

COMMENT G-1 (Air Quality):

I have not heard anyone address the rather frequent, as of late, odors coming from either the garbage transfer station or the sewer plant, or both. I assume that Steamboat Landing has been fortunate and that this has not been an ongoing problem for them. But what happens when you add 860 units, plus hotels and businesses to the picture? Most likely, those odors will be a daily occurrence, not to mention, the possible health risks to us all. Would anyone want to live in the vicinity of a waterfront if they cannot open their windows or go outside because of toxic gases in the air?

Ms. Barbara Hall, resident, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009, Section 86, lines 5-23; Section 87, lines 1-23, pp.76-77

RESPONSE G-1 (Air Quality):

The FEIS describes measures the County could impose to reduce any existing odor issue associated with the solid waste transfer station. The FEIS also describes how several existing industrial uses will be removed in the future, either as part of the proposed redevelopment or to meet the needs of the Glen Cove Master Plan and GPURP. It is not anticipated that odors would significantly affect quality of life for future residents of the Glen Isle redevelopment.

COMMENT G-2 (Air Quality):

Air Quality

The LOS Screening Analysis is incorrect in that it includes two (2) unsignalized intersections. Unsignalized intersections are always omitted from air quality screening.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-2 (Air Quality):

The intersection of Dixon Street and Herb Hill Road/Garvies Point Road is signalized in the mitigation scenario and has been kept in LOS screening analysis tables for inclusion in the FEIS. The intersection of Route 107 and Glen Head Road is controlled by a stop sign and was included in the analysis as a conservative measure. For the FEIS, this intersection has been excluded from the analysis tables at the request of the commenting reviewer.

COMMENT G-3 (Air Quality):

The Capture Criteria analysis should list (and exclude, as applicable) each of the five required criteria involved in this step: decreases in source-receptor distances, intersection (as opposed to approach) volume and emission increases, the number of queued lanes-, and- approach travel speeds).

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-3 (Air Quality):

The applicable determinants of the capture criteria analysis are listed in Chapter III-G, Section 1 c) "Methodology for Predicting Pollutant Concentrations" and are also presented with an expanded format in Attachment 1 of this response to comments.

COMMENT G-4 (Air Quality):

The Volume Threshold Screening should include a discussion of the involved steps in calculating the volume threshold for each intersection.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-4 (Air Quality):

The steps involved in determining the volume threshold are listed in Chapter III-G, Section 1 c) "Methodology for Predicting Pollutant Concentrations" and are also presented with an expanded format in Attachment 1 of this response to comments.

COMMENT G-5 (Air Quality):

Regarding the EPM Screening Analysis spreadsheet in the Appendix:

This analysis should not include the unsignalized intersections, as these intersections are always eliminated from the need for air quality analysis. The analysis also should not include Existing or No Build Level of Service tables, as they have no bearing on Air Quality screening.

The table needs to define the term "EF" (which stands for "Emission Factor") in the column headings for the volume threshold screening.

The table is missing the intersection Level of Service for Herb Hill Road/Garvies Point Road/Dickson Street. According to the Traffic Study, this intersection will operate at LOS A in the Signalized Mitigated Build condition, so this intersection should not have any further screening indicated in the table. Also according to the Traffic Study, a roundabout is a potential alternative mitigation measure. This second alternative should be noted, with the notation that, since a roundabout is an unsignalized intersection, under that alternative, the intersection would not pass through the screening thresholds to require air quality analysis.

The table footer includes a note, "No project specific speeds are provided. Used speed limit when known or assume 25 mph when no other info available." According to the Traffic Study, the traffic analyses were done using Synchro software. This software yields speed reports for adjacent intersections - no additional analysis is needed to provide such reports. The Synchro Arterial Speed Reports need to be obtained from the traffic engineering consultant for the project, and the results need to be input into the Air Quality screening analysis.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-5 (Air Quality):

Please see Response G-2 for a discussion of unsignalized intersections used in the analysis. With regards to the inclusion of existing and no-build level of service data for traffic study intersections, it is noted that this information has no bearing on the air quality screening analysis. As requested by the commenting reviewer, this data has been omitted from the FEIS submittal.

The acronym EF has been footnoted in the technical appendix table to indicate that EF stands for "Emission Factor".

The intersection of Dixon Street and Herb Hill Road/Garvies Point Road is controlled by a stop sign in the build without mitigation scenario and was included in the analysis as a conservative measure. In the FEIS, this intersection has been excluded from further analysis beyond LOS screening at the request of the commenting reviewer. The analysis has also made note of the second alternative for this intersection (i.e., a roundabout).

The Synchro files obtained from the traffic engineering consultant do not include the vehicle speed data (speed runs). Conservative default values are incorporated into the FEIS Air Quality screening analysis.

