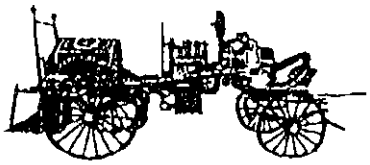
Appendix B

Correspondence



Carmel Fire Department, Inc.

94 Glenida Avenue
Carmel, New York 10512
(845) 225-5100
FAX: 845-225-2252

Established 1915

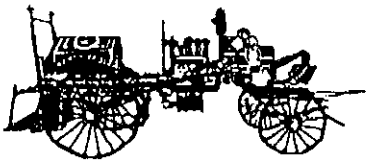
Tina Wang, Planner
Tim Miller Associates, Inc.
10 North Street
Cold Spring New York 10516
(845) 265-4400

June 5,2003

Dear Tina,

As per your letter dated April 23, 2003, **Re: Proposed Gateway Summit and the Fairways, Town of Carmel**, the Carmel Fire Department has numerous concerns.

1) First is the concern of water supply. During the construction of the Centennial Golf Course the Carmel Fire Department voiced concern that the dead end system in place now will not adequately supply water for fire protection. We suggested at that time that the system be looped, meaning the supply line connects to two different water mains. Once again if this project goes through, we are strongly recommending that the system be looped. Hydrants should also be in place along Route 6 to the end of the district.
2) Along with looping the system there is the concern of the water towers, are three water towers adequate to supply and have storage with a project of this magnitude. The town engineer should review this situation and certify that the water supply and pressure are adequate.
3) We do not have enough pumpers nor do they have the pump capacity to protect these proposed building and a development of this size in our community. To protect a hotel/conference center, along with a YMCA and retail space, the fire department will need assistance in pursuing a substation and an additional pumper along the Route 6 corridor.
4) Traffic is another of our major concerns. Not only will this lead to an increase in car accidents, but to a slow down in our response as a department and for members trying to reach the department to respond. Both Fair Street and Route 6 already have congestion problems, this will just add to this.
5) The "Fairways Senior Housing Project" will be given tax exempt status most likely from the town and county. Senior housing taxes our services with additional calls. We can not afford to further tax our system without revenue.



Carmel Fire Department, Inc.

94 Gleneida Avenue
Carmel, New York 10512
(845) 225-5100
FAX: 845-225-2252

Established 1915

At present the Carmel Fire Department houses 3 engine/pumpers, 1 ladder truck, 1 rescue, 1 tanker, and 1 brush truck. We have one house located at the corner of Route 52 and Vink Drive. In the last three years our call volume has shown a steady increase from 221, 279,307 calls respectively.

Feel free to contact me if you have any questions or need further information. Thank you for your attention to our concerns.

cc: Mr. Harold Gary
Chairman
Town of Camel Planning Board

1st Assistant Chief

Robert Lipton Sr.

Deputy Town Supervisor

STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL
(518) 474-4843

ELIOT SPITZER
Attorney General

DIVISION OF PUBLIC ADVOCACY
ENVIRONMENTAL PROTECTION BUREAU

March 26, 2003

Mr. Harold Gary
Chairman, Town of Carmel Planning Board
McAlpin Avenue
Mahopac, New York 10541

Re: SEQRA Draft Scope for Gateway Summit
and The Fairways, Carmel, New York

Dear Mr. Gary:

Enclosed please find our comments on the scope of the draft environmental impact statement for the proposed Gateway Summit and The Fairways Project in the Town of Carmel. Given the significant impacts that this proposed development would have on the New York City Watershed, we very much appreciate that the Town of Carmel has provided this public comment opportunity. Please be so kind as to keep us informed of all documents and proceedings associated with this SEQRA review.

Should you have any questions or if we can be of any further assistance please do not hesitate to call.

Very truly yours,

James M. Tierney
NYC Watershed Inspector General
Assistant Attorney General

Charles D. Silver, Ph.D.
Environmental Scientists III

cc: Sandra Allen, DEC
Cathleen Breen, NYPIRG
P. Carmada, Mid-Hudson Realty Corp.
James Covey, DOH
Robert Cronin, DEC
Eric Goldstein, NRDC
Jeffrey Gratz, EPA
William Harding, WPPC
Mark Hoffer, DEP
Robert F. Kennedy, Jr., Riverkeeper
P. Leibowits, Centennial Golf Clubs of NY, LLC
Marc Moran, DEC
Michael Principe, DEP
Gary Tretsch, Putnam Engineering, PLLC
Mark Yaggie, Riverkeeper

SEQRA Scoping Comments for the Draft EIS
Gateway Summit and The Fairways
Town of Carmel
Putnam County, New York

Comments of the Office of Watershed Inspector General

March 26, 2003

Thank you for providing this opportunity to submit comments concerning the appropriate scope and detail of the draft environmental impact statement ("draft EIS") with respect to the proposed Gateway Summit and The Fairways project (the "Project").

