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Memorandum

To: Village of Mamaroneck ZBA
From: AKRF, Inc. (A. Ley, A. Auld, B. Zieroff)
Date: November 5, 2020
Re: 416 Waverly Avenue
cc: William Long

A. INTRODUCTION

AKRF, Inc. has initiated its review of the revised preliminary Draft Environmental Impact Statement (DEIS), received October 14, 2020, for the Mamaroneck Self-Storage Building Addition located at 416 Waverly Avenue in the Village of Mamaroneck, NY (Tax Map #8-111-29-42). This document has been submitted to the Zoning Board of Appeals (ZBA) for a review of its completeness according to the adopted Scoping Document, dated September 5, 2019. The purpose of this review is to determine whether the DEIS follows the Scoping Document and whether relevant information is presented and analyzed in a complete and understandable format. This is the second round of completeness review. A determination of completeness does not necessarily indicate that the ZBA concurs with all of the analyses—there may be areas of disagreement or differences in the interpretation of technical issues. The ZBA, the community, and interested and involved agencies will have the opportunity to provide additional comment on substantive issues, conclusions reached and proposed mitigation measures during the comment period, which follows the completeness determination. However, to determine the document complete, the ZBA should concur that the facts presented in the DEIS are accurate and clearly described, and the methodologies consistent with those detailed in the Scoping Document or industry standard.

At its February 6, 2020 meeting, the ZBA declared the DEIS incomplete and required its revision subject to the comments raised at the February 6, 2020 meeting as memorialized in a written memorandum dated February 7, 2020, the AKRF memorandum dated January 17, 2020, and the Kellard Sessions memorandum dated February 4, 2020.

The following memorandum recites AKRF's January 17, 2020 comments in *italics*, new and follow-up comments are presented in **bold**. We anticipate discussing the ZBA's previous comments, as summarized in the February 7, 2020 memorandum, at the November 5 and November 16, 2020 meetings.

B. AKRF'S COMPLETENESS REVIEW COMMENTS

COVER SHEET AND GENERAL INFORMATION

1. *A placeholder for the website/URL where SEQRA documents will be located should be added to the cover sheet.*

This comment has not been addressed.

2. *A placeholder for the deadline by which comments on the DEIS are due should be added to the cover sheet.*

This comment has not been addressed.

3. **New Comment: A Phase II Environmental Site Assessment was completed and is included in the Appendix. However, it is not listed in the Table of Contents. This should be corrected.**

CHAPTER I EXECUTIVE SUMMARY

4. *Page I-2 (and first reference in Chapter II), include a footnote that defines "net zero." Also, please be consistent with either "net zero" or "net-zero" throughout the document.*

A footnote has been added. However, there are still some inconsistencies with "net-zero."

5. *Page I-2 (and first reference in Chapter II), please refer the reader to Appendix L for more information on the "Community Solar Program."*

Comment addressed.

6. *Section I.5, "Alternatives" should include a brief description (two to three sentences) of each of the alternatives to the Proposed Action.*

Comment addressed.

7. *Table I-3 should include each of the technical areas analyzed in the DEIS.*

This comment has not been addressed, the technical areas are not included in the table.

CHAPTER II DESCRIPTION OF THE PROPOSED ACTION

8. *Table I-1 indicates that the Flood Plain Development Permit would be issued by the Building & Engineering Department, but page II-2 indicates that the Planning Board would issue this permit. These two sections should be reconciled.*

Comment addressed

9. *Figures II-1 and II-2 have a large black box that partially covers the title and figure number. This appears to be a printing error as the PDF does not have the same box.*

AKRF has a digital copy of this version. This should be checked in the hard copies.

10. *Figure II-2 should include a label or legend indicating the project site. Also, Fenimore Rd should be labeled.*

This comment has not been fully addressed; Fenimore Rd should be labeled.

11. *Figure II-3 should include street names.*

This comment has not been addressed.

12. *Page II-4 refers to the Proposed Action as a "tangible improvement." This subjective statement should be prefaced with, "In the Applicant's opinion."*

Comment addressed.

