

**Water Filtration Plant
Town of Harrison, New York
Response to Comments on the Draft Scope For
the Draft Environmental Impact Statement (DEIS)**

Westchester Joint Water Works

Draft Scope Filing Date:	March 23, 2021
Scoping Hearing Date:	April 13, 2021
Last Date to Submit Comments:	May 10, 2021

Classification of Action: Unlisted

**Lead Agency: Westchester Joint Water Works
1625 Mamaroneck Ave
Mamaroneck, NY 10543**

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1. INDEX OF COMMENTS

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4/13/21	Transcript of Public Scoping Session	Eric L. Gordon, Keane and Beane P.C.	1
4/16/2021	Letter	Cynthia Garcia,, Supervisor, New York City Department of Environmental Protection	2
4/22/21	Letter	Philip Bein, Watershed Inspector General; Charles Silver, Ph.D., Watershed Inspector General Scientist; Claiborne Walthall, Assistant Attorney General; Environmental Protection Bureau, Office of the New York Attorney General	3
4/23/21	Letter	Darius P. Chafizadeh, Harris Beach, PLLC.,	4
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2. COMMENTS AND RESPONSES

This document summarizes and responds to the substantive comments on the Draft Scope that were received during the public scoping session on April 13, 2021, or during the period for submission of written comments, which ended on May 10, 2021.

2.1. PROJECT DESCRIPTION

Comment 2.1-1

The description of the Proposed Action requires additional information (6 NYCRR § 617.8(e)(l)).

The description of the Proposed Action provided within the DEIS Draft Scope is insufficient because it is too general and vague. The description of the Proposed Action should identify why the alternative solutions considered to address the deficiencies in water treatment raised in the June 9, 2004, Judgment and Order and USEPA Administrative Order are not feasible. At the very least, these alternatives should be considered as alternatives in the Final Scoping Document and studied in the DEIS. In addition, a complete cost analysis of the other proposed alternatives available that the WJWW determined needs to be included in the Final Scoping Document and studied in the DEIS to ascertain whether the construction of a pipeline for conveyance of treated water directly from New York City's Shaft 20 in Yonkers was appropriate or practicable.

(Document # 6, pgs. 2 - 3, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.1-1

The Draft Scope's description of the proposed filtration plant was adequate to allow public comment on the environmental analysis proposed for the DEIS. The commenter does not explain why the description of the proposed filtration plant was vague.

The Draft Scope identified several alternatives to be studied in the DEIS. In response to public comment, five Alternatives (numbered 5-9 in the Final Scope) have been added to the scope for the DEIS, including the construction of a pipeline from New York City DEP Shaft 20 in Greenburgh, NY (Alternative 9 in the Scope). It should be noted that the Draft Scope contained an error in referring to a Shaft 20 in Yonkers; Shaft 20 is located in the Town of Greenburgh (see Figure 1). This error has been corrected in the Final Scope.

The Alternatives section will include a discussion of approximate capital and operational costs to the Lead Agency where that data is available and pertinent to analyze an alternative.

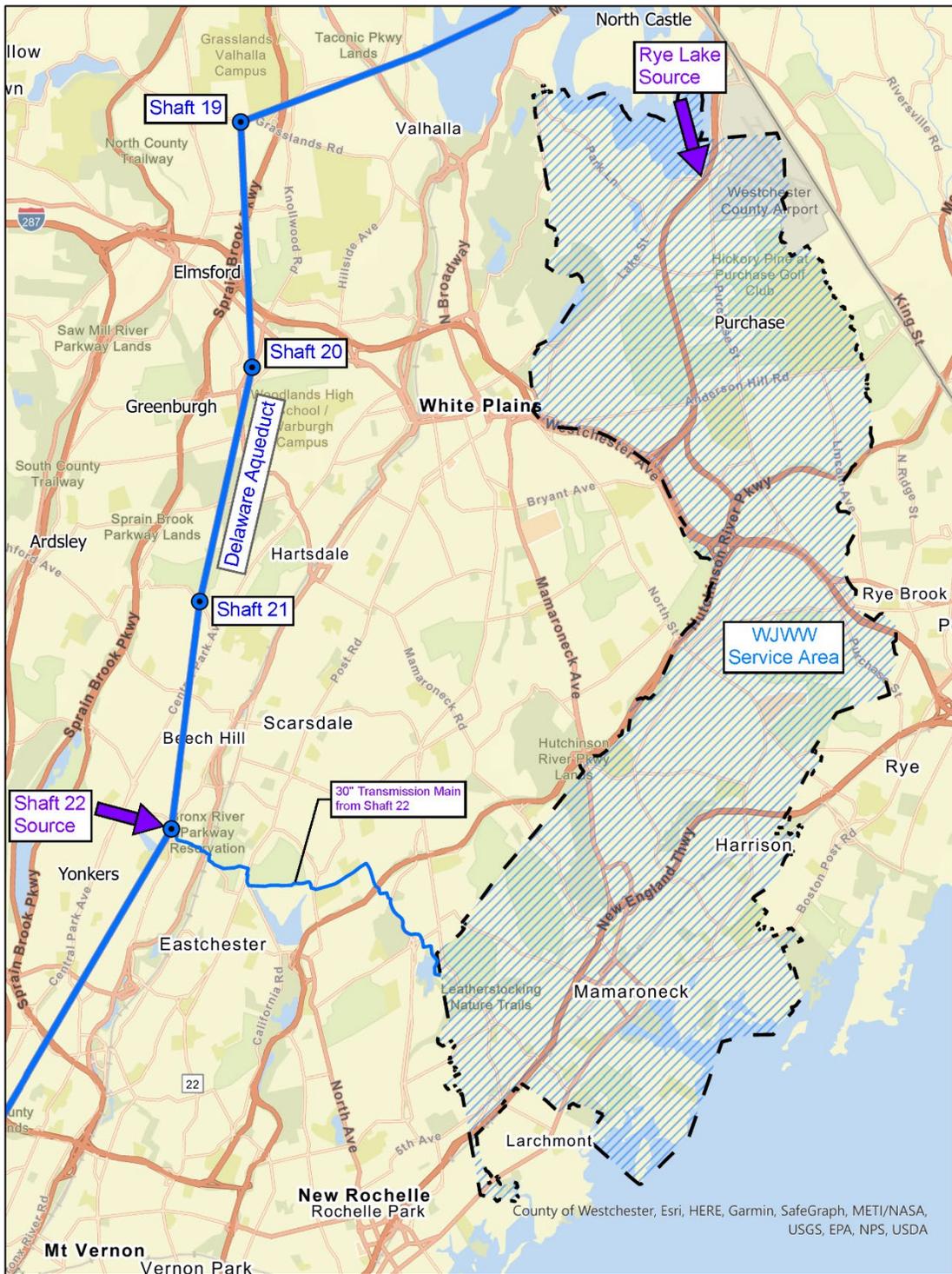


Figure 1: Map depicting Shaft 20, Town of Greenburgh, and Shaft 22, City of Yonkers. Source: WJWW, 2019

2.2. LAND USE, ZONING, AND POLICY

Comment 2.2-1

The DEIS should demonstrate that any new impervious surfaces proposed as part of the action, such as internal roads and parking areas, are the minimum necessary to meet local zoning requirements. Where feasible, it should be clear that the applicant has attempted to reduce impervious surfaces to levels below zoning requirements through variances, if necessary. Minimal access road widths, reduced building footprints, multi-level parking structures, banking of parking spaces, and the use of porous alternatives to asphalt paving are among the alternatives to consider.

(Document # 2, Cynthia Garcia, Supervisor, New York City Department of Environmental Protection, 4/16/2021)

Response 2.2-1

Based upon the Scope, Chapter 3.A.2, Land Use, Zoning and Public Policy of the DEIS will discuss the compliance of the Proposed Action with the Zoning chapter in the Town of Harrison Town Code and, therefore, the requirements for building coverage will be discussed. The potential for stormwater impacts, and any proposed mitigations are to be discussed in Chapter 3.F, Stormwater, of the DEIS, which will include a discussion of impervious surfaces and whether the design minimizes impervious surfaces.

Comment 2.2-2

An analysis of the Proposed Action as it relates to the Town of Harrison's Comprehensive Plan - does the Proposed Action comply with the Comprehensive Plan?

(Document # 6, Pg. 5, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.2-2

The consistency of the Proposed Action with the Village/Town of Harrison 2013 Comprehensive Plan will be discussed in Chapter 3.A.3, Land Use, Zoning and Public Policy of the DEIS.

Comment 2.2-3

According to the New York State Town Law (§272-a [11]) once a Comprehensive Plan is adopted by the local legislative body, all of the local government's land use regulations must be in accordance with it. Therefore, addressing conformance with the Town/ Village of Harrison Comprehensive Plan should be specifically included in the final scoping document. The 2013 Town/Village of Harrison Comprehensive Plan calls for preserving the existing low-density,

open, and rural character of Purchase and specifically recommends against new curb cuts on Purchase Street. The Plan also expressly promotes the following goals:

- Retain mature trees, stone walls, and other natural and built features which contribute to the character of the area.
- The old stone walls of Purchase comprise part of its character and need protection. In the main these are traditional dry-stack stone walls, built without the use of mortar. Some new developments have built mortared stone walls as their front property boundary, but the more traditional dry stack is preferable, as this method is historically correct for Purchase.
- The Town Code should be amended to include old stone walls as items that need to be shown on all site plans and subdivision plats, with the applicant being required to preserve these walls or to rebuild them where they are damaged.

