

**State Environmental Quality Review  
NEGATIVE DECLARATION  
Notice of Determination of Non-Significance**

**Lead Agency:** North Collins Central School District

**Dated:** March 22, 2022

This notice is issued pursuant to Part 617 of the implementing regulations pertaining to Article 8 (State Environmental Quality Review Act) of the Environmental Conservation Law. A coordinated review of the proposed Capital Improvements Project, 2022 has been undertaken, and it has been determined that the proposed project will not have a significant adverse environmental impact and that a Draft Environmental Impact Statement will not be prepared.

**Name of Action:**

North Collins Central School District Capital Improvements Project, 2022

**Location of Action:**

North Collins Jr./Sr. High School  
2045 School Street  
North Collins, NY 14111

North Collins Elementary School and Bus Garage  
10469 Bantle Road  
North Collins, NY 14111

Both sites are in Erie County.

**SEQR Status:** Type I

**Description of Action:**

North Collins Central School District (“District”) proposes to undertake Capital Improvements Project, 2022, which includes various renovations and upgrades at the District’s buildings and sites including the Jr./Sr. High School, Elementary School, and Bus Garage.

Proposed building additions and renovations include Jr./Sr. High School gymnasium entrance and lobby addition and renovations and multipurpose room renovations in the Jr./Sr. High School library. Other Jr./Sr. High School interior upgrades may include lockers; potable water testing and possible pipe upgrades; vinyl flooring in corridor, and miscellaneous electrical and HVAC upgrades. Improvements at the Elementary School may include secure main entrance vestibule, storage cubbies in selective classrooms; water bottle filling stations; art room sinks; and upgraded technology fiber. Proposed building envelope upgrades include selective roof, windows, and doors at the Jr./Sr. High School and selective roof and soffits and corridor windows at the Elementary School. Asbestos abatement will be undertaken as required.

Site work proposed includes new turf and infill for existing synthetic turf field, new backstop netting system, and field lighting at the Jr./Sr. High School campus. Back-up electrical generators at the Jr./Sr. High School, Elementary School, and Transportation Office; new septic tank filter at the Bus Garage; and new digital signs at both campuses may also be included.

If the budget allows after receiving construction bids or if other items are identified, additional similar renovations, upgrades, and improvements could be undertaken at the Jr./Sr. High School such as updated restrooms and kitchen equipment and serving line; carpeting in auditorium, library, chorus, and band rooms; and masonry work. Other possible alternate work may include upgrades at the Elementary School such as corridor ceiling tile and outdoor basketball court upgrades, reconstructed sidewalks, steps, and ramps and outdoor learning / community areas at both campuses.

**Reasons Supporting this Determination:**

Potential environmental impacts associated with the project were identified in the Environmental Assessment Form to assess potential adverse environmental impacts and compared to the criteria for determining significance identified in 6 NYCRR § 617.7(c)(1) and in accordance with 6 NYCRR § 617.7(c)(2) and (3). As indicated below in the discussion of each criterion specified in 6 NYCRR § 617.7(c)(1), the proposed project will not have a significant adverse impact on the environment.

**(i) a substantial adverse change in existing air quality, ground or surface water quality or quantity, traffic or noise levels; a substantial increase in solid waste production; a substantial increase in potential for erosion, flooding, leaching or drainage problems;**

Proposed project sites are school campuses. Approximately five acres will be disturbed on developed portions of the campuses, with only a small additional area of impervious surfaces consisting mainly of a gymnasium entrance / lobby building addition at the Jr./Sr. High School.

