RESPONSE TO COMMENTS ON THE

CATSKILL/DELAWARE ULTRAVIOLET LIGHT FACILITY

DRAFT ENVIRONMENTAL IMPACT STATEMENT

November 30, 2004

TABLE OF CONTENTS

The purpose of this Response to Comments Section is to address public concerns and questions. Several comments were submitted in support of the project and were reviewed but not included in this section.

Item #	Commentor	Comment	Response	Section Reference
Introduction and Project Background				
1.	Town of Mount Pleasant	This section states that the 4 potential projects that have been identified for the Eastview Site are independent and separate environmental reviews. As such, areas of the Eastview Site are "reserved" for these various projects, thereby removing these areas from consideration for mitigation purposes for one or more of the projects. If the City decides not to proceed with one or more of those projects at Eastview (for example constructing the Croton plant in the Bronx), can the areas of the site previously reserved for those uses be "released", allowing the areas to be considered for plan alternatives, mitigation, etc?	Areas reserved for other projects that have been tentatively sited elsewhere (Croton) cannot be considered as site alternatives for the UV project. The location of the UV Facility has been optimized hydraulically and sited so as to minimize potential impacts. The UV project is currently proposing to revegetate those areas reserved for future projects but disturbed by UV construction with plantings appropriate for a landscaped light industrial setting, keeping in context with the surrounding area.	1.2
2.	Town of Mount Pleasant	In the discussion of the site selection process for the UV plant, it was noted that the decision to move the UV plant from the initially preferred Kensico site to the Eastview Site was based, in part, on the requirement that *if* the Croton plant is built at Eastview, the UV plant must be built so as to be directly incorporated into that facility. Does the substantial investment on the part of the City in the UV plant at Eastview effectively assure that the Croton plant would also be constructed there? Must the two plants be geographically proximate? Would the UV plant have to be relocated to the Bronx site if Croton plant is constructed at that location? Further clarification is requested.	This section actually refers to the possibility of siting a filtration plant for the Catskill/Delaware water supply, and discusses the influence of a potential filtration plant for the Catskill/Delaware supply in the selection of the most suitable site for the Catskill/Delaware UV Facility. The selection of the Catskill/Delaware UV Facility site is independent of the Croton project site that has been recently selected by NYCDEP. The siting of the UV Facility was largely based on system hydraulics and possible future integration with a Catskill/Delaware water treatment plant.	1.5.5

Item #	Commentor	Comment	Response	Section Reference
Methodology				
3.	Town of Mount Pleasant	It would be useful if a map could be provided indicating the 1 mile and ½ mile study areas.	While initial discussions of the land use study area appear in Section 3.2.1, a depiction of the overall land use study area was included in a subsequent section (Figure 4.1-1). An approximate one-mile study area radius was identified for the Eastview Site. The approximately one-mile radius for the Eastview Site was selected due to the large properties found in the vicinity of the proposed facility's site. A smaller radius would have captured only a portion of these properties, therefore an approximately one-mile radius was used to delineate this particular study area. In addition, the Taconic State Parkway, the Cross Westchester Expressway/I-287, and the Saw Mill River Parkway function as natural land use barriers and therefore they were considered appropriate boundaries for the study area. A one-mile radius has been added to Figure 4.1-1.	3.2.1
4.	Town of Mount Pleasant	Individual reports submitted by consultants should be part of the Appendix for the report and should include summary data and detailed information on species observed and recorded, species rank where appropriate and summary data on population indices, and habitat classification and evaluation. The summary data and field inventory records would be helpful to further evaluate the impacts on the existing environmental resources and to better understand the reasoning behind the proposed layout and planned impacts to existing environmental features. The data should support and justify the amount of proposed impacts to the site.	All summary reports, field data sheets, and correspondence involving the natural resource assessment of the Eastview Site have been provided in an Appendix to the Final EIS. Section 4.14, Natural Resources of the Final EIS provides a detailed summary of the plants, animals and habitat communities found on the Eastview Site.	3.14.2
5.	Town of Mount Pleasant	Summary reports should be submitted for each of the target focal groups inventoried including, fish and benthic invertebrates, mammals, reptiles and amphibians, breeding birds, vegetation groups and habitat classification.	As noted above, the Final EIS contains an appendix with summary reports and field data sheets for each of the target groups analyzed in the Draft EIS and the Final EIS.	3.14.2

Item #	Commentor	Comment	Response	Section Reference
6.	Town of Mount Pleasant	Habitat classification should follow accepted standards such as Reschke's "Ecological Communities of New York State" 1990, or the recent Biodiversity Manual prepared by Hudsonia for the Hudson River Environments 2003	The habitat classifications employed in the Draft EIS and the Final EIS were based on the updated second edition of Reschke's "Ecological Communities of New York State" 2002.	3.14.2
Introduction & Project Description				
7.	Town of Mount Pleasant	It is recommended that the Mt Pleasant/Greenburgh municipal boundary be added to Figure 4.1.1.	The graphic has been revised to show the municipal boundary in the Final EIS.	4.1.1
8.	Town of Mount Pleasant	How is Mine Brook classified by the NYSDEC?	Mine Brook is classified as a Class C and Standards are C(T). See Section 4.14, Natural Resources, where this information is presented.	4.1.1.2
9.	Town of Mount Pleasant	Three alternate routes have been identified for temporary water main connections to the Town's Commerce Street pump station during pressurization of the Catskill Aqueduct. The preferred alternative runs primarily within roadway rights-of-way, while the two alternatives run in a more direct line through predominantly private properties. Will the preferred alternative result in disruptions to traffic along Grasslands Road, and other public streets? Do either of the alternatives offer fewer disruptions to the existing roadway network?	In the time period between the issuance of the Draft and Final EIS, NYCDEP has revised the design for conveying water to the Town of Mount Pleasant. In order to provide water to the Town of Mount Pleasant and Westchester County Water District No.3 during the pressurization work on the Catskill Aqueduct, two options are under consideration. Under one option, work would take place at Delaware Aqueduct Shaft No. 18 (on the Kensico campus) prior to the pressurization work. This would establish a water main from Delaware Aqueduct Shaft No. 18 to the Town of Mount Pleasant's Commerce Street Pumping Station. Westchester County Water District #3 would still have access to water through their connections to the Town of Mount Pleasant's and Greenburgh's systems. Please see Section 4.1, Introduction and Project Description, Section 4.16 Infrastructure and Energy, and Section 5.1, Kensico Reservoir Work Sites, for a description of this proposed work and associated potential impacts. A 30-inch diameter gravity feed connection would be installed from Delaware Shaft No. 18 Flow Control Structure to the existing Commerce Street Pumping Station. The gravity feed connection from the Delaware Shaft No. 18 Flow Control Structure would be routed from the Kensico campus heading west along Lakeview Avenue and Wall Street before intersecting Commerce Street. This route consists of public roads. Construction would commence in late 2006. The installation of a water main to the Town of Mount Pleasant's Commerce Street	4.1.2.2.2

Item #	Commentor	Comment	Response	Section Reference
			Pumping Station would be similar to a typical utility installation, and would cover approximately 100 linear feet per day. The potential impacts from this proposed water conveyance are discussed in the Final EIS, and no significant impacts are anticipated in association with the installation of this water main. Under a second option, a temporary booster pumping station would be constructed at the Eastview Site and a transmission main would be installed to convey water from a temporary bypass pumping station on Delaware Shaft No. 19. Please see Section 7, Alternatives, for a description of this proposed work and associated potential impacts. A 24-inch force main would be installed from the Eastview Site to the existing Commerce Street Pumping Station via one of two routes. One route alternative would exit the Eastview Site to the east along Grasslands Road (Route 100C), and follow Route 100C east to Woods Road (Penitentiary Road), west of the Sprain Brook Parkway. The piping would continue north along Woods Road onto Westchester County property; then east through the County property; then east across the Sprain Brook Parkway; then east through County property to Route 100; then north along Route 100 to Lakeview Avenue (Old Tarrytown Road). The piping would continue down Lakeview Avenue; north on Commerce Street; under Davis Brook (Davis Brook is currently piped in this location); continue east along Commerce Street; east under the Metro North Railroad tracks and the Taconic State Parkway; and connect to the Commerce Street Pumping Station. The other route alternative would follow the same path as the first alternative up to the intersection with Route 100. At this point, the paths deviate. The piping would continue north along Route 100 to the Catskill Aqueduct Easement into the Gate of Heaven Cemetery to the east; then east within the City property through Gate of Heaven Cemetery; under Davis Brook (Davis Brook is currently piped in this location); east under the Metro North Railroad tracks; east under the Taconic State Parkway; and would connect to the Commerce Street Pumping Station. Between the two options above, the first option results in the fewest interruptions to the existing roadway network. The installation of a water main to Mount Pleasant's Commerce Street Pumping Station would be similar to a typical utility	
10.	Town of Mount Pleasant	Are there any exposed bedrock outcroppings on the site?	There are no exposed bedrock outcroppings on the site.	4.1.1.5.5

Item #	Commentor	Comment	Response	Section Reference
11.	Town of Mount Pleasant	Comments regarding site access were included in the Site Plan review memorandum, dated July 28, 2004.	These comments have been addressed, and submitted to the Town as part of the Site Plan review.	4.1.3.1.5
Land Use, Zoning & Public Policy				
12.	Town of Mount Pleasant	The discussion of potential impacts is limited to the various NYCDEP projects. None of the potential impacts of any of the background growth projects or large scale projects described in Section 4.2.2.2.1 are discussed.	SEQRA and CEQR require that when an Environmental Impact Statement is prepared for a proposed action or project, the baseline conditions of the future without the action or project should be identified. This baseline should be used where applicable to evaluate the potential significant adverse impacts that could result from the proposed action or project. In conformance with SEQRA and CEQR, the potential background growth projects (that were identified in consultation with Westchester County and the Towns of Mount Pleasant and Greenburgh) were included in the baseline for comparison of impacts from the Proposed UV Facility. A discussion of the potential impacts of projects other than the proposed action is not warranted, since independent projects are not the subject of this environmental review.	4.2.3
13.	Town of Mount Pleasant	A very detailed description of the characteristics of the proposed facility on the Eastview Site is presented. This discussion, located within the "potential impact" section of the Draft EIS should include a quantitative discussion of specific project related impacts. For example, the Draft EIS states that "the use of the site would potentially change from a natural undeveloped use to a water supply use." How much of the site will change? What percentage of the site? What specific undeveloped elements of the site would be disturbed (wetlands, wooded areas, grasslands)?	The percentage of the site that would change to a water supply use has been quantified in the Final EIS. See Section 4.14, Natural Resources, for specific undeveloped elements of the site that would be disturbed by the proposed UV Facility.	4.2.3.1.1
14.	Town of Mount Pleasant	The Draft EIS states that trees will be removed from the area above the water conduits, which will change the character of the site. How will the area be left after construction of the project? For example, will the area be maintained as lawn? If so, will herbicides be utilized to limit the growth of invasive vegetation?	The area above the water conduits would become lawn area and would be maintained by periodic mowing (biannual). It is not anticipated that these areas would require the use of herbicides. The wetland mitigation proposed for the north parcel would include the removal of an established Phragmites stand. This would mostly be accomplished by mechanical means and limited use of an environmentally sensitive herbicide such as Rodeo® to keep the phragmites from reestablishing. Such an herbicide would be applied in a manner that would minimize drift and exposure to other habitats.	4.2.3.1.1

