

Appendix C Index of Comments and Responses

Commentor ID	Last Name	First Name	Organization	Address	City	State	Zip	Email Address	Phone Number	Comment Format	Dated	Notes
1	Nicholas	Lisa	City Senior Planner	108 E Green Street	Ithaca	NY	14850	LNicholas@cityofithaca.org	607-274-6557	Email	2/16/2016	
2	Bosak	Jon	Town Planning Board Mem.	215 N. Tioga Street	Ithaca	NY	14850			Letter	2/16/2016	
3	Collins	Linda	Town Planning Board Mem.	215 N. Tioga Street	Ithaca	NY	14850			Letter	2/16/2016	
4	Loque	Tim	City Dir of Eng. Services	108 E Green Street	Ithaca	NY	14850	TLoque@cityofithaca.org	607-274-6535	Email	2/26/2016	
5	Stundtner	Robert	Resident/Neighbor		Ithaca	NY				Public Hearing	3/29/2016	
6	DePado	Rich	Resident/Town Board Mem.		Ithaca	NY				Public Hearing	3/29/2016	
7	Hang	Walter			Ithaca	NY				Public Hearing	3/29/2016	
8	Brock	Cynthia	Resident/City Council		Ithaca	NY				Public Hearing /	3/29/2016	
9	McGonigal	George	Resident/City Council		Ithaca	NY				Public Hearing	3/29/2016	
10	DiSchiava	Ken			Ithaca	NY				Public Hearing	3/29/2016	
11	Giavara	John	South Hill Civic Association / Ithaca		Ithaca	NY		john@swc1313@gmail.com		Email	4/10/2016	
12	Forbes	Janet	Resident	225 Columbia Street	Ithaca	NY		jforbes@swcvr.ir.com		Email	5/8/2016	
13	de Araujo	Fernando	Ithaca-Tompkins Transportation		Ithaca	NY				Email	5/2/2016	
14	Stundtner	Robert	Resident	333 Spencer Road	Ithaca	NY		rs2@cornell.edu		Email	5/20/2016	Comments are from him and Jennifer Cleland, both land owners
15	Goodman	Bill	Town of Ithaca Town Board	215 N. Tioga Street	Ithaca	NY	14850			Letter sent via	5/24/2016	Letter from Town of Ithaca Town Board signed by Bill Goodman
16	Georgia	Claudia	Resident	411 Spencer Road	Ithaca	NY		claudia@ecrow@gmail.com		Email	5/25/2016	
17	Marx	Edward	Tompkins County Department of	121 East Court Street	Ithaca	NY	14850			Letter sent via	5/25/2016	
18	Wilcox	Fred	Town of Ithaca Planning Board	215 N. Tioga Street	Ithaca	NY	14850			Letter sent via	5/24/2016	Letter on behalf of the Town of Ithaca Planning Board
19	Clavel	Theresa	Resident							Email	5/25/2016	
20	Lambert	Haley	Cayuga Lake Watershed Network	POB 348	Aurora	NY	13016			Email	5/25/2016	Steward / Executive Director
21	Hathaway	Eric	City Engineering Staff	108 E Green Street	Ithaca	NY	14850	EHathaway@cityofithaca.org	607-274-6530	Email	6/30/2016	Transportation Engineer
22	Crowley	Kristina	NYS DOT	333 E Washington	Syracuse	NY	13202	kristina.crowley@dot.ny.gov	315-428-4382	Email	2/10/2017	NYS DOT Combined Comments
23	Okis	Jacob	NYS DOT	333 E Washington	Syracuse	NY	13202	jacob.okis@dot.ny.gov	315-428-4623	Email	2/13/2017	NYS DOT Additional Comment
21	Hathaway	Eric	City Engineering Staff	108 E Green Street	Ithaca	NY	14850	EHathaway@cityofithaca.org	607-274-6530	Email	3/6/2017	Add. Commentary RE. NYSDOT. Starts at Comment 21A)

Last Updated: March 16, 2017

**CHAIN WORKS DISTRICT
FINAL DGEIS COMMENT MATRIX**

X-Reference	Comment Category	Comment Subcategory	Comment	Comment Summary No.	Summary of Comment	Commenter ID	Comment ID	Sub.	Rel	Relevant DGEIS	Response to Comment
2.5-1	Site Program	LEED ND	About half of the proposed housing units are not in compact mixed use neighborhoods- which is the projects overriding aim. This really feels like two projects: one compact mixed use- live/work/pay and one more suburban. So- are you applying for LEED ND for all the site- or just the part that is compact mixed use development?	1	Project feels like two separate projects, one mixed-use and one suburban. Define the LEED ND Boundary and explain how the project meets LEED ND Standards.	1	1V	Y	Y	2.5	LEED ND can only be applied to whole parcels. Different parts of the development vary in density and mix but all are compact and have close proximity to live/work/play amenities. Accordingly, the entire Site will be classified as LEED ND. The reason that portions of the Project seem suburban or undeveloped is that large portions of the Site exceed 20% slopes, which makes these areas unsuitable for development.
2.5-2	Site Program	LEED ND	You describe CW-2 as a compact dense urban environment – can you describe how this layout meets that definition?	2	Explain how CW2 meets LEED ND standards and is a compact dense urban development.	1	1W	Y	Y	2.5	The Design Standards describe CW2 as "primarily residential buildings. They may have a wide range of building types including detached single family, multi-family, and rowhouses. Setbacks and landscaping are variable. Streets with curbs and sidewalks define medium-sized blocks." The proposed layout includes mostly townhouses and the smallest blocks possible with the most connectivity possible given site constraints. This design is a significantly more compact and urban residential form than any development that currently exists in the Town and it is walkable/bike-able to major employment and educational amenities within and adjacent to the development, which makes this a compact dense urban environment. The Conceptual Site Layout Plan has been revised to depict an expanded sidewalk network to ensure connectivity of the developable areas as well as adjacent properties.
2.5-3	Site Program	LEED ND	Chapter 1: Introduction, Page 1-2:The applicant should consider taking a holistic approach to LEED ND certification, focusing on obtaining the LEED ND credits that have the greatest environmental, economic, and/or social benefits, and implementing design elements which reduce greenhouse gas emissions and meet the relevant Town of Ithaca Comprehensive Plan goals. The applicant should be aware that LEED ND credit weighting is not necessarily an indicator of the greatest environmental, economic, or social benefit specific to the Site.	3	The Project Sponsor should consider taking a holistic approach to LEED ND certification, focusing on obtaining the LEED ND credits that have the greatest environmental, economic and social benefits to meet relevant Comprehensive Plan goals for the City and Town.	18	18A	Y	Y	2.5	<p>The Project Sponsor is seeking LEED ND: Plan certification as required by the NYSERDA Category 3 grant award and is the basis for the Conceptual Site Layout Plan development. The LEED Rating System is a voluntary, consensus driven, internationally-recognized green building certification system developed by the US Green Building Council, providing third-party verification that a building or community was designed and built using strategies aimed at improving performance across metrics such as energy savings, water efficiency, greenhouse gas emissions reduction, improved indoor environmental quality, and resource stewardship. The point allocation process employed by the LEED Rating System serves as a method for producing a simplified guide for project teams to navigate complex and competing issues. In LEED v4, the allocation of points among credits is based on the potential environmental impacts and human benefits of each credit with respect to a set of impact categories. A combination of approaches, including energy modeling, life-cycle assessment, and transportation analysis, is used to quantify each type of impact. LEED v4 builds on the analytical framework of LEED 2009, which was based on the U.S. Environmental Protection Agency's TRACI3 environmental impact categories as the basis for weighting each credit. TRACI was developed to assist with impact evaluation for life-cycle assessment, industrial ecology, process design, and pollution prevention. Further details on the LEED v4 credit weighting process are available from the US Green Building Council publication "LEED v4 Impact Category and Point Allocation Development Process," located at: http://www.usgbc.org/sites/default/files/LEED%20v4%20Impact%20Category%20and%20Point%20Allocation%20Process_Overview_0.pdf.</p> <p>The LEED for Neighborhood Development v4 rating system is designed primarily for the planning and development of new green neighborhoods, whether infill sites or new developments proximate to diverse uses or adjacent to connected and previously developed land. Thus, this LEED rating system was selected for this Project for its specific prerequisites and credit categories related to redevelopment of aging brownfield sites into revitalized neighborhoods by rewarding connections beyond the site, walkable streets within the site, and the adaptive reuse of historic buildings and structures. Unlike other LEED rating systems, which focus primarily on green building practices and offer only a few credits for site selection and design, LEED for Neighborhood Development places emphasis on the site selection, design, and construction elements that bring buildings and infrastructure together into a neighborhood and relate the neighborhood to its landscape as well as its local and regional context. To achieve LEED ND v4 Plan certification, this Project must document compliance with all prerequisites and a sufficient number of credit requirements. The NYSERDA grant requires LEED ND Certification of Gold or higher.</p> <p>The Town of Ithaca Comprehensive Plan's Section 3.4.4 'Area of Special Concern: Emerson Center' cites redevelopment goals as a mixed use complex that would include apartments, live-work space, studios, retail, offices, and light industrial established by an approved redevelopment plan, with density taking full advantage of the site's location near central Ithaca. The Goals of the City and Town Comprehensive Plans, along with LEED ND credit weighting, were carefully considered during the design of the Conceptual Site Layout Plan.</p>
2.5-4	Site Program	LEED ND	The applicant should strongly consider exceeding the LEED ND credit requirements because some Site characteristics which contribute to LEED credits are endemic to the Site location. For example, in the Smart Location & Linkage category, credits earned for "Brownfield Remediation" and "Housing and Jobs Proximity" are automatically earned because of the Site location and history.	4	The applicant should strongly consider exceeding the LEED ND credit requirements because some Site characteristics which contribute to LEED credits are endemic to the Site location.	18	18B	N	Y	2.5	This comment is acknowledged. The LEED for Neighborhood Development rating system was specifically selected for its prerequisites and credit categories related to redevelopment of aging brownfield sites into revitalized neighborhoods by rewarding connections beyond the site, walkable streets within the Site, and the adaptive reuse of historic buildings and structures. Site selection is a core attribute of the LEED for Neighborhood Development rating system because where development happens is important. Preference is given to locations close to existing town and city centers with existing utilities, roads, and other infrastructure in place, sites with good transit access, infill sites, previously developed sites, and sites adjacent to existing development. The Project meets each of these LEED ND fundamentals. With this location efficiency the benefits are multiplicative and reinforcing: convenient transportation choices, such as buses, car sharing, bicycle lanes, and sidewalks, are generally available near downtowns, which are also the locations associated with shorter automobile trips. It is important to note that exceeding LEED for Neighborhood Development credit requirements may also exceed DGEIS impact thresholds in some credit categories.

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2.5-5	Site Program	LEED ND	Key LEED ND credits which the applicant should strongly consider: Smart Location & Linkage-Access to Quality Transit, Bicycle Facilities, Site Design for Habitat or Wetland and Water Body Conservation; Neighborhood Pattern & Design- Housing Types and Affordability, Reduced Parking Footprint, Transit Facilities, Transportation Demand Management, Access to Civic & Public Space, Community Outreach and Involvement; Green Infrastructure & Buildings- Certified Green Buildings, Optimize Building Performance, Indoor Water Use Reduction, Outdoor Water Use Reduction, Solar Orientation, Renewable Energy Production, District Heating and Cooling, Infrastructure Energy Efficiency, Light Pollution Reduction	4	No Summary.	18	18C	Y	Y	2.5	Same as 4.
2.5-6	Site Program	LEED ND	*(The following section was presented as a table in the actual letter. Each set of [] contains the info as it would be read across the rows. The following is an example of how the info is laid out in the brackets in the order of the column titles []: [LEED Certification Standard, LEED Version 4.0 Credit Threshold, Suggested Credit Threshold]) Here is the comment -> Excluding the following credits, the applicant should consider meeting the following minimums for LEED certification: table info: [Certified, 40-49, 60-69] [Silver, 50-59, 70-79] [Gold, 60-79, 80-99] [Platinum, 80+, 100+] Excluded Credits-Site Requirements: Preferred Locations – 10 credits, Brownfield Remediation – 2 credits, Housing and Jobs Proximity – 3 credits, Visitability and Universal Design – 1 credits, Innovation – 5 credits, Regional Priority Credit Defined – 4 credits	4	No Summary.	18	18D	N	Y	2.5	Same as 4.
2.5-7	Site Program	Sustainable Design	In the last sixty years, the largest development project on South Hill was the relocation of Ithaca College (IC) from downtown Ithaca to its present location atop South Hill, directly across State Highway 96B from the proposed Chain Works District project. The relocation of the IC campus to South Hill happened without the benefit of a draft Generic Environmental Impact Statement (dGEIS). This should serve as a good example of why dGEIS documents are important when assessing the impact large development have on climate change. In todays climate, fossil fuel consumption is by far the most pressing issue facing our environment and dGEIS should address this issue directly. For instance, IC is currently reevaluating its fossil fuel consumption to correspond with the 2009 Ithaca College Climate Action Plan (ICCAP), which calls for IC to be fossil fuel free by 2050. New buildings built today on the IC campus are required to have a dGEIS and hopefully these documents will be sensitive to the ICCAP. The Chain Works District (CWD) has the potential to become the largest consumer of fossil fuels on South Hill within the next ten to fifteen years. For this reason I believe the CWD developer, Unchained Properties (UP), should work cooperatively with IC and other large energy consumers on South Hill to create a Climate Action Plan (CAP) that commits all parties to the common goal of becoming fossil fuel free by 2050 or before. I realize this is thinking outside the dGEIS box, but adding this suggestion to the final Generic Environmental Impact Statement (fGEIS) for the CWD project might be the incentive needed to get South Hill stakeholders cooperating to create a community based CAP for the entire South Hill community.	7	The Chain Works District (CWD) has the potential to become the largest consumer of fossil fuels on South Hill within the next ten to fifteen years. For this reason I believe the CWD developer, Unchained Properties (UP), should work cooperatively with IC and other large energy consumers on South Hill to create a Climate Action Plan (CAP) that commits all parties to the common goal of becoming fossil fuel free by 2050 or before.	11	11A	Y	Y	2.5	The design goal is to reduce energy use over regional average (assumes conventional energy to be natural gas and grid electricity) for building type by 70% (Architecture 2030) and consumption per finished 1 square foot (the baseline used is 98,000BTU/sq. ft. based on the 2003 U.S. EIA Middle Atlantic Commercial Building Survey, the most recent available.). The fossil fuel use reduction will be a combination of energy efficiency and green energy generation. Section 5.8.3 of the DGEIS includes the estimate of energy usage reduction of up to 53,000 MMBTUs per year. Also, The Project Sponsor intends to continue to participate in the South Hill Civic Association as well as continue cooperative energy conservation conversations with other South Hill institutions such as Ithaca College.

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2.5-8	Site Program	Sustainable Design	In my capacity as the President of the South Hill Civic Association (SHCA) and a founding member of Ithaca Community Energy (ICE), I recently encouraged facility management from IC, UP and the South Hill Business Campus (SHBC) to discuss developing a South Hill Community Microgrid. Community microgrids have the potential to seriously reduce fossil fuel consumption because they generated energy within the community, which is most likely to come from renewable energy sources. All three parties seemed to be genuinely interested in pursuing the concept of a South Hill Community Microgrid. Mitigating climate change should be included in Ithaca's fGEIS for the Chain Works District if, for no other reason, its sheer size. One way this could be accomplished is to include in the fGEIS that monthly meetings be held within the South Hill community to develop a CAP for South Hill. The SHCA pledges to continue working with the entire South Hill community on issues related to fossil fuel reduction and we hope that the fGEIS for the CWD will help us accomplish our goal.	8	Include in the FGEIS that monthly meetings be held within the South Hill community to develop a CAP for South Hill and to discuss development of a South Hill Community Microgrid. Community Sustainable Energy for all of South Hill should be an integral part of the Chain Works Project.	11	11B	Y	Y	2.5	The Project Sponsor has actively attended SHCA meetings since investigating the feasibility of the Project. The Project Sponsor intends to continue working with the SHCA on sustainability, microgrids, energy and other issues of importance for the community as appropriate. The Project Sponsor intends to incorporate sustainable energy however this Project focuses on the property that is under control of the Project Sponsor. The CWD cannot commit other parties to a particular sustainability program.
2.5-9	Site Program	Sustainable Design	Since 1974 I have lived on Columbia St--across from The Inn on Columbia B&B. A private development of this magnitude will profoundly change my neighborhood. I am strongly advocating that Community Sustainable Energy for all of South Hill be an integral part of the Chain Works Project. This would include working with city/town government to obtain grants and funding; with NYSEG or other non NYSEG infrastructures and the possibility that some of this community sustainable energy would be publicly owned. While this private development project may ease the housing shortage and provide many mixed use benefits, I want you to seriously consider the impact on the South Hill neighborhood at large and the benefits that incorporating community sustainable energy would provide both environmentally and economically.	9	I am strongly advocating that Community Sustainable Energy for all of South Hill be an integral part of the Chain Works Project. I want you to seriously consider the impact on the South Hill neighborhood at large and the benefits that incorporating community sustainable energy would provide both environmentally and economically	12	12A	Y	Y	2.5	Same as 8.
2.5-10	Site Program	Sustainable Design	2.6.3 Sustainability Denser infill development on a close-in grayfield/brownfield site has a much lower environmental footprint than the alternative of low density sprawl on more remote greenfield sites. The DGEIS doesn't mention the benefits of redevelopment, versus the impact from conventional development that would otherwise take place to satisfy market demand.	10	The DGEIS doesn't mention the benefits of redevelopment of a former industrial site, versus the impact from conventional development on greenfields that would otherwise take place to satisfy market demand.	18	18J	Y	Y	2.5	The environmental benefits are outlined in the DGEIS as indicated by the LEED ND point system. Additional points are provided for redevelopment/brownfield project sites. Nonetheless, the comment is acknowledged and the DGEIS lists the benefits of developing the industrial site versus typical greenfield development by highlighting the inherent benefits. These benefits include, but are not limited to, preventing sprawl, increasing density near the city center which will reduce traffic impacts and energy needs by encouraging pedestrian and transit use, insuring that the Site is utilized to enhance the tax base, and facilitating the environmental remediation of the Site to allow residential and commercial uses.
2.5-11	Site Program	Aligns with Existing Plans	2.6.5 Aligns with City and Town Comprehensive Plans The DGEIS generally follows many goals and recommendations of the 2014 Town of Ithaca Comprehensive Plan. However, the DGEIS or proposal does not address a few other key goals of the Plan that are relevant to a project of this scale. This includes the following: LU-4-C Ensure that a variety of housing types and prices are provided that support a broad range of household types, sizes, lifestyles, life stages, and household incomes in new neighborhoods.; HN-2 Encourage a balanced blend of high-quality housing opportunities, including moderately priced housing to provide a range of prices to accommodate the local workforce.; HN-2-A Require developers to provide a certain percentage of residential development as moderately priced housing affordable (affordable?) to households in them median income range (80% to 120% of Tompkins County median household income), and/or consider using density bonuses and other modifications of development standards ... to encourage developers to create moderately priced housing units.; RE-1-F Require new parks and common open space to be amassed into meaningful, quality spaces. Require parks and common open space to be contiguous to the maximum extent practicable, and located where they are visually and functionally part of the public realm. - The FEIS should describe how Chain Works would help satisfy these goals and recommendations.	11	The DGEIS does not address a few key goals of the City and Town Comprehensive Plans that are relevant to a project of this scale including the provision of a broad variety of housing types and prices and the arrangement of open space.	18	18L	Y	Y	2.6	The Project Sponsor will address these additional goals to greatest extent practicable in the Final GEIS.

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2.5-12	Site Program	Brain Drain	2.6.4 Attract and retain entrepreneurs The DGEIS claims that Chain Works will solve "brain drain" by "redevelopment of the Site into a 'live, work, play' urban center". The reasons for Ithaca's "brain drain" are many and nuanced, and go beyond the lack of startup or incubator space. Even then, the region's population continues to grow, and its Census tracts top the nation for educational attainment. Ithaca remains an aspirational community for those drawn to the environment of a college town. Stating that "... it is clear that the regional "brain drain" is a solvable issue with redevelopment of the site", as if Chain Works will be a cure-all, seems like an exaggeration of the project's potential benefits.	12	Ithaca remains an aspirational community for those drawn to the environment of a college town. Stating that "... it is clear that the regional "brain drain" is a solvable issue with redevelopment of the site" seems like an exaggeration of the project's potential benefits.	18	18K	N	Y	2.6	Acknowledged.
2.5-13	Site Program	Low Income/Student Housing	2.6.1 Housing The total Chain Works development will involve over 900 units of housing in an area that is walkable, well served by transit and very close to employment centers and necessary services. However, the DGEIS does not say anything about developing any portion of the 448 units proposed for CW2 and 467 units proposed for CW3 to be affordable to the median income household. By contrast, in Section 2.7.2.1, the DGEIS suggests that the project will fill the need for the "approximately 1,000 moderate to luxury rental units" that were mentioned in the 2011 Danter Company housing study that was prepared for the Downtown Ithaca Alliance. Of the new housing units at Chain Works, about how many will directly satisfy non-student community housing needs? How many will directly satisfy the affordable housing needs for different income levels? This means units intended for occupancy by the broader general public -- for-sale units or lease terms that do not follow an academic calendar; rental of full unfurnished units with no by-the-bedroom leases; conventional floorplans with no roommate suites; and development or management by an entity that does not specialize in student housing.	13	Of the new housing units at Chain Works, about how many will directly satisfy non-student community housing needs? How many will directly satisfy the affordable housing needs for different income levels? Multiple elements found in the DGEIS hint at purpose-built student housing -- which does not directly satisfy housing demand among the general public. If student housing will be a part of Chain Works, the DGEIS may be exaggerating the project's potential impact on "satisfy[ing] a community need for housing" and "making housing more affordable".	18	18G	Y	Y	2.6	The SEQR Handbook defines a GEIS as being more general or conceptual in nature. The proposed project is generalized by impact. This is done by estimating a total number of units with an average number of bedrooms in an effort to estimate water usage, traffic impacts, community service demand, etc. This also allows the Applicant to estimate average rentals based on current market demand. The higher level of rental determination requested by Commenter requires the Applicant to specify actual residential unit layouts and furnishings that is not part of the scope for a Generic proposal such as this. Current average market prices for the surrounding area will be provided for the other unit types. The Project Sponsor proposes that the dwelling units will be market-rate with a great variability in rent structures depending on the type and location of the unit. There are no plans to provide specific housing types (i.e. student or low-income housing units) however, through a variety of rental types, there will be a level of housing affordability accommodating different demographics. The Project Sponsor does not intend to provide subsidized low-income affordable housing as part of the Project. The costs associated with redeveloping the Site, such as costs to shepherd the Project through approvals from two municipalities and an amended Record of Decision from NYSDEC; to perform extensive environmental investigations of the Site; to comply with implementing a Site Management Plan during construction and operating and maintaining mitigation systems to prevent vapor intrusion; and to convert old industrial structures and related infrastructure to allow mixed uses will be higher than if one were to develop a greenfield. Thus rents will need to be market rate for this Project to succeed. The Project Sponsor also does not intend to provide a student housing only complex or purpose-built student housing. However, the housing stock made available through this Project will certainly create more opportunities and choices for students wishing to live in the area. □
2.5-13	Site Program	Low Income/Student Housing	The DGEIS uses total bedroom count to describe the residential development, which implies student housing. The DGEIS cites a "2006 Housing Study", most likely the Tompkins County Affordable Housing Needs Assessment. That study finds a need for 3,894 new housing units between 2005 and 2014, and specifically excludes student households. While HUD may tally 2,034 new units built in that timeframe, as the DGEIS states, there is no breakdown of how many units are student-oriented (and not meeting resident demand), or how they satisfied the housing needs for different income groups. According to the Housing Strategy for Tompkins County (6-19-2007), "... a housing strategy for the county should plan for adding at least 4,000 units to the local housing stock over ten years, with at least half of these units affordable to households making less than 80% of median income. It needs to be emphasized that this demand does not include students ...". Later in the DGEIS, Figure 2.7.6 (Building 24 – Potential Typical Residential Floor Plan), shows apartment floorplans with certain traits that are common to purpose-built student housing, and not usually seen in apartments built for general occupancy. This includes a symmetrical roommate suite-style plan, bedroom size and bed-to-bath parity, and the lack of a bathroom directly accessible from a common hall. These elements further hint at purpose-built student housing -- which does not directly satisfy housing demand among the general public -- being a part of the Chain Works project. If student housing will be a part of Chain Works, the DGEIS may be exaggerating the project's potential impact on "satisfy[ing] a community need for housing" and "making housing more affordable".	13	Same as 13.	18	18H	Y	Y	2.6	Same as 13. In addition, through supply and demand, the cost of housing will be lower and thus more affordable with the Project's additional housing stock in the greater Ithaca market than if it were not available.

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2.5-13	Site Program	Low Income/Student Housing	In a third case, the scoping requirement to "Discuss the diversity of housing unit types as well as pricing. This will include an estimate on the number of units for each housing type and size" is mapped to DGEIS section 8.3. This section begins with the statement that "housing types will vary throughout the Site, which will provide a wide-range of market rate housing opportunities," but the rest of the piece gives the impression that there are no actual low-income housing opportunities in this project. If there are, these need to be specified, and if not, that fact should be recognized. We are not presently convinced that putting low-income housing in this project is necessary to achieve the goal of addressing gentrification in the city, but the facts here should be stated more clearly.	13	Same as 13.	18	18BB	Y	Y	2.6	Same as 13.
2.5-13	Site Program	Residential Uses	In a third case, the scoping requirement to "Discuss the diversity of housing unit types as well as pricing. This will include an estimate on the number of units for each housing type and size" is mapped to DGEIS section 8.3. This section begins with the statement that "housing types will vary throughout the Site, which will provide a wide-range of market rate housing opportunities," but the rest of the piece gives the impression that there are no actual low-income housing opportunities in this project. If there are, these need to be specified, and if not, that fact should be recognized. I am not presently convinced that putting low-income housing in this project is necessary to achieve the goal of addressing gentrification in the city, but the facts here should be stated more clearly.	13	Same as 13.	2	2I	N	N	2.7	Same as 13.
2.5-13	Site Program	Residential Uses	The applicant was instructed in the Final Scoping Document, Chapter 9: Growth Inducing Aspects and Character of Community, pages 60-61 to include in the DGEIS discussion of a number of specific potential impacts relating to housing, thus establishing the breadth of information required (bolding added): 1) Discuss the diversity of housing unit types as well as pricing. This will include an estimate of the number of each housing type and size. 2) Evaluate existing market demand and need with a comparison to the proposed housing portion of the Project. 3) Discuss the gentrification of urban areas and the impacts to the City and Town with a concentration on the scale of the development and tax revenues. Each of the topics above was at least mentioned in the DGEIS, Chapter 8: Growth Inducing Aspects and Character of Community, in either Section 8.3: Population/Demographics or Section 8.4: Gentrification. However, given that these two sections together amount to approximately 2 pages in length, it is my opinion that none of the above points have been adequately addressed in terms of both the depth and type/source of information presented. Without data drawn from a wider range of sources that can serve as the basis for a more in-depth analysis of this complex set of issues, I feel strongly that readers of the DGEIS do not have adequate information to make informed decisions about these important components of the environmental analysis.	13	Same as 13.	3	3B-1			2.7	Same as 13.
2.5-13	Site Program	Residential Uses	This entire point (Item #1 in 3B) is addressed in just three paragraphs in Section 8.3. It is stated that the project will include "units averaging 2 bedrooms, with a range from studios to 3 bedrooms" and are described as being located in "double loaded corridor apartment buildings", "loft and penthouse units in the historic buildings" and "townhouses". However, there is no attempt made to provide, as required, the projected number or percentage of the proposed 900+ residential units that will fall into each of these size and type categories. The only pricing information presented is for an "average 2 bedroom unit" projected to be "around \$2,370" which would "be affordable for households with a combined income of \$94,800". No pricing data is projected for the studio, 1 bedroom or 3 bedroom units nor is there any information provided concerning the expected pricing differentials across the various housing types.	13	Same as 13.	3	3C	N	Y	2.7	Same as 13.
2.5-14	Site Program	Residential Uses	This section mentions the CW2 subarea will have a "variety of housing types". These housing types include "point-access", "townhomes or double loaded", and "multi-unit corridor configurations". These are not different types of housing, but different forms of access to individual units in multi-unit buildings. Please correct this.	14	No Summary.	18	18P-2	Y	Y	2.7	See Response to Comment 13.

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2.5-15	Character of Community	Housing Market Study	The applicant was instructed in the Final Scoping Document, Chapter 9: Growth Inducing Aspects and Character of Community, pages 60-61 to include in the DGEIS discussion of a number of specific potential impacts relating to housing, thus establishing the breadth of information required (bolding added): 1) Discuss the diversity of housing unit types as well as pricing. This will include an estimate of the number of each housing type and size. 2) Evaluate existing market demand and need with a comparison to the proposed housing portion of the Project. 3) Discuss the gentrification of urban areas and the impacts to the City and Town with a concentration on the scale of the development and tax revenues. Each of the topics above was at least mentioned in the DGEIS, Chapter 8: Growth Inducing Aspects and Character of Community, in either Section 8.3: Population/Demographics or Section 8.4: Gentrification. However, given that these two sections together amount to approximately 2 pages in length, it is my opinion that none of the above points have been adequately addressed in terms of both the depth and type/source of information presented. Without data drawn from a wider range of sources that can serve as the basis for a more in-depth analysis of this complex set of issues, I feel strongly that readers of the DGEIS do not have adequate information to make informed decisions about these important components of the environmental analysis.	15	Evaluate existing market demand and need with a comparison to the proposed housing portion of the Project. (Please Note: Original Comment split into three parts this comment summarizes Item 2).	3	3B-2	Y	Y	2.7/8.3	As part of the Site Plan process that involves residential uses, the Applicant will consult with the latest Ithaca oriented housing studies.
2.5-16	Character of Community	Housing Market Study	(Item #2 in 3B) Section 8.3 (DGEIS) presents a number of facts and figures relating to various aspects of the "existing housing market". However, this data is not consistent nor cohesive and does not fulfill the requirement for an "evaluation of existing market demand". To begin with, the applicant does not specifically define the geographic boundaries of the housing market that may be impacted. At various times the market area is referred to as the "City of Ithaca", the "Town" (of Ithaca), "Tompkins County" and the "Ithaca Metropolitan Statistical Area". These are, indeed, very different units of geography across a range of variables. Without a well-defined, agreed upon definition of what constitutes the physical extent of the existing housing market, there is no valid basis on which to "evaluate" market demand nor can there be any valid "comparison to the proposed housing portion of the Project", both of which are required by the final Scoping Document. In addition, a robust discussion of this topic would also include the identification and description of specific consumer markets which the project is intending to target. Targeting allows for breaking the general population within the larger housing market into smaller demographic segments that differ across a number of economic, social and behavioral dimensions, thus providing a more solid basis on which to "evaluate existing market demand". Although there is some vague mention of targeting (e.g. "a wide spectrum of demographics", "senior population", "market for luxury, upscale and moderate/affordable new rental units") none of these are addressed in any depth and there is no attempt to tie them specifically to "existing market demand and need" as it relates to the proposed project.	13	Without a well-defined, agreed upon definition of what constitutes the physical extent of the existing housing market, there is no valid basis on which to "evaluate" market demand nor can there be any valid "comparison to the proposed housing portion of the Project", both of which are required by the final Scoping Document.	3	3D	N	N	2.7/8.3	Same as 13.

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2.5-17	Site Program	Low Income/Student Housing	2.7.2.1 Residential This section makes statements about the 2012 Downtown Housing Strategy in the City of Ithaca, New York, indicating that it "projects a shortage of approximately 1,000 moderate-to-luxury rental units by the year 2016". In reality, the report actually projects a demand for 600 to 675 "affordable-moderate" to luxury units in the extended market area (EMA). When projections include "tax credit" units, the total five-year demand is 900 to 1,000 units. From page 3-3 of the Downtown Housing Strategy: Luxury units (average monthly rent \$1,750):100-125 total units; Upscale units (average monthly rent \$1,300):200-250 total units; Affordable-moderate units (average monthly rent \$850):300 units; Tax credit units (average monthly rent \$690):300-325 units; Overall support:900-1,000 units -The Downtown Housing Strategy specifically leaves out purpose-built student housing from its projections. While this section brings up the Downtown Housing Strategy and its findings, it does not state that Chain Works will help alleviate the region's housing shortage, and to what extent – only that the project "offers a great opportunity to develop a variety of multi-unit rental buildings." Please describe how Chain Works will directly satisfy the projected demand for luxury, upscale, affordable-moderate, and tax credit units, as the Downtown Housing Strategy report describes.	17	Please describe how Chain Works will directly satisfy the projected demand for luxury, upscale, affordable-moderate, and tax credit units, as the Downtown Housing Strategy report describes and is referenced in the DGEIS.	18	18P-1	Y	Y	2.6	The Chain Works District Development does not have a complete breakdown of every single unit type out of the 915 proposed units as allowed in the GEIS process. There are a variety of unit types accommodating a wide demographic including studios, one-bedrooms, two-bedrooms, 3-4 bedrooms, duplex buildings, lofts and townhouses. There are expected to be approximately 1,830 bedrooms to assist in meeting the demand outlined in the Downtown Housing Strategy. As discuss in the DGEIS, the Project Sponsor does not propose any tax credit units.
2.5-18	Site Program	Conceptual Site Layout Plan	Wow, kind of hard to go after Walter. I've been looking at this, I'm Cynthia Brock. I'm a resident of the city and I also serve on the city council. And I like many of us have been watching this project over time before Chain Works came forward and even the possibilities. And like many of us here I see this as an opportunity to try to achieve the types of clean ups that so far we have had no leverage to facilitate. So I'm excited because of that. We have a tool in our hands we didn't have before and that's a good thing. If we all want to see more housing, safe housing we want to see a vibrant community and we want to see every aspect of the city being fully utilized and contributing to the city. So I come at that from this perspective.	18	The CWD project is an opportunity to achieve environmental remediation of the site.	8	8A	N	Y	2.7	Acknowledged.
2.5-19	Site Program	Conceptual Site Layout Plan	Figure 2.7-3: Need to see the full extend to cross section BB. Also need to see a cross section from Aurora to Turner showing relationship to existing development adjacent to the site. Also need visualization from Turner and Hillview Pl.	19	No Summary.	1	1R	Y	Y	2.7	The DGEIS has been revised to extend cross section B-B and include a new cross section from South Aurora Street to Turner Place. The view of the Proposal from this location will remain unchanged. The view from Turner Place and Hillview Place toward the Chain Works District is added to the DGEIS.
2.5-20	Site Program	Conceptual Site Layout Plan	CW-3 describes a mixed use program cluster at the entrances of driveways I & II - this appears to be all residential on the layout plans. Please explain this.	20	No Summary.	1	1Y	Y	Y	2.7	The CW3 program will allow mixed uses. For the purposes of the analysis, the Conceptual Site Layout Plan for the entrances are residential.
2.5-21	Site Program	Conceptual Site Layout Plan	In terms of uses, the last paragraph on page 2-20 starts with "this Sub Area restricts development to residential and limited commercial uses." Are commercial uses proposed for CW2 as well as residential uses? If so, what percentage will be commercial and what percentage will be residential?	21	Clarify if commercial uses will be allowed in the CW2 Sub Area and what percentage will be residential versus commercial.	18	18N-2	Y	Y	2.7	Commercial uses will be allowed in the CW2 but is estimated to be minor. The Conceptual Site Layout Plan does not depict any commercial uses in the CW2. The actual amount will be determined during the individual Site Plan process but will not exceed the 184,350 sf for the entire Project as outlined in Table 2.7-1.
2.5-22	Site Program	Conceptual Site Layout Plan	Does the BB Section conform to the conceptual Grading Plan?	22	No Summary.	1	1AB	Y	Y	2.7	Yes.
2.5-23	Site Program	Conceptual Site Layout Plan	Phase 1 includes a new road section connecting parking lots 7b & 7c. This is not mentioned in the project description – need to include additional impervious surface.	23	No Summary.	1	1AD	Y	Y	2.7	This comment was received during adequacy review. The new road section was addressed in the published DGEIS.

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2.5-24	Site Program	Conceptual Site Layout Plan	We are glad to see that the developer is preserving CW-1. We recommend the same designation be applied to CW-2. On May 18, 2016, we attended a dedication and tour of Cornell Plantations' Fisher Old-Growth Forest and Natural Area south of Rt. 13 in Newfield. We strolled through shrubland, young forest and old-growth. The transitions were dramatic and easy to see and understand. A great deal of change to the vegetation and fauna has occurred to our 2.5 acres over the past 36 years that is somewhat reflective of the tour. There are still some Ailanthus, but nearly all the Multiflora Rose is gone and the honeysuckle is greatly diminished, and many of the smaller species of native plants are also gone. Disease seems to have greatly diminished many of the hardwoods. Garlic Mustard is everywhere. Deer have always been present, but now they are clearly over populated. Three were hunted and died in our yard. Only one was successfully harvested, but the hunter left the organs for us to deal with. Northern White Cedar planted as a green fence thrived for 20 years and then one winter the deer stripped the lower 5' of branches. A couple of weeks ago we counted 10 does browsing the tender shoots on the hillside. CW-2 may not contain the most prized vegetation and fauna generally, but it's evolving and the dGEIS identifies significant areas of more valuable trees to be potentially sacrificed.	24	There is an abundance of native species in the CW2 Sub Area, therefore it should remain in a native state similar to CW1.	14	14D-1	Y	Y	2.7	The Project Sponsor states that the development of the CW2 Sub Area is a key component of the CWD and cannot remain in its native state. The potential impacts of the development of the CW2 have been thoroughly reviewed within the DGEIS. It should also be noted that a boundary will be delineated for each individual project as part of Site Plan Review. Site Plan approvals will require a vegetation survey of the individual project boundaries.
2.5-25	Site Program	Conceptual Site Layout Plan	It also makes no assessment of its value as a carbon repository and green space. The birds that nest there may not be threatened, but we know that the Catbirds will sing their jazz calls happily until it evolves to something different or is destroyed by development. We recommend that the carbon impact of CW-2 development versus remaining wild be evaluated in the FEIS. Further, we recommend that a triple bottom line evaluation of all significant projects be undertaken for their economic, social and environmental impacts in our greater community.	25	The carbon impact of developing the CW2 should be analyzed.	14	14D-2	Y	Y	2.7	The analysis of the carbon impacts was not part of the Scoping Document and accordingly was not included in the DGEIS however Chapter 9 reviews the effect on the use and conservation of energy which is a closely related subject. The Project does preserve approximately 23.86 acres of vegetation in the CW1 Sub Area. The development of 21.17 acres of forest/brush will be a negligible impact on the overall issue of carbon impact/climate change.
2.5-26	Site Program	Conceptual Site Layout Plan	2.7.1 CW1: Natural Sub Area This section states that the applicant "is willing to consider mechanisms such as appropriate deed restrictions, or conservation easements to memorialize this conservation zone." The Town of Ithaca encourages exploring deed restrictions or conservation easements to promote the permanent conservation of land where possible. This strategy should work in conjunction with the proposed PUD/PDZ language related to the Chain Works project.	26	The Town of Ithaca PB encourages exploring deed restrictions or conservation easements to promote the permanent conservation of land where possible. This strategy should work in conjunction with the proposed PUD/PDZ language related to the Chain Works project.	18	18M	Y	Y	2.7	Acknowledged. The Project Sponsor is proposing to preserve the CW1 (23.86 acres) Sub Area allowing those uses consistent with passive recreation to benefit the community. The related zoning restrictions within the PUD/PDZ are sufficient to accomplish that Project goal. The legal mechanism for preservation will be determined during Site Plan Review.
2.5-27	Site Program	Conceptual Site Layout Plan	2.7.2 CW2: Neighborhood General Sub Area Table 2.1.1 (Development Summary by Sub Area) on Page 2-3 of the DGEIS states that CW2 will have a total development of 568,400 square feet (all new buildings). Table 2.7.1 (also labeled Development Summary by Sub Area) confirms that number, and also notes that the entire development in CW2 would be residential. However, the text description of CW2, found on pages 2-20 and 2-21, indicates different numbers and uses for CW2.	27	Clarify why the description of CW2 Sub Area states that the development shall not exceed 700,000 sf versus the 568,400 sf in Table 2.1-1.	18	18N-1	Y	Y	2.7	These are two separate numbers in the DGEIS; the first (700,000 sf) is a threshold for the maximum development of the CW2 Sub Area and the second (568,400 sf) is the amount of Gross Floor Area depicted in the Conceptual Site Layout Plan.
2.5-27	Site Program	Conceptual Site Layout Plan	In terms of numbers, the third line in that paragraph states "the total area of all buildings within this Sub Area would not exceed 700,000 square feet." On page 2-21, the top paragraph goes on to explain that "the total gross square footage footprint of residential development in CW2 will not exceed 177,000 gross square feet" and that "639,475 gross square feet in CW2 are designated residential for the purposes of the analyzing the environmental impacts in the DGEIS." Should we assume that the 568,400 square foot "total development" refers to building footprint and the 700,000/639,475/177,000 gross square foot "total gross square footage footprint" refers to floor area? Please clarify.	27	Same as 27.	18	18N-3	Y	Y	2.7	Same as 27.
2.5-28	Site Program	Conceptual Site Layout Plan	Also, please clarify if the floor area numbers provided refer to the 4-story scenario or the 6-story scenario (noted at the bottom of page 2-20). Finally, if 177,000 gross square feet will be the maximum residential area proposed for CW2 ("will not exceed..."), then why analyze an additional 639,475 gross square feet for that area?	28	If 177,000 sf is the maximum residential area proposed for CW2 then why analyze and additional 639,475 sf? Clarify if the floor area numbers refer to the 4 or 6-story scenario.	18	18N-4	Y	Y	2.7	The total gross size of the footprint is 177,000 sf depicted on the Conceptual Site Layout Plan. This is not to be confused with the total GFA which is greater since there are multiple floors. The rationale for including footprint in the DGEIS is that it is one variable utilized in analyses such as stormwater impacts. The floor area numbers refer to the stories that are dedicated to the occupied use and do not include the stories dedicated to structured parking.

