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July 1, 2022

Richard Onorati, II, Chairperson
80 Ridgebury Hill Road
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Subject: Comments on Dolsontown Corridor
 Draft Generic Environmental Impact Statement

Dear Mr. Onorati

CDM Smith, on behalf of the City of Middletown, have reviewed the Draft Generic Environmental Impact Statement (DGEIS) and its associated appendices (Appendix A through L), dated April 27, 2022, by Robert A. Stout Jr., Esq. of Whiteman Osterman & Hanna LLP, and Justin E. Dates, RLA of Colliers Engineering & Design, prepared for the Dolsontown Corridor located in the Town of Wawayanda, Orange County, New York. A summary providing a theme to CDM Smith's review commentary is provided below. A detailed review commentary list is provided in **Exhibit 1**.

Stormwater

- The proposed development is mixed commercial with industrial uses and therefore, is subject to industrial stormwater requirements, both from a permit requirement and an environmental impact perspective. The provided drawings and discussions do not appear to address pre-treatment where it will be necessary and appears to rely on best practices to minimize the pollutant load.
- Cumulative impacts and required mitigation to the stormwater system by the combined development does not appear to be addressed. The impacts were only addressed piecemeal on individual parcels. Downstream mitigation to decrease stormwater impacts from the combined pollutant load and an increase in peak stormwater capacity needs to be provided to protect the downstream infrastructure and the environment.

Water and Wastewater

- The provided water and wastewater needs for the proposed development do not appear to be sufficient. With regards to water supply, the fire water flows for the Marangi Solid Waste Management Facility in flow volume does not appear to be sufficient. The provided document also omits water delivery pressure. With regards to wastewater, the discussion on pre-treatment for the expected liquids generated from solid waste transfer activity appears to have been omitted.





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Traffic

- The conclusion of the traffic study indicates little to no impact while stating that improvements will be needed. While there are additional properties from each of the five lots that are being dedicated to the widening of Dolsontown Road right-of-way, presumably for additional lanes, the level of the required roadway infrastructure improvements that the applicant(s) are willing to make are vague.

Natural Resources

- The applicant **should** be required to evaluate if the project sites support vernal pool habitat.
- The applicant **should** provide wetland replication at a minimum ratio of 2:1 for the loss of 4,000 sf of federal jurisdictional wetland. There are no wetland replication design plans included in the DGEIS and its associated appendices.

Threatened and Endangered Species

- There are no direct comments regarding threatened and endangered species. The project area does not contain critical habitat for listed federal threatened or endangered species. The applicant had completed threatened and endangered species habitat assessments for all project sites and concluded that based on lack of suitable habitat there would be no adverse impacts to the following listed federal threatened or endangered species.

Solid Waste

- Critical design details regarding the Marangi Solid Waste Transfer Station are not clear, inconsistent, or have been omitted. Details such as, a firm design capacity, expected throughput, projected throughput, and materials to be handled should be provided in the summary document and reaffirmed within the support appendices. These details are critical to support the conclusion of overall development impact and inform the required needed utilities improvements.

Should you have questions, please feel free to contact me at KellyKF@cdmsmith.com.

Sincerely,

Keith F. Kelly, P.E.
Client Service Leader
CDM Smith Inc.

