

SECTION II

INVENTORY AND ANALYSIS

TOWN OF BRANT

SECTION II INVENTORY AND ANALYSIS

A. INTRODUCTION

The Town of Brant is located in Erie County approximately thirty five miles from downtown Buffalo. It is the southern-most municipality situated along the Erie County waterfront. To the south the town is adjacent to the Cattaraugus Indian Reservation and to the north it is adjacent to the Town of Evans. Brant has the lowest population (2437) of all Erie County towns, due to its small geographic size and rural location.

The Town of Brant waterfront revitalization area extends along approximately 2.2 miles of Lake Erie shoreline and comprises approximately five square miles. The inland boundary of the waterfront area is formed by an imaginary line which extends 500 feet east of the right-of-way of Old Lake Shore Road and by the Evangola State boundary. The boundary varies in width from a maximum of 2 miles at Evangola State Park to a minimum of 1200 feet in the lotus bay area. Reference should be made to Map 1 for a graphic description of the above noted information.

There are three predominant land uses along the waterfront: recreational, open space-brushland, and rural residential. Evangola State Park is located in the northern park of Brant's shoreline. The entire Park includes 733 acres and provides opportunities for swimming, picnicking, camping and other recreational pursuits. Two significant residential hamlets exist along the Brant shoreline - lotus point and wide beach. Most of the structures are permanent residential with some intermingling of seasonal cottages. The remaining shoreline is composed of brushland. Generally, both the waterfront area of the Town of Brant and the remaining areas of the town provide a calm, picturesque rural setting in comparison with the other municipalities that are more urbanized. Critical waterfront issues impacting the town have been identified in part C of this section.

B. PHYSICAL STATUS

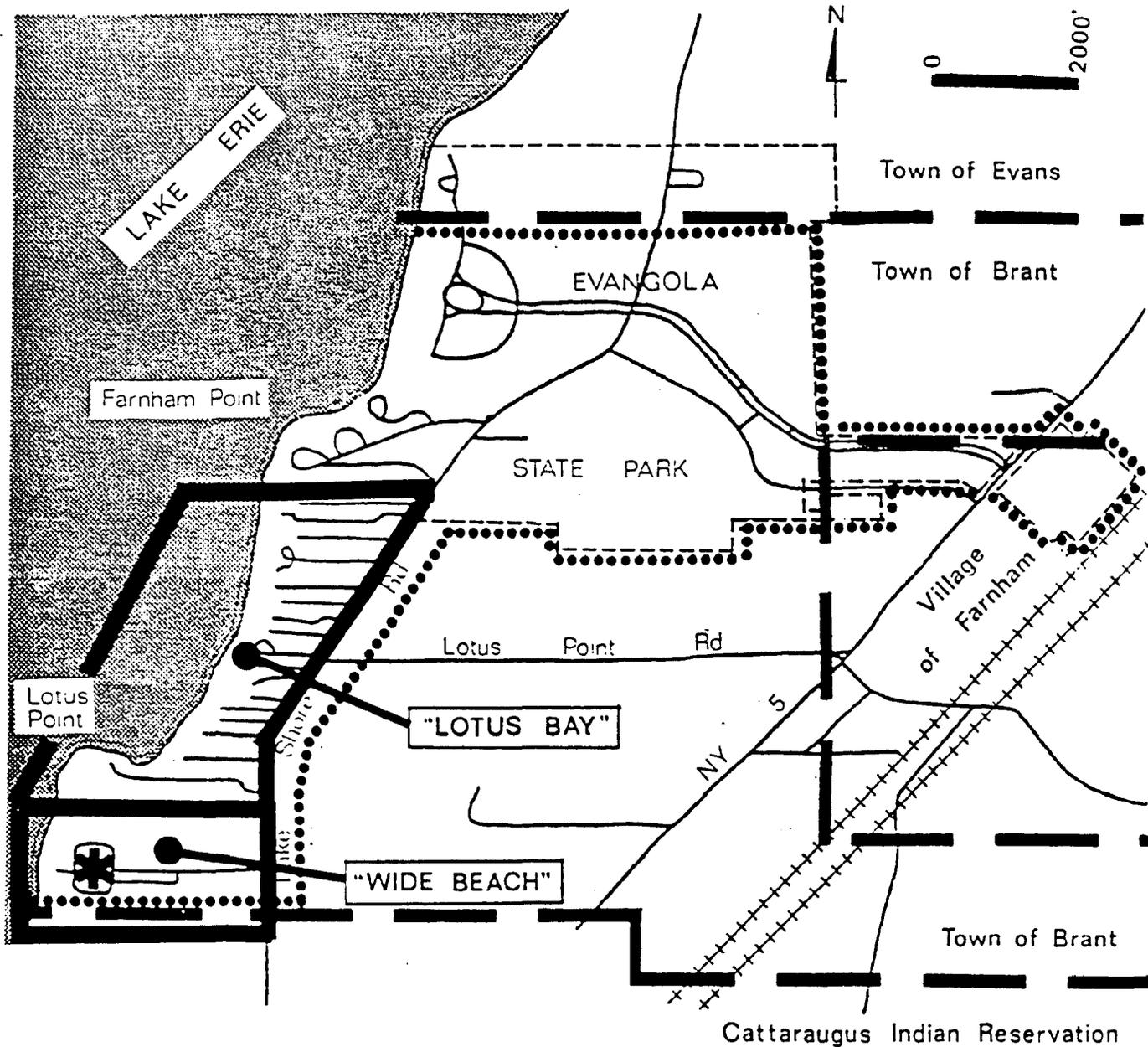
Land Use and Buildings: For the purpose of this narrative, the Town of Brant waterfront area can be divided into three specific zones. These include Evangola State Park, Lotus Bay and Wide Beach.