Item #	Commentor	Comment	Response	Section Reference
15.	Town of Mount Pleasant	The Draft EIS indicates that the undisturbed areas of the site include sensitive environmental features. Are any located within the areas to be disturbed? If so, they should be identified and the associated impact noted.	The sensitive environmental features mentioned include wetlands. All wetland impacts associated with the proposed UV Facility are disclosed in Section 4.14, Natural Resources and mitigation for these impacts are discussed in Section 6, Mitigation of Potential Significant or Temporary Adverse Impacts.	4.2.3.1.1
16.	Town of Mount Pleasant	It is agreed that land use impacts are frequently perceived from roadways surrounding the site. This type of perceptual impact correlates to the amount of time spent on the roadways. Congested roadways with long delays would result in a greater recognition of surrounding land use impacts. The longer a motorist is on a roadway, the more likely the motorist is to perceive the surrounding land uses. This discussion should provide some reference to traffic conditions, surrounding intersection Levels of Service and the corresponding time available to observe the site.	The two intersections that are predicted to result in significant traffic impacts from the operation of the proposed facility are Grasslands Road (Route 100C) and the Sprain Brook Parkway northbound ramp, and Saw Mill River Road (Route 9A) and Grasslands Road (Route 100C). The proposed UV Facility would not be visible from either of these locations. Other study area intersections would not be expected to experience any predicted significant traffic impacts during operation of the proposed facility. Views of the proposed UV Facility would be possible from certain segments of Walker Road and Route 100C. Vehicles traveling on Route 100C would have brief partial views of the UV Facility when looking in a northerly direction toward the project site. These views would be buffered by distance, topography, and intervening vegetation. Views of the project site from vehicles traveling on Walker Road would consist primarily of landscaped lawn as the UV Facility would be largely blocked by intervening topography and vegetation. However, a vehicle inspection facility including small guard booths to regulate access to the site would be visible from Walker Road.	4.2.3.1.1
17.	Town of Mount Pleasant	In order to conclude that the proposed facility will be “compatible to Grasslands Reservation and many of the office parks in the study area”, a more definitive argument is required beyond that the facility will include “low scale utilitarian structures.” How will these structures compare to the surrounding buildings in terms of square footage, mass, bulk, height, etc. Perhaps a table could be utilized comparing these characteristics.	The required and proposed dimensional requirements for the UV Facility are shown in Table 4.2-4 in the EIS. As described in Section 4.3, Visual Character, the proposed UV Facility would be consistent with the scale, bulk, and height of existing buildings in the surrounding area such as the Westchester County Department of Laboratories and Research building adjacent to the northern edge of the Eastview Site. Similar to existing land uses in the area such as Grasslands Reservation and Landmark at Eastview, the proposed UV Facility would be set on a grassy plot surrounded by a landscaped lawn and trees.	4.2.3.1.1

Item #	Commentor	Comment	Response	Section Reference
18.	Town of Mount Pleasant	The Draft EIS states that "Regardless of the proposed facility, the surrounding area would continue to experience growth." How will the build-out of the Eastview Site be influenced by this continued growth, and what will its role (from a land use perspective) be. Will the site contribute to provide an open space function for the surrounding area? Will it provide transitional buffering, or will it simply blend into with the surrounding institutions and office parks?	The build-out of the Eastview Site would be independent of the growth of the surrounding community. It is anticipated that the surrounding area would continue to be developed as a light-industrial/office park area. NYCDEP endeavors to construct proposed facilities at the site in the same scale and bulk so as to more easily blend with existing and future development. The current project site and the future site with the proposed UV Facility would not include publicly accessible open space. The proposed UV Facility site would provide transitional buffering, and open space habitats more conducive for support of wildlife.	4.2.3.1.1
19.	Town of Mount Pleasant	The potential relocation of the Hammond House should be more fully discussed.	The potential relocation of the Hammond House is discussed in Section 4.12, Historic and Archeological Resources. In addition, Section 7, Alternatives to the Proposed UV Facility, includes an alternative which considers the possibility of leaving the Hammond House on the Eastview Site but no longer using the house as a private residence.	4.2.4
20.	Town of Mount Pleasant	This section discusses the potential of incorporating the Croton plant on the Eastview Site. This summer, it was reported that the City selected a preferred site for the plant at the Hillside site in the Bronx. Is the potential development of the Croton plant at the Eastview Site being studied because the Bronx site may not in fact be developed? If, on the other hand, the Bronx site reflects a final decision, and it will either be built there or not at all, why continue to study Eastview as a potential alternative.	On July 16, 2004, NYCDEP formally accepted the Mosh**o**lu Golf Course site in the Bronx for the Croton Water Treatment Plant project (Croton project). This decision was made after the preparation of the Draft EIS for the UV Facility, which also included an analysis of other NYCDEP projects that could be taken on the Eastview Site. The Final EIS for the proposed UV Facility considers the possibility of the Croton project being located on the Eastview Site since the Eastview Site must be considered as a potential alternative until all legal issues surrounding the Mosholu Site are resolved.	4.2.3.1.2
21.	Town of Mount Pleasant	It is inaccurate to conclude that the full development of the Eastview Site will "not result in substantial changes to the land use." The change from an undeveloped site, to one supporting a significant water supply complex is obviously dramatic.	The statement on page 38, which is partially quoted above, refers to the land use of the area surrounding the site not the Eastview Site itself. As discussed in Section 4.2, Land Use, Zoning, and Public Policy, the proposed UV Facility would constitute a change of land use on the site. However, the proposed UV Facility would be compatible with surrounding land uses and would conform with current zoning and public policy. Therefore, although the proposed UV Facility would change the land use on the site, the Draft EIS concluded that the proposed UV Facility would not result in any significant adverse land use impacts to the Eastview Site or the study area.	4.2.3.1.2

Item #	Commentor	Comment	Response	Section Reference
22.	Town of Mount Pleasant	Have any other lot coverage variances been granted for other uses in the vicinity of the project? What are the approximate site coverages of surrounding parcels?	If needed for this project, the issuance of such a variance is not anticipated to be detrimental to public health and safety, given the relatively large size of the lot and the amount of area that would be returned to its natural state once the proposed projects are in operation. It is not anticipated that there would be a significant adverse impact on neighboring properties if this variance were granted. Furthermore, if additional development is required from NYCDEP at the Eastview Site at some time in the future, the proposed projects would comply with other aspects of the applicable zoning regulations, such as being situated far enough from surrounding properties to avoid any nuisances, and installing fencing or landscaping around the structures to safeguard the public and to screen the facilities from the surrounding properties. With respect to the documentation of the variances for lot coverage of other properties, this is beyond the scope of this Final EIS.	4.2.3.1.2
23.	Town of Mount Pleasant	How much construction worker parking is being provided on the north parcel?	Up to five hundred parking spaces would be provided on the north parcel for construction workers during construction of the UV Facility. If the Croton project is not constructed at the Eastview Site, parking for all construction workers would be available on the north parcel.	4.2.3.2.1
24.	Town of Mount Pleasant	The narrative indicates that of the 865,700 cy of excavated soil and rock, 657,250 cy would be suitable for backfill, suggesting this material will be replaced on site once the project is completed. The text then indicates that 287,000 cy will be transported to the Kensico Reservoir to fill the Aerators. What will occur with the balance of the material – both the balance of the suitable backfill material, as well as the balance of the material *not* deemed suitable for backfill?	A portion of the material available for backfill would be transported to Kensico Reservoir to fill the Aerators. An additional portion would be unsuitable for backfill, and would be removed from the site and the Contractor would be responsible for its proper disposal. The remainder of the suitable material would be used for backfill at the UV Facility.	4.2.3.2.1

Item #	Commentor	Comment	Response	Section Reference
25.	Town of Mount Pleasant	The Draft EIS indicates that mitigation in the form of tree replanting to compensate for the extensive tree removal proposed on the north parcel (approximately 1,700 trees) cannot take place on-site because the area must remain clear for possible other projects, such as the Croton plant. Given the recent determination that the Eastview Site is not the preferred location for the Croton plant, would it now be possible to develop an on-site tree replacement mitigation plan? How long must the site remain as a "possible" site for the Croton plant? When can the Croton portion of the Eastview Site be "reclaimed" for mitigation purposes?	The Eastview Site must be considered as a potential alternative for the Croton project until all legal issues surrounding the Mosholu Site are resolved. The section states: "However, on the north parcel, because of site constraints required to reserve areas on the site for future projects (including the KCT and the Catskill/Delaware Water Treatment Plant), extensive tree replanting on the north parcel would not be possible. "The main site constraint preventing on-site tree mitigation involves a possible Catskill/Delaware water treatment plant." Please see Section 7, Alternatives for further details regarding anticipated development of the Eastview Site.	4.2.3.2.1
26.	Town of Mount Pleasant	What % of construction workers will park off-site?	During the construction of the UV Facility, all of the construction workers would park on-site if the Croton project is not constructed at the Eastview Site.	4.2.3.2.2
27.	Town of Mount Pleasant	It cannot be accurately concluded that the 40,000 ***additional*** truck trips required for the Croton plant project will not result in adverse land use impacts. This additional volume of traffic will certainly affect the way surrounding properties are used (i.e. traffic delays result in altered commutation patterns, etc.). This impact is addressed in the Impact section of the Draft EIS.	The construction of the proposed UV Facility with the Croton project would result in an additional 40,000 truck trips between November 2007 and March 2009. As discussed in the Draft EIS, these additional truck trips would be temporary, as they would occur only during construction. Therefore, the additional truck trips would not be expected to have any permanent effects on land use. As determined in Section 4.9, Traffic and Transportation, the simultaneous construction of both the proposed UV Facility and the Croton project would generate significant adverse traffic impacts throughout the road network. It is possible that this additional traffic generated by these activities could potentially delay traffic on streets affected by this additional truck traffic, but this is not expected to result in significant adverse impacts on land use.	4.2.3.2.2

Item #	Commentor	Comment	Response	Section Reference
Visual Character				
28.	Town of Mount Pleasant	The Draft EIS concludes that upon completion of the project, as well as the other potential site improvements, the site will change from a natural undeveloped site to a developed light industrial water supply complex. Given the context of the surrounding area, this impact may in fact not be adverse; however, it is clearly significant, particularly when other surrounding projects are included. The simple conclusory sentence must be substantially reinforced to justify the conclusion that the visual impacts won't be adverse. Just because the land use is characteristically similar, doesn't mean the visual character is not affected negatively. It is possible that the cumulative visual impact of all of the proposed improvements, both on-site and off-site, may result in certain visual impacts (some of which may be very specific), that are indeed adverse. With respect to a somewhat subjective conclusion concerning visual impacts, such a conclusion is best left to the SEQR Findings, rather than the Draft EIS text, particularly when the Draft EIS did not definitively prove the point.	The Final EIS includes additional points of reference for the evaluation of potential visual character impacts from the proposed UV Facility. As noted in the visual character impact assessment, much of the facility is underground, and those portions above ground would largely be unobservable from the surrounding communities' perspective.	4.3.3.1.1
29.	Town of Mount Pleasant	The summary statement that the UV plant will not be out of character with the County Penitentiary, Medical Center, communications tower, etc., is not accurate. The UV plant's design reflects a rather unique visual appearance, with its low-slung appearance, sweeping curved roof, and relationship to the surrounding topography. This design, which is actually rather sensitive to the site environment contrasts somewhat from the rather stark institutional buildings that surround the site. So while the UV plant is not out of character in an *institutional campus office park* setting, the building's architecture is distinctly different from most of the surrounding buildings.	While the architecture of the UV Facility would be different from surrounding buildings, the facility itself would not be out of character with surrounding uses.	4.3.3.1.1

