



JOINT APPLICATION FORM

For Permits for activities affecting streams, waterways, waterbodies, wetlands, coastal areas, sources of water, and endangered and threatened species.

You must separately apply for and obtain Permits from each involved agency before starting work. Please read all instructions.

1. Applications To:

>NYS Department of Environmental Conservation Check here to confirm you sent this form to NYSDEC.

Check all permits that apply:

| | | | |
|---|---|---|---|
| <input checked="" type="checkbox"/> Stream Disturbance | <input type="checkbox"/> Dams and Impoundment Structures | <input type="checkbox"/> Tidal Wetlands | <input type="checkbox"/> Water Withdrawal |
| <input checked="" type="checkbox"/> Excavation and Fill in Navigable Waters | <input checked="" type="checkbox"/> 401 Water Quality Certification | <input type="checkbox"/> Wild, Scenic and Recreational Rivers | <input type="checkbox"/> Long Island Well |
| <input type="checkbox"/> Docks, Moorings or Platforms | <input type="checkbox"/> Freshwater Wetlands | <input type="checkbox"/> Coastal Erosion Management | <input type="checkbox"/> Incidental Take of Endangered / Threatened Species |

>US Army Corps of Engineers Check here to confirm you sent this form to USACE.

Check all permits that apply: Section 404 Clean Water Act Section 10 Rivers and Harbors Act

Is the project Federally funded? Yes No

If yes, name of Federal Agency: _____

General Permit Type(s), if known: _____

Preconstruction Notification: Yes No

>NYS Office of General Services Check here to confirm you sent this form to NYSOGS.

Check all permits that apply:

State Owned Lands Under Water

Utility Easement (pipelines, conduits, cables, etc.) Docks, Moorings or Platforms

>NYS Department of State Check here to confirm you sent this form to NYSDOS.

Check if this applies: Coastal Consistency Concurrence

2. Name of Applicant Taxpayer ID (if applicant is NOT an individual)

American Water Military Services, LLC 47-3136886

Mailing Address Post Office / City State Zip

1 Water Street Camden NJ 08102

Telephone 856-955-4334 Email stephen.curtis@amwater.com

Applicant Must be (check all that apply): Owner Operator Lessee

3. Name of Property Owner (if different than Applicant)

USAG-WP

Mailing Address Post Office / City State Zip

Bldg. 683 Ruger Road West Point NY 10996

Telephone 845-938-2022 Email evangeline.g.rosel.mil@mail.mil

For Agency Use Only Agency Application Number: _____

4. Name of Contact / Agent
 Paul Madey
 Mailing Address: PO Box 235
 Post Office / City: Highland Falls
 State: NY Zip: 10928
 Telephone: 845-667-1778 Email: paul.madey@amwater.com

5. Project / Facility Name
 Target Hill Wastewater Treatment Plant Outfall
 Property Tax Map Section / Block / Lot Number:
 Project Street Address, if applicable: River Road
 Post Office / City: West Point
 State: NY Zip: 10996
 Provide directions and distances to roads, intersections, bridges and bodies of water:
 See Figure 1
 Town Village City County: Orange Stream/Waterbody Name: Hudson River
 Project Location Coordinates: Enter Latitude and Longitude in degrees, minutes, seconds:
 Latitude: 41 ° 24 ' 04.3 N Longitude: 75 ° 57 ' 54.3 W "

6. Project Description: Provide the following information about your project. Continue each response and provide any additional information on other pages. **Attach plans on separate pages.**

a. Purpose of the proposed project:
 American Water proposes design modifications to the THWWTP Outfall, which was previously permitted under NYSDEC Permit ID Nos. 3-3336-00201/00005 and 3-3336-00201/00004. Exp. 12/31/2023. Proposed design changes will incorporate less intrusive means and methods to install the previously approved THWWTP outfall.

b. Description of current site conditions:
 The existing permit authorizes the installation of two new parallel 14" diameter outfall discharge pipes utilizing horizontal bore technique to extend the discharge point beyond the embankment to the bed of the river, in accordance with the plans and narrative referenced in Natural Resources Permit Condition No. 1 of the permit.

c. Proposed site changes:
 THWWTP outfall piping will be routed through the existing land-based storm water culvert to junction box set in the grouted riprap of the existing culvert. Two 14" diameter HDPE pipes will be extended into the river from the junction box to the same outfall discharge/scour pad location. Pipes will be fabricated on a barge, floated into position and submerged in a controlled manner; anchored utilizing pre-cast concrete collars. Adjacent to the proposed junction box, excavation will be required to maintain effluent piping below the elevation of anticipated ice accumulation.

d. Type of structures and fill materials to be installed, and quantity of materials to be used (e.g., square feet of coverage, cubic yards of fill material, structures below ordinary/mean high water, etc.):
 See Exhibit D.

e. Area of excavation or dredging, volume of material to be removed, location of dredged material placement:
 See Exhibit D.

f. Is tree cutting or clearing proposed? Yes If Yes, explain below. No
 Timing of the proposed cutting or clearing (month/year):
 Number of trees to be cut: Acreage of trees to be cleared:

g. Work methods and type of equipment to be used:

See Exhibit D.

h. Describe the planned sequence of activities:

See Exhibit D.

i. Pollution control methods and other actions proposed to mitigate environmental impacts:

Pipes will be fabricated on a barge, floated into position and submerged in a controlled manner to the final locations. Temporary measures such as porta-dam, sand bags or similar measures will be utilized to install the new junction box and associated piping connections. As indicated in the existing permit, turbidity curtains will be utilized during pipe installation in the river.

j. Erosion and silt control methods that will be used to prevent water quality impacts:

In accordance with the existing permit, prior to the start of construction, all erosion, sediment and turbidity controls shall be installed as shown on plans (Exhibit D). All erosion and sediment controls, as well as any accumulated silt or sediment, shall be entirely removed upon completion of work for disposal at an appropriate upland location.

k. Alternatives considered to avoid regulated areas. If no feasible alternatives exist, explain how the project will minimize impacts:

Activities will adhere to existing permit conditions.

l. Proposed use: Private Public Commercial

m. Proposed Start Date: Estimated Completion Date:

n. Has work begun on project? Yes If Yes, explain below. No

o. Will project occupy Federal, State, or Municipal Land? Yes If Yes, explain below. No

p. List any previous DEC, USACE, OGS or DOS Permit / Application numbers for activities at this location:

Verified authorization under Nationwide Permit No. 7 issued on July 31, 2017 and affirmed (for project modifications) on February 18, 2021. The verification remains active until March 18, 2022.

q. Will this project require additional Federal, State, or Local authorizations, including zoning changes?

Yes If Yes, list below. No

The project has been issued a Federal Consistency Determination in accordance with Coastal Zone Management Act (15 CFR 930).

7. Signatures.

Applicant and Owner (If different) must sign the application. If the applicant is the landowner, the landowner attestation form can be used as an electronic signature as an alternative to the signature below, if necessary. Append additional pages of this Signature section if there are multiple Applicants, Owners or Contact/Agents.

I hereby affirm that information provided on this form and all attachments submitted herewith is true to the best of my knowledge and belief.

Permission to Inspect - I hereby consent to Agency inspection of the project site and adjacent property areas. Agency staff may enter the property without notice between 7:00 am and 7:00 pm, Monday - Friday. Inspection may occur without the owner, applicant or agent present. If the property is posted with "keep out" signs or fenced with an unlocked gate, Agency staff may still enter the property. Agency staff may take measurements, analyze site physical characteristics, take soil and vegetation samples, sketch and photograph the site. I understand that failure to give this consent may result in denial of the permit(s) sought by this application.

False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the NYS Penal Law. Further, the applicant accepts full responsibility for all damage, direct or indirect, of whatever nature, and by whomever suffered, arising out of the project described herein and agrees to indemnify and save harmless the State from suits, actions, damages and costs of every name and description resulting from said project. In addition, Federal Law, 18 U.S.C., Section 1001 provides for a fine of not more than \$10,000 or imprisonment for not more than 5 years, or both where an applicant knowingly and willingly falsifies, conceals, or covers up a material fact; or knowingly makes or uses a false, fictitious or fraudulent statement.

Signature of Applicant

Date



June 10, 2021

Applicant Must be (check all that apply): Owner Operator Lessee

Printed Name

Title

Stephen Curtis

President

Signature of Owner (if different than Applicant)

Date



28 APR 2021

Printed Name

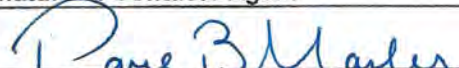
Title

Evangeline G. Rose

COL

Signature of Contact / Agent

Date



6/10/21

Printed Name

Title

Paul B. Madey

EHS Manager

For Agency Use Only

DETERMINATION OF NO PERMIT REQUIRED

Agency Application Number

(Agency Name) has determined that No Permit is required from this Agency for the project described in this application.

Agency Representative:

Printed Name

Title

Signature

Date

EXHIBIT B
SEQRA FEAF & SUPPORTING INFORMATION

Rebecca S. Crist, Deputy Regional Permit Administrator
Division of Environmental Permits
NYSDEC Region 3 Headquarters
21 S. Putt Corners Rd
New Paltz, NY 12561

Re: West Point Target Hill Wastewater Treatment Plant
File: 10881/1940100244

Dear Ms. Crist:

Date: April 21, 2021

American Water Military Services Group, LLC (AWMSG) is planning to upgrade and expand the West Point Target Hill Wastewater Treatment Plant (THWWTP). AWMSG previously submitted a permit application to modify the facility's existing State Pollutant Discharge Elimination System (SPDES) permit.

In regard to the facility's discharge, the NYSDEC (Article 15; 401 Water Quality Certification) and the United States Army Corps of Engineers (USACE; Section 404 of the Clean Water Act; Section 10 of the Rivers and Harbors Act of 1899) previously authorized the relocation/construction of a new Hudson River outfall (NYSDEC Permit ID Nos. 3-3336-00201/00005 and 3-3336-00201/00004). The NYSDEC permits were recently extended (Expiration 12/31/2023) and transferred to AWMSG.

Ref: Target Hill WWTP Upgrade Project

AWMSG continues to propose installation of a new outfall in the Hudson River as part of the Proposed THWWTP Upgrade Project. The location of the outfall discharge point remains the same as previously authorized by the NYSDEC and USACE; however, the proposed means and methods to install the outfall have changed, in part, to further mitigate potential short-term, construction-related impacts within the river. Installation of the outfall pipes from THWWTP will follow a new, less intrusive path to the permit-established outfall discharge point. The net effect should result in a reduced installation timeline, less in-water work, less noise and silt production, and less impact to Hudson River habitats and sensitive species.

The previously approved river work included installation via coffer dam/trenching of dual, parallel 14-inch diameter reinforced concrete pipes, which would extend from a junction box (JB-2) to the proposed outfall discharge point and scour pad. The Proposed Project incorporates less intrusive means and methods to install the outfall. THWWTP outfall piping under the revised Project will be routed through the existing land-based stormwater culvert to the same outfall discharge point approved under current permits. One (1) 24" diameter DIP will be extended

south from the effluent flume into the existing stormwater culvert. Piping located inside the existing culvert will be concrete encased and extend east to a new junction box installed in the existing grouted riprap of the stormwater culvert. New outfall piping exiting the junction box into the river will be two (2) 14" HDPE pipes fabricated on a barge, floated into position and submerged in a controlled manner to the final locations. Outfall piping in the river will be anchored utilizing precast concrete collars. Temporary measures such as porta-dam, cofferdam or similar measures will be utilized to install the new junction box and associated piping connections. As indicated in the existing permit, turbidity curtains will be utilized during pipe installation in the river.

A comparison of previously approved outfall elements and proposed modifications is provided below.

| Outfall Element | Existing Permit | Proposed Modification |
|---|--|--|
| Land Components | | |
| Two 18-inch diameter DIP | Horizontal bore technique | One 24-inch diameter DIP installed in existing stormwater culvert |
| Land/In-River Transition | | |
| Junction Box | New junction box requiring disturbance | Junction box set proximal to existing grouted riprap of existing culvert outfall; adjacent to the proposed junction box, excavation will be required to maintain effluent piping below the elevation of anticipated ice accumulation |
| In-River Components | | |
| Two 14-inch diameter parallel RCP discharge pipes | Installed via trenching | Two 14-inch diameter parallel HDPE pipes floated to position and anchored by precast collars |
| Scour Pad | 10'x20' | No change |

The Garrison has reviewed the revised project pursuant to the National Environmental Policy Act. The Garrison has issued a Record of Environmental Consideration (REC) based on the prior evaluation. In addition, the USACE has stated that the proposed outfall design modifications can proceed under the previously issued Nationwide Permit verification, as long as the previously approved disturbance quantities remain below the approved thresholds, which they do.