The proposed Project is located entirely within the New York City Watershed ("Watershed"), an area that comprises only 4.2% of New York's lands yet serves as the source of drinking water for over 9 million residents. Runoff from the proposed Project drains into the Middle Branch Reservoir that is part of the Croton Watershed . This is an *unfiltered* drinking water source for approximately 900,000 people on an average daily basis and as the source of drinking water for upwards of 2 million people during drought or emergency conditions. The only treatment this water currently receives from reservoir to tap is disinfection through chlorination. The New York State Department of Environmental Conservation ("DEC") surface water classification of the Middle Branch Reservoir is as a class "A" water body. Therefore, pursuant to its state classification, the Middle Branch Reservoir is to be maintained at a very high quality – one that allows it to serve as a drinking water supply.

The Middle Branch Reservoir is also classified as a "phosphorus restricted" basin by City DEP and was listed by the NYSDEC on its 1998 list of impaired water bodies pursuant to Section 303(d) of the Federal Clean Water Act. As a result, phosphorus levels in these water bodies *must actually be reduced* to achieve water quality goals. These water bodies have also been the subject of extraordinary and expensive efforts under the 1997 New York City Watershed Memorandum of Agreement to better control phosphorus and other pollutants. Moreover, these reservoirs are the subject of heightened protection criteria for phosphorus that was developed pursuant to the Clean Water Act – known as the "total maximum daily load" ("TMDL") program. The majority of phosphorus pollution entering the Middle Branch Reservoir stems from surface water runoff from existing development and new construction.

The detail of analysis, scope of alternatives, and stringency of mitigation measures presented in the draft EIS should reflect the sensitive location of the Project.[1]

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[1] The position of New York City Watershed Inspector General, a joint appointment of the Governor and the Attorney General within the Attorney General's Office, was established pursuant to the 1997 New York City Watershed Memorandum of Agreement to better protect and preserve the quality of the unfiltered drinking water supplied to some nine million people in New York City, Westchester and Putnam Counties.

I. BACKGROUND CONSIDERATIONS.

A. Gateway Summit Subdivision (Gateway Summit).

This parcel is 96.2 acres in size and zoned as light industrial (I-L). It abuts the Centennial Golf Course to the south and west. It is made up of moderate to steep slopes with some areas of federal and town regulated wetlands. No impacts to the federal or town regulated wetlands are anticipated although a proposed road crossing will encroach upon the wetland buffer area. A wetland permit from the Town of Carmel will be required for the buffer encroachment. The applicant proposes an eight lot commercial subdivision for a mix of commercial and permitted residential use. These uses include: 1) a hotel and conference center, or 145,000 square feet of retail; 2) 98 units of assisted living/senior housing; 3) 140,000 square feet of retail space; 4) 6,000 square feet of office space; 5) 6,400 square feet of restaurant space; and 6) a 68,000 square foot YMCA.

B. Fairways Senior Housing Project (The Fairways).

This 92.9 acre parcel is zoned as low density residential (R120) and located within the boundaries of the existing Centennial Golf Club. New York State Department of Environmental Conservation (DEC) Wetland LC-27 occupies 30.3 acres or approximately a third of the site. No impacts to state or local wetlands are anticipated. The applicant proposes to build a 149 unit senior housing project on 15 acres of the property. Approximately two thirds of the 15 acres, or 9.9 acres, is proposed to be building area or pavement (impervious).

C. Gateway Summit and The Fairways.

These two parcels include over 189 acres of which 150 are existing woodlands. Approximately 23.5 acres of the 150 acres of woodlands is wooded wetland. Approximately 9 acres are open meadow and 1 acre is impervious surface. Approximately 130 acres of the overall parcels will remain "undeveloped" (does this mean undisturbed or without impervious surfaces?) following construction of the proposed Project. (Will the applicant get a conservation easement to protect the rest?)