13. *Figures II-5, II-10, and II-11 were cut off in the print version, but appear whole in the pdf.*

AKRF has a digital copy of this version. This should be checked in the hard copies.

14. *Figure II-17, please include street names and label the project site and other prominent buildings for reference.*

This comment has not been addressed.

15. *Page II-13, first full paragraph, includes a number of subjective statements regarding the attractiveness of the existing and proposed self-storage buildings. These statements should be prefaced with, "In the Applicant's opinion."*

Comment addressed.

CHAPTER III REQUIRED PERMITS AND APPROVALS, INVOLVED AND INTERESTED AGENCIES

16. *Table III.-1 should be updated in accordance with comment 7 above.*

Comment addressed.

CHAPTER IV.A. LAND USE & ZONING

17. *Section IV.A.1.a, per the Scoping Document, this section should describe the generalized land use patterns and neighborhood character of the Village of Mamaroneck as a whole.*

Comment addressed.

18. *Figures IV.A-1 and IV.A-2 should include street and railroad labels. In addition, the legend should include the 'light gray' color. Please also note that the print version was cut off, but the PDF appears whole.*

This comment has not been addressed. The figures should label streets and railroads, and include a "light grey" color in the legend to denote them.

19. *Per the Scoping document Section 4.b, the existing conditions section should include a discussion of previous land use approvals for the existing storage facility, and variances and conditions of approval therefor.*

Comment addressed.

20. *Section IV.A.1.e, provide a reference to the draft 'Maker Zone' text including last revised date.*

This comment has not been addressed.

21. *Per the Scoping Document Section 4.f.i and ii, the text should include a description of existing on-site nonconformities with M-1 zoning district dimensional requirements, and existing dimensional nonconformities on nearby properties within the M-1 zoning district.*

Comment addressed.

22. *Section IV.A.1.g, per the Scoping Document, this section should include a discussion of any conditions of approval for the variances noted. If no conditions were required, the text should state as such.*

Comment addressed.

23. *Page IV.A-19, the DEIS should avoid the use of superlatives. "Will actually reduce" should be revised to state, "is projected to reduce" and refer to the traffic chapter for objective support of this statement. The first full sentence that begins "The building addition will in no way..." should be rephrased or revised to state that this conclusion is "in the Applicant's opinion".*

Comment addressed.

24. Page IV.A-19, the second to last sentence that begins, “Parking and loading space code deficiencies...” should be revised to remove prejudicial language regarding the current Zoning Code, or refer to this statement as being the Applicant’s opinion.

Comment addressed.

25. Page IV.A-20, first full sentence, insert “area” between “floor” and “variance.”

This comment has not been addressed.

26. Page IV.A-20, third paragraph should include support for the statement that, “the Mamaroneck Self-Storage facility is currently turning away customers.” This could include monthly or annual occupancy rates for the existing self-storage facility. This section should also refer to the Economic & Fiscal Analysis chapter for information on regional demand for self-storage facilities.

This comment is no longer applicable as the statement was removed.

27. As required by the Scoping Document, this chapter should analyze the Proposed Action’s consistency with each of the current land use plans and policies specified. While a description of these plans was provided under existing conditions, a complete consistency analysis is missing from the analysis of anticipated impacts of the Proposed Action.

Comment addressed.

28. As required by the Scoping Document, this chapter should analyze the project’s consistency with the proposed “Maker Zone Overlay District” and applicable use and dimensional requirements.

Comment addressed.

29. **New Comment: In several locations (pg II-4, IV.A-6, and V.-1) the DEIS refers to the existing off-street parking area for the self-storage facility as having 25 spaces. These references should be clarified to note that they are only referring the existing spaces immediately adjacent to the self-storage building, and do not reflect the total number of existing spaces on the property. As noted on page IV.A-6, the ZBA granted a parking variance in 2013 that required 52 spaces to serve the entire site, and consistent with this approval the existing conditions Figure II-5 shows 52 spaces.**

CHAPTER IV.B. NATURAL RESOURCES

30. Figures IV.B-1, -2, and -3 have a large black box that partially covers the title and figure number. This appears to be a printing error as the PDF does not have the same box.