COMMENT G-6 (Air Quality):

Regarding Table 3-c in the Appendix, the values which correspond to intersections that pass through to Level 3 screening (Volume Threshold) should be circled and labeled.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-6 (Air Quality):

As requested by the commenting reviewer, corresponding values in Table 3-c that are relevant to Level 3 screening (Volume Threshold) have been highlighted and labeled in the FEIS technical appendix.

COMMENT G-7 (Air Quality):

Tables 3.5-2 and 3.5-3 in the Appendix, the "Existing" and "No Build" Level of Service summaries, are irrelevant to air quality screening, which relies on the Build or Mitigated Build levels of service. Any Level of Service tables in the Air Quality screening Appendix should likewise omit unsignalized intersections.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-7 (Air Quality):

As stated in the response to Comment G-5, with regards to the inclusion of existing and no-build level of service data for traffic study intersections, it is noted that this information has no bearing on the air quality screening analysis. As requested by the commenting reviewer, this data has been omitted from the FEIS submittal.

COMMENT G-8 (Air Quality):

The Construction Analysis should refer to the probability of the potential release of subsurface contaminants during construction, and the Site Management Plan measures which will be implemented to prevent such release.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-8 (Air Quality):

Due to the potential release of subsurface contaminants during construction (e.g., excavation activities), there is a potential that some contaminants could become airborne. The project's NYSDEC approved Site Management Plan (SMP) and/or construction documents will contain procedures to mitigate airborne releases of these contaminants; more information on these procedures will be forthcoming as they are refined during the site plan approval phase. The construction analysis in the FEIS air quality chapter includes text to indicate this.

COMMENT G-9 (Air Quality):

The DEIS is correct that the Konica Minolta site is no longer active. However, the air quality text should also mention the content of the Subsurface Environmental Conditions, which states that the site has VOCs as chemicals of concern, and that there is no (as of yet) date for completion of clean-up.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-9 (Air Quality):

Subsurface environmental conditions are addressed in Chapter III-B and indicate that VOCs are a chemical of concern for the Konica Minolta site. This fact is also noted in the FEIS air quality chapter.

COMMENT G-10 (Air Quality):

The Mitigation Measures-Construction discussion should include verbiage about air impacts from construction activity with respect to unearthing subsurface pollutants in addition to "the potential to adversely affect air quality as a result of diesel emissions." The mitigation measures should, for consistency with the rest of the DEIS, discuss environmental remediation and compliance with the Site Management Plan. This is especially important given how nearly every environmentally sub-par site is noted with "VOCs" or "SVOCs" as a "chemical of concern" in the Subsurface Environmental Conditions section.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-10 (Air Quality):

The FEIS includes added text to the construction analysis (in the air quality chapter) describing compliance with the site management plan and also makes note of the health and safety plan and community air monitoring plan (which conforms with the NYSDEC DER-10 manual).

COMMENT G-11 (Air Quality):

Page III.G-24: the word "propose" in the 2nd paragraph, 10th line should be "proposed."

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE G-11 (Air Quality):

The FEIS text on page III.G-24 now includes the word "proposed" in the second paragraph.

COMMENT G-12:

Air Quality

The potential for air quality impacts are of particular concern of Sea Cliff. The EIS should address both stationary and mobile source impacts directly as they relate to Sea Cliff.

Bruce Kennedy, Mayor, Village of Sea Cliff, letter dated July 17, 2009.

RESPONSE G-12:

As stated in the FEIS, the proposed project would not involve the addition of any new large stationary emission sources. The only stationary source of air emissions would be from fuel combustion (i.e., natural gas) in the various heating system boilers serving the proposed development sites (spread across 56 acres). Emissions from these boilers would not be a significant source of air pollution and would not be expected to cause or contribute to any new instances of air pollutants violating an ambient air quality standard. Furthermore, any onsite stationary sources would comply with all applicable NYSDEC air regulations including, if necessary, obtaining air permits. Therefore, it is not expected that the Village of Sea Cliff would experience any adverse air quality impacts from the proposed development.

Mobile source impacts were analyzed in accordance with procedures outlined in the New York State Department of Transportation (NYSDOT) *Environmental Procedures Manual (EPM)*. The study included 19 intersections in the Glen Cove area. Since the analysis had determined that no significant air quality impacts would occur at intersections most affected by project related traffic, it can be concluded that the Village of Sea Cliff would likewise experience no adverse air quality impacts from the proposed development.

COMMENT G-13:

d. Air Quality

"Short-term air quality impacts are discussed... " but it does not say what constitutes "Short-term". Seven years of air quality impacts?

David S. Nieri, letter dated July 18, 2009.

RESPONSE G-13:

When discussing short term air quality modeling and impacts, by popular convention the phrase "short-term" refers to impacts of 24 hours or less. Impacts of 24 hours or less are also referred to

as "short term" in the code of federal regulations under 40 CFR Part 51, Appendix W (also known as the Guideline on USEPA Approved Air Quality Models).

COMMENT G-14:

As currently documented the smell of the small Pickle Factory can be picked up for miles around Garvies Point Road.

