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**Exhibit A - Short Environmental Assessment
Supplemental Information (Part 1)**

for
Seneca Iron Works
Agricultural Manufacturing Facility and
Development

Name of Applicant or Sponsor

Earl Martin
Seneca Iron Works – Deer Haven Park, LLC

Architect / Engineer

John Snyder
John Snyder Architects, PLLC

Dave J. Tagg, PE
Dave J. Tagg & Associates PC

Project Location

Located at the Corner of West Romulus Road (County Route 135) and Fayette Road
Romulus, NY 14541
(On Former Seneca Army Depot)



EXHIBIT A - CONTENTS

EXHIBIT A - SHORT ENVIRONMENTAL ASSESSMENT FORM 3

01 PROJECT AND SPONSOR INFORMATION 3

 1A - PROJECT AND SPONSOR APPLICATION: 3

 1B - NAME OF ACTION OR PROJECT: 3

 1C - PROJECT LOCATION: 3

 1D - BRIEF DESCRIPTION OF PROPOSED ACTION: 4

 1E - NAME OF APPLICANT OR SPONSOR: 4

 1F - SENECA ARMY DEPOT SITE AND PRIOR ACTIONS HISTORY: 5

02 DETAILED PROJECT DESCRIPTION 7

03 ZONING 10

04 PROJECT FUNDING 11

05 PROJECT SIZE 11

06 EXISTING LAND USE 11

07 PERMITTED LAND USE 12

08 COMMUNITY CHARACTER 13

09 CRITICAL ENVIRONMENTAL AREAS 13

10 PUBLIC TRANSPORTATION AND VEHICLE TRANSPORTATION 14

11 ENERGY CODE 15

12 WATER 15

13 WASTE WATER 16

14 ARCHEOLOGY 16

15 WETLANDS 16

16 HABITAT TYPES 17

17 ENDANGERED / THREATENED SPECIES 18

18 FLOOD PLAIN 19

19 STORM WATER DISCHARGE 19

20 IMPOUNDMENT 19

21 ACTIVE OR CLOSED SOLID WASTE MANAGEMENT FACILITY 20

22 ONGOING OF COMPLETED HAZARDOUS WASTE REMEDIATION 21

EXHIBIT A - SHORT ENVIRONMENTAL ASSESSMENT FORM

01 PROJECT AND SPONSOR INFORMATION

1A - PROJECT AND SPONSOR APPLICATION:

Seneca Iron Works – Deer Haven Park, LLC

1B - NAME OF ACTION OR PROJECT:

Seneca Iron Works Agricultural Manufacturing Facility and Development, Romulus, NY 14541

1C - PROJECT LOCATION:

Located at the Corner of West Romulus Road (County Route 135) and Fayette Road on the former Seneca Army Depot– Town of Romulus, NY 14541



1D - BRIEF DESCRIPTION OF PROPOSED ACTION:

The Seneca Iron Works ("SIW") project is a proposed agricultural manufacturing project along with other agricultural industrial projects to be completed over time in multiple construction phases.

The project is to be constructed on a site (the "Project Site") in the Town of Romulus, at the former Seneca Army Depot (the "Depot"), on part of tax map parcel number 2-1-01, bounded northerly by W. Romulus Road, and easterly by Fayette Road. SIW (the "Applicant") intends to develop approximately 74.51 acres of the former Depot into modern contemporary agricultural products manufacturing facilities ("Facility").

The Project will be fully compliant with applicable solid waste, air, and other environmental regulations administered by the New York State Department of Environmental Conservation ("NYSDEC") and federal agencies. The Applicant will be submitting necessary applications to NYSDEC and other agencies in order to properly permit this Facility. The Town of Romulus has determined this portion of the Depot is zoned agricultural and we are undertaking a process of securing a zoning special use permit to allow this facility to be constructed on this site. The agricultural manufacturing operations of Seneca Iron Works supports the agricultural industry not only locally in New York State, but also locations in The State of Michigan.

The Applicant has submitted a request to subdivide, per the Town of Romulus Subdivision Regulations, the Project Site from tax map parcel number 2-1-01. A zoning "special use permit" will be needed to permit this facility. The Applicant will be submitting a Special Use Permit Application, with the required Public Notification Form.

The following additional information, consisting of a narrative, exhibits and reports, is being provided to involved agencies to assist them in review of the Project pursuant to State Environmental Quality Review Act ("SEQRA"). This document supplements the information provided in Part 1 and 2 of the Short Environmental Assessment Form.