The applicant should be required to reduce tree removal to the greatest extent possible and identify impacts to the historic stone wall along Purchase Street. Furthermore, it is clear from the Comprehensive Plan that the Town desires to continue low-density development in Purchase in order to maintain the low-density character of the area. The addition of a 30-MGD Dissolved Air Flotation/Filtration (DAFF) water filtration plant on 13.4 acres¹ that would stand at the very entry way to Purchase is in sharp conflict with this goal.

(Document # 10, pg. 1-2, Anne Gold, Executive Director, Purchase Environmental Protective Association, 5/10/2021)

Response 2.2-3

The consistency of the Proposed Action with the Village/Town of Harrison 2013 Comprehensive Plan will be discussed in Chapter 3.A.3, Land Use, Zoning and Public Policy of the DEIS.

2.3. COMMUNITY CHARACTER AND VISUAL IMPACT

Comment 2.3-1

For a large part of the year, the filtration plant will be visible from our property and graveyard and possibly from our Meeting House. We ask that you add one camera in addition to the ones that you show on Map 5: Visual Impact and place it on the stone wall that separates our property from your proposed building site so you can take this perspective into account as you work further on your plans.

(Document # 5, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 4/23/2021)

Response 2.3-1

The Scope now includes the point referenced above on Map 5: Visual Impact. The potential for visual impacts from that location will be discussed in Chapter 3.B.1 of the DEIS.

Comment 2.3-2

The proposed building appears to be many times the size and volume of our meeting house and other houses in our neighborhood. We are surprised that you would plan to put a facility of this size so close to our Meeting House and other homes on Purchase Street. We ask that you do all that you can to mitigate the impact of the size of your filtration plant on the enjoyment of our property and that of our neighbors on Purchase Street.

We look forward to working with you as you develop further details of your plant's design and location. We hope you will be open to our suggestions for blending the appearance of the plant in with the residential nature of our neighborhood and otherwise lessening its impact.

Approximately 25 years ago, we worked very closely with the County Airport on mitigating the impact of tree-cutting on their land that surrounds our graveyard and Meeting House property and we would hope to work as closely with you as well!

(Document # 5, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 4/23/2021)

Response 2.3-2

The Scope outlines that Chapter 3.B.1 of the DEIS will include illustrative renderings of the proposed project and describe the project in relation to surrounding buildings and uses using NYSDEC Program Policy, Assessing and Mitigating Visual Impacts, DEP-00-2 (posted on NYSDEC web site) as a guideline. Visual screening will also be discussed in the DEIS.

Chapter 3.A, Land Use, Zoning and Public Policy of the DEIS will discuss project consistency with the Town/Village of Harrison zoning and surrounding land uses.

Comment 2.3-3

Visual impacts to residents along Kempner Lane and Tower Road.

(Document # 6, Pg. 3, Eric L. Gordon, Principal Member, Keane and Beane P.C., 4/23/2021)

Response 2.3-3

Map 5: Visual Impact shows the intersections to be evaluated as part of the DEIS. Kempner Lane and Tower Road are both included on the map in the Scope.

Comment 2.3-4

Potential impacts associated with removal and modification to the existing vegetation and landscaping along Purchase Street, Tower Road and Kempner Lane.

(Document #6, Pg. 4, Eric L. Gordon, Principal Member, Keane & Beane P.C., 4/23/2021)

Response 2.3-4

The existing and proposed landscape conditions will be described through text and visual renderings as part of Chapter 3.B, Community Character and Visual Impacts of the DEIS as outlined in the Scope. This will include proposed areas of clearing and new landscape plantings.

Comment 2.3-5

Obviously community character and visual impacts we appreciate that, but especially the views from all the Kempner Lane properties or from the Purchase Street properties up and down, I know there was a -- I know you said that you were going to be looking at it, but there should be a visual analysis for each of those properties of what this plant could look like and as compared to the potential of the plant being you know, placed down Tower Road and how that's gonna look and I believe it is gonna be much less impactful than this present one.

So those are the -- you know, with respect to impacts on properties. Again, the alternatives on building designs are of primary importance. I was glad to see there is an alternative for you know, facade and how that could sort of could be blend in more as a residential property, obviously considerations of decreasing the height of the building if there is any way to further decrease the height of the building so it is further hidden should be analyzed. And then you know again, the mitigation of the impacts to the properties on Kempner Lane and Purchase Street.

(Document #1, pg. 38 -39, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2.3-5

The existing and proposed landscape conditions will be described through text and visual renderings as part of Chapter 3.B, Community Character and Visual Impacts of the DEIS and outlined in the scope. This will include proposed areas of clearing and new landscape plantings. The height of the building conforms with zoning which will be discussed in Chapter 3.A Land

Use, Zoning and Public Policy. A reduction of building height beyond that proposed is not being considered in this DEIS. Constructing the building deeper underground has been reviewed from an engineering perspective, which identified significant issues, including reduced safety for operations personnel, environmental impacts due to the removal of additional excavation material, additional structural materials needed, and the need for additional groundwater pumping, treatment and discharge. Accordingly, constructing the building deeper underground will not be studied in the DEIS as an alternative or mitigation measure.

Comment 2.3-6

We request that you add two locations to your analysis: One directly in front of the Meeting and one behind the Meeting House

(Document # 9, pg. 2, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.3-6

The referenced points have been added to Map 5: Visual Impact and are included in the Scope to be discussed in the DEIS as shown on Map 5.

Comment 2.3-7

Provide the actual dimensions of the plant including height, width and depth as well as total volume; Provide the dimensions including total volume of the parts of the plant that will be built below ground level. Future Expansion of the Filtration Plant and Placement of Other WJWW Facilities on the 13.4 acre site: The proposed land swap with the Westchester County Airport will have the WJWW plant directly abutting two sides Purchase Meeting's graveyard; Further development of the 13.4 acre site will be detrimental to our enjoyment of our property; Provide adjoining property owners including Purchase Meeting covenants against further expansion or additional construction of WJWW facilities on this site.

(Document # 9, pg. 4, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.3-7

The dimensions of the plant will be discussed in Chapter 3.A of the DEIS, Land Use, Zoning and Public Policy, as well as in Chapter 2, Project Description. Site plans will be provided as part of the DEIS, including scaled drawings and dimensions of the project.

The proposed land swap will be discussed in the the DEIS as outlined in the Scope. No further expansion or additional construction of WJWW facilities at the proposed site of the filtration plant have been proposed or are anticipated; accordingly, the DEIS will not assess the

environmental impacts of such hypothetical additional facilities. In the future, however, if additional facilities were to be proposed, any such proposal would be subject to SEQRA and all applicable land use approval requirements.

Comment 2.3-8

So, with those alternatives I am just gonna go through some of the other items that you have in the proposed scope. So, as far as future -- you know as far as impacts on land uses again, we - you know we understand you are gonna be discussing the impacts on all land uses, we just you know, given the substantial nature of the screening in the area where this plant is to be located, you know we do think that their focus should be on the residential areas across from the camp, not on the fact that there is a -- an airport property. Again, the location provides screening from a lot of those residential properties from the airport and you are eliminating a lot of that screening.

So in considering the existing conditions and those, you know, the impacts you're gonna have we would ask that you consider the residential properties as the priority here.

(Document #1, pg. 36 -37, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2.3-8

Map 5: Visual Impact, in the Scope depicts the location and direction of visual renderings to be prepared as part of the DEIS. The analysis will demonstrate the degree to which the project may be visible from public vantage points. The majority of these points are located along Purchase Street from the direction of residential properties into the project site.

2.4. FISCAL AND ECONOMIC IMPACTS

Comment 2.4-1

Chapter 3, section C, subsection (2), paragraph (b) of the Draft Scope requires that the DEIS contain "A summary and assessment of the impact to [sic] the proposed Project on the water rates for WJWW's customers."

This requirement would presumably be satisfied in the DEIS by projecting the future annual costs of the filtration plant project (including debt service), allocating them to WJWW's existing customer base on top of existing water rates, and dividing by existing water rates to arrive at a percentage increase each year. This is likely the basis for the statement "Water rates will tick up to about 7% annually for the next five years, according to the WJWW" in the Journal News article of April 12, 2021, the subject of which was the filtration plant project.

By itself, this disclosure would present a misleading and inaccurate picture of what is expected to happen to water rates. WJWW has other capital projects planned during the period that will also affect water rates. In addition, WJWW will undoubtedly increase water rates over the applicable period to cover increases in operating costs unrelated to the filtration plant project.

As with the analysis of other potential impacts, the DEIS should address the potential cumulative financial impact on water rates of the construction of the filtration plant in combination with WJWW's other proposed or approved projects, plus estimated increases to cover WJWW's rising operating costs. We understand that the latter are often difficult to estimate as they depend, in part, on rate increases determined by New York City water authorities. Nevertheless, it is important to arrive at an estimate of the increased cost to residents.

(Document # 7, pgs. 1 – 3, Frank Gordon, Rachel Berkey, Adam Weiner, Candidates for Harrison Town Board, 4/23/2021)

Response 2.4-1

Section 3.C, Fiscal and Economic Impacts, of the DEIS will provide a summary and assessment of the impact of the proposed project on the water rates for WJWW's customers as outlined in the Scope.

Comment 2.4-2

Cost analysis of alternatives and the financial impacts to residents benefitted by the Project.

(Document # 6, Pg. 5, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.4-2

Section 3.C, Fiscal and Economic Impacts, of the DEIS will provide a summary and assessment of the proposed project's impact on the water rates for WJWW's customers as outlined in the Scope. The cost of operations and maintenance to the Lead Agency for Chapter 5, Alternatives, will be discussed where it is required to assess an alternative.

