

**RESPONSE TO COMMENTS ON THE
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
CROTON WATER TREATMENT PLANT**

June 30, 2004

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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 #	Comment Number	Comment	Response	Section Reference
<i>Procedural Matters</i>				
1.	15, 141, 142, 689	Comments stated that SEQRA and CEQR require NYCDEP to choose alternatives that are consistent with social, economic and other considerations to minimize or avoid adverse environmental effects. NYCDEP is in violation of this directive in that it has not sought to minimize the environmental impact in choosing the design of this plant.	Environmental impact considerations were a large part of the planning for the design of this project as is evidenced for example by the selection of the treatment process. The process changed from Diatomaceous Earth to Dissolved Air Flotation (DAF) in 1998 largely to reduce the site's footprint. The design changed again in 2000 to stack the filters on top of the DAF to further reduce the footprint. This second design change made it feasible to consider more site alternatives, which include the Eastview and Harlem River Sites. The full compliment of alternatives for this project, which include engineering design and siting alternatives as summarized in the DSEIS fully meets the SEQRA and CEQR obligations. A range of alternatives is included that would lessen or mitigate potential significant adverse impacts that permits a comparative assessment of sites that would lessen or mitigate potential significant adverse impacts.	3.3.
2.	28	Future EPA regulations will require unfiltered water to have two disinfectants.	Chlorination alone does not control the protozoan parasite <i>Cryptosporidium</i> . It is the intention of NYC to filter the water, and to use ultraviolet and sodium hypochlorite as disinfectants.	3.3.2.
3.	31, 57, 62, 63, 163, 164, 480, 523, 692, 803, 968	NYCDEP is violating SEQRA and CEQR. The public does not have all the information needed to review the DSEIS. NYCDEP should withdraw the document and only resubmit when all the information is available. NYCDEP also has not provided the various studies cited in the report, as required by SEQRA/CEQR. The provision for supporting data and studies to be provided at repositories is required by SEQRA and CEQR. This is a violation and impedes the public's ability to review the document. There are numerous legal precedents supporting this contention. NYCDEP also has been negligent in responding to FOIL requests. The DSEIS therefore is incomplete.	Studies cited in the Draft SEIS were footnoted throughout the documents. The documents that were relied upon for the environmental impact assessment are included in the SEIS, its appendices, or are publicly accessible. For ease of access, the Final SEIS will add more details from some of the reports that were specifically mentioned by commenters. A SEIS need not be encyclopedic or encompassing of all information that can be otherwise readily obtained, especially pertaining to information outside of that needed for the environmental review. FOIL requests have been met.	
4.	50, 229	NYC law does not allow putting a pumping station that doesn't serve a locality and yet this project has pumping stations being installed in numerous locations. This is a segmentation issue.	There are no pumping stations associated with this project that would be built outside the water treatment plant site. Please reference the SEIS sections on Zoning for a discussion regarding the relevant sections of the New York City Zoning Resolution.	5.2.3.1.

Item #	Comment Number	Comment	Response	Section Reference
5.	55, 56, 226, 852	There is no discussion of alienation and none concerning the memorandum of understanding, which should be a part of the project and should incorporate storm water pollution plans. NYCDEP must disclose costs and plans associated with this. No discussion of Center Creek was included. Were fines paid? Items brought up in the legislation and in the MOU were not discussed in the SEIS.	The purpose of the SEIS is to assess the potential environmental impacts of placing the Croton WTP at the three proposed locations. The response to the alienation issue is discussed below under the heading "Park Alienation." Controversies about other projects are beyond the Scope of this SEIS.	6.2.3.1.2
6.	161, 233	Some unions are in favor of a binding labor agreement that guarantees a percentage of workers at the Mosholu Site are comprised of Bronx residents.	Comment noted	
7.	141, 170, 174, 191, 973	There must be a commitment that all \$243 million of the promised funds go to projects in Bronx, and further that these funds would not be used to replace existing city parks funding for capital or operating projects in the Bronx. In addition, a schedule for annual incremental funding should be included.	If the WTP is built at Mosholu the funds will be dispersed in a manner so as to improve parks and quality of life to parks across the Bronx. Initially \$43 million was committed as part of the proposed project at Mosholu, as specified in the 1999 City Council Resolution. The additional \$200 million would, likewise, be dedicated to improve parks and the quality of life derived from parks across the Bronx. These Bronx park projects should be constructed within five years. Additionally, the City commits that these funds will not be used to replace existing City park funds for capital or operating projects in the Bronx.	6.5.3.1.
8.	188, 313	All legal means will be used to challenge the taking of park land.	Noted	
9.	262, 272	Mayor Bloomberg's statement that the EIS is not going to stop the construction in Mosholu does not suggest an unbiased CEQR review.	NYCDEP has prepared an unbiased environmental impact assessment of the three alternative sites	
10.	478	NYSDEC issued an opinion that material within the EIS is the domain of the public and not of the lead agency. Drinking water in NYS is not the domain of private ownership but rather under the administration of state and local government.	Noted	
11.	601	The NYCDEP has been negligent in exploring filtration alternatives, protecting the watershed, addressing serious infrastructure problems, and proving the need for filtration. The NYCDEP therefore should renegotiate the Consent Decree.	NYCDEP has conducted numerous peer-reviewed studies to determine whether filtration may be avoided. Each of these has concluded that the Croton system should be filtered. NYCDEP is engaged in land acquisition as part of a multi-barrier approach to water protection. Additionally, the NCA is being inspected and proposed to be rehabilitated. The purpose of the environmental review is to inform a decision regarding site selection. There is no information that has convinced the NYCDEP that grounds exist to reopen negotiations on the need to filter the Croton Supply.	2.3.1.

Item #	Comment Number	Comment	Response	Section Reference
12.	826, 887	<p>Our city forefathers stated one key reason for not building the plant at the Eastview Site is that the City will not have to pay fines if they build at Mosholu. This is not true. The City does not have to violate the Consent Decree, they could choose Eastview as the preferred site and no fines would be levied. Either way, the fact is that the City is violating the Consent Decree by not applying for local approvals on the Eastview Site. This was supposed to be begun in April 2003. Please make public the Consent Decree and its Supplement so the public can evaluate the “fine” statements by agency personnel.</p>	<p>It is true that no fines would be levied if the Consent Decree schedule were complied with at any of the three sites under consideration. The NYCDEP filed a local site plan approval application in April of 2003 with the Town of Mount Pleasant in accordance with the December 12, 2001 Supplemental Consent Decree. The NYCDEP sent a letter to the Town of Mount Pleasant February 2004, requesting that the review of this application be expedited. The U.S. Attorney filed a claim against the City after April of 2003 because the City did not choose a preferred site between the then-current alternatives: the Eastview Site or the Harlem River Site, as was required by the Consent Decree on April 30, 2003. The City did not comply at that time because it felt that the Legislative Approval of Alienation for the Mosholu Site was imminent. Subsequent to the Legislative Approval on June 20, 2003, negotiations were reopened with the federal and State Regulators. The Alienation Legislation required the consideration of three sites in a SEIS: the Eastview Site, the Mosholu Site, and the Harlem River Site. A revised Supplemental Consent Decree is still under review by the agencies. It will be made available to the public as soon as it is completed.</p>	
13.	827, 828	<p>In April 2003, the City filed the 2003 DEIS for the Croton WTP for two sites as required by the Supplement to the Consent Decree – the Harlem River and the Eastview Sites. The DEIS did not choose a preferred site. The Harlem River ULURP process was halted in July 2003. It was supplemented in August 2003. At that time, the city re-added the third site – the Mosholu Golf Course. Even though the city did get an alienation bill, they never got “state legislation authorizing construction.” The DSEIS did not choose a preferred site. If the City was making a serious review, it would have commenced local site approval for the Eastview Site, and ULURP for the Harlem River Site as required by the Consent Decree.</p>	<p>The NYCDEP did submit a local Site Plan Approval application for the Eastview Site. The NYCDEP provided funding for the Town of Mount Pleasant to review this plan, and received and responded to comments. The Town suspended its review of the Site Plan Approval subsequent to the initiation of the SEIS, but NYCDEP recently requested that this review be re-initiated. The ULURP for the Harlem River Site had to be suspended because the City rules require that a decision on the application must be made within approximately seven months of filing. NYCDEP felt it would be illogical to expect the City Planning Commission to make findings on a site when two other sites are under simultaneous consideration. The Revised Supplemental Consent Decree will consider the impact on schedule of having to resubmit the ULURP for the Harlem River Site.</p>	

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14.	834	<p>Why is NYCDEP only able to meet or complete one project - the Croton Water Treatment Plant? Why is the Croton WTP the only binding federal court Consent Decree the NYCDEP is following? Explain why the NYCDEP is not covering Hillview Reservoir as agreed to in the Watershed MOU (at the same time NYCDEP agreed to filter the Croton). Explain why the NYCDEP is not abating CSOs, and plan to announce you are not building any more CSOs.</p>	<p>NYCDEP has met, and will continue to meet, its legal commitments. Changing treatment, supply, and distribution scenarios for the Catskill Delaware system have altered the City's plans to cover Hillview Reservoir. These new plans must be approved by the State.</p>	
15.	843	<p>In NYC parkland any facility in a park is one of two types: either it is available to the public, or it is a concession based facility. Based on the assumption that Van Cortlandt Park must be restored to park use after construction, the following question remains unanswered in the DSEIS: will the area above the facility be available for the public use, or will it be concession facility? The community has been told that the land is not being alienated from the Parks Department, so it remains under the Parks Commissioner's control. If it will be available for public use, please list the hours and types of uses allowable. If it will be a concession, please provide a copy of the potential contract and monthly rental fees in the DSEIS. Discussed in the SOW and not completed in the DSEIS.</p>	<p>The land at the Mosholu Site would be alienated from Parks if the Mosholu Site is selected. A Memorandum of Understanding (MOU) between NYCDPR and NYCDEP will allow Parks to operate and maintain the golf concession. The future use of the driving range would remain a concession, as it is today. The agreement between NYDPR and the concessionaire is not part of the scope of this proposed project. The MOU between NYCDPR and NYCDEP will be made publicly available upon its completion.</p>	<p>6.2.3.1.2. & 6.5.3.1.</p>

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16.	844	<p>If NYCDEP proposes to restore Van Cortlandt Park to parkland, then it is only fair to put the above ground related facilities related to the WTP outside the park. The chemical fill building, the arrival and receiving building, and employee parking, can be off sited, and still be in close proximity to the WTP. For instance, the two utility buildings can be built alongside Jerome Avenue, or even in the land across from the Mosholu Golf Course. A series of underground pipes and tunnels could convey the materials needed. As stated in the 1999 EIS, employee parking should be underground. Otherwise, employee parking could be a newly built structure off-campus (so to speak), enabling the local economy to benefit from the increased parking revenue or pedestrian traffic. Not only would this spur economic development in the area, but it would also allow the park to remain a park. If, on the other hand, the land is under the control of the NYCDEP, section 11-13 requires a land use review. Discussed in the SOW and not completed in the DSEIS.</p>	<p>Just to clarify, the land on which the NYCDEP facilities would be built would be alienated, but the MOU mentioned above would allow NYDPR to control the golf concession. NYCDEP did evaluate moving the facilities off site. This led to the plan to pump residuals off site and to perform some of the staff functions at other NYCDEP facilities. The chemical unloading facility was determined to be best done near the storage tanks on the WTP site to insure security and public safety.</p>	6.2.3.1.2. & 6.5.3.1.
17.	847	<p>Mosholu is not a manufacturing zone and you have not applied for a Special Permit on the use of parkland. (SDEIS INTHIS p. 26).</p>	<p>We agree that Mosholu is not zoned for manufacturing. It is currently mapped Park, for which no zoning or “special permit” exists.</p>	6.2.2.1.2.
18.	2, 456, 806, 807, 908	<p>Several comments referred to the need to evaluate alternatives to filtration. Despite NYCDEP saying that the Consent Decree mandates filtration, an alternatives analysis must be included per SEQRA. NYCDEP has narrowly defined the purpose of the DSEIS to such an extent as to avoid discussion of any other alternative. The Consent Decree does not shield NYCDEP from that mandate. Also, the Consent Decree specifically allows parties to reopen consent order for amendment.</p> <p>Some specific points that were raised were:</p> <ul style="list-style-type: none"> • ESSP [Extended Special Studies Program] is not included in DSEIS and its conclusions not substantiated. • Does not provide supporting data for NYCDEP’s claim that no-action alternative is not viable. • Aeration is not evaluated for treating color problems. • Alternative methods for treating turbidity, microbial contaminants, and DBPs are not considered or presented. 	<p>The Draft SEIS reviews siting alternatives. NYCDEP has conducted numerous peer-reviewed studies to determine whether filtration may be avoided. Each of these has concluded that the Croton system should be filtered. A full discussion that states the NYCDEP’s reasons for building the WTP was presented in Section 2 of the Draft SEIS. The ESSP was published in 1997 and made publicly available at that time. It evaluated numerous alternatives and concluded that filtration was the best means of protecting drinking water quality.</p>	1.5.

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19.	130, 270, 273, 319, 320, 464, 508	NYCDEP's ability to objectively evaluate alternatives was questioned. There is the perception that NYCDEP is more concerned with forcing the project through as opposed to completing a genuine EIS that adheres to the SEQRA/CEQR process and that seriously studies the impacts of the project on the local environments.	NYCDEP, is acting scientifically, responsibly and in accordance with all laws and regulations as lead agency, and on the basis for its preferred site is made from considerations of the potential environmental, social, and economic impacts at each site alternative.	1.5.
20.	940	The correct County department to approve a curb cut permit is the Department of Public Works	The list of required Permits will be updated with this information	5.20. & 6.20. & 7.20.
21.	974	The FSEIS should specify that at least half of the \$200 million set forth for park mitigations be spent on improvements to Van Cortlandt Park, and that a priority for the remaining funds be set aside for the creation of new public access to and recreation along the Bronx waterfront.	The City intends to spend at least \$75 million on park improvements in Van Cortlandt Park from the \$200 million that the City has committed to expend on Bronx parks as part of the alienation process (as set forth above), and the \$43 million dedicated by the City to certain parks improvements in the Bronx in 1999, pursuant to and as a condition of the ULURP approval of the Mosholu Golf Course site. Additionally, a portion of the remaining funds will be used to create new public access to and recreation along the Bronx waterfront.	
Project Need				
22.	1, 6, , 25, 26, 43, 64, 65, 67, 86, 104, 117, 118, 126, 181, 249, 253, 260, 297, 302, 455, 482, 483, 485, 488, 503, 588, 594, 601, 690, 694, 727	Several comments stated that there is no demonstrated need for the project. They state that there are only minor problems with Croton water which do not justify the major environmental impacts associated with building the filtration plant. Information found on NYCDEP's own publications and websites is referenced that indicates that Croton water fulfills all primary state and federal health standards. The water is as good today as in the past. NYCDEP does not consider that only parts of the watershed may need filtration. The only justification given for the plant is that the EPA and NYSDOH require it. No public-health based reason has been given and NYCDEP refuses to address filtration avoidance. The rationale for the project has shifted from discoloration to disinfection byproducts—it is like a project looking for a need to exist. Other comments state that the City's acquiescence on filtration of the Croton Supply was part of an agreement that helped the City to achieve filtration avoidance for the Catskill Delaware System. Some comments mention that filtration will provide economic benefits to a few and polluted water to the many.	A full discussion that states the NYCDEP's reasons for building the WTP was presented in Section 2 of the Draft SEIS. NYCDEP's objective is to provide equally high quality water to all users. Currently, Croton water is of a lesser quality than water from the Catskill/Delaware system. The Croton water supply meets current primary health-based standards, but it is likely to fail future standards. Also, color and turbidity (secondary standards) are regulated by NYSDOH and the Croton Water Supply would currently fail to meet these standards without seasonal shutdowns of the system.	2.2.

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23.	7	The longest period that Croton was taken off line (in 2001) was for a cleaning fluid leak and not for a color, odor, etc. violation.	The clean-up of a leak takes a long time. There have been numerous times that the Croton was taken off-line due to the potential color/odor violations. During critical operating periods and during certain drought conditions it is imperative to increase the Croton System's reliability.	
24.	21, 32, 46, 184, 295	The filtration plant will not protect against many pollutants that enter the water due to overdevelopment.	Filtration is very effective at removing organic contaminants, metals, and other pollutants arising from both natural and anthropogenic causes, however, as stated in the DSEIS NYCDEP is committed to a multi-barrier approach to water quality, which includes as its cornerstone watershed protection.	2.3.6.
25.	53, 841	The proposed plant size is far too big. There is no justification for a 290 mgd plant.	Average use of the Croton WTP is now and would be in the future 150 mgd, but the project must be sized to maximize the use of Croton water, which is 290 mgd, in the event of droughts or maintenance shutdowns of other components of the City's water supply.	3.2.1.
26.	809	DEP has not described the future condition of Croton water in 2011 (i.e. future baseline has not been established), as required by SEQRA. Improvements and protection programs have been scheduled, but no determination that filtration methodology will still work or even be necessary has been made. This also does not minimize or avoid adverse environmental impacts. This is in violation of SEQRA.	Filtration of water is practiced in almost all municipalities worldwide. It's efficacy in improving water quality is well established. NYCDEP has committed to many protection programs to safeguard the quality of Croton Water and therefore, does not anticipate a degradation of the current quality of the Croton Water Supply System	2.1.
27.	706, 707, 720, 726	An analysis is needed that shows the number of times the Croton Reservoir System has been shut down due to color problems. Chlorine dioxide has not been satisfactorily studied as an alternative to filtration. NYCDEP must provide a record for investigation this alternative. There have been significant advances in production and dosing regimens for ClO ₂ : <ul style="list-style-type: none"> • Chlorites are not a regulated DBP, as stated in the DSEIS • Chlorites can be precipitated out with ferrous chloride • High contact time in NCA would get rid of cold temperature problems 	NYCDEP has reviewed the use of chlorine dioxide and other alternative disinfection methods. An updated description of this work that includes an expanded discussion of the reasons that chlorine dioxide in place of filtration is not a suitable approach for the Croton Water Supply will be presented in Section 2.3.2.1 of the Final SEIS.	2.3.2.1.
28.	723	Filtration is unnecessary as Croton water has not deteriorated in over 10 years. The Consent Decree has a clause that says the city can open negotiations with regulators. NYCDEP failed to open discussion with EPA despite their interest in chlorine dioxide.	As far as NYCDEP and its regulatory oversights are concerned, no compelling new evidence has surfaced that indicates that filtration is avoidable.	2.3.
29.	724	There has never been a public hearing expressly dedicated to the question of the need to filter. Discussion of non-filtration alternatives is useless if the only purpose of the SEIS is to determine how and where the action will be realized.	There were numerous meetings held in 1996-1999 under the auspices of a Citizens Advisory Committee dedicated to discussing the need to filter. In addition Commissioner Ward attended public forums on this topic in the Bronx and Manhattan in 2003.	2.3.6.

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30.	695, 697, 729	The Draft SEIS states that organic carbon naturally produced in the watershed is the primary cause of eutrophication despite NYCDEP, NRDC, and the Draft SEIS itself stating that phosphorous from non-point source pollution is primarily responsible for algal growth, taste and odor problems, increased DBPs, turbidity, and degraded fish habitat. In order to support the need to filter because of the presence of carbon DBP precursors, the SEIS must document the percentage of TOC attributable to decayed organic matter vs. that attributable to runoff from non-point sources. NYCDEP has not provided any authentic, peer-reviewed study indicating that carbon from wetlands is the cause of algal growth, DBPs, and eutrophication.	The organic carbon is a consequence, not a cause of eutrophication. Organic carbon production is increased by phosphorus in the system. The majority of Total Organic Carbon (TOC) in the Croton watershed is from nonpoint sources in the watershed. Only a small fraction of the TOC reacts with chlorine to form Disinfection By-Products (DBPs). Given the higher levels of DBPs in the Croton water supply and the health implications, NYCDEP sponsored in-depth research in the Croton watershed that focused on the sources of the DBP precursors. The results indicate that wetlands, particularly colored-water wetlands, consistently produce the highest levels of both THM and HAA precursors. Concentrations from other land uses varied according to the drainage ability of the basin, but were an order of magnitude or more less than the wetland areas. Since the watershed-specific research indicates the precursors are primarily coming from natural sources (i.e. wetlands), watershed management is not capable of addressing this issue. The Croton Terrestrial Processes Project Final Report that documents this will be released in late 2004. It is under preparation by the SUNY College of Environmental Science and Forestry	2.3.6.
31.	730	The SEIS should include the predictive modeling used to substantiate the need for filtering. The Draft SEIS claims that the presumption of failure to meet water standards is based on existing measured water quality whereas the 1998 Draft SOW says it's from modeled results.	Modeling information was extensively presented in other documents summarized in the 1999 Final EIS. New studies since 1999, and a summary of the earlier work, were provided in the Draft SEIS. However, the "presumptive failure of the Croton water to meet future DBP standards" is based on existing measured water quality, not modeling results. The modeling results were used to support the conclusion that watershed protection on its own was not sufficient to meet water quality standards at a level of reliability sufficient for a public drinking water supply.	2.3.6.
32.	825	What exactly makes up a filter plant? Under the federal rules, treatment criteria includes inactivation of <i>Giardia</i> and <i>Cryptosporidium</i> , as well as using less chlorine in the distribution system in order to lower disinfection by-products (DBPs). Describe the nature of Croton water that would require pre-treatment for turbidity and color. Assess if turbidity pre-treatment and UV meet the federal and state rules for a filter plant.	<i>Controlling Disinfection By-Products and Microbial Contaminants in Drinking Water</i> (USEPA 600-R-01-110, December 2001) defines filtration as: "A process for removing particulate matter, microorganisms, and some chemical contaminants from water by passage through porous media." Turbidity pre-treatment by coagulation and disinfection would not meet the federal and State mandate to filter the water because these processes would not remove small particles from the water. While UV ensures or reduces the threat from <i>Cryptosporidium</i> and <i>Giardia</i> , the processes would not remove small particles from the water.	2.3.2.
33.	703	Midge fly larvae are not from Croton Reservoirs, but rather from sediments in JPR. Sediment should be removed from JPR (especially in summer months) instead of building a treatment plant.	Agreed, but currently water enters the distribution directly from Jerome Park Reservoir. In the future the water would either be filtered after Jerome Park Reservoir or the Reservoir would be taken off line, except for emergencies.	2.1.

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<i>Distribution System</i>				
34.	73, 699, 700, 804	DEP failed to assess infrastructure issues contributing to poor water quality reaching consumers. The DSEIS does not address the aging and failing distribution system within the city and the potential that this may be the cause of the color and taste problems. A WTP system upstream of the distribution system will not provide high quality water at the tap. DSEIS needs to provide information regarding NYCDEP plans to repair distribution system. The Draft SEIS states that “recent research” indicates that iron from sediments is the primary cause of seasonal color in Croton water. No supporting documentation is provided. A recent AWWA article indicates that pipe corrosion can be the primary cause of color, taste, and DBPs.	NYCDEP has other projects, as well as routine maintenance activities, that address problems in the distribution system. These projects will improve water quality the tap for some customers but they are not part of the scope for the Croton WTP project. The Extended Special Studies Program report of 1997 identified the sources of color in the waters of New Croton Reservoir and determined that the oxidation of iron and manganese is a principal cause of the “color spikes” that occur in the Fall. Dissolved Organic Carbon is responsible for baseline color levels. These results have been confirmed and better quantified in Process Studies that are due for release in late 2004. These studies refer only to sources of color in the raw water as it enters the distribution system. NYCDEP agrees that the condition of pipes in the distribution system and local piping in individual buildings can be responsible for even higher color levels.	2.1.
35.	702, 913	The NRDC identified aging distribution system to be main cause of many problems in drinking water in 19 cities nationwide. MWRA won the right to rehabilitate their delivery system prior to building a filtration plant. NYCDEP presents no timetable for delivery system upgrade. Risks from distribution system may be more important that those from inadequately treated water.	As discussed above, water at the entry to the distribution system fails to meet standards. MWRA was not facing color and turbidity problems from their raw water supply.	2.1.
36.	719	A study is needed to determine the cause of the discoloration and odor and how repairing the distribution system would correct the problem.	NYCDEP does not believe that this is the root of the Croton Water Supply issue, as stated above; a study such as this is beyond the scope of this SEIS.	
<i>Watershed Protection/Filtration Avoidance</i>				
37.	316	The mandate has not stated the water must be filtered; rather it says the problem must be dealt with.	The 1989 Surface Water Treatment Rule (SWTR) mandates filtration of all surface drinking water supplies unless stringent criteria for watershed protection required for filtration avoidance could be met. NYCDEP (with the concurrence of NYSDOH) determined at that time that the Croton would not meet those requirements and therefore did not apply for a filtration waiver. NYC is bound by a Consent Decree with the federal government mandating filtration.	2.3.1.

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38.	12, 489, 496, 739, 813, 814	<p>Given that the WTP would not be built until at least 2011, watershed protection is important. NYCDEP cannot implement a program without the help of the EPA, State, and local citizenry. Because of NYCDEP's own documented inaction and indifference to the Croton system, an effective watershed protection program must contain the following:</p> <ul style="list-style-type: none"> • Action now, seeing as the WTP will not be on line for another decade at best. Croton must be considered an unfiltered system starting now. • NYCDEP doesn't have the desire or resources to do it alone. They must engage local municipalities and citizens. • Collaborative effort to identify problems and solve/fund them, acquire land, and WPCP upgrades. • Involve EPA and state (DEC) in protecting Croton watershed. Use expertise, proven protection programs, training, management expertise, and legal muscle of these agencies. • A binding MOA reflecting an effective Watershed Protection Program for Croton must be executed. <p>NYCDEP's commitment to watershed protection is inadequate:</p> <ul style="list-style-type: none"> • NYCDEP does not involve all governmental agencies/private parties necessary to identify problems in watershed. • No overall objective or plan for watershed protection. • NYCDEP is simply carrying out programs it's obligated to do under MOAs. • NYCDEP has not demonstrated commitment, resources, or funding to implement effective Croton program. • Land acquisition far behind that of Catskill/Delaware. • NYCDEP is far behind schedule with promised WPCP upgrades. • The Final Generic EIS (1993) for the Watershed hints that NYCDEP believes that pathogens and contaminants can be effectively neutralized by WTP alone. • NYCDEP has not implemented Non-point source program. • NYCDEP is under enormous pressure from developers. NYCDEP should also work to get streams reclassified. 	<p>NYCDEP is committed to watershed protection as an essential element in providing high quality water to users in addition to filtering the water. Some of the watershed work that is ongoing and planned is described in Section 2.3.7 of the Draft SEIS. The scope of this SEIS is to inform a decision regarding the siting of the Croton Water Treatment Plant. Croton Watershed Protection and Planning, while ongoing, is outside the scope of this SEIS.</p> <p>There is a binding watershed protection program as part of the Watershed MOU.</p> <p>NYCDEP cooperates with NCSDEC to review and comment n stream classifications but the authority for these actions resides with NYSDEC.</p> <p>The Management Plans that are under development and implementation by Westchester and Putnam Counties are not part of this proposed action but are part of NYCDEP's commitment to watershed protection. These and other planned actions are summarized in Section 2.3 of the Draft SEIS.</p>	2.3.

Item #	Comment Number	Comment	Response	Section Reference
39.	812	Contrary to what NYCDEP says, its actions are not strictly bound by Consent Decree; it has the discretion to implement a watershed protection program. NYCDEP has acknowledged the critical role of watershed protection, both in DSEIS and other publications, in conjunction with filtration as part of a multi-barrier approach. Filtration alone cannot succeed (as evidenced by Milwaukee).	Watershed protection is not part of the Consent Decree that requires filtration of the Croton Supply, but NYCDEP believes it is an important element of water quality protection. Watershed protection alone would not have prevented the presence of parasites that resulted in the illness in Milwaukee, as the source of those parasites was the raw water supply.	2.3.6.
40.	5, 8, 9, 10, 23, 29, 41, 42, 312, 458, 560, 561, 779, 969	The NYCDEP should: <ul style="list-style-type: none"> • Repair the NCA to prevent pollution infiltration and leaks • Repair the distribution system/infrastructure in NYC, which would improve the color of the water. • Enhance the Croton Water protection program, which is currently at \$25 million compared to the \$250 mil allocated to the Catskill/Delaware watershed • Work with NYSDEC to create a fund designed to carry out Phase 2 storm water program • Consider new technologies developed in the last decade other than filtration (UV ozonation, chlorine dioxide. These technologies do not produce byproducts of chlorine disinfection that are concerns of the NYCDEP • Upgrade WPCP in the Croton watershed. 	The NCA shall be rehabilitated regardless of where the WTP is placed. In addition, NYCDEP is committed to land acquisition and WPCP upgrades in the Croton watershed. The status of these initiatives is presented in Section 2.3.4 of the Draft SEIS. Filtration avoidance has been reviewed and determined not to be a viable alternative.	2.3.4.
41.	11, 505, 506, 543, 708	Data from NYC Water Supply System indicate that the Croton system has consistently lower levels of <i>Cryptosporidium</i> , water pathogens, and <i>Giardia</i> cysts than the Catskill/Delaware supply. UV, ozonation and chlorination are being implemented for the Catskill/Delaware. This technology is safer and less costly and would protect against these pathogens. The Croton system should do the same.	UV has been incorporated into the design of the WTP. This technology used in conjunction with chlorination, however, is not considered an acceptable alternative to filtration.	3.3.2.
42.	19, 22, 66, 71, 103, 123, 124, 128, 247, 452, 499, 717, 952, 967	Filtration will lead to law changes allowing urban sprawl and overdevelopment. This will result in degradation of the water supply and additional pollution that the plant is not designed to handle. NYCDEP must be better stewards of the watershed. A protection plan like that for Catskill/Delaware must be instituted. Filtration should not be considered a panacea for all pollutants and contaminants entering the system.	As part of the multi-barrier approach to watershed management, filtration shall be performed in conjunction with effective management of the watershed. It should be noted though that the local governments have primary control of growth management and development.	2.3.4.2.