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2.5-29	Site Program	Conceptual Site Layout Plan	On Page 2-21, Section A-A of Figure 2-7.3: Section through CW2 and CW3 Sub Areas – this drawing is misleading to the reader, showing only buildings in CW2 that are 3-stories tall (two of them with underground parking), where the proposal is really for "a maximum of 4-stories for building heights exposed to NYS Route 96B," with "up to two additional stories allowed below the uphill grades first story."	29	Figure 2.7-3: Section through CW2 (Section A-A) is misleading showing only buildings in the CW2 that are 3-stories tall versus the allowable 4-stories with the up to two additional stories allowed below the uphill grade first story.	18	18O-1	Y	Y	2.7	Acknowledged. Figure 2.7-3 of the DGEIS is updated to depict the maximum development potential.
2.5-30	Site Program	Conceptual Site Layout Plan	All CW2 related tables and numbers should be revised to indicate the most accurate information about the uses, building areas/footprints/floor areas and accurate visual representations of building stories and heights.	30	All CW2 related tables and numbers should be revised to indicate the most accurate bulk and density information.	18	18O	Y	Y	2.7	Table 2.7-1 of the DGEIS provides a summary of the development within each Sub Area based on the Conceptual Site Layout Plan. This is a conceptual number only and is subject to change. The information in the table will be updated as necessary to accurately reflect the individual Site Plans proposed for approval.
2.5-31	Site Program	Conceptual Site Layout Plan	In general, building stories need to have a "not-to-exceed height" (floor to ceiling) noted for all Sub Areas, not just the CW3 (more comments related to CW3 below). As stated in our comments related to Adequacy, we maintain that the proposed heights of "4 stories plus 2 additional stories on the downhill side in CW2" is excessive.	31	Buildings stories need to have a "not-to-exceed height" for all Sub Areas. 4 Stories plus 2 additional stories on the downhill side in CW2 is excessive.	18	18O	Y	Y	2.7	The specific bulk and density requirements will be included in the City PUD and Town PDZ.
2.5-32	Site Program	Parking	2.7.3.2. Commercial This section states Buildings 17 and 18 will be converted to about 10,400 ft ² of restaurant/café and event café space. However, Table 5.7-4 (Project Generated Trips) uses 7,200 ft ² as the basis for restaurant trip generation. Which information is correct?	32	No Summary.	18	18R	Y	Y	2.7	Trip generation does not include structured parking in the GFA.
2.5-33	Site Program	Parking	2.7.3.5 Parking There are some confusing numbers for parking spaces on page 2-23. The second paragraph indicates that there will be an increase of 450-475 parking spaces from the "current 875 spaces." But the last paragraph in the section notes that there will be a "total of 675 parking spaces in CW3." Please clarify or correct if this is a typo.	33	No Summary.	18	18T	Y	Y	2.7	The description of the entire site parking is an increase of 450-475 spaces from the current 875 spaces for a total of approximately 1,325. Of which, there will be a total of 675 spaces located within the CW3.
2.5-34	Site Program	Parking	Some areas of the site plan are labeled with the total number of parking spaces. Please label all parking areas with total spaces per area for ease of review and provide analysis to verify that sufficient parking will exist for all land uses without need for long walking distances.	34	Please label all parking areas on the Conceptual Site Layout Plan with total number of parking spaces. Provide analysis to verify that sufficient parking will exist for all land uses without need for long walking distances.	21	21M	Y	Y	2.7	Acknowledged. The Conceptual Site Layout Plan is revised to depict parking areas with counts including structure parking as well as to ensure sufficient parking for each structure.
2.5-35	Site Program	Phase 1 Site Plan	Alignment of Gateway Trail should appear on Phase 1 Site Plans	35	No Summary.	1	1AC	Y	Y	2.7	Acknowledged. The Gateway Trail connection is included on the Conceptual Site Layout Plan as well as the Phase 1 Site Plans.
2.5-36	Site Program	Phase 1 Site Plan	A site plan should be provided illustrating what portion of the internal site circulation path and site access points will be developed with Phase 1 of development.	36	No Summary.	21	21X	Y	Y	2.7	Acknowledged.
2.5-37	Site Program	Phasing	2.1.1 Project Phasing The applicant has indicated that the actual phasing of the project may not follow the phasing noted in the DGEIS (e.g., Phase IV may be developed before Phase I). Any changing of phasing related to the project may require the submission of a supplemental EIS. This should be added to the Threshold chart found on page 10-2 in Chapter 10.	37	Changes to the Phasing sequence may require the submission of a supplemental EIS.	18	18E	Y	Y	2.7	The DGEIS states that the Phasing is not sequential and is presented only as a means of identifying sections of the development. The DGEIS emphasizes long term over short-term impacts as recommended in the NYSDEC SEQR Handbook. Since the DGEIS established cumulative thresholds for the entire Conceptual Site Layout Plan, changes to the phasing sequence alone would not require a Supplemental EIS.
2.5-38	Site Program	Project Population	When I first started thinking about looking at the DGEIS, I wanted to look at the little tiny details that we typically look at when we talk about planning. We think about population and traffic and zoning and so forth. In terms of that I do believe that the DGEIS does not go far enough in analyzing the population impacts for the residents there. It uses an analysis of two people per dwelling unit. But it does no -- it does provide no breakdown at all in terms of what the age of that population might be. And if you don't know the age of that population, therefore it doesn't project what kind of impact on the community it might have.	38	The population of the CWD should be broken down by age.	8	8B	Y	Y	2.7	As indicated in Chapter 5 of the SEQR Handbook, a GEIS is used to address broad planning questions. A Supplement EIS would be triggered if a significant adverse impact was not addressed. The further breakdown by age group beyond that currently presented is not useful nor helpful toward weighing the benefits of the Project against its potential significant adverse impacts.

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2.5-39	Site Program	Project Population	Rutgers University put out a report based on New York census data that says in housing complexes of more than five units for rent, a two bedroom generally houses 2.5 people and then it breaks down the distribution, how many are preschool age, how many are primary school age, how many 18 to 25, 25 to 45 and so on so you can come up with an idea of what your community will be and their needs. Based on that and the projected 1,830 bedrooms. Instead of a population of 18,030 -- actually no, I guess you would put one, instead of a population of 18,030, it would create a population of 2,300 individuals just about of which about 460 would be in primary school, 230 would be 18 to 24, 970 25 to 44, 311 between 45 and 64. 72 in the ages of 65 to 74. And 109 individuals age 75 or older. That helps us inform when we think about recreational resources.	39	A Rutgers University report based on NY Census data projects populations with age breakdowns and can inform population estimates.	8	8C	Y	Y	2.7	The citing of the Rutgers study is acknowledged however the purpose of the GEIS is to address broad planning questions. Therefore, the DGEIS utilizes an overall average of 2 bedrooms per unit and an estimate of 50 school (K-12) aged children based upon the Project Sponsor's projections. The Rutgers University report cited by the Commenter generalizes on a overall city scale and was not utilized in the development of the DGEIS. The actual development through the multiple Phases will be reviewed with the estimates presented in the DGEIS. Should thresholds based upon those projections be exceeded during the phased development (approximately 10 year) of the Project, the need for a Supplemental EIS will be evaluated by the relevant Lead Agency.
2.5-38	Growth Inducing Aspects	Housing Market Study	(cont'd)...nor is any analysis given of the age distribution of residents. The document is silent on estimates of new elementary, middle or high school aged residents or their impacts on the existing educational or recreational resources. Rutgers University Center for Urban Policy Research published the Residential Demographic Multiplier, Estimates of the Occupants of New Housing, 2006 to provide a foundation for estimating occupant demographics of new housing based on NY census data. It breaks down housing population and ages based on unit type -- rent or own, detached or multi-family, # of bedrooms, and rent. Population and age breakdown for all multifamily 2-bedroom rental units are higher than for similar units at the top of the rental bracket (assuming that \$2,370 in 2016 has an approximate value of \$1,970 in 2006 when adjusted for inflation). Please see the analysis of estimated population and ages below, first for all rents, and then for rents exceeding \$1,100 in 2006 dollars. (table)	38	Same as 38.	8	8M	Y	Y	8.3	Same as 38.
2.5-38	Community Services	Educational Facilities	The addition of ~ 46 middle school students would be an 8% increase over the current population of Boynton, and the addition of ~ 37 high school students would be a 2.3% increase over the current population of IHS. The impact on middle and high school resources are negligible.	38	Same as 38.	8	8P	Y	Y	5.11	Same as 38.
2.5-40	Site Program	Redevelopment of Existing Buildings	So first I think it's really important for me as a neighbor, I live at 333 Spencer Road in the City of Ithaca. I share a 410 foot property line with this project. One of the streams that runs through the project passes through our property, so things flow downhill. I think it's really important to say I think this is a great idea to redevelop this former industrial site into a mixed use property. One of the things I'm a little troubled about is the emphasis on new development outside the actual previously developed area and in particular the development to the south of the site that's currently wild. What I would like to know is if the emphasis of approvals is on the new outside the existing footprint of the buildings areas, what guarantee do we have as a community that the former industrial site will ever be developed?	40	There is too much emphasis on new development in the CW2 Sub Area and not enough on redevelopment of existing buildings.	5	5A	Y	Y	2.7	The DGEIS evaluates the general development of the Site as a whole as recommended in the SEQR Handbook. As per Table 2.1-1, the redevelopment of the existing buildings accounts for 815,450 sf or approximately 48% of the Project Sponsor's proposed maximum development of the Site. Therefore, development of both the new construction and existing buildings is planned. Phase 1 depicts redevelopment first and it is the intention of the Project Sponsor dependent on NYSDEC approvals.
2.5-40	Site Program	Redevelopment of Existing Buildings	But my principle concern is that the new portions would get developed and the existing structures would never get developed because we're talking about a huge sum of money here. And I believe your site plan and proposal emphasizes return on investment, which I don't have a problem with, but I would like to see the emphasis put on the existing structures as first steps and good indication of the ultimate development being responsible.	40	Same as 40.	5	5D	Y	Y	2.7	Same as 40.

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2.5-41	Site Program	Residential Uses	5.1.2.1 Response to the Goals of the City and Town Comprehensive Plans - To what extent will Chain Works accommodate family-friendly housing and amenities?	41	Describe how CWD provides family-friendly housing and amenities.	18	18Y	Y	Y	2.7	The Proposal will offer a variety of housing types including, one-, two- and three-bedroom apartments, as well as, townhouse-type units. These are all viable family-friendly housing options that are offered in successful, sustainable, denser, urban settings. The Proposal provides open outdoor courtyards and assembly areas within its boundaries and access to hiking trails and natural landscapes to the west and south. In addition, the Chain Works District will locate housing units within a ten-to-fifteen minute walk to the amenities offered by the City of Ithaca's downtown core (restaurants, parks, theaters, services, etc.). Family-friendly amenities will be developed during Site Plan Review.
2.5-42	Site Program	Residential Uses	Residentially diverse: Successful neighborhoods accommodate a diversity of residents at various stages of life. The proposed redevelopment does propose to do this. The proposal seems to include only rental housing and within a fairly narrow range of rents, and does not explicitly provide a mix of housing suitable for seniors, families, and others - all of which lead to a more dynamic and more attractive place to live.	42	The project should provide a mix of housing suitable for seniors, families, and others at various stages of life.	17	17F	Y	Y	2.7	According to the Project Sponsor, the majority of the units will be typical rental units with the potential of some of the townhouse units for sale in the CW2 Sub Area. The Project does not specifically target senior housing as that demographic is not part of the housing development's program. The CWD will be able to provide a variety of units, many of which will be suitable for families.
2.5-43	Site Program	Site Amenities	Public Realm: An active, engaging and safe public realm is central to a successful neighborhood. Comfortable sidewalks, public sitting and gathering places, street trees and other plantings, public art, and ground level, street front retail are all components of a public realm where people want to spend their time. Site redevelopment standards that incorporate these elements in the public realm of the new neighborhood should be incorporated in the proposed PUD zone.	43	An active, engaging and safe public realm is central to a successful neighborhood. Site redevelopment standards that incorporate sidewalks, public gathering spaces, structures, etc. in the public realm of the new neighborhood should be incorporated in the proposed PUD zone.	17	17E	Y	Y	2.7	The Conceptual Site Layout Plan includes several areas of public gathering spaces designated throughout the site with illustrative images demonstrating the intent. Thoroughfare standards define the public rights of way with emphasis on the pedestrian experience. Detailed public amenities will be developed as part of individual site plans for specific projects as they are proposed. The Planning Board will have the ability to review and advise on any proposed design and development of the public spaces as they are submitted overtime in lieu of including specific design standards. The GEIS evaluates the general development of the Site as a whole as outlined in the SEQR Handbook. Within the existing Chain Works District core structures there is approximately +/-1.7 acres (74,100sf) of dedicated open outdoor space and connections (including the Gantry Garden, Annealing Courtyard, Assembly Yard and Chain Drive). To the west the existing Buttermilk Falls State Park Trail will be extended north through the Proposal site and will be accessible to the public. To the west and to the south there is an additional +/-28.6 acres (1,245,000sf) of wooded area dedicated to remain as natural landscape for public use. Finally there are miscellaneous green spaces on the property that will also be available for public use (see attached Figure 2.3-2). Any additional dedicated outdoor space will be evaluated and determined on a project, building or use-specific basis through the site planning approval phase and as market-driven needs require.
2.5-43	Site Program	Site Amenities	Recreation: Although fostering improvements to the Gateway Trail and access to the South Hill School will allow for an increase in recreational opportunities for certain segments of the population at certain times it will likely not satisfy the needs of the diverse, large population the developer seeks to attract. We recommend the applicant explore developing recreational amenities, such as playgrounds and basketball courts, on-site to mitigate potential adverse public health impacts, create a positive living environment, and reduce potential impact on the surrounding neighborhoods. Such facilities could be located so as to help create a focal point for the neighborhood and be part of the public realm discussed above.	43	Same as 43.	17	17L	Y	Y	2.7	Same as 43.
2.5-43	Site Program	Site Amenities	Chapter 8: Growth Inducing Aspects and Character of Community - There are several areas within Chapter 8 of the DGEIS where there is missing information. For example: we are told in the "help document" provided by the applicant that section 8.1 (Community Character/Urban Form/Visual Impacts) satisfies the requirement to "Identify amenities provided by the Project for the community including restaurants, cafes, shops, open space network, circulation connections, and office spaces," but in fact that part of the DGEIS says almost nothing about the specific facilities that are envisioned for this space. A description that fulfills this requirement would specify projected locations, functions, floor space, seating capacity, and so on.	43	Same as 43.	18	18AZ	Y	Y	2.7	Same as 43.

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X-Reference	Comment Category	Comment Subcategory	Comment	Comment Summary No.	Summary of Comment	Commenter ID	Comment ID	Sub.	Rel	Relevant DGEIS	Response to Comment
2.5-43	Site Program	Open Space	The DGEIS talks about CW1 as being an open green space, but makes no mention of recreational resources that would support 480 primary school individuals that would be living on the site or 230, 18 to 24 year olds. What kind of playground, green space, soccer fields. A population of 2,030 individuals is probably the entire population of the flats of which we have several parks, several playgrounds and several community areas and supports and we have replicated that here and the DGEIS has not described how it would mitigate the need for recreational space for the population it will have.	43	Same as 43.	8	8D	Y	Y	5.12	Same as 43.
2.5-43	Site Program	Site Amenities	5.12 Open Space/Recreation The DGEIS mentions the trail opportunities on the property, but nothing about the possibility of park or open space land within the development. The DGEIS also doesn't mention the development of playgrounds or any other facilities for young kids. Please provide more information on what open space and recreation facilities the project will actually provide.	43	Same as 43.	18	18AX	Y	Y	5.12	Same as 43.
2.5-43	Site Program	Site Amenities	Section 8.1 satisfies the requirement to "Identify amenities provided by the Project for the community including restaurants, cafes, shops, open space network, circulation connections, and office spaces," but in fact that part of the DGEIS says almost nothing about the specific facilities that are envisioned for this space.	43	Same as 43.	2	2G	N	N	8.1	Same as 43.
2.5-44	Site Program	Site Amenities	2.6.2 Connectivity This section has one of several statements in the DGEIS claiming the project will "enable the construction of the Gateway Trail." However, the trail needs to be on the ground to realize its connectivity and amenity benefits. The impact of Chain Works will increase demand for the trail, but the DGEIS has no specifics about how the project will help meet that demand.	44	The DGEIS claims the project will "enable the construction of the Gateway Trail." However, the trail needs to be on the ground to realize its connectivity and amenity benefits.	18	18H	Y	Y	2.7	The Project Sponsor has actively sought to bring the City, Town and the current Property Owner together to finalize the agreement that will allow construction of the Gateway Trail. The Applicant will incorporate the cooperatively developed Gateway Trail project in the corresponding Site Plan drawings. If the Gateway Trail is not developed, other Site connectivity described in the DGEIS will provide mitigation to the extent possible.
2.5-45	Site Program	Site Amenities	As noted earlier, there are several vague statements in the DGEIS regarding the construction of the Gateway Trail, but with no commitment as to how the trail will be constructed. Will the developer put money towards the trail development? Related to the Gateway trail, the DGEIS notes in Section 5.12.4.1, page 5-230 and 5.12.4.2, page 5-231 that the Gateway Trail either wouldn't happen or would be unlikely, which are incorrect statements to make. A different future owner could grant an easement for the trail; Emerson as the current owner could grant an easement, or the Town and City could use eminent domain at any point to put the trail in. The Chain Works project is not the only way the Gateway Trail is going to happen.	45	There are several vague statements in the DGEIS regarding the construction of the Gateway Trail, but with no commitment as to how the trail will be constructed. The gateway trail could be constructed without the Project.	18	18AY	Y	Y	5.12	Same as 44.
2.5-46	Site Program	Supportive of Project	The proposed redevelopment of the Chain Works industrial property in Ithaca offers a unique opportunity to transform an area in and adjacent to the City of Ithaca. At 95 acres and with 915 proposed housing units and anticipated 1500 jobs, the Chain Works property will be the equivalent of a new city neighborhood. When establishing a new urban neighborhood it is important to think about the planning and design principles that help support successful neighborhoods. The proposed redevelopment addresses some of these quite well, and others not as well. The City and the Town should consider these principles as they establish the PUD zoning requested by the developer. The proposal addresses several important neighborhood planning and design principles very well. 1. Compact and multiuse: The proposed redevelopment does include a range of mutually supportive uses, including neighborhood-scale retail and services, offices, and residential uses combined and integrated in a compact form. 2. Businesses and services. The proposal concentrates the proposed businesses and services in one area, making it easy for residents to accomplish several tasks on a single trip. 3. Green Infrastructure: The proposed redevelopment would protect 24 acres of natural lands and ties into the proposed urban area trail system.	46	The proposed redevelopment of the Site will be a transformative project. The City and Town should use planning and design principles to establish PUD zoning.	17	17B	N	Y	2.7	Acknowledged.
2.5-47	Site Program	Supportive of Project	Thank you for offering us the opportunity to comment on the Draft Generic Environmental Impact Statement (DGEIS) for the above referenced project. The proposed redevelopment of a brownfield site within the urban core of the County supports many of the principles and policies of the 2015 Tompkins County Comprehensive Plan including to "promote more housing and mixed-use development in Development Focus Areas."	47	The Project supports the principles and policies of the 2015 Tompkins County Comprehensive Plan.	17	17A	N	Y	2.7	Acknowledged.

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2.8-1	SEQR	DGEIS Format	Between 2.7.3.4 and 2.7.3.5 A section titled "Recreation" is called for in the Scope (2.5.5, p. 12) between DGEIS 2.7.3.4 (Common Areas, Open Space and Other Facilities and Services) and 2.7.3.5 (Parking), but there appears to be no such section. It is claimed that this is addressed by 2.7.1 (p. 2-19), but the scoping requirement that "This subsection of the DGEIS will describe where the recreation areas will be located within the Chain Works District, potential square-footage, and types of recreational amenities and activities" is not well satisfied with specifics, and no square footage estimates appear at all.	1	A section titled "Recreation" is called for in the Scope (2.5.5, p. 12) between DGEIS 2.7.3.4 (Common Areas, Open Space and Other Facilities and Services) and 2.7.3.5 (Parking), but there appears to be no such section.	18	18S	Y	Y	2.8	6 NYCRR 617.10 states that Generic Environmental Impact Statements (GEIS) are "broader and more general" and should discuss the "logic and rationale for the choices advanced". It was determined by the Lead Agency during the development of the DGEIS that the recreation section would be combined under "Common Areas, Open Space and Other Facilities and Services" under each Sub Area. Additional data on the approximate square footage will be added to the DGEIS.
2.8-1	SEQR	DGEIS Format	Other requirements on the list in the scoping document do appear to be addressed to some extent, but even here there is the suspicion that a lot more detail could have been provided.	1	Same as 1.	2	2J	N	N	2.8	Same as 1.
2.8-1	SEQR	DGEIS Format	Scoping document 2.5.5 (p. 12): A section titled "Recreation" is called for between DGEIS 2.7.3.4 (Common Areas, Open Space and Other Facilities and Services) and 2.7.3.5 (Parking), but there appears to be no such section. It is claimed that this is addressed by 2.7.1 (p. 2-19), but the scoping requirement that "This subsection of the DGEIS will describe where the recreation areas will be located within the Chain Works District, potential square-footage, and types of recreational amenities and activities" is not well satisfied with specifics, and no square footage estimates appear at all.	1	Same as 1.	2	2A	N	Y	2.8	Same as 1.
2.8-2	SEQR	DGEIS Format	The Chain Works District proposal includes construction of 900+ residential units described as "market rate housing opportunities". Approximately half are slated to be located in the City of Ithaca and the remainder in the Town of Ithaca. It seems reasonable to speculate that the addition of such a large number of high-end residences to the existing housing stock of both municipalities is likely to result in a number of potential environmental impacts, both positive and negative.	2	There will be an impact on the existing housing stock with the addition of 900+ high-end residential units.	3	3A	N	Y	2.8	As outlined in 6 NYCRR 617.10, the purpose of the DGEIS is to address potential environmental impacts of the entire development, not just the residential units as outlined in Chapter 5. Environmental impacts for the whole development have been addressed. The Project Sponsor is offering a range of housing. See response to Comment Summary 96.
2.8-3	SEQR	DGEIS Format	All other chapters of the DGEIS relating to potential environmental impacts include specific sections presenting "Potential Impacts," "Mitigation Measures" and "Alternatives to Proposed Action". Chapter 8: Growth Inducing Aspects and Character of Community (DGEIS) does not contain any of these sections. It appears, therefore, that the applicant has made no attempt to specifically identify any potential negative environmental impacts, to suggest an appropriate mitigation plan nor to put forth any alternatives for the residential portion of this project. Given the goals of the scoping process and the subsequent drafting of the DGEIS, it seems that the omission of this summary analysis is a glaring error and leaves DGEIS Chapter 8, Section 8.3 and Section 8.4 substantially incomplete. If, for some technical reason, the applicant is not required to provide this analysis for the above Sections of DGEIS Chapter 8, then it is even more imperative that the currently inadequate information, both in terms of depth and appropriate type/source, as described above, be supplemented so that readers have the data necessary to draw their own conclusions concerning potential negative environmental impacts of the proposed project and how they might be best mitigated.	3	The Chapter 5 formatting should be extended to Chapter 8.	3	3H	N	N	2.8	As outlined in the SEQR Handbook, there is no particular format required for the DGEIS as long as the required "fundamental" elements are presented. Chapter 5 is the only chapter that is split into the three sections. This is typical for standard EIS format. SEQR regulations only require an overview discussion on Growth Inducing Aspects and Character of the Community. Therefore, the discussion in the DGEIS on these topics are sufficient.
2.8-3	SEQR	DGEIS Format	Potential Impacts/Mitigation Measures/Alternatives to Proposed Action All other chapters of the DGEIS relating to potential environmental impacts include specific sections presenting "Potential Impacts," "Mitigation Measures" and "Alternatives to Proposed Action". Chapter 8: Growth Inducing Aspects and Character of Community (DGEIS) does not contain any of these sections. It appears, therefore, that the applicant has made no attempt to specifically identify any potential negative environmental impacts, to suggest an appropriate mitigation plan or put forth any alternatives for the residential portion of this project. Given the goals of the scoping process and the subsequent drafting of the DGEIS, it seems that the omission of this summary analysis is a glaring error and leaves DGEIS Chapter 8, Section 8.3 and Section 8.4 substantially incomplete. If, for some technical reason, the applicant is not required to provide this analysis for the above Sections of DGEIS Chapter 8, then it is even more imperative that the currently inadequate information, both in terms of depth and appropriate type/source, as described above, be supplemented so that readers have the data necessary to draw their own conclusions concerning potential negative environmental impacts of the proposed project and how they might be best mitigated.	3	The Chapter 5 formatting should be extended to Chapter 8.	18	18BJ	Y	Y	2.8	Same as 3.

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2.8-4	SEQR	DGEIS Format	Type/Sources of Information Presented- Secondary (i.e. previously gathered) data sources referenced but not compiled in a comprehensive bibliography or reference list (e.g. 2013 ACS, Housing Needs Assessment, 2006, etc.). Without such a list, the reader is left with the burdensome task of looking up each of the referenced sources in order to determine their existence and assess their content. See the 40+ page Historic and Archaeological Resources, Appendix H of the DGEIS for an example of a bibliography of appropriately referenced secondary sources that were used whole or in part as the basis for drawing conclusions concerning potential impacts and suggested mitigation.	4	A bibliography should be added to the DGEIS.	18	18BH	Y	Y	2.8	A bibliography will be added to the DGEIS.
2.8-5	Character of Community	Housing Market Study	Secondary (i.e. previously gathered) data sources referenced but not compiled in a comprehensive bibliography or reference list (e.g. 2013 ACS, Housing Needs Assessment, 2006, etc.). Without such a list, the reader is left with the burdensome task of looking up each of the referenced sources in order to determine their existence and assess their content. See the 40+ page Historic and Archaeological Resources, Appendix H of the DGEIS for an example of a bibliography of appropriately referenced secondary sources that were used whole or in part as the basis for drawing conclusions concerning potential impacts and suggested mitigation.	5	Secondary (i.e. previously gathered) data sources referenced but not compiled in a comprehensive bibliography or reference list (e.g. 2013 ACS, Housing Needs Assessment, 2006, etc.).	3	3F	Y	Y	2.8/8.3	Same as 4.
2.8-6	SEQR	DGEIS Format	Chapter 1.3 SEQR Review Agencies a. Please add the City of Ithaca Board of Public Works as an Involved Agency - The project will impact the City's infrastructure in terms of traffic, water, sewer, and bicycle/pedestrian needs. The BPW is charged with overseeing present and future conditions and demands on our infrastructure, and should be included as an involved agency with input into the DGEIS.	6	Please add the City of Ithaca Board of Public Works as an Involved Agency.	8	8Q	Y	Y	2.8	The Lead Agency included the City of Ithaca BPW as an Involved Agency during Scoping.
2.8-7	SEQR	DGEIS Format	b. Please add the Ithaca City School District as an Interested Agency - As this is a residential project of significant size, it may have direct and indirect impacts on population demographics for primary school aged children, and thus ICSD should be listed as an interested agency.	7	Please add the Ithaca City School District as an Interested Agency.	8	8R	Y	Y	2.8	The Lead Agency included the Ithaca City School District as an Interested Agency during Scoping.
2.8-8	SEQR	DGEIS Process	Hi. My name is Rich DePaolo, a resident of Town of Ithaca. I'm also on the Town of Ithaca board. I'm speaking tonight as a citizen and also as a board member, but not on behalf of the Town of Ithaca. I finally got an opportunity to start reading the EIS and supportive documents today. And I foolishly took it upon myself to add up the total number of pages supplied on the flash drive last Thursday. There are over 80,000 pages including the appendices to the Phase 1 and Phase 2 Environmental Site Assessment. So first I'll say that I would hope that the developer would be open to the idea of requesting an extension to the comment period because I don't think it's realistic to expect residents and municipalities to provide substantive and comprehensive public comment in a 60-day timeframe when we're talking about literally thousands and thousands of pages of material. I did not get past chapter five today.	8	The DGEIS is too voluminous to review within the 60-day SEQR timeframe.	6	6A	Y	Y	2.8	The Lead Agency acknowledged this comment and extended the comment period an additional 15 days.
2.8-8	SEQR	DGEIS Process	And so I'm stuck because I know we have 60 days. There's a lot to look at. There's a lot to analyze. There is a lot I do want to talk about, but I'm not quite sure where to go from there. I will echo Rich's request to extend that 60-day comment period. Not only in looking at the regular planning, traffic, population, all of these other impacts, environmental impacts as it was mentioned here earlier today there were at least, if I can tell, 15 new areas of concern that are delineated and outlined in the DGEIS which will, which will need and can benefit from a closer look and we will need additional time just to look at those things. 60 days might have worked for a regular development, but this is a whole different kettle of fish and it deserves a longer period of comment and input.	8	The DGEIS is too voluminous to review within the 60-day SEQR timeframe.	8	8F	Y	Y	2.8	Same as 8.
2.8-8	SEQR	DGEIS Process	Thank you. Like Cynthia, I represent the first ward in the City of Ithaca which includes South Hill. And I won't repeat what has already been said, but I will say I agree with extending the comment period past 60 days.	8	The DGEIS is too voluminous to review within the 60-day SEQR timeframe.	9	9A	Y	Y	2.8	Same as 8.
2.8-9	SEQR	DGEIS Format	Scoping document chapter 6: I note that the material covered in this chapter of the scoping document has been split up and dealt with under the headings in DGEIS chapter 5; this seems like a good idea to me.	9	No Summary.	2	2E	N	Y	2.8/5	Acknowledged.

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5.1-1	Zoning	Design Guidelines	These particular drawings, when it comes to the part of the city that I represent, I have to say I'm shocked at how dense and tall these apartment buildings are. This is a neighborhood of single family homes and you're proposing putting six story apartment buildings in people's backyards. I think that is out of line and I think they will too. Thank you	1	Six story buildings in the City are too tall.	9	9C	N	Y	5.1	The ability to utilize six-story buildings under the PUD/PDZ will allow CWD to be developed in accordance with LEED ND. The intent is to create a dense and vibrant neighborhood and six-story buildings help to achieve those goals in a manner consistent with more urban, city environments.
5.1-2	Zoning	Design Guidelines	Design Standards – how do they address compatibility with existing historic structures and off site residential development?	2	No Summary.	1	1T	Y	Y	5.1	PUD/PDZ addresses building form and disposition on the Site. Compatibility is a subjective term and individual projects will be reviewed by the respective Planning Board.
5.1-3	Zoning	Design Guidelines	The development in CW-2 reads like 'suburban apartment complex' rather than a neighborhood- your specifically state that your vision is to create the later and avoid the former.	3	No Summary.	1	1U	Y	Y	5.1	The vision of Chain Works District is to develop a mixed-use district through the reclamation and revitalization of existing structures and new areas of development. The proposed development on the CW2 project site is guided by best practices as set forth by LEED-ND guidelines as they relate to development density goals, site access (and accessibility) and limitations of building construction on existing sloping sites. The CW2 subarea is comprised of large areas of sloping land in excess of 20% - limiting the land area which can be developed in this zone. The extent of the proposed configuration minimizes construction on steep slopes and strives to build on land that has less than a 20% slope. It is envisioned that existing and new structures will develop a cohesive neighborhood (or "district") via complementary programmatic uses, density of development, a variety of building scales and massing and the establishment of unifying Design Standards and aesthetics.
5.1-4	Zoning	Design Guidelines	5.1.3.1 Potential Impacts to Zoning "The new development will take on a cluster form avoiding environmentally and visually sensitive areas." Paragraph should indicate whether "visually sensitive areas" include the valley/lake view from Rt. 96B and viewshed impacts on surrounding hills and valleys.	4	Do "visually sensitive areas" cited in Section 5.1.3.1 include the valley/lake view from Rt. 96B and viewshed impacts on surrounding hills and valleys?	15	15B	Y	Y	5.1	Yes. See Section 5.10 of the DGEIS for a complete list of views required in the original Scoping.
5.1-5	Zoning	Design Guidelines	5.1.4.2 Mitigation to Form and Intensity of Uses "Buffers will be maintained in areas adjacent to existing residential zones to control the intensity of development." Buffers should also be maintained in areas adjacent to natural areas to prevent impingement of development on green space.	5	Buffers should also be maintained in areas adjacent to natural areas to prevent impingement of development on green space.	15	15C	Y	Y	5.1	The designation of the open natural areas that could otherwise be developed is in essence the buffer. The Project Sponsor is not proposing additional buffers to natural areas that will not be developed.
5.1-6	Zoning	Design Guidelines	5.1.4.3 Mitigation to Form and Intensity of Uses "The Design Standards effectively prevent the development of the CW1 Sub Area. There is no proposed specific mitigation for this Sub Area because the preservation of this land as a natural area is in fact part of the proposed mitigation for the other Sub Areas." Paragraph should reference whether design standards will apply to accessory buildings envisioned for CW1 Sub Area.	6	The Zoning discussion should reference whether design standards will apply to accessory buildings envisioned for CW-1 Sub Area.	15	15D	Y	Y	5.1	Design standards do not apply to CW1 because the only permitted building types have no relationship to a dense, diverse, walkable urban form. Any potential buildings in the CW1 would require design review by the Planning Board prior to approval.
5.1-7	Zoning	Design Guidelines	Where new buildings are proposed, the Planned Unit Development zoning should establish design guidelines to help support the quality of the neighborhood experience.	7	Design guidelines should be established to support the PUD.	17	17D	Y	Y	5.1	Planning Boards have discretion for allowing a wide variety of architectural styles to create a diverse and high quality neighborhood experience.
5.1-8	Zoning	Design Guidelines	Visual Impacts: To help mitigate visual impacts of the proposed new development the applicant should be required to explore the use of landscape buffers and muted earth tones on building exteriors as part of this DGEIS.	8	To help mitigate visual impacts of the proposed new development the applicant should be required to explore the use of landscape buffers and muted earth tones on building exteriors as part of this DGEIS.	17	17K	Y	Y	5.1	The proposed conceptual site plan considers landscape buffers both along the outside perimeter of the Proposal boundary (between the Chain Works District and the surrounding existing context to the north, west and south) and within the Proposal boundary itself. Visualizations developed and included in Chapter 5 do not indicate tree lines that would provide visual buffers between buildings (which will/would effectively reduce perceived building heights from various viewpoints). This was visualization approach was taken in order to clearly (and transparently) represent the height of the proposed structures. The color palette of building exteriors can be reviewed when individual projects are submitted for / during the established design and construction approval process for the Chain Works District.

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5.1-9	Zoning	Design Guidelines	2.7.3 CW3: Neighborhood Center Sub Area We acknowledge that portions of this Sub Area are located in the City of Ithaca and portions are located in the Town of Ithaca. We also acknowledge that this Sub Area contains a large mix of proposed uses, from residential to industrial, to be located in existing and proposed buildings. That is why the city and town specifically indicated in their comments related to Adequacy that there should be special consideration related to the proposed heights and designs of new buildings that will be constructed along the Aurora Street/NYS Route 96B frontage in the CW3 Sub Area. We suggested changing the Sub Area designation along this corridor to CW2, thereby limiting the uses to residential and the building heights to a maximum of 4 stories (or shorter, with much lower than 24-foot story heights). We maintain that the proposed heights of "6 stories plus additional 2 stories" in CW3 is particularly excessive along Aurora Street/NYS Route 96B, especially when the story height of any new building is proposed to be "limited to 24-feet" (DGEIS page 2-23, second paragraph, last line). Regarding the same, we also recommended revising the PUD-PDZ language to show design and architectural standards that would be unique to the Aurora Street/NYS Route 96B frontage. Alternately, we suggested creating a new defined area that pertains only to the Aurora Street/96B frontage and contains its own set of architectural design requirements that would include a variety of architectural styles, so new development blends in appropriately with the variety of styles that exist along Aurora Street/NYS Route 96B. Homogenous and/or institutional style architecture could negatively affect the character of the corridor. The DGEIS did not consider any of the above suggestions or recommendations that were in the Town of Ithaca's Adequacy comments.	9	We suggested changing the Sub Area designation along the NYS Route 96B corridor to CW2, thereby limiting the uses to residential and the building heights to a maximum of 4 stories (or shorter, with much lower than 24-foot story heights). We also recommended revising the PUD-PDZ language to show design and architectural standards that would be unique to the NYS Route 96B frontage. Alternately, we suggested creating a new defined area that pertains only to that corridor and contains its own set of architectural design requirements.	18	18Q	Y	Y	5.1	Acknowledged. To accommodate the intent of the comment, the buildings within a 100-foot buffer along NYS Route 96B will be limited to a maximum of 4 stories as required in the PUD/PDZ Regulations and Design Guidelines. The Sub Area 3 has been split into Sub Area 3A and 3B, which is depicted in the Guidelines.
5.1-10	Zoning	Design Guidelines	Regarding the conceptual designs shown for the structures in the photos on pages 5-171, 5-183, 5-190 and 5-192, we want to reiterate that the city and town specifically indicated in their comments related to Adequacy that there should be special consideration related to the proposed heights and designs of new buildings that will be constructed along the Aurora Street/NYS Route 96B frontage in the CW3 Sub Area. We suggested creating a new defined area that pertains only to the Aurora Street/96B frontage and contains its own set of architectural design requirements that would include a variety of architectural styles, so new development blended in appropriately with the variety of styles that exist along Aurora Street/NYS Route 96B. Homogeneous and/or institutional style architecture could negatively affect the character of the corridor.	10	Regarding the conceptual designs shown for the structures in the photos on pages 5-171, 5-183, 5-190 and 5-192, we want to reiterate that the city and town specifically indicated in their comments related to Adequacy that there should be special consideration related to the proposed heights and designs of new buildings that will be constructed along the Aurora Street/NYS Route 96B frontage in the CW3 Sub Area.	18	18AV	Y	Y	5.1	See Response to Comment #5.1-9.
5.1-11	Zoning	Design Guidelines	2.7.4 CW4: Industrial Sub Area The repurposing of the existing industrial buildings seems appropriate for this Sub Area, as does the proposed increase in height. We understand that the story height noted in the last line of the first paragraph under this section on page 2-31 ("story height will not exceed 30 feet") refers to the first story of the existing buildings only. However, this should be clarified.	11	We understand that the allowable story height of up to 30 feet in the CW4 Sub Area is for the first story of existing buildings only. Please confirm.	18	18U	Y	Y	5.1	That is correct as outlined in the PUD/PDZ.
5.1-12	Zoning	Design Guidelines	5.1.4.3 Design standards- On page 5-16, for the CW4 Subarea, the DGEIS states "The impact on the neighboring properties and the other zoning districts is anticipated to be minimal as the result of the clearly defined Sub Areas and Design Standards to be set in place as a result of this project." However, the conceptual PDZ regulations have no performance standards, buffering or screening requirements, or other standards that would help mitigate the impact of potentially intensive industrial uses near residential areas. Mitigation must be a part of any PDZ standards the Town adopts.	12	The conceptual PDZ regulations have no performance standards, buffering or screening requirements, or other standards that would help mitigate the impact of potentially intensive industrial uses near residential areas.	18	18AA	Y	Y	5.1	There is buffering built into the Conceptual Site Layout Plan to protect adjacent residential uses at a distance greater than what is allowed under the current industrial zone. The separation of industrial and residential uses is prescribed through the Conceptual Site Layout Plan itself with a range of housing options provided in various proximities to other mixed-uses. Buffering will be assessed during Site Plan Review.
5.1-13	Zoning	Land Use	5.1.3.1 Potential Impacts to Zoning "Environmentally valuable areas would be preserved and protected as an amenity for the neighborhood and surrounding community." "Environmentally valuable areas" should be identified. It is not clear whether the paragraph refers to on-site areas or ancillary benefits related to reducing development pressure on surrounding areas. On-site and adjacent areas potentially impacted by contamination should not be categorized as "environmentally valuable" unless they are known to be in compliance with regulatory cleanup standards.	13	Environmentally valuable areas should be identified. On-site and adjacent areas potentially impacted by contamination should not be categorized as "environmentally valuable" unless they are known to be in compliance with regulatory cleanup standards.	15	15A	Y	Y	5.1	The CW1 subarea was developed to protect the environmentally valuable areas and the older, more valuable forest as outlined in DGEIS Section 5.4. Steep slope areas have also been identified in Figure 5.2-2 of the DGEIS.

