

TOWN OF CAIRO PLANNING BOARD

Part III EAF NARRATIVE

Evaluation of Potential Environmental Impacts

Blackhead Mountain Lodge

DATE

The project, Blackhead Mountain Lodge is located on three parcels in the Town of Cairo, Hamlet of Round Top with a total acreage of 102.31 acres. The following are the parcels that comprise the Project Site:

1. 64 & 74 Crow's Nest Road (116.00-1-24) – 94.95 acres
2. 54 Crow's Nest Road (116.00-1-25) – 1.23 acres
3. 153 Bald Hills Road N (116.16-1-1) – 6.13 acres

The proposed action is illustrated on a site plan prepared by the LRC Group dated December 21, 2023 and last revised November 25, 2024 (the “Site Plan”), and the potential impacts of the Proposed Action are evaluated in the supporting information referenced herein. The Project Site is currently zoned Mountain Top Residential (MT) Zoning District where a tourist resort/spa and hotel are permitted uses subject to a special use permit and site plan approval from the Planning Board.

The main project parcel is currently operating as a hotel and restaurant/bar with outdoor recreation (golf course). The expansion will include improvements that are predominantly within the existing previously disturbed areas. The redevelopment will include approximately 127 keys/units with a 66,270 square foot Main Lodge, tennis courts, pools, restaurant, and 280 proposed parking spaces placed throughout the property (the “Proposed Action”). While the Project Site will operate as one cohesive tourist resort/spa and hotel, some of the hotel units will be owned in fee simple for separate condominium ownership.

Primary guest access will be through a new main access on Bald Hills Road North, about 2,000 feet north of Blackhead Mountain Road. Secondary access (employees, maintenance, etc.) will be from Crow's Nest Road at the existing access point.

SEQRA COMPLIANCE AND INVOLVED AND INTERESTED AGENCIES

The Proposed Action's potential environmental impacts must be reviewed pursuant to the State Environmental Quality Review Act and its implementing regulations in 6 NYCRR Part 617 (collectively, "SEQRA"). Pursuant to 6 NYCRR § 617.6(a)(1)(iv), "as soon as an agency receives an application for...approval of an action, it must" make a preliminary classification of the action as Type 1, Type 2 or Unlisted. This "preliminary classification will assist in determining whether a full EAF and coordinated review is necessary." Based on the materials submitted the Proposed Action would be considered a "Type 1 Action".

The Planning Board circulated its Intent to act as the SEQRA Lead Agent on January 4, 2024, thereby sending to the involved and interested agencies, their notice of its intention to serve as SEQRA lead agency for the Application.

The Applicant has completed Part I and a draft Part II of the Long Form EAF as required by 6 NYCRR § 617.6(a)(2). As further required by SEQRA, The Applicant has identified the agencies that may be involved or interested in the review of the Proposed Action:

- Town of Cairo Planning Board (Special Use Permit/Site Plan/Lot Line Change)
- Town of Cairo Zoning Board of Appeals (Possible Area Variances – as of the date of this document, there are no variances required for the project.)
- Greene County Planning Board (GML 239M)
- Greene County Department of Health (Water/Sewer)
- New York State Department of Health (Water/Sewer)
- New York State Department of Environmental Conservation (General SPDES Stormwater Permit, Water and Wastewater Treatment/Sewer)
- New York State Office of Parks, Recreation and Historic Preservation.

The Lead Agency must consider the criteria for determining the significance of potential environmental impacts from the Proposed Action as set forth in the SEQRA regulations at 6 NYCRR § 617.7(c). To do this, the Lead Agency reviews all relevant information and completes Parts 2 and 3 of the EAF to provide the basis for its SEQRA determination.

EVALUATION OF POTENTIAL ENVIRONMENTAL IMPACTS – DETAILED ANALYSIS

The following materials were utilized as the basis of this determination.

Document List:

Part I FEEF (Full EAF) last revised 01.27.2025 (Revised from 11.25.2024 only to include updated references to revised documents; updated land use chart based on slight modifications to current site plan base on SWPPP updates, and updated maximum daily water demand/liquid waste generation) as well as all the supporting documents listed in **Exhibit A**.

Part II EAF dated XXX

Appendix A – Greene County Parcel Access – Property Cards
Appendix B – Site Plan (originally submitted 12.21.2023)
Appendix B.1 – Site Plan (revised 11.25.2024)
Appendix C – Town of Cairo Comprehensive Plan
Appendix D – HRV Greenway and Heritage Area Maps
Appendix E – Zoning Map
Appendix E.1 – Cairo Zoning Determination Letter (02.27.2024)
Appendix F – Wetland Delineation Report (12.21.2023)
Appendix G – Water & Wastewater Daily Design Flows Report (12.21.2023)
Appendix G.1 – Water & Wastewater Preliminary Report (02.16.2024)
Appendix G.2 – Water & Wastewater Preliminary Report (04.22.2024) – Supersedes Appendices G and G.1
Appendix G.3 – Crawford Report (07.01.2024) – Supplements Appendix G.2
Appendix G.4 – Hydrogeologic Report (11.19.2024) – Supplements Appendices G.2, G.3
Appendix G.4.a - Addendum to Hydrogeologic Report (11.27.2024)
Appendix G.5 – Water Demand for Irrigation Memo (11.25.2024)
Appendix G.6 - Hydrogeologic Report (01.17.2025) - Supersedes Appendices G.4 and G.4a
Appendix H – Preliminary Traffic Assessment (12.21.2023)
Appendix H.1 – Traffic Route Assessment (02.16.2024)
Appendix H.2 – Traffic Report (04.22.2024) – Supersedes Appendices H and H.1
Appendix I – Soil Map (12.21.2023)
Appendix I.1 – Updated Soil Map (04.16.2024) – Supersedes Appendix I
Appendix J – Surface Water Features (12.21.2023)
Appendix K – Flood Map (12.21.2023)
Appendix L – Habitat Suitability Assessment (12.21.2023)
Appendix L.1 – Significant Natural Communities Letter (4.12.2024)
Appendix M – USFWS Species List (12.21.2023)
Appendix N – Farmland Classification (12.21.2023)
Appendix O – Phase 1A and 1B Report (12.21.2023)
Appendix O.1 – OPRHP Sign Off Letter (02.09.2024)
Appendix P – Hudson Scenic Areas (12.21.2023)
Appendix Q – Cross Sections and Viewshed Analysis (02.16.2024)
Appendix R – Preliminary Engineering Report (02.16.2024)

Appendix R.1 – Preliminary Engineering Report – Revised (04.22.2024) – Supersedes Appendix R
Appendix R.2 – SWPPP (07.01.2024) – Supersedes Appendix R and R.1
Appendix R.3 – SWPPP (11.25.2024) – Supersedes Appendix R, R.1, R.2
Appendix S – Fiscal Impact Analysis (04.22.2024)
Appendix T – Agricultural Data Statement (07.01.2024)

Drawing List:

Site Plan set prepared by the LRC Group dated December 21, 2023, last revised November 25, 2024.

CV-1	COVER SHEET
EX-1	EXISTING CONDITIONS
LC-1	LOT CONSOLIDATION PLAN
DM-1	DEMOLITION PLAN
OP-1	OVERALL SITE PLAN
SP-1 THRU SP-4	SITE PLAN
OG-1	OVERALL GRADING/DRAINAGE PLAN
SG-1 THRU SG-4	SITE GRADING/DRAINAGE PLAN
SG-5	WET POND CROSS SECTIONS
SG-6	WET POND CROSS SECTIONS
OUP-1	OVERALL UTILITIES PLAN
SUP-1 THRU SUP-4	UTILITIES PLAN
OE-1	OVERALL EROSION & SEDIMENT CONTROL PLAN
EC-1 THRU EC-4	EROSION & SEDIMENT CONTROL PLAN
LL-0	EXISTING CONDITIONS ILLUSTRATIVE
LL-1	LANDSCAPE PLAN OVERVIEW
LL-2	LANDSCAPE BUFFER PLAN
LL-3	LANDSCAPE BUFFER PLAN
LLS-0	LANDSCAPE KEY PLAN (STORMWATER PRACTICE AREAS)
LLS-1 THRU LLS-3	LANDSCAPE PLAN (STORMWATER PRACTICE AREAS)
LP-1 THRU LP-5	SITE LIGHTING PLAN
CL-0	OVERALL CONSTRUCTION LOGISTICS PLAN
CL-1	LOGISTICS PLAN PHASE ONE
CL-2	LOGISTICS PLAN PHASE TWO
CL-3	LOGISTICS PLAN PHASE THREE, FOUR & FIVE
CL-4	LOGISTICS PLAN PHASE SIX
CL-5	LOGISTICS PLAN PHASE SEVEN
CL-6	LOGISTICS PLAN PHASE EIGHT
OVT-1	OVERALL TRUCK TURNING PLAN
TT-1 THRU TT-4	TRUCK TURNING PLAN
CS-0	CROSS SECTION LOCATION PLAN
CS-1	PERIMETER CROSS-SECTIONS

CS-2	PERIMETER CROSS-SECTIONS
CS-3	PERIMETER CROSS-SECTIONS
PL-1 THRU PL-6	PLAN SHEETS (ROADS / DRIVES)
PR-1 THRU PR-6	PROFILE SHEETS (ROADS / DRIVES)
DN-1	SITE DETAILS
DN-2	STORMWATER DETAILS
DN-3	EROSION CONTROL DETAILS
DN-4	WASTEWATER DETAILS
DN-5	WATER DETAILS

Architectural Sketches and Material Board prepared by Vida Master Planning + Design dated February 16, 2024.