We are submitting the enclosed Joint Application for Permit to request that the NYSDEC modify its existing work authorization to account for the proposed outfall design changes. Remaining elements of the permit remain valid.

The following exhibits are enclosed to support this application:

- Exhibit A – Joint Application for Permit

- Exhibit B – SEQRA Full Environmental Assessment Form (FEAF) & Supporting Documentation¹
- Exhibit C – USACE Correspondence
- Exhibit D – Supporting Drawings

We appreciate the Department's consideration of this application, and are available to discuss it further, if necessary.

Yours sincerely,

[]

Enclosures: Exhibit A – Joint Application for Permit
Exhibit B – SEQRA Full Environmental Assessment Form (FEAF) & Supporting Documentation
Exhibit C – USACE Correspondence
Exhibit D – Supporting Drawings

¹ Package **previously submitted** in support of SPDES permit modification.

**Full Environmental Assessment Form
Part 1 - Project and Setting**

Instructions for Completing Part 1

Part 1 is to be completed by the applicant or project sponsor. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification.

Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information; indicate whether missing information does not exist, or is not reasonably available to the sponsor; and, when possible, generally describe work or studies which would be necessary to update or fully develop that information.

Applicants/sponsors must complete all items in Sections A & B. In Sections C, D & E, most items contain an initial question that must be answered either “Yes” or “No”. If the answer to the initial question is “Yes”, complete the sub-questions that follow. If the answer to the initial question is “No”, proceed to the next question. Section F allows the project sponsor to identify and attach any additional information. Section G requires the name and signature of the applicant or project sponsor to verify that the information contained in Part 1 is accurate and complete.

A. Project and Applicant/Sponsor Information.

| | | |
|--|-------------------------|---|
| Name of Action or Project: West Point Target Hill Wastewater Treatment Plan (THWWTP) Upgrades | | |
| Project Location (describe, and attach a general location map): River Road (South of Target Hill Athletic Field) – Building 849, West Point, NY 10996. A site location map is included as Attachment 1. | | |
| Brief Description of Proposed Action (include purpose or need): The United States Army Garrison at West Point (USAG-WP), in conjunction with the THWWTP operator – American Water Military Services, LLC (AW), proposes an upgrade project that includes a combination of rehabilitation of the existing facilities and construction of new facilities (Proposed Project). This Proposed Project supersedes a previous US Army Corps of Engineers (USACE) project to construct an all-new THWWTP to the north of, and contiguous to, the existing plant (Previous Project). Elements of the prior design have been considered and modified for implementation as part of the proposed WWTP Upgrade, which include – a combination of existing, minor-modified, major-modified, and new facilities. Attachment 2 provides a brief project description along with a comparison of impacts associated with the Previous Project (identified in prior SEQRA and NEPA reviews) and the Proposed Project. | | |
| Name of Applicant/Sponsor: American Water Military Services, LLC | Telephone: 856-955-4334 | E-Mail: stephen.curtis@amwater.com |
| Address: 1 Water Street | | |
| City/PO: Camden | State: NJ | Zip Code: 08102 |
| Project Contact (if not same as sponsor; give name and title/role): | Telephone: | E-Mail: |
| Address: | | |
| City/PO: | State: | Zip Code: |
| Property Owner (if not same as sponsor): USAG-WP | Telephone: 845.938.2022 | E-Mail: evangeline.g.rosel.mil@mail.mil |
| Address: Bldg. 683, Ruger Road | | |
| City/PO: US Army Garrison, West Point | State: NY | Zip Code: 10996 |

B. Government Approvals

| B. Government Approvals, Funding, or Sponsorship. ("Funding" includes grants, loans, tax relief, and any other forms of financial assistance.) | | |
|---|---|---|
| Government Entity | If Yes: Identify Agency and Approval(s) Required | Application Date (Actual or projected) |
| a. City Council, Town Board, <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No or Village Board of Trustees | | |
| b. City, Town or Village <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Planning Board or Commission | | |
| c. City, Town or <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Village Zoning Board of Appeals | | |
| d. Other local agencies <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| e. County agencies <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| f. Regional agencies <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| g. State agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | See Attachment 3. | |
| h. Federal agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | See Attachment 3. | |
| i. Coastal Resources. | | |
| i. Is the project site within a Coastal Area, or the waterfront area of a Designated Inland Waterway? | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ii. Is the project site located in a community with an approved Local Waterfront Revitalization Program? | | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| iii. Is the project site within a Coastal Erosion Hazard Area? | | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

C. Planning and Zoning

| C.1. Planning and zoning actions. | |
|---|---|
| Will administrative or legislative adoption, or amendment of a plan, local law, ordinance, rule or regulation be the only approval(s) which must be granted to enable the proposed action to proceed? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <ul style="list-style-type: none"> • If Yes, complete sections C, F and G. • If No, proceed to question C.2 and complete all remaining sections and questions in Part 1 | |
| C.2. Adopted land use plans. | |
| a. Do any municipally- adopted (city, town, village or county) comprehensive land use plan(s) include the site where the proposed action would be located? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| If Yes, does the comprehensive plan include specific recommendations for the site where the proposed action would be located? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| b. Is the site of the proposed action within any local or regional special planning district (for example: Greenway; Brownfield Opportunity Area (BOA); designated State or Federal heritage area; watershed management plan; or other?) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| If Yes, identify the plan(s): <u>Remediation Site 336041 - Military Munitions Response Program (MMRP), Hudson Highlands Scenic Area of Statewide Significance (SASS), Hudson River Valley National Heritage Area</u> _____ _____ | |
| c. Is the proposed action located wholly or partially within an area listed in an adopted municipal open space plan, or an adopted municipal farmland protection plan? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| If Yes, identify the plan(s): _____ _____ _____ | |

C.3. Zoning

a. Is the site of the proposed action located in a municipality with an adopted zoning law or ordinance. Yes No
 If Yes, what is the zoning classification(s) including any applicable overlay district?
Not Applicable - Federal Land

b. Is the use permitted or allowed by a special or conditional use permit? Yes No

c. Is a zoning change requested as part of the proposed action? Yes No
 If Yes,
 i. What is the proposed new zoning for the site? _____

C.4. Existing community services.

a. In what school district is the project site located? Department of Defense Education Activity Mid-Atlantic District - West Point Schools

b. What police or other public protection forces serve the project site?
USAG-WP Directorate of Emergency Services (DES)

c. Which fire protection and emergency medical services serve the project site?
USAG-WP DES

d. What parks serve the project site?
Target Hill Athletic Fields

D. Project Details

D.1. Proposed and Potential Development

a. What is the general nature of the proposed action (e.g., residential, industrial, commercial, recreational; if mixed, include all components)? Community Services (WWTP)

b. a. Total acreage of the site of the proposed action? _____ $\pm 3.2^*$ acres *Footprint of the proposed THWWTP Site
 b. Total acreage to be physically disturbed? _____ $\pm 6^{**}$ acres **Inclusive of construction staging area
 c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? _____ ± 6 acres

c. Is the proposed action an expansion of an existing project or use? Yes No
 i. If Yes, what is the approximate percentage of the proposed expansion and identify the units (e.g., acres, miles, housing units, square feet)? % _____ Units: **Expansion of WWTP average daily flow from 2.06 to 2.30 MGD.

d. Is the proposed action a subdivision, or does it include a subdivision? Yes No
 If Yes,
 i. Purpose or type of subdivision? (e.g., residential, industrial, commercial; if mixed, specify types) _____
 ii. Is a cluster/conservation layout proposed? Yes No
 iii. Number of lots proposed? _____
 iv. Minimum and maximum proposed lot sizes? Minimum _____ Maximum _____

e. Will the proposed action be constructed in multiple phases? Yes No
 i. If No, anticipated period of construction: _____ 29 months
 ii. If Yes:
 • Total number of phases anticipated _____
 • Anticipated commencement date of phase 1 (including demolition) _____ month _____ year
 • Anticipated completion date of final phase _____ month _____ year
 • Generally describe connections or relationships among phases, including any contingencies where progress of one phase may determine timing or duration of future phases: _____

f. Does the project include new residential uses? Yes No
 If Yes, show numbers of units proposed.

| | One Family | Two Family | Three Family | Multiple Family (four or more) |
|-----------------------------|------------|------------|--------------|--------------------------------|
| Initial Phase | _____ | _____ | _____ | _____ |
| At completion of all phases | _____ | _____ | _____ | _____ |

g. Does the proposed action include new non-residential construction (including expansions)? Yes No
 If Yes, **Several new structures associated with wastewater treatment operations are proposed; however, the proposed project also involves modifications to existing structures.

i. Total number of structures 8**

ii. Dimensions (in feet) of largest proposed structure: 18'-0" height; 88'-0" width; and 184'-8" length

iii. Approximate extent of building space to be heated or cooled: approximately 17,000 square feet

h. Does the proposed action include construction or other activities that will result in the impoundment of any liquids, such as creation of a water supply, reservoir, pond, lake, waste lagoon or other storage? Yes No
 If Yes,

i. Purpose of the impoundment: Stormwater bioretention basin, stormwater rain garden, and stormwater infiltration basins.

ii. If a water impoundment, the principal source of the water: Ground water Surface water streams Other specify: Stormwater

iii. If other than water, identify the type of impounded/contained liquids and their source. _____

iv. Approximate size of the proposed impoundment. Volume: 0.08 million gallons; surface area: 0.14 acres

v. Dimensions of the proposed dam or impounding structure: _____ height; _____ length

vi. Construction method/materials for the proposed dam or impounding structure (e.g., earth fill, rock, wood, concrete): Earth, engineered soil, and landscaping.

D.2. Project Operations

a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both? Yes No
 (Not including general site preparation, grading or installation of utilities or foundations where all excavated materials will remain onsite) In addition to general site preparation, minor soil removal in the river will be required to facilitate installation of the new outfall. Work will be performed in accordance with USACE and NYSDEC permits. Refer to the discussion on surface water in Attachment 2 for additional information.

If Yes:

i. What is the purpose of the excavation or dredging? To facilitate outfall installation

ii. How much material (including rock, earth, sediments, etc.) is proposed to be removed from the site?

- Volume (specify tons or cubic yards): Less than allowed under current NYS DEC permits.
- Over what duration of time? Within permitted windows for work in water.

iii. Describe nature and characteristics of materials to be excavated or dredged, and plans to use, manage or dispose of them. Existing river sediments to be disposed off site at appropriate facilities. Refer to Attachment 2 for additional information.

iv. Will there be onsite dewatering or processing of excavated materials? Yes No
 If yes, describe. Separate dewatering permits to be filed with NYS DEC.

v. What is the total area to be dredged or excavated? _____ 0.023 acres

vi. What is the maximum area to be worked at any one time? _____ 0.023 acres

vii. What would be the maximum depth of excavation or dredging? _____ 7 feet

viii. Will the excavation require blasting? Refer to the discussion on Noise and Threatened/Endangered Species Yes No

ix. Summarize site reclamation goals and plan: in Attachment 2 for additional information on blasting activities.
Erosion & sediment controls (E&SC) will be maintained throughout construction. Disturbed areas that are not part of the upgraded WWTP will be re-graded and seeded and E&SC controls will be maintained through restoration.

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment into any existing wetland, waterbody, shoreline, beach or adjacent area? Yes No
 If Yes:

i. Identify the wetland or waterbody which would be affected (by name, water index number, wetland map number or geographic description): Hudson River

ii. Describe how the proposed action would affect that waterbody or wetland, e.g. excavation, fill, placement of structures, or alteration of channels, banks and shorelines. Indicate extent of activities, alterations and additions in square feet or acres:
Work will be performed in accordance with USACE and NYSDEC permits. Refer to the discussion on surface water in Attachment 2 for additional information.

iii. Will the proposed action cause or result in disturbance to bottom sediments? Yes No
 If Yes, describe: Original outfall design revised to further minimize the amount of disturbance to bottom sediments (see Attachment 2).

iv. Will the proposed action cause or result in the destruction or removal of aquatic vegetation? Yes No
 If Yes: The proposed design will reduce the amount of aquatic vegetation removal in comparison to previously permitted outfall design (see Attachment 2).