Item #	Commentor	Comment	Response	Section Reference
30.	Town of Mount Pleasant	Concern exists regarding ambient light generated by the site's security lighting. While it is clear that directional shielding will block lighting from shining directly onto neighboring properties, it is unclear how the high intensity "glow" of the site will impact nearby properties.	Glow from the site is not anticipated to affect the surrounding community. In response to community concerns, lighting along interior site roadways would be placed on 20 foot poles (this is a 10 foot reduction in pole height from the original designs). Wattage for these individual fixtures has also been reduced by approximately 40 percent. These additional features would result in an increase in the number of pole mounted fixtures that would be required for these roadways, but would minimize the potential glow from the site, .	4.3.3.1.1
31.	Town of Mount Pleasant	It is acknowledged that site clearance and the ultimate development of the Eastview Site to support an array of water supply facilities is consistent with the existing zoning as well as the pattern of anticipated land use, however, it is a distinct and significant change from the site's current undeveloped and wooded condition. Some discussion of mitigation for the proposed vegetation removal should be discussed in the Draft EIS. The site plan incorporates new landscaping throughout the site, and particularly along the perimeter of the property. This is in fact a viable mitigation measure, and should be more fully discussed.	See the Final EIS mitigation section (Section 6) for additional details pertaining to proposed mitigation measures.	4.3.3.1.2
32.	Town of Mount Pleasant	A more thorough description of the areas visual impacts associated with the staging and stockpile area is necessary. Will this area be enclosed or fenced? How will this effect views into the site. Will this area be maintained and orderly, or a jumble of temporary structures, stored equipment, material, stockpiled soil, site debris, etc. Further clarification is requested.	The entire construction area would be fenced; this includes the staging and stockpiling area located to the west of Mine Brook. The construction fencing would be chain-link and provided for security against trespass. The fencing would not be designed as a visual barrier. Vehicles passing the site on Walker Road, Dana Road and 100C could observe the construction area in the locations where the existing ground elevation does not obstruct the view. What is observed from these immediate, nearby roads would change over the course of the construction of the UV Facility. Initially upon clearing the site, there would be equipment and temporary storage and office trailers, as well as the construction security entrance off of Walker Road. The stockpiling of excavated soil would be the most obvious visual item early in the project, and will by default screen the main area of the work onsite. As the facilities are constructed, the soil stockpiles will be removed as they are used for backfill. Towards the second half of the project the majority of the work would be performed within the new structures and cannot be directly observed. NYCDEP will require, as part of the Contract specifications, that all areas of work would be maintained and kept orderly throughout the term of construction.	4.3.3.2.1

Item #	Commentor	Comment	Response	Section Reference
33.	Town of Mount Pleasant	Describe the size and appearance of the proposed temporary noise barriers. Are they portable or will they be installed for the duration of the construction phase?	In order to achieve compliance with the Town Code limits during the construction, the contractor would have several choices on how to ensure compliance. One of these measures could include temporary noise barriers, which would be portable and likely 10 to 12 feet high. If employed, they would likely be constructed from a solid structure, weatherproofed, and mounted directly on the ground. Depending on the localized activities, they may only be required for limited periods during construction.	4.3.3.2.1
Community Facilities				
34.	Town of Mount Pleasant	The Police Department will be significantly involved in construction traffic issues. A more explicit discussion of the burden the project will place on the PD is necessary.	A NYCDEP liaison will work with Town to ensure that the Town resources are not overly burdened by the construction of the proposed UV Facility.	4.4.3.2.1
35.	Town of Mount Pleasant	In addition to the adequacy of the Police and Fire Departments to respond to emergencies at the Eastview Site, a significant concern exists regarding the strain the projects may place on the Departments and their subsequent capability to simultaneously address site issues, as well as respond to existing development throughout the Town. For example, if police officers are assigned to traffic control duties during peak construction truck traffic periods, will additional offices be required to address other duties? If so, will this result in increased overtime costs, new hiring, increased expenses, etc.?	A NYCDEP liaison will work with Town to ensure that the Town resources are not overly burdened by the construction of the proposed UV Facility.	4.4.3.2.2
Open Space				
36.	Town of Mount Pleasant	The open space discussion should address the perceptual benefit of the open space resource offered by the site today, and if that benefit would be removed or significantly modified if the project(s) are constructed. If so, will this result in adverse impacts?	The site is not zoned as open space and does not currently serve a public open space function.	4.5.1
Neighborhood Character				
37.	Town of Mount Pleasant	The introductory paragraph indicates that an adverse impact on neighborhood character will result if the "public's ability	For a project to have a significant adverse impact on the character of a neighborhood, it would have to result in a negative change in the overall quality of	4.6.1

Item #	Commentor	Comment	Response	Section Reference
		to view and enjoy the neighborhood" is adversely affected. Neighborhood impacts are in fact, much more broadly perceived. Issues of density, build-out, aesthetics, character, circulation, use and many others, all influence neighborhood character impacts. This should be noted, and properly analyzed.	the neighborhood. While the proposed UV Facility would change the project site from a mostly vegetated site with a low degree of development to a developed site with a light industrial water supply use, the water supply use of the site would be in character with the existing institutional and commercial uses in the surrounding area. In addition, the proposed UV Facility would be similar in scale and appearance to existing buildings in the study area. In fact, these facilities would be less imposing on the surrounding areas, as they would occupy smaller footprints, and would be lower in height as compared to the nearby jail, medical center, and communications tower. Furthermore, the proposed UV Facility would require fewer employees to operate and would generate less traffic then other uses within Grasslands Reservation and nearby office parks. As part of the environmental analyses of the construction of the proposed project, it is acknowledged that the potential impacts if the Croton project were constructed concurrently with the UV Facility would result in relatively large amounts of traffic from the dual construction activities that could result in temporary adverse impact on the neighborhood character of the study area (from these off-site traffic and noise issues).	
Socioeconomic Conditions				
38.	Town of Mount Pleasant	The Draft EIS indicates that the Croton plant will generate $5.8 million annually in either property taxes or a PILOT. How was this figure derived? How would a PILOT be used instead of real estate taxes?	Real property tax revenue/PILOT projections were based on the established methodology whereby current applicable tax rates and equalization rates were applied to estimated taxable real property value of the Project. The use of PILOT revenues by the affected local jurisdictions is mentioned in the text, since the methods of payments from NYCDEP to the involved entities has not been finalized.	4.7.2.2.2
39.	Town of Mount Pleasant	Peak construction will involve 652 construction workers at the site, and add 1,400 spin-off jobs to the county economy. Are these ***new*** jobs or existing jobs attributable to the project?	Jobs created directly and indirectly during the construction period represent new jobs in the economy. Without the project, these jobs would not otherwise occur.	4.7.2.2.2

Item #	Commentor	Comment	Response	Section Reference
40.	Town of Mount Pleasant	Substantiate the assertion that the project will add $2.0 – $2.6 billion in economic benefits to the county.	The economic benefits created by the construction of the Project would result from the direct capital investments in building materials and supplies, as well as the investment in labor to construct the Project. These direct investments in the economy result in secondary spending (e.g., the expenditure of workers' salaries on goods and services) that, in turn, result in further economic activity and benefits. In addition, the direct and indirect (or secondary) expenditures generate sales taxes and income and corporate taxes which represent economic benefits. As outlined in 3.7.1., Methodologies, the RIMS II as developed by the U.S. Department of Commerce was used to estimate indirect beneficial effects.	4.7.2.2.2
41.	Town of Mount Pleasant	The second paragraph indicates that "the Croton project could add an annual average of approximately 1,400 new jobs to the county economy." The 3rd paragraph indicates however "spin-off benefits from the Croton project could add 186 new jobs to the county's economy." Clarify these apparently contradictory statements.	The first number, 1,400 (which has been updated to 1,736 in the Final EIS) reflects the number of indirectly created new jobs ascribed to the construction of the Croton project. The second figure, 186, represents the number of indirectly created jobs resulting from the ongoing operation of the Croton project upon the completion of construction, should it be constructed at Eastview.	4.7.2.2.2
42.	Town of Mount Pleasant	The Draft EIS notes that "there are few remaining land areas suitable for conversion to residential development." In the next sentence it reads; "Institutional expansion and associated residential housing remains a potential source of residential growth within the study area." These sentences appear contradictory and should be clarified.	This section states that potential institutional expansion could stimulate residential development of available sites; however, there are few remaining land areas suitable for conventional residential development in the study area that may be affected by such expansion. See next comment for additional clarification.	4.7.2.2.1
43.	Town of Mount Pleasant	An effort should be made to gauge future trends in institutional related residential housing.	Housing needs associated with institutional expansion result from new employees relocating from outside the area to homes closer to the workplace. Correlating new residential development of the limited land areas within the study area to institutional expansion requires an analysis of the new institutional expansion-related employment, the effect of this new employment on the workforce, and the extent to which existing housing supplies accommodate new employees relocating to fill new jobs. Such analysis is not warranted in this Final EIS, since it is not related to the proposed UV Facility, nor does it influence the evaluation of potential significant impacts that would result from the proposed UV Facility.	4.7.2.2.1

Item #	Commentor	Comment	Response	Section Reference
44.	Town of Mount Pleasant	The Draft EIS notes one undeveloped multi-family residential parcel in the study area. If developed, how many units could the site support?	No proposals for residential development were identified within the study area. The projection of how many units could be developed on a particular parcel is beyond the scope of this Final EIS since it is not related to the proposed UV Facility, nor does it influence the evaluation of potential significant impacts that would result from the proposed UV Facility.	4.7.2.2.1
45.	Town of Mount Pleasant	The "additional swell of development" noted if the 9A bypass is constructed, should be addressed.	Potential additional development resulting from a Route 9A Bypass project would not be expected to occur by the time of the project's start of operations. The basis of estimated new projects in the area during project construction and by the timeframe of project completion was developed in consultation with Westchester County's Department of Planning and the Towns of Mount Pleasant and Greenburgh.	4.7.2.2.1
46.	Town of Mount Pleasant	This section of the Draft EIS, which deals with socio-economic conditions of businesses, should provide some discussion of actual conditions. Is the majority of the workforce in the study area highly paid doctors at the Medical Center, or minimum wage support staff (to illustrate extremes). In the context of socio-economic conditions, total numbers are irrelevant without the subsequent analysis.	The level of description of the existing business conditions and workforce characteristics in the study area is appropriate for the analysis presented in the Final EIS. The additional studies requested in the comment are not warranted, since they do not affect the evaluation of potential significant adverse impacts that may result from the proposed UV Facility.	4.7.2.2.1
47.	Town of Mount Pleasant	The Draft EIS states that the data reviewed are inconclusive regarding the effect on property values from undesirable land uses. Yet, it further concludes that the UV Facility would not cause land values to rise or fall. It appears inconsistent to draw such a conclusion. Absent any other supporting documentation, the Draft EIS must conclude that an impact on property values *may* occur as a potential unavoidable environmental impact.	The EIS summarizes the results of analyses which concluded that the operation of the proposed UV Facility would not cause commercial or residential property values to significantly rise or fall. Therefore, the EIS made the proper conclusion.	4.7.3.1.1