SHEET 1	CORE AREAS / TRANSVERSAL SECTION
SHEET 2	CORE AREAS / EAST ELEVATION
SHEET 3	LOOK AND FEEL
SHEET 4	LOOK AND FEEL

1. Impact on Lands

The main project parcel has operated as a hotel and restaurant/bar with outdoor recreation (golf course) and prior to a golf course and country club the property contained a resort and downhill skiing facility. The expansion will include improvements that are predominantly within the existing previously disturbed areas. The proposed Action will redevelop the Project Site to include approximately 127 keys/units with a 66,270 square foot Main Lodge, tennis courts, pools, restaurant, and 280 proposed parking spaces placed throughout the Project Site.

While some removal of existing tree cover will need to occur during construction, removal of mature trees and forested areas has been minimized to the greatest extent possible. Internal areas of the Project Site will be rewilded with tree plantings and restored with pollinator meadows and native plantings to improve biodiversity and establish some native habitat throughout the resort.

The current Site Plan has been amended and illustrates relocated buildings and interior roadways with reduced impacts on tree removal.

This information is further detailed on the table in Section (E.1)(b) of the Part I EAF. This table has been amended to provide a clarified accounting of existing land uses and cover types on the Project Site. Categories for “Lawn / Golf Course” and “Individual Trees / Clusters of Trees within Golf Course Grass/Lawn” have been added to more accurately distinguish between these cover types and more traditional “Forested” areas with mature trees and understory vegetation.

The Project Site currently contains 32.15 acres of forested areas with mature trees and understory vegetation. In this area, the Proposed Action will remove 9.63 acres of tree cover and understory growth. However, the project will avoid 22.5 acres of forested area which will remain in its current state. With the re-wilding discussed below, a net gain of 16.3 acres of forested area will be added to the Project Site, resulting in 48.5 acres of forested area after project completion.

As noted throughout the applicant’s documents and plans, the Proposed Action will involve the re-wilding of the Project Site. This process will return the golf course from a manicured lawn to an ecosystem. Although this process will take time and will not result in an immediate functional ecosystem, and will not immediately replace some of the mature trees, the holistic approach to the Project Site will begin to reinvent it and return the land to useful habitat that is more consistent with the surrounding properties and land and will re-introduce proper habitat and range for many of the species that are found throughout this community.

The Project Site currently contains 2.7 acres of areas that include individual trees which are set within the existing golf course as well as small clusters of trees with no forested understory. The Proposed Action will remove 1.86 acres of this type of vegetation leaving 0.84 acres.

Most earthwork will involve the excavation for subsurface features including building foundations, stormwater management systems, and placement of fill to level building and parking areas. Following excavation for these features, backfilling and fill operations will bring the development area to the desired grade. A grading plan for the entire Project Site has been prepared by the LRC Group and attached within the Site Plan Set. The Grading Plan shows that the Proposed Action is feasible, while still meeting all the applicable building criteria for slopes, like minimal grades for the proposed roads

and sidewalks to ensure a safe and walkable community. Site impacts on steep slopes will be avoided to the maximum extent possible, including the preservation of an entire area of steep slopes located on the southern portion of the site adjacent to lands referred to by NYS as the Windham-Blackhead- Range Wilderness.

A portion of the project will occur on slopes that are 15% or greater. According to the Site Plan prepared by LRC last revised November 25, 2024, approximately 45% of the site is located on slopes of 15% or greater. Of the 45% of the site that is located on slopes of 15% or greater, 26.5%, or 27.1 acres will be maintained as forested and will not involve any proposed construction. This area is largely on the western portion of the lot adjacent to Catskill Park lands. The balance of site steep slope area that will contain construction is 20.9 acres. A Grading Plan for the project site has been prepared by the LRC Group and can be found on sheet OG-1 and SG-1 through SG-4 of the site plan set. The Grading Plan shows that the proposed action is feasible, while still meeting all applicable building criteria for slopes, such as minimal grades for the proposed roads and sidewalks to ensure a safe and walkable area. Site impacts on steep slopes will be avoided to the maximum extent possible. According to the Applicant, it is anticipated that the proposed resort will be fully built and occupied by 2028, with the majority of the construction onsite completed by Fall 2027. Construction workers and vehicles trips are estimated and accounted for in the updated Traffic Assessment (EAF Appendix H.2). The Proposed Action is a single-phase project and will be broken up into intermittent activity based on the Construction Logistics Plan (CL-1) provided by the applicant.

The site has been designed as a balanced site and therefore there is no export of materials anticipated.

In addition, erosion control measures will be implemented during construction to minimize the erosion of land pursuant to DEC sediment control requirements. For example, a preparation of a full sediment and erosional plan, weekly inspections, and other SWPPP related requirements will be implemented. Thus, erosion of land as a result of this activity will be controlled and minimized through the implementation and maintenance of the sediment and erosion control measures required for the Proposed Action which is further described below.

The Applicant's site/civil engineers (The LRC Group) prepared a preliminary Engineering Report (EAF Appendix R.1) submitted April 22, 2024. The LRC Group also prepared a full SWPPP (Stormwater Pollution Prevention Plan) (EAF Appendix R.3) dated November 25, 2024. The SWPPP is discussed in further detail below in the Stormwater Section of this Part III EAF.

Based on deep tests which were performed at the site on May 15, 2024 and May 16, 2024, the water table depth varies from 3-15+ feet. The depth to bedrock averages over thirty feet and therefore, there is no blasting anticipated.

The Proposed Action's full build-out could create approximately 16.95 acres of new impervious surface on the Site, with an additional 0.29 acres off-site that is within the watershed. This constitutes less than 17% of the entire project site that is impervious surface.

Overall, the Proposed Action will result in the following:

- A net gain of 16.32 acres of forested area
- A 14.86 acre net gain of meadows and grasslands.

- A loss of 1.86 acres of small clusters of trees within the existing golf course greens.
- Impervious surfaces will increase by 11.52 acres onsite, which is approximately 10% of the total Project Site.

Storm runoff from developed areas will be conveyed to and through the stormwater system by a series of underground piping and surface flows. Each stormwater catch basin has been designed to accept stormwater from relatively small watershed areas. Infiltration basins (shallow stormwater basins which store and are proposed to collect and treat runoff into native soils) will collect and treat runoff. Further, Bio-Retention areas (shallow stormwater basins which utilized engineered soils and vegetation) will also collect and treat runoff. Cisterns and the existing pond systems will store stormwater and provide a source for irrigation.

Stormwater will further be managed and conveyed onsite via the creation of new forested and landscaped areas called vegetative swales with the purpose of conveying stormwater at a low velocity promoting natural treatment and infiltration of water back into the subsoils. The impacts of the Proposed Action attributable to the creation of new impervious surfaces are small to moderate.

The proposed project will utilize several types of permanent and temporary stormwater pollutant controls for pre-construction, during construction, and post construction as detailed in the project SWPPP (Appendix R.3). During construction, the project will be phased to limit the exposed soils to reduce sediment runoff and to preserve the quality of surface waters. The Proposed Action will permanently provide landscaping and open areas on the remaining acreage of the Site in conformance with the Town's zoning and site plan requirements.

Based on the foregoing, the Proposed Action is not anticipated to have any significant adverse impacts on land.

2. Impact of Geological Features

There are no unique landforms on the Site that will be impacted by the Proposed Action. No geological feature registered as a National Natural Landmark is present on or next to the Site.

Accordingly, the Proposed Action is not anticipated to have any significant adverse impact on geological features.

3. Impacts on Surface Water:

Surface Water/Water Bodies

The project site contains waterbodies in the form of man-made ponds. These features were created as part of the existing golf course near the existing lodge. The surface of the existing water bodies is 3.09 acres in total.

According to Appendix F, the applicant's consultant states that "three of the golf course ponds are likely not regulated by the USACE since they do not drain off the site and are isolated from navigable

waters - i.e. the Hudson River. Five smaller ponds at the Southeastern corner of the site are connected via drainage ditches/watercourses that drain off the site and appear to be jurisdictional. As indicated on the applicant's Existing Conditions Sheet (EX-1), one of the man-made drainage ditches on site has been designated by NYSDEC as perennial stream under their jurisdiction.

On April 4, 2024, correspondence, the NYSDEC provided the project team with a map showing the streams that their Bureau of Ecosystem Health staff determined to be perennial and protected under Article 15 Protection of Waters regulations. These perennial streams are hereby considered protected Class C(TS) streams, and Article 15 permit coverage will be required for any bed or bank disturbance proposed as part of the project. Based on an onsite review of natural features, NYSDEC staff did not find any streams on site that originated from NYSDEC Forest Preserve Lands. As a result, it was concluded that none of the streams would take on a higher classification in this case (e.g., Class A).

The Proposed Action will include several new bridge crossings over non-regulated streams. Further, the SWPPP will utilize portions of the non-regulated water features for stormwater management.

