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Date: March 20, 2024

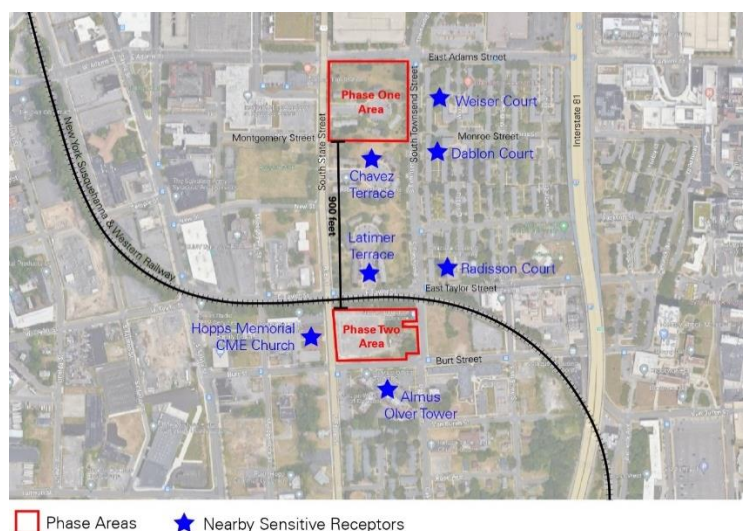
Re: East Adams Redevelopment – Phase I, Phase II and future new road Areas
100-199 Angelou Terrace and 341 Burt Street
Syracuse, New York
Langan Project No.: 170784003

INTRODUCTION

East Adams Phase I, L.P. and East Adams Phase II, L.P. – two limited partnerships formed between McCormack Baron Salazar and the Syracuse Housing Authority (SHA) – are proposing to redevelop two sites into affordable housing in the 15th Ward in Syracuse, New York. To enable the project, discretionary actions are being sought from local, county, state, and federal agencies. The actions are subject to State Environmental Quality Review pursuant to Part 617 of the New York Codes, Rules, and Regulations and an environmental review pursuant to the National Environmental Policy Act Part 58 of the Code of Federal Regulations.

As shown in Figure 1, the Phase One and Phase Two areas are about 900 feet apart.

Figure 1: Location Map



Documents referenced in this memo can be downloaded at the link below:

<https://clients.langan.com/Sharing/filessharing/ViewPosted?transactionHash=518844975>

NEARBY SENSITIVE RECEPTORS

The sensitive receptors nearest to both areas are SHA residences. For Phase One Area, Chavez Terrace is about 60 feet to the south and Weiser Court and Dablon Court are about 100 feet to the east across South Townsend Street. For Phase Two Area, the nearest residences are located in the Almus Olver Tower, about 80 feet to the south across Burt Street. Latimer Terrace is about 100 to the north, across the elevated railway. Hopps Memorial CME Church is about 60 feet to the west across South State Street.

AIR QUALITY AND NOISE

Although the potential exists for some elevated noise levels and increased air emissions during construction, the impacts will be similar to typical multiple-family residential construction projects in urban environments. The mitigation measures discussed in this memorandum will further mitigate these impacts and adequately address noise and air quality issues to the extent practicable.

Generally, construction will take place Monday through Friday from 7 am to 5 pm. Occasionally, construction activities may take place on Saturdays or between 7 am and 5pm on weekdays, but only when done in accordance with approved permits issued by the City of Syracuse. Demolition is anticipated to take about one month in the Phase One Area. Since only two small structures currently exist at the Phase Two Area, only minor demolition is anticipated, which will take approximately three days. The existing paved parking area would be milled and removed over about one week.

In order to reduce noise levels and air emissions, the Applicant will adhere to the following protocols during construction:

- Small portable generators may be used intermittently during construction. However, we intend on using a temporary electric hookup as soon as possible to reduce or eliminate the need for generators.
- Trucks will be prohibited from idling outside of the construction sites
- Best management practices such as spraying water or temporarily stopping work will be used to reduce dust on and around the construction site.
- Stationary Reciprocating Internal Combustion Engines (RICE) generators are not planned to be used and therefore an air permit from NYSDEC is not required.
- Since the Phase Two Area will be enrolled in the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP), the Applicant will adhere to the requirements of this program, which include the implementation of a community air monitoring program (CAMP) under the oversight of the NYSDEC. The

CAMP will monitor dust emissions and volatile organic compounds (VOCs) on and around the project site.

- The effects of air emissions and noise generally decrease as the distance from the sources increase. To the extent practicable, construction equipment would be placed as far as possible from nearby sensitive receptors that have a direct line-of-sight to the construction area. In the Phase Two Area, the rail line to the north is on top of a berm, which precludes direct line-of-sight between the Phase Two Area and areas to the north. This berm can be used as a noise barrier and reduces the potential for air emissions and noise to impact areas to the north.

With these measures in place, the Applicant will minimize the effects of construction-generated air emissions and noise. Furthermore, the buildings were designed with adequate noise attenuation such that the interior noise levels will not exceed an average sound level of 45 decibels, which is the noise standard set forth by the U.S. Department of Housing and Urban Development (“HUD”) for multi-family housing.

CONTAMINATION

Phase One Area

In preparation for redevelopment, a Phase I Environmental Site Assessment (ESA) was completed by EA Engineering, P.C. and Its Affiliate EA Science and Technology (EA) in May 2023. The purpose of the Phase I ESA was to identify any environmental concerns with the property that need to be addressed during redevelopment. The Phase I ESA identified former uses on and nearby the site that could have environmentally impacted the property.

A Phase II Environmental Site Investigation (ESI) was completed in July 2023 to investigate the potential for environmental impacts identified in the Phase I ESA. The Phase II ESI included soil, groundwater and soil vapor testing. The Phase II ESI is provided as Attachment A.

