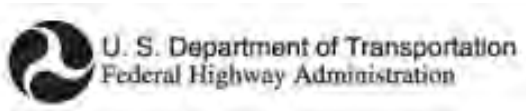


Appendix M-5
Responses to Comments Received

I-81 Viaduct Project

Onondaga County, New York

Responses to Comments Received on the Draft Design Report/ Draft Environmental Impact Statement (DDR/DEIS)



April 2022

TABLE OF CONTENTS

1	Introduction	1
2	Project Purpose, Objectives, and Need	2
2-1	Purpose	2
2-2	Goals and Objectives	3
2-3	Project Limits.....	4
2-4	Project Setting	4
3	Viaduct Alternative.....	5
4	Community Grid Alternative	6
4-1	General	6
4-2	I-481	8
4-3	Business Loop 81.....	20
4-4	BL 81 – Southern Segment (South of I-690)	22
4-5	BL 81 – Northern Segment (North of I-690)	31
4-6	I-690 Ramps and Other Improvements	35
4-7	Bicycle, Pedestrian, and Other Improvements to Local Streets	37
4-8	Urban Design/Aesthetics/Gateways.....	44
4-9	Miscellaneous	47
5	Other Potential Alternatives.....	51
5-1	Modified Viaduct Alternative Recommendations.....	51
5-2	Modified Community Grid Alternative Recommendations.....	52
5-3	Skyway / Hybrid Options	53
5-4	Other Potential Transportation Alternatives	66
5-5	Non-Transportation Alternatives.....	68
6	Transportation Considerations.....	69
7	Social, Economic, and Environmental Considerations.....	103
7-1	General	103
7-2	Neighborhood Character	105
7-3	Social Groups Benefited or Harmed.....	109
7-4	Environmental Justice	109

7-5	Land Acquisition, Displacement, and Relocation	113
7-6	Local and Regional Economies.....	120
7-7	Historic and Cultural Resources.....	127
7-8	Parklands and Recreational Resources	130
7-9	Visual Resources and Aesthetic Considerations.....	132
7-10	Air Quality, Energy, and Climate Change.....	132
7-11	Noise	135
7-12	Natural Resources.....	143
7-13	Farmlands	147
7-14	Construction	147
7-15	Section 4(f) Evaluation	156
8	Public Outreach.....	158
8-1	General	158
8-2	Stakeholder Outreach	159
8-3	DDR/DEIS Public Review.....	161
8-4	Other	162
9	Letters from Organizations and Agencies.....	164
9-1	City of Syracuse	164
9-2	Syracuse Housing Authority	195
9-3	Downtown Committee of Syracuse	204
9-4	Emmi Commerce Park Development Company and Related Businesses	210
9-5	New York State Department of Environmental Conservation (NYSDEC)	215
9-6	Syracuse Metropolitan Transportation Council	217
9-7	Town of Dewitt, Multiple Signatories	226
9-8	Town of Dewitt, Supervisor	230
9-9	U.S. Environmental Protection Agency (USEPA).....	252
9-10	Municipality Letters and Resolutions.....	263
9-11	Town of Salina, Supervisor	276
9-12	Town of Salina, 4th Ward Councilor.....	278
9-13	New York Civil Liberties Union (NYCLU)	282
9-14	Form Letters (via ACLU/NYCLU)	306
9-15	NYU School of Law, Civil Rights Clinic and Center on Race, Inequality, and the Law (NYU Law).....	308

9-16 Central New York Fair Housing	311
9-17 Families for Lead Freedom Now!	313
9-18 New York State Senator Rachel May	320
9-19 Neighbors of the Onondaga Nation	324
9-20 Alliance for a Green Economy	327
9-21 Urban Jobs Task Force	330
9-22 NYCLU Postcards	333
9-23 Pyramid Management Group and Destiny USA	334
9-24 Trucking Association of New York	365
9-25 Northside Business Partnership	377
9-26 Northside UP/Franklin Square I-81 Working Group	381
9-27 CenterState CEO	389
9-28 Central New York Regional Planning and Development Board	394
10 List of Commenters	402

1 INTRODUCTION

This appendix contains the substantive comments received on the Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) for the I-81 Viaduct Project. The public comment period for the DDR/DEIS began with the document's publication on July 16, 2021 and extended to October 14, 2021; however, comments received shortly after the closure of the comment period (through October 19, 2021) were accepted. During that time, the Federal Highway Administration (FHWA) and the New York State Department of Transportation (NYSDOT) received more than 8,000 comment submissions. The public had the opportunity to submit comments through an electronic comment form on the Project website, by email, by U.S. Mail, by written comment form that could be submitted at in-person public meetings, by providing oral testimony to a stenographer at the virtual and in-person public hearings, by dictating them to a stenographer privately at the in-person hearing and the subsequent neighborhood and community meetings, and by calling the telephone hotline and leaving a voicemail. Each comment was reviewed and categorized. Similar comments were grouped and summarized, and a response is provided to each summary comment in this appendix. The original comment submissions are provided in **Appendix M-6**.

Sections 2 through 8 of this appendix present comments grouped by broad topics and, in some cases, more specific subtopics. FHWA and NYSDOT received letters from individuals and groups that contained comments on multiple topics, and these letters are summarized and responded to in Section 9. Section 10 is a list of the commenters with an index to the comment numbers in Sections 2 through 9 where their comments and responses can be found.

2 PROJECT PURPOSE, OBJECTIVES, AND NEED

2-1 PURPOSE

- C 2-1: I-81 should remain as is, or improvements should be made to existing structure.
- R 2-1: As presented in **Sections 1.4.1 and 1.4.2** of the DDR/DEIS and FDR/FEIS, the existing I-81 viaduct, adjacent highway segments, and associated ramps have numerous structural and operational deficiencies, and the highway infrastructure is nearing the end of its intended design life. NYSDOT monitors the condition of the I-81 viaduct and implements repairs as necessary to keep the roadway safe for the traveling public. Although the infrastructure is maintained in a state of good repair to ensure the highway remains safe for the traveling public, continued deterioration would lead to increased maintenance costs and weight and speed restrictions on bridges. Over time, substantial maintenance costs would make continued operation unreasonable and would justify the viaduct's replacement, or removal with vehicular capacity otherwise accommodated, as a more cost-effective long-term solution. Therefore, it is not reasonable to leave the I-81 viaduct "as is," and NYSDOT intends to move forward with a project to remove or replace it. The No Build Alternative would not meet the purpose and objectives of the Project (see **Section 1.1**), nor would it address the identified transportation needs (see **Section 1.4**). Therefore, it is not reasonable to progress the No Build Alternative. However, the National Environmental Policy Act requires the evaluation of a No Build Alternative, which serves as the baseline to which the other alternatives are compared.
- C 2-2: Some proponents of the Community Grid Alternative are promoting new urbanism and believe the selected Project should create neighborhood connectivity, accessible public spaces, and bicycle and pedestrian-friendly streets. New urbanism is the idea that the development of urban areas with a greater focus on interconnectivity among the people is beneficial to the community and ultimately favorable to growth. However, the reality is that the trend in the United States is still toward suburbanization, except for a few major cities. Most Onondaga County residents live outside the City of Syracuse, and very few walk, bike, or use transit to commute. New urbanism has benefits, and should be incorporated, but not at the expense of the economy-at-large or other constituents' needs. Crime also needs to be addressed or the new urban development will not draw people to the area.
- R 2-2: The purpose of the Project is to address structural deficiencies and non-standard highway features while creating an improved transportation corridor through the City of Syracuse that meets the transportation needs and provides the infrastructure to support long-range transportation planning efforts. The DDR/DEIS and FDR/FEIS fully consider potential social, economic, and environmental impacts of the Project within the entire Project Area, including the City and its suburbs.

- C 2-3: The Project should be conducted with the priority being consideration of the health and well-being of people, the second priority being environmental impacts, and the third priority being convenience.
- R 2-3: The Project has been evaluated in accordance with requirements of the National Environmental Policy Act (NEPA) and the DDR/DEIS and FDR/FEIS fully consider potential social, economic, and environmental impacts of the Project.
- C 2-4: NYSDOT claims that I-81 divides the city and is proposing the Community Grid Alternative to remove it. However, nothing is being done about I-690, which also divides the city.
- R 2-4: The Project includes replacement of I-690 infrastructure from Leavenworth Avenue to Beech Street, but NYSDOT did not identify a need to remove I-690 as part of this Project. I-690 was converted to a highway using an old railroad embankment that was elevated through the City of Syracuse. I-690 is predominantly elevated on embankment with occasional bridges over perpendicular streets. It is on a bridge structure through downtown where it interchanges with I-81. Lowering I-690 to street level would pose many challenges to efficiently and effectively move the magnitude of vehicles that currently run through Syracuse. The I-81 viaduct is a 1.4-mile bridge that is elevated through Syracuse and has been for more than 50 years. Under the Community Grid Alternative, the downtown conversion of I-81 to Business Loop 81 (BL 81) is made possible by dispersing the existing vehicular traffic and providing new access points to destinations that travelers are trying to get to. New north and south corridors like the interchange at I-690 with Crouse and Irving Avenues will serve the University Hill area. BL 81 will continue to provide north-south transportation linkages as I-81 does today.

2-2 GOALS AND OBJECTIVES

- C 2-5: The Project does not meet the goals as stated.
- R 2-5: Both build alternatives would meet the Project's goals and objectives, which were developed to meet the purpose of the Project and address the identified transportation needs. The objectives reflect agency and public input. Refer to Table 8-1, which identifies the effects of the Viaduct and Community Grid Alternatives.
- C 2-6: The goals and objectives must be updated to ensure that the Project will not destroy the Southside neighborhoods of Syracuse.
- R 2-6: One of NYSDOT's stated goals for the Project is to "provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse." To that end, NYSDOT has investigated context sensitive design solutions for the Project, seeking input from the City of Syracuse, other stakeholders, and the public. NYSDOT has considered the effects of its proposed transportation infrastructure in all areas where it would be located and has proposed mitigation measures to alleviate the potential environmental effects of Project alternatives.

- C 2-7: There must be an objective that the Project will not increase travel time in any direction.
- R 2-7: The project objectives were developed by FHWA and NYSDOT with opportunity for public input. In 2015, FHWA and NYSDOT issued a final scoping report that included the final project objectives, and these objectives are identified in **Section 1.1** of the DDR/DEIS and FDR/FEIS. The objectives will not be further modified.
- C 2-8: The main objective should be to get commuters as quickly as possible from south of the city to the suburbs. The suburbs are the lifeblood of the county and Central New York and should be held with the most importance. Their needs should be considered above those of the city.
- R 2-8: The identification of a Preferred Alternative is based on consideration of the social, economic, and environmental effects of Project Alternatives and after careful consideration of the public input received.

2-3 PROJECT LIMITS

- C 2-9: There is much discussion about I-81 cutting through the 15th Ward and how its construction affected the Black community. There is no discussion about I-81 cutting right through the Onondaga Nation. Reroute I-81 south of Syracuse so it no longer bisects Onondaga land.
- R 2-9: As defined in DDR/DEIS and FDR/FEIS (see **Section 1.1**), the Project Area for the I-81 Viaduct Project includes I-81 and I-481 from their southern interchange (Interchange 16A) to their northern interchange (Interchange 29). The Onondaga Nation Reservation is south of Interchange 16A outside the Project Area. Therefore, this proposal is outside the scope of the I-81 Viaduct Project.
- C 2-10: The DDR/DEIS includes Hiawatha Boulevard within the Project limits, but no work is proposed there.
- R 2-10: The Viaduct and Community Grid Alternatives include ramp and highway improvements to I-81 or BL 81 between I-690 and Interchange 23. Therefore, Hiawatha Boulevard is considered the northern extent of the Project limits.

2-4 PROJECT SETTING

- C 2-11: The Valley neighborhood is within the I-481 South Study Area and adjacent to the I-481 South Project Limits. Chapter 2 ignores that the area west of I-81 south of Ballantyne Road is known as North Valley (to Seneca Turnpike) and then South Valley (south of the Turnpike), not Outer Comstock, which is northeast. These are different areas with vastly different socioeconomic characteristics. The project setting and socioeconomic characteristics need to be corrected in the DEIS.
- R 2-11: **Chapter 2, Project Setting** of the FDR/FEIS has been updated accordingly.

3 VIADUCT ALTERNATIVE

- C 3-1: The Viaduct Alternative should be advanced. Commenters expressed that this alternative: would maintain a direct, high-speed interstate through the City, which would provide the best travel times for motorists, emergency service providers, and freight; would best maintain access to hotels and other businesses in the Town of Salina, which some business owners feel would be adversely affected by the removal of the interstate designation; would result in further diversion of trucks through the Finger Lakes region; and would not function as a barrier but could be improved with new lighting, landscaping, and bicycle and pedestrian amenities. Commenters also supported a hybrid viaduct alternative (see **Comment 5-10**).
- R 3-1: NYSDOT has thoroughly considered the benefits and disadvantages of the Viaduct Alternative, which were presented in the DDR/DEIS and this FDR/FEIS. Based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental (including visual) effects of the Project alternatives; and national, State, and local environmental protection goals, NYSDOT has identified the Community Grid Alternative as the Project's Preferred Alternative (see **Section 8.3** of the DDR/DEIS and FDR/FEIS).
- C 3-2: The Viaduct Alternative should not be advanced. Commenters expressed that this alternative: would continue to divide the City and would not foster enhanced connectivity in the City; would not improve conditions as compared to today; would result in a longer construction duration and disruption to adjacent neighborhoods and traffic flow; and would require more building acquisitions, including historic buildings.
- R 3-2: The DDR/DEIS and FDR/FEIS describe the potential benefits and impacts of both the Viaduct Alternative and the Community Grid Alternative. After careful consideration of the social, economic, and environmental consequences of both build alternatives, the Community Grid Alternative has been identified as the Preferred Alternative for the Project, as documented in **Section 8.3** of the DDR/DEIS and FDR/FEIS.

4 COMMUNITY GRID ALTERNATIVE

4-1 GENERAL

C 4-1: The Community Grid Alternative should be advanced. Reasons cited include: the alternative would remove the viaduct; improve connections between neighborhoods; return land to the City, thereby increasing its tax base and tax revenues; foster economic development; require fewer building acquisitions than the Viaduct Alternative; repair damage done by the viaduct; and preserve the historic buildings that would be demolished by the Viaduct Alternative. It would be better for pedestrians, incorporate bike lanes, provide an attractive entrance to the City, improve travel and accessibility, provide multiple traffic routes to destinations, reduce traffic speeds in urban areas, and decrease commuter traffic congestion.

R 4-1: As stated in **Section 8.3** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative has been identified as the Preferred Alternative for the I-81 Viaduct Project.

C 4-2: The Community Grid Alternative should not be advanced. Commenters expressed concerns including: the alternative would create traffic congestion on City streets; travel times would increase through and around Syracuse, including to hospitals and for emergency responders; maintenance of BL 81/Almond Street would burden the City's finances; traffic would increase on I-481 (future I-81), increasing congestion, noise, and emissions in eastern suburbs; crime rates are high in the City and people sitting at traffic lights on BL 81/Almond Street and other local streets would be at risk; businesses that rely on the existing I-81 alignment would suffer; BL 81/Almond Street would be a wide boulevard and would not enhance connectivity; the alternative would not re-create what existed before the early 1960s or ameliorate past harm; putting traffic on ground level through neighborhoods would create further disruption to communities.

A Southside business owner and County legislator submitted a telephone survey of 400 adults conducted by John Zogby Strategies from October 3 through October 6 in Syracuse and the rest of Onondaga County, which showed that many residents oppose the Community Grid Alternative and favor keeping I-81 in its current alignment. The survey showed that 18 percent of residents who live closest to I-81 support the Community Grid Alternative and over 70 percent of respondents want to maintain the functionality of I-81. The state and federal government should stop moving the EIS process forward and engage the community in advancing a project that meets the needs and objectives of all stakeholders.

R 4-2: NYSDOT carefully considered the social, economic, and environmental effects of the Community Grid Alternative, which are presented in the DDR/DEIS and FDR/FEIS, and considered all input received regarding advantages and disadvantages of the Community Grid Alternative. Based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the project alternatives; public and agency input; and national, State, and local environmental protection goals, the

Community Grid Alternative has been identified as the Project's Preferred Alternative (see **Section 8.3** of the DDR/DEIS and FDR/FEIS). The DDR/DEIS and FDR/FEIS include analyses of the full range of potential social, economic, and environmental effects of the Project. Where adverse effects are identified, the DDR/DEIS and FDR/FEIS describe measures to mitigate these effects (see **Chapter 6, Social, Economic, and Environmental Considerations**). The DDR/DEIS and FDR/FEIS also include analysis of the effects of the Project on environmental justice populations and concludes that the Community Grid Alternative would not result in disproportionately high and adverse effects to environmental justice populations (see **Section 6-2-3**).

NYSDOT has also considered the potential for changes in traffic within Central New York using the I-81 Project Travel Demand Model, and the potential effects of the Community Grid Alternative on traffic are disclosed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS. Potential effects on regional and local economies are discussed in **Section 6-3-2** of the DDR/DEIS and FDR/FEIS. Also, see responses to comments in Section 6 of this appendix regarding traffic considerations. NYSDOT would own and be responsible for maintenance of BL 81, while local streets would continue to be maintained by the City of Syracuse, as they are today. NYSDOT will continue collaborating with the City of Syracuse regarding ownership and maintenance of local streets in the Project Area.

- C 4-3: The design of the Community Grid Alternative must consider the ongoing maintenance needs. There must be adequate space for crews to maintain lawns and landscaping and for depositing snow. The responsibility for maintenance and snow removal for the Community Grid Alternative would fall on the City of Syracuse. This would burden the City's limited assets. Establish a special fund to ensure the long-term maintenance of infrastructure and city streets used for the Grid. Develop a "shared services agreement" of some fashion with the city that shares the maintenance costs for the upkeep of the elements installed under the project, so the cost of replacement and maintenance is not solely the responsibility of the city, which currently struggles to maintain its infrastructure.
- R 4-3: Maintenance needs have been considered in the design of the Community Grid Alternative and incorporated as part of the Project cost estimates. NYSDOT would own and maintain BL 81, which includes Almond Street and sections of Erie Boulevard, Oswego Boulevard, and Pearl Street, as well as the highway components south of MLK, Jr. East and north of Downtown Syracuse. The majority of the maintenance would be funded through NYSDOT's annual budget. NYSDOT will coordinate with the City of Syracuse on maintenance of landscaping and other features outside the curb line as well as the ownership and maintenance of local streets in the Project Area.
- C 4-4: Incorporate transit improvements into the Community Grid Alternative. The Project should include bus shelters, Centro coordination, and BRT accommodations.
- R 4-4: A stated objective of the Project is to "maintain access to existing local bus service and enhance transit amenities within the Project limits in and near Downtown Syracuse." "Transit

amenities" refers to bus stops and shelters, bus turnouts, and layover and turnaround places within the Project limits in and near Downtown Syracuse. As final design advances, NYSDOT will continue to coordinate with Centro on potential street improvements. In addition, NYSDOT considered the potential effects on public transit, pedestrians, and bicyclists for both build alternatives (see **Sections 6-2-2.3.1** and **6-2-2.4.1**).

While transit improvements other than enhancements to transit amenities within the Project limits in and near Downtown Syracuse are not part of the I-81 Viaduct Project, the Project would not preclude Centro or others from carrying out transit improvements in the future, as separate, independent actions.

- C 4-5: As part of the Community Grid Alternative, NYSDOT should remove tolls on the New York State Thruway (I-90) between Exits 34a and 36. This would improve traffic flow and be a benefit to the hotels in Salina.
- R 4-5: Modifications to I-90 and its toll structure are outside the jurisdiction of NYSDOT, as it is owned and operated by the New York State Thruway Authority.
- C 4-6: The project is too expensive, and the public cannot afford it. Our tax dollars are being spent on liberal nonsense, and the middle class bears this cost. There are better ways to spend the money to benefit Syracuse, such as building more reliable public transportation and more affordable housing. The current economy cannot support an expensive project like this.
- R 4-6: The I-81 Viaduct Project is being funded with a mix of Federal, State, and potentially some local funding. While public transportation improvements other than enhancements to transit amenities within the Project limits in and near Downtown Syracuse are not part of the I-81 Viaduct Project, the Project would not preclude Centro or others from carrying out transit improvements in the future, as separate, independent actions. Building more affordable housing is outside the scope of the I-81 Viaduct Project.

4-2 I-481

MAINLINE/GENERAL I-481

- C 4-7: Include improvements along I-481, such as additional travel lanes for I-481 and improved lighting. Clarify if additional lanes would be required on I-481 between I-690 and the Thruway to accommodate the additional traffic that would be re-routed from I-81. Extend the farthest left lane on southbound I-481 beyond the I-690 merge.
- R 4-7: The Project has been designed to accommodate travel demand. Extending the left lane on southbound I-481 beyond the I-690 merge is not necessary to accommodate travel demand. As described in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS, under the Community Grid Alternative, improvements to I-481 would include the following:

- A third southbound (auxiliary) lane would be added between Kirkville Road (existing Interchange 5 southbound entrance ramp) and I-690 (existing Interchange 4 southbound exit ramp), requiring a widening of the bridge over the CSX railroad tracks.
- A third northbound (auxiliary) lane would be added between I-690 (existing Interchange 4 northbound entrance ramp) and Kirkville Road (existing Interchange 5 northbound exit ramp), requiring a widening of the bridge over the CSX railroad tracks.
- A third northbound (auxiliary) lane would be added between Kirkville Road (existing Interchange 5 northbound entrance ramp) and I-90 (existing Interchange 6 northbound exit ramp).
- A third southbound (auxiliary) lane would be added between existing Interchange 9 (I 81/I-481 north interchange) and Northern Boulevard (existing Interchange 8) southbound exit ramp.
- The southbound exit ramp to eastbound Route 5/92 (existing Interchange 3; NYS Routes 5 and 92) would be replaced by combining it with the southbound to westbound exit ramp to westbound Route 5/92, thereby increasing capacity and addressing an existing crash pattern. Route 5/92 would be widened at the ramp intersection and a new traffic signal would be added.
- As a result of relocating the southbound I-81 to eastbound Route 5/92 ramp, the short weaving section between the existing southbound entrance ramp and southbound exit ramp would be eliminated and the southbound entrance ramp acceleration lane would be extended to meet current design standards.
- The northbound entrance ramp to existing I-481 from westbound Route 5/92 would be extended. The existing entrance ramp is a two-lane ramp, but the outer lane ends approximately 500 feet after merging with northbound I-481; this lane would be extended approximately 1,800 feet to improve merging Level of Service.
- I-481 signage would be replaced with I-81 signage, and interchanges would be renumbered to correspond to the sequencing of I-81 interchanges south and north of Syracuse.

The installation of lighting on I-481 must meet the lighting warrants and would be installed if the local municipality agrees to maintain and operate the lights.

C 4-8: Both I-481 and I-690 should be three lanes in each direction.

R 4-8: Improvements to existing I-481 and I-690 are described in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS. I-481, which would become the new I-81, would carry a minimum of four travel lanes (two in each direction) of through traffic; expanding the entire I-481 corridor to three lanes in each direction is not warranted based on travel demand. Multiple areas of I-481 converted to the new I-81 would include three travel lanes in each direction. I-690 would be three lanes in both directions.

- C 4-9: Exits on the new I-81 (existing I-481) must be improved to potentially two-lane exits, especially at Interchange 3 where there is already a tremendous amount of congestion.
- R 4-9: Exit lanes on the new I-81 have been designed to accommodate anticipated traffic. At most locations, two-lane exits are not warranted; however, at Interchange 3, the Community Grid Alternative would reconfigure the interchange to include a two-lane exit, which expands to four lanes, to serve both DeWitt and Fayetteville.
- C 4-10: Please consider a new connection between Seneca Turnpike (NY 173) and I-81. This would reduce travel times for people coming from the western suburbs.
- R 4-10: An exit at NY 173 would not be feasible because it would be too close to the BL 81/I-81 Southern Interchange. A new interchange at East Glen Avenue, which would be relocated (refer to **Section 3.4.3** for a description of the improvements in this area), would improve connectivity between NY 173 and either BL 81 or I-81.

I-81/I-481 SOUTHERN INTERCHANGE

- C 4-11: The Community Grid Alternative must include improvements at Interchange 16A.
- R 4-11: As discussed in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS, the existing southern I-81/I-481 interchange would be reconstructed to meet a 70 mph design speed (with a posted speed of 65 mph) for the new mainline I-81 and a 60 mph design speed (with a posted speed of 55 mph) for BL 81. The reconfigured interchange would provide all directional movements. The ramps connecting I-81 and BL 81 would be designed as a high-speed merge and diverge, and the new diamond interchange at relocated East Glen Avenue/BL 81 would improve connectivity to Brighton Avenue and the surrounding area.
- C 4-12: With the proposed roadway reconfigurations around Interchange 16A and reconstruction of the East Glen Avenue bridge, Loretto is concerned about the funneling of traffic onto Loretto's property, including heavy cut-through traffic on the property through Fillmore Avenue and South Salina Street, as evidenced by the projected increases in traffic of up to 7,500 vehicles daily that might rely on this new exit point*; safe and efficient access to the campus during and after construction for employees, medical personnel, emergency service providers, and visitors; and disruption to water services.

To mitigate safety concerns, NYSDOT's plan must provide exclusive access to Loretto traffic, a security checkpoint, and convenient egress for those who unintentionally enter the campus. Loretto has developed a plan to address each of these concerns (see attached drawings). Loretto's plan would remove the cut-through to Fillmore Avenue, improve campus circulation, add security and signage, reconfigure parking, and relocate the water supply. Additionally, Loretto's plan also provides for a second source of water from Seneca Turnpike (not shown on the attached). This will service the campus during construction and provide a sustainable water supply over the long run.

Construction will require planning and close coordination to ensure that there are no disruptions to phone, utilities, or data services. Plans must provide emergency protocols if any lines are cut or taken offline. Elements of Loretto's plan are summarized below:

- New access gate and employee entrance at Fillmore Avenue
- New access drive along the western boundary to employee parking areas
- New drive circle to improve circulation and maneuverability for buses and emergency vehicles
- New security booth and security cameras
- New lighted signage to orient drivers as they enter the campus
- Add a second drive lane at the main entry to limit traffic congestion during shift changes
- New 10-inch water feed from Brighton Avenue, bring the 10-inch across the bridge to a new meter pit with full flow 8-inch or 10-inch fire meter.
- Relocate the Heritage Building water meter to the new meter pit
- Create an easement to the new water meter for City of Syracuse Water Department access
- Add conduits on the bridge for future services such as fiber-optics, phone / Data, etc.
- Build a walkway from Brighton Avenue to the campus for pedestrian and bike traffic
- Add sound and pollution barriers to protect the campus during construction and over the long run.

R 4-12: NYSDOT will work with Loretto to develop a plan that reconnects East Glen Avenue with Loretto's adjacent driveways. Access to the campus would not be disrupted during the construction of the new entrance. The plan would include work at the entrance to the property including a new drive circle to improve circulation and maneuverability for buses and emergency vehicles; however, internal circulation routes within Loretto would remain Loretto's responsibility and not be constructed by NYSDOT. The Project would not preclude such improvements. Likewise, NYSDOT has no authority to install a gate on a city street. Regarding campus safety, NYSDOT recognizes that the driveway at East Glen Avenue is a private driveway and will schedule a meeting with Loretto representatives to refine the plan details.

NYSDOT has been coordinating with the City water department. NYSDOT recognize that the water main on the existing East Glen Avenue bridge would need to be relocated to the new, replacement bridge; this would be done in such a way as to ensure no service disruptions. NYSDOT will work with the city on the details of the relocated water service during final design; however, relocation of the Heritage Building water meter to the new meter pit is beyond the scope of the Project. An easement for the new water meter for City water department access would be the responsibility of the City water department.

A second entrance from Seneca Turnpike would be beyond the scope of the Project and would need to be progressed by Loretto as a separate action in consultation with the City of Syracuse, which owns the roadway.

New security booths and cameras would not be provided for a private facility.

While NYSDOT could potentially provide location signage for Loretto along the highway system, new signs within the Loretto campus would be Loretto's responsibility. Based on the level of service analysis, a second lane on East Glen Avenue at the entrance to the property is not warranted; however, the Project would not preclude Loretto from adding a second lane within its campus.

NYSDOT would relocate any utilities currently located on the existing bridge; however, enhancements for additional facilities may be a betterment. NYSDOT would provide a shared use (bicycle/pedestrian) path from Brighton Avenue to the campus. NYSDOT would provide a visual barrier and other construction-related provisions (refer to **Table 4-7**) as early as possible in the construction process; however, it may not be possible to install the barrier at the very beginning of the construction.

NYSDOT looks forward to continuing to work with Loretto during the final design phases to address their concerns.

INTERCHANGE 2

- C 4-13: There must be a continuous third travel lane between the new BL 81/I-81 south interchange and the current Interchange 3 on I-481 (future I-81). Acceleration and deceleration lanes are not enough to handle the future traffic that will use the road. Similarly, the existing on-ramps at Interchange 2 on I-481 are too short to allow the heavy truck traffic to properly reach highway speeds to merge. The I-481 southbound on-ramp should be extended to the railroad bridge, and the I-481 northbound on-ramp should be extended to the off-ramp at Interchange 3, making this an on/off-ramp lane only.
- R 4-13: Based on the traffic studies, a continuous third lane between the new BL 81/I-81 south interchange and the current Interchange 3 on I-481 (future I-81) is not warranted. Levels of service along the roadway in this area would be LOS C or better during the peak hour in 2056 (refer to **Table 5-52** of the DDR/DEIS and FDR/FEIS). Improvements to the Interchange 2 area are not within the scope of this Project. Note that projected 2056 traffic levels of service operate adequately. Acceleration/deceleration lanes on existing I-481 meet current interstate standards and do not need to be modified.

INTERCHANGE 3, NYS ROUTES 5/92, AND LYNDON CORNERS

- C 4-14: Consider a landscaped buffer such as a berm or trees on southbound I-481 between Jamesville Road and Interchange 3. It would protect multiple neighborhoods in DeWitt.
- R 4-14: The construction of berms/barriers and planting trees will be further analyzed during the final design phases.
- C 4-15: The Community Grid Alternative must include improvements at the existing Interchange 3 on I-481. This area experiences heavy traffic, which will be worse when the road is renamed I-81. The proposed improvements to Interchange 3 do not accommodate westbound traffic and impede eastbound traffic by adding a new traffic light. New dedicated ramps are needed so

east-west and north-south traffic do not have to merge through each other. The proposed improvements at Interchange 3 along I-481 (future I-81) should not eliminate a lane for vehicles heading east on Genesee Street but should add a lane.

R 4-15: The proposed improvements at Interchange 3 have been designed to accommodate travel demand. These improvements include:

- The southbound exit ramp to eastbound Route 5/92 (existing Interchange 3) would be replaced by combining it with the southbound to westbound exit ramp to westbound Route 5/92 and a new traffic signal would be added.
- The northbound entrance ramp to existing I-481 from westbound Route 5/92 would be extended.
- As a result of relocating the southbound I-81 to eastbound Route 5/92 ramp, the short weaving section between the existing southbound entrance ramp and southbound exit ramp would be eliminated and the southbound entrance ramp acceleration lane would be extended to meet current design standards.
- An additional eastbound right turn lane and replacement of the traffic signal at the intersection of Route 5/92 (Lyndon Corners).

Refer to **Sections 3.4.3** and **5.6.1** for a more detailed description.

C 4-16: The plans for Interchange 3 are inadequate. They do not address the heavy traffic exiting to travel east on Route 5, which must deal with traffic exiting to eastbound Route 92. Traffic entering southbound I-81 would need to cross three lanes of traffic.

R 4-16: The reconfiguration of Interchange 3 under the Community Grid Alternative would substantially improve traffic operations at the interchange including the heavy southbound I-81 to eastbound Route 92 movement. In addition, the westbound Route 5/92 to southbound I-81 movement would not be affected by the proposed triple left turn and would be improved by the proposed design since it removes the existing weaving merge on I-81.

C 4-17: Eliminating the current eastbound I-481 Interchange 3E cloverleaf and requiring all traffic to exit at the current Interchange 3W and installing a light and requiring eastbound traffic to turn left even with two left-hand turn lanes will lead to congestion.

R 4-17: A detailed traffic study of this interchange area was performed, and the improvements that have been integrated into the Community Grid Alternative at this location were based on the results of that study. The existing eastbound Interchange 3E loop ramp has a high crash rate in several segments, including the area in which the ramp merges into Route 5/92, the segment of I-481 between the on- and off-ramps, and the area north of the 3W exit, where traffic can back up to I-690. The proposed enhancements address these high crash areas and improve overall safety and operations within the interchange area.

The reconfiguration of Interchange 3 would substantially improve traffic operations for the existing heavy southbound I-481 to eastbound Route 92 movement. The proposed signalized intersection at the southbound I-481 exit (new I-81) ramp with Route 5/92 would be designed to accommodate projected traffic volumes and would operate at an acceptable Level of Service (LOS). In addition, the westbound Route 5/92 to southbound I-81 movement would not be affected by the proposed triple left turn and would be improved by the proposed design since it removes the existing weaving merge on I-81.

- C 4-18: Do not add a new lane at Lyndon Corners, which is the area near and including the intersection of NYS Routes 5 and 92. Traffic can be an issue on this stretch of Route 5/92 but adding a lane will not relieve traffic issues. Instead, it will cause more issues from additional lane changes by motorists. Alternative solutions need to be found for this corner.
- R 4-18: The proposed additional lane at Lyndon Corners would not increase lane changes. Rather, it would allow more vehicles on Route 92 to move through the intersection during the green cycle and would increase signal time for other movements, resulting in overall operational improvements to the intersection.
- C 4-19: Realign the northbound ramp from I-481 to eastbound Route 5 to form a perpendicular intersection.
- R 4-19: Modifications to the existing northbound I-481 off-ramp to eastbound Route 5/92 is not required as the existing ramp is only slightly skewed to Route 5 and the skew is within design standards.
- C 4-20: Please consider the same improvement for the northbound exit to Interchange 3 as is proposed for the southbound exit.
- R 4-20: The existing and anticipated future traffic volumes exiting northbound would operate at acceptable levels of service and do not exhibit the congestion and safety issues found on the southbound ramps. Therefore, no highway changes to the northbound exit ramp at Interchange 3 are included in the Community Grid Alternative.
- C 4-21: Consider a roundabout at Lyndon Corners.
- R 4-21: A roundabout at Lyndon Corners would expand the transportation footprint and result in property acquisitions, and therefore, it is not considered at this time. Also, roundabouts work most efficiently below a certain traffic volume threshold, and the Lyndon Corners intersection greatly exceeds that threshold.
- C 4-22: I-690 should be extended beyond its current terminus with I-481 to alleviate the traffic on Route 5 at Lyndon Corners.

- R 4-22: The Community Grid Alternative includes alternative measures to address congestion at the Route 5 intersection with Route 92. These improvements entail the addition of a new traffic signal and a right-turn lane. The turn lane would begin approximately 600 feet west of the Route 5/92 intersection and end on Route 92, approximately 1,000 feet east of the intersection. Further details are provided in **Section 3.4.3**.
- C 4-23: The proposed modifications at Interchange 3 are excellent and should be implemented with either the Community Grid Alternative or the Viaduct Alternative.
- R 4-23: The Community Grid Alternative would implement the transportation improvements associated with Interchange 3 as part of the I-481 conversion to I-81. The Viaduct Alternative is not the recommended Preferred Alternative for the I-81 Viaduct Project and does not include any transportation improvements along the I-481 corridor.
- C 4-24: To address comments about east-west traffic between I-690 and Lyndon Corners, a change to I-481 Interchange 3 has been added to the plan. However, this change does nothing to accommodate westbound traffic and will make eastbound traffic flow worse by adding a traffic light where there is none now. New dedicated ramps are needed so east-west and north-south traffic do not have to merge through each other.
- R 4-24: A detailed traffic study was performed to inform the recommended improvements at Interchange 3. These measures would address the operational and safety issues that currently exist between Routes 5/92 and the I-481 (future I-81) interchange area.
- C 4-25: There will be impacts to traffic on Route 92 because of the removal of the eastbound "clover leaf" exit (3E) and addition of a four-lane traffic light on East Genesee Street. During the public hearing, NYSDOT explained this was to remove a "difficult" merge from the cloverleaf across lanes to access turn lanes into DeWitt Wegmans. There should be a more prudent and less disruptive solution to such a minor issue.
- R 4-25: A detailed traffic study was performed to inform the recommended improvements at Interchange 3. These measures would address the operational and safety issues that exist between Route 5/92 and the I-481 (future I-81) interchange area.
- C 4-26: Currently, the existing I-481 southbound to eastbound Route 5/92 exit ramp continues onto its own lane on Route 5/92, without a stop sign or traffic light. This creates a steady flow of traffic from a heavily used exit to a heavily used corridor. It should not be removed. The proposed plan would eliminate this ramp--which sees a significant amount of traffic going to Wegmans, Target, Fayetteville, Manlius, Cazenovia, and Chittenango--and replace it with a stop light on Route 5/92. This would create significantly more traffic (which creates more pollution) by backing up both traffic on Route 5/92 and traffic getting off the new I-81. This new plan would be a regression and should be scrapped.

- R 4-26: A detailed traffic study was performed to inform the recommended improvements at Interchange 3. These measures would address the operational and safety issues that exist between Routes 5/92 and the I-481 (future I-81) interchange area.
- C 4-27: One possible alternative for alleviating traffic in the Route 5/92 corridor is to create an exit at Kinne Road. It could be a partial exit where southbound I-481 traffic could get off onto Tow Path Road, and northbound traffic could get on I-481 from Butternut Drive. There is plenty of room there for ramps.
- R 4-27: An exit at Kinne Road is not necessary as the improvements proposed with the Community Grid Alternative would accommodate traffic flow and safety in the Interchange 3 area without it. Additionally, an exit to Kinne Road would not be feasible based on the insufficient ramp spacing requirements relative to the locations of Interchanges 3 and 4.
- C 4-28: The plans for Routes 5/92 do not improve pedestrians and bicyclists' safety and access to East Genesee Street, the Butternut Creek/Erie Canalway Trail, or Wegman's.
- R 4-28: A grade separated pedestrian and bicycle crossing along Genesee Street already exists as existing I-481 passes over Genesee Street at Interchange 3. However, as part of the improvements proposed for Interchange 3 (East Genesee Street at the re-routed I-81) under the Community Grid Alternative, a new signal would be installed at the southbound I-81 off-ramp intersection with Genesee Street, which would improve the pedestrian and bicycle accommodation on the north side of Genesee Street.
- C 4-29: The improvements proposed for Route 5/92 will negatively impact safe access to Jamesville-DeWitt High School.
- R 4-29: The proposed improvements to Interchange 3 and the intersection of Route 5/92 would provide congestion relief and improve travel times for commuters accessing existing I-481 (future I-81) via Route 5/92. However, with these changes in place, traffic volumes are not projected to change substantially on Route 5/92 or the in the areas surrounding Jamesville-Dewitt High School.
- C 4-30: The "free for all" bi-directional center median left-turn lane on Routs 5/92 should be eliminated. At certain times of the day, there is too much traffic to safely make left turns. Some people turning left onto the road use the center lane to merge, which is not its intended purpose. The center lane should be converted to a new, fourth eastbound lane, and a jersey barrier could be installed to separate east-west traffic.
- R 4-30: The bi-directional median area, which is used as a bi-directional left turn lane, is needed to provide access to the many businesses between Edwards Drive and Ely Drive. There are changes proposed in this area as part of the I-81 Viaduct Project.

C 4-31: Residents of DeWittshire expressed the following traffic concerns:

- As south and eastbound traffic backs up on Erie Boulevard north of Kinne Road due to the new traffic light on Route 92, traffic will pour into the Orvilton neighborhood to move west on East Genesee Street.
- As residents of Fayetteville and Manlius attempt to avoid a four-lane traffic light at the end of the exit ramp, they will choose to exit at Jamesville Road and traverse east via Woodchuck Hill Road, which is ill-equipped for an increase in traffic, especially at times of day that students and busses are accessing the high school.
- There was no input regarding the added congestion to back-ups from the traffic light at the intersection of eastbound Route 92 and Erie Boulevard and the already congested intersection during peak hours at Jamesville Road. In fact, these intersections do not even appear within the literature presented to the public.
- Residents of Fayetteville will now seek alternative routes into the City of Syracuse via Kirkville Road and Woodchuck Road to avoid the five traffic lights on East Genesee Street starting at Lyndon Corners through Jamesville Road.

R 4-31: Traffic patterns are not projected to change substantially on Kinne Road, Jamesville Road, or through the Orvilton neighborhood because of the Project. The proposed signalized intersection at the southbound (existing) I-481 exit ramp with Route 5/92 will be designed to accommodate projected traffic volumes and will operate at an acceptable LOS. As a result, queues will be contained to the blocks adjacent to the signal, and substantial congestion or increases in traffic through neighborhoods situated on parallel routes are not anticipated.

INTERCHANGE 4, I-690/I-481, AND MAINTENANCE YARD RAMPS

C 4-32: Interchange 4 at the existing intersection of I-481 and I-690 needs to be improved. This interchange has dangerous merges and tight curves that need to be addressed. If straightening these two lanes cannot be cost-justified, other options to consider include replacement of the on-curve bridge deck with one with much better frictional resistance (grooved concrete), flashing lights on the approach during wet/ice conditions, and changing the need for the maintenance-only ramps which require the two bridges.

R 4-32: A crash analysis was conducted for the southbound I-481/I-690 interchange curve (refer to **Appendix A-3** and **Appendix A-6** of the DDR/DEIS and FDR/FEIS). During the three-year period from 2016 to 2019, the existing crash rate (1.26 crashes per million vehicle miles, acc/mvm) is slightly higher than the statewide average rate (1.14 acc/mvm) at this location. This included 10 crashes in the vicinity of the southbound curve, six of which were potentially related to the non-standard horizontal curve. Most of these crashes were fixed object crashes (guardrail crashes) resulting from a loss of control in adverse weather conditions. A pavement friction evaluation, conducted in accordance with the NYSDOT's Comprehensive Pavement Design Manual, determined that skid resistance is not contributing to the crash history at this location. Modification of the superelevation rate was evaluated and determined not to be feasible as it would result in a non-standard vertical clearance at one bridge and the required replacement of a second bridge. Also evaluated was realignment of the horizontal curve to

meet current design standards, which would require approximately 1,400 linear feet of mainline reconstruction, one bridge replacement, and a retaining wall to avoid replacement of a second bridge. Both potentially impacted existing bridges are in good condition with good remaining service life. Given the low number of crashes, mostly due to inclement weather conditions, and that the existing bridges are in good condition, full reconstruction at this time is not warranted. Rather, geometric improvements could be considered and integrated in the future when bridge maintenance or replacement is required at this location. In the interim, speed warning signs will be added at the curve as part of the Project.

- C 4-33: There is substantial weaving at the I-481 and I-690 interchange, and this will worsen under the Community Grid Alternative. This interchange must be redesigned to work better if the Community Grid plan moves forward.
- R 4-33: The Project includes the extension of the westbound Route 5/92 ramp to northbound I-81 ramp of Interchange 3 by a quarter of a mile. This would provide motorists more time to merge, thereby improving safety.
- C 4-34: To alleviate traffic in the Route 5/92 corridor, open the existing ramps to and from I-481 (future I-81) and I-690 at Butternut Drive.
- R 4-34: Substantial traffic demand modeling was completed for the DDR/DEIS and FDR/FEIS and construction of additional connections to the I-690/I-481 interchange are not needed and are therefore, beyond the scope of the I-81 Viaduct Project. The existing ramps at the I-690/I-481 interchange that are closed for public use provide access to the nearby NYSDOT maintenance facility. Using one of these ramps as a connection to Butternut Street would involve the relocation of the NYSDOT maintenance facility and could negatively impact traffic conditions on the local road system.
- C 4-35: Consider a bypass in DeWitt to alleviate traffic on Route 290 and Genesee Street. This is an alternative originally proposed by NYSDOT in 1988 that was never completed. This bypass would extend from the existing I-690/I-481 interchange eastward to Burdick Street, with a roundabout at Butternut Drive. At the Burdick Street intersection, travelers would have the option to go north toward Chittenango or south toward the Village of Fayetteville.
- R 4-35: Construction of a bypass in DeWitt is beyond the scope of the I-81 Viaduct Project. The existing ramps that are closed for public use provide access to the NYSDOT maintenance facility. Using one of these ramps as a connection to Butternut Street would involve the relocation of the NYSDOT maintenance facility and could negatively impact traffic conditions on the local road system. However, implementation of the Community Grid Alternative would not preclude a DeWitt bypass in the future as a separate action.
- C 4-36: To help ease the amount of traffic heading east using southbound I-481/eastbound I-690/Route 5/92, consider adding a New York State Thruway exit in the Town of Sullivan/Chittenango. The New York State Thruway would provide a good alternative for those

going from Syracuse to the east side of Onondaga County/west side of Madison County. It might also help ease traffic on Route 31.

- R 4-36: Modifications to the Thruway (I-90), which is owned and operated by the New York State Thruway Authority, are outside the jurisdiction of NYSDOT.
- C 4-37: I-690 should be extended east to North Burdick Street, Route 290, or to Chittenango.
- R 4-37: Extending I-690 to Fayetteville and Chittenango is not necessary to meet the purpose and need of the I-81 Viaduct Project, and therefore, it is beyond the scope of the Project (see **Sections 1.1 and 1.4** of the DDR/DEIS and FDR/FEIS).

INTERCHANGE 5

- C 4-38: The Project Team must consider improvements to the Kirkville Road interchange on I-481. There is a lot of new development in this area. Specifically, the exit should lead directly to the rail yard and Amazon facility. Freemont Road should be restricted to residential traffic to remove truck traffic from it and improve access to Richmond Road.
- R 4-38: Improvements to I-481 in the Kirkville Road area are described in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS. Improvements to roadways such as Richmond Road and Fremont Road, as well as restrictions on truck traffic along these roadways, fall under the jurisdiction of the local municipality and are outside the scope of the -81 Viaduct Project.

INTERCHANGE 8

- C 4-39: Redesign the existing interchange of I-481 and Northern Boulevard. The entrance ramp from Northern Boulevard to I-481 (future I-81) is too short to adequately accelerate. Consider lengthening it.
- R 4-39: Based on the Project's traffic analysis, that ramp operates well, and the recommended improvements to Interchange 8 are not warranted (refer to **Table 5-52** in the DDR/DEIS and FDR/FEIS, which presents results of the level of service analysis for the interchange).

NYS 481

- C 4-40: The Circle Drive exit ramp from I-481 does not operate well.
- R 4-40: Modifications to the Circle Drive exit ramp are outside the scope of the I-81 Viaduct Project. However, NYSDOT could implement transportation improvements in the future at this location as a separate project.
- C 4-41: Provide a southbound interchange on NY Route 481 at Caughdenoy Road.
- R 4-41: This section of NYS 481 is outside the Project limits of the I-81 Viaduct Project, and modifications to the Caughdenoy Road are unnecessary to accommodate traffic associated

with the Project alternatives. NYSDOT could implement transportation improvements in the future at this location as a separate project.

4-3 BUSINESS LOOP 81

GENERAL

- C 4-42: The interstate highway system was built to easily mobilize troops and defend the United States. Removing I-81 will eliminate the purpose of the interstate system. The U.S. Department of Defense must review this plan.
- R 4-42: I-481 would become the new I-81 and have capacity to support military operations. BL 81 would be designated as a Qualifying Highway and designed to handle large, heavy vehicles. The Qualifying Highway designation is used in New York State to depict a National Network Highway, or a highway designated as part of the federal Surface Transportation Assistance Act (STAA) of 1982 (P.L. 97-424). As a Qualifying Highway, BL 81 would be designed with the physical characteristics to accommodate large, heavy vehicles along its length. These characteristics include appropriate horizontal and vertical alignments, lane widths (12 feet wide), turning radii, sight distance, and auxiliary lanes with acceleration/deceleration lanes of sufficient length and storage (see Design Criteria Tables in **Appendix C-6** for more information about design characteristics). For example, all city street intersections would be designed to allow buses and SU-30 (single unit with three axles) trucks to turn at them, and highway ramps would be designed to accommodate WB-67 (53-foot tractor trailer) trucks. Under the Community Grid Alternative, Qualifying Highways, including BL 81 and interstate system roadways, and designated truck access routes, including local roadways, are subject to change from the existing condition. These changes are identified in **Appendix B-5**.
- C 4-43: Define “business loop” and “qualifying highway” in terms of truck size and truck speed and lane width. There is no evidence that the road must be categorized as a business loop or qualifying highway. The ‘business loop’ should be changed to an appropriate street or highway through the city that is safe for residential neighborhoods.
- R 4-43: As explained in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS, a business route, as defined by the American Association of State Highway and Transportation Officials, is “a route principally within the corporate limits of a city which provides the traveling public an opportunity to travel through that city, passing through the business part of the city, while the regular number is used to obviate passing through the congested part of the city.” A “business loop” is a route that leads into a downtown business district and returns to the freeway at the other end. BL 81 would be designated as a Qualifying Highway and designed to handle buses, recreational vehicles, and trucks, including large, heavy vehicles with a width limit of 102 inches. The Qualifying Highway designation is used in New York State to depict a National Network Highway, or a highway designated as part of the federal Surface Transportation

Assistance Act (STAA) of 1982 (P.L. 97-424) as one that allows STAA vehicles¹ and 53-foot trailers to use it as well as any other highway within one linear mile. As a Qualifying Highway, BL 81 would be designed with the physical characteristics to accommodate large, heavy vehicles along its length. These characteristics include appropriate horizontal and vertical alignments, lane widths (12 feet wide), turning radii, sight distance, and auxiliary lanes with acceleration/deceleration lanes of sufficient length and storage (see Design Criteria Tables in **Appendix C-6** for more information about design characteristics). For example, all city street intersections would be designed to allow buses and SU-30 (single unit with three axles) trucks to turn at them, and highway ramps would be designed to accommodate WB-67 (53-foot tractor trailer) trucks. Under the Community Grid Alternative, Qualifying Highways, including BL 81 and interstate system roadways, and designated truck access routes, including local roadways, are subject to change from the existing condition. These changes are identified in **Appendix B-5**.

- C 4-44: The BL 81 designation will encourage high speed traffic. Eliminate the designation.
- R 4-44: A variety of different speed limits will be established along the BL 81 corridor consistent with how the transportation system will function. Freeway sections will allow vehicles to move at 65 mph, whereas downtown sections of BL 81 will be posted at 30 mph. The Business Loop designation allows the speed to be adjusted for high speeds on the freeway, and low speeds through Downtown.
- C 4-45: In addition, the business loop designation is not appropriate for the Community Grid Alternative since it does not promote through transportation, but rather discourages it.
- R 4-45: The BL 81 designation would apply to remaining segments of the current I-81 corridor south of the New York, Susquehanna and Western Railway bridge and north of I-690, Almond Street, Erie Boulevard, Oswego Boulevard, and Pearl Street to form a continuous route between existing Interchanges 16A and 29.
- C 4-46: Extend the Community Grid Alternative farther south, perhaps as far south as I-481, to improve connectivity between the Southside and Eastside neighborhoods and provide better access from the Southside to University Hill and hospitals. Otherwise, the proposed BL 81 perpetuates the divide between these areas that exists today. Lowering this segment of BL 81 would allow street-level intersections at Colvin Street and Brighton Avenue to better connect traffic to Southside neighborhoods and businesses.
- R 4-46: Features of the Community Grid Alternative that would enhance vehicular connectivity for neighborhoods and businesses in the Southside, as described in **Sections 3.4.3, 6-2-1, and 6-3-2** of the DDR/DEIS and FDR/FEIS, include the new northbound BL 81 exit ramp to Colvin

¹ STAA vehicles are tractor trailer combinations greater than 65 feet, tractors with 28-foot tandem trailers, maxi-cubes, triple saddle mounts, stinger-steered auto carriers, and boat transporters.

Street, which would improve highway access to the southern Southside/Brighton and Outer Comstock neighborhoods; the new interchange at East Glen Avenue, which would be relocated, improving access to the Brighton Road area; and the maintenance of existing I-81 Interchange 17 at South State Street. Lowering this segment of BL 81 to create at grade, signalized intersections would further increase travel times to and from destinations to the south and divert additional traffic to the new I-81 (existing I-481).

- C 4-47: An old entrance to Oakwood Cemetery used to exist with a beautiful stone arch that entered the cemetery. Inside the cemetery is architecture from JL Silsbee. This should be preserved and re-introduced to beautify the city and connect the cemetery with the residents who live directly west of it. Extend the Community Grid Alternative southward to again allow access to the main gate. While the Cemetery's administration has expressed that they do not have an interest in restoring the historic main entrance gate at this time, the Project should be designed so that future administrations could open the entrance if they wish.
- R 4-47: The Community Grid Alternative includes a new northbound exit from BL 81 to Colvin Street, which would improve access to Oakwood Cemetery. Other changes in access to and visibility of Oakwood Cemetery are beyond the scope of this Project and are not under consideration. However, implementation of the Community Grid Alternative would not preclude others from making improvements to the grounds of the Oakwood Cemetery as part of an independent, future action.

4-4 BL 81 – SOUTHERN SEGMENT (SOUTH OF I-690)

COLVIN STREET

- C 4-48: Create a new northbound exit from BL 81 to East Colvin Street to help improve access to Southside areas and businesses, as well as help diffuse local traffic bound for Syracuse University.
- R 4-48: As described in **Section 3.4.3**, a new northbound BL 81 exit ramp to Colvin Street has been included in the Community Grid Alternative.
- C 4-49: The proposed new ramp at Colvin Street will greatly improve access for Brighton and Outer Comstock. It will enhance access for the Southside and disperse traffic into the city.
- R 4-49: The new northbound BL 81 off-ramp at Colvin Street will improve access to Brighton, the Southside, and Outer Comstock neighborhoods, as well as Syracuse University.
- C 4-50: Consider a full interchange at BL 81 and Colvin Street. Currently, there's a northbound exit and a northbound entrance, but there is nothing for the southbound part.
- R 4-50: Under the Community Grid Alternative, a new northbound exit ramp from BL 81 to Colvin Street would be built. The existing northbound entrance ramp would remain, and a new traffic signal would be installed where the northbound ramps intersect Colvin Street, as described in

Section 3.4.3 of the DDR/DEIS and FDR/FEIS. The existing southbound entrance and exit ramps at South State Street/South Salina Street/Brighton Avenue (Interchange 17), about 0.5 miles south of Colvin Street, would be maintained. Preliminary studies evaluated the conversion of the Colvin Street partial interchange (with only one ramp) to a full interchange (see **Appendix A-6**). It was determined that the addition of a southbound exit ramp and southbound entrance ramp was not feasible. While both southbound entrance and exit ramps at Colvin Street were considered, a full interchange there would not be feasible due to the proximity to the adjacent exit ramp and numerous property impacts.

- C 4-51: With the new northbound BL 81 exit to Colvin Street, the volume of traffic should increase as commuters head to the Syracuse University campus area. Clarify if any improvements would be made to Colvin Street to handle this traffic.
- R 4-51: A traffic signal on Colvin Street, at its intersection with the new northbound I-81 exit ramp, would be included as part of the Project. Projected traffic volumes do not warrant further improvements to Colvin Street. The City of Syracuse has a separate project in the Transportation Improvement Program to upgrade the Colvin Street corridor within the next few construction seasons.
- C 4-52: The new northbound exit ramp to Colvin Street, intended for people coming to Syracuse University, allows for single-lane eastbound traffic to Comstock Avenue. This will lead to bottlenecks especially during special events at the Carrier Dome.
- R 4-52: As discussed in **Section 5.6.1**, total trips to and from Syracuse University and Dome events would be similar under the No Build and Community Grid Alternatives. Delays experienced during special events are largely associated with bottlenecks formed at the exit points at event parking facilities due to internal circulation within the parking facilities and the intersections at major exit points. Current delays at sporting events would be similar under the Community Grid Alternative as existing conditions because the Project does not propose altering parking access points or the internal circulation within the major parking facilities. The Community Grid Alternative would allow more opportunity to leave the University Hill area by providing new direct access points to I-690 on Crouse Avenue and Irving Avenue and to BL 81 on Van Buren Street.

MLK, JR. EAST AND VAN BUREN STREET

- C 4-53: Please move forward with a roundabout at MLK, Jr. East. It would have substantial safety benefits. The roundabout will slow traffic, and placing it near a school will be useful, not harmful. If you move it, do not move it too far away as to limit its benefits on the school.
- R 4-53: As stated in **Section 3.4.3**, based on public input, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East under the Community Grid Alternative. Instead, NYSDOT is proposing a roundabout at BL 81 and Van Buren Street.

- C 4-54: Do not include a roundabout in the project's design. They are confusing for drivers. We do not need another Carrier Circle in Syracuse.
- R 4-54: Low-speed modern roundabouts, such as the one proposed as part of this Project at Van Buren Street, and high-speed traffic circles, such as Carrier Circle, differ substantially. Carrier Circle has an outdated 70-year-old design with high-speed and ineffective merges; it has two- to three-lane configurations with five "legs" (entrances/exits); and it has an approximately 600-foot inside diameter. In contrast, the proposed roundabout at Van Buren Street would be designed to modern standards with slow speed and traffic calming characteristics, one- to two-lane configurations with three "legs" (entrances/exits), and a substantially smaller inside diameter than Carrier Circle. These characteristics of a modern roundabout improved their maneuverability.
- C 4-55: Do not include a roundabout at BL 81 and MLK, Jr. East. A roundabout at this location would impact the safety of children and families accessing the Dr. King Elementary School.
- R 4-55: As stated in **Section 3.4.3**, based on public input FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East. Under the re-designed Community Grid Alternative presented in this FDR/FEIS, BL 81 would not connect to MLK, Jr. East. MLK, Jr. East would connect to Leon Street, and the portion of MLK, Jr. East beyond Leon Street would become a driveway to the school's parking lot.
- C 4-56: Because of safety concerns associated with the proposed roundabout near Dr. King Elementary School, consider alternatives to the roundabout including adding a signal at the roundabout, adding a second roundabout at Colvin Street, or moving the roundabout further south and adding traffic calming measures on BL 81 such as speed bumps, cameras, and reduced lane widths.
- R 4-56: Based on public input, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East (see **Section 3.4.3** of this FDR/FEIS). Nationwide data supports the conclusion that modern roundabouts in residential neighborhoods operate safely. Traffic signals are not necessary for the operation of roundabouts, which have been successfully implemented throughout the state. A modern roundabout is designed so that the fastest a motorist could drive through it would be approximately 20-30 mph. Enforcement of speeds is the responsibility of the police department.
- As detailed in **Section 3.4.3**, several traffic calming measures have been incorporated into the Project. As the highway approaches the city, posted speeds would decrease gradually, reaching 30 mph prior to MLK, Jr. East. In addition, the highway would be designed with traffic calming measures, such as S-curves and other physical features, to slow down motorists.
- Refer to the response to **Comment 4-61** about relocating the roundabout south of MLK Jr., East.
- C 4-57: BL 81 must be located farther from Dr. King Elementary School.

- R 4-57: Moving BL 81 farther east would be problematic from an engineering perspective due to the location of the rail line and hill. However, the design of the Community Grid Alternative was refined after the publication of the DDR/DEIS so that BL 81 would not connect to MLK, Jr. East. Furthermore, the alignment of BL 81 would be moved to the east away from Dr. King Elementary School and adjacent to the New York, Susquehanna and Western Railroad.
- C 4-58: Avoid new access from BL 81 to MLK, Jr. East so that children are protected from traffic.
- R 4-58: As stated in **Section 3.4.3**, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East. In addition, the Community Grid Alternative has been re-designed without a vehicular connection between BL 81 and MLK, Jr. East.
- C 4-59: We should be slowing down to 20 mph for the Dr. King Elementary School. There should be no business loop or qualified highway going near that area, along Almond Street, and particularly near the school. Lanes should be eleven feet to slow down traffic.
- R 4-59: As stated in **Section 3.4.3**, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East. See response to **Comment 4-63** with respect to traffic calming measures that would be implemented to encourage slower speeds. See response to **Comment 4-43** regarding the designation of the qualifying highway, business loop, and lane widths.
- C 4-60: As an option to mitigate impacts of the proposed roundabout, the Dr. King Elementary School could be relocated as part of Blueprint 15 and Syracuse Surge, with the existing school building re-purposed. Federal community benefit and mitigation funds could be used for this purpose.
- R 4-60: The DDR/DEIS and FDR/FEIS did not identify a need to relocate the Dr. King Elementary School.
- C 4-61: Relocate the proposed roundabout to Brighton Avenue, Colvin Street, Oakwood Avenue, or other locations farther south than the proposed location at MLK, Jr. East.
- R 4-61: NYSDOT considered moving the roundabout farther south to Colvin Street and Brighton Avenue, but the distance from these intersections to the 30 mph section a few hundred feet south of MLK, Jr. East was too far and would allow motorists to accelerate rather than maintaining reduced speeds. NYSDOT did not consider Oakwood Avenue as it currently does not connect with I-81. NYSDOT considered a roundabout at East Kennedy Street, which is south of MLK, Jr. East, but it would be very close to existing homes. Therefore, NYSDOT chose to locate the roundabout at Van Buren Street.

- C 4-62: If the roundabout is moved south of MLK, Jr. East, it will increase travel time.
- R 4-62: Moving the roundabout south would increase travel time, and therefore as stated in **Section 3.4.3** of this FDR/FEIS, the design of the Community Grid Alternative now includes a roundabout at Van Buren Street instead of at MLK, Jr. East.
- C 4-63: NYSDOT has stated that the roundabout could not be moved to Colvin Street or Brighton Avenue because traffic would have too much opportunity to speed up on the unsignalized section of BL 81 between the roundabout and Van Buren Street. Similarly, relocating the roundabout to Van Buren Street would allow traffic to pass Dr. King Elementary School at high speeds. This could be prevented with simple safety measures such as speed bumps, speed cameras, narrower lanes, and other traffic calming measures.
- R 4-63: Traffic calming measures would be implemented on BL 81 between Colvin Street and just south of MLK, Jr. East to encourage motorists to reduce speeds from 55 mph to 30 mph. These measures include gradually reduced posted speed limits and physical alterations to BL 81, such as fewer lanes, narrowed shoulders, roadway curves, and curbing. Both northbound and southbound BL 81 would transition from three lanes to two lanes north of Colvin Street. During final design NYSDOT will explore the introduction of urban landscaping treatments and other visual cues to further convey to motorists that they are transitioning from a freeway to a city street and vice versa. Refer to the response to **Comment 4-61** with respect to not moving the roundabout south of MLK, Jr. East.
- C 4-64: Include signage at the roundabout that clearly indicates how traffic should flow.
- R 4-64: Signage for the Community Grid Alternative, including the roundabout, would be in accordance with the latest version of the *Manual of Uniform Traffic Control Devices* as well as FHWA and NYSDOT signage policy.
- C 4-65: The roundabout in Ithaca where Spencer Street, Albany Street, Elmira Road, and Park Street meet would provide a good reference for safety of a roundabout in a residential neighborhood.
- R 4-65: Comment noted.
- C 4-66: Consider additional roundabouts in the Project's design.
- R 4-66: NYSDOT may consider additional roundabouts in final design.

MONROE AND MADISON STREETS

- C 4-67: Include a traffic signal and a crosswalk at Monroe Street and Madison Street.
- R 4-67: Pedestrian-activated signals at Monroe and Madison Streets will be considered during final design.

ADAMS AND HARRISON STREETS

- C 4-68: Please realign Harrison Street where it intersects Almond Street to remove the existing "jog" in the roadway. With the elimination of the viaduct and the introduction of the new Couse and Irving Avenues interchange, there is opportunity to realign Harrison Street.
- R 4-68: Elimination of the jog on Harrison Street was not considered as part of this Project. It was not considered necessary because it does not adversely affect the street's safety or operations. In addition, straightening this portion of the street would require additional right-of-way acquisition. Harrison Street would be converted from a one-way street to a two-way street west of Almond Street.
- C 4-69: Adams Street and Harrison Street create physical barriers between the East Adams Street neighborhood and Downtown. There should be a study of ways to reconnect the Southside neighborhoods with Downtown by improving the pedestrian and human scale aspects of these corridors, such as increasing the width of the pedestrian realm, reducing the pedestrian crossing width, and reducing driving lane widths. (If this is not possible in the NYDOT funded projects it could be coordinated as a related City project.)
- R 4-69: Under the Community Grid Alternative, all pedestrian ramps, pedestrian signal systems, and crosswalks at the Harrison and Adams Streets intersections would be replaced to current design standards. Harrison Street would be reduced from five lanes in one direction to a total of four lanes (two in each direction), thereby reducing pedestrian crossing width. In addition, the extra space along Harrison Street between Almond and Townsend Streets would be used to construct a cycle track and wider sidewalks on both sides of the street, which could be extended by the city in a separate project. At Adams Street, the existing four to five eastbound lanes would be reconfigured to a total of four lanes (two each way); however, the overall width would not change substantially. The two-way conversion of Adams Street is consistent with the city's one- to two-way street conversion initiative. The proposed design for Adams Street (outside of the lanes needed to accommodate travel demand) could be further refined during final design in coordination with the city, consistent with the Project's needs and objectives and the city's vision.

ALMOND STREET LANE WIDTH/DESIGN ISSUES

- C 4-70: Almond Street must not be a wide street that encourages high speed traffic. Make Almond Street narrower and with slower speeds, medians and landscaping treatments, and pedestrian and bicycle amenities.
- R 4-70: While its width would vary along its length, Almond Street has been designed with the minimum number of lanes, including turning lanes at intersections (where needed), to accommodate projected traffic volumes at an appropriate level of service. On-street parking, widened sidewalks, a landscaped median, and cycle tracks and shared use (bicycle and pedestrian) facilities would enhance the corridor and provide traffic calming. A proposed

roundabout would be installed at Van Buren Street, where Almond Street would begin, which would be a traffic calming measure, and additional traffic calming measures would be implemented north of Colvin Street to MLK, Jr. East to encourage motorists to reduce their speed. Almond Street/BL 81 would have a posted speed limit of 30 mph, consistent with other City streets.

C 4-71: The redesign of Almond Street is too wide with too many lanes. Traffic lanes should be no more than 11 feet wide, and the speed limit should be no more than 30 mph. This will promote safety and reduce emissions. Almond Street should not look like another Erie Boulevard. The proposed width of Almond Street should be reduced from 197 feet to 112 feet to free up more land for potential development. This additional width would also allow future developments to conform with setback requirements in the City of Syracuse zoning code. Further, the additional land would provide a temporary 85-foot-wide strip of land for use by the Contractor during construction. The City could set up a development corporation like Rochester and Milwaukee did to take possession of the excess NYSDOT land, establish redevelopment goals and guidelines, and sell it to developers to fulfill those goals.

R 4-71: Design criteria for all streets affected by the Project were established based on NYSDOT Highway Design Manual and AASHTO standards, the functional classification of the facility, the design speed, and the projected traffic volumes. Refer to the Design Criteria tables in **Appendix C-6**. Under the Community Grid Alternative, BL 81 would be designated as a Principal Urban Arterial and a Qualifying Highway. The proposed de-designation of I-81 in Syracuse necessitates the identification of an alternate route that could accommodate truck traffic (Qualifying Highways). To continue to serve freight destinations in Syracuse's Downtown, BL 81 is proposed to be part of the National Network. Critical design elements, including lane widths, for these functional classifications must meet the minimum criteria established by the NYSDOT Highway Design Manual, Chapter 2. FHWA mandates that the minimum lane width for Qualifying Highways is 12 feet (see Design Criteria Tables in **Appendix C-6** for more information about design characteristics). The design criteria for this Project have been established in consideration of NYSDOT's Context Sensitive Design concept, which strives for outcomes that meet transportation service and safety needs as well as environmental, scenic, aesthetic, cultural, natural resource, and community needs.

In addition, the Project includes extensive pedestrian and bicycle accommodations, also designed to meet the recommended design standards, which would result in improved pedestrian and bicycle accommodations and safety.

While its width would vary along its length, Almond Street has been designed with the minimum number of lanes, including turning lanes at intersections (where needed) to accommodate projected traffic volumes at an appropriate Level of Service. On-street parking, widened sidewalks, a landscaped median, and cycle tracks and shared use (bicycle and pedestrian) facilities would enhance the corridor and provide traffic calming, and additional traffic calming measures would be implemented on BL 81 north of Colvin Street to MLK, Jr. East to encourage motorists to reduce their speed. A proposed roundabout would be installed

at Van Buren Street, which would also act as a traffic calming measure. Almond Street/BL 81 would have a posted speed limit of 30 mph, consistent with other City streets.

NYSDOT will work with the City of Syracuse and appropriate stakeholders during the final design phases to refine the design of the areas of Almond Street outside the curb lines, including widths of the medians and pedestrian refuge areas, cycle track, shared use lanes, and sidewalks, etc. The refinements to Almond Street would be designed to be consistent with the City's vision and the needs and objectives of the Project.

- C 4-72: Reduce the footprint of roadways through the city anywhere possible by keeping traffic lanes narrow and curvatures less wide to reduce vehicle speeds, improve pedestrian safety, and allow more room for development and greenspace.
- R 4-72: Lane widths are established in accordance with the NYSDOT Highway Design Manual based on the functional classification of each street (refer to design criteria tables in **Appendix C-6**). In those cases where there is some flexibility in the design criteria, such as low-volume city streets, NYSDOT will work with the city to determine their appropriate width during final design while still meeting the minimum width stated in the design criteria.
- C 4-73: The Community Grid Alternative does not appear to include shoulders along Almond Street through the city. The roadway must be made wider to accommodate lane closures from accidents or breakdowns, and to allow for snow storage in winter.
- R 4-73: Shoulders or breakdown lanes along Almond Street/BL 81 are not needed or usual along city streets. The design includes a buffer between the roadway and the sidewalk and would not present any impediments to snow plowing. BL 81 meets the design criteria for a Qualifying Highway, which is the designation that would be given to this street under the Community Grid Alternative. Refer to the response to **Comment 4-43** for more information about the Qualifying Highway designation.
- C 4-74: The proposed design of the Community Grid Alternative is undesirable. Walls will replace the viaduct, and the narrow roadway without shoulders will be unsafe. Also, there must be more landscaping within the proposed roundabout at MLK Jr., East.
- R 4-74: Noise walls are proposed along highway sections of BL 81 south of MLK Jr., East and north of I-690. Walls are not proposed within the section that would be an urban arterial. The noise walls would comply with NYSDOT design standards. BL 81 would have lane widths and shoulders that comply with NYSDOT design standards. Landscaping treatments along BL 81 would be refined as design advances. Regarding shoulders along Almond Street, please see response to **Comment 4-73**.
- C 4-75: BL 81 should be three lanes in each direction to accommodate the amount of north-south traffic that will use it.

- R 4-75: The Community Grid Alternative, including BL 81 and the new I-81 (existing I-481), has been designed with the appropriate number of lanes to meet travel demand. Improvements to existing I-481, as well as the design of BL 81, are described in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS. The number of lanes along BL 81 would vary and would include sections with three lanes in each direction. Where there are less than three lanes in each direction, additional lanes would not be required to provide acceptable levels of service.
- C 4-76: Do not provide new on-street parking as part of the Community Grid Alternative. A major goal of this project is to reconnect the east and west side of the city. By not allowing new street parking, you will encourage a much more walkable city and improve future development in those areas. It will also free up space for new development, green space, and more sidewalk and bike paths. This is a phenomenal opportunity to increase non-motorized transportation infrastructure within the city.
- R 4-76: Parking spaces are provided to support parking demand. On-street parking also acts as a buffer to the highway, encourages walkability, and contributes to traffic calming. The Project includes extensive improvements to bicycle and pedestrian amenities and connectivity.

OTHER ALMOND STREET DESIGN ISSUES

- C 4-77: Almond Street and other local streets are in ill repair. Will these streets be repaired under the Community Grid Alternative?
- R 4-77: Almond Street and east-west streets that cross beneath the existing viaduct would be reconstructed as part of the Community Grid Alternative. Crouse and Irving Avenues, West Street, Oswego Boulevard, Adams Street, Harrison Streets, and other local streets would be improved near their existing crossings with BL 81 and I-690.
- C 4-78: Access to Almond Street at Brighton Street would reduce pollution and noise when city speed limits are 45 mph and 30 mph into the city. The city must enforce them for safety and maximum benefit.
- R 4-78: Depending on the roadway jurisdiction, the enforcement of speeds is the responsibility of the City of Syracuse Police Department, New York State Police, and other area police departments.
- C 4-79: Clarify how the transition between Genesee Street and Almond Street will look around Forman Park.
- R 4-79: The alignment of Genesee Street would not change as part of the Community Grid Alternative, and Forman Park would not be altered. Genesee Street would intersect with the new Almond Street just west of the park where Genesee Street splits to separate eastbound and westbound roadways around the park. There would be a new north-south sidewalk and landscape buffer immediately west of the existing park. Refer to **Figure 3-28** of the DDR/DEIS and FDR/FEIS for more information.

- C 4-80: NYSDOT should provide a fence along the new Almond Street to protect children from running into traffic.
- R 4-80: Existing fences, such as the one near Pioneer Homes near East Adams Street or along Wilson Park, would either be maintained or rebuilt. New fences at locations that do not currently have them are not planned at this time.

WEST STREET

- C 4-81: The Community Grid Alternative will not adequately address congestion as currently planned. The traffic circle should be relocated closer to the hospitals, and West Street should be extended to University Hill.
- R 4-81: As presented in **Chapter 5** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative would operate efficiently to accommodate the projected traffic volumes in the Project Area. In addition, NYSDOT is no longer proposing a roundabout at MLK, Jr. East. A West Street concept, Alternative O-2, described in **Section 3.2.6** of the DDR/DEIS and FDR/FEIS, was considered during the Project's scoping phase. This potential alternative would require a substantial amount of property acquisition, which is considered unreasonable. In addition, Alternative O-2 would substantially diminish local street connections in the West Street corridor, thereby failing to meet the Project's objective to "maintain or enhance the vehicular, pedestrian, and bicycle connections in the local street network within and near Downtown Syracuse to allow for connectivity between neighborhoods, business districts, and other key destinations." For these reasons, Alternative O-2 was dismissed from further consideration.
- C 4-82: The right turn off Seymour Street onto West Onondaga Street should be removed, the extra lane buried, and that area converted to green space. The dedicated turn was put in decades ago to make it easier to move traffic from northbound I-81 to westbound I-690, but the connection was never completed. Removing this turn will make it much easier for pedestrians to walk from downtown to the West Onondaga Business District.
- R 4-82: This location is outside the Project limits. However, the proposal could be undertaken as a separate project.

4-5 BL 81 – NORTHERN SEGMENT (NORTH OF I-690)

- C 4-83: The addition of a fourth lane to the northern section of BL 81 and the related changes to existing bridges are not needed.
- R 4-83: From I-690 to Hiawatha Boulevard, I-81 has three lanes in each direction. Widening this segment of the highway to provide four through lanes in the northbound direction is needed to improve capacity and traffic operations. The southbound section would be maintained with three lanes (see **Figure 3-44** of the DDR/DEIS and FDR/FEIS). Several non-standard highway features, such as narrow shoulders, tight curves, and reduced sight distance, also would be corrected.

- C 4-84: Consider extending the city street portion of the Community Grid Alternative north to Destiny USA. Remove the highway segment between I-690 and Destiny USA. However, the highway could remain between the New York State Thruway and Destiny USA so there is a highway option to reach the mall.
- R 4-84: Removal of the freeway between I-690 and Hiawatha Boulevard would be infeasible as it would be physically impossible to add the required number of lanes to north-south city streets to accommodate the volume of traffic that would use this section of BL 81.
- C 4-85: Many of the proposed changes north of I-690 in both plans have not been thoroughly circulated in the media and are recently introduced. Please remove these three features in both plans:
- Northbound I-81 off-ramp to Court Street should remain: Eliminating this ramp in both plans serves no purpose. It will cost more money to demolish it and re-plant than it is to keep it and resurface it. It can remain the Franklin Square entrance route for those traveling on westbound I-690 or northbound I-81/BL 81 without having the inefficiencies of going up to Bear Street and back-tracking to Franklin Square.
 - Northbound I-81 ramp to northbound Butternut Street should remain: There is significant northbound traffic from Franklin Square and other northern parts of the city. Throw the computer models away, Consolidating all the entrances to 81 in this area farther south at Pearl Street is an ineffective strategy and is counter to the “grid” philosophy. If we want to disperse traffic, we should offer multiple opportunities to enter northern 81 from Downtown, we should keep the same number of on-ramps, or increase them from different city blocks, not decrease them.
 - Genant Drive to southbound I-81 should remain: This is a common exit route for those who live and work in Franklin Square.

Travel time estimates to/from Franklin Square have not been completed with the proposed changes. Therefore, all changes that remove or create farther distance to access to this area should be reconsidered. West Street is a common gateway for many to Franklin Square, and it is eliminated under both plans.

Those changes will delay access to Franklin Square and put more traffic on these three other areas. Adding new impediments related to the neighborhoods connections to 81 should be abandoned. Causing everyone to go down to Pearl Street, or up to Bear Street adds needless delay and impedes traffic flow. Both plans as they are currently designed right are to the detriment to one of the city’s most vital, growing neighborhoods.

- R 4-85: The northbound 81 exit ramp to Court Street would be relocated about one quarter mile north, where it would connect to the commercial Bear Street corridor instead of the residential area surrounding Sunset Avenue, in keeping with the premise that freeways are best served by connecting to collector roadways and removing traffic from residential streets. Because of high crash rates and inadequate ramp spacing in this area, the northbound on-ramps from Butternut and Pearl Streets were consolidated to a single northbound on-ramp. The new ramp would meet current ramp spacing standards and improve safety. This would not be a

substantial change for motorists as the entrance to the Butternut Street ramp and the entrance to the Pearl Street ramp are less than a quarter of a mile apart. Finally, Butternut Street, which is a high-traffic connector corridor due to the existing ramp connection, would be re-characterized as a normal urban street with improved pedestrian and bicycle connectivity. The on-ramp from Genant Drive experiences a high crash rate and is too close to the off-ramp to Clinton Street/Oswego Boulevard. Therefore, it would be relocated to North Clinton Street, approximately one half of a mile away. The West Street bridge over West Genesee Street would be removed, creating an at-grade intersection street. Motorists would connect to and from Franklin Square via West Street using surface city streets (e.g., West Genesee and North Franklin Streets) rather than high-speed flyover ramps, thereby restoring West Street to a city street rather than a high-speed freeway connection.

- C 4-86: Continue to evaluate how to best connect the streets of the Southside, University Hill, and the old entrance to Oakwood Cemetery to the north side of Syracuse. It is unclear how the proposed boulevard would connect from the south side of I-690 to the north side where most of the original I-81 would still be used. Right now, the highway is above that area. Can it be dropped, instead of using Erie Boulevard and State Street/Pearl Street, etc.?
- R 4-86: See response to **Comment 4-47** regarding Oakwood Cemetery. Both Oswego Boulevard and Pearl Street (BL 81) would pass beneath I-690 before transitioning back to a freeway. Lowering I-690 to surface would not be reasonable from a traffic flow perspective with the Community Grid Alternative.
- C 4-87: The Community Grid Alternative should include bicycle and pedestrian improvements near the Pearl Street ramp.
- R 4-87: Under the Community Grid Alternative, the Pearl Street/Willow Street intersection would be improved. The existing signal and crosswalks would be replaced, and pedestrian signals would be provided throughout this area.
- C 4-88: Will the four-way split (Salina Street, Clinton Street, Franklin Street, West Street exits) still exist to get from the north to Downtown on southbound BL 81? If so, can the same approach be given to the south side of the city as well? It's a great solution to congestion and will help move traffic efficiently.
- R 4-88: Existing Interchange 19 (Clinton Street/Salina Street) and existing Interchange 20 (Franklin Street/West Street) would be combined into one interchange to improve operations and safety. This would involve replacing the existing off-ramps from the highway to West Street/Franklin Street (Interchange 20) and to Clinton Street/Salina Street (Interchange 19) with a single ramp that serves Clinton Street/Franklin Street and Oswego Boulevard. The new interchange would receive a new exit number.
- C 4-89: The Community Grid Alternative improves access to much of the city, but it reduces access to Northside for westbound traffic on I-690. With access from Townsend and Court Street

removed, vehicles are left with Crouse Avenue and Bear Street as their access to Northside. This will hurt access to Northside businesses.

- R 4-89: Access to Northside would still be provided. The two existing exit points (on Townsend and Court Streets) would be replaced by two new exit points (at Crouse Avenue and Bear Street). While the spacing between the new ramps would be increased slightly from the spacing between the existing ramps (from 1.2 to 1.9 miles), the relocation of the exits would improve interchange spacing, lengthen acceleration and deceleration ramps, and improve merging. These improvements would help reduce the high crash rates in this segment of the roadway.
- C 4-90: There must be good signage that directs traffic to use BL 81 to reach Destiny USA and the hospitals.
- R 4-90: NYSDOT has developed conceptual signage at this stage of preliminary design. As the project progresses into the final design phase signage directing traffic to destinations along BL 81 would be further evaluated.
- C 4-91: There needs to be improved access from the west side of Syracuse to the portion of BL 81 north of Syracuse.
- R 4-91: Additional improvement along the Bear Street corridor have been integrated into the Project to improve the connection between the west side of Syracuse to BL 81 in the Bear Street area. Additionally, the interchange modifications along BL 81 will provide more direct connections to and from Bear Street and the westbound on-ramp to I-690 is also being improved.
- C 4-92: The one-lane off-ramp from southbound I-81 to Destiny is riddled with potholes and should be repaired.
- R 4-92: NYSDOT has a capital project, separate from the I-81 Viaduct Project, that will address the deterioration of these bridge decks.
- C 4-93: There should be some consideration given to the below-clearance railroad bridge across Route 370 at Liverpool. This section of Route 370 (Onondaga Lake Parkway) feeds directly off northbound I-81 and is and has been subject to repeated bridge strikes by trucks and buses mistakenly exiting to Route 370, despite numerous warning signs and lights. This issue should be addressed as part of the Project because of the intimate connection of the Route 370 and northbound I-81. Some of these bridge strikes have involved fatalities. The current attempts to address this, with warning signs, lights, and alarms, has not solved the problem that results from low bridge clearance, and is not going to. The only solution is to remove the low-headroom issue.

- R 4-93: The bridge is owned by CSX, and any re-routing, realignment, or relocation of it would be under their jurisdiction. NYSDOT is studying alternative solutions as part of the Onondaga Lake Parkway Safety Project.
- C 4-94: The intersection of Onondaga Lake Parkway, Park Street, Buckley Road, and Old Liverpool Road with I-81 needs to be improved. These improvements would spur economic activity, make the entrance to the town more attractive, and by removing the divisions, make the area more pedestrian friendly.
- R 4-94: The Route 370 (Onondaga Lake Parkway) entrance ramp (Interchange 24A) and Old Liverpool Road entrance ramp (Interchange 24B) to southbound BL 81 would be consolidated into a single ramp (see **Sections 3.4.2** and **3.4.3**). Improvements at the 7th North Street/Buckley Road intersection are not required to meet the Project purpose and objectives or to address the identified transportation needs. Therefore, these improvements are not included in the Project.
- C 4-95: Please explain how the Community Grid Alternative will affect the Town of Salina, especially access to 7th North Street.
- R 4-95: BL 81 would continue to operate as a limited access high speed (65 mph) freeway as it functions today. Access from 7th North Street to BL 81 or the New York State Thruway would not change. Construction work in the Town of Salina would be limited to conversion of I-81 signage to BL 81 signage and creation of new and modified noise barriers along BL 81.
- C 4-96: The project limits extend north of the City of Syracuse into the Town of Salina. Please explain why this is necessary.
- R 4-96: There are no highway or interchange modifications proposed within the Town of Salina under the Viaduct or Community Grid Alternative. The Project limits extend through this area because new and modified noise barriers are proposed.

4-6 I-690 RAMPS AND OTHER IMPROVEMENTS

- C 4-97: The proposed Crouse Avenue/eastbound I-690 on-ramp needs improvements. It has created a farther distance from Downtown to get on to eastbound I-690. All traffic heading east on I-690 needs to use this on-ramp. Traffic needs to stay on Downtown streets longer. The section between Erie Boulevard and I-690 will be too small. Traffic will back up on the north-south roadway (i.e., Crouse Avenue). Traffic will also back up on Erie Boulevard East trying to take a left at the light, and it will need longer turn lane.
- R 4-97: The Project has been designed to accommodate travel demand. The I-690 interchanges at Crouse and Irving Avenues are a key part of the Community Grid Alternative and its ability to disperse traffic and provide a direct, efficient connection to University Hill. Under the Community Grid Alternative, traffic along the Erie Boulevard/Crouse Avenue intersection would operate at Level of Service (LOS) B in 2056.

- C 4-98: The Community Grid Alternative plans should not eliminate the West Street interchange with I-690. It serves as a quicker route than Clinton Street, Salina Street, or Franklin Street.
- R 4-98: The Community Grid Alternative would reconstruct the West Street interchange with I-690. Drivers would still have access to southbound West Street from I-690.
- C 4-99: NYSDOT must fix I-690 between West Street and South Midler Avenue, which is very dangerous. Lighting along this corridor must be improved.
- R 4-99: The Community Grid Alternative includes the reconstruction of I-690 between West Street and Beech Street, which will include new lighting to NYSDOT standards. The section of I-690 east of Beech Street east of the Teall Avenue interchange was recently reconstructed with lighting improvements. The segment of I-690 between the Teall Avenue interchange and South Midler Avenue is outside the Project limits; however, NYSDOT is currently rehabilitating the Thompson Road bridge over I-690 and, as part of that project, NYSDOT is improving lighting along I-690 from Teall Avenue to east of Thompson Road.
- C 4-100: The design of the Community Grid Alternative does not work. The north and south sections do not connect to I-690.
- R 4-100: The northern sections of BL 81 would provide direct connections for southbound BL 81 to eastbound I-690, and westbound I-690 with northbound BL 81. Eastbound I-690 traffic would connect with northbound BL 81 through Hiawatha or Bear Street. While Almond Street would not connect directly to I-690, connections are available at Crouse and Irving Avenues. Several city streets (e.g., Townsend, McBride, Salina, North Clinton, Franklin, State Streets, and others) would continue to connect the southern and northern portions of the city grid across the I-690 corridor. The disconnection of Almond Street to I-690 would encourage the dispersal of traffic and provide more direct connections to the two major destinations, Downtown and University Hill. If an I-690 motorist's destination is southbound BL 81, they could use West Genesee Street/Erie Boulevard to access Almond Street. The West Street/West Genesee intersection would be improved as the grade separation between West and West Genesee Streets would be eliminated.
- C 4-101: You can enter I-690 from West Street, but you cannot exit at the next interchange. Consider a service road to connect these interchanges or some alternative design.
- R 4-101: If a motorist enters eastbound I-690 from West Street, the next exit would be at Irving Avenue; if entering westbound I-690 from West Street, the next exit would be North Geddes Street.
- C 4-102: Connections between eastbound I-690 and northbound I-81, and between southbound I-81 and westbound I-690 at the I-690/I-81 interchange (sometimes referred to as the "missing connections" or "common features"), should be included with the Project. Explain why they are proposed for the Viaduct Alternative and not the Community Grid Alternative. The proposed improvements to Bear Street are not an acceptable solution.

R 4-102: NYSDOT analyzed both full and partial BL 81/I-690 interchange options under the Community Grid Alternative to identify the advantages and disadvantages. The full BL 81 interchange option would introduce additional non-conforming features (ramp spacing) and conflict points (merge/diverge areas) on the freeway system. These features, in conjunction with the additional interchange traffic attracted by the ramps, would result in a lower Level of Service on the freeway. Moreover, NYSDOT analyzed the operations and capacity of Bear Street and Hiawatha Boulevard and found that these roadways would operate safely and efficiently with minor improvements under the Community Grid Alternative. The westbound I-690 on-ramp from Bear Street would be lengthened, and operational improvements would be made on Bear Street. These improvements include widening of select portions of Bear Street and its intersections, addition of raised medians to prevent turns at some locations (e.g., at Van Rensselaer Street and Liberty Street), addition of left and right turn lanes at specific locations (e.g., Spencer Street and Clinton Street), sidewalk improvements, and relocation of a portion of the Empire State Trail connection between Van Rensselaer Street and the Onondaga Creekwalk. These improvements would address issues at high crash locations and ensure that these routes would continue to function safely and efficiently in the future without providing additional direct connections between BL 81 and I-690 (see **Appendix A-1**). In addition, the full interchange option would require the full acquisition and demolition of up to seven more buildings than the partial interchange option, resulting in greater employee displacement, and would result in visual impacts. For these reasons and others cited in **Section 3.4.3** and the Access Modification Report (refer to **Appendix A-6**), and in consideration of public input, the full interchange option for the Community Grid Alternative was dismissed.

C 4-103: The I-690 and Route 695 interchange at the NYS Fairgrounds should be improved.

R 4-103: This proposal is outside the scope of the I-81 Viaduct Project. However, the I-81 Viaduct Project does not preclude NYSDOT from progressing transportation improvements at this location in the future.

4-7 BICYCLE, PEDESTRIAN, AND OTHER IMPROVEMENTS TO LOCAL STREETS

BICYCLE AND PEDESTRIAN IMPROVEMENTS

C 4-104: The Community Grid Alternative must include accommodations for pedestrians and bicyclists.

R 4-104: As discussed in **Sections 3.4.3** and **5.6.2** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative would include extensive pedestrian and bicycle accommodations, designed to meet the recommended design standards, which would result in improved pedestrian and bicycle accommodations and safety throughout the Project limits. In total, the alternative would result in approximately 12.5 miles of new or reconstructed sidewalks, 2.0 miles of new or reconstructed shared use (bicycle and pedestrian) paths, one mile of new cycle track (a separate track for bicyclists only), and 1.7 miles of new or reconstructed shared vehicle and bicycle lanes.

All bicycle facilities are designed to meet or exceed the American Association of State Highway Transportation Officials' Guide for Development of Bicycle Facilities 2012 Fourth Edition and New York State Complete Streets legislation. The Community Grid Alternative is also designed in accordance with the Syracuse Bike Plan, a section of the Syracuse Comprehensive Plan 2040, which lays out a detailed vision for an interconnected bike network throughout the City. This Project builds on the City's bike network, which provides connectivity between neighborhoods, Downtown Syracuse, and other key destinations. Where the Project offers opportunities to make enhancements consistent with the Syracuse Bike Plan, more bicycle facilities are provided, including the facilities on Almond Street and additional Creekwalk segments and connections. While the Project does not include the full construction of the bicycle network proposed in the Syracuse Bike Plan, proposed pieces included as part of the Project would serve as critical segments of the City's expanded bike network. These segments could potentially be extended as part of future, independent projects.

- C 4-105: NYSDOT should engage leaders in the Disability Advocacy community to receive input on design measures to accommodate people with disabilities. Organizations that should be contacted include Disabled in Action (DIA), Access CNY, ARISE, Aurora, and the Syracuse Chapter of the National Federation for the Blind.
- R 4-105: Final design plans for the Project will abide by all pertinent federal and state accessibility bicycle, pedestrian, and traffic signal guidelines. These include Public Rights-of-Way Accessibility Guidelines and the Highway Design Manual Chapter 18 (Pedestrian Facility Design).
- C 4-106: The Community Grid Alternative must include pedestrian safety measures along Almond Street.
- R 4-106: The Community Grid Alternative has been designed to meet the Project's purpose and objectives, including addressing geometric and operational deficiencies of pedestrian facilities in the Project limits and maintaining or enhancing pedestrian connections in the local street network within the Project limits in and near Downtown Syracuse to allow for connectivity between neighborhoods, business districts, and other key destinations. Discussion of proposed pedestrian accommodations under the Community Grid Alternative is found in **Sections 3.4.3 and 5.6.2** of the DDR/DEIS and FDR/FEIS. Streets would be designed to meet Public Rights-of-Way Accessibility Guidelines and comply with New York State Complete Streets requirements.
- C 4-107: Add pedestrian bridges or tunnels along Almond Street to safely accommodate pedestrians without impacting traffic flow. A covered pedestrian bridge at Adams Street would also facilitate safer pedestrian access between Downtown and University Hill.
- R 4-107: The Project includes objectives to "address vehicular, pedestrian, and bicycle geometric and operational deficiencies within the Project limits" and "maintain or enhance the vehicular, pedestrian, and bicycle connections in the local street network within the Project limits in and

near Downtown Syracuse to allow for connectivity between neighborhoods, business districts, and other key destinations.” Pedestrian bridges would not be necessary as most intersections along Almond Street (BL 81 under the Community Grid Alternative) would be signalized with crosswalks and other pedestrian safety amenities, such as median refuge areas and corner bump-outs to shorten crossing distances. Moreover, pedestrians generally prefer at grade crossings, as they provide a quicker and more direct route. At grade crossings are also highly visible, whereas separated crossings can be perceived to have security concerns because they are removed from the roadway. For these reasons, even when overpasses are provided, many pedestrians continue to cross at grade and need to be accommodated safely. A signalized pedestrian crossing would be provided at the intersection of Adams Street and Almond Street. See **Appendix A-1**, which contains the plans depicting all proposed street improvements.

- C 4-108: Improve pedestrian access between the east and west sides of BL 81 in the Southside neighborhood to provide better access to shopping and food stores for older residents and disabled persons. Current designs must be updated to include access points that will allow residents to easily travel to the business loop, local hospitals, educational institutions, and grocery stores.
- R 4-108: As explained in response to **Comment 4-105**, streets would be designed in accordance with all pertinent federal and state accessibility pedestrian and bicycle guidelines. Under the Community Grid Alternative, east-west routes would include intersections along Almond Street, such as Harrison Street, Adams Street, and others. Under the alternative’s current design, pedestrians would not be able to cross east-west at Monroe Street and Madison Street because of the presence of a median there; however, pedestrian-activated signals at these streets will be considered during final design. Additional information on the Community Grid Alternative is provided in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS.
- C 4-109: The Community Grid Alternative includes sharrows in various locations where vehicles and bicycles would share travel lanes. Sharrows are unsafe and should be removed.
- R 4-109: While separate bicycle amenities are preferred, in some instances the available right-of-way cannot accommodate them. In these cases, NYSDOT has provided shared vehicle and bicycle lanes. NYSDOT will continue to work with the city to determine the locations and appropriateness of these shared lanes.
- C 4-110: Where the proposed bicycle path crosses between the east and west sides of Almond Street, cyclists should not be required to dismount and walk across the street with pedestrians.
- R 4-110: The type of intersection control may vary depending on the type of facility (e.g., cycle track, shared use path, on-street bike lane, or shared lane), and in general, bicyclists would need to obey the same intersection controls as vehicles. At cross streets along Almond Street, cyclists would likely have the option to ride across the street with vehicle traffic where crosswalk designs provide adequate space for both bicycles and pedestrians to cross safely. The

specific signing and requirements would be determined for each intersection during final design as part of the detailed intersection and signal design and would be done in accordance with the New York State Highway Design Manual, Chapter 17, Bicycle Facility Design and the AASHTO Guide for the Development of Bicycle Facilities.

- C 4-111: NYSDOT has added what they call “shared paths” in a number of places like the path to nowhere discussed above. These are concrete walks ranging from 10 feet to 14 feet wide which run parallel to BL 81 in most cases where this is both the walking sidewalk and the bike trail combined (no separate bike trail). The most prominent of these shared paths runs from the MLK Drive sidewalk along the west side of the new BL 81 up to Adams Street. There is also a 10-foot-wide shared path (people and bikes) crossing the new bridges at East Glen Avenue and Butternut Street and several other places.

When the combined path gets to Adams Street, it separates to both sides of the street. On the west side of Almond Street (BL 81), there is now a 10-foot-wide bike lane going south separated by 14 feet of grass from an 8-foot-wide sidewalk, and the same on the east side of Almond where there is a 10-foot bike lane going in the north direction plus an 8-foot sidewalk separated by 14 feet of grass.

The issue here is safety. But it is clearly marked off into three (4') foot sections--the west side for walkers, the middle side for southbound bikers, the east side for northbound bikers. I have been on this trail, and it appears quite safe. The Onondaga Lake walking and biking trails/paths on the upper east side of the lake are clearly delineated where bikers must stay on the road portion and are not allowed on the walking path. A bike going 15 miles an hour coming up behind an unsuspecting walker can cause a very bad accident. Once again, personal injury attorneys salivating. Please consider combined paths that are marked and 12 feet wide.

- R 4-111: The width of the shared use paths as currently proposed would be sufficient to accommodate the anticipated use; however, if needed in the future, striping to delineate bicycle and pedestrian segments could be considered.
- C 4-112: Repair pedestrian infrastructure (sidewalks, crosswalks, etc.) along East Colvin Street at and near BL 81, which are in deteriorated conditions and will see increased pedestrian activity once the Project is complete.
- R 4-112: As depicted on sheet GP-CG-H5-33 in the plans in **Appendix A-1**, a new crosswalk would be installed on the south side of East Colvin Street crossing the new northbound BL 81 exit ramp. Additionally, a signal would be installed at the East Colvin Street intersection with the new ramp, with corresponding pedestrian signals for each crossing. The design of the Community Grid Alternative would be modified during final design to include crosswalks on each leg of the intersection and a full pedestrian signal system; in addition, the existing sidewalks, which are in poor condition, would be replaced within the limits of the Project. The City of Syracuse has a separate project to improve the Colvin Street corridor, which will look at pedestrian accommodations outside the limits of the I-81 Viaduct Project.

- C 4-113: In one several-hundred-foot section of Almond Street adjacent to the Pioneer Homes, NYSDOT has proposed a raised planter in the median presumably to discourage pedestrian crossing and encourage them to use widely spaced signalized intersections. Not providing a logical and convenient pedestrian crossing reduces the existing connection between the two sections of Pioneer Homes on either side of Almond Street and could potentially result in people trying to cross over the planted median.
- R 4-113: Traffic signals, along with crosswalks, would be added or modified along Almond Street and cross streets (from Burt Street to Erie Boulevard) except for Almond Street at Monroe and Madison Streets. While pedestrians would not be able to cross east-west at these streets under the alternative's current design because of the presence of a median there, pedestrian-activated signals at these streets will be considered during final design. Additional information on the Community Grid Alternative is provided in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS.
- C 4-114: As part of the Community Grid Alternative, extend the sidewalk farther east on Erie Boulevard beyond Teall Avenue. There is no sidewalk now.
- R 4-114: The proposed area is outside the Project limits of the I-81 Viaduct Project, but the extension of this sidewalk could be considered in the future as a separate undertaking.
- C 4-115: Please include curb bump-outs, bicycle lanes, and other safe bicycle and pedestrian amenities in the proposed redesign of West Street.
- R 4-115: As depicted in sheets GP-CG-S80-03 and 04 in the plans in **Appendix A-1**, West Street would include curb bump-outs and on-street parking south of the West Street/Genesee Street intersection. Sidewalks would be provided on both sides of West Street and West Genesee Street, and new sidewalk ramps, new crosswalks, and new pedestrian signals would also be provided along West Street and West Genesee Street. In addition, new shared use paths would be provided, substantially enhancing connectivity between multiple destinations including Erie Boulevard, West Genesee Street, West Street, the Onondaga Creekwalk, Empire State Trail, and Evans Street and the Franklin Square neighborhood. All these facilities would be designed using the latest criteria and safety measures in the NYSDOT Highway Design Manual, Chapter 17 ("Bicycle Facility Design") and Chapter 18 ("Pedestrian Facility Design"), as well as pertinent AASHTO guides.
- C 4-116: The Community Grid Alternative will improve the northern section of West Street. It should incorporate and examine improvements along the full length of West Street to reduce its width and provide better access and amenities for bicyclists and pedestrians.
- R 4-116: The proposal is outside the scope of the I-81 Viaduct Project. However, a future study could explore improvements along the full extent of West Street.

- C 4-117: As part of the Community Grid Alternative, include the full extent of West Street, which is oversized in both capacity and scale. The roadway could be made at grade for its full length, reduced to a neighborhood scale, and beautified with plantings. Return control of West Street to the City and make any excess land available for local redevelopment.
- R 4-117: Removal of the grade separation at the West Street/West Genesee Street interchange has been incorporated into the design of the Community Grid Alternative, including bringing West Street to surface level, reducing the width of West Street, and restoring it to be a city street. However, reconfiguration of West Street south of Erie Boulevard is not necessary to meet the Project's purpose and objectives or address the identified transportation needs. Implementation of the Community Grid Alternative would not preclude others from reconfiguring West Street south of Erie Boulevard as part of a future, independent action. West Street is owned by NYSDOT and at this time there are no plans to transfer ownership to the City of Syracuse.
- C 4-118: The plans show a big improvement from the existing Butternut Street bridge crossing experience for pedestrians, which now has narrow sidewalks and no facilities for bicyclists. To slow vehicular speeds on the Butternut Street bridge and improve pedestrian safety, please combine the proposed pedestrian walkway (6 feet wide), the bicycle lane (4 feet wide), and the buffer (4 feet wide) to create a shared 14-foot walking/bicycling corridor all above the street curb on both sides of the bridge. The driving lanes should be lined to be 11 feet with one foot "shoulders." It would also be helpful to buffer the traffic noise from the fast-moving cars below since it is extremely loud and an overwhelming sensory experience. Consider the opportunity to integrate noise buffering panels into the protective fence structure that could also contain culture related artwork. Another option to reduce traffic noise from the highway would be to keep traffic speeds lower until north of the Bear Street Bridge.
- R 4-118: Either the proposed design shown on the plans or the suggested shared use path would work, if it is compatible with facilities on either side of the bridge. NYSDOT will coordinate with the city, which owns the highway sections on either side of the Butternut Street bridge, during final design to refine the design in keeping with the Syracuse Bicycle Plan.
- C 4-119: Please do not impact Mission Landing (429 N. Franklin Street) by taking any of its property or altering Evans Street. Currently, Evans Street is a necessary buffer between the condominiums and I-690.
- R 4-119: While Evans Street would be reconstructed and realigned from just west of Onondaga Creek to its intersection with North Franklin Street, the character of the street and its low volumes would be preserved. A new sidewalk would be constructed along the north side of Evans Street, and a new shared use (bicycle/pedestrian) path would be constructed that would connect the new sidewalk on Evans Street to the new shared use (bicycle/pedestrian) path on the west side of Onondaga Creek. In addition, shared lanes (for vehicles and bicycles) would be provided on Evans Street between Franklin Street and Plum Street, which would provide bicycle access from the Franklin Square area to the new shared use

(bicycle/pedestrian) path on the west side of Onondaga Creek. The buffer between the location of the West Street on-ramp and I-690 would be maintained, and any trees that would be cut would be replanted along the shifted roadway alignment.

- C 4-120: With respect to Creekwalk improvements, at the north end of the proposed pathway, rather than a series of switchbacks up to Evans Street, the route should instead bridge the creek and lower Creekwalk to connect to the greenspace and “circle” just to the north. Evans Street provides vehicular access to a nearby garage but is otherwise not a route on which cyclists or pedestrians would travel. Connecting the new Creekwalk extension to the existing trail would ensure that it is activated; if the north terminus remains as designed, it may be too far removed and end up a scarcely utilized amenity.
- R 4-120: See response to **Comment 4-107**.
- C 4-121: The DEIS drawings show a new concrete shared path starting south of rebuilt I-690 running from West Genesee Street across a lawn area and then adjacent to Onondaga Creek on the west side under seven reconstructed I-690 bridges and then climbing up a very steep embankment to Evans Street. The climb up the steep embankment, which starts almost at the creek edge will be a torturous switchback, which by ANSI handicapped standards required by the NYS construction code can’t exceed 1 in 12 slopes with handrails on both sides and no longer than 30 feet long with between landings. It will probably have 6 switchback sections back and forth totaling 150 feet in length assuming the rise is 12 feet. The path ends at Evans Street, which does not have sidewalks, with sharrows continuing eastward. A suggested substitute would be to terminate the shared path before it goes under the seven bridges and have an area of park benches, an open area for children to play and a couple of concrete or metal tables for eating or games. Make it a mini destination, not a “path to nowhere.”
- R 4-121: The proposed path on the west side was created because of the removal of transportation infrastructure at West Street and would complement the path on the east side of the creek and provide additional connectivity.
- C 4-122: Please clarify which trees near Mission Landing will need to be removed. The mature deciduous and evergreen trees south of Mission Landing are important to the area’s quality of life and screen views of I-690. They also provide air quality benefits. Mission Landing and other Franklin Square residents should be involved in the detailed design process to determine the final design and layout of the landscape elements, including replacing at least all the trees to be removed, for the area between Mission Landing and the new highway infrastructure.
- R 4-122: NYSDOT has considered ways to minimize the amount of tree cutting that would be required to relocate Evans Street and reconstruct the existing path connecting to the Creekwalk to be ADA compliant. However, some amount of tree cutting is inevitable, and the trees that are cut would be replaced. NYSDOT welcomes the opportunity to work with Franklin Square residents and others in the development of the landscape plan for this area during final design.

- C 4-123: Design for bicycle and pedestrian safety along the new East Glen Avenue connecting from Brighton Avenue across the interchange at BL 81 to Loretto is very important. The current road, which provides important bicycle pedestrian access between the Valley and the Comstock neighborhoods, is straightforward but the new design looks bigger and more complicated, with heavier traffic.
- R 4-123: The new East Glen Avenue bridge over BL 81 would carry a 10-foot-wide shared use (bicycle/pedestrian) path, and crossings with cross streets and slip ramps will be clearly marked. In addition, NYSDOT would provide a shared use (bicycle/pedestrian) path from Brighton Avenue to the Loretto campus.
- C 4-124: The redesign of Interchange 3 along I-481 (future I-81) must include pedestrian, cycling, family and people/pet-friendly protected infrastructure. Ensure dedicated and protected pedestrian and bike access across Route 92. The improvements to Route 5/92 should incorporate "Complete Streets" design and include bicycle lanes or sidewalks that can accommodate pedestrians and bicyclists. The lack of shoulder and storm grates along this route make biking dangerous.
- R 4-124: The improvements in this area proposed by the Project are limited to spot improvements at the interchange and the Lyndon Corners intersection. Route 5/92 corridor improvements, including improvements to bicycle and pedestrian amenities and the Route 5/92 corridor, would not be precluded by the Project.

4-8 URBAN DESIGN/AESTHETICS/GATEWAYS

- C 4-125: The Community Grid Alternative should include a comprehensive urban design vision that includes goals, principles, and conceptual design illustrations for the lands fronting on Almond Street as a major entrance to the city, a revived district and distinct place. It should focus human scale connection between districts that are currently separated by the existing transportation infrastructure, including the neighborhoods of the Southside, East Adams, Near Eastside, University Hill, and Downtown. The urban design vision is also needed for the Near Eastside neighborhood, through which there will be major vehicular access via Crouse Avenue and Irving Avenue between University Hill and I-690, providing high speed highway access to the western, northern, and eastern suburbs. NYSDOT should consider funding an outside urban design firm to work with the city and NYSDOT to create a plan that integrates land use and transportation into a cohesive vision.
- R 4-125: NYSDOT understands the importance of an urban design vision as described above and welcomes the opportunity to work with the City of Syracuse, which will determine that vision consistent with the Project's needs and objectives during the final design phases of the Project. NYSDOT will also coordinate with pertinent stakeholders. The integration of urban design details and gateways will be further explored during final design.

- C 4-126: The southern end of BL 81 could be a beautiful entrance to Syracuse as is planned for the Canal District on the north end of BL 81.
- R 4-126: Gateway treatments at the Van Buren intersection, and potentially as the freeway transitions to an urban street, will be refined in final design.
- C 4-127: The design of the planned “Canal Corridor” requires careful planning to ensure it is authentic to the history of the area where the Erie and Oswego canals joined.
- R 4-127: Comment noted. See response to **Comment 4-125**.
- C 4-128: NYSDOT should work with the Erie Canal Museum directly when developing further plans for the Canal District and perhaps invest in making sure our infrastructure needs are met (like parking) through this project. The Erie Canal Museum is a top tourist destination and a city icon and should be considered and worked with during the planning stages.
- R 4-128: NYSDOT will work with the Erie Canal Museum and other local stakeholders when developing the design for the Canal District in the final design phase of the Project.
- C 4-129: The Community Grid Alternative should be designed in accordance with the scale and historic character of Syracuse. The Community Grid should be extended south to I-481 and should seek to return, where possible, the alignment of streets that were removed for the construction of I-81. The Project should include designing the replacement roadway to allow the reintroduction of access through the Oakwood Cemetery main gate; funding to mitigate the damage indirectly caused by I-81 to Oakwood Cemetery's main gate, old office, chapel, and road system; funding to rehabilitate housing and city streets in the adjacent neighborhoods that have been impacted by I-81; development of a signage system that reinforces the identity of Syracuse neighborhoods through which the new road will pass; and development of signage, markers, or a public art program that celebrates the history of Syracuse and the neighborhoods and landmarks that were destroyed for I-81 and the larger urban renewal program.
- R 4-129: The design of the Community Grid Alternative will be refined in final design and incorporate historic and cultural references where appropriate. Lowering the southern segment of BL 81 (on embankment) to create at grade, signalized intersections would further increase travel times to and from destinations to the south and divert additional traffic to the new I-81 (existing I-481). See response to **Comment 4-47** with respect to Oakwood Cemetery. Funding for housing is not part of this Project.
- C 4-130: Consider putting watershed/basin gardens with native plants between the sidewalk and street.
- R 4-130: In addition to employing a variety of best management practices (BMPs) in accordance with the NYSDEC stormwater manual and NYSDOT guidelines, NYSDOT's landscaping plan,

which will be developed during final design, will consider opportunities to use bioswales (rain gardens) and drought-resistant or native plants where reasonable.

- C 4-131: The project must incorporate aesthetic improvements, including treatments that commemorate the history of Syracuse, landscaping, and modern design elements. The Project must include attractive landscaping and a funding mechanism to maintain plantings.
- R 4-131: Aesthetic and gateway treatments have been and will continue to be an important consideration as the Project's design progresses and are discussed in **Sections 5.5.4 and 5.6.4** of the DDR/DEIS and FDR/FEIS. NYSDOT is committed to context-sensitive solutions, and the Project designs, including the urban design, have considered the community's character. The Project team designed Almond Street and other affected City streets in accordance with, and to support, the City's land use and zoning (ReZone Syracuse) plans and initiatives. In some cases, the City's history and context inspired designs such as that of the Lodi Street overlook, the Canal District, and the Creekwalk extension, which are described in **Section 3.4.3** and are depicted in corresponding figures. In addition, NYSDOT continues to work its Urban Design Technical Advisory Panel (see **Chapter 9** of the DDR/DEIS and FDR/FEIS) on potential gateway designs and treatments to enhance the aesthetics of the highway, and coordination with the City of Syracuse will continue to take place through final design.
- C 4-132: Consider incorporating public art into the project's design.
- R 4-132: NYSDOT could consider artistic treatments during final design.
- C 4-133: The project must include the highest quality design consistent with an upscale urban setting, including appropriate parking, green space, and traffic noise reduction.
- R 4-133: Refer to responses to **Comments 4-129** through **4-132**.
- C 4-134: Street design in pedestrian neighborhoods should not be oversized, which encourages higher speeds and traffic volumes. Traffic speeds should be limited to 30 mph for all downtown and residential city neighborhoods and all travel lanes should not exceed 11 feet design width, with corresponding design standards. City street design must promote long term economic development and quality of place for the pedestrians in existing and future residential and downtown communities.
- R 4-134: Critical design elements, including design speeds and lane widths, must meet the minimum criteria established for roadways based on their functional classification. These criteria are specified in the NYSDOT Highway Design Manual, Chapter 2 (see Design Criteria Tables in **Appendix C-6** for more information about design characteristics). The design criteria for this Project have been established in consideration of NYSDOT's Context Sensitive Design concept, which strives for outcomes that meet transportation service and safety needs as well as environmental, scenic, aesthetic, cultural, natural resource, and community needs.

C 4-135: Consider incorporating a skate park into the Project's design.

R 4-135: A skate park is not contemplated in the Project's design. The Community Grid Alternative would result in surplus transportation right-of-way. Stakeholders will be engaged in determining the future use of this right-of-way, and they could consider the proposal for a skate park.

4-9 MISCELLANEOUS

C 4-136: NYSDOT should dedicate the funds that it will save for operation and maintenance of the Community Grid Alternative to support affordable housing initiatives in the City of Syracuse.

R 4-136: This proposal is outside the scope of the I-81 Viaduct Project.

C 4-137: The Community Grid Alternative is intended to benefit developers along I-81 and I-481. There must be disclosure of who owns these properties.

R 4-137: As documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, implementation of the Community Grid Alternative could result in 10 to 12.5 acres of potential surplus transportation right-of-way. Regarding the disposition of this right-of-way, NYSDOT would form a land use working group consisting of representatives from the city, the city's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel. Any new use or development would be subject to the City of Syracuse's zoning ordinance and its Land Use and Development Plan 2040 currently being updated by the ReZone Syracuse project. Through the ReZone Syracuse process, the City of Syracuse has and continues to solicit community input.

C 4-138: If NYSDOT is still seeking input on the alternative it should choose, then explain why there have already been accepted bids for the Community Grid Alternative.

R 4-138: NYSDOT has not yet accepted bids for the construction of the I-81 Viaduct Project.

C 4-139: If the conversion of the existing I-81 to BL 81 would jeopardize the 90 percent level of Federal funding, consider renumbering it as an auxiliary route (i.e., 381).

R 4-139: Under the current funding regulations, high speed freeway sections of BL 81 would be eligible for up to 90 percent federal funding.

C 4-140: The Community Grid Alternative must include sufficient interchanges to reduce congestion and ensure adequate traffic flows to University Hill.

R 4-140: The Community Grid Alternative includes a new northbound exit from BL 81 to Colvin Street, which would improve access to University Hill from the south. It also includes new

interchanges on I-690 at Crouse and Irving Avenues to improve access to University Hill from locations east and west of it. A direct connection from the northern segment of BL 81 to I-690, leading to the new interchange at Crouse and Irving Avenues, would be provided. BL 81 Almond Street and other local streets would be designed to meet anticipated traffic volumes projected through the 2056 design year for the I-81 Viaduct Project.

- C 4-141: Introduce design concepts into the Project to enhance renewable energy development in the community including solar powered lighting/smart grid along the corridor route.
- R 4-141: Materials specifications and contractors are determined as design advances. NYSDOT would incorporate the latest technologies (such as renewable energy techniques) and safety features in the Project, as appropriate, if they meet NYSDOT's materials specifications and standards.
- C 4-142: In association with the Project, all I-81 interchanges should be re-numbered based on mileage.
- R 4-142: All interchanges on new I-81 and BL 81 within the Project Area would be renumbered with mileage-based exit numbers. Any new signs placed as part of the Project will list the new mileage-based exit numbers along with an "old exit number" panel. Replacing signs beyond the project limits would be done as part of separate projects.
- C 4-143: Please provide plans for the proposed new sewer trunk lines that will be built as part of the Project.
- R 4-143: Refer to **Chapter 5** and **Section 6-4-7** for a description of the proposed work. Refer to **Appendix A-1** for project plans.
- C 4-144: Construct new water infrastructure from Onondaga Lake to University Hill and Southside to help improve heating and cooling systems.
- R 4-144: This proposal is outside the scope of the I-81 Viaduct Project.
- C 4-145: Including charging stations for electric cars.
- R 4-145: Space does exist within the Project limits to include charging stations for electric cars. At the current stage of development for the Project, no providers or locations for charging stations have been identified. Inclusion of charging stations will be further evaluated in final design.
- C 4-146: NYSDOT should remove the New York, Susquehanna, and Western Railway overpass.
- R 4-146: Removal of the New York, Susquehanna, and Western Railway overpass, which carries an active rail route, is under the jurisdiction of the railway. NYSDOT has been coordinating with the railway to reconstruct the overpass as part of the I-81 Viaduct Project.

C 4-147: As part of the Community Grid Alternative:

- Retain the number of lanes currently in use. This removes any argument about access to hospitals.
- Do not place a new exit on I-690 for hospital access; cross over traffic is unsafe and congestion will result.
- Since the railway already separates the south side from downtown, consider extending West Street along the railway until it intersects with I-81. Straddling the tracks appears to be the simplest way to handle flow near the new traffic circle. This improves traffic access to the city from the west, allows access from the south to I-690 west, and reduces congestion along new-Almond.
- Build new pedestrian bridges for heavily congested intersections. Make them artful and inviting. Wide and more park-like. This could be accomplished by retaining a few of the elevated sections of I-81. With proper foresight, a design might even allow a London-bridge concept allowing for some business up there. Consider overhead parking to replace the lost under-81 parking.
- Make the County section of Route 90 free so that east-west flow through traffic would not be bottle-necked through I-690.

R 4-147: The number of lanes on the various sections of the Community Grid vary and have been determined based on travel demand. Access to hospitals is maintained. The new I-690 interchange at Crouse and Irving Avenues provides a direct route from the interstate to University Hill, one of the two major destinations for traffic, and helps alleviate traffic at Almond Street and other local streets. The Community Grid Alternative has been designed to meet traffic demand and reduce existing congestion. Extension of West Street along the railway for these purposes is not needed. This concept was considered during scoping (see response to **Comment 5-19**). Pedestrians generally prefer at grade crossings, as they provide a quicker and more direct route. At grade crossings are also highly visible, whereas separated crossings can be perceived to have security concerns because they are removed from the roadway. For these reasons, even when overpasses are provided, many pedestrians continue to cross at grade and need to be accommodated safely. Modifications to the toll structure of I-90 are outside the jurisdiction of NYSDOT, as I-90 is owned and operated by the New York State Thruway Authority.

C 4-148: It might make sense to extend Route 281 via Route 11 and I-81 after Interchange 16 to the new road where it will continue into the city with that designation rather than a business loop of I-81.

R 4-148: This concept is beyond the Project Area.

C 4-149: While improvements are implemented along I-481 at an early stage of construction, NYSDOT should use that time to discuss and review with the City of Syracuse the many details not yet

shown in any detail, such as landscaping, lighting, signage, sound barrier design, bridge aesthetic design, signaling and traffic control.

R 4-149: Coordination with the city will continue throughout final design.

C 4-150: NYSDOT is not conforming to the City's 20-foot curb cut requirement, which will upset those who were required to conform.

R 4-150: NYSDOT will coordinate driveway widths for city streets with the City of Syracuse. Widths will also be in accordance with the "NYSDOT Policy and Standards for the Design of Entrances to State Highways."

C 4-151: The property at 436 MLK, Jr. East has been identified for potential acquisition in the Project's preliminary design. Please consider the placement of a plaque or tablet to honor Frank "Pop" Harlow, to recognize him as one of the first Blacks, a pioneer, in sports and public service in the City of Syracuse.

R 4-151: The eligibility for a plaque along BL 81 would be assessed in final design.

5 OTHER POTENTIAL ALTERNATIVES

5-1 MODIFIED VIADUCT ALTERNATIVE RECOMMENDATIONS

- C 5-1: Consider a “stacked” viaduct alternative with one direction above the other direction or consider an alternative with one direction above ground and the other direction below ground. This would reduce the Project footprint and maintain existing exits. If the viaducts were enclosed, the highway would not be harmed by inclement weather.
- R 5-1: A stacked viaduct alternative (previously identified as Alternative V-5: New Stacked Viaduct) was considered and presented in the Project’s Scoping Report (April 2015). As documented in that report and in **Sections 3.2.2 and 3.3** and **Appendix B-1** of the DDR/DEIS and FDR/FEIS, the stacked viaduct alternative would not be reasonable and was dismissed from further consideration.
- C 5-2: Reduce the viaduct to function simply as a connector with one lane in each direction, having adequate shoulders and a speed limit of 35 mph, to reduce its footprint and reduce property acquisitions. A brief reduction to 35 mph on a viaduct connector route without stop-and-go on congested city streets would be an acceptable I-81 Business Route with redesignated I-481 to I-81 an available alternative. The modifications that are common to both alternatives and have obvious stand-alone merit should be implemented.
- R 5-2: Having an elevated highway that only provides for traffic bypassing the Downtown area (with no entrances or exits to Downtown or to I-690) would result in improved travel times for only a small percentage of the overall traffic (generally traffic that travels between areas south of the City to areas just north of the City (such as the Salina area). Additionally, because the Community Grid Alternative must meet the Project’s safety and operational needs (described in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS), a non-interstate, elevated route would result in substantial additional cost to upgrade the existing structure with limited benefit.
- C 5-3: Move the viaduct to Townsend Street.
- R 5-3: Construction of a viaduct along Townsend Street would require substantial property acquisition to accommodate the necessary transportation footprint.
- C 5-4: Consider replacing the I-81 viaduct with an expressway that would have a couple of well-placed smaller bridges on the expressway and/or cross-streets, and longer stretches of road with minimal traffic lights. This would add some cost, but not the significant cost of the other bridge proposals and would be an excellent compromise solution for all stakeholders.
- R 5-4: This concept would not be consistent with the Project’s need, purpose, and objectives, as discussed in **Chapter 1, Introduction** of the DDR/DEIS and FDR/FEIS. The concept would necessitate construction of bridges over streets crossing the proposed alignment or would

sever these streets, substantially diminishing local connectivity. Furthermore, the concept would adversely impact accessibility to Pioneer Homes, Forman Park, Crowne Plaza Hotel, and other destinations in this area.

C 5-5: Replace the viaduct with a viaduct that has fewer lanes.

R 5-5: This concept would not meet the Project's purpose, needs, or objectives as it would remove the capacity needed to accommodate the existing and future travel demand.

5-2 MODIFIED COMMUNITY GRID ALTERNATIVE RECOMMENDATIONS

C 5-6: The Community Grid Alternative should include removal of I-81 between the southern and northern interchanges with I-481 to fully reverse the harm of the highway through Southside and Northside neighborhoods.

R 5-6: As described in **Chapter 1, Introduction** of the DDR/DEIS and FDR/FEIS, the purpose of the I-81 Viaduct Project is to address transportation and structural needs in the Project Area. The complete removal of I-81 between the southern and northern interchanges with I-481 would not meet the purpose and need for the Project.

C 5-7: Remove I-81 and its existing exits for the full length between its existing interchanges with I-481 and route I-81 along I-481. Do not construct the Community Grid Alternative and transfer the existing elevated I-81 traffic to ground level through the city. Let the community and government leaders figure out how to best use the recaptured space in a way that makes sense for the community in the long run and not rush to judgment on how best to use that space.

R 5-7: With the Community Grid Alternative, the existing I-81 would be routed along I-481. However, improvements to the local street network are necessary to accommodate traffic destined to Downtown Syracuse, as detailed in **Chapter 5, Transportation and Engineering Considerations** of the DDR/DEIS and FDR/FEIS. Making no local street improvements would result in unacceptable levels of traffic congestion and travel delays. Further, removing I-81 between its two existing interchanges with I-481 would not meet the purpose and need of the Project.

NYSDOT would form a land use working group consisting of representatives from the city, the City's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel. Further details about the formation of and participation in this working group would be presented during continued Project public involvement activities. Final design must begin before the formation of this group, however, NYSDOT would form the group prior to the start of the construction phases.

C 5-8: “The Full Street-Grid Solution” that was submitted after publication of the 2019 preliminary DEIS should be reconsidered. The current Community Grid Alternative is a weak proposal that maintains a highway through much of the City and will encourage through traffic to use BL 81 rather than the re-routed I-81. A true full street-grid solution would provide much more opportunity to improve the street network, radically improve public transit, stimulate development, increase the tax base, and generally to refashion the city for future growth and prosperity. For a true street-grid solution, the key requirement is to convert all of I-81 freeway within Syracuse into city streets, not just the viaduct. On the southside, remove the berm (to facilitate future development) and connect earlier to several major streets. On the northside, convert to a city street with new development on both sides, and upgrade several parallel streets and intersection to share the traffic. With this approach, street connections fall naturally into place, the ‘Canal district’ can work, a new ‘Canal Park’ is created, and an enormous amount of development opportunity arises.

R 5-8: The “Full Street-Grid Solution” was considered in Appendix M-5 of the DDR/DEIS. Refer to responses to Comments 3-116a through 3-116gg in that appendix.

5-3 SKYWAY / HYBRID OPTIONS

C 5-9: NYSDOT should consider a hybrid alternative that incorporates the Community Grid in conjunction with a rebuilt viaduct, tunnel, or new bridge.

R 5-9: Numerous hybrid alternatives were considered and found to be unreasonable. See **Sections 3.2 and 3.3** of the DDR/DEIS and FDR/FEIS for further discussion about alternatives considered and dismissed. Also, refer to the responses to **Comments 3-2, 5-10, and 5-17**

C 5-10: Several commenters stated that the Project should include a “signature,” “iconic,” or “skyway” bridge structure either as a separate alternative or in addition to the Community Grid Alternative. Some commenters suggested that the signature bridge would span the Almond Street corridor and provide a high-speed route through the city. Some suggested a central park below the iconic bridge. Some commenters suggested the skyway bridge be named after Harriet Tubman.

R 5-10: In response to these comments, FHWA and NYSDOT considered whether the construction of one of the various long-span bridge types typically associated with signature bridge structures could potentially be a reasonable concept for the Project warranting further evaluation. It is noted that these types of bridges typically are constructed to address challenging topography, such as waterways serving substantial marine traffic requiring large navigational channels or where the roadway crosses deep valleys. They are rarely, if ever, constructed solely to provide a signature structure when more economical and less impactful options are available; however, in consideration of the comments received, the agencies conducted a conceptual evaluation of a potential signature bridge.

Alignment and Major Highway Features of Signature Bridge Concept

General Limits and Configuration

It is assumed that a signature structure would be designed to carry a freeway and generally follow the Almond Street corridor along the existing I-81 alignment. This structure would be built in conjunction with street-level improvements of the Community Grid Alternative. The potential signature bridge would connect southern I-81/Business Loop (BL) 81 and I-690 to provide high-speed travel for through traffic, while the Community Grid Alternative would provide local connections for vehicles below the bridge and accommodate bicyclists and pedestrians.

FHWA and NYSDOT considered a signature bridge that would begin approximately just south of Burt Street and end just south of Genesee Street, for a total bridge length of between 3,000 and 3,500 feet. Several bridge types could accommodate this overall bridge length. The north end of the bridge would need to end in the vicinity of Cedar Street to allow enough space for ramp connections between the bridge terminus and I-690. The south end of the bridge would be located approximately where the existing viaduct begins, to facilitate inclusion of an interchange at MLK, Jr. East. This interchange would be required for local street access since an interchange could not be provided from the bridge's main span. Similarly, placing the northern limit in the vicinity of Genesee Street would provide enough separation from I-690 to allow for an interchange with I-690. It is assumed that the bridge would contain a total of either four (two in each direction) or six (three in each direction) lanes plus shoulders.

