BBIS AUTO AUCTION
KAUFMAN ROAD

EXPANDED PART 3
ENVIRONMENTAL ASSESSMENT FORM (EAF)

Kaufman Road
Town of Thompson, Sullivan County
New York

Town of Thompson Tax Lot:
Section 12 Block 1 Lot 54.1 & 55

Lead Agency:
TOWN OF THOMPSON PLANNING BOARD
4052 Route 42
Monticello, NY 12701
Attention: Planning Board Chairman, Lou Kiefer
(845) 794-2500

Prepared By:
Engineering & Surveying Properties, P.C.
71 Clinton Street, Montgomery, NY 12549
Contact: Ross Winglovitz, P.E.
(845) 457-7727
www.EngineeringPropertiesPC.com

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Achieving Successful Results with Innovative Designs

Submitted: September 18, 2020

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1.0 INTRODUCTION

Series 11, A Sperate Series of BBIS Investment 767, LLC (the "Applicant") submitted Site Plan & Special Exception Use Applications, a Site Plan, and a Full Environmental Assessment Form (FEAF) for the Proposed Action to the Town of Thompson Planning Board ("Planning Board") in September 2019. The Planning Board subsequently declared its intent to be Lead Agency for the SEQRA (State Environmental Quality Review Act) for review of the Project and a Notice of Intent for Designation of Lead Agency dated January 21, 2020 was circulated to all Involved and Interested Agencies. No objections from any Involved or Interested Agencies were received in response to the Notice of Intent. The FEAF, Lead Agency Notice of Intent, and Expanded Part 3 FEAF outline are attached as Appendix A.

This Expanded Part 3 Environmental Assessment Form provides a description of the Proposed Action and examines the potential environmental impacts that may result. The Project is a commercial development in the Town of Thompson on Kaufman Road and NYS Route 17B. The Proposed Action includes the construction of vehicle drop-off and pick-up areas, construction of a vehicle storage for approximately 11,000 vehicles, and construction of an 8,275 square-foot business office and inside vehicle inventory area. In the Part 3 EAF, potential impacts are identified, and mitigation measures are proposed as needed. This document, including the Appendices and documents referenced herein, is intended to provide the Planning Board, as lead agency, with enough information to assist in evaluating the potential impacts of the Proposed Action.

1.1 Site Location

The proposed BBIS Auto Auction (the "Proposed Action", "Project Site", "Project", or "Site") is located on the northwest side of the intersection of NYS Route 17B and Kaufman Road in the Town of Thompson, Sullivan County, New York. The Site is bounded by NYS

Route 17B on the south, Kaufman road on the east, vacant woodlands and a power transmission line to the north, and vacant woodland and a mobile home park on the west. The subject parcel is identified on Town of Thompson Tax Maps as Section 12 Block 1 Lots 54.1 & 55. The entire property is located within the Town of Thompson Commercial Industrial Zoning District (CI). The Project Site location is shown on Figure 1.1A.

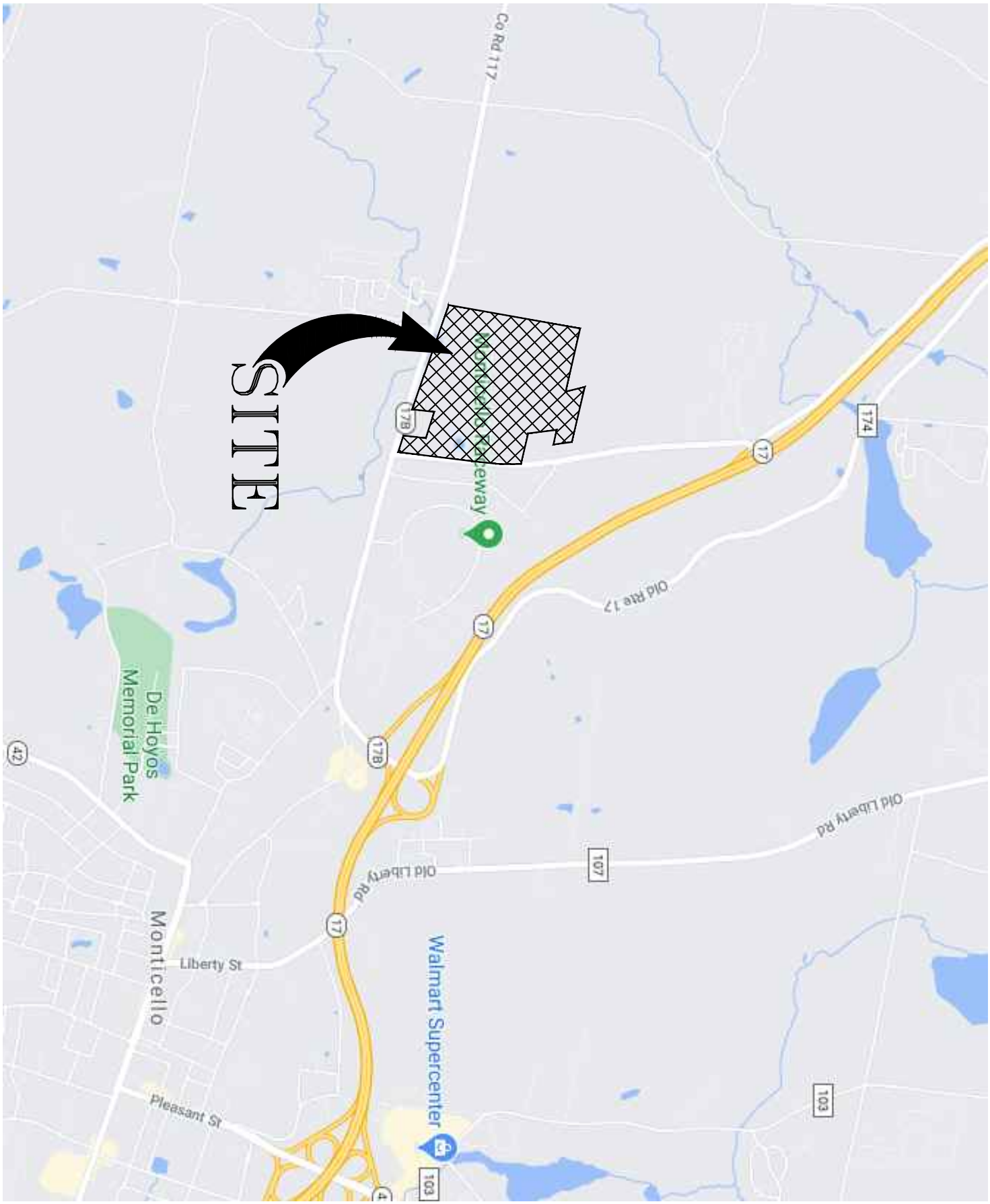
1.2 Site Description

The Project Site is a 153.3-acre, primarily undeveloped parcel, consisting mostly of wooded and wetland areas. There is a small abandon farmhouse along the NYS Route 17B frontage and an abandon commercial building at the corner of NYS Route 17B and Kaufman Road. The current site coverage consists of approximately 125.47 acres of woods, 11.8 acres of meadows, 13.43 acres of wetlands, and 2.6 acres of gravel roads, abandon buildings and trails.

The topography on the Site generally slopes east to west and stormwater flows towards the several low-lying areas of the Site on the northern, central and southern portions of the parcel where the wetlands are located. There is an elevation difference of approximately 96 feet across the Site. The highest elevation on the Site is located along Kaufman Road on the eastern edge of the parcel and is approximately 1390 feet above Mean Sea Level (MSL). The lowest elevation is located near the northwestern corner of the Project Site and is 1294 feet above MSL.

The Site contains a range of soil types, from well drained soils to poorly drained soils. There are no visible bedrock outcroppings on the Site. Based on the soils survey, the average depth to bedrock is greater than five feet.

The Site is privately owned and is not currently authorized for use by the community as open space or as a recreation area. According to the NYSDEC website, the Project Site



LOCATION MAP	BBIS AUTO AUCTION NYS ROUTE 17B TOWN OF THOMPSON SULLIVAN COUNTY, NEW YORK	DATE: 09/15/20	JOB # 1225.03	ENGINEERING & SURVEYING PROPERTIES Achieving Successful Results with Innovative Designs	71 CLINTON STREET MONTGOMERY, NY 12549 Ph: (845) 457-7727 Fx: (845) 457-1899
		SCALE: NTS	SHEET # F-1.1A		

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is not listed as a Critical Environmental Area under Article 8 of the Environmental Conservation Law (ECL), or Chapter 6, Part 617 of the New York Codes, Rules, and Regulations (6NYCRR Part 617).

2.0 PROJECT DESCRIPTION

The Project Site is 153.3 acres in size and is currently owned by the Estate of Leibowitz and Bergari Corp who have each provided owners proxy statements as part of the site plan application. The Proposed Action is construction auto auction facility. The proposal includes storage for up to 11,000 vehicles, eight stormwater basins, a 40-space parking lot and a 8,275 square-foot building.

The proposed development will disturb approximately 96.7 acres of the site. Of the total land disturbance, there will be 74.2 acres of proposed impervious area, which includes the proposed buildings, driveways, parking area and vehicle storage area. Access for all employees, visitors and deliveries to the site will be provide by a private commercial driveway from Kaufman Road (County Route 59). All parking spaces will be paved and will be 10 feet wide by 20 feet deep.

Water service for the Site will be provided by a private well. As the estimated number of employees is less than 25, a NYSDOH public water supply permit is not required. Sewage generated by the Project will flow by gravity to an onsite pump station that will pump the effluent from the building to a septic system to be constructed just north of the entrance driveway. Wastewater flow is project to be 300 gallons per day (20 employees x 15 gpd/employee). The proposed well and septic system locations and design are shown on the full-sized Site Plans.

Table 2.0A tabulates the land cover areas in both the existing and proposed conditions and calculates the change that will occur as a result of the Proposed Action. A total change of land use of 90.50 acres is expected, which includes the new impervious surfaces (structures, walkways, driveways, and parking lots) and lawn/landscaping areas.

Table 2.0A – Proposed Disturbance by Land Cover (Acres)			
LAND COVER	**EXISTING**	**PROPOSED**	**CHANGE***
Woods	125.47	43.61	-81.86
Wetlands	13.43	13.39	-0.04
Meadows	11.8	3.2	-8.60
Impervious Surface	2.6	74.2	+71.6
Lawn/Landscaping/Ponds	0.00	18.9	+18.9
Total	**153.3**	**153.3**	**-**

* Negative numbers indicate a decrease in area; positive numbers indicate an increase in area.