Existing un-regulated water bodies will be graded to expand and re-shape their physical appearances (the proposed total surface area of water of 4.72 acres resulting in an increase of 1.63 acres). These improvements are limited in size and do not adversely affect rare or unusual or listed species, habitats, or critical environmental areas.

A survey including a wetland delineation was completed by Holtz Surveying on August 10, 2023, which is illustrated on Sheet EX-1 *Existing Conditions*. A letter by Ecological Solutions, LLC, dated December 20, 2023, is included in EAF Appendix F. The delineation was completed in accordance with the USACE Wetlands Delineation Manual (January 1987), Routine Determination Method and Northcentral/Northeast supplement. Wetlands on the Project Site are in the form of man-made ponds that are features on the existing golf course and watercourses that are located near the existing lodge. These areas are features that have clear banks that define the limit of each resource area.

The Wetlands analysis by Ecological Solutions LLC has determined that there are no New York State Department of Environmental Conservation (NYSDEC) Article 24 wetlands on the Project Site. According to the report, three of the golf course ponds are likely not regulated by the USACE since they do not drain off the site and are isolated from navigable waters - i.e. the Hudson River. Five smaller ponds at the Southeastern corner of the Project Site are connected via drainage ditches/watercourses that drain off the site and appear to be jurisdictional to USACE. As the project progresses and the site plan layout and overall road system are reviewed by the Town of Cairo Planning Board, a Pre-Construction Notification (PCN) Form will be submitted to USACE for review.

The proposed action will not involve the use of pesticides or herbicides in or around any water body.

Based on the foregoing, the Proposed Action will not create any significant adverse environmental impacts to surface water resources.

4. Impact on Groundwater

Water Supply

The Proposed Action will create a new public water supply system. The Proposed Action will require an average daily water demand of approximately 46,212 gallons per day (gpd). The source of the water supply will be from private wells with a required yield of 32 gallons/minute with the highest producing well out of service.

Blackhead Mountain Lodge currently has eight wells onsite, which are identified as Well A through C and Well 1 through 5.

The following initial testing has been completed:

- **Wells A and B** - The 24-hour pumping tests for Wells A and B were conducted in June of 2023. During the pump testing of Well A and Well B, the onsite Wells A, B and C were monitored for drawdown. Wells A and B will be abandoned and decommissioned in accordance with NYSDEC and NYSDOH guidelines.
- **Well C** - The 24-hour test for Well C was conducted in February 2024. During the pump test, the on-site wells, a surface water source (SW-1- pond), and four (4) adjoining neighbors' [Henne (Tax map#116.00-1-34), P. Maassmann (Tax map#116.00-1-16.2), E. Maassmann (Tax map#116.00-1-21) and Delaney (Tax map#116.00-1-23)] wells were monitored for drawdown. Well C will be abandoned and decommissioned in accordance with NYSDEC and NYSDOH guidelines.
- **Well 1** - A 72-hour pumping test was completed for Well 1 in March 2024. During the pump test, the on-site wells, a surface water source (SW-1- pond), and four (4) adjoining neighbors' [Henne (Tax map#116.00-1-34), P. Maassmann (Tax map#116.00-1-16.2), E. Maassmann (Tax map#116.00-1-21) and Delaney (Tax map#116.00-1-23)] wells were monitored for drawdown. Well 1 will be abandoned and decommissioned in accordance with NYSDEC and NYSDOH guidelines.
- **Well 2** - A 72-hour pump test was completed for Well 2 in April 2024. During the pump test, on-site wells Well 1, Well A, Well B, and Well C and a surface water source (SW-1- pond) were monitored for drawdown. Additionally, four (4) adjoining neighbors' [Henne (Tax map#116.00-1-34), P. Maassmann (Tax map#116.00-1-16.2), E. Maassmann (Tax map#116.00-1-21) and Delaney (Tax map#116.00-1-23)] wells were monitored for drawdown during pump testing. Well 2 will be abandoned and decommissioned in accordance with NYSDEC and NYSDOH guidelines.
- **Well 3** – Well 3 was drilled on June 10, 2024 and noted by the well driller to have little to no water at a depth of 610 feet. Therefore, it was determined that this well would not receive pump testing as it would not produce sufficient yield to contribute to the proposed water demand. Well 3 will be abandoned and decommissioned in accordance with NYSDEC and NYSDOH guidelines.
- **Well 4A** - was drilled on June 6, 2024 and noted by the well driller to have little to no water at a depth of 605 feet. Therefore, it was determined that this well would not receive pump testing as it would not produce sufficient yield to contribute to the proposed water demand. Well 4A

will be abandoned and decommissioned in accordance with NYSDEC and NYSDOH guidelines.

- **Well 4** - An initial 72-hour variable rate pump test was completed for Well 4 during the week of June 24, 2024. During the pump test for Well 4, all on-site wells, a surface water source, and an additional adjoining neighbors' well [Yanashusky (Tax map#116.0-1-26)] were monitored in addition to the adjoining four (4) neighbors' wells monitored for drawdown during pump testing of Well 2.
- **Well 5** – An initial 72-hour variable rate pump test was completed for Well 5 during the week of August 5, 2024. All on-site wells and a surface water source (SW-1-pond) were monitored for drawdown. Additionally, eight (8) adjoining neighbors' [Henne (Tax map#116.00-1-34), P. Maassmann (Tax map#116.00-1-16.2), E. Maassmann (Tax map#116.00-1-21), Delaney (Tax map#116.00-1-23), Yanashusky (Tax map#116.0-1-26), Petronio (Tax Map#134.00-2-3.1), DuVernoy (Tax Map#116.00-1-41), and Merlino (Tax Map#116.00-1-33)] wells were monitored for drawdown during the initial pump testing.

The onsite wells and neighboring wells continued to be monitored using In-Situ LevelTrolls for continuous data logged monitoring. The neighboring wells have depths ranging from 97 ft to 383 ft. Data logged monitoring of water levels occurred one week prior to pump testing commencement, during the 72-hr pumping test, and during the recovery period.

Sterling Environmental Engineering, P.C. (Sterling) was retained by the applicant in September 2024 to further assist in the hydrogeological testing of a groundwater source to serve the project (See Appendix G.6). The Hydrogeologic Report contained in Appendix G.6 documents the procedures for hydrogeologic testing to determine the safe yield of the local groundwater supply for the project. Based on the water well construction details and preliminary yield, Wells A, B, C, 3, and 4a were eliminated from consideration as water supply wells for the project.

The project will have a maximum daily demand of 32 gallons per minute (gpm) at full build-out and full occupancy. Per New York State¹, the total groundwater source capacity shall equal or exceed the design maximum daily demand with the largest producing well out of service.

To further assess the remaining wells, Sterling oversaw a step drawdown testing program on Wells 1, 2, 4, and 5 to estimate the sustainable long-term yield for each well. The results of the step drawdown test indicated that Well 4 and Well 5 can achieve the maximum daily demand and warranted further evaluation to serve as public water supply wells for the project. Well 1 and 2 are low yielding and were eliminated from further consideration.

As documented in Appendix G.6, a second 72-hour constant rate pump test was performed on Well 4 and Well 5 respectively, which demonstrates that the maximum daily demand can be sustained by each of these wells without causing adverse impacts on the local aquifer.

The 72-hour constant rate pump test of Well 5 was performed in November 2024 during a state-issued drought watch for Greene County. Well 5 was pumped for 72 hours at a constant rate of 32

¹ New York Codes Rules and Regulations Subpart 5-1 Public Water Supplies (Subpart 5) and the 2022 Recommended Standards for Water Works.

gpm and reached stabilization for the final 7 hours and 50 minutes of the test. The water level continued to decline slightly throughout the constant rate test and recovered to 75% of the pre-test water level after 24 hours of recovery. In accordance with NYSDOH Part 5, a detailed hydrogeologic assessment was performed since the well did not recover to 90% of the pre-test water level after 24 hours of recovery. Per NYSDEC regulations², a 180-day drawdown projection analysis was performed and the aquifer transmissivity was calculated to confirm the long-term availability of water from the well and to perform an assessment of potential impacts at neighboring offsite private water supply wells. In addition, NYSDOH Part 5 states that an assessment of seasonal drought conditions should be performed if recovery is not achieved. The project performed the 72-hour test during drought conditions and used those drought drawdown rates for the 180 day projections, which satisfied the requirement for at least 5 feet of water column remaining above the test well pump. Therefore, the testing and projections are appropriate, conservative, and in accordance with regulations referenced above.

The 180-day projection analysis for Well 5 indicates a total projected drawdown of 114.05 feet resulting in a remaining water column height of 107.75 feet after 180 days of continuous pumping at the maximum daily demand for the project. The 180-day drawdown analysis is a worst-case analysis assuming no recharge and continuous pumping for a 180-day period. As described in Section 1.0 of Appendix G.6, the actual long-term water demand for the project is expected to be substantially lower than the 32 gpm pumping rate assessed in this report for purposes of permitting the wells for the maximum daily demand.