Where appropriate, the summary provides references to the section of the SEAF that contains the supporting information and/or documentation. The summary is qualified in its entirety by reference to the supporting information and documents, including all materials constituting appendices, and all materials incorporated by reference. This summary is not a complete summary of those materials but is provided in order to facilitate review.

1E - NAME OF APPLICANT OR SPONSOR:

Earl Martin Owner – Seneca Iron Works | Deer Haven Park, LLC
3236 Hoster Road, Seneca Falls NY 13148

Architect / Engineer: John Snyder Architects, PLLC
700 Cascadilla Street, Suite 203, Ithaca, NY 14850

1F - SENECA ARMY DEPOT SITE AND PRIOR ACTIONS HISTORY:

The former Seneca Army Depot occupies approximately 10,587 acres with the Northern portion located in the Town of Varick and the Southern portion of located in the Town of Romulus.

Construction of what is now called the Seneca Ordinance Depot began in 1941. Approximately 500 "igloos" were built, and 20 miles of fencing erected to seal off the property from unauthorized entry. Warehouses, housing, and administration buildings were added and ultimately the 5000 ft. airport runway, acquired from the Air force, was lengthened to 7000 ft.

The peak civilian employment at the Depot in July 1943 amounted to 2511 people from 60 different communities. In Nov. 1946 civilian employment had sunk to 595. Then in 1956, a Special Weapons Project was initiated and established at what would ultimately be called the North Base. At this point, housing at the North Depot Activity became acute with 300 to 400 military personnel to be brought in, so in 1959, 125 Capehart Housing units were constructed. In 1961 the North Base Activity became part of the Seneca Ordinance Depot, and in 1963 the whole Depot was transferred to the U.S. Army Maintenance Command and was renamed the Seneca Army Depot.

The US Army's use of the base included receipt, storage, distribution, maintenance, and demilitarization of conventional ammunition, explosives and special weapons. On July 14, 1989, the United States Environmental Protection Agency ("USEPA") proposed the Depot for inclusion on the National Priorities List ("NPL"). The USEPA recommendation was approved and finalized on August 30, 1990, when the Depot was listed in Group 14 of the Federal Facilities portion of the NPL. Once the Depot was listed on the NPL, the Army, the USEPA, and NYSDEC identified 57 solid waste management units ("SWMUs") where historic data or information suggested, or evidence existed to support, that hazardous materials or hazardous wastes had been handled and may have been released and migrated into the environment. This list of SWMUs was subsequently expanded to include 72 sites. The Depot was a hazardous waste Generator and Treatment, Storage and Disposal Facility and thus, subject to regulation under the Resource Conservation and Recovery Act. Under this permit system, corrective action is required at all SWMUs, as needed. In 1995, the Depot was designated for closure under the Department of Defense Base Realignment and Closure ("BRAC") process. With the Depot's inclusion on the BRAC list, the Army's emphasis expanded from expediting necessary investigations and remedial actions at prioritized sites to include the release of non-affected portions of the Depot to the surrounding community for their reuse for non-military purposes (i.e., industrial, municipal, and residential).

In 1992 the Army announced that the Depot's work force would be further cut and the operation realigned. Seneca Army Depot Reuse Plan was started in 1995 by the Seneca Army Depot Local Redevelopment Authority (LRA), which was created by the Seneca County Board of Supervisors. The primary responsibility assigned to the LRA was the preparation of

a plan for the redevelopment of the Depot. After a seven month long, comprehensive planning process initiated in March 1996 and assisted by outside organizations, a Reuse Plan and Implementation strategy was adopted by the LRA on October 8, 1996.

This "Reuse Plan" was subsequently approved by the Seneca County Board of Supervisors on October 22, 1996 and then by the Romulus Town Board on July 16, 1997. This plan together with amendment #1 dated November 1997 serves as the comprehensive reuse plan for the depot area. It is this latter package, which is to be implemented by the LRAs successor group – the Seneca County Industrial Development Agency. After the review period, the board issued a negative declaration, meaning a full Environmental Impact Study would not be required.

The board following by approving motions adopting the SEQR and negative declaration, and saying the project is compliant with the Public Authorities Accountability Act — after which the final motion was accepted.