3.0 PERMITS AND APPROVALS REQUIRED

The Proposed Action will require permits or approvals from the following agencies:

LOCAL:

TOWN OF THOMPSON

- Town of Thompson Planning Board – Site Plan and Special Exception Use Approval

COUNTY:

- Sullivan County Department of Public Works – Commercial Driveway Entrance Permit

STATE:

- New York State Department of Environmental Conservation – Stormwater Pollution Discharge Elimination System (SPDES) Permit, Water Quality Certification, and 5-acre disturbance waiver.
- New York State Department of Transportation – Non-Utility Work Permit for signage and shoulder improvements

FEDERAL:

- U.S. Army Corps of Engineers – Wetlands Nationwide Permit for Wetland Disturbance

4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

Part 2 of the Environmental Assessment Form (EAF) lists a series of environmental concerns that may result from a Proposed Action. An evaluation of Part 2 of the EAF for this Project was undertaken to identify any potentially significant adverse environmental impacts. A completed Part 2 FEAF for the Proposed Action is attached in Appendix A. The following areas of potential environmental concern are anticipated:

1. Potential Impact on Land
2. Potential Impact on Surface Water
3. Potential Impact on Plants, Animals and Open Space
4. Potential Impact on Agricultural Resources
5. Potential Impact on Aesthetic Resources
6. Potential Impact on Transportation
7. Potential Impact on Human Health
8. Consistency with Community Plans and Character

The main purpose of this Part 3 Expanded EAF is to provide adequate information to examine all potential environmental impacts identified in Part 2 of the EAF in terms of potential adverse and/or beneficial impacts that may result from the construction and operation of the proposed Project. Each of the identified areas of environmental concern are addressed in the subsections below. For each area of expected concern, existing conditions are described, potential environmental impacts are identified, and as necessary, mitigation measures are proposed to mitigate the potential adverse environmental impacts resulting from the Proposed Action.

4.1 Potential Impact on Land Resources

4.1.1 Existing Conditions

The total parcel area of the Proposed Action is 153.3 acres and consists primarily of woods, wetland areas and abandon hay fields. The parcel is primarily undeveloped, with the exception of an abandon farmhouse along NYS Route 17B and abandon commercial building at the corner of Kaufman Road and NYS Route 17B. Table 4.1A identifies the existing land coverage conditions and areas found on the Project Site.

Table 4.1A – Existing Site Coverage

LAND COVER TYPE	AREA (ACRES)
Woods	125.47
Wetlands	13.43
Meadows	11.8
Impervious Surface	2.6
Total	**153.3**

SOILS

The Project Site contains 13 different soil groups according to the *Soil Survey of Sullivan County, New York*, a publication of the National Cooperative Soil Survey compiled by the U.S. Department of Agriculture, Soil Conservation Service and Cornell University Agricultural Experiment Station. The on-site soil groups include various series complexes including Arnot-Oquaga (AoC), Fluvaquents-Udifluvents (Fu), Lackawanna (LaB & LaC), Morris (MrA), Oquaga (OeB), Palms (Pa), Raynham (Ra), Scriba & Morris (SeB), Swartswood (SrB), Udorthents (Ud), Wellsboro (WeB), Wellsboro & Wurtsboro (WIC), Wurtsboro(WuB).

Table 4.1B lists the various soil types present on the Project Site, their on-site acreages, and associated characteristics. Figure 4.1A depicts the location of each soil type found on the Site.

SOILS	BBIS AUTO AUCTION NYS ROUTE 17B TOWN OF THOMPSON SULLIVAN COUNTY, NEW YORK	DATE: 09/15/20	JOB # 1225.03	ENGINEERING & SURVEYING PROPERTIES Achieving Successful Results with Innovative Designs
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Table 4.1B – On-Site Soil Types				
Soil	**Symbol**	**Acres**	**Slope Range**	**Hydrologic Group**
Arnot- Oquaga	AoC	21.6	0-15%	D
Fluvaquents-Udifluvents	Fu	2.1	0-3%	D
Lackawanna	LaB & LaC	3.9	3-15%	C
Morris	MrA	16.5	0-3%	D
Oquaga	OeB	16.2	3-8%	C
Palms	Pa	2.4	0-2%	D
Raynham	Ra	8.5	0-3%	D
Scriba & Morris	SeB	20.9	2-8%	D
Swartswood	SrB	0.1	3-8%	D
Udorthents	Ud	0.3	0-15%	D
Wellsboro	WeB	40.3	3-8%	D
Wellsboro & Wurtsboro	WIC	19.9	0-15	D
Wurtsboro	WuB	0.7	3-8%	D

TOPOGRAPHY

Topography on the Site generally slopes east to west and towards the low-lying areas of the Site where the wetlands are located on the central, northern and southern sides of the parcel. The highest elevation on the Site is approximately 1390 feet above Mean Sea Level (MSL) and is located along Kaufman Road at the proposed site entrance. The lowest elevation, which is 1294 feet above MSL, is located near the northwest corner of the Project Site. Topography of the Site is depicted in the full-sized set of plans.

Slopes on the Project vary from gentle within the wetland areas and on the south and central portions of the Site, to steeper in the northern portion. Table 4.1C lists the existing slope range areas found on the Project Site.

Table 4.1C – Existing Slopes		
SLOPE CATEGORY (%)	**AREA (ACRES)**	**PERCENTAGE OF SITE (%)**
0-10	127.50	83.2
10-15	15.64	10.2
> 15	10.16	6.6
TOTAL:	**153.30**	**100**

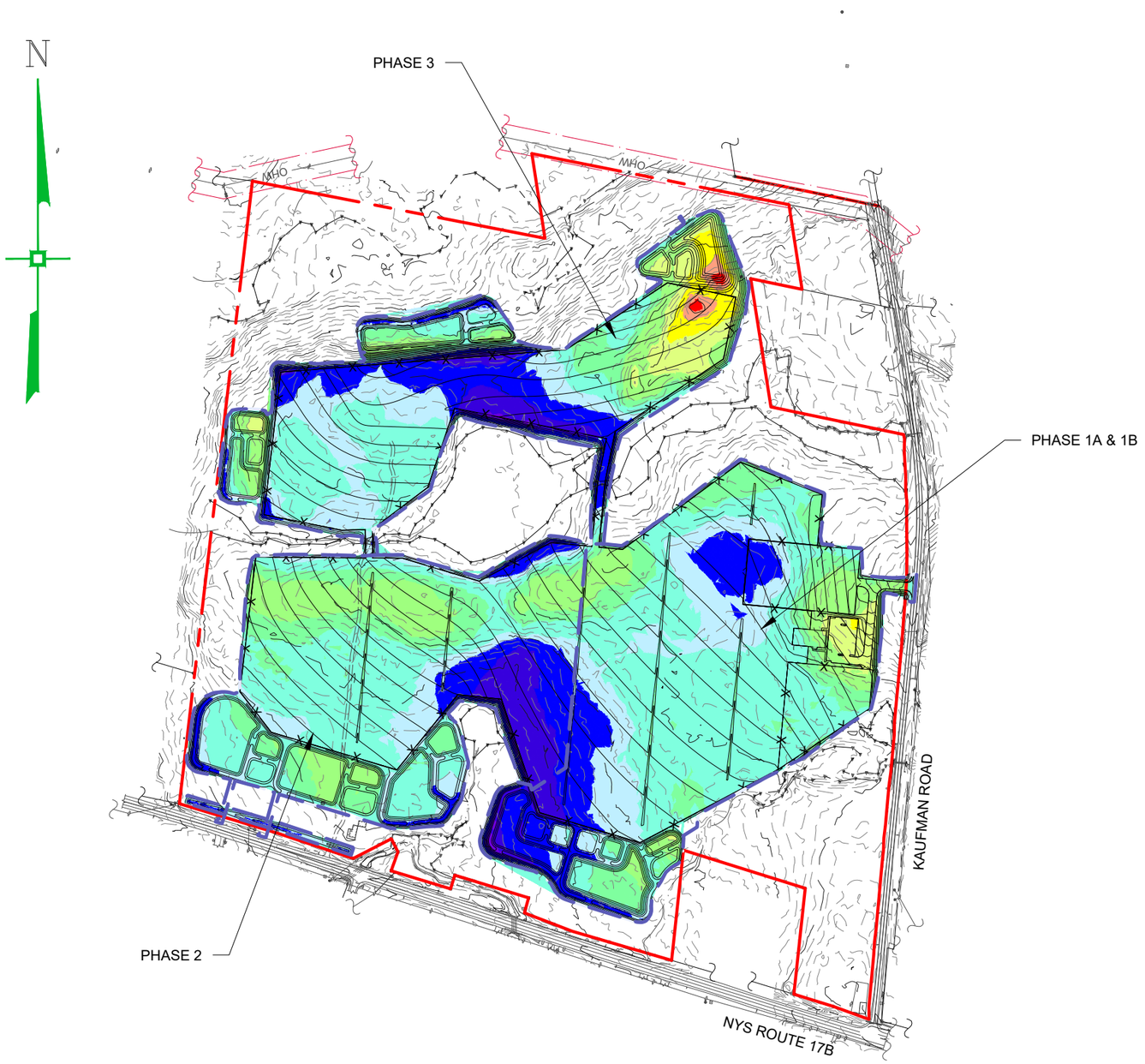
AGRICULTURAL LANDS

Based on the most recent Agricultural District Map provided by the Sullivan County Planning Department, neither the Site itself nor any of the surrounding properties are included in either of the County's Agricultural Districts.

4.1.2 Potential Impacts on Land Resources

DISTURBANCE OF SOILS

The greatest potential adverse impact to land resources is the disturbance of soils due to the physical alteration of soils and topography that will result from the construction of vehicle storage areas, driveways, parking lots and the office building. Grading of the Site is required to construct the Proposed Action. A Cut/Fill Figure showing phasing and site cuts and fills has been submitted to the Board and is attached as Figure 4.1B. It is estimated that the volume of earthwork between the existing and finished grades consists of 290,000 cubic yards of cut material, and 304,000 cubic yards of fill material, resulting in a net fill of 14,000 cubic yards. The largest earthwork cuts are located along Kaufman Road in the area of the driveway and parking lot for the building, and along the northeast side of Phase 3. The largest fill areas are located around the wetland area between Phases 2 and 3. Based on the geotechnical investigation (included as Appendix C), bedrock is estimated to be located at a depth of 4 feet to greater than 14 feet in the areas of Phase 1 and 2, and a depth of 2 feet to 5 feet in the area of Phase 3. Rock is expected to be encountered within the proposed limit of disturbance in the areas of cut on the east side of the site (represented by the light green, yellow and red areas on the "Cut/Fill Figure"). All rock removal will first be attempted by mechanical means. If necessary, blasting will be utilized to remove rock. Any blasting would be performed by a licensed contractor in conformance with the Town's blasting requirements set forth in Chapter 113 Article 3 of the Town Code entitled Drilling and Blasting.



-28 TO -25

-25 TO -20

-20 TO -15

-15 TO -10

-10 TO -5

-5 TO -2

-2 TO 2

2 TO 5

5 TO 10

10 TO 15

15 TO 16

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DATE: 09/15/20

SCALE: 1" = 50'

BBIS AUTO AUCTION
NYS ROUTE 17B
TOWN OF THOMPSON
SULLIVAN COUNTY, NEW YORK

CUT/FILL & PHASING PLAN

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The disturbance of existing soils has the potential to increase soil erosion and sedimentation when soils are excavated during construction. Phase 1, which includes the building is estimated to take approximately 9 months to complete. It includes two sub-phases, Phase 1A is 25.9 acres and Phase 1B is 9.26 acres. Each subsequent phase, Phase 2 and Phase 3, will take approximately 6 months to complete and consist of 28.9 acres and 25.7 acres respectively. Phase 2 and Phase 3 would not be constructed until the previous phase is completed and fully occupied. The total area of disturbance resulting from the Project will be 96.7 acres.

The potential for erosion can be exacerbated by large areas of disturbance, disturbance of steep slopes, disturbance of highly erodible soils, poor on-site management of soils, and erosion control techniques. Disturbance by slope range category on the Project Site is listed in Table 4.1D.

