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January 16, 2014

VIA HAND and ELECTRONIC DELIVERY

Department of Neighborhood & Business Development
City of Rochester
City Hall, 30 Church Street, Room 125B
Rochester, New York 14614
Attn: Ms. Zina Lagonegro

RE: Supplement to the Nov. 25, 2013 Application (#1136193) for a demolition permit from the Commissioner of Neighborhood & Business Development by Rochester Gas and Electric Corporation to abate and demolish the decommissioned Beebee Station Main Plant

Dear Zina:

As you know, on November 25, 2013, RG&E submitted an application (the "Application") for a Demolition Permit for the above referenced project. Appendix H to the Application included a brief description of a proposed end state of the area after completion of the Project (the "End State"). Since the submittal of the Application, further discussions have occurred between the City and RG&E with respect to the End State. Based on those discussions, the City asked RG&E to supplement the Application with more detail on the End State. This Supplement to the Application, incorporated as part of the Application, is in response.

Please let me know if you have any questions or need any additional information.

Thank you.

Very truly yours,

Thomas C. Greiner Jr.

Enclosures

cc : James W. Rettberg
Gary Ganoung
Ashley Champion
Libby Ford

Beebee Station Demolition & Remediation Project

Supplement to the City Demolition Permit Application (#1136193)

January 16, 2014

Beebee Station Demolition and Remediation Project (“Project”) Supplement to City Demolition Application Related to the Proposed End State

I. Introduction

RG&E submitted an application (“Application”) for a Demolition Permit to the Neighborhood and Business Development Department of the City of Rochester for the above referenced project on November 25, 2013. Appendix H to the Application included a brief description of a proposed end state of the area after completion of the Project (the “End State”). Since the submittal of the Application, further discussions have occurred between the City and RG&E which respect to the End State. Based on those discussions, the City has asked RG&E to supplement the Application with more detail on the End State. This supplement (“Supplement”) to the Application contains the requested information.

II. Overview

All buildings, structures, equipment, utilities, pavements and roads which are not required for on-going site operations will have any remaining asbestos and other hazardous material removed and will be decommissioned, demolished and removed or recycled. In addition, all utilities (gas, electric, potable water, telecommunications, security systems, fire line water and sanitary sewer service), not required for the remaining buildings or on-going hydroelectric station or substation operations will be disconnected and properly abandoned in place or removed. Figure 1 shows the buildings and structures which will remain after the D&R project is complete. Access roads and site drainage features will be restored as necessary.

Long term site maintenance will include vegetation management, snow removal, inspection and necessary upkeep of stormwater drains/outfalls, fencing, lighting, gates and access road maintenance.

III. What Will Remain and Need To Continue To Be Secured

As shown on Figure 1, after the Project is complete, the remaining above ground structures will include the security fencing with gates at the north and south ends of the site, security lighting, four small buildings at the north end of the site (sometimes referred to as the “Falls Street Buildings”), the Station 137 substation, a phase shifter transformer and the access road connecting to Station No. 2 Hydro Plant.

A small parking area immediately adjacent to the north of property address 250 Mill Street and a gravel parking/access area adjacent to the south side of Station 137 also will remain, as will the existing electrical utilities and drainage utilities at the bottom of the gorge on the Beebee Flats.

Old building foundations and underground trenches and ductwork that are more than three feet below the final design grade and all slabs, foundations and other subsurface features in the former Manufactured Gas Plants (“MGP”) area will remain.

Because the larger RG&E-owned Beebee property will continue to be the location of critical electric generation and transmission infrastructure, including Station 137 along Mill Street and Hydroelectric Generating Station 2 which can only be accessed through the Beebee Flats portion of the property and the connecting duct bank beneath the access road, most of the Beebee property will have to remain secured and public access prohibited in accordance with RG&E security requirements.

Further, the eastern half of the Beebee Flats is occupied by two NYSDEC-designated Voluntary Cleanup Program (“VCP”) sites due to the historic use of this portion of the Site by MGP. One of these two VCP sites is still under active investigation and remediation. Regulatory closure of this VCP site is not expected to be achieved until 2018 or later. There can be no public access to the Beebee Flats part of the site until, at the earliest, after the MGP remediation has been completed and approved by NYSDEC.

RG&E will formalize its current arrangements with the City to allow City representatives and contractors access to the Beebee Flats portion of the site for such activities as inspection and repair of the Pont de Rennes bridge support, the High Falls-related projection booth, and other specified activities.

IV. Visual Appearance

Figure 1 conceptually depicts the site as it is proposed to appear at the conclusion of the D&R project. At the upper (Mill Street) level, the area immediately south of Station 137 is reserved for a future expansion of that Station. As shown on Figure 1, adjacent to this reserved area to the south will be open space which will be seeded, maintained and mowed until RG&E has use for it. South of this, the existing paved parking area will remain. This parking lot has historically been used by RG&E or leased as a parking area for nearby commercial buildings. As discussed in Section VI below, some of this parking area could be converted to an overlook accessible by the public.

On the lower (Beebee Flats) portion of the site, the area west of the access road will be covered with soil, seeded and restored to a vegetated state that provides suitable cover and habitat for the birds and urban animals which populate this section of the Genesee River Gorge. A natural field seed mix, such as *Native Upland Wildlife Forage & Cover Meadow Mix*,¹ which will encourage a habitat for animals and birds in the area, will be used for the re-seeding. Mowing will be minimized and/or done on a schedule deemed appropriate to providing habitat/cover to birds and animals. Mowing near the access road and perhaps other structures may need to be more frequent.