AKRF has a digital copy of this version. This should be checked in the hard copies.

SURFACE WATER

31. The Village Engineering Consultant will provide comments on this section in regards to stormwater runoff.

AQUIFERS & GROUNDWATER

32. The Scoping Document required the identification and analysis of portions of the Project Site where construction will occur, and if groundwater will be encountered during/after construction. The construction plans indicate that excavations up to 4 feet below finished grade are needed to install the proposed foundation elements. The depth to water was reported as being as high as approximately 3 feet below existing grade. In accordance with the Scoping Document, this section should analyze whether groundwater will be encountered during the excavation work, and identify the need for construction-related dewatering.

Comment addressed.

33. *Section IV.B.2(c) does not fully address the potential impacts to groundwater during construction as required by the Scoping Document. As noted above, the construction plans indicate excavations up to 4 feet in depth, which is below the reported groundwater depth. This section should include a discussion of the potential need for dewatering, and should quantify the amount of material to be removed.*

Comment addressed.

34. *Section IV.B.2(d) should include a discussion of dewatering, or other mitigation measures required during construction if groundwater is encountered.*

Comment addressed.

GEOLOGY, SOILS & TOPOGRAPHY

35. *This section indicates the excavation of approximately 550 cubic yards of soil/fill, of which approximately 330 cubic yards would be reused as fill. The construction plans in the Excavation Work Plan (EWP) indicates a cut of 69.31 cubic yards, and a fill of 127.91 cubic yards. Please clarify the cut and fill estimation.*

Comment addressed.

36. *The Scoping Document required a discussion of potential impacts related to soil erosion. This discussion should be included in this section.*

Comment addressed.

37. *Fill is a State regulated material that includes specific handling requirements once excavated, and this section indicated that soil boring logs documented the presence of ash and slag within the fill. Measures for characterization of the fill material must be completed in accordance with State approved methods, and identify State requirements and/or limitations for the reuse of fill as on-site backfill. As required by the Scoping Document, this section should identify and analyze proposed sediment and erosion control measures, and describe any site or construction constraints anticipated as a result of the existing conditions' analysis.*

Comment addressed.

CHAPTER IV.C. HAZARDOUS MATERIALS & PUBLIC HEALTH

38. *This Chapter summarizes the Phase I Environmental Site Assessment (ESA) that was reported to be completed in accordance with the American Society of Testing and Materials (ASTM) Standard Practice E 1527-13 to identify any existing recognized environmental conditions (RECs) and/or environmental concerns. To confirm the conclusions presented in the Chapter, the full Phase I ESA report should be provided in the appendices. The Phase I ESA should include the review of Federal, State, and Local databases in accordance with minimum ASTM search radii (Radius Report). The Phase I ESA summary included in Chapter IV.C., should specify items that were identified as Recognized Environmental Conditions (RECs), Historic Recognized Environmental Conditions (HRECSs) Controlled Recognized Environmental Conditions (CRECs), and/or De Minimus Conditions, as defined by ASTM.*

A Phase I ESA report was not included in the Appendix. The Phase I ESA summary in the Revised DEIS did not include the project site history, including previous site uses, a review of Federal, State, and Local databases, or a list of Areas of Concern (AOCs). The Phase I review indicates that hazardous chemical storage and use was conducted at the site, but the uses and types of chemicals are not described. The Phase I ESA review indicates that a Tier 1 Vapor Encroachment Screening was conducted, which concluded that no vapor encroachment conditions exist on the site. There is no back up data (required as part of a Tier 1 review, including a review of federal, state, or local databases, historical uses, etc.) supporting this conclusion, which would typically be included in a Phase I ESA report.

