SEQR Part 3 Attachment – Reasons Supporting Determination
Rye Neck Union Free School District

Explanation of Part 2 Impact Determinations
This Part 3 analysis has been prepared to address all relevant areas of environmental concern as identified in the review by the Lead Agency. This Part 3 analysis will discuss and explain the analysis of the potential impacts, and why a particular element of the proposed action will not result in a significant adverse environmental impact. Such analysis is appropriately set forth in Part 3, even if the potential impact was identified as "none" or "small." Based upon a review of Parts 1 and 2 of the Full Environmental Assessment Form (EAF) and all other materials that were submitted in support of the Proposed Action, along with information from the Lead Agency's professional consultants, involved and interested agencies, and information from the public, the Rye Neck Union Free School District, acting as Lead Agency, provides the following rationale for its SEQRA Determination of Non-Significance.

1. Impact on Land
Proposed action may involve construction on, or physical alteration of the land surface of the proposed site.
Yes

1.a *The proposed action may involve construction on land where depth to water table is less than 3 feet.*
No Impact:
The Geotechnical reports groundwater 4.5' depth and greater.

1.b *The proposed action may involve construction on slopes of 15% or greater.*
Small Impact:
Small areas may require slopes to be steeper than 15%, however those areas are expected to be limited and will be stabilized in accordance with New York State Standards for Erosion and Sediment Control (2016) and the New York State Stormwater Management Design Manual (2024).

1.c *The proposed action may involve construction on land where bedrock is exposed, or generally within 5 feet of the existing ground surface.*
No Impact:
Per the geotechnical investigations and report bedrock was not encountered.

1.d *The proposed action may involve the excavation and removal of more than 1,000 tons of natural material.*
No Impact:
This question is in reference to mining or dredging operations, and not general construction activities, so the answer to this question is "No Impact".

1.e *The proposed action may involve construction that continues for more than one year or in multiple phases.*
Small Impact:

The project is anticipated to be completed within approximately 18-24 months; however, weather conditions and site restoration activities may extend the overall construction schedule. While temporary erosion may occur during construction, appropriate erosion and sediment control measures will be implemented in accordance with applicable regulations to minimize impacts. Following completion of construction and site stabilization, long-term erosion is not anticipated, and no adverse impacts to water quality are expected. Therefore, the potential impact is considered small.

1.f *The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal (including from treatment by herbicides).*
Small Impact:
As with most construction projects involving earth disturbance, there is potential for soil erosion during construction activities. However, the anticipated impact is considered small because erosion and sedimentation will be minimized through the implementation of New York State-approved erosion and sediment control practices. A Stormwater Pollution Prevention Plan (SWPPP) will be prepared as part of the project to specifically address erosion and sediment control measures during construction, as well as long-term stormwater management following project completion.
Throughout construction, qualified personnel will conduct regular inspections of all erosion and sediment control measures to verify proper installation, performance, and maintenance. In addition, post-construction stormwater management practices will be incorporated into the project design to treat and manage runoff prior to discharge from the site. As a result, no significant long-term impacts to water quality are anticipated. Furthermore, the project does not involve the application of herbicides or other chemical treatments that could adversely affect surface water or groundwater resources.

1.g *The proposed action is, or may be, located within a Coastal Erosion hazard area.*
No Impact:
The proposed action is not located within a Coastal Erosion hazard area.

2. Impact on Geological Features
The proposed action may result in the modification or destruction of, or inhibit access to, any unique or unusual land forms on the site (e.g., cliffs, dunes, minerals, fossils, caves).
No

3. Impact on Surface Water
The proposed action may affect one or more wetlands or other surface water bodies (e.g., streams, rivers, ponds or lakes).
Yes

3.a *The proposed action may create a new water body.*
No Impact:
A stormwater management basin will be created as part of the project, however it is isolated to the project site, is of minimal size, and does not adversely affect rare or unusual or listed species, habitats, or critical environmental areas.