In addition to the main span of the signature bridge, both the south and north approaches would consist of multi-span bridges to accommodate the numerous necessary ramp and city street crossings. On the south approach, there would be bridges over MLK, Jr. East and the New York, Western, and Susquehanna (NYW&S) Railway bridge. The entire north approach also would need to consist of multi-span bridges.

The signature bridge and approach highways would be designed to meet freeway standards, and both interstate and non-interstate options were considered. Interchange types and configurations would likely vary if the highway carried by the signature bridge was an interstate or non-interstate freeway. As discussed earlier, an interchange would be necessary at MLK, Jr. East. Entrance and exit points between Burt and Cedar Streets to the city street grid would not be feasible from the signature bridge but would be provided by the elements incorporated from the Community Grid Alternative. To replace the functionality of the existing Harrison Street/Adams Street interchange, the existing I-81/I-690 interchange would be reconstructed and reconfigured. The new I-690 interchange at Crouse and Irving Avenues, provided under the Community Grid Alternative, would be included in the signature bridge concept.

Interstate Option

This option would reconstruct I-81 generally along its current elevated alignment through the city. Since this option would maintain I-81 through the city, the conversion of I-481 to I-81 would not be necessary. Any interchanges would need to be full interchanges (an interchange that provides all directions of travel). This option includes many features of the Viaduct

Alternative as presented in the DDR/DEIS and FDR/FEIS, except for the following notable differences, which are further described below:

- The interchange at Harrison and Adams Streets would be eliminated,
- A full interchange would be needed on I-81 at MLK, Jr. East, and
- A full interchange would be needed on I-690 at Crouse and Irving Avenues.

Non-interstate Option

This option would replace existing I-81 through the city with an elevated, non-interstate freeway (i.e., Business Loop 81) that generally would follow the current I-81 alignment. Since this option would remove a section of I-81, the conversion of I-481 to I-81 would be necessary. Partial interchanges would be feasible. This option would require:

- A partial interchange on BL 81 at MLK, Jr. East,
- A partial interchange between BL 81 and I-690, and
- A full interchange on I-690 at Crouse and Irving Avenues.

Connections to I-690 and Local Streets

Interstate Option

Between Colvin and Burt Streets, existing I-81 would be reconstructed close to its current location, although the elevation of the freeway would rise as it approaches the signature bridge. It is assumed that the existing bridge over MLK, Jr. East would be replaced and, due to the higher elevation, the section of freeway from just south of the railroad crossing to the start of the signature bridge would be a multi-span bridge structure. Due to the characteristics of a long span signature bridge, it is not possible to provide ramp connections within the limits of the main span, and as a result, an interchange at Adams and Harrison Streets could not be included. Therefore, a full interchange would be required at MLK, Jr. East to provide exits and entrances in both directions for access to local streets. In addition, since the existing interchange at Adams and Harrison Streets would be eliminated, an interchange with I-690 would be required, a new I-690 interchange at Crouse and Irving Avenues would be required, and the I-690 interchange at West Street would be reconfigured. Additionally, a southbound I-81 exit to Clinton Street and a northbound entrance from Pearl Street would be provided, but a new southbound exit to Oswego Boulevard and a northbound Pearl Street extension to Erie Boulevard would not be feasible. To provide connectivity to a full interchange at MLK, Jr. East, a street-level, four-lane "southern boulevard" would be needed between the MLK, Jr. East full interchange and Almond Street at Van Buren Street. It is assumed that the southern boulevard would be similar in configuration to the Community Grid Alternative as presented in the DDR/DEIS and FDR/FEIS and would require replacement of the existing NYW&S railroad bridge. Due to the proximity of the Dr. King Elementary School and the residential area to the west, and of the railroad to the east, the new MLK, Jr. East interchange would be a tight urban diamond interchange where the northbound on-ramp would branch off from the southern boulevard between MLK, Jr. East and the railroad bridge.

As described above, the signature bridge would likely start in the vicinity of Burt Street and end in the vicinity of Cedar Street. Since the signature bridge's alignment would be straight, several buildings along Almond Street would need to be acquired, such as the Syracuse Housing Authority administration building and the Syracuse University steam plant. In addition, numerous, primarily residential buildings would be impacted on the north side of I-690 east of Crouse Avenue due to the new westbound off-ramp, as well as within the I-81/I-690 interchange area. In total, it is estimated that 35 to 40 buildings would need to be removed, including residential, office, institutional, and commercial uses, as well as utility properties. The signature bridge concept would adversely affect multiple historic structures in the adjacent areas, such as Veteran's Fastener Supply Company, the Learbury Centre (which contributes to the North Salina Street Historic District), the former NY Central Railroad Passenger and Freight Station buildings, VIP Structures, Smith Restaurant Supply, Reid Hall, Peck Hall, the Crichton Apartments, Wag Foods, the Howard & Jennings Pump Factory, and the Syracuse Herald building. At the north end of the signature bridge, the horizontal alignment of I-81 would begin to curve at its confluence with I-690 through the interchange area. Additionally, the various ramps would diverge from the mainline. However, the northbound I-81 to eastbound I-690 and the westbound I-690 to southbound I-81 connector ramps would need to merge and diverge within the median of I-690 to meet ramp spacing criteria. All other directional ramp connections would be similar to those included in the Viaduct Alternative.

As a result of eliminating the existing I-81 interchange at Harrison and Adams Streets, a new I-690 interchange at Crouse and Irving Avenues would be required. The Crouse and Irving Avenues interchange configuration would be similar to that in the Community Grid Alternative design, except that the overall footprint of I-690 would be wider between McBride Street and Irving Avenue to accommodate the I-81 connector ramps in the median area and the Crouse and Irving Avenues ramps on the outside. This configuration would likely impact both the former New York Central Railroad Freight Station building on the north side of I-690 and the former Passenger Station building on the south side of I-690, both of which are listed on the National Register of Historic Places (NRHP).

Non-interstate Option

For the non-interstate option, between Colvin and Burt Streets, existing I-81 would be reconstructed close to its current location as a non-interstate freeway. Similar to the interstate option, the elevation of the freeway would rise as it approaches the start of the signature bridge, the bridge over MLK, Jr. East would be replaced, and, due to the higher elevation, the section of freeway from just south of the NYW&S railroad crossing to the start of the signature bridge would be a multi-span bridge structure. Due to the characteristics of a long span signature bridge, it is not possible to provide ramp connections within the limits of the main span, and as a result, an interchange at Adams and Harrison Streets could not be included. Therefore, a partial interchange would be required at MLK, Jr. East to accommodate traffic to and from the south. Due to the proximity of the residential area to the west and the railroad to the east, the new MLK, Jr. East interchange would be a half diamond interchange. Additionally, a partial interchange with I-690 would be required, a new I-690 interchange at Crouse and Irving Avenues would be required, and the I-690 interchange at West Street would

be reconfigured. A southbound BL 81 exit to Clinton Street and a northbound entrance from Pearl Street would also be provided, but the new southbound exit to Oswego Boulevard and the northbound Pearl Street extension to Erie Boulevard, which are included in the Community Grid Alternative, would not be feasible under the signature bridge concept. A street-level, four-lane “southern boulevard” would be needed between the MLK, Jr. East interchange and Almond Street at Van Buren Street. It is assumed that the southern boulevard would be similar in configuration to the Community Grid Alternative in the DDR/DEIS and would require replacement of the existing railroad bridge.

As described above, the signature bridge would likely start in the vicinity of Burt Street and end in the vicinity of Cedar Street. Since the signature bridge’s alignment would be straight, several buildings along the Almond Street corridor would be impacted, such as the Syracuse Housing Authority administration building and the Syracuse University steam plant. In addition, the signature bridge concept would require the acquisition of numerous buildings on the north side of I-690, east of Crouse Avenue (due to the new westbound off-ramp), and within the BL 81/I-690 interchange area. An estimated 35 to 40 buildings would need to be removed, including residential, office, institutional, and commercial uses, as well as utility properties. Furthermore, multiple historic structures in the adjacent areas would be adversely affected. At the north end of the signature bridge, the horizontal alignment of I-81 would begin to curve at its confluence with I-690 through the interchange area. Similar to the interstate option, the various ramps would diverge from the mainline; however, the eastbound I-690 to northbound BL 81 ramp and the southbound BL 81 to westbound I-690 ramp would not be provided. Due to the overall interchange configuration, the building impacts at the interchange would be similar to the impacts under the Viaduct Alternative. Similar to the interstate option, the northbound I-81 to eastbound I-690 and the westbound I-690 to southbound I-81 ramps would need to merge and diverge within the median of I-690 to meet ramp spacing criteria.

As a result of eliminating the existing I-81 interchange at Harrison and Adams Streets, a new interchange on I-690 at Crouse and Irving Avenues would be required. The Crouse and Irving Avenues interchange configuration would be similar to the Community Grid Alternative design, except that the overall footprint of I-690 would be wider between McBride Street and Irving Avenue to accommodate the I-81 connector ramps in the median area and the Crouse and Irving Avenues ramps on the outside. This configuration would likely impact both the New York Central Railroad Freight Station, which is listed on the NRHP, on the north side of I-690 and the Spectrum building on the south side of I-690.

Design Criteria

Under both options, the highway, including the portion carried by the signature bridge, would be subject to freeway design criteria and a 60-mph design speed. Refer to the Design Criteria tables included in the DDR/DEIS and FDR/FEIS (see **Appendix C-6**).

1. Signature Bridge Types and Implications

Several structure types are commonly used for providing long-span signature structures. These include cable stayed, suspension, and arch bridges, as discussed below.

Cable Stayed Bridges

Typically, cable stayed bridges are most economical for span lengths ranging from about 700 to over 3,500 feet. This bridge type's name is derived from a design where the superstructure is directly supported by stay cables from towers. Cable stayed bridges typically have three spans—a center (or main) span, which is the longest, and two side (or back) spans flanking the main span. The roadway deck slab is supported on framing with transverse floor beams supporting the deck slab, and edge girders, which run longitudinally along both edges of the bridge superstructure and support the floor beams. The edge girders, in turn, are supported by the stay cables, which transfer the loads carried by the superstructure to the towers, which then carry the loads into the ground. Deep foundations are required to transfer these loads into bedrock. The ends of the cable stayed superstructure are supported by anchor piers, which also support the ends of the approach spans.

The height of the roadway above grade over the length of the cable stayed unit would need to be a minimum of about 50 feet. Approach spans would be needed to transition the roadway from this height to that of the roadway at either end of the bridge. The approach spans typically are constructed of steel or precast concrete girders, with conventional concrete piers, similar to the construction of the existing I-81 viaduct.

Although both concrete and steel have been used for the superstructures of cable stayed bridges, steel is typically more economical. The floor beams and edge girders are typically fabricated as I-sections. To expedite construction, precast concrete panels are typically used for the deck slab, post-tensioned using high-strength steel bars where required to prevent excessive cracking. Multiple wire strands are typically used for the stay cables. The towers are typically constructed as concrete box sections to facilitate installation, as well as the inspection and maintenance of the stay cables and their anchorages. For the foundations, either piles or drilled caissons are typically used.

Given their cost, cable stayed bridges, like other types of long span bridges, are typically constructed where they are most economical; that is, where their length is required to span over obstacles that make substructure construction prohibitively expensive or infeasible. Typically, cable stayed bridges span waterways where there are required horizontal and vertical clearances for marine traffic. Cable stayed, and long span bridges in general, are rarely constructed as viaducts, except where the roadway crosses deep valleys that make pier construction very expensive, such as at the Millau Viaduct in France, where the roadway is more than 1,000 feet above grade, making it the tallest viaduct in the world.

Cable stayed bridge construction begins with the foundations and the towers, after which the main span is typically constructed cantilevering away from the towers in lengths corresponding to the cable stay spacing. The precast deck panels are installed as the superstructure construction progresses. The approach structures are typically constructed concurrently with the cable stayed unit.

For foundation construction, crawler cranes would be required for pile installation or drilled shaft construction. Foundation construction typically proceeds at several locations

simultaneously. Staging areas are required for storing the piles from when they are brought to the site until installation. For drilled shafts, staging is required for storing reinforcement and tying the reinforcement cages that are used to reinforce the shafts. As described below, substantial temporary and permanent impacts could be expected from this construction and the resulting substructure footprint.

With the foundations constructed, pile caps would then be formed and poured to allow loads from the piers/towers to be distributed among the piles/shafts. In the case of a conceptual four-lane, 3,000-foot-long cable stayed bridge in Syracuse, each tower foundation would be approximately 140 feet by 80 feet with 15 nine-foot-diameter drilled shafts.

Cable stayed bridge towers are typically constructed using jump forms, which encircle the column to provide a work platform and can be self-climbing to eliminate the need for cranes to advance the forms up the towers. Cranes are needed to lift the reinforcement cages for installation prior to placing concrete, which is typically pumped from the ground. Tower cranes are also commonly installed as tower construction progresses and are used for the upper portions of the towers.

The anchor piers at either end of the cable stayed unit along with the approach span piers are typically constructed simultaneously with the towers and are of conventional concrete construction. If drilled shafts are used for the foundations, they can be transitioned into the columns of the piers to simplify construction.

Once the towers are completed, construction of the superstructure begins by installing sections of edge girders and then the connecting floor beams followed by the supporting stays. These are typically brought to the site and lifted in large, preassembled sections from barges when spanning a significant waterway, but for construction over land in a dense urban environment, erection would be by the “stick-built” method, requiring thousands of delivery trucks using local streets. With the steel erected, the precast deck panels are then placed, and the crane advanced for the next section of superstructure.

Other Signature Bridge Types

Other long-span, signature bridge types include suspension or arch bridges. Suspension bridges were once the preferred long-span bridge type but have been supplanted for span lengths less than about 3,500 feet by cable stayed bridges, which are more economical and require less time to construct. The cables of suspension bridges require the construction of large concrete anchorages, which must be completed before the cables can be constructed. Cable construction then must be completed prior to the start of superstructure construction. In addition to being more expensive than cable stayed bridges, a suspension bridge would result in greater construction impacts because it would have four massive foundations (two at the anchorages and one at each of the tower piers) and a longer construction duration.

Tied arch bridges are more economical than suspension bridges for the expected main span length (approximately 1,700 feet) and are typically considered for span lengths ranging from about 500 to 800 feet. However, they are less economical than cable stayed bridges, particularly for spans exceeding 800 feet. The increased expense is due to the falsework

required to support the arch ribs during construction and the greater quantity of steel that is needed as compared to a cable stayed bridge. A 1,000-foot-span tied arch would be one of the longest in the western hemisphere.

I-81 Signature Bridge Concept

For discussion purposes, a cable stayed bridge concept was considered for the I-81 signature bridge, given its cost advantages and potential for aesthetic treatments. The bridge would carry the four lanes of I-81 (with the potential to require six lanes) with 5-foot inside shoulders and 12-foot outside shoulders, with a 2-foot median and 1.5-foot barriers, for a minimum total roadway width of 85 feet. Assuming a main span length of about 1,700 feet with 700-foot side spans results in a total length of 3,100 feet for the cable stayed unit. The height of the tower above the roadway would ideally be approximately 325 feet, which, when added to the 50-foot roadway height, yields a total tower height of 375 feet, about 37 stories. As discussed previously, cable stayed, as well as other long span bridge types, are used where there are either obstacles to be crossed or where the cost of substructure units is expensive enough to make them more economical than shorter span structures. For this project, the cost of a “signature” structure would far exceed alternative means to traverse the corridor. A minimum project cost increase of \$800 million could be expected. In addition, these structure types incur higher maintenance costs, as the cables and towers require inspections by specialists, as well as specialized access that results in more disruptive lane closures. Additional costs for security, both physical and electronic, also would be incurred.

In addition to increases in construction duration, the overall project timeline would be increased due to the time required for the bridge’s design. This would be the case whether design-build or design-bid-build was chosen as the project delivery method. A project duration increase of three to five years could be reasonably expected. As is the case for all cable-supported structures, the design would need to include a physical wind tunnel testing program to verify the structure’s aerodynamic stability, including both local climatological studies to determine the effects of the local terrain on wind behavior, as well as the testing of models representing the structure to verify its response to the wind, both during construction and in its final condition. Given the uniqueness of the Project (wind turbulence would be caused by the nearby building structures), it is possible that the bridge would respond differently to wind loads than similar structures over water, which would require making refinements to the design and potentially further increasing the Project’s duration.

The construction of the bridge would pose challenges given its location and proximity to the local community. There would be difficulties in finding the space needed for staging areas near the site to allow for material storage and pre-assembly of bridge components. Travel through the area would be disrupted substantially and additional/larger construction vehicles and equipment (e.g., cranes) would add traffic, noise, and air quality emissions to the communities for the duration of construction due to the large bridge members required for this type of structure. It would not be feasible for the signature bridge alignment to avoid densely developed areas of downtown Syracuse, which include residences, parks, schools, and businesses.

The construction of the Goethals and Mario M. Cuomo Bridges each lasted about three years and a similar or longer construction duration could be expected for a signature structure in Syracuse, given the difficulties discussed above in accessing the site. Additional property acquisition would be required on both sides of the highway to provide adequate room for clearance. The tower foundations could be over 140 feet wide and would likely require the demolition of buildings in their vicinity to provide adequate room for their construction. Additionally, these tower foundations would likely exist in the footprint of the existing corridor, requiring temporarily rerouting traffic for the full duration of construction.

In addition, specific safety concerns are associated with these types of structures. Cable stayed bridges are susceptible to issues resulting from the accumulation of snow and ice on the stays. In Vancouver, British Columbia, this has been an issue for both the Alex Fraser and the Port Mann Bridges, with snow and ice falling on vehicles and even smashing windshields. At the Port Mann Bridge, this issue is exacerbated by the stay geometry, which has the stays crossing over the roadway, resulting in the closing of the roadway just three days after opening to traffic. Methods have been developed to remove the snow from the stays before it can accumulate to the point where it poses a hazard, but they are labor intensive and would be of concern in Syracuse, which receives three to four times the annual snowfall of Vancouver. Given the height of the structure, the falling snow and ice could also pose risks to the surrounding buildings, traffic on side streets, and pedestrians, which are typically not concerns for river crossings. Due to the width and height of a signature bridge, there would be more snow requiring removal and the current method of plowing the snow over the edge of the bridge would need to be replaced with a slower, more expensive process of loading the snow into trucks for disposal to an offsite location.

2. Potential Impacts

Based on its substantial cost and constructability issues, and in consideration of the potential environmental and other impacts described below, the signature bridge concept is considered unreasonable and dismissed from further study.

Both interstate and non-interstate options of the potential signature bridge concept have many of the same benefits as the Community Grid Alternative but differ from the Community Grid in that they also would include construction of the signature bridge. This additional element would result in greater cost and adverse impacts, as described below.

Construction Costs, Constructability, and Maintenance

- The potential cost of this concept does not provide added value commensurate with the increased cost (at least \$800 million to \$1.2 billion more than the cost of the Community Grid Alternative with a cable stayed option, and likely more with other signature bridge types).
- Construction of the signature bridge concept would take at least 8 to 10 years (two more years than the Community Grid Alternative with a cable-stayed bridge and two to four more years with a suspension bridge), resulting in lengthier construction disruption.
- A signature bridge would incur higher maintenance costs than a modern viaduct or street-level roadway. The structure's cables and towers would require inspections by specialists,

as well as specialized access that would result in more disruptive lane closures. Additional costs for security, both physical and electronic, also would be incurred.

- As described above, cable stayed bridges are susceptible to issues resulting from the accumulation of snow and ice on the stays. Methods have been developed to remove the snow from the stays before it can accumulate to the point where it poses a hazard, but these methods are labor intensive, and Syracuse receives high annual snowfall amounts. Also as noted above, given the height of the structure, snow would need to be picked up and removed by truck from the bridge, as conventional snow plowing would pose risks to the surrounding buildings, traffic on side streets, and pedestrians, which are typically not concerns for water crossings.
- Construction of the signature bridge over land in a dense urban environment would be accomplished by the “stick-built” method, requiring thousands of delivery trucks using local streets. Additionally, during construction, the erection of the signature bridge would require extensive closures along the corridor, effectively closing the existing viaduct and Almond Street for a substantial duration. Through traffic would be rerouted to I-481, which would require improvements to accommodate the additional traffic and local access/connectivity also would be disrupted.

Property Acquisitions and Related Economic and Cultural Impacts

- To provide the required design standards and highway connections and accommodate the bridge piers and laydown areas, the signature bridge would result in the acquisition of 35 to 40 commercial, institutional, and residential buildings. Many of these buildings are very large, including the Syracuse Housing Authority office and Syracuse University buildings. Both options also would affect utility properties, including the Syracuse University steam plant.
- The signature bridge concept would adversely affect an estimated 12 historic structures in the adjacent areas, such as Veteran’s Fastener Supply Company, the Learbury Centre (which contributes to the North Salina Street Historic District), the former NY Central Railroad Passenger and Freight Station buildings, VIP Structures, Smith Restaurant Supply, Reid Hall, Peck Hall, the Crichton Apartments, Wag Foods, the Howard & Jennings Pump Factory, and the Syracuse Herald building.

Traffic and Connectivity Impacts and Consequent Air, Noise, and Environmental Justice Effects

- A signature structure spanning a long section of Syracuse over Almond Street would accommodate through traffic, but through traffic comprises only about 12 percent of traffic currently using the existing viaduct. Most of the traffic using the viaduct has destinations within the City. and as noted above, a signature bridge design would eliminate the potential to maintain the Harrison Street/Adams Street interchange, which is the primary point of access to and from the City street grid for many destinations within the City, including University Hill, the largest activity center in Central New York. As described above, without the ability to provide an interchange at Adams and Harrison Street, interchanges would need to be provided at MLK, Jr. East, Crouse and Irving Avenues, West Street, and at I-690.

- The additional interchange at MLK, Jr. East and a four-lane “southern boulevard” would attract more traffic to the area adjacent to the elementary school, as it would become the primary connection to the City street grid for trips to and from the south.
- The full or partial interchange at MLK, Jr. East in combination with the removal of direct access to Harrison and Adams Streets would increase traffic using the local street network to reach University Hill from the south. Consequently, it would increase traffic and related emissions and noise near Dr. King Elementary School and the adjacent residential neighborhood. It is likely that the air quality and noise effects of the signature bridge would be similar to the effects of the Viaduct Alternative. Bridge traffic would be at a higher elevation so some receivers on higher floors could experience greater effects, while those on lower floors could experience lesser effects.
- As documented in the DDR/DEIS and FDR/FEIS, the areas surrounding the existing I-81 viaduct between Van Buren Street and the I-690 interchange include low-income and/or minority (environmental justice) communities. A signature bridge spanning these areas would displace these residents. It would displace businesses with minority and/or low-income employees and that serve low-income and minority populations. It would increase transportation right-of-way through the neighborhoods and encroach on important community facilities, such as Dr. King Elementary School and Wilson Park. It would also increase traffic through minority and low-income communities to serve University Hill and consequently result in greater air and noise impacts. At the same time, the signature bridge would not provide direct benefits to the communities beneath it and would not provide traffic access to the adjacent neighborhoods. The structure would be a dominant visual feature and barrier throughout the area.

Other Environmental Impacts

- Existing I-81 has been recognized by local plans as a barrier between neighborhoods. The signature bridge concept would construct a new, wider, taller, and more substantial barrier between neighborhoods. While the Community Grid portion of the signature bridge concept would provide east-west access between neighborhoods for vehicles, bicycles, and pedestrians, the signature bridge would negatively affect community cohesion and its abutments would impact bicycle path continuity and connectivity. A signature bridge would not correct existing I-81’s detrimental effects on community cohesion and neighborhood character.
- Compared to the existing I-81 viaduct, the wider signature bridge structure would have more encroachment on Wilson Park and would be closer to Forman Park.
- The signature bridge’s greater width and height would substantially change the visual character of the area for multiple user groups. Its towers would be among the tallest structures in Syracuse and would be visible from many parts of the city. The bridge itself would also be taller than many adjacent structures and would be even more of a prominent feature of the skyline than the I-81 and I-690 viaducts are today. Many areas near the signature bridge, including Pioneer Homes and other adjacent properties, would experience increased shadowing throughout periods of the day and could be in full shadow during winter months.
- Since the signature bridge would be in an urban setting, and its design would include features to manage stormwater flows, it would not result in effects to natural resources that would differ from those predicted for the Viaduct and Community Grid Alternatives.

- C 5-11: NYSDOT has an obligation to issue a Supplemental EIS with a new alternative combining the Community Grid and a Harriet Tubman Memorial Freedom Bridge based on the established Project purpose and objectives, as well as corollary goals, including: to repair some of the damage from the original construction of Interstate 81 over 50 years ago; to promote jobs for the neighborhood residents; to reduce the effects of air pollution from traffic; to remove high-speed through traffic from the city; to create economic opportunity for Black-owned businesses; and to make land available for taxable development to support the city; to improve housing conditions.
- R 5-11: A Supplemental EIS to study the Skyway concept is not needed. The Skyway concept has been considered and dismissed. The Community Grid Alternative would meet the Project objectives. The "corollary goal" is not an established goal in comparing the different Project alternatives studied under the I-81 Viaduct Project.
- C 5-12: To further emphasize the need for a Supplemental EIS described in **Comment 5-11**, the comparison of the Viaduct Alternative with the Community Grid was biased. Many features that were included in the Viaduct Alternative were not in the Community Grid Alternative. These added features increase the cost of the Viaduct compared to the cost of the Community Grid Alternative. The Viaduct Alternative would be providing services and functionality not provided by the Community Grid Alternative, an unfair and biased analysis. Those additional features should be eliminated in comparing the Viaduct and Community Grid Alternatives. The impact could be significant. For instance, the cost of the Viaduct Alternative is estimated at \$2.2 billion compared to the cost of the Community Grid at \$1.9 billion. The difference in cost is cited by NYSDOT as a factor in its selection of the Community Grid as the preferred alternative. In a supplemental DEIS, NYSDOT should account for the differences in functionality by eliminating the cost of the added features from the Viaduct Alternative estimated cost. Such an exercise will result in a significant change in the comparable costs and impacts, especially with regard to the number of properties to be acquired and employees displaced.

The following features should be removed from the analysis of the Viaduct Alternative cost and impact estimates:

A. Reconstruction of I-690 and Existing I-81/I-690 Interchange and Provision of Missing I-81/I-690 Connections. The cost of the new ramps should be eliminated including the connections from:

- Southbound I-81 to westbound I-690
- Eastbound I-690 to northbound I-81
- Northbound I-81 to eastbound I-690 replacing the east side ramp with an exit on the west side of the roadway.

B. Costs associated with accommodating a 60-mph speed limit for design purposes, including wider lanes and shoulders and additional land acquisition.

C. Widening of I-81 from Interchange 20 to Interchange 24 to four lanes in both directions would not be necessary.

- R 5-12: Both of the Project's build alternatives, the Viaduct and Community Grid Alternatives, were compared to the No Build Alternative and not to one another. Both build alternatives include similarly common features when appropriate (such as the northern improvements). The Community Grid Alternative includes improvements to I-481 as part of its re-designation to I-81; these improvements would not be necessary under the Viaduct Alternative, which would maintain the interstate through the city.

The decision to identify the Community Grid Alternative as the Project's preferred alternative is not based solely on cost but on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the project alternatives; and national, state, and local environmental protection goals (refer to **Section 8.3** for more information and conclusions regarding the Community Grid Alternative). A) The Viaduct Alternative includes a full I-81/I-690 interchange. New ramps would be built to provide direct connections, which are unavailable today, between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690. These new direct connections to facilitate interstate-to-interstate movement would be consistent with AASHTO's "A Policy on Design Standards Interstate System" (May 2016), which states, "Interchanges shall be provided between all intersecting interstate routes, between other selected access-controlled highways, and at other selected public highways to facilitate the distribution of traffic. Each interchange shall provide for all traffic movements." B) Both build alternatives have been designed to current design standards; exemptions are included in **Appendix A-3**). Under the Viaduct Alternative, the widening of the portion of I-81 from I-690 to Hiawatha Boulevard from three to four lanes in each direction is needed to improve capacity and traffic operations; in addition, several non-standard highway features, such as narrow shoulders, tight curves, and reduced sight distance, would be corrected to improve safety.

- C 5-13: The Skyway proposal should not move forward.
- R 5-13: As described above, NYSDOT explored the Skyway concept and dismissed it from further consideration for the reasons cited in the response to **Comment 5-10**. Therefore, NYSDOT will not further explore the Skyway option.
- C 5-14: If NYSDOT moves forward with the Skyway proposal, it should toll drivers that are not from Onondaga County that would use the facility. There should be no tolls for Onondaga County residents.
- R 5-14: As described in the response to **Comment 5-10**, NYSDOT will not move forward with the skyway proposal.
- C 5-15: Route the future I-81 along the existing railroad right-of-way that travels through the south and west sides of Syracuse. This would allow for the Community Grid option while maintaining the

high speed I-81 through Syracuse. This would also eliminate the transport of toxic, flammable, and explosive materials by rail through the heart of the city.

- R 5-15: The existing railroad right-of-way is a narrow (less than 50-foot-wide) corridor that primarily accommodates one track. The width needed for a new I-81 would be about 100 feet for the highway, and upward of 300 feet to provide a sufficient buffer between the highway and adjacent uses. This concept would result in extensive land acquisition and displacement, including residential displacements, whereas the Community Grid Alternative would not require any residential displacements. Additionally, this concept would displace an active rail corridor, causing severe disruption to freight movement. Therefore, this concept was dismissed.
- C 5-16: Build the Community Grid and keep the viaduct for one direction of travel. Any excess space could be used for a pedestrian and bicycle path with parkland.
- R 5-16: There is no need to include a one-way viaduct as part of the Community Grid Alternative since the Community Grid Alternative would fully meet the needs and objectives of the Project.

5-4 OTHER POTENTIAL TRANSPORTATION ALTERNATIVES

- C 5-17: A Tunnel Alternative, which could include a Central Park, should be advanced.
- R 5-17: As detailed in **Section 3.3** and **Appendix B-1**, FHWA and NYSDOT evaluated and screened a range of potential alternatives and considered their ability to meet the Project objectives, constructability, and potential property impacts in addition to cost. As discussed in the April 2015 Scoping Report, the Tunnel Alternatives (T-1, T-2, T-3, and T-4) were evaluated, screened, and dismissed from further study. In response to public input after the publication of the Scoping Report, and as described in the Tunnel Feasibility Study (see **Appendix B-2** of the DDR/DEIS and FDR/FEIS), FHWA and NYSDOT conducted additional engineering and further analyses to determine whether a tunnel alternative that satisfies the Project's needs, meets the Project's purpose and objectives, and meets the established screening criteria could be developed.

Three new potential tunnel alternatives (T-5, T-6, and T-7) were developed (see the Tunnel Feasibility Study in **Appendix B-2**) and dismissed. In addition, the I-81 Independent Feasibility Study, conducted by an independent consultant, considered a "long list" of alternatives consisting of two potential depressed highway alternatives along the existing I-81 corridor and seven potential tunnel alternatives with various options. Based on the recommendation of this independent study, NYSDOT developed the Orange tunnel concept, which was also dismissed from further consideration (**Appendix B-3** contains the independent consultant's report, and **Appendix B-4** contains the results of the further study conducted by NYSDOT). Therefore, a tunnel alternative was deemed not reasonable and was dismissed from further consideration.

- C 5-18: Consider a depressed highway. This would allow east-west access and still facilitate a high-speed connection through the city.
- R 5-18: Potential Depressed Highway Alternatives were previously considered for the Project. However, both Depressed Highway Alternatives would remove local street connections thus decreasing connectivity, involve unfavorable subsurface conditions during construction, and would require the relocation of all utilities. Further, the potential Depressed Highway Alternatives would not meet the project purpose and objectives, nor would they address the identified transportation needs. For these reasons, the potential Depressed Highway Alternatives were not recommended for further study in the DDR/DEIS as presented in both the Scoping Report (April 2015) and in **Sections 3.2.5 and 3.3.1** of the DDR/DEIS and this FDR/FEIS.
- C 5-19: Consider a highway that would bypass the City to the west.
- R 5-19: A similar concept, Alternative O-2, described in **Section 3.2.6** of the DDR/DEIS and FDR/FEIS, was considered during the Project's scoping phase. This potential alternative would require a substantial amount of property acquisition, which is considered unreasonable. In addition, Alternative O-2 would substantially diminish local street connections in the West Street corridor, thereby failing to meet the Project's objective to "maintain or enhance the vehicular, pedestrian, and bicycle connections in the local street network within and near Downtown Syracuse to allow for connectivity between neighborhoods, business districts, and other key destinations." For these reasons, Alternative O-2 was dismissed from further consideration.
- C 5-20: An alternative or simultaneous project should be construction of an elevated skyway of electrically powered trains or similar conveyances (think Disney World, JFK Skytrain) circumnavigating in and around all urban and suburban areas. The current bus service would be supplemental to the greater "skyway" system. Current traffic bottlenecks and maintenance costs would be greatly reduced. School busing could be enhanced. Medical transports could operate unhindered by inefficient traffic patterns and management. Airport and Amway service would be cheap and efficient. Syracuse University would be fully connected to all City operations. A length of elevated rail could be bridged across the increasingly popular Onondaga Lake, facilitating commuter journeys to and from the city center. Coupled with the many current and future attractions, Syracuse will be a destination city and not just a quick drive through on a creaky rusting elevated hulk that is presently I-81.
- R 5-20: This proposal is outside the scope of the I-81 Viaduct Project.
- C 5-21: Consider an alternative that would connect southbound I-81 at Destiny Mall to eastbound and westbound I-690 via a bridge across Onondaga Lake.
- R 5-21: This proposal is outside the scope of the I-81 Viaduct Project.

C 5-22: Consider the “Cuse Train.” This plan envisions remote, suburban stations where vehicles can be parked and passengers board shuttles to Syracuse destinations. Technology improvements such as electric vehicles, driverless, and rideshare (e.g., Uber, Lyft, etc.) options can all serve to make the ‘Cuse Train a viable solution for traffic volume reduction and can serve to lessen the need for capacity building to meet future demand. The growing trend toward work from home also needs to be considered into future transportation planning though we suspect that it is too early to project the impacts of this trend onto the I-81 Viaduct Project.

R 5-22: This proposal is outside the scope of the I-81 Viaduct Project.

5-5 NON-TRANSPORTATION ALTERNATIVES

C 5-23: Leave the viaduct in place and convert to a park and recreational space.

R 5-23: This proposal is outside the scope of the I-81 Viaduct Project.

C 5-24: NYSDOT should keep the viaduct and use the funds to build quality housing.

R 5-24: This proposal is outside the scope of the I-81 Viaduct Project.

6 TRANSPORTATION CONSIDERATIONS

C 6-1: The Community Grid Alternative would result in traffic congestion within and around Syracuse. Furthermore, the SPECTRA Report, authored in 2019 by former NYSDOT Chief Engineer John Shafer, found that 61 intersections in the City of Syracuse would have a Level of Service (LOS) of E (severe congestion) or F (failure) during peak rush-hour periods. How can NYSDOT be dismissive of this report when it was authored by a former DOT engineer? Although the DOT has made changes to the Community Grid plan, data used has been questioned by some and many feel the problems described in the SPECTRA report were not fully addressed.

R 6-1: While traffic volumes would increase on local streets in the Downtown and University Hill areas as a result of the Community Grid Alternative, all but three of the more than 290 analysis locations in these areas would operate acceptably (at Level of Service D or better) upon completion of the Project (see **Section 5.6.1**). This is because improvements to increase capacity—in the form of additional roadways and intersections, widening of existing roadways, and the signalization of stop-controlled intersections—would be provided as appropriate to accommodate anticipated increases in traffic. At locations where physical capacity increases are not proposed, signal timing would be adjusted to improve traffic flows and maintain adequate operations. As a result of the targeted improvements, the number of locations operating at unacceptable Level of Service (defined as Level of Service E or F) would be reduced compared with the No Build Alternative, indicating an overall improvement in traffic operations and a lessening of congestion.

The Spectra report does not refer to the current version of the alternatives and associated analyses and therefore the conclusions made are not an accurate reflection of the expected performance of the Community Grid Alternative. The vast majority of intersections and freeway segments would operate acceptably (LOS D or better) under the Community Grid Alternative. The traffic simulations were developed and calibrated using industry best practices and the results indicate that the Community Grid Alternative would operate efficiently, adequately serve the transportation needs of the community, and meet the project needs and objectives.

C 6-2: NYSDOT has not explained how people will access various parts of the City once I-81 is removed.

R 6-2: NYSDOT would redesignate I-481 as the new I-81 and reconstruct Interchanges 16A and 29 to direct mainline traffic to the new I-81. The portion between Interchanges 16A and 29 would be designated as BL 81. The character of BL 81 would vary: it would be a high-speed freeway north of the City and south of Colvin Street, and a 30 mph City street from south of Martin Luther King, Jr. East (MLK, Jr. East) and I-690. Connections to every intersecting City street would be provided via normal intersections along the 30 mph section of BL 81. NYSDOT would also reconfigure interchanges along I-690 to between Leavenworth and Beech Streets

to improve safety and remove substandard features, and it would add an interchange at Crouse and Irving Avenues. Access downtown would be maintained along I-690 at Teall Avenue and a rebuilt West Street interchange. NYSDOT would make improvements along I-481 in accordance with its new designation as I-81 to accommodate additional capacity and alleviate congestion near Interchange 3. NYSDOT would not alter access to and from the New York State Thruway. Therefore, travel routes would generally be the same or improved with local traffic using BL 81 and through traffic using the re-routed I-81.

C 6-3: The Community Grid Alternative would increase travel times to and through Syracuse.

R 6-3: As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS, NYSDOT used industry standard traffic engineering and modeling methodologies to evaluate travel times for the Community Grid Alternative. Travel volumes were developed for highway segments throughout the Project Area and for more than 290 intersections in the Project Area. Existing traffic volumes were developed from the Project's data collection program, which included 24-hour automatic traffic recorder and turning movement counts. Available data previously assembled by Syracuse Metropolitan Transportation Council (SMTC) and NYSDOT for the I-81 Corridor Study also were used for the Project's traffic analyses. The primary tool used for forecasting future year traffic volumes was the SMTC regional travel demand model, which predicts traffic volumes as a result of the anticipated changes in land use, population, economic activity, and the transportation system. Travel time projections for 2026 and 2056 were developed using the traffic simulation software program VISSIM, which simulates traffic flow. VISSIM was used to compute the average travel time for all vehicles that traveled within a defined segment for a defined period.

The change in travel time between various origins and destinations would vary—some would increase, some would decrease, and others would remain essentially unchanged. The largest projected travel time increases would be approximately five or six minutes and would mostly involve trips to and from areas south of Syracuse. As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS and as shown in **Table 8-2**, the trips between the majority of origins and destinations (60 to 70 percent) would experience either no change or a decrease in travel time under the Community Grid Alternative compared with the No Build Alternative in the 2056 analysis year. Travel times between most of the other origins and destinations would increase by one or two minutes. Fewer than 10 percent of motorists would experience travel time increases greater than three minutes.

Under both the Viaduct and Community Grid Alternatives, the reliability of the transportation system would be greatly improved, as substandard highway features in the Project Area would be addressed (lack of standard shoulders, exits that are too close to one another, insufficient acceleration/deceleration lengths, etc.). Commuters traveling from the eastern suburbs to Downtown Syracuse under the Community Grid Alternative would not experience a substantial increase in travel distance, as they would generally travel on I-690 (which would be reconstructed from the West Street interchange to Beech Street) to destinations Downtown. As shown in **Table 8-2**, travel times from the eastern suburbs

(Fayetteville/Manlius) to Downtown areas would decrease by an estimated two minutes in the 2056 AM peak hour compared with the No Build Alternative. Travel times from Downtown to the eastern suburbs during the 2056 PM peak would decrease by an estimated four minutes compared with the No Build Alternative in the 2056 PM peak hour, as a result of improvements that would be made at Interchange 3 on the current I-481 (future I-81).

- C 6-4: Please provide a clear description of traffic volumes and travel times in the current condition and once the Community Grid Alternative is in place.
- R 6-4: **Appendix C-3** of the DDR/DEIS and FDR/FEIS provides volume maps for the existing and future conditions with completion of the Community Grid Alternative. **Table 8-2** of the DDR/DEIS and FDR/FEIS shows travel times to and from several locations in Onondaga County under existing conditions and with completion of the Community Grid Alternative.
- C 6-5: The Community Grid Alternative would increase travel times for emergency responders. Efficient access to hospitals should be a priority.
- R 6-5: The Community Grid Alternative would not adversely impact ambulance access or police and/or fire protection services. Traffic analyses show improved Level of Service within the Project limits under the Community Grid Alternative. St. Joseph's Hospital would benefit from more direct, high-speed access via the existing southbound I-81 exit ramp at Oswego Boulevard. Reduced congestion at the Almond Street intersections with Harrison and Adams Streets would improve mobility on the local street network through the geographic center of the City. The conversion of Harrison Street west of Almond Street, Adams Street west of State Street, and Crouse Avenue south of Genesee Street to two-way operation would provide emergency responders with many additional routing options. Travel times to and from points south of the Downtown area are expected to increase moderately under the Community Grid Alternative. However, a new intersection created at Almond Street and Van Buren Street would improve connectivity to the major hospitals on University Hill from points south, reducing travel distances and partially offsetting the impact of lower travel speeds through the area. Peak hour travel times within the Project Area and along popular routes used by emergency responders would decrease compared with the No Build Alternative in most cases. For additional information relating to impacts on police, fire protection, and ambulance access under the Community Grid Alternative, refer to **Section 5.6.1** of the DDR/DEIS and FDR/FEIS.
- C 6-6: Commuters from Camillus need good access to University Hill. Once the Harrison Street ramp is gone, access must be maintained.
- R 6-6: Under the Community Grid Alternative, commuters from Camillus would continue to use I-690 to reach University Hill via the new interchange at Crouse and Irving Avenues, and then travel south on Crouse Avenue to reach University Hill.

- C 6-7: Because the Community Grid Alternative will add traffic to city streets and increase walking and biking in areas of heavy traffic, there will be more accidents. Increased commercial traffic on rural roads will also diminish safety.
- R 6-7: The Project itself would not generate additional traffic and the traffic demand for the city street system would not change due to the Project. The Community Grid Alternative would redistribute traffic and some locations would experience an increase in traffic volume, while traffic volumes would decrease at other locations. The Community Grid Alternative was designed to accommodate the projected traffic patterns in a safe and efficient manner and includes many design improvements along the city street system.
- C 6-8: There must be a real-world simulation of traffic operations under the Community Grid Alternative before construction begins. Close 2 to 3 lanes of I-81 from Hiawatha Boulevard south to I-481 and see how it works.
- R 6-8: In order to minimize disruptions to the motoring public, and to accurately predict traffic operations with the proposed improvements in place, traffic simulations have been developed to test the alternative in a computer environment. The traffic simulations were developed and calibrated using industry best practices and the results indicate that the Community Grid Alternative will operate efficiently, adequately serve the transportation needs of the community, and meet the Project needs and objectives. **Chapter 5** of the DDR/DEIS and FDR/FEIS presents the result of the traffic analyses. In addition, the Community Grid Alternative does not include closing lanes from Hiawatha Boulevard, but rather improves the northern section of the proposed BL 81, creates new interchanges on the highway system, and improves many city streets to accommodate the redistributed traffic from the removal of the I-81 viaduct. See **Figures 5-32** through **5-35**, which capture the intersection level of service (congestion) for the Community Grid Alternative in both the AM and PM peak periods plus 30 years into the future.
- C 6-9: Truck traffic could increase through the Finger Lakes region with the Community Grid Alternative. The Project Area should be expanded to include areas south of the City of Syracuse to at least the Homer/Cortland exit. This area has not been properly evaluated to determine travel times using the new Interstate 81 (former Route 481) vs. travel times entering or existing Interstate 81 south of Syracuse to reach the Thruway west of Syracuse.
- Rerouting I-81 will increase transportation costs to truckers and the businesses that rely on the trucking industry. Westbound truckers coming from either direction on I-81 will have to either (a) travel on the longer express route or (b) travel on slower local roads not built for increased truck traffic. The results are increased fuel and toll costs, longer delivery times, and additional wear and tear on local roads. In either case, the increase costs will need to be absorbed by the trucking industry or passed on to consumers.
- R 6-9: Local routes through the Finger Lakes region have requirements for overweight or oversized permitting for truck traffic overseen by the local roadway jurisdictions, and those restrictions

would not be altered as part of the Project. As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS and as shown in **Tables 5-52** and **5-53**, using results of the regional model, a comparison of traffic exiting I-81 at New York State Route 20 with the Community Grid Alternative versus the No Build Alternative indicated a negligible number of traffic diversions along this route. As part of two separate projects, NYSDOT is planning to install a roundabout in Homer at the intersection of Route 281 and 41. NYSDOT is also analyzing the installation of roundabouts in Skaneateles at the intersections of Route 20 and 41A, plus Route 20 and 41. These safety projects will encourage large trucks to utilize the interstate highways as they are better suited for carrying trucks than non-interstate systems.

- C 6-10: Add a traffic light at the intersection of NYS Routes 41A and US 20 in Skaneateles.
- R 6-10: This proposal is outside the scope of the I-81 Viaduct Project.
- C 6-11: I-481 is already heavily trafficked and will not be able to accommodate the re-routed I-81 traffic. Increased traffic would increase noise and emissions and diminish quality of life for communities along this corridor. Even with the proposed improvements, capacity would not be enough. Three lanes in each direction should be added to the full extent of I-481. Clarify what percentage of the Community Grid's estimated \$1.9 billion budget will be dedicated to enhancing the highway, ramps and exits in the communities to the east and north of Syracuse to reduce the impacts of increased traffic, pollution and noise. Clarify if suburban municipal leaders have officially endorsed the proposed plan.
- R 6-11: Under the Community Grid Alternative, substantial improvements would be made to enhance highways and ramps in communities east and north of Syracuse, including along the existing I-481 corridor and the northern segment of existing I-81 (proposed BL 81); refer to **Section 3.4.3** for details. It is anticipated that approximately 25 percent of the estimated Project budget would be spent on the conversion of I-481 to I-81. The analyses performed as part of the EIS demonstrate that these improvements are sufficient to minimize traffic congestion and environmental impacts. Elected officials have been engaged throughout the Project and their feedback has been considered along with other feedback in accordance with the NEPA process.
- C 6-12: Additional traffic on the new I-81 (existing I-481) will lead to more accidents, particularly when combined with unpredictable weather and the numerous bridges along the I-481 corridor that are more hazardous in inclement weather.
- R 6-12: Many of the bridges in the Project Area are proposed to be replaced or rehabilitated, including many along I-481. In addition, other capacity and safety improvements are proposed along the I-481 corridor. Detailed information pertaining to the proposed improvements along the I-481 corridor are provided in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS. These improvements are designed to minimize the number of non-standard features and correct existing conditions that are known to contribute to accidents.

- C 6-13: Redirecting emergency traffic to the Crouse and Irving Avenues interchange will increase travel times, particularly from the western side of Onondaga County. The traffic analysis must consider the full route to the hospitals, including the increased use of congested local streets to reach them.
- R 6-13: As shown in **Table 5-48**, "No Build Alternative and Community Grid Alternative Origin-Destination Travel Times (Minutes)," travel times from the western suburbs (represented by the "Baldwinsville" origin) to University Hill would decrease compared to the No Build Alternative by 1 to 4 minutes depending on the year and peak hour considered. The Community Grid Alternative would improve travel times for roadway users making this connection because the bottlenecks and resulting congestion on I-81 and I-690 would be alleviated with the removal of the Harrison Street /Adams Street interchange and the I-81 viaduct. The Community Grid Alternative would provide direct access to the University Hill area from I-690 via Irving Avenue and Crouse Avenue.
- C 6-14: The Community Grid Alternative will negatively impact truck deliveries to the hospitals.
- R 6-14: Trucks would have access to the hospitals and University Hill from BL 81 or the new Crouse and Irving Avenues interchange on I-690. As shown in **Table 8-2** of the DDR/DEIS and FDR/FEIS, there is less than a one-minute increase in travel time to University Hill from locations throughout Onondaga County, and in many cases, the travel time is shorter. Therefore, the Community Grid Alternative would not adversely affect truck deliveries to the hospitals.
- C 6-15: Please identify the proposed cycle length for traffic signals, the time allowed for left turns, and the time allowed for pedestrian crossings.
- R 6-15: Cycle lengths would vary between 90 and 120 seconds in most locations. Cycle lengths would be sufficient to allow for pedestrian clearance based on a maximum walking speed of 3.5 feet/second at all crosswalks. Left turn protected phasing would be provided where needed and the times allotted would vary based on the traffic volume at each location. During final design, traffic signal timings would be optimized to safely and efficiently accommodate motorists, cyclists, and pedestrians.
- C 6-16: Provide more details about traffic volumes and travel patterns along the proposed south segment of BL 81 between I-481 and the MLK Jr., East roundabout.
- R 6-16: Refer to C-13: 2026 and 2056 Community Grid Alternative Freeway Traffic Volumes and Level of Service and C-3-14: 2026 and 2056 Community Grid Alternative Intersection Traffic Volumes.
- C 6-17: How effective will a roundabout be during peak periods?

- R 6-17: Traffic studies were performed for the proposed roundabout at BL 81 and Van Buren Street, and it would operate acceptably (LOS D or better) during peak hours under projected opening year and horizon year (2056) traffic volumes.
- C 6-18: Consider a signalized intersection at BL 81 and MLK Jr., East instead of a roundabout. Drivers are not familiar with roundabouts.
- R 6-18: As explained in **Section 3.4.3** of this FDR/FEIS, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East. (Refer to this section for more information about the proposed roundabout at Van Buren and other changes at MLK, Jr. East). Roundabouts operate efficiently and safely.
- C 6-19: Traffic signals on the new grid must be synchronized to improve traffic flow.
- R 6-19: Traffic signals on the new grid would be interconnected as part of a coordinated system, as much as practical, to optimize traffic progression and minimize the number of stops and delay that would be experienced by drivers.
- C 6-20: Another way to improve traffic in the city is to reduce the number of traffic lights and synchronize them. I would even like to suggest adding a yellow ""bus only"" turn arrow out of the hub. That light is too short for more than a bus or two to get through.
- R 6-20: Traffic signal phasing throughout the project limits will be evaluated during final design.
- C 6-21: Please describe the effects of increased traffic through Outer Comstock, on East Colvin Street, on the safety of children attending Syracuse Latin School.
- R 6-21: Traffic volumes are not projected to change significantly through residential areas of Outer Comstock. Traffic patterns on East Colvin Street would change as a result of the Project but would not increase east of BL 81. The new exit ramp from northbound BL 81 would add between 52 and 80 additional vehicles per hour heading eastbound on East Colvin Street during PM and AM peak periods, respectively, most of which would be destined to activity centers on the Syracuse University campuses via Comstock Avenue. The removal of the viaduct would reduce the amount of traffic using the Colvin Street entrance to northbound BL 81.
- C 6-22: As residents of the South Valley, we are very concerned about the Project's potential impact on the intersection of Seneca Turnpike at Brighton Avenue. This intersection fails during the morning and afternoon peak periods and should be improved.
- R 6-22: This intersection is outside of the Project limits. Substantial changes in traffic volumes are not projected to occur at the intersection of Seneca Turnpike and Brighton Avenue as a result of the project.

- C 6-23: Drivers from west of the Syracuse will have poor access to destinations south of Syracuse once the Community Grid Alternative is completed.
- R 6-23: Areas west of Syracuse could use I-690 to reach southbound BL 81. They would continue along southbound BL 81, which would be an arterial roadway from I-690 to MLK Jr., East and a limited-access high speed freeway between south of MLK, Jr. East and the BL 81/I-81 interchange (existing I-81/I-481 south interchange). As shown in **Table 8-2** of the DDR/DEIS and FDR/FEIS, drivers from Baldwinsville and points west would experience up to a four-minute increase in travel time to LaFayette in the 2056 analysis year.
- C 6-24: Add a third bridge over the CSX yard to increase capacity. The two existing bridges are too narrow to handle additional traffic.
- R 6-24: A third bridge over the CSX yard is not needed. As discussed in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS, proposed improvements near the CSX facility between Interchanges 4 and 5 include:
- A third southbound (auxiliary) lane would be provided between Kirkville Road (existing Interchange 5 southbound on-ramp) and I-690 (existing Interchange 4 southbound off-ramp) (see **Figure 3-37**).
 - A third northbound (auxiliary) lane would be provided between I-690 (existing Interchange 4 northbound on-ramp) and Kirkville Road (existing Interchange 5 northbound off-ramp), requiring a widening of the bridge over the CSX railroad tracks.
- C 6-25: The I-81/I-481 northern interchange is already heavily trafficked and will not be able to accommodate the re-routed I-81 traffic.
- R 6-25: The Project has been designed to accommodate travel demand, including re-routed I-81 traffic. The existing northern I-81/I-481 interchange (Interchange 29) would be reconstructed and would remain a fully directional interchange. The existing ramps that connect northbound I-481 to northbound I-81 and southbound I-81 to southbound I-481 would be demolished, and these movements would be made on the main line of re-designated I-81 (refer to Conversion of I-481 to I-81 in **Section 3.4.3** for further details).
- C 6-26: Interchange 3 must be improved to accommodate additional traffic. The new I-81 will further congest this area, especially if Shoppingtown becomes a more active destination.
- R 6-26: **Section 3.4.3** of the DDR/DEIS and FDR/FEIS describes proposed improvements at Interchange 3. The existing southbound I-481 to westbound Routes 5/92 exit ramp would be widened and improved to accommodate turns onto both westbound and eastbound Routes 5/92 under the Community Grid Alternative. The existing southbound I-481 to eastbound Routes 5/92 exit ramp would be removed. The improved southbound exit ramp would initially widen from one to two lanes and then transition to four lanes as it approaches Routes 5/92, where a new traffic signal would allow both left and right turns. In addition, the existing I-481

northbound entrance ramp from westbound Routes 5/92 would be lengthened substantially to improve vehicular merges. The intersection of New York State Routes 5 and 92 (Lyndon Corners) also would be improved with a traffic signal modifications and an additional lane. The new lane would begin approximately 600 feet west of the intersection and end on Route 92, approximately 1,000 feet east of the intersection (see **Figure 3-37** of the DDR/DEIS and FDR/FEIS). The Project has been designed to accommodate travel demand, including re-routed I-81 traffic.

- C 6-27: Given the rapid growth in the transportation industry, NYSDOT must re-evaluate alternatives to meet travel demand well into the future.
- R 6-27: **Chapter 5, Transportation and Engineering Considerations** of the DDR/DEIS and FDR/FEIS includes detailed analysis of travel demand for a 2056 design year. The traffic model incorporates anticipated changes in demographic and economic conditions in the region as well as planned transportation projects and development. Project alternatives have been designed to accommodate the projected traffic volumes.
- C 6-28: There must be improvements at Kirkville Road (Interchange 5) to accommodate the rerouting of traffic in combination with the new Amazon facility. NYSDOT's traffic analysis should account for the increase in freight movement on local highways due to increased online shopping and the impending new Amazon warehouse.
- R 6-28: NYSDOT has reviewed the traffic study reports associated with the Amazon facility development. Peak traffic generation hours for these developments do not coincide with the peak traffic hours analyzed for the I-81 project (i.e., most traffic generated by these developments would occur when background traffic volumes are lower than those analyzed for the I-81 Viaduct Project). In addition, NYSDOT's analyses included projected traffic volume growth for 30 years after the I-81 Viaduct Project is built. The I-81 traffic analyses for 2056 (ETC+30, see **Chapter 5** and **Appendix C-3** of the DDR/DEIS and FDR/FEIS) indicate that there would be enough excess capacity such that these developments would not be a concern with respect to the Project's design.
- C 6-29: If traffic is rerouted from I-81 to I-481, Interchange 1, which provides access to Syracuse University, the hospitals, and downtown, would experience increased traffic. The Outer Comstock neighborhood could also be negatively impacted by increased traffic on Comstock Avenue and Thurber Street, particularly truck traffic.
- R 6-29: Traffic volumes are not projected to increase on Thurber Street or Comstock Avenue south of East Colvin Street. Traffic making the connection from existing I-481 to northbound BL 81 would predominantly take the shortest path, which would entail exiting at Interchange 1, turning right on East Brighton Street, traveling on Brighton Street for a short distance, then making a left turn onto East Glen Avenue to access the northbound entrance ramp at the newly constructed interchange at Glen Avenue. Commuters to University Hill from the south would use the new exit ramp at Colvin Street. The ramp would provide a faster, more

convenient connection than available today that avoids the use of residential streets in the area south of Colvin Street.

- C 6-30: Please consider the effects of the traffic rerouting under the Community Grid Alternative on Nottingham Road. If more traffic uses the current Interchange 2, it will become more congested. It runs through a residential area and was not designed to carry heavy traffic.
- R 6-30: Traffic volumes are not projected to change substantially on Nottingham Road. Traffic making the connection from existing I-481 to northbound BL 81 would predominantly take the shortest path, which would entail exiting at Interchange 1, turning right on East Brighton Avenue, traveling on Brighton Avenue for a short distance then making a left turn onto East Glen Avenue to access the northbound entrance ramp at the newly constructed interchange at Glen Avenue. Commuting trips to University Hill from the south would be provided with an exit ramp at Colvin Street, which would provide for a faster more convenient connection that avoids the use of Nottingham Road and residential streets in the surrounding neighborhoods.
- C 6-31: The restructuring of the transportation network on the east side of Onondaga County that is occurring due to the Community Grid Alternative should include better use of I-90. Add an interchange somewhere between Kirkville Road in Town of Manlius to Lakeport Road in Town of Chittenango. This will alleviate the currently overburdened NYS Routes 5, 92, and 290, which will experience even more traffic under the Community Grid Alternative.
- R 6-31: I-90 (Thruway) is owned by the NYSTA. All improvements to the Thruway, including the addition of new entrances/exits, are beyond NYSDOT's jurisdiction.
- C 6-32: There is no guarantee that trucks will divert to I-481. They will use Almond Street and cause congestion.
- R 6-32: Under the Community Grid Alternative, trucks would be permitted to use I-81 (existing I-481) or BL 81. While traffic volumes would increase on local streets in the Downtown and University Hill areas as a result of the Community Grid Alternative, all but three of the more than 290 intersections analyzed in these areas would operate acceptably (at Level of Service D or better) upon completion of the Project (see **Section 5.6.1**). This is because improvements to increase capacity—in the form of additional roadways and intersections, widening of existing roadways, and the signalization of stop-controlled intersections—would be provided as appropriate to accommodate anticipated increases in traffic. At locations where physical capacity increases are not proposed, signal timing would be adjusted to improve traffic flows and maintain adequate operations. As a result of the targeted improvements, the number of locations operating at unacceptable Level of Service (defined as Level of Service E or F) would be reduced compared with the No Build Alternative, indicating an overall improvement in traffic operations and a lessening of congestion.
- C 6-33: I-81 through Syracuse should be closed in order to observe traffic conditions on I-481 with re-routed traffic.

- R 6-33: Accepted traffic modeling tools were used to assess future conditions. Closure of I-81 to assess potential future traffic conditions along I-481 is not required and would not provide a realistic representation of future traffic conditions, since other Project components (e.g., BL 81) would not be in place. Refer to **Chapter 5** and **Appendix C-2** for a description of the traffic analysis methodology and results.
- C 6-34: The Community Grid Alternative would increase traffic on East Colvin Street and in Outer Comstock, and the streets are not designed to handle it. Describe the improvements that will be implemented to mitigate the increase in traffic.
- R 6-34: Traffic volumes are not projected to change substantially through residential areas of Outer Comstock. Traffic patterns on East Colvin Street would change as a result of the Project but would not increase east of BL 81. The new exit ramp from northbound BL 81 would add between 52 and 80 additional vehicles per hour heading eastbound on East Colvin Street during PM and AM peak periods, respectively, most of which would be destined to activity centers on the Syracuse University campuses via Comstock Avenue. The removal of the viaduct would reduce the amount of traffic using the Colvin Street entrance to northbound BL 81.
- C 6-35: With the new roadway patterns under the Community Grid Alternative, will that prevent GPS users with older vehicles so equipped to be able to navigate through the city without getting lost by following the instructions given with their older vehicles?
- R 6-35: This is outside the scope of the Project. Standard guide signs will be included throughout the project to assist motorists.
- C 6-36: The Community Grid Alternative would eliminate surface parking located beneath the existing viaduct in Downtown Syracuse.
- R 6-36: As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative would result in a loss of 1,089 public off-street parking spaces, which include spaces used by employees at the New York State Office Building. A variety of potential options were evaluated to mitigate the loss of public off-street parking spaces, including the replacement of existing parking facilities and the development of new surface parking lots. Locations were considered that would not require additional property takings, would not be desirable for commercial development, and would not impact City zoning, or any potential new greenspace or gateway-type areas. All the lost parking would be mitigated.
- C 6-37: The businesses north of I-690 (including Destiny USA) complain of lost traffic and revenues assuming that most of the through northbound traffic will take what is now I-481, rejoining the current I-81 well north of the city. However, people who want to go to Destiny (or stop there on their way further north) could take what is now I-481 as far as I-690, then get off, head for the connection to what is now I-81 north, and quite conveniently make their way to Destiny or

any other business north of Downtown. This would not take much more time than it does with current routing of I-81 through the City.

R 6-37: Comment noted.

C 6-38: The Community Grid Alternative would result in traffic congestion within and around Syracuse. Provide a detailed description of the future traffic calculations and methodology for the Community Grid Alternative. Projected increases in traffic over the next 100 years should be provided and estimates should err on the high side with the hope of growth in Syracuse. Would NYSDOT welcome objective traffic professionals to verify and/or debate its traffic calculations?

R 6-38: As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS, NYSDOT used industry standard traffic engineering and modeling methodologies to evaluate traffic conditions for the Community Grid Alternative. Existing traffic volumes were developed from the Project's data collection program, which included 24-hour automatic traffic recorder and turning movement counts, and other available data sources; these were validated periodically using NYSDOT annual updated traffic volume information. Future year traffic volumes were forecasted using the SMTc regional travel demand model as further calibrated for the I-81 Viaduct Project (the "I-81 Project Travel Demand Model"). This model predicts traffic volumes as a result of the anticipated changes in land use, population, economic activity, and the transportation system. Levels of service, speeds, and travel time projections were developed for the Project's estimated time of completion and design years (2026 and 2056) using the VISSIM microsimulation software program. (See **Appendix C-2**, VISSIM Development and Calibration Report.)

Traffic projections for the next 100 years are not undertaken due to too many unknown factors over that time. Analyzing the year of completion and 30 years into the future is consistent with NYSDOT traffic analysis procedures for bridge projects, consistent with NYSDOT's Project Development Manual, Appendix 5.

C 6-39: There is no information about how you access the airport under the Community Grid Alternative.

R 6-39: BL 81 would operate as a limited access highway from I-690 north to its interchange with I-81 (existing Interchange 29). There are no planned changes to Interchange 27, which provides access from the current I-81 (proposed BL 81) to the airport.

C 6-40: Please examine plans for BL 81 at Brighton Avenue. There is already congestion in this area with lots of traffic headed to Intrepid Lane and Seneca Turnpike.

R 6-40: Traffic volumes are not projected to change significantly at the intersection of Brighton Avenue and Seneca Turnpike. Traffic making the connection from existing I-481 to northbound BL 81 would predominantly take the shortest path, which would entail exiting at Interchange 1, turning right on East Brighton Avenue, traveling on Brighton Avenue for a short distance, then

making a left turn onto East Glen Avenue to access the northbound entrance ramp at the newly constructed interchange at Glen Avenue. Commuting trips to University Hill from the south would be provided with an exit ramp at Colvin Street, which would provide for a faster, more convenient connection that avoids the use of residential streets in the area south of Colvin Street.

- C 6-41: The Community Grid Alternative will substantially increase travel time from the Northside by removing the I-81 and I-690 entrance and exits.
- R 6-41: With the Community Grid Alternative, I-690 will remain in its existing alignment and will intersect with BL 81. To travel south, vehicles can use I-690 and exist on West Street, exit at the new interchange at Course and Irving Avenues and proceed south on local streets, or continue on I-690 to I-481 (future I-81) and travel south, as can be done today.
- C 6-42: If Onondaga County wishes to draw in businesses to the northwestern section of the County, Routes 57 and 11 will need renovation to both the pavement and the traffic flow systems.
- R 6-42: This is outside the scope of the I-81 Viaduct Project.
- C 6-43: The Community Grid Alternative will hinder access to the new aquarium.
- R 6-43: The traffic projections indicate that the Community Grid Alternative would operate efficiently, adequately serve the transportation needs of the community and meet the Project needs and objectives. The Community Grid Alternative proposes improvements to Hiawatha Boulevard, Bear Street, and the freeway ramp connections from BL 81 to the Inner Harbor. Traffic congestion is not expected to impede travel to and from attractions within the Inner Harbor or other major destinations in the City of Syracuse.
- C 6-44: All city streets should have a 30 MPH speed limit.
- R 6-44: All city streets included in the I-81 Viaduct Project will be designed to maintain a 30-mph posted speed.
- C 6-45: Syracuse University traffic congestion would increase, particularly during major events, and the removal of Renwick Avenue access to Van Buren Street would reduce options for Dome traffic.
- R 6-45: As discussed in **Section 5.6.1**, total trips to and from Syracuse University and Dome events would be similar under the No Build and Community Grid Alternatives. Delays experienced at the conclusion of special events are largely associated with bottlenecks formed at the exit points at event parking facilities due to internal circulation within the parking facilities and the intersections at major exit points. Current delays at sporting events would be similar under the Community Grid Alternative because the Project does not propose altering parking access points or the internal circulation within the major parking facilities. Under the Community Grid

Alternative, Renwick Avenue would be removed in name only. In actuality, this two-lane street would be replaced by a four-lane street (BL 81), and the intersection between BL 81 and Van Buren Street would be greatly improved, including the addition of a traffic signal that would improve traffic operations. In addition, a new exit ramp from northbound BL 81 at Colvin Street has been added to the Community Grid Alternative, which would further improve accommodations for special event traffic during major Dome events.

The Community Grid Alternative would improve access to South Campus at Syracuse University with a new connection at Colvin Street from BL 81, which is described in **Section 3.4.3** of the DDR/DEIS and FDR/FEIS.

- C 6-46: As currently exists, WB Burnet Ave. motorists can only turn right onto State and oftentimes occupy the right turn lane from NB State onto EB James Street. This results in potential hazard when the motorist wishes to travel NB but is in a right turn only lane, not to mention foreclosing a right on red option (though I can't remember if that is a legal move currently). Can this be resolved in this BL81 project? As there will likely be additional traffic through the James and State intersection, it seems it might be prudent to address this issue if possible. It seems to me that Burnet Ave. will see additional volume under the Community Grid Alternative and that evaluating potential issues and opportunities related to Burnet Ave and the State Street/James/Burnet intersection may be in order. After all Burnet Ave is a significant parallel collector on the north side of I-690 and would seem to be playing a larger role as Erie Blvd and I-690 will become key links in the BL81 chain. It may be useful to consider options such as making Burnet Ave between State and N. Townsend one-way EB only; or perhaps allowing WB Burnet to left turn at State intersection—a move, however, that may overly complicate integration with James/State movements.
- R 6-46: Based on the detailed traffic studies for the Project, this intersection would operate well in 2056 in both the AM and PM peak hours under the Community Grid Alternative, which would retain the existing configuration. Therefore, these modifications are not being considered.
- C 6-47: Due to the DOT recently removing two lanes on Erie Boulevard, one on each side and also some left turn lanes were shortened and/or done away with for the new bike path. This has already caused traffic issues and delays this will become even worse because of the community grid. Was this and the other upcoming changes that have already been planned and/or started in Syracuse and Dewitt considered for this community grid option.
- R 6-47: The Empire State Trail improvements to Erie Boulevard are part of a separate, independent project. Planned and funded projects such as the Empire State Trail improvements are incorporated into the regional travel demand forecast model (the I-81 Project Travel Demand Model) that has been used in this Project.
- C 6-48: The proposed Canal District seems to pose a potential for significant delay although LOS analysis shows James Street intersections as 'B' and 'C'. Travelers using James Street to travel across downtown will experience an additional traffic signal (and potential delay) at the

new Pearl Street intersection in the short span from State Street to Salina Street. In addition, the intersection at Oswego Boulevard will include an additional leg under the grid plans as proposed. Are there alternatives to this multi-signalized stretch short of the viaduct that will be removed? What is proposed to mitigate what appears to be an adverse outcome for travelers using James Street in this area?

- R 6-48: The addition of a traffic signal would not result in an adverse outcome for travelers using James Street in that area and would result in an improvement for many users as it would increase connectivity.
- C 6-49: As someone who has driven this stretch of road literally thousands of times the last 15 plus years, I can tell you your "projected" travel times are not going to be accurate in reality. Your times are based on "models" that I doubt ran hundreds of multiple scenarios, and even then, are based on a "model." As those of us living in CNY know, we see weather "models" all the time predicting what will "happen." Time and again we have seen how utterly wrong these models can be. Stop giving in to the Eds. and Meds. on the hill and restore the elevated highway as intended for its original purpose.
- R 6-49: As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS, NYSDOT used industry standard traffic engineering and modeling methodologies to evaluate travel times for the Community Grid Alternative. Travel time projections for 2026 and 2056 were developed using the traffic simulation software program VISSIM, which simulates traffic flow. VISSIM was used to compute the average travel time for all vehicles that traveled within a defined segment for a defined period. As discussed in **Appendix C-2, Vissim Development and Calibration Report**, the VISSIM models account for variability of numerous parameters including traffic demand, driver behavior, and many others. Accordingly, multiple model runs were performed and the results were averaged to determine the travel times.
- C 6-50: There will be speeding vehicles that will not slow down on city streets under the Community Grid Alternative.
- R 6-50: As the highway approaches the city, posted speeds will decrease gradually, reaching 30 mph prior to MLK, Jr. East. In addition, the highway will be designed with traffic calming measures, such as S-curves and other physical features, to slow down motorists. Once BL 81 enters the city, other traffic calming measures, such as the roundabout at Van Buren Street, traffic signals, on-street parking, bicycle facilities and pedestrian crosswalks, landscaping, and other features would further encourage motorists to drive at the speed limit. Speed enforcement is the responsibility of the Syracuse Police Department.
- C 6-51: The proposed at grade system for I-81 going through downtown does not provide a connection for the existing path between I-90 to the west and I-81 to the south. This is a very popular through route that is not being accommodated by the preferred alternative. If coming eastbound from Thruway Exit 39 on I-690, where would you exit I-690 to reach I-81 southbound toward Cortland? It is not reasonable to expect these drivers to take either I-90

or I-690 all the way to the current I-481 alignment to head south. None of the proposed exit ramps on I-690 eastbound near downtown would connect you to I-81 southbound without going through local streets. The reverse is also true, there are no good connections from the proposed surface arterial to access I-690 westbound.

- R 6-51: To get to Cortland from areas west of Syracuse using the interstate system, a motorist would either exit at I-90 Exit 39 to access I-690, travel on eastbound I-690 to the new I-81 (existing I-481), then travel southward. Alternatively, the motorist could exit at I-90 Exit 34a and travel south on new I-81.
- C 6-52: NYSDOT's estimates of commute times from the east to various locations are unrealistic. NYSDOT asserts that travel times from the east will be improved in most scenarios from its published data. Yet, at the same time Mark Frechette, as quoted in the Syracuse Post-Standard (Sept. 19, 2021) acknowledged that traffic won't flow much better. The Post-Standard notes, "the proposed changes along that corridor (Lyndon Corners/Genesee St. will bring some SLIGHT congestion relief AFTER construction is done" (p. A4). Of course, for the period of time construction is occurring along the corridor, commute times will worsen, and NYSDOT acknowledges that any slight improvement along the corridor will only be temporary. Minimal transit improvements from Lyndon Corners is mitigated by increased traffic on I-481 onto I-690. So the travel time improvement claims appear to be unrealistic by NYSDOT's own data and its claims to the contrary seem to be deceptive at best.
- R 6-52: The proposed improvements at the Route 5/92 intersection at Lyndon Corners are minor compared to the scale of the entire Project. The projected travel time benefits from the east to various locations are realized as a result of the major work that is proposed along the I-690 and existing I-481 corridors as well as the arterial streets, which connect the freeways to major destinations throughout the Syracuse metropolitan area. The Project would not preclude transportation upgrades to the Genesee Street corridor as part of future projects.
- C 6-53: This is only going to increase more traffic on I-81 coming up north into Oswego County and surrounding towns like Brewerton, Central Square, Cicero etc. where traffic is pretty much condensed as it is.
- R 6-53: These locations are beyond the area affected by the Project, as the Project would not affect traffic patterns north of the I-81/I-481 Northern Interchange.
- C 6-54: As a resident and owner-occupant in Syracuse's Hawley Green neighborhood, I am most concerned about the impact of the proposed I-81 community grid plan (specifically the I-690 interchange at Crouse Ave) on the character, livability, and traffic flow in the Hawley Green neighborhood. There were previous NYS DOT analyses of traffic volume and traffic patterns south of Burnet Avenue; however, there has been little analysis of the impact of the proposed Crouse Ave off ramp on the neighborhood north of Burnet Ave (Crouse Ave from Burnet Ave to Lodi Street and Lodi Street from Burnet Ave to James Street). The Crouse Ave/Lodi Street, Lodi Street/Gertrude Street, Lodi Street/Burnet Ave, and Lodi Street/James Street

intersections are already difficult to navigate during rush hour due to the volume of vehicles, bicycles, and pedestrians, and adding additional traffic on to Crouse Ave from an I-690 off ramp has the potential to increase traffic congestion in the neighborhood significantly.

- R 6-54: The traffic study performed for the Project does include an analysis of intersections in locations north of Burnet Avenue including Lodi Street, North Crouse Avenue, and James Street. The traffic projections show that the vast majority of commuter traffic using the I-690 interchange at Crouse and Irving Avenues are traveling to and from the major destinations and employment centers to the south of I-690. There is not expected to be appreciable increases in through traffic in the Hawley Green neighborhood as a result of the new interchange at Crouse and Irving. Internal circulation patterns may shift as local residents will have convenient access to a new I-690 connection at Crouse and Irving Avenues that was not previously provided. These local traffic shifts will be subtle and the existing street system will be sufficient to serve the projected traffic in the area in an efficient manner.
- C 6-55: Ainsley Drive is an unimproved road, old Indian path, cannot handle extra traffic, no sidewalks anywhere. Outer Comstock neighborhood will be cut off, road system outside of the pretty pix do not show what the current state of the road system is really like. Where exactly would the exit at Colvin St. be located? If traffic dumps onto Colvin itself, there is no way that can be managed with the current housing all up and down the highway, and Oakwood Cemetery, a school off E. Colvin, the University traffic.
- R 6-55: Ainsley Drive, which is north of Brighton Avenue, would not be affected by the Community Grid Alternative and would not need to carry any additional traffic. Outer Comstock would not be cut off by the Community Grid Alternative. However, the Project would result in more traffic on Colvin Street, which has been analyzed and found to have adequate capacity to accommodate this traffic. The new BL 81 exit to Colvin Street would be located opposite of the existing on ramp. Note that a new traffic signal would be installed on Colvin Street at this location.
- C 6-56: There was vague discussion of adding a lane on eastbound East Genesee Street at the Ambergate base of the DeWittshire neighborhood to both service an expanded "Rt 81" on-ramp as well as to handle the increased flow of idling cars at the new traffic light. No specific answers were given in regards to the encroachment into the DeWittshire neighborhood which is necessary in order gain that space.
- R 6-56: As shown on sheet GP-CG-H6-19 in the plans in **Appendix A-1**, the existing curb line would be moved about 17 feet in order to lengthen the southbound I-81 entrance ramp; however, the existing stone pillars would not be impacted. A small amount of right-of-way (less than 700 square feet) would be acquired to reestablish the sidewalk connection along the south side of Route 5.
- C 6-57: After attending the public session at Mott Road Elementary School, I was struck by how little attention been paid to the effects of the project on I-481. It was striking that of all of the charts,

smart boards and posters lining the periphery of the room, there was but a single board in the center of the room devoted to I-481. The problem is that although all of the focus has been to what the ""Community Grid"" will do FOR the City of Syracuse, little is devoted to what the redirection of traffic flow will do TO the communities bordering I-481. I focus on three elements here: the unrealistic travel time estimates the DOT has provided, the effect of increased traffic flow directed onto I-481, and the unanticipated secondary and tertiary effects of making I-481 the north-south Interstate thoroughfare. First is the increase of traffic flow onto I-481, which from the NYDOT staffers at Mott Road where expressed as 12,000 or more redirected onto I-481 coming from the south through the Rt. 5 (Genesee St.) intersection. What concerns me here is that in addition to adding to traffic volume on I-481, the traffic will include truck that are heading west. Now NYDOT would like trucks to continue up I-481 to the Thruway before heading west. BUT, truckers will save 20 miles or so in tolls if they take 690 west to where it intersects with the Thruway west off the Fairgrounds. This will affect traffic flow and commuting times from the east."

- R 6-57: The DDR/DEIS and FDR/FEIS consider both the benefits and impacts of the entire Project Area, including the City of Syracuse and the I-481 corridor. Although traffic would increase on the redesignated portion of I-81 (existing I-481), traffic volumes are not expected to change at Mott Road or Route 5/92. Improvements proposed by the Project would improve travel times between these locations in the majority of cases. The traffic study prepared for the Project has accounted for changes in truck travel patterns that would result from the removal of the viaduct portion of I-81. Most trucks would utilize either BL 81 or the redesignated I-81 (existing I-481) to reach their destinations. The Project proposes transportation improvements along both of these corridors to account the anticipated shifts in travel.
- C 6-58: I have been to your public meetings...and hearings. When I ask questions no can give me an answer because they don't understand this part of land. I'm very concerned as to the impact of traffic thru our neighborhood streets. I live right on route 81 and near the exit of 481 to Brighton Ave. A lot of this traffic is now coming thru the East Glen Ave cut thru. past Jaquith Industries over a bridge on 81, which follows a Private Road of Loretto Nursing home onto my street of Fillmore Avenue and it is a very, very steep hill. Traffic does not pay attention to stop signs numerous fenders benders have happened here...the littering is horrible (because of us complaining Loretto is finally keeping it somewhat clean) and cars speeding thru, cars back in and out of my driveway constantly during the day...due to no outlet at the top of the hill. We have even had the city police here due some very concerning incidents with passing drivers. Tractor trailer trucks, trucks & buses have been coming thru and this is not a truck route. Vehicles come up or down the hill thru Loretto (East Glen Ave short cut) Also, noted at your meetings there is no noise impact barriers being considered, well come into yard and sit!!!! sometimes my house just rattles and the noise and the exhaust has gotten worse. I have not noted or seen anyone come to our neighborhood for any surveys or ask us our how this will impact our street of Fillmore Ave. We seem to be a forgotten part. Have tried in the past to have someone look into some of these concerns even better signage. Nothing happens.

- R 6-58: The existing driveway between East Glen Avenue and Fillmore Avenue is a private driveway, owned by Loretto. NYSDOT is working with Loretto to explore driveway connection options and how best to address concerns related to cut-through traffic expressed by adjacent residents.
- C 6-59: With traffic routed along I-481 (the new I-81) under the Community Grid Alternative, traffic will increase at the Kirkville Road exit and along Franklin Park Drive in East Syracuse with travelers accessing the Carrier Circle complex of hotels and other businesses. This will disturb the peace and tranquility of the Franklin Park neighborhood. To avoid this, the current I-481 interchange for I-90 and the I-481 interchange for NY 298 should be emphasized as exits to best access the Carrier Circle complex.
- R 6-59: Traffic patterns and volumes in the Franklin Park neighborhood would not change as a result of the Project. There would be additional traffic along I-481 (the new I-81) traveling through the Kirkville Road interchange on the interstate, but additional exiting traffic is not expected as a result of the Project.
- C 6-60: With all the talk of mitigating traffic flow around the Fayetteville/Dewitt exit (481 exit 3), there has been nothing said about how the increased traffic will be handled in the Northern suburbs. My primary concern is the stretch of 481 North between the Thruway exit and the entrance back onto 81 North. Rt 481 gets very congested during the rush hours, with many cars entering from Northern Blvd. With only two lanes heading north, there will be many close calls and collisions from people getting on 481 there and those who need to get onto 81 just a short distance away. Has there been any thought put into how to make that area safer?
- R 6-60: Existing I-481, which will be designated as the new I-81 under the Community Grid Alternative, has been designed with sufficient capacity to accommodate traffic demand. Further improvements to Northern Boulevard or the Northern Boulevard interchange are not warranted (refer to **Table 5-52**, which presents results of the level of service analysis for the interchange).
- C 6-61: When I-81 is routed along the existing I-481 under the Community Grid Alternative, travel delays -- which are already substantial -- will increase during times of routine construction along the future I-81 due to the combined traffic.
- R 6-61: As described in **Chapter 4**, the improvements to I-481 would be completed prior to the demolition of the viaduct. Future construction on the new I-81, years after completion of this project, would have to be performed after the development of a comprehensive maintenance of traffic plan that efficiently and safely handles the traffic needs at that time.
- C 6-62: At Interchange 3 along existing I-481, the proposed improvements should include a second right-hand turning lane for westbound traffic on Route 5/92 to avoid traffic queuing onto I-481 (future I-81) as occurs at the current I-481 southbound exit to Route 5/92 westbound.

R 6-62: Two right-hand turning lanes are not needed. The projected travel demand would be accommodated, without backups onto the freeway, with the proposed traffic signal and a single lane for westbound traffic.

C 6-63: As one who has lived in several states in the Northeast and multiple places in NY, I have come to appreciate the ease and lack of traffic in Syracuse. I run a branch in Liverpool and many of my clients come from all sides of Syracuse and the suburbs. Down the road from me, Amazon has opened the country's second largest warehouse which will employ over 1000 people, many of whom will come from all parts of Syracuse. I also bring my child to school and back for which I use 81 to travel.

1.). What considerations have been made in the plan for the increased traffic on 81, the Onondaga Lake Pkwy, and downtown Liverpool to handle the increased traffic? There is also a proposal that will make it even worse by reducing lanes on Onondaga Lake Pkwy.

2.). What emergency procedures will be put in place to deviate traffics from 481 if there is a major accident now that 81 can no longer handle the overflow?

3.). What is the estimated clearing out time and procedure of a sold out SU game to get everyone out in a safe and timely manner?

There are numerous other issues this will create.

R 6-63: 1) NYSDOT has reviewed the traffic study reports associated with the Amazon facility development. Peak traffic generation hours for these developments do not coincide with the peak traffic hours analyzed for the Project (i.e., most traffic generated by these developments would occur when background traffic volumes are lower than those analyzed for the Project). In addition, NYSDOT's analyses included projected traffic volume growth for 30 years after the Project is built. The I-81 traffic analyses for 2056 (ETC+30, see **Chapter 5** and **Appendix C-3** of the DDR/DEIS and FDR/FEIS) indicate that there would be enough excess capacity such that these developments would not be a concern with respect to the Project's design. 2) Under the Community Grid Alternative, the new I-81 (existing I-481) has been designed with additional capacity north of I-690; in other areas, if the roadway is closed because of a major accident, alternate routes would include BL 81 and local streets. In addition, safety improvements would be made to the new I-81 to decrease the frequency of crashes. 3) Finally, clearing out times from events at the Dome were not analyzed as part of the Project. For planning and design of roadways, design hour (or peak hour) traffic volumes are used as the basis to develop roadway capacity needs. As discussed in **Section 5.6.1**, total trips to and from Syracuse University and Dome events would be similar under the No Build and Community Grid Alternatives. Designing for such an event would result in an over-designed roadway system, and increased footprint and cost of the facilities. However, the major bottlenecks during events at the Dome are created by the circulation in parking facilities, including access/egress points (driveways) to enter and exit these facilities, which would not change as part of the Project. In addition, the Community Grid Alternative would provide new access points to Downtown and University Hill.

- C 6-64: The third element I see is that NYDOT takes no account of the secondary and tertiary effects of redirecting traffic onto I-481. NYDOT's own data and representatives acknowledge that when traffic arterials are developed, there is inevitable development along the arterial. We already know that Amazon's Distribution Center will add substantial traffic, much of which is not accounted for by the current NYDOT estimates. There's projected development of a microchip facility. One can only imagine that other concerns will be developed along the I-481 corridor as it becomes the main transit artery for north-south traffic. My point here is that once you make I-481 the north-south thoroughfare route, additional development will occur along its corridor that will further affect traffic flow from the eastern suburbs.
- R 6-64: Additional trips associated with planned developments were considered and accounted for during the design and evaluation of the Community Grid Alternative. NYSDOT has reviewed the traffic study reports associated with the Amazon facility development. Peak traffic generation hours for these developments do not coincide with the peak traffic hours analyzed for the Project (i.e., most traffic generated by these developments would occur when background traffic volumes are lower than those analyzed for the Project). In addition, NYSDOT's analyses included projected traffic volume growth for 30 years after the Project is built. The I-81 traffic analyses for 2056 (ETC+30, see **Chapter 5** and **Appendix C-3** of the DDR/DEIS and FDR/FEIS) indicate that there would be enough excess capacity such that these developments would not be a concern with respect to the Project's design.
- C 6-65: Traffic passing through the Loretto property and into the surrounding neighborhood has increased over time, and will get worse with the Community Grid Alternative. The traffic will accelerate wear and tear of roadways and increase air pollution and noise.
- R 6-65: As described in **Section 3.4.3**, under the Community Grid Alternative southbound travelers on BL 81 would either access southbound I-81 or exit to a new ramp leading to East Glen Avenue; this ramp would connect to Brighton Avenue and Rock Cut Road. Travelers on the new southbound I-81 would access BL 81 via the existing exit ramp to Brighton Avenue, continuing straight onto East Glen Avenue, which would lead to the entrance ramp to northbound BL 81 or to the entrance ramp to southbound I-81. Based on public comment, the design of the interchange has been modified to include a new ramp providing a direct connection for motorists traveling between southbound BL 81 and northbound I-81. Finally, motorists heading from Brighton Avenue to northbound I-81 would use the Rock Cut Road entrance ramp, which would remain in its current location, or use East Glen Avenue to take the new entrance ramp to southbound I-81. Motorists on Brighton Avenue heading toward Downtown would use East Glen Avenue and the new northbound BL 81 entrance ramp.
- East Glen Avenue, which would be relocated, would be a public street between the Loretto property and Brighton Avenue and would include a full interchange with BL 81, substantially improving access at that location. The Project would have no effect on the private driveway between East Glen Avenue and Fillmore Avenue, owned by Loretto; access to either end of the driveway would be maintained throughout construction and upon completion of the Project. NYSDOT is working with Loretto to explore driveway connection options and how

best to address concerns related to cut-through traffic expressed by adjacent residents. Further, the improvements proposed as part of the Project, including the new full interchange on relocated East Glen Avenue, would substantially improve access to the highway system (both BL 81 and I-81). No public roads or public access to and from Brighton Avenue or East Glen Avenue or relocated East Glen Avenue would be removed as part of the Community Grid Alternative.

Relocated East Glen Avenue, including the new interchange at BL 81 and the reconstructed intersection with Brighton Avenue, has been designed to accommodate projected traffic volumes. The design would improve emergency vehicle access, as well as pedestrian, bicycle, and bus access to the Loretto property.

Potential impacts to air quality and traffic noise have been evaluated for the Project and are discussed in **Section 6-4-4** and **Section 6-4-6** of the DDR/DEIS and FDR/FEIS.

- C 6-66: Additionally, the environmental and traffic impact is considerable: those of us who must use E. Genesee Street on a daily basis already have times of heavy traffic and delays; this seems like it will be significantly increased when the Fayetteville exit is eliminated. More traffic also impacts the environment.
- R 6-66: The Fayetteville exit (Interchange 3E) is not being eliminated. It would be relocated and combined with Interchange 3W. The exit ramp would intersect East Genesee at a new traffic signal which would control traffic movements from the ramp to East Genesee Street. The combined ramp traffic and new traffic signal would eliminate a weaving section on the interstate and improve traffic control, resulting in improved traffic operations and safety at this interchange and along the Route 5/92 corridor.
- C 6-67: The manufacturing field is being ignored by the Project. We are a growing market, with new hires, expanded businesses, and more trips. These changes need to be considered.
- R 6-67: The I-81 Project Travel Demand Model accounts for increased trip activity associated with economic development in the region based on socio-economic and demographic (SED) data, including specific land use plans which are currently available. In addition, the travel demand model also considers the distribution of trips by purpose across geographic zones throughout the metropolitan area. The travel demand model was used to predict travel patterns changes that would result from changes to the transportation network proposed by the project alternatives. The analysis also included growth/projected travel demand in 2056 based on the SED data in the model.
- C 6-68: Last but not least, I love the idea to reconfigure Exit 3 from 481. I think having a single exit point will be better, I just hope that the exit ramp will be long enough to accommodate the volume of traffic that will have to wait at the red light to turn left onto 5 and 92. I also hope that traffic light sensors would be installed to the end of the ramp to ensure stopped traffic doesn't back up to the active highway driving lanes. Or maybe it would be easier to keep both (3E and 3W) exit ramps, but make westbound 5/92 traffic turn left to get on 481 (future 81) south, using

the existing eastbound onramp. If there is any data to suggest there is less traffic going this way, the red lights to allow such movements would be shorter than the red lights needed to let exiting traffic turn left onto 5/92.

- R 6-68: A detailed traffic study of this interchange area was performed, and several alternative interchange layouts were tested and evaluated to determine the optimal layout. The improvements that have been integrated into the Community Grid Alternative at this location were based on the results of that study. The existing eastbound Exit 3E loop ramp is associated with a high crash rate in several segments, including the area in which the ramp merges into Route 5/92, on I-481 between the on- and off-ramps, and north of the 3W exit, where traffic can back up to I-690. The proposed enhancements address these high crash areas and improve both operations and safety in the interchange area. The reconfiguration of Interchange 3 would substantially improve traffic operations for the existing heavy southbound I-481 to eastbound Route 92 movement. The proposed signalized intersection at the southbound I-481 exit (new I-81) ramp with Route 5/92 would be designed to accommodate projected traffic volumes and would operate at an acceptable Level of Service (LOS). In addition, the westbound Route 5/92 to southbound I-81 movement would not be affected by the proposed triple left turn and would actually be improved by the proposed design since it removes the existing weaving merge on I-81.
- C 6-69: The traffic study is based on outdated data. There's no sense of how the grid will impact key intersections, outside the very narrow study area established by the agency. The analysis presumes a growth rate that is completely inconsistent with recent data and dramatically understates the mobility performance of the grid option. It fails to address that only six percent of existing trips based on the old data are through trips that do not stop within the city or nearby destinations. It makes no sense to presume that a large portion of the 90,000 daily trips will drive 16 miles out of the way via I-481.
- R 6-69: For much of the Project Area, including the area where the viaduct would be removed, NYSDOT collected data in 2013 and therefore growth prior to 2013 was captured in the data. For some areas, older data was factored up to represent existing conditions using both a general 0.3 percent annual growth rate and the 2013 actual counts. Thus, the observed 2013 counts were used as the baseline for balancing traffic throughout the network. The I-81 Viaduct Project Travel Demand Model was used to develop traffic projections for the opening and design years of the Project. The model accounts for varying growth at different locations based on planned developments and land use changes. The Project's study area is sufficient to evaluate the effects of the Project on traffic operations. Beyond these limits, the Project would not affect traffic flow as substantial travel pattern changes due to the Project would occur within these limits only. **Figures 5-32 through 5-35** in the DDR/DEIS and FDR/FEIS show intersection LOS results for the Project. Traffic from the viaduct would redistribute to many other routes including the new I-81, the Crouse/Irving Avenue interchange, the new Colvin Street exit, and many other streets. Under existing conditions, much of the traffic generated by University Hill and Downtown travel through the Adams/Harrison Street

interchange, and this is why existing traffic volumes are very high along the viaduct/Almond Street corridor. Under the Community Grid Alternative, this traffic would disperse to the various routes noted above. Also, pass through traffic refers to traffic using I-81 with both origins and destinations north of the northern I-81/I-481 interchange and south of the southern I-81/I-481 interchange. There is substantial additional traffic that uses the viaduct to connect to I-690. For example, existing traffic may use northbound I-81/eastbound I-690 to access areas in East Syracuse and under the Community Grid Alternative, some of this traffic would use the new I-81/westbound I-690.

- C 6-70: I'm very concerned about the new exit or increase in the exit, the Dewitt exit currently now and the removal of the Fayetteville exit, the Cloverleaf, right, the impact that that's going to have on the neighborhoods there, the environmental impact, the noise impact and the additional traffic that's going to be there. It does not look like a proper plan, people can't answer -- cannot give answers regarding the environmental impacts that this is going to have.
- R 6-70: The southbound Exit 3E is not being eliminated under the Community Grid Alternative; it is being combined with Exit 3W. A detailed traffic study of this interchange area was performed, and the improvements that have been integrated into the Community Grid Alternative at this location were based on the results of that study. These improvements will enhance both the operations and safety on Route 5/92 and the I-481 (new I-81)/I-81 interchange area and would not result in adverse impacts to the environment or to the surrounding neighborhood.
- C 6-71: Traffic models did not include two key variables: human choice and increased future economic activity.
- R 6-71: The travel demand forecasting models developed for the Project do consider changes in trip patterns associated with increased economic development that is planned to occur in the future. In addition, the forecasting models include the capability to assess mode choice and trip assignment (based on the route which provides the lowest user cost) both of which are key aspects that influence traveler preferences.
- C 6-72: The first is the planned reconstruction of the Exit 3, which currently is Exit 3 from Interstate 481 and would then be Exit 3 exit of the future Interstate 81...What the plans has shown they were actually going to eliminate that Exit 3e and direct all traffic to get off at the -- what is now Exit 3w, 3 West. My understanding is they would turn that exit into a multi-lane affair with a traffic light at the end and I am convinced and other people that I've spoken with from the Town of DeWitt are convinced that that is just going to cause dangerous backups onto the highway as there used to be.
- R 6-72: A detailed traffic study of this interchange area was performed, and the improvements that have been integrated into the Community Grid Alternative at this location were based on the results of that study. These improvements will enhance both the operations and safety on Route 5/92 and the I-481 (new I-81)/I-81 interchange area, including eliminating the backups that currently exist on southbound I-481.

- C 6-73: The exit from the current I-81 to I-481 is very hazardous with a very tight radius.
- R 6-73: Both existing north and south I-81/I-481 interchanges would be completely reconstructed, as described in **Section 3.4.3**. However, the north interchange currently has one ramp, the northbound I-81 to northbound State Route 481, with a tight radius. While under the Community Grid Alternative this ramp will be modified to accommodate the mainline, there is insufficient space to lengthen or widen the ramp; speed advisory signs (at 25 mph), as is typical with cloverleaf interchanges, will be maintained for safe travel.
- C 6-74: As a resident that commutes to the City from the eastern suburbs, I believe this proposal falls far short in addressing the traffic impact at the exit to Rt. 5 from current I-481. I cannot support this project if the plan calls for a traffic signal to control the exit process on Rt. 5. THAT WILL BE A DISASTER! Going from 2 paths to exit onto Rt 5 (one east and one west) to a single one controlled by a signal will result in increased congestion and delay. What evidence is there to indicate this will improve the flow of traffic?
- R 6-74: A detailed traffic study of this interchange area was performed, and the improvements that have been integrated into the Community Grid Alternative at this location were based on the results of that study. These improvements will improve both the operations and safety on Routes 5/92 and the I-481 (new I-81)/I-81 interchange area.
- C 6-75: The Community Grid Alternative will increase traffic on local streets in the Northside which are not equipped to handle this traffic. The Project will also substantially increase travel times from the Northside to West Street, Downtown.
- R 6-75: The Butternut Street bridge would not be eliminated, but would be reconstructed, and would continue to connect to Franklin Street (as it does today), as part of the Community Grid Alternative (see **Section 3.4.3** of the DDR/DEIS and FDR/FEIS). The existing ramp connecting North Franklin Street and West Street would be eliminated, but motorists would be able to use North Franklin Street to West Genesee Street or Erie Boulevard, as well as other routes, to reach destinations to the west.
- C 6-76: As a resident of Manlius, I'm concerned with the plan to eliminate the current Eastbound 481 exit 3E cloverleaf and requiring all traffic to exit at the current exit 3W. Installing a light and requiring eastbound traffic to turn left even with 2 left hand turn lanes will be a nightmare. I don't see the rationale for changing the Southbound exit to rt 5.
- R 6-76: The existing eastbound exit 3E loop ramp is associated with a high crash rate in several segments, including the area in which the ramp merges into Routes 5/92, on I-481 between the on- and off-ramps, and north of the 3W exit, where traffic can back up to I-690. The proposed enhancements address these high crash areas and improve overall safety and operations within the interchange area.

- C 6-77: Rather than the 6-foot sidewalks shown on the bridge drawings and on the “General Plan”, make the entire non-vehicular area an attractively paved walking space with detailed paving pattern, pedestrian scale lighting and public art. Considerations such as these should be given to all locations where pedestrians are walking under the highway.
- R 6-77: Hardscape treatments in the sidewalk buffer areas would be refined during final design. Sidewalks would need to meet Public Rights-of-Way Accessibility Guidelines (PROWAG) standards.
- C 6-78: Something that will happen if the viaduct isn't maintained is that southbound traffic for trucks is going to be forced to use I-481 the old Rock Cut Road valley. The problem there is that the trucks are now left with one alternative for getting through the city if they're southbound. Whether they're coming from the west, whether they're coming from the north, whether they're locally generated, they're all going to be taking that route. And it is not out of the realm of possibility that there will be a major accident. And I do not mean because of the congestion, but because there will be a truck just carrying flammables. There's going to be an accident. It's going to shut the whole system down.
- R 6-78: If a major event occurs that requires the closure of new I-81 (existing I-481), traffic would be able to use BL 81 or detour to local routes until I-81 is reopened.
- C 6-79: Shown on the General Plan, south of the I-690 overpass, why is the proposed sidewalk not continuous where there is a driveway from the adjacent lot? Existing conditions are a continuous sidewalk. And across the street there is a similar situation with driveway access but the proposed sidewalk is continuous.
- R 6-79: Using a drop curb and extending the sidewalk across the existing driveway will be considered during final design.
- C 6-80: It is my understanding that the original plans for I-690 on the East was to extend through to the Town of Manlius area. The current situation with the off-ramps to nowhere on the eastern end, where it intersects with I-481, is the result of extreme negative pushback by local leaders. That part of the project was scrubbed as a result - and now we have a seemingly unsolvable bottleneck that snarls traffic at the interchange and exits 3N and 3S. That problem extends all along the Route 5 and Route 92 corridors.
- The complaints coming from the surrounding local communities as I have read and understand them seem to have the same short-sightedness and the emotional desire for things to stay as they are. In other words, their wish is to deny the undeniable progress of growth and its impact.
- Building for yesterday is not a solution for tomorrow.
- R 6-80: As described in **Section 3.4.3**, the Project includes improvements to the existing I-481 Interchange 3, as well as to Routes 5 and 92.

C 6-81: I-690 Over N. Franklin Street - Underpass and Street/Sidewalk Design - DEIS Reference Drawings Bridge Plans and Elevations CG-2-3142 (2 of 3) and CG-2-3143 (3 of 3).

- General Plan Clinton St Community Grid Alternative CommGrid Alt. GP-CG-590-01 and GP-CG-590-02A

We appreciate that on the bridge drawings there appears to be approximately 20 feet of clear space for pedestrians (and bicyclists) where N. Franklin Street passes under I-690 and the I-690 WB off ramp. As it exists now, our experience walking under 690 at Franklin Street almost daily is frightening, dangerous, dirty and in winter it can be impassable for weeks due to snow plowed from the street onto the sidewalk. The proposed width for pedestrians will provide support for a safer and more pleasant experience for the many people walking in this area, on both sides of the street.

We note the proposed on-street parking and anticipate that this will slow down passing cars and provide further protection for pedestrians, in addition to providing parking for local businesses. We wonder if the city will install parking meters. We recommend the following;

- Ensuring that the pedestrian zone remains clear of snow, road salt and standing water splashes throughout the year by installing some type of barrier, such as a low wall of 30" height about 4' in from the curb line."

R 6-81: While splash walls along City streets would not be provided, the drainage system in this area would be reconstructed to eliminate on-street ponding. In addition, the Project would increase the buffer between the curb line and the sidewalk and provide on-street parking, further buffering pedestrians from roadway splashes.

C 6-82: In conversations with several DOT representatives, it became abundantly clear that they are both unfamiliar with the local area and network of roads and patterns of lifestyles. A few potential outcomes are easily predictable based on human behavior:

1. As south and eastbound traffic backs up on Erie Blvd north of Kinne Rd due to the new traffic light on Rt 92, traffic will pour into the Orvilton neighborhood in order to move west on E Genesee St.
2. As residents of Fayetteville and Manlius attempt to avoid a 4-lane traffic light at the end of the exit ramp, they will choose to exit at Jamesville Rd and traverse east via Woodchuck Hill Rd—a road that is ill-equipped for an increase in traffic, especially at times of day that students and busses are accessing the high school.
3. There was no familiarity nor input regarding the added congestion to back-ups from the traffic light at the intersection of eastbound Rt 92 and Erie Blvd and the already congested intersection during peak hours at Jamesville Rd. In fact, these intersections do not even appear within the literature presented to the public.
4. Residents of Fayetteville will now seek alternative routes into the City of Syracuse via Kirkville Rd and Woodchuck Rd to avoid the 5 traffic lights on E Genesee St starting at Lyndon Corners through Jamesville Rd.

- R 6-82: Traffic patterns are not projected to change substantially on Kinne Road, Jamesville Road or through the Orvilton neighborhood as a result of the project. Queues would be confined to the blocks adjacent to the traffic signal and there is not expected to be substantial congestion or increases in cut-through traffic in surrounding neighborhoods. Therefore, the reconfiguration of the interchange is not expected to cause any adverse environmental effects on surrounding neighborhoods.

Note that an exit at Kinne Road is not needed as the proposed improvements would accommodate traffic flow and safety without it. Additionally, an exit to Kinne Road would not be feasible based on ramp spacing requirements relative to Interchanges 3 and 4.

The Route 5 and 92 corridor is one of the most heavily traveled corridors in the region and this project will not increase traffic volumes. The improvements proposed under the Community Grid Alternative would improve safety and operations on the corridor from the interchange with I-481 to Lyndon Corners. The Project would not preclude future improvements to the East Genesee and Erie Boulevard and Jamesville Road intersections.

- C 6-83: The Need to Design for Multi-modal transportation with different movement speeds and perceptual characteristics. The design to date as illustrated and documented in the DEIS is most developed and appropriate for moving vehicles at various speeds through the project area. The designs provided for the pedestrian oriented corridors and spaces are very stark and do not illustrate consideration for the perceptual characteristics needed to support and encourage people walking at 3 to 4 mph.

The pedestrian system as it is currently illustrated and described is based on “accommodation, connectivity and safety” (DEIS p5-184). These are reasonable and baseline objectives but do not acknowledge human behavior research of the perceptual characteristics of people walking. In designing a multi-modal system that supports and encourages all modes of transportation, there should be equal consideration and knowledge about the different needs and requirements of each mode. The DOT is skilled at designing corridors for motorized vehicles such as cars, trucks and buses but the current designs do not acknowledge a similar expertise with pedestrian oriented environments. In addition to the baseline objectives, environments that encourage, and support walking are characterized by more detail, interesting things to look at, environmental comfort, including shade, places to sit and possible gather, and an understanding of human scale.

There are numerous design characteristics that affect driving speeds, including the width of the vehicular lanes. Proposed lane widths on surface streets appear to be 12' minimum on many new or reconstructed streets. Contemporary standards for local streets recommend narrower lane widths, and we recommend 11' maximum widths to slow driving speeds. We have noted that the I-690 lanes in the vicinity of Franklin Square are shown on DEIS drawings as 12' wide, and we do not think that width is needed or appropriate for local streets.

- R 6-83: **Section 5.6.4, Landscape and Environmental Enhancements** addresses additional considerations for pedestrian corridors above and beyond the baseline objectives of accommodation, connectivity, and safety. **Section 5.6.4** describes the incorporation of

landscaping and other aesthetic improvements to provide for environmental comfort, visual cohesiveness and to help facilitate social interaction. Additional enhancements are described for specific locations that would create areas of interest and potential gathering spaces. These include the West Street and Genesee Street Gateway, the Clinton Street Gateway, the Van Buren Street Gateway, and the Northern Gateway, which includes the proposed Canal District. The design concepts and possibilities for these enhancements would be developed and refined, in consideration of public input, during the final design phase of the Project. As explained in response to **Comment 4-43**, BL 81 would be designed with the physical characteristics of a Qualifying Highway to accommodate large, heavy vehicles along its length. These characteristics include appropriate horizontal and vertical alignments, lane widths (12 feet wide), turning radii, sight distance, and auxiliary lanes with acceleration/deceleration lanes of sufficient length and storage (see Design Criteria Tables in **Appendix C-6** for more information about design characteristics).

- C 6-84: The Community Grid must be designed for maximum pedestrian accessibility and safety. ARISE would like to meet with the NYSDOT officials that will be designing the streetscape surrounding the Community Grid's ground-level boulevard. The entire boulevard must be accessible, designed with all necessary pedestrian safety equipment such as crosswalks, audible and visible crossing equipment and necessary curb cuts. NYSDOT and all relevant city agencies, such as those responsible for alternative transportation and the city's new municipal sidewalk program should join with ARISE and active pedestrians in high trafficked areas such as James St. and Townsend and E. Colvin and State/Salina to discuss needs for their neighborhoods.
- R 6-84: Final design plans for the Project will abide by all pertinent federal and state accessibility bicycle, pedestrian, and traffic signal guidelines. These include PROWAG and the Highway Design Manual Chapter 18 (Pedestrian Facility Design).
- C 6-85: Pedestrian and Bicycle Paths: Safety of cyclists and pedestrians is a vitally important. We recommend the configuration of all pedestrian and bicycle paths be evaluated with community input. Also consider the elimination of shared lanes by vehicles and cyclists. Safety and security on these pathways are paramount and should not be ignored or downplayed.
- R 6-85: The proposed bicycle plans and pedestrian amenities were included in the DDR/DEIS, which was circulated for public review and comment, and have been shared with the public at multiple public meetings. The Project includes off-road cycle tracks and shared use paths wherever right-of-way allowed; however, where right-of-way and physical constraints do not allow the creation of cycle tracks or shared use paths, shared vehicle and bicycle lanes were provided in accordance with the AASHTO Guide for the Development of Bicycle Facilities.
- C 6-86: I am one hundred percent pro-grid, I really like everything that I've seen. The only concern that I have is the southbound portion or, I'm sorry, the southern portion of the business loop, from where it would break off from 81 to where it gets to the new M.L.K. circle. I think the circle itself is good and the traffic calming measures that are in place leading up to the circle are

good. I'm just concerned about three lanes of traffic joining in with the Colvin Street on ramp suddenly narrowing down to two lanes, going much slower. I know the posted traffic speed would be lower than 81, but my concern is people are still going to speed and treat it as if it's a sixty-five mile-an-hour highway.

- R 6-86: As discussed in **Section 3.4.3** and depicted in sheets GP-CG-H5-30-35 and GP-CG-H10-01-04 of the plans in **Appendix A-1, Part 2**, additional traffic calming measures have been incorporated into the design of the Community Grid Alternative. These include a reduced number of lanes, narrowed shoulders, etc.
- C 6-87: Pertaining to the traffic circle at Martin Luther King Junior School for the business 81 northbound traffic should be reduced in speed by physical amendments to the highway that would require drivers to reduce speeds prior to their approach to the traffic circle. I do not believe that posting signs reducing speeds or using flashing lights will be enough to reduce traffic speed unless drivers are required to by the highway meandering or yeah, I would just leave it at meandering. There's obviously a technical term to all this. Even if it were half a roundabout prior to the traffic circle, something that would require the drivers to realize that they have to physically slow down in order to control their vehicle properly. This would not only reduce traffic speed at the roundabout, entering the roundabout, but would eliminate the loud noise created by tractor trailers downshifting to reduce speed. If this change to the road pattern were put in place far enough away from the roundabout, excess truck noise would be reduced and overall speed of traffic would be reduced.
- R 6-87: As the highway approaches the city, posted speeds will decrease gradually, reaching 30 mph prior to MLK, Jr. East. In addition, the highway will be designed with traffic calming measures, such as S-curves and other physical features, to slow down motorists. Once BL 81 enters the city, other traffic calming measures, such as the roundabout at Van Buren Street, traffic signals, on-street parking, bicycle facilities and pedestrian crosswalks, landscaping, and other features would further encourage motorists to drive at the speed limit. Refer to the traffic calming section of **Section 3.4.3** of this FDR/FEIS for more information on measures to be implemented from Colvin Street to MLK, Jr. East.
- C 6-88: In regard to your travel time chart from Fairmount to Lafayette I would be interested in the route taken that was not mentioned. Was that 690 to West Street and then a mixed variety of streets over to the Grid, or via Onondaga Hill, the Southside and Nedrow? If forced I would choose the later, but in the winter I always have chosen 81 and 690 rather than going up the hill by Community Hospital on my return trips. As a 30-year employee of the Syracuse Housing Authority (now retired), I'm very familiar with the convenience of I-81 getting to work in a direct manner.
- R 6-88: BL 81 would provide increased connectivity in downtown due to the number of intersections with cross streets, thereby providing travelers with more route options. The travel time charts predict the anticipated fastest route between Fairmount and Lafayette. Depending on the specific trip origin and destination, the route of choice may differ.

C 6-89: I believe that the decision has already been made by virtue-signaling politicians who currently manage Department of Transportation decisions. I live in Liverpool and do not accept the travel time analyses used to support the community grid decision. Table 8-2 lists travel times for four alternatives from Liverpool to different locations and those results are not credible. There are changes between travel times from Liverpool to Cicero and Baldwinsville using the existing configuration relative to the no build, viaduct and community grid options. There is no rational way that those configurations could affect travel between those locations all miles north of the project.

Of most interest to me is the travel time to Lafayette because whenever I head to points south I currently go through the city on the viaduct. From the existing configuration the travel times claimed are one minute faster with the no build option, four minutes faster with the viaduct option and only one minute slower with the community grid. The claim of a one-minute difference with the community grid is an insulting response. That is simply not a credible result. As a result, I do not trust any of the estimates.

R 6-89: Travel times presented in **Table 8-2** compare current conditions as well as future conditions. Small changes in travel times between Liverpool and Cicero, as well as Liverpool and Baldwinsville, are attributable to minor changes in background traffic due to growth, as well as the construction of other transportation improvement projects apart from the Project that are planned to be in place (and therefore analyzed) only in the future setting. The Project alternatives do not cause changes in travel times between these origins and destinations and this can be verified by the identical travel times for the Community Grid, Viaduct and No Build Alternatives. Under the Community Grid Alternative, trips from Liverpool to LaFayette in the AM peak hour would experience a lower average speed compared to the existing condition on the segment of the trip that takes place south of I-690 as a consequence of additional travel taking place on lower speed non-freeway roadways. Travel time increases on this leg of the journey alone are actually closer to 5 minutes on average. The portion of the trip that occurs north of I-690 would experience higher average speeds than the existing conditions under the Community Grid as a result of substantial improvements on the segment of BL 81 north of I-690 that eliminate recurring congestion on southbound I-81 during the AM peak hour, and this accounts for an overall smaller net change of 1 minute.

C 6-90: My question would be, how am I getting to Tully, New York? Am I taking 690 East to 481, to get back on 81 South? No, I'm not. So, I will take surface roads through Onondaga Hill and then to Lafayette and Tully. What about those towns? Do those towns know that people are going to be zig-zagging through? More traffic, more congestion, more maintenance, bad air quality.

R 6-90: While traveling on I-81 through the city would not be an option under the Community Grid Alternative, motorists would nonetheless have several options for travel to Tully. Potential routes, depending on where the motorist is destined, include an all-interstate route (I-81 to I-690), a combination route (I-81 to BL 81 to I-690), and a non-freeway route such as Route 173.

- C 6-91: As an automobile driver from the western suburbs, I am concerned about congestion in the design of the 690 E exit to W. Genesee St. and West St. That entire interchange is likely to be backed up during rush hours. Also, the current road has a difficult weave with people entering 690 EB at Geddes St. and crossing with those exiting for W. Genesee & West St. How will that be mitigated in the new design?
- R 6-91: As shown in **Figures 5-34** and **5-35**, the new, improved West Street/West Genesee Street intersection would operate acceptably in 2056 AM (at LOS C) and PM (LOS D) periods. The weave area would operate at LOS C in the AM and LOS B in the PM in 2056. The new design would carry three through lanes, plus ramp lanes, in that area, thereby reducing the number of lane changes and providing more gaps for merging and diverging traffic.
- C 6-92: I'm looking at the on-ramp to 690 westbound, from Almond Street, and there's what looks like it's going to be a large cross merge of people going from 690 westbound to 81 northbound, will have to cross merge with the oncoming traffic. This reminds me greatly of the interchange in Rochester that was recently redone between the 490 westbound traffic, and the 390 northbound traffic. That was one of the highest accident-rate interchanges in Rochester, and recently we did that. And this reminds me greatly of that, and I'm concerned about the accident rate that would occur there.
- R 6-92: Under the Community Grid Alternative, there is no connection between Almond Street and westbound I-690. However, westbound access would be provided from Irving Avenue and there is adequate space between Irving Avenue and the westbound and northbound ramps for traffic to merge safely.
- C 6-93: Provide more details on traffic conditions and traffic calming on local streets during construction, including if traffic lights will be synchronized, if vehicles will be able to access major arterials from side streets, and if accidents will increase.
- R 6-93: The construction phasing plan has been developed to maintain traffic on the I-81/BL 81 route during construction and to not require traffic to be detoured onto parallel streets such as State and Salina Streets. Additionally, during construction, NYSDOT will work with the city to mitigate unforeseen impacts that may result from changes in traffic patterns as a result of driver avoidance of construction zones.
- C 6-94: Do the traffic models include potential increases from the Amazon distribution center in Clay as well as other economic projects such as expanded railyard in East Syracuse?
- R 6-94: The Amazon distribution center is not in the model; the Inland Port, which is referred to as "expanded rail yard" in the comment, is included in the model. NYSDOT has reviewed the traffic study reports associated with these developments. Peak traffic generation hours for these developments do not coincide with the peak traffic hours analyzed for the Project (i.e., most traffic generated by these developments would occur when background traffic volumes are lower than those analyzed for the Project). In addition, NYSDOT's analyses included

projected traffic volume growth for 30 years after the Project is built. The I-81 traffic analyses for 2056 (ETC+30, see **Chapter 5** and **Appendix C-3** of the DDR/DEIS and FDR/FEIS) indicate that there would be enough excess capacity such that these developments would not be a concern with respect to the Project's design.

- C 6-95: The traffic model fails to account for recent developments, like the creation of the Amazon distribution center.
- R 6-95: Independent traffic studies were conducted by the developers for the proposed warehouse at 6384 Kirkville Road and the proposed distribution facility in the Town of Clay to evaluate the traffic impacts of the Amazon Distribution Center on the associated roadway networks. These studies recommended local street improvements that would be necessary as mitigation measures for each project. NYSDOT reviewed these analyses in order to evaluate potential impacts to the broader state highway system and the design of the alternatives. The review concluded that since the temporal distribution of trips to and from these facilities would be spread throughout the 24 hours of the day, the additional traffic load during peak hours would not be significant and the proposed design would have sufficient extra capacity to handle the traffic load during peak hours.
- C 6-96: Colvin St. is about as poor a spot as any for an exit. It is entirely residential. It is currently overcrowded with traffic r/t SU activities, current housing, historic cemetery, elementary school, age of the area roadway system which is entirely inadequate. The idea that Colvin and Salina Streets is a socially adequate area for an exit, that it would meet any standards for social justice, proposed environmental degradation of current 481 entrance off Brighton, which is a wetland.
- R 6-96: The new northbound exit to Colvin Street would adequately accommodate traffic in the area and would not result in environmental degradation.
- C 6-97: In addition, the extra ramp proposed for E. Colvin St. does not seem like a good idea. The one on-ramp there now causes awful congestion at times. I can't imagine what that would be like to add an off ramp.
- R 6-97: Existing Colvin Street operates at Level of Service A in 2056 (refer to **Figures 5-33** and **5-35** in the DDR/DEIS and FDR/FEIS) and would be able to accommodate average peak hour traffic.
- C 6-98: I am very concerned how the new traffic patterns will affect residential streets in the University area, especially Outer Comstock. Traffic during the construction and the resulting new traffic pattern must not be rerouted through the residential streets in the university area. We already get dome traffic which is causing terrible pollution to the local residents and greatly disturbing any quality of life in the area.

- R 6-98: Traffic volumes are not projected to increase in residential streets within the Outer Comstock neighborhood. Traffic making the connection from existing I-481 to northbound BL 81 would predominantly take the shortest path, which would entail exiting at Exit 1, turning right on East Brighton Avenue, traveling on Brighton Avenue for a short distance, then making a left turn onto East Glen Avenue to access the northbound entrance ramp at the newly constructed interchange at Glen Avenue. Commuters to University Hill from the south would use the new exit ramp at Colvin Street. This ramp would provide a faster, more convenient connection than exists today that avoids the use of residential streets adjacent to Colvin Street. Traffic volumes are not projected to change substantially through residential areas of Outer Comstock. Traffic patterns on East Colvin Street would change as a result of the Project but would not increase east of BL 81. The new exit ramp from northbound BL 81 would add between 52 and 80 additional vehicles per hour heading eastbound on East Colvin Street during PM and AM peak periods respectively, most of which would be destined to activity centers on the Syracuse University campuses via Comstock Avenue. The removal of the viaduct would reduce the amount of traffic using the Colvin Street entrance to northbound BL 81.

7 SOCIAL, ECONOMIC, AND ENVIRONMENTAL CONSIDERATIONS

7-1 GENERAL

- C 7-1: There must be detailed studies of the impacts of the Community Grid Alternative.
- R 7-1: The DDR/DEIS and FDR/FEIS include detailed assessments of the effects of the Community Grid Alternative. Refer to **Chapter 5, Transportation and Engineering Considerations**, **Chapter 6, Social, Economic, and Environmental Considerations**, and **Chapter 8, Summary of Alternatives** for a description of these effects.
- C 7-2: Converting I-481 to I-81 will result in social, economic, and environmental impacts along the existing I-481.
- R 7-2: The DDR/DEIS and FDR/FEIS evaluate the potential social, economic, and environmental effects along the I-481 corridor. These include a detailed assessment of social conditions, emergency services, noise, and natural resources. Refer to **Sections 6-4-1.4.1, 6-4-6.4.1, Section 6-4-7.4.1**, and **Section 6-4-8.4.1** for more details.
- C 7-3: There is no EIS for all the proposed changes in and impacts on the Town of DeWitt. There have been no meetings in DeWitt, and you have plans that will severely impact DeWitt.
- R 7-3: The DDR/DEIS and FDR/FEIS include portions of DeWitt that border I-481 in the Project Area. The DDR/DEIS and FDR/FEIS examine the potential social, economic, and environmental effects of the Project Alternatives within these areas. NYSDOT has hosted meetings in DeWitt, as well as near DeWitt, and the Town of DeWitt is a Participating Agency in the NEPA process for the I-81 Viaduct Project.
- C 7-4: Several members of the public submitted a flyer that included multiple comments as follows:
- Give us clean air, lead-free and less traffic.
 - Do not build a skybridge and do not return the land.
 - Give us jobs and a community land trust.
 - Move the roundabout away from Dr. King Elementary School.
 - Protect the community during construction
- R 7-4: The DDR/DEIS and FDR/FEIS provide a detailed assessment of air quality and lead. As described in **Sections 6-4-4.3 and 6-4-4.4** of the DDR/DEIS and FDR/FEIS, the Viaduct and Community Grid Alternatives would not result in exceedances of National Ambient Air Quality Standards or other adverse effects on air quality. **Section 6-4-9** describes the potential for some lead-based paint in structures that would be demolished as part of the Viaduct and the Community Grid Alternatives. NYSDOT has standard specifications that its Contractor must

follow for the safe abatement of lead paint (see **Section 6-4-9.3.5 and 6-4-9.4.5** of the DDR/DEIS and FDR/FEIS).

As described in the response to **Comment 5-10**, NYSDOT will not advance a potential skyway alternative.

As described in responses to **Comments 7-133 and 7-9**, NYSDOT is committed to a local hiring program for construction jobs and a process to involve stakeholders in the potential development of surplus right-of-way.

As described in response to **Comment 4-55**, NYSDOT is no longer proposing a roundabout at MLK, Jr. East. Instead, the Community Grid Alternative has been refined to include a roundabout at Van Buren Street, which is farther from Dr. King Elementary School.

NYSDOT is committed to protecting the community during construction, and the DDR/DEIS and FDR/FEIS identify several measures to avoid, minimize, and mitigate potential construction impacts (refer to **Table 4-7** of the DDR/DEIS and FDR/FEIS.)

C 7-5: Use the most up to date Census data. It will show that the City of Syracuse has grown.

R 7-5: The DDR/DEIS and FDR/FEIS incorporate the most recent detailed Census data available at the time of their publication.

C 7-6: A health impact assessment (HIA) should be conducted for the Project, including phases before, during, and after construction. An HIA would help to determine the specific health impacts of the construction project on the community.

An independent and confidential environmental health registry or other method of tracking future health impacts could help to assure the health of the community by identifying and treating these impacts early, so long as the community is involved in its inception and implementation.

R 7-6: **Sections 6-4-4, 6-4-6, 6-4-9, and 6-4-10** of the DDR/DEIS and FDR/FEIS present the assessment of potential effects related to air quality, noise, lead and asbestos, and contaminated materials, respectively, resulting from implementation of the Project. **Section 6-2-3** of the DDR/DEIS and FDR/FEIS presents the assessment of the potential for disproportionately high and adverse effects to environmental justice populations resulting from the Project, including effects from changes in air quality, noise, and exposure to asbestos, lead, and contaminated materials during construction and once the Project is operational.

As documented in the DDR/DEIS and FDR/FEIS, a particulate matter (PM) microscale analysis was conducted for the Project using NYSDOT, FHWA, and U.S. Environmental Protection Agency (USEPA) procedures and was performed using the USEPA emissions model MOVES2014a and dispersion model CAL3QHCR. Three and four sites were selected for the particulate matter microscale analysis for the Viaduct and Community Grid Alternatives, respectively, and multiple receptors were modeled at each of the selected sites. Sites were selected for analysis based on projected traffic conditions, the introduction of new/modified

roadways, and the proximity to sensitive receptors. The sites are located within environmental justice communities. Both particulate matter less than or equal to 2.5 micrometers (PM_{2.5}) and PM less than or equal to 10 micrometers (PM₁₀) were modeled. At the analysis locations, PM_{2.5} and PM₁₀ concentrations would be below the National Ambient Air Quality Standards (NAAQS), which were established by the Clean Air Act to protect human health and welfare, including the health of sensitive populations, such as asthmatics, children, and the elderly.

An air quality analysis for construction activity was also conducted. The MLK, Jr. East area, which is within an environmental justice community, was selected as a representative location for the analysis. Both emissions from on-site construction equipment and emissions from construction-related traffic diversions were included in the analysis. While construction activities would temporarily generate emissions from equipment and fugitive dust from ground disturbance, the maximum predicted PM_{2.5} and PM₁₀ concentrations would be lower than the applicable NAAQS. Adverse effects related to air quality are not anticipated as a result of the Project. A health analysis is not required or warranted.

See responses to **Comment 7-129** with respect to measures to mitigate construction effects.

- C 7-7: NYSDOT should coordinate with the New York State Department of Health to study and mitigate the health effects of the project.
- R 7-7: As stated in the response to **Comment 7-6**, a health impact study was not prepared for the I-81 Viaduct Project. The New York State Department of Health was notified of the publication of the DDR/DEIS and did not provide any comments or other correspondence on the project.

7-2 NEIGHBORHOOD CHARACTER

- C 7-8: The DDR/DEIS does not describe how the Community Grid Alternative will impact Dr. King Elementary School. Traffic must slow to 20 mph at the school.
- R 7-8: Dr. King Elementary School is within the Project Area studied in detail in the DDR/DEIS and FDR/FEIS. The traffic analysis includes nearby intersections (refer to **Chapter 5** of the DDR/DEIS and FDR/FEIS), and there is air quality and noise analysis prepared for the school and locations near the school. Refer to **Sections 6-4-4.4** and **6-4-6.4** of the DDR/DEIS and FDR/FEIS. As described in **Section 3.4.3**, traffic calming measures would be implemented along BL 81 from north of Colvin Street to south of MLK, Jr. East to encourage motorists to decrease speed. The speed limit at MLK, Jr. East would be 30 mph.
- C 7-9: NYSDOT must allow for the re-use of as much surplus right-of-way as possible and identify a process for its re-use. Establish a community-oriented commission to manage a land trust for all property to be returned to the city for strategic development for the community. This commission would be funded to provide loans to homeowners and qualified landlords for rehabilitation of existing home in the targeted special district. NYSDOT must involve the local community and the City of Syracuse in this process. The land use working group should be convened immediately following publication of the FDR/FEIS. All stakeholders should be

involved within the context of a collaborative planning body under local control to ensure that broad public interests are served. Such a planning body would utilize urban design principles, carry on its business in a transparent manner and pursue processes and structures of community decision-making.

- R 7-9: The DDR/DEIS and FDR/FEIS identify the potential parcels that could result from surplus transportation right-of-way (see **Sections 6-3-2.4.3** and **6-3-2.4.4**, and associated figures).

Upon the completion of construction, NYSDOT would dispose of potential surplus transportation right-of-way in the Central Study Area in accordance with Federal and State law, or the Contractor could sell staging sites. In total, implementation of the Community Grid Alternative could result in approximately 10 to 12.5 acres of surplus transportation right-of-way, depending on how much land would be needed to accommodate the highway, sidewalk, shared use (bicycle and pedestrian) path, and other transportation features (see **Figure 6-2-1-12**). NYSDOT would determine the size and location of the parcels once construction is complete. The potential surplus transportation right-of-way would consist of several sites near Almond Street and Erie Boulevard where the I-81 and I-690 ramps would be removed; a parcel north of Erie Boulevard between McBride and Catherine Streets where the eastbound I-690 ramp from McBride Street would be removed; a parcel north of Butternut Street between BL 81 and State Street where the existing northbound I-81 entrance ramp from Butternut Street would be removed; a parcel south of Court Street between BL 81 and Sunset Avenue where the existing northbound I-81 ramp to Sunset Avenue would be removed and relocated to Bear Street; and two parcels near MLK, Jr. East where the alignment of BL 81 shifts eastward. The parcels on Almond Street would range from approximately 0.75 to 1.5 acres; those on Erie Boulevard would range from 0.3 to 0.5 acres; the parcel north of Butternut Street would be 1 to 1.5 acres; the parcel south of Court Street would be 0.75 to 1 acre; and the parcels near MLK, Jr. East would be 3 to 3.5 acres (north of MLK, Jr. East) and 1 to 1.3 acres (south of MLK, Jr. East and east of Leon Street). In addition, the Community Grid Alternative would result in a total of approximately 2 to 2.5 acres consisting of numerous land strips that could be too small for development but may be of use to adjacent property owners, and there could be additional surplus right-of-way where MLK, Jr. East would be removed between the rear driveway of Dr. King Elementary School and BL 81. NYSDOT would identify the specific boundaries of the surplus parcels and their acreages during final design, and NYSDOT's Property Evaluation Review Group would determine the next steps to dispose of the right-of-way once it concludes that the land is no longer needed for transportation purposes.