Table 4.1D – Proposed Disturbance by Slope Range

SLOPE RANGE (%)	AREA OF DISTURBANCE (ACRES)
0-10	85.84
10-15	7.51
> 15	3.35
TOTAL:	**96.7**

While some disturbance of soils is unavoidable, the grading plan has been designed to minimize impacts due to the anticipated earthwork. A detailed grading plan for the proposed site improvements is included in the full plan set. Due to the relatively large area of contiguous driveways and vehicle storage, more than five acres (up to 29 acres) of the Site will be disturbed at one time. Accordingly, the Applicant will seek a waiver from the five-acre disturbance limitation from the New York State Department of Conservation. The waiver will allow the contractor to more efficiently construct the Site and balance the earthwork to the greatest extent practical, thereby limiting the amount of time disturbed soils are

susceptible to erosion. The five-acre waiver will require coordination with and approval by the NYSDEC.

EROSION & SEDIMENTATION

It is anticipated that erosion and sedimentation could also create a potential impact due to the on-site soil disturbance during construction. Erosion is defined by the New York State Department of Environmental Conservation (NYSDEC) as the "wearing away of the land surface by running water, wind, ice or other geological agents", and sediment is defined as "solid material, both mineral and organic, that is in suspension, is being transported, or has been moved from its site of origin by air, water, gravity, or ice and has come to rest on the earth's surface either above or below sea level".[1] While both erosion and sedimentation are intrinsic natural processes, in many places they are increased by human land use. A certain amount of erosion and sedimentation is natural and, in fact, healthy for the ecosystem. Excessive erosion, however, can cause problems, such as degradation of surface waters, ecosystem damage, and the outright loss of soil. Poor land use practices such as deforestation and unmanaged construction activity are the largest causes of excessive erosion. Construction of the Project will result in some amount of soil erosion and sedimentation when soils are disturbed and relocated on-site. This potential erosion can be in the form of sediment laden stormwater, or airborne dust from construction activities on exposed soil areas during dry weather.

[1] New York Standards and Specifications for Erosion and Sediment Controls, Appendix H: Glossary, www.dec.ny.gov/chemical/29066.html

4.1.3 Land Resource Mitigation Measures

DISTURBANCE OF SOILS

Although the total ground disturbance is estimated to be 96.7 acres, a construction phasing plan has been developed for the Project that will limit the amount of disturbance at any one time to a maximum of 29 acres. All topsoil within the disturbed area will be stockpiled for later use on-site. Cut soils generated by the project will be reused on-site as fill material to the greatest extent feasible. Any material that is unusable for structural fill will be used in the construction of the berm and then if necessary, disposed of offsite in accordance with all applicable Town of Thompson and the New York State Department of Environmental Conservation regulations.

Since the Applicant is seeking a waiver from the five-acre disturbance limitation from the New York State Department of Conservation, the Applicant is proposing to implement the following mitigation measures:

- All disturbed areas to remain idle for more than 14 days shall be stabilized within 48 hours and before any forecasted rainfall. Stabilization measures could include straw, mulch, or geosynthetic material.
- Temporary erosion control measures such as silt fencing, hydroseeding, berms and diversion swales will be used extensively to prevent erosion.
- Catch basin inlet protection and sediment basins will be used to remove any sediment that is conveyed by runoff from the Site.
- To minimize stockpiling of soils, earthwork cuts and fills shall be balanced, to the greatest extent practicable, within each phase.

With these measures in place, the potential impact resulting from the increase of disturbance area beyond five acres will not be significant.

EROSION AND SEDIMENT CONTROL PLAN

Erosion due to soil disturbance is unavoidable and will be mitigated by project design. To reduce the potential for soil erosion, preventative measures will be implemented in

conformance with NYSDEC standards. Detailed Erosion and Sediment Control Plans for the Project are designed and included in the full plan set.

All construction activities are proposed to proceed in a manner that is designed to avoid sediment from entering any wetland, watercourse, water body, and/or conduit carrying water. Proposed measures to be employed during construction include the following:

- Stormwater runoff from the Site will be captured, stored and treated in stormwater facilities to remove sediment prior to being discharged from the Site. Stormwater mitigation is discussed further in Section 4.2.
- Existing vegetation will be retained when possible. Following construction, permanent vegetation will be established on all exposed soils.
- Site preparation activities will be designed to minimize the area and duration of soil disturbance.
- Permanent traffic corridors will be established and routes of convenience through the Site ("shortcuts") shall be avoided.
- Stabilized construction entrances will be installed at all points of entry into the Project Site and to each independent phase to minimize dust and tracking of soil material from construction areas.
- Storm drain sediment inlet filters will be constructed at storm drains as required. These measures will be maintained in good condition until the final vegetative cover is well established on all disturbed areas upstream of the inlet.
- No erodible materials will be stockpiled within 25 feet of any ditch, stream or other surface water body.

- Removal of healthy trees along the limits of disturbance will be avoided, where possible. No construction materials will be stored, and no machinery operated outside the limits of disturbance, as shown on the Site Plans.
- All slopes of 2:1 or steeper will be stabilized with jute netting and hydro-seed.
- Any washouts will be immediately repaired, reseeded and protected from further erosion.
- All accumulated sediments will be removed and contained in appropriate spoil areas.
- Water will be applied to newly seeded areas as needed until grass cover is established.
- To effectively control wind erosion, water will be applied to all exposed soils as necessary.

All erosion control measures will be inspected in accordance with NYSDEC standards by a qualified professional for the duration of the construction process. Specifically, the Site will be inspected twice every seven (7) days by a qualified inspector and proper logs and reports will be maintained. Proper maintenance of all erosion control items will ensure the optimum operation of the proposed erosion and sedimentation controls.

With the aforementioned mitigation measures in place, the potential for soil erosion and sedimentation to occur will be limited.

CONSTRUCTION BEST MANAGEMENT PRACTICES

To minimize the effect of undesirable soil compaction during construction, several best management practices will be employed during the construction of the Project. The limits of disturbance will be clearly delineated in the field prior to any earthwork. In critical areas, such as near water bodies and wetlands, fencing is effective to prevent construction vehicles from erroneously entering areas that are not to be disturbed.

Furthermore, construction traffic will travel on designated construction routes throughout the Site. "Routes of convenience" through the Site will be avoided. By restricting construction traffic to designated areas, overly compacted soils in landscaped areas will be minimized. All areas to be re-vegetated upon completion of construction will be "de-compacted" through soil restoration, including tilling and scarifying the underlying soil layer to mature root depths, and prepared to receive new plantings.

4.1.4 Land Resource Conclusion

With conformance to the engineered grading plan, construction phasing plan, implementation of the erosion and sediment control plan, and construction best management practices, any adverse environmental impacts to land resources resulting from the construction of the Proposed Action will be mitigated so that such impacts will not be significant.

4.2 Potential Impact on Surface Water Resources

4.2.1 Existing Conditions

Surface water resources located on the Project Site include both natural and manmade drainageways, a United States Army Corps of Engineers (USACOE) designated wetlands, and NYSDEC designated wetlands. The on-site surface water resources are depicted on the full-sized plan set.

SURFACE WATERBODIES

There are four natural drainageway that traverse the site from east to west. The first drainageway is an unnamed, Class "B" tributary and its associated wetlands that drains from east to west across the southern portion of the site. The tributary enters and exits the Site for about 700 feet along NYS Route 17B near the south property line. This tributary is encompassed by a FEMA designated 100-year floodplain. The second drainageway enters the site from Kaufman Road just south of the proposed site entrance. The stormwater from this drainageway flows through onsite wetlands to the southeast and exits the site on the southern property line along NYS Route 17B. The third drainageway the enters the site from Kaufman Road just north of the proposed site entrance. Stormwater flows from east to west through onsite wetland areas and exits the site on the western property line to undeveloped lands along the common property line with N/F Koutsouras. The fourth drainageway is an unnamed, Class "B" tributary that flows from east to west through the northern most onsite wetland system. All drainageways ultimately flow to the Kinne Brook at a point over a mile south and west of the Site.

WETLANDS

There are seven freshwater wetland areas that encompass the lowest lying areas of the Site. The wetlands are all believed to be federally regulated under the jurisdiction of the

United States Army Corps of Engineers (USACOE). Only one of the seven wetland areas is under the jurisdiction of the NYSDEC. The wetlands were delineated in the field by Peter D. Torgersen in July 2018 and September 2019, and the wetland flags were located by Engineering & Surveying Properties, P.C. on a map entitled NYSDEC Wetland Delineation Plan dated February 25,2020, which is attached in Appendix D1.

The wetlands were delineated in compliance with criteria set forth in the 1987 United States Army Corps of Engineers *Corps of Engineers Wetlands Delineation Manual* (Technical Report Y-87-1). The on-site area of Wetland "A" is 8.150 acres, Wetland "B1" is 2.930 acres, Wetland "B2" is 1.488 acres, Wetland "C" is 0.694 acres, Wetland "D1" is 0.257 acres, Wetland "D2" is 0.507 acres and Wetland "E" is 0.436 acres. An Army Corps jurisdictional determination was requested by Mr. Torgersen on April 30, 2020. To date, a representative from the USACOE has not yet visited the Site to confirm the boundaries of the wetlands and a jurisdictional determination has not been issued.

The wetlands delineation was also submitted to the NYSDEC on February 25, 2020 and a site walk was conducted with the NYSDEC on June 3, 2020. Wetland areas "B1" and "B2" were determined to also be under the jurisdiction of the NYSDEC and are shown on NYSDEC adopted wetlands maps as wetland MO-49. The above referenced plan was submitted to NYSDEC for final signoff and a signed copy will be provided to the Town upon receipt.

STORMWATER

A Stormwater Pollution Prevention Plan (SWPPP) has been prepared by Engineering & Surveying Properties, P.C to analyze existing stormwater discharges from the Site. The SWPPP is attached as Appendix D2. The SWPPP identifies four distinct drainage areas with four discharge points. Discharge Point "A" is located along NYS Route 17B opposite

Hamilton Road where the natural drainageway discharges through a large box culvert. Discharge Point "B" is located in NYS Route 17B roadside swale at the western end of the Site. Discharge Point "C" is located within federal wetlands along the western property line along lands of N/F Koutsouras. The final Discharge Point "D" is located along the northern property line within NYSDEC Wetlands MO-49. The existing drainage area boundaries are shown in the SWPPP.

The existing on-site drainage patterns follow the natural topographic features, which collect and convey stormwater runoff. Stormwater eventually discharges into the Kinne Brook approximately one mile southwest of the Site. The Project Site is not located within a NYSDEC Division of Water's regulated Municipal Separate Storm Sewer System (MS4) area.

4.2.2 Potential Impacts on Surface Water Resources

Areas of environmental concern with respect to surface waters include wetland disturbance, soil erosion, stormwater runoff, and water quality.

WETLANDS

Construction of the proposed Project will result in the disturbance of 0.045 acres of USACOE jurisdictional Wetland "A", which is less than the 0.1-acre threshold requiring an individual wetlands disturbance permit. Approximately 0.027 acres of the wetland disturbance will result from the proposed northern access drive to Phase 3 and the remaining 0.018 acres will result from the proposed southern access drive to Phase 3.

EROSION & SEDIMENTATION

Due to disturbance of on-site soils during construction, it is anticipated that erosion and sedimentation are potential impacts to surface water resources. Potential impacts produced by erosion and sedimentation are discussed in detail in Section 4.1.2.