Item #	Commentor	Comment	Response	Section Reference
Traffic & Transportation				
48.	Town of Mount Pleasant	The Draft EIS indicates that the Sprain Brook Parkway will handle the majority of employee related construction traffic. Pick-up trucks with commercial vehicle registrations are very common construction worker vehicles. These vehicles are prohibited from the parkway. This conclusion should be either substantiated or modified.	The assignment of construction worker traffic was distributed throughout the traffic network with approximately 25% assigned to Route 9A, approximately 20% assigned to 100C, approximately 5% assigned to local routes, and approximately 50% assigned to the Sprain Brook Parkway. This is representative of existing travel patterns in the area. The word majority that was used in the Draft EIS just refers to the fact that the highest component of the worker assignment utilized the Sprain Brook Parkway, but certainly not exclusively as indicated by the percentage listed above.	4.9.2.1
49.	Town of Mount Pleasant	The failure of the traffic study to "balance" turning movement volumes between intersections should be further addressed. This can be viewed as a deficiency in the study in cases of comparative analysis.	As stated on page 8 of Section 4.9.2.1.1 of the Draft EIS "Since the study intersections represent only a portion of the roadways in the study area, the turning movement volumes of adjacent intersections may not balance (i.e., the traffic exiting one study intersection may not equal the traffic entering the adjacent study intersection.) This is due to several possible factors including other intersecting roads and residential and commercial entrances between study intersections..." Due to the presence of these sinks and sources (e.g., driveways to facilities that are located between intersections where traffic counts were undertaken), the network cannot balance 100 percent, and it would be incorrect to present it that way.	4.9.2.1.1
50.	Town of Mount Pleasant	The narrative should include a discussion of why Saturday peak hour volumes have not been measured and analyzed.	The impacts from potential construction work on Saturdays were included in the Draft EIS (see page 42 of the Draft EIS, Section 7, Alternatives). It is important to note that ATR counts show that Saturday volumes are generally lower compared to weekday volumes. The traffic generated by the project during construction and operation over the weekends would be less when compared to the corresponding weekday values. Therefore, the analysis of weekday hours represents the most conservative time period of the assessment of impacts.	4.9.2.1.1
51.	Town of Mount Pleasant	Was accident data collected from the Mt Pleasant and Greenburgh Police Department's?	The accident data was obtained from NYSDOT which shares the same database with all law enforcement agencies, including the Mount Pleasant and Greenburgh Police Departments.	4.9.2.1.2
52.	Town of Mount Pleasant	How would the future without the project (FNB) analysis change if the mitigation measures recommended within the specific no-build projects were *not* constructed?	The following intersections included mitigation measures that were included in the Draft EIS No Build analysis: • Saw Mill River Road (Route 9A) and the Cross Westchester Expressway (I-287) a geometric change that widens the eastbound service road and the entrance ramp. The CAT/DEL UV project does not impact traffic	4.9.2.2

Item #	Commentor	Comment	Response	Section Reference
			operations at this intersection (both with and without these NYSDOT sponsored measures). These changes are part of NYSDOT I-287 rehabilitation project. • Route 9A/Tarrytown White Plains Road (Route 119) signal timing/rephrasing changes and geometric changes. These improvement measures are part of the approval for the Avalon Green project. If these measures are not implemented it is logical to assume that the traffic from the Avalon Green project would not be present. Therefore, there would be no need for improvements and no material changes to the results presented in the Draft EIS. • Route 9A/Dana Road signal retiming/rephrasing changes and the creation of exclusive turn lanes on Route 9A. These changes are to accommodate the Home Depot driveway that would be the fourth leg of this intersection. These improvement measures are part of the approval for the Home Depot project. If these measures are not implemented it is logical to assume that the traffic from the Home Depot project would not be present. Therefore, there would be no need for improvements and no material changes to the results presented in the Draft EIS. In the analyses performed for the Draft EIS, the CAT/DEL UV project did not impact operations at this intersection. However, in consideration of the Option E alternative to transport fill material from Eastview to Kensico that would utilize this intersection, an additional set of analyses were performed for this intersection for the Final EIS. The results of these analyses indicated that there would be no significant adverse impacts without the proposed improvements from the Home Depot project (and without the associated Home Depot traffic) at this intersection. Minor signal timing changes could offset the predicted temporary adverse impacts from trucking activities through this intersection under Option E if the Home Depot intersections improvements are not in place. • Old Saw Mill River Road/Saw Mill River Parkway Southbound Off Ramp signal retiming/rephrasing changes and geometric changes. These improvement measures are part of the approval for the Landmark at Eastview project. If these measures are not implemented it is logical to assume that the traffic from the Landmark development would not be present. Therefore, there would be no need for improvements and no material changes to the results presented in the Draft EIS. • Old Saw Mill River Road/Saw Mill River Parkway Northbound Off Ramp signal retiming/rephrasing changes and geometric changes. These improvement measures are part of the approval for the Landmark at	

Item #	Commentor	Comment	Response	Section Reference
			Eastview project. If these measures are not implemented it is logical to assume that the traffic from the Landmark development would not be present. Therefore, there would be no need for improvements and no material changes to the results presented in the Draft EIS. The CAT/DEL UV project did not impact operations at this intersection. • Grasslands Road (100C) and the Sprain Brook Parkway Northbound Ramp where a signal retiming is proposed as part of The Landmark at Eastview project. These improvement measures are part of the approval for the Landmark at Eastview project. If these measures are not implemented it is logical to assume that the traffic from the Landmark development would not be present. Therefore, there would be no need for improvements and no material changes to the results presented in the Draft EIS.	
53.	Town of Mount Pleasant	The applicant should offer an opinion as to whether or not improvements to the operation of the 2 signalized and 8 unsignalized intersections that will operate at unacceptable LOS in 2008 are technically feasible and would improve conditions. Currently, the text simply notes that the agencies responsible "could potentially" improve operations (same for 2010 FNB).	In the time period between the issuance of the Draft EIS and Final EIS, NYCDEP held meetings with the NYSDOT, Westchester County and local representatives to review the potential traffic mitigation measures that were described in the Draft EIS. In general, the review agencies and the local representatives generally recommended traffic management techniques (Maintenance and Protection of Traffic Plans, MPTs) in lieu of a traffic signal at unsignalized intersections that could be materially affected by heavy truck trips during construction. These MPT plans would provide for the safe and efficient movement of construction related traffic through study area intersections and roadways. The timing measures that are recommended at the signalized intersections can be implemented based on NYCDEP's meeting with the review agencies. NYSDOT and the County have indicated they would review the changes recommended in the Draft EIS and incorporate the timing changes if deemed necessary. Many of the traffic signals at the intersection included in the analyses (and at locations were signal timing improvements are suggested under "mitigation") have "actuated" signals. Instead of computing the re-optimization of the signal via the actuation process (which is a typical analysis approach from project's undertaking comparable studies in Westchester County), the NYCDEP applied a rigorous methodology that did not take benefit of the natural, re-optimizing of the signal in the "With the Project" scenarios, and only demonstrated such benefits in the mitigation section. At the signalized intersection of Grasslands Road and Bradhurst Avenue the restriping change proposed for the eastbound approach was considered infeasible.	4.9.2.2.1

Item #	Commentor	Comment	Response	Section Reference
			However, a new signal plan that provides protected eastbound and westbound phases (with a possible restriping of the westbound approach to make the exclusive left-turn lane a shared through-left-turn lane) was developed in initial consultations with NYSDOT. Based on input from the review agencies and the local representatives, NYCDEP is providing supplemental information regarding these measures which are contained in the Final EIS.	
54.	Town of Mount Pleasant	This figure depicts off-site construction worker parking locations. The map does not clearly point out the specific locations such as the Landmark, Home Depot, etc. This figure should be revised to show these sites and clearly mark the travel routes.	The figures have been revised to more clearly present the locations of the off-site parking areas and the routes to these sites.	4.9.2.2.2
55.	Town of Mount Pleasant	The potential impact section notes that traffic conditions will be significantly altered by the action and that numerous intersections will be degraded or fail, resulting in significant adverse impacts.	The EIS analyses addressed the potential traffic impacts under numerous phases of the project, including construction and operational components, for two future scenarios (with and without the Croton project). With respect to post-construction operational impacts, NYCDEP has identified potential significant adverse impacts resulting from the proposed UV Facility. However, even though the impacts from traffic related vehicles would be temporary, these predicted impacts were identified as temporary adverse impacts. NYCDEP has identified the potential short- and long-term traffic impacts from the proposed UV Facility, and has worked with the review agencies and local representative to develop feasible mitigation measures to reduce the potential traffic impacts from such activities.	4.9.3
56.	Town of Mount Pleasant	In a number of locations, a discussion of pavement infrastructure is presented that utilized a traffic loading to pavement lifespan equation. The Draft EIS states that depending on the route selected, the UV plant project will generate as many as 80,000 annual truck trips (not including the other potential projects at Eastview). This discussion is inadequate and requires additional support. First, the narrative should include a discussion of the construction traffic impacts on the pavement infrastructure if the other projects are constructed. Secondly, the conclusions that the project will not result in significant impacts to the pavement infrastructure appears to be fundamentally flawed. The analysis is based upon a vehicle load/pavement design formula that is based upon a premise that the pavement is essentially new. In fact, the roadways surrounding the site	Comment noted. The Draft EIS identifies all project impacts requiring potential mitigation measures. The criteria that was applied by NYCDEP to evaluate potential traffic impacts is the guidance supplied in the City's *CEQR Technical Manual*. Detailed truck trip generation and monthly distribution data is contained within the Appendix of the Final EIS. As shown in the Appendix, the CAT/DEL UV project would generate truck traffic from April 2005 to September 2009. The peak periods of truck activity would be associated with the filling of the Aerators and the general construction period of the project. The filling of the Aerators would occur in 2006 and 2010 and would likely involve approximately a 6 month time period when generated truck traffic would be approximately 17,600 total truck trips between the Eastview Site (the source of the fill) and Kensico (where the fill would be dumped). The general construction	4.9.3