- a) **Evangola State Park:** The Evangola State Park area extends from the Brant-Evans municipal boundary south for about 4400 feet along the Brant waterfront. It should be noted, however, that Evangola State Park is located in three municipalities: the Town of Evans, the Town of Brant and the Village of Farnham. The entire Park encompasses 733 acres. The Town of Brant portion of the Park which encompasses 650 acres, is all included within the Town's WRA.

The Park is characterized by extensive open space. All recreation activities are located within approximate 245 acres. Almost all are located west of Old Lake Shore Road, the exception being the development of soccer fields to the east of Route 5 in the small portion of the Park located in the Village of Farnham. The remaining acres are used for transportation access to the beach and camp areas. The waterfront area in the Brant portion of the Park provides a 2000 foot long sandy beach which can be used for swimming and scenic viewing. Other scenic viewing areas in the Park are easily accessible from spots north and south of the beach area and are particularly impressive as viewing areas due to the 25-30 foot bluffs.

Few buildings have been constructed on the parkland. A main bathhouse near the beach provides snacks and restroom facilities. Two other buildings in the Park provide room for storage of maintenance equipment and a central point from which Park staff operate.

- b) **Lotus Bay:** The Lotus Bay area extends from the southern boundary of Evangola State Park at Farnham Point south to Lotus Point for a distance of about 5,000 feet. Between Farnham Point and Lotus Point a natural embayment is formed which, due to its attractive vistas onto the Lake has attracted residential development to the shoreline. Land uses include both seasonal and year round single family residential homes that are located along the shoreline (this area is called the Lotus Bay estates) and a small hamlet of residential urban types in the southern section of the area (Lotus Bay Colony). Remaining land in the Lotus Bay area is in private ownership and has been divided into large



LEGEND

- Waterfront Revitalization Area Boundary: Revised
- * Hazardous Waste Site (Inactive)
- ▬ Neighborhood Boundary

<p>LOCAL WATERFRONT REVITALIZATION PROGRAM</p> <p>ERIE COUNTY DEPARTMENT OF ENVIRONMENT & PLANNING</p> <p>April, 1987</p>	<p>MAP 2</p> <p>CHARACTER/ NEIGHBORHOODS</p> <p>TOWN OF BRANT</p>
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privately-owned linear tracts of land some of which are 50 or more acres. These tracts extend as private driveways or roadways off of Old Lake Shore Road west to the Lake Erie shoreline.

A long sandy beach extends along a major portion of the Lotus Bay waterfront. The beach, however is only open to residents of Lotus Bay. In fact, residents of the Lotus Bay Colony are only allowed 200 feet of beachfront to use since landowners of homes along the shoreline have exclusive right to use of their beachfront. The Lotus Bay Community Association maintains the Colony's beach. Town accessibility to the beach in this area has not been an issue and residents do not even take advantage of a 4 foot easement to the beach which exists at the terminus of Surfside Drive, a Town road.

- c) Wide Beach: The Wide Beach area extends from Lotus Point south about 2000 feet to the town's boundary with the Cattaraugus Indian Reservation. The area is characterized by a residential hamlet called the Wide Beach Community, which is located in the southern portion of the area, and by brushlands to the east and north of this residential area. Residences also occur along the shoreline and along privately-owned large linear tracts starting at Old Lake Shore Road and terminating at the waterfront.

This area is not protected by an embayment, as is Lotus Bay, and bluffs which are about 25-30' high have been severely eroded by wind/wave action. In recent years a sandy beach located along this area is also subject to severe erosion. Use of this beach area is similar to that in Lotus Bay, whereby only area residents are allowed use. The Wide Beach Community Association maintains the Association Beach.

A major factor that has impacted existing land use in this area has been the discovery of polychlorinated biphenals (PCBs) contamination. This resulted from the residents' use, from 1968 through 1978, of waste oil for dust control of roadways. It was found that the waste oil was contaminated with PCB's in the early 1980's. The site was eventually listed on the National Priorities List of Hazardous Waste Sites, making it eligible for funding under the Comprehensive Environmental Response, Compensation Feasibility Act of 1980. The area has been under study for the last