3.b *The proposed action may result in an increase or decrease of over 10% or more than a 10 acre increase or decrease in the surface area of any body of water.*
No Impact:
The project will not increase or decrease surface area of any body of water.

3.c *The proposed action may involve dredging more than 100 cubic yards of material from a wetland or water body.*
No Impact:
Dredging is not proposed for this project.

3.d *The proposed action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body.*
Small Impact:
The project will not result in any direct disturbance to wetlands. However, portions of the project are located within the 100-foot adjacent area of a New York State Department of Environmental Conservation (NYSDEC) regulated wetland. As a result, a NYSDEC Freshwater Wetlands Permit will be required for activities within the regulated adjacent area. All construction activities will be conducted in strict accordance with the conditions of the permit and applicable NYSDEC regulations and standards. Appropriate erosion and sediment control measures will be implemented to protect the adjacent wetland resource during construction. Therefore, any potential impacts to wetlands are anticipated to be minimal.

3.e *The proposed action may create turbidity in a waterbody, either from upland erosion, runoff, or by disturbing bottom sediments.*
Small Impact:
Disturbance of bottom sediments impacts will be controlled during construction will be managed using New York State approved soil and erosion control practices. Additionally, a Stormwater Pollution Prevention Plan (SWPPP) will be prepared to directly address how erosion and sediment will be controlled during construction. Weekly inspections by a NYS Approved inspector will be completed during construction to observe all erosion and sediment control devices to confirm they are adequately performing and being maintained. Post-construction stormwater management devices will be implemented to treat runoff prior to discharging off-site. The post-construction stormwater management devices will be designed in accordance with the New York State Stormwater Design Manual. The stormwater management devices will allow sediments to settle and/or filter out before stormwater enters existing drainage patterns, further reducing the potential impact of this project on the turbidity of receiving water bodies. Disturbance of bottom sediments, if any will be temporary and minor turbidity affecting only a small portion of the wetland.

3.f *The proposed action may include construction of one or more intake(s) for withdrawal of water from surface water.*
No Impact:
The project does not include any water withdrawal from surface water.

3.g *The proposed action may include construction of one or more outfall(s) for discharge of wastewater to surface water(s).*
No Impact:
The project does not propose any discharge of wastewater.

3.h *The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.*
Small Impact:
Erosion and sediment impacts during construction will be managed using New York State approved soil and erosion control practices. The erosion control practices will be designed in accordance with the New York State Standards for Erosion and Sediment Control (2016). Additionally, a Stormwater Pollution Prevention Plan (SWPPP) will be prepared to directly address how erosion and sediment will be controlled during construction. Weekly inspections by a NYS Approved inspector will be completed during construction to observe all erosion and sediment control devices to confirm they are adequately performing and being maintained. Post-construction stormwater management devices will be implemented to treat runoff prior to discharging off-site. The post-construction stormwater management devices will be designed in accordance with the New York State Stormwater Design Manual. The stormwater management devices will allow sediments to settle and/or filter out before stormwater enters existing drainage patterns, further reducing the potential impact of this project on the turbidity of receiving water bodies.

3.i *The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.*
Small Impact:
Water quality impacts will be mitigated through the implementation of erosion and sediment control practices and installation of stormwater management devices. Stormwater runoff will be directed to stormwater management practices (bioretention areas) in compliance with Stormwater Pollution Prevention Plan (SWPPP) and with the New York State Standards for Erosion and Sediment Control (2016) and the New York State Stormwater Management Design Manual (2024).

3.j *The proposed action may involve the application of pesticides or herbicides in or around any water body.*
No Impact:
The project does not involve the use of pesticides or herbicides.

3.k *The proposed action may require the construction of new, or expansion of existing, wastewater treatment facilities.*
No Impact:
The project does not involve construction of new or expansion of existing wastewater treatment facilities.

4. Impact on groundwater

The proposed action may result in new or additional use of ground water, or may have the potential to introduce contaminants to ground water or an aquifer.