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5.2-1	Land	Surface Geology	5.2.1.1 Surface Geology - The USDA Soil Survey Map and accompanying description of the soils on the site indicate that there are highly erodible soils in the areas within and around Sub Area CW2. Page 5-20 of the DGEIS states that soil type LtB should "remain in some type of vegetation to reduce erosion," and that soil type LtC could "produce rapid stormwater runoff," and "should remain in vegetation as a protection against erosion." However, these are the exact same areas where new high density housing and development is being proposed. The DGEIS acknowledges this in one paragraph on page 5-23, where it explains that Sub Area CW2 contains the highest concentration of new development in the project while simultaneously containing the highest potential for soil erosion due to the soils and slope. The proposed mitigation related to developing Sub Area CW2 is vague (page 5-24) and generally mentions submission of grading, geotechnical and excavation plans for each Phase beyond Phase I. This is appropriate for a Generic Environmental Impact Statement, especially since CW2 is part of Phase IV. However, additional studies, including a possible supplemental EIS, may eventually be required for the CW2 Sub Area in order to adequately evaluate the actual development limitations in that Sub Area related to soils and slopes. Please also refer to the LEED standards related to slope preservation: http://www.usgbc.org/credits/ss53	1	The USDA Soil Survey Map and accompanying description of the soils on the site indicate that there are highly erodible soils in the areas within and around Sub Area CW2. However, additional studies, including a possible supplemental EIS, may eventually be required in order to adequately evaluate the actual development limitations related to soils and slopes	18	18AB	Y	Y	5.2	The in-situ soils in the CW2 Sub Area are highly erodible. Appropriate standard mitigation measures are outlined in the DGEIS which follow the SPDES General Construction requirements in New York State. Based on this information, soil stabilization in these soils can be performed with green and hardscape measures to mitigate adverse impacts. Nonetheless, these issues will be evaluated in detail at the Site Plan Review stage of development to ensure appropriate mitigation. This mitigation can include detailed grading plans, erosion and sediment control measures, the development of a Full SWPPP and geotechnical investigations/recommendations. A Supplemental EIS would only be required if appropriate mitigation cannot be implemented.
5.3-1	Water Resources	Stormwater	Please find below my comments on storm water management as outlined in the March 8, 2016 Chain Works dGEIS. Chapter 5.3.1.1 (page 5-27) Surface Water and Hydrogeological Setting. dGEIS Statement: A historical incident of flooding occurred in March 2011. The property of Jennifer Cleland, located on Spencer Street, experienced water flowing across her property during a prolonged, intense rain event. The on-site, unnamed tributary south of the developed portion of the Site (POS-E) had filled with stone and silt. This caused the unnamed tributary to overflow its banks and the runoff flowed to the base of the hill, crossing Ms. Cleland's property. The unnamed tributary was cleaned of all sediment on October 2011, and there have not been any additional incidents of flooding. This unnamed tributary receives surface water runoff from the Site and upstream properties including Ithaca College.	1	A historical incident of flooding occurred in March 2011. The property of Jennifer Cleland, located on Spencer Street, experienced water flowing across her property during a prolonged, intense rain event. The on-site, unnamed tributary south of the developed portion of the Site (POS-E) had filled with stone and silt. This caused the unnamed tributary to overflow its banks and the runoff flowed to the base of the hill, crossing Ms. Cleland's property.	8	8H	Y	Y	5.3	Acknowledged. This is documented in the Generic SWPPP as an existing condition. This Project provides an opportunity to improve maintenance of the unnamed stream that traverses the Site which in turn will reduce the chances of plugged drainageways causing flooding to downstream properties. All upstream and downstream stormwater facilities will be reviewed for capacity during the individual Site Plan Reviews. The proposed stormwater mitigation also includes a SWPPP for the entire site that requires ongoing Qualified Professional inspections/maintenance of all stormwater facilities. The SWPPP also provides the opportunity to provide further mitigation such as green practices, stormwater controls and runoff reduction.
5.3-2	Water Resources	Surface Water	The "unnamed" Class "2" Stream that runs through TM 123-3-1 traverses and drains CW-1 and CW-2, the CWD north of them, and probably a vast area of South Hill up to at least the King Rd. intersection. In major rain events where 3-5 inches fall within a short period of time, it has been the source of significant property damage to 333 Spencer Rd. for the past 36 years. On four occasions, from 1980 until 2000, the stream flow exceeded the capacity of the culvert at the bottom of our driveway and the stream blasted out of the stream bed, tossing boulders and 6" x 2' x 4' blocks of sandstone that form a retaining wall directing the flow south parallel to Spencer Rd. Extensive damage to the bottom of our drive made it impassable on two occasions until the City cleared the culvert and temporarily patched the drive with the dredged material.	2	The "unnamed" Class "2" Stream that traverses and drains CW-1 and CW-2 has been the source of significant property damage to 333 Spencer Rd. for the past 36 years. On four occasions, from 1980 until 2000, the stream flow exceeded the capacity of the existing culverts.	14	14A	Y	Y	5.3	Same as 1.

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5.3-3	Water Resources	Stormwater	On October 13, 2013, I (Cynthia Brock) sent a letter to the City of Ithaca Planning Board with regard to the ongoing stormwater issues of the property impacting homes and properties downgradient at 333 Spencer Road, Ithaca. The letter stated: "I am requesting that the Planning & Development Board require, as a condition to be fulfilled prior to the approval of the subdivision, that the applicant install adequate and acceptable stormwater management systems in accordance with municipal standards, as allowed under NY GCT Law §33(2)(c). As an alternative to the requirement of the installation of adequate and acceptable stormwater management systems, prior to Planning and Development Board approval, a performance bond or other security sufficient to cover the full cost of the same, as estimated by the Planning & Development Board or department designated by the Planning & Development Board shall be furnished to the City of Ithaca by the applicant, as allowed under NY GCT Law §33(8)(a). Please see the below video of water flowing through the driveway of 333 Spencer Road. http://www.flickr.com/photos/56518850@N05/9723036039/ Over the past several years, 333 Spencer Road, the property immediately down gradient of the established stream/channel on Emerson's property, has been experiencing storm water runoff and property damage during high rain events as a consequence of storm water jumping the banks of the established swale on Emerson's property and redirecting onto 333 Spencer Road. The above photo was created by Scott Gibson, the City's Stormwater Management Officer, on 18 October 2013. Please also see the prior report produced by Scott Gibson and Ray Benjamin dated 5 October 2010, attached. Ongoing communication over the years between the property owners Cleland and Stundtner and Emerson Power Transmission, in addition to appeals to the City and the City's Board of Public Works (October and November 2010) have been unsuccessful in securing a remedy to 333 Spencer Road for the tremendous negative impact of storm water runoff. NYGCT Law §33 specifies that the before the approval of the Planning & Development Board, the Board shall require that the land be of such character that it can be safely used for building purposes without drainage or other menace to neighboring properties or the public health, safety and welfare. I respectfully request that the Planning & Development Board require, as a condition to be fulfilled prior to the approval of the subdivision, that the applicant install adequate and acceptable stormwater management systems in accordance with municipal standards, as allowed under NY GCT Law §33(2)(c).	3	The Planning & Development Board should require, as a condition to be fulfilled prior to the approval of the subdivision, that the applicant install adequate and acceptable stormwater management systems in accordance with municipal standards, as allowed under NY GCT Law §33(2)(c). As an alternative to the requirement of the installation of adequate and acceptable stormwater management systems, prior to Planning and Development Board approval, a performance bond or other security sufficient to cover the full cost of the same, as estimated by the Planning & Development Board or department designated by the Planning & Development Board shall be furnished to the City of Ithaca by the applicant, as allowed under NY GCT Law §33(8)(a).	8	8I	Y	Y	5.3	The Commenter references NY GCT Law §33 which pertains only to Subdivisions. The Project does not include a Subdivision action. However, the Project will follow all City and Town development regulations as part of the individual Site Plan approvals as required. The Project Sponsor will implement an "adequate and acceptable" stormwater management system in accordance with the current NYSDEC Stormwater Management Design Manual at the time of submission of the Site Plan application for an individual phase. Even though performance bonding is not required, the associated NYSDEC SPDES permit requires implementation. The SPDES permit has adequate enforcement measures as outlined in the NYSDEC SPDES General Permit for Stormwater Discharges (GP-0-15-002).
5.3-3	Water Resources	Stormwater	Since 2000, there have been three more storm occasions when the stream jumped its bed within the CWD. This sent 3-4 inches of flow through the property immediately south of us then topography turned it back north into our property flowing down our driveway. The short video at https://www.flickr.com/photos/56518850@N05/albums/72157635484257160 shows the flow well after the storm had passed and does not represent max flow. There is a second video showing the condition at the culvert under the old rail ROW much later. This is caused by large quarried blocks of stone that form the southern edge of the existing artificial hillside of the developed portion of the CWD sliding into and diverting the stream flow. Under normal circumstances this doesn't manifest itself downhill. This nuisance may be considered public and/or private. The matter was brought to the attention of the Emerson facilities staff and we met onsite to review it. They were noncommittal with next steps. At an early CWD public meeting, we learned that Emerson claimed to have corrected the issue. Their remediation consisted of moving relatively light material to the southern edge of the stream bed to build it up. There hasn't been a recent rain event to test the effort. Material continues to accumulate and some diversion may still be occurring, just not at a rate to be noticed downstream. The culvert is currently half plugged and there is evidence that the stream is flowing across the ROW and eroding the concrete culvert. The stream bed immediately below the culvert is packed with some of the quarried blocks and it's starting to divert flow in our yard. We would like to see this nuisance more convincingly remediated and requirements for ongoing inspection and maintenance made as a condition in the FEIS.	3	Same as 3.	14	14C	Y	Y	5.3	Same as 3. This Commenter specifically requests "like to see this nuisance more convincingly remediated and requirements for ongoing inspection and maintenance made as a condition in the FEIS". Inspection and maintenance is required by the SPDES General Construction Permit.
5.3-4	Water Resources	Stormwater	Potential mitigation: limit the amount of land cleared at one time due to steep slope and potential for erosion and stormwater runoff during construction.	4	Limit the amount of land cleared at one time due to steep slope and potential for erosion and stormwater runoff during construction.	1	1S	Y	Y	5.3	NYSDEC SPDES General Construction Permit (GP-0-15-002) limits disturbance areas to less than 5 acres at any time unless prior approval from the MS4. The MS4 can require additional mitigation and inspections by a Qualified Professional (Part II.C.3) if the disturbance exceed 5 acres and requires additional levels of engineering review.
5.3-5	Water Resources	Stormwater	I have lived at 411 Spencer Road for 22 years, and experience a flood of water a score of years ago. My side yards, the basement, my neighbor's home looked like Buttermilk Falls. Being that Stone Quarry Road is in my backyard and the Chain Works is up and beyond, I have always wondered where the water came from.	5	No Summary.	16	16B	Y	Y	5.3	The generic SWPPP outlined in the DGEIS provides tributary mapping. See Response to Comment #5.3-3.
5.3-6	Water Resources	Stormwater	Do significant precipitation events which occur during Phase I activities such as excavation, filling, compacting, have the potential to change Site hydrology/hydrogeology?	6	No Summary.	18	18F	Y	Y	5.3	Yes. That is the rationale for the development of a Full SWPPP in accordance with the SPDES General Construction Permit (GP-0-15-002) and the NYS Stormwater Design Manual.
5.3-7	Water Resources	Stormwater	5.8.1.3 Stormwater Infrastructure Stormwater from the new development at area CW-2 is shown to run through POS E (full description in Appendix E). Given the topology of the site, the new building runoff would drain directly to the existing railroad bed, thereby bypassing POS E. The developer will need to submit a grading plan showing the method used to get runoff to POS E.	7	No Summary.	18	18AS	Y	Y	5.3	Noted. The Project Sponsor will be required to submit a detailed grading plan as part of the Site Plan Review process.

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5.3-8	Water Resources	Stormwater	The narrative calls for runoff reduction for the new impervious areas caused by new buildings, parking and drives via green roofs on the new buildings. Reducing water runoff by using green roofs is a best management practice. However, the way the DGEIS is written seems to imply that the proposed methods will reduce the water quantity coming off of a parking lot via a green roof, which is counterintuitive and inaccurate. Please clarify this. Overall, the proposed water quantity and quality methods will need further review when the full SWPPP is done for this project.	8	The way the DGEIS is written seems to imply that the proposed methods will reduce the water quantity coming off of a parking lot via a green roof, which is counterintuitive and inaccurate. Overall, the proposed water quantity and quality methods will need further review when the full SWPPP is done for this project.	18	18AT	Y	Y	5.3	Runoff Reduction techniques as outlined in Chapter 3 of the NYS Stormwater Management Design Manual examines impervious surfaces as a whole within a drainage subarea that includes both building and pavement areas. Runoff Reduction manage the impacts by using natural features and practices to slow down the runoff, promote infiltration and evapotranspiration, and consequently minimizing the need for the structural "end-of-pipe" practices. Mitigation will utilize multiple stormwater mitigation measures in accordance with NYS and City/Town regulations. Final design of the stormwater quality/quantity mitigation will be performed during the Site Plan review process to ensure mitigation of post-development impacts to the pre-development condition.
5.3-9	Water Resources	Stormwater	Finally, we recommend that the FEIS include Ongoing Project Site Maintenance of impacts originating from the CWD such as storm water impacts and trash.	9	No Summary.	14	14H	Y	Y	5.3	This is a requirement of the NYSDEC SPDES General Construction Permit (GP-0-15-002) and is a typical Site Plan Approval condition. Part VII.L of GP-0-15-002 requires the Property Owner to, at all times, "properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the owner or operator to achieve compliance with the conditions of this permit and with the requirements of the SWPPP".
5.3-10	Water Resources	Surface Water	A 50' setback is proposed from all streams. It would make more sense to base the setback requirements and treatments on the topography. Site disturbance uphill from a streambank will require a different mitigation than site disturbance downhill from a streambank.	10	No Summary.	1	1AH	Y	Y	5.3	The DGEIS takes a conservative approach by requiring a large 50' stream setbacks for the downhill and the uphill development.
5.3-11	Water Resources	Surface Water	Existing water resources should be more closely evaluated for each phase of the project. Particularly for the presence of wetlands and perched water tables.	11	No Summary.	1	1AI	Y	Y	5.3	The Project Site as a whole has been examined for wetlands with none found within the developable areas. During the individual Site Plan applications, the existing conditions within the individual Site Plan areas will be reexamined as a whole which will include or wetlands and perched water tables.
5.4-1	Vegetation and Fauna	Existing Conditions	5.4 Vegetation and Fauna - The DGEIS contains a very thorough biological study of the area's flora and fauna. Although the project includes tree removal, the DGEIS indicates preserving the most intact and valuable forested area, where the Appalachian Oak-Hickory forest is located (CW1). The DGEIS also contains a tree survey and preservation plans for CW2 (p. 5-41), the area that is currently undeveloped. Overall, the biological study appears to be complete and the proposed mitigation for areas with the most tree removal appears to be adequate.	1	Overall, the biological study appears to be complete and the proposed mitigation for areas with the most tree removal appears to be adequate.	18	18AC	N	Y	5.4	Acknowledged.
5.4-2	Vegetation and Fauna	Native Species	I've lived on that property at 333 since 1980. I've seen a lot of change in the ecology of our two and a half acres. Deer have a pretty substantial impact on it. I've had deer shot in my yard in the city limits. I've had deer hit by cars and land in the creek bed. I've had to have city police come over and shoot wounded deer in the yard. Like oh, my God, I've never been this close to a deer before, boom. So the notion that developing that south end is going to have some impact with the deer, the deer moving around. Good Lord the deer have decimated the hillside as it is, the ecology of the hillside. Anything of native species in my yard, the small things, shrubs, small plants, all gone. Deer browse them away. So I think that is an understated impact.	2	The impact to the native deer population is understated.	5	5C	Y	Y	5.4	The DGEIS Scoping does not include an analysis of impacts to the native deer population, however this comment is acknowledged since any development of a greenfield will impact and displace native species. This will be mitigated by retaining significant portions of the Site in a native state including the 23.9 acre CW1 Sub Area.
5.5-1	Public Health and Environment	Mitigation	I have attended several meeting regarding the Chain Works, and I am impressed with the knowledge and dedication of residents of South Hill, Spencer Road and especially Cynthia Brock in working through the multitude of paper and binders of information regarding Chain Works District Project. I do find it a great idea to do something with the property, but only after all safe guards are set for safe removal of all contamination, underground water tables are clean and safe. And the area not deemed a toxic waste land.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	16	16FA	Y	Y	5.5	The Property has a long industrial history that has left an environmental legacy of significant contamination at the Site. As outlined below, Emerson, the party responsible for remediating the Site, has been working with the NYSDEC since contamination was first discovered at the Site in 1987: <ul style="list-style-type: none"> • 1983 – Emerson purchases the Property • 1987 – Emerson discovers contamination in the area of the firewater reservoir and reports the contamination to the NYSDEC <ol style="list-style-type: none"> 1. Installation of a new extraction well (EW-9R-72C) to target extraction of impacted groundwater and vapor from the bedding plane at 515 ft. amsl. 2. Conversion of existing monitoring well MW-14C to an extraction well in order to target the bedding planes at 550 and 544 ft. amsl. 3. Conversion of existing monitoring well EXB-2 to an extraction well in order to target the bedding planes at 550 and 544 ft. amsl.

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5.5-1	Public Health and Environment	Existing Conditions	Thank you for the opportunity to comment on this project. Thank you for the excellent research and reporting provided in the DGEIS, and for the comment period extension. Legacy pollution problems bedevil many communities. Hidden, forgotten, and undocumented pollutants lead to degradation of our land and water resources, property value losses, and a downward spiral in community health and hope. Ithaca's South Hill drains to creeks, stormwater, water and sewer lines and groundwater that should, according to the federal Clean Water Act and other long-standing water protection laws, supply drinkable and swimmable water for Ithaca residents and to Cayuga Lake, a major recreational and drinking water resource for our region. Instead, the air and water pollution legacy of South Hill's past industrial enterprises has become a long-running nightmare for residents, property owners, businesses and public agencies. The excellent Chain Works District project proposal has become ensnared in the failure of earlier cleanup and mitigation efforts to effectively deal with and clean up this area for new uses. There is no right way to do the wrong thing. Prior to moving forward with the Chain Works District project, further investigations and effective cleanup of the site and affected areas downslope must be completed.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	20	20A	N	Y	5.5	<p>amsl.</p> <p>See Supplemental Pre-Design Investigation Fire Water Reservoir, June 30, 2011 in Appendix E1 of the FGEIS.</p> <ul style="list-style-type: none"> • 1988 – Emerson enters into a consent order with the NYSDEC to investigate and remediate the Property under the Inactive Hazardous Waste Site program • 1990 – Initial remedial investigation completed for firewater reservoir area • 1991 – A pump and treat system is installed for firewater reservoir area to extract and treat groundwater/contaminants • 1992 – Firewater reservoir is rehabilitated and put back into service • 1994 – Initial NYSDEC Record of Decision is issued • 1996 – Firewater reservoir area pump & treat system is upgraded to dual phase vacuum extraction to increase the extraction of groundwater/contaminants • 2008 – Supplemental Remedial Investigation is completed for the Property under an industrial use scenario • 2009 – Record of Decision (ROD) Amendment is issued based on 2008 Supplemental RI; includes requirement to upgrade the groundwater extraction system at the firewater reservoir • 2009 and 2015 – Enhancements are made to the extraction system • 2010 – Emerson ceases operations and vacates the premises except for security • 2017 – Emerson submits a final Phase II Supplemental RI, draft Interim Remedial Measures Work Plan, and a Petition for Boundary Reassessment for NYSDEC approval <p>Despite the enhancements and the progress made in removing volatile organic compounds from groundwater and vapor outlined above, the Site's complex geology have added to the scope and duration of remediation and mitigation efforts. Any remediation of impacts to groundwater in fractured bedrock, such as what exists at the Property, has and will require long-term management and monitoring by Emerson. According to the Project Sponsor's consultant, this is due to a process known as "back-diffusion." Contaminants in contact with the bedrock diffuse into the rock matrix over years and decades. The contaminants will slowly diffuse from the rock back into the groundwater over time. The dual phase vacuum extraction system will continue to remove contaminants from the subsurface as the contaminants diffuse out of the bedrock. In addition, the science of investigation and remediation has evolved significantly since the 1980s and, as indicated above, the remedial work at the Property has been upgraded over time to incorporate such advances to allow for more effective remediation in the future. Specifically, the remediation of the firewater reservoir area was initially conducted via a groundwater pump and treat system. Per the Project Sponsor's consultant, this type of system utilizes groundwater extraction and treatment of the water only. In 1996, the system was modified/upgraded into a Dual Phase Vacuum Extraction (DPVE) system. The Project Sponsor's consultant has explained that DPVE is a process where soil vapor and groundwater are simultaneously removed. The removal of the groundwater depresses the groundwater table and exposes impacted areas such that those areas can be susceptible to volatilization with air. Since soil vapor can be extracted at a more rapid rate, the vapor phase can remove contaminants quicker than the water phase. Thus, removal and treatment of both soil vapor and groundwater increases the overall contaminant removal. The 2009 and 2015 upgrades to the extraction system were designed based on Emerson's investigation activities completed between 2009 and 2011. The investigations focused on identifying the presence or absence of dense non-aqueous phase liquid (DNAPL) or residual source material in groundwater immediately south and east of the Firewater Reservoir. The results of the investigations showed no evidence of DNAPL or residual source material in groundwater at these locations. The highest VOC concentrations in groundwater were found to occur approximately 18 feet below the base of the reservoir within two bedding plane fractures identified at 550 and 544 feet above mean sea level (amsl). These fractures, as well as a deeper bedding plane fracture at 515 feet amsl, were noted by Emerson's consultant as the primary migration pathways for affected groundwater at the Firewater Reservoir. The objectives of the system modifications were: (1) intercept impacted groundwater within the horizontal bedding plane fractures in the C-zone between 550 feet, 544 feet, and 515 feet amsl to the south and east of the Firewater Reservoir; and (2) extract both aqueous- and vapor-phases for treatment. Specifically, the treatment system modifications included:</p> <ul style="list-style-type: none"> • Borehole geophysical surveys were completed on three (3) monitoring wells (MW-24B, MW-25B and MW-26B) in order to identify potential open fractures zones where groundwater flows. Borehole geophysics utilizes a number of different instruments in order to assess the potential for fractures that may convey water (and thus contaminants) which include: 3-arm caliper (measuring of borehole width), temperature and conductivity probes (measuring differences to identify groundwater flow), video (in order to visually assess the borehole and fractures, etc. the borehole geophysics concluded that two of the monitoring wells (MW-25B and MW-26B) indicated an upward migration of groundwater. Upward vertical flow of groundwater typically limits the ability of contaminants to migrate deeper into the saturated zone.
5.5-1	Public Health and Environment	Existing Conditions	We support the concerns of Cynthia Brock and others that the original sources of chemical contaminants have yet to be identified and located, let alone cleaned up. These tasks must be completed before new development is approved here. And those responsible must fulfill their cleanup obligations.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	20	20BA	Y	Y	5.5	<ul style="list-style-type: none"> • Soil sampling – A total of 27 surficial soil samples were collected from borings to the west of building 4. Ten of the 27 surficial soil samples identified site-related VOCs above the NYSDEC Part 375-6 Protection of Groundwater Soil Cleanup Objectives (SCOs) and 6 of these also contained concentrations above the NYSDEC Part 375-6 Restricted Residential SCOs. In addition, 34 subsurface soil samples were also collected; however, only 4 of the samples identified VOCs at concentrations above the NYSDEC Part 375-6 Protection of Groundwater SCOs.
5.5-1	Public Health and Environment	DEC Approvals Before GEIS Approval	So I would say that this has been an issue for decades and the fact that the site hasn't been properly remediated or controlled up to this point does not give me a lot of confidence that granting this sort of carte blanche at this point in time is going to result in the level of remediation I would like to see on the site.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	6	6D	Y	Y	5.5	<ul style="list-style-type: none"> • The investigation also included an assessment of bedrock aquifer characteristics. Specifically, the slug tests were completed on four wells in order to assess the hydraulic conductivity for groundwater in the area. WSP concluded that overburden groundwater (A-zone) is in communication with the uppermost bedrock groundwater (B-Zone) and that the retaining wall to the west acts as a boundary to lateral migration. Groundwater in the overburden and B-Zone discharge to a seep and groundwater sump that manage discharges behind the retaining wall. • WSP concluded that the vertical delineation of VOCs was complete.
5.5-1	Public Health and Environment	Mitigation	I only found out about this document yesterday evening and I took a really quick look essentially at some of the appendices in chapter five. One thing I would like to clarify is that class two designation is significant threat to the public health or environment action required, closed quote. So the problem with this site is that for something on the order of 30 years it's never been cleaned up. So the dual phase vapor recovery groundwater pump treatment of the fire reservoir is ineffective.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	7	7AB	Y	Y	5.5	<ul style="list-style-type: none"> • The investigation also included an assessment of bedrock aquifer characteristics. Specifically, the slug tests were completed on four wells in order to assess the hydraulic conductivity for groundwater in the area. WSP concluded that overburden groundwater (A-zone) is in communication with the uppermost bedrock groundwater (B-Zone) and that the retaining wall to the west acts as a boundary to lateral migration. Groundwater in the overburden and B-Zone discharge to a seep and groundwater sump that manage discharges behind the retaining wall. • WSP concluded that the vertical delineation of VOCs was complete.
5.5-1	Public Health and Environment	Mitigation	There's massive groundwater contamination that's never been cleaned up.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	7	7C	Y	Y	5.5	<ul style="list-style-type: none"> • WSP concluded that the vertical delineation of VOCs was complete.
5.5-1	Public Health and Environment	Mitigation	So with every investigation the areas of concern, the recognized environmental conditions just become more numerous. So before I get around to reviewing this massive document that is as Mr. DePaolo noted is 80,000 pages, I will offer written comments. But I think that the bottom line is that after so many decades of contamination associated with this site, I have no faith whatsoever that the Department of Environmental Conservation is going to require this site to be thoroughly investigated or remediated. The original record of decision was never implemented. Revised record of decision was not implemented. Basically there hasn't been any remedial efforts past the dual phase recovery groundwater treatment system adopted circa '86 or something despite more free flowing product that's not an aqueous safe liquid. There's more contamination leaking out of the site you can shake a stick at.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	7	7DA	Y	Y	5.5	<ul style="list-style-type: none"> • WSP concluded that the vertical delineation of VOCs was complete.
5.5-1	Public Health and Environment	Mitigation	And again I would reiterate this project should not receive any of the requested approvals in any way, shape or form until the site is actually remediated on a comprehensive basis in full compliance with all applicable requirements; and I'll put that in writing. Thank you.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	7	7E	Y	Y	5.5	<p>In addition to the above, WSP on behalf of Emerson has been monitoring and removing NAPL ('free oil product') from monitoring wells where it has been identified.</p> <p>While these activities by Emerson show a continued commitment to remediate the Property, the Lead Agency expects that the Project will have a significantly beneficial impact on the pace of remediation, which is already evidenced by Emerson's</p>

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5.5-1	Public Health and Environment	Mitigation	I urge all city and town officials not to approve any rezoning or any project approvals whatsoever until there is an absolutely comprehensive, viable, meaningful cleanup plan that is negotiated openly and transparently so that the public can have confidence that this incredible wide range of toxic hazards is going to be resolved once and for all.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	7	7EA	Y	Y	5.5	<p>submission to NYSDEC of a Phase II Supplemental RI Report and a draft Interim Remedial Measures Work Plan in July 2017. The remediation was initially being conducted with a goal of continued industrial use at the Property. During the first phases of investigation and interim remediation, the Property was an active industrial site with remediation goals to match the continued use (e.g., one task of the remediation in the 1990s was to get the Firewater Reservoir repaired and placed back into service). After Emerson ceased operations in 2010, the objective of the remediation changed to make the Property suitable for another industrial use. With the Project Sponsor's involvement, the Project has become a catalyst for a re-assessment of the entire Site. The Project Sponsor has informed the Lead Agency that its contractual arrangement requires Emerson to be responsible for remediation of contamination that is known or discovered before remediation is deemed complete at the Site unless such contamination is caused by a release after transfer of ownership to the Project Sponsor. The Project Sponsor shall also be responsible for any contamination that existed prior to it taking ownership of the Site but not discovered until after Emerson's remedial actions at the Site are deemed complete by NYSDEC. Therefore, the Project Sponsor is very motivated to find contamination at the Site before taking ownership.</p> <p>The Project Sponsor's motivation is demonstrated, in part, by the LaBella Phase I and Phase II ESAs performed on behalf of the Project Sponsor that identified a number of additional areas of concern ("AOC's") at the Site. Because these AOCs required further delineation of their nature and the extent of impacts before the need for and type of remediation can be determined by the NYSDEC, Emerson performed additional testing at the Site to complete the needed delineation of the various AOCs. That investigation is presented in the Phase II Supplemental RI Report found in Appendix E7 of the FGEIS.</p> <p>Emerson has also submitted a draft Interim Remedial Measures (IRM) Work Plan to NYSDEC in July 2017 to address soil and sediment contamination and sanitary sewers at specified locations on the Site. The primary goal of the IRM Work Plan is to remediate all soil and sediment within AOCs delineated in the Phase II Supplemental RI and the previously known AOC referred to as the Former Department 507 Degreaser Area or AOC-1 to meet applicable soil and sediment cleanup objectives consistent with the proposed redevelopment plans. In addition, the sanitary sewer network within the Site will be addressed through removal of residual liquids and solids from designated manholes, evaluation of pipe integrity, and investigation of soil conditions beneath certain sections of the sewer pipe. The NYSDEC will be soliciting comments from the public on the draft IRM Work Plan during a thirty day period expected to commence sometime in August 2017. A copy of the draft Interim Remedial Measures Work Plan is provided in Appendix E6 of the FGEIS and more details about the proposed IRMs are presented in PH Comment Summary Response No. 3.</p> <p>In addition, Emerson has performed a Boundary Reassessment Study (consisting of several investigations) to confirm that there are no impacts within the southern portion of the Site that require remedial action. As a result of that study, Emerson petitioned the NYSDEC in 2017 to modify the area of the Site subject to its Consent Order with NYSDEC, the ROD Amendment and the Inactive Hazardous Waste Site Registry by removing 36.76 acres of undeveloped land on the south portion of the Site from the scope of those instruments. As part of the petition, Emerson proposes an environmental easement eighty feet wide be placed over the area where existing sewer lines serving Ithaca College and the former NCR site run through that south portion of the Site. The environmental easement would address the potential for soil vapor intrusion that may exist because of contamination that migrated or may be migrating along those sewer lines from the adjoining parcels. The petition may be found in Appendix E7 of the FGEIS.</p> <p>The Lead Agency notes that the Project Sponsor is motivated to see the Site remediated in a manner that allows its reuse consistent with the Project Sponsor's plans. The Project Sponsor has informed the Lead Agency that Emerson has committed to conduct any necessary remedial actions in a timely, diligent manner. As such, while this Site has been the subject of on-going investigations and remediation for almost 30 years, the Project will facilitate more stringent remedies on a much more aggressive timeline than what has occurred historically and the Site will be appropriately remediated in conjunction with the Project.</p>
5.5-1	Public Health and Environment	Mitigation	They just continue to ignore these hazards year after year while the responsible party does everything they can to try to reduce its obligation to monitor the contamination, to deal with the contamination problems that are already known about. I think it's just not a good way to go. And again I think the key thing is everyone wants jobs. Everyone wants low income housing, a good place to live, commerce. I'm all for that generally speaking, but the bottom line is this class two site, it's polluted, massively polluted and hasn't been cleaned up. That's the first priority.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	7	7EB	Y	Y	5.5	
5.5-1	Public Health and Environment	Mitigation	I think at that time the Trexler was like 28,000. The potable standard is five parts per million. So this is just a continuing problem. And it's just I think irresponsible that it hasn't been resolved and I don't think that these concerns should be ignored any longer.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	7	7EE	Y	Y	5.5	
5.5-1	Public Health and Environment		The underlying fact is is that like others have mentioned I have not seen the DEC compel clean up of the area. And I don't have faith that even though we are given the opportunity when the record of decisions come forward to comment on that. I don't have faith that the DEC will compel remediation of the area so that we can be insured that for generations and the future of our children will be safe.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	8	8AO			5.5	
5.5-1	Public Health and Environment	Conceptual Site Layout Plan	Wow, kind of hard to go after Walter. I've been looking at this, I'm Cynthia Brock. I'm a resident of the city and I also serve on the city council. And I like many of us have been watching this project over time before Chain Works came forward and even the possibilities. And like many of us here I see this as an opportunity to try to achieve the types of clean ups that so far we have had no leverage to facilitate. So I'm excited because of that. We have a tool in our hands we didn't have before and that's a good thing. If we all want to see more housing, safe housing we want to see a vibrant community and we want to see every aspect of the city being fully utilized and contributing to the city. So I come at that from this perspective.	1	The Site has been an issue for decades and I have no confidence it will get remediated.	8	8A	N	Y	2.7	
5.5-2	Public Health and Environment	Site History	Scoping document 5.5.1 (p. 26): This section in the scoping document promises a more detailed history, but the history provided in DGEIS 5.5.1 (p. 5-43) provides no more detail than what appears in the scoping document.	2	This is a heavily contaminated Site needing remediation.	2	2C	N	N	5.5	
5.5-2	Public Health and Environment	Mitigation	By going through the documentation the areas of the incredible high level of pollution are just mind boggling. And cutting out the little fire reservoir isn't going to accomplish anything. It's regulatory exceedances for petroleum products, corrugated solvents, heavy metals. It's just absolutely mind boggling. And so this obviously poses a threat as was noted through some vapor intrusion into the possible structures that are proposed to the site.	2	This is a heavily contaminated Site needing remediation.	7	7AC	Y	Y	5.5	
5.5-2	Public Health and Environment	Mitigation	There's more contamination leaking out of the site you can shake a stick at.	2	This is a heavily contaminated Site needing remediation.	7	7DB	Y	Y	5.5	

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5.5-2	Public Health and Environment	Existing Conditions	Stormwater runoff continues to be a problem for homes downgradient of ChainWorks Property. Visual inspections of the area on October 18, 2013 with Scott Gibson shows substantial erosion of the bank of the sweeping driveway into the stream at its base resulting in water jumping the established streambed and running off in sheets downhill. Discussions with Jennifer Cleland and Robert Stundtner affirms that stormwater deposits into their property and those south of 333 Spencer Road and floods back yards and the City street. It is evident that erosion of the retaining wall is negatively impacting the movement of the water away from the streambed and into private property, and immediate remedial action must be taken. Chapter 5.5.1.7 (page 5-49) Southwestern Portion of Site - Building 30/Rice Paddy/Driveway Area. dGEIS Statement: Based on disturbances seen on historical aerials and prior testing which identified elevated concentrations of metals, polychlorinated biphenyls (PCBs) and semi-volatile organic compounds (SVOCs) in the vicinity of Building 30, LaBella advanced test borings and test pits in the area of Building 30, the 'Rice Paddy' area, and in the area of the service road that extends south to the surface water tributary to Six Mile Creek. This testing identified metals (arsenic, barium, cadmium, chromium, copper, and lead) in several samples of soil/fill materials at concentrations above the NYSDEC Part 375-6 Restricted Residential and/or Protection of Groundwater SCOs. Pesticides were detected in one sample within the Rice Paddy area at concentrations above the NYSDEC Part 375-6 Restricted Residential SCOs and the same sample also detected PCBs above the Protection of Groundwater SCO. Samples from this area analyzed for Full Toxicity Characteristic Leachate Procedure (TCLP) did not identify any concentrations above the characteristic hazardous waste criteria. TCE and perchloroethylene (PCE) were also detected in a soil sample just north of Building 30, but only the TCE concentration exceeded the Restricted Residential SCO. Figures 6B and 7B of the Phase II ESA (included in Appendix G1) illustrate the location of samples from this area and summarize the significant	2	This is a heavily contaminated Site needing remediation.	8	8J	Y	Y	5.5	The information in the DGEIS indicates that there is a significant amount of contamination at the Site as evidenced by the fact that the Property is listed as a Class 2 site on the State of New York Inactive Hazardous Waste Disposal Site Registry ("Registry"), meaning the Property is one at which contamination constitutes a significant threat to public health or the environment. However, as noted in PH Comment Summary Response No. 1 above, the Project has been a catalyst for additional remedial investigation at the Site, which has located additional impacts, and will facilitate more stringent remedies at the Site on a much more aggressive timeline than what has occurred historically.
5.5-2	Public Health and Environment	Mitigation	And I agree that this place has to be cleaned up before it can be redeveloped. I've been extremely excited about this project and reusing these buildings and opening up this part of the city and the town is full of possibilities.	2	We should not rezone Site unless/until we know what the remedial actions are; the remedial actions occur; and we can determine that they are effective to allow the proposed uses or otherwise meet the degree of remediation we desire.	9	9B	N	Y	5.5	
5.5-3	Public Health and Environment	Mitigation	Nevertheless, the DGEIS should articulate some criteria for determining when particular strategies will be used in specific places.	3	The DGEIS is not specific enough about what remedy will be used to remediate the Site.	15	15OB	Y	Y	5.5	Remedial options that may be selected for the Site are discussed in Sections 5.5.1.19 and 5.5.2 of the DGEIS. However, the exact remedies that will be used to remediate the Site will not be known until the NYSDEC approves the draft IRM Work Plan (submitted well after the DGEIS) and the NYSDEC selects specific remedies pursuant to a ROD amendment process that is currently underway. The Project Sponsor has correctly pointed out during the GEIS process that the remedy selection is subject to the exclusive jurisdiction of the NYSDEC. See <i>Town of Moreau v. N.Y. State Dep't of Env'tl. Conservation</i> , 178 Misc. 2d 56 (Sup. Ct. Albany County, 1998) ("To permit a local municipality through its municipal code to prevent this kind of NYSDEC-approved site remediation is, in the court's view, a violation of the delegation to the NYSDEC by the Legislature of the authority to oversee and control such sites and 'to contain, alleviate or end the threat to life or health or to the environment.' Such a restriction would place unreasonable restraints on the NYSDEC in its overriding obligation to preserve and protect both human health and the environment.") See also, NYSDEC Division of Environmental Remediation Proposed Part 376 Response to Comments, p. B47 (June 2006) ("The [NYSDEC] is mindful that it is the unmistakable legislative intent to preempt entirely local control over remedial programs conducted pursuant to [State Superfund]. It could not have been the legislative intent to create such a comprehensive administrative scheme to address contaminated sites and yet allow a dissenting municipality to delay or completely frustrate the execution of the scheme by withholding a permit").
5.5-3	Public Health and Environment	Mitigation	5.5.3 Mitigation Measures "Typical remedial approaches include:" The paragraphs subsequent to this preface provide a list of remediation and mitigation strategies that are commonly used in the cleanup of industrial sites. Unfortunately, they are provided for informational purposes and do not relate directly to components of the existing site or its development.	3	The DGEIS is not specific enough about what remedy will be used to remediate the Site.	15	15P	Y	Y	5.5	As stated in Sections 5.5.1.19 and 5.5.2 of the DGEIS, the remedies that the NYSDEC will choose will be based on the types of media located throughout the Site. For contaminated soils, the remedies will be based on the soil cleanup objectives set forth under 6 NYCRR § 375-6.8(b) and will depend on the anticipated uses of a particular area of the Site (i.e., residential, commercial, or industrial). For those areas where residential uses are proposed, the Restricted Residential soil cleanup objective will be used as the basis for selecting the appropriate remedial action by the NYSDEC. For areas of commercial use and industrial use, the Commercial and Industrial soil cleanup objectives will be considered by the NYSDEC, respectively. Different soil cleanup objectives between different areas of the Site may be used so long as such areas are defined and described in the environmental easement to be applied to the Site. All necessary institutional and engineering controls will be implemented, maintained, monitored, and enforced through a site management plan ("SMP"). See 6 NYCRR § 375-2.8(c)(3). The SMP will also set forth regular reporting requirements to the NYSDEC following remediation of the Site.

