

Camp Fimfo Modernization and Improvement Project

Town of Highland, New York Draft Environmental Impact Statement (DEIS) Draft Scoping Document

Name of Project: Camp Fimfo – Modernization and Improvement Project

Applicant: Sun NG Kittatinny RV LLC

Project Location: 3854 NYS Route 97
Town of Highland,
Sullivan County, NY

Tax ID: 25.-1-4.1, 23.-1-6, 25.-1-5.1,
25.-1-5.2, 25.-1-9.2, 25.-1-
9.1, 25.-1-15, 25.-1-4.4, 25.-
1-4.3, 25.-1-4.2, 25.-1-8

SEQRA Classification: Type I

Lead Agency: Town of Highland
Planning Board
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Date of Scope Adoption: XXX

**Camp Fimfo
Modernization and Improvement Project
Town of Highland, New York
Draft Environmental Impact Statement (DEIS)
DRAFT Scope**

This document identifies the issues to be addressed in the Draft Environmental Impact Statement (DEIS) for the proposed Camp Fimfo (the "Project") in the Town of Highland, New York (the "Town"), proposed by Sun NG Kittatinny RV LLC (the "Applicant"). This Scope document contains the items described in 6 NYCRR Part 617.8 (e) (1) through (7). For purposes of this Scope, the term "Project" means the Project and all related implementing actions, such as approvals and permits.

PROPOSED PROJECT

The Applicant and Owner, Sun NG Kittatinny RV LLC, managed by Northgate Resorts and Sun Communities, is seeking site plan and special use permit approval from the Town of Highland Planning Board for improvements to an existing, seasonally-operated Recreational Vehicle (RV) campground (known as the Kittatinny Campgrounds and Canoes – Barryville Base). The campground is located at 3854 NYS Route 97¹ amongst an approximately 235-acre site in the hamlet of Barryville in the Town of Highland, Sullivan County, NY. The Project Site is split zoned between the H-C (Hamlet Commercial) and R-2 (Residential Agricultural) zoning districts.

The campground has been in operation since around 1941 and was acquired by Northgate Resorts in 2020. The RV campground is open April – October, and currently includes 342 camp sites (tent and RV) split into ten distinct areas (e.g., campsites 100s – 1000s) with the majority of campsites (100s – 600s, 1000s) clustered to the west and north of the site, leaving the eastern portion of the property for hiking trails, zipline, and paintball. A welcome center area (that contains check in, office, retail), camp store, maintenance buildings, and a pole barn are located off NYS Route 97. There are three bathhouses² serving the campsites, several storage buildings, and a building used for the office. There are also two existing residences on site. The campground currently operates a canoe livery on the Delaware River. The 900s campground sites (RVs and tents) are located in the river area as well. The 700s and 800s campsites are located west of the overall campground area, west of Dry Brook Road.

¹ Tax parcels 25.-1-4.1, 23.-1-6, 25.-1-5.1, 25.-1-5.2, 25.-1-9.2, 25.-1-9.1, 25.-1-15, 25.-1-4.4, 25.-1-4.3, and 25.-1-4.2 are owned by Sun Ng Barryville RV LLC. Tax parcel 25.-1-8 is owned by related Sun Ng Lot 8 RV LP, 27777 Franklin Rd, Ste. 200, Southfield, MI 48304. No project improvements are proposed for the parcels located west of Dry Brook Rd. (25.-1-15, 25.-1-4.3, 25.-1-4.2) and on the river side farther east (25.-1-6.1, 25.-1-7), which are also owned by the Applicant.

² Bathhouse – Central (200s): serves – portion of 100s, all of 200s, portion of 500s, portion of the 1000s former RV sites on field; Bathhouse – East (300s): serves – all of 300s, 400s, portion of 500s, 1000s; Bathhouse – West (100s): serves – portion of the 100s, all of 600s, all of 900s.

As part of the Proposed Project, 283 tent campsites will be converted to RV campsites, featuring Recreation Vehicle Industry Association (RVIA) certified temporary camping structures. No new campsites will be added, and the overall number of campsites will be reduced from 342 to 339 campsites, with a reduction in occupancy from 2,838 to 2,354 people. With the proposed improvements, several old and underutilized structures would be demolished. The existing welcome center would be replaced with a new building at the same location. The two maintenance buildings would be demolished and replaced with a single new building with laundry facilities (4 washers/4 dryers) in a new location. The camp store use would be converted to a food and beverage facility with snack and limited food preparation only. The bathhouses would continue to provide services for campsites, and the storage buildings would continue to be used for storage. In addition, a new aquatic play area and mini-golf course area would be constructed in the welcome center area for campers only.