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43.	20, 78, 84, 87, 98, 242, 296, 300, 301, 311, 334, 409, 453, 544, 677, 688, 704, 705, 734, 738, 744, 746	Watershed protection is a superior and less costly alternative to filtration. New technologies are available that can clean the water without filtration. The impact of alternative technologies should be compared to the on-site and off-site impacts (e.g. sludge removal) of the WTP. The WTP should not be built anywhere. Those who use the water for industry, development, and profit must be made accountable for their use. Money allocated for the construction should be used to restore the environment and protect the watershed. More stakeholder outreach should occur. This would still employ the same number of people as construction.	Watershed protection is an essential element to management of the drinking water supply. However, protection is not viewed as an alternative to filtration but rather an essential complement to it. There are no known feasible actions in the watershed that can produce the same consistent level of water quality as filtration. Additional measures to protect the watershed, even if they were feasible, would still not protect the water supply from natural sources of contamination as well as accidental contamination from the numerous roadways and the 190,000 people who reside in the watershed.	2.3.4.2.
44.	62, 89, 109, 110, 119, 500, 711, 713, 728	The decisions in the 1997 Watershed MOA regarding non-point source pollution and upgrading sewer plants have not been implemented. In the 1997 MOA, NYCDEP agreed to upgrade all WPCPs. The majority of plants at this point have not been done. NYCDEP must provide the status of these upgrades and how far behind schedule these upgrades are. WPCPs would lower phosphorus loads which lead to eutrophication. The cost of upgrades is small compared to the WTP.	Information on the progress of wastewater treatment plant upgrades in the Croton watershed was summarized in the Draft SEIS Section 2.3.7. NYCDEP has undertaken an upgrade of WPCPs in the Croton watershed by committing to fund the upgrades of all City-owned and non-City-owned wastewater treatment plants (WPCPs) to state-of-the-art tertiary treatment facilities. In the Croton Watershed, a total of eight facilities (22 percent of the total flow) have their upgrade plans on hold until final decisions are made regarding diversion off the watershed. One City-owned facility is upgraded (Mahopac WPCP) and the other will be rebuilt and turned over to the village to operate (Brewster WPCP). Several private and/or municipal facilities have completed their upgrades and the majority is currently in the process of upgrading.	2.3.7.
45.	30, 294, 712, 736	The consultant F.X. Brown stated that more studies on alternatives to filtration should be performed. He pointed out flaws in the ESSP including the conclusion that considered land acquisition ineffective, insufficient evaluation of watershed management practices already established, using alum, and constructing wetlands instead of preserving those already there. If these studies were done the Consent Decree states that NYCDEP may look at filtration alternatives if new information indicates that alternatives are viable. SEIS should include list of peers that reviewed the ESSP and a copy of their comments.	The F.X. Browne report recommended additional studies, and these studies have been conducted. The final report on the process studies is due for release in 2004. The highlights of the projects are reviewed in Section 2 of the Draft SEIS. The deficiencies referred to in the Browne report relate to the information that was available to support the modeling, most notably an incomplete carbon budget for the system. The F.X. Browne report supported the general conclusion that filtration would provide more consistent and reliable treatment of the water than the proposed in-reservoir and watershed-based treatments. NYCDEP has not developed a scenario that has convinced the Department that a viable alternative to filtration exists. This is a prerequisite to any attempt to open negotiations with the regulatory agencies on filtration avoidance. The list of external peer reviewers that supported the general conclusions and a summary of their comments are in Section 2.3.6 of the Draft SEIS.	2.3.6.
46.	44	NJ has set up a task force to find ways to save the watersheds and highlands. NYCDEP should do the same.	NYCDEP conducts numerous studies that assess how best to manage watersheds and highlands that relate to NYC water supply.	2.3.

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47.	68, 88, 94, 99, 108, 115, 127, 182, 183, 496, 684, 685, 691, 715, 731, 733	DEP is not committed to protecting the Croton Watershed. It must become more involved with planning meetings for upstate developments in order to better protect the watershed. Previous NYCDEP head said he didn't care about the watershed. At least one memo stated that protecting the waters would be a back burner issue if and when the filter is built. There is no demonstrated commitment to acquire property in or defend either the Kensico or Croton watersheds. The Kensico is more vulnerable than the Croton. Failure to protect the watershed would result in the requirement for a larger WTP. NYCDEP projects were listed that were delayed or of an inadequate scale to do much good. NYCDEP should disclose its watershed efforts, enforcement actions, and filtration efforts completed to date. There needs to be a comprehensive, regional approach to stormwater, sewage, and watershed protection with the responsibility for this planning resting on NYCDEP, NYSDEC, and Westchester and Putnam counties.	Through its watershed land acquisition efforts, NYCDEP has secured several key parcels in the New Croton Reservoir basin. NYCDEP initially committed \$10 million for land acquisition in the Croton system under the MOA, later increased to \$13.5 million. To date, \$7,400,000 has been spent and 526 acres have been acquired by the City through outright purchase or conservation easements. An additional \$25 million has recently been allocated by the City for additional purchases in the New Croton and Cross River watersheds. The City has also worked with the State to direct State acquisition dollars; to date, NYSDEC has acquired 693 acres at a cost of \$7.5 million. These properties will be conveyed to the City under MOA guidelines. The City and State are also continuing to advance important regulatory programs to protect water quality in the Croton against specific, future activities. The 'Rules and Regulations for the Protection From Contamination, Degradation and Pollution of the New York City Water Supply and Its Sources', effective May 1, 1997, require most projects that disturb more than two acres of land to prepare and implement a stormwater pollution prevention plan (SPPP) that at a minimum, meets the requirements of 'Part III of the New York State Department of Environmental Conservation General Permit No. GP-93-06.' Over 350 SPPPs have been reviewed by NYCDEP staff in the Croton watershed since the regulations were implemented in 1997. In addition, NYCDEP expanded its MOA with NYSDEC for the implementation of an inspection and enforcement program of SPPPs during construction; this program, which has been in place in the Croton watershed since 2000, has resulted in a significant reduction of water quality violations due to construction related activities. NYCDEP has made a commitment to acquiring land and encouraging conservation, and shall continue to do so. The NYCDEP has a series of studies and programs as part of an ongoing effort to protect the watershed. Some of these programs are short-term but others are expected to extend for years into the future. Together they comprise a planned and organized program of watershed protection that utilizes NYCDEP's resources and regulatory authority to the maximum. A complete history of comments and enforcement actions would run to several thousand pages. However, as discussed above, the watershed protection efforts, past and planned, are summarized in Section 2.3 of the Draft SEIS.	2.3.
48.	101	Rate payers' money needs to go to wetland protection and infrastructure husbandry.	Wetland protection and infrastructure work alone would not eliminate the need to filter the Croton supply.	2.3.6.

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49.	106, 696, 758	NYCDEP and NYSDEC are doing nothing to protect the watershed. A study was performed (Trout Unlimited) that mapped out every single entry point of non-point source pollution into the Croton watershed (200 identified runoff points). This was delivered to agencies. The only agency that acted upon this was the DOT.	This report was given to NYCDEP and reviewed. This study provides valuable recommendations on the control of non-point sources. However, as stated above, the regulatory agencies, scientific peer review panels, and NYCDEP concur that watershed protection alone would not provide reliable water supply without filtration.	2.3.6.
50.	107	The DEC, not the NYCDEP, has the real power to protect the watershed. However, NYSDEC has only one person responsible water quality in seven counties.	Comment noted.	
51.	114	The NYCDEP should not have allowed the planned development on the Muscoot Reservoir to proceed.	NYCDEP has limited authority over development that is approved by the local Towns.	
52.	497	Education is required to better protect waters east of Hudson.	Noted	
53.	498	DEP has been successful in obtaining filtration avoidance for Catskill/Delaware. The \$1.5 billion must be spent on doing the same for Croton.	The decision to apply for filtration avoidance in the Catskill/Delaware was made on the basis of compelling evidence that it would indeed pass the strict standards needed to avoid filtration. The conditions in the Catskill/Delaware system are different than those that exist in the Croton. Filtration avoidance is not viewed as a viable option for the Croton system.	2.3.6.
54.	502	Variances for developers are constantly granted in Croton. NYCDEP must use its influence to end this practice.	NYCDEP encourages the responsible use and maintenance of the watershed and participates in the locals SEQRA process when applicable.	2.3.4.2.
55.	500, 678, 679, 680	Non-point source pollution (especially phosphorus) results from suburban sprawl and leads to algal blooms. Non-point sources account for 85% of phosphorous in the Croton Reservoir. WPCP upgrades are important, but only account for 15%. Environmental activists have provided NYCDEP with locations of non-point entries. NYCDEP must use this data.	Non-point runoff is an important contributor to eutrophication in the Croton system. NYCDEP is committed to reducing non-point runoff and runoff from the existing 63 wastewater facilities in the watershed. However, eutrophication is a natural process that would occur in the absence of any development. NYCDEP's modeling and monitoring indicate that the Croton system, because of its large watershed area and thick soils, would develop color from eutrophication despite all attempts at watershed management. NYCDEP has developed phosphorus budgets for the Croton watershed. Non-point sources do represent a significant portion of the phosphorus inputs. These inputs are regulated as part of the Total Maximum Daily Load program and the designation of certain Phosphorus-Restricted Basins that give regulators more authority in regulating activities and development in the watersheds.	2.3.6.
56.	698	It has been unofficially estimated that it would cost \$10 million to clean up current storm water runoff entering the watershed.	NYCDEP is not aware of any specific program that has been designed or developed that could be conducted for that price.	
57.	732	SEIS must include list of all permanent permitted structures in Croton watershed as this will influence directly the ability of the WTP to filter and need for the project.	There are approximately 190,000 people living in the Croton watershed. Their homes, businesses, and community facilities are all part of the watershed. It is not practical or necessary to list all the permanent structures in the watershed.	2.3.4.2.

Item #	Comment Number	Comment	Response	Section Reference
58.	734, 735, 737, 909	SEIS should include record of NYCDEP’s response to EPA’s offer to consult with NYCDEP on filtration avoidance. Consent Decree has clause that allows NYCDEP to re-open discussion if new information is available that provides new alternatives to filtration. EPA has the authority to approve alternative treatment technologies. The information upon which the decision was made not to seek filtration avoidance was not included for public review. The Consent Decree demands compliance with the Safe Water Drinking Act, not necessarily filtration.	NYCDEP does not believe that a viable alternative to filtration exists. This is a prerequisite to any attempt to open negotiations with the regulatory agencies on filtration avoidance. As discussed above, watershed protection is not considered to be a viable alternative to filtration. NYCDEP’s commitment to watershed protection is not to be traded for a filter plant; both efforts are expected to proceed simultaneously.	2.3.6.
59.	796, 815	<p>Parties to consent decree must continue to consider alternatives to filtration.</p> <ul style="list-style-type: none"> • Water currently fulfills all standards-HAA5 was isolated case, larvae and turbidity not a chronic problem, turbidity an aesthetic issue. • Despite NYCDEP claims, algae growth (and therefore DBPs) will not increase due to WPCP upgrades, phosphorous loading decreases, nonpoint source reduction. • ClO2 has been effective in tests as an interim measure study of James W. Roberts, P.E., PhD and two reviewers included presenting efficacy of ClO2). • Consent Decree allows parties to renegotiate type and extent of filtration based on new scientific information, of which there has been a large amount. NYCDEP/JV has not seriously studied alternatives. • EPA, DOH, and NYCDEP have obligation to consider modifications/alternatives. <p>Based on the above, filtration is not necessary, and NYCDEP is required to seek alternatives that have the least impact on the environment.</p>	The need for filtration is based on consensus of scientific opinions, NYCDEP experience with managing the system, and a court order to filter the water. Alternative disinfection means, such as chlorine dioxide, do not address all the needs (see Section 2.3.2.1. of the Draft SEIS ad the expanded section on this topic that will be in the Final SIS). It is not acceptable to say that violations of drinking water standards are “isolated” cases when technology exists to prevent them. These violations would be much more frequent if the Croton system were operated twelve months per year. Routine shutdowns in the Fall prevent violations. In the next two decades, the Croton System will be relied upon more to provide water while other components of the City’s supply undergo repairs and upgrades. NYCDEP does not believe that new evidence has emerged that obviates the need to filter the Croton supply.	2.3.5. & 2.3.2.1.

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Land Acquisition				
60.	13, 14, 18, 22, 111, 112, 113, 121,122, 212, 214, 215, 451, 501, 709, 710, 778, 914	The NYCDEP must buy sensitive lands. \$240 million was promised to the Bronx, but only \$25 million was spent on buying land in Croton watershed. More money should be spent on buying land in the watershed. The money should be used to buy lands instead. Filtration siphons limited resources from watershed protection. Westchester County has ~\$56 million allocated but has spent none of it on land acquisition. NYCDEP and NYSDEC should expand the program for land acquisition in the watershed and preserving the land surrounding the reservoirs.	Through its watershed land acquisition efforts, NYCDEP has secured several key parcels in the New Croton Reservoir basin. NYCDEP initially committed \$10 million for land acquisition in the Croton system under the MOA, later increased to \$13.5 million. To date, \$7,400,000 has been spent and 526 acres have been acquired by the City through outright purchase or conservation easements. An additional \$25 million has recently been allocated by the City for additional purchases in the Croton and Cross River watersheds. The City has also worked with the State to direct State acquisition dollars; to date, NYSDEC has acquired 693 acres at a cost of \$7.5 million. These properties will be conveyed to the City under MOA guidelines. The City and State are also continuing to advance important regulatory programs to protect water quality in the Croton against specific, future activities.	2.3.7.
61.	213, 817	Acquiring land instead of building plants will diminish the environmental impacts associated with construction. The money should be spent on land acquisition and not the WTP.	As noted above, NYCDEP does not view land acquisition as an alternative to water filtration.	2.3.6.
62.	714	City has acquired only 500 acres of land in watershed since 1997. NYCDEP's assertion that it can't acquire the land is not true. EPA estimates that 25% of watershed land is required to protect water (=25K acres in Putnam). This much land is available in Westchester and Putnam. NYCDEP should allocate funds to purchase land.	When the USEPA mandated the filtration of large public water supplies, EPA set 25% control of the watershed as one of several criteria to meet minimum standards to demonstrate filtration avoidance. Applicants had to demonstrate this minimal level of watershed control as part of a filtration avoidance action. The deadline for this action was 1991. The control of 25% of the land was not the only criterion that justified filtration avoidance. NYCDEP concurred with NYSDOH and USEPA that the high population density (254 per square mile versus 19 per square mile for the Catskill / Delaware systems), large watershed area, nutrient rich soils, and existing developments failed to meet the other filtration avoidance criteria.	2.3.4.
63.	716, 757	The Draft SEIS states that NYCDEP gave Westchester and Putnam Counties \$68 million through the MOA to buy land. Putnam has spent most of theirs, Westchester has spent none, and NYCDEP is not actively acquiring land. How is watershed being protected? NYCDEP has ultimate responsibility but is not working with towns and counties to solve problems.	The MOA pertaining to who has control of these funds has not been completed but this will be a topic that the parties will consider. NYCDEP is working with the counties to expedite the land acquisitions.	2.3.7.
64.	740, 741, 742	The SEIS should include maps showing all land acquired in the Croton watershed by NYCDEP, Westchester and Putnam counties, and all land available for purchase. Should include estimate of cost of acquisition (from certified assessor) and water quality benefits (from independent watershed management expert).	Figure 2-6 shows land acquisitions that have been completed. Costs of all the programs are shown in Section 2. No one is able to quantify the water quality benefits of specific land acquisitions	2.3.7.

Item #	Comment Number	Comment	Response	Section Reference
65.	745	<p>The SEIS should explain why NYCDEP doesn't acquire more land if it feels land acquisition is essential component to watershed protection. This contradicts the "multi-barrier" approach. NYCDEP contends it may be cheaper to filter, despite paying \$1.5 billion for the plant and another \$243 mil in reparations. This suggests the following:</p> <ul style="list-style-type: none"> • there is competition for funds between filtration and land acquisition • filtration is preferred option at expense of protection • DEP is willing to spend unconscionable amount of rate payers' money, despite financial strain in NYC and despite it being cheaper to buy the available land. 	<p>DEP does not view watershed protection and land acquisition as alternatives to filtration. They are an important component of the multi-barrier approach to water quality, but not an alternative to filtration. The commitment to filter the water is required by federal law, court order, and an interagency agreement. Funding for watershed protection is part of an MOU with upstate communities.</p>	2.3.7.
<i>Park Alienation</i>				
66.	55, 226, 849, 850	<p>As discussed in the Final Scope of Work, no description was provided of action to take prior to alienation. Temporary versus permanent alienation was not defined.</p>	<p>Section 6.3.2.1.2 addresses the Alienation from a Land Use perspective and describes the MOU that must be completed before the Alienation would become effective. Section 6.5.3.1 discusses the impact of the Alienation on Open Space. This section is expanded in the Final SEIS</p>	6.2.3.1.2. & 6.5.3.1.
67.	956	<p>All of the terms of the State Legislation passed in 2003 providing conditional approval of alienation of parkland must be met before the Mosholu Site could be selected as the preferred site.</p>	<p>NYCDEP will adhere to all of the provisions in the 2003 State Legislation that was passed approving alienation of parts of Van Cortlandt Park.</p>	6.5.3.1.
<i>Environmental Justice</i>				
68.	906	<p>All three sites are in or close to environmental justice communities. Enhanced public outreach will be necessary. The City may wish to consider local community enhancements or environmental benefit projects if the WTP is sited in the Bronx.</p>	<p>NYCDEP intends to fully comply with the NYSDEC Policy CP-29 "Environmental Justice and Permitting" issued on March 19, 2003 as part of the application for permits on the preferred site selected by NYCDEP for the Croton Water Treatment Plant. Until such time, NYCDEP has included in the FSEIS an environmental justice analysis and a summary of our extensive public participation plan to date. See EJ discussion in the FEIS and the Executive Summary sections.</p>	6.5.3.1.
69.	244, 265, 266, 308, 349, 350, 356, 426, 510, 511, 535, 592, 627, 652	<p>Siting the plant in the Bronx raises serious issues of quality of life and environmental racism. There is a high immigrant and minority population. The Draft SEIS disregards the disproportionate impacts of this construction on ethnic minority groups. Mosholu is lower income than Eastview, has higher number of racial/ethnic minorities. This NYCDEP would never consider building in Central Park.</p>	<p>The potential impacts to the various neighborhoods affected by the proposed construction at all three sites were equally considered in the Draft SEIS. In response to public comments on the DSEIS, an environmental justice section was added and appears in this FSEIS. The section considers the ethnic and economic composition of each study area and discusses the implications of the potential significant adverse environmental consequences upon low income and minority populations. This section also reviews the extensive public participation process that has occurred.</p>	5.7.3.1. & 6.7.3.1. & 7.7.3.1.

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<i>Conflict of Interest</i>				
70.	45	DEP does not have an interest in preserving the environment as that approach does not provide jobs for consultants and engineers.	NYCDEP has a strong and committed interest in preserving the environment that is evidenced by its programs and activities.	9.1. & 9.2. & 9.3.
71.	74, 75, 105, 129, 136, 219, 310, 617	DEP's objectivity is compromised by being both the applicant and the environmental reviewer for this project. There is no objectivity. Discrepancies and issues would only be noticed by independent reviewers or other agencies. Political and special interest motives control the process.	NYCDEP has submitted its conclusions to numerous independent reviewers, all of whom have concluded that filtration is not avoidable. The environmental assessment is under review by numerous public groups and agencies. The definition of a "Lead agency" is an involved agency principally responsible for undertaking, funding or approving an action, and therefore responsible for determining whether an environmental impact statement is required in connection with the action and for the preparation and filing of the statement if one is required. A majority of the time, the agency proposing a project is the Lead Agency for that project since it is the agency principally responsible for undertaking, funding, and approving an action. Therefore, NYCDEP being the lead agency for the proposed project is in compliance with all applicable environmental review regulations in accordance with SEQRA.	2.3.4.
72.	747	The Joint Venture (Metcalf & Eddy and Hazen and Sawyer) has a conflict of interest in that they are responsible for both construction and for preparing the study that could result in avoidance of the need for the plant. NYCDEP has been intent on building the plant no matter what and is not objective in its assessment of the JV.	Consulting engineers, like other professionals, are hired to provide professional opinions. Sometimes these opinions lead to additional work, and sometimes they do not. NYCDEP had the conclusions made by the consultants reviewed by its internal professional staff and three different peer review groups, one of which was selected by the Citizens Advisory Group. None of these reviews came to the conclusion that filtration could be avoided.	2.3.4.
<i>Security</i>				
73.	571, 970	The effects of a terrorist attack on the WTP would be more acute in an area such as Mosholu versus Eastview. There is a high risk in creating a massive choke point at the WTP versus the low risk of thousands of miles of watershed.	NYCDEP is taking security issues for each of the sites under advisement. Whereas details, for obvious reasons, will not be disclosed, a general discussion will be included in the Final SEIS.	
74.	626	In the post 9-11 world, it is likely that the NYCDEP will cite security as a reason not to return to the public the park land that was taken during construction.	The land scheduled for temporary alienation shall be returned to the public upon completion of the construction phase of the project. Two acres would be permanently taken for the aboveground structures (chemical fill station, etc.).	6.5.3.1.

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75.	754	For Mosholu, how many intake vents will be required, how large, and what security measures will be taken. It is not acceptable to answer this comment by saying that it can't be answered for the sake of security as they will be venting contaminated air (from the 1999 final plan) and will profoundly affect the local community.	The vents would be buried in stone structures on either side of the building that would be incorporated into the fences for the driving range along the north and south sides of the driving range. The stone structures would be about 400 feet long and 13 feet high The operating WTP does not emit smoke or airborne pollutants. The only emissions would be from the boilers for space heating, and these emissions are similar to those from a school or hospital. Much of the below-grade process area would not be heated, so these boiler emissions are not considered a major source. There is no need for special treatment of the exhaust air from the ventilation fans, as they are just ventilating the workspace.	6.19.2.4.2.
<i>Socioeconomic Considerations</i>				
76.	52, 481, 490, 524	Funding is a one page document. No explanation of figures is provided. NYCDEP includes mitigation as part of cost. The manner in which costs were calculated was not adequately presented.	One page of costs is presented as a summary in Section 1.5. Much more detail is presented in the Socioeconomic sections for each of the three site alternatives and in the Socioeconomic Appendix. Cost estimates were done by engineering professionals, reviewed by an independent cost estimator, and then reviewed by NYCDEP. This is standard practice. The mitigation and amenities costs will be pulled out of the Final SEIS cost table to more easily compare actual construction costs between sites	1.5 & 5.7. & 6.7. & 7.7.
77.	131	It is more expensive to build this plant in the Bronx.	Comment noted.	5.7.3.1.1. & 6.7.3.1.1. & 7.3.1.1.
78.	137, 254, 173	Van Cortlandt is the least expensive site.	The construction costs may be slightly higher in the Bronx, but construction costs alone do not reflect the price of the project. The total costs of siting the facility at Eastview in Westchester are greater.	5.7.3.1.1. & 6.7.3.1.1. & 7.3.1.1.
79.	211, 915	Building in Westchester means that NYC will have to pay real estate taxes and people in Westchester will reap the benefits while NYC residents are left with nothing.	While it is true that siting the facility in Westchester results in the highest O & M costs, partly due to taxes; if the WTP is built at any of the proposed sites all City resident will receive the benefit of a more reliable water supply system.	1.5.
80.	255	Using City Tunnel 3 to get filtered water to the city is cheaper than building at the Harlem River Site.	City Water Tunnel 3 currently does not extend outside the City. One of the alternatives for conveying water from the Eastview Site is the extension of this tunnel to Kensico Reservoir. This potential new tunnel, the Kensico-City Tunnel, is expensive (\$2.4 billion), most of which can be attributed to the Catskill and Delaware systems. The project costs attributable to the Croton WTP were described and compared in Section 1.5 of the Draft SEIS. Furthermore, the potential Kensico-City Tunnel bears the risk of budgetary deferrals and other delays.	1.5.

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81.	275, 286, 287, 359, 383, 476, 481, 523, 799, 819, 928	<p>Operating costs are higher at Eastview (due to 30 years of Westchester taxes). However, upstate water users would contribute 9% of total cost of construction/operation. This makes the plant cheaper for NYC users. For NYC users, the increase in water rates is 3.1% for Eastview and 3.8% for the Bronx. Eastview will ultimately be cheaper. The cost savings can be used to fund NYCDEP watershed protection programs in the Croton.</p>	<p>Upstate users would partially defray costs of the WTP if the WTP were built in Eastview, but the differences cited between upstate and in-city water rates lie within the uncertainty of predictions of future rates. Analyzing and illustrating the potential impact of the Croton Treatment Plant site selection alternatives on water and sewer rates necessarily involves making a series of assumptions relative to a diverse set of key variables. Because the project will be built in the future, and future conditions are always uncertain, the analysis is based on estimated values for key variables. Since it is certain that the future conditions with respect to at least some variables will be different than what is assumed for analytical purposes, the rate impact must be considered illustrative, rather than precise, and small rate differences among alternatives should be considered to render those alternatives as roughly equivalent in terms of rate impacts.</p> <p>The following are among the variables for which assumptions have to be made and for which alternative assumptions are possible that affect the rate analysis: each project's construction schedule and its estimated costs, the inflation rate on construction costs, the financing rate realized at the time bonds are issued to finance each projects expenditures, the anticipated completion date of each alternative, contingencies for each alternative, the estimated annual operations and maintenance expenses for each alternative, the inflation rates on operations and maintenance expenses including personnel costs and materials and equipment costs, and the rate of increase on upstate real estate taxes.</p> <p>The impact of the Croton WTP Project on in-City water rates is small and relatively insignificant as between the three alternative sites. Since each site alternative has a different construction schedule and cash flow pattern, it is not useful to compare year-by-year changes among the alternatives or to focus on a single year that is within the construction period of all three sites. Rather, comparable impacts can only be measured by looking at the end year of the analysis when construction and cash flows are complete for each alternative and each alternative's costs are fully embedded in the rate impacts.</p> <p>Since the Draft SEIS, new information on future tax rates in Westchester County was released by the County, and other variables have been adjusted. The rates were carried out to 2016, the final year of construction for one of the Eastview alternatives.</p> <p>While there is a small difference in the Final SEIS presentation of \$1 between Eastview (KCT) and Mosholu, and \$2 between Mosholu and Harlem River, these differences are more apparent than real and are not decisive in an analytical sense. Consider that the difference between Eastview (KCT) and Mosholu in terms of the metered water rate is one cent per hundred cubic feet (\$3.20/CCF as compared to \$3.21/CCF at Mosholu). This small differential could easily be negated yielding equivalent values for the two alternatives, or even be overcome making Eastview more expensive as compared with Mosholu, if only a small variance obtains between the actual future conditions and the assumptions made for projection purposes.</p>	5.7.3.1.1. & 6.7.3.1.1. & 7.3.1.1.