- acres of aquatic vegetation proposed to be removed: _____
- expected acreage of aquatic vegetation remaining after project completion: _____
- purpose of proposed removal (e.g. beach clearing, invasive species control, boat access): _____
- proposed method of plant removal: _____
- if chemical/herbicide treatment will be used, specify product(s): _____

v. Describe any proposed reclamation/mitigation following disturbance: _____
See Attachment 2.

c. Will the proposed action use, or create a new demand for water? Yes No
 If Yes:

i. Total anticipated water usage/demand per day: _____ New Demand: 300,000 gallons/day

ii. Will the proposed action obtain water from an existing public water supply? Yes No
 If Yes:

- Name of district or service area: existing West Point potable water distribution system
- Does the existing public water supply have capacity to serve the proposal? Yes No
- Is the project site in the existing district? Yes No
- Is expansion of the district needed? Yes No
- Do existing lines serve the project site? Yes No

iii. Will line extension within an existing district be necessary to supply the project? Yes No
 If Yes:

- Describe extensions or capacity expansions proposed to serve this project: _____
New 10" HDPE line will be extended to the project site
- Source(s) of supply for the district: Existing West Point potable water distribution system

iv. Is a new water supply district or service area proposed to be formed to serve the project site? Yes No
 If, Yes:

- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- Proposed source(s) of supply for new district: _____

v. If a public water supply will not be used, describe plans to provide water supply for the project: _____
 vi. If water supply will be from wells (public or private), what is the maximum pumping capacity: _____ gallons/minute.

d. Will the proposed action generate liquid wastes? Yes No
 If Yes: Increased wastewater flows are accounted for in SPDES permit modification application.

i. Total anticipated liquid waste generation per day: _____ 16,000 gallons/day

ii. Nature of liquid wastes to be generated (e.g., sanitary wastewater, industrial; if combination, describe all components and approximate volumes or proportions of each): _____
Sanitary wastewater.

iii. Will the proposed action use any existing public wastewater treatment facilities? Yes No
 If Yes: Not Applicable - Proposed project involves upgrades to existing THWWTP.

- Name of wastewater treatment plant to be used: _____
- Name of district: _____
- Does the existing wastewater treatment plant have capacity to serve the project? Yes No
- Is the project site in the existing district? Yes No
- Is expansion of the district needed? Yes No

- Do existing sewer lines serve the project site? Yes No
- Will a line extension within an existing district be necessary to serve the project? Yes No

If Yes:

- Describe extensions or capacity expansions proposed to serve this project: _____

iv. Will a new wastewater (sewage) treatment district be formed to serve the project site? Not Applicable - Proposed Yes No

If Yes:

project involves upgrades to existing THWWTP.

- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- What is the receiving water for the wastewater discharge? _____

v. If public facilities will not be used, describe plans to provide wastewater treatment for the project, including specifying proposed receiving water (name and classification if surface discharge or describe subsurface disposal plans):
Increased wastewater flows are accounted for in SPDES permit modification application.

vi. Describe any plans or designs to capture, recycle or reuse liquid waste: Not applicable.

e. Will the proposed action disturb more than one acre and create stormwater runoff, either from new point sources (i.e. ditches, pipes, swales, curbs, gutters or other concentrated flows of stormwater) or non-point source (i.e. sheet flow) during construction or post construction? Yes No

If Yes:

i. How much impervious surface will the project create in relation to total size of project parcel?

_____ Square feet or ± 1.7 acres (impervious surface)

_____ Square feet or ± 3.2 acres (parcel size)

ii. Describe types of new point sources. No new point source discharges. Stormwater management practices will mitigate flow to existing discharge points.

iii. Where will the stormwater runoff be directed (i.e. on-site stormwater management facility/structures, adjacent properties, groundwater, on-site surface water or off-site surface waters)?

Stormwater runoff will be directed to a stormwater management system, which will be designed in accordance with state and federal requirements.

- If to surface waters, identify receiving water bodies or wetlands: Hudson River

- Will stormwater runoff flow to adjacent properties? Yes No

iv. Does the proposed plan minimize impervious surfaces, use pervious materials or collect and re-use stormwater? Yes No

f. Does the proposed action include, or will it use on-site, one or more sources of air emissions, including fuel combustion, waste incineration, or other processes or operations? Yes No

If Yes, identify:

i. Mobile sources during project operations (e.g., heavy equipment, fleet or delivery vehicles)

Short-term particulate emissions (dust) and equipment exhaust emissions during construction activities which will be mitigated by proper maintenance of vehicles and equipment, as well as dust suppression procedures (as necessary).

ii. Stationary sources during construction (e.g., power generation, structural heating, batch plant, crushers)

None stationary sources during construction are anticipated.

iii. Stationary sources during operations (e.g., process emissions, large boilers, electric generation)

Four natural gas/biogas digester boilers, four emergency diesel generators and a flare for excess biogas.

g. Will any air emission sources named in D.2.f (above), require a NY State Air Registration, Air Facility Permit, Yes No or Federal Clean Air Act Title IV or Title V Permit? New York State Air Registration

If Yes:

i. Is the project site located in an Air quality non-attainment area? (Area routinely or periodically fails to meet ambient air quality standards for all or some parts of the year) Yes No

ii. In addition to emissions as calculated in the application, the project will generate:

- ~1,450 Tons/year (short tons) of Carbon Dioxide (CO₂)
- <1 Tons/year (short tons) of Nitrous Oxide (N₂O)
- 0 Tons/year (short tons) of Perfluorocarbons (PFCs)
- 0 Tons/year (short tons) of Sulfur Hexafluoride (SF₆)
- 0 Tons/year (short tons) of Carbon Dioxide equivalent of Hydrofluorocarbons (HFCs)
- <1 Tons/year (short tons) of Hazardous Air Pollutants (HAPs)

h. Will the proposed action generate or emit methane (including, but not limited to, sewage treatment plants, landfills, composting facilities)? Yes No

If Yes:

i. Estimate methane generation in tons/year (metric): <1

ii. Describe any methane capture, control or elimination measures included in project design (e.g., combustion to generate heat or electricity, flaring): The biogas generated is going to be used to operate the digester boilers. Excess biogas will be sent to the flare.

i. Will the proposed action result in the release of air pollutants from open-air operations or processes, such as quarry or landfill operations? Yes No

If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust):

Short-term particulate emissions (dust) and equipment exhaust emissions during construction activities. During construction, the contractor will be required to implement mitigation measures to minimize air quality impacts including proper maintenance of vehicles and equipment and implementation (as necessary) of dust suppression measures.

j. Will the proposed action result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services? Yes No

If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust):

Temporary impacts to local traffic within the base and local community during construction. No anticipated impact on traffic after construction is complete.

i. When is the peak traffic expected (Check all that apply): Morning Evening Weekend

Randomly between hours of _____ to _____.

ii. For commercial activities only, projected number of truck trips/day and type (e.g., semi trailers and dump trucks): _____

iii. Parking spaces: Existing _____ Proposed _____ Net increase/decrease _____

iv. Does the proposed action include any shared use parking? Yes No

v. If the proposed action includes any modification of existing roads, creation of new roads or change in existing access, describe: _____

vi. Are public/private transportation service(s) or facilities available within 1/2 mile of the proposed site? Yes No

vii. Will the proposed action include access to public transportation or accommodations for use of hybrid, electric or other alternative fueled vehicles? Yes No

viii. Will the proposed action include plans for pedestrian or bicycle accommodations for connections to existing pedestrian or bicycle routes? Yes No

k. Will the proposed action (for commercial or industrial projects only) generate new or additional demand for energy? Yes No

If Yes:

i. Estimate annual electricity demand during operation of the proposed action: _____

8,549,760 kWh (976 kW average demand)

ii. Anticipated sources/suppliers of electricity for the project (e.g., on-site combustion, on-site renewable, via grid/local utility, or other):

Grid/local utility with diesel-engine-driven standby generator

iii. Will the proposed action require a new, or an upgrade, to an existing substation? Yes No

l. Hours of operation. Answer all items which apply.

| | | | |
|-------------------------|---------------------|------------------------|---------------------|
| i. During Construction: | | ii. During Operations: | |
| • Monday - Friday: | <u>6am - 4pm</u> | • Monday - Friday: | <u>6am - 4pm</u> |
| • Saturday: | <u>7:30am - 4pm</u> | • Saturday: | <u>7:30am - 4pm</u> |
| • Sunday: | <u>7:30am - 4pm</u> | • Sunday: | <u>7:30am - 4pm</u> |
| • Holidays: | <u>7:30am - 4pm</u> | • Holidays: | <u>7:30am - 4pm</u> |

m. Will the proposed action produce noise that will exceed existing ambient noise levels during construction, operation, or both? Yes No

If yes:

i. Provide details including sources, time of day and duration:
No significant operational phase noise impacts are anticipated. Refer to the discussion on construction-related noise impacts included in Attachment 2.

ii. Will the proposed action remove existing natural barriers that could act as a noise barrier or screen? Yes No
 Describe: _____

n. Will the proposed action have outdoor lighting? Yes No

If yes:

i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures:
Minimal use of exterior and site lighting is anticipated. Fully shielded fixtures will be utilized to prevent glare and night-sky related light pollution. Lighting will conform to various US Army design guideline including the Garrison Commander's Guidelines for Outdoor Lighting at West Point.

ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen? Yes No
 Describe: _____

o. Does the proposed action have the potential to produce odors for more than one hour per day? Yes No

If Yes, describe possible sources, potential frequency and duration of odor emissions, and proximity to nearest occupied structures: _____

The Proposed Project will not result in any new types of impact or an increase in the magnitude of impact over current operations. Food related waste is planned to be accepted at the Solids Dump Station.

p. Will the proposed action include any bulk storage of petroleum (combined capacity of over 1,100 gallons) or chemical products 185 gallons in above ground storage or any amount in underground storage? Yes No

If Yes:

i. Product(s) to be stored An existing diesel aboveground storage tank will remain on-site.

ii. Volume(s) 2,400 gal per unit time year-round (e.g., month, year)

iii. Generally, describe the proposed storage facilities: _____

q. Will the proposed action (commercial, industrial and recreational projects only) use pesticides (i.e., herbicides, insecticides) during construction or operation? Yes No

If Yes: Not Applicable - Commercial, Industrial or Recreational projects only.

i. Describe proposed treatment(s): _____

ii. Will the proposed action use Integrated Pest Management Practices? Yes No

r. Will the proposed action (commercial or industrial projects only) involve or require the management or disposal of solid waste (excluding hazardous materials)? Yes No

If Yes: Not Applicable - Commerical or Industrial projects only.

i. Describe any solid waste(s) to be generated during construction or operation of the facility:

- Construction: _____ tons per _____ (unit of time)
- Operation : _____ tons per _____ (unit of time)

ii. Describe any proposals for on-site minimization, recycling or reuse of materials to avoid disposal as solid waste:

- Construction: _____
- Operation: _____

iii. Proposed disposal methods/facilities for solid waste generated on-site:

- Construction: _____
- Operation: _____

s. Does the proposed action include construction or modification of a solid waste management facility? Yes No

If Yes:

i. Type of management or handling of waste proposed for the site (e.g., recycling or transfer station, composting, landfill, or other disposal activities): _____

ii. Anticipated rate of disposal/processing:

- _____ Tons/month, if transfer or other non-combustion/thermal treatment, or
- _____ Tons/hour, if combustion or thermal treatment

iii. If landfill, anticipated site life: _____ years

t. Will the proposed action at the site involve the commercial generation, treatment, storage, or disposal of hazardous waste? Yes No

If Yes: Refer to the discussion on Hazardous Materials and Wastes included in Attachment 2 for additional information.

i. Name(s) of all hazardous wastes or constituents to be generated, handled or managed at facility: _____

ii. Generally describe processes or activities involving hazardous wastes or constituents: _____

iii. Specify amount to be handled or generated _____ tons/month

iv. Describe any proposals for on-site minimization, recycling or reuse of hazardous constituents: _____

v. Will any hazardous wastes be disposed at an existing offsite hazardous waste facility? Yes No

If Yes: provide name and location of facility: _____

If No: describe proposed management of any hazardous wastes which will not be sent to a hazardous waste facility: _____

E. Site and Setting of Proposed Action

E.1. Land uses on and surrounding the project site

a. Existing land uses.

i. Check all uses that occur on, adjoining and near the project site.