STORMWATER

The increased area of impervious surface proposed as part of the Project has the potential to degrade water quality both onsite and downstream from the Site. The Project will create approximately 74.2 acres of impervious surface area consisting of buildings, driveways, parking lots and vehicle storage areas. To analyze the post-development stormwater condition, watershed area "A" was divided into five subareas, watershed area "B" was divided into three subareas, watershed area "C" was divided into two subareas and watershed area "D" was divided into three subareas as detailed in the SWPPP.

The SWPPP also describes 18 stormwater quality, pre-treatment facilities and eight stormwater ponds that are incorporated into the Site's stormwater management design. The stormwater facilities are designed to detain stormwater from developed areas to treat sediment and pollutants from proposed vehicle storage areas, buildings, driveways, and parking areas by allowing sufficient time for pollutant settlement and filtration before the stormwater discharges from the facility. As the Site is considered a potential stormwater "hotspot", each of the eight stormwater facilities will be proceeded by two stormwater quality treatment facilities. The stormwater treatment facilities consist of a water quality pond and a sand filter for each drainage area. Stormwater quantity will be addressed by the eight wet extended detention ponds. The stormwater facilities will be owned and maintained by the landowner. Regular inspection and maintenance of the proposed stormwater management practices (SMP's) is required to ensure their long-term function and effectiveness and is discussed more fully in the SWPPP.

WATER QUALITY

To ensure proper treatment of post-development sedimentation and pollutant loading resulting from the newly constructed impervious areas, the stormwater management

practices have been designed to handle the required Water Quality Volume ("WQv") as defined by the NYSDEC. Each of the proposed practices provide adequate storage of the required WQv, ensuring that NYSDEC post-development pollutant removal goals are meet.

Green infrastructure will be utilized on the Project Site. Green Technologies are incorporated to effectively treat water quality and infiltrate runoff into the ground to the maximum extent possible. The types of green technologies incorporated into the SWPPP include conservation of natural areas and sand filters. As the Project Site is not located within a NYSDEC Division of Water regulated MS4 area, a Municipal Separate Storm Sewer System (MS4) approval is not required from Town of Thompson.

4.2.3 Surface Water Resource Mitigation Measures

To reduce the potential impacts that the Proposed Action may have on existing surface water resources, several mitigation measures are proposed. These measures include a properly planned and implemented Erosion and Sediment Control Plan to address the construction phase impacts of the Project, and a Stormwater Pollution Prevention Plan (SWPPP) which is designed to mitigate peak stormwater runoff flows and water quality, and includes green infrastructure to address potential long-term project impacts.

EROSION AND SEDIMENT CONTROL PLAN

To control the impacts that construction may have on the onsite surface waters, wetlands, and downstream receiving waters, a detailed Erosion and Sediment Control Plan has been prepared for the Site, which is fully discussed in Section 4.1.3, and is included as a full-sized plan set. All erosion control measures will be in place for the duration of the construction phase, subject to regular inspection and field adjustment as necessary.

STORMWATER POLLUTION PREVENTION PLAN

NYSDEC regulations require that all construction activities involving one acre or more of land disturbance obtain a State Pollutant Discharge Elimination System (SPDES) General Permit for stormwater discharge from construction activities. The current General Permit issued to provide coverage for these activities is NYSDEC GP-0-20-001. To obtain coverage under the General Permit, a Stormwater Pollution Prevention Plan (SWPPP) has been prepared and is included as Appendix D2. A Notice of Intent (NOI) will be filed with the NYSDEC before construction begins. The General Permit requires the incorporation of green infrastructure to reduce the volume of stormwater runoff and to treat a portion of the Water Quality Volume (WQ_v).

The SWPPP was prepared using the January 2015 *New York State Stormwater Management Design Manual* to assess existing and proposed drainage patterns, to design the stormwater facilities for the Site, and to mitigate potential stormwater impacts. The proposed stormwater facilities are designed to mitigate water quality impacts from proposed impervious surfaces and will be installed during the project's construction.

Maintenance of the on-site stormwater facilities is required to assure their long-term function and viability. The on-going maintenance of the facilities will be the responsibility of the owner. Maintenance is more fully discussed in the SWPPP but as a minimum shall include:

- Routine inspections of all stormwater facilities at least twice a year and after every storm event that exceeds 7 inches of precipitation in a 24-hour period.
- Mowing of stormwater basins at least once every other week during the growing season.

- Maintaining all landscaping lawns, plants, shrubs and trees in good living condition. All dead landscaping shall be replaced during the next planting season with a plant of similar species and size.
- Removing accumulated sediment from stormwater facilities including basins, catch basins and swales. Sediment shall not be allowed to accumulate more than 50% of the facility's capacity.
- Pavement sweeping and removal of catch basin sump debris to prevent collected sediment from reaching and deteriorating the downstream surface waters.

WETLANDS

Despite efforts to locate all proposed improvements outside the designated wetland boundaries, some minimal wetland disturbance is unavoidable. The proposed project will result in the disturbance 0.045 acres of federally designated wetlands. In order to mitigate potential adverse impacts to the wetland on the Project Site, an Erosion and Sediment Control Plan, as described in Section 4.1.3, will be implemented.

4.2.4 Surface Water Resources Conclusion

Although the Proposed Action involves land grading, increased amounts of impervious surfaces, modification of on-site stormwater runoff patterns, and minor disturbances to federal wetland areas, the implementation of erosion and sediment control measures and a Stormwater Pollution Prevention Plan, as outlined above, will eliminate potential significant adverse environmental impacts to surface waters that may result from the construction and operation of the Project.

4.3 Potential Impacts on Plants and Animals

4.3.1 Existing Conditions

The site is mostly undeveloped apart from an abandon farmhouse along NYS Route 17B and an abandon commercial building on the corner of NYS Route 17B and Kaufman Road. The land cover is primarily mature forest habitat having dominant upland tree species consisting primarily of white pine, red maple, sugar maple, eastern hemlock, black birch, white ash, and American beech. Forested wetland habitat exists in the wetland corridor that runs through the Site. Offsite, the parcel is bordered by a state highway on the south, a manufactured home park on the west, woodlands and an overhead power transmission line on the north, and a county road on the east. Existing impacts to plant and animal habitats near the Site are limited to noises and activities related residential activities of the nearby manufactured home communities and commercial traffic on nearby State and County roadways.

The property is located in an area noted for potentially having certain threatened or endangered species. The United States Fish and Wildlife Service (USFWS) lists the Threatened Northern Long Eared Bat as being potentially present in the area of the Site. However, the New York State Department of Conservation (NYSDEC) indicates in their letter dated February 4, 2020 that according to the State's Natural Heritage records, there are no state-listed endangered or threatened species or other significant habitats on or adjacent to the Site.

4.3.2 Potential Impacts to Plants and Animals

A Wildlife Habitat Assessment dated July 20, 2020 was prepared by Ecological Analysis, LLC to further analyze the potential impacts to wildlife and wildlife habitat. This assessment is attached as Appendix E. In addition to the potential impacts to the Northern

Long-eared Bat, the assessment reviewed the potential for impacts to other threatened and endangered species including the Bog Turtle, Mud Turtle, Eastern Tiger Salamander, Northern Cricket Frog, Indiana Bat, Northern Fence Lizard and Timber Rattlesnake. Habitat was also evaluated for several species of special concern including the Eastern Box Turtle, Wood Turtle, Spotted Turtle, Eastern Hognose Snake, Worm Snake, and three Mole Salamander species.

Based on this assessment it is expected that some temporary displacement of on-site wildlife will occur due to the construction of the Proposed Action. The development plan shows that corridors for wildlife movement will remain connected to adjected off-site tracts of land and the undisturbed wetland areas on and adjacent to the site will allow for free movement of species through the site as well as onto adjacent lands.

Therefore, the Proposed Project is not expected to cause any adverse impacts to threatened and endangered species or other wildlife species of special concern

4.3.3 Plants and Animals Mitigation Measures

To protect the Northern Long Eared bat, tree removal at the site will be limited to November 1st until March 31st. Since no other adverse impacts to plant and animal resources are expected from the Proposed Action, no additional mitigation measures are proposed.

4.3.4 Plants and Animals Conclusion

The NYSDEC has no records of rare or state-listed animals, plants or significant communities specifically located on the Project Site, and current wildlife species inhabiting the Site are expected to be temporary displaced. Tree removal limitations at the Site will ensure that no significant adverse impacts to the only threatened species, the Northern Long Eared Bat, will result from the Proposed Action.

4.4 Potential Impact on Agricultural Resources

4.4.1 Existing Conditions

According to the map issued by the Sullivan County Planning Department entitled *Agricultural Districts Sullivan County, NY*, dated October 13, 2017, the project parcel is not currently included in either of the county's two agricultural districts. While portions of the Project Site have been historically used for agricultural practices, as is evidenced by the stonewalls and approximately 12 acres of abandon field areas onsite, a review of historical photos shows that the Site has not been actively utilized for agriculture in over 20 years. The remaining portions of the Site are comprised of forested areas and wetlands.

The project site contains only 3.9 acres of prime agricultural soils and 73.8 acres of agricultural soils of statewide importance as defined by the United States Department of Agriculture's (USDA) Natural Resource Conservation Service. The prime agricultural soil is Lackawanna, and agricultural soils of statewide importance include Morris, Aquaga, Swartswood, Wellsboro and Wurtsboro complexes. The remaining 75.6 acres of the project site are comprised of non-agricultural soils.

Further evidence of the lack of agricultural activity on the Site is the New York State Office of Real Property Services property class codes. These codes were developed by the New York State Office of Real Property Services (NYSORPS) to create a simple and uniform classification system for use by the assessment administration in New York State. The two parcels that comprise the Site are currently listed as property class 260 – Seasonal Residence and 484 - Commercial.

4.4.2 Potential Impacts to Agricultural Resources

The Proposed Action will result in the permanent transformation of approximately 77.7 acres of designated agricultural soils into an auto auction facility. The Site represents a very small portion of the agricultural soils within the Town of Thompson, and Sullivan County. The parcels are also of relatively low agricultural use quality because of their proximity to heavily commercialized portions of the Town of the Thompson.

4.4.3 Agricultural Resources Mitigation Measures

As the Project Site represents only a small fraction of the County's agricultural lands and has not been used for agricultural purposes in many years, there are no mitigation measures proposed.

4.4.4 Agricultural Resources Conclusion

Although the Proposed Action will result in the loss of vacant agricultural lands, due to the abundance of agricultural soils in Sullivan County and the proximity of the site to developed areas of the Town of Thompson no impact to agricultural resources is expected.

