6 Cumulative Impacts

This section examines the potential cumulative impacts that may result from the implementation of the ROC Master Plan. A cumulative impact is the effect on the environment that could result from the incremental impact of the proposed action when added to other past, present, or reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions that take place over time. Accordingly, a cumulative impact analysis identifies and defines the scope of other actions and their interrelationship with the proposed action or its alternatives if they overlap in space and time.

6.1 Study Area

The geographic scope of this analysis has incorporated the characteristics of the resources that may be affected, including social, economic, and natural environments. For the purposes of this analysis, the study area for this cumulative impact analysis is the ROC and its adjacent neighborhoods, including Olmsted Crescent, BSC Campus, Grant-Amherst, Forest Avenue and vicinity, Elmwood Village, and Grant-Ferry.

6.2 Other Planned Non-Project Actions

Other reasonably foreseeable non-project actions occurring in the study area include the following:

- **Buffalo State College Master Plan.** BSC is currently completing a master plan that outlines needed capital investments to provide a 'road map' for decisions about capital improvements. Specifically, the draft master plan identifies a large increase in total student classroom, residential, and operational building space and infrastructure, landscaping, and circulation improvements. The plan identifies three potential campus growth strategies that would strengthen the core of the campus, strengthen the campus's relationship to Rockwell Road and the ROC, and develop college land west of Grant Street (BSC 2010b). More than $300 million in funding has been allocated for planning, construction, and improvements to the campus (BSC 2010c). In addition, BSC is projecting growth in total student population from 11,000 today to 14,000 by the year 2023. The plan identifies the following on-going and potential future campus development:

1. New science and mathematics complex (i.e., three-level, 222,000 GSF);
2. New technology building;
3. New student apartment complex (i.e., 507 beds);
4. Renovations to student dormitories;
5. Renovations to the Houston Gym;
6. Proposed new Campus Life Building;
7. Proposed 900-space structured parking facility;
8. Proposed new campus operations center;
9. Proposed 4,000-seat athletic stadium;
10. Upgrade to campus infrastructure; and
11. Improved pedestrian, bike, transit, and vehicle accommodations.

- **The Buffalo Olmsted Park System: Plan for the 21st Century.** The Buffalo Olmsted Park System: Plan for the 21st Century is a blueprint for the future of Buffalo's unique cultural landscape. Charged with the management and operations of City-owned parks since 2004, the Buffalo Olmsted Parks Conservancy initiated an inclusive and comprehensive planning process with the goal of restoring the system and enhancing the parks and parkways in ways that respect their status as important neighborhood, regional, national, and international resources. The priorities of the plan include fixing the 'basics' of the parks, attending to the landscape and vegetation, the operations and management, paths and trails, recreational opportunities, branding and signage, and amenities such as water, restrooms, and benches. At the same time, the historic restoration goals are also a priority as addressing such are expected to enhance the Olmsted cultural landscape and build on a heritage tourism economy that is growing in the region. While the ROC is neither a component of the plan nor a facility maintained by the Buffalo Olmsted Parks Conservancy, the plan nonetheless calls for integrating the ROC into the Olmsted system.

6.3 Cumulative Impacts

No long-term, significant adverse cumulative impacts are expected from implementation of the ROC Master Plan along with the other planned construction projects. Minor traffic and parking impacts would be expected due to the growth in traffic associated with both the implementation of the ROC Master Plan and growth of the BSC campus and student population. Specifically, construction of the East-West Address Road, a private internal drive, would require a curb cut onto and would direct site traffic onto Rockwell Road, a private road utilized by BSC. Implementation of the Project would also result in the loss of 713 existing BSC surface parking spaces located on the ROC -

558 spaces located on ±42-acre "surplus" lands and 155 parking spaces located adjacent to the BSC maintenance building. It would be expected that the demand for parking generated by the reuse of the Buffalo State Hospital combined with the loss of BSC parking and the demand generated by the BPC and BSC (i.e., staff and students) would generate demand for parking on the ROC and in the neighborhoods adjacent to it. However, the mixed-use character of the Master Plan would somewhat temper these impacts, given that land uses vary in their peak demand period.

An assessment of potential ROC and BSC parking impacts will need to be made following the development of a site parking plan which should include a future parking demand and utilization analysis, detailed parking configuration designs, and a parking management plan to better understand the needs of the users being served at the ROC and the BSC.

Construction activities associated with the implementation of the ROC Master Plan and development and renovation of the BSC campus would be expected to result in short-term cumulative construction impacts. Construction impacts could include localized and temporary impacts to sound levels, air quality, on-site parking, traffic, and visual impacts. Short-term noise impacts associated with construction-related vehicles would be regulated by local and State regulations and standards. Air quality impacts would be limited to short-term increases in fugitive dust and mobile source emissions from construction equipment. The RCC will consult with BSC to develop measures to maintain Project Area, ROC, and BSC parking, vehicular, and pedestrian traffic and circulation. In addition, the RCC will coordinate with BSC and other adjacent property owners and operating entities (e.g., BPC, OMH, and Burchfield Penney Art Center, etc.) in advance of the start of construction activities.