Item #	Comment Number	Comment	Response	Section Reference
			<p>The impact of the Croton WTP Project on in-City water rates is small and relatively insignificant as between the three alternative sites. Since each site alternative has a different construction schedule and cash flow pattern, it is not useful to compare year-by-year changes among the alternatives or to focus on a single year that is within the construction period of all three sites. Rather, comparable impacts can only be measured by looking at the end year of the analysis when construction and cash flows are complete for each alternative and each alternative's costs are fully embedded in the rate impacts.</p> <p>Since the Draft SEIS, new information on future tax rates in Westchester County was released by the County, and other variables have been adjusted. The rates were carried out to 2016, the final year of construction for one of the Eastview alternatives.</p> <p>While there is a small difference in the Final SEIS presentation of \$1 between Eastview (KCT) and Mosholu, and \$2 between Mosholu and Harlem River, these differences are more apparent than real and are not decisive in an analytical sense. Consider that the difference between Eastview (KCT) and Mosholu in terms of the metered water rate is one cent per hundred cubic feet (\$3.20/CCF as compared to \$3.21/CCF at Mosholu). This small differential could easily be negated yielding equivalent values for the two alternatives, or even be overcome making Eastview more expensive as compared with Mosholu, if only a small variance obtains between the actual future conditions and the assumptions made for projection purposes.</p>	
82.	276	12% of the KCT costs were put towards the Croton WTP. 88% of KCT therefore had better be put towards the UV filtration plant.	The analysis of the UV project is beyond the Scope of this SEIS. However, to answer the comment, the UV project can use existing conduits that pass through the Eastview Site. The Kensico-City Tunnel (KCT) would increase system reliability with redundancy for the Catskill and Delaware Systems between Kensico Reservoir and the distribution system. The Croton WTP project would rely on the KCT as its sole treated water conveyance, if that conduit is chosen; therefore applying a portion of the KCT cost to the Croton WTP project is justified.	8.3.1.
83.	281, 283, 284	\$290 million of the cost of Eastview is for the KCT. Eastview is actually \$69 million cheaper than Mosholu. The Draft SEIS suggests that Eastview is the cheaper site.	The cost of a treated water conveyance, whether it is part of the KCT costs or the full rehabilitation of the NCA, is a real cost that must be attributed to the Croton project.	5.7.3.1.
84.	332	The price that future generations will have to pay for the plant has not been considered.	The costs of bonding, interest, and operating costs are all included in the costs.	5.7.3.1.

Item #	Comment Number	Comment	Response	Section Reference
85.	358, 369, 382, 391, 593, 608, 616	The Cost of construction at Eastview is \$20 million cheaper than Mosholu and would be less disruptive. It should be built there.	Construction costs of the WTP are only part of the project costs. Operating costs and the costs of the conveyances also must be considered. Construction costs combined with Operating costs form the Life Cycle costs of the project, which is the best way to compare total project costs.	5.7.3.1.
86.	361	If built at Eastview versus Mosholu, NYCDEP would spend \$290 million on the KCT instead of \$250 million on Bronx parks. NYCDEP shouldn't be spending on city parks, anyway.	Noted.	
87.	364, 460, 531, 533, 878	Westchester would pay a significant percentage of the cost of the WTP because of it's vulnerability to Catskill/Delaware disruption. The money saved by building in Eastview could be used on infrastructure and park improvements. Water and sewer rates for New York City residents would be lower if built in Eastview because Westchester would have to pay rates for their filtered water. NYC rates will go up more if built in the Bronx.	The differences in future rates between the project alternatives for in-City users are on the order of \$10 per year per household, or about 1% of total annual water and sewer rates. Please review the response to item number 81. These differences will probably not be a determining factor in the site selection.	5.7.3.1.
88.	365, 818	NYC should not burden its residents and taxpayers when Westchester is willing to take the plant. Most of the residents of Kingsbridge and Riverdale do not want the filtration plant built at Mosholu.	There is local opposition at all the proposed site alternatives.	
89.	461	Future construction for a Catskill/Delaware filtration plant at Eastview would be cheaper if it was an add-on to an already built Croton facility.	The future construction of the Catskill and Delaware filtration plant at Eastview would not be cheaper if it was built as an "add on" to the Croton WTP. The capacity of the Catskill and Delaware filtration plant has already taken into account a Croton WTP being able to supply 290-mgd to meet the City's and Westchester County's water demands. For this reason building the Croton WTP does not reduce the capacity of the Catskill and Delaware filtration plant. In addition, the Croton and Catskill/Delaware plants utilize different water treatment processes, and operate at different hydraulic gradients. These major differences in plant design makes the "add on" of Catskill/Delaware to Croton difficult to implement. Finally, as the Catskill/Delaware plant is over six times the capacity of the Croton WTP, it is not practical to consider that the much larger Catskill/Delaware plant as something that can be added to Croton. The scale of the two plants is considerably different.	5.7.3.1.
90.	491	The Draft SEIS does not do a full analysis for the various projects proposed for Eastview. More forthright cost analysis needs to be presented.	The Draft SEIS used the information that was available from at that time from the design of the Catskill Delaware Ultraviolet Facility. Since then more quantitative data are available and will be presented in the Final SEIS.	5.7.3.1.

Item #	Comment Number	Comment	Response	Section Reference
91.	521, 760, 766,797, 856, 884, 926	The Draft SEIS contradicts previous NYCDEP statements that Mosholu would be cheaper than Eastview. The cost is cheaper only if the KCT or Delaware Aqueduct is used. Current cost estimates includes KCT even though that figure is an estimate. The Draft SEIS states that: (1) it is \$20 million cheaper at Eastview vs. Van Cortlandt Park; (2) rate increases for New York City residents would be 3.1% vs. 3.8%; and (3) revenue from Westchester for filtered water would offset taxes charged the City by the locality. The WTP should be sited in Eastview.	All the costs are estimates based on Conceptual Designs. Cost comparisons are based on Life Cycle Costs, which sum both Capital and Operating costs. Since the \$200 million in funding for Bronx parklands added to the Construction Costs, total Capital Costs at the Mosholu Site are higher than total Capital at the Eastview Site with the KCT as the treated water conveyance. Even with the \$200 million in amenities, the Life Cycle cost at the Mosholu Site is less than the Life Cycle cost for the Eastview alternatives, resulting in less total costs for the Mosholu Site. The KCT costs are based on a Feasibility Study and the costs presented are the best available. These differences, as reported in the Draft SEIS, are very minor. The costs described in the comment do not consider the \$200 million in value returned to the Bronx as amenities if the Mosholu Site would be selected	5.7.3.1.
92.	522	A fair comparison of costs between Mosholu and Eastview requires including the cost of the NCA tunnel work.	The NCA Baseline work is excluded in the costs of all project alternatives because this work would take place irrespective of the final siting decision for the Croton WTP. Separate costs to pressurize the NCA for the treated water alternative for the Eastview Site that requires the pressurization of the NCA are added to the project costs for that Eastview Site alternative for the NCA Pressurization alternative.	5.7.3.1. & 6.7.3.1.
93.	667	Projected water/sewer rates are as high as 62% of current levels. City must insure that there is not a dramatic increase in these rates.	This rate increase seems dramatic but is not out of line with the overall level of infrastructure underway in the City. A 3% inflation rate alone accounts for 23% of the increase. New York City water and sewer rates will still be below those of many major U.S. cities, and these costs, as disclosed in the Draft SEIS, only represent a small fraction of housing costs. As an example in FY 2004 the current NYC residential charge is \$526 and in Washington DC it is approximately \$650, in Boston it is approximately \$925, and in Atlanta it is approximately \$1,800. (Data from NYC Water Board Public Information Regarding Water and Wastewater Rates, April 2004.)	5.7.3.1. & 6.7.3.1. & 7.7.3.1.
94.	668	The cost comparison for the three sites is confusing. Little documentation is provided as to how operating costs were calculated. The document does not incorporate projects of the tax burden for the Eastview Site into the calculation of capital and operating costs. It does not include costs borne by upstate water users and carries portion of the costs for a Kensico City Tunnel that possibly should have been omitted. As such, the Final SEIS should present a more complete and fully documented picture of all costs to NYC rate payers due to construction and operation at each of the three site alternatives.	The backup documentation for the cost presentation is in the Appendix. The potential payment of taxes at the Eastview Site was included in the calculation of Operating Costs. This was also included in Life Cycle Costs. Capital Costs did not include these annual incremental costs. Costs to be borne by Upstate users were included for all three WTP site alternatives. The inclusion of costs for the Kensico-City Tunnel is an estimate based on a reasonable assumption of the proportion of the tunnel that would be used to convey Croton water.	5.7.3.1.

Item #	Comment Number	Comment	Response	Section Reference
95.	743	The SEIS should include a study that substantiates their claim that the WTP would be less costly over time than purchasing Croton lands.	NYCDEP does not claim that a WTP would be cheaper than purchasing land. NYCDEP has stated that a WTP provides more reliable water treatment than <u>buying land</u> and that <u>buying land</u> is not considered a replacement for filtration	
96.	750	Cost calculations should include the impact of the cost of the WTP as it contributes to the cumulative effect of the overall \$16.5 billion capital budget. The capital budget has increased 50%, so the cost of the plant as a percentage of that budget (as it's reported in the SEIS) seems lower. However, the absolute tax burden will increase. This must be transmitted in the SEIS.	The WTP would be paid from bonds, paid from ratepayers, not directly from taxes. The impact on water rates is explained in the Draft SEIS.	5.7.3.1. & 6.7.3.1. & 7.7.3.1.
97.	855	Mitigation costs have to be separate. Supply costs, indirect costs, and taxes or PILOTS.	Mitigation costs for many items cannot be predetermined until local approvals are underway.	9.
98.	876	Under the cost description of the WTP at Eastview, the NYCDEP has stated that payment of taxes would not benefit taxpayers in the city. Not true, it is in the interest of city taxpayers to not have one of their neighborhoods decimated by a city project, particularly the loss of precious parkland. To set such a precedent is not in the interest of NYC taxpayers.	The statement is accurate. Payments to Westchester County and the Town of Mount Pleasant are not in the best interest of City residents. This cost must be balanced against the impacts to the Park and other potential impacts at the site alternatives in the Bronx.	
99.	879	In the Executive Summary, an advantage of the Mosholu Site is stated as being construction costs are expected to be lower than the other sites. State how this conclusion was reached. It is anticipated that city based businesses will be used at this site as opposed to Eastview. Historically, contractors use familiar businesses to purchase their supplies. Such businesses could be located anywhere outside city limits. This will not be an advantage to the Mosholu Site. Finally, you say the city owns the site, wrong. The people own the site. It is after all parkland.	The construction costs are shown in the Project Descriptions for each site alternative. The construction workers are likely to frequent nearby businesses. Concrete and some other supplies will be purchased by the Contractor based on cost and convenience. Concrete in particular must be mixed close to the work site, making it most likely that all the concrete will come from suppliers in the City for the sites in the City and it will be purchased from suppliers in Westchester County for the Eastview Site. The City, which is chartered to represent all the people of the City, owns the property.	5.7.3.1. & 6.7.3.1. & 7.7.3.1.
100.	889	The Draft SEIS cites lower anticipated construction costs at Mosholu as an advantage. This statement is not supported in the Draft EIS documentation which states that the construction costs at Eastview are lower.	The construction costs as presented in the Draft SEIS include \$43 million in mitigation and \$200 million in amenities. These are costs that provide value to New York City. The Mosholu Site, with these costs included, is less expensive than one of the Eastview alternatives, and lower in total life cycle costs than the other.	6.7.3.1.
101.	911	It is not stated in the DSEIS that the \$240 million in park improvements is included in the cost of building at Mosholu. It does, however, say that \$290 million of the cost of building at Eastview is for the KCT. If both of these costs are excluded, Eastview is \$69 million cheaper than Mosholu.	The \$243 million cost for mitigation and amenities for the Mosholu Site was added to the construction costs and figured into the calculation of life cycle costs for Mosholu. The \$290 million for the KCT alternative for the Eastview Site was included in the Eastview Site. These are real costs attributed to each alternative, and there would be no logic in removing them from calculations of project costs.	5.7.3.1. & 6.7.3.1.

Item #	Comment Number	Comment	Response	Section Reference
	916	The cost of the plant will be borne by those least able to pay in order to subsidize Westchester developers.	NYCDEP does not see a causal link between the construction of a WTP and benefits to developers.	
102.	932	Cost of building at Mosholu is higher than estimated. Significant mitigations will result in higher costs: <ul style="list-style-type: none"> • Asthma monitoring and treatment. • Double-paned windows and HEPA filters for affected residents. Grants should be available to do this. • Noise barriers and dust repression. Must be effective enough to fully mitigate impacts. Construction standards will have to tighten if asthma becomes a problem. Penalties should be applied for failure to do so.	Mitigation cost and the costs of complying with environmental standards and quality of life commitments are included in the cost estimates.	6.7.3.1.
103.	58, 59, 805	There is no clear analysis of how upstate rate payers will be affected if the project goes to Eastview. There is no indication as to how the 23.6% increase in rates was arrived at, or what the distribution of that burden will be. NYCDEP personnel said that they had no way to assess impacts to upstate rate payers. It is impossible to comment on the DSEIS as there is not enough back-up information provided.	Appendix A of the Draft SEIS provides more detail on the tax rates and other economic factors. The actual water rate calculations were prepared by the City's water rate consultant in the same manner that the develop water rates for each year's payments.	
104.	73	The public will only understand the full scope of the projects when they start to pay elevated water rates. These rates will include the Croton, UV facility, and the police precinct.	The water rates included in the Draft SEIS include the Croton, Cat/Del UV Facility, and the police precinct since all three are included in NYCDEP's plan for the next 10 years.	5.7.3.1. & 6.7.3.1. & 7.7.3.1.
105.	139, 140, 149, 150,151, 178, 179, 180, 193, 208, 209, 210, 221, 222, 223, 224, 234, 249, 250, 251, 257 272, 305, 306	The Bronx has unemployment at 10%. The stock market crash and the attacks of 9/11 have exacerbated this situation. Jobs are needed in the construction industry. The potential for jobs is an important component of this site selection and must be considered. If it can be assured that Bronxites get the jobs, this should be factored into the site-selection equation. This also is a quality of life issue. The plant should be built in the Bronx to improve the quality of life.	Noted.	
106.	259, 578	Have the demographics, especially vis a vis the elderly, been looked at in the vicinity of Mosholu? Woodlawn community is 40% senior citizens on Medicare.	The demographics of neighborhoods in the vicinity of the three sites were presented in the Draft SEIS. The tables used for the analysis are in Appendix A	

Item #	Comment Number	Comment	Response	Section Reference
107.	330	Extra health care providers will be necessary should the plant be built in Mosholu.	The effect of the proposed construction and operation on local businesses and essential services was evaluated in the Draft SEIS. The proposed construction would not be expected to result in significant adverse public health impacts. Please refer to the public health chapter of the FEIS.	6.7.3.1.
108.	331	Jobs are required in Westchester just as much as they are required in the Bronx. Bronx union members may have to travel to Westchester for their jobs.	Noted.	
109.	576, 582	More affluent people will leave the Mosholu area as construction begins. This will diminish the diversity of the area.	An evaluation of the effects of the proposed action on socioeconomic conditions in affected neighborhood was included in the Final SEIS. Although construction is disruptive, it is temporary and not expected to result in indirect displacement.	6.7.3.1.
110.	580	Property values in Mosholu will diminish as a result of the construction.	Property values would not be expected to be significantly adversely affected. The potential adverse impacts during construction would be minimized through various quality of life insurances planned as part of the proposed project. Positive benefits of the amenities programs might, in fact, have more influence and longer term benefits from all of the parkland improvements.	6.7.3.1.
111.	749	The SEIS should include the socioeconomic impact of the cost of the WTP to low income residents, and not as an across the board average.	Each of the three Socioeconomic sections of the Draft SEIS considered the impact of each site alternative on the lowest income group in the Bronx.	5.7.3.1. & 6.7.3.1. & 7.7.3.1.
112.	770, 470	The well-being of residents and 25,000 local residents must take priority over jobs for union members. Agreements should be made between NYC and Westchester locals.	The siting decision will take the welfare of all groups into consideration.	1.5.2.
113.	777	The only people to benefit from construction at Mosholu will be union workers, most of who do not live in the community. An agreement should be worked out between the City and Westchester to guarantee a percentage of workers from the City.	The people to benefit will be the Croton water users in NYC and upstate. As indicated before, NYCDEP cannot itself dictate from where workers would come.	
114.	859	For the Eastview Site, existing versus future taxes paid by the City to Westchester should be disclosed.	The City would agree to make payments in lieu of taxes to the Town of Mount Pleasant and to Westchester County if the Eastview Site were selected. These costs are listed in Section 5.7.3.1.1. Additional backup for these estimates is in Table 5.7 -10 and Appendix A of the Draft SEIS.	5.7.3.1.

Item #	Comment Number	Comment	Response	Section Reference
115.	860	The Final Scope of Work stated that a description of number of jobs, job types etc. for each site would be included in the Draft SEIS. Where is this located in the SDEIS? Describe how the jobs connected to the project address the Bronx's real job needs. Review Bronx unemployment data to ascertain how these construction jobs will lower the unemployment rate (10% since October 2002). Will these jobs benefit a few "privileged" people at the expense of the hardest hit economic group -- the thousands of poor, single, working Bronx moms who will probably miss more hours of work due to their kids' asthma attacks instigated by construction impacts?	Section 6.7.3.1.1 describes fifty-three permanent new jobs that would be created at the proposed WTP at the Mosholu Site. Similar sections are in the Draft SEIS for each site. The jobs range from maintenance jobs to administrative and managerial. The economic value of these jobs is discussed, and the backup calculations, assumptions, and tables are provided in Appendix A. A table on Page 104 of Appendix A lists all the proposed permanent jobs, salaries, and tax payments.	6.7.3.1.
116.	861, 890, 929	The Final Scope of Work states that NYCDEP cannot guarantee jobs at the proposed site to City residents. Why is the assumption that the jobs would go to City people listed as an advantage of the Mosholu Site in DSEIS?	Section 6.7.3.2 explains that the new workers are most likely to live closer to their jobs. This was intended only as a reasonable assumption. No guarantee that the jobs would go to City workers was assumed.	6.7.3.2.
117.	862	The Final Scope of Work states that an analysis of the socioeconomic impact as a percentage of income will be included in the DSEIS. Where is this information located in the DSEIS?	The Socioeconomic sections for each alternative sites have an analysis of the rate impacts as a percentage of housing costs because water costs are normally associated with housing costs. For example, for the Eastview Site, Table 5.7-15 lists the rate increases that would occur as a percentage of median monthly income for the two treated water alternatives for residents in each Borough. Table 5.7-16 shows the impacts as a percentage of housing costs for owner-occupied dwellings. The text in each section describes the impact of water rate increases specifically on the lowest income residents (annual income of \$12,000 per year) and concludes that water and sewer costs would go from 6.4% to 6.7% of income for this most impacted group. More tables show the impacts on Upstate residents. Similar tables are in Section 6.7 (Mosholu Site) and 7.7 (Harlem River Site).	5.7. & 6.7. & 7.7
118.	432	Construction at Mosholu/Jerome Park Reservoir should not be undertaken for the sake of NYC's declining school system, an increasingly difficult job market, and for the sake of the community.	The project is an important health-based infrastructure improvement.	6.19.2.4.
119.	751, 753	Water rate money paid by users in all boroughs should not be used for park improvements in the Bronx.	If the WTP were sited in Mosholu, an amenities plan would be paid from water rates. This is justified as a required cost of obtaining the Mosholu Site.	6.7.3.1.
<i>Land Use, Zoning, and Public Policy</i>				
120.	49, 168	NYCDEP has violated zoning issues and requirements for the Mosholu Site. Any real estate deal must go through a process that is transparent to the law.	The previous ULURP approved the proposed action of constructing a below-grade WTP within the same area that is currently being proposed. The new plan falls within the past approval. The City's prior assertion that alienation was not required was not related to or conditional upon the ULURP approval.	6.2.3.1.2.

Item #	Comment Number	Comment	Response	Section Reference
121.	187	Taking of park land at Mosholu should be the last resort when there are no other viable options.	Upon completion of construction the park would, largely, be restored on top of the below ground WTP with an improved driving range.	1.5.2.
122.	200, 280, 378, 379, 381,398, 399, 408, 411, 417, 418, 423, 425, 436, 437, 440, 530 444, 512, 517, 548, 583, 587, 589, 590,607, 618, 621, 763, 764, 765, 775, 957	Eastview is owned by NYC and zoned for industrial use whereas Mosholu is irreplaceable parkland. Eastview is a more viable option. Mosholu will be affected by the noise, traffic and degraded air from construction trucks and by trucks delivering hazardous materials once the plant is operating. Eastview is an industrial facility and would not be affected by these problems. The population near Eastview is 3,168 but around Van Cortlandt it is 26,192. Van Cortlandt is a residential area. Eastview is a more appropriate site as it's not a residential area, is zoned for commercial use, is virtually vacant, studies show it's cheaper, underground drilling is not needed, there's no loss of parkland, and the people of Mount Pleasant do not object.	The Eastview Site is zoned Office/Business. There is a Special Use approval required to use the site for water supply uses. A discretionary local site approval by the Town of Mount Pleasant is still required. Truck traffic would have to travel more extensively on local streets within neighborhood commercial establishments than at any other site alternative. Other factors need to be considered, such as, deep rock drilling that is required at Eastview for the underground pump station and the tunnel connection to the NCA. The determination of where to locate the plant is based on many variables, including zoning issues. NYCDEP, as lead agency, makes the final site selection based on the potential environmental, social, and economic impacts at each site alternative.	5.2.2.1.2.
123.	512	The Draft SEIS unfairly emphasizes uncertainties of Eastview's permitting process despite the fact that Eastview would benefit if it expedited the process.	The concurrent application for the anticipated Catskill / Delaware UV Disinfection facility and the pending Croton Water Treatment Plant complicates Mount Pleasant's site plan approval process, which is, as stated in the DEIS, always uncertain.	5.2.2.2.1.
124.	636	Disclose the management agreement regarding which City Agency will control and be responsible for the site at Van Cortlandt Park.	This agreement is still under development. The management of the site is likely to be shared by NYCDEP and NYCDPR.	
125.	637	If the WTP is built at Mosholu, can there be any other activity at the site other than those approved by NYCDEP?	It is expected that NYCDEP will want to review activities that affect the area within the permanently alienated area. NYCDEP would exercise the most scrutiny for compatibility of proposed programs on the areas immediately adjacent and above the WTP footprint.	6.2.3.1.1.
126.	638	NYCDEP previously obtained a ULURP approval while maintaining that alienation was not required. NYCDEP now states that another ULURP process is not required. Document basis of asserting that NYC land use and zoning requirements have been addressed.	The previous ULURP approved the proposed action of constructing a below-grade WTP within the same area that is currently being proposed. The modified plans are covered by the past approval. The City's prior assertion that alienation was not required was not related to or conditional upon the ULURP approval.	5.2.3.1.2. & 6.2.3.1.2. & 7.2.3.1.2.

Item #	Comment Number	Comment	Response	Section Reference
127.	639	Provide exact language of old ULURP application and approval. How did the old ULURP address parkland alienation and removal from Parks NYCDEP's control to NYCDEP?	The December, 1998, ULURP application for the Mosholu Site does not mention parkland alienation. The approval of this ULURP action included a binding City Council Resolution passed July 21, 1999. This Resolution included commitments for NYCDEP to support several NYCDPR projects but it did not mention the issue of control of the property. On March 11, 2000, a Memorandum of Understanding was executed between NYCDPR and NYCDEP that addressed this issue. This MOU stated in general terms only that "...DEP will return the property to park use, enhancing exiting facilities at Mosholu Golf Course and Driving Range..." This MOU was subsequently terminated after the Court determined that alienation was required. A new MOU would be emplaced if the Mosholu Site is selected.	5.2.3.1.2. & 6.2.3.1.2. & 7.2.3.1.2.
128.	640	How did the old ULURP address rezoning of land to allow construction and operation of an industrial facility in a park, adjacent to residences and community health facilities?	The 1998 ULURP approved site selection of a public water treatment facility. The proposed facility was not determined by NYCDEP or NYCDCP staff to be inconsistent with the surrounding zoning.	5.2.3.1.2. & 6.2.3.1.2. & 7.2.3.1.2.
129.	661	Advantages of the Eastview Site: <ul style="list-style-type: none"> • Easiest to build on. • Consistent with local zoning • All of city's water would be at same pressure giving operational flexibility to water suppliers. 	Noted.	1.5.2.
130.	670	Section 8.2, p.42-43 of the Draft SEIS attempts to limit Harris Park Annex's park status. This should be designated as 'park land' as land use maps show it to be.	Although the Harris Park Annex is shown as parks and recreation/open space land use according to New York City Department of City Planning Land Use Maps, a majority of the land adjacent to the reservoir is not mapped as parkland, including the Harris Park Annex.	8.22
131.	671	All of the land east of Jerome Park Reservoir and to the eastern edge of what is now Goulden Ave was originally Parcel 4 of the reservoir lands (1895). A 1917 deed stated this land should only be for "park and highway purposes." The Lehman College Student Parking Lot, H.S. of American Studies, the Demo WTP are all in violation of the Harris Park deed and should be removed.	NYCDEP does not entirely agree with the accuracy of this comment, but it is noted for the record.	
132.	672	NYCDEP received a 5-year permit in 1983 to use Harris Park (west of Goulden) for staging for the construction of the dividing wall, demonstration WTP, and pipe connections. This permit has been continually extended. NYCDEP must restore this area.	The water supply distribution system connections in this area are essential to the City. The demonstration plant will be removed and this land will be made available for public uses. The area around the pipe connections has been restored. However, in the past, and in the future, NYCDEP will require temporary access to this area for the maintenance of the City's infrastructure.	6.2.2.1.1.

Item #	Comment Number	Comment	Response	Section Reference
133.	673, 468	The City must apply for the needed permits at JPR, ULURP the alienation and describe the impact on zoning. The introduction of potassium permanganate at Gate House No. 5 would require ULURP.	All existing and proposed uses for JPR and its associated structures are for water supply uses and are consistent with NYCDEP's current authority to exist at these sites.	8.2.1.2.
134.	674	Discuss security requirements at JPR, the impact of those requirements on the reservoir's status on the State and National Registers of Historic Places, or eligibility as a NYC landmark. What effect will the new security have on public access?	Security improvements to Jerome Park Reservoir are being conducted as a separate action and not part of the Scope of this SEIS.	
135.	675	Table 8.2-8 and the text on p. 48 states that 158 acres of the 249 acres listed on the table are golf courses. This land is not accessible to the public. The remaining acreage leaves the Jerome Park Community underserved with parkland.	The golf courses are public and considered park uses.	6.5.3.1.
136.	676	The imminent change in the use of the reservoir presents an opportunity to reverse restrictions on public access and to return it to its original design as a JPR a reservoir-park. This would be a tremendous benefit to the community.	Plans for use of the JPR in the future are currently being considered.	8.2.3.4.1.
137.	845	As expressed in the Draft SEIS, the land is not being alienated from the Parks Department and will remain under the Parks Commissioner's control. If the land is used as parkland, and all facilities are "park-like," then the assumption that the previous ULURP applies is correct. If the premise is wrong, then a new ULURP must apply. This issue was raised in the FSOW but not addressed in the DSEIS.	The land would be alienated, but an MOU will maintain the general use of the Mosholu Golf Course as a golf course and driving range, under NYCDPR control. The previous ULURP would apply since the ULURP approved the site selection of the site for a WTP and that is what is proposed.	6.2.3.1.2 and 6.5.3.1.
138.	846	The Final Scope of Work states that the 1999 ULURP will be described in the Draft SEIS. Please document and reference the volume, chapter and page number. Since neither the CD-Rom nor the hard copy (no index) is searchable in total, it is very difficult for the public to review. This issue was raised in the FSOW but not addressed in the DSEIS.	Page 21-22, Section 6.2.3.1.2, zoning, describes the alienation. The previous ULURP action is noted, and page 22 states that "The site was selected for the express purpose of siting the Croton Water Treatment Plant pursuant to Uniform Land Use Review Procedure (ULURP) approval." Please see this section for a summary regarding the 1999 ULURP process. NYCDEP is limited by the physical boundaries of the 1999 ULURP and must adhere to the intended purpose called out in that ULURP. The proposed project is not anticipated to result in any significant adverse impacts on land use or public policy.	6.2.3.1.2.
139.	848	There is no explanation of zoning. This issue was raised in the Final Scope of Work but not addressed in the Draft SEIS.	Zoning of the WTP site after the alienation is described in Section 6.2.	6.2.