No

5. Impact on flooding

The proposed action may result in development on lands subject to flooding.

Yes

Note all proposed work shall be designed in accordance with federal, state and local municipality's floodplain management law or ordinance. Including US Code, Title 42 – NFIP, Title 44 CFR, Part 60m, International Building Code (IBC) 2021 and ASCE 24-24

5.a. The proposed action may result in development in a designated floodway.

Small Impact:

The majority of the proposed improvements within the designated floodway involve the replacement of existing facilities, including dugouts, backstops, bullpens, and bleachers. New improvements are limited to the addition of a batting cage and supplemental bullpen facilities. Significant earthwork is not anticipated as part of the project, and therefore no measurable impacts to flood elevations are expected. All proposed improvements will be designed in compliance with the requirements of the applicable regulatory agencies and governing authorities identified above.

5.b. The proposed action may result in development within a 100-year or a 500-year floodplain.

Moderate Impact:

Since approximately 52% of the project site is within the 100-year floodplain and approximately 15% is located in the 500-year floodplain. However, that majority of the site improvements within the 100-year floodplain are replacement of existing features as well as new site components including a batting cage, bullpens and synthetic turf field. Proposed improvements within the 500-year floodplain include portions of the relocated running track, new synthetic turf fields, a grandstand with press box, a concessions building, and associated pedestrian walkways. Site grading will be designed to balance cut and fill quantities to the greatest extent practicable, minimizing impacts to flood elevations and flood storage capacity. All proposed improvements will be designed in accordance with the requirements of the applicable regulatory agencies and governing authorities identified above.

5.c. The proposed action may result in development in an area potentially affected by sea level rise.

No Impact:

The Project Site is located within the Lower Hudson–New York City Region as defined in 6 NYCRR §490.3. Under 6 NYCRR §490.4(b), projected sea level rise for this region at a 2100 time horizon ranges from approximately 3 feet (medium projection) to 5.4 feet (high projection), with a rapid ice melt projection of approximately 9.5 feet. According to the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management's Sea Level Rise Viewer, the Project Site remains outside the area of projected inundation even at a modeled increase of 10 feet, which exceeds all Part 490 projections for the region, including the rapid ice melt scenario. Sea level rise alone is therefore not anticipated to inundate the Project Site.

5.d. The proposed action may result in, or require, modification of existing drainage patterns.

Small Impact:

Surface drainage patterns will be modified primarily within the proposed synthetic turf field areas. Unlike natural grass surfaces, synthetic turf fields are designed to drain vertically through the turf system and underlying stone base rather than convey runoff across the surface. The anticipated impact is considered minor, as all stormwater runoff will be collected, managed, and discharged to existing drainage outfalls in accordance with the project Stormwater Pollution Prevention Plan (SWPPP), the New York State Standards and Specifications for Erosion and Sediment Control (2016), and the New York State Stormwater Management Design Manual (2024). Stormwater management practices will be designed such that post-development runoff rates and volumes do not exceed existing conditions, thereby avoiding adverse impacts to downstream drainage patterns and flood elevations.

5.e. The proposed action may change flood water flows that contribute to flooding.

No Impact:

The project does not involve major clearing activities or alteration to any water bodies. Additionally, all proposed improvements will be designed in compliance with the requirements of the applicable regulatory agencies and governing authorities identified above.

5.f If there is a dam located on the site of the proposed action, is the dam in need of repair, or upgrade?

No Impact:

The project site does not contain a dam.

6. Impact on Air and Climate

The proposed action may include a state-regulated air emission source.

No

7. Impact on Plants and Animals

The proposed action may result in a loss of flora or fauna.

No

The new improvements are within existing developed property and will not impact habitat.

8. Impact on Agricultural Resources

The proposed action may impact agricultural resources.

No

There are no agricultural resources on or immediately adjacent to the project site.

9. Impact on Aesthetic Resources

The land use of the proposed action are obviously different from, or are in sharp contrast to, current land use patterns between the proposed project and a scenic or aesthetic resource.