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5.5-3	Public Health and Environment	Mitigation	I will admit I read about 20 pages and I came away with one overarching observation and concern which is that the proposed, the proposed remediation and mitigation is so, there's a laundry list of items that are typically applied in situations where sites are extensively contaminated, but there are virtually no specifics related to this site. And the entire, the future is sort of being weighted out as one that is going to be addressed on a site specific basis as issues come up.	3	The DGEIS is not specific enough about what remedy will be used to remediate the Site.	6	6B	Y	Y	5.5	<p>Remedies to protect and control groundwater will also be dictated by the amended ROD. The Lead Agency understands that generally, such measures will involve: (1) removal or control of any areas deemed sources of groundwater contamination, e.g., excavation or in situ remediation of soils with contamination above protection of groundwater standards (see PH Comment Summary Response No. 5 for more details); (2) to the extent feasible, restore groundwater to groundwater quality standards; and (3) to the extent feasible prevent further migration of any groundwater plumes off-Site. These requirements are set forth in 6 NYCRR §§ 375-1.8(d). The Project Sponsor has informed the Lead Agency that based upon the results of the environmental investigations to date, Emerson, the party responsible for implementing remedial measures at the Site, is considering the following groundwater remediation technologies and expects to further analyze the usefulness and feasibility of these technologies in an upcoming remedial feasibility study for the NYSDEC:</p> <p>(1) groundwater extraction and ion exchange treatment to possibly address barium; (2) expanding the number of extraction wells tied to the existing groundwater treatment system associated with the firewater reservoir to address CVOCs at Site locations; (3) in-situ treatment, such as chemical oxidation, to treat CVOCs; (4) in-situ chemical oxidation to address cyanide in groundwater; (5) in-situ treatment to address petroleum/NAPL; and (6) monitoring.</p> <p>Other technologies may also be considered by Emerson in the feasibility study and presented to the NYSDEC. Soil vapor intrusion will be addressed through management of the contamination to prevent exposure, e.g., implementation of soil vapor intrusion systems. More details on the methods most likely to be used at the Site are set forth in PH Comment Summary Response No. 18. Impacted sediments in on site creeks or ditches will be addressed in a manner similar to soils, most likely excavation. Additionally, institutional and engineering controls will be implemented through an environmental easement, regardless of what specific remedies are selected by the NYSDEC.</p> <p>As first discussed in PH Comment Summary Response No. 1, Emerson submitted a draft IRM Work Plan to NYSDEC in July 2017 to address soil and sediment contamination and sanitary sewers at specified locations on the Site. The IRM Work Plan will be released for a 30 day public comment period starting sometime in September 2017. From the Lead Agencies review of the draft IRM Work Plan, it understands that a primary goal of the IRM Work Plan is to remediate all soil and sediment within 10 AOCs delineated at the Site to the soil cleanup objective applicable to the anticipated future use of that area of the Site or, in some cases where the AOC is deemed to be a source of contamination in groundwater, the protection of groundwater soil cleanup objective. Below is a table reproduced from the IRM Work Plan that summarizes the AOCs proposed for an IRM and the applicable soil cleanup objective.</p> <p>The proposed remedial action for all of the above AOCs but AOC-1 and AOC-29 entails excavation and off-site disposal of soils or sediments above their applicable cleanup objective followed by installing a demarcation layer and backfilling with clean material. In the case of impacted sediments removed from portions of drainage ditches found within AOC-32, AOC-35K and AOC-35L, restoring the remedial area within the ditches will entail backfilling with clean soil, placing a geotextile lining and installing riprap along the ditch bottom and banks. The proposed remedial action for AOC-1 is excavation and off-site disposal of impacted soils to a depth of approximately 3 feet, installation of an engineered low permeability cap to minimize infiltration and migration of the remaining contamination, and backfilling with clean material. The presence of utilities in and around AOC 1 prevent excavation of all impacted soils as a remedy. Surface soils across the footprint of AOC-29 exceed the commercial use soil cleanup objective for certain contaminants. AOC 29 will be regraded and entirely covered with one foot of clean soil to eliminate the direct exposure pathway which is the relevant risk for this area. A demarcation layer will be installed before placement of the clean soil to notify future workers in that area of the presence of the impacted soils.</p> <p>The Project Sponsor has informed the Lead Agency that remedial technologies for the other AOCs with impacted soils or sediments as well as groundwater impacts will be considered by Emerson in the feasibility study presented to NYSDEC.</p>

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											It should be noted that although the Lead Agency and Project Sponsor cannot identify what specific remedies will be used at the Site until the NYSDEC approves the draft IRM Work Plan and amends the ROD, the purpose of a GEIS is to assess a wide variety of impacts at a more conceptual level on a larger geographic area such as the Site. GEISs that are prepared for larger developments at an early stage in the planning process give agencies an opportunity to plan future courses of action to avoid or mitigate such impacts. A GEIS may include site-specific analysis for components of a project that are well defined and establish thresholds for impacts from project elements that are more conceptual or not yet fully developed at the time of assessment. The Lead Agency is evaluating a number of mitigation measures to ensure impacts from environmental contamination are avoided and/or mitigated to the maximum extent practicable. <i>The Lead Agency will be proposing the inclusion of thresholds and/or mitigation measures to ensure that the Site: (1) is remediated to restricted residential, commercial and/or industrial remedial objectives, as appropriate based on the proposed uses at the Site; (2) will remediate groundwater contamination to the extent required by applicable law; (3) will be subject to appropriate use restrictions consistent with the proposed uses at the Site; (4) will be subject to appropriate prohibitions on the use of groundwater at the Site without approval from the NYSDEC; (5) will be subject to development and implementation of an appropriate SMP; and (6) will be subject to on-going monitoring that institutional and/or engineering controls are being properly implemented and/or maintained. Therefore, the Lead Agency believes that the discussions of remedial alternatives in the GEIS are sufficient to meet the requirements under SEQRA to allow the various agencies to make appropriate approval decisions within their jurisdictions.</i>
5.5-4	Public Health and Environment	Record of Decision	What are the decision points for DEC regarding the ROD Amendment and how do they relate to the DGEIS?	4	What is the ROD Amendment process and how does it relate to the DGEIS and conceptual Site plan?	1	1AN	Y	Y	5.5	Allowing the Site to be used for residential and commercial purposes is a fundamental change to the existing ROD. The Lead Agency understands that this requires the NYSDEC to follow the same process in amending the ROD as what was needed to develop the original remedy, including citizen participation, documentation, and approvals. See , DER-2/Making Changes to Selected Remedies (last revised April 1, 2008), p. 4. The existing data, including data generated through the Phase II Supplemental RI, which has now been submitted by Emerson to the NYSDEC for review and approval, identify the nature and extent of contamination at the Site and will be used to identify potential remedial alternatives consistent with the proposed commercial and residential uses at the Site. The alternatives will be presented to the NYSDEC and analyzed in a Supplemental Feasibility Study.
5.5-4	Public Health and Environment	Record of Decision	Is there a public process in the ROD Amendment?	4	What is the ROD Amendment process and how does it relate to the DGEIS and conceptual Site plan?	1	1AO	Y	Y	5.5	Once the Phase II Supplemental RI Report has been approved as final and the Feasibility Study completed, the NYSDEC will select a remedy and issue a proposed amended ROD for public review. The NYSDEC's regulations require the following process for public review of the ROD amendment: •The NYSDEC mails a notice and brief analysis of the proposed amended ROD to those on the Site contact list, which includes sufficient information to provide a reasonable explanation of the proposed amended remedy, including but not limited to, a summary of the NYSDEC's reasons for preferring it over other remedial alternatives considered and the construction and site management requirements of the proposed remedy. 6 NYCRR 375-2.10(c)(1). •The NYSDEC provides the public thirty (30) days to comment on the development and implementation of the ROD amendment, including an opportunity to submit comments at a public meeting. 6 NYCRR 375-2.10(c)(2).
5.5-4	Public Health and Environment	Record of Decision	We need to see a whole sequence of approvals that include actions related to the ROD Amendment	4	What is the ROD Amendment process and how does it relate to the DGEIS and conceptual Site plan?	1	1AP	Y	Y	5.5	•Written and oral comments received during the comment period are summarized and made available to the public upon issuance of the amended ROD. 6 NYCRR 375-2.10(c)(3). After the citizen participation is closed, the NYSDEC will finalize the amended ROD, documenting: • Location and description of the Site. • A history of the operation of the Site. • The current environmental and public health status of the Site. • An enforcement history and current status of the Site. • The specific goals and objectives of the remedy selected for the Site. • A description and evaluation of the remedial alternatives considered. • A summary of the basis for the NYSDEC's decision. • A list of the documents the NYSDEC used in its decision-making. • A responsiveness summary. 6 NYCRR 375-2.8(e). The final documents, notices, and fact sheets will then be made available in the document repository. 6 NYCRR 375-2.10(e).
5.5-4	Public Health and Environment	Record of Decision	How might the ROD Amendment – if approved – affect the conceptual site plan?	4	What is the ROD Amendment process and how does it relate to the DGEIS and conceptual Site plan?	1	1AQ	Y	Y	5.5	

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											<p>The Project Sponsor has informed the Lead Agency that Emerson has decided to proceed with some remedial actions as interim remedial measures or IRMs. Emerson has submitted to NYSDEC an IRM Work Plan to remediate specific areas of concern identified at the Site. The areas of concern to be addressed with the IRM Work Plan and the proposed remedial measures to be employed are discussed in PH Comment Summary Response No. 3 and a copy of the IRM Work Plan provided in Appendix E6 of the FGEIS. The Lead Agency understands an IRM to mean an activity to address both emergency and non emergency site conditions, which can be undertaken without extensive investigation and evaluation, to prevent, mitigate or remedy environmental damage or the consequences of environmental damage attributable to a property. 6 NYCRR 375-1.2(a)(b). When an IRM is likely to represent the remedy or a significant portion of the remedy for a site, the NYSDEC will require a 30 day comment period. 6 NYCRR 375-1.10(h). The Project Sponsor has informed the Lead Agency that NYSDEC will commence a 30 day comment period to obtain comments on the IRM Work Plan proposed by Emerson. The Lead Agency also understands that when an IRM has been implemented, the NYSDEC may determine, based on site-specific circumstances including post-implementation investigation and/or monitoring, that the IRM satisfies the goal of the remedial program for the property, where only continued implementation of a site management plan associated with the IRM or other engineering or institutional controls are required. In such a case, the NYSDEC will propose no further action as the alternative for that particular area of concern. 6 NYCRR 375-2.8(d). Thus, the IRM may become part of the final remedy. Because of the IRMs proposed for the specific AOCs at this Site, the Project Sponsor anticipates that the IRMs employed will be a part of the final remedy for this Site. Such a determination will be finalized in the ROD amendment.</p> <p>The Lead Agency also understands that Emerson has petitioned the NYSDEC in 2017 to modify the area of the Site subject to its Consent Order, the ROD Amendment and the Inactive Hazardous Waste Site Registry by removing the undeveloped land on the southern portion of the property, approximately 36.8 acres, from the scope of those instruments and any remedial obligations thereunder. Additional details about that petition are set forth under PH Comment Summary Response Nos. 20 and 21. A copy of the petition may be found in Appendix E2 of the FGEIS. The Lead Agency's review of the petition indicates that the basis for this revision to what constitutes the Site for remedial purposes is the fact that additional investigation in the southern portion of the Site has not revealed impacts requiring remedial action. As a part of Emerson's proposal, an environmental easement eighty feet wide would be placed over the sewer lines coming from the former NCR property and Ithaca College to prevent soil vapor intrusion into habitable buildings that has the potential to occur from those sewer systems. The Project Sponsor has informed the Lead Agency that another alternative that NYSDEC is considering is to leave these eighty feet wide sections following the NCR and Ithaca College sewer lines through the south end of the property as part of the Site while releasing the remainder of the south end of the property from remedial obligations.</p> <p>The Project Sponsor has informed the Lead Agency that the NYSDEC may grant the petition through the process of issuing an Explanation of Significant Differences document. NYSDEC's program policy, DER-2 (last revised April 1, 2008), sets forth the process by which it makes changes to selected remedies. NYSDEC considers redefining the boundaries of what constitutes the site for purposes of remediation as a change in the selected remedy. The policy divides such changes into three categories, minor, significant and fundamental. The degree of change dictates the procedure used to make the change. A "significant" change, which the Project Sponsor understands to be the category NYSDEC has placed the petition for site boundary modification, is defined as one that impacts an essential part of the remedy. A "fundamental" change involves a new approach to the remedy or may add/subtract significant components of the remedy. A "minor" change is one with little to no impact. For significant changes, NYSDEC issues an Explanation of Significant Difference which serves as notice that a change to a remedy has been made. Formal amendment to the ROD is not deemed necessary because NYSDEC is not reconsidering the overall remedy. While a formal comment period or public meeting is not required, if there is significant public interest, a public meeting and comment period may be conducted. Concurrence from NYSDOH is required before final approval. It is unknown at this time whether the NYSDEC will require a public comment period or hold a public meeting before making a decision on the requested change to what constitutes the Site subject to remedial obligations.</p> <p>In terms of how the ROD relates to the GEIS and the conceptual site layout plan, the GEIS process considers, but cannot control, the ROD amendment. Instead, the GEIS is a "hard look" for any adverse impacts the proposed PUD/PDZ codes, Design Standards, and the conceptual site layout plan may have under SEQRA. Although this review must necessarily include an analysis of any public health and environmental impact the potential remedies may have and how those remedies may affect Site redevelopment and/or mitigate impacts therefrom, the GEIS is not a review of any specific ROD amendment nor what remedies will be selected by the NYSDEC. As noted above, the public will have a separate opportunity to comment on the ROD amendment specifically.</p>

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											<p>As discussed in Chapters 5 and 10 of the DGEIS, the way that the GEIS is analyzing potential impacts of the types of remedies the NYSDEC may chose is reviewing typical remediation methods, engineering controls, and institutional controls used at sites with similar contamination and site uses. If the remedy the NYSDEC selects is one of the potential remedies analyzed in the GEIS, the ROD amendment will have no effect on the PUD/PDZ, conceptual plan, or SEQRA review because the remedy will be within the thresholds already analyzed in the GEIS. If the NYSDEC selects a remedy or remedies that is not one of the potential remedies analyzed in the GEIS, the Lead Agency will determine whether a Supplemental EIS is needed to analyze any public health and environmental impact the selected remedy may have and how those remedies may affect Site redevelopment and/or mitigate impacts therefrom. As noted above in PH Comment Summary Response No. 3, at this point, the Lead Agency is evaluating a number of mitigation measures to ensure impacts from environmental contamination are avoided and/or mitigated to the maximum extent practicable. <i>The Lead Agency will be proposing thresholds and/or mitigation measures to ensure that the Site: (1) is remediated to restricted residential, commercial and/or industrial remedial objectives, as appropriate based on the proposed uses at the Site; (2) will be subject to appropriate use restrictions consistent with the proposed uses at the Site; (3) will be subject to appropriate prohibitions on the use of groundwater at the Site without approval from the NYSDEC; (4) will be subject to development and implementation of an appropriate SMP; and (5) will be subject to on-going monitoring that institutional and/or engineering controls are being properly implemented and/or maintained.</i></p> <p>In regards to the timing between the ROD amendment, GEIS, and the conceptual site layout plan, the Project Sponsor has informed the Lead Agency that Emerson has committed to remediating the Site in a manner consistent with the Project Sponsor's conceptual site layout plan as it exists at the time of the transfer of the Site to Project Sponsor. Because the use of the Site as described in the conceptual site layout plan informs the remedial goals to be achieved and remedial methods to be used, conclusion of the EIS process and approval of the conceptual site layout plan need to occur prior to or at the same time as any ROD amendment.</p>
5.5-5	Public Health and Environment	Mitigation	5.5.3 Mitigation Measures "Areas of impacted concrete (Buildings 4, 8, 13A, 14 and 34) will require remediation which will most likely take the form of removal or capping." -Removal and capping are significantly different approaches with considerable implications for pollution migration and impacts on adjacent areas. Source removal is preferable, where practicable.	5	Sources of contamination must be dug out and removed from the Site.	15	15OA	Y	Y	5.5	<p>The Lead Agency understands that the NYSDEC may require Emerson to dig out sources of contamination and remove them from the Site. A "source area" or "source" of contamination is defined by the NYSDEC regulations as:</p> <p>Source area or source means a portion of a site or area of concern at a site where the investigation has identified a discrete area of soil, sediment, surface water or groundwater containing contaminants in sufficient concentrations to migrate in that medium, or to release significant levels of contaminants to another environmental medium, which could result in a threat to public health or the environment. A source area typically includes, but is not limited to, a portion of a site where a substantial quantity of any of the following are present:</p> <p>(1) concentrated solid or semi-solid hazardous substances; (2) non-aqueous phase liquids; or (3) grossly contaminated media.</p> <p>6 NYCRR § 375-1.4 (au).</p>
5.5-5	Public Health and Environment	Mitigation	Before this project starts is our only chance to clean up the site. It needs to be completely cleaned up before construction, or the the construction work will without any doubt release more underground contaminants to the entire neighborhood.	5	Sources of contamination must be dug out and removed from the Site.	19	19AA	Y	Y	5.5	<p>In addition, the Lead Agency understands that the NYSDEC established soil cleanup objectives include standards for protection of groundwater at 6 NYCRR § 375-6.8(b). If soil in an area of groundwater contamination has the same contaminant above the protection of groundwater standard as is also found in the groundwater, the NYSDEC will typically treat that area as a source of contamination and select a remedy to best address that source. In some instances, that may be excavation but it does not necessarily have to be. For VOCs in soil, it may also be a technology that removes the contamination from the soil in situ such as soil vapor extraction.</p>
5.5-5	Public Health and Environment	Mitigation	Given the horizontal and vertical faults in our shale, there is no realistic way to cap the contamination.	5	Sources of contamination must be dug out and removed from the Site.	19	19AB	Y	Y	5.5	<p>The Lead Agency understands that the Phase II Supplemental RI did not identify any grossly contaminated soils but the following areas of soil impacts were identified to be above the protection of groundwater standards and thus may be addressed by excavation or some other method to remove the "source."</p>
5.5-5	Public Health and Environment	Mitigation	And I don't think that engineering, institutional controls, caps and all that leaving the contamination in place is acceptable. I think the bottom line is, and I've advocated this from the very beginning, the high level sources of contaminate has to get dug out. It's source removal and got to go and then ultimately I think this site perhaps could be remediated to the point where it doesn't pose a threat to the people living around it.	5	Sources of contamination must be dug out and removed from the Site.	7	7EC	Y	Y	5.5	<ul style="list-style-type: none"> · AOC 1 - Former Department 507 Degreaser (exterior) · AOC 26 - Building 24 Interior (second floor) and Building 24 Exterior (parking lot) · AOC 27 - Former Salt Baths · AOC 28 - Oil Shed Area · AOC 29 - Former Propane Storage Area · AOC 30 - Rice Paddy Area · AOC 31 - Upper Parking Lot 6 · AOC 32 - Former Spray Pond Area · AOC 34 - Area East of Buildings 13A and 14 · AOC 35A - East of Building 24 · AOC 35C - Building 11A (LBA-SB-250) · AOC 35D - Near Parking Lot 4 · AOC 35G - South of Parking Lot 3 · AOC 35H - Parking Lot 3 · AOC 35K - Former Railroad Right of Way (DS-1) · AOC 35L - Former Railroad Right of Way (SB-240)

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											<p>In fact, Emerson proposes in its IRM Work Plan excavation and off-site disposal of soils impacted above the relevant soil cleanup objectives for all the above AOCs, except AOC-1 and AOC-29. For AOC-1, Emerson proposes a combination of excavation and an engineered low permeability cap because utilities in the area prevent excavation only. For AOC-29, Emerson proposes to regrade and add one foot of clean soil to create a cap that eliminates the direct contact exposure pathway that is the concern in that area. See Appendix E6 of the FGEIS.</p> <p><i>Based upon the above, the Lead Agency will establish as a threshold that the NYSDEC require either excavation or some in-situ remedial technology that treats the contaminants from soils in the above referenced areas to be protective of public health and environment. For AOC-1, the Lead Agency will establish as a threshold a combination of excavation and capping of impacted soils left behind because of utilities. However, it should be understood that the NYSDEC will make the final decision about what remedies will be implemented at the Site.</i> As noted in PH Comment Summary Response No. 3 above, the Project Sponsor has correctly pointed out that municipalities may not require a different or more stringent remediation plan than what is selected by the NYSDEC.</p> <p>Public comments about what remedy should be undertaken at the Site should be directed to the NYSDEC during the public participation process of the IRM Work Plan approval and ROD amendment, as noted in PH Comment Summary Response No. 4, above.</p>
5.5-6	Public Health and Environment	Mitigation	I did fill out a card. My name is Ken Deschere. I lived in one of the houses that were shown on your map in South Hill Terrace for the last 35 years. Raised a family there. I worked in the late '70s in the Morse Chain building 21. I'm familiar with the area and some of the problems that are faced by anyone trying to clean up effectively the remediation. And I just want, my biggest thing to say is thank you to Mr. Lubin and his staff and the people he is willing to spend money on to develop the project. I worked with environmental investigations and developed the website looking at all the pollution and took courses at Cornell and answered all kinds of questions trying to better understand all the pollution and the things left behind by a century of industrial operations. And the more we looked, the more we found, the uglier it was and also the clearer it was that the DEC and Department of Health don't have the time, resources and even inclination to try to really work on solving these problems. What it takes is an investment in time and effort and expertise to try to bring some meaningful project that hopefully will pay good economic rewards to all of us to bring that to fruition. Just looking at the 80,000 documents and the list of acronyms that extends for six pages, it's pretty easy to see this is complicating material and a lot of details and a lot of bases that have to be touched and I'm very grateful that someone, an organization is willing to do that to try to improve what's a very big part of the city and has been for a very long time.	6	The proposed development will spur needed remediation.	10	10A	N	Y	5.5	The Lead Agency agrees with this comment. If the Project does not go forward, the Property will continue to be remediated to an industrial use standard, and the Lead Agency has no indication that a more aggressive remediation schedule spurred on by a motivated buyer and seller would occur. See also PH Comment Summary Response No. 1 above.
5.5-7	Public Health and Environment	Mitigation	What is the sequence and timing of the remedial work in the CW 3? Will all remediation in that area be complete before Phase 1 begins? Building 24 is part of the proposed Phase 1 of the project - and it includes residential development.	7	What is the timing of remediation in relation to Site development?	1	1AL	Y	Y	5.5	The Project Sponsor has informed the Lead Agency that, based upon the results of the Phase II Supplemental RI, Emerson has developed and submitted to NYSDEC for approval an IRM Work Plan for remediation of impacted soils that exceed the protection of groundwater standards and the applicable soil cleanup objectives based upon the proposed use of the relevant areas of concern as depicted on the conceptual site layout plan. Those areas of the Site proposed to be addressed by an IRM are shown on Figures 3-1 through 3-7 of the IRM Work Plan found under Appendix E6 of the FGEIS. The remedial action selected for all of these areas of concern except for AOC-1 and AOC-29 are excavation and off-site disposal of soils impacted above the relevant soil cleanup objective. The remedial action proposed for AOC-29 which involves only impacted surface soils entails adding a one foot cap of clean soil to that area to prevent contact with the impacted soil. The proposed remedy for AOC 1 includes excavation down to 3 feet below the surface followed by installation of a low permeability cap. Complete excavation of impacted material is not possible in this area because of the proliferation of utilities. The Lead Agency understands that this work is intended to be completed prior to the future amendment of the Amended ROD.

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5.5-7	Public Health and Environment	Record of Decision	How will the ROD Amendment DGEIS and PUD timing be coordinated?	7	What is the timing of remediation in relation to Site development?	1	1AM	Y	Y	5.5	<p>As discussed under PH Comment Summary Response No. 4, except for IRMs, neither remediation nor the Site development can start until the ROD is amended by the NYSDEC to establish what remedial activities will be implemented at the Site and allow its redevelopment consistent with the conceptual site layout plan. The Project Sponsor has informed the Lead Agency that at this time Emerson plans to only use the IRM process for those AOCs set forth in the IRM Work Plan.</p> <p>The Lead Agency understands that once the ROD is amended, a SMP will be developed and submitted at the same time as the work plans for impacted soil and groundwater in the areas of the Phase I redevelopment (or shortly after work plan approvals). The SMP will cover the entire Site but may be revised as specific remedial actions at other areas of the Site are conducted. The SMP will include a soil excavation/management plan; a groundwater management plan; community air monitoring plan; and health and safety plan, all of which will be implemented during remedial and/or construction activities. The SMP will also contain operation and maintenance plans for any remedial systems in operation at the Site; and a monitoring and reporting plan. Should capping or in situ stabilization, as opposed to excavation, be selected by the NYSDEC as a remedy for contaminated soils anywhere on the Site, the SMP will dictate that the capped or stabilized areas must be inspected by a professional engineer on a regular basis and the professional engineer and site owner will need to certify to the NYSDEC that the capped/stabilized area remains in place. The certifications are typically provided annually. Groundwater monitoring will be required at the Site either as part of any active remedial system or as the selected remedy. The SMP will require that all groundwater monitoring be reported on a regular basis to the NYSDEC. Operation and maintenance plans for all remedial systems implemented at the Site including groundwater as well as vapor intrusion systems, will also be part of the SMP. The SMP will also protect any occupied portions of the Site (e.g., Phase I) during subsequent remediation and construction. For example, as described in PH Comment Summary Response No. 34, the Community Air Monitoring Plan will require the Project Sponsor to monitor the air within and at the boundaries of any construction area or area where a remedial system is being installed for VOCs and fugitive dust so that if any VOCs or fugitive dust within or at the edges of the remediation/construction area exceed acceptable standards, all work will stop until the issue is remedied.</p>
											<p>After the SMP is developed and land use approvals for Phase I of the redevelopment are obtained, Emerson will begin remediating those portions of the Site not already addressed by the IRMs as soon as practicable to allow for its reuse consistent with the conceptual site layout plan, the Order on Consent with the NYSDEC, and its agreement with the Project Sponsor. Because the Site will be developed in phases to allow for timely remediation and redevelopment of the Site, the schedule of the actual remediation work and Site development will be intertwined. First, remediation will be implemented in those areas not already addressed by the IRMs that are part of the Phase I redevelopment (i.e., Buildings 21, 24, 33 and 34, and land surrounding those buildings as designated in the Phase I site plan submission) to protect public health and protect and/or treat groundwater. At this time, the Project Sponsor anticipates that the only areas within the Phase I redevelopment that might require further remedial action of the soils following the IRMs would be those areas where demolition of a structure to allow for the proposed redevelopment exposes impacted soils above the applicable soil cleanup objective that would not be capped by asphalt for parking or concrete for building pads such as the oil shed south of Building 34.</p>
											<p>The Project Sponsor informed the Lead Agency that remediation of groundwater, other than by excavation of the soils with impacts above protection of groundwater standards, will be addressed as part of the amendment to the Amended ROD. The remedial action selected through the ROD process for groundwater impacts in the vicinity of Building 24, including the "seep" that discharges from a pipe running under Building 24, will be designed prior to any construction activity and implemented either prior to or during construction. See Figure 4-1 of the Phase II Supplemental RI. Groundwater remediation selected for the area to the south of Building 34 will also be designed prior to construction and implemented either prior to construction or during the course of construction activity in that area. See Figure 4-3 of the Phase II Supplemental RI. Remedial actions to prevent soil vapor intrusion within Buildings 21, 24, 33 and 34 will be designed and implemented prior to occupancy of those buildings.</p>
											<p>Remediation and redevelopment of the remainder of the Site will follow a similar pattern, except that Emerson will likely proceed with required remedial actions at other areas of the Site in advance of redevelopment should the Project Sponsor not yet be ready for its next phase of the Project because Emerson is contractually committed to the Project Sponsor to proceed with remedial efforts in a diligent and timely manner. Any remediation of soils involving excavation that may be required will be performed prior to construction activity commencing in that area. Because parking areas and building foundations often serve as appropriate caps for impacted soils, the NYSDEC will review and approve the relevant construction plans before construction begins when a cap is the selected remedy. If construction in an area to be capped will not be proceeding for some time, the NYSDEC will likely require a "temporary" cap be placed over the area for the interim. Any required active treatment or monitoring of groundwater not already being conducted in a particular area shall commence prior to or during construction in that area depending on whether Project Sponsor is in a position to commence the planned construction activity. Any vapor intrusion systems will be designed, approved by the NYSDEC and NYSDOH, installed and tested prior to occupancy of any structure that may require such a system.</p>
5.5-8	Public Health and Environment	Mitigation	Who is responsible for site cleanup after property ownership is transferred?	8	Who is responsible for Site cleanup after the Site ownership is transferred?	1	1AT	Y	Y	5.5	<p>As noted in PH Comment Summary Response No. 1, Emerson remains responsible under the Consent Order with NYSDEC and the contract with Project Sponsor for remediation of the Site after transfer of the Site to the Project Sponsor for any contamination discovered on the Site prior to remedial actions being completed. However, if contamination comes to exist on the Site after transfer of the Site to the Project Sponsor because of a spill or release after closing or contamination that existed prior to transfer of the Site is discovered after Emerson's remedial actions are deemed complete at the Site by NYSDEC, the Project Sponsor will be responsible for its remediation.</p>

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5.5-9	Public Health and Environment	Mitigation	Who is responsible for off-site contamination/remediate (e.g. soil vapor venting systems in private homes) after property ownership is transferred?	9	Who is responsible for off-site remediation after property ownership is transferred?	1	1AS	Y	Y	5.5	Emerson remains responsible under the Consent Order with NYSDEC for off-site remediation (OU-3) and the firewater reservoir area (OU-1) after ownership of the Site is transferred to the Project Sponsor.
5.5-10	Public Health and Environment	Off-Site Investigation	5.5.1.19 Additional Investigation / Remediation "The applicable NYSDEC criteria and thus extent of remediation is dependent on the use of the Site with industrial uses requiring the least stringent remedial work for soil and residential uses requiring the most stringent remedial work for soil." Requiring cleanup to use-specific standards within the site does not address the issue of the ongoing migration of pollution from the site to surrounding (predominantly down gradient) areas.	10	Requiring cleanup to use-specific standards within the Site will not address on-going off-site migration of pollutants.	15	15JA	Y	Y	5.5	Emerson will remain liable for off-site contamination through groundwater and will remedy any migration pursuant to the remedy selected by the NYSDEC. The method Emerson will use in addressing groundwater migration, though, is the same regardless of whether use-specific standards are used at the Site. Use specific standards are limited to soil and range in stringency based on the use of the site. Groundwater, on the other hand, is compared to the NYSDEC Part 703 Groundwater Quality Standards, which are the same regardless of use. If a contaminant found in groundwater is also found in soils above the NYSDEC's protection of groundwater standard, the NYSDEC will consider that soil to be a source area. The NYSDEC would then require Emerson to properly remediate and eliminate any such source, regardless of the use-specific standard otherwise relevant to the contaminated soil.
5.5-10	Public Health and Environment	Existing Conditions	I am writing to you regarding my concerns about the Chain Works District Project. I am worried about the toxic waste that has been buried on the hill for years and the effects it has on the ground water, vegetation and fauna on South Hill and what has seeped downhill to the Spencer Road area and beyond.	10	Concerned about off-site impacts from the migration of Site contaminants through groundwater.	16	16A	Y	Y	5.5	
5.5-10	Public Health and Environment	Existing Conditions	Another concern I have is that my home is built into the hillside as well as 413 Spencer Road (both homes were built 1920's, by the same builder) and the basements have shale and rock walls. Water does move through the back stone walls which are controlled by ditches and drains. The water runs off to the under ground systems to travel where ever it goes. On an rare events water will rush through the shale, the basement and disappear into the ground. My concern is water makes it's own way through rock and since Chain Works is at the top of the hill and I'm at the bottom, is toxic stuff coming through my home via the water table? And the neighbors?	10	Concerned about off-site impacts from the migration of Site contaminants through groundwater.	16	16C	Y	Y	5.5	
5.5-10	Public Health and Environment	Existing Conditions	Several seasons ago, by the round about at Spencer Street, Albany Street and where Spencer Road meets, the ice frozen on the shale wall there had colorful colors due to testing of the runoff from Chain Works, that too has me wondering about the pollution from the sites and where does it all go to when it is in the underground water table?	10	Concerned about off-site impacts from the migration of Site contaminants through groundwater.	16	16D	Y	Y	5.5	
5.5-10	Public Health and Environment	Existing Conditions	Has the applicant/DGEIS considered the benefit of additional, voluntary groundwater sampling at all downgradient monitoring wells: During Phase I excavation, filling, and compacting activities? During heavy rainfall events? After heavy rainfall events? During spring thaw? i.e. during a time when potential effects of frost wedging on bedrock fractures which control vertical and horizontal movement of groundwater would become apparent?	10	Concerned about off-site impacts from the migration of Site contaminants through groundwater.	18	18AF	Y	Y	5.5	
5.5-10	Public Health and Environment	Mitigation	(cont'd) and (c) impact of the plumes on downgradient properties.	10	Concerned about off-site impacts from the migration of Site contaminants through groundwater.	8	8AJ			5.5	
5.5-10	Public Health and Environment	Mitigation	Finally, upon remediation of the spills, the property owner is responsible for replacing downgradient water and sewer systems and trenches and implementing containment strategies to ensure that contaminated soil and groundwater will not continue to migrate off-site or into municipal storm water systems.	10	Concerned about off-site impacts from the migration of Site contaminants through groundwater.	8	8AK	Y	N	5.5	
5.5-10	Public Health and Environment		So once you get away from the sort of nitty gritty, fun things we like to think about when we envision the future and as I started delving into what some people have said not only 80,000, over a 100,000 pages of this document I am reminded that first and foremost, even though we like to look at the pictures and envision all of this, first and foremost we are dealing with a class two superfund hazardous waste setting. And that in and of itself makes me think, when I'm thinking about traffic and playground feels like I'm putting the cart before the horse because in my understanding the sources of the contamination that they are drawing out of the fire water reservoir has never clearly been identified. They don't know where that source is coming from. They do know that when they go through that pump and treat system year after year after year after year, the level of contamination that they are pulling out is not going down. It's staying pretty much the same. So there is a tremendous source of contamination likely under those buildings that will continue to be a concern.	10	Concerned about off-site impacts from the migration of Site contaminants through groundwater.	8	8AL			5.5	

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5.5-11	Public Health and Environment	Mitigation	Many homes have had sub pressurization systems installed, but it's not all clear that they are actually that effective because of the reason that the aerated zone to allow vaporization with the depressurization system since many of the homes are built on bedrock. So I think that this has not been a good situation since I identified the problems at the site maybe 12 years ago when your risk rider said there was no clear declining trend in the groundwater contamination.	11	Depressurization systems in off-site homes may not be effective.	7	7ED	Y	Y	5.5	Existing off-site contamination and related remedial actions are outside the scope of the Project and therefore the GEIS. Emerson will be maintain responsibility for offsite contamination under its existing consent order with the NYSDEC and the NYSDEC therefore maintains oversight over all off-site remedial activities.
5.5-12	Public Health and Environment	Mitigation	We are very supportive of the adaptive reuse of the former Morse Chain/Emerson industrial property. We recommend that acceptance of the FEIS and approval of the development be contingent on first achieving responsible remediation of hazardous contamination left from previous uses.	12	We should not rezone Site unless/until we know what the remedial actions are; the remedial actions occur; and we can determine that they are effective to allow the proposed uses or otherwise meet the degree of remediation we desire.	14	14E	Y	Y	5.5	As legislative bodies charged with rezoning decisions, the Ithaca City Council and Ithaca Town Board have full discretion over the rezoning of the Site. However, as noted in PH Comment Summary Response No. 3 above, the NYSDEC has exclusive authority to select appropriate remedial measures. As such, although the City Council and the Town Board could decide to not rezone the Site until after the remedial actions have been selected or occur, such a delay would not affect the remediation required by the NYSDEC in a positive manner. The NYSDEC will select specific remedies for the Site based on established protection of groundwater standards or cleanup objectives for the planned residential, commercial and/or industrial uses at the Site through approval of the IRM Work Plan and the ROD amendment. The IRMs are likely to be completed Fall 2017 and the ROD amendment is likely to occur the first quarter of 2018. The NYSDEC will determine these remedial measures regardless of the rezoning of the Site unless NYSDEC has reason to believe or otherwise become concerned that the rezoning may not occur at all, in which case remediation of the Site will most likely be to an industrial standard as is the case currently.
5.5-12	Public Health and Environment	Mitigation	5.5.1.19 Additional Investigation / Remediation "In general, the NYSDEC is anticipated to require the following regardless of use: As indicated above, the future remedial work required will be based on the results of additional investigation and proposed uses of the Site and as such, specific remedies cannot be determined at this point in time" The lists subsequent to the quotes above contain numerous possible remediation/mitigation strategies that, for all intents and purposes, can not be meaningfully commented on until NYSDEC actually determines specific courses of action. This is a fundamental problem with this DGEIS, in that it largely promises future studies and decisions related to significant issues, but requires substantive commentary before those determinations are made.	12	We should not rezone Site unless/until we know what the remedial actions are; the remedial actions occur; and we can determine that they are effective to allow the proposed uses or otherwise meet the degree of remediation we desire.	15	15K	Y	Y	5.5	In addition, the Project Sponsor has stated that delaying the rezoning until the NYSDEC amends the ROD will jeopardize the Project, which in turn could further delay or otherwise derail remediation of the Site or result in remediation that is limited to industrial standards. Emerson's commitment to remediating the property is tied to the Project Sponsor's proposed uses at the time ownership transfers to the Project Sponsor. The Project Sponsor has stated that it is not willing to take ownership of the Site until it has received the necessary approvals for the Project, which includes completion of the SEQRA review for the Project, rezoning and site plan approval of Phase I. A delay in making a rezoning and site plan decision until remedial actions are established when such delay will not impact the remediation required but could postpone or discourage the Project Sponsor from taking title to the Site and begin redevelopment may not be overall beneficial to the community.
5.5-12	Public Health and Environment	Mitigation	Once the site is occupied, we will not be able to get to the bottom of anything, as in many cases we would have to get underneath the buildings. Failing to clean out the toxins will kill people. If you are looking for a legal way to kill random strangers, this is it.	12	Sources of contamination must be dug out and removed from the Site.	19	19AC	Y	Y	5.5	As noted above in PH Comment Summary Response No. 3, at this point, the Lead Agency is evaluating a number of mitigation measures to ensure impacts from environmental contamination are avoided and/or mitigated to the maximum extent practicable. This is likely to include but is not limited to inclusion of thresholds and/or mitigation measures to ensure that the Site: (1) is remediated to restricted residential, commercial and/or industrial remedial objectives, as appropriate based on the proposed uses at the Site; (2) will be subject to appropriate use restrictions consistent with the proposed uses at the Site; (3) will be subject to appropriate prohibitions on the use of groundwater at the Site without approval from the NYSDEC; (4) will be subject to development and implementation of an appropriate SMP; and (5) will be subject to on-going monitoring that institutional and/or engineering controls are being properly implemented and/or maintained.
5.5-12	Public Health and Environment	DEC Approvals Before GEIS Approval	And I can tell you that is troubling from a lay perspective and also as a legislature who is being asked to provide permission by zoning for the process to continue. I would like to see more concrete steps. I would like to know based on the fact that the site has been somewhat delineated now and the contamination has been known about for a considerable period of time, I would like to see what the outcome of these discussions between the developer and Emerson and DEC are going to be, how these things are going to take shape over the next however many years it takes to implement them. But I'm hesitant as a legislator to grant what amounts to a blank check to allow for a significant development to take place without knowing whether or not the allowance for the uses that are proposed are going to be, they are going to result in uses that are happening on a severely contaminated site.	12	We should not rezone Site unless/until we know what the remedial actions are; the remedial actions occur; and we can determine that they are effective to allow the proposed uses or otherwise meet the degree of remediation we desire.	6	6C	Y	Y	5.5	
5.5-13	Public Health and Environment	Mitigation	In order to protect the community and assure remediation, all development should be limited to the existing footprint before other development takes place.	13	To protect the community and assure remediation, all development should be limited to the existing footprint before other development takes place.	14	14F	Y	Y	5.5	The first phase of the Project entails redevelopment of four existing buildings (21, 24, 33 and 34). While subsequent phases of development will be determined as the Project proceeds, the Project Sponsor has informed the Lead Agency that it intends to continue with redevelopment of the core industrial buildings as its next phase of the development. However, the Project Sponsor has explained that if remediation of the core area to a degree that allows for its safe development and occupancy should take longer than suitable to allow for a successful Project, it may be necessary for the Project Sponsor to develop clean portions of the Site while contaminated areas continue to be remediated.