NYSDOT would form a land use working group consisting of representatives from the city, the City's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel. Further details about the formation of and participation in this working group would be presented during continued Project public involvement activities. Final design must begin before the formation

of this group, however, NYSDOT would form the group prior to the start of the construction phases.

Any new use or development would be subject to the City of Syracuse's zoning ordinance and its Land Use and Development Plan 2040 currently being updated through its "Rezone Syracuse" project. Through the Rezone Syracuse process, the City has and continues to solicit community input.

- C 7-10: The Project does nothing to reconnect the Eastside and Southside neighborhoods.
- R 7-10: The Community Grid Alternative would remove the I-81 viaduct between the New York, Susquehanna and Western Railway bridge near Renwick Avenue and I-690 and improve both north-south and east-west connectivity (refer to **Section 3.4.3** of the DDR/DEIS and FDR/FEIS). Almond Street would be reconstructed with signalized vehicular, pedestrian, and bicycle crossings at most east-west streets. There will be more opportunity to cross between Southside and University Hill and Eastside than under current conditions.
- C 7-11: On page 6-145, the DDR/DEIS reads, "...the Viaduct Alternative would not result in adverse cumulative effects on neighborhood cohesion" or any "adverse indirect effects on land use." The Viaduct Alternative would have profound adverse impacts on neighborhood cohesion with its removal of many buildings and further physical and economic breakdown of the community along and adjacent to its path. The DDR/DEIS does not address the cumulative effects of the original elevated highway, which would help to understand effects of the wider and taller Viaduct Alternative.
- R 7-11: **Chapter 6** of the DDR/DEIS and FDR/FEIS consider the existing viaduct as part of the affected environment and describes the effects of its continued use under the No Build Alternative. It also describes the permanent effects of the Viaduct Alternative, including the features that would make it different than the current viaduct. Therefore, the DDR/DEIS and FDR/FEIS reasonably consider the effects of the wider and taller viaduct proposed under the Viaduct Alternative.
- C 7-12: The DDR/DEIS does not describe how the Community Grid Alternative will reconnect neighborhoods and the return on the substantial investment to build it.
- R 7-12: **Section 6-2-2.4.1** describes how the Community Grid Alternative would remove barriers between neighborhoods to reconnect them. Many sections of Chapter 6 identify benefits of the Community Grid Alternative, which are summarized in **Section 8.3** of the DDR/DEIS and FDR/FEIS.
- C 7-13: There should be a collaboration between the I-81 project and Blueprint 15.
- R 7-13: NYSDOT will coordinate with Blueprint 15 during the design and construction of the I-81 Viaduct Project.

- C 7-14: This is a community revitalization project, and therefore, it must include improvements to properties at 750 East Water Street, 1004 East Water Street, and Ormand Park, which appear to be owned by Upstate Development, Inc.
- R 7-14: Improvements outside the current and proposed transportation right-of-way are outside the scope of the I-81 Viaduct Project.
- C 7-15: The future use of surplus property must be determined by a Land Trust Group. It must include at least 3 members of each community to get broad community input.
- R 7-15: As stated in the response to **Comment 7-9**, NYSDOT is committed to forming a land use stakeholder working group. While the membership of the working group will be determined at a later date, NYSDOT will consider the proposal offered by this commenter.
- C 7-16: The city should eliminate minimum parking requirements from the building code and replace property taxes with Land Value Taxes to encourage more development. Do not tear down the highway just to have space go back to parking.
- R 7-16: The proposal is outside the scope of the I-81 Viaduct Project. Refer to the response to **Comment 7-9** regarding the process to develop surplus right-of-way.
- C 7-17: Provide us with a building that we can use as a cultural center.
- R 7-17: This proposal is outside the scope of the I-81 Viaduct Project.
- C 7-18: Consider the quality-of-life impacts of the Community Grid Alternative to communities outside of the city.
- R 7-18: The DDR/DEIS and FDR/FEIS did not identify any adverse direct or indirect effects from the Community Grid Alternative on social or economic conditions in the South, East, or North I-481 Study Areas. In response to comments received following publication of the preliminary DDR/DEIS in April 2019, NYSDOT prepared a more detailed, supplemental analysis of the effects of changes in travel patterns and travel times on business operations under the Community Grid Alternative (see **Appendix D-2**). The analysis considers the potential benefits and effects of both build alternatives on the local and regional economies (see Section **6-3-2**).
- The DDR/DEIS and FDR/FEIS also did not identify any adverse effects on air quality in these study areas (see **Section 6-4-4** and **Appendix G**). The analysis did identify adverse effects from highway noise, and as a result noise abatement was considered where noise impacts are predicted to occur. Noise barriers that meet FHWA and NYSDOT noise policy feasibility and reasonableness criteria are recommended at locations in the I-481 South, East, and North Study Areas (see Section 6-46 and Appendix H).
- C 7-19: The Community Grid Alternative includes noise walls, which will divide the city.

- R 7-19: Noise abatement was developed consistent with NYSDOT's Noise Policy, which includes a process for public engagement. Noise barriers are not proposed along surface streets. In the locations where noise walls are proposed, there has been community outreach and community support for installing these noise barriers (see **Section 6-4-6.4.5** of the DDR/DEIS and FDR/FEIS for more information about noise abatement measures and public outreach on the proposed noise barriers).

7-3 SOCIAL GROUPS BENEFITED OR HARMED

- C 7-20: The removal of highway overpasses along Almond Street and West Street will displace homeless people who take refuge beneath them. These are vulnerable populations that are not well served and must be addressed.
- R 7-20: As discussed in **Section 6-2-3** of this FDR/FEIS, unhoused/homeless populations were considered when identifying the low-income (environmental justice) communities within the Environmental Justice Study Area. However, no known unique and discrete populations (e.g., homeless encampments) were identified in the Study Area.

7-4 ENVIRONMENTAL JUSTICE

- C 7-21: NYSDOT must implement a plan to protect local populations from any gentrification that may occur because of the Community Grid Alternative. Many fear that the expected redevelopment will have negative consequences for years to come. In addition, community members want more Black-owned businesses in their neighborhood.
- R 7-21: **Section 6-3-2.4** of the DDR/DEIS and FDR/FEIS describes the potential direct, indirect, and cumulative effects of the Community Grid Alternative on economic conditions in the Central Study Area. As stated in **Section 6-3-2.4.1**, much of the housing near the viaduct is publicly owned and/or subsidized property with rent protection for its occupants, and the Community Grid Alternative would not displace any residents through property acquisition. The DDR/DEIS and FDR/FEIS also disclose the specific business displacements resulting from the Community Grid Alternative and the process NYSDOT would follow to inform occupants and assist in their relocation. Furthermore, the DDR/DEIS and FDR/FEIS describe the potential surplus transportation right-of-way that could become available for development or other use under the Community Grid Alternative once transportation infrastructure is removed (refer to **Section 6-2-1.4.3**). The dispersion and limited size of these sites, as well as the predominance of publicly owned lands and land held by large institutions, would limit potential indirect displacement due to rising rents or increased property values.
- C 7-22: NYSDOT must coordinate with Syracuse Housing Authority to identify voluntary options to mitigate risks for the Authority's residents.
- R 7-22: The DDR/DEIS and FDR/FEIS identify the potential adverse effects of the Project during its construction and once operational. Where adverse effects are identified, FHWA and NYSDOT have described mitigation measures. Any mitigation associated with the Preferred Alternative

will be incorporated into the Record of Decision. NYSDOT will coordinate with Syracuse Housing Authority to implement any mitigation measures affecting its residents.

C 7-23: Establish a fund for community development, beautification, education, training, and other benefits needed and overdue to the community.

R 7-23: As part of the Project, New York State is participating in a 'Workforce Forward: Syracuse' initiative. This is a \$1M initiative to promote local workforce participation, through which the State Labor Department is hosting job fairs and conducting outreach to communities with highest need. In addition, NYSDOT's local hiring preference application to FHWA was approved in March 2022, which will enable local hiring language to be included as part the contract documents.

As part of actual construction, NYSDOT will provide landscape enhancements where appropriate. Aesthetic and gateway treatments have been and will continue to be an important consideration as the Project's design progresses and are discussed in **Sections 5.5.4 and 5.6.4** of the DDR/DEIS and FDR/FEIS. NYSDOT is committed to context-sensitive solutions, and the Project designs, including the urban design, have considered the community's character. NYSDOT continues to work its Urban Design Technical Advisory Panel (see **Chapter 9** of the DDR/DEIS and FDR/FEIS) on potential gateway designs and treatments to enhance the aesthetics of the highway, and coordination with the City of Syracuse will continue to take place through final design.

To address the workforce and employment needs of the I-81 Viaduct Project, NYSDOT, through its WorkSmart NY program, will coordinate with existing community action agencies and initiatives such as CenterState CEO; Syracuse Build, led by the City of Syracuse; educational institutions such as Syracuse Educational Opportunity Center (EOC), an affiliate of SUNY Morrisville Community College; trade and industry representatives; and other key partners to create the WorkSmartNY Syracuse Build Collaborative (the Collaborative) for the FHWA Highway Construction Worker Partnership (HCWP) grant. The region's workforce development board, CNY Works, Inc., has participated in the planning and organization of this grant and a statement of commitment has been requested.

FHWA's HCWP grant provides funding to states to expand workforce development opportunities in local communities and increase the number of construction workers in the highway construction field through recruitment, assistance, training and placement. The Collaborative understands that a successful program requires more than teaching an individual trade skills; it must ensure that programs and services exist to support them throughout their trainee/apprenticeship duration. The Collaborative has a long and successful track record of working with other agencies in underserved communities to secure funding for construction skills training, recruitment, and placement, and spearheading workforce development advocacy efforts. NYSDOT will leverage those skills, expertise, and resources to bring the partnership full circle by engaging local labor unions and industry representatives to provide actual employment opportunities to trained individuals.

NYSDOT has applied for additional HWCP grant funds to expand the WorkSmart NY program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program would grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship, a program to help get more people involved in local trades unions.

Aesthetic and gateway treatments have been and will continue to be an important consideration as the Project's design progresses and are discussed in **Sections 5.5.4 and 5.6.4** of the DDR/DEIS and FDR/FEIS.

NYSDOT is committed to context-sensitive solutions, and the Project designs, including the urban design, have considered the community's character.

NYSDOT continues to work its Urban Design Technical Advisory Panel (see **Chapter 9** of the DDR/DEIS and FDR/FEIS) on potential gateway designs and treatments to enhance the aesthetics of the highway, and coordination with the City of Syracuse will continue to take place through final design.

- C 7-24: The DEIS should remove the section about environmental justice.
- R 7-24: **Section 6-3-3** of the DDR/DEIS and FDR/FEIS is required by Executive Order 12898, USDOT Order 5610.2(a), and FHWA Order 6640.23A. It cannot be removed.
- C 7-25: Executive Order 12898 was likely enacted to avoid the problems we are seeing proposed for the I-81 viaduct. Section 6-7 of the proposal for the project states, "Many of these [negative] effects would occur in identified environmental justice communities. NYSDOT proposes mitigation measures to minimize these effects on the public, including environmental justice communities; however, it is not feasible to fully avoid the effects of the Community Grid Alternative in environmental justice communities." I do not agree that "it is not feasible to fully avoid the effects of the Community Grid Alternative in environmental justice communities." It is feasible. We must find a way to protect those that will be put at further risk if this project were to go forward and go back to the drawing board to find other alternatives to the community grid.
- R 7-25: NYSDOT considered social, economic, and environmental effects as the developed and refined alternatives for the I-81 Viaduct Project. NYSDOT considered multiple types of highway and roadway alternatives, including viaducts, tunnels, and at grade options. Furthermore, NYSDOT considered multiple iterations of the Community Grid Alternative to avoid or minimize effects on the built and natural environment. As discussed in the analysis presented in **Chapter 6** of the DDR/DEIS and FDR/FEIS, none of the alternatives considered could fully avoid adverse effects, including effects in environmental justice communities. Therefore, NYSDOT considered measures to mitigate the adverse effects of the Community Grid Alternative.
- C 7-26: This project must address the issues of concentrated poverty in Syracuse. Everybody deserves safe neighborhoods. The jobs, education, and training potentially provided by this

project are key tickets out of poverty. Poverty was never supposed to be permanent, and it was never supposed to be defined by color.

R 7-26: Comment noted. Also see response to **Comment 7-23**.

C 7-27: NYSDOT must prioritize the restoration of the historically destroyed neighborhood with reparations, guaranteed housing, financial support, and jobs support. The city needs to own up to the destruction the initial construction caused and take concrete steps to invest in the neighborhood for its existing residents and not speculators or opportunistic gentrifiers.

R 7-27: The Community Grid Alternative would not displace residents and the dispersion and limited size of land that would be disposed, as well as the predominance of publicly owned lands and land held by large institutions, would limit potential indirect displacement due to rising rents or increased property values (see response to **Comment 7-21**). NYSDOT is also taking measures to provide jobs during construction of the Project to local residents (see response to **Comment 7-133**).

C 7-28: Social justice requires the chronically disabled, disadvantaged persons to be made a priority with this huge infrastructure project.

R 7-28: Comment noted. To address the workforce and employment needs of the I-81 Viaduct Project, NYSDOT, through its WorkSmart NY program, will coordinate with existing community action agencies and initiatives such as CenterState CEO; Syracuse Build, led by the City of Syracuse; educational institutions such as Syracuse Educational Opportunity Center (EOC), an affiliate of SUNY Morrisville Community College; trade and industry representatives; and other key partners to create the WorkSmartNY Syracuse Build Collaborative (the Collaborative) for the FHWA Highway Construction Worker Partnership (HCWP) grant. The region's workforce development board, CNY Works, Inc., has participated in the planning and organization of this grant and a statement of commitment has been requested.

FHWA's HCWP grant provides funding to states to expand workforce development opportunities in local communities and increase the number of construction workers in the highway construction field through recruitment, assistance, training and placement. The Collaborative understands that a successful program requires more than teaching an individual trade skills; it must ensure that programs and services exist to support them throughout their trainee/apprenticeship duration. The Collaborative has a long and successful track record of working with other agencies in underserved communities to secure funding for construction skills training, recruitment, and placement, and spearheading workforce development advocacy efforts. NYSDOT will leverage those skills, expertise, and resources to bring the partnership full circle by engaging local labor unions and industry representatives to provide actual employment opportunities to trained individuals.

NYSDOT will establish Disadvantaged Business Enterprises goals on the Project contracts and adhere to Equal Employment Opportunity (EEO) program requirements. Please see response to **Comment 7-133** regarding local hiring initiatives.

In addition, local street improvements would include pedestrian and bicycle safety and connectivity enhancements, with streets designed to meet Public Rights-of-Way Accessibility Guidelines (PROWAG) and other applicable accessibility and safety requirements.

- C 7-29: Because the area most affected by the demolition and construction projects is an environmental justice community, the area deserves scrutiny and special protections for the community's health as well as consequences for miscreant contractors.
- R 7-29: The potential for disproportionately high and adverse effects to environmental justice populations were assessed, as documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS. Mitigation measures and contractor protocols, including those related to environmental justice populations, are described in **Table 4-7** of the DDR/DEIS and FDR/FEIS.
- C 7-30: Coordinate with agencies such as the Department of Health and Human Services for remediation strategies for the Project.
- R 7-30: The DDR/DEIS identified the potential adverse effects of the Viaduct and Community Grid Alternatives and identified measures to mitigate those effects. The New York State Department of Health and Human Services was notified of the publication of the DDR/DEIS. NYSDOT did not receive comments from the New York State Department of Health and Human Services on the DDR/DEIS.
- C 7-31: Include a statue or memorial dedicated to the people and history of the 15th ward where I-81 was built on top of a community that could not fight to save their neighborhood because of their skin color and economic status.
- R 7-31: These impacts were a result of a previous project (i.e., the construction of the existing I-81), but because the current I-81 Viaduct Project would not result in an adverse effect on historic resources, historic resources mitigation (such as a monument or interpretive element) is not required as part of the Project.

7-5 LAND ACQUISITION, DISPLACEMENT, AND RELOCATION

- C 7-32: The project should avoid displacing residents, including residents of public housing. If it must displace people, describe the process to relocate them.
- R 7-32: The Viaduct Alternative would involve the displacement of 95 dwelling units. **Section 6-3-1.3.5** of the DDR/DEIS and FDR/FEIS describes the steps that NYSDOT would take to acquire residential property, including communications with property owners and tenants. However, as discussed in **Section 6-3-1.4.1**, the Community Grid Alternative (identified as the Preferred Alternative) would not displace dwelling units. NYSDOT would carry out all property acquisitions in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act and New York State's Eminent Domain Procedure Law, which includes relocation assistance to owners and tenants of affected properties.

- C 7-33: Please confirm if 501 East Washington Street will be acquired to build the project.
- R 7-33: NYSDOT would not acquire 501 East Washington Street to construct the Viaduct or Community Grid Alternative.
- C 7-34: Please identify how the project will impact 521 East Washington Street.
- R 7-34: NYSDOT would acquire all of 521-527 East Washington Street, including the dental office, to construct the Viaduct Alternative. The Community Grid Alternative, which has been identified as the Preferred Alternative in the DDR/DEIS and FDR/FEIS, would not acquire this property.
- C 7-35: Please acquire the property at 547-549 Burnet Avenue. It is a nuisance for the neighborhood.
- R 7-35: Neither the Viaduct nor the Community Grid Alternatives would require acquisition of the property at 547-549 Burnet Avenue.
- C 7-36: Please identify the plans for relocation of the Dunkin' Donuts on Almond Street. According to Project materials, this property is slated to potentially be acquired not for highway reconstruction of I-81; rather it appears to be a site for future public park. It is submitted that any proposed acquisition for this use is unauthorized and illegal under the NYS Highway Law. Moreover, as stated above, since it is not necessary for I-81 reconstruction, the State should modify its proposed design and leave this property alone.
- R 7-36: The Viaduct and Community Grid Alternatives would acquire a property on Almond Street currently occupied by a Dunkin' Donuts (refer to **Sections 6-3-1.3.1** and **6-3-1.4.1** of the DDR/DEIS and FDR/FEIS) for transportation-related improvements, not for the construction of a park.
- C 7-37: Please update figures where Castle Street should be correctly identified as MLK Jr., East.
- R 7-37: The figure is updated in the FDR/FEIS.
- C 7-38: Remove the Pioneer Homes near I-81 and provide replacement housing at another location.
- R 7-38: This proposal is outside the scope of the I-81 Viaduct Project.
- C 7-39: Clarify if the Project will affect properties along East Brighton Avenue or between South State Street and Thurber Avenue.
- R 7-39: No properties will be affected along East Brighton Avenue, State Street, or Thurber Street.
- C 7-40: The Viaduct Alternative requires acquisition of many buildings.
- R 7-40: The Viaduct Alternative would require the full acquisition of 24 buildings (refer to **Section 6-3-1** for more information).

- C 7-41: The DDR/DEIS shows a 0.46-acre acquisition of a Charter Communications parking lot at 815 Erie Boulevard East, resulting in a reduction of 62 parking spaces with the Community Grid Alternative, and more spaces may be lost to accommodate traffic circulation after the Project is completed. This will have a severe impact on the function of Charter Communications. The parking lot is currently over capacity on a busy day, and the loss of parking will affect the marketability of the property. It may also render the property non-conforming with the City of Syracuse code.

Given the permanent impact of the Project on parking for Charter's employees, visitors, and customers, please consider measures to mitigate the loss of parking, including possible modifications to the current design.

- For example, once the project is complete, would Charter be able to utilize the space underneath the off/on ramps for parking or will the ramps be too close to ground level to allow for this?
- If there is clearance for parking under the current design, does the state have an indication if this area will be used for anything else? Approximately how many parking spaces will be available?
- Could the ramp remain elevated for a greater length than currently designed to save more parking?
- Can the ramp be redesigned and built closer to Canal Street, to avoid dividing Charter's current parking lot?
- The building by Canal Street is currently for sale. Would the State consider acquiring that property to place the ramp in that location?

The design should include measures to allow for safe pedestrian crossing of Erie Boulevard, such as a pedestrian bridge, for employees, visitors and customers would park across the street due to permanent loss of parking on Charter's property.

- R 7-41: A critical component of the Community Grid Alternative is the new I-690 interchange at Crouse and Irving Avenues. Construction of the new interchange would require unavoidable impacts to a portion of the existing parking area to the east of the Charter Communications building. Loss of parking, including potential impacts to the overall value of the property, would be included in the appraisal and NYSDOT's subsequent real estate settlement offer. The current design includes new retaining walls to minimize the footprint of the new eastbound off-ramp. Furthermore, the proposed acquisition line has been located close to the retaining wall to minimize the number of parking spaces that would be lost.

The proposed eastbound off-ramp would be too close to ground level as it approaches Erie Boulevard and would not allow for parking below it. Additionally, the elevation of the ramp cannot be changed enough to alter this condition as the ramp profile needs to meet geometric design standards.

Attempting to shift the interchange and the Irving Street extension to the east would require the acquisition of two additional buildings, including the building for sale and the Dialysis Center, and is therefore not being considered.

NYSDOT could consider pedestrian mitigation measures at this location during final design if warranted by demand and safety considerations.

C 7-42: The DDR/DEIS indicates that there will be no physical acquisition of any portion of the Charter Communications Building. However, from the plans available to the public, it appears that the proposed highway boundary extends into the back side of the existing building. The proposed easement area off I-690 would extend over the roof of Charter's Building. Please clarify the following:

- What is NYSDOT's intention for the proposed highway boundary line at this location? Will the current retaining wall be removed?
- Why is this area included within the easement/for what purpose? Is the intent just the roof area for something overhead or will Charter lose access to the area underneath?

R 7-42: The highway boundary shown to go through a portion of the building is the existing highway boundary, not the proposed highway boundary.

NYSDOT would reconstruct I-690 and construct the new eastbound off-ramp to Irving Avenue within the existing highway boundary and without impacting the existing building. The edge of the new eastbound off-ramp would be in the same location as the edge of the existing on-ramp from McBride Street. A new concrete barrier would be placed at the edge of the ramp shoulder, essentially where the existing guiderail is located. The edge of the proposed highway ramp would not be any closer to the building than it is now, and the existing former station platform adjacent to the building would not be impacted. The portion of the existing retaining wall adjacent to the building would not be modified; however, due to the downgrade of the new eastbound off-ramp to Irving Avenue, the height of the existing retaining wall would need to be lowered beginning approximately 50 feet east of the building. In addition, approximately 175 feet beyond the east end of the building, the existing retaining wall would need to be replaced with a shorter wall that follows the edge of the curving ramp. To clarify the relative elevation of the proposed eastbound off-ramp, near the west end of the Charter Communications building, the new ramp would be very close to the existing highway elevation. At the east end of the Charter Communications building, the new ramp would be approximately 5 feet lower than the existing highway elevation. Approximately 50 feet east of the building, the new ramp would be approximately 9 feet lower than the existing highway elevation, such that the height of the existing retaining wall would need to be lowered approximately 9 feet and the new concrete barrier would be installed on top of the retaining wall. The height of the existing retaining wall would continue to be reduced to the east. Where the curvature of the ramp begins, the new ramp would be approximately 5 feet above ground level and would be only 2 feet above ground level where it passes by the existing transformer.

The temporary easement on the east side of the parking lot was intended to allow reconfiguration of that portion of the parking lot. However, the cost to reconfigure the parking lot would be included in the real estate settlement; therefore, the temporary easement would be modified to only include the area needed to build and maintain the retaining wall adjacent to the new ramp.

- C 7-43: This location includes a very busy Spectrum mobile retail store. Considering customer accessibility and safety, please identify:
- What is NYSDOT's intent for a temporary easement within the parking lot, adjacent to the proposed off-ramp?
 - Will this area be utilized for staging/storage? If so, how long will this space be occupied for these purposes? Would it be possible for the NYSDOT to use the parking lot to the East side of the proposed ramp?
 - Will NYSDOT return the parking lot and entrances to new (original) condition if disturbed?
- R 7-43: Refer to the responses above to regarding need for a temporary easement through the Charter Communications Property. It was not the intent to utilize the area for storage and staging, but as noted, the temporary easement would be modified, thereby eliminating unintended use of this area during construction. In general, areas disturbed by construction would be restored. However, in this case, the restoration would depend on how Charter Communications elects to reconfigure the east end of the parking area. NYSDOT would work with Charter Communications during the real estate settlement process to address this issue.
- C 7-44: It appears that the I-81 project will require relocation of Charter's fiber facilities and possible pole relocations at several locations other than the Erie Boulevard property. What plans are in place to ensure that the relocation of these facilities will not result in an interruption of service to our customers?
- R 7-44: NYSDOT has been meeting with the various utility companies that may be affected by the Project, including a meeting with Charter Communications that was held this past summer. NYSDOT understands how critical it is for utility companies to maintain uninterrupted service. Coordination with utility companies would continue into final design, during which more specific relocation needs and plans would be developed.
- C 7-45: It appears that the space near Canal Street on the east side of the off/on ramps will be inaccessible and our property will essentially be split by the off ramp.
- Can you confirm that our understanding is accurate?
 - If so, splitting the lot will render a portion inaccessible except for Canal Street, which poses safety concerns for employees and customers to cross this area to reach our location.
- R 7-45: The areas owned by Charter Communications on the east side of the new ramps would essentially be split by the proposed ramp. NYSDOT understands that the area east of the ramps would essentially be inaccessible and would take that into account as part of the real estate settlement process.
- C 7-46: Two of the three existing driveways (the two closest to the proposed ramp) will be subject to temporary easements during construction, and it appears that one of those will be permanently lost because of its proximity to the highway ramp. Charter Communications operates a heavily visited retail store at this location which requires employee, visitor and

customer parking by as many as 134 vehicles at a time and must provide for traffic circulation and safe entry into our building. If the two driveways are inaccessible during construction, all traffic will have to enter and exit through the third driveway, making traffic circulation, ingress, and egress difficult and potentially dangerous.

- What are NYSDOT's intentions and needs for these easements? Are the temporary easements for ingress/egress of construction vehicles only or will there be times that equipment, supplies or materials will be staged within the easements, preventing access by employees, visitors and customers?
- Would it be possible to limit this easement to one driveway?

R 7-46: As noted above, the temporary easement adjacent to the new eastbound off-ramp would be reduced to only what is needed to build and maintain the new eastbound off-ramp and retaining wall and is not intended to be used for ingress/egress of construction vehicles or for storage of materials and equipment. The temporary easements located at the other two existing driveways, immediately west and east of the building, have been eliminated. The easements were originally intended to only provide for blending the Erie Boulevard paving work into the existing driveway, but it has been determined that this work can be done within the existing highway boundary.

Two of the easements have been eliminated and only the third driveway, approximately 360 feet east of the building, would be permanently closed as a result of the location of the new ramp, and the temporary easement would be reduced to only what is needed to build the Project and maintain the ramp and retaining wall.

C 7-47: The existing transformer and corresponding utility pole providing electricity to our building at 815 Erie Boulevard East and fiber connectivity for our network is in the middle of the proposed off-ramp. The DDR/DEIS is unclear regarding responsibility for relocation of the transformer and utility pole.

- Can NYSDOT confirm that it is working with the electric provider to relocate this transformer and utility pole?
- As this is a NYSDOT project, can NYSDOT confirm that the costs to move any infrastructure currently serving Charter's building would be borne by the state?
- Are plans in place to avoid interruption of service while the transformer and utility pole are relocated?

R 7-47: NYSDOT is working with all the utility companies regarding impacts and relocations that may be necessary. In general, if NYSDOT purchases private property that contains existing utilities that need to be relocated, NYSDOT would be responsible for the relocation costs. Private utilities that reside within public rights of way would not be eligible for reimbursement if relocation is necessary. NYSDOT understands how critical it is for utility companies to maintain uninterrupted service. Coordination with utility companies would continue into final design during which more specific relocation needs and plans would be developed.

- C 7-48: Concerned regarding proposed partial acquisition of C.A.S Industries, Inc. property at 935 Erie Boulevard East. The proposed on and off ramp of 690 at South Crouse Avenue would require taking of client's parking lot. The loss would eliminate customer parking, make the present entrance unusable, and would restrict the business to receive and ship products since that is currently implemented with full size tractor trailers, 53 feet in length. We were advised at the public hearing that a representative of the NYSDOT would visit the site and identify in more detail where construction would occur. Please accept this letter as our objection to the plan as currently drafted.
- R 7-48: NYSDOT Region 3 Real Estate has been in contact with the property owner regarding these concerns.
- C 7-49: DTS Truck Service property is next to the I-81 southbound lane, between Court Street and Catawba Streets. Sidewalks are planned to be installed on both sides of North Clinton Street between Spencer Street and Court Street and from Court Street to Bear Street only on the west side of North Clinton Street. Please do not install sidewalks behind my property on the east side of North Clinton Street from Kirkpatrick Street to Court Street. A sidewalk at this location would interfere with the parking space for my customers' trucks, trailers, and employees.
- R 7-49: NYSDOT Region 3 Real Estate has been in contact with the property owner regarding these concerns.
- C 7-50: Andy's, located at 101 West Court Street (at Genant Drive), has four driveways, one of which is for tractor trailers to unload and is paramount to the business's survival. There is also a utility pole there that makes it difficult for trucks to back in. We ask that NYSDOT visit the property so we can explain what needs to be addressed.
- R 7-50: NYSDOT is coordinating with the property owner. The plans have been modified to include all four driveways, and discussions with the property owner regarding the telephone pole will continue as the Project progresses into final design.
- C 7-51: Please avoid acquiring property to reconstruct the I-81/I-481 north and south interchanges under the Community Grid Alternative.
- R 7-51: The Community Grid Alternative would not require the displacement of any residences. The reconstruction of the I-81/I-481 north and south interchanges would require the partial acquisition of 13.31 acres of land (refer to **Figures 6-3-1-2d** and **6-3-1-2g** and **Table 6-3-1-4** in the DDR/DEIS and FDR/FEIS). NYSDOT will coordinate with landowners following the requirements of the Uniform Relocation Assistance and Real Property Acquisition Act and New York State Eminent Domain Procedures Law.

7-6 LOCAL AND REGIONAL ECONOMIES

- C 7-52: The Community Grid Alternative will adversely impact businesses along the existing I-81 corridor and adjacent towns and villages, including Destiny USA and hotels. The removal of I-81 as a high-speed access into and through downtown Syracuse as proposed under the Community Grid Alternative would destroy businesses both north and south of the City of Syracuse. There will be a loss of customers, and a resultant negative effect on the local economy and tax base. Businesses should have been consulted to address these impacts.
- R 7-52: The DDR/DEIS included an expanded analysis of the indirect economic effects of the Community Grid Alternative based on public comments on the April 2019 preliminary DDR/DEIS (see **Section 6-3-2.4.3** and **Appendix D-2** of this FDR/FEIS where this expanded analysis is provided). The analysis examines the potential to indirectly affect revenues at several notable retail and commercial corridors along I-81 and I-481 within Syracuse, as well as north, south, and east of the city. The analysis concluded that changes in travel times and volumes would not adversely affect businesses at most locations within the study areas.

The analysis presents effects near Interchanges 23 and 25, where there are a super-regional shopping center, a large concentration of hotels, and other businesses that typically attract customers because of their proximity to the highway, in more detail. The Community Grid Alternative would not result in the indirect displacement of one or more of the hotels near Interchanges 23 and 25 for the following reasons:

- The hotels would continue to be strategically located within the market. The hotels would continue to be well positioned to capture east-west trips on I-90 as well as southbound trips on I-81 connecting with I-90. The hotels would be easily accessible from the portion of BL 81 north of Downtown Syracuse. In addition, the hotels would continue to be within close proximity to the airport, Destiny USA, and Downtown Syracuse.
- The hotels' national branding provides marketing capability to remain prominent regionally. Online presence, combined with mobile apps and wayfinding, reduces these hotels' dependence on capturing consumer trips through visual recognition and at-the-moment visitation decisions.
- The projected 1.3 percent decrease in consumer trips represents a very small portion of total bookings. The 14 hotels near the interchanges have higher performance metrics in terms of average occupancy rate and revPAR as compared with the Syracuse market, suggesting that a slight decrease in bookings would not jeopardize their viability.

Travel time changes would not substantially alter consumer behavior and capture rates within Destiny USA's consumer trade areas. There are no comparable retail and entertainment offerings within a closer drive time, and many consumer trips occur outside peak commuting hours so that most regular Destiny USA visitors would see little to no difference in travel time. In addition, regular consumers who do experience incremental travel delay will likely adjust their trip frequency (e.g., shop longer less often) or adjust their trip times to avoid more congested periods. The Project's effects on travel times are not anticipated to lead to increases in online purchasing; most consumers frequenting Destiny USA already have online shopping available to them; they frequent Destiny USA for the unique retail and entertainment

experiences that it offers. The desire for that experience is not expected to notably change due to minor increases in travel time. This FDR/FEIS states that some highway-dependent uses near Interchange 25 could be vulnerable to lost revenues because of the diversion of some traffic to I-481 (future I-81). Refer to **Section 6-3-2.4.3** and **Appendix D-2** for more information.

Individual stakeholders have been provided opportunity to comment on and shape the Project Scoping Report and the DDR/DEIS. Following the public release of the preliminary DDR/DEIS in April 2019, NYSDOT carefully considered public comments and refined build alternatives and DDR/DEIS analyses to address public comments. Through the public review process for the DDR/DEIS, NYSDOT and FHWA accepted comments from interested parties, who could provide additional information beyond that found in the DDR/DEIS analysis; NYSDOT considered all comments in developing this FDR/FEIS.

C 7-53: The DDR/DEIS projects that hotels on Interchange 25 will lose only 1.3 percent of their customers under the Community Grid Alternative. However, the study does not incorporate information directly from hotel owners, staff, and customers who will say that the hotels thrive because of their proximity to I-81.

R 7-53: **Section 6-3-2** of the FDR/FEIS provides an explanation of the methodology used to estimate the potential loss of consumer base under the Community Grid Alternative. To quantify the potential loss in consumer base, the percentage of pass-by trips expected to be “captured” as customers under existing and future conditions with the Community Grid Alternative was estimated. StreetLight data were used to estimate that 25.2 percent of all hotel customers currently travel on I-81 from points north and south of the I-481 interchanges. Based on survey data from Visit Syracuse report, for overnight leisure trips, approximately 4 percent of domestic travelers and 8 percent of international travelers who stayed at hotels in Onondaga County were passing through Onondaga County in route to another destination; based on this visitor profile, the analysis applied a weighted average of 5.3 percent pass-by capture for hotel uses near Interchanges 23 through 25. Based on these analytic assumptions, approximately 5.3 percent of the 25.2 percent of all hotel customers—equaling 1.3 percent of all hotel customers—are pass-by captures that would be re-routed under the Community Grid Alternative and therefore would no longer be expected to frequent the hotels near Interchanges 23 through 25.

The analysis in **Section 6-3-2** of the DDR/DEIS was provided in response to public comments, including comments from hotel owners. Based on the concerns cited by commenters, NYSDOT developed a methodology for the analysis of potential effects on hotels that relied on publicly available data, supplemented by years 2013-2019 hotel trend data for the Liverpool, New York area purchased from STR, Inc., and StreetLight data specific to the hotels at Interchanges 23 through 25. StreetLight data is an on-demand mobility analytics platform that takes and analyzes vehicle movements using data from mobile devices, connected cars and trucks, as well as census data, road network information and more. This data was used

to determine the number of trips during different periods of time and by routes to destination. The data includes all vehicles to/from a destination, including employees and visitors.

Through the DDR/DEIS public review process, NYSDOT and FHWA solicited comments from interested parties and considered these comments in developing and issuing findings in this FDR/FEIS. At a meeting with 12 hotel representatives held at their request on September 13, 2021, NYSDOT discussed the study and agreed to consider additional information that was subsequently sent by some of the representatives, including employment estimates, hotel amenities, guest composition and origins, advance bookings vs. walk-in reservations, length of stay, and brand loyalty membership. As a result of this process, STR hotel and StreetLight data were supplemented in this FDR/FEIS with data from the hotels. The information provided by the hotels included confidential performance data, and therefore, it is not provided in the appendix to the FDR/FEIS.

C 7-54: The economic study in the DDR/DEIS relies on data from the Syracuse Convention and Visitors Bureau. They favor downtown hotels and not the hotels most impacted by this project. The EIS must study walk-in traffic and better explain the origins and destinations of the hotel guests.

R 7-54: As noted in **Section 6-3-2** of the DDR/DEIS, Onondaga County hotel visitor statistics were obtained from Visit Syracuse, Onondaga County, New York, Travel Market Research, prepared for Visit Syracuse by Young Strategies, Inc., dated November 2015 (the "Visit Syracuse Report"). The report was commissioned by Visit Syracuse (formerly known as the Syracuse Convention and Visitors Bureau) to provide a research-based tourism market study that identifies the current market profile and the attractors/motivators to Syracuse and Onondaga County. The specific data used from the report was based on responses to an online survey of over 1,300 visitors and provided valuable and objective (response-based) information related to visitor types and trip purposes. The analysis described in **Section 6-3-2** used StreetLight data to estimate the potential loss in patronage at select business uses in the Central Study Area due to their inability to capture "pass-by traffic" that would be re-routed to I-481. StreetLight was used to identify the paths traffic currently takes to the hotel cluster in the vicinity of Interchange 25, and more specifically identify the percentage of hotel customer base that originate from I-81 north or south of its interchanges with I-481.

At a meeting with 12 hotel representatives held at their request on September 13, 2021, NYSDOT discussed the study and agreed to consider additional information that was subsequently sent by some of the representatives. However, none of the data was sufficient to estimate the origins of hotel customers better than the StreetLight data.

C 7-55: Data from the Comfort Inn & Suites-Liverpool shows that at least 11 percent of revenue is from walk-in guests. This does not include same-day reservations made online (59 percent of reservations are made on the day of arrival). This shows that the DDR/DEIS underestimates by a magnitude of 6 to 10 times or more the effect that rerouting travelers to I-481 (future I-81) will have on the hotels in Salina. It should be noted that the walk-in reservations number is likely underestimated by 2-3 times because of how front desk staff check-in guests.

- R 7-55: The Community Grid Alternative would not substantively diminish the ability of the Interchange 25 hotels to attract visitors that value convenience and easy and direct access to I-81 or the entire Syracuse and Onondaga County region. For those travelers intending to stay in the Syracuse area, the 7th North Street hotels will continue to be immediately proximate to I-90. For travelers arriving from points north or south of the I-481 interchange, and/or for those intending to travel further on I-81 after their stay, the difference in travel times between the I-81 and BL 81 under the Community Grid Alternative would be 5 minutes or less, which would unlikely be enough difference to alter travel decisions for a vast majority of out-of-town guests. Travelers can be expected to continue to stay at these hotels because the de minimis change in travel time between I-81 and BL 81 would have no effect on the overarching reason that the traveler chooses to visit the Syracuse area or to stay at a particular hotel, which can be attributed to proximity to an attraction (e.g., Destiny USA or the planned aquarium at the Inner Harbor) or airport, cost, amenities, brand loyalty, among other factors.
- C 7-56: While the numbers are not available, the Holiday Inn Express-Syracuse Airport has a lot of business with travelers from Canada. This includes travelers headed farther south that just happened to stop for the night and would likely be rerouted to the current I-481 (future I-81) under the Community Grid Alternative. As further infrastructure is added on the improved I-481, there will be more hotels added to an already saturated market. The number of rooms has grown considerably in the past 5 to 7 years and even on the most popular city-wide events, hotels struggled to fill all their rooms. The COVID pandemic did result in some rooms leaving the market, but it only served to right size the area. New hotels bring more rooms competing for the same demand. A changed and rebuilt I-81 will not generate new demand for the market.
- R 7-56: The Community Grid Alternative would not substantively diminish the ability of hotels between I-690 and the I-481 north interchange to attract visitors that value convenience and easy and direct access to I-81 or the entire Syracuse and Onondaga County region. For those travelers intending to stay in the Syracuse area, this area will continue to be immediately proximate to I-90 and the airport. For travelers arriving from points north or south of the I-481 interchange, and/or for those intending to travel further on I-81 after their stay, the difference in travel times between the I-81 and BL 81 under the Community Grid Alternative would be 5 minutes or less, which is not a large enough difference to alter travel decisions for a vast majority of out-of-town guests. Travelers can be expected to continue to stay at these hotels because the de minimis change in travel time between I-81 and BL 81 would have no effect on the overarching reason that the traveler chooses to visit the Syracuse area or to stay at a particular hotel, which can be attributed to proximity to an attraction (e.g., Destiny USA or the planned aquarium at the Inner Harbor) or airport, cost, amenities, and brand loyalty.

Section 6-3-2 of the DDR/DEIS and FDR/FEIS considers the potential for induced business growth due to the diversion of north-south traffic from the existing I-81 corridor to I-481. As detailed in the analyses, this could modestly increase the consumer base of, and demand for, new highway-oriented development at certain existing I-481 interchanges. **Section 6-3-2** of the DDR/DEIS and FDR/FEIS also considers the potential for indirect business displacement

due to potential changes in consumer travel patterns and identifies an estimated 1.3 percent loss in consumer base for hotels located at 7th North Street.

- C 7-57: The importance of location to Hilton Hotels cannot be accurately measured. Same day/walk-in reservations are the same type of reservation. This type of reservation is made by a guest choosing one of the hotels on the day of their stay and accounts for at least This is 20 percent of business. Location is the deciding factor for most. Hilton purchased its first hotel at Exit 25 in 1982. From that point forward, three additional hotels were built at Exit 25. In the last five years, two of the original hotels were demolished and \$25 million was invested in two new hotels. All because of location. Hilton has also developed several out parcels with amenities that serve out-of-town travelers, making the hotels an easy “on and off the highway” choice.
- R 7-57: See the response to **Comment 7-55**.
- C 7-58: The developers of Shoppingtown Mall are considering the construction of a hotel since they will benefit from the rerouting of traffic to I-481 (future I-81). This demonstrates that businesses on 7 North Street and Destiny USA will be hurt by this project.
- R 7-58: **Section 6-3-2** of the DDR/DEIS and FDR/FEIS considers the potential for induced business growth due to the diversion of north-south traffic from the existing I-81 corridor to I-481. As detailed in the analyses, this could modestly increase the consumer base of, and demand for, new highway-oriented development at certain existing I-481 interchanges. **Section 6-3-2** of the DDR/DEIS and FDR/FEIS also considers the potential for indirect business displacement due to potential changes in consumer travel patterns and identifies an estimated 1.3 percent loss in consumer base for hotels located at 7th North Street.
- C 7-59: The economic data has shortcomings, including old data, and does not consider new economic development such as the Amazon distribution center.
- The market information which was used has shortcomings. The labor force data is from the 2000 U.S. Census. There is now 2020 U.S. Census data that should be used.
 - The current and forecasted employment conditions are irrelevant. The DDR/DEIS does not even discuss the new Amazon Distribution Center.
 - There are multiple sources that will develop different estimations, even though the estimates are for the same market.
 - Data was not collected locally and only a metro area was study, not suburban areas.
 - There was no outreach to Destiny USA or area hotels for information or data.
- R 7-59: The analyses in **Section 6-3-2** of the DDR/DEIS and FDR/FEIS use data sources and methodologies appropriate for environmental analyses under NEPA and SEQRA, and the analysis in the DDR/DEIS utilized the most current demographic and business data available at the time they were prepared. The analyses utilize a combination of historic and current data to present trends over time. Data from the 2000 Census is used to document trends since 2000; for example, the analysis compares the size of the labor force in 2000 (using Census

2000 data) to the current labor force using 2015-2019 Census American Community Survey data (the 2020 Census does not provide labor force estimates).

The analyses in **Section 6-3-2** considered both regional and local economic effects, using both regional and local data sets. As described in **Section 6-1**, the following four study areas were identified for the Project: Central Study Area, I-481 South Study Area, I-481 East Study Area, and I-481 North Study Area (see **Figure 6-1-1**). In addition, the assessment of economic effects includes three regional study areas: the City of Syracuse, Onondaga County, and the 5-County Region (Onondaga County, Oswego County, Cayuga County, Cortland County, and Madison County). In response to public comments on the April 2019 preliminary DDR/DEIS, expanded economic study areas were considered for the Community Grid Alternative, which include key destinations and locations, adjacent to or near the above study areas, that could experience increases or decreases in consumer base due to changes in travel time and traffic volumes under that alternative. For these local area analyses, primary data were utilized, including STR, Inc. data, which provided performance metrics specific to the hotels located at 7th North Street, and StreetLight data, which provided point-of-origin data for vehicles entering the hotel properties at 7th North Street.

Specific reference to, and consideration of, the planned Amazon distribution center would not alter the findings of the economic analysis. **Section 6-3-2** considers the potential for induced economic growth and the potential for indirect business displacement because of the project alternatives, including the potential economic effects on freight (truck) traffic. As detailed in **Section 6-3-2**, the projected changes in travel patterns with the Community Grid Alternative are not expected to adversely affect local or regional economic conditions. (Refer to the response to **Comment 6-28** regarding a review of traffic associated with the Amazon facility.)

Individual stakeholders were provided an opportunity to comment on the Project Scoping Report and the DDR/DEIS. Following the public release of the preliminary DDR/DEIS in April 2019, NYSDOT considered public comments and refined build alternatives and DDR/DEIS analyses to address public comments. Through the DDR/DEIS public review process, NYSDOT and FHWA again solicited comments from the public and considered all substantive comments in developing this FDR/FEIS.

At a meeting with 12 hotel representatives held at their request on September 13, 2021, NYSDOT discussed the study and agreed to consider additional information that was subsequently sent by some of the representatives. The STR and StreetLight data were supplemented in this FDR/FEIS with data provided by these hotels.

- C 7-60: Since BL 81 would remain a limited-access highway between I-690 and Mattydale, there will be limited impact to businesses along this segment of the corridor. However, the DDR/DEIS overlooks the potential business opportunities along the new I-81 (existing I-481).
- R 7-60: **Section 6-3-2.4.3** of the FEIS considers the potential for induced business growth due to the diversion of north-south traffic from the existing I-81 corridor to I-481. As detailed in the analyses, this could modestly increase the consumer base of, and demand for, new highway-oriented development at certain existing I-481 interchanges.

- C 7-61: There are numerous economic benefits of the Community Grid Alternative. An elevated highway allows people to bypass a business, but the Community Grid Alternative will improve the visibility and vitality of local businesses.
- R 7-61: Comment noted.
- C 7-62: The rerouting of truck traffic to I-481 will have a substantial impact on commuters and commerce. It will add miles, travel time, fuel cost, and wage costs to their operations and that will be passed on to consumers.
- R 7-62: **Section 6-3-2** of the DDR/DEIS and FDR/FEIS presents an assessment of potential beneficial and adverse effects of the project alternatives, including potential effects of rerouting freight (trucking) trips, on the local and regional economies. As detailed in **Section 6-3-2**, the Community Grid Alternative may increase travel time for some freight trips. For the most part, the greatest change (4 to 6 minutes) would be for trucks with origins or destinations in the Central Study Area. As these are trips to and from specific locations, the change in travel time would not substantially impact freight operations in the Central Study Area. There would be less change in travel time to other freight hubs. Overall, the Community Grid Alternative would not impede freight movement in the study area.
- Refer to the response to **Comment 5-17** regarding travel time.
- As stated in **Section 6-4-4.4** of the DDR/DEIS and FDR/FEIS, which examines changes in emissions associated with the Project, the Community Grid Alternative would not result in adverse effects on air quality.
- The DDR/DEIS and FDR/FEIS (see **Section 6-3-2**) examine the potential effects of the project alternatives on the local and regional economies. The analyses find that the projected changes in travel times would not have substantial adverse effects on the local or regional economies.
- C 7-63: The Community Grid will not increase property values near the existing viaduct. Much of the property near the viaduct is owned by Syracuse University and the hospitals. The Project will not generate profit.
- R 7-63: The DDR/DEIS and FDR/FEIS do not state that the Project will generate new property taxes. The DDR/DEIS and FDR/FEIS describe the potential surplus right-of-way under the Community Grid Alternative (see **Section 6-4-1.4.3**), but it does not speculate on the future use or value of that land.
- C 7-64: The Community Grid Alternative will diminish property values along the future I-81 (existing I-481) and adversely affect businesses that have been established along the existing I-81 (e.g., Destiny Mall, hotels on 7th North Street, etc.), while having limited economic benefit in downtown Syracuse.

- R 7-64: **Sections 6-3-2.4.1 and 6-3-2.4.4** of the DDR/DEIS and FDR/FEIS describe the potential economic benefits of the Community Grid Alternative, including the potential for redevelopment of surplus non-transportation land and lack of indirect effects on businesses in the metropolitan region. The DDR/DEIS and FDR/FEIS did not identify any adverse direct or indirect effects from the Community Grid Alternative on social or economic conditions in the South, East, or North I-481 Study Areas. In response to comments received following publication of the preliminary DDR/DEIS in April 2019, NYSDOT prepared a more detailed, supplemental analysis of the effects of changes in travel patterns and travel times on business operations under the Community Grid Alternative (see **Appendix D-2**). The analysis considers the potential benefits and effects of both build alternatives on the local and regional economies (see **Section 6-3-2**).
- C 7-65: There have been statements that the Project will promote economic growth in Syracuse. Yet, the DDR/DEIS has no mention of economic growth.
- R 7-65: **Section 6-3-2** of the DDR/DEIS and FDR/FEIS presents an assessment of potential beneficial and adverse effects of the Project alternatives, and the potential to induce economic growth in the local and regional economies.
- C 7-66: Uniting the community on either side of I-81 is a nice idea, but businesses in downtown Syracuse will choose to move to the suburbs to keep/attract employees and customers. Downtown Syracuse will suffer economically.
- R 7-66: The analysis in **Section 6-3-2.4.1** of the DDR/DEIS and FDR/FEIS considered the potential effects of the Community Grid Alternative on business conditions in the Central Study Area, which includes Downtown Syracuse. The analysis found that the Community Grid Alternative would not result in adverse impacts due to business displacement from the downtown area. While the Community Grid Alternative would result in some slight travel time increases through the Project Area, the increases would not be large enough to adversely affect business' ability to attract customers or employees. In addition, the Community Grid Alternative would improve the connectivity of the Central Study Area by re-establishing east-west crossings along Almond Street, re-establishing the street grid in the Near Eastside, providing new access points to and from BL 81 and I-690, and providing improved pedestrian and bicycle amenities and connections between Downtown/Southside and University Hill/Near Eastside. These pedestrian and traffic improvements would improve the flow of people and goods between these neighborhoods and could result in improved economic activity due to improved conditions for development currently supported by market conditions, namely mixed use residential and commercial.

7-7 HISTORIC AND CULTURAL RESOURCES

- C 7-67: There is an open parcel on the city's Near Northside bounded by the I-81 on ramp, Pearl Street, and East Willow Street. As evidenced by both the 1868 and 1874 bird's eye views of Syracuse, this parcel was the site of at least 5 or 6 salt blocks in the nineteenth century. They

were gone by the twentieth century and the area used for a farmers' market, but nothing too substantial was built over that site. Given its proximity to I-81 and its transition to the Community Grid street system, please identify the level of archaeological work/monitoring that might be done on that specific site.

- R 7-67: The Phase IA Archaeological Sensitivity Assessment (**Appendix E-3** of the DDR/DEIS and FDR/FEIS) includes a detailed summary of the potential for salt industry-related archaeological resources within the APE for Direct Effects. The summary notes that previous cultural resources investigations conducted within the area west of I-81 have identified structural remains (including wooden pipes and troughs, and foundations of pump houses) associated with the salt industry between four and eight feet beneath the surface (EDR, 2017: 198). The Phase IA Archaeological Sensitivity Assessment also includes an analysis entitled "Potential Significance of Salt Industry and other Commercial-Industrial Archaeological Sites," which concludes:

It is assumed that foundations and other structural remains associated with many of these larger commercial buildings are located throughout the APE for Direct Effects. In most cases, the foundations or structural remains unto themselves are unlikely to be considered archaeologically or historically significant, in large part because the location, dimensions, and arrangement of those buildings can be well understood based on review of historic cartographic sources and because archaeological data is unlikely to contribute significant new information. Therefore, although these sites are potentially ubiquitous throughout the APE for Direct Effects, archaeological investigation would be warranted only in those instances where archaeological data has the potential to contribute significant, meaningful new information (EDR, 2017: 201).

A review of the 1868 and 1874 bird's-eye views referenced in the comment indicated the presence of several salt sheds in the mid- to late nineteenth century on and adjacent to the open parcel on the city's Near Northside bounded by the I-81 on-ramp, Pearl Street, and East Willow Street. However, these salt sheds do not appear on other historic maps from the same period, and it is not known when they were constructed.

Historic maps and sources reviewed as part of the Phase IA Archaeological Sensitivity Assessment show that the construction of the New York West Shore and Buffalo Railroad in 1883 bisected the parcels where the salt sheds were once located (see **Appendix E-3** of the DDR/DEIS and FDR/FEIS: Phase IA Archaeological Sensitivity Assessment, Appendix A: Map 4). The area to the north of the railroad right-of-way was occupied by a coal shed and coal yard until approximately 1920, when the land was cleared for a farmers' market. The railroad right-of-way was expanded in 1935, elevated in 1941, and then repurposed as part of the construction of I-690 in 1962. The parcel north of the railroad right-of-way was further bisected by the construction of an on-ramp for I-81. Therefore, the likelihood for intact and potentially significant archaeological features to be present on this parcel may be limited, given subsequent construction/development and/or demolition activities.

NYSDOT is preparing a Construction Phase Archaeological Work Plan that will identify the locations of anticipated machine-aided archeological investigations and archaeological monitoring that will occur prior to or during planned construction activities. The location specified by the commenter will be considered as part of this evaluation as a potential candidate for machine-aided archaeological testing and/or monitoring.

- C 7-68: For better or worse, the I-81 viaduct is part of the history of Syracuse. As part of the Community Grid Alternative, could one or two of the iconic “T” concrete pylons, say near I-690, be retained as a remembrance of the viaduct. Their distinctive size, materials, and design could be woven into a stand-alone green space and kept as posterity to remember the viaduct. Maybe even with some interpretive materials.
- R 7-68: The bridges carrying I-81 through Syracuse have steel “I” beams which support the highway, not concrete “T” beams. The preservation of a specific material from the existing bridge is a possibility if a location and suitable owner can assume the responsibility.
- C 7-69: The Community Grid Alternative is the least detrimental to historic resources.
- R 7-69: The potential effects of both Build Alternatives on the historic resources in the Project Area are discussed in **Section 6-4-1** of the DDR/DEIS and FDR/FEIS.
- C 7-70: It is important that the Erie Canal Museum and area be preserved.
- R 7-70: Neither the Viaduct nor the Community Grid Alternative would require acquisition of the Erie Canal Museum. The Community Grid Alternative includes urban design elements to create a Canal District around the museum.
- C 7-71: While NYSDOT did include Oakwood in the project’s Area of Potential Effects, it did not identify any project effects upon the cemetery. It is our opinion that design of the new roadway will perpetuate the adverse effects of I-81 that have been ongoing since its construction. Mitigation is needed to address these effects, which made the historic entrance area—including the gate, chapel, and old office—unviable for contemporary use.
- R 7-71: Under Section 106, the assessment of effects is based on the undertaking’s proposed changes to the National Register-qualifying characteristics of the historic property, based on the existing conditions of the property and its setting. Near Oakwood Cemetery, the I-81 Viaduct Project would maintain the existing highway alignment on the embankment through this area. While the Project does not mitigate the effects of past actions, it proposes no changes that would cause cumulative effects to the Oakwood Cemetery. Implementation of the Project would not preclude others from making improvements to the grounds of the Oakwood Cemetery as part of an independent, future action.
- C 7-72: SHPO’s finding that there would be no adverse effect from the Project on Oakwood Cemetery is incorrect. This finding is based on an outdated view of direct project effects on buildings

and structures, not on the larger historic landscape. Oakwood Cemetery is a historic landscape that is adjacent to and overlooks I-81; the current proposed boulevard/community grid starts just 150 feet north of the main gate. This design will introduce additional noise intrusion into Oakwood as cars and trucks slam on their brakes on approach to the first traffic intersection at MLK School. More importantly, the design will maintain the adverse effect of the current highway in blocking the Oakwood Cemetery gate and inhibiting viable use and public access to the original and most historic section of the cemetery. There must be mitigation for Oakwood Cemetery as part of the Section 106 review. If the design of the roadway as it extends along the frontage of Oakwood Cemetery is redesigned in response to community concerns about the roundabout near the MLK School, this will be an opportunity for NYSDOT and FHWA to reopen and reassess its findings of effect on Oakwood Cemetery. Please also clarify if NYSDOT and FHWA will be convening the Section 106 Consulting Parties to seek comments on the current DDR/DEIS, or future revised plans.

- R 7-72: NYSDOT and FHWA have acknowledged and addressed multiple public comments regarding Oakwood Cemetery's original entrance and the assessment of effects on the historic cemetery under Section 106 of the National Historic Preservation Act. The matter was discussed previously in a March 31, 2021, meeting between NYSDOT, FHWA, and Consulting Parties and is further addressed in an August 21, 2021 letter from NYSDOT to FHWA (see **Appendix E-7** of this FDR/FEIS).

As explained in the August 21, 2021 letter, in applying the Criteria of Adverse Effect (36 CFR 800.5(a)(1)), NYSDOT in coordination with FHWA concluded that the Project would not alter the character or setting of Oakwood Cemetery compared to existing conditions. Because no adverse effect on Oakwood Cemetery has been identified, no mitigation would be required or warranted. In consideration of the comments received from Consulting Parties, however, NYSDOT reviewed an at-grade intersection with Business Loop (BL) 81 concept and a grade-separated crossing concept carrying BL 81 over a reconnected Oakwood Avenue to reestablish the former entrance to the Oakwood Cemetery. An analysis of these options concluded that neither of these options were reasonable and safety concerns were identified with each option. Further, in a July 22, 2021, letter to NYSDOT, Oakwood Cemeteries, Inc., "the sole entity authorized to take positions on behalf of the cemetery," commented that they have no plans to reopen the original main entrance of the cemetery due to concerns relating to vandalism and public safety.

The Section 106 Consulting Parties were advised of the availability of the DDR/DEIS, but no Consulting Parties meeting was held.

7-8 PARKLANDS AND RECREATIONAL RESOURCES

- C 7-73: In Section 6-4-2, "Parklands and Recreation Resources," the DDR/DEIS notes that Forman Park has received LWCF assistance. The New York State Office of Parks, Recreation, and Historic Preservation has determined that there are 12 outdoor recreation sites that have received such assistance within the Study Areas, including Forman Park. If this Project has the potential to impact access or outdoor recreation opportunities at any of these sites, please

initiate consultation with the New York State Office of Parks, Recreation, and Historic Preservation.

- R 7-73: **Section 6-4-2** of the FDR/FEIS has been updated to incorporate the information provided by the New York State Office of Parks, Recreation, and Historic Preservation. As described in **Section 6-4-2**, the Project would not affect outdoor recreation at these facilities, and therefore, further consultation is unnecessary.
- C 7-74: Based on a review of the document by the National Parks Service, the proposed project should not cause a conversion of LWCF properties. However, should the project alignment change and result in a conversion of LWCF protected parkland at Forman Park or any other LWCF assisted site in the study area, coordination with the NPS and the New York State Office of Parks, Recreation and Historic Preservation would be required.
- R 7-74: Comment noted.
- C 7-75: Please identify who will maintain the new greenspace along Onondaga Creek.
- R 7-75: The City of Syracuse would be responsible for maintaining the greenspace adjacent to Onondaga Creek.
- C 7-76: The proposed improvements to Onondaga Creekwalk will be a great addition to the city.
- R 7-76: Comment noted.
- C 7-77: NYSDOT should provide additional parks along the new Almond Street.
- R 7-77: NYSDOT would include landscape enhancements within the transportation right-of-way of the new Almond Street under the Community Grid Alternative. There is insufficient area within this right-of-way way to program active recreation spaces such as athletic fields and playgrounds. Wilson Park, which is immediately west of Almond Street, would be improved as part of the Project. The improvements include construction of a new basketball court, refurbishment of an existing court, a new splash pad, and reseeding of a lawn area that could be used for active recreation. Please refer to the response to **Comment 7-9** about the future use of potential surplus right-of-way.
- C 7-78: NYSDOT must deliver a comprehensive approach that addresses parks amenities.
- R 7-78: Both the Viaduct and Community Grid Alternatives would include pedestrian and bicycle facilities, including on-street bicycle lanes and an extension of the Creekwalk. Both alternatives would also make improvements to portions of Wilson Park (see **Sections 6-4-2.3.2 and 6-4-2.4.2** of the DDR/DEIS and FDR/FEIS). The Community Grid Alternative would facilitate the reuse of transportation right-of-way for another purpose, which could include new parkland and open space.

C 7-79: The proposed project will temporarily impact Wilson Park, an Urban Park and Recreation Recovery (UPARR) Program assisted site, but since the impacts to recreation resources are not permanent and the park will be returned to its current uses upon the completion of construction, no UPARR conversion is caused. However, should the project change and result in a conversion of UPARR protected parkland at Wilson Park or any other UPARR assisted site in the study area, coordination with the National Parks Service would be required.

R 7-79: Comment noted.

7-9 VISUAL RESOURCES AND AESTHETIC CONSIDERATIONS

C 7-80: There is no rendering of the project from Od Liverpool Road to the current I-481 north of Taft Road.

R 7-80: There are no proposed changes to the proposed BL 81 between Old Liverpool Road and the I-481 north interchange except at the I-481 north interchange and new or modified noise barriers at certain locations. Therefore, NYSDOT did not produce visualizations or renderings of this area.

C 7-81: When people are rerouted to I-481, they will no longer have the wonderful view of Syracuse as you approach it from the south on the current I-81.

R 7-81: Drivers who wish to travel through the city may use BL 81. As shown in renderings in **Section 6-4-3** of the DDR/DEIS and FDR/FEIS, there will be views of the Syracuse skyline from BL 81.

C 7-82: Bury power lines to reduce the number of electric poles, which ruin our views.

R 7-82: The comment is outside the scope of the I-81 Viaduct Project.

C 7-83: There is no discussion of the architectural/visual redesign of the planned I-690 viaduct rebuild through downtown.

R 7-83: As stated in **Section 5.6.3** of the DDR/DEIS and FDR/FEIS, all bridges would conform to the NYSDOT Bridge Manual standards and would incorporate aesthetic treatments where appropriate.

7-10 AIR QUALITY, ENERGY, AND CLIMATE CHANGE

C 7-84: The Community Grid Alternative will create traffic congestion that degrades air quality. The project cannot worsen air quality for people who live near I-81.

R 7-84: The DDR/DEIS and FDR/FEIS include a detailed analysis of the potential air quality effects of the Community Grid Alternative using USEPA, FHWA, and NYSDOT methodologies. The

analysis concluded that the Community Grid Alternative would not result in adverse effects on air quality within the Project Area (see **Section 6-4-4.4**).

- C 7-85: Demonstrate how the Community Grid Alternative would improve air quality.
- R 7-85: **Section 6-4-4.4** of the DDR/DEIS and FDR/FEIS describes regional and local effects on air quality from the Community Grid Alternative. The analysis concludes that the Community Grid Alternative would not result in adverse impacts on air quality. The analysis shows that regional emissions would decrease under the Community Grid Alternative (see **Table 6-4-4-9**). The analysis showed a minor increase in Particulate Matter (PM) concentrations at three of the four receptor sites, but these concentrations would be well below National Ambient Air Quality Standards.
- C 7-86: Diesel-powered, commercial vehicles generate substantial pollution. This will worsen when trucks travel at street level in stop-and-go traffic. Commercial vehicles must be restricted to use the future I-81 around Syracuse rather than BL 81 through the city.
- R 7-86: Under the Community Grid Alternative some through traffic, including trucks, would divert to I-481 (future I-81) around the city. However, some trucks traveling to local destinations would use BL 81. **Section 6-4-4.4** of the DDR/DEIS and FDR/FEIS describes regional and local effects on air quality from the Community Grid Alternative. The analysis concludes that the Community Grid Alternative would not result in adverse impacts on air quality.
- C 7-87: The existing I-81 produces lots of dust and dirt, and therefore, it diminishes air quality.
- R 7-87: The DDR/DEIS and FDR/FEIS include a detailed analysis of the potential air quality effects of the Project alternatives using USEPA, FHWA, and NYSDOT methodologies. The analysis concludes that the Viaduct and Community Grid Alternatives would not result in adverse effects on air quality within the Project Area (see **Section 6-4-4.3** and **Section 6-4-4.4**).
- C 7-88: The impact of emissions from idling traffic at the new traffic light on Route 5/92 (eastbound) and the extended four-lane off-ramp next to the Pickwick neighborhood should be studied.
- R 7-88: The potential for air quality impacts due to localized roadway conditions was analyzed in **Section 6-4-4.4.1** of the DDR/DEIS and FDR/FEIS for the Community Grid Alternative. The NYSDOT screening procedures based on roadway level of service, traffic volumes (both total volumes and projected incremental volumes), vehicle speeds, and projected increased emissions were initially used and no exceedance of screening thresholds was found. However, additional refined air quality analyses to determine the potential impact to air quality conditions were performed for worst-case intersection locations based on the traffic conditions as well as proximity to sensitive receptors. Pollutant concentrations at other intersections within the study area are anticipated to be similar or less than those projected for the analyzed intersections. As discussed in the DDR/DEIS and FDR/FEIS, Project pollutant concentrations would be below the appropriate National Ambient Air Quality Standards (NAAQS) and would

not be substantially different from concentrations projected under the No Build Alternative, as the background concentrations were the dominant component in the total concentrations.

C 7-89: Provide air filtration improvements and noise barriers at the Dr. King Elementary School to mitigate impacts from the traffic of BL 81 and the proposed roundabout.

R 7-89: As described in **Chapter 3** of this FDR/FEIS, based on public input received during the DDR/DEIS public comment period, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East in the vicinity of Dr. King Elementary School as part of the Community Grid Alternative. By eliminating the roundabout in this location, the proposed transportation system would be moved as far away as practicable from the school.

As stated in **Chapter 4 (Table 4-7), Section 6-2-3, and Section 6-4-4** of this FDR/FEIS, an outdoor ambient air quality monitoring program would be implemented during construction of the Project and would be overseen by NYSDOT. The program would consist of real-time particulate monitoring at a few locations within the local community, including locations within the environmental justice community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design.

The noise analysis indicated that, based on the NYSDOT Noise Policy, predicted future noise levels in the area around the Dr. King Elementary School are below the noise abatement criteria for schools (refer to **Table 6-4-6-2** of the DDR/DEIS and FDR/FEIS for FHWA Noise Abatement Criteria and Activity Categories). Therefore, noise abatement is not recommended for this area. Note that under the Community Grid Alternative, the roadbed of the current I-81 will be removed; however, a portion of the embankment would be left in place. The roadway alignment of the Community Grid Alternative would be at a lower elevation than the current I-81 and horizontally farther to the east, and the remaining portion of the former I-81 embankment would form a berm between the new roadway and the school. Under the current design, the berm would form a barrier up to 20 feet high in some of the more northern locations and back to grade in the area of the proposed shared use (bicycle/pedestrian) path along MLK, Jr. East. A benefit of this berm is that a berm is normally more effective at reducing noise than a concrete barrier. Regardless, the noise study has shown that a concrete noise barrier in this location would not be effective enough to be recommended for reducing traffic noise at the Dr. King School.

C 7-90: The history and topography in Syracuse indicate that this is an area especially prone to valleyscale atmospheric inversions, much like many bowl-shaped cities. These inversions often occur along steep-sloped areas, like where I-81 runs along the South Side. Address the problem with having a major road between a sudden slope on one side, and dense residential neighborhoods on the other, and how air currents may wash down over the roadway, carrying pollutants into the valley. NYSDOT's complete lack of actual air quality data in the DEIS indicates their position as not considering air quality an issue here. The asthma, COPD and

Cardio condition rates speak otherwise, though to date no one has conducted a proper attributional study on these, nor a health impact assessment on the Project.

- R 7-90: As discussed in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, the Viaduct and Community Grid Alternatives would result in decreases to regional pollutant emissions from vehicles and pollutant emissions that may be captured within a layer of cooler air beneath a potential inversion layer. Furthermore, the air quality analysis assessed pollutant concentrations at locations in the immediate vicinity to the proposed roadways and are not anticipated to be affected. **Section 6-4-4** of the DDR/DEIS and FDR/FEIS includes a refined air quality dispersion analysis at individual intersections, an assessment of regional pollutant emissions, and a refined air quality dispersion analysis of construction activities that includes on-site construction equipment, construction vehicles traveling on the roadway network, and the impact these activities would have on the existing roadway network. Additional, post-FEIS coordination would be performed by NYSDOT.
- C 7-91: Have studies been done to prove the original 81 project and pollution from the cars directly through Syracuse contributed to the high rates of dementia in Onondaga County?

R 7-91: This is outside the scope of the Project.

7-11 NOISE

- C 7-92: The recommended noise barriers should be implemented.
- R 7-92: Comment noted.
- C 7-93: Include state of the art, attractive noise barriers along future I-81. Design and materials should be consistent throughout the Project. To limit the shadow effects of these tall structures on the affected businesses and neighborhoods, consider the use of transparent noise walls as used in the I-81 Binghamton project and the Tappan Zee Bridge project. The transparent noise walls would also help with any security concerns that a solid wall system presents.
- R 7-93: The aesthetics of noise barriers will be considered as design advances. Aesthetic design of the noise barriers would be developed by a team of landscape architects during final design and in coordination with Project stakeholders and the Urban Design Technical Advisory Panel (UDTAP), which includes landscape architects, architects, and a city representative.
- C 7-94: Install noise barriers in more locations than just those that meet the “feasible and reasonable” criteria. These structures provide enhanced quality of life, making it possible for under- and de-valued properties to not be as impacted by the presence of the adjacent highway.
- R 7-94: As indicated in **Section 6-4-6** of the DDR/DEIS and FDR/FEIS, noise barriers are recommended in locations that are found to be feasible and reasonable based on factors in FHWA noise regulation in 23 Code of Federal Regulations (CFR) Part 772 and the NYSDOT Noise Policy. One of the main purposes of 23 CFR 772 is to identify criteria that must be met

to allow the use of Federal funds for noise abatement measures. Since this project will be federally funded, noise barriers cannot be constructed in locations that do not meet the FHWA noise abatement feasibility and reasonableness criteria. Additionally, it is NYSDOT policy to address traffic noise concerns resulting from transportation projects by complying with FHWA regulations for Federal-aid projects and by also applying the policy and procedures to State-funded projects.

- C 7-95: Traffic noise is a terrible problem for the residents south of MLK, Jr. East. The proposed construction of noise barriers along the viaduct could reduce the current and future noise levels to a certain extent, but they will not likely improve things very much. Therefore, to complement the noise barriers, NYSDOT should distribute noise-canceling earbuds or headphones, such as those being offered by Bose to the community members living in the affected area. These noise-canceling devices could be one set appropriate for overnight wear and another, bulkier set for daytime activities.
- R 7-95: The DDR/DEIS and FDR/FEIS include an analysis of the residential area south of MLK Jr., East and identifies the construction of a noise barrier to mitigate increases in traffic noise. The proposal for noise-canceling headphones is outside the scope of the I-81 Viaduct Project.
- C 7-96: The Community Grid Alternative will increase noise near the Bear Street ramp and on Sunset Avenue in Syracuse. Please provide soundproofing for those residents.
- R 7-96: Approximately 13 noise impacts were predicted for the future Community Grid Alternative and 21 for the future Viaduct Alternative without noise abatement. Noise abatement is proposed in this area in the form of noise barriers. Noise Barrier 15 is recommended for the Community Grid Alternative and Noise Barriers 14 and 15 are recommended for the Viaduct Alternative. After implementation of the noise barriers, predicted noise impacts along Sunset Avenue would be reduced to 11 for the future Community Grid Alternative and 2 for the future Viaduct Alternative. Therefore, noise abatement in this area would reduce noise impacts by two for the Community Grid Alternative and 19 for the Viaduct Alternative. Additionally, along Sunset Avenue, the proposed noise barriers would “benefit” (reduce noise levels by 5 dBA or greater) one residence for the Community Grid Alternative and 14 residences for the Viaduct Alternative.
- C 7-97: Include a sound barrier along the border of the Roxboro Middle School campus ground, which borders I-81 northbound. The noise level has been steadily increasing over the years and the grounds of Roxboro school serve as an echo chamber causing the noise to go right into the homes of the people who live on the north side of Kirsch Drive as well as the people living at the very end of Kirsch Drive in the 400 block, in Mattydale. The highway sound level also likely has a negative effect on the schoolchildren at Roxboro Middle School. NYSDOT should visit the field/grounds behind Roxboro Middle School to evaluate the continual sound level and the effects on nearby residents and on the school. NYSDOT is invited to visit 326 Kirsch Drive to evaluate the sound level.

- R 7-97: The noise study for the I-81 Viaduct Project included field noise measurement, traffic noise modeling, and abatement analysis in the area identified within the comment. The abatement analysis found that noise Barriers 16A and 16B would be both feasible and reasonable for this area. Therefore, noise Barriers 16A and 16B are recommended in the area in question. Please refer to **Section 6-4-6** of the DDR/DEIS and FDR/FEIS for additional information on the noise analysis.
- C 7-98: Include noise barriers along I-81 between Exits 29 and 30.
- R 7-98: Noise barriers were considered where adverse traffic noise effects were identified within the noise study area under the build conditions for both the Viaduct and Community Grid Alternatives. Noise barriers that were deemed both feasible and reasonable under NYSDOT Noise Policy were recommended for construction. Areas north of Interchange 29 are outside the Project's noise study area and therefore were not considered for noise abatement.
- C 7-99: The Community Grid Alternative will increase traffic noise on I-481, and noise is already a serious problem in this area. NYSDOT must take measures to ensure that noise levels do not increase, and any noise impacts must be mitigated.
- R 7-99: The DDR/DEIS and FDR/FEIS include a detailed evaluation of traffic noise for the Community Grid Alternative in accordance with FHWA procedures and NYSDOT's Noise Policy (see **Section 6-4-6**). **Section 6-4-6** of the DDR/DEIS and FDR/FEIS describes the detailed analysis of the potential noise effects, considering the traffic level anticipated under both build alternatives and whether noise barriers are feasible and reasonable in areas where FHWA Noise Abatement Criteria exceedances were identified. Where increases in traffic noise would exceed impact criteria, the DDR/DEIS and FDR/FEIS identify mitigation measures, including noise barriers. The DDR/DEIS and FDR/FEIS recommend noise barriers at several locations, as shown in figures in **Sections 6-4-6.4.5** and **6-4-6.5.5**. Tables in **Sections 6-4-6.4.5** and **6-4-6.5.5** indicate the feasibility and reasonableness of each barrier considered. Vegetation removal is described and considered in **Section 6-4-8** and traffic and transportation considerations are described in **Chapter 5**.
- C 7-100: Please consider noise impacts for residents of Brighton Towers. Please consider a noise barrier to mitigate the noise.
- R 7-100: The Brighton Towers Apartments were included within the noise study area identified within the DDR/DEIS and FDR/FEIS. Modeled noise levels in the Brighton Towers area were considered and found to be below the Federal and State thresholds for impacts at residential land uses. While some individuals may still consider the traffic noise levels in this area annoying, the Federal and State thresholds are the standard. Since noise levels above the thresholds were not identified in the area of Brighton Towers, this area is not eligible for noise abatement on its own. Noise Abatement Study Area 10 included a small portion of the Brighton Towers property; however, the purpose of abatement study area 10 was to analyze noise impacts identified along East Seneca Turnpike. Regardless, it was determined that noise

abatement would not be feasible or reasonable within Noise Abatement Study Area 10. See **Section 6-4-6** of the DDR/DEIS and FDR/FEIS for further information on the noise study.

C 7-101: NYSDOT should install a noise barrier on I-481 along Jamesville Road.

R 7-101: Quantitative traffic noise analysis was performed for the neighborhoods in these areas and off Jamesville Road (including off Nottingham Road). Noise receivers were placed in the residential areas closest to I-481. The noise analysis determined that the traffic noise in this area, while audible from the homes in this area, does not reach the thresholds established in 23 CFR 772 (Procedures for Abatement of Highway Traffic Noise and Construction Noise) and the NYSDOT TEM, Section 4.4.18, "Noise Analysis Policy and Procedures" (or "NYSDOT Noise Policy") for warranting a noise barrier. Please refer to **Section 6-4-6** of the DDR/DEIS and FDR/FEIS for additional information on the noise analysis.

C 7-102: Noise will be worse for residents on East Seneca Turnpike in Jamesville. Clark Reservation, which is in between these residences and I-481, consists of limestone. Noise is going to echo off the limestone walls. This will make it impossible to abate the additional traffic noise.

R 7-102: As indicated within the comment, the terrain in this area is complex and tends to reflect noise in many directions. The East Seneca Turnpike is over half-mile away and approximately 200 feet higher in elevation than I-481 with no line-of-sight. While some traffic noise may reflect off the north steep slope along I-481, the steep walls of the taller Clark Reservation State Park are facing the highway and are essentially forming a 140-foot noise barrier that will tend to reduce noise traveling from I-481 to the residences along this area of the East Seneca Turnpike. Therefore, the amplification effect of the north steep slope would naturally be somewhat mitigated by the taller south steep slope. The noise modeling has shown that noise levels beyond approximately 500 feet from the roadway do not meet the Federal and State thresholds that would require consideration of noise mitigation. Additionally, for the aforementioned reasons, it is not anticipated that the landforms in this area would amplify the sound to a NAC impact level at the area in question. While traffic noise from I-481 may be audible from the commenter's residence to an extent that some individuals may consider annoying, I-481 traffic noise in this area does not reach the Federal and State thresholds for requiring noise abatement considerations.

C 7-103: There are cemeteries along Jamesville Road that suffer noise and visual impacts because of the highway. NYSDOT should build noise barriers as a gesture of respect for the people buried here.

R 7-103: These cemeteries are generally located 500 feet or more from the highway. Based on guidance provided in FHWA's "Highway Traffic Noise: Analysis and Abatement Guidance," the noise study area was defined as 500 feet from involved highways and 200 feet from involved local roadways. To confirm that noise impacts from the highway would not be present at this distance, modeled noise receivers were placed along the perimeter of the southern I-481 study area at 500 feet from the highway. The noise analysis determined that traffic noise

at 500 feet or greater, while audible from 500 feet, does not reach the thresholds established in 23 CFR 772 (Procedures for Abatement of Highway Traffic Noise and Construction Noise) and the NYSDOT TEM, Section 4.4.18, "Noise Analysis Policy and Procedures" (or "NYSDOT Noise Policy") for warranting noise barrier analysis. Additional information on the noise analysis is provided in **Section 6-4-6** of the DDR/DEIS and FDR/FEIS. The DDR/DEIS and FDR/FEIS did not identify an adverse change in the visual quality of this area, and therefore, mitigation is not required.

- C 7-104: Please provide a sound barrier between Rock Cut Road and Rams Gulch Road.
- R 7-104: As indicated in the DDR/DEIS and FDR/FEIS, quantitative abatement analysis was performed for this area under Noise Abatement Study Area 9. Except for the Cliffside Community, this area is somewhat sparsely populated with residential properties. As stated in the DDR/DEIS and FDR/FEIS, it was determined that rural clusters of five residences, or less, within the study area would not be considered reasonable under the NYSDOT Noise Policy. For this area, only the Cliffside Community met the NYSDOT Noise Policy's feasibility and reasonableness thresholds to warrant a noise barrier. Therefore, NYSDOT is proposing Noise Barrier #9 in this general location. Please refer to **Section 6-4-6.5** of the DDR/DEIS and FDR/FEIS.
- C 7-105: The Community Grid Alternative will increase traffic noise on I-481 in the Town of DeWitt. While the change might not exceed Federal standards for construction of noise barriers, the increase will still be noticeable for nearby residents. Please consider other options, such as pavement type, to reduce noise.
- R 7-105: The Community Grid Alternative will increase the traffic volumes along I-481; however, as the commenter indicated, noise barriers were not found to be feasible and/or reasonable in this area. As indicated in **Section 6-4-6.4.5** of the DDR/DEIS and FDR/FEIS, several noise abatement measures available to NYSDOT projects, such as traffic management measures, alteration of horizontal and vertical alignments, construction of noise barriers, acquisition of real property to serve as buffer zone, and noise insulation of publicly owned school buildings, were assessed for this area and only noise barriers were found to be reasonable. Noise analysis under the NYSDOT noise policy is related to the peak noise hour. The commenter is correct that noise may increase throughout the day to some extent; however, since the peak noise hour could not be abated to a sufficient level, the Project would be unable to abate other hours throughout the day. Regarding the comment on road material, new pavement is often somewhat quieter than old pavement. Paving materials used will meet strict NYSDOT standards.
- C 7-106: The redesign of Interchange 3 must include a noise barrier along the entire length of the affected highway through DeWitt. There is substantial highway noise in the DeWittshire neighborhood. There has been no study or plan to mitigate the noise.

- R 7-106: The Community Grid Alternative would reconfigure the interchange and increase the traffic volumes along I-481.

In accordance with FHWA's "Highway Traffic Noise Analysis and Abatement Policy and Guidance," a noise level change of 3 dB(A) or less is generally imperceptible to the human ear. This indicates that the average noise level increase of 2 dBA will likely not be noticeable; however, added peak noise levels may still be prominent (e.g., Jake brakes, modified mufflers, etc.). Given the increase in volumes and geometric alterations, the noise models indicate that there will be approximately a 2 dBA increase in average noise levels for the DeWitt residences adjacent to I-481 during the AM peak hour. As indicated in **Section 6-4-6.4.5** of the DDR/DEIS and FDR/FEIS, several noise abatement measures available to NYSDOT projects, such as traffic management measures, alteration of horizontal and vertical alignments, construction of noise barriers, acquisition of real property to serve as buffer zone, and noise insulation of publicly owned school buildings, were assessed for this area and only noise barriers were found to be reasonable. The recommendation for noise barriers is based on the standards and guidance provided within the NYSDOT Noise Analysis Policy.

Noise Abatement Study Areas 7, 8, 18, and 19 are in the DeWitt area. Specifically, noise abatement study areas 18 and 19 are in the DeWittshire, Ambergate Road area. Noise barriers are assessed individually and recommended if they are found to be feasible and reasonable based on the NYSDOT Noise Policy. Noise barriers 7B and 8B are recommended in the DeWitt Area. Barriers 18 and 19 were not recommended. Barrier 18 was found to be feasible but not reasonable because it did not benefit enough residences to meet the cost index (i.e., 2,000-square-foot per benefitted receiver) requirement. Barrier system 19 was found to be neither feasible nor reasonable because the barrier system would not offer enough of a noise reduction to meet the standard and it did not benefit enough residences to meet the cost index requirement. Based on NYSDOT Noise Analysis Policy, noise barriers at other locations near Interchange 3 were not found to be feasible and/or reasonable.

- C 7-107: There are no residential uses near the proposed noise barrier on Butternut Drive in DeWitt. However, there are homes on Towpath Drive where no barrier is proposed. There should be noise abatement on Towpath Road. Traffic noise is already bad on I-481, and it will be worse under the Community Grid Alternative.

- R 7-107: As indicated within the noise section of the DDR/DEIS and FDR/FEIS, Noise Barrier 7B is recommended for abatement of noise levels along Towpath Road. Noise Abatement Study Areas are not restricted to residences; they are based on noise impacts for land uses included within TABLE 1: 23 CFR, PART 772, NOISE ABATEMENT CRITERIA (NAC). Land uses with the same NAC level as residences include active sport areas, amphitheatres, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings. See **Section 6-4-6** of the DDR/DEIS and FDR/FEIS for further information on the noise study.

- C 7-108: Eliminate the proposed noise barrier near DeWitt Town Hall. Noise barriers here are unnecessary. With the nearby Erie Canal Park, this area already has a very beautiful landscape as is; there is no reason to add that unsightly wall to that area. The adjacent area is not a residential area, and if the traffic simulation numbers are correct, there is only incrementally more traffic passing through this area than it is as designed today.
- R 7-108: Noise abatement study areas are not restricted to residences. Noise abatement study areas are based on noise impacts for land uses included within TABLE 1: 23 CFR, PART 772, Noise Abatement Criteria (NAC). Land uses with the same NAC level as residences include active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, schools, television studios, trails, and trail crossings. Noise impacts are predicted for the Viaduct and Community Grid Alternatives; therefore, noise abatement analysis was conducted in this area (See **Sections 6-4-6.3.5 and 6-4-6.4.5** from the DDR/DEIS and FDR/FEIS). The noise abatement analysis was performed in accordance with NYSDOT's Noise Policy, and it was determined that a noise barrier should be recommended in this area. NYSDOT sought public input on proposed noise barriers and has considered this input when identifying recommended noise barriers.
- C 7-109: There must be noise barriers on I-481 between Exits 4 and 7 once traffic is rerouted.
- R 7-109: As indicated in the DDR/DEIS and FDR/FEIS, quantitative traffic noise modeling was performed for the entire study area, including between Exit 4 (Syracuse) and Exit 7 (Bridgeport). Noise impacts were identified for this area; however, noise barriers were not found to be reasonable in this area given the low density of the noise receivers proximate to the highway. The area in question contains isolated residences with clusters of five or fewer within the study area. As stated in the DDR/DEIS and FDR/FEIS, it was determined that rural clusters of five residences or fewer within the study area would not be considered reasonable under the NYSDOT Noise Policy. Please refer to **Section 6-4-6** of this DDR/DEIS and FDR/FEIS for additional information on the noise analysis.
- C 7-110: Increase the height of noise walls at the future interchange of I-81 and Northern Boulevard (Interchange 8 on I-481). Without a higher wall, there is little benefit to the nearby residences that experience heavy noise from the highway traffic.
- R 7-110: The existing wooden noise barriers in this area were assessed to optimize their performance and bring them up to current standards. The replacement barriers (Wood 1&2), as currently proposed, would be extended and are generally taller than the existing wooden barrier. These existing wooden noise barriers were assessed to optimize their performance and bring them up to current standards. Modeled noise levels are generally 1-2 dBA lower with the new barrier height configuration.

- C 7-111: Noise was improperly measured for the I-81/I-481 northern interchange. Measurements were conducted behind existing barriers or in locations with less traffic than other sections of the interchange. The area experiences noise from pass-by traffic as well as accelerating and decelerating trucks. There interchange must be completely surrounded by noise walls.
- R 7-111: Most field noise measurements were collected close to the noise source; however, some were farther from the noise source, and two were behind existing noise barriers. The diversity of the field noise measurement locations allowed for validation of the traffic noise model. Since some of the existing noise barriers will be replaced, it was important to collect field noise measurements behind the noise barriers to indicate whether the model was working properly in those areas. The quantitative traffic noise analysis for this project included the area of the I-81/I-481 northern interchange. Under the current design, noise barriers are proposed on all four quadrants of the northern interchange between the majority of the residences and the highway. Noise Barriers 1, 3B, Wood 1&2/4A, and Wood 3 are in this area. Please refer to **Section 6-4-6** of the DDR/DEIS and FDR/FEIS for additional information on the noise analysis.
- C 7-112: Please provide more details on the planned reconstruction of the noise walls near Kenlaren Circle and Brigadier Drive, which are currently wood barriers.
- R 7-112: The replacement barriers will be concrete with lighter materials to be used on the bridges. Aesthetic design of the noise barriers would be developed by a team of landscape architects during final design and in coordination with Project stakeholders and the Urban Design Technical Advisory Panel (UDTAP), which includes landscape architects, architects, and a city representative. As part of the I-81 Viaduct Project, NYSDOT would replace three existing wooden noise barriers near the existing I-81 and I-481 northern interchange. Most of the replacement noise barriers would be constructed in the same locations as the existing barriers. Based on noise analysis, NYSDOT plans to extend the length of Noise Barriers 4A and Wood 1 & 2 to the north to provide additional noise abatement to neighboring properties. The proposed replacement barriers would range from 8 to 14 feet in height. During final design, the heights and widths of the recommended noise barriers would be refined. Please refer to **Section 6-4-6** of the DDR/DEIS and FDR/FEIS for additional information on the noise analysis.
- C 7-113: Please consider noise abatement along I-690 near Mission Landing and West Street.
- R 7-113: The noise study modeled noise levels in this area. It was determined that required noise reductions from barriers were not feasible in many areas of the city due to background noise levels from local streets. In areas where the background noise level would allow for appropriate noise reductions, abatement analysis was performed to identify appropriate locations for noise barriers. Noise Abatement Study Areas 20, 21, 22, and 23 included this area. Noise barriers in these areas were found to be feasible but not reasonable as barrier construction would require major rehabilitation of existing I-690 bridges, including bridge deck and parapet wall replacement.

- C 7-114: The Community Grid Alternative will increase noise near Interchange 10 on I-690.
- R 7-114: For the most part, average peak-hour noise levels near I-690 Exit 10 at Geddes Street are expected to increase from existing levels by approximately 0-1 dBA for the Community Grid Alternative and 1-2 dBA for the Viaduct Alternative. In accordance with FHWA's "Highway Traffic Noise Analysis and Abatement Policy and Guidance," a noise level change of 3 dBA or less is generally imperceptible to the human ear; therefore, the change in average peak-hour noise levels is not expected to be noticeable in this area. While the average peak-hour increase in noise levels may not be noticeable, noise modeling for both build alternatives predicted FHWA Noise Abatement Criteria (NAC) impacts near Exit 10 at Geddes Street; therefore, noise abatement was considered for this area under Noise Abatement Study Areas 20, 21, 22, and 23. Noise barriers in these areas were found to be feasible but not reasonable as barrier construction would require major rehabilitation of existing I-690 bridges, including bridge deck and parapet wall replacement. For additional details on the noise abatement analysis for the I-690 Exit 10 area, see the information on Barriers 20, 21, 22, and 23 in **Sections 6-4-6.4.5** and **6-4-6.5.5** of the DDR/DEIS and FDR/FEIS.
- C 7-115: Increased traffic volume on I-690 will also lead to increased noise for houses and other properties along Burnet Avenue and neighboring streets. Provide noise barriers placed along the northern (and potentially southern side) of I-690 between Catherine Street and Lodi Street.
- R 7-115: As indicated in the DDR/DEIS and FDR/FEIS, noise abatement analysis was performed along the length of I-690 within Noise Abatement Study Areas 13, 20, 21, 22, and 23. Noise barriers were recommended in areas of I-690 that met the feasibility and reasonableness thresholds identified within the State's Noise Policy. Noise Barriers 13C (Partial), 13D, 13E, 13F, and 13H met the feasibility and reasonableness thresholds and are recommended along I-690. See **Section 6-4-6** of the DDR/DEIS and FDR/FEIS for further information on the noise study.

7-12 NATURAL RESOURCES

- C 7-116: NYSDOT must consider measures to prevent wildlife mortality. These could include measures that allow wildlife to cross the highway corridor safely or walls to prevent them from crossing the highway.
- R 7-116: In accordance with NYSDOT Bridge Manual, inclusion of wildlife passage may be considered during final design of new bridges. If during final design wildlife crossing concerns are identified, consideration of how best to accommodate those species within existing /proposed structures will be coordinated with environmental resource agencies.
- In addition, new bridges and culverts would be designed to meet New York State Department of Environmental Conservation (NYSDEC) stream crossing standards to allow for natural conditions that do not restrict the movement of fish and wildlife through the stream system.
- C 7-117: The rerouting of traffic to I-481 will have a devastating effect on Clark Reservation.

- R 7-117: Clark Reservation is on the south side of the I-481 South Study Area and is beyond the study area and would not be impacted by the Project. Because of its proximity to I-481 and its immediate border with a rail corridor, this area is chronically disturbed by highway and rail noise, and any red-tailed hawks, turkey vultures, or other birds inhabiting this wetland are tolerant of, and habituated to, high levels of disturbance. Construction of the Project would not have the potential to substantially increase noise or other disturbances to wildlife in this area above existing conditions.
- C 7-118: Consider the aesthetics of proposed stormwater management systems and the effects of stormwater runoff on water resources.
- R 7-118: Water resources and wetlands effects are described in **Section 6-4-7** of the DDR/DEIS and FDR/FEIS for both build alternatives. NYSDOT has been coordinating with the U.S. Army Corps of Engineers (USACE) and NYSDEC on possible wetland and stream mitigation options under the Community Grid Alternative. A conceptual mitigation plan involving a combination of Mud Creek channel enhancements in the I-481 North Study Area for the Community Grid Alternative has been accepted by USACE and NYSDEC. Additional mitigation/enhancement proposals for State- and federally regulated surface waters (i.e., Mud Creek, Ley Creek, and Onondaga Creek) include, to the extent practicable, establishing (or enhancing) a buffer of native species planted between Mud Creek channel and the right-of-way/edge of pavement. The buffer would slow and absorb stormwater runoff, support bank stability, and create and enhance habitat. Within Onondaga Creek in the Central Study Area, the effect of the two new stormwater trunk line outfalls would be minimized by the creation of energy dissipaters at the outfalls to reduce the potential for erosion.
- The Project would incorporate stormwater BMPs and green infrastructure such as infiltration basins, pervious pavements, vegetative buffers, and other green infrastructure practices that promote ground infiltration. These would be further refined as design progresses (see **Section 6-4-7 and Chapter 5** for further details). NYSDOT would consider the aesthetics of BMPs during final design.
- C 7-119: Water infrastructure is critical and must be replaced to ensure the sustainability of our community.
- R 7-119: The comment is outside the scope of the I-81 Viaduct Project.
- C 7-120: Add trees to I-481 between Northern Boulevard and Kirkville Road to prevent heavy winds that causes blowing snow and snow drifts in winter.
- R 7-120: The comment is outside the scope of the I-81 Viaduct Project.
- C 7-121: There are discrepancies and errors in the water resources and ecological chapters within and directly downhill to the west of the Project limits within the I-481 South Study Area. In **Section 6-4-7**, the DEIS states, and **Figure 6-4-7-50** shows, that City Line Brook (Tributary #4 of the Onondaga Creek referred to as CLB) is completely "underground" or "piped or diverted

underground" in the Project limits. CLB is aboveground within the study area except for a small segment that connects to Onondaga Creek (see comment letter attachments). The stream is above ground until Slayton Avenue. Other valley streams such as Cold Brook south of Seneca Turnpike are also above ground, contrary to the graphic and DEIS language. CLG emanates from bedrock-sourced springs through carbonate rock fractures to the east and south directly below the Project limits in the I-481 South Study Area. Unpipied stormwater drainage from I-81 and I-481 percolates through the bedrock via contributing springs of CLB and its tributaries.

R 7-121: The documentation and mapping of City Line Brook, its springs, and the sinkhole in the vicinity of the I-481 South Study Area was reviewed and was used to update the existing conditions of City Line Brook in **Section 6-4-7** of the FDR/FEIS.

C 7-122: The main City Line Brook (Tributary #4 of the Onondaga Creek referred to as CLB) springs are located west of the Loretto property in an area known as the Glen. There may be additional springs within the Glen, and there are also springs located along the Valley wall to the south associated with the southern tributary of CLB. That analysis found that CLB is unique in the volume and rate of tufa deposition compared to other Onondaga Valley springs.

The DDR/DEIS speculates that CLB has a very small watershed, but the watershed includes travel through deep rock fractures, so that is likely incorrect. The DDR/DEIS also shows overland flow from the southeast (**Figure 6-4-7-50**), but historical photos and mapping do not show that.

The DDR/DEIS discounts that some potential communities such as salt pond, maple-basswood rich mesic forest, calcareous talus slope woodland, and limestone woodland may exist in the study area; the NYSDOT needs to investigate these environments associated with CLB and its tributaries.

R 7-122: The mapping shown in **Figure 6-4-7-50** is from the Nation Hydrology Dataset, available from the U.S. Geological Survey (USGS). This dataset is at the scale of 1:24,000, and appears to have some inaccuracies; in addition to the observed inaccuracies, USGS has recently developed a markup app to allow users to suggest such corrections (<https://www.usgs.gov/core-science-systems/ngp/national-hydrography/tools#Markup>).

C 7-123: There should be recognition in the EIS that there is a sinkhole associated with City Line Brook under southbound I-81; historic aerials show a karst, pitted landscape and a large sinkhole uphill, southeast of the Glen springs. The DDR/DEIS notes this feature as a gravel pit. NYSDOT subsequently built a culvert over the sinkhole area, and existing topographic maps related to the construction of the Cunningham Building also show portions of the sinkhole feature.

R 7-123: A description of the sink hole and its connection with City Line Brook has been added to **Section 6-4-7** of the FDR/FEIS.

- C 7-124: Associated Glacial Ravine - the ground watershed of this brook and its water volumes are unknown and also result in periodic flooding; yards in this area are perpetually saturated with seeps. The DDR/DEIS does not recognize the potential existence of the Glen ecological classification as a “rich sloping fen” or similar calcareous fen (which may have once supported Hart’s Tongue Fern) and the ravine’s ecological classification as “calcareous talus slope woodland.” This type of fen has high importance and is classified as S1 in state rank for community rarity and vulnerability. The adjacent area is bordered by exposed rock cliffs, which may provide bat habitat.
- R 7-124: The study area for ecological communities is shown in **Appendix J-2, Figure J-2-4**. The study area for ecological communities is the area within the Project limits and up to 100 feet from the Project limits. The Glen area, noted on Attachment 1 of the commenters letter (see **Appendix M-6**), is located west of the study area. For these reasons, it was not included in the ecological community’s assessment.
- C 7-125: Due to the features in the I-481 South Study Area, stormwater in the uphill area will be passed through the fractures and will carry runoff into the neighborhood. Therefore, construction practices and designed stormwater conveyances need to be adjusted. NYSDOT stormwater management in the CLB watershed must address impacts to the Valley.
- R 7-125: Additional details regarding the stormwater interactions with the sinkhole have been added to **Section 6-4-7** of the FDR/FEIS. As noted in **Chapter 5**, stormwater practices for the area would not be infiltrating practices.
- C 7-126: NYSDOT should use deeper borings in the I-481 South Study Area in order to determine the CLB watershed and bedrock characteristics as well as provide access to CLB researchers access for monitoring.
- R 7-126: NYSDOT would conduct geotechnical borings in the I-481 South Study Area during final design. Borings would be conducted to the appropriate depths based on geological conditions at individual sites. See **Section 5.6.3** of the DDR/DEIS and FDR/FEIS for further discussion with respect to geotechnical and stormwater analyses for the Community Grid Alternative.
- C 7-127: Construction to the 81/481 interchange area may impact the bedrock and should be limited/mitigated. Stormwater flows over specific fractures and construction disturbance may change the way water flows through the bedrock and impact downhill neighborhoods, CLB, or its tributaries and springs. Stormwater conveyance along I-81 in the area of karst topography should be lined and their flows piped; the practice of “losing water” to bedrock and the neighborhoods should be mitigated.
- R 7-127: There would be no increase in impervious area within this area, and therefore, no increase in stormwater discharge. As noted in **Chapter 5** of the DDR/DEIS and FDR/FEIS, stormwater practices for the area would not be infiltrating practices.

7-13 FARMLANDS

- C 7-128: Based on the information provided in the DDR/DEIS, the New York State Department of Agriculture and Markets finds that the affected land does not appear to be located within a county adopted, State certified, agricultural district.
- R 7-128: Comment noted.

7-14 CONSTRUCTION¹

- C 7-129: Construction of the Project will result in impacts to residents living near the work zones. NYSDOT must address concerns regarding construction impacts, including traffic, air quality, exposure to hazardous materials (e.g., lead and asbestos), noise, and debris, particularly in proximity to the existing viaduct and within Downtown Syracuse; provide additional details on protection of pedestrians and workers during construction, as well as mitigation during construction; and share more details regarding plans to address noise, air quality, and safe living conditions for residents. NYSDOT should work closely with the city on utility infrastructure (in particular, water, sewer, and road infrastructure on detour routes and routes adjacent to the Project), public safety (police, fire, and emergency response), and public information because of construction.
- R 7-129: FHWA and NYSDOT are committed to mitigating potential adverse effects that would occur because of the Project's construction activities. The DDR/DEIS and FDR/FEIS provides an assessment of potential construction effects for each social, economic, and environmental subject area. A subsection entitled "Construction Effects" is provided in **Chapter 5** and at the end of each subject area section within **Chapter 6** for each alternative. **Table 4-7** provides specific commitments to avoid, minimize, or otherwise mitigate adverse effects that could result from the Project's construction. **Table 4-7** includes specific requirements to mitigate adverse effects to air quality and noise, as well as measures to manage traffic and access to businesses and residences and public safety. It also includes requirements for the removal, transport, and disposal of contaminated materials, in accordance with Federal and State regulations. NYSDOT would coordinate with the City of Syracuse, as needed, regarding utility relocations and emergency access during construction. NYSDOT would also establish a public outreach program and point of contact to facilitate the sharing of information and collection of feedback during the Project's construction.

Sections 5.5.1 and 5.6.1 of the DDR/DEIS and FDR/FEIS discuss traffic conditions during construction for the Viaduct Alternative and Community Grid Alternative. For both build alternatives, the identified worst-case construction phase was evaluated to ensure that the alternative could be built without unmitigable adverse effects on traffic operations.

¹ Certain construction comments were specific to an environmental topic and have been addressed above. The following are more general comments about potential adverse effects during construction.

- C 7-130: Construction would adversely affect businesses in Downtown Syracuse due to reduced patronage.
- R 7-130: **Section 6-3-2** and **Appendix D-2** examine the effects of construction on local and regional economies, and it does not conclude that construction would result in substantial loss of business. **Section 4.5** of the DDR/DEIS and FDR/FEIS describes the measures that may be implemented to minimize disruptions to the traveling public and the surrounding communities during construction. As stated, these measures would include providing information and directional signage for detours, preparing a communication and public outreach plan to be implemented throughout the construction period, establishing a project outreach center to disseminate construction information, keeping the local businesses and the public informed throughout construction, and a Traffic Management Plan to address parking during construction.
- C 7-131: There must be significant economic mitigation and government funding for affected residents and stakeholders to support the creation and development of neighborhood businesses to provide for a restored livable community with superior market condition appeal.
- R 7-131: Establishing a community benefit enhancements/mitigation fund is beyond the scope of this Project. The Project is being partially funded by FHWA; therefore, expenditures are restricted to transportation purposes. Mitigation measures are confined to the Project Area. Measures proposed for mitigation are described under each relevant resource category in **Chapter 6**.
- Section 4.5** of the DDR/DEIS and FDR/FEIS describes the measures that may be implemented to minimize disruptions to the traveling public and the surrounding communities during construction. As stated, these measures would include providing information and directional signage for detours, preparing a communication and public outreach plan to be implemented throughout the construction period, establishing a project outreach center to disseminate construction information, keeping the local businesses and the public informed throughout construction, and a Traffic Management Plan to address parking during construction.
- Potential effects to businesses are discussed in **Section 6-3-2**. As described in **Section 6-3-1**, both alternatives require building acquisitions although the Viaduct Alternative would result in more property acquisition than the Community Grid Alternative. **Sections 6 3 1.3.5** and **6-3-1.4.4** describe the steps that NYSDOT would take to acquire property, including communication with property owners and tenants. Measures to mitigate the effects of property acquisition under the Viaduct Alternative and Community Grid Alternative are also discussed in these sections.
- C 7-132: Construction of the Project will impact access to hotels and convention and tourism destinations. There must be a fund or promote the industry and to educate drivers on how to reach our facilities.

R 7-132: Aid to the local Convention and Visitors Bureau is not directly related to transportation and thus falls outside NYSDOT's authority. NYSDOT will provide regular and ongoing updates on construction activities and detours due to roadway closures and/or restrictions. NYSDOT will ensure that access to businesses in the Project Area is always maintained. NYSDOT will also maintain an outreach center through which individuals or groups can meet with NYSDOT representatives to discuss specific concerns during construction.

C 7-133: The Project should employ people within New York State, including as many local companies and as much local labor as possible, including minorities and women for construction. NYSDOT should also work with the community to prioritize creating employment opportunities for residents. NYSDOT should incorporate contract requirements for local hiring. Real-time monitoring performance is critical.

NYSDOT should convene stakeholders in the I-81 Viaduct Project to negotiate the terms and enforcement of the I-81 governing documents related to minority contracting and the hiring of workers on I-81. In addition, the group could assist with the recruitment and training of City residents to work on the I-81 Viaduct Project. If Project Labor Agreements or Requests for Proposals for the I-81 Viaduct Project are developed through a "business as usual" approach, under- and unemployed Syracuse residents that would be most impacted by this \$2 billion project would not benefit significantly from its ladders of opportunity.

The project should set specific hiring goals (as a percentage of expected project work hours) on several groups of potential hires: a) local residents already trained or currently in training programs b) disadvantaged workers--e.g., disabled, formerly incarcerated, single custodial parents, public assistance recipients, workers without HS or GED diplomas, the unhoused c) create a NYSDOT managed On-The-Job training program targeted at both local residents and traditionally disadvantaged workers.

R 7-133: In August 2021, NYSDOT began coordinating with local stakeholders, including the City of Syracuse, Urban Jobs Task Force, and Legal Services of CNY to establish a local hiring preference on the I-81 Viaduct Project. Topics of discussion at the local stakeholder meetings included available workforce, similar requirements on City of Syracuse projects, incentives to contractors, and a framework for providing employment opportunities to residents most affected by the current viaduct and the I-81 Viaduct Project. Meeting participants identified the need for an incentive-based hiring program that would encourage contractors on the Project to hire residents in some of the City of Syracuse's most disadvantaged neighborhoods. NYSDOT submitted an application for local hiring preference to FHWA for review in December 2021, which was approved in March 2022. The program will create a local hiring preference for the I-81 Viaduct Project, including an expansion of NYSDOT's On-the-Job Training program for the Project to increase access for individuals to seek careers in heavy highway construction. This would help give greater opportunity for individuals living near the Project and in the City of Syracuse to work directly on the Project.

NYSDOT has partnered with New York State Department of Labor (NYSDOL) to create Workforce Forward: Syracuse. This program and \$1 million in State funding would seek to

connect workers to training opportunities and to short-term and long-term infrastructure jobs in and around Syracuse. Workforce Forward would help place and train individuals seeking to work on the many ancillary jobs that would be created by the Project. The plan is to have NYSDOL in the local community connecting with people in the neighborhoods they live in and help them find the employment or training they would need to be successful.

NYSDOT also has established the WorkSmart NY program in partnership with the Syracuse Educational Opportunity Center, an affiliate of SUNY Morrisville Community College (SUNY EOC). This program is helping give those who want to work in infrastructure construction the basic skills to work on any job site. Through the WorkSmart NY program, NYSDOT will coordinate with existing community action agencies and initiatives such as CenterState CEO; Syracuse Build, led by the City of Syracuse; educational institutions; trade and industry representatives; and other key partners to create the WorkSmartNY Syracuse Build Collaborative (the Collaborative) for the FHWA Highway Construction Worker Partnership (HCWP) grant. The region's workforce development board, CNY Works, Inc., has participated in the planning and organization of this grant and a statement of commitment has been requested.

FHWA's HWCP grant provides funding to states to expand workforce development opportunities in local communities and increase the number of construction workers in the highway construction field through recruitment, assistance, training, and placement. The Collaborative believes that a successful program requires more than teaching an individual trade skills; it must provide supportive programs and services throughout the trainee/apprenticeship duration. The Collaborative has a long and successful track record of working with other agencies in underserved communities to secure funding for construction skills training, recruitment, and placement, and spearheading workforce development advocacy efforts. NYSDOT will leverage those skills, expertise, and resources to bring the partnership full circle by engaging local labor unions and industry representatives to provide actual employment opportunities to trained individuals.

NYSDOT has applied for additional HWCP grant funds to expand the WorkSmart NY program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program would grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship, a program to help get more people involved in local trades unions.

NYSDOT has recently secured Statewide Transportation Information and Coordination Center (STICC) funds to create a new, interactive video program to introduce and encourage high school students to pursue careers in heavy highway construction. The plan is to work directly with the Syracuse City School District and its P-Tech program to show students the opportunities they have in the building infrastructure field through first-person videos by students and individuals working on projects and to use the Project as a catalyst to create video content that students can explore to learn more about fields of interest. NYSDOT plans to monitor the local hiring metrics throughout the Project and would conduct regular meetings

with the WorkSmart NY Syracuse Build Collaborative to gauge the progress on hiring and where things need to be adjusted.

- C 7-134: NYSDOT must provide independent oversight to ensure the goals of the labor agreement are met, using an Independent Compliance Officer (ICO). This ICO should not only meticulously collect data on workforce hours and demographics, but it should regularly provide full disclosure of this workforce data to the public, including the Urban Jobs Task Force.
- R 7-134: NYSDOT is committed to utilizing a Compliance Officer to collect data on workforce hours and demographics. This information will be shared quarterly to track the goal attainment throughout the construction phases. With multiple construction contracts occurring simultaneously, the Compliance Officer will be a NYSDOT employee who has access to all the construction contract information.
- C 7-135: Please construct the new noise barriers on I-481 prior to other construction activities. This will help abate construction noise.
- R 7-135: The construction work including noise barriers on I-481 will be completed as part of the first contracts of the I-81 Viaduct Project. Contractors have not been retained at this stage of the project development process. Construction schedules including the construction of noise barriers will be developed once Contractors are selected.
- C 7-136: Implement the Rooney Rule for all open positions that are to be filled on day of notice of award of contract until completion with strong accountability measures to assure compliance with intent and requirements.
- R 7-136: Comment noted.
- C 7-137: We support the restatement and implementation of the past or improved federal regulation "Geographic-Based Hiring Preferences in Administering Federal Award" published on March 6, 2015 (80 FR12092)-Innovative Contracting (Local Labor Hire) (80 FR12557) and FHWA HUD Livability Local Hire Initiative (75 FR36467).
- R 7-137: Comment noted.
- C 7-138: NYSDOT must take appropriate actions to accommodate residents who would like to relocate to avoid conditions that may be hazardous to their physical or mental health, or their ability to continue to engage in essential functions. NYSDOT must offer market-rate buyouts, rent subsidies, and/or temporary relocation assistance for people who want to move. An easement reassessment must be conducted so that renters receive easement payments if they lose access and partial enjoyment of their homes during construction.
- R 7-138: The temporary relocation of residents during construction is not required for the Viaduct Alternative or the Community Grid Alternative. Under the Viaduct Alternative, 95 dwelling units

would be permanently displaced; the Community Grid Alternative would not displace residents. NYSDOT would carry out all property acquisitions in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act and New York State's Eminent Domain Procedure Law, which includes relocation assistance to owners and tenants of affected properties. **Sections 6-3-1.3.5** and **6-3-1.4.4** describe the steps that NYSDOT would take to acquire property, including communications with property owners and tenants.

- C 7-139: Please describe how debris will be removed, transported, and discarded.
- R 7-139: The disposal or recycling of materials would be determined as design advances. All transport and disposal of materials will comply with NYSDOT standard specifications, and NYSDOT will incorporate construction mitigation measures into contract documents. Refer to **Table 4-7** of the DDR/DEIS and FDR/FEIS for more information.
- C 7-140: Emergency vehicles will need to cross Almond Street during construction.
- R 7-140: NYSDOT will develop a maintenance and protection of traffic plan to manage traffic operations during construction. NYSDOT will maintain east-west routes across Almond Street. When an intersection must be closed, NYSDOT will establish a detour route. NYSDOT will coordinate with emergency management services to identify any changes in roadway operations near hospitals, fire stations, and police precincts during construction.
- C 7-141: The construction of the Community Grid Alternative will greatly impact Dr. King Elementary School. The children, who attend the school and likely live in the area, are already exposed to highly polluted air. The emissions from on-site construction and the diversion of existing I-81 traffic through the Martin Luther King, Jr. East area would only exacerbate the problem. Additionally, the noise from construction may be distracting to children in a learning environment. These effects will not be short term but will persist for the duration of the construction period.
- R 7-141: As described in **Chapter 4 (Table 4-7)** of the DDR/DEIS and FDR/FEIS, NYSDOT would require its contractors to comply with numerous measures to minimize or otherwise mitigate adverse effects on sensitive land uses/facilities, including schools, during construction. These measures include time-of-day restrictions for noise activities; temporary noise abatement measures, such as the use of shrouds or other noise curtains, acoustic fabric, soundproof housings, physical barriers and/or enclosures to reduce noise from loud equipment; requirements for vehicles and equipment to reduce noise; designated truck routes; and the implementation of a noise and vibration monitoring program. In the construction zone between MLK, Jr. East and Harrison Street, the contractor would be directed to use saw cutting methods and prohibit impact hammers during the demolition of existing structures when reasonable, and to use drilled foundations on all bridge piers and other support structures and prohibit pile driving methods.

Also, as described in **Chapter 3** of this FDR/FEIS, based on public input received during the DDR/DEIS public comment period, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East in the vicinity of Dr. King Elementary School as part of the Community Grid Alternative. By eliminating the roundabout in this location, the proposed transportation system (and associated construction activities) would be moved as far away as practicable from the school. The duration of construction in this area would also be reduced.

NYSDOT would continue to coordinate with the Syracuse City School District during construction. During final design, NYSDOT would consider implementing additional construction restrictions within the construction zone near Dr. King Elementary School, such as time and/or seasonal restrictions where appropriate. **Sections 6-2-1** and **6-2-3** of this FDR/FEIS have been revised to reflect this.

- C 7-142: NYSDOT must provide mitigation funds to relocate Dr. King School during construction. The school district does not have the funds to facilitate its relocation.
- R 7-142: NYSDOT did not identify a need to relocate the Dr. King Elementary School during construction.
- C 7-143: Construction of the Community Grid Alternative will cause severe impacts on I-481 and Interchange 3.
- R 7-143: NYSDOT will implement the I-481 improvements, including improvements at Interchange 3, prior to closing and demolishing the I-81 viaduct. NYSDOT will prepare a maintenance and protection of traffic plan and implement temporary improvements as needed to ensure reasonable traffic operations during construction.
- C 7-144: Please make sure improvements to I-481 and its interchanges are made before the existing I-81 is removed.
- R 7-144: NYSDOT would make the necessary improvements to I-481 before it is re-designated as I-81 and the existing viaduct is removed.
- C 7-145: Crouse Avenue is an important connection between Hawley Green and University Hill. Steps must be taken to mitigate impacts to neighborhood residents if this connectivity is temporarily severed. This could include funding additional shuttle buses between the neighborhood and Syracuse University.
- R 7-145: There is no plan to sever access along Crouse Avenue during construction. NYSDOT would prepare a maintenance and protection of traffic plan to provide adequate detour routes in the event of any temporary street closures. Refer to **Table 4-7** of the FDR/FEIS for a description of construction mitigation commitments.
- C 7-146: Remove the viaduct in a safe and fair way that has the least negative effect on the community.

- R 7-146: Comment noted.
- C 7-147: NYSDOT should remediate heavy metals from the soils underneath the current viaduct and surrounding area for at least a hundred feet.
- R 7-147: Any demolition work that is undertaken will follow all Federal and State regulations. Soil, air, building material testing, and personal monitoring will occur as required by the regulations. Disturbed soil resulting from the conversion of Almond Street to BL 81 will be excavated and disposed of in accordance with NYSDOT specifications.
- C 7-148: The Project should use stringent lead control practices when removing the painted structure, digging in the soil, and disposing of construction waste to avoid further exposing the local community to lead.
- R 7-148: **Section 6-4-9** of the DDR/DEIS and FDR/FEIS documents the potential to encounter lead-based paint during construction of the Project and NYSDOT's protocols to handle its removal, transport, and disposal. Disturbed soil resulting from the conversion of Almond Street to BL 81 will be excavated and disposed of in accordance with NYSDOT specifications. As detailed in **Table 4-7** of **Chapter 4** of the DDR/DEIS and FDR/FEIS, the NYSDOT has developed a robust set of construction mitigation measures and best practices for the Project, including requiring the Contractor to prepare a Lead Exposure Control Plan that includes practices and measures to be implemented to ensure the safety and health of employees who could be exposed to lead during construction. By extension, this plan would be developed to protect the general public.
- C 7-149: NYSDOT must consider the impacts of construction staging in Wilson Park.
- R 7-149: As documented in **Section 6-4-2** and **Chapter 7** of the DDR/DEIS and FDR/FEIS, the eastern edge of Wilson Park, the area closest to the existing I-81 viaduct, is within the existing NYSDOT right-of-way. A twenty-foot swath (0.12 acres) outside and adjacent to the right-of-way would be closed for less than one year during the construction period of the Community Grid Alternative to provide a safety buffer between the accessible portion of the park and the construction activities required to remove the viaduct. The inaccessible portion of the park would not be used for construction staging. NYSDOT would require that the closed portion of the park be properly fenced off from the rest of the park and kept clean and safe.
- C 7-150: Describe the construction phasing and staging for the Community Grid Alternative.
- R 7-150: Refer to **Section 4.4** of the DDR/DEIS and FDR/FEIS for a detailed description of the construction phases, anticipated schedule, and the means and methods to construct the Community Grid Alternative.
- C 7-151: There must be a program for students to learn about the construction industry while the project is ongoing.

- R 7-151: A Project outreach center would be open during construction phases to provide information to the public including students, and NYSDOT is open to engagement with students regarding the construction industry.
- C 7-152: Park-and-ride facilities should be provided during the construction phase.
- R 7-152: Temporary park-and-ride locations would be provided during construction as described in **Table 4-7**.
- C 7-153: During construction, NYSDOT should provide access to health services/mental health resources. NYSDOT should develop an on-site health clinic at Toomey Abbot Towers staffed by experts to provide prompt virtual and in person care (with services including primary care, pulmonary care, audiology services, and occupational health). NYSDOT must ensure that access to Upstate and other health related services remain available and easily accessible during the project. NYSDOT should continue to monitor and assess residents' health (such as through an environmental health registry). NYSDOT should make available mental health resources in on-site health clinic and conduct appropriate outreach to connect people to these services.
- R 7-153: Providing health services/mental health resources is beyond the scope of the Project. NYSDOT would maintain access to existing healthcare facilities during construction.
- C 7-154: Any traffic noise, construction noise, or vibrations that can penetrate the Charter Communications building would impact Spectrum News on air presence, especially any pounding of steel support structure into the ground or construction equipment with loud beeping enunciators.
- Given the nature and necessity of reporting the news, does the state have plans to mitigate noise and vibrations during construction and impacts of highway traffic noise once construction is completed?
 - What air pollution/dust mitigation measures will be in place during construction?
 - Construction dust would have an impact on the buildings HVAC systems and rooftop air filter, requiring constant filter changes. Any blockage could cause equipment failure affecting our local news operation and taking out our channel to customers. An operational HVAC system is mandatory to keep Spectrum News technical equipment operating.
 - Would NYSDOT create a construction schedule to accommodate our news and other studio productions to mitigate noise and vibration impacts?
 - The Spectrum News editorial and technical staff begin their day prepping the Morning Show at approximately 4:45 AM. Studio production for the Morning Show begins at 5:30 AM and concludes at 9 AM. Studio Anchor Segments are often updated for repeated telecast between the hours of 9 AM and noon. Between the hours of noon and 5:30 PM there is no studio production.
 - At 5:30 PM studio production resumes for evening Sports programs.

R 7-154: Construction noise is anticipated for both Project alternatives. However, given the construction of a ramp access through the Charter Communications property under the Community Grid Alternative, construction noise levels are expected to be higher under the Community Grid Alternative. NYSDOT has committed to the measures to minimize community impacts related to noise and vibration that are laid out in **Table 4-7** of the FDR/FEIS. Measures identified include implementation of a noise and vibration monitoring program during construction and coordination of work operations to coincide with time periods that would least affect neighboring residences and businesses. Additional measures to minimize community impacts related to noise and vibration can be found in **Table 4-7** of the FDR/FEIS.

As listed in **Table 4-7 of Chapter 4, Construction Means and Methods**, for on-site fugitive dust emissions from construction activities, NYSDOT would require the Contractor to comply with its standard construction practices to reduce and mitigate the effects of these activities on air quality at nearby sensitive receptor locations. These practices would include monitoring air quality during construction, the use of Ultra Low Sulfur Diesel fuel, development and implementation of a dust control plan, the use of emission controls such as diesel particulate filters, and vehicle idling restrictions to the extent practicable. The plan could include measures such as requiring trucks that are hauling loose material to be equipped with tight-fitting tailgates and have their loads securely covered prior to leaving the Project site and the use of water sprays for demolition, excavation, and transfer of soils to ensure that materials would be dampened as necessary to avoid the suspension of dust into the air. These measures would reduce PM emissions from dust-generating construction activities. Diesel powered engines would be located away from building air conditioners and windows, and exposure of sensitive receptors within 50 feet of diesel exhaust, in terms of both concentration and time, would be minimized.

NYSDOT has not retained a Contractor for construction of the highway adjacent to the Charter Communication building. As design advances, NYSDOT will work with the Contractor and Spectrum to avoid or minimize effects to its broadcasts.

7-15 SECTION 4(f) EVALUATION

C 7-155: The U.S Department of the Interior concurs with the FHWA determination that the Community Grid Alternative (Preferred Alternative) would result in the de minimis impact under Section 4(f) on 13 identified Section 4(f) historic resources in the project area.

R 7-155: Comment noted.

C 7-156: With respect to Wilson Park, the U.S Department of the Interior has no objection to the Section 4(f) approval for a temporary occupancy, if concurrence letters from City of Syracuse Department of Parks, Recreation, and Youth Programs and the Syracuse Housing Authority, be included in the final Section 4(f) Evaluation.

R 7-156: On November 22, 2021, NYSDOT requested formal concurrence from the officials with jurisdiction over Wilson Park (i.e., the City of Syracuse and its Parks Department and

Syracuse Housing Authority), and each submitted letters of concurrence on January 31, 2022 and February 2, 2022, respectively. Please refer to **Appendix N** for copies of these letters.

8 PUBLIC OUTREACH

8-1 GENERAL

- C 8-1: The study has been underway for a long time. It is time to decide and complete the project.
- R 8-1: FHWA and NYSDOT continue to comply with the procedural requirements of NEPA. In the DDR/DEIS and FDR/FEIS, NYSDOT identified the Community Grid Alternative as the Preferred Alternative for the I-81 Viaduct Project. FHWA will make its final decision and selection of the Preferred Alternative in the Record of Decision.
- C 8-2: There has been considerable public outreach. Please continue to keep the public informed throughout the project's design and construction.
- R 8-2: NYSDOT will continue public engagement throughout the design and construction of the I-81 Viaduct Project.
- C 8-3: There must be meaningful public input in the selection of the Preferred Alternative. People have raised many concerns about this project, and NYSDOT has failed to address them. The public must vote on the alternative that moves forward or a public referendum must be held.
- R 8-3: NYSDOT and FHWA have carefully considered substantive comments and feedback received as part of its extensive public outreach program. The public outreach, as well as the evaluation of alternatives and examination of environmental effects, is being carried out in accordance with NEPA, which establishes procedures for selecting a Preferred Alternative. The Preferred Alternative for this Project has been identified based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the Project alternatives; agency and public input; and national, State, and local environmental protection goals (see **Chapter 8, Summary of Alternatives** of the DDR/DEIS and FDR/FEIS). FHWA will make the final decision on the selection of the Preferred Alternative in the ROD. A public referendum or vote would not be in accordance with the NEPA process.
- C 8-4: NYSDOT must consider the public concerns in making its decisions. It cannot put the economic or business interests over and above the needs of the public.
- R 8-4: Comment noted.
- C 8-5: There must be more outreach to and consideration of viewpoints from the suburbs with respect to the Project.
- R 8-5: NYSDOT conducted numerous public meetings in locations outside the City of Syracuse from 2013 to publication of the DDR/DEIS (refer to **Appendix M-1**). The large public meetings (i.e., scoping meetings and open houses) were held in Downtown Syracuse and were advertised

throughout the metropolitan region. Section 9-3.1 describes the public meetings and open houses conducted to date.

Following publication of the DDR/DEIS, NYSDOT and FHWA held two public hearings, one virtual and one in person at the Oncenter, to solicit public comments and to allow the public to discuss concerns and questions with NYSDOT staff. The Project website included a link to a virtual outreach center with the same display boards and other materials that were available at the in-person hearing. NYSDOT and FHWA also held nine individual neighborhood/community meetings, five of which were in areas outside of the city, to provide additional opportunities for communities to obtain information on the Project and provide feedback. In addition, the DDR/DEIS and the FDR/FEIS provide a full analysis of potential impacts of the Community Grid Alternative.

- C 8-6: NYSDOT should promote and facilitate active participation by neighborhood groups and the public throughout the design and construction phases.
- R 8-6: NYSDOT has conducted extensive outreach for the Project, as described in **Chapter 9, Agency Coordination and Public Outreach** of the DDR/DEIS and FDR/FEIS. Meetings are listed in **Appendix M-1**. Public meetings have been held in numerous neighborhoods within Syracuse, including locations throughout the city and near the existing viaduct that would be removed during construction, as well as areas outside the City, to inform the public and ensure opportunities for feedback. Meetings were advertised in local newspapers as well as in flyers in various public gathering places. NYSDOT staff have been present at these meetings, and NYSDOT and FHWA have considered substantive comments and feedback received as part of the public outreach program. Such comments and feedback have informed the subsequent refinement of the Project. NYSDOT will continue public engagement throughout the design and construction of the I-81 Viaduct Project. During construction, NYSDOT would establish a hotline and project outreach center, as well as other communication tools, to disseminate information and to obtain input from the public.
- C 8-7: Government officials have not been responsive to community comments.
- R 8-7: All comments received on the Project have been carefully considered and addressed, as applicable. Responses to comments are provided in this document, **Appendix M-5**, and modifications have been incorporated into the Project design based on community feedback, where appropriate.