As part of the Proposed Project, three accesses will be provided to the main campground area north of NYS Route 97. One access will be provided to the river activities area and campground area south of NYS Route 97. The existing access east of Beaver Brook will also remain providing access to the less developed northeastern area of the campground, north of NYS Route 97. In total, two existing accesses will be removed, including one access north of NYS Route 97 and one south. The Proposed Project includes improvements to the internal traffic circulation, including an improved check-in/out vehicular pattern. A total of 286 parking spaces are proposed, including 120 spaces provided as grass parking, south of NYS Route 97. New gravel pedestrian paths will also be provided.

Improvements are proposed to existing wastewater collection and treatment facilities to modernize them in accordance with current sanitary requirements. In addition, construction of additional septic disposal systems (SSDS) is proposed to accommodate converted tent-to-RV sites and other site improvements (e.g., welcome center building, food and beverage building, maintenance and laundry building, and aquatic area).

Treatment and distribution improvements are proposed to well and water supply infrastructure. No new wells are proposed. The Proposed Project will include construction of new stormwater management facilities; currently, no stormwater management practices exist on the Site. Upgrades will be undertaken to electrical infrastructure, landscaping and fencing and new signage is proposed.

Currently, the campground employs a total of 46 employees (part-time and full-time). With the improvements, Camp Fimfo will result in 89 new full-time equivalent (FTE) jobs.

At this time, the proposed Project requires the approvals and permits identified as follows:

1. Town Planning Board Site Plan, Special Use Permit, and Floodplain Permit
2. Upper Delaware Council and National Park Service Substantial Conformance Review - Completed
3. NYS Department of Environmental Conservation SPDES Individual permit for wastewater and SPDES General Permit for stormwater
4. NYS Department of Health for wastewater, water treatment design, campgrounds, swimming pools
5. NYS Department of Transportation for SR 97 modifications
6. NYS Office of Parks, Recreation and Historic Preservation for archeological and historic resource consultation
7. Sullivan County Department of Planning and Development GML 239
8. Sullivan County Industrial Development Agency Payment in lieu of Taxes (PILOT)
9. Delaware River Basin Commission for floodplain management and sanitary design

ORGANIZATION AND CONTENT OF THE DEIS

The DEIS will contain the following information and address the following issues as they relate to the proposed Project.

I. COVER SHEET, TABLE OF CONTENTS, EXECUTIVE SUMMARY

A. Cover Sheet

1. The name of the Project and its location.
2. The name, address, email and telephone number of the Lead Agency and contact person.
3. The name, address, email and telephone number of the primary DEIS preparer and other consultants that contributed to the DEIS; the date of DEIS submission and acceptance.
4. The name, address, email and telephone number of the Applicant/Owner.
5. The date the DEIS is deemed complete.
6. DEIS Public hearing date and public comment period; and

7. Website where the DEIS and Final Environmental Impact Statement (FEIS) will be posted.

B. Table of Contents

C. Executive Summary

1. Introduction
2. Description of the proposed Project.
3. List of all involved and interested agencies.
4. Statement of Project purpose and need.
5. Summary of significant adverse environmental impacts identified in each subject area.
6. Summary of mitigation measure proposed for significant adverse environmental impacts; and
7. Description of alternatives analyzed and a comparison with the Proposed Project.

II. DESCRIPTION OF THE PROPOSED PROJECT

A. Description of Project Site

1. Description of the site location, including acreage; zoning and tax map designations; frontage and access.
2. Description of existing topography and natural resources, including aquatic resources.
3. Description of site location within Delaware River Recreational Segment as described in the Delaware River Management Plan, Land and Water Use Guidelines.
4. Describe the nature and location of any known covenants and easements on the Project Site.
5. Description of on- and off-site utilities serving the Project Site.
6. Description of all existing uses and structures, currently on the Project Site, including buildings or other facilities to be removed or retained, and their current physical condition.
7. Discussion of Project Site history, including prior improvements.