The contamination at the Depot is currently being managed by the United State Army Corps of Engineers ("USACE"), and the Depot is listed on the New York State Registry of Inactive Hazardous Waste Disposal Sites (State Superfund List), as a Class 2 Site, Site No. 850006.

Through the BRAC process, the U.S. Army issued a Finding of Suitability to Transfer portions of the Depot to Seneca County Industrial Development Agency ("SCIDA"), which it did in 2005 and 2011. Deer Haven, LLC purchased roughly 7,000 acres of the Depot from the SCIDA on May 2018.

02 DETAILED PROJECT DESCRIPTION

Seneca Iron Works is currently located at 3236 Hoster Road in Seneca Falls, NY. The company manufactures farm and machine implements for the agricultural industry. The current location is not ideally suited for growth of the company thus the company is seeking other more suitable locations in Seneca County. In May 2018, Deer Haven Park LLC, purchased remaining sections of the Seneca Army Depot with plans to locate their new facility on this land. SIW has office locations in Michigan and New York.

The project will contain office areas, fabrication, indoor and exterior material storage and will also include a welding shop and material finishing operations.

The focus of this company is to create a state-of-the-art facility focused on providing a safe and contemporary designed agricultural manufacturing facility. The project will employ design principles such as natural lighting techniques, automated mechanical controls, energy efficient design and will integrate into the natural settings. Rainwater will be harvested for "grey water" use. The location chosen for this project is ideal due to its close proximity to their existing facilities and commitment to employees in Seneca County and Town of Romulus. Mechanical systems will employ scrubbers and cleaner's equipment to reduce air pollutants from the painting and zinc plating processes.

The Applicant intends to develop parcels along West Romulus Road and pave the way for other companies to locate nearby. Please note that The Town of Varick implemented zoning revisions for the area to the North of County Road 135 as Industrial. Although this area in the Town of Romulus is zoned Agricultural we are seeking that the board consider adjacent zoning uses in their analysis. Also, there are current industrial uses on the South side of W. Romulus Road.



The applicant has worked to implement elements of the "Reuse Plan" as approved by Seneca County as follows:

Seneca Iron Works is a substantial employer located between Seneca Falls NY and Ithaca. The company has shown consistent growth in the last 10 years.

- **Involve the private sector in the development of the Seneca Army Depot**
 Seneca Iron Works has invested in purchasing the property from Seneca County and is committed to advancing sensible future private sector development at the Seneca Army Depot.
- **Establish a wildlife conservation area**
 The Deer Haven Visitor Center was opened in 2017. The applicant has consulted with habitat and ecological experts to develop habitat and species conservation plans consistent with state and federal agencies as well as not-for-profit groups concerned with fish and wildlife. These efforts include a comprehensive wildlife management program to protect the white deer. The visitor center is open for the public including guided tours.
- **Ensure effective and efficient cleanup of hazardous waste sites**
 The Applicant intends to employ design principles and reduce waste while protecting the immediate and surrounding environment. The following items are areas that will be addressed in regards to hazardous waste concerns from production.

Air Quality – The primary concern in the operation of the material finishing center building is the hot dip galvanizing operations and the particulate emission (smoke) which escapes from the surface of the molten zinc bath during “dipping”. The emission is caused by the volatilization of flux and is primarily ammonium chloride although zinc oxide is also present (see EPA AP-40). Analysis of the air around the kettle has shown that these fumes do not present a health hazard to personnel, but even though the rate of emission is low (usually 1-3 lbs./hr.), the characteristic light blue haze is a source of complaints.

To resolve this issue pollution control agencies in general have ruled that these fumes must be collected using the best available technology. The Applicant intends to proceed with using the absolute best available technologies to best protect personnel and the environment. This is currently done by using a tightly enclosed fume hood around the molten zinc bath (referred to as the "kettle") and a type of air filter known as a baghouse. This filter is equipped with a powerful suction fan and cloth bags through which the air is filtered, and it may be thought of as a very large vacuum cleaner. Because the particulate is so small, a bag precoat of diatomaceous earth is used. The fume hood also makes significant contribution to personnel safety by containing the splatter of hot zinc that sometimes results when work is dipped.

The combination of fume hood and baghouse will capture virtually all the particulate emission. In the last few years, many new plants, some of which are in sensitive areas are in complete compliance with the applicable permits. We are designing a complete engineered solution address particulate emissions.