The RCC will need to work with BSC to ensure that future development activities and operations do not conflict with and can be integrated (if appropriate) with one another's short- and long-term operational needs.

7 Other Considerations

7.1 Unavoidable Adverse Effects

This section identifies unavoidable adverse effects that may occur as a result of implementing the ROC Master Plan. Certain adverse environmental impacts can be expected to occur regardless of the mitigation measures employed; for example, there is typically permanent loss of vegetation when building a new facility and any related parking. Because such unavoidable impacts must be factored into final agency decision making, the SEQRA regulations provide that an EIS must contain an identification and assessment of impacts that cannot be avoided or adequately mitigated. The potential for short- and long-term adverse impacts would be localized in the vicinity of the Project Area and are described below.

7.1.1 Short-Term Unavoidable Impacts

Construction-phase impacts would include localized and temporary impacts to sound levels, air quality, on-site parking, and visual impacts. Short-term noise impacts associated with construction-related vehicles would be regulated by local and State regulations and standards. Air quality impacts would be limited to short-term increases in fugitive dust and mobile source emissions from construction equipment. Measures to maintain on-site parking, vehicular, and pedestrian traffic and circulation, as well as through the Project Area, during construction, will be developed by the RCC in conjunction with the construction phasing plan. In addition, the RCC will coordinate with BSC and other entities co-located (e.g., BPC, OMH, and Burchfield Penney Art Center) at the ROC in advance of the start of construction activities. The RCC will establish a working committee with the BPC and OMH for the purpose of discussing access and operational issues during the various phases of project implementation and operations. Avoidance measures will be incorporated in construction documents prior to their release for bid. Additionally, the RCC will designate a point of contact to coordinate and respond to specific concerns from the BPC and OMH during project construction and future operations.

7.1.2 Long-Term Unavoidable Impacts

Overall, the Project would have significant, positive long-term impacts. The Project would result in the stabilization and reuse of the historic Buffalo State Hospital, which is currently vacant, and would redevelop a portion of the ROC as a mix of commercial and cultural uses. However, with just about any form of

sizable urban development would come long-term impacts, such as minor increased vehicular traffic and potential visual impacts resulting from the Development Landholding phase of the ROC Master Plan. Overall, the Project would not be expected to result in any significant adverse long-term impacts to the Project Area, including cultural resources, land use, socioeconomics, environmental management, community services, utilities, air quality, noise, and physical and ecological resources.

7.2 Growth Inducing Aspects

Growth inducing impacts refer to the likelihood that the Project may trigger further development by attracting significant increases in local population through the creation or relocation of employment and the support facilities that may be necessary to serve that population.

Implementation of the ROC Master Plan would result in the reuse of 480,000 GSF of vacant building space and the development of up to 400,000 GSF of new non-residential building space. The Project would not be expected to attract significant increases in local population, create or relocate significant employment, or improve the Project Area's public roads, sewers, water mains, or other utilities that would adversely impact the communities located in the adjacent neighborhoods.

The Project would be expected to result in a beneficial impact since it will expand the cultural and recreational resources in the Project Area and the City of Buffalo. The Project would also provide potential growth opportunities to the local economy, including an expanded municipal tax base; potential new visitor, employee, and business spending; and expand the development potential of the local area. Specifically, the proposed reuse of the vacant Buffalo State Hospital buildings, including dedicated arts/cultural/conference space, and rehabilitation of the Olmsted and Vaux design grounds would compliment and expand the adjacent cultural, commercial, and recreational land uses located near the ROC (e.g., Buffalo Olmsted Parkway System, Albright Knox Art Gallery, Elmwood Village). Short-term beneficial impacts would also occur during the estimated 20-year construction period. Short-term gains to the local economy would occur if local workers are hired and if local businesses provide services and supplies during the construction period.

7.3 Irreversible and Irretrievable Commitments of Resources

Irreversible commitments of resources are those that cannot be reversed except over an extremely long period of time. Short-term irreversible commitments of resources associated with the construction activities include the state funding already committed to stabilization activities, use of energy, and the generation of increased noise levels. Construction materials and building supplies would be

committed to the redevelopment of the Buffalo State Hospital, construction of new building space, reconfiguration of site circulation and parking areas, and rehabilitation of the ROC landscape. The use of these materials, such as gravel, concrete, steel, glass, etc., represents a long-term commitment of these resources that would not be available for other projects. Fuel, lubricants, and electricity would be required during construction activities for the operation of the various types of construction equipment and vehicles, and for the transportation of workers and materials to the construction sites. These resources are not in short supply, and their use would not have an adverse effect upon their continued availability.