No

The new improvements are within existing developed property with the same use.

10. Impact on Historic and Archeological Resources

The proposed action may occur in or adjacent to a historic or archaeological resource.

No

11. Impact on Open Space and Recreation

The proposed action may result in a loss of recreational opportunities or a reduction of an open space resource as designated in any adopted municipal open space plan.

No

The project will increase recreational opportunities.

12. Impact on Critical Environmental Areas

The proposed action may be located within or adjacent to a critical environmental area (CEA).

No

13. Impact on Transportation

The proposed action may result in a change to existing transportation systems.

No

The proposed project will not change the overall use or function of the campus. While the improvements may enhance existing facilities, they are not expected to generate traffic volumes beyond those already experienced during existing campus events such as athletic competitions, concerts, commencement ceremonies, and other large gatherings. As a result, the project is not anticipated to result in a significant increase in traffic, parking demand, or transportation-related impacts.

14. Impact on Energy

The proposed action may cause an increase in the use of any form of energy.

Yes

14.a *The proposed action will require a new, or an upgrade to an existing, substation.*

No Impact

The project does not require the construction, expansion, or upgrading of electrical substations. The proposed project will result in an increase in electrical demand associated with the new field house and locker room building, athletic field lighting, and pedestrian lighting systems, however, in accordance with NYSDEC SEQR guidance, the project is not expected to result in a significant adverse impact on energy use.

14.b *The proposed action will require the creation or extension of an energy transmission or supply system to serve more than 50 single or two-family residences or to serve a commercial or industrial use.*

No Impact

The project does not require the construction, expansion, or upgrading of energy transmission infrastructure. In accordance with NYSDEC SEQR guidance, the project is not expected to result in a significant adverse impact on energy use.

14.c *The proposed action may utilize more than 2,500 MW hrs per year of electricity.*
No Impact
The project is not anticipated to consume more than 2,500 megawatt-hours of energy annually. While energy consumption will increase modestly, according to NYSDEC SEQR guidance, the project is not expected to have a significant impact on energy resources or energy infrastructure.

14.d *The proposed action may involve heating and/or cooling of more than 100,000 square feet of building area when completed.*
No Impact
The proposed project will result in an increase in electrical demand associated with the new field house and locker room building, athletic field lighting, and pedestrian lighting systems. However, in accordance with NYSDEC SEQR guidance, the project is not expected to result in a significant adverse impact on energy use. The proposed building area is well below 100,000 square feet. As a result, while energy consumption will increase modestly, the project is not expected to have a significant impact on energy resources or energy infrastructure.

15. Impact on Noise, Odor, and Light
The proposed action may result in an increase in noise, odors, or outdoor lighting.
Yes

15.a *The proposed action may produce sound above noise levels established by local regulation.*
Small Impact:
Construction activities associated with the project will generate temporary increases in noise levels from construction equipment, construction vehicles, and power tools that may exceed existing ambient conditions. However, these impacts are considered small due to their temporary nature and limited duration during the construction period.
Noise levels during athletic events may periodically exceed existing ambient conditions, however these impacts are expected to be infrequent and consistent with the existing recreational and institutional use of the campus. Therefore, the overall impact on noise levels is considered small.

15.b *The proposed action may result in blasting within 1,500 feet of any residence, hospital, school, licensed day care center, or nursing home.*
No Impact

15.c *The proposed action may result in routine odors for more than one hour per day.*
No Impact

15d. *The proposed action may result in light shining onto adjoining properties.*
Small Impact: Athletic field lighting will be visible from adjoining properties when in use; however, the lighting system will be designed with full-cutoff LED fixtures and appropriate shielding to focus illumination on the playing fields and minimize off-site light spill and glare. Photometric design criteria will be used to ensure light trespass at adjacent properties is minimized and consistent with accepted engineering practices. Therefore, any off-site lighting effects are expected to be minor and not significant.