Item #	Commentor	Comment	Response	Section Reference
		reflect varying pavement conditions of various ages. The initial "starting point" used to measure the 20 year useful lifespan of the roadway pavement would obviously vary from roadway to roadway. So while some of the roadways along the truck routes may be able to successfully support the thousands of anticipated trips, there are other roadways that may fail after only a few trips. This is an important consideration, and may significantly effect the evaluation of project impacts. For example, what would happen if a particular roadway would have to be closed during the construction of the plant, to be reconstructed and resurfaced? What would such a situation do to projected traffic patterns and trip assignments and generations? The pavement infrastructure analysis must include a thorough and detailed physical evaluation of existing pavement characteristics so that an accurate initial baseline can be established. Beyond the simple pavement adequacy formula presented in the Draft EIS, a much more thorough analysis of roadway impacts resulting from construction traffic should be carried out. Curbs, catch basins, drainage facilities, right-of-way impediments should all be evaluated to determine the potential impacts of the tens of thousands of heavy truck trips. For example, at key intersections and given various lane striping patterns and roadway geometries, it is relatively common for large trucks to mount curbs as they make a turn. How will this affect the curbs? Similar concern exists regarding street trees, mail boxes, walls and fences, etc. In addition, the analysis should also provide a discussion of other construction truck impacts on surrounding properties, such as noise, odor, particulate impacts. Will particulates settling out from diesel exhaust from the tens of thousands of truck trips cause impacts? Some of these potential impacts may be described as quality of life issues.	period would last approximately two years (March 2007 to March 2009). During that two-year period there would be approximately 42,000 total truck trips. The EIS assessed these truck loadings against the industry and NYSDOT standard – the 18-kip Equivalent Single Axle Load (ESAL) analysis. This procedure assesses what impact the truck loading (predicted loading) would have on certain pavement/roadway types (design loadings). Each roadway type has a certain 20-year design loading – highways (10,000,000 to 80,000,000 ESAL), arterials (2,000,000 to 5,000,000 ESAL) and local (50,000 to 500,000 ESAL). The Draft EIS concluded that both operations (Aerators and general construction) would not adversely impact study area roadway pavement. The truck loadings from the project (24,000 ESAL associated with the Aerator filling operations and 57,000 ESAL associated with the general construction) would be relatively small when compared to the design loadings of study area roadways. The general construction traffic would be assigned to the local highway system and major arterials, the 57,000 ESAL associated with this activity is also minor compared to the upper limit of the range for these roadway types. The filling of the Aerators which could involve traveling on local roadways and major arterials, the 24,000 ESAL associated with this activity is also well below the range for these roadway types. The 2002 NYSDOT Highway Sufficiency Ratings indicate that the pavement structure on study area roadways for the most part is in good condition. Therefore, as part of the construction of the proposed UV Facility, these roadways would not be subjected to incremental loads that are near or greater than the corresponding ESAL design loadings. It is important to note that heavy truck traffic comprises approximately 10 percent of the total traffic on the roadways near the project site (e.g., Route 9A, Route 100C, etc.). These roadways carry Average Annual Daily Traffic Volumes (AADT) that approach 25,000. Therefore, heavy truck traffic approaches nearly 2,500 trucks per day. In comparison, the number of trucks trips generated by the project is relatively small (peaking at 202 per day associated with the filling of the Aerators and 170 per day during the general construction time period), comprising less than eight percent of the total truck traffic currently experienced on study area roadways near the project site. In addition, such traffic would occur only over a relatively short time in comparison to the roadway bed useful life cycles. If necessary, the MPT plans that would be developed for the project would ensure that private property is not damaged during the trucking activity associated with the project. Also NYCDEP would coordinate these plans with responsible review agencies and none of these plans would include road closures. For example,	

Item #	Commentor	Comment	Response	Section Reference
			during the time period when the two 12-foot water conduits would be constructed across 100C, plans have been developed that maintain all lanes open and includes the possibility of a by-pass road to ensure that this is the case. In addition, at times when the peak truck trips related to the filling of the Aerators would occur, no significant on-street construction activities to build additional water conduits would occur on the affected Aerator truck routes. The impact of trucking on air and noise is discussed in those sections.	
57.	New York State Department of Transportation	We are also concerned with the potential damage to the highway that this many axles loads may cause. Please provide us with a report that assesses the material condition of the existing highway and determine what strengthening or minor geometric improvements are feasible.	A detailed assessment of the potential impacts from axle loads was performed. See Response 56.	4.9.3
58.	Town of Mount Pleasant	What is the basis for the assumption that 20% of construction workers will car pool?	A vehicle occupancy rate of 1.2 (20 percent carpooling) is a standard occupancy rate used in traffic analyses. Standard sources such as Pushkarev and Zupan, the Institute and Transportation Engineers (ITE), and the City Environmental Quality Review (CEQR) Technical Manual all recommend this vehicle occupancy rate or higher for various land uses and traffic studies.	4.9.3.2.1
59.	Town of Mount Pleasant	Traffic assignment of construction workers should reflect not only census population figures but also other demographic factors, such as income, etc.	The construction traffic assignment is based on population densities in the areas that surround the project site, the distribution of the existing traffic volumes, and existing travel patterns that identify the logical travel routes to and from the project site. The *CEQR Technical Manual* recommends using existing travel patterns to help establish project generated vehicle assignments. The assignment in the EIS further refined this analysis by examining population data that identified the likely places where construction workers would be drawn from to work on the project. The traffic assignment is based on sound and standard traffic engineering procedures and data.	4.9.3.2.1
60.	Town of Mount Pleasant	Substantiate why the applicant believes that the traffic assignment pattern for employees will be the same for construction workers. This is not usually the case.	Since the construction assignment is based on existing travel patterns and population data it is logical to assume that the employee assignment would be similar. After operation, the employee traffic is a small component of the project, approximately 45 peak hour vehicles trips. This small amount of generated traffic would not be sensitive to small changes in the percent distribution of traffic (the results of the study would not materially change if the patterns were slightly different).	4.9.3.2.1

Item #	Commentor	Comment	Response	Section Reference
61.	Town of Mount Pleasant	The narrative discussing construction related trip generation inadequately describes the nature of the impacts created by the project on the surrounding roadway network. A much more clear and thorough description of construction truck trip generation and assignment is necessary. Currently, all construction truck trips are grouped together into a single category. From a practical operational perspective, truck trips will fall into two groups; truck trips delivering supplies and equipment to the site, and truck trips exclusively generated during the transfer of fill material from the site to the Kensico Aerator site. It is anticipated that regular delivery trips will occur either at the start of each work day, or irregularly throughout the day, while the fill transfer trips will occur throughout the day on a very regular schedule.	The EIS analyses did estimate the number of trucks that would be related to each activity and phase of construction of the project. This included estimates of the unique truck activities associated with the filling of the Aerators, versus more typical trucking activities supporting the construction of the UV Facility. The detailed truck data and distribution is contained in the traffic technical appendix of the Final EIS.	4.9.3.2.1
62.	Westchester County	The draft EIS notes that Walker Road would serve as the main access to the UV Treatment Facility. It should be noted that Walker Road provides access to Westchester County's Cerrato bus garage on an adjoining parcel on the Campus. The garage is a major base for the Bee-Line bus fleet and generates 232 bus trips on an average weekday. The majority of buses enter and exit the garage by passing through the Walker Road/Route 100C intersection. On an average weekday, approximately 52 buses leave the garage during the morning service peak (from 5 a.m. to 7 a.m.); the bus schedule changes periodically. As the planning for the UV facility proceeds, it will be critical that DEP contact the Westchester County Department of Transportation concerning traffic and circulation-related activities along Walker Road and the need for a traffic management plan. The final EIS should also specify that Walker Road must be kept cleared of dirt and other construction-related debris on a daily basis to avoid impacts on newly washed buses coming and going from the County facility.	As stated in the comment, the EIS notes the location of the County's bus garage immediately adjacent to the site. The analysis of on-street conditions and evaluation of potential project impacts considered the buses utilizing this bus garage, The reported number of buses leaving the garage that are stated in the comment are consistent with the field observations that were employed in the EIS analyses. The EIS identified off-street parking areas for construction workers and NYCDEP employees (after start-up of the facility), and the project design incorporates set-back vehicular entrance areas that would allow proper security for the site, and minimize spillbacks of queued vehicles onto Walker Road. These measures, along with identified traffic signal rephrasing mitigation measures, would eliminate any predicted traffic impacts along Walker Road. A NYCDEP liaison would coordinate communications with NYSDOT, the County and local representatives should any changes in traffic circulation along Walker Road be required, although none are anticipated at this time. In addition to the dust control measures/washdowns that will be applied to construction vehicles exiting the facility, NYCDEP will also require the contractor to clear construction-related debris on a workday basis or as otherwise directed by the Site Engineer. The Site Engineer may require removal or disposal work whenever, in his judgment, the debris or rubbish (or similar waste) interferes with the execution of the work, presents a fire or safety hazard, or renders the Site unseemly to the public or visitors to the Site.	4.9.3.2.1

Item #	Commentor	Comment	Response	Section Reference
			Roads in the vicinity of the Site will be cleaned as needed, to prevent the accumulation of soil, dirt or debris from work-related traffic and shall be washed with water to prevent the accumulation of particulates. The roads shall be cleaned as needed, but no less frequently than once weekly. The Contractor will provide a dedicated street sweeper truck for this purpose. Walker Road would be cleaned daily. Construction roads and, as needed, other areas within the limit of disturbance will be washed down with water as needed, but no less frequently than once daily, to prevent the accumulation of and to suppress dust. Exposed excavated surfaces will, as feasible, be sprayed with water to suppress dust.	
63.	Town of Mount Pleasant	How will the proposed shuttle bus operation work from off-site parking locations? As a practical matter, most construction workers arrive at the site very near the start of the work day. Will numerous shuttle buses transfer the hundreds of construction workers to the site at the start of the work day, or will fewer buses shuttle workers over a longer period of time.	The use of shuttle service to transport construction workers to and from off-site parking lots would only occur if the Croton project is also constructed on the Eastview Site. However, this scenario is not expected to occur in the future with NYCDEP's decision (after the Catskill/Delaware UV Facility Draft EIS was completed) to site the Croton project in the Bronx. Therefore it is unlikely that there would be a need for shuttle service because all the parking for construction workers for the Cat/Del UV project would be accommodated on-site. However, if it were necessary to shuttle construction workers, the contractor would be required to contract with a bus company, and most of the bus trips were estimated to occur early in the morning, before the commuter on-street peak hours. Since there would be no appreciable on-street parking areas to accommodate the workers, in order to gain access to the site on time, they would be required to use the designated off-site parking facilities under this scenario.	4.9.3.2.3
64.	Town of Mount Pleasant	The Draft EIS notes that the sites selected for off-site parking (Landmark, Westchester Community College, Home Depot) have excess parking and are willing to allow their parking lots to be utilized for construction worker parking. How would such an arrangement work? How will the Town enforce compliance? Is a Town approval required? What about periods of peak use at the facilities when their parking demand increases? Further clarification is required.	NYCDEP contacted all the owners of the private lots identified in the Draft EIS and all indicated there is available capacity and they would be willing to work with NYCDEP. These are privately owned lots and the agreement would be between the City (or its contractors) and these private parties and would not require approval from the Town. The property owners would have their private security force along with NYCDEP's police force monitoring parking operations to ensure that all agreements are properly and safely executed. Observations made in the field were used to determine the available early morning capacities, by limiting the areas for parking for construction workers based on the current peak accumulation of parking (which may occur after 8 AM) at these facilities.	4.9.3.2.3