B. Description of the Proposed Project

1. Total number of campsites
2. Seasonal operation

- a. Campground
- b. Canoe Livery
3. Campsite overnight accommodation upgrades
 - a. Tent campsites
 - b. Recreational Vehicle (RV) campsites
 - (1) RVIA certified units
4. Welcome center
 - a. Demolition of one existing building
 - b. New construction of one building
5. Maintenance building
 - a. Demolition of two buildings
 - b. New construction of one building
6. Camp store conversion
7. Canoe livery operations
8. Aquatic center
 - a. Building components
 - b. Mechanical components
9. Mini golf
10. Other new recreational components
 - a. Bouncing pillow
 - b. Upgrades to playground
 - c. New sport courts
11. Parking improvements
12. Lighting improvements
13. Landscaping improvements
14. Pedestrian improvements
15. Impervious reduction/demolition of other ancillary structures
16. Sanitary wastewater improvements
17. Water system improvements
18. Stormwater system improvements
19. Electrical system improvements

20. Solid waste collection improvements
21. On-site roadway improvements
 - a. Emergency access
22. Off-site access and roadway improvements
 - a. Pedestrian ahead signage
23. Anticipated tree removal
24. Anticipated excavation
25. Construction
 - a. Description of construction sequencing.
 - b. Discussion of emergency access and provisions for emergency service during construction.
 - c. Identify temporary parking area for construction workers, and hours of construction activity.
 - d. Identify rock removal methods, including blasting, as applicable.
26. Project Purpose and Need
 - a. Discussion of Project purpose and need, including data and/or demographic market trends and identified demand for a project of this type and target audience.
 - b. Discussion of objectives of the Applicant.
 - c. Description of benefits of the proposed Project.

III. EXISTING CONDITIONS, POTENTIAL IMPACTS AS A RESULT OF THE PROPOSED PROJECT AND PROPOSED MITIGATION

- A. Land Use, Zoning and Public Policy
 1. Land Use
 - a. Existing Conditions
 - (2) Description and mapping of current Project Site land use, including current building conditions.
 - (3) Description of any easements or covenants.
 - (4) Description and mapping of land uses adjoining the Project Site.
 - (5) Description of land use compatibility with other uses within radius.

- b. Future without the Proposed Project
 - (1) Description of any known land use changes for the Project Site, which would occur in the future without the proposed Project.
 - (2) Future known and planned projects in the Town of Highland as identified by the Town with the potential to affect the proposed Project.
 - c. Potential Impacts as a result of the Proposed Project
 - (1) Describe the compatibility of the proposed Project with existing land uses in the study area.
 - d. Mitigation
 - (1) Discuss appropriate mitigation measures to reduce identified impacts.
2. Zoning Regulations
- a. Existing Conditions
 - (1) Map and describe zoning districts on the Project Site, including: use, density, bulk and height, and lot and dimensional requirements per Chapter 190 (Zoning) in the Town Code.
 - a. Applicability of Recreational Vehicle definition.
 - b. Applicability of Temporary dwellings definition.
 - c. Describe existing, legal, non-conforming structures.
 - (2) Describe zoning of adjoining parcels.
 - (3) Description of Chapter 190-25, Campgrounds and applicability to the existing use.
 - a. Describe existing, legal, non-conforming setbacks.
 - (4) Description of Section 190-57 Sign regulations and its applicability to the site.
 - (5) Description of Section 190-73 D Standards applicable to special permitted uses.
 - (6) Description of Section 190-73 F Considerations for site plan approval or denial.
 - b. Future without the Proposed Project
 - (1) Discuss the use of the Project Site without the proposed Project.
 - c. Potential Impacts as a result of the Proposed Project

- (1) Discuss compliance applicable zoning regulations for use, density, bulk, and height.
 - a. Discuss compliance with Recreational Vehicle definition.
 - b. Discuss compliance with Temporary dwellings definition.
 - c. Discuss any change to existing, legal, non-conforming structures.
 - (2) Discuss compliance with Chapter 190-25, Campgrounds.
 - a. Describe any change to existing, legal, non-conforming setbacks.
 - (3) Discuss compliance with Section 190-57 Sign regulations.
 - (4) Discuss compliance with Section 190-73 D Standards applicable to special permitted uses.
 - (5) Discuss compliance with Section 190-73 F Considerations for site plan approval or denial.
- d. Proposed Mitigation
- (1) Discuss appropriate mitigation measures to reduce identified impacts.
3. Public Policy
- a. Existing Conditions:
 - (1) Describe local, regional and other applicable public planning and policy documents including, Town of Highland 2012 Comprehensive Plan, Delaware River Management Plan, Land and Water Use Guidelines, Upper Delaware Scenic Byway, and the Sullivan County 2008 Conserving Open Space and Managing Growth including recommendations relevant to the Project Site.
 - b. Future without the Proposed Project
 - (1) Describe any currently pending public policy initiatives that would affect the site or the one-mile study area.
 - c. Potential Impacts as a result of the Proposed Project
 - (1) Discuss compatibility of the proposed Project with planning and public policy documents listed above.
 - (2) Discuss Substantial Conformity findings of Upper Delaware Council (UDC) with regard to the Delaware River Management Plan, Land and Water Use Guidelines.