15.e *The proposed action may result in lighting creating sky-glow brighter than existing area conditions.*
Small Impact:
Photometric analysis of the proposed athletic field lighting indicates that light levels will be contained within the project site and will not result in measurable light trespass onto adjacent properties. While direct illumination beyond the property boundaries is not anticipated, some increase in ambient nighttime brightness, commonly referred to as "sky glow," may be perceptible from surrounding areas during periods when the field lights are in operation.
To minimize these effects, the lighting system will utilize modern LED fixtures with precision optics, full-cutoff shielding, and directional aiming designed to meet current Dark Sky principles and best practices for minimizing off-site light pollution. In addition, the project site is substantially buffered by mature wooded areas, which provide effective visual screening and further reduce the potential for off-site lighting impacts.
Based on the photometric analysis, lighting design, and existing vegetative buffers, the proposed action is expected to result in only a small adverse impact related to sky glow.

16. Impact on Human Health
The proposed action may have an impact on human health from exposure to new or existing sources of contaminants.
No

17. Consistency with Community Plans
The proposed action is not consistent with adopted land use plans.
No

18. Consistency with Community Character
The proposed project is inconsistent with the existing community character.
No

19. Impact on Disadvantaged Communities
The proposed project may impact a disadvantaged community.
Yes

19.a *Is the potentially affected disadvantaged community identified as having comparatively higher burdens or vulnerabilities by the Disadvantaged Community Assessment Tool?*
No Impact:
The two DACs located within ½ mile of the project site (Census tracts 36119008403 and 36119007401) are identified as having comparatively lower burdens and vulnerabilities according to the Disadvantaged Community Assessment Tool.

19.b *The proposed action may create new air emissions or increase existing air emissions within a disadvantaged community.*
No Impact:
The proposed action includes no stationary sources of air emissions and requires no DEC air pollution control permit. No new or increased air emissions will occur within the nearby disadvantaged communities.

19.c *The proposed action may create new wastewater treatment or discharges, or expand existing wastewater treatment or discharges, within a disadvantaged community.*
No Impact:
The project does not propose any new or expanded discharges of wastewater.

19.d *The proposed action creates or expands a solid or hazardous waste management facility, or involves the generation of solid or hazardous waste, within or near a disadvantaged community.*
No Impact:
The project does not involve the management or disposal of solid or hazardous waste.

19.e *The proposed action may increase traffic within a disadvantaged community.*
No Impact:
The proposed project will not change the overall use or function of the campus. While the improvements may enhance existing facilities, they are not expected to generate traffic volumes beyond those already experienced during existing campus events such as athletic competitions, concerts, commencement ceremonies, and other large gatherings. As a result, the project is not anticipated to result in a significant increase in traffic, parking demand, or transportation-related impacts.

19.f The *proposed action affects or involves one or more of the following facility types: i. landfill; ii. other industrial, manufacturing, or mining land uses; iii. major oil or chemical bulk storage facility; iv. municipal waste combustor; v. power generation facility; vi. risk management plan site; vii. remediation site; or viii. scrap metal processor.*
No Impact/NA to all of the above.

20. Future Physical Climate Risks
The proposed project may be vulnerable to future physical climate risks or increase the vulnerability of human or ecological communities to future physical climate risks.
Yes

20.a *The proposed action is vulnerable to damage from a projected 100-year flood.*
Small Impact:
Approximately 52% of the project site is within the 100-year floodplain. However, the majority of the site improvements within the 100-year floodplain are replacement of existing features as well as new site components including a batting cage, bullpens and synthetic turf field. Site grading will be designed to balance cut and fill quantities to the greatest extent practicable, minimizing impacts to flood elevations and flood storage capacity. All proposed improvements will be designed in accordance with the requirements of the federal, state and local municipality's floodplain management law or ordinance; including US Code, Title 42 – NFIP, Title 44 CFR, Part 60m, International Building Code (IBC) 2021 and ASCE 24-24.