Item #	Commentor	Comment	Response	Section Reference
Air Quality				
65.	Town of Mount Pleasant	Why were 4 intersections chosen for air quality modeling?	A total of 27 intersections were studied as part of the traffic impact analysis. The data from the traffic analysis was utilized to determine which intersections would be critical to the mobile source air quality modeling analysis (i.e., which intersections would represent a worst case scenario from an air quality standpoint). Based on guidance suggested by the United States Environmental Protection Agency (USEPA), the intersections were ranked in three categories; Level of Service, Total Traffic Volume and Project Increment Traffic Volume. Based on the results of these analyses, four intersections were selected for a detailed mobile source air quality impact analysis. These four intersections were expected to incur the highest degree of on-street air quality degradation during the construction period and project build scenario. Since these intersections would not experience predicted significant adverse air quality impacts (based on the results of the analyses performed for the EIS), then locations near any other roadway or intersection in the surrounding community would not be expected to experience significant adverse air quality impacts from the project. In addition, a screening analysis of the potential air quality impacts at additional intersections from an alternative traffic route (Option E) identified between the Eastview site and Kensico Aerators was also assessed for the Final EIS.	4.10.1
66.	Town of Mount Pleasant	Utilizing ambient air quality monitoring stations in New York City (or any other highly urbanized area) may inaccurately skew baseline air quality conditions. If the air quality is already identified as poor, then the project's contribution may not appear so significant. The air quality analysis in the Draft EIS used a Bronx monitoring station for particulate matter, a Mt. Vernon site for total suspended particulates, a second Bronx site for sulfur dioxide, and a midtown Manhattan site for ambient lead. Generally, central Westchester County (where the site is located) marks the location where a range of characteristics (including air quality) shifts from urban characteristics, to suburban or even rural. The basis for utilizing the monitoring locations set forth in the Draft EIS should be justified, or adjusted to reflect the sites suburban setting. Explain.	Potential impacts on air quality are determined by comparing the total predicted concentrations of each pollutant with applicable ambient air quality standards (state and federal). The total predicted concentrations reported in the EIS include measured background concentrations for affected pollutants as indicated in Table 4.10-3. The air quality data from these "urban" monitoring stations may be more likely to include sampling data with higher pollutant concentrations than those in more rural areas. Therefore, the use of this data would represent a conservative over-estimate of the total predicted concentrations if the data are used to represent a more rural area. There is a sulfur dioxide monitor at Mt. Ninham in Putnam County, but sulfur dioxide wasn't a critical pollutant in the analyses, and the Putnam County air monitoring site may be less representative for the project study area compared to monitors in NYC. Since there were no other nearby NYSDEC air quality monitoring stations near the project site , these conservative background levels from New York City were employed (where applicable) in the air quality impact analyses.	4.10.2.1

Item #	Commentor	Comment	Response	Section Reference
Noise				
67.	Westchester County	[T]he draft EIS indicates that proposed excavation activities may cause vibrations and that nearby locations, including the County Laboratory, are potentially sensitive to such vibrations. Because of the great public health, medical and forensic significance of the research conducted at the County Laboratory, it is imperative that that all vibrations be kept to a level where there will be no interference with the operation of this facility. Measures to ensure this result must be identified in the final EIS.	Measures to ensure that acceptable vibration thresholds are not exceeded at the County Laboratory are stated in the EIS. Almost all of the anticipated blasting for the UV Project would be at a substantial distance from the County Laboratory. As noted in the EIS, the main factors in rock blasting that affect vibration levels are charge weight and distance from blast area to sensitive receptor. Whereas distance cannot be altered, the charge weight may be controlled through the use of delays. Delays divide a charge into many smaller individual blasts, thereby reducing charge weight and, consequently, associated vibrations. Before blasting has commenced, facilities identified as sensitive receptors would be notified ahead of blasting activities. Monitoring would be conducted by a specialty contractor adjacent to the receptor during boring activities. All complaints received would be investigated thoroughly. In addition, the blasting ordinances of both towns would be followed.	4.11.3.2.1
Infrastructure				
68.	Town of Greenburgh	Sketch 1 illustrates the preferred location of a proposed sanitary sewer easement for the Town, through NYCDEP property. The applicant should review this and provide comments as necessary.	The approval to permit the Town to build a sewer line through NYCDEP property is out of scope of the environmental review for the proposed UV Facility. However, NYCDEP is currently in discussions with Town representatives and will continue to work with the Town on this issue.	4.16
69.	Westchester County	The draft EIS states that a direct connection of UV-treated water will be provided to the Town of Mount Pleasant water system. However, a direct connection to Westchester County Water District #3 is not discussed. Westchester County recommends that a direct connection to County Water District #3 should be provided. An indirect connection to the County District through a municipal system will not be sufficient.	The design of the proposed UV Facility would allow Westchester County Water District #3 to receive UV treated water through a municipal system.	4.16

Item #	Commentor	Comment	Response	Section Reference
70.	Town of Greenburgh	Sewer Easements – In order to mitigate potential adverse impact to the Greenburgh [sic] in the Knollwood area, this project must provide for sanitary sewer easements over the aqueduct.	Construction of the proposed UV Facility would not have a significant adverse impact on the Knollwood area infrastructure, particularly the sewer system. NYCDEP understands that portions of this area are not currently served by sewers. NYCDEP is proposing to connect proposed the UV Facility to existing sewers in the Town of Mount Pleasant and would not utilize sewers within the Town of Greenburgh. Providing sewer service to the Town of Greenburgh is not currently part of this project.	4.16.2.1.2.
71.	Town of Greenburgh	The Site Plan application does not address any impacts to existing infrastructure. NYCDEP should be asked if they intend to have any water, sewer, or storm drain impacts.	Please see the EIS, which is the appropriate document for presenting potential impacts. NYCDEP does not anticipate any impacts to infrastructure within the Town of Greenburgh as a result of this project.	4.16.3
72.	Town of Greenburgh	The design capacity of this facility may be as much as 2,400 mgd, which is approximately twice the current maximum capacity or safe yield of their water system, which is 1,200 mgd. Even allowing for future growth I find it puzzling that they are sizing the plant for double what they are currently at. This is especially true when we have been bombarded with "water conservation" as the explanation for the past 5 to 10 years of why their water usage has been in decline, thereby driving up our over per-capita penalties. I would like to here [sic] a better explanation as to this size discrepancy or what other future water tunnels they plan to bring to this site.	The current annual average yield of the NYC water supply system is about 1.29 billion gallons per day. The UV Facility will be designed to initially disinfect up to 2,020 million gallons per day (near-term), and up to 2,400 mgd ultimately. This initial design flow rate is based on the year 2045 low-end Maximum Day demand projection for New York City (1,820 mgd), as established by NYCDEP, and includes the Westchester County Maximum Day demand projection of 200 mgd. Provisions for receiving flow from the pressurized Catskill Aqueduct (see Section 5, Off Site Facilities of the Final EIS) and for future connections to the Kensico-City Tunnel (KCT) will be provided at the Eastview Site, to feed the UV Facility. The KCT is currently being considered for a capacity of 2,400 mgd to meet NYCDEP's estimated high-end future (Year 2045) in-City and upstate demands. The UV Facility would thus be required to ultimately treat up to 2,400 mgd.	4.16.3.1.1

Item #	Commentor	Comment	Response	Section Reference
73.	Town of Greenburgh	Their plan calls for several crossings of Route 100C with water tunnels and storm drain culverts. While it is understood that this is a State road, the impacts to traffic on this road or detours of traffic will have a significant impact to Greenburgh and its residents.	NYCDEP intends to install a treated water conveyance under Route 100C; NYCDEP could also potentially install a pressurized raw water conduit and a bypass line under 100C as part of the project. No new storm drain culverts are proposed as part of this project; instead, NYCDEP proposes to rebuild the existing culvert under 100C. Stormwater management would occur on the north parcel. The EIS states that under all 2008 Construction conditions (with or without the Croton project), tunnels and conduits will have to be dug under Route 100C, which will require closing part of this roadway on two occasions for periods on the order of two months each. During these time periods, NYCDEP will provide temporary roadway pavement alongside the permanent Route 100C roadbed to accommodate a comparable number of lanes of through traffic. This temporary roadway to carry diverted Route 100C traffic would require the approval of NYSDOT. The EIS indicates that such impacts during construction would be considered temporary adverse impacts. Recommended mitigation measures have been presented in Section 6 of the Final EIS, Mitigation of Potential Significant or Temporary Adverse Impacts.	4.16.3.2.1
Off-Site Facilities Modifications				
74.	Town of Mount Pleasant	Clarification is requested regarding the construction related impacts at the Kensico site. Where will construction worker parking take place, equipment and supply staging, etc. Will these areas be screened from views from Columbus Avenue?	Construction worker would park on NYCDEP property and/or along West Lake Drive. Equipment and supply staging is expected to be on NYCDEP property adjacent to work sites. No extensive screening is anticipated due to the relatively short nature of outside work disturbances at any discrete location.	5.1.1
75.	Town of Mount Pleasant	Where will trucks carrying fill material enter the Kensico site during the Aerator fill operation. Will a new construction entrance be created?	Trucks would enter West Lake Drive from Columbus Ave, and use entrances to the Aerators set back from Columbus Avenue near existing entrances to the sites.	5.1.1.5
76.	Town of Mount Pleasant	Describe the nature of the restoration and landscaping plan at the Aerators. Will the landscaping recently planted on the site remain in place?	The restoration and landscaping efforts at the Aerators would unfortunately require removal of some of the recent landscaping. The final landscaping plan would consider security needs, and plantings/vegetation would include the use of natural low maintenance vegetation.	5.1.1.5

Item #	Commentor	Comment	Response	Section Reference
77.	Town of Mount Pleasant	Further discussion is called for regarding air quality impacts resulting from the heavy truck traffic during the Aerator fill operation. Will trucks queue-up at the Aerator site for long periods with their diesel engines idling? If so, localized air quality impacts may result. Further clarification is required. This comment applies to the Eastview Site as well.	Detailed modeling studies of the potential air quality impacts from the on-site removal and transfer of materials, plus the on-street localized impact from the transport of excavated materials by diesel trucks, were included in the EIS. These analyses included all the major components of emissions, including the idling of trucks on-site. With respect to Kensico, the delivery and inspection of trucks delivering excavated material would be quite a distance from Columbus Avenue. After clearing security at the entrance, no significant queuing of trucks within the Aerator sites are expected. For the analyses performed for the on-site activities (which included numerous other sources of airborne emissions, including trucks from idling), no significant adverse impacts were predicted from the anticipated queuing activities and other concurrent on-site diesel operations. Based on these analysis results and the expected truck delivery operations to the Kensico Aerators, no significant air quality impacts on the surrounding community are expected.	5.1.3.2.11
78.	Town of Mount Pleasant	The Draft EIS notes that the construction sites will be screened with fencing. Define the type of fencing proposed. Given the fact that the “temporary” impacts associated with the construction projects may last up to 4 years, fencing should be attractive and well maintained.	Where fencing is required, it is expected that chain link fence would be employed. Cable barrier fencing will also be installed along portions of the site perimeter, including along much of the northern and western boundaries of the north parcel. Construction fencing will be chain link and 10 feet high. The contractor will be required to maintain the fence during the construction phases of the project. Fencing is provided not only as a security measure for the NYCDEP's water supply facilities but also to prevent public access to an active construction site. Cable barrier fencing will also be installed along portions of the site perimeter, including along much of the northern and western boundaries of the north parcel.	5.1.3.2.2
79.	Town of Mount Pleasant	How much tree removal is required?	Tree removal would be required in the vicinity of the Catskill and Delaware Aerators as needed to appropriately landscape the area after filling of the Aerators has occurred. Tree removal could also occur in the vicinity of the Catskill Aqueduct between the Lower Effluent Chamber and the Boat Hole. In order to pressurize this section of the aqueduct, extensive rehabilitation could be required, which would result in the loss of some trees in staging areas along the aqueduct. Further details regarding potential tree impacts at the Kensico Reservoir work sites are presented in the Final EIS.	5.1.3.2.2

