Comments and Recommendations

Prepared by the City of Cortland Environmental Advisory Committee

In re:

The Proposed SUNY Cortland Student Life Center (SLC) Draft Environmental Impact Statement (DEIS)

May 7, 2012

Introduction:

The Environmental Advisory Committee of the City of Cortland has done an assessment of the SLC DEIS released for public review on April 12, 2012. We commend the project sponsors for their attention to the concerns of the city regarding aquifer protection, flooding and stormwater management. However, our analysis has revealed a number of design, process and siting deficiencies related to the development of this project. These will be addressed in the ensuing commentary, which includes both questions and recommendations for modifications and improvements. It is our hope that SUNY, the City and neighborhood residents will be able to resolve the controversy surrounding this project in a way that will be satisfactory and accommodating to all parties.

DEIS, §1.0, page 5: "In summary, the alternatives analysis concluded that the Project as proposed offers meets (sic) the Programming goals of the Project sponsor with the fewest potential adverse impacts."

This committee believes that alternative sites for the project were dismissed by the DEIS without sufficient consideration. The apparent resolve of the project sponsors to build the SLC according to this particular plan and on the selected site fails to adequately address the legitimate concerns of neighborhood residents, especially when other, more community-friendly options are readily available that would satisfy the perceived needs of the college. Absent more detailed, clearly stated and compelling arguments against an alternative site, it appears that project sponsors have chosen to mitigate a significant impact to the surrounding neighborhood environment, rather than eliminate it.

Example: The New Student Life Center Comprehensive Program Study of March 9, 2010 illustrates several design alternatives located on approximately the same site. On page 10 of that study is a diagram of Alternate # 1, a three-story SLC with a considerably smaller footprint. This committee submits that this design would be far more acceptable to community residents with the following modifications:

- Move the building west adjacent to or abutting the Lusk Field House
- Reconfigure the north wing of the design to wrap around the north side of the field house

This alternative would provide the following benefits to the community, with no reduction of utility to the college:

- A 30%+ smaller footprint, increasing the amount of green space and pervious surface for aquifer recharge
- A much broader buffer zone between the SLC and the Pearl/Warren/York Streets neighborhood to the east, reducing the impact of noise, odors, pedestrian traffic and light pollution
- A more distant building profile (from the east) and effectively lower horizon, reducing visual impact on neighboring properties and allowing residents a less impeded western panorama

Example: In the Executive Summary on page 2 of the same study, several diagrams illustrate the long-range plan concept for that entire area of the campus. The diagrams show the relocation of Wallace Field to the west of the Park Center and the complete dismantling of the Lusk Field House. Any of the proposed SLC designs utilizing the space vacated by the removal of either or both of those two facilities would be far more acceptable to the community and still more than adequate to the perceived needs of the college.

Four other alternative sites were considered by the SUNY Design Team and were rejected based on the outcome of their scores on what seems to be a subjective design

matrix, thus reinforcing the perception that the site that was chosen was a foregone conclusion. It should be noted that the Design Team never included any city officials or neighborhood representatives, and that at no time during the design process were members of the public involved or consulted.

This committee rejects the finding of the DEIS that no satisfactory alternatives are available.

3.0 Existing Conditions, Potential Impacts and Mitigation Measures

§3.1 Geology, Soils and Topography

§3.1.2.1: "Following construction, approximately 2.8 acres will be restored to lawn/landscaping while the remaining 5.7 acres will consist of pavements and the building footprint."

Utilizing either of the alternative examples outlined above would result in less disturbance of presently pervious surfaces; the first example has a smaller building footprint, the second example incorporates surfaces that are already impervious and could simply swap one building for another.

§3.1.2.2: "…the Project site has been disturbed/developed for decades, and currently contains approximately 4.2 acres of pavement and impervious surfaces."

This characterization of the site is misleading; the project site consists almost entirely of Davis Field, open green space that is neither paved nor impervious and, while technically "developed," is quite different from a building and generally seen as a positive landscape element.

§3.2 Water Resources

§3.2.2.1: "…assuming proper implementation of sediment and erosion control measures, no adverse indirect impacts to surface [sic. ground and storm] waters are anticipated as a result of the Project."

What mechanisms will be in place to ensure that such measures will be observed and enforced?

§3.2.3: Proposed Mitigation

Any and all "proposed" mitigation measures related to water resources during both the construction and operational phases must be adopted.

The use of non-organic chemical fertilizers, pesticides, herbicides and fungicides must be prohibited.

Spill prevention and mitigation: Storage of paints and other coatings must be in sealed containers and under cover from exposure to the weather. No on-site discharge or washout of materials from construction or service vehicles can be permitted.