20.b *The proposed action is vulnerable to damage from a projected 500-year flood.*
Small Impact:
Approximately 15% of the project site is located within the 500-year floodplain. Proposed improvements within the 500-year floodplain include portions of the relocated running track, new synthetic turf fields, a grandstand with press box, a concession building, and associated pedestrian walkways. Site grading will be designed to balance cut and fill quantities to the greatest extent practicable, minimizing impacts to flood elevations and flood storage capacity. All proposed improvements will be designed in accordance with the requirements of the federal, state and local municipality's floodplain management law or ordinance; including US Code, Title 42 – NFIP, Title 44 CFR, Part 60m, International Building Code (IBC) 2021 and ASCE 24-24.

20.c *The proposed action is in an area potentially affected by sea level rise.*
No Impact:
The project site is located inland and is not within any area potentially affected by sea level rise as delineated under 6 NYCRR Part 490. The site does not adjoin tidal waters, the tidal Hudson River, Long Island Sound, or the marine district.

20.d *The proposed action may increase the vulnerability of human or ecological communities to the following:*

i. Drought

No Impact:
The proposed action does not increase the vulnerability of human or ecological communities to drought. The project does not introduce significant new water demand and does not rely on a stressed water supply.

ii. Temperature extremes (hot or cold)

Small Impact:
The proposed action replaces natural turf playing surfaces with synthetic turf across portions of the site. Synthetic surfaces retain and re-radiate heat to a greater degree than natural vegetation. The action therefore has the potential to increase localized heat exposure for the school-age athletes utilizing the facility. The affected area is expected to be limited to the field surfaces themselves and would not extend to surrounding residential or ecological receptors. Exposure is intermittent, occurring only during scheduled use, and is subject to administrative control by the School District through heat-advisory

restrictions and hydration protocols. The impact is considered small due to its limited geographic extent, intermittent duration, and opportunity for reduction via operational controls.

iii. Extreme storms, including high winds

No Impact:

Existing natural buffers, including perimeter vegetation and the adjacent wetland complex, will be preserved and their protective functions maintained.

iv. Landslides

No Impact:

The project site is relatively flat and is not located within an area identified as susceptible to landslides or slope failure. The proposed action does not create or steepen slopes, does not remove slope-stabilizing vegetation on steep terrain, and does not place structures below unstable slopes.

v. Coastal erosion

No Impact:

The project site is inland and is not located within a designated Coastal Erosion Hazard Area. The proposed action does not adjoin a shoreline, bluff, dune, or beach, and will not affect any coastal protective feature. No impact.

vi. Stormwater flooding

Small Impact:

The proposed action involves improvements within the floodway, 100-year floodplain, and 500-year floodplain which may increase vulnerability to stormwater flooding. All stormwater runoff will be collected, managed, and discharged to existing drainage outfalls in accordance with the project Stormwater Pollution Prevention Plan (SWPPP), the New York State Standards and Specifications for Erosion and Sediment Control (2016), and the New York State Stormwater Management Design Manual (2024). Stormwater management practices will be designed such that post-development runoff rates and volumes do not exceed existing conditions. Site grading will be designed to balance cut and fill quantities to the greatest extent practicable, minimizing impacts to flood elevations and flood storage capacity. All proposed improvements will be designed in accordance with the requirements of the applicable regulatory agencies and governing authorities identified above.

With these measures in place, the anticipated increase in vulnerability to stormwater flooding is minor in magnitude, is confined to the project site and its existing receiving drainage system, and stormwater runoff will not flow to adjacent properties. Related impacts are further addressed under Questions 3 and 5 above.

vii. Other climate or weather hazards?

No Impact

Summary

Based upon this information and the information in the Full Environmental Assessment Form and all other documents and information in the record, the Lead Agency finds that the Proposed Action will not have any significant adverse impacts upon the environment. This Negative Declaration indicates that no environmental impact statement need be prepared and that the SEQRA process is complete.