- Urban Industrial Commercial Residential (suburban) Rural (non-farm)
- Forest Agriculture Aquatic Other (specify): US Army Garrison

ii. If mix of uses, generally describe:

b. Land uses and covertypes on the project site.

| Land use or Covertypes | Current Acreage | Acreage After Project Completion | Change (Acres +/-) |
|---|-----------------|----------------------------------|--------------------|
| • Roads, buildings, and other paved or impervious surfaces | ±1.2 | ±1.7 | +0.5 |
| • Forested | ±0.1 | 0 | -0.1 |
| • Meadows, grasslands or brushlands (non-agricultural, including abandoned agricultural) | ±1.1 | ±1.3 | +0.2 |
| • Agricultural (includes active orchards, field, greenhouse etc.) | 0 | 0 | 0 |
| • Surface water features (lakes, ponds, streams, rivers, etc.) | 0 | ±0.15 | +0.15 |
| • Wetlands (freshwater or tidal) | 0 | 0 | 0 |
| • Non-vegetated (bare rock, earth or fill) | 0 | ±0.05 | 0 |
| • Other Describe: <u>Athletic Fields (Refer to discussion on athletic fields in Attachment 2).</u> | ±0.8 | 0 | -0.8 |

c. Is the project site presently used by members of the community for public recreation? Yes No
 i. If Yes: explain: Target Hill Athletic Fields (used by the academy).

d. Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? Yes No
 If Yes,
 i. Identify Facilities:

e. Does the project site contain an existing dam? Yes No
 If Yes:
 i. Dimensions of the dam and impoundment:
 • Dam height: _____ feet
 • Dam length: _____ feet
 • Surface area: _____ acres
 • Volume impounded: _____ gallons OR acre-feet
 ii. Dam's existing hazard classification: _____
 iii. Provide date and summarize results of last inspection:

f. Has the project site ever been used as a municipal, commercial or industrial solid waste management facility, or does the project site adjoin property which is now, or was at one time, used as a solid waste management facility? Yes No
 If Yes: There are several closed solid waste management facilities on the USAG-WP campus;
 i. Has the facility been formally closed? however, they are not located on the proposed project site. Yes No
 • If yes, cite sources/documentation: _____
 ii. Describe the location of the project site relative to the boundaries of the solid waste management facility:

 iii. Describe any development constraints due to the prior solid waste activities: _____

g. Have hazardous wastes been generated, treated and/or disposed of at the site, or does the project site adjoin property which is now or was at one time used to commercially treat, store and/or dispose of hazardous waste? Yes No
 If Yes:
 i. Describe waste(s) handled and waste management activities, including approximate time when activities occurred:
USAG-WP is classified as a large quantity generator (LQG) of hazardous waste. Various hazardous materials are currently used and/or present on the USAG-WP campus as a whole. Refer to the discussion on Hazardous Materials and Wastes included in Attachment 2 for additional information.

h. Potential contamination history. Has there been a reported spill at the proposed project site, or have any remedial actions been conducted at or adjacent to the proposed site? Yes No
 If Yes:
 i. Is any portion of the site listed on the NYSDEC Spills Incidents database or Environmental Site Remediation database? Check all that apply: Yes No
 Yes – Spills Incidents database Provide DEC ID number(s): Various - Closed
 Yes – Environmental Site Remediation database Provide DEC ID number(s): 336041
 Neither database
Source: https://ofmpub.epa.gov/apex/cimc/f?p=182:RCRA:26431408596087:::P14_RCRA_HANDLER_ID:NY8210020915#cleanup
 ii. If site has been subject of RCRA corrective activities, describe control measures: _____
Based on review of information on the USEPA website, no controls are currently in place. However, it should be noted that the site caps associated with the closed landfills are inspected and groundwater is monitored routinely. Additionally, USAG-WP has developed a Military Munitions Response Program to address Unexploded Ordnance (UXO).
 iii. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? Yes No
 If yes, provide DEC ID number(s): RCRA Site 336041 and State Superfund Site 546031.
 iv. If yes to (i), (ii) or (iii) above, describe current status of site(s):
Site 336041 remains active and is summarized above in item h.ii. Site 546031 is associated with the Hudson River PCB Sediments Superfund Site which also remains active.

v. Is the project site subject to an institutional control limiting property uses? Yes No

- If yes, DEC site ID number: _____
- Describe the type of institutional control (e.g., deed restriction or easement): _____
- Describe any use limitations: _____
- Describe any engineering controls: _____
- Will the project affect the institutional or engineering controls in place? Yes No
- Explain: _____

E.2. Natural Resources On or Near Project Site

a. What is the average depth to bedrock on the project site? Campus Average - 30 feet

b. Are there bedrock outcroppings on the project site? Yes No
If Yes, what proportion of the site is comprised of bedrock outcroppings? _____ %

c. Predominant soil type(s) present on project site: Chenango gravelly silt loam (CnA) 100 %
_____ %
_____ %

d. What is the average depth to the water table on the project site? Average: 13 feet

e. Drainage status of project site soils: Well Drained: 100 % of site
 Moderately Well Drained: _____ % of site
 Poorly Drained: _____ % of site

f. Approximate proportion of proposed action site with slopes: 0-10%: 100 % of site
 10-15%: _____ % of site
 15% or greater: _____ % of site

g. Are there any unique geologic features on the project site? Yes No
If Yes, describe: _____

h. Surface water features.

i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)? Refer to the discussion on surface water in Attachment 2 for additional information. Yes No

ii. Do any wetlands or other waterbodies adjoin the project site? Yes No
If Yes to either *i* or *ii*, continue. If No, skip to E.2.i.

iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency? Yes No

iv. For each identified regulated wetland and waterbody on the project site, provide the following information:

- Streams: Name Hudson River Classification B
- Lakes or Ponds: Name _____ Classification _____
- Wetlands: Name _____ Approximate Size _____
- Wetland No. (if regulated by DEC) _____

v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies? Yes No
If yes, name of impaired water body/bodies and basis for listing as impaired: _____

i. Is the project site in a designated Floodway? Yes No

j. Is the project site in the 100-year Floodplain? Yes No

k. Is the project site in the 500-year Floodplain? Refer to the discussion on Flood Protection in Attachment 2 for additional information. Yes No

l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer? Yes No
If Yes:
i. Name of aquifer: _____

m. Identify the predominant wildlife species that occupy or use the project site: _____
 squirrels, rabbits, mice and common birds _____

n. Does the project site contain a designated significant natural community? Yes No
 If Yes:
 i. Describe the habitat/community (composition, function, and basis for designation): _____
 Chestnut Oak Forest, Acidic Talus Slope Woodland, Cligg Community, Pitch Pine-Oak-Heath Rocky Summit (outside of area of potential effect).
 ii. Source(s) of description or evaluation: _____
 iii. Extent of community/habitat:
 • Currently: _____ 9906.06, 358.0, 5.0, 25.0 acres
 • Following completion of project as proposed: _____ 9906.06, 358.0, 5.0, 25.0 acres
 • Gain or loss (indicate + or -): _____ 0 acres

o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species? Yes No
 If Yes:
 i. Species and listing (endangered or threatened): _____
 Northern Long-eared Bat, Timber Rattlesnake, Bald Eagle, Atlantic Sturgeon, Shortnose Sturgeon. Mitigation measures identified in the previously issued USACE and NYSDEC permits for construction activities, including in-water work, will be followed. See Attachment 2 for a description of these and additional mitigation measures.

p. Does the project site contain any species of plant or animal that is listed by NYS as rare, or as a species of special concern? Yes No
 If Yes:
 i. Species and listing: _____
 Eastern Small-footed Myotis (Species of Special Concern)

q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing? Yes No
 If yes, give a brief description of how the proposed action may affect that use: _____
 Temporary impacts during installation of the outfall.

E.3. Designated Public Resources On or Near Project Site

a. Is the project site, or any portion of it, located in a designated agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? Yes No
 If Yes, provide county plus district name/number: _____

b. Are agricultural lands consisting of highly productive soils present? Yes No
 i. If Yes: acreage(s) on project site? _____
 ii. Source(s) of soil rating(s): _____

c. Does the project site contain all or part of, or is it substantially contiguous to, a registered National Natural Landmark? Yes No
 If Yes:
 i. Nature of the natural landmark: Biological Community Geological Feature
 ii. Provide brief description of landmark, including values behind designation and approximate size/extent: _____

d. Is the project site located in or does it adjoin a state listed Critical Environmental Area? Yes No
 If Yes:
 i. CEA name: _____
 ii. Basis for designation: _____
 iii. Designating agency and date: _____

Disclaimer: The EAF Mapper is a screening tool intended to assist project sponsors and reviewing agencies in preparing an environmental assessment form (EAF). Not all questions asked in the EAF are answered by the EAF Mapper. Additional information on any EAF question can be obtained by consulting the EAF Workbooks. Although the EAF Mapper provides the most up-to-date digital data available to DEC, you may also need to contact local or other data sources in order to obtain data not provided by the Mapper. Digital data is not a substitute for agency determinations.

| | |
|--|---|
| B.i.i [Coastal or Waterfront Area] | Yes |
| B.i.ii [Local Waterfront Revitalization Area] | No |
| C.2.b. [Special Planning District] | Yes - Digital mapping data are not available for all Special Planning Districts. Refer to EAF Workbook. |
| C.2.b. [Special Planning District - Name] | Remediation Sites:336041 |
| E.1.h [DEC Spills or Remediation Site - Potential Contamination History] | Yes - Digital mapping data for Spills Incidents are not available for this location. Refer to EAF Workbook. |
| E.1.h.i [DEC Spills or Remediation Site - Listed] | Yes |
| E.1.h.i [DEC Spills or Remediation Site - Environmental Site Remediation Database] | Yes |
| E.1.h.i [DEC Spills or Remediation Site - DEC ID Number] | 336041 |
| E.1.h.iii [Within 2,000' of DEC Remediation Site] | Yes |
| E.1.h.iii [Within 2,000' of DEC Remediation Site - DEC ID] | 336041, 546031 |
| E.2.g [Unique Geologic Features] | No |
| E.2.h.i [Surface Water Features] | Yes |
| E.2.h.ii [Surface Water Features] | Yes |
| E.2.h.iii [Surface Water Features] | Yes - Digital mapping information on local and federal wetlands and waterbodies is known to be incomplete. Refer to EAF Workbook. |
| E.2.h.iv [Surface Water Features - Wetlands Name] | Federal Waters |
| E.2.h.v [Impaired Water Bodies] | No |
| E.2.i. [Floodway] | No |
| E.2.j. [100 Year Floodplain] | Yes |

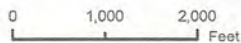
| | |
|---|---|
| E.2.k. [500 Year Floodplain] | Yes |
| E.2.l. [Aquifers] | No |
| E.2.n. [Natural Communities] | Yes |
| E.2.n.i [Natural Communities - Name] | Chestnut Oak Forest, Acidic Talus Slope Woodland, Cliff Community, Pitch Pine-Oak-Heath Rocky Summit |
| E.2.n.i [Natural Communities - Acres] | 9906.06, 358.0, 5.0, 25.0 |
| E.2.o. [Endangered or Threatened Species] | Yes |
| E.2.o. [Endangered or Threatened Species - Name] | Northern Long-eared Bat, Timber Rattlesnake, Bald Eagle, Atlantic Sturgeon, Shortnose Sturgeon |
| E.2.p. [Rare Plants or Animals] | Yes |
| E.2.p. [Rare Plants or Animals - Name] | Eastern Small-footed Myotis |
| E.3.a. [Agricultural District] | No |
| E.3.c. [National Natural Landmark] | No |
| E.3.d [Critical Environmental Area] | No |
| E.3.e. [National or State Register of Historic Places or State Eligible Sites] | Yes - Digital mapping data for archaeological site boundaries are not available. Refer to EAF Workbook. |
| E.3.e.ii [National or State Register of Historic Places or State Eligible Sites - Name] | U.S. Military Academy |
| E.3.f. [Archeological Sites] | Yes |
| E.3.i. [Designated River Corridor] | No |

ATTACHMENT 1
SITE LOCATION MAP



KEY MAP

Map Scale: 1:1,24,000;
Map Center: 73°57'55"W 41°24'10"N



SITE LOCATION

FIGURE 1

AMERICAN WATER MILITARY SERVICES
WEST POINT TARGET HILL WWTP
WEST POINT, NEW YORK

RAMBOLL US CORPORATION
A RAMBOLL COMPANY



ATTACHMENT 2
IMPACT COMPARISON TABLE

TARGET HILL WWTP UPGRADE PROJECT – SEQRA/NEPA IMPACT COMPARISON (PREVIOUS VS. PROPOSED PROJECT)

The existing Target Hill Wastewater Treatment Plant (THWWTP) was constructed in 1956 as a primary treatment facility with major processes consisting of an influent bar rack, grit removal system, comminution, influent pumping, primary clarification, chlorination, digestion, and sludge drying beds.

