

**TOWN OF PLATTSBURGH
PLANNING BOARD MEETING
JULY 21, 2026**

Resolution No. 26-43

Motion by: Joseph Krupka

State Environmental Quality Review Act Resolution Adopting a SEQRA Findings Statement

WHEREAS, UMS Property, LLC (the “Applicant”) submitted an application to the Town of Plattsburgh (“Town”) Planning Board (“Planning Board”) seeking approval for: UMS PROPERTIES DISTRIBUTION CENTER SITE PLAN 2024 – a request to construct a 774,750 sq. ft. warehouse and distribution facility with an office area and related site improvements, located on Salmon River Rd and Route 22, Tax Map Parcels 245.-4-16.2, 22.11, 40.1, & 41 (the “Proposed Action”); and

WHEREAS, by resolution adopted August 6, 2024, the Planning Board, having previously classified the Proposed Action as a Type I action under the State Environmental Quality Review Act (“SEQRA”) and declared itself Lead Agency, determined that the Proposed Action may have a significant adverse impact on the environment and issued a Positive Declaration, and thereafter conducted a public scoping session; and

WHEREAS, on September 17, 2024, the Planning Board adopted a Final Scope and directed the Applicant to prepare a Draft Environmental Impact Statement (“DEIS”); and

WHEREAS, on April 24, 2025, the Applicant submitted a DEIS evaluating the potential significant adverse environmental impacts of the Proposed Action, and on June 17, 2025, the Planning Board determined the DEIS to be adequate for public review and scheduled a public hearing for July 15, 2025, with written comments to be received through July 29, 2025; and

WHEREAS, the Planning Board held a public hearing on the DEIS on July 15, 2025, and the public comment period closed on July 29, 2025, with the Applicant’s responses to public and agency comments, and the Planning Board’s review period therefor, thereafter extended by mutual consent to November 18, 2025; and

WHEREAS, the Planning Board received and reviewed the Applicant’s responses to comments received during the public comment period, together with a Responsiveness Summary, and on November 24, 2025, accepted the Final Environmental Impact Statement (“FEIS”) as submitted by the Applicant as complete pursuant to 6 N.Y.C.R.R. § 617.9, and directed that copies of the FEIS be provided to all involved agencies and that a notice of completion be published in accordance with 6 N.Y.C.R.R. § 617.9(a)(6) and § 617.12; and

WHEREAS, following acceptance of the FEIS, the Planning and Community Development Office received a letter from the NYSDEC dated December 11, 2025, providing additional comment on the FEIS, including with respect to wetlands and disadvantaged communities (“DAC”); and

WHEREAS, amended 6 N.Y.C.R.R. § 617.19, addressing actions that may impact disadvantaged communities, took effect June 12, 2026, and by its terms applies only to actions for which a positive declaration and DEIS had not been accepted prior to that effective date; the Planning Board having determined the DEIS adequate for public review on June 17, 2025, well in advance of that effective date; and

WHEREAS, notwithstanding that the amended regulation is not required to be applied to the Proposed Action, the Applicant voluntarily provided a supplement to the DEIS containing additional analysis and consideration of environmental factors, including disadvantaged communities, for the Planning Board’s review and consideration; and

WHEREAS, in accordance with 6 N.Y.C.R.R. § 617.11(a), the Planning Board afforded the involved agencies and the public no less than ten (10) calendar days following the filing of the FEIS within which to consider the FEIS before the issuance of a written findings statement, and that period has elapsed; and

WHEREAS, the Planning Board has reviewed and considered the FEIS (incorporating the DEIS by reference), the Responsiveness Summary, the Applicant’s supplemental analysis, and all written and oral comments received during the SEQRA review process, and has prepared a written SEQRA Findings Statement, dated July 21, 2026, a copy of which is attached hereto and made a part hereof, setting forth the facts and conclusions relied upon in the FEIS to support the Planning Board’s determination pursuant to 6 N.Y.C.R.R. § 617.11(b).

NOW, THEREFORE BE IT RESOLVED, that the Planning Board, as SEQRA Lead Agency, hereby adopts and issues the attached SEQRA Findings Statement as its written findings statement pursuant to 6 N.Y.C.R.R. § 617.11(b), and thereby certifies that:

(a) the requirements of 6 N.Y.C.R.R. Part 617 have been met; and

(b) consistent with social, economic, and other essential considerations from among the reasonable alternatives available, the Proposed Action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating, as conditions to this decision, the mitigation measures identified as practicable in the Findings Statement.

IT IS FURTHER RESOLVED, that the Findings Statement shall be filed and circulated to the extent required under 6 N.Y.C.R.R. § 617.12 and made available for public review and inspection on the internet at <https://www.townofplattsburghny.gov/> with paper copies located at the Town of Plattsburgh Town Hall, 151 Banker Road, Plattsburgh, NY 12901.

IT IS FURTHER RESOLVED, that the Planning Board Chairman is hereby authorized to execute the Findings Statement on behalf of the Planning Board.

IT IS FURTHER RESOLVED, that the Planning Board of the Town of Plattsburgh hereby authorizes and directs the Planning Board Chairman, the Town Clerk, and the Town Attorney to take the appropriate steps to effectuate this resolution.

IT IS FURTHER RESOLVED, that this Resolution shall take effect immediately upon adoption.

Seconded By: James Sherman

Discussion (Not Verbatim): Town Senior Planner, Trevor Cole provided a brief project summary and overview of the environmental review process to date. He asked the Board if they had read the findings statement, understood it, and if they had any questions. The Planning Board Members verbally affirmed that they had reviewed the documents. Planning Board member James Sherman asked about the noise mitigation and how those and other mitigations would be tracked or enforced. Mr. Cole responded that the findings statement and the mitigations identified therein would be used as guidance during the detailed preliminary plan review. He explained that the proposed mitigations could be established as conditions of approval and tracked during construction and through the as-built plan process.

Roll Call:

	<u>Yes</u>	<u>No</u>
Terry Senecal, Acting Chairman	X	
Debbie Blake	X	
James Sherman	X	
Sarah Cayea	Excused	
Joseph Krupka	X	
Tim Palmer, Chairman	Absent	

Carried: 4-0

Robin Burgess Dep
7/23/26



STATE ENVIRONMENTAL QUALITY REVIEW Town of Plattsburgh Planning Board

Lead Agency SEQRA Findings Statement

Lead Agency: Town of Plattsburgh Planning Board

Name of Action: UMS Property, LLC New Distribution Facility Site Plan 2024

Location: West side of NYS Route 22, between Irish Settlement Road and Salmon River Road, Plattsburgh NY

Project Sponsor: UMS Property, LLC, 194 Pleasant Ridge Road, Plattsburgh, New York 12901

FEIS Complete: June 16, 2026

Lead Agency Contact Person:

Trevor Cole, AICP, Senior Planner,
Planning & Community Development Department
THE PLANNING BOARD
151 Banker Road
Plattsburgh, New York 12901

Adopted July 21, 2026

Pursuant to the *State Environmental Quality Review Act* ("SEQRA"), codified at Article 8 of the New York *Environmental Conservation Law* ("ECL"), and its implementing regulations, promulgated at Part 617 of Title 6 of the *New York Codes, Rules and Regulations* ("N.Y.C.R.R."), which collectively contain the requirements for the *State Environmental Quality Review* ("SEQR") process, the Town of Plattsburgh Planning Board ("Planning Board"), as lead agency, makes the following findings for the:

UMS Property, LLC New Distribution Facility Site Plan 2024

Description of Proposed Action and Proposed Project

As stated above, UMS is proposing to construct a new warehouse and distribution facility on the west side of NYS Route 22. The Site will be accessed from a new commercial driveway off NYS Route 22. The facility will operate 24 hours per day, 7 days a week with three work shifts. Most of the work at the facility will occur during the morning and afternoon shifts, with approximately 100 employees, with a smaller operational crew of approximately 22 employees for the evening or third shift. The Site has been designed with approximately 200 vehicle spaces to account for the maximum number of employees per shift with adequate reserve volume for shift overlap. Deliveries and outbound shipments from the facility will primarily occur during normal business hours of 7 AM to 5 PM, Monday through Friday. It is estimated that there will be approximately 100 trucks per day entering and exiting the Site with a peak hour rate of 10 trucks per hour. The proposed warehouse building is approximately 774,750 sq ft, including approximately 34,600 sq ft of office area. The majority of the proposed building and office area is split in two sections of 46 ft and 75 ft in height, with a small portion of the warehouse approximately 100 ft in height. This high bay area will house a fully automated racking system that allows for material to be stored up to 90 ft in height, reducing the overall footprint of the building and allowing for more efficient material handling. The Proposed Action will include construction of approximately 30.81 acres of road, building, and other paved or impervious surfaces, along with approximately 15.55 acres of open lawn areas. A water tower and 1,455 sq ft pump house will be also constructed on-site.

