

COMMENTS ON DRAFT SCOPING DOCUMENT

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory A. Traffic		
	<i>Comment No. 1A:</i> The EIS should examine the combined effects of handling both commercial and DSNY-managed Waste.	General
	<i>Response No. 1A:</i> The DEIS will apply CEQR criteria to evaluate the potential impacts associated with waste deliveries by both DSNY and commercial carters to the Converted MTSS.	
	<i>Comment No. 2A:</i> Traffic analyses should be performed at all major intersections, i.e., intersections should not be screened out: Metropolitan Avenue, Broadway, Leonard Street and Manhattan Avenue (Brooklyn); York Avenue (Manhattan); the Linden Place exit off the Whitestone Expressway and the 20 th Avenue intersection, and Grand Avenue (Queens); and Shore Drive and Bayview Parkway (Southwest Brooklyn on weekends).	Greenpoint, East 91 st Street, North Shore and Southwest Brooklyn
	<i>Response No. 2A:</i> Traffic analyses were performed at major intersections in accordance with CEQR guidelines. Because it is impractical to perform analyses at all intersections through which project-related traffic is routed, representative intersections were chosen for analysis based upon screening thresholds set forth in the CEQR guidelines. Of the above-noted intersections, analyses were performed on Metropolitan and York Avenues. Broadway, Leonard Street and Manhattan Avenue are not close enough to any proposed facility or Alternative to have significant amounts of project-generated traffic in any given hour. For Linden Place, it is unlikely that more than five project-related trucks per hour would pass this intersection, thus it falls below the CEQR screening threshold of 33 DSNY trucks. 20 th Avenue and Grand Avenue are not truck routes; no analysis needs to be undertaken.	
	<i>Comment No. 3A:</i> The EIS should account for weekend and seasonal traffic impacts in Southwest Brooklyn at Bay Parkway and Shore Drive.	Southwest Brooklyn
	<i>Response No. 3A:</i> In analyzing the average peak day, worst-case conditions were examined. From 7-day ATR counts along major roadways near each facility, reduced traffic volumes occur on the weekends.	
	<i>Comment No. 4A:</i> The proposed West 59 th Street MTS should not conflict with future relocation of Miller Highway (West Side Highway). It currently passes above Riverside Park South from West 72 nd Street to West 59 th Street, passes in front of the MTS and comes to grade at West 57 th Street. The highway is being relocated eastward into a tunnel under Riverside Park South. (Final EIS and Findings, ROD issued in 2001.) The SWMP should consider alternatives for truck access to the MTS.	West 59 th Street
	<i>Response No. 4A:</i> The relocation will not be completed before the MTS Build Year of 2006. If and when the relocation project is revived, it would need to consider maintaining truck access to the MTS in its analysis.	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory A. Traffic		
	<i>Comment No. 5A:</i> The EIS should consider the building of a flyway so that trucks could completely bypass ground level pedestrians in Hudson River Park.	West 59 th Street
	<i>Response No. 5A:</i> Creating a flyway so that trucks could bypass ground-level pedestrians in Hudson River Park would require demapping and elevating West 59 th Street from 11 th Avenue to 12 th Avenue. In addition, the flyway would have to cross Route 9A. The complexity of the planning and design issues associated with this concept is beyond the scope of this project.	
	<i>Comment No. 6A:</i> The EIS should consider traffic impacts when the maximum number of trucks are on the streets.	General
	<i>Response No. 6A:</i> The traffic analysis in the DEIS will evaluate three peak hours when potential traffic impacts would most likely occur: (i) the peak hour for morning background traffic, including facility-generated traffic at that time; (ii) the peak hour for facility-generated traffic, including background traffic at that time; and (iii) the peak hour for afternoon traffic, including facility-generated traffic at that time.	
	<i>Comment No. 7A:</i> The EIS should examine the traffic impacts due to newly constructed commercial stores, e.g., Lowe's, Pathmark and IKEA in the Hamilton Avenue MTS area, the former Flushing Airport area and the Linden Place exit off the Whitestone Expressway for the North Shore MTS, and other area changes (new Kosciusko Bridge).	Hamilton Avenue, North Shore
	<i>Response No. 7A:</i> These traffic sources will all be accounted for in existing background or Future No-Build assumptions. This information will be developed through, among other things, a process of consultation with Borough NYCDPC staff that identifies all new development.	
	<i>Comment No. 8A:</i> The EIS should examine the traffic impacts from land-based private transfer stations.	South Bronx, Greenpoint
	<i>Response No. 8A:</i> Land-based private transfer stations in the vicinity of the Converted MTSs or Alternatives will be accounted for in the collection of baseline traffic data for Existing Conditions and in the Future No-Build scenario, which includes trucks from land-based private transfer stations and other new sources that will be generating background traffic, and also applies escalation to the Existing Conditions traffic volumes.	
	<i>Comment No. 9A:</i> A number of speakers wanted the EIS to examine the impacts of increased traffic on park usage (Asphalt Green, Hudson River Park, Riverside Park).	East 91 st Street, West 59 th Street and West 135 th Street

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory A. Traffic		
	<p>Response No. 9A: The Converted MTSs located near these parks are designed with six tipping bays and with ramps to support queuing trucks. (The existing ramp at the East 91st Street MTS at the intersection of York Avenue and East 91st Street is also designed to support queuing trucks.) The truck ramps at the Converted MTSs at East 91st Street, West 59th Street and West 135th Street have the capacity to queue 18, 10 and 17 trucks, respectively. This ramp capacity in combination with the six truck bays on the tipping floor and the expected truck turnaround time of 10 minutes will be sufficient to avoid queuing of trucks on local street during peak arrival hours. If necessary, DSNY will use management practices, such as timing the dispatch of collection vehicles, so that queuing of trucks on the local access roads to the MTSs will not occur. Based upon these facility design and operating characteristics, the DEIS will evaluate potential traffic impacts based on the peak hour arrival rate for collection vehicles at the Converted MTSs or Alternatives.</p>	
	<p>Comment No. 10A: The EIS should explain the accuracy of the truck trip assumptions.</p>	General
	<p>Response No. 10A: DSNY directs its collection vehicles drivers to the routes they must take to travel between a Community District or a DSNY garage and an MTS or Alternative site. Generally, trucks are required to move from the end point of their collection route to the nearest NYCDOT-designated truck route to travel to an MTS/Alternative. Vehicles move from truck route to local access roads, as necessary, if truck routes do not provide direct access. Intersections where trucks converge as they approach an MTS or Alternative are evaluated for traffic impacts in accordance with CEQR and NYCDOT criteria. The volume of truck trips is based on historical waste generation within each MTS/Alternative wasteshed, adjusted upwards to build a margin of conservatism into the analysis. The hourly profile of anticipated truck arrival times at the MTSs is also based on historical data.</p>	
	<p>Comment No. 11A: Traffic impacts should be examined from 8:00 p.m. to 8:00 a.m.</p>	General

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory A. Traffic		
	<p>Response No. 11A: The worst hours for background traffic conditions are daytime hours. The majority of DSNY-managed Waste deliveries to an MTS are also during the daytime. Although the peak waste delivery hour for DSNY-managed Waste varies among facilities, it is typically within the 10:00 a.m. to 1:00 p.m. period. The peak daytime truck arrival hour does not typically coincide with the background traffic peak hour. If there are no significant unmitigatable adverse traffic impacts during the daytime hours, there would also be no significant adverse unmitigatable traffic impacts during the 8:00 p.m. to 8:00 a.m. period when there are lower background traffic volumes, higher (better) levels of service and a lower number of potential waste hauling vehicles. However, traffic-related noise impacts are greatest compared to background noise during nighttime hours. The DEIS will evaluate traffic-related noise impacts during the quietest hour.</p>	
	<p>Comment No. 12A: The potential for conflicts: (i) with existing ferry service at the 90th Street pier and barge traffic; and (ii) between collection vehicles and bus traffic in the vicinity of York and East 91st Street should be examined.</p>	East 91 st Street
	<p>Response No. 12A: To supplement information developed in previous traffic analyses and to respond to traffic concerns expressed at the East 91st Street Public Scoping Meeting regarding bus traffic, additional traffic observations were made at the York Avenue and East 91st Street entrance on July 19th and 20th, 2004 between 7:00 a.m. and 7:00 p.m. During this period, no more than four school buses were observed during any given hour dropping off/picking up children at Asphalt Green and typically there were only one to two buses. The average wait for the bus was 54 minutes. The peak number of City buses was 63 in a given hour, of which approximately 50% were articulated. Background traffic volumes were counted over the period. Overall, the existing number of buses and background traffic volumes observed were lower than those analyzed in the MTS Environmental Evaluation, which would indicate that the traffic analysis that will be presented in the DEIS is conservative. With regard to the question on ferry service, see Response No. 12V.</p>	
	<p>Comment No. 13A: The construction of a special, truck-only ramp should be considered as part of the Kosciusko Bridge reconstruction.</p> <p>Response No. 13A: DSNY is not opposed to this, but it is a subject appropriately addressed in the planning process for the Kosciusko Bridge reconstruction.</p>	Greenpoint
	<p>Comment No. 14A: How does the number of trucks for the Conversion Program compare to the number of trucks previously sent to the MTSs?</p>	General