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											<p>The Lead Agency also notes that Emerson has committed to the Project Sponsor to proceed with remedial efforts to allow reuse of the Site in a timely, diligent manner. Such commitment is evident by Emerson's recent submission of an IRM Work Plan to NYSDEC for approval. The Project Sponsor's consultant believes that given the contamination delineated by all the investigations and the menu of remedies likely to be applied at the Site, remedial actions in the core areas of the Site should be implemented to the degree necessary to safely allow reuse within two to three years of remedy selection. In addition, any source area removal required by the NYSDEC to improve significantly the groundwater quality would receive priority. Emerson is already giving these areas priority by submitting an IRM Work Plan, which in part, addresses those areas of soil impacts above protection of groundwater standards.</p> <p>The Lead Agency is also mindful of the fact that remediating groundwater with contamination in a fractured bedrock setting similar to the Site and larger Property (i.e., firewater reservoir) can take many years and even decades after the remedial system has been installed. However, so long as potential exposure to the occupants of the Site and public at large has been addressed through the remedies selected such as, for purposes of example only, vapor intrusion mitigation systems and capping of impacted soils, and the groundwater system(s) are designed and constructed in a fashion that the redevelopment will not interfere with its/their operation, redevelopment activity can occur while groundwater treatment is ongoing.</p> <p><i>As noted above in PH Comment Summary Response No. 3, at this point, the Lead Agency is evaluating a number of mitigation measures to ensure impacts from environmental contamination are avoided and/or mitigated to the maximum extent practicable. This is likely to include but is not limited to inclusion of thresholds and/or mitigation measures to ensure that the Site: (1) is remediated to restricted residential, commercial and/or industrial remedial objectives, as appropriate based on the proposed uses at the Site; (2) will be subject to appropriate use restrictions consistent with the proposed uses at the Site; (3) will be subject to appropriate prohibitions on the use of groundwater at the Site without approval from the NYSDEC; (4) will be subject to development and implementation of an appropriate SMP; and (5) will be subject to on-going monitoring that institutional and/or engineering controls are being properly implemented and/or maintained.</i></p>
5.5-14	Public Health and Environment	Mitigation	5.5.2 Potential Impacts "This has initiated a process with NYSDEC whereby Emerson (the responsible party) is required to and is performing a Phase II Supplemental RI to delineate the newly discovered AOCs and evaluate the need and method of remediation necessary to address these AOCs to at least an industrial use standard." Requiring cleanup to industrial-use standards on certain portions of the site should only be considered if it is determined that current and potential impacts from industrial-use areas on areas with more stringent standards are not of concern.	14	Less stringent cleanup standards, such as industrial, should only be considered if it is determined that current and potential impacts from that area will not impact the areas with more stringent cleanup standards.	15	15M	Y	Y	5.5	The Lead Agency understands that the NYSDEC is required to evaluate a number of factors when selecting a remedy, including mobility of hazardous waste. Per State law, a remedy or remedies cannot be selected that is not protective, both on- and off-site, of human health and the environment.
5.5-15	Public Health and Environment	Mitigation	The areas identified as CW4 are proposed by the developer to be cleaned up to Industrial Standards. However, due to the i) high levels of soil and groundwater contamination found in Areas of Concern 28, 29, 30 and 31 exceeding RR and Industrial Standards, and ii) proximity of these areas to streams and waterways with known stormwater erosion issues (see photos and comments above), and iii) immediate impact of stormwater on neighboring residential properties and the Southwest Flats with known flooding issues whereby floodwaters disperse to numerous residential and commercial properties and Six Mile Creek, spanning many acres and taking days to drain, and iv) fact that Six Mile Creek is a tributary that feeds into the Cayuga Lake Watershed and is a source of drinking water for Bolton Point and residents throughout the area, and that Six Mile Creek provides economic, recreational and aesthetic value to Tompkins County, I request that the CW4 area be redrawn to be limited to Buildings 33 and 34 and that all other areas be re-classified as CW3, and all soil and groundwater be required to be remediated to Restricted Residential standards.	15	The CW4 area should be smaller to reduce the number of impacts the contamination has on stormwater and entire watershed and so that more area will be remediated to Restricted Residential Standards.	8	8K	Y	Y	5.5	<p>The commenter correctly points out that the level of remediation required by the NYSDEC in CW4 will be less than the level of remediation at other areas of the Site because CW4 is proposed for non-residential uses. The Project Sponsor indicates that the size and scope of the CW4 area is driven by a desire to appropriately reuse existing industrial structures. Those buildings situated in the CW4 are more appropriate for reuse as industrial buildings, rather than for additional residential uses. However, because certain proposed allowed uses in the CW4 such as "warehousing" are classified as "commercial" by NYSDEC for purposes of applying the use based soil cleanup objectives. Much of the CW4 will be remediated to the commercial use soil cleanup objective instead of the less stringent industrial use cleanup objective. Sheets 1-13 found within Appendix E6 of the FGEIS depicts which area of CW4 will be remediated to NYSDEC's commercial use standard and which area will be cleaned up to the industrial standard.</p> <p>Nonetheless, the Lead Agency notes that even as an industrial sub area, impacts by contamination to stormwater runoff will be addressed through remedial actions such as capping, excavation, in-situ soil stabilization, or other remedial alternatives for soils discussed in Sections 5.5.1.19 and 5.5.2 of the DGEIS. A SMP, which includes a soil excavation/management plan, groundwater management plan, community air monitoring plan and health and safety plan, will also be in place to protect the watershed from site contamination during construction of other instances of soil disturbance. Also, as part of the Site Management Plan, monitoring and regular reporting to the NYSDEC will be required to ensure any caps or other engineering controls remain in place.</p> <p>Additionally, the Project Sponsor indicates that the NYSDEC regulations specifically provide that an area using commercial or industrial cleanup objectives employ appropriate removal or engineering controls to address migration to be protective of adjacent residential uses. 6 NYCRR § 375-6.7(c). For soil remediation in industrial areas where impacted soils are left in place, the NYSDEC will require a cap existing of at least one foot of clean soil or the area to be covered by buildings or pavement. Such a cap combined with regular monitoring and reporting of the cap condition to the NYSDEC is protective of stormwater and adjacent areas and will likely be included as a threshold.</p>

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5.5-16	Public Health and Environment	Existing Conditions	Finally, upon remediation of the spills, the property owner is responsible for replacing down gradient water and sewer systems and trenches and implementing containment strategies to ensure that contaminated soil and groundwater will not continue to migrate off-site or into municipal storm water systems." In a crowding world complicated by climate change, clean water is our most precious resource. Failure to clean up these old pollution problems will create new ones for our community's heirs.	16	Contaminated soil and groundwater must be addressed through containment strategies and replacing downgradient water and sewer systems and trenches to ensure migration off-site or into municipal sewers will not continue.	20	20BC	Y	Y	5.5	As detailed in the DGEIS and PH Comment Summary Response No. 1, a dual-phase vacuum extraction (DPVE) and treatment system has been operating at the Site to capture and treat impacted groundwater and soil vapor from the firewater reservoir/Operating Unit 1 (OU-1) area since 1996. The Project Sponsor has explained that DPVE is a process where soil vapor and groundwater are simultaneously removed. The removal of the groundwater depresses the groundwater table and exposes impacted areas such that those areas can be susceptible to volatilization with air. Since soil vapor can be extracted at a more rapid rate, the vapor phase can remove contaminants quicker than the water phase. Thus, removal and treatment of both soil vapor and groundwater increases the overall contaminant removal. Several upgrades to this system have been completed by Emerson over the years, including the expansion of the system in the summer of 2015 to provide further hydraulic control, i.e., containment and treatment of impacted groundwater. The recent upgrades to the extraction system were designed based upon investigation activities completed between 2009 and 2011. The investigations focused on identifying the presence or absence of dense non-aqueous phase liquid (DNAPL) or residual source material in groundwater immediately south and east of the Firewater Reservoir. The results of the investigations showed no evidence of DNAPL or residual source material in groundwater at these locations. The highest VOC concentrations in groundwater were found to occur approximately 18 feet below the base of the reservoir within two bedding plane fractures identified at 550 and 544 feet above mean sea level (amsl). These fractures, as well as a deeper bedding plane fracture at 515 feet amsl, were noted by Emerson's consultant as the primary migration pathways for affected groundwater at the Firewater Reservoir. The objectives of the system modifications were: (1) intercept impacted groundwater within the horizontal bedding plane fractures in the C-zone between 550 feet, 544 feet, and 515 feet amsl to the south and east of the Firewater Reservoir; and (2) extract both aqueous- and vapor-phases for treatment. Specifically, the treatment system modifications included:
5.5-16	Public Health and Environment		So it brings me back to what Rich has said. Until we know what the cleanup plan will be, the comprehensive cleanup plan of the area will be, it is very hard from a zoning standpoint, from a planning standpoint, from a legislator who ultimately will represent a significant portion of these residents, it's hard to put forward a plan that says we want residential housing here. And I feel stuck in this chicken and egg scenario.	16	Contaminated soil and groundwater must be addressed through containment strategies and replacing downgradient water and sewer systems and trenches to ensure migration off-site or into municipal sewers will not continue.	8	8AN			5.5	<ol style="list-style-type: none"> 1. Installation of a new extraction well (EW-9R-72C) to target extraction of impacted groundwater and vapor from the bedding plane at 515 ft. amsl. 2. Conversion of existing monitoring well MW-14C to an extraction well in order to target the bedding planes at 550 and 544 ft. amsl. 3. Conversion of existing monitoring well EXB-2 to an extraction well in order to target the bedding planes at 550 and 544 ft. amsl. <p>See Supplemental Pre-Design Investigation Fire Water Reservoir, June 30, 2011 in Appendix E1 of the FGEIS.</p> <p>Monitoring of this system is to be continued as part of the remedy in this area of the Property, which is not part of the Site.</p> <p>In addition to the dual-phase extraction and treatment system upgrades, any additional areas in which the off-site migration of impacted media is possible will be addressed through remedy selection. One objective of the recently completed Phase II Supplemental RI was to assess for potential off-site migration of impacts identified in other areas of the Site. The Phase II Supplemental RI delineated the nature and extent of contamination in other areas of the Site and did not identify any other areas where contamination is migrating off the Site. The investigation included on-Site sewers and discovered that some sludges within manholes contained contaminants at concentrations that require remediation. The Lead Agency's review of the IRM Work Plan Emerson recently submitted to NYSDEC indicates that the work proposed includes removal and off-site disposal of residual liquids and solids from designated manholes, evaluation of pipe integrity, and investigation of soil conditions beneath certain sections of the sewer pipe that were previously identified as potential areas of concern. See IRM Work Plan under Appendix E6 of the FGEIS.</p> <p>A report titled South Hill Sanitary Sewer Network Alternatives Analysis Report dated September 3, 2009 by WSP evaluated potential options to address impacts. The report concluded that excavation of a portion of the sewer line within Turner Place and East Spencer Street should occur (approximately 300-ft. section), the sewer line replaced and a venting system installed to address soil vapors within the bedding materials of the sewers. The NYSDEC approved the planned action; however, it is understood that citizen's concerns has stalled its implementation.</p>

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5.5-17	Public Health and Environment	Mitigation	This memo documents some of my concerns about the high levels of Trichloroethene (TCE) present in and under the site for the Chain Works District (CWD), as proposed in the Draft Generic Environmental Impact Statement (DGEIS) accepted as complete by the City of Ithaca Planning Board, acting as Lead Agency, on March 8, 2016. On page 5-51, the DGEIS states: 5.5.1.14 Soil Vapor Intrusion - The Phase II ESA included soil vapor intrusion (SVI) evaluations in select buildings to confirm previous SVI results and to assess previously untested buildings, which had the potential for SVI issues. As a result of previous investigations and the Phase II ESA testing the following buildings at the Site require SVI monitoring or mitigation:-Mitigation of Buildings 1, 2 (basement portion), 3, 3A, 4, 4A, 5, 6, 6A, 8, 9, 10, 18, 21, 24, 33 and 34 (it should be noted that NYSDOH recently reduced the Air Guideline for TCE and the buildings listed account for this change; however, the Phase II ESA report was completed prior to this change and therefore some buildings were not indicated in the Phase II ESA that are now included above. -Monitoring of Buildings 13A, and 17 These are examples of buildings where recent tests indicate excessive TCE: [Building, Intended Use, Indoor Air Test Result (micrograms/cubic meter) [1, Office/Multi-use, 2.5] [2, Residential, 2.3, 2.1] [4, Residential, 4.7] [5, Residential, 80] [6, Residential, 80] In addition, on page 5-60, the DGEIS states: Groundwater impacts above groundwater standards will likely require remediation and/or monitoring. Specifically, this means the following areas will most likely require further monitoring and/or remediation: I. TCE in Groundwater & Soil – Building 24. Specifically, groundwater impacts were identified above the Part 703 Groundwater Standards and soil in this area also exceeded the Part 375-6 Protection of Groundwater SCOs. As such, this area will likely require addressing regardless of use or development. To its credit, Emerson installed sub-slab depressurization systems in area OU3 homes (downhill from the plant site) which had indoor air levels of TCE at 0.8 microgram/cubic meter	17	On-site trichloroethene contamination and related vapor intrusion issues must be addressed.	10	10B	Y	Y	5.5	The Lead Agency understands that trichloroethene (TCE) contamination is being addressed in the firewater reservoir area through a Dual Phase Vacuum Extraction System, which is not part of the Site. The Phase II Supplemental RI (see Appendix E7 of the FGEIS) delineates the extent of TCE impacts on the Site. Emerson is in the process of evaluating remedial alternatives to address contamination, including TCE, at the Site as part of the Feasibility Study. As previously discussed, the NYSDEC will evaluate the data and issue an amended ROD that will address any necessary remediation of TCE and other contaminants discovered at the Site.
5.5-18	Public Health and Environment	Mitigation	5.5.1.14 Soil Vapor Intrusion "As a result of previous investigations and the Phase II ESA testing the following buildings at the Site require SVI_monitoring or mitigation: • Mitigation of Buildings 1, 2 (basement portion), 3, 3A, 4, 4A, 5, 6, 6A, 8, 9, 10, 18, 21, 24, 33 and 34" - Mitigation strategies should be detailed on a building-by-building basis. Currently, there are no specific mitigation measures proposed.	18	Disclose each building's specific vapor intrusion mitigation measure.	15	15G	Y	Y	5.5	The Lead Agency understands that the specific vapor intrusion mitigation method will depend on the final building construction/development planned and the subsurface conditions of that building, specifically the sub-slab 'communication' or ability for vapors or air to flow beneath the slab. The Lead Agency further understands that, in general, the mitigation measures will all include radon-type systems which essentially consist of PVC piping that extends below the floor slab where a void space is created in order to collect/extract vapors. The piping runs to above the building roofline where a fan is placed to create the suction beneath the floor slab and extend a pressure field or capture zone. Alarms are used to monitor the system. All mitigation systems will be created in this general fashion. According to the Project Sponsor's environmental consultant, in the event that there is poor sub-slab communication, a variation to the traditional radon-type system is to place a drain board (i.e., thin board with void space to allow a place to collect vapors from) on top of the existing slab and pour a new concrete slab on the drain board. This approach would be used in areas where the existing sub-surface is too 'tight' to allow a comprehensive vacuum to be established. A preliminary assessment of some buildings has been completed to evaluate the system type. Of the buildings assessed, the following is anticipated: Non-Drain Board System – Buildings 3 (portion of building), 8, 10, 21, 24 (basement level), 33, 34; and, Drain Board System – Buildings 3 (portion of building), 4, 6A, 24 (upper level). The Lead Agency anticipates that it will require appropriate vapor intrusion mitigation be established at the Site Plan review stage. All mitigation systems will require a design approved by the NYSDEC/NYSDOH and will include post mitigation monitoring to confirm the efficacy of the system.
5.5-19	Public Health and Environment	Mitigation	No Action Alternative list several remedial activities. What is the timeline for these in the case of no action?	19	What is the timeline for remedial activities listed under the No Action Alternative?	1	1AR	Y	Y	5.5	The Project Sponsor has indicated that the Project cannot move forward under the No Action Alternative and that it would not take title to the Site if the No Action Alternative was selected. As such, any remedial activity under the No Action Alternative to remediate to industrial standards would continue to be undertaken by Emerson pursuant to the current ROD. It is unclear what the timeline for remediation would be without the Project.

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5.5-20	Public Health and Environment	Boundary Reassessment	Has a response from DEC been received on the BA report?	20	Has DEC responded to the Boundary Assessment report?	1	1AK	Y	Y	5.5	Since the DGEIS was issued and per the Project Sponsor, Emerson, in consultation with the Project Sponsor, the NYSDEC, and NYSDOH, elected to perform additional soil vapor testing at select locations along the NCR sewer line as described in the Soil Vapor Delineation Letter Work Plan dated June 2, 2016 and the NYSDEC letter approving the work plan with conditions dated July 5, 2016. See FGEIS Appendix E5. The results along with the results of other investigations performed in the south section of the Site are summarized in Emerson's petition to modify the area of the Site subject to its Consent Order, the ROD amendment and the Inactive Hazardous Waste Site Registry by removing the undeveloped land on the south portion of the property, approximately 36.8 acres, from the scope of those instruments and any remedial obligations thereunder. The purpose of the additional sampling was to better delineate potential soil vapor impacts as one moves further from the centerline of the existing sewer. The results are discussed below in PH Comment Summary Response No. 21. The Lead Agency's review of the petition indicates that the basis for Emerson's request is the fact that additional investigation in the south portion of the Site has not revealed impacts requiring remedial action. As a part of Emerson's proposal, an environmental easement a total of eighty feet wide would be placed over the sewer lines coming from the former NCR property and Ithaca College to prevent the potential for soil vapor intrusion into habitable buildings constructed in the vicinity of or whose sewer laterals would attach to those sewer systems. The Project Sponsor has informed the Lead Agency that another alternative that NYSDEC is considering is to leave the eighty feet wide sections of the south end of the Site that follow the NCR and Ithaca College sewer lines as part of the Inactive Hazardous Waste Site program while releasing the remainder of the south end of the Site from remedial obligations.
											The Project Sponsor has informed the Lead Agency that the NYSDEC may grant the petition through the process of issuing an Explanation of Significant Differences document. NYSDEC's program policy, DER-2 (last revised April 1, 2008), sets forth the process by which it makes changes to selected remedies. NYSDEC considers redefining the boundaries of what constitutes the site for purposes of remediation as a change in the selected remedy. The policy divides such changes into three categories, minor, significant and fundamental. The degree of change dictates the procedure used to make the change. A "significant" change, which the Project Sponsor understands to be the category NYSDEC has placed the petition for site boundary modification, is defined as one that impacts an essential part of the remedy. A "fundamental" change involves a new approach to the remedy or may add/subtract significant components of the remedy. A "minor" change is one with little to no impact. For significant changes, NYSDEC issues an Explanation of Significant Difference which is a notice that a change to a remedy has been made. Formal amendment to the ROD is not deemed necessary because NYSDEC is not reconsidering the overall remedy. While a formal comment period or public meeting is not required, if there is significant public interest, a public meeting and comment period may be conducted. Concurrence from NYSDOH is required before final approval. It is unknown at this time whether the NYSDEC will require a public comment period or hold a public meeting before making a decision on the requested change to what constitutes the Site subject to remedial obligations.
5.5-21	Public Health and Environment	Existing Conditions	Two, I think it's kind of a problem for me thinking about that sewer line that runs through the southern end of the property. Back in the '80s there was a pretty substantial leak in the town portion of that line. So whenever there was a substantial rainstorm sanitary products, feces, urine, obviously you can see the stuff in the stream flow. So it would be a wild assumption on my part to think that NCR, the previous owner of the South Hill Business Campus, was such a good citizen that they never dumped any contaminations into their property and this didn't migrate anywhere beyond that, particularly when the sanitary sewer leaked substantially.	21	What are the impacts from the NCR sewer line?	5	5B	Y	Y	5.5	The NCR sewer impacts are due to an off-site source of volatile organic compounds (VOCs) that originated from the South Hill Business Park Campus. Testing has been completed numerous times as part of the investigation of the sewer. Testing in 2007 included soil vapor testing above the sewer line in order to assess potential migration of contamination within the sewer or along its bedding. This testing identified elevated levels of chlorinated VOCs in the soil gas. The highest concentration of VOCs were identified slightly downgradient of where the Ithaca College sewer connects to the NCR sewer. See soil vapor point SV-51 on Figure 3 from WSP March 1, 2016 Boundary Reassessment Soil Vapor Sampling Report, FEIS Appendix E4. As shown on this figure, 1,1,1-trichloroethane (TCA), perchloroethene (PCE) and trichloroethene (TCE) were identified in the soil vapor sample. To further evaluate the extent of impacts, additional sampling was completed in April and November 2015. This testing consisted of collecting additional samples in proximity to previous sampling areas. Results of this testing indicated that concentrations of VOCs in soil gas generally reduce as distance from the NCR sewer increases. See Figure 4 from WSP March 1, 2016 Boundary Reassessment Soil Vapor Sampling Report. However, due to sample SV(2)-51-12 with elevated concentrations of VOCs, additional sampling was proposed by Emerson and was implemented in August 2016. The August 2016 testing utilized a passive soil gas sampling approach in combination with traditional soil vapor testing at two locations in order to correlate the passive soil gas test results with the previous soil vapor testing. The NYSDEC and NYSDOH approved the approach and the work was implemented in August 2016. The testing included installation of a grid of passive soil gas samplers extending up to 90 ft. from the NCR sewer. The highest VOC concentrations detected in the passive soil gas samplers was at location PSG-16 which was located approximately 30-ft. from the NCR sewer line. The line of passive soil gas samplers extending east away from the sewer decreased with distance from the sewer until the furthest location (PSG-13) which was non-detect. An exception to this was the northern most line of passive soil gas samplers where the concentrations slightly increased with distance from the sewer; however, the concentrations detected were only slightly above the minimum detection limit and were significantly lower than the concentrations detected in PSG-16 and PSG-13. As such, the results of this additional testing also support the premise that concentrations of VOCs decrease with distance from the sanitary sewer. The above described investigations are presented in a Petition for Boundary Reassessment to NYSDEC from WSP dated 2017 and is included in Appendix E2 of the FGEIS.
5.5-22	Public Health and Environment	Mitigation	..., and contingent upon soil gas vapor test results from the NCR sewer that were still forthcoming at the time of DGEIS publication. Also, see above comment, regarding 5.5.1.19.	22	Will sidewalk shown over NCR sewer easement create health risks to users of the trail?	15	15NB	Y	Y	5.5	According to the Project Sponsor's consultant, the NCR sewer impacts are due to an off-site source of volatile organic compounds (VOCs) and at the low concentrations seen in soil vapor in the vicinity of the sewer line, VOC impacts are not a concern for sidewalks and other open air settings. The Project Sponsor further notes

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5.5-23	Public Health and Environment		And I do know that when we talk about systems and homes, whether or not we're talking about heating systems or air conditioning, water, sewer and so on, they don't work all the time. And we put a tremendous amount of faith in mitigation systems. And when we know that there is an danger underground, I don't have the reliance or the confidence that leaving it there and putting in a soil vapor intrusion system or other system or capping it is actually going to ensure an environment that is going to be protected and safe for the residents who will live there, many of which as I've indicated will be primary school and our youth.	23	Fire Water Reservoir contamination is still concerning.	8	8AM			5.5	Contaminated groundwater from the firewater reservoir area is being contained, extracted, and then treated through a Dual Phase Vacuum Extraction System. This system was recently upgraded in order to increase the capture area. The system is routinely monitored and is equipped with automated alarms. The routine monitoring also includes quarterly groundwater monitoring of wells to confirm the efficacy of the system in regards to capture of the groundwater within the plume area and a decreasing trend in groundwater impacts. Emerson calculates that the extraction system has removed over 125-pounds of volatile organic compounds from groundwater and 2,101-pounds of volatile organic compounds from vapor between January 2009 and December 2014, before the system was most recently upgraded in the summer of 2015. Sub-slab depressurization systems (i.e., vapor mitigation systems) have been installed in numerous residences down-gradient of the firewater reservoir area to mitigate potential indoor air exposure issues associated with the historical impacts from the firewater reservoir. Ownership and responsibility for the firewater reservoir area (OU-1) and off-site impacts from the Property (OU-3) shall remain with Emerson. It is not part of the Site nor the Project.
5.5-24	Public Health and Environment	Off-Site Investigation	Ideally, comprehensive investigation of "the site" should be expanded to include adjacent "off-site" areas with a known or suspected history of dumping, disposal or suspected pollution pathways.	24	Off-site areas with suspected or known impacts should also be addressed.	15	15JB	Y	Y	5.5	Emerson will continue to be liable for off-site areas with suspected or known impacts under the Consent Order, while the Project Sponsor is responsible for mitigating off-site impacts of the Project (e.g., impacts directly related to PUD/PDZ and/or conceptual site layout plan itself, such as viewshed impact that requires off-site screening).
5.5-24	Public Health and Environment	Existing Conditions	5.5.2 Potential Impacts "As previously noted, multiple AOCs were found to have contaminants exceeding their cleanup standards for groundwater and soil, including TCE, barium, cyanide, and petroleum product. Areas of the Site, including the driveway area, Rice Paddy (area southwest of Building 34) and sediments in ditches, which are down gradient from the core structures, were found to have heavy metals, PCBs, VOCs, and SVOCs in the soil, sediment and groundwater exceeding their NYSDEC cleanup standards. If not addressed, over time these contaminants can have impacts to the public health and the environment. (emphasis added)". Given the known impacts to surrounding neighborhoods and the decades-long existence of contamination, the DGEIS should reflect the reality that unaddressed contaminants have already impacted the public health and environment. Again, for this reason, investigation and remediation efforts should not be limited to the site, but expanded to include all areas potentially impacted by the site.	24	Off-site areas with suspected or known impacts should also be addressed.	15	15L	Y	Y	5.5	
5.5-25	Public Health and Environment	Existing Conditions	5.5 Public Health and Environment 5.5.1.1 Investigations "At the time of the work, some of the soil gas sampling could not be completed due to high water table. WSP recently completed the soil gas sampling activities and subsequent to receiving the analytical results on addendum to the Boundary Reassessment will be provided to the NYSDEC." The results of deferred soil gas sampling should be disclosed in the GEIS to allow for public comment on the request to decouple the southern 34-acre portion of the site from the IHWDS (Inactive Hazardous Waste Disposal Site).	25	Additional site testing discussed in DGEIS should be disclosed in FGEIS.	15	15E	Y	Y	5.5	The Phase II Supplemental RI, which provides the additional testing discussed in the DGEIS, has been completed by Emerson and a draft final report that incorporates NYSDEC comments has been submitted to the NYSDEC for its final approval. A copy of the submitted draft final Phase II Supplemental RI report is attached to the FGEIS as Appendix E8.
5.5-25	Public Health and Environment	Existing Conditions	5.5.1.8 Sediments & Seep "These sediment areas are located down gradient (northwest) of Buildings 17/18 and Building 34. Based on the impacts above the NYSDEC sediment criteria, these two sediment areas will be further evaluated by the property owner, to delineate the extent of sediment impacts." - The results of sediment testing for the areas identified above should be disclosed if known, or the testing timeline should be indicated.	25	Additional site testing discussed in DGEIS should be disclosed in FGEIS.	15	15F	Y	Y	5.5	

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5.5-26	Public Health and Environment	Existing Conditions	5.5.2 Potential ImpactsThe DGEIS acknowledges that, "Areas of the Site, including the driveway area, Rice Paddy (area southwest of Building 34) and sediments in ditches, which are down gradient from the core structures, were found to have heavy metals, PCBs, VOCs, and SVOCs in the soil, sediment and groundwater exceeding their NYSDEC cleanup standards. [...] Furthermore, impacts in subsurface soils can be a concern in the event that future ground intrusive work encounters these impacts and they are not properly handled. Impacts in groundwater can migrate off-site and based on geologic setting and hydrology at the Site can present in surface water downgradient in locations where bedrock fractures outcrop at the surface creating seeps." Has the applicant/DGEIS considered the necessity of additional, voluntary soil testing during Phase I? Specifically, during excavation, filling, and compacting activities for: Rehabilitation of Driveways I, II, and IV, Rehabilitation of the parking areas for Buildings 21 and 24, Construction of new parking areas for Buildings 33 and 34, and Connection of the utility services for Buildings 21, 24, 33, and 34	26	Has the applicant/DGEIS considered the necessity of additional voluntary soil testing during Phase I of the redevelopment?	18	18AE	Y	Y	5.5	The Project Sponsor has informed the Lead Agency that it does not intend to perform "voluntary" soil testing during redevelopment at the Site. However, the Project Sponsor will be implementing a NYSDEC-approved Site Management Plan. The soil excavation plan, a typical component of a site management plan, will dictate the need for any additional testing of soils that may be required during redevelopment of the Site. In addition, a Community Air Monitoring Plan will be implemented that entails monitoring the air at the boundaries of the construction area for VOCs and fugitive dust. When applicable standards are exceeded, the work will cease until corrective action is taken to prevent the exceedance. In addition, the Lead Agency has reviewed the results of the Phase II Supplemental RI and conclude that it has sufficiently delineated the nature and extent of contamination at the Site, including impacts to soil, to allow the Lead Agency to make its required finding under SEQRA. As noted above in PH Comment Summary Response No. 3, at this point, the Lead Agency is evaluating a number of mitigation measures to ensure impacts from environmental contamination are avoided and/or mitigated to the maximum extent practicable. This is likely to include but is not limited to inclusion of thresholds and/or mitigation measures to ensure that the Site: (1) is remediated to restricted residential, commercial and/or industrial remedial objectives, as appropriate based on the proposed uses at the Site; (2) will be subject to appropriate use restrictions consistent with the proposed uses at the Site; (3) will be subject to appropriate prohibitions on the use of groundwater at the Site without approval from the NYSDEC; (4) will be subject to development and implementation of an appropriate SMP; and (5) will be subject to on-going monitoring that institutional and/or engineering controls are being properly implemented and/or maintained.
5.5-27	Public Health and Environment	Mitigation	(cont'd) The restrictive declaration can be useful as a way of "fine tuning" the use or bulk controls of the standard district regulation where there are features of a site or proposed project that appear to require specialized conditions or restrictions. It can also be useful as a way of ensuring that such conditions and restrictions remain binding on the land even if the proposed project presented in an application does not move forward to completion and different development takes place.	27	A Restrictive Declaration should be used on the Site to ensure protection of public health before zoning changes are granted.	8	8AA	N	N	5.5	
5.5-27	Public Health and Environment	Mitigation	(cont'd) The restrictive declaration is a covenant running with the land which binds the present owners and all successors. It, therefore, gives notice to future owners of the conditions and restrictions that are continuously binding on the land.	27	A Restrictive Declaration should be used on the Site to ensure protection of public health before zoning changes are granted.	8	8AB	N	N	5.5	
5.5-27	Public Health and Environment	Mitigation	(cont'd) A Restrictive Declaration on the property will be protective of human health by allowing the property to be developed in phases, enables site-specific requirements be established and met regarding known Areas of Environmental Concern, retains municipal control over zoning changes that may take decades to implement, and runs with the property so as to apply to any and all future property owners.	27	A Restrictive Declaration should be used on the Site to ensure protection of public health before zoning changes are granted.	8	8AC	N	N	5.5	
5.5-27	Public Health and Environment	Mitigation	(cont'd) NYC Code § Section 43-1416: Definitions2 n. "Restrictive declaration hazardous material site" means a property with an institutional control, arising from a city environmental quality review and recorded by the property owner, which requires a potential hazardous material condition to be addressed to the office's satisfaction before the property can be developed or an action involving soil disturbance can be undertaken.	27	A Restrictive Declaration should be used on the Site to ensure protection of public health before zoning changes are granted.	8	8AD	N	N	5.5	
5.5-27	Public Health and Environment	Mitigation	(cont'd) o. "Recognized environmental condition" means the presence or likely presence of any hazardous substances on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances even under conditions in compliance with laws. The term does not include de minimus conditions that generally do not present material risk of harm to public health or the environment.	27	A Restrictive Declaration should be used on the Site to ensure protection of public health before zoning changes are granted.	8	8AE	N	N	5.5	

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5.5-27	Public Health and Environment	Mitigation	(cont'd) Remediating Contaminated Sites in New York Under the E-Designation Program 3 40 The E- Designation rules apply where one or more tax lots are in an area that is subject to a zoning amendment and are not under the control or ownership of the person seeking the zoning amendment and have been identified as likely to be developed as a direct consequence of the rezoning action. 15 RCNY §24-02. Therefore, for those lots under the control or ownership of the person seeking the zoning amendment DEP requires a Restrictive Declaration to ensure that required sampling and remediation occur prior to issuance of any DOB permit and that development otherwise proceeds in a manner that is protective of human health and the environment. The Restrictive Declaration is recorded in the land records and is binding on all future owners or lessees or assigns. Thus, the Restrictive Declaration can be an effective tool for ensuring that the site use remains unchanged and that no alterations occur to the site without DEP approval to ensure potential impacts from hazardous materials has been properly addressed.	27	A Restrictive Declaration should be used on the Site to ensure protection of public health before zoning changes are granted.	8	8AF	N	N	5.5	An environmental easement is already required under the 2009 ROD amendment to: (a) limit the use and development of the Property to industrial use (it is anticipated that the ROD amendment will amend this requirement so that residential, commercial, and industrial uses are allowed at the Site); (b) comply with an approved site management plan; (c) restrict the use of groundwater as a source of potable or process water without necessary water quality treatment as determined by NYSDOH; and (d) require the property owner to complete and submit to the Department a periodic certification of institutional and engineering controls. Elements (b) through (d) of the environmental easement described above are not expected to change with the ROD amendment, but the content of the Site Management Plan of course will. It should be noted that although the City and the Town are allowed to place reasonable restrictive covenants on the Site as a condition to a rezoning, municipalities are preempted from holding environmental easements. Environmental Conservation Law § 71-3605(7). The Lead Agency believes that the remedial actions selected by the NYSDEC for the Site through the ROD Amendment process, along with the existing consent order and contractual commitments of Emerson to remediate the Site to allow development of the conceptual site layout plan, and the environmental easement held by the NYSDEC to hold the Project Sponsor accountable for its on-site activities will be sufficiently protective of human health and environment.
	Public Health and Environment	Mitigation	(cont'd) Although the below flowchart outlining the Australian rezoning guidelines is different from the Restrictive Declaration program used by NYC, it is nonetheless informative in demonstrating how needed pauses and checks are required before zoning decisions are made. Taken from Managing Land Contamination Planning Guidelines, New South Wales Dept. of Urban Affairs and Planning, Environmental Protection Agency, 1998. P234 https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&sqj=2&ved=0ahUKEwjuyLWxiezMAhXD7R4KHfpTCi0QFggcMAA&url=https%3A%2F%2Fwww.planningportal.nsw.gov.au%2Fsites%2Fdefault%2Ffiles%2Fmanaging_land_contamination_planning_guidelines_sepp_55.pdf&usq=AFQjCNHQihCwQUfSAaCmHpnHrdbK6ZZQ&sig2=vQFPJymhs-53-ybYdVOpaA	27	A Restrictive Declaration should be used on the Site to ensure protection of public health before zoning changes are granted.	8	8AG	N	N	5.5	
5.5-27	Public Health and Environment	Mitigation	Please find below my comments on Public Impact on Health and the Environment and Related Mitigation as outlined in the March 8, 2016 Chain Works dGEIS. I am sending this by email to Ms. Nicholas, Ms. Karen Cahill and text online at https://chainworksdistrict.com/geis/ . Comment on proposed PUD and PDZ rezoning with regard to addressing extensive contamination on site and protecting human health. Without the Chain Works District Development, the Morse Chain/Emerson property is unlikely to see environmental clean-up of the "multiple areas of concern where contaminants exist, exceeding their cleanup standard for groundwater, soil and / or sediment, including barium, other heavy metals, cyanide, petroleum, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). If not addressed, these contaminants can have impacts to public health and the environment." (ES-5) In order to support the Chain Works District Development plan, while also providing both the City and Town with the ability to ensure that all applicable environmental cleanup standards have been met before legal changes in land use through a PDZ or PUD are granted, the City and Town should establish a Restrictive Declaration on the property, such as is used in NY City and elsewhere, to ensure protection public health before zoning changes are granted. Please see the following citations for reference and context: Use of Restrictive Declarations 1 - As a condition of certain special permits and some zoning changes, the Commission may require applicants to sign and record a restrictive declaration that places conditions on the future use and development of their land. These conditions may be designated to control building design or land use or to require that impacts caused by the development be mitigated by the provision of a public space or facility.	27	A Restrictive Declaration should be used on the Site to ensure protection of public health before zoning changes are granted.	8	8Z			5.5	

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5.5-28	Public Health and Environment	Existing Conditions	Related, in Appendix G4 – Phase II Supplemental RI Work Plan, Page 44, Figure 3, Generalized Fence Diagram A-A', the estimated horizontal extent of bedding fracture zones is displayed. On what scientific basis were the bedding fracture zone boundaries defined? How was the boundary defined if zone thickness was measured across just one monitoring well that was not proximal to another monitoring well? Were previous geophysical log data used for this analysis?	28	How were bedding fracture zone boundaries identified?	18	18AG	Y	Y	5.5	<p>According to the Project Sponsor's environmental consultant, bedding planes and fractures have been defined in a number of ways. Numerous bedrock wells have been installed since 1987 and rock cores have been obtained from a majority of the wells to assess the rock type and fractures (over 100 bedrock wells and associated rock cores have been installed/assessed). See WSP Supplemental RI Report dated April 4, 2008, attached as Appendix G2 of the DGEIS. Additionally, in July 2005 a Geophysical Survey consisting of Electrical Resistivity imaging was completed to assess potential water-bearing zones in the bedrock (documented in the Geophysical Survey Investigation Report dated October 31, 2005 by WSP and a Supplemental Geophysical Survey Report dated November 27, 2006 by WSP. Both of these reports have been added to Appendix E9 of the FGEIS). Electrical Resistivity imaging is a tool used to remotely image the subsurface by installing electrodes in a survey line and applying a measured current. The voltage across electrodes is measured and the voltage/current ratio is used to evaluate resistance. This imaging identifies high and low resistivity zones which were then assessed through exploratory borings. The exploratory borings were advanced via rotary drilling equipment and including coring of bedrock and retrieving the bedrock cores to assess bedding planes and fractures. This large data set has been utilized in identifying the geology and hydrogeology of the site.</p> <p>The Lead Agency notes, as explained above, that ultimately it is for the NYSDEC to evaluate this data and take such information into account in establishing appropriate remedial measures in the Amended ROD.</p>
5.5-29	Public Health and Environment	Existing Conditions	5.5.1.8 Sediments & Seeps Some technical language must be clarified. The DGEIS states in Chapter 5, Section 5, Subsection 1, Point 8: Sediments & Seeps on page 5-49, "A resampling of that seep performed by Emerson was non-detect for all of the constituents mentioned. [...]Figures 6A, 6B, and 7A of the Phase II ESA (included in Appendix G1) illustrate the location of sediment and seep samples and summarize the significant sediment and seep sampling results." However, if one follows the reference to Appendix G1 of the Phase II ESA, one will locate what may (cannot be certain because of vague referencing of sample numbers on page 5-49) be the two samples mentioned in the DGEIS: B18-SEEP 1 and B18-SEEP 2. Apparently these samples were taken 10 minutes apart, on August 28, 2013, as per the Spectrum Analytical lab report on page 1008 of Appendix G1. What was the implied meaning of "resampling"? It would be more appropriate to call this process "duplicate sampling." If one sample contained a significant contaminant concentration and a second sample was non-detect, then that scenario would warrant a resampling at a later time. Please clarify.	29	Clarify the "resampling" process of the B-18 seep.	18	18AH	Y	Y	5.5	<p>According to the Project Sponsor's environmental consultant, the Phase II ESA included sampling of two seeps from the basement of Building 18. The seeps are essentially locations where groundwater is infiltrating the basement. Emerson later re-sampled one of the seeps, which identified TCE. The original sample from the Phase II ESA and re-sample by Emerson (which LaBella observed) were collected by simply placing the appropriate laboratory supplied bottles (40-milliliter glass vials with hydrochloric acid as a preservative) beneath the seep and allowing the bottles to fill with zero headspace (i.e., no air bubbles). The bottles were then placed on ice and shipped to the laboratory for analytical testing. The results indicated no chlorinated volatile organic compounds above groundwater standards. See Phase II Supplemental Remedial Investigation Report dated November 14, 2017, attached to the FGEIS as Appendix E7.</p>
5.5-30	Public Health and Environment	Existing Conditions	Specifically, we support Brock's statement as follows: "The Supplemental RI Work Plan should be expanded to include (a) investigation and characterization of the depth and breadth of the B18-SEEP-1 and B18-SEEP-2 contamination; (b) investigation as to the impact of both the Building 24 plume on Turner Place and the LD-SEEP-3/MS-IOB plume on South Cayuga Street municipal water and sewer systems and trenches; and (c) impact of the plumes on downgradient properties.	30	B18-SEEP-1 and B1-SEEP-2 should be investigated further to characterize the depth and breadth of the seep contamination.	20	20BB	Y	Y	5.5	

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5.5-30	Public Health and Environment	Mitigation	Please find below my comments on seeps as outlined in the March 8, 2016 Chain Works dGEIS. I am sending this by email to Ms. Nicholas, Ms. Karen Cahill and text online at https://chainworksdistrict.com/geis/. Comment on seeps. Please see G 1 Phase II ESA - March 2014, Section VII (page 14) Sediments and Seeps. ESA Statement: Based on surface contours and drainage ways at the Site, sediment samples were collected to evaluate potential areas of accumulated contaminants. Drainage areas are located down gradient of the main plant building and samples of sediment from two drainage areas identified concentrations of S VOCs, Metals, Pesticides and PCBs at concentrations that exceed the criteria identified in NYSDEC Technical Guidance for Screening Contaminated Sediments (1999). These sediment areas are located down gradient (northwest) of Buildings 17 /18 and Building 34. The extent of sediments and impacts to sediments (depth and lateral extent) were not evaluated within the scope of the initial Phase II ESA. Based on the impacts above the NYSDEC sediment criteria, the two sediment areas below the main plant building appear to warrant further evaluation of these impacts to support a Restricted Residential use for this Site. Four seep samples were also analyzed. One seep sample was collected from below the former transformer pad on the western side of Building 24. This seep flows into a drainage feature that runs parallel to Building 24 and flows to the north. This sample was analyzed for PCBs and VOCs; although PCBs were not identified above laboratory method detection limits, TCE was detected at a concentration over 6 times the Groundwater Standard in this sample. In addition, CVOC impacts of shallow soil were identified in the vicinity of this seep in the split soil sample collected from LBA-MW-24 by WSP. This seep sample is also noted in the discussion in Building 24 VOCs as it is downgradient of groundwater impacts identified in that area. Also, one of two seep samples collected from the basement of Building 18 (numerous pipes with running water were observed entering the basement) identified concentrations of cis-1,2-DCE and Vinyl Chloride.	30	BI8-SEEP-1 and BI-SEEP-2 should be investigated further to characterize the depth and breadth of the seep contamination.	8	8AH			5.5	Further investigation of B18-SEEP-1, B18-SEEP-2 and the Building 24 seep was completed as part of the Phase II Supplemental RI, for which a draft report was submitted to the NYSDEC in August 2016. Concentrations of targeted compounds (including those which were previously identified above groundwater standards) were not identified above their respective the NYSDEC groundwater standards in samples B18-SEEP-1 and B18-SEEP-2. Trichloroethene (TCE) was detected above the NYSDEC groundwater standard of 5 micrograms per liter (ug/L) in the sample from the Building 24 seep, which is actually discharge from a pipe. The TCE concentration in water from the Building 24 pipe was detected at a concentration of 40.7 ug/L. The discharge from this pipe currently flows into an 18-inch diameter corrugated high-density polyethylene culvert installed in the ditch and treated for VOCs using an activated charcoal boom.
5.5-30	Public Health and Environment	Mitigation	(cont'd) (b) investigation as to the impact of both the Building 24 plume on Turner Place and the LD-SEEP-3/MS-IOB plume on South Cayuga Street municipal water and sewer systems and trenches;	30	BI8-SEEP-1 and BI-SEEP-2 should be investigated further to characterize the depth and breadth of the seep contamination.	8	8AI			5.5	
5.5-31	Public Health and Environment	Mitigation	As indicated in the Figures above and in the Supplemental RI – April 2008, approximately 200 55-gallon drums were removed from the wooded areas both on and off the property between 1980 and 2004. A great number of these drums were located off of Emerson's property, and clear indication shows they were placed there in association with industrial activities conducted on-site. This area is steeply sloped, is directly affected by and exposed to the impacts of erosion and storm water. Movements of soil and water through this area immediately affects neighboring residential homes and properties and storm water collection systems which discharge into Six Mile Creek and Cayuga Lake. Residential properties on South Cayuga Street, Spencer Road and Morris Heights Road are downgradient of these drum disposal sites. City Storm Water swales downgradient of this area drains through the residential Titus Flats area and into Cayuga Inlet. Other than 5 shallow borings (0.5' bgs) performed in Area A, where PCB Aroclor 120 was found in 3 of 5 samples, the other three drum storage locations in AOC #10 has not been investigated or characterized for soil or groundwater contamination in either the 2014 or 2015 Phase II investigations. The DEC should include a complete investigation into all 4 locations in AOC #10 for soil and groundwater contamination as part of the 2016 Supplemental Remedial Investigation Work Plan. Any contamination found must be remediated to Restricted Residential Standards.	31	AOC 10 (drum disposal area, mostly off-site) needs to be investigated and remediated.	8	8G	Y	N	5.5	AOC 10 is partially located off-Site and partially in the CW1 Sub Area, a conservation zone to be used for passive recreation along the western portion of the Site and the balance of AOC 10 is off-Site. WSP Supplemental RI Report dated April 4, 2008, attached as Appendix G2 of the DGEIS. AOC 10 is a drum disposal area that includes three or four separate geographic areas on and mostly off-Site (which is not a part of this GEIS) but a portion of AOC 10 extends into the CW1 Sub Area. As documented in Section 3.1.9. of the WSP Supplemental RI Report dated April 4, 2008 and summarized in the LaBella Phase I report, empty drums have been discovered and removed from AOC 10 on various occasions since 1970. The most recent investigations and remedial efforts were completed in 2004 and 2005 and are documented in a February 22, 2005 letter by Environmental Strategies Consulting, LLC, which is attached to the FGEIS as Appendix E10. As documented in this letter, a survey of the wooded areas on and adjacent to the western portion of the Site was conducted in December 2004 and additional drums/containers were identified. Subsequently, in December 2004 and January 2005 the drums were removed and soil sampling of shallow soils beneath the drums was completed under the NYSDEC oversight. Because passive recreational use is a "Commercial Use" under New York State regulations, the Commercial Use SCOs will therefore apply to CW1. 6 NYCRR § 375-1.8(g)(2)(iii). Based on the 2005 shallow soil samples, three (3) out of the fourteen (14) locations that were sampled can be identified as having contaminates above the Commercial Use SCOs laid out in Table 375-6.8(b) of 6 NYCRR Part 375: • DL-6, where benzo(a)pyrene was found at 2,800 ppb (the SCO for Commercial Use is 1,000 ppb) • DL-12, where benzo(a)pyrene was found at 1,700 ppb • DL-12, where benzo(a)pyrene was found at 1,700 ppb DL-6, DL-12, and DL-14 are all located along the hillside between the west side of the buildings and the former railroad bed. Like other areas of the Site, the NYSDEC will determine whether excavation, capping, and/or another remedy is appropriate to remediate those areas in AOC 10 above the Commercial Use standards under the amended ROD. The Site Management Plan will also dictate what monitoring and maintenance will be required. Potential drum disposal areas were also investigated during the WSP's 2008 Supplemental RI when WSP investigated a depression in the wooded area located southwest of Building 34 that appeared to contain drums in a 1976 aerial photograph. See Area A on Figure 4 of the Supplemental RI. WSP took five (5) shallow soil samples from different points in the area and tested for VOCs, SVOCs, TAL metals, and PCBs. None of these samples, however, identified contaminates above the Unrestricted Use Soil Cleanup Objectives laid out in Table 375-6.8(a) of 6 NYCRR Part 375.