8-2 STAKEHOLDER OUTREACH

- C 8-8: There should be outreach to the Southside neighborhood to understand and address concerns related to the Community Grid Alternative.
- R 8-8: Numerous meetings have been held in the Southside neighborhood and with Southside representatives (refer to **Appendix M-1**), and meetings will continue as the design is progressed. As part of the public review period for the DDR/DEIS, NYSDOT and FHWA held

two large public meetings, one virtually and one in person at the Oncenter, to solicit public comments and to allow the public to discuss concerns and questions with NYSDOT staff. The Project website included a link to a virtual outreach center with the same display boards and other materials that were available at the in-person hearing. NYSDOT and FHWA also held individual neighborhood meetings throughout the city and surrounding communities to provide additional opportunities for community participation. In addition, the DDR/DEIS and the FDR/FEIS provide a full analysis of potential impacts of the Community Grid Alternative.

C 8-9: The impacts of the construction of the highway on the Onondaga Nation must be addressed. There has not been one meeting arranged to hear the voices of the people of the Onondaga Nation, even though a request for a town hall meeting was sent over a year ago.

R 8-9: The Onondaga Nation has participated in the environmental review and Section 106 of the National Historic Preservation Act processes for the I-81 Viaduct Project. As documented in **Chapter 9** of the DDR/DEIS and FDR/FEIS, the Nation is a Participating Agency and a Section 106 Consulting Party. The Nation has attended Participating Agency and Section 106 Consulting Party meetings, and there have been multiple one-on-one meetings among representatives of the Nation and FHWA and NYSDOT.

As documented in **Chapter 9** of the DDR/DEIS and FDR/FEIS, NYSDOT has conducted extensive outreach throughout the preparation of the EIS, including multiple open houses, neighborhood meetings, and community meetings held for the Project and NYSDOT participation at public festivals and similar events. NYSDOT will continue to hold meetings and provide opportunities for public involvement prior to and during construction of the Project.

C 8-10: NYSDOT must consult the community about the plans for I-81 near Dr. King Elementary School. It is not enough to speak only with school leaders. They do not fully represent the interests of the community.

R 8-10: FHWA and NYSDOT have held multiple stakeholder and community meetings in the Southside area, including at the Dr. King Elementary School. FHWA and NYSDOT have carefully considered the input that was provided.

C 8-11: The public needs to be kept informed; the public must be able to provide continuing input to the project leaders; and the public deserves responses to the ideas we will continue to submit. Please be sure the Final EIS addresses public participation in a specific manner outlining how NYSDOT will seek public input and address public input provided.

A suggestion to meet this objective is to form technical advisory and citizen advisory groups to address questions during design and construction such as portions of the project to be contracted, construction staging area plans, dust and noise control methods and procedures, street design details, and air quality controls associated with construction. Please consider securing experienced public participation specialists from outside NYSDOT as warranted to assure this objective will be effectively met.

- R 8-11: Advisory panels will be formed as needed. Prior to the start of construction, NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan with NYSDOT's review and approval, the specifics cannot be stated at this time. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation. At a minimum, the plan would include establishment of a centrally located, on-site project outreach office; establishment of a telephone hotline; a website with information about street closures, detours, nighttime construction activities, and locations and times of particularly noisy construction activities; and a specific communication schedule and procedures for providing construction status updates and other construction-related information to the general public (refer to **Section 4.5.2** of the FDR/FEIS for additional details).

8-3 DDR/DEIS PUBLIC REVIEW

- C 8-12: The DEIS public review period should be extended.
- R 8-12: On September 3, 2021, FHWA and NYSDOT announced a 30-day extension of the public comment period and changed the close of the comment period from September 14, 2021 to October 14, 2021.
- C 8-13: The afternoon hearing time does not accommodate working people. NYSDOT must consider virtual comments since not all people could attend in person.
- R 8-13: NYSDOT held two public hearings. Sessions of the virtual hearing were held at 11:00 AM and 5:00 PM on August 17. An in-person hearing on August 18 included an open house from 3:30 PM to 8:30 PM and oral testimony taken after the presentations at 4:00 and 6:00 pm. Stenographers were present to record testimony at the hearing and to record comments given to them one-on-one without an audience. The Project website included a link to a virtual outreach center with the same display boards and other materials that were available at the in-person hearing. Following the public hearings, NYSDOT and FHWA held nine individual neighborhood/community meetings from 6:00 PM to 8:00 PM, with a stenographer to record one-on-one comments dictated to them privately. NYSDOT also accepted comments through its on-line comment form and by e-mail, voicemail, and U.S. mail. NYSDOT also made comment forms available at the in-person public hearing and its neighborhood/community meetings held throughout the Project Area. NYSDOT has reviewed and considered all the substantive comments that it received.
- C 8-14: The neighborhood meetings conducted for the Project were useful, but they should not replace traditional hearings where both officials and the public can give statements and the community can get a sense of what people are saying. Syracuse United Neighbors (SUN) has extensive experience public meetings and would like to work with NYSDOT and local groups to improve public outreach meetings.

- R 8-14: Public hearings were held for the DDR/DEIS in addition to the neighborhood/community meetings (see response to **Comment 8-13** above).
- C 8-15: The neighborhood meetings after publication of the DDR/DEIS should have included a location in DeWitt.
- R 8-15: In addition to virtual and in-person public hearings in August 2021, NYSDOT subsequently held nine meetings in neighborhoods and communities throughout the City of Syracuse and adjacent suburbs. A neighborhood meeting was held at the Mott Road Elementary School in Fayetteville, NY on September 8, 2021, which is about two miles from the Town of DeWitt boundary and was intended to be convenient for residents of DeWitt.
- C 8-16: The public meeting staff were not helpful. They could only speak to the content of the boards where they were posted.
- R 8-16: Boards were staffed with NYSDOT and consultant team personnel based on their expertise. Staff were directed to answer questions when possible or to identify other experts who could assist.
- C 8-17: The DDR/DEIS is too technical and should be simplified for the general public.
- R 8-17: The DDR/DEIS complies with FHWA and NYSDOT guidance and requirements. NYSDOT prepared supplemental materials such as a project newsletter, information boards, a virtual project outreach center, videos, and a presentation to help highlight critical information more succinctly with less technical detail. An Executive Summary was included at the beginning of the DDR/DEIS and this FDR/FEIS.

8-4 OTHER

- C 8-18: NYSDOT should contact the Florida DOT (FDOT) to discuss the reconstruction of I-4 in Orlando, Florida, which bisects downtown Orlando. People do not complain about I-4 dividing the city, and NYSDOT should ask FDOT why the expansion of I-4 helps Orlando and the surrounding communities and does not divide the city. Syracuse Mayor Ben Walsh could talk to Orlando Mayor Buddy Dyer, and Onondaga County Executive Ryan McMahon could talk to his counterpart in Florida, Orange County Mayor Jerry Demings.
- R 8-18: The Community Grid Alternative provides a transportation solution that maintains the highway, as BL 81, through Syracuse. This concept allows for high-speed traffic to operate at Interstate speeds north and south of the downtown area. The grid section in Downtown, which operates at 30 mph, is a little over a mile long and begins near Van Buren Street and ends near I-690. Those choosing not to take BL 81 can use the re-routed I-81 around the City of Syracuse.
- C 8-19: CHA and the Central New York Regional Development Board have been awarded a grant from New York State Energy Research and Development Authority (NYSERDA) to study the feasibility of a community heat pump system in downtown Syracuse. This system would

recover heat from clean water that is discharged from the outfall of the Metro Syracuse Wastewater Treatment Plant to provide low-carbon energy services to buildings in the Inner Harbor, Downtown, and University Hill neighborhoods. A significant portion of the cost of district energy infrastructure in urban areas, such as the community heat pump system being studied for downtown Syracuse, is the cost of excavation, utility coordination, backfill, and hardscape restoration. Coordination of work involving streets that are planned to be excavated for the proposed Community Grid network would allow for a considerable reduction in capital costs for a district energy system. Please consider coordinating and co-locating additional utilities with the downtown Syracuse community heat pump system to minimize disruption and reduce the cost of installation.

- R 8-19: NYSDOT will coordinate any proposed excavation work associated with the Community Grid Alternative with CNY RPDB and NYSERDA to identify highway overlap with the feasibility study for a new community heat pump system in downtown Syracuse. **Appendix A-1** of the DDR/DEIS and FDR/FEIS includes areas of proposed excavation work with associated construction limits in downtown Syracuse. NYSDOT will have an improved level of understanding of the necessary excavation work on the Project during the final design phase.

9 LETTERS FROM ORGANIZATIONS AND AGENCIES

9-1 CITY OF SYRACUSE

- C 9-1: The City greatly appreciates the thorough process under which NYSDOT and FHWA have considered this project and the community outreach and engagement and public input that has occurred over many years. The Community Grid is the right alternative for Syracuse, Central New York, and all of New York State. The City requests that further mitigation for the adverse environmental impacts associated with the Community Grid Alternative be included in the FEIS. Syracuse will benefit from the Community Grid Alternative, but only if adequate mitigation measures are provided by the NYSDOT in order to address impacts proceeding from the construction process and certain design elements of the Project.
- R 9-1: Comment noted.
- C 9-2: Those who live closest to the existing I-81 corridor have borne the biggest burden in the past, and their neighborhoods must be protected and invested in. For this reason, the proposed design and position of the roundabout at Martin Luther King School is unacceptable. We cannot allow expediency of transportation to put our children at risk for decades to come. NYSDOT must listen to the public's feedback and suggestions on this critical element of the Project and modify this design element in the FEIS.
- R 9-2: As stated in **Section 3.4.3** of this FDR/FEIS, based on public input, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East. In addition, under NYSDOT's revised design for the Community Grid Alternative, presented in this FDR/FEIS, there would be no vehicular connection between BL 81 and MLK, Jr. East.
- C 9-3: NYSDOT's Land Use Working Group for surplus land that will become available as a result of the Project must include the City, the school district, neighborhood representatives, environmental justice groups, economic opportunity and development organizations, and other stakeholders. Land use is a priority concern for the City and its residents, so there must be local control of decision-making regarding surplus land, and priority must be given to land uses that benefit environmental justice communities.
- R 9-3: Comment noted.
- C 9-4: NYSDOT/FHWA must reach an agreement on the goals being put forth, developed in cooperation with community stakeholders, for local hiring and to provide state and federal funds to train and prepare City workers throughout this multi-year project.
- R 9-4: NYSDOT will continue working with local stakeholders and the FHWA to develop local hiring initiatives and opportunities (see **Section 9.3** for more information about the job initiatives). NYSDOT is working with stakeholders, including the City and Urban Jobs Taskforce, to craft

and submit an application for local hiring preference for the I-81 Viaduct Project. This federal application process will allow NYSDOT the opportunity to create a local hiring preference goal for the Project and will include an expansion of NYSDOT's On-the-Job Training program for the Project to increase access for individuals to seek careers in heavy highway construction. This will help give greater opportunity for individuals living near the Project and in the City of Syracuse to work directly on the Project. NYSDOT has met with and will continue to share information and solicit input from individuals and representatives of organizations that focus on job advocacy, training, and placement, including community leaders, union representatives, work force advocates, and training organizations such as Urban Jobs Task Force. Topics discussed in these meetings have included how to devise methods to promote the use of a local work force and develop job training programs. As a result of received input, NYSDOT and New York State Department of Labor (NYSDOL) have partnered to create Workforce Forward: Syracuse. This program and \$1 million in funding will seek to connect workers to training opportunities and to good-paying short-term and long-term infrastructure jobs in and around Syracuse. For those seeking to work on the many ancillary jobs that will be created by this project, Workforce Forward will help place and train those individuals. The plan is to have NYSDOL in the local community connecting with people in the neighborhoods they live and help them find the employment or training they will need to be successful. NYSDOT also has the WorkSmart NY program in partnership with SUNY EOC (Educational Opportunity Centers), which is helping give those who want to work in infrastructure construction the basic skills to work on any job site. NYSDOT has applied for federal grant funds through FHWA to expand the program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program will grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship, a program to help get more people involved in local trades unions. NYSDOT has recently secured federal State Transportation Innovation Councils (STICs) funds to create a new, interactive video program to introduce and encourage High School students to pursue careers in heavy highway construction. The plan is to work directly with the Syracuse City School District and its P-Tech program to show students the vast opportunities they have in the field of building infrastructure through first-person videos by students and individuals working on projects. The idea is to use the I-81 Viaduct Project as a catalyst to create video content that students can explore to learn more about fields of interest. NYSDOT wants to create a unique, meaningful program that would lead to opportunities for long-term employment on the Project.

- C 9-5: The traffic detour will create wear and tear on the pavement of City streets. Mitigation measures must be taken to repair City streets that are negatively impacted by use as detour routes.
- R 9-5: Post-construction, NYSDOT would re-evaluate the condition of the designated detour routes, determine if damage was caused as a result of construction (and not normal wear and tear), and make improvements as appropriate.

- C 9-6: The City has plans to convert Clinton Street to a two-way operation south of Jefferson Street and has consulted with NYSDOT on conversion north of Jefferson Street, with the City agreeing not to proceed at this time. NYSDOT must provide clarification as to the precise portions of Clinton Street that will be converted to a two-way operation and the timeframe for doing so.
- R 9-6: The City would convert the portion of Clinton Street between West Jefferson and Tallman Streets from one-way to two-way operation, sometime between 2026 (estimated time of completion) and 2056 (estimated time of completion plus 30). The text that appeared on page 5-23 of the DDR/DEIS has been modified in this FDR/FEIS.
- C 9-7: Much of NYSDOT's proposed reconstruction covers only portions of blocks, stopping short of the closest cross street. NYSDOT must provide consistent reconstruction of streets to the closest cross street as opposed to stopping mid-block as is shown on many streets. For example, the proposed reconstruction of Water Street is shown as stopping mid-block between Almond Street and Forman Street, and the reconstruction of Fayette Street is shown as stopping mid-block between Almond Street and McBride Street.
- R 9-7: Extending the construction limits beyond mid-block on the side streets or to the closest cross street is not needed as part of the Project. The Project includes the amount of work that is necessary to blend the work limits with intersecting streets as quickly as possible so as to minimize impacts to the traveling public.
- C 9-8: Compared with the No Build Alternative, there will be fewer intersections operating at unacceptable levels (Level of Service E and F) under the Community Grid Alternative, from 11 intersections (No Build) to 3 (Community Grid), but there will still be a substandard level of service at three intersections in 2026 and one intersection in 2056. NYSDOT must identify ways to improve levels of service and traffic flow at the three substandard intersections identified: Comstock Avenue at Stratford Street (2026 am peak and 2056 pm peak); Teall Avenue at Erie Boulevard East (2026 pm peak); and Walnut Avenue at East Water Street (2026 pm peak).
- R 9-8: The Comstock Avenue/Stratford Street intersection, which is projected to operate at LOS F under the Community Grid Alternative, also is projected to operate at LOS F under No Build conditions. This is an unsignalized intersection where small traffic increases from growth may cause the intersection to fail. The Teall Avenue/Erie Boulevard East and Walnut Avenue/East Water Street intersections are projected to operate at the low end of delay for LOS E (i.e. borderline LOS D/E). All three of these intersections are near the fringe of the Project's traffic study area and may be mitigatable with signalization, signal timing improvements, or other minor mitigation measures. NYSDOT will work with the City during the final design phase to identify improvements if needed.
- C 9-9: Construction effects on Wilson Park, although described in the DEIS as "temporary," must be regarded as more than such. While NYSDOT intends to repurpose part of Wilson Park during

construction and make improvements upon completion, it must continue to work with the City Department of Parks Recreation and Youth Programs and the community to plan and construct new/alternative parks amenities (courts, fields, exercise areas, etc.) for use by area residents whose recreational and social activities are affected.

- R 9-9: As documented in **Section 6-4-2** and **Chapter 7** of the DDR/DEIS and FDR/FEIS, the easternmost portion of Wilson Park currently encroaches on NYSDOT right-of-way and this area would be used by NYSDOT to demolish the viaduct. As shown on **Figure 6-4-2-3** in **Section 6-4-2**, NYSDOT has determined the limit of disturbance will be at the blue "ROW Line," which further minimizes impact to the park. In addition, a 20-foot-wide adjacent strip, or 0.12 acres, of Wilson Park outside of the state right-of-way would be inaccessible (for less than one year) during the construction period of the Community Grid Alternative to serve as a safety buffer between the section of the park that would remain open and the construction zone. The Contractor would install fencing around this buffer area. The buffer area includes one of the two existing basketball courts at the park, as well as a section of grassy area. NYSDOT would provide a new basketball court prior to construction, so that two courts would be available during construction and three would be available in the permanent condition. The use of 0.12 acres constitutes a small section of the 2.1-acre park, and the inaccessibility would be temporary.

Additional improvements include adding a third hoop and backboard in the new court; adding benches in the new court; planting new shade trees; installing a new water fountain in the basketball court area; a new splash pad; paving new paths to provide access from Jackson Street; improving fencing and pedestrian gates; and improving parking amenities. These park improvements were discussed and developed in coordination with the City of Syracuse Department of Parks, Recreation and Youth Program and Syracuse Housing Authority. Once construction is complete, the affected existing basketball court would be reconstructed, and the adjacent lawn area would be graded and reseeded. Thus, upon completion of construction, Wilson Park would be returned in its entirety to park users, in an improved condition and with additional recreational facilities. No change in ownership would occur.

During final design and construction, NYSDOT would continue to coordinate with the City of Syracuse Department of Parks, Recreation and Youth Program, as well as the Syracuse Housing Authority, regarding construction activities and the improvements to Wilson Park. The construction of a new park would not be transportation-related and would fall outside of NYSDOT's authority.

- C 9-10: The DEIS states that "a portion of" Wilson Park would be closed during construction, but that the community center and other portions of the park would remain open. The continuation of operations at the community center next to a construction site is not practical or safe. In addition, if the only pool available to this neighborhood is closed for an extended construction period, an undue burden would be placed on the children in this neighborhood. NYSDOT must provide funding for a temporary neighborhood pool and an alternative community center for the duration of the closure of those facilities due to construction.

- R 9-10: As depicted in **Figure 6-4-2-3**, a 20-foot-wide space (0.12 acres) within the easternmost edge of the park would be unusable for less than a year during the construction period for the Community Grid Alternative. However, there will be no impacts to the pool or community center, which are located in the western half of the park and are more than 100 feet from the construction zone. These amenities can remain open during their normal operation hours.
- As noted in **Table 4-7** in **Chapter 4, Construction Means and Methods**, NYSDOT will implement measures to minimize or otherwise mitigate effects. There will also be a physical barrier to provide separation of work activities from the park. These measures will enable the pool to operate safely and effectively during the summer months.
- Access to all other park and recreational resources would be maintained during construction. Additional requests for funds are not related to transportation and thus fall outside NYSDOT's authority.
- C 9-11: Appendix A-1, Part 2, Drawing GP-CG-H10-07 provides no context for any Wilson Park potential improvements, nor are materials to be used specified. The City Department of Parks, Recreation & Youth Programs must be considered as part of the staff support and planning team when determining the mitigation and development of Wilson Park. Any changes to Wilson Park should include adequate connections between shared-use paths and the park landscape and amenities, and a planning process must be implemented to establish a park frontage along a rebuilt Almond Street.
- R 9-11: As documented in **Section 6-4-2** and **Chapter 7** of the DDR/DEIS and FDR/FEIS, NYSDOT would make improvements to Wilson Park as part of this Project. The park improvements were discussed and developed in coordination with the City of Syracuse Department of Parks, Recreation and Youth Program and Syracuse Housing Authority. During final design and construction, NYSDOT would continue to coordinate with the City of Syracuse Department of Parks, Recreation and Youth Program, as well as the Syracuse Housing Authority, regarding construction activities and the improvements to Wilson Park.
- C 9-12: Wilson Park is proposed to be used as a site for equipment staging during construction, and 20 feet of space within the eastern edge of Wilson Park will be heavily altered through high levels of soil compaction. Further, 0.12 acres of Wilson Park will be occupied for two years through a temporary easement, creating conditions with the potential to cause long-term soil and site drainage issues. NYSDOT must (1) ensure all areas with soil impacted by construction activity, including areas accumulating large amounts of silt, sand, and dust are considered for additional mitigation; and (2) require that all compacted soils be tilled and amended by mixing organic matter into the top 3 feet of the topsoil.
- R 9-12: As documented in **Section 6-4-2** and **Chapter 7** of the DDR/DEIS and FDR/FEIS, the eastern edge of Wilson Park is within the existing NYSDOT right-of-way. A portion of Wilson Park (0.12 acres) outside and adjacent to the right-of-way would not be publicly accessible for less than one year during the construction period of the Community Grid Alternative to provide a safety buffer between the operating sections of the park and the construction zone. NYSDOT

would coordinate this temporary closure through an agreement with the Syracuse Housing Authority and the City of Syracuse Department of Parks, Recreation, and Youth Programs. This buffer area would be fenced off from the remainder of the park and would be inaccessible to park users (see response to **Comment 9-9** for further details). With respect to management of soil conditions, NYSDOT would follow New York State Standard Specification Section §107-08 Protection and Restoration of Property and Landscape, C. Restoration, which addresses this concern. This specification in part discusses the following actions:

- Clean up as required, grading as shown on a grading plan if required; or graded so as to blend into the surrounding ground forms.
- Scarification of yards, batch sites, haul roads, etc., to the depth necessary to support vegetation.
- The fertilizing, seeding, and mulching of disturbed areas.
- The restoration of disturbed areas shall be accomplished prior to contract final acceptance.
- These provisions will be part of the Construction Contract requirements.

C 9-13: We call on NYSDOT to provide the City with advance notice of trail closures, estimated timeframes for reopening and communicate with City of Syracuse Parks staff, including the City Trails Coordinator, concerning alternative routes, detours, and mitigation planning.

R 9-13: NYSDOT will continue to work with the City of Syracuse during design to coordinate closure of any routes or other mitigation planning of trail closures. During construction, stakeholders, including the City of Syracuse, as well as the public will be informed of closures in advance in accordance with the Project's communication plan prior to construction, as discussed further in **Section 4.5.2** of the DDR/DEIS and FDR/FEIS.

C 9-14: NYSDOT must amend the proposed plan visualizations of Forman Park in Figure 3-28 to match Construction Drawing GP-CG-H10-12.

R 9-14: The figure and plan have been modified.

C 9-15: NYSDOT must increase the proposed Forman Park curb radius, as shown in Appendix A-1, Part 2, Drawing GP-CG-H10-12, to one more appropriately suited for the park's location and level of use.

R 9-15: This will be considered during final design.

C 9-16: All proposed landscaped areas and buffers must be provided through a schedule and map to be shared with municipal stakeholders, and designs for any proposed and/or updated landscaped areas and buffers should consider surrounding area conditions including drainage, snow storage, nearby utilities, traffic, recreation ability, ecology, and neighborhood context.

- R 9-16: Detailed plans will be developed during the Project's final design phase. These plans will consider existing and proposed roadside features such as drainage, snow storage, utilities, buffers, and landscaping. Plans will be shared with municipal stakeholders before they are finalized.
- C 9-17: NYSDOT should ensure that all new open areas and rebuilt green spaces are adequately replanted and seeded with native grass seed and shrubs. Traffic island areas should be void of impervious surfaces that would negatively impact surrounding plant life and neighborhood character and should also contain a mix of plantable structural soil and topsoil at a three-foot depth from surface to subgrade. In addition, NYSDOT should consider a redesign of the intersection of Hickory Street and Pearl Street to avoid the proposed 90 degree turn from Pearl Street southbound to Hickory Street eastbound that could create an adverse impact on winter-seasonal traffic through the accumulation of roadway snow. Adequate snow storage space should also be considered in this area.
- R 9-17: Landscaping and plantings would be progressed in final design in collaboration with the City. Design details regarding the Pearl Street/Hickory Street intersection would also be determined in collaboration with the City during final design consistent with the Project's needs and objectives and the City's vision for the street.
- C 9-18: We request that the list of community buildings as shown in Section 6-2-1.1.4 be amended to include City Hall Commons.
- R 9-18: The text has been modified accordingly.
- C 9-19: NYSDOT must examine the original entrance of Oakwood Cemetery and consider alternatives to restore the connection between this historic asset and the community. Not only did the original construction of I-81 block the cemetery's main entrance, it also blocked certain direct access points. In addition, the impact of noise pollution on the cemetery and the surrounding neighborhood has been significant. NYSDOT should repair and stabilize the stone cemetery gate and introduce enhancements that improve the overall appearance along the Business Loop 81/cemetery boundary.
- R 9-19: **Section 6-4-1** and **Appendix E** of the DDR/DEIS and FDR/FEIS document the assessment of effects to historic properties for the Project under Section 106 of the National Historic Preservation Act.

The portion of I-81 that is located along the western edge of Oakwood Cemetery was constructed on an earthen embankment in the early 1960s. Construction of the earthen embankment required the closure of the original main entrance along Oakwood Avenue (former entrance) and led to the abandonment of the cemetery's original stone entrance gate. Oakwood Cemetery was subsequently listed on the National Register of Historic Places under Criterion C for its landscape architecture, art, and funerary architecture (May 9, 1991), well after the construction of I-81 and the subsequent relocation of the original main entrance.

As currently proposed, the Project would retain the existing horizontal and vertical alignment of I-81 and no construction activities are planned along the section of I-81 adjacent to Oakwood Cemetery. FHWA, in coordination with NYSDOT and in consultation with the State Historic Preservation Office, applied the Criteria of Adverse Effect (36 CFR 800.5(a)(1)) to National Register listed and eligible architectural properties within the Section 106 Area of Potential Effects (APE) for the Project, including Oakwood Cemetery. As documented in the Section 106 Finding Documentation (provided in **Appendix E-4** of the DDR/DEIS and FDR/FEIS), the Project would not involve the temporary or permanent acquisition of land from Oakwood Cemetery, there would be no changes to or removals of any building/structure or other contributing features of Oakwood Cemetery, and the Project would not alter the character of the setting compared to existing conditions.

In consideration of comments received from Section 106 Consulting Parties, as part of the Community Grid Alternative, NYSDOT reviewed an at-grade intersection with BL 81 concept and a grade-separated crossing concept carrying BL 81 over a reconnected Oakwood Avenue to re-establish the former entrance to Oakwood Cemetery; however, neither of these options were determined to be reasonable. Implementation of the I-81 Project would not preclude others from making improvements to the grounds of Oakwood Cemetery as part of a separate, independent action.

- C 9-20: The DEIS indicates that broad effects to social groups are not anticipated (see Section 6-2-2.4.2, page 6-74 and Table 4-7, page 4-40). While the DEIS gives consideration during construction regarding impacts on Loretto (proposed building of wall), there is nothing similar for Vinette Towers or other residential housing adjacent to the construction site. Noise and air issues must be appropriately recognized and mitigated throughout the construction area, for all impacted residents.
- R 9-20: Vinette Towers is approximately $\frac{3}{4}$ miles from the Project limits; due to this distance, Vinette Towers would not experience noise or air quality impacts during construction. The protocols outlined in **Table 4-7** would apply throughout the Project area. Loretto is adjacent to the Project limits and therefore construction mitigation measures will be put in place, as will be the case for other residences in proximity to the work zones.
- C 9-21: We request more information with respect to the enforcement of the proposed construction mitigation measures to minimize of impacts to air quality and protect sensitive receptors including schools, hospitals, etc. If these techniques are to be strictly enforced, we request that NYSDOT implement penalties for breaches and remediation policies for impacted parties and must strike the “when reasonable” language in favor of objective limits which are not subject to interpretation. With respect to the limits on means and methods between MLK, Jr. East and Harrison Street, NYSDOT should consider implementing similar limits at other locations along the proposed BL 81 through downtown that would similarly be impacted by construction (e.g., residential apartments, health care facilities, hotel at Forman Park).

- R 9-21: As stated in **Chapter 4 (Table 4-7)**, **Section 6-2-3**, and **Section 6-4-4** of this FDR/FEIS, an outdoor ambient air quality monitoring program would be implemented during construction of the Project and would be overseen by NYSDOT. The program would consist of real-time particulate monitoring at a number of locations within the local community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design.

Background particulate monitoring would be conducted as part of the program to establish and routinely verify baseline levels. During construction, real-time particulate matter data would be collected at an established interval (for example, measurements every 10 seconds and logged in 15-minute periods) and time-weighted over 24 hours for comparison to the USEPA's National Ambient Air Quality Standards (NAAQS). These standards are designed to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly, with an adequate margin of safety. If the data show that air quality levels are approaching a concern level (to be established during final design) that could result in an exceedance of the 24-hour NAAQS, then operational and/or mechanical deficiencies would be identified and corrected. If the data result in any particulate air quality levels that exceed the 24-hour NAAQS, then the applicable construction activities would be suspended until the deficiencies are identified and corrected.

This FDR/FEIS has been revised to include the above information, including the commitment to locate a monitor outdoors in the vicinity of Dr. King Elementary School.

The environmental commitments and mitigation measures for this Project will be identified in the Record of Decision for the Project, and, as a result, will be adopted as part of the lead agencies' decision on the Project. Enforcement of construction mitigation measures/techniques and penalization of contractors would be undertaken in accordance with procedures outlined in NYSDOT's standard specifications, pertinent environmental regulations, and contract documents to be developed during final design.

The term "when reasonable" is included in limited instances when describing a construction mitigation measure in the DDR/DEIS and FDR/FEIS to account for a potential situation where the measure could introduce a safety, operational, and/or constructability concern that would make the measure infeasible and/or impractical. For example, **Table 4-7** of this FDR/FEIS includes the following measure: "Implement temporary construction noise abatement measures that would include shrouds or other noise curtains, acoustic fabric, soundproof housings, physical barriers, and/or enclosures to reduce noise from pile drivers, compressors, generators, pumps, and other loud equipment when reasonable." "When reasonable" was included in this instance to account for an event where a temporary physical noise barrier could introduce public safety concerns.

As described in **Table 4-7** of this FDR/FEIS, specific construction noise and vibration mitigation measures have been established for the construction zone between MLK, Jr. East and Harrison Street. This zone includes facilities that are extremely sensitive to construction

noise and vibration, such as the surgery center at the Upstate Medical facility. As stated in **Table 4-7** and described in **Section 6-4-6**, a construction noise and vibration monitoring program, as well as a robust set of additional mitigation measures, would be implemented within the overall construction limits for the Project.

- C 9-22: The DEIS explains that Construction Phases 2A1, 2A2, and 2A3 will involve a detour of eastbound I-690 traffic through downtown Syracuse to run adjacent to Clinton Square and local streets. This extended detour of highway traffic along the Central Business District's primary plaza, festival, and gathering space will increase vehicle and pedestrian risks. Potential shutdowns and detours of streets along Clinton Square or nearby may cause substantial disruption of summer civic events, including revenues generated through permitting by the City of Syracuse. NYSDOT must modify its plans to employ appropriate safety measures to minimize impacts to spaces used for public events, including signage, detour notification, rehabilitation of affected areas, and reconstruction of safe and accessible crossings.
- R 9-22: As shown in **Figure 4-10**, the detour route is along Touring Route 5, an arterial in the City. All the roads in the detour were analyzed for capacity and operations and improvements are being made where necessary, as shown in **Figure 4-4**. Signage and safety precautions will be implemented during construction. Coordination with the City of Syracuse will continue in final design to develop solutions that minimize impacts.
- C 9-23: NYSDOT must implement work zone traffic control measures that accommodate pedestrians, cyclists, and transit users via direct routes, not blanket sidewalk closures and detours. Detours should only be employed as a last resort. Pedestrian sheds, physically protected diversions, and other solutions should be considered first.
- R 9-23: Pedestrian routes would be maintained throughout construction, although there may be times during critical construction operations where detours may be necessary (refer to **Table 4-7** for more information).
- C 9-24: According to the DEIS, NYSDOT'S proposed walk-in office providing project information to the public is open Monday through Friday from 9 a.m. to 5 p.m. NYSDOT must ensure it will be available to the City, residents, and other stakeholders during the six-year project construction for dissemination of information, including construction updates, upcoming closures, claims, general information, and coordination with property owners, among other issues. Establishing a field office (as proposed), a point of contact (or team), and a website/app to provide this information and access to the project is essential. NYSDOT must also implement weekend and evening hours at its field office. NYSDOT should specify and employ media (e.g., Southside Stand, Urban CNY, Northside e-blast, etc.) targeted to impacted neighborhoods. The proposed phone line should include non-English services.

In addition, the Air Quality Control section of the DEIS must specify how notifications will be given to those affected when air quality safety limits are exceeded. Noise and vibration

mitigations are listed as being employed “when reasonable”; however, more specific details must be provided concerning how reasonability is to be determined, especially given that construction is proposed to occur from 6:00 AM to 9:00 PM. Note that the City’s Construction Noise Ordinance Section 40-6 General Ordinances states, “No noise between 9:00 PM and 7:00 AM Mon-Sat and no noise on Sunday and Holidays. This shall not apply to emergency work, and safety and protective devices.”

- R 9-24: Providing up to date project information during the construction phases is a critical step in successfully reducing impacts to the City, residents, businesses, travelers, and other stakeholders. A project outreach center would be reopened prior to commencing the construction phases. The location of the new project outreach center has yet to be determined but it will be located downtown close to the construction work. A Community Liaison/Public Information individual will be put in place prior to construction to help facilitate communication with the public. NYSDOT will continue to maintain a hotline 24/7/365 for the public to access and return calls during business hours. Non-English communication with the public will be handled similar to the way it was during the preliminary design phases and will include Spanish translation and American Sign Language translation when appropriate. Other language translation will be provided when requested by the public. Media will be utilized to share information with the public. Any exceedance of threshold levels established for air quality, noise, or vibration will result in NYSDOT stopping the Contractor’s work and requiring them to comply within the established tolerances. No contractors have been selected so work hours have yet to be established for each individual contract.
- C 9-25: As mitigation for local businesses affected during construction, in addition to directing the contractor to install temporary business signs to identify business entrances and direct customers to businesses that would be affected by detours, NYSDOT must provide information about how to access businesses in the App or Social Media Platform identified in the public engagement commitments section of Table 4-7.
- R 9-25: The I-81 Viaduct Project will have continued and substantial public outreach into and through the construction phases. Minimizing or avoiding impacts to businesses and customers during construction is a major goal of NYSDOT’s. NYSDOT will work with each business and individual situation and direct the Contractors’ work to avoid or minimize impacts. NYSDOT will provide the public with detailed information about the detours and road closures in advance of the work. The I81opportunities website will be used to share access to business information with the community.
- C 9-26: NYSDOT must provide additional information about impacts resulting from the replacement of the NYS&W Railway bridge and relocation of the railroad tracks concerning (1) how far railroad track upgrades will extend, (2) the extent of any impacts to the existing footprint of the railroad, and (3) any impacts to residences and businesses during these construction phases.
- R 9-26: NYSDOT continues to coordinate with the NYS&W Railway regarding the replacement of the bridge and relocation of the railroad tracks. Residents and businesses will be informed of any

impacts in accordance with the public outreach program to be developed during construction. Refer to **Appendix A-1** for additional information.

- C 9-27: NYSDOT must provide the City with funding for additional firefighters and equipment (in strategic locations) during each phase of this project to ensure that emergency services are not critically disrupted during construction.
- R 9-27: Conceptual Construction Phasing/Maintenance and Protection of Traffic plans can be found in **Appendix A-1-7** of the DDR/DEIS and FDR/FEIS. The final design of the Project will include details that show how traffic will be managed crossing BL 81. In areas where it is feasible, staged construction will be utilized; in other areas, detours will be utilized. NYSDOT will work closely with the City of Syracuse including the Fire Department to minimize delays caused by construction activity and continually update the City on planned work and associated impacts, including street closures. NYSDOT would look to stagger bridge removal operations such that adjoining parallel streets would be available for emergency east-west movements. NYSDOT's plan is to maintain traffic on-site using staged construction as much as practical, thus minimizing the need for additional firefighters and/or equipment as a result of the NYSDOT's construction activities. NYSDOT does not have the authority to provide funding for additional firefighters or equipment as part of the Project.
- C 9-28: NYSDOT must provide the City with funding for a fire station (and personnel) covering the area east of the I-81 viaduct that according to the DEIS will become geographically isolated during the construction phase of the Project.
- R 9-28: NYSDOT looks forward to continuing to collaborate with the City of Syracuse throughout the life of the I-81 Viaduct Project. As noted in **Section 4.4.1** of the DDR/DEIS and FDR/FEIS, it is expected that there would be temporary lane closures on Almond Street and various local roads, but access east-west across the City would be maintained as much as feasible. NYSDOT is committed to working with emergency responders to minimize delays to response times. Prior notification of any closures will be given to emergency service providers. NYSDOT is committed to working with emergency responders to minimize delays to response times. NYSDOT does not have the authority to provide funding for a fire station as part of the Project.
- C 9-29: To ensure safe and efficient emergency travel both during construction and after completion of the Project, NYSDOT must install Opticom systems at every new intersection the community grid creates or provide the City with funding for Opticom traffic preemption systems at all intersections created by the community grid.
- R 9-29: Use of Opticom traffic preemption system is standard at NYSDOT maintained intersections in the City of Syracuse. NYSDOT will incorporate this technology into our final design for signal replacements.

- C 9-30: NYSDOT must provide the City with funding for additional firefighters and equipment (in strategic locations) during each phase of this project to ensure that response times are not severely impacted.
- R 9-30: See response to **Comment 9-27**.
- C 9-31: NYSDOT must provide the City with funding for extra hazmat resources, or reimbursement for equipment and supplies used to mitigate any releases/spills.
- R 9-31: As documented in **Section 6-4-10** and **Appendix L** of the DDR/DEIS and FDR/FEIS, a Hazardous Waste/Contaminated Materials (HW/CM) Assessment was prepared for the Project. The purpose of this assessment was to identify the potential for encountering hazardous and non-hazardous contaminated materials during the planned construction work. As the Project progresses, there will be further environmental investigation, removal, and mitigation of hazardous materials in accordance with NYSDOT policies and any required regulations.

As described in **Section 6-4-10** of the DDR/DEIS and FDR/FEIS, the Contractor would be required to prepare a site-wide Soil Management Plan prior to the start of work outlining procedures to be followed any time evidence of contamination, and/or potential contamination, is suspected or identified. Once evidence of contamination is identified by the Contractor in the field, an environmental monitor hired by the Contractor would be on call to assist with the screening and management of soils that show signs of contamination. As stated in **Section 6-4-10** of the DDR/DEIS and FDR/FEIS, mitigation would result in the removal and proper disposal of all contaminated materials that are excavated during construction. Any spills during construction (e.g., oil, gasoline, brake fluid, transmission fluid) would be contained immediately and properly disposed of off-site. Language has been added to **Section 6-4-10** of this FDR/FEIS to discuss the management of potential spills during construction.

The potential for encountering future contamination associated with any sites impacted by the Project would be reduced by the cleanup actions conducted during construction. Operationally, rather than require an emergency response via the Syracuse Fire Department, maintenance and cleanup activities for construction purposes would be performed in accordance with applicable State and Federal laws and standard NYSDOT roadway operating procedures.

Therefore, NYSDOT is not anticipating an increase in hazmat response needs resulting from construction activities. NYSDOT will discuss and coordinate with the City of Syracuse and its Fire Department/Hazmat Response Teams responses to non-construction related hazmat events. NYSDOT will continue discussions with the City of Syracuse and its respective teams on what City streets may be impacted due to closure and/or which street closures may need to be staggered to ensure the safety of the traveling public. Additional funding cannot be provided, as it is not related to transportation and thus not under the NYSDOT's authority.

- C 9-32: NYSDOT must consider allowing the Syracuse Fire Department access to any camera systems the State may add to the new road system to enhance response time to traffic and accidents along the new routes or changed roadways.
- R 9-32: NYSDOT will continue to collaborate with the City of Syracuse, including the Fire Department. Any arrangement will need be the subject of a written agreement.
- C 9-33: NYSDOT provide the City with funding to offset increased police department costs associated with the Project.
- R 9-33: NYSDOT requests further discussions with the City of Syracuse and specifically the Police Department to determine what their needs are and how the Project would impact their patrol units. Any additional funding is not transportation related and thus not under the authority of NYSDOT.
- C 9-34: NYSDOT must coordinate with the City Department of Engineering and other relevant municipal authorities regarding any geotechnical abnormalities existing around the SU hill, including the possibility of infiltrating water in the ground and gypsum layers, prior to undertaking work in these areas.
- R 9-34: NYSDOT will coordinate with the City Department of Engineering and other relevant municipal authorities as needed. Refer to **Section 6-4-7** of the DDR/DEIS and FDR/FEIS for discussion of Water Resources.
- C 9-35: The DEIS states that in general, NYSDOT will pay the cost of installing replacement light fixtures for existing lighting that is impacted by a state highway project, and the cost for maintenance would either be funded through a tariff rate with National Grid or through the City of Syracuse. The City will need to review this impact as the lighting scheme will be in the NYSDOT right-of-way. Accordingly, the City may not be able to set up a lighting district due to the fact that the right-of-way does not belong to the City. If the lighting is somehow on City land then districts could be established and the adjoining property owners charged with a special assessment for the upkeep of the lighting. The City and NYSDOT need to discuss this further.
- R 9-35: Comment noted. NYSDOT looks forward to continuing to work with the City of Syracuse on issues such as lighting.
- C 9-36: In multiple sections of the DEIS, NYSDOT indicates that the final selection of site elements such as lighting will be determined during the final design. Lighting is an important project element that must be considered prior to the final design stage of the Project. In addition to the appropriate lighting of vehicular travel lanes, pedestrian scale lighting must be included along sidewalks, bike lanes, under I-690, and in gathering areas like the Canal District, the Creekwalk, and the Lodi Street Overlook area, among others. Lighting should also be used at gateways into the downtown area and cannot be the typical highway lighting used on the rest

of I-81; it should be distinct and distinguishable to signal different conditions as users enter the downtown area. NYSDOT must provide consistent lighting treatments for pedestrian, bicyclist, and shared use areas across project limits, including bridges, underpasses, and typical street sections.

R 9-36: Comment noted.

C 9-37: NYSDOT must provide further information in compliance with applicable City requirements and lighting installation policies about lighting during construction and demolition.

R 9-37: Comment noted.

C 9-38: During the public hearings, many concerns were voiced regarding the impacts of construction directly adjacent to MLK School. As noted in the DEIS, the proposed construction in this area will require two bridges to be removed as well as the removal of associated structural elements such as abutments and retaining walls and entail construction of a new railroad bridge. The DEIS states that NYSDOT will "use saw cutting methods and prohibit impact hammers during the demo of existing structures when reasonable" and "direct contractor to use drilled foundations on all bridge piers and other support structures and prohibit pile driving method." However, noise impacts from the construction are still expected. Overall, the DEIS offers limited discussion regarding protection of the school facility during construction and contains no provision for an alternate school location during construction. NYSDOT must extend the Almond Street Boulevard using slow speed boulevard treatments (narrow lanes, intersections, shared use path, median/trees and other design elements) to an area south of MLK School and locate the roundabout in an area, at least, 600 feet from any school.

R 9-38: Based on public input, NYSDOT and FHWA are no longer proposing a roundabout at MLK, Jr. East. Refer to **Table 4-7** of this FDR/FEIS for details about noise monitoring and other construction mitigation measures.

C 9-39: The DEIS states that one-way bike lanes would be provided on both sides of MLK Jr. East between Almond Street and Leon Street, but this statement is not reflected in NYSDOT's plans. The proposed roundabout at MLK/Almond (BL81) does not show bike lanes. The DEIS statement must be revised for further clarification.

R 9-39: The text in the FDR/FEIS has been modified to clarify that from Burnet Avenue to Erie Boulevard, one-way bicycle lanes would be provided on each side of Almond Street; from Erie Boulevard to Adams Street, on- way raised cycle tracks would be provided on each side of Almond Street; and from Adams Street to the MLK, Jr. East/Leon Street intersection, a shared use (bicycle and pedestrian) path would be provided on the west side of Almond Street/BL 81. Shared lane facilities would be provided on both sides of MLK, Jr. East between Leon Street and Oakwood Avenue.

- C 9-40: The DEIS proposes placement of sharrows on MLK at Leon Street, with the expectation that cyclists will dog-leg around the intersection to transition between the shared-use path and sharrow facilities. NYSDOT must continue the shared use path to a more logical terminus area with bike facilities such as Salina Street or the Creekwalk.
- R 9-40: The shared use (bicycle and pedestrian) path would transition to a shared vehicle/bicycle lanes at MLK, Jr. and Leon Street as there are no adjacent off-road facilities to which the path would transition. This configuration would not preclude the City from extending the dedicated shared use path in the future.
- C 9-41: The DEIS indicates that a noise barrier will be installed on the south side of the MLK roundabout but not on the north side of the roundabout adjacent to MLK School. A noise barrier must be installed adjacent to MLK School.
- R 9-41: The noise analysis indicated that, based on the NYSDOT Noise Policy, the Community Grid Alternative would not result in any noise impacts at the Dr. King Elementary School. Since there would be no impact, no noise abatement is proposed at the school (refer to **Table 6-4-6-2** of the DDR/DEIS and FDR/FEIS for FHWA Noise Abatement Criteria and Activity Categories). Therefore, noise abatement is not recommended for this area. Note that under the Community Grid Alternative, the roadbed of the current I-81 will be removed; however, a portion of the embankment would be left in place. The roadway alignment of the Community Grid Alternative would be at a lower elevation than the current I-81 and horizontally farther to the east, and the remaining portion of the former I-81 embankment would form a berm between the new roadway and the school. Under the current design, the berm would form a barrier up to 20 feet high in some of the more northern locations and back to grade in the area of the proposed shared use (bicycle/pedestrian) path along MLK, Jr. East. An additional benefit of this berm is that it would help reduce noise levels.
- C 9-42: The DEIS lists six City streets/corridors that will be used as potential detour routes, and the increased traffic will result in a perceptible noise level increase at noise sensitive receivers such as schools, hospitals, churches, and playgrounds. It will also have an adverse effect on some businesses and residents. NYSDOT must develop a plan for reducing noise in these instances.
- R 9-42: As indicated in the comment, the noise study has shown that some of the detour routes are anticipated to create a perceptible increase in noise levels to receptors along these roadways. The State has developed a plan for reduction of construction noise; however, noise abatement is not practical for the temporary traffic noise increases along the detour routes. These detour routes are through urban areas where noise abatement options would be limited to detour relocation. While detour relocation was considered, detour routes were selected to maximize efficiency of traffic flow. Additionally, given the density of noise receivers throughout the urban areas of Syracuse, re-routing detours would generally only affect a different set of receptors. Detours will be temporary in nature and will be constantly updated as construction is completed along the corridor. Detours will be kept to the minimum required to accomplish the

work. With respect to construction equipment noise, as described in **Chapter 4, Construction Means and Methods**, NYSDOT would require that the Contractor implement construction protocols and practices to mitigate effects for the Project. **Table 4-7, “Measures to Minimize Community Impacts,”** in the DDR/DEIS and FDR/FEIS identifies commitments to methods that would be included in the contract for the abatement of construction noise. In addition, **Section 6-4-6.5.5** identifies additional potential abatement strategies that could be incorporated into the construction project.

- C 9-43: MLK School was not identified to be studied to determine if noise insulation is warranted. Given the many concerns about I-81 being at grade near MLK, a noise study must be performed to determine the appropriate design of building sound insulation and noise barrier placement.
- R 9-43: See response to **Comment 9-41**.
- C 9-44: In the DEIS, noise barriers were determined to be the most effective method of noise abatement; however, noise barriers were not considered feasible along the local streets in much of the Central Study Area of the project since openings for driveways would need to be provided for the residences and businesses, thereby negating the effectiveness of the noise barrier. Therefore, no detailed evaluation of such barriers in the downtown area was conducted. Further studies concerning other methods of noise abatement for these areas must be undertaken.
- R 9-44: The noise analysis study area for this Project, as described in **Section 6-4-6** of the DDR/DEIS and FDR/FEIS, included the affected downtown area. No detailed evaluation of noise barriers was appropriate for the downtown area; however, as indicated in the DDR/DEIS and FDR/FEIS, all other manners of noise abatement available to NYSDOT projects were assessed for the entire noise analysis study area (inclusive of the urban areas) and none were found to be appropriate. See **Sections 6-4-6.4.5** and **6-4-6.5.5** of the DDR/DEIS and FDR/FEIS for information on the noise abatement analysis.
- C 9-45: Disposition of surplus transportation right-of-way: The DEIS states that NYSDOT will form a land use working group to provide input in establishing a framework for the non-transportation use of each potential surplus parcel. This group must include the City, the school district, neighborhood representatives, environmental justice communities, economic opportunity and development organizations, and other stakeholders. As land use is a priority concern for the City and its residents, there must be local control of decision-making regarding surplus land. Formation of this group must begin at the start of construction, not at the conclusion of the project, as proposed by NYSDOT. Reuse and redevelopment of these potential sites should be focused on providing community benefits, which include economic development, recreation, and affordable housing among many others. These sites should meet these various needs based on their location, size, stakeholder input and feasibility.

- R 9-45: As stated in the DDR/DEIS and in this FDR/FEIS, NYSDOT is committed to working with the various stakeholders to dispose of surplus right of way that will not be used for transportation purposes. NYSDOT will formulate the land use working group during final design prior to the start of the construction phases. It is assumed that any new land use or development would have to comply with the City of Syracuse's zoning ordinance and its Land Use and Development Plan 2040 currently being updated by the ReZone Syracuse project.
- C 9-46: The DEIS references that NYSDOT and the City will continue to coordinate associated road ownership and maintenance roles and directly states that a maintenance agreement with the City will be needed for maintenance of sidewalks and shared-use paths and to facilitate energizing and maintenance of any new lighting constructed along City streets and the State-owned lighting along I-81 and I-690 within the City limits. The City is concerned that the costs/responsibilities associated with this maintenance will adversely impact the City budget, and that maintenance fees under the current maintenance agreement are insufficient. NYSDOT has already determined that maintenance of the shared path will be assigned to the City similar to the Empire State Trail. Further discussion with NYSDOT is needed.
- R 9-46: Comment noted. NYSDOT has been collaborating with the City on this topic and will schedule additional meetings to resolve outstanding issues as design progresses.
- C 9-47: NYSDOT is requested to reestablish lost parking in an efficient manner that is safer, well-lit, more aesthetically pleasing, and in a manner that has less impervious surface than the current surface parking arrangement. These new parking facilities are also an opportunity to use lighting, public art, creative wayfinding, and other design features to enhance the otherwise uninspired views of parked cars.
- R 9-47: NYSDOT will work with the City on the type of lighting, installation of public art, development of wayfinding signage, and any other design features related to parking areas.
- C 9-48: NYSDOT must provide further clarification regarding whether the new, approximately 575 on-street parking spaces will be metered and who will bear the responsibility for collecting parking meter fees. Some maintenance responsibility is being assigned to the City, but the City's maintenance fee has not been revised in many years. In addition, the City requests that fees from parking meters be allocated to the City to help compensate for City maintenance costs.
- R 9-48: A decision regarding whether parking would be metered or not has not been determined. However, NYSDOT can explore the potential for metered parking and the development of a proposal for the installation of parking meters on newly created on-street parking spaces and would coordinate with the City of Syracuse. Parking meters are not eligible for federal reimbursement but could potentially be included as a betterment. NYSDOT would control Almond Street and other New York State routes. The City of Syracuse would control local streets. However, NYSDOT would also continue to coordinate with the City of Syracuse on this topic.

- C 9-49: NYSDOT must ensure that new surface parking lots and the reinstallation of surface parking areas below I-690 be garaged in consolidated facilities that meet mixed-use objectives set forth by the City in previous correspondence. Parking facilities should also be well integrated with pedestrian and bicycle facilities, offering bike parking and coordination with transit.
- R 9-49: As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS, potential options were evaluated to mitigate the loss of public off-street parking spaces, including the replacement of existing parking facilities and the development of new surface parking lots. The preferred mitigation option proposes four new surface parking facilities, which would be situated near the existing parking facilities that would be removed under the Community Grid Alternative. Combined, the four proposed parking facilities would provide 896 public off-street parking spaces, which exceeds the minimum 817 that are needed. After further evaluation, it was determined that a new parking garage would not be required to mitigate the public off-street parking impacts.
- C 9-50: Currently, the DEIS contains no substantive provisions concerning transit accommodations within the Project Area. We request that the State coordinate with the City and Centro to provide transit shelters across the project area and create transit stops that meet existing Centro thresholds (within 25 percent) with respect to shelter boarding numbers. Additionally, we request that the State provide operational assistance for increased transit frequencies and/or Bus Rapid Transit across the project area as outlined by the MPO in previous reports.
- R 9-50: A stated objective of the Project is to “maintain access to existing local bus service and enhance transit amenities within the Project limits in and near Downtown Syracuse.” “Transit amenities” refers to bus stops and shelters, bus turnouts, and layover and turnaround places within the Project limits in and near Downtown Syracuse. As part of the development of the Viaduct and Community Grid Alternatives, NYSDOT will continue to coordinate with Centro on potential street improvements. In addition, NYSDOT considered the potential effects on public transit, pedestrians, and bicyclists for both build alternatives (see **Sections 6-2-2.3.1** and **6-2-2.4.1**).
- Operational assistance for increased transit frequencies and/or a bus rapid transit system are outside the scope of the Project. While the suggested transit improvements are not part of the I-81 Viaduct Project, the Project would not preclude Centro or others from carrying out the suggested transit improvements in the future, as separate, independent actions.
- C 9-51: The large intersections and a large number of travel lanes along Almond Street and other corridors as proposed in the DEIS do not address geometric and operation deficiencies for pedestrians and cyclists within the project limits and will require massive crossing spans for pedestrians. This would create a hostile environment for pedestrians and cyclists, especially for those traveling east/west who may have limited mobility. NYSDOT must consolidate through lanes and turning lanes and reduce the number of travel lanes for all Community Grid corridors to absolute minimums. Boulevard intersections along the Almond Street, Genesee

Street, West Street, Adams Street, and Harrison Street corridors should have no more than four lanes.

- R 9-51: Both alternatives include extensive amenities for pedestrians and bicyclists and would meet the Project objective to “address vehicular, pedestrian, and bicycle geometric and operational deficiencies within the project limits.” Curb bump-outs and a median would be provided along Almond Street, providing shorter distances for pedestrians and cyclists to cross. Appropriate pedestrian crossing timings will be further evaluated in final design. The number of travel lanes (in the case of Almond Street, two lanes in each direction with turning lanes as needed) has been determined based on the Project’s traffic studies to accommodate travel demand. See response to **Comment 4-43** for additional details.
- C 9-52: NYSDOT must improve the consistency of pedestrian and bicycle accommodations throughout the Project Area and connect improvements to existing facilities wherever possible, including the Bear Trap Creek Bikeway, Creekwalk, Loop the Lake Trail, Empire State Trail, and Connective Corridor. To further improve upon the consistency of these accommodations, NYSDOT should expand upon planned improvements to the highway right-of-way and on local streets, such as by creating a connection to the landlocked overlook and shared use path areas between Bear Street and Hiawatha Boulevard. Further, NYSDOT must provide a physically protected cycle track or shared use path as a continuous feature from the northern project limit, roughly from the Regional Transportation Center to the southern project limit on Colvin Street. Similarly, NYSDOT must provide physically protected bicycle tracks/shared-use paths across the bridges and approaching streets at Butternut Street, Spencer Street, Court Street, Brighton Avenue, and Glen Avenue. The sharrows currently proposed on a number of these streets are inappropriate for a project of this magnitude.
- R 9-52: As noted in **Section 5.6.2**, various pedestrian and cyclist connections would be made to existing facilities within the project limits. Connections to Empire State Trail, Connective Corridor, and Creekwalk, as well as numerous other connections, are included within the Project. Other City pedestrian and bicyclist connections fall outside the limits of the I-81 Viaduct Project and therefore would not be included. However, the Project does not preclude others from providing additional pedestrian and bicyclist connections in the future.
- C 9-53: NYSDOT must provide minimum eight-foot-wide sidewalks with matching or similar snow storage buffers along all affected areas, as is typical for other areas of the project, instead of the proposed five-foot-wide sidewalks. NYSDOT must also increase the number of fixed vertical objects (such as bollards) on sidewalks throughout the project area to prevent vehicle access without obstructing pedestrian or bike travel.
- R 9-53: The proposed five-foot-wide sidewalks along portions of Genesee Street, Almond Street, Washington Street, Fayette Street, and at other locations is needed to address identified pedestrian needs while minimizing right of way acquisition from adjacent property owners. Wider sidewalks and buffers spaces were provided when feasible, while the standard five-foot width was used when right-of-way was not available. The use of fixed vertical objects, such

as bollards, to control vehicle access without obstructing pedestrians or bicyclists will be considered on a case-by-case basis during final design. NYSDOT is committed to working with the City of Syracuse on the width of sidewalks of the various corridors.

- C 9-54: NYSDOT must consider alternatives for reducing mid-block crossing in dense, urban areas that do not incorporate a raised center median. In particular, alternative designs should be explored for the BL 81 corridor south of Harrison Street. Despite incorporating multiple new signalized intersections, the likelihood of mid-block crossings along the long blocks of this corridor continue to raise serious pedestrian safety concerns under the current plan.
- R 9-54: Comment noted. NYSDOT will collaborate with the City of Syracuse on these concerns during the final design phase.
- C 9-55: NYSDOT must provide a physically protected cycle track/shared use path along the entire Bear Street and Clinton Street corridors. These areas are critical thoroughfares for all modes of travel and intersect with the newly proposed shared use path/overlook as well as the Creekwalk and many neighborhoods. In addition, the Bear Street bridge over Onondaga Creek should receive major aesthetic improvements accomplished through the reconstruction. This should include a shared-use path similar to Hiawatha Boulevard.
- R 9-55: The proposed sidewalk along Bear Street and North Clinton Street addresses identified pedestrian needs while minimizing right of way acquisitions and impacts to adjacent properties. A cycle track/shared use path along the entire Bear Street and North Clinton Street corridors would require additional right of way acquisitions with associated impacts to adjacent properties. This work is beyond the scope of the I-81 Viaduct Project. The Project's proposed sidewalks along Bear Street from I-690 to BL 81 and North Clinton Street from Bear Street to North Franklin Street would not preclude future construction of additional pedestrian and bicycle facilities. Rehabilitation of the Bear Street bridge over the Barge Canal is being progressed as a separate NYSDOT project under PIN 310425. Aesthetic improvements will be considered during the project development phases of that project.
- C 9-56: The DEIS proposes cyclist and pedestrian accommodations on Almond Street that present numerous safety concerns. NYSDOT must utilize continuous physically separated cycle tracks or continuous physically separated bike lanes, wider crosswalks, and green MMA (methyl methacrylate) markings at crossings to allow cyclists a safer, protected crossing.
- R 9-56: Cyclists would be prohibited on BL 81 freeway sections. One-way cycle tracks would be implemented along Almond Street in both directions to just north of Erie Boulevard where they would transition to an on-road bike lane.
- C 9-57: NYSDOT must implement sharrows and a physically protected cyclist track/shared-use path on MLK, Jr. East past Leon Street to the project limit. To implement this improvement, NYSDOT should limit travel lane widths to 10 feet in this corridor or 11 feet if heavy truck and bus volumes justify wider lanes.

- R 9-57: As shown in Appendix A-1, the proposed shared use path would continue on MLK, Jr. East to Leon Street. At Leon Street, shared bicycle/vehicle paths (sharrows) would be implemented to provide for a safe transition for cyclists.
- C 9-58: NYSDOT must revise its proposal to provide a physically protected cycle track/shared use path for the entirety of the multi-block reconstruction of Harrison Street from Salina Street to Irving Avenue, and on Adams Street from Almond Street to State Street.
- R 9-58: NYSDOT originally proposed a bicycle facility on Harrison Street all the way to Salina Street, but this was modified after discussion with the City, which said it preferred the use of the space for parking spaces. However, NYSDOT could work with the City to determine the reconfiguration of Adams Street, as well as the areas between the curb lines and highway boundaries, to accommodate bicycle facilities as appropriate during final design.
- C 9-59: The DEIS includes the proposed construction of a physically protected cycle track/shared use path from Teall Avenue to Beech Street. NYSDOT must implement a similar design throughout the entirety of the reconstructed areas of Erie Boulevard between Crouse Avenue to Salina Street.
- R 9-59: As noted in **Section 5.6.2** of the DDR/DEIS and FDR/FEIS, the Project would provide various connections to the Empire State Trail, which is parallel to Erie Boulevard on Water Street.
- C 9-60: NYSDOT must explore alternative designs that offer greater ADA accessibility for pedestrians. Diagonal curb ramps, as proposed in the DEIS, are not preferred by the City or the FHWA (Best Practices Design Guide) and should be used only as a last resort. Likewise, sidewalks should continue unbroken through all driveway openings with constant material and width. The final EIS should utilize no sidewalk designs which dip or require transitions, and instead incorporate aprons for all grade changes and utilize NYSDOT Type 2 driveways or similar.
- R 9-60: Curb ramp types, locations, and sidewalk details through driveways will be determined during the project's final design phase. The City of Syracuse's preferences for continuing sidewalks through driveway openings and limiting use of diagonal curb ramps will be considered at that time.
- C 9-61: NYSDOT must implement continuous fixed vertical objects such as pinned jersey barriers and bollards to prevent motor vehicles from mounting or entering designated pedestrian and bicyclist spaces on Brighton Avenue. We also request that the NYSDOT continue pedestrian and cyclist accommodations to more logical terminuses to the north and south, from Lafayette Road to Thurber Street or Salina Street.
- R 9-61: The use of vertical fixed objects will be considered further in final design where appropriate and feasible. NYSDOT's design would not preclude the City from implementing future bike improvements along the Brighton Avenue corridor.

- C 9-62: The DEIS proposes a new shared-use path along Fineview Place that terminates at Raynor Avenue, one that travels along the rear of the Campus West apartments at a significantly lower elevation and with an unintuitive termination point. NYSDOT must redesign this path to interact with Syracuse University campus buildings in a more meaningful way by continuing the shared-use path to a more logical terminus such as Stadium Place or Campus Drive.
- R 9-62: The Project would not preclude the City or others from extending the path eastward toward the campus.
- C 9-63: NYSDOT proposes to reconstruct Catherine Street with on-road bike lanes. However, the proposed transition from separated cycle tracks to on-road facilities introduces unnecessary complexity to the curb line and road striping while providing significantly less safety to cyclists. NYSDOT should install new curbing to restrict vehicle travel lanes to a width of 11 feet to protect cycle tracks on both sides of Catherine Street next to the sidewalks.
- R 9-63: Curbing along Catherine Street between the proposed travel lane and on-road bicycle facility will be considered consistent with the City's vision for the street and the Project's needs and objectives during the Project's final design phase.
- C 9-64: The DEIS does not incorporate cyclist accommodations along any of the new or rebuilt sections of Pearl Street. NYSDOT must provide a physically separated cycle track or shared-use path along all new or rebuilt sections of Pearl Street with green MMA markings at crossings.
- R 9-64: The Project would not provide bicycle accommodations at either Pearl Street or Oswego Boulevard because of these streets' proximity to the proposed ramps. Bicycle facilities at those intersections would not be compatible with travel volumes or movements.
- C 9-65: The DEIS does not incorporate cyclist accommodations along James Street and proposes reduced sidewalk widths of 5 feet. NYSDOT must provide a physically separated cycle track or shared-use path along all areas of the rebuilt James Street, green MMA markings at crossings, and sidewalks with a width of at least 8 feet and incorporated buffer and snow storage areas.
- R 9-65: Detailed design plans for James Street will be developed during the project's final design phases. These design plans will consider existing and proposed roadside features along the James Street corridor. Design plans will be coordinated with the City before they are finalized, and prior to construction.
- C 9-66: NYSDOT must ensure that all sidewalks throughout the Central Business District have a minimum width of eight feet unless reasonable restricting factors are present; however, NYSDOT should ensure that curb adjacent sidewalks are no less than eight feet in width wherever reasonably possible.

- R 9-66: NYSDOT would work with the City during final design to develop the configuration of the alignment between the curb and the highway boundary.
- C 9-67: NYSDOT must include provision for parking accommodations for cyclists in its proposal, including staple-style racks along all new, rebuilt, or impacted areas. Two racks should be incorporated on each side of the street and located mid-block or at major destination points and should total approximately four per block.
- R 9-67: NYSDOT will collaborate with the City of Syracuse during the final design phases to locate bicycle racks.
- C 9-68: We request that the DEIS, on pages 3-37, 3-38, 3-39, 3-40, 3-42, incorporate the use of public art as a gateway feature and consider using murals, lighting, sculpture, monuments, landscape features, etc. as a gateway feature into the City at various points, including: Clinton Street, Oswego Street, Crouse Avenue, Irving Avenue, MLK Jr, West Street, Van Buren Street, Lodi Overlook, and along the Almond Street corridor. We also request that NYSDOT incorporate opportunities for public art installations into the design of the Community Grid, especially at entrances into districts/neighborhoods and at key intersections; and engage local artists to design site elements including lighting, paving and wayfinding and incorporate art into the final design of structures including bridges, underpasses, retaining walls, sound barriers, etc.
- R 9-68: **Chapter 5, Section 6-4-3, and Appendix F** of this FDR/FEIS discuss opportunities to incorporate public art and other gateway features in the Project. **Chapter 5 and Section 6-4-3** of this FDR/FEIS have been revised to include further consideration of public art for the Project. NYSDOT would continue to work with local stakeholders and the City of Syracuse for input on the design of site elements during final design.
- C 9-69: NYSDOT must coordinate with the City to identify sewer infrastructure that requires replacement or lining due to the age and condition of the system. NYSDOT must also clarify how it plans to apportion responsibility for repairing sewer breaks which occur during construction or as a result of construction.
- R 9-69: An initial assessment of sanitary sewer and other utility impacts is provided in **Appendix C-6** of the DDR/DEIS and FDR/FEIS. NYSDOT will continue working with the City of Syracuse to coordinate the identification of sanitary sewer and other municipally owned utilities that require relocation. Utility relocations will be performed according to federal and state laws including 23 CFR 645 and Highway Law Section 10. Accordingly, construction funds can be utilized to adjust, relocate, and replace municipally owned utilities when such work is necessary as a result of the proposed highway work.
- C 9-70: The DEIS states that the Community Grid will result in the removal of approximately five acres of road and highway pavement and lead to the creation of a number of "open areas" with stormwater runoff benefits. Some of these locations are within the highway right-of-way.

NYSDOT must clarify whether the five acres of new greenspace will be reserved as part of the NYSDOT's reduction runoff plan or whether it can be repurposed for development subject to certain restrictions.

- R 9-70: As stated in **Table 5-67** Note 2, "subsequent restoration of open areas as shown in **Figure 5-46** would be controlled so that no more than 35 percent of these areas would be constructed as an impervious surface." This threshold was established to ensure that future impervious surface area is the same or less than the existing impervious surface area; any increases in impervious surface area would require additional stormwater management requirements, such as storage of the water on-site. These areas are within the highway boundary; if determined to be surplus and available for re-development, they would be subject to this 35 percent threshold.
- C 9-71: NYSDOT must base hydraulic analysis of Onondaga Creek stormwater outfalls on the existing conditions of the creek and its existing capacity (with sediment and existing conditions of creek channel walls, banks, etc.). NYSDOT should complete this analysis as soon as possible to verify that the system works. NYSDOT must also demonstrate that there will be no adverse impacts to the creek including, but not limited to, erosion of soil and sediment along the creek bank and creek bed, change in creek capacity, and disruption of recreational use of the creek. NYSDOT must discuss maintenance of proposed facilities and best management practices with the City.
- R 9-71: NYSDOT will be responsible for maintaining the proposed stormwater drainage system and best management practices associated with all sections of BL 81. Stormwater systems along intersecting roadways will continue to be owned and maintained by the local or other governmental agency that currently has jurisdiction over those intersecting roadways and facilities.
- C 9-72: Given the excessive widenings planned for Almond Street, Irving Avenue, and South Crouse Avenue, NYSDOT's proposal may in fact diminish neighborhood cohesion at the expense of the City's property values. NYSDOT rationalizes proposed takings by noting that many of the proposed locations are currently underutilized; however, that is more reason not to devote them to overbuilt infrastructure than to productive use. To return more State land to taxable private use, NYSDOT should narrow proposed lane widths, narrow proposed rights-of-way, and reduce proposed takings in street corridors. To maximize assessed value of existing and future parcels, NYSDOT should reconnect more streets with a goal of creating more high-value street frontage for parcels, and generally minimize amount of land given over to public infrastructure. NYSDOT should also reduce the amount of space devoted to public infrastructure, minimize the need for takings, and maintain or enhance the City's existing inventory of taxable real estate.
- R 9-72: NYSDOT has designed the highway system taking into consideration the safety of the traveling public, including pedestrians and bicyclists, while minimizing the right-of-way necessary to build the Project. Throughout the entire development and design processes

NYSDOT has attempted to stay within the existing right of way boundary to avoid or minimize impacts to adjacent homeowners and businesses. The Community Grid Alternative would increase connectivity and not adversely affect neighborhood character. The Community Grid Alternative would result in approximately 10 to 12.5 acres of surplus property not needed for transportation purposes that could return land to the City's existing inventory of taxable real estate. As the Project progresses into the final design and construction phases, NYSDOT will continue to minimize the necessary work outside the right-of-way without compromising the safety of the transportation system. Regarding lane widths, refer to response to **Comment 4-71**.

- C 9-73: NYSDOT must build or rebuild all traffic with full connection to the Traffic Management Center ("TMC"), thereby ensuring equipment can be part of the TMC interconnect system. Considering the significant re-establishment and re-connection of the City's street grid, NYSDOT must implement a comprehensive traffic signal coordination evaluation and implementation throughout the project area, particularly in downtown Syracuse. This must go beyond the project limits and include the larger downtown traffic grid and adjacent neighborhoods.
- R 9-73: For impacted traffic signals that are replaced under the I-81 Viaduct Project, NYSDOT will coordinate with the City on integration with the TMC during the final design phases.
- C 9-74: NYSDOT must incorporate pedestrian signals (specifically, pedestrian countdown boxes) in any new or replaced traffic signal without compromise. All intersections are within an urbanized area and require pedestrian accommodations. Intersections designed without these features will be functionally obsolete and not accepted by the City of Syracuse.
- R 9-74: NYSDOT will continue collaboration with the City of Syracuse during all the design stages and will incorporate required functionality dependent on ownership of the signal.
- C 9-75: NYSDOT should remove the qualifying highway designation from the Almond Street corridor to ensure the community grid is used as a network of City streets, not as a highway. NYSDOT should also rework street widths to ensure that no travel lanes are wider than 11 feet for any street involved in this project and that the majority of streets conform to a preferred width of 10 feet. This is prudent, as a 12-foot travel lane does not support a 30 MPH design speed and is inappropriate in this context. We request that NYSDOT adopt a more appropriate roadway design with a 30 MPH maximum speed for all areas outside of the limited access highway.
- R 9-75: As explained in **Section 3.4.3**, BL 81 would be designated as a Qualifying Highway and designed with the physical characteristics to accommodate large, heavy vehicles along its length. These characteristics include appropriate horizontal and vertical alignments, lane widths (12 feet wide), turning radii, sight distance, and auxiliary lanes with acceleration/deceleration lanes of sufficient length and storage (see Design Criteria Tables in **Appendix C-6** for more information about design characteristics). All City street intersections would be designed to allow buses and SU-30 (single unit with three axles) trucks to turn at

them, and highway ramps would be designed to accommodate WB-67 (53-foot tractor trailer) trucks. Under the Community Grid Alternative, Qualifying Highways, including BL 81 and interstate system roadways, and designated truck access routes, including local roadways, are subject to change from the existing condition. These changes are identified in the Designation/De-Designation Package (contained in **Appendix B-5**).

- C 9-76: NYSDOT must clarify that all new pavement markings will be epoxy markings.
- R 9-76: NYSDOT commits to installing epoxy markings within the Project Area.
- C 9-77: NYSDOT must revise its designs so that no corners or curbing at rebuilt intersections exceed 15 feet in corner radii pursuant to NACTO standards. In addition, where exceptions to this dimension appear to be required, NYSDOT must first explore and document other interventions that allow for wide turning vehicles rather than larger corner radii, such as striping and stop bar locations.
- R 9-77: The corner radii have been developed to accommodate anticipated vehicle sizes consistent with the classification of the various streets and in accordance with the design criteria. However, NYSDOT will work with the City during final design in cases where adjustment may be feasible.
- C 9-78: NYSDOT must rework street widths to ensure that no travel lanes are wider than 11 feet for any street involved in this project and that the majority of streets conform to a preferred width of 10 feet. This is prudent, as a 12-foot travel lane does not support a 30 MPH design speed and is inappropriate in this context.
- R 9-78: See response to **Comment 4-43**.
- C 9-79: The DEIS proposal for the Almond and Genesee Street intersection includes a multi-lane intersection with multiple splitter islands, medians, and dedicated turning lanes; this would change the landscape of Forman Park and existing streetscapes to accommodate multi-lane intersection and fundamentally change the existing neighborhood gateway that was purposefully designed as part of the Connective Corridor project. NYSDOT must reduce intersection complexity by (i) eliminating the Almond Street northbound and Genesee Street eastbound slip lanes and islands, (ii) combining turning and through lanes to reduce complexity, (iii) reducing travel lane widths to no greater than 11 feet, and (iv) reducing intersection complexity and size to limit the project's impact on the park space and existing streetscape.
- R 9-79: The Project would not impact the boundary of Forman Park. The Project would remove the slip road on the west end of the park that connects Jefferson Street with Genesee Street and turn it into greenspace. Lane widths would not be changed as they need to meet the design criteria (see response to **Comment 4-43**. All other details could be discussed with the City in final design.

- C 9-80: On the proposed BL 81 off ramp and Oswego Boulevard extension, NYSDOT must consolidate through and turning lanes and make travel lanes no wider than 11 feet to force motorists to slow down and reduce high speeds to no greater than 30 MPH.
- R 9-80: The width of travel lanes on BL 81 will be 12 feet wide with a posted speed limit of 30 mph in the downtown sections. The traffic evaluation completed for this project determined the necessary lanes required for safe and efficient movement of vehicles through the corridor.
- C 9-81: Instead of the Hickory/Pearl southbound travel lane operating a turn-only lane with a right-angle curb line, as proposed in the DEIS, NYSDOT must taper the curb line or utilize curvature at this location.
- R 9-81: The design has been modified so that the curb line is now curved, and the plans in **Appendix A-1** have been updated to reflect this change.
- C 9-82: On new and rebuilt sections of Clinton Street, NYSDOT must provide minimum eight-foot-wide sidewalks with matching or similar snow storage buffer along all areas, as is typical for other areas of the Project. NYSDOT should also provide a physically separated cycle track or shared-use path along all areas of the new or rebuilt Clinton Street and provide green MMA markings at crossings.
- R 9-82: The proposed five-foot-wide sidewalks along Clinton Street would address identified pedestrian needs while minimizing right-of-way acquisition from adjacent property owners. Wider sidewalks and buffers spaces were provided when feasible, while the standard five-foot width was used when right-of-way was not available, as is this the case on Clinton Street. City Both off-road protected facilities and on-road bicycle lanes were incorporated into the Project where the right-of-way was available. In cases where right-of-way was unavailable and the streets were low volume, shared lanes were proposed.
- C 9-83: Instead of stopping the reconstruction of Division Street West mid-block, NYSDOT should continue reconstruction to more logical terminus such as the closest intersecting street and provide 6-foot minimum sidewalks between Division Street and Solar Street.
- R 9-83: The Project includes improvements to North Clinton Street, where continuous sidewalks and logical termini goals are met. For the many streets that intersect with North Clinton Street, such as Division Street, the Project includes the intersection work that is necessary to blend the North Clinton Street work into the intersecting street. Extending the work to parallel streets such as Solar Street is not needed as part of the Project.
- C 9-84: The DEIS contains no discussion on maintenance responsibility for landscape improvements. We request that NYSDOT re-negotiate its maintenance agreement with the City, given the significant lawn and tree plantings that are planned in connection with this project. The City's previous maintenance agreement is inadequate in light of current operation costs. We request

that any future agreement be appropriately sized and include tree maintenance and grass in the cost estimates.

- R 9-84: During final design, NYSDOT would coordinate with the City of Syracuse and appropriate stakeholders regarding landscape development and other aesthetic improvements for the Project. As per New York State Highway Law Section 46, the State shall maintain and have jurisdiction over the pavement area of the highway. Maintenance of elements outside the pavement area, including sidewalks, would be the responsibility of the municipality. Maintenance of additional site elements beyond sidewalks, including, but not limited to, landscaping, vegetated median, lighting, sculpture, and other forms of public art, would also be the responsibility of the municipality. These elements would be constructed pursuant to a maintenance agreement between the State and municipality.

Revisions have been made to **Chapter 5 (Section 5.6.4)** to include discussion of maintenance responsibilities of landscape and aesthetic improvements.

- C 9-85: The DEIS indicates NYSDOT's proposal for extensive tree planting along the boulevard and all impacted intersections. We request that NYSDOT provide clarification on design standards related to soil quality, condition, and preparation prior to tree planting. The DEIS should be revised to incorporate soil amendment, soil replacement, minimum rooting volume per tree, and use of structural soils under sidewalks to minimize root and hardscape conflicts. All of these components are critical for ensuring success of trees. NYSDOT should consult with the City to implement design standards for soil quality and depth, soil amendment practices, minimum soil volume per tree, use of CU soil under sidewalks to mitigate root and hardscape conflict.

- R 9-85: Tree planting details and specifications would be determined during final design. NYSDOT has standard specifications (New York State Department of Transportation Standard Specifications (USC) January 1, 2022 Section 611 – Planting, Transplanting and Post Planting Care) and Standard Sheets (611 Planting – Landscape Planting Details) pertaining to tree planting, as well as a special specification for Structural Soil Mix (Item 610.14000011), which would be considered in urban tree planting locations under sidewalks. NYSDOT would consult with the City to implement design standards for soil quality and depth, soil amendment practices, minimum soil volume per tree, and use of CU soil under sidewalks to mitigate root and hardscape conflict during final design. Refer to **Section 6-4-8** for discussion on tree planting.

- C 9-86: We request that NYSDOT consult with the City regarding suitable species choices for proposed plantings along the boulevard and other impacted areas. The City will provide a species palette for NYSDOT designers to consider for the boulevard based on trees' tolerance to various site conditions, susceptibility of species to pests and disease and species diversity goals to minimize pest and disease impacts on the trees.

- R 9-86: During final design, NYSDOT would coordinate with the City of Syracuse and consider the City's input regarding planting species within the City limits and a desired species palette for planting.
- C 9-87: We request that NYSDOT increase the buffer width from that proposed in **Figure 3-38** and **GP-CG-H10-03** (at locations adjacent to MLK School and plant a 50 percent conifer mix—specifically Hemlock, Juniper, Northern White Cedar and White Pine. These species are shown to be the most effective at capturing and retaining particulate matter and the conifers will abate noise and air pollution in the winter. In comparison, deciduous trees will not be nearly as effective in the winter. We also request that NYSDOT build a service road to facilitate access and maintenance within the buffer and use a buffer planting mix distinctly different from the boulevard planting species list. Because these are grown in open soils farther from the road, NYSDOT should utilize an exclusively native planting mix at this site.
- R 9-87: **Figure 3-38** in **Chapter 3** of the DDR/DEIS and FDR/FEIS is conceptual and representative of design intent and the preliminary layout of site elements, which would be refined during final design. During final design, NYSDOT would coordinate with the City of Syracuse and consider the City's input regarding planting species within the City limits, a desired species palette for planting, and maintenance access. Planting details and specifications, including planting soil, would be determined during final design.
- C 9-88: The DEIS demonstrates the scale of planting proposed along the boulevard in areas that are currently low canopy, low income, tree equity areas in the City. While this mitigation of trees helps address that issue, soil quality, soil volumes per tree, and root conflicts with sidewalks are not addressed. These issues must be addressed to ensure trees reach the size proposed in concepts. The City proposes (1) a minimum of 1,050 cubic feet per tree (35' x 10' x 3' deep rooting area). This rooting volume will ensure trees reach maturity and allows for a 35-foot spacing between trees. This slightly closer spacing will discourage lower branching as the trees mature. (2) All tree lawns should have well drained (S-series) soils installed in a continuous trench to a 3-foot depth as the best mitigation for road salt is soil that drains well. Stone, concrete and debris on-site that is between sidewalk and curb after they are installed cannot be allowed to remain. Trees cannot grow in this substrate. (3) To simultaneously achieve soil volumes per tree and mitigate future sidewalk heaving from tree roots, CU structural soil should be installed along the entire length of the sidewalks to be lined with trees. This should be done everywhere in the community grid footprint to allow trees to reach the size proposed in the concepts. (4) To address stability concerns related to sidewalks of curb and sidewalk, CU structural soil can be installed in the tree lawn and under the sidewalk, then the top 18 inches may be removed in the tree lawn and replaced with S Series soil prior to planting.
- R 9-88: Plantings will be discussed with the City during final design.
- C 9-89: NYSDOT should also (1) minimize planting of Elm Allee plantings (perhaps to one block) as hybrid elms "resistant" to Dutch elm disease and elm yellows can still succumb to those

diseases, and elms are also very prone to a variety of pest issues; and (2) break up oak plantings. The NYSDEC Forest Health group does not recommend planting too many oaks adjacent to each other as roots graft and spread disease. NYSDOT should maximize diversity of boulevard plantings and have center lane plantings that are different from the east and west sides of the boulevard. The guide recommended urban trees produced by the Urban Horticulture Institute at Cornell should be used to determine which species have the necessary tolerances to urban conditions, especially soil pH, moisture tolerance and success in structural soils.

- R 9-89: During final design, NYSDOT would coordinate with the City of Syracuse regarding planting species and specifications and would determine planting species in consideration of the City's input.
- C 9-90: The DEIS indicates that the cost to relocate all municipally owned utilities would be fully reimbursable. However, these sections of the DEIS do not address utilities that are not being relocated but may be impacted by construction activities due to the age and/or condition of the utility. Due to the age and condition of City infrastructure, NYSDOT should consider replacement of utilities beyond instances where relocation is required. Experience has shown that limited relocation and the connection to an existing aged system often results in failure at that location or just outside the new construction, resulting in re-work and/or costly repairs. Also, excavating near aging infrastructure can cause collapse or breaking of aging infrastructure during construction or shortly thereafter. There is a "Dig Once" benefit with respect to replacing aging utilities which the NYSDOT should consider. The City cannot afford to replace all of the aging infrastructure impacted by this project within the project area without substantial economic hardship
- R 9-90: Those utilities that are impacted as a result of the Project could be reimbursed consistent with applicable laws and regulations. In areas where the utilities are not impacted, the City could work through the betterment process to upgrade their utilities while the work is occurring. NYSDOT will continue to collaborate with the City and all affected utility operators as the design progresses and prior to construction.
- C 9-91: NYSDOT must coordinate with the City to identify water infrastructure that requires replacement or lining due to the age and condition of the system and provide funding for replacement and/or improvement of this infrastructure. NYSDOT must also clarify how it plans to apportion responsibility for repairing water main breaks which occur during construction or as a result of construction. NYSDOT must also provide alternate water supply to impacted properties during any disruption greater than 24 hours in duration.
- R 9-91: Replacements would be limited to those portions of the water infrastructure that would be impacted by the Project. Work would be done to avoid or minimize service disruptions. If a break occurs for which the contractor is determined to be liable, the contractor would be responsible for its repair.

- C 9-92: NYSDOT must modify its Brighton Avenue bridge reconstruction plans to include replacement of the two water supply mains currently located at the bridge.
- R 9-92: NYSDOT is aware of the two water mains along Brighton Avenue and the need to keep those lines in service during construction. Details would be worked out during final design as needed.
- C 9-93: NYSDOT must replace the 24-inch water main on Hiawatha Boulevard.
- R 9-93: The 24-inch water main is about 130 feet south of the Hiawatha Boulevard Bridge under I-81, which would be widened under both alternatives. If the water main is impacted, it would be replaced; otherwise, replacement would require a betterment from the City.
- C 9-94: Table 6-11-1 of the DEIS [in Appendix C-6] identifies several water mains as "OCWA" which are actually owned by City. NYSDOT must work with the City Water Department to correct Table 6-11-1 and to create a plan for ensuring that water mains are replaced and in service before old mains are decommissioned.
- R 9-94: NYSDOT will continue to meet with the City water department to clarify ownership as design progresses.
- C 9-95: Considering the significant re-establishment and re-connection of the City's street grid, NYSDOT must develop a robust and comprehensive wayfinding program for all users. This includes vehicular wayfinding signage at gateways (Clinton, Oswego, Crouse, Irving, MLK Jr., West, Van Buren, Clinton, Bear, Almond St, etc.) and pedestrian and bicyclist wayfinding signage throughout the City. The DEIS acknowledges potential opportunities to redevelop surplus rights-of-way and enhance the connectivity and walkability and bikeability of the re-established street grid, and NYSDOT must consider implementing permanent wayfinding signs and maps, including digital kiosk-style services, to help rebrand impacted neighborhoods and districts once construction is complete and direct pedestrians and cyclists who are using the re-established street grid to access business districts and amenities.
- R 9-95: NYSDOT will work with the City on wayfinding details during final design; however, digital kiosks are not anticipated.

9-2 SYRACUSE HOUSING AUTHORITY

- C 9-96: The Syracuse Housing Authority (SHA) has reviewed the DEIS and the environmental justice (EJ) analysis prepared for the I-81 Viaduct Project. SHA is in support of the community grid alternative but has some concerns regarding the impact that the construction phase of the project will have on our residents, our operations, and our employees.
- SHA residents are part of an environmental justice population and therefore NYSDOT must demonstrate that SHA residents would not be subjected to a disproportionality high level of adverse effects, in accordance with the provisions of Executive Order 12898 and FHWA Order

6640.23. NYSDOT must assist the over 500 residents in Pioneer Homes immediately adjacent to the viaduct and 300 residents in Toomey Abbott Towers by addressing how these residents can anticipate and receive help with the health impacts they may encounter throughout the project.

SHA has provided a report, "I-81 Construction Health Impacts: Recommendations for Syracuse Housing Authority," and drafted with the SUNY Upstate Medical University (UMU) Working Group that delineates SHA's recommendations for pre-construction, construction, and post construction of the I-81 Viaduct Project. In addition, based on input from residents and the community SHA is also seeking voluntary housing vouchers for residents and 130 units of replacement housing to protect the health and well-being of SHA residents during the construction of I-81 Viaduct Project.

R 9-96: Comment noted. As discussed in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, it was determined that the adverse effects associated with the Community Grid Alternative would not be predominately borne by or appreciably more severe to the environmental justice communities and the beneficial and adverse effects of the Community Grid Alternative would be fairly distributed within the affected environmental justice and non-environmental justice communities. Regarding relocations, construction of the Preferred Alternative would not require the relocation of residents.

C 9-97: SUNY UMU's recommendations relate to preventing, minimizing, monitoring, assessing, and if needed, treating, any health conditions that could arise or worsen for the SHA residents of Toomey Abbott Towers and Pioneer Homes affected by the planned I-81 deconstruction and construction project.

Possible health risks identified include displacement of local residents from their homes and community; exclusion of local community members from planning and implementation; respiratory issues; audiology – noise effects; sensory – vibration effects; exposure to toxic substances – e.g., lead; accidental injuries; mental health issues; access to services; disruption of medical care due to proximity of construction to UMU; and lack of adequate resources to ensure the health of the community.

NYSDOT must consider the following major health components of the construction project.

- Air Pollution and Particulate Matter (Respiratory issues): Construction activities are major contributors to dust pollution due to the usage of raw materials like sand, silt, cement, concrete, sawdust, etc. and activities like excavation, drilling, bulk material transportation, loading and unloading, open-air material storage, concrete and mortar making, cutting and filling, and the movement of equipment. If unattended, particulate pollution is bound to surpassingly increase having greater health implications on laborers and workers at these sites, and in this case, residents living nearby.
- Noise Pollution (Audiology issues): Noise pollution can cause harmful effects on human health. Various studies have shown that approximately sixteen percent of worldwide disabling hearing loss was due to occupational noise. Noises can occur from machinery or construction such as piling, welding, knocking, hammering and material transportation.

- Vibration (Sensory-Vibration effects): Exposure to excessive vibrations can cause health risks to workers and to the community members in the immediate area. Use of anti-vibration products should be considered (rollers, dampers, rubber compounds, etc...).
- Impact on Mental Health and Well-being of Residents: The mental health needs of the community residents during construction need to be considered especially in a vulnerable population, who rely on walking and public transportation. The stress of daily living near a construction site and the potential disruption of access to vital services also need to be considered.

DEIS Table 4-7 titled "Measures to Minimize Community Impacts" does an adequate job of assessing the critical technical areas that need to be considered throughout deconstruction and construction of the project but does not address how to help residents with the health impacts they may encounter throughout the project. NYSDOT should seriously consider the additional recommendation of the SUNY UMU experts to address these issues.

R 9-97: Comment noted. Please see responses below.

INITIATIVES FOR PRE-CONSTRUCTION PHASE

C 9-98: NYSDOT should perform a Pre-Construction Phase Health Impact Assessment (HIA), the purpose of which would be to determine the current (baseline) health status/needs of the community. The estimated cost of an HIA pre-construction assessment ranges between \$10k to \$200k, and possibly more depending on the scope. NYSDOT should plan to collaborate with Onondaga County Health Department for existing data (e.g., Onondaga County Health Assessment and Improvement Plan); give specific considerations given to children, elderly, and disabled who might be more at-risk of health impacts from construction; and focus on environmental justice and equitability

R 9-98: **Sections 6-4-4, 6-4-6, 6-4-9, and 6-4-10** of the DDR/DEIS and FDR/FEIS present the assessment of potential effects related to air quality, noise, lead and asbestos, and contaminated materials, respectively, resulting from implementation of the Project. **Section 6-2-3** of the DDR/DEIS and FDR/FEIS presents the assessment of the potential for disproportionately high and adverse effects to environmental justice populations resulting from the Project, including effects from changes in air quality, noise, and exposure to asbestos, lead, and contaminated materials during construction and once the Project is operational.

As documented in the DDR/DEIS and FDR/FEIS, a particulate matter (PM) microscale analysis was conducted for the Project using NYSDOT, FHWA, and U.S. Environmental Protection Agency (USEPA) procedures and was performed using the USEPA emissions model MOVES2014a and dispersion model CAL3QHCR. Three and four sites were selected for the particulate matter microscale analysis for the Viaduct and Community Grid Alternatives, respectively, and multiple receptors were modeled at each of the selected sites. Sites were selected for analysis based on projected traffic conditions, the introduction of new/modified roadways, and the proximity to sensitive receptors. The sites are located within environmental justice communities. Both particulate matter less than or equal to 2.5 micrometers (PM_{2.5}) and PM less than or equal to 10 micrometers (PM₁₀) were modeled. At the analysis locations,

PM_{2.5} and PM₁₀ concentrations would be below the National Ambient Air Quality Standards (NAAQS), which were established by the Clean Air Act to protect human health and welfare, including the health of sensitive populations, such as asthmatics, children, and the elderly.

An air quality analysis for construction activity was also conducted. The MLK, Jr. East area, which is within an environmental justice community, was selected as a representative location for the analysis. Both emissions from on-site construction equipment and emissions from construction-related traffic diversions were included in the analysis. While construction activities would temporarily generate emissions from equipment and fugitive dust from ground disturbance, the maximum predicted PM_{2.5} and PM₁₀ concentrations would be lower than the applicable NAAQS. Adverse effects related to air quality are not anticipated as a result of the Project. A health analysis is not required or warranted.

C 9-99: NYSDOT must revise the proposed roundabout, while an improvement over the prior plans, is still too close to STEAM at Dr. King elementary school, in contradiction to USEPA guidelines regarding distance from schools (>600 feet). NYSDOT must also ensure adequate safe access to community grid from all areas of the neighborhood by including walkable access and roadway crossings for certain areas.

R 9-99: As described in **Chapter 3** of this FDR/FEIS, based on public input received during the DDR/DEIS public comment period, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East in the vicinity of Dr. King Elementary School as part of the Community Grid Alternative. By eliminating the roundabout in this location, the proposed transportation system (and associated construction activities) would be moved as far away as practicable from the school. The duration of construction in this area would also be reduced.

NYSDOT would continue to coordinate with the Syracuse City School District during construction. During final design, NYSDOT would consider implementing additional construction restrictions within the construction zone near Dr. King Elementary School, such as time and/or seasonal restrictions where appropriate. **Sections 6-2-1** and **6-2-3** of this FDR/FEIS have been revised to reflect this.

Regarding walkability, the Community Grid Alternative would provide safe and walkable access and roadway crossings from the Southside to surrounding areas.

C 9-100: NYSDOT must establish heavy equipment guidelines, to include independent monitoring guidelines for the construction phase; an upgraded list of controls; incorporate Prevention through Design & Planning principles to address relevant health exposure risk to community and workers; and include Best Available Technologies to remove source exposures such as quiet equipment, dust-less processes, etc.

R 9-100: To help minimize and mitigate the adverse effects of construction activities on the community, NYSDOT would require its contractors to comply with measures to minimize or otherwise mitigate effects, as listed in **Table 4-7**. The list includes measures to address traffic diversions, dust and debris, increases in emissions and noise, access to businesses and residences, and

community engagement. Cumulatively, these measures would help address adverse effects during the construction period. These measures could incorporate Prevention through Design & Planning principles and best available technologies.

- C 9-101: NYSDOT must perform resident focus groups and/or surveys (estimated cost: \$4k–\$12k), to include facilitated discussions at each impacted housing establishment; focus groups that occur prior to the distribution of a health survey; concern for overburdening residents with too many surveys, etc. with assurance that their needs and concerns are addressed; determining the best methods for community/resident input into construction process and outcomes and community health; and developing an environmental health registry with community input (to monitor short- and long-term health issues and facilitate access to health services).
- R 9-101: While a health survey and an environmental health registry are beyond the scope of the Project, NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan with NYSDOT's review and approval, the specifics cannot be stated at this time; however, focus groups may be included if deemed necessary. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation.
- C 9-102: NYSDOT must provide educational sessions for residents (estimated cost: \$3k), to inform them about what to do if a health issue occurs and what their rights related to construction period activities may be.
- R 9-102: Educational sessions for residents are beyond the scope of the Project. However, the Contractor will keep the community up-to-date on ongoing construction activities.

INITIATIVES DURING ACTIVE CONSTRUCTION PHASE

- C 9-103: NYSDOT must provide access to health services (estimated cost: \$1 million), to include the following:
- Development of an on-site health clinic at Toomey Abbot Towers staffed by experts to provide prompt virtual and in person care. This would be a full-service clinic with physicians, APPs, nurses, respiratory therapist to run a spirometer (~\$2,000) along with the project coordinators and community navigators. Services should include primary care, pulmonary care, audiology services, and occupational health.
 - Ensured access to UMU and other health-related services that would remain available and easily accessible during the project.
 - Continue to monitor and assess residents' health (see environmental health registry, below).
- R 9-103: The above requests are beyond the scope of the Project. A comprehensive analysis of potential impacts during construction was conducted. As presented in the DDR/DEIS and FDR/FEIS, no adverse noise or air quality impacts were identified.

C 9-104: NYSDOT must provide access to mental health resources, making available mental health resources in an on-site health clinic and a phone hotline for mental health concerns.

R 9-104: The above request is beyond the scope of the Project.

C 9-105: NYSDOT must provide educational sessions for residents (estimated cost: \$3k), to include information on how to avoid specific health issues, e.g. remove shoes in home to avoid tracking lead into the house; what to do if a health issue occurs; and residents' rights related to the construction.

R 9-105: The above request is beyond the scope of the Project.

C 9-106: NYSDOT must maintain stringent adherence to construction and health controls and perform independent monitoring measures that include the ability to halt construction if thresholds are exceeded.

R 9-106: NYSDOT will oversee the Contractor to ensure compliance with all construction and health protocols. During construction, NYSDOT will implement noise and air quality monitoring, and work would be halted in the event of any threshold exceedances.

C 9-107: NYSDOT must provide air quality monitoring and safety measures; estimated costs include the following: \$300 per handheld spirometer unit, up to \$10,000 plus operating costs for stationary, highly accurate unit; \$1,000 per 100 flow meters; \$250 per AirBeam device, with possible additional cost if phones are needed; and \$9,000–\$15,000 per PM 2.5 (fine particulate matter) monitoring instruments suitable for indoor and outdoor use, with annual calibration costs of \$800.

NYSDOT must supply air filtration systems including air conditioning units in SHA homes and buildings; air quality monitoring system in and near residents' homes; possibly connected to their phone app; handheld spirometers for residents; peak flow meters for residents; air quality/particulate matter devices suitable for residents and community members that measure PM2.5 (fine particulate matter) in units of micrograms/cubic meter.

Recommended is the AirBeam (www.habitatmap.org), developed for participatory community air monitoring and probably the most applicable device. It fits in a pocket or backpack, can be set up indoors or outdoors for in-home or mobile monitoring. It is used with an Android phone and the AirCasting App. Measurements are recorded and mapped in real time and synched to the cloud where they can be viewed at the AirCasting.org website. Results are compared with a color-coded scale EPA has developed to indicate health risks. The device is \$250. If phones are needed, that is an additional cost.

In addition, NYSDOT must give specific attention to STEAM at MLK School and Wilson Park to protect children and other vulnerable populations.

R 9-107: Outdoor ambient air quality monitoring would occur during construction. While the suggestions in the second paragraph of the comment are beyond the scope of the Project, as stated in

Chapter 4 (Table 4-7), Section 6-2-3, and Section 6-4-4 of this FDR/FEIS, an outdoor ambient air quality monitoring program would be implemented during construction of the Project and would be overseen by NYSDOT. The program would consist of real-time particulate monitoring at a number of locations within the local community, including locations within the environmental justice community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design. NYSDOT will coordinate with the Dr. King Elementary School and Syracuse School District during construction. Background particulate monitoring would be conducted as part of the program to establish and routinely verify baseline levels. During construction, real-time particulate matter data would be collected at an established interval (for example, measurements every 10 seconds and logged in 15-minute periods) and time-weighted over 24 hours for comparison to the USEPA's National Ambient Air Quality Standards (NAAQS). These standards are designed to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly, with an adequate margin of safety. If the data show that air quality levels are approaching a concern level (to be established during final design) that could result in an exceedance of the 24-hour NAAQS, then operational and/or mechanical deficiencies would be identified and corrected. If the data result in any particulate air quality levels that exceed the 24-hour NAAQS, then the applicable construction activities would be suspended until the deficiencies are identified and corrected. The community particulate monitoring would be performed using real-time aerosol light-scattering equipment. Specific particulate monitoring equipment manufacturer and model would be determined during final design.

This FDR/FEIS has been revised to include the above information, including the commitment to locate a monitor outdoors in the vicinity of Dr. King Elementary School.

With respect to Wilson Park, as documented in **Section 6-4-2** and **Chapter 7** of the DDR/DEIS and FDR/FEIS, the eastern portion of the park (the area closest to the existing I-81 viaduct) is within the existing NYSDOT right-of-way. A portion of Wilson Park (0.12 acres) outside and adjacent to the right-of-way would be closed for less than a year during the construction period for the Community Grid Alternative to provide a safety buffer between the accessible portion of the park and the construction activities. The inaccessible portion of the park would not be used for construction staging. NYSDOT would require that the closed portion of the park be properly fenced off from the rest of the park and kept clean and safe. Please see response to **Comment 9-9** for further detail.

- C 9-108: NYSDOT must provide for sound monitoring and abatement (estimated cost: \$500-\$1k per monitor; \$5,000 for professional sound level meter with a yearly cost of \$500 for factory calibration, plus personnel costs for managing that program), to include sound-proofing windows; installing a sound monitoring system in and near residents' homes, possibly connected to their phone app.; and provision of meaningful noise abatement options to residents.

Note that professional sound level meters with good accuracy and sensitivity come at high cost and require maintenance, calibration, and training. Even low-cost, lower accuracy devices need the same. The most realistic approach to personal sound level measurements for residents or community members is through a smartphone and sound level meter apps. There are numerous, free, sound level apps that use the smartphone microphone and provide a reasonable screening tool for noise monitoring. Measurements would be stored only on the individual phone, not on servers as this is not a typical feature of the apps reviewed. There are different apps for IOS and Android phones including a NIOSH (National Institute for Occupational Safety and Health) app for IOS that is highly rated. Recommendations for the best apps for could be developed and some type of instruction or training provided for users.

NYSDOT must give specific attention to STEAM at Dr. King Elementary School and Wilson Park to protect children and other vulnerable populations.

- R 9-108: The Contractor will be responsible for monitoring noise levels during construction, and will be required to halt construction activities in the event of threshold exceedances. With respect to the Dr. King Elementary School and Wilson Park, please see responses to **Comments 9-9 and 9-107**.
- C 9-109: NYSDOT must ensure that strict control practices are in place when dealing with toxic substances and perform both environmental monitoring and active surveillance of nearby residents when appropriate. Such monitored substances include lead paint and lead in soil, including surveillance of blood lead levels of nearby residents, particularly children; asbestos hazards; silica; particulate matter; diesel exhaust; and hazardous waste (including legacy sites).
- R 9-109: Any demolition work that is completed will follow all Federal and State regulations. New York State has some of the most stringent regulations in the nation specifically when it comes to the abatement of asbestos containing materials, while lead paint regulations are typically governed by Federal laws and regulations. Soil, air, building material testing and personal monitoring will occur as required by the regulations. Project bid specifications and special environmental notes will be developed in the future during detailed design. Instructions to the Contractor will be contained in the proposal book that will include detailed specifications, special notes, drawings, and other references that describe expected practices and techniques, the content to be included in the Lead Exposure Control Plan and other environmental activities and the oversight/testing process.
- C 9-110: NYSDOT must develop an independent and confidential reporting process for residents' health issues, such as an environmental health registry, to include a standardized mechanism for SHA residents to report construction-related health issues; guidelines for what residents should do if they experience construction-related health issues; and safeguards to ensure resident health information is kept private.
- R 9-110: The above requests are beyond the scope of the Project.

- C 9-111: NYSDOT must ensure economic opportunity is available to residents of the community as this is a major determinant of health, with new jobs with the project being primarily available to local residents.
- R 9-111: NYSDOT is committed to local training and hiring initiatives during construction; see response to **Comment 9-336**.
- C 9-112: NYSDOT must develop a method for communicating site compliance with hazard controls, effectiveness, and planned changes to control procedures to all interested parties and address transparency concerns.
- NYSDOT must develop a mechanism for handling complaints / inquires / rumors from the community, workforce, etc., while addressing transparency concerns and assuming the ombudsman's role to resolve problems as needed
- R 9-112: NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan with NYSDOT's review and approval, the specifics cannot be stated at this time; however, a Project hotline for handling complaints and responding to community questions would be in place. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation.

INITIATIVES FOR POST-CONSTRUCTION PHASE

- C 9-113: NYSDOT must implement a post-construction HIA (estimated cost:\$10k–\$200k, possibly more depending on scope), to include a focus on environmental justice and equitability and continued monitoring and assessing of residents' health, while identifying possible unanticipated effects of construction (environmental health registry).
- R 9-113: A pre- or post-construction HIA is beyond the scope of the Project.
- C 9-114: NYSDOT must ensure economic opportunity is available to residents of the community and see that new jobs arising from new business are primarily available to local residents.
- R 9-114: Local hiring practices are outside the purview of NYSDOT.
- C 9-115: NYSDOT must ensure continued access to physical and mental health services (estimated cost: \$500k), to include the continued operation of the health clinic in the Toomey Abbott building, based on residents' needs.
- R 9-115: As stated above, these requests are beyond the scope of the Project.

9-3 DOWNTOWN COMMITTEE OF SYRACUSE

- C 9-116: The Downtown Committee of Syracuse supports the Community Grid because it's the best solution to continue downtown's forward trajectory. The Grid creates opportunities to move people into our city center, provides more economic opportunity and jobs, and leads to further investment in property and new tax resources. More than \$800 million has been invested here, in downtown since 2010, reflecting the work of dozens of developers, builders and investors who believe in a strong urban core, not to mention the hundreds of small businesses and 4,300 (and growing!) residents that now call downtown Syracuse home. The Community Grid also involves the least disruptive construction approach, displaces the fewest number of businesses and residents, and preserves historic structures, which have been a key component to cultivating our community's character. More than a decade of studies and public meetings have generated significant information and feedback to lead NYSDOT to recommend the Community Grid. We thank you for the thorough analysis and urge the continued forward movement of this project.
- R 9-116: As stated in **Section 8.3** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative has been identified as the Preferred Alternative for the I-81 Viaduct Project.
- C 9-117: NYSDOT should look at opportunities to shrink the footprint of Almond Street to create a more walkable urban corridor. The median width being proposed for Almond Street should be reviewed as the proposed width is not in keeping with the character or scale of downtown Syracuse roadways. Reduce the size of this median to create more developable land east and west of the roadway rather than creating more vacant, unusable space in the middle.
- R 9-117: NYSDOT will work with the City and appropriate stakeholders during the final design phases to refine the design of the areas of Almond Street outside the curblines, including widths of the medians and pedestrian refuge areas, cycle track, shared use lanes, and sidewalks, etc. The refinements to Almond Street would be designed to be consistent with the City's vision and the needs and objectives of the Project.
- C 9-118: We commend NYSDOT on the creation of a Community Redevelopment Commission and ask for more detail on how this local working group will oversee and guide redevelopment efforts. Successful community planning can only happen if it's being done "with" the community and not "for" the community. As such, we ask NYSDOT to empower this commission with decision-making capabilities to guide future planning for this area. Developed land should result in the creation of new jobs, new tax revenue, and provision of needed amenities.
- R 9-118: The Community Grid would result in approximately 10 to 12.5 acres of surplus property not needed for transportation purposes that could return developable land resulting in the creation of new jobs, new tax revenue, and provisions of needed amenities. Once NYSDOT disposes of excess land no longer needed for transportation purposes, the future use of each individual property falls outside the control of NYSDOT. The City of Syracuse is the authority that would

need to empower the working group with decision making capabilities that guide future land use.

- C 9-119: Raised cycle tracks are discussed within the DEIS. NYSDOT must commit to providing or funding regular maintenance and attention to any dedicated cycle tracks created. This includes daily plowing in winter months. The design must include areas for snow storage as well as take into consideration existing business services, such as trash set out and ability of haulers to access trash cans.
- R 9-119: The City of Syracuse would be responsible for maintaining and funding regular maintenance on cycle tracks and other amenities outside the highway curb line. NYSDOT provides operation and maintenance services for the highway transportation system inside the curb lines. Aesthetics such as trees and landscaping in raised medians would also be the responsibility of the City of Syracuse.
- C 9-120: As part of the I-81 project, continue working with Centro and community partners to improve mass transit options with bus service, scheduling, and a review of SMTC's "SMART-ONE" BRT study. Incorporate findings from this study into the Final EIS to reflect how mass transit can play a role in moving people to and between destinations to reduce the number of cars on the road. This will be necessary as central New York undergoes its largest road construction project to date. The timing is right to introduce mass transit as a viable opportunity to move people around the community. As part of this study, SMTC identified planned Park & Ride locations, and these alternative transportation options need to be considered as part of our overall transportation strategy to move people effectively during and after the I-81 project.
- R 9-120: A stated objective of the Project is to "maintain access to existing local bus service and enhance transit amenities within the Project limits in and near Downtown Syracuse." "Transit amenities" refers to bus stops and shelters, bus turnouts, and layover and turnaround places within the Project limits in and near Downtown Syracuse. As part of the development of the Viaduct and Community Grid Alternatives, NYSDOT will continue to coordinate with Centro on potential street improvements.
- While additional transit improvements are not part of the I-81 Viaduct Project, the Project would not preclude Centro or others from carrying out the transit improvements in the future, as separate, independent actions.
- C 9-121: NYSDOT must look further into its ability to incorporate design solutions to make it less attractive and convenient for tractor-trailer type traffic to utilize Almond Street, Salina Street, or the City street grid, unless drivers have a destination point or business to conduct in Downtown Syracuse. The proposed addition of a roundabout, which will maintain traffic flow, but may be less desirable for through trucks to navigate, would be a good solution. However, it must be located in an area that will not result in negative impacts on the neighborhood or its residents.

- R 9-121: The proposed de-designation of I-81 in Syracuse necessitates the identification of an alternate route that could accommodate truck traffic (Qualifying Highways). BL 81 would be designated as a Qualifying Highway and designed with the physical characteristics to accommodate large, heavy vehicles along its length. See Design Criteria Tables in **Appendix C-6** for more information about design characteristics.
- C 9-122: NYSDOT must set aside funding to conduct master planning work specific to the Canal District concept so it can be further developed with high levels of local community engagement.
- R 9-122: NYSDOT is committed to working with the various stakeholders to dispose of surplus right-of-way that will not be used for transportation purposes. NYSDOT will formulate the land use working group during final design prior to the start of the construction phases. Any additional funding is not related to transportation and thus not under the authority of NYSDOT. However, community outreach for the Canal District would be conducted during final design.
- C 9-123: Clinton Square is the center for cultural events in Syracuse. NYSDOT must consider the existing uses of this space and look for opportunities to divert traffic to roadways that may offer more existing yet underutilized capacity or multiple north-south roadways that do not experience the heavy festival and event uses that Clinton Street currently experiences.
- R 9-123: With respect to Clinton Square, the existing condition (with exits to Clinton and Salina Streets) puts traffic on both sides of Clinton Square. The proposed condition (with exits to Clinton Street and Oswego Boulevard) would move the one connection farther east, away from Clinton Square. It would also provide a better connection with East Willow Street, James Street, and Erie Boulevard, which in turn would provide improved connections to various other north-south City streets. NYSDOT will continue to work with the City of Syracuse on special events that change travel patterns and access into and from the City.
- C 9-124: In addition to dispersing traffic over multiple streets, NYSDOT must review the width and uses of nearby side streets within the Project Area to identify where sufficient capacity exists on side streets, and whether the width of side streets is sufficient to accommodate new, anticipated cars. If necessary, NYSDOT should remain open to the possibility of expanding the Project Area boundaries to ensure a comprehensive transportation network is being developed rather than solely looking at streets within a pre-defined geography.
- R 9-124: All City street intersections would be designed to allow buses and SU-30 (single unit with three axles) trucks to turn at them, and highway ramps would be designed to accommodate WB-67 (53-foot tractor trailer) trucks. Intersections at side streets with BL81 will be further evaluated during final design. The radii design will consider the functional classification of the intersecting street, as well as considering the needs of all the users, including pedestrians. An increase in a curbed radii or roadway width may result in an increase in crosswalk distances. While the "Project Area" depicts the physical limits of disturbance of the Project and includes areas where Project elements may be implemented, the Project's traffic "study area" is more

expansive and includes all areas that may experience traffic-related impacts and is sufficient to evaluate the effects of the Project on traffic operations.

C 9-125: NYSDOT must focus on traffic signal coordination and optimization and implement traffic light synchronization across both the City and NYSDOT systems, which are not yet coordinated, and provide technological and funding partnerships to make this possible. We urge NYSDOT to establish a command post where all the various functions can reside.

R 9-125: Coordination of signals will be included, as appropriate and will be detailed in final design. NYSDOT will continue to collaborate with the City of Syracuse to have the transportation system function at optimum efficiency.

C 9-126: NYSDOT needs to develop a Landscape and Environmental Enhancements and Maintenance Plan that reflects the realities of the local fiscal climate and abilities of municipal and other partners, and look at the landscape design, greenspaces and enhancements created with an eye toward maintenance and implement a low-cost maintenance planting plan. This includes working with the municipality and other local partners to develop a mutual agreement/plan for caring for these new spaces before landscape enhancements and streetscape improvements are built.

NYSDOT's plan should clearly define maintenance expectations, articulate the roles of each entity involved, incorporate local feedback of what is reasonable, and identify an annual budget (including sources and uses) and staffing plan. NYSDOT must therefore develop a dedicated fund to pay for the ongoing maintenance of these spaces (trees, planting beds, signage, bike racks, gateway signage) so that maintenance of these spaces is performed and their condition will reflect positively on the community. These funds should come from New York State and not push the burden onto local municipalities.

R 9-126: During final design, NYSDOT would coordinate with the City of Syracuse and appropriate stakeholders regarding landscape development and streetscape improvements for the Project. As per New York State Highway Law Section 46, the State shall maintain and have jurisdiction over the pavement area of the highway. Maintenance of elements outside the pavement area, including sidewalks, would be the responsibility of the municipality. Maintenance of additional site elements beyond sidewalks, including, but not limited to, landscaping, vegetated median, lighting, sculpture, and other forms of public art, would also be the responsibility of the municipality. These elements would be constructed pursuant to a maintenance agreement between the State and municipality.

Establishing a dedicated fund for ongoing maintenance of the noted elements is beyond the scope of this Project.

C 9-127: NYSDOT should establish a Community Benefit Enhancements/Mitigation fund to assist impacted downtown businesses, institutions, and residents, from which our community can draw from to support a campaign throughout the construction period. This project is a significant undertaking, the likes of which central New York has not seen before. Demolition,

construction, noise, dust, and staging need to be managed in a neighborhood context-sensitive manner.

- R 9-127: Establishing a community benefit enhancements/mitigation fund is beyond the scope of this Project. The Project is being federally funded by FHWA; therefore, expenditures are restricted to transportation purposes. Mitigation measures are confined to the Project Area. Measures proposed for mitigation (such as for demolition, construction, noise, dust, and staging) are described under each relevant resource category in **Chapter 6**.
- C 9-128: NYSDOT must work closely with the City, Downtown Committee and others to ensure a regular flow of information so we can coordinate to keep businesses, property owners and residents well informed about what is happening “next.” To this end, NYSDOT should develop communication tools to advise our businesses and residents on what to expect while construction is underway. NYSDOT must also renew its commitment to community engagement and outreach in advance of the construction bidding process to ensure contractors are aware of constituent concerns and construction requirements and must hold contractors accountable to the specified approach.
- R 9-128: NYSDOT will coordinate with affected businesses and residents prior to starting construction. Refer to **Table 4-7** in this FDR/FEIS for a list of construction mitigation commitments, including plans for outreach to businesses and the public.
- C 9-129: NYSDOT must identify offsite parking solutions for construction workers during the construction period and consider the location and appearance of construction field offices to maximize parking availability for downtown customers and the appearance of the community while construction is underway. Potential may exist to lease underutilized office spaces for construction field offices instead of bringing in moveable trailers.
- R 9-129: **Table 4-7** of this FDR/FEIS identifies the measures to mitigate adverse construction effects. A Traffic Management Plan would include measures to address parking during construction, which may include off-site parking for contractors, park-and-ride lots for employees in Downtown and University Hill, wayfinding and detours to direct people to parking facilities, and media services to communicate changes in on- and off-street parking near the construction zones.
- C 9-130: There are a series of surface parking lots located underneath the current I-81 viaduct used by State employees, visitors to the Erie Canal Museum, and institutional and commercial office tenants and organizations with monthly permit agreements. While the construction activity is underway these cars will be displaced for an extended period. The DEIS has removed the parking garage originally proposed in the PDEIS. NYSDOT should include the construction of a new parking garage in Downtown Syracuse to accommodate not only State employees, but also the local populations (commercial, retail, visitor) as well. Flexibility in offering much-needed parking options is paramount. This type of community benefit enhancement provides

parking for State employees and offers added support to house those displaced during construction.

- R 9-130: As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative would result in a loss of 1,089 public off-street parking spaces, which include spaces used by employees at the New York State Office Building. A variety of potential options were evaluated to mitigate the loss of public off-street parking spaces, including the replacement of existing parking facilities and the development of new surface parking lots. Locations were considered that would not require additional property takings, would not be desirable for commercial development, and would not impact City zoning, or any potential new greenspace or gateway-type areas. A preferred mitigation option was identified that accounts for the reduction in the number of spaces that need to be compensated due to the anticipated increase in the number of telecommuters over the long-term (817 spaces to be replaced versus 1,089 spaces). The preferred mitigation option also considers the proximity of the proposed parking facilities to the location of public off-street parking spaces that would be lost. The preferred mitigation option proposes four new surface parking facilities, which would be situated near the existing parking facilities that would be removed under the Community Grid Alternative. Combined, the four proposed parking facilities would provide 896 public off-street parking spaces, which exceeds the minimum 817 that are needed. After further evaluation, it was determined that a new parking garage would not be required to mitigate the public off-street parking impacts.
- C 9-131: Project should employ local people during construction. The Project should implement the federal SEP-14 Local Hire program and should have a CWA-PLA agreement in place that includes unions and community representatives in decision-making for the Project.
- R 9-131: NYSDOT has submitted a local hiring preference application that if approved will create a local hiring preference for the I-81 Viaduct Project. The Department has appreciated the collaboration it has had with Urban Jobs Taskforce and others to create an application that will create an opportunity for the community to seek employment through the I-81 Viaduct project and will include an expansion of NYSDOT's On-the-Job Training program for the project to increase access for individuals to seek careers in heavy highway construction. This will help give greater opportunity for individuals living near the project and in the City of Syracuse to work directly on the project. In addition to the federal local hiring preference application, NYSDOT has partnered with NYSDOL to create Workforce Forward: Syracuse. This program and \$1 Million in State funding will seek to connect workers to training opportunities and to good-paying short-term and long-term infrastructure jobs in and around Syracuse. For those seeking to work on the many ancillary jobs that will be created by this project, Workforce Forward will help place, and train those individuals. The plan is to have NYSDOL in the local community connecting with people in the neighborhoods they live and help them find the employment or training they will need to be successful. NYSDOT also has the WorkSmart NY program in partnership with SUNY EOC which is helping give those who want to work in infrastructure construction the basic skills to work on any job site. NYSDOT

has applied for federal grant funds through FHWA to expand the program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program will grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship which is a program to help get more people involved in local trades unions. NYSDOT has recently secured federal STICC funds to create a new, interactive video program to introduce and encourage High School students to pursue careers in heavy highway construction. The plan is to work directly with the Syracuse City School District and its P-Tech program to show students the vast opportunities they have in the field of building infrastructure through first-person videos by students and individuals working on projects. The idea is to use the I-81 Viaduct Project as a catalyst to create video content that students can explore to learn more about fields of interest. NYSDOT wants to create a unique, meaningful program that would lead to opportunities for long-term employment on the Project. NYSDOT plans to monitor the local hiring metrics throughout the project and will conduct regular meetings with the WorkSmartNY Syracuse Build Collaborative to gauge the progress on hiring and where things need to be adjusted.

9-4 EMMI COMMERCE PARK DEVELOPMENT COMPANY AND RELATED BUSINESSES

- C 9-132: The location of our hotels – including Homewood Suites by Hilton, Liverpool; Hampton Inn & Suites, North Syracuse; Tru by Hilton, Liverpool; and Super 8 Motel, Liverpool – and other real estate holdings offer convenience to all travelers and were purposely placed here due to proximity to interstate traffic-I-81, our “Main Street.” The Community Grid Only concept as currently proposed by NYSDOT will severely diminish our ability to attract out-of-town visitors that value the convenience and easy and direct access to I-81 and the entire Syracuse and Onondaga County region. Therefore, we are adamantly opposed to the Community Grid Only proposal.
- R 9-132: The Community Grid Alternative would not substantively diminish the ability of 7th North Street hotels to attract visitors that value convenience and easy and direct access to I-81 or the entire Syracuse and Onondaga County region. For those travelers intending to stay in the Syracuse area, the 7th North Street hotels will continue to be immediately proximate to I-90. For travelers arriving from points north or south of the I-481 interchange, and/or for those intending to travel further on I-81 after their stay, the difference in travel times between the I-81 and BL 81 under the Community Grid Alternative would be 5 minutes or less, which is not a large enough difference to alter travel decisions for a vast majority of out-of-town guests. Travelers can be expected to continue to stay at these hotels because the de minimis change in travel time between I-81 and BL 81 would have no effect on the overarching reason that the traveler chooses to visit the Syracuse area or to stay at a particular hotel, which can be attributed to proximity to an attraction (e.g., Destiny USA or the planned aquarium at the Inner Harbor) or airport, cost, amenities, brand loyalty, and other factors.
- C 9-133: The DEIS references a projected 1.3 percent loss of business to our hotels, which is completely flawed and wildly inaccurate. As the long-term owners and operators of these hotels, we understand the significant portion of business that we derive from I-81 currently will

be lost because of a Community Grid detour to the current I-481 pathway. Among our objections to the conclusion in your report:

- No data or input from the owners or management of our hotels or from our neighboring hotels was ever requested by NYSDOT, despite repeated offers and written documentation to NYSDOT officials that we were willing to share such proprietary and confidential information.
- The final analysis and calculation by NYSDOT is so far removed from the actual results that we compile on a regular basis, that it calls into question the validity and accuracy of the entire DEIS.
- Much of the data used in the DEIS is out of date, some of it over five years old.
- The data used were for the entire County and not the specific subject area of the hotels clustered at Exit 25. Hotels in each area of the County have different demand generators and mix of business. The hotels at Exit 25 depend heavily on Interstate traffic, while the hotels in the Downtown cluster do not. Using County-wide data and not location specific data will skew the results of any analysis, again, calling into question the validity of the conclusion.
- The data also do not account for change in the hotel and real estate leasing business models due to Covid-19; the negative impacts of which are projected to be long-lasting and possibly permanent.
- Most significantly, the data only examine “guests with no reservations” and do not consider the impact a Community Grid Only concept will cause to guests who do make a reservation, either weeks or days in advance, or on the same day based on the hotel's location and convenience of I-81 access. In several national surveys of guests, “location of hotel” is ranked as the number 1 or 2 reason for selecting a particular hotel.

R 9-133: The analysis in **Section 6-3-2** of the DDR/DEIS was provided in response to public comments, including comments from hotel owners. Based on the concerns cited by commenters, NYSDOT developed a methodology for the analysis of potential effects on hotels that relied on publicly available data, supplemented by years 2013-2019 hotel trend data for the Liverpool, NY area purchased from STR, Inc., and StreetLight data specific to the hotels at Interchanges 23 through 25. StreetLight Data is an on-demand mobility analytics platform that takes and analyzes vehicle movements using data from mobile devices, connected cars and trucks, as well as census data, road network information and more. StreetLight Data is used by consultants and businesses to perform demand modeling and understand travel behavior, among other uses. For the EIS analysis, the data was used to determine the number of trips during different periods of time and by routes to destination. The data includes all vehicles to/from a destination, including the destination's employees and visitors.

Through the public review process for the DDR/DEIS, NYSDOT and FHWA welcomed review and comments from interested parties, who can provide additional information beyond that found in the DDR/DEIS analysis; NYSDOT considered all comments in developing the FDR/FEIS and issuing findings. It should also be noted that the STR hotel and StreetLight data were supplemented in this FDR/FEIS with data from local hotels, including several located at or near I-81 Interchanges 23 and 25. Data received from hotels was precipitated by

a meeting with 12 hotel representatives held at their request on September 13, 2021. Following the September 13th meeting, NYSDOT requested information from the hotel representatives including employment estimates, hotel amenities, guest composition and origins, advance bookings vs. walk-in reservations, length of stay, and brand loyalty membership. The responses included confidential performance data and therefore is not included in the appendix to this FEIS.

As detailed in **Section 6-3-2**, the analysis utilized hotel trend data for the Liverpool, NY area purchased from STR, Inc., StreetLight data specific to auto trips to the hotel cluster in the vicinity of the I-81/I-90 interchange, and the findings of hotel visitor stays in the Syracuse market from the Visit Syracuse report. These data were supplemented in this FDR/FEIS with data from local hotels, including several located at or near I-81 Interchanges 23 and 25. Data received from hotels was precipitated by a meeting with 12 hotel representatives held at their request on September 13, 2021. Following the September 13th meeting, NYSDOT requested information from the hotel representatives including employment estimates, hotel amenities, guest composition and origins, advance bookings vs. walk-in reservations, length of stay, and brand loyalty membership. None of the responses provided specific information on the origins of visitor base, which is critical to understanding the potential loss of consumer base due to re-routing of I-81 traffic with the Community Grid Alternative. Similarly, with respect to walk-in bookings, hotel responses did not distinguish between walk-in and same-day reservations, though it is noted that hotels believe the rate to be higher than the 5.3 percent estimate utilized for the DDR/DEIS.

Data specific to the hotels analysis included 2019 STR data, StreetLight data collected in 2019, and the Visit Syracuse study conducted in 2015. While the Visit Syracuse data is over five years old, there is no known third-party source of comparable market data, and the data utilized from this analysis—estimates of through-travelers who stayed at Syracuse hotel without a Syracuse destination in mind—is not expected to have substantively changed due to the passage of time. With respect to the 2019 STR and StreetLight data, these data provide the most up-to-date “pre-Covid” market conditions, which are expected to more accurately reflect long-term market conditions relative to 2020/2021 market conditions.

The analyses in **Section 6-3-2** utilizes data sources and methodologies appropriate for environmental analyses under NEPA and SEQRA; the county-wide data provides a good estimate of trip purpose, and the analysis is conservative in its projections. The data used for the hotels analysis included STR and StreetLight data specific to the hotels clustered at the I-81/I-90 interchange.

The economic analyses in **Section 6-3-2** do not speculate as to the long-term market effects of the Covid pandemic during operating conditions for project alternatives (i.e., 2026 forward). While Covid-19 will likely result in long-term and potentially permanent changes in hotel operations (e.g., changes in cleaning practices, HVAC systems, food service), most industry experts predict a return to pre-Covid occupancy levels prior to 2026, which is the first year of operational conditions for project alternatives. Forbes surveyed over 500 industry professionals, including investors, travel tech suppliers, members of the travel industry,

thought leaders and professional hosts and property management companies; over half of respondents predicted 2022 to be the year of complete travel recovery.

Section 6-3-2 considers the potential effects on all guest stays, including those with reservations. The analysis focuses on potential loss of through-travelers because for those with a Syracuse destination, the hotels would continue to be well-positioned in the market, and the change in travel time from the expected route of travel would be negligible. The Community Grid Alternative would not substantively diminish the ability of 7th North Street hotels to attract visitors that value convenience and easy and direct access to I-81 or the entire Syracuse and Onondaga County region. For those travelers intending to stay in the Syracuse area, the 7th North Street hotels will continue to be immediately proximate to I-90. For travelers arriving from points north or south of the I-481 interchange, and/or for those intending to travel further on I-81 after their stay, the difference in travel times between the I-81 and BL81 under the Community Grid Alternative would be 5 minutes or less, which is not a large enough difference to alter travel decisions for a vast majority of out-of-town guests. Travelers can be expected to continue to stay at these hotels because the de minimis change in travel time between I-81 and BL 81 would have no effect on the overarching reason that the traveler chooses to visit the Syracuse area or to stay at a particular hotel, which can be attributed to proximity to an attraction (e.g., Destiny USA or the planned aquarium at the Inner Harbor) or airport, cost, amenities, brand loyalty, and other factors.