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory A. Traffic		
	<p>Response No. 14A: The capacity scenario that DSNY has used to plan the MTS Conversion Program is based on an evaluation of historical data over several years, going back to 1998, the year when seven of the eight MTSs (except the South Bronx, which was closed in 1997) were in operation. An annual average peak ton per day (tpd) value (the average of the peak day each week, i.e., 52 Tuesdays) is used in planning to assure sufficient capacity and appropriately evaluate impacts. Although there have been some shifts in tonnage among wastesheds, the total average peak tpd in the capacity scenario (13,120 tpd) approximates the average peak tpd (13,711 tpd) for 1998. In the DEIS evaluation of potential off-site traffic, air quality and noise impacts, the average peak tpd values for specific MTS wastesheds will be increased to build conservatism into the analysis.</p>	
	<p>Comment No. 15A: Will an effort be made to avoid truck traffic on residential streets?</p>	General
	<p>Response No. 15A: See Response No. 10A, above.</p>	
	<p>Comment No. 16A: Traffic analyses should consider articulated buses on East 86th Street, York Avenue and First Avenue, and that there can be no queuing of DSNY trucks on the same block as an articulated bus stop.</p>	East 91 st Street
	<p>Response No. 16A: See Response No. 9A and No. 12A.</p>	
	<p>Comment No. 17A: Additional traffic analyses should be undertaken at the following intersections: West 56th Street and Route 9A, West 57th Street and 11th Avenue, and West 59th Street and 10th Avenue.</p>	West 59 th Street
	<p>Response No. 17A: The traffic analysis in the MTS Environmental Evaluation considered these intersections. Traffic analysis was performed at West 59th Street and 12th Avenue (the worst-case intersection at which all traffic to and from the MTS would converge) to confirm that there would be no traffic impacts from the MTS. Less than 37 PCEs would travel through all other intersections in the study area. A field inspection of the other intersections did not indicate that a traffic analysis would be necessary at these intersections due to existing geometric or traffic conditions at these intersections.</p>	
	<p>Comment No. 18A: The methodology of utilizing a PCE ratio of 1 truck = 1½ cars is incorrectly used, since DSNY truck impacts are experienced on local streets, not on highways. DSNY trucks have “avoidance impacts” on other adjacent vehicles that may significantly add to the truck traffic congestion impacts, and therefore exceed the 1.5 PCE. These and other variables should be quantified.</p>	Written comments

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory A. Traffic		
	<p>Response No. 18A: CEQR specifically defines waste collection vehicles as a light truck with a PCE of 1.5. Since waste collection vehicles are specifically called out as their own category in the 2001 CEQR Technical Manual, this is an appropriate PCE ratio. A PCE ratio of 2.0 is used for waste transfer trailers which are akin to 18-wheelers. A PCE ratio of 2.0 is the highest PCE ratio used in traffic analyses.</p>	
	<p>Comment No. 19A: In section 2.2.13.4, Traffic and Transportation Typical Mitigation Measures, what is meant by “acceptable levels,” especially as it relates to higher impacted environmental justice communities? The census tracts currently bearing the brunt of processing most of the City’s waste should not be further impacted because of high “relative cost of mitigation and the ease of implementation.”</p>	General
	<p>Response No. 19A: “Acceptable levels” are defined in the 2001 CEQR Technical Manual (page 30-28) for: (i) future no-action level of service (LOS) mid-D, E or F, mitigation back to the no-action condition is required; and (ii) for future no-action LOS A, B or C, mitigation to mid-LOS D is required. This standard is applied to all intersections in the City.</p>	
	<p>Comment No. 20A: Regarding the West 135th Street MTS, the draft scope indicates that during the peak hour, 30 truck trips are expected (45 PCE trips), not including employee trips. CEQR indicates that projects exceeding 50 trips require a detailed traffic study. Given the sensitive surrounding land use and complicated traffic issues related to Columbia’s planned development, a detailed traffic study should be performed, regardless of CEQR thresholds.</p>	West 135 th Street
	<p>Response No. 20A: Off-site traffic analyses of all Converted MTS sites will be performed in accordance with CEQR procedures.</p>	
	<p>Comment No. 21A: The current “interim plan” of trucking Manhattan’s waste to the WTE facility in Newark did not undergo a full environmental assessment when implemented. As an alternative to the Proposed Action, it needs to be thoroughly evaluated, including calculations of vehicle miles traveled (VMT) and their relative impacts on air quality and congestion. Traffic analysis points should be included, including key points in Northern Manhattan that receive GWB-bound DSNY trucks.</p>	Written comments
	<p>Response No. 21A: Direct delivery of DSNY-managed Waste in collection vehicles to the Essex County Resource Recovery Facility was the subject of an environmental review with the filing of an Environmental Assessment Statement and a Negative Declaration. Litigation contesting the adequacy of the EAS was filed and the City’s position was upheld. The DEIS will report on an updated environmental review of this Alternative.</p>	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory A. Traffic		
	Comment No. 22A: DSNY should consider a “flyover” for vehicles to access the West 135 th Street MTS connecting West 135 th Street and Riverside Drive to the MTS via a dedicated bridge, going over both the Amtrak rail line and the Henry Hudson Parkway (a detailed description and illustrations provided).	West 135 th Street
	Response No. 22A: The traffic analysis being performed at this site does not support the need for a flyover.	
	Comment No. 23A: The 24-hour/day barge traffic will increase navigational hazards to New York Water Taxi vessels, Circle Line boats and private vessels, including jet skis and day fisherman.	East 91 st Street
	Response No. 23A: Meetings have been held with the Coast Guard and the Harbor Operations Steering Committee concerning barge operations in the vicinity of the East 91 st Street MTS. They believe that the facility will not increase navigational hazards to any existing users of the waterway.	
	Comment No. 24A: The SWMP should consider systems which limit the Vehicle Miles Traveled for waste collection and transport vehicles. For example it should consider a franchising system for commercial waste where carters pick up waste in specific neighborhoods to minimize unnecessary truck traffic generated when multiple carters serve the same neighborhood.	Written comment
	Response No. 24A: The Converted MTSs would serve the Community Districts in their general vicinity, as in the past, thereby limiting the Vehicle Miles Traveled for waste collection. The franchising of commercial waste collection is under consideration by the administration and may be addressed in the New SWMP.	
	Comment No. 25A: The traffic to and from the facility on access to the planned boat trailer ramp into the Hudson River in Riverside Park South should be examined.	West 59 th Street
	Response No. 25A: All proposed developments in the study area that are scheduled for completion in or by Build Year 2006 will be considered in the DEIS analyses.	
	Comment No. 26A: The EIS should analyze traffic impacts at the intersections of Riverside Boulevard (not built but mapped) and West 59 th Street. Riverside Boulevard southbound intersects with West 59 th Street east of the Route 9A southbound service road, requiring southbound traffic to turn right on West 59 th Street, then immediate left onto the southbound service road, which may result in adverse impacts.	West 59 th Street
	Response No. 26A: The traffic analysis in the MTS Environmental Evaluation considered these intersections. All routes to and from the West 59 th Street Converted MTS screened out of traffic analysis because the peak hour trip generation, 28 DSNY collection vehicle trips (42 PCEs), was below CEQR screening thresholds that trigger the need for additional traffic analysis. As a further check on the screening analysis, an additional traffic analysis was performed at West 59 th Street and 12 th Avenue (the worst-case intersection at which traffic to and from the MTS would converge) to confirm that there would be no traffic impact from the Converted MTS.	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory B. Air Quality		
	Comment No. 1B: The air impacts should be examined in conjunction with the impacts from other facilities, especially for PM _{2.5} .	General
	Response No. 1B: The DEIS will evaluate potential air quality impacts from the project, combined with the background data from the nearest receptor and compared to the National Ambient Air Quality Standard (NAAQS). In the case of PM _{2.5} , there is no appropriate background established for the City, so interim Significant Threshold Values (STVs) established by NYCDEP will be used to determine whether the project impact is significant. The air quality analysis for facility emissions will evaluate and predict the potential for compliance with NAAQS at the project property line and beyond, except for PM _{2.5} , where compliance of several STV values are evaluated, including a neighborhood average. DEIS Section 3.0 will present a complete description of the air quality methodology used. Because other substantial sources of pollutants (those with a heat input of 2.8 MMBtu/hr or more) are relatively far away from the project when compared to the distance from the project to the nearest monitoring station, the background concentrations are considered to be representative of the existing ambient air quality (including impacts of other sources in the general area) in the vicinities of the project sites.	
	Comment No. 2B: The existing air quality should be tested and monitored.	General
	Response No. 2B: The NYSDEC has local air quality monitoring stations throughout the City that are used to obtain data for the comparison of local air quality with NAAQS. Based on these data, the City complies with NAAQS for the following pollutants: CO, NO _x and SO ₂ . NAAQS for PM ₁₀ are being met in all boroughs except for Manhattan. The collection and compilation of background data for PM _{2.5} levels over three years is in the process of being completed, and USEPA will publish compliance status with respect to PM _{2.5} in the future.	
	Comment No. 3B: The impacts analyses for the South Bronx MTS should include an analysis of its impact on the Fulton Fish Market, adjacent to the site.	South Bronx
	Response No. 3B: See Response No. 1B and Response No. 7A in the traffic section.	
	Comment No. 4B: The emissions from the tugboats should be examined in the EIS.	General
	Response No. 4B: Emissions from tugboats will be accounted for in the on-site air quality analyses reported in the DEIS.	
	Comment No. 5B: The air contamination from all of the truck traffic should be examined in the EIS. No reference is made to DSNY truck emissions as a function of fuels used. The impacts of various fuels including conversion of DSNY trucks to natural gas, hydrogen or hybrid vehicles should be added.	General

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory B. Air Quality		
<p>Response No. 5B: Off-site or mobile air quality analyses will evaluate the potential impacts of collection vehicle emissions traveling to and from the MTSs at intersections where trucks converge at sidewalk receptors. DSNY has conducted extensive pilots and studies of the use of alternative fuels and emission control technologies, as reported in the 2004 Commercial Waste Management Study. Currently, DSNY is using Low-Sulfur Fuel in all of its collection vehicles. Vehicles in Manhattan and the Bronx utilize Ultra-Low-Sulfur Fuel. The results of these pilots and studies will also be provided in the New SWMP.</p>		
<p>Comment No. 6B: What are the locations for air sampling?</p>		General
<p>Response No. 6B: In accordance with CEQR procedures, on-site emissions are evaluated by USEPA- and NYCDEP-approved air quality models that predict the level of emissions of criteria pollutants within a receptor grid that overlays the facility and measures compliance at the property boundary. The potential impacts of off-site or mobile emissions are predicted at sidewalk receptors using USEPA- and NYCDEP-approved air quality models.</p>		
<p>Comment No. 7B: Will the specific fuels utilized by on-site equipment be analyzed in the EIS?</p>		General
<p>Response No. 7B: The on-site mobile or processing equipment will predominantly use diesel fuel. By mid-2006, U.S. refineries will need to produce on-road diesel fuel with a sulfur content of no greater than 15 parts per million (ppm), referred to as ultra-low-sulfur fuel (ULSF). It was assumed for the air quality analysis that the DSNY collection vehicles would use ULSF, since that fuel will be introduced to the market as the Converted MTS facilities would be starting operations. It was also assumed for the air quality analysis that on-site equipment would use ULSF. Because this fuel will be widely available by the time facility operations begin, DSNY will require its use at all of the Converted MTS facilities.</p>		
<p>Comment No. 8B: Examine the impacts of the DSNY fleet of vehicles utilizing low sulfur fuels.</p>		General
<p>Response No. 8B: See Response No. 7B above.</p>		
<p>Comment No. 9B: The Commercial Waste Management Study showed increased levels of particulate matter of 10% to 50%. Why is this considered insignificant?</p>		Written Comment

