

BUFFALO
SEWER AUTHORITY

ATTACHMENT C-3

Full Environmental Assessment Form
Part 3 - Evaluation of the Magnitude and Importance of Project Impacts
and
Determination of Significance

Part 3 provides the reasons in support of the determination of significance. The lead agency must complete Part 3 for every question in Part 2 where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.

Based on the analysis in Part 3, the lead agency must decide whether to require an environmental impact statement to further assess the proposed action or whether available information is sufficient for the lead agency to conclude that the proposed action will not have a significant adverse environmental impact. By completing the certification on the next page, the lead agency can complete its determination of significance.

Reasons Supporting This Determination:

To complete this section:

- Identify the impact based on the Part 2 responses and describe its magnitude. Magnitude considers factors such as severity, size or extent of an impact.
- Assess the importance of the impact. Importance relates to the geographic scope, duration, probability of the impact occurring, number of people affected by the impact and any additional environmental consequences if the impact were to occur.
- The assessment should take into consideration any design element or project changes.
- Repeat this process for each Part 2 question where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.
- Provide the reason(s) why the impact may, or will not, result in a significant adverse environmental impact
- For Conditional Negative Declarations identify the specific condition(s) imposed that will modify the proposed action so that no significant adverse environmental impacts will result.
- Attach additional sheets, as needed.

Please see attached Significance Statement

Determination of Significance - Type 1 and Unlisted Actions

SEQR Status: Type 1 Unlisted

Identify portions of EAF completed for this Project: Part 1 Part 2 Part 3

Upon review of the information recorded on this EAF, as noted, plus this additional support information

Please see attached significance statement

and considering both the magnitude and importance of each identified potential impact, it is the conclusion of the Buffalo Sewer Authority _____ as lead agency that:

A. This project will result in no significant adverse impacts on the environment, and, therefore, an environmental impact statement need not be prepared. Accordingly, this negative declaration is issued.

B. Although this project could have a significant adverse impact on the environment, that impact will be avoided or substantially mitigated because of the following conditions which will be required by the lead agency:

There will, therefore, be no significant adverse impacts from the project as conditioned, and, therefore, this conditioned negative declaration is issued. A conditioned negative declaration may be used only for UNLISTED actions (see 6 NYCRR 617.7(d)).

C. This Project may result in one or more significant adverse impacts on the environment, and an environmental impact statement must be prepared to further assess the impact(s) and possible mitigation and to explore alternatives to avoid or reduce those impacts. Accordingly, this positive declaration is issued.

Name of Action: BSA CSO053_5.2 Edison Martha Offline Storage Tank

Name of Lead Agency: Buffalo Sewer Authority

Name of Responsible Officer in Lead Agency: Rosaleen B. Nogle, PE, BCEE, PMP

Title of Responsible Officer: Principal Sanitary Engineer

Signature of Responsible Officer in Lead Agency:

Date:

Signature of Preparer (if different from Responsible Officer)

Date:

For Further Information:

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For Type 1 Actions and Conditioned Negative Declarations, a copy of this Notice is sent to:

Chief Executive Officer of the political subdivision in which the action will be principally located (e.g., Town / City / Village of)

Other involved agencies (if any)

Applicant (if any)

Environmental Notice Bulletin: <http://www.dec.ny.gov/enb/enb.html>

Full Environmental Assessment Form

Part 3 – Evaluation of the Magnitude and Importance of Project Impacts and Determination of Significance

Buffalo Sewer Authority – Edison Martha Offline Storage Tank

Impacts

The following impacts were identified on the FÉAF Part 2.

1. Impact on Land

Analysis

The 72-month construction phase of the project requires the excavation of approximately 46,000 cubic yards of native soil for the storage tank installation and the disruption will be localized to the proposed 2-acre construction site. The excavated material will be used as backfill once installation is complete and any excess soil will be disposed of according to regulations at an authorized facility. This level of disturbance could lead to increased erosion potential and changes in drainage patterns. Additionally, excavation activities may result in temporary sedimentation impacts to surrounding areas, particularly if precipitation events occur during construction. The site will experience heavy machinery operation, compaction, and disturbance.