- C 9-134: In our analysis, the loss of the convenience the highway interchange exits provide will result in greater than 25 percent loss of revenue, resulting in substantial loss of jobs and will jeopardize the viability of the hotels continued operation. Our lenders have placed debt/income ratio performance levels on our notes. If we fall below acceptable levels, our mortgage notes will be called.
- R 9-134: Construction of the Community Grid Alternative would last approximately six years and could result in adverse effects to businesses due to temporary lane and/or road closures that could impede access by customers and/or workers, including drivers, pedestrians, and bicyclists. **Table 4-7** of Chapter 4, Construction Means and Methods identifies measures to mitigate adverse effects to businesses during construction, including temporary business signs to identify business entrances and to direct customers to businesses that would be affected by detours. Short-term benefits to the Project Area would occur during the construction phase of the Project in the form of increased demand for local materials, services, and labor. The short-term increases in employment would be expected to filter through the regional and local economies, generating consumer and business spending. Some of the additional spending within the regional and local economies would be expected from contractors, sub-contractors, and employees, and would be in the form of additional retail and entertainment sales, food and beverage, and hotel stays.

The analysis in **Section 6-3-2** of the DDR/DEIS and FDR/FEIS does not support the potential loss in revenue cited by the commenter. The Community Grid alternative would not result in reductions in traffic volumes, travel times, or through-traffic consumer base that could lead to

a 25 percent loss in revenue. The economic analyses in Section 6-3-2 do not speculate as to the long-term market effects of the Covid pandemic during operating conditions for project alternatives (i.e., 2026 forward). As detailed in **Section 6-3-2** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative is not expected to result in significant loss of guest stays at hotels located along the existing I-81 corridor. The location of a hotel along the expected route of travel is one factor among several that affects a traveler's choice of hotels. Travelers can be expected to continue to stay at these hotels because the de minimis change in travel time between I-81 and BL 81 would have no effect on the overarching reason that the traveler chooses to visit the Syracuse area or to stay at a particular hotel, which can be attributed to proximity to an attraction or airport, cost, amenities, brand loyalty, and other factors.

- C 9-135: As a result of reduced traffic to the immediate area, other ancillary services to out of town travelers, such as gas stations, convenience stores, shopping, restaurants -- some of which we have a financial interest in -- may close or relocate. Reduced revenues and increased costs to the hotels and other ancillary services will reduce the taxable assessment of those properties, which in turn will reduce local government and school tax collections.
- R 9-135: The projected reductions in hotel visitors would not substantively affect revenues and assessed values at ancillary services, which depend only in part on hotel visitors. It should be noted that **Section 6-3-2** of the DDR/DEIS found that lost revenues from the Pilot Travel Center could jeopardize the viability of this truck stop. The truck stop currently generates \$5,204, \$2,729, and \$26,965 in property taxes for Onondaga County, Town of Salina, and Liverpool Central School District, respectively. These taxes represent a very small percentage (less than one-tenth of one percent) of the overall tax levy for each taxing jurisdiction.
- C 9-136: Over 50 percent of our employees use I-81 to travel to/from work. Additional commute time will create a negative impact on our employee retention and recruitment efforts, especially from neighborhoods on the south side of Syracuse, where many of our current employees live.
- R 9-136: Under the Community Grid Alternative, approximately 1.3 miles of existing highway would be removed, which has a minimal effect on travel time. The projected changes in commute time are not expected to be large enough to impact employee retention and recruitment efforts. As shown in **Table 8-2 of Chapter 8** of the DDR/DEIS and FDR/FEIS, commute times from the south side of Syracuse to Interchange 25 would increase by a maximum of 4 minutes during peak hours; during off-peak hours, commute times would be expected to be the same as under the No Build Alternative. In addition, there are multiple routes that employees can use from downtown, and there is limited access from the Southside to the existing highway. Furthermore, the Community Grid Alternative would improve traffic flow and safety, reducing the anticipated number of accidents that create major travel delays.

9-5 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION (NYSDEC)

- C 9-137: Section 5.5.3, Table 5-44, Note 3 – Indicates that minimum runoff reduction volume is calculated in accordance with the NYSDEC Stormwater Management Design Manual. It is understood WQv was calculated per NYSDOT Chapter 8, Appendix B; however, NYSDOT must indicate that WQv is also calculated with standards that are consistent with the NYSDEC Stormwater Management Design Manual.
- R 9-137: The text has been modified accordingly.
- C 9-138: Section 5.5.3, page 5-129 references outdated stormwater permit GP-0-15-001. This should be updated to reference Permit GP-0-20-001.
- R 9-138: The text has been modified accordingly.
- C 9-139: On DEIS page 5-70 and page 6-339: The City of Syracuse is not a respondent of the Order on Consent mentioned on these pages.
- R 9-139: The text has been modified accordingly.
- C 9-140: DEIS page 5-71: Please confirm that Harbor Brook is receiving stormwater from I-481. Harbor Brook is located south and west of the I-81 Central Study Area.
- R 9-140: The text has been modified accordingly.
- C 9-141: DEIS page 5-131: Please estimate the additional volumes of runoff to the combined sewer if the Viaduct Alternative is implemented.
- R 9-141: Per **Table 5.4.3**, there would be a small overall reduction in runoff from the Project Area. Additionally, the area contributing to the existing combined sewer would be reduced further as a result of the new storm trunk sewer, which will separate stormwater from the combined sewer within the downtown area (refer to the discussion on page 5-130).
- C 9-142: DEIS page 5-134: If hydrodynamic treatment systems are installed, which municipality or State government will be responsible for operation and maintenance (O & M)?
- R 9-142: NYSDOT will own and maintain the new trunk storm sewer and the drainage systems along BL 81, therefore, NYSDOT would own and maintain the hydrodynamic units connecting the BL 81 roadside drainage to the new trunk sewer. If future connections to the storm trunk sewer are made by the City or county, then those municipalities would own and maintain the hydrodynamic units providing connectivity between the two systems.
- C 9-143: There were several locations where the regulated adjacent area (AA) was shown crossing roads. Regulated adjacent areas end at the edge of existing pavement on paved roadways and do not cross over into the medians.

- R 9-143: In the FDR/FEIS, the adjacent areas on the figures have been updated to reflect that they end at the edge of pavement and do not cross over into the medians. The adjacent area calculations have also been updated.
- C 9-144: Wetlands identified using the 2020 Preliminary Wetland Mapping and Assessment Methodology (Appendix I-2) and which were verified, will need a better description of the verification process. Will these wetlands be delineated in the 2021 field season?
- R 9-144: As of 2021, all wetlands in the Project Area have been delineated. The FDR/FEIS reflects a combination of wetland delineations and 2020 wetlands mapping. A Wetland Delineation Report, which will include all delineated wetlands in the Project Area, is currently being prepared and will be submitted to NYSDEC with a request for a jurisdictional determination after publication of the FDR/FEIS.
- C 9-145: Wetland nomenclature which gives the same identifier to wetland areas with hydrologic connections makes reviewing difficult. Since not all hydrologic connections confer regulated status to connected wetlands, it would help the review process if the wetlands were individually labeled. This is a particular problem with Wetland 10 where there are many wetlands all labeled Wetland 10. It makes it hard to pinpoint a particular location. NYSDEC wetland identifiers should be clearly labeled on maps in addition to the labeling system used by NYSDOT.
- R 9-145: As discussed in a September 29, 2021 meeting between NYSDOT and NYSDEC, the DDR/DEIS includes mapping that assigns an alpha-numeric numbering system to individual wetland areas that are part of a larger wetland. DEC-mapped wetland labels and classifications are also included on the maps where applicable. In addition, as per the discussions during the meeting, tables have been added to the figures and text of the FDR/FEIS to differentiate between wetlands that are regulated under New York State Environmental Conservation Law Article 15 and Article 24.
- C 9-146: Article 15 wetlands: There were a few locations along navigable streams with riparian wetlands which are at least partially inundated during MHWL events. These wetlands would be regulated by Article 15. Article 15 wetlands do not have regulated adjacent areas. Ley Creek, Butternut Creek and Onondaga Creek are identified in the DEIS as meeting the criteria for NYSDEC navigability.
- R 9-146: New York State Environmental Conservation Law Article 15 wetlands were identified in the DDR/DEIS. Adjacent areas have been updated in the FDR/FEIS and all adjacent areas have been removed from Article 15 wetlands.
- C 9-147: DEIS Chapter 6-4-71.2 Surface Waters: In the narrative and tables, Butternut Creek is shown as class C. It has a C(T) section, south of East Genesee Street which would require different work timing than the class C section. This will have a bearing on Table 6-4-7-2 and possibly affect the standards for some parameters because of a different "best use." This correction of

the standard will be pertinent to allowable work timing and the jurisdictional area (top of bank vs MHWL). The timing for “C” and “B” is different from timing for C(T) reaches.

- R 9-147: **Table 6-4-7-2** includes the standards for trout waters when they differ from non-trout waters. Two rows were added to the FDR/FEIS table that state the timing and jurisdiction.
- C 9-148: Other streams such as parts of Onondaga Creek, Butternut Creek, and Ley Creek would be clearly considered navigable and therefore could have Article 15 wetlands as described above. Meadow Brook Creek and Mud Creek are also described as navigable.
- R 9-148: Comment noted. The FDR/FEIS reflects that parts of Onondaga Creek, Butternut Creek, Ley Creek, Meadow Brook, and Mud Creek are navigable under Article 15.
- C 9-149: For planning purposes, Class C(t) streams: work can occur between May 15 and October 1; for Navigable Class C streams: work may occur between July 15 and March 15.
- R 9-149: Comment noted. These work periods have been added to the FDR/FEIS.
- C 9-150: Tree cutting shall be done 11/1 to 3/31 to avoid impacts to bat species. It seems that all appropriate potential permits have been identified.
- R 9-150: Comment noted. This timeframe is included in the DDR/DEIS and the FDR/FEIS.

9-6 SYRACUSE METROPOLITAN TRANSPORTATION COUNCIL

- C 9-151: DEIS Chapter 5, page 5-138, table 5-45. Please remove the three notes about current proposal by SMTTC to change classification. The functional classification adjustments were submitted by SMTTC to NYSDOT and FHWA in 2017. FHWA approved the changes in 2018, and the information in Appendix C-6.5 should be updated to reflect these. The most current functional class and NHS designations can be found on the maps on the SMTTC's website <https://smtcmpo.org/data/pdf-maps/>.
- R 9-151: The text has been modified.
- C 9-152: In DEIS Chapter 5, regarding terminology related to ITS and the National ITS Architecture. “Market packages” changed to “service packages” several years ago.
- R 9-152: The text has been modified.
- C 9-153: In DEIS Chapter 5, page 5-4. Noted projects should be reviewed with the responsible entity. There are some that may no longer be applicable/desired and would therefore be removed from inclusion in the final EIS.
- R 9-153: The text has been modified.

- C 9-154: In DEIS Chapter 5, 5.3.1, page 5-5. This subsection on functional classification references project funding under the STP. Although the STP is one of the primary funding programs, currently, it is not the only federal transportation funding program where functional classification is used to determine federal aid eligibility. The National Highway Performance Program is another example where a roadway's classification is considered. SMTC suggests rephrasing the applicable sentence.
- R 9-154: The text has been modified.
- C 9-155: The DEIS should differentiate between the "SMTC model" (i.e., the TransCAD model that was originally shared with NYSDOT in 2013) and the "NYSDOT model" (i.e., the current iteration of the TransCAD model, which we assume has been heavily altered by NYSDOT's consultants from the 2013 model and which does not include any of the updates made by SMTC staff to our internal model in 2017).
- R 9-155: **Chapter 5** of the FDR/FEIS has been updated to differentiate the models.
- C 9-156: Has NYSDOT considered the possibility of relocating the STEAM at Dr. King School to a new building farther away from BL 81? What is the attendance pattern for that school (where are students walking from) and how will that be impacted by the proposed roundabout?
- R 9-156: NYSDOT did not identify a need to relocate the Dr. King Elementary School. Additionally, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East in the vicinity of Dr. King Elementary School as part of the Community Grid Alternative.
- C 9-157: The DEIS identifies "I-81 Project Proposed Bicycle Facilities," which includes a shared use path between I-81, Lodi, Hiawatha, and Bear Street. The DEIS does not indicate if the path would cross the Hiawatha bridge (over I-81) to link the Northside to the Lakefront.
- Consider extending the "I-81 Project Proposed Bicycle Facilities" over Hiawatha bridge to the Onondaga Creekwalk to link the Northside and the Lakefront, as identified in SMTC's 2020 Regional Transportation Center-Regional Market Area Mobility Study.
 - Consider potential on- and off-road bicycle and pedestrian improvement options (under I-81 at Park Street and at Harborside Drive) identified in the same study.
- R 9-157: As indicated in the DDR/DEIS and FDR/FEIS, the shared use path would end at the intersection of Hiawatha Boulevard and Lodi Street, where it would connect to the existing sidewalk on the south side of Hiawatha Boulevard. The Project does not require modifications to the existing Hiawatha Boulevard bridge over I-81; therefore, extension of bicycle facilities was not considered at this time, although it would not be precluded as a future action. Similarly, improvements at the Park Street and Harborside Drive, though beyond the scope of this Project, would not be precluded as a future action by others.
- C 9-158: Existing and ongoing studies support extending the Bear Trap Creek Trail south to the Ley Creek Trail (and the future Loop-the-Lake Trail), and north under I-81 towards the Syracuse

Hancock International Airport (Airport). NYSDOT should consider including trail extensions as identified in these studies, along with a physical barrier along I-81 to protect trail users from I-81-related crashes:

- SMTC's 2020 Regional Transportation Center-Regional Market Area Mobility Study discusses two potential options (one on-road, one off-road) to extend south to the Ley Creek Trail.
- SMTC's 2013 NYSDOT Bicycle Commuter Corridor Study identifies potential options to extend south to the Ley Creek Trail and north towards the Airport.
- SMTC's US 11 Mattydale Mobility Study (in progress). SMTC anticipates completing the study during the summer of 2022. Currently, SMTC is reviewing potential on-road and off-road options to extend the trail to the north towards the Airport. The Town of Salina has also expressed safety-related concerns that stem from the lack of a physical barrier to protect existing trail users from I-81-related run-off-the-road crashes.

R 9-158: Extension of the trail system in this area is beyond the scope of the Project but would not be precluded as a future action by others. However, the Project would add a noise barrier and guiderail between I-81 and the Bear Trap Creek Trail (see **Section 6.4.7** for further details) between 7 North Street (Exit 25) and Route 11 (Exit 26).

C 9-159: The shared path from the roundabout to Leon Street should be extended to at least Oakwood Avenue. The path is on the property of MLK School, which would be easier to work with than private property, and would add protection to users accessing the neighborhood. Reducing the use of sharrows is vital as recent studies have shown that they may actually increase crashes involving cyclists.

R 9-159: With the severing of MLK, Jr. East from BL 81 proposed under the Community Grid Alternative, a transition from a shared use path to a shared lane facility can best be accommodated at Leon Street/MLK, Jr. East. There is no designated bicycle facility at Oakwood Avenue that would support an extension of the shared use path under this project.

C 9-160: Protected bike lanes should be used as often as possible. The National Transportation Safety Board recommend the use of separated lanes whenever possible to reduce serious injuries and deaths among cyclists. Although any increase in bike infrastructure is welcome, a project of this scale should emphasize the best practices currently available—especially as biking is seen as one of the best ways to reduce our emissions quickly.

R 9-160: Both off-road protected facilities and on-road bicycle lanes were incorporated into the Project where the right-of-way was available. In cases where right-of-way was unavailable and the streets were low volume, shared lanes were proposed. See **Appendix A-1** of the DDR/DEIS and FDR/FEIS for additional details.

C 9-161: SMTC's South Geddes Street and West Fayette Street Complete Streets Review includes a recommendation to extend existing bike lanes from Erie Boulevard West heading south. It also recommends extending the trail through Lipe Art Park to the westside of the City of

Syracuse via a trail along the NYS&W railway. This trail should also extend east to connect with the Connective Corridor in Armory Square. DEIS Figure 3-18 shows the NYS&W railway (City proposed trail). NYSDOT should consider an extension of the Lipe Art Park trail to reach the Connective Corridor under the West Street bridge. This area under the bridge is tight and keeps bicyclists/pedestrians from traveling between Armory Square and Tipperary Hill/West Side locations.

R 9-161: These improvements are beyond the scope of the Project but would not be precluded as a future action by others.

C 9-162: In DEIS Chapter 3, "Bicycle, Pedestrian, and Other Improvements to local Streets," starting on page 3-23, NYSDOT should consider a connection to Jamesville through Oakwood Cemetery to provide additional commuter options as well as bicycle touring opportunities:

- Consider Creekwalk extension: improve Ballard Avenue, Cortland Avenue, Kennedy Street, Oakwood Avenue for bike/ped travel, and then connect to Oakwood Cemetery via tunnel under I-81 to Oakwood Cemetery Historic Entry Gate.
- And/or connect the Creekwalk via Dr. Martin Luther King Boulevard (formerly Castle Street) following Renwick Avenue, Fineview Place, follow County/railroad ROW to reach the Oakwood Cemetery Historic Entry Gate.
- Use either of these options to set the stage for future bike/ped trail connections to Jamesville via Colvin Street, Moore Ave, Smith Lane, Jamesville Avenue, to NYS&W railway. Potential for rail with trail here along OCIDA-owned property that the railway runs along.

R 9-162: These improvements are beyond the scope of the Project but would not be precluded as a future action by others.

C 9-163: NYSDOT should revise DEIS Figure 5-16 with the following changes:

- The routing shown for NYS Bike Route 11 is incorrect. The existing bike route 11 signs have the cyclist turning onto East Taylor Street, then onto South Salina Street to head south. Several years back, this routing was changed (by main office NYSDOT) from Burt Street to Taylor Street, as no left turn is allowed from Burt Street onto S Salina Street. Figure 5-16 in the DEIS shows the route as turning onto Raynor, which is incorrect. Please note: this same location is also incorrectly shown on NYSDOT's website (Bike Route Viewer). SMTC has tried a few times nearly every year between 2011 and 2019 to get this route corrected on the state website with no luck.
- The Empire State Trail through Syracuse is complete, so the legend should not say "existing unsigned route" nor should it include a "proposed route." Remove these.
- The legend should simply say existing and proposed bike facility (SMTC does not own any infrastructure—including bike facilities—and so it should not be referenced in the legend).
- There are several discrepancies between DEIS Figure 5-16 and Figures 6-4-2-2/6-4-2-3. Based on the dates on the figures (top left corner) it appears that the figures in Chapter 6 were never updated with newer information.

R 9-163: The figure has been revised accordingly.

C 9-164: SMTC suggests that Community Grid bike lanes connect to existing infrastructure, not just proposed City routes, or consider implementing some proposed City routes to provide a completed bicycle connection as part of the Community Grid.

- Proposed Community Grid connections should connect to existing bike lanes on Fayette Street and the Empire State Trail either via North Salina Street, by implementing the proposed City bicycle facility along South Salina Street (ideally connections should also be included south along Salina St.) or State Street.
- Connect the new West Street bike lane to the Creekwalk via Erie Blvd West by implementing the proposed City bicycle facility along Erie Blvd West.

R 9-164: NYSDOT will consider refinements to trail configurations and locations in final design to better tie into existing and proposed facilities within the project limits. Extensions of trails beyond the project limits would not be considered.

C 9-165: What techniques are being used to slow traffic transitioning from BL 81 to Almond Street approaching downtown from the south? As proposed, 12-foot lanes on BL 81 will encourage speeds higher than 30 mph, which is evidenced by existing issues in the Village of Liverpool, where signs indicate that the speed limit drops from 55 mph to 30 mph within just a few hundred feet, but the physical design of the roadway does not change. Signs alone will not slow traffic adequately entering a village or City core.

What is the major benefit to portions of the grid being designated a Qualifying Highway (with 12-foot lanes) versus an Access Highway (with 10-foot lanes)? The landscaped buffer on each side of Almond Street as proposed is a generous 10-22 feet in width. A standard 10-foot width would be more than enough for landscaping and protection while providing additional land back to the community.

R 9-165: As described in **Section 3.4.3**, traffic calming measures are proposed on BL 81 between Colvin Street and just south of MLK, Jr. East to encourage motorists to reduce speeds from 55 mph to 30 mph. These measures include gradually reduced posted speed limits and physical alterations to BL 81, such as fewer lanes, narrowed shoulders, roadway curves, and curbing. Both northbound and southbound BL 81 would transition from three lanes to two lanes north of Colvin Street. By not including a median-side lane in each direction, there would be ample space to introduce urban landscaping treatments and other visual cues to further convey to motorists that they are transitioning from a freeway to a City street and vice versa. Regarding lane widths on Almond Street, see response to **Comment 4-43**. NYSDOT will work with the City and appropriate stakeholders during the final design phases to refine the design of the areas of Almond Street outside the curblines, including widths of the medians and pedestrian refuge areas, cycle track, shared use lanes, and sidewalks, etc. The refinements to Almond Street would be designed to be consistent with the City's vision and the needs and objectives of the Project.

- C 9-166: DEIS page 3-33 states that Van Buren Street would serve as the main entrance from the south to University Hill. What is the projected volume at that location? Does Van Buren Street have the capacity to act as the “main entrance”? How will this impact the VA Medical Center parking garage that is built over Van Buren Street?
- R 9-166: **Appendix C** of the DDR/DEIS and FDR/FEIS shows the traffic volumes at all study area intersections. As shown in Chapter 5, Van Buren Street would operate acceptably under the Community Grid Alternative. The redistribution of traffic between the Van Buren Street and Irving Avenue access points to the garage is not expected to impact garage operations.
- C 9-167: DEIS page 5-139 lists new and replacement signal locations under the Community Grid alternative. Were roundabouts considered for any of these locations, especially the new signal locations?
- R 9-167: Roundabouts were considered at several locations, but were dismissed based on right-of-way, pedestrian accommodations, and other factors.
- C 9-168: DEIS page 5-148 states that “demand reductions to account for changes in telecommuting behavior were not applied to the analysis of the completed Community Grid Alternative under ETC and ETC+30 conditions.” Why were these reductions not applied? Ignoring this trend will lead to overdesigning the future infrastructure.
- R 9-168: For the construction traffic analyses, a 10 percent reduction due to current telecommuting trends was applied, as this represents a near-term, temporary condition where capacity would be reduced and therefore small reductions in traffic would have a greater effect. For the final build conditions, this reduction was not applied and while a 10 percent demand reduction might have some effect on design at some locations, NYSDOT believes the overall Community Grid Alternative design would not be affected. Since the design year projections are more than 30 years in the future and less certain than near-term conditions, NYSDOT did not apply these telecommuting reductions to the long-term conditions.
- C 9-169: Adding a fourth northbound lane on BL 81 North improves LOS from a D to a B, but one of the main issues in this section currently is the frequency of exits. The Community Grid plan simplifies the exits and entrances, which should improve traffic flow without the additional lane.
- R 9-169: The traffic analyses performed for the project indicate that the fourth northbound lane is required under the Community Grid Alternative.
- C 9-170: The additional lanes added to Lyndon Corners are likely to only increase traffic, not improve flow. How will pedestrian and multi-modal accessibility be improved in this area? SMTC's 2017 Central DeWitt Mobility Plan made some recommendations for this area.

- R 9-170: NYSDOT performed a detailed analysis of the proposed improvements, and the studies indicate that traffic flow would be improved (see **Chapter 5** of the DDR/DEIS and FDR/FEIS for additional details). The Project focuses improvements on the I-481 Interchange 3 location. The Project will not preclude NYSDOT, or others, from introducing additional multi-modal improvements.
- C 9-171: Constructing high-quality shelters, whether Bus Rapid Transit (BRT)-related or not, along with loading platforms should be included in all street designs. Currently many Centro bus stops lack a concrete landing pad or even a sidewalk; this should be corrected within the study area.
- DEIS Chapter 5, Transit, page 5-64: One of the project's objectives is to "maintain access to existing local bus service and enhance transit amenities within the project limits in and near Downtown Syracuse." The DEIS states "It is expected that both STSA and SMART 1 would help Centro establish the basis to pursue Federal Transit Administration (FTA) New Starts, Small Starts, or Very Small Starts funding..."
- The SMART 1 project was finalized February 2018 and recommends BRT-Mixed Traffic along two corridors primarily in the City of Syracuse as the project's Locally Preferred Alternative (LPA) and is denoted as such in the area's Long Range Transportation Plan. As an outcome of the SMART 1 study, BRT-Mixed Traffic is the SMTC's definition of enhanced transit. The LPA includes numerous capital and operating activities, such as but not limited to hours of operation, headways, and stations. Although this would be a new, more efficient type of transit service, the BRT-Mixed Traffic service would greatly reduce and/or replace "local bus service" routes currently along the two corridors. The SMART 1 LPA overlaps the I-81 project area in numerous locations and should be included in any I-81 design and construction plans. Also, the total capital costs identified through the planning effort fall in line with the "Small Starts" category (e.g., total project cost is less than \$300 million and total Small Starts funding sought is less than \$100 million), not "New Starts." Lastly, "Very Small Starts" no longer exists as a distinct project category; reference should be removed.
- R 9-171: A stated objective of the Project is to "maintain access to existing local bus service and enhance transit amenities within the Project limits in and near Downtown Syracuse." "Transit amenities" refers to bus stops and shelters, bus turnouts, and layover and turnaround places within the Project limits in and near Downtown Syracuse. While additional transit improvements are not part of the I-81 Viaduct Project, the Project would not preclude Centro or others from carrying out the transit improvements in the future, as separate, independent actions. Primarily due to spatial constraints, NYSDOT is not currently considering setting aside right-of-way for transit related projects that have no established funding. NYSDOT will continue to collaborate with Centro throughout the final design process. Reference to the term "Very Small Starts" has been removed from the FDR/FEIS.
- C 9-172: In terms of regional travel patterns and expected diversions under the Community Grid alternative, it is still not clear to the community at large how much traffic uses the existing I-81 viaduct, where that traffic originates and terminates, and how that traffic may be diverted to other routes under the Community Grid alternative.

R 9-172: Because there are thousands of origin-destination pairs in the Project's traffic study area, as well as thousands of road segments that would experience varying degrees of traffic volume changes under the Community Grid Alternative, several tables and graphics were used to summarize these effects, focusing on key locations. **Figures 5-30 and 5-31** identify where traffic displaced from the viaduct would travel under the Community Grid Alternative. **Table 5-49** presents a comparison of No Build Alternative and Community Grid Alternative traffic volumes. **Section 5.6.1, Operations (Traffic and Safety) and Maintenance** provides a description of the traffic redistribution due to removal of the I-81 viaduct. In addition, **Appendix C-3** presents projected traffic volumes for all study area intersections and freeway segments.

C 9-173: The discussion of "Alternative Routes" on DEIS page 5-2 states that "two basic trip types travel on I-81 in the Project Area": through trips and non-through trips. This is a fair assessment at the highest level, but it must be acknowledged that some of those "non-through" trips also utilize the existing I-81 viaduct.

Later in Chapter 5 (p. 5-150), the DEIS states that "most I-81 traffic is destined for Downtown and University Hill" but "most" is not quantified. How many of the non-through trips currently utilize the I-81 viaduct and what is the likely alternate route for these trips?

DEIS Figures 5-30 and 5-31 attempt to answer questions about traffic diversions under the Community Grid alternative, but these figures are difficult to interpret and leave many questions unanswered.

- We suggest that Area 5 on Figures 5-30 and 5-31 be extended to capture trips on Onondaga Lake Parkway and Old Liverpool Road. This would account for trips that might divert to Route 57, Henry Clay Blvd, or Morgan Road then use Onondaga Lake Parkway or Old Liverpool Road to access BL 81 to/from downtown and other destinations to the south.
- Area 2 should be further refined. How much of the traffic on I-81 is expected to continue utilizing BL 81 south of downtown, and how much is expected to divert to the other parallel local streets within Area 2? Splitting Area 2 into a zone just for BL 81 (comparable to Area 6) and another zone for all the other local roads would give a more accurate picture of the expected traffic pattern in this area.
- The anticipated diversion of 22-35 percent of current I-81 traffic at Screen line A to "new I-81" (i.e. current I-481) seems high, given that data collected in the "pass through study" completed as part of The I-81 Corridor Study indicated only about 6 percent of I-81 traffic passing through the region.

There is a brief statement on DEIS page 5-152 regarding this diversion: "traffic volumes on the new I-81 would increase and include additional pass-through trips that currently use northbound or southbound I-81, as well as trips to and from Westcott, Eastwood, and East Syracuse that currently use northbound I-81 to eastbound I-690 (or westbound I-690 to southbound I-81)." This use of I-81/I-690 to move between locations in the eastern and southern parts of the City needs to be explored more. Where do these trips currently get on and off the interstate system, and are they currently utilizing the viaduct? For example, a trip that gets on I-690 at Thompson Road and then uses I-81 southbound beyond the existing I-481 interchange seems likely to divert to the "new I-81." But how many trips currently travel

between the Teall Avenue exit on I-690 and the Brighton Avenue exit on I-81, for example? These trips seem unlikely to utilize I-690 EB, to “new I-81” SB, to BL 81 NB as an alternative. What would be alternate routing on local streets for those relatively short, local trips that currently utilize the viaduct?

A more complete, and more accessible, presentation of existing traffic flow patterns in the region and the expected flow patterns under the Community Grid option is needed. This is necessary both to assuage concerns about future mobility and counter arguments being made in the public that a very small number of downtown streets will be inundated by upwards of 80,000-90,000 vehicles each day.

R 9-173: **Figures 5-30** and **5-31** were developed to illustrate how passenger cars and freight that currently travel on the viaduct would be redistributed under the Community Grid Alternative. The areas have been defined to show locations where diversions principally occur. Major diversions are not expected on Onondaga Lake Parkway and this can be inferred by the figure, as the sum of diversions in the remaining areas equals 100 percent. The majority of traffic that remains in Area 2 is expected to utilize the BL 81/Almond Street corridor south of Colvin Street and disperse onto various local streets north of Colvin Street. The figures were developed to present traffic diversions as logical aggregated geographic areas or zones to facilitate conceptual understanding as graphical depictions of traffic patterns with a higher level of network fidelity and resolution are not nearly as comprehensible or legible. The percentage of traffic diversions is greater than the through trip percentage established by the Corridor Study because nearly all through trips and some additional non-through trips are diverted onto I-481 south of I-690 as traffic traveling to local destinations east of I-81 and west of I-481 are redirected onto the improved redesignated I-81 (existing I-481). These non-through trips that are redirected onto existing I-481 are comprised of an amalgamation origin and destination pairs that are comprised of portions of the neighborhoods east of University Hill as well as portions of East Syracuse among other areas and are sparsely distributed across a large number of local streets.

C 9-174: DEIS Table 5-6 lists existing 2013 traffic volumes at “key locations” but does not include the I-81 viaduct (i.e., the point on I-81 between the Adams and Harrison Street ramps), which seems like the key location in the whole study area!

AM and PM peak hour volumes are shown for this segment in Appendix C-3, so the reader is left to infer the AADT on the viaduct segment (two-way PM peak hour total of 4,523 vehicles, so probably about 45,000-55,000 vehicles per day on the viaduct?). Same comment for similar tables listing 2026 and 2056 volumes for the Alternatives.

R 9-174: The interstate locations shown in **Table 5-6** were selected such that comparisons could be made with the build alternatives and the Adams/Harrison Street location would cease to exist as a limited access highway under the Community Grid Alternative. Almond Street at Harrison Street is shown in the table as well.

C 9-175: SMTC staff reviewed Streetlight data for all of 2019 for a selection of zones on the interstate system in our region and compared these results to the information presented in the “Traffic Redistribution due to Removal of the I-81 Viaduct” section starting on p. 5-150 (and Figures 5-30 and 5-31). Our review of Streetlight data indicates the following:

- Volumes on I-81 north of I-690 are at least twice the volumes on I-81 south of I-481 (Exit 16A). And of those volumes on I-81 north of I-690, the majority (about 70 percent) get off at an exit that does not require traveling on the viaduct.
- About 45 percent of total daily trips southbound on the I-81 viaduct exit at Brighton Avenue and the same percentage of trips northbound on the viaduct get on at either Brighton or Colvin. This suggests the viaduct is being used not just for regional pass-through trips but for access to/from the south and southwest parts of the City of Syracuse or adjacent towns south/southwest of the City.
- Of the daily trips southbound using the viaduct, only about 10 percent get on I-81 north of I-481 or on NYS Route 481 and continue on I-81 south of I-481 (Exit 16A). These trips seem likely to divert to “new” I-81. (This supports the earlier conclusion about pass-through trips from The I-81 Corridor Study.)
- About 15 percent that get on I-81 somewhere between the northern I-481 interchange and State Street and exit at either Brighton Ave or Rock Cut Road.
- About 15 percent that get on I-81 between the northern I-481 interchange and State Street and continue on I- 81 south of I-481 (Exit 16A).
- About 18 percent that get on I-690 at Geddes St, West St, Teall Ave, or Midler Ave and exit at either Brighton Ave or Rock Cut Road.
- About 12 percent that get on I-690 somewhere west of Geddes St and continue on I-81 south of I-481 (Exit 16A).
- Data for northbound viaduct trips shows a similar pattern but in reverse.

Overall, the Streetlight data suggest that the viaduct is used, in large part, by local commuters making relatively short trips through the City of Syracuse or to/from nearby suburbs. Without the viaduct as the “path of least resistance” these commuters may choose entirely different routes depending on their actual origin/destination. A more straightforward graphical representation of existing flows in the region and future alternate routing (rather than the screenline diversions modeling analysis shown in Figures 5-30 and 5-31) would go a long way towards helping the public understand how their daily travel will be impacted by the Community Grid alternative.

R 9-175: Comment noted.

9-7 TOWN OF DEWITT, MULTIPLE SIGNATORIES

C 9-176: The Town of DeWitt recognizes that the I-81 project will have a sizable impact as the current I-481 bypass will become the new rerouted Interstate I-81 after its removal from the Syracuse City center. This important project has the potential to have a transformative effect on the entire region, and no other town in the region will be more impacted by the removal of I-81.

Unfortunately, the plans by NYSDOT show little attention to noise mitigation, environmental sustainability, connected community or pedestrian safety.

R 9-176: The DDR/DEIS and FDR/FEIS evaluates the potential social, economic, and environmental effects along the I-481 corridor. These include a detailed assessment of social conditions, emergency services, noise, and natural resources. Refer to **Sections 6-4-1.4.1, 6-4-6.4.1, Section 6-4-7.4.1, and Section 6-4-8.4.1** for more details.

C 9-177: The Town of DeWitt has determined the following be incorporated into the redesigned I-81 through DeWitt: the new Rt. 81 interchange must be designed with 21st century appreciation for human/community living needs; and design must be centered around human use other than cars. That is, for all modes of non-motor vehicle use -- walking, running, bicycling -- and for families with children, seniors, the disabled; everybody.

A NYSDOT interchange plan without dedicated and protected pedestrian/ bike access across Rt. 92 is not acceptable. There must be protected, grade separated, dedicated walkways, cycling paths, under- and overpasses for the human beings of Dewitt. On both sides of Rt. 92, bicycle and pedestrian access is essential. Connecting the current Erie Canal Heritage trail at Kinne Road to a future trail the length of the Feeder Canal along Butternut Drive from Kinne requires an under/overpass at East Genesee which ultimately connect to pathways at Jamesville Rd. into Jamesville and Fiddler's Green resulting in the "Green, Walkable, Bikeable Dewitt" we strive to be.

R 9-177: These improvements are beyond the scope of the Project but would not be precluded as future actions.

C 9-178: DeWitt needs modern, efficient, tastefully designed sound mitigation walls of maximum height. We insist on a state-of-the-art sound mitigation construction along the entire affected area of the new Rt. 81 in Dewitt. Any day trip down Rt. 81 through Pennsylvania, or even just up Rt. 481 in Cicero reveals many places where communities have benefitted from this. Dewitt's Rt. 481 construction left this out. We trust NYSDOT will not make the same mistake. These residential neighborhoods include DeWittshire, Orvilton, those along Maple Drive, and the Kinne/Butternut area. With the alterations of Exit 3, sound and air pollution mitigation must be installed to protect the Pickwick neighborhood.

We are aware of the limitations of using sound barriers to mitigation unwanted noise and therefore we ask that NYSDOT focus on the many other techniques that can have a more widespread positive effect such as the following: that hardwood trees be planted to handle the increased levels of carbon dioxide associated with the increased vehicular capacity.

R 9-178: As documented in **Section 6-4-6** and **Appendix H** of the DDR/DEIS and FDR/FEIS, a noise analysis was conducted for the Project in accordance with the NYSDOT Noise Policy and FHWA's highway traffic noise regulations (23 CFR 772). Noise abatement measures were assessed at the locations identified as impacted. For the Viaduct Alternative, 36 barriers and/or barrier systems were evaluated; for the Community Grid Alternative, 37 barriers and/or

barrier systems were evaluated. Under both alternatives, 15 noise barriers were found to be both feasible and reasonable, as defined in NYSDOT Noise Policy, and are recommended for construction. This includes two barriers (Barriers 7B and 8B) within the Town of DeWitt. **Section 6-4-6** documents the results of the noise abatement analysis.

The aesthetic design of the recommended noise barriers would be determined during final design in coordination with the Urban Design Technical Advisory Panel (UDTAP), which includes landscape architects, architects, and a city representative.

Regarding the planting of vegetation for noise abatement purposes, according to FHWA's "Highway Traffic Noise: Analysis and Abatement Guidance," "A 200-foot width of dense vegetation can reduce noise by 10 decibels. It is usually impossible, however, to plant enough vegetation along a road to achieve such reductions." The guidance also states "Since a substantial noise reduction does not occur until vegetation matures, the FHWA does not consider the planting of vegetation to be a highway traffic noise abatement measure." During final design, NYSDOT would coordinate with the Town of DeWitt regarding the planting of vegetation within the Project limits for aesthetic purposes.

As documented in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, air quality analyses were conducted for the Project in accordance with the established procedures in NYSDOT's The Environmental Manual, USEPA's guidance on project-level air quality analyses, and FHWA's current guidance on mobile source air toxic analysis, and utilized air quality modeling. The analyses of operational effects included a particulate matter microscale analysis, which concluded that particulate matter concentrations would be below the USEPA's National Ambient Air Quality Standards; thus, no mitigation of operational effects is warranted. **Chapter 4 (Table 4-7)** and **Section 6-4-4** of this FDR/FEIS document the air quality mitigation measures that would be implemented for the Project during construction.

- C 9-179: NYSDOT must cease using the lands of the interchange as staging and construction spoils areas and restore the neighbor-planted daffodil beds and supplant them with additional ornamental plantings.
- R 9-179: NYSDOT will consider the use of ornamental plantings, and other landscape amenities at the interchange during the final design phase.
- C 9-180: NYSDOT must implement a design incorporating pedestrian and bicycle pathways for the highway through DeWitt so that it takes on the appearance of a parkway rather than an expressway.
- R 9-180: As an interstate highway, proposed roadway improvements will conform to FHWA and NYSDOT design standards for interstates. Converting the highway from interstate to parkway design standards are outside the scope of this Project.
- C 9-181: NYSDOT must post maximum decibel reading signs on the highway.

- R 9-181: As documented in **Section 6-4-6** and **Appendix H** of the DDR/DEIS and FDR/FEIS, a noise analysis was conducted for the Project in accordance with the NYSDOT Noise Policy and FHWA's highway traffic noise regulations (23 CFR 772). Noise abatement measures were assessed at the locations identified as impacted. For the Viaduct Alternative, 36 barriers and/or barrier systems were evaluated; for the Community Grid Alternative, 37 barriers and/or barrier systems were evaluated. Under both alternatives, 15 noise barriers were found to be both feasible and reasonable, as defined in NYSDOT Noise Policy, and are recommended for construction. **Section 6-4-6** documents the results of the noise abatement analysis. The Project does not include the installation of maximum decibel reading signs; the enforcement of noise levels above the legal limit is typically done at inspection checkpoints.
- C 9-182: Drastic pedestrian improvements must be made at Lyndon Corners including well marked and possibly raised pedestrian crosswalks, pedestrian controlled traffic lights, flashing lights to signal a pedestrian crossing, etc.
- R 9-182: The I-81 Viaduct Project includes improvements at Lyndon Corners to address congestion on I-481. Other improvements at this location are not necessary to address the stated needs of the I-81 Viaduct Project. However, the Project does not preclude future improvements at this location as part of separate, independent projects.
- C 9-183: Sufficient bus infrastructure such as bus pull over areas along East Genesee Street must be installed up to Lyndon Corners to facilitate the use of BRT.
- R 9-183: These improvements are beyond the scope of the Project.
- C 9-184: All efforts must be made in the design and during construction to protect Butternut Creek and the many acres of wetlands that line the present 481. Please note the attached report to understand the sensitivity of wildlife in this area.
- R 9-184: The DDR/DEIS and FDR/FEIS contains an assessment of potential adverse effects of noise to wildlife, including birds and bats. Potential impacts of noise to federally and state-listed species in particular are evaluated in detail in **Appendices J-8 and J-7**, respectively. As discussed therein, portions of Butternut Creek and other habitats adjacent to the Project limits are already subjected to high levels of highway noise under existing conditions. As such, the composition of the wildlife communities in those areas has largely been shaped by those existing forms of noise disturbance over many years. The presence of a given species there inherently indicates habituation to, and a tolerance of, noisy, roadside conditions by those individuals.

Regarding bats, motor vehicle noise has indeed been found in some studies to interfere with foraging activity and cause avoidance of roads by some species (Schaub et al. 2008, Zurcher et al. 2010, Bennett and Zurcher 2013). However, there is also ample evidence of bats habituating to high levels of noise disturbance and inhabiting chronically noise-polluted habitats. Federally endangered Indiana bats, for example, are known to inhabit construction

sites, major airports, and other extremely noisy areas (Sparks et al. 1998, Keeley and Tuttle 1999, Shapiro and Hohmann 2005, Niver 2009). Continued roosting of Indiana bats following the start of new construction activity has been observed and demonstrates an ability to acclimate to novel disturbances (ESI 2008, USFWS 2011). Foraging behavior of Indiana bats has also been found to be unaffected by extremely loud noises and reverberations, such as artillery fire on military bases (Shapiro and Hohmann 2005). Federally threatened northern long-eared bats have similarly been known to occur in areas with substantial noise and vibration levels, such as at major airports (Sparks et al. 1998) and under bridges (Feldhamer et al. 2003), which demonstrates that they too can be tolerant of chronic anthropogenic noise and reverberations if the habitat is otherwise suitable.

Sounds generated by heavy construction equipment typically fall well below the hearing and echolocation frequency ranges of bats, which may largely explain this tolerance of loud noises (Delaney and Grubb 2004, Niver 2009). Higher frequency noises, like those of cars and light trucks, are what have been found to interfere with the foraging behavior of *Myotis* bats (Schaub et al. 2008, Zurcher et al. 2010, Bennett and Zurcher 2013), but as noted above, the Project areas are already subjected to chronic highway noise. Operation of the Project would not change the acoustic environment from existing conditions in a way that could differently affect bats. Through the installation of noise barriers in some areas in which there currently are none, the Project will actually reduce existing levels of highway noise that reach parts of Butternut Creek. For all of these reasons, discussed in detail in the DDR/DEIS and FDR/FEIS and its appendices, construction and operation of the Project are not expected to cause significant noise-related impacts to wildlife.

Coordination with USFWS and NYSDEC regarding federally and state-listed species has been ongoing throughout the preparation of the DDR/DEIS and FDR/FEIS. Throughout the life of the Project, NYSDEC and USFWS will continue to be consulted to ensure that appropriate measures are implemented to protect bats, birds, and other wildlife during construction and operation of the Project (see **Appendix J-7 and J-8** for a full list of references).

9-8 TOWN OF DEWITT, SUPERVISOR

- C 9-185: The comment period was not long enough to provide adequate review of the voluminous documents and properly address the multitude of issues and concerns, nor provide specific comments on the document narrative.
- R 9-185: In accordance with FHWA's regulations for implementing the National Environmental Policy Act (23 CFR 771), a public comment period of 60 days was initially established for review of the DDR/DEIS. In response to public comments requesting additional time to review the DDR/DEIS, FHWA and NYSDOT extended the public comment period an additional 30 days.
- C 9-186: I oppose the plan to eliminate the north-south connection of Route 81 through the City of Syracuse. The conversion of Route 481 into Route 81 will be detrimental to DeWitt neighborhoods due to significantly increased traffic on Route 481 and on DeWitt's secondary

County and Town roads, thereby resulting in significantly increased air and noise pollution. The conversion of Route 81 into a business loop will be detrimental to Syracuse southside and northside neighborhoods due to separation, significantly increased traffic on neighborhood secondary streets, thereby resulting in significantly increased air and noise pollution. In addition, the selected option, the community grid, will have negative economic, social, and environmental impacts on a regional scale. The CNY community will suffer over the long term by disconnecting Route 81 through the City of Syracuse. The proposed project(s) will have severe negative social, economic, and environmental impacts on DeWitt and CNY far into the future.

- R 9-186: Based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the project alternatives; public and agency input; and national, State, and local environmental protection goals, the FHWA and NYSDOT have identified the Community Grid Alternative as the Preferred Alternative for the Project (see **Section 8.3** of the DDR/DEIS and FDR/FEIS). The DDR/DEIS and FDR/FEIS documents the assessment of the full range of potential social, economic, and environmental effects of the Project. Specifically, **Section 6-2-3** documents the assessment of effects to environmental justice populations; **Section 6-4-4** and **Appendix G** document the air quality analyses for the Project; **Section 6-4-6** and **Appendix H** document the noise analyses for the Project; and **Section 6-3-2** documents the assessment of economic effects for the Project. Where adverse effects are identified, measures to mitigate those effects are documented (see **Chapter 6**).

NYSDOT has considered the potential for changes in traffic within Central New York using the I-81 Project Travel Demand Model, and the potential effects of the Community Grid Alternative on traffic are disclosed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS. Also, see responses to comments in Section 6, Transportation of this appendix regarding traffic considerations.

- C 9-187: The proposed community grid works against sustainability principles on a regional scale, for instance, by disconnecting direct routes, isolating existing neighborhoods, causing the traveling public to drive greater distances and redirecting vehicles through at-grade City streets, increasing fuel consumption, air pollution, and ultimately exacerbating climate change.
- R 9-187: The traffic analysis indicates that the transportation system, including the roadway network within Downtown Syracuse and existing I-481 (which would be re-designated as I-81), would operate at acceptable Levels of Service under the Community Grid Alternative (see **Section 5.6.1**). The air quality analysis also found that the Community Grid Alternative would not result in adverse impacts related to emissions. The Project has been developed in alignment with the principles of the Smart Growth Public Infrastructure Policy Act. The Community Grid Alternative would improve existing infrastructure in the City's municipal centers, strengthening the existing communities in these centers with improved transportation infrastructure including facilities that promote sustainable (pedestrian and bicycle) traffic modes. Refer to **Appendix D-3** for the Smart Growth Screening Assessments.

C 9-188: NYSDOT has spent over a decade promoting the removal of Route 81 through the City of Syracuse and the accompanied conversion of Route 481 into Route 81 without conducting a regional transportation study. By confining the study area to the one and one-half mile stretch of Route 81 elevated highway and constraining the scope of the analyses, NYSDOT limited the study findings. The outcome of a biased study can be predetermined by a flawed study design and inappropriate hypothesis testing: NYSDOT structured the wrong hypothesis as “What should be done with a short segment of elevated highway within the City of Syracuse?” Hence, NYSDOT failed to evaluate other problematic highway segments and additional highway needs throughout CNY. A regional evaluation of transportation needs for the future of CNY would have developed a multifaceted strategy addressing a variety of road and neighborhood improvements throughout CNY. Results and outcomes would likely be entirely different than the current community grid as a standalone project.

R 9-188: In 2009, NYSDOT conducted a transportation feasibility study of the I-81 corridor in Onondaga County. In 2013, the feasibility study concluded that the most significant transportation asset requiring new solutions was the I-81 viaduct downtown. In August 2013, the Notice of Intent was published in the Federal Register to initiate the environmental review process for the I-81 Viaduct Project and start developing alternatives for the Project in consideration of public and agency input. The purpose and need of this Project was developed to address the structural and geometric deficiencies of the existing viaduct.

To evaluate the potential social, economic, and environmental effects of the Project, the Project Area includes four separate study areas: Central Study Area; I-481 South Study Area; I-481 East Study Area; and I-481 North Study Area. Each study area includes the Project limits of the subarea as well as a ¼-mile area surrounding the Project limits unless otherwise specified. For some topics—such as air quality, noise, cultural resources, traffic, and others—a special study area is defined for consistency with regulatory requirements or to capture a larger or smaller area of potential effects for the Project. The Project's traffic study area includes all areas that may experience traffic-related impacts and is sufficient to evaluate the effects of the Project on traffic operations. Beyond these limits, the Project would not affect traffic flow as substantial travel pattern changes due to the Project would occur within these limits only.

NYSDOT has considered the potential for changes in traffic within broader Central New York using the I-81 Project Travel Demand Model, and the potential effects of the Community Grid Alternative on traffic are disclosed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS. Also, see responses to comments in Section 6, Transportation of this appendix regarding traffic considerations.

Based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the project alternatives; public and agency input; and national, State, and local environmental protection goals, the FHWA and NYSDOT have identified the Community Grid Alternative as the Preferred Alternative for the Project (see **Section 8.3** of the DDR/DEIS and FDR/FEIS). The DDR/DEIS and FDR/FEIS documents the assessment of the full range of potential social, economic, and environmental effects of the

Project. In addition, the Project has been developed in alignment with the principles of the Smart Growth Public Infrastructure Policy Act. The Community Grid Alternative would improve existing infrastructure in the City's municipal centers, strengthening the existing communities in these centers with improved transportation infrastructure including facilities that promote sustainable (pedestrian and bicycle) traffic modes. Refer to **Appendix D-3** for the Smart Growth Screening Assessments.

- C 9-189: The environmental review process has had a predetermined outcome: I was invited as DeWitt Supervisor and attended a NYSDOT Stakeholder Meeting in Lafayette Town Hall on the evening of September 17, 2009, along with Mr. Kerry Mannion, Deputy Supervisor, Mr. Michael Lazar, Chair of DeWitt Planning Board, and Mr. Richard Robb, Director of Planning, Development and Operations in DeWitt. Representatives from the Syracuse Metropolitan Transportation Council (SMTC) and NYSDOT were present. It was at this meeting that we were first introduced to the notion that Route 81 would be dropped to ground level through the center of Syracuse and Route 481 would become Route 81, CNY's only major north-south federal freeway. We were told by NYSDOT representatives that CNY's population "was too small to maintain two federal highways". Later, on the ride back to DeWitt, Mr. Lazar concluded "that it was a done deal". It was apparent then, and it is evident now, that the decision was made prior to conducting the process; perhaps by a higher office in state government than that of NYSDOT.
- R 9-189: In 2009, NYSDOT was in the process of conducting a transportation feasibility study of the I-81 corridor in Onondaga County. In 2013, the feasibility study concluded that the most significant transportation asset requiring new solutions was the I-81 viaduct downtown. In August 2013, the Notice of Intent was published in the Federal Register to initiate the environmental review process for the I-81 Viaduct Project and start developing alternatives for the Project in consideration of public and agency input. Based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the Project alternatives; public and agency input; and national, State, and local environmental protection goals, FHWA and NYSDOT have identified the Community Grid Alternative as the Preferred Alternative for the Project (see **Section 8.3** of the DDR/DEIS and FDR/FEIS). The DDR/DEIS and FDR/FEIS document the assessment of the full range of potential social, economic, and environmental effects of the Project.
- C 9-190: Because Route 81 is part of the federal highway system, it belongs to the citizens and business enterprise of the United States. It services the traveling public, including out-of-state citizens, in addition to serving national defense, international trade, interstate shipping, business and commerce. Each of these items is an important factor in establishing the federal highway system. Each of these areas warrants an in-depth evaluation of the local, regional, and national impacts of disconnecting Route 81 through Syracuse. Each of these topics and others should be part of the discussion, and should be addressed in the DEIS, and each should have been topics included in a comprehensive regional transportation study.

- R 9-190: The entire BL 81 corridor will remain part of the Federal Highway System. The freeway sections of BL 81 will function like and Interstate system with controlled access, no at grade intersections, and high speeds similar to existing conditions.
- C 9-191: The conversion of Route 81 to a business loop through the City of Syracuse will potentially weaken national defense, particularly amongst deployments in the northeast. Currently both Route 81 and Route 481 serve as conduits for military purposes. Should an enemy or terrorist group disable one route the other can be utilized in its stead.
- R 9-191: Routing I-81 along the existing I-481 would maintain north-south interstate travel through Syracuse and Central New York. This re-routing of I-81 would add approximately three miles of travel distance, which would not impede national defense systems. Additionally, BL 81 would still remain an expressway for about 11 of its 12 miles, which would allow for alternate travel, if needed. Routing I-81 along the existing I-481 would maintain north-south interstate travel through Syracuse and Central New York. The northern and southern I-81/I-481 interchanges would be improved to allow vehicles to maintain 65 mph speeds on the redesignated I-81 (existing I-481) section; current speeds on I-81 in Downtown are 45 mph. Additionally, BL 81 will still remain a high-speed freeway for about 11 of its 12 miles, which would allow for alternate travel, if needed.
- C 9-192: Several primary options have been looked at to date: a tunnel, depressed highway, elevated highway, and a community grid. Very few, if any, favor maintaining the status quo. The current elevated highway configuration is unacceptable for the future, and is counter to securing a walkable, more densely populated, and sustainable downtown. Clearly, the construction of the original viaduct in the 1960's destroyed the 15th ward neighborhood and caused irreparable damage to families and thriving businesses; accompanied deed records and the practice of redlining are further evidence of systemic racism.
- R 9-192: Comment noted.
- C 9-193: The tunnel option was dismissed by NYSDOT due to costs and geologic conditions. However, a localized box tunnel option was never included in the analysis. A box tunnel could be installed at relatively low cost and adequately address poor geologic substrates. Further a box tunnel or series of box tunnel sections could easily be incorporated into a depressed highway design. The box tunnel highway option has a distinct advantage of requiring that nearby underground public utilities such as gas and electric, and municipal infrastructure such as sewer and water would be rebuilt.
- R 9-193: As detailed in **Section 3.3** and **Appendix B-1**, FHWA and NYSDOT evaluated and screened a range of potential alternatives and considered their ability to meet the Project objectives, constructability, and potential property impacts in addition to cost. As discussed in the April 2015 Scoping Report, the Tunnel Alternatives (T-1, T-2, T-3, and T-4) were evaluated, screened, and dismissed from further study. In response to public input after the publication of the Scoping Report, and as described in the Tunnel Feasibility Study (see **Appendix B-2**

of the DDR/DEIS and FDR/FEIS), FHWA and NYSDOT conducted additional engineering and further analyses to determine whether a tunnel alternative that satisfies the Project's needs, meets the Project's purpose and objectives, and meets the established screening criteria could be developed.

Three new potential tunnel alternatives (T-5, T-6, and T-7) were developed (see the Tunnel Feasibility Study in **Appendix B-2**) and dismissed. In addition, the I-81 Independent Feasibility Study, conducted by an independent consultant, considered a long list of alternatives consisting of two potential depressed highway alternatives along the existing I-81 corridor and seven potential tunnel alternatives with various options. Based on the recommendation of this independent study, NYSDOT developed the Orange tunnel concept, which was also dismissed from further consideration (**Appendix B-3** contains the independent consultant's report, and **Appendix B-4** contains the results of the further study conducted by NYSDOT). Therefore, a tunnel alternative was deemed not reasonable and was dismissed from further consideration.

- C 9-194: The depressed highway option has distinct advantages such as allowing the secondary cross streets to maintain connections between both sides of the highway. A depressed highway would require rebuilding Syracuse's underground public utilities and municipal infrastructure, which is sorely needed. A depressed highway could accommodate the community grid by incorporating "shelves," with street level traffic extending over the depressed highway. A depressed highway would work well in combination with a box tunnel or perhaps a series of box tunnels, particularly located at cross secondary streets.
- R 9-194: Potential Depressed Highway Alternatives were previously considered for the Project. However, both Depressed Highway Alternatives would remove local street connections thus decreasing connectivity, involve unfavorable subsurface conditions during construction, and would require the relocation of all utilities. Further, the potential Depressed Highway Alternatives would not meet the project purpose and objectives, nor would they address the identified transportation needs. For these reasons, the potential Depressed Highway Alternatives were not recommended for further study in the DDR/DEIS and FDR/FEIS as presented in both the Scoping Report (April 2015) and in **Sections 3.2.5** and **3.3.1** of the DDR/DEIS and FDR/FEIS.
- C 9-195: The elevated highway option also presents advantages; it could take a different route through the City, be a different height, could allow for the community grid and new buildings and green space underneath. Architect Steve Buechner has put forth an excellent proposal (Moriarty 2019, "Architect resurrects I-81 central park proposal, adds sailboat bridge" <https://www.syracuse.com/news/2019/02/architect-resurrects-i-81-central-park-proposal-adds-sailboat-bridge.html>, Syracuse.com, Feb. 6). An innovative elevated highway design could be architecturally unique, visually appealing, or even iconic. Combining infrastructure with public open space like the Presidio in San Francisco is not only aesthetically pleasing, but it can also become a tourist attraction and often supports increased real estate values.

- R 9-195: Please see responses to **Comments 5-10** and **5-17** in Section 5 of this appendix.
- C 9-196: While highways are unappealing and often look alike, bridges can be used to create identity and establish a sense of place. Bridges often “brand” a City. If we envision the 1.5-mile section through Syracuse as a bridge, that section of highway could be a unique landmark and help define the City’s skyline.
- R 9-196: Please see response to **Comment 9-242** in Section 5 of this appendix.
- C 9-197: It is incumbent upon our federal representatives, Senator Charles E. Schumer, Senator Kirsten E. Gillibrand, and Congressman John M. Katko, to obtain the necessary federal funds to implement a project that serves the greatest number of citizens, stakeholders, and interested parties. The community grid option alone supports a strong and powerful minority of institutions and entities at the expense of the majority.
- R 9-197: NYSDOT in cooperation with FHWA has prepared the DDR/DEIS and FDR/FEIS for the I-81 Viaduct Project. FHWA serves as the Federal Lead Agency, and NYSDOT serves as the joint lead agency progressing the development of the EIS. Neither NYSDOT nor FHWA controls the magnitude of federal funding levels apportioned to states or when federal funding becomes available for transportation projects. The selection of the Community Grid Alternative as the preferred alternative was based on a careful consideration of the potential social, economic, and environmental effects of all alternatives studied.
- C 9-198: Why sell CNY and the future short? Why not think big? Are we not worthy of the best option for the future? And why hasn’t there been any discussion of a regional mass transit system that would relieve pressure on our highways? Why not light rail transit? A mass transit system would also support our very serious poverty issue, providing affordable transportation for low wage earners and helping the jobless get to available jobs outside of their local area. At a minimum, a regional rapid bus transit should be part of the long-term comprehensive plan and implemented across CNY. It would also support a reduction in our use of fossil fuels. The best long-term option for CNY should include mass transit. Perhaps a solar powered electric train system could be planned, designed, and constructed over the next generation. I want my grandchildren to view burning fossil fuels as we view riding horses. We have the technology, but lack the vision and political will.
- R 9-198: A stated objective of the Project is to “maintain access to existing local bus service and enhance transit amenities within the Project limits in and near Downtown Syracuse.” “Transit amenities” refers to bus stops and shelters, bus turnouts, and layover and turnaround places within the Project limits in and near Downtown Syracuse. NYSDOT will continue to coordinate with Centro on potential transit amenities as the Projects moves into the final design phases. In addition, NYSDOT considered the potential effects on public transit, pedestrians, and bicyclists for both build alternatives (see **Sections 6-2-2.3.1** and **6-2-2.4.1**).

Other transit improvements are not part of the I-81 Viaduct Project, although the Project would not preclude Centro or others from carrying out transit improvements in the future, as separate, independent actions.

- C 9-199: NYSDOT has recently spent years rebuilding, restoring, rehabilitating and reconditioning the approaches to the elevated highway designated for removal. The previous recent work on the approaches to the area proposed for the community grid was a clear signal from NYSDOT that other alternatives or options were not to be selected because significant investment has been made in locations that now would be required to be removed and replaced should another alternative be selected. For instance, the approach to an iconic bridge would likely need to meet at higher elevations which would need greater distance to meet the desired elevation. Likewise, the option of a box tunnel, depressed highway or some combination would need lower elevations on the approach and would also need greater distance because the approach to these other options cannot be made in the distances allowed within the current infrastructure. The road elevations, heights, widths, and supports do not permit a re-engineering of the larger system on a scale necessary to accommodate a continued connection across the one and one-half mile elevated highway study area.
- R 9-199: I-81 and I-690 were constructed in the 1950s and 1960s and much of the highway/bridge sections has been rehabilitated or reconstructed/replaced to keep the transportation systems safe and reliable for the users of each Interstate. The I-81 viaduct in downtown Syracuse has been rehabilitated multiple times to maintain the structures in a state of good repair. **Section 3-2** of the DDR/DEIS and FDR/FEIS includes all other potential alternatives studied throughout the preliminary design phases and does include multiple bridge concepts, depressed highways, tunnels and other concepts.
- C 9-200: The community grid option standalone has been accepted by many based on the assumption nearly all commuters are headed downtown. NYSDOT published in earlier documents that about 88% of the traffic on Route 81 heading towards Syracuse from either the northern or southern intersections with Route 481 did not exit at the opposite Route 481 intersection. The implication is two-fold. The first, based on a false and misleading assumption that over three fourths of the travelers using Route 81 are heading downtown and the second, predicated on the first, that only 12 percent of I-81 traffic is through traffic, therefore assuming minimal traffic impacts to Route 481 and DeWitt. The data used for these assumptions are suspect and were collected for a short duration that excludes the seasonal migration of snowbirds to the south, and possibly more important, the summer recreational and vacation travel throughout central and northern NY.

Another critical misconception is that everyone stays in the workplace for eight hours. That has never been less true. With the new “gig” economy, more and more workers are mobile throughout the day. The ability to travel quickly and efficiently is critical for postal carriers, package delivery, repair and medical services, students, IT and maintenance workers, vendors, and suppliers. Many scoff that the added 5 to 10 minutes per commute is nominal; but there are those whose work week will expand, costs will increase, due to hours of lost

productivity. The collective effect will add to inflate prices and dampen an already weak local economy. The most vulnerable will be impacted the most. Further, the proliferation of internet purchasing necessitates the transportation of goods and services be dependable and rapid. Adopting a plan that works against the demands of e-commerce is a mistake, especially in trying to attract and recruit new business to the CNY region.

R 9-200: The Community Grid Alternative was developed using a regional travel demand model that considers the changes in travel patterns that would result as a consequence of changes to the transportation network. The travel demand model uses census data and socioeconomic data regarding the spatial distribution of employers and residents to forecast changes in traffic patterns based on actual settlement and commuting patterns in the Syracuse metropolitan area. It is these travel demand forecasts which were used to prepare the traffic studies on which the Community Grid Alternative is based. In addition to trips to and from work, the travel demand model also accounts for recreational or non-work based trips that are captured in the forecast volumes. The traffic study for the Project was performed for the AM and PM peak periods because these times define the critical analysis periods where traffic demand is highest, thereby driving the design. Refer to **Chapter 5** of the DDR/DEIS and FDR/FEIS for further details on the traffic studies.

C 9-201: Proponents cite social justice as the rationale for supporting the community grid, but the community grid option alone will serve to disconnect Syracuse neighborhoods from the CNY highway transportation network, further isolate southside neighborhoods economically, and socially contribute to the food desert phenomenon in areas away from downtown. Commuters coming from the south destined for the hospitals, university, or downtown will still be traveling the same Route 81 approach only now a business loop. Residents along and near South State Street, Garfield Avenue, Leon Street, South McBride Street, Oakwood Avenue, and others will still be impacted by commuters heading to the hospitals, Syracuse University, downtown offices, government, businesses, and beyond.

The community grid will not provide relief to existing neighborhoods. In fact, plans have already identified removal and displacement of the residents of Pioneer Homes. New housing along the grid, just as that comprising the “downtown housing renaissance,” will likely gentrify the near downtown neighborhood at a price beyond that which would benefit the underserved communities of the Southside. Not long ago 14 of the area’s most prominent developers penned an editorial in support of the community grid. While a strong Syracuse urban core is important to the overall health of CNY, developers will be quick to capitalize on downtown revitalization. No real project or plan to benefit Southside residents has been put forth to date.

R 9-201: As documented in **Chapter 3** of the DDR/DEIS and FDR/FEIS, NYSDOT undertook a comprehensive and objective evaluation of a multitude of concepts (potential alternatives) in establishing a reasonable range of alternatives for the Project. As a result of this effort, the No Build Alternative, Viaduct Alternative, and Community Grid Alternative were studied in the EIS.

As documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, the removal of highway infrastructure and reduction of the transportation footprint under the Community Grid Alternative, along with related transportation and urban design improvements, would help reconnect neighborhoods on both sides of I-81 and I-690. Traffic would be redistributed on the new BL 81/Almond Street and other local streets. Most of this traffic is, and would continue to be, destined for locations within the City of Syracuse; however, instead of funneling traffic to the limited number of I-81 exit ramps that exist today, the Community Grid Alternative would create more direct routes between the new BL 81 and I-690 to more efficiently serve local traffic.

Street improvements would be included where needed, such that there would not be a notable degradation of level of service on these streets. Pedestrian and bicycle facilities would be added at several locations, including along Almond Street, which would be reconstructed. In total, the Community Grid Alternative would result in approximately 12.5 miles of new or reconstructed sidewalks, 2.0 miles of new or reconstructed shared use (bicycle and pedestrian) paths, one mile of new cycle track (a separate track for bicyclists only), and 1.7 miles of new or reconstructed shared vehicle and bicycle lanes. The Community Grid Alternative would not displace any residents, including residents of the Pioneer Homes.

As documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, implementation of the Community Grid Alternative could result in 10 to 12.5 acres of potential surplus transportation right-of-way. Regarding the disposition of this right-of-way, NYSDOT would form a land use working group consisting of representatives from the City, the City's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel. Any new use or development would be subject to the City of Syracuse's zoning ordinance and its Land Use and Development Plan 2040 currently being updated by the ReZone Syracuse project.

- C 9-202: The community grid will negatively impact the quality of life for thousands of individuals who will lose significant time, which will negatively impact the local economy and people's lives socially. The estimated collective lost time for 60,000 commuters is an individual equivalent of 438.36 years (3,840,000 hrs/yr) in a single year, and 13,150.7 years (115,200,000 hrs/30 yr) over the course of 30 years. However, actual lost time could be more than 20 percent greater, and these numbers do not include added idling time to traffic navigating across the community grid. The impact to commerce and business is expected to be far worse. For mail carriers, package deliveries, business suppliers, and other mobile enterprises, the work week will expand, and costs will increase due to thousands of hours of lost productivity.
- R 9-202: The change in travel time between various origins and destinations would vary—some would increase, some would decrease, and others would remain essentially unchanged. The largest projected travel time increases would be approximately five or six minutes and would mostly involve trips to and from areas south of Syracuse. As discussed in **Section 5.6.1** of the

DDR/DEIS and FDR/FEIS and as shown in **Table 8-2**, the trips between the majority of origins and destinations (60 to 70 percent) would experience either no change or a decrease in travel time under the Community Grid Alternative compared with the No Build Alternative in the 2056 analysis year. Travel times between most of the other origins and destinations would increase by one or two minutes. Fewer than 10 percent of motorists would experience travel time increases greater than three minutes. Therefore, these travel times would not have an adverse impact on the local or regional economies (see **Section 6-3-2** for further discussion).

Furthermore, as documented in **Section 6-2-1** of the DDR/DEIS and FDR/FEIS, the removal of highway infrastructure and reduction of the transportation footprint under the Community Grid Alternative, along with related transportation and urban design improvements, would help reconnect neighborhoods on both sides of I-81 and I-690. Traffic would be redistributed on the new BL 81/Almond Street and other local streets. Most of this traffic is, and would continue to be, destined for locations within the City of Syracuse; however, instead of funneling traffic to the limited number of I-81 exit ramps that exist today, the Community Grid Alternative would create more direct routes between the new BL 81 and I-690 to more efficiently serve local traffic. Street improvements would be included where needed, such that there would not be a notable degradation of level of service on these streets.

- C 9-203: The community grid will increase time and mileage for a majority of commuters, in addition to added idling time to traffic diverted onto the grid, all of which greatly increases fuel consumption. The collective annual gasoline consumption for 60,000 commuters will be 12,000,000 gallons. The average worker with an added 10-mile commute will pay an additional \$600 for gasoline each year (assuming \$3.00 per gallon for an added 200 gallons) on top of their existing fuel bill. Approximately one-third of the residents in the City of Syracuse live in poverty, as do one in two children. Such additional fuel costs will have a negative effect on these residents, not to mention the business community that will pass costs along to consumers through rising prices for goods and services. The community grid option alone will result in a significant negative overall impact on the local economy.
- R 9-203: The traffic study performed for the Project indicates that the majority of commuters would not experience increases in travel time because the proposed transportation improvements would improve critical freeway corridors to eliminate current sources of congestion while providing convenient access points connecting the freeway system to major traffic generators. See **Section 5.6.1** of the DDR/DEIS and FDR/FEIS and **Table 8-2** for additional details.
- C 9-204: The overall environmental impact of the community grid will be negative because of increased vehicle use, which will result in the emission of pollutants including nitrogen oxides (NO_x), volatile organic compounds (VOCs), carbon monoxide (CO), carbon dioxide (CO₂), particulates, sulphur dioxide (SO₂) and lead. The average worker with an added 10-mile commute will burn an additional 200 gallons of gasoline each year thereby producing an extra 4000 lbs of CO₂, 840 lbs of toxic gases (NO_x, VOCs, CO, and SO₂) annually over that already being generated.

The primary human health effects associated with the increased by-pass traffic that will be generated on the Route 481 corridor are traffic noise pollution and air pollution. Automobile air pollution is a major environmental risk factor in the incidence and progression of diseases such as asthma, lung cancer, ventricular hypertrophy, Alzheimer's and Parkinson's diseases, psychological complications, autism, retinopathy, fetal growth, and low birth weight. Air pollution is also a leading cause of climate change, acid rain, freshwater eutrophication, ocean acidification, wildlife extinction, and ozone depletion.

- R 9-204: The Community Grid Alternative would result in an overall net reduction of vehicle miles traveled within the study area when compared to the No Build Alternative by approximately 4,163,044 miles per year within the year of completion and 5,683,886 within the design year (see **Table 6-4-4-10** in **Chapter 6-4-4, Air Quality**). Changes in traffic patterns would affect air quality. Regional (mesoscale) emissions resulting from the No Build, Viaduct, and Community Grid Alternatives were evaluated based on regional traffic modeling that estimated future Build year traffic volumes using the Syracuse Metropolitan Transportation Council's regional travel demand model. The model predicts traffic volumes as a result of the anticipated changes in land use, population, economic activity, and transportation system. Future traffic and emissions of pollutants associated with vehicle volumes are projected to increase on individual roadway segments that would become the preferred routes. However, there would also be areas where traffic signal or changes in lane geometry would improve travel speeds and traffic operations. Consequently, vehicle emissions are projected to decrease on these segments and would offset segments with increased emissions within the region.

Emission factors used in the analysis for criteria pollutants were obtained using EPA's MOVES2014a model for Onondaga County and were calculated and summarized by roadway type, vehicle type and speed for running exhaust, brakewear, tirewear, and where appropriate by pollutant, evaporative permeation, evaporative fuel vapor venting, and evaporative fuel leaks. The average vehicle speeds and vehicle classifications for the AM and PM peak periods projected in the regional transportation analysis were used to calculate emission factors along individual roadway segments, and the estimated annual vehicle miles traveled by vehicle type and speed-based emission rates by link that were specific to each alternative. The roadway segments include the I-81, I-690, I-481, and I-90 interstate systems and surface streets that could be affected by the project. The modeled traffic network extends south to East Castle/Stratford Streets, north to Hiawatha Boulevard, west to South West Street, and east to Westcott Street (see Figure 1 of **Appendix C-2**), and consist of the area where a shift in local traffic using alternate routes could occur as a result of the reconstruction of the I-81 viaduct.

Daily emissions were developed by multiplying the average projected daily traffic volumes of individual segments by the length of each modeled segment and the calculated speed-based emission factors. Regional emissions associated with the Project were then projected as the summation of all roadway emissions within the study area and reported in **Table 6-4-4-9** for the Community Grid Alternative in **Chapter 6-4-4, Air Quality**. Furthermore, a particulate matter (PM) microscale analysis was conducted at four representative intersections for the Community Grid Alternative using NYSDOT, FHWA, and U.S. Environmental Protection

Agency (USEPA) procedures. The analysis was performed using the USEPA emissions model MOVES2014a and dispersion model CAL3QHCR. Sites were selected for analysis based on projected traffic conditions, the introduction of new and/or modified roadways, the proximity to sensitive receptors, and if sites would be located within environmental justice communities. The analyses concluded that PM concentrations would be below the USEPA's National Ambient Air Quality Standards. Therefore, there would be no potential for adverse air quality impacts for the Community Grid Alternative.

- C 9-205: Those that benefit from the community grid alone will be a select minority of stakeholders including Syracuse University, Upstate Medical Center, and a few developers. Future development along the community grid has been cited as a major benefit of the community grid, and many have touted the tax revenue that will increase significantly to the City of Syracuse from future development. However, much of land is owned by non-profits that do not pay property taxes or owners that receive tax relief through payments in lieu of taxes (PILOT) agreements. Syracuse University, Upstate Medical Center, associates of New York State Housing, Hutchinson Psychiatric Center, and other non-profits currently own many parcels along and near Almond Street and collectively these institutions are looking to possibly develop and expand further into downtown.

The irony is the social justice arguments used to justify the community grid will have a negative impact on minority and underserved populations closest to downtown. Pioneer Homes and Mulberry Square will likely be displaced as current residents will be gentrified out of their homes. Those dwelling in the Southside and Valley neighborhoods will still experience the negative impacts of commuter traffic to the hospitals, University, and downtown offices as tens of thousands of commuters will still traverse the Route 81 business loop and past their neighborhoods at 65 mph.

- R 9-205: **Section 6-3-2.4** of the DDR/DEIS and FDR/FEIS describe the potential direct, indirect, and cumulative effects of the Community Grid Alternative on economic conditions in the Central Study Area. As stated in **Section 6-3-2.4.1**, much of the housing near the viaduct is publicly owned and/or subsidized property with rent protection for its occupants, and the Community Grid Alternative would not displace any residents through property acquisition. The DDR/DEIS and FDR/FEIS also disclose the specific business displacements resulting from the Community Grid Alternative, and the process NYSDOT would follow to inform occupants and assist in their relocation. Furthermore, the DDR/DEIS and FDR/FEIS describe the potential surplus transportation right-of-way that could become available for development or other use under the Community Grid Alternative once transportation infrastructure is removed (refer to **Section 6-2-1.4.3**). The dispersion and limited size of these sites, as well as the predominance of publicly owned lands and land held by large institutions, would limit potential indirect displacement due to rising rents or increased property values.

- C 9-206: NYSDOT is shifting the economic capital of CNY away from the City of Syracuse and into DeWitt, which is poised to become the crossroads of the major federal highway system in CNY, where Route 81, Route 690, and the New York State Thruway (Route 90) will converge.

In addition, State Route 173, Route 92, Route 5, Route 635, Route 290, and Route 298 all cross DeWitt and contact one of the major Federal highways. With the connections between air shipping, rail freight, and highway transport, DeWitt will be the central locale for the movement of goods and services in and out of CNY. The long-term economic impact on business and industry in DeWitt will be beneficial. Yet these benefits are far outweighed by the overwhelmingly negative effects to DeWitt neighborhoods, the City of Syracuse and the CNY region.

- R 9-206: **Section 6-3-2** considers the potential for induced economic growth as a result of the project alternatives. The projected changes in travel patterns with the Community Grid Alternative are not expected to result in the long-term economic shift described by the commenter. The Community Grid Alternative would divert some of the existing north-south traffic from the existing I-81 corridor to I-481 (see **Chapter 5, Transportation and Engineering Considerations, Tables 5-51 and 5-52**). This could modestly increase the consumer base of, and demand for, new highway-oriented development at the six existing I-481 interchanges. These are Interchange 2 at Jamesville Road, Interchange 3 at East Genesee Street, Interchange 4 at I-690, Interchange 5 at Kirkville Road, Interchange 6 at I-90, and Interchange 7 at Collamer Road. Any development near these interchanges would be subject to local zoning and approvals by the Town of DeWitt. The area near Interchange 2 is mostly zoned R-1, permitting single-family residential uses. Therefore, substantial development from the Community Grid Alternative would be unlikely in this area. East Genesee Street at Interchange 3 is zoned Special Business Transitional to the east of I-481 and Business Transitional to the west of I-481. This area is currently characterized by highway commercial businesses, including retail centers, banks, and grocery stores. Land just to the north and south of East Genesee Street is zoned for single family residential. Therefore, any new development induced by the Community Grid Alternative would likely be infill development consisting of smaller-scale, highway-oriented retail and service business uses. Interchange 4 east of I-481 is zoned Industrial, which permits a variety of uses including manufacturing, warehousing, retail, and vehicle service station uses. Any potential development adjacent to this interchange spurred by the Community Grid Alternative would likely consist of smaller-scale highway-oriented retail and service business uses. West of I-481 is primarily zoned for single-family residential uses. Therefore, new development is not anticipated in that area. The area in the vicinity of Interchanges 5, 6, and 7 is zoned Hi-Tech, which allows for many different uses including office, industrial (manufacturing and distribution), hotels, nursing and senior care facilities, and retail. Drive-thru facilities are permitted by Special Permit. Therefore, the Community Grid Alternative could support new highway-oriented businesses in the vicinity of these interchanges.
- C 9-207: In addition to those concerns and issues expressed for the City of Syracuse and the CNY region, the Town of DeWitt's concerns are related to the effects that the potential rerouting of Route 81 to the Route 481 corridor would have on the character of the Town's neighborhoods and important open space systems. The Town of DeWitt's 2002 Comprehensive Plan

identifies the I-481 corridor as a significant barrier within the Town but also identifies the Butternut Creek corridor adjacent to Route 481 as a conservation area.

- R 9-207: Elements of the Community Grid Alternative within the Town of DeWitt would be within the transportation right-of-way and would not result in adverse effects on neighborhoods, community cohesion, or open space systems in this area (see **Section 6-2-1.4** of the DDR/DEIS and FDR/FEIS.
- C 9-208: The Town of DeWitt requests that NYSDOT consider the redesign of the Route 481 and East Genesee Interchange to adequately and safely accommodate pedestrians and bicyclists. Accommodations for pedestrian and bike paths should be designed at all town exit and entrances.
- R 9-208: Accommodations for pedestrian and bike paths at all town exits and entrances are beyond the scope of this Project; however, they would not be precluded as a future action by others.
- C 9-209: The Town of DeWitt requests sidewalk and bicycle path construction along major state routes throughout DeWitt in accordance with NYSDOT policy. The Town is willing to provide maintenance and snow removal via in-kind service and labor and is willing to enter into contract agreements with NYSDOT. Areas in further need of sidewalks include but are not limited to Erie Boulevard (Route 5), Thompson Road (Route 635), Bridge Street, Route 92, Route 173, Route 290 and Route 298.
- R 9-209: The installation of sidewalks throughout the Town of DeWitt on state highways is outside the scope of the Project but can be considered as part of future NYSDOT projects. Installation of sidewalks on Erie Boulevard will be completed in 2022 via the Pedestrian Safety Action Plan Project currently under construction. The installation of bike paths at these locations within the Town of DeWitt is outside the limits and scope of the I-81 Viaduct Project. This does not preclude installation of bike paths at these location by NYSDOT or others in the future.
- C 9-210: NYSDOT performed sound modeling for the DEIS, but the model results are inaccurate and inadequate, and a comprehensive sound measurement study should be conducted to obtain concrete data for DeWitt.
- R 9-210: As documented in **Section 6-4-6** and **Appendix H** of the DDR/DEIS and FDR/FEIS, a noise analysis was conducted for the Project in accordance with the NYSDOT Noise Policy and FHWA's highway traffic noise regulations (23 CFR 772). As described in **Section 6-4-6**, traffic noise modeling was conducted at 2,817 receivers (representing 4,563 receptors) within the established study area, including receivers along the existing I-481 within the Town of DeWitt. Noise abatement measures were assessed at the locations identified as impacted. For the Viaduct Alternative, 36 barriers and/or barrier systems were evaluated; for the Community Grid Alternative, 37 barriers and/or barrier systems were evaluated. Under both alternatives, 15 noise barriers were found to be both feasible and reasonable, as defined in NYSDOT Noise Policy, and are recommended for construction. This includes two barriers (Barriers 7B and

8B) within the Town of DeWitt. **Section 6-4-6** documents the results of the noise abatement analysis.

C 9-211: Sound barriers are necessary to protect DeWitt neighborhoods from increased noise levels. In particular, the Jonathan-Craig and Dewittshire neighborhoods are already exposed to extreme levels and constant highway noise. DeWitt neighborhoods should be afforded sound protection irrespective of moving Route 81 to Route 481. Sound attenuation such as natural berms with plantings in open greenspace would be the preferred treatment. Sound barrier walls such as those along Route 81 in Binghamton with translucent panels allowing light and vision would be preferable in locations unable to accommodate a natural berm with plantings.

R 9-211: As documented in **Section 6-4-6** and **Appendix H** of the DDR/DEIS and FDR/FEIS, a noise analysis was conducted for the Project in accordance with the NYSDOT Noise Policy and FHWA's highway traffic noise regulations (23 CFR 772). Noise abatement measures were assessed at the locations identified as impacted. As documented in **Section 6-4-6**, the abatement measures that were considered included traffic management measures; alteration of horizontal and vertical alignments; acquisition of property rights (either in fee or lesser interest) for construction of noise barriers; construction of noise barriers; and acquisition of real property or interests therein (predominantly unimproved property) to serve as a buffer zone to pre-empt development that would be adversely impacted by traffic noise. The NYSDOT determined that the most effective method of noise abatement for the Project would be the construction of noise barriers. The use of earthen berms instead of noise barriers was dismissed from consideration due to the amount of land area required for such berms, which generally cannot be accommodated within the limited space of a highway right-of-way.

For the Viaduct Alternative, 36 barriers and/or barrier systems were evaluated; for the Community Grid Alternative, 37 barriers and/or barrier systems were evaluated. Under both alternatives, 15 noise barriers were found to be both feasible and reasonable, as defined in NYSDOT Noise Policy, and are recommended for construction. This includes two barriers (Barriers 7B and 8B) within the Town of DeWitt. **Section 6-4-6** documents the results of the noise abatement analysis.

The aesthetic design of the recommended noise barriers would be determined during final design in coordination with the Urban Design Technical Advisory Panel (UDTAP), which includes landscape architects, architects, and a city representative.

Regarding the planting of vegetation for noise abatement purposes, according to FHWA's "Highway Traffic Noise: Analysis and Abatement Guidance," "A 200-foot width of dense vegetation can reduce noise by 10 decibels. It is usually impossible, however, to plant enough vegetation along a road to achieve such reductions." The guidance also states, "Since a substantial noise reduction does not occur until vegetation matures, the FHWA does not consider the planting of vegetation to be a highway traffic noise abatement measure." During final design, NYSDOT would coordinate with the Town of DeWitt regarding the planting of vegetation within the Project limits for aesthetic purposes.

- C 9-212: Urban and suburban forestry resources should be enhanced along the Route 481 corridor as part of this transportation project. It has been demonstrated that urban forests can improve air quality by reducing atmospheric carbon dioxide levels and absorbing a wide range of air pollutants. The citizens of the Town of DeWitt deserve the inclusion of these mitigation strategies in the overall community grid option. The use of Urban or Suburban forestry practices to help mitigate serious air pollution and noise impacts associated with the transportation project will represent an extraordinary investment in helping to preserve the quality of life.
- R 9-212: As documented in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, air quality analyses were conducted for the Project in accordance with the established procedures in NYSDOT's The Environmental Manual, USEPA's guidance on project-level air quality analyses, and FHWA's current guidance on mobile source air toxic analysis and utilized air quality modeling. The analyses of operational effects included a particulate matter microscale analysis, which concluded that particulate matter concentrations would be below the USEPA's National Ambient Air Quality Standards; thus, no mitigation of operational effects is warranted. **Chapter 4 (Table 4-7)** and **Section 6-4-4** of the DDR/DEIS and FDR/FEIS document the air quality mitigation measures that would be implemented for the Project during construction.
- Regarding the planting of vegetation for noise abatement purposes, according to FHWA's "Highway Traffic Noise: Analysis and Abatement Guidance," "A 200-foot width of dense vegetation can reduce noise by 10 decibels. It is usually impossible, however, to plant enough vegetation along a road to achieve such reductions." The guidance also states, "Since a substantial noise reduction does not occur until vegetation matures, the FHWA does not consider the planting of vegetation to be a highway traffic noise abatement measure." During final design, NYSDOT would coordinate with the Town of DeWitt regarding the planting of vegetation and urban/suburban forestation within the Project limits for aesthetic purposes.
- C 9-213: Exit 3 at East Genesee St: NYSDOT's proposal to remove the westbound cloverleaf exit and add additional lanes and a traffic light intersection with two lanes heading east and two lanes heading west is woefully inadequate. The Town of DeWitt requests a diverging diamond interchange.
- R 9-213: The analysis completed as part of the Project has determined that the proposed improvements would improve I-481 operations by reducing an existing crash pattern and easing congestion issues along the Route 5/92 corridor. See **Chapter 5** of the DDR/DEIS and FDR/FEIS for additional information.
- C 9-214: The signage along Route 481 needs an upgrade. The Town of DeWitt would be able to help support this effort. Signage could be developed ranging from the initial "Welcome to the Town of DeWitt," to additional signage regarding available services. The AAA suggests mile markers, exit signs, state highway signs and the signature identification of the communities through which they pass.

- R 9-214: Signs in the I-481 corridor would be updated to standards, including the possibility of mile markers, Tourist Oriented Direction signs (where appropriate), and municipal boundary signs.
- C 9-215: Exit at Kirkville Road: A direct connection from Route 481 into the CSX Inland Port railyards is imperative. Reconfiguration of the Kirkville Road exit ramps with traffic lights is required for safe access to a service road for trucks only entering and exiting the railyards. Perhaps a diverging diamond interchange would work at this location. This is best accomplished near the current highway footprint due to wetland and floodplain issues. Trucks currently use Kirkville Road and Fremont Roads and traverse the entrances of an East Syracuse-Minoa Elementary School, Middle School, and High School. The ESM District Bus Garage is proximate to the railyards. The co-mingling of hundreds of tractor trailer trucks and multiple dozens of school buses can and should be avoided.
- R 9-215: The CSX Inland Port is a separate, independent project and the developers will be responsible for mitigating their own impacts.
- C 9-216: Additional entrance ramp: The Town of DeWitt currently has a right of way to Route 481 off Towpath Road. The installation of a southbound entrance ramp just south of Kinne Road would alleviate rush hour traffic and aid in removing out-bound traffic from Glacier Creek Park, Widewaters Office Park, BlueCross Blue Shield, Shoppingtown Mall future development, Marshall's Plaza and other multiple nearby office parks and shopping centers.
- R 9-216: An additional on-ramp in this area is too close in proximity to adjacent interchanges and could cause operational and safety issues on I-481.
- C 9-217: Route 690 extension: Currently East Genesee Street to Lyndon Corners and Routes 5 and 92 serve as the Route 690 extension. East Genesee Street has up to 10 lanes of traffic along this corridor, with hundreds of thousands of cars traversing our town daily. DeWitt would like road reduction and a traffic diet through our Town. This is not an unreasonable request it follows the same logic as taking Route 81 down through the City of Syracuse. If the City of Syracuse does not have to allow traffic on a major interstate highway to run north south through its jurisdiction, then why should DeWitt accommodate commuter traffic between the City of Syracuse and the easternmost suburbs? DeWitt is requesting Route 690 be extended eastward through the Town of Manlius and as far east as Chittenango. Route 690 was originally designed to extend into the eastern suburbs and the interchange between Route 690 and Route 481 is still in place. At a minimum, NYSDOT could utilize the existing interchange between Route 690 and Route 481 to provide entrance and exit to and from the two highways from Butternut Drive. Further, an at-grade road similar to Northern Boulevard should be extended eastward at a minimum to Burdick Avenue in the Town in Manlius. This would help to relieve traffic on both Route 290 and East Genesee Street.
- R 9-217: Extending I-690 to Chittenango is not within the scope of this Project, nor would it be necessary to meet the Project purpose and objectives or address the identified transportation needs.

- C 9-218: NYSDOT is proposing amenities to the Onondaga Creekwalk within the City of Syracuse. We concur that alternative transportation paths such as bike lanes and walkable trails are important. The Town of DeWitt would like equal treatment as the City of Syracuse, especially because NYSDOT is shifting the major federal interstate highway system for CNY through DeWitt. The Route 481 corridor parallels the Butternut Creek floodplain of which the Town has made numerous investments in green space, parklands, bike paths and trails. Several of these projects have been completed, initiated, or have commenced planning or are conceptual and have been included in our comprehensive plan, parks and recreation master plan, climate action plan, and/or are contained in DeWitt's Local Waterfront Revitalization Plan (LWRP).
- R 9-218: Additional amenities within the Town of DeWitt's Local Waterfront Revitalization Plan are outside the scope of the I-81 Viaduct Project. This does not preclude implementation of amenities by NYSDOT or others in the future.
- C 9-219: Widewaters Pond: The Town of DeWitt is working to establish a pocket park along the National Heritage Erie Canal Trail at the intersection of Bridge Street and Erie Boulevard. The Town is requesting to acquire Widewaters Pond from NYSDOT, similar to the process being conducted with NYSDOT for property acquisition for the Town's Butternut Creek Park. I thank NYSDOT for its continued good faith effort in working through this process with DeWitt. DeWitt also requests NYSDOT dredge the Widewaters Pond. Widewaters Park is envisioned to include water fountains, colored decorative lighting, a boardwalk, benches, and other amenities.
- R 9-219: NYSDOT is committed to working with the Town of DeWitt concerning their request to transfer ownership of Widewaters Pond. Dredging the pond would be considered under the terms of any potential property transfer and would be subject to an evaluation of engineering, social, economic, and environmental consequences under applicable federal and state environmental regulations and permit requirements. Dredging this pond will not be performed as part of the I-81 Viaduct Project as this work is beyond the identified Project scope and work limits and does not address the Project's identified purpose, needs, and objectives.
- C 9-220: Erie Canal restoration: The Town of DeWitt owns a remnant of the former Erie Canal between Widewaters Pond and Route 481 and is looking to restore this section of the canal. DeWitt requests NYSDOT dredge the former canal along towpath Drive along with Widewaters Pond, thereby restoring the Erie Canal as a waterway from nearby Kinne Road to Erie Blvd. NYSDOT should also install a barrier wall separating the canal and the Erie Canal Heritage Trail from neighborhood backyards. The Town would work with property owners and NYSDOT to establish easements and install vegetative plantings to buffer homeowner's backyards along the entire barrier wall.
- R 9-220: The Erie Canal restoration work falls outside the limits and scope of the I-81 Viaduct Project. This does not preclude the Erie Canal restoration work by NYSDOT or others in the future.

C 9-221: East Genesee Street Box Tunnel Path: Butternut Creek flows through a set of three box tunnels underneath East Genesee Street in DeWitt and the eastbound Fayetteville off-ramp and northbound on-ramp at the intersection with Route 481. The project proposes to construct a pedestrian/bike path under East Genesee Street and the northbound on-ramp to Route 481. The proposed path would provide crosswalk connections between east-west sidewalks along Genesee Street and the existing Butternut Creek trail, and two future trails proposed in a north-south orientation on both sides of Route 481 connecting all neighborhoods and businesses between East Genesee Street southward to the hamlet of Jamesville.

Permits would be required from NYSDOT, NYSDEC, and USACE. Construction would include the placement of large stones under the highways at the creek's edge along the easternmost wall of the two box tunnels and placing a concrete slab on top forming the trail. Amenities would include LED solar lighting, safety railing, signage, and trail connections including contour earth moving, filter fabric, crushed limestone (crusher run/runner crush), and stone dust for about 800 linear feet of trail.

R 9-221: The East Genesee Street box tunnel path work falls outside the scope of the I-81 Viaduct Project. This does not preclude the work to be done by NYSDOT or others in the future.

C 9-222: Trailways: The Town of DeWitt envisions a network of trailways along the west side of Route 481—East Genesee Street to Kinne Road, Jamesville Rd to East Genesee Street, and Woodchuck Hill Rd at Jamesville Rd to East Genesee Street—each requiring amenities such as LED solar lighting, safety railing, signage, and trail connections including contour earth moving, filter fabric, crushed limestone (crusher run/runner crush), and stone dust trail (including connections). An additional trailway from Route 173 to Jamesville Road would pass through Fiddlers Green and would require donation from Hansen Quarry along the east side of Butternut Creek from Solvay Road to pump house. Two paths are envisioned for this trailway, as is construction of a public amphitheater at the eastern side of the landfill.

R 9-222: The different trail sections are outside the limits and scope of the I-81 Viaduct Project. This does not preclude the creation of various trails by NYSDOT or others in the future. Creation of a public amphitheater is outside the scope of the I-81 Viaduct Project. This does not preclude the creation of an amphitheater by others in the future.

C 9-223: Beautification: The Town of DeWitt requests a number of aesthetic improvements to state-owned routes within DeWitt; the Town is willing to partner via monetary contributions and/or in-kind labor services. NYSDOT should remove the asphalt and install plantings on the islands on Erie Boulevard, East Genesee Street, and Thompson Road; replant daffodils within the four cloverleaves at Exit 3 on East Genesee Street; and vegetate the entire Route 481 median through DeWitt with a crown-vetch or clover plant.

R 9-223: Beautification to State routes not within the Project limits will not be included in the scope of work. Removing asphalt and vegetating the islands on Erie Boulevard, East Genesee Street, and Thompson Road is outside the scope of the I-81 Viaduct Project. This action does not

preclude landscaping of other State-owned routes by NYSDOT or others in the future. NYSDOT will consider landscaping improvements in the Project during final design.

C 9-224: Maintenance and drainage issues: The Town is requesting cooperation with NYSDOT on a host of road maintenance and drainage issues on state roads and easements throughout the Town. The Town is willing to contribute in-kind service and labor in exchange for permission and/or contract agreements to aid NYSDOT in weed control and water runoff. Areas include, but are not limited to Erie Boulevard, Thompson Road, Bridge Street, Route 173, Route 290 and Route 298.

R 9-224: Drainage improvements throughout the town are beyond the scope of the Project but would not be precluded as a future action.

C 9-225: I-81 SEQOR Review Comments from DeWitt Town Engineer & DeWitt Highway Superintendent
From Town Engineer:

- Urban forestation in and around the DeWitt interchanges starting at Jamesville Rd past the Lyndon interchange to the connection points of I 690
- Sound barriers required for the areas in and around the DeWitt interchanges starting at Jamesville Rd past the Lyndon interchange to the connection points of I 690
- Incorporation of direct access to the East Syracuse Rail Yards at the Kirkville Road interchange per attached sketches which the Town has initiated for funding purposes
- Incorporation of trail systems currently proposed with local comprehensive planning and local waterfront revitalization along interstate access areas in and around the DeWitt interchanges starting at Jamesville Rd past the Lyndon interchange to the connection points of I 690
- Calming effects, urban forestation, and improvements for Route 5 corridor from Orvilton hamlet to Lyndon Corners
- Urban forestation and plantings for clover leaf area at Route 5 interchange. Plantings by Town Volunteers have been decimated by NYSDOT activities over the years. Development of a dedicated planting scheme is requested
- Funding for increased use of NYS Bike Trail for Town including modifications to the feeder canal pond at Erie and Celi Drive
- Traffic impacts to roads such as Woodchuck Hill, Jamesville Road, Old Quarry, Maple Drive Nottingham need to be addressed in emergency situations. Roads do not have carrying capacities
- Noise barriers required in and around the DeWitt interchanges starting at Jamesville Rd past the Lyndon interchange to the connection points of I 690
- Increased emergency responder activity. Funding and resources required for increased activity
- Increased truck traffic on local Roads require upgrades to several local and county Roads such as Kirkville, Fly, Jamesville, Nottingham

- Air monitoring stations throughout the residential areas in and around the DeWitt interchanges starting at Jamesville Rd past the Lyndon interchange to the connection points of I 690
- Protection of natural trout streams adjacent to the modified interstate along Butternut Creek
- Increased education for natural habitat in the fragile Butternut Creek stream drainage area including increased salt use
- No anticipation for direct ramp access to the rail yard or increased truck traffic from such in the design report
- Increased traffic means increased accidents. Town of Dewitt has limited number of emergency responders. Potentially a new station and staff may be needed.
- Where are the massive numbers of workers going to stay.
- Where are the large equipment and material staging areas going to be located.
- MPT will be complex and lead to
- Will there be winter shutdowns or will bridge reconstruction continue without interruption. New spurs for the Empire Trail heading north to Route 298 and south to Jamesville Road from the current 481 bridge crossing should be incorporated along the new I-81 Route
- All utilities should be replaced from under the pavement in Lyndon Corners widening area.
- Addition of new traffic signal at Genesee Street will add to travel times and congestion.
- Noise mitigation
- No significant fueling stations along the current Route 481 corridor. Need for fuel will increase.
- No rest/texting area planned along the current new I-81 Route
- Need for mechanical service stations along the new I-81 Route will increase.
- Noise mitigation should be incorporated □ Pollution mitigation should be incorporated
- Cost estimates are low based upon recent bidding of public work projects.

From DeWitt Highway Superintendent:

- A bypass that was talked about for the Eastern Suburbs years ago, this would help elevate the increased traffic for Lyndon Corners
- Traffic increasing for Orvilton Drive & Thompson Roads
- Shoulder improvements, Bike Lanes & or Sidewalks (Maintenance) to allow for Pedestrian Safety
- Sound Barrier maintenance after being built, cost to the Town?
- Sound Monitoring due to increased traffic
- Road Conditions will increase by the wear & tear of increased traffic

R 9-225: Regarding the planting of vegetation, during final design, NYSDOT would coordinate with the Town of DeWitt regarding plantings plans and urban forestation within the Project limits; the planting of vegetation beyond the project limits is outside the scope of the Project.

Regarding noise abatement/barriers, please refer to the related responses above to other Town of DeWitt comments. The recommended noise barriers would be constructed within NYSDOT right-of-way and maintained by NYSDOT.

Regarding air quality monitoring, as documented in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, the analyses of operational air quality effects included a particulate matter microscale analysis, which concluded that particulate matter concentrations would be below the USEPA's National Ambient Air Quality Standards. Thus, no mitigation of operational effects is warranted. **Chapter 4 (Table 4-7)** and **Section 6-4-4** of the DDR/DEIS and FDR/FEIS document the air quality mitigation measures that would be implemented for the Project during construction.

Regarding effects to streams, **Section 6-4-7** of the DDR/DEIS and FDR/FEIS documents potential effects and mitigation measures to surface water bodies, including Butternut Creek.

The other requests are outside the scope of the Project, but would not be precluded as potential separate, independent actions in the future.

9-9 U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)

- C 9-226: In accordance with its responsibilities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act, USEPA has reviewed the DDR/DEIS, focusing on the Preferred Alternative, its potential impacts and proposed mitigation methods. We acknowledge that the modifications proposed as part of the Community Grid Alternative would alleviate traffic congestion, safety issues and rectify aging infrastructure, as well as enhance connectivity and distribute traffic into the downtown area. Based on our review of the DDR/DEIS and participation in agency and public meetings, we submit the following comments intended to be consistent with USEPA's ongoing work and commitment to support local communities and reduce environmental impacts.
- R 9-226: Comment noted.
- C 9-227: USEPA recommends that a summarized impacts/mitigation chart be included in the FEIS Executive Summary to clarify potential impacts to public due to robustness of the DEIS.
- R 9-227: The Executive Summary in the FDR/FEIS has been revised to include a summary table.
- C 9-228: USEPA concurs with the purpose and need as outlined in the DEIS with respect to NEPA guidelines as well as the analysis for choosing the preferred alternative, given historical context of mid-century U.S. highway construction and its disproportionate impact on communities of color and communities plagued by poverty.
- R 9-228: Comment noted. As documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, neither project build alternative would result in disproportionately high and adverse effects to low-income and/or minority (environmental justice) communities. As stated in **Section 6-2-3**, the

Community Grid Alternative would benefit land uses and community cohesion in the Environmental Justice Study Area as compared to the No Build Alternative since the existing I-81 viaduct, a perceived barrier, would be removed from the railway bridge near Renwick Avenue to I-690. The Community Grid Alternative would address deficiencies in the vehicular, pedestrian, and bicycle networks and enhance connectivity. The removal of highway infrastructure and reduction in the transportation footprint, along with related transportation and urban design improvements, would help reconnect neighborhoods on both sides of I-81 and I-690.

- C 9-229: USEPA appreciates the use of the plethora of visual aids throughout the DEIS, particularly maps and renderings of current conditions and proposed conditions to help the public envision the future of I-81. We recommend that more visual aids are used to explain the impacts on surrounding communities in the study area (i.e., comparison charts, quantitative studies, public comments received during hearings, etc.).
- R 9-229: NYSDOT worked to include a multitude of visual aids (e.g., visualizations, maps, figures, tables) in the EIS document and each chapter begins with a text box that briefly describes what is contained in the chapter. The project website also provides visual aids, such as a video and renderings of the Community Grid alternative and the presentations (with sign language and Spanish-language interpretation) from the Project public hearings. During the DDR/DEIS public comment period, a “virtual project information room” was available on the Project website, which provided display boards, presentations, and videos about the Project. As requested by USEPA in a separate comment, the Executive Summary in this FDR/FEIS has been revised to include a summary table. Also, a visualization of the proposed roundabout at Van Buren Street (under the Community Grid Alternative) was developed and included in this FDR/FEIS. NYSDOT will continue to utilize visual aids throughout the course of the Project.
- C 9-230: USEPA acknowledges mitigation efforts intended to minimize the potential adverse effects of construction activities on the community including development and implementation of a traffic management plan, dust control plan, air quality monitoring program and noise and vibration abatement and monitoring program. In developing mitigation strategies, USEPA recommends that FHWA make concerted efforts to reduce impacts to schools and hospitals located adjacent and in proximity to the construction areas. For example, time of day considerations may limit the impact of construction on nearby schools and day care facilities.
- R 9-230: The areas surrounding the existing I-81 and I-690 corridors include residences, Dr. King Elementary School, hospitals/medical facilities, and Wilson Park. Thus, as described in **Chapter 4 (Table 4-7)** of the DDR/DEIS and FDR/FEIS, NYSDOT would require its contractors to implement strict containment and mitigation measures during construction activities. These measures include locating diesel-powered engines away from building air conditioners and windows; limiting idling time for diesel-powered equipment; time-of-day restrictions for noisy activities; and the implementation of air quality, noise and vibration monitoring programs within the overall construction limits for the Project. To mitigate

construction noise, Contractors would be required to implement both source control and path control measures (see **Table 4-7** of this FDR/FEIS). Source control involves controlling a noise source before it is able to emit potentially offensive noise levels, such as restricting the use of impact and drilling equipment when reasonable and requiring well-maintained mufflers on equipment. Path control involves measures that control the path of the noise, such as installing temporary physical noise barriers and/or noise curtains. In the construction zone between MLK, Jr. East and Harrison Street, the contractor would be directed to use saw cutting methods and prohibit impact hammers during the demolition of existing structures when reasonable, and to use drilled foundations on all bridge piers and other support structures and prohibit pile driving methods. This zone includes facilities that are extremely sensitive to construction noise and vibration, such as the surgery center at the Upstate Medical facility. Also, as described in **Chapter 3** of this FDR/FEIS, based on public input received during the DDR/DEIS public comment period, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East in the vicinity of Dr. King Elementary School as part of the Community Grid Alternative. By eliminating the roundabout in this location, the proposed transportation system (and associated construction activities) would be moved as far away as practicable from the school. The duration of construction in this location would also be reduced.

- C 9-231: During a public meeting it was referenced that Wilson Park would be used as a staging area during construction. We recommend that the park be included as a location that will not be used as a staging location for equipment, and where additional measures will also be taken to ensure that recreational users of the park are not affected by construction (debris, noise, etc.).
- R 9-231: As documented in **Section 6-4-2** and **Chapter 7** of the DDR/DEIS and FDR/FEIS, the easternmost portion of Wilson Park currently encroaches on NYSDOT right-of-way and this area would be used by NYSDOT to demolish the viaduct. As shown on **Figure 6-4-2-3** in **Section 6-4-2**, NYSDOT has determined the limit of disturbance will be at the blue "ROW Line," which further minimizes impact to the park. In addition, a 20-foot-wide adjacent strip, or 0.12 acres, of Wilson Park outside of the state right-of-way would be inaccessible (for less than one year) during the construction period of the Community Grid Alternative to serve as a safety buffer between the section of the park that would remain open and the construction zone. The Contractor would install fencing around this buffer area. The buffer area includes one of the two existing basketball courts at the park, as well as a section of grassy area. NYSDOT would provide a new basketball court prior to construction, so that two courts would be available during construction and three would be available in the permanent condition. The use of 0.12 acres constitutes a small section of the 2.1-acre park, and the inaccessibility would be temporary.

Additional improvements include adding a third hoop and backboard in the new court; adding benches in the new court; planting new shade trees; installing a new water fountain in the basketball court area; a new splash pad; paving new paths to provide access from Jackson Street; improving fencing and pedestrian gates; and improving parking amenities. These park

improvements were discussed and developed in coordination with the City of Syracuse Department of Parks, Recreation and Youth Program and Syracuse Housing Authority. Once construction is complete, the affected existing basketball court would be reconstructed, and the adjacent lawn area would be graded and reseeded. Thus, upon completion of construction, Wilson Park would be returned in its entirety to park users, in an improved condition and with additional recreational facilities. No change in ownership would occur.

During final design and construction, NYSDOT would continue to coordinate with the City of Syracuse Department of Parks, Recreation and Youth Program and Syracuse Housing Authority regarding construction activities and the improvements to Wilson Park.

C 9-232: USEPA appreciates that NYSDOT plans to implement measures during construction to minimize vibration between MLK, Jr. East and Harrison Street given this vibration can be detrimental to residents. We recommend limiting construction during school hours near the school, as this could be distracting for and harmful to students. Design workflow to ensure that any especially loud construction near schools occurs in the hours outside of school day. Use best practices for noise barriers that were explored in the analysis including temporary noise barriers, noise insulation of buildings, and buffer zones.

R 9-232: The areas surrounding the existing I-81 and I-690 corridors include residences, Dr. King Elementary School, hospitals/medical facilities, and Wilson Park. Thus as described in **Chapter 4 (Table 4-7)** of the DDR/DEIS and FDR/FEIS, NYSDOT would require its contractors to implement strict containment and mitigation measures during construction activities. Measures that would be implemented to mitigate construction noise include time-of-day restrictions for noise activities; temporary noise abatement measures, such as the use of shrouds or other noise curtains, acoustic fabric, soundproof housings, physical barriers and/or enclosures to reduce noise from loud equipment; requirements for vehicles and equipment to reduce noise; designated truck routes; and the implementation of a noise and vibration monitoring program within the overall construction limits for the Project. Contractors would be required to implement both source control and path control measures (see **Table 4-7** of this FDR/FEIS). Source control involves controlling a noise source before it is able to emit potentially offensive noise levels, such as restricting the use of impact and drilling equipment when reasonable and requiring well-maintained mufflers on equipment. Path control involves measures that control the path of noise, such as installing temporary physical noise barriers and/or noise curtains. In the construction zone between MLK, Jr. East and Harrison Street, the contractor would be directed to use saw cutting methods and prohibit impact hammers during the demolition of existing structures when reasonable, and to use drilled foundations on all bridge piers and other support structures and prohibit pile driving methods.

Also, as described in **Chapter 3** of this FDR/FEIS, based on public input received during the DDR/DEIS public comment period, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East in the vicinity of Dr. King Elementary School as part of the Community Grid Alternative. By eliminating the roundabout in this location, the proposed transportation system (and associated construction activities) would be moved as far away as

practicable from the school. The duration of construction in this location would also be reduced.

NYSDOT would continue to coordinate with the Syracuse City School District during construction. During final design, NYSDOT would consider implementing additional construction restrictions within the construction zone near Dr. King Elementary School, such as time and/or seasonal restrictions where appropriate. **Sections 6-2-1 and 6-2-3** of this FDR/FEIS have been revised to reflect this.

- C 9-233: USEPA commends the thorough traffic analysis conducted using best available data and resources. However, in the traffic analysis, there is a note that projections were reduced by 20 percent to account for increased telecommuting and public outreach/transportation management planning. Please provide additional information on how these percentages were determined. In addition, subsequent sections involving the parking analyses applied a 25 percent reduction due to telecommuting. Please account for this discrepancy and provide justification for why the same reductions were not applied.
- R 9-233: In addition to a traffic demand reduction of 10 percent to account for increased telecommuting in the future, a 10 percent global reduction factor was applied to account for changes in driver behavior typically experienced in response to public outreach and transportation management planning efforts as travelers alter their commuting patterns, forgo trips, or choose alternative travel options as a result of the construction. Therefore, a total reduction of 20 percent was assumed, considering both increased telecommuting and public outreach efforts such as travel advisories. See **Section 5.5.1** of this FDR/FEIS for further details. With respect to parking, the 25 percent reduction proposed in the DDR/DEIS has been eliminated, and the FDR/FEIS shows 100 percent mitigation of lost public parking. See **Section 5.6.1** of this FDR/FEIS for further discussion of parking-related issues.
- C 9-234: The FEIS should explicitly state whether traffic has moved closer to nearby schools and homes and indicate where concentrations of mobile source air toxins would be higher under each of the different build alternatives. This would be helpful in considering specific mitigation measures in these locations.
- R 9-234: As documented in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, the mobile source air toxics (MSAT) analysis for the Project was conducted in accordance with FHWA's "Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents" (2016). As per that guidance, a qualitative assessment of MSAT emissions projections was conducted for the Project, as both build alternatives would have design-year annual average daily traffic of less than 140,000 vehicles. As documented in **Section 6-4-4**, MSAT emissions would be proportional to the VMT for the No Build and Build Alternatives for a given year when variables such as fleet mix remain similar. The VMT between the No Build and Community Grid Alternatives varies by approximately 0.1 percent. Thus, it was concluded that there would be no appreciable difference in overall MSAT emissions between the No Build and Community Grid Alternatives in the analysis years. As per FHWA's MSAT guidance, dispersion modeling

of MSATs was not conducted for the Project. Please note that, although not required, dispersion modeling of particulate matter (PM₁₀ and PM_{2.5}) was conducted for the Project, as documented in **Section 6-4-4**.

- C 9-235: Syracuse is currently designated as an attainment area for all criteria pollutants, meaning their concentrations are below the National Ambient Air Quality Standards (NAAQS). However, these pollutants can still impact human health and the environment, and can cause problems such as asthma, heart disease, and low birth weight. The City of Syracuse has the highest percentage of low birthweight births compared to the rest of New York State. The rate of emergency department (ED) visits for asthma per 100,000 for children aged 0-4 years is also highest in Syracuse compared to the rest of the state (City of Syracuse's Health Equity Report 2017).

USEPA recommends that the air quality should continue to be monitored and mitigated throughout construction. Mitigation measures include the use of Ultra Low-Sulfur Diesel, limiting idle time for diesel powered engines, dust control, restrictions on burning of materials, and protection systems/techniques when drilling, cutting, etc. In addition, USEPA recommends use of Tier 4 rated diesel-powered equipment during construction to minimize any localized Particulate Matter 2.5 (PM_{2.5}) concentrations that might affect nearby communities.

- R 9-235: As described in **Chapter 4 (Table 4-7)**, **Section 6-2-3**, and **Section 6-4-4** of this FDR/FEIS, an outdoor ambient air quality monitoring program and the other air quality mitigation measures specified in the comment would be implemented during construction of the Project and overseen by NYSDOT. Regarding the use of Tier 4 rated diesel-powered equipment, **Section 6-4-4** and **Table 4-7** of this FDR/FEIS have been revised to include the following construction mitigation measure: "Utilization of construction equipment that meets Tier 4 emissions standards, where appropriate and to the extent practicable." Also, as stated in **Section 6-4-4** and **Table 4-7**, the Contractor would use Ultra Low Sulfur Diesel (ULSD) fuel to operate all diesel engines.

The outdoor ambient air quality monitoring program would consist of real-time particulate monitoring at a number of locations within the local community, including locations within the environmental justice community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design.

Background particulate monitoring would be conducted as part of the program to establish and routinely verify baseline levels. During construction, real-time particulate matter data would be collected at an established interval (for example, measurements every 10 seconds and logged in 15-minute periods) and time-weighted over 24 hours for comparison to the USEPA's National Ambient Air Quality Standards (NAAQS). These standards are designed to protect public health, including the health of sensitive populations such as asthmatics,

children, and the elderly, with an adequate margin of safety. If the data show that air quality levels are approaching a concern level (to be established during final design) that could result in an exceedance of the 24-hour NAAQS, then operational and/or mechanical deficiencies would be identified and corrected. If the data result in any particulate air quality levels that exceed the 24-hour NAAQS, then the applicable construction activities would be suspended until the deficiencies are identified and corrected.

This FDR/FEIS has been revised to include the above information, including the commitment to locate a monitor outdoors in the vicinity of Dr. King Elementary School.

As documented in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, the air quality analyses for the Project were conducted in accordance with the established procedures in NYSDOT's The Environmental Manual, USEPA's guidance on project-level air quality analyses, and FHWA's current guidance on mobile source air toxic analysis, and utilized air quality modeling. Air quality monitoring was not conducted. Both construction-related and operational-related (i.e., after construction) air quality effects were assessed.

The analyses for construction activity included a particulate matter (PM_{2.5} and PM₁₀) microscale analysis. As documented in **Sections 6-2-3** and **6-4-4** of this FDR/FEIS, the Martin Luther King, Jr. East area, which is within an environmental justice community, was selected as the representative location for analysis. **Section 6-4-4** of this FDR/FEIS present the results of the analysis. As shown, the particulate matter concentrations would be below the NAAQS.

The analyses of operational effects also included a particulate matter (PM_{2.5} and PM₁₀) microscale analysis. As documented in **Sections 6-2-3** and **6-4-4** of this FDR/FEIS, the following four sites were selected for analysis for the Community Grid Alternative: Crouse Avenue and Burnet Avenue to Crouse Avenue and Erie Boulevard; North West Street and West Genesee Street; Almond Street and Harrison Street; and State Street and Erie Boulevard. Each of these four sites is located within an environmental justice community. These sites were selected based on projected traffic conditions, the introduction of new/modified roadways, and the proximity to sensitive receptors. **Section 6-4-4** and **Appendix G** of this FDR/FEIS present the results of the analysis. As shown, the particulate matter concentrations at the analysis sites would be below the NAAQS. Thus, adverse effects related to particulate matter concentrations are not anticipated.

As documented in **Section 6-4-4**, for the analysis of operational effects, the particulate matter concentrations at each of the analysis locations under the build alternatives were also compared to the No Build Alternative. The results for the analysis of the Community Grid Alternative are documented in **Section 6-4-4** and also copied below. As shown, the concentrations would be lower at some of the analysis sites and higher at some of the analysis sites as compared to the No Build Alternative.

PM_{2.5} and PM₁₀ Maximum Concentrations at Analysis Sites (µg/m³)

Analysis Site	Pollutant	Averaging Period	Background Concentration	No Build Alternative Total Concentration	Community Grid Alternative Total Concentration	Percent Change	NAAQS
Site 1: Crouse Avenue and Burnet Avenue to Crouse Avenue and Erie Boulevard	PM ₁₀	24-Hour	33.0	43.0	44.7	3.9%	150
	PM _{2.5}	24-Hour	13.5	14.5	15.3	5.1%	35
		Annual	5.6	5.9	6.2	4.5%	12
Site 2: N. West Street and W. Genesee Street	PM ₁₀	24-Hour	33.0	42.7	45.5	6.6%	150
	PM _{2.5}	24-Hour	13.5	14.8	15.4	4.5%	35
		Annual	5.6	6.3	6.1	-2.1%	12
Site 3: Almond Street and Harrison Street	PM ₁₀	24-Hour	33.0	82.7	58.6	-29.1%	150
	PM _{2.5}	24-Hour	13.5	16.7	14.6	-12.6%	35
		Annual	5.6	6.6	6.0	-9.3%	12
Site 4: State Street and Erie Boulevard	PM ₁₀	24-Hour	33.0	46.0	46.4	0.8%	150
	PM _{2.5}	24-Hour	13.5	15.5	15.2	-2.2%	35
		Annual	5.6	6.2	6.1	-1.1%	12
Notes:							
PM ₁₀ background concentration was based on 2016-2018 data at the Rochester 2 monitoring station. PM _{2.5} background concentrations for 24-hour and annual PM _{2.5} were based on 2016-2018 data at the East Syracuse monitoring station.							
Concentrations are based on the projected roadway conditions in the 2026 analysis year as a reasonable representative for the estimated time of completion.							

C 9-236: USEPA recommends that the air quality monitoring program be especially vigilant in overburdened Environmental Justice communities and near vulnerable populations such as near schools.

USEPA recommends a comprehensive indoor air quality mitigation plan to address the respiratory health effects related to outdoor pollutants and vehicle exhaust in collaboration with the New York State Department of Health and Department of Education. While speed limits were mentioned for noise abatement, there was no mention of traffic control near schools. Since the school is close in proximity to the project area, we recommend that speed limits and/or stop signs/lights be implemented in the plan to protect the children after the project is completed.

R 9-236: As stated in **Chapter 4 (Table 4-7), Section 6-2-3, and Section 6-4-4** of this FDR/FEIS, an outdoor ambient air quality monitoring program would be implemented during construction of the Project and would be overseen by NYSDOT. The program would consist of real-time

particulate monitoring at a number of locations within the local community, including locations within the environmental justice community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design.

Background particulate monitoring would be conducted as part of the program to establish and routinely verify baseline levels. During construction, real-time particulate matter data would be collected at an established interval (for example, measurements every 10 seconds and logged in 15-minute periods) and time-weighted over 24 hours for comparison to USEPA's National Ambient Air Quality Standards (NAAQS). If the data show that air quality levels are approaching a concern level (to be established during final design) that could result in an exceedance of the 24-hour NAAQS, then operational and/or mechanical deficiencies would be identified and corrected. If the data result in any particulate air quality levels that exceed the 24-hour NAAQS, then the applicable construction activities would be suspended until the deficiencies are identified and corrected.

This FDR/FEIS has been revised to include the above information, including the commitment to locate a monitor outdoors in the vicinity of Dr. King Elementary School.

Regarding traffic control near the school, as described in **Chapter 3** of this FDR/FEIS, based on public input received during the DDR/DEIS public comment period, the FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East in the vicinity of Dr. King Elementary School as part of the Community Grid Alternative. MLK, Jr. East would terminate at the driveway of the Dr. King Elementary School instead of at Renwick Street as it does today; thus, traffic volumes would be lower on MLK, Jr. East as compared to the No Build Alternative and existing conditions. BL 81 would not be signalized at MLK, Jr. East, and there would be no vehicular connection between BL 81 and MLK, Jr. East. Pedestrians and bicyclists also would be unable to cross BL 81 at MLK, Jr. East; instead, they would use a new shared use (bicycle and pedestrian) path along the west side of BL 81 to travel between MLK, Jr. East and Burt Street, where a signalized intersection would allow them to cross east-west.

As stated in **Section 6-2-3**, the Community Grid Alternative would benefit land uses and community cohesion in the Environmental Justice Study Area as compared to the No Build Alternative since the existing I-81 viaduct, a perceived barrier, would be removed from the railway bridge near Renwick Avenue to I-690. The Community Grid Alternative would address deficiencies in the vehicular, pedestrian, and bicycle networks and enhance connectivity. The removal of highway infrastructure and reduction in the transportation footprint, along with related transportation and urban design improvements, would help reconnect neighborhoods on both sides of I-81 and I-690.

C 9-237: USEPA agrees with the creation of a Traffic Management Plan to reduce the health and safety impacts of construction on pedestrian traffic and local travel. USEPA acknowledges that there

are many concerns from the community regarding the health and safety implications of the location of the roundabout near MLK School and so are pleased to learn that NYSDOT is considering alternate locations for this I-81 traffic roundabout.

USEPA also appreciates that improvement of pedestrian and bicycle lanes will be included in the project, as well as noise reduction measures and appreciate the inclusion of Wilson Park in the recommendation to include traffic flow management in the commissioning plan to minimize air pollution from cars moving through the neighborhood.

R 9-237: Comment noted.

C 9-238: According to the Onondaga County Health Department, more than 10 percent of Syracuse children were tested to have elevated levels of lead in 2019 with the area closest to the I-81 viaduct demolition/removal being a “hotspot” where one in six black or brown children are testing with very high blood levels. USEPA therefore recommends NYSDOT in collaboration with the Pediatric Environmental Health Specialty Unit (PEHSU) of Mount Sinai University Hospital, New York State Children Environmental Health Center in Syracuse and the partners of the Green & Healthy Homes Initiative (GHHI) of Greater Syracuse institute a lead monitoring prevention program in children and adults to specifically address the potential exposure to lead in ambient dust that may result from construction. This lead dust would exacerbate the current high blood lead levels that exist in children from black and brown communities. A best practice model from Cincinnati, Ohio was published in 2012 and can be replicated in the Syracuse project. A neighborhood in Cincinnati expressed concern about the planned demolition and replacement of an elevated roadway bridge spanning the neighborhood. Community partners played a key role in developing outreach, lead exposure prevention activities and adherence to lead mitigations methods throughout the duration of the demolition project.

R 9-238: The areas surrounding the existing I-81 and I-690 corridors include residences, Dr. King Elementary School, hospitals/medical facilities, and Wilson Park. Thus, as described in **Chapter 4 (Table 4-7)** of this FDR/FEIS, NYSDOT would require its contractors to implement strict containment and mitigation measures during construction. **Section 6-4-9** of this FDR/FEIS documents the potential to encounter lead-based paint (LBP) under each Project alternative and NYSDOT protocols to handle its removal, transport, and disposal. **Section 6-4-9** has been updated to clarify that all bridges and structures that would be affected by the Project are presumed to have residual LBP. **Section 6-4-9** has also been updated to clarify that lead sampling would be performed during final design and/or during construction activities. All lead sample collection would follow the guidelines set forth under 40 CFR 745.227, which outlines work practice standards as well as the appropriate methods to perform laboratory analysis and evaluate the results of analyzed samples. If lead is determined to be present, sampling, abatement, project monitoring (air monitoring), handling, and disposal would be performed in accordance with local, state, and federal regulations. During sampling and construction, a health and safety plan, including dust monitoring, would be implemented for the protection of onsite personnel. Best management practices would be

implemented, such as materials management procedures, during construction. The removal, packaging for transportation, and disposal of materials with confirmed LBP would be conducted in accordance with federal, state, and local regulations.

Proposed demolition work would be conducted in accordance with the contract documents, or as directed by NYSDOT, and the Contractor would conduct all demolition and removal operations in accordance with the contract documents and local building codes. Prior to construction, the Contractor would be required to prepare and submit a demolition plan to NYSDOT for approval, in accordance with NYSDOT standard specifications. Prior to construction, the Contractor would also be required to prepare and submit a Lead-Exposure Control Plan (LECP) to NYSDOT for approval, in accordance with NYSDOT standard specifications. The LECP would include practices and measures that would be implemented to ensure the safety and health of workers who may be exposed to lead during construction work. By extension, this plan would be developed to protect the general public. Any locations that require open, abrasive blasting of LBP on steel would require Class A containment measures. NYSDOT does not have authority to conduct testing of adults and children as part of the Project.

In response to comments received during the development of the EIS regarding potential public exposure to LBP during construction activities, NYSDOT would implement a LBP public education program prior to the demolition of the existing I-81 viaduct and adjacent structures. NYSDOT would develop the program during final design, in coordination with the Onondaga County Health Department. Potential activities could include the development of educational materials on household protocols to prevent the spread of contaminated dust into homes and holding a community session/meeting focused on demolition and ways to protect residents from lead dust during construction. As described in **Section 4.5.2** of the FDR/FEIS, public outreach during construction would include the establishment of a telephone number for the public to use to ask questions/provide input during construction; implementation of a communication schedule and procedures for providing construction status updates and other construction-related information to the public; and development and maintenance of a website to advise the public on construction activities.

- C 9-239: USEPA appreciates NYSDOT's efforts mentioned in the DEIS to conduct public meetings in spaces accessible by public transit; its efforts to advertise meetings across multiple platforms; and its proposal to provide community outreach materials in additional languages spoken within the community (e.g., Vietnamese).

USEPA recommends that (1) the community be consulted for time availability for public meetings to ensure their input; and (2) the meeting time and number of attendees be recorded to confirm adequate public participation.

- R 9-239: As documented in **Chapter 9** of the DDR/DEIS and FDR/FEIS, numerous opportunities for public input/involvement were provided throughout the development of the EIS for the Project. During the DDR/DEIS public comment period, these opportunities include a virtual public hearing on August 17, 2021 (with sessions at 11 am and 5 pm to accommodate varying work

schedules/public availability); an in-person public hearing on August 18, 2021 (with sessions at 4 pm and 6 pm), as well as an open house from 3 pm to 8 pm; 9 neighborhood meetings in the City and surrounding area; and a virtual “project outreach center” available through the Project website, which provided display boards, presentations, and videos about the Project. **Appendix M-1** of this FDR/FEIS provides a list of the stakeholder and public meetings that were held for the Project and estimated attendance numbers. Meeting times and the number of attendees are included in **Chapter 9** of this FDR/FEIS. **Chapter 9** of this FDR/FEIS also describes the various ways in which the public was notified of meetings and hearings for the Project.

- C 9-240: USEPA recommend public meetings be advertised as far in advance as possible via public forums including social media platforms such as Facebook and Twitter and the project-specific app mentioned in the EIS.
- R 9-240: **Chapter 9** of this FDR/FEIS describes the various ways in which the public was notified of meetings and hearings for the Project. The Contractors will develop a communication/outreach plan for construction that will include advanced notifications, social media platforms, and a project-specific app.
- C 9-241: USEPA thanks NYSDOT for acknowledging and addressing our comment on public housing, i.e., on DEIS page 6-112, “Project-related impacts on environmental justice populations (for example, on the needs of Syracuse Housing Authority’s populations living in close proximity to the highway,” and appreciate NYSDOT’s efforts to hold a meeting with the Syracuse Housing Authority to discuss concerns related to construction impacts to residents near the work zone and other impacts on residents from the change in traffic.
- R 9-241: Comment noted.

