



November 16, 2022

Martin E. Voss, Chairman
ONONDAGA COUNTY PLANNING BOARD
1100 Civic Center
421 Montgomery Street
Syracuse, NY 13202

RE: Twin Shores, LLC – Twin Lakes Commercial Project
5440 North Burdick Street
Proposed Site Plan & Subdivision Review
Town of Manlius, Onondaga County
OCPB RESOLUTION RESPONSE (CASE # S-22-66)
TDK Project No: 2021054

Dear Mr. Voss:

In anticipation of an additional project review by County Planning regarding a proposed commercial development of approximately 9 acres of the above-reference property and in response to your Board's prior recommendations to the Town of Manlius dated November 09, 2022, regarding the preliminary subdivision of above-referenced property, we offer the following:

- ✦ *Wastewater Services - The Town should have assurances that any future development is sensitive to the location of the existing regional wastewater easements and infrastructure on site. Continued coordinated planning with the Onondaga County Department of Water Environment Protection (WEP) is required to ensure the Department continues to be involved throughout the process. The Town should ensure that the applicant obtains approval from WEP for capacity assurance and plan review prior to Town approval.*

TDK Response:

- TDK has received an acceptance letter from WEP (see attached).
- ✦ *Potential Floodplain/Floodway Impacts - The site is significantly encumbered by floodplain and floodway areas associated with on- and off-site water courses. The Town should consider the implications of allowing for more intense development in these sensitive environmental areas, particularly within the more restrictive floodway. The Town should consult their local floodplain ordinance, which contains FEMA requirements including submission of a hydrology study and identification of any*

necessary mitigation to protect the floodway and floodplain, before any development in the floodway. The applicant advised to consider that new structures and parking within a floodplain/floodway may result in significant expense or property flood insurance coverage.

TDK Response:

- A floodplain analysis has been conducted relative to proposed development of approximately 9 acres (7%) of the 130-acre property. Provisions for flood plain mitigation (offset) of impacts have been incorporated into the earthwork and related site development plans such that there will be no net increase in the flood elevations resulting from the proposed commercial project.

In general, Twin Shores proposes to interconnect the existing Limestone Creek floodplain corridor with the 23.5-acre southern quarry pond to provide additional surface water storage capacity for storms in excess of the 10-year, 24-hour storm event. It is worth noting that under existing conditions, both the southern and northern quarry ponds that total 38.5 acres in surface area are both physically located outside of the 100-year floodplain associated with Limestone Creek.

A flood plain development permit application with corresponding flood plain modeling support information and construction details will be provided to the Town for project coordination and approval.

- ✦ *Potential Wetland Impacts - The Town should ensure that the current wetland study and delineations are confirmed by the DEC and ACE and the applicant obtain any necessary permits prior to approving any proposed development. Optimally, a DEC-approved mitigation plan will be developed for any wetland disturbance and/or crossings.*

TDK Response:

- In 2018 a Jurisdictional Determination (JD) was issued by the Army Corps of Engineers (ACE) which indicated that no permits were required for work within the two large quarry ponds or four (4) smaller isolated wetlands within the 130-acre property.
- An additional wetland study was completed by Shumaker Consulting Engineering (Shumaker) on June 8, 2022. The report, along with a request for Approved Jurisdictional Determination (AJD) was submitted to the Army Corps of Engineers (ACE) on July 27, 2022. The New York State Department of Environmental Conservation (DEC) was copied on the request.

- A follow-up site visit was conducted by representatives of Shumaker and ACE on September 20, 2022. On November 5, 2022, the ACE issued a AJD which removed three additional small wetlands from their permitting requirements and a Preliminary Jurisdictional Determination (PJD) which identified three streams (Limestone Creek and two tributaries) within the 130-acre property that may be subject to regulatory jurisdiction.
 - It is understood that applications for permits for work within any regulated aquatic resources will be made to the ACE. No State-designated wetlands exist within the limits of the proposed commercial development.
- ✦ *Potential Stormwater Impacts - The Town should ensure that phase one development approval is contingent on conceptual approval of stormwater impact mitigation and management for full build-out of the overall development. This is necessary given on- and off-site water courses, the proximity and encroachment into floodplain and floodway areas, and potential state and federal wetlands. A Stormwater Pollution Prevention Plan (SWPPP) will be required by the Onondaga County Department of Transportation as part of the Department's review for any future development of the site.*