Comment 2.4-3

As far as the fiscal condition, fiscal and economic you know, there is a brief you know, description of a potential 7 percent impact over five years -- 7 percent increase. I really think there needs to be a full forensic analysis of the potential cost increases of a hundred million plus potentially more plants, you know, a real deep dive into the cost of the plant and the potential increases of rates, what the borrowing is gonna be and how this is gonna impact all of the property owners who are serviced by Westchester Joint Water Works. I think this is a incredibly important part of this that the public needs to be made aware of, and a full study

done, not a summary and assessment but a real forensic analysis of what the cost are gonna be and how this is gonna impact the rates of all the Westchester Joint Water Works customers and over how long a time. So that's very important and I think it needs to be analyzed more. (Document #1, pg. 33 -35, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2.4-3

Section 3.C of the DEIS will provide a fiscal impact analysis and a summary and assessment of the proposed project's impact on the water rates for WJWW's customers as outlined in the Scope. The analysis described in the scope is sufficient.

2.5. TRAFFIC AND TRANSPORTATION

Comment 2.5-1

Traffic impacts associated with the location of the access to the Project and residents entering and exiting from Kempner Lane.

(Document # 6, Pg. 4, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.5-1

The DEIS will collect data from the intersections at Purchase Street and Lake Street, and Purchase Street and Tower Road. Kempner Lane is a dead-end road that must be accessed via one of the intersections that will be studied.

Comment 2.5-2

With respect to parking vehicle access and road systems, again, you seem to have the access coming directly off of Purchase Street. There was an alternative at one point where Tower Road was the entrance and then there was gonna be another road that led into the current site, you know. Again, to the extent that the alternative -- the Tower Road -- the site near Tower Road you know, is deemed not feasible which we gain think should be studied and then analyzed, we would ask that the existing Tower Road site be the entrance or be considered as the entrance and not there be the alternative road access to the plant rather than an entrance off Purchase Street that would sort of be an opening to all of -- you know a lot of those residences and directly across from the Kempner Lane access, which is problematic especially given the amount of traffic -- the traffic and the employees and everybody coming in and out of this area, which again, is basically undeveloped right now even though the airport is set the further back.

(Document #1, pg. 37-38, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2.5-2

The use of Tower Road as an entrance has been added as Alternative 5 in the Scope and will be discussed in the DEIS.

Comment 2.5-3

And I had mentioned with respect to traffic, access from Tower Road, studying you know why the traffic -- I'm sorry the access from Purchase Street as compared to Tower Road comparing those two requirements and why Tower Road can't be used if this site is the site that is selected.

(Document #1, pg. 43, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2.5-3

The DEIS will collect and analyze data from the intersections at Purchase Street and Lake Street, and Purchase Street and Tower Road. The use of Tower Road as an entrance has been added as Alternative 5 in the Scope and will be discussed in the DEIS.

Comment 2.5-4

In addition to condition already outlined please add the size of the trucks and their maximum weight. Please also add weekends to the Traffic Data Collection and any other hours in addition to those stipulated (AM and PM peaks) that the facility will be in operation and could potentially have any traffic.

(Document #9, pg. 2, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/21)

Response 2.5-4

Chapter 3.K.2.c of the DEIS will discuss on-site traffic access and circulation, including stopping sight distances and truck turning analyses at the site driveway and intersections, as outlined in the Scope. This will include the anticipated size of the trucks and hours/days of operation.

2.6. NOISE

Comment 2.6-1

We have a caretaker for our property who is required to live in an apartment that is the closest part of our Meeting House to your proposed plant. In addition to noise disturbance, we are also

concerned about any odors that your filtration plant might produce and hope you will address this issue further.

(Document #5, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 4/23/2021)

Response 2.6-1

Potential impacts due to odors have been added to the Scope and will be discussed in the DEIS in Chapter 3.M, Air.

Comment 2.6-2

The current plan shows the entrance to your facility will come off Purchase Street. We are concerned about the additional noise that will be caused by trucks pulling out into traffic and braking to get ready to turn into your entrance. We would ask that truck traffic using this entrance be restricted to weekdays. We also believe that adding this additional roadway cut onto Purchase Street will add an unnecessary traffic hazard as cars enter and exit onto Purchase Street. We think that the conceptual design that you presented a year ago last fall where you planned to use existing access to Tower Road as your facility entrance is a far safer and quieter choice. We suggest that you should consider studying this further.

(Document #5, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 4/23/2021)

Response 2.6-2

The potential for traffic impacts (including the potential for traffic safety impacts) will be analyzed in Chapter 3.K of the DEIS. The potential for noise impacts as a result of traffic will be discussed in Chapter 3.L of the DEIS as outlined in the Scope. Use of Tower Road for the facility's driveway has been added as an alternative in Chapter 5 of the DEIS.

Comment 2.6-3

As Quakers, our manner of worship involves waiting in silence and speaking out of the silence as we feel led. We are very concerned about the noise that the operation of such a large filtration plant might generate during our periods of worship. We hope you will further address any noise pollution that will be generated by the plant and how you propose to mitigate it.

(Document #5, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 4/23/2021)

Response 2.6-3

Noise is addressed in Chapter 3.L of the DEIS. As outlined in the Scope, it is anticipated that operational truck traffic would occur no more than twice per week, and the DEIS will discuss the potential for noise impacts as a result of the proposed project. Construction-related noise will also be assessed as part of this section.

Comment 2.6-4

The proposed project is located within the Westchester county airport 60 Ldn noise contour critical environmental area. The town of Harrison noise ordinance also needs to be considered in examining potential adverse environmental impacts. The town noise ordinance limits power tool noise to 70 dBA Lmax, air compressors are limited to 76 dBA, and chainsaws are limited to 85 dBA (measured at the property line). As a result, determining existing noise levels is very important to accurately determine whether or not the Proposed Action will result in any adverse noise impacts and the final scoping document should study potential noise impacts both during construction and when built, including impacts on the friend meeting house.

(Document #6, Pg. 5, Eric L. Gordon, Principal Member, Keane and Beane P.C., 4/23/2021)

Response 2.6-4

Construction noise and operational noise and the project's adherence to Chapter 177, Noise, of the Town of Harrison Town Code will be discussed in the DEIS Chapter 3.L as outlined in the Scope.

Comment 2.6-5

Please provide exact locations of monitoring sites and include one on each side of the Quaker Meeting House. Please also include weekends, particularly Sunday morning to the study. Please also include noise impact during each phase of construction.

(Document #5, pg. 3, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.6-5

As outlined in the Scope, noise will be calculated at the property boundaries of the project site. This includes any boundaries shared with the meeting house. The potential for noise impacts will be analyzed for operations and construction. The Town of Harrison does not allow construction on Sundays, and this requirement would be followed during construction of the project.

2.7. AIR

Comment 2.7-1

Our Resident Caretaker, Noise and Odors:

We have a caretaker for our property who is required to live in an apartment that is the closest part of our Meeting House to your proposed plant. In addition to noise disturbance, we are also concerned about any odors that your filtration plant might produce and hope you will address this issue further.

(Document # 5, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 4/23/2021)

Response 2.7-1

The Scope has been revised to include the potential impacts of odor. Chapter 3.M of the DEIS will include a qualitative assessment of odor.

Comment 2.7-2

Westchester County is a nonattainment area for ozone and fine particulate matter (PM_{2.5}), and a maintenance area for carbon monoxide. The air quality existing conditions section of the scope should require attainment/nonattainment status and provide the most recent available design values for criteria pollutants at representative monitor. Monitor concentrations of criteria pollutants should be compared to the National Ambient Air Quality Standards (NAAQS).

(Document #6, Pg. 5, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.7-2

Westchester County is not designated as a nonattainment for fine particulates (PM_{2.5}), but it is designated as a nonattainment for ozone, a regional pollutant. See <https://www3.epa.gov/airquality/greenbook/ancl.html>. Chapter 3.M, Air, of the Scope has been revised to refer to the US Clean Air Act National Ambient Air Quality Standards. The DEIS will discuss air quality conditions for the region and the project site.

Comment 2.7-3

We request that in addition to the qualitative analysis of the potential air impacts resulting from site preparation, and post-construction activities dust meters be installed at the site.

(Document #9, pg. 3, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.7-3

Chapter 3.O, Construction, will discuss construction impacts on air, including dust. A dust mitigation plan will be prepared as part of the construction contract. The operation of the filtration plant would not generate any significant dust; accordingly, post-construction dust meters are not necessary.

2.8. LIGHT

Comment 2-8.1

Glare and other light pollution impacts to residents along Purchase Street, Kempner Lane and Tower Road.

(Document #6, Pg. 4, Eric L. Gordon, Principal Member, Keane and Beane P.C., 4/23/2021)

Response 2-8.1

Site lighting will be discussed in Chapter 2.D of the DEIS, Project Design and Layout, and Chapter 3.B, Community Character and Visual Impacts. Potential impacts related to site lighting will be discussed for locations along Purchase Street, Kempner Lane, and Tower Road as outlined in the Scope.

Comment 2-8.2

Obviously lighting and landscaping. We know you are going to take it into account, but again, given the proximity to residential properties, we want to make sure that is studied and analyzed and the impacts to those properties should be analyzed.

(Document #1, pg. 38, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2-8.2

Site lighting will be discussed in Chapter 2.D of the DEIS, Project Design and Layout, and Chapter 3.B, Community Character and Visual Impacts. Potential impacts related to site lighting will be discussed for locations along Purchase Street, Kempner Lane, and Tower Road as outlined in the Scope.