4.5 Impacts on Aesthetic Resources

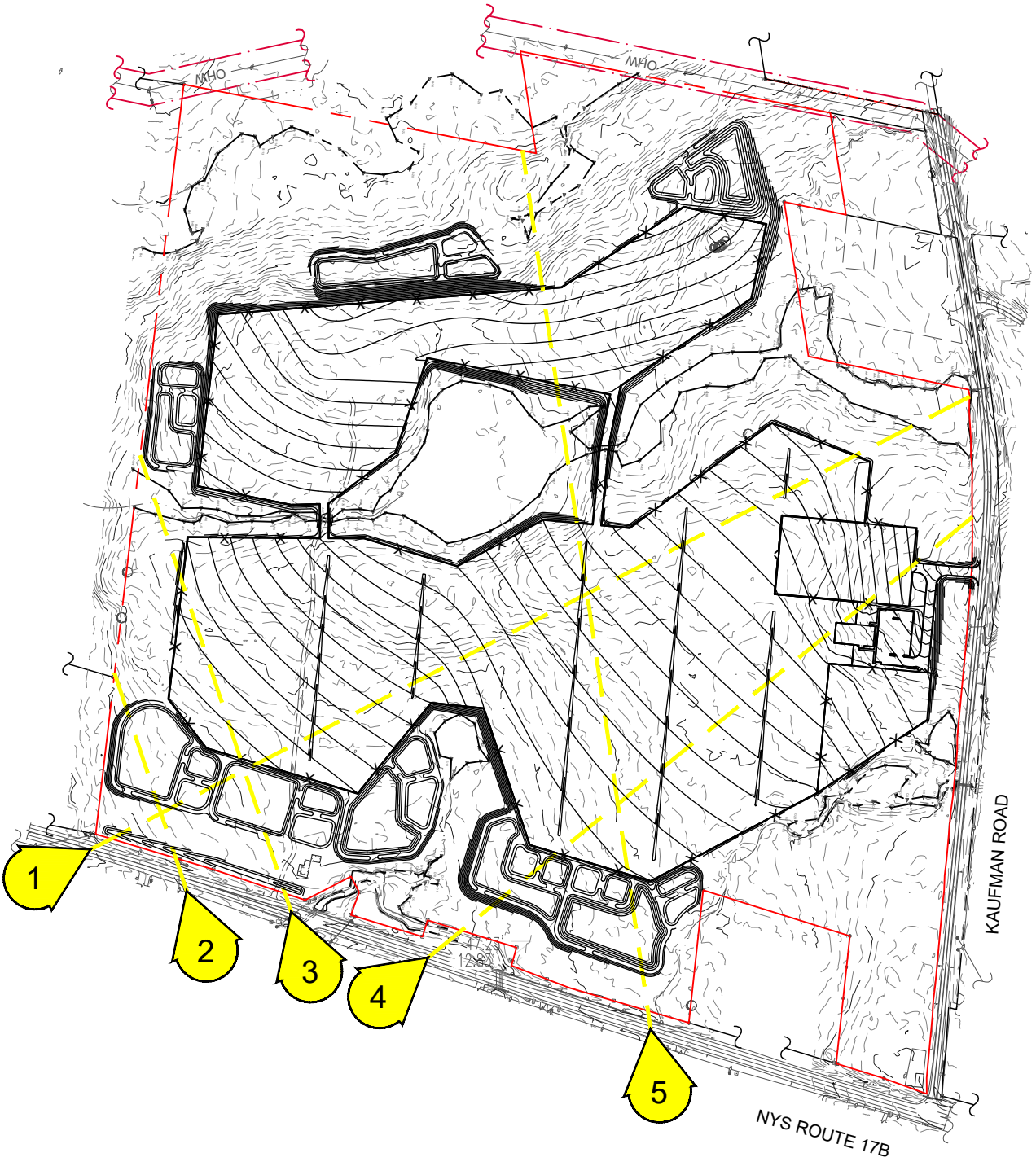
4.5.1 Existing Conditions

Viewsheds

The Proposed Action is located in a largely commercial portion of the Town of Thompson. While the Project Site is primarily vacant, an abandon farmhouse and small commercial building occupy the site's frontage along NYS Route 17B. The Site is adjacent to the Monticello Casino and Raceway, an electrical substation to the east on Kaufman Road, an abandon night club, Dynasty Cottages and Kinnebrook manufactured home community to the south across NYS Route 17B, Brookside Mobile Home Park and vacant woodlands to the west, and a large overhead power transmission line and vacant woodlands to the north. Views into the Project Site from adjacent roadways are mostly shielded by vegetation and trees on all sides, except for the area on the western NYS Route 17B frontage. To assess the visual impact of the Project on motorists traveling along NYS Route 17B, a viewshed analysis was prepared at five locations along the Site's frontage on NYS Route 17B. These locations are depicted on Figure F-4.5A and discussed further below.

1. Viewpoint #1: NYS Route 17B at western most property line
2. Viewpoint #2: NYS Route 17B in front of Kinnebrook community
3. Viewpoint #3: NYS Route 17B at the intersection of Hamilton Road
4. Viewpoint #4: NYS Route 17B in front of Dynasty Cottages
5. Viewpoint #5: NYS Route 17B in front of abandon night club

Figures F-4.5B1 through F-4.5B5 provide photos depicting the existing views into the site from the viewpoint locations and the visual cross-section from each viewpoint.



VISUAL ASSESSMENT LOCATION PLAN	BBIS AUTO AUCTION NYS ROUTE 17B TOWN OF THOMPSON SULLIVAN COUNTY, NEW YORK	DATE: 09/15/20 SCALE: 1" = 500'	JOB # 1225.03 SHEET # F-4.5A	ENGINEERING & SURVEYING PROPERTIES Achieving Successful Results with Innovative Designs

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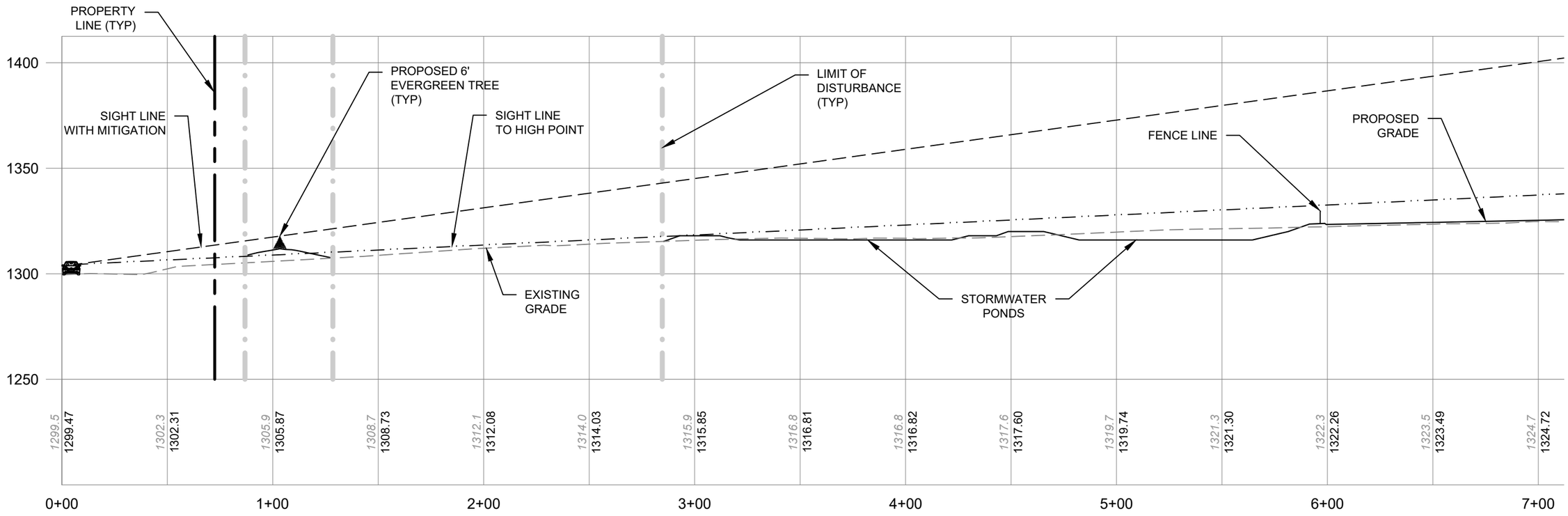

PICTURE 1 CROSS-SECTION

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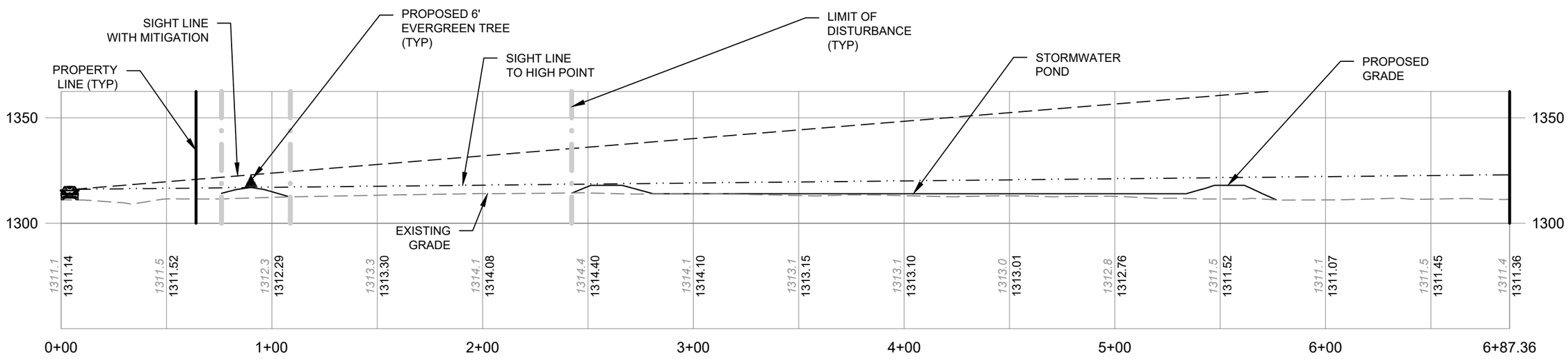

PICTURE 2 CROSS-SECTION

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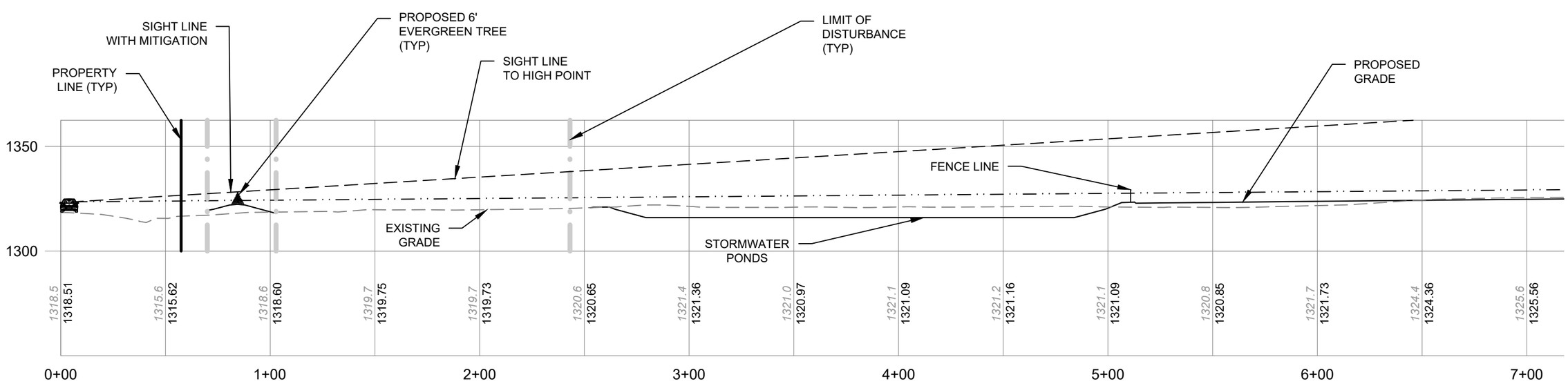