Analytical testing did not identify impacts associated with the former use of the property or surrounding properties. Soil and groundwater sample results were below applicable regulatory standards for residential use. Trichloroethylene, a volatile organic compound (VOC) was detected at a concentration that may warrant mitigation; therefore, a soil gas mitigation system has been designed as recommended in the Phase II ESI.

The Phase II ESI was submitted to the NYSDEC on November 14, 2023 to verify that cleanup at the site would not be required and the NYSDEC confirmed that remediation would not be required since soil and groundwater at the property met applicable standards.

By letter dated March 19, 2024 (Attachment B), NYSDEC confirmed that the redevelopment of the Phase One Area into multi-family housing necessitates meeting the Restricted Residential Use Soil Cleanup Objectives and that the soil in the Phase One Area does not exceed the Restricted Residential Use Soil Cleanup Objectives. In addition, NYSDEC confirmed that remediation of the groundwater at the Phase One Area is not required. NYSDEC also stated that

remediation of soil vapor/soil gas is not required. However, as discussed above, as a precautionary measure a vapor mitigation system will be installed in the Phase One Area.

While not required for site remediation, surficial soil at the property will be graded as part of future development. Any excess soil being removed from the site will be sampled, characterized, and properly disposed of in accordance with applicable local, state, and federal regulations.

Phase Two Area

In preparation for redevelopment, a Phase I ESA was prepared for the Phase Two Area by EA in May 2023. The Phase I ESA identified former industrial and commercial uses on the property and nearby the property, and former on-site petroleum bulk storage as operations that could have environmentally impacted the property.

A Phase II Environmental Site Investigation (ESI) was completed in July 2023 to investigate the potential for environmental impacts identified in the Phase I ESA. The Phase II ESI, provided as Attachment C, included soil, groundwater and soil vapor testing. In addition, data from previous investigations, including an October 1995 Phase II Environmental Site Investigation (ESI) conducted by O'Brien & Gere Engineers, Inc., and an April 2003 subsurface investigation conducted by Stearns & Wheler, were reviewed. Petroleum impacts attributed to former underground storage tanks were identified in soil on the northwestern and southwestern parts of the site, and semivolatile organic compounds (SVOCs) and metals were also identified in soil across the site at concentrations above applicable guidance values. Petroleum-related volatile organic compounds (VOCs) were also identified in groundwater above applicable standards and guidance values.

The analytical data was submitted to the NYSDEC on January 9, 2024 to determine if the property was eligible for cleanup under the BCP. According to NYSDEC personnel, the acceptance letter is currently being prepared. As part of the BCP, additional investigation will be completed to determine the nature and extent of contamination at the site and a Remedial Action Work Plan (RAWP) will be prepared outlining how cleanup at the site will be achieved. The RAWP will include protocols for the removal of contaminated soil and the design of a vapor mitigation system.

At the conclusion of remediation, the NYSDEC will issue a Certificate of Completion (COC) indicating satisfactory cleanup per the remedial design. If necessary, the site will be managed under a Site Management Plan (SMP) that outlines any engineering or institutional controls required to prevent occupants from exposure to any residual contamination.

NEW YORK STATE PARKS, RECREATION AND HISTORIC PRESERVATION

A review request letter was sent to the New York State Historic Preservation Office (SHPO) on May 1, 2023, as part of the National Environmental Policy Act (NEPA) review. By letters dated June 1, 2023 (Attachments D and E), the New York State Parks, Recreation and Historic Preservation stated that no historic properties, including archaeological and/or historic resources, will be affected by the construction of the Phase One Area or Phase Two Area.

ENVIRONMENTAL JUSTICE

Both the Phase One and Phase Two areas are in “environmental justice areas,” as defined by the NYSDEC. Additionally, the United States Environmental Protection Agency’s EJ Screen Mapping Tool confirmed that both areas are within the:

- 95th percentile for “low-income.”
- 69th percentile for “people of color.”
- 87th percentile for proximity to hazardous waste management facilities
- 86th percentile for proximity to Superfund sites

The East Adams Transformation Plan was initiated by the City of Syracuse to provide a comprehensive approach to the revitalization of the East Adams neighborhood, an area that includes five SHA communities. Community members have been notified about the Transformation Plan through fact sheets and community meetings held by the City of Syracuse. To date, public participation focus groups, workshops, and presentations hosted by SHA have provided an opportunity for stakeholders to participate. During the planning process, the City identified and studied reasonable alternatives.

The Transformation Plan identified a need to renovate and repair SHA properties and to expand affordable housing options. The plan seeks to incorporate a variety of housing types in the neighborhood within the larger mixed-use commercial and residential neighborhood of the 13th Ward.

A community needs survey completed by SHA determined that Phase One Area – currently occupied by 24 housing units that comprise McKinney Manor – would require more than \$17 million dollars in deferred maintenance. The Syracuse Housing Authority concluded that redevelopment of the site with new townhomes and a multifamily building was the preferred alternative to achieve the goals of the Transformation Plan.

Phase Two Area is vacant and the City of Syracuse determined that the area is suitable for affordable and supportive housing. Multistory apartment buildings and mixed-use development along East Adams Street were selected to accommodate the community’s need for more housing.

The Phase 2 Area will undergo further environmental investigation and remediation under the NYSDEC BCP. The BCP has stringent citizen participation requirements including public comment periods for document review and fact sheets issued by the NYSDEC to inform the community of findings and next steps in the program.

The proposed project will be constructed with modern materials and methods that minimize adverse health and environmental effects. While the project will temporarily generate air and noise emissions during the construction, these emissions will be typical of new residential development and will result in new affordable housing opportunities in an environmental justice area. Thus, the project does not conflict with environmental justice goals of the state or the United States Environmental Protection Agency.