and organizations that prepared the DEIS;
- Date of its acceptance by the Lead Agency;
- Date by which comments shall be submitted, including name, address, and e-mail address, and date and time by which comments shall be received.

TABLE OF CONTENTS

The DEIS shall contain a Table of Contents in conformance with 6 NYCRR 617.9(b)(4), including the Cover Sheet and a precise summary that adequately summarizes the contents of the DEIS, including all figures, tables, maps, and appendices.

APPENDIX

Highly technical materials will be summarized in the DEIS and included in their entirety in an appendix.

I. EXECUTIVE SUMMARY

The Executive Summary will provide an overview of the detailed information included in the DEIS. All information contained in the Executive Summary will also be included in the DEIS. The Executive Summary will include the following information.

- Introduction of the purpose of the DEIS, summary of the relevant history of the SEQRA process that has occurred to date, and the Type of Action (*i.e.*, Type I).
- Description of the existing conditions of the Project Site, including:
 - Site location, including tax map references and County Roads;
 - Existing land use;
 - Existing site conditions (*e.g.*, size of site, topography, wetlands size and locations, watercourses, vegetative cover);
 - Existing site access;
 - Existing zoning;

- Existing land uses of surrounding properties; and
 - Brief history of the use of the Project Site.
- Description of the Proposed Action, including:
 - Overview of the project layout;
 - Size, location, and use of proposed structures;
 - Parking;
 - Circulation;
 - Landscaping;
 - Stormwater;
 - Recreational facilities; and
 - Proposed utilities.
- List identified local, County, Regional, State, and Federal approvals known.
- List identified Involved Agencies and Interested Agencies, as those terms are defined by 6 CRRNY 617.2(t) and (u).
- Describe purpose of the Proposed Action and public benefits.
- Summary of potential impacts, and proposed mitigation measures, listed in the order addressed in the DEIS.
- Summary of any unavoidable environmental impacts.
- Summary of alternatives analyzed.
- Summary of irreversible and irretrievable commitment of resources.
- Summary of project impacts on energy and solid waste management.
- Summary of growth-inducing impacts.
- Summary of impacts on climate change.

II. DESCRIPTION OF THE PROPOSED ACTION

A. Project Site – This section will provide a narrative description of the Project Site with accompanying graphical representation. It will include the following:

- Project Site location, including tax map references and abutting roads.
- Existing acreage.
- Existing site conditions including:
 - Topography;
 - Location and size of wetlands, watercourses, and surface water bodies;
 - Soil types; and
 - Vegetative cover.
- Zoning designations.
- Site access.
- Surrounding land uses.
- Existing easements or rights-of-way that may affect the Proposed Action.
- Historic uses of the Project Site.

B. Proposed Action – This section will provide an overview of the Proposed Action, including:

- General project layout.

- Area of disturbances.
- Description of proposed buildings and structures.
- Site access.
- Open space and recreational areas.
- Internal circulation.
- Parking.
- Project demographics.
- Proposed drainage and utilities.
- Ownership and maintenance of infrastructure.
- Construction phases.

C. Project Public Need and Benefit – This section will include a narrative description of the public need for the Proposed Action. It shall identify the objectives of the Applicant and the public benefits of the Proposed Action.

D. List of required permits and approvals – This section will identify the Involved Agencies and identified necessary permits and approvals. This section will also identify the Interested Agencies.

III. Existing Conditions, Potential Impacts, and Proposed Mitigation

A. Soil and Topography

1. Existing Conditions

- Identify soil types and characteristics as presented in the Sullivan County Soil Survey.
- Describe site topography.
- Identify depth of water table and locations of areas in which bedrock are either exposed or within five (5) feet of the surface.
- Identify locations with steep slopes (15% of greater).
- Topographical maps at two-foot contours shall be provided.