39. *The Phase I ESA summary included in this Chapter, indicates that nearby properties, including the M. Argueso and Company, Inc. Brownfield Cleanup Program (BCP) site have not affected or impacted the Project Site. Please indicate the methods (i.e. groundwater flow direction, analytical data, and groundwater quality) used to reach this conclusion.*

The revised DEIS indicated that the M. Argueso and Company, Inc. site has not affected the project site since the sites are closed and no off-site remediation or monitoring at or near the project site was required. The NYSDEC remediation database indicated that the M. Argueso site also contained significant solvent contamination in groundwater, that the groundwater flow direction was to the northeast (toward the project site) and the northwest, and that the site is currently being monitored under a Site Management Plan. What data (monitoring well locations, groundwater flow direction, etc.) was used to conclude that the project site was not affected? If the participant in the BCP was a volunteer, then off-site remediation would not be required as part of site closure.

40. *In accordance with the Scoping Document, a Phase II ESA was required to determine whether hazardous materials are present in soil and/or fill, groundwater, or soil vapor. This Chapter indicates that a subsurface investigation was conducted by HydroEnvironmental Solutions, Inc. (HES) in April 2019. Figure IV.B-6 depicts the four soil boring locations that were drilled for the identified purpose of field screening, sample collection, and laboratory analysis. Please include a description of the subsurface investigation, the results of any laboratory analysis, and include a copy of the subsurface investigation report, if available.*

A Phase II ESA was completed as requested, and the report is included in the Appendix. The Phase II ESA report included data associated with soil and groundwater sampling and analysis, and concluded that all AOCs can be eliminated. However, without a complete Phase I ESA report and list of AOCs, this conclusion is insufficient without testing data for chlorinated solvent compounds as part of the soil and groundwater analysis, and without any soil vapor sampling.

41. *Section IV.B. Geology of the DEIS indicated ash and slag were present in shallow soil identified as fill, which can contain elevated semi volatile organic compounds (SVOCs) and metals, amongst other potential contaminants. The Phase II ESA was to include conclusions related to documented contaminants in soil, groundwater, or soil vapor, to identify any the potential for on-site exposure during soil disturbance, soil handling and soil disposal requirements, and/or the need for any mitigation measures [(i.e., sub-slab depressurization system (SSDS)] to be incorporated into building design. Please provide the environmental status of on-site media (soil, groundwater, soil vapor) as these are necessary to determine whether the measures (work zone monitoring, including action levels and response methods, and screening measures to identify contamination, soil reuse requirements, etc.) are appropriate.*

The Phase II ESA did not include solvent compounds as part of the analysis for volatile organic compounds in soil and groundwater, and it did not include soil vapor sampling.

42. *The adjacent BCP site was identified as having elevated chlorinate solvent compounds in groundwater. Please provide the means and methods used to determine that the documented contaminated groundwater at this site has not affected groundwater or soil vapor at the Project Site, including the potential for soil vapor intrusion.*

Please refer to comment #39 above.

43. *This section is incomplete without the inclusion of a Phase II ESA.*

A Phase II ESA report was included. Please refer to Comment # 40 above.

CHAPTER IV.D. FLOODING & FLOOD ZONE IMPACTS

This chapter is being reviewed by the Village's Engineering Consultant.

Please refer to the Village Engineer's comment letter.

CHAPTER IV.E. HISTORIC RESOURCES

44. *Page IV.E-2, the last paragraph should direct the reader to the letter and email in Appendix I.*

Comment addressed.

45. *The correspondence with the Office of Parks Recreation and Historic Preservation (OPRHP) only addresses review under the State Environmental Quality Review (SEQRA). However, this project will require a Stormwater Pollution Prevention Plan (SWPPP) approved by the New York State Department of Environmental Conservation (NYSDEC). As such, the Applicant should submit a new letter to the OPRHP specifically requesting a determination of potential impacts to architectural and archaeological resources in accordance with Section 106 of the National Historic Preservation Act and Section 14.09 of the New York State Parks Recreation and Historic Preservation Law. (See paragraph 2 of the October 15, 2008 letter from OPRHP).*

Comment addressed.