The proposed Project has the clear potential for significant adverse impacts on water resources. These include: construction related erosion (e.g., siltation from excavation); and significantly increased polluted runoff from additional impervious and less-pervious surfaces (e.g., fertilizers and pesticides from lawns; oil, grease and heavy metals from parking lots and turbidity from increased stormwater flow due to impervious surfaces).

II. ROLE OF SEQRA LEAD AGENCY

The proposal of a large development Project in a highly sensitive environmental area warrants the full use the assessment and protection tools available under the State Environmental Quality Review Act ("SEQRA"). The Town of Carmel, as the SEQRA lead agency for the Project, has the central role in fulfilling SEQRA's environmentally protective purposes. The Town of Carmel can and should retain the necessary scientific and technical experts (at the expense of the Project sponsor) as necessary to assist it in conducting this SEQRA review. The use of independent experts is important to lead agency efforts to effectively scrutinize the work of consultants paid by the Project's sponsor, as well as to assure a full presentation of Project alternatives and mitigation measures.

The lead agency's discretionary responsibilities include: deciding which environmental impacts are potentially significant so as to be assessed in the environmental impact statement; specifying the detail and required factual analysis (and methodology) that will be necessary for each environmental assessment; setting the range of alternatives to be evaluated and specifying the details of alternative development (so as to make the choice among various alternatives a real one); determining the scope and detail of any cumulative and secondary impact analysis; independently approving the draft and final EIS as adequate or rejecting it as deficient; assessing comments on the draft EIS and formulating specific responses to all substantive questions and concerns; identifying necessary measures to avoid or mitigate adverse impacts to the maximum extent practicable; and issuing a findings statement that selects an alternative (from a range of potential alternatives) that minimizes adverse environmental impacts to the maximum extent practicable. The EIS process must be completed prior to any discretionary determination by a governmental entity to fund or authorize a specific project.

III. SPECIFIC COMMENTS

A. Alternatives.

A frequent defect in the draft EIS is a lack of adequate detail in the presentation of lower-build alternatives to the development proposed by the project sponsor. SEQRA allows the lead agency to require the draft EIS to contain sufficiently detailed reduced-build and reduced-impact alternatives so as to *make the choice among alternatives a real one.* The Town of Carmel should carefully identify the alternatives to be developed and specify the level of detail required to adequately address potentially adverse environmental impacts to water quality. The developer's preferred project should not be studied in detail while other alternatives are given only limited review. Any decision to reject a lower build alternative as not being feasible should be explained in detail. It is inappropriate for the Project sponsor to eliminate a lower build alternative simply because it does not fit in with all of its particular goals. Indeed, the lead agency can and should select an alternative that may even be objectionable to the project sponsor when warranted by the EIS. A standard component of the draft EIS, the no-build alternative, must also be thoroughly assessed to give a full sense of the adverse environmental impacts associated with the proposed Project and the development it will induce. All alternatives should be developed to an extent that "apple to apple" comparisons can be made between them by the lead agency. A draft EIS that mostly assesses the proposed Project to the exclusion of other lower build alternatives, such as the one described above, would be unbalanced and unacceptable.

We recommend that the project sponsor be required to develop in detail an alternative that reduces impervious surfaces by 60%, and which keeps all development off slopes that exceed 15%, and which avoid all wetlands and their associated buffers.

B. Stormwater.

This Gateway Summit parcel is the site where a number of large developments are proposed (hotel, senior housing, stores, office space, restaurant space, and a gymnasium). This is also the parcel that contains many areas with steep and moderate slopes (63% is on slopes of 15% or more). A map that clearly delineates the moderate to steep slopes on site must be included in the DEIS. Disturbing areas with steep and moderate slopes often present significant erosion problems. As a result, these areas should not be disturbed. We recommend that the applicant focus on this issue in the DEIS and present alternatives that are designed to eliminate this potential problem.

The largest source of pollution in the Watershed is from "non-point" sources, otherwise

known as polluted runoff. The volume of stormwater that would be generated by the proposed Project will be dependent, in large part, on the amount of impervious surface (*i.e.*, roadways, roof tops, parking lots) present. In other words, the greater the horizontal expanse of the paved development and roof tops, the greater the volume of stormwater that will be generated. Additionally, the volume of stormwater that would be generated by the proposed development is also dependent on the amount and type of vegetation and soils on-site. We recommend that the applicant focus on reducing impervious area by presenting alternatives in the DEIS that are designed to eliminate this potential problem (e.g., stacked parking, multi-story buildings).