The 72-hour constant rate pump test of Well 4 was performed in December 2024. Well 4 was pumped for 72 hours at a constant rate of 32 gpm and reached stabilization for the final 18 hours and 10 minutes, indicating that the well has a safe yield at the rate at which it was pumped during the constant rate test and may actually be capable of supporting a safe yield in excess of 32 gpm. The water level continued to decline slightly throughout the constant rate test and recovered to 83.6% of the pre-test water level after 24 hours of recovery. An analysis of the drawdown and recovery data using This equation in AQTESOLV software resulted in aquifer parameters consistent with a fractured shale/sandstone bedrock aquifer. The 180-day projection analysis indicates a total projected drawdown of 134.42 feet resulting in a remaining water column height of 220.75 feet after 180 days of continuous pumping at the maximum daily demand for the project.

The 180-day projection analysis for Well 4 indicates a total projected drawdown of 134.42 feet resulting in a remaining water column height of 220.75 feet after 180 days of continuous pumping at the maximum daily demand for the project. The 180-day drawdown analysis is a worst-case analysis assuming no recharge and continuous pumping for a 180-day period. As described in Section 1.0 of Appendix G.6, the actual long-term water demand for the project is expected to be substantially lower than the 32 gpm pumping rate assessed in this report for purposes of permitting the wells for the maximum daily demand.

A review of the pumping test data for Well 5 and Well 4 indicates that groundwater flow into the wells is contributed by both the shallow and deep fracture zones. Wells intercepting both the shallow and deep zones display a period of recharge controlled by the more permeable lower fracture zone until

² <https://dec.ny.gov/environmental-protection/water/water-quantity/water-withdrawal-permits-reporting/pumping-test-procedures-for-applications>

the water level reaches the level of the hydraulic head in the deeper fracture zone. As shown in Table 6 of Appendix G.6, the groundwater elevations recovered to a nearly identical elevation (i.e., approximately 677 feet) for each pumping test at varying pumping rates. Recovery to a specific elevation regardless of pumping rate indicates that full recovery is occurring to the level of the hydraulic head present in the more permeable deeper fracture zone. The consistent recovery to approximately 677 feet amsl indicates that the piezometric surface has remained stable throughout the hydrogeologic investigation and is not being permanently lowered by pumping of the wells at 32 gpm. Figure 6 in Appendix G.6 displays the recovery data from the four pumping tests with time normalized to minutes and the start of recovery for each pumping test set at time equals zero. The time-drawdown curve for the pumping tests completed at Well 5 and Well 4 passes approximately through the 677 ft amsl point at 24 hours of well recovery. Thereafter, recharge is slower, reflecting the inflow of water from the upper, lower permeability fracture zone. This phenomenon was identified at both Well 5 and Well 4 during constant rate pumping tests at multiple pumping rates and in the offsite monitoring wells E. Maassmann and R. Green.

A well recovery analysis is presented in Figure 7 for Well 4 and Well 5. The plots display the time drawdown curves with extended drawdown curves for the pumping tests completed in November and December 2024. True well recovery incorporates the difference between the measured water level in a well at a given time after pumping stops and the level to which the water would have dropped if pumping continued until that instant. In theory, the degree of water level recovery at any time after pumping ceases should be identical with the drawdown for the same time during the pumping period. Well recovery data measured at 24 hours of recovery was used to back calculate the drawdown data at 24 hours of pumping.

Well 5 displayed a 24-hour extended recovery of 59.97 feet of following the November 2024 pumping test. Drawdown in Well 5 was 63.08 feet at exactly 24 hours of pumping. A difference of 3.11 feet remained between the extended and actual drawdown data. The difference in head (3.11 feet) was added to the water level measured in the well at 24 hours recovery to calculate an interpreted actual deep zone static water level. The water column above the deep zone static level is supplied by the less permeable upper fracture zone, as displayed in the slow recovery above the 677-foot elevation. Given this information, well recovery was recalculated for Well 5 using $\text{Total Drawdown} / (\text{Total Drawdown} + \text{Additional Head}) * 100 = 95\%$ recovery in 24 hours $(59.97' / (59.97' + 3.11') * 100 = 95\%)$.

Similarly, Well 4 displayed 24-hour extended recovery of 89.48 feet following the December 2024 pumping test. Drawdown in Well 4 was 95.28 feet at exactly 24 hours of pumping. A difference in hydraulic head of 5.80 feet remained between the interpreted and actual drawdown data. The difference in head (5.8 feet) was added to the water level measured in the well at 24 hours recovery to calculate an interpreted actual deep zone static water level. The water column above the deep zone static level is supplied by the less permeable upper fracture zone, as displayed in the slow recovery above the 677-foot elevation. Given this information, well recovery was recalculated for Well 4 using $\text{Total Drawdown} / (\text{Total drawdown} + \text{additional head}) * 100 = 94\%$ recovery in 24 hours $(89.48' / (89.48' + 5.80') * 100 = 94\%)$.

Based on the above analysis, Well 4 and Well 5 achieve the target 90% recovery within 24 hours when focusing on the deeper fracture zone that is the primary source of groundwater to the wells.

The results of the pumping tests and analyses indicate that both Well 5 and Well 4 can individually support a safe yield of at least 32 gpm operating continuously (i.e., 24 hour per day). An influence on offsite private water supply wells was observed for two out of six monitored wells. The affected wells

appear to intercept the same bedrock joint orientation in the northwest-southeast direction as do Well 5 and Well 4. While an influence was observed, the pumping test occurred during drought conditions and normal use of the private wells. Observed drawdown and the projected 180-day drawdown analysis indicates adequate water column is maintained in the private wells for continued uninterrupted use. The 180-day drawdown analysis is a worst case analysis assuming no recharge and continuous pumping for a 180-day period. The actual long-term water demand for the project is expected to be substantially lower than the 32 gpm pumping rate assessed in this report for purposes of permitting the wells for the maximum daily demand.

The direct influence observed at two offsite private residential water supply wells is not significant and does not indicate that the project would deplete the aquifer serving the private wells. The projected 180-day drawdown in the E. Maassmann well retained over 100 feet of available water column for the residential use. As noted in Section 2.4.5 of Appendix G.6, the E. Massmann well pump is currently set too high to access the available remaining water column and is recommended to be lowered to have full access to the water column. The exact depth of the R. Green well is not known, but the well exhibited identical characteristics as the E. Massmann well and is expected to have access to a similar remaining water column that is adequate for residential use.

The Hydrogeologic Study (appendix G.6) documents that the safe yield of Well 4 and Well 5 is at least 32 gallons per minute (gpm) and capable of supporting development projects that will extract groundwater at a rate equal to or less than 32 gpm. The direct influence observed at two offsite private residential water supply wells is not significant and does not indicate that the project would deplete the aquifer serving the private wells. Nevertheless, the following mitigation is readily available if deemed necessary to alleviate potential concerns:

1. Install Deeper Wells: The E. Maassmann and R. Green wells are installed into the deeper higher permeability fracture zone. Both wells could be extended deeper to set their pumps deeper than the stabilized drawdown elevation of Well 4 and Well 5. The drawdown at the offsite residential wells will not be deeper than the drawdown at the project pumping well.
2. Connect to Public Water Supply: The E. Maassmann and R. Green wells are immediately adjacent to the project site and could feasibly be incorporated into the project water supply system. To accomplish this, a Transportation Corporation would have to be established to deliver water across property boundaries. Single-family dwellings have a design water demand of 110 gallons per bedroom per day (i.e., 330 gpd for a three bedroom dwelling and 440 gpd for a four bedroom dwelling). Using a residential demand of 500 gpd per dwelling would require an allocation of 1,000 gpd (0.7 gpm) from the design demand flow for the project.

With respect to the water supply for the project, the applicant must comply with any and all requirements of the NYS Department of Health and if applicable the NYS Department of Environmental Conservation and that no application can be made for utilization of potable water demand greater than 32 gpd. Further, the pumping test for the proposed water supply of 32 gpd followed the DOH procedures and has been provided to the Town by the applicant. The information provided concludes that there are no potential significant adverse environmental impacts for purposes of SEQRA. Further technical analysis and a detailed review of the proposed water supply system will be conducted by the State as part of its permitting review for the proposed system.

Following approval of the water supply by NYSDOH, all onsite wells except Well 4 and Well 5 will be abandoned in accordance with applicable regulations prior to putting the water supply into service.

Water for irrigation purposes was not included in the maximum daily water demand of approximately 46,212 gallons per day (gpd) because it will not be withdrawn from the public water supply system (i.e. potable water). Water for irrigation purposes will be provided from the on-site non-regulated pond and/or the stormwater systems (See Appendix G.5).

During construction, water to establish seeded and landscaped areas will be drawn from the existing non-DEC regulated pond on site. Approximately 1.75% (23,000 GPD) of the pond's capacity (1.3 million GDP) will be pulled for irrigation. By the fourth phase of construction, the stormwater system will become operational, therefore stormwater can become the primary source of irrigation.

Beyond the construction and initial landscaping establishment, approximately 3,037 GPD will be required for permanent irrigation needs of the landscaped areas around the primary amenity buildings. Water for ongoing irrigation will be drawn from the stormwater infrastructure. Cisterns to store the stormwater will be located in proximity to the amenity building to provide for the permanent irrigation demand. This demand can also be supplied by water from the existing non-DEC regulated pond onsite. Once the resort becomes occupied, treated domestic water effluent will recharge the pond that matched the daily potable water consumption, minus infiltration and evaporation loss (approximately 10%).

