



City of Ithaca
FULL ENVIRONMENTAL ASSESSMENT FORM – Part III
Project Name: Falls Park Apartments, 121-125 Lake Street
Date Created: 11/16/2018, Updated 12/12/18

*** This document is in draft form and will be updated as additional information is provided by the project applicant ***

PROJECT DESCRIPTION

The applicant proposes to build a 133,000 GSF, four story apartment building and associated site improvements on the former Gun Hill Factory site. The 74-unit, age-restricted apartment building will be a mix of one and two bedroom units and will include 7,440 SF of amenity space and 85 parking spaces (20 surface spaces and 65 covered spaces under the building). Site improvements will include an eight foot wide public walkway located within the dedicated open space on adjacent City Property (as required per agreements established between the City and the property owner in 2007) and is to be constructed by the project sponsor. The project site is currently in the New York State Brownfield Cleanup Program (“BCP”). Before site development can occur, the applicant is required to remediate the site based on soil cleanup objectives for restricted residential use. A remedial investigation (“RI”) was recently completed at the site and was submitted to NYSDEC in August 2018. The project is in the R-3a Zoning District and requires multiple variances.

This is a Type I Action under the City of Ithaca Environmental Quality Review Ordinance (“CEQRO”) §176-4 B(1) (h)[2], (k) and (n) and the State Environmental Quality Review Act (“SEQRA”) §617-4 (b) (11), and is subject to environmental review.

IMPACT ON LAND

The 2.37 acre project site is located in a developed urban setting and has been previously disturbed due to historic land use associated with the former Ithaca Gun Factory. The average depth to water on-site is greater than 15-feet, and both soil and water have known contamination due to prior use of the site. Soil and groundwater remediation will be completed as part of project requirements for redevelopment as well as the site’s participation in New York State’s Brownfield Cleanup Program (“BCP”). The site is currently vacant, however the project proposes to return the site to habitable use through remediation and redevelopment. The site will be required to be remediated to restricted residential use soil cleanup objectives due to the proposed use of the site for residential purposes.

Depth to Bedrock

According to a geotechnical report provided by the applicant dated August 24, 2018, bedrock depths are between the site’s surface and 8.5-feet from the surface, however no blasting is proposed to occur as part of development. The geotechnical report proposes conventional shallow foundations to be constructed to bear on stable natural rock or lean concrete to be placed during site preparation work.

Approximately 4,050 tons of rock and unconsolidated materials will be removed from the site (15,000 cubic yards). Ground disturbance will not require blasting and primarily impacts areas that have previously been developed (i.e. concrete foundations, gravel, and some bedrock). A 0.57 acre net increase of roads, buildings and other paved or impervious surfaces is proposed, however the project additionally proposes to increase lawn and landscaping acreage by 0.14 acre. The project will disturb more than one acre of land, requiring a Storm Water Pollution Prevention Plan (“SWPPP”) to be developed and implemented.



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According to the site plan submitted on September 14, 2018 in reference to the above referenced geotechnical report:

“The report recommends conventional shallow foundations bearing on rock for 85% of the building. The allowable bearing pressure provided is 15ksf..... A small area at the northeast portion of the building will require deep foundations due to the rock profile that is steeply sloping and will be much below the standard footing elevations. The footings in those areas will be supported by micropiles or other deep foundation options which have yet to be determined.”

Portions of the building are required to be constructed on steep slopes, as referenced above. These areas will be supported by micropiles which can be installed in soil, rock, cobbles and boulders, through manmade obstructions or in areas of high water table. As described in additional information provided by the project applicant and dated November 27, 2018:

“A micropile is a small diameter (6”-10”) friction pile that is bored or drilled to support axial and lateral loads. Micropiles may be cased or uncased depending on soil conditions. Reinforcement bars placed at the center of the pile and cementitious grout allow for load transfer into the bearing soil or rock.”

Soil Volume Removal

The applicant provided supplemental project information on November 27, 2018, estimating approximately 3,675 cubic yards of material to be removed as part of brownfield remediation efforts. See also section on Impacts to Transportation.

