

# **Final Generic Environmental Impact Statement**

## **Gates Circle Redevelopment**

Lead Agency:  
**City of Buffalo Planning Board**  
901 City Hall  
Buffalo, New York, 14202  
Nadine Marrero, Director of Planning  
City of Buffalo Office of Strategic Planning

Project Sponsor:  
**TM Montante Development LLC**  
Suite 101  
2760 Kenmore Ave  
Tonawanda New York 14150

**and**

**Gates Circle Holdings LLC**  
Suite 101  
2760 Kenmore Ave  
Tonawanda New York 14150

*Prepared by:*  
City of Buffalo  
Planning Board

*With supporting information provided by:*  
**C&S Engineers, Inc.**  
141 Elm Street Suite 100  
Buffalo, New York 14203

October 2015

Date of DGEIS Acceptance by Lead Agency:  
Public Comment Period:

May 19, 2015  
May 26, 2015 to July 6, 2015;  
August 20 to September 19, 2015

Date of Public Hearings:

June 16, 2015;  
September 8, 2015

Date of FGEIS Acceptance by Lead Agency

October 19, 2015

**TABLE OF CONTENTS**

1.0 Introduction..... 1  
1.1 Purpose and Intent of FGEIS ..... 1  
1.2 SEQRA Review Process ..... 2  
2.0 Project Summary as revised..... 3  
2.1 Project Description..... 3  
2.2 Purpose and Need..... 4  
2.3 Project Changes since DGEIS..... 5  
2.4 Summary of Adverse Impacts ..... 10  
3.0 Revisions..... 17  
3.1 Revision to Text ..... 17  
3.2 Revisions to Figures ..... 18  
Summary of comments and responses ..... 19

**FIGURES**

Figure 1-2..... Proposed Site Plan  
Figure 1-3..... Current Buildings On-Site  
Figure 1-5..... Proposed 3D Site Plan  
Figure 1-6..... Existing 3D Site Plan  
Figure 2-2..... Zoning  
Figure 2-2B ..... Revised TM Montante Proposed Green Code Zoning for Site  
Figure 2-2C ..... Draft Green Code Zoning

**APPENDICES**

Appendix A Written Public Comments  
Appendix B Transcript of DGEIS Hearings  
Appendix C Lancaster Extension Cross Section  
Appendix D Summary of Existing and Proposed Buildings

## **INTRODUCTION**

### **1.1 Purpose and Intent of FGEIS**

This Final Generic Environmental Impact Statement (“FGEIS”) has been prepared by the City of Buffalo Planning Board (“Planning Board”), acting as Lead Agency, pursuant to the State Environmental Quality Review Act (“SEQRA”), Article 8 of the New York State Environmental Conservation Law and its implementing regulations (6 NYCRR Part 617). This FGEIS has been prepared for the proposed Gates Circle Redevelopment Project (“Project”) to be located at 3 Gates Circle and the City-owned parking ramp at 1277 Delaware Avenue in the City of Buffalo (collectively the “Site”). The Project Sponsors, are TM Montante Development LLC (“TM Montante”) and Gates Circle Holdings LLC (collectively, “the Project Sponsor”). This FGEIS was prepared by the Planning Board to address revisions to the Draft Generic Environmental Impact Statement (“DGEIS”); to discuss substantive public and agency comments on the DGEIS received during the public/agency comment period; and to provide the Lead Agency’s responses to those comments. Completion of the FGEIS will allow the Planning Board to make its final determinations regarding the potential environmental impacts of the Project.

Section 2 of this FGEIS presents a summary description of the Project and of the DGEIS including the discussions of impacts, mitigation and alternatives. The general purpose of the DGEIS was to:

- Identify and evaluate the potential environmental impacts that may result from developing the Project;
- To propose reasonable mitigation measures to reduce the effects of significant adverse impact; and
- To evaluate alternatives to the Project.

Section 2 will also describe whether substantial changes to the Project have been introduced since the DGEIS was accepted on May 19, 2015.

*City of Buffalo Planning Board*

Section 3 of this FGEIS presents any changes to the original text and figures. These changes would include Project changes.

Section 4 is the summary of all comments received by the Lead Agency during the public comment period and the Planning Board responses.

**1.2 SEQRA Review Process**

On April 23, 2014, the Planning Board received a Subdivision Application and a Full Environmental Assessment Form prepared by the Project Sponsor. The Planning Board determined, pursuant to 6 NYCRR § 617.4(b)(9), that the Project was a Type 1 Action under SEQRA.