Description of Project Location

As detailed in the *Final Scoping Document* adopted on September 17, 2024, The Site is located on the west side of NYS Route 22 between Salmon River Road and Irish Settlement Road on tax parcels 245.-4-40.1, 245.-4-16.2, 245.-4-41, and portions of 245.-4-22.11 in the Town of Plattsburgh, Clinton County, New York. UMS has entered into a purchase agreement to buy the Site for the Proposed Action. The Site is geographically situated approximately one (1) mile southwest of the Plattsburgh International Airport and is bordered on the east by railroad tracks and NYS Route 22. Residential and commercial lots exist to the north and south, and the Site is bordered on the west by mostly wooded lands. The lands are currently vacant and are zoned Industrial. UMS is proposing to construct a new warehouse and distribution facility on the west side of NYS Route 22. The Site will be accessed from a new commercial driveway off NYS Route 22. The facility will operate 24 hours per day, 7 days a week with three work shifts. Most of the work at the facility will occur during the morning and afternoon shifts, with approximately 100 employees, with a smaller operational crew of approximately 22 employees for the evening or third shift. The Site has been designed with approximately 200 vehicle spaces to account for the maximum number of employees per shift with adequate reserve volume for shift overlap. Deliveries and outbound shipments from the facility will primarily occur during normal business hours of 7 AM to 5 PM, Monday through Friday. It is estimated that there will be approximately 100 trucks per day entering and exiting the Site with a peak hour rate of 10 trucks per hour. The proposed warehouse building is approximately 774,750 sq ft, including approximately 34,600 sq ft of office area. The majority of the proposed building and office area is split in two sections of 46 ft and 75 ft in height, with a small portion of the warehouse approximately 100 ft in height. This high bay area will house a fully automated racking system that allows for material to be stored up to 90 ft in height, reducing the overall footprint of the building and allowing for more efficient material handling. The Proposed Action will include construction of approximately 30.81

acres of road, building, and other paved or impervious surfaces, along with approximately 15.55 acres of open lawn areas. A water tower and 1,455 sq ft pump house will be also constructed on-site.

Purpose and Need / Benefits of the Proposed Project

The Proposed Action is intended to support UMS' nearby existing manufacturing facility. The new warehouse and distribution center will allow UMS to consolidate storage and distribution space for their manufactured goods, and to expand storage and distribution capacity to accommodate projected future growth.

SEQRA Review Process

The Planning Board issued a Lead Agency Request and *Full Environmental Assessment Form – Part 1* to the Involved Agencies and Interested Parties on June 21, 2024. No objections to the Planning Boards seeking of lead agency status were received during the 30-day time-period to establish lead agency required under the SEQRA regulations.

On August 6, 2024, The Planning Board declared itself Lead Agency and issued a Positive Declaration, signaling its intention to have prepared, a Draft Environmental Impact Statement ("DEIS"); The Planning Board conducted a public scoping session and accepted a Draft Scoping Document.

On August 9, 2024, the Planning Board issued a public notice and posting in the Press Republican newspaper to provide an opportunity for involved agencies, interested agencies, and the public to review and comment on the scope of work for the DEIS.

A public comment period extended from August 6, 2024 to September 17, 2024 and on September 17, 2024, the Planning Board held its Public Meeting to receive comments on the Draft Scoping Document. The public comment period closed on September 17, 2024. UMS Property, LLC issued a Final Scoping Document on September 17, 2024.

On April 24, 2025, the Applicant submitted a DEIS evaluating the potential significant adverse environmental impacts from the Proposed Action in accordance with the Final Scoping Document. The Planning Board determined the DEIS to be adequate for public review on June 17, 2025 and made it available to all involved agencies, interested agencies, and the public to review and comment.

Notice of availability of the DEIS was published on June 24, 2025 on the Town of Plattsburgh Website and Town Clerk Bulletin, and on June 25, 2025 in the Environmental Notice Bulletin. The Notice established a 30-day minimum public comment period in accordance with SEQRA and public comment to be received through July 29, 2025 and announced a Public Hearing concerning the action to be held on July 15, 2025.

The Planning Board held its DEIS Public Hearing on July 15, 2025. The public comment period closed on July 29, 2025. Planning Board received and reviewed the Applicant's responses to comments received during the public comment period, together with a Responsiveness Summary.

The Final Environmental Impact Statement (FEIS) was issued on November 18, 2025. The Planning Board accepted the FEIS as complete on November 24, pursuant to 6 N.Y.C.R.R. § 617.9, and directed that copies of the FEIS be provided to all involved agencies and that a notice of completion be published in accordance with 6 N.Y.C.R.R. § 617.9(a)(6) and § 617.12.

Following acceptance of the FEIS, the Planning and Community Development Office received a letter from the New York State Department of Environmental Conservation (NYSDEC) dated December 11,

2025, providing additional comment on the FEIS, including with respect to wetlands and the June 12, 2026 amendments to SEQRA regulations related to disadvantaged communities (DAC).

The June 2026 SEQRA amendments applied only to actions for which a positive declaration and DEIS had not been accepted prior to that effective date of the amendment. The DEIS for the Proposed Action was accepted on June 17, 2025, and therefore not subject to the SEQRA amendments.

Notwithstanding that the additional requirements set forth in the amended regulation did not apply to the Proposed Action, the Applicant voluntarily provided a supplement to the DEIS and FEIS containing additional analysis and consideration of impacts to disadvantaged communities and other environmental factors for the Planning Board's review and consideration.

The Planning Board reviewed and considered Applicant's additional supplements, and on June 16, 2026, accepted the supplemented FEIS as complete.

This SEQR Findings Statement is dated and issued on July 21, 2026 following the minimum 10-day post-FEIS period required under the SEQRA regulations.

The issuance of the Findings Statement signals the completion of the SEQRA environmental review process for the Proposed Project.

All Planning Board SEQRA documents for the Proposed Project are available on the Town of Plattsburgh's website at www.townofplattsburghny.gov. Hard copies of all documents are available for public review at the Town Hall located at 151 Banker Road, Plattsburgh, New York.

Facts and Conclusions in the FEIS Relied Upon to Support the Findings

As *SEQRA* Lead Agency, the Planning Board must consider in its *SEQRA* Findings Statement the relevant environmental impacts, facts and conclusions disclosed in the *FEIS* (incorporating the *DEIS* and its attachments by reference); weigh and balance relevant environmental impacts with social, economic and other considerations; provide a rationale for the agency's decision; certify that the requirements of the *SEQRA* regulations (6 *N.Y.C.R.R.* Part 617) have been met; and certify that consistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigative measures that were identified as practicable. In developing this *SEQRA* Findings Statement, the Planning Board has reviewed and considered the *FEIS* (which incorporates the *DEIS*) together with its appendices.

Summary of Potential Impacts of the Proposed Project

In accordance with the *SEQRA* regulations (6 *N.Y.C.R.R.* Part 617.8, *Scoping*), during the scoping process, the Planning Board focused the scope of the *DEIS* on potentially significant adverse impacts and eliminated consideration of those impacts that are irrelevant or not significant.

The Planning Board determined that there is the potential for adverse environmental impacts relative to the following, and these were addressed further in the *DEIS* and *FEIS* as discussed herein:

1. Geology, Soils and Topography
2. Stormwater Management
3. Terrestrial and Aquatic Ecology and Habitat
4. Surface Waters and Wetlands
5. Noise
6. Visual Resources
7. Transportation and Traffic
8. Air Quality
9. Historic and Cultural Resources
10. Solid Waste and Hazardous Materials
11. Utilities and Infrastructure
12. Environmental Justice and Disadvantaged Communities
13. Cumulative Impacts
14. Unavoidable Adverse Impacts
15. Growth Inducing Impacts
16. Summary of Mitigation Measures
17. Proposed Alternatives to the Proposed Action

FINDINGS AND CONCLUSIONS SUPPORTING THE DECISION

1. Geology, Soils and Topography

Impacts: The principal potential impact on geology and soils as a result of the Proposed Action is the potential for erosion of surficial (unconsolidated) materials during construction. This may occur where existing vegetation and their associated root systems are removed. Additionally, changes in site drainage as a result of grading can impact surface runoff, which will be prevented through the implementation of stormwater management and erosion controls as identified in the Stormwater Management Report (Appendix G). Dry conditions combined with machinery and truck movement and wind have the potential to cause airborne migration of soil generated particulate matter and reduced productivity in prime farmland soils.