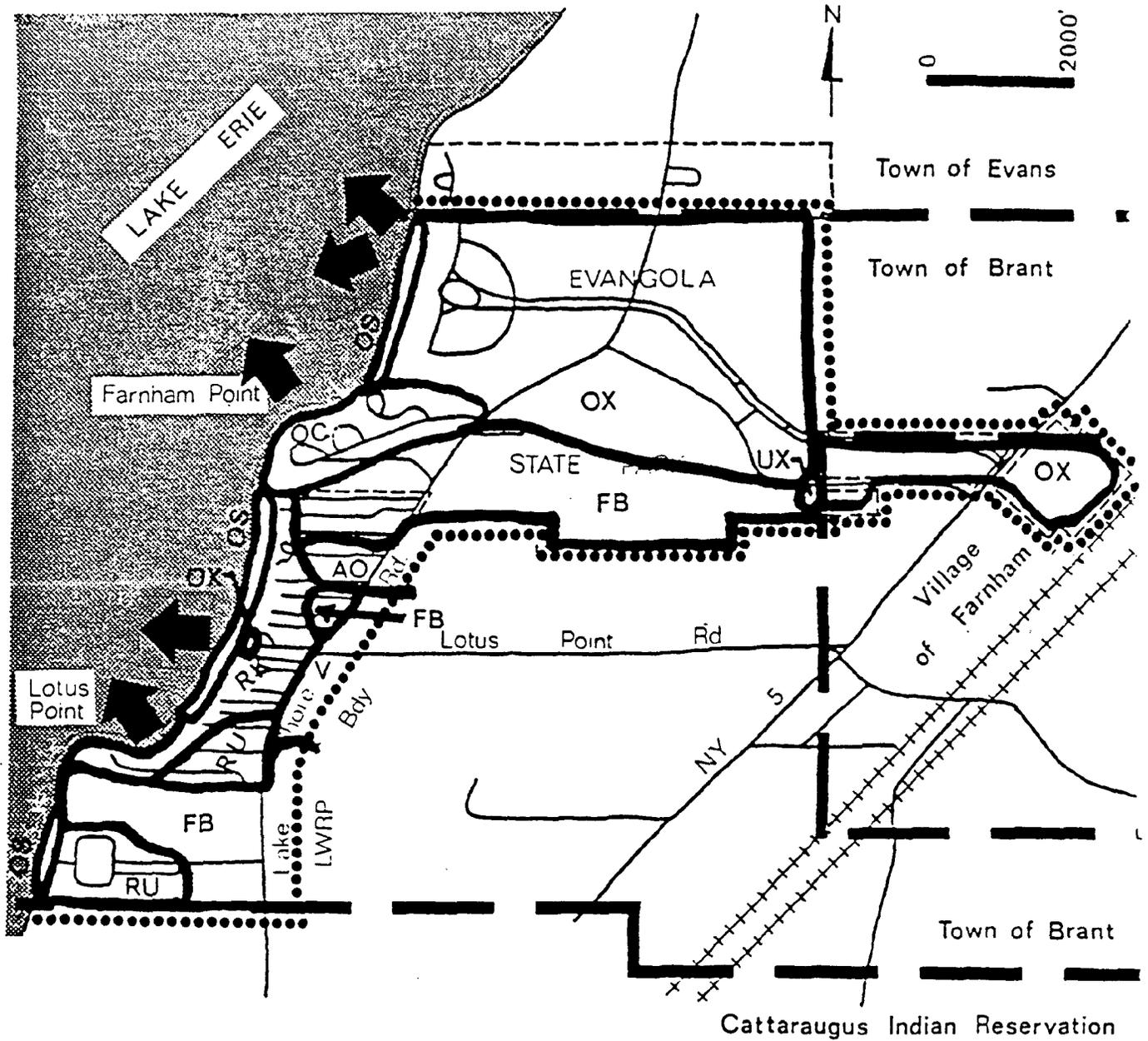
several years, and it appears that remedial actions will be successful in solving the contamination problem. Despite the contamination problem, it appears land use will remain stable.

2. Transportation and Utilities: The transportation network found in the Town of Brant WRA consists mainly of Old Lakeshore Road. This is owned and maintained by the County of Erie. The only Town road is Surfside Drive which extends west off of Old Lakeshore Road through the lotus bay area. Approximately twelve private drives extend in a finger - like fashion off of Old Lakeshore Road providing access into the wide beach area, as well as the lotus point area. The roads are in a variety of conditions ranging from paved to gravel topped surfaces. It is important to note that Old Lake Shore Road is marked by curves and is a two lane highway. Because of these road conditions, slower speeds must be maintained which provides for a picturesque ride through this area. Access into the waterfront area is also provided by the county owned Lotus Point Road. The latter, connects the Village of Farnham to the waterfront zone. As previously noted, public access to the beach is restricted.

A good road access system within Evangola State Park provides easy access to any area of the facility. This system includes a parkway extending from the bathhouse approximately 1.5 miles west of Route 5. Except during the summer months, the parkway is very underutilized. Access to the Park is also provided by two entrance points from Old Lake Shore Road; one of which intersects with the parkway. It should be noted there is no public transportation to Evangola State park.

The entire waterfront area is serviced by public sewers and is included as part of the Lotus Bay Sewer District. The system carries waste to Erie County Sewer District #2's Big Sister Creek Sewage Treatment Plant for disposal. Storm sewers are non-existent in the Brant waterfront area however, roadside ditches are prevalent within wide beach and along some of the private roads. The waterfront area is not serviced by public water, but relies on individual wells.

Existing infrastructure within the WRA adequately services existing development. The extensive reliance on private roads and the absence of public water and stormwater drainage services generally



LEGEND

- RU Residential - Urban
- RK Residential - Shoreline
- OX Recreation
- OC Campground