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory B. Air Quality		
<p>Response No. 9B: The Commercial Waste Management Study (CWMS) in the Volume I Report on Four Study Areas with Transfer Stations in Geographical Proximity does not evaluate increased levels of any pollutants, but rather, evaluates what portion of the existing pollutant levels might be contributed by the existing Transfer Stations. The CWMS estimated that the PM_{2.5} contribution of 43 Transfer Stations distributed among these four geographical areas constituted between 0% and 6% of total PM_{2.5} emissions, as measured at the nearest background monitor in each Study Area. Existing annual background PM_{2.5} concentrations in the study areas are close to exceeding the NAAQS, and if the USEPA determines (late this year) that these areas do not meet the annual average PM_{2.5} NAAQS, it would be useful to know whether better controls on these facilities could help alleviate any PM_{2.5} problems. Given these levels of Transfer Station annual PM_{2.5} contributions, the Transfer Stations were not considered to be a major contributor to PM_{2.5} on an annual average basis.</p> <p>On a worst-case 24-hour average basis, Transfer Stations were predicted to contribute between 12% and 29% of the existing 24-hour average PM_{2.5} concentrations (refer to Table 5.5.5-6 of Volume I of the CWMS). However, because existing 24-hour PM_{2.5} concentrations in the Study Areas are well below the 24-hour average NAAQS (based upon data from the nearest monitoring sites), it is not expected that Transfer Stations would need to be better controlled on a 24-hour basis as part of a PM_{2.5} NAAQS attainment strategy.</p>		
Comment No. 10B: The EIS should examine the impacts of increased barge traffic, both existing and future.		General
Response No. 10B: The tug emissions associated with the switching of full and empty barges at the Converted MTSs and the 52 nd Street Barge Staging Area are accounted for in the air quality analyses as a source of on-site emissions. The DEIS will evaluate these sources relative to compliance with all applicable air quality standards.		
Comment No. 11B: The draft scope indicates that the CO screening threshold is lower for midtown than for Northern Manhattan. Given the concentration of heavy duty vehicle facilities in West Harlem, the CO threshold for the 135 th Street MTS evaluation should be as high as for any part of Manhattan.		West 135 th Street

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory B. Air Quality		
	<i>Response No. 11B:</i> The screening thresholds are established in the CEQR 2001 Technical Manual.	
	<i>Comment No. 12B:</i> The evaluation of impacts should include an assessment of dioxins emitted from diesel trucks, tugs, material-handling equipment and the Newark WTE facility.	Written Comment
	<i>Response No. 12B:</i> Several hazardous air pollutants (HAPs) were evaluated in the air quality study for this EIS. These included those pollutants for which the NYSDEC has established maximum exposure guidelines and for which the USEPA has developed emission factors to estimate emission rates. The USEPA has not yet published emission factors for dioxins, given a lack of data, and therefore, dioxins were not assessed. For the HAPs that were assessed in this study, the impact analysis demonstrates that the combined effects of these pollutants, including several potential carcinogens, would be below NYSDEC screening levels. Each assessment of on-site impacts is done on a local, project-level basis, due to the fact that the maximum impact areas are very localized, just beyond facility property lines. Therefore, any impacts from the Newark (Essex County) WTE facility would be assessed during permitting and/or environmental review of that facility by New Jersey agencies.	
Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory C. Noise		
	<i>Comment No. 1C:</i> The EIS should examine the impacts of noise on sensitive receptors, including individuals in adjacent parks, etc.	General
	<i>Response No. 1C:</i> The DEIS will evaluate facility-generated noise levels and off-site traffic-generated noise levels on sensitive receptors such as residences, parks, schools, churches, etc., (including those that are non-conforming) in proximity to the facilities and along local access roads for the facilities.	
	<i>Comment No. 2C:</i> The EIS should examine the impacts of all equipment at the MTS.	General
	<i>Response No. 2C:</i> The impacts of equipment used at the Converted MTSs (including tugboat operations) will be accounted for, as appropriate, in the noise and air quality impact analyses and will be reported in the DEIS.	
	<i>Comment No. 3C:</i> Noise impacts from tug operations should be examined.	General
	<i>Response No. 3C:</i> See Response No. 2C.	
	<i>Comment No. 4C:</i> The noise from trucks ascending and descending the ramps at the MTS should be examined, especially in the nighttime.	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory C. Noise		
	<i>Response No. 4C:</i> Noise from trucks on the ramps at the Converted MTSs is included in the on-site noise analysis for comparison to CEQR thresholds.	
	<i>Comment No. 5C:</i> The scope should include the compatibility with the City's newly proposed Noise Code.	General
	<i>Response No. 5C:</i> The DEIS will evaluate potential noise impacts as required by CEQR and applicable laws and regulations.	
	<i>Comment No. 6C:</i> An analysis of truck noise levels for diesel versus natural gas trucks would be a valuable addition to the EIS.	General
	<i>Response No. 6C:</i> The DEIS will evaluate the potential for truck noise impacts, based on DSNY's current collection fleet, from mobile (traveling to the facility) and stationary (at the facility) trucks.	
	<i>Comment No. 7C:</i> Noise impacts should be assessed for both the Existing Condition with the elevated Miller Highway in place, and with the relocated Miller Highway.	West 59 th Street
	<i>Response No. 7C:</i> The Build Year for the DEIS is 2006, and planned developments, provided by NYCDCP, will be included in the analysis. Since the relocated Miller Highway is not scheduled to begin operation in or by 2006, the analysis will not include the relocation.	
Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory D. Odor		
	<i>Comment No. 1D:</i> The EIS should examine the cumulative odor impacts from the MTSs in conjunction with other odor-producing facilities.	West 135 th Street, South Bronx
	<i>Response No. 1D:</i> The MTSs are designed with: (i) a ventilation system that will maintain negative air pressure in the building even when the doors are open; and (ii) an odor treatment system that neutralizes odors in ventilation air, as it is exhausted from the building. The DEIS will report the results of air dispersion modeling in combination with odor panel evaluations that assessed potential impacts by determining whether odors are detectable at sensitive receptors in the vicinity of the facility and at the property boundary. This methodology will be described in detail in DEIS Section 3.0. The odors from solid waste have different constituents that require different measurement methodologies than the measurement of odors from other industrial processes, such as sewage treatment facilities.	
	<i>Comment No. 2D:</i> The seasonal impacts of odors should be examined in the EIS.	General

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory D. Odor		
	Response No. 2D: The odor sampling and analysis that will be used in the modeling was conducted in the summer months to conservatively use the expected highest levels in the model. The air dispersion modeling referenced in Response No. 1D above is based on five years' worth of historical meteorological data (over 8,760 hours each year) to identify any time periods when odors would be detectable.	
	Comment No. 3D: Will the empty containers be cleaned before being shipped back to the MTS, and will they be checked for other hazards?	General
	Response No. 3D: Yes. The companies that DSNY contracts with for transport and disposal will be responsible for cleaning containers, as necessary, at the disposal facility destination.	
	Comment No. 4D: The impact of odors on the school on Metropolitan Avenue should be examined.	Greenpoint
	Response No. 4D: To the extent these odors might be attributable to a Converted MTS or an Alternative, they will be. To the extent they are attributable to trucks, it is important to note that the containers to be used for barge and rail export will be sealed and leakproof. The use of open-top transfer trailers will not be part of this program.	
	Comment No. 5D: The EIS should address the issue of storage space for garbage at peak capacity and contingency plans for maintaining odor control in the event of a power failure.	General
	Response No. 5D: The MTSs are designed to process arriving collection vehicles at the peak rate of 30 per hour. Additionally, seven of the eight Converted MTSs have on-floor storage capacity in excess of 700 tons. The MTSs are designed with small backup generators to ensure that the buildings' basic systems, including its lighting and odor control system, can operate in the event of an electric outage. The emergency generator load requirements will include the odor control system.	
Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory E. Vectors		
	Comment No. 1E: The EIS should examine the impacts of increased fly and vermin populations resulting from the MTSs on the surrounding communities.	General
	Response No. 1E: Vector and pest control for the MTSs will be handled by exterminators on a routine basis. The control program requires application of spray and the placement of traps throughout refuse handling operations, tipping floor and administrative areas. Should additional emergency service be needed, exterminators will be called in to handle emergency vector and pest control.	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory E. Vectors		
	<i>Comment No. 2E:</i> There are many rats on the railroad tracks near the Review Avenue facility.	Greenpoint (Queens)
	<i>Response No. 2E:</i> DSNY's putrescible Transfer Stations are inspected, on average, on a weekly basis by its Permit and Inspection Unit for, among other things, vermin infestation. DSNY's Transfer Station Operating Rules require putrescible Transfer Station operators to use licensed pest control companies to conduct a vermin control program on a weekly basis. The required measures are used at the Review Avenue facility.	
Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory F. Marine Ecology Impacts		
	<i>Comment No. 1F:</i> The EIS should examine the impacts to wetlands.	
	<i>Response No. 1F:</i> Beginning in January of 2003, DSNY's marine ecology consultant conducted a one-year evaluation of the marine habitat at the Converted MTS sites. This program has involved quarterly sampling of fish and benthic habitat. The results of this study will be reported in the DEIS. Both the United State Army Corps of Engineers (USACE) and the New York State Department of Environmental Conservation (NYSDEC) are responsible for issuing Section 10/404 permits and Article 15/25 permits, respectively, which will be required for construction of the Converted MTSs. These permits require the respective agencies to consider the impact of construction and operation of the Converted MTSs on marine life and wetlands.	
	<i>Comment No. 2F:</i> The EIS should examine the effects of shadowing on marine ecology. Aquatic species to be studied should include the endangered shortnose sturgeon.	West 59 th Street
	<i>Response No. 2F:</i> This issue will be considered in the study referenced in Response No. 1F above.	
	<i>Comment No. 3F:</i> A biological assessment of Newtown Creek should be performed.	Greenpoint
	<i>Response No. 3F:</i> Refer to Response No. 1F.	
	<i>Comment No. 4F:</i> The habitats in Coney Island Creek should be examined.	Southwest Brooklyn
	<i>Response No. 4F:</i> Coney Island Creek is a small highly stressed system approximately 1.3 miles from the Southwest Brooklyn MTS. Impacts from the MTS would not be measurable.	
	<i>Comment No. 5F:</i> The MTS effects on water quality in the Hudson River should be examined.	West 59 th Street
	<i>Response No. 5F:</i> The potential impacts of any discharges into surface waters will evaluated in the DEIS using standard water quality models.	
	<i>Comment No. 6F:</i> Regarding section 2.2.12.3, Sanitary Sewers and Stormwater, there is concern with the limits of testing at WPCPs, especially the one adjacent to the Greenpoint MTS. Testing should be done during heavy rains and high-volume usage when the WPCPs are under stress and stormwater runoff is highest.	Greenpoint