Mitigations: Minimization of actively disturbed soils and wetting of exposed soil areas when appropriate is recommended to control erosion. Water-borne erosion will be controlled through the implementation of stormwater management controls discussed in Section 4.3. The Proposed Action includes the disturbance of prime farmland soils and farmland soils of statewide importance. However, the Site is not currently used for agricultural purposes and is zoned for industrial activity. To the extent practicable, disturbed soils will be retained on-site through regrading, erosion control, and restoration and re-stabilization activities.

The following best management practices (BMPs) are part of the project design and will be utilized to minimize erosion of the surficial deposits and soils on-site: Only enough area to accommodate the construction needs of the facility will be disturbed; Erosion and sediment controls will be installed in accordance with the Stormwater Management Report (Appendix G) prior to construction to prevent soil erosion; Compacted soils will be restored back to its original conditions using soil restoration techniques; All activities will conform to the requirements set forth by the Town of Plattsburgh; and Vegetation will also be re-established during and following construction. As such, no additional mitigation is required.

Findings: The Proposed Action will involve limited grading activities on a relatively flat site and does not include significant changes in topography. As depth to bedrock at the Site is greater than 20 ft, there are no anticipated impacts to bedrock geology associated with the Proposed Action. As the Proposed Action will conserve disturbed soils within an industrial zoned site, it will not significantly alter the site topography and will not impact bedrock geology.

Therefore, it is the opinion of the Planning Board that the Proposed Action will not result in potentially significant adverse impacts to geology, soils, or topography. There are no potentially significant impacts to geology, soils or topography associated with the Proposed Action, and therefore no further mitigation is warranted.

2. Stormwater Management

Impacts: The Proposed Action has the potential to temporarily increase sediment mobilization by stormwater.

Mitigations: The Proposed Project would comply with applicable stormwater regulations, including the requirements of NYSDEC and the *Town of Plattsburgh Zoning Ordinance*. Additionally, potential impacts will be minimized with the implementation of appropriate environmental plans and management practices. Specifically, the Stormwater Management Plan has been developed to minimize sediment and other pollutants in stormwater discharges. Appropriate stormwater management, including the best management practice of good housekeeping, will be implemented to ensure the integrity of stormwater discharges and mitigate any potential impacts to the ecological conditions of nearby properties.

The project will also require a CWA 404 Individual Permit Application from USACE and a Section 401 Water Quality Certification from NYSDEC. A copy of the Joint Permit Application is provided in the FEIS. As a result of the new freshwater regulations taken effect on January 1, 2025, a Jurisdictional Determination (JD) from NYSDEC will be applied for in accordance with 6 NYCRR Part 664, and if appropriate, NYSDEC Freshwater Wetland Permit application will be added to the Joint Permit Application.

Findings: It is the opinion of the Planning Board that adherence to the Stormwater Management Plan and NYSDEC and ACOE regulations will prevent negative environmental impacts associated with stormwater as a result of this project.

3. Terrestrial and Aquatic Ecology and Habitat

Impacts: The NYSDEC EAF Mapper Summary Report did not identify any state-listed threatened or endangered species on-site. However, as there is potential for modification of existing habitat types as well as temporary and permanent displacement of the existing common wildlife, some minor adverse impacts to ecological resources may occur as a result of the project. A November 20, 2024, letter from New York Natural Heritage Program (NYNHP), identified the Eastern Pearlshell freshwater mussel (*Margaritifera margaritifera*), a species of special concern in the Salmon River and Houghton's Sedge (*Carex houghtoniana*), a state-listed, threatened plant species as occurring within 1/3 mile of the Site. The letter did not identify any other species, including bats. No state or federally listed plants or animal species were observed during site investigations in 2022 and 2024. The NYSDEC Environmental Resource Mapper indicates there is a significant natural community, Pitch Pine-Heath Barrens located approximately one half mile north of the Site and one mile east of the Site. Site construction activity will occur away from and does not include disturbance to the Pitch Pine-Heath Barrens. Accordingly, in their November 20, 2024, response letter, the NYNHP did not include this rare community type as occurring in the vicinity of the Site.

Information provided by the USFWS IPaC system identified the potential for the state and federally listed Northern Long-eared bat (NLEB) and the Indiana bat, B. Laing determined that in their professional opinion the "proposed development of the subject site, as reviewed by this office, will not significantly impact any endangered or threatened species and no further review of this topic should be necessary." This was determined based on the lack of NYSDEC records of known occurrences of either species within the vicinity of the Site, lack of NLEB occurrences in the Town of Plattsburgh or known Indiana bat hibernacula in Clinton County, and lack of observed evidence of the occurrence of these species during B. Laing's site investigation.

Construction activities associated with the Proposed Action will temporarily disturb the existing soil profile during clearing and grading activities. However, these soils will be used onsite for grading and will ensure the Site is developed in such a manner to prevent stormwater runoff and to re-establish vegetation, where applicable.

The Proposed Action will result in the temporary and permanent removal of common vegetation and habitat. As there are no known occurrences of rare, threatened, or endangered species on-site, it is not anticipated that any of these species will be affected. However, as there is potential for modification of existing habitat types as well as temporary and permanent displacement of the existing common wildlife, some minor adverse impacts to ecological resources may occur as a result of the project.

The Proposed Action will also result in the filling of approximately 9.4 acres of freshwater wetlands.

Mitigations: Although the wetlands to be filled mostly exist within the south/western fields and were the result of human activity and are currently subject to invasive species, the Proposed Action will include

compensatory wetland mitigation elsewhere on the subject property. This will be achieved through methods acceptable to USACE and/or NYSDEC for issuance of Freshwater Wetlands Permits, and will result in greater wetland acreage at higher-quality wetland habitats than what currently exists at the Site.

Potential impacts resulting from modification of existing habitat types and displacement of the existing common wildlife will be minimized with the implementation of applicable environmental plans and management practices such as limiting the amount of area stripped of vegetation at any one time to the area needed to accommodate the facility. Appropriate stormwater management, including the best management practice of good housekeeping, will be implemented to ensure the integrity of stormwater discharges and mitigate any potential impacts to the ecological conditions of nearby properties.

Findings: As wildlife is limited across the Site and no sensitive species are known to occur on-site, no significant adverse impacts to wildlife are anticipated. Additionally, and as is the case with any type of development, potential impacts from general site development (i.e., stripping and clearing of vegetation) include stormwater and erosion, which have the potential to affect nearby properties, if not properly managed and maintained. However, potential impacts will be minimized with the implementation of applicable environmental plans and management practices.

As a result of the distance from the Site to the significant natural community, the existing intervening site conditions such as existing significant infrastructure, road improvements, natural features, and with the mitigation discussed above, there are no anticipated potential impacts to the Pitch Pine-Heath Barrens as a result of the Proposed Action.

4. Surface Waters and Wetlands

Impacts: Under the Proposed Action, 9.4 acres of freshwater wetlands will be filled. As detailed in the Joint Permit Application, most of the wetlands to be filled are a result of previous agricultural activities (ditching having gone fallow) and are inundated with invasive species (e.g., buckthorn). These existing wetlands do not provide significant ecological value, and their reconfiguration and/or removal is not considered a significant ecological impact.

The Proposed Action has the potential to temporarily increase sediment mobilization by stormwater. Potential stormwater impacts are discussed in DEIS Section 4.3 and in the Stormwater Management Plan (Appendix H).

Mitigations: The Proposed Action will require a CWA 404 Individual Permit Application from USACE and a Section 401 Water Quality Certification from NYSDEC. As a result of the new freshwater regulations taken effect on January 1, 2025, a Jurisdictional Determination (JD) from NYSDEC will be applied for in accordance with 6 NYCRR Part 664, and if appropriate, NYSDEC Freshwater Wetland Permit application will be added to the Joint Permit Application.

In response to NYSDEC comments about the applicability of DEC jurisdictional criterion, the subject wetland delineation was updated in July 2024 and validated by the NYSDEC on August 4, 2025. Per the Joint Permit Application, mitigation was originally proposed to be completed under the Ducks Unlimited Wetland in Lieu Fee system. Outlined in a letter from the applicant's environmental consultant B. Laing Associates, dated September 10, 2025, the applicant now intends to mitigate the filling by replacing the wetlands elsewhere on the subject property. While the design and location are not yet finalized, the project plans to offset the loss of 9.4 acres of wetlands north of the project development by developing new wetlands at a comparable or greater acreage. This will be done by connecting areas of wetlands through minor re-grading or diversion of water resources. Upland areas within the old eastern agricultural fields can also be restored to a wetland to offset losses. Seeding and planting of native wetland vegetation will be undertaken to ensure that the restored/created wetlands provide an ecological benefit and not a

repository for invasive plants (e.g., *Phragmites*, *Lythrum salicaria*). In addition, adjacent area restoration may be undertaken to offset the loss of regulated uplands in the north of the site. There are no other potential impacts to surface waters that require mitigation.