The volume and content of runoff (*i.e.*, sediments and contaminants) from the currently vegetated Project site should be fully calculated and described in the draft EIS for comparison to the projected level of runoff for each studied alternative. Real data from other large development projects that have been constructed in this area should be obtained and presented for comparison. Contaminant levels and loads in the runoff (including phosphorus, turbidity, total suspended solids, pesticides, salts, and oils) should be quantitatively presented (*i.e.*, hard numbers with backup calculations and clearly defined assumptions) for each alternative. In addition, the specific design, operation and long-term maintenance procedures for all stormwater collection and treatment should be addressed in detail the draft EIS.

1. DEP and DEC Permit Approvals for Stormwater.

The applicant also needs to comply with both DEP and DEC stormwater permit requirements. Due to the different approaches required by these two agencies to acquire permits, it would be prudent for the applicant to approach both agencies before preparing the DEIS to establish a plan of action that will comply with each.

According to the Preliminary Draft Scoping Outline - Impact Issues (IV), Water Resources (D), Mitigation Measures (3)

"e. Compliance with NYSDEC SPDES General Permit No. GP-93-06"

needs to be changed to:

> Compliance with NYSDEC SPDES General Permit for Stormwater Discharges from Construction Activities Permit No. GP-02-01.

2. Need for a Fully Engineered Stormwater Pollution Prevention Plan.

The applicant should commit at the outset to the development and subsequent implementation of a complete stormwater pollution prevention plan ("SPPP") that, among other things, fully engineers the flow of stormwater through the proposed project. By an engineered plan we mean a specific blueprinted program based on actual site conditions, topography and calculated severe storm event flows that will, when implemented, act to infiltrate, direct, detain, and treat runoff so that contaminants do not reach the reservoir. State-of-the-art methods should be employed throughout, *as many other construction projects in the New York City Watershed have failed sending significant plumes of muddy runoff into reservoirs.*

The applicant should employ the guidance provided by two State publications when developing its SPPP – New York State Stormwater Management Design Manual (October 2001) and New York Guidelines for Urban Erosion and Sediment Control (April 1997) – as well as other heightened design methods available in the scientific literature. We recommend that the applicant retain an expert technical consultant to undertake development of the SPPP. For

example to resolve a similar dispute, the New York State Department of Transportation agreed to retain a nationally respected stormwater consultant to design the SPPP for its project to rebuild a highway segment that traverses the Kensico Reservoir basin.

3. **Methods and Criteria for Limiting Polluted Runoff.**

The exact attributes of the SPPP need to be developed and certified by a professional engineer taking into account site specific conditions. This office, State DEC, and City DEP should be given an opportunity to review and comment upon the SPPP, and reject it as deficient. The following methods and criteria should be incorporated into the stormwater controls during the construction phase as SEQRA mitigation:

(i) Design the SPPP so that violations of state water quality standards are prevented under all conditions; particular attention needs to be given to the narrative water quality standards for turbidity and suspended solids, see 6 NYCRR § 703.2.

(ii) Water flowing from areas up-slope of construction must be fully diverted away or around exposed construction areas to limit erosion.

(iii) Controls for stormwater should be designed, *at a minimum*, for the detention or retention of the 10 year 24 hour storm for the Armonk or Westchester County Airport area during construction and before full re-vegetation. More stringent controls are fully reasonable. These controls should be presented and supported with specific engineering calculations in the SPPP.

(iv) Construction phasing is a highly important attribute of an effective SPPP. No more than three acres of soils that are not completely stabilized (e.g., revegetated, covered with jute matting, etc.) should exist at the site at any one time. All slopes over 8%, all soil piles, and lose fill areas should be covered immediately with a jute or synthetic mat or hydroseeded with a slurry containing a durable tacking agent. Stormwater controls and detention basins must be constructed before other construction excavations, except for those excavations necessary to construct the stormwater controls.

(v) Construction timing should be designed to avoid all excavation or clearing activities from October 1st to May 15th of the year; this avoids the most likely wet weather season and allows sufficient time for the complete re-vegetation of disturbed areas before cold weather. To the extent possible, construction through the most sensitive areas (such as streams, wetlands, and steep slopes) should be limited to portions of the summer that are historically the driest.