Mitigation Measures

To mitigate potential impacts on land, erosion and sediment control measures will be implemented to prevent soil displacement and sediment transport. Silt fences, stabilized construction entrances, straw wattles, and erosion control blankets will be used where necessary, and all disturbed areas will be stabilized promptly with gravel or temporary vegetation following construction. Additionally, stormwater management best practices will be employed to minimize runoff. Proper grading techniques will be used to direct runoff away from sensitive areas and to prevent pooling.

Impact

With proper mitigation, the impact on land will be moderate but temporary. Given the limited scale of land disturbance, the reuse of excavated material, and the incorporation of erosion control and stormwater management strategies, the proposed project is not expected to result in significant adverse impacts on land. Any potential effects will be temporary and localized, and mitigation measures will be in place to ensure that soil stability and drainage patterns are maintained throughout the project's implementation.

11. Impact on Open Space and Recreation

Analysis

The project is located within Roosevelt Playground, which is an existing public recreational area. The construction activities will temporarily reduce available park space and may limit public access to certain areas. The presence of construction equipment, fencing, and excavation activities will disrupt the usability of this portion of the park for the duration of the 72-month construction period. Although the tank will be buried, the temporary loss of recreational space and the long construction timeline could be a concern for park users.

Mitigation

To minimize the impact on recreation, construction fencing and signage will be used to clearly delineate work zones and maintain public safety. Where feasible, alternative recreational space may be provided in coordination with local authorities. Upon project completion, the site will be restored with appropriate landscaping and surface treatments to ensure that public access and recreational use can resume.

Impact

The impact on open space and recreation will be moderate to significant and long-term but not permanent. While the restriction of public access for six years is a considerable disruption, the impact is not permanent since the park will be restored following construction. However, the long duration of the project amplifies the impact, making it more substantial than a typical short-term construction project.

13. Impact on Transportation

Analysis

The construction of the underground storage tank and associated sewer infrastructure will temporarily impact transportation in the surrounding area, particularly near the intersection of Edison Avenue and the Kensington Expressway. Construction activities will require the staging of equipment and materials, excavation work, and periodic utility connections within or adjacent to the public right-of-way. These activities are expected to disrupt normal traffic patterns, potentially leading to lane closures, detours, and reduced roadway capacity during certain phases of the 72-month construction schedule.

In addition to vehicular traffic, pedestrian pathways and walking routes—especially those leading to and through Roosevelt Playground and nearby schools—will be impacted. Access restrictions, construction fencing, and equipment movement may require rerouting or temporary closure of sidewalks and pedestrian corridors, which could inconvenience park users and school children attending the nearby Charter School for Inquiry.

Mitigation:

Traffic and pedestrian impacts will be mitigated through the implementation of a comprehensive Maintenance and Protection of Traffic (MPT) plan. This plan will include clear signage, temporary pedestrian walkways, detour routes, flagging operations where necessary, and coordination with local transportation agencies and school officials to ensure safe access around the construction zone. Efforts will be made to schedule disruptive work during off-peak hours or school recess periods, where feasible, to reduce impacts on daily routines.

Impact:

The impact on transportation will be moderate and temporary, limited to the duration of the construction period. Upon completion of the project, no long-term or permanent transportation impacts are expected. Normal traffic patterns and pedestrian access will be restored, and there will be no new infrastructure above grade that would interfere with circulation or mobility in the area.

15. Impact on Noise, Odor, and Light

Analysis

Construction activities will generate noise from heavy equipment, excavation, and material transport, which may affect nearby residents and park visitors. The prolonged 72-month construction period could lead to extended exposure to noise impacts. Temporary lighting may also be used for construction work during early morning or evening hours, potentially affecting nearby properties.