Exhibit 1 – Commentary List



Exhibit 1
Commentary List

#	Comment Provided by CDM Smith NY Inc on behalf of the City of Middletown
1	<p>On pdf page 2 of 9, in Appendix G, last paragraph states: "Potable water service will be provided via a water main that will connect to the Town's existing 12" main and extend down Dolsontown Road to the Dolsontown East Warehouse #1 parcel. The 1,800 gpm fire flow capability of the Town's system will be maintained." Typically, when discussing fire flow, a delivery pressure is also provided. A review of the DGEIS and Appendix G appears to be silent on the fire flow delivery pressure. With the proposed development, is the fire flow capacity of 1800 gpm maintained at the same delivery pressure? Please address fire flow delivery pressure within the document, cite the applicable NFPA requirements for the facility and confirm that the design conforms with applicable NFPA requirements.</p>
2	<p>The first paragraph of pdf page 4 of 9 in Appendix G states: "The potable water and wastewater generation rates from the Marangi facility are projected to be 2,476 gpd." It is unclear what is included in this projected gallons per day value. For example, a truck washing area is proposed on Page 24 of 65 in DGEIS. The statement provided on Page 4 of 9 in Appendix G also references "The Full Environmental Assessment Form, revised May 11, 2021, prepared by The Chazen Companies for details on the estimated Marangi water and sewer production rates." A review of the work performed by the Chazen Companies in Appendix E does not appear to include the proposed truck washing activities. Please provide clarity in these documents.</p>
3	<p>Pdf page 24 of 65 of the DGEIS discusses the Marangi Solid Waste Transfer Station that will include the transfer of municipal solid waste. The transfer of municipal solid waste typically results in leachate generation. A review of the DGEIS and the associated Appendix E does not appear to provide a plan for the dedicated collection and treatment of leachate. Discussion of the leachate quality, quantity and pretreatment, if needed, should be provided within the document.</p>
4	<p>The DGEIS with its associated appendices were reviewed against the SEQRA scoping document contained in Appendix I. On page 8 of 14 of the SEQRA scoping document, Chapter 1.C., requires the DGEIS to "Describe anticipated type of development being proposed including overview of project layout, size, and type of proposed structures (including materials, shapes and proposed colors), parking, loading, circulation, landscaping, lighting, signs, including materials and colors, and utilities." In reviewing the DGEIS and attached appendices, the discussion on the proposed structures, does not include the material and color. The document should have this level of information to better inform the citizen of the aesthetic impacts.</p>
5	<p>Pdf page 24 of 65 of the DGEIS, in the discussion of Phase 2 for the Marangi Solid Waste Transfer Station, discusses a "truck washing area." A review of Appendix E and Appendix G does not appear to address the water needs for a truck wash, nor provide a plan for the disposal of the truck wash water. A truck wash, depending on usage, may be result in significant water usage and a significant wastewater generator. The water supply needs and wastewater discharge associated, along with pretreatment of the wastewater, with the truck wash should be addressed within the document.</p>

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6	<p>The DGEIS with its associated appendices were reviewed against the SEQRA scoping document contained in Appendix I. On page 11 of 14 of the SEQRA scoping document, item 2.ii.b, requires the DGEIS to "Provide a calculation of fire flow requirements based on NFPA guidelines. Address whether any of the Projects will require fire water storage tanks and/or pumping facilities." This required calculation and review of the NFPA guidelines appears to have been omitted. Appendix G, which provides the discussion on water and wastewater needs, only states the available fire flow. Calculations of fire flow, along with requirements of fire water storage tank and/or pumping facilities should be addressed within the document.</p>
7	<p>The DGEIS with its associated appendices were reviewed against the SEQRA scoping document contained in Appendix I. On page 11 of 14 of the SEQRA scoping document, item 2.iii.c. requires the DGEIS to "Describe use of water conservation fixtures." This discussion of water conservation fixtures appears to have been omitted and should be corrected.</p>
8	<p>Will the proposed roadway of Dolsontown Road Right of Way widening include improvements to increase the weigh bearing capacity of the existing lanes, between 17M and McVeigh Road? Dolsontown Road is posted for 6-ton vehicles while typical Solid Waste transfer vehicles are typically filled to 20-tons. A review of the DGEIS, with focused review of the traffic study contained in Appendix F and separate traffic studies in other appendices does not appear to address the likelihood to structurally improve all of Dolsontown Road to support the proposed development. This should be addressed.</p>
9	<p>In Appendix E, pdf page 416 of 654, the Trip Generation section indicates there is no ITE Trip Generation data for a solid waste handling facility and the number of trips was estimated from details supplied by the applicant. How many total daily truck trips and vehicle trips is the solid waste handling facility (Phase 1 + Phase 2) expected to generate? Can truck and vehicle trip data be provided from an existing solid waste handling facility of similar size and be used to evaluate this project?</p>
10	<p>There are several aspects of the Marangi Solid Waste Management Facility that appears unclear. This comment addresses the design capacity and expected throughput. The DGEIS and associated appendices does not appear to indicate a size of the Solid Waste Transfer Station/Recycling Facility/Resident Drop Off in terms of waste throughput capacity or throughput range. Even though Appendix E provides a throughput capacity of 950 tons for the transfer station on pdf page 416 of 654 to provide a basis of estimate for the traffic volume, transfer facilities generally provide a projection of expected throughput to better inform and support the traffic volume conclusion and roadway design. In addition, the discussion also does not provide whether this transfer tonnage includes the expected activity from recycling, and resident drop off. Please provide greater clarity on the design capacity and the expected throughput for each facility/activity.</p>