According to New York State Department of Environmental Conservation's ("NYSDEC") databases, a creek is mapped on or adjacent to the Jr./Sr. High School campus. However, no creek there, and neither the District, nor the Village which was consulted, know anything about a creek ever being located where it is depicted on the database maps. Perhaps the databases are referring to outdated information. Also according to the NYSDEC EAF Mapper database, wetlands may be located near that campus, but the NYSDEC Environmental Resource Mapper indicates that the campuses do not contain or adjoin any mapped wetlands. Site work will occur in developed areas, including the location of the existing synthetic turf athletic field where the existing underdrainage system will be kept in place, and will not impact a water body or wetlands. Site work will be undertaken in accordance with the NYSDEC SPDES General Permit for Storm Water Discharges from Construction Activity ("Storm Water General Permit") and development and implementation of a Storm Water Pollution Prevention Plan ("SWPPP"). This will include erosion and sediment controls and best management practices regarding construction and post-construction storm water management controls which will be provided in accordance with appropriate storm water management design standards including the NYSDEC Storm Water Management Design Manual. Post-construction storm water management

measures will remain similar to existing measures utilized, including tying into existing storm water management systems including the existing underdrainage system for the synthetic turf field at the Jr./Sr. High School. Topsoil and/or subsoil disturbed during site work will be segregated and reused on-site to the extent possible. If necessary, excess materials will be removed from the site for use as fill or topsoil off-site in accordance with NYSDEC regulations or other applicable requirements. The proposed project will not create a substantial adverse change in existing ground or surface water quality or quantity, and will not increase the potential for erosion, leaching, drainage or flooding problems on or adjacent to the campuses.

The proposed capital project will not create a substantial adverse change in existing air quality, noise or odor levels, or traffic during construction. Air quality, noise, and odor impacts from construction will be minimal and temporary, consistent with typical site work and building construction activities including temporary traffic associated with construction workers, removal of construction and demolition debris and excavated pavement and possibly earth. Dust-suppression techniques including wetting ground surfaces and equipment as necessary, and other measures such as emission controls on construction equipment and work hour limits will be employed. The proposed project would be undertaken over an estimated 12-18 months. Work for this one capital project would be undertaken at multiple areas of the campuses at various times taking into account school schedules and construction efficiencies, and not all of the work would be undertaken at the same time. Construction and demolition debris, including worn synthetic turf and infill and excavated pavement, will be reused, recycled or disposed in accordance with applicable requirements. Also, waste such as asbestos-containing, mercury or lead materials will be removed and managed in accordance with applicable requirements.

Student and staff populations at the school sites will not change as a result of the project, and the project will not create a substantial adverse change in existing air quality, noise or odor levels, solid waste / refuse or sanitary wastewater generation, water usage, or traffic after construction is completed. Field lighting at the site of the existing Jr./Sr. High School athletic field will be used during limited time periods and directed downward to mitigate glare. There will not be significant adverse impacts.

**(ii) the removal or destruction of large quantities of vegetation or fauna; substantial interference with the movement of any resident or migratory fish or wildlife species; impacts on a significant habitat area; substantial adverse impacts on a threatened or endangered species of animal or plant, or the habitat of such a species; or other significant adverse impacts to natural resources;**

According to the NYSDEC EAF Mapper database, the campuses are not located in areas designated as a significant natural community or containing any species of plant or animal or habitat that is listed as endangered, threatened, rare, or of special concern. Proposed site work on the existing campuses will be located in areas that are already developed, and there will be only a small area of additional impervious surfaces.

The project will not remove or destroy large quantities of fauna or substantially interfere with the movement of resident or migratory fish or wildlife. The project will not have a substantial adverse impact on a threatened or endangered species of animals or plants, impact a

significant habitat area, or have other significant adverse impacts to natural resources. There will not be significant adverse impacts.

**(iii) the impairment of the environmental characteristics of a Critical Environmental Area as designated pursuant to subdivision 617.14(g) of this Part;**

The sites are not within or adjacent to a *Critical Environmental Area* as designated pursuant to 6 NYCRR § 617.14(g), and the proposed project will not impair the environmental characteristics of a *Critical Environmental Area*.

**(iv) the creation of a material conflict with a community's current plans or goals as officially approved or adopted;**

The proposed project will not create a conflict with the community's current plans or goals as officially approved or adopted. The sites have been developed school campuses for decades, and the renovations and upgrades will enhance them and the District's ability to serve the community.