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory F. Marine Ecology Impacts		
	Response No. 6F: No additional testing at the water pollution control plants (WPCP) is anticipated as part of the DEIS. No significant increase in combined sewer overflows would be expected as a result of the Proposed Action due to the anticipated wastewater and stormwater flows that would be generated. The DEIS will, however, estimate the sanitary, process and stormwater flows that would be generated as part of the operation of the Converted MTS. The most currently available WPCP data would be used to estimate flows for the most recent 12-month period. An assessment of the potential contribution from the new facility in comparison to existing flows would be made to determine if potential adverse impacts will occur.	Greenpoint
	Comment No. 7F: The EIS should assess impacts to the Waterfront Revitalization Program policy and propose mitigation measures.	
	Response No. 7F: The DEIS will assess the potential for impacts to the Waterfront Revitalization Program in accordance with CEQR.	
Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory G. Existing Conditions Don't Account for Recent New Development		
	Comment No. 1G: The EIS should examine the impacts to the Con Ed site which will be converted to public use (West 59 th Street), or the Helena (between West 57 th and West 58 th Streets and 11 th and 12 th Avenues) to be opened in 2005, and to newly developed waterfront uses.	West 59 th Street
	Response No. 1G: A list of proposed projects and proposed zoning changes scheduled to be in place by the 2006 project Build Year will be compiled (based on consultation with NYCDCP) and analyzed in the DEIS.	
	Comment No. 2G: The EIS should examine the rezoning of West 57 th Street.	West 59 th Street
	Response No. 2G: Refer to Response No. 1G.	
	Comment No. 3G: The neighborhood in the vicinity of the East 91 st Street MTS has changed since the MTS was last operational, making the site no longer suitable.	East 91 st Street
	Response No. 3G: The DEIS will present an environmental review conducted in accordance with CEQR procedures that considers both existing conditions and projected Build Year conditions in evaluating the potential impacts associated with the Proposed Action.	
	Comment No. 4G: New zoning in the vicinity of the MTSs should be examined, e.g., the East 91 st Street MTS is in an M1-1 zone, not an M2-2, as stated in the Draft Scope.	East 91 st Street
	Response No. 4G: The East 91 st Street site is in an M1-4 zone. A list of proposed projects and proposed zoning changes scheduled to be in place by the 2006 project Build Year will be compiled, based on consultation with NYCDCP, and analyzed in the EIS.	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory G. Existing Conditions Don't Account for Recent New Development		
	Comment No. 5G: Waterfront issues should be addressed in the EIS, specifically the impacts of the MTSs on Pier 99, Hudson River Park, its bikeways and walkways, the future use of Pier 97 and Pier 94.	West 59 th Street
	Response No. 5G: From a traffic viewpoint, a similar hazard exists today. Currently, inbound trucks delivering paper to the facility cross the bike path and walkway. However, this location is not reported as a high accident location as defined by CEQR, which indicates that the occurrence of accidents at this site involving pedestrians or bikers is low. The DEIS will apply CEQR impact analysis methodologies as appropriate to this location.	
	Comment No. 6G: Impacts to the marina, adjacent to the Southwest Brooklyn facility, specifically due to increased wake, and impacts to the Nelly Bly amusement park, should be examined.	Southwest Brooklyn
	Response No. 6G: A kingpile bulkhead wall will be built to ensure that the marina is not impacted by dredging operations or wake resulting from barge towing operations. The DEIS will evaluate these potential impacts, taking onto account the addition of the kingpile bulkhead. Nelly Bly has been included in the Final Scoping Document Southwest Brooklyn MTS site description and will also be included in the DEIS Southwest Brooklyn site description.	
	Comment No. 7G: How will the MTS affect the renovation of the passenger ship terminals?	West 59 th Street
	Response No. 7G: The Passenger Ship Terminal is located on Piers 88, 90 and 92 (located at the end of West 48 th , West 50 th and West 52 nd Streets). The northernmost terminal pier is within the ½-mile study area of the West 59 th Street Converted MTS. Proposed improvements (site circulation, signage, etc.) would be discussed in the DEIS. Pier 94 (at West 54 th Street) is used for trade shows.	
	Comment No. 8G: The College Point Industrial Park (west of Whitestone Expressway, north of Linden) is now a large retail area which should be accounted for.	North Shore
	Response No. 8G: The traffic effects of the Industrial Park will be accounted for in the DEIS discussion of Existing Conditions. No mitigation was required in this area of College Point. Very little project traffic is routed past this retail area.	
	Comment No. 9G: The rezoning of the Greenpoint/Williamsburg waterfront will create over 8,000 housing units, which should be taken into account in the DEIS.	Greenpoint
	Response No. 9G: The rezoning will be discussed in the DEIS, though only a small portion of the rezoned area is within our ½-mile study area – three blocks that will allow mixed industrial/residential uses.	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory G. Existing Conditions Don't Account for Recent New Development		
	Comment No. 10G: The EIS should take into consideration traffic changes that the NYCEDC and Columbia have proposed for the area near the West 135 th Street MTS. These include three street direction changes (West 133 rd Street, one-way westbound west of Broadway; West 132 nd Street, one-way eastbound west of Broadway; and West 125 th Street, one-way westbound between Marginal and 12 th Avenue); three new traffic signals (St. Clair Place at 12 th Avenue, West 125 th Street at West 129 th Street, and Marginal at West 132 nd Street); signal timing modifications; and Henry Hudson Parkway northbound on-ramp relocation to West 134 th Street west of 12 th Avenue.	West 135 th Street.
	Response No. 10G: In defining the Future No-Build Conditions, the DEIS will take into consideration proposed developments that are slated to be in place by 2006 in the study area.	
	Comment No. 11G: Nowhere in the Scoping Document is Riverside Park Phase III, west of the Miller Highway from West 65 th to West 62 nd Streets, including all the land under water to the Pierhead Line, acknowledged. Nor is Hudson River Park, a critical estuarine sanctuary, mentioned. The large surface parking facility north of the West 59 th Street site is part of Riverside South, not a buffer. In addition, further east of the site is becoming more residential, and an apartment tower is being built at West 59 th Street and West End Avenue, which resulted in a rezoning from M1-6 to C4-7.	West 59 th Street
	Response No. 11G: The Scoping Document has been revised to reflect ongoing construction and changes to the surrounding study area. The DEIS will characterize current conditions and consider projects proposed for completion by 2006 in the Future No-Build Condition.	
	Comment No. 12G: Other changes to Section 2.2.1 of the Scoping Document, including the rezoning of a M1-6 zone to C4-7 to allow the Cambridge residential development, the Board of Standards and Appeals variance granted to Touro College for its planned facility and residence at 227 West 60 th Street, and the pending ULURP action by John Jay College for its new expansion, should be considered.	
	Response No. 12G: Refer to Response No. 11G.	
Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory H. Historical/Archeological		
	Comment No. 1H: Many historical sites were not noted in the Scoping Document, including Gracie Mansion.	
	Response No. 1H: The site description will be corrected in the Final Scoping Document. Detailed site descriptions will be provided in the DEIS.	
	Comment No. 2H: The EIS should examine impacts to historical and archaeological sites.	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory H. Historical/Archeological		
	<i>Response No. 2H:</i> The DEIS will assess potential cultural resource impacts in each Converted MTS study area.	
	<i>Comment No. 3H:</i> Under cultural resources, the EIS should consider visual and other impacts of truck traffic on the New York City landmark power station, directly across 12 th Avenue from the proposed West 59 th Street MTS.	
	<i>Response No. 3H:</i> The DEIS will address visual and traffic impacts of the Converted MTSs to cultural resources in the study area, based upon consultation with SHPO and LPC.	
Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory I. Socioeconomics		
	<i>Comment No. 1I:</i> The EIS should examine the economic impacts that the MTS will have on the property values of the surrounding neighborhoods.	
	<i>Response No. 1I:</i> The existing MTSs operated for approximately 40 to 50 years; too many variables affect property values to accurately correlate property values and proximity to a Converted MTS.	
	<i>Comment No. 2I:</i> Operational costs for the MTSs should be provided.	
	<i>Response No. 2I:</i> The New SWMP will present an economic analysis of the Proposed Long Term Export Program, including the costs for waste transfer, transportation and disposal.	
	<i>Comment No. 3I:</i> The total cost per ton processed should be provided for all Alternatives.	
	<i>Response No. 3I:</i> The Draft New SWMP will present the aggregate annual cost of the Proposed Action.	
Category	Siting Issues	Source of Comment
Subcategory J. Fair Share		
	<i>Comment No. 1J:</i> Each borough should take its proportionate share of waste, and it should be made clear to which facility the waste from each borough will be going.	General
	<i>Response No. 1J:</i> The Proposed Action will (with minor exceptions) assign Community Districts to the same MTS wasteshed as were historically assigned. If Alternatives to the Proposed Action are selected, the wastesheds serving these Alternatives will be clearly defined.	
	<i>Comment No. 2J:</i> If MTSs are not built at certain sites, such as in Manhattan, there is concern that the ones that are built will get all of the City's waste.	General
	<i>Response No. 2J:</i> The administration is committed to a balanced distribution of waste handling facilities among all of the City's boroughs.	