On May 14, 2014, the Planning Board circulated a Notice of Intent to other Involved Agencies and Interested Agencies stating its intent to act as Lead Agency. Since no objections were raised, the Planning Board was established as SEQRA Lead Agency for the Project on June 17, 2014.

On June 17, 2014, pursuant to 6 NYCRR § 617.7, the Planning Board issued a Positive Declaration, determining that the construction and operation of the Project may have an adverse impact on the environment and that this GEIS must be prepared.

There have been two public comment periods related to the Project. The first public comment period began on May 26, 2015 and was open until July 6, 2015. A public hearing was held during this first public comment period on June 16, 2015. The second public comment period began on August 20, 2015 and was open until September 19, 2015. A public hearing was held during this second public comment period on September 8, 2015.

**PROJECT SUMMARY AS REVISED**

**1.3 Project Description**

In March of 2012, as part of a regional plan mandated by New York State, Kaleida Health (“Kaleida”) closed Millard Fillmore Gates Circle Hospital (“MFG”). The closing left 882,000 square feet (“sq ft”) of unoccupied hospital space on approximately 6.7 acres of land at 3 Gates Circle in the City of Buffalo.

As part of the planned closing, Kaleida undertook a deliberative process to ensure that the facility and/or the land was returned to viable use after the hospital was vacated. As part of that process, Kaleida engaged the Urban Land Institute (“ULI”) in 2011 to study the facility and develop a reuse concept. The outcome of that effort was an evaluation of development options and a land use plan for the Site.

Kaleida ultimately decided that the best way to facilitate reuse of the existing structures was to issue a Request for Proposals (“RFP”) for site redevelopment. The RFP was released in 2012, but the original selected developer was not able to complete the transaction. Kaleida reissued the RFP in July 2013, and TM Montante was selected as the designated developer. On December 31, 2013, TM Montante, through Gates Circle Holdings LLC completed the transaction and took ownership of the Site.

The Project is a phased redevelopment with a potential build out of five to ten years based on market demand. The phased build out of the Project will include a Continuing Care Retirement Community called Canterbury Woods at Gates Circle (“Canterbury Woods”), operated by Episcopal Church Home and Affiliates, Inc. This facility will face Gates Circle. The remainder of the Site will be redeveloped with a mix of uses, including residential rental units, for-sale townhomes and condominiums, office space, retail space, a market, and a health and wellness center.

A new street, aligned with Lancaster Avenue, which currently ends at Delaware Avenue, will be extended eastward through the Site and connect to Linwood Avenue (“Lancaster

*City of Buffalo Planning Board*

Extension”). A north-south connector road will also be constructed from the Lancaster Extension north to Lafayette Avenue (“Lafayette Connector”).

**1.4 Purpose and Need**

The Site is located on Gates Circle between Delaware Avenue and Linwood Avenue in the City of Buffalo. The surrounding area is predominately residential with supporting neighborhood commercial uses.

The March 2012 closing of MFG left an approximately seven-acre parcel with 900,000 square feet of vacant building space at the Site. The Planning Board recognizes that one of the goals of the proposed Project is to prevent large-scale blight from an abandoned property adjacent to Gates Circle and a historic neighborhood.

The City of Buffalo has seen increasing amounts of investment over the last decade. There is also a nationwide trend toward urban living and appreciation for walkable urban communities. The Project area is increasingly desirable due to its intact urban fabric, vibrant commercial districts and proximity to high-quality public space. The intact urban fabric is also a development challenge, since it means there are few large, buildable lots in the area.

As a national and local trend, seniors want to continue residing in urban neighborhoods, or, if they have left, to move back into cities. However, the large house sizes common near the Site are not ideal for a senior occupied household. This presents an opportunity to both meet a demand and to help the City retain residents.

Future development of the Site must also acknowledge the importance of Gates Circle and the residential communities surrounding the Project and add to the vitality of the community.

### **1.5 Project Changes since DGEIS**

There have been no substantive changes to the Project since the publishing of the DGEIS on May 19, 2015. However, the following items outside of the proposed Project design have changed since the May 19, 2015 publishing of the DGEIS:

The original alternatives analysis assess the potential impacts of the scenario of reusing all buildings on Site. Since the publishing date, three buildings: the Power House, Building A and Building B have been demolished following City of Buffalo environmental review and issuance of permits. The results of the Alternatives Analysis remains unchanged however, as the Reuse of Buildings Alternative would not decrease adverse impacts and would create additional adverse impacts. Note that currently, the Project assumes a maximum-impact scenario of demolition of all existing buildings at the Site. The three scenarios evaluated as part of the DGEIS (the proposed Project and the two other alternatives) were determined to provide the greatest range of possible impacts for the site re-development.