2. Potential Impacts

- Identify total amount and location of soil disturbance and total impervious surfaces included in the Proposed Action.
- Describe limitations that geology, soils, or topography may place on development of Project Site.
- Explain potential for erosion and drainage complications.
- Present grading plan including discussion on the ability to balance the Project Site.
- Discuss location and need for retaining walls.
- Identify development on steeply sloped areas and ability to avoid or minimize those areas.

3. Mitigation

- Mitigation will be proposed for any identified adverse environmental impacts as necessary including but not limited to redesign of the Proposed Action to reduce or eliminate significant impacts.

- Include Stormwater Pollution Prevention Plan (SWPPP) with soil testing to confirm the appropriateness of mitigations proposed.

B. Surface Water and Stormwater

1. Existing Conditions

- Identify location and size of all surface water features, including wetlands, ponds, streams, and any other natural or man-made water body, and inter-connectivity of same.
- Identify classification and jurisdiction of all classified surface water features.
- Identify watershed in which the Project Site is located.
- Describe pre-development drainage patterns.
- Identify location and condition of the dam located on the Project Site. A Dam Condition report will be provided.
- Maps of surface water features and wetlands will be provided, as well as copies of all jurisdictional determinations and boundary confirmations from regulatory agencies with jurisdiction currently in effect.

2. Potential Impacts

- Identify any encroachments into surface water resources, wetlands, or regulated areas. Describe nature of all encroachments and whether encroachments will be temporary or permanent.
- Explain the purpose of each such encroachment and any potential for contamination of surface water resources and wetlands, both on a short-term (construction) and long-term basis.
- Describe post-construction drainage patterns.
- Identify any new surface water features that may be created by the Proposed Project, or the enlargement to any existing surface water feature, including wetlands.
- Describe impacts, if any, the Proposed Action may have on the existing impoundment and dam on the site.
- Correspondence with the New York State Department of Environmental Conservation (“NYSDEC”) will be provided.

3. Mitigation

- Mitigation will be proposed for any identified adverse environmental impacts as necessary including but not limited to redesign of the Proposed Action to reduce or eliminate significant impacts.
- Discuss proposed short-term (construction) and long-term protection measures for surface waters and wetlands through an erosion and sediment control plan prepared consistent with the most up-to-date NYSDEC stormwater design manual.
- Describe any improvements required to bring the dam fully into compliance with current standards and regulations.

C. Ground Water

1. Existing Conditions

- Identify all existing wells on the Project Site, their pumping and rated capacity. Documentation of pump test protocol and all water quality data will be provided, including but not limited to Part V analysis and analysis for Emerging Contaminants (PFAS and 1,4-Dioxane) consistent with the New York State Department of Health (“NYSDOH”) protocols.
- Describe aquifer and hydrogeological conditions beneath the site.

2. Potential Impacts

- Determine estimated daily demand for water based on the size of the Proposed Action, including potable water and water for fire flow based on recognized methodologies.
- Identify locations of any new wells or expansion of any existing wells.
- Confirm onsite wells can meet maximum daily demand consistent with NYSDOH standards.
- Recognize the requirements for a taking permit under the Delaware River Basin Commission (“DRBC”) and NYSDEC regulations.
- Describe all proposed infrastructure required for water distribution system, including water treatment plant, water storage tank, pumps, and water mains. Provide concept plan identifying all water supply, treatment, storage and delivery infrastructure. Provide manufacturer specifications for water storage tank.
- Identify any permits required for water system.
- Explain ownership and administrative issues relating to onsite water system, including maintenance of system.
- Discuss control of water pressure for residential use.
- Discuss fire flow pressure requirements.
- Analyze any potential impacts or draw downs to surrounding wells based on pumping tests. Pumping test result to be provided.

3. Mitigation

- Discuss mitigation measures for identified adverse environmental impacts as may be necessary including but not limited to redesign of the Proposed Action to reduce or eliminate significant impacts.
- Discuss mitigation measures for impacts on other wells adjacent to the Project Site as may be necessary.