CHAPTER IV.F. VISUAL RESOURCES

46. *This Chapter frequently refers to the existing and proposed self-storage building as "architecturally appropriate" and "attractive." More context/justification should be provided for these statements. This discussion could include a description of the building's massing, architectural details, windows and other features to break-up blank walls, and the utilitarian nature of the building and district as a whole. This Chapter could draw further on specific recommendations of the Waverly Avenue Design Study and other Village planning documents.*

Comment addressed.

47. *Figure IV.F-1 should be revised to include street names. In addition, the print version has a large black box that partially covers the title and figure number. This appears to be a printing error as the PDF does not have the same box.*

This comment has not been addressed.

48. *Each of the viewpoints on pages IV.F-2 to IV.F-9 should include captions that describe the direction of the view and approximate intersection. Alternatively, the street names in the location box should be enlarged to be more legible.*

Comment addressed.

49. *Figure IV.F-2 should be revised to label the five existing buildings on the project site.*

This comment has not been addressed.

50. *Captions should be provided on Photographs 1 through 10.*

Comment addressed.

51. *The Applicant should caption each of the photographs (IV.F-10 to IV.F-14) to describe which buildings are being shown and from which vantage point.*

Comment addressed.

52. *Section IV.F.3a, please expand the first paragraph to include the building height and a description of the architectural style, proposed materials, and color scheme.*

Comment addressed.

53. *Figure IV.F-4 is missing the “4” in the figure title and there are two viewpoint Roman numeral 5’s. In addition, the print version is missing several arrows and location numbers.*

This comment has not been addressed.

54. *Page IV.F-17, Section c, the last sentence of this paragraph should be deleted or revised to state that it is in the Applicant’s opinion.*

This comment has not been addressed.

55. *Section IV.F.3d should further discuss the relationship of the proposed self-storage addition to the surrounding community. The discussion should focus on comparing the heights, architectural character, bulk, and scale to the surrounding area.*

Comment addressed.

56. *Figure IV.F-11 should include street names, and should call out the project site and other significant buildings for context. The Figure could include the height and square feet of the other significant buildings.*

This comment has not been addressed.

57. *Section IV.F.3e should describe the lighting levels in terms of foot-candles and compliance with § 342-18 “Exterior lighting” of the Village Code. Please provide context to the statement, “these fixtures afford an appropriate level of site lighting without excessive spill beyond the property line”.*

This comment has not been fully addressed; there is no mention of foot-candles.

58. *Figure IV.F-12 should include photo metrics.*

Comment addressed.

59. *Figure IV.F-17 is mislabeled as an “Existing Condition.”*

This comment has not been addressed.

60. *Section IV.F.3e – In cases where the Proposed Action would not be visible from a particular vantage point due to distance, topography, or vegetation, a cross section should be provided for context.*

Comment addressed.

61. *This Chapter should address the potential visibility of rooftop facilities such as solar panels, or other uses.*

Comment addressed.**CHAPTER IV.G. UTILITIES**

62. *Section IV.G.1(a) includes estimated water supply flow rates. However, flow tests, as required by the Scoping Document, were not provided. Page IV.G-3 indicates that the proposed project would reduce the peak flow rate from existing conditions, and asserts that no flow test is needed. The requirement for the flow test should be reviewed with the Village Engineer.*

Comment addressed.

63. *Section IV.G.1(b) should include a discussion of the existing capacity of the Mamaroneck Wastewater Treatment Facility.*

Comment addressed.

64. *Sections IV.G.1(d) and IV.G.3(d), regarding solid waste, should also include a discussion of recycling.*

Comment addressed.

CHAPTER IV.H. TRAFFIC & TRANSPORTATION

65. *Section IV.H.3.A.a – While this section provides a description of the anticipated trip generation for the proposed project, it does not include a discussion of vehicular circulation as the section title “Vehicle Circulation” infers. A vehicular circulation discussion is, however, provided within Section IV.H.4 (“Mitigation Measures”) and in the Provident Engineering Traffic & Parking Study and should also be included within this section (Section IV.H.3.A.a) of the DEIS.*

Comment addressed. A discussion on vehicular circulation has been provided in section IV.H.3.A.a of the revised pDEIS.