In the long-term, implementation of the Project would result in irreversible or irretrievable commitments of resources if land development were to physically eliminate or diminish the character of natural resources on or immediately adjacent to the ROC. The disposition and reuse of a portion of the ROC property, although an irreversible action, does not represent an irretrievable commitment of land resources, since this action makes resources available for future reuses. The proposed action also represents the irretrievable commitment of human resources and materials requiring the use of fossil fuels, electrical energy, and other energy resources during construction and operation of facilities. These resources would be irretrievably committed to the action.

7.4 Effects on the Use and Conservation of Energy Resources

The construction and operation of the Project would have both short-term and long-term impacts on the use and conservation of energy resources. In the short-term, construction would require the use of nonrenewable energy resources including: gasoline, diesel fuel, and electricity. In addition to construction-related energy use by equipment including such things as forklifts, waste dumpers, excavators, loaders, backhoes, bulldozers, dump trucks, delivery vans, generators, concrete pumps, pile driving/caisson equipment, and paving equipment. The indirect use of energy would also occur as a result of construction workers commuting to and from the construction site.

Long-term impacts on the use and conservation of energy would result from traffic generated by the Project, consumption of energy from day-to-day Project operations, such as building heating, cooling, and lighting.

Specific conservation or sustainable development strategies are not identified in the ROC Master Plan. The plan expresses a commitment towards creating an environmentally sound ROC by utilizing sustainable design principles. The RCC is exploring and will implement sustainability practices and design principles for future redevelopment, construction, and building operations and maintenance to mitigate Project energy consumption.

7.5 Thresholds for Future Actions

Agencies may prepare a GEIS when there is a need to assess a wide variety of impacts at a more conceptual level on a larger geographic area, often including cumulative impacts, rather than project-specific or site-specific EISs. By addressing cumulative impacts and adopting mitigation measures and thresholds for future development and actions upfront, the use of a GEIS at the planning stage can establish a framework that fully addresses potential environmental impacts and substantially reduces SEQRA documentation requirements as new construction actually comes on-line.

The Project is based upon a conceptual development plan involving both well-defined elements (e.g., Core Project phase – visitor center, architecture center, 96 room hotel, event/conference space) and certain less-defined components (e.g., Expanded Core phase, Reuse of All Historically Significant Buildings phase, Development Landholding phase, and parking and landscaping plans) that would be designed and developed in the future. The FGEIS has evaluated site specific impacts associated with the well defined elements of the Project and cumulative, secondary long-term impacts associated with the less defined Project components.

As Project plans move forward, Project changes may occur as the conceptual development plan is developed into final design proposals for the well defined elements, but more likely, for the less defined components. Such changes may specifically include proposed changes to the contemplated development program including increases or decreases in total Project square footages devoted to a specific use (i.e., commercial). The following outlines the conditions or criteria and procedures to be followed in evaluating future project plans pursuant to SEQRA.

7.5.1 Procedures

Final designs for less-defined Project components as well as any proposed changes to the better defined elements will require further evaluation pursuant to SEQRA. ESDC, as Lead Agency, will be responsible for making a determination on the environmental review in relation to (i) the Final GEIS and (ii) the Final Findings Statement that will be issued for the Project. In turn, any involved agency (e.g., City of Buffalo) must issue its own findings based upon the FGEIS, prior to funding, undertaking, or approving a component of the Project within their jurisdiction (e.g., zoning). If any future changes to the ROC Master Plan are made, the applicable agency must determine if the environmental impacts associated with such changes have been adequately addressed in the FGEIS and SEQRA Findings Statement(s), taking into account whether the proposal exceeds any of the thresholds outlined below. Such a determination must be made before any future Project plans or changes are approved.

In the event that ESDC (or the applicable involved agency) determines that:

1. The future project plans or changes would be carried out in conformance with the conditions and thresholds established below, then no further SEQRA compliance would be required;
2. The future project plans or changes would be carried out in conformance with the conditions and thresholds established, but are not addressed or are not adequately addressed in the Findings Statement for the FGEIS, then an amended findings statement must be prepared;
3. The future project plans or changes are not addressed or are not adequately addressed in the FGEIS for the Project, but the proposal does not exceed any of the thresholds established below, or the proposal does exceed a threshold(s) established below, but would not result in any significant adverse environmental impacts, then a negative declaration must be prepared; or,
4. The future project plans or changes are not addressed or are not adequately addressed in the FGEIS for the Project and/or the proposal would exceed one of the thresholds established below and may have one or more significant adverse environmental impacts, then a supplement to the FGEIS must be prepared.

It should be noted that, pursuant to SEQRA regulations governing generic environmental impact statements, the issuance of a conditioned negative declaration by an involved agency is not authorized.