Category	Siting Issues	Source of Comment
Subcategory J. Fair Share		
Comment No. 3J: Is the secondary wasteshed for a given facility the entire City?		Southwest Brooklyn
Response No. 3J: In the event of emergency shutdowns, road closures, severe weather and similar such events, a wasteshed normally assigned to one Converted MTS may be shifted to another on a temporary basis. These measures are short term and are essential to provide a level of redundancy and reliability that is necessary to ensure that waste can be safely disposed of in emergencies. These types of shifts would occur among MTSs that are located in proximity to each other. A single Converted MTS would not operate as a secondary wasteshed for the entire City.		
Comment No. 4J: The Draft Scope fails to address the environmental justice impacts of the SWMP.		Written Comment
Response No. 4J: The Draft Scope describes the process, voluntarily adopted but developed in consultation with NYSDEC and based upon its Environmental Justice Guidance, that is being followed to provide enhanced opportunities for meaningful comment and to involve affected communities in the environmental review process and permitting for the New SWMP.		
Comment No. 5J: The Draft Scoping Document should evaluate not just new impacts from the MTS but whether an additional new layer of impact resulting from the Proposed Action combined with the existing ones results in an EJ community's having a disproportionate share of impacts.		Written Comment
Response No. 5J: See Response No. 4J above.		
Comment No. 6J: Assuming comparable waste generation rates across the City, and using 2000 population data, it appears that West 135 th Street is handling a disproportionately large amount of waste compared to other Manhattan MTSs under consideration. Therefore DSNY should re-examine planned tonnage allocations.		West 135 th Street
Response No. 6J: The average peak day waste (i.e., the average of Tuesday over 52 weeks) generation associated with the MTS wastesheds is based on historical waste generation rates. Note that the DEIS will apply a contingency factor to the average peak day to build a margin of conservatism into the analysis.		

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory K. Parklands		
	Comment No. 1K: The ramp to the East 91 st Street MTS bisects Asphalt Green, making it an inappropriate site.	East 91 st Street
	Response No. 1K: The DEIS will evaluate the potential odor and noise impacts associated with using the existing ramp that crosses Asphalt Green Park to reach the East 91 st Street MTS.	
	Comment No. 2K: Why were some, but not other, Manhattan sites eliminated based upon their proximity to parklands?	East 91 st Street
	Response No. 2K: The City's Long Term Export Program is predicated on export of containerized waste by barge or rail as a means of reducing outbound waste vehicle traffic. DSNY is seeking proposals from private transfer stations in three boroughs. Manhattan has no private transfer stations that could meet this criterion and possibly serve as Alternatives to one or more Converted MTSs. The CWM Study evaluated four sites in Manhattan. West 140 th Street site was determined to be infeasible for technical reasons, primarily relating to its insufficient size. The Pier 42 site had significant technical disadvantages relating to its small size and its prohibitions against using the site as a transfer station. The West 30 th Street site is also limited by its size, and the West 13 th Street site also had substantial land use and legislative constraints to development as a transfer station site. (Refer to the CWM Study for details.) None of these sites were precluded based solely on proximity to parklands. The existing MTSs functioned for approximately 50 years as facilities that transported waste to Fresh Kills for disposal in an efficient and environmentally sound manner. With the permanent closure of Fresh Kills, these same sites can be used to containerize and export waste in the same efficient and environmentally sound manner. Parklands and other amenities have developed around several original MTS sites. The DEIS will evaluate the potential impacts associated with reactivation of these sites.	
	Comment No. 3K: The shadow from the MTS will impair vision on the fields at Asphalt Green.	East 91 st Street
	Response No. 3K: Shadow analyses will be conducted as per CEQR guidelines, and the DEIS will disclose any potential impacts on sensitive uses such as parks, e.g., Asphalt Green.	
	Comment No. 4K: DSNY's Siting Rules conflict with the location of the East 91 st Street MTS proximate to parklands and residentially-zoned areas (Asphalt Green, Carl Schurz Park).	East 91 st Street
	Response No. 4K: See Response No. 2K above.	
	Comment No. 5K: How will the MTS impact the Clinton Cove section of Hudson River Park, and the future use of Pier 97?	West 59 th Street

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory K. Parklands		
	<i>Response No. 5K:</i> The impacts will be determined through consultation with the NYCDPR and NYCDCP as part of developing the DEIS. According to the Hudson River Park, Pier 97 (DSNY storage pier) will be redeveloped as a part of Clinton Cove Park (Piers 95 and 96 are now under construction).	
	<i>Comment No. 6K:</i> The EIS should examine impacts to Dewitt Clinton Park at West 55 th Street and the West 59 th Street Recreation Center.	West 59 th Street
	<i>Response No. 6K:</i> Potential project impacts on DeWitt Clinton Park (located between West 52 nd and West 54 th Streets, between 11 th and 12 th Avenues), as well as other parks in the study area, will be evaluated in the DEIS, through consultation with NYCDPR.	
	<i>Comment No. 7K:</i> The SWMP must be consistent with the New York City Comprehensive Waterfront Plan, which identifies six industrial areas where the MTSs would be more suitable.	East 91 st Street
	<i>Response No. 7K:</i> The DEIS will specifically address the consistency of the Proposed Action with the City's Waterfront Revitalization Plan.	
Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory L. Alternative Sites		
	<i>Comment No. 1L:</i> Alternative sites should be examined, not just sites where existing MTSs are located; specifically, examine sites below 59 th Street in Manhattan, including near the World Trade Center Site.	West 135 th Street
	<i>Response No. 1L:</i> DSNY has investigated four M-zoned sites in Manhattan. See the CWM Study Volume V, Manhattan Transfer Station Siting Report, as well as the response to Comment No. 2K provided above.	
	<i>Comment No. 2L:</i> Alternative sites in Manhattan should be examined, which are over 400 feet from parks, schools and residences.	East 91 st Street
	<i>Response No. 2L:</i> See Response Nos. 1L and 2K provided above.	
	<i>Comment No. 3L:</i> Additional sites along the shoreline in the Bronx should be examined as an alternative to the South Bronx MTS site.	South Bronx
	<i>Response No. 3L:</i> The Bronx currently has 7,000 tpd of permitted private Transfer Station capacity sited along its shore line.	
	<i>Comment No. 4L:</i> New sites should be looked at as alternatives.	General
	<i>Response No. 4L:</i> In addition to the study referenced in Response No. 1L above, DSNY is seeking Alternative proposals as discussed in Response No. 2K in the Parklands section.	

Category	Proposed DEIS Impact Analyses	Source of Comment
Subcategory L. Alternative Sites		
	<i>Comment No. 5L:</i> The East 91 st Street MTS is sited in a floodplain.	East 91 st Street
	<i>Response No. 5L:</i> The elevation of the pier level of the Converted MTS is set six inches above the 100-year flood elevation.	
	<i>Comment No. 6L:</i> The Manhattan SWAB has identified additional sites in Manhattan which should be examined as alternatives.	West 59 th Street.
	<i>Response No. 6L:</i> See Response No. 1L above	
	<i>Comment No. 7L:</i> The EIS should examine the possibility of exporting waste from a truck-to-rail transfer facility along the Amtrak ROW just east of Eleventh Avenue between West 36 th and West 38 th Streets in Manhattan, as well as other locations in the West 50s.	Written Comment
	<i>Response No. 7L:</i> The only railyard in this vicinity is the Long Island Railroad's Hudson Yard, which is located between 11 th and 12 th Avenues and West 30 th and West 36 th Streets. This facility is part of the No. 7 Subway Extension-Hudson Yards Rezoning Development program, including a multi-use stadium that is proposed to be built above it. The planned land uses in this area are not consistent with development of a truck-to-rail transfer station.	
	<i>Comment No. 8L:</i> The Bronx SWAB recommends that DSNY study the feasibility of converting its property at 850 Zerega Avenue, or acquiring another site along Westchester Creek within the Industrial Park, to house an MTS.	South Bronx, Port Morris
	<i>Response No. 8L:</i> DSNY already has a publicly owned site at its existing MTS location where a Converted MTS can be developed without causing significant impacts. Alternatively, the plan may propose to use private transfer stations in the Bronx for long-term export.	
Category	M. Public Health	Source of Comment
	<i>Comment No. 1M:</i> The hazardous constituency of New York City waste must be examined and taken into account in the SWMP.	General
	<i>Response No. 1M:</i> Exposure to hazardous air pollutants will be examined in the DEIS. In general, DSNY-managed Waste collection procedures screen for potential hazardous materials and all waste loads will be visually inspected during unloading at the Converted MTS or Alternative facility. In the event that any form of hazardous or potentially unacceptable waste is found, the Contingency Plan will be implemented. All trucks will be screened for radioactive wastes as well. Household hazardous wastes, according to the USEPA (40 CFR, Section 261.4(b)(1)), which include waste normally found in households, such as paint cans, batteries and cleaning fluids, are not considered to be hazardous wastes, and will not be deemed unacceptable if they are otherwise allowable under Applicable Law.	