The Project sponsor has withdrawn a pending rezoning application with the Common Council. However, there is potential that the application may be re-submitted during future development of the Site.

The Planning Board notes that regardless of the current or future zoning of the Site or the regulatory mechanism in which the Project can be approved in the future, the Board is reviewing the Project as proposed in the DGEIS and described in this FGEIS in Section 2.1 and below. This FGEIS provides mitigation through criteria and thresholds for the Project as proposed, which will be incorporated into the Statement of Findings for the Project. Future site plans that will be submitted to the Board for review will need to show concurrence with the Statement of Findings or additional SEQRA review will be required.

## **Phasing**

The redevelopment of the Site will be completed in three general phases.

- Phase 1 – Site Remediation and Clearing
- Phase 2 – Construction of Infrastructure and Canterbury Woods Building
- Phase 3 – Additional Clearing and Construction

## **Proposed Structures and Infrastructure**

### **Building One: Canterbury Woods at Gates Circle:**

As part of Phase 2, a new structure for Canterbury Woods would be constructed along Gates Circle, generally in the current location of the Main Hospital Building. Canterbury Woods will be operated as a Continuing Care Retirement Community (CCRC), for residents age 62 and up. The community will consist of

- 53 independent living apartments and a five-unit Assisted Living Center.
- Six-floor facility, with unit floor plans ranging from 800 to 2,000 square feet (sq ft).
- The building will be up to 125,000 sq ft in total. Parking will be provided below the building in an underground garage. This includes some at grade parking.

### **Building Two: Mixed-Use Building at SE corner of Delaware Avenue and Lancaster Extension:**

- An approximately 302,000 sq ft mixed-use building up to ten stories, but the portion closest to Delaware Avenue will be no more than six stories in height.
- The building will be designed as a mixed-use facility, with a health and wellness center up to 50,000 sq ft, a market up to 25,000 sq ft, and additional retail space up to 5,900 sq ft, for a total of 80,900 sq ft occupying the first two stories.
- The remaining floors will consist of a mix of 58,700 sq ft of office and 162,400 sq ft of residential, and may accommodate up to 152 total residential units.

**Building Three: Mixed-Use Building at SW corner of Linwood Avenue and Lancaster**

**Extension:**

- An approximately 133,500 sq ft mixed-use building with up to 48 total residential units.
- Up to six stories is proposed. The portion of the building along Linwood Avenue will only be three-and-a-half stories high, keeping with the residential fabric along Linwood.
- The building will contain a mix of retail, office and residential uses;
  - The first floor of the building will be comprised of approximately 13,500 sq ft of retail, approximately 10,800 sq ft of office space and approximately 2,700 sq ft of residential space and common area space.
  - The upper five floors will consist of a mix of approximately 58,600 sq ft of office space and 47,900 sq ft of residential space.

**Building Four: Mixed-Use Building at NE corner of Delaware Avenue and Lancaster**

**Extension:**

- An approximately 70,200 sq ft mixed-use building consisting of up to 27 residential units and up to seven stories.
- The first floor will be approximately 12,100 sq ft of retail, and the upper stories will contain a mix of approximately 29,050 sq ft of office space and 29,050 sq ft of residential space.

**Building Five: Mixed-Use Building at the Center of the Site:**

- An approximately 143,500 sq ft mixed-use building up to 110 total residential units and ten stories on the northeast side of the intersection of the Lafayette Connector and Lancaster Extension.
- The taller portion of the building will be set back from Linwood toward the center of the Site. The building will contain a mix of retail, commercial and residential uses.

*City of Buffalo Planning Board*

- Retail uses will occupy the first floor, with approximately 18,000 sq ft. The upper floors will consist of a mix of approximately 8,700 sq ft of commercial space and 116,800 sq ft of residential space.

**Building Six: Mixed-Use Building on Lafayette Avenue and Lafayette Connector**

**Road:**

- An approximately 73,200 sq ft mixed-use building up to seven stories is planned along the Lafayette Connector directly across from Canterbury Woods.
- Approximately 60,900 sq ft of residential space, and may accommodate up to 60 total units.
- The building will contain a mix of retail and residential uses. Approximately 9,200 sq ft of retail space will occupy much of the first floor. The balance of the first story will be approximately 3,100 sq ft of residential space.
- The taller portion of the building will be set back from Lafayette toward the south into the center of the Site.

