

April 1, 2022

To the Town of York Planning Board:

I am writing as the co-chair of an interested party, the York Trail Town Committee. The committee has significant concerns about the proposed development which we believe will negatively impact the Town's ability to accomplish the long-term goals of trail connectivity identified by the York Comprehensive Plan (p. 28) and the Greigsville Transportation Plan (p. 40), as well as on wildlife in the area.

The project blocks access from the Little Italy Nature Preserve to the Groveland Secondary Trail, making it very difficult to connect these two trails. We have been informed that the developers have reconfigured the paved area to accommodate some car and RV parking at the north end of the tractor-trailer parking lot and have extended a trail around the end of the paved area, but they have not decreased the amount of paving. Nor have they changed the type of parking to drive through, as was suggested by members of the Zoning Board of Appeals.

Changing the painted lines designating types of parking will increase safety hazards. The newly designated car and RV parking is accessible only by driving through truck parking designed so that trucks must be backed into (or out of) parking spaces. This increases safety hazards. It is easy to imagine that a child jumping out of a car or an RV would not be seen by a truck backing up. This is why truck parking is separated from car parking at all NYS Thruway stops. In addition, a change in the painted lines designating parking is impermanent and the paved area could easily revert to truck parking.

The SEQR report states that deer and rabbits are the predominant wildlife species that use the site. But wildlife does not recognize or respect property lines, and in fact the SEQR question is about natural resources on **or near** the project site. The project's proximity to Little Italy Nature Preserve means that wildlife in the Preserve, which is far more diverse than rabbits and deer, may be negatively impacted by the project. In terms of birds alone, more than 50 species have been sighted in Little Italy, including Red-tailed Hawk, Screech-Owl, Great-Horned Owl, Pileated Woodpecker, and Yellow- and Black-billed Cuckoo. Not only will raptors that currently forage in the grassland lose that source of food when it is paved, other species are likely find the habitat of the Nature Preserve less hospitable.

The members of the Trail Town committee ask that in issuing a special use permit for this project, the Planning Board require changes in both the **area** devoted to trucks and the **type** of truck parking to promote trail connectivity and ensure the safety of people using the trails. If this is done, the trail users will bring business to the travel plaza as well as to other businesses in York.

We are also concerned by several inaccuracies in the SEQR submission. Many of these seem minor, but they should be explained and corrected so that the report is a true representation of the environmental impact of the project.

Page 4, section D.1. h. *iv* states that they will create a storm water management pond of approximately 1 acre by means of excavation, yet section D.2. *a* states that the. Proposed action does not include any excavation. This section does not apply to excavation where all excavated materials will remain on site, but it is difficult to believe that the excavation for a 1-acre pond will not have to be removed from the site.

Section D.2. b. states that the project will not result in the alteration of any existing waterbody, yet the plan is for any overflow from the stormwater management pond to go into Bidwells Creek. And, on page 6, section D.2. e. *iii* states that stormwater runoff will not flow to adjacent properties, yet the project descriptions include discharging stormwater runoff to Bidwells Creek.

Also on page 6, section D.2. f. states there will be no sources of air emissions, including fuel combustion. Among the potential sources of air emissions listed is mobile sources during construction, such as heavy equipment. It is difficult to believe that in the construction of a 6,500 square foot building, paving acres of land, and excavating a 1-acre stormwater pond will not generate air emissions. It may be that the amount of air emissions generated during construction, or by idling cars at the drive through and idling trucks waiting to turn into the property and in the parking lots, will not rise to the level of requiring a NY State Air Registration or other permit, but it is not reasonable to state there will not be any significant increase in air emissions created by this project. It is also important to remember that the project is just across the street from a school that does not have air conditioning.

On page 8, section D.2. r states that the project will not require the management or disposal of solid waste, yet in r. *i*, acknowledges that construction will generate 2 tons of solid waste, but leaves the unit of time blank, and operation will generate 2 tons of solid waste, again with the unit of time blank.

On page 9, section E.1. *a.*, the application does not list Rural (non-farm) or Aquatic as existing land uses occurring adjoining and near the project site, yet the Little Italy Nature Preserve, with Bidwells Creek running through it, is rural non-farm use and aquatic use.

On page 10, section E.1. d. *i.*, they state that the York Central School is located withing 1500 feet of the project. While not false, this is a misleading statement, as the school is within 500 feet of the project. Similarly, section E.1. h. *iii*. States that the project is not within 2000 feet of a site in the NYSDEC Environmental Site Remediation Database, even though it is within a few hundred feet of the existing gas station that is in need of environmental remediation.

Thank you for considering this input.

Becky Lewis
Co-chair, York Trail Town Committee