§3.3 Climate, Air Quality and Odor

§3.3.3: Proposed Mitigation "A dust control program will be implemented as necessary to control fugitive dust during construction. Control measures will include the application of mulch, water, stone, or approved chemical agent on public roads, access roads, exposed soils, or stockpiled soils when dry and windy conditions exist…Typically only plain water will be used for dust suppression; chemical dust suppressants will be used only in situations where plain-water dust suppression is not effective."

What kind of chemical suppressant(s) will be used for dust control? Are such chemicals approved for safe use in close proximity to a sole-source aquifer?

§3.6 Aesthetic/Visual Resources

§3.6.1.1 Visual Study Area, ¶ 4: "The mostly forested lands adjacent to Otter Creek, including the property located immediately north of the Project site, are designated by the Water Board for the City of Cortland as a Critical Environmental Area due to their occurrence over the Otter Creek/Dry Creek aquifer."

This sentence neglects to mention that **the entire project site** is now designated as a CEA since its inclusion in the recently enacted City of Cortland Wellhead Protection Zoning Overlay District.

§3.6.2.2.2 Visual Simulations, ¶ 3: "…the scale, mass, and form of the proposed building result(s) in a significant change compared to the existing views of open space (Davis Field) available from areas east/southeast of and immediately adjacent to the Project site. From these areas, the Student Life Center is a dominant feature in the view and obstructs visibility of vegetation and other landscape features located north and west of the Project site."

This passage speaks for itself.

§3.6.3 Proposed Mitigation: "The only visually sensitive site (as defined per the NYSDEC) with potential views of the Project is the Cortland Rural Cemetery…"

In spite of the DEC's definition of what is or is not "visually sensitive," it is abundantly clear that neighborhood residents consider their visual resources to be compromised by the proposed siting of the project.

§3.8 Open Space and Recreation

§3.8.2.2 Operation: "…by providing an indoor facility that allows for use throughout the year, regardless of weather conditions, the proposed facility will have a positive impact on recreational opportunities at the Project site."

The recreational impact for students, faculty and college staff will undoubtedly be positive, but just as surely will prove to be a negative for the public at large, to wit:

"The Project will not result in any permanent loss of public open space or recreation."

This statement is uninformed as to the realities of campus and public interaction. There will be a massive loss of open space if this project is built as planned. While it may not be considered "public" open space, it is open space nevertheless, and is and has been used extensively for decades by members of the public for exercise, fresh air and recreation. The public quality of life that is currently enhanced by that de facto open space will be lost forever. Furthermore, the project sponsor has suggested no provision for public use of the SLC.

§3.9 Traffic and Transportation

§3.9.2.2 Operation: "The proposed Project will not require a significant amount of parking…"

The amount of additional parking needed to accommodate large numbers of students who live in off-campus housing and will likely drive to and from the SLC has been significantly underestimated. Without more on-campus parking, there will be an even greater demand for spaces on already overburdened local streets.

No mention is made in the DEIS of the potential for increased traffic problems at the campus entrance intersection of Tompkins St. and Folmer Dr. As this busy junction also involves a nearby railroad grade crossing and an elementary school with numerous young pedestrians, attention must be given to mitigate possible problems associated with greater SLC-related traffic.

§3.10 Noise

§3.10.2.2 Operation: "Potential sources of noise associated with the operation of the Student Life Center include noise associated with mechanical equipment, such as the building's HVAC system. However, the proposed mechanical systems are entirely located inside the building and are not expected to generate significant external noise."

HVAC systems associated with other campus buildings create frequent objectionable levels of low and mid frequency "droning." What data is available to demonstrate that the SLC's system will be any different?

"In addition, noise from pedestrians traveling to, from, and through the building, as well as students congregating in the outside areas adjacent to the Student Life Center, could affect residents in nearby areas. Overall, operation of the Student Life Center is not expected to generate any significant noise that could potentially impact the adjacent community."

This statement is self-contradictory.

§3.10.3 Mitigation: "Restricting construction activities to the period between the hours of 7:00 a.m. and 6:00 p.m."

No mention is made of construction work being performed on weekends. Such work must be prohibited to give neighborhood residents a respite from construction-related noise, dust and congestion.

We do recognize that there may be some noise reduction with the addition of a building, since it will cancel out noise associated with an open recreation field.

Conclusion

The Environmental Advisory Committee believes that edr has generally performed a competent and workmanlike job in preparing the DEIS, with the reservations mentioned above

One of the charges of this committee is to evaluate the environmental impacts of projects that will have a noticeable effect on the city and its residents, and to suggest ways and means of minimizing those impacts. With that in mind, we are of the opinion that relocating the SLC to a location further west, and with a smaller footprint deserves careful consideration. We urge the project sponsors to reconsider their commitment to the present design and to incorporate our recommendations into the final plan or provide a more adequate explanation for why the legitimate concerns of the adjacent neighborhood must be sacrificed to accommodate competing interests.

Respectfully submitted,

The City of Cortland Environmental Advisory Committee

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