**Building Seven: Residential Building at SW corner of Lafayette and Linwood:**

- An approximately 56,000 sq ft residential building with six stories and up to 53 residential units.
- The taller portion of the building will be stepped back from the street toward the center of the Site, with the section closest to Linwood Avenue rising no more than three-and-a-half stories.

**Building Eight: Mixed-Use Building at NW corner of Lancaster and Linwood:**

- An approximately 32,100 sq ft mixed-use building with up to 28 residential units and three-and-a-half stories.
- The building will have approximately 2,700 sq ft of retail on the first floor. The remainder of the building will consist entirely of residential space.

### Total Build-Out

In all, the Site will have approximately:

- 936,000 sq ft of building space divided approximately as follows:
  - 633,000 sq ft of which will consist of up to 531 residential units.
  - 166,000 sq ft of office space, and
  - 136,000 sq ft of retail, which includes a 25,000 sq ft urban market and a 50,000 sq ft health and wellness space.

### **New Streets**

Lancaster Avenue currently terminates at a signalized intersection at Delaware Avenue, across from a driveway that was used to access the hospital property. As part of the Project, the Lancaster Extension will be constructed through the Site from Delaware Avenue to Linwood Avenue. A north-south connector road, the Lafayette Connector, will also be constructed between the Lancaster Extension and Lafayette Avenue. These extensions are designed with an angle to discourage cut through traffic on residential streets.

The current driveway curb cut at the hospital entrance on Delaware will be used as the starting point for the Lancaster Extension road. The existing driveway curb will require some modifications along with the curb to the hospital entrance on Linwood. No additional curb cuts will be required for the Lancaster Extension. The Lafayette Connector road will require a curb cut at Lafayette.

The new roads are proposed as two-way streets with one travel lane in each direction. On-street parking will be provided between bump-outs and each street will feature landscaping and appropriate light posts. In addition, pedestrian accommodations will be provided to ensure that adequate access and connectivity is available to existing and future land uses.

### **Greenspace and Stormwater Infiltration Areas**

Much of the interior space of the 3 Gates Circle parcel will be dedicated to greenspace. This will be both an amenity for the community and a way to reduce the amount of

*City of Buffalo Planning Board*

stormwater that enters the sewer system from the Site. The Project provides 1.75 acres of greenspace—a significant increase from the approximately 0.85 acres of existing greenspace. This greenspace will be designed as an amenity for residents but will be available for use by the community.

**Parking**

Parking will be provided in several locations on the Site. The Canterbury Woods facility will provide approximately 43 parking spaces for residents below the structure and eight parking spaces at grade, allowing for direct access into the building.

There are approximately 800 parking spaces at the existing parking ramp. The Project Sponsor is working with the City of Buffalo to negotiate a use or purchase agreement for this structure. The Lancaster Extension and Lafayette Connector will also create up to 35 on-street parking spaces within the proposed development boundaries.

Other parking spaces may be integrated into the first floor or basement of buildings that are not yet designed. However, these parking spaces will not be included as part of the parking assessment for the Project.

**1.6 Summary of Adverse Impacts**Summary of Adverse Impacts*Land Use and Zoning*

The Project Sponsor previously petitioned the City of Buffalo to rezone the Site to the C1 Neighborhood Business District. The parking lot to the east of the Site as well as properties that front on Delaware Avenue to the north are already zoned C1.

The Project does not involve any uses not allowed in the C1 zoning district, including residential and retail uses, a health and wellness center and commercial offices. These uses are consistent with those that surround the Site on Lafayette and Delaware Avenues and complement uses on Linwood Avenue. As a whole, the proposed land uses are less intensive than the previous 24-hour hospital use.

*City of Buffalo Planning Board*

A height variance would be required to construct certain buildings as proposed within the C1 zone. A variance for signage may also be required, though signage has not yet been developed for the Project.

*Utilities and Energy Use*

The Site's past hospital use required significant utility connections, so sufficient infrastructure already exists. The utilities that currently serve the Site include water, sewer, electric, gas and fiber optic.