Category	M. Public Health	Source of Comment
	Comment No. 2M: What are the health impacts from the waste sitting in a container for a few days?	
	Response No. 2M: To prevent the escape of leachate, containers are sealed and leakproof. Previous odor studies of containerized waste (see 2000 SWMP FEIS) over a one-week period during July have shown that odors from these containers have very low emission rates and would generally be undetectable within several feet of the container.	
	Comment No. 3M: The impacts of noxious liquids leaking from trucks should be addressed.	East 91 st Street
	Response No. 3M: The specifications that DSNY uses to purchase collection vehicles stipulate measures that are specifically designed to prevent leaking of liquids from the truck body. These, for example, include a fully welded heavy gauge steel construction and rubber gasket seal on the tail gate. Trucks are maintained over a seven-year period and then replaced, so that one-seventh of the fleet is replaced every year. Trucks are washed externally every two weeks and are given a full cleaning, inside and out, every 30 days.	
	Comment No. 4M: The impacts to public health from diesel fuel, vermin and other allergens should be examined.	General
	Response No. 4M: The DEIS will contain a discussion of public health impacts related to solid waste transfer.	
	Comment No. 5M: The impacts from dioxins in the soils at the sites of the former incinerators should be examined.	Greenpoint
	Response No. 5M: Soil sampling and testing at the three Converted MTS sites contiguous to closed incinerators will be conducted and reported in the DEIS. Hazardous substances identified will be managed and disposed of during construction in compliance with applicable regulations.	
	Comment No. 6M: The EIS should examine the impacts on asthma from the MTSs.	General
	Response No. 6M: See Response No. 4M above.	
	Comment No. 7M: The EIS should examine the impacts to children's health.	General
	Response No. 7M: Refer to Response No. 4M above.	
	Comment No. 8M: Data on carbon monoxide, particulate matter, sulfur dioxide, etc., should be provided by an independent authority.	East 91 st Street
	Response No. 8M: Ambient air data have been gathered by the NYSDEC using USEPA-approved methods. See Response No. 4M above.	
	Comment No. 9M: The impact of additional traffic on ambulances making timely calls should be addressed.	East 91 st Street
	Response No. 9M: Vehicles are required to yield to ambulances as a matter of law. This is not an issue that requires analysis in the DEIS.	
	Comment No. 10M: The public health consequences of facility collapse should be addressed.	East 91 st Street

Category	M. Public Health	Source of Comment
	<i>Response No. 10M:</i> A converted MTS is designed for a 50-year life. Periodic inspection and maintenance programs can extend that life indefinitely. DSNY is responsible for the safety of its workers at its facilities.	
	<i>Comment No. 11M:</i> The ventilation system of the loading floor will adversely affect the health of DSNY personnel.	
	<i>Response No. 11M:</i> The ventilation system is designed to achieve up to 12 air changes per hour, which exceeds the building code standard by a factor of 2. The odor neutralizing agent is introduced into the exhaust air as it leaves the building, thereby having no direct effect on the building's occupants. A water-based fine misting system for dust suppression within the building will be activated when dust levels are high. All of these design measures are protective of worker health.	
	<i>Comment No. 12M:</i> The EIS should present detailed plans for emergency response, including neighborhood evacuation plans, should chemicals, explosives, etc., pose a significant threat to residents.	East 91 st Street
	<i>Response No. 12M:</i> Such plans are detailed in the draft Part 360 permit which is available in local repositories for public comment.	
	<i>Comment No. 13M:</i> The health impacts of the existing burden from facilities other than the transfer stations should be considered for each community as the background load.	West 135 th Street, South Bronx, Greenpoint
	<i>Response No. 13M:</i> Existing levels of noise, traffic and air pollutants, from whatever source, are utilized to determine background levels.	
	<i>Comment No. 14M:</i> A health study on the bacteria from dewatered grit, particulate matter and deodorizers associated with transfer stations and their affect on asthma should be undertaken.	Greenpoint
	<i>Response No. 14M:</i> Dewatered grit is disposed of by NYCDEP at facilities other than DSNY Transfer Stations. The air quality analyses in the DEIS evaluate criteria pollutants in reference to NAAQS and PM _{2.5} in reference to interim Significant Threshold Values. The odor neutralizing agent would not be specifically evaluated. However, manufacturers of these compounds are required to report in public databases any components that are characterized as hazardous.	
Category	N. Inequitable Burdens	Source of Comment
	<i>Comment No. 1N:</i> An environmental justice analysis should be performed to examine alternatives that minimize environmental impacts to poorer areas.	South Bronx, Port Morris, West 135 th Street
	<i>Response No. 1N:</i> DSNY has an Environmental Justice program in place, developed on a voluntary basis in consultation with NYSDEC and conforming to NYSDEC's Environmental Justice Guidance. This plan has been followed in conducting enhanced public participation at all Proposed Action and Alternative project areas. The program will continue to be followed during the Public Hearings on the DEIS and Part 360 Permits.	

Category	N. Inequitable Burdens	Source of Comment
<i>Comment No. 2N:</i>	The area near the West 135 th Street MTS receives a disproportionate share of polluting facilities.	West 135 th Street
<i>Response No. 2N:</i>	DSNY will follow Uniform Land Use Review Procedures (ULURP) for Converted MTS site selection actions. The ULURP application includes a Fair Share analysis.	
<i>Comment No. 3N:</i>	The Williamsburg/Greenpoint area handles an inequitable share of the City's waste.	Greenpoint
<i>Response No.3N:</i>	The Proposed Action is designed to achieve an equitable distribution of export facilities among the boroughs.	
<i>Comment No. 4N:</i>	The EIS should study how borough self-sufficiency can be achieved for both residential and commercial waste, and should study implementation of an equity fund to benefit communities that handle commercial and residential waste coming from other boroughs.	Greenpoint
<i>Response No. 4N:</i>	See Response No. 3N. The issues of borough self-sufficiency for commercial waste and equity funds to benefit communities are not environmental review issues. They will be considered in the Draft New SWMP, as well as during the Draft New SWMP adoption process.	
Category	Commercial Waste	Source of Comment
Subcategory O. Traffic		
<i>Comment No. 10:</i>	The worst-case scenario should be examined for commercial truck deliveries of waste.	General
<i>Response No. 10:</i>	By evaluating noise impacts from nighttime deliveries of commercial waste to Converted MTSs in the CWM Study, Volume III, Commercial Waste Processing and Analysis of Potential Impacts, DSNY has taken into account worst-case conditions. This analysis will be incorporated into the DEIS. Also see Response Nos. 6A and No. 7A.	
<i>Comment No. 20:</i>	The impacts from the land-based private Transfer Stations should be examined in the same manner that the MTSs are being evaluated.	South Bronx, Greenpoint, Port Morris
<i>Response No. 20:</i>	Existing land-based Transfer Stations have permits to operate and are not subject to environmental review as a condition of continued operation. In accordance with Local Law 74 of 2000, DSNY completed a consultant study of the combined effects of private Transfer Stations in four Study Areas that have relative concentrations of these facilities. See Volume I of the CWM Study.	
<i>Comment No. 30:</i>	What is being done to incentivize the use of the public MTSs by the private haulers?	
<i>Response No. 30:</i>	That issue will be explored by DSNY and addressed in the Draft New SWMP adoption process.	
<i>Comment No. 40:</i>	The consolidation of private Transfer Stations should be examined.	South Bronx, Greenpoint

Category	Commercial Waste	Source of Comment
Subcategory O. Traffic		
Response No. 40: This issue is one that will be addressed in the Draft New SWMP and as part of the Draft New SWMP adoption process.		
Comment No. 50: The impact of noise from commercial trucks in the early morning should be examined.		Greenpoint
Response No. 50: Off-site noise impacts from potential commercial waste hauling vehicles delivering waste to the Converted MTSs were evaluated in the MTS Environmental Evaluation and will be analyzed in the DEIS. The NYCDEP and DSNY are in the process of revising the noise codes to, among other things, reduce the allowable levels of noise from waste hauling vehicles.		
Comment No. 60: Under DSNY’s existing regulatory authority, what actions to improve the operation of the private Transfer Stations can be implemented, and which cannot?		Written Comment
Response No. 60: To improve private solid waste Transfer Station operations, DSNY will propose amendments to its existing operating rules requiring owners and operators of private Transfer Stations to: (i) address air contaminant emissions produced by stationary equipment and non-road motor vehicles used at private solid waste transfer stations; (ii) install state-of-the-art odor control equipment at putrescible transfer stations; and (iii) enhance dust suppression measures at non-putrescible transfer stations by installing misting devices and employing tire washing procedures to prevent dirt and debris from being tracked to and from a facility into the public roadways. Under DSNY’s proposed Siting Rules, a new transfer station would be required to have sufficient space to accommodate the on-site queuing of trucks and, for the siting of new transfer stations, would impose strict buffer distance requirements regarding residential districts, hospitals, public parks, schools or other solid waste transfer stations.		
Comment No. 70: If an MTS is selected, and if commercial waste is also delivered to that facility, could local land-based facilities still remain open?		South Bronx
Response No. 70: See Response No. 30 above.		
Comment No. 80: A cumulative impact analysis should be undertaken, looking at the actual equipment used at the private facilities.		

Category	Commercial Waste	Source of Comment
Subcategory O. Traffic		
<p>Response No. 80: The 2004 Commercial Waste Management Study evaluated the combined, or aggregate, potential effects of multiple Transfer Stations in geographical proximity operating simultaneously. The analysis conservatively assumed that the private Transfer Stations were operating as allowed by permit, and was adjusted in some cases where the modeled noise levels were higher than those measured in the field with background noise. Prototypical designs were developed for eight categories of transfer stations based on available design information and field surveys (e.g., lot and building size, number and types of equipment, property boundary, site layout, etc.) for approximately 50% of the 36 Transfer Stations analyzed. For the air quality analyses, the average emissions for both older and newer equipment was utilized, even though it is likely that newer and hence cleaner equipment is actually utilized. Model results from the largest actual facility in each of the eight categories were compared to prototypical facilities, and results were the same order-of-magnitude.</p>		
<p>Comment No. 90: If land-based transfer stations are closed along with the opening of the MTSs, will those closed stations never be permitted to reopen at a later time?</p>		
<p>Response No. 90: This is an issue that will likely be addressed in the Draft New SWMP and as part of the Draft New SWMP adoption process.</p>		Greenpoint
Category	Recycling	Source of Comment
Subcategory P. Zero Waste Plan/Waste Minimization		
<p>Comment No. 1P: The EIS should examine innovative means of minimizing waste, including discouraging excess packaging and encouraging the greater use of garbage disposals.</p>		General
<p>Response No. 1P: The New SWMP will provide the status of DSNY's ongoing program for waste prevention, reuse and recycling, and discuss plans for New Initiatives.</p>		
<p>Comment No. 2P: The "Citizen's Plan for Zero Waste" should be adopted by the City, and incorporated into the SWMP.</p>		General
<p>Response No. 2P: See Response No. 1P above.</p>		
<p>Comment No. 3P: Recycling facilities should not be sited in areas where other polluting facilities are located.</p>		Port Morris
<p>Response No. 3P: Recycling facilities are industrial in nature and sited in M-zoned areas. DSNY is seeking to develop long-term processing arrangements with a network of waterfront facilities in several boroughs that would provide economies in delivery of Curbside Recyclables in the DSNY's collection vehicles and also in the bulk shipment of product by barge.</p>		