Emissions from other tanks such as the “pickling” tanks are not generally a problem since they are mostly water vapor from the heating tanks. However, small quantities of acid are entrained with the vapor and can be damaging to the plant building and equipment. These emissions have not been found to be a health hazard in the quantities present. As protection to the building and equipment fume suppressant chemicals are added to the acid baths. Normally, in warmer areas and/or seasons, the building can be naturally ventilated, and if construction materials are properly chosen, the damage to the building and equipment can be greatly minimized. We will be engineering solutions for ventilation and possibly fume collection.

Liquid Waste - The primary liquid waste is spent pickling acid. Due to its properties it is recommended that hydrochloric acid (HCl) be used for this facility. As the items to be galvanized are pickled, the acid solution becomes saturated with iron from the rust that is dissolved and is no longer useful. The applicant will utilize an innovative "Zero discharge Regeneration System" manufactured by Soprin from Italy.

The environmental advantages of this system are:

- 95% reduction in new HCl needs.
- No Spent liquid disposal.
- No HCl tank trucks will be needed to haul spent liquids.
- Environmentally safe, eliminating all emissions.
- Safe and easy to operate and control.

Solid Waste - Iron Oxide (Ferric and Ferrous) from the neutralization process will be tested by SIW trained laboratory specialists then "delisted". This means that it can be placed in a general-purpose landfill by the contract disposal company. This again will be removed off site and be handled by a facility specifically equipped to delist the sludge before disposal. All process waste water and materials from the manufacturing processes will be removed (by trucks) by a specialized and certified waste handler company such as CleanHarbors.

The Part 1 SHORT ENVIRONMENTAL REVIEW FORM immediately follows in order to assist in the SEQRA review, this narrative section is organized to follow the sections of the SEAF. Each section is reviewed and a brief summary of the Project's potential effect in each area is provided.

03 ZONING

Section 1 of Part 1 asks "Does the proposed action only involve the legislative adoption of a plan, local law, ordinance, administrative rule, or regulation?"

The "Reuse Plan" was approved by the Seneca County Board of Supervisors on October 22, 1996 and then by the Romulus Town Board on July 16, 1997. This plan together with amendment #1 dated November 1997 serves as the comprehensive reuse plan for the depot area. It is this latter package, which is to be implemented by the LRAs successor group – the Seneca County Industrial Development Agency. After the review period, the board issued a negative declaration, meaning a Full Environmental Impact Study would not be required. The proposed land use for the (Facility) is consistent with the proposed land use of the site and neighboring zoning in the Town of Varick. The proposed land use is not consistent with zoning. Being that there is a contradiction between zoning and the accepted reuse plan a resolution is necessary. A permit will be pursued for this reason.

04 PROJECT FUNDING

Section 2 of Part 1 asks "Does the proposed action require a permit, approval or funding from any other governmental Agency?"

This project will be entirely privately funded. No assistance will be obtained from New York State, Seneca County IDA or other sources for the construction of the building.

ANTICIPATED PROJECT APPROVAL SCHEDULE

Government Entity	Anticipated Permit or Approval	Projected Application Date
Romulus Planning Board	Zoning Application	Nov 2018
Romulus ZBA	Consideration of Special Use Permit	Nov - Dec 2018
Seneca County Sewer District #2	Connection to Sewer Plant	Nov 2018
Seneca County Water District #1	Connection to Water Supply	Nov 2018
NYSHPO	State Historic Preservation Office Approval	Feb 2019
USEPA	Title V Clean Air Act Permit	June 2019

05 PROJECT SIZE

Section 3 of Part 1 asks for project size as follows:

a. Total acreage of the site of the proposed action?	74.51 acres
b. Total acreage to be physically disturbed?	Approx. 25 acres
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor?	Approx. 6,500 acres

06 EXISTING LAND USE

Section 4 of Part 1 asks for all "land uses that occur on, adjoining, and near the proposed action"

The site has been significantly altered over the years by The US Army serving as training grounds and munitions storage. This site appears to have been partially cleared during this occupation. Currently the site is being used for agricultural uses. The existing site borders an industrial railyard transfer station to the East and to the North already zoned for industrial in the Town of Varick.