IMPACT ON GEOLOGIC FEATURES

The site is located contiguous to the gorge, which accommodates the Fall Creek (“the Creek”) waterbody to the north, a designated recreational river. Construction and site activities are not proposed to impact this geological feature. Silt logs are proposed to be used for perimeter protection along topographic contours, as identified in the Erosion and Sediment Control Plan (C1.02) dated September 14, 2018. The applicant further proposes to periodically inspect and maintain all control measures during construction, and to clean out sediment when accumulated to 25% of the height of the silt logs. See also section on Impacts to Surface Water.

IMPACT ON SURFACE WATER

As stated in the prior section, the project site is located contiguous to Fall Creek. The applicant proposes to use best practices, identified in the Erosion and Sediment Control Plan (C1.02) dated September 14, 2018, to minimize erosion and sedimentation that may otherwise adversely impact the Creek. Such techniques include installation of silt logs around the project perimeter and placement of filter fabric over stormwater drains until site stabilization occurs. Introduction of turbidity is anticipated to minimal and limited to the period of construction.

Additional information needed

- Need narrative from the SWPPP.



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IMPACT ON GROUNDWATER

The potable water source to support the residential development is not site groundwater, which is known to have pre-existing contamination. The City of Ithaca will supply potable water to the development. According to the applicant's preliminary site plan (dated September 2018):

“Groundwater occurs at depths of approximately 30-feet below grade and within fractures of the underlying bedrock.”

As part of remediation activities on the adjacent city-owned property, three 2-inch bedrock monitoring wells (MW-5, MW-6, and MW-7) were installed to investigate the site. Historic monitoring wells MW-3 and MW-4 were also sampled as part of this effort. Findings from groundwater monitoring activities indicated that site groundwater within the fractured bedrock has been impacted by volatile organic compounds (“VOCs”), particularly trichloroethene (“TCE”), and cis-1,2-dichloroethene. As summarized in the SMP for this portion of the site:

The results appear to indicate the source is to the east emanating from the Former Ithaca Gun Factory site. Impacted groundwater migrates beneath the Western Accessway portion of the site and off-site to the west and northwest. The metals detected are likely attributed to dissolved metals in the groundwater. Future groundwater monitoring will be conducted by the NYSDEC.

Groundwater contours taken from measurements obtained in October 2012 and December 2012 are mapped on Figure 3A and Figure 3B, included in the SMP and provided in **Attachment X**. These contours illustrate groundwater flow, and contaminant migration, off-site to the west and northwest, as described above.

Groundwater is planned to be monitored and treated as part of site remediation, resulting in a net positive impact on groundwater quality for the site. According to the site plan submitted in September 2018, stormwater management is proposed to be addressed on-site, and include a combination of a bioretention filter and hydrodynamic separator units.

Due to the depth of the groundwater, it is unlikely construction and site use will impact groundwater or that exposure to VOC contamination will occur following site remediation.

The applicant is waiting on RIR approval from NYSDEC prior to development of a Remedial Work Plan, which will further identify groundwater monitoring and remediation efforts on the project site.

IMPACT ON FLOODING

The project is not located in the 100 or 500 year floodplain, and will not impact any waterbody that may contribute to flooding. Rainwater from roof areas will be conveyed via rain leaders to ground level. A below grade piping system will collect stormwater at the groundwater and convey water out of the building.

The Lead Agency has determined that based on the information above, no significant impact to flooding is anticipated.



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IMPACTS ON AIR

According to information provided by the applicant, construction is projected to last approximately 20 months. Excavation and preparation of foundations create the potential for increased airborne dust and dirt particles. As part of ERP site investigation on the city-owned parcel, a soil vapor survey was conducted which included sampling of four soil vapor points (SV-01 through SV-4) along the Western Accessway. The results of this survey indicated elevated levels of TCE at SV-01 and SV-02, and other low level VOCs. NYSDEC conducted additional off-site vapor intrusion investigations and based on the results, recommended institutional and engineering controls be enforced to address vapor mitigation in the event of future site redevelopment. The project proposes soil vapor mitigation measures as part of long-term site use.

During remediation and construction activities, air monitoring will be conducted in accordance with the NYSDOH Community Air Monitoring Plan ("CAMP"). In addition, a Health and Safety Plan ("HASP") will be developed and implemented during site remediation activities.