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140.	851	Zoning Resolution 73-14 allows a pumping station provided the use serves the residential area within which it is proposed to be located. This is not the first time the NYCDEP has been advised of this requirement. In fact, in 1984, the NYCDEP was required (by the Building Department) to go to the BSA for a variance for the Demonstration Water Treatment Plant (and its 3 MGD pump). The NYCDEP was granted an address for the Demo Plant and a five year variance on the location. This issue was raised in the FSOW but not addressed in the DSEIS.	This Special Use is not applicable to a city-wide water treatment plant facility.	
141.	858	Change of Parkland Status legislation was not discussed in the SDEIS. This should be discussed in the Land Use section.	An expanded Section 6.5.3.1 Land Use will be in the Final SEIS that adds more detail to changes in land use that would occur at the Mosholu Site. It includes a description of the change in use of the alienated land.	6.5.3.1.
142.	871	The Final Scope of Work states the proposed parking lot is authorized by the 1999 ULURP. ULURP needs to be redone if the Mosholu Site is chosen. If legislative requirements are fulfilled, the land will be alienated. The alienation needs to be ULURP'd. Meanwhile the 1999 ULURP states the parking is in the building.	Parking was removed from the building in order to reduce project footprint, simplify compliance with Fire Department regulations by removing combustion sources, and reduce costs and construction time. NYCDEP believes that the intent of the 1999 ULURP approval is still very applicable, since the ULURP approval in 1999 was for site selection of the site for building a water treatment plant and not for building a parking lot.	
143.	891	The assumption that zoning issues will not threaten the construction schedule is used as an advantage in favor of building at Mosholu. This is an assumption. Site approval is dependent upon the resolution of the zoning issue. This should not be listed as an advantage.	NYCDEP believes that further formal public land use approval processes and zoning approvals are unnecessary for the Mosholu Site, as the ULURP for the Site Selection has already been approved. In contrast, the Harlem River Site must complete the ULURP process and the local approval for the Eastview Site is without any mandated timetable.	6.2.3.1.2.
<i>Hazardous Materials</i>				
144.	97, 264, 340, 687	A chemical-filled building with trucks unloading hundreds of thousands of pounds of hazardous chemicals everyday will be built right next to a picnic area and playground at the Mosholu Site. These chemicals will be transported to, stored at, and used in the plant.	The Draft SEIS described the deliveries and storage of chemicals. These chemicals all will be stored, transported, and used in a manner that complies with stringent local, state, and federal regulations. In addition, this plant is underground and the public will not have access or exposure to any chemicals used at the site. The fill station will also be restricted from public access.	6.13.3.1.
145.	263	A 16-foot wall with vents blowing out chemicals 24 hours a day will be constructed at Mosholu	The WTP would not emit smoke or airborne pollutants. The only emissions would be from the boilers for space heating, and these emissions are similar to those from a school or hospital. Much of the below-grade process area would not be heated, so these boiler emissions are not considered a major source. There is no need for special treatment of the exhaust air from the ventilation fans, as they are just ventilating the work space.	6.13.3.1.

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146.	484	The Draft SEIS states that 700 hazardous material spills have taken place near the aqueduct. However, no facts were provided in the SEIS regarding any findings of pollutants, contaminants, etc.	The SEIS reported that if the NCA is to convey treated water it must be pressurized to prevent the infiltration of any contaminants.	3.4.1.2.
147.	492	The Draft SEIS does not adequately provide information on the effects on human health of chemicals required for water filtration. The Draft SEIS does not present references to experiences of other communities that filter water using similar chemicals as those proposed for the Croton WTP and their effects on human health.	The chemicals used for the treatment of water are described in the Draft SEIS. All of these chemicals are used by water treatment plants around the world. Their use in operations is nearly universal; the chemicals all end up diluted thousands of times in the water supply and safely consumed.	3.3.2.
148.	933	None of the Westchester County Sewage treatment plants accept discharge containing aluminum. Alternative means of disposal are required.	Alum residuals would be trucked off site. It is not anticipated that the low levels of aluminum in the centrate being discharged into the sewer would pose a problem for Westchester County sewage treatment plants.	6.13.3.
Public Health and Safety				
149.	3, 35, 166, 205, 235, 236, 317, 326, 339, 424, 457, 513, 545, 553, 563, 564, 575, 622, 623, 632, 919	The hundreds of trucks, and dust from digging, drilling, and blasting at the WTP sites and JPR will exacerbate already high asthma rates in the Bronx. Higher mortality rates will result. The plant does not belong in area with so many children. The Draft SEIS, however, maintains there will be no significant adverse impacts.	Asthma in the Bronx, received special consideration in the air quality and public health sections of the Draft SEIS. The State has promulgated tough air quality standards to avoid health impacts. The analysis of the proposed construction was treated as if it would be a long-term impact as opposed to a short-term construction related one and therefore the impacts during construction related activities was quantified, and the projected emissions of particulates would still fall below the threshold at which health impacts would occur.	6.19.2.3.
150.	16, 80	The plant will have severe environmental impacts as well as endangering human health whether built in the Bronx or Westchester.	The purpose of the SEIS is to fully determine, evaluate, and disclose the potential for these types of environmental impacts.	
151.	34, 24, 318, 324, 416, 442, 624, 634	Construction activities in the Bronx will drive rats into the local community.	A rodent control expert was retained by the NYCDEP to evaluate the risk of rats and rodents encroaching on local neighborhoods as a result of construction activities. The Draft SEIS (Public Health sections) describes that the sites in the Bronx are not currently good rodent habitat, so that the proposed activity would not drive rodents off the site and into neighborhoods. The real concern is that rats can be attracted to the debris on a construction site, increasing the existing local rodent population. A rodent control plan would be instituted by NYCDOHMH, NYCDOS, and NYCDPR and supported by NYCDEP so that an increase in the existing local rat population would not ensue.	6.19.3.
152.	241	There are parasites in the water that constitute a health hazard requiring filtration.	There is currently no health risk from parasites associated with the consumption of Croton water. However future regulations require additional treatment to minimize any risk from parasites.	2.3.1.

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153.	551	There is a possibility of gas explosions or chemical spills. How fast will the neighborhood be able to be evacuated? What contingencies have been made for this eventuality?	The use of gas would not be an integral part of plant operations. Natural gas would be used for heating, but this is similar to the use of most large buildings. No gasoline would be used in the facility. No flammable chemicals are to be used. Controls are in place as part of an operating plan to contain and manage chemical spills. Any such spill would be wholly contained within the plant. No contingencies are necessary for a neighborhood evacuation plan.	6.13.3.1.
154.	552, 566	What are the long term health effects of exposure to toxic chemicals being used at the plant? What are the long term effects of exposure to blasting and drilling?	These potential impacts are described and evaluated in the Draft SEIS. There would be no public exposure to toxic chemicals as a consequence of the proposed construction or operation of the WTP. Noise from rock drilling will have no adverse impact on the health of neighbors. Due to the distance, noise level increases from anticipated drilling noise would attenuate to levels that will likely be lost in the ambient background noise. Blasting noise, however, would be more apparent as a result of the nature of this noise quality being different than the typical background noises due to traffic and elevated trains and may be heard and felt within the community, however this type of elevated noise level increase is not anticipated to result in public health concerns because it is sporadic and more instantaneous in nature. Health effects related to an increase in noise levels are more typically associated with long term exposure, not likely, or anticipated with the engineering controls planned as part of the proposed project. Modern blasting techniques incorporate delay blasting, which consists of reducing a single blast to a series of smaller blasts through the use of millisecond delays. This technique is an effective vibration control method. Blasting is conducted underground within the bedrock (a major noise attenuating material in itself). Noise levels within the golf course itself are anticipated to be more elevated than they would be at the closest residential and other sensitive receptors, but as it is not expected that long term exposure to these park users would occur, these potential significant noise level increases would not be expected to result in chronic health effects. The blasting would all occur below ground and the drill holes would be covered by heavy mats that prevent fly ash from ejection upward.	6.13.3.1.
155.	554, 555, 556	Surgery and patient care will not be possible with the blasting and noise.	In several recent projects, controlled blasting methods were used to excavate rock near operating hospitals. In 2001, a large rock excavation was done within 100 feet of the University of Minnesota Medical center in St. Paul. The building was not excavated. In 2003, blasting was also done safely near the Medical center in Wawatosa, WI. Normal surgery activities and patient care activities should not be affected by controlled rock blasting at the Croton WTP site.	6.10.3.2.
156.	561	What are the health effects of filtered water? Cancer rates are high in Long Island and New Jersey despite filtered water.	The causes of cancer are very difficult to determine. NYCDEP does not assert that filtering the water will lower cancer rates; but the removal of Disinfection Byproducts would eliminate one risk factor.	2.3.2.1.

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157.	664	<p>A concern with the Eastview Site versus Bronx sites is that, given the longer travel time from the WTP to the distribution point, water would require repeated doses of chlorine in order to insure that micro-organisms do not multiply in filtered water. This may cause DBPs to rise which is a potential health issue.</p> <p>The Final SEIS therefore should provide, as a mitigation measure, a detailed strategy insuring that there would no rise in DBPs at the tap due to siting at Eastview.</p>	<p>Formation rates of DBPs would be much lower in water that was filtered, because the DBP precursors are largely removed by the flocculation and filtration process. Pilot testing and measurements of DBP formation potential have shown that DBPs would be very low after filtration even with the longer travel time from the Eastview Site.</p>	3.11.3.
158.	693	<p>Even if WTP was started immediately, it would take 8-10 years to build. NYCDEP's failure to institute protective measures represents a danger to public health.</p>	<p>The construction schedule for the WTP is approximately 5.5 years. Mitigation and protective measures for both construction and operations at the plant will be implemented as necessary.</p>	9.1. & 9.2. & 9.3.
159.	756	<p>SEIS should include comparison of risks from contamination found in storm water vs. risks of DBP.</p> <p>Issues should include:</p> <ul style="list-style-type: none"> • Risks of Disinfection By-products are controversial and inconclusive (1998 GAIA Institute paper and 1999 EPA hearings). • Proposed action would induce watershed development that, in turn, will increase the need for greater amounts of filtration • Development will increase storm water runoff causing proven carcinogens to enter the water supply. Pesticides constitute single largest source of surface water pollution. <p>SEIS is incomplete in that it does not evaluate advantages and disadvantages of filtering the water.</p>	<p>These risks have been reviewed and considered by the USEPA. They promulgated regulations for the control of DBPs that the City is obligated to follow as a supplier of water to a public supply. The USEPA and NYSDOH have mandated filtration as the only sure means of removing contaminants. The SEIS is a review of potential impacts of building and operating the WTP at alternative sites. Its Scope does not include a review of federal and state regulations for public drinking water quality.</p>	3.11.3.
160.	864	<p>The Final Scope of Work states potential health impacts (if any) from engine emissions, dust etc. will be considered in the Draft SEIS. These impacts are not adequately addressed. Consider current research and studies (especially on diesel air emission adverse affects) should be included in evaluating potential health impacts at the Mosholu Site.</p>	<p>The public health sections for each site do discuss the potential for diesel fumes and other airborne irritants to exacerbate asthma. The air quality standards promulgated by the State and federal EPA are believed to be protective of human health. The project will not exceed these standards. The interim guidance criteria for determining the potential for significant adverse impacts from PM2.5 include a predicted incremental ground-level impacts of PM2.5 greater than 0.1 µg/m3 on an annual average neighborhood-scale basis. Actions that would result in predicted incremental PM2.5 impacts greater than the interim guidance criteria above will be considered to result in potential significant adverse impacts.</p>	4.11.1.2.4 & 5.19.2.4.1. & 6.19.2.4.1. & 7.19.2.4.1.

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161.	972	The sewer lines that carry wastes to Hunt's Point overflow when it rains. The additional wastes traveling through the sewer from the WTP will exacerbate the situation, putting children in direct contact with chemical waste.	The mixed solids for the WTP at either the Mosholu or the Harlem River Sites would go through a new pipeline directly to the existing sludge treatment facility at the Hunt's Point WPCP. This conveyance and treatment plan would bypass all sewers and the primary and secondary treatment facilities referred to in the comment.	3.5.3.2.
162.	947	The Final SEIS should commit to developing a pest management plan designed to control pest-related problems arising from the proposed construction.	This commitment is in the Draft SEIS and is carried forward into the Final SEIS. This plan is under development by the NYCDOS	6.19.3.
<i>Open Space / Community Facilities and Services</i>				
163.	144, 145, 171	For Mosholu, parks must be protected for the public use and good. This is what it means to protect the environment: preserving air quality, quality of life around residences. In Eastview, there are no residences near the site. Mosholu has thousands of residences.	NYCDEP intends to preserve and protect the existing park uses if the Mosholu Site is selected. There are nearby institutions, including a hospital, juvenile center, and penitentiary that are considered residential receptors adjacent to the Eastview Site. Also, truck routes would affect numerous residences.	6.5.3.1.
164.	147, 194, 207, 298, 307, 322, 627, 628	Job creation is not the issue – protecting the environment and public (per CEQR) and the park is the key issue. An ill-conceived idea does not warrant construction jobs.	Noted	
165.	165	SEIS makes no mention of the Mosholu [Montefiore] Community Center. It claims that it doesn't exist, whereas in fact it does.	Community facilities will be re-examined and updated for the Final SEIS.	6.4.2.1.2.
166.	171, 659, 175	The proposed construction project at Mosholu will disrupt park uses. Whereas impacts will be for the most part, temporary, some will be long-lasting (such as felling of ~460 mature trees. The Draft SEIS does not adequately specify and commit to mitigation measures with regard to park impacts. An aggressive mitigation program to off-set impacts to the local community must be ensured.	NYCDEP believes that the analysis and mitigation measures are adequate. Details of the plans are still being developed by NYCDPR and the NYCDEP, but the level of commitment is unprecedented. The proposed project at the Mosholu Site would require the cutting of 278 trees. Another 106 at the Mosholu Site are listed as "threatened" because they are within twenty feet of the construction limit.	6.14.3.1.1.
167.	252	Many projects have been built successfully under NYC parks in the past. This work will not be a problem.	Noted	
168.	261, 958	Building in parks sets a dangerous precedent that open spaces may be used for active industrial facilities. Would this work be done in Central Park?	This is not the first time that projects have been performed in NYC parks. It is also important to realize that this is not an industrial facility. It is a drinking water filtration plant.	
169.	277, 278	It is disputed that the Mosholu Site will be put back to its present condition. Trees will be destroyed and soil removed making replanting impossible. The park will be useable as a driving range but not for any other use.	The WTP will be sited under the driving range of the golf course. The forests of Van Cortlandt Park will not be altered. Natural resources lost during construction (such as trees in Mosholu) will be replaced and restored.	9.2.4.1.
170.	338	Woodlawn Cemetery would be affected by the construction at Mosholu.	The analysis in the Draft SEIS shows that no actions would occur in Woodlawn Cemetery. It is acknowledged that truck traffic along Jerome Avenue could temporarily be noticed by visitors in Woodlawn Cemetery.	6.2.3.2.1.

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171.	406, 420, 965	Harris Park would be torn up for years and several acres of Mosholu would be disrupted or even permanently lost. Goulden Avenue will be also be torn up.	There is no action planned for Harris Park or Goulden Avenue. Harris Park Annex is the strip of land west of Goulden Avenue adjacent to Jerome Avenue. There is connection and pipe work proposed for Harris Park Annex. It is true that part of the Mosholu Golf Course would be disrupted for 5.5 years if the Mosholu Site is selected.	6.2.3.2.1.
172.	509, 574, 620, 960	Building in Mosholu will represent a permanent loss of green space that is very important to the local community.	Approximately 2 acres at the golf course would be permanently lost as part of this project if the Mosholu Site is selected. To off-set effects of the proposed project, such as this, NYCDEP would provide \$243 million for mitigation and park improvements throughout the Bronx.	6.2.3.2.1.
173.	581	Will NYPD and FDNY have the facilities to respond to chemical spills, etc.?	The Community Facilities section of each site alternative describes the available emergency responders for each site alternative, including NYC services in the City and local facilities Upstate.	5.4.2.1.5. & 6.4.2.1.5. & 7.4.2.1.5
174.	335, 336, 625, 660, 748, 948	<p>Recommendations from this comment include:</p> <ul style="list-style-type: none"> • Final SEIS should specifically commit to fully rebuilding golf course and disturbed landscape. • Should spell out details of reforestation/monitoring program. • Final SEIS should set forth details of the \$243 million commitment with a multiyear timetable. 	NYCDEP has previously committed as part of the ULURP approving the project as well as the Draft SEIS to the restoration and rebuilding of the driving range, golf course, and all disturbed areas in a timely fashion upon completion of construction. The restoration of natural resources and replacement of trees and the reforestation plan would be at the discretion of NYCDPR and would include activities that would improve on the urban forest's health. NYCDEP is committed in the City Council Resolution that approved the ULURP action for the Mosholu Site to transfer \$43 million for various mitigation efforts. Part of this commitment allocates \$17 million for a reforestation program for Bronx parks. The details of this plan are to be developed by NYCDPR. The monitoring plan was developed in 1999 when the Mosholu Site was first selected. It includes a minimum of two years of pre-impact monitoring, monitoring during construction, and three years of post-construction monitoring. The pre-impact monitoring was completed in 2000 but re-initiated in 2003 when Mosholu was reconsidered as one of the site alternatives. The remaining \$200 million of commitments is not intended as mitigation for specific impacts, but is to provide amenities to the host community that would be losing partial access to the Park and that would be hosting the construction. The details of the remaining \$200 of amenities commitments to NYCDPR projects will be made public when the interagency MOU is completed.	9.2.4.1.

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175.	829	How does Eastview have impacts and Mosholu not? "Reasonably related short-term, long-term, and cumulative effects, including simultaneous or subsequent actions that are in a long range plan" may be considered for impact significance. A park is a community's long range plan. Unfortunately, the agency does not see it that way.	The Draft SEIS concluded that there would be no significant adverse impacts to the community plan if the Mosholu Site is chosen. The future uses of the Mosholu Golf Course would be consistent with the existing use.	6.2.3.1.1.
176.	865	The Final Scope of Work states that inventories of schools, hospitals day care centers etc. will be updated in DSEIS and information will not rely solely on 1999 EIS. Updated inventories are incomplete and for one, do not include the new High School of Dance in the Mosholu neighborhood.	This facility will be added, and the entire list will again be reviewed	6.4.2.1.1
177.	866	The section in the Draft SEIS on loss of parkland, compensation as stated in the legislation and the impacts of parkland alienation is woefully incomplete and deficient. Where is the MOU? Where is the discussion of impacts of parkland loss/alienation?	The MOU is not complete and is still being negotiated by the parties. The impacts to parkland are in Section 6.2.3.1.1, Land Use, of the Draft SEIS. Alienation is discussed in Section 6.2.3.1.2.	6.2.3.1.1 & 6.2.3.1.2.
178.	559, 924, 964	Park use at Shandler Recreation Area will be disrupted by construction at Mosholu.	No direct construction activity would be planned at the Shandler Recreation Area. There would be a temporary golf clubhouse located in the picnic grove on the south side of the Shandler Recreation Area. The current use of the parking area by the Montefiore Hospital would be replaced with construction parking during the work days.	6.2.3.1.1.
Construction Impacts				
179.	33, 443, 549, 579, 586	Montefiore Hospital, North Central Bronx Hospital, students, and residents in the Mosholu area will suffer environmental effects of 8 years of construction. Quality of life will be affected by constant construction, noise, traffic, litter.	Construction is scheduled to extend for 5.5 years. The Draft SEIS evaluation did not indicate that significant impacts to the community facilities would occur. The quality of life issues would be monitored during construction and would be stipulated in all the construction contracts. NYCDEP would work with communities to monitor any potential impacts to the community.	6.4.3.2.
180.	37	Eastview construction will adversely impact the Ruth Taylor Geriatric and Rehab Inst., Westchester Medical Center, NY Medical College, County jail, and Klein Dale Children's Hospital, and Westchester Executive Park.	The Draft SEIS evaluation did not indicate that significant impacts to the community facilities would occur. The quality of life issues would be monitored during construction and would be stipulated in all the construction contracts. NYCDEP would work with communities to monitor any potential impacts to the community.	5.4.3.2
181.	271, 407	Mayor Bloomberg has acknowledged that people in the immediate area of Mosholu would be disadvantaged by this construction.	Noted.	
182.	303, 304, 955	Current technology would allow the plant to be built without disrupting the neighborhood, increasing pollution or asthma. Dust from blasting will be negligible. Transport to and from the site will be via the Deegan, minimizing induced congestion.	Noted.	

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183.	328	Unlike Mosholu, building in Westchester will result in no rat problems, no additional truck problems, no asthma, no trees being cut, and no exhaust problems.	Each of the sites has these disadvantages to them. It is the purpose of the SEIS to help quantify advantages and disadvantages at each of the sites.	1.5.
184.	477	The Draft SEIS characterizes impacts at Eastview after the plant completion as significant, but understates adverse impacts during construction at Mosholu.	The Draft SEIS does not characterize impacts at Eastview as significant during operations (after construction). It states that the construction impacts could be significant when combined with impacts from other projects that could be constructed at the same time on the same site. Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	
185.	526, 612, 959	Construction for the dividing wall at JPR created air, noise, and traffic issues, rat infestation. Requests for redress were not met. This will happen again if construction occurs at JPR and/or Mosholu.	The dividing wall construction is qualitatively and quantitatively different than that proposed around the JPR as part of this work. The proposed work is far more minor in scope and duration.	8.2.3
186.	718	Construction at Mosholu will result in increased mortality from asthma. A low-income neighborhood will lose one of its few amenities (the park).	Asthma in the Bronx, received special consideration in the air quality and public health sections of the Draft SEIS. The State has promulgated tough air quality standards to avoid health impacts. The analysis of the proposed construction was treated as if it would be a permanent impact, and the projected emissions of particulates would still fall below the threshold at which health impacts would occur. The park would remain open during construction. The driving range would be made available at another part of the golf course during construction so this facility would be displaced, not closed. The driving range is currently not open to the public without paying a fee.	6.19.2.3.
187.	767	Projected construction deadlines are typically not met. Target date of 2011 (for Mosholu) will likely not be met.	The current schedule anticipates a 5.5 year construction period. The Consent Decree carries penalties for construction delays, and the Contractors would be penalized if they do not meet the schedule.	2.3.5.
188.	934	Excavation activities may cause vibrations and such vibrations may affect sensitive electronic equipment.	Vibrations from tunneling machines have not been reported to cause problems with medical and research equipment in the many miles of tunneling completed by the City. Nonetheless, these activities will be carefully monitored. The excavation at the construction site is similar in type and size to the expansion work recently completed without reported impacts on equipment by the Westchester County Hospital.	5.10.3.2.2. & 6.10.3.2.2. & 7.10.3.2.2.
189.	971	The proposed eight-mile pipeline that will carry solids to Hunt's Point will create construction-related disturbances the full length from the northwest Bronx to the southeast Bronx.	There would be two 10-12 inch pipelines (one standby) installed in the street right-of-way with trenching equipment. This work is similar to the street work that commonly takes place throughout the City. No single location would be impacted for more than a few months, and the actual work area would only be a few blocks long at a time.	3.5.3.2.

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Engineering Considerations				
190.	780	The Croton System should be shut down completely and used only for emergencies. The Catskill/Delaware should be used the sole source for normal demand.	The Croton System is critical to meeting the City's current and future water supply needs, both for routine use, droughts, and emergency contingencies. Relying solely on the Catskill/Delaware for normal use is not an option.	2.3.
191.	507, 808, 810	NYCDEP has used the Draft SEIS only to facilitate site selection. It does not, however, justify its selection of DAF. DAF being approved in 1999 is not sufficient because there is new information regarding DAF and other methods of filtration that have less environmental impacts and that were not considered. However, new information on membrane filtration, specifically regarding water quality, operation, removal of pathogens, environmental impact, cost, risk suggest membrane filtration to be a better system.. SEQRA demands that environmental effects be minimized or avoided, but NYCDEP has failed to do this.	The Stacked DAF filtration method was selected in 2002 and was reviewed by an external Value Engineering team as well as the consulting engineers and NYCDEP. It was selected as a means of filtration that meets project goals and optimizes water quality, environmental impacts, and cost. Its selection and advantages are described in Section 3 of the Draft SEIS. Membranes were considered, and NYCDEP agrees that membrane technology has advanced a great deal in the past few years. Membranes do remove pathogens. A review of this technology confirmed that membrane technology cannot easily removed dissolved organic carbon to the level required without reverse osmosis, an additional step that would add cost, size, complexity, and impacts. Further, membrane technology has never been scaled up to the size of the Croton WTP.	3.3.
192.	507, 811	Sufficient pilot testing has not been performed. Warner WTP tests suggest that cheaper chlorine could do what UV is being built to do. The ESSP itself suggested that more tests were needed.	More pilot testing has been done. Disinfection alone, of any type, would not remove the solids that lead to turbidity.	2.3.6.
193.	125	Within 5-10 years the plant will start to degrade, and then will be susceptible to failure and/or terrorist attack.	The plant is designed for a service life of 40 years. However, with proper maintenance, the plant would in actuality last significantly longer	3.3.
194.	267, 268, 269	The SEIS indicates that Eastview is the best site due to the proximity of the water interconnections and the lack of environmental damage.	As stated before, each of the sites has its advantages and disadvantages. Among Eastview's advantages are that it would be easier at which to build from a logistical point of view. The nearby presence of the Catskill and Delaware Aqueducts is an advantage, but this site is the farthest site from the NCA.	1.5.
195.	285	Despite the NYCDEP's contention that the Eastview Site is impractical from an engineering point of view due to aqueduct availability, the executive summary states to the contrary that the Delaware Aqueduct can be used from the time that the WTP plant is finished at EV until the KCT is complete.	The Draft SEIS does not state that the Eastview Site is impractical.	1.5.
196.	288, 289, 290, 534, 609, 902, 903, 927	Construction at the Mosholu Site is not technically feasible due to groundwater infiltration into the excavation. Building at Eastview (at ground level) would not have this problem. Any water proofing would require constant maintenance and ultimately might fail. This is not the case at the Eastview Site. In addition, the groundwater recharge rate may have been seriously under estimated. The actual flow rate may be up to twenty times more than that presented.	Groundwater infiltration in an excavation is a common issue on construction sites and one that is easily managed. Generally, the water is pumped out. A slurry wall is often installed to permanently keep water out.	6.15.3.1.2.

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197.	722, 954	Back-up power has not been included in the design. If the power went out the water supply would be cut. Plan is needed for supplying power at the three potential sites. DSEIS allows for two x 1.5 MWA emergency diesel generators. 24 generators are needed to maintain maximum flow capacity in an emergency. Why the omission? NYSDOH document granting NYCDEP a waiver must be included. The use of fuel cells and their use for the UV component should be an established part of the design.	The Croton supply is not the primary source of water for NYC. It supplies 10% of the water on average and up to 30% during droughts or planned maintenance on the other facilities. A temporary shutdown of the Croton system due to a power failure is not considered a critical emergency problem and it is not necessary to have 100% back-up.	5.1.2.5.4. & 6.1.2.3.4. & 7.1.2.5.4.
198.	329	Large and complex projects are more likely to fail and have cost overruns. This type of work at Mosholu has not been done before.	Large engineering and construction projects are performed constantly all over the world. This type of work, while on a large scale, is not unprecedented. NYCDEP shall retain design and engineering consultants to perform the work after scrupulous review of their proposals	
199.	725, 880	How can NYCDEP contemplate a bypass that feeds unfiltered water to consumers in an emergency? The “boil water” alert response is inadequate as there is no discussion of potential contaminants, future water quality, etc.	This is an emergency bypass only and would provide non-potable water for fire protection and essential surfaces. It would be used only in the event of a failure of the WTP at the same time that the Catskill and Delaware systems were rendered unavailable.	3.5.1.
200.	360, 392	Westchester is vulnerable to Catskill/Delaware disruption. They currently use 95 mgd of Croton which is projected to rise to 130 mgd by 2045. That water needs to be filtered, too. The plant therefore should be built in Eastview.	There are currently no plans to filter the Catskill/Delaware system.	
201.	362	Building at Eastview with the KCT would ensure that all New York City residents have the same quality water delivered at the same pressure.	This is true and is one of the advantageous of this site. Each of the sites has advantages and disadvantages. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	1.5.
202.	363, 931	A Croton WTP at Eastview would extend filtration avoidance for Catskill/Delaware as filtered Croton water could be blended with Catskill/Delaware.	There are currently no plans to filter the Catskill/Delaware System. Blending the Croton water with the much larger volume of the Catskill /Delaware System would not affect the overall water quality very much and would probably not make a case for filtration avoidance, if that were considered necessary.	
203.	380	Site preparation for Eastview is 0 months versus 2 years for Mosholu. Soil and rock to be removed from Eastview is negligible whereas Mosholu its 1.25 mil cubic yards. Eastview is the better site in which to build.	The excavation at Mosholu would be much greater than that at Eastview. However, Eastview would require the excavation and construction of a large pump station 200 feet below ground and the removal of 577,000 cubic yards of overburden. Each of the sites has advantages and disadvantages. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	1.5.