#	Comment Provided by CDM Smith NY Inc on behalf of the City of Middletown
11	<p>There are several aspects of the Marangi Solid Waste Management Facility that appears unclear. This comment addresses material handling. On pdf page 23 of 65 of the DGEIS, under the heading "Marangi Solid Waste Facility" the proposed activity was "to construct and operate a solid waste management facility, which will include a transfer station and recycling facility." On pdf page 469 of 654 in Appendix E, under the heading "Project Description" states the following "The Transfer and Recycling Facility will process and transfer municipal solid waste (MSW), Construction and Demolition debris (C&D), and Industrial Waste (IW) for disposal, and package and transfer source separated Old Corrugated Containers (OCC) for further processing. Hardfill, brush, unadulterated wood, and metal from the C&D will be separated through simple floor sorting and transferred for further processing." While the traffic study discussion on pdf page 416 of 654 in Appendix E, under the subheading "E. Trip Generation" states "The transfer station is proposed to accept and process 950 tons per day (tpd) of MSW and C&D." The discussion of the materials to be handled appears to always include MSW, but not always C&D, recycling, or likely, wood waste. Several conclusions of the subsequent studies regarding the infrastructure improvements (water, wastewater, stormwater, traffic) to support the Marangi Solid Waste Management Facility do not appear to share the same or consistent project assumptions on material handling. This should be addressed.</p>
12	<p>This comment addresses the cascading effects of the lack of design and material handling for the Marangi Solid Waste Management Facility. Potable water demand, fire water demand, stormwater system, and wastewater characteristic and volume, and traffic characteristics are different based on the material handling and its associated throughput. It is typical to provide engineered systems to have a separate collection system for leachate from MSW in conjunction with pretreatment or a pump and haul system. If the system is to handle only white goods (typically recycling), such engineered provisions for leachate may not be required. Similarly, if the transfer station is to only accept commercial loads, then impact to traffic would be significantly different from a system that accepts both residential and commercial. Fire water demand for a MSW dedicated transfer station may require a separate dedicated pump system (which does not appear to be provided) to provide the necessary fire suppression while a system that only receives metals may be exempted. Noise and odor are also dependent on the material and throughput. Please provide clarity of the assumptions used that support the resulting conclusions on the environmental impact.</p>
13	<p>This comment concerns the provided drawings on pdf pages 4 and 5 of 654 of Appendix E and subsequent traffic discussion. It is typical for transfer stations to provide dedicated queuing for vehicles. Depending on the expected throughput of activity, transfer station, recycling, and resident drop off, as vehicles waiting for service can extend out into the main access road. The drawing does not appear to provide dedicated queuing lanes and if queuing is provided in a separate method (circulating around the parking areas for the Truck Maintenance). Please demonstrate that the expected queuing traffic from customers will not impact Dolsontown Road. And if vehicle queuing would impact Dolsontown Road, please provide the expected size and frequency of such impact to inform the extent of improvements to Dolsontown Road as appropriate.</p>

#	Comment Provided by CDM Smith NY Inc on behalf of the City of Middletown
14	<p>This comment is in regards to the stormwater related discussion on pdf pages 12 and 24 of 65 of the DGEIS. The DGEIS does not mention that the various warehousing facilities are subject to Sector P of the NYSDEC Multi-Sector General Permit for Stormwater Discharges from Industrial Facilities (Multi-Sector Permit) and only casually lists this permit as a requirement for the Marangi Solid Waste Facility (subject at least to Sectors N and P). As such, the DGEIS and associated facility designs should specifically describe the potential impacts of these types of industrial facilities and the specific measures that will be taken to satisfy permit requirements, particularly facility design details that minimize exposure of industrial activities to stormwater, that runoff/runoff from industrial material handling, transport, and storage areas will be controlled, that potential non-stormwater discharges from these activities will be prohibited (including potential spills and leaks of industrial materials), and that the facilities will ultimately be designed to control pollutants associated with industrial activities. Specific industrial activities on the Marangi Solid Waste Facility site listed in the DGEIS that require controls include the transfer/collection truck drop-off area (25,200 sq ft), the "shop" associated with the transfer station building (4,800 sq ft), the C&D recycling storage bins, the residential drop-off area, ingress/egress routes that will be used by trucks transporting solid waste, the truck maintenance shop (36,000 sq ft), the fabrication shop (12,000 sq ft), fueling station, and a roll-off storage area (0.5 acres). This should be addressed.</p>
15	<p>This comment is in regards to the stormwater related discussion on pdf page 12 of 65 of the DGEIS. In general, stormwater from industrial activities subject to the Multi-Sector Permit should be minimized and, where present, not co-mingle with other stormwater. If the co-mingling does occur, effective and appropriate stormwater treatment should be provided. The provided design does not appear to provide either stormwater minimization or co-mingling prevention. Treatment for stormwater "hotspots" is provided for the Dewpoint South, North, and East warehousing facilities (i.e., Appendices A, B, and C), however the DGEIS does not properly demonstrate that effective and appropriate stormwater treatment for stormwater from industrial activities is provided. Furthermore, no such "hotspot" treatment systems are identified for the Simon warehousing facility (Appendix D) or the Marangi Solid Waste Facility (Appendix E). The discussion should discuss methods to minimize stormwater and/or co-mingling prevention.</p>
16	<p>This comment is in regards to the stormwater related discussion on pdf page 12 of 65 of the DGEIS. Stormwater generated by industrial activities regulated under the Multi-Sector Permit appears to be directed to the bio-retention areas or the wet ponds proposed for this development. Some pollutants in stormwater from these industrial activities may not be effectively treated by the proposed bio-retention area or wet ponds. Specific pollutants of concern are the leaching liquid waste and solid waste associated with the Marangi Solid Waste Facility, unknown materials transported to/from or warehoused at all the other facilities, and various fluids associated with vehicle and equipment maintenance at all facilities. These pollutants should be identified and appropriate controls should be provided.</p>

