

November 5, 2019

Geoffrey French
Chairman
Town of Ghent Planning Board
Ghent Town Hall
Ghent, NY 12075

**RE: Art Omi, Inc.
Visitor Center Expansion
CPL # 15326.0001**

Dear Chairman French and Planning Board Members:

This office is in receipt of a set of revised site plan documents consisting of seven (7) drawings, dated last revised October 30 and November 1, 2019, and responses to this offices comments regarding the Stormwater Pollution Prevention Plan (SWPPP), prepared by Patrick Prendergast, P.E. regarding the above referenced project. In addition, this office has an updated project narrative.

This office has reviewed the Updated Site Plans and related data for the proposed expansion of the existing Benenson Visitors Center, located on Columbia County Route 22. Based upon our review of the documents provided, we offer the following comments for your consideration regarding Site Plan approval:

Site Plan

1. It continues to be the opinion of this office that the applicant's engineer has not adequately addressed this office's previous comment regarding traffic. As previously stated, this office recommends that the applicant's engineer provide an engineering report that provides a projection on the increase in traffic. Although the applicant has obtained correspondence, in the form of an email the Columbia County Highway Department indicating that the access is adequate and the County does not see the need for a traffic analysis for their access, this does not address this office's concern regarding the potential impact associated with the proposed action before the Planning Board.

For the purposes of conducting its SEQRA review, the planning board is tasked with "taking a hard look" at the potential impacts associated with the proposed action. This includes the potential increase in the intensity of and existing use. The applicant has prepared a detailed project narrative that includes the existing and proposed number of attendees for various events that occur on the grounds of the facilities under the control of Art Omi. Mr. Prendergast states within his correspondence dated October 2, 2019, "Event traffic will be the same as it is today. The events are the peak traffic generators and they are adequately handled today." The information contained with the project narrative provides background data for use in a traffic study that would allow for the applicant's engineer to calculate the current and anticipated number of traffic trips associate with the various uses and



events. However, to date, this office has not obtained any data in the form of anticipated trip generation during events that justifies the above statements.

Lack of such data makes it difficult for the Planning Board to fulfill and document its obligation under SEQRA to review the potential impacts of the application and the action being considered by the Planning Board.

Lack of a traffic study may require that the Planning Board impose limits on the number of events, as well as the number of attendees at all events to insure the statement that “event traffic will be the same as it is today” holds true in the continued operation of the grounds and the future expansion of the facility. It is the opinion of this office that this scenario will become a significant hardship on the Town of Ghent Code Enforcement officer to insure the applicant is limited to those events and number of attendees listed within the application project narrative.

Based on the above, this office continues to recommend that a traffic study be prepared to identify the existing and anticipated future trip generations at the site as well as a parking implementation plan that identifies the methods utilized to facilitate onsite traffic and parking such as use of parking attendants and shuttles during larger events.

Stormwater Pollution Prevention Plan

SWPPP Review

1. The additional information received from the applicants engineer on October 30, 2019 and November 1, 2019 shall be included within the full SWPPP document and plan set.
2. A pre vs. post development peak runoff rate comparison table for the design point should be provided within the SWPPP that shows the post-development peak runoff rates routed through the stormwater management practice(s). Post development runoff rates for the 1, 10 and 100-year 24-hour storm events must be equal to or less than the pre-development rates.
3. The following comments are regarding the Notice of Intent (NOI) within Appendix A:
 - a. #26 indicates erosion and sediment control practices to be used. Please provide additional details within the plan set for check dams, silt fence and stabilized construction entrance.
 - b. #37 Qp and Qf flow rates are the same. Please review as Qp and Qf represent different storm events.
4. The following comments are regarding the calculations within Appendix C:
 - a. Soil tests should be performed in the location of the stormwater management practices to confirm separation from groundwater.
 - b. Based on the revised Drawing No. 7, it appears there are areas of new impervious and portions of the new building that are not directed to the stormwater management practice. Please review and direct all new impervious areas to a stormwater management practice as required.



Plan Review

5. The locations of the concrete wash area and staging area should be shown and clearly labeled. Provide a detail for the concrete wash area.
6. The following comments are regarding the bioretention filter detail on drawing no. 7:
 - a. A clay berm is shown at the inlet of the bioretention area. Please label the top of berm elevation and clarify if an outlet weir or spillway is necessary to convey the runoff to the bioretention area.
 - b. Confirm on the detail if the area within the clay berm will be vegetated or rip-rap.
 - c. Underdrains are shown in section and plan view. Please provide invert and outlet elevations for the proposed underdrains.

Referrals

1. Columbia County Department of Planning for review and comment in accordance with Municipal Law 239-m.

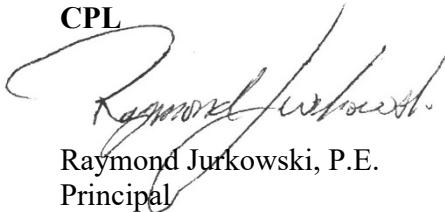
Recommendations

Based on this office's review of the application, it is the opinion of this office that additional information is required for this project prior to the Planning Board moving forward with a SEQRA determination or approval. It is recommended that this office's comments be addressed prior to the Planning Board conducting a public hearing on the project. This correspondence shall be utilized in conjunction with additional comments from the Planning Board, Fire Department, and the Town Attorney.

If you have any questions or concerns, please feel free to contact this office at 518-828-2300.

Very truly yours,

CPL



Raymond Jurkowski, P.E.
Principal

RJJ/sg

CC: Mitchell Khosrova, Esq.
Patrick Prendergast