A major upgrade was constructed in 1972 with the expansion of the original processes for increased flow capacity. Additional processes added at that time were secondary treatment (aeration tanks, secondary clarifiers, blowers), sludge flotation thickening, and vacuum filter dewatering facilities. Miscellaneous upgrades since the 1972 expansion included replacement of chlorine gas with sodium hypochlorite for disinfection; replacement of the flotation thickener with a gravity belt thickener; replacement of the vacuum filter with a belt filter press; replacement of the centrifugal blowers with turbo blowers; and rehabilitation of the digesters – as well as the addition of standby generator with enclosure, portable storage containers, and laboratory trailer. The digester rehabilitation completed several years ago, included addition of new covers, rehabilitation of exterior walls and roof, new mixing systems (primary digesters), and new gas system. A majority of the existing structural / architectural and mechanical / electrical systems are currently at or beyond their expected design life.

To provide adequate wastewater treatment for the foreseeable future, the United States Army Garrison (USAG) at West Point, in conjunction with the plant operator – American Water Military Services, LLC (AW), proposes an upgrade project that includes a combination of rehabilitation of the existing facilities and construction of new facilities (Proposed Project).

This Proposed Project supersedes a previous US Army Corps of Engineers (USACE) project to construct an all-new THWWTP located immediately to the north of the existing plant (Previous Project). The previous all-new WWTP design is no longer under consideration as the recommended path forward due to cost considerations. Elements of the prior design have been considered and modified for implementation as part of the proposed WWTP Upgrade, which include a combination of existing, minor-modified, major-modified, and new facilities. In addition, the Proposed Project incorporates less intrusive means and methods to install the previously approved THWWTP outfall. THWWTP effluent piping under the Proposed Project will be routed through the existing stormwater culvert to the same effluent discharge point approved under current permits. One (1) 24" diameter DIP will be extended south from the effluent flume into the existing stormwater culvert. Piping located inside the existing culvert will be concrete encased and extend east to a new junction box installed in the existing grouted riprap of the culvert. New effluent piping exiting the junction box into the river will be two (2) 14" HDPE pipes fabricated on a barge, floated into position and submerged in a controlled manner to the final locations. Adjacent to the junction box, excavation will be required to maintain effluent piping below the elevation of anticipated ice accumulation. Effluent piping in the river to be anchored utilizing precast concrete collars. Temporary measures such as sand bags, porta-dam, cofferdam or similar will be utilized to install the new junction box and associated piping connections. Turbidity curtains



will be utilized during piping installation in the Hudson River. Again, the effluent discharge point approved under current permits will be maintained.

The Previous Project underwent requisite environmental impact assessments pursuant to the State Environmental Quality Review Act (SEQRA) and National Environmental Policy Act (NEPA). In regard to SEQRA, the New York State Department of Environmental Conservation (NYSDEC) issued a Notice of Determination of Non-Significance (Negative Declaration) on August 24, 2017, indicating that the project – construction and operation of a new THWWTP – would not result in a significant adverse impact on the environment and that preparation of an Environmental Impact Statement (EIS) would not be necessary. In regard to NEPA, the USAG at West Point prepared an Environmental Assessment (EA), which supported the issuance, on October 6, 2017, of a Finding of No Significant Impact (FNSI). Based on the evaluation of environmental impacts, the FNSI indicated that the proposed action, consisting of the construction and operation of a new THWWTP, was not a major federal action significantly affecting the quality of the human environment. The USAG at West Point concluded that implementation of the mitigation measures discussed in the EA and incorporated into the FNSI would reduce the potential impacts of the proposed action, resulting in no significant adverse impacts to the environment. A NEPA EIS, therefore, was also not required. Requisite permits for the in-river work were subsequently issued by both the NYSDEC and USACE.

The table below compares the potential impacts on the environment of the Previous Project (new THWWTP), which were evaluated in the prior SEQRA and NEPA reviews, with potential impacts from the currently Proposed Project (rehabilitation of existing THWWTP). Information regarding impacts and mitigation were gleaned from the NYSDEC’s prior SEQRA Negative Declaration (August 2017) and the USAG at West Point’s NEPA FNSI (October 2017). The objectives of the table are to evaluate information relative to the prior assessment of impacts and mitigation and its potential relevancy and validity in regard to the Proposed Project. It is understood that this assessment will facilitate informed decision-making by the NYSDEC and USAG at West Point relative to forthcoming SEQRA and NEPA determinations for the Proposed Project.

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
|-------------------------------|--|---|
| Impact on Land/Geology | <p>SOURCE: SEQRA NEGATIVE DECLARATION</p> <p>The parcel on which the Target Hill WWTP will be reconstructed is approximately 9.78 acres in area (currently used as athletic fields); the surrounding grounds of the US Military Academy upon which the Target Hill WWTP is situated totals approximately 16,000 acres. In order to construct a replacement WWTP adjacent to the existing WWTP, the entire 9.78-acre parcel will be disturbed. Remaining existing fields to the north of the</p> | <p>REDUCED IMPACT. The existing THWWTP is situated on approximately 2.15-acres of the 16,000-acre US Military Academy site; contiguous to the site of Previous Project. The Previous Project was estimated to disturb approximately 9-acres for the new WWTP. It is anticipated that the Proposed Project will disturb approximately 6-acres (including staging/laydown and site</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
|----------|--|---|
| | <p>existing WWTP will be reconfigured to maximize their continued use. Upon completion of the new plant, the existing Target Hill WWTP will be demolished, and the area which had contained the former WWTP, and parking area to the south, will be converted for recreational use to offset any reduction in number of current athletic fields or open space.</p> <p>A portion of those lands north of the existing WWTP is located within the Target Hill Munitions Response Site (MRS), and the site of the existing WWTP is included within the Siege Battery MRS. An investigation performed of the site found that no items of unexploded ordinance (UXO) and no munitions or explosives of concern (MEC) were found. An additional subsurface investigation was performed in October 2016 which identified impacted soil and groundwater (metals, toluene, and total petroleum hydrocarbons). It is believed that such contamination is localized and most likely resultant from an historical spill. This area is not anticipated to be disturbed during construction; no soils will be removed from the site; impacted soils will remain in place. If any impacted soil or groundwater is encountered during construction, the applicant has indicated that such impacted soil and/or groundwater will be managed in accordance with applicable federal, NY State, local and Department of Defense Army Rule 200-1 requirements.</p> <p>The sponsor, US Department of the Army, has developed site plans and a Stormwater Pollution Prevention Plan (SWPPP) for the project which include proposed sediment and erosion controls for the construction phase of the project. Based on the above, and upon proposed</p> | <p>regrading to facility flood protection) to support new or relocated facilities. At the completion of the Proposed Project, the THWWTP site within the fence line will increase approximately 2-acres for a total of 3.2-acres. The Previous Project was estimated to result in an increase to the THWWTP site of 2.3-acres for a total area of approximately 3.5-acres. A significant portion of construction-related work will be to existing facilities and equipment, which will not require land disturbance activities.</p> <p>The existing and new THWWTP structures are located within the Target Hill and Siege Battery MRS'. Prior SEQR and NEPA assessments remain relevant and valid. Previously proposed measures will be implemented to mitigate impacts.</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| <p>Impacts on Surface Water</p> | <p>sediment and erosion control measures, although impacts to land will occur as a result of the project, no significant impacts to land are anticipated.</p> <p>The application would modify a SPDES permit (NY 0023761) to increase an existing surface discharge (Outfall 001), from 2.06 million gallons per day (MGD) to 2.8 MGD monthly average flow of treated sanitary wastewater and stormwater to the Hudson River in conjunction with the construction of a new WWTP adjacent to the existing Target Hill WWTP. The sewage collection system for Outfall 001 includes both separate and combined sewers. A second outfall adjacent to the South Dock Sewage Pump Station, Outfall 002, discharges combined sewage during severe rainfall events; no treatment is currently provided or proposed for this outfall.</p> <p>The new WWTP will provide advanced secondary treatment with screening, primary filtration, biological treatment, secondary clarification, bio solids digestion and dewatering, and UV disinfection prior to discharge of treated effluents. The proposed SPDES permit modification would add/change certain effluent limits and monitoring requirements contained in the current permit, including: monitoring requirements are added for Ammonia (as N) and TKN (as N), as well as an increase in sampling frequency; ammonia concentration and mass loading monthly average limits are added; effluent limits added for lead, copper, and zinc; and a schedule of compliance has been added for Ammonia, Total Chlorine Residual (TRC), wet effluent toxicity (WET) testing, and lead, copper, and zinc. Additional Best Management Practices (BMPs) have been added for operation of the</p> | <p>REDUCED IMPACT. Prior SEQR and NEPA assessments remain relevant and valid. NYSDEC permits for in-river work (Article 15, 401 Water Quality Certification) were issued on 11/30/2017. AW is coordinating submission of applications to modify the existing permits including the existing SPDES permit, which are based on proposed design criteria for the Proposed Project.</p> <p>Project changes, which will reduce previously evaluated/mitigated impacts consist of:</p> <ul style="list-style-type: none"> ▪ THWWTP effluent flow capacity will be reduced from the Previous Project (2.8 MGD ADF) to the Proposed Project (2.3 MGD ADF). ▪ THWWTP effluent piping, which previously included in-river trenching work to install two buried, parallel pipes, will now be installed through the existing land-based stormwater culvert to two parallel pipes anchored on the riverbed with precast collars. Adjacent to the proposed junction box, excavation will be required to maintain effluent piping below the elevation of anticipated ice accumulation. The pipes, installed via these less intrusive means and methods, will extend to the same effluent discharge point approved under current permits. |