¹ Appendix A to this Supplement contains the specifications for this seed mix, which includes approximately 13% seeds for sunflowers and other flowering plants.

The access road,² which provides an approximate boundary line between the designated MGP sites and the former “Main Plant” portion of the Beebee property, will remain in its current location, at least through the completion of the MGP remediation due to the need for both easy MGP site visual delineation and to facilitate heavy load vehicular traffic during both the Project and the MGP site remediation. After completion of the Project, RG&E will evaluate whether the access road can be moved closer to the cliff face while leaving the existing duct bank and other facilities that are under the access road in place. Because of the need to maintain large, heavy vehicle access to the Station 2 hydroelectric facility, and the need to maintain the shale cliff face, moving the access road may not be feasible or cost effective. RG&E will also evaluate whether the access road can be a gravel road rather than paved.

The shale cliff area will be left in as natural a state as possible, given that structures will be removed from it that have been in place for more than a hundred years. Stabilization-related decisions will be made as demolition adjacent to and on the cliff face proceeds, allowing additional geo-technical testing and measurements related to the stability of the rock face to be carried out. Stabilization will likely be achieved through applying a combination of engineered anchors and possible tiebacks with appropriate plantings. As requested by the City, there will be no simulated rocks incorporated into the stabilization process. If necessary for stability, existing wall(s) may be retained. While Figure 1 shows a wall being used for stabilization purposes at one location, the location may change. After discussion with the City, retained walls will either be left as historic remnants or masked from view by berms or other means.

V. Stormwater Management and Drainage

Approximately 10 acres of land, all of which has been developed, will be disturbed during the Project. Most of this is currently occupied by buildings and structures, although some of it is currently bare rock or soil. There will be a significant decrease in the impervious area (from just over 6 acres to about 1.25 acres). In all, there will be a gain of approximately 7.7 acres of landscaped and grassed pervious areas as compared to the current land use. The Project Plans include a design for a post-demolition stormwater management section that relies on infiltration and passive stormwater run-off to the Genesee River (from the stabilized, seeded site) using a portion of the existing stormwater drainage system which will be cleaned and reconstituted using only existing discharge points. Several former stormwater and previously permitted discharge points will be cleaned and filled with flowable fill, preventing further discharges to the River from these points. A Stormwater Pollution Prevention Plan (SWPPP) that is compliant with City and State requirements will be compiled by the D&R Contractor before any land disturbance takes place. It will be provided to the City for review and acceptance before the Project’s Notice

² A temporary access road to the Station 2 hydroelectric facility will be in use during some of or the entire Project to allow safe access during the Project. This temporary road will be on the MGP portion of the property.

of Intent (“NOI”) to be covered by the *State SPDES General Permit for Stormwater Discharges from Construction Activities* is filed.

VI. Enhancements RG&E Will Provide

Consistent with the ongoing discussions between RG&E and the City, RG&E has enhanced its End State from that described as a part of the original November 22, 2013 Demolition Permit Application. These enhancements will include:

- The parking lot off Mill Street will be available for public parking, at least at certain times such as evenings, weekends and holidays.
- If rock stability will allow, an overlook area will be created on the shale cliff slightly below Mill Street, with access from Mill Street over the existing parking lot. If rock stability does not allow an overlook to be installed on the cliff face, a portion of the parking lot may become the public overlook -- or another location will be determined. Figure 1 conceptually depicts where a scenic overlook might be constructed and it also indicates some potential alternative locations for the overlook if rock stability issues make placing the overlook on the shale cliff undesirable. RG&E will initially supply protective, but visually pleasing, fencing around this area and either benches and/or one or more picnic tables.
- If the City wants them, RG&E will provide one or more permanently mounted historic photographs for placement on the Pont de Rennes Bridge and/or at the proposed overlook. These photographs will show the Beebee site when manufactured gas was being produced and when the Beebee Main Plant was producing electricity. They will provide a vivid picture of the general area showing how the Genesee River banks were industrialized in the 19th and early 20th centuries.

Appendix A

Example of Native Wildlife Seed Mix

When seeding the Beebee Flats portion of the property, the following seed mix, or a similar one mutually agreed to by RG&E and the City, will be used.

Native Upland Wildlife Forage & Cover Meadow Mix, ERNMX-123³

- 34% Big Bluestem, 'Prairie View'-IN Ecotype (Andropogon gerardii, 'Prairie View'- IN Ecotype)
- 20% Switchgrass, 'Shawnee' (Panicum virgatum, 'Shawnee')
- 18% Virginia Wildrye, PA Ecotype (Elymus virginicus, PA Ecotype)
- 10% Purpletop (Tridens flavus)
- 5% Coastal Panicgrass, 'Atlantic'-VA Ecotype (Panicum amarum, 'Atlantic'-VA Ecotype)
- 5% Partridge Pea, PA Ecotype (Chamaecrista fasciculata (Cassia f.), PA Ecotype)
- 3% Blackeyed Susan, Coastal Plain NC Ecotype (Rudbeckia hirta, Coastal Plain NC Ecotype)
- 2% Showy Ticktrefoil, PA Ecotype (Desmodium canadense, PA Ecotype)
- 2% Oxeye Sunflower, PA Ecotype (Heliopsis helianthoides, PA Ecotype)
- 1% Plains Coreopsis (Coreopsis tinctoria)

³ See, <http://www.ernstseed.com/seed-mix/?category-id=299>



FIGURE NO.

1

Beebe Station “End State” Concept