(3) Discuss Substantial Conformity findings of the National Park Service with regard to the Delaware River Management Plan, Land and Water Use Guidelines.

d. Proposed Mitigation

(1) Discuss appropriate mitigation measures to reduce identified impacts.

B. Community Character/Visual Impacts

1. Existing Conditions

- a. Describe the visual character of the Project Site and the area located within a one-mile radius of the Project Site.
- b. Describe and provide photographs of the appearance of the Project Site.
- c. Describe the surrounding community character including the surrounding residential areas, commercial uses, hunting clubs, canoe liveries, campgrounds, and the Delaware River.
- d. Perform a GIS based visibility analysis assuming the Project is built to identify areas within one, three, and five miles from which the Project Site is visible.
- e. Perform a field visit to publicly accessible areas as determined through consultation with Town to verify Project visibility while simulating Project visibility through a balloon test or similar means.
- f. Take photographs of the Project Site in "leaf-off" conditions from publicly accessible areas as determined through consultation with Town and provide a narrative description of method and findings.

2. Future without the Proposed Project

- a. Provide narrative description of the Project Site in the future condition without the proposed Project.

3. Potential Impacts as a result of the Proposed Project

- a. Provide photographic simulations of the Project during "leaf-off" conditions from areas determined through consultation with Town and describe Proposed Project in context to surroundings.
- b. Discuss the proposed exterior lighting program.
- c. Describe the architectural design of proposed structures.
- d. Describe potential impacts from Proposed Project on publicly accessible areas identified by Town.

4. Proposed Mitigation

- a. Discuss appropriate mitigation measures for identified impacts.

C. Geology – Soils, Topography and Steep Slopes

1. Existing Conditions
 - a. Describe subsurface conditions based on available soil testing and available geotechnical information.
 - b. Describe surface conditions including identification of outcroppings, significant depressions, ridges or other landforms through Site.
 - c. Provide an existing conditions slope map based on a topographic survey.
2. Future without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
3. Potential Impacts as a result of the Proposed Project
 - a. Provide and describe the grading plan.
 - b. Describe potential impacts from site grading with respect to bedrock depth, soil erosion, slope stabilization, rock removal, and tree removal.
 - c. Provide an estimate of cut and fill.
 - d. Discuss rock removal and blasting and/or rock chipping, if any, and on-site rock crushing, if any. Describe plan/protocols, including compliance with relevant standards and laws.
 - e. Describe environmental and sedimentation control measures.
 - f. Provide a soil erosion control plan.
4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.

D. Groundwater Resources and Water Supply

1. Existing Conditions
 - a. Describe subsurface groundwater conditions, including Delaware River Streamflow Zone/New Jersey Coastal Plains Aquifer Sole Source Aquifer.
 - b. Provide depth to water table, yield and water quality data from wells on the subject property.
 - c. Describe existing demand for potable water.
 - d. Describe existing wells.

- e. Describe existing water treatment.
- f. Describe existing water distribution system.
- g. Describe existing permits.
- 2. Future Without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
- 3. Potential Impacts as a result of the Proposed Project
 - a. Discuss potential for encountering or interacting with groundwater resources during construction.
 - b. Describe Project-generated demand for potable water.
 - c. Discuss potential for well interference with neighboring wells.
 - d. Describe proposed water treatment system for existing wells.
 - e. Describe water distribution improvements.
 - f. Describe required permits.
- 4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.
- E. Aquatic Resources and Floodplains
 - 1. Existing Conditions
 - a. Delineate and map existing streams, waterbodies, wetlands and aquatic resource buffers under Federal (United States Army Corps of Engineers), State, and Town jurisdictions.
 - b. Describe and map floodplains on the Project Site.
 - c. Describe existing facility Flood Evacuation Plan.
 - 2. Future without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
 - 3. Potential Impacts as a result of the Proposed Project
 - a. Describe potential impacts to Federal, State and Town regulated aquatic resources and measures to avoid and/or minimize potential impacts.
 - b. Discuss compliance with aquatic resource protection regulations.
 - c. Describe any impacts to floodplains.
 - (1) Describe new development within the floodplain.