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| | <p>new WWTP to maximize pollutant capture from combined sewer overflows (CSOs).</p> <p>In conjunction with construction of the new WWTP, a new outfall (Outfall 001) will be built from the reconstructed WWTP to the Hudson River (Class B), including approximately 300 linear feet (LF) of trenching on upland areas, and horizontal bore method to install two (2) new parallel 14" diameter pipes (approximately 51 LF) within the embankment of the Hudson River, allowing the sanitary discharge to occur below <i>high water</i> on the bed of the river. Adequate sediment, erosion and turbidity controls, including a proposed coffer dam system, are proposed which will allow outfall construction /to be performed in dry conditions, and to prevent silt sediment and/or turbidity from entering surface waters or the Hudson River during construction. Existing Outfall 001 is proposed to be abandoned in place with the exception of the last section of existing outfall piping which will be removed to the first joint.</p> <p>As indicated in the submitted short EAF, the entire 9.78-acre parcel will be disturbed in order to construct the replacement WWTP (adjacent to the existing WWTP), and to demolish and remove the existing WWTP upon completion of construction of the new WWTP. Therefore, as more than one acre will be disturbed, the applicant has developed a Stormwater Pollution Prevention Plan (SWPPP) that complies with the requirements of the current SPDES General Permit for Stormwater Discharges Associated with Construction Activity (GP-0-15-002). The SWPPP includes an erosion and sedimentation control plan which incorporates stormwater control measures to</p> | <p>In-water work associated with the new outfall for the Proposed Project will maintain the effluent discharge point included in the Previous Project. The NYSDEC has transferred in-river work permits to AW and extended expiration dates to 12/31/2023. USACE permits for in-river work (Sections 10 and 404) remain effective until 03/18/2022. Proposed mitigation measures, including adherence to permit conditions, remain valid.</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| <p>Impact to Air Resources/Air Quality</p> | <p>minimize stormwater related impacts to surface waters. Proper implementation of the SWPPP will protect surface waters during construction of the new Target Hill WWTP with new outfall to the Hudson River. Based upon improvements (advanced secondary treatment) proposed to existing wastewater treatment processes, new effluent and monitoring requirements contained in the proposed draft SPDES permit, and upon proposed sediment, erosion and turbidity control measures, no significant impacts to surface water are anticipated from constructing and operating the proposed new WWTP.</p> <p>At the proposed new WWTP, a 150-kilowatt (kW) co-generation system will be constructed to combust the biogas (methane) generated by process digesters, produce electricity with portion of waste ("reject") heat, and combust any excess methane with a new flare. The proposed permit modification would allow construction and operation of this new co-generation system, as well as other new air emission sources and odor control systems at the reconstructed Target Hill WWTP, including three (3) new carbon adsorption units to reduce odors generated by the WWTP, a diesel fueled generator, two (2) digester gas boilers, various heaters, and new flare to combust any excess methane gas not consumed in co-generation processes. The US Army Garrison at West Point anticipates that the proposed co-gen system will partially offset energy required to operate the new WWTP over its lifetime by production and capture of methane gas (a greenhouse gas by-product of WWTP sludge digestion processes), and utilization of this biofuel to run the sewage treatment plant.</p> | <p>NO CHANGE FROM EXISTING THWWTP. Air emission from the existing THWWTP are permitted by the NYSDEC pursuant to a Title V permit issued for site-wide emissions at the US Military Academy. AW is coordinating with the USAG at West Point and the NYSDEC to remove the THWWTP emission from the site-wide Title V permit and provide a THWWTP facility registration, which would be issued to AW.</p> <p>It is anticipated that rehabilitation of the existing THWWTP will result in improved emissions through the incorporation of newer, more efficient, equipment and processes. As concluded for the Previous Project, no significant impacts on air resources/air quality are anticipated from the Proposed Project. The proposed co-gen system has been removed from the Proposed Project eliminating an air emission source.</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| | <p>It should be noted that proposed emission sources at the new Target Hill WWTP are primarily replacements of existing emission sources, which existing sources will be decommissioned and removed upon completion of the new WWTP. Therefore, overall emissions from the WWTP site are not anticipated to change significantly due to the replacement of aging facilities with newer, more efficient, equipment and processes, including fuel and energy savings anticipated to accrue from the utilization of biofuel produced at the plant.</p> <p>Separate from the WWTP project, the permit modification also caps nitrogen oxide (NOx) emissions from two (2) new diesel fueled generators at the Athletic Department Maintenance Building. NOx emissions are limited within the proposed permit modification so that these generators are not subject to 6 NYCRR Part 231 New Source Review requirements. Emissions of ozone non-attainment pollutants from the WWTP project are below significant net emission increase thresholds, as specified in Part 231 New Source Review. In addition, hydrogen sulfide emissions from the WWTP are less than the Department's guideline concentrations, demonstrating compliance with Part 212 and that these emissions will not have an impact off site.</p> <p>Operation of the new WWTP, including operation of new emission sources, is not anticipated to degrade air quality regionally or cause deterioration of Orange County's attainment status with regard to NAAQS standards. No significant impacts to air quality are anticipated to occur as a result of constructing the new Target Hill WWTP project.</p> | |

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| <p>Threatened/ Endangered Species</p> | <p>The site of the proposed Target Hill WWTP is located less than 3/4 mile from a known occurrence of the Timber rattlesnake, a NYS threatened vertebrate animal. This mobile species can travel distances greater than one mile in search of food and basking habitat. Therefore, the potential exists for impacts to this NYS listed species. In order to avoid impact to timber rattlesnakes, the applicant will utilize a Department approved encounter and education plan for the Timber rattlesnake, including the posting of signage at the WWTP work location warning that snakes may be encountered, and steps to take if such encounter occurs. Further, DEC intends to include a Special Condition in any natural resource permit eventually issued for the project which will specify required actions and measures in the event a Timber rattlesnake is encountered. DEC accepts the above proposed measures as adequate protection for this threatened species for this project. No significant impacts to is, or other, NYS threatened and endangered species are anticipated.</p> <p>The NEPA FSNI indicated that, with the exception of the Atlantic and Shortnose Sturgeon, Timber Rattlesnake, Northern Long-Eared Bat, Bald Eagle, and other migratory birds, no other endangered or threatened species have been observed on or proximal to the project area. The FSNI concluded that the potential to impact observed species or other listed species is considered low.</p> <p>To minimize or eliminate construction-related impact to the Atlantic and Shortnose Sturgeon, as well as to a designated National Oceanic and Atmospheric Administration (NOAA) Essential Fish Habitat (EFH), while</p> | <p>NO CHANGE. Prior SEQR and NEPA assessments remain relevant and valid. Previously proposed measures will be implemented by AW and its contractors to mitigate impacts.</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| | <p>completing the installation of the new replacement outfall, the following measures will be implemented:</p> <ul style="list-style-type: none"> • Temporary control measures to mitigate for upland erosion and sedimentation to the Hudson River • A cofferdam (or other means to provide for work in dry conditions) will be utilized to install the new replacement outfall in the Hudson River. Best management practices will be utilized to minimize temporary vibratory impacts related to installation of cofferdam • An in-river work window between September through end of February • In-river sediment that is temporarily disturbed or removed as part of the installation of the pipelines in the Hudson River will be replaced in-kind. <p>USAG-West Point will inspect areas prior to clearing and inform contractor(s) of appropriate measures in dealing with wildlife, including the timber rattlesnake, as part of a comprehensive environmental briefing. USAG-West Point's Natural Resource Manager will meet with the construction project and safety managers to review the Timber Rattlesnake Encounter Plan including instructions on how to proceed in the presence of a snake and providing contact numbers and an information poster to be posted at the work site. A copy of the Timber Rattlesnake Encounter Plan and information poster was included in the NEPA EA.</p> <p>To minimize or eliminate impacts to Northern Long-Eared Bats, tree cutting will be restricted to November 1st – March 31st when the bat will be in hibernation at off-site</p> | |



| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| Cultural/Historical Resources | <p>hibernacula. Any tree removal associated with the project will be incidental. West Point will comply with the provisions of 50 CFR 17.40 (also referred to as 4(d) Rule) prior to removing any trees.</p> <p>To minimize or eliminate potential impacts to Bald Eagles and other migratory birds during construction, USAG-West Point will not conduct blasting activities during the period of December 1st through March 31st. Fully shielded light fixtures will be utilized to prevent glare and night-sky related light pollution.</p> <p>Potential impacts on common species and habitats are expected to be temporary and short-term lasting only during the length of the construction phase. Vegetative plantings will be restored following construction activities, and common wildlife species would be expected to return to the site. During construction, wildlife will continue to have travel corridors for movement around the project area.</p> <p>The US Army Garrison (USAG) at West Point site is a National Historic Landmark. To manage cultural resources, the USAG prepared an "Integrated Cultural Resources Management Plan" (ICRMP). Assessment of potential project related impacts on cultural resources is also guided by the "Programmatic Agreement Among the USAG West Point, the NYS OPRHP Officer, and the Advisory Council on the Historic Preservation Regarding Operations, Maintenance, and Development Activities, USAG, West Point, New York" (PA) executed in July 2016 between the above parties.</p> | <p>REDUCED IMPACT. The Proposed Project requires less land disturbance than the Previous Project (6-acres vs. 9-acres, respectively). The area of potential effect (APE) predominantly encompasses land substantially disturbed during prior work (field construction and WWTP original construction /subsequent upgrades).</p> <p>Similar to the Previous Project, the Proposed Project will impact a portion of the Target Hill Athletic Fields, a historic landscape that is a contributing element to the National Historic Landmark District. In regard to potential cultural</p> |

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| | <p>Based on records maintained by the NYS Office of Parks, Recreation and Historic Preservation (OPRHP) on-line Cultural Resource Information System (CRIS), the USAG West Point site, including the proposed Target Hill WWTP project, is listed in the National Register Building Sites inventory and is located within an area identified as "archeologically sensitive". The USAG site is also within the National Park Service's Hudson River Valley National Heritage Area. Included in the ICRMP noted above, is a cultural resource inventory for the entire West Point facility. The Target Hill athletic fields (adjacent to the existing WWTP) are identified in the inventory as a contributing element to the National Historic Landmark District as a historic landscape.</p> <p>The project has been designed to minimize impacts to green space (including the Target Hill Athletic Fields). The proposed new WWTP footprint (total area= 8.6 acres) maximizes use of existing impervious surfaces, including a portion of existing parking lot. However, the project will result in the overall net decrease of green space of one (1) acre (from 6.8 acres to 5.8 acres). Therefore, construction of the new [replacement] Target Hill WWTP will have an adverse effect on the Target Hill Athletic Fields, a historic landscape that is a contributing element to the National Historic Landmark District.</p> <p>The above noted Programmatic Agreement requires retaining the location of the existing Target Hill WWTP as open space after it has been demolished, and the development of an historic context for the athletic fields, including Target Hill, as recommended by the USAG West Point Historic Landscape Management Plan. In accordance</p> | <p>and historical impacts, the USAG at West Point operates under a Programmatic Agreement with State Historic Preservation Office (SHPO), dated August 25, 2017), which dictates mitigatory steps and processes "Minimizing and/or Mitigation Measure Modification Regarding the Replacement of the West Point Target Hill Wastewater Treatment Plan."</p> <p>AW has confirmed with the USAG at West Point that adherence to the previously-approved Programmatic Agreement will provide sufficient mitigation for the Proposed Project. Under the Previous Project, the existing WWTP was to be demolished; under the Proposed Project it will be rehabilitated. In comparison to the Previous Project, the Proposed Project will not result in any new types of impact or an increase in the magnitude of impact previously assessed.</p> |

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| <p>Other Environmental Considerations</p> | <p>with the above Programmatic Agreement, the US Army Garrison (USAG) at West Point has developed a letter of agreement with NYS OPRHP for the minimization and mitigation of the anticipated adverse effects from construction of the project. The letter agreement was then submitted to OPRHP for review and concurrence with the proposed measures. On August 24, 2017, the New York State OPRHP executed the letter agreement with USAG West Point. The executed letter agreement specifies minimization and/or mitigation measures which are required to be performed by the US Army Garrison (USAG) at West Point in order for the project to proceed. In addition, the Department intends to incorporate the required minimization and mitigation measures specified in the letter agreement into any natural resource permit (<i>i.e.</i>, Protection of Water Excavation/Fill) eventually issued for the Target Hill WWTP project.</p> <p>Based upon the foregoing, including the executed letter agreement between USAG West Point and NYS OPRHP and the Department's intention to incorporate OPRHPs required measures as permit conditions into any natural resource permit eventually issued for project, no significant impacts to cultural resources listed or eligible for listing on the State Register of Historic Places are anticipated.</p> | |
| | <p>While the US Department of the Army (US Army), as a federal agency, is not required to implement Part 617 SEQR regulations, the US Army must perform environmental review according to the National Environmental Policy Act (NEPA). In accordance with the NEPA, the US Army has conducted an environmental review of the proposal and has prepared a Draft</p> | <p>NO CHANGE. The USAG at West Point issued its NEPA FNSI for the Previous Project.</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| <p>Impacts to Other Resources</p> | <p>Environmental Assessment for the Target Hill Wastewater Treatment Plant (prepared by Atkins/O'Brien & Gere Joint Venture, dated May 2017). The public comment period has closed, and no comments were received on the Draft EA. It is anticipated by DE at the time of this writing that the Final EA will be adopted, along with a Finding of No Significant Impact (FONSI) for the project, by the US Army. The Draft Environmental Assessment for the Target Hill Wastewater Treatment Plant, including facts, conclusions and recommendations contained in the document, is hereby adopted by NYSDEC to further support DEC's issuance of this Negative Declaration and in satisfaction of its responsibilities as a SEQR involved agency.</p> <p>The proposed project will not cause any significant adverse impacts to the following resources: agricultural lands; energy resources; coastal resources; groundwater; solid waste production; visual/aesthetic resources; community character; open space or recreational resources; and critical environmental areas (CEAs). No other impacts were identified.</p> | <p>NO CHANGE. The Proposed Project remains consistent with the NYSDEC's determination relative to the Previous Project. In comparison to the Previous Project, the Proposed Project will not result in any new types of impact or an increase in the magnitude of impact previously assessed. Prior impact assessments and mitigation remain relevant and valid. Previously proposed measures will be implemented by AW and its contractors to mitigate impacts.</p> |
| <p>Impact on Land Use</p> | <p>SOURCE: NEPA FONSI</p> <p>Temporary disruption to the use of athletic fields during construction, as well as displacement of the fields due to the relocation of the WWTP. To implement the project, the remaining existing athletic fields located to the north of the new WWTP will be reconfigured to maximize their continued use. This area will include four athletic fields each approximately 120 feet by 240 feet in size. The area, which currently houses the existing WWTP and the</p> | <p>REDUCED IMPACT. Similar to the Previous Project, the Proposed Project will impact a portion of the Target Hill Athletic Fields. Under the Previous Project, the existing WWTP was to be demolished; under the Proposed Project it will be rehabilitated. In comparison to the Previous Project, the Proposed Project will not result in any</p> |