Mitigation efforts to address potential stormwater impacts are discussed further in DEIS Section 4.3 and in the Stormwater Management Plan (Appendix H). Any such impacts will be mitigated as described therein.

Findings: The Planning Board finds that although wetlands will be filled, they are not wetlands that host significant or endangered natural communities nor uncommon habitat. Additionally, the replacement of existing wetlands with wetlands of equal or higher quality will mitigate the potential negative environmental impacts. All work will be performed in accordance with the applicable permits and regulatory requirements. As discussed above, there will be an estimated 9.4 acres of delineated wetlands impacted by the Proposed Action. Additionally, the proposed action includes positive hydrologic impacts through ditching and other stormwater management features which will restore previously-removed hydrological connections to ensure the upstream and downstream flows are maintained. This is anticipated to improve conditions for neighboring properties that have expressed concern about runoff from the site due to blocked or filled drainage ditches.

As a result, the Planning Board finds surface water and wetlands impacts have been avoided or minimized to the maximum extent practicable and implantation of the mitigation efforts discussed above will prevent negative environmental impacts associated with this project.

5. Noise

Impacts: The results of the highly conservative model presented in the Noise Impact Assessment indicate a potential to increase sound levels by up to 6 dB(A) at nearby residences to the south of the Site, a potentially significant impact. The NYSDEC guidance policy indicates sound pressure level increases above ambient of up to 5 dB(A) are considered "unnoticed to tolerable." As such, it was determined that mitigation should include an additional 2 dB(A) of sound control to mitigate noise impacts below the level of significance.

Mitigations: Mitigative measures were explored to eliminate potential acoustical impacts to these receptors during nighttime operations. Those mitigation measures include:

- Selecting alternate facility mechanical equipment with lower levels of sound emissions;
- Selecting alternate locations for facility mechanical equipment;
- Installing noise control shrouding/encapsulation on facility mechanical equipment;
- Installing noise control fencing along the south margins of the Site;
- Installing noise control walls/fencing on the facility roof between the facility mechanical equipment and residential receptors;
- Other technological or operational measures that will reduce noise impacts by at least 2 dB(A); and
- Upward-revision of existing ambient sound level conditions based on additional ambient sound observations.

To demonstrate this mitigation approach, additional model scenarios were developed that incorporated a noise barrier wall constructed on the roof around the facility mechanical equipment, and to a height of 2 ft above the mechanical equipment noise source. Under this scenario, the maximum observed increase in nighttime sound level at proximal receptors is reduced to 4 dB(A), a level which does not constitute a potentially significant impact. Although the rooftop wall approach is the mitigation approach represented

in the model, alternate mitigation approaches consistent with the level of noise control represented in this scenario remain viable alternative mitigation options.

Construction related activities have the potential to result in short-term noise impacts during the daytime when construction activity is occurring at the south end of the Site. To mitigate potential impacts, the following BMPs will be employed during the construction phase: At a minimum the following mitigation measure will be incorporated into the various phases of site development to reduce potential noise impacts.

- Construction activities will be limited to daytime hours;
- All construction equipment will be maintained with properly functioning noise reduction muffler systems per manufacturer's specifications as part of construction contracts and contractor responsibilities;
- Earth-moving equipment and dump trucks will be restricted from "tail gate banging" during sensitive times of the day (early morning and late evening) and when operating near residential receptors;
- Building construction near adjacent residential receptors will consider phasing opportunities and scheduling work to reduce potential noise impacts by erecting buildings, berms, stockpiling materials, structure placement, etc. to interrupt sight lines and therefore reduce noise levels being generated in the direction of sensitive receptors as construction advances on-site;
- Haul roads, access drives, materials storage areas, staging areas, etc. will be placed as far from sensitive receptors and internal to central portions of the site to the greatest extent practicable; and
- Noise control equipment shrouding and/or temporary noise control fencing/walls will be installed when necessary to prevent significant off-site noise impacts.

Findings: The Planning Board finds that given the proposed mitigation, short term construction noise will be reduced to the extent practical and is temporary in nature. Long term operational noise will be reduced to an increase of 5dB or less which is considered unnoticeable to tolerable.

6. Visual Resources

Impacts: The Applicant conducted a viewshed analysis within a 2-mile radius. Significant topographic and vegetative screenings protect the project location from view from most directions except the northeast. The viewshed analysis identified five (5) visual sensitive resources (VSRs) as having potential visibility of the Proposed Action. The 5 VSRs identified did not include the historic register eligible Chapel Hill property at 107 Salmon River Road. The SA Technical Memorandum includes a series of photographs collected by SA on October 22, 2024, from three (3) Key Observation Points (KOPs) discussed below. These vantage points are representative of those areas having potential visibility or "Likely Project Visibility"

KOP 1: State Route 22 Bridge (I-87/Adirondack Northway overpass). Existing View: The view from KOP 1 is comprised of an open expanse of roadway and associated line paint and guard rails in the foreground. The roadway is lined with a mix of deciduous vegetation in fall color and at various stages of growth. Human-made elements dominate the view from the foreground road surface, and roadside utility lines and a telecommunications/cell tower in the middle ground. The view is from an elevated position in the overall landscape, looking down the open unobstructed view corridor created by the roadway. The combination of open view and elevated position allows for views above the middle ground vegetation to a silhouetted background ridge. Although dull with little contrast against the sky, the ridge acts as the focal point of the view drawing the attention

of the viewer. **Simulated View:** With the Project in place, portions of the building are minimally visible in the center of the view, above the middle ground vegetation and below the background ridge. From a distance of approximately 3,430 feet the building appears as one large mass, with minimal visual distinction between texture and color. Tree removal associated with clearing of the site is visible without drawing attention. The varying heights and uneven tops of the remaining foreground and background vegetation softens the edges of the building, by breaking the horizontal lines, helping it to blend more with the existing landscape. The additional human-made features with the Project in place, however the focal point of the view remains the background ridge. Viewer expectations in regard to landscape character and land-use are not changed by the addition of the proposed Project, and the resource is not impacted.

KOP 2: State Route 22 (north of Salmon River Road, near #4025), **Existing View:** The view from KOP 2 looks northwest at the Project just south of the proposed entrance. The view consists of a rural/suburban residential property, mown grass yard and multiple human-made elements on the left side of the frame, while the State Route 22 corridor dominates the center foreground. Characteristics include blacktop, line striping, utility infrastructure and a parallel roadside swale and associated scrub vegetation.

Beyond the foreground roadway and manicured lawn, there is a hedgerow of various types and sizes of deciduous and evergreen vegetation. The vegetation adds interest to the view through the contrast in texture and color, creating a focal point drawing attention from the road corridor. An additional building is visible through the roadside vegetation, as viewer looks ahead.

Simulated View: With the Project in place, the middle ground vegetation has been largely removed to allow for the Project building and associated site work and landscaping. The addition of the project adds additional land-use to the view, with the scale of the Project in contrast to the adjacent residential property. At a distance of 740 feet the building features are discernable with various shades of colors and patterns breaking up the façade into sections. The division of the building with texture and color reduces the perceived scale of the building within the landscape. The unbroken horizontal line created by the top of the building attracts attention as a human-made feature within the landscape, where before a natural line interacted with the skyline. Introduction of the Project to the view adds additional features to the landscape character and land-use altering the specific view. The surrounding landscape and scenic integrity of State Route 22 at this KOP are low. This transfers to viewer expectations for this stretch of road which are low therefore, the resource is not impacted.

KOP 3: South Junction Road (I-87/Adirondack Northway overpass), **Existing View:** The view from KOP 3 is similar to KOP 1 and is comprised of multiple road corridors. Foreground scrub vegetation screens the majority of the I-87 road surface as it fights to grow amongst the guardrail and shoulder. Beyond the foreground road surface human-made elements are screened by the roadside vegetation that defines the I-87 corridor. The fall, leaf-off foliage adds texture to the foreground and provides ample roadside screening. The conditions of the day combined with the time of year creates a dull image with now bright colors or unique contrasts to draw a viewer attention. The view does not contain a focal point.

