



**COUNTY OF ROCKLAND
DIVISION OF ENVIRONMENTAL RESOURCES**

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May 11, 2010

Michael L. Klein, Esq.
Town Attorney
Town of Ramapo
237 Route 59
Suffern, New York 10901

RE: Project Grand Slam Baseball Fields

Dear Mr. Klein:

We appreciate the opportunity to provide comments on recently submitted DEIS for the above referenced project. The following comments are in addition to our preliminary comments provided to the Town of Ramapo on February 25, 2010.

The project site is adjacent to the 272-acre Samuel G. Fisher Mount Ivy Environmental Park. The park protects the largest freshwater wetland in Rockland County (NYSDEC Wetland TH-16), referred to as the Mount Ivy Swamp, which is the headwaters for the Minisceongo Creek Watershed. The wetland area in the park extends to the northwest corner of the project site. The project site contains a significant perennial stream that drains into the wetland, which serves as the headwaters for the south branch of the Minisceongo Creek, terminating in the Hudson River in the Town of Haverstraw.

Due to the sensitive environmental features found on portions of the site and adjacent parkland we encourage the Town to carefully consider the impacts of construction activities and the eventual operation of the stadium to the adjacent property owners.

Leadership in Energy and Environmental Design (LEED).

As we had recommended in our preliminary comments on the Scoping Document, we strongly encourage the Town to consider constructing a LEED-certified stadium. The most common green initiatives in the LEED certification the Town should consider are:

- ✓ Using synthetic turf for the playing surface to reduce the need for irrigation, which will save in the millions of gallons of water annually and eliminate the need for pesticides and fertilizer use.
- ✓ Utilizing bio-retention stormwater systems to control stormwater runoff.
- ✓ Construct Rain Gardens on the perimeter of impervious surfaces.
- ✓ Preserve riparian buffers along the stream bank located on the site.
- ✓ Minimize the extent of managed turf on the outside of the facility.
- ✓ Exclude all uses of pesticides and fertilizers containing phosphorus for any turf maintenance.
- ✓ Use recycled materials in the construction of the stadium.
- ✓ Recycle as much of the construction waste as possible.
- ✓ Construct a waste water system utilizing low flow plumbing fixtures and waterless urinals.
- ✓ Reuse "grey water" for irrigation purposes.
- ✓ Reduce potable water use.
- ✓ Use high efficiency field lighting.
- ✓ ~~Minimize to the maximum extent as practicable the footprint of the stadium and surrounding infrastructure.~~
- ✓ Eliminate the use of road salt for parking areas and roadways in the winter months when the stadium is not in use.

General Concerns:

Protection of Sensitive Resources – Although the Stadium will be located on the upland portion of the site, the potential for impacts to the surrounding wetlands and perennial stream are very high. The perennial stream is a branch of the Minisceongo Creek draining a watershed area originating from the Dr. Yeager Health Center. As with any perennial stream it is sensitive to physical changes to drainage patterns and removal of vegetation. It is therefore extremely important to maintain a significant riparian buffer on both sides of the stream. At the very minimum, a 100-foot undisturbed buffer should remain on both sides of the stream.

On Site Drainage – The potential impacts to the wetlands found both on the project site and adjacent wetlands is significant. The site plans proposed to capture the majority of the site runoff in open detention basins. The plans are unclear as to the drainage patterns on the site and should be more clearly defined. To maximize the buffer area to the park and reduce the amount of forested area to be cleared, drainage storage systems should be installed under the parking areas. This will alleviate the need for above ground retention basins, which are costly to maintain and require additional areas of the site to be cleared of vegetation and excavated. As we have previously recommended, pesticides, fertilizers and salt should be prohibited for use on the grounds and parking areas. All of these compounds will migrate into the adjacent wetlands and have a negative impact.

Lighting - The light towers for the stadium will impact the wildlife in the park. Being the largest wetland swamp in the county, there is an abundance of wildlife, which can be disoriented or repelled by the light pollution from the stadium. The light tower heights should be minimized to protect the wildlife within the park. Light shields should be installed to block any excess light directed towards the park.

Noise Pollution – We recommend that the proposed fireworks display at the conclusion of each game be eliminated. Many species of wildlife are very sensitive to noise pollution and the fireworks display can have a negative impact to the wildlife. The fireworks will also impact the residential areas in the proximity of the stadium.