66. *Section IV.H.3.A.a – An analysis of the Fenimore Road and Railroad Way intersection has not been provided. As required by the Scoping Document, this Section should include a capacity analysis at this intersection for Existing, No Build, and Build conditions.*

Comment addressed. A capacity analysis of the Fenimore Road and Railroad Way intersection has been provided for the Existing, No Build, and Build conditions.

67. *Section IV.H.1.a – The dates and time periods of the collected traffic counts should be provided. The traffic count data should be provided as part of the Traffic & Parking Study backup.*

Comment partially addressed. While the dates and time periods of the collected traffic counts are provided in the text, the traffic count data is not provided as part of the Traffic & Parking Study backup and should be provided.

68. *Section IV.H.2 – This section does not identify the traffic volumes for the Future Conditions without the Proposed Action (“No Build”), how those volumes would be developed, an analysis for the No Build condition, or the No Build year. The growth factor utilized to develop the future volumes along with a list of No Build projects based on information from the Village should be provided. A figure should be provided that shows the No Build traffic volumes for the study area intersections. Any future roadway improvement projects in the area that could potentially affect travel patterns in the area should be identified and incorporated into the analysis. Discussions and analyses for all other elements examined in Existing and Build conditions (e.g., parking, rail operations, etc.) should also be provided for No Build conditions.*

Comment partially addressed. This section should include the following:

- (1) A figure which depicts the No Build traffic volumes for the study area intersections (this figure is included in the Provident Traffic and Parking Study).**
 - (2) Text which states what the No Build year is**
 - (3) A table which presents the No Build analysis results**
 - (4) A discussion on any future roadway improvement projects in the area, or lack thereof, which could potentially affect travel patterns in the area**
 - (5) Discussions and analyses for all other elements examined in Existing and Build conditions (e.g., parking, rail operations, etc.) should also be provided for No Build conditions.**
69. *Section IV.H.1.B – The discussion on rail transportation should include rail traffic controls (e.g., the railroad crossing on Fenimore Road) as well as times and frequency of CSX rail operations in the Project Site vicinity.*

Comment partially addressed. While it is stated in the DEIS that “The number of trains and their times are limited...”, specific times and frequencies of the CSX rail operations in the Project Site vicinity should be provided.

70. *Section IV.H.4 – While some potential impacts due to the proposed project’s vicinity to the railroad tracks have been noted in this Section, an assessment of potential impacts to the railroad tracks due to*

stormwater runoff or drainage, potential conflicts between rail and vehicular traffic, and potential wind, noise, and lighting impacts should also be provided.

Comment partially addressed. The DEIS states that “There will be no traffic impacts to the railroad tracks due to the Proposed Action”. This statement should be further expanded to discuss potential conflicts between rail and vehicular traffic.

In addition to the section-specific completeness comments listed above, the following are general comments that apply to the Traffic and Transportation chapter of the DEIS, as well as the supporting Traffic & Parking Study:

71. *A qualitative assessment of vehicular and pedestrian safety on-site and in the study area should be provided in Chapter IV.H. and Traffic & Parking Study.*

Comment partially addressed. Discussion should be expanded to include the broader study area.

72. *Relevant information provided in Chapter IV.J (“Building Demolition & Construction”) should be referenced or repeated in Chapter IV.H (“Traffic & Transportation”) of the DEIS and the Traffic & Parking Study in order for the DEIS to be in compliance with the Chapter IV.H Scoping Document requirements.*

Comment addressed. Chapter IV.J (“Building Demolition & Construction”) has been referenced in the Traffic chapter of the DEIS.