During construction, the applicant will employ the following applicable dust control measures, as appropriate:

- Misting or fog spraying the site to minimize dust;
- Maintaining crushed stone tracking pads at all entrances to the construction site;
- Re-seeding disturbed areas to minimize bare exposed soils;
- Keeping roads clear of dust and debris;
- Requiring trucks to be covered;
- Prohibiting burning of debris on site.

The Lead Agency has determined that with the mitigation measures during and after construction identified above, no significant impact to air is anticipated.

IMPACTS ON PLANTS AND ANIMALS

According to the NYSDEC Environmental Resource Mapper, there are no rare or significant plant or animal communities located on or around the project site. In addition, the Environmental Resource Mapper does not identify any rare plant or animal species on or around the project site. The Northern long-eared bat is a Federally listed threatened species that is known to be located in the northeastern portion of the United States, including portions of New York State. The habitat for this species is generally in forested areas. Given that the project site is located in a predominantly urban area with limited forestation on the project site, it is unlikely the project (i.e., construction activities) will impact this species.

According to supplemental information provided by the applicant on November 27, 2018:

The project site includes removal of approximately seven trees greater than 1.5 inch diameter at breast height (DBH) in addition to areas of scrub that include young volunteer colonies of successional trees. All trees to be removed within the project limits are invasive successional deciduous tree species in fair to poor health. Dominant deciduous tree colonies include: Robinia pseudoacacia (Black Locust), Ailanthus altissima (Tree of heaven) and Acer platanoides (Norway Maple).



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The applicant proposes an increase of approximately 0.14 acre of landscaped areas following site redevelopment. Plantings include deciduous shade trees, multi-stem ornamental trees/shrubs, deciduous shrubs/perennials, and mixed perennials and groundcover plantings. A detailed site planting plan and planting schedule was provided as Figure L4.01 as part of the applicant's site plan submission dated September 2018.

The Lead Agency has determined that based on the information above, no significant impact to plants and animals is anticipated.

IMPACT ON AGRICULTURAL RESOURCES

The project site is located in an urbanized area, and there are no agricultural resources located in proximity to the project site.

The Lead Agency has determined that based on the information above, no significant impact agricultural resources is anticipated.

IMPACT ON AESTHETIC RESOURCES

The project site is visible from the public right-of-way used for routine, multi-modal travel by area residents. The project aims to enhance viewing of scenic resources (i.e., Fall Creek) through construction of a publicly accessible overlook.

For discussion/additional information needed

- **Need a better understanding of how much of the project will be visible from Fall Creek and Cornell Height's Historic District.**

IMPACT ON HISTORIC AND ARCHAEOLOGICAL RESOURCES

The project site is located on an area that has experienced significant prior disturbance. Furthermore, there are no sites, districts or buildings listed or on the State and National Register of Historic Places substantially contiguous to the project site. The site is located in proximity to the Cornell Heights Historic District.

For discussion

- **Need to determine whether or not project will be visible from the Cornell Heights Historic District.**

IMPACT ON OPEN SPACE AND RECREATION

The site is an existing brownfield site with limited public access. The project proposes to enhance public access to Fall Creek by proposing construction of a pathway and overlook.

The Lead Agency has determined that based on the information above, no significant impact open space and recreational resources is anticipated.

For discussion/additional information needed

- **Will the project be visible from Fall Creek (classified as a Wild and Scenic River)**



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IMPACT ON CRITICAL ENVIRONMENTAL AREAS

There are no Critical Environmental Areas located within the City of Ithaca.

The Lead Agency has determined that based on the information above, no significant impact to critical environmental areas is anticipated.

IMPACT ON TRANSPORTATION

According to the site plan submitted September 14, 2018, the project proposes 85 parking spaces to accommodate residents. In addition, the project plans improvements to the existing easterly drive.

A Transportation Impact Study (“TIS”), dated June 13, 2018 and prepared by SRF Associates, was submitted by the applicant. The study includes a sight distance evaluation to identify the required Stopping Sight Distance (“SSD”) and Intersection Sight Distance (“ISD”) for the proposed access drive location. Findings indicate that the available sight distances at the proposed access drive location exceed the required SSD in both directions. The ISD is met to the west of the project site but is deficient to the east of the project site. Community members have expressed some concern regarding how sight distance will be impacted by construction of the retaining wall proposed for the site.