- (2) Describe floodproofing and flood protection design and accommodations.
 - (3) Describe potential for Proposed Project to change floodplain elevation.
 - (4) Discuss the status of any required permitting.
 - d. Describe Flood Evacuation Plan with regard to Proposed Project.
 - 4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.
- F. Stormwater Management
- 1. Existing Conditions
 - a. Discuss existing drainage patterns (including regional watershed and on-site drainage) and their relationship to the Project Site.
 - b. Discuss existing stormwater and drainage infrastructure on the site.
 - c. Discuss relevant Town, County and State Stormwater Management and Erosion and Sediment Control regulations.
 - 2. Future without the Proposed Project
 - a. Describe the conditions on the Project Site without the proposed Project.
 - 3. Potential Impacts as a result of the Proposed Project
 - a. Describe the components and function of the proposed drainage system.
 - b. Describe the applicability of the site as a redevelopment project under State regulations.
 - (1) Discuss State water quantity requirements for redevelopment projects with an increase in impervious cover.
 - (2) Discuss Delaware River's 5th order or larger water body classification.
 - (3) Discuss ramifications of detaining 10- and 100-year storm events on the Project Site as opposed to discharging to the Delaware River.
 - c. Discuss the proposed erosion and sediment control plan and material components of the SWPPP.

- d. Discuss the proposed stormwater management (quantity and quality) plan and SWPPP, including "green infrastructure" practices.
 - (1) Discuss State water quality requirements for redevelopment projects with an increase in impervious cover.
 - e. Discuss ownership and maintenance of stormwater management facilities.
 - f. Discuss compliance with relevant Stormwater Management and Erosion and Sediment Control regulations.
4. Proposed Mitigation
- a. Discuss appropriate mitigation measures to reduce identified impacts.
- G. Sanitary Sewage
- 1. Existing Conditions
 - a. Describe existing wastewater generation.
 - b. Describe existing on-site wastewater conveyance and disposal system.
 - c. Describe existing compliance with applicable permits.
 - 2. Future without the Proposed Project
 - a. Describe the conditions on the Project Site without the proposed Project.
 - 3. Potential Impacts as a result of the Proposed Project
 - a. Discuss estimated Project-generated wastewater volume.
 - b. Describe proposed improvements to wastewater distribution and disposal.
 - c. Describe the Proposed Project's compliance with applicable permits.
 - 4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.
- H. Vegetation and Wildlife
- 1. Existing Conditions

- a. Obtain data from the NYSDEP and the USFWS regarding potential Rare, Threatened and Endangered species on and in the vicinity of the site.
 - b. Describe existing NYSDEC significant natural community.
 - c. Discuss potential for regulated species on the Project Site.
 2. Future without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
 3. Potential Impacts as a result of the Proposed Project
 - a. Discuss impacts to regulated species.
 - b. Discuss impacts to NYSDEC significant natural community.
 - c. Discuss Project related tree removal and describe areas of Site impacted and reasons for tree removal.
 - (1) Describe tree clearing timing restrictions, as applicable.
 - (2) Describe any tree removal within 200 feet of Delaware River shoreline.
 - (3) Describe any White Pine tree removal within 300 feet of Delaware River shoreline.
 - (4) Describe any White Pine tree removal within 300 feet of Delaware River shoreline.
 - (5) Describe any White Pine trees greater than 25" diameter at breast height (dbh) removed anywhere on the Site.
 - d. Describe loud construction noise timing, duration, and location.
 - e. Identify required permits.
 - f. Provide agency consultation correspondence.
 4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.
- I. Traffic, Transportation, Pedestrians and Transit
1. Existing Conditions
 - a. Describe the roadway network and local intersections serving the site, including number of lanes, speed limits, sidewalks and crosswalks, and traffic control.
 - b. Discuss existing emergency access.