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204.	662, 663	<p>Disadvantages to Eastview:</p> <ul style="list-style-type: none"> • Concentrates large number of water infrastructure projects on one site – vulnerability to terrorism and/or natural disaster. • Long distance from EV to City’s distribution would require repeated doses of chlorine <p>Recommend for Eastview:</p> <ul style="list-style-type: none"> • Final SEIS to incorporate specific measures that minimize risk from terrorism/natural disaster. • Develop specific strategy to insure that disinfection byproduct levels do not increase at tap. 	<p>NYCDEP is taking the security concerns under advisement.</p> <p>Boosting the disinfectants may be required, but that is true now, as the water in the New Croton Aqueduct is utilized upstate and must remain potable along its entire length. Filtration would reduce the organic content of the water; this would greatly reduce the health risk of disinfection byproducts.</p> <p>Flocculation and the subsequent filtration of organic material in the water treatment plant would largely eliminate the disinfection byproducts at the tap.</p>	3.3.
205.	665	<p>The Harlem River Site involves construction of a plant in a low-lying coastal area that is vulnerable to water intrusion. Sea levels are predicted to rise over the next 50-100 years. It is recommended that further analysis of potential ground water intrusion at the Eastview and Mosholu Golf Course sites is conducted and details provided how construction would address current/future groundwater issues at both sites.</p>	<p>The WTP main level would be 13 feet above mean sea level and protected by a higher sea wall. The tunnels and tanks below this level would be protected against groundwater and flood water. Engineering design considers the potential intrusion of groundwater to the sections of the buildings below the water table. The impact of the drainage of the groundwater around the sites was evaluated in the Draft SEIS. The drawdown at the Eastview Site was determined to be very localized and minor, and determined to be not significant. The drawdown at the Mosholu Site was considered to potentially threaten the water level at a nearby forested wetland, and the site plans include an infiltration trench and gallery design that would prevent the drawdown of groundwater to extend to the wetland.</p>	6.1.2.3.4. & 7.1.2.5.4.
206.	755	<p>Provide information about finished and/or raw water used to cool the proposed plant. What happens to the water? The 1999 final plan said that it couldn’t guarantee that there would not be cross-contamination between raw water and coolant despite pressure in coolant pipes being higher pressure than the water’s.</p>	<p>A large amount of water will flow through the WTP when it is in operation. Rather than use air to absorb heat from pumps, electric equipment, and other heat generating uses, the water in the plant would absorb this heat. This cooling water would not come in direct contact with any equipment but the heat would pass into the water through pipes. The warmed water would pass to the start of the WTP where it would be mixed with thousands of equal volumes of raw water so the heat rise in the incoming water would be negligible.</p>	3.3.
207.	801	<p>Building the WTP in Eastview would provide a readily addressable solution to the expansion of filtration facilities for any future Catskill/Delaware filtration needs.</p>	<p>Because of the differing water quality problems of the raw water supplies, the Croton WTP could not easily share many facilities with the Catskill and Delaware systems.</p>	

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208.	821	<p>There is an expectation that technology and advancements exist to create better design options. The proposal here appears too complicated with many unnecessary processes (Draft SEIS ENGALT, page 7, Table 3-5. Water Treatment Design Criteria). The NYCDEP Office of Environmental Planning and Assessment should recommend and NYC Office of Management and Budget should convene a Value Engineering Review to assure taxpayers that the Water Treatment Plant proposal meets the agency’s requirements to filter and supply clean water. A Value Engineering Review (VE) on the effectiveness of using UV instead of conventional filtration for the Croton should be requested.</p>	<p>A Value Engineering review was conducted. Design modifications were incorporated into the project description presented in the Draft SEIS. UV treatment is incorporated into this design</p>	3.3.
209.	822	<p>Tables 5.1.2, 6.1.2 and 7.1-2: Proposed Plant Statistics are not easily comparable. Provide a clear explanation of the dimensions of the Main Treatment Plant building footprint. Does this mean the building footprint on the ground or the total square footage of the building? Mosholu Site footprint is 380,000 sq. ft., what is the building elevation? The Eastview main building plant footprint is 262,000 sq. ft. and the Harlem River 272,000 sq. ft. Each of the latter footprints state the roof elevation is 65 feet. Are these buildings 2 stories? If so, then the total square footage of these buildings is 144,000 sq. ft. large than the Mosholu building. What is the necessity for the extra space? Please provide a comparison of the total square footage of the main building and “other buildings” at all three sites and explain the total square footage differences. In addition, please supply all the tables in a format that presents the same information and highlight the differences. e.g. why the necessity for an additional 100,000 square feet of space at the Mosholu Site?</p>	<p>The tables will be modified in the Final SEIS to make them more comparable. The reason why the footprint at the Mosholu Site is bigger than the other alternatives is that an access roadway that encircles the plant processes is incorporated into the underground structure. This function is achieved by an encircling roadway in the other designs that is not included in the plant footprints.</p>	5.1.2. & 6.1.2. & 7.1.2.

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210.	833	<p>NYCDEP changed the location for the KCT from Kensico Reservoir Shaft 18 to the Eastview Site off the Sprain Brook Parkway. It is impossible to adequately determine the reasons for this change, because the response to the request for the documentation was rejected. Could it be the NYCDEP wanted an excuse for “not putting all their eggs in one basket”? This ridiculous excuse assumes NYC would be able to exist with 10% of its water. The answer to that excuse is to build in a more secure location. Perhaps, if the location for the Croton Plant is changed to Eastview, and the techniques and methods of filtration are changed, then there is the potential to save a billion dollars and speed up the building of the Westchester section of the Third Water Tunnel.</p> <p>Why is it that the agency states it is an advantage on the one hand, and a disadvantage on the other? The KCT is listed in the Ten Year Capital Plan for \$1.7 billion. It was hailed by the Mayor just last year as the greatest thing since apple pie. If the NYCDEP wants to build it, they can find a way. If the NYCDEP wants to meet a Consent Decree, they can do it.</p>	<p>The planning for this tunnel dates back thirty years, and one of the proposed alignments always went through the Eastview Site. When the City determined that the best place to build the Catskill Delaware Ultraviolet Facility was at the Eastview Site that decision favored an alignment of the KCT through Eastview. The Croton siting decision is not connected to the alignment decision for the KCT, but it is under consideration that the availability of this new tunnel could save the costs of lining the New Croton Aqueduct for the Croton supply. The money in the 10-year plan only covers a portion of the cost of the KCT, as this project’s construction would extend beyond ten years.</p>	8.3.1.
211.	863	<p>The Final Scope of Work states that ancillary facilities are most logically located at the WTP site. At the Mosholu Site, ancillary facilities could be located close by in the neighborhood/public corridor and outside the park.</p>	<p>NYCDEP did evaluate moving the facilities off site. This led to the plan to pump residuals off site and to perform some of the laboratory functions at other NYCDEP facilities. The chemical unloading facility was determined to be best done near the storage tanks on City property to insure security and public safety.</p>	3.4. & 3.5. & 3.6.
212.	867	<p>The Final Scope of Work states that the NYCDEP and NYDPR plan for construction/restoration and management of golf course facilities will be described in the Draft SEIS. Plans described in DSEIS are incomplete and inadequate.</p>	<p>The NYCDPR and the concessionaire are still designing their new facilities. The plans as available at the time were briefly described in Section 6.2.3.1.1. This section just states that the existing clubhouse would be replaced with a new facility and that the current plan is to convert the golf course to an 18-hole “Executive” (short hole) course, but that these plans are subject to review and approval by NYCDPR. The Final SEIS will include updates to these plans as they are available.</p>	6.2.3.1.1.
213.	874	<p>Why does the NCA need to be pressurized if the WTP is sited at Eastview?</p>	<p>The NYSDOH has mandated pressurization of the treated water conveyance in order to insure that infiltration of groundwater into treated water would not occur.</p>	3.4.1.2.
214.	875	<p>A smaller footprint is an advantage for the Eastview Site. It now allows the design of two water treatment plants on the same site Then on the following page, it is a disadvantage due to security concerns.</p>	<p>These statements are true. The smaller footprints of both the Croton and the Catskill Delaware facilities made it possible to design both facilities on the Eastview Site. However, concentrating facilities alters the security conditions.</p>	1.5.

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215.	881	Part of proposed project is a potassium permanganate facility which will be constructed within GH5. This facility should not be part of the cost of the CWTP. This will be done in 2004 before the start of the CWTP.	This facility is a future plan only, and if it is determined that it needs to be built it would be after construction of the WTP.	3.3.
216.	886	Clarify and provide documentation that preservation of the water quality at Jerome Park Reservoir could become problematic should it be taken off line as part of the Eastview alternative.	The raw water source for both Central Park Reservoir and Jerome Park Reservoir is the same—the New Croton Aqueduct. High flow rates and chlorination maintain good clarity and quality in Jerome Park Reservoir, but the same water, allowed to stagnate in Central Park Reservoir, turns green with algae and has caused odor problems. If Jerome Park Reservoir would be taken off line the water quality would similarly deteriorate and would require treatment or wasting of large volumes of water to keep it fresh.	
<i>Natural Resources</i>				
217.	36, 263, 327, 421	300 mature trees will be destroyed at Mosholu. It took NYCDEP 30 years to fully restore the area in Van Cortlandt Park disrupted by Tunnel 3 construction.	The NYCDPR is developing a mitigation and restoration plan. If the Mosholu Site is selected, NYCDPR will conduct the restoration with funding committed by NYCDEP.	9.2.4.1
218.	102, 120	Fish thrive in rivers of the Croton watershed because the water is high quality.	Noted, but human drinking water standards exceed those required for the successful growth of fish.	2.2
219.	537, 538	Wildlife residing at the parks and Jerome Park Reservoir will be disturbed by construction.	The impact to natural resources for all sites was evaluated in the Draft SEIS. There is no high quality wildlife habitat in the parks areas that would be impacted by construction at Van Cortlandt Park or around Jerome Park Reservoir. Wildlife in the forests near the construction area are currently exposed to high noise levels from the urban surroundings and are already acclimated to urban conditions. The proposed construction would not substantially increase noise or dust levels in these wildlife areas.	6.14.3.2
220.	539	The environment at Eastview will be affected less than at Mosholu. The WTP should be built there.	The impact to natural resources for all sites was described in the Draft SEIS. The natural resource impacts were greater at the Eastview Site; more trees would be cut and impacts to wetlands are greater. Each of the sites has advantages and disadvantages. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	1.5.2. & 5.14.3. & 6.14.3.
221.	666.	The impact of construction on the Harlem River itself and the associated marine life needs analysis. Fully discuss the impacts that construction would have on the Harlem River and its ecosystem.	The first phase of construction would include the construction of a sea wall that would protect the offshore environment. The potential impacts at the Harlem River Site were addressed in Section 7.14.3 of the Draft SEIS. Sampling offshore showed a very simple community that is adapted to high sediment loading. The Draft SEIS predicted that the construction work would not adversely impact this community.	7.14.3.

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222.	771, 961, 962, 963	Van Cortlandt Park is of great importance to local residents. Building there would mean closing the park and cutting down hundreds of trees. This is not fair to the people of the Bronx. The park vegetation will be devastated by the louvers blowing out chemicals and the heat from the plant.	The existing Driving Range would be closed during construction, but it would be temporarily replaced on the existing golf course. The golf course and other park facilities would remain open during construction. Most of the tree loss would be confined to the existing driving range. The louvers are part of the heating ventilations and air conditioning system and will be used to circulate air that workers in the plant breathe. The louvers will not discharge any chemicals or significant heat that would affect the local environment.	6.14.3. & 6.13.3.1.
223.	838	Refer to Section 6. Project Impacts, Section 6.14.3.1.1 Trees and Vegetation, of the Draft SEIS. This section describes the cutting and/or removal of 16 white pine “trees of this nature and associated vegetation in a preserved park environment are rare in New York City....their loss would represent a potentially significant adverse impact...” It further states that these trees cannot be replaced and their value cannot be regained. These trees are being removed to widen the 233rd Street exit of the Major Deegan Expressway at the south side. Why not widen the exit northward and remove the gas station (another inappropriate use in a park). The gas station would not need to be replaced in the park. If removing irreplaceable trees can be avoided by widening at the north side, then do not remove the trees. The excuse that the northward area has not been alienated is unacceptable; the agency should have waited for the completion of the EIS to determine what lands are needed.	The quoted comment about “trees of this nature and associated vegetation in a preserved park environment are rare in New York City” refers to the large trees on the golf course. The trees that would be removed for the traffic improvements are small and replaceable in-kind. An alternative location would require an entirely new exit ramp from the Major Deegan Expressway, which is not needed and would have much greater environmental impacts than the widening of the existing ramp.	6.14.3.1.1.
224.	783	No study or even a statement of potential impact on birds or bird-supporting habitat in Van Cortlandt Park was provided. VC Park is an “Important Bird Area” in NYS. SEIS must study the effects on breeding birds and insure no nests are destroyed. Failure to do so could lead to serious future legal challenges.	Section 6.14.3.1.5 discusses the potential impact to birds. The habitat that would be disturbed by the proposed action is not high quality bird habitat.	6.14.3.1.5.
225.	784	How the \$200 million in park improvements are spent is an impact of this project. (1) The use of the funds cannot cause adverse impacts on birds or wildlife unless evaluated in the SEIS. (2) Mitigation plans can not degrade natural areas, and funds be allocated to restore and acquire natural areas.	The \$200 million in amenities would be utilized with the intention of improving Parks. The specific projects would be described in a Memorandum of Understanding that would be completed before the Alienation of parkland would take effect. These projects would not result in additional losses of parkland. These projects might require separate environmental reviews if they could potentially result in significant adverse impacts.	6.2.3.1. & 6.5.3.1. & Executive Summary
226.	785	The City could acquire Chapel Farm in Riverdale and South Brother Island, and restore Seton Falls Park, Bronx Park, Palmer Inlet, Pugsley Creek, Soundview Park, Turtle Cove, and North Brother Island.	These and other projects would be reviewed as potential projects for the use of amenities funding by NYCDPR and NYCDEP.	Added to Executive Summary

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227.	921	The DSEIS includes 9 pages discussing trees that will be cut down at Eastview, whereas for Mosholu the study merely says that NYCDEP will work with the Parks Department to replant trees. The degraded soil on top of the plant will not be able to sustain trees.	The Town of Mount Pleasant has a detailed Tree Protection Plan that stipulates how a developer should compensate for tree losses. The tree replacement and mitigation for Van Cortlandt Park would be conducted by NYCDPR with funding supplied by NYCDEP. The details of the NYCDPR plan for the replacement of the trees are not available. The commenter is correct, the thin soils on top of the WTP would not support trees, but since this would be a golf driving range it is not NYCDPR's interest to have trees replaced over the WTP footprint.	5.14.3.1.1. & 6.14.3.1.1.
228.	869	The Final Scope of Work says the potential impact to migrating birds at Mosholu will be discussed in Draft SEIS. The issue at question had to do with the disruption of migratory bird patterns due to the noise, decreased air quality and disruption. The Draft SEIS only addressed tree loss and impacts on forested areas.	Section 6.14.3.1.5 of the Draft SEIS discusses the potential impact to birds. The construction area is an open driving range with isolated rows of trees that is not good bird habitat. The entire Park is surrounded by urban noise, so all the wildlife is already habituated to urban noise. The interior forest areas of Van Cortlandt Park that would be frequented by migratory birds would not be impacted by the project.	6.14.3.1.5.
229.	885	Provide further information regarding unmitigatable adverse impacts on natural resources if water is discharged from Shaft 9 flow into Pocantico River (disadvantage of Eastview Site).	The text describes how the extent of flooding and the flow rates of the Pocantico River could increase if the Shaft No. 9 blowoff would be used. This would occur during an unscheduled plant shutdown, for example, during a power failure. Water would flow back down the raw water tunnel and surcharge the aqueduct. The blow-off at Shaft No. 9 was built to relieve such pressures but it has rarely ever been used because the current operating regime allows for open channel flow to Jerome Park Reservoir. The design team considered trying to store these unanticipated flows prior to release but the impacts of constructing a large storage tank at this site would be significant. Another alternative that was considered included the pressurization of the aqueduct back to the Croton Lake Gate House, so that surges from plant shutdowns would flow back to the New Croton Reservoir. This alternative would entail significant impacts and cost on the order of \$100 million and was not considered feasible. Thus it was concluded that if the WTP were built at the Eastview Site and the New Croton Aqueduct were chosen as the preferred means of conveyance there would be potentially be a significant adverse impact to the Pocantico River watershed.	8.1.2.3.1.
230.	944	The Final SEIS should protect from destruction the 16 rare white pine trees either by widening the 233 rd Street exit at the Deegan to the north rather than the south, or by other design changes.	The statement in the Draft SEIS was discussing the forest and preserved nature of the trees within Van Cortlandt Park and how that environment is rare, it was not discussing the rarity of the white pines, which are not locally rare. However, the anticipated removal of these pines was included in the calculation of the mitigation plan proposed for this project.	6.14.3.1.1.

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231.	641	Section 10.1.2 states the 8.7 acre footprint of the WTP...does not represent a change from the existing condition, so it was not considered a potential loss of open space. Explain why construction of the plant in the park does not represent a change when it will affect security, water table, topography, vegetation/natural resources for the foreseeable future.	This section referred to the existing use of the footprint of the WTP as a driving range for the golf course. The public is currently restricted from this area, and this same restriction would apply if the WTP were built at the Mosholu Site. The loss of trees and other vegetation would be mitigated by the plan developed and approved by NYCDPR. The site plans include control measures that would maintain the existing hydrology.	6.5.3.2. & 6.14.3.1.1. & 6.15.3.
232.	642	The DSEIS implies that there would be a greater negative impact at Eastview than at Mosholu.	This was not intended. The DSEIS listed advantages and disadvantages of each site alternative but did not compare sites, weigh the relative merits of sites, or draw conclusions about a preferred site.	1.5.2.
233.	643	What is NYCDEP's purpose for maintaining the Eastview Site?	The Eastview Site was purchased and is intended for the construction and operation of water treatment facilities. In addition to its potential use as a site for the Croton WTP, plans are currently underway for its development for the treatment and conveyance of Catskill /Delaware water.	1.5.1.
234.	644	Does NYCDEP conclude that construction of the WTP or other major construction at the Eastview Site would result in "unavoidable and immitigable significant impacts?"	The Draft SEIS concluded that the construction of the Croton WTP and the Catskill/Delaware Disinfection Facility at the same site at the same time could result in significant environmental impacts that could not be mitigated.	10.1.1.
235.	645	Has there been any legal or formal initiative within Westchester County to rezone the site from its current allowed uses to protect forested wetland?	No. The forested wetland is already protected by local and federal regulations.	5.15.2.1.
236.	646	Provide detailed information on investments already made by NYC in Eastview, including: date of purchase; purchase cost and statements provided at time of purchase and at later times; annual maintenance costs.	Some of this information is available in Section 5.7.2.1 of the Draft SEIS. For fiscal year (FY) 2003, the 87-acre City-owned parcel generated total property tax payments of \$273,261 including \$145,550 for the County general taxes (comprised of Town of Mount Pleasant tax, general County tax, and County sewer and solid waste districts), and \$127,711 for the Pocantico Hills School District 2002 - 2003 academic year. ¹ A more detailed history of the site's legal history is outside the scope of the SEIS.	5.7.2.1. & 5.1.1.
Water Resources				
237.	905	The Harlem River alternative requires filling in of 1.5 acres of tidal wetlands regulated under Article 25 of the environmental Conservation Law. This activity is classified as incompatible under state tidal wetland land use regulations (6 NYCRR, Section 661.5), and normally impermissible if alternatives exist, even for an activity that satisfies a compelling public need.	This is a serious issue with the Harlem River Site. However, the site is still viable because all the sites have potentially adverse impacts. If the analysis indicates that this site could meet project goals with the least impacts it could be selected.	1.5.2.5. & 10.1.3.

¹ NYCDEP. 2003. Real Property Taxes Report for the Eastview Site and NCA Shafts Nos. 9, 14, and 18. Prepared by the Office of Water Supply Lands. September 12, 2003.

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238.	823	The 1999 FEIS states that during construction of the WTP at Mosholu, the water collected in the excavated areas would be pumped to the combined sewer on Jerome Avenue. There is no mention of this in the SDEDES, therefore the assumption is that this statement holds true. A SPDES permit is required for this type of discharge. Where is the documentation from the NYC DEC that this will be permitted?	The 1999 FEIS and the 2003 Draft SEIS both describe an infiltration gallery and trench that would infiltrate some of the stormwater back to groundwater in order to avoid impacts to the hydrology that controls the water level in a nearby wetland. The list of permits does indicate the need for a SPDES permit for discharges during construction. This list has been amended to include a federal infiltration permit and state SPDES review A Draft Stormwater Pollution Prevention Plan (SWPPP) prepared in accordance with SPDES will be attached to the Final SEIS as an appendix.	6.15.3.2.1 & 6.15.32.2. & 6.20.
239.	835	For the Mosholu Site, refer to Section 6.15.2.1.2: Stormwater Runoff. Drainage basins #3, 4, 5,6,8,9 &10 are off-site of the project construction area. Phase II Stormwater Regulations (MS4) and NYC Local Law 103 of 1989 (On-site disposal pursuant to P110.13,) requires that storm water and runoff from a project site be managed on-site. Unless the NYCDEP can describe a hardship, all stormwater and runoff must be managed through drainage basins 1 and 7.	The “drainage basins” referred to in the comment are sub-catchments used in the stormwater model to predict the direction and volumes of storm flows. The stormwater will be managed on site to the extent possible. As is the practice throughout the City, rooftop and roadway drainage will be conveyed to the combined sewer. A City permit is required to utilize the storm drain system.	6.20.
240.	836	For both the construction and operation phase of the project, the stormwater catch basin drains to the Hunts Point Waste Water Treatment Plant. Despite what the NYCDEP states in the DSEIS, the maps are online. The Jerome Avenue catch basins drain to the South Bronx WPCP, and not Wards Island. Moreover, LL103 clearly states the drainage needs to be in the same sewer basin.	The online maps show Van Cortlandt Park draining toward Hunts Point, but the access road to the golf course and the sanitary drains from the golf clubhouse drain via existing sewer lines to Jerome Avenue, and from there to Wards Island.	6.16.2.1.4.
241.	837	It is unfair to dump the waste of the upstate watershed in the South Bronx at the Hunts Point WPCP.	The small amount of WTP residuals can be accommodated at the Hunts Point WPCP without any new construction or staffing.	
242.	900	Where is the written detail of the stormwater management plan at Mosholu?	This plan will be available for the preferred site prior to any construction. Stormwater Pollution Prevention Plans for all three alternative sites will be included in the Final SEIS as appendices.	6.16.3.1.4.
243.	901	Describe how the public will be assured that the stormwater management plan for the forested wetland will be followed as part of mitigations at Mosholu. Describe the method and frequency of monitoring reports to the public.	The monitoring plan was developed in 1999 and referenced in the City Council Resolution that was a condition to the ULURP approval of the Mosholu Site. Monitoring is to proceed for two years prior to construction, during construction, and for three years after construction. Annual reports are to be issued. Reports were sent to NYCDPR in 2000 and 2001.	9.2.4.1.

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244.	936	Impacts to the County bus garage's detention pond should be evaluated.	The potential for groundwater drawdown was considered, and there would be no impact to the water table at the bus garage. There would be no overland connection for water flows.	5.15.3.1.1.
245.	939	Westchester County now follows the NYSDEC Standards and Specifications for Erosion and Sedimentation Control. All construction activities must comply with these specifications.	The project plans comply with the State standards.	5.20. & 5.15.3.1.1.
246.	945	The Final SEIS should commit to protect and restore on-site wetlands.	NYCDEP has previously committed to protecting and restoring, if required, wetlands on-site as well as adjacent to the construction area as part of the Draft SEIS. This commitment will be carried forward into the Final SEIS.	5.15.3.1.3.
247.	946	The Final SEIS should commit to developing and implementing an on-site stormwater and groundwater management plan.	NYCDEP has previously committed to developing and implementing an on-site stormwater and groundwater management plan as part of the Draft SEIS. This commitment will be carried forward into the Final SEIS.	5.15.3.2.2.
<i>Infrastructure and Energy</i>				
248.	196	NYC already is susceptible to blackouts. The 35 MW required for running the plant at Eastview would come from Mount Vernon. This electricity would not be made available to NYC during a blackout.	Consolidated Edison does not report any problem meeting the electrical needs of the proposed WTP. The blackout of 2003 was not the result of a local shortfall in capacity.	5.16.3.1.1.
<i>Historic and Archaeological Resources</i>				
249.	152, 153, 154, 519, 598, 922	The Mosholu area is rich in history and artifacts from Native American and colonial inhabitants. There is 100% certainty that artifacts and remains will be found if excavation occurs at the Mosholu Golf Course. The New York City Landmarks Preservation Commission (NYCLPC) recommends an archaeological documentary study be performed at the Mosholu Site to clarify initial findings of old Native American settlements in the area. No digs will be performed despite it being known that eight Native American settlements once stood within 2 miles of the site. By contrast, digs will be performed at the Eastview Site.	The NYCLPC recommended that a documentary study be performed at Mosholu to clarify findings of previous Native American settlements in the area. This additional study shall be performed prior to any ground disturbance at the preferred site if the Mosholu or Eastview Sites are selected.	6.12.3.1.2.
250.	520, 923	Hammond House is being looked after, but the current clubhouse at Mosholu (which is >50 years old) is being demolished without the OPRHP being consulted.	The clubhouse is probably not eligible for listing. It has undergone extensive modifications to the exterior and interior and lacks architectural distinction. A definitive determination on this will be made prior to any action. Hammond House is a listed historic structure.	6.12.3.2.1.
251.	597	University Height Bridge is Landmarks designated and is listed on the State/National Registers.	Agreed. Any action at the Harlem River Site would preserve the historic character and context of this landmark structure.	7.12.3.1.1.

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252.	599	The NYCLPC recommends an archaeological documentary study be performed at the Harlem River Site to clarify initial findings of old Native American settlements in the area and to clarify next threshold of review.	The agencies are being contacted to determine if this is necessary. Additional documentation will be provided in the Final SEIS that indicates that the area of potential disturbance is not likely to contain Native American relics because of prior disturbance and because most of it was formerly under water. If the agencies feel that investigations are warranted they would be completed prior to any ground disturbance if the Harlem River Site is selected.	7.12.3.2.
253.	600	LPC recommends no further work over that which was previously performed at JPR.	Noted.	8.2.4.
254.	650	Written opinions should be provided from NYS Department of Parks, Recreation and Historic Preservation (NYCOPRHP), NYCLPC on the value, status, and impacts on structures in Van Cortlandt Park and Jerome Park Reservoir that will be altered or destroyed.	This request will be forwarded to NYSOPRHP and NYCLPC.	8.2.4.
255.	830	The Draft SIES review of impacts is interpreted incorrectly. Describe how it can be an impact to build near a historical site [at Eastview], but not an impact to tear down an “individual structure” [at Mosholu] that is potentially eligible for the State and National Register. Where is the letter requesting OPRHP to explain the significance of the site – and the Golf House? Where is the State Historic Preservation Act (SHPA) Determination? The NYS OPRHP has no request from the NYCDEP to determine that the proposed activity will have no impact (see July FOIL and response from OPRHP).	The Mosholu Golf Course Clubhouse was built in the 1930’s. The clubhouse and its setting would be described, and photographically recorded prior to any demolition. It is not listed or eligible for registration in the national list of historic places. The Hammond House dates to the Revolutionary War and it is currently listed in the National Registry. The NYS OPRHP has been sent the Draft SEIS and has not commented on the NYCDEP conclusion that the Mosholu Golf Course Clubhouse is not eligible for listing. If subsequent reviews by the agencies lead to a request for additional research it would be conducted prior to any demolition. All requirements of the National Historic Preservation Act have been, and will continue to be met by the project.	6.12.3.1.2.
256.	786	Additional Building Information forms need to be completed and submitted to NYSOPRHP for Mosholu and Harlem River. A formal opinion can not be entered by NYSOPRHP until these forms are submitted.	In response to this and other comments Phase 1A assessments have been filed with the NYSOPRHP and NYCLPC.	6.20. & 7.21.
257.	787	NYSOPRHP understands that an archaeological review shall be undertaken for the Eastview Site. It is NYSOPRHP’s opinion that Hammond House is the only structure that may be affected by the Croton WTP at Eastview. Changes to roads, existing buildings, and landscape should be kept to a minimum.	Impacts would be minimized to the extent possible.	5.12.3.1.1.
258.	790, 791, 793	Phase 1A Survey reports with supporting documentation must be completed in order for NYSOPRHP to comment on the potential for impacts to archaeological resources.	In response to this and other comments Phase 1A assessments have been filed with the NYSOPRHP and NYCLPC.	4.12.4.
259.	792	NYSOPRHP advises that it may be necessary to consult with Native American groups in order to obtain permits.	Consultations will be conducted as requested by other agencies.	4.12.4.