PICTURE 3 CROSS-SECTION

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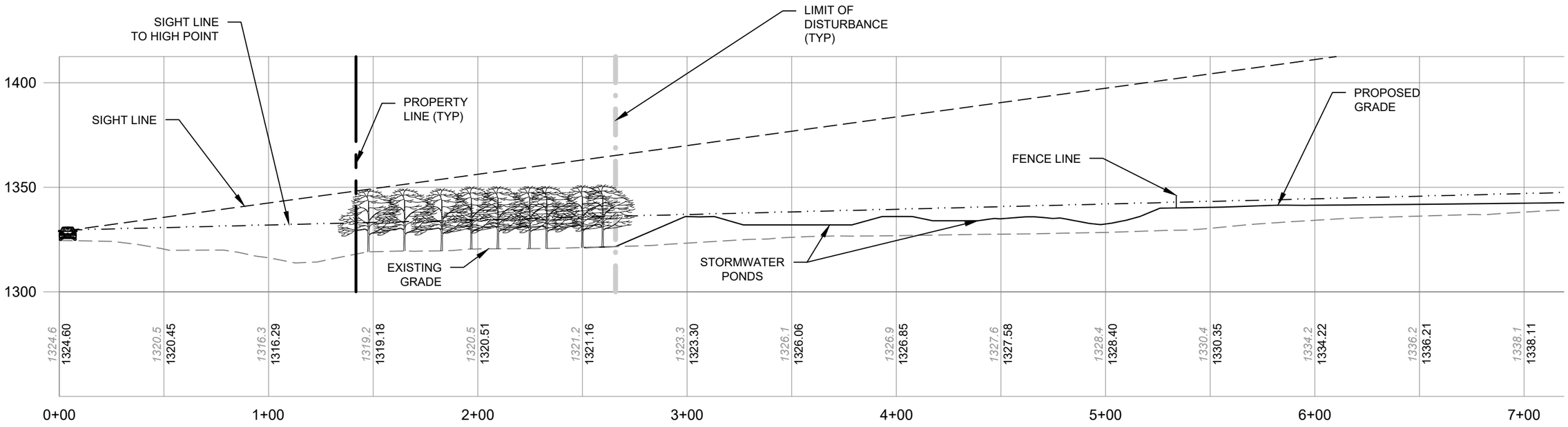
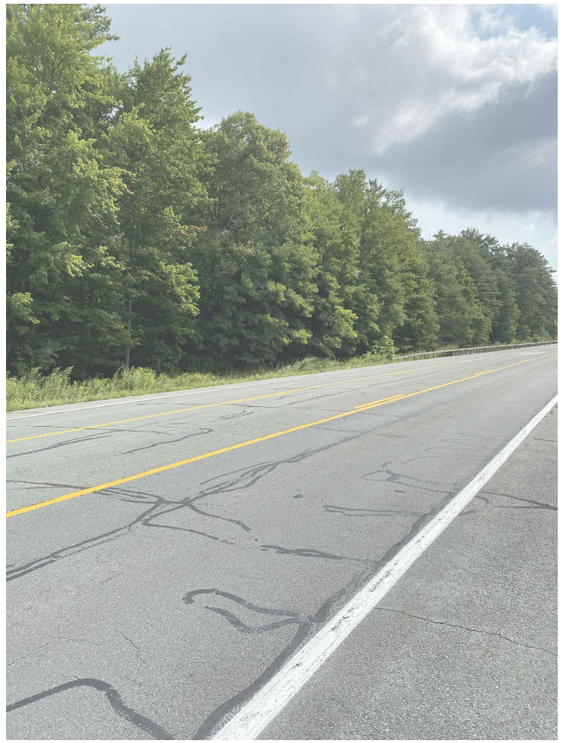


PICTURE 4 CROSS-SECTION



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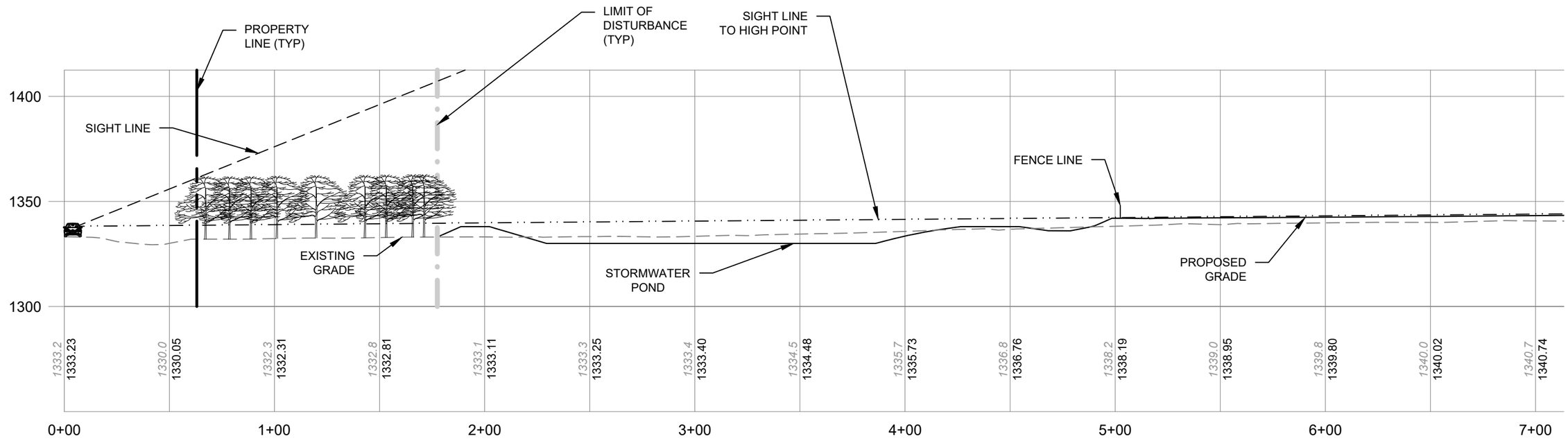
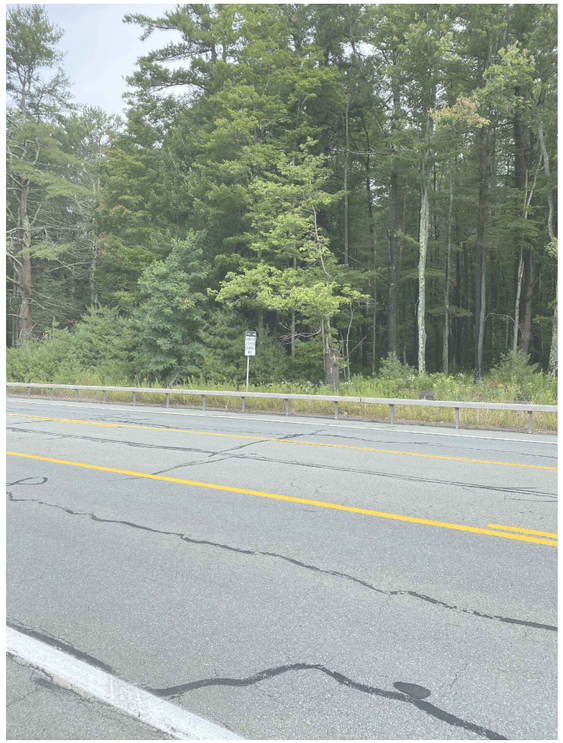


PICTURE 5 CROSS-SECTION



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Viewpoint #1: (Figure F-4.5B1) From this viewpoint the Project Site is observed from NYS Route 17B eastbound near the Project's western most property line. Looking northeast is an abandon field with a row of mature trees beyond.

Viewpoint #2: (Figure F-4.5B2) From this viewpoint the Project Site is observed from NYS Route 17B westbound in front of Kinnebrook community. Looking northwest is an abandon field with a row of mature trees beyond.

Viewpoint #3: (Figure F-4.5B3) From this viewpoint the Project Site is observed from NYS Route 17B westbound adjacent to Hamilton Road. Looking northwest, the abandon farmhouse with a row of mature trees and smaller spruce trees along the NYS Route 17B frontage is visible.

Viewpoint #4: (Figure F-4.5B4) From this viewpoint the Project Site is observed from NYS Route 17B looking eastbound in front of Dynasty Cottages. Looking northeast is a heavily wooded area of mature trees.

Viewpoint #5: (Figure F-4.5B5) From this viewpoint the Project Site is observed from NYS Route 17B looking westbound in front of the abandon night club. Looking northwest is a heavily wooded area of mature trees.

4.5.2 Potential Impacts on Aesthetic Resources

Viewsheds

Construction of the Proposed Action will result in the conversion of 96.7 acres of currently vacant lands into an auto auction facility. The proposed Project will result in the construction of vehicle storage areas, a building, roadways, parking areas, stormwater management facilities, and associated utility infrastructure.

To assess the visual impact to the traveling public on NYS Route 17B, each viewpoint discussed above in the existing condition was analyzed for the proposed condition. A cross

section from each viewpoint is included in Figures F-4.5B1 through F-4.5B5 showing the existing natural features that will remain, the proposed fence around the vehicle storage area, and the proposed grading.

Viewpoint #1: (Figure F-4.5C1) The proposed vehicle storage area and associated stormwater facilities would be visible from this viewpoint. To mitigate this view, a stonewall with berm and evergreen plantings is proposed. The proposed features are expected to be significantly shielded by installation of the berm near the NYS Route 17B right-of-way.

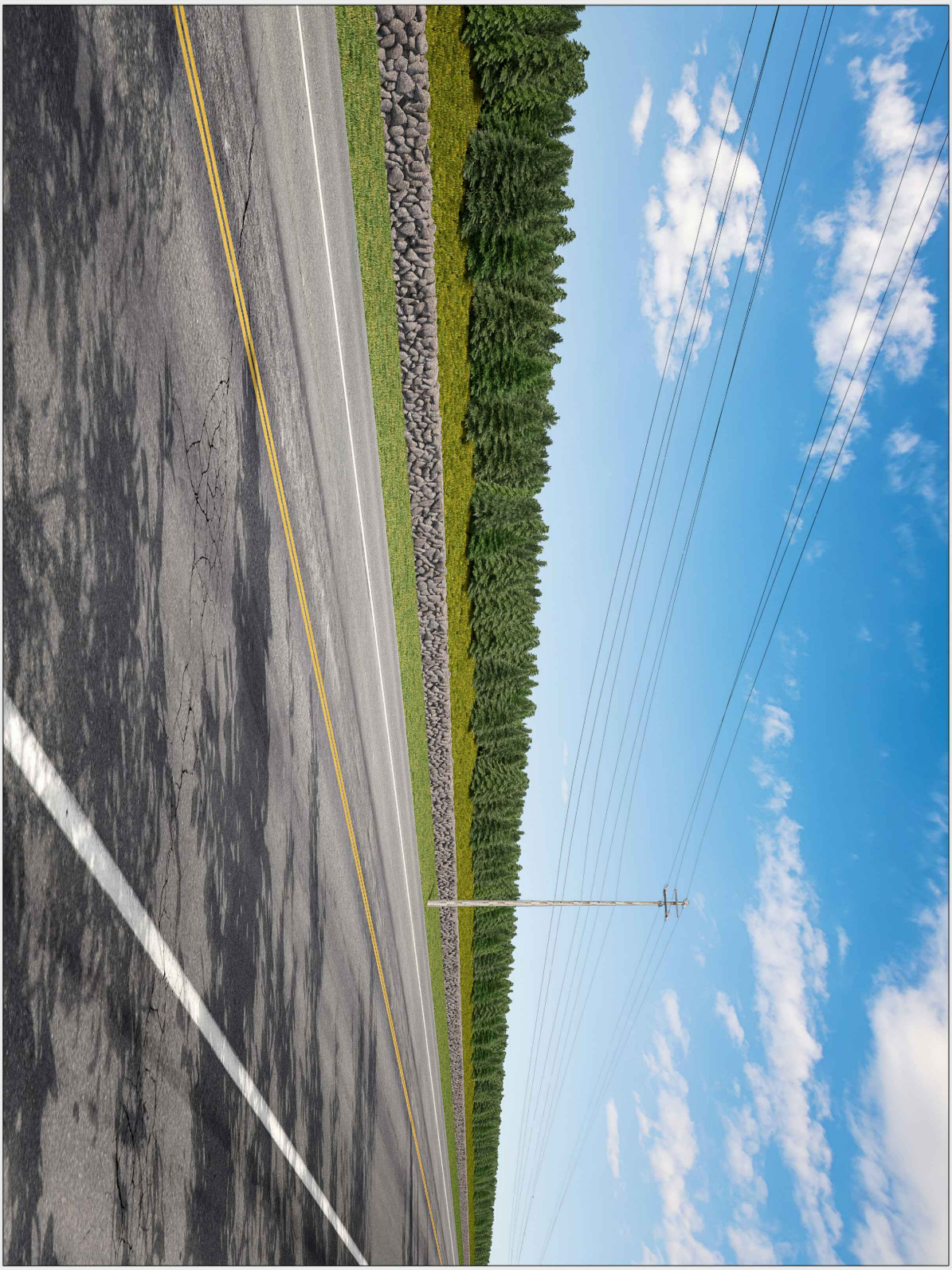
Viewpoint #2: (Figure F-4.5C2) The proposed vehicle storage area and associated stormwater facilities would be visible from this viewpoint. To mitigate this view, a stonewall with berm and evergreen plantings is proposed. The proposed features are expected to be significantly shielded by installation of the berm near the NYS Route 17B right-of-way.