D. Waste Water Management

1. Existing Conditions

- Identify any existing wastewater infrastructure on the Project Site or serving the Project Site.

2. Potential Impacts

- Describe hydraulic and organic characteristics of sanitary sewage for the Proposed Action based on approved methodologies, including all wastewater to be collected and treatment including but not limited to that which originates from residential buildings, the clubhouse, and the pool.
- Describe the proposed system to collect and convey wastewater, including locations of wastewater sewers and pumping stations. Provide a concept plan for the proposed collection, treatment, and discharge system.
- Describe the onsite wastewater treatment facility. Provide technical details for proposed wastewater treatment facility.
- Identify location of effluent discharge and impacted wetlands and water bodies.
- Identify and characterize all permits necessary to construct and operate wastewater treatment facility, including but not limited to those issued by NYSDEC and DRBC
- Explain ownership and administrative issues relating to wastewater conveyance and treatment systems, including maintenance of system and plant.

3. Mitigation

- Discuss mitigation measures that will be proposed for identified adverse environmental impacts as may be necessary, including, but not, limited to redesign of the Proposed Action to reduce or eliminate significant impacts.

E. Vegetation and Wildlife

1. Existing Conditions

- Describe onsite vegetative communities.
- Provide an inventory of mammals, birds, reptiles, and amphibians that are or may be present on the Project Site, including migratory and breeding birds.
- Identify potentially federal or NYSDEC rare, threatened, and/or endangered species that are or may be on the Project Site.
- Methodologies for determining onsite vegetation and wildlife and correspondence with the NYSDEC will be provided.

2. Potential Impacts

- Calculate changes in land coverage types at the Project Site, and determine significance of change on ecological communities.
- Evaluate the Proposed Action's potential impacts to flora and fauna, including:
 - Reductions of populations or loss of individuals of any threatened or endangered species as listed by federal or state agencies;
 - Reductions or degradations of habitat of rare, threatened, or endangered species;
 - Reductions of populations or loss of individuals of any species of special concern or conservation need listed by federal or state agencies;
 - Reductions or degradations of habitat of species of special concern or conservation;
 - Removal of a designated significant natural community, or ground disturbance in any portion thereof;

- Substantial interferences with nesting/breeding, foraging, or over-wintering habitats for the predominant species that occupy or use the Project Site;
- Conversion of more than ten acres of forest; and
- To the extent that herbicides or pesticides are proposed for use during any phase of construction or operations of the Proposed Action, an Integrated Vegetation Management and/or Integrated Pest Management Plan shall be prepared to fully describe all proposed management practices including but not limited to mechanical and chemical site management with details including to meet the standards of the USEPA IVM and IPM guidance as well as NYSDEC guidance.

3. Mitigation

- Discuss mitigation measures will be proposed for identified adverse environmental impacts as may be necessary including but not limited to redesign of the Proposed Action to reduce or eliminate significant impacts.

F. Traffic

1. Existing Conditions

- Describe existing road network in vicinity of site, including number of travel lanes, pavement/shoulder widths, speed limits, intersection geometry, and traffic control.
- Describe results of traffic counts during weekday peak times (7:00 to 9:00 a.m.; 4:00 to 6:00 p.m.) at the following intersections:
 - NY Route 52/Loch Sheldrake Road (CR 104)
 - Lock Sheldrake Road/Main Street (CR 104)/Mongaup Road
 - Loch Sheldrake Road (CR 104)/Old Liberty Turnpike (CR 107)/Anawana Lake Road (CR 103) (Thompson, NY)
 - Anawana Lake Road (CR 103)/Whittaker Road
 - Anawana Lake Road (CR 103)/Kutsher Road
 - Anawana Lake Road (CR 103)/Fraser Road
 - NY Route 42/Anawana Lake Road (CR 103)
 - Liberty Street/Broadway (NY Route 42)/Prince Street
- Traffic data shall be adjusted to reflect a baseline analysis condition that represents local seasonal peaking characteristics.
- The characteristics of weekday and weekend traffic volumes and directional distribution patterns on the study roadways will be documented from existing available traffic data published by the New York State Department of Transportation (“NYSDOT”).