- c. Qualitatively describe traffic around the site during peak camping times, with consideration of check in/out and canoe livery operations.
 - d. Qualitatively describe traffic and parking conditions at the Route 97 and Route 55 intersection on weekends during operation of the Farmer's Market.
 - (1) Provide estimates for total vendors, volunteers.
 - (2) Consider availability of parking on Route 97 and any disruption to traffic.
 - (3) Assess existing number of parking spaces within funeral home parking lot and traffic circle off River Road.
 - (4) Estimate typical Saturday attendance using a range, if applicable.
 - (5) Discuss peak arrival and departure times.
 - e. Discuss potential solutions to issues identified for the Town to consider.
 - 2. Future Without the Proposed Project
 - a. Discuss planned, proposed or underway traffic improvements.
 - 3. Potential Impacts of the Proposed Project
 - a. Qualitatively discuss the impact of existing site-generated volumes on traffic conditions.
 - b. Discuss implementation of Pedestrian Ahead signs on NYS Route 97 and evaluate pedestrian and bicycle safety conditions.
 - c. Discuss change in Site access and effect on NYS Route 97 operation.
 - d. Discuss internal site vehicular circulation changes, including transient RV entry/exit and check in/out operations.
 - e. Identify the parking requirements based on the Town Code and compare with estimated parking demand and the proposed to be included on the Site.
 - f. Describe any change to canoe livery operations.
 - g. Discuss any change to emergency access.
 - 4. Proposed Mitigation.
 - a. Discuss appropriate mitigation measures to reduce identified impacts.
- J. Community Services

1. Existing Conditions
 - a. Describe available police services.
 - b. Describe available fire and emergency services (EMS).
2. Future without the Proposed Project
 - a. Describe community services available to the Project Site without the proposed Project.
3. Potential Impacts as a result of the Proposed Project
 - a. Discuss potential impacts to police services based upon consultation with provider.
 - b. Discuss potential impacts to fire and EMS services based upon consultation with service providers.
4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.

K. Historic and Cultural Resources

1. Existing Conditions
 - a. Describe eligible and listed resources on the National and State Registers of Historic Places that are on or substantially contiguous to the Site.
2. Future without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
3. Potential Impacts of the Proposed Project
 - a. Describe potential direct and indirect impacts to cultural resources.
 - b. Provide consultation correspondence with the New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP) Cultural Resources Information System (CRIS).
4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to mitigate any identified impacts.

L. Noise

1. Existing Conditions
 - a. Provide a list of sensitive noise receptors within 500 feet of the Project Site.

- b. Describe the Town's Chapter 190-39 Noise standards.
- c. Provide ambient sound readings.
- d. Provide a qualitative description of the existing sound environment.
2. Future Without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
3. Potential Impacts of the Proposed Project
 - a. Qualitatively evaluate temporary construction noise impacts.
 - b. Describe Proposed Project's contribution to ambient sound conditions.
 - c. Describe compliance with Town Chapter 190-39.
4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to mitigate any identified impacts.

IV. ALTERNATIVES

The analysis of reasonable alternatives to the Proposed Project will be based on schematic concept plans, with impacts discussed in accordance with the environmental resource sections described above. The alternatives will include:

- The "No Action" Alternative
- Alternative A - No Aquatic Center and removal of related utility infrastructure

V. SIGNIFICANT ADVERSE IMPACTS THAT CANNOT BE AVOIDED

Identification of those adverse environmental impacts that cannot be avoided or adequately mitigated if the proposed action is implemented.

VI. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Identification of those natural and man-made resources consumed, converted or otherwise made unavailable for future use as a consequence of the Proposed Project.

VII. GROWTH INDUCING ASPECTS

A description and analysis of potential growth-inducing aspects or further development which the proposed action may support or encourage, will be provided and mitigation measures discussed if necessary.

VIII. EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES

A description of the effect of the Proposed Project on the short and long term use and conservation of energy resources will be provided including ways to reduce inefficient or unnecessary consumption during construction and long term operation for the proposed action and all alternatives.

VIII. APPENDICES

- A. SEQRA Notices and Filings
- B. Scoping Document
- C. Agency Correspondence
- D. Traffic Impact Analysis
- E. Stormwater Pollution Prevention Plan (SWPPP)
- F. Cultural Resources Report(s)
- G. Wetland Delineation Report
- H. Protected Species Habitat Report
- I. Others as required