- OS Beach
- UX Radio Tower
- AO Agriculture
- FB Forest/Brush
- V Vacant

Vista

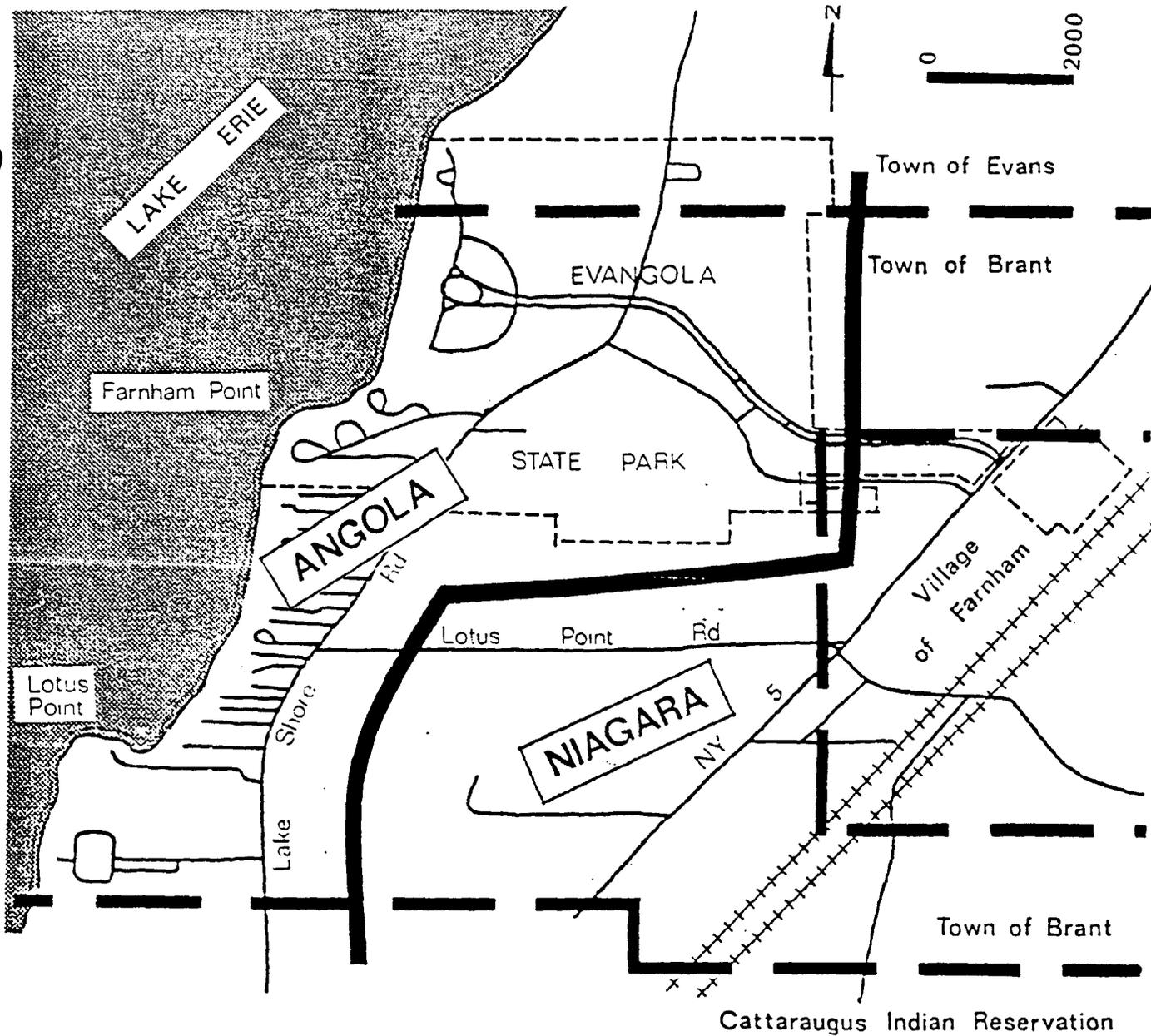


<p>LOCAL WATERFRONT REVITALIZATION PROGRAM</p> <p>ERIE COUNTY DEPARTMENT OF ENVIRONMENT & PLANNING</p> <p>April, 1987</p>	<p>MAP 3</p> <p>EXISTING USES/ VISTAS</p> <p>TOWN OF BRANT</p>
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limits additional development densities and uses similar to existing development.

The Town has contracted with a firm which provides house-to-house solid waste pickup and disposal. Disposal occurs on approved sites outside of the town.

3. Topography (see Map 5) The Town of Brant shoreline includes two natural embayments at Lotus Bay and Evangola State Park. These are characterized by steep bluffs at either end featuring a 30 to 40 foot drop from the bluff to the water. The bluffs are located at the extreme northern end of Evangola State Park, as well as at Farnham Point and Lotus Point. In addition to providing unique topographic formations, they also provide excellent scenic vistas onto the lake. The bluffs continue in less degrees 25-30 feet north and south of the points.
4. Soils (see map 4): The soils are within the Angola classification as defined by United States, Department of Agriculture. This classification consists of nearly level to gently sloping soils and plateau foot slopes. The topography has a shelflike appearance because of the underlying bedrock influence. Brittle shale bedrock underlies the soil at a depth of 20 to 40 inches. These soils are somewhat poorly drained and have a seasonal high water table perched above bedrock during excessively wet periods. The rate of water movement through the soil is slow. Angola soils contain a low to moderate amount of small shale fragments. This soil category is considered to have poor development characteristics.
5. Hydrology (see Map 5): There are four streams and one pond which are located in or traverse the Town of Brant's waterfront area. Two unnamed streams identified as tributaries 22a and 22b of Lake Erie by NYSDEC flow in a northwesterly direction from Old Lake Shore Road to Lake Erie. Both are entirely within Evangola State Park and have a "B" water quality classification. Another "B" classified stream, a portion of Muddy Creek, flows through the town's waterfront area within Evangola State Park on the east side of Route 5. The "B" classification indicates that the streams can be used for bathing and any other use except for drinking or for culinary or food processing procedures. Another Class D stream which is unnamed flows into Lake Erie immediately south of each. It functions more