07 PERMITTED LAND USE

- Section 5 of Part 1 asks “Is the proposed action,*
- a. Permitted use under the zoning regulations?*
 - b. Consistent with the adopted comprehensive plan?*

The “Reuse Plan” was approved by the Seneca County Board of Supervisors on October 22, 1996 and then by the Romulus Town Board on July 16, 1997. This plan together with amendment #1 dated November 1997 serves as the comprehensive reuse plan for the depot area. It is this latter package, which is to be implemented by the LRAs successor group – the Seneca County Industrial Development Agency. After the review period, the board issued a negative declaration, meaning a Full Environmental Impact Study would not be required. The proposed land use for the (Facility) is consistent with the proposed land use of the site and neighboring zoning in the Town of Varick. The proposed land use may or may not be deemed consistent with the current agricultural zoning. Being that there is a potential contradiction between zoning and the accepted reuse plan a resolution is necessary. A special use permit will be pursued for this reason.

08 COMMUNITY CHARACTER

Part 6 of Part 1 asks "Is the proposed action consistent with the predominant character of the existing built or natural landscape?"

The Project will introduce a new project typology to the Seneca Army Depot however we shall note that industrial uses have been occurring on the site since the construction of the Seneca Army Depot by the US Army. The site design for this project will employ a sustainable and walkable area around these new building, create a buffer zone along County Road 135 and will be visually and aesthetically designed to integrate into the surroundings.

The design of the building will be a contemporary agricultural manufacturing facility designed with careful attention to the aesthetic design of this facility and how this facility will integrate into the site.

The proposed agricultural manufacturing industrial project will not introduce a different level or kind of activity in this area different from what currently exists. The Town should consider the Western AG lease on portions of the Seneca Army Depot to the West of this project site.

09 CRITICAL ENVIRONMENTAL AREAS

Section 7 of Part 1 asks "Is the site of the proposed action located in, or does it adjoin, a State listed Critical Environmental Area?"

The Project will not be in a CEA and will not result in a significant adverse impact on critical environmental areas.

The NYSDEC designates a Critical Environmental Area based on the exceptional or unique character of the area with respect to one or more of the following:

- a benefit or threat to human health;
- a natural setting (e.g., fish and wildlife habitat, forest and vegetation, open space and areas of important aesthetic or scenic quality);
- agricultural, social, cultural, historic, archaeological, recreational, or educational values;

or

- an inherent ecological, geological or hydrological sensitivity to change that may be adversely affected by any change.

There are no Critical Environmental Areas designated pursuant to 6 NYCRR Part 617 in Seneca County. Thus, the Project will not result in a significant adverse impact on CEAs.

10 PUBLIC TRANSPORTATION AND VEHICLE TRANSPORTATION

Section 8 of Part 1 asks “

- a. Will the proposed action result in a substantial increase in traffic above present levels?*
- b. Are public transportation service(s) available at or near the site of the proposed action?*
- c. Are any pedestrian accommodations or bicycle routes available on or near site of the proposed action?*

Assuming all phases are completed and when the SIW Facility operates at full design capacity, the new Facility will increase employment over current SIW employment levels. The SIW work shift is 6:30 AM to 4:30 PM with incidental office staff staying till close of business at 5PM. Therefore employee traffic occurs outside the “normal” commuter peak hours. Additionally, SIW does encourage employee carpooling and a large population of current employees utilize ride sharing. This will also reduce the amount of traffic to the site.

Public transportation is not provided to this site and no bicycle trails exist currently on the site.

The Project (trucks only and at full build out) is estimated to generate approximately: 3-5 semi-trailer trucks/day; 4-5 small flatbed trailers pulled by a pickup truck; 1 scrap ferrous metal trucks/week. As with any business, incidental small package delivery (UPS or Fed-Ex) does also occur daily.

All intersections are projected to operate at LOS “B” or better on all approaches during both peak hours under existing, background, and full build conditions. There are no significant changes in levels of service as a result of the Project, and no mitigation is warranted or recommended at any of the study area intersections. The town should maintain focus on the fact that this was an active US Army Base where numerous large vehicles operated on roadways leading to this site for many years.

As detailed above, after Phase 2 of the Project has been completed, and assuming the Project traffic would be limited to state highways (coming from the South on Routes 96 or 414, from the North via the New York State Thruway on Routes 96, 96A or 414, or from the East and West on Route 5 (U.S. 20)), these roads are adequate to handle this modest level of truck traffic.

Therefore, based on the above, the Project will not result in a significant adverse impact on Transportation and there will be no traffic impact on the surrounding roadways and community.

11 ENERGY CODE

Section 9 of Part 1 asks: Does the proposed action meet or exceed the state energy code requirements?