TDK Response:

- A draft Stormwater Pollution Prevention Plan (SWPPP) has been prepared consistent with the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activities (DEC General Permit #GP-0-20-001). The SWPPP only addresses the proposed commercial development, as the balance of the Twin Shore tract that is zoned R-5, will have separate and stand-alone stormwater management system. A copy has been submitted to the Town as part of the site plan approval package.
- Again, regarding floodplain and floodway aspects, existing and proposed conditions have been evaluated and potential impacts addressed in a practical manner to not only serve the commercial project, but to also improve flood water management along the Limestone Creek corridor for the adjacent community.
- This project proposes to incorporate the surface water storage capacity of the 23.5-acre southern quarry pond as an overflow component for storms exceeding the 10-year, 24-hour design storm event, as this quarry pond does not currently lie within the existing 100-year floodplain associated with Limestone Creek.

- Refer to above response to *Potential Wetland Impacts* for additional information regarding federal and state wetland considerations.
- *Potential Traffic Impacts - The applicant should provide additional detail and coordinated planning to review potential traffic impacts of the project. The applicant is advised to coordinate with the Onondaga County Department of Transportation (OCDOT) early in the planning process. Traffic data and a lighting plan for full build-out will be required as part of the Department's review of any future development of the site. The Department advises that the right-in/rightout drives on North Burdick Street shown on the plan will not be permitted.*

TDK Response:

- As requested, an updated traffic study has been prepared to address potential full development of the 130-acre property, but it should be understood that Twin Shores is only proposing to develop the commercially zoned property. The proposed project will include the installation of a previously approved traffic signal as a primary entrance and also proposes to include a secondary driveway to the north that will allow for right in-right out traffic patterns, only. Furthermore, it is our understanding that a coordinated review of this project is currently underway with OCDOT, and we respectfully reserve the right to work through the alternate ingress-egress access point with them, accordingly.
- *Coordination with State Parks - Since the proposed project site is located within 500' of the Old Erie Canal State Park and Green Lakes State Park, the Town should continue coordinating with the Office of Parks, Recreation, and Historic Preservation to ensure any future projects in the proposed zoning areas will not negatively impact nearby parklands.*

TDK Response:

- Recommendation is noted and Twin Shores concurs with the overall objective. Project representatives have been in communication with representatives of the Parks since the initiation of the project.
- *Mobility - Per the recommendations from the Onondaga County Empire State Trail Local Economic Opportunities Plan, the applicant should consider working with OCDOT and CENTRO to include sidewalks and bus stop facilities along the North Burdick Street frontage, including pedestrian push buttons and crosswalks at intersections and bicycle racks where appropriate.*

TDK Response:

- Duly noted and it is our understanding that proposed Burdick Street right-of-way improvements are in progress with all involved parties. Additionally, please note that pedestrian crosswalks with signals and pushbuttons are proposed crossing the proposed site driveway with the extension of sidewalk along the frontage of the commercial property. A pedestrian crossing of North Burdick Street on the north side of the proposed signal, with pedestrian signals and pushbuttons, is also proposed. Full details of the design of these amenities will be finalized with OCDOT through the design/permitting process.
- ✦ *Open Space - The Town and applicant should explore options to dedicate environmentally encumbered lands (ponds, floodway, wetlands) and open space to the Town or a land trust to ensure that the sensitive environmental areas are maintained as open space and protected from future development.*

TDK Response:

- Noted.

We offer the above information for clarification purposes and understand that the Town will be referring this project to you for consideration. However, if you or any of the other Board members have any questions or require additional information regarding this project, please do not hesitate to contact us.

Sincerely,

TDK ENGINEERING ASSOCIATES, P.C.

 FOR JOE
Joseph E. Durand, P.E.

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