Simulated View: With the Project in place, portions of the building are minimally visible in the center of the view, above the middle ground vegetation. From this distance the building appears as one large mass, with minimal visual distinction between texture and color. There is no visibility of the site work and associated clearing, as the vegetation along the I-87 corridor blocks it. The building itself rises into the sky, yet the remaining foreground and background vegetation helps to soften the edges of the building and allow it to blend more with the existing landscape. Viewer

expectations in regard to landscape character and land-use are not changed by the addition of the proposed Project, and the resource is not impacted.

Mitigation: Through further analysis, SA determined that potential views of the Proposed Action the 5 VSR locations identified do not constitute a significant adverse visual impact due to limited views of the site, limited accessibility of the VSRs, and/or limited duration of views of the Proposed Action due to the VSR being located along a transportation corridor. Therefore, no additional mitigation efforts are required.

Findings: Though the new facility will be visible from certain nearby locations, it does not block, interfere with, or impede the enjoyment of visually sensitive or historic resources by the public. Therefore, the Planning Board finds that the project will not result in an adverse visual impact.

7. Transportation and Traffic

Impacts: The FAA reviewed the Proposed Action in accordance with 49 U.S.C., Section 44718 Title 14 of the Code of Federal Regulations, part 77, and issued a "Determination of No Hazard to Air Navigation" on January 6, 2025. As such, there will be no impacts to aviation as a result of the Proposed Action.

The Applicant provided a Traffic Assessment that was completed in March 2025 for the Proposed Action. The Traffic Assessment specifically evaluated the following intersections to assess impacts from the Proposed Action considering trip generation:

- NY Route 22/I-87 Exit 36 Northbound Off-Ramp;
- NY Route 22/I-87 Exit 36 Southbound On-Ramp;
- NY Route 22/Irish Settlement Road (County Route 32);
- Irish Settlement Road (County Route 32)/Pleasant Ridge Road/Archie Bordeaux Road;
- NY Route 22/I-87 Exit 36 Southbound Off-Ramp;
- NY Route 22/Archie Bordeaux Road/Gas Station Driveway; and
- NY Route 22/Salmon River Road (County Route 33).

The following excerpt from the Traffic Assessment summarizes the findings of the traffic analysis:

- The proposed development will generate 102 new trips during the AM peak hour and 122 new trips during the PM peak hour of which about 8% to 13% will be truck trips.
- The level of service analysis indicates that most of the study area intersections will not experience any significant increase in delay after full build out of the proposed development.
- The eastbound approach of Irish Settlement Road has been and will continue to operate with long delays during the peak hours. This analysis conservatively estimates that the approach will operate at LOS E/F during the peak hours but expects this conditions to be limited to the peak hours.
- Signalizing the intersection will reduce delays but we recommend the intersection be monitored given that most of the employees of the new center will relocated from the existing facility, and unsignalized operations may be adequate for most of the day.
- The project is located on the outside of a curve with clear views (sight lines) looking north and south along Route 22.

As part of the CM Traffic Assessment, a sight distance feasibility evaluation at the proposed driveway was also completed which determined the available sight distances exceed 1,000 ft in each direction.

The traffic assessment was provided to the New York State Department of Transportation (NYSDOT) Region 7 for comment. Technical Comments were issued by e-mail on October 31, 2025 and provided

to the Applicant. Though the NYSDOT raised questions regarding certain data collection methods and analysis, it issued no specific determinations or opinions regarding potential impacts or mitigations. NYSDOT reiterated that an access permit would be required for the new driveway and that the revised plans should be submitted in consideration of said permits.

Mitigation: The project is subject to Site Plan review by the Planning Board, which customarily conditions approvals upon compliance with all other State Agency Jurisdictional permits. In this instance the project will be required to meet the design requirements and obtain approvals and permits from the NYSDOT in order to advance the project to construction.

Findings: It is the conclusion of the Planning Board that the project's compliance with Site Plan review conditions and NYSDOT permit requirements will eliminate significant traffic impacts resulting from the development. As a result, the Planning Board finds that traffic and transportation impacts have been avoided or minimized to the maximum extent practicable and implantation of the mitigation efforts discussed above will prevent negative environmental impacts associated with this project.

8. Air Quality

Impacts: The NYSDEC info Locator Map was reviewed to determine if there are any federally regulated air emission sites within the vicinity of the Site. The closest facilities to the Site that maintain authorizations related to air emissions are more than one mile from the Site. Due to the geographic separation, emissions from these facilities are unlikely to impact ambient air quality in the vicinity of the Site as the permitting process would have required the facilities to demonstrate compliance with the United States Environmental Protection Agency's (USEPA) National Ambient Air Quality Standards (NAAQS) for criteria pollutants, as well as State regulatory air quality standards.

Mitigation: No potentially significant adverse impacts to air quality will result due to construction or operational activities and therefore, no mitigation measures are warranted. However, the Site will implement best management practices (BMPs) to minimize air emissions associated with the Site.

- Heavy trucks and construction equipment will not be allowed to idle during product loading and unloading, or other inactive times;
- Generator operating hours will be monitored to ensure annual operating hours do not exceed 500 hours, in accordance with NYSDEC's exemption requirements;
- Soil disturbance during construction activities will be limited to the amount of area needed, and water and/or approved palliatives will be applied to minimize the potential for fugitive dust generation;
- A stabilized construction exit will reduce sediment from being tracked onto public roads, reducing the potential for air borne particulate emissions; and
- The main storage areas will be minimally conditioned (50°F during the heating season and 85°F during the cooling season), reducing energy demand and associated emissions.

Findings: In response to NYSDEC questions regarding air quality associated with mobile emissions and warehoused product off-gassing, the Applicant produced a Mobile Emissions Addendum dated September 19, 2025 wherein the emissions from mobile pollutant sources were calculated for the project. The analysis concluded Mobile source emissions associated with both the construction and operational phase of the Proposed Action will be significantly below Air Facility registration AFR thresholds. As previously described, AFR thresholds are consistent with levels of emissions with a regulatory predetermination of being protective of human health. Furthermore, mass emission of criteria pollutants from mobile emission sources associated with the Proposed Action will result in significantly less emissions in comparison to existing emission associated with current traffic levels along NY RT-22 and I-87. For these reasons, mobile source emissions related to the Proposed Actions will not cause an

adverse impact to air quality. The applicant also provided calculations for the potential Volatile Organic Compounds (VOC) that could be emitted through off-gassing at the warehouse. Under projected production levels for 2027, up to 4.73 tons of VOCs will be contained within the materials anticipated to be stored at the Distribution Center. This quantity represents an upper limit for the VOC that is present in the materials, of which the emissions associated with storing these materials at the Distribution Center would be a fraction.

Actual VOC emissions from these materials during storage at the Distribution Center are likely significantly less than the total amount contained within the products.

For context, a non-exempt facility at this location emitting up to 25 tons of VOCs would qualify for an Air Facility Registration (AFR) from NYSDEC. AFRs are ministerial actions not subject to SEQRA under a presumption of no potentially significant air quality impacts. Potential emission of VOCs from a product that contains less than 19% of AFR limits in total at an exempt facility does not present a potentially significant adverse impact.

For these reasons, it is the opinion of Planning Board that the project will not result in significant impacts to air quality.

9. Historic & Cultural Resources

Impacts: The Proposed Project was reviewed in conformance with the New York *State Historic Preservation Act of 1980 (SHPA)*. UMS Property, LLC submitted the Proposed Project to OPRHP for review (OPRHP No. 23PR02130). On March 16, 2023, New York State Office of Parks and Historic Preservation (NYS OPRHP) issued a findings letter concluding that no properties, including archeological and/or historic resources, listed in or eligible for the New York State and National Registers of Historic Places will be impacted by the Proposed Action (DEIS Appendix A). No additional sites of local importance or significance were identified during the review process or public engagement.

Mitigation: For these reasons, the Planning Board concludes that no mitigation efforts related to historic & cultural resources are required.

Findings: It is the opinion of the Planning Board that the Proposed Project would have no adverse impact on historical or cultural resources in or eligible for inclusion in the National and State Registers of Historic Places. Accordingly, the Planning Board concludes that there will not be a significant impact on Historic or Cultural resources as a result of this project.