According to the study, the Average Daily Traffic along Lake Street in front of the project site is approximately 3,075 vehicles per day. Estimated site generated traffic during morning peak hours is anticipated to be additional five (5) entering cars and 10 exiting cars. During the evening peak, it is estimated that 11 cars will enter and nine (9) will exit the site.

There will be temporary transportation impacts during the construction period. The project is intended to be constructed in a single phase. According to information provided by the applicant in the September 14, 2018 submission:

“All access to the east parcel will be from Lake Street. Access to the City-owned parcel for construction of the elevated public walkway located within the dedicated open space is anticipated to occur primarily from the east parcel and Lake Street.”

Work located within the City right-of-way that will require street permits from the Engineering Division of the Department of Public Works include: new curbs, asphalt patch, two curb cuts, asphalt driveways, concrete public sidewalk and stairs, handrails, and a small quarry block retaining wall.

Construction vehicles with regional northern and southern points of origin and destination will follow Lake Street west from the redevelopment site, connecting via East Shore Drive to State Route 13 and proceeding northeast towards I-81 (connecting to the interstate at Cortland).”

According to the applicant, an estimated 3,675 cubic yards of material is proposed to be removed as part of remediation efforts. The number of trucks required for soil removal will depend on the moisture content of the soil. Assuming an average of 12 CY per truck, approximately 300 trucks are anticipated for brownfield soil removals.



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The applicant should provide information about hauling route to remove soils from the site as well as routes and times for construction deliveries. The applicant should also provide information on construction staging.

IMPACT ON ENERGY

The applicant has provided the following information related to on-site energy utilization in the site plan submitted September 14, 2018:

Electrical

The electrical design shall be based on the following:

- *Electric service provided by the local utility company;*
- *Each apartment is separately metered from a utility meter. An unmetered service will be provided for this need. Individual electric meters for each apartment will encourage more accountability among tenants and their energy usage. This will help to increase the overall building efficiency; and*
- *A separate metered electric service for house loads such as common spaces, garage, corridors, stairwells, amenity spaces, and the sort.*

On-Site Power Generation

An on-site power plant will be provided to support the facility in the event of a power outage. The generator will be provided with a weather protective assembly, subbase fuel tank sized to support the facility for 24 hours at full load, and critical silencing type muffler to minimize sound. Loads supported by the generator set includes Emergency Systems, fire pump (if required), and Legally Required Standby Systems. Only one elevator will be powered during utility outage.

Lighting

Lighting throughout the building will be LED fixtures.

Eight Approximately 14-foot high contemporary pole-mounted area lights will be sited around the surface parking area and near the southern entrance driveway to the basement level parking garage to illuminate primary vehicular circulation routes and the general vicinity nearest the surface parking lot. Supplemental low-level path lighting is proposed to be mounted to a cheek wall that runs the length of the primary sidewalk on the east of the building and the west side of the surface parking lot.

Natural Gas

Natural gas is available at the site and will be provided for the two rooftop units and amenity fireplace.

For discussion/additional information needed

- **Need more information related to energy conservation methods and compliance with Tompkins County Energy Recommendations for New Construction.**



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IMPACT ON NOISE, ODOR & LIGHT

According to the site plan review application provided by the applicant, construction will last approximately 20 months. The project is located in an urban, residential area. Noise-producing construction activities will temporarily impact residents in the immediate area. Noise-producing construction activity will be limited to the hours of 7:30 a.m. to 7:30 p.m. Monday through Friday.

Site lighting may cast light onto adjoining properties. The project proposes to incorporate LED light fixtures as the exterior light source. The introduction of site lighting is anticipated to have a small impact on the area, and a final lighting plan will be submitted for site plan review.

For discussion/additional information needed

- **Need to determine light impacts from the building (large area of glass fenestration proposed) to surrounding residential and recreational uses.**

IMPACT ON HUMAN HEALTH

The site is currently undergoing remediation for lead contamination, PAHs, and select VOCs in both the soil and groundwater. Proposed future use is a higher density residential apartment complex. Institutional (e.g., deed restriction) and engineering controls (e.g., soil vapor intrusion mitigation measures) will be required for residential occupancy of the site. Garage ventilation measures are proposed to minimize exposure to vapors. Remediation completed as part of site redevelopment is anticipated to have a net positive impact on human health and minimize exposure to any residual contamination.