Mary Normandia, letter dated July 20, 2009.

RESPONSE G-14:

Examination/analysis of odors emitted from the pickle factory is beyond the approved scope of the FEIS.

COMMENT G-15:

29. Section III.G.1.a (*Environmental Impacts and Mitigation Measures: Air Quality: Introduction: Pollutants for Analysis*), page III.G-3, 3rd ¶- The DEIS states "the proposed project would not result in any significant increases in truck traffic near the project site or in the region, and therefore, an analysis of potential impacts from PM [particulate matter] was not warranted for mobile sources." It should be indicated whether an increase in PM is expected from the use of the proposed shuttle bus service. Additionally, the FEIS should indicate whether or not the proposed shuttle service is indeed to be a clean-fuel vehicle.

Steven Perotta, Cashin Spinelli & Ferretti, LLC, letter dated July 20, 2009.

RESPONSE G-15:

The proposed shuttle bus service to the LIRR would not constitute a significant amount of vehicle trips per day. Therefore shuttle buses are not expected to emit a significant amount of particulate matter to the atmosphere. Since the project is at the conceptual site plan stage, the engine details of the shuttle buses that will eventually be employed are not yet known, although it is expected that they will be efficient and/or clean fuel vehicles. In addition, the FEIS traffic study indicates that overall traffic volumes would be reduced if the shuttle buses were employed and therefore, would have a positive affect on air quality.

COMMENT G-16:

30. Section III.G.1.b (*Environmental Impacts and Mitigation Measures: Air Quality: Introduction: Air Quality Standards*), page III.G-5, 5th ¶ - The DEIS mentions New York City's status as an area of non-attainment for CO, but no mention is made of Nassau County's status regarding same.

Steven Perotta, Cashin Spinelli & Ferretti, LLC, letter dated July 20, 2009.

RESPONSE G-16:

Nassau County is in attainment for carbon monoxide.

COMMENT G-17 (Air Quality):

The DEIS should update page III-G-8 to reflect the newly released NYSDEC Guidance, Assessing Energy Use and Greenhouse Gas Emissions in Environmental Impact Statements which is now available to the public

(http://www.dec.ny.gov/docs/administration_pdf/edighgpolicy.pdf).

The Department recognizes that the nature of the proposed project lends itself to a design that Helps reduce GHG emissions. The clustering of living units, the reliance on mass transit (ferry, bus, bus-to-rail) and the energy conservation measures cited in Sections III & X, such as "green building" components and the seeking of Leadership in Energy and Environmental Design (LEED) certification, all contribute to the mitigation of energy use, thereby reducing the emission of greenhouse gases.

Roger Evans, Regional Permit Administrator, New York State Department of Environmental Conservation, Division of Environmental Permits, Region One, letter dated July 31, 2009

RESPONSE G-17 (Air Quality):

It is acknowledged that the NYSDEC has formalized and published its Guidance for Assessing Energy Use and Greenhouse Gas Emissions in Environmental Impact Statements. The GHG analysis includes text on page III.G-1 to reflect that this guidance is being referenced.

COMMENT G-18 (Air Quality):

The DEIS goes into some detail on the construction aspects of air quality. The DEIS also indicates that "energy components of the Proposed Action would be provided by either the Long Island Power Authority ("LIPA") or, KeySpan." In Section X, Page X, it is stated that "Heat and hot water will likely be fueled natural gas, which is cleaner burning and more efficient"

The DEIS does not appear to address the boilers that will be required to generate this heat and hot water. The DEIS should address the air permitting and GHG aspects of this power generation. The identification of this source is germane to both GHG considerations and whether or not Art. 19 permits are required.

Roger Evans, Regional Permit Administrator, New York State Department of Environmental Conservation, Division of Environmental Permits, Region One, letter dated July 31, 2009

RESPONSE G-18 (Air Quality):

A brief discussion of the heating system boilers is provided on page III-G-3 under the heading for particulate matter. It states that the proposed project would not add any new large stationary sources and specifies the development size that would be served by any natural gas boilers. GHG aspects of the onsite heating system boilers used for hot water and space heating is addressed in the FEIS in Section 4 (Mitigation) under the heading "Energy Systems and Appliances". Additional text regarding air permitting procedures and compliance with applicable NYSDEC air quality regulations under Article 19 is also included in Chapter III-G.

COMMENT G-19 (Air Quality):

Greenhouse Gases and Air Quality, The DEIS should be updated to reflect the recently issued NYSDEC policy guidance. The DEIS should identify the source of the heat and hot water for the proposed project for permitting considerations.

Roger Evans, Regional Permit Administrator, New York State Department of Environmental Conservation, Division of Environmental Permits, Region One, letter dated July 31, 2009

RESPONSE G-19 (Air Quality):

The GHG analysis currently reflects the NYSDEC policy guidance. The heat and hot water systems are discussed above in the response to comment 18.