2.9. OTHER ENVIRONMENTAL IMPACTS

Comment 2-9.1

The 2018 amendments to the SEQR regulations also require all agencies to evaluate Greenhouse Gas ("GHG") impacts in a separate section of the EIS specifically dedicated to climate change and its impacts. The analysis may help the WJWW identify reasonable energy

conservation measures and recommendations in its SEQRA findings to minimize GHG emissions from the Proposed Action.

(Document #6, Pg. 5, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.9-1

Energy use, energy efficiency and conservation measures will be discussed in Chapter 4 of the DEIS as outlined in the scope.

Comment 2.9-2

We request that you include an analysis of the change in the carbon footprint at this location, assuming standard analysis techniques, allowing for the negative carbon footprint of trees, particularly mature trees. Please discuss in detail and mitigation measure that might be taken to reduce the carbon footprint of this structure. We request an analysis of the carbon impact of tree removal.

(Document #9, pg. 2, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.9-2

The operational carbon footprint of the filtration plant and any carbon offset strategies employed by the Proposed Action will be discussed in Chapter 4 of the DEIS as outlined in the scope. In addition, a qualitative analysis of the carbon impact of the tree removal and replacement and construction will also be undertaken in Chapter 4. A quantitative description of tree removal and replacement will be discussed in Chapter 3.H, Vegetation and Wildlife.

2.10. GEOLOGY- SOILS AND TOPOGRAPHY

Comment 2.10-1

The DEIS must include a list of Natural Resource Conservation Service (NRCS) soil types, a description of soil characteristics, and an analysis of the limitations of each soil type with respect to stormwater management and erodibility during construction.

In addition to the information included in the Draft Scope, the DEIS should clearly quantify the extent of disturbance with respect to the sites slopes (e.g. 0-10%, 10-15%, and >15%) and present a detailed discussion of erosion and sediment control practices that will be utilized both during and after construction. Long term potential impacts associated with post-development runoff characteristics due to changes in land cover and topography should also be identified and included in the discussion.

(Document #2, pg. 2, Cynthia Garcia, Supervisor, SEQRA Coordination Section, 4/16/2021)

Response 2.10-1

Chapter 3.G of the DEIS will discuss the following:

- soils and topography, including any impacts to slopes;
- a list of soil types found on site;
- a preliminary cut and fill analysis;
- compliance with Chapter 199, Steep Slopes Protection of the Town Code;
- the preliminary grading plan; and
- limits of disturbance as outlined in the scope.

Chapter 3.F of the DEIS will discuss the potential for stormwater impacts, including erosion and sediment control measures.

Comment 2.10-2

We request that any on site storage of earth materials be clearly describes and potential impacts be determined.

(Document #9, pg. 2, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.10-2

Chapter 3.G of the DEIS will discuss soils and topography, including a cut and fill analysis and how excess earth materials will be removed from site, as outlined in the Scope. The chapter will also discuss compliance with local stormwater management regulation Town Code Chapter 130 Stormwater Management and Erosion and Sediment Control. Chapter 3.O, Construction, will discuss construction staging and management of fill export and import.

2.11. STORMWATER

Comment 2.11-1

We write to recommend that the stormwater management section of the Project's DEIS include the most recent and accurate climate data in stormwater planning, and fully address potential significant adverse impacts to water quality in Rye Lake/Kensico Reservoir.

(Document #3, Pg. 1, Philip Bein, Watershed Inspector General; Charles Silver, Ph.D., Watershed Inspector General Scientist; Claiborne Walthall, Assistant Attorney General; Environmental Protection Bureau, Office of the New York Attorney General, 4/22/2021)

Response 2.11-1

The stormwater management section of the DEIS will include the most recent and accurate climate data in stormwater planning and assess potential significant adverse impacts to water quality in Rye Lake/Kensico Reservoir, in compliance with all federal, State, and local rules and regulations. Refer to Response 2.11-2 for additional detail.

Comment 2.11-2

According to Stormwater Section F1.c. on page 16 of the Final Corrected Notice of Scoping for the Preparation of a Draft Environmental Impact Statement (DEIS), March 2021, the DEIS will calculate and describe pre-development peak run-off rates for the 1-, 10-, 25- and 100-year storm events. Essential to calculating the pre- and post-development peak run-off rates for the 1-, 10-, 25- and 100-year storm events is the underlying climate data, as extreme precipitation events can result in stormwater pollution and localized and widespread flooding with damage to property, degradation of water quality, and possible loss of life. Accounting for these events is critical to effective engineering design and regulations. In January 2011, the Northeast Regional Climate Center (NRCC) website www.precip.net was created to provide access to and produce tables of current meteorological data. The DEIS needs to pair the current updated rainfall values with updated distribution curves to generate accurate rainfall runoff relationships. This can be accomplished by importing the updated NRCC rainfall value table into a HydroCAD (or other applicable hydrologic model) program, to create updated rainfall distribution curves. A step-by- step description of this process is presented on page B.6 in Appendix B of the November 2016 New York Standards and Specifications for Erosion and Sediment Control "Blue Book". Once these new rainfall distributions have been incorporated into the HydroCAD or another applicable model, the program should be run. The results from this program should more accurately predict stormwater runoff performance based on current climate data.

(Document #3, Philip Bein, Watershed Inspector General; Charles Silver, Ph.D., Watershed Inspector General Scientist; Claiborne Walthall, Assistant Attorney General; Environmental Protection Bureau, Office of the New York Attorney General, 4/22/2021)

Response 2.11-2

The DEIS will describe pre- and post-development peak runoff rates for the 1-, 10-, 25-, 100, and 500-year storm events based on current climate data. These peak runoff rates will be calculated using HydroCAD, a hydrologic model program, applying the updated NRCC extreme precipitation values and distribution curves. The NRCC rainfall value table was imported into HydroCAD using the process described in the November 2016 New York Standards and Specifications for Erosion and Sediment Control "Blue Book".

Comment 2.11-3

The draft Stormwater Pollution Prevention Plan (SWPPP) should be of sufficient detail to allow for a full evaluation of potential adverse water quality impacts and the adequacy of measures designed to avoid or mitigate those impacts. The SWPPP should include a detailed description of proposed stormwater management facilities, delineation of pre- and post-development drainage boundaries, a comparison of pre- and post-development stormwater runoff quantity and quality, delineation of soil types found in the project area, soil tests results, and a detailed construction sequence keyed to specific erosion and sediment control practices.

The DEIS must address the project's conformance with the permitting requirements noted in Section 18-37 and 18-39 of the Rules and Regulations for the Protection from Contamination, Degradation, and Pollution of the New York City Water Supply and its Sources (Watershed Regulations), namely, DEP's wastewater collection system and SWPPP approvals.

With regard to the SWPPP, in accordance with the Watershed Regulations, note that any plan that results in impervious surfaces covering twenty percent (20%) or more of the drainage area for which a stormwater management practice is designed, the SWPPP shall provide for stormwater runoff from that drainage area to be treated by two different types of stormwater management practices in series, except that only one practice is required if the practice provided is infiltration.

In addition, as the action is located in the drainage basin of a terminal reservoir, the SWPPP shall include an analysis of coliform runoff.

DEP must also witness soil testing for all proposed stormwater management practices. Therefore, the applicant's representative must contact Mariyam Zachariah at (914) 749 5357 to schedule soil testing.

(Document #2, pg. 1 – 2, Cynthia Garcia, Supervisor, New York City Department of Environmental Protection, 4/16/2021)

Response 2.11-3

The draft SWPPP will be sufficiently detailed to allow for the evaluation of potential adverse water quality impacts and, if needed, the adequacy of proposed mitigation. The proposed stormwater management approach will align with permitting requirements noted in Section 18-37 and 18-39 of the Rules and Regulations for the Protection from Contamination, Degradation and Pollution of the New York City Water Supply and Its Sources (Watershed Regulations). In addition, as the proposed project would result in impervious surfaces covering more than 20% of the drainage area for which a stormwater management practice is designed, the proposed stormwater management plan will provide for stormwater runoff to be treated by two different

types of stormwater management practices in series in accordance with the Watershed Regulations.

No fecal coliform issues are anticipated for this site. The building would be connected to the airport sewer system, and no septic or leach fields will be constructed as part of this project. The stormwater management practices will be selected for their pollutant removal capabilities, including nutrients, metals, and pathogens (coliform, E.coli, and streptococci).

DEP has been invited to witness soil testing for all proposed stormwater management practices.

Comment 2.11-4

The following potentially significant adverse environmental impacts must be identified in the Final Scoping Document and addressed in the DEIS:

- a) Construction of additional impervious surface may cause additional stormwater runoff which will negatively impact habitat land including wetlands.
- b) The impacts additional stormwater runoff will have on the residential properties along Purchase Street, Tower Road and Kempner Lane.

(Document #6, pg. 1 – 2, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.11-4

Chapter 3.F of the DEIS will discuss stormwater management requirements and analyze pre- and post-development peak runoff rates from the site. The existing points of stormwater discharge and proposed on-site collection will be discussed, as well as any changes to the quality or quantity of stormwater runoff due to the project, as outlined in the scope.

Comment 2.11-5

Given the effect Climate Change and the proximity to our graveyard, we request that all analyses include the peak rates of runoff during a 500-year storm ...

(Document #9, pg. 2, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.11-5

An analysis on the 500-year storm will be conducted and any potential adverse impacts will be discussed in Chapter 3.F of the DEIS.