Brownfield Site Contamination

The project site includes a 1.63-acre site consisting of two separate parcels: the eastern parcel being the site of the main operations of Ithaca Gun Company, and the smaller, western parcel containing the former boiler. Immediate adjacent to the project site is a parcel that was conveyed to the City of Ithaca (0.95 acre).

City-Owned Property

The City of Ithaca's adjacent property, on which the public walkway will be installed, was remediated through the Environmental Restoration Program ("ERP"). Remediation was completed by the City with NYSDEC and NYSDOH oversight in 2017. At the conclusion of the program, the City was required to establish a NYSDEC approved *Site Management Plan* ("SMP"), outlining required institutional controls as well as required inspections, monitoring, maintenance, and reporting activities as part of plan implementation. An Environmental Easement was granted for the property on December 8, 2016, in accordance to Article 71 Title 36 of the Environmental Conservation Law, and states:

The controlled property may be used for Restricted Residential as described in 6 NYCRR Part 375-1.8(g)(2)(ii), Commercial as described in 6 NYCRR Part 375-1.8(g)(2)(iii) and Industrial as described in 6 NYCRR Part 375-1.8(g)(2)(iv).

Project Site

A Remedial Investigation Report ("RIR") was completed by IFR Development, LLC and is currently under review by the New York State Department of Environmental Conservation ("NYSDEC") in consultation with the New



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York State Department of Health (“NYSDOH”). Based on findings of the investigation, it has been identified that the primary contaminant of concern in surface and subsurface soils is lead, however polycyclic aromatic hydrocarbons (“PAHs”) and polychlorinated biphenyls (“PCBs”) have also been detected in isolated areas and will require cleanup.

According to the August 2018 BCP Fact Sheet prepared by the NYSDEC:

NYSDEC will complete its review, make any necessary revisions and, if appropriate, approve the investigation report. The approved report will then be made available to the public. The applicant may then develop a cleanup plan, called a ‘Remedial Work Plan.’ This plan describes how contamination will be addressed, with NYSDEC and NYSDOH overseeing the work. NYSDEC will present the draft cleanup plan to the public for its review and comment during the 45-day comment period. NYSDEC will keep the public informed throughout the investigation and cleanup of the site.

Waiting on NYSDEC review of RIR

The applicant provided supplemental project information on November 27, 2018, estimating approximately 3,675 cubic yards of material to be removed as part of brownfield remediation efforts.

See also sections on Impacts to Groundwater, and Impacts to Air.

The Lead Agency recognizes that any determination regarding the site remediation, the standard to which clean-up is required for the intended end-use, and the how remediation will be carried out, is under the jurisdiction of NYSDEC and the NYS Department of Health. This project cannot be implemented until NYSDEC and NYSDOH determine that the site has been remediated to the required standard for the proposed use.

CONSISTENCY WITH COMMUNITY PLANS

The project requires several variances due deficient yard setbacks that result from a portion of the original property being dedicated to the City as open space. The project is located in an urbanized area and located in proximity to other higher density residential uses, and supports the Comprehensive Plan by providing affordable housing. In addition, the project intends to enhance and protect environmental quality through site remediation.

According to additional information provided by the applicant, project sewer loads are anticipated to be 11,340 gallons per day. In a letter dated November 27, 2018, the city engineer indicated that they ran the demand scenario in their water model, and the results confirmed that there is more than adequate capacity in the existing downstream sewer system and water distribution system to support the proposed development.

The Lead Agency has determined that based on the information above, no significant impact to community plans is anticipated.



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CONSISTENCY WITH COMMUNITY CHARACTER

The site at 121-125 Lake Street is currently vacant, and the project proposes to construct a 133,000 square foot structure on-site. Although this is in contrast to existing conditions, historically the site was used for industrial purposes and supported structures comparable to that proposed. The proposed residential development is in an area of the City that has historic and emerging residential uses. The project does not propose to replace any facilities or areas of historic importance to the community. The architectural scale and character of the proposed development is anticipated to have a small impact, and will be addressed and mitigated throughout the site plan review process.

- Need description from applicant of proposed building and site materials.

Prepared by: Lisa Nicholas, AICP, and revised by the Planning Board

DRAFT