The design of the building will be a contemporary manufacturing facility designed to meet all Building and Zoning Codes and requirements including the Energy Code of New York State.

Natural gas will be the greatest energy expense in the plant, and proper furnace design will be used to reduce this expense as much as feasible. A modern furnace is approximately 65% efficient which means that 65% of the heating value in the purchased natural gas does useful work. This is accomplished by the selection of insulating materials that virtually eliminate heat loss from furnace walls, and proper application of burners that convert the gas into heat energy.

Energy for heating the pickle solutions is the other main consumer of the natural gas. The caustic tank heated to 180F to insure removal of oil, and the rinse tanks are operated at 100F to allow the work to be moved into pickle tanks while warm. This improves pickling rate.

The Choice of pickling acid also has an impact on energy cost. Sulfuric acid must be heated to a 140-150F in order to pickle properly, and in a plant of this size amounts to an operating coast of about \$10 per hour per tank if efficient heating means are used. Since these tanks are kept hot all the time this results in a significant cost per year. It is for this reason as well that the use of "unheated" hydrochloric acid (70F or above) for the finishing area.

Electrical energy is a less significant cost, primarily being lighting for the building and energy for cranes, monorail hoists, air compressor, baghouse fan, and incidental office use. A typical sized motor is between 20-30 horsepower.

12 WATER

Will the proposed action connect to an existing public/private water supply?

The SIW facility will utilize approximately 3,000 to 5,000 gallons per day (gpd) on average). In addition to public water system connections this project will utilize "rainwater (grey water) collection systems to reduce supply on the Seneca Falls District #1 Water District. Please also see detailed Part 1 description describing the Liquid Regeneration Unit that will be utilized for this project. The project will utilize large pervious grass areas along with a retention/detention pond to achieve a zero discharge scenario. The pervious grass area will be fed through a slow release piping system that is connected to appropriate oil separation mechanisms.

13 WASTE WATER

Will the proposed action connect to existing wastewater utilities?

The SIW facility will connect to Seneca County Sewer District #2 for all employee toilets, emergency showers, drinking fountains, non-process-oriented sinks. All process waste water and materials from the manufacturing processes will be processed on site utilizing Liquid Regeneration System Unit (described in Part 1).

On site pretreatment and disposal will be managed through on-going SIW protocols and Quality Management System (QPM) protocols.

14 ARCHEOLOGY

Section 12 of Part 1 asks "Does the site contain a structure that is listed on either the State or National Register of Historic Places?"

b. Is the proposed action located in an archeological sensitive area?"

We do not expect this project would result in a significant adverse impact to any Archeological Resources because this site has been significantly altered by the United States Army throughout the years of operation and by Seneca County when the retention area was constructed.

15 WETLANDS

Section 13 of Part 1 asks "a. Does any portion of the site of the proposed action, or lands adjoining the proposed action, contain wetlands or other waterbodies regulated by a federal, State or local agency?"

b. Would the proposed action physically alter, or encroach into, any existing wetland or waterbody?"

The Property does contain a designated wetland that was constructed by Seneca County as a condition of Finger Lakes Airfield improvements in prior years. This wetland does not show up on state EAF mapping however this area, including Reeder Creek will be preserved, maintained and designed to become a site design feature associated with the new facility.

As of June 2018 EAF, mapping there are no other bodies of water regulated by a federal, state, or local agency. While not directly adjacent, there is a wetland amendment designated RO-20 to the North-East of the Project. This results in a wetland check zone that does overlap a small portion of the North-East corner of the Project Site but doesn't pass over the portions of Fayette Rd. or W. Romulus Rd. within the Project. Furthermore, no portion of the project will be developed within the wetland check zone and therefore does not encroach into the nearest wetland or body of water.

The SIW Project will not impact preliminary jurisdictional wetlands.



16 HABITAT TYPES

Section 14 of Part 1 asks to "Identify the typical habitat types that occur on or are likely to be found on the project site."

The habitat type on site is Agricultural/ Grassland. This site contains open fields of grasses, sedges, and wildflowers with little to no shrubs and trees. The character of the open lands is fragmented, and successional field vegetation (much of it non-native or invasive) is growing out of old graveled and paved roadways, parking lots, equipment and material storage areas. In addition, along the old railroad, roadways, and storage areas are simple non-vegetated gravel areas. This gravel substrate is impenetrable to borrowing/tunneling mammals and has resulted in the natural succession of vegetation that is sparsely distributed.