Item #	Commentor	Comment	Response	Section Reference
80.	Town of Mount Pleasant	The primary traffic impact involves the filling of the Aerators. Approximately 200 heavy truck trips per day, 24 trips per hour or 1 trip every 2 ½ minutes will take place every work day for 3 to 6 months. This action will cause the Level of Service of numerous intersections to degrade or fail. This represents a serious adverse impact.	The EIS identifies potential adverse impacts that may result from the truck trips associated with the filling of the Aerators, and identifies potential mitigation measures to reduce such impacts. In the time period between the issuance of the Draft EIS and Final EIS, NYCDEP held meetings with the NYSDOT, Westchester County and local representatives to review the potential traffic mitigation measures that were described in the Draft EIS.	5.13.2.7
81.	Town of Mount Pleasant	The Town must be included in the truck route selection process. Truck routes must be evaluated regularly and adjusted, if necessary. The Mt. Pleasant Department of Public Works and Police Department must have discretion to adjust truck route paths and schedules to address local concerns. For example, during periods when school children are commuting to and from school, truck trips should be suspended.	The Draft EIS did not identify a preferred truck route, but rather identified possible route options for the filling of the Aerators. In the time period between the issuance of the Draft EIS and Final EIS, NYCDEP held meetings with the NYSDOT, Westchester County and local representative to review the potential truck routes between Eastview and Kensico for filling the Aerators. As part of the Final EIS, NYCDEP has analyzed two additional route options for the filling of the Aerators with excavated fill from the Eastview Site: • Option D (a circular route) - all trucks destined to Kensico from Eastview would make a left turn from Grasslands onto Bradhurst to Lakeview Avenue to Columbus to West Lake Drive. Return trips to Eastview would make a left turn from Lakeview onto Commerce Street with a right turn on Legion, followed by a right turn onto Grasslands Road. • Option E - all trucks destined to Kensico from Eastview would use Walker Road to Dana Road to Route 9A to Route 141 to Kensico Road to Columbus Avenue to West Lake Drive. On the return trip, trucks would make a right turn onto Columbus Avenue to Kensico Road to Route 141 to Route 9A to Dana Road to Walker Road. Option D reflects a reasonable direct route that minimizes left turns for trucks crossing at unsignalized intersections. Option E reflects a route that is on State and County roadways, but would require a much longer travel time per trip (when compared to Option D, about 30 minutes longer per truck trip back and forth from the Eastview to the Kensico sites). While the total amount of excavated material transferred to the Kensico site would remain the same among the five options, Option E would likely require the contractor to employ additional trucks due to the longer trip distances and travel times in comparison to routes for Options A through D. Option E would also likely result in a longer time period for transporting excavated material from the Eastview site to the Kensico site, and thus, elongate the time period that the community is subjected to the trucking activities from this component of construction. In consideration of a) on-street	5.1.3.2.7

Item #	Commentor	Comment	Response	Section Reference
			safety, b) minimizing the duration of impacts on the local community that are related to the trucking of excavated material to the Kensico site, and c) Filtration Avoidance Determination (FAD) time restraints for completing construction of the project, NYCDEP has specified a preferred route (Option D), and will direct the contractor to utilize this route, unless circumstances require a temporary alternate route. Mitigation measures that would need to be applied for the preferred route (Option D) and various other routes are also identified in the EIS and the site preparation contract. These mitigation measures would ensure the safety of the general public, including school children, while these activities are underway.	
82.	New York State Department of Transportation	The potential route of 100C to 9A to 141 to Commerce Street to Kensico Road to Columbus Avenue to West Lake Drive needs to be investigated further. This route will keep the trucks on major State and County Roads as opposed to residential streets.	An analysis of this Route is included in the Final EIS, and potential mitigation measures that would be required should this route (Option E) be used was investigated. See response to comment 81.	-
83.	Town of Mount Pleasant	The earlier comment regarding pavement infrastructure applies in this instance as well. Further evaluation is required before a conclusion can be reached that the project will not result in adverse impacts to existing roadway surfaces.	See response to comment 56	5.1.3.2.7
Mitigation of Potential Impacts				
84.	Town of Mount Pleasant	A very specific pavement infrastructure mitigation plan needs to be presented. Such a plan would describe how pavement, curbs, rights-of-way improvements, etc., damaged during the project will be restored.	See response to comment 56	6

Item #	Commentor	Comment	Response	Section Reference
85.	Town of Mount Pleasant	A public safety mitigation plan should be provided. The plan should link into the transportation mitigation measures identified, but should also address localized issues of significance, such a pedestrian impacts, school impacts (including relocation of school bus stops), emergency service modifications, disruptions to communications, etc.	All MPT plans developed as part of the project would take into consideration pedestrian, school and emergency service related issues. A NYCDEP liaison would coordinate with the Towns of Mount Pleasant and Greenburgh, NYSDOT, the County and local citizen groups to respond too and address issues as they arise**.** The identified NYCDEP liaison would serve as the primary point of immediate communications to ensure that safety issues are promptly addressed during the construction phase. A list of primary points of contact for the towns, county and state representatives will also be requested by NYCDEP to ensure that the appropriate representatives are communicated with coordinating and addressing construction related issues.	6
86.	Town of Mount Pleasant	The discussion of mitigating project impacts at the Eastview Site is inadequate. The narrative fails to address any of the specific mitigation measures that are proposed to help preserve the existing neighborhood character. As noted earlier, the surrounding land use character reflects institutional and office park uses. The site however, is essentially vacant and undeveloped. When the site is developed that existing land use relationship will change. The most obvious measure to mitigate this impact is to provide landscape screening so that some sense of the site's undeveloped character remains in tact. Further discussion is warranted.	The EIS noted that there would be potential adverse impact on neighborhood character due to off-site construction related vehicles under the scenario that the Croton project is constructed at the Eastview Site at the same time the UV Facility is built. These impacts are not related to on-site operational conditions. However, landscape screening would be provided as part of the final design for the UV Facility.	6.1.2
87.	Town of Mount Pleasant	The Draft EIS concludes that adverse traffic impacts resulting from the project are unavoidable, will persist for years and will be particularly acute during a 16 month peak construction period. Mitigation measures have been designed to restore traffic conditions to the Future No-Build (FNB) condition or Level of Service D at worst. Proposed mitigation measures include 11 new traffic signals, re-striping 4 intersections, retiming or replacing traffic signals at 13 intersections and physically reconstructing the intersection geometry at 7 intersections. By any measure, this represents an extraordinary degree of	Comments noted. The EIS identifies all potential significant and temporary adverse impacts on traffic that may result from the construction and operation of the UV Facility. In the time period between the issuance of the Draft EIS and Final EIS, NYCDEP held meetings with the NYSDOT, Westchester County and local representatives to review the potential traffic mitigation measures that were described in the Draft EIS. In addition, a selection of a preferred route during the main off-site trucking activities (during the filling of the Aerators) was determined to help refine the determination of the appropriate mitigation measures NYCDEP received comments on the proposed mitigation measures, and is providing additional information to the NYSDOT and County for measures that would be employed on roadways under their respective jurisdictions.	6.1.3

Item #	Commentor	Comment	Response	Section Reference
		mitigation. DEP is not committing to undertake all of the mitigation measures. They have offered to demonstrate how mitigation can take place. The Draft EIS indicates that NYCDEP will consider other traffic mitigation techniques (e.g. the use of traffic control officers, traffic cones, variable message signs, etc.) if approved by the governing roadway entity, to mitigate impacts. Given the demonstrated significance of these impacts, and the consequent impact on the residents and businesses of the Town of Mount Pleasant, the Town request that it be involved in all decisions regarding traffic mitigation, even if the decision rests with another agency. It is recommended that a traffic impact mitigation team be created. Such a group might consist of representatives from NYCDEP, NYSDOT, Westchester County DPW and Department of Transportation, as well as the Town of Mount Pleasant DPW and Police Departments. This group would convene regularly (weekly), or as often as necessary to address specific traffic impact and mitigation issues.	As discussed above, instead of computing the re-optimization of the signal via the actuation process (which is a typical analysis approach from project's undertaking comparable studies in Westchester County), the NYCDEP applied a rigorous methodology that did not take benefit of the natural, re-optimizing of the signal in the "With the Project" scenarios, and only demonstrated such benefits in the mitigation section. The EIS has identified locations where signal retiming could mitigate the predicted impacts, and also, locations where either uniformed police presence or flag-people are required. A NYCDEP liaison will work with Town to ensure that the Town resources are not overly burdened by the construction of the proposed UV Facility. In addition, should deviations from the preferred truck route for filling the Aerators be required, the necessary mitigation measures have been identified, and the NYCDEP will accommodate requested changes in the trucks filling the Aerator routes from the Town if the preferred route cannot be utilized. In addition, NYCDEP will discuss or meet with the local, county and state representatives as necessary to address traffic and mitigation issues.	

Item #	Commentor	Comment	Response	Section Reference
88.	Westchester County	The identification and implementation of traffic mitigation measures proposed for the project including the definition of trucking routes will require detailed agency meetings. DEP should consider using major roads, not residential streets, for truck routes. One potential route is Route 100C/Route 9A/Commerce Street/Kensico/Columbus Avenue/ West Lake Drive. This route would keep trucks on major State highways and County roads. Traffic mitigation must be done to alleviate the projected construction impacts with truck access prohibited in peak hours. The proposed mitigation at the Bronx River Parkway and Virginia Road is not applicable due to actuated signal computer control and would significantly affect the queues on the Bronx River Parkway.	As discussed in response 83, NYCDEP has analyzed this additional route in the Final EIS. There are residential uses also along this much longer route. See response to comment 81. The assessment of traffic impacts from construction related activities addressed the potential impacts during commuter peak hours. For the critical signalized intersections with commuter traffic that would adversely impacted by the construction vehicles, the calculated level of service with practicable mitigation measures would be comparable to the "without the project" scenarios. At un-signalized intersections, temporary MPT plans would mitigate construction impacts during the most active on-street trucking periods. Therefore, with the proposed mitigation measures, the proposed UV Facility would not require prohibition of trucking activities in peak hours. As discussed above, instead of computing the re-optimization of the signal via the actuation process (which is a typical analysis approach from project's undertaking comparable studies in Westchester County), the NYCDEP applied a rigorous methodology that did not take benefit of the natural, re-optimizing of the signal in the "With the Project" scenarios, and only demonstrated such benefits in the mitigation section.	6.1.3.1
89.	New York State Department of Transportation	Part of the mitigation of the construction impact will be a restriction of truck traffic during peak hours. Please submit for our approval a proposed schedule of operation. This schedule should be based on providing an acceptable level of service on the proposed route.	As discussed in response 89, with the proposed mitigation measures, the proposed UV Facility would not impact level of service during commuter hours, and therefore, would not require prohibition of trucking activities in peak hours.	6.1.3.1
90.	Town of Mount Pleasant	As previously noted, localized air quality impacts may result from truck queuing at either Eastview or Kensico during the fill operation. Proper scheduling and sequencing may serve to mitigate this situation.	As discussed in response to the comment 77, no significant localized air quality impacts are expected from the truck operations at either the Eastview or Kensico operations. In terms of ensuring that security measures and a timeliness completion of the construction efforts, NYCDEP and its contractors would continue to oversee construction activities to ensure proper scheduling and sequencing of material transfer activities.	6.1.4