2. Future No-Build Traffic Conditions

- Calculate and apply annual growth factor to existing traffic volumes to project volume to 2027—the year the Proposed Action is expected to be completed.
- Include traffic from other development projects, including proposed, approved, and projects under construction.

3. Potential Impacts of Proposed Action

- Estimate the amount of traffic to be generated by the Proposed Action when fully built-out and, if significant adverse impacts are found, estimates of the amount of traffic to be generated for interim development phases. The trip generation should be based on the Institute of Traffic Engineers (ITE) *Trip Generation* (10th Edition) Land Use Code (LUC) 220 (low-rise multi-family housing). The trip generation estimate shall identify the traffic generated during the weekday AM and PM peak hours.
- Describe the number of vehicles entering and exiting the site from each entrance for weekday AM and PM peak hours.
- Identify the estimated trip distribution of site traffic origins and destinations within the study area and identify the assignment of trips to specific roadway travel paths.
- Calculate intersection Level of Service (LOS) using the procedures of the *Highway Capacity Manual*, 6th Edition. The software used for this analysis shall comply with NYSDOT's Approved List of Traffic Analysis Software (see EB 17-026). The capacity analysis will be conducted for Existing, Future No-Build, and Future Build volume conditions. The analysis will report the average vehicle delay and LOS grade. Summary reports will be provided as an appendix to the study to identify the data inputs and additional standard performance metrics such as volume-to-capacity (v/c) ratios and vehicle queue lengths.
- Conduct a sensitivity analysis to assess the reserve capacity available at the primary site access intersection with CR 104 and at the junction of CR103-104-107. Use this data and the available count data from NYSDOT to provide a qualitative assessment of summer weekday versus summer weekend traffic operations in the Future Build condition.
- Describe internal circulation, including adequacy of access, parking, and road widths.
- Conduct a sight-distance analysis for all three (3) site access intersections with the surrounding roadway network. The analysis will consider the applicable Intersection Sight Distances (ISD) and Stopping Sight Distance (SSD) criteria.
- Provide crash summary evaluation.

4. Proposed Mitigation

- Recommend traffic and safety improvements as may be required based on the analysis, and address timeline for implementation of any proposed measures.
- Discuss additional mitigation measures that may be necessary including but not limited to offsite improvement or redesign of the Proposed Action to reduce or eliminate significant impacts.

G. Land Use, Zoning, and Community Character

1. Existing Conditions

- Existing land use and zoning for Project Site and properties located adjacent to the Project Site within **TBD** mile radius will be described narratively and graphically.
- Identify any reference to site in Town of Thompson's Comprehensive Plan.
- Explain current and projected housing needs for the Town of Thompson and Sullivan County.

2. Potential Impacts

- Discussion of proposed site plan, including analysis of zoning requirements and need for any variances or waivers.
- Analyze and describe vision statement, goals, and objectives of the Comprehensive Plan as they may relate to the Proposed Action.
- Discuss impacts to surrounding neighborhood character, including but not limited to impacts on light, air, open space, landscaping, architecture, and visual character.

3. Mitigation

- Propose mitigation for identified adverse environmental impacts as necessary, including site design considerations and landscaping plans as well as redesign of the Proposed Action to reduce or eliminate significant impacts.

H. Community Services

1. Existing Conditions

- Identify police, fire, and schools, including school transportation, serving project site.
- Describe the existing capacity of each service in terms of facilities, staffing, equipment, and other appropriate metrics.
- Identify local, county, and state recreation facilities in within a **TBD** mile radius of the Project Site.