The Project will increase the amount of greenspace at the Site. The roughly 0.85 acres of existing greenspace will increase to approximately 1.75 acres, and will help to reduce stormwater runoff. In the event the increase in greenspace does not provide the required stormwater detention, other mitigation measures such as engineered underground stormwater detention systems will be installed under the central greenspace and other areas throughout the 6.7 acre Site, as required. Specific stormwater detention systems will be designed during site plan phase. The detention systems will achieve and sustain compliance with NYSDEC and City of Buffalo stormwater regulations. They will be modeled to meet the 2.5, 10, 25 and 100 year storm events.

*Historic, Archaeological and Cultural Resources*

While some of the buildings on the Site are more than 50 years old, the State Historic Preservation Office (SHPO) has determined that individually they are not eligible for the National Register of Historic Places (NRHP). Because the structures have been significantly altered over time, their eligibility for the NRHP is severely limited. The Proposed Site Plan shows all of the existing buildings being cleared from the Site, as a maximum impact scenario.

Encountering archaeological resources is extremely unlikely. The Site was previously disturbed by urban development for over 130 years including during construction of the existing structures.

*Visual and Aesthetic Resources*

The Project is consistent with the current massing in terms of total square footage and heights, which has been in place for more than 30 years. However, because the proposed building layout is more evenly distributed, the Project will visually- and physically- open up the Site. It will also more than double the amount of existing green space, and soften the current visual impact along Gates Circle, Lafayette Avenue, and Linwood Avenue.

The Canterbury Woods building will improve the visual environment along Gates Circle when compared to the existing structure by reducing height, adding entrances and presenting a varied façade. The mixed-use building at the southeast corner of Delaware Avenue and the Lancaster Extension will replace an unattractive parking lot. It will be no taller than existing buildings on the Site. Although these are changes to the built and visual environment, they are consistent in scale with other buildings on Delaware Avenue and they are not adverse impacts. The construction of other buildings at the Site could change the visual setting.

*Topography, Geology and Soil*

No significant adverse impacts were identified.

*Socioeconomic (Including Environmental Justice)*

No significant adverse impacts were identified. No Environmental Justice populations are adjacent to the Site.

*Access, Transportation and Parking*

In total, the Site is estimated to generate 569 AM Peak trips and 776 PM Peak trips. While this level of traffic is lower than what would have been associated with the previous hospital use, the Level of Service (LOS) at several surrounding intersections would be adversely impacted at full-build out of the Site. These impacts can be mitigated through the implementation of modifications to the existing signal timing at the following intersections:

- Delaware Ave and West Delevan
- Delaware Ave and Lancaster Ave
- Delaware Avenue and West Ferry Street
- Linwood Avenue and West Ferry Street

Based on the ITE Manual, the Site will require 1,222 parking spaces. There are currently 1,241 parking spaces on or adjacent to the Site, four of which will be removed during build out. This will result in a total of 1,237 parking spaces—more than the anticipated demand.

#### *Air Quality*

No significant adverse impacts were identified. There will be minor impacts to air quality during the demolition of the existing structures, which will be mitigated with water cannons and other dust control measures.

#### *Solid Waste*

During the demolition phase, 69,000 tons of waste will be generated. At full build-out, it is estimated that the Site will generate up to 85 tons of waste per month.

#### *Public Services*

No significant adverse impacts were identified.

#### *Construction*

The Project Sponsor demolished the Main Hospital Building, Building A, by implosion on October 3, 2015. Implosion required a demolition permit from the City of Buffalo, an asbestos survey, removal of all glass windows, and surveys of surrounding properties and infrastructure.

Any other buildings on-site will be demolished by traditional mechanical methods. Building B was demolished using mechanical methods as well as the Power Plant (“Building E”) which was demolished as part of ongoing environmental remediation

*City of Buffalo Planning Board*

through the New York State’s Brownfield Cleanup Program (“BCP”), and demolition has begun.

Vehicles will access the Site during construction, including delivery and worker vehicles.

Criteria and Thresholds

To ensure the impacts are appropriately reduced, the following criteria and thresholds have been established. These requirements will ensure the Project is developed in a way to most effectively and practicably reduce the impacts on the environment.

**Land Use and Zoning**

**Criteria**

While the Project is consistent with surrounding land uses and densities, specific Site Plans must be reviewed and approved by the City of Buffalo Planning Board and a building permit must be issued by the Building Department before construction can begin.

