

6 UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

Certain environmental impacts of the proposed Project cannot be completely mitigated. The impacts that cannot be avoided will be reduced to the greatest extent possible through the proposed engineering design, specific mitigative measures summarized in Section 8 of this DGEIS, and the use of good management practices in the operation of the Landfill Expansion. The unavoidable environmental impacts associated with the construction and operation of the Project, include: the loss of 71 acres of wetlands, changes associated with topography and potential for visibility; an increased duration of project-related vehicular traffic; an increased duration for potential noise, odor and dust impacts, as well as an increased volume and duration of leachate and LFG production.

As discussed in Section 5, no practicable alternative was identified which would result in less wetland taking. While this loss of this area of wetlands can be considered significant, these wetlands consist primarily of areas that have been previously disturbed, and represent the least ecologically significant wetlands on the SMI Property within the M-2 zone, as discussed in Section 3.6.3.

In addition, the proposed Wetland Mitigation Project, discussed in more detail in Section 8 of this DGEIS, will create/restore/enhance approximately 585 acres to compensate for this wetland taking.

The preferred alternative for the realignment of Black Brook will also result in the temporary disturbance of approximately 19 acres of wetlands during construction. As noted previously, in upstream areas west of Route 414, the proposed channel will be located at the interface between upland and wetland, where possible, so that disturbance to wetlands during construction can be minimized.

In addition to the 585 acre mitigation noted above, another 350 acres of wetland enhancement within a zone required for floodwater conveyance along the Black Brook corridor on the SMI property is proposed. The wetland enhancement aspects of this alternative are addressed in greater detail in Appendix C of the Black Brook Design Report.

The relocation of the petroleum and natural gas pipelines required in connection with the project will result also in the temporary disturbance during construction of between of between 1.2 acres to 4.6 acres, depending on the alternative route which is ultimately selected. In each of these cases, the temporarily impacted wetlands will either be restored

to their existing condition or enhanced, depending on the location and quality of the wetland area.

The construction and operation of the proposed Landfill Expansion will create a change in the existing topography and drainage patterns of the area by the removal of soil through excavation for base preparation and daily operations. Excavated soils from each staged base preparation area in the lateral expansion will be stockpiled and then reincorporated back into the landfill as construction materials throughout the duration of the project.

As presented previously in Section 4.6.8 of this DGEIS, visual impacts of the proposed Landfill Expansion will occur. In order to minimize potential visual impacts to the maximum practical extent, the Landfill Expansion will incorporate a variety of mitigation measures, including:

- Maintain the lowest elevation of operations for as long as possible;
- Construct progressive lift berms to screen filling operations;
- Construct permanent planted berms along sensitive perimeter areas;
- Preserve existing on-site vegetation; and
- Revegetation of landfill area and the use of neutral colored gas collection equipment.

These measures are described in more detail in Section 8 of this DGEIS.

Visual impacts resulting from the Landfill Expansion will not be significant since all receptors have some degree of visual exposure to the currently permitted landfill operation, either at present or at some point prior to its reaching the permitted elevation. Consequently, the operational and long-term impacts of the proposed Landfill Expansion are consistent with the visual impacts which are currently experienced, or will be experienced upon closure of the Existing Landfill and the Southeast Landfill. Although such effects will increase with height, the effect of the proposed expansion on the studied receptors is a change in the length or degree of exposure rather than a new impact.

During the life of the Landfill Expansion, wetlands and other ecological resources identified in Section 4.5.1 of this DGEIS, will be replaced by the Landfill Expansion operations. While the combined total acreage to be utilized is substantial, the non-wetland areas and ecological community types that will be affected are considered to be very common in the local area and their loss, although unavoidable, is not significantly adverse.

Future land uses will be compatible with the character of the surrounding area and the Town of Seneca Falls and Seneca County development goals, and will, in fact, provide additional economic opportunities. Changes in subsurface characteristics caused by the landfill will effectively preclude any intense development of the site, however, until the filled area has been stabilized, leachate and gas production are reduced, and subsidence occurs.

The traffic patterns on the roadways in the vicinity of the Project are not expected to significantly change as a result of construction and operation of the Landfill Expansion as proposed. The Landfill Expansion will not cause any significant change in traffic service levels at the intersections of Saleman Road with State Route 414, as described in Section 4.6.3 of this DGEIS. However, the duration of the current traffic impact by landfill operations will be lengthened, as the length of time the landfill operates is increased by approximately 14 years.

Engineering measures will be incorporated into the landfill design and operation to mitigate the impact of noise, odor, and dust originating from landfill construction and operation. However, it is not possible to mitigate these impacts completely, and some unavoidable impact will likely result. Due to the site's configuration, location and operational controls, any impact to off-site receptors is expected to be limited. While some odor impacts may occasionally be detected, all reasonable measures will be employed to control LFG emissions and to minimize any off-site impact, as detailed in Sections 2.4.6.10.7 and 8.1.

The Landfill Expansion is expected to conform to the noise standards set forth in the Part 360 regulations, although some supplemental mitigations may be required.

Landfilling at the proposed expansion areas will also increase the volume and duration of leachate and LFG production. Because the duration of the operation of the SMI Landfill will be extended, the associated generation of LFG and leachate will be occurring for a longer period of time. These increases are being mitigated through the utilization of the expanded leachate and LFG management systems described in detail in Sections 2.4.6.5 and 2.4.6.6 of this DGEIS, respectively.