Comment 2.11-6

With respect to storm water, we would like to see storm water impacts on you know, the Purchase Street properties directly across the street and the Kempner Lane properties as well and any analysis of this project.

(Document #1, pg. 41, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2.11-6

Chapter 3.F of the DEIS will discuss stormwater management requirements and analyze pre- and post-development peak runoff rates from the site. The existing points of stormwater discharge and proposed on-site collection will be discussed, as outlined in the scope. Stormwater impacts associated with the project will include a discussion of impacts relating to Purchase Street, Kempner Lane, and Tower Road.

2.12. ARCHAEOLOGICAL AND HISTORICAL RESOURCES

Comment 2.12-1

Our Quaker Meeting is commenting on your project because our Meeting House property abuts the site of your proposed WJWW water filtration plant with our Meeting House (place of worship) only a few yards from the property line. It appears that your plant may be within 200 feet of our meeting house.

We want to share that Purchase Friends Meeting has had its place of worship and graveyard located at 4455 Purchase Street, Purchase, NY for almost 300 hundred years.

Our Quaker Meeting has continuously conducted worship services on our property since 1727 with only a brief interruption when our meeting house was used as a hospital for soldiers injured in the Revolutionary War.

In addition to our Quaker Meeting House, our historic graveyard contains the remains of our many of our Quaker predecessors, their slaves and other citizens of Harrison as well as soldiers who died during the Revolutionary War.

(Document #5, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 4/23/2021)

Response 2.12-1

Comment noted.

Comment 2.12-2

The following potentially significant adverse environmental impacts must be identified in the Final Scoping Document and addressed in the DEIS:

Excavation impacts on potential archeologic and historic resources. Quakers had established Purchase as community as early as 1719 and the Friend's Meeting House was erected in 1727. While Quakers are known for being part of the abolition movement some owned slaves. Enslaved people were commonly used as laborers for farming activities until 1767 when the Quakers prohibited slave ownership, paid reparations, and donated/allocated 6.5 acres for living space near what is today Buckout Road. In 1796, freed slaves founded the Stony Hill community and cemetery there. However, there is an approximately 70 year period unaccounted for where former slaves may have been buried prior to 1796. A concern has been raised regarding whether these remains are located in unmarked graves adjacent to the existing cemetery.

Given the site proposed for the water filtration plant is contingent upon and wraps around the existing historical cemetery and other property owned by the Purchase Quakers the entire area should be examined for the presence of unmarked graves. A preliminary Phase I Archeological and Historical Sui-vey was conducted to a depth of about 15 inches in limited areas. The minimal review provided in the Phase I archeological study fails to acknowledge the location of the site adjacent to the Purchase Quakers and cemetery which was established in 1727. As a result, a Phase II archeological review and more extensive excavation to a depth of at least five (5') feet is warranted to ensure that there are no historic or archeological resources that may be impacted by the Proposed Action.

(Document #6, pg. 3 - 4, Eric L. Gordon, Principal Member, Keane Beane P.C., 4/23/2021)

Response 2.12-2

The Purchase Quaker property borders the northern property line of the project site. The filtration plant will be located approximately 300 feet from the Quaker's property line, and the limit of disturbance is approximately 100 feet from the property line. The Lead Agency has conducted a Phase 1 Archeological investigation on the project site and received letters of no effect from the NYS Historic Preservation Office indicating that further study on the site is not necessary. Additional shovel testing involved in a Phase II would create ground disturbances that are not necessary. This information will be presented in the DEIS.

Comment 2.12-3

Given the historic nature of the Quaker Meeting house and the adjacent cemetery, we request that a Phase II Archeological Survey be performed.

(Document #9, pg. 2, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Historic and Archaeological Resources

The natural, cultural, historical, and architectural significance of the area require a Phase II Archeological study for the following reasons:

- Purchase Street, referred to as Middle Street in a 1771 public-property record, was assigned NYS 120 as part of the 1930 renumbering of state highways in New York. Its beginnings can be traced back approximately 10,000 years as a Siwanoy Indian path connecting the Long Island Sound that provided clams, lobsters, striped bass, flounder, and bluefish to a source of fresh water at Rye Lake. At present, this tree lined, two-lane road contains a myriad historic resources that are worthy of documentation and deserving of celebration and preservation;
- An indigenous footpath, for centuries likely not much wider than five feet across, would become adapted by incoming European settlers and known as Purchase Street. The old stone walls that are still standing along much of Purchase Street provide evidence of the labor involved in clearing the land built by our European ancestors;
- According to a pamphlet titled “Purchase Monthly Meeting of the Religious Order of Friends” the Quakers were the first settlers in Purchase, as early as 1719. In 1727, the Quakers built their first Meeting House at the most northern end of Purchase Street, on the site just below Rye Lake, where the Friends of Purchase still meet today;
- While Purchase Quakers are known for being part of the abolition movement some owned slaves until 1767 when the Friends prohibited slave ownership, paid reparations, and donated/allocated 6.5 acres as living space for former slaves near what is today Buckout Road. In 1796, freed slaves founded the Stony Hill community and cemetery in this location. That leaves an approximately 70 year period of time unaccounted for . Questions remain with respect to where African Americans were buried for prior to 1796? Do they lie in unmarked graves adjacent to the existing cemetery on Purchase Street?;
- In 1778, the Meeting House acted as a makeshift hospital for colonial troops injured in the Battle of White Plains. Buried in the cemetery near the meeting house is Cornelius Oakley, who although a Quaker, served as George Washington’s scout, along with the remains of patriot fighters as well as British soldiers;
- In the early 1800’s the Purchase Quakers established an elementary school for both its member’s and the children of other Purchase residents just south of the Meeting House, which today is a private home for the caretaker. The school preceded both a 1795 NYS Assembly bill entitled “An act for the Encouragement of Schools,” and the mandatory education laws for primary schools inaugurated in 1825; and

- In the 1850's and at least ten years before the outbreak of the Civil War, they had already organized an illegal underground railroad to help former slaves escape. They provided cover and assistance for these runaway slaves on their way to Canada.

The State Environmental Quality Review Act ("SEQRA"), requires the scoping document to identify "the extent and quality of information needed for the preparer to adequately address each impact, including an identification of relevant existing information, and required new information, including the required methodology(ies) for obtaining new information;" (6 N.Y.C.R.R. § 617.8(f)). Given the historical, cultural, and archeological significance of this area the final scoping document should require a survey of on-site historical resources by a qualified architectural historian to determine if any are valuable historic resources eligible for listing on the National Register of Historic Places. In addition, a Phase II archaeological survey should be prepared to determine the sensitivity of the site with respect to archaeological resources and whether further detailed studies may be required. These studies should be coordinated with the New York State Office of Parks, Recreation and Historic Preservation.

(Document #11, pg. 2-4, Anne Gold, Executive Director, Purchase Environmental Protective Association, 5/10/2021)

Response 2.12-3

The Lead Agency conducted a Phase 1 Archeological investigation prepared by a team of cultural resource specialists and received letters of no effect from the NYS Historic Preservation Office indicating that further study on the site is not necessary. Additional shovel testing involved in a Phase II would create ground disturbances that are not necessary. All studies and correspondence from the NYS Historic Preservation Office will be provided in an Appendix in the DEIS.

Comment 2.12-4

With respect to archeological and historical resources. As the prior speaker said, the Friends of -- the Friends of, I believe it is the Quaker meeting house, has been there for a substantially long time. There was a mention of a burial ground for civil war soldiers.

In reviewing the phase one archeological that was done, it appears that the -- there was only excavations of four inches and we would ask that if there is any -- you know, that the draft scope include at least a phase two archeological that does substantially more examination of the areas that are gonna be impacted and potential impacts on you know, potentially very valuable archeological sites.

You know, I understand New York State Department of Parks has issued an opinion, but I think given the location of this site, it is very important to do the phase two and do further studies that have a -- take a deeper dive into the archeological and historical resources in this area and

whether that's -- you know, the location so close to this meeting house -- the Friends meeting house should disqualify this site.

So that's -- we would ask that is part of the scope that would include phase two of the archeological analysis with you know larger excavations

(Document #1, pg. 42-43, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2.12-4

The Lead Agency has conducted a Phase 1 Archeological investigation on the project site and received letters of no effect from the NYS Historic Preservation Office indicating that further study on the site is not necessary. Additional shovel testing involved in a Phase II would create ground disturbances that are not necessary.

2.13. PUBLIC HEALTH

Comment 2.13-1

Ensuring water quality in the Kensico Reservoir is of the utmost concern because it is a terminal reservoir -- the last stop before the water is distributed to consumers. Kensico Reservoir water is unfiltered and receives limited treatment (*e.g.*, chlorination and UV disinfection) before it reaches the taps of consumers. The Project site lies well under the "sixty-day travel time" of the Kensico Reservoir, which is generally viewed as the lifespan for many disease-causing microbes in fresh water, such as *Giardia lamblia* and *Cryptosporidium*. This shortened travel time limits the opportunities for pollutants to settle out, become assimilated by plants and animals, or otherwise become attenuated.