**Thresholds**

The following thresholds for retail development not yet identified on the Site have been established:

- If buildings are taller than three-and-a-half stories to a depth of 60’ from the property line along Linwood Avenue. The height of these structures may increase as they step back away from Linwood Avenue.
- If any building on site is taller than 10 stories.
- If any single use retail tenant space exceeds 18,000 square feet. This square footage threshold does not apply to a grocery store up to 25,000 square feet, a health and wellness center up to 50,000 square feet, or any office use.
- If total retail space on site exceeds 136,000 square feet.
- If any retail or restaurant space has a public entrance onto Linwood Avenue.

Exceedance of these thresholds will require additional SEQRA review.

**Utilities and Energy Use**

**Criteria**

The Project Sponsor will work with appropriate utilities to ensure sufficient capacity to serve the Project.

Each specific site will be designed with utility requirements such as electric, sewer, water, and gas based on the requirements and needs of the individual building.

**Thresholds**

No thresholds are required.

**Historic, Archaeological and Cultural Resources**

No criteria or thresholds are required.

**Visual and Aesthetic Resources**

**Criteria**

The Project is a multi-year, multi-phase Project; as such, all future buildings will go through the City's Site Plan approval process or other review as required to assess the materials, colors and siting prior to approval.

Once final building designs are established, during site plan review, existing tree cover along Lafayette Avenue and Linwood Avenue will be evaluated to provide adequate visual buffers for the residents of the existing neighborhoods.

**Thresholds**

Additional thresholds for further SEQRA review include:

- If buildings are taller than three-and-a-half stories to a depth of 60' from the property line along Linwood Avenue. The height of these structures may increase as they step back away from Linwood Avenue.

- If any building on site is taller than 10 stories.

**Topography, Geology and Soil**

The Site is relatively flat with very little elevation change. Since no significant adverse impacts were identified, no criteria or thresholds are required.

**Socioeconomic (Including Environmental Justice)**

Since no significant adverse impacts were identified, no criteria or thresholds are required.

**Access, Transportation and Parking**

No criteria or thresholds are required.

**Air Quality**

**Criteria**

The building heating and/or cooling will meet ASHRAE (American Society of Heating, Refrigerating and Air-Conditioning Engineers) and required industry energy code requirements as set forth in the New York State Energy Code and New York State Building Code. Should the units require an air permit, the appropriate permit will be obtained from the NYSDEC.

**Thresholds**

No thresholds are required.

**Solid Waste**

No criteria or thresholds are required.

**Public Services**

Since no significant adverse impacts were identified, no criteria or thresholds are required.

**Construction**

**Criteria**

No criteria are required.

**Thresholds**

If demolition or exterior construction operations are scheduled to occur outside of the 7 AM – 7 PM work day period, additional impact analysis would be required.

If there is more than 18 months between the completion of a construction phase and the beginning of the next phase, the Project developer will be required to stabilize the site with a vegetative surface (i.e. grass).

If public trees are irreparably damaged during demolition activities, the trees would need to be replaced at a greater than 1 to 1 ratio as pursuant to City of Buffalo requirements.

**Cumulative Impacts**

No other significant projects were identified that required analysis as a cumulative impact. The Project is located in a developed portion of the City, and no active projects were identified proximate to the Site.

**REVISIONS**

**1.7 Revision to Text**

There are three revisions to the text of the DGEIS. This is detailed below:

Revision #1:

From Summary of Adverse Impacts:

- *“The Project Sponsor has petitioned the City of Buffalo to rezone the Site to the C1 Neighborhood Business District.”*

The revised text should read:

- *“The Project Sponsor **had** petitioned the City of Buffalo to rezone the Site to the C1 Neighborhood Business District.”*

Revision #2:

From Section 1.4 Summary of Permits and Approvals:

- *“Department of Health Certificate of Authority for Canterbury Woods (which first requires Project approval by the Continuing Care Retirement Community Council, which in turn requires the New York State Department of Financial Services to approve financial feasibility)”*

The revised text should read:

- *“Department of Health Certificate of Authority for Canterbury Woods amendment”*

Revision #3:

From Section 1.4 Summary of Permits and Approvals:

- “The Project Sponsor has applied to Empire State Development for grant funds to help defray site preparation costs associated with the Project.”

## **1.8 Revisions to Figures**

There is one revision to the Figures.

Figure 2-2B is attached. This corrects a previous version that incorrectly displayed the currently proposed Green Code zoning for areas near the project area. Note that this figure represents the Project Sponsor’s proposed green code zoning for the site and all off-site zoning as currently proposed by the City.