73. *Please verify the trip generation numbers provided in Table IV.H-2 (“Trip Generation”). Chapter IV.H states that the self-storage component of the proposed project would provide an additional 321 storage units. However, Section 2.0 of the Traffic & Parking Study states the number of trips that would be generated by an additional 310 storage units, rather than 321 storage units. In addition, a review of the trip generation data provided in the Institute of Transportation Engineers (ITE) Trip Generation Manual 10th Edition shows that the Peak Hour of Generator rates and/or equations provide the more conservative trip generation numbers when compared to those for the Peak Hour of Adjacent Street Traffic rates and/or equations. The most conservative trip generation numbers should be utilized.*

Comment partially addressed. The Traffic & Parking Study has been correctly revised to state that the number of trips that would be generated by 321 storage units. However, the less conservative Peak Hour of Adjacent Street Traffic rates/equations appear to have still been used.

74. *The trip generation discussion in Section IV.H.3.A.a mentions trip generation numbers for the Weekend peak hour only for the self-storage component of the proposed project. Weekend trip generation numbers are not discussed for the retail component nor are Weekend peak hour trip generation numbers provided in Table IV.H-2. As the provided Weekend peak hour trip generation numbers are higher than both the Weekday AM and Weekday PM peak hours, a Weekend peak hour analysis should also be provided.*

Comment not addressed.

CHAPTER IV.I. ECONOMIC & FISCAL ANALYSIS

75. *The sources for the statistics that 10% of households in the United States use self-storage facilities, and that the “industry standard” is 7.0 square feet per person, should be provided in both this chapter and the Chiswell and Associates report in Appendix M.*

Comment addressed.

76. *Figure IV.I-1 has a number of printing errors that do not appear on the PDF.*

AKRF has a digital copy of this version. This should be checked in the hard copies.

77. *Page IV.I-5, the projected taxes presented in Section 3.a should be broken down by taxing jurisdiction in a similar manner to the existing tax revenue presented in Table IV.I-1.*

Comment addressed.

CHAPTER IV.J. BUILDING DEMOLITION & CONSTRUCTION

78. *Page IV.J-2 indicates 400 cubic yards of excavation, but page IV.J-6, indicates 550 cubic yards of excavation of which approximately 330 cubic yards would be reused as fill. Further, the construction plans in the Excavation Work Plan (EWP) indicates a cut of 69.31 cubic yards of excavation, and a fill of 127.91 cubic yards. Please clarify the cut and fill estimations.*

Comment partially addressed. The chapter text has been updated for consistency. However, sheet C-2 on page 327 of the Appendix PDF still shows 69.31 cubic yards of excavation, and a fill of 127.91 cubic yards.

79. *Page IV.J -8 should include additional detail on how the railroad tracks would be protected during building demolition.*

Comment addressed.

80. *Fill is a State regulated material that includes specific handling requirements once excavated, and Section IV.B. Geology of the DEIS indicated that soil boring logs documented the presence of ash and slag within the fill. Measures for characterization of the fill material must be completed in accordance with State approved methods, and identify State requirements and/or limitations for the reuse of fill as on-site backfill. As required by the Scoping Document, this section should identify and analyze proposed sediment and erosion control measures, and describe any site or construction constraints anticipated as a result of the existing conditions' analysis.*

Comment addressed.

CHAPTER V. ALTERNATIVES

81. *Table V-1, Comparison of Alternatives, should include a summary of each of the technical areas analyzed in the DEIS.*

This comment has not been addressed, the technical areas are not mentioned in the table.

CHAPTER VI. SIGNIFICANT ADVERSE IMPACTS THAT CANNOT BE AVOIDED

82. *This chapter is complete with regards to the Scoping Document.*

CHAPTER VII. IRREVERSIBLE & IRRETRIEVABLE COMMITMENT OF RESOURCES

83. *This chapter is complete with regards to the Scoping Document.*

CHAPTER VIII. GROWTH INDUCING ASPECTS OF THE PROPOSED ACTION

84. *This chapter is complete with regards to the Scoping Document.*

APPENDICES

85. *Please include the Appendix letter (i.e. A, B, C) on the tab sheets.*

This comment has not been addressed.

86. New comment: Please include a table of contents with the Appendix volume.