Development close to the Kensico Reservoir is expected to increase discharges of polluted stormwater. According to EPA, land development "can result in both short- and long- term adverse impacts to water quality in lakes, rivers and streams within the affected watershed by increasing the load of various pollutants in receiving water bodies, including sediments, metals, organic compounds, pathogens, and nutrients."² Turbidity facilitates the transportation of pollutants, including metals, organic compounds, and pathogens. It can also shelter pathogens that pose risks to public health from exposure to attack by chlorine, a disinfectant routinely used for Kensico Reservoir water to protect public health. These include *Giardia lamblia*, *cryptosporidium*, and *E. coli* 0157:H7, all which can cause serious illness or death, especially among people who are very young, or very old, and people with compromised immune systems.³ In addition, the organic particles that contribute to turbidity can also combine with chlorine to create disinfection by-products which may increase the risk of cancer or early term miscarriage for people drinking the water.⁴

One very important method for protecting the watershed of an unfiltered water supply system is the ownership and preservation of land in its natural undeveloped state. The land acts as a sponge, absorbing and filtering stormwater pollutants before they reach the Reservoir. Here, the City holds only 34% of the land within the Kensico Watershed. This percentage is much less than that of watersheds in other cities that operate unfiltered drinking water supply systems: Boston owns and preserves 75% of its watershed, Portland, Oregon 100%, San Francisco 88%, and Seattle 99.6%.

Pollution of the Kensico Reservoir could threaten the City's ability to maintain filtration avoidance, which would require it to build a filtration plant for its distribution system. The plant would entail capital expenditures of over \$10 billion and annual operation and maintenance costs exceeding \$100 million. Under the federal Safe Drinking Water Act, 42 U.S.C. § 300f, et seq. (SDWA), EPA promulgated the Surface Water Treatment Rule, which requires the City's public drinking-water system to satisfy water quality standards, either by installing a filtration system or by meeting criteria, including a "watershed control program," to protect the quality of the water in the absence of filtration. See 40 C.F.R. §§ 141.70, 141.71.

Under the SDWA, the City's Kensico water must comply with water quality standards for turbidity and pathogens. EPA limits raw water turbidity at the intake to the distribution system in the Reservoir. Turbidity at this location in excess of 5 nephelometric turbidity units is not allowed. See 40 CFR § 141.71(a)(2). In addition, because of the health risks associated with pathogens in a drinking water supply, EPA requires that the City's unfiltered water system meet strict requirements "ensuring that the system is not a source of a waterborne disease outbreak." 40 C.F.R. § 141.71.

(Document #3, Philip Bein, Watershed Inspector General; Charles Silver, Ph.D., Watershed Inspector General Scientist; Claiborne Walthall, Assistant Attorney General; Environmental Protection Bureau, Office of the New York Attorney General, 4/22/2021)

Response 2.13-1

The Lead Agency has proposed to undertake the Proposed Action to comply with State and Federal regulations to protect public health, as outlined in Part A of the Scope. Chapter 2.B, Project Background, Need, Objectives and Benefits of the DEIS will also explain the public health benefits and regulatory requirements of the Proposed Action to filter pollutants from drinking water. In addition, Chapter 3.N Public Health, of the DEIS will discuss the current drinking water requirements, and the impacts of implementing the Proposed Action on the quality of drinking water. Finally, Chapter 3.F of the DEIS will discuss stormwater management and a Stormwater Pollution Prevention Plan consistent with NYS DEC and NYC DEP requirements will be prepared.

Comment 2.13-2

The DEIS must include the results of any Phase I environmental site assessment of the proposed parcel and based on any concerns identified on the property, include, as necessary, the results of any Phase II assessment.

(Document #2, pg. 2, Cynthia Garcia, Supervisor, SEQRA Coordination Section, 4/16/2021)

Response 2.13-2

Chapter 3.N of the DEIS will discuss the potential for public health impacts, including the results of the Phase I Environmental Site Assessment and any methods of abatement if required, as outlined in the Scope. The Phase I studies and testing results will be provided in an Appendix in the DEIS.

2.14. HAZARDOUS WASTE**Comment 2.14-1**

Potential impacts associated with hazardous waste to the wetlands habitat and residential properties along Purchase Street, Tower Road and Kempner Lane within close proximity to the site. As you are aware, the County is currently studying whether there are any contaminants to the ground water at the nearby airport. The Final Scoping Document should include an analysis of contamination to the ground water at the proposed site.

(Document #6, Pg. 4, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.14-1

The DEIS will include an examination of hazardous substances on site based on a Phase I Environmental Site Assessment and additional groundwater and soil testing that was undertaken. If required, the DEIS will describe required methods of abatement that would occur prior to or during the commencement of construction activities, as outlined in Chapter 3.N, Public Health, of the Scope.

Comment 2.14-2

The topic of hazardous materials and whether contaminated materials may be present on-site and the possibility of the migration of contaminated groundwater from the Westchester County Airport the site of the water filtration plant has occurred must be examined and should be included in the Final Scoping Document.

(Document #6, Pg. 5, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.14-2

The DEIS will include an examination of hazardous substances on site through a Phase I Environmental Site Assessment and additional soil and groundwater testing that was undertaken on the project site. The DEIS will describe required methods of abatement, if required, that would occur prior to or during the commencement of construction activities, as outlined in Chapter 3.N, Public Health of the Scope.

Comment 2.14-3

We are concerned about the impact of the chemicals used in the filtration plant will be on our meeting property as well as the noise from the large trucks that will be used for their transportation. The size of these trucks may range from 50 to 70 feet in length. Include the types of chemicals being delivered to the site, the types of chemical waste being removed from the site; include the size of the trucks making deliveries of chemicals and removing of waste.

(Document #9, pg. 4, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.14-3

Truck traffic will be discussed in Chapter 3.K as outlined in the Scope. Noise from truck and construction traffic will be discussed in Chapter 3.L, Noise and 3.O, Construction, of the DEIS as outlined in the Scope. Chapter 3.N.2, Public Health, of the Scope has been revised to include a discussion of any chemicals and hazardous materials that may be required for plant operations, including methods of storage and disposal.

Comment 2.14-4

Solid waste or waste. Again, in addition to the hazardous waste of you know any construction on-site I think there needs to be a discussion on hazardous waste that any potential chemicals hazardous waste being brought in that used as part of the treatment processes, if any, that should be included in the scoping document, in the final scoping document as well.

(Document #1, pg. 40-41, Eric Gordon, Transcript of Public Scoping Session 4/13/2021)

Response 2.14-4

Solid waste will be discussed in Chapter 3.D of the DEIS as outlined in the Scope, including on-site storage and removal of waste. Chapter 3.N.2, Public Health, of the Scope has been revised to include a discussion of any chemicals and hazardous materials that may be required for plant operations, including methods of storage and disposal.

Comment 2.14-5

Given the proximity to the airport, the existence of PFOS, PFOA, and PFAS concentrations above the USEPA recommended values at the airport and that two Recognized Environmental Conditions (REC), an Historic Recognized Environmental Condition (HREC), and two Business Environmental Risks (BER) were identified on or near the airport property, we request a Phase II Environmental Site Assessment.

(Document #9, pg. 2, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.14-5

A Phase I Environmental Site Assessment has been conducted along with additional soil and groundwater sampling. The results, including any PFOS, PFOA and PFAS detected on site, will be discussed in the DEIS, as outlined in Chapter 3.N, Public Health of the Scope.

2.15. CONSTRUCTION

Comment 2.15-1

Blasting impacts on properties along Purchase Street, Tower Road and Kempner Lane within proximity to the site.

(Document #6, pg. 3, Eric L. Gordon, Keane Beane P.C., 4/23/2021)

Response 2.15-1

Chapter 3.O, Construction, of the DEIS will discuss proposed techniques for rock removal should it become necessary and potential impacts to adjacent properties that could result from rock removal, as outlined in the Scope.

Comment 2.15-2

Disruption during construction: It appears that the construction process will be lengthy and noisy; We are concerned about the disruption this may cause for our caretaker and other activities at our meeting house; Provide the time period of actual construction on site; Set forth the dates that tree removal, site grading and building construction will begin and end; And set forth the anticipated length of time for each stage of construction.

(Document #9, pg. 3 - 4, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.15-2

The construction schedule and phasing plan will be described in Chapter 3.O of the DEIS as outlined in the Scope. The DEIS will assess the potential for construction impacts with respect to noise, tree removal and changes to site grades.

Comment 2.15-3

Disposal of Excavated Fill: A substantial part of the plant will be constructed below ground level; Include the volume of fill to be excavated; Include plans for disposal of excavated fill; Consider using excavated fill to build a berm to lessen the visual impact of the plant.

(Document #9, pg. 3 - 4, Peter Close, Trustee on behalf of Lynne Murray, Clerk, Purchase Meeting Trustees, 5/10/2021)

Response 2.15-3

Chapter 3.O, Construction, of the DEIS will discuss impacts to adjacent land uses associated with construction staging and management of fill export and import, as outlined in the Scope. A visual impact analysis will be undertaken, and Chapter B. Community Character and Visual Impacts, of the DEIS will discuss mitigation measures. It is anticipated that physical earth work, such as creating a berm, will not be needed to lessen the visual impact of the plant and using the existing landscaping augmented by additional plantings would mitigate the impacts. This information will be detailed in the DEIS.

Comment 2.15-4

With respect to construction and you know locating the plant, I know you've located much of plant underground, but you know, what are the impacts during the excavation, is there gonna be blasting, how much blasting, how this is gonna affect the neighboring properties, you know. Certainly, we favor putting more of the plant in a less visible location, but you know, also concerns about how this is going to be done and the construction impacts and how long construction is gonna take and you know, we know that's in the scope but to make sure that's fully analyzed.

(Document #1, pg. 43, Eric Gordon, Transcript of Public Scoping Session, 4/13/2021)

Response 2.15-4

Blasting is not anticipated as part of the project. The proposed technique for rock removal will be discussed in the DEIS in Chapter 3.O, Construction.