#	Comment Provided by CDM Smith NY Inc on behalf of the City of Middletown
17	<p>This comment is in regards to the stormwater related discussion on pdf page 12 of 65 of the DGEIS, as well as the overall stormwater provisions contained in Appendices A through E. The DGEIS should address the cumulative impacts of all the proposed facilities. All these projects should be considered a "common plan of development" under the NYSDEC General Permit for Stormwater Discharges from Construction Activities (Construction Permit). Yet the DGEIS presents separate stormwater pollution prevention plans (SWPPPs) for each facility that do not address the cumulative impacts of this coordinated development effort. Indeed, the SWPPP for the Marangi Solid Waste Facility (found in Appendix E) only addresses the solid waste facility proposed for the site, without provisions for the truck maintenance facility. The DGEIS should address the cumulative impacts.</p>
18	<p>This comment is in regards to the stormwater related discussion on pdf page 12 of 65 of the DGEIS, as well as the overall stormwater provisions provided in Appendices A through E. The DGEIS, by addressing each property as a separate project, relies on standard, site-specific design criteria but does not evaluate the cumulative effects of all these projects on downstream flooding along Monhagen Brook, where the FEMA Flood Insurance Rate Map (FIRM) illustrates extensive flooding of buildings and roadways within the City of Middletown. Furthermore, it does not address the cumulative impacts of increased runoff on the geomorphic stability of Monhage Brook, which could result in excessive erosion and destruction of habitat. This should be addressed within the documents.</p>
19	<p>This comment is in regards to the stormwater related discussion on pdf page 12 of 65 of the DGEIS, as well as the overall stormwater provisions contained in Appendices A through E. The DGEIS needs to provide further justification and/or calculations demonstrating why it has not included a channel protection volume, designed to discharge the 1-year, 24 hour rainfall event over a 24-hour period, to protect against geomorphic degradation/stream erosion. There also appears to be guidance in the New York State Stormwater Manual that developments greater than 50 acres of impervious cover greater than 25% to perform a detailed geomorphic assessment so that an appropriate level of control can be identified. The cumulative size of all these projects appears to exceed this threshold. This should be addressed within the documents.</p>
20	<p>This comment is in regards to the stormwater related discussion on page 12 of 65 of the DGEIS, as well as the overall stormwater provisions contained in Appendices A through E. The DGEIS states that the "increased impervious area associated with Dolsontown roadway widening will be accommodated by providing peak flow detention and water quality treatment", yet it is not clear in the SWPPPs presented in Appendices A through E that this increase will be addressed in the proposed facilities. The peak flow detention and water quality treatment from the Dolsontown Road widening should be addressed within the documents.</p>