LOCAL WATERFRONT REVITALIZATION PROGRAM

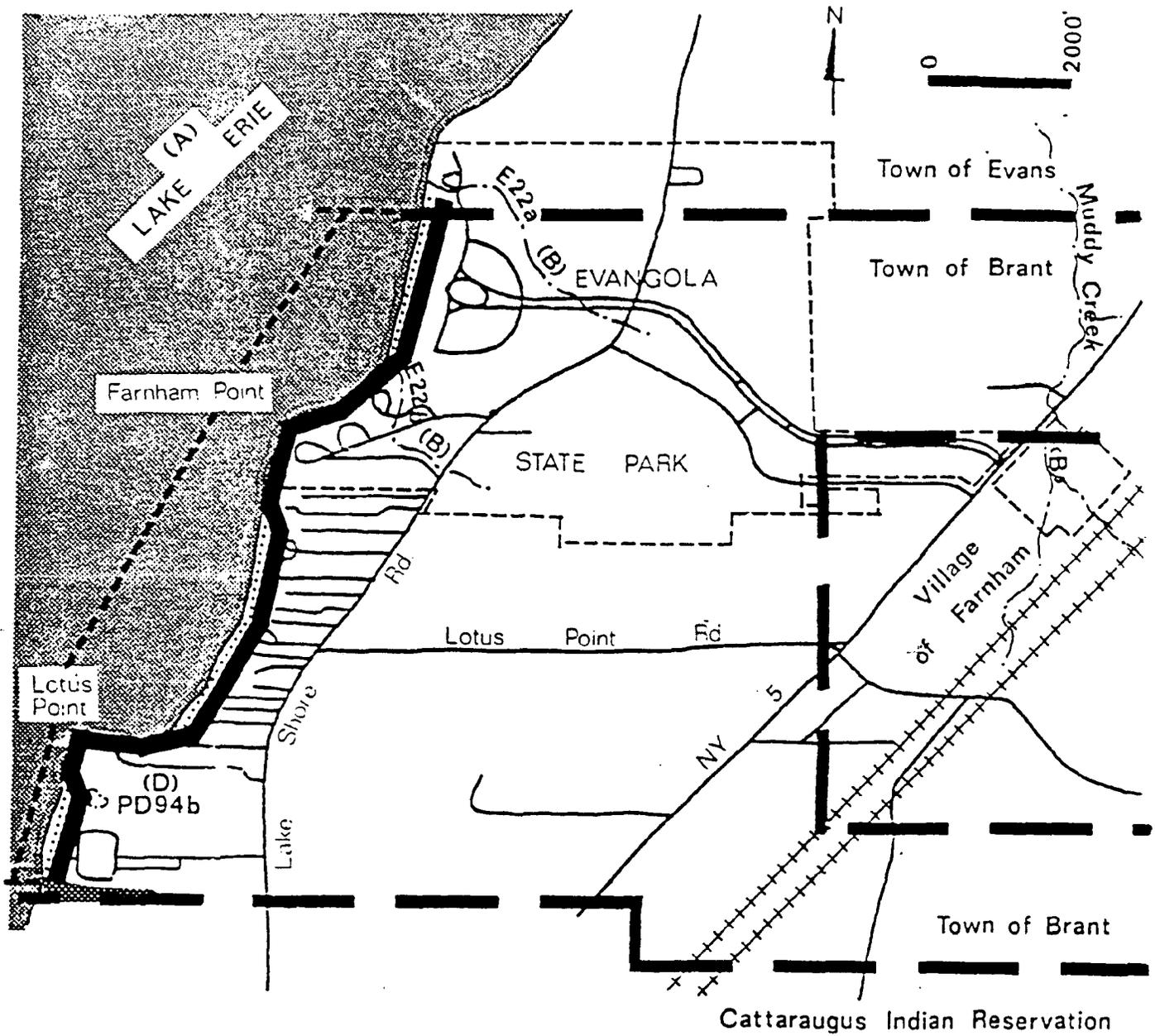
ERIE COUNTY DEPARTMENT OF ENVIRONMENT & PLANNING

April, 1987

MAP 4

SOILS

TOWN OF BRANT



LEGEND

- | | | | |
|--|------------|-----|--|
| | Bluff | (B) | Water Classification |
| | Beach | | Protected Stream/Pond |
| | Floodplain | | Coastal Erosion Hazard Area: Preliminary |

<p>LOCAL WATERFRONT REVITALIZATION PROGRAM</p> <p>ERIE COUNTY DEPARTMENT OF ENVIRONMENT & PLANNING</p> <p>April, 1987</p>	<p>MAP 5</p> <p>HYDROLOGY/ EROSION/ WILDLIFE</p> <p>TOWN OF BRANT</p>
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as a drainageway than a free flowing stream. There is a NYSDEC classified "D" pond just north of the wide beach community. Water can be used only for agricultural purposes. Lake Erie as it flows off shore from the Town of Brant is classified as a drinking supply source, as well as for culinary and food processing purposes.

No wetlands are located within the waterfront area.

The Town's waterfront area is served by domestic water wells. These are supplied by a till aquifer which is capable of supporting domestic supplies as noted in the Erie Niagara Counties Regional Planning Board Report 13