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260.	794	NYCLPC concurs that there is potential for recovery of Native American occupation remains at Harlem River. Borings are required to assess the site. Any work to identify, evaluate and mitigate must be reviewed by NYCLPC prior to implementation.	Additional information was provided in the Phase 1A assessments that were submitted in response to this comment. Boring information is available for only part of the site, as access to the whole site was not made available. Additional assessments would be made prior to construction, after access to the whole site is obtained.	7.12.3.2.2.
261.	795	NYCLPC requires exact location (provided on maps with coordinates) of Gate House No. 1 to assess potential impact.	This information was provided in the Phase 1A report.	8.1.5.3.2.
262.	788	NYSOPRHP asserts that lining the existing brick NCA with concrete would create an adverse impact.	Agreed, impacts to the NCA from the proposed lining of the tunnel will be described in the Final SEIS.	8.1.3.3.1. & 8.1.4.3.1. & 8.1.5.3.1.
263.	789	Any and all work to be performed on the NCA gatehouses and/or related contributing components must be reviewed by the NYSOPRHP, except for Jerome Park Reservoir which has a Programmatic Agreement for system improvements.	Agreed.	Table 8.1.2-30 & Table 8.1.3.21 & Table 8.1.4-19 & Table 8.1.5-9
264.	882	Jerome Pumping Station would be taken off line but retained for NYCDEP use. Literature should recognize that the facility is landmarked.	This is discussed in the full text of the Draft SEIS in the Historical and Archaeological Resources section.	8.2.2.1.1.
265.	782	There are fragile and irreplaceable historic resources along the Pocantico River downstream of NCA Shaft No. 9. In the event that the blow-off is activated, these resources would be damaged. The SEIS needs to assess the implications of this eventuality. The Historic Hudson Valley [agency] asks to be added to the list of involved agencies for circulation of notices under SEQR.	Section 8.1.2.3.1 discusses this potential impact. This section describes the changes in water levels that could happen in the event of an unplanned use of the blow-off under Water Resources. A cross-reference to this section will be made in a section on historic and archaeological resources in the Final SEIS, which will also describe the historic structures in the area. Table 8.1.2-22 in the Draft SEIS shows the elevation of historic and other important structures in the floodplain compared to the potential increase in water elevation resulting from a blow-off. No risk to structures would occur even in the worst case scenario of a blow-off occurring during a flood. Historic Hudson Valley is a not-for-profit [501(c)3] educational organization. It will be added to the list of citizens and organizations that receive notifications on this project and it is welcome to comment on the project.	8.1.2.3.1.

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<i>Air/Traffic/Noise</i>				
266.	39, 132, 133, 201, 203, 325, 395, 405, 410, 415, 424, 441, 547, 562, 569, 573, 585, 602, 776, 966	Increased traffic congestion, blocking of parking spaces, air and noise pollution will result from trucks and construction equipment/activities going to the Mosholu location. This may lead to an increased mortality rate from accidents and health effects. Air will be polluted for five years while the plant is built. The SEIS does not acknowledge that the truck traffic will make air quality and asthma rates worse.	The construction access to the Mosholu Site does not pass by any residences or business between the Major Deegan Expressway and the proposed site entrance. Asthma in the Bronx, received special consideration in the air quality and public health sections of the Draft SEIS. The State has promulgated tough air quality standards to avoid health impacts and NYCDEP has elected to use very conservative interim guidelines to assess the potential for air quality impacts related to potential increases in PM2.5. The analysis of the proposed construction was treated as if it was a permanent impact, and the projected emissions of particulates would still fall below the threshold at which health impacts would occur.	6.9.3. & 6.11.3. & 6.19.2.
267.	47	How can there be potential Air Quality problems at Eastview but not Mosholu when there is already serious non-attainment for Air Quality in the metro area.	The impact at the Eastview Site that was considered potentially significant would be only for the scenario where the Croton WTP and the Catskill / Delaware UV Disinfection facility would be built at the same time on the same site. The combined impacts of these two projects are more severe than either alone or the Croton WTP alone at the Mosholu Site.	6.11.3.2. & 5.11.3.2.2.
268.	96, 686	Nobody near any of the three sites wants the dust or trucks associated with construction and operation of the plant.	This is true.	
269.	154, 155, 518, 528, 606, 800, 920	The NYCDEP studied a mile radius for Eastview in a low density population area with 27 traffic intersections. For Mosholu, NYCDEP studied a half mile area in a high population density area with 9 intersections. Why study a third the number of intersections in the more densely populated area? The corner of Mosholu and Gun Hill (where two fatalities occurred last year) was excluded altogether. Impacts at Eastview would be much less.	Traffic study areas are not determined with a radius of study. Rather, traffic engineers make a determination as to what roads and intersections in the roadways near a project area will be traveled by construction traffic, and how that will affect the local traffic in the future. The intersections noted would not be used by the vast majority of construction related traffic (if at all). An advantage of Mosholu over the other two sites is its easy access to the Major Deegan Expressway. Construction traffic would exit the MDE at 233 rd , travel south on Jerome Ave (where there are no residences or buildings) and enter the site at the Mosholu Golf Course entrance. Harlem River also is close to the Major Deegan Expressway, but the intersection at 207 th street is heavily congested. Eastview is not located next to a major highway, and therefore construction traffic must travel a relatively long distance on local roads (and through more intersections).	5.9.2.1.1. & 6.9.2.1.1.

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270.	156, 157, 158, 238, 557	Dangerous intersections will be made even more deadly despite partial, false, and fantasy data. The radius of study was so small that it ignores the extremely dangerous intersections at Mosholu Parkway, Gun Hill Road, Dickenson Avenue, and Sedgwick Avenue. Accidents are virtually guaranteed when it rains and snows on Van Cortlandt Park South. These will be even more dangerous with large trucks carrying toxic chemicals.	Traffic study areas are not determined with a radius of study. Rather, traffic engineers make a determination as to what roads and intersections in the roadways near a project area will be traveled by construction traffic, and how that will affect the local traffic in the future. The intersections noted would not be used by the vast majority of operational or construction related traffic (if at all). An advantage of Mosholu over the other two sites is its easy access to the Major Deegan Expressway. Construction traffic would exit the Major Deegan Expressway at 233 rd , travel south on Jerome Ave (where there are no residences or buildings) and enter the site at the Mosholu Golf Course entrance.	6.9.2.1.1.
271.	159, 204, 554	What considerations have been made for ambulances from Montefiore and North Bronx Hospitals being blocked by slow moving construction trucks?	Construction vehicles, like all vehicular traffic, are required by law to yield to ambulances traveling to and from a medical emergency. Construction traffic generated by the proposed project at Mosholu will be no different from any other traffic in this regard.	6.4.3.2.5-7.
272.	162, 192, 525	The Draft SEIS says that it will present some new air model runs in the final. This is contrary to CEQR, which states you may not present substantial new information in the final draft.	The new air modeling is not substantial new information. It is updating air models to reflect design and engineering information that was revised or previously unavailable. In addition, an updated version of the model used to predict impacts from mobile sources is now available, and the modeling will use the latest available version.	4.11.2.
273.	185	The Draft SEIS states that there will be no adverse impacts from air on public health. However, the CEQR manual states that new vehicle patterns could adversely impact air. Also, the EPA and American Lung Association and OSHA have all stated that short term exposure to diesel fumes can cause irritation and inflammation of the lungs, which can exacerbate asthma. How has NYCDEP concluded differently?	Air quality was evaluated in the Draft SEIS for contaminants of concern known to potentially contribute to pollution and adverse health effects. The findings of all modeled air quality issues were presented in the Draft SEIS and presented again in the Final SEIS. If the updated analysis result in any changes in the conclusions these changes will be highlighted and taken into consideration prior to the site selection.	5.11.3. & 6.11.3. & 7.11.3.
274.	186	For 18 months at the Mosholu Site, 231 trucks/day will be arriving on site. Trucks will line up along Jerome Ave waiting to enter the site. They most likely will not adhere to the 3-5 minute idling rule.	If the Mosholu Site is selected, trucks would be required to adhere to the idling rules. A dedicated compliance officer would be on site to make sure that this happens.	6.11.4.
275.	201, 246, 258, 474, 546, 604, 605	Traffic currently using the 233 rd and Deegan exit will not continue to do so during construction. Drivers will look for alternative routes, adding to congestion in nearby streets. The worst affected routes will be Van Cortlandt Park South to Van Cortlandt Avenue West, Sedgwick, Dickenson, and Gun Hill Road. None of these intersections were analyzed. The diversion from a congested MDE to Woodlawn and Van Cortlandt Village should be analyzed.	If the Mosholu Site is selected, and prior to any excavation on the site, this intersection would be improved. An analysis of future construction traffic conditions presented in the Draft SEIS indicates that the addition of new turning lanes from the east and the west would actually improve existing conditions, even with the addition of the construction traffic. With an improved intersection there is no reason to think that existing drivers would be displaced.	6.9.3.2.1.

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276.	228	The NYCDEP assumes for its SEIS analyses that, for Mosholu, more pollution, noise, congestion, etc. won't matter as it's already polluted, but that those same incremental changes are unacceptable at Eastview.	The criteria for considering impacts are the same for all sites. However, noise impacts in particular are based on an incremental increase. Because the Mosholu Site has high background noise from the highways and elevated subway, the same increase in sound at the Mosholu Site is not as noticeable to the human ear as an equal increase at a more quiet location, such as near the Westchester Medical Center at the Eastview Site. This difference is based on human perception, not any acknowledgement that the existing conditions are more or less acceptable at the different sites.	5.9.3. & 6.9.3.
277.	231, 427, 868, 870	The SEIS states (in the Air Quality section) that there will be no blasting at the Mosholu Site. If blasting will occur, where are the impacts described?	There will be blasting at the Mosholu Site. The technical analyses in the Draft SEIS included blasting, but one sentence in the text of the air quality section erroneously stated that blasting would not occur.	6.10.3.2.4.
278.	514	The number of trucks at Eastview will be less than at Mosholu, but the Draft SEIS states there will be mitigations there but not at Mosholu.	Various factors contribute to whether construction traffic will warrant mitigation to a roadway. One factor, of course, is the number of vehicles, but of equal importance are proximity of a site to major highways and the existing level of congestion on local roadways. A very extensive traffic improvement program is designed for the Mosholu Site if it is selected. This design includes the construction of new turning lanes at 233 rd Street and Jerome Avenue and a new site entrance. Also included are signage and a Traffic Control Agent to prohibit construction truck traffic from entering or leaving the site from the south.	5.9.3.1.1.1. & 6.9.3.2.3.
279.	572	The effects of construction on commuters near Mosholu must be considered.	An analysis of future construction traffic, including its effect on local traffic and parking, was included in the Draft SEIS.	6.9.3.2.2.
280.	651	Include an official statement from the MTA on potential impact of repeated blasting at Mosholu Golf Course on the subway tracks and station.	The MTA provided detailed specifications related to blasting. The specifications are intended to insure protection of the elevated structure and are standard for blasting activity that takes place by NYCDEP and other entities City-wide. These specifications were incorporated into the Site Preparation specifications that are available to Contractors.	6.10.3.2.4.
281.	653	Mosholu raises the most significant quality of life issues. This community would experience the most pressing impacts.	The quality of life issues would be monitored during construction and would be stipulated in all the construction contracts. NYCDEP would work with communities to monitor any potential impacts to the community. The SEIS analysis indicates that the site that potentially has the worst air quality impacts from construction would be the Eastview Site, if the impacts from the proposed Croton WTP construction are combined with the impacts from overlapping construction on the Catskill Delaware Disinfection Facility. The Eastview Site has residential receptors (hospital, juvenile center, county penitentiary) as close as those around the Mosholu Site.	5.4.2.1. & 5.11.3.2.2. & 6.4.2.1. & 6.11.3.2.

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282.	654	<p>The Draft SEIS does not adequately analyze the potential impacts to air quality due to construction at the Mosholu Site. Most of the heavy equipment on site would be diesel-powered, there would be fugitive emissions from such a large-scale construction project, and up to 231 trucks entering and leaving the site. However, the document does not fully analyze impacts of PM2.5, nor does it adequately measure existing air quality conditions in an area characterized by numerous sensitive receptors and significant levels of particulate pollution. The Draft SEIS also does not provide enough detail as to measures that will be implemented to control these air emissions.</p>	<p>The potential for air quality impacts during construction was properly analyzed. The period during which the truck traffic at the Mosholu Site would exceed 150 trucks per day would be May, 2006 – June 2007. The induced truck traffic during the rest of the construction period would be much less. The project-induced increment was compared to the ambient conditions. The air quality study showed that even during the peak period health-based impact guidelines would not be exceeded. The air quality monitoring station at the Bronx Botanical Gardens is the closest station, and is representative of the study area in that it is surrounded by highways and urban sources. PM2.5 is considered a pollutant and is consistently analyzed throughout New York City for other projects in accordance with the same protocols used here. In the absence of EPA guidelines NYCDEP is following the State’s guidance and has added an additional impact criteria to reflect the regional nature of the average pollutant concentration over 1 square kilometer centered on the point of maximum impact. The State’s guidance is for 0.3 µg m³. The air quality study predicted that the future conditions with the project would be below this level. NYCDEP is aware of studies that show that PM2.5 is heavily influenced by very local sources. The air quality models used in the analysis reflect the behavior of particulate pollutants. The project-induced impacts were calculated and then added to the existing conditions and to the predicted future conditions. Short-term concentrations that exceed levels for particulates around construction sites are very common, particularly right at the fence line before the particles have had a chance to settle or disperse. These short-term impacts are not considered significant. The PM2.5 analysis is inherently very conservative. Secondary production of PM2.5 by trucks from tire wear and brakes was also included. Behavior of particulates was modeled without taking full credit for reductions that would occur from paving construction roads and other actions that are difficult to quantify but that serve to minimize impacts. Note too that the truck route to the Mosholu Site does not pass by any residences or heavily traveled pedestrian routes.</p>	6.11.3.

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283.	653, 655, 907, 941	<p>As required by SEQRA, the Final SEIS should include measures that minimize the environmental impacts to air quality at the Mosholu Site. The final SEIS should more specifically address impacts and mitigation of air at the Mosholu Site.</p> <p>Recommend as follows:</p> <ul style="list-style-type: none"> • As mitigation measure, all public agencies and their contractors to use low-sulfur fuel. • Best available technology for reducing emissions (like at WTC site). • A compliance officer to be assigned to site on permanent basis to enforce 3-minute idling rule. • A commitment should be made to establishing an air quality monitoring program in the community both prior to and during construction. • A commitment should be made to install air quality filters on all WTP equipment and that this air pollution equipment is kept in good working condition. 	<ul style="list-style-type: none"> • Ultra-low sulfur fuel will be mandated for all off-road diesel equipment greater than 50 HP. In addition, NYCDEP has committed to using Ultra Low Sulfur Diesel (ULSD) or best available technology that would reduce emissions of pollutants to equivalent levels as would be achieved with the use of ULSD in all public agency vehicles and trucks utilized during the hauling of excavated materials. Unfortunately, NYCDEP is unable to endorse implementing an air quality monitoring program. An effective monitoring program would be near impossible to accurately achieve given that air pollutant levels at areas surrounding the site are controlled by many variables, including wind velocity and wind direction that is further complicated by upwind and downwind sources. However, NYCDEP is committed to assigning, during construction, an air inspector to enforce City air quality provisions. • Aggressive management of dust from construction by wetting surfaces and cleaning trucks will be required. NYCDEP will be using natural gas boilers for heating the facility. These boilers would be high-efficiency and produce low emission levels, similar to the boilers utilized at schools and hospitals. In addition, to the boilers the facility would be equipped with two emergency diesel generators that would be sized to provide sufficient power to handle emergency safety needs, and not operate the facility. The generators would only be run in the event of a power-outage and for a few hours monthly for testing. 	9.3.
284.	656	<p>A major area of concern for quality of life at the Mosholu Site is from potential construction related traffic. Problems from traffic are extra delays due to trucks, safety for children crossing streets, parking (and displacing local employees and shoppers).</p>	<p>The majority of traffic to and from the site would be the arrival of workers. Truck traffic does add a disproportionate impact on traffic, but the analysis considered the special impact from trucks. This led to the decision to provide extra turning lanes onto Jerome Avenue from the Major Deegan Expressway, East 233rd Street, and into the site from the north. These measures should adequately address these concerns.</p>	6.9.3.2.1.

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285.	658	Elevated noise will severely limit park visitor's enjoyment of the park. The FSEIS should specifically commit to constructing highly absorbent noise barrier along the project's west side and discuss to what extent measures reduce noise at higher floors.	There would be temporary noise impacts at the closest receptor to the construction site, along a fairway of the golf course. This impact would not affect any users for an extended period, as this site is along a single fairway, only golfers would be affected, and only for the period they are playing through. Public users of the Park at the Shandler Recreation Area and the nearby Saturn Playground would be exposed to much lower levels of noise. These levels would be minimized to the maximum extent possible. The Contractor would be required to comply with the noise levels disclosed in the Draft SEIS, which are based on absorbent noise barriers as described in the comment. The Contractor could choose an alternate means of compliance, if one is available, but the performance standards in the contract specifications are disclosed in the Draft SEIS and assume that a highly efficient noise barrier would be put in place. This performance standard is based on elevated receptors along Jerome Avenue. The highest noise levels would occur during excavation. The walls of this excavation, once it gets below grade, provides an additional screen that would shield apartments above street level, so the peak levels would occur for a period of only several months, not several years.	6.10.3.2. & 6.10.3.1.

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286.	831, 892, 904	<p>The EPA, American Lung Association and the National Institute for Occupational Safety and Health (to mention only a few) all conclude that even short-term exposure to diesel fumes can cause irritation and inflammation of the lungs, worsening allergies contributing to asthma. Explain the inconsistencies with the NYCDEP position. The SDEIS states that for about 18 months a maximum of 231 20yd³ truck trips per day are anticipated for hauling 762,500 yd³ of overburden and debris from the site. 50 truck trips/day that could be interpreted as 50 times the existing emission of diesel exhaust. There is the potential for tens of diesel trucks lined up along Jerome Avenue waiting to enter the project site and be loaded. Describe in detail the mechanism by which the NYCDEP will assure the community that these vehicles will adhere to the 3-5 minute idle regulations.</p> <p>The NYCDEP states there are no adverse affects on air quality or public health. The DSEIS states that “No significant adverse affects were identified in air quality at the Mosholu Site and is therefore not considered.....”</p> <p>Explain why in comparing Tables 5.11-18 and 6.11-17: Modeling Results for all WTP PM_{2.5} Pollutant Sources indicate that both the Ambient AQ ug/m³ and the All Sources ug/m³ at the Mosholu Site are higher than those at the Eastview Site, and the Eastview numbers are considered an impact and the Mosholu numbers are not.</p> <p>The DSEIS states no significant impacts at the Mosholu Site, and yet CEQR says that actions that add vehicles to roads may cause an impact and that potential impacts from construction vehicles need to be considered in both duration and magnitude.</p>	<p>Impact thresholds are based on whether or not the project would exceed: 1) thresholds determined by the State and federal EPA, and 2) thresholds determined by the City and described in the CEQR Technical Manual. These thresholds are based on the best available human health risk assessments. NYCDEP does not dispute that diesel emissions and dust are irritants. The issue that the SEIS addresses is whether the incremental increase resulting from the proposed action represents a significant human health or environmental impact. Based on the thresholds used to assess impacts, the proposed project, which incorporate numerous plans to minimize emissions, would not by itself represent a significant risk to environmental or human health.</p> <p>The 3 minute idle rule is part of the Traffic Rules of the City of New York. It must be complied with by the Contractors or they will be subject to fines. This will be enforced by the Construction Manager, NYCDEP, and the NYC Police.</p> <p>The comment about comparing tables probably refers to Tables 5.11-18 and 6.11-18, both of which describe potential increases in particulates in the air from the proposed construction activity at the Eastview and Mosholu Sites. The particulates at the Mosholu Site are reported as higher than at the Eastview Site, but this is because the background is higher. The incremental increase would still be well below any threshold for impacts, and the total at both sites is less than the levels at which health based exceedences would occur. Since the Draft SEIS, NYCDEP is mandating the use of Ultra Low Sulfur Diesel Fuel for all the stationary construction equipment on the site. This will further lower the emissions. The new predicted values will be released in the Final SEIS. A full analysis was performed as required by CEQR. The results of this study were presented in the DSEIS and also will be presented in the FSEIS.</p>	5.11.3. & 6.11.3.
287.	872	<p>The Final Scope of Work states that a new traffic study will be included in the Draft SEIS. The new traffic study analysis is inadequate and the impacts are not adequately addressed or mitigated in the Draft SEIS.</p>	<p>All the traffic work was updated since the 1999 Draft EIS. Intersections were added and the road network was extended to include access to major highways. NYCDEP believes the analysis is adequate.</p>	4.9. & 5.9. & 6.9. & 7.9. & 8.

Item #	Comment Number	Comment	Response	Section Reference
288.	873	The Final Scope of Work (11/4/03) states a plan to control traffic will be described in the DSEIS.	This plan was in the 1999 Final EIS. Page 33, Section IV.3.7.4 of that document describes the measures that would be implemented at the Mosholu Site to keep most, if not all construction traffic to the north of the site between the site entrance and 233 rd Street. This description is as follows: “The site access roadway for vehicles traveling south on Jerome Avenue, would be located approximately 150 feet north of the intersection of Jerome Avenue and Bainbridge Avenue with the existing golf course access road, as shown in Figure PP.IV.3.7-7. The existing road to the golf course would temporarily be converted to an eastbound one-way roadway. The access road and the golf course road would merge into one two-way roadway west of the intersection. Figure PP.IV.3.7-7 shows that there would be a left-turn prohibition for all trucks seeking to enter the project site from the south or exit the project site to the south. This would cause the vast majority of trucks to use the Major Deegan Expressway at the 233 rd Street intersection, to access or exit the project site.” This plan will be updated and included in the Final SEIS.	6.9.3.2.
289.	893	Since the 1999 EIS, a new Children’s Hospital has been built, the First Tee program has begun at the Golf Course, and 2 new schools/public facilities have opened. Traffic patterns and volume have changed. Describe the new traffic impacts and proposed mitigation for 2004.	The Traffic and Transportation section has been updated with new baseline measurements taken in 2003 and is reported in its entirety in the Draft SEIS and Appendix H.	6.9.2.1.
290.	894	ALL construction truck traffic should be required to use the 233rd St. Major Deegan exit.	Blocking left turns into the site from the northbound lane of Jerome Avenue renders access from the south impractical. Additionally, traffic enforcement agents would be used to ensure adherence to traffic control measures.	6.9.3.2.
291.	895	Will the temporary new one-way entrance to Mosholu Golf Course be removed at the completion of the project?	The entrance would be retained after construction. The text will be clarified to explain that this is a temporary construction entrance, but a permanent site entrance.	6.9.3.2.

Item #	Comment Number	Comment	Response	Section Reference
292.	657, 896, 942	<p>Describe how one traffic control person can “police” both the exit and the new entrance. Will traffic control personnel be on site during the entire construction workday as vehicles will be entering and exiting all day long? Describe how one traffic control person will stop large construction vehicles attempting to make the turn not allowed. Utilize moveable barriers such as those at the entrance to City Hall should be utilized to prevent drivers from making the turns. The traffic mitigation suggested in the Draft SEIS for the Mosholu Site should be reinforced as follows:</p> <ul style="list-style-type: none"> • An unambiguous requirement that all truck traffic use the Deegan’s 233rd street access point and that they be prohibited from using local streets. • In order to reduce parking, a requirement that reduces the number of vehicles brought by construction workers; car-pooling, use of public transportation, and clean-fueled shuttle buses should be used. Provisions for accommodating needs of local residences and businesses. • Final SEIS should specify a program for installing cones, barriers, and signs to prevent illegal turns and to commit traffic enforcement personnel sufficient to insure that mitigations are adhered to. 	<p>All truck traffic during construction would be required to access the site from the north along Jerome Avenue and exit the site to the north along Jerome Avenue. A Traffic Enforcement Agent would be assigned to enforce the traffic restrictions. The parking lot within the Shandler Recreation Area as well as reserved parking locations for NYCDEP contractors on Jerome Avenue between West 233rd Street and Bainbridge Avenue would be utilized for worker parking. These accommodations should provide sufficient parking for both the construction workers as well as the public and no parking shortfalls are anticipated.</p> <p>NYCDEP will require that a Traffic Enforcement Agent be present during construction to enforce all applicable regulations and requirements. The traffic control plan included with the Draft SEIS as well as the Final SEIS includes signage and striping to make the proposed traffic patterns to be implemented as part of the project both obvious and enforceable.</p>	6.9.3.2.
293.	897	Describe how the 20’ high noise barriers around the excavation site will sufficiently block the noise from the upper floors of Amalgamated Houses, and other tall buildings such as Tracey Towers and Scott Tower	The distance to these elevated receptors is adequate to attenuate the sound from the work around Jerome Park Reservoir to acceptable levels. This planned work is of relatively small scale, short duration and largely below ground.	8.2.3.2.6. & 9.4.6.2.
294.	898	The Draft SEIS states that a “barrier of highly sound absorbent material....could be used...” What does this mean? Either the noise at this site will be mitigated or it won’t.	The contract specifications require the Contractor to meet specified sound levels (per the NYC Noise Code and CEQR) at the construction fence line. The Draft SEIS analyzed noise barriers as a means to achieve these levels to determine if mitigation is feasible. The Contractor could develop an alternative means of compliance that is acceptable.	9.1.4. & 9.2.3. & 9.4.6.2.
295.	899	Who will insure adequate and timely response to noise complaints arising from the dedicated complaint response system?	It will be NYCDEP’s responsibility to respond to complaints. The Construction Manager, either on its own or under the direction of NYCDEP, would have the authority to impose fines on the Contractor for not complying with all the “quality of life” issues that would be included in the contract. In addition, an independent Facilities Monitoring Committee would be created to provide a mechanism for community groups and the Borough President’s office to interact directly with the NYCDEP management.	6.10.3.2.4.

Item #	Comment Number	Comment	Response	Section Reference
296.	925	For the air quality analysis, DSEIS defined 2010 as the greatest construction year, yet 60% of excavation will occur in 2006. The 2006 impact is averaged together with three other years. This underestimates the true impact for 2006.	Peak years for the air quality analysis are based on both stationary (construction equipment) and mobile (truck) sources. The peak years would be different for each site, based on when the work would generate the most amounts of air emissions. The stationary peaks are based on emissions from equipment described in the engineering estimates. The peak years in the analysis were selected to show maximum impacts as follows: Eastview Mobile 2008 Stationary 2008 Mosholu Mobile 2010 Stationary 2010 Harlem River Mobile 2009 Stationary 2006	5.11. & 6.11. & 7.11.
297.	935	Potential impacts with bus traffic to and from the Bee Line bus garage opposite the Eastview Site were raised.	The traffic analysis indicates that the traffic can be accommodated on Walker Road with changes in signal timing that would allow more egress to and from Grasslands Road/100C from Walker Road.	5.9.3.1. & 5.9.3.2.
298.	937	Consideration should be given to relocating the entrance to the Police Station directly across from the bus entrance.	The Police Station is a separate project that is undergoing a separate environmental review and Site Plan Approval. This comment should be addressed during that project's review process.	5.9.2.2.
299.	938	Air quality mitigation measures should be explained more thoroughly for the Eastview Site.	Numerous actions that avoid air quality impacts are described in the Eastview Air Quality Sections 5.11.3.2 and 5.11.4. These measures are incorporated into the project planning, and are not separately described as mitigation measures, but they would serve to avoid impacts to the nearby sensitive receptors.	5.11.3.2. & 5.11.4.

Item #	Comment Number	Comment	Response	Section Reference
300.	943	<p>The Final SEIS should commit to the following noise mitigation measures at Mosholu. In order to ameliorate adverse impacts to park users, local residences, and businesses:</p> <ul style="list-style-type: none"> • Commit to constructing a noise barrier made of highly absorbent material that surrounds the entire site. The design should reduce noise at higher floors in locality, and should feature “windows” so that public can look in on the work site. • Commit to a noise monitoring program in the park and surrounding area and should address and mitigate unanticipated noise. • Construction hours should be limited to 7:00 am – 6:00 pm, with restricted activities on holidays and weekends. 	<ul style="list-style-type: none"> • As part of the proposed project noise levels experienced by the public during construction would be required to not exceed either 65 dBA or 3 dBA above the ambient, whichever is greater. In order to meet these requirements noise attenuation measures would be implemented. The instillation of “windows” in noise barriers significantly reduce the attenuation the barriers provide, therefore, no windows would be provided. • NYCDEP is committing to an Environmental Compliance Monitor who will be assigned to provide oversight and compliance monitoring so that all the environmental and quality of life commitments are met. • “Normal Project Working Hours” for the proposed construction would be from 7:00 AM to 6:00 PM. If construction is required beyond those hours, for such things as to complete a concrete pour, the contractor would be required to obtain prior approval from NYCDEP. However, it is anticipated that work beyond the “Normal Project Working Hours” would be infrequent and involve less than intrusive activities. 	9.2.3.
301.	949, 950	<p>The Final SEIS should commit to the following mitigation enforcement measures during construction:</p> <ul style="list-style-type: none"> • Commit to full-time NYCDOT traffic control and enforcement personnel empowered to assist with local traffic and to insure traffic mitigation measures are complied with. • Commit to assigning a NYCDEP air/noise inspector who would enforce NYC air and noise codes and mitigation measures. 	<ul style="list-style-type: none"> • A full-time Traffic Enforcement Agent will be stationed throughout the construction activity at the entrance to the Mosholu Site to ensure that all applicable regulations and traffic controls implemented as part of the project are enforced. • NYCDEP is committing to an Environmental Compliance Monitor who will be assigned to provide oversight and compliance monitoring so that all the environmental and quality of life commitments are met. 	6.9.3.2.
<i>Neighborhood Character</i>				
302.	17, 450	Residents in the Croton watershed appreciate the reservoir system and wish to maintain its beauty and character.	Noted.	1.2.1.