7.5.2 Thresholds

Future project plans or changes which exceed any one of the following conditions or thresholds shall not be considered to have been addressed by this FGEIS and must be evaluated by ESDC or the applicable involved agency to determine whether additional environmental review (i.e., Supplemental Generic Environmental Impact Statement) will be necessary:

- Project programming changes establishing development patterns exceeding the upper limits defined by the ROC Master Plan (e.g., square footages by use, increases in hotel rooms and/or increases in number of parking spaces);
- Introduction of land uses into the ROC that are significantly dissimilar to those identified in Project programming and assessed in this FGEIS;
- Introduction of significant changes to the conceptual vehicle and pedestrian circulation system or parking proposed in the ROC Master Plan;
- Accelerated construction schedules requiring 24/7 and/or weekend construction;

7. Other Considerations

- Street network modifications that would permanently reduce lane capacity within the Project Area;
- Modifications to Project programming that would increase impervious surfaces and the potential for stormwater runoff;
- Project programming that would directly impact architectural and archaeological resources listed on the S/NRHP that cannot be adequately mitigated; and
- Discovery of significant archaeological artifacts during ground disturbing activities associated with constructions activities proposed under the Development Landholding phase.

8 Summary of Mitigation Measures

The following mitigation measures would be implemented to in response to identified adverse impacts.

Table 8.1 Mitigation Measures

Resource	Mitigation Measures
Cultural/Historic Resources	▪ Redevelop ROC in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, and the RCC's *Historic Structures Report*, and the *Cultural Landscape Report*. ▪ ESDC to execute a Letter of Resolution (LOR) with OPRHP that would require RCC to continue to undertake various consultation, investigation, and stakeholder involvement efforts as components of the Core Project move toward final design/implementation. ▪ In accordance with LOR, establish a historic stakeholder committee to assist in subsequent reviews/consultations. ▪ In accordance with the LOR with OPRHP, undertake Phase 1B archaeology studies, as necessary. ▪ Secure required rezoning and site plan review approvals from the City of Buffalo. ▪ Prepare supplement environmental assessments, as necessary.
Site Parking	▪ Assess potential parking impacts following development of a site parking plan. ▪ Prepare a parking management plan in consultation with BSC, BPC, and adjacent neighborhoods. ▪ Coordinate with BPC and OMH to address the need for replacement parking for South lawn parking that is being discontinued as an ongoing process.
Community Cohesion	▪ Consult with BSC, BPC, Burchfield Penney Art Center and other stakeholders so that future activities and operations do not conflict with short- and long-term needs of adjacent land owners. ▪ Consult with the BPC and OMH regarding the identification of an acceptable replacement facility location, funding, and other considerations for relocation of the maintenance facilities.

8. Summary of Mitigation Measures

Table 8.1 Mitigation Measures (continued)

Resource	Mitigation Measures
Traffic	▪ Incorporate a southbound advance signal phase into the intersection of Elmwood Avenue with Iroquois. ▪ Revise the signal phasing timing at the intersection of Elmwood Avenue with Forest Avenue to provide additional green time for the Elmwood Avenue signal phases. ▪ Incorporate an eastbound advance left turn signal phase into the intersection of Elmwood Avenue with Rockwell Road. ▪ Monitor the operation and use of the proposed East/West Address Road following construction to identify and address any unforeseen traffic impacts.
Environmental Concerns	▪ Comply with applicable federal, state, and local regulations pertaining to the removal and disposal of waste materials.
Utilities	▪ Coordinate with BPC/OMH prior to undertaking utility work to understand nature of and duration of any potential utility disruption ▪ Consult with OPRHP prior to undertaking ground disturbing activities for the installation of new below grade utility infrastructure. ▪ Consult with the City of Buffalo and BSA pertaining to potential impacts associated with water and sewer demand prior to construction. ▪ Obtain required county and city approvals, as required. ▪ Prepare a Stormwater Pollution Prevention Program (SWPPP) for site development activities. ▪ Implement Best Management Practices (BMPs) for managing stormwater on-site.
Construction Activities	▪ Implement Best Management Practices to control noise during construction. ▪ Consult with BSC, BPC, OMH, Burchfield Penney Art Center, and other parties in the neighboring community regarding mitigation measures prior to the start of any construction activities. ▪ Comply with the City of Buffalo, City Charter Chapter 293, Noise Ordinance. ▪ Prepare an assessment of short-term parking displacement likely to result from construction activities prior to work. ▪ Restrict site access during construction to protect public health and safety. ▪ Comply with OSHA and New York State laws and regulations. ▪ Establish a working committee with the BPC and OMH to discuss access and operational issues during construction. ▪ Incorporate avoidance measures in construction documents prior to their release for bid. ▪ Designate a point of contact to coordinate and respond to specific concerns during project construction and future operations. ▪ Enter into a Memorandum of Understanding (MOU) or similar formal instrument.