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| | <p>parking area to the south, will be converted to green space for recreational use with an asphalt connector road to Upton Road along the base of the existing slope. The purpose of this green space is to provide equitable recreational space to counterbalance a post-construction reduction in the current number of athletic fields.</p> <p>Potential flooding impacts due to the project's proximity to the Hudson River. Although no new buildings or surface structures are proposed within the 100-year flood elevation, it is anticipated that the finished floor elevation for the proposed WWTP will be raised above the 100-year flood elevation to provide additional flood protection and resiliency.</p> | <p>new types of impact or an increase in the magnitude of impact previously assessed.</p> |
| Flood Protection | | <p>NO CHANGE. Plant staff identified the observed historical high-water mark elevation at the THWWTP of 12.50', which is above the current 100-year flood elevation. Elevation 12.50' will be used as the high point for hydraulic profile calculations that will set water surface elevations throughout the upgraded plant. Flood protection measures will be considered as part of this upgrade for existing critical structures up to elevation 12.50'. Any new or major-modified structures will be built with a minimum top slab elevation of 14.50' (2' above observed historical high-water mark elevation based on Unified Facilities Criteria 3-201-01 Civil Engineering, Section 2-7.3, Table 2-1); there will be no unprotected openings below this elevation.</p> |
| Noise | <p>Noise from construction activities. Construction phase noise sources are anticipated, but considered short-term and intermittent and mitigated through implementation of the following controls: use and maintenance of appropriate mufflers on vehicles and equipment; adherence to construction hours; implementation of a Blast Plan, which will include noise-related mitigation measures; and compliance with USAG-WP's "Installation Operational Noise Management Plan" (IONMP) (April 2013).</p> | <p>REDUCED IMPACT. In comparison to the Previous Project, the Proposed Project will not result in any new types of impact or an increase in the magnitude of impact previously assessed. Prior NEPA assessments remain relevant and valid. While blasting is still required, the need will be significantly minimized relative to the Previous Project.</p> <p>Previously proposed measures will be implemented by AW and its contractors to mitigate impacts.</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| <p>Energy</p> | <p>No significant operational phase noise impacts were identified. Site operations will be conducted in accordance with the USAG-WP's IONMP. Aeration blowers will be housed in noise attenuating enclosures.</p> <p>No significant adverse energy-related impacts were identified. Implementation of the Proposed Action will result in a net reduction in energy use in comparison to existing conditions. The new WWTP will incorporate DoD Unified Facilities Code (UFC) sustainability requirements. In addition, the new Operations/Maintenance Building is expected to be Leadership in Energy and Environmental Design (LEED) Silver certifiable. The new building systems are expected to incorporate the objectives of the USAG-WP's net zero energy installation initiative. The initiative states that the USAG-WP will "implement Net Zero energy goals by calendar year 2020, while meeting energy mandates for renewable energy production and greenhouse gas (GHG) emissions reduction." Consistent with this goal, the project is expected to include enhanced digester gas utilization; specifically, the digestion of solids to generate methane gas, and the conversion of methane gas to electrical energy, which can be used at the new WWTP. In addition, the new WWTP will incorporate anaerobic digestion of food waste generated on the USAG-WP site, which will improve methane gas production and energy value. Additional improvements (under consideration) may include geothermal facilities to assist in the attainment of USAG-WP's sustainability goals.</p> | <p>REDUCED IMPACT. Building systems for the Proposed Project are anticipated to incorporate cost-effective energy-efficient components that focus on enhanced digester gas production and utilization. Other components such as solar, geothermal, wind, and/or influent/effluent wastewater heat exchange are not planned for the Proposed Project. The energy demands for the plant will partially offset the load utilizing methane recovery. In addition, the reduced WWTP effluent flow capacity (from previously approved 2.8 MGD ADF to 2.3 MGD ADF) will reduce future energy demands as compared to the Previous Project. Rehabilitation of the existing WWTP should also result in less energy use during construction in comparison to construction of a new WWTP.</p> |
| <p>Hazardous Materials and Wastes</p> | <p>Potential to encounter impacted soils, groundwater and river sediments during construction and dewatering activities, as well as explosive hazards and risks from Munitions and Explosives of Concern (MEC) and Munitions</p> | <p>REDUCED IMPACT. It is anticipated that the Proposed Project will result in less disturbance of lands potentially impacted by prior activities. In comparison to the Previous</p> |

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| | <p>Constituents (MC). If impacted soil, groundwater or river sediments are encountered, it will be managed in accordance with applicable federal, State, local and DoD AR 200-1 requirements. The policy requires the preparation and implementation of a Construction Health and Safety Plan (CHASP) to protect construction workers and the community from exposure to potential impacted materials. If impacted river sediments are encountered during construction and dewatering activities, they will be disposed of in accordance with applicable federal, State, local and DoD AR 200-1 requirements. Per discussions with NYSDEC, no soils will be removed from the site. With respect to MECs and MCs and as described in the USAG-WP's "Non-Time Critical Removal Action Land Use Control Plan" (October 2012), required dig permit(s) will be obtained through USAG-WP Directorate of Public Works (DPW), Environmental Management Division and work will be performed in accordance with the dig permit. This may include unexploded ordnance (UXO) awareness training and support from the Explosive Ordnance Disposal (EOD) unit.</p> <p>Management of C&D and Solid (non-hazardous) waste streams. The contractor will be required to dispose of these materials off-site at an appropriately permitted landfill, diverting as much as possible from landfills by reuse or recycling. A minimum target of 60% diversion for C&D wastes (Installation Management Command [IMCOM] Operations Order 14-067: Integrated [Non-Hazardous] Solid Waste Management; paragraph 3.C.2.I.1) will be included in project specifications. Consistent with USAG-WP requirements, the contractor will be required to develop and implement a C&D Waste</p> | <p>Project, the Proposed Project will not result in any new types of impact or an increase in the magnitude of impact previously assessed. Prior NEPA assessments remain relevant and valid.</p> <p>Previously proposed measures will be implemented by AW and its contractors to mitigate impacts.</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| <p>Traffic and Transportation Systems</p> | <p>Management Plan including the provision of records as to how much C&D (including rock) is removed from the project site.</p> <p>Solid waste generated at the new WWTP will be hauled by a contractor to an Army-owned, contractor-operated transfer facility on the installation and, ultimately, to a State-permitted landfill. Dewatered sludge from the sewage treatment facilities will continue to be composted in accordance with applicable regulations. Additional dewatering sludge waste may be generated based on the increased capacity of the proposed WWTP.</p> <p>Food wastes will be collected from various cafeterias at USAG-WP by DPW staff for transport to the new WWTP. The wastes will be accepted at the WWTP's solids dump station (SDS) for incorporation into the anaerobic digestion treatment system.</p> <p>Chemicals and other potentially hazardous materials utilized during construction and operation of the WWTP will be stored, handled and managed in accordance with USAG-WP's hazardous materials management system (HMMS) and applicable Federal, State and local laws and regulations. Use of herbicides and pesticides will be in accordance with USAG-WP's Integrated Pest Management Plan (March 2011).</p> <p>Temporary impacts to local traffic flow within the base and local community due to increase trips accessing and egressing the project site (construction workers and equipment, removal of spoils and waste materials). Construction-related impacts on traffic will be short-term; lasting only during the duration of construction phase</p> | <p>NO CHANGE. Prior NEPA assessments remain relevant and valid. Previously proposed measures will be implemented by AW and its contractors to mitigate impacts.</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
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| <p>Coastal Resources</p> | <p>activities. Worker and visitor related traffic, as well as material supply traffic during operations, is anticipated to be similar in magnitude and timing to existing conditions.</p> <p>Construction phase impacts will be mitigated through implementation of the following measures: adherence to specified access/egress routes; coordination with the Military Police and USAG-WP community to minimize of temporary traffic disruptions; advanced registration of construction vehicles and individual drivers; deployment of detour signs and flaggers, as necessary including the preparation, if necessary, of a "Maintenance and Protection of Traffic Plan;" use of construction vehicles equipped with backing alarms, two-way radios, and Slow Moving Vehicle signs; the postponement of construction activities, if necessary, during home games, and special events to minimize pedestrian traffic disruptions; and storage of heavy equipment at the temporary construction staging area, to the extent possible, to minimize the amount of slow-moving vehicles on Upton Road.</p> | <p>REDUCED IMPACT. Prior NEPA and coastal consistency review assessments remain relevant and valid. The project will maintain the effluent discharge point included in the Previous Project. Previously permitted outfall discharge point and discharge remains the same. Proposed mitigation measures, including adherence to permit conditions, remain valid. In addition, rehabilitation of the existing WWTP should result in less impacts than the additive construction of the previously proposed new WWTP.</p> |

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| | <p>use at its existing location. The continued siting of the WWTP proximal to the Hudson River is ideal given that treated effluent will continue to be discharged to the Hudson River via the new, replacement outfall. It is anticipated that existing effluent limits will be maintained.</p> <p>In addition, the USAG-WP is located within the Hudson Highlands Scenic Area of Statewide Significance, which is covered under Policy No. 24 of the State's Coastal Management Program. The Proposed Action was evaluated for its consistency with the State's policies and a "Negative Determination" drafted for submission to the NYSDOS. A copy of the assessment was included as an appendix to the Final EA.</p> | <p>Previously proposed measures will be implemented by AW and its contractors to mitigate impacts.</p> |
| <p>Aesthetic and Visual Resources</p> | <p>Potential impacts related to aesthetics, the existing viewshed and from proposed lighting. The proposed architectural design is consistent with the scale, materials and styles representative of existing buildings within the Target Hill and Shea Stadium Areas. In addition, the proposed WWTP does not sharply contrast with the existing viewshed and will not be overly obvious from various identified vantage points (including Constitution Island). Materials and lighting will conform to the <i>United States Military Academy Design Guide, United States Army Garrison Engineering Planning Standards</i> and the <i>Garrison Commander's Guidelines for Outdoor Lighting at West Point</i>.</p> | <p>REDUCED IMPACT. In comparison to the Previous Project, the Proposed Project will not result in any new types of impact or an increase in the magnitude of impact previously assessed. Prior NEPA assessments remain relevant and valid. In addition, rehabilitation of the existing WWTP should result in less impacts than the additive construction of a new WWTP.</p> <p>Previously proposed measures will be implemented by AW and its contractors to mitigate impacts.</p> |
| <p>Utilities</p> | <p>Potential impacts on utility capacities. Existing utilities have sufficient capacity to support the Proposed Action. Natural gas and sanitary sewer infrastructure will be extended and rerouted to the site, respectively. The existing potable water line will be replaced, and the water</p> | <p>REDUCED IMPACT. In comparison to the Previous Project, the Proposed Project will not result in any new types of impact or demand on utilities. There will be no increase in the magnitude of impact previously assessed. Utility work associated with the Proposed Project is</p> |

| Category | Previous Project (New THWWTP) | Proposed Project (Existing THWWTP Rehabilitation) |
|--------------------|--|--|
| <p>Odor</p> | <p>supply system will be designed to provide adequate pressure to support fire suppression needs.</p> <p>Potential odors from WWTP operations. Operations at the new WWTP will replace operations at the existing facility. Potential odor impacts from WWTP operations will be mitigated by the installation of three carbon adsorption units. Two odor control unit will serve the influent liquid treatment area (<i>i.e.</i>, the headworks, influent pumping station (IPS), and primary treatment). The third unit will serve specific solids treatment systems (<i>i.e.</i>, the sludge storage tanks, solids dump station (SDS), and potentially the sidestream treatment system. Besides hydrogen sulfide (H2S) and ammonia, additional constituents can be polished including: carbonyl sulfide, methyl mercaptan, ethyl mercaptan, dimethyl sulfide, carbonyl disulfide, or dimethyl disulfide.</p> <p>Food related waste, used in the anaerobic digestion process to improve methane gas production and energy value, will be accepted at the SDS, which is part of the overall Solids Handling Building (SHB) odor control system.</p> | <p>substantially similar to work proposed in the Previous Project; although the length of required utility extensions has been reduced resulting in less disturbance.</p> <p>NO CHANGE FROM EXISTING THWWTP. In comparison to the current WWTP, the Proposed Project will not result in any new types of impact or an increase in the magnitude impact. Odor control units planned in the Previous Project are not included in the Proposed Project. Food related waste is planned to be accepted at the Solids Dump Station.</p> |