**(v) the impairment of the character or quality of important historical, archeological, architectural, or aesthetic resources or of existing community or neighborhood character;**

According to the New York State Office of Parks, Recreation and Historic Preservation ("OPRHP" or State Historic Preservation Office or "SHPO") Cultural Resource Information System ("CRIS") database, the Jr./Sr. High School has been determined by SHPO in the past to be "eligible" for listing in the National or State Register of Historic Places (the "Register"), and the Elementary School and Bus Garage have been determined to be "not eligible" for listing in the Register. Also, according to the CRIS database, the Jr./Sr. High School is located within an area designated as archeologically sensitive, and the Elementary School and Bus Garage are not.

Some of the proposed work is exempt from SHPO review due to the nature of the work items as identified in the Memorandum of Understanding between SHPO and the State Education Department. However, in keeping with common practice, project information was submitted to SHPO for consultation/review regarding proposed building and site work at each campus. Regarding the Elementary School and Bus Garage, SHPO has determined that "it is the opinion of [SHPO] that no properties, including archaeological and/or historic resources, listed in or eligible for the [Register] will be impacted by this project." For the "eligible" Jr./Sr. High School, SHPO has requested more information including photographs and plans, particularly regarding window work and the proposed building addition (gymnasium entrance/lobby), but no archaeological concerns were expressed in the request for additional information.

If the project were to receive public approval, this additional information requested for the Jr./Sr. High School would be prepared and submitted to SHPO, and upgrades would be designed and constructed in keeping with accepted Secretary of the Interior's rehabilitation standards and SHPO's input. It is noted that a recent capital project also included similar window work which was undertaken in line with a SHPO consultation. Given that determination and the continued consultation with SHPO regarding proposed building improvements, there will not be a significant adverse impact to historical, archeological, architectural, or aesthetic

resources. Also, the proposed project, which will maintain and improve the school buildings and campuses, will not impair the character or quality of existing community or neighborhood character.

**(vi) a major change in the use of either the quantity or type of energy;**

There may be a minimal increase in demand for energy with the installation athletic field lighting at the Jr./Sr. High School campus. The proposed project to maintain and improve existing schools and campuses will not cause a major change in the quantity of electricity or natural gas to be used by the District, and the project will not affect the community's sources of fuel or energy supply. Temporary construction will require minor energy use and will be undertaken in accordance with existing energy codes and use more energy-efficient materials/equipment. Some improvements such as HVAC upgrades will promote energy efficiencies.

**(vii) the creation of a hazard to human health;**

A secure main entrance vestibule at the Elementary School is included in the proposed project. Other elements of the proposed project will maintain and upgrade the existing school buildings and campuses and will not create a hazard to human health. Hazardous materials, such as asbestos-containing, mercury, or lead materials encountered during renovations, will be handled and disposed in accordance with applicable rules and regulations. Reported spills identified in the NYSDEC database were closed many years ago by the NYSDEC, and the project will not impact or be impacted by the former spills.

The athletic field at the Jr./Sr. High School was converted from grass turf to synthetic turf about 15 years ago, using SBR / crumb rubber from recycled tires as infill granules placed within the synthetic turf carpet. SBR / crumb rubber has been commonly used as an infill component, typically with sand, in synthetic fields which have been installed at institutions throughout the world, including New York State. Other materials, including EPDM virgin rubber, alternatively have been used as an infill component. As discussed below, for several years, a question of whether SBR / crumb rubber poses a health risk has been raised, and studies and literature reviews have been performed to address this question as well as study injuries associated with synthetic turf fields.