Item #	Commentor	Comment	Response	Section Reference
91.	Westchester County	The draft EIS appropriately identifies the pre-Revolutionary Hammond House as a significant historic resource in Westchester County. The final EIS should include a suitable plan for the preservation of Hammond House that reflects the advice and recommendations of the appropriate New York State agencies and other resources.	Should Hammond House need to be relocated in the future, NYCDEP will consider the advice and recommendations of the appropriate agencies for the preservation of Hammond House.	6.1.6
92.	Town of Greenburgh	The Town recommends further exploration of the potential for off-site mitigation to address the adverse impacts of the extensive tree cutting (297 trees for Alternative A, and 302 for Alternative B), proposed within the Town of Greenburgh, including but not limited to, the potential for additional off-site mitigation in the Saw Mill River area beyond that which is outlined in Section 6.1.7.3.4.	In the time period between the issuance of the Draft and Final EIS NYCDEP has refined its proposed off-site tree replacement mitigation program, as described in Section 6.1.7.	6.1.7
93.	Town of Mount Pleasant	Information should be provided on specific wildlife and plant species that will be impacted as a result of the proposed action. The applicant has identified broad scope impacts, but data should be provided on specific focal target species that may be considered environmentally sensitive.	Section 4.14, Natural Resources, of the Final EIS provides a detailed summary of the plants, animals and habitat communities found on the Eastview Site and the impacts to them resulting form the proposed UV Facility.	6.1.7.2
94.	Town of Mount Pleasant	The applicant has presented a very concise and well thought out plan for mitigating the proposed impacts to existing environmental features that include reforestation plans for upland forested areas, shrubland and old field habitats, and conversion of disturbed wetland areas to higher quality and more diverse wetland habitat. What is needed is the background data to support the proposed mitigation.	The proposed mitigation was developed based upon the predicted impacts to various habitats at the Eastview Site which are detailed in Section 4.14, Natural Resources. The Final EIS includes an appendix that provides the detailed backup for the proposed habitat mitigation.	6.1.7.3

Item #	Commentor	Comment	Response	Section Reference
95.	Town of Mount Pleasant	It would be helpful if the applicant could provide background information on alternatives that would reduce the amount of proposed impacts to wetland resources and forested habitat at the proposed Eastview Site. For example, could the UV Facility be placed within the northwestern corner of the property or within sections of the southwestern corner to avoid or reduce further the impact to wetland resources? It is not entirely clear as to whether other alternatives were evaluated in an effort to avoid wetland impact. Due to the scope of the facility and the existing topography, is it possible to reduce the visual impact of the structure by working with existing topography.	Section 7, Alternatives of the Final EIS provides a summary of why the Eastview Site is preferred by the NYCDEP along with a description of the potential build-out of the site over the long term that affects the positioning and construction of the proposed UV Facility. No Action scenarios and a reasonable range of alternatives are addressed which might mitigate or lessen the potential significant adverse impacts predicted to occur as a result of the proposed action. In addition to the hydrology limitations, the proposed UV Facility was located east of Mine Brook on the north parcel to: (1) allow for operational flexibility; (2) allow for potential future connections the KCT; (3) facilitate connection to a Catskill/Delaware water treatment plant, if it were to be required in the future; and (4) minimize construction costs and environmental impacts.	6.1.7.3
96.	Town of Mount Pleasant	The 3 acres of proposed wetland impact will be mitigated at a minimum of 2:1 replacement ratio. The applicant has provided an extensive plan for on-site mitigation of approximately 7.3 acres that combines several stormwater management improvements as part of the design. On-site mitigation should be the preferred option.	The proposed 7.3 acres of wetland mitigation is considered on-site mitigation with approximately 1.8 acres occurring on the north parcel and approximately 5.5 acres occurring on the south parcel. This mitigation occurs within the same stream corridor and watershed that the proposed impacts occur in. The stormwater management improvements associated with the proposed wetland mitigation plan is part of an innovative approach to managing storm runoff from the project site in combination with wetland enhancement and creation that the NYCDEP has successfully applied elsewhere.	6.1.7.3

Item #	Commentor	Comment	Response	Section Reference
97.	Town of Mount Pleasant	Wetland mitigation measures that have been presented are quite aggressive and will require a substantial effort on the part of the applicant to guarantee success. I request that the applicant provide more detailed background information on each specific wetland mitigation measure to be implemented. The details to be provided should include site plan layouts, grading, planting plans, species, size and quantities, detailed water budget that demonstrates hydroperiod for wetland areas, erosion control measures, construction sequence details, and maintenance and monitoring protocols that will be established. I would suggest the same details be provided on reforestation and tree planting mitigation measures.	In the time period between the issuance of the Draft and Final EIS NYCDEP has refined its proposed natural area restoration and mitigation program, as described in Section 6.1.7. The reforestation, planting plan species size and quantities are described in Section 6.1.7 of the Final EIS. The final grading plans and construction details will be developed in conjunction with the contract documents. These mitigation measures are based upon NYCDEP's extensive experience in restoring and enhancing natural systems. A monitoring and maintenance plan would be developed for the proposed mitigation measures. Monitoring and maintenance plans under the responsibility of the contractor, are typically developed to cover a period of three years. All habitat mitigation sites that occur on NYCDEP property would be periodically monitored for invasive species, animal browsing, and plant die off. Any significant problems encountered would be corrected by the NYCDEP.	6.1.7.3
98.	Town of Mount Pleasant	The restoration and re-creation of specific habitats will require extensive site preparation and disturbance. The efforts used to eradicate invasive plant species and existing seed stock within the soil substrate should be specified. The methods for preparing the mitigation areas need more detailed information.	See response to comment 98.	6.1.7.3
99.	Town of Mount Pleasant	Once mitigation areas have been planted, it is not clear how monitoring and management for invasive plant species will be accomplished. Creation of floodplain forest, scrub/shrub wetlands, grasslands require years to become established. I recommend that a minimum of a 10-year monitoring and maintenance program be established for each specific mitigation effort.	See response to comment 98.	6.1.7.3
100.	Town of Mount Pleasant	Specific management protocols should be provided that demonstrates how mitigation areas will be protected from deer and rodent browsing, and other natural events, such as aggressive weedy species encroachment. Items to address include the use of repellents and other permanent means of protection such as fencing, etc.	Specific management protocols will be provided in the detailed contract plans.	6.1.7.3

Item #	Commentor	Comment	Response	Section Reference
101.	Town of Mount Pleasant	The proposed mitigation incorporates several storm water improvements. It is not clear how these measures have been designed within the wetland area so that no impact will occur to existing wetland hydrology. A program of monitoring wells should be established to examine potential ground water impacts. If storm water practices will be employed within these areas, the selection of plant materials and soil substrate is a critical component. These details should be provided for the proposed wetland mitigation areas.	An extensive network of groundwater monitoring wells has been established on the Eastview Site for both the proposed UV Facility and Croton project projects. A detailed groundwater model was developed for the UV Facility Draft EIS (see Section 4.15, Water Resources) that described project related impacts to groundwater and surface water hydrology. Section 4.14, Natural Resources contains a detailed description of the impacts to project site wetlands resulting from changes to groundwater and surface water hydrology from the proposed UV Facility. The stormwater improvements proposed in conjunction with the wetland mitigation plans were developed to replace wetland hydrology lost due to project related impacts to groundwater and surface water hydrology. The selection of plant materials for the proposed wetland mitigation areas is described in Section 6.1.7 of the Final EIS.	6.1.7.3
102.	Town of Mount Pleasant	The Town of Mount Pleasant Arborist should be involved in all pre-construction tree protection activities, including the installation of protective fencing, etc. The Arborist for the Town of Mount Pleasant would be involved in all pre-construction tree protection activities, including the installation of protective fencing.	As discussed in response to the comment on 79, no significant localized air quality impacts are expected from the truck operations at either the Eastview or Kensico operations. In terms of ensuring that security measures and a timeliness completion of the construction efforts, NYCDEP and its contractors would continue to oversee construction activities to ensure proper scheduling and sequencing of material transfer activities.	6.1.7.3.1
103.	Town of Mount Pleasant	Prior to implementing the off-site re-forestation program, the previous comment regarding the viability of other Eastview projects should be addressed. If the Croton plant will not be built at Eastview, then on-site re-forestation should be undertaken in the area formally reserved for that project.	If the Croton project is not built at the Eastview Site, on-site reforestation would still not be a viable option due to possible future site needs such as the Cat/Del Filtration Plant. The disturbed but undeveloped portion of the Eastview Site (generally west of Mine Brook) would be mitigated with a shrubland/grassland community which would provide improved habitat over the existing successional shrubland that is dominated by multiflora rose. Future adverse impacts to natural resources, in the form of tree loss, would be avoided by not planting trees in the proposed Croton project footprint should the Cat/Del filtration plant be constructed.	6.1.7.3.1
104.	Westchester County	A relatively large detention basin is located adjacent to the County's Cerrato bus garage. The final EIS should identify, discuss and mitigate any impacts, during construction and once operating, that the UV facility may produce on the County detention basin. Every effort should be made to comply with County policies on stormwater management as described in the New York State Stormwater Management Manual and the New York State Manual on Erosion and	Based on the location of the on-site construction activities, no stormwater runoff from the onsite activities is expected to drain to the detention basin adjacent to the County's bus garage. The perimeter of the entire construction site shall be secured and a Stormwater Pollution Prevention Plan along with sediment and erosion control techniques will be implemented in compliance with Westchester County and New York State Requirements. Furthermore, all construction vehicles leaving the site shall be washed down and all catch basins along Walker Road shall be protected to minimize any impacts to the County detention basin. Upon completion	6.1.7.3.5

Item #	Commentor	Comment	Response	Section Reference
		Sediment Control.	of construction all bare areas shall be restored with vegetation and a stormwater collection and management system shall be implemented for the paved areas and buildings. Therefore no impacts are anticipated to the County's detention basin during facility operation.	
105.	Westchester County	[T]he draft EIS states that impacts to natural resources at the Kensico Reservoir and Taconic State Parkway work sites cannot be quantified due to the level of detail currently available. The text states that such information will be provided in the final EIS. We request that this information be provided prior to the close of the comment period on the draft EIS to enable adequate public review and comment.	The Final EIS includes additional documentation on the maximum expected impacts on natural resources at the Kensico Reservoir and Taconic State Parkway work site. These additional quantified potential impacts are within the worst-case scenarios that were projected in the Draft EIS.	6.2.4
Alternatives				
106.	Town of Mount Pleasant	The discussion of traffic impacts resulting from the construction of the UV plant at the Kensico Reservoir site fails to address the most significant impact issue (from a community-wide perspective). The enormous impact created by the proposed action to the local roadway network resulting from filling the Aerators (transporting fill from Eastview to Kensico) is not addressed. If the Kensico site were selected, this identified adverse impact would be avoided. This issue warrants a much more detailed discussion. The same comment applies for the Hillview site.	Additional text has been provided in Sections 7.2.2.2.5 (Kensico) and 7.2.2.3.6 (Hillview) to note that the trips associated with the filling of Aerators would not occur under these alternatives. While there would be a requirement to excavate and removal soil from the Kensico site if the UV Facility would be constructed at that location, there would be less soil removal from the construction site if the UV Facility was constructed at Kensico.	7.2.2.2
107.	Town of Mount Pleasant	A number of site layout comments have been delivered to NYCDEP by the Mount Pleasant Planning Board in conjunction with the site plan review. These comments are incorporated herein by reference.	These comments have been addressed, and submitted to the Town as part of the Site Plan review.	7.2.5
Regional Impacts & Irreversible & Irretrievable Loss of Resources				
108.	Town of Mount Pleasant	The discussion of unavoidable traffic impacts should include the discussion of impacts to the pavement infrastructure.	Based on the analyses performed for the evaluation of impacts on the pavement infrastructure, no adverse impacts were predicted. See response to comment 56.	8.2