Odor impacts are expected to be moderate and recurring based on the tank's operation. The storage basin will activate approximately 45 times per year, with the outlet valve closed for 30 of those times, restricting flow for an average of 15 hours per occurrence. During these times, odors may be emitted from above-grade hatches or manholes due to the nature of the stored contents. Given that the Charter School for Inquiry is only 80 feet from the nearest above-grade feature, there is a potential for noticeable odor impacts on students and staff. The frequency and duration of odor events raise concerns about the potential for recurring air quality issues, particularly during warmer months when higher temperatures may intensify odors.

Mitigation

Noise mitigation measures will include compliance with local noise ordinances, limiting work hours to daytime periods, and using equipment with noise-reduction features. Light pollution will be minimized by directing construction lighting downward and using

shielded fixtures. As the tank is enclosed, there should be no ongoing odor concerns once construction is complete.

Odor control measures will be evaluated and implemented as needed during final design to mitigate potential air quality impacts. Potential mitigation strategies may include activated carbon filtration, biofilters, or chemical treatment systems for odor control at key emission points. Proper ventilation design and periodic maintenance will also help minimize long-term odor concerns. If odor impacts prove to be persistent, additional mitigation efforts, such as enclosure enhancements or additional air treatment systems, may be required.

Impacts

The impact on noise will be significant and long-term but not permanent, persisting for the duration of the 72-month construction phase but ceasing upon project completion. Light pollution will be moderate and temporary, occurring only during construction activities. Odor impacts will be moderate to significant and recurring, depending on the final design and effectiveness of mitigation measures. The proximity of the Charter School for Inquiry and other sensitive receptors increases the importance of implementing effective odor control strategies. While odors will not be constant, the recurring nature of the storage tank's activation means that odor management will be a key long-term consideration for project success.

16. Impact on Human Health

Analysis

During construction, potential air quality impacts from dust, diesel emissions, and airborne particulates may affect nearby residents and park users. If not properly managed, prolonged exposure to construction dust and emissions could pose respiratory risks, particularly for sensitive populations such as children, the elderly, and individuals with pre-existing respiratory conditions. Additionally, excavation may encounter contaminated soils, particularly given the urban nature of the site and the presence of existing underground utilities and infrastructure. Construction activities also pose safety risks, including hazards associated with heavy machinery operation, excavation, and material handling.

In the long term, the project is expected to have significant **positive** impacts on human health by reducing combined sewer overflows (CSOs) into the Scajaquada Tunnel. The reduction of CSO discharges will improve water quality, reducing the risk of waterborne illnesses and improving environmental conditions for both residents and aquatic ecosystems.

Mitigation

Dust control measures, including water spraying, dust suppression barriers, and covering of stockpiled materials, will be implemented to minimize airborne particulates. Construction vehicles and equipment will comply with emissions standards, and idling will be restricted to reduce diesel emissions. If contaminated soil is encountered, it will be handled and disposed of according to environmental regulations, with appropriate safety protocols in place. Strict adherence to Occupational Safety and Health Administration (OSHA) and local construction safety standards will ensure worker and public safety.

Impact

The impact on human health during construction will be moderate and temporary, with proper mitigation measures in place to minimize exposure to air pollutants and safety hazards. In the long term, the project will have a significant beneficial impact, improving public health through reduced CSO discharges and enhanced water quality.

18. Impact on Consistency with Community Character

Analysis:

The project will temporarily alter the character of Roosevelt Playground, a valued public park and recreational space, by converting a portion of it into an active construction zone for the 72-month duration of the project. The presence of fencing, heavy machinery, excavation activities, construction staging areas, and equipment storage will create a visual and functional disruption to the park's established role as a quiet, open space for recreation, relaxation, and community interaction. The community character of the surrounding neighborhood—defined in part by access to and use of this public park—will be temporarily diminished during construction.