Viewpoint #3: (Figure F-4.5C3) The proposed vehicle storage area and associated stormwater facilities would be visible from this viewpoint. To mitigate this view, a stonewall with berm and evergreen plantings is proposed. The proposed features are expected to be significantly shielded by installation of the berm near the NYS Route 17B right-of-way.

Viewpoint #4: The proposed vehicle storage area and associated stormwater facilities will be located beyond a 100-foot undisturbed buffer of trees. The proposed features are expected to be significantly shielded by preservation of this existing wooded area.

Viewpoint #5: The proposed vehicle storage area and associated stormwater facilities will be located beyond a 100-foot undisturbed buffer of trees. The proposed features are expected to be significantly shielded by preservation of this existing wooded area.

POINT OF VIEW #1



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VIEWSHED #1 RENDERING	BBIS AUTO AUCTION NYS ROUTE 17B TOWN OF THOMPSON SULLIVAN COUNTY, NEW YORK	DATE: 09/15/20	JOB # 1225.03	ENGINEERING & SURVEYING PROPERTIES Achieving Successful Results with Innovative Designs
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POINT OF VIEW #2

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POINT OF VIEW #3

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4.5.3 Aesthetics Resource Mitigation Measures

The proposed project will not significantly alter the aesthetic character of surrounding area within the Town, as the proposed Project is consistent with adjacent land uses to the east. The project will incorporate a large berm with evergreen plantings to shield views from the south along NYS Route 17B where existing mature woods do not exist as natural screening. The cross sections of Viewpoints 1-3 show a proposed decorative stone wall and berm along with proposed landscape trees. The proposed landscaping will create a visually pleasing view shielding the proposed vehicle storage areas and stormwater ponds from the viewpoints along NYS Route 17B.

4.5.4 Aesthetic Resources Conclusion

With the preservation of wooded buffers and installation of a stone wall and landscaped berm, any adverse environmental impacts to aesthetic resources resulting from the construction of the Proposed Action will be mitigated so that impacts will not be significant.

4.6 Potential Impact on Transportation

The engineering and consulting firm Creighton Manning prepared a Traffic Impact Study (TIS) for the Proposed Action. The purpose of the study was to evaluate the existing road network and intersections in the immediate vicinity of the Project Site. The study considered the potential impacts the Proposed Action may have on the current transportation system. The complete Traffic Impact Study is included as Appendix F.

4.6.1 Existing Conditions

ROADWAYS

The current operating conditions of the surrounding road network were determined by analyzing the existing roadways in the vicinity of the Project Site. The studied road network surrounding the Project Site included NYS Route 17B, Kaufman Road (County Road 59) and Benmosche Road.

NYS Route 17B – NYS Route 17B is a rural minor arterial under the jurisdiction of New York State Department of Transportation (NYSDOT). Located entirely in Sullivan County, the roadway runs generally east to west connecting the Hamlet of Callicoon at its western limit and the Village of Monticello at its eastern limit. Approaching the project location from the east, i.e. from NYS Route 17, NYS Route 17B is a multi-lane highway providing one 12-foot lane with 10-foot shoulders in each direction and has a posted speed limit of 45 miles per hour. Approaching the project location from the west, NYS Route 17B is a two-lane highway providing one 12-foot lane in each direction with 10-foot shoulders, a two-way-left-turn lane, and has a posted speed limit of 55 miles per hour. In the vicinity of the project, the land uses along NYS Route 17B are a mix of commercial and residential. Sidewalks are not provided along the roadway.

Kaufman Road (County Road 59) – Kaufman Road is a local road under the jurisdiction of Sullivan County. The roadway runs north to south connecting Benmosche Road at is northern limit with NYS Route 17B at its southern limit. Kaufman Road provides one 11-foot lane with 4-foot shoulders in each direction. Left-turn lanes are not provided along the roadway. Land uses along Kaufman Road are predominantly residential on its northern sections while becoming more commercial and undeveloped on its southern section. There is no posted speed limit; therefore, the speed limit is assumed 55 miles per hour for this study. No sidewalks are provided along the roadway.

Benmosche Road – Benmosche Road is a local road under the jurisdiction of the Town of Thompson. The roadway runs along the west side of NYS Route 17 from Rapp Road at its northern limit until it intersects NYS Route 17 as an on-ramp. Benmosche Road provides one 11-foot lane with variable shoulders in each direction. Left turn lanes are not provided along the roadway. Land along Benmosche Road is predominantly undeveloped with intermittent access to residential developments. There is no posted speed limit; therefore, the speed limit is assumed 55 miles per hour for this study. No sidewalks are provided along the roadway.

STUDIED INTERSECTIONS

There are two intersections studied in the traffic report, which are listed and described below.

NYS Route 17B and Kaufman Road (County Road 59) -

This is a three-way unsignalized intersection operating with stop control on the southbound Kaufman Road approach. The southbound Kaufman Road approach provides one shared lane for left and right turns. The eastbound approach of NYS Route 17B provides one through lane and one exclusive left-turn lane. The westbound approach of NYS Route

17B provides one through lane and one exclusive right-turn lane. It should be noted that CM is aware that drivers sometimes utilize the exclusive right-turn lane for through movements, presenting a conflict as there is only one lane to receive the westbound through movement. CM provides traffic control recommendations herein to improve this condition.

Kaufman Road (County Road 59) and Benmosche Road -

This is a three-way unsignalized intersection operating with stop control on the northbound Kaufman Road approach. The northbound Kaufman Road approach provides one shared lane for left and right turns. The eastbound Benmosche Road approach provides one shared lane for through and right turn movements. The eastern leg of the intersection is a one-way roadway providing access to eastbound NYS Route 17.

Due to the current COVID-19 pandemic, movement counts at the intersections were not conducted as the counts would not be representative of normal operating conditions. To overcome this, data from a analytics data company, Streetlight Data was used for the weekday morning peak period from 7:00 to 9:00 a.m. and weekday evening peak period from 4:00 to 6:00 p.m. and the Saturday midday peak period 11:00 am to 3:00 p.m. in the month of July 2019. These periods coincide with peak operating conditions of the proposed development, as well as adjacent street traffic.

2019 EXISTING TRAFFIC VOLUMES

Traffic operating conditions and level-of-service (LOS) were calculated for the studied intersections based on the Highway Capacity Manual (HCM) methodologies. LOS is reported on an “A” through “F” scale, where Levels “A” through “E” are generally acceptable conditions, and Level “F” describes an unacceptable condition. The LOS is based on the amount of control delay, or increased time of travel, a vehicle experiences approaching and passing through an intersection.

A LOS was calculated for each intersection approach, which were found to be a “B” or better under existing traffic volume conditions. Table 4.6A lists each existing intersection approach LOS determined by the Traffic Impact Study.

Table 4.6A – Studied Intersections – 2019 Existing Level of Service (LOS)		
INTERSECTION	**LEVEL OF SERVICE**	
	AM PEAK	**PM PEAK**
NYS Route 17B/Kaufman Road (Signalized)		
NYS Route 17B - East Bound	A	A
Kaufman Road - South Bound	B	B
Kaufman Road/Benmosche Road (Unsignalized)		
Kaufman Road - North Bound	A	B

4.6.2 Potential Impact on Transportation Resources

Access to the Site will be provided by one unsignalized, full movement driveway on Kaufman Road. The driveway will be located approximately 1,700 feet north of NYS Route 17B and will provide access using a 30-foot wide private driveway. This driveway will accommodate both passenger vehicles, flat-bed car carriers and tractor trailer car carriers.

Available intersections and stopping sight distances were measured for the proposed driveways and compared to recommended NYSDOT design guidance and guidelines found in *A Policy on Geometric Design of Highways and Streets, 2011* published by the American Association of State Highway Transportation Officials (AASHTO). It was determined that the driveway has adequate intersection and stopping sight distance however some clearing of vegetation maybe necessary.

2022 NO-BUILD TRAFFIC VOLUMES

To evaluate the potential impact of the proposed development on transportation resources, traffic projections were prepared for the year 2022, the expected year of Project

completion. To forecast the 2022 traffic volumes, a 1% growth rate was applied to the 2019 existing traffic volumes and compounded annually for three years.

The 2022 No-Build traffic volumes represent the forecasted traffic volumes in the future without the Proposed Project. A LOS was again calculated for each intersection approach, which were found to be LOS "B" or better. Table 4.6B lists the LOS determined for the No-Build condition by the Traffic Impact Study for each intersection approach.

2022 BUILD TRAFFIC VOLUMES

The Site-generated traffic attributable to the Proposed Project would normally be determined based upon the trip generation rates contained in the Institute of Transportation Engineers' (ITE) report entitled, "Trip Generation", Tenth Edition. Upon review of the *Trip Generation Manual*, the traffic consultant concluded that the proposed project is not represented by the land uses studied by the ITE. Therefore, trip generation rates were developed according to the anticipated operations of the auto auction and site-specific data from other auto auction facilities operated by the Applicant.

Traffic generated by the Proposed Project was distributed to the adjacent roadways based on existing observed travel patterns in the project area and the probable travel routes of truck drivers and employees. The proximity of the Site to NYS Route 17 are expected to influence the trip-making behavior of vehicle operators. The site-generated trips were then added to the 2022 No-Build traffic volumes, resulting in the 2022 Build traffic volumes and a LOS was determined for each intersection approach. For the build condition, the LOS were found to be LOS "C" or better. Table 4.6B lists LOS determined by the Traffic Impact Study for each intersection approach.