The well testing reports, data, and irrigation demand and supply calculations demonstrate an adequate on-site water supply to serve the potable and non-potable water demands of the Proposed Action.

Wastewater

The Proposed Action includes a new wastewater treatment plant with discharge into an unnamed stream. The total anticipated waste generation per day is 46,212 gallons per day.

Based on the provided existing building uses, anticipated daily flows associated with the existing site were generated. It is estimated that the daily design flow for the existing sites wastewater and water is 14,310 gallons per day (gpd). The wastewater treatment system on site operates under State Pollutant Discharge Elimination System # (SPDES #) NY0241857. There are two leach fields currently servicing the existing site for wastewater treatment. One leach field is located across the road from the main entrance on Crows Nest Road, and the other is located behind the pro-shop/clubhouse onsite. The system also includes septic tanks, grease traps, and sewer mains. This system will be abandoned, and a new wastewater treatment plant is proposed.

Since the hydraulic loading rate is greater than 1,000 gpd, the site's sewer collection and treatment system will conform to the applicable standards in the NYSDEC "Design Standards for Intermediate Sized Wastewater Treatment Systems, 2014" and the "Recommended Standards for Wastewater Facilities, 2014", also called the "Ten States Standards".

Proposed design flows will be treated in a wastewater treatment plant (WWTP) process consisting of equalization tanks, sludge holding tanks, Moving Bed Biofilm Reactor (MBBR), Bioclere units, sand

filtration, and disinfection. Gravity collection will be utilized as much as possible on site, limited pump stations in the lower residential area.

The proposed wastewater treatment facility as designed will include primary, secondary, and tertiary treatment prior to discharge. Each tank will be fitted with an appropriately sized effluent filter. The tanks will provide solids removal prior to entering the collection system and subsequently the flow equalization tanks at the wastewater treatment plant. The wastewater treatment plant is proposed with discharge into an unnamed on-site stream channel, which discharges to another unnamed stream and then ultimately to the Shingle Kill.

A SDPES permit will be required prior to the commencement of discharge from the site. A condition of the permit would be testing of the treated effluent to ensure that treatment standards are being met. An effluent testing schedule would be provided with the SPDES permit. The testing would have to be completed by a certified operator. The exact testing schedule would be determined by NYSDEC during the permitting process.

In addition to the testing of the treated effluent, an Operation and Maintenance (O&M) plan will be prepared for the proposed wastewater treatment plant and included in the Engineer's report submitted to the NYSDEC for review and approval. The O&M plan will outline the required maintenance of the treatment plant, as well as the protocols for the procedures for residual (sewer sludge) hauling and disposal. In general, individual septic tanks servicing the buildings will be pumped out and inspected on a schedule of every two to five years. Septage from the wastewater treatment plant septic tanks will be removed periodically. Pumps outs and hauling shall be completed by a professional hauler with a valid NYSDEC Part 364 permit. Services for offsite sludging handling will be provided by an offsite vendor, with separate NYSDEC permits related to their facilities and operations.

Stormwater

Elevations at the Project Site vary from one side of the property to the other, while the topography in between is characteristic of rolling hills with long open flats as the property was historically developed as a golf course. The landscape within the Project Site is generally sloped; with steep slopes and exposed bedrock along the western portion and the eastern portion of the project is a compacted gravel parking area that surrounds the existing buildings.

The existing land cover consists of a combination of impervious building structures, asphalt pavement, grass, and wooded areas. Currently, the Project Site is an existing golf course, hotel and restaurant. The existing watershed has 5.43 acres of impervious surface. The proposed development within the watershed will have a total of 16.95 acres of impervious surface.

Offsite drainage areas have been compiled from available mapping, site inspections, and county topographic data. Impervious calculations in this report and used for stormwater calculations are based on total watershed area and may differ from other calculations which are site specific.

Soils found at the site have been classified by the United States Department of Agriculture (USDA) Soil Survey of Greene County, New York. The following soil groups are present:

- EIC- Elka Channery Loam – 8 to 15% slopes

- EID- Elka Channery Loam – 15-25% slope
- LaC- Lackawanna Channery loam
- MoB- Morris channery silt loam
- OsC- Oquaga-Arnot complex- very rocky
- TvB- Tunkannock gravelly loam fan
- VhC- Vly-Halcott complex- very rocky- 3 to 15% slopes
- VhD- Vly-Halcott complex- very rocky-15 to 35% slope

On-site deep testing and infiltration testing around the site stormwater improvements revealed, primarily, a consistent draining “Class C” soil type.

Storm runoff from developed areas will be conveyed to and through the stormwater system by a series of underground piping and surface flows. Infiltration Basins, bioretention areas, infiltration trenches, vegetated swales, underground stormwater cisterns, and wet ponds are proposed to collect and treat runoff.

During and after construction of the Proposed Action, stormwater will be managed, treated and discharged in accordance with the requirements set forth in the New York State Department of Environmental Conservation (“NYSDEC”) State Pollution Discharge Elimination System (“SPDES”) general stormwater permit and the Proposed Action’s Stormwater Pollution Prevention Plan (“SWPPP” Appendix R.3)

The Proposed Action’s Site Plans and SWPPP are designed to comply with all applicable NYSDEC requirements for managing stormwater during and after construction. Further, during construction, erosion and sediment control, soil stabilization, dewatering and pollution prevention measures will be installed, implemented and maintained on the Site as set forth in the SWPPP to minimize the discharge of erosion of sediment and prevent a violation of the State’s water quality standards. These measures are designed to limit erosion of land by controlling the flow of water until permanent stormwater control measures are installed and pervious surfaces are stabilized with vegetation and/or buildings and parking areas. Measures will include but not be limited to installation of silt-fencing to control disturbed area; stockpiling soils and vegetative soil stabilization; seeding and mulching of all disturbed surfaces; dust control (as necessary); and ongoing inspection and maintenance of erosion control measures to ensure their effectiveness until all disturbed surfaces are stabilized.

Post-construction stormwater management practices for the Proposed Action as set forth in the SWPPP are designed to conform to applicable requirements in the NYSDEC general stormwater permit, the standards provided by the New York State Stormwater Management Design Manual (“Design Manual”). The Proposed Action is designed, through the SWPPP, to provide for the installation, implementation and maintenance of permanent stormwater management practices to meet the standards in the Design Manual so that discharges comply with the State’s water quality and quantity standards.

Specifically, post-construction, the Proposed Action's stormwater management system will collect stormwater run-off from the Site through a series of catch basins, pipes and vegetated swales to convey the water to various stormwater management facilities and green infrastructure practices including infiltration basins, bio-retention areas, wet ponds, vegetative swales, infiltration trench, etc. Sediments and other contaminants in the run-off will be removed by or will settle out in these facilities before the treated stormwater will be released to the drainageway along the western property boundary. As required by the NYSDEC stormwater regulations, the peak rate of run-off from the Project Site will be the same or less than peak rate of run-off under the existing conditions.

Based on the foregoing, the Proposed Action will not create any significant adverse environmental impacts to groundwater resources.

5. Impacts on Flooding

The proposed project is not in a floodway or floodplain nor located within a designated floodway. The proposed project has been redesigned to minimize impacts on existing water features. The project expands the existing non-regulated water bodies and develops areas for stormwater treatment.

Based on the foregoing, the Proposed Action will not create any significant adverse environmental impacts to flooding.

6. Impacts on Air

The Proposed Action will not result in any significant adverse impacts on air quality. The Proposed Action does not include a State regulated air emission source or involve any activity that will have more than a minimal impact on air quality. Therefore, no significant localized air quality impacts are expected.

Based on the foregoing, the Proposed Action will not create any significant adverse impacts to air quality.

7. Impact on Plants and Animals

The Project Site is an existing golf course which predominantly consists of manicured lawn with scattered and isolated trees and shrubs. The proposed project will result in the following:

- A net gain of 16.32 acres of forested area
- A 14.86-acre net gain of meadows and grasslands.
- A loss of 1.86 acres of small clusters of trees within the existing golf course greens.

According to the report prepared by Ecological Solutions in Appendix L, USFWS identifies the following possible endangered or threatened species on the project site:

- Indiana Bat

- Northern Long-eared Bat
- Monarch Butterfly.

The applicant provided a Threatened and Endangered Species Habitat Suitability Assessment Report (see Appendix L & L.1). The provided report evaluates natural communities onsite and the proposed removal of limited amount of trees and concludes that *“Impacts to [Indiana Bat] species are unlikely and there is no adverse impact that will occur from tree removal.”* The report further concludes that, *“The northern long eared bat requires/ occupies practically the same habitat niche as the Indiana bat. Impacts to habitat and mitigation would be consistent with the recommendations for the Indiana bat.”* With regard to the Monarch Butterfly the report concludes that *“There is no successional field habitat or potential habitat for the monarch butterfly and no milkweed plants were observed in the project area so impact to this species is not expected. The open areas of the site are manicured golf course.”* Furthermore, according to EAF Part 1 Section E.1.b. the proposed project will add approximately 15.13 acres of meadows, grasslands, and brushlands which may serve as habitat for the Monarch Butterfly.