The park serves not only local residents but also students and staff at the nearby Charter School for Inquiry, who rely on it for outdoor space and educational activities. The extended duration of the construction period heightens the potential impact, as the disruption will be experienced over multiple seasons and school years. While the project itself is consistent with broader community goals for improving water quality and public health, the temporary loss of this park space contrasts with the community's expectations for continued access to green space.

Mitigation:

To mitigate the impact on community character, the project will include clear signage, fencing, and visual screening to minimize the appearance of construction-related activities from adjacent areas. Coordination with local officials, park stakeholders, and the school community will help identify opportunities to offset the temporary loss of

space—such as improved access to nearby parks, or enhancements to unaffected portions of Roosevelt Playground. Upon completion of construction, the project site will be fully restored with appropriate landscaping, turf, and recreational features to match or exceed the pre-existing condition.

In the final stages of design and restoration, community input may be solicited to ensure the rehabilitated space reflects neighborhood priorities and recreational needs.

Level of Impact:

The impact on consistency with community character will be moderate to significant and temporary, given the park's central role in neighborhood life and the extended duration of construction. However, the impact is not permanent, and restoration of the site to a public recreational use consistent with its original purpose will help reestablish the community character post-construction.

Determination of Significance

The proposed project involves the construction of a 2.61-million-gallon underground storage tank and associated infrastructure within Roosevelt Playground. The project will require the excavation of approximately 46,000 cubic yards of soil and will include a 72-month construction period. Given the scale and duration of the work, the project will have temporary but significant impacts on land, recreation, transportation, noise, light, human health, and community character during construction. Additionally, the operation of the storage tank introduces potential recurring odor impacts, particularly due to its proximity to the Charter School for Inquiry, located approximately 80 feet from the nearest above-grade feature.

Impacts to land will be mitigated through erosion and sediment controls, proper backfilling, and restoration of the site post-construction. The impact on open space and recreation is substantial due to the prolonged loss of public park space, but the area will be restored to its recreational function upon project completion. Noise and light impacts will be significant but temporary, managed through adherence to local ordinances and best practices. Odor impacts could recur approximately 45 times per year, with potential to affect nearby receptors, including the adjacent school; odor control measures will be evaluated and implemented during final design.

Transportation impacts are expected during construction, including disruptions to traffic patterns and pedestrian pathways near the intersection of Edison Avenue and the Kensington Expressway. These impacts will be temporary and mitigated through a Maintenance and Protection of Traffic (MPT) plan, including detour signage, pedestrian safety measures, and coordination with local agencies.

Community character will be temporarily affected due to the transformation of Roosevelt Playground into an active construction zone. The presence of fencing, equipment, and construction activity will diminish the park's aesthetic and functional role in the neighborhood. However, this impact will be temporary, and the site will be fully restored for recreational use once construction is complete.

Despite these temporary disruptions, the project provides substantial long-term environmental benefits, including a reduction in combined sewer overflows (CSOs) to the Scajaquada Tunnel, improved water quality, and enhanced public health protections. With implementation of the identified mitigation measures, the potential adverse effects of the project will be minimized to the extent practicable.

Negative Declaration

Based on the environmental assessment, the project **will not result in significant adverse environmental impacts that cannot be mitigated**. The temporary disruptions during construction—including impacts on land, recreation, transportation, noise, light, air quality, and community character—will be effectively managed through standard construction and environmental best management practices.

While odor emissions during operation have the potential to affect nearby receptors, including the Charter School for Inquiry, the final design will incorporate necessary odor control measures to address these impacts to an acceptable level.

Given that the project will ultimately result in long-term environmental and public health benefits by reducing CSO discharges, improving water quality, and supporting regional stormwater management goals, and because all adverse effects will be temporary and mitigated appropriately, the Buffalo Sewer Authority is issuing a **Negative Declaration** pursuant to the State Environmental Quality Review Act (SEQR). **No significant adverse environmental impacts are anticipated** that would warrant the preparation of an Environmental Impact Statement (EIS).