Specific Concerns:

- We would like to see more detail on the detention/water quality basins for the entire site. As recommended previously we encourage using underground stormwater detention systems.
- In the Appendix F – Hydrology Report, under “Engineering Methodology”, it does not state what the outlet will be for the detention/water quality basin (P-1 Pond) or for the two smaller water quality basins. Need to know outlets for these basins.
- In the Appendix F – Hydrology Report, under “Engineering Methodology”, it states: “All drainage area delineations and any changes from existing to proposed conditions are indicated on Existing and Proposed Drainage Maps provided in the Appendix.” We did not observe these maps in the hard copy of the Appendix, but did find maps D-1 and D-2 in the Appendix on the CD. For those who might just be reviewing a hard copy of the Appendix, they would not be able to see Maps D-1 and D-2. Map D-2 is in the DEIS on page 35, but it is a small version and difficult to view.
- On Map 3- “Grading, Drainage and Utility Plan”, there is shown one outlet for the smaller detention/water quality basins in the north east corner of the property (the blue section on Map D-2), but there is no outlet shown for the (P-1 Pond) nor for the smaller detention/water quality basins in the south west corner of the property (the pink section on Map D-2). Need to know the outlets for these basins.
- On Map 3 – “Grading, Drainage and Utility Plan”, for the detention/water quality basin (P-1 Pond) as stated above, we do not see an outlet structure, in addition, there appears to be a weir and maybe a sand filter (a shaded box on the slope of structure), but it’s not clear on Map 3 what it is. We need more explanation for this water quality basin, how it will operate and its’ outlet.
- On Map 3 – “Grading, Drainage and Utility Plan”, the large detention basin (P-1 Pond) shown on the map is very close to the stream centerline, it looks to be less than 30 feet from the stream centerline to the beginning of the large detention basin (P-1 Pond). There is concern that this basin (P-1 Pond) is too close to the stream.
- Also on Map 3- “Grading, Drainage and Utility Plan”, it is not clear the direction of the flow from stormdrains to detention/water quality basins. One can assume based on the topographic lines, but flow patterns should be more clearly presented.


- On page 34 of the DEIS it states: "Detention facilities will be located outside of all wetlands and floodplains." We would like to see a similar map shown on page 29 of the DEIS to include an overlay of the proposed development (right now that map just shows the floodplain with no development overlay). We believe a map such as this, might show that two of the detention/water quality basins (the large detention basin (P-1 Pond) and the two smaller basins in the north east corner of the property) are actually in the floodplain.
- Map 14 – "Cross Section": We would like to see another map generated that shows the cross section through the detention basins.
- On page 74 of the DEIS, there are only two "Alternatives to the Proposed Project". We would suggest at least one or maybe two more alternative sites considered. The reasons to have more alternative sites considered are:
 - For the Town of Ramapo to receive as much financial benefit, it might make sense to analyze an alternative site in a more populated part of the Town of Ramapo so that patrons could then shop and eat at local restaurants before and after ball games and events. The current ballpark proposed site location has limited shopping or restaurant opportunities nearby.
 - Large tour buses are not allowed on the Palisades Parkway and so tour buses coming to and leaving the ballpark will have to drive on the smaller county and town roads. We would encourage an alternative location analyzed, which includes a site that would be closer to highways (the NYS Thruway).
 - According to the *New York State Stormwater Management Design Manual, Chapter 9, Redevelopment Projects*, it states, "Redevelopment of previously developed sites is encouraged from a watershed protection standpoint because it often provides an opportunity to conserve natural resources in less impacted areas by targeting development to areas with existing services and infrastructure." We would encourage your DEIS to include an analysis of an alternative site that might be vacant or abandoned (old office space, old retail, etc.); considering a redevelopment site rather than destroying a wooded area (where the ball field is currently being proposed) is encouraged.
- Encourage two-story parking; the smaller the parking foot print the better for the environment, less impervious surface area. Encourage pervious pavers or porous pavement where possible.
- Encourage bioretention filtering systems for the parking lot sheet flow; see *Chapter 6, Filtering Systems* in the *New York State Stormwater Management Design Manual*. Also encourage rain gardens and educational displays where feasible.
- Community Character: This part of the Town of Ramapo is still quite rural, there are plant nurseries and the Orchards of Concklin along Route 45.
- The SWPPP (the Stormwater Pollution Prevention Plan), Construction NOI (Notice of Intent) is currently on the site for the land that was recently cleared in the north east part of the parcel, which will be used as an auxiliary parking area. According to: 6 NYCRR Part 617 State Environmental Quality Review (SEQR). [Statutory authority: Environmental Conservation Law Sections 3-0301(1)(b), 3-0301(2)(m) and 8-0113]. §617.3 General rules, it states: "(a) No agency involved in an action may undertake, fund or approve the action until it has complied with the provisions of SEQR. A project sponsor may not commence any physical alteration related to an action until the provisions of SEQR have been complied with." Please ensure all permits are obtained by regulating agencies prior to any additional land clearing.

The proposed baseball stadium offers a wonderful recreational venue for our residents. The incorporation of green building designs provides a great opportunity to address many of the environmental issues that will be raised during the review of the DEIS.

We look forward to further review of the design plans in the near future.

Thank you.

Sincerely,



Division of Environmental Resources

R. Allan Beers

Coordinator of Environmental Resources

Mary Hegarty

Rockland County Environmental Management Council

Michael DiMola

Parks Operations Manager

- C: Scott Vanderhoef, County Executive
- Rockland County Park Commission
- Rockland County Planning Department
- Rockland County Office of Emergency Services
- Rockland County Highway Department