

Discussion Points Related to FASNY's FEIS Hydrology Portion

- 1) Results of wetland qualification indicators are not included in the FEIS. Response 3.4-3 of the FEIS states that three parameters are necessary to qualify a wetland: hydric soil, hydrology, and vegetation. FASNY indicates that only one of these parameters exists (hydric soils) but the FEIS does not have an analysis proving that the other parameters do not exist. If testing of parameters was completed over a year ago for the DEIS, it may be time for the City to require another test and documented results.
- 2) A revised utility/drainage map needs to be developed to show where all proposed pipes and manholes will be located on the premises. As part of this plan, drainage lines and manholes that are expected to be abandoned should be noted.
- 3) Drainage Design Point #7 does not have adequate documentation. The DEIS states “stormwater either accumulates and infiltrates into the ground or conveyed by an underdrain system to an unknown location” – this has still not been addressed. FASNY indicates in response 3.4-10 that they would include information in the SWPPP, but a revised SWPPP doesn't exist.
- 4) The NYSDEC Guidelines for Design of Dams Section 6.5.3 states: The auxiliary spillway crest must be placed at or above the service spillway design high water, and not less than 1 foot above the service spillway crest. As per FASNY's “Dam Modification Report,” the proposed auxiliary spillway crest is only 0.99 feet above the service spillway crest.
- 5) FASNY's Dam Modification Report refers to several drawings and appendices – these cannot be found in the FEIS.
- 6) A revised SWPPP does not exist for any of the three alternatives mentioned in the FEIS (Ridgeway, North Street, and Bryant Avenue). FASNY states throughout their responses in the FEIS that camera inspections of the existing drain lines as well as documentation for the Drainage Design Point #7 will be included in the SWPPP – this is important information that needs to be addressed.
- 7) In Section 2.2-4-D of the FEIS, FASNY states “The new driveway would require approximately 9,000 square feet of encroachment on a City of White Plains 50-foot “restrictive” wetland. Is it acceptable to place an impervious surface over a restrictive wetland?”
- 8) Land is still not being maintained as a golf course. In section 3.4-4, FASNY admits to this but then lists reasons why this is not necessary. The Army Corps of Engineers correspondence regarding this property clearly states that it must be maintained as a golf course, so it is necessary and FASNY must be held to this standard, no excuses.

9) Response 3.3-1 indicates that FASNY performed six additional test bores during the spring months to determine soil type groundwater depth. Additional test bores should be performed to obtain a more accurate representation of such a large area.

10) By creating parcels of the property, the drainage study becomes less transparent. FASNY should consider the property they purchased to be one parcel and perform an all-inclusive Stormwater runoff study. Additionally, this study should verify the true amount of water that collects on the site as well as neighboring properties to validate that their proposed retention and discharge methods do not negatively impact the surrounding neighborhoods and downstream areas (e.g. Mamaroneck River).

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