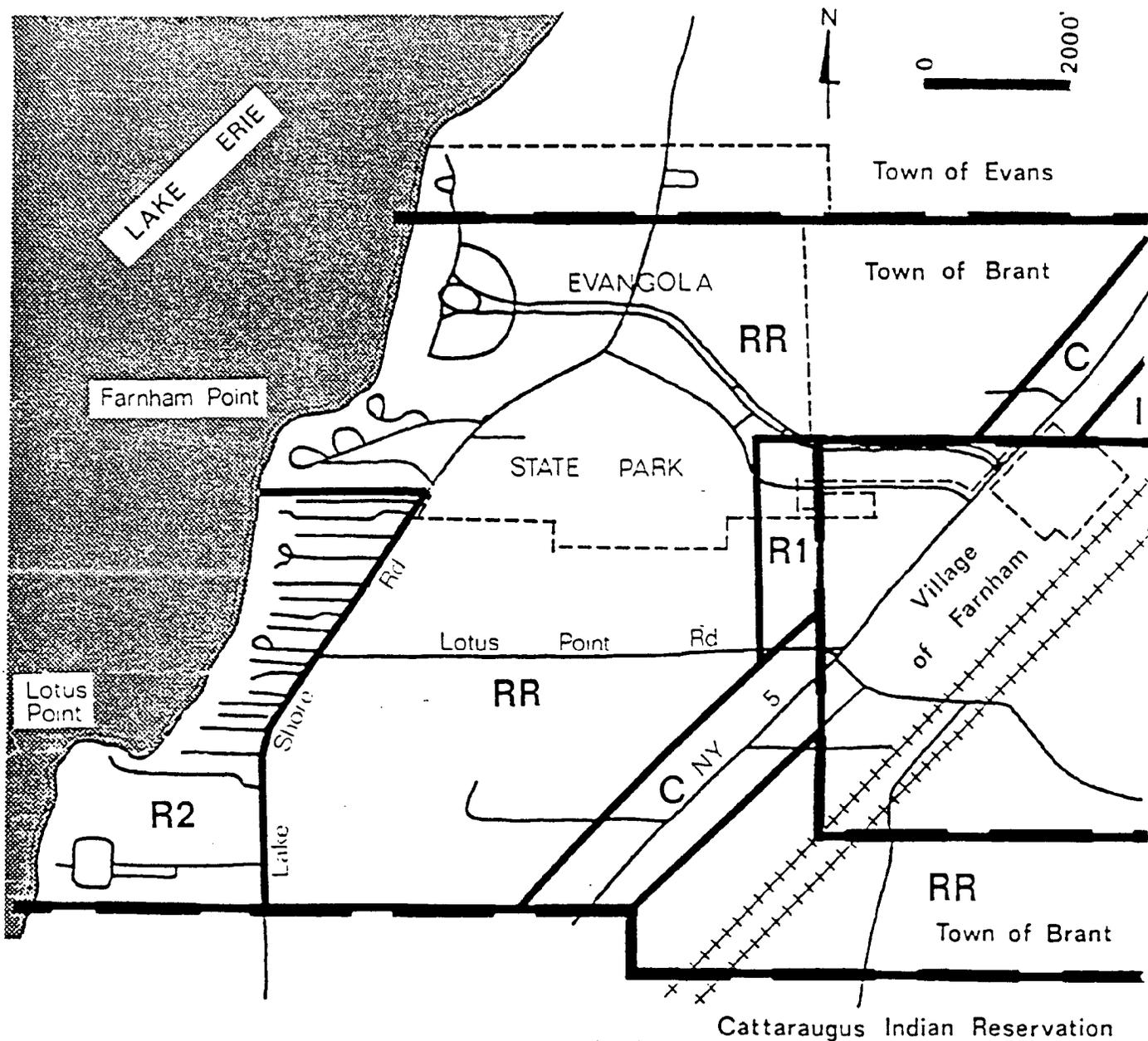
"Groundwater Problem/Analysis". The latter was prepared in December, 1977 as part of the Board's 208 Areawide Waste Treatment Management and Water Quality Improvement Program.

6. Offshore Conditions: Lake Erie gradually increases in depth from 0' to 24' extending approximately 300' offshore. There are no sudden differences in depth. Since completion of the Cattaraugus Creek harbor project, the various beaches in Brant, especially at Evangola State Park, have experienced a sandy like bottom. It appears that the harbor breakwaters may have caused a change in littoral drift patterns to the advantage of bathing enthusiasts further upstream. A negative impact, however, apparently from the harbor improvement is the muddy nature of lake water following heavy storms and an unappealing odor which emanates from the lake. This would appear to be caused by the flow of surface runoff and creek bottom sediment downstream from the Creek. An increased amount of debris build up (uprooted trees, logs, etc.) along the Town's waterfront after strong winds and waves has also occurred in the last few years and could be a result of the project. The U.S. Army Corps of Engineers will be officially asked to monitor the impact the harbor project has had in relation to these issues.
7. Wildlife Habitats: No significant onshore wildlife habitats are known to be in the Town of Brant's waterfront area. It should be noted, however, that Cattaraugus Creek is located approximately one mile south of the Town of Brant. The harbor area and creek are emerging as one of the lake's greatest habitats for salmonid fish species. Therefore, Lake Erie offshore from Brant provides unique fishing

opportunities for the salmonid species as well as small mouth bass and walleye.

8. Flooding and Erosion (see Map 5): A key issue in the Town of Brant involves periodic flooding of a low lying area at the border of Town of Brant and Cattaraugus Indian Reservation. This is the location of the small stream previously described. The flooding has a serious impact on various residential dwellings in wide beach due to odor, and mosquito conditions particularly. It is a recurring problem and requires a remedial solution. The area has been identified as a flood hazard area by the Federal Emergency Management Agency (FEMA). The town will seek assistance from the NYSDEC, FEMA, and the Army Corps of Engineers to address this problem. Erosion along the town's shoreline, characterized by bluffs and beaches, is also a problem. The New York State Department of Environmental Conservation has preliminarily identified the entire Brant shoreline as a Natural Protective Feature Area, pursuant to the Coastal Erosion Hazard Areas Act. It is anticipated that this designation will be finalized during 1988. Erosion has been particularly severe in the wide beach area during the last few years, apparently due to the combination of Lake storms and high water levels.

9. Zoning (see Map 6): The entire waterfront area on the west side of Old Lake Shore Road, with the exception of Evangola State Park, is zoned R-2. This is a seasonal residential classification permitting one family and two-family dwellings, as well as religious and other public uses. Campgrounds are permitted by special permit as well as cluster residential development. Farms are also permitted having a minimum lot size of five acres. The minimum lot size for one family dwellings is 12,000 sq. ft. with a minimum width of 90' and a minimum depth of 100'. The minimum lot size for two family dwellings is 18,000 sq. ft. with a minimum width of 140' and a minimum depth of 100'. Minimum side yard requirements for a one family dwelling are 10' for one side and 25' for both sides. Similar requirements for a two family dwelling are 10' for one side and 30' for both sides. The area on the east side of Old Lake Shore Road is zoned R-R. This is a rural residential classification permitting one family dwellings having a minimum lot size of one acre. Permitted uses also include religious uses, as well as farms and nursing homes. In addition, campgrounds, outdoor commercial recreation, excavation operations, mobile home courts, business



LEGEND

- | | |
|--------------------------|--------------|
| RR Rural Residential | C Commercial |
| R1 Medium Density Resid. | I Industrial |
| R2 Seasonal Resid. | |

LOCAL WATERFRONT REVITALIZATION PROGRAM

ERIE COUNTY DEPARTMENT OF ENVIRONMENT & PLANNING

April, 1987

MAP 6
EXISTING ZONING

TOWN OF BRANT

and professional offices, and animal kennels/hospitals are allowed by special permit. The Zoning Ordinance also includes provisions for sign control which would apply along Old Lake Shore Road.