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5.5-32	Public Health and Environment	Existing Conditions	Please find below my comments on barium, cadmium and reactive sulfides contamination as outlined in the March 8, 2016 Chain Works dGEIS. I am sending this by email to Ms. Nicholas, Ms. Karen Cahill and text online at https://chainworksdistrict.com/geis/ . Comment on barium, cadmium and reactive sulfide contamination. Please see GI Phase II ESA - March 2014. Section VIII (page 4, 10) Residual Building Materials & Concrete. Figures 4 and 9. Table SE and 68. ESA Statement Summary: Residual materials and concrete within the buildings were tested and TCLP Metals were identified above the characteristic of hazardous waste criteria. This was found in: a) Salt Pot Area Residual Material (building 13A, 14) b) Salt Pot Area Concrete (building 13A, 14) (Barium found at 19.6 times hazardous waste criteria)- Salt Pot 1, B13A-MW-2, B13A-MH-3 c) Former Plating Area (building 34 - slated for industrial use) (Cadmium found at 2.03 times hazardous waste criteria)- 834-CC-1 d)Residual Materials in Sanitary/Wastewater Conveyance Piping, Manholes & Pits Reactive Sulfides exceeding landfill hazardous waste criteria were found in concrete in buildings, 4, 8 and 13A. B13A-MH3, 84-MW1, 88-MW-1 Comment: The G4 Phase II Supplemental RI Work Plan does not include plans to further investigate or characterize the hazardous contamination imbedded in concrete in walls and floors identified in la, b, c, and 2 above. Figures and Tables in the GI Phase II ESA notes that Building 13A and Building 34 was impacted by plating activities, and describes the limited testing that was conducted as part of the ESA, stating further that more investigation is needed.	32	More investigation of impacts and potential impacts to walls and floors of Buildings 13A, 34 and 4 should occur.	8	8X	Y	Y	5.5	The Phase II ESA included assessment of concrete utilizing an X-Ray Fluorescence meter, which evaluates for heavy metals. This screening was conducted at 263 screening points within 21 buildings, including Buildings 4, 13A, and 34. The screening in these buildings included Building 4 (6 locations), Building 13A (37 locations), and Building 34 (42 locations). Known/documented areas of chemical use were included in the screening in addition to a grid-like pattern used to cover remaining portions of the building. This testing identified elevated metals concentrations in Building 34 which will require addressing during remediation and/or redevelopment. Additional investigation was conducted within Building 13A in areas proximate the former salt baths located within Building 14 as documented in the Phase II Supplemental RI. Revised Supplemental Pre-Design Investigation Report by WSP dated April 22, 2013 and is included in the FGEIS as Appendix E11. A portion of the building 4 floor slab was removed in 2012 and concrete sampling was also conducted at that time. The floor slab removal in building 4 was part of an investigation into the source of volatile organic compounds in AOC #1.
5.5-32	Public Health and Environment	Existing Conditions	(cont'd) As buildings 13A and 34 are slated to be retained and reused for industrial use, and building 4 is slated for residential use, expanded investigation of contamination in concrete and residual materials should be included in the G4 Supplemental RI Work Plan.	32	More investigation of impacts and potential impacts to walls and floors of Buildings 13A, 34 and 4 should occur.	8	8Y	Y	Y	5.5	
5.5-33	Public Health and Environment	Mitigation	5.5.1.15 Contaminated Building Materials "In addition to the salt pot area of Building 14, the Phase II ESA revealed concrete floors with sulfide impacts in Buildings 4, 8, and 13A and cadmium impacts in Building 34 at concentrations that most likely require remediation." The DGEIS should state unequivocally whether mitigation for cadmium will be required in Building 34 and, if required, what the mitigation strategy would be.	33	How will cadmium impacts in Building 34 be addressed?	15	15H	Y	Y	5.5	According to the Project Sponsor's consultant, the cadmium impacts identified in Building 34 are impacts to concrete, which will likely be addressed (subject, of course, to the NYSDEC approval and oversight) through removal of all of the concrete or simply scarifying the surface of the concrete. Scarifying the surface involves removing the uppermost layer of concrete which is where the cadmium impacts likely resolve. The Project Sponsor further indicates that under either approach confirmatory testing of the concrete that remains would be completed to assess efficacy of the work and removal of the concrete would continue until confirmatory sampling indicated that the concrete no longer contains cadmium above applicable standards.
5.5-34	Public Health and Environment	Mitigation	There's going to be fugitive dust problems.	34	Fugitive dust from working on this contaminated Site need to be addressed.	7	7B	Y	Y	5.5	Fugitive dust will be addressed throughout the remediation and redevelopment phases of the Project through the use of a NYSDEC approved Site Management Plan (SMP) and a Community Air Monitoring Program (CAMP), which is part of the SMP. The SMP puts into place the procedures and requirements for all subsurface activities at the Site. These requirements will include dust control measures such as wetting excavation surfaces or applying other dust suppression techniques. The CAMP will provide specific plans/requirements for air monitoring. The air monitoring will include upwind and downwind air monitoring stations during all ground intrusive work within the boundaries of the site that remain on the Registry to ensure that fugitive dust is not a concern for downwind receptors/residents. The CAMP will identify specific action levels that will require activities to cease and/or additional dust control measures to be implemented prior to proceeding with the work. The implementation of a SMP with a CAMP with the safeguards highlighted above is anticipated to be established as a threshold.
5.5-35	Public Health and Environment	Boundary Reassessment	5.5.1.18 Boundary Reassessment Study "Three surficial and three subsurface soil samples contained concentrations of p cresol or metals above their unrestricted use SCOs. There are no spatial distribution trends and these compounds are not related to the historical operations at the Site". The distribution trends and source of the pollutants is secondary to their existence at levels above "unrestricted use" soil cleanup objectives. Since this area is currently envisioned for residential use, remediation strategies to achieve applicable standards should be detailed.	35	P-cresol and metals above unrestricted use cleanup standards noted in Boundary Reassessment Study should be remediated.	15	15I	Y	Y	5.5	The Lead Agency understands that the NYSDEC has completed the review of the Boundary Reassessment work and the NYSDEC defined the scope of the required remediation and/or environmental easements as part of that review which is included in Appendix E of the FGEIS. See also PH Comment Summary Responses Nos. 20 and 21. As noted by the Project Sponsor, the report notes that there was no fill material or debris found where the p-cresol and metals were detected and the presence of these compounds in those areas were not indicative of impacts associated with historical operations. In addition, the concentrations of these compounds appear to be localized and none of these compounds were found in the groundwater sample from the well placed down-gradient of these areas. The Project Sponsor anticipates that, based upon all of these facts, the NYSDEC may very well determine that remediation of these localized areas with slight exceedances of p-cresol and metals will not be necessary to be protective of human health and the environment.
5.5-35	Public Health and Environment	Mitigation	5.5.3 Mitigation Measures "Assuming the Boundary Modification request to NYSDEC to release the southern most portion of the Site is successful, no remediation requirements will apply to the CW2 Sub Area. However, if such request is not successful the Restricted Residential SCOs will also apply to CW2 along with any institutional and engineering controls that are applied to the remainder of the Site." The presence of constituents above "unrestricted-use" SCO's in CW2, and the envisioned residential use seem to indicate that some remediation could be necessary prior to construction, based on site-specific analyses ...	35	P-cresol and metals above unrestricted use cleanup standards noted in Boundary Reassessment Study should be remediated.	15	15NA	Y	Y	5.5	

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5.5-36	Public Health and Environment	Existing Conditions	5.5.1 Existing Conditions -This section in the scoping document (Scope 5.5.1, p.26) promises a more detailed history, but the history provided in DGEIS 5.5.1 (p. 5-43) provides no more detail than what appears in the scoping document.	36	The DGEIS is not specific enough about the historical operations at the Site.	18	18AD	Y	Y	5.5	Section 2.3 of the DGEIS, Background and History, is intended to be a summary of historical operations at the Site; for more detailed information, please refer to the December 13, 2005 Onsite Assessment, 2013 Phase I Environmental Site Assessment, March 2014 Phase II Environmental Site Assessment, and the additional documents, figures, and photographs all attached as Appendix G1 to the DGEIS.
5.5-37	Public Health and Environment	Mitigation	I am in favor reestablishing the Ithaca's Superfund.	37	I am in favor of reestablishing the Ithaca's Superfund.	16	16FB	Y	Y	5.5	The Lead Agency is not aware of the Ithaca Superfund or what, specifically, this commenter is referring to. Nonetheless, the Lead Agency notes that the NYSDEC will make the final decision about what remedies will be implemented at the Site. However, as noted above in PH Comment Summary Response No. 3, at this point, the Lead Agency is evaluating a number of mitigation measures to ensure impacts from environmental contamination are avoided and/or mitigated to the maximum extent practicable. This is likely to include but is not limited to inclusion of thresholds and/or mitigation measures to ensure that the Site: (1) is remediated to restricted residential, commercial and/or industrial remedial objectives, as appropriate based on the proposed uses at the Site; (2) will be subject to appropriate use restrictions consistent with the proposed uses at the Site; (3) will be subject to appropriate prohibitions on the use of groundwater at the Site without approval from the NYSDEC; (4) will be subject to development and implementation of an appropriate SMP; and (5) will be subject to on-going monitoring that institutional and/or engineering controls are being properly implemented and/or maintained.
5.6-1	Historic and Archaeological Resources	Historic Structures	Pg 5-65: There is reference to architectural guidelines in the Design Standards to protect historic character	1	No Summary.	1	1AU	Y	Y	5.6	No architectural guidelines are included as part of the project. Design Standards address building form and disposition and relationship to the pedestrian experience but do not cover subjective aesthetic or stylistic elements of the buildings. These will be addressed by the appropriate Planning Board during Site Plan Review.
5.7-1	Transportation	Analysis Data	The study should clarify on what basis the existing, base condition, and future with-development conditions signal timing/phasing assumptions were based.	1	No Summary.	21	21V	Y	Y	5.7	According to the Project Sponsor's traffic consultant, the signal timing information was based upon a combination of City of Ithaca SYNCHRO files, NYSDOT SYNCHRO files (specifically for the intersections of State Street/Fulton Street and Fulton Street/Meadow Street/Clinton Street), and field checks. Refer to Page 5-72 of the DGEIS for more detail on the sources of traffic data utilized in the traffic analysis.
5.7-1	Transportation	Permitting	The SYNCHRO model provided indicates that the driveway immediately south of the city/town line is proposed to be utilized during this phase. We do not see an issue with this driveway being utilized for Phase I, provided the required Phase I mitigation is completed.	1	No Summary.	22	22B	Y	Y	5.7	The comment is acknowledged.
5.7-2	Transportation	Analysis Data	A list of the intersections reanalyzed per the addition of the 203 apartment units described on page 5-108 should be provided for review.	2	No Summary.	21	21AK	Y	Y	5.7	Per to the Project Sponsor's traffic consultant, the following intersections were reanalyzed: <ul style="list-style-type: none"> • NYS Route 96B at Site Access Driveways 1, 3, 4, and 5 • NYS Route 96B/Grandview Avenue • Aurora Street/Prospect Street/Clinton Street • Aurora Street/State Street • Cayuga Street/Seneca Street • Cayuga Street/Clinton Street • State Street/Stewart Avenue
5.7-3	Transportation	Trip Distribution	Further information on the methodology used to estimate origin/destination of trips to and from the site should be provided to justify assumed trip distribution.	3	No Summary.	21	21I	Y	Y	5.7	The proposed arrival/departure distribution of traffic to be generated by the Project is based on several key parameters, including the following: <ul style="list-style-type: none"> • Employment centers; • Retail centers; • Population centers; • Ithaca College; • Cornell University; • Existing traffic patterns; and • Existing traffic conditions and controls <p>Using existing traffic volumes, the Project Sponsor's traffic consultant calculated percentages of entering and exiting trips entering and exiting the study area. This information, in turn, provided the basis for calculating trip distribution for the Site. A particular trip distribution was generated for each sub-area of the Project with the understanding that access controls and circulation varied between areas of the Site.</p> <p>A summary of trip distribution pattern percentages for each area of the Site is provided on pages 5-92 to 5-96 of the DGEIS with a more detailed explanation included in DGEIS Appendix I.</p>

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5.7-4	Transportation	Trip Distribution	Based on a review of the projected site trip distribution, it appears that a higher percentage of vehicles accessing the site from Cayuga Street/Albany Street from the north and Clinton Street/Green Street Seneca Street might access the site via the Cayuga Street and Turner Place access point than what is assumed in the study. Given this potential, there is concern that additional traffic would impact the character of these existing, low traffic, narrow dead-end roadways. This raises significant concerns for the impacts on these roadways whether these are appropriate access points for the proposed site.	4	No Summary.	21	21C	Y	Y	5.7	<p>The Project Sponsor's traffic consultant has carefully evaluated this comment and provides the following analysis in response:</p> <p>Cayuga Street and Turner Place have historically served as access points to the Site and continued use for Site access is appropriate. First, in terms of the impact of the Project on the character of these streets, it is important to differentiate traffic impacts from a resident's perspective versus the typical drivers' perspective. Traffic impact studies typically evaluate impacts on Levels of Service. The concept of Levels of Service as defined in the Federal Highway Administration's Highway Capacity Manual, represents "a qualitative measure describing operational conditions within a traffic stream, and their perception by motorists and/or passengers."</p> <p>While traffic flow measures in this context are solely from the driver's perspective, an equally important measure which is generally lacking in most traffic impact studies involving residential areas is to instead take into account a resident's viewpoint of traffic. As noted in this comment, the influence of traffic on the quality of life (or livability) of the residents within the vicinity of the project is often as important a consideration as impacts on Levels of Service.</p> <p>Each person's concern for traffic and its impact on his/her quality of life is a function of numerous variables: traffic volume and speed, vehicle composition, temporal distribution of traffic, dwelling setback from the street, presence of children, and numerous resident demographic factors. As such, no one single volume threshold at which residents normally become irritated can be generally applied. The type of roadway and the perception the roadway exhibits to the residents greatly influences the threshold levels. Residents' complaints about traffic volumes escalate whenever the actual conditions on the street differ from the Residents' expectations as to what conditions on that particular street should be. Although there is not a linear relationship between complaints and traffic volume, there is a certain volume range in which Resident expectations seem most likely to differ from actual conditions.</p> <p>Local street design considerations, specified in Residential Streets, Third Edition, 2001, developed jointly by the National Association of Home Builders, American Society of Civil Engineers, Institute of Transportation Engineers (ITE), and the Urban Land Institute provides definitions of the various street classifications. As well, Transportation and Land Development, Second Edition, 2002, developed by ITE was consulted. Based on the definitions provided by that document, Turner Place and Cayuga Street are categorized as Minor Residential/Local Streets with an Average Daily Traffic (ADT) range between 400 – 1,500 vehicles per day.</p>
5.7-5	Transportation	Mitigation	It is unclear from the traffic study if ingress-only or full access will be provided to the site via Cayuga Street. The site plan shows 2-way circulation. The Phase 1 trip generation figure (5.7-22) shows ingress and egress traffic, while the Phase 2 trip generation shown no egress traffic from the site.	5	No Summary.	21	21G	Y	Y	5.7	As per page 5 and 48 of the Scoping Document, the Project Sponsor is proposing 2-way circulation via Cayuga Street. The reason that Phase 2 trip generation shows no egress traffic on Cayuga Street is that trip distribution pattern percentages related to Phase 2 were not projected to utilize Cayuga Street. This is due to the location of Phase 2 development on-site and the projected travel paths to and from such development (see Response #3 above for more detail on trip distribution methodology). While there may be variability as to how many vehicles may use this street, any Phase 2 traffic is projected to be very low. Refer to the Response #4 above regarding Minor Residential/Local Street traffic volumes and Figures 5.7-25 and 5.7-26 of the DGEIS for an illustration of Phase 1 and Full Development traffic volume distribution.
5.7-6	Transportation	Trip Distribution	Traffic volumes along the main line of Clinton Street/Prospect Street are significantly different between intersections in Figure 5.7-26.	6	No Summary.	21	21AH	Y	Y	5.7	According to the Project Sponsor's traffic consultant, the difference in traffic volumes is due to: (i) temporal variations between intersections (that is, the time it takes for vehicles to travel between intersections); (ii) the impact of the traffic detour in downtown Ithaca at the time of data collection (adjustments were made to the 2014 Existing Conditions based upon historical traffic volumes collected throughout the downtown as referenced on Page 5-72 of the DGEIS); (iii) peak hours; and, (iv) the existence of side streets and driveways between the intersections along NYS Route 96B. The traffic consultant employed vehicle balancing in the analysis to achieve relative balance between intersections, where necessary.
5.7-7	Transportation	Trip Distribution	A figure should be provided showing anticipated am, pm and daily traffic at key intersections internal to the site.	7	No Summary.	21	21E	Y	Y	5.7	Acknowledged. A figure depicting the scale of trip generation based on the Conceptual Site Layout Plan is provided in the DGEIS updates (see FGEIS Figure 2.3-2). Projected turning movement counts during AM and PM peak hours will be illustrated and addressed during individual Site Plan review phases as the Project proceeds.
5.7-8	Transportation	Trip Distribution	No trip distribution is shown to site access 5 with Phase 1 development. Please clarify if this access point will be open with Phase 1 development.	8	No Summary.	21	21AG	Y	Y	5.7	The Project Sponsor informs the Lead Agency that the Site Access Driveway 5 will not be operational for Phase 1 Development
5.7-9	Transportation	Pedestrian and Bicycle Facilities	As stated in the traffic study, the pedestrian network between the site and anticipated pedestrian destinations is not complete. The internal sidewalk network is also not complete. Due to this limitation it appears some of the trip reduction assumptions for walking might be lower than assumed in the report. Further justification of the reduction or proposed improvements to the pedestrian network should be evaluated. As an example, the existing sidewalk along Cayuga Street near the site is in very poor condition.	9	No Summary.	21	21D	Y	Y	5.7	In conjunction with the Project, the Project Sponsor will improve the adjacent sidewalk network in coordination with City Staff as the Site is developed. The Lead Agency understands that the portion of the Site within the City's jurisdiction is located within Sidewalk Improvement District 4. Therefore, any development that occurs will be subject to the required associated fees for such construction projects. The internal sidewalk network will be fully developed in the Site Plan Review phase in coordination with LEED ND requirements. Thus, the trip reduction assumptions in the traffic analysis appear to be appropriate.
	Transportation	Pedestrian and Bicycle Facilities	Pedestrian-friendly: The redevelopment should provide a comfortable, safe and efficient pedestrian network with sidewalks, seating, and other pedestrian features. The City and Town should ensure that sidewalks will be provided on both sides of all streets with related amenities, including street lights and appropriate and variable landscaping.	9	Same as 21D.	17	17C	Y	Y	5.7	See Response to Comment 21D.

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5.7-9	Transportation	Pedestrian and Bicycle Facilities	5.7.3 says they will specifically analyze routes to the Commons, IC and SH Elementary, including any gaps in the routes. Also that the routes will be inventoried to include a range of things including accessibility. I don't see a specific analysis of these routes or an inventory. For example, they state that one could use sidewalks on Rt 96B to get to SH Elem, but they don't specifically state a route, how to cross Aurora St, and if there are any gaps. Lastly, the last sentence in the scope paragraph says they will evaluate the safety & operations of existing conditions as it relates to ped/bike facilities. I don't see that at all. For example, there is a sidewalk that runs up the west side of S Cayuga St, almost to the site (though there is a gap), but it is in horrible condition and certainly is not accessible or safe. Seems that this ought to be included.	9	Same as 21D.	4	4A	Y	Y	5.7	See Response to Comment 21D.
5.7-10	Transportation	Mitigation	A queue analysis is needed at the proposed site access locations to determine if anticipated queues will spill back into internal intersections or onto adjacent roadways. Available queue spacing appears especially limited exiting the site at Site Access 1.	10	No Summary.	21	21J	Y	Y	5.7	<p>The Project Sponsor's traffic consultant provided the following table which depicts the queuing results at the proposed site access driveways during Phase 1 and Full Development Conditions. Supplementary queuing analysis is provided in the DGEIS updates (see FGEIS Appendix G).</p> <p>AM PEAK HOUR QUEUING RESULTS</p> <p>Site Access Driveway Phase 1 Driveway I 20 49 46 78 52 91 160 Driveway II NA NA NA NA NA NA N/A Driveway III 7 26 36 60 19 39 211 Driveway IV 6 24 40 72 52 83 475 Driveway V NA NA 36 73 29 48 422</p> <p>PM PEAK HOUR QUEUING RESULTS</p> <p>Site Access Driveway Phase 1 Driveway I 31 69 290 358 98 154 160 Driveway II NA NA NA NA NA NA N/A Driveway III 9 29 115 231 30 52 211 Driveway IV 24 54 60 117 63 106 475 Driveway V NA NA 35 53 41 73 422</p> <p>Based on the above queuing analysis there are sufficient storage lengths at Driveways IV and V during both peak hours. Driveway III during the PM peak hour is borderline based on 95th percentile queues. However, queues of this length are expected to be infrequent and are intended to illustrate a worst-case scenario. On the other hand, Driveway I during the PM peak hour shows queues that are longer than the conceptual available storage. Accordingly, to mitigate this impact, the internal roadways interior to the Driveway I access onto Aurora Street shall be designed to mitigate potential spillback into internal intersections.</p>
5.7-11	Transportation	Existing Conditions	Capacity analysis should be provide for the intersection of Cayuga Street/Spencer Street	11	No Summary.	21	21Y	Y	Y	5.7	Acknowledged. The capacity analysis has been added to the corresponding figures which are presented in the DGEIS updates (see FGEIS Appendix G).

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5.7-12	Transportation	Mitigation	A sight distance evaluation should be provided for all proposed access points.	12	No Summary.	21	21Z	Y	Y	5.7	<p>The Project Sponsor's traffic consultant provided the following sight distance evaluation:</p> <table border="0"> <tr> <td></td> <td align="center">North</td> <td align="center">South</td> <td></td> </tr> <tr> <td>Drive I</td> <td align="center">> 500 ft</td> <td align="center">400 ft</td> <td></td> </tr> <tr> <td>Drive II*</td> <td align="center">400 ft</td> <td align="center">> 500 ft</td> <td>* - Note: Drive II is proposed to be an entrance only.</td> </tr> <tr> <td>Drive III</td> <td align="center">> 500 ft</td> <td align="center">> 500 ft</td> <td></td> </tr> <tr> <td>Drive IV</td> <td align="center">> 500 ft</td> <td align="center">> 500 ft</td> <td></td> </tr> <tr> <td>Drive V</td> <td align="center">> 500 ft</td> <td align="center">> 500 ft</td> <td></td> </tr> </table> <p>AASHTO Intersection Sight Distance is: 40 mph 445 ft 45 mph 500 ft</p> <p>Based upon the above data, there is sufficient sight distance at all the proposed access points except for Drive I, south and Drive II, north. The Project Sponsor's proposed mitigation for Driveway I includes installing advanced intersection warning signage (MUTCD W2-2L) for northbound approaching vehicles. Drive II is an entrance only and therefore does not require mitigation. In addition, NYSDOT stated a concern about sight distance for northbound vehicles (especially trucks) approaching stopped vehicles waiting to turn left into Site Access 1. This can be addressed by removing trees/brush and other obstructions within the NYS 96B right-of-way or providing a left-turn lane at Site Access Drive #1. This will be reviewed by NYSDOT and the City during the Site Plan Review phase.</p>		North	South		Drive I	> 500 ft	400 ft		Drive II*	400 ft	> 500 ft	* - Note: Drive II is proposed to be an entrance only.	Drive III	> 500 ft	> 500 ft		Drive IV	> 500 ft	> 500 ft		Drive V	> 500 ft	> 500 ft	
	North	South																																	
Drive I	> 500 ft	400 ft																																	
Drive II*	400 ft	> 500 ft	* - Note: Drive II is proposed to be an entrance only.																																
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Drive IV	> 500 ft	> 500 ft																																	
Drive V	> 500 ft	> 500 ft																																	
5.7-13	Transportation	Mitigation	Warrants should be provided to demonstrate the potential need for left-turn phasing on eastbound State Street at Stewart Avenue before and after development of Phases 1 and 2 of the site.	13	No Summary.	21	21AB	Y	Y	5.7	<p>The Lead Agency understands that the guidelines for the use of left-turn phasing described by the Federal Highway Administration (FHWA) are as follows:</p> <ol style="list-style-type: none"> Product of opposing and left-turn hourly volumes exceeds a value of 50,000 Left-turn maneuver crosses three or more lanes of opposing through traffic The posted speed limit of opposing traffic is greater than 45 MPH A recent crash history for a 12-month period indicates five or more left-turn collisions that could be prevented by the installation of a left-turn signal Sight distance to oncoming traffic is less than the minimum recommended distance 																								
5.7-14	Transportation	Complete Streets	AutoTURN analysis of the fire truck should be expanded to include access to Cayuga Street, Turner place and Site Access 4.	14	No Summary.	21	21AI	Y	Y	5.7	<p>The AutoTURN analysis has been updated to include access to Cayuga Street, Turner Place and Site Access IV. The analysis demonstrates that the fire apparatus operated by the City and Town Departments that serve the area are able to maneuver through the Site. This analysis is included in the DGEIS updates (see FGEIS Appendix F).</p>																								
5.7-15	Transportation	Analysis Data	The assumption of a 40 mph travel speed on S Aurora Street stated on Page 5-125 should be verified with a speed count.	15	No Summary.	21	21AM	Y	Y	5.7	<p>A 2006 NYSDOT Speed Count for the NYS 96B from the Ithaca City Line to CR 179 indicates that the average speed for northbound traffic is 42.3 mph and 43.3 mph for southbound traffic. This information is included in the DGEIS updates (see FGEIS Appendix F).</p>																								
5.7-16	Transportation	Analysis Data	Please provide clarification of what sections of the site pertain to "Areas A-G" shown in figures 5.7-15-21.	16	No Summary.	21	21W	Y	Y	5.7	<p>The designation of the TIS Areas corresponds to the proposed Site Plan Sub Areas as follows: Area A = CW3, Area B = CW3, Area C = CW4, Area D = CW3, Area E = CW3, Area F = CW3, and Area G = CW2</p>																								
5.7-17	Transportation	Analysis Data	A technical appendix must be provided with the HCM analysis spreadsheets, any traffic signal and turn lane warrants and trip generation and reduction analysis (including relevant sheets from Trip Generation Handbook and Shared Parking). More detailed spreadsheets illustrating the specific trip reductions for internalization, transit, walking, pass-by trips and other factors should be shown separately for verification of calculations.	17	No Summary.	21	21L	Y	Y	5.7	<p>This information is provided in the Appendices to the TIS which is located in Appendix I of the DGEIS.</p>																								
5.7-18	Transportation	Analysis Data	Analysis for signalized intersections should show operations of individual turning movements at the intersection instead of just overall level of service.	18	No Summary.	21	21U	Y	Y	5.7	<p>Acknowledged. The associated Figures have been updated (see FGEIS Appendix G).</p>																								

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5.7-19	Transportation	Mitigation	It is unclear which of the mitigation measures listed in the report the applicant is proposing to accomplish as part of developing the site and which mitigation measures are recommended by the traffic study, in general. A list of the proposed mitigation measures (signal optimization, road diets, other) by the applicant should be provided with associated timeline in development when the mitigations measures will be implemented.	19	It is unclear which of the mitigation measures that are listed in the DGEIS the applicant is proposing to accomplish as part of developing the site and which mitigation measures are recommended by the traffic study, in general. A list of the proposed mitigation measures (signal optimization, road diets, other) by the applicant should be provided with associated timeline in development when the mitigations measures will be implemented.	21	21AA	Y	Y	5.7	<p>Page 5-131 of the DGEIS highlights the proposed mitigation measures for the Project. These measures are divided between Phase 1 of the Project and post-Phase I development at the Site. The Project Sponsor informs the Lead Agency that Phase 1 has a proposed build-out timeframe of approximately two years. The remaining phases are projected to be developed over a period of eight years following occupancy of Phase 1. Nonetheless, it is acknowledged that future development beyond Phase 1 has a moderate degree of variability. Therefore, traffic mitigation measures should be commensurate to identified traffic impacts, as well as be responsive to potential deviations from the proposed Project phasing and timeline.</p> <p>Relative to Phase 1, the Project Sponsor shall introduce and implement Transportation Demand Management (TDM) strategies to reduce Single Occupancy Vehicle (SOV) trips to and from the Site. The following TDM strategies have been proposed for Phase 1 implementation:</p> <ul style="list-style-type: none"> • Market-priced parking • Preferential parking for ridesharing services • Bicycle parking facilities • Subsidized transit passes • Connections to transit stops (i.e. construct sidewalks to existing stop at Hillview Place) • Dedicated shuttle service • Transportation Alternatives Information • Coordination with Smart Trips Ithaca • Connected and improved pedestrian network on and adjacent the Site (i.e., improvements to sidewalks within Sidewalk Improvement District #4) • Pedestrian oriented design within the Site • Bicycle network facilities within the Site and connections to nearby Gateway Trail • Follow CPTED principles in all design • Coordination with Ithaca College and South Hill Business Park <p>It is noted that these TDM strategies are consistent with actions Ithaca Tompkins County Transportation Council (ITCTC) has identified in the 2035 Long Range Transportation Plan (LRTP) and Cornell University's tGEIS TDM program. Several of these TDM actions will need to be implemented on a tenant by tenant basis. The Lead Agency understands that Washington State's Commute Trip Reduction (CTR) program and CTR Efficiency Act, a law passed by the State Legislature, requires local governments in urban areas with traffic congestion to develop programs that reduce SOV trips and Vehicle Miles Travelled (VMT) per capita. This program targets workplaces with 100 or more full-time employees. The Project Sponsor has committed to adapt and scale this program to the projected employment centers proposed within the CWD as part of the Post Phase 1 mitigation.</p> <p>In conjunction with Phase 1, the traffic study also recommends the update and optimization of the City's traffic signal network. Specifically, signal timing adjustments can be used to decrease delay at Clinton Street/Cayuga Street and Seneca Street/Cayuga Street. The Project Sponsor will work with the City to implement this mitigation.</p> <p>In order to mitigate post Phase 1 traffic impacts to the maximum extent practicable, following completion of Phase 1, the Project Sponsor will implement an on-going Monitoring and Mitigation Implementation Plan (MMI Plan). The MMI Plan will include an update of traffic conditions after full occupancy of Phase 1 of the development and before the next phase of development begins to verify underlying assumptions and evaluate the effectiveness of TDM strategies. For instance, the implementation of TDM programs and the integration of the sidewalk and trail system between the Site and adjacent neighborhoods could have a greater benefit than is currently estimated. This post Phase 1 occupancy traffic update will evaluate the following intersections: (i) Aurora Street/Prospect Street/Clinton Street, (ii) Aurora Street/State Street, (iii) State Street/Seneca Way, (iv) State Street/Green Street, (v) Clinton Street/Cayuga Street, (vi) Cayuga Street/Seneca Street, and, (vii) Cayuga Street/Spencer Street. This post Phase 1 occupancy traffic update will also include an evaluation of whether a traffic signal is warranted at Driveway 1.</p>

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											<p>Post Phase 1 TDM or CTR initiatives will be implemented as follows:</p> <ul style="list-style-type: none"> o Transit Coordination – Continued coordination with TCAT on transit routes and marketing the nearby routes of 65 and 11. TCAT bus line will boost ridership through increased awareness coupled with improved service. o Route Expansion – Working with TCAT to provide new/expanded bus service through the Site provides an opportunity for greater mode choice resulting in trip and parking reductions. o Bus Stop Amenities – A clean, well-lit, informative bus stop with shelters and seating greatly improves the image of the transit serving an area. Bus stop amenities make taking the bus a comfortable experience, while proper maintenance tells people that transit makes up an important part of the neighborhood. o Employer Carpooling – Carpooling will be encouraged by providing incentives and other services such as ride-matching. o Emergency Ride Home – In case of a personal emergency during the day, transportation is provided at no cost to one's vehicle, residence, or other place such as childcare, doctor's office, etc. o Preferential carpool/vanpool parking – Investigate the use of vRide for employers located on the Site. o Transportation Alternatives Information – Bus schedules, walking and bicycling maps, neighborhood and on-Site wayfinding will be made readily available. o Telecommuting and compressed work schedules – Employers will be encouraged to offer flexible work options. Employee vehicle trips are reduced by the percentage of employees that telecommute or have a "free" day gained through a compressed schedule, on an average day. o Location and Quantity of Bicycle Parking Spaces – The Project will include convenient bicycle parking locations in clear sight of access points into buildings, safe and secure longer term storage within parking areas, and a sufficient number of bicycle parking spaces that encourages a greater number and demographic of residents, employees, and visitors to utilize bicycling as a means of transportation. <ul style="list-style-type: none"> o The Price of Parking – Parking spaces that are typically included in building and rental costs will be reviewed, and "unbundled" parking, paid as a separate item, will be considered. o Financial Incentive Programs – Developing Commuter Financial Incentive Programs, such as Parking Cash Out, offer employees the choice of receiving a subsidized parking space an equivalent financial incentive. o Bike Share – A micro bike share system that is developed for the Site or a more robust system that is developed for the City and Town (i.e. Lime Bike) encourage more transit ridership and provide additional public transportation options. A bike share system can offer mobility, economic, health, safety, and quality of life benefits. o Car Share – Coordination with Ithaca Carshare will be pursued during Phase I as demand potentially grows through increased residential and commercial based occupancy rates. o Relationship with Ithaca College – The Site is located less than a half-mile from Ithaca College. An integrated and coordinated approach to the development of the Site and potential for interaction between the two entities should be explored. o Electric Vehicle charging station – The County will be conducting a study to identify needs and opportunities. This could be included in the Project as an amenity to residents, and it supports the County's goals to reduce greenhouse gas emissions.

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											<p>The MMI Plan will also provide for an additional traffic study update for the first post Phase 1 development proposal within the CWD that will result in more than 75 vehicle trips per hour. Additional traffic study updates will be required for any post Phase 1 development proposals that will result in more than 150 vehicle trips per hour. The intersections to be analyzed include:</p> <ul style="list-style-type: none"> • Site Accesses 1 and 2 • Site Accesses 3, 4 and 5 (NYSDOT owned) • Aurora Street/Prospect Street/Clinton Street • Prospect Street/Turner Place • Columbia Street/Aurora Street • Aurora Street/State Street • State Street/Seneca Way (NYSDOT owned) • State Street/Green Street (NYSDOT owned) • Clinton Street/Cayuga Street • Cayuga Street/Seneca Street (NYSDOT owned) • Cayuga Street/Spencer Street • Pine Tree Road/SR 79 (NYSDOT owned) • State Street/Stewart Avenue • Turner Place corridor between site access and Prospect Street • Cayuga Street corridor between site access and West Spencer Street <p>The timing of all proposed mitigation identified in the DGEIS associated with Phase 2 will be determined based on projected trip generation of development proposals. This will ensure that the proposed mitigation at that point is commensurate with projected impacts. As part of the MMI Plan, these future traffic impact assessments to be performed at the Site driveways and intersections identified above and will provide updated trip distribution and generation figures resulting from development of the Site utilizing actual traffic assessment data. The MMI Plan will provide that additional intersections will be added to traffic updates if any previous traffic study projected a Level of Service of E or worse. These traffic impact assessments will go beyond standard theoretical capacity analysis, utilizing actual traffic assessment data, such as intersection delay studies, queuing analyses, and gap studies. Overall, the MMI Plan will be used to refine the projected traffic impacts and determine the most effective and responsive mitigating strategies. Moreover, impacts to the Site Driveways are expected to be mitigated through signalization of Driveway I and IV. As well, Danby Road/Aurora Street is recommended to be restriped, as part of a road diet, to include left turn lanes at Driveway IV and assessment data, such as intersection delay studies, queuing analyses, and gap studies. Overall, the MMI Plan will be used to refine the projected traffic impacts and determine the most effective and responsive mitigating strategies. Moreover, impacts to the Site Driveways are expected to be mitigated through signalization of Driveway I and IV. As well, Danby Road/Aurora Street is recommended to be restriped, as part of a road diet, to include left-turn lanes at Driveway IV and Driveway III. This is described on Pages 5-121 and 5-122 of the DGEIS. These improvements are recommended when the associated warrants are met and through close coordination with the City, NYSDOT and the Town of Ithaca. These additional traffic study updates shall be reviewed and considered by the appropriate Planning Boards at the site plan review stage.</p> <p>In addition to the MMI Plan, as further mitigation of traffic impacts associated with the Project, implementation of TDM will be required throughout the life of the Project. Long-term, TDM strategies may be the most effective form of traffic mitigation. For instance, one strategy to address impacts to intersections, such as Aurora Street/Clinton Street/Prospect Street and State Street/Aurora Street, is high capacity people moving systems. This strategy will require dedicated shuttles and a commitment to working closely with TCAT to expand transit routes and increase headways. Off-Site Park and Rides (existing or new) or underutilized parking lots (through shared use agreements) can be utilized to shuttle employees, visitors, and residents to and from the Site. The Lead Agency understands that an example of this is Guthrie Packer Hospital in Sayre, PA. All employees are required to park at an off-site lot and are shuttled to the Hospital. The Project Sponsor commits to providing two on-site transit stops. TCAT service is flexible and can be increased to respond to any increases in demand (i.e., vehicle trips and, ultimately, person trips). The Project Sponsor is also committed to providing, in part, resources to study the feasibility of a larger, integrated people-mover system; automated transit and gondola to/from Chain Works District. This is also supported by the 2010 Personal Rapid Transit (PRT) Feasibility Study for the City of Ithaca. Within the document, it is recognized that there are challenges to implementing such a system; however, it is consistent with the overall systems approach to transit (or similar) that ITCTC has stated in their LRTPs. This PRT was conceptually laid out through the Project to be a part of a system wide circulator system. The Project Sponsor has committed to contributing towards further study of this emerging technology.</p> <p>In order to monitor this effort and the implementation of other TDM strategies, in addition to traffic study updates, the MMI Plan will incorporate a transportation modal survey (i.e., similar to the National Household Travel Survey) to better understand the effectiveness of the TDM strategies employed on-site. Quantifiable figures, such as modal distribution or average vehicle ridership (AVR), will be used to report the effectiveness. AVR is the ratio of the total number of employees or residents to the average daily number of vehicles used. An agreed upon AVR with local officials will be determined. This is an appropriate mitigation strategy since the Project Sponsor has control over the entire site and therefore will be able to provide accurate population data including numbers and types of users. The TDM strategy evaluation will also include discussion of new or developing TDM strategies for consideration.</p>