(vi) The applicant's construction contract for the Project should not have any fiscal incentives or other monetary benefits with respect to an expedited work schedule. Protection of water quality through deliberate implementation of stormwater controls must be a contractual priority.

(vii) All surface water released from the construction site or from associated stormwater controls must have levels of total phosphorus and turbidity that do not exceed levels in runoff from existing baseline conditions at the undisturbed site. Existing baseline total phosphorus and turbidity levels must be

presented by the applicant in the SPPP.

(viii) The construction site must be assessed and mapped for clay and colloidal soils; construction upon such soils should be avoided if at all feasible and special precautions should be taken to limit the erosion of these soils. Suspended clay soils can pass through many erosion controls and remain suspended in water for over 6 months.

4. Post Construction Stormwater Controls.

Post construction stormwater controls should employ many of the attributes of the SPPP discussed above. However, the SPPP as it relates to the post-construction period should also contain the following:

(i) A detailed site re-vegetation and stabilization plan that will effectively re-establish vegetation.

(ii) Post construction stormwater controls should be designed to handle the 2 year 24 hour storm at a minimum. Engineering design criteria should be employed that assures the survival and routine operation of stormwater management devices after major (i.e., 100 year) storm events.

(iii) All wetlands (state, local, and federal) must be fully assessed and delineated. All wetlands, streams and adjacent buffer areas should be completely avoided.

(iv) The SPPP should identify methods that will be employed to relieve the soil compaction (with associated increased imperviousness) caused by the extensive use of heavy equipment along and upon the construction site. The goal should be to re-establish the soil percolation rates that existed prior to construction. Existing or baseline percolation rates must be presented by the applicant as part of the SPPP.

5. Compliance Assurance, Maintenance and Monitoring.

During all construction within the Watershed, the applicant should be required to employ a qualified professional engineer who will be responsible for assuring full compliance with the SPPP and State water quality standards. This engineer must be provided with immediate "stop work" authority in the event the SPPP is violated or other important deficiencies arise that pose a threat to water quality. We strongly recommend that this engineer, or another on-site inspector employed by the applicant, be a Certified Professional in Erosion and Sediment Control. In conformity with the State DEC General Permit for Stormwater, these individuals must monitor contractor adherence to the SPPP and provide weekly, certified, inspection reports that will identify any deficiencies, violations or stop work occurrences, and discuss corrective actions that were recommended and undertaken. Stormwater controls during construction and before complete revegetation must be thoroughly inspected each week and after each rain in excess of .5 inches.

The applicant should also be required to provide the technical staff of DEC, City DEP and the Attorney General's Office with full site access to conduct inspections and to review the applicant's self-monitoring reports. DEC technical staff must be provided with binding written authority to order the immediate halt of all work should DEC staff determine that a failure to

adequately implement or maintain the SPPP has created a threat to water quality.

C. Fertilizers and Pesticides.

Lawns and landscaped areas generally involve the use of fertilizers and pesticides. Runoff from these areas can transport fertilizers and pesticides into nearby waterways. Fertilizers generally contain large amounts of the problematic nutrient phosphorus which can cause eutrophic conditions (algae blooms, etc.) in the reservoirs. The nearby Middle Branch Reservoir was listed as stressed by phosphorus on DEC's Clean Water Act ("CWA") § 303(d) list and have been the subject of a phosphorus reduction assessment pursuant to the CWA's "total maximum daily load" program. In fact, limiting phosphorus levels in the Watershed is one of the major aspects of the entire Watershed protection program. The draft EIS should carefully assess whether each Project alternative is consistent with DEC's anti-degradation policy. A key focus of the draft EIS should be upon mechanisms to prevent the discharge of any additional phosphorus above natural conditions.

For each alternative evaluated there should be a complete description of a state-of-the-art program to limit the use and application of fertilizers and pesticides. This program should provide details concerning Project staff training and re-training programs. "No spray" areas, including buffer zones for all waterways, should be clearly identified and posted. A program to assure that chemical application is undertaken under appropriate dry weather conditions should also be developed and presented. Beyond the modeling described in the draft scoping outline, real world case studies and a review of relevant literature should be undertaken and presented. The stormwater transport of fertilizers and pesticides should be fully discussed within the context of an overall stormwater control program. The use of organic fertilizers should be fully evaluated as these substances release phosphorus at a far slower rate relative to synthetic fertilizers and operate to build up the soil structure. In addition all pesticide ingredients, including synergists and inerts, that are to be used on the site must be presented and discussed. Our office is particularly interested in "inert," yet often highly problematic, ingredients contained in pesticides.