TARGET HILL WWTP UPGRADE PROJECT - GOVERNMENT APPROVALS LISTING FOR PROJECT ID: 123456789

**ATTACHMENT 3
GOVERNMENT APPROVALS**

| | | |
|--|--|---|
| <p>Proposed Project - Approval for design under Part 215 of the Environmental Conservation Law (ECL) and the NYS DEC. The project is located on federal land, therefore, local permits/approvals are not required.</p> | <p>Section 401 of the Clean Water Act Section 10 of the Rivers & Harbors Act of 1899</p> | <p>Federal - United States Army Corps of Engineers (USACE)</p> |
| <p>Proposed Project - Modify approvals to incorporate less intrusive means and methods to install the previously approved THWTP outfall and transfer to AW.</p> | <p>Section 401 of the Clean Water Act (401 Water Quality Certification) New York Codes, Rules and Regulations (NYCRR) Part 608, Article 15 of the Environmental Conservation Law (ECL)</p> | <p>New York State Department of Environmental Conservation (NYSDEC)</p> |
| <p>Proposed Project - Registration application for late permit submitted to NYSED on 4/1/2021.</p> | <p>NYS Air Facility Registration (see discussion with NYSED)</p> | <p>New York State Department of Environmental Conservation (NYSDEC)</p> |
| <p>Proposed Project - Application to be submitted upon completion of construction ready contract documents.</p> | <p>SPDES General Permit (GP) for Storm Water Discharges from Construction Activity (GP-0-20-001)</p> | <p>New York State Department of Environmental Conservation (NYSDEC)</p> |
| <p>Proposed Project - Regulatory review set anticipated to be submitted April 29, 2021.</p> | <p>System Approval of Plans & Specifications (SAPS) (NYCRR Part 625)</p> | <p>New York State Department of Environmental Conservation (NYSDEC)</p> |

TARGET HILL WWTP UPGRADE PROJECT – GOVERNMENT APPROVALS, FUNDING OR SPONSORSHIP

| Agency | Approvals | Status |
|---|---|---|
| <p>Federal - United States Army Corps of Engineers (USACE)</p> | <p>Section 404 of the Clean Water Act</p> <p>Section 10 of the Rivers & Harbors Act of 1899</p> | <p>Previous Project - Approval for coverage under NWP #7 via Memo from USACE to Garrison Commander. Valid until 3/18/2022.</p> <p>Proposed Project – Based on correspondence with the USACE regarding the proposed modifications to the in-water work, proposed outfall design modifications can proceed under the previously issued Nationwide Permit verification, as long as the previously approved disturbance quantities remain below the approved thresholds, which they do.</p> |
| <p>New York State Department of Environmental Conservation (NYSDEC)</p> | <p>Section 401 of the Clean Water Act (401 Water Quality Certification)</p> <p>Protection of Waters (6 New York Codes, Rules and Regulations [NYCRR] Part 608; Article 15 of the Environmental Conservation Law [ECL])</p> <p>Individual State Pollutant Discharge Elimination System (SPDES) Permit (Modification) (6 NYCRR Part 750)</p> <p>NYS Air Facility Registration (per discussion with NYSDEC)</p> <p>SPDES General Permit (GP) for Storm Water Discharges from Construction Activity (GP-0-20-001)</p> <p>Wastewater Disposal System (Approval of Plans & Specifications) (6 NYCRR Part 652)</p> | <p>Previous Project - Permit IDs 3-3336-00022/00081 and 3-3336-00022/00082. Exp. 12/31/2023.</p> <p>Proposed Project – Modify approvals to incorporate less intrusive means and methods to install the previously approved THWWTP outfall and transfer to AW.</p> <p>Modify the existing SPDES Permit (NY0023761) to address proposed expansion and upgrades to the THWWTP. Current SPDES Permit expires 12/31/2021.</p> <p>Proposed project - Registration application for flare permit submitted to NYSDEC on 4/7/2021.</p> <p>Proposed project - Application to be submitted upon completion of construction ready contract documents.</p> <p>Proposed project - Regulatory review set anticipated to be submitted April 29, 2021.</p> |
| <p>Project is located on federal land; therefore, local permits/approvals are not required.</p> | | |

To: [Name]
 From: [Name]
 Subject: [Subject]
 Date: [Date]
 Time: [Time]

**EXHIBIT C
USACE RESPONSE**

The existing Wave 7 letter allows for the discharge of fill material into 1100 square feet of the river for the outfall structure and also allows for 1200 square feet of trenching for the installation of the new line. It also allows for 1800 square feet of temporary dewatering. As long as the currently proposed work would not impact more than what the existing NWP 7 letter allows for, it's not necessary to obtain a new NWP confirmation.

Brian A. O'Neil
 Project Manager, Civil Engineer
 NY District's Army Corps of Engineers
 Regulatory Branch
 26 Federal Plaza, Room 15-408
 New York, New York 10278-0090

Please note in order to ensure our continuity of operations and improve the timeliness of permit application reviews due to the current COVID-19 virus, effective immediately, the New York District, U.S. Army Corps of Engineers is requiring that all new permit applications be submitted to the New York District electronically. Until further notice, the New York District will no longer process any paper permit applications. This electronic processing procedure will increase the efficiency of correspondence, furthering the goal of providing timely decisions. Please see the link below to the Regulatory Branch Operational Modification Special Public Notice describing the instructions for electronic application submission:

<https://www.usace.army.mil/portal/37/docs/regulatory/publicnotices/non%20paper%20electronic%20application%207MAR2020.pdf?ver=2020-03-31>

From: Steve Ecker <Steve.Ecker@army.mil>
 Sent: Wednesday, February 13, 2021 7:21 AM

Steve Eckler

From: Orzel, Brian A CIV USARMY CENAN (USA) <Brian.A.Orzel@usace.army.mil>
Sent: Thursday, February 18, 2021 7:33 PM
To: Steve Eckler
Cc: Colin Lautz; Christy Rosenbarker
Subject: RE: United States Army Garrison at West Point - Target Hill Wastewater Treatment Plant (WWTP)

Steve,

The NWP verification letter/memo was issued to the USMA. But in reality, the NWP confirmed that the proposed work was applicable to NWP 7. So, it really doesn't matter who the recipient of the letter was. The recipient therefore does not need to be redesignated. The existing NWP 7 letter still stands.

The existing NWP 7 letter allows for the discharge of fill material into 1100 square feet of the river for the outfall structure and scour pad. It also allows for 1200 square feet of trenching for the installation of the new line. It also allows for 2800 square feet of temporary dewatering. As long as the currently proposed work would not impact more than what the existing NWP 7 letter allows for, it's not necessary to obtain a new NWP confirmation.

Brian

Brian A. Orzel
Project Manager, Civil Engineer
NY District US Army Corps of Engineers
Regulatory Branch
26 Federal Plaza, Room 16-406
New York, New York 10278-0090

Please note in order to ensure our continuity of operations and improve the timeliness of permit application reviews due to the current COVID-19 virus, effective immediately, the New York District, U.S. Army Corps of Engineers is requiring that all new permit applications be submitted to the New York District electronically. Until further notice, the New York District will no longer process any paper permit applications. This electronic processing procedure will increase the efficiency of correspondence, furthering the goal of providing timely decisions. Please see the link below to the Regulatory Branch Operational Modification Special Public Notice describing the instructions for electronic application submittals:

<https://www.nan.usace.army.mil/Portals/37/docs/regulatory/publicnotices/Non%20Project%20Specific/2020/CENAN-OP-R%20PN%20Electronic%20Submission%20of%20Permit%20Applications%2027MAR2020.pdf?ver=2020-03-31-163215-913>.

From: Steve Eckler <Steve.Eckler@ramboll.com>
Sent: Wednesday, February 17, 2021 7:57 AM

To: Orzel, Brian A CIV USARMY CENAN (USA) <Brian.A.Orzel@usace.army.mil>
Cc: Colin Lautz <Colin.Lautz@ramboll.com>; Christy Rosenbarker <Christy.Rosenbarker@ramboll.com>
Subject: [Non-DoD Source] United States Army Garrison at West Point - Target Hill Wastewater Treatment Plant (WWTP)

Hi Brian. Hope all is well with you.

We wanted to update you on activities associated with the Target Hill WWTP. I believe our last communication regarding the project was the Corps' verification that installation of the WWTP outfall and associated scour pad in the Hudson River could proceed under Nationwide Permit No. 7. I attached that memorandum dated July 31, 2017, which remains valid until March 18, 2022.

Ramboll (formerly O'Brien & Gere Engineers) continues to work with the Garrison to advance the project. Under the current scenario, American Water (AW), which currently operates the existing WWTP will oversee the rehabilitation of and upgrades to the existing facility; construction of a new WWTP is no longer proposed.

In regard to the USACE's jurisdiction under Section 404 of the Clean Water Act and Section 10 of the Rivers & Harbors Act of 1899, AW continues to propose installation of a new outfall in the Hudson River. The location of the outfall discharge remains the same as previously authorized by the USACE and New York State Department of Environmental Conservation (NYSDEC); however, the proposed means and methods to install the outfall have changed, in part, to further mitigate potential short-term, construction-related impacts within the river.

The previously approved river work included installation via coffer dam/trenching of dual, parallel 14-inch diameter reinforced concrete pipes, which would extend from a junction box to the proposed outfall and scour pad. The Proposed Project incorporates less intrusive means and methods to install the outfall piping. THWWTP effluent piping under the revised Project will be routed through the existing land-based stormwater culvert to the junction box and ultimately to the same effluent discharge point approved under current permits. Instead of trenching, two 14-inch diameter HDPE pipes fabricated on a barge will be floated into position and submerged in a controlled manner to the final locations. Effluent piping in the river will be anchored utilizing precast concrete collars. Temporary measures such as sand bags, porta-dam or similar will be utilized to install the new junction box and associated piping connections. Turbidity curtains will be utilized during piping installation in the river.

The Garrison is currently reviewing the revised project pursuant to the National Environmental Policy Act. Based on our conversations, it is likely that the Garrison will issue a Record of Environmental Consideration (REC) based on the prior evaluation.

We are coordinating with the NYSDEC to identify any need to modify previously issued permits (Article 15, 401 Water Quality Certification); the existing permits were recently extended and transferred to AW, but do not currently account for the outfall piping design change.

Our ask to you is the same. Is there a need to modify the existing Nationwide Permit verification and transfer to AW? We are currently updating drawings, which can be submitted to the USACE. We are also available to discuss this further. Please advise. Thanks.

Steve Eckler

DIRECTOR

D 315-956-6421
M 315-416-1908
steve.eckler@ramboll.com

Connect with us 

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EXHIBIT D
SUPPORTING DRAWINGS