10. Solid Waste and Hazardous Materials

Impacts: The Site consists of vacant land which was historically used for agricultural purposes. There are no existing improvements or infrastructure at the Site to produce solid or hazardous waste. Based on prior desktop research findings (i.e., NYSDEC Full Environmental Assessment Form (EAF) and the Final Scoping Document), there are no material concerns which would warrant the need for remedial action at the site. Although PFAS contamination investigations are ongoing at the former Plattsburgh Airforce Base (PAFB), a state superfund site, there are no known impacts to the Site. Additionally, due to project scope, the Proposed Action will have no impact on ongoing activities at the former PAFB site, which is located more than one mile from the Site, separated by infrastructure, including railroad, state and interstate roads, and multiple structures/buildings as well as the existing, operating portions of the airport itself.

A Solid Waste Summary dated January 22, 2025, was prepared by RMS for the UMS Property LLC, New Warehouse and Distribution Facility to detail the quantities and types of solid wastes to be generated from the proposed building and its operations. According to the summary, the Proposed Action would

generate solid waste from the warehouse and distribution portion of the proposed facility. This would be limited to cardboard, plastic pallet wrapping, and wood pallets, and other packaging materials. The weekly volume for the solid waste is estimated at 45 cubic yards. The solid waste generated from the office portion and the anticipated 200 employees of the proposed facility is estimated at 30 cubic yards per week. This waste will primarily consist of paper products from office use, along with minor food and packaging waste from employee break areas. Recycling bins for all cardboard, and plastics and returnable bottles will also be made available at the break and office areas. All cardboard and wood products produced by the warehouse and distribution center will be fully recycled, while the break areas for the office portion of the project will have recycling bins for all cardboard, plastics, and returnable bottles, as described above. The remaining approximately 75 cubic yards of solid waste produced per week will be disposed of at the Clinton County Landfill, located in the Town of Schuyler Falls, approximately 9.5 miles northwest of the Site, which has the capacity to accept this volume of waste. Waste generated by the Proposed Action will be partially offset by consolidating operations into a single facility which will result in the reduction on waste generation at other currently operational facilities, and the total volume of waste will be managed by local facilities.

Mitigation: The Planning Board concludes the above operational controls are adequate and that no additional mitigation efforts related to solid waste and hazardous material are required.

Findings: The Proposed Action will therefore not result in generation of significant additional amounts of solid waste, and as all wastes will be handled by local facilities with adequate capacity to accept them. No production, vehicle maintenance, or industrial activities will occur at the Site. As such, there would be no hazardous waste generated, or hazardous materials used at the proposed facility, including petroleum bulk storage (PBS) and chemical bulk storage (CBS). Spill prevention and response procedures will be outlined in the facility's Stormwater Management Report, which will be used to minimize the potential for leaks, spills and other releases (i.e., petroleum from heavy equipment) from entering any body of water during construction. Good housekeeping and preventative maintenance practices during construction will also help prevent spills before they occur.

As such, it is the opinion of the Planning Board that the Proposed Action will not result in potentially significant adverse impacts with regard to solid waste or hazardous materials.

11. Utilities and Infrastructure

Energy- The March 2025 Mechanical Basis of Design (BOD) report, developed by DuBois & King, Inc. for the Proposed Action discusses several options for the proposed mechanical system and the energy demands of the system. Per correspondence with UMS personnel, the facility will utilize the Geothermal Heat Pump HVAC System Option (Geothermal Option) presented in the BOD report. The Geothermal Option optimizes energy efficiency and prioritizes renewable through the use of geothermal heat pumps and limiting natural gas demand and usage. The Geothermal Option includes installation of the following equipment:

- 32 50-ton external (rooftop) HVAC units (RTUs)
- 10 10-ton external (rooftop) HVAC units (RTUs)
- 9 internally-located heat pump units
- 2 supplemental natural gas fired boilers

Service connection requirements for the Geothermal Option include 16,000 CFH of natural gas capacity, 11,829 kW of electrical connected load (including other connected building loads in addition to building conditioning loads), and 8,028 kW of electrical demand. Annual energy consumption associated with the Geothermal Option is 13,490,093 kWh. As the natural gas fired boilers are

included for supplemental and emergency use only, annual natural gas consumption has not been calculated. The annual energy consumption estimates were determined based on local weather data, peak heating and cooling demands, assumed equipment operating hours, and minimum equipment performance/efficiencies. The Site will be served by New York Electric & Gas (NYSEG). As part of the Action, a three-phase electrical service and natural gas utility service piping of appropriate capacity and reliability is proposed. To accomplish this, two (2) new transformers will be installed on-site.

The service available to the Site does not currently have the capacity to meet the electrical demand for the proposed facility. However, UMS is currently coordinating with NYSEG and the New York Power Authority on necessary upgrades to the nearby NYSEG substation in support of a separate project. These upgrades will result in sufficient capacity to serve the Proposed Action. The implementation of energy conservation through selection of the Geothermal Option limits overall impacts on energy usage which “projects...little or no use of natural gas under ideal conditions” (BOD report), and results in the lowest total projected energy consumption among the available HVAC system options.

As such, it is the opinion of the Planning Board that there are no potentially significant adverse impacts to energy as a result of the Proposed Action.

Telecommunications- Under the Proposed Action, there will be one telecommunications line which will be buried. The location of the proposed line is shown on Sheets C400 and C401. Although there are no anticipated long-term adverse impacts associated with the line, short-term impacts during installation could occur. These include impacts associated with soil disturbance (i.e., erosion and sedimentation) as well as potential safety risks resulting from the open trench. These potential impacts will be minimized through adequate erosion and sediment controls, which will be installed prior to construction as well as the re-establishment of vegetation.

It is the opinion of the Planning Board that since the Proposed Action mitigates potential impacts by design, no significant impacts will result from the telecommunication component of this project.

Water Supply- Water demand for the Proposed Action include 3,500 gallons per day (gpd) for consumptive uses (potable, sanitary, cleaning, etc.) and 2,350 gallons per minute (gpm) for emergency fire suppression. Per the Town of Plattsburgh Water and Wastewater Department letter, dated December 17, 2024, the Plattsburgh Consolidated Water District has sufficient capacity to serve the Site’s anticipated demand of 3,500 gallons per day of sanitary usage. A copy of the letter is provided in Appendix I. It was determined by RAN Fire Protection Engineering (RAN), in their Fire Water Supply Analysis memo, dated December 5, 2024, that the existing municipal water supply capacity of 500 gallons per minute (gpm) to support fire protection would be insufficient for the Proposed Action.

To address this, a new fire protection water storage tank, fire pump, and hydrant loop will be installed at the Site. (See RMS Project Plans, Sheets C400, C401, and C402 for proposed locations of each fire water system component.) Additionally, as part of the proposed fire water system, the proposed warehouse will be equipped with an NFPA-13 compliant sprinkler system consisting of ESFR sprinklers and in-rack sprinklers. Additional details on the fire protection water system, including the sprinklers is provided in RAN’s Fire Water Supply Analysis included in Appendix I. Under the Proposed Action, a 500 gpm-rated fire pump will be supplied by a water storage tank with an anticipated capacity of at least 480,000 gallons. The fire protection water storage tank would supply the fire sprinkler systems within the warehouse building and the fire hydrants located around the warehouse.

Although the Plattsburgh Consolidated Water District has the capacity to serve the Site, there will be a need to extend the existing waterline to the Site. As part of the Proposed Action, a new water service line will be installed extending from NYS Route 22 ROW to an existing municipal pump house. An easement will be provided for the approximate 2,312 ft - waterline extension (see RMS Project Plans, Sheets C400 and C401). Approvals for the waterline extension are anticipated from NYSDEC, Clinton County Health Department, and the Town of Plattsburgh Water and Wastewater Department. Coordination will also be required with New York State Department of Health. Potential short-term impacts include those associated with the installation, such as soil disturbance which has the potential for erosion and sedimentation. These potential impacts will be minimized through adequate erosion and sediment controls, which will be installed prior to construction as well as the re-establishment of vegetation.

As a result of the proposed fire protection water storage tank and fire pump installation, the Proposed Action would not adversely impact the municipal water supply demand. Moreover, the municipal water supply has adequate capacity to serve the Proposed Action inclusive of water storage development on-site, and extending the service line to an existing municipal pump house which will benefit the municipal system. Temporary construction impacts associated with extending service to the Site will be limited and controlled through standard erosion and sediment controls.

As such, the Proposed Action mitigates potential impacts by design; it is therefore the opinion of the Planning Board that the project will not result in potentially significant adverse impacts to water supply.