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X-Reference	Comment Category	Comment Subcategory	Comment	Comment Summary No.	Summary of Comment	Commenter ID	Comment ID	Sub.	Rel	Relevant DGEIS	Response to Comment
5.7-20	Transportation	Mitigation	The following intersections are projected to degrade to LOS E or worse operation under Phase 2 operations. Mitigation measures should be provided to prevent this degradation. The proposed peak hour parking restriction on Eastbound E State Street at Aurora Street is not acceptable for the City. Prospect Street/ S Aurora Street, S Aurora Street/Columbia Street, S Aurora Street/Site Access 3, Cayuga Street/Clinton Street, E State Street/Pine Tree Road, E State Street/Aurora Street, E State Street/Seneca Way	20	The following intersections are projected to degrade to Level of Service E or worse operation under Phase 1 operations. Mitigation measures should be provided by the Project Sponsor to prevent this degradation: a. Prospect Street/ S Aurora Street b. S Aurora Street/Columbia Street c. S Aurora Street/Site Access 3 d. E State Street/Pine Tree Road	21	21AB	Y	Y	5.7	<p>It should be immediately noted that physical capacity-oriented improvements at intersections may not be feasible due to physical constraints. With that, the following intersections and recommended mitigation measures are described:</p> <p>a) Prospect Street/S Aurora Street – The context of this intersection and adjacency to nearby structures make physical capacity improvement difficult to implement. Therefore, TDM strategies are highly recommended to offset any adverse impact to the intersection. A thorough review of the 2035 Long Range Transportation Plan (LRTP) prepared by ITCTC showed that this corridor is in a state of congestion under existing conditions. A future land use and transportation scenario prepared as part of the report showed that an increase in alternative vehicle mix (i.e., more efficient vehicles and greater variety of higher occupancy vehicles) along with reducing Single Occupancy Vehicle (SOV) trips can reduce congestion through this area. Refer to the response for Comment ID 8 for more detail. Further analysis by the Project Sponsor’s traffic consultant using an extension of Synchro, SimTraffic, demonstrate that delays may be less than those indicated (LOS B during both AM and PM peak hours for the eastbound and westbound approaches). Delays will be even less for all other times of the day.</p> <p>The Project Sponsor’s traffic consultant considered a traffic signal for this intersection. The Lead Agency understands that the MUTCD describes nine warrants for use when determining the need for a signal.</p> <p><input type="checkbox"/> As part of this analysis, the MUTCD provides guidance on evaluating minor street traffic, particularly for approaches with separate left and right-turn lanes. In this case, the degree of conflict of Clinton Street traffic is considered to be minimal based on field observations and the capacity analysis. Therefore, the volume of traffic for this approach is not solely considered, and does not meet the warrants for a traffic signal.</p> <p><input type="checkbox"/> The volume of Project-related traffic is approximately 5-6% of the total traffic entering this intersection.</p> <p><input type="checkbox"/> Limited ROW and existing building limit the ability to add capacity through additional traffic lanes.</p> <p><input type="checkbox"/> Grade and weather considerations.</p> <p>The Project Sponsor’s traffic consultant’s SYNCHRO analysis results with a traffic signal in place are included at Appendix F of the FGEIS.</p>
5.7-21	Transportation	Mitigation	The following intersections are projected to degrade to LOS E or worse operation under Phase 2 operations. Mitigation measures should be provided to prevent this degradation. The proposed peak hour parking restriction on Eastbound E State Street at Aurora Street is not acceptable for the City. Prospect Street/ S Aurora Street, S Aurora Street/Columbia Street, S Aurora Street/Site Access 3, Cayuga Street/Clinton Street, E State Street/Pine Tree Road, E State Street/Aurora Street, E State Street/Seneca Way	21	The following intersections are projected to degrade to Level of Service E or worse operation under Phase 2 operations. Mitigation measures should be provided to prevent this degradation. The proposed peak hour parking restriction on Eastbound E State Street at Aurora Street is not acceptable for the City. a. Prospect Street/ S Aurora Street b. S Aurora Street/Columbia Street c. S Aurora Street/Site Access 3 d. Cayuga Street/Clinton Street e. E State Street/Pine Tree Road f. E State Street/Aurora Street g. E State Street/Seneca Way	21	21AC	Y	Y	5.7	<p>The intersections and recommended mitigation measures are described as follows:</p> <p>a) Prospect Street/S Aurora Street – Refer to response to Comment ID 2. Impacts to Aurora Street/Clinton Street/Prospect Street and potential mitigation does not include physical improvements to the intersection, as ROW and existing buildings limit the ability to expand the intersection. Additionally, a traffic signal is not an appropriate treatment due to the reasons described in Comment ID 2. Therefore, higher capacity people mover systems (i.e., new TCAT routes and improved headway, and potential automated transit service between the Commons and the Site or a gondola) are needed.</p> <p>b) S Aurora Street/Columbia Street – Refer to response to Comment ID 2. Traffic signal warrants are not met at this intersection to alleviate delays for Columbia Street traffic. All traffic can be accommodated, as needed, at the existing traffic signal at Aurora Street/Hillview Place. The reduction of SOV trips and increased mode share of pedestrian, bicycle, and transit trips will reduce total site generated traffic passing through this intersection.</p> <p>c) S Aurora Street/Site Access 3 – Refer to response to Comment ID 2. Delays at Driveway III are projected to decrease from LOS "F" to LOS "E" with the installation of traffic signals at Driveway I and IV. The effect of these traffic signals is described on pages 5-124 through 5-126 in the DGEIS.</p> <p>d) Cayuga Street/Clinton Street – The Project Sponsor’s traffic consultant developed signal timing adjustments for the PM peak hour and the associated capacity analysis results which are presented in Appendix F of the FGEIS. These adjustments reduce the projected LOS "E" for the northbound thru/right approach and LOS "F" for the southbound left approach to LOS "D" for both approaches.</p> <p>The Project Sponsor has had discussions with ITCTC about an automated fixed route system along Cayuga Street that would shuttle people between the Commons and the Site. The Lead Agency recommends that a feasibility study of such a system be performed by ITCTC with participation from the Project Sponsor.</p> <p>As stated in the TIS (page 5-131) and found within the 2035 LRTP, it is recommended that a review and possible upgrade of the traffic signals in downtown Ithaca be performed to address existing conditions. This would entail assessing the need for improved coordination, installation of smarter vehicle and multi-modal sensors, signal phasing priority given to transit, and an overall better integration of pedestrian and bicycle systems. Traffic signal timing updates are recommended, as well as system-wide optimization of the traffic signal network to reduce the projected delays. This will be accomplished over time as part of typical operations.</p>

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X-Reference	Comment Category	Comment Subcategory	Comment	Comment Summary No.	Summary of Comment	Commenter ID	Comment ID	Sub.	Rel	Relevant DGEIS	Response to Comment
5.7-19	Transportation	Analysis Data	The following intersections and corridors will be evaluated 1) upon completion of Phase 1 of development, 2) after an additional 75 vehicle trip ends (as projected by trip generation estimates) per peak hour after Phase 1, and 3) for every subsequent projected 150 development-related vehicle trip ends. It is our understanding that the seven locations below owned by NYSDOT will be reviewed and approved by that agency. <ul style="list-style-type: none"> • Site Accesses 1 and 2 • Site Accesses 3, 4 and 5 (NYSDOT owned) • Aurora Street/Prospect Street/Clinton Street • Prospect Street/Turner Place • Columbia Street/Aurora Street • Aurora Street/State Street • State Street/Seneca Way (NYSDOT owned) • State Street/Green Street (NYSDOT owned) • Clinton Street/Cayuga Street • Cayuga Street/Seneca Street (NYSDOT owned) • Cayuga Street/Spencer Street • Pine Tree Road/SR 79 (NYSDOT owned) • State Street/Stewart Avenue • Turner Place corridor between site access & Prospect Street • Cayuga Street corridor between site access & West Spencer St 	19	Same.	21	21AI	Y	Y	5.7	The comment is acknowledged. See Response to Comment 19 and 20.
5.7-19/20	Transportation	Mitigation	As part of a Monitoring and Mitigation Implementation Plan (MMI Plan), these future traffic impact assessments will provide updated trip distribution and generation figures resulting from development of the Site. These traffic impact assessments will go beyond standard theoretical capacity analysis, utilizing actual traffic assessment data. In addition to traffic observations, the MMI Plan will incorporate a transportation modal survey (i.e., similar to the National Household Travel Survey) to better understand the effectiveness of the Transportation Demand Management (TDM) strategies employed on-site (discussed later in this response). Quantifiable figures, such as <u>modal distribution or average vehicle ridership (AVR)</u> will be used to	19/20	Same.	21	21AJ	Y	Y	5.7	The comment is acknowledged. See Response to Comment 19 and 20.
5.7-19/20	Transportation	Mitigation	This section also states that the project will have "opportunities for enhanced public transit and connectivity between downtown, East and South Hill, and their academic institutions." However, the DGEIS doesn't describe the impact on transit service at current service levels, or what improvements TCAT might need to provide adequate service at buildout.	19/20	Same.	21	21AL	Y	Y	5.7	The comment is acknowledged. See Response to Comment 19 and 20.
5.7-19/20	Transportation	Transit	Implementation of transportation improvements are divided into those needed for Phase I and those needed at full buildout of the project. This needs to be finer grained. Check TIS	19/20	Same	18	18I	Y	Y	5.7	The comment is acknowledged. See Response to Comment 19 and 20.
5.7-19/20	Transportation	Mitigation	Who will pay for and implement off-site transportation improvements?	19/20	Same	1	1Z	Y	Y	5.7	The comment is acknowledged. See Response to Comment 19 and 20.
5.7-300	Transportation	Permitting	NYSDOT comments identify the mitigation we will require for you to commence work within our Right-of-Way (ROW) for the first stage (Phase I) of the project. All subsequent stages of this project will need to be coordinated through our Regional Traffic and Safety office to review any proposed work.	300	No Summary.	22	22A	Y	Y	5.7	The comment is acknowledged.
5.7-22	Transportation	Mitigation	A plan must be provided for proposed timing of installation of a traffic signal at site Access Point 1 and 4 relative to development.	22	No Summary.	21	21B	Y	Y	5.7	Refer to Response to #19 above (specifically the response regarding the MMI Plan) and pages 5-115 and 5-123 of the TIS for a description of the traffic signal mitigation and warrants at the proposed Access Points. During redevelopment and construction of Phase I, underground traffic signal conduit should be installed at the Aurora Street/Proposed Driveway I intersection with the assumption that a future traffic signal will be required to mitigate traffic impacts. Upon completion of Phase 1, a subsequent traffic signal warrant study will be performed to evaluate actual traffic patterns and delays at Driveway I, and determine when construction of the proposed traffic signal is warranted. Installation of a traffic signal at this intersection is projected to attract a portion of exiting vehicle trips from the Site. This will have the effect of reducing trips added to the Project driveways, specifically Driveway III.
5.7-23	Transportation	Mitigation	The proposed signalized traffic signal on Aurora Street at Site Access 1 is located approximately 325 feet from the existing traffic signal at the intersection of S Aurora Street and Hillview Place. Given the close proximity of the proposed traffic signal spacing, it will be necessary to coordinate the traffic signals in order to prevent unacceptable queuing and delay between the intersections. Detailed analysis must be provided proving that adequate progression can be provided with this minimal spacing. Additionally, the existing controller at the Hillview Place/S Aurora Street intersection is likely not capable of such coordination and would probably need to be replaced by the applicant along with any related infrastructure in order to accomplish coordination of the two traffic signals.	23	No Summary.	21	21H	Y	Y	5.7	The mitigated conditions at the proposed Site Access 1 driveway are coded with a coordinated signal system with the nearby S Aurora Street/Hillview Place signalized intersection. The Project Sponsor will be required to provide the proposed mitigation. The Project Sponsor will also be required to perform all necessary upgrades to the traffic signal at S Aurora Street/Hillview Place to allow for coordination between the subject traffic signal and the proposed signal at Driveway I. A detailed analysis of this condition is included in Appendix I of the DGEIS.

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5.7-24	Transportation	Mitigation	The TDM program described in the DGEIS is comprehensive and should be implemented. However, the TDM section needs to include a commitment to fund staff capacity to manage its implementation. TDM programs can be very effective, but they are time intensive and need dedicated mobility management staff. Without dedicated staff the programs will not be implemented.	24	The TDM section of the report describes many strategies that could be used at the site but does not provide a plan to ensure implementation. A more structured plan is needed to justify trip reductions.	13	13B	Y	Y	5.7	<p>The Project Sponsor proposes the following TDM strategies for short-term, Phase 1 implementation as the early development of the Project advances:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Market-priced parking <input type="checkbox"/> Preferential parking for ridesharing services <input type="checkbox"/> Bicycle parking facilities <input type="checkbox"/> Subsidized transit passes <input type="checkbox"/> Connections to transit stops (i.e. construct sidewalks to existing stop at Hillview Place) <input type="checkbox"/> Dedicated shuttle service / rideshare participation (i.e. Zipcar) <input type="checkbox"/> Transportation Alternatives Information <input type="checkbox"/> Coordination with Smart Trips Ithaca <input type="checkbox"/> Connected and improved pedestrian network on and adjacent the Site (i.e., improvements to sidewalks within Sidewalk Improvement District #4) <input type="checkbox"/> Pedestrian oriented design within the Site <input type="checkbox"/> Bicycle network facilities within the Site and connections to nearby Gateway Trail <input type="checkbox"/> Follow CPTED principles in all design <input type="checkbox"/> Coordination with Ithaca College and South Hill Business Park <p>As the Site continues to be built-out, as discussed in Response #19 above, regular traffic updates will be prepared pursuant to the MMI Plan and these traffic updates will incorporate a transportation modal survey to better understand the effectiveness of the TDM strategies. The TDM strategy evaluation will include discussion of new or developing TDM strategies for consideration. Existing research of TDM strategies by the Project Team are presented in the DGEIS updates (see FGEIS Appendix F).</p>
5.7-24	Transportation	Mitigation	2.7.5 Transportation Network This section describes projected transportation network improvements that different phases of the project will require. Who will be responsible for those improvements?	24	The TDM section of the report describes many strategies that could be used at the site but does not provide a plan to ensure implementation. A more structured plan is needed to justify trip reductions.	18	18V	Y	Y	5.7	See comment response 13B.
5.7-25	Transportation	Mitigation	Our preferred mitigation is installing a signal and left/right turn lanes at the Coddington Rd./proposed driveway before any site work begins. Traffic/accident patterns in this location cause some concern for us not mitigating before Phase I. However, we are also aware that the expense of full mitigation at the initial project startup can hinder development. For this reason, we are requesting that you supply a table or a list which would clearly state at what level of traffic volume per intersection mitigation would be needed. In this case, we would require an update on traffic counts at a specified interval to verify the traffic patterns to require mitigation should this be the approved method to move forward. Basically, we will be requiring a sensitivity analysis so we can determine when to implement all appropriate mitigations for the entire project.	25	NYSDOT's preferred mitigation is installing a signal and left/right turn lanes at the Coddington Road/proposed driveway before any site work begins. Traffic/accident patterns in this location cause some concern for us not mitigating before Phase 1. However, NYSDOT is also aware that the expense of full mitigation at the initial project startup can hinder development. For this reason, NYSDOT is requesting that you supply a table or a list which would clearly state at what level of traffic volume per intersection mitigation would be needed. In this case, NYSDOT would require an update on traffic counts at a specified interval to verify the traffic patterns to require mitigation should this be the approved method to move forward. Basically, NYSDOT will be requiring a sensitivity analysis so that they can determine when to implement all appropriate mitigations for the entire project.	22	22C	Y	Y	5.7	The following table notes at approximately what point in future traffic generation from the proposed CWD will trigger the need for mitigation assigned to the noted intersections. (See attached Table). The need for additional mitigation at Route 96B/Coddington Road/Proposed Driveway IV, aside from the left-turn lanes along Route 96B will be reviewed at Site Plan approval of projects beyond Phase 1.
5.7-26	Transportation	Mitigation	The following shall be the Phase I mitigation requirements: a) Changing the four-lane section of NY 968 south from the city/town line to past Bella Vista Dr. by reconfiguring the two southbound lanes to one thru lane and incorporating left turn lanes for both directions at intersections, and hatching where appropriate.	26	NYSDOT will require the following Phase 1 mitigation relative to Route 96B a) Changing the four-lane section of NY 96B south from the city/town line to past Bella Vista Dr. by reconfiguring the two southbound lanes to one thru lane and incorporating left turn lanes for both directions at intersections, and hatching where appropriate.	22	22D	Y	Y	5.7	These comments are acknowledged. The Project Sponsor will seek to partner with the Town of Ithaca, Ithaca College, the South Hill Business Park, and others, as applicable, to implement the noted reconfiguring project.
5.7-26	Transportation	Mitigation	The following shall be the Phase I mitigation requirements: b) Sidewalk will be required along the frontage of the site on the western side of Route 968, from the city/town line to the Coddington Rd. intersection.	26	b) Sidewalk will be required along the frontage of the site on the western side of Route 96B, from the city/town line to the	22	22E	Y	Y	5.7	These comments are acknowledged. The Project Sponsor will seek to partner with the Town of Ithaca, Ithaca College, the South Hill Business Park, and others, as applicable, to implement the noted reconfiguring project.

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5.7-26	Transportation	Mitigation	The following shall be the Phase I mitigation requirements: c) The proposed driveway, immediately south of city/town line, will be a one-way, ingress only; no traffic will be allowed to exit onto Route 968 at this location.	26	Coddington Rd. intersection. c) The proposed driveway, immediately south of city/town line, will be a one-way ingress only; no traffic will be allowed to exit onto Route 968 at this location.	22	22F	Y	Y	5.7	These comments are acknowledged. The Project Sponsor will seek to partner with the Town of Ithaca, Ithaca College, the South Hill Business Park, and others, as applicable, to implement the noted reconfiguring project.
5.7-27	Transportation	Mitigation	Signal timing adjustment will not be considered as an option for a form of mitigation during this phase (Phase 1) of the project. Should larger traffic volumes than expected result from Phase I construction, it may be necessary to look at utilizing the signals to help, but will not be the main form of mitigation. It should also be noted we found numerous errors in the TIS for the modeled signals, but for Phase I we will not require re-submitting a revised TIS. We will work with the developer on the next submittal to correct any errors.	27	NYSDOT will not consider signal timing adjustment as an option for or form of mitigation during Phase 1 of the project. Should larger traffic volumes than expected result from Phase 1 construction, it may be necessary to look at utilizing the signal to help, but will not be the main form of mitigation. It should also be noted NYSDOT found numerous errors in the TIS for the modeled signals, but for Phase 1 they will not require resubmitting a revised TIS. NYSDOT will work with the developer on the next submittal to correct any errors.	22	22G	Y	Y	5.7	These comments are acknowledged. These changes will be incorporated in future analyses.
5.7-29	Transportation	Mitigation	We will require a revised TIS for each phase of the project where modifications and/or additional mitigation is proposed in the NYSDOT R.O.W.	29	NYSDOT will require a revised TIS for each phase of the project where modifications and/or additional mitigation is proposed in the NYSDOT R.O.W.	22	22I	Y	Y	5.7	The comment is acknowledged.
5.7-30	Transportation	Mitigation	Currently, a cross-property connection with the business park immediately to the south of CWD is not shown. We would support property owners should they desire to pursue the connection of properties, since this business park has a signalized access to Route 968.	30	No Summary.	22	22J	Y	Y	5.7	This comment is acknowledged. The Project Sponsor and Lead Agency agree to pursue this during Site Plan Review.
5.7-31	Transportation	Mitigation	I want to acknowledge agreement with the NYSDOT comment from their February 10, 2017 memorandum stating concerns about sight distance for northbound vehicles (especially trucks) approaching stopped vehicles waiting to turn left into Site Access 1. The applicant must investigate sight distance for this potential conflict for review to determine if left-turns should be permitted at this location. Additionally, no northbound left-turn lane is proposed at Site Access 2, though Phase 1 traffic projections show a turn lane being warranted. Further justification for why a left-turn lane is not proposed must be provided or left-turn ingress movement might have to be restricted at this location. Considering the potential northbound sight distance limitations at Site Access 1, it is possible that Site Access 2 might be a better candidate for signalization and installation of a left-turn lane, in which case Site Access 1 might better function as a right-in/right-out only driveway.	31	No Summary.	21	21AN	Y	Y	5.7	The comment is acknowledged. See Response to Comment 23A.
5.7-31	Transportation	Mitigation	One thing we had mentioned in the meeting and forgot to include in our TIS response was restricting the number of access points to NY-96B. The driveway between Coddington Road and the southernmost access will not be allowed; this is the access proposed near building N18. This wasn't proposed until a later phase anyways, but we wanted to be clarify our initial standpoint from the meeting.	31	The driveway between Coddington Road and the southernmost access will not be allowed by NYSDOT; this is the access proposed near building N18.	23	23A	Y	Y	5.7	This comment is acknowledged. The Conceptual Site Layout Plan has been revised. See FGEIS Figure 2.3-2.

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5.7-32	Transportation	Mitigation	Additionally, we have concerns with potential sight distance at the northern-most access drive, northbound on Route 968, when crossing from the town to the city-owned portion of Route 968. Our concern is with regard to the significant downhill grade, which continually increases when traveling north into the city. Large vehicles, specifically trucks, will have a difficult time slowing down for left-turning vehicles waiting to turn into the site. For this reason, we strongly encourage the consideration of a northbound left-turn lane at this intersection.	32	Additionally, NYSDOT has concerns with potential sight distance at the northern-most access drive, northbound on Route 96B, when crossing from the town to the city-owned portion of Route 96B. Their concern is with regard to the significant downhill grade, which continually increases when traveling north into the city. Large vehicles, specifically trucks, will have a difficult time slowing down for left-turning vehicles waiting to turn left into the site. For this reason, NYSDOT strongly encourages the consideration of a northbound left-turn lane at this intersection.	22	22K	Y	Y	5.7	The Project Sponsor recognizes that the northernmost driveway (Driveway 1) has potential sight and horizontal curve characteristics that might make Site Access 2 a better candidate for signalization. Further analysis is needed and will be provided with Phase 1 application. Regardless of whether Site Access 1 or 2 is signalized, interconnect and coordination will be required with the Hillview Place/Aurora Street intersection. Per Comment 22, this will require replacement of the existing traffic signal equipment at the Hillview Place/Aurora Street intersection per Comment 22. It is acknowledged that left-turn lane warrants are met for Site Accesses 1 and 2 per Phase 1 projections. The Project Sponsor acknowledges that left-turn lane construction or restriction will be required for southbound vehicles entering the site at Site Accesses 1 and 2.
5.7-33	Transportation	Transit	Please provide documentation of conversations with TCAT regarding plans for transit accommodation on and near the site.	33	No Summary.	21	21AN	Y	Y	5.7	TCAT is a vital Interested Agency in the GEIS process. The Project Sponsor's traffic consultant made initial verbal contact with TCAT in August 2014. There was an additional meeting between Project Sponsor's consultant team and TCAT on December 18, 2014. The Project Sponsor's traffic consultant recently had a conversation with TCAT on July 14, 2016. Documentation of that conversation is provided in Appendix F of the FGEIS. TCAT will continually be an Interested Agency during the Site Plan Review of each Phase. As of July 14, 2016, TCAT (Matt Yarrow) stated that Route 65 is not ideal for the Project as it is a commuter-based Route. Route 11 is best situated to service the Site once critical demand is met; this demand will be closely monitored through continued coordination between Site employers, Site residents, the Project Sponsor, City Staff and TCAT. An additional Route may be necessary to meet future demand and will be considered as part of the Monitor and Mitigation Implementation Plan.
5.7-33	Transportation	Transit	Transit: The proposal seems to require residents to leave the new neighborhood and cross 96B in order to ride the bus. While it is probably not feasible to change existing bus routes to travel through this new neighborhood, establishing a shuttle to conveniently connect residents and employees from several locations within the new neighborhood to downtown and Ithaca College should be considered. This shuttle could be operated by TCAT or independently. This approach has been incorporated as part of the Collegetown Crossing development and should be explored as part of Chainworks; as well.	33	Same as 21AN.	17	17H	Y	Y	5.7	See Response to Comment 21AN.
5.7-33	Transportation	Transit	5.7.1.5 Transit While "existing demands for transit in the South Hill area are met", the DGEIS doesn't go into much detail about future needs. Can current service frequencies and capacity handle the anticipated need? How will TCAT handle future demands for transit?	33	Same as 21AN.	18	18AJ	Y	Y	5.7	See Response to Comment 21AN.
5.7-34	Transportation	Pedestrian and Bicycle Facilities	It is unclear why the site plan does not show proposed sidewalk along the S Aurora Street frontage near Residential Area N18.	34	No Summary.	21	21K	Y	Y	5.7	The Project Sponsor has revised the Conceptual Site Layout Plan to include sidewalks along all Sponsor controlled properties (see FGEIS Figure 2.3-2). Sidewalk design and details will be addressed during individual Site Plan Review of each Phase.
5.7-34	Transportation	Mitigation	5.7 Transportation/Circulation The DGEIS directs most of its attention towards motor vehicles. For example, the mitigation implementation scenario for intersections on page 5-131 focuses entirely on motor vehicles – not the needs of pedestrians or cyclists. Other forms of transportation – walking, cycling, and public transit – should not be an afterthought in the review or design of Chain Works, especially considering its urban setting, and its aspirations of sustainability and walkability. Mitigation should place a greater priority on how to better move people, not just cars and trucks. Are sidewalks proposed for the portion of the project along Aurora Street/NYS Route 96B?	34	Same as 21K.	18	18AI	Y	Y	5.7	Same as 21K.

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5.7-34	Transportation	Pedestrian and Bicycle Facilities	5.7.3.2 Adjacent Roadway Network The Transportation Demand Management (TDM) strategy for "Relationship with Ithaca College" reads, in part, "The feasibility of recommendations for pedestrian sidewalks and pedestrian connections along NYS Route 96B as it related to the on-going Route 96B Pedestrian Corridor Study remain to be seen." This seems to reflect some uncertainty about the need for a pedestrian connection between Chain Works and Ithaca College. Considering the scale of Chain Works, a safe, uninterrupted, all-season pedestrian connection to Ithaca College will be a necessity, not something that "remains to be seen". The intent of the Route 96B Pedestrian Corridor Study was to assess current pedestrian needs under existing conditions. The preliminary draft report does, however, acknowledge future development potential within the corridor and includes the statement that "...as the Chain Works District develops and becomes more of a destination, sidewalks should be constructed as part of that development..."	34	Same as 21K.	18	18AO	Y	Y	5.7	Same as 21K.
5.7-35	Transportation	Mitigation	It appears that the orientation of vehicles accessing Lower Morse Place from the parking lot south of Building 18 could create sight distance limitations based on its acute intersection angle. The intersection of Lower Morse Place with South Cayuga Street presents similar limitations. Sight distance should be investigated at these locations.	35	No Summary.	21	21T	Y	Y	5.7	The final design and geometry of the internal roadway network, including providing turn movement analysis, will be addressed during individual Site Plan Review of each Phase. Specific to the comment, the Lead Agency understands that the Lower Morse Place roadway will have a speed limit of 20 mph as well as be one way which will improve site distance.
5.7-36	Transportation	Pedestrian and Bicycle Facilities	The site plan shows significant gaps in the internal sidewalk network in the vicinity of Scout Path and the two parking areas nearby. Please provide analysis of how pedestrian access will be accommodated.	36	No Summary.	21	21AL	Y	Y	5.7	Acknowledged. The Project Sponsor has revised the Conceptual Site Layout Plan to add these connections (see FGEIS Figure 2.3-2). The final design of the internal pedestrian network will be addressed during the individual Site Plan Review of each Phase.
5.7-37	Transportation	Transit	It is unclear from the site plan where the proposed bus stop locations will be provided and whether these bus accommodations at these sites will be accessible the ADA standards. Further information should be provided, including timeline for implementation.	37	No Summary.	21	21N	Y	Y	5.7	The Conceptual Site Layout Plan identifies two potential bus stop locations. The final locations will be addressed during individual Site Plan Review of each Phase
5.7-38	Transportation	Parking	Some areas of the site plan are labeled with the total number of parking spaces. Please label all parking areas with total spaces per area for ease of review and provide analysis to verify that sufficient parking will exist for all land uses without need for long walking distances.	38	No Summary.	21	21M	Y	Y	2.7	Acknowledged. The Project Sponsor has revised the Conceptual Site Layout Plan to label all surface parking areas as depicted. The final design of the parking areas will be addressed during individual Site Plan Review of each Phase..
5.7-39	Transportation	Phase 1 Site Plan	A site plan should be provided illustrating what portion of the internal site circulation path and site access points will be developed with Phase 1 of development.	39	No Summary.	21	21X	Y	Y	2.7	The internal site circulation and roadway network is included with the Phase 1 Site Plan Drawings (see Appendix B-2 of the DGEIS).
5.7-40	Transportation	Trip Distribution	Turning movement analysis should be provided to demonstrate that the roadway area south of Residential Area N38 is sufficient for turnaround of vehicles.	40	No Summary.	21	21P	Y	Y	5.7	The final design and geometry of the internal roadway network, including providing turn movement analysis, will be addressed during individual Site Plan Review of each Phase.
5.7-41	Transportation	Mitigation	It is unclear where stop signs will be provided in the grid of streets in the vicinity of Housing areas N27 – N38.	41	No Summary.	21	21O	Y	Y	5.7	Internal traffic controls will be addressed during individual Site Plan Review of each Phase.
5.7-42	Transportation	Mitigation	Stop signs are not shown on the site plan for egress from Site Access 3.	42	No Summary.	21	21Q	Y	Y	5.7	Acknowledged. The Project Sponsor has revised he Conceptual Site Layout Plan to show proposed stop sign locations (see FGEIS Figure 2.3-2). The final location of Internal traffic controls will be addressed during individual Site Plan Review of each phase of Project development.
5.7-43	Transportation	Mitigation	The stop sign shown near Residential Area N4 appears to be misplaced. It was probably intended to be located at the nearby four-leg intersection with only one stop sign shown.	43	No Summary.	21	21R	Y	Y	5.7	As noted above, the final location of internal traffic controls will be addressed during individual Site Plan Review of each phase of Project development.
5.7-44	Transportation	Mitigation	The driveway access to Residential Area N2 appears as if vehicles will need to pull in and out directly into an internal intersection. Clarification should be provided on the access scheme.	44	No Summary.	21	21S	Y	Y	5.7	The final design and geometry of the internal roadway network, including providing turn movement analysis, will be addressed during individual Site Plan Review of each Phase
5.7-45	Transportation	Trip Distribution	The number of PM peak egress trips shown in Figure 5.7-22 appears to show 124 egress vehicles, while the trip generation table shows 143 egress trips.	45	No Summary.	21	21AA	Y	Y	5.7	Acknowledged. The correct trips are shown on Figure 5.7-22. The revised trip generation table to reflect the correction is included in the DGEIS updates (see FGEIS Appendix G).
5.7-46	Transportation	Trip Distribution	Eastbound Clinton Street traffic left-turn and through volumes approaching Turner Place on Figure 5.7-22 appear to be switched. Please verify that the analysis reflects correct volumes.	46	No Summary.	21	21AC	Y	Y	5.7	Acknowledged. The corresponding figure has been revised and is presented in the DGEIS updates (see FGEIS Appendix G).

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5.7-47	Transportation	Analysis Data	Phase 1 and Phase 2 PM Peak development scenarios shown in Figures 5.7-28 and 5.7-30 show improvement of the eastbound Columbia Street approach to S Aurora Street relative to background condition. Please verify that this reflects the analysis results correctly.	47	No Summary.	21	21AD	Y	Y	5.7	Acknowledged. The corresponding figure has been revised and is presented in the DGEIS updates (see FGEIS Appendix G).
5.7-48	Transportation	Trip Distribution	There appear to be discrepancies between some vehicles leaving and entering adjacent intersections on Figure 5.7-23. Additionally PM trips do not appear to match trip generation shown in the traffic study trip generation tables	48	No Summary.	21	21AE	Y	Y	5.7	Acknowledged. The corresponding figures have been revised and are presented in the DGEIS updates (see FGEIS Appendix G).
5.7-49	Transportation	Trip Distribution	Figure 2.7-24 shows some trip distribution as percentages and some as actual trips.	49	No Summary.	21	21AF	Y	Y	5.7	Acknowledged. The corresponding figures have been revised and are presented in the DGEIS updates (see FGEIS Appendix G).
5.7-50	Transportation	Existing Conditions	No capacity analysis has been provided for the existing roundabout at the Spencer Street/Albany Street/Park Street intersection.	50	No Summary.	21	21AJ	Y	Y	5.7	Refer to response to Comment ID 2D.
5.7-51	Transportation	Study Scope	Scoping document 5.7.1 (p. 32): I have not had the time available to thoroughly check the traffic data. I note, however, that the "help document" just provided by the applicant indicates (p. 32) that several intersections on the list have apparently not been studied. The first of these, "State/Tuning Fork" has, I think, been addressed as "State/Seneca Way," but the last three (Stone Quarry/Spencer, S. Meadow Ext./Spencer, and S. Meadow Ext./Elmira) appear from the list on pp. 5-67 and 5-68 to be missing from the DGEIS.	51	Scoping document included three additional intersections (Stone Quarry/Spencer, S. Meadow Ext./Spencer, and S. Meadow Ext./Elmira) that were not included in the DGEIS.	2	2D	Y	Y	5.7	As noted in the DGEIS, Page 5-68, "Reviewing agencies, such as the New York State Department of Transportation (NYSDOT), use a guideline that if a proposed project is projected to add 100 vehicles per hour (vph), then it should be studied for potential traffic impacts. Given that the Proposed Action is anticipated to generation 68 vph or fewer at the S. Meadow Ext./Elmira Road intersection, and negligible traffic volumes at the S. Meadow Ext./Spencer Road and Stone Quarry Road/Spencer Road intersections during any of the peak hours, the adjacent intersections and surrounding roadway network are unlikely to experience any significant adverse traffic impacts; thus, no further study is required. This is supported by the City of Ithaca and Town of Ithaca in review and acceptance of the September 2014 Phase 1 Scoping/Trip Generation/Trip Distribution Report.
5.7-51	Transportation	Existing Conditions	According to the City's Comprehensive Plan Draft Influences Report, South Aurora Street/Danby Road typically sees 14,000 vehicles per day and is a main artery into and out of the City. ¹ As Figure 5.7-42 shows, 26% of incoming morning peak traffic turns west onto King Road, and presumably a significant portion of that traffic will enter the city through Stone Quarry Road and Spencer Road. Likewise, fully 59% of peak afternoon traffic exits the city on King Road and turns south onto Route 86B. Given the expected increases in rush hour traffic on Route 86B due to kids crossing the street to go to South Hill Elementary School or Ithaca College, or to go to work, it is expected that travelers entering the city from Route 96B will come to rely on Stone Quarry Road and Spencer Road as direct and non-congested avenues into the city and to shopping on Route 13 south. These intersections should be included in the traffic impact study and analysis	51	Same as 2D.	8	8W	Y	Y	5.7	Refer to response to Comment ID 2D. Additionally, a drive-time assessment was performed using Google Maps during peak and off-peak hours based upon historical data. The assessment, as well as the projected trip distribution for the Site, show that travelling to and from the Site is more conducive using NYS Route 96B to the north of the Site; as opposed to travelling NYS Route 96B to the south and using King Road/Stone Quarry Road.
5.7-51	Transportation	Existing Conditions	The draft also indicates that the traffic will not be an issue from Danby Road, through West King Road down Stone Quarry Road to Spencer Road. I don't agree with that. Being that traffic is a big issue here on the 400 block and especially now with the new Stone Quarry Apts. I watch school age children, disabled persons and families navigating the road with no sidewalk and a blind corner to deal with to catch school buses, walk their pets or catching city bus and or just walking from shopping or biking down to Buttermilk Falls or wherever people go. The traffic will increase from up above to down the hill where there are no traffic lights only a single stop sign at the bottom of the hill. I believe the traffic will continue to grow and be more of a problem in the future.	51	The Commenter disagrees with the DGEIS finding that the traffic will not be an issue from Danby Road, through West King Road down Stone Quarry Road to Spencer Road.	16	16E	Y	Y	5.7	The comment is acknowledged. Refer to response to Comment ID 2D. Based on the low projected trips to travel down King Road, the impact from the Proposed Action is very little.
5.7-52	Transportation	Existing Conditions	The DGEIS also does not include King Street and Stone Quarry in terms of its parking, traffic impacts and for the volume of individuals who are coming down from out of town, I do believe that it will impact those individuals who will just bypass Aurora and go down Stone Quarry to get into town and that should be included in the traffic analysis. I requested it in the scoping document. I was told that it would be included in the scope so I was surprised that it indeed was not included.	52	King Street and Stone Quarry Road intersection should be included in the TIS.	8	8E	Y	Y	5.7	The comment is acknowledged. Refer to response to Comment ID 2D. Based on the low projected trips to travel down King Road, the impact from the Proposed Action is very little.

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5.7-53	Transportation	Existing Conditions	Chapter 4.8 (sic) Impact on Transportation and Circulation a. Analyze existing intersections during peak hour and including the following: Please add the following intersections into this analysis (pg 26): ~ Stone Quarry/Spencer Road ~S. Meadow St. Extension/Spencer Road ~S. Meadow St. Extension/Elmira Road/Meadow St.	53	No Summary.	8	8T	Y	Y	5.7	Refer to response to Comment ID 2D.
5.7-54	Transportation	Existing Conditions	ii) The following intersections should be included in the traffic study: a)West King Road/Stone Quarry Road, b) Stone Quarry Road/Spencer Road, c)Spencer Road/South Meadow Street Extension, and d)Old Elmira Road/South Meadow Street Extension/South Meadow Street	54	No Summary.	8	8V	Y	Y	5.7	Refer to response to Comment ID 2D.
5.7-55	Transportation	Trip Generation	5.7.2.2 Project Trip Generation Table 5.7-4 (Project Generated Trips) needs more explanation. What specific ITE land use category was the basis for the trip generation estimate for a certain land use? What is the pre-adjustment average trip generation rate for the land use categories? Do the "AM Peak" and "PM Peak" projections represent just one peak hour, or the two-hour peak ranges (7:00 AM - 9:00 AM, 4:00 PM - 6:00 PM) the DGEIS uses elsewhere? Also, limiting data and projections to peak hours doesn't give a full picture of impacts throughout the day, including vehicle trips during off-peak hours (about 60% of the total).	55	What specific ITE land use category was the basis for the trip generation estimate for a certain land use? What is the pre-adjustment average trip generation rate for the land use categories? Do the "AM Peak" and "PM Peak" projections represent just one peak hour, or the two-hour peak ranges (7:00 AM - 9:00 AM, 4:00 PM - 6:00 PM) the DGEIS uses elsewhere? Also, limiting data and projections to peak hours doesn't give a full picture of impacts throughout the day, including vehicle trips during off-peak hours (about 60% of the total). If applicable, describe any adjustment for purpose-built student housing (lower vehicle ownership, shuttle service, etc.).	18	18AK	Y	Y	5.7	Refer to the Traffic Impact Study (TIS) in Appendix I1 for a breakdown of the ITE land use categories used for trip generation purposes. The "AM Peak" and "PM Peak" projections represent trip generation for a one-hour peak during the two peak periods analyzed. Typically, traffic impact studies analyze traffic during the peak hours of operation on adjacent roadways and project-related travel. These times reflect the greatest potential impact of critical movements. Although daily traffic is considered, peak traffic is more appropriately used if/when traffic control measure changes are needed in the study area. Purpose-built student housing was not explicitly analyzed as part of the trip generation estimates since that is not part of the site program. All residential components were estimated using typical apartment rates within a denser setting offering a more conservative approach. The inclusion of student housing and available alternative modes of transportation can reduce overall trip generation estimate.
5.7-55	Transportation	Trip Generation	*(The following section was presented as a table in the actual letter. Each set of [] contains the info as it would be read across the rows. The following is an example of how the info is laid out in the brackets [] in the order of the column titles: [Phase, Land Use, AM PEAK (7-9 AM), (PM PEAK 4-6 AM), DAY (ADT)]) here is the comment-> Recreating the table (below) using default variables in the ITE Trip Generation Manual (9th edition) for trip generation rates (per apartment, or 1000 ft² GFA for non-residential uses), and two-hour AM and PM peak periods (peak hours of adjacent street traffic), the results are much different. Even adjustment for TND or urban mixed use projects does not seem like it would account for the difference. [1, Office (General office 710), 257, 246, 909] [1, Residential (Apartment 220), 82, 99, 532] [1, Industrial (General light industrial 110), 314, 331, 1,189] [1, Subtotal, 653, 676, 2,630] [2, Office (General office 710), 579, 553, 2,047] [2, Residential (Apartment 220), 852, 1,035, 5,553] [2, Retail (Shopping center 820 (most general)), 100, 387, 2,228] [2, Restaurant (Sit-down restaurant 932), 156, 142, 915] [2, Industrial (General light industrial 110), 454, 478, 1,718] [2, Subtotal, 2,141, 2,595, 12,461], [Total, Total project generated trips (ITE), 2,794, 3,271, 15,091] [Total, Chain Works EIS table on page 5-88, 1,124, 1,341, n/a] Please explain the input variables and ITE land use categories for peak hour trip generation in the DGEIS. If applicable, describe any adjustment for purpose-built student housing (lower vehicle ownership, shuttle service, etc.).	55	What specific ITE land use category was the basis for the trip generation estimate for a certain land use? What is the pre-adjustment average trip generation rate for the land use categories? Do the "AM Peak" and "PM Peak" projections represent just one peak hour, or the two-hour peak ranges (7:00 AM - 9:00 AM, 4:00 PM - 6:00 PM) the DGEIS uses elsewhere? Also, limiting data and projections to peak hours doesn't give a full picture of impacts throughout the day, including vehicle trips during off-peak hours (about 60% of the total). If applicable, describe any adjustment for purpose-built student housing (lower vehicle ownership, shuttle service, etc.).	18	18AL	Y	Y	5.7	Same as 18AK.
5.7-56	Transportation	Trip Generation	The Appendix briefly touches on the long-term impacts of a "no build" alternative, but not the DGEIS. While trip generation numbers for Chain Works seem daunting, its overall impact should be lower than the alternative -- conventional suburban development that would otherwise satisfy market demand.	56	No Summary.	18	18AM	Y	Y	5.7	The comment is acknowledged.