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21	<p>Pdf page 13 of 65, of the DGEIS, states that there will be "alteration of on-site stormwater runoff patterns, although there will be no increase in the amount and quality will be maintained through the use of NYSDEC stormwater management practices". While these practices are designed to minimize such increases, it would be inappropriate to say that there will be "no increase". The amount and quality of the stormwater increases needs to be quantified and mitigation methods should be addressed within the documents.</p>
22	<p>On pdf page 14 of 65 of the DGEIS, under the subheading, "Irreversible and Irrecoverable Commitment of Resources", has the following statement about the Marangi project site where ". . . a SF fabrication shop [sic] is proposed. The DGEIS needs to explain what will be fabricated, whether this fabrication operation is exposed to stormwater, and if it is subject to the Multi-Sector Permit.</p>
23	<p>On pdf page 14 of 65 of the DGEIS, the sentence referenced in the previous comment also mentions that the site will contain "driveways and drop-off areas, . . . a truck maintenance shop [sic], . . . fueling station, and roll-off storage area". Review of site plans in Appendix E do not show any features, required under the Multi-Sector Permit, to prevent exposure of these industrial activities to stormwater, segment runoff from these areas away from general site runoff, or otherwise prevent pollutant discharges, particularly illicit discharges. These measures should be addressed in the DGEIS and the SWPPPs.</p>
24	<p>On pdf page 14 of 65 of the DGEIS, under the subheading "Irreversible and Irrecoverable Commitment of Resources" states that: "the project has been designed to avoid impacting jurisdictional federal wetland". However, review of the SWPPP contained in Appendix E reveals direct discharges from the two wet ponds into these wetlands, as well as earth disturbance within 100 ft of wetlands. Item #14 of the completed NOI included in Appendix E does not state that these impacts will occur and should be corrected.</p>
25	<p>On pdf page 15 of 65 of the DGEIS, under the "Alternative Layout" section, setbacks are noted for the "front yard", but no mention is made of riparian setbacks/buffers along wetlands and Monhagen Brook. Such setbacks/wetlands should be considered under both the Construction Permit and the Multi-Sector Permit to protect the integrity of these natural resources. This should be addressed in the documents.</p>
26	<p>This comment concerns the overall DGEIS and all appendices. Temporary sediment basins are not listed as a control, but are required for projects of this magnitude. Appendices A through E do discuss using the various sites of post-construction controls as temporary sediment basins, but does not describe how these will be restored following construction to remove accumulated sediment. This should be corrected.</p>

#	Comment Provided by CDM Smith NY Inc on behalf of the City of Middletown
27	<p>This comment concerns the drawings provided on pdf page 4 and 5 of the 654 of Appendix E. There are additional facilities shown on these drawings that are not discussed in the DGEIS in terms of obtaining a Industrial Stormwater Multi-Sector Permit. These additional facilities may have activities considered to be industrial and will require control under the Multi-Sector Permit. At a glance, these activities includes the recyclable material storage permit (exposure to stormwater, runoff) and fuel tanks (proper containment facilities). This need should be addressed in the documents.</p>
28	<p>This comment concerns the drawings provided on pdf page 4 and 5 of the 654 of Appendix E. Bioretention areas - no pretreatment is shown for these areas, which are subject to rapid clogging and failure if coarse sediment and debris are not effectively managed at the inlet. This should be corrected.</p>
29	<p>This comment concerns the drawings provided on pdf page 4 and 5 of the 654 of Appendix E. Runoff from the western portion of the site is conveyed to the eastern portion, where it enters a wet pond that discharges to a small tributary along the eastern boundary of the project. Such a diversion of drainage from one watercourse to another is likely to result in flooding and/or destabilizing erosion that must be addressed or avoided. Also, this east Wet Pond is only partially constructed during Phase 1, however Appendix E does not explain how it is possible to expand a wet pond during Phase 2 while remaining functional for Phase 1 runoff. This should be addressed.</p>
30	<p>This comment concerns the drawings provided on pdf page 4 and 5 of the 654 of Appendix E. HDPE is specified for the storm drain pipes, which appear to be 2.5 ft below final grade of pavement. Appendix E should demonstrate that these shallow HDPE pipes can withstand heavy truck traffic (up to 20 tons) without failure, and will function properly without freezing during winter conditions.</p>
31	<p>Table 2 - Soil Type, on pdf page 13 of 654 of Appendix E, lists Mardin gravelly silt loam soil as both hydrologic soil group (HSG) D and "moderately well drained". This seems to be inconsistent, but appears to relate to high groundwater rather than lack of infiltration capacity. The SWPPP should discuss implications of this soil to support both bioretention (which requires some vertical separation from groundwater to not become saturated) and the adjacent wet pond (which appears to be below the water table and thus able to retain a permanent pool.)</p>
32	<p>A review of the SWPPP contained in Appendix E reveals a numerical inconsistency. The calculation of the area disturbed refers to 7.1 acres or 7.8 acres. Water quality, quantity, and stormwater treatment sizing appears inconsistent. If the values refer to different definitions, the document should be corrected.</p>
33	<p>Pdf page 114 of 654 of Appendix E, contains the information regarding the notice of intent (NOI) for coverage under Stormwater General Permit for Construction Activity. Item 7 as presented on page 114 of 654 states that the Marangi Solid Waste Transfer Station is not a phased project. The information provided in the DGEIS and Appendix E extensively discusses a phased approach. Was the information provided in the NOI in error? Corrections may be necessary.</p>