10. Historic and Archaeological Resources: No structures within Brant's waterfront area have been listed, or are eligible for listing, on the National Register of Historic Places. There are also no structures designated locally as important historic resources, nor have any potentially significant structures been identified in the course of inventorying the WRA's resources. The New York State Office of Parks, Recreation and Historic Preservation has, however, identified a zone of archaeological sensitivity along the shoreline within Evangola State Park.
11. Public Access and Recreation: Public access to the waterfront is presently provided at Evangola State Park. There is an entrance fee during the summer months and there is no preferential treatment given to own residents. It should be noted, however, that the entrance fee is not charged during the spring or fall season nor during the winter months. Therefore, due to the location of the park in the Town of Brant, the area is easily accessible to own residents at no cost during the non-peak season. There is also a summer pass that is available for use all season which is very inexpensive.

Although there are no public recreational facilities along the remaining sections of the Town's shoreline, the Cattaraugus Creek small boat harbor is very close to the Town. This provides onshore fishing access to one of the major fish habitat areas in New York State. The creek is located approximately one mile south of the Town of Brant.

Furthermore, numerous public recreational facilities are provided in the Town of Evans immediately north of the Town of Brant, including the Erie County Wendt Beach and Bennett Beach Parks, as well as the Town of Evans Sturgeon Point Small Boat Harbor. The latter is presently under construction and will be open to area residents in the coming years. Finally, waterfront recreational opportunities are available to those residents living within the Brant areas of Lotus Bay and Wide Beach. The Wide Beach Community Association and Lotus Bay Community Association maintain small private beaches (each approximately 200' long) along the lake.

Furthermore, the numerous private residences situated along the waterfront have immediate access to the sandy beach in front of their residences.

It should be noted, however, that there are no public boat launch ramps within the Town shoreline nor are there any boat marinas. Furthermore, Evangola State Park provides the only public campground along the entire county shoreline. This is a tremendous asset which the park offers, however, due to the lack of boating access facilities the attractiveness of the campgrounds for the boating public is diminished. A private boat launch is located at point breeze in the southern part of the Town of Evans, but it is crowded and unable to accommodate increased use.

12. Water Dependent Uses: The only water-dependent uses within the Brant waterfront area are the swimming beach and other water-related recreational uses at Evangola State Park, and the two small private swimming beaches at Lotus Bay and Wide Beach. There is little demand or potential for development of additional water-dependent uses other than for a boat launching facility at Evangola State Park, as discussed above. The other major uses along the coast include year round and seasonal residential uses which can be considered as water-enhanced due to their shoreline location.

13. Aesthetics: The Town of Brant has a small waterfront area. The key feature of the shoreline is the aesthetic and country-like appearance of the Old Lake Shore Road corridor as it twists and turns in a north-south direction through the Town. An issue which has been raised by numerous residents is the need to preserve the aesthetic appearance of the corridor, as well as the natural setting which the bluffs at Lotus and Farnham Points create. This will be a key goal in the Brant waterfront program.

A problem which threatens the aesthetic appearance of the natural sandy beaches at Wide Beach, Lotus Bay and Evangola State Park pertains to the periodic buildup of debris along the beachfront. This may have occurred due to the Cattaraugus Creek harbor improvement project completed in 1983. Since debris from upstream areas can now flow freely through the creek mouth during periods of high flow, driftwood, brush, and general junk meanders into the lake and is then carried by the lake current onto the Wide, Lotus, and Evangola Beach waterfront which endangers the aesthetic quality of the shoreline.

C. SHORELINE ISSUES

Priority waterfront problems and opportunities for the Town of Brant were identified through a variety of sources. These included a comprehensive field survey of existing conditions; evaluation of questionnaire results distributed at the initiation of waterfront program development to shoreline residents (20% responded); an analysis of previous studies pertaining to the Brant waterfront (e.g. Town Zoning Ordinance, draft Master Plan, NYSDEC wide beach reports, U.S. Army Corps of Engineers Cattaraugus Creek Harbor Improvements -EIS, Erie County Sport Fishery Development Plan, Evangola State Park Master Plan) and information gathered from official meetings (eg. waterfront committee meetings, public meetings, technical consultations).

Critical issues are described in the following narrative and are arranged according to the geographic areas defined in (B1) of this section.

1. Evangola State Park Area -Critical Waterfront Issues
 - a. Water Oriented Recreation: The existence of a campground in the park makes the facility extremely attractive to area residents wishing to combine camping with lake fishing or boating activities. Unfortunately, the Park has no capacity to launch boats other than the car top variety. This is a major deficiency within the park. Reports and use figures concerning Erie County boating access points indicate a need for boat launching facilities.
 - b. Expansion of Recreational Opportunities on Underutilized Parkland: The park encompasses approximately 733 acres within the Towns of Evans and Brant, as well as the Village of Farnham. All recreation activities are located within approximately 245 acres. With the exception of a few soccer fields, these are all located west of Old Lake Shore Road. The remaining acres are used only for transportation access from Route 5 to the beach and camp area. A parkway extends roughly one mile between Route 5 and Old Lake Shore Road with an accompanying 400 ft. wide landscaped right-of-way. The parkway is heavily used in July and August when the beach is open, but very underutilized during the remaining ten months of the year. Consideration should be given to appropriate new uses that could best develop the potential of the Park for existing users, as well as increase the numbers of users on a County-wide basis.

Existing recreation activities are also primarily geared toward summer usage, especially the beach and play areas. The campgrounds are open during the spring and fall, as well. Presently, there are no winter time activities within the Park, nor are there many provided in the Town.