Item #	Comment Number	Comment	Response	Section Reference
303.	48, 279, 412, 459, 515, 772	The land use section is biased. The Draft SEIS states that the plant in Mosholu will not constitute an impact. For Eastview, it claims that the character will be changed. How can neighborhood character be a problem at Eastview but not at Mosholu?	This assessment refers to the neighborhood character after the plant is completed and operating. The finished plant at Mosholu would be underground and the land alienated during construction would be returned to park use (except for two acres that is currently and in the future obscured from public view by vegetation and the topography). The impact at the Eastview Site would only be significant during construction if the entire site is built out with the Croton WTP as well as combined construction impacts with other NYCDEP facilities at the site (e.g. the Cat/Del UV Facility). The plant at Eastview, unlike the one at Mosholu, would be above ground and would demonstrably alter the character of the area in combination with other facilities. Neighborhood character at Mosholu would be temporarily affected during construction	5.6.3.1.2. & 6.6.3.1.
304.	79	Eastview is a poor choice of location as it is near schools, a senior citizen's nutrition center, and a bus terminal.	Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	1.5.1. & 5.6.3.
305.	134	The project as currently planned will destroy Mosholu and destroy schools around Jerome Park Reservoir. The Draft SEIS shows that the worst and most expensive choice is to build in Van Cortlandt Park.	The construction work at the Mosholu Site would have temporary adverse impacts but would not "destroy" the neighborhood. The proposed construction around Jerome Park Reservoir is restricted to a small area for short duration, would be largely confined to work inside of existing structures or work below ground, and would not have a significant adverse impact. Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	1.5.1. & 6.6.3.2. & 8.2.3.2.1.
306.	135	The Croton WTP should not be built in a residential community such as Van Cortlandt. It should be built in Manhattan. NYCDEP should look at the facts it has uncovered (in the SEIS) and build where it makes sense and save the Mosholu community.	There is no site in Manhattan that would permit feasible connections to the distribution system for the Bronx. Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	1.5.1.
307.	138, 143, 167, 172, 197, 202, 206, 239, 243, 342, 463, 465, 529, 532, 550, 611, 629, 816	Despite the Draft SEIS conclusion to the contrary, construction will be a burden to the residential community around Mosholu and that burden must be alleviated or avoided all together. The area around Mosholu is one of the most congested in the nation, complete with medical facilities, park, residences, schools, and small businesses. There are roughly 25,000 students and 80,000 residents in the area. All of these will be adversely affected by placing the plant here.	The density of population and community facilities around each site was evaluated in the Draft SEIS. Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	6.6.2.1.
308.	216	The Harlem River is a ridiculous site due to its proximity to the VA hospital, Fordham Hill Coop, and the community college, and due to the heavy traffic on Fordham Road.	The density of population and community facilities around each site was evaluated in the Draft SEIS. Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	7.6.2.1.
309.	217	The district court previously stated that building is not allowed near sensitive areas (schools, hospitals).	NYCDEP is not able to verify the validity of this comment.	

Item #	Comment Number	Comment	Response	Section Reference
310.	271, 272	Eastview has a higher per capita income with no schools, libraries, and community centers within a ½ mile. Mosholu has all these receptors.	The density of population and community facilities around each site was evaluated in the Draft SEIS. Eastview has a hospital and residential facilities immediately adjacent to the site. Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	5.6.2.1. & 6.6.2.1.
311.	396, 400, 413, 414, 419, 422, 438	The construction, which will run for 8 years at 5-6 days/week, will undermine the stability, vitality, and efforts to revitalize the neighborhood	Construction impacts, because of the long construction period, were evaluated using the same impacts that would be used to consider permanent impacts. This will allow these potential impacts to be thoroughly compared prior to making a decision on the final site selection.	4.6.3.2.
312.	404, 428, 429, 431, 542, 570, 762	Construction at Mosholu is not defensible given the high density of residences, schools, pedestrians, and traffic already in the area. It will take away parkland from local residents.	There would be a loss of two acres of parkland at the Mosholu Golf Course if that site is selected, but no other change in park uses would occur. The mitigation and amenities package proposed for this site would compensate for the loss of parkland.	6.5.3.2. & 6.6.3.2.
313.	516	The Draft SEIS states that no impact will occur on neighborhood character at Mosholu because work is occurring in unzoned parkland. This ignores that future variances may be granted on the basis of the plant being allowed there. This will significantly impact the future neighborhood character.	Future actions would be evaluated on their own merits.	6.6.3.
314.	635	Clarify how the construction of a plant, which will require continuously staffed operations, deliveries of chemicals by trucks, and high security protection, does not permanently alter the use and potential use of this land.	The current land use of the Mosholu Site is a golf course and a driving range. If this site is selected the future uses remain the same. The arrivals and departures of a few trucks a day would not adversely affect the golf course. The security area would be screened from the public views and would not appear substantively different than the existing guard booth at the existing parking lot, which is currently surrounded by a tall chain link fence.	6.2.3.1-2
315.	160, 245, 472, 475, 768, 774	Special consideration must be given to those residences in the double impact zone, i.e. within ½ mile of both Jerome Park Reservoir and Mosholu Golf Course. The cumulative impact of construction at JPR and Mosholu is not considered. EIS ignores combined effects of JPR and Mosholu work and does a poor job of describing what is being done at the JPR and where.	The possibility of cumulative impacts was considered for JPR in conjunction with either one of the Bronx sites. The potential impacts of work around Jerome Park Reservoir are described in Section 8.2 of the Draft SEIS. This work would be of a much smaller scale than any work previously planned for this site. The potential for cumulative impacts was considered but construction traffic patterns for the two sites would not overlap. Traffic to the Mosholu Site would arrive from the north, whereas traffic to Jerome Park Reservoir, which is small to begin with, would go to the Major Deegan from the west. It was determined that the locations (JPR/Mosholu and JPR Harlem River Site) were far enough apart that there would not be substantial cumulative impacts to receptors due to construction activities.	8.2.3.
316.	781	The quality of life near Mosholu will be adversely affected by the loss of trees, disruption to the golf course.	The SEIS acknowledges that the project would result in the disruption of the golf course and loss of trees as a consequence of the proposed construction. This disruption is not seen as a significant impact to the neighborhood's quality of life.	6.6.3.1.

Item #	Comment Number	Comment	Response	Section Reference
317.	888	A discussion of advantages versus disadvantages should note that Mosholu is (1) the most densely populated; (2) has the most local pedestrian traffic; and (3) has the most number of schools and other public facilities	Number 1 and 2 are true and will be considered in the site selection. The public facilities around the Eastview Site actually exceed the density of public facilities around the Mosholu Site.	1.5.1. & 5.4.2.1. & 6.4.2.1. & 7.4.2.1.
318.	910	<p>Despite the Draft SEIS's contention to the contrary, Mosholu will not be returned to its current condition:</p> <ul style="list-style-type: none"> • 16' high x 300' long wall along Jerome Avenue that isn't there now. • The club house will be destroyed and put in a new location. • A few hundred trees will be destroyed and a significant piece of parkland will no longer have the soil depth to support trees. • The park will only be useable as a golf driving range, but nothing else. <p>Eastview is zoned for industrial use, which is appropriate for a WTP.</p>	The wall referred to in the comment is a temporary feature. It would replace an existing chain link fence. The club house would be replaced with a new structure designed to NYCDPR specifications. Trees would be removed from the WTP roof area, but replace elsewhere. It is true that future uses would be restricted over the WTP footprint. Zoning at Eastview is appropriate for a WT but it would still require a Town Board approval	6.3.3. & 6.6.3.
319.	832	The Eastview Project section on Neighborhood Character forgot to describe a major project currently under construction, the Consolidated Edison Substation. This \$100 million project on 2 acres of land between the residential area and the Eastview Site.	This new electrical substation is described on page 10 of Section 5.16, Infrastructure and Energy, of the Draft SEIS. The map in this section that shows the underground feeders to the proposed WTP show the feeders initiating at the site of the substation.	5.16.
Visual Character				
320.	839	Figures 6.3-8, 5.3-3 and 5.3.15 These photographs are not comparable. The existing conditions Mosholu Site photos should show the Golf House since the Eastview photos show Hammond House. The future without the plant photos should show the actual plant sites as they exist today. The Mosholu and Eastview photos should be comparable. The future with the project photos should show the driving range at Mosholu with simulated reconstruction as it might look with the WTP underground and the aboveground buildings, parking areas and new Golf House.	The visual character photos follow guidelines for making these assessments that include only views that are publicly accessible from off the site. Hammond House is right on Rt. 100C, so it is shown. The future rendering at this site shows the WTP in the distance, beyond the screen of trees that would not be cut down. The future at the Mosholu Golf Course Site shows an artists rendering of a new fence and the future driving range tee boxes. The above-ground WTP buildings would not be visible from Jerome Avenue.	5.3.3.1.1. & 6.3.3.1.

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Combined Effects				
321.	4, 38, 57, 60, 62, 63, 163, 164, 457, 523	Coinciding with the Croton WTP, NYCDEP will build a UV facility at Eastview that is the size of 2 football fields and 60 feet high. The overlap of Croton, Catskill/Delaware UV, Police Precinct, and possible the Kensico City Tunnel will create intolerable conditions for local residents and businesses. Cumulative impacts due to Croton WTP and the Catskill/Delaware UV facility will not be analyzed until between the Draft and Final SEIS. Per SEQR and CEQR, this is not allowed as the public will not be able to respond.	The combined impacts of these projects will be evaluated. The qualitative assessment in the Draft SEIS will be updated with quantitative information from the Catskill / Delaware design team that was not available when the Croton SEIS was published. Design information for the Police Precinct and KCT are not yet available. A quantitative analysis of the impacts of these proposed projects, to the extent that design information is available for each project, will be presented in the Final SEIS.	5.21.
322.	69, 70, 72, 76, 77, 495, 683, 802	NYC has for years been segmenting its applications. Different staffers propose different projects that are in effect a single operation. NYCDEP is segmenting the various projects at Eastview: WTP, impoundment, parking lots, and NCA are only discussed partially. Connection tunnels, connection of WTP to Shaft no. 19, Connection of Catskill aqueduct, police precinct, vehicle inspection area, UV plant, Catskill/Delaware WTP are not discussed at all. A single, comprehensive EIS must be completed that considers the combined effects of these projects. Further, these effects must be analyzed as part of a Draft EIS, and not presented in the Final (per SEQRA/CEQR). Combined impacts of these projects on rate payers must be explained.	Segmentation applies if pieces of the same project are considered in an environmental assessment separately. This was not the case here. The two large construction projects being considered for the Eastview Site (Croton WTP and Catskill/Delaware UV Facility) are considered separate projects subject to independent decision making. However, since the years in which operations would start are the same, and their potential for environmental impacts may overlap in the study area, the NYCDEP is assessing their combined potential for significant adverse environmental impacts, individually and cumulatively. The other projects mentioned are on different design and construction schedules. In accordance with SEQRA, each project undergoes an environmental review and the cumulative impacts of projects are evaluated to the extent possible. There is not enough specific design and construction information available currently to speculate, much less quantify, When those projects are further along in their design to permit a meaningful environmental assessment, their potential for environmental impacts will be assessed including and acknowledging the various environmental consequences of the actions that have occurred, or are predicted to occur from other NYCDEP, public or private actions as part of the future background conditions. Rehabilitation of the NCA is required regardless of whether the water required filtering or not. The Croton WTP project includes preparing the aqueduct to accommodate the filtered water, i.e., pressurization of the aqueduct. This is therefore not segmentation.	5.21.
Jerome Park Reservoir				
323.	146	Jerome Park Reservoir will be affected if plant is built at Van Cortlandt Park, but not if it's built at Eastview.	Work is required around Jerome Park Reservoir for all site alternatives. If the Eastview Site is selected and the Kensico-City Tunnel is adopted to convey the treated water work at Jerome Park Reservoir would be minimized.	8.2.1.

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324.	195, 351	The plant should not be built at Jerome Park Reservoir where it will affect people and students during construction. Construction may last for 5-7 years.	The plant will not be built at Jerome Park Reservoir. Construction at Jerome Park Reservoir predominantly would consist of decommissioning and dismantling several of the gate Houses and renovating the others. If the plant is built at the Harlem River Site or Mosholu, tunnels will be dug connecting the WTP to JPR. Tunneling would not produce potential significant long-term adverse noise level increases. However, NYCDEP acknowledges that noise level increases associated with any construction activity may be intrusive and annoying. NYCDEP would make every effort to reduce potential noise level increases by adopting engineering methods for construction that would produce the best combination of reducing the noise that is generated throughout the duration of activity. The connection shaft at Jerome Park Reservoir would be conducted by raised bore drilling technique. This is accomplished by using a machine from the bottom of the tunnel to bore up to the surface. All excavated material would be taken back out the tunnel to the WTP site. NYCDEP is very aware of the sensitive nature of schools in the vicinity of the Jerome Park Reservoir site. In addition, in response to public comment the noisiest work at the Jerome Park Reservoir site will be planned to occur during summers, weekends, and holidays (including school holidays) in order to reduce the effect of construction on nearby schools.	8.2.1. & 9.4.6.2.
325.	291	The Draft SEIS does not mention the impact of construction at the Bx. H.S. of Science.	Please see Section 8.2 of the Draft SEIS. The Draft SEIS does evaluate construction impacts numerous receptors in the vicinity of Jerome Park Reservoir, including the Bronx H.S. of Science.	8.2.3.2.6.
326.	352, 353, 366, 373, 390, 343, 397, 403, 430, 433, 434, 435, 439, 536, 540, 558, 584, 614, 631, 769, 917	High decibel noise from blasting, drilling, and other construction activities will disrupt school activities for years and may have adverse health effects on students and faculty. Schools are not sound-insulated enough to mitigate that level of noise. Sound walls will not mitigate the noise even though the Draft SEIS states that the noise will not constitute an impact.	Tunnels would be dug connecting the Harlem River or Mosholu Site alternatives to the Jerome Park Reservoir. The connection shaft at Jerome Park Reservoir would be conducted by raised bore drilling technique. This is accomplished by using a machine from the bottom of the tunnel to bore up to the surface. Most, if not all, excavated material would be taken back out the tunnel to the WTP site. NYCDEP is very aware of the sensitive nature of schools in the vicinity of the Jerome Park Reservoir site. In addition, in response to public comment the noisiest work at the Jerome Park Reservoir site will be planned to occur during summers, weekends, and holidays (including school holidays) in order to reduce the effect of construction on nearby schools.	8.2.3.2.6. & 9.4.6.2.
327.	344, 345, 386, 613, 615	Dust and dirt will be generated by construction, increasing the numbers of students with serious respiratory diseases. 200 Bx. H.S. students already are on the medical alert list. Schools are not equipped to filter out this level of dust and dirt.	The outside surface work near the Bronx High School of Science is not anticipated to raise much dust. Almost all of the excavation at this site would be done from the below-grade tunnel. The surface work would be like normal street work that supports utility projects throughout the City.	8.2.3.2.5.

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328.	346, 630	Blasting required to produce an elevator shaft and underground truck tunnel will compromise the stability of the buildings and infrastructures.	Blasting in shafts and tunnels would be very controlled. Many holes, containing sequenced charges weighing less than 5 pounds will be used to break rock in tunnel and shaft blasts. Open rock faces of tunnel and shaft walls would be adequately supported to prevent any ground movement that could impact any nearby structures or utilities.	8.2.3.2.6.
329.	347	Diesel trucks will use this new underground tunnel [at Jerome Park Reservoir] to carry chemical and equipment to the site. Fumes will create a hazard and potential respiratory ailments. Idling trucks will increase noise and pollution.	There would not be a permanent truck tunnel or conveyance for hazardous chemicals. The tunnel would be build to convey drinking water, but of course during construction equipment would be in the tunnel. Air quality must be regulated to protect worker safety within the tunnel. Any combustion equipment that is allowed in the drinking water tunnel would be carefully regulated and restricted and the exposure to the public outside of the tunnel to particulates would be negligible.	8.2.3.2.5.
330.	237, 348	Rats and mice whose habitats are disturbed by construction will seek refuge in nearby buildings, i.e. the local schools and residences.	A rodent control expert was retained by the NYCDEP to evaluate the risk of rats and rodents encroaching on local neighborhoods as a result of construction activities. The Draft SEIS (Public Health sections) describes that the sites in the Bronx are not currently good rodent habitat, so that the proposed activity would not drive rodents off the site and into neighborhoods. The real concern is that rats can be attracted to the debris on a construction site, increasing the existing local rodent population. A rodent control plan would be instituted by NYCDOHMH and supported by NYCDEP.	8.2.3.2.1.
331.	354, 355, 357, 367, 368, 370, 371, 374, 387, 393, 401, 633, 798	There are 25,000 students from DeWitt Clinton, Bx. Science, H.S. of American Studies, and Lehman College in the immediate vicinity of the proposed construction. This construction will not be conducive to learning. This does not reconcile itself with the city's stated intention of raising the quality of NYC education. This construction will ruin that environment. Commuting to and from school through a construction site will be disruptive and unsafe. Redirected traffic will increase the chances of students being hit and will add difficulty in getting to school.	Construction activities at the JPR will be a series of small and discrete projects focusing on the various gate houses already at the site. Much of the work will happen inside the gate houses themselves. Measures will be taken to lessen potential impacts to the area. During the peak construction year approximately 21 construction workers and approximately five trucks would work at the sites around Jerome Park Reservoir on any given weekday.	8.2.3.2.1.
332.	176, 372, 375, 376, 377, 384, 389, 402, 446, 565, 568	Jerome Park Reservoir is a peaceful spot at the heart of a living neighborhood. It is used by the community for recreation, relaxation, joggers, etc. Construction would destroy this important community asset and will disrupt the present tranquility and quality of life of thousands of local residents. The existing train yard is already a distraction that has hurt Bx. Science's reputation. This construction will further damage its appeal for gifted students and its reputation for academic quality. Whatever happens at JPR must be done with the utmost sensitivity.	Construction activities at the JPR will be a series of small and discrete projects focusing on the various gate houses already at the site. Much of the work will happen inside the gate houses themselves. Measures will be taken to mitigate any impacts to lessen project-related effects on the area.	8.2.3.2.

Item #	Comment Number	Comment	Response	Section Reference
333.	385	If anything needs to happen, the Bronx. High School of Science should be expanded as it is already over-crowded and congested.	This is outside the scope of this project.	N/A
334.	388	Blasting may loosen asbestos currently in the Bronx High School of Science.	The intensity of blast-induced motion in all buildings would not exceed 0.5 in/s. Motion of this level is not expected to loosen asbestos or cause any other form of damage or permanent physical changes in the structures. Pre- and post-construction surveys of buildings would be done to quantify any changes to foundations or interior structures.	8.2.3.2.6.
335.	177, 445, 447, 448, 449, 462	Jerome Park Reservoir should be developed as a park and place of recreation for public access. Building in Westchester would allow the Jerome Park Reservoir to be decommissioned and reverted to park land. The City and State must grant park status to Jerome Park Reservoir. Assuring the future of Jerome Park Reservoir must be pivotal in decision of where to site the WTP	Access to the perimeter road would still be problematic if Jerome Park Reservoir is taken off line (i.e. built in Westchester), because the Reservoir would be preserved for emergency use. Public access to the water's edge would be restricted for both public safety and security reasons.	8.2.1.
336.	466	Why is Jerome Park Reservoir being considered for off-site components? What alternatives were considered? There needs to be an environmental review for the work at Gate House No. 5	This information was provided in more detail in the Draft SEIS. In most cases they are existing facilities that are being upgraded, so alternatives are not appropriate. Jerome Park was originally built as the connection point for the entire Croton system because the filtration planned was planned for this site. The water must be conveyed to this point before it can flow to final users in Manhattan and the Bronx, as well as other parts of the City via high pressure connections. Gate House No. 5 is currently used for chemical treatment of the water supply. The proposed future use of this facility for the addition of potassium permanganate to treat the water is consistent with the existing use.	8.2.1.
337.	467	The need for work at Jerome Park Reservoir was not described, nor its relationship to federal requirements and the schedule.	The need for work at Jerome Park Reservoir was described in Section 8 of the Draft SEIS. This section was 188 pages long. Additional descriptions of the need for the various projects around Jerome Park Reservoir and the different level of effort for each WTP alternative will be provided in the Final SEIS.	8.2.1.
<i>New Croton Aqueduct</i>				
338.	24, 40	NYCDEP should fix both the NCA and the Delaware Aqueduct	The Baseline Rehabilitation project would rehabilitate the NCA as a raw water conveyance. If the WTP is built at Eastview then the NCA would be sealed and pressurized. The repair of the Delaware Aqueduct is in planning stages; it depends on having the Croton supply available.	8.1.1.

Item #	Comment Number	Comment	Response	Section Reference
339.	27, 95, 116 293, 504, 577, 595, 596, 953	The NCA is 110 years old, made of brick, and has not been adequately maintained. Contamination and leaks occur along its length. Most of the Croton shut downs were for maintenance and not for bad water. NYCDEP has not done a feasibility study for the NCA, but rather has chosen to filter instead of repairing the NCA. Boston won a court case not to filter by stating that it must fix its aqueducts first. NYCDEP must fix the aqueduct first before considering filtration. Color and odor problems can be the result of a degraded distribution system. The NCA should be lined and sealed along its entire length in order to protect against contaminant infiltration. Many of the water quality, odor, taste, and color issues would be solved this way.	The NCA is designed to allow infiltration. There are no plans to prevent infiltration of groundwater except for one alternative for the Eastview Site alternative that would use the NCA to convey treated water. This alternative would seal and pressurize the aqueduct. The Baseline Rehabilitation project would rehabilitate the NCA as a raw water conveyance but the weep holes would remain.	5.1.2.6.2. & 8.1.1.
340.	90, 91, 92, 292	NYCDEP is negligent in not maintaining the NCA. It is documented that NYCDEP has knowingly used polluted water. And it's suspected this was covered up. Rehabilitation plans are vague. The public can not totally trust the NYCDEP.	The NYC drinking water is tested continuously, and any contamination that exceeds the standards results in a system shutdown as required by the regulations and is immediately reported. Rehabilitation of the NCA is being performed as a separate action. The rehabilitation is required regardless of where or when the WTP is built. For one of the Eastview alternatives, the NCA will be pressurized. Because this scenario is an integral part of WTP construction at Eastview, NCA pressurization was included in the Draft SEIS.	Executive Summary, 2. & 8.1.1.
341.	486	The DSEIS suggests that the NYCDEP does not know what should be done about the NCA (pressurization, rehab, lining, work on shafts).	There are several alternatives under consideration for the future use of the NCA. The siting decision for the Croton WTP will narrow the list of options and lead to a final decision on the NCA. There is a commitment to complete the baseline rehabilitation because that work must be completed regardless of the choice of sites for the WTP.	3.7-10
342.	487	The KCT option is not fully explored. What improvements, if any, would be made to the NCA if the KCT were used to transport Croton water?	If the KCT were used to convey Croton water from the Eastview Site, the NCA would be used to supply some users in Westchester County, it would be available for plant overflows and pump shutdowns, and it would continue to supply Jerome Park Reservoir.	5.1.2.6.2. & 3.8.4.
343.	493	More information is required regarding the amount of water that could be discharged at NCA shaft no. 9. What is the danger to people from this scenario? An alarm should be installed to alert the PD, FD, and community in the case of a discharge.	This discharge is contemplated if the NCA is pressurized and the WTP is built at the Eastview Site. The amount of rise in the water is described in detail in Section 8.1.2.3.1. No structures would be impacted, and the water level in the Pocantico Rive where the public has access would increase over a period of several minutes; allowing people along the banks of the river to leave. The area immediately around the blow-off outlet at Carl's Brook is in NYCDEP property and is already restricted.	8.1.2.3.1.
344.	494	No details are provided in relation to work at NCA no. 10	The EAS for NCA Baseline Rehabilitation will discuss proposed work at NCA Shaft No. 10. The pressurization work as part of the Eastview construction does not include substantial work at Shaft No. 10.	8.1.1.

Item #	Comment Number	Comment	Response	Section Reference
345.	701	The DSEIS does not address how filtration will solve problem of contamination within the NCA. According to NYCDEP, raw water quality is important as it can't remove oil-based (and other) contaminants. A plan for NCA rehabilitation is not presented in the NCA.	Filtration is quite effective at removing oil-based solvents. There has been a lot of planning around this issue. The NYCDEP produced a document entitled <i>Plan for the Protection of Treated Water in the New Croton Aqueduct</i> in 2001. This is the basis for deciding that the aqueduct would need to be pressurized to carry treated water.	2.2.
346.	682, 721	The Draft SEIS should include work completed to prevent infiltration in the NCA and how much this will prevent contamination. Documentary evidence suggests infiltration poses a greater threat to Croton water quality than the reservoir system. We cannot evaluate the need for the project before the infiltration threat is taken care of. No serious discussion of how and when the NCA will be upgraded is provided.	See the preceding response. Infiltration into an untreated distribution system is a serious risk. Filtration of the water largely mitigates this risk.	2.2.
347.	853	The NCA work including lining must be explained.	This work is described in Section 5.1.6.2 of the Draft SEIS, Treated Water Conveyance, Eastview Site.	5.1.6.2.
Miscellaneous				
348.	669	The Final SEIS should commit to naming a community ombudsman available and accessible for inquiries and complaints from neighborhood residents regarding any and all environmental and quality of life issues that may arise during plant construction.	NYCDEP has instituted quality of life commitments and community feedback and communication into its contract specifications. The Construction Manager and Resident Engineer will be responsible for meeting all commitments made to the community. The 311 City communication line will funnel inquiries directly to the NYCDEP community affairs office, which is charged with being responsive to the public. In addition, a Facilities Monitoring Committee, with representation of the Bronx Borough President's Office, Community Boards, and NYCDPR will meet monthly or as needed to resolve issues. NYCDEP is also committing to an air and noise inspector with the responsibility for monitoring the construction related activities at the site.	Out of Scope of Final SEIS
349.	51, 54	The pictures in the Draft SEIS are inadequate. There's no way to know what you're doing, where and how you're doing it.	The Draft SEIS has many illustrations that are intended to communicate the plans as best as possible.	Universal
350.	61	The appendices contain 22,000 pages of material. The public review period is not long to review this material.	The review period was consistent with CEQR requirements.	CEQR Manual
351.	81, 82	Watershed protection should be the primary goal. But if the plant must be built, building it in NYC will cut off people living in upper Westchester from receiving filtered and clean water. This would be catastrophic for upstate water users.	The primary goal of the SEIS is to analyze the potential impacts of the alternative WTP sites in order to make a decision about the best site for the WTP. One of the impacts of the siting decision is that if the preferred site is in the Bronx, upstate users of Croton water would continue to receive unfiltered Croton water, as they do today.	2.4.1.
352.	83, 93,	Comments made by the public must be really acted upon and not just merely responded to. The NYCDEP must have a more open door policy. There is no regional approach to planning.	This Response to Comments lists numerous specific actions that will be included in the Final SEIS. NYCDEP tries to be as open as possible.	Universal

Item #	Comment Number	Comment	Response	Section Reference
353.	85, 230	The NYCDEP should engage the public in fact finding and developing plans that help shape decisions for the plant.	The purpose of this SEIS process and Departmental public outreach is to engage the public in decisions that reflect complex public policy decisions.	2.
354.	100	Filtration does not guarantee clean water: Milwaukee 1993: >100 people died, 4000 hospitalized, 400,000 affected. There was a filtration plant in place.	The system in Milwaukee in 1993 had a catastrophic failure of a filtration system that allowed pathogens that naturally occurred in the watershed to break through past the WTP and enter the distribution system. That was a wake-up call to the industry. Additional procedures and safeguards have been implemented to guard against such a failure. It is the view of all public health agencies that a properly run water filtration system is a better means of protecting public health than no water filtration.	Out of Scope of Final SEIS
355.	148, 169	DEP does not complete projects according to their schedule. Tunnel No. 3 is still not complete. There was supposed to be money for rehab but this has not been forthcoming. It was supposed to be finished 20 years ago. This also will be the case at Mosholu.	The current schedule anticipates a 5.5 year construction period. The Consent Decree carries penalties for construction delays, and the Contractors would be penalized if they do not meet the schedule.	Executive Summary 2.6.
356.	189, 190, 247, 248, 333, 337, 567	City and State leaders seem to be in lockstep over this and are not providing any alternatives or contributions on how to resolve this. Closed door deal making is unacceptable. Park land and public health should not be so readily given up. Many politicians have betrayed the Bronx.	The Community Boards requested a special presentation on the proposed project. It was outside their regular meeting schedules but the doors were not “closed.”	