2.16. WETLANDS, WATERBODIES, WATERCOURSES, AND FLOODPLAINS

Comment 2.16-1

Section I of the Draft Scope calls for description of anticipated impacts to wetlands and waterbodies and proposed mitigation for all identified significant adverse impacts. The Draft Scope identifies approximately two acres of wetlands on the Project site, including an unnamed and unclassified stream that appears to discharge to Rye Lake/Kensico Reservoir. See Draft Scope, at 6; Maps 1 & 3. During construction, this stream has the potential to convey sediment and other contaminants mobilized by soil disturbance to Rye Lake. After construction is completed, the increased area of impervious surfaces proposed for the Project have the potential to increase stormwater runoff velocity, also increasing levels of Total Suspended Solids (TSS) in the stream, which may impact Rye Lake/Kensico Reservoir. The potential adverse impacts during and after construction may be exacerbated if on-site wetlands are disturbed or degraded.

The WIG believes that the Project should result in no net increase of TSS to this unnamed stream and Rye Lake/Kensico Reservoir. This should be documented in a pollutant loading analysis addressing TSS (and fecal coliforms as well). Therefore, the WIG recommends that the DEIS fully analyze the potential adverse impacts to water quality in Rye Lake/Kensico Reservoir related to the on-site wetlands and streams, and the increased areas of impervious surfaces on the site. If the DEIS identifies significant adverse impacts, the DEIS should identify appropriate mitigation measures to avoid any net increase in TSS loading during construction or operation of the Project.

(Document #3, Philip Bein, Watershed Inspector General; Charles Silver, Ph.D., Watershed Inspector General Scientist; Claiborne Walthall, Assistant Attorney General; Environmental Protection Bureau, Office of the New York Attorney General, 4/22/2021)

Response 2.16-1

Due to the site's location in the Rye Lake/Kensico Reservoir watershed, the site is being designed in accordance with water quality requirements in Subchapter C of NYCDEP's Watershed Regulations as well as the New York State Stormwater Management Design Manual (NYS SMDM). As such, the site is required to implement Stormwater Management Practices (SMPs) to treat the one-year 24-hour rainfall event, and this is reflected in the Water Quality Volume (WQv) and Runoff Reduction Volume (RRv) calculations. All approved SMPs in the NYS SMDM were selected by NYSDEC based on their ability to provide adequate TSS removal, and the project SMPs are being designed in accordance with the manual to ensure proper TSS removal. No fecal coliform issues are anticipated for this site because the building would be connected to the airport sewer system, and no septic or leach fields will be constructed as part of this project.

Comment 2.16-2

Anticipated Impacts should be quantified and broken out to temporary and permanent impacts to both wetlands and adjacent areas. All wetlands should be assessed for impact regardless of their regulatory status.

The discussion of water features must note the project's location in the Kensico Reservoir basin, the critical nature of Kensico Reservoir and its importance to NYC's drinking water supply system, must identify any potential impacts to the Kensico Reservoir, and include necessary mitigation, as Kensico Reservoir is a terminal reservoir located within the 60-day travel time to water supply intakes.

The DEIS should include a discussion relative to disturbances proposed in wetlands and buffer areas for the construction of a parking area and demonstrate how those adverse impacts will be mitigated and/or avoided.

The DEIS should include a detailed set of site plans that depict all proposed improvements in relation to sensitive environmental features on the project site including watercourses and wetlands. It is strongly recommended that a site visit be conducted with DEP staff early in the planning process in order to delineate the nature and extent of watercourse(s) on the project site. Again, the applicant's representative may contact Mariyam Zachariah at (914) 749-5357 in order to schedule a site visit.

The DEIS must identify and assess any altered drainage patterns and the potential adverse impacts that increased, or, in some cases, decreased runoff amounts would pose to wetlands and streams. Again, DEP must validate the watercourse(s) depicted on the circulated maps that were included in the draft scope as the surface water features are not consistent with DEP's GIS mapping. Note that the Watershed Regulations include strict limiting distances from watercourses, reservoir stems and reservoirs to certain activities (e.g., impervious surfaces and petroleum bulk storage) which may significantly impact the layout an extent of this action.

DEP recommends that the applicant use only native, non-invasive species for plantings associated SWPPP practices and other landscaping or wetland mitigation plans. The DEIS should include a preliminary list of species that will be used for any proposed mitigation plans.

(Document #2, pg. 2 – 3, Cynthia Garcia, Supervisor, New York City Department of Environmental Protection, 4/16/2021)

Response 2.16-2

Detailed site plans will be included in the DEIS as an Appendix and all required site visits will be coordinated with the NYC DEP, including watercourse validation.

The SWPPP and site plans will be prepared in accordance with NYS DEC and NYC DEP regulations. Parking lots and other impervious surfaces will be incorporated into the stormwater analysis.

Chapter 3.F of the DEIS will discuss stormwater impacts, including erosion and sediment control measures and analyze pre- and post-development peak runoff rates from the site. The existing points of stormwater discharge and proposed on-site collection will be discussed, as outlined in the Scope. A Stormwater Pollution Prevention Plan will be drafted.

The DEIS will include a landscape plan and will include a preliminary list of plant species. This information will be provided in Chapter H, Vegetation and Wildlife.

Comment 2.16-3

Next is as far as the wetland impacts. I think it is important that you analyze the wetland impacts by studying all the alternatives. I mean, my understanding is one of the -- again, the reasons why some of the alternatives weren't selected was because of wetlands, but I think there needs to be an analysis on how wetlands could be addressed and what would be the most preferable site from a wetlands prospective, and that should be part of the scoping document as well. Is the study of all three sites with respect to the wetlands issues.

(Document #1, pg. 41, Eric Gordon, Transcript of Public Scoping Session 4/13/2021)

Response 2.16-3

Chapter 3.F of the DEIS will discuss stormwater impacts, including erosion and sediment control measures and analyze pre- and post-development peak runoff rates from the site. The existing points of stormwater discharge and proposed on-site collection will be discussed, as outlined in the scope. A Stormwater Pollution Prevention Plan will be prepared.

Alternatives 2, 5, 6, 7, and 8, as outlined in the Scope will discuss alternative site locations and, where relevant, approximate wetlands disturbances for comparison with the Proposed Action.

2.17. ALTERNATIVES

Comment 2.17-1

The DEIS should include a project alternative of reduced scope and reduced environmental impact that considers alternative site layouts, limited site disturbance, limited and disconnected impervious surfaces, use of stormwater green infrastructure practices, and stormwater runoff directed to infiltration practices where feasible...

The alternatives should include a discussion of siting the facility outside of the Kensico Reservoir basin (e.g. existing WJWW-owned parcel or other parcel). To the extent possible, the DEIS should also include analysis of the feasibility of siting, at a minimum, the stormwater outfalls outside the Kensico Reservoir basin particularly given the proximity of the chosen parcel to the watershed boundary.

(Document #2, pg. 2 – 3, Cynthia Garcia, Supervisor, New York City Department of Environmental Protection, 4/16/2021)

Response 2.17-1

Chapter 2 of the DEIS will discuss the Proposed Action in terms of the site plan layout and materials. Chapter 3.A, Land Use, Zoning and Public Policy will discuss the Proposed Action in terms of its consistency with the surrounding land use, zoning code, and local planning documents.

Alternatives 2 and additional alternatives 5, 6, 7, and 8 will all discuss alternative site locations, and will weigh potential impacts for comparison with the Proposed Action. Specifically Alternative 2 will discuss locating the project on the WJWW-owned site outside of the Kensico Reservoir Basin.

Comment 2.17-2

The following reasonable alternatives and descriptions of the impacts addressed must be identified in the Final Scoping Document and addressed in the DEIS:

- Reconsider the potential alternative site on the property behind the proposed Sylvan subdivision and how it would result in fewer impacts to the residents based on its location further from Purchase Street and any existing residences. Provide an analysis of why this site was rejected when it was selected as the location for the water filtration plant in 2007-2007 when the Town of Harrison Planning Board acted as Lead Agency with respect to this project. Consider whether the consent of the owner of the Sylvan subdivision would impact the consideration of this site as an alternative.
- Consider the potential alternative site on the Westchester Airport property down Tower Road further from Purchase Street. Provide an analysis of why this alternative site was rejected.
- Consider alternative access to the water filtration plant from Tower Road, rather than providing access directly from Purchase Street that will adversely impact many residences on Purchase Street and Kempner Lane.

- Consider the alternative of constructing a pipeline connecting to the New York City Shaft 20 in Yonkers and the potential adverse impacts that would be mitigated based on this alternative.
- Consider Alternative water filtration or water purification technologies that would not require construction of a water filtration plant that would address the June 9, 2004 Judgment and Order and USEPA Administrative Order.
- Provide alternative plant construction designs and assess the potential impacts that would be mitigated by these alternative plant construction designs.

(Document #6, Pg. 7, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.17-2

The above comment references Shaft 20 in Yonkers; however, Shaft 20 is located in Greenburgh.