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5.7-57	Transportation	Trip Generation	5.7.2.3 Trip Reduction Adjustments The methodology for trip generation reduction on pages 5-89 through 5-91 is reasonable, and the adjustment seems conservative.	57	No Summary.	18	18AN	Y	Y	5.7	The comment is acknowledged.
5.7-58	Transportation	Trip Generation	2.7.7 Anticipated Project Population The office, retail and industrial areas in Table 2.7-3 (Anticipated Employee Population) do not match those of the traffic projections in Table 5.7-4 (Projected Generated Trips). Which information is correct?	58	Explain the discrepancy between trip generation rates and project population estimates.	18	18W	Y	Y	5.7	The trip generation rates utilized for the TIS is based on size of the projected land use except for the residential component which is based on number of units.
5.7-59	Transportation	Complete Streets	Complete streets: Complete Streets consider the needs of all users, including pedestrians, bicyclists, public transportation riders, motorists and citizens of all ages and abilities, including children, the elderly and the disabled. The internal street network of the project should be required to provide sidewalks on both sides of all streets, high-quality pedestrian crossings, bike lanes, and narrow streets to help calm traffic and promote an urban neighborhood experience.	59	CWD proposes to include Complete Streets that should consider the needs of all users, including pedestrians, bicyclists, public transportation riders, motorists and citizens of all ages/abilities.	17	17G	Y	Y	5.7	Acknowledged. This is a key component of developing the Project in accordance with LEED ND principles.
5.7-60	Transportation	Pedestrian and Bicycle Facilities	6.7 (page 48) says the TIS will estimate the add'l demand for transit. I don't see a demand analysis included. They seem to state that there should be a motor vehicle trip reduction of 4% based on transit, but that's not a demand analysis. That same paragraph states there will be a detailed on-site multi-modal transportation plan including detailed locations and descriptions of sidewalks, bicycle lanes, trails and pedestrian connections to both IC and downtown. I don't see a detailed plan, just some more generalized notes. Maybe this is still forthcoming because it's in the mitigation measures section, but it also seems to be something that was to be included in the TIS.	60	No Summary.	4	4B	Y	Y	5.7	The Conceptual Site Layout Plan includes detailed locations for sidewalks, trails and and pedestrian connections. Additional specifics on the geometry for lanes and sidewalks are included in the Design Guidelines under the Thoroughfare Assemblies section.
5.7-61	Transportation	Pedestrian and Bicycle Facilities	The Transit and Pedestrian/Bicycle Trip Reduction section states that the transportation study assumes a 7% trip generation credit for active transportation (bicycling and walking). This is ambitious considering the Chain Works project is on a hill and reaching the area from the flats on foot or by bicycle will be a challenge for most users. Chain Works offers a unique configuration of housing and employment that makes it difficult to predict how the existing averages from active transportation use from other parts to the Ithaca Urban area will relate to the project. Except for connecting to Ithaca College, the GEIS does not make any particular proposals to facilitate bike/pedestrian movement to destinations outside the project area other than linking to the City's sidewalk network and linking the Gateway Trail to the South Hill Recreation Way. I suggest that the developers work with City staff to identify preferred bike/pedestrian routes to connect the Chain Works project to outside destinations: the Commons, TCAT's Green St. bus facility, Cornell University, west end shopping area, etc. These routes could be considered for enhancements that will facilitate the effective use of active transportation to access the Chain Works project. I will gladly meet with project or City representatives to explore potential enhancements to better connect the project area to the rest of the urban area via active transportation.	61	No Summary.	13	13A	Y	Y	5.7	The comment is addressed via a supplemental narrative to the DGEIS.

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5.7-62	Transportation	Mitigation	The On-Site Multimodal Transportation Plan calls for the use of sharrows and signage on roads too narrow to accommodate bike lanes. Sharrows and signs by themselves do not provide adequate bicycle facilities, nor do they indicate a street is bike friendly. Assuming the installation of a dedicated bicycle right-of-way - i.e. some form of bicycle lane - is not possible, the use of sharrows and signs must be accompanied by installation in low traffic areas and/or by significant traffic calming in order to reduce the speed differential between cars and bicycles.	62	The use of sharrows and signs must be accompanied by installation in low traffic areas and/or by significant traffic calming in order to reduce the speed differential between cars and bicycles.	13	13C	Y	Y	5.7	The comment is acknowledged. All relevant and required signage and/or markings will be used when designating a particular roadway, a recognized bicycle facility.
5.7-63	Transportation	Mitigation	If level of service E conditions are documented for any intersections approach to be monitored, the applicant will be responsible for mitigation of the condition to LOS D or better before additional development can occur. This criteria is consistent with NYSDOT's standards for operation, so all study intersections will be subject to the same evaluation criteria. If no physical mitigation is identified due to technical infeasibility, the applicant will be required to document a reduction in site trips to the intersection through TDM or other measures allowing for LOS D or better operations for all movements before further development can occur. Regarding the Turner Place and Cayuga Street corridors, the applicant will be responsible for ensuring that acceptable traffic operations are maintained along these midblock sections and that traffic volumes do not cause a change in the character of these roadways	63	Same.	21	21AK	Y	Y	5.7	It is our understanding that existing conditions, such as an LOS of E, are not the responsibility of the Project Sponsor and that mitigation by the Project Sponsor is commensurate of our Project Impacts. Obviously, the Project Sponsor will be required to obtain permits through NYSDOT and will comply with their standards of mitigation.
5.7-64	Transportation	Mitigation	I also want to acknowledge that the Phase 1 site access scheme and internal transportation network cannot be identified completely or agreed on until the specific locations associated with Phase 1 are finalized. The extent of the initial phase of development and its location within the site will dictate what access points need to be developed and whether they should be signalized. This will involve collaboration between the City and State to determine.	64	No Summary.	21	21AM	Y	Y	5.7	The comment is acknowledged.
	Transportation	Existing Conditions	Chapter 5.7.1.1 (page 5-67) Existing Transportation Facilities. dGEIS Statement: The study locations consist of the following 30 existing intersections. Comment: i) The study should clearly separate Spencer Road and Spencer Street. The dGEIS currently mis-identifies parts of Spencer Road as Spencer Street, as seen in intersection 14: Spencer Street/Albany Street/Park Street/Elmira Road Roundabout. From the roundabout, Spencer Road spurs south and Spencer Street spurs north.		No Summary.	8	8U	Y	Y	5.7	The associated figures in the DGEIS have been revised.
5.8-1	Utilities	Public Water	5.8.1.1 Water Supply In figure 5.8-1, the existing water main that crosses the site from east to west to the railroad bed is 12 inches in diameter, not 8 inches as shown in the figure.	1	No Summary.	18	18AP	Y	Y	5.8	Figure 5.8-1 in the DGEIS has been revised accordingly.
5.8-2	Utilities	Public Water	All water mains should be looped and contain as few dead ends in the system as possible.	2	No Summary.	18	18AQ	Y	Y	5.8	Noted. The final design of all utilities will be addressed during Site Plan review.
5.8-3	Utilities	Sanitary Sewer	During the 1980's, a faulty sanitary line that runs parallel to Rt. 96B would leak raw sewage into the stream whenever there was a thunder storm. We are concerned that this same sanitary line served as a means of conducting contamination from the old NCR site. It's hard to believe that NCR was any more responsible with its use of hazardous materials than subsequent industrial owners of the proposed CWD.	3	The sanitary sewer main that parallels NYS Route 96B leaked during the 1980s. There is a concern that this caused contamination.	14	14B	Y	Y	5.8	Acknowledged. See Public Health section for discussion.
5.8-4	Utilities	Sanitary Sewer	5.8.1.2 Sanitary Sewers Housing in area CW-2 is downhill from the existing sanitary sewer service. The sanitary sewer for this housing area would need to be pumped uphill to the existing gravity sewer. If the proposal involves multiple owners (e.g. HOA), then the developer will need to set up a Sewage Works Corporation for maintenance of these facilities.	4	No Summary.	18	18AR	Y	Y	5.8	Noted. The final design of all utilities will be addressed during Site Plan review.
5.8-5	Utilities	Sustainable Design	You have a goal of 70% fossil fuel reduction. What is this a reduction from? How will it be monitored?	5	No Summary.	1	1X	Y	Y	5.8	Architecture 2030 states that all new buildings, developments and major renovations shall be designed to meet a fossil fuel, GHG-emitting, energy consumption performance standard of 70% below the regional (or country) average/median for that building type. The 70% fossil fuel reduction referenced in the DGEIS is compared to conventional buildings of the same quantity and type at this time. This can be achieved in many ways including more reliance of on/off-site renewable energy, higher efficiency MEP systems and/or building envelope improvements. The DGEIS and the Conceptual Site Layout Plan is conducive to allowing the integration of renewable energy systems as outlined in the Architecture 2030 Challenge with a goal of a 70% reduction of fossil fuel usage as stated in Section 2.6.3. This strategy exceeds the NYS Energy Conservation Construction Code and the goals set forth in the DGEIS are in alignment with the Tompkins County Energy Roadmap goals.

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5.8-6	Utilities	Sustainable Design	Energy: The Tompkins County Energy Roadmap (http://www.tompkinscountyny.gov/planning/energy-climate) states that in order to achieve the community's stated GHG emissions goal of an 80% reduction in emissions from 2008 levels by 2050, it is critical to reduce energy demand in buildings. The Roadmap calls for constructing new buildings that are extremely energy efficient, aiming for a 70% reduction in energy use compared to the national median for comparable buildings, and increasing to net zero carbon emissions between 2030 and 2050. The Roadmap also calls for achieving a 35% reduction in energy use in existing buildings through retrofits and upgrades. This DGEIS should consider mitigation strategies that far exceed NYS Energy Conservation Construction Code standards for insulation and air sealing.	6	The DGEIS should consider mitigation strategies that exceed NYS Energy Conservation Construction Code standards so that the Tompkins County Energy Roadmap goals for 2050 are met.	17	17I	Y	Y	5.8	Same as 5.
5.8-7	Utilities	Sustainable Design	This DGEIS should also consider mitigation strategies to allow more integration of renewable energy systems. As an example, a mitigation strategy could be to take advantage of passive solar gain in building orientation, include south-facing roofs that can host solar PV systems on all buildings, and develop building infrastructure on both new and renovated buildings in such a way as to minimize the roof area occupied by HV AC systems and maximize the capacity to install rooftop solar panels.	7	The DGEIS should also consider mitigation strategies to allow more integration of renewable energy systems.	17	17J	Y	Y	5.8	Same as 5.
5.8-8	Utilities	Stormwater	The document states that the extent and details of the stormwater facilities on site are not completely known or understood. When will we know the extent of the stormwater system and how stormwater can be management be evaluated without this knowledge.	8	No Summary.	1	1AG	Y	Y	5.8	The conceptual stormwater management plan for the entire Project Site is outlined in the DGEIS. Final stormwater management designs and a SWPPP based on the conceptual plan will be addressed during the Site Plan review process.
5.10-1	Visual and Aesthetic Resources	Conceptual Visualizations	Pg 5-214: The document states that the conceptual layout mitigates visual impacts due to careful placement of proposed structures in relationship to the topography. Finer grained visualization showing more information about proposed heights, and sections are needed to understand this relationship.	1	Finer grained visualization showing more information about proposed heights, and sections are needed to understand this relationship between height and topography.	1	1AV-1	Y	Y	5.10	The Proposal calls for a maximum area of 568,300sf of new development in the CW2 Sub Area that can range from one-story up to four-stories in height in the CW2 Sub Area. This maximum area can be achieved by constructing buildings of varying heights. The original referenced visuals are using three-story structures as the basis of achieving the proposed maximum development in this subzone. These visualizations, as well as the site cross-sections, have been revised to add a fourth story along NYS Route 96B as proposed in the PUD/PDZ. The use of the white/light colored structures was determined for ease of review in building massing. Actual building materials/colors will be developed during Site Plan Review.
5.10-2	Visual and Aesthetic Resources	Conceptual Visualizations	Figure 5-10c is remarkable in that the new buildings are at the highest point of the sight and appear to tower over the existing. We need a better understanding of how the new building will relate to the exiting contiguous neighborhoods and to 96B.	2	Figure 5-10c is remarkable in that the new buildings are at the highest point of the site and appear to tower over the existing. More information should be provided.	1	1AV-2	Y	Y	5.10	Same as 1
5.10-2	Visual and Aesthetic Resources	Conceptual Visualizations	5.10 Visual/Aesthetic Resources Overall, the visual analysis is thorough. However, the photos related to the conceptual structures along Aurora Street/Route 96B (pages 5-171, 5-183, 5-190, 5-192), only show three story structures, where the proposal is actually for 4-story structures along the Aurora Street/NYS Route 96B frontage.	3	The visual analysis is thorough. However, the photos related to the conceptual structures along Aurora Street/Route 96B (pages 5-171, 5-183, 5-190, 5-192), only show three story structures.	18	18AU	Y	Y	5.10	Same as 1
5.10-3	Visual and Aesthetic Resources	Conceptual Visualizations	The photos from West Haven Preserve were actually taken from the EcoVillage fields above the preserve (Page 5-168, Figure 5.10-1).	4	No Summary.	18	18AW	Y	Y	5.10	Noted and revised. The West Haven Preserve and the EcoVillage Field are directly adjacent to one another and the EcoVillage Field overlooks the preserve. The view is nearly identical.
5.11-1	Community Services	Educational Facilities	Correspondence with ICSD states that the project will have 50-100 school aged children. The capacity analysis only accounts for 50. Correspondence with ICSD indicated that planning would be necessary to accommodate 50 children in some situations. The document does not address how a potential influx of children would be facilitated/planned with ICSD.	1	Correspondence with ICSD indicated that planning would be necessary to accommodate 50 children in some situations. The DGEIS does not address how a potential influx of children would be facilitated/planned with ICSD.	1	1AW	Y	Y	5.11	The planning necessary to receive the additional school-aged children is the responsibility of ICSD. The purpose of the GEIS is to ensure that the ICSD will not be negatively impacted by CWD. The number of students were estimated by the Project Sponsor based on the anticipated Site Program. Additional State Aid and the related ad valorem associated with the development will provide the financial means for ICSD to implement facility planning, if it is deemed necessary by the District. Coordination with ICSD, an Interested Agency to the Project, is ongoing. Updates on the Site Program will be sent to the ICSD during Site Plan Review of the individual Phases.
5.11-2	Community Services	Educational Facilities	Does the school tax revenue take into account the STAR Rebate?	2	No Summary.	1	1AX	Y	Y	5.11	The Applicant understands that the STAR Rebate provides property tax relief. Residents are eligible for STAR if they own their own house as a primary residence and have a combined income of less than or equal to \$500,000. The Chain Works District DGEIS makes no mention of the STAR Rebate and how it would affect tax revenue. For those that qualify for STAR property tax relief, they would receive a STAR credit in the form of a check, rather than receiving a property tax exemption. The dollar value of the credit will be the same as the property tax exemption. Because the household receives a STAR credit, property tax revenue for the school system should remain the same.

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X-Reference	Comment Category	Comment Subcategory	Comment	Comment Summary No.	Summary of Comment	Commenter ID	Comment ID	Sub.	Rel	Relevant DGEIS	Response to Comment
5.11-3	Community Services	Educational Facilities	(5 Page 5-217; 6 Page 5-218) Chapter 5.11.1.3 (page 5-217) Educational Facilities. dGEIS Statement: South Hill Elementary School currently has 322 students enrolled in Pre-K to 5th grade with approximately 80 teachers and staff. The average class size at South Hill Elementary School is 18 students with a teacher / student ratio of 1:11. South Hill Elementary School's current estimated capacity is 385 students.5 ... Boynton Middle School currently has 555 students enrolled in 6th to 8th grades with approximately 90 teachers and staff. The average class size at Boynton Middle School is 21 students, with a teacher / student ratio of 1:9. Boynton Middle School's current estimated capacity is 600 Students. Ithaca High School currently has 1,362 students enrolled in 9th to 12th grades with approximately 109 teachers. The average class size at Ithaca High School is 21 students with a teacher / student ratio of 1:10. Ithaca High School's current estimated capacity is 1500 students.6 Comment: The addition of 119 elementary school students would be a 37% increase over the current population of SHES and would exceed the school's capacity by 56, having a dramatic effect and likely resulting either in the need to enlarge the school or redistrict student catchment areas. This impact on ICSD should be stated and explored with input from ICSD administrators. To my knowledge no such discussion has yet occurred.	3	The Commenter disagrees with the DGEIS estimate for school age children and provides their own estimate that the CWD will create a demand of 119 elementary school students. Further discussion on existing school population and potential impact based on the Commenter's estimate should be stated and discussed with ICSD.	8	8O	Y	Y	5.11	The comment is acknowledged. See response to Comment 1.
5.11-4	Community Services	Public Safety	It would be helpful to know the cost of full time police officers	4	No Summary.	1	1AY	Y	Y	5.11	According to Officer Jamie Williamson, in 2011, the last year the City of Ithaca and the Ithaca PBA had a contract, the base salary for a police officer at the Ithaca Police Department \$70,000. The benefit package for each police officer costs the City of Ithaca an additional \$49,000 dollars. With those two amount combined, each police officer costs the City of Ithaca about \$119,000. The Ithaca Police Department has 66 sworn officers. According to Undersheriff Brian Robison, the Sheriff's Office has a current contract ending at the end of the year, December 31st, 2016. The salary for a work rate deputy is \$65,000 plus fringe benefits . The Tompkins County Sheriff's Office has 27 full time deputies.
5.12-1	Open Space & Recreation	Recreation	Chapter 4.7 (sic) Impact on Open Space and Recreation a. Description of Gateway Trail and connection to existing and future trail network – Please include potential connections to the trail through the T1 (natural zone). It is often mentioned that this area would contain walking trails, and it is logical that individuals would desire to connect between the T4 developments (pg 18) and the Gateway trail to get to area south such as Stone Quarry and Buttermilk Falls.	1	Please provide trail connections through the CW1 Zone.	8	8S	Y	Y	5.12	Acknowledged. See Revised Conceptual Site Layout Plan that depicts conceptual locations for recreational areas. The actual design of the recreation/public amenity areas will be developed during the Site Plan approval process for the individual Phases.
5.13-1	Construction	Mitigation	There's going to be fugitive dust problems.	1	No Summary.	7	7B	Y	Y	5.13	See Response to 70. Mitigation for construction dust is governed by the required NYSDEC SPDES Permit for General Construction (GP-0-15-002). This includes developing a Full SWPPP for each individual Phase that requires dust control, temporary soil cover, erosion blankets and other standard BMPs. Also, a Monitoring Plan will be developed as required by NYSDEC as part of the RI.
5.13-2	Construction	Mitigation	Where is the cut & fill analysis for Phase 1?	2	No Summary.	1	1AE	Y	Y	5.13	See Figure 5.2-3 in Section 5.2.2 of the DGEIS for the cut & fill analysis for the entire site based on the Conceptual Site Layout Plan. Each Site Plan review package will include a cut & fill analysis as part of the design of each individual Phase and will be reviewed by the applicable Planning Board at that time to ensure no adverse impacts that are not addressed in the GEIS.
5.13-3	Construction	Mitigation	Blasting may be required in certain areas. Therefore it would make sense to outline the environmental impacts and mitigations to prevent reopening on the env review later.	3	No Summary.	1	1AF	Y	Y	5.13	Section 5.2.3 of the DGEIS outlines standard mitigation if controlled blasting is required.
5.13-4	Construction	Mitigation	We recommend that the FEIS include a means to mitigate community impacts during construction.	4	No Summary.	14	14G	Y	Y	5.13	Section 5.13.3 of the DGEIS delineates mitigation measures for construction impacts to the community.
8.2-1	Growth Inducing Aspects	DGEIS Format	Scoping document chapter 9 (DGEIS chapter 8): The chapter in the DGEIS does not line up structurally with the list in the scoping document (pp. 60-61), which seriously hinders checking for adequacy. But in general, it can be said that the entire chapter reads more like an advertisement than a formal description.	1	The format of the Scoping Document is different than the DGEIS making it harder to review. Chapter 8 of the DGEIS reads like an advertisement.	2	2F	N	Y	8	During the development of the DGEIS, the Project Team changed the structure of this Chapter based on comments by City/Town Staff however all of the content listed in the Scoping Document is covered in the DGEIS. Chapter 8 specifically focuses on the how the investment in the Project impacts growth and the community character. This Chapter outlines how this Project aligns with many of the planning initiatives outlined in City/Town documents such as the Comprehensive Plans.
8.2-1	Growth Inducing Aspects	Tax Base	Another requirement is to "Discuss the growth in economic activity from both tourism and property value increases." There is a discussion of property value increase in the section referred to (8.2), but it's not netted out in a figure for the actual tax revenues on the re-assessed property, and there is no attempt at all to gauge the effects of an increase in tourism (if any).	1	The property value increase is not netted out in a figure for the actual tax revenues on the re-assessed property.	2	2H-1	N	N	8.2	From Scoping: "The Project would provide jobs, economic stimulus and tourism. These impacts will be estimated based on the Project's anticipated construction cost and employment." The existing assessment on the property is \$3,500,000. After full development the assessment of the property is estimated at \$236,000,000 by the County Assessor. The ultimate assessment is determined by the Assessor and the tax rate is set by the individual municipality/district. The tax revenue, as estimated with 2016 data, from the re-assessed property value will be \$4.3M for the Ithaca City School District (DGEIS Table 5.11-4), \$1.55M for the Town of Ithaca and \$2.39M for the City of Ithaca (DGEIS Table 5.11-2). All estimates are based on the Conceptual Site Payout Plan presented in the DGEIS as well as current tax rates.

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X-Reference	Comment Category	Comment Subcategory	Comment	Comment Summary No.	Summary of Comment	Commenter ID	Comment ID	Sub.	Rel	Relevant DGEIS	Response to Comment
8.2-1	Growth Inducing Aspects	Tax Base	Another requirement is to "Discuss the growth in economic activity from both tourism and property value increases." There is a discussion of property value increase in the section referred to (8.2), but it's not netted out in a figure for the actual tax revenues on the re-assessed property, and there is no attempt at all to gauge the effects of an increase in tourism (if any).	1	The property value increase is not netted out in a figure for the actual tax revenues on the re-assessed property.	18	18BA-1	Y	Y	8.2	See Response to 8.2-1.
8.2-2	Growth Inducing Aspects	Tourism	Another requirement is to "Discuss the growth in economic activity from both tourism and property value increases." There is a discussion of property value increase in the section referred to (8.2), but it's not netted out in a figure for the actual tax revenues on the re-assessed property, and there is no attempt at all to gauge the effects of an increase in tourism (if any).	2	There is no attempt at all to gauge the effects of an increase in tourism (if any).	2	2H-2	N	N	8.2	It is not anticipated that the Chain Works District will be a large tourism generator. For example, no destination type attractions are included in the Conceptual Site Layout Plan.
8.2-2	Growth Inducing Aspects	Tourism	Another requirement is to "Discuss the growth in economic activity from both tourism and property value increases." There is a discussion of property value increase in the section referred to (8.2), but it's not netted out in a figure for the actual tax revenues on the re-assessed property, and there is no attempt at all to gauge the effects of an increase in tourism (if any).	2	There is no attempt at all to gauge the effects of an increase in tourism (if any).	18	18BA-2	N	N	8.2	Repeat of 2H-2. See Response to 8.2-2.
8.3-1	Character of Community	Housing Market Study	Depth of Information Presented Diversity of housing unit types and pricing (first bullet point): This entire point is addressed in just three paragraphs in Section 8.3. It is stated that the project will include "units averaging 2 bedrooms, with a range from studios to 3 bedrooms" and are described as being located in "double loaded corridor apartment buildings", "loft and penthouse units in the historic buildings" and "townhouses". However, there is no attempt made to provide, as required, the projected number or percentage of the proposed 900+ residential units that will fall into each of these size and type categories. The only pricing information presented is for an "average 2 bedroom unit" projected to be "around \$2,370" which would "be affordable for households with a combined income of \$94,800". No pricing data is projected for the studio, 1 bedroom or 3 bedroom units nor is there any information provided concerning the expected pricing differentials across the various housing types.	1	There is no attempt made to provide, as required, the projected number or percentage of the proposed 900+ residential units that will fall into each of size and type categories or associated pricing	18	18BD	Y	Y	8.3	Of the proposed 915 units, it is anticipated that approximately 7% will be studio units, 55% one-bedroom units, 20% two-bedroom units, 3% three-bedroom units and 15% townhouse units. These are based on preliminary conceptual studies of the existing and proposed new development and subject to change as the Project is developed over its anticipated 7-10 year timeframe. The actual distribution of constructed unit types will be determined by market-driven needs at the time of design and during the Site Plan approval process phase. As indicated in Section 8.3, The average 2 bedroom unit is expected to rent for around \$2,370 based on the current market for similar units.
8.3-2	Character of Community	Housing Market Study	Market demand and need, comparison (second bullet point): Section 8.3 (DGEIS) presents a number of facts and figures relating to various aspects of the "existing housing market". However, this data is not consistent or cohesive and does not fulfill the requirement for an "evaluation of existing market demand". To begin with, the applicant does not specifically define the geographic boundaries of the housing market that may be impacted. At various times the market area is referred to as the "City of Ithaca", the "Town" (of Ithaca), "Tompkins County" and the "Ithaca Metropolitan Statistical Area". These are, indeed, very different units of geography across a range of variables. Without a well-defined, agreed upon definition of what constitutes the physical extent of the existing housing market, there is no valid basis on which to "evaluate" market demand nor can there be any valid "comparison to the proposed housing portion of the Project", both of which are required by the final Scoping Document. In addition, a robust discussion of this topic would also include the identification and description of specific consumer markets which the project is intending to target. Targeting allows for breaking the general population within the larger housing market into smaller demographic segments that differ across a number of economic, social and behavioral dimensions, thus providing a more solid basis on which to "evaluate existing market demand". Although there is some vague mention of targeting (e.g. "a wide spectrum of demographics", "senior population", "market for luxury, upscale and moderate/affordable new rental units") none of these are addressed in any depth and there is no attempt to tie them specifically to "existing market demand and need" as it relates to the proposed project.	2	The Project Sponsor does not identify the geographic boundary of the housing market study nor specific consumer market demographic.	18	18BE	Y	Y	8.3	The purpose of the GEIS is to address broad planning questions and long-term, cumulative environmental impacts from the development of the Project. The market study data is provided in this context to generally assess local conditions. The DGEIS presents information about existing housing stock, vacancy rates and the positive impact of the proposed 915 dwelling units to the existing housing shortage in the Ithaca area. The DGEIS references the Downtown Ithaca Alliance's 2012 study performed by the Danter Company which concludes that there is a demand for over 1,350 unit in the downtown Ithaca area. Tompkins County is in the process of drafting the Tompkins County Housing Needs Assessment. When this assessment is finalized and as other housing studies are performed, the Planning Boards will reference the most up to date studies during the Site Plan review.

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8.3-3	Character of Community	Housing Market Study	No inclusion of primary data. Housing market analysis, including the impacts of gentrification, is a highly complex undertaking, especially for a project of this size. Relying solely on secondary data sources (some of which are quite dated) seems inadequate to address this important and multi-faceted subject matter. See the 49+ page Transportation and Circulation, Appendix I of the DGEIS for an example of the appropriate inclusion of primary data collected by an expert consultant and used to identify potential impacts and suggested mitigation.	3	No inclusion of primary data for the housing market analysis.	3	3G	N	N	8.3	See Response to 8.3-2
8.3-3	Character of Community	Housing Market Study	No inclusion of primary data. Housing market analysis, including the impacts of gentrification, is a highly complex undertaking, especially for a project of this size. Relying solely on secondary data sources (some of which are quite dated) seems inadequate to address this important and multi-faceted subject matter. See the 49+ page Transportation and Circulation, Appendix I of the DGEIS for an example of the appropriate inclusion of primary data collected by an expert consultant and used to identify potential impacts and suggested mitigation.	3	No inclusion of primary data for the housing market analysis.	18	18BI	Y	Y	8.3	See Response to 8.3-2
8.3-4	Growth Inducing Aspects	Housing Market Study	(1 Page 2-36; 2 Page 8-3; 3 Page 8-4) Comment on population demographics. Chapter 2.7.7 (page 2-36) Anticipated Project Population. dGEIS Statement: Project will construct approx. 1,830 bedrooms or 915 units, and estimates a population of 1,830.1 Chapter 8.3 (page 8-3) Population Demographics. dGEIS Statement: The Project Sponsor plans to include units averaging 2 bedrooms, with a range from studios to 3 bedrooms. The average 2 bedroom unit is expected to rent for around \$2,370 based on the current market for similar units. At this price, units would be affordable for households with a combined income of \$94,800. Most households are expected to be one or two people based on the unit mix.2 ... Based on an assumed 1.75 adult residents per housing unit, the Project will house more people than it employs.3 Comment: No rationale or reference is provided as to how these inconsistent estimates were identified,	4	In Section 2.7.7 the anticipated population is 1,830 for the 915 dwelling units and Section 8.3 estimates 1.75 adult residents per dwelling unit. No reference is provided to the inconsistent estimates.	8	8L	Y	Y	8.3	Acknowledged. Section 8.3 of the DGEIS will be revised to match the total anticipated residential population of 1,830.
8.3-5	Growth Inducing Aspects	Housing Market Study	The Rutgers report proposes that in full build out, the project will house approximately 2,114 individuals, with 174 pre-school aged children, 119 elementary aged children, 46 middle school aged children and 37 high school aged children, with the numbers increasing as rents decline. Approximately 238 individuals will be of retirement age. The current City resident population of South Hill is approximately 2,100 residents, which is about the same population as the new development, and impacts on this neighborhood should be clearly spelled out and how these impacts will be mitigated. No proposed mitigations are detailed with regards to the cultural, social or recreational needs of its residents in terms of playgrounds, community centers, safe spaces to run or play games, specific social and recreational needs of seniors, or amenities for the needs of the very young or elderly. In my experience on City Council, our existing municipal recreational programs for youth fall short of meeting demands in both available resources, physical space and funding, and mitigating the needs of the new youth and senior population should be more fully developed than what is provided in the dGEIS.	5	The Rutgers Study cited by the Commenter presents their own estimate of population and believes that the existing municipal recreational programs for youth/seniors fall short of meeting demands in available resources, physical space and funding.	8	8N	Y	Y	8.3	The population estimate set forth in the DGEIS was developed based on the Site Program. The site will be programmed for such uses as outdoor markets, gatherings, festivals, community events, maker / artist spaces, galleries, and other uses, in partnership with engaged cultural organizations. The Chain Works District will provide the opportunity for community groups that serve a diverse population to develop specific social, cultural, and recreational programs to meet their specific needs. Potential partners in programming these spaces might be such groups as the Ithaca Youth Bureau, the YMCA, Cornell Cooperative Extension, Sciencenter, Tompkins County Public Library, Community School of Music and Arts, Greater Ithaca Activity Center, the Ithaca Children's Garden, Lifelong, Office for the Aging, Southside Community Center, Northside Community Center, Ithaca Generator, as well as potential partnerships with local colleges and universities. As the Project comes online, these issues will be reassessed during the Site Plan review to ensure that no adverse impacts have not been addressed in the GEIS.

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8.4-1	Character of Community	Gentrification	<p>8.3 & 8.4 Population/Demographics and Gentrification The following comments were submitted as part of the DGEIS Adequacy review process and did not receive a response (other than that the comments were not related to Adequacy): The Chain Works District proposal includes construction of 900+ residential units described as "market rate housing opportunities". Approximately half are slated to be located in the City of Ithaca and the remainder in the Town of Ithaca. It seems reasonable to speculate that the addition of such a large number of high-end residences to the existing housing stock of both municipalities is likely to result in a number of potential environmental impacts, both positive and negative. The applicant was instructed in the Final Scoping Document, Chapter 9: Growth Inducing Aspects and Character of Community, pages 60-61 to include in the DGEIS discussion of a number of specific potential impacts relating to housing, thus establishing the breadth of information required (bolding added): Discuss the diversity of housing unit types as well as pricing. This will include an estimate of the number of each housing type and size., Evaluate existing market demand and need with a comparison to the proposed housing portion of the Project, Discuss the gentrification of urban areas and the impacts to the City and Town with a concentration on the scale of the development and tax revenues. Each of the topics above was at least mentioned in the DGEIS, Chapter 8: Growth Inducing Aspects and Character of Community, in either Section 8.3: Population/Demographics or Section 8.4: Gentrification. However, given that these two sections together amount to approximately 2 pages in length, it is our opinion that none of the above points have been adequately addressed in terms of both the depth and type/source of information presented. Without data drawn from a wider range of sources that can serve as the basis for a more in-depth analysis of this complex set of issues, we feel strongly that readers of the DGEIS do not have adequate information to make informed decisions about these important components of the environmental analysis. Clarifying comments are as follows:</p>	1	The DGEIS does not have adequate detail to address existing market demand, the potential impacts of the proposed housing portion of the Project and gentrification of urban areas.	18	18BC	Y	Y	8.4	<p>The purpose of a GEIS is to address broad planning questions. See Comment Responses for Section 8.3 regarding the existing market demand and the potential impacts of the proposed housing portion of the Project. The DGEIS cites the 2012 DIA Housing Market Demand Study which documents a need for up to 1,350 units in the downtown area. The proposed 915 dwelling units in CWD will assist in meeting the demand.</p> <p>As to the third part of the Comment, gentrification is defined generally as the arrival of wealthier people in an existing urban residential district which includes a related increase in rents and property values. This in turn changes the district's character and culture. The term is often used negatively, suggesting the displacement of poor communities by rich outsiders. The DGEIS finds that the proposed project does not displace any residents therefore on-site gentrification will not occur.</p> <p>Gentrification generally occurs in areas where commercial and residential land is cheap relative to other areas within the City. A review of recently sold properties indicate the transactions within the South Hill area are similar if not slightly higher than the average sales price in other residential areas of the City. For example, there are two single-family residential properties currently listed for sale in the immediate vicinity of the Project site at \$297,000 and \$299,000. There are three comparable properties for sale on W. Green and W. Clinton Streets (Near NYS 34) for \$152,000, \$163,000 and \$199,000. Therefore this area of the City/Town does not lend itself to gentrification.</p> <p>The proposed Project will improve the overall neighborhood but it is not anticipated to have large impacts to the overall tax assessments to the adjacent parcels. In fact, the added tax base should help stabilize City, Town, School District and other associated tax districts by increasing the tax base by an estimated \$232,500,000 according to the County Assessor (DGEIS Table 5.11-4).</p> <p>As outlined in the SEQR Handbook, the DGEIS demonstrates how the proposed action is capable of serving a public use, benefit, or purpose. Specifically answering the Comment, the proposed project provides additional housing to reduce gentrification pressures on other areas of the community and provides increased tax revenues through additions to the local taxable base and fulfillment of shopping.</p>
8.4-2	Character of Community	Gentrification	<p>Gentrification and impacts (third bullet point): While we agree that gentrification is a "difficult phenomenon to measure", this does not exempt the applicant from presenting a more in-depth analysis than the one page that is currently offered. A vast cross-disciplinary literature concerning gentrification currently exists, spanning many decades. None of this literature is referenced in Section 8.4 (DGEIS) where the subject is discussed. While a reasonable definition of gentrification is presented as the basis for the discussion, of the three "metrics" contained within it, only one, "rising housing prices", is significantly addressed. The remaining two are briefly mentioned but only as they relate to current conditions in the City of Ithaca. One of these metrics, "displacement of people from longstanding communities" is, in fact, implied to be irrelevant in this case because, "...converting an area that is not residential into a new neighborhood, is by definition not resulting in the displacement of existing households, one of the key factors in gentrification". The Town of Ithaca, and specifically the South Hill neighborhood, which is very vulnerable to the possibility of gentrification as a result of the residential portion of the proposed project, is barely mentioned.</p>	2	While gentrification is a "difficult phenomenon to measure", this does not exempt the Project Sponsor from presenting a more in-depth analysis than the one page that is currently offered.	18	18BF	Y	Y	8.4	See Response to Comment 8.4-1.

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8.4-2	Character of Community	Gentrification	(Item #3 in 3B) While I agree that gentrification is a "difficult phenomenon to measure", this does not exempt the applicant from presenting a more in-depth analysis than the one page that is currently offered. A vast cross-disciplinary literature concerning gentrification currently exists, spanning many decades. None of this literature is referenced in Section 8.4 (DGEIS) where the subject is discussed. While a reasonable definition of gentrification is presented as the basis for the discussion, of the three "metrics" contained within it, only one, "rising housing prices", is significantly addressed. The remaining two are briefly mentioned but only as they relate to current conditions in the City of Ithaca. One of these metrics, "displacement of people from longstanding communities" is, in fact, implied to be irrelevant in this case because, "...converting an area that is not residential into a new neighborhood, is by definition not resulting in the displacement of existing households, one of the key factors in gentrification". The Town of Ithaca, and specifically the South Hill neighborhood, which is very vulnerable to the possibility of gentrification as a result of the residential portion of the proposed project, is barely mentioned. The final paragraph of Section 8 (DGEIS) states that, "While the Project does not plan to include any below market rate housing, the additional supply of units allowed under the proposed zoning action can be expected to help slow, reduce, or prevent gentrification in the surrounding neighborhoods by increasing the City's limited housing supply (emphasis added)." This is particularly troubling as it draws conclusions based on little or no substantive data or analysis. Further, as stated in the Scoping Document, the applicant is required to discuss gentrification as it specifically relates to the "scale" of the proposed project. There is no evidence that the applicant has attempted to fulfill this requirement. Given the cursory overview presented in Section 8.4 (DGEIS), readers will find little to assist them in wading through the complex subject of gentrification and even less aid in determining the potential environmental impacts of the residential portion of the proposed project.	2	While gentrification is a "difficult phenomenon to measure", this does not exempt the applicant from presenting a more in-depth analysis than the one page that is currently offered.	3	3E	N	N	8.4	See Response to Comment 8.4-1.
8.4-3	Character of Community	Gentrification	The final paragraph of Section 8 (DGEIS) states that, "While the Project does not plan to include any below market rate housing, the additional supply of units allowed under the proposed zoning action can be expected to help slow, reduce, or prevent gentrification in the surrounding neighborhoods by increasing the City's limited housing supply (emphasis added)." This is particularly troubling as it draws conclusions based on little or no substantive data or analysis. Further, as stated in the Scoping Document, the applicant is required to discuss gentrification as it specifically relates to the "scale" of the proposed project. There is no evidence that the applicant has attempted to fulfill this requirement. Given the cursory overview presented in Section 8.4 (DGEIS), readers will find little to assist them in wading through the complex subject of gentrification and even less aid in determining the potential environmental impacts of the residential portion of the proposed project.	3	There is no evidence that the Project Sponsor has attempted to address gentrification as it specifically relates to the scale of the proposed Project.	18	18BG	Y	Y	8.4	See Response to Comment 8.4-1.
8.4-4	Character of Community	Gentrification	The applicant was instructed in the Final Scoping Document, Chapter 9: Growth Inducing Aspects and Character of Community, pages 60-61 to include in the DGEIS discussion of a number of specific potential impacts relating to housing, thus establishing the breadth of information required (bolding added): 1) Discuss the diversity of housing unit types as well as pricing. This will include an estimate of the number of each housing type and size. 2) Evaluate existing market demand and need with a comparison to the proposed housing portion of the Project. 3) Discuss the gentrification of urban areas and the impacts to the City and Town with a concentration on the scale of the development and tax revenues. Each of the topics above was at least mentioned in the DGEIS, Chapter 8: Growth Inducing Aspects and Character of Community, in either Section 8.3: Population/Demographics or Section 8.4: Gentrification. However, given that these two sections together amount to approximately 2 pages in length, it is my opinion that none of the above points have been adequately addressed in terms of both the depth and type/source of information presented. Without data drawn from a wider range of sources that can serve as the basis for a more in-depth analysis of this complex set of issues, I feel strongly that readers of the DGEIS do not have adequate information to make informed decisions about these important components of the environmental analysis.	4	Break into three parts: 3) Discuss the gentrification of urban areas and the impacts to the City and Town with a concentration on the scale of the development and tax revenues	3	3B-3	N	N	8.4	See Response to Comment 8.4-1.

**CHAIN WORKS DISTRICT
FINAL DGEIS COMMENT MATRIX**

X-Reference	Comment Category	Comment Subcategory	Comment	Comment Summary No.	Summary of Comment	Commenter ID	Comment ID	Sub.	Rel	Relevant DGEIS	Response to Comment
9-1	Use and Conservation of Energy	Alternative Energy	Chapter 9: Effect of the Proposed Project on the Use and Conservation of Energy The City of Ithaca recently received money from NYS to look at the Chain Works District as one of two areas in the city where there could be a lot of alternative energy generation for use not only on site, but in surrounding areas as well (e.g. solar, wind, geothermal). The DGEIS is vague as to what's being looked at in terms of alternative energy. There's nothing about the scope and timing of the city study, just tantalizing glimpses and statements about LEED ND. The Final EIS should be much more specific as to what the city study is looking at in terms of alternative energy and what commitments the Chain Works applicant will make in terms of their contribution to alternative energy generation. The FEIS should include onsite energy generation estimates and energy demand estimates. Also, what is the timing on the city's study? How does it compare with the proposed Chain Works construction phasing?	1	The DGEIS is vague as to what specific alternative energy sources will be utilized. Also the Project is included in the City of Ithaca NY Prize Grant; provide more details of the Study.	18	18BK	Y	Y	9	The purpose of the GEIS is to address broad planning questions. The timeframe for the development of the Project is 7 to 10 years. The means of generating alternative energy is rapidly changing such that today's state of the art technology will be obsolete when implementing later phases of the CWD development. Therefore, the DGEIS approach is to state generically the multiple alternative energy techniques may be utilized with a specific performance goal of achieving at least a 70% reduction in fossil fuel use in compliance with the Architecture 2030 Challenge. See also response to Comment 2.5-7.
	DGEIS	Errata/ Clarifications	Chapter 3: Introduction (this is mislabeled in the Table of Contents and should state "Reasonable Alternatives") The parameters used in the maximum development scenario are different than the parameters in the Scoping Document: 2.125 million square feet in the DGEIS as opposed to 2.65 million square feet in the Scoping Document. The floor area ratio is also less: 1.25 in the DGEIS vs. 1.5 in the Scoping. Why have these parameters changed?	1	Chapter 3 is mislabeled in the DGEIS. Also, the maximum development scenario was reduced from 2.65 MSF in the Scoping Document to 2.125 MSF in the DGEIS.	18	18X	Y	Y	3	Noted and corrected. During the development of the DGEIS, it was determined that the 2.65 MSF maximum development scenario was not feasible therefore that alternative analysis was scaled back to 2.125 MSF.
	DGEIS	Errata/ Clarifications	5.1.4.2 Mitigation to Form and Intensity of Uses Table 5.1-4 describes permitted uses in the four subareas, "per Existing City Zoning". City of Ithaca zoning regulations do not apply in the Town of Ithaca. Please correct.	2	Clarify that specific City zoning regulations do not apply to the Town and vice versa.	18	18Z	Y	Y	5.1	Acknowledged. The PUD/PDZ outline specific regulations for development within the CWD by Sub Area. Where applicable, the PUD/PDZ utilizes existing regulations. The intent of this reference is quite clear, which is to allow the same form and intensity of uses across municipal boundaries to avoid conflicting ordinances. Language can be added or modified to more clearly describe the intent.