Item #	Comment Number	Comment	Response	Section Reference
357.	198, 199, 323, 473, 527, 603, 610, 619, 918	Why is the analysis area at Eastview 1 mile radius but only ½ mile at Mosholu? The NYCDEP is trying to slant the data to give preference to Mosholu.	<p>Analysis based on transportation corridors, notably air, traffic, noise and components of the neighborhood character analysis all use linear study areas based on the most probably transportation routes between the sites and the major highways. Various analyses, such as land use and zoning, require the EIS to look at a study area. CEQR defines this study area as ½ mile in the City. In the case of Eastview and the off-site facilities, local features, zoning blocks, and facilities are more spread out. To account for this, study areas at these locations were increased to 1 mile. NYCDEP strives, when identifying a study area, to “cast the net” broadly enough to capture all of the potential significant adverse impacts expected to be relevant on a community. NYCDEP believes that it has captured the essence of the potential environmental impacts based on the current study area definitions and that if one were to go back and redefine the Bronx study areas to reflect a 1 mile radius, no change in the predicted environmental impacts on the communities surrounding the Mosholu or Harlem River Sites would be discernible. The circular study areas apply to: Land Use, Zoning and Public Policy, Visual Character, Community Facilities, Open Space, Neighborhood Character, Socioeconomic Analysis, Historic and Archaeological Resources, Hazardous materials, Natural Resources, Water Resources, Infrastructure and Energy, EMF/ELF, Solid Waste and Public Health.</p> <p>From a traffic perspective, this study area definition did not apply. Rather, a rational assignment of trips based on assumptions related to origin and destination were made. In addition, it is very important to note here that when assessing the potential for significant adverse impacts, if a particular significant adverse impact is identified, the significant impact will be defined relative to distance irrespective of the distance defined as a study area. For instance, if a potential significant adverse impact were identified due to noise level increases predicted at a receptor, those noise level increases would be plotted until they become less than significant noise level changes relative to distance. Furthermore, since many of the thresholds used to define significant adverse impacts are conservative as is the methodology used by NYCDEP to predict potential impacts, the point of maximum increase is identified regardless of the study area boundaries. It is hoped it is emphasized that potential significant adverse impacts would not be truncated, artificially by study area definitions.</p>	4.
358.	218	The mayor and commissioner said that the Catskill/Delaware is on the verge of collapse.	The mayor and commissioner were referring to infrastructure problems that are being addressed. The Catskill/Delaware is not on the verge of collapse.	Section 1.2. 2-4
359.	220, 321	The plant should be built in the Shandler field area as this is away from a dense community, with better truck access, and without bedrock directly underneath it.	The Shandler Recreation Area was analyzed in 1999 and it was determined that the impacts were less adverse at the Mosholu Golf Course. Shandler is not a site alternative and there are no plans to consider it as such.	1999 FEIS

Item #	Comment Number	Comment	Response	Section Reference
360.	225, 469, 471, 759, 820	The March 3 public was poorly administered where people were not allowed to talk. Also, NYCDEP would not answer questions at the meetings. The public participation process for this project has become meaningless.	The purpose of the meetings is to provide a forum for the public to comment on the Draft SEIS. These comments are then addressed as appropriate in the Final SEIS. The purpose is not for NYCDEP to respond to those comments.	See CEQR Guidelines
361.	232, 299, 309, 314, 394	People from the Bronx with different points of view on building the filtration plant need to find common ground so that union members have jobs and the watershed is protected. There needs to be arbitration.	This SEIS process is intended to allow an open forum for various public views.	See CEQR Guidelines
362.	240, 256	People protesting the plant are just playing politics. People should not miss this opportunity to repair parks	This SEIS process is intended to allow an open forum for various public views.	See CEQR Guidelines
363.	274	Elected officials and NYCDEP are constantly contradicting their own published documents.	NYCDEP tries to provide current information and the latest technical assessments. Sometimes this does lead to a change in views over time.	See FINAL SEIS
364.	282, 912	Contrary to the EIS process, Commissioner Ward appears hostile to discussing building in Eastview.	NYCDEP, as lead agency, will make the final site selection based on the potential environmental, social, and economic impacts at each site alternative.	See FINAL SEIS
365.	315	Why can't the City work out a deal whereby city workers don't lose out on jobs regardless of where it is built?	The NYCDEP can not stipulate what workers work at which site.	Out of Scope
366.	341, 541, 567, 583	Those who make this decision on site selection will be held accountable for their decisions. Ultimately the responsibility lies with the people who live here. The issue of construction at Mosholu is of great importance to many voting people. City needs to be sensitive to wishes of its citizens.	Noted	
367.	454	The Town of Greenburgh's unequivocal opposition to the plant dates back to 2001.	Noted	
368.	479	The DSEIS appears willfully evasive in that it does not fully reveal the extent of the planned project.	No attempt was made to evade disclosing information. Some engineering detail was not included because it is not relevant to the siting decision and does not affect impacts. Some information was not available as the project alternatives are still in Preliminary Design. The project description and all its components were described in detail in the information will be included in the Final SEIS.	3.
369.	591	Eastview wants the plant, Mosholu does not.	There are opposition groups at each of the proposed sites, and there are groups who welcome the project for each site. Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	1.5.2.
370.	647, 648	City officials are openly supporting selection of Mosholu before fair and transparent EIS selection process has been made. City assertions are not supported by DSEIS documents.	NYCDEP, as lead agency, will make the final site selection based on the potential environmental, social, and economic impacts at each site alternative.	Executive Summary 1.5.4

Item #	Comment Number	Comment	Response	Section Reference
371.	227, 649, 761	NYCDEP has solicited site preparation bids from contractors for Mosholu months before the SEIS process is complete. This suggests that the decision has already been made as where the plant will be sited.	This solicitation was done in order to permit compliance with a very aggressive construction schedule set out in the Consent Decree. NYCDEP determined that with the approval of alienation and the ULURP, the excavation at Mosholu must proceed early in the schedule in order to meet the construction deadlines imposed by the regulatory agencies. If the Mosholu Site is not selected this contract will not be awarded. Similar actions that are on the “critical path” for construction have taken place at other sites. For example, the City has asked the Town of Mount Pleasant to expedite its review of the pending Site Plan Application for that site; it has asked Westchester County for approval to pump solids to its water pollution control plant. All three sites have been maintained as viable options, but they do not have the same timetables.	Out of Scope of Final SEIS
372.	681	NYCDEP has polluted the water (one example being mercury pollution in Kensico reservoir). NYCDEP should stand down and begin doing the job of protecting the environment.	NYCDEP accepts its charge as being responsible for protecting water quality.	Out of Scope of Final SEIS
373.	752	Given the public and economic consequences of the project, public hearings should be held in all areas that pay and use Croton water, i.e. throughout the affected regions of the City and Croton Watershed. The SEIS is incomplete in its recognition of the need for participation of all stakeholders.	Public hearings were held in those areas where the WTPs may be physically sited.	Out of Scope of Final SEIS
374.	773	Building in the Bronx is environmentally unjust and unethical. Bronx politicians (except Dinowitz and Koppell) have abandoned their constituents.	There are opposition groups at each of the proposed sites, and there are groups who welcome the project for each site. Each of the sites has advantages and disadvantages to them. It is the purpose of the SEIS to help quantify those advantages and disadvantages.	1.5.2.
375.	824	The format for the EIS has changed too. In the 1999 FEIS and in the 2003 DEIS for the Cat Del UV Plant, construction impacts are a separate section. Even if the entire section had been duplicated as was done with the Kensico City Tunnel, it would be easier for the public and the decision maker to see the impact. (3.8.4 and 8.3 is same text on KCT).	An effort was made to avoid duplication and minimize the size of the document so that it would be easier to review. Construction impacts are described for each parameter for each site.	Throughout Document

Item #	Comment Number	Comment	Response	Section Reference
376.	840, 857	The agreement with the community groups, who have met with the NYCDEP for ten years, is that all study areas were to be the same size. In terms of population statistics, it is not fair to compare figures based on the block group, when there are smaller areas available. Moreover, the size should be comparable – in order to compare the sites. (See Draft SEIS MOSSOC page 3) In other words, if the agency has to use a one mile study area for Eastview, then they have to study one mile in the Bronx.	Study areas for projects in the City are one-half mile because this distance describes the surrounding neighborhood and facilities in an urban area. The larger one-mile radius was selected for the Eastview Site because most of the neighboring properties are large properties. A smaller area would not adequately characterize the immediate vicinity of the project. This rationale is described in Section 4.2 of the Draft SEIS. Note too that for Traffic and Transportation Impacts, and associated mobile source Air Quality and Noise Impacts the transportation corridors extended beyond the one-half or one-mile study areas to the major highway intersections in order to adequately characterize these impacts.	4.
377.	842	The agency may wish to adopt the Eastview flexibility advantage and find that the site allows the increase use of Croton Water, as well as the addition benefit to the people of Westchester, especially in the Town of Eastchester (and other New Rochelle United Water customers. This would be a good regional alternative.	The upstate users of Croton water would continue to be supplied with water irrespective of the choice of sites for the Croton WTP.	
378.	854	There is no index on the CD. Moreover there is no documentation for referenced info in the so-called "Appendix." This inhibits adequate comment.	The Table of Contents in the Draft SEIS was intended to point the reader to the sections of interest. The Appendices are the technical backup for those sections with voluminous backup. Each technical section of the Appendix has a Table of Contents if the section contains multiple sub-sections.	Out of Scope of Final SEIS
379.	877	Mount Pleasant's approval process has no timetable. Recommend starting the process in a timely manner to allow for this delay.	This process was initiated April 30, 2003, and a request is on file more recently to expedite the process.	
380.	883	The Feasibility Study for the Kensico City Tunnel and the plans for this project are not available to the public. The unavailability of all documentation for the entire Croton WTP project inhibits the public from submitting complete and adequate comments.	This document is available if requested.	Out of Scope of Final SEIS
381.	930	The promised \$200 million has already resulted in cuts to last year's park funding.	This statement is false.	6.5.3.1.
382.	951	The Final SEIS should commit to establishing a community advisory committee that would serve as a conduit between local communities and NYCDEP. The CAC should meet regularly, and receive briefings from senior construction personnel and monitoring programs.	The City Council Resolution that approved the ULURP for the Mosholu Site in 1999 committed NYCDEP to the support of a Facilities Monitoring Committee that shall meet monthly following approval of the site. This committed functioned effectively in 1999-2000 and will be restored if the Mosholu Site is selected.	Out of Scope of Final SEIS

**Author-Comment Cross Reference
Public Comments on Croton WTP Draft SEIS**

Croton Water Treatment Plant

Sources of Public Comments on the December 2003 Croton WTP Draft Supplemental Environmental Impact Statement

Speaker Number	Comment Number	Comment Sources	Author/Speaker
1	1-5	Mount Pleasant Public Hearing, February 25, 2004	Paul Finer, Supervisor Town of Greenburgh
2	6-16	Mount Pleasant Public Hearing, February 25, 2004	Marion Rose, Croton Watershed Clean Water Coalition (CWCWC)
3	17-20	Mount Pleasant Public Hearing, February 25, 2004	Paul Moskowitz, Huntersville Association
4	21-25	Mount Pleasant Public Hearing, February 25, 2004	Faye Muir, Croton Watershed Clean Water Coalition (CWCWC)
5	26-42	Mount Pleasant Public Hearing, February 25, 2004	George Klein, Atlantic Chapter, Sierra Club
6	43-46	Mount Pleasant Public Hearing, February 25, 2004	Arnold Frogel, NYC Group Sierra Club
7	47-56	Mount Pleasant Public Hearing, February 25, 2004	Karen Argenti, Friends of JPR/Bronx Council for Environmental Quality
8	57-63	Mount Pleasant Public Hearing, February 25, 2004	Jim Bacon, CWCWC/Town Board of New Paltz
9	64-78	Mount Pleasant Public Hearing, February 25, 2004	William Mulhern
10	79-82	Mount Pleasant Public Hearing, February 25, 2004	Judith Blau, Safety First of Eastchester (SAFE)
11	83-101	Mount Pleasant Public Hearing, February 25, 2004	Steven Kaplan, Hudson River Clean Water rep for CWCWC
12	102-128	Mount Pleasant Public Hearing, February 25, 2004	George Akitovich
13	129	Mount Pleasant Public Hearing, February 25, 2004	Santo Bastone
14	130-135	Bronx, NY Public Hearing March 3, 2004	Jeffrey Dinowitz, NYS Assemblyman for 81st District
15	136-141	Bronx, NY Public Hearing March 3, 2004	Jeffrey Kind
16	142-147	Bronx, NY Public Hearing March 3, 2004	G. Oliver Koppell, NYC Council Member, 11th District, Bronx.
17	148	Bronx, NY Public Hearing March 3, 2004	Christopher Peggin
18	149-150	Bronx, NY Public Hearing March 3, 2004	Kevin Johns, International Union of Operating Engineers, Local 15
19	151	Bronx, NY Public Hearing March 3, 2004	Bob Corbett, Bronx resident
20	152-153	Bronx, NY Public Hearing March 3, 2004	Jeffrey Warren, Bronx resident
21	154-160	Bronx, NY Public Hearing March 3, 2004	Howard Levinger
22	161	Bronx, NY Public Hearing March 3, 2004	Paul Luddine, Business Agent, Teamsters Local 282
23	162-164	Bronx, NY Public Hearing March 3, 2004	Jim Bacon, Attorney for Croton Watershed Clean Water Coalition (CWCWC)
24	165-166	Bronx, NY Public Hearing March 3, 2004	Christopher Pinto
25	167-171	Bronx, NY Public Hearing March 3, 2004	Paul Sawyer
26	172-177	Bronx, NY Public Hearing March 3, 2004	Adolpho Carrion, Bronx Borough President
27	178-180	Bronx, NY Public Hearing March 3, 2004	Glenda Self, Project Hire for Bronx Community College
28	181-184	Bronx, NY Public Hearing March 3, 2004	Marion Rose, Croton Watershed Clean Water Coalition (CWCWC)
29	185-186	Bronx, NY Public Hearing March 3, 2004	Jane Sokolov, Friends of Van Cortlandt South and Metro Forest Council
30	187-190	Bronx, NY Public Hearing March 3, 2004	Elizabeth Cooke-Levy, President Friends of Van Cortlandt Park
31	191-192	Bronx, NY Public Hearing March 3, 2004	Michael Gary, Bronx resident
32	193	Bronx, NY Public Hearing March 3, 2004	Frank Schimone, Business agent for Local Union 608
33	194-195	Bronx, NY Public Hearing March 3, 2004	Ezra Glaser

**Author-Comment Cross Reference
Public Comments on Croton WTP Draft SEIS**

Speaker Number	Comment Number	Comment Sources	Author/Speaker
34	196-199	Bronx, NY Public Hearing March 3, 2004	Ed Yaker, President Amalgamated Houses, Bronx.
35	200-204	Bronx, NY Public Hearing March 3, 2004	Muriel Axelbank, Bronx resident
36	205-207	Bronx, NY Public Hearing March 3, 2004	Jacklyn Rodriguez, Bronx resident
37	208	Bronx, NY Public Hearing March 3, 2004	Vincent Torres, Director Positive Workforce (job training)
38	209-211	Bronx, NY Public Hearing March 3, 2004	Joseph McManus, Speaker Local 638
39	212-215	Bronx, NY Public Hearing March 3, 2004	Ann Finizzi, Putnam county resident
40	216-220	Bronx, NY Public Hearing March 3, 2004	Frank Schonfeld, Bronx resident
41	221-224	Bronx, NY Public Hearing March 3, 2004	Thomas Messina, Int'l Brotherhood of Electrical Workers, Local 3
42	225-231	Bronx, NY Public Hearing March 3, 2004	Karen Argenti, Friends of Van Cortlandt Parl
43	232-234	Bronx, NY Public Hearing March 3, 2004	Thomas McCann
44	235-239	Bronx, NY Public Hearing March 3, 2004	Marsha Newman, Bronx resident
45	240-241	Bronx, NY Public Hearing March 3, 2004	Dennis Milton, Local 580
46	242-248	Bronx, NY Public Hearing March 3, 2004	Maya Homics, Kingsbridge Neighborhood Improvement Assoc.
47	249-252	Bronx, NY Public Hearing March 3, 2004	Greg Nolan, Int'l Operators Union, Local 15
48	253	Bronx, NY Public Hearing March 3, 2004	Paul Moskowitz, CWCWC
49	254-256	Bronx, NY Public Hearing March 3, 2004	Junior Campbell, Laborers Local 79, Community Board 11, Bronx Board of Business Agents
50	257-258	Bronx, NY Public Hearing March 3, 2004	Frederick Bully, Business rep for Sheet Metal Workers Local 28
51	259	Bronx, NY Public Hearing March 3, 2004	Jack Spiegel
52	260-266	Bronx, NY Public Hearing March 3, 2004	Fay Muir
53	267-277	Bronx, NY Public Hearing March 3, 2004	Anne Marie Garti
54	278-282	Bronx, NY Public Hearing March 3, 2004	Unknown speaker
55	283-287	Bronx, NY Public Hearing March 3, 2004	Lyn Pyle
56	288-290	Bronx, NY Public Hearing March 3, 2004	Jim Morgan, Lower East Side resident
57	291	Bronx, NY Public Hearing March 3, 2004	Stefan Mayer, President Parents Assoc. of Bronx H.S. of Science.
58	292-297	Bronx, NY Public Hearing March 3, 2004	Glenn Fleischmann, Clean Water for the Bronx
59	288-299	Bronx, NY Public Hearing March 3, 2004	Carl Schwartz, VP of NYC Clear Water,
60	300-302, 952-954	Bronx, NY Public Hearing March 3, 2004	David Ferguson, Croton Watershed Clean Water Coalition (CWCWC)
61	303-306, 955	Bronx, NY Public Hearing March 3, 2004	Dudley Kinsley, Plumbers Local 1
62	307	Bronx, NY Public Hearing March 3, 2004	Margaret Farrell
63	308-309	Bronx, NY Public Hearing March 3, 2004	Marion Feinberg
64	310-313	Bronx, NY Public Hearing March 3, 2004	Frank Eadie, Chair of Clean Water Committee, Sierra Club
65	314-318	Bronx, NY Public Hearing March 3, 2004	Gwynne Small, Bronx resident
66	319-323	Bronx, NY Public Hearing March 3, 2004	Louis Padilla, Bronx resident
67	324-328	Bronx, NY Public Hearing March 3, 2004	Christopher Picken
68	329-332	Bronx, NY Public Hearing March 3, 2004	Albert Spectman
69	333-337	Bronx, NY Public Hearing March 3, 2004	Myra Goggins, Bronx resident

**Author-Comment Cross Reference
Public Comments on Croton WTP Draft SEIS**

Speaker Number	Comment Number	Comment Sources	Author/Speaker
70	338-341	Bronx, NY Public Hearing March 3, 2004	Ken Fitch, Manhattan resident
71	342-350	Form letter from Bronx area residents	71 submissions
72	351-356	Letters from private resident	Ms. Daniela Vasquez, Bronx, NY
73	357-363	Letters from private resident	Jonelle Carrera, Laurelton, NY
74	364-365	Letters from private resident	Deirdre Radigan, NY, NY
75	366-369	Letters from private resident	Claude Moise, Bronx, NY
76	370	Letters from private resident	Richard Gentilviso, NY, NY
77	371	Letters from Bronx H.S. of Science students and faculty	Judith Schaffner, librarian
78	372-373	Letters from Bronx H.S. of Science students and faculty	Carina Ho, student
79	374	Letters from Bronx H.S. of Science students and faculty	Max Engel-Streich, student
80	375-377	Letters from Bronx H.S. of Science students and faculty	Abba Leffler, student
81	378-380	Letters from Bronx H.S. of Science students and faculty	Shoshana Leffler, student
82	381-383	Letters from Bronx H.S. of Science students and faculty	Ivy Tam, student
83	384-385	Letters from Bronx H.S. of Science students and faculty	Helen Susan Calica, parent of student
84	386	Letters from Bronx H.S. of Science students and faculty	C. N. Colon, parent of student
85	387-388	Letters from Bronx H.S. of Science students and faculty	Robert Drake, Ph. D., teacher
86	389-390	Letters from Bronx H.S. of Science students and faculty	Hsujen Yu, parent of student
87	391	Letters from Bronx H.S. of Science students and faculty	Irene Wu, student
88	392	Letters from Bronx H.S. of Science students and faculty	Maya Grinberg, student
89	393	Letters from Bronx H.S. of Science students and faculty	Sarah Schneider, student
90	394	Letters from Bronx H.S. of Science students and faculty	Ira Charles Levenberg-Engel, teacher
91	395-400	Form letter from Scott Tower Co-op residents	56 submissions
92	401	Letters from Bronx H.S. of Science students and faculty	Les Gurenich, student
93	402	Letters from Bronx H.S. of Science students and faculty	Anna Yakovleva, student
94	403	Letters from Bronx H.S. of Science students and faculty	Claudia Gorska, student
95	404-409	Letters from private resident	Sheila Murphy, Bronx, NY
96	410-412	Letter from Park Reservoir Corporation	Howard Leventhal, President
97	413-414	Letter from private resident	Mr. and Mrs. S. Rosenbloom, Bronx, NY
98	415-419	Letter from private resident	Rebecca Patt and Joseph Cohen
99	420-422	Letter from private resident	Steve Hopkins, New Rochelle, NY
100	423-427	Letter from private resident	Dunica Charles, Bronx NY
101	428-429	Letter from Sarah Lawrence College	Martin Goldray
102	430-432	Letter from private resident	Caitlin Naidoff
103	433-435	Letters from Bronx H.S. of Science students and faculty	Viviane Lampach
104	436-438	Letters from private resident	Samuel Katz, Bronx, NY
105	439-440	Letters from private resident	Eleanor Katz, Bronx, NY
106	441-444	Letters from private resident	Michael Katz, Bronx, NY

**Author-Comment Cross Reference
Public Comments on Croton WTP Draft SEIS**

Speaker Number	Comment Number	Comment Sources	Author/Speaker
107	445-449	Letter from Bronx Community Board No. 8	Anthony Perez Cassino, Chairman
108	450-453	Letters from CWCWC	Paul Moskowitz, Croton Watershed Clean Water Coalition
109	454-458	Letter from Town of Greenburgh, NY	Paul Feiner, Supervisor
110	459-463	Letter from City Council Member	G. Oliver Koppell, Council Member, 11th District, Bronx, NY
111	464-471	Letter from Jerome Park Conservancy	Tina Argenti, Chairwoman
112	472-477	Letter from Amalgamated Housing Corporation	Ed Yaker, President
113	478-497	Letters from private resident	William Mulhern, Hawthorne, NY
114	498-508	Letter from Putnam County Coalition to Preserve Open Space	Ann Fanizzi, Chair
115	509-525	Letter from Environmental Law Clinic	Edward Lloyd and Stuart Naifeh
116	526-531, 767-770	Letters from private resident	Sonja Geismar, Bronx resident
117	532-535	Letters from private resident	Bernie Goldray, Bronx resident
118	536-539	Letters from private resident	Winnie Yu, Bronx resident
119	540	Letters from Bronx H.S. of Science students and faculty	Gilbert Moss, student
120	541	Letters from private resident	Sol Shaviro, Bronx resident
121	542	Letters from private resident	Mr. and Mrs. N Bedrossian, Bronx, NY
122	543-544	Letters from private resident	Steve Hopkins, New Rochelle, NY
123	545	Letters from private resident	Susan Levine, NY, NY
124	546	Letters from private resident	Eric Blitz, Bronx, NY
125	547-548	Letters from private resident	Mary Pinaha, Bronx, NY
126	549	Letters from private resident	Annette Herson, Bronx, NY
127	550-561	Letters from private resident	Catherine Diab, Bronx, NY
128	562-563	Letters from private resident	Maria Awai, Bronx, NY
129	564-568	Letters from Bronx H.S. of Science students and faculty	Barry Polinsky, student
130	569-570	Letters from private resident	Barry Spekman, Bronx, NY
131	571-573	Letters from private resident	Albert Spekman, Bronx, NY
132	574-575	Letters from private resident	Nell Spekman, Bronx, NY
133	576	Letters from private resident	Alice Spekman, Bronx, NY
134	577	Letters from private resident	Amelia Perez, Bronx, NY
135	578-583	Letter from Woodlawn Preservation Assoc.	Sally Regenhard
136	957	Letters from private resident	Abraham Katz
137	584	Letters from Bronx H.S. of Science students and faculty	Marilyn Sam, student
138	585-587	Letters from private resident	Elsie Plotkin, Bronx NY
139	588-589	Letters from private resident	Barbara freshman, Bronx NY
140	590-593	Email	Ben Stock
141	594-596	Letter from CWCWC	Paul Moskowitz, Croton Watershed Clean Water Coalition
142	597-600	Letter of NYCLPC Environmental Review	NYCLPC
143	601	Email	John Reynolds, Bronx NY

**Author-Comment Cross Reference
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Speaker Number	Comment Number	Comment Sources	Author/Speaker
144	602	Email	Joan Boriss, Bronx NY
145	603-606	Email	Howard Levinger, Bronx NY
146	607-612	Email	Sonja Geismar, Bronx, NY
147	613	Email	George Berger, Hollis Hills, NY
148	614-616	Email	Noushin Sultana, Bronx NY
149	617-627	Email	Wendy Siegel, Bronx NY
150	628-634	Form Letter from Bronx H.S. Science faculty, parents, and students.	81 submissions
151	635-651, 956	Emails from Friends of Van Cortlandt Park	Elizabeth Cooke Levy, President
152	652-669	Letter Statement from Natural Resources Defense Council	Eric Goldstein and Robin Marx
153	670-676	Letter from Jerome Park Conservancy	Anne Marie Garti
154	677-689	Letter from Hudson River Sloop Clear Water	Andy Mele – Executive Director, Mannajo Greene – Environmental Director, Steven Kaplan, Ph. D., Croton Watershed Clean Water Coalition
155	690-718	Letter from Atlantic Chapter, Sierra Club	Carolyn Zolas, Chair
156	719-758	Letter from HDFC Council	David Ferguson, Croton Watershed Clean Water Coalition (CWCWC)
157	759-766	Letters from private resident	Thomas Grant, Bronx resident
158	771	Email	Rose Capozzelli
159	772	Email	Howard Levinger
160	773	Email	Sonja Geismar
161	774-780	Letters from private resident	Howard Leventhal, Bronx NY
162	781	Letters from private resident	Steve Hopkins, New Rochelle, NY
163	782	Letter from Historic Hudson Valley	Waddel W. Stillman, President
164	783-785	Letter from New York City Audubon	E.J. McAdams, Executive Director
165	786-792	Letter from State Historic Preservation Office	Kenneth Markunas, Restoration Coordinator
166	793-795	Letter from The City of New York Landmarks Preservation Commission	Gina Sausucci
167	796-801	The Council of The City of New York	G. Oliver Koppell, Council Member, 11th District, Bronx
168	802-814	Letter from CWCWC	Croton Watershed Clean Water Coalition
169	815	Letter from private resident	Ms. J Camas
170	816-817	Letter from private resident	Esther Gassman, Bronx NY
171	818-820	Letter from private resident	John J. Treacy, Bronx NY
172	821-901	Letter from the Friends of Van Cortlandt Park and the Friends of Jerome Park Reservoir	Tina Argenti, Karen Argenti, Jane Sokolow
173	902-903	Letter from private resident	Jim Morgan, Lower east Side resident
174	904	Letter from private resident	Jane E.S. Sokolow, Bronx NY
175	905-907	Letter from NYS Department of Environmental Conservation	John Cryan, Regional Permit Administrator

**Author-Comment Cross Reference
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Speaker Number	Comment Number	Comment Sources	Author/Speaker
176	908-909	Letter from NYPIRG Inc. and Riverkeeper Inc.	Cathleen Breen, Watershed Coordinator-NYPIRG and Leila Goldmark, Watershed Attorney-Riverkeeper, Inc.
177	910-912	Letter from Mosholu Woodlawn South Community Coalition	Margaret Groarke
178	913-916	Letter from the HDFC Council	David Ferguson
179	917	Letter from the Assembly of the State of New York, Albany	Mark S. Weprin, Member
180	918-930	Unknown	Unknown
181	931-940	Letter from Westchester Department of Planning	Gerard E. Mulligan, Commissioner
182	941-951, 973-974	Letter Statement from Natural Resources Defense Council	Eric Goldstein and Robin Marx
183	958-972	Letter from Bronx Environmental Health and Justice	Fay Muir