9-10 MUNICIPALITY LETTERS AND RESOLUTIONS

- C 9-242: The Onondaga County Legislature-Republican Caucus stated the “proposed solution seriously lacks consideration of all our community’s needs” and that “Onondaga County residents would be sold short if a solution for I-81 is chosen that does not address the needs of our community—urban and suburban. As the relatives of Harriet Tubman recently said, ‘Now is the time to do this correctly.’”
- R 9-242: FHWA and NYSDOT considered whether the construction of one of the various long-span bridge types typically associated with signature bridge structures could potentially be a reasonable concept for the Project warranting further evaluation. It is noted that these types of bridges typically are constructed to address challenging topography, such as waterways serving substantial marine traffic requiring large navigational channels or where the roadway crosses deep valleys. They are rarely, if ever, constructed solely to provide a signature structure when more economical and less impactful options are available; however, in

consideration of the comments received, the agencies conducted a conceptual evaluation of a potential signature bridge.

Alignment and Major Highway Features of Signature Bridge Concept

General Limits and Configuration

It is assumed that a signature structure would be designed to carry a freeway and generally follow the Almond Street corridor along the existing I-81 alignment. This structure would be built in conjunction with street-level improvements of the Community Grid Alternative. The potential signature bridge would connect southern I-81/Business Loop (BL) 81 and I-690 to provide high-speed travel for through traffic, while the Community Grid Alternative would provide local connections for vehicles below the bridge and accommodate bicyclists and pedestrians.

FHWA and NYSDOT considered a signature bridge that would begin approximately just south of Burt Street and end just south of Genesee Street, for a total bridge length of between 3,000 and 3,500 feet. Several bridge types could accommodate this overall bridge length. The north end of the bridge would need to end in the vicinity of Cedar Street to allow enough space for ramp connections between the bridge terminus and I-690. The south end of the bridge would be located approximately where the existing viaduct begins, to facilitate inclusion of an interchange at MLK, Jr. East. This interchange would be required for local street access since an interchange could not be provided from the bridge's main span. Similarly, placing the northern limit in the vicinity of Genesee Street would provide enough separation from I-690 to allow for an interchange with I-690. It is assumed that the bridge would contain a total of either four (two in each direction) or six (three in each direction) lanes plus shoulders.

In addition to the main span of the signature bridge, both the south and north approaches would consist of multi-span bridges to accommodate the numerous necessary ramp and city street crossings. On the south approach, there would be bridges over MLK, Jr. East and the New York, Western, and Susquehanna (NYW&S) Railway bridge. The entire north approach also would need to consist of multi-span bridges.

The signature bridge and approach highways would be designed to meet freeway standards, and both interstate and non-interstate options were considered. Interchange types and configurations would likely vary if the highway carried by the signature bridge was an interstate or non-interstate freeway. As discussed earlier, an interchange would be necessary at MLK, Jr. East. Entrance and exit points between Burt and Cedar Streets to the city street grid would not be feasible from the signature bridge but would be provided by the elements incorporated from the Community Grid Alternative. To replace the functionality of the existing Harrison Street/Adams Street interchange, the existing I-81/I-690 interchange would be reconstructed and reconfigured. The new I-690 interchange at Crouse and Irving Avenues, provided under the Community Grid Alternative, would be included in the signature bridge concept.

Interstate Option

This option would reconstruct I-81 generally along its current elevated alignment through the city. Since this option would maintain I-81 through the city, the conversion of I-481 to I-81

would not be necessary. Any interchanges would need to be full interchanges (an interchange that provides all directions of travel). This option includes many features of the Viaduct Alternative as presented in the DDR/DEIS and FDR/FEIS, except for the following notable differences, which are further described below:

- The interchange at Harrison and Adams Streets would be eliminated;
- A full interchange would be needed on I-81 at MLK, Jr. East; and
- A full interchange would be needed on I-690 at Crouse and Irving Avenues.

Non-interstate Option

This option would replace existing I-81 through the city with an elevated, non-interstate freeway (i.e., Business Loop 81) that generally would follow the current I-81 alignment. Since this option would remove a section of I-81, the conversion of I-481 to I-81 would be necessary. Partial interchanges would be feasible. This option would require:

- A partial interchange on BL 81 at MLK, Jr. East;
- A partial interchange between BL 81 and I-690; and
- A full interchange on I-690 at Crouse and Irving Avenues.

Connections to I-690 and Local Streets

Interstate Option

Between Colvin and Burt Streets, existing I-81 would be reconstructed close to its current location, although the elevation of the freeway would rise as it approaches the signature bridge. It is assumed that the existing bridge over MLK, Jr. East would be replaced and, due to the higher elevation, the section of freeway from just south of the railroad crossing to the start of the signature bridge would be a multi-span bridge structure. Due to the characteristics of a long span signature bridge, it is not possible to provide ramp connections within the limits of the main span, and as a result, an interchange at Adams and Harrison Streets could not be included. Therefore, a full interchange would be required at MLK, Jr. East to provide exits and entrances in both directions for access to local streets. In addition, since the existing interchange at Adams and Harrison Streets would be eliminated, an interchange with I-690 would be required, a new I-690 interchange at Crouse and Irving Avenues would be required, and the I-690 interchange at West Street would be reconfigured. Additionally, a southbound I-81 exit to Clinton Street and a northbound entrance from Pearl Street would be provided, but a new southbound exit to Oswego Boulevard and a northbound Pearl Street extension to Erie Boulevard would not be feasible. To provide connectivity to a full interchange at MLK, Jr. East, a street-level, four-lane "southern boulevard" would be needed between the MLK, Jr. East full interchange and Almond Street at Van Buren Street. It is assumed that the southern boulevard would be similar in configuration to the Community Grid Alternative as presented in the DDR/DEIS and FDR/FEIS and would require replacement of the existing NYW&S railroad bridge. Due to the proximity of the Dr. King Elementary School and the residential area to the west, and of the railroad to the east, the new MLK, Jr. East interchange would be a tight urban diamond interchange where the northbound on-ramp would branch off from the southern boulevard between MLK, Jr. East and the railroad bridge.

As described above, the signature bridge would likely start in the vicinity of Burt Street and end in the vicinity of Cedar Street. Since the signature bridge's alignment would be straight, several buildings along Almond Street would need to be acquired, such as the Syracuse Housing Authority administration building and the Syracuse University steam plant. In addition, numerous, primarily residential buildings would be impacted on the north side of I-690 east of Crouse Avenue due to the new westbound off-ramp, as well as within the I-81/I-690 interchange area. In total, it is estimated that 35 to 40 buildings would need to be removed, including residential, office, institutional, and commercial uses, as well as utility properties. The signature bridge concept would adversely affect multiple historic structures in the adjacent areas, such as Veteran's Fastener Supply Company, the Learbury Centre (which contributes to the North Salina Street Historic District), the former NY Central Railroad Passenger and Freight Station buildings, VIP Structures, Smith Restaurant Supply, Reid Hall, Peck Hall, the Crichton Apartments, Wag Foods, the Howard & Jennings Pump Factory, and the Syracuse Herald building. At the north end of the signature bridge, the horizontal alignment of I-81 would begin to curve at its confluence with I-690 through the interchange area. Additionally, the various ramps would diverge from the mainline. However, the northbound I-81 to eastbound I-690 and the westbound I-690 to southbound I-81 connector ramps would need to merge and diverge within the median of I-690 to meet ramp spacing criteria. All other directional ramp connections would be similar to those included in the Viaduct Alternative.

As a result of eliminating the existing I-81 interchange at Harrison and Adams Streets, a new I-690 interchange at Crouse and Irving Avenues would be required. The Crouse and Irving Avenues interchange configuration would be similar to that in the Community Grid Alternative design, except that the overall footprint of I-690 would be wider between McBride Street and Irving Avenue to accommodate the I-81 connector ramps in the median area and the Crouse and Irving Avenues ramps on the outside. This configuration would likely impact both the former New York Central Railroad Freight Station building on the north side of I-690 and the former Passenger Station building on the south side of I-690, both of which are listed on the National Register of Historic Places (NRHP).

Non-interstate Option

For the non-interstate option, between Colvin and Burt Streets, existing I-81 would be reconstructed close to its current location as a non-interstate freeway. Similar to the interstate option, the elevation of the freeway would rise as it approaches the start of the signature bridge, the bridge over MLK, Jr. East would be replaced, and, due to the higher elevation, the section of freeway from just south of the NYW&S railroad crossing to the start of the signature bridge would be a multi-span bridge structure. Due to the characteristics of a long span signature bridge, it is not possible to provide ramp connections within the limits of the main span, and as a result, an interchange at Adams and Harrison Streets could not be included. Therefore, a partial interchange would be required at MLK, Jr. East to accommodate traffic to and from the south. Due to the proximity of the residential area to the west and the railroad to the east, the new MLK, Jr. East interchange would be a half diamond interchange. Additionally, a partial interchange with I-690 would be required, a new I-690 interchange at Crouse and Irving Avenues would be required, and the I-690 interchange at West Street would

be reconfigured. A southbound BL 81 exit to Clinton Street and a northbound entrance from Pearl Street would also be provided, but the new southbound exit to Oswego Boulevard and the northbound Pearl Street extension to Erie Boulevard, which are included in the Community Grid Alternative, would not be feasible under the signature bridge concept. A street-level, four-lane “southern boulevard” would be needed between the MLK, Jr. East interchange and Almond Street at Van Buren Street. It is assumed that the southern boulevard would be similar in configuration to the Community Grid Alternative in the DDR/DEIS and FDR/FEIS and would require replacement of the existing railroad bridge.

As described above, the signature bridge would likely start in the vicinity of Burt Street and end in the vicinity of Cedar Street. Since the signature bridge’s alignment would be straight, several buildings along the Almond Street corridor would be impacted, such as the Syracuse Housing Authority administration building and the Syracuse University steam plant. In addition, the signature bridge concept would require the acquisition of numerous buildings on the north side of I-690, east of Crouse Avenue (due to the new westbound off-ramp), and within the BL 81/I-690 interchange area. An estimated 35 to 40 buildings would need to be removed, including residential, office, institutional, and commercial uses, as well as utility properties. Furthermore, multiple historic structures in the adjacent areas would be adversely affected. At the north end of the signature bridge, the horizontal alignment of I-81 would begin to curve at its confluence with I-690 through the interchange area. Similar to the interstate option, the various ramps would diverge from the mainline; however, the eastbound I-690 to northbound BL 81 ramp and the southbound BL 81 to westbound I-690 ramp would not be provided. Due to the overall interchange configuration, the building impacts at the interchange would be similar to the impacts under the Viaduct Alternative. Similar to the interstate option, the northbound I-81 to eastbound I-690 and the westbound I-690 to southbound I-81 ramps would need to merge and diverge within the median of I-690 to meet ramp spacing criteria.

As a result of eliminating the existing I-81 interchange at Harrison and Adams Streets, a new interchange on I-690 at Crouse and Irving Avenues would be required. The Crouse and Irving Avenues interchange configuration would be similar to the Community Grid Alternative design, except that the overall footprint of I-690 would be wider between McBride Street and Irving Avenue to accommodate the I-81 connector ramps in the median area and the Crouse and Irving Avenues ramps on the outside. This configuration would likely impact both the New York Central Railroad Freight Station, which is listed on the NRHP, on the north side of I-690 and the Spectrum building on the south side of I-690.

Design Criteria

Under both options, the highway, including the portion carried by the signature bridge, would be subject to freeway design criteria and a 60-mph design speed. Refer to the Design Criteria tables included in **Appendix C-6** of the DDR/DEIS and FDR/FEIS.

1. Signature Bridge Types and Implications

Several structure types are commonly used for providing long-span signature structures. These include cable stayed, suspension, and arch bridges, as discussed below.

Cable Stayed Bridges

Typically, cable stayed bridges are most economical for span lengths ranging from about 700 to over 3,500 feet. This bridge type's name is derived from a design where the superstructure is directly supported by stay cables from towers. Cable stayed bridges typically have three spans—a center (or main) span, which is the longest, and two side (or back) spans flanking the main span. The roadway deck slab is supported on framing with transverse floor beams supporting the deck slab, and edge girders, which run longitudinally along both edges of the bridge superstructure and support the floor beams. The edge girders, in turn, are supported by the stay cables, which transfer the loads carried by the superstructure to the towers, which then carry the loads into the ground. Deep foundations are required to transfer these loads into bedrock. The ends of the cable stayed superstructure are supported by anchor piers, which also support the ends of the approach spans.

The height of the roadway above grade over the length of the cable stayed unit would need to be a minimum of about 50 feet. Approach spans would be needed to transition the roadway from this height to that of the roadway at either end of the bridge. The approach spans typically are constructed of steel or precast concrete girders, with conventional concrete piers, similar to the construction of the existing I-81 viaduct.

Although both concrete and steel have been used for the superstructures of cable stayed bridges, steel is typically more economical. The floor beams and edge girders are typically fabricated as I-sections. To expedite construction, precast concrete panels are typically used for the deck slab, post-tensioned using high-strength steel bars where required to prevent excessive cracking. Multiple wire strands are typically used for the stay cables. The towers are typically constructed as concrete box sections to facilitate installation, as well as the inspection and maintenance of the stay cables and their anchorages. For the foundations, either piles or drilled caissons are typically used.

Given their cost, cable stayed bridges, like other types of long span bridges, are typically constructed where they are most economical; that is, where their length is required to span over obstacles that make substructure construction prohibitively expensive or infeasible. Typically, cable stayed bridges span waterways where there are required horizontal and vertical clearances for marine traffic. Cable stayed, and long span bridges in general, are rarely constructed as viaducts, except where the roadway crosses deep valleys that make pier construction very expensive, such as at the Millau Viaduct in France, where the roadway is more than 1,000 feet above grade, making it the tallest viaduct in the world.

Cable stayed bridge construction begins with the foundations and the towers, after which the main span is typically constructed cantilevering away from the towers in lengths corresponding to the cable stay spacing. The precast deck panels are installed as the superstructure construction progresses. The approach structures are typically constructed concurrently with the cable stayed unit.

For foundation construction, crawler cranes would be required for pile installation or drilled shaft construction. Foundation construction typically proceeds at several locations

simultaneously. Staging areas are required for storing the piles from when they are brought to the site until installation. For drilled shafts, staging is required for storing reinforcement and tying the reinforcement cages that are used to reinforce the shafts. As described below, substantial temporary and permanent impacts could be expected from this construction and the resulting substructure footprint.

With the foundations constructed, pile caps would then be formed and poured to allow loads from the piers/towers to be distributed among the piles/shafts. In the case of a conceptual four-lane, 3,000-foot-long cable stayed bridge in Syracuse, each tower foundation would be approximately 140 feet by 80 feet with 15 nine-foot-diameter drilled shafts.

Cable stayed bridge towers are typically constructed using jump forms, which encircle the column to provide a work platform and can be self-climbing to eliminate the need for cranes to advance the forms up the towers. Cranes are needed to lift the reinforcement cages for installation prior to placing concrete, which is typically pumped from the ground. Tower cranes are also commonly installed as tower construction progresses and are used for the upper portions of the towers.

The anchor piers at either end of the cable stayed unit along with the approach span piers are typically constructed simultaneously with the towers and are of conventional concrete construction. If drilled shafts are used for the foundations, they can be transitioned into the columns of the piers to simplify construction.

Once the towers are completed, construction of the superstructure begins by installing sections of edge girders and then the connecting floor beams followed by the supporting stays. These are typically brought to the site and lifted in large, preassembled sections from barges when spanning a significant waterway, but for construction over land in a dense urban environment, erection would be by the “stick-built” method, requiring thousands of delivery trucks using local streets. With the steel erected, the precast deck panels are then placed, and the crane advanced for the next section of superstructure.

Other Signature Bridge Types

Other long-span, signature bridge types include suspension or arch bridges. Suspension bridges were once the preferred long-span bridge type but have been supplanted for span lengths less than about 3,500 feet by cable stayed bridges, which are more economical and require less time to construct. The cables of suspension bridges require the construction of large concrete anchorages, which must be completed before the cables can be constructed. Cable construction then must be completed prior to the start of superstructure construction. In addition to being more expensive than cable stayed bridges, a suspension bridge would result in greater construction impacts because it would have four massive foundations (two at the anchorages and one at each of the tower piers) and a longer construction duration.

Tied arch bridges are more economical than suspension bridges for the expected main span length (approximately 1,700 feet) and are typically considered for span lengths ranging from about 500 to 800 feet. However, they are less economical than cable stayed bridges, particularly for spans exceeding 800 feet. The increased expense is due to the falsework

required to support the arch ribs during construction and the greater quantity of steel that is needed as compared to a cable stayed bridge. A 1,000-foot-span tied arch would be one of the longest in the western hemisphere.

I-81 Signature Bridge Concept

For discussion purposes, a cable stayed bridge concept was considered for the I-81 signature bridge, given its cost advantages and potential for aesthetic treatments. The bridge would carry the four lanes of I-81 (with the potential to require six lanes) with 5-foot inside shoulders and 12-foot outside shoulders, with a 2-foot median and 1.5-foot barriers, for a minimum total roadway width of 85 feet. Assuming a main span length of about 1,700 feet with 700-foot side spans results in a total length of 3,100 feet for the cable stayed unit. The height of the tower above the roadway would ideally be approximately 325 feet, which, when added to the 50-foot roadway height, yields a total tower height of 375 feet, about 37 stories. As discussed previously, cable stayed, as well as other long span bridge types, are used where there are either obstacles to be crossed or where the cost of substructure units is expensive enough to make them more economical than shorter span structures. For this project, the cost of a “signature” structure would far exceed alternative means to traverse the corridor. A minimum project cost increase of \$800 million could be expected. In addition, these structure types incur higher maintenance costs, as the cables and towers require inspections by specialists, as well as specialized access that results in more disruptive lane closures. Additional costs for security, both physical and electronic, also would be incurred.

In addition to increases in construction duration, the overall project timeline would be increased due to the time required for the bridge’s design. This would be the case whether design-build or design-bid-build was chosen as the project delivery method. A project duration increase of three to five years could be reasonably expected. As is the case for all cable-supported structures, the design would need to include a physical wind tunnel testing program to verify the structure’s aerodynamic stability, including both local climatological studies to determine the effects of the local terrain on wind behavior, as well as the testing of models representing the structure to verify its response to the wind, both during construction and in its final condition. Given the uniqueness of the Project (wind turbulence would be caused by the nearby building structures), it is possible that the bridge would respond differently to wind loads than similar structures over water, which would require making refinements to the design and potentially further increasing the Project’s duration.

The construction of the bridge would pose challenges given its location and proximity to the local community. There would be difficulties in finding the space needed for staging areas near the site to allow for material storage and pre-assembly of bridge components. Travel through the area would be disrupted substantially and additional/larger construction vehicles and equipment (e.g., cranes) would add traffic, noise, and air quality emissions to the communities for the duration of construction due to the large bridge members required for this type of structure. It would not be feasible for the signature bridge alignment to avoid densely developed areas of downtown Syracuse, which include residences, parks, schools, and businesses.

The construction of the Goethals and Mario M. Cuomo Bridges each lasted about three years and a similar or longer construction duration could be expected for a signature structure in Syracuse, given the difficulties discussed above in accessing the site. Additional property acquisition would be required on both sides of the highway to provide adequate room for clearance. The tower foundations could be over 140 feet wide and would likely require the demolition of buildings in their vicinity to provide adequate room for their construction. Additionally, these tower foundations would likely exist in the footprint of the existing corridor, requiring temporarily rerouting traffic for the full duration of construction.

In addition, specific safety concerns are associated with these types of structures. Cable stayed bridges are susceptible to issues resulting from the accumulation of snow and ice on the stays. In Vancouver, British Columbia, this has been an issue for both the Alex Fraser and the Port Mann Bridges, with snow and ice falling on vehicles and even smashing windshields. At the Port Mann Bridge, this issue is exacerbated by the stay geometry, which has the stays crossing over the roadway, resulting in the closing of the roadway just three days after opening to traffic. Methods have been developed to remove the snow from the stays before it can accumulate to the point where it poses a hazard, but they are labor intensive and would be of concern in Syracuse, which receives three to four times the annual snowfall of Vancouver. Given the height of the structure, the falling snow and ice could also pose risks to the surrounding buildings, traffic on side streets, and pedestrians, which are typically not concerns for river crossings. Due to the width and height of a signature bridge, there would be more snow requiring removal and the current method of plowing the snow over the edge of the bridge would need to be replaced with a slower, more expensive process of loading the snow into trucks for disposal to an offsite location.

2. Potential Impacts

Based on its substantial cost and constructability issues, and in consideration of the potential environmental and other impacts described below, the signature bridge concept is considered unreasonable and dismissed from further study.

Both interstate and non-interstate options of the potential signature bridge concept have many of the same benefits as the Community Grid Alternative but differ from the Community Grid in that they also would include construction of the signature bridge. This additional element would result in greater cost and adverse impacts, as described below.

Construction Costs, Constructability, and Maintenance

- The potential cost of this concept does not provide added value commensurate with the increased cost (at least \$800 million to \$1.2 billion more than the cost of the Community Grid Alternative with a cable stayed option, and likely more with other signature bridge types).
- Construction of the signature bridge concept would take at least 8 to 10 years (two more years than the Community Grid Alternative with a cable-stayed bridge and two to four more years with a suspension bridge), resulting in lengthier construction disruption.
- A signature bridge would incur higher maintenance costs than a modern viaduct or street-level roadway. The structure's cables and towers would require inspections by specialists,

as well as specialized access that would result in more disruptive lane closures. Additional costs for security, both physical and electronic, also would be incurred.

- As described above, cable stayed bridges are susceptible to issues resulting from the accumulation of snow and ice on the stays. Methods have been developed to remove the snow from the stays before it can accumulate to the point where it poses a hazard, but these methods are labor intensive, and Syracuse receives high annual snowfall amounts. Also as noted above, given the height of the structure, snow would need to be picked up and removed by truck from the bridge, as conventional snow plowing would pose risks to the surrounding buildings, traffic on side streets, and pedestrians, which are typically not concerns for water crossings.
- Construction of the signature bridge over land in a dense urban environment would be accomplished by the “stick-built” method, requiring thousands of delivery trucks using local streets. Additionally, during construction, the erection of the signature bridge would require extensive closures along the corridor, effectively closing the existing viaduct and Almond Street for a substantial duration. Through traffic would be rerouted to I-481, which would require improvements to accommodate the additional traffic and local access/connectivity also would be disrupted.

Property Acquisitions and Related Economic and Cultural Impacts

- To provide the required design standards and highway connections and accommodate the bridge piers and laydown areas, the signature bridge would result in the acquisition of 35 to 40 commercial, institutional, and residential buildings. Many of these buildings are very large, including the Syracuse Housing Authority office and Syracuse University buildings. Both options also would affect utility properties, including the Syracuse University steam plant.
- The signature bridge concept would adversely affect an estimated 12 historic structures in the adjacent areas, such as Veteran’s Fastener Supply Company, the Learbury Centre (which contributes to the North Salina Street Historic District), the former NY Central Railroad Passenger and Freight Station buildings, VIP Structures, Smith Restaurant Supply, Reid Hall, Peck Hall, the Crichton Apartments, Wag Foods, the Howard & Jennings Pump Factory, and the Syracuse Herald building.

Traffic and Connectivity Impacts and Consequent Air, Noise, and Environmental Justice Effects

- A signature structure spanning a long section of Syracuse over Almond Street would accommodate through traffic, but through traffic comprises only about 12 percent of traffic currently using the existing viaduct. Most of the traffic using the viaduct has destinations within the City. And as noted above, a signature bridge design would eliminate the potential to maintain the Harrison Street/Adams Street interchange, which is the primary point of access to and from the City street grid for many destinations within the City, including University Hill, the largest activity center in Central New York. As described above, without the ability to provide an interchange at Adams and Harrison Street, interchanges would need to be provided at MLK, Jr. East, Crouse and Irving Avenues, West Street, and at I-690.

- The additional interchange at MLK, Jr. East and a four-lane “southern boulevard” would attract more traffic to the area adjacent to the elementary school, as it would become the primary connection to the City street grid for trips to and from the south.
- The full or partial interchange at MLK, Jr. East in combination with the removal of direct access to Harrison and Adams Streets would increase traffic using the local street network to reach University Hill from the south. Consequently, it would increase traffic and related emissions and noise near Dr. King Elementary School and the adjacent residential neighborhood. It is likely that the air quality and noise effects of the signature bridge would be similar to the effects of the Viaduct Alternative. Bridge traffic would be at a higher elevation so some receivers on higher floors could experience greater effects, while those on lower floors could experience lesser effects.
- As documented in the DDR/DEIS and FDR/FEIS, the areas surrounding the existing I-81 viaduct between Van Buren Street and the I-690 interchange include low-income and/or minority (environmental justice) communities. A signature bridge spanning these areas would displace these residents. It would displace businesses with minority and/or low-income employees and that serve low-income and minority populations. It would increase transportation right-of-way through the neighborhoods and encroach on important community facilities, such as Dr. King Elementary School and Wilson Park. It would also increase traffic through minority and low-income communities to serve University Hill and consequently result in greater air and noise impacts. At the same time, the signature bridge would not provide direct benefits to the communities beneath it and would not provide traffic access to the adjacent neighborhoods. The structure would be a dominant visual feature and barrier throughout the area.

Other Environmental Impacts

- Existing I-81 has been recognized by local plans as a barrier between neighborhoods. The signature bridge concept would construct a new, wider, taller, and more substantial barrier between neighborhoods. While the Community Grid portion of the signature bridge concept would provide east-west access between neighborhoods for vehicles, bicycles, and pedestrians, the signature bridge would negatively affect community cohesion and its abutments would impact bicycle path continuity and connectivity. A signature bridge would not correct existing I-81’s detrimental effects on community cohesion and neighborhood character.
- Compared to the existing I-81 viaduct, the wider signature bridge structure would have more encroachment on Wilson Park and would be closer to Forman Park.
- The signature bridge’s greater width and height would substantially change the visual character of the area for multiple user groups. Its towers would be among the tallest structures in Syracuse and would be visible from many parts of the city. The bridge itself would also be taller than many adjacent structures and would be even more of a prominent feature of the skyline than the I-81 and I-690 viaducts are today. Many areas near the signature bridge, including Pioneer Homes and other adjacent properties, would experience increased shadowing throughout periods of the day and could be in full shadow during winter months.
- Since the signature bridge would be in an urban setting, and its design would include features to manage stormwater flows, it would not result in effects to natural resources that would differ from those predicted for the Viaduct and Community Grid Alternatives.

C 9-243: The Town of Clay submitted letters and resolutions on behalf of numerous municipalities that opposed the grid-only option. The submissions included letters from Town Supervisors and Mayors of Onondaga and Cayuga Counties, and 31 Resolutions—one each from the Onondaga and Cayuga county legislatures and from 29 municipal entities within the two Counties: the Village of Aurora, City of Auburn, Town of Camillus, Town of Cicero, Town of Clay, Town of DeWitt, Village of Fleming, Town of Geddes, Town of Ira, Town of LaFayette, Town of Lysander, Town of Manlius, Town of Marcellus, Town of Minoa, Town of Moravia, Town of Onondaga, Town of Otisco, Town of Owasco, Town of Pompey, Town of Salina, Town of Sennett, Town of Skaneateles, Village of Skaneateles, Town of Spafford, Town of Tully, and Town of Van Buren.

The Town Supervisors and Mayors of Onondaga and Cayuga Counties' letters, which had been addressed to Transportation Secretary Pete Buttigieg earlier in 2021, expressed support for a "new consolidated rebuilding program for the future of I-81," possibly including an "iconic bridge" in addition to the community grid option. The officials wrote that the cars and trucks diverted onto local streets with the grid-only solution would increase greenhouse gas emissions, fuel consumption, and accidents; emphasized that many of those who commute using I-81 are suburban and rural residents who depend on an efficient route to maintain their livelihoods; and outlined how devastating the grid-only option would be for the local economy.

The 31 Town Resolutions dated from between 2013 to 2018, prior to the completion of the DDR/DEIS, had been previously submitted as comments during the scoping and preliminary DEIS comment periods. The Town of Van Buren also resubmitted its resolution in October 2021. The resolutions advocated for a balanced, comprehensive, and regional transportation plan that would provide environmental, social, and economic benefits to all of Central New York and voiced support for maintaining I-81's current alignment, function, and Interstate designation through Syracuse.

The Town Resolutions called out their general opposition to the following:

- Removing the region's "vital backbone," which provides vital and convenient access for residents, workers, and visitors travelling to Downtown Syracuse and its medical, academic, entertainment, shopping, and other key destinations.
- Changing the Interstate function and designation, the undoing of which would irreparably cripple the regional economy that has grown up around the highway network and result in higher costs to taxpayers.
- Turning Interstate 81 to Route 481, which would leave no alternative north-south route for national defense, national disaster, and general maintenance and repairs.
- Increased drive times for residents, workers, and visitors, and added truck traffic to local streets, both of which would produce more greenhouse gases, burn more fuel, result in more accidents, and decrease residents' quality of life.
- As a result of additional gridlock, increasing noise, dust, toxic emissions, and atmospheric pollution on land and water, businesses, homes, and schools.

R 9-243: NYSDOT considered the social, economic, and environmental effects of the Community Grid Alternative, which are presented in the DDR/DEIS and FDR/FEIS, and considered all input

received regarding advantages and disadvantages of the Community Grid Alternative. Based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the project alternatives; public and agency input; and national, State, and local environmental protection goals, the Community Grid Alternative has been identified as the Project's Preferred Alternative (see **Section 8.3** of the DDR/DEIS and FDR/FEIS). The DDR/DEIS and FDR/FEIS include analyses of the full range of potential social, economic, and environmental effects of the Project. Where adverse effects are identified, the DDR/DEIS and FDR/FEIS describe measures to mitigate these effects (see **Chapter 6, Social, Economic, and Environmental Considerations**). The DDR/DEIS and FDR/FEIS also include analysis of the effects of the Project on environmental justice populations and concludes that the Community Grid Alternative would not result in disproportionately high and adverse effects to environmental justice populations (see **Section 6-2-3**).

While I-481 would become the new I-81, BL 81 would still remain a viable route for national defense, national disasters, and other major incidents. NYSDOT has also considered the potential for changes in traffic within Central New York using the I-81 Project Travel Demand Model, and the potential effects of the Community Grid Alternative on traffic are disclosed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS. Potential effects on regional and local economies are discussed in **Section 6-3-2** of the DDR/DEIS and FDR/FEIS. Also, see responses to comments in Section 6 of this appendix regarding traffic considerations. NYSDOT would own and be responsible for maintenance of BL 81, while local streets would continue to be maintained by the City of Syracuse, as they are today. NYSDOT will continue collaborating with the City of Syracuse regarding ownership and maintenance of local streets in the Project Area.

- C 9-244: The Town of Salina submitted a revised Town Resolution dated October 2021 that contrasted the Town's economy at the present day to what it might look like if the grid-only option were to be built and interstate traffic diverted from the Town. The main points include that it would endanger the Town's high Moody's Investors Service rating; significantly lower the revenue (by approximately 30 percent) of Town restaurants, hotels, and gas stations, and engender a commensurate loss of sales tax revenue, thereby causing decreases in property values, job loss, and a drop in population.
- R 9-244: The analysis in **Section 6-3-2** of the DDR/DEIS and FDR/FEIS does not support the potential losses in revenue expressed in the Town Resolution. The Community Grid alternative would not result in reductions in traffic volumes, travel times, or through-traffic consumer base that could lead to a 30 percent loss in revenue for businesses, or the loss in tax revenue, assessed values, property taxes, or jobs indicated in the Town Resolution. The analysis considers the potential loss consumer base due to increased travel times and changes in travel patterns, including reductions in through-traffic consumer base, and finds that with the exception of the Pilot Travel Center, the potential loss in through-traffic consumers would not be large enough to jeopardize the viability of businesses.

9-11 TOWN OF SALINA, SUPERVISOR

C 9-245: NYSDOT has failed, through SEQRA and the DEIS, to adequately identify and consider the negative impacts to the Town of Salina and offer any mitigation measures to rectify these impacts.

R 9-245: The DDR/DEIS and FDR/FEIS's comprehensive analysis of potential impacts within the Project Area, including the Town of Salina, did not identify adverse impacts that would need to be mitigated.

C 9-246: The DEIS should look at the potential economic damage the Community Grid Option may do by forcing traffic around the eastern side of Onondaga County and by-passing the Town of Salina, which has become a natural "stopping off point" for traffic, and where businesses and commercial areas have located based on the existing configuration of I-81. To take this away without any consideration of its impact is contrary to the environmental review process required under SEQRA.

The GAR Associates' report identifies the economic impact the Community Grid Option will have as stemming from potential business failures due to re-routed traffic, which will result in empty stores, which will result in vacant parcels. Vacant parcels become an environmental blight in a community and reduce property values, which in turn result in less tax revenue to the Town of Salina. Less tax revenue impacts the ability of the Town government to provide the vital services that the residents expect and deserve.

R 9-246: Comment noted. Please see responses to **Comments 9-247** and **9-248**.

C 9-247: It is vitally important to the residents of the Town of Salina that their views about the impacts of the Community Grid Option are heard, considered, and acted upon.

R 9-247: Comment noted.

C 9-248: The Limited Scope, Preliminary Review Prospective Impact On Market Value Report performed by GAR Associates, LLC, (the GAR Report) concluded that the Town of Salina would suffer an economic loss as a result of the I-81 Viaduct Project, with different property types within the Town suffering varying level of effects. These impacts, combined with an already slightly decreasing population, may imply long-term negative effects as a result of this project. Below are the anticipated impacts for major property:

LODGING: Hotel and motel properties would suffer a moderate negative impact (5 percent to 15 percent value decline), primarily due to loss of through traffic on north/south travel through the City of Syracuse. The main impact area would be for the hotels along the 7th North Street Corridor as they rely on this north/south traffic. Hotels around the I-90 exits would see less of an impact due as there will be no pattern changes for their main clientele.

RESTAURANT: Restaurants would also suffer a moderate negative impact (5 percent to 15 percent value decline) from two primary sources. Loss of pass-through traffic would eliminate

the person stopping off the interstate for a quick bite before continuing their travels, but also a loss in lodging would impact restaurant traffic. The impact is expected for this property group, particularly in the 7th North Street Corridor.

RETAIL: Retail would see a minimal negative impact (1 percent to 5 percent) as the loss of pass-through traffic does not affect their main customer base, locals. There would be some loss in and around the loss of hotel customers.

OFFICE: Office would suffer a minimal negative impact (1 percent to 5 percent). The primary source of concern would be expected increased commute times for those travelling from the City of Syracuse where the Community Grid portion of the I-81 Viaduct Project would slow traffic.

APARTMENTS: Apartments would suffer a minimal negative impact (1 percent to 5 percent) as there is ample employment centers in the region, both in the Town of Salina and immediately adjacent. There would still be adequate interstate and Downtown Syracuse access from the area as well as other amenities, such as retail centers and restaurants.

WAREHOUSE/INDUSTRIAL: Warehouse and industrial properties would see a moderate negative impact (5 percent to 15 percent), primarily due to increased travel times on north/south routes. This impact is mitigated by the substantial I-90 access within the Town and the significant industrial development in the Town of Clay, which would attract other industrial development to the area. Although there are some industrial properties in its immediate vicinity, the Pilot Travel Center, which caters to high volume truck traffic, east I-81 on the 7th North Street corridor, would be one of the most negatively affected properties with much of the pass-through trucking traffic being routed east, along exiting I-481.

Impact on Town of Salina Assessed Values

Within each of the defined property types, the GAR report predicts, each individual property will see a different effect of the proposed I-81 project. Several influencing factors including age, quality, condition, etc., would impact the value of each property. Based on information provided by the Town of Salina Assessor's Office, the aggregate assessed value for the 2021 roll year is detailed by property types: Restaurant - \$23,141,500; Mixed-Use - \$23,948,200; Lodging - \$46,503,900; Retail - \$46,602,400; Industrial - \$123,867,000; Office - \$130,345,680; and Apartments - \$156,449,000. It would be assumed that there would be an impact on these aggregate numbers, within the property types as detailed above. The exact aggregate decrease in assessed value is unknown, as the higher value properties within each property type would have more impact than the lower valued properties.

- R 9-248: The commenter raises factors that were considered in **Section 6-3-2** in determining the potential economic effects of project alternatives at the local and regional level, including the potential economic effects of increased travel times, changes in highway access, and changes in consumer travel pattern. While some properties within these property types may experience a decline in value due to lost consumer trips, as noted by the commenter, each individual property would see a different effect depending on several factors. The analytic assumptions that formed the estimated declines in value cited by the commenter are not described, so it is

difficult to respond specifically to these estimates, other than to note that the analysis in **Section 6-3-2** suggests that the estimated declines are overstated. As summarized in **Section 6-3-2** and as detailed in **Chapter 5, Transportation and Engineering Considerations**, during the AM peak hour, increases in travel time would range from 0 to 5 minutes, and during the PM peak hour, increases in travel time range from 0 to 6 minutes. Peak-hour travel time increases to and from Liverpool were 0 to 1 minute, with the exception of LaFayette, where travel times are projected to increase by 4 minutes. Outside of the peak hours, the changes in travel times would be the same as or less than in the peak hours. These changes in travel time would not substantively alter consumer travel patterns for travelers destined to Salina. The analysis in **Section 6-3-2** considers the potential loss in through-traffic consumer base and finds that with the exception of the Pilot Travel Center, the potential loss in through-traffic consumers would not be large enough to jeopardize the viability of businesses.

9-12 TOWN OF SALINA, 4TH WARD COUNCILOR

- C 9-249: The data used to create DEIS Appendix D-2, "Economic Considerations," contained numerous pitfalls and shortcomings. Out of Date Information. The DEIS released on July 16, 2021 does not contain data to provide the most accurate timely analysis possible. Labor Force Data were obtained from the U.S. Census 2000. The Existing Employment and Labor Conditions reads, "the metropolitan area lost 10,161 residents or 1.5 percent of its population from 2010 to 2019." That is false. The U.S. Census 2020 data shows a growth of 2 percent in Onondaga County. Current and forecasted employment conditions are out of date and irrelevant. Examples include Amazon opening two new facilities in Onondaga County, a 3.8 million sf Distribution Center on Morgan Road in Clay, and a 112,000-sf facility on Kirkville Road in DeWitt, which, in addition to generating major job growth, will obviously also generate major growth in highway now.
- R 9-249: The analyses in **Section 6-3-2** utilized the most current data available at the time the analyses were prepared. Historic labor force data from the U.S. Census 2000 were presented in order to provide trend information since 2000; the analysis compares the 2000 labor force estimate to the most current Census labor force estimate, which is from the Census 2015-2019 American Community Survey (the 2020 Census does not provide labor force estimates). With respect to the quoted DDR/DEIS statement about residential population, the statement was based on 2010 and 2019 Census estimates for the Syracuse Metropolitan Area, not Onondaga County. Since publication of the DDR/DEIS, 2020 Census data has become available, which shows that the metropolitan area's estimated population decrease since 2010 is only 0.1 percent. Specific reference to, and consideration of, the planned Amazon distribution center and other planned development projects would not alter the findings of the economic analysis. **Section 6-3-2** considers the potential for induced economic growth and the potential for indirect business displacement as a result of the project alternatives, including the potential economic effects on freight (truck) traffic. As detailed in **Section 6-3-2**, the projected changes in travel patterns with the Community Grid Alternative are not expected to adversely affect local or regional economic conditions.

C 9-250: Contradictory Data. Multiple sources will develop different estimations even though the estimates are for the same market, and projections can differ on how conservative or liberal the estimators are in their interpretation of the raw data. The section addressing Potential Indirect Business Displacement reads, “there is not a substantial difference in average travel time between the No Build, Community Grid, and Viaduct Alternatives.” That is false. Outside of peak hours traveling northbound I-81 arriving at 7th North Street (Exit 25) the average drive time is six minutes from the existing northern I-481 interchange (Interchange 29). Outside of peak hours traveling northbound I-481 arriving at 7th North Street (Exit 25) from the existing northern I-481 Interchange (Interchange 29) the average drive time is 20 minutes. During the AM and PM peak hours the travel times will significantly increase. The travel times will not decrease by simply widening the highway from four to six lanes around the eastern side of Syracuse. The substantial increase in travel time is a result of the substantial increase in driving distance attributed to the removal and lack of roadways, interstate interchanges, and traffic patterns disrupting the safe and free flow of vehicular traffic.

The DEIS also states that “the projected 1.3 percent decrease in consumer trips represents a very small portion of total (hotel) bookings...suggesting that a slight decrease in bookings would not jeopardize their (hotels) viability.” In a *Spectrum News* article dated August 17, 2021, Mark Frechette, the director of the I-81 Project for NYSDOT, is quoted saying, “our analysis showed that the percentages were far less impactful to the hotels.” This is also false. The 2019 AADT is estimated at 74,430 vehicles. Currently one hotel will typically sell 30 rooms to same day travelers. Multiply 30 rooms by 11 hotels and there is a decrease of 330 rooms sold a day to same day travelers due to traffic being rerouted to I-481. In this case, NYSDOT has made no effort to ascertain the facts. They have made no direct outreach to the affected shareholders.

R 9-250: With the Community Grid Alternative, individuals destined for 7th North Street would be able to use BL 81 just as they currently use I-81. As detailed in **Chapter 5, Transportation and Engineering Considerations**, during the AM peak hour, increases in travel time would range from 0 to five minutes, and during the PM peak hour, increases in travel time range from 0 to 6 minutes. Outside of the peak hours, the changes in travel times would be the same as or less than in the peak hours.

The suggested decrease of 330 rooms due to traffic being rerouted to I-481 makes the following incorrect assumptions:

- All of the 30 same-day bookings were through-trip travelers who did not have a Syracuse-area destination in mind when booking. Individuals who have a Syracuse destination in mind when booking would not be deterred from booking at a 7th North Street Hotel, because the changes in travel times to the hotel would not be large enough to deter bookings.
- All of the 30 same-day bookings are from travelers originating north or south of the I-481 junctions. Based on Streetlight data, approximately one-quarter of trips ending at the 7th North Street hotels originate from these points.

- All hotels have a similar composition of guests. The commenter utilizes data from one hotel to extrapolate across 11 hotels. Survey responses from the subject hotels suggest great variation in the types of guest visits, lengths of stay, trip purpose (i.e., business vs leisure), and rates of walk-in and same-day bookings.

Regarding direct outreach to the affected stakeholders, the analysis in **Section 6-3-2** and **Appendix D-2** of the DDR/DEIS cited above was provided in response to public comments, including comments from hotel owners. Based on the concerns cited by commenters, NYSDOT developed a methodology for the analysis of potential effects on hotels that relied on publicly available data, supplemented by years 2013-2019 hotel trend data for the Liverpool, NY area purchased from STR, Inc., and StreetLight data specific to the hotels at Interchanges 23 through 25. StreetLight Data is an on-demand mobility analytics platform that takes and analyzes vehicle movements using data from mobile devices, connected cars and trucks, as well as census data, road network information and more. This data was used to determine the number of trips during different periods of time and by routes to destination. The data includes all vehicles to/from a destination, including the destination's employees and visitors.

Through the public review process for the DDR/DEIS, NYSDOT and FHWA welcomed review and comments from interested parties, who can provide additional information beyond that found in the DDR/DEIS analysis; NYSDOT considered all comments in developing the FDR/FEIS and issuing findings. It should also be noted that the STR hotel and StreetLight data were supplemented in this FDR/FEIS with data from local hotels, including several located at or near I-81 Interchanges 23 and 25. A meeting with 12 hotel representatives was held at their request on September 13, 2021. Following the September 13th meeting, some hotel representatives submitted information, including employment estimates, hotel amenities, guest composition and origins, advance bookings vs. walk-in reservations, length of stay, and brand loyalty membership. The responses included confidential performance data and therefore is not included in the appendix to this FDR/FEIS.

- C 9-251: Lack of Applicability. According to the DEIS, Local Study Area Data were gathered and analyzed to assess locations to an overall metro and study areas were established to focus on potential induced growth. However, these study areas were totally inadequate; they do not cover suburban areas and areas negatively impacted by the Community Grid option. Economic considerations in the DEIS are based on false information. NYSDOT is on record erroneously stating that "the traffic volumes aren't dropping that much in those areas." In addition, its study shows only a 1 percent decrease in business along the 7th North Street corridor.
- R 9-251: As described in **Section 6-1, Introduction**, the following four study areas were identified for the Project: Central Study Area, I-481 South Study Area, I-481 East Study Area, and I-481 North Study Area (see **Figure 6-1-1**). In addition, the assessment of economic effects includes three regional study areas: the City of Syracuse, Onondaga County, and the 5-County Region (Onondaga County, Oswego County, Cayuga County, Cortland County, and Madison County), and in response to public comments, expanded economic study areas were

considered for the Community Grid Alternative, which include key destinations and locations, adjacent to or near the above study areas, that could experience increases or decreases in consumer base due to changes in travel time and traffic volumes under that alternative. Annual average daily traffic (AADT); Institute of Traffic Engineers (ITE) Trip Generation Handbook, 2nd Edition; SMTC Regional Travel Demand Model; and StreetLight data were used to understand existing travel patterns and project the anticipated changes in travel times and traffic volumes within the expanded study areas. The analysis considered properties along roadways, interstate interchanges, and specific business districts where changes in traffic patterns could alter market conditions by increasing or decreasing access and potential consumer base (see **Figure 6-3-2-1**).

- C 9-252: There are serious concerns and questions regarding the data sources and information obtained by NYS DOT for the Draft Environmental Impact Statement that bears on the decision at hand. Data sources requires the use of both primary and secondary data. Primary data is data gathered specifically for the task at hand. It is the data obtained from a site inspection. It is evident that the NYS DOT did not gather primary data by direct observation or by explicit questioning of people and businesses that represent the areas impacted. The Economic Considerations in Appendix D-2 of the Draft Environmental Impact Statement must be re-evaluated and updated to include, among other things, 2020 U.S. Census Data. The entire Draft Environmental Impact Statement must be completely redone. Onondaga County and New York State deserve better from the New York State Department of Transportation and the elected officials that swore an oath to represent the interests of the people they represent. A new study must be commissioned, and oversight provided by qualified, skilled individuals. It is critical accurate data is obtained for the task at hand through primary data sources. Simply reviewing massive amounts of online data and printed government reports is not sufficient to develop, and accurately interpret, the meaningful data essential to make an informed decision.
- R 9-252: The analyses in **Section 6-3-2** utilizes data sources and methodologies appropriate for environmental analyses under NEPA and SEQRA, including both primary and secondary data sources, and the analysis in the DDR/DEIS utilized the most current data available at the time the analyses were prepared. See response to **Comment 9-249** for additional discussion. Additionally, the 2020 Census data shows that the metropolitan area's estimated population decrease since 2010 is only 0.1 percent. The Project website also provides Project information materials and visual aids, such as a video and renderings of the Community Grid Alternative and the presentations (with sign language and Spanish-language interpretation) from the Project public hearings. During the DDR/DEIS public comment period, a "virtual project information room" was available on the Project website, which provided display boards, presentations, and videos about the Project. NYSDOT will continue to utilize visual aids throughout the course of the Project.

9-13 NEW YORK CIVIL LIBERTIES UNION (NYCLU)

- C 9-253: The NYCLU supports, in part, the NYSDOT's preferred option of the community grid, and in particular, the permanent removal of the 1.4-mile raised viaduct and supports its replacement with a walkable user-friendly street-grid option. The removal of the viaduct is the first step in restoring a community that the original construction of Interstate 81 ("I-81") destroyed. However, we do not support the 2021 DEIS's conclusion that the environmental justice community—primarily Black neighborhoods adjacent to the viaduct—will not be impacted by the I-81 Project. This conclusion is unsupported and the result of NYSDOT's failure to adequately examine the impact of the Project on lead exposure, air quality, and the potential displacement on the largely Black residents adjacent to the I-81 Project. As set forth in the NYCLU report, *Building a Better Future: The Structural Racism Built in I-81, and How to Tear it Down* ("Building a Better Future Report"). NYSDOT must take steps to protect the health and livelihoods of these residents.
- R 9-253: Comment notes. See responses to Comments **9-254** through **9-290**.
- C 9-254: The DEIS fails to address, under NEPA, the elevated levels of lead and their direct, indirect, and cumulative impacts on the Black community adjacent to the I-81 viaduct. NYSDOT must present a "detailed statement by the responsible official" that enables the public to "weigh a project's benefits against its environmental costs." Instead of analyzing lead on the 1.4-mile raised viaduct, the 2021 DEIS makes a perfunctory statement that painted structures constructed prior to 1988 "are considered hazardous." But this statement fails to account for lead embedded in the highway in addition to the lead paint, such as lead deposited from decades of leaded-gasoline use. The complete absence of data on lead levels prevents the public from being able to make a "reasoned decision" regarding the potential impacts of lead from the Project and thus fails to provide the type of detailed statement by a responsible official required by law.
- R 9-254: The Project will be designed to minimize and reduce all environmental effects to the extent practicable. The NYSDOT has always taken a conservative stance and assumed all painted structural components are lead containing unless lead abatement has been performed and is documented. As a result, the work practices that are followed are stringent to afford the maximum protection to the public and the environment and detailed testing of every bridge structure is not required. FHWA and NYSDOT developed a robust set of construction mitigation measures and best practices for the Project (see **Table 4-7** of this FDR/FEIS). These measures include a requirement that the Contractor prepare a Lead Exposure Plan that includes practices and measures that would be implemented to ensure the safety and health of employees who may be exposed to lead during construction. By extension, this plan would be developed to protect the general public. **Section 6-4-9** of the DDR/DEIS and FDR/FEIS documents the potential to encounter lead-based paint under each project alternative and NYSDOT protocols to handle its removal, transport, and disposal. The Contractor will be required to follow NYSDOT Specifications Section 107-05 with regards to Safety and Health Requirements; Section 107-10 for managing surplus Material and Waste;

Section 107-11 with regards to Air Quality Protection; and Sections 570 and 571 for paint removal operations and disposal as applicable. Addressing possible atmospheric deposits in undisturbed soils or lead blood levels in children is beyond the scope of this Project. Disturbed soil resulting from the conversion of Almond Street to Business Loop 81 will be excavated and disposed of in accordance with NYSDOT specifications. During construction, the Contractor shall conduct exposure monitoring. Exposure monitoring samples shall be obtained by the Industrial Hygienist (IH), a competent person under the direction of the IH, or other qualified persons as specified in the Lead Exposure Control Plan. Exposure monitoring samples shall be analyzed by a laboratory selected by the Contractor, using a method which meets the accuracy requirements of 29 CFR Subpart D. The Contractor shall provide the Engineer a summary of exposure monitoring sample test results which were completed in the past month prior to payment. NYSDOT does not have authority to conduct testing of adults and children as part of the Project.

- C 9-255: The DEIS concluded that there will be no adverse cumulative effects related to air quality because either the viaduct or community grid alternative will not exceed the National Ambient Air Quality Standards (“NAAQS”) limits. But this conclusion is without any support in actual data. Without proper tests of the air quality within the footprint of the environmental justice community, the NYSDOT simply has no basis to arrive at this conclusion, and in any event, that is not the standard the NYSDOT must meet when proposing a project in an environmental justice community. Rather, the NYSDOT must determine if there will be a disproportionate impact on the environmental justice community, when compared to non-environmental justice communities. See E.O. 12898.

The NYSDOT responded to public concerns regarding air quality in the vicinity of I-81, and performed additional testing. However, the NYSDOT placed air monitors outside the environmental justice area, specifically at the cross section of Burt Avenue and Almond Street, arguably the closest residential community to the viaduct. The NYSDOT used the median average of those air monitoring test to draw the conclusion that the community will not be adversely impacted by increased air pollution. 2021 DEIS Section 6-4-4, at 6-249. Moreover, the NYSDOT failed to adequately consider the cumulative impacts of the I-81 project on air quality as this community is already overburdened with air pollution. 40 C.F.R. § 1508.7 (repealed 2020). In the footprint of the Project there is the Midland Avenue Regional (sewage) Treatment Facility and the Syracuse University Steam Plant. Shockingly, the NYSDOT failed to consider or address any of the existing air pollutants. In *City of Carmel v. U.S. Dept. of Transportation*, the Court of Appeals for the Ninth Circuit explained that an EIS must “catalogue adequately the relevant past projects in the area” and include a “useful analysis of the cumulative impacts of past, present, and future projects.” 123 F.3d 1142, 1160 (9th Cir. 1997). The 2021 DEIS does not do this and thus cannot adequately take a hard look at the cumulative effects of the I-81 Project on air quality.

Furthermore, as explained in the Building a Better Future Report, the Black communities in the footprint of the Project have elevated Asthma rates as compared to non-minority population in Syracuse. Building a Better Future Report 12. Again, the NYSDOT air quality

test fails meet the standards set by Title VI and E.O. 12898 by failing to ensure federal dollars will not be used in a way that will disproportionately overburden the environmental justice community with higher rates of air pollution than non-minority populations in the footprint of the project.

The 2021 DEIS's cursory NAAQS review does not consider if there is a disproportionate impact on air quality for an environmental justice community, which is highly likely given the pollution burdens already present in the neighborhood. See Building a Better Future Report²². The Court of Appeals for the Fourth Circuit's decision in *Friends of Buckingham v. State Air Pollution Control Board*, is instructive on the limits of reliance on the NAAQS. 947 F.3d 68, 88 (4th Cir. 2020). There, the court determined that the State Air Pollution Control Board of Virginia failed to ensure that the developers did not impose a disproportionate impact on the predominantly African American community because they simply relied upon the fact that the air quality surrounding the proposed project will fall within the NAAQS limits. *Id.* At 86. The court held that simply staying within the confines of the NAAQS does not mean that a disproportionate impact on minority or disadvantaged communities did not take place. *Id.* At 93.

The 2021 DEIS further contends that each of the alternatives, including the community grid, would be below the NAAQS limits. But this assertion is insufficient in two ways. First, the NAAQS is limited to reviewing 24-hour and annual average exposures, and thus misses the maximum exposure time periods that can have significant health impacts, specifically for school-aged children. Review of the National Ambient Air Quality Standards for Particulate Matter, 85 Fed. Reg. 82684 (Dec. 18, 2020). Periods of maximum exposure should not be ignored here because STEAM at Dr. King Elementary School and Toomey Abbott Towers, a senior residential building, are adjacent to where construction equipment, omitting harmful pollution into the air. 2021 DEIS Section 4(f) Evaluation 3-33. The NYSDOT must take a hard look at the air pollution exposure during prime traffic times in connection with school travel schedules, outdoor play time, and heavy travel times.

- R 9-255: As stated in **Chapter 4 (Table 4-7)**, **Section 6-2-3**, and **Section 6-4-4** of this FDR/FEIS, an outdoor ambient air quality monitoring program would be implemented during construction of the Project and would be overseen by NYSDOT. The program would consist of real-time particulate monitoring at a number of locations within the local community, including locations within the environmental justice community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design.

Background particulate monitoring would be conducted as part of the program to establish and routinely verify baseline levels. During construction, real-time particulate matter data would be collected at an established interval (for example, measurements every 10 seconds and logged in 15-minute periods) and time-weighted over 24 hours for comparison to the USEPA's National Ambient Air Quality Standards (NAAQS). These standards are designed

to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly, with an adequate margin of safety. If the data show that air quality levels are approaching a concern level (to be established during final design) that could result in an exceedance of the 24-hour NAAQS, then operational and/or mechanical deficiencies would be identified and corrected. If the data result in any particulate air quality levels that exceed the 24-hour NAAQS, then the applicable construction activities would be suspended until the deficiencies are identified and corrected.

This FDR/FEIS has been revised to include the above information, including the commitment to locate a monitor outdoors in the vicinity of Dr. King Elementary School.

As documented in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, the air quality analyses for the Project were conducted in accordance with the established procedures in NYSDOT's The Environmental Manual, USEPA's guidance on project-level air quality analyses, and FHWA's current guidance on mobile source air toxic analysis, and utilized air quality modeling. Air quality monitoring was not conducted. Both construction-related and operational-related (i.e., after construction) air quality effects were assessed.

The analyses for construction activity included a particulate matter (PM_{2.5} and PM₁₀) microscale analysis. As documented in **Sections 6-2-3** and **6-4-4** of this FDR/FEIS, the Martin Luther King, Jr. East area, which is within an environmental justice community, was selected as the representative location for analysis. **Section 6-4-4** of this FDR/FEIS present the results of the analysis. As shown, the particulate matter concentrations would be below the NAAQS.

The analyses of operational effects also included a particulate matter (PM_{2.5} and PM₁₀) microscale analysis. As documented in **Sections 6-2-3** and **6-4-4** of this FDR/FEIS, the following four sites were selected for analysis for the Community Grid Alternative: Crouse Avenue and Burnet Avenue to Crouse Avenue and Erie Boulevard; North West Street and West Genesee Street; Almond Street and Harrison Street; and State Street and Erie Boulevard. Each of these four sites is located within an environmental justice community. These sites were selected based on projected traffic conditions, the introduction of new/modified roadways, and the proximity to sensitive receptors. **Section 6-4-4** and **Appendix G** of this FDR/FEIS present the results of the analysis. As shown, the particulate matter concentrations at the analysis sites would be below the NAAQS. Thus, adverse effects related to particulate matter concentrations are not anticipated.

As documented in **Section 6-4-4**, for the analysis of operational effects, the particulate matter concentrations at each of the analysis locations under the build alternatives were also compared to the No Build Alternative. The results for the analysis of the Community Grid Alternative are documented in **Section 6-4-4** and also copied below. As shown, the concentrations would be lower at some of the analysis sites and higher at some of the analysis sites as compared to the No Build Alternative.

PM_{2.5} and PM₁₀ Maximum Concentrations at Analysis Sites (µg/m³)

Analysis Site	Pollutant	Averaging Period	Background Concentration	No Build Alternative Total Concentration	Community Grid Alternative Total Concentration	Percent Change	NAAQS
Site 1: Crouse Avenue and Burnet Avenue to Crouse Avenue and Erie Boulevard	PM ₁₀	24-Hour	33.0	43.0	44.7	3.9%	150
	PM _{2.5}	24-Hour	13.5	14.5	15.3	5.1%	35
		Annual	5.6	5.9	6.2	4.5%	12
Site 2: N. West Street and W. Genesee Street	PM ₁₀	24-Hour	33.0	42.7	45.5	6.6%	150
	PM _{2.5}	24-Hour	13.5	14.8	15.4	4.5%	35
		Annual	5.6	6.3	6.1	-2.1%	12
Site 3: Almond Street and Harrison Street	PM ₁₀	24-Hour	33.0	82.7	58.6	-29.1%	150
	PM _{2.5}	24-Hour	13.5	16.7	14.6	-12.6%	35
		Annual	5.6	6.6	6.0	-9.3%	12
Site 4: State Street and Erie Boulevard	PM ₁₀	24-Hour	33.0	46.0	46.4	0.8%	150
	PM _{2.5}	24-Hour	13.5	15.5	15.2	-2.2%	35
		Annual	5.6	6.2	6.1	-1.1%	12
Notes:							
PM ₁₀ background concentration was based on 2016-2018 data at the Rochester 2 monitoring station. PM _{2.5} background concentrations for 24-hour and annual PM _{2.5} were based on 2016-2018 data at the East Syracuse monitoring station.							
Concentrations are based on the projected roadway conditions in the 2026 analysis year as a reasonable representative for the estimated time of completion.							

This table (and the similar table for the Viaduct Alternative) have been added to **Section 6-2-3** (Environmental Justice) of this FDR/FEIS to supplement the discussion of air quality effects.

As documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, neither the Community Grid Alternative or Viaduct Alternative would result in disproportionately high and adverse effects on environmental justice communities. This assessment considered effects on environmental justice communities related to neighborhood character; transportation; land acquisition displacement and relocation; parks and recreational resources; visual and aesthetic considerations; air quality; traffic noise; and construction effects.

Regarding cumulative effects, as stated in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, the traffic data that were used as input for the air quality modeling accounted for the traffic associated with known or reasonably foreseeable future projects. Thus, the results of the air quality modeling reflect the traffic effects of the proposed action combined with that of reasonably foreseeable future actions. As a result, cumulative effects were accounted for in the air quality analyses.

- C 9-256: NYSDOT must move the roundabout more than 600 feet from STEAM at Dr. King Elementary School. The complete failure to analyze disproportionate impacts of air pollution to a majority Black student population at the school or utilize best practices is particularly problematic because the NYSDOT failed to meet the mandates set in E.O. 12898. In addition, the DEIS recognizes that there may be increases in ambient MSATs in localized areas, including schools, in close proximity to the redesigned roadway sections yet fails to provide the requisite “hard look” at how air pollution will impact the environmental justice community. NYSDOT must undo the harm the viaduct created by overexposing children to air pollution. Shockingly, however, the DEIS places a major roadway even closer than the current viaduct. Traffic is one of the most significant sources of air pollution in schools—both indoors and outdoors; NYSDOT is completely ignoring established best practices to undo acts that created disproportionate harm to the Black school community.
- R 9-256: Subsequent to publication of the DDR/DEIS, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East. A roundabout is proposed at Van Buren Street, which is more than 600 feet from Dr. King Elementary School. BL 81 would not intersect with MLK Jr., East. MLK Jr., East would terminate at the rear driveway of Dr. King Elementary School. The FDR/FEIS (see **Sections 6-4-4.1** and **6-4-4.2**) continues to conclude that the Community Grid Alternative would not result in adverse effects on air quality. The alignment of BL 81 would farther to the east from the school than the existing I-81.
- C 9-257: Establishing a land use working group to evaluate the transfer and development of the surplus property created by the Project is a good start toward achieving an equitable outcome of the Project, but there are additional steps the NYSDOT should take to protect and restore the adjacent community. The DEIS states any new use or development of the land would be subject to the City’s zoning ordinances, but NYSDOT cannot avoid its obligations simply by stating the land is subject to zoning ordinances; rather, it must take active steps and attach conditions to the transfer of the land, creating a land trust to prevent disruption to the character of the community. Attaching conditions to the transfer of the 10- to 12.5-acre parcel of land to the City of Syracuse will prevent negative and disproportionate adverse impacts from the I-81 Project and also ensure the Black community benefits from the Project.
- R 9-257: At this stage of the Project, NYSDOT will not attach any conditions or create a land trust for any of the parcels that are to become available for non-transportation purposes. Upon completion of the Project, any property no longer needed for transportation purposes may be deemed surplus, and abandoned and thereafter, the State may divest its real property interest to a grantee. NYSDOT must comply with Federal and State laws, rules and regulations for the surplus, abandonment and divestment of the State’s real property interests. NYSDOT is committed to establishing a Land Use Working Group during final design prior to the start of the construction phases. The purpose of the Land Use Working Group is to work with the community and interested stakeholders such as NYCLU, SHA, Syracuse School district, and others in developing the framework for use of potential surplus property. The concept of

forming a land trust as a potential grantee can be explored by other groups. However, forming a land trust is outside the scope of NYSDOT's authority.

BUILDING A BETTER FUTURE: THE STRUCTURAL RACISM BUILT IN I-81, AND HOW TO TEAR IT DOWN

C 9-258: The NYCLU submitted its report called "Building a Better Future: The Structural Racism Built in I-81, and How to Tear it Down," which was submitted as comments on the preliminary DDR/DEIS (April 2019).

R 9-258: NYSDOT reviewed this report and provided responses in Appendix M-5 of the DDR/DEIS published in July 2021.

UNIVERSITY OF BUFFALO SCHOOL OF LAW ENVIRONMENTAL ADVOCACY CLINIC

C 9-259: Re-working placement and other aspects of the roundabout would convincingly demonstrate care for the community.

To ensure Environmental Justice is reflected in the FEIS requires the redesign of the roundabout planned in the proximity of STEAM at Dr. King Elementary School at 416 E. Raynor Avenue. Historically, the children who attend STEAM at Dr. King Elementary School have borne the disparate burden of air pollution from being so close to the viaduct.

The replacement of the viaduct with the roundabout will not do enough to mitigate traffic air pollution at this site. And although fewer cars are projected to traverse this section of roadway than while the viaduct stands, the proximity of the cars will still deteriorate the air quality at the school and cause noise pollution. The roadway, projected to carry more than 30,000 vehicles per day, must be reimagined. It should be at minimum 600 feet away from STEAM at Dr. King Elementary School. In addition, high levels of traffic near schools pose a physical danger to students. With roughly 75 percent of U.S. school-age children taken to school via vehicle, traffic congestion near schools is already an issue without the placement of a roundabout facilitating more than 30,000 vehicles nearby. Logically, the more vehicles within proximity to a school, the higher the risk and incidence of traffic-related injuries.

R 9-259: As described in **Section 3.4.3** of this FDR/FEIS, NYSDOT and FHWA are no longer proposing a roundabout at MLK, Jr. East. The design of the Community Grid Alternative has been refined since the publication of the DDR/DEIS. MLK, Jr. East would end at the rear driveway of the school, with no connection to BL 81, and therefore, it would carry less traffic past the school. A roundabout is proposed at Van Buren Street, north of the school.

C 9-260: To ensure Environmental Justice is reflected in the FEIS, the return of land to dispossessed communities should be explored. DEIS Section 6-2-3 states that NYSDOT would form a land use working group consisting of diverse representatives to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel.

The FEIS should go further. The Lead Agencies should commit to returning the land to the community, in the form of a land trust or by guaranteeing benefits to the community in the

form of a community-benefits agreement. Gentrification is a clear danger in the destructive aftermath of Urban Renewal. The best way to avoid it, and to begin to remedy the wealth gap created by Urban Renewal's taking of property when developing, is to give the land back to the community it was taken from. The FEIS should commit to returning the land to the community from which it was taken.

- R 9-260: At this stage of the project, NYSDOT will not attach any conditions or create a land trust for any of the parcels that are to become available for non-transportation purposes. The purpose of the Land Use Working Group is to work with the community and interested stakeholders such as NYCLU, SHA, Syracuse School District, and others in developing the framework for use of potential surplus property. The concept of forming a land trust as a potential grantee can be explored by other groups. However, forming a land trust is outside the scope of NYSDOT's authority. **Section 6-3-2.4** of the DDR/DEIS and FDR/FEIS describes the potential direct, indirect, and cumulative effects of the Community Grid Alternative on economic conditions in the Central Study Area. As stated in **Section 6-3-2.4.1**, much of the housing near the viaduct is publicly owned and/or subsidized property with rent protection for its occupants, and the Community Grid Alternative would not displace any residents through property acquisition. The DDR/DEIS and FDR/FEIS also discloses the specific business displacements resulting from the Community Grid Alternative, and the process NYSDOT would follow to inform occupants and assist in their relocation. Furthermore, the DDR/DEIS and FDR/FEIS describes the potential surplus transportation right-of-way that could become available for development or other use under the Community Grid Alternative once transportation infrastructure is removed (refer to **Section 6-2-1.4.3**). The dispersion and limited size (majority less than 2 acres) of these sites, as well as the predominance of publicly owned lands and land held by large institutions, would limit potential indirect displacement due to rising rents or increased property values.
- C 9-261: Lead poisoning is a classic indicator of an Environmental Justice community and the DEIS inadequately addresses it. In pursuit of Environmental Justice, the FEIS needs to include a more complete analysis of potential lead poisoning dangers and make an explicit commitment to employing the most modern lead-safe practices to keep the workers and the community safe. In its current state, the DEIS does not sufficiently address the potential hazards surrounding lead exposure, nor does it adequately describe any mitigation efforts that will take place to ensure that the people in this community will not be exposed to lead. It is essential that the FEIS do a significantly more thorough assessment exploring relevant literature that demonstrates their reliance on recent scientific and sociological developments in this area.
- R 9-261: See response to **Comment 9-254**.
- C 9-262: The DEIS fails to appropriately consider the effects of the preferred alternative on Environmental Justice communities by fully offering opportunities to the voices of impacted residents. The DEIS fails to acknowledge that the preferred alternative has a significant potential to cause disproportionately high and adverse effects on the minority and low-income populations in the vicinity of construction areas. It is vital that community members whose

lives will be directly and significantly impacted by the I-81 Viaduct Project are given adequate opportunities for meaningful engagement by Lead Agencies and do not feel shut out of the planning and decision-making process. These neighborhoods deserve a healthier and more equitable outcome than what unfolded when the I-81 viaduct was originally built. Pursuant to federal guidance, their needs must be more fully addressed throughout the planning and construction phases of the I-81 Viaduct Project than what has been offered in the DEIS.

We therefore suggest that the Lead Agencies commit to a collaborative relationship with the environmental justice community in the Central Study Area during the planning and construction phases of the I-81 Viaduct Project. Only by keeping an open dialogue with the community can the Lead Agencies hear their concerns during the process in a timely fashion, adjust accordingly, all the while ensuring that Environmental Justice is upheld throughout the process. This commitment would suppress fears that the Lead Agencies will stop listening to the community as soon as they are out of the NEPA process.

R 9-262: See response to **Comments 9-255 and 9-280**. NYSDOT has conducted outreach with environmental justice communities throughout the development of the DDR/DEIS (refer to **Section 6-2-3.4** for a description of these outreach activities). Prior to the start of construction, NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan with NYSDOT's review and approval, the specifics cannot be stated at this time. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation. At a minimum, the plan would include establishment of a centrally located, on-site project outreach office; establishment of a telephone hotline; a website with information about street closures, detours, nighttime construction activities, and locations and times of particularly noisy construction activities; and a specific communication schedule and procedures for providing construction status updates and other construction-related information to the general public (refer to **Section 4.5.2** for additional details).

C 9-263: There is an inadequate foundation for the finding in the DEIS that substantial gentrification or displacement is not anticipated. The choices made for the I-81 Viaduct Project will have a lasting effect on the shape of the community, however, and must be more fully assessed before an FEIS is issued.

The DEIS states "the land surrounding the potential redevelopment parcels is primarily publicly owned land, major institutions, and public or rent-subsidized housing." The DEIS goes on to anticipate that new development will be driven by student housing and medical professionals. Researchers know that an increase in new residents with higher economic power leads to gentrification. The economic power of students and medical professionals fits the model likely to spur gentrification. Therefore, it must be more fully analyzed before the FEIS is issued. Additionally, the impact of the anticipated increase in student housing should be more fully assessed to determine whether it could increase disconnect in the community because of the transient nature of students.

Considering these facts, the DEIS does not adequately address why this time will be different. It states that there are “limited redevelopment opportunities.” This conclusory qualitative analysis is not enough. The FEIS should include a detailed explanation for why the Lead Agencies do not anticipate gentrification. For example, it appears highly likely that redevelopment in the wake of the Community Grid Alternative could lead to disadvantageous gentrification if land use decisions are not approached thoughtfully.

- R 9-263: In total, implementation of the Community Grid Alternative could result in 10 to 12.5 acres of surplus transportation right-of-way, depending on how much land would be needed to accommodate the highway, sidewalk, shared use (bicycle and pedestrian) path, and other transportation features. As shown in **Figure 6-3-2-3** of the DDR/DEIS and FDR/FEIS, most of the parcels that would be available for redevelopment would be under two acres in size. Given the limited number and size of the parcels, the uses introduced by the potential redevelopment of these parcels would not be of a scale or type that would substantively alter or accelerate existing market forces within the area. The land surrounding the potential redevelopment parcels is primarily publicly owned land, major institutions, and public or rent-subsidized housing. These uses would not be displaced without further public actions and associated environmental reviews, and the residential and worker populations associated with these uses would continue to be the dominant market forces influencing property values and land uses in the area. In addition, outside of the limited redevelopment opportunities presented by the Community Grid Alternative, there are few developable parcels within the Project Area, which limits potential for broader market effects due to induced growth. The City of Syracuse Planning and Zoning regulations will control the use of new developable lots within the City. The City of Syracuse developed a Comprehensive Master Plan 2040 to establish multiple policies to meet its vision for the future.

NYSDOT will form a land use working group consisting of representatives from the City, the City’s school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of potential surplus parcels.

- C 9-264: There is no mention of the hotel voucher program in the July 2021 DEIS, which is disquieting because residents will be disrupted and will not have the opportunity to relocate to hotels during these times. The FEIS should provide an explanation of why the hotel voucher program was removed from the plans leading to the 2021 DEIS.
- R 9-264: Construction of the Preferred Alternative would not require the relocation of residents. Voluntary relocation is outside the scope of the I-81 Viaduct Project. In urban areas where quiet conditions prevail no equipment will emit noise above the 70 dbA measured at an offset distance of 50 feet. NYSDOT proposes multiple noise abatement measures in **Table 4-7** to minimize disruptions. Although contractors have not been selected at this point in the design phases and specific construction schedules have yet to be developed, NYSDOT recognizes the close proximity of schools, places of worship, medical facilities, and residential areas adjacent to the viaduct and will work with the community to minimize noise impacts.

C 9-265: The DEIS is insufficient in its consideration of displacement generally. The DEIS states that the Community Grid Alternative would result in the displacement of four commercial buildings, but no private residents. The four businesses that would be displaced are a furniture shop, an automotive repair facility, a fast-food restaurant, and a Syracuse Housing Authority office and maintenance garage. All of these buildings are in environmental justice communities. Therefore, the DEIS conclusion that for the Community Grid Alternative there will not be adverse effects on environmental justice populations with respect to land acquisition, displacement, and relocation is unfounded.

The FEIS should not only acknowledge that the displacement of residents and commercial businesses will result in adverse effects but go further. The Lead Agencies must note that, even if mitigated, being displaced is emotionally, financially, and physically challenging on a personal level. Furthermore, it uproots community and social structure. This should be more fully acknowledged and planned for in the FEIS. Moreover, the FEIS should consider the detrimental impact of historic displacement on minority communities and do everything possible to ensure this does not happen with the I-81 Viaduct Project.

R 9-265: As stated in the DDR/DEIS and FDR/FEIS, the Community Grid Alternative would displace four businesses (a total of four buildings), and it would not displace any residents. Those impacted would benefit by being financially compensated at fair market value for their business. NYSDOT would provide relocation assistance to displaced businesses, and there is adequate replacement commercial space in the vicinity of their existing locations. Therefore, the DDR/DEIS and FDR/FEIS conclude that the Community Grid Alternative would not result in adverse effects from land acquisition, displacement, and relocation. Refer to **Section 6-3-1.4.1** of this FDR/FEIS for more information.

C 9-266: The DEIS presents a wholly inadequate exploration and plan for lead paint containment and the associated potential for lead poisoning. As part of the description of the effects of construction of the Community Grid Alternative, the DEIS gives a cursory treatment of the containment of lead paint particles on the to-be-demolished metal portions of the viaduct. Is the plan to employ Class A Containment to ensure that this community—which has suffered and is suffering from the effects of the I-81 viaduct—will suffer no future harms caused by lead leaching from the current I-81 Viaduct Project? No mention is made of what Class Containment will be utilized in Sections 6-2-3, 6-4-9, or Chapter 4-4-2. The DEIS must offer sufficient discussion as to the level of protection that will be needed to minimize or prevent lead escaping into the surrounding neighborhoods. The residents of the impacted community deserve more clarity and commitment. Moreover, the DEIS must offer remedial measures to address any inadvertent lead exposure in the event it does occur.

R 9-266: See response to **Comment 9-262**. Management of lead-based paint will be completed by following NYSDOT specifications and guidance, which in turn meet New York State Department of Environmental Conservation, New York State Department of Health and U.S. Environmental protection Agency regulations. The containment methods to be utilized depend on the process that is occurring (scrapping, cutting, etc.). Based on the process, the

Contractor will select the appropriate containment method and associated practices. These work practices have been followed many times and prevent contamination of the environment and exposure to the public, but oversight of the Contractor's work procedures is an important part of the process. Reference to and inclusion of these requirements are prepared and will be found in the construction documents and are not included in the EIS. The Contractor will be required to follow NYSDOT specifications Section 107-05 with regards to Safety and Health Requirements; Section 107-10 for Managing Surplus Material and Waste; Section 107-11 with regards to Air Quality Protection; and Sections 570 and 571 for Paint Removal Operations and Disposal as applicable.

C 9-267: A more comprehensive health analysis for children and the general population as it pertains to Environmental Justice is needed as the FEIS is developed is needed to fully understand possible health impacts for residents, commuters, pedestrians, and project workers. Furthermore, there is no mention of asthma in the air quality or environmental justice sections. Comment C 5-4 in Appendix M-5 requested a comprehensive health study. The response to this comment was insufficient and Section 6-2-3 does not include a comprehensive health study through an Environmental Justice scope. This health analysis must include a plan to prevent future disparate environmental exposure, treat current disparate exposure, and remedy past disparate impacts. The high interconnectivity between environmentally unjust highway-planning practices and other factors such as inadequate access to medical and preventative care leads to poor health. The Lead Agencies should consider this when doing a comprehensive health analysis and should call for a system that proactively addresses such issues and the disparate incidence rates of asthma, obesity, diabetes, lung cancer, and a range of mental health and developmental problems.

R 9-267: The previous response describes the outdoor ambient air quality monitoring program that would be implemented during construction of the Project, including the commitment to locate a monitor outdoors in the vicinity of Dr. King Elementary School. The real-time particulate matter data collected at the monitors would be compared to the USEPA's National Ambient Air Quality Standards (NAAQS). These standards are designed to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly, with an adequate margin of safety.

The previous response also documents the air quality analyses that were conducted for the Project. As described, the particulate matter concentrations at the analysis sites would be below the NAAQS.

As described in **Chapter 4 (Table 4-7)** of this FDR/FEIS, FHWA and NYSDOT have developed a robust set of construction mitigation measures and best practices for the Project. These measures include a requirement that the Contractor prepare a Lead Exposure Control Plan that includes practices and measures that would be implemented to ensure the safety and health of employees who may be exposed to lead during construction work. By extension, this plan would be developed to protect the general public. **Section 6-4-9** of the DDR/DEIS

and FDR/FEIS documents the potential to encounter lead-based paint under each project alternative and NYSDOT protocols to handle its removal, transport, and disposal.

Based on FHWA procedures and standard practice, the analyses conducted for the Project during the environmental review process, and the robust set of mitigation measures that would be implemented during construction, including an outdoor ambient air quality monitoring program, a health analysis of the Project is not required or warranted.

C 9-268: The use of Buffalo and Rochester air quality as representative of Syracuse's air quality is inadequate. Air quality is not the same in any single given City from neighborhood to neighborhood, let alone from City to City. Syracuse, Rochester, and Buffalo are similarly situated Northeastern cities, but taking for granted that their air quality is similar enough to stand in for one another is inadequate. At the very least, Syracuse-specific air quality analyses for carbon monoxide, particulate matter (10 micrometers or less), nitrogen dioxide, and ozone must be completed and evaluated when compiling the FEIS. Additionally, the representative monitoring stations in Syracuse are located in East Syracuse, which may not be representative of all the study areas in Syracuse.

R 9-268: As discussed in the DDR/DEIS and FDR/FEIS, concentrations of relevant regulated pollutants at stations closest to the Project Area were used in the air quality analysis. While monitored concentrations will vary between the East Syracuse, Rochester, and Buffalo NYSDEC monitoring stations, the monitored concentrations at each station were well below the National Ambient Air Quality Standards (NAAQS) for all pollutants. Based on NYSDEC guidance, the nearest monitoring station with available data was used for each pollutant to represent existing conditions. When a monitoring station is not available within the Project Area, the nearest monitoring station is used where topographic, climate, and emissions conditions are similar (i.e., located in urban areas with climate characteristics of northeastern cities).

Data are available in the Syracuse Project Area for the primary pollutant of concern for the air quality analysis, PM_{2.5}. Therefore, a review of 24-hour average and annual average PM_{2.5} monitored concentrations at the East Syracuse, Rochester, and Buffalo NYSDEC monitoring stations was performed and found concentrations all below the NAAQS. The most recent reported concentrations by NYSDEC range between 13.1 to 18.3 µm³ and 5.3 to 7.3 µm³ for 24-hour and annual average concentrations, respectively. Therefore, existing concentrations presented in the DDR/DEIS and FDR/FEIS of monitored pollutants are expected to be representative of existing concentrations within the Project Area.

C 9-269: The DEIS inadequately considers COVID-19 going forward. The effects of the pandemic continue to develop and ripple through all aspects of our lives. The FEIS should reflect an analysis of the impact COVID-19 on the Project area and how the effects of the ongoing pandemic will change the outcome of their analyses about the permanent effects of the Community Grid Alternative. The FEIS must include an analysis into the post-pandemic needs of the community to assess if any portions of the Community Grid Alternative can be adjusted to better suit the needs of the community.

- R 9-269: For the construction traffic analyses, a 10 percent reduction due to current telecommuting trends was applied, as this represents a near-term, temporary condition where capacity would be reduced and therefore small reductions in traffic would have a greater effect. For the final build conditions, this reduction was not applied and while a 10 percent demand reduction might have some effect on design at some locations, NYSDOT believes the overall Community Grid Alternative design would not be affected. Since the design year projections are more than 30 years in the future and less certain than near-term conditions, NYSDOT did not apply these telecommuting reductions to the long-term conditions.
- C 9-270: The DEIS insufficiently assesses noise abatement. Of the 19 receivers used in the Noise Study to analyze the traffic noise and abatement from 15 proposed noise blockers, only two of the 19 receivers studied registered a perceptible benefit from the proposed noise barriers, leaving 17 of those receivers with perceptible and unabated noise increases from the altered traffic patterns. There should be increased consideration for noise barriers to further abate the perceptible noise increases. The DEIS proposes measures that leave 89 percent of the proposed route with unabated noise increases exempt from placement of noise barriers, which seems unnecessarily high. While the cost of implementation must be weighed, so too must the corresponding decrease in home value should these blockers not be placed.
- R 9-270: As documented in **Section 6-4-6** and **Appendix H** of the DDR/DEIS and FDR/FEIS, a noise analysis was conducted for the Project in accordance with the NYSDOT Noise Policy and FHWA's highway traffic noise regulations (23 CFR 772). As described in **Section 6-4-6**, traffic noise modeling was conducted at 2,817 receivers (representing 4,563 receptors) within the established study area. Noise abatement measures were assessed at the locations identified as impacted. To be recommended, a noise abatement measure must be deemed both feasible and reasonable, as defined in NYSDOT Noise Policy. For the Viaduct Alternative, 36 barriers and/or barrier systems were evaluated; for the Community Grid Alternative, 37 barriers and/or barrier systems were evaluated. Under both alternatives, 15 noise barriers were found to be both feasible and reasonable and are recommended for construction. **Section 6-4-6** documents the results of the noise abatement analysis, including the number of impacted receptors and the number of receptors with "perceptible" noise level changes (i.e., increases or decreases of more than 3 dBA) both with and without abatement.
- C 9-271: The DEIS states that the Community Grid Alternative would result in increased chloride concentrations in Onondaga Lake to potentially 643.3 mg/L and anticipates significant jumps in the Central, South, East, and North study areas that will have negative effects on the local aquatic species. There is no mention in the DEIS of alternative methods to the stormwater best management practices (BMPs) that would achieve lower chloride concentrations in the immediate vicinities. This is inadequate. The DEIS attempts to obscure the effects that will be felt in these immediate vicinities by highlighting how little the increase in chloride concentration will affect Lake Onondaga, an analysis that is irrelevant and ignores the effects on the biota that live in the immediate vicinity of the I-81 Viaduct Project areas. The Lead Agencies should

include a specific account of what species will be affected by the increased chloride concentrations in the immediate study areas in the FEIS.

- R 9-271: As documented in **Section 6-4-7** of the DDR/DEIS and FDR/FEIS, the potential effects of the Build Alternatives on surface waters were analyzed using the FHWA's "Pollutant Loadings Analysis" and "Toler Analysis" methodologies. FHWA's Pollutant Loading Analysis is a quantitative procedure for estimating the magnitude and frequency of occurrence, on a watershed scale, of in-stream concentrations of pollutants caused by stormwater runoff, namely copper, lead, zinc, total organic carbon, chemical oxygen demand, nitrate + nitrite nitrogen, total kjeldahl nitrogen, phosphorus, total suspended solids, and volatile suspended solids. Similarly, the Toler Analysis estimates the effects of chloride on surface waters, resulting from applications of highway deicing salts within the watershed. **Section 6-4-7** and **Appendix I-4** of the DDR/DEIS and FDR/FEIS documents the results of these analyses.

As discussed in **Section 6-4-7**, the Project would have an overall beneficial effect on water quality. Water quality improvements would result from the implementation of the Project as a result of separating the stormwater runoff from the combined sewer system and the use of stormwater best management practices to reduce levels of pollutants. The separate stormwater runoff conveyance system would result in decreasing the likelihood of combined sewer overflows. Further, the Build Alternatives would result in reduced pollutant loading as compared to the No Build Alternative.

The Build Alternatives would result in higher chloride concentrations within adjacent water bodies as compared to the No Build Alternative because of an increase in total lane miles that would require deicing. However, the total acreage of impervious area within the study area would be reduced through changes in land use outside of the highway lanes but within the NYSDOT right-of-way. Restoration of open areas would be controlled so that no more than 35 percent of these areas would be constructed as impervious surfaces (see **Chapter 5** of the DDR/DEIS and FDR/FEIS). The reduction in impervious area outside of the highway lanes but within the NYSDOT right-of-way could lead to a reduction in chloride applications and a benefit to water quality not indicated by the Toler Analysis.

As documented in **Section 6-4-7**, the effects of the chloride concentrations to Onondaga Lake were assessed. The USEPA chronic toxicity water quality criteria concentration of chloride, for the majority of aquatic species, is 230 mg/L, while the acute toxicity concentration is 860 mg/L. The chloride in Onondaga Lake is already elevated above the chronic toxicity water quality criteria, and under both build alternatives, the chloride concentration would be below the acute toxicity concentration. The effects of chloride concentrations on streams were also assessed for the Community Grid Alternative. **Section 6-4-7** documents the results of those assessments.

There are no known stormwater management practices (SMPs) that treat or substantially remove chlorides from surface water or groundwater discharges. Chloride discharges can be managed through infiltration SMPs including green infrastructure components (e.g., source-control stormwater

management, such as permeable pavements, and bioretention areas, such as rain gardens), which would be considered for integration in the Project during final design.

Section 6-4-8 of the DDR/DEIS and FDR/FEIS documents the effect of increased chloride levels to Lower Onondaga Creek and Onondaga Lake on Lake Sturgeon. The assessment concludes that Lake Sturgeon would not be expected to show any obvious behavior response and that the chloride concentrations entering the lake from Onondaga Creek would be diluted. Therefore, Lake Sturgeon are unlikely to be affected by the projected increase in chloride concentrations from the Project.

NYSDOT has a well-established set of best practices that allow the agency to perform snow and ice operations with extreme efficiency. In order to minimize salt usage, NYSDOT has prescribed salt application rates that have been established for specific temperature and weather conditions; uses state-of-the-art salt spreading equipment that allows the agency to dispense salt at specific application rates; routinely calibrates salt application equipment; trains supervisors and operators on the proper use of salt; properly stores and handles salt; uses GPS on plow trucks to help manage the agency's response; uses brine for pre-storm anti-icing; and uses treated salt where appropriate. NYSDOT continually evaluates its snow and ice program to make sure that the agency is properly balancing environmental concerns with NYSDOT's responsibility to provide safe and passable roadways.

- C 9-272: The DEIS is not presented in a user-friendly format which creates a barrier to accessing the information. Presenting the sections in individual files rather than also offering a single complete document in one cohesive file made it very difficult to search for information in different but connected sections on larger and higher-bandwidth devices. Rather than being able to perform a simple Control+F to search for key terms, each file must be opened and searched separately, which is unnecessarily inefficient and time consuming. This lack of accessibility prevents the Lead Agencies from garnering the most extensive, substantive commentary.
- R 9-272: The DDR/DEIS was prepared in and posted in a format that complies with USEPA's e-NEPA requirements. Public review of the DDR/DEIS produced numerous extensive, substantive comments, which are provided in **Appendix M-6**. The Project website provides Project information materials and visual aids, such as a video and renderings of the Community Grid Alternative and the presentations (with sign language and Spanish-language interpretation) from the Project public hearings. During the DDR/DEIS public comment period, a "virtual project information room" was available on the Project website, which provided display boards, presentations, and videos about the Project. NYSDOT will continue to utilize visual aids throughout the course of the Project.
- C 9-273: The I-81 Viaduct Project website is not presented in a user-friendly format effectively creating a barrier to access of information. The content is segmented in a manner that makes the website very time consuming to use and information is easy to overlook. The Virtual Public Outreach Center is unnecessarily complicated and confusing to navigate, especially for someone who is not computer-savvy.

- R 9-273: NYSDOT designed its new website prior to the release of the DDR/DEIS to provide a more concise and user-friendly platform in community engagement. The Virtual Public Outreach Tour provided users the opportunity to review aspects of the I-81 Viaduct Project from the comfort of their homes. The virtual room provided a Tutorial Map that allowed the reader to quickly jump to any information that existed within the room.
- C 9-274: The DEIS Appendices are insufficiently navigable. For example, Appendix M-5, "Responses to Comments Received" is poorly organized and does not contain a table of contents despite the document being 196 pages in length. To find any section breaks, one must download the document and open the bookmarks tab in Adobe. Similarly, Appendix C4 is 817 pages and does not have a table of contents to help residents and other stakeholders navigate it. Appendix F is divided into two sections, the second of which has more than 100 unnumbered pages of grainy documents. The FEIS must be organized in a more accessible manner.
- R 9-274: The DDR/DEIS was prepared in and posted in a format that complies with USEPA's e-NEPA requirements. The DDR/DEIS has a searchable function in Adobe that allows the reader to quickly find any topic they are interested in. Due to the large volume of information and analysis on the Project, both FHWA and NYSDOT agreed to extend the comment period by an additional 30 days. The Project website provides Project information materials and visual aids, such as a video and renderings of the Community Grid Alternative and the presentations (with sign language and Spanish-language interpretation) from the Project public hearings. During the DDR/DEIS public comment period, a "virtual project information room" was available on the Project website, which provided display boards, presentations, and videos about the Project. NYSDOT will continue to utilize visual aids throughout the course of the Project.
- C 9-275: In what may be an error, DDR/DEIS Section 6-4-3 mentions 'gateways' as a potential way to mitigate the negative effects of both alternatives. However, both alternatives cite to inconsistent portions of Appendix F. The Viaduct Alternative, DDR/DEIS Section 6-4-3, 6-228 cites to Section 4.4.2 of Appendix F, titled 'Community Grid Alternative,' similarly, DDR/DEIS Section 6-4-3, 6-232, there is a gateway citation to Appendix F Section 4.4.3, which does not exist.
- R 9-275: The text in the FDR/FEIS has been modified to correct the appendix references.
- C 9-276: Spelling errors in the DEIS include in: Chapter 8 Summary of Alternatives on page 8-6: "displacing 555 employees"; and in Appendix F on page 131 "from sprint to fall."
- R 9-276: The text has been edited accordingly.
- C 9-277: FHWA and NYSDOT failed to provide the community with opportunities for "meaningful involvement" in several ways during the DEIS process. There was insufficient public involvement due to significant gaps of time between public meetings. For example, no neighborhood or community meetings were held for approximately two and a half years

between December 6, 2016, and June 25, 2019, while the DEIS was being developed; and no neighborhood or community meetings were held between September 11, 2019, and the Virtual DDR/DEIS and EDPL Public Hearing on August 17, 2021.

- R 9-277: NYSDOT conducted extensive outreach throughout the preparation of the DDR/DEIS. There were multiple public meetings, including open houses, neighborhood meetings, and stakeholder meetings, as well as numerous one-on-one meetings. NYSDOT staff attended meetings of community organizations and businesses groups, and NYSDOT staff regularly participated in public festivals and similar gatherings (some of these events were not scheduled during 2020 and 2021 because of the Covid pandemic). NYSDOT continually engaged with resource agencies, the City of Syracuse, Onondaga County, and elected officials. NYSDOT also responded to requests from media outlets. Refer to **Table M-1-1** in **Appendix M-1** of the DDR/DEIS and FDR/FEIS for more information. NYSDOT continues to engage the community, City of Syracuse, local hiring advocates, and other interested stakeholders related to the I-81 Viaduct Project. Public outreach will continue into the final design and construction phases. See public outreach commitments in **Table 4-7**.
- C 9-278: There was insufficient opportunity for meaningful community involvement due to timing of meetings and lack of appropriate COVID accommodations. The Neighborhood Meetings held in August and September 2021 were in-person meetings, and the flyer did not indicate an option for remote participation. Meetings were all held from 6:00-8:00 PM on weeknights which likely excluded some community members from being able to participate. The Lead Agencies should have provided some in-person opportunities for comment on mornings, afternoons, and weekends. This would have allowed more members of the community to contribute their perspectives on the I-81 Viaduct Project.
- R 9-278: NYSDOT provided opportunities for in-person and virtual participation by the public. There were both in-person and virtual public hearings for the DDR/DEIS, with sessions held at different times, as well as an in-person open house held at the Oncenter, a centrally located, transit-accessible location. In addition to the public hearings, supplementary meetings held in the City as well as surroundings areas offered opportunity for one-on-one discussion between the interested public and the Project team, as well as the opportunity to submit written comments or dictate them privately to a stenographer. Throughout the DDR/DEIS public review period, NYSDOT hosted a virtual outreach center that contained the information that was made available at the in-person public hearing. The link to the virtual outreach center was available via the project website. A project video and other materials were also posted on YouTube.com. Finally, NYSDOT and FHWA offered multiple means to provide comments on the DDR/DEIS. The virtual and public hearings were conducted during daytime and evening hours to maximize participation. The interested public could also submit comments through the Project's website using an electronic comment form, send comments by email, submit written comment forms or letters, provide oral testimony at neighborhood meetings, and provide comments using the Project's telephone hotline. Public involvement would not end at

the environmental review stage. NYSDOT will conduct more outreach as the Project moves into the final design and construction phases.

- C 9-279: There was inadequate DEIS access for Limited English Proficiency (LEP) participants. The I-81 Viaduct Project website is in English with no direct option to translate the content into Spanish or any other languages commonly spoken in neighborhoods in proximity to the construction area. This left community members at the mercy of digital translation services which can be inaccurate and misleading. Translators should be used in preparing the FEIS to avoid repetition of this oversight. It appears that the “Language Assistance” functionality is not available on the current site. To be compliant with Executive Order 13,166 and NYSDOT’s LEP Plan requirements, the project website should be updated to include this feature. In addition to amending the website, to give LEP residents the opportunity for meaningful participation in the I-81 Viaduct Project, the FEIS should be translated into the languages most frequently spoken by residents in the project area (Spanish, Chinese, Haitian Creole, Italian, Korean, and Russian).
- R 9-279: The data and plan to guide the involvement of LEP populations are summarized in the I-81 Viaduct Project Memo on LEP Analysis and Approach” which is in **Appendix M-3**. See also **Section 9.2.6** of the DDR/DEIS and FDR/FEIS.
- A “language line service,” which provides on demand interpretation via telephone for numerous languages, was available at the scoping and open house meetings. Spanish interpreters were available at the scoping meetings, open houses, Stakeholders’ Committee meetings, public hearings, and neighborhood and community meetings. The Language Assistance feature on the Project website was temporarily unavailable but has been restored.
- An EIS is a technical and legal document. Translating the document could result in ambiguities, technical inaccuracies, loss of meaning/intent, and other challenges. As a result, FHWA and NYSDOT do not provide translated versions of EIS documents.
- C 9-280: The DEIS comment event at STEAM at Dr. King Elementary School on September 9, 2021, was insufficiently staffed. Long queues developed when a significant number of attendees gathered and wished to relay their comments on the DEIS because there was only one transcriber present. In addition, there was one unmarked phone at the meeting where people could call in their comments which went largely unused.
- R 9-280: The Dr. King Elementary School Neighborhood meeting held on September 9, 2021 had as many Project team members as the other neighborhood meetings. At that meeting, NYSDOT extended the end time to ensure everyone had the opportunity to provide their comments.
- C 9-281: In the process leading to the FEIS, the Lead Agencies should commit to continued public participation during the implementation and construction phases of the I-81 Viaduct Project. In the interest of Environmental Justice, it is critical that the Lead Agencies remain in frequent contact with the residents who live near the viaduct. To build trust and maintain open lines of communication between the Lead Agencies and the residents most affected by the I-81

Viaduct Project, the Lead Agencies should consider creating a community-led Environmental Justice Working Group that will act as liaison for residents near the work zones and will operate throughout the construction phase and beyond. This working group can help ensure that the public remains involved and that the needs and concerns of the residents continue to be met.

R 9-281: As described in **Section 4.5.2** of the FDR/FEIS, prior to the start of construction, NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan, the specifics cannot be stated at this time, but NYSDOT would establish specific working groups if needed. NYSDOT is committed to continued engagement with the Environmental Justice community. Please refer to **Sections 4.5.2** and **6-2-3.4** of the DDR/DEIS and this FDR/FEIS.

C 9-282: Under NEPA, Environmental Justice requires that the Lead Agencies provide detailed information regarding their commitments to continued public engagement with environmental justice communities during the implementation/construction phase, an estimated five-year commitment if the Community Grid Alternative is implemented. A "Next Steps" graphic for the Project indicated that FHWA and NYSDOT intend that there will be public participation throughout every phase of the I-81 Viaduct Project, including the Final Design/Construction Phase from 2022 through 2027. The graphic, however, does not provide any detailed information about what opportunities there will be for public participation. Similarly, in the video of the Interstate I-81 Viaduct Project Public Hearing August 17 and 18, 2021, the narrator says only one sentence regarding ongoing community involvement: "There will be community engagement throughout construction."

In Chapter 6, there is only one sentence mentioning ongoing opportunities for public involvement: "Additional meetings will be scheduled, as appropriate, as the Project progresses." Reference to the project website should have been included along with a commitment to keep interested parties informed.

It is not until one navigates to **Table 4-7** in the DEIS that any detail is provided about the Lead Agencies' plans for community engagement during the construction phase of the Project. This information is not located in Chapter 9: Agency Coordination and Public Outreach, as one would expect it to be. In **Table 4-7**, the Lead Agencies outline several commitments to the public during the implementation/construction phase of the Project. The FEIS should recommit and provide more detailed information regarding each of these commitments.

A Project Outreach Center had once been operational but ceased operations in November 2019. While the center was operational, it was only open for six hours per week, on Tuesdays and Thursdays between 11:00 AM to 2:00 PM. The Project Outreach Center should be operational on a more inclusive basis during the construction phase with hours that best accommodate the needs of the community. The Lead Agencies should commit to the Project Outreach Center remaining operational during the entirety of the construction phase and having hours during some weeknights and on weekends monthly. The Project Outreach

Center might be best placed nearby the footprint of construction so that local affected residents may conveniently visit and voice their concerns.

- R 9-282: NYSDOT has conducted outreach with environmental justice communities throughout the development of the DDR/DEIS and FDR/FEIS (refer to **Section 6-2-3.4** for a description of these outreach activities). Prior to the start of construction, NYSDOT would require that the Contractor prepare a communication and public outreach plan for DOT's review and approval. The plan would be implemented throughout the construction phases. Contractors have yet to be selected at this stage of the project so specifics of the plan's implementation cannot be stated. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation. At a minimum, the plan would include establishment of a centrally located, on-site project outreach office; establishment of a telephone hotline; a website with information about street closures, detours, nighttime construction activities, and locations and times of particularly noisy construction activities; and a specific communication schedule and procedures for providing construction status updates and other construction-related information to the general public (refer to **Section 4.5.2** for additional details).
- C 9-283: The Lead Agencies must consider the needs of environmental justice communities as public engagement plans are developed. These considerations include locating the public outreach center in an environmental justice neighborhood, locating it near public transportation, having hours of operation that serve the needs of the community, and making necessary accommodations for LEP residents. In addition to the commitments outlined in Table 4-7, the Lead Agencies have committed in the DEIS to "continuing to develop its program for local hiring and commitments for contracting minority-owned businesses." Specific details of this program should be reflected in the FEIS, including how information will be shared with the public. Similarly, the Lead Agencies state in the DEIS that they "would continue to coordinate with the Syracuse Housing Authority regarding property acquisition and its master plan." Specific details of the property acquisition program should be reflected in the FEIS, including how information will be shared with the affected community.
- R 9-283: See response above.
- C 9-284: The FEIS must include a detailed plan for involving environmental justice communities in the development and implementation of adverse effect mitigation measures and monitoring during and after construction. The specific details of the comprehensive construction plan should also be outlined in the FEIS—including specific ways to mitigate and monitor noise and air pollution both during and after construction—along with a plan for continued collaboration with parents, faculty, and staff at the Syracuse City School District throughout construction. The comprehensive construction plan in the FEIS must include commitments to create safe walking and cycling zones; implement regulations on construction vehicles idling and parking near the school; ensure parking access for school buses, parents' vehicles, and public transportation; limit work during school hours; remove hazards in a timely manner; and designate play zones during construction.

- R 9-284: NYSDOT has conducted outreach with environmental justice communities throughout the development of the DDR/DEIS and FDR/FEIS (refer to **Section 6-2-3.4** for a description of these outreach activities). Prior to the start of construction, NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan, the specifics cannot be stated at this time. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation. At a minimum, the plan would include establishment of a centrally located, on-site project outreach office; establishment of a telephone hotline; a website with information about street closures, detours, nighttime construction activities, and locations and times of particularly noisy construction activities; and a specific communication schedule and procedures for providing construction status updates and other construction-related information to the general public. Also, as noted in **Section 4.5.2** of the FDR/FEIS, NYSDOT has committed to engaging with the community during development of this construction communication program and other elements to mitigate community impacts. This includes maintaining safe pedestrian and bicycle access.
- C 9-285: The Lead Agencies must consider the environmental justice population of the approximately 600 unhoused people living in Syracuse. A search of Sections 6-2-1 Neighborhood Character, 6-2-2 Social Groups Benefited or Harmed, 6-2-3 Environmental Justice, and 6-3-1 Land Acquisition, Displacement, and Relocation for the terms "unhoused" and "homeless" yields no results, demonstrating that the DEIS does not contemplate the effects of the Project on this population.
- R 9-285: As discussed in **Section 6-2-3** of this FDR/FEIS, unhoused/homeless populations were considered when identifying the low-income (environmental justice) communities within the Environmental Justice Study Area. However, no known unique and discrete populations (e.g., homeless encampments) were identified in the Study Area; thus, unhoused/homeless populations were not determined to be environmental justice communities with respect to this assessment.
- C 9-286: The DEIS lacks specificity regarding a plan for urban forest management. The DEIS lists 14 landscape units, yet only three of the landscape units (Units 4, 6, and 13) mention the existence of trees. The DEIS should analyze what species of trees exist; what benefits these trees provide to the Central Study Area community; what types of trees will be planted as a result of either alternative; and how the adverse effects of removing trees are best mitigated by keeping old trees whenever possible, not by replacing full-grown trees with saplings. The FEIS should list in detail the extent to which the current trees, deciduous or not, are mostly male or female; the precise species of trees present, along with the age and size of said trees; what efforts can be made to preserve existing full-grown trees; and, the benefits and pitfalls of planting different species/types of trees to replace and add to the existing urban forest, e.g., deciduous, fruit or nut bearing, evergreen, and so on.

It has been common practice for urban planners to favor male trees since they do not produce seeds, but this practice led to entire urban landscapes plagued by excessive pollen, which in turn can lead to adverse health effects like hay fever and asthma. Thus, an urban forest can also have negative health impacts if improperly managed. The FEIS should include a more complete discussion of the plan for urban forest management.

R 9-286: NYSDOT Guidance for Landscape Development is provided in the Highway Design Manual, Chapter 28, "Landscape Architecture and Community Design for Transportation" (https://www.dot.ny.gov/divisions/engineering/design/dqab/hdm/hdm-repository/chapt_28.pdf). It is NYSDOT's policy to have an integrated landscape stewardship approach to the design, construction, and operation of its facilities. NYSDOT does not have a formula or any specific requirement for numbers or sizes of replacement trees. The goal is a suitable, context sensitive, sustainable landscape restoration for any disturbance. The City's Urban Master Plan will be used as a reference when developing the landscape restoration and planting plans during final design.

C 9-287: Preventing the mismanagement of urban jungles is a readily available way to prevent further environmental inequity. In the Central Study Area—a community that is both marginalized and is slowly being taken over by external developers—there is a critical need to restore a sense of self-determination in the community. The best way to do this goes beyond seeking input as to what types of trees residents would like to see in their environment—although this is a great start—and to take advantage of the fact that both alternatives would result in several tracts of vacant land. Ideally, this land should be returned either to (a) the original owner or their heirs, if the land was originally taken via eminent domain at any point in the last 100 years, or (b) placed in a public trust controlled by members of the community, so they can determine what to do with it, e.g., build parks, community centers. At best, the DEIS ignores how the residents of the Central Study Area, as well as other communities, are at severe risk of losing their collective identity in a wave of 'new development' that the DEIS posits. To this end, the FEIS should also take a closer look at the nature of each specific property within each study area. Trees are but one element of the complex and interconnected environment that people inhabit.

DDR/DEIS Section 6-4-3, 3.3, attempts to analyze the indirect effects of removing buildings to "facilitate new development," claiming that it analyzed the effects this will have on low income and/or minority groups by citing to DEIS Section 6-2-2, which only states the presumption that any new development will be similar, before citing to Section 6-2-2.4, which is specifically not an analysis of the potential effects this Project will have on low income/minority communities. This section does, however, note that the cumulative effect of increased connectivity between neighborhoods could invite new types of residents, yet again presumes no change in demographics. The FEIS should include a more robust analysis of the indirect effects of removing buildings to "facilitate new development," and a mitigation analysis for a potential demographic change.

R 9-287: NYSDOT will establish a Land Use Working Group to work with the community and interested stakeholders like the City, NYCLU, SHA, Syracuse school district, etc. in developing the

framework for use of potential surplus property. At this stage of the project, NYSDOT will not attach any conditions or create a land trust for any of the parcels that are to become available for non-transportation purposes. The surplus land would not become available until close to construction completion. NYSDOT is committed to establishing this Land Use Working Group during final design prior to the start of the construction phases. The DDR/DEIS and FDR/FEIS describe the potential surplus transportation right-of-way that could become available for development or other use under the Community Grid Alternative once transportation infrastructure is removed (refer to **Section 6-2-1.4.3**). The dispersion and limited size of these sites, as well as the predominance of publicly owned lands and land held by large institutions, would limit substantial changes in development patterns and limit potential indirect displacement due to rising rents or increased property values.

- C 9-288: Certain historical properties, like the Oakwood Cemetery, are adversely affected by the highway's original construction. The Oakwood Cemetery in particular had its main entrance removed in order to make way for the highway. Now, under the Community Grid Alternative, the opportunity presents itself to not only right a past wrong, but to create a "gateway" into this community. The DEIS praises the addition of "gateways" as a positive effect of both alternatives.
- R 9-288: The Community Grid Alternative includes a new northbound exit from BL 81 to Colvin Street, which would improve access to Oakwood Cemetery. Other changes in access to Oakwood Cemetery are beyond the scope of this Project and not under consideration at this time. However, implementation of the Project would not preclude others from making improvements to the grounds of the Oakwood Cemetery as part of an independent, future action. In a July 22, 2021, letter to NYSDOT, Oakwood Cemeteries, Inc., "the sole entity authorized to take positions on behalf of the cemetery," commented that they have no plans to reopen the original main entrance of the cemetery due to concerns relating to vandalism and public safety.
- C 9-289: The DEIS is incongruous in its crash reduction assessment. The DEIS indicates a 4 percent reduction in Crash Conflicts for the Viaduct Alternative and a 20 percent reduction in Crash Conflicts for the Community Grid Alternative, yet the total monetary difference in Crash Cost Benefit is listed as \$34,765. From Table 8-1 to Chapter 5 to Appendix C-4, the number of crashes and the locational benefit or costs are separated through charts and tables. Outlining which locations are projected to have more severe accidents, which increase the cost per accident to correlate with a 16 percent reduction in Crash Conflicts to only a 1 percent reduction of Crash Cost Benefit, would allow further study to derive alternative measures at those locations to increase the benefit of having fewer conflicts and promote a comprehensive and complete safety analysis within the scope of this project.
- R 9-289: The Crash Conflict and Crash Cost Benefit analyses used different methodologies to provide various metrics to evaluate alternative concepts from a safety perspective. The Crash Conflict analysis used the FHWA's Surrogate Safety Analysis Model to estimate total system vehicle conflicts, based on vehicle trajectories from the project's traffic simulation model. Traffic conflict is a reliable surrogate safety measure but does not necessarily correlate with severity

of crashes. In general, freeway corridors have higher potential for injury and fatal crashes due to the higher-speed nature of these facilities. For the Crash Cost Benefit analysis, crash reduction factors from NYSDOT's latest applicable "Post Implementation Evaluation System – Reduction Factor Report" and the Federal Highway Administration's Crash Modification Factors Clearinghouse were applied based on specific geometric, operational, and traffic volume changes in the network to predict increases/decreases in crashes for freeway segments and intersections affected by the project. For each segment and intersection, costs were derived using a severity distribution of crashes based on the statewide distribution of fatal, injury, and property damage only crashes. Since the project's alternatives were designed to meet current standards and mitigate locations that currently exhibit crash rates higher than the statewide average, there is no projection of locations with more severe crashes in the future. However, NYSDOT maintains a list of priority investigation locations, which are investigated annually in accordance with the Department's Highway Safety Investigation Procedures to determine crash patterns and identify countermeasures if new high-crash locations emerge.

- C 9-290: The DEIS does not address the practicality of its proposed three-minute time limit on idling engines during construction to mitigate effects on air quality. The FEIS should explain how this standard will be monitored or regulated. A well-intentioned regulation without any enforcement mechanism may simply be ignored, leading to the adverse air quality effects it sought to avoid.
- R 9-290: NYSDOT will be responsible for ensuring that Contractors comply with contract requirements. NYSDOT will have a presence on all construction contracts implemented under the I-81 Viaduct Project.

9-14 FORM LETTERS (VIA ACLU/NYCLU)

Several thousand submissions of a letter containing the text below were received by NYSDOT and FHWA. These comments are based on a letter and report prepared by the NYCLU.

- C 9-291: More than 50 years ago, Interstate 81 ripped through a working-class Black neighborhood in Syracuse. It displaced long-time residents and ensured that poverty, pollution, and a lack of resources would hurt the community that lived in the highway's shadow that persists today.

I agree with NYSDOT's current preferred option to remove the 1.4-mile stretch of the viaduct and replace it with a street-level grid.

Removing the viaduct is a great first step toward racial justice. However, we need to continue to advocate for environmental, racial, and economic justice to ensure the fair and equitable treatment of community members who live in the shadow of the viaduct.

The permanent removal of the viaduct could improve housing conditions, health outcomes, and economic and educational opportunities for all people in Syracuse. In order to do that, NYSDOT should consider the following recommendations in its EIS, which will guide the construction project moving forward:

Protect Land Use

- A land transfer policy must be put in place before returning the land to the City of Syracuse that restores and enhances communities impacted by I-81, specifically the predominately Black community adjacent to the viaduct.
- Create a land trust for the eight acres directly east of Martin Luther King Boulevard East for development by residents connected to the community.
- Accommodate residents who would like to relocate with an automatic right to return.

Protect Health and Wealth

- Conduct a cumulative exposure analysis for residents who live in the communities within 600 feet of the viaduct that includes a lead, noise, and air analysis and abatement.
- Conduct a community health needs assessment.
- Do not use Wilson Park as a staging site for construction or construction materials.
- Create a Community Restoration Fund.
- Offer market-rate buyouts, rent subsidies, and/or temporary relocation assistance for people who want to move.
- Conduct an easement reassessment so that renters receive easement payments.

Access to Opportunity

- Jobs generated by the project must go to the people who live directly adjacent to the viaduct and 30 percent of them should go to Black and Brown Syracuse residents.
- Apply for the federal “SEP 14” local hiring pilot program, and limit the hiring requirements to Syracuse residents. The SEP 14 application must be accompanied by a community workforce agreement to legally require that unions hire local Syracuse residents, with a preference for impacted Syracuse neighborhoods. The DOT must also provide independent oversight to ensure the goals of the labor agreement are met.
- Expand roads starting east of MLK Blvd. to the street grid and east side of Syracuse.
- Provide governmental oversight on all aspects of this project until it is complete.

Protect School Children

- Create a comprehensive construction plan in collaboration with parents, faculty, and staff at the Syracuse City School District.
- Move the proposed highway access ramp so it is at least 600 feet from STEAM at Dr. King Elementary School.
- Conduct a study to determine if the community grid will remain a major roadway, as defined by 30,000 cars or more daily.

These recommendations will assist the NYSDOT in meeting its own stated goals for the project. These include enhancing economic growth and vitality in the City, re-connecting the Syracuse community, and providing better access to jobs, businesses, and services in downtown Syracuse and beyond.

The recommendations will also help right a historic wrong and create more equitable outcomes for the entire region.

R 9-291: Please refer to Section 9-13, New York Civil Liberties Union (NYCLU) for detailed responses to these comments.

9-15 NYU SCHOOL OF LAW, CIVIL RIGHTS CLINIC AND CENTER ON RACE, INEQUALITY, AND THE LAW (NYU LAW)

C 9-292: NYU Law supports the community-preferred Community Grid Alternative because it has the potential to help restore a community marginalized since the construction of the I-81 viaduct. However, the Community Grid Alternative, as currently proposed, still fails to adequately address the viaduct's legacy of racial segregation and disproportionate harm on Black communities in Syracuse. NYSDOT is legally obligated—pursuant to Title VII of the Civil Rights Act of 1964, Executive Order 12898, and SEQRA requirements—to approach this project in a way that addresses these historical and contemporary harms, including the effects of environmental racism, by ensuring the following action items (see below). By taking ownership of these past mistakes, Syracuse and NYSDOT have the chance to avoid repeating history and shape the project according to the needs of the impacted community.

R 9-292: Comment noted.

C 9-293: (1) Before NYSDOT moves forward with construction, it must work closely with relevant agencies and affected residents to develop both temporary relocation and long-term right-of-return plans to ensure that all displaced residents have the right to return to their former neighborhoods once the construction is completed.

R 9-293: Construction of the Preferred Alternative would not require the relocation of residents.

C 9-294: (2) Current residents are entitled to reap the benefits of a redeveloped neighborhood that is no longer physically isolated from the rest of the City. As such, it is incumbent on NYSDOT to plan now for the eventual return of these residents to a reimagined southern Syracuse. However, NYSDOT has not included any serious or realistic discussion of these impacts in its DEIS, nor has it attempted to mitigate the harms its actions will cause. Increasing property taxes, rent, and the cost of living—all caused by gentrification—will have major economic repercussions on current low-income residents. Instead, and without any clear evidence, the DEIS has concluded the Community Grid Alternative is “not anticipated to result in substantial gentrification” within the Project Area. But the Community Grid Alternative is designed to result in new development, which often increases property values and higher property taxes for current owners, raising rents, making housing too expensive for current residents.

- NYSDOT must speak with Southside residents and community leaders to ensure its plan will spur economic growth and stability in Syracuse without pushing out marginalized communities of color through gentrification by establishing a community land trust for any land it currently owns that will not become part of the community grid.

- Other recommendations that NYSDOT can act upon to fulfill its obligation to the environmental justice communities of Syracuse are: requiring the provision of affordable

housing as part of any residential development on land made available for redevelopment along I-81 viaduct corridor; creating policies and programs to increase the development of affordable housing in areas that have seen an increase in the development of market-rate and luxury housing, such as Downtown, the Inner Harbor, and the University Neighborhood; working with the City of Syracuse to immediately create an oversight board made up of residents from the impacted community, to report on the success of these programs and requirements. Unlike the proposed “land-use working group,” this board should have significant input on any rezoning, including the ability to veto rezoning proposals entirely.

- R 9-294: As noted above, the Preferred Alternative would not require the relocation of residents. **Section 6-3-2.4** of the DDR/DEIS and FDR/FEIS describes the potential direct, indirect, and cumulative effects of the Community Grid Alternative on economic conditions in the Central Study Area. As stated in **Section 6-3-2.4.1**, much of the housing near the viaduct is publicly owned and/or subsidized property with rent protection for its occupants, and the Community Grid Alternative would not displace any residents through property acquisition. The DDR/DEIS and FDR/FEIS also disclose the specific business displacements resulting from the Community Grid Alternative, and the process NYSDOT would follow to inform occupants and assist in their relocation. Furthermore, the DDR/DEIS and FDR/FEIS describe the potential surplus transportation right-of-way that could become available for development or other use under the Community Grid Alternative once transportation infrastructure is removed (refer to **Section 6-2-1.4.3**). The dispersion and limited size (majority less than 2 acres) of these sites, as well as the predominance of publicly owned lands and land held by large institutions, would limit potential indirect displacement due to rising rents or increased property values.

At this stage of the project, NYSDOT will not attach any conditions or create a land trust for any of the parcels that are to become available for non-transportation purposes. However, NYSDOT will establish a Land Use Working Group to work with the community and interested stakeholders such as NYCLU, SHA, Syracuse School District, and others in developing the framework for use of potential surplus property. The concept of forming a land trust as a potential grantee can be explored by other groups. However, forming a land trust or oversight board is outside the scope of NYSDOT's authority; land use development, housing, and zoning are beyond NYSDOT's jurisdiction.

- C 9-295: (3) NYSDOT and Syracuse Must Adopt a Community Working Agreement that Incorporates a Priority Labor Agreement (PLA) per the Urban Jobs Task Force announced by the U.S. Secretary of Transportation. The PLA must include the requirement that a certain percentage of the construction workforce is constituted of residents from specific zip codes of very specific communities whose racial and ethnic concentration are unique to south Syracuse. A substantial percentage—30 percent—of the construction workforce should be required to come from these impacted communities.

- R 9-295: Please see response to **Comment 9-336**.

C 9-296: (4) Health Concerns: To ensure the CGA provides a better quality of life for impacted residents, NYSDOT must hire a third-party to monitor the environmental impact, involve community members in oversight, and better protect community institutions. NYSDOT and Syracuse must do more to reduce the harm that will accompany construction by committing to greater protections for local community resources that will be directly impacted; of primary concern is using Wilson Park as a staging site for construction, which will only worsen the negative health impacts on park goers. NYSDOT should construct an alternative, safer park for the use of residents during construction and beyond. If the construction of such an alternative park is not possible, NYSDOT should reconsider the use of Wilson Park as a staging site and move the staging site further from such a valuable outdoor community resource.

(5) Construction will disrupt residents' ability to safely navigate the neighborhood, especially because many people walk to important community institutions such as churches and schools. In addition, the noise, pollution, and vehicular traffic from construction will also disrupt these important community centers themselves. NYSDOT should hire a third party to monitor the environmental impacts of the I-81 redevelopment with community oversight. The group should be impartial with environmental and construction expertise and regularly assess and report on the environmental impact of the construction and the Community Grid Alternative. Reports on issues such as exposure to lead and other by products of construction should be made available at regular public meetings and for any concerned citizen upon request. In addition, it is important that impacted residents can participate in a structured and meaningful way for the duration of the construction and beyond.

R 9-296: To help minimize and mitigate the adverse effects of construction activities on the community, NYSDOT would require its contractors to comply with measures to minimize or otherwise mitigate effects, as listed in **Table 4-7**. The list includes measures to address traffic diversions, dust and debris, increases in emissions and noise, access to businesses and residences, and community engagement. Cumulatively, these measures would help address adverse effects during the construction period. Regarding Wilson Park, please refer to response to **Comment 9-9**.

NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan with NYSDOT's review and approval, the specifics cannot be stated at this time; however, advisory community groups may be included if deemed necessary. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation.

C 9-297: (6) Placement of the Roundabout: The roundabout must be moved to a location where its environmental impact will not disproportionately harm vulnerable populations. NYSDOT must create a specific plan to protect any individuals who will be exposed to the concentration of traffic-related air pollution due to the roundabout's placement. This plan must ensure any construction and staging, including the proposed roundabout, is at least 1,200 feet away from

any school, homes, and other frequently occupied buildings. Further, NYSDOT must consider noise and pollution mitigation options like vegetation and noise barriers.

- R 9-297: As stated in **Section 3.4.3** of this FDR/FEIS, based on public input, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East. In addition, under NYSDOT's revised design for the Community Grid Alternative, presented in this FDR/FEIS, there would be no vehicular connection between BL 81 and MLK, Jr. East. The removal of the roundabout at MLK, Jr. East from the design of the Community Grid Alternative would lessen traffic on MLK, Jr. East and reduce the duration of construction adjacent to the school.

The noise analysis indicated that, based on the NYSDOT Noise Policy, predicted future noise levels in the area around the Dr. King Elementary School are below the noise abatement criteria for schools (refer to **Table 6-4-6-2** of the DDR/DEIS and FDR/FEIS for FHWA Noise Abatement Criteria and Activity Categories). Therefore, noise abatement is not recommended for this area. Note that under the Community Grid Alternative, the roadbed of the current I-81 will be removed; however, a portion of the embankment would be left in place. The roadway alignment of the Community Grid Alternative would be at a lower elevation than the current I-81 and horizontally farther to the east, and the remaining portion of the former I-81 embankment would form a berm between the new roadway and the school. Under the current design, the berm would form a barrier up to 20 feet high in some of the more northern locations and back to grade in the area of the proposed shared use (bicycle/pedestrian) path along MLK, Jr. East. A benefit of this berm is that a berm is normally more effective at reducing noise than a concrete barrier. Regardless, the noise study has shown that a concrete noise barrier in this location would not be effective enough to be recommended for reducing traffic noise at the Dr. King School.

As stated in **Chapter 4 (Table 4-7)**, **Section 6-2-3**, and **Section 6-4-4** of this FDR/FEIS, an outdoor ambient air quality monitoring program would be implemented during construction of the Project and would be overseen by NYSDOT. The program would consist of real-time particulate monitoring at a few locations within the local community, including locations within the environmental justice community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design.

9-16 CENTRAL NEW YORK FAIR HOUSING

- C 9-298: CNY Fair Housing agrees with NYSDOT's conclusion that the Community Grid is the best option for replacing the I-81 viaduct in Downtown Syracuse. However, we are concerned about the project's adverse impacts on residents of the project area—particularly during the construction period. NYSDOT must detail its plans for mitigation for residents living adjacent to the viaduct in the I-81 project's FEIS.

Mitigation must cover effects of unacceptable air and noise on residents within 100 feet of the highway in the project area.

- R 9-298: **Table 4-7, Measures to Minimize Community Impacts** in the FDR/FEIS identifies commitments to methods that would be included in the contract for monitoring or air quality and the abatement of construction noise. In addition, **Section 6-4-6.5.5** identifies additional potential abatement strategies that could be incorporated into the construction Project.
- C 9-299: NYSDOT must not only consider direct displacement, as was done in the DEIS, but also the potential indirect displacement resulting from less than voluntary moves by residents seeking to escape the disruption that will occur during the removal and replacement of the viaduct. This is especially urgent in light of the Syracuse Housing Authority's plans to redevelop several hundred units of public housing within the I-81 project area and any potential market pressures for new market-rate housing near downtown Syracuse and University Hill.
- R 9-299: Under the Community Grid Alternative, no residents would be displaced. **Section 6-3-2.4** of the DDR/DEIS and FDR/FEIS describes the potential direct, indirect, and cumulative effects of the Community Grid Alternative on economic conditions in the Central Study Area. As stated in **Section 6-3-2.4.1**, much of the housing near the viaduct is publicly owned and/or subsidized property with rent protection for its occupants, and the Community Grid Alternative would not displace any residents through property acquisition. The DDR/DEIS and FDR/FEIS also discloses the specific business displacements resulting from the Community Grid Alternative, and the process NYSDOT would follow to inform occupants and assist in their relocation. Furthermore, the DDR/DEIS and FDR/FEIS describes the potential surplus transportation right-of-way that could become available for development or other use under the Community Grid Alternative once transportation infrastructure is removed (refer to **Section 6-2-1.4.3**). The dispersion and limited size of these sites, as well as the predominance of publicly owned lands and land held by large institutions, would limit potential indirect displacement due to rising rents or increased property values.
- C 9-300: NYSDOT must mitigate the I-81 project's adverse impacts on the neighborhoods situated along the current viaduct or risk violating Title VI of the Civil Rights Act of 1962. Because the project will have such diverse impacts, one simple way to do this is to create a Housing Trust Fund that can provide flexible funding for relocation assistance and counseling, the construction of new housing, noise and air pollution abatement, and any other strategy necessary to mitigate the project's adverse impacts on residents and housing throughout the project area. This fund should be administered by a dedicated staff who will work with residents of the project area to address their housing needs and facilitate their housing choices.
- R 9-300: The Project would not result in residential displacements, and a housing trust fund is beyond the scope of this Project.
- C 9-301: NYSDOT must also adjust its designs for surface-level streets such as Almond, Harrison, and Adams, to reduce vehicular traffic volumes and speeds through residential neighborhoods as much as possible. The EIS should include new designs for these streets that will calm traffic by reducing the number and width of travel lanes, reducing turning radii at intersections, and

introducing signalized crosswalks at intersections such as Almond/Monroe and Almond/Madison. These design changes will improve the safety and livability of neighborhoods within the project area, benefits that far outweigh any minor adjustment to travel times for those passing through.

- R 9-301: As described in **Section 3.4.3** of the DDR/DEIS and FDR/FES, traffic calming measures would be implemented on BL 81 between Colvin Street and just south of MLK, Jr. East to encourage motorists to reduce speeds from 55 mph to 30 mph. These measures include gradually reduced posted speed limits and physical alterations to BL 81, such as fewer lanes, narrowed shoulders, roadway curves, and curbing. Both northbound and southbound BL 81 would transition from three lanes to two lanes north of Colvin Street. Almond Street would have a posted speed limit of 30 mph. Pedestrian-activated signals at Almond/Monroe and Almond/Madison Streets will be considered in final design. For land widths, refer to response to **Comment 4-43**.

9-17 FAMILIES FOR LEAD FREEDOM NOW!

- C 9-302: In support of Families for Lead Freedom Now!'s call to protect the safety and health of workers and families within environmental justice communities during bridge work on the I-81 Viaduct Project, Families for Lead Freedom Now! strongly and clearly urges NYSDOT to adopt the following twelve (12) recommendations:
1. A Health Impact Assessment for lead. NYSDOT should complete its work on assessing lead risks from demolition of the I-81 Viaduct with a health assessment per guidelines from the Centers for Disease Control's online publication titled "CDC Recommendations for Improving Health through Transportation Policy." Specifically, the third and fourth recommendations bulleted under the heading "Design to Minimize Adverse Health and Safety Consequences." (<https://www.cdc.gov/transportation/recommendation.htm>)
- R 9-302: As described in **Chapter 4 (Table 4-7)** of this FDR/FEIS, FHWA and NYSDOT have developed a robust set of construction mitigation measures and best practices for the Project. These measures include a requirement that the Contractor prepare a Lead Exposure Control Plan that includes practices and measures that would be implemented to ensure the safety and health of employees who may be exposed to lead during construction work. By extension, this plan would be developed to protect the general public. **Section 6-4-9** of the DDR/DEIS and FDR/FEIS documents the potential to encounter lead-based paint under each project alternative and NYSDOT protocols to handle its removal, transport, and disposal. Also, as stated in **Table 4-7** and **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, the Contractor would develop and implement a Dust Control Plan.
- C 9-303: 2. Proper oversight of Lead Exposure Control Plan's implementation should include an on-site field liaison. DEIS Section 6-4-9.4: "Environmental Consequences of the Community Grid Alternative," says that "limited quantities of lead-based paint will be generated by the project...." However, information is lacking about (a) the concentrations of lead in the paint on the elevated highway near the Syracuse Housing Authority communities; and (b) whether

Class A containment measures (Section 6-4-9) will be employed for bridge demolition. Given that just a single sugar packet's worth of lead dust can poison multiple children to a tragic degree, proper oversight of the demolition's Developer/Contractors/Subcontractors is critical to protecting Syracuse's families and children living in the vicinity of bridge demolition. In addition, while Section 6-4-9.4.1 acknowledges the probability of "structures with lead-based paint" being involved in a demolition process (p. 6-513), there is no description—other than a general, boiler-plate statement ("Testing of each structure would be conducted to identify special lead handling and containment requirements to insure the safety of the workers and the surrounding public during the performance of the work.") - of what specific actions the Contractor will be required to take.