Wastewater- The Site is currently vacant. Public sewer does not serve the Site. As part of the Proposed Action, an onsite wastewater treatment system (OWTS) will be installed and located south of the warehouse building to serve the wastewater needs of the Site. RMS prepared Engineering Report for On-Site Wastewater Treatment System, dated January 2, 2025, which details the design of the system. As part of the OWTS, there are total of three (3) proposed septic tanks, a 5,500-gallon settling tank, 2,500- gallon septic tank, and 2,000-gallon auxiliary septic tank, two (2) absorption fields, and a pump station. Wastewater will first enter the settling tank and then flow to the 2,500-gallon septic tank to ensure adequate settlement and filtration. It will then enter the auxiliary tank, which provides additional storage volume in the event of pump failure before it is alternatively pumped to the two (2) absorption fields, where it is absorbed into the ground. As discussed in the RMS Engineering Report, all wastewater on-site will be generated from sanitary use (e.g., bathroom facilities) with the exception of the automatic floor washing machines. The water from the floor washing machines will drain to a floor sink equipped with a bag filter to prevent pollutants (e.g., particulates from dirt) from entering the OWTS. The estimated total daily maximum flow for the sanitary use is 1,800 gallons per day (GPD) and is 750 GPD for the automatic floor cleaning system. RMS estimates a total daily maximum flow of 3,315 gallons, which reflects a 30% increase to the combined estimated total for both sanitary use and the floor washing machines to account for future growth.

A NYSDEC SPDES Permit (GP-0-15-001) Groundwater Discharge of Treated Sanitary Sewage will be required for the proposed OWTS. Approvals are also anticipated from the Town of Plattsburgh Water and Sewer Department and Clinton County Health Department.

Under the Proposed Action, an OWTS will be installed at the Site. Potential impacts could occur during construction of the OWTS, including those associated with soil disturbance which has the potential for erosion and sedimentation. Additionally, if not maintained properly, the OWTS could have the potential for groundwater contamination.

However, the OWTS will be maintained and inspected in accordance with the recommended operations and maintenance schedule outlined in the RMS Engineering Report (Appendix I).

Additionally, the proposed septic tanks will be equipped with high water alarms to alert any blockages, as the tanks will have effluent filters and ventilation pipes. Furthermore, power outages should not impact the OWTS and its operation, as the Site will be equipped with generator back-up power.

As the Site will be served by the OWTS which will comply with all the requirements of GP-0-15-001 to protect environmental resources, the Proposed Action mitigates potential impacts by design. It is therefore the opinion of the Planning Board that Proposed Action will not result in potentially significant adverse wastewater impacts.

12. Environmental Justice and Disadvantaged Communities

Impacts: The Site is located entirely within a DAC identified by New York State, Census Tract 36019102100, which has a population of approximately 2,055 residents. Within this DAC, the environmental burden is higher than 72 percent of census tracts statewide and population vulnerability is higher than 53 percent of census tracts statewide. The SDEIS evaluated the potential for the Proposed Action to cause or increase a disproportionate pollution burden on this DAC across five potential exposure pathways – noise, light pollution, air quality, solid waste and hazardous materials, and wastewater – and also considered these impacts cumulatively with other reasonably foreseeable nearby projects, including the Plattsburgh International Airport expansion, the GR8 Courier site plan/change of use, the federal Homeland Security Investigations facility conversion, and the Brunell Subdivision.

Noise- The DEIS Noise Impact Assessment, as supplemented by correspondence dated September 19, 2025 and further addressed in the SDEIS, found that daytime ambient sound levels within the vicinity of the DAC ranged from 48.9 to 65.7 dBA Leq. The Proposed Action is predicted to result in daytime increases of 1 dBA or less at residential receptors and worst-case nighttime increases of up to 5 dBA at certain receptors south of the Site, with absolute levels remaining below the Town's 61 dBA threshold except where existing NYS Route 22 corridor traffic already exceeds that level independent of the Proposed Action.

Light Pollution and Visual Resources- The Proposed Lighting Plan (Sheets C600-C602) employs fully shielded, down-directed, DarkSky-approved LED fixtures mounted at approximately 25 feet above finished grade, with no fixtures located within 20 feet of any property boundary. Photometric analysis demonstrates that illumination will be contained entirely within the Site with no off-site spillover. The Visual Resource Assessment (DEIS Appendix E) found that off-site views of the Site are extremely limited due to existing topography and vegetative screening.

Air Quality- The Site is currently vacant with no existing emission sources. Construction-related emissions (diesel exhaust and fugitive dust) will be short-term and controlled through best management practices, including idling limits, dust suppression, and stabilized construction entrances. Operational emissions are dominated by mobile sources (employee vehicles and trucks); stationary sources are limited to two 8-MMBtu/hr natural gas boilers serving as backup to the geothermal system and intermittent emergency generators, both of which are exempt from air permitting under 6 N.Y.C.R.R. Subpart 201-3 due to low potential to emit. A Mobile Emissions Addendum using AFLEET modeling found aggregate construction and operational emissions well below NYSDEC Air Facility Registration thresholds and substantially lower than existing background emissions from NYS Route 22/I-87 corridor traffic.

Solid Waste and Hazardous Materials- Operational solid waste, consisting primarily of corrugated cardboard, wood pallets, plastic film, and office recyclables, is estimated at approximately 75 cubic yards per week, within the existing capacity of the Clinton County Landfill. The facility will implement on-site recycling and material recovery for cardboard, plastics, and

returnables. No hazardous waste is anticipated, as the facility will not include industrial processes or bulk chemical storage.

Wastewater- In the absence of public sewer, the Proposed Action includes an on-site wastewater treatment system ("OWTS") consisting of three septic tanks, a pump station, and two alternating absorption fields, sized to handle a maximum daily flow of 3,315 gallons per day. The OWTS will be designed, constructed, and maintained in accordance with applicable state and county standards, with alarmed controls, redundancy, and backup generator power.

Cumulative Impacts- The SDEIS evaluated the Proposed Action's potential effects on the DAC in combination with other reasonably foreseeable nearby projects. These other projects are either geographically separated from the Site, limited in scope and duration, or phased such that construction activities would not overlap with the Proposed Action in a manner that would result in prolonged or intensified exposure within the DAC. Operational impacts of the Proposed Action associated with noise, lighting, air quality, solid waste, and wastewater are each individually minor and are small relative to existing background conditions, including existing NYS Route 22 corridor traffic and airport-related activity.

Alternatives- As discussed above in the Alternatives to the Proposed Action, the No Action, Alternative Sites, and Alternative Size alternatives were each considered with respect to their effects on the DAC. Each of these alternatives would either fail to meet the Proposed Action's objectives or would shift, and potentially increase, transportation-related impacts, including truck traffic and associated emissions, without reducing the overall environmental burden on the DAC or on other communities.

Mitigations: The Proposed Action incorporates the following design and operational measures to avoid or minimize potential impacts to the DAC: construction best management practices, including dust suppression, stabilized construction entrances, and erosion and sediment controls; anti-idling and fleet management practices for trucks; noise controls, including equipment shrouding/encapsulation and placement of mechanical equipment away from sensitive receptors, together with sound barriers where warranted, as further described in the Noise discussion above; fully shielded, DarkSky-compliant exterior lighting designed to eliminate off-site illumination; an on-site wastewater treatment system designed to New York State and Clinton County standards, with alarms, redundancy, and backup generator power; and solid waste minimization through on-site recycling of cardboard, plastics, and pallets. These measures are consistent with, and in addition to, the mitigation measures identified in the resource-specific sections above.

Findings: Based on its independent review of the DEIS, FEIS, Responsiveness Summary, and the SDEIS, the Planning Board finds that the Proposed Action is not expected to result in significant adverse impacts related to noise, lighting, air quality, solid waste, or wastewater, whether considered individually or cumulatively with other reasonably foreseeable nearby projects. Accordingly, the Planning Board finds that the Proposed Action would not cause or increase a disproportionate pollution burden on the disadvantaged community, Census Tract 36019102100, in which the Site is located, and that the requirements of ECL § 8-0109(2)(k) have been satisfied through the analysis set forth in the SDEIS and summarized above. No mitigation measures beyond those identified above and elsewhere in this Findings Statement are warranted with respect to the DAC.

13. Cumulative Impacts

The Proposed Project, when added to other past, present, and reasonably foreseeable future actions, would not have the potential to result in significant adverse cumulative impacts. The other background projects in the area surrounding the Project Site are limited in number and size and are typical of the

existing character or smaller in scale than the Proposed Project would also be consistent with the type of development on the existing UMS Property, LLC Industrial Campus.

14. Unavoidable Adverse Impacts

Geology

Construction activities associated with the Proposed Action will temporarily disturb the existing soil profile during clearing and grading activities. However, these soils will be used onsite for grading and will ensure the Site is developed in such a manner to prevent stormwater runoff and to re-establish vegetation, where applicable.