Based on the foregoing, the Proposed Action will not have any significant adverse impacts on plants or animals. The rewilding of many open spaces, that were previously golf course, will likely positively impact the surrounding wildlife creating additional habitat for indigenous wildlife.

8. Impact on Agricultural Resources

Although the Project Site contains productive soils, it has been used as a golf course/hotel/restaurant for decades. Thus, the Project Site is not being used for Agricultural Purposes. The site is not located next to other properties within a New York State Agricultural District currently partaking in agricultural activities (See Appendix T).

Based on the foregoing, the Proposed Action will not have any significant adverse impacts on Agricultural Resources.

9. Impact on Aesthetic Resources

The proposed Project Action and structures are consistent with land uses in the surrounding area. The existing land use onsite include one- and two-story structures that are predominantly located along the eastern portion of the site. However, although the existing land use is a golf course/hotel/restaurant with large, the Project Site is predominantly cleared areas for golf course greens. The proposed action falls under the same land use pattern as the existing use.

As shown in the Viewshed Analysis (Appendix Q) the architecture of the project has been purposefully designed as one – two story structures with massing similar to nearby residential structures. Further, the applicant has provided a viewshed analysis that illustrates the structures will be predominantly located within the existing slopes of the project area limiting the view of the buildings. The proposed buildings comply with the Town’s Zoning requirements with respect to height and setbacks. A landscaping plan has been proposed that provides an extensive landscaped berm and plantings adjacent to the nearest residential properties as well as creates 16.32 acres of forested area and 14.86 acres of meadows and landscaping, effectively re-wilding the property back to

an ecosystem more similar to the surrounding area (see Landscaping Plan in Appendix B.1, Sheets LL-0 to LL-3).

The Proposed Action will not obstruct any officially designated scenic views. Further, the proposed action is not located in or adjacent to any NYS Scenic Areas of Statewide Significance (SASS).

Based on the foregoing, the Proposed Action will not have any significant adverse impacts on Aesthetic Resources.

10. Impact on Historical and Archeological Resources

It is not anticipated that the Proposed Action will impair the character or quality of any important historical and/or archaeological resources. No historic buildings or sites listed on the State or National Registers of Historic Places are located on or near the Property. The Property is not located in or adjacent to an historic district. Further, the NYS Office of Parks, Recreation and Historic Preservation Office reviewed the Proposed Action and issued a letter concluding that development on the Site will have no adverse effect upon archeological or historic resources (Appendix O.1).

Based on the foregoing, the Proposed Action will not create any significant adverse impacts to cultural resources.

11. Impact on Open Space and Recreation

The Project Site is not located within an area listed in an adopted municipal open space plan. The Project Site has been utilized as a private recreational golf course and hotel/restaurant. The redevelopment of the Property will include private recreational resources in the form of pools, tennis courts, gym, and expansive walking trails. The facility will also be served by regional recreational services such as the nearby Windham-Blackhead- Range Wilderness Area within the Catskill Park and Cairo Nature Preserve. Therefore, the Proposed Action will not result in any loss of a public open space resource designated in a governmental open space plan.

Based on the foregoing, the Proposed Action will not have any significant adverse impact on open space and recreational resources.

12. Impact on Critical Environmental Areas

Redevelopment of the Project Site will not have any impact on any critical environmental areas (CEAs) designated by NYSDEC because the Project Site does not contain any CEAs. Nor are any CEAs located adjacent to the Project Site.

Based on the foregoing, the Proposed Action will not have any significant adverse impact on Critical Environmental Areas.

13. Impact on Transportation

The Applicant has provided a Traffic Analysis prepared by Creighton Manning Engineering, LLP dated April 22, 2024. As part of the analysis, the Applicant Analyzed the following Intersections

- Hearts Content Road (CR 31)/CR 39/Maple Lawn Road
- Hearts Content Road (CR 31)/Blackhead Mountain Road
- Blackhead Mountain Road/Bald Hills Road/Crow's Nest Road
- Hearts Content Road (CR 31)/Bald Hills Road/Mountain Avenue (CR 24)

The principal use includes guests arriving, checking into and checking out and departing the resort. Occupancy is expected to peak on summer weekends. Turning movement counts were conducted at the study area intersections on Friday April 5, 2024, from 3:00 to 6:00 pm and on Sunday April 7, 2024, from 10:00 am to 1:00 pm to represent the typical arrival and departure of most guests.

The observed peak hours generally occurred from 3:00 to 4:00 pm on Friday and 11:00 am to 12:00 pm on Sunday. To account for summer conditions, the existing traffic data was seasonally factored from April to June, which represents the peak summer condition according to NYSDOT for Factor Group 30 roads. Existing April traffic volumes were increased by 11% to represent June (summer) conditions.

The Traffic Assessment included an evaluation of traffic operations and intersection level of services and concluded that presently all study area intersections operate at LOS A on all approaches. Upon full build out of the Proposed Action, for both the Friday and Sunday peak hours, delays will increase by less than one second per vehicle. Therefore, given the de minimis traffic impacts, no mitigation is necessary.

The Applicant's Traffic Engineer also conducted an inventory of local roads as part of their Traffic Assessment (EAF Appendix H.2). The Traffic Assessment found that area roadways are in generally fair shape with signs of cracking and fatigue. However, the Traffic Assessment also notes that construction is expected to occur over 26 months and that trucks are expected to use Blackhead Mountain Road as the primary route to the site.

The Applicant's Traffic Engineer estimates that construction worker trips will equate to around 83-108 one-way trips, or 166 to 216 two-way trips (arrive in the morning, leave in the afternoon) during the peak stage of construction. The Applicant has agreed to complete a pre-analysis of the existing roadway system with the Town of Cairo Highway Superintendent prior to the commencement of any work on site. The scope for this work will be coordinated with the Town of Cairo Highway Superintendent and could include the following roads:

- Hearts Content Road (CR 31)/CR 39/Maple Lawn Road
- Hearts Content Road (CR 31)/Blackhead Mountain Road
- Blackhead Mountain Road/Bald Hills Road/Crow's Nest Road
- Hearts Content Road (CR 31)/Bald Hills Road/Mountain Avenue (CR 24)

The Applicant will repair any deteriorated public roadway conditions that have resulted from construction traffic on the roadway system. Further, the Applicant will post a bond in an amount agreed upon by the Town Highway Superintendent that will be held in escrow by the Town to ensure that any deterioration of the roadway is repaired by the Applicant.

A sight distance evaluation was also completed (Appendix H.2) at the two proposed Site Driveway locations on Bald Hills Road and Crows Nest Road. Available intersection sight distance was measured from the perspective of a vehicle exiting the site. The available intersection sight distance will provide drivers a sufficient view of the intersecting roadway to allow passenger cars to enter or exit the intersection without excessively slowing vehicles traveling at or near the operating speed on the intersecting mainline.

Stopping sight distance was also measured (Appendix H.2) on Bald Hills Road and Crows Nest Road at both site driveway locations. The available stopping sight distance on a roadway will be of sufficient length to enable a vehicle traveling at or near the operating speed to stop before reaching a stationary object in its path.

Based on the foregoing, the Proposed Action will not have any significant adverse impact on transportation resources.

14. Impact on Energy

The Proposed Action will require the use of energy—specifically electricity — for heating, cooling, lighting and other purposes. This energy usage will be similar in amount to the energy used for other existing facilities in the Town, County, and across the State. The Proposed Action is not a high energy user. Overall, the Proposed Action will not result in a significant increase in the use of energy and the project will meet the NYS Energy Code.

Accordingly, no significant adverse impact on energy will occur.

15. Impact on Noise, Odor, and Light

No significant adverse noise or odor impacts are expected from the Proposed Action. During construction, any noise and odor impacts from construction equipment will be temporary, of short duration and non-significant and compliant with the Town's noise regulations (to wit, no building construction operations outside the hours of 6:00 AM and 8:00 PM). After construction, during Proposed Action operations, no odor impacts are anticipated. The Proposed Action is not a manufacturing or industrial facility and will not produce any odors.

The plans for the Proposed Action indicate a dense vegetated buffer along the portions of the Project Site which are adjacent to residential properties. Additional landscaping will be added to provide a further visual and noise buffer (see Landscaping Plan in Appendix B.1, Sheets LL-0 to LL-3).

New, modern and energy-efficient lighting will be utilized throughout the Project Site (Site Plan Set Sheets LP-1 through LP-5). Exterior site lighting will be designed to comply with the Zoning and Site Plan Regulations and are the minimum necessary while ensuring a safe and secure facility. All proposed

lighting will be downward facing and will minimize sky glow and light pollution from the Property. Where appropriate, lighting fixtures will be of a full cutoff type or provided with shields to reduce glare and light pollution. The fixture locations have been sited to minimize light trespass onto adjacent properties. The following measures have been incorporated to minimize otherwise potential adverse impacts from site lighting of the new building and parking facilities.

- All light fixtures shall be full cut-off optics and are dark sky compliant.
- All light fixtures shall be lamped with LED light sources to optimize energy consumption and provide long lamp life and consistent light output over time.
- Color temperature of all light fixtures will be 3000 kelvin or warmer.
- Lens mounting heights of post top fixtures are 10' and 12' (parking lots) and bollard light lens heights are 3'-0".