Such generalities raise important questions: What is the NYSDOT pathway to ensuring and verifying that proper testing occurs and then results in proper handling and containment? Who will be engaged in oversight of Contractors and Subcontractors? Who at NYSDOT—not just the Developer or Contractor—can be contacted when the public has concerns? How will safety protocols be communicated?

Per the Detroit Demolition Protocol, an on-site field liaison should be present to ensure compliance with effective lead containment methods. See: Carla Bezold, et al. "Demolition Activity and Elevated Blood Lead Levels among Children in Detroit, Michigan, 2014-2018." *Int'l Jnl of Envir. Research and Public Health*. September, 2020.<https://pubmed.ncbi.nlm.nih.gov/32824913/>

- R 9-303: **Section 6-4-9** of this FDR/FEIS has been updated to clarify that all bridges and structures that would be affected by the Project are presumed to have residual lead-based paint (LBP). **Section 6-4-9** has also been updated to clarify that lead sampling would be performed during final design and/or during construction activities. All lead sample collection would follow the guidelines set forth under 40 CFR 745.227, which outlines work practice standards as well as the appropriate methods to perform laboratory analysis and evaluate the results of analyzed samples. If lead is determined to be present, sampling, abatement, project monitoring (air monitoring), handling, and disposal would be performed in accordance with local, state, and federal regulations. During sampling and construction, a health and safety plan, including dust monitoring, would be implemented for the protection of onsite personnel. Best management practices would be implemented, such as materials management procedures, during construction. The removal, packaging for transportation, and disposal of materials with confirmed LBP would be conducted in accordance with federal, state, and local regulations.

Proposed demolition work would be conducted in accordance with the contract documents, or as directed by NYSDOT, and the Contractor would conduct all demolition and removal operations in accordance with the contract documents and local building codes. Prior to construction, the Contractor would be required to prepare and submit a demolition plan to NYSDOT for approval, in accordance with NYSDOT standard specifications. Prior to construction, the Contractor would also be required to prepare and submit a Lead-Exposure Control Plan (LECP) to NYSDOT for approval, in accordance with NYSDOT standard

specifications. Any locations that require open, abrasive blasting of LBP on steel would require Class A containment measures.

NYSDOT would require the Contractor to prepare and submit a communication and public outreach plan for NYSDOT approval prior to the start of construction. **Chapter 4 (Section 4.5.2 and Table 4-7)** of this FDR/FEIS provides additional discussion.

- C 9-304: 3. Additions to the Lead Exposure Control Plan: Tacky mats, air monitoring, and public outreach. In the interest of ensuring the well-being of the surrounding community, we strongly recommend that NYSDOT conduct robust public outreach to ensure nearby residents understand the meaning, purpose, and verification methods for protecting themselves from lead hazards during demolition work. All nearby residents (six-block area) have a right to know about the dangers of chemical hazards from the demolition of the I-81 Viaduct, and the demolition of nearby buildings. By “robust public outreach” is meant door-to-door canvassing; coordinating with refugee/New American community leaders to convene meetings with their community members; working with NYCLU, Legal Services of Central NY, and other community groups with relationships among nearby residents to bring members to meetings; and hiring public health outreach workers to communicate this message to residents.

A Lead Exposure Control Plan should include these items:

- a. Provide tacky mats for all residents of SHA housing, and non-SHA housing, within a six-block radius of I-81.
- b. Conduct regular air monitoring of lead dust within a quarter-mile radius.
- c. Provide regular outreach about environmental hazards, their control, and personal protection to residents in a six-block radius of demolition. Such outreach could be developed with either the Falk School of Public Health or the Upstate Public Health Program.

The six-block radius is recommended because, as per our Recommendation No. 9, children from nearby SHA properties may play with families living closer to the I-81 demolition site.

- R 9-304: Please see response to **Comment 9-303**.

- C 9-305: 4. Project bidding specifications should include (a) required safe work practices and (b) required community-protective demolition techniques of lead-containing structures. We call for protection of the community from the removal / demolition of structures taken by eminent domain processes. This should include soil and air testing during demolition of structures taken by eminent domain. (per pp. 6-509; 6-513) Boilerplate language in Section 6-4-9.4.1 does not sufficiently indicate how either workers' or residents' health will be protected from lead poisoning during this process. Indeed, specific safe work practices and specific community-protective demolition techniques should be used. Their use is critical in order to best minimize lead dust generation and contamination of workers and the community. These work practices and demolition techniques should be required as a primary approach to minimizing lead dust generation and contamination.

- The use of such specific work practices and demolition techniques should be included in the project bidding specifications, and should indicate that such practices and techniques “shall be used.”
- Complete details on protection from lead exposure should be included in the Developer’s/ Contractor’s Lead Exposure Control Plan.
- NYSDOT’s oversight of this process should be fully articulated in both an HIA and the Developer’s/ Contractor’s Lead Exposure Control Plan.

R 9-305: Please see response to **Comment 9-303**.

C 9-306: 5. Use Class “A” Containment methods for viaduct demolition.

When demolition of the viaduct span occurs, protection of the community in the Lead Exposure Control Plan should adhere to the requirements of “Class A Containment” used for bridge paint removal operations (p. 6-509).

The properly sealed and fitted tarp or similar containment structure must be in place. This tarp needs to adequately contain lead dust and prevent contamination of the air, water, and soil in the vicinity of the I-81 viaduct.

Any casual visual inspection of the viaduct girders indicates the presence of large amounts of peeling bridge paint that appears ready to flake off, crumble, and spread lead dust throughout our community.

R 9-306: Please see response to **Comment 9-303**.

C 9-307: 6. Conduct air and soil sampling within a quarter mile for lead levels. During demolition of the viaduct, in addition to Class A containment methods, the Contractor should conduct regular testing of the air, and pre-and post-project testing of the soil, for lead contamination within a quarter-mile radius for the duration of the viaduct demolition work. Further, lead soil sampling of playgrounds, ball fields, and related public use areas within a quarter mile of the viaduct demolition area should be conducted beforehand to obtain a baseline understanding of soil lead levels, then measured again upon completion of the project. This data should be made available for public health purposes.

The quarter-mile measurement is based on field studies of building demolitions in St. Louis, MO, and the related rise in cases of childhood lead poisoning. We recognize there is a difference between a building demolition and bridge demolition work. But until a clear community safety standard is set for bridge demolition, we recommend applying the lessons of the St. Louis building demolition study to the I-81 bridge viaduct work. See: Bernhard, Blythe. “St. Louis demolitions bring renewed risk for lead poisoning.” St. Louis Post Dispatch. Jan. 7, 2019.

R 9-307: As documented in **Section 6-4-10** and **Appendix L** of the DDR/DEIS and FDR/FEIS, a Hazardous Waste/Contaminated Materials Assessment was prepared for the Project to identify the potential to encounter hazardous and contaminated materials during proposed

construction. An environmental site assessment (ESA) Phase II investigation would be performed during final design and prior to construction to characterize soils and groundwater in locations that have been identified as having the potential to encounter contaminated materials during proposed construction. These investigations would be performed to determine the presence or absence of contamination, to assist in the development of material-handling cost estimates, and to select and develop procedures for the protection of onsite workers and the adjacent public during proposed construction activities.

Section 6-4-9 of this FDR/FEIS has been updated to clarify that lead sampling would be performed during final design and/or during construction activities. All lead sample collection would follow the guidelines set forth under 40 CFR 745.227, which outlines work practice standards as well as the appropriate methods to perform laboratory analysis and evaluate the results of analyzed samples. If lead is determined to be present, sampling, abatement, project monitoring (air monitoring), handling, and disposal would be performed in accordance with federal, state, and local regulations. During sampling and construction, a health and safety plan, including dust monitoring, would be implemented for the protection of onsite personnel. Best management practices would be implemented, such as materials management procedures, during construction. The removal, packaging for transportation, and disposal of materials with confirmed LBP would be conducted in accordance with federal, state, and local regulations.

- C 9-308: 7. Protect workers from lead dust during demolition. Everything possible should be done to prevent the carrying home of lead dust by the employee to his or her family. In addition to the Class A containment method (p. 6-509), NYSDOT should require the Contractor to (1) keep the ground beneath the demolition work clean of lead dust, and (2) provide workers easy access to clean work clothes, handwashing equipment, and lead-free eating facilities. Such measures should be included in a Lead Exposure Control Plan. They are fundamental to ensuring that no worker suffers lead poisoning, nor carries home lead dust and, tragically, poisons members of his/her family, including an unborn child.
- R 9-308: Please see response to **Comment 9-303**.
- C 9-309: 8. Employ third-party monitor of construction workers' health and ensure proper training of workers in OSHA respirator standards. NYSDOT should employ Upstate Medical's Occupational Health Clinical Center (<http://ohccupstate.org/>), or a qualified entity of their referral, to monitor the well-being of all workers engaged in viaduct demolition and any and all bridge work (demolition, or not) related to the I-81 Viaduct Project. Such monitoring should be part of the Developer's / Contractor's Lead Exposure Control Plan. Additionally, the Lead Exposure Control Plan should ensure that all demolition workers are properly trained in OSHA standards for respirator use if any lead fumes, of any degree, are to be generated (see: MMWR 10/13/89 for where a failure in training resulted in lead poisoning of workers).
- R 9-309: Please see response to **Comment 9-303**.

- C 9-310: 9. Provide free blood-lead testing of nearby residents (six-block radius) during demolition. NYSDOT should contract with the Onondaga County Department of Health, or another qualified agency (perhaps the Lead Poisoning Resource Center at Upstate: <https://www.upstate.edu/gch/services/lead-poisoning/>), to conduct pro-active, regular, free blood lead testing of all children living in a six-block radius, as well as airborne monitoring for lead dust, during the elevated highway demolition, particularly given the dangers of flaking paint. As a society, we have learned many startling facts in recent years about the high toxicity of even small amounts of lead in the environment. Previous experience with precautions is cited here as a guide to the most minimum of protections that a Developer/Contractor should undertake.
- R 9-310: Careful monitoring and control of the potential sources of contamination should effectively eliminate any exposures to lead dust. Emphasis should always be placed on the control of the sources of contamination as opposed to a cleanup after a release has occurred. NYSDOT does not have the authority to conduct blood sampling and testing of individuals in the general surrounding area or the collection of airborne lead in dust samples over a wider region. This type of program if enacted would have to be organized and coordinated by the New York State Department of Health or similar regional organization.
- C 9-311: 10. Publish de-identified testing results. Data from the recommended testing of air, soil, and blood-lead of both workers and children should be made public, both on the I-81 project website and to the news media, on a quarterly basis during the I-81 project. Results of testing for lead, in the aggregate and de-identified, should be made public on the I-81 project's website, with a specific tab on the I-81 project's landing page for easy location. Public release of data is consistent with the National Environmental Policy Act's underlying principles of public transparency and accountability of public agencies. It is also consistent with a spirit of accountability to environmental communities most adjacent to, and affected by, the Viaduct demolition.
- R 9-311: Comment noted and please see the responses to other comments from Families for Lead Freedom Now! Please also note that Health Insurance Portability and Accountability Act (HIPAA) regulations control the type of information that could be released.
- C 9-312: 11. Remove the viaduct through new technology designed for safety. Removal of the viaduct should be engineered to minimize lead exposure. NYSDOT should ensure workers have the properly fitting respirators to protect against lead poisoning. NYSDOT should also ensure that the Developer / Contractor reveals how it anticipates the demolition to occur far ahead of the fact given its implications for protecting human health and safety. The Lead Control Guide for Bridges and Steel Structures (1998) from Mt. Sinai and Hunter College states, "design initiatives from the engineering community and sincere commitments from the construction industry to use new technology are needed so that workplace controls are incorporated in bridge work."(<https://www.elcosh.org/record/document/1562/d000133.pdf>) Specifically, we ask: will demolition take place through torch cutting –which causes lead fumes –or by hydraulic shears or by mechanical dismantling? Will construction workers performing tasks

related to viaduct demolition have use of fully functioning HEPA vacuum attachments on their equipment?

- R 9-312: OSHA controls the use and training associated with worker respiratory protection and all OSHAs requirements will be followed by the Contractor including respiratory fit tests, respiratory protection training, respiratory selection and use, respiratory equipment maintenance, etc. Means and methods are typically chosen by the Contractor as long as they can meet the guidelines and measurement parameters identified in the specifications and the environmental regulations.

Depending on circumstance it is likely that all of the identified methods will be employed. The use of HEPA collection equipment will be reviewed and used if available and applicable to the methods being employed. All vacuum equipment that is used for collection and cleanup work shall be equipped with HEPA filters. All used filters from dust collectors, vacuums, and straw and screening from dam devices, shall be disposed of in accordance with all applicable local, State, and Federal Laws, regulations, and codes.

Each NYS construction contract contains New York State Standard Specifications that address worker Lead exposure as well as a project specific Lead Compliance program that at a minimum will address specific issues listed in the Code of Federal Regulations 29 CFR 1926.62-Lead. NYSDOT Standard specification section 107-05 Safety and Health Requirements, L. Hazardous Materials, 2. Lead Safety and Health addresses Lead on our projects. This specification section specifically requires that our Contractor provides a written Lead Compliance program addressing at a minimum the specific issues listed in 29 CFR 1926.62 (e)(2): a written Hazard Communication program and Worker Lead training program as components of the Project Safety and Health plan. The standard specifications also require the Contractor to identify and implement engineering and work practice controls to reduce exposure to lead to a level at or below the Permissible Exposure Level (PEL). These specifications also require the Contractor to supply documentation to demonstrate full compliance with 29 CFR 1926.62. These records are to include, as applicable, the completed worker lead training, completed respirator programs, air monitoring results, exposure monitoring results, worker medical monitoring results, and other such records as are necessary to document compliance with the standards.

The specific means and methods of demolition of the viaduct will be determined by the Contractor but they will have to follow the 29 CFR 1926.62 requirements and our specifications. The NYSDOT Standard specifications for lead require the removal of lead-based paint from structural steel prior to heating, welding, or flame cutting to reduce worker exposure below the PEL. In cases where the Contractor can clearly demonstrate through exposure monitoring that other work practices and engineering controls, under the oversight of a certified industrial hygienist, can effectively maintain actual worker exposure below the permissible level, exceptions can be granted.

- C 9-313: 12. Consult with community stakeholders in preparation of the Lead Exposure Control Plan. Finally, under "Commitments" in NYSDOT's Table 4-7 "Measure to Minimize Community

Impacts,” in the section marked “Contaminated Materials,” NYSDOT states it will “Require Contractor to prepare a Lead Exposure Control Plan (LECP).... By extension this plan will be developed to protect the general public.” The Developer / Contractor should consult with key stakeholders in the community (City, NYCLU, Legal Services of CNY, Families for Lead Freedom Now, Syracuse Tenants Union) about the details and implementation of such LECP as it relates to protecting “the general public.” The LECP should include an objectively robust outreach plan. We recommend contracting with a Syracuse-area Public Health Program to employ masters of public health students to engage in such public outreach.

- R 9-313: The plan is designed to prevent the release of lead dust into the surrounding area and affect the general public. As currently structured the LECP does not include a community outreach component because no impacts are allowed to occur by the Contractor that would affect the surrounding community.
- C 9-314: Human-caused lead poisoning is a matter of great concern in Syracuse, where childhood lead poisoning is already a devastating environmental disease. Preventing lead poisoning is known to have long term benefits: socially, educationally, and economically. Studies demonstrate we save money for every dollar invested in the prevention of lead poisoning. We urge NYSDOT to take appropriate actions to protect the safety and health of both workers engaged in the I-81 viaduct demolition and our very own community members.
- R 9-314: Comment noted.

9-18 NEW YORK STATE SENATOR RACHEL MAY

- C 9-315: The community grid is by far the best solution.
- R 9-315: As stated in **Section 8.3** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative has been identified as the Preferred Alternative for the I-81 Viaduct Project.
- C 9-316: The road designated in the plan as BL 81/Almond Street should be designed more in line with urban use rather than as a high-speed road. While the bike lanes and tree lined median are good ideas and should be kept, the lane width could be significantly narrowed to slow traffic. Slower traffic will encourage more pedestrian and bike usage, and shorter distances for crossing Almond Street will encourage more east-west walking and biking. Narrowing Almond Street would also free up additional land for development and public space. For too long, high-speed vehicular traffic has dictated land use in a wide swath at the center of our City; it is time to give that land back to human-scale, urban uses.
- R 9-316: NYSDOT BL 81/Almond Street would have a posted speed limit of 30 mph consistent with other City streets; traffic calming measures would be implemented beginning north of Colvin Street to encourage motorists to slow their speeds as they transition from the freeway to a City street. With respect to lane widths, refer to response to **Comment 4-43**. Street would be reconstructed to include substantial bicycle and pedestrian amenities, such as a cycle path, shared use (bicycle and pedestrian) path, sidewalks, curb extensions (bump-outs) that would

shorten pedestrian crosswalk distance, and a median for pedestrian refuge. NYSDOT will work with the City and appropriate stakeholders during the final design phases to refine the design of the areas of Almond Street outside the curblines, including widths of the medians and pedestrian refuge areas, cycle track, shared use lanes, and sidewalks, etc. The refinements to Almond Street would be designed to be consistent with the City's vision and the needs and objectives of the Project.

C 9-317: Neighborhood residents are concerned that the location of the roundabout will increase traffic close to the school both on the 81 BL and on Dr. Martin Luther King East. Not only is there a danger to students walking near the school, but there is also well documented harm to students' health by placing a major roadway close to a school. We should be looking at all options to both increase the distance of the road and divert the number of cars away from the school. Residents of the neighborhood should be given several options of how and where to bring the highway to grade, and a collaborative process should follow to create a solution. This could include moving the roundabout further south to the Kennedy, Colvin, or Brighton interchanges. In addition, no matter the option, NYSDOT should build into the budget of the project further remediation for the STEAM at MLK school, including top-of-the-line HVAC systems and changes to the outdoor landscape to mitigate the effects of pollution from cars.

R 9-317: As stated in **Section 3.4.3**, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East. Instead, a roundabout would be located at Almond Street and Van Buren Street. NYSDOT considered moving the roundabout farther south to Colvin Street and Brighton Avenue, but the distance from these intersections to the 30-mph section a few hundred feet south of MLK, Jr. East was too far and would allow motorists to accelerate rather than maintaining reduced speeds. NYSDOT did not consider Oakwood Avenue as it currently does not connect with I-81. NYSDOT considered a roundabout at East Kennedy Street, which is south of MLK, Jr. East, but it would be very close to existing homes. Therefore, NYSDOT chose to locate the roundabout at Van Buren Street.

The alignment of the Community Grid Alternative is farther east than the existing highway. In addition, after the publication of the DDR/DEIS, the Community Grid Alternative was refined so that MLK, Jr. East would no longer connect to BL 81, reducing the number of vehicles passing the school. Lowering the segment of BL 81 farther south to create at grade, signalized intersections would further increase travel times to and from destinations to the south and divert additional traffic to the new I-81 (existing I-481).

As discussed in **Section 6-4-4** of the DDR/DEIS and FDR/FEIS, no adverse impacts to air quality at the Dr. King Elementary School were identified. During construction, as stated in **Chapter 4 (Table 4-7)**, **Section 6-2-3**, and **Section 6-4-4** of this FDR/FEIS, an outdoor ambient air quality monitoring program would be implemented would be overseen by NYSDOT. The program would consist of real-time particulate monitoring at a few locations within the local community, including locations within the environmental justice community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in

the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design.

- C 9-318: An old entrance to Oakwood Cemetery used to exist with a beautiful stone arch that entered into the cemetery. Inside the cemetery is architecture from JL Silsbee. This should be preserved and re-introduced to beautify the City and connect the cemetery with the residents who live directly west of it. Extend the Community Grid Alternative southward to again allow access to the main gate.
- R 9-318: The Community Grid Alternative includes a new northbound exit from BL 81 to Colvin Street, which would improve access to Oakwood Cemetery. Other changes in access to Oakwood Cemetery are beyond the scope of this Project and not under consideration at this time. However, implementation of the Project would not preclude others from making improvements to the grounds of the Oakwood Cemetery as part of an independent, future action.
- C 9-319: I support the creation of the land use working group as described in the DEIS. The land trust should be designed to best maximize democratic decision-making processes on land use and assisting people in owning their homes while preserving future affordability.
- R 9-319: Comment noted.
- C 9-320: The Project should employ local people during construction. The Project should implement the federal SEP-14 Local Hire program and should have a CWA-PLA agreement in place that includes unions and community representatives in decision-making for the Project.
- R 9-320: NYSDOT has submitted an application that if approved will create a local hiring preference for the I-81 Viaduct Project. The Department has appreciated the collaboration it has had with Urban Jobs Taskforce and others to create an application that will create an opportunity for the community to seek employment through the I-81 Viaduct project and will include an expansion of NYSDOT's On-the-Job Training program for the project to increase access for individuals to seek careers in heavy highway construction. This will help give greater opportunity for individuals living near the project and in the City of Syracuse to work directly on the project. In addition to the federal local hiring preference application, NYSDOT has partnered with NYSDOL to create Workforce Forward: Syracuse. This program and \$1 Million in State funding will seek to connect workers to training opportunities and to good-paying short-term and long-term infrastructure jobs in and around Syracuse. For those seeking to work on the many ancillary jobs that will be created by this project, Workforce Forward will help place, and train those individuals. The plan is to have NYSDOL in the local community connecting with people in the neighborhoods they live and help them find the employment or training they will need to be successful. NYSDOT also has the WorkSmart NY program in partnership with SUNY EOC which is helping give those who want to work in infrastructure construction the basic skills to work on any job site. NYSDOT has applied for federal grant funds through FHWA to expand the program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program will

grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship which is a program to help get more people involved in local trades unions. NYSDOT has recently secured federal STICC funds to create a new, interactive video program to introduce and encourage High School students to pursue careers in heavy highway construction. The plan is to work directly with the Syracuse City School District and its P-Tech program to show students the vast opportunities they have in the field of building infrastructure through first-person videos by students and individuals working on projects. The idea is to use the I-81 Viaduct Project as a catalyst to create video content that students can explore to learn more about fields of interest. NYSDOT wants to create a unique, meaningful program that would lead to opportunities for long-term employment on the Project. NYSDOT plans to monitor the local hiring metrics throughout the project and will conduct regular meetings with the WorkSmartNY Syracuse Build Collaborative to gauge the progress on hiring and where things need to be adjusted.

NYSDOT's establishment of the Land use Working group is an attempt to maximize a democratic decision-making process on land that becomes available as a result of the implementation of the Community Grid alternative. NYCLU will be one of the stakeholders engaged in the Land Use working Group to assist NYSDOT in the disposition of excess property not needed for transportation purposes.

NYSDOT is proposing to move the roundabout to Van Buren Street and sever the on and off ramps to MLK. Those attending Dr. King elementary school would maintain similar access west of the school.

- C 9-321: NYSDOT should pursue all available options to improve our mass transportation systems as part of this project. Particularly, funding for the Bus Rapid Transit system as laid out in the Syracuse Metropolitan Transportation Council's February 2018 SMART1 study should be pursued as a ready-to-implement idea that will contribute to the project's goals of building a balanced transportation system with many options for residents to get around the region. In addition to improving quality of life in the city overall, better mass transit options during the construction phase will help mitigate traffic impacts while allowing more local workers access to the job sites.
- R 9-321: A stated objective of the Project is to "maintain access to existing local bus service and enhance transit amenities within the Project limits in and near Downtown Syracuse." "Transit amenities" refers to bus stops and shelters, bus turnouts, and layover and turnaround places within the Project limits in and near Downtown Syracuse. As part of the development of the Viaduct and Community Grid Alternatives, NYSDOT will continue to coordinate with Centro on potential street improvements. In addition, NYSDOT considered the potential effects on public transit, pedestrians, and bicyclists for both build alternatives (see **Sections 6-2-2.3.1** and **6-2-2.4.1**). During construction, temporary park-and-ride locations would be provided as described in **Table 4-7**. Additional transit improvements are outside the scope of the Project. The Project would not preclude Centro or others from carrying out transit improvements in the future, as separate, independent actions.

- C 9-322: With such a large project, there is fear from many that the noise and environmental impacts of the construction will be difficult to live with for those closest to the viaduct. I urge NYSDOT to pro-actively set up a process and set aside funding to assist residents who would like to voluntarily temporarily relocate if the effects of construction disrupts their daily life or causes adverse health impacts. By setting up and communicating the process in advance and emphasizing that it is strictly voluntary and only a temporary measure, I believe you will help alleviate a lot of the anxiety and questions that residents living close to the viaduct currently have.
- R 9-322: A financial accommodation to residents who choose to temporarily relocate during construction is not under the authority of NYSDOT. NYSDOT will continue to proactively communicate with residents living close to the Project work areas about work schedule and activities.
- C 9-323: The project must contribute, wherever possible, to pedestrian and bicycle safety. The new I-81 configuration of the intersection where 5/92 currently crosses I-481 in DeWitt will include traffic lights rather than a simple cloverleaf. Please be aware that people do try to get across that span by means other than cars and do what you can to make it as safe as possible.
- R 9-323: The improvements in this area proposed by the Project are limited to spot improvements at the interchange and the Lyndon Corners intersection. Route 5/92 corridor improvements, including improvements to bicycle and pedestrian amenities and the Route 5/92 corridor, would not be precluded by the Project.
- C 9-324: I have carefully studied the estimated drive times and do believe that the new project, once completed, will not cause serious delays to drivers from Salina, Cicero, Lafayette, and Tully. I also believe it will improve access to Destiny Mall from the south. But I have also heard, as you have, the concerns of business owners at the northern and southern ends of the project. I urge NYSDOT to use signage along the new I-81 route to direct travelers to hotels, gas stations, restaurants, and other amenities within Salina, Cicero, Lafayette, and Tully, the same way this is done elsewhere on I-81 and other interstates.
- R 9-324: NYSDOT will investigate the ability to provide Tourist Oriented Direction (TOD) signing, as well as other types of signing for these facilities in final design.

9-19 NEIGHBORS OF THE ONONDAGA NATION

- C 9-325: Neighbors of Onondaga Nation is a grassroots organization of Central New Yorkers that recognizes and supports the sovereign rights of the traditional government of the Onondaga Nation. We agree with NYSDOT's current preferred option to remove the 1.4-mile stretch of the viaduct and replace it with a street-level grid. Removing the viaduct is a great first step toward racial justice. However, we need to continue to advocate for environmental, racial, and economic justice to ensure the fair and equitable treatment of community members who live in the shadow of the viaduct and ensure that Onondaga Nation Cultural Resource Monitors

are used whenever ground disturbance is expected, to ensure proper care of cultural resources and ancestral remains.

R 9-325: Comment noted. A Programmatic Agreement (PA), developed pursuant to 36 CFR §800.14(b)(1)(ii) and in consultation with the SHPO, the FHWA, the Advisory Council on Historic Preservation, the Onondaga Nation, and the NYSDOT includes stipulations allowing Native Nation Monitors, selected by the Onondaga Nation, to be present during the remaining archaeological survey work (machine-aided testing and archaeological monitoring during construction) and in additional areas where ground disturbance would occur within ¼-mile of waterbodies. For additional information, please refer to **Section 6.4.1, Appendix E-5, and Appendix E-6** of this FDR/FEIS.

C 9-326: NYSDOT must respect the rights and requests of the Onondaga Nation. The vast majority of the I-81 project area falls within the exclusive treaty-protected territory and the remainder lies within the Nation's traditional indigenous territory. Per our rights as stated in Articles 32 and 12 of the United Nations Declaration on the Rights of Indigenous Peoples, we request NYSDOT remain in full consultation with the Onondaga Nation and honor their reasonable requests regarding the I-81 project.

The Phase 1A and 1B Archeological Reports recognize that the potential exists in this project for the disturbance of Haudenosaunee archeological sites, and the Onondaga Nation has repeatedly requested that proper respect and protocols be used to ensure that ancestral remains are not disturbed in the construction of the project. We ask that FHWA, NYSDOT, and SHPO fully adopt the recommendations of the Onondaga Nation, including but not limited to:

- Hiring multiple Cultural Resource Monitors from and trained by the Onondaga Nation to be present at all ground disturbing activities.
- Using the proper terms to refer to the Onondaga Nation, its territory, and its people.
- To stop work and notify the Onondaga Nation promptly upon the discovery of any human remains. This practice ensures that, if the remains are Haudenosaunee, proper protocols are followed throughout the investigation process.

R 9-326: On June 16, 2014, NYSDOT, on behalf of FHWA, sent a letter to the Onondaga Nation initiating consultation under Section 106 of the National Historic Preservation Act. Since that time, the Onondaga Nation has participated in the Section 106 consultation for the Project. This consultation has included review and discussion of the development of the *Phase IA Archaeological Sensitivity Assessment* (September 2016) and *Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery* (October 2017) (Phase IB Work Plan), as well as the *Phase IB Archaeological Survey: Shovel Testing* (September 2020) with the Onondaga Nation and SHPO. Both documents were circulated to SHPO, FHWA, and the Onondaga Nation for review and comment. Comments received from the SHPO and the Onondaga Nation were considered and incorporated as appropriate.

As a result of this phased process for the identification of archaeological resources, the Project's effects on historic properties cannot be fully determined at this time. The final

identification and evaluation of historic properties will be deferred as provided for in a Programmatic Agreement (PA), developed pursuant to 36 CFR §800.14(b)(1)(ii). The PA was developed in consultation with the SHPO, the FHWA, the Advisory Council on Historic Preservation, the Onondaga Nation, and the NYSDOT and stipulates procedures to ensure that archaeological investigations are completed in accordance with the approved Phase IB Work Plan. The PA also outlines procedures for consultation among FHWA, SHPO, the Onondaga Nation, the Tuscarora Nation, and NYSDOT through the completion of archaeological investigations as well as to avoid, minimize, or mitigate any adverse effects on archaeological properties. Additionally, the PA includes stipulations allowing Native Nation Monitors, selected by the Onondaga Nation, to be present during the remaining archaeological survey work (machine-aided testing and archaeological monitoring during construction) and in additional areas where ground disturbance would occur within ¼-mile of waterbodies. It also stipulates procedures and protocols agreed upon if evidence of burials or human remains is encountered during construction.

For additional information, please refer to **Section 6.4.1**, **Appendix E-5**, and **Appendix E-6** of this FDR/FEIS.

- C 9-327: The final EIS and I-81 project must address air pollution and greenhouse gas emissions and should be designed to accommodate lower-emissions and no-emissions transportation option such as walking, biking, public transportation, and electric vehicles of every kind. The project should also be designed to encourage planning that emphasizes walkable communities and reduces the need for personal vehicles. Transportation contributes to over one-third of New York's greenhouse gas emissions and emissions from the transportation sector also contribute to many air quality and health harms. As a state agency, the NYSDOT is required by Section 7 of the Climate Leadership and Community Protection Act to ensure that its decisions align with the emissions limits set by the CLCPA and shall not disproportionately harm disadvantaged communities.
- R 9-327: As documented in **Section 6-4-4** and **Section 6-4-5** of the DDR/DEIS and FDR/FEIS, the NYSDOT assessed the potential effects to air quality and greenhouse gas emissions resulting from implementation of the Project. Both the Viaduct Alternative and Community Grid Alternative would result in lower regional criteria pollutant and greenhouse gas emissions, as compared to the No Build Alternative. Consistent with the objectives established for the Project (see **Chapter 1** of the DDR/DEIS and FDR/FEIS), both build alternatives include new bicycle and pedestrian facilities and improvements to existing facilities, as documented in **Chapter 3 Alternatives**. Streets would be designed in compliance with New York complete streets requirements. NYSDOT has and will continue to coordinate with Centro on potential street improvements (transit amenities, such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro's transit initiatives. **Section 6-4-5.1** of this FDR/FEIS has been revised to include discussion of the Climate Leadership and Community Protection Act. As documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, neither build alternative would result in disproportionately high and adverse effects to low-income and/or minority (environmental justice) communities.

- C 9-328: We also support the comments submitted by the New York Civil Liberties Union and its recommendations as expressed in this document concerning protection of school children, land use, and health and wealth, and promotion of access to opportunity.
- R 9-328: See **Section 9-13** of this appendix for responses to comments from the New York Civil Liberties Union.

9-20 ALLIANCE FOR A GREEN ECONOMY

- C 9-329: Alliance for a Green Economy agrees with NYSDOT's current preferred option to remove the 1.4-mile stretch of the viaduct and replace it with a street-level grid. From an environmental and health perspective, as it stands today, I-81 contributes to a landscape built around racial discrimination, prioritization of private vehicles, and sprawl, and represents a corridor of greenhouse gas emissions, air pollution, and the transportation of radioactive waste from US and Canadian nuclear facilities. Removing the viaduct is a great first step toward racial justice and toward smarter planning. However, we need to continue to advocate for environmental, racial, and economic justice to ensure the fair and equitable treatment of community members who live along I-81. The NYSDOT also needs to honor the requests of the Onondaga Nation, ensuring free, prior, and informed consent for this project located on their lands.
- R 9-329: **Section 6-2-3** of the DDR/DEIS and FDR/FEIS documents the assessment of effects of the Project on environmental justice populations. As stated, the Community Grid Alternative would benefit community cohesion since the existing I-81 viaduct, a perceived barrier, would be removed from the railway bridge near Renwick Avenue to I-690. The Community Grid Alternative would address deficiencies in the vehicular, pedestrian and bicycle network and enhance connectivity. The removal of highway infrastructure and reduction in the transportation footprint, along with related transportation and urban design improvements, would help reconnect neighborhoods on both sides of the existing I-81 and I-690.

The Project is located outside of the Onondaga Nation Reservation. However, as part of the Section 106 of the National Historic Preservation Act process, FHWA and NYSDOT have coordinated with the Onondaga Nation regarding the potential for discovery of archaeological artifacts during project construction and would continue to do so during the construction phase, as outlined in the Section 106 Programmatic Agreement developed among NYSDOT, FHWA, the Onondaga Nation, and others (see **Appendix E-6**, Section 106 Programmatic Agreement). For additional information regarding NYSDOT's coordination with the Onondaga Nation, see **Section 6-4-1** of this FDR/FEIS.

- C 9-330: State and federal agencies must fully consult with the Onondaga Nation and honor their requests with regard to the I-81 project. The Phase 1A and 1B Archeological Reports recognize that the potential exists in this project for the disturbance of Haudenosaunee archeological sites, and the Onondaga Nation repeatedly requested in the official correspondence included in this EIS that proper respect and protocols be used to ensure that ancestral remains are not disturbed in the construction of the project. We ask that FHWA,

NYSDOT, and SHPO fully adopt the recommendations of the Onondaga Nation, including but not limited to:

- Hiring multiple Cultural Resource Monitors from and trained by the Onondaga Nation to be present at all ground disturbing activities
- Using the proper terms to refer to the Onondaga Nation, its territory, and its people.
- To stop work and notify the Onondaga Nation promptly upon the discovery of any human remains. This practice ensures that, if the remains are Haudenosaunee, proper protocols are followed throughout the investigation process.

R 9-330: On June 16, 2014, NYSDOT, on behalf of FHWA, sent a letter to the Onondaga Nation initiating consultation under Section 106 of the National Historic Preservation Act. Since that time, the Onondaga Nation has participated in the Section 106 consultation for the Project. This consultation has included review and discussion of the development of the *Phase IA Archaeological Sensitivity Assessment* (September 2016) and *Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery* (October 2017) (Phase IB Work Plan), as well as the *Phase IB Archaeological Survey: Shovel Testing* (September 2020) with the Onondaga Nation and SHPO. Both documents were circulated to SHPO, FHWA, and the Onondaga Nation for review and comment. Comments received from the SHPO and the Onondaga Nation were considered and incorporated as appropriate.

As a result of this phased process for archaeological resources, the Project's effects on historic properties cannot be fully determined at this time. The final identification and evaluation of historic properties will be deferred as provided for in a Programmatic Agreement (PA), developed pursuant to 36 CFR §800.14(b)(1)(ii). The PA was developed in consultation with the SHPO, the FHWA, the Advisory Council on Historic Preservation, the Onondaga Nation, and the NYSDOT and stipulates procedures to ensure that archaeological investigations are completed in accordance with the approved Phase IB Work Plan. The PA also outlines procedures for consultation among FHWA, SHPO, the Onondaga Nation, the Tuscarora Nation, and NYSDOT through the completion of archaeological investigations as well as to avoid, minimize, or mitigate any adverse effects on archaeological properties. Additionally, the PA includes stipulations allowing Native Nation Monitors, selected by the Onondaga Nation, to be present during the remaining archaeological survey work (machine-aided testing and archaeological monitoring during construction) and in additional areas within ¼-mile of waterbodies. It also stipulates procedures and protocols agreed upon if evidence of burials or human remains is encountered during construction.

For additional information, please refer to **Section 6.4.1, Appendix E-5, and Appendix E-6** of this FDR/FEIS.

C 9-331: The FEIS must address air pollution and greenhouse gas emissions and should be designed to accommodate lower-emissions and no-emissions transportation option such as walking, biking, public transportation, and electric vehicles of every kind. The project should also be designed to encourage planning that emphasizes walkable communities and reduces the need for personal vehicles. NYSDOT is required by Section 7 of the Climate Leadership and

Community Protection Act to ensure that its decisions align with the emissions limits set by the CLCPA and shall not disproportionately harm disadvantaged communities.

- R 9-331: As documented in **Section 6-4-4** and **Section 6-4-5** of the DDR/DEIS and FDR/FEIS, the NYSDOT assessed the potential effects to air quality and greenhouse gas emissions resulting from implementation of the Project. Both the Viaduct Alternative and Community Grid Alternative would result in lower regional criteria pollutant and greenhouse gas emissions, as compared to the No Build Alternative. Consistent with the objectives established for the Project (see **Chapter 1** of the DDR/DEIS and FDR/FEIS), both build alternatives include new bicycle and pedestrian facilities and improvements to existing facilities, as documented in **Chapter 3 Alternatives**. Streets would be designed in compliance with New York complete streets requirements. NYSDOT has and will continue to coordinate with Centro on potential street improvements (transit amenities, such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro's transit initiatives. **Section 6-4-5.1** of this FDR/FEIS has been revised to include discussion of the Climate Leadership and Community Protection Act. As documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, neither build alternative would result in disproportionately high and adverse effects to low-income and/or minority (environmental justice) communities.
- C 9-332: The FEIS must address the current and potential shipments of highly radioactive nuclear waste from U.S. and Canadian nuclear facilities, as these kinds of shipments could have major health and safety impacts on our region. NYSDOT should strive to design the I-81 project in ways that avoid the transportation of nuclear waste through our region or that, at the very least, mitigate the potential impacts of transporting this waste. Most important, the Onondaga Nation and other communities must be consulted about any proposed shipments through their lands.
- R 9-332: Addressing shipments of highly radioactive waste is outside the scope of this Project. However, there are various NYSDOT regulations that pertain to the hauling of nuclear waste. Before specific types of nuclear waste enter New York State, a Level VI inspection is required, followed by a police escort through the state. Additional requirements and permits are specific to the type of packaging and type of waste being transported.
- C 9-333: We support the comments submitted by the New York Civil Liberties Union as expressed in this document and urge NYSDOT to consider its recommendations regarding the protection of school children, land use, and health and wealth, and promoting access to opportunity.
- R 9-333: See **Section 9-13** of this appendix for responses to comments from the New York Civil Liberties Union.

9-21 URBAN JOBS TASK FORCE

- C 9-334: The Urban Jobs Task Force (UJTF) and 2,369 signatories present these petitions in support of local hire on I-81 as comments on the DEIS (please see **Appendix M-6** for the pdf containing the petitions and signatories):

Syracuse Residents Demand CWA-PLA for Jobs on I-81 Viaduct Project:

We, the undersigned, call upon the NYS Department of Transportation and the Central New York Trade Unions to negotiate at a Big Table for employment equity we want strong, enforceable Community Workforce Agreement language on any Project Labor Agreement for the I-81 Viaduct Project.

Community Workforce provisions are fair for EVERYONE. A CWA-PLA will get everyone working, including Syracuse residents.

A CWA-PLA is what justice and racial equity look like on the I-81 Viaduct Project.

and

Syracuse Residents Demand Jobs on the I-81 Viaduct Project

We, the undersigned, believe that city residents deserve equal opportunity to work on public works project, especially those that affect their lives. The billion-dollar, publicly-funded I-81 Viaduct Project will significantly impact many struggling Syracuse neighborhoods, particularly those of color. It is only fair that capable and willing city residents from these neighborhoods benefit from the high-paying I-81 jobs coming to their city.

We, the undersigned, are concerned that the I-81 Viaduct Project will be a Project Labor Agreement (PLA) where union members will fill most of the jobs. The data for the current I-690 Teall Interchange Project, which is a PLA, shows that most of the workers are white and male; only 10% are minority and 6% women. We believe that this data reflects the membership of the local trade unions making it close to impossible for non-union members to work on the project.

Therefore,

We, the undersigned, demand that the New York State Department of Transportation deny the trade unions any Project Labor Agreement (PLA) for the I-81 Viaduct Project unless the trade unions create an effective recruitment and retention system that is inclusive of city residents.

- R 9-334: Please see response to **Comment 9-336**.

- C 9-335: We are delighted to see the shift in your attitude towards prioritizing local hire on the I-81 Viaduct project, as demonstrated by your willingness to create the SEP-14 application for the project in partnership with us, the City of Syracuse, and Legal Services of Central New York (LSCNY) by extension of your participation in the I-81 Big Table, inspired by recommendations

from UJTF and LSCNY's Racial Equity Impact Statement. We also appreciate your preferred option of the community grid. We are in support of this option, despite its flaws.

We have concerns regarding equity issues in relation to the demolition and construction of a 1.4-mile raised viaduct portion of I-81, which the NYCLU has rightly declared a civil rights and racial justice issue and an opportunity for equitable development. The upcoming I-81 Viaduct project will bring thousands of good-paying jobs to the City of Syracuse. In anticipation of this influx of lucrative careers, UJTF in collaboration with LSCNY created the first-ever Racial Equity Impact Statement (REIS) on the construction trade industry in Onondaga County. The report found that not only racial, but also geographical disparities were deeply rooted in the construction trades: REIS project data shows that 87 percent of workers on the public projects examined in Syracuse were white; however, Syracuse's white population is only 49 percent. Equally troubling, over 90 percent of construction workers resided outside the City of Syracuse. This means that if the I-81 Viaduct project were to start tomorrow, very few Syracuse residents would be able to work on it and we are the 8th poorest City in the nation. These inequities are a direct result of generations of historic exclusion of black and brown people in the lucrative field of construction trades, and the segregation caused during the 1950s to 70s by federal infrastructure projects like the I-81 Viaduct.

R 9-335: Please see response to **Comment 9-336**.

C 9-336: Failing to frame infrastructure projects through an equity lens can result in severe adverse outcomes especially for marginalized groups and we can no longer focus solely on crunching numbers around traffic safety, flow, and delays. Our hope is that this project will become a model for the nation on best practices and embody economic, environmental, and educational restoration for this community. To achieve this, it requires intentional and thoughtful actions by NYSDOT and FHWA with guidance and legislation on the Federal level. Please see below UJTF recommendations for amendment to the current DEIS plan on behalf of our 18 member organizations and membership of several hundred:

- To ensure that a fair percentage of I-81 jobs go to Syracuse residents we recommend (1) a pro-Syracuse version of the federal government's Sep-14 Local Hire Program, including an overall goal of 15 percent local hire from within the City and the two disadvantaged county zip codes (Solvay and East Syracuse); (2) A Community Workforce Agreement-Project Labor Agreement (CWA-PLA), which is a legally binding labor agreement between unions and the community that solidifies targeted hiring provisions designed to get marginalized workers into construction careers; and (3) an independent monitoring entity to provide public transparency on I-81 workforce outcomes and recommend corrective measures where necessary and/or possible to meet set CWA-PLA and/or SEP-14 pilot program goals.
- Following the lead of the NYCLU, we are asking that "surplus" acres of land previously adjacent to the viaduct not be developed in a way that will gentrify the community. Rather it should foster Black inclusion, community ownership, and have built-in anti-displacement measures. Federal and state officials must reserve eight (8) acres of land to be placed

into a community land trust that will allow current residents the opportunity to build equity and remain in their community.

- NYSDOT must move the on/off ramp to at least 600 feet away from STEAM at Dr. King elementary school at which 87 percent of the enrolled students are Black and 12 percent are Mixed Race or Hispanic. Despite the school being steps away from the current viaduct, the NYSDOT community gid proposal places an on-and-off ramp less than 250 feet from the school. This proposal goes against decades-long recommendations by USEPA and CDC that recommend placing major roadways at least 500–600 feet away from schools.

Please, do the right thing. Our community's vitality is depending on it, as we do not believe marginalized communities, especially black ones, can endure another systemic blow, which this has the potential to be depending on your actions. Thank you for reading and we look forward to continued partnership as the project develops.

R 9-336: In August 2021, NYSDOT began coordinating with local stakeholders, including the City of Syracuse, Urban Jobs Task Force, and Legal Services of CNY to establish a local hiring preference on the I-81 Viaduct Project. Topics of discussion at the local stakeholder meetings included available workforce, similar requirements on City of Syracuse projects, incentives to contractors, and a framework for providing employment opportunities to residents most affected by the current viaduct and the I-81 Viaduct Project. Meeting participants identified the need for an incentive-based hiring program that would encourage contractors on the Project to hire residents in some of the City of Syracuse's most disadvantaged neighborhoods. NYSDOT submitted an application for local hiring preference to FHWA for review in December 2021, which was approved in March 2022. The program will create a local hiring preference for the I-81 Viaduct Project, including an expansion of NYSDOT's On-the-Job Training program for the Project to increase access for individuals to seek careers in heavy highway construction. This would help give greater opportunity for individuals living near the Project and in the City of Syracuse to work directly on the Project.

NYSDOT has partnered with New York State Department of Labor (NYSDOL) to create Workforce Forward: Syracuse. This program and \$1 million in State funding would seek to connect workers to training opportunities and to short-term and long-term infrastructure jobs in and around Syracuse. Workforce Forward would help place and train individuals seeking to work on the many ancillary jobs that would be created by the Project. The plan is to have NYSDOL in the local community connecting with people in the neighborhoods they live in and help them find the employment or training they would need to be successful.

NYSDOT also has established the WorkSmart NY program in partnership with the Syracuse Educational Opportunity Center, an affiliate of SUNY Morrisville Community College (SUNY EOC). This program is helping give those who want to work in infrastructure construction the basic skills to work on any job site. Through the WorkSmart NY program, NYSDOT will coordinate with existing community action agencies and initiatives such as CenterState CEO; Syracuse Build, led by the City of Syracuse; educational institutions; trade and industry representatives; and other key partners to create the WorkSmartNY Syracuse Build Collaborative (the Collaborative) for the FHWA Highway Construction Worker Partnership (HCWP) grant. The region's workforce development board, CNY Works, Inc., has participated

in the planning and organization of this grant and a statement of commitment has been requested.

FHWA's HWCP grant provides funding to states to expand workforce development opportunities in local communities and increase the number of construction workers in the highway construction field through recruitment, assistance, training, and placement. The Collaborative believes that a successful program requires more than teaching an individual trade skills; it must provide supportive programs and services throughout the trainee/apprenticeship duration. The Collaborative has a long and successful track record of working with other agencies in underserved communities to secure funding for construction skills training, recruitment, and placement, and spearheading workforce development advocacy efforts. NYSDOT will leverage those skills, expertise, and resources to bring the partnership full circle by engaging local labor unions and industry representatives to provide actual employment opportunities to trained individuals.

NYSDOT has applied for additional HWCP grant funds to expand the WorkSmart NY program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program would grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship, a program to help get more people involved in local trades unions.

NYSDOT has recently secured Statewide Transportation Information and Coordination Center (STICC) funds to create a new, interactive video program to introduce and encourage high school students to pursue careers in heavy highway construction. The plan is to work directly with the Syracuse City School District and its P-Tech program to show students the opportunities they have in the building infrastructure field through first-person videos by students and individuals working on projects and to use the Project as a catalyst to create video content that students can explore to learn more about fields of interest. NYSDOT plans to monitor the local hiring metrics throughout the Project and would conduct regular meetings with the WorkSmart NY Syracuse Build Collaborative to gauge the progress on hiring and where things need to be adjusted.

NYSDOT's establishment of the Land Use Working Group is an attempt to maximize a democratic decision-making process on land that becomes available as a result of the implementation of the Community Grid alternative. NYCLU will be one of the stakeholders engaged in the Land Use working Group to assist NYSDOT in the disposition of excess property not needed for transportation purposes.

As stated in **Section 3.4.3**, based on public input, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East under the Community Grid Alternative. Instead, NYSDOT is proposing a roundabout at BL 81 and Van Buren Street.

9-22 NYCLU POSTCARDS

NYSDOT and FHWA received over 2,000 postcards distributed to local residents by the NYCLU. The postcards contain a choice of topics that people could select, which reflect many of the major themes in NYCLU's comment letter. Concerns related to displacement of

residents, construction impacts to residents, potential impacts to Dr. King Elementary School, potential impacts to Wilson Park, and availability of construction jobs to local residents. Please refer to responses to comments from NYCLU (**Section 9-13**) and responses to comments in **Section 7** of this appendix.

9-23 PYRAMID MANAGEMENT GROUP AND DESTINY USA

- C 9-337: The proposed action is of the utmost importance to Destiny (and to all of Central New York) in that it represents the first time the federal government would support the decommissioning of an essential, two-digit portion of the Eisenhower Interstate System without simultaneously providing adequate highway capacity to handle existing and future traffic and interstate commerce. Destiny's decade-long attempts to coordinate with NYSDOT about the future of the aging I-81 viaduct have been in vain. The DEIS attempts to support the agency's preferred alternative – to remove the I-81 viaduct in favor of a "Community Grid." The DEIS ignores many of the key concerns Destiny and many others have raised consistently, and as a result, has failed to meet even the most basic requirements of NEPA. NYSDOT should commit to the preparation of a supplemental DEIS under NEPA's regulations that will take a hard look at all reasonable alternatives, and fairly responds to the concerns of the entire Syracuse area community.

Publication of the DEIS for the project marks the next step of a flawed environmental review process aimed only at supporting NYSDOT's predetermined desired outcome which they have been advancing for more than a decade. Contrary to the mandates of NEPA, NYSDOT has failed to: (1) consider a reasonable range of alternatives, (2) accurately analyze whether the preferred alternative would meet the project's objectives including improving mobility and traffic management, reducing vehicle miles traveled and greenhouse gas emissions, and reconnecting communities, (3) fairly assess how its preferred alternative would adversely impact the very communities it is purportedly aimed to benefit, (4) even recognize, let alone review accurately, how its preferred alternative would impact Syracuse's industries and economy, (5) truly listen to and recognize the concerns of many local citizens who worry that the preferred alternative will simply repeat mistakes of the past, allegedly in the name of fairness and equity, and (6) honestly evaluate the degradation of the environment in terms of increased fossil fuel consumption and increased tailpipe emissions that would result from the preferred alternative.

Procedurally and substantively, the DEIS represents a classic case of "arbitrary, capricious, and an abuse of discretion" agency action. For the better part of a decade, NYSDOT has single-mindedly pursued the so-called "Community Boulevard and Grid" alternative, which would tear down almost a mile and a half of the existing I-81 Viaduct through downtown Syracuse. That alternative, however, would be better labeled the "481 Bypass Alternative" because the only way traffic could be managed following the demolition of a key portion of the Eisenhower Interstate system would be to invest nearly \$1 billion in upgrading and expanding a high-speed bypass to direct cars and trucks around the city, even though NYSDOT's own data demonstrate that 94 percent of the traffic is local.

- R 9-337: NYSDOT and FHWA prepared the Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) and this Final Design Report/Final Environmental Impact Statement (FDR/FEIS) in accordance with the requirements of the Council on Environmental Quality's regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA) (40 CFR §1500-1508), the FHWA's Environmental Impact and Related Procedures: Final Rule (23 CFR §771 and §774), the NYSDOT Procedures for Implementation of the State Environmental Quality Review Act (17 NYCRR Part 15), and the NYSDOT Project Development Manual.
- C 9-338: The 481 Bypass/Community Grid alternative would build massive interchanges to the north and south of the city, expand lanes, and make other engineering improvements to the existing I-481, all in the hope that area residents, travelers, and truckers will willingly go 15 miles out of their way to avoid a traffic-clogged "grid" through downtown Syracuse. This will not happen. Worst of all, instead of an elevated highway, NYSDOT would bestow on the community an "at-grade arterial," which is in reality a street-level highway through the heart of Syracuse's Southside neighborhoods and downtown Syracuse, mistakenly claiming such an option would be "pedestrian and bicycle friendly."
- R 9-338: See responses to **Comments 9-347 through 9-356** with respect to the traffic analysis.
- C 9-339: FHWA, as the lead federal agency with ultimate responsibility for approving any NEPA analysis by a state department of transportation and issuing a final decision selecting an alternative for the proposed action, should reject this flawed process. FHWA should demand that NYSDOT prepare a supplemental NEPA review that takes a fair look at all reasonable alternatives, actually responds to the concerns of the entire Syracuse area community, and corrects the fundamental flaws present in the current DEIS.

NYSDOT's DEIS violates NEPA's most basic premise – an agency should analyze a "reasonable range" of alternatives and keep an open mind as to solutions to the transportation and related issues posed by the proposed action. They have instead prematurely identified a preferred alternative that is contrary to Biden administration transportation and environmental policies, promotes suburban sprawl, and exacerbates traffic and air pollution in the very communities the action is supposed to benefit.

To meet its unreasonably predetermined outcome, NYSDOT has performed a series of technical analyses modeling traffic and economic impacts that have either willfully manipulated or negligently ignored basic facts and common sense. NYSDOT is relying on outdated 2013 data that they started analyzing over five years ago. NYSDOT makes unsupported assumptions about lack of future traffic growth, about how long-established businesses along I-81 would function absent direct highway access, about how truck traffic along the crucial I-81 corridor is conducted, about how a newly built, 3.8 million square feet Amazon distribution facility employing 1,500 people and opening winter 2022 would alter the already flawed traffic analysis, about how local intersections beyond the extremely narrow DEIS study area will be impacted by removing and not replacing the I-81 Viaduct, and about how the preferred alternative would "connect" existing communities. NYSDOT has also failed

to examine the adverse economic impacts that the Community Grid would cause. These errors demonstrate that NYSDOT has failed to take the “hard look” at all environmental and socio-economic impacts, as mandated by NEPA and its implementing regulations.

- R 9-339: NYSDOT and FHWA conducted an evaluation of a reasonable range of alternatives in accordance with NEPA. The DDR/DEIS and FDR/FEIS include a comprehensive assessment of potential social, economic, and environmental impacts. All analyses were conducted in accordance with adopted NYSDOT procedures and FHWA procedures and guidance, including NYSDOT’s The Environmental Manual (TEM). Therefore, a Supplemental EIS is not needed.
- C 9-340: Stakeholders from Syracuse have proposed reasonable options to NYSDOT which would both preserve the crucial safe route along I-81 and promote the “community connectivity” supposedly at the heart of NYSDOT’s preferred alternative. As an example, a combination of the Grid with the proposed Harriet Tubman Memorial Freedom Bridge would take none of the nearly billion dollars needed to build the 481 Bypass/Community Grid alternative and actually devote those funds in the city to facilitate a truly connected community. Under the Grid and Harriet Tubman Memorial Freedom Bridge, residents and visitors would have viable and safe east-west access, connecting existing academic and health centers with the downtown area, rather than a congested four-lane street-level highway with 13 signalized intersections proposed under the 481 Bypass/Community Grid. Rather than imposing a “roundabout” with heavy traffic immediately adjacent to an elementary school or in the midst of a southside neighborhood, the Grid and Harriet Tubman Memorial Freedom Bridge would provide enhanced community mobility and safety. Rather than building an over-engineered viaduct as described in the DEIS, the community could achieve a landmark piece of infrastructure that would replace the existing I-81 elevated highway with a bridge that could unite Syracuse and surrounding areas. And, rather than devoting funds to a highway bypass that would increase suburban sprawl, negative air impacts, wasted fuel, and frustrate global warming initiatives, the state could direct needed funds to assist the communities that had been displaced by the construction of the I-81 Viaduct over 50 years ago. Yet, to date, NYSDOT has shown no interest in a fair and open discussion of such a promising alternative.
- R 9-340: See response to **Comment 9-242** with respect to the proposed skyway concept (Harriet Tubman Memorial Freedom Bridge). In addition, as stated in **Section 3.4.3**, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East.
- C 9-341: Over 50 years ago, in the name of progress and mobility, federal and state leaders made an error. A community was separated and minority citizens were displaced from their homes and businesses. In the name of correcting misdeeds of the past, NYSDOT should not make another serious mistake. Simply tearing down a symbol of those past decisions, a functioning highway, will not solve 21st century problems. We urge FHWA to listen to the citizens of Syracuse and Onondaga County who have learned from the past and believe there is a better way to a more equitable and unified future for the region.

R 9-341: Comment noted.

C 9-342: In 1999, after years of successful operation as the Carousel Center, Pyramid announced plans to make the property into an international attraction with an expanded footprint – Destiny USA, which opened in 2012. The Destiny project was supported by the Syracuse Common Council and Onondaga County Legislature and facilitated by the Syracuse Industrial Development Agency and was largely designed to support the 77.5 percent of leisure travelers arriving in the area each year by car. Under the Master PILOT Agreement, the City and Syracuse Industrial Development Agency were (and are) to take such actions that Pyramid, "...may reasonably require to enhance the ability of Carousel Center, Expansion Owner, or other such Obligor to design, finance, construct, equip, maintain and operate the Project Facility as a major regional tourist attraction.

Destiny's location was selected, and major investments of more than \$1.5 billion made, largely due to the location at the crossroads of I-81 and I-90 and is largely dependent on vehicular traffic with 136 million people living within a 750-mile radius of Syracuse, including over 50 percent of the population of Canada and the United States. Further, while many of its customers come from a wide trade area to utilize the various shopping, dining and entertainment services, many local shoppers also frequent Destiny. The DEIS severely understates the dramatic impact a change in vehicular traffic patterns could have on Destiny and, in turn, on Syracuse's local economy. Destiny remains gravely concerned about what implementation of NYSDOT's preferred alternative could mean not only for the shopping center itself, but also for Destiny's employees and the Central New York economy.

A group of local residents and businesses have actively monitored NYSDOT's environmental review process and first obtained a copy of a draft DEIS in 2016 by FOIL request. Based on coordination with a variety of consultants with background in the key areas of traffic and economic impact analyses, Pyramid believes that there are countless flaws in NYSDOT's DEIS that have existed since 2016 and which have continuously been brought to NYSDOT's attention but largely ignored. In order to reach a fair and rational decision on how best to manage the crucial I-81 corridor through Central New York, NYSDOT and FHWA must review these full range of issues and consider revised options that better serve the regional community's transportation needs.

R 9-342: The DDR/DEIS and FDR/FEIS have been prepared in accordance with NEPA regulations and document the assessment of potential social, economic, and environmental effects of the Project. Comments received throughout the NEPA process have been considered and addressed and responded to, as appropriate.

C 9-343: NYSDOT has failed to consider a reasonable range of alternatives. NEPA requires an agency to analyze a "reasonable range" of alternatives and keep an open mind as to solutions. Indeed, the Council on Environmental Quality ("CEQ") calls the alternatives analysis the "heart of the EIS." This regulatory mandate means that an agency must "rigorously explore and objectively evaluate" all reasonable alternatives. However, based on the current record, it is readily apparent that NYSDOT has done neither, and to the contrary has approached this DEIS with

a preferred option pre-selected and has been touting this preferred option long before the DEIS was released. In fact, in May 2019, NYSDOT released a Preliminary Draft Environmental Impact Statement (“pDEIS”) – an unprecedented action taken without review by or the approval of FHWA as the lead federal agency – that prematurely identified the 481 Bypass/Community Grid as the preferred alternative. NYSDOT published this document online (it could not be officially published in the Federal Register or be subject to formal public participation absent FHWA approval) and then conducted a propaganda tour ostensibly designed to get public input but in reality focused on drumming up support for its preferred alternative outside the boundaries of the regular NEPA process.

- R 9-343: NYSDOT and FHWA conducted a robust alternatives screening process to evaluate a reasonable range of alternatives for the I-81 Viaduct Project, as detailed in **Chapter 3, Alternatives** and **Appendix B-1** of the DDR/DEIS and FDR/FEIS. Potential alternatives that were evaluated included tunnel alternatives, depressed highway alternatives, viaduct replacement alternatives, street-level alternatives, and new alignment alternatives. Project alternatives were presented to the public throughout the NEPA scoping process, beginning with a *Scoping Initiation Packet* in November 2013, the scoping reports published in 2014 and 2015, and throughout the EIS process, including the preliminary DDR/DEIS that was published in April 2019. The preliminary DDR/DEIS was an informational document issued to bring the public up to date on the Project. It stated, “Based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the project alternatives; and national, state, and local environmental protection goals, the Community Grid Alternative would be selected as the preferred alternative.” Both the build alternatives were presented in the preliminary DEIS and the subsequent public meetings. After carefully considering and weighing the potential impacts of the Project Alternatives, and considering public input through several formal NEPA public review periods and at multiple public meetings, NYSDOT and FHWA then identified the Community Grid Alternative as the preferred alternative in the DDR/DEIS that was published in July 2021.
- C 9-344: NYSDOT has demonstrated its bias in favor of the 481 Bypass/Community Grid from day one. However, the 481 Bypass/Community Grid does not meet many of NYSDOT’s stated goals in the DEIS. The 481 Bypass/Community Grid fails to: (i) address the transportation network structural deficiencies, particularly associated with aging bridge structures and non-standard/non-conforming design features with the project limits along I-81 and I-690; and (ii) maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., business districts, hospitals, and institutions) within neighborhoods. Rather, NYSDOT’s preferred action prioritizes non-vehicular mobility, ostensibly to the benefit of pedestrians and bicyclists, by building a four-lane at-grade highway through an urban community.
- R 9-344: The DDR/DEIS and FDR/FEIS present a fair and equitable evaluation of the No Build, Viaduct, and Community Grid Alternatives (refer to **Chapter 6** of the DDR/DEIS and FDR/FEIS for an assessment of the potential social, economic, and environmental impacts of the alternatives). The Community Grid Alternative does meet each of the Project’s needs and objectives. With

respect to the objective to “address the transportation network structural deficiencies, particularly associated with aging bridge structures and non-standard/non-conforming design features within the project limits along I-81 and I-690,” the Community Grid Alternative would either remove bridge structures with structural deficiencies or repair or replace bridge structures that remain. With respect to the Project objective to “maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., business districts, hospitals, and institutions) within neighborhoods within and near Downtown Syracuse,” the Community Grid Alternative would maintain or enhance vehicle access to these locations.

- C 9-345: Other build alternatives have not received rigorous, fair, and objective consideration based on NYSDOT’s predetermined outcome. Options such as a covered highway or a variety of hybrid tunnel/street grid solutions, were rejected before giving them a full review in the DEIS on the purely unsupported conclusion that these alternatives were too expensive. For example, NYSDOT only preliminarily considered but then quickly rejected a viaduct long-term rehabilitation program, a stacked viaduct, several tunnel alternatives with grids on top, depressed highway (i.e., open trench) alternatives, and a western bypass alternative.

Each of the aforementioned alternatives was rejected on an arbitrary basis. A “reasonable” cost was established as “less than 2.5 times the estimated cost of Alternative V-1 (Rehabilitation),” which was estimated in 2018 as \$940 million. No rationale was provided for this number or the selection of the 2.5 times multiplier. Certain tunnel alternatives were rejected because the number of properties that would have to be acquired was deemed unreasonable. However, number of buildings is an arbitrary measure. Acquisition of 50 small buildings has the potential for the same land use impacts as 10 larger buildings. Other options were rejected due to “community disruptions” including, “...impacts to vehicular, pedestrian, and bicycle traffic.” Yet NYSDOT has ultimately advanced as its preferred alternative one that would have these same and/or greater detrimental impacts by bringing thousands of cars and trucks to the street level.

- R 9-345: NYSDOT and FHWA conducted a robust alternatives screening process that considered multiple screening criteria. Cost was only one criterion. Potential alternatives were also not recommended for further study due to their inability to meet the Project objectives, engineering and constructability challenges, or extent of building acquisitions. The alternatives screening process is described fully in **Chapter 3, Alternatives** of the DDR/DEIS and FDR/FEIS, as well as **Appendix B-1**.

- C 9-346: NYSDOT has publicly discounted and prematurely dismissed without analysis the Grid and Harriet Tubman Memorial Freedom Bridge advocated by a wide variety of community stakeholders. Community residents, elected officials and business representatives have recommended this plan specifically to meet NYSDOT’s stated project Purpose and Need. This option is viable and deserves a full analysis and airing through the NEPA process. Specifically, the Grid and Harriet Tubman Memorial Freedom Bridge (i) would not be larger than the existing viaduct, it would actually be narrower; (ii) could be designed with a 45 mph speed limit, unlike the 60 mph limit utilized to analyze this alternative in the DEIS; and (iii) would be

affordable; this proposal would not require almost \$1 billion to widen I-481 in the suburbs and improved I-690; those funds currently slated to reinforce I-481 through the Syracuse suburbs could be used for the Grid and Harriet Tubman Memorial Freedom Bridge and for the benefit of community concerns associated with increasing mobility in and around downtown.

It is estimated the aforementioned plan would prevent at least 36,900 cars on a daily basis from flooding neighborhood streets. Additionally, a dangerous proposed roundabout adjacent to Dr. King Elementary School or at a nearby intersection would be eliminated, and traffic heading to the medical and educational institutions in University Hill, downtown, or other assets to the north would continue to exit onto streets already designated as urban arterials.

The 481 Bypass/Community Grid plan largely results in increased travel times and slower speeds. By selecting this preferred alternative, NYSDOT has made clear that this is not a congestion relief project. Nor is this a volume accommodation project, based on the outdated and unreasonably low projected growth numbers NYSDOT uses in its analysis. Rather, the obvious and clearest project need centers on a basic engineering purpose – how to address a major Interstate facility that the NYSDOT describes as nearing the end of its “useful life,” a structural, but not functional description. With that general purpose at the heart of this project, it is indefensible for NYSDOT to attempt to promote without sufficient consideration an alternative that would increase travel time and slow traffic throughout the region and community, and as detailed below, fail to address the “connectivity” objectives for enhanced pedestrian and bicycle access.

- R 9-346: NYSDOT and FHWA considered the skyway concept. Please see response to **Comment 9-242**. Please refer to the response to **Comment 4-55** regarding the proposed roundabout, and the response to **Comment 6-3** regarding travel times.
- C 9-347: NYSDOT’s quantitative traffic analysis is fundamentally flawed even though NYSDOT’s own analysis has demonstrated that the 481 Bypass/Community Grid will increase travel times, vehicle miles traveled (“VMT”), and slow speeds in many areas, the agency continues to advance this as its preferred alternative. A cursory review of NYSDOT’s data – including quantitative comparisons between NYSDOT’s 2016 preliminary Draft Environmental Impact Statement, 2019 pDEIS and 2021 DEIS and qualitative assumptions – reveal extremely concerning inaccuracies. As detailed below, in some instances data is simply incorrect, and in others, assumptions cherry-picked to fit NYSDOT’s predetermined narrative. NYSDOT’s approach fails to take the requisite “hard look” at the mobility aspects of the proposed action by utilizing data and traffic modeling in such a disingenuous way. The DEIS traffic growth assumptions fail to withstand scrutiny. NYSDOT’s DEIS is fundamentally flawed because of its unreasonable and blatantly inaccurate summaries of projected traffic growth projections. This basic error results in projections that cannot, by definition, accurately assess how the alternatives retained for detailed study in the DEIS will perform in the short or longer terms. Pages 5-18 through 5-19 of the DEIS reveal the agency’s incorrect growth assumptions. It states: “All counts collected prior to 2013 were factored using an annual growth rate of 0.3 percent (estimated from the SMTC Regional Travel Demand Model) to represent a common

base year of 2013.” NYSDOT defends this assumption by stating: “the 2013 base year has been retained since the study area has not experienced significant travel pattern changes in recent years. For example, annual data such as ‘Syracuse Urban Area – VMT since 1985’ developed by NYSDOT shows a very stable vehicle miles traveled trend since 2013 for the functional classes of freeways, arterials, and collectors in the Syracuse urban area.” The agency’s assumptions, however, ignore the substantial traffic growth that was occurring prior to its 2013 “base year” in the very segment of I-81 that it is proposing to tear down. Based on available DOT data and our client’s analysis, a 0.3 percent annual growth rate does not accurately represent either actual traffic growth rates in the two decades prior to 2013, or changes that have occurred more recently. Traffic information made available online (it is not clear whether this data appear in the voluminous DEIS appendices) compiles traffic counts on various segments of New York State roadways and U.S. interstate highways. For purposes of these comments, we have located “Average Annual Daily Traffic” (or “AADT”) from 1995, 1998, 2001, and 2014 for the I-81 Viaduct segment. These data show that during the 19-year period between 1994 and 2014, traffic on this segment of I-81 grew over 51 percent, at an average of 2.71 percent annually. See Table 1, attached hereto as Exhibit D. This already gathered and verifiable information runs directly contrary to statistics published in the DEIS. NYSDOT projects traffic at key locations in the study area through the year 2056 (43 years after its “base year”) and states that there will be virtually a zero-growth rate per year – actually just 0.23 percent per year. See DEIS, Table 5-7, attached hereto as Exhibit E. Applying simple mathematics to the NYSDOT data, the DEIS projects an increase in the PM Peak Hour traffic on the existing Viaduct in the “no-build” scenario over the next 30+ years of just 646 total vehicles, or just 6.8 percent over that time period. NYSDOT fails to explain why or how future growth would be just 1/12th of the actually experienced growth in recent years. Again, performing simple math on the basis of NYSDOT’s own figures, if the agency used the 2.7 percent per year figure instead of its artificially suppressed number, I-81 traffic on the Viaduct would grow during that period to approximately 11,600 vehicles in the PM Peak Hour by 2056, for a total of 122.9 percent compared to 6.8 percent. See Tables 1, 2 and 3, attached hereto as Exhibit F. The assumptions used for background in the traffic analysis in the DDR/DEIS are outdated and fail to include future developments, such as a proposed aquarium at the Syracuse Inner Harbor off of I-81, a large, planned soccer and lacrosse complex in Salina, an Amazon distribution center in Clay, and a proposed semiconductor chip manufacturing plant in Clay. All these trends are known and call into question the basic traffic assumptions employed by NYSDOT in failing to update its modeling projections. More analysis must be performed and revealed to the public for further comment and review.

- R 9-347: For much of the Project Area, including the area where the viaduct would be removed, NYSDOT collected data in 2013 and therefore growth prior to 2013 was captured in the data. For some areas, older data was factored up to represent existing conditions using both a general 0.3 percent annual growth rate and the 2013 actual counts. So the observed 2013 counts were used as the baseline for balancing traffic throughout the network. The I-81 Viaduct Project Travel Demand Model was used to develop traffic projections for the opening and design years of the Project. The model accounts for varying growth at different locations

based on planned developments and land use changes captured in socioeconomic data prepared by SMTc. The 0.3 percent annual growth is a systemwide average and is not specific to any particular location. In addition, the Project's analyses and design are based on peak hour traffic volumes, not AADT, and growth is different for non-peak hours compared to peak hours. Numbers provided in **Table 5-7** are sample locations in a network comprising thousands of such locations, and these sample data points cannot be used to derive systemwide growth or growth at other specific locations. The 2013 base year traffic volumes have been revalidated by comparing the 2013 traffic data to more recent traffic counts and StreetLight AADT data that show negligible changes in traffic as recent as 2019.

- C 9-348: The DEIS fails to explain where existing and projected traffic on the I-81 viaduct and on Almond Street would be diverted. The 2019 pDEIS predicted that, in a "No Build" scenario, 2020 peak PM hour traffic would be 4,500 vehicles on a viaduct and 3,200 on Almond Street below, for a total of 7,700 vehicles. This breaks down to 58 percent of the combined traffic traveling above and 42 percent traveling below. However, under the I-481 Bypass/Community Grid scenario, NYSDOT predicted removal of I-81 would result in diversion of all I-81 traffic and a 41 percent reduction in Almond Street traffic without explaining where those 5,800 vehicles would be dispersed.

This unexplained discrepancy was amplified in the 2021 DEIS. A No Build alternative based on a 2026 projection predicts a count of 4,650 vehicles on the I-81 viaduct, plus 3,300 on Almond Street below, for a total of 7,950 vehicles. The DEIS predicts that the Community Grid, during the same PM rush hour, would only receive 1,906 vehicles on Almond Street. This would result in an incredible diversion of 6,044 vehicles in that peak hour alone. They do not appear in Salina, State Street or Townsend Street's counts. Once again, the NYSDOT analysis fails to explain to where these vehicles have been diverted to or why such a large discrepancy exists between the agency's two most recent traffic estimates.

These data are even more suspect when one considers the Syracuse Pass Through Traffic Study, cited in the DEIS, which finds that a mere 6 percent of I-81 viaduct traffic is through traffic, meaning 94 percent is local traffic on the way to local destinations. Therefore, NYSDOT's estimates of diverted traffic fail to consider that the vast majority of trips would be those likely to use local streets and arterials and, therefore, highly unlikely to elect to travel another 15-16 miles out of the way to divert to the I-481 Bypass.

Moreover, recent travel time analysis in the DEIS differs significantly with the pDEIS travel time estimates, even though the documents apparently rely on the same underlying data and were published only three years apart. With an I-481 Bypass/Community Grid, diversion from I-81 to I-481 on off-peak hours would add about 10 minutes to a trip. Peak-hour travel would experience even greater delays. NYSDOT's predicted diversion of traffic to I-481 would only take place if surface level travel through Syracuse were to deteriorate by at least 10 minutes in off-peak hours. As indicated above, these facts demonstrate that the proposed action, rather than promoting greater mobility, would actually increase traffic problems throughout the region.

R 9-348: Traffic from the viaduct would redistribute to many other routes including the new I-81, the Crouse/Irving Avenue interchange, the new Colvin Street exit, and many other streets. Under existing conditions, much of the traffic generated by University Hill and Downtown travels through the Adams Street/Harrison Street interchange, and this is why existing traffic volumes are high along the viaduct/Almond Street corridor. Under the Community Grid Alternative, this traffic would disperse to the various routes noted above. Also, pass-through traffic refers to traffic using I-81 with both origins and destinations north of the northern I-81/I-481 interchange and south of the southern I-81/I-481 interchange. There is substantial additional traffic that uses the viaduct to connect to I-690. For example, existing traffic may use northbound I-81/eastbound I-690 to access areas in East Syracuse and under the Community Grid Alternative, some of this traffic would use the new I-81/westbound I-690. Refer to **Section 5.6** of the DDR/DEIS and FDR/FEIS for additional detail, in particular, **Section 5.6.1**, which includes a discussion of traffic redistribution due to the removal of the viaduct.

C 9-349: Figure 1-2 of the DEIS depicts NYSDOT's "Study Area" for purposes of the most important aspect of its NEPA analysis – the assessment of how alternatives will (or will not) meet the mobility element of the project Purpose and Need. The figure shows an extremely narrow area tightly drawn around the existing I-81, I-481, and I-690 corridors. The verbal description of the study area confirms that the total geographic reach of the study area extends a mere quarter mile on either side of these highway facilities. This deliberate decision to constrain what streets and intersections were evaluated for congestion and traffic performance avoids a wide range of potential effects throughout the City and around the region as a result of anticipated diverted traffic following the proposed removal of the I-81 viaduct.

The DEIS fails to analyze a number of crucial intersections and where projected traffic would be diverted. In the pDEIS, there were few if any intersectional analyses presented regarding the southbound I-81 traffic that would find it necessary to exit I-81 a considerable distance north of downtown onto North Clinton Street. In the DEIS, five significant intersections are still missing, including without explanation, the intersection of North Clinton Street with Butternut Street adjacent to the newly constructed Butternut Street bridge, Franklin Street at Genant, Clinton Street at Genant, Clinton Street at Division Street, and Clinton Street at Spencer. These intersections would have a serious impact on southbound I-81 traffic entering Syracuse and must be studied.

This deficiently narrow focus is further demonstrated by NYSDOT's illogical view of the main "generators" of traffic throughout the region. Specifically, the DEIS states on p. 5-19: "The largest employment centers in Onondaga County, Downtown and University Hill, are located near the Geographic center of the City of Syracuse and are situated south of the I-81/I-690 interchange." Yet, this broad assumption conflicts with information presented in the SMTC Travel Demand model document (see pp. 46-49, attached hereto as Exhibit I), which identifies the five largest "generators" of traffic as: "(a) University Hill Hospitals, (b) Carousel Center, (c) Syracuse University, (d) Hancock Airport, and (e) OnCenter." Even at that, the Carousel Center data included in the DEIS was out of date since the facility had already become Destiny USA. The DEIS provides no explanation as to why NYSDOT's version of the largest

employment centers are solely clustered adjacent to the proposed at-grade arterial and not recognizing major centers that clearly impact regional transportation patterns.

The Study Area must be expanded to account for other major traffic generating uses. Manufacturing, trade, transportation, and utilities are the second largest employment sector in the Syracuse region, with 23.8 percent of employment in this sector. Inclusion of additional traffic generators in an expanded Study Area could have a major impact on the travel demand model and must be updated and shared with the public in a supplemental DEIS.

R 9-349: **Figure 1-2** of the DDR/DEIS and FDR/FEIS depicts the Project Area, which comprises the physical limits of disturbance and includes areas where Project elements may be implemented. To evaluate the potential social, economic, and environmental effects of the Project, the Project Area includes four separate study areas: Central Study Area; I-481 South Study Area; I-481 East Study Area; and I-481 North Study Area. Each study area includes the Project limits of the subarea as well as a ¼-mile area surrounding the Project limits unless otherwise specified. For some topics—such as air quality, noise, cultural resources, traffic, and others—a special study area is defined for consistency with regulatory requirements or to capture a larger or smaller area of potential effects for the Project. The Project's traffic study area includes all areas that may experience traffic-related impacts and is sufficient to evaluate the effects of the Project on traffic operations. Beyond these limits, the Project would not affect traffic flow as substantial travel pattern changes due to the Project would occur within these limits only. **Figures 5-32 through 5-35** in the DDR/DEIS and FDR/FEIS show intersection level of service (LOS) results for the Project. Although these North Clinton Street intersections' LOS are not reported on these figures, the line work on these graphics represents streets in the Project's VISSIM traffic simulation model, and it can be seen that North Clinton Street is included in the model. These intersection LOS results were not reported because they accommodate low traffic volumes, and the Project would have little effect at these locations since BL 81 would continue to operate as a limited access highway north of I-690 under the Community Grid Alternative and would be widened/improved. The statement on page 5-19 of the DDR/DEIS regarding employment centers is presented as a general discussion of some major traffic generators in the Project Area but is not meant to be an all-inclusive discussion of traffic generators. However, all of the major generators/activity centers noted in the comment are included in the Project's travel demand model based socio-economic and demographic (SED) data for the region.

C 9-350: The DEIS and the pDEIS both used 2013 “Existing” Data for baseline traffic analysis – the same data that NYSDOT began analyzing in their 2016 analysis. Yet, a comparison of the two documents released about two and a half years apart shows that the same “existing” baseline had changed, yet another indication of the need for revisiting traffic analysis in a supplemental document. Two examples follow.

According to the 2019 pDEIS, I-81 from Exit 17 to Exit 29 took 13 minutes to travel northbound in the morning and 14 minutes to travel northbound in the afternoon, with a travel delay of 2 minutes in the morning and 3 in the evening, and a travel speed of 55 mph in the morning and

52 mph in the evening. Now, DEIS Table 5-1 indicates that same 2013 trip took 12 minutes to travel northbound in the morning and 12 minutes to travel northbound in the afternoon, with a travel delay of 1 minute in both the morning and afternoon, and a travel speed of 60 mph in the morning and 49 mph in the afternoon. (See pDEIS and DEIS Table 5-1, 2013 Existing Travel Time, Delay, and Speeds)

Under the pDEIS and DEIS, travel times for key origin-destination pairs in Onondaga County were estimated using output from VISSIM traffic simulations as well as the SMTC Regional Travel Demand Model. VISSIM is a microscopic, time-step, and behavior-based model that analyzes multi-modal traffic flows with the flexibility of modeling all types of geometries and traffic control schemes. Details of the VISSIM model development are documented in the VISSIM Development and Calibration Report located in Appendix C-2 and indicate the model has not been updated since November 2017. However, five “existing” data points have changed for the Destiny USA analysis in Table 5-2 travel times between the pDEIS and DEIS.

R 9-350: Many changes to the Project occurred in the time between the publication of the two documents cited, including design changes and extending the design year from 2050 to 2056. With respect to differences in existing travel times presented in the two documents, because changes were made to the alternatives, additional intersections were included in the Project. Therefore, the existing and No Build conditions models were re-run to include the new locations. Due to the stochastic nature of the traffic simulation models as described in **Appendix C-2**, there is a variability between individual simulations, even when model geometry and demand are identical. This stochasticity actually provides a better representation of conditions, as no peak hour is exactly the same from day to day. In addition, the values in **Table 5-1** are presented as whole numbers and there is some rounding variability as well.

C 9-351: NYSDOT’s projections for both population growth and land use changes for the Syracuse region are not adequately described. In the ordinary course, creation of a travel demand model should reflect at least the following four steps: (i) trip generation, (ii) trip distribution, (iii) mode split, and (iv) traffic assignment – all of which rely upon population growth and land use changes.

Land use assumptions must be held constant in creating reliable traffic modeling. Based upon review of the DEIS, it appears that NYSDOT abandoned best practices and arbitrarily picked which land use assumptions to apply to its analysis. NYSDOT considers, at length, potential future development in downtown Syracuse based on a proposed Syracuse-wide zoning text amendment – an action that has not been approved and a zoning document does not, on its own, generate new land use development. At the same time, however, the DEIS fails to consider potential future development in and around Destiny USA. The DEIS simply states the 481 Bypass/Community Grid would not impede or prevent planned development within the Central, I-481 South, I-481 East, and I-481 North Study Areas (DEIS 6-2-1.4.3). This statement is incorrect. The DEIS does not account for the fact that most undeveloped land within the City of Syracuse sits within the Lakefront neighborhood. It also fails to account for

the proposed Syracuse Aquarium on Syracuse's Inner Harbor. Local officials expect half of the visitors to the Syracuse Aquarium to travel from within an hour's drive of Syracuse, and the other half within a two-hour drive. Hundreds of jobs would be created, both construction and permanent. These are all visitors who are otherwise unaccounted for in NYSDOT's DEIS. How can development near small lots under the existing Viaduct and surface street grid be considered "planned," but major developments with huge economic impacts less than two miles from that area be ignored? The travel demand model must be rerun.

Indeed, the DEIS devotes several pages to the City of Syracuse's proposed Citywide rezoning process and potential future developments (and impacts the project could have on these potential future developments since 2015). The City of Syracuse has been undergoing a City-wide zoning text and map update called ReZone Syracuse (see DEIS Figure 6-3-2-4). The "Final Draft Zoning" Ordinance, dated December 2019, proposes to rezone much of the area adjacent to the existing I-81 within the Central Study Area as "MX-5 Central Business District." According to the DEIS, the proposed new MX-5 District would consolidate the numerous existing Central Business District zones that have a wide range of uses allowed and dimensional standards. New development in this area would likely be mixed-use and could include combinations of residential, retail, medical, educational, and office uses. NYSDOT determines that redevelopment of properties consistent with ReZone Syracuse would increase employment and business opportunities. However, increases in growth rates aren't accounted for in NYSDOT's quantitative metrics (nor in qualitative metrics, such as parking).

It is plainly arbitrary for NYSDOT to fail to account for other developable properties owned by Pyramid/Destiny and other property owners in the Lakefront Area and simply categorizing these sites as vacant land when creating its traffic projections. In fact, land in the Lakefront Area is slated for development of the new Syracuse Aquarium – a proposed development that would be an additional traffic generator within a block of Destiny USA. There are also numerous new apartment homes created with the intent of developing a mixed use community in a portion of the Lakefront Area; building on the tourism assets that already exist. This error is even more egregious when one considers that Destiny has already received notice from the agency of its intention to condemn some of that very same developable land in order to build out the 481 Bypass/Community Grid with a five-acre scenic overlook.

- R 9-351: The I-81 Project Travel Demand model assumes background growth in the opening year and horizon year scenarios to account for growth resulting from future development that is expected to occur throughout the metropolitan area based on socioeconomic data available from SMTC, which has been developed based on expected changes in land use. As the plans for the potential or hypothetical specific future projects continue to evolve, each of those projects that generates additional traffic will be responsible for evaluating and mitigating the individual impacts caused by those impacts. The I-81 Project Travel Demand model includes "special generators," which are modeled to accurately reflect temporal variations in trip attractions based on the specific land use characteristics and operations of each generator. Hancock International Airport, the Carrier Dome, and Destiny USA are among those facilities which are coded in the model in this manner. The model specifically accounts for trip

generation at the Destiny complex including the retail square footage associated with the original Carousel Center as well as the subsequent Destiny USA expansion.

- C 9-352: NYSDOT has used the COVID-19 pandemic to modify assumptions as NYSDOT deems fit, without any underlying data to support such assumption. Parking demand assumptions were made on the basis that more people will be telecommuting, reducing the need for parking, with the DEIS stating "... as a result of anticipated continued increase in telecommuting and to reflect an increase in the use of parking information technologies in the future, it was determined that a 25 percent reduction in the parking spaces to be mitigated would be applied to account for an anticipated increase in the number of people who will continue telecommuting over the long term, resulting in a reduced need for parking supply." (see DEIS p. 5-178)

Oddly, 2020 remained the parking base year for which a future project is analyzed (unlike the other scenarios which were changed to 2026 and 2056). The rationales provided in a footnote states, "the original analysis was based on an ETC [estimated time of completion] of 2020, and while the ETC has been revised to 2026, the ETC change does not change the analysis or conditions, therefore the 2020 analysis is still valid". (see DEIS p. 5-174). On one hand, NYSDOT argues that there have been so few changes that a parking ETC analysis of 2020 is valid, while on the other providing a 25 percent reduction in the need for parking based on telecommuting from COVID-19. NYSDOT cannot simply pick and choose which variables are convenient for their analysis. While parking reductions may be true for some industries, Syracuse is a City of anchor institutions: hospitals and universities that are less likely to feel the impacts of telecommuting. Even with telecommuting, a 25 percent reduction is arbitrary at best.

- R 9-352: The 25 percent reduction in parking proposed in the DDR/DEIS has been eliminated, and the FDR/FEIS shows 100 percent mitigation of lost public parking.
- C 9-353: Increases in trucking and transportation logistics expansion were largely ignored by the DEIS, as were substantial recent trucking projects within the Syracuse area. For example, the DEIS ignores an increase in employment at an Amazon warehouse constructed in Clay, which has announced hiring 500 more employees than initially expected. This warehouse has been planned for multiple years, so it is unclear why the DEIS would not track and update assumptions regarding the warehouse. Traffic consultants have predicted the Amazon warehouse will result in 1,289 vehicles entering or exiting the distribution center during peak morning hours, and 1,268 vehicles during the peak afternoon hours. This is in addition to an Amazon delivery station in Dewitt which consists of a 112,000 sq. ft. warehouse, 50 to 100 full and part time jobs, and hundreds of independent contractors. While the DEIS admits some alternatives would improve highway freight movement (see discussion of the Viaduct Alternative on DEIS p. 5-124), the 481 Bypass/Community Grid would broadly distribute truck traffic on the local street system. Truck traffic would increase more substantially on MLK, Jr. East, Almond Street, Clinton Street, and Salina Street). The DEIS admits the 481 Bypass/

Community Grid will bring trucks, noise, and pollution to the street level, and this is without taking into account major new trucking and transportation logistics projects.

While NYSDOT made many assumptions regarding parking based on COVID in order to fit their narrative, no such assumptions were made in the DEIS regarding the potential increase in shipping demands due to people sheltering at home or becoming reliant on online ordering. Nor were new assumptions made based on travel demand times. COVID-19 has changed when people are on the road. Perhaps there isn't as much of an early morning rush hour, but numerous car trips around lunchtime. Flexibility in work schedules may lead to more people getting on the road for a long weekend on Thursday evening. The types of trips – such as suburb to suburb – may change based on Census numbers. None of these new behavioral metrics are accounted for. If COVID would have a 25 percent impact on parking, wouldn't COVID also impact the trip times and destinations that should be reviewed in a DEIS?

R 9-353: NYSDOT has reviewed the traffic study reports associated with the Amazon facility development. Peak traffic generation hours for these developments do not coincide with the peak traffic hours analyzed for the I-81 Viaduct Project (i.e., most traffic generated by these developments would occur when background traffic volumes are lower than those analyzed for the Project). In addition, NYSDOT's analyses included projected traffic volume growth for 30 years after the Project is built. The traffic analyses for 2056 (ETC+30, see **Chapter 5** and **Appendix C-3** of the DDR/DEIS and FDR/FEIS) indicate that there would be enough excess capacity such that these developments would not be a concern with respect to the Project's design.

C 9-354: Destiny USA has wanted to understand NYSDOT's quantitative and qualitative assumptions for several years. Consultants Parametrix Engineering attempted to request additional data from NYSDOT to better understand these assumptions. Parametrix submitted a FOIL Request, which asked for copies of specific documents in eight categories, to wit, the documents containing the data and assumptions underlying the pDEIS. Most, if not all, of the categories request data only, which is specifically exempted from the intra-/inter-agency materials exception and are not permitted to be withheld from public scrutiny. The request included:

- "All VISSIM files utilized in preparation of the Preliminary DEIS in readable electronic format." VISSIM is traffic simulation software, and by definition "VISSIM files" are "statistical or factual tabulations or data" within the meaning of Section 87(2)(g)(i).
- "The travel demand model data bank utilized to forecast redistribution of traffic and assumptions utilized for trip diversion under the Community Grid alternative in a readable electronic format." Again, this request is clearly for "data" within the meaning of Section 87(2)(g)(i).
- "All trip tables from the travel demand model . . . in a readable electronic format." Yet again, this request is clearly for "data" within the meaning of Section 87(2)(g)(i).

For months, the request was pending until ultimately denied under the intra-/inter-agency exception. Now that the DEIS has been issued and data changes are even more widespread

throughout the DEIS, it is imperative that all pDEIS and DEIS data be released so inconsistencies in data can be addressed and the full impact can be understood. The data must be made available to the public in order for the public to reasonably and rationally review and comment on any NYSDOT DEIS. This is another reason the NYSDOT should commence a supplemental DEIS process.

R 9-354: The referenced FOIL request was properly responded to, with the application of FOIL exemptions being upheld upon administrative appeal. The DDR/DEIS and FDR/FEIS include voluminous quantities of data supporting the study and its analysis. Moreover, the data was made available prior to the FOIL request as part of the pDEIS release.

C 9-355: NYSDOT touts the 481 Bypass/Community Grid as a connector of a community historically divided by the existing I-81 Viaduct. The DEIS attempts to paint a rosy picture of what a future without the existing I-81 Viaduct would be – wide open pedestrian spaces, parks, and bike paths. In reality, though, NYSDOT is proposing to lower the highway to street level and in so doing negatively impact the communities it is reportedly focused on assisting by increasing local street traffic, increasing noise and air pollution, adversely impacting public transportation routes, and diminishing safety and housing opportunities. By not adequately reviewing and disclosing these fundamental impacts, NYSDOT has failed to take NEPA's requisite "hard look."

NYSDOT concludes that existing bus routes won't be impacted under the 481 Bypass/Community Grid. However, NYSDOT admits, "... many bus routes potentially would be affected by implementation of the Community Grid..." on existing bus operations that may require rerouting of buses for portions of their existing bus service routes. This may subsequently affect bus stop locations and possibly schedules. There are far too many "may" statements in this analysis to know the truth. While bus usage is a transportation issue, bus access is also an equity issue that must be considered in greater detail.

R 9-355: **Chapters 5 and 6** of the DDR/DEIS and FDR/FEIS disclose traffic and environmental impacts of the Viaduct and Community Grid Alternatives. **Chapter 8** discusses why the Community Grid was identified as the preferred alternative.

Based on the evaluations presented in **Chapters 5 and 6**, the Community Grid Alternative would not negatively impact communities through increased local street traffic, increased noise and air pollution, or diminished safety and housing opportunities. As indicated in **Section 6-4-6**, there are some areas where noise levels would be increased; however, for the majority of receptors, noise levels for the Community Grid Alternative are predicted to be lower than for the No Build Alternative. Noise level increases and decreases are site-specific for each individual receptor. While numerous other factors are at play, much of the noise emanating from the I-81 viaduct, in the Central Study Area, is closely related to vehicle speeds, volumes, and classifications. If the I-81 viaduct were to be removed and traffic were placed on the roadway network, speeds would be reduced, overall traffic volumes would be reduced, and the vehicle classifications would shift to less heavy vehicles. For most of the receptors in the vicinity of the viaduct, it is predicted that potential noise increases from

placement of the viaduct traffic onto the roadway network would be more than offset by the expected noise decreases due to lower speeds, lower overall volumes, and less heavy vehicles. There are site specific locations throughout the corridor where other factors such as changes in ramps or traffic patterns would increase (or decrease) local noise levels for nearby receptors. Noise level increases and decreases are detailed within the text of **Section 6-4-6** and within the tables and figures found in **Appendix H**.

With respect to air quality, future traffic and emissions of pollutants associated with vehicle volumes are projected to increase on individual roadway segments that would become the preferred routes. However, there would also be areas where traffic signal or changes in lane geometry would improve travel speeds and traffic operations. Consequently, vehicle emissions are projected to decrease on these segments and would offset segments with increased emissions within the region. The Community Grid Alternative would result in an overall net reduction of vehicle miles traveled within the study area when compared to the No Build Alternative by approximately 4,163,044 miles per year within the year of completion and 5,683,886 within the design year (see **Table 6-4-4-10** in **Chapter 6-4-4, Air Quality**). In addition, a particulate matter (PM) microscale analysis was conducted at four representative intersections for the Community Grid Alternative using NYSDOT, FHWA, and U.S. Environmental Protection Agency (USEPA) procedures. The analysis was performed using the USEPA emissions model MOVES2014a and dispersion model CAL3QHCR. Sites were selected for analysis based on projected traffic conditions, the introduction of new and/or modified roadways, the proximity to sensitive receptors, and if sites would be located within environmental justice communities. The analyses concluded that PM concentrations would be below the USEPA's National Ambient Air Quality Standards. Therefore, there would be no potential for adverse air quality impacts for the Community Grid Alternative.

As discussed in **Chapter 5**, the impacted portions of the existing bus routes would not be long (compared with the entire length of the routes) and, therefore, the expected delays, detours, and bus stop relocations should be minimal. As part of the development of the Community Grid Alternative, NYSDOT has and will continue to coordinate with Centro on potential street improvements (including transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the Project limits to enhance and support Centro's transit initiatives.

- C 9-356: School and neighborhood safety is a serious concern. To accommodate traffic which was previously elevated but would be at ground level under the 481 Bypass/Community Grid, a roundabout would be constructed immediately adjacent to the Dr. King Jr. Elementary School. This traffic circle would be approximately 120 feet from the elementary school, with approximately 35,000 cars a day passing through a pre-kindergarten through grade seven school serving over 500 children, the majority being in grades kindergarten to grade five. When NYSDOT was asked about the proposed roundabout, NYSDOT I-81 Mark Frechette stated, "More to come on the roundabout. Give us a chance to do the appropriate analysis." Shouldn't that analysis have been conducted already, before proposing an alternative?

At public meetings, NYSDOT officials have said pedestrian safety was considered, with sidewalks and bike access being located on the west side of the roundabout. Yet this does not take into consideration students who might have to cross the roundabout to walk to school, or whether peak volumes of traffic will be flowing through this area at the same time students are traveling to or leaving from the school. Creating an intense traffic circle so close to a school for young children disproportionately impacts the local community. Regardless of location, the elimination of an elevated main interstate puts tens of thousands of cars through City neighborhoods.

Recent press reports and public statements by NYSDOT officials cited above seem to indicate that the agency will be reconsidering this roundabout proposal. Yet slight modifications to the location of the roundabout facility would do nothing to solve the basic challenge associated with the agency's preferred alternative. Moving the roundabout a couple of blocks north or south of the school (which has been discussed in public) would still impact neighborhood students walking or riding to school. Regardless of its ultimate location, the community's objections to the roundabout feature highlight the inherent flaw in the Grid proposal which would put tens of thousands of vehicles on city streets instead of a limited-access facility. Without the I-81 Viaduct, or a reasonable replacement, traffic would simply move to neighborhood streets and intersections, adversely impacting the community in multiple ways.

- R 9-356: FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East, and BL 81 would not connect to MLK, Jr. East (see **Section 3.4.3** of this FDR/FEIS). MLK, Jr. East would terminate at the driveway of the Dr. King Elementary School (instead of at Renwick Avenue as it does today). Pedestrians and bicyclists also would be unable to cross BL 81 at MLK, Jr. East; instead, they would use a new shared use (bicycle and pedestrian) path along the west side of BL 81 to travel between MLK, Jr. East and Burt Street, where a signalized intersection would allow them to cross east-west. Nationwide data supports the conclusion that modern roundabouts in residential neighborhoods operate safely and roundabouts have been successfully implemented throughout the state. A modern roundabout is designed so that the fastest a motorist could drive through it would be approximately 20-30 mph. Under the Community Grid Alternative, a roundabout is now proposed at Almond Street and Van Buren Street.
- C 9-357: The DEIS concludes that there will not be an impact to any environmental justice communities in regard to air quality, noise, or visual resources. According to the DEIS, the 481 Bypass/Community Grid Alternative would result in some adverse visual impacts, but these would be offset by beneficial visual effects. In some locations, air pollution concentrations are projected to remain the same or decrease when compared with the No Build Alternative due to shift in roadway geometry, but in other places they will increase. Without abatement, the noise level increase at 21 receivers would be perceptible, and 19 of these 21 receivers are in environmental justice communities. Ultimately, while the 481 Bypass/Community Grid was not found to have detrimental impacts on environmental justice communities, this could very well be untrue if accurate facts were used and metrics corrected. If additional trucks suddenly enter the street, this would increase emissions and, in turn, air pollution and noise. With traffic

slowing and cars are idling at thirteen new traffic lights, pollution will increase. The air quality impacts due to these traffic delays must be analyzed and crucial health and quality of life issues must be fully and accurately reviewed for the health and wellness of local residents.

R 9-357: The air quality and noise analyses included the appropriate traffic data (see **Section 6-4-4** and **Section 6-4-6** of the DDR/DEIS and FDR/FEIS). See **Section 6-2-3** of the DDR/DEIS and FDR/FEIS for an assessment related to environmental justice.

C 9-358: It is unclear if the DEIS truly captures housing displacement. For example, the DEIS provides lists of buildings that would be demolished or displaced due to each alternative. However, NYSDOT images show additional housing displacement. The DEIS indicates that under the 481 Bypass/Community Grid, 35 employees would be displaced, but no homes would be. Yet this image of the proposed traffic circle next to the Dr. Martin Luther King Jr. School does not show houses that are immediately adjacent to the highway or the schools. It is unclear why NYSDOT isn't showing these houses in the images and what impacts could exist for the Pioneer Homes, McKinney Manor, and Central Village.

R 9-358: The roundabout previously proposed at MLK, Jr. East in the DDR/DEIS, which is no longer proposed in this FDR/FEIS, would not have resulted in any building acquisition (see **Section 6-3-1** of the DDR/DEIS and FDR/FEIS for additional information on building acquisitions).

C 9-359: NYSDOT Fails to Recognize or To Review Accurately How the Preferred Alternative Would Negatively Impact Syracuse's Industries and Tourism Economy. As the November 1999 Tourism Assessment makes clear, it has been a long-term goal of Syracuse and Central New York to be considered a unique and well-known destination for overnight visitors. Business conventions, college sporting events, NYS state fairgrounds, and Destiny USA have all made Syracuse a destination within New York.

Since 1999, this trend has continued. The planned Syracuse Aquarium has an anticipated economic impact of \$50 million a year. Business opportunities are booming with the proposed Clay semiconductor chip manufacturing plant which would bring a \$10 billion to \$20 billion investment to the area. Opportunities for tourism continue to grow and, with these opportunities, increased numbers of people, tax revenues, and local benefits.

The Syracuse Hancock International Airport is also slated for expansion, with a new parking facility, new amenities, and a new Federal Inspection Statement being constructed to allow the airport to accommodate international flights. A new airline and four new flight routes will also enhance the airport's offerings beginning in November 2021 and will cater largely to leisure (rather than business) travelers, enhancing tourism opportunities in the region. These changes are all part of a 2021 Master Plan Update for the airport. These important updates to the airport – and subsequent increase in tourism and traffic – are not accounted for in the DEIS.

However, NYSDOT has admitted the DEIS does not include any consideration of future economic development, and review of data indicates that NYSDOT's assumptions regarding

potential impacts on long-established businesses along I-81 are flawed. While we have previously noted trucking and transportation logistics as economic growth segments which were not properly accounted for, the same is true for Destiny USA and the hotel and tourism industry in the Syracuse region.

- R 9-359: The analyses in the DDR/DEIS and FDR/FEIS follow appropriate methodologies in assessing the potential effects of the Project alternatives at the local and regional levels. The analysis considered the consistency of the Project alternatives with the long-term regional planning goals documented in local and regional planning studies (see **Section 6-2-1**). As noted in the comment, tourism and new business opportunities are growing in the region. The Project alternatives would not substantively alter these trends in a manner warranting analyses beyond those already included in the projections of future traffic and economic conditions in the DDR/DEIS and FDR/FEIS. **Section 6-3-2** considers the potential effects on freight (trucking), as well as the potential effects on hotels and Destiny USA. The projected changes in travel time and travel patterns would not adversely affect Syracuse's and Central New York's long-term goal of establishing itself as a well-known destination for overnight visitors. Destiny USA would continue to serve as a major destination draw for the region, contributing to tourism economy, and hotels within the region would continue to be well-positioned to benefit from the tourism industry.
- C 9-360: The DEIS states at p. 6-142 that the indirect displacement of an individual business due to market change is an economic issue, not environmental, and is not, in itself, the subject of the DEIS. "However, the DDR/DEIS does consider the potential effects of displacement at a neighborhood level, i.e., whether a project could lead to indirect displacement that in turn leads to disinvestment in a neighborhood, which is an environmental concern." This narrow approach violates requirements of the CEQ NEPA regulations, which clarify that when "economic or social and natural or physical environmental effects are interrelated, the EIS will discuss all of these effects on the human environment." Impacts to Destiny, as the largest employment center in the Lakefront Area and one of the largest employment centers in the Syracuse region, could clearly have potential negative impacts in the study area. This would clearly be an "interrelated effect" of the proposed action, one that the DEIS as currently drafted essentially ignores. NYSDOT must review in a supplemental DEIS its economic impact analysis to extend beyond "displacement" at the neighborhood level.
- R 9-360: Consistent with the requirements of CEQ NEPA regulations, **Section 6-3-2** and **Appendix D-2** consider the potential beneficial and adverse effects of the Project alternatives on the local and regional economies. The DDR/DEIS statement cited (at page 6-142) conveys that the displacement of an individual business, in itself, is not an environmental issue, but can lead to adverse environmental effects warranting consideration if its displacement leads to disinvestment. In response to public comments on the preliminary DDR/DEIS and recognizing the importance of Destiny USA to both local and regional economies, the DDR/DEIS included a supplemental analysis that specifically considers the potential effects of the Project alternatives on Destiny USA.

C 9-361: Detrimental impacts on Destiny USA would certainly have a broader reaching impact on the entire local community, as clearly evidenced by Destiny USA General Manager Robert Schoeneck's economic analysis, attached hereto as Exhibit K. Prior to the impacts of COVID-19, Destiny USA generated approximately \$38.5 million in annual sales tax to the local government and state government. NYSDOT may not have considered this, though, as the DEIS fails to classify Destiny USA as an "anchor institution" – the DEIS description for employers ranging from 943 to 9,525 employees – a gross oversight for a business that employs approximately 5,000 people and employed over 5,500 prior to the COVID-19 pandemic. Similarly, Destiny is one of the largest employers in the region but is not included as a large "employment center" despite being classified as an "employment center" in the Centerstate Fact Sheet. It seems that instead, the DEIS capriciously considers the individual impact of the businesses located within Destiny, not the cumulative impact. However, this is not justified and would be analogous to every department at Syracuse University being considered separately. Importantly, the DEIS appears to wrongly model for the 2013/14 period when it stated Destiny USA consisted of 1.5 million square feet of Gross Leasable Area. However, that information was accurate as of 1990. The center was substantially expanded to 2.4 million square feet of GLA in August 2012 and was substantially occupied by 2013, the agency's "base year." While NYSDOT's narrative cites to the expanded 2.4 million square feet, the Syracuse Passthrough Traffic Study (on which NYSDOT based the traffic model) was conducted in 2010 using the outdated square footage figure of 1.5 million square feet. Thus, whatever weight the Travel Demand Model applied to the Destiny USA was dramatically understated.

Further, Destiny USA has cleaned up an entire previously industrial neighborhood of Syracuse and brought many tourists to the area as the eighth largest enclosed shopping complex in the United States and the largest shopping, dining, and entertainment venue in New York State. Rather than use these important facts to stress the importance of Destiny USA to the local economy, the DEIS seems to take a position that Destiny USA's reach is so far, and customer base so wide, that no impact would occur despite the cutting off access to the property as a result of implementation of the 481 Bypass/Community Grid. NYSDOT incorrectly claims that certain businesses, such as Destiny USA, are "resilient" to traffic changes based on the DEIS's faulty traffic analysis, including the Origin-Destination data.

Rather than acknowledge the importance of vehicular travel for Destiny USA, NYSDOT claims that Destiny's wide consumer base will not be deterred by additional travel time. There are no data points to back up this claim, nor any analysis of how local and regional shoppers will react to increased travel times. NYSDOT also claims Destiny USA does not receive a substantial amount of consumer traffic from those who simply saw Destiny from the road. NYSDOT claims "only" 2.8 percent of visits would be lost by the reconfiguration of I-81 into a Community Grid. Destiny's own data clearly indicates this is incorrect. The DEIS fails to address the large number of consumers who arrive by coach bus – a sector where Destiny USA saw an 11 percent increase in traffic between 2018 and 2019. If tour bus routes are impacted, Destiny USA's customer base could be impacted as well. Syracuse's Centro bus routes to Destiny USA may be impacted as well. Potentially impacted bus routes include

Route 45 Destiny USA; Route 50 Destiny USA via I-81; Route 550 Destiny USA. If NYSDOT isn't sure about which routes will change, how can they be sure there will not be an impact?

As a general matter, NYSDOT would have known all of these facts had they ever met with Destiny with the goal to understand it and I-81's impacts. NYSDOT never made that effort despite Destiny USA's continued outreach and involvement in the proposed project.

- R 9-361: The DDR/DEIS description for "anchor" is not tied to a specific employee count. The cited range of 943 to 9,525 employees is from **Table 6-3-2-4**, which is a listing of major employers in the Central Study Area from the Onondaga County website, and does not list Destiny USA. It should also be noted that in referencing **Table 6-3-2-4**, the DDR/DEIS states, "In addition [to businesses identified in the table], the retail and food service businesses within Destiny USA are substantial employers." The DDR/DEIS has been updated to include the following amended statement as part of the FDR/FEIS: "In addition, the retail and food service businesses within Destiny USA are substantial employers; Destiny USA and its tenants collectively employ approximately 5,000 workers." The DDR/DEIS acknowledges the importance of vehicular travel for Destiny USA, stating, "Destiny USA's national and local retail, dining, and entertainment attractions draw customers from the City of Syracuse, the Region, and elsewhere in New York State, Pennsylvania, and Canada. As such, Destiny USA, like many large shopping malls, relies on its proximity to highways as they provide regional high-capacity access to and from these attractions." Similarly, the DDR/DEIS continues to recognize Destiny USA's importance and the potential effects of Project alternatives on Destiny USA; **Section 6-3-2** characterizes Destiny USA as "an important component of the local and regional economy" and includes analysis that specifically considers the potential effects of Project alternatives on Destiny USA. The analysis considers the overall retail landscape within the region, Destiny USA's retail composition, Destiny USA's consumer trade areas, projected changes in travel times within Destiny USA's consumer trade areas, points of origin for visitors to Destiny USA based on StreetLight data, and likely capture rates for "pass-through" traffic for malls with over 1 million square feet of gross leasable area. The analysis in **Section 6-3-2** includes consideration of how local and regional shoppers will react to increased travel times, and finds that based on projected travel times, existing Destiny USA visitors who had Destiny USA as their trip purpose would continue to frequent the mall. As detailed in **Section 6-3-2**, there would be no change in overall average daily travel time to Destiny USA; average daily travel time from locations within the Syracuse Metropolitan Area to Destiny USA would be 14 to 16 minutes under the No Build and Community Grid Alternatives, which is less than the 20 minutes a typical consumer is willing to travel for clothing and other mall retailers.¹ The locations that are predicted to experience increased travel times to Destiny USA (presented in **Table 6-3-2-12**) would experience one minute or less of incremental travel time, with the exception of LaFayette, where guests could experience an increase in travel time of five minutes in the PM peak hour. With respect to the

¹ The Impact of Retail Proximity on Consumer Purchases, prepared by Access: https://cdn2.hubspot.net/hubfs/263750/Access_Consumer_Spend_Study_2016.pdf

DDR/DEIS estimate that Destiny USA would lose 2.8 percent of consumer trips under the Community Grid Alternative, as detailed in **Section 6-3-2**, the estimate is based on StreetLight origin-destination data specific to Destiny USA, and utilizes an extremely conservative assumption of 34 percent pass-by capture, which is the average pass-by capture rate for shopping centers of various sizes including those that contain a larger percentage of convenience goods. ITE data shows a correlation between Average Pass-by Trip Percentage and Gross Leasable Area of a Shopping Center, with larger shopping centers capturing substantially fewer pass-by trips (ITE Trip Generation Handbook, 3rd Edition, Figure E.7, Shopping Center (820)). The Community Grid alternative would still be fully accessible by Coach buses. Finally, the traffic models used on the Project are not based on the Syracuse Passthrough Traffic Study. The traffic volumes developed for the project are based on forecasts from the I-81 Project Travel Demand model. The model specifically accounts for trip generation at the Destiny complex including the retail square footage associated with the original Carousel Center as well as the subsequent Destiny USA expansion.

- C 9-362: NYSDOT takes a flippant approach to tourism, including on the hotel industry, and especially in light of COVID-19. While NYSDOT used COVID-19 to refine parking assumptions, it wholly ignored COVID-19's detrimental impact on tourism and hotels. For some hotels in Syracuse, COVID reduced tourism dramatically, to the point there were few (if any) profitable months.

Many hotels in Syracuse rely on same-day bookings which are largely attributable to a hotel's proximity to I-81 and visual cues. These same hotels also rely on conferences that are booked due to Syracuse's central location and accessibility. Hotels anticipate a significant decrease in conferences due to construction related to the 481 Bypass/Community Grid. This, coupled with the impacts of COVID, could result in major impacts to the hotel sector, as well as a major loss in sales tax and property tax revenues.

How has NYSDOT responded to hotel owner's concerns? By simply arguing that while there will be approximately 11,000 fewer cars a day passing by hotels off of I-81, overall the hotels will be benefitted due to construction workers using hotels during the project, "better" connectivity, and more economic activity in the area after the 481 Bypass/Community Grid is complete. While NYSDOT states there will be more economic activity, this activity is not included in DEIS assumptions. NYSDOT has told the hotel industry that I-481 could attract new "highway-oriented investments" which benefit hotels. These "highway-oriented investments" are also excluded from any "future development" analysis in the DEIS. NYSDOT admits total bookings will decrease by approximately 1.3 percent, which it considers "small" and offset by the "national" names of hotels. Without any backup, NYSDOT says the use of smart phone wayfinding reduces hotel dependency on capturing trips through visual recognition from highways. These examples reiterated that NYSDOT using speculative assumption, touting increases in economic development when convenient, but not accounting for it in the DEIS data.

Destiny USA and tourism more generally are one sector of Syracuse's broader economy. If so many assumptions and speculative or conclusory statements were made for this economic segment, it is likely other economic segments have been glanced over as well – this is not the

hard look required for a major infrastructure project's DEIS. Destiny USA, hotels, and tourism have all been impacted by the restrictions necessitated by the COVID-19 pandemic. Improperly analyzing the traffic impacts and potential consequences to these crucial Syracuse area businesses could have grave ramifications.

- R 9-362: The DDR/DEIS and FDR/FEIS in **Section 6-3-2** consider the potential beneficial and adverse effects of the Project alternatives on the local and regional economies, including tourism-related sectors, and the analyses are consistent with the requirements of CEQ NEPA regulations. Please see responses to Comments **7-52** and **7-53** in **Section 7** of this appendix for a detailed discussion of the evaluation of potential impacts to hotels and Destiny USA. The analysis in **Section 6-3-2** of the DDR/DEIS and FDR/FEIS found that the Community Grid Alternative would not substantively diminish the ability of hotels between I-690 and the I-481 northern interchange to attract visitors that value convenience and easy and direct access to I-81 or the entire Syracuse and Onondaga County region. For those travelers intending to stay in the Syracuse area, this area will continue to be immediately proximate to I-90 and the airport. For travelers arriving from points north or south of the I-481 interchange, and/or for those intending to travel further on I-81 after their stay, the difference in travel times between the I-81 and BL 81 under the Community Grid Alternative would be 5 minutes or less, which is not a large enough difference to alter travel decisions for a vast majority of out-of-town guests. Travelers can be expected to continue to stay at these hotels because the de minimis change in travel time between I-81 and BL 81 would have no effect on the overarching reason that the traveler chooses to visit the Syracuse area or to stay at a particular hotel, which can be attributed to proximity to an attraction (e.g., Destiny USA or the planned aquarium at the Inner Harbor) or airport, cost, amenities, and brand loyalty. Travel time changes would not substantially alter consumer behavior and capture rates within Destiny USA's consumer trade areas. There are no comparable retail and entertainment offerings within a closer drive time, and many consumer trips occur outside peak commuting hours so that most regular Destiny USA visitors would see little to no difference in travel time. In addition, regular consumers who do experience incremental travel delay will likely adjust their trip frequency (e.g., shop longer less often) or adjust their trip times to avoid more congested periods. The Project's effects on travel times are not anticipated to lead to increases in online purchasing; most consumers frequenting Destiny USA already have online shopping available to them; they frequent Destiny USA for the unique retail and entertainment experiences that it offers. The desire for that experience is not expected to notably change due to minor increases in travel time. This FDR/FEIS states that some highway-dependent uses near Interchange 25 could be vulnerable to lost revenues as a result of the diversion of some traffic to I-481 (future I-81). Refer to **Section 6-3-2.4.3** and **Appendix D-2** for more information.

Consideration of potential economic benefits includes analyses of potential induced growth resulting from the alternatives; as detailed in **Section 6-3-2**, this could include new highway-oriented investment along the existing I-481 corridor. However, consistent with CEQ practice, potentially induced development is not included as background projects for analysis in the DDR/DEIS and FDR/FEIS. Consideration of potential adverse economic effects includes analysis of potential indirect business displacement at locations where changes in travel

patterns could alter consumer spending. The economic analyses in **Section 6-3-2** do not speculate as to the long-term market effects of the Covid pandemic during operating conditions for Project alternatives (i.e., 2026 forward).

The DDR/DEIS and FDR/FEIS consider the potential economic effects on construction activities associated with Project alternatives. As detailed in **Section 6-3-2**, construction of the Community Grid Alternative would last approximately five years and could result in adverse effects to businesses due to temporary lane and/or road closures that could impede access by customers and/or workers, including drivers, pedestrians, and bicyclists. **Table 4-7 of Chapter 4, Construction Means and Methods** identifies measures to mitigate adverse effects to businesses during construction, including temporary business signs to identify business entrances and to direct customers to businesses that would be affected by detours. Short-term benefits to the Project Area would occur during the construction phase of the Project in the form of increased demand for local materials, services, and labor. The short-term increases in employment would be expected to filter through the regional and local economies, generating consumer and business spending. Some of the additional spending within the regional and local economies would be expected from contractors, sub-contractors, and employees, and would be in the form of additional retail and entertainment sales, food and beverage, and hotel stays.

- C 9-363: NYSDOT has spent years promoting its preferred alternative without truly listening to the concerns of the citizens impacted by this project both within the City of Syracuse and the surrounding suburbs. There is substantial concern that the 481 Bypass/Community Grid has largely disregarded potential impacts on the suburbs. There is also a genuine concern that, for the City of Syracuse, the 481 Bypass/Community Grid will simply bring a highway to street level and repeat the sins of past generations.
- R 9-363: NYSDOT and FHWA have given consideration to all input received regarding advantages and disadvantages of the Community Grid Alternative and has carefully considered the potential social, economic, and environmental effects of the Community Grid Alternative, which have been presented the DDR/DEIS and FDR/FEIS.
- C 9-364: The DEIS conducts a cursory review of suburban areas, including the I-481 East Study Area which would have substantial additional traffic under the 481 Bypass/Community Grid. A large volume of traffic would now travel through the heart of DeWitt as a result of the expansion of a major intersection in this small village, causing an increase in volume that will more than double. NYSDOT has said these communities would not qualify for sound barriers or other remediation due to low population density. However, no adequate studies were conducted in suburban communities such as DeWitt for noise, sound, or emissions, including from idling traffic which is likely to increase on Route 92 and in the Pickwick neighborhood.
- R 9-364: The DDR/DEIS and FDR/FEIS provides an analysis of potential traffic, noise, and air quality impacts in the Town of DeWitt. The potential for air quality impacts due to localized roadway conditions was analyzed in **Section 6-4-4.4.1** of the DDR/DEIS and FDR/FEIS for the

Community Grid Alternative. As discussed in the DDR/DEIS and FDR/FEIS, project pollutant concentrations would be below the appropriate National Ambient Air Quality Standards (NAAQS) and would not be substantially different from concentrations projected under the No Build Alternative, as the background concentrations were the dominant component in the total concentrations. As discussed in **Section 6-4-6** of the DDR/DEIS and FDR/FEIS, in accordance with FHWA's "Highway Traffic Noise Analysis and Abatement Policy and Guidance," a noise level change of 3 dB(A) or less is generally imperceptible to the human ear. Given the increase in volumes and geometric alterations, the noise models indicate that there will be approximately a 2 dBA increase in average noise levels for the DeWitt residences adjacent to I-481 during the AM peak hour. Noise abatement study areas 7, 8, 18, and 19 are in the DeWitt area. Based on NYSDOT Noise Analysis Policy, noise barriers 7B and 8B are recommended in the DeWitt Area. Please see responses to **Comments 7-88 and 7-106** for further discussion.

- C 9-365: I-81 is today a bustling connector between points south and west of Syracuse via the New York State Thruway (I-90) to the west. Removing this important central segment would inevitably divert much heavy truck traffic through Syracuse streets and rural roadways southwest of the City, imperiling small communities, narrow roadways, and the water quality of Central New York's pristine and picturesque Finger Lakes. No attention was paid to this inevitable byproduct of a Community Grid approach within the DEIS.
- R 9-365: Local routes through the Finger Lakes region have requirements for overweight or oversized permitting for truck traffic overseen by the local roadway jurisdictions, and those restrictions would not be altered as part of the Project. As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS and as shown in **Tables 5-52 and 5-53**, using results of the regional model, a comparison of traffic exiting I-81 at New York State Route 20 with the Community Grid Alternative versus the No Build Alternative indicated a negligible number of traffic diversions along this route. As part of two separate projects, NYSDOT is planning to install a roundabout in Homer at the intersection of Route 281 and 41. NYSDOT is also analyzing the installation of roundabouts in Skaneateles at the intersections of Route 20 and 41A, plus Route 20 and 41. These safety projects will encourage large trucks to utilize the interstate highways as they are better suited for carrying trucks than non-interstate systems.
- C 9-366: The DEIS misrepresents the potential for new development if the I-81 viaduct is removed. In the City of Syracuse, it remains unclear how a Community Grid reconnects the area. Simply removing the existing I-81 viaduct structure will not reconnect the area. Community connectivity results from so much more than simply taking down the viaduct. It depends on the ability of people to both live and work within the community. A concrete land use plan is needed. The Land Acquisition, Displacement, and Relocation strategy outlined in the DEIS is scattered and does not result in any meaningful change or reconnection of the community. On the contrary, the I-481 Bypass/Grid bifurcates Syracuse from the Lakefront Area, Fairgrounds, amphitheater, Amtrak station, and Syracuse Hancock International Airport.

NYSDOT represents that the I-481 Bypass/Community Grid will result in newly available land for development. Such a statement is unfounded. This plan incorporates (i.e., takes) 20.44 acres of land to create the I-481 Bypass/Grid, but results in a purported 10 to 12.5 acres of, “surplus transportation right-of-way,” that could be converted to another use. However, the 10-12 acres that would become available for development under the Community Grid are not providing a critical mass. In reality, they are spread around throughout the Study Area in several parcels, including some next to existing homes and others next to an elementary school. The so-called benefit from having this “new” land lacks market potential for development at best, and more likely, could result in a highway at street level with lower income communities bearing the brunt of the impacts. Instead of these unreasonable assumptions of future development, NYSDOT should be investing the money it proposes to widen/improve a bypass around Syracuse into Syracuse itself.

As seen in DEIS Figure 6-2-1-12, the surplus parcels are scattered within a wide area. In Area A, 8 sites would be available, the smallest being 0.2 acres and the largest being 1.7 acres. Of those sites, four are highly irregular shapes and could present challenges for development. In Area B, two sites would be available, one measuring one acre, the other measuring 3.5 acres. These parcels are again extremely irregular, with the one-acre site being long and narrow. Neither parcel is contiguous with the other, with Martin Luther King Blvd. East bifurcating the sites. In Area C, two sites would be available, one measuring 0.75 acres, the other measuring 1.5 acres. Neither parcel is contiguous, multiple streets run between the two areas. Additionally, the 0.75-acre parcel is triangular and may present challenges for development.

Even if NYSDOT's goal is to reconnect streets and unify communities, nothing in the DEIS suggests that outcome would result. NYSDOT cannot simply assume tearing down I-81 will result in a unified community – which is what they have done. It remains unclear how the extremely wide, multi-lane Community Grid could be considered a pedestrian-friendly, unifying environment. How would “walk signals” be timed, especially during peak vehicle and pedestrian travel times? Will it take multiple minutes to cross the street? Will there be adequate pedestrian protections from the anticipated 18-wheel trucks that will use the new Grid? Other projects in New York demonstrate the likely unanticipated consequences of moving heavy traffic from a limited-access facility to several neighborhood streets.

Other projects have promised the same community benefits that NYSDOT claims will result from tearing down the I-81 Viaduct but, following millions of dollars of planning and construction, have failed to deliver on those promises.

Consider the I-895/Sheridan Expressway project. In 2019, the Sheridan was turned into a boulevard as part of an “enhancement project” to connect the surrounding neighborhood to waterfront areas. However, in reality, the agency created a ground-level highway that experiences heavy traffic and is difficult to traverse. This new ground-level highway measures approximately 160 feet at the widest points and is elsewhere generally 100 feet across. By simply removing a highway and bringing traffic to the street level, NYSDOT is not bridging a community but simply running high volumes of traffic through a residential area. Even with a

30 mph speed limit, the volume of traffic and time of idling becomes an issue from an air quality and pedestrian perspective.

Other urban areas have removed highways and created urban boulevards, each with varying levels of success but none truly similar to the proposal to tear down a heavily used portion of a mainline, two-digit Interstate facility, as is the case here. In the District of Columbia, for example, a portion of I-295 was removed and turned into an urban boulevard. However, this portion of I-295 was not acting as a heavily used interstate like I-81. In Milwaukee, the Park East Freeway was removed in 2002 and 2003. Unlike Syracuse's I-81 project, the Park East freeway was a lightly used, dead-end spur that was physically proximate to a larger facility with ample capacity. In addition, the Milwaukee project resulted in a gain of almost thirty acres of prime downtown real estate and \$1 billion in private investment. The I-481 Bypass/Community Grid would result in only a fraction of acreage becoming available and dispersed throughout the Study Area. The I-481 Bypass/Community Grid would also require rerouting to a distant highway that requires substantial updates to address capacity. It is therefore unlikely to create development similar to Milwaukee. In Baltimore, a portion of highway was removed and turned into a boulevard, however this was again a short spur that ultimately terminated in a town outside Baltimore City and did not connect to other major highways or serve as a major route. In sum, none of these removals are factually similar to what New York State seeks to propose with respect to I-81. Rather, the converted segments involved shorter urban spurs or incomplete segments of the Interstate, as compared to the heavily-used, major urban throughway like I-81.

- R 9-366: The Community Grid Alternative would not eliminate the I-81 route through the city; rather, it would be converted to BL 81, which for most of its length would operate as a high-speed, controlled access freeway that would continue to function much like an interstate, with the exception of the segment between Colvin Street and I-690, which would function as an urban arterial. This design would promote north-south connectivity and, in conjunction with proposed improvements to many of the east-west streets, would also improve east-west connectivity. The conversion of I-481 to I-81 with its associated improvements also would provide a high-speed route connecting to the city and surrounding areas. Enhanced connectivity also would be realized through improved pedestrian and bicycle facilities along BL 81/Almond Street. Pedestrian signals would be timed such that pedestrians would generally be able to cross BL 81/Almond Street in one signal, and curb bump-outs would shorten pedestrian crossing distances. The Community Grid Alternative would improve neighborhood cohesion in the Central Study Area by removing the viaduct structure and providing improved pedestrian and bicycle amenities and connections between Downtown/Southside and University Hill/Near Eastside neighborhoods (see **Section 6-2-1** of the DDR/DEIS and FDR/FEIS for additional information on community cohesion and connectivity).