#	Comment Provided by CDM Smith NY Inc on behalf of the City of Middletown
34	Pdf page 114 of 654 of Appendix E, contains the information regarding the notice of intent (NOI) for coverage under Stormwater General Permit for Construction Activity. Item 9 as presented on page 114 of 654 states the nearest surface waterbody is a stream, however the site plans clearly show that the wet ponds will discharge to wetlands. Furthermore, Item 14 of the NOI states that the project will not disturb soils within 100 feet of a wetland, while the site plan clearly shows that it will. These inconsistencies should be addressed in the document.
35	What size/type/weight of trucks will be entering and leaving the Marangi Solid Waste Management Facility? Trucks going through a Solid Waste Management Facility, a warehouse in this instance, are not equivalent to the system of trucks expected at a warehouse with loading docks. Based on a review of the traffic study in both Appendix E and Appendix F, this information appears to be absent and should be provided.
36	In Appendix E Capacity Analysis, on pdf page 420 of 654, in Section E, Capacity Analysis, a statement is made that <i>"Traffic generated by the proposed project will noticeably increase delays on the westbound in the PM peak hour as compared to the No-Build condition. Minor signal changes of 1-2 seconds will mitigate the impacts of the project's traffic."</i> While capacity analysis may indicate otherwise, in reality, timing changes of 1-2 seconds will have no measurable impact on the operation of the traffic signal. Is "project" referring to the entire development or just the Marangi property? This should be addressed in the document.
37	In subsection "V. Summary and Conclusion" on pdf page 23 of 463, in Appendix F. Just looking at the AM & PM peak hour impacts on the 17M/Dolsontown corridor is a very narrow view of the developments impact. Overall the development is adding approximately 6,600 daily vehicle and 550 truck trips to/from a one mile section of Dolsontown Road. Including Saturday and Sunday, there are approximately 19,000 weekly vehicles and an undetermined number of truck trips (The ITE Trip Generation Handbook did not have truck data for Saturday or Sunday). The study is very vague on what roadway improvements the Development is willing to make. What specific roadway/traffic signal improvements are proposed by the developer to mitigate the added traffic from the development?
38	Dolsontown Road currently has a posted speed limit of 45 MPH. In subsection "V. Summary and Conclusion" on pdf page 23 of 463, in Appendix F, states that <i>"an evaluation of the horizontal and vertical alignment suggests a posted speed in the range of 30-35 MPH would be more appropriate once certain changes in roadway superelevation were introduced."</i> Why is the development not making the necessary roadway improvements to keep the existing posted speed limit of 45 MPH?
39	Based upon review of Appendix F, there does not appear to be mention of whether the three signalized intersections along 17M are coordinated, either closed loop system or TOD plans. Was there any consideration given to evaluating whether this corridor would operate better as a coordinated system?

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40	In Appendix F, pdf pages 4 thru 23 of 463, the term "development" is used interchangeably between the DGEIS properties and "several proposed developments in the area". It is not always clear what development the study is referencing? This also relates to understanding which development(s) are responsible for roadway improvements? Clarification should be provided.
41	The Stormwater Pollution Prevention Plans (SWPPPs) in Appendices A through D state that "enhanced erosion control measures" have been included to address "more than 5 acres of soil disturbance at one time". The SWPPPs should better define what these "enhanced erosion control measures" are and their effectiveness for each site.
42	Appendix G is titled "Sanitary Sewer and Water Distribution System Engineering Report." Appendix G does not provide a minimal description of the wastewater system. At a minimum, discussion of pretreatment, quantity and quality for the wastewater to be generated from the anticipated activities should be addressed within the documents.
43	Evaluation of whether the project sites support vernal pool habitat should be addressed.
44	The applicant should provide wetland replication at a minimum ratio of 2:1 for the loss of 4,000 sf of federal jurisdictional wetland. There are no wetland replication design plans included in the DGEIS package.