Hours of Operation for Lighting:

- Parking lots - post top lighting of guest and employee parking lots shall be activated at dusk by photocell and will remain active at 100% of their output until 10:00 pm. At that time, lights shall be reduced to 50% output until sunrise, however, lights shall be equipped with motion sensors to ramp up to 100% output when motion by vehicle or pedestrians is detected. At dawn, lights shall be turned off by photocell until the subsequent arrival of dusk.
- Main vehicular internal roadway and condo driveways - post top lighting for these vehicular use areas shall be activated at dusk by photocell and will remain active at 100% of their output until 10:00 pm. At that time, lights shall be reduced to 75% output until sunrise.
- Pedestrian pathways - bollard and post top light fixtures along driveways, pedestrian pathways, drives limited to golf carts and adjacent to primary amenity buildings or activities shall be activated by photocell (on circuits) and remain active at 100% of their output until dawn each evening.
- Accent and landscape lighting around primary amenity buildings, guest lodging units or adjacent to hotel operational spaces shall be activated by photocell and shall remain operational from dusk to dawn.

Based on the foregoing, the Proposed Action will not cause any significant adverse impacts involving noise, odor or light.

16. Impact on Human Health

No significant impacts to human health are anticipated from the Proposed Action because all construction and operational activities will be undertaken in accordance with and in compliance with all pertinent environmental and land development regulations and related permit and approval procedures and requirements. The Proposed Action will be serviced by a public municipal water and sewer systems (approved by the Department of Health and NYSDEC) and no septic system will be used.

The Project Site has been designed so that fire and emergency vehicles will have full access to the site and all structures. The plans have been reviewed by the Fire Department and Police Department accordingly. The Applicant will continue to work with both departments throughout the Site Plan review process to address any further necessary design modifications.

Based on the foregoing, the Proposed Action will not cause any significant adverse impacts involving Human Health.

17. Consistency with Community Plans

The Proposed Action is consistent with the Town of Cairo Comprehensive Plan, complies with the Zoning and Site Plan Regulations and is consistent with the existing land use and surrounding area. The Project Site is situated in the Town's Mountain Top Residential (MT) Zoning District. According to the Town's Zoning Law, one of the purposes of the MT Zoning District is to "promote commercial development in a manner that is consistent with the established resort and tourism character of the district". The Applicant is expanding and updating the existing resort use at the Project Site to encompass a Hotel and Tourist Resort/Spa which are both permitted uses in the MT Zoning District via Special Use Permit and Site Plan approval from the Planning Board.

Nestled at the base of Blackhead Mountain, the project is an expansion and upgrade of an existing mountain lodge resort. The Town of Cairo's Comprehensive Plan notes that aging resorts and changing tourism clientele and needs are a weakness hindering the Town from accomplishing its vision of a highly sought after tourist destination³. Despite the addition of additional structures, the project will result in a net gain in acres of forested area which allows the project to stay consistent with the rural and secluded area surrounding the site.

For the foregoing reasons, the Proposed Action will not have a significant adverse impact on the Town of Cairo's community plans.

18. Consistency with Community Character

The Proposed Action is consistent with the residential and commercial character of the area and will not have a significant adverse impact upon the prevailing agricultural character of the Town. The main project parcel formerly operated as a hotel and restaurant/bar with outdoor recreation (golf course). The proposed redevelopment will include improvements within the existing previously disturbed areas. Despite the addition of additional structures, the project will result in a net gain in acres of forested area which allows the project to stay consistent with the rural and secluded area surrounding the Project Site.

Proposed buildings are designed to be architecturally consistent with the vernacular styles of the community. The proposed architectural design of the project is that of a modern chalet style being consistent with the Alps/chalet style influence which is prevalent in the Round Top community, helping to preserve the community character and culture of the surrounding area. The new buildings will utilize the existing grades onsite to visually screen the massing of the buildings.

A landscaping plan (Appendix B.1, Sheets LL-0 to LL-3) has been proposed that provides an extensive landscaped berm and plantings adjacent to the nearest residential properties as well as creates 16.32

³ Town of Cairo Comprehensive Plan pages 7 and 10.

acres of forested area and 14.86 acres of meadows and landscaping, effectively re-wilding the property back to an ecosystem more similar to the surrounding area.

New, modern and energy-efficient lighting will be utilized throughout the Project Site (See Lighting Plan in Appendix B.1, Sheets LP-1 to LP-5). Exterior site lighting will be designed to comply with the Zoning and Site Plan Regulations and are the minimum necessary while ensuring a safe and secure facility. All proposed lighting will be downward facing and will minimize sky glow and light pollution from the Property. Where appropriate, lighting fixtures will be of a full cutoff type or provided with shields to reduce glare and light pollution. The fixture locations have been sited to minimize light trespass onto adjacent properties. The following measures have been incorporated to minimize otherwise potential adverse impacts from site lighting of the new building and parking facilities.

- All light fixtures shall be full cut-off optics and are dark sky compliant.
- All light fixtures shall be lamped with LED light sources to optimize energy consumption and provide long lamp life and consistent light output over time.
- Color temperature of all light fixtures will be 3000 kelvin or warmer.
- Lens mounting heights of post top fixtures are 10' and 12' (parking lots) and bollard light lens heights are 3'-0".

Hours of Operation for Lighting:

- Parking lots - post top lighting of guest and employee parking lots shall be activated at dusk by photocell and will remain active at 100% of their output until 10:00 pm. At that time, lights shall be reduced to 50% output until sunrise, however, lights shall be equipped with motion sensors to ramp up to 100% output when motion by vehicle or pedestrians is detected. At dawn, lights shall be turned off by photocell until the subsequent arrival of dusk.
- Main vehicular internal roadway and condo driveways - post top lighting for these vehicular use areas shall be activated at dusk by photocell and will remain active at 100% of their output until 10:00 pm. At that time, lights shall be reduced to 75% output until sunrise.
- Pedestrian pathways - bollard and post top light fixtures along driveways, pedestrian pathways, drives limited to golf carts and adjacent to primary amenity buildings or activities shall be activated by photocell (on circuits) and remain active at 100% of their output until dawn each evening.

Accent and landscape lighting around primary amenity buildings, guest lodging units or adjacent to hotel operational spaces shall be activated by photocell and shall remain operational from dusk to dawn.

Accordingly, the Proposed Action will not have a significant adverse impact on the community character of the Town of Cairo and is consistent with the Special Use Permit review criteria outlined in Section XI of the Town of Cairo Zoning Law. The proposed action complies with the following criteria:

- (a) Ensure the proposed use is compatible with adjoining properties and the natural environment in the area.
- (b) Adequacy of parking and use of shared parking where possible.
- (c) Accessibility to fire, police, and emergency vehicles.

- (d) Whether the property is suitable for the proposed use based upon the property's topography, vegetation, soils and hydrology, and, if appropriate, whether it can be adequately screened or buffered from neighboring properties and public roads.
- (e) Protect the natural environment to the greatest extent possible.
- (f) Protect neighboring properties from excessive dust, noise, odors, glare, release of harmful substances, and other nuisances.
- (g) Minimize traffic impacts by properly evaluating vehicular access and circulation, roadway widths, and placement. Traffic controls should be adequate to serve the special use and not excessively impact the overall traffic conditions present in the existing neighborhood.
- (h) Evaluate the need for pedestrian walkways and access and provide a safe and efficient pedestrian system.
- (i) Ensure the project design, including all principal and accessory structures, are compatible and harmonize with the existing neighborhood.
- (j) Use landscaping when necessary to act as a noise or visual buffer between the use and adjoining properties.
- (k) Ensure adequate storm water drainage measures are used.
- (l) Ensure water, sanitary waste, and sewage facilities are adequate for the proposed use.
- (m) Ensure there is sufficient room for snow removal storage.
- (n) Evaluate and ensure adequate fire protection measures are in place.

Based on the application materials including plans reports and presentations, the Proposed Action will not create any significant adverse environmental impacts, and a Negative Declaration is warranted under SEQRA.