Table 4.6B – Studied Intersections – 2022 Future Level of Service (LOS)				
INTERSECTION	**LEVEL OF SERVICE**			
	2022 NO-BUILD		**2022 BUILD**	
	AM PEAK	**PM PEAK**	**AM PEAK**	**PM PEAK**
NYS Route 17B/Kaufman Road (Signalized)				
NYS Route 17B - East Bound	A	A	A	A
Kaufman Road - South Bound	B	B	B	C
Kaufman Road/Benmosche (Unsignalized)				
Kaufman Road – North Bound	A	A	B	B
Kaufman Road/Site Entrance-Office Driveway (Unsignalized)				
Site Driveway - East Bound	-	-	B	A
Kaufman Road - North Bound	-	-	A	A

4.6.3 Transportation Resources Mitigation Measures

Based on the potential impacts expected to result from the Proposed Action, operating conditions at each of the studied intersections are not expected to be impacted. To improve Traffic flow at the intersection of NYS Route 17B and Kaufman additional signage is proposed to alert drivers that the right lane is a dedicated turn lane at the intersection with no through movement permitted. Additionally, at the Kaufman Road/Benmosche Road Intersection it is recommended that the shoulder area be reinforced to better facilitate right turning movements of car carriers that are headed onto the east bound NYS Route 17 on-ramp. Finally, it is recommended that a directional sign be placed opposite the site driveway along Kaufman road to direct exiting drivers traveling to NYS Route 17 East to make a left turn onto Kaufman Road.

4.6.4 Transportation Resource Conclusion

The site is expected to generate 34 trips during the weekday AM and PM peak hours. Although the Proposed Action will slightly increase the number of vehicles travelling on the

surrounding roadways, the increase will not adversely impact any of the studied roadway or intersections. The recommended mitigation measures proposed will further improve traffic flow on local roadways.

4.7 Potential Impacts on Environmental Health

4.7.1 Existing Conditions

As the Site is currently vacant, there are no existing contaminant sources on the property. The existing abandon residence and the existing abandon commercial building will be razed and all fuel tanks and building materials will be disposed of in accordance with NYSDEC and Town of Thompson requirements.

4.7.2 Potential Impacts on Environmental Health

The Proposed Action requires the storage of vehicles, including fleet vehicles, repossessed vehicles, flood damaged vehicles, and vehicles that were damaged in an accident. Damaged vehicles that are delivered to the site have the potential to contaminate ground and surface water if fluid leaks are not identified and repaired, and any spills are not properly cleaned.

4.7.3 Environmental Health Mitigation Measures

Damaged vehicles create the greatest potential for environmental health hazards. To ensure that potential environmental health hazards are addressed the following protocols are used:

1. Damage vehicles are initially picked up by the towing company and brought to independent service shops where they are assessed and processed. During this inspection, it is expected that the independent service shops address leaking fluids before delivery to the storage facility site.
2. Vehicles are then loaded on a car carrier and brought to the site where the delivery is limited to the vehicle drop area. Before vehicles can be off-loaded, they are inspected by the site staff for fluid leaks. For any vehicle that is discharging fluid, the leak is immediately fixed, and any spill is cleaned in

accordance with the *Facility Operators Program Manual* (FOPM) attached in Appendix G.

3. Once onsite in the drop area, vehicles are brought inside for inventory and photos where they are again inspected for fluid spills. If a leak is found the vehicle leak is fixed immediately. If the leak cannot be fixed the vehicle is emptied of all fluid.
4. As the drop area has the highest likelihood of an accidental leakage of fluids this area is inspected daily. In the unlikely event that spillage or leakage were to occur, trained operators remediate the spillage immediately in accordance with the FOPM.
5. Once inspected, photographed and inventoried, vehicles are brought to the vehicle storage area via loader where they are stored in the order that they arrive at the site. Storage of vehicles is typically no longer than 90 days while they are waiting to be retitled. The vehicle storage area is inspected on a regular basis where site staff review the conditions of the vehicles and the area surrounding to identify if any leakage has materialized. Once stored onsite, leaks are a rare occurrence, however in the rare situation that one occurs, the staff will address the clean-up by following the procedures and guidelines within FOPM.
6. Once retitled, vehicles are auctioned online daily and once weekly on site. Vehicles being auctioned are brought to the load out area. Cars in the load out maybe inspected by registered bidders and are picked up on car carriers by individual purchasers. Once the vehicles are removed, the area is checked for any fluid leaks.

4.7.4 Environmental Health Conclusion

With conformance to the protocols outlined above and the attached Facility Operators Spill Manual in Appendix G, the potential for impact to Environmental Health will be mitigated so that impacts will not be significant.

4.8 Consistency with Community Plans

4.8.1 Existing Conditions

Community plans include adopted comprehensive plans and zoning codes.

LAND USE & ZONING

Current uses surrounding the property include a mix of undeveloped woodlands, commercial and residential uses. According to the Town of Thompson Zoning Map, the Proposed Action is located within the CI Commercial Industrial zoning district. The CI zone permits the following uses by special use permit:

- Bed-and-Breakfast and Inns
- Summer camps, bungalow colonies, and campgrounds
- Commercial recreational facilities
- Retail and service stores
- Eating and drinking establishments
- Funeral home
- Motor vehicle service stations and public garages
- Hotels and motels
- Public utility structures and rights-of-way
- Manufacturing and processing activities
- Warehouses and trucking terminals
- Junkyards, or salvage yards
- Bus station
- Large-scale solar energy systems

The Town of Thompson Comprehensive Plan was prepared as a guide for growth in the Town of Thompson and Village of Monticello. The Comprehensive Plan dated 1999 incorporates new planning concepts and land use activities that have emerged since the prior revision. The Comprehensive Plan lists a series of goals and objectives that provide a vision to best preserve the character of the community while also responding to emerging trends.

Economic development is one of the goals of the Comprehensive Plan, which is discussed in Chapter 3.0. In addition, Chapter 2.4.2 includes specific recommendations for the Raceway Regional Center that state "Zone the area along Kaufman Road to the west of the Raceway for light manufacturing and wholesale uses which require convenient interstate highway access but not high visibility and do not conflict with the primary tourist-related uses." The Proposed Action is also consistent with the Sullivan County Comprehensive Plan since the County Plan expresses similar goals as the Town's Plan. In addition, the 2020 County Plan Chapter V - Economic Development includes the goal of encouraging the diversification of Sullivan County's economic base.

4.8.2 Potential Impacts on Community Plans

LAND USE & ZONING

The Project is consistent with all bulk requirements for the proposed use of Junkyard or Salvage Yards in the CI zoning district. The following special conditions listed in Section 250-35 will be met as part of the plans and/or permit application:

(1) Condition: *The permittee shall personally manage or be responsible for the management of the junkyard or salvage yard.*

Response: The permittee will be the entity responsible for management of the facility.

(2) Condition: *The permittee shall maintain an office and a sufficient number of employees on the premises to assure the proper and safe conduct of such activity or business, to minimize the hazards from fire, leakage, seepage or bodily injury therefrom, and to prevent trespass thereon by children and others.*

Response: A 8,275 square-foot building is proposed onsite that will contain an office for site operations. Approximately 20 personnel will be employed to ensure safe operation of the facility

(3) Condition: *The permittee must erect and maintain a solid opaque fence, at least six feet in height, of metal or wood, sufficient to screen any view of the operation from adjacent properties or public roads and to secure the property against the entrance of children or others into the area of the operation. All materials related to the operation shall be kept within such fence at all times. If abutting a public road, such fence shall be located at least 25 feet from the street line thereof.*

Response: A six-foot high chain link fence with privacy slats is proposed around the entire operation. All vehicles will be kept inside the fence. The fence will be setback a minimum of 100 feet from the public road right-of-way.

(4) Condition: *Inside and adjacent to and contiguous with such fence, a strip of land at least 10 feet in width shall be kept free of all dry grass or other vegetation or combustible material so as to provide a fire lane around the entire operation.*

Response: The surface will be asphalt millings. A note stating the above is included on the plan sheet O-100.

(5) Condition: *The autos, parts and materials involved in the operation shall be disassembled or dismantled by means other than by burning. They shall be piled or arranged in neat rows so as to permit easy passage and clear visibility through the area.*

Response: There will be no dismantling of vehicles at the site.

(6) Condition: *The operation shall be supervised by the permittee or his employee during business hours. At all other times the premises shall be locked at a secure gate in the fence and in a secure manner.*

Response: There will be an onsite staff of approximately 20 people who will supervise the operation. At all other times, the vehicle storage areas will be locked and secured.

(7) Condition: *There shall be maintained at each operation for which a permit is issued at least one fire extinguisher of approved design and capacity for each 40,000 square feet of area. Each such fire extinguisher shall be hung or mounted in a conspicuous place and shall be clearly marked and available for use.*

Response: A note regarding maintaining fire extinguishers on site has been added to the cover sheet O-100.

(8) Condition: *Suitable sanitary facilities shall be available, connected to approved public sewers or on-site sewage treatment facilities, for the use and convenience of the employees of the permittee as well as the general public visiting the area.*

Response: Sanitary facilities and a septic system are incorporated into the design.

(9) Condition: *The burning of any waste material is prohibited.*

Response: There will be no waste material kept onsite and therefore no burning of waste material.

(10) Condition: *No material may be stored or kept in a junkyard or salvage yard that is flammable, combustible, explosive, reactive, corrosive or toxic to humans as defined and quantified in United States Environmental Protection Agency regulations under 40 CFR 116.*

Response: No material is proposed to be stored in the yard. The only storage will be for vehicles.

One potential impact that may result from permitting the proposed use that could be inconsistent with the Town of Thompson / Village of Monticello Comprehensive Plan recommendations is the Site's visibility from NYS Route 17B. Since NYS Route 17B is the route tourists use to access western Sullivan County and Bethel Woods Center for the Arts visibility of the proposed use is a concern. While most of the site is wooded, portions of the site contain abandon farm fields without significant mature trees to act as a natural visual buffer.

The Project is consistent with the Sullivan County Comprehensive Plan as it brings a diverse business to the County's economic base.

4.8.3 Consistency with Community Plans Mitigation Methods

LAND USE & ZONING

The Proposed Action complies with the Town of Thompson Zoning Law and will meet all the conditions of the Special Use Permit as outlined above. Additional, to ensure the site is not visible from NYS Route 17B a stone wall and berm will be constructed to visually buffer the site as discussed in detail in Section 4.5.2. The Project will enhance the local economy, provide new job opportunities, and comply with Town and County's Comprehensive Plan recommendations, therefore, no negative impacts from the Project relating to community plans are expected.

4.8.4 Consistency with Community Plans Conclusion

All potential impacts regarding the consistency with community plans for the construction of the Proposed Action have been carefully considered and analyzed. No

significant unfavorable impacts with respect to community plans have been identified. Therefore, the Proposed Action will comply with and be consistent with community plans and goals of the Town of Thompson and Sullivan County.

5.0 Summary of Conclusions

As detailed in Section 4.0, the Proposed Action as designed and with appropriate mitigation measures proposed by the Applicant, is not expected to result in any significant adverse environmental impacts. Thus, in the Applicant's opinion, a determination of non-significance or negative declaration under SEQR is warranted.

6.0 Appendices

Appendix A –SEQRA Documentation

Appendix B – Project Correspondence

Appendix C- Geotechnical Investigation

Appendix D1 –Wetlands Map and Report

Appendix D2 – Stormwater Pollution Prevention Plan

Appendix E – Habitat Assessment

Appendix F – Traffic Impact Study

Appendix G – Facility Operators Spill Manual