Among the numerous studies of synthetic turf and SBR / crumb rubber is a 2009 NYSDEC / New York State Department of Health ("NYSDOH") report that reviewed other studies and did not find significant health risks with synthetic turf using SBR / crumb rubber as infill material, although it noted the potential for heat-related impacts and recommended precautions. Regarding groundwater, the potential for release of zinc and other compounds was noted, but due to attenuation and dilution, SBR / crumb rubber typically may be used without significant impact on groundwater quality, and aquatic toxicity is unlikely. Additional sampling of surface water and groundwater had been planned, but according to one of the primary authors of the NYSDEC/NYSDOH report after the report's publication, additional sampling and a supplemental report were no longer planned due to the conclusion in this and other studies indicating minimal concern. Regarding chemical releases to air from synthetic fields, the few analytes detected in low concentrations are commonly found in developed environments, and it

was concluded that measured levels of chemicals in the air at the fields sampled do not raise a concern for non-cancer or cancer health effects for people who use or visit the fields. Also, the study's findings did not indicate that these fields are a significant source of exposure to respirable particulate matter. Regarding heat associated with the fields, the temperature survey found little difference for the indicators of heat stress between synthetic turf, grass and sand surfaces. However, given that the synthetic turf surface temperatures were much higher, and prolonged contact with the hotter surfaces may have the potential to create discomfort, cause thermal injury, and contribute to heat-related illnesses, the study stated that awareness of the potential for heat illness and how to recognize and prevent heat illness should be raised among users and managers of athletic fields, athletic staff, coaches and parents.

An October 2010 study prepared by the California Office of Environmental Health Hazard Assessment for the California Department of Resources Recycling and Recovery concluded that synthetic turf fields containing recycled crumb rubber do not release significant amounts of volatile organic compounds or fine particulates and adverse health effects are unlikely to occur in persons using the turf fields. The study also found that fewer bacteria, including MRSA and Staphylococci, were detected on synthetic turf compared to natural turf which would tend to decrease the risk of skin infection in athletes using synthetic turf relative to athletes using natural turf. However, the rate of skin abrasions due to contact with synthetic turf was two- to three-fold higher for the college soccer players involved in the study competing on synthetic turf compared to natural turf, although the seriousness of abrasions was similar on the two surfaces. The study concluded that the effects on the skin infection rate for synthetic turf relative to natural turf could not be predicted from these data alone. However, it recommended that protective clothing and equipment should be considered, treating skin abrasions (clean, disinfect, cover abrasions as soon as possible and keep wounds clean and protected as they heal) should be given the next highest priority, and disinfecting synthetic turf fields should be the lowest priority since such efforts may have little effect given the lower numbers of bacteria detected in synthetic turf compared to natural turf. In addition, a number of studies concluded that there are no significant differences in the incidence or severity of injuries sustained on natural grass or synthetic turf (as noted by the NYSDEC/NYSDOH study), with one study finding no substantial differences in head, knee, or shoulder trauma between playing surfaces, and other studies reportedly suggesting that the incidence and/or severity of injuries may be less with synthetic fields. There are also reports of studies indicating a higher incidence of injury on synthetic turf, particularly some types of knee injuries during competition, although specific types and generations of synthetic turf fields may not have been specifically studied. It has been the District's experience that there has not been a significant difference in the type or severity of injuries experienced on synthetic turf compared with natural turf.

From the studies, the primary concern with synthetic turf fields reportedly is the potential for heat stress and dehydration. The District administers heat index procedures as recommended by the New York State Public High School Athletic Association in which "Hourly RealFeel Temperature" (Heat Index) is checked prior to contests/practices when it is hot. Depending on the Heat Index temperature, the procedures include providing ample water and multiple water breaks, monitoring athletes for heat illness, considering reducing the amount of time for the practice session or postponing practice, and wearing light weight and loose fitting clothing. If the Heat Index is 96 degrees or greater, the Heat Index procedures call for no outside activity,

practice, or contest to be held. In addition, coaches receive first aid training which includes heat exhaustion, and athletic trainers are present at practices and games. Also, as mentioned above, synthetic turf fields, especially fields which receive sunlight, reportedly do not provide a hospitable environment for microbial activity, and it does not appear that synthetic turf is a substantial source of MRSA infection. However, given that skin abrasions may be more common with synthetic turf than grass turf, the District emphasizes its cleaning procedures in locker and shower rooms and in its First Aid and healing procedures to minimize the risk of infection.