EXHIBIT A
Blackhead Mountain Lodge
Submissions Index

2023.12.21 – Planning Board Site Plan Submission

1. Cover Letter with Narrative (12.21.2023)
2. Site Plan Application
3. Letter of Consent (Authorization)
4. Site Plan Set (12.21.2023)
5. EAF with appendices 12.21.2023

2024.02.16 – Planning Board Submission

1. Cover Letter (02.16.2024)
2. Architectural Sketches and Material Board (02.16.2024)
3. Site Plan Set (02.16.2024)
4. APPENDIX Q – Cross Sections and Viewshed Analysis (02.16.2024)
5. APPENDIX G.1 – Water & Wastewater Engineer Report (02.16.2024)
6. APPENDIX H.1 – Traffic Correspondence (02.16.2024)
7. APPENDIX R – Preliminary Engineering Report (02.16.2024)
8. APPENDIX O.1 – OPRHP Sign Off Letter (02.09.2024)

2024.03.25 – Planning Board Submission (Public Comments)

1. Cover Letter (03.25.2024, updated 03.28.2024, updated 04.03.2024)
2. Attachment A – Agency Letters
3. Attachment B – Written Public Comments (updated 03.28.2024)
4. Attachment C – Verbal Public Comments

2024.03.28 – Planning Board Interim Submission – Amended

1. Cover Letter (updated 03.28.2024)

2024.04.03 – Planning Board Interim Submission – Amended

1. Cover Letter (updated 04.03.2024)
2. Attachment A – Agency Letters
3. Attachment B – Written Public Comments (updated 04.03.2024)
4. Attachment C – Verbal Public Comments

2024.04.22 – Planning Board Submission

1. Cover Letter (04.22.2024)
2. Site Plan Application (amended 04.22.2024)
3. Consultant & Agency Response Letter (04.22.2024)
4. Public Comment Response Letter (04.22.2024)
5. Catania Mahon Rider Correspondence (04.19.2024)
6. Amended EAF Part 1 (04.22.2024)
7. Site Plan Set (04.22.2024)
8. APPENDIX E.1 – Town of Cairo Zoning Determination Letter (02.27.2024)
9. APPENDIX G.2 – Crawford Wastewater & Water Preliminary Report (04.22.2024)
10. APPENDIX H.2 – CME Traffic Report (04.22.2024)
11. APPENDIX I.1 – Soils Map (updated 04.16.2024)
12. APPENDIX L.1 – Ecological Solutions Correspondence (04.12.2024)

13. APPENDIX R.1 – Preliminary Engineering Report (amended 04.22.2024)
14. APPENDIX S – Weitzman Fiscal Impact Analysis (04.22.2024)

2024.06.03 – Planning Board Submission

1. Cover Letter (06.03.2024)
2. Public Comment Response Letter (06.03.2024)
3. Public Comments as of 05.02.2024

2024.07.01 – Planning Board Submission

1. Cover Letter (07.01.2024)
2. Lamont Memo response Letter (07.01.2024)
 - a. BHML Photos of Road Conditions
3. Public Comment Response Letter (07.01.2024)
 - a. Public Hearing Transcript and Sign In Sheet (06.13.2024)
4. Site Plan Set (07.01.2024)
5. SWPPP (07.01.2024)
6. EAF Part 1 (amended 07.01.2024)
 - a. EAF Part 1 Notes Addendum (07.01.2024)
 - b. EAF Part 1 Updated Table of Contents
 - c. APPENDIX G.3 – Well Evaluation Report (07.01.2024)
 - d. APPENDIX T – Agricultural Data Statement

2024.07.24 – Planning Board Submission

1. Cover Letter (07.24.2024)
2. Clarification Letter (07.24.2024)
3. APPENDIX T – Agricultural Data Statement (updated)
4. Part 1 EAF Amended Page 7 (07.22.2024)
5. SEQRA Review Binder (Documentation of all SEQRA materials to date as of 07.2024)

BINDER 1: SEQRA Review Documentation

TAB 1

- Site Plan Application, last amended April 22, 2024
- Cover Letter, submitted December 21, 2023
- Cover Letter, submitted February 16, 2024
- Cover Letter, submitted March 25, 2024
- Cover Letter, submitted April 3, 2024
- Cover Letter, submitted April 22, 2024
- Cover Letter, submitted June 3, 2024
- Cover Letter, submitted July 1, 2024

TAB 2

- EAF part 1, last amended July 1, 2024

TAB 3

- Lead Agency Resolution, dated January 4, 2024
- Agency Addresses for SEQRA Circulation
- Example Agency Response Letter for SEQRA Circulation
- January 4, 2024 Planning Board Agenda

- January 4, 2024 Planning Board Minutes

TAB 4

- Blackhead Mountain Lodge Public Hearing Notice, dated February 20, 2024
- Public Hearing Mailing Receipts
- Public Hearing Newspaper Advertisement Receipt
- Planning Board Venue Change Public Notice
- Public Hearing Dates
- March 7, 2024 Planning Board Agenda
- March 7, 2024 Planning Board Minutes
- March 7, 2024 Planning Board Text Conversion of Audio Recording
- Public Hearing Notice, dated March 15, 2024
- Public Hearing Mailing Receipts
- April 4, 2024 Planning Board Agenda
- April 4, 2024 Planning Board Minutes
- April 4, 2024 Planning Board Text Conversion of Audio Recording
- May 2, 2024 Planning Board Agenda
- May 2, 2024 Planning Board Minutes
- May 2, 2024 Planning Board Text Conversion of Audio Recording
- June 13, 2024 Planning Board Agenda
- June 13, 2024 Planning Board Minutes
- June 13, 2024 Planning Board Text Conversion of Audio Recording
- July 11, 2024 Planning Board Agenda
- July 11, 2024 Planning Board Minutes
- July 11, 2024 Planning Board Text Conversion of Audio Recording

TAB 5

- EAF Appendices Table of Contents
- Appendix A – Property Cards
- Appendix B – Site Plan
- Appendix C – Comprehensive Plan
- Appendix D – HRV Greenway and Heritage Area Maps
- Appendix E – Zoning Map
- Appendix E.1 – Cairo Zoning Determination Letter (02.27.2024)
- Appendix F – Wetland Delineation Report (12.21.2023)
- Appendix G – Water & Wastewater Daily Design Flows Report (12.21.2023)
- Appendix G.1 - Water & Wastewater Preliminary Report (02.16.2024)
- Appendix G.2 – Water & Wastewater Preliminary Report (04.22.2024)
- Appendix G.3 – Well Evaluation (07.01.2024)
- Appendix H – Preliminary Traffic Assessment (12.31.2023)
- Appendix H.1 – Traffic Route Assessment (02.16.2024)
- Appendix H.2 – Traffic Report (04.22.2024)

- Appendix I – Soil Map (12.21.2023)
- Appendix I.1 – Updated Soil Map (04.16.2024)
- Appendix J – Surface Water Features (12.21.2023)
- Appendix K – Flood Map (12.21.2023)
- Appendix L – Habitat Suitability Assessment (12.21.2023)
- Appendix L.1 – Significant Natural Communities Letter (04.12.2024)
- Appendix M – USFWS Species List (12.21.2023)
- Appendix N – Farmland Classification (12.21.2023)
- Appendix O – Phase 1A and 1B Report (12.21.2023)
- Appendix O.1 – OPRHP Sign Off Letter (02.09.2024)
- Appendix P – Hudson Scenic Areas (12.21.2023)
- Appendix Q – Cross Sections and Viewshed Analysis (02.16.2024)
- Appendix R – Preliminary Engineering Report (02.16.2024)
- Appendix R.1 - Preliminary Engineering Report – Revised (04.22.2024)
- Appendix R.2 – SWPPP (07.01.2024)
- Appendix S – Fiscal Impact Analysis (04.22.2024)
- Appendix T – Agricultural Data Statement – Revised (07.01.2024)

BINDER 2: SITE PLAN

CV-1	Cover Sheet
EX-1	Existing Conditions
LC-1	Lot Consolidation Plan
DM-1	Demolition Plan
OP-1	Overall Site Plan
SP-1 THRU SP-4	Site Plan
OG-1	Overall Grading / Drainage Plan
SG-1 THRU SG-4	Site Grading / Drainage Plan
OUP-1	Overall Utilities Plan
SUP-1 THRU SUP-4	Utilities Plan
OE-1	Overall Erosion & Sediment Control Plan
EC-1 THRU EC-4	Erosion & Sediment Control Plan
LL-0	Existing Conditions Illustrative
LL-1	Landscape Plan Overview
LL-2	Landscape Buffer Plan
LL-3	Landscape Buffer Plan
LLS-0	Landscape Key Plan
LLS-1 THRU LLS-3	Landscape Plan

BINDER 3: SITE PLAN

LP-1 THRU LP-5	Site Lighting Plan
CL-1	Construction Logistics Plan
OVT-1	Overall Truck Turning Plan
TT-1 THRU TT-4	Truck Turning Plan
CS-0	Cross Section Location Plan
CS-1	Perimeter Cross-Sections
CS-2	Perimeter Cross-Sections

CS-3	Perimeter Cross-Sections
PL-1 THRU PL-6	Plan Sheets (Roads / Drives)
PR-1 THRU PR-6	Profile Sheets (Roads / Drives)
DN-1	Site Details
DN-2	Stormwater Details
DN-3	Erosion Control Details
DN-4	Wastewater Details
DN-5	Water Details

BINDER 4: SWPPP

2024.11.25 – Planning Board Submission

1. Cover Letter (11.25.2024)
2. EAF Part 1 (updated 11.25.2024)
 - a. EAF Part 1 Notes Addendum (11.25.2024)
 - b. EAF Part 1 Updated Table of Contents (11.25.2024)
3. Site Plan Set (11.25.2024)
4. SWPPP (11.25.2024)
 - a. SWPPP Hydraulic Analysis Runoff Calculations (11.25.2024)
5. APPENDIX G.4 – Hydrogeologic Report (11.25.2024)
6. APPENDIX G.5 – Water Demand for Irrigation Memo

2025.01.27 – Planning Board Submission

1. Cover Letter (01.27.2025)
2. EAF Part 1 (amended 01.27.2025)
 - a. EAF Part 1 Notes Addendum (01.27.2025)
 - b. EAF Part 1 Updated Table of Contents (01.27.2025)
3. APPENDIX G.6 – Hydrogeologic Report (01.17.2025)

2025.02.05 – Planning Board Submission

1. Cover Letter (02.05.2025)
2. Hydrogeologic Report (revised 02.05.2025)