- c. Debris Build-up: During the spring months and after major storms a large accumulation of debris builds up along the beach. This has only occurred since completion of the Cattaraugus Creek harbor improvement project. The latter has opened up the stream mouth and permits unimpeded flow into Lake Erie. Thus, all the debris for miles upstream eventually finds its way to the lake and is then carried by the natural littoral drift to various beaches including evangola and wide beach. Truckloads of debris are removed each spring from Evangola prior to opening the Park for public use.

2. Lotus Bay Zone

- a. Maintain Aesthetic Quality of Old Lake Shore Road: Although this issue pertains to the entire Town waterfront area, it is of particular importance within the Lotus Bay area due to the pristine nature of the zone. The road is 17ft. wide and carries only 1,010 vehicles per day. The vehicles per day figure reflects volume during the summer north of and within the State Park. The road is owned and maintained by Erie County and thus subject to its design guidelines. It presently is considered in substandard condition due to poor road geometrics (ie. curviness of the highway). A key issue is to retain the country-like character of the road, preserve roadside landscaping, and prevent intrusion of unnecessary signage as part of future highway improvements or new shoreline development.
- b. Aesthetic Character of Lotus Bay Beach: As is happening at evangola beach, continuous debris buildup and foul odors degrade from the natural appearance of lotus bay beach. This may have been caused by water flowing out of Cattaraugus Creek during heavy storms or spring thaws. Furthermore, the Lotus Bay Colony Association owns a small beach access point at the west end of their private road. It consists of a concrete breakwall, a rest/viewing area above the breakwall, and a stairway leading down to the beach. The facility is in a state of disrepair and detracts somewhat from that section of the waterfront.

c. Erosion of Beach Area: A combination of severe storms and high lake levels have caused an increase of erosion in the lotus bay beach area, including the bluff area. Due to the embayed nature of the shoreline in this area, the problem is not as severe as in Wide Beach, however, high Lake levels have been identified as a key issue. For instance, the width of the beachfront in recent years has diminished severely.

3. Wide Beach Area

a. Hazardous Waste Remedial Action Program

(1) Background: For 10 years from 1968 through 1978 approximately 40,000 gallons of waste oil, was applied by local residents to the roadways for dust control. In July, 1981 after receiving a complaint from a Wide Beach resident concerning possible contamination from the oil, the Erie County Department of Environment and Planning investigated and found the roadways were contaminated with PCBs. Since then investigations have been performed by the U.S. Environmental Protection Agency (USEPA) and the site was listed on the National Priorities List of Inactive Hazardous Waste Sites, making it eligible for funding under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA).

Through a cooperative agreement, the New York State Department of Environmental Conservation has undertaken a Remedial Investigation and Feasibility Study (RI/FS) to determine the level of hazardous waste contamination. Findings of the RI/FS indicate the need for a remedial program for the site. The remedial investigation part of this study occurred from August through November 1984, and soil, sediment, groundwater, drinking water, vacuum cleaner dust, and air biological samples were collected to determine the presence of contamination.

The findings of the analyses were made public in April 1985 and indicate the following:

- o Contamination was found to be widespread in yards, driveways, roadways, and drainage areas next to roadways.
- o Contamination was found in samples from vacuum cleaner bags.
- o Samples from groundwater observation wells

indicate groundwater contamination is primarily in the sanitary sewer trench.

- o Drinking water well contamination was found to be sporadic and at low levels.
- o Wetland area sediment indicated low levels of contamination.
- o Drinking water on adjacent areas show no detectable levels of PCBs.

Based on these findings, an evaluation of the remedial measures needed to reduce the potential danger to the public health and environment was undertaken and was completed in the summer of 1985.

Implementation of a remedial action program is now pending. It has been delayed due to federal funding delays for program implementation and a need for liability coverage by the consultant being used by NYSDEC. The action program will include further study of areas north of Wide Beach and require removal of hazardous wastes from the yards and other land areas in wide beach by use of a chemical degradation process. This action program will not be completed for 2-3 years.

Residents of Wide Beach are not apprehensive about remaining as homeowners in this area and are willing to undergo whatever measures are required to deal with the PCB problem. It is important to them, however, that after site work has been completed the area is returned to an acceptable level of site improvement for residential living.

Finally, the New York State Department of Environmental Conservation has indicated that the final remedial activity will include continuous monitoring of offsite wells to determine the extent of any migration away from the PCB - contaminated area. In addition, the final remedial activity will include sampling the existing sanitary sewer system for the existence of hazardous wastes. Such sampling has yet to occur.

- b. Erosion of Beach and Bluff Area: A combination of severe storms and high lake levels has caused an increase in erosion along the shoreline, particularly in the Wide Beach area. The shoreline area between lotus point and the Cattaraugus Indian Reservation boundary in the Town of Brant is impacted most severely by Lake Erie wave action. Beachfronts have diminished greatly in recent years and bluff areas

have lost as much as forty feet inland from the top of the bluff.

- c. Aesthetic Appearance: The same debris build up and foul odor which occurs at Evangola State Park and lotus bay also occurs at wide beach.
- d. Flooding: A small two acre floodplain is located in the extreme southern section of the Town immediately east of Lake Erie and adjacent to the Cattaraugus Indian Reservation. This area has been identified as a flood hazard area by the Federal Emergency Management Agency. A further problem is the existence of a drainage ditch installed by the Wide Beach Association which carries drainage into the flood hazard area. This also caused a conflict with the Indian Reservation since confusion exists over the location of the drainage ditch. Numerous residences are impacted by this flooding.

Analysis of the flooding problem and the location and appropriateness of the drainage ditch must be discussed with the U.S. Army Corps, NYSDEC and the Indian Reservation.

- 4. General Issue: Coordination of Waterfront Programs: There will be a continuous need to coordinate waterfront programs particularly with the Indian Reservation and Town of Evans, but exchange of information on commonly shared concerns should occur among all waterfront municipalities in Erie County.