Category	Recycling	Source of Comment
Subcategory Q. Composting		
<i>Comment No. 1Q:</i> Composting should be examined as an alternative in the EIS.		General
<i>Response No. 1Q:</i> The New SWMP will address the status of the City’s composting program and new initiatives.		
<i>Comment No. 2Q:</i> The EIS should consider managing food wastes separately from other wastes.		Written Comment
<i>Response No. 2Q:</i> This is an issue that DSNY has studied extensively over the past several years and will be a matter addressed in the New SWMP.		
Category	Private Waste Management Company Practices	Source of Comment
Subcategory R. Worker Safety		
<i>Comment No. 1R:</i> Waste Management Inc. is discriminatory in their practices, paying their workers less in the Bronx than in Westchester County.		Port Morris
<i>Response No. 1R:</i> The City’s Vendex system is used to review the records of prospective contractors in terms of violations of law. Such a review will be conducted in the event that the City elects to enter into a long-term export contract with Waste Management.		
<i>Comment No. 2R:</i> Waste Management operates its facilities under unsafe conditions for its workers.		Port Morris
<i>Response No. 2R:</i> Worker safety is a serious matter that is the regulatory domain of the federal Occupational Health and Safety Administration (OSHA) and the New York State Department of Labor; violations should be referred to these agencies when they occur.		
Category	Recycling	Source of Comment
Subcategory S. Monopolistic Practices		
<i>Comment No. 1S:</i> Waste Management Inc. will become a monopoly in the City, since they control all the rail haul options.		Port Morris
<i>Response No. 1S:</i> Although Waste Management currently has exclusive use of rail facilities in the Harlem River Yard, it does not control the rail freight network in the City. CSX can serve rail customers in Oak Island Yard in the Bronx. Both CSX and CP can serve rail customers who have access to Fresh Pond Yard in Queens by obtaining shortline rail transport service from the New York and Atlantic Railroad, which has a franchise to provide freight service on the Long Island Rail Road. CSX and NS can serve customers at Howland Hook on Staten Island or at other intermodal freight rail terminals that are part of the Conrail Shared Asset System in New Jersey.		

Category	Recycling	Source of Comment
Subcategory S. Monopolistic Practices		
<i>Comment No. 2S:</i> Waste Management was found guilty of price fixing		Port Morris
<i>Response No. 2S:</i> See Response Nos. 1R and 2R provided in the Worker Safety section above.		
Category	Recycling	Source of Comment
Subcategory T. General		
<i>Comment No. 1T:</i> The problems associated with Waste Management's operation on Review Avenue and under the Kosciusko Bridge should be addressed.		Greenpoint - Queens
<i>Response No. 1T:</i> The DSNY currently uses these facilities under interim export arrangements. Its Permit and Inspection Unit also conducts periodic inspections to assure compliance with DSNY's Transfer Station Operating Rules.		
<i>Comment No. 2T:</i> The City should examine Waste Management's leasehold arrangement with the NYSDOT at Harlem River Yard.		Port Morris
<i>Response No. 2T:</i> As noted above, Waste Management's lease arrangements with the developer of the Harlem River Yard provide that no other waste vendor can use that facility for waste transfer operations.		
Category	U. Use of Alternative Technology	Source of Comment
<i>Comment No. 1U:</i> Gasification and biodigestion should be examined as an alternative to landfilling/incineration.		General
<i>Response No. 1U:</i> The private facility export procurements issued by DSNY allow for proposals by companies interested in developing waste processing facilities, such as these, out of the City.		
<i>Comment No. 2U:</i> A cost-benefit analysis should be undertaken for identified alternatives.		General
<i>Response No. 2U:</i> The Draft SWMP will include an economic analysis.		
<i>Comment No. 3U:</i> Waste-to-energy facilities should be considered as an alternative.		West 59 th Street
<i>Response No. 3U:</i> See Response No. 1U above.		
<i>Comment No. 4U:</i> The EIS should look at alternative collection issues such as potential automation, reduction and alteration of routes, vehicle reduction, vehicle emissions and providing vehicles with capabilities to better sort various types of waste.		Written Comment
<i>Response No. 4U:</i> These are operational matters that DSNY addresses as an ongoing process of seeking productivity improvements in its collection operations and are not an appropriate subject for review in the DEIS.		

Category	V. Other	Source of Comment
	<i>Comment No. 1V:</i> Where has one of these MTSs been built, and is it proven technology?	
	<i>Response No. 1V:</i> An exact duplicate of a Converted MTS has not been built, primarily because New York is the only city in the country that has a history of relying on water-borne transport of solid waste. However, the components of the Converted MTSs (use of special intermodal containers, through-the-floor loading of these containers, shuttle cars and gantry cranes) have all been proven in similar applications elsewhere.	
	<i>Comment No. 2V:</i> Means of enforcing existing regulations concerning truck routes and idling, etc., should be examined.	
	<i>Response No. 2V:</i> Volume I of the Commercial Waste Management Study: Private Transfer Station Evaluations, studied the effectiveness of enforcement of regulations by the City and New York State on the private Transfer Stations. This will be addressed in the New SWMP. It should also be noted that the Converted MTSs will be designed so that there will be no off-site queuing or idling of waste collection vehicles.	
	<i>Comment No. 3V:</i> How will waste be handled if tug operations cease for a period of time?	General
	<i>Response No. 3V:</i> The Draft Part 360 permit contains an emergency response plan that addresses temporary disruption of service at one or more Converted MTSs due to factors such as weather events.	
	<i>Comment No. 4V:</i> Why are the MTSs sized so much larger than the historical amount of waste received? Why are they being over-designed?	General
	<i>Response No. 4V:</i> The Converted MTSs (excepting West 59 th Street) will be sized to receive and process 30 collection vehicles during the peak waste delivery hour. This peak hourly receiving capacity uses on-floor storage and enables DSNY to maintain the efficiency of its collection operations (for example, two dumps on shift in some cases) and to avoid queuing of vehicles on neighboring streets. During most hours of the day, an MTS will operate substantially below its peak hourly rating. The theoretical design capacity of an MTS is 4,290 tons per day (10 containers per hour times 22 tons per container times 19.5 working hours per day). To provide conservatism in the environmental review, the theoretical design capacity of 4,290 tpd is used to evaluate the potential for on-site air quality, odor and noise impacts.	
	<i>Comment No. 5V:</i> All of the waste on the tipping floor will create a hazardous condition for the front-end loader operator.	

Category	V. Other	Source of Comment
	Response No. 5V: Transfer Stations are typically built with a substantial volume of on-the-floor storage. This enables the facility to efficiently receive peak hour waste deliveries and subsequently process it. DSNY has conducted extensive evaluations of operational scenarios and found the waste storage volume to be sufficient for its operational needs.	
	Comment No. 6V: The environmental impacts for the final waste disposal site should be examined.	General
	Response No. 6V: The scope of the DEIS review does not extend to existing permitted disposal facilities outside the City. The companies who may be selected to provide disposal service to the City are required to provide extensive documentation of the permit status of their facilities. DSNY conducts a due diligence investigation of these disposal facilities.	
	Comment No. 7V: There should be guaranteed offsets of closures of private facilities for the new MTS facilities to open.	Written Comment
	Response No. 7V: This issue is one that will likely be addressed in the Draft New SWMP and during the Draft New SWMP adoption process.	
	Comment No. 8V: There should be host benefits to the community where the MTSs are sited.	Written Comment
	Response No. 8V: This issue is one that will likely be addressed in the Draft New SWMP and during the Draft New SWMP adoption process.	
	Comment No. 9V: Where will the waste ultimately be disposed?	General
	Response No. 9V: DSNY has issued RFP procurements for waste transport and disposal services from private companies. The proposals received offer a range of out-of-City disposal options and are in the process of being evaluated.	
	Comment No. 10V: The outreach for these scoping meetings was inadequate.	General

Category	V. Other	Source of Comment
	<p>Response No. 10V: For each of the 10 Community Districts having a proposed MTS, a list of stakeholders was obtained from the Community Board offices. Meetings were then arranged with the District Managers to discuss the enhanced outreach plan developed, and to verify information concerning the project area. In the two instances where the District Managers or their representatives would not accommodate a meeting, web searches were conducted to gather stakeholder and demographic information. Invitational flyers were sent out to potential stakeholders, and a toll-free inquiry hotline was established to receive comments and answer questions concerning the project. The District Managers identified mainstream and community-based newspapers, language translation and interpretation needs, meeting venue preferences and nearby repository locations. To supplement the formal notices that were placed in the City Record and NYSDEC's Environmental Notice Bulletin, targeted display ads were sent to a total of 12 community-based newspapers, with notices also placed in Spanish, Korean and Chinese newspapers. Scoping Meeting locations were held for the most part at sites suggested by the Community District Managers, when available. In addition, approximately 3,000 invitational tri-fold flyers were mailed to the stakeholders identified in the 10 Community Districts. Additional fliers were sent to the document repositories, and a minimum of 10 copies were sent to the respective Community Board Offices. In addition, information on these meetings was posted on DSNY's website.</p>	
	<p>Comment No. 11V: How many workers' compensation claims for emphysema, asthma and lung diseases have been filed by sanitation workers as a result of routine waste collection activities?</p>	
	<p>Response No. 11V: The response sought would not provide useful information about any health risks associated with waste collection. Sanitation worker claimants may have underlying conditions, may be smokers, may have been or continue to be exposed to allergens in the home or non-work environment, or may have been exposed to other substances through prior work experiences; while not called for here, to make a valid association between waste collection and worker health, a full-blown epidemiologic study comparing sanitation workers to other workers would need to be done.</p>	
	<p>Comment No. 12V: How will currents in the East River affect the barging operations?</p>	
	<p>Response No. 12V: Although the currents have to be considered in barge shifting operations, DSNY has utilized barge towing services in the East River for approximately 50 years in operating the existing MTSs. In addition, the proposed barge mooring and towing operations have been reviewed with two of the tug operators who have previously worked for DSNY.</p>	East 91 st Street
	<p>Comment No. 13V: Is the energy expended in compacting the waste and barging it out of the City an efficient use of materials?</p>	West 59 th Street