SCHOENECK LETTER (SUBMITTED UNDER PYRAMID MANAGEMENT GROUP)

- C 9-367: As General Manager at Destiny USA, I have the following concerns. While we received the DEIS report when it was released in July 2021, neither we, nor any of our 260 tenants at

Destiny USA were asked to provide information or input or were consulted in any way. We, along with our tenants, understand our business in depth and closely track where our guests are traveling from across a wide spectrum of avenues using tenant sales data and tracking tools such as Placer.ai.

Here are five different sources of data (all from the pre-COVID 2019 timeframe) that clearly demonstrate the bulk of our visitors coming to Destiny USA travel from long distances and a very large share of which rely on Interstate 81 for convenient access – something that is significantly underestimated in the NYSDOT report.

- Zip Codes Collected from Destiny USA Guests Who Used Destiny USA 's Free on-site WiFi Jan. 1 - Dec. 31, 2019;
- Google Analytics Analysis of DestinyUSA.com's Users Home Locations Conducted for Destiny USA from Jan. 1 - Dec. 31, 2019;
- Placer.ai Heat Map Showing the Home Location of the Mobile Devices of Destiny USA Visitors. (2019; Placer.ai is the industry leader in accurate, reliable, accessible and compliant location analytics. Placer.ai analyzes shopping patterns using location data from 30 million devices; Placer.ai does not track Canadian devices);
- Zip Codes of Destiny USA Summer Fun Pass Purchasers. (Sold June - September, 2019); and
- Entertainment Tenant #1 Zip Codes Collected from Guests Who Purchased Admission Tickets in 2019.

R 9-367: NYSDOT has met with representatives of Destiny USA throughout development of the EIS to solicit their input. Multiple opportunities for public comment have been available throughout the EIS, including the 90-day public comment period for the DDR/DEIS.

C 9-368: Based on what we and our tenants know about where our guests come from and through independent analysis by Placer.ai, it is clear the DEIS analysis was fundamentally flawed. Consider the following:

1. NYSDOT's estimated 69.1 percent of Destiny USA's visitors come from inside Onondaga County and more specifically within the I-481 corridor; yet our multiple data sources show that, in fact, over 60 percent of our guests are coming from outside of Onondaga County.
2. The DEIS projects only 8.3 percent of day trips to Destiny USA from I-81 South of I-481 and I-81 North of I-481. Independent analysis from Placer.ai determines that of major highway access routes to Destiny USA, 26.8 percent of visits are from I-81 South of I-481 and I-81 North of I-481 (13.2 percent and 13.6 percent, respectively).
3. Based on the NYSDOT's flawed approach, its "total reduction in customers" could not be accurate and significantly underestimates the total impact of decommissioning this important section of I-81.

- R 9-368: The DDR/DEIS analysis, which relies in part on StreetLight data, does not conflict with the independent analysis and data provided by the commenter.² The DDR/DEIS analysis estimates that 69.1 percent of visitor trips come from inside Onondaga County; this is different than the geographic distribution of Destiny USA's overall visitor base. Those living within closer proximity to Destiny USA are more likely to visit Destiny USA more frequently than those living farther away; the data presented by the commenters presents data on individual customers, without recognizing the trip frequency of those customers. With respect to the Placer.ai data, the percentages presented in the graphic submitted are for visits to Destiny USA via the major highways surrounding Destiny USA, and does not appear to include trips arriving at Destiny USA from the local road network, or those trips arriving by I-81 from residences located within the I-481 interchanges, such as from North Syracuse.
- C 9-369: For five decades, Pyramid has been developing shopping centers and other complex properties, choosing locations like Destiny USA specifically for their superior highway access and visibility. By design and of utmost importance to the 260 businesses and 5,000+ employees that work the property, Destiny USA is conveniently located in the center of New York State adjacent to Interstate 81, less than 10-minutes from Syracuse Hancock International Airport and the New York State Thruway. Syracuse is within a 350-mile radius of every major City in the Northeast and includes a population of more than 75 million people. Major target markets within this area include Eastern Canada, regional tourists, university students and all regional residents. The existing complex of major roadways make Syracuse and Destiny USA a prime overnight location for guests traveling between New York City to Niagara Falls and Canada. As a major regional attraction, the overwhelming majority of Destiny USA's visitors reach the property through some combination of highway access, with I-81 being the predominate route guests take from the north and south. The proposed traffic diversion around Destiny USA to Interstate 481 would negatively impact accessibility, visibility, and visitation to Destiny USA.
- R 9-369: With the Community Grid Alternative, Destiny USA would continue to be conveniently located in the center of New York State and less than 10 minutes from Syracuse Hancock International Airport and the New York State Thruway, and Syracuse would continue to be within a 350-mile radius of every major City in the Northeast. As detailed in **Section 6-3-2**, Destiny USA is a major regional destination that does not rely heavily on pass-through traffic; the estimated 0- to 6-minute increases in travel times to Destiny USA from some locations is not expected to deter guests with intended trips to Destiny USA.
- C 9-370: Destiny USA has worked closely with the New York State Tourism and Visit Syracuse organizations to attract out of town visitors including Canadians and International tourists.

² StreetLight data is an on-demand mobility analytics platform that takes and analyzes vehicle movements using data from mobile devices, connected cars and trucks, as well as census data, road network information and more. The data includes all vehicles to/from a destination, including employees and visitors. This data was used to determine the number of trips during different periods of time and by routes to destination.

Working in collaboration with New York State, I Love NY and Visit Syracuse, Destiny USA has made tremendous strides in driving the local and State tourism economy. As the top tourist attraction in all of Central New York and the largest shopping, dining and entertainment destination in all of New York State, Destiny USA welcomes millions of visitors from across the globe on an annual basis and has made significant investments in bringing in people from further distances for longer lengths of stay. These efforts include:

- **The Central New York Welcome Center Inside Destiny USA:** in 2017, we and New York State announced the grand opening of the Central New York Welcome Center inside Destiny USA, the first of its kind built inside an attraction in New York State. The Welcome Center, one of 11 throughout the state, advances the State's commitment to continue growing the state's tourism industry by promoting local attractions, food and beverage producers, and the region's agritourism destinations. The Welcome Center serves as a great portal for the region and allows guests to get a flavor of all things New York State, including the robust offering of Destiny USA while on their journey.
- **Our First On-Site Hotel:** In September of 2017, Destiny USA and Embassy Suites by Hilton, a global brand of upscale, all-suite hotels from Hilton, celebrated the opening of the new onsite 209-room Embassy Suites by Hilton Syracuse-Destiny USA. Hotel construction began in June 2016, and it is the first onsite at Destiny USA, features an onsite restaurant and pool and is the go-to property for guests traveling to visit the Destiny USA international travel and tourist destination.

The hotel welcomed guests from all 50 states and 70 countries within the first two years of being open and serves as the official hotel of Syracuse Athletics and the Syracuse Mets. The hotel caters especially to traveling Canadians, who visit to shop, dine, play and stay at Destiny USA.

- **A Magnet for Canadian Shoppers:** Canadian shoppers account for 18.4% of shoppers at Destiny USA. With 60% of the Canadian population residing directly across the New York State border, Destiny USA has seen tremendous Canadian traffic over the years, with retailers often accepting Canadian currency and always many Canadian tour buses and license plates found in the parking lot.

Destiny USA actively caters to the Canadian market with unique promotions and giveaways, including a market-first "at par" stay and play package which included discounted hotel accommodations and Fun Pass at Destiny USA.

- **Motorcoach Group Visitation:** Since the expansion of Carousel Center and rebranding of Destiny USA in 2012, significant resources have been dedicated to promote the property through domestic and international trade shows and marketing. Results continue to be impressive, bringing substantial additional spending into the Central New York area. Every year, representatives of Destiny USA attend numerous trade shows, sales missions, summits and conferences with the goal of strengthening relationships with established colleagues and introducing the product and area to new operators throughout the world with the goal of encouraging future visitation from both emerging and mature markets.

Destiny USA is an economic catalyst and engine for the City of Syracuse, Onondaga County and Central New York. Destiny USA's direct economic impact can be summarized as follows:

- **Total Annual Sales Impact**
 - o \$550,000,000

- Annual Sales Tax
 - o \$38,560,885 (NYS sales tax, state and county)
- State: \$19,280,443
- County: \$12,917,897
- Syracuse City & Towns: \$6,362,546

There are countless reasons why Interstate 81 should be maintained in its present corridor. This submission speaks solely to the flaws of I-81 DEIS Section 6-3-2 LOCAL AND REGIONAL ECONOMIES.

R 9-370: Comment noted.

9-24 TRUCKING ASSOCIATION OF NEW YORK

C 9-371: The Trucking Association of New York (TANY) respectfully submits the following comments, as prepared by Quetica Consulting in response to the DEIS and Draft Section 4(f) Evaluation for the I-81 Viaduct Project. TANY has significant concerns about the preferred alternative for replacing the I-81 Viaduct through downtown Syracuse. Federal Regulations Title 23, Chapter 1, Part 658.11 requires that any request for deletion of an interstate highway must analyze the impact on interstate commerce. Upon review of the DEIS, it is clear that a complete analysis on the impacts of this project on freight activity has not been conducted. Moving forward with the preferred alternative absent the required analysis would be irresponsible and has significant economic, environmental and safety implications that have not been considered. TANY appreciates the opportunity to comment on the DEIS. Before moving forward with the preferred alternative of the Community Grid, TANY requests that a comprehensive review of the movement, routing and cost of freight/interstate commerce be evaluated.

R 9-371: I-81 would continue to function in the region, albeit for a relatively short segment to the east of its current alignment and would continue to serve both general and commercial traffic. Additionally, I-81 connections to other interstate highways (e.g., I-90 and I-690) would be maintained and numerous connections to the arterial system within Syracuse would be provided for movement of freight and passenger vehicles.

A traffic study was performed for the Project which accounts for truck traffic and expected changes in truck travel patterns. The travel demand model used for the Project is inclusive of all vehicle types including trucks. In addition, vehicle classification counts were conducted for the Project to identify truck percentages for use in the operational analyses/simulation models. Also, INRIX GPS data was used to develop truck origin-destination (O-D) trip tables through the Origin-Destination Matrix Estimation (ODME) procedure in the travel demand model to obtain the estimated truck volumes for future conditions. Since the origins/destinations do not change, the model accounts for the thousands of O-D pairs in the travel demand model areas and routes them accordingly based on the proposed changes to the roadway network. BL 81 would provide sufficient access to business in and nearby the City of Syracuse much as I-81 does today. The travel time analysis performed for the Project indicates that the Community

Grid Alternative would result in only slight increases in travel time (a few minutes at most) for some trips, while resulting in slight decreases in travel time for some other trips. The routing of the new I-81 to the east of Syracuse would add only 3.5 miles of travel for through trips compared with I-81's current alignment.

In addition, pursuant to 23 CFR 658.11, a Notice of Proposed Rulemaking (NPRM) is required for the proposed deletion of a Federal-aid interstate from the National Network and for the proposed addition of BL 81 to the National Network (**Appendix B-5** contains the Designation/De-Designation Package prepared for the Project).

C 9-372: The trucking industry is critical to the economic success of not only our nation and the State of New York but to the City of Syracuse and surrounding region as well. For that reason, TANY is deeply concerned about the Community Grid Alternative replacing the I-81 Viaduct through downtown Syracuse and is especially disappointed in the near total exclusion of commercial trucking interests and commerce in the analysis conducted for the DEIS. Federal Regulations Title 23, Chapter 1, Part 658.11 states that any request for deletion, such as the proposed deletion of a viaduct section of I-81 through Syracuse, must analyze the impact on interstate commerce.

The Community Grid Alternative will negatively impact the competitiveness of the nation and the Syracuse Region. USDOT data suggest that the majority (83 percent by volume) of the commerce on I-81 moving into, out of, or through Syracuse supports domestic trade. In addition, 2.92 million tons of foreign trade valued at \$8 billion moves across the Syracuse section of I-81 going to and from Canada.

R 9-372: I-81 would continue to function in the region to the east of its current alignment (for a relatively short section) and would continue to serve both general and commercial traffic. Additionally, I-81 connections to other interstate highways (e.g., I-90 and I-690) would be maintained and numerous connections to the arterial system within Syracuse would be provided for movement of freight and passenger vehicles. See Appendix B-5 of the DDR/DEIS and FDR/FEIS for further discussion related to highway designation and de-designation and National Network changes under the Project. Truck travel patterns are discussed in **Section 5.6.1** under the sub-section titled "Traffic Redistribution due to Removal of the I-81 Viaduct."

C 9-373: The Community Grid Alternative will result in additional vehicle miles traveled, equating to more truck emissions and more negative externalities associated with freight movements. These include (annually) 1.76 million impacted truck trips; 19.8 million additional truck miles traveled; 3.04 million gallons of diesel fuel; \$32 million in trucking costs; and \$500 thousand in monetized emission externalities from 20.5 million additional tons of hydrocarbons, NOX and fine particulate matter.

R 9-373: As discussed in **Section 6-4-4.3.1** of the DDR/DEIS and FDR/FEIS, refined regional transportation modeling was developed to estimate projected vehicle miles traveled (VMT) by vehicle type within the study area and determined that the Community Grid Alternative would result in an overall decrease of 4.2 million miles traveled in 2026 across all vehicle types and

would result in a further decrease of 5.7 million miles traveled in 2056. The changes in emissions between the No Build and the Community Grid Alternatives are driven by three inputs—the decreases in annual VMT, projected changes to traffic conditions between the alternatives (i.e., travel speed and vehicle classification) on individual road segments, and the analysis year (which would determine fleet-wide average per vehicle-mile emission rates for both alternatives). Subsequently, the decrease in annual VMT, the improvements in travel speed, as well as the predicted shift in traffic between roadways would result in decreases in annual emissions within the study area for all pollutants analyzed. Furthermore, the decreased emissions would result in avoided costs associated with emissions externalities.

- C 9-374: Underlying analysis tools completely ignore commercial vehicle traffic demands: The I-81 Challenge Website also provides numerous background reports including the travel demand model developed for SMTc. Our review of the SMTc Travel Demand Model documentation found no mention of trucks or commercial vehicles! While the model discusses non-motorized trips extensively, the model appears to completely ignore trips by large trucks. This same blind eye towards commercial interests is carried over to the DEIS.
- R 9-374: The Project's travel demand model is inclusive of all vehicle types including trucks. In addition, vehicle classification counts were conducted for the Project to identify truck percentages for use in the operational analyses/simulation models. Also, INRIX GPS data was used to develop truck origin-destination (O-D) trip tables through the Origin-Destination Matrix Estimation (ODME) procedure in the travel demand model to obtain the estimated truck volumes for future conditions.
- C 9-375: Chapter 6 of the DEIS: Social, Economic and Environmental Considerations, narrowly defines impacts on the regional economy to the retail sector.
- The Local and Regional Economies Analysis focused on (1) locations within the region where shippers and carriers would be marginally impacted or not impacted by the Viaduct Project; and (2) locations that are adjacent to or in close proximity to the Viaduct Project Priority Area as outlined in the NYSDOT Scoping Report. In fact, fewer than 3 percent of the stops in the ATRI GPS dataset were located within a 1-mile buffer of the Viaduct Project Priority Area. Furthermore, the analysis ignored the impacts to the shippers and carriers located to the west of I-81 and north of I-690 which account for half of the stops in the ATRI GPS dataset.
 - Tools and methods employed to assess the impacts and traffic operations did not consider the impacts on trucking companies or trucking dependent industries in the Syracuse area. Based on our data analysis and interviews with trucking firms operating in the Syracuse region, there are 17 trucking companies located west of the I-81/I-481 interchange that operate approximately 400 trucks daily in and through Syracuse. Half of the stops in the ATRI GPS dataset were located in these areas. It is estimated that for trucks having to reroute via I-481 and/or I-690 to get to I-81, the additional mileage added to a one-way trip is approximately 14 to 18 miles longer than the current route (up to 36 miles round trip). In 2019, results from an annual industry survey by ATRI found that the average cost per mile of operating a truck in the Northeast Region of the U.S. was \$1.844. Resulting in

added costs of approximately \$66.38 for each round trip per truck. As a result, the Community Grid Alternative will impose a significant tax on the trucking industry.

- The data source used for the Local and Regional Economies Analysis relied on StreetLight GPS data. All GPS data products are samples of the total vehicle/trip population. StreetLight's GPS truck trip data comes from location-based services (LBS) found on cell phone apps. The Federal Motor Carrier Safety Administration (FMCSA) restricts the use of all hand-held mobile devices by commercial motor vehicle drivers:
- Using a hand-held mobile phone while driving a CMV can result in driver disqualification. Penalties can be up to \$2,750 for drivers and up to \$11,000 for employers who allow or require drivers to use a hand-held communications device while driving.
- Disqualification - Multiple violations of the prohibition of using a handheld mobile phone while driving a CMV can result in a driver disqualification by FMCSA. Multiple violations of State laws prohibiting use of a mobile phone while driving a CMV is a serious traffic violation that could result in a disqualification by a State of drivers required to have a Commercial Driver's License.
- Short-haul delivery drivers and package or parcel delivery services in or near major metropolitan areas are more likely to use cell phones due to the stop and start nature of their trip legs. Most long-haul carriers employ satellite communication devices in the cab of the truck, with many banning the use of cell phones while drivers are on the road. The analysis conducted by TANY uses GPS data sourced by ATRI. The ATRI truck GPS data sample comes from carriers who employ satellite tracking devices on their power units, which is an industry standard for most large interstate carriers. As a result, the Local and Regional Economies analysis conducted for the Community Grid Alternative suffers from an inherent data bias that mostly excludes the interstate trucking sector.

R 9-375: As discussed in response to **Comment 9-371**, the travel time analysis performed for the Project, which includes all vehicle types including trucks, indicates that the Community Grid Alternative would result in only slight increases in travel time (a few minutes at most) for some trips, while resulting in slight decreases in travel time for some other trips. The routing of the new I-81 to the east of Syracuse would add only 3.5 miles of travel for through trips compared with I-81's current alignment. Trucks would have multiple, shorter routes and logical paths available to them than presented by the Commenter. For instance, BL 81 (along I-81's existing alignment) would still remain available for through trips traveling east-to-south or north-to-west.

The StreetLight GPS data used for the project is derived from mobile phone applications as well as in-vehicle navigation GPS. INRIX, the GPS data supplier provides data sourced from commercial fleet navigation systems. StreetLight follows a data post processing methodology to separate commercial trucks from passenger vehicles. In completing the economic analyses, the vehicle classification filters available in the StreetLight platform were applied to differentiate the origin-destination trip patterns of passenger cars and commercial trucks.

C 9-376: The Federal Highway Administration (FHWA), NYSDOT and SMTC ignored USDOT guidance on engaging the private sector in the planning process: The NYSDOT I-81 Viaduct Project Website discusses the Corridor Study Report and refers readers to the I-81 Challenge

website. That website discusses a public involvement process designed to be as “inclusive as possible” yet commercial interests, especially the trucking industry appear to have largely been ignored and overlooked in the final evaluation process. For example, early in the study process focus groups were used to identify key study activities and metrics going forward, when asked:

- What other community stakeholders should be engaged in the I-81 study process? Trucking companies is prominently listed, however there is no indication that the study made any effort to explicitly include the trucking companies in its follow-up engagement efforts.
- What impacts should be evaluated? Freight Businesses (e.g., mileage and travel time) is listed third, however the final DEIS does not adequately assess the overarching impacts to the freight industry, including trucking costs associated with additional travel times, truck parking and services such as the impacts to the Pilot Travel Center.

Furthermore, detailed discussions with freight industry reps, who could enlighten the evaluation team as to the direct and indirect impacts to the industry were inadequate in that a clear understanding as to the fiscal and functional impacts to this mobile industry WAS NOT evaluated. The following excerpts are from the July 2021 EXECUTIVE SUMMARY (PIN 3501.60 S-1) S.2 PROJECT PURPOSE, NEEDS, GOALS, AND OBJECTIVES. Review of these key framework components of the study reveal little consideration for freight related impacts and affects:

- The need to improve traffic flow and safety
- The need to address aging infrastructure
- The need for transportation infrastructure to support long-range planning efforts
- The need to improve pedestrian and bicycle infrastructure
- The need for improved transit amenities
- Improve safety and create an efficient regional and local transportation system within and through greater Syracuse
- Provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse

While the aforementioned purpose, needs, goals and objectives are consistent with sound project evaluation, it is important to note that FREIGHT is not specifically included in any of the I-81 DEIS project purpose, needs, goals or objectives. Given the level of freight volumes and the importance of both regional and long-distance freight activity, including international trade, addressing freight impacts specifically is an oversight and shortcoming of the DEIS.

R 9-376: NYSDOT met with the New York State Motor Trucking Association on July 25, 2016 to review the I-81 Viaduct Project and discuss truck travel times, truck routing, and to listen to trucking concerns. Extensive public engagement opportunities have been provided for the Project for stakeholders, businesses, trucking companies, and the general public.

Section 6-3-2 of the DDR/DEIS and FDR/FEIS presents an assessment of potential beneficial and adverse effects of the Project alternatives, including potential effects of rerouting freight

(trucking) trips, on the local and regional economies. As detailed in **Section 6-3-2**, the Community Grid Alternative may increase travel time for some freight trips. For the most part, the greatest change (4 to 6 minutes) would be for trucks with origins or destinations in the Central Study Area. As these are trips to and from specific locations, the change in travel time would not substantially impact freight operations in the Central Study Area. There would be less change in travel time to other freight hubs. Further, the alternatives were designed to provide adequate traffic capacity and safety for all vehicle types, including trucks. Overall, the Community Grid Alternative would not impede freight movement in the study area.

The DDR/DEIS and FDR/FEIS (see **Section 6-3-2**) examines the potential effects of the project alternatives on the local and regional economies. The analyses find that the projected changes in travel times would not have substantial adverse effects on the local or regional economies. For a discussion of the Pilot Travel Center, see **Section 6-3-2.4** of the FDR/FEIS.

C 9-377: The I-81 DEIS completely ignores safety issues like truck parking. TANY finds it unconscionable that despite years of study by SMTC and NYSDOT into the impacts of removing a segment of the Interstate Highway System in a metropolitan area, that no effort has been made to examine the issue of truck parking in the Syracuse Area. The Community Grid Alternative will add drive time for truck drivers making pick-ups or deliveries to the Syracuse downtown areas or area west of downtown and interstate truck drivers are regulated by federal hours of service limits. The additional time required for making deliveries, staging for delivery windows in a less reliable drive time environment will increase the demand for truck parking in Syracuse under the Community Grid Alternative.

R 9-377: The travel time analysis performed for the Project indicates that the Community Grid Alternative would result in only slight increases in travel time (a few minutes at most) for some trips, while resulting in slight decreases in travel time for some other trips. Additionally, the Project does not remove or relocate any existing truck stops or rest areas in the region, and the routing of the new I-81 to the east of Syracuse would add only an additional 3.5 miles of travel for through trips compared to I-81's current alignment. Truck drivers choosing to make deliveries or pickups within Syracuse will be able to utilize BL 81 (along the alignment of the existing I-81), which will remain a freeway north of I-690 and south of MLK, Jr. East.

C 9-378: What is the estimated share of truck trips using I-81 to access impacted businesses in the Syracuse region? The share of truck trips using I-81 to either originate a freight trip or arrive at a destination for deliveries is an important component of the overall freight truck levels. However, not all areas within the Syracuse region will be impacted equally by the I-81 Viaduct Project.

What percentage of truck trips utilizing the I-81 Corridor are the result of accessing parcels in close proximity to the I-81 Viaduct Project Priority Area? These local or downtown and central business district related origins/destinations using I-81 have been the focus of previous analysis. Downtown interchanges and alternate routes will be required for these businesses to service their clients.

What is the estimated impact to local businesses using the I-81 Corridor in terms of additional mileage and fuel consumption on an annual basis? Rerouting deliveries and freight movements for businesses in the region will increase their number of truck miles traveled and costs to do so. It will also increase their consumption of diesel fuel and associated emissions.

What is the estimated impact to through traffic using the I-81 Corridor in terms of additional mileage and fuel consumption on an annual basis? Just like the impacts on local businesses, what will be the monetary impact to freight moving through the region?

R 9-378: NYSDOT did not identify specific shares of trucks using the I-81 viaduct to access businesses in the Syracuse region and again for businesses within the City of Syracuse. However, the Project's travel demand model is inclusive of all vehicle types including trucks. In addition, vehicle classification counts were conducted for the Project to identify truck percentages for use in the operational analyses/simulation models. Also, INRIX GPS data was used to develop truck origin-destination (O-D) trip tables through the Origin-Destination Matrix Estimation (ODME) procedure in the travel demand model to obtain the estimated truck volumes for future conditions. Since the origins/destinations do not change, the model accounts for the thousands of O-D pairs in the travel demand model areas and routes them accordingly based on the proposed changes to the roadway network. BL 81 would provide sufficient access to business in and nearby the City of Syracuse much as I-81 does today. Also, the travel time analysis performed for the Project indicates that the Community Grid Alternative would result in only slight increases in travel time (a few minutes at most) for some trips, while resulting in slight decreases in travel time for some other trips. Additionally, the routing of the new I-81 to the east of Syracuse would add only 3.5 miles of travel for through trips compared to I-81's current alignment.

C 9-379: To better understand the flow of commerce through the I-81 corridor, the analysis begins with an examination of USDOT Freight Analysis Framework-5 (FAF-5) commodity flow data. FAF-5 is produced by the FHWA and is derived from the Commodity Flow Survey (CFS) conducted every five years by the Census Bureau and Bureau of Transportation Statistics. The 43 commodities represented in FAF are categorized using the Standard Classification of Transported Goods (SCTG) at the two-digit level.

A weakness of FAF data is its lack of geographic detail. To address this weakness a linear regression approach was used to assign 43 commodity groups to the county-level, and specifically examine the goods moving into, out of and within Onondaga County. The FAF disaggregation process uses employment with other public data exhibiting strong correlations to either production or attraction functions for specific commodity groups. A goal of this analysis is to understand the importance of the I-81 corridor in moving goods in and out of the Syracuse region, and what products are most important from a transportation standpoint to the region.

The scope of the freight flow analysis includes the following flow types:

1. Those originating and terminating in Onondaga County
2. Those originating in Onondaga County and terminating in a southern county

3. Those originating in Onondaga County and terminating in a northern county

4. Those originating in a southern county and terminating in a northern county

5. Those originating in a northern county and terminating in a southern county

The total estimated annual flow of freight utilizing the I-81 Corridor in and through Syracuse is 17.3 million tons of goods, with an estimated value exceeding \$24.5 billion.

The majority (83 percent by volume) of the commerce on I-81 moving into, out of or through Syracuse supports domestic trade. Of the foreign trade using the I-81 corridor in Syracuse, imports (1.72 million tons) slightly outweigh exports to (1.2 million tons). Imports were valued at \$4.2 billion and exports at \$3.8 billion.

Commodities related to base manufacturing accounted for the largest share of corridor flows by volume with nearly 5.5 million tons. Just under 3.3 million tons was associated with through traffic. Food products totaled roughly 4 million tons. Forestry and paper products totaled almost 2.5 million tons while petroleum and coal products totaled nearly 1.98 million tons.

In terms of commodity group flows by value, finished manufactured products account for roughly 54 percent of all corridor flow value worth \$13.3 billion. Food products (17 percent) and base manufactured products (16 percent) represented the second and third most valued group of commodities.

Flows of both Other Foodstuffs and Gravel totaled more than 2 million tons with the former surpassing 2.5 million tons and the latter 2.2 million tons. Flows of Waste/Scrap totaled nearly 1.3 million tons while non-metallic mineral products exceeded 1.18 million tons.

In terms of value, both Miscellaneous Manufactured Products and Mixed Freight exceeded \$2.5 billion while other foodstuffs totaled just under \$2.5 billion. A number of commodity types exceeded \$1 billion in value including Machinery (\$1.9 billion), Textiles/Leather (\$1.4 billion), Electronics (\$1.3 billion), Motorized Vehicles (\$1.1 billion), Pharmaceuticals (\$1.05 billion), and Articles of Base Metal (\$1.04 billion).

R 9-379: Comment noted.

C 9-380: Our review of the I-81 DEIS Section 6-3-2 found that the analysis seemingly avoids examining the impacts on the trucking industry and freight dependent industries such as manufacturing and construction, and instead focuses very narrowly on retail-related activity.

On DEIS p. 6-142: "Indirect business displacement is the involuntary displacement of businesses that results from a change in economic conditions created by a project. Not all businesses are vulnerable to indirect displacement as a result of changes in traffic patterns; the potential effects on any individual business are dependent upon the specific characteristics of the business, as well as scale of change within a business' consumer trade area." Specific to the Community Grid Alternative, these types of business were identified as warranting assessment. Those businesses being dependent upon specific types and/or volumes of consumer traffic, such as those dependent upon pass-by traffic; sensitive to drive-time changes, changes in the volume of local consumer base within a business' trade areas;

and/or particularly sensitive to changes in workforce availability or changes in supply chain dynamics.

Based on TANY's data analysis and interviews with trucking firms operating in the Syracuse Region, there are 17 trucking companies located west of the I-81/I-481 interchange that operate approximately 400 trucks on a daily basis. It is estimated that for these trucks to reroute going east via I-481 or I-690 to get to I-81 south, or the reverse, the additional mileage added to a one-way trip is between 14-18 miles longer than the current route (28-36 miles round trip). In 2019, results from an annual industry survey by ATRI found that the average cost per mile of operating a truck in the Northeast Region of the U.S. was \$1.844. Resulting in added costs of approximately \$51.63 to \$66.38 for each round trip per truck. It is important to note this calculation does not include the NYS Highway Use Tax.

R 9-380: The analyses in **Section 6-3-2** utilizes data sources and methodologies appropriate for environmental analyses under NEPA and SEQRA, and the analysis in the DDR/DEIS utilized the most current demographic and business data available at the time the analyses were prepared. The analyses in **Section 6-3-2** considered both regional and local economic effects and included assessment of freight in **Section 6-3-2.1.5** Specific Business Types. Additional analysis of the movement of freight through the Project Area is also provided in **Chapter 5, Transportation and Engineering Considerations**.

C 9-381: ATRI truck GPS data were analyzed to identify trucks that utilized the I-81 corridor between May 1st and May 15th and made a stop within the Syracuse, NY region. Stop information includes a truck ID, the stop location in latitude and longitude, and the duration of the stop calculated from a start and end time. A total number of 19,272 stops were identified for 3,541 trucks. 17,305 of these stops occurred within an Onondaga County parcel. The average stop duration was 5 hours.

Not all stops would be impacted equally by the proposed I-81 Viaduct Project. For trucks that regularly utilize the I-81 Corridor to reach an origin or destination, stakeholder feedback has indicated the impact is an additional 14 to 18 miles of travel by traversing around downtown Syracuse via I-481 or I-690. Associated with those additional miles traveled are an additional 15 to 20 minutes of travel during free flow and potentially double that during AM and PM peak travel times. Thirty to forty minutes of extra travel will have a significant impact on truck drivers whose hours-of-service drive time is tracked to the minute through electronic logging devices, and the supply chains they support. The alternative to the rerouted trip around Syracuse would be a truck trip through the community grid including a traffic circle, nearly 20 traffic signals, and a series of turns to get back to I-81.

For example, shippers in the north and northwest portions of the Syracuse region, as well as trucks completing through trips to and from the west of Syracuse utilizing I-90, would be most impacted by the loss of the I-81 Corridor through Syracuse. The major freight generators here could experience, on an annual basis, over 1.06 million impacted truck trips, an additional 17 million truck miles traveled in the Syracuse region, and more than 2.6 million more gallons of diesel fuel consumed. In terms of costs, companies will expend an additional \$15.7 million in

vehicle and \$11.8 million in driver costs while the region will incur more than \$431 thousand in monetized emissions from more than 17.6 tons of hydrocarbons, NOX and fine particulate matter. (The vehicle costs do not include New York State's Highway Use Tax, meaning they are conservative estimates.)

The impact on freight generators in the Solvey and Fairmount areas such as the West Rock Paperboard Mill, Syracuse Fiber, and others will depend on the travel route: either along I-481 and I-690 or along state and local roads. Both will increase congestion on the new routes.

Truck trips that travel the length of the I-81 Corridor through downtown Syracuse, either south to north or north to south past stations 330548 and 330553, would only be slightly impacted by an additional 4 miles by having to travel I-481 around Syracuse. These trips represent 692 thousand annual truck trips through the region and an additional 2.77 million miles of truck traffic and 426 thousand gallons of diesel fuel. In terms of costs, the additional travel would cost shippers and carriers \$2.56 million in commercial vehicle costs, \$1.9 million in driver costs, and \$70 thousand in monetized emissions along with the added congestion by rerouting the truck traffic from I-81 to I-481.

Truck trips that are originated or terminated within the Syracuse region east of the I-81 Corridor (those that utilize I-90, I-481, or I-690) along with those that travel into and out of the region past station 330306 via I-90 would not be impacted by the I-81 Viaduct Project other than from the additional congestion brought on by the rerouted truck traffic. Also not impacted by the project are the truck trips traveling past station 330548 on the way to pick-up or drop-off containers at CSX's intermodal terminal located south of the I-481 and I-90 interchange. The ATRI data suggests just under a quarter of the truck trips carrying intermodal containers to and from the terminal pass the southern I-81 station.

Previous analysis of impacts to shippers and truck trips have focused on those businesses in the immediate vicinity of the Viaduct and most directly impacted by the I-81 Viaduct Project. NYSDOT's I-81 Viaduct Project Scoping Report in 2015, shows the project's priority area in dashed lines beginning in its southernmost point at Martin Luther King East, Lodi Street to the east, West Street to the west, and Spencer Street to the northwest. While shippers located adjacent and in close proximity to the project will be most directly impacted by having to route through the local street grid to reach more distant interchanges, the number of these truck trips are minimal when compared to the region's total truck trips. Less than 3 percent of all truck stops made in the ATRI GPS data sample were made within a 1-mile buffer of the project's priority area. When expanded using the NYSDOT traffic count station data, the total daily truck trips to the buffered priority area totals roughly 100 stops.

- R 9-381: Peak hour travel times for key origin-destination pairs in Onondaga County are summarized in **Table 5-48**. The analysis considers the average travel time for all vehicles, including commercial trucks. The results indicate travel times under the Community Grid Alternative are largely similar to the No Build for most O-D pairs with the largest increases ranging from 5 to 6 minutes. The travel times are based on the route which requires the least travel time. For example, connecting the points west and south of the City, the shortest route by travel time

passes through the local street network through downtown Syracuse to make the connection from I-690 to I-81. The Community Grid alternative would provide upgrades to the local street network, BL 81 which would be designed as a Qualifying Highway to facilitate these movements for all vehicles.

C 9-382: The DEIS did not fully evaluate freight, logistics, and related industries to objectively assess the potential impacts of the I-81 decommissioning on businesses, increases in freight costs, or potential negative industry impacts. Below is an assessment of the baseline traffic related data, analyses, and findings as presented in the Appendices and chapters of the DEIS. For each of the report chapters and/or Appendices, a brief statement of findings is presented.

Appendix C-2 VISSIM Development and Calibration Report – while truck/trucks are mentioned six times in the Appendix, there are no specific evaluation numbers presented for existing or future conditions.

Appendix C-3 Traffic Volumes and Levels of Service (LOS) – neither trucks nor any vehicle classification is presented in this Appendix that allow differentiation of vehicle types for either existing or future conditions.

Appendix D-2 Economic Considerations – while truck(s/ing) is mentioned 35 times in this Appendix, the references are related to the Pilot Truck Stop or to truck related economic impacts being minimal such as, “Overall, the Community Grid Alternative would not impede freight movement in the study area.

R 9-382: Comment noted.

C 9-383: Appendix M-5 Responses to Comments Received – The following are truck-related references contained in the responses to comments received at various forums, etc. While truck(s/ing) is referenced 54 times in the document, most are related to limiting trucks on local streets and mitigation for potential increases. However, below are several pertinent references to truck(s/ing) including comments (C) and official responses (R).

C 3-58: In addition to constructing high speed exit ramps, clarify what other changes will be required to bring I-481 up to FHWA standards. Lower speed limit for commercial vehicles/truck only lane for I-481. Maintain condition of I-481, including snow management and removal.

R 3-58: The conversion of I-481 to I-81 is based on a 70-mph design speed, and the highway would have a posted speed limit of 65 mph. Topography and traffic volumes do not warrant a separate truck only lane or truck only speed limit. Most geometric elements would meet NYSDOT and FHWA freeway design standards. Appendix A-3 in this DDR/DEIS lists nonstandard features, which are subject to review and approval by FHWA.

The NYSDOT and FHWA criteria used to determine applicable design standards for all the various highways and streets within the Project Area are listed in Sections 5.4.2 and 5.4.3. The design criteria consist of 11 critical design elements and other design parameters. These include recommended design elements, such as ramp lengths, ramp spacing, storm drainage criteria, etc. The shoulder criteria are established to address a number of considerations, including safety, vehicle breakdowns, and snow management.

C 5-64: There will be added fuel costs for drivers and for trucking, companies with the re-routing of I-81 under the Community Grid Alternative. The additional mileage will also increase insurance rates for truckers. With the Community Grid Alternative, fuel consumption and related air quality impacts would be much higher because fuel consumption rates are higher for vehicles in slow traffic than on highways.

R 5-64: This DDR/DEIS includes an analysis of the Community Grid Alternative, which accounts for changes in travel patterns for trucks, and this DDR/DEIS does not identify any adverse effects on air quality. The effects of the Community Grid Alternative on freight movement are addressed in Section 6-3-2.4.1, and the analysis did not conclude that there would be adverse effects to their continued operations.

C 6-16: Input should be sought from emergency responders and trucking companies. They should be provided a question-and-answer period.

R 6-16: NYSDOT has met with emergency responders and trucking companies and has incorporated their feedback into the design of the alternatives.

C 6-32: Work with community partners to address concerns about truck traffic.

- Mitigate issues related to truck traffic in the western towns; on City streets; in the towns along I-481, as truck traffic shifts east to access the enhanced CSX terminal in DeWitt; and encourage more shipments to travel by train.
- Develop a comprehensive rail and freight plan for the region.
- Transfer ownership of certain State routes to the county or locality, enabling them to regulate truck traffic.

R 6-32: To the extent feasible, the Project would mitigate traffic impacts, including truck impacts. A comprehensive rail and freight plan for the region is beyond the scope of this Project, but could be considered as a potential Syracuse Metropolitan Transportation Council Unified Planning Work Program study in the future. In the context of a future study, the feasibility of transferring jurisdiction of certain State routes to the county or local town, enabling them to regulate truck traffic, could be examined.

As demonstrated in the beforementioned referenced meeting comments and subsequent I-81 Viaduct Team responses, the lack of sound and comprehensive evaluation of the freight-related impacts associated with the I-81 Viaduct project is evident. The industry, while supportive of improved and safe infrastructure, as it is our workplace, feels additional freight-related considerations need to be made to fully address future impacts to the industry and the local, regional, state and national economies as well, which depend on the freight industry.

R 9-383: Comment noted.

C 9-384: TANY's review of the associated documents revealed that the DEIS was prepared with a significantly affected industry not fully considered. The I-81 DEIS did not follow federal statutes and guidance to fully consider the impacts of the freight industry and, more specifically, interstate commerce or commercial motor vehicles which is a critical component of interstates' role to facilitate interstate commerce (see below).

§ 658.11 Additions, deletions, exceptions, and restrictions.

(d) Deletions and use restrictions - Federal-aid interstate.

(1) The deletion of, or imposition of use restrictions on, any specific segment of the Interstate Highway System on the National Network, except as otherwise provided in this part

(2) The justification accompanying a request shall be based on the following:

(i) Analysis of evidence of safety problems supporting the deletion or restriction as identified in § 658.11(c).

(ii) Analysis of the impact on interstate commerce.

(iii) Analysis and recommendation of any alternative routes that can safely accommodate commercial motor vehicles of the dimensions and configurations described in §§ 658.13 and 658.15 and serve the area in which such segment is located.

(iv) Evidence of consultation with the local governments in which the segment is located as well as the Governor or the Governor's authorized representative of any adjacent State that might be directly affected by such a deletion or restriction.

To understand the impact to interstate commerce, a comprehensive understanding of the movement, routing and cost of freight/interstate commerce must be evaluated, and our review suggests this evaluation did not occur. In addition, the overarching environmental impacts to air quality from higher concentrations of motor vehicles, including trucks, to both the Downtown Syracuse as well as the new I-81 (former I-481) segments was not fully considered, especially given the recent changes in freight movement/delivery during the COVID-19 pandemic, which will likely continue in the future.

R 9-384: The Project's travel demand model is inclusive of all vehicle types including trucks. In addition, vehicle classification counts were conducted for the Project to identify truck percentages for use in the operational analyses/simulation models. Also, INRIX GPS data was used to develop truck origin-destination (O-D) trip tables through the Origin-Destination Matrix Estimation (ODME) procedure in the travel demand model to obtain the estimated truck volumes for future conditions. The air quality analysis is based on the appropriate traffic data for future conditions. Refer to **Section 6-4-4** of the FDR/FEIS for more information about the Project's air quality analysis and **Appendix B-5** of the FDR/FEIS regarding the Syracuse freight roadway network. In addition, pursuant to 23 CFR 658.11, a Notice of Proposed Rulemaking (NPRM) is required for the proposed deletion of a Federal-aid interstate from the National Network and for the proposed addition of BL 81 to the National Network (**Appendix B-5** contains the Designation/De-Designation Package prepared for the Project).

9-25 NORTHSIDE BUSINESS PARTNERSHIP

C 9-385: The Northside Business Partnership, consisting of a membership of 53 businesses throughout the neighborhood, offers its support of the Community Grid. As our members are businesses of all sizes and types, we recognize the importance of a balanced, well-designed, and accessible transportation system to meet the needs of our community and those who patronize our establishments. Although work remains to be done to refine the Community Grid to be the best it can be for Syracuse and Central New York, as well as a model for other communities across the county, we feel the Community Grid alternative is the right one. It not only provides for the transportation needs of our community but it also preserves several

historic buildings in our neighborhood, buildings that house several businesses, organizations, and residents while also being integral to the North Salina Street National Historic District. We appreciate that NYSDOT has been listening to community concerns and the work done to incorporate this feedback into the project. We encourage it to continue to do so as the NEPA process moves toward the Record of Decision. We believe this will lead to a better outcome for the project in terms of the overall transportation system and the impact it has on the surrounding neighborhoods.

R 9-385: As stated in **Section 8.3** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative has been identified as the Preferred Alternative for the I-81 Viaduct Project.

C 9-386: Without proper planning and coordination to support small businesses in the Northside, a multi-year road reconstruction project will hurt these businesses. We would like to see those impacts lessened whenever possible including:

- A clearer understanding of how NYSDOT and its contractors plan to give ample warning to businesses for activities impacting them and their customers.
- The ability to help shape the project's construction schedule to reduce negative impacts on small businesses via open, two-way communication channels with NYSDOT and their contractors.
- Opportunity to have "open during construction" signs for businesses installed at critical locations throughout the Northside.

R 9-386: NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan, the specifics cannot be stated at this time. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation. At a minimum, the plan would include establishment of a centrally located, on-site project outreach office; establishment of a telephone hotline; a website with information about street closures, detours, nighttime construction activities, and locations and times of particularly noisy construction activities; and a specific communication schedule and procedures for providing construction status updates and other construction-related information to the general public (refer to **Section 4.5.2** for additional details). Businesses and other affected stakeholders will have access to a public information liaison, who will be provided as part of this outreach plan. Refer to **Table 4-7** re maintenance of access for businesses. Construction signs to direct traffic to businesses whose access has been modified will be provided as appropriate.

C 9-387: It is important to provide accommodations for pedestrians, transit users, and bicyclists, in addition to vehicles, during construction, a challenge highlighted during the work in some areas of the North Salina and North State Street corridors during the summer of 2021. This is especially important for people with limited mobility (i.e., those relying on wheelchairs or motorized scooters). Please provide more clarity on how these accommodations will be

provided and, in instances where there are problems during construction, who will be accountable for addressing them.

- R 9-387: Access would be provided for pedestrians, transit users, and bicyclists as well as vehicles during construction. NYSDOT would be responsible for implementing a public outreach plan during construction (see response to **Comment 9-386**).
- C 9-388: Since availability of parking will be affected during construction, please find parking solutions that prioritize maintaining parking in and around businesses for their patrons.
- R 9-388: The contractor would not be allowed to use on-street parking for their personnel. Refer to **Table 4-7** for information about shuttles during construction. NYSDOT will work with businesses to minimize impacts related to parking and access.
- C 9-389: Please consider refining the project's urban design context/elements to better interface with surrounding neighborhoods including, but not limited to, the Near Northside, Hawley Green, and Washington Square. These designs should pay particular attention to elements of the project that must be human scaled, including but not limited to sidewalks, bike infrastructure, transit amenities (bus stop shelters, signage, etc.), landscaping (street trees, plantings, etc.). It is critically important to design for the positive experience and perceptual characteristics of users waiting for a bus, walking, or bicycling as well. For many travelers in the Northside, these options may be their only viable mode of transportation.
- R 9-389: Urban design details will continue to be refined during final design.
- C 9-390: Design changes to North State Street and North Salina Street should complement the improvements the City made to North Salina Street by providing ample sidewalks, street trees, pedestrian-scaled lighting, and on-street parking.
- R 9-390: As depicted in sheets GP-CG-H10-16B and GP-CG-S79 in the plans in **Appendix A-1**, the road diet at State Street would include six-foot sidewalks and a 12-foot, two-way cycle track on the west side. Parking would be provided on both sides; however, there would be no on-street parking between Erie Boulevard and Burnet Street as there are no adjacent businesses or uses that would necessitate this parking. Street trees also would be included as part of the urban design details developed in final design. Lighting treatments would be explored during final design in cooperation with the City.
- C 9-391: NYSDOT should be designing maximum 11-foot-wide travel lanes on at-grade streets designed for vehicular travel speeds of 30 MPH, including but not limited to North Clinton, North State, and North Salina streets to encourage slower travel speeds.
- R 9-391: Lane widths are established in accordance with the NYSDOT Highway Design Manual based on the functional classification of each particular street (refer to design criteria tables in **Appendix C-6**). In those cases where there is some flexibility in the design criteria, such as

low-volume City streets, NYSDOT will work with the City to determine their appropriate width during final design while still meeting the minimum width stated in the design criteria. NYSDOT is proposing 13-foot lanes on the reconstructed North Clinton Street between Butternut and Spencer Streets; this wider width meets the minimum criteria for shared bicycle/vehicle lanes. North of Spencer Street, North Clinton would have 12-foot lane widths. On North State Street and North Salina Street, the 11-foot lane width would be maintained. 30 mph speeds would be maintained on City streets such as North Clinton, North State, and North Salina.

- C 9-392: NYSDOT's openness to returning land to the City for redevelopment, including but not limited to the former Butternut and North State Street on-ramp Right of Way (ROW). We request that the NYSDOT work as quickly and efficiently as possible to return this land to the City and empower the land use working group comprised of local stakeholders with the ability to make land use planning decisions. Please contact the Northside Business Partnership if you would like to discuss any items that impact the Northside business community.
- R 9-392: Comment noted. The DDR/DEIS and FDR/FEIS identifies the potential parcels that could result from surplus transportation right-of-way (see **Sections 6-3-2.4.3** and **6-3-2.4.4**, and associated figures).

Upon the completion of construction, NYSDOT would dispose of potential surplus transportation right-of-way in the Central Study Area in accordance with Federal and State law, or the Contractor could sell staging sites. In total, implementation of the Community Grid Alternative could result in approximately 10 to 12.5 acres of surplus transportation right-of-way, depending on how much land would be needed to accommodate the highway, sidewalk, shared use (bicycle and pedestrian) path, and other transportation features (see **Figure 6-2-1-12**). NYSDOT would determine the size and location of the parcels once construction is complete. The potential surplus transportation right-of-way would consist of several sites near Almond Street and Erie Boulevard where the I-81 and I-690 ramps would be removed; a parcel north of Erie Boulevard between McBride and Catherine Streets where the eastbound I-690 ramp from McBride Street would be removed; a parcel north of Butternut Street between BL 81 and State Street where the existing northbound I-81 entrance ramp from Butternut Street would be removed; a parcel south of Court Street between BL 81 and Sunset Avenue where the existing northbound I-81 ramp to Sunset Avenue would be removed and relocated to Bear Street; and two parcels near MLK, Jr. East where the alignment of BL 81 shifts eastward. The parcels on Almond Street would range from approximately 0.75 to 1.5 acres; those on Erie Boulevard would range from 0.3 to 0.5 acres; the parcel north of Butternut Street would be 1 to 1.5 acres; the parcel south of Court Street would be 0.75 to 1 acre; and the parcels near MLK, Jr. East would be 3 to 3.5 acres (north of MLK, Jr. East) and 1 to 1.3 acres (south of MLK, Jr. East and east of Leon Street). In addition, the Community Grid Alternative would result in a total of approximately 2 to 2.5 acres consisting of numerous land strips that could be too small for development but may be of use to adjacent property owners, and there could be additional surplus right-of-way where MLK, Jr. East would be removed between the rear driveway of Dr. King Elementary School and BL 81.

NYSDOT would form a land use working group consisting of representatives from the city, the city's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel. Further details about the formation of and participation in this working group would be presented during continued Project public involvement activities. Final design must begin before the formation of this group, however, NYSDOT is open to forming the group prior to the completion of construction.

Any new use or development would be subject to the City of Syracuse's zoning ordinance and its Land Use and Development Plan 2040 currently being updated through its "Rezone Syracuse" project. Through the Rezone Syracuse process, the city has and continues to solicit community input.

9-26 NORTHSIDE UP/FRANKLIN SQUARE I-81 WORKING GROUP

- C 9-393: Northside UP / Franklin Square I-81 working group, consisting of stakeholders and residents of the Northside and Franklin Square neighborhoods, offers its support of the Community Grid. While there is more work to be done to make the Community Grid alternative the best that it can be, we feel the decision to choose it as the preferred alternative is the right one. We believe this is the best solution to achieve the goals of the I-81 Viaduct Project while also learning from past mistakes made when the highway was originally built. We also recognize it is the only alternative that takes demonstrable steps to address the racial and environmental justice issues created by and embodied in the presence of the existing viaduct. We appreciate the work that NYSDOT has put into listening to community concerns and incorporating this feedback into the project. We encourage it to continue to do so as the NEPA process moves toward the Record of Decision. While our comments below are focused on elements of the project in the Northside and Franklin Square neighborhoods, we contend several of them, including but not limited to the highlighted urban design principles, noise barrier location, and construction management, apply throughout the entire project area. We implore NYSDOT and their design team to incorporate these ideas throughout the project area.
- R 9-393: As stated in **Section 8.3** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative has been identified as the Preferred Alternative for the I-81 Viaduct Project. Please see responses to the suggested ideas in responses to **Comments 9-394 through 9-416**.
- C 9-394: Please incorporate congestion management best practices in an effort to not require expansion of the highway north of I-690, which studies show will ultimately create "induced demand", adding congestion on the highway over the long term. The SMTc report, Congestion Management Process – 2019 Status Update, prioritizes Transportation Systems Management and Operations (TSMO) improvements such as Traffic Incident Management, Access Control and Management, Signalization and Control above solutions that physically add capacity. In addition, improvements pertaining to pedestrian, bicycle, and transit facilities and services would apply to a systems-wide approach to addressing congestion.

- R 9-394: From I-690 to Hiawatha Boulevard, I-81 has three lanes in each direction. Widening this segment of the highway to provide four through lanes in the northbound direction is needed to improve capacity and traffic operations; TMS systems and other congestion management systems would not be sufficient to accommodate the demand. The southbound section would be maintained with three lanes (see **Figure 3-44** of the DDR/DEIS and FDR/FEIS). Several non-standard highway features, such as narrow shoulders, tight curves, and reduced sight distance, also would be corrected.
- C 9-395: Please consider refining the project's urban design context/elements to better interface with surrounding neighborhoods including, but not limited to, the Near Northside, Hawley Green, and Washington Square. These designs should pay particular attention to elements of the project that must be human scaled, including but not limited to sidewalks, bike infrastructure, transit amenities (bus stop shelters, signage, etc.), landscaping (street trees, plantings, etc.). It is critically important to design for the positive experience and perceptual characteristics of users waiting for a bus, walking, or bicycling as well. For many travelers in the Northside, these options may be their only viable mode of transportation.
- R 9-395: Urban design details will continue to be refined during final design.
- C 9-396: More detail is warranted to promote positive walking and cycling experiences on the Butternut and Spencer Street bridges, as well as the Court and Bear street bridges. It is critical to create the best possible pedestrian and bicycle experience in these locations to increase the connection between the Northside, Franklin Square, and Inner Harbor neighborhoods, particularly in light of the recent proposed Inner Harbor aquarium project. More generous sidewalk widths, bollards, landscaping, noise barriers, pedestrian-scaled lighting, and other elements are requested to create the sense and reality of safety and to acknowledge people walking and bicycling are important within this multi-modal system. While the amenities found on East Spring Street bridge over I-71 in Columbus, OH, may not be practical in Syracuse, we believe well-designed multi-modal transportation options accommodating our winters are possible and need to be incorporated into the final design. A local example of this is the Bridge Street overpass near the New York State Fair that was recently reconstructed as part of the Empire State Trail System.
- R 9-396: These details would be considered during final design.
- C 9-397: The underpasses of bridges carrying the highway over grade-level streets, such as those under I-690 between Franklin Square and Armory Square, Northside/Hawley Green and Downtown/Eastside require more details in their efforts to provide safe, interesting pedestrian and bike friendly environments in addition to meeting vehicular needs. These and other underpasses should be designed to feel and be safe, well-lit, and friendly/inviting for pedestrians and cyclists. Ample sidewalks, bike lanes (where appropriate), weather and snow barriers protecting pedestrians, and areas for road debris and snow to be collected are elements that should be provided. Bollards and low walls to act as barriers between travel lanes for vehicular and non-vehicular use should be considered.

- R 9-397: Features such as ample sidewalk widths, buffer areas, snow storage, lighting, and others have been integrated into the preliminary plans found in Appendix A-1 and would continue to be refined in final design.
- C 9-398: NYSDOT should be designing maximum 11-foot-wide travel lanes on at-grade streets designed for vehicular travel speeds of 30 mph, including but not limited to North Clinton, North State, and North Salina streets to encourage slower travel speeds.
- R 9-398: NYSDOT is proposing 13-foot lanes on the reconstructed North Clinton Street between Butternut and Spencer Streets; this wider width meets the minimum criteria for shared bicycle/vehicle lanes. North of Spencer Street, North Clinton would have 12-foot lane widths. On North State Street and North Salina Street, the 11-foot lane width would be maintained. 30 mph speeds would be maintained on City streets such as North Clinton, North State, and North Salina.
- C 9-399: Sidewalk widths should be based on the proximity of the sidewalk to moving vehicles and the anticipated amount of vehicular traffic. "Primary" sidewalks are those located in high vehicular traffic areas where people walking may feel intimidated or threatened by the speed of passing cars and should be a minimum of 12 to 14 feet wide to allow pedestrians to walk further away from the street edge if desired. "Secondary" sidewalks are those located along lower vehicular traffic areas, with a "tree lawn" buffer between the sidewalk and the street and should be a minimum width of 6 feet, as the 5-foot standard does not comfortably accommodate two people walking side by side.
- R 9-399: Sidewalks are designed in accordance with Highway Design Manual Chapter 18, "Pedestrian Facilities Design," which recommends a 5-foot-wide walkway for volumes of 8,000 pedestrians an hour and 6-foot-wide walkways for volumes of 10,000 pedestrians an hour. Plans in **Appendix A-1** depict sidewalk widths of 6 feet or greater in multiple areas. Sidewalk and buffer widths can be further refined in cooperation with the City during final design.
- C 9-400: Please install Leading Pedestrian Interval (LPI) signals at all intersections to enhance the visibility of pedestrians in the intersection and reinforce their right-of-way over turning vehicles as LPIs have been shown to reduce pedestrian-vehicle collisions by as much as 60 percent.
- R 9-400: As new traffic signals are installed by the project, new signal timing plans will be developed. As part of the development of these plans, the implementation of Leading Pedestrian Intervals may be considered at intersections with substantial pedestrian volumes and conflicting turning vehicle volumes.
- C 9-401: The proposed relocation of the Court Street on-ramp to Bear Street redirects non-Business Loop traffic to use Park Street to access Onondaga Lake Parkway, Old Liverpool Road and Buckley Road. This will increase traffic through a series of intersections along and around the Hiawatha Boulevard corridor that are already very unfriendly to pedestrian and bicycle traffic. Please investigate and implement improvements to the Park Street and Hiawatha Boulevard

corridors prioritizing pedestrian and bicycle safety, mitigating negative impacts of increased traffic on pedestrian, bicycle and transit users. Work with SMTTC, the City, and other partners to refine and implement suggestions made in the 2020 RTC/Market Area Mobility Study. At a minimum, improvements for pedestrian and bicycle safety to the following intersections should be implemented:

- Hiawatha and Lodi
- Hiawatha and Park
- Hiawatha and Carbon
- Park and NBT Bank Parkway/Harborside Drive

Additionally, Hiawatha Boulevard is a direct connection between the Northside and Destiny USA. Existing pedestrian and bicycle transportation infrastructure is minimal, unsafe and unfriendly. Incorporate improvements akin to those made to the Hiawatha Boulevard bridge over Onondaga Creek to extend a shared use path between the existing Onondaga Creekwalk at the Destiny USA Sky Bridge and Lodi Street to increase safety and friendliness of this pedestrian and bicycle space.

- R 9-401: These improvements are beyond the scope of the Project, but the Project does not preclude these actions by others.
- C 9-402: Improved bike and pedestrian facilities on the Bear Street bridge over Onondaga Creek are necessary to better facilitate connections between the Creekwalk and the new sidewalks being added by the project to Bear Street. The width of the Bear Street bridge over the Onondaga Creek appears wide enough to accommodate wider sidewalks similar those recently added to the Hiawatha Boulevard bridge over Onondaga Creek.
- R 9-402: Replacement of this bridge are not part of the Project's scope, but there is a separate, independent project to rehabilitate or replace this bridge, at which time the sidewalks would be reconstructed.
- C 9-403: With the proposed improvements at the Crouse and Irving interchanges, the design prioritizes vehicular traffic over the residents by not providing:
- Sidewalks on both sides of Crouse Avenue at the onramp to I-690. People will walk on the east side of the street regardless of the presence of a sidewalk so it would be safer to intentionally design one to accommodate this activity. Additionally, the underpass should be designed to address safety and enhance user experience as described above.
 - Sound barriers along the length of exit and entrance ramps to reduce noise and other negative impacts on quality of life for neighbors and businesses.
- R 9-403: The eastbound on-ramp on the south side of I-690 would be unsignalized; the off-ramp would be signalized. Crossing an unsignalized ramp would be undesirable and therefore the sidewalk was not provided. Likewise, a wide shared use path would be provided on the west side. Noise barriers in this location are not warranted based on the Project's traffic noise analyses.

- C 9-404: Design changes to North State Street and North Salina Street should complement the improvements the City made to North Salina Street by providing ample sidewalks, street trees, pedestrian-scaled lighting, and on-street parking.
- R 9-404: NYSDOT would provide ample sidewalks, on-street parking, and street trees within the Project limits as part of the Project's North State Street and North Salina Street improvements. Lighting would be replaced in kind where necessary.
- C 9-405: The current plans show a sidewalk provided on only one side of North Clinton Street between Bear and Court Streets. There have been numerous local instances where sidewalks haven't been provided in unsuccessful efforts to discourage pedestrian traffic and feel this will be no different. NYSDOT should install sidewalks on both sides of the street, creating a plan that addresses pedestrian safety related to vehicles existing or entering the highway at the new Bear/Clinton Street ramp from southbound BL 81.
- R 9-405: The sidewalk on the east side of North Clinton Street between Bear and Court Streets was not included because of safety concerns associated with a crossing at a large ramp intersection.
- C 9-406: Please proceed with the proposed roundabout at North Clinton Street and Court Street. In addition, please evaluate if what will essentially be a stub of Court between North Clinton and Genant Drive is necessary to maintain or if this should be returned to the City or the adjacent property owners.
- R 9-406: A roundabout at the intersection of North Clinton and Court Streets is not being proposed as part of the Project, although it would not be precluded from future consideration. The stub of Court Street between North Clinton and Genant Drive would not be removed as it serves two existing businesses.
- C 9-407: While NYSDOT has established quantifiable "feasible and reasonable" criteria for identifying areas that would benefit from noise barriers, noise barriers can also provide quality of life (sound and visual) benefits that are not quantified in these criteria. Barriers prevent the visual and physical presence of the highway from detracting and devaluing adjacent properties. In doing this, an opportunity is created for vacant, underutilized, and/or dilapidated properties to be revitalized. There are additional areas north of I-690 that require noise barriers to return undervalued properties back to productive use or prevent a decline in quality of life in adjacent properties including, but not limited to:
- The exit ramp area along Sunset Avenue up to Bear Street
 - The elevated portion of 690 that is being reconstructed throughout the Northside and Franklin Square
 - Both sides of Business Loop in the "canyon" between 690 and Hiawatha Boulevard.
 - The exit and entrance ramps associated with the Crouse / Irving interchange along Burnet Avenue.

- The Butternut, Spencer, Court and Bear street bridges.

Communities throughout the country have constructed noise barriers in similar dense urban environments and a reconstruction project of this size and scale should be able to find ways to incorporate these barriers to enhance the quality of life along the highway's current and future route.

R 9-407: As indicated in **Section 6-4-6** of the DDR/DEIS and FDR/FEIS, noise barriers are recommended in locations that are found to be feasible and reasonable based on FHWA noise regulation in 23 Code of Federal Regulations (CFR) Part 772 and the NYSDOT Noise Policy. The use of noise barriers to abate traffic noise in urban areas is often ineffective for many reasons including the presence of traffic noise emanating from the local roadway network (e.g., Burnet Avenue, North State Street, etc.). Of the locations noted in the comment, Noise Barrier 14 is recommended along northbound I-81/BL 81 between Spencer and Court Street. For reasons indicated in **Section 6-4-6** of the DDR/DEIS and FDR/FEIS, noise barriers are not recommended in the other locations cited by the commenter.

C 9-408: NYSDOT's openness to returning land to the City for redevelopment, including but not limited to the former Butternut and North State Street on-ramp Right of Way (ROW). We request that the NYSDOT work as quickly and efficiently as possible to return this land to the City and empower the land use working group comprised of local stakeholders with the ability to make land use planning decisions. Please contact the Northside Business Partnership if you would like to discuss any items that impact the Northside business community.

R 9-408: Comment noted. The DDR/DEIS and FDR/FEIS identify the potential parcels that could result from surplus transportation right-of-way (see **Sections 6-3-2.4.3** and **6-3-2.4.4**, and associated figures).

Upon the completion of construction, NYSDOT would dispose of potential surplus transportation right-of-way in the Central Study Area in accordance with Federal and State law, or the Contractor could sell staging sites. In total, implementation of the Community Grid Alternative could result in approximately 10 to 12.5 acres of surplus transportation right-of-way, depending on how much land would be needed to accommodate the highway, sidewalk, shared use (bicycle and pedestrian) path, and other transportation features (see **Figure 6-2-1-12**). NYSDOT would determine the size and location of the parcels once construction is complete. The potential surplus transportation right-of-way would consist of several sites near Almond Street and Erie Boulevard where the I-81 and I-690 ramps would be removed; a parcel north of Erie Boulevard between McBride and Catherine Streets where the eastbound I-690 ramp from McBride Street would be removed; a parcel north of Butternut Street between BL 81 and State Street where the existing northbound I-81 entrance ramp from Butternut Street would be removed; a parcel south of Court Street between BL 81 and Sunset Avenue where the existing northbound I-81 ramp to Sunset Avenue would be removed and relocated to Bear Street; and two parcels near MLK, Jr. East where the alignment of BL 81 shifts eastward. The parcels on Almond Street would range from approximately 0.75 to 1.5 acres; those on Erie Boulevard would range from 0.3 to 0.5 acres; the parcel north of Butternut Street would be 1

to 1.5 acres; the parcel south of Court Street would be 0.75 to 1 acre; and the parcels near MLK, Jr. East would be 3 to 3.5 acres (north of MLK, Jr. East) and 1 to 1.3 acres (south of MLK, Jr. East and east of Leon Street). In addition, the Community Grid Alternative would result in a total of approximately 2 to 2.5 acres consisting of numerous land strips that could be too small for development but may be of use to adjacent property owners, and there could be additional surplus right-of-way where MLK, Jr. East would be removed between the rear driveway of Dr. King Elementary School and BL 81.

NYSDOT would form a land use working group consisting of representatives from the city, the city's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel. Further details about the formation of and participation in this working group would be presented during continued project public involvement activities. Final design must begin before the formation of this group, however, NYSDOT is open to forming the group prior to the completion of construction.

Any new use or development would be subject to the City of Syracuse's zoning ordinance and its Land Use and Development Plan 2040 currently being updated through its "Rezone Syracuse" project. Through the Rezone Syracuse process, the city has and continues to solicit community input.

- C 9-409: Please directly engage with the Washington Square neighborhood groups with respect to the Lodi Street Overlook to understand their desire to create this space or if there are other ideas that might be more desirable or appropriate. There are recurring and on-going issues with large groups gathering late at night and early in the morning in the neighborhood in places that are hard to monitor. These groups frequently cause problems due to illegal activities, disturbing the lives of nearby residents. It is imperative that the Overlook be designed to be defensible and deter crime. Please work with the Syracuse Police Department to develop a plan reflective of Crime Prevention through Environmental Design (CPTED).
- R 9-409: Comment noted. NYSDOT will coordinate with the City and the Public Safety Working Group, which includes the Syracuse Police Department.
- C 9-410: The plans indicate the creation of a Creekwalk path on the west side of the creek with a connection along Evans Street in Franklin Square. Please clarify the rationale behind this two-block Creekwalk extension, how it will be landscaped, and who will be required to provide maintenance.
- R 9-410: The proposed path on the west side was created as a result of the removal of transportation infrastructure at West Street and would complement the path on the east side of the creek. This Creekwalk extension will facilitate a pedestrian/bicycle connection to the Near West Side. Landscaping would be determined during final design. The paths would be maintained by the City.

- C 9-411: It is important to provide accommodations for pedestrians, transit users, and bicyclists, in addition to vehicles, during construction, a challenge highlighted during the work in some areas of the North Salina and North State Street corridors during the summer of 2021. This is especially important for people with limited mobility (i.e., those relying on wheelchairs or motorized scooters). Please provide more clarity on how these accommodations will be provided and, in instances where there are problems during construction, who will be accountable for addressing them.
- R 9-411: Access would be provided for pedestrians, transit users, and bicyclists as well as vehicles during construction. NYSDOT would be responsible for implementing a public outreach plan during construction (see response to **Comment 9-386**).
- C 9-412: Without proper planning and coordination to support small businesses in the Northside, a multi-year road reconstruction project will hurt these businesses. We would like to see those impacts lessened whenever possible including:
- A clearer understanding of how NYSDOT and its contractors plan to give ample warning to businesses for activities impacting them and their customers.
 - The ability to help shape the project's construction schedule to reduce negative impacts on small businesses via open, two-way communication channels with NYSDOT and their contractors.
 - Opportunity to have "open during construction" signs for businesses installed at critical locations throughout the Northside.
- R 9-412: NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan, the specifics cannot be stated at this time. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation. At a minimum, the plan would include establishment of a centrally located, on-site project outreach office; establishment of a telephone hotline; a website with information about street closures, detours, nighttime construction activities, and locations and times of particularly noisy construction activities; and a specific communication schedule and procedures for providing construction status updates and other construction-related information to the general public (refer to **Section 4.5.2** for additional details). Businesses and other affected stakeholders will have access to a public information liaison, who will be provided as part of this outreach plan. Refer to **Table 4-7** re maintenance of access for businesses. Construction signs to direct traffic to businesses whose access has been modified will be provided as appropriate.
- C 9-413: The DDR/DEIS is unclear about the length of construction time during a given day. Please limit construction hours to 12 hours a day.
- R 9-413: As stated in **Table 4-7** of this FDR/FEIS, NYSDOT would coordinate work operations to coincide with time periods that would least affect neighboring residences and businesses.

- C 9-414: It appears that there will be impacts to mature landscaping and trees within the project area including, but not limited to, Franklin Square. Please review the planned tree removal with local neighborhood stakeholders prior to any removals. Please use replacement trees and landscaping of a size significant enough to create an established feel to these spaces upon completion of the project.
- R 9-414: NYSDOT Guidance for Landscape Development is provided in the Highway Design Manual, Chapter 28, "Landscape Architecture and Community Design For Transportation" (https://www.dot.ny.gov/divisions/engineering/design/dqab/hdm/hdm-repository/chapt_28.pdf). It is NYSDOT's policy to have an integrated landscape stewardship approach to the design, construction, and operation of its facilities. NYSDOT does not have a formula or any specific requirement for numbers or sizes of replacement trees. The goal is a suitable, context sensitive, sustainable landscape restoration for any disturbance. The City's Urban Master Plan would be used as a reference when developing the landscape restoration and planting plans during final design.
- C 9-415: Burnet Avenue will likely receive an increase of traffic during construction (regardless of if it is a designated detour route or not) as well as after. Please implement improvements to the street in preparation for this additional traffic, including to pedestrian, transit, and bicycle facilities.
- R 9-415: Based on the Project's traffic analysis, no improvements would be necessary on Burnet Avenue.
- C 9-416: The Northside UP/Franklin Square I-81 Working group remains open to further discussion with NYSDOT as the project moves toward implementation.
- R 9-416: Comment noted.
- 9-27 CENTERSTATE CEO**
- C 9-417: The Community Grid Alternative should be advanced.
- R 9-417: As stated in **Section 8.3** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative has been identified as the Preferred Alternative for the I-81 Viaduct Project.
- C 9-418: CenterState believes the insertion of a roundabout along the path of BL 81 is a good solution to reduce speeds and emissions, but that it is imperative that the community's voice be heard and that the school and its stakeholders receive utmost consideration as improvements are evaluated, including but not limited to, relocation of the roundabout and improvements to the Martin Luther King school itself, such as state of the art air filtration systems. We also suggest NYSDOT utilize roundabouts in other locations (i.e., southern and western communities) to encourage truck traffic to stay on the interstate.

R 9-418: As described in **Chapter 3** of this FDR/FEIS, based on public input received during the DDR/DEIS public comment period, FHWA and NYSDOT are no longer proposing a roundabout at MLK, Jr. East in the vicinity of Dr. King Elementary School as part of the Community Grid Alternative. By eliminating the roundabout in this location, the proposed transportation system (and associated construction activities) would be moved as far away as practicable from the school. The duration of construction in this location would also be reduced. Roundabouts in western and southern communities, such as along Routes 281 and 41 in Homer, as well as along Routes 20 and 41 and Routes 20 and 41a in Skaneateles, are being considered as part of other NYSDOT projects and would encourage truck traffic to stay on the interstate.

With respect to air quality at the school, as stated in **Chapter 4 (Table 4-7), Section 6-2-3,** and **Section 6-4-4** of this FDR/FEIS, an outdoor ambient air quality monitoring program would be implemented during construction of the Project and would be overseen by NYSDOT. The program would consist of real-time particulate monitoring at a few locations within the local community, including locations within the environmental justice community. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School when construction would be occurring near the school. Locations for other program monitors would be determined during final design.

C 9-419: The width of BL 81 ROW should be reduced through the City to return as much land as possible for redevelopment. This may be achieved by reducing the width of the proposed lanes from 12 feet to 11 feet, as well as narrowing the adjacent sidewalk, bicycle infrastructure, median, and green space areas, while preserving areas for infrastructure, storm drainage, and snow storage.

R 9-419: See response to **Comment 4-43** regarding lane widths on BL 81. NYSDOT will work with the City and appropriate stakeholders during the final design phases to refine the design of the areas of Almond Street outside the curblines, including widths of the medians and pedestrian refuge areas, cycle track, shared use lanes, and sidewalks, etc. The refinements to Almond Street would be designed to be consistent with the City's vision and the needs and objectives of the Project.

C 9-420: The future use of surplus property must be determined by a Land Trust Group. It must include at least three members of each community to get broad community input.

R 9-420: As explained in **Section 6-3-2.4.3**, most of the land beneath the existing viaduct would be used for transportation, pedestrian, and parkland improvements in the Community Grid Alternative. However, upon the completion of construction, NYSDOT could dispose of potential surplus transportation right-of-way in the Central Study Area in accordance with Federal and State law, or the Contractor may sell staging sites. In total, implementation of the Community Grid Alternative could result in 10 to 12.5 acres of surplus transportation right-of-way, depending on how much land would be needed to accommodate the highway, sidewalk,

shared use (bicycle and pedestrian) path, and other transportation features (see **Figure 6-3-2-3**). NYSDOT will form a land use working group consisting of representatives from the City, the City's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of potential surplus parcels. Further details about the formation of and participation in this working group will be presented during continued Project public involvement activities.

- C 9-421: Transit improvements must be incorporated into the Community Grid Alternative.
- R 9-421: A stated objective of the Project is to "maintain access to existing local bus service and enhance transit amenities within the Project limits in and near Downtown Syracuse." "Transit amenities" refers to bus stops and shelters, bus turnouts, and layover and turnaround places within the Project limits in and near Downtown Syracuse. As part of the development of the Viaduct and Community Grid Alternatives, NYSDOT will continue to coordinate with Centro on potential street improvements. In addition, NYSDOT considered the potential effects on public transit, pedestrians, and bicyclists for both build alternatives (see **Sections 6-2-2.3.1** and **6-2-2.4.1**). During construction, temporary park-and-ride locations would be provided as described in **Table 4-7**. Additional transit improvements are outside the scope of the Project. The Project would not preclude Centro or others from carrying out transit improvements in the future, as separate, independent actions.
- C 9-422: The Project should employ local people during construction. The Project should implement the federal SEP-14 Local Hire program and should have a CWA-PLA agreement in place that includes unions and community representatives in decision-making for the Project.
- R 9-422: NYSDOT has submitted an application that if approved will create a local hiring preference for the I-81 Viaduct Project. The Department has appreciated the collaboration it has had with Urban Jobs Taskforce and others to create an application that will create an opportunity for the community to seek employment through the I-81 Viaduct project and will include an expansion of NYSDOT's On-the-Job Training program for the project to increase access for individuals to seek careers in heavy highway construction. This will help give greater opportunity for individuals living near the project and in the City of Syracuse to work directly on the project. In addition to the federal local hiring preference application, NYSDOT has partnered with NYSDOL to create Workforce Forward: Syracuse. This program and \$1 Million in State funding will seek to connect workers to training opportunities and to good-paying short-term and long-term infrastructure jobs in and around Syracuse. For those seeking to work on the many ancillary jobs that will be created by this project, Workforce Forward will help place, and train those individuals. The plan is to have NYSDOL in the local community connecting with people in the neighborhoods they live and help them find the employment or training they will need to be successful. NYSDOT also has the WorkSmart NY program in partnership with SUNY EOC which is helping give those who want to work in infrastructure construction the basic skills to work on any job site. NYSDOT has applied for federal grant

funds through FHWA to expand the program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program will grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship which is a program to help get more people involved in local trades unions. NYSDOT has recently secured federal STICC funds to create a new, interactive video program to introduce and encourage High School students to pursue careers in heavy highway construction. The plan is to work directly with the Syracuse City School District and its P-Tech program to show students the vast opportunities they have in the field of building infrastructure through first-person videos by students and individuals working on projects. The idea is to use the I-81 Viaduct Project as a catalyst to create video content that students can explore to learn more about fields of interest. NYSDOT wants to create a unique, meaningful program that would lead to opportunities for long-term employment on the Project. NYSDOT plans to monitor the local hiring metrics throughout the project and will conduct regular meetings with the WorkSmartNY Syracuse Build Collaborative to gauge the progress on hiring and where things need to be adjusted.

- C 9-423: The responsibility for maintenance and snow removal for the Community Grid Alternative would fall on the City. This would burden the City's limited assets.
- R 9-423: NYSDOT will further collaborate with the City on this topic. NYSDOT will own and maintain the BL 81 corridor and be responsible for snow removal.
- C 9-424: Are there options for residents to relocate during construction? NYSDOT must offer market-rate buyouts, rent subsidies, and/or temporary relocation assistance for people who want to move. An easement reassessment must be conducted so that renters receive easement payments if they lose access and partial enjoyment of their homes during construction.
- R 9-424: The temporary relocation of residents during construction is not required for the Community Grid Alternative. In addition, the Community Grid Alternative would not displace residents.
- C 9-425: Lengthy construction may be detrimental to many businesses, particularly those that are destinations for visitors, and that depend on foot traffic or ease of vehicular access. Access to timely information (and mitigation measures where necessary) will be critical. The means to provide both must be planned well in advance. NYSDOT should continue to meet and share information about the evolving construction project and phasing with the City, county, businesses, organizations and community groups, and to gather feedback.
- R 9-425: NYSDOT would require that the Contractor prepare a communication and public outreach plan for its approval. The plan would be implemented throughout the construction period. As it would be the Contractor's responsibility to develop and implement this plan, the specifics cannot be stated at this time. NYSDOT would assume the hands-on responsibility for administering the plan and ensuring its implementation. At a minimum, the plan would include establishment of a centrally located, on-site project outreach office; establishment of a telephone hotline; a website with information about street closures, detours, nighttime

construction activities, and locations and times of particularly noisy construction activities; and a specific communication schedule and procedures for providing construction status updates and other construction-related information to the general public (refer to **Section 4.5.2** for additional details).

- C 9-426: NYSDOT should use Design Bid Build contracts for work within the City where a higher degree of control is necessary to ensure what is built reflects the plans that the public has been involved with creating.
- R 9-426: The conversion of I-481 under phase 1 of construction will be done through design-build, however, the remaining three contracts in phase 1, which involve work within the City, would be done via design-bid-build. NYSDOT will consider the best mechanism for future contracts during phase 2.
- C 9-427: NYSDOT should more closely examine proposed detour routes and the lengths of times they will be in place, as these routes will likely impact environmental justice communities, especially routes proposed for use by construction vehicles.
- R 9-427: Concepts to maintain traffic during construction, including estimated construction times and locations, are described in **Chapter 4** and will be further refined in final design; however, it is anticipated that the scenarios will be consistent with those that were considered in the EIS.
- C 9-428: NYSDOT should work with other state agencies to make I-90 toll free through Syracuse during construction of the project to encourage drivers to use this alternate route.
- R 9-428: I-90 is owned and operated by the New York State Thruway Authority (NYSTA), and any modifications to its toll structure are beyond NYSDOT's jurisdiction.
- C 9-429: The proposed changes to the West Street/I-690 interchange would create approximately 0.75 acres of useable land where the Herald Place exit ramp will be removed. The current plan for this land is to create a short two block section of the Creekwalk to the west side of the creek. As this is an important section of the Creekwalk, coupled with the strong desire to increase property tax and build new opportunities for businesses and residents of the City, this area would benefit greatly from a comprehensive development plan for this corner of downtown to determine its best use.
- R 9-429: NYSDOT would coordinate the design of the shared use paths proposed in this parcel with the City and refine the location of the paths as appropriate during final design. NYSDOT will work with the land use working group on the disposal of non-transportation surplus right-of-way. See **Section 6-2-1.4.3** of the DDR/DEIS and FDR/FEIS, which describe the potential surplus transportation right-of-way that could become available for development or other use under the Community Grid Alternative once transportation infrastructure is removed.
- C 9-430: Wilson Park should not be used as a staging area for construction or materials.

- R 9-430: The easternmost portion of Wilson Park that is within the NYSDOT right-of-way would be used for construction, equipment, and staging. However, no construction staging would occur outside of the NYSDOT right-of-way in the park. Please refer to response to **Comment 9-9** for additional details. As described in **Chapter 4 (Table 4-7)** of this FDR/FEIS, NYSDOT would require its contractors to comply with numerous measures to minimize or otherwise mitigate adverse effects on sensitive land uses/facilities, including parks and recreational resources, during construction.
- C 9-431: Install pedestrian activated crossing lights at Monroe and Madison streets to proactively address the issues that were experienced on West Street from occurring on Almond.
- R 9-431: Pedestrian activated crossings on Monroe and Madison Streets would be considered during final design.
- C 9-432: Please install Leading Pedestrian Interval (LPI) signals at all intersections to enhance the visibility of pedestrians in the intersection and reinforce their right-of-way over turning vehicles as LPIs have been shown to reduce pedestrian-vehicle collisions by as much as 60 percent.
- R 9-432: As new traffic signals are installed by the project, new signal timing plans will be developed. As part of the development of these plans, the implementation of Leading Pedestrian Intervals may be considered at intersections with substantial pedestrian volumes and conflicting turning vehicle volumes.
- C 9-433: NYSDOT should pursue a consolidated regional transportation operations center, as has been successfully developed in Monroe County. This is particularly relevant considering the many “smart City” advances that have been introduced as part of the Syracuse Surge initiative. The Center could serve as an anchor tenant within the City. The Center could be tasked with launching efforts toward a coordinated county/City signal system, which would improve efficiency of traffic movement throughout the Community Grid corridor and the county.
- R 9-433: SMTC is progressing a planning study to identify if a co-located Transportation Management System (TMS) center between the State, City, and County, would be the correct solution to manage the overall transportation network in Central New York. NYSDOT is a participant in this planning study and will consider the recommendations ultimately made by the study.
- C 9-434: CenterState CEO supports the recommendations of its local affiliated groups, which address more detailed comments with respect to their constituencies.

R 9-434: Comment noted.

9-28 CENTRAL NEW YORK REGIONAL PLANNING AND DEVELOPMENT BOARD

- C 9-435: 1) BL 81 should begin as a low-speed boulevard closer to the current I-81/I-481 southern interchange to better disperse traffic and avoid placing heavy traffic and congestion at MLK,

Jr. East near the Dr. King Elementary School. The extra time to travel along this boulevard from I-81 interchange to downtown Syracuse is acceptable and consistent with the community grid concept.

2) The design of BL 81 southern interchange to the “touching down point at its first intersection at MLK drive” places an unreasonable amount of congested and heavy traffic immediately adjacent to the MLK Elementary School and a residential neighborhood. This situation violates good design standards and environmental justice requirements. Recommend the first intersection for BL-81 be created in much closer proximity to the southern interchange.

R 9-435: 1) While NYSDOT would not extend the 30 mph City street southward to the southern interchange, this would not be precluded from occurring under a future project.

2) Traffic calming measures would be implemented beginning at Colvin Street to encourage motorists to reduce speeds prior to reaching the MLK, Jr. East area.

C 9-436: Include roundabouts at Brighton, Colvin, and Van Buren to ensure proper traffic calming measures from BL 81 to the community grid boulevard.

R 9-436: While roundabouts are not proposed at Brighton and Colvin Streets, they would not be precluded from being implemented as part of a future project, and traffic calming measures would be in place between the Colvin Street and MLK, Jr. East area. As stated in **Section 3.4.3**, a roundabout is proposed at Van Buren Street.

C 9-437: Connect Van Buren Street and East Raynor Avenue in a complete east-west direction to provide more connectivity from residential neighborhoods west of BL 81 to the University Hill area.

R 9-437: This connection would be infeasible because of the substantial grade change between Van Buren Street and East Raynor Avenue. In addition, it would require an at grade railroad crossing, which would be highly undesirable.

C 9-438: If the community grid concept works, why is this new interchange at Crouse and Irving Avenues needed? This is simply the traditional use of interstate highway single-point access standards that typically lead to extreme traffic congestion and traffic back up onto the highway during rush hour.

R 9-438: The Crouse and Irving Avenues interchange is one of the key features of the Community Grid and its ability to disperse traffic. All the intersections within the interchange area, as well as the freeway in this area, would operate at LOS of C or better during 2026 and 2056 AM and PM hours (refer to **Figures 5-34** and **5-35** and **Table 5-52** of the DDR/DEIS and FDR/FEIS).

C 9-439: The construction of a new Oswego Street exit ramp from BL 81 southbound places too much traffic in a congested area of the City with important and historic assets, narrow/short length

streets, and significant pedestrian and planned bicycle activity. This exit ramp is unnecessary and contrary to the community grid concept.

The planned new ramp at Pearl Street to BL 81 northbound is a very inefficient means to move northbound street level traffic onto BL 81 northbound because of the requirement for short distant turning moves at the intersections of North State Street/Willow Street/and Pearl Street. This area is typically very backed up with traffic at the evening rush hour period. The Pearl Street ramp should be eliminated and traffic routed along North State Street to a newly designed entrance ramp at North State and Butternut Street.

- R 9-439: All intersections within the vicinity of the proposed Oswego Boulevard and Pearl Street ramps would operate at LOS C or better in 2026 and 2056 (refer to **Figures 5-34** and **5-35** of the DDR/DEIS and FDR/FEIS).
- C 9-440: The proposed entrance/exit ramp at Willow/James/Erie Blvd. should be eliminated. This appears to simply be removing an existing congested area at Clinton/Salina/Franklin further east without any community benefits.
- R 9-440: The proposed improvements in the Oswego Boulevard/Pearl Street play an integral role in the dispersal of traffic under the Community Grid Alternative and would operate at LOS C or better during the 2026 and 2056 peak periods (refer to **Figures 5-34** and **5-35** of the DDR/DEIS and FDR/FEIS).
- C 9-441: Remove the proposed Qualifying Highway designation from BL 81 through Downtown to allow narrower traffic lanes that will encourage slower vehicular speeds, promote pedestrian safety, and free up more land for development.
- R 9-441: BL 81 would be designated as a Qualifying Highway and designed to handle buses, recreational vehicles, and trucks, including large, heavy vehicles with a width limit of 102 inches. The Qualifying Highway designation is used in New York State to depict a National Network Highway, or a highway designated as part of the federal Surface Transportation Assistance Act (STAA) of 1982 (P.L. 97-424) as one that allows STAA vehicles³ and 53-foot trailers to use it as well as any other highway within one linear mile. As a Qualifying Highway, BL 81 would be designed with the physical characteristics to accommodate large, heavy vehicles along its length. These characteristics include appropriate horizontal and vertical alignments, lane widths (12 feet wide), turning radii, sight distance, and auxiliary lanes with acceleration/deceleration lanes of sufficient length and storage (see Design Criteria Tables in **Appendix C-6** for more information about design characteristics). For example, all City street intersections would be designed to allow buses and SU-30 (single unit with three axles) trucks to turn at them, and highway ramps would be designed to accommodate WB-67 (53-foot tractor trailer) trucks. Under the Community Grid Alternative, Qualifying Highways, including

³ STAA vehicles are tractor trailer combinations greater than 65 feet, tractors with 28-foot tandem trailers, maxi-cubes, triple saddle mounts, stinger-steered auto carriers, and boat transporters.

BL 81 and interstate system roadways, and designated truck access routes, including local roadways, are subject to change from the existing condition. These changes are identified in the Designation/De-Designation Package (contained in **Appendix B-5**).

- C 9-442: The West Street interchange improvements must include major design changes to West Street to allow complete west-east connectivity from the residential neighborhood to the west to downtown Syracuse and include the elimination of the slip/access road that parallels West Street. This access road creates an additional physical barrier and would not be necessary if West Street is redesigned.
- R 9-442: Removal of the slip/access road at Tracy Street and Erie Boulevard would require removal of the grade separation at West Street and Erie Boulevard, which is beyond the scope of this Project but would not be precluded as a future action by others.
- C 9-443: Do not widen BL 81 north of I-690. Additional lanes are inconsistent with the community grid concept and are unnecessary.
- R 9-443: This segment of the highway would be widened from three four through lanes in the northbound direction to improve capacity and traffic operations (the southbound section would be maintained with three lanes). Several non-standard highway features, such as narrow shoulders, tight curves, and reduced sight distance, also would be corrected.
- C 9-444: Are there options for residents to relocate during construction? NYSDOT must offer market-rate buyouts, rent subsidies, and/or temporary relocation assistance for people who want to move. An easement reassessment must be conducted so that renters receive easement payments if they lose access and partial enjoyment of their homes during construction.
- R 9-444: The temporary relocation of residents during construction is not required for the Community Grid Alternative, which would not displace residents.
- C 9-445: The Project should employ local people during construction. The Project should implement the federal SEP-14 Local Hire program and should have a CWA-PLA agreement in place that includes unions and community representatives in decision-making for the Project.
- R 9-445: NYSDOT has submitted an application that if approved will create a local hiring preference for the I-81 Viaduct Project. The Department has appreciated the collaboration it has had with Urban Jobs Taskforce and others to create an application that will create an opportunity for the community to seek employment through the I-81 Viaduct project and will include an expansion of NYSDOT's On-the-Job Training program for the project to increase access for individuals to seek careers in heavy highway construction. This will help give greater opportunity for individuals living near the project and in the City of Syracuse to work directly on the project. In addition to the federal local hiring preference application, NYSDOT has partnered with NYSDOL to create Workforce Forward: Syracuse. This program and \$1 Million in State funding will seek to connect workers to training opportunities and to good-paying

short-term and long-term infrastructure jobs in and around Syracuse. For those seeking to work on the many ancillary jobs that will be created by this project, Workforce Forward will help place, and train those individuals. The plan is to have NYSDOL in the local community connecting with people in the neighborhoods they live and help them find the employment or training they will need to be successful. NYSDOT also has the WorkSmart NY program in partnership with SUNY EOC which is helping give those who want to work in infrastructure construction the basic skills to work on any job site. NYSDOT has applied for federal grant funds through FHWA to expand the program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program will grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship which is a program to help get more people involved in local trades unions. NYSDOT has recently secured federal STICC funds to create a new, interactive video program to introduce and encourage High School students to pursue careers in heavy highway construction. The plan is to work directly with the Syracuse City School District and its P-Tech program to show students the vast opportunities they have in the field of building infrastructure through first-person videos by students and individuals working on projects. The idea is to use the I-81 Viaduct Project as a catalyst to create video content that students can explore to learn more about fields of interest. NYSDOT wants to create a unique, meaningful program that would lead to opportunities for long-term employment on the Project. NYSDOT plans to monitor the local hiring metrics throughout the project and will conduct regular meetings with the WorkSmartNY Syracuse Build Collaborative to gauge the progress on hiring and where things need to be adjusted.

- C 9-446: Include the construction of major publicly sponsored parking garages at BL 81 southbound/Court Street and I-690 eastbound/Crouse and Irving to significantly reduce traffic congestion and better use of land resources in the downtown and University Hill area.
- R 9-446: As discussed in **Section 5.6.1** of the DDR/DEIS and FDR/FEIS, the Community Grid Alternative would result in a loss of 1,089 public off-street parking spaces, which include spaces used by employees at the New York State Office Building. A variety of potential options were evaluated to mitigate the loss of public off-street parking spaces, including the replacement of existing parking facilities and the development of new surface parking lots. Locations were considered that would not require additional property takings, would not be desirable for commercial development, and would not impact City zoning, or any potential new greenspace or gateway-type areas. A preferred mitigation option was identified that accounts for the reduction in the number of spaces that need to be compensated due to the anticipated increase in the number of telecommuters over the long-term (817 spaces to be replaced versus 1,089 spaces). The preferred mitigation option also considers the proximity of the proposed parking facilities to the location of public off-street parking spaces that would be lost. The preferred mitigation option proposes four new surface parking facilities, which would be situated near the existing parking facilities that would be removed under the Community Grid Alternative. Combined, the four proposed parking facilities would provide 896 public off-street parking spaces, which exceeds the minimum 817 that are needed. After further evaluation, it

was determined that a new parking garage would not be required to mitigate the public off-street parking impacts.

- C 9-447: Include the proposed BRT James Street/Downtown and University Hill/Destiny routes that were the subject of an SMTTC study in 2018.
- R 9-447: A stated objective of the Project is to “maintain access to existing local bus service and enhance transit amenities within the Project limits in and near Downtown Syracuse.” “Transit amenities” refers to bus stops and shelters, bus turnouts, and layover and turnaround places within the Project limits in and near Downtown Syracuse. As part of the development of the Viaduct and Community Grid Alternatives, NYSDOT will continue to coordinate with Centro on potential street improvements. In addition, NYSDOT considered the potential effects on public transit, pedestrians, and bicyclists for both build alternatives (see **Sections 6-2-2.3.1** and **6-2-2.4.1**). Additional transit improvements are outside the scope of the Project. The Project would not preclude Centro or others from carrying out transit improvements in the future, as separate, independent actions.
- C 9-448: Include a new interchange at the new I-81 route to provide access to University Hill /Skytop area from the south to reduce traffic congestion at the proposed I-690 Crouse/Irving interchange.
- R 9-448: This would be outside the scope of this Project but not precluded as a future action by others.
- C 9-449: Funds should be directed to fully building out a publicly sponsored business park/warehouse and distribution center/and inland port in the town of Dewitt/Manlius CSX rail area at Kirkville Road with direct ramp/highway access to I-481/new I-81. A modern business park would be a major attraction and magnet for logistics activity in the community and a generator of new property tax revenue for the host communities.
- R 9-449: Construction of a business park would not address the purpose and need of the Project, or be required as result of the Project, and is therefore beyond the scope of the Project.
- C 9-450: NYSDOT must allow for the re-use of surplus right-of-way and identify a process for its re-use.
- R 9-450: As documented in **Section 6-2-3** of the DDR/DEIS and FDR/FEIS, implementation of the Community Grid Alternative could result in 10 to 12.5 acres of potential surplus transportation right-of-way. Regarding the disposition of this right-of-way, NYSDOT would form a land use working group consisting of representatives from the City, the City’s school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel. Any new use or development would be subject to the City of Syracuse’s zoning ordinance and its Land Use and Development Plan

2040 currently being updated by the ReZone Syracuse project. Through the ReZone Syracuse process, the City has and continues to solicit community input.

- C 9-451: Use green infrastructure and bio-retention facilities to help overall storm management practices in the community.
- R 9-451: **Chapter 5** provides calculations and a detailed discussion on stormwater best management practices (BMPs) and green infrastructure, such as infiltration basins, pervious pavements, vegetative buffers, and other green infrastructure practices that promote ground infiltration. However, due to the dense urban nature of the Central Study Area, more compact treatment devices also were considered. Water quality treatment for the new bridges and roadway pavements would be accommodated through infiltration and detention basins, as space, soil conditions, and geology permit, and in hydrodynamic units where space is limited. The locations and design of the BMPs would be finalized during final design and would meet all requirements of the NYSDEC Stormwater Management Design Manual. All water resource mitigation is described in **Section 6-4-7**.
- C 9-452: Introduce design concepts into the Project to enhance renewable energy development in the community including solar powered lighting/smart grid along the corridor route.
- R 9-452: Materials specifications and contractors are determined as design advances. NYSDOT would incorporate the latest technologies (such as renewable energy techniques) and safety features in the Project, as appropriate, provided that they meet NYSDOT's materials specifications and standards.
- C 9-453: Use mitigation funding to capitalize a small business operating and capital improvement loan program to assist businesses impacted by Project; to capitalize a program to support sports recreation and business development activities in the Syracuse Lakefront and Town of Salina that will generate business activity for Destiny USA and the Salina hotel complex development area; and to capitalize on a community public infrastructure capital improvement grant program to address local infrastructure/roads impacted by the Project.
- R 9-453: Establishing a community benefit enhancements/mitigation fund is beyond the scope of this Project. The Project is being federally funded by FHWA; therefore, expenditures are restricted to transportation purposes. Mitigation measures are confined to the Project Area. Measures proposed for mitigation are described under each relevant resource category in **Chapter 6**.
- C 9-454: Use mitigation funding to capitalize an endowment to offset the cost of lost revenue if tolls are removed from a section of the NYS Thruway in the Syracuse area. Removal of these tolls is a means to reduce traffic on Interstate 81/481 and BL 81 and address problems of northbound truck traffic exiting I-81 in the Cortland/Homer area and using local roads to access points west of Syracuse.

- R 9-454: Modifications to I-90 and its toll structure are outside the jurisdiction of NYSDOT, as it is owned and operated by the New York State Thruway Authority.
- C 9-455: Use mitigation funding to construct an “extension” of State Route 90 in Cayuga County from State Route 90 to US 20/5 west of the City of Auburn, as a means to reduce truck traffic in western Onondaga County and the City of Auburn.
- R 9-455: Local routes through the Finger Lakes region have requirements for overweight or oversized permitting for truck traffic overseen by the local roadway jurisdictions, and those restrictions would not be altered as part of the Project. As discussed in **Section 5.6.1** of this FDR/FEIS and as shown in **Tables 5-52** and **5-53**, using results of the regional model, a comparison of traffic exiting I-81 at New York State Route 20 with the Community Grid Alternative versus the No Build Alternative indicated a negligible number of traffic diversions along this route. As part of two separate projects, NYSDOT is planning to install a roundabout in Homer at the intersection of Route 281 and 41. NYSDOT is also analyzing the installation of Roundabouts in Skaneateles at the intersections of Route 20 and 41A, plus Route 20 and 41. These safety projects will encourage large trucks to utilize the interstate highways as they are better suited for carrying trucks than non-interstate systems. Extension of State Route 90 is beyond the scope of the Project.

10 LIST OF COMMENTERS

10-1 INTRODUCTION

The following table lists commenters who submitted comments on the DDR/DEIS, and includes the name, type of comment, date, and assigned response number(s), which correspond to Sections 1 through 9 of this appendix. The response numbers indicate where the relevant responses to comments can be found. For instance, response 2-1 is found in Section 2 of this appendix, 3-1 is in Section 3, and so on. As noted in Section 1 of this appendix, similar comments were grouped and summarized, and a response is provided to each summary comment.

For commenters who submitted multiples of the same submission type, the comments are reflected in one row. "Unknown" appears in the date column for petition-signers and commenters who sent postcard(s) as these comments contained no dates; NYSDOT received all petitions on October 13, 2021, and all postcards on October 14, 2021.

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
[Name Undecipherable]		Postcard	Unknown	7-89, 7-6, 7-149
[Name Undecipherable]		Postcard	Unknown	7-6, 7-27, 7-27
[Name Undecipherable]		Postcard	Unknown	7-9, 7-4, 7-27
[Undecipherable]	Nearia	Petition	Unknown	9-334
Abate	Andrew	Email	08/10/21	9-291
Abbott Hill	Courtney	Email	10/14/21	9-291
Abdul Sabur	Michele	Petition	Unknown	9-334
Abdul-Qadir	El-Java	Postcard	Unknown	7-27, 7-131, 7-129
Abdul-Qadir	Ibrahim	Postcard	Unknown	7-6, 7-131, 7-129
Abdul-Qadir	Sophary Un	Postcard	Unknown	7-6, 7-32, 7-129
Abold	Sue	Online Form	10/13/21	3-1
Abrams	Jon	Email	10/13/21	9-291
Abrams	Reginald	Petition	Unknown	9-334
Abrams	Wanda	Petition	Unknown	9-334
Acevedo	Maudine	Petition	Unknown	9-334
Achimore	Linda Achimore	Online Form	10/11/21	3-2
Ackelsberg	Martha	Email	08/10/21	9-291
Ackerman	Alexandra	Email	07/23/21	9-291
Ackley	Kelly	Email	08/10/21	9-291
Adair	Daywan	Petition	Unknown	9-334
Adam	Bronwyn	Postcard	Unknown	7-27, 7-27, 7-141
Adams	Bobby	Petition	Unknown	9-334
Adams	Bryan	Petition	Unknown	9-334
Adams	Denia	Petition	Unknown	9-334
Adams	Dwain	Petition	Unknown	9-334
Adams	Ebony	Petition	Unknown	9-334
Adams	Irene	Petition	Unknown	9-334
Adams	John	Postcard	Unknown	7-89, 7-148, 7-141, 7-84
Adams	Joseph	Online Form	07/20/21	7-60
Adams	Kevin	Petition	Unknown	9-334
Adams	Monica D.	Petition	Unknown	9-334
Adams	Paula	Petition	Unknown	9-334
Adams	Robert	Petition	Unknown	9-334
Adams	Sean	Petition	Unknown	9-334
Adams Brown	AJ	Postcard	Unknown	7-84, 4-67, 4-54
Adamy	Carlita	Postcard	Unknown	7-148, 7-141, 7-133
Addai	Kofi	Postcard	Unknown	7-27
Addley	Jemola	Online Form	10/14/21	4-1
Addubai	Hane	Petition	Unknown	9-334
Adeeko	Adedoyin	Email	08/10/21	9-291
Adjei	JoAnn	Petition	Unknown	9-334
Adjei	Zina	Petition	Unknown	9-334
Adjei	Zinaya	Petition	Unknown	9-334
Adsitt	Linda	Email	10/08/21	5-10
Adsitt	Linda	Online Form	10/12/21	5-10
Adydan	Dave	Online Form	10/11/21	4-2
Aeolel	Joe	Petition	Unknown	9-334
Agnew	Ellen	Postcard	Unknown	7-27, 7-149, 4-104
Agnew	Helen B.	Postcard	Unknown	7-32, 7-27, 7-129
Agni	Jean	Email	10/13/21	9-291
Agostini	Paige	Email	08/10/21	9-291
Agro	Joan	Email	10/13/21	9-291
AIA Central New York		Letter	10/14/21	7-9, 7-15, 4-71, 4-1
Aiken	Berkin	Email	10/13/21	9-291
Aisaka	Kristelle	Petition	Unknown	9-334
Ajak	Garang	Petition	Unknown	9-334
Akins	Daniel	Postcard	Unknown	7-6, 7-131, 4-54
Akuoku	KK	Email	08/10/21	9-291
Alaimo	Jerry	Written Form	08/18/21	6-34
Alario	Linda	Postcard	Unknown	7-84, 7-32, 7-133
Alaur	A. Rabb	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Albee	Marie & Charles	Email	10/12/21	4-1, 4-55, 4-37, 6-9
Alberghini	Jennifer	Email	10/14/21	9-291
Alberino	Julia	Email	08/10/21	9-291
Alcanry	Angelique	Postcard	Unknown	7-141, 4-67, 4-54, 7-1
Alexander	Bob	Online Form	08/30/21	8-3
Alexander	Courtney	Oral	08/17/21	6-9
Alexander	Jesse	Petition	Unknown	9-334
Alexander	Shakeif	Petition	Unknown	9-334
Alford	Johnny	Petition	Unknown	9-334
Alford	Loran	Postcard	Unknown	7-131, 7-129, 4-54
Alger	Cheryl	Online Form	08/09/21	6-1
Alger	Lawrence	Email	08/10/21	9-291
Ali	Tashame	Petition	Unknown	9-334
Alicea	Jaime	Written Form	09/09/21	4-55
Alkhouri	Hani	Online Form	09/13/21	2-1
Allah	Shaamgod	Email	08/10/21	9-291
Allen	Brian	Email	10/13/21	9-291
Allen	Carol	Email	08/19/21	9-291
Allen	Cheryl	Postcard	Unknown	7-6, 7-149, 7-133
Allen	David	Letter	10/07/21	2-1
Allen	Edith	Email	08/18/21	9-291
Allen	Kevin	Petition	Unknown	9-334
Allen	Kim	Petition	Unknown	9-334
Allen	Latoya	Postcard	Unknown	7-84, 7-131, 7-133
Allen	Linda	Email	08/10/21	9-291
Allen	Madison	Petition	Unknown	9-334
Allen	Patricia	Petition	Unknown	9-334
Allen	Patricia	Postcard	Unknown	7-32, 7-141, 7-133, 7-133
Alliance for a Green Economy		Letter	10/14/21	9-329 through 9-333
Allison	Connie	Email	10/13/21	9-291
Allison	Meryl	Email	08/10/21	9-291
Almog	Nimo	Letter	08/18/21	3-2
Alston	Edith	Email	08/10/21	9-291
Alt	Peggy	Email	08/10/21	9-291
Alvarez	Gambino	Email	08/10/21	9-291
Alvarez	Luis	Email	08/10/21	9-291
Alvarez	Vanessa	Email	08/10/21	9-136, 9-135, 9-133, 7-52, 4-2
Alvaro	Lisa	Postcard	Unknown	7-4, 7-27, 7-129
Alzouabi	Ayad	Petition	Unknown	9-334
American Trucking Association		Letter	07/27/21	8-12, 8-1
Amos	Angel	Petition	Unknown	9-334
Anael-Bey	Sharif	Petition	Unknown	9-334
Anbinder	Helen	Email	08/10/21	9-291
Anderegg	James P.	Petition	Unknown	9-334
Anderegg	Pamela D.	Petition	Unknown	9-334
Andersen	Kristi	Online Form	10/12/21	4-1
Anderson	Paul	Online Form	10/08/21	6-1
Anderson	CJ	Oral	09/23/21	4-1
Anderson	George	Online Form	09/07/21	4-2
Anderson	Julius	Email	10/13/21	9-291
Anderson	Kirsten	Email	10/13/21	9-291
Anderson	Linda Kay	Petition	Unknown	9-334
Anderson	Stuart	Email	08/19/21	9-291
Andreuzzi	Kelly	Email	08/10/21	9-291
Andrew	Jason	Email	08/10/21	9-291
Andrew	Judith	Email	10/13/21	9-291
Andrews	Keira	Email	08/10/21	9-291
Andromatto	Emily	Petition	Unknown	9-334
Andser	Tadawne	Petition	Unknown	9-334
Angelina	Vera Marie	Email	09/22/21	4-47

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Angier	Claire	Online Form	10/12/21	4-1
Angrand	Ruthnie	Postcard	Unknown	7-89, 7-141, 4-54, 4-125, 7-131
Anostos	Todd	Petition	Unknown	9-334
Anthony	Maya	Postcard	Unknown	7-32, 7-27, 7-129
Antonucci	Giovanni	Online Form	10/12/21	4-1
Anyabwile	Sule	Postcard	Unknown	7-133
Apfel	Sarah	Email	08/10/21	9-291
Appleton	David	Voicemail	10/02/21	3-1
Appleton	Stephanie	Voicemail	10/01/21	5-17
Apraez	Reina	Online Form	10/12/21	4-1
Apt	Lee	Email	08/10/21	9-291
Archer	Brenda	Petition	Unknown	9-334
Archie	Mary	Postcard	Unknown	7-4, 4-104
Arcidiacono	Samuele	Online Form	10/14/21	4-1
Argus	Don	Email	09/03/21	6-1, 5-10, 4-2
ARISE		Letter	10/14/21	8-14, 7-21, 7-133, 6-93, 6-84, 4-61, 4-48, 4-112, 4-1
Armillas	Rona	Email	10/13/21	9-291
Armstrong	Loretta	Email	08/10/21	9-291
Armstrong	Sharon	Online Form	10/12/21	2-1
Arnault	Lynne	Petition	Unknown	9-334
Arnault	Lynne	Petition	Unknown	9-334
Arnett	Renee	Email	10/13/21	9-291
Arnold	John	Email	10/13/21	9-291
Arnold	John	Email	10/13/21	9-291
Arras	Paul	Online Form	10/13/21	4-1
Arseneau	Marie	Petition	Unknown	9-334
Ashley	David	Petition	Unknown	9-334
Ashley	David C.	Letter	10/11/21	4-83, 4-71, 4-50, 4-43, 4-150, 4-149, 4-121, 4-111, 4-109
Ashley	Frances	Petition	Unknown	9-334
Ashley	Hakeem	Postcard	Unknown	7-133
Asiedu	Michael	Postcard	Unknown	7-27, 7-148, 6-3
Askew-Brown	Miranda	Petition	Unknown	9-334
Assoyo	Janet	Email	08/10/21	9-136, 9-135, 9-133, 7-52, 4-2
Aszkler	Paula Granica	Email	10/13/21	9-291
Asztalos	Courtney	Postcard	Unknown	7-27, 7-27, 7-148
Atkins	Ryan	Online Form	10/14/21	4-1
Atwater	Kevin	Email	10/14/21	7-15, 7-133, 7-129, 4-71, 4-55, 4-46, 4-108, 4-1
Auer	Carol	Email	10/13/21	9-291
August	Claire	Email	08/10/21	9-291
Augustin	Jery	Petition	Unknown	9-334
Augustin	Jery	Postcard	Unknown	7-9, 7-32, 4-104
Aurelien	C.	Postcard	Unknown	4-67, 4-46, 4-104
Aurelien	Claudius	Email	09/04/21	9-291
Aurelien	Claudius	Postcard	Unknown	7-32, 7-27, 4-104, 7-148
Aurelien		Postcard	Unknown	7-84, 7-131, 4-54, 7-133
Auringer	Amelia	Online Form	09/21/21	4-47
Austin	James	Postcard	Unknown	4-1, 7-32, 7-133
Austin	Kathleen & Thomas	Online Form	09/23/21	6-9
Austin	Lauren	Email	08/10/21	9-291
Auwaerter	John	Online Form	09/23/21	4-47
Auwaerter	John	Letter	10/14/21	7-72
Avers	Dale	Postcard	Unknown	7-89, 7-138, 4-104, 7-148
Axelrod	Samuel	Petition	Unknown	9-334
Aydin	Doris	Email	08/10/21	9-291
Aylward	Philip	Online Form	10/13/21	5-10, 4-2
Azemar	Theresa	Postcard	Unknown	7-9, 7-27
Azzoto	Laurie	Email	08/10/21	9-291, 5-10

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Azzoto	Laurie	Online Form	09/15/21	5-10
B	E	Email	10/14/21	9-291
B	N	Email	10/13/21	9-291
B	Shalika	Email	10/12/21	9-291
B----	Edward	Petition	Unknown	9-334
B-----	Luv-----	Petition	Unknown	9-334
B.	Elijah	Postcard	Unknown	7-4, 7-27, 7-142
Babala	Sharon	Email	08/10/21	9-291
Babcock	David	Online Form	09/15/21	7-11, 7-11, 2-10
Babcock	David	Petition	Unknown	9-334
Babcock	David	Postcard	Unknown	4-1
Bachin	Stephen	Petition	Unknown	9-334
Bacon	Calista	Petition	Unknown	9-334
Bacon	Henrietta	Petition	Unknown	9-334
Bacon	Janet	Postcard	Unknown	7-138, 7-133, 4-54, 7-1
Bacon	Warren	Email	08/10/21	9-291
Badie	Samantha	Postcard	Unknown	7-32, 7-148, 7-131, 4-1
Baeumler	Bernice	Email	08/19/21	9-291
Baggett-Duggins	Pat	Petition	Unknown	9-334
Bailey	Asiah	Petition	Unknown	9-334
Bailey	Robert	Online Form	09/03/21	5-10
Bailey	Shay	Petition	Unknown	9-334
Bailey	Stacey	Postcard	Unknown	7-89, 7-84, 7-6
Bailey	Stacey	Postcard	Unknown	7-141, 7-131, 4-54
Bailey	Stacy	Postcard	Unknown	7-133
Baines	Lloyd & Bebe	Postcard	Unknown	7-141, 7-131, 7-129
Baker	Anthony	Postcard	Unknown	7-84, 7-148, 7-141
Baker	Chris	Online Form	07/20/21	3-1
Baker	Deborah	Postcard	Unknown	7-89, 7-6, 7-149
Baker	Denise	Petition	Unknown	9-334
Baker	Eddie	Petition	Unknown	9-334
Baker	Elise	Postcard	Unknown	7-1, 7-32, 7-133
Balbuena	Miguel	Online Form	10/14/21	7-95, 7-129, 4-61, 4-55
Baldasare	Doloros	Email	10/14/21	9-291
Baldwin-Sease	Jacqueline	Postcard	Unknown	7-32, 7-27, 7-142
Balenton	George	Petition	Unknown	9-334
Balenton	George	Postcard	Unknown	7-6, 7-148, 7-138
Ball	Christine	Email	08/20/21	9-291
Ball	Linda	Email	08/11/21	9-291
Ballara	Nicole	Postcard	Unknown	7-6, 7-148, 7-141
Balond	N.	Petition	Unknown	9-334
Balter	Dana	Postcard	Unknown	7-9, 7-27, 7-131, 7-1
Balter	Dana	Postcard	Unknown	7-9
Bandelin	Debra	Online Form	08/14/21	4-131
Banerian	Mary	Email	08/10/21	9-291
Banks	Paul	Email	08/11/21	9-291
Bantle	Tom	Email	10/13/21	9-291
Baran	Jenny	Email	10/13/21	9-291
Baratta	Jennifer	Email	08/10/21	9-291
Barba	Matt	Petition	Unknown	9-334
Barbee	Glenn	Petition	Unknown	9-334
Barbour	Daniel	Email	08/10/21	9-291
Bardsley	Alison	Email	10/13/21	9-291
Barfoot	Paul	Petition	Unknown	9-334
Barlow	Jakob	Petition	Unknown	9-334
Barman	Valerie	Petition	Unknown	9-334
Barnard	Melissa	Email	10/13/21	9-291
Barnello	James	Online Form	09/09/21	7-107
Barnes	Kennedy	Petition	Unknown	9-334
Barnes	Towana	Postcard	Unknown	7-6, 7-32, 7-27
Barnett	Ann	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Barnett	Cassidy	Online Form	10/14/21	4-1
Barnett	John	Letter	10/06/21	2-1
Barnett	Rasue	Petition	Unknown	9-334
Barnett	Tamica	Email	10/13/21	9-291
Barnett	Tamica	Petition	Unknown	9-334
Barnett	Ticnesha	Postcard	Unknown	7-6, 7-4, 7-27
Barnhart	Dawn	Email	08/24/21	9-291
Baron	Derrick	Petition	Unknown	9-334
Barr	Sharon	Online Form	07/19/21	2-1
Barr, Jr.	Robert W.	Online Form	07/28/21	4-2
Barrett	Amy	Postcard	Unknown	7-9, 7-6, 7-27
Barrett	Dennis	Email	08/10/21	9-291
Barrett	Sandra	Email	08/12/21	4-1
Barry	Chuck	Online Form	09/10/21	5-10
Barry	CR	Email	09/03/21	5-10
Barry	Gabe	Email	10/13/21	9-291
Bartholomew	Carolyn	Email	10/13/21	9-291
Bartlett	Ted	Online Form	08/18/21	7-68
Bartling	Victoria	Postcard	Unknown	7-6, 7-138, 4-67
Barzee	Jeff	Email	10/14/21	4-2
Barzee	Jeff	Oral	09/01/21	7-84, 7-52, 3-1
Bashmer	Dave	Petition	Unknown	9-334
Bass	Rachel	Online Form	10/14/21	4-1
Bass	Rachel	Postcard	Unknown	7-27, 7-27, 7-148, 4-1
Baum	Carol	Petition	Unknown	9-334
Bauman	Caroline	Petition	Unknown	9-334
Bautista	Gensel	Petition	Unknown	9-334
Baxter	Christopher	Email	08/10/21	9-291
Baxtron	J.	Postcard	Unknown	7-9, 7-133
Bayer	Rosa	Petition	Unknown	9-334
Bayerdelle	Amie	Petition	Unknown	9-334
Baynes	Kenneth	Postcard	Unknown	7-84, 4-67, 4-54
Beach	Megan	Email	08/25/21	9-291
Beaky	Lenore	Email	08/10/21	9-291
Beal	Ruby	Petition	Unknown	9-334
Bean	Jacqueline	Petition	Unknown	9-334
Bean	Jacqueline	Postcard	Unknown	9-253 through 9-257
Bean	Jacqueline	Postcard	Unknown	7-32
Bean	Makeba	Postcard	Unknown	9-253 through 9-257
Bean	Megan	Email	10/13/21	9-291
Bean	Sandra	Petition	Unknown	9-334
Beard	Chanel A.	Petition	Unknown	9-334
Beardi	Linda	Email	10/13/21	9-291
Bebb	Shannon	Email	08/10/21	9-291
Beck	Noah	Email	10/13/21	9-291
Becker	Alice	Email	10/15/21	9-291
Becker	M. James	Online Form	07/19/21	4-2
Becker	Stanley	Email	10/13/21	9-291
Becker	Veronica	Email	08/10/21	9-291
Beckett	Susan	Email	10/13/21	9-291
Beers RN	Celine	Postcard	Unknown	7-32, 7-149, 7-142
Beetle	Karen	Email	08/10/21	9-291
Behler	Stephanie	Email	09/10/21	9-291
Belant	Mary-Kay W.	Postcard	Unknown	7-148, 7-142, 7-131, 4-1
Belcastro	Bernadette	Email	08/19/21	9-291
Belfort-Chalat	Jacqueline	Email	08/31/21	5-10
Bell	Brooke	Email	08/19/21	9-291
Bell	Dennis	Petition	Unknown	9-334
Bell	Joy	Email	08/10/21	9-291
Bell	Lauren	Email	10/13/21	9-291
Bell	Tina L.	Postcard	Unknown	7-131

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Bellamy	Douglas	Petition	Unknown	9-334
Bellany	Jeffrey	Postcard	Unknown	7-129, 4-54, 4-46
Bellini	Diana	Petition	Unknown	9-334
Bellis	Richard	Email	08/11/21	9-291
Beltrone	Paula	Email	08/10/21	9-291
Bem	Robyn	Email	10/13/21	9-291
Benjamin	Edwin	Email	10/13/21	9-291
Benjamin	Ian	Email	07/28/21	7-73
Benjamin	Mary L.	Petition	Unknown	9-334
Benjamin	Mary Lue	Petition	Unknown	9-334
Benjamin	Mary Lue	Petition	Unknown	9-334
Benjamin	Vera	Petition	Unknown	9-334
Benjamin	Vera	Petition	Unknown	9-334
Benjamin	Vera	Petition	Unknown	9-334
Benjamin	Vera	Petition	Unknown	9-334
Bennett	Artie	Postcard	Unknown	7-131
Bennett	Dawn	Email	10/14/21	6-75, 6-41
Bennett	Elizabeth	Postcard	Unknown	7-32, 7-131
Bennett	Elliot	Petition	Unknown	9-334
Bennett	Joe	Online Form	08/31/21	4-1
Bennett	Maggie-Rae	Postcard	Unknown	4-125, 7-21, 7-89
Bentley	Janet	Postcard	Unknown	7-131, 7-129, 7-129
Benton	Sharon	Petition	Unknown	9-334
Bequer	Kerry	Online Form	10/12/21	4-1
Bereck	Leslie	Email	08/10/21	9-291
Berg	Anna	Email	10/13/21	9-291
Berg	Joanna	Email	10/13/21	9-291
Bergan	Pat	Postcard	Unknown	7-141, 7-131, 7-129
Bergsbaken	Bart	Online Form	07/18/21	5-19
Berlant	Rebecca	Email	10/13/21	9-291
Bernard	Andrea	Petition	Unknown	9-334
Berne	Betsy	Email	08/19/21	9-291
bernecker	ralf	Online Form	10/04/21	4-2
Bernstein	Adina	Email	10/13/21	9-291
Bernstein	Judy	Email	10/13/21	9-291
Berry	Diane	Postcard	Unknown	7-27, 7-27, 7-131
Berry	Diane	Postcard	Unknown	7-6, 7-4, 7-9
Berry	John	Oral	09/01/21	6-87
Bershad	Stephanie	Email	08/14/21	9-291
Berson	Robert	Email	08/10/21	9-291
Betsey	Robert L.	Postcard	Unknown	7-27, 7-27, 7-133
Betters	Hannah	Postcard	Unknown	7-149, 7-148, 7-138
Betts	Waliek	Postcard	Unknown	7-133
Betts	Wilesa	Postcard	Unknown	7-4, 7-131, 7-129
Bey	Davine	Postcard	Unknown	7-133
Bey	Joseph	Petition	Unknown	9-334
Bey	Khalid	Postcard	Unknown	9-253 through 9-257
Bey	Khalid	Postcard	Unknown	7-141, 7-131, 4-54
Bey	Schym	Petition	Unknown	9-334
Bey	Supreame	Petition	Unknown	9-334
Beyer	Andrew	Online Form	10/13/21	6-1, 5-10
Beyor	Amorel	Postcard	Unknown	7-4, 7-131, 7-129
Bezy	Robert	Email	08/05/21	9-291
Bhatia	Rachana	Email	10/13/21	9-291
Biesemeyer	Carol	Email	10/14/21	6-92, 6-91, 4-5, 4-1
Bighorse	William K.	Postcard	Unknown	4-141
Bighorse	William K.	Postcard	Unknown	4-141, 7-9
Bigler	Betty	Email	10/13/21	9-291
Billingsley	Tom	Petition	Unknown	9-334
Billingsley	Tommi	Petition	Unknown	9-334
Billingsley	Tommi	Postcard	Unknown	7-32, 7-27, 7-142

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Billingsley	Tommie	Petition	Unknown	9-334
Billue	Mered	Email	10/12/21	9-291
Billue	Twiggy	Postcard	Unknown	7-27, 7-148, 7-141, 7-133
Billue	Twiggy	Oral	08/18/21	7-32, 7-142, 7-134, 7-133
Bines	Tameka	Email	08/10/21	9-291
Binet	Melissa	Letter	07/22/21	8-12, 8-1
Binet	Samantha	Email	08/10/21	9-136, 9-135, 9-133, 7-52, 4-2
Birkemeier	Lee Anne	Email	10/14/21	9-291
Bishop	W	Email	08/10/21	9-291
Bisnett	Laura	Online Form	07/19/21	4-55
Bissett-Hartley	Carol	Postcard	Unknown	7-27, 7-142, 4-104
Bjarnason	Kevin	Postcard	Unknown	7-89, 7-129
Blackman	Jay	Email	10/13/21	9-291
Blackmon	Mark	Online Form	10/12/21	4-1
Blackshear	Hermie	Petition	Unknown	9-334
Blackshear	Keith	Postcard	Unknown	7-9, 7-32, 7-27
Blair	Donald C.	Postcard	Unknown	7-9, 7-27, 7-131, 4-1
Blair	Donald_Nancy Dock	Letter	09/02/21	4-47, 4-34, 4-1
Blair	Tom	Petition	Unknown	9-334
Blais	Steven	Email	10/14/21	9-291
Blalock	Ellen	Postcard	Unknown	7-133
Blank	Rachel	Email	08/10/21	9-291
Blasenheim	Eric	Email	08/10/21	9-291
Bledsoe	Yvonne	Petition	Unknown	9-334
Bleier Long	Amy	Online Form	10/12/21	4-1
Bliss	Leslie	Online Form	09/10/21	4-55, 4-1
Bliven	Margot	Email	08/10/21	9-291
Block	Bruce	Postcard	Unknown	7-6, 7-148, 7-131
Block	Lesley	Email	08/10/21	9-291
Bloodworth	Hasahn	Email	08/12/21	9-291
Bloom	Steve	Email	08/10/21	9-291
Blotcher	Jay	Email	10/16/21	9-291
Blount	Russell	Email	08/10/21	9-291
Blueprint 15		Letter	10/13/21	9-291, 7-6, 7-153, 7-141, 7-138, 7-134, 7-133, 7-129, 4-61, 4-1
Blunt	Patricia	Petition	Unknown	9-334
Blusk	Jennifer	Petition	Unknown	9-334
Bly	David	Email	10/13/21	9-291
Boatman	Kamar	Petition	Unknown	9-334
Boatman	Mazdrine	Petition	Unknown	9-334
Boatwright	Allyn	Petition	Unknown	9-334
Bobis	Kenneth	Written Form	08/18/21	6-34
Bobrycki	Claire	Online Form	08/18/21	4-47
Bodryck	Claire	Petition	Unknown	9-334
Boehm	Diane	Email	08/10/21	9-291
Bogart-Greenlar	Linda	Postcard	Unknown	7-6, 7-141, 7-131
Bohenkamp	Heidi	Email	10/13/21	9-291
Boland	John	Email	08/10/21	9-291
Boland	Katy	Email	08/10/21	9-291
Boleslav	Rudy	Online Form	09/01/21	2-1
Boll	Carol	Email	09/15/21	4-1
Bolter	Dana	Postcard	Unknown	7-9
Bombard	Margaret	Email	08/10/21	7-133, 7-129, 4-55
Bombard	Margaret	Petition	Unknown	9-334
Bombard	Margaret	Postcard	Unknown	7-9, 7-129, 7-148
Bome	Michael	Oral	08/17/21	6-9, 6-7
Bonagura	Nancy	Email	08/10/21	9-291
Bonici	Joshua	Petition	Unknown	9-334
Bonilla	Sharswayla	Postcard	Unknown	7-6, 7-32, 4-54
Bonn	Dana	Postcard	Unknown	7-9, 7-27, 7-148

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Bookal	Giselle	Petition	Unknown	9-334
Boomhower	Deborah	Email	10/14/21	9-291
Boone	Kathleen	Email	08/19/21	9-291
Bordas	Calvin	Postcard	Unknown	7-89
Bordeau	Lisa	Email	08/19/21	9-291
Bordeaux	Natalie	Petition	Unknown	9-334
Borden	Arlene	Letter	09/09/21	7-88, 7-84, 7-107, 6-94, 6-71, 6-11, 4-31, 4-25, 4-2
Bordett	Walter	Email	08/10/21	9-291
Borison	Rebecca	Email	10/13/21	9-291
Bort	Madeleine	Postcard	Unknown	7-27, 7-27, 7-149, 4-1
Bort	Ron	Postcard	Unknown	7-133, 4-54
Bossert	Chris	Petition	Unknown	9-334
Boucounis	Andy	Email	09/14/21	7-50
Boucounis	Andy	Oral	08/18/21	7-50
Boudreau	Kathleen	Email	10/13/21	5-10, 4-2
Boull	Elaine	Email	10/14/21	3-1
Boullosa	Christopher	Online Form	10/05/21	2-1
Bova	Ralph	Postcard	Unknown	7-149, 7-142, 7-141
Bowen	Jocelyn	Petition	Unknown	9-334
Bowens	Gale	Oral	09/09/21	4-55
Bowens	Gale T.	Written Form	09/09/21	4-55
Bowens	Jaquan	Petition	Unknown	9-334
Bowens	Jerome	Petition	Unknown	9-334
Bowens	Rena	Postcard	Unknown	7-89, 7-6, 7-149
Bowers	John	Email	08/10/21	9-291
Bowers	Michael B.	Petition	Unknown	9-334
Bowhall	William	Email	10/06/21	3-1
Boyd	Ballard	Email	08/19/21	9-291
Boyd	Terence	Petition	Unknown	9-334
Boyd	Valerie L.	Petition	Unknown	9-334
Boyer	Greg	Online Form	09/05/21	4-1
Boykin	Marion	Petition	Unknown	9-334
Boyle	Michael	Online Form	08/10/21	4-42
Boyle	Nuala	Email	08/10/21	9-291
Brackett	Caroline	Email	10/03/21	7-93, 4-124
Brad	Celine	Postcard	Unknown	7-6, 7-149, 7-148, 8-3
Bradford	Luther	Petition	Unknown	9-334
Bradford	Theresa	Petition