The following alternatives have been added to the Scope to address the above comments:

- Alternative 5: The use of Tower Road as an alternative entrance to the proposed site will be discussed.
- Alternative 6: Alternative Site Plan Tower Road (Discuss locating the plant along the north side of Tower Road on property currently owned by Westchester County.)
- Alternative 9: Shaft 20 Alternative (Discuss the construction of a pipeline connecting to the New York City Shaft 20 in Greenburgh)

The following alternatives were already included in the Scope and address the above comments:

- Alternative 3: Alternative filtration technology (Discuss the potential of meeting the EPA Administrative Order (Index No. SDWA-02-2020-8001) dated November 26, 2019, Judgment and Order of New York State Supreme Court (Index No. 13364-99, Justice Louis A. Barone) dated June 9, 2004, and current federal drinking water standards through another technology other than what is proposed in the Proposed Action).
- Alternative 4: Alternative façade treatments for the filtration plant will be presented and discussed.

Comment 2.17-3

Consider combining the WJWW UV Plant and proposed water filtration plant in a single structure on the site of the proposed location for the UV Plant. WJWW is currently in the process of obtaining approvals from the Town of Harrison Planning Board for the UV Plant on property that WJWW leases from the NYCDEP where a pumping station is currently located in a

historically significant building. The UV Plant is to be housed in a new building, and will include, among other things, associated new piping and an additional generator. The construction of the UV Plant should be placed on hold while the WJWW, as Lead Agency, considers if the new building housing the UV Plant can be expanded to house both the UV Plant and water filtration plant systems in a single structure on a single site, instead of dispersing them on two separate sites. Combining the two systems in one structure on the property where the existing UV Plant is currently expected to be located will greatly reduce potential adverse environmental impacts to the residential area near the proposed water filtration plant location, and will minimize the impacts to the Purchase Quakers. Impacts on the parcel where the UV Plant is proposed will be minimal because this is an existing location where disturbance is already occurring.

(Document #8, pg. 2, Eric L. Gordon, Keane and Beane P.C., 5/7/2021)

Response 2.17-3

Alternative 7, Alternative Site Plan at Rye Lake Pump Station, has been added to the Scope.

Comment 2.17-4

Another potential alternative site that the WJWW should consider is identified on the Town of Harrison Tax Map as SBL 0097.-1 and is owned either by the City of New York or the New York State Department of Transportation. Printouts of this parcel from the Westchester County GIS are submitted herewith. The parcel currently has a large area that houses trucks and other equipment that we were advised are owned by a private company that subcontracts with the New York State Department of Transportation to perform electrical and other work on I-684 and possibly other areas in Westchester County. It is believed that these trucks and other equipment on this parcel contribute to Rye Lake contamination and should be removed. This parcel is a preferable site to the current proposed location for the water filtration plant on the airport property because there is already a large area of disturbance on this site, and because it is not in close proximity to any residences or other known potentially historic sites. At the very least, this parcel should be included for study in the DEIS Final Scoping Document as a potential alternative location.

(Document #8, pg. 2, Eric L. Gordon, Keane and Beane P.C., 5/7/2021)

Response 2.17-4

Alternative 8 has been added to the Scope to address locating the plant on Harrison Tax Map as SBL 0097.-1, currently owned by New York City.

Comment 2.17-5

SEQRA requires “a description and evaluation of the range of reasonable alternatives to the action that are feasible, considering the objectives and capabilities of the project sponsor” (6 N.Y.C.R.R. §617.9(b)). While an applicant is not required to consider sites it does not own or have the option to purchase, the final scoping document must include the consideration of other properties owned/controlled by WJWW and determine if any of these properties could be used to meet the applicant’s objectives for the project. If viable alternative sites are available, they should be advanced for full evaluation in DEIS. There is at least one alternative site that is owned by WJWW that was previously considered as a viable location for a water filtration plant in or around 2007-2008.

(Document #10, pg. 4, Anne Gold, Executive Director, Purchase Environmental Protective Association, 5/10/2021)

Response 2.17-5

Alternative 2 of the DEIS will discuss locating the plant on the WJWW property that would be part of the land swap associated with the Proposed Action. Alternative 6 has been added to the scope, which includes a discussion of an alternative site plan along the north side of Tower Road.

Comment 2.17-6

The second thing I wanted to talk about sort of out of order is the alternatives. That's the other sort of part of SEQRA is consideration of alternative sites, you know. Initially when this project had been presented our understanding was that it was gonna go down Tower Road when it was going to the airport property that there was gonna be there is an area down Tower Road that you know, it's another large area undeveloped area on the airport property that you could set this plant back substantially further from Purchase Street, have many fewer impacts on many of the properties on Purchase Street and Kempner Lane, without having to create a new separate entrance onto Purchase Street, which seems to be the current alternative that's been -- or the current Proposed Action that has been presented.

So certainly, with respect to alternatives I would hope that you would study that other alternative. I know there are wetland issues, I believe there are wetland issues with both sited, but you know that would be a much preferable alternative. You know, again, I don't know why that was not -- why that was eliminated, but you know that should be certainly studied as part of the scope as that alternative area of the airport property, you know.

I know you said you are going to study the area, the Joint Water Works property, which is now set out for exchange and you know. My clients in discussing this with them and having an understanding of it and sort of if that -- the alternative site in the airport property is not

something that is deemed feasible or appropriate, certainly given sort of a lesser of two evils type of situation, if the plant has to be built you know, my client is you know, open to consideration of that with Westchester Joint Water Work site behind the subdivision that is there. There are wetlands again that have to be crossed, but that area again is setback much further from any residences and it would have many fewer impacts on any potential residents, other than my client's potential subdivision which isn't developed yet, but you know, again that alternative we think should be given substantial consideration over what has been presented here.

(Document #1, pg. 33 -35, Eric Gordon, Transcript of Scoping Session, 4/13/2021)

Response 2.17-6

Alternatives have been added to the DEIS scope which will discuss access to the current proposed site plan via Tower Road (Alternative 5) and an alternative site plan on Westchester County property north of Tower Road (Alternative 6).

Alternative 2 presents the alternative site plan on the WJWW site that would be part of the land swap in the Proposed Action.

Comment 2.17-7

And then again, last but not least we would really ask that with respect to alternatives that these be properly analyzed, that the additional alternative proposed down Tower Road be analyzed before you know, going too much further down the path of finalizing the location for this project because you know, it's my client's opinion that this isn't the best location for this project given how things have shaped up over the years and where things stand.

(Document #1, pg. 33 -35, Eric Gordon, Transcript of Scoping Session, 4/13/2021)

Response 2.17-7

Alternatives have been added to the DEIS scope that will discuss access to the current proposed site plan via Tower Road (Alternative 5) and an alternative site plan north of Tower Road (Alternative 6).

Comment 2.17-8

Getting into further alternatives in reading the scoping document, the introduction there was a very brief discussion of sort of regional water utilities that were sort of pursued options and there was the viability of alternative to filtration of Rye Law water consisting of construction of a pipe line for conveyance of treated water from New York City shaft 20 in Yonkers. And that - there is a line in here that due to its exorbitant cost of a 175 million was discounted, and I certainly appreciate that, but there should be a substantial discussion of those other potential

alternatives of satisfying the EPA requirement and the other order that is the -- the Joint Water Works is subject to, and I think there should be a much more detailed explanation of why that cost is 175 million, you know, how it was eliminated, why the regional project -- you know, the regional alternatives or options were eliminated and not just leave it as a faded complete that we need a plant, especially given the substantial cost of this plant.

(Document #1, pg. 35-36, Eric Gordon, Transcript of Public Scoping Session 4/13/2021)

Response 2.17-8

Shaft 20 is located in Greenburgh and not Yonkers. Alternative 9 has been added to the scope to discuss the Shaft 20 alternative from Greenburgh, NY.

2.18. MISCELLANEOUS

Comment 2.18-1

The DEIS Draft Scope fails to provide any information on the extent and quality of information needed to adequately address identified impacts. 6 NYCRR § 617.8(e)(3).

The Final Scoping Document should include a reference to available scientific literature and relevant data pertinent to the identified impacts. (See The SEQRA Handbook, Fourth Edition, 2020, p. 104.) The Final Scoping Document should identify existing and relevant data that will be used to address identified impacts. The DEIS Draft Scope fails to include available scientific literature and relevant data and information concerning the wetlands areas, stormwater impacts, and economic impacts which should be included and studied in the DEIS.

(Document #6, Pg. 6, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.18-1

The Scope outlines the information and data on hand and that will be collected in each of the technical areas of analysis, in compliance with the requirements of the SEQRA regulations.

Comment 2.18-2

The DEIS Draft Scope fails to identify specific mitigation measures. 6 NYCRR § 617.8(e)(4).

The DEIS Draft Scope simply states at the bottom of each subheading of each Chapter "Mitigation Measures Discuss and evaluate mitigations measures for all identified significant adverse impacts". This does not meet the minimum requirements set forth under SEQRA for scoping, which requires a list of potential mitigation measures to be provided in the scoping document and an explicit requirement to include and address additional mitigation measures which may be identified during EIS studies and analyses. (See The SEQRA Handbook, Fourth

Edition, 2020, p. 104.) Specific mitigation measures to be explored in the DEIS must be identified and listed in the Final Scoping Document.

(Document #6, Pg. 6, Eric L. Gordon, Keane and Beane P.C., 4/23/2021)

Response 2.18-2

The Scope identifies the potential mitigation measures identified at the time of scoping, prior to preparation of the DEIS. These include the anticipated need to develop a Stormwater Pollution Prevention Plan (SWPPP) and the requirement that the contractor develop a dust mitigation plan as part of the construction contract. If the DEIS identifies significant adverse impacts with respect to the Proposed Action, the DEIS will seek to identify feasible measures to mitigate such impacts, as required by the SEQRA. Such measures may include the use of directional lighting, screening, and the use of photovoltaic panels to reduce the net energy consumption of the filtration plant's operation.