Category	V. Other	Source of Comment
	Response No. 13V: Waste at the Converted MTSs will not be processed by compactor machinery. It will be pushed by front-end loaders through slots in the floor into special intermodal containers.	
	Comment No. 14V: The sanitation facility should be removed from the Gansevoort Peninsula.	West 59 th Street
	Response No. 14V: Among the alternatives under consideration for the Recycling Program is development of a Recyclables acceptance facility at the Gansevoort location or another waterfront location in Manhattan to receive DSNY collection truck deliveries of Curbside Recyclables that would potentially be barged to a waterfront Recyclables processing facility at the 30 th Street Pier at the South Brooklyn Marine Terminal.	
	Comment No. 15V: The Environmental Performance Commitments and Sustainable Design Guidelines developed in conjunction with the reconstruction of the WTC site should be used at the MTS facilities, as should the USEPA’s book “Waste Transfer Stations” and the National Environmental Justice Advisory Council March 2000 report for siting waste transfer stations.	West 59 th Street
	Response No. 15V: DSNY is familiar with these documents and has incorporated several of the guidelines into the design of the Converted MTSs.	
	Comment No. 16V: It is the current administration’s policy to privatize waste handling in the City, and to incinerate waste.	Port Morris
	Response No. 16V: No, the administration’s policy is to export waste in an environmentally sound and economic manner, by minimizing transport by transfer trailer and maximizing barge and rail waste transport.	
	Comment No. 17V: There should be an analysis done to show there is sufficient rail capacity to handle waste going out by rail.	Written Comments
	Response No. 17V: DSNY is evaluating information on rail capacity on an ongoing basis. DSNY will also conduct an informational process to update its information on intermodal facilities in the New York harbor region.	
	Comment No. 18V: DSNY should commit to closing the land-based private transfer facilities if the MTSs are converted.	General from Bronx and Brooklyn
	Response No. 18V: This issue is one that will likely be addressed in the Draft New SWMP and during the Draft New SWMP adoption process.	
	Comment No. 19V: The East 91 st Street MTS study area includes Stanley Isaacs and John Holmes communities, which are EJ communities, contrary to what the Scoping Document states.	East 91 st Street

Category	V. Other	Source of Comment
	<p>Response No. 19V: DSNY recognizes that these developments house low income households. The technical guidance published by NYSDEC uses USEPA criteria and U.S. Census data to define Environmental Justice communities based on the total proportion minority and/or low income families. Although the East 91st Street project area does not satisfy these criteria, DSNY is nevertheless conducting the same enhanced public participation program in the East 91st Street project area as it has in other communities.</p>	
	<p>Comment No. 20V: Detailed design drawings and operational methods should be made available for public review.</p>	East 91 st Street
	<p>Response No. 20V: Detailed design drawings are available for public review as part of the draft Part 360 Permit documents that have been distributed to public repositories in each Converted MTS and Alternative project area. A list of these locations is included in the Draft and Final Scoping Documents.</p>	
	<p>Comment No. 21V: There should be a plan for safeguarding the MTSs (from terrorism).</p>	East 91 st Street
	<p>Response No. 21V: In response to the events of September 11, 2001, the City has developed procedures to secure all City agency facilities. While unlikely to be a target, the existing MTSs are properly secured; the proposed Converted MTSs will be manned around the clock and appropriate security measures will be implemented to insure that they are not vulnerable to terrorist attack.</p>	
	<p>Comment No. 22V: Would you let your children or grandchildren play within 20 feet of a garbage truck?</p>	East 91 st Street
	<p>Response No. 22V: Of necessity, DSNY collection vehicles travel on public streets to pick up refuse and deliver it to Transfer Stations. DSNY has made a commitment that there will be no queuing of collection vehicles on public streets in the vicinity of the Converted MTSs. The trucks that are queued will be on ramps that are inaccessible to the public.</p>	
	<p>Comment No. 23V: The City needs to analyze how long unloading will take in order to discuss queuing.</p>	East 91 st Street
	<p>Response No. 23V: The Converted MTSs are designed on the basis that six tipping bays will accommodate trucks with a total turnaround time, including time for weighing in, weighing out and tipping a load, of 10 minutes. On this basis, the MTSs can handle 30 vehicles an hour during a peak hour and higher number of vehicle if conditions require.</p>	
	<p>Comment No. 24V: Why is the City moving forward on a proposed action which has the potential to result in one or more significant adverse impacts on the environment?</p>	East 91 st Street
	<p>Response No. 24V: All significant unmitigatable adverse impacts will be disclosed in the DEIS.</p>	
	<p>Comment No. 25V: The population in the census tracts surrounding the MTS is under-counted.</p>	East 91 st Street
	<p>Response No. 25V: Demographic information will be compiled according to the same methodology for all sites in a manner consistent with CEQR guidelines.</p>	

Category	V. Other	Source of Comment
	Comment No. 26V: The visual impact of the MTS should be assessed, especially the views looking north from the western end of Pier 97.	West 59 th Street
	Response No. 26V: The DEIS will contain a section to assess visual impact on the environment.	
	Comment No. 27V: The proposed layout of the MTS extends into areas not currently owned by the City, specifically between the Pierhead line and the Watergrant line, and the fendering system extends even further into the navigable channel of the East River, creating a hazard to navigation.	East 91 st Street
	Response No. 27V: Navigational issues will be addressed in permit applications to be submitted for the construction and operation of the Converted MTSs, and as such, will be subject to regulatory and legal review.	
	Comment No. 28V: The employee parking lot is not shown on the proposed site plan.	Written Comment
	Response No. 28V: The site does not have sufficient upland property to accommodate employee parking. It is not a requirement of the Zoning Code that it be provided. The location provides ready access for employees to use public transportation to and from the facility.	
	Comment No. 29V: There was concern with some of the equipment in terms of its efficiency during winter icing conditions to achieve stated facility throughputs.	Written Comment
	Response No. 29V: There have been in the past and there will be in the future winter weather conditions that affect the collection and disposal of the City's waste. There is emergency capacity available in the MTS system that will allow DSNY to play catch-up as soon as weather conditions improve.	
	Comment No. 30V: What materials will be handled by the barges located at the 52 nd Street Staging Area, and will they be staged empty or full? And how will this facility affect the waterfront park sited between 43 rd and 50 th Streets?	
	Response No. 30V: The 52 nd Street Staging Area is proposed to be used as temporary mooring location for holding barges that are in transit to another facility for scheduled maintenance. There will be no handling of uncontainerized waste at this location.	
	Comment No. 31V: What are DSNY's intentions regarding the 65 th Street intermodal facility, and will this result in additional vehicular traffic?	Written Comment
	Response No. 31V: This facility is proposed as an intermodal transfer point to move containers from barges to rail, resulting in no additional vehicular traffic associated with waste hauling operations. It is one of several intermodal facilities proposed by companies responding to DSNY's MTS Containerization RFP for Transport and Disposal Services that DSNY is evaluating as part of the MTS Conversion Program.	

Category	V. Other	Source of Comment
	<i>Comment No. 32V:</i> The SWMP must coordinate with municipalities in the region that lie along rail alignments or waterways of waste transport operations, and must address regional coordination of waste transport to nearby and remote disposal landfills.	
	<i>Response No. 32V:</i> This is the responsibility of the railroads that would provide transport services.	
	<i>Comment No. 33V:</i> There are several errors in the Scoping Document concerning reference to an erroneously numbered figure, e.g., Section 2.8 concerns the West 59 th Street MTS, but its figures depict the facility at East 91 st Street.	West 59 th Street
	<i>Response No. 33V:</i> Some text and graphics in the CWM Study Volume III, Appendix A, MTS Environmental Evaluation were mismatched. This is being corrected.	
	<i>Comment No. 34V:</i> Several Alternatives are missing from the Draft Scoping Document, notably, why was there no Alternative which considered the use of a private Transfer Station in Brooklyn or Queens which could handle the entire Greenpoint Avenue Wasteshed?	Written Comment
	<i>Response No. 34V:</i> DSNY can develop the Converted Greenpoint MTS to perform this function.	
	<i>Comment No. 35V:</i> Why did Alternatives to the East 91 st Street MTS not include trucking waste to the Harlem River Yard Transfer Station in the Bronx?	Written Comment
	<i>Response No. 35V:</i> It is the City's policy to distribute facilities equitably among the boroughs.	
	<i>Comment No. 36V:</i> Additional locations should be included as potential intermodal transfer points, e.g., Maspeth Yard, Red Hook Marine Terminal, South Brooklyn Marine Terminal and Howland Hook Marine Terminal.	Written Comment
	<i>Response No. 36V:</i> With the exception of the South Brooklyn Marine Terminal, the above locations are permitted intermodal facilities that may be used for intermodal transfer of waste containerized at a Converted MTS or a private transfer station that DSNY contracts with for long-term export services. On-site analyses will not be conducted for these sites; transfer of sealed containers at intermodal facilities is not subject to environmental review. However, truck deliveries of containerized waste to and from the intermodal sites will be assessed for potential air quality, noise and traffic impacts. The South Brooklyn Marine Terminal is a proposed new site for processing truck and barge deliveries of Curbside Recyclables. The environmental review appropriate to this facility will be reported in the DEIS.	
	<i>Comment No. 37V:</i> The tonnage offsets should be 1:1, putrescible tonnage for putrescible tonnage.	Greenpoint
	<i>Response No. 37V:</i> The RFPs for the use of private transfer sites required proposers to propose offsets for new Transfer Station capacity by securing an equivalent ton for ton reduction in the capacity of currently permitted Transfer Stations within the same project area. The requirement can be satisfied by reductions in putrescible or non-putrescible permitted capacity.	

This page intentionally left blank.