2. Potential Impacts

- Projected demand for services will be identified in terms appropriate to each service such as:
 - Population relative to police officer;
 - Number of structures, materials of construction, presence of fire suppression systems, etc.; and
 - Number of students and student distribution anticipated to be generated by the development.
- Projected emergency response times will be discussed.
- The project plans will be reviewed with local emergency service providers and their comments considered.
- Fire hydrants, storage, and pressure needs for firefighting will be discussed.
- Snow removal needs will be explained, including any requirement for municipal service.
- Need for additional recreational facilities resulting from the Proposed Action will be addressed.
- A phase-based cost of services analysis shall be conducted and provided to determine the balance, shortfall or surplus in tax revenues projected to be generated by the development relative to the projected demands for services.

3. Mitigation

- Based on the cost of services analysis, mitigation measures beyond tax revenue generation shall be outlined to mitigate any shortfalls.

- Propose mitigation for identified adverse environmental impacts as necessary including but not limited to redesign of the Proposed Action to reduce or eliminate significant impacts.

I. Cultural Resources

1. Existing Conditions

- Identify prehistoric and historic archaeological and architectural resources located on the Project Site and, if any, assess their eligibility for inclusion in national or state register of historic places.
- Identify prehistoric and historic archaeological and architectural resources located within a one-mile radius of the Project Site.
- Applicant will provide a Phase 1-A Cultural Resource Reconnaissance Report and a Phase 1-B Archaeological Survey.

2. Potential Impacts

- Identify impacts, if any, to prehistoric and historic archaeological and architectural resources on the Project Site and within a one-mile radius of the Project Site.

3. Mitigation

- Propose mitigation for identified adverse environmental impacts as necessary including but not limited to redesign of the Proposed Action to reduce or eliminate significant impacts.

IV. Unavoidable Adverse Environmental Impacts

This section will identify and summarize those adverse environmental impacts that can be expected to occur with or without mitigation measures, and the probability of those impacts. This section will include a summary of the Proposed Action's impacts in terms of the loss of environmental resources, and should address the anticipated topographical impacts in terms of acres disturbed.

V. Alternatives

This section will discuss alternatives for development of the Project Site in a manner consistent with the current zoning, including a modified, scaled-back or redesigned residential development project. Each alternative shall be described, and its impacts discussed, in a level of detail necessary for full evaluation. Alternatives to be evaluated include but are not limited to:

1. No Action - abandoning the Proposed Action and leaving the Project Site in its present state without further action.
2. Reconfiguration to reduce or avoid environmental impacts - This alternative should include different levels of housing development permitted under the present zoning, different housing sizes and types, reducing or eliminating project components, such

as recreation clubhouse facilities, and clustering housing of various types in present locations and different locations.

3. Reconfiguration to reduce impervious surfaces - In addition to various redesigns and clustering of housing units of various types to be studied to reduce environmental impacts generally, specifically address the overall effect of eliminating or reducing paved parking areas and the effects of such reductions, if made.
4. Reconfiguration to increase traffic safety at entrances and exits to the Proposed Action - alternatives should address the overall impacts on safety of increasing or decreasing the number of access driveways, changing their location(s), and the use and implementation of recognized traffic control devices, including their impacts on existing roadway traffic, adjacent properties, visual impacts and other relevant factors.

VI. Irreversible and Irrecoverable Commitment of Resources

This section will summarize the Proposed Action and its impacts in terms of the loss of environmental resources, both in the immediate future and in the long term.

VII. Project Impacts on Energy Use and Solid Waste Management

This section will summarize the Proposed Action and its environmental impacts on the use of energy and the management of solid waste produced by the Proposed Action. It will identify the energy sources to be used, anticipated levels of consumption, and ways of reducing energy consumption.

VIII. Growth Inducing Impacts

This section will discuss whether there is a growth inducing impact as a consequence of the approval and construction of the Proposed Action.

IX. Impacts on Climate Change

This section will discuss any impacts of the Proposed Action on climate change, such as flooding, and measures to avoid or reduce those impacts. This section will also address Green features of the project that advance environmental protection goals and policies.