Ecological Resources

The Proposed Action will result in the temporary and permanent removal of common vegetation and habitat. As there are no known occurrences of rare, threatened, or endangered species on-site, it is not anticipated that any of these species will be affected. However, as there is potential for modification of existing habitat types as well as temporary and permanent displacement of the existing common wildlife, some minor adverse impacts to ecological resources may occur as a result of the project. The Proposed Action will also result in the filling of approximately 9.4 acres of freshwater wetlands. Although the wetlands to be filled mostly exist within the south/western fields and were the result of human activity and are currently subject to invasive species, the Proposed Action will include compensatory wetland mitigation offsite. This will be achieved through the expansion of existing and/or establishment of new wetlands on the property or other mechanisms deemed acceptable to USACE and/or NYSDEC for issuance of Freshwater Wetlands Permits, and will result in greater wetland acreage and higher-quality wetland habitats than what currently exists at the Site.

Visual Resources

There will be some minor impacts to visual resources, but none is considered to be significant. Some key observation points (KOPs) along NYS Route 22 will have views of the Site. However, views of Site from visual sensitive resources will not significantly differ from existing conditions. Furthermore, landscape character is not changed by the addition of the Proposed Action. As detailed in the Technical Memorandum - Summary Visual Resource Assessment, significant topographic and vegetative screenings will protect the Site from view from most directions except the northeast. These areas are mostly along I-87 and open areas associated with the Plattsburgh Airport. Vegetative screening will further limit the views of the Site, unless the view is from directly adjacent to the Site.

Traffic

The unavoidable Impacts from traffic are not considered to be significant. The Proposed Action will generate an estimated 102 trips during the AM peak hour and 122 trips during the PM peak hour. The study area intersections will not experience significant increases in delay as a result of these new trips. Although the eastbound approach of Irish Settlement Road with NYS Route 22 will operate at an E-F level of service at peak hours, it is recommended for monitoring to determine if signalization is needed, as analysis indicates long delays during peak hours currently exist. This will not alter as a result of the Proposed Action.

Construction Noise

As described in the EIS, construction related activities have the potential to result in short-term noise impacts during the daytime when construction activity is occurring at the south end of the Site. At a

minimum the following mitigation measure and BMPs will be incorporated into the various phases of site development to reduce potential noise impacts.

- Construction activities will be limited to daytime hours;
- All construction equipment will be maintained with properly functioning noise reduction muffler systems per manufacturer's specifications as part of construction contracts and contractor responsibilities;
- Earth-moving equipment and dump trucks will be restricted from "tail gate banging" during sensitive times of the day (early morning and late evening) and when operating near residential receptors;
- Building construction near adjacent residential receptors will consider phasing opportunities and scheduling work to reduce potential noise impacts by erecting buildings, berms, stockpiling materials, structure placement, etc. to interrupt sight lines and therefore reduce noise levels being generated in the direction of sensitive receptors as construction advances on-site;
- Haul roads, access drives, materials storage areas, staging areas, etc. will be placed as far from sensitive receptors and internal to central portions of the site to the greatest extent practicable; and
- Noise control equipment shrouding and/or temporary noise control fencing/walls will be installed when necessary to prevent significant off-site noise impacts.

Operational Noise

The results of the highly conservative model presented in the Noise Impact Assessment indicate a potential to increase sound levels by up to 6 dB(A) at nearby residences to the south of the Site, a potentially significant impact. Mitigation measures will be implemented to ensure that potentially significant impacts to noise will not occur from facility operations by limiting sound level increases at proximal residential receptors to 4 dB(A) or less. Those mitigation measures may include:

- Selecting alternate facility mechanical equipment with lower levels of sound emissions;
- Selecting alternate locations for facility mechanical equipment;
- Installing noise control shrouding/encapsulation on facility mechanical equipment;
- Installing noise control fencing along the south margins of the Site;
- Installing noise control walls/fencing on the facility roof between the facility mechanical equipment and residential receptors; and
- Other technological or operational measures that will reduce noise impacts by at least 2 dB(A).

15. Growth Inducing Impacts

The Proposed Project would not result in significant adverse growth-inducing impacts. The Proposed Project consists of the construction of a warehouse and distribution facility that will largely accommodate the storage and shipment of material currently stored in multiple locations in Plattsburgh and nearby communities. It will also accommodate potential future manufacturing at the nearby industrial campus. The Proposed Project will extend existing water infrastructure to nearby residential neighborhoods. The extent that nearby residential development may increase as a result of the new water infrastructure is unlikely considering residential development is already an allowed use in the district and adjacent neighborhoods are developed primarily with private wells.

16. Summary of Mitigation Measures Proposed

The Proposed Project has been designed to avoid significant adverse impacts. The mitigation discussed in the DEIS, FEIS, and herein, and those required by applicable laws and regulations are adequate to

address and minimize any remaining impacts to the maximum extent practicable.

17. Alternatives to the Proposed Action

No Action Alternative

The “No Action” alternative means that the proposed warehouse and distribution center would not be constructed. However, the demand for consolidated storage and distribution operations would remain, which would result in the development at another location. As such, constructing the warehouse and distribution center would limit potential impacts by keeping them localized to the existing nearby manufacturing facility. Therefore, the no action alternative is not a reduction of impacts, but instead a shifting of impacts to another location. The disadvantages associated with the no action alternative can be considered significant and include:

- Failure to provide economic growth and development at the local and regional levels;
- Failure to maintain and create jobs; and
- Failure to meet UMS’ long-term fiscal goals.

Alternative Sites

The Site is located within one mile of UMS’ existing manufacturing facility and is zoned Industrial (I*), where the proposed use is allowed by site plan approval. UMS has entered a purchasing agreement to buy the Site for the Proposed Action. UMS does not own or control additional properties in the immediate vicinity that would meet the needs of the project, including the size requirements. The project location was selected after approximately two years of site selection where other properties in the Town were researched for suitability. These locations included Hammond Lane, Reeves Lane (City of Plattsburgh), and the former Clinton County Airport. These sites were deemed infeasible due to lack of seller interest, contiguity of parcels, site suitability, availability of utilities, PFAS contamination, and topographical constraints. If another site were to be selected, it would be much further away from the existing manufacturing facility, resulting in potential increase in traffic, air impacts and associated traffic noise.

The Site has been selected to minimize these impacts due to its location and current zoning designation. Furthermore, the existing community is already familiar with UMS and their existing manufacturing operations. If another site were to be selected outside of the Town of Plattsburgh or the vicinity of the existing UMS facility, potential impacts to community character may be greater in magnitude depending on the specific location.

Alternative Size

The scale of the Proposed Action could be altered by a smaller building footprint. However, this would not meet the need of UMS for consolidated and expanded storage and distribution operations. This would also not eliminate potential environmental impacts resulting from a larger size building. Although an alternate scale may decrease potential impacts on natural resources, the potential impacts on traffic and the demand for utilities and community services would still remain.

Additionally, the design of the building is such that material is capable of being stored up to 90 ft in height, reducing the overall footprint of the building and allowing for more efficient material handling. Based on initial and continuing investment toward the project, further downsizing of the Proposed Action would affect the economic viability of the project, without providing any significant environmental benefit. There are substantial costs associated with the start of the operation. These costs include: site development, equipment, permitting and environmental review. The outlay of capital dollars is substantial and continues throughout the life of the project, while a return on investment occurs only after permit issuance,

commencement of operations and product sales.

[certification follows]

CERTIFICATION OF FINDINGS TO APPROVE/FUND/UNDERTAKE

Having considered the Draft and Final EIS, including all comments submitted through the *SEQR* process and responses thereto, and having considered the preceding written facts and conclusions relied upon to meet the requirements of the *State Environmental Quality Review Act*, codified at Article 8 of the New York *Environmental Conservation Law*, and its implementing regulations, promulgated at Part 617 of Title 6 of the *N.Y.C.R.R.*, including 6 *N.Y.C.R.R.* § 617.11, this Statement of Findings certifies that:

1. The requirements of 6 *N.Y.C.R.R.* Part 617 have been met; and
2. Consistent with the social, economic and other essential considerations from among the reasonable alternatives thereto, the action approved is one which minimizes or avoids adverse environmental effects to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized by incorporating as conditions to the decision those mitigative measures which were identified as practicable.

Town of Plattsburgh Planning Board

(Name of Agency)

(Signature of Responsible Officer)

(Name of Responsible Official)

(Title of Responsible Official)

(Date)

151 Banker Road Plattsburgh, New York

(Address of Agency)

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