D. Induced Development and Secondary Impacts.

Induced growth or secondary impacts associated with the Project should be thoroughly evaluated in the draft EIS. A project of this magnitude will undoubtedly increase traffic along local roads. There will be an increase in vehicle trips, impervious surfaces, stormwater flows, construction, and waste water associated with this induced development -- above and beyond those impacts directly associated with the proposed Project. All these impacts must be fully assessed and quantitatively presented for each alternative reviewed in the draft EIS so that a complete picture of the Project's impacts will be revealed.

E. Mitigation.

The lead agency should assure that mitigation measures and best management practices identified in the environmental review process are presented in full detail for public critique. A vague commitment to employ "best management practices" or to develop mitigation in the future should be rejected. The EIS and the SEQRA findings statement should specifically commit to the implementation and maintenance of all identified mitigation measures. More importantly, the Town of Carmel should assure that the mitigation is instituted and maintained in a *legally enforceable* manner. *The Project sponsor should agree that all mitigation measures will be incorporated as enforceable conditions to permits as a predicate to the Project sponsor receiving any SEQRA approval.* By making the detailed mitigation measures an enforceable attribute of

required permits, it is far more likely that the mitigation will actually be undertaken and maintained in the future. Additionally, any supposed "non-development areas" identified in the EIS as a mitigation measure justifying other development should be permanently protected through deed restrictions or through a conservation easement enforceable by a third-party action. A legally binding mechanism must also be developed to assure the continuation of mitigation when, and if, the present Project sponsor sells the property.

Respectfully submitted,

James M. Tierney
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Assistant Attorney General
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Albany, New York 12224
(518) 474-4843

Charles Silver, Ph.D.
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Environmental Conservation Board

TOWN HALL - MAHOPAC, NEW YORK 10541 / (845) 628 - 1500

ROBERT D'ALESSANDRO
Chairman

PEGGY MOORE
Secretary

DAVID KLOTZLE
Wetland Inspector

MEMBERS

EDWARD BARNETT
DAVID CARRUTH
LYNN GREENWOOD
ALISSA PERRONE
BILL PFORZHEIMER
RICHARD FRANZETTI

MEMORANDUM

TO: MR. HAROLD GARY, CHAIRMAN, PLANNING BOARD

FROM: ENVIRONMENTAL CONSERVATION BOARD

DATE: APRIL 28, 2003

SUBJECT: DRAFT SCOPING OUTLINE
GATEWAY SUMMIT – TM 55.-2-23, 24, 25 &
THE FAIRWAYS – TM 44-2-1

OUR BOARD WISHES TO SUBMIT THE FOLLOWING COMMENTS ON THE ABOVE CAPTIONED SCOPING OUTLINE:

THE NYS FRESHWASTER WETLANDS MAP SHOULD SHOW THE ENTIRE SITE AND SHOW THE TOWN WETLANDS.

ON THE MAP OF THE OVERALL PLAN IT REFERS TO AN ESTUARY AREA. WE DO NOT HAVE AN ESTUARY IN THIS AREA.

PAGE 7

ITEM D.1.a

"EXISTING DRAINAGE PATTERNS ON THE SITE AND WITHIN ¼ MILE RADIUS OF THE SITE, AND A DESCRIPTION OF WATERSHED".

COMMENT: THE DRAINAGE ASSESSMENT SHOULD ENCOMPASS THE ENTIRE DOWNSTREAM WATERSHED.

D.1.c.

"STORMWATER RUNOFF QUANTITY".

COMMENT: THEY NEED TO BE SURE THEY ARE MEETING THE PHASE II REGULATIONS.

PAGE 8

ITEM D.3.e

"COMPLIANCE WITH THE NYSDEC SPDES GENERAL PERMIT NO. GP-93-06."

COMMENT: THE GENERAL PERMIT NUMBER IS NOT A VALID REFERENCE ANY MORE. IT HAS BEEN REPLACED BY GP 0201 THAT HAS THE NEW PHASE II REGULATIONS.

PAGE 12

"VI. ADVERSE ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED".

COMMENT: THIS IS JUST AN UNDERLINED HEADLINE. THEY DO NOT TALK ABOUT ANYTHING. CAN THEY EXPAND ON THIS SECTION?

CC: MR. MAGNUS SJOBERG, AICP