Based on information regarding various studies and reviews of synthetic turf using SBR / crumb rubber infill including NYSDEC and NYSDOH publications; the history and continuing practice of other schools' and municipalities' in New York State installing, replacing, and using synthetic turf fields with SBR / crumb rubber or other infill materials; and the New York State Education Department's continuing to approve and fund the installation and replacement of such fields; the replacement and use of the synthetic turf field with SBR / crumb rubber does not pose a significant impact to human health or the environment.

It is noted that in 2016, the United States Environmental Protection Agency ("EPA") announced that it would work with other federal agencies to study SBR / crumb rubber. Over the past few years, EPA and the other federal agencies completed sampling and drafted a two-part draft report addressing (i) tire crumb rubber characterization and (ii) human exposure to crumb rubber. The tire crumb rubber characterization part of the report was released in final in July 2019, and states "[i]n general, the findings from the report support the premise that while chemicals are present as expected in the tire crumb rubber, human exposure appears to be limited based on what is released into air or simulated biological fluids." A peer review identified weaknesses in the human exposure part of the study. Therefore, the federal agencies determined that a "more robust biomonitoring study" is needed to investigate potential exposure to constituents in tire crumb rubber. No certain timeline has been identified by the federal agencies regarding the continuation of the human exposure study, and the most recent update indicated that the initiation of the biomonitoring study has been postponed due to the COVID-19 outbreak. One of the federal agencies' status reports stressed that neither the tire crumb rubber characterization part of the report nor the combined two-part report when the continued human exposure part of the report is completed in the future will constitute a formal risk assessment. However, if the federal agencies' eventual conclusions were to differ from the NYSDEC / NYSDOH report regarding SBR / crumb rubber, the District would consider that information when making a determination of the type of infill to be used.

**(viii) a substantial change in the use, or intensity of use, of land including agricultural, open space or recreational resources, or in its capacity to support existing uses;**

The school campuses have existed for many years, and the proposed project will maintain and upgrade them, with only small additional building areas such as a gymnasium entrance and lobby addition to the Jr./Sr. High School and possibly outdoor learning / community areas at each campus. The continued use of the school campuses will not cause a substantial change in use or intensity of use of the sites or constitute a substantial change in the capacity to support existing use.

According to the NYSDEC EAF Mapper, the campuses are not within agricultural districts. According to the U.S. Department of Agriculture Natural Resource Conservation Service soils database, the campuses have mapped soils classified as agricultural type soils. However, the sites have been developed school campuses for decades and are not agricultural land. There will not be adverse impacts to open space or agricultural resources. Some of the proposed improvements will upgrade outdoor recreational / athletic resources at the campuses, including upgrading the synthetic turf field with new synthetic turf carpet and infill, new backstop netting system, and field lighting at the Jr./Sr. High School and possibly the outdoor basketball court at the Elementary School.

**(ix) the encouraging or attracting of a large number of people to a place or places for more than a few days, compared to the number of people who would come to such place absent the action;**

The proposed project consists of renovations and upgrades at the District's existing schools and campuses. Construction activity including the presence of construction workers will be temporary. The project will not increase the student and staff populations, or encourage or attract large numbers of visitors to the sites who already come to the campuses. The improvements will not create significant adverse impacts.

**(x) the creation of a material demand for other actions that would result in one of the above consequences;**

The proposed renovations and upgrades to District buildings and facilities at the existing campuses will not create a material demand for other actions that would result in one of the above consequences.

**(xi) changes in two or more elements of the environment, no one of which has a significant impact on the environment, but when considered together result in a substantial adverse impact on the environment; or**

The project will not result in changes in two or more elements of the environment which, when considered together, would result in a substantial adverse impact on the environment.

**(xii) two or more related actions undertaken, funded or approved by an agency, none of which has or would have a significant impact on the environment, but when considered cumulatively would meet one or more of the criteria in this subdivision.**

The proposed project has been reviewed as one action. All of the elements of the proposed project at the campuses have been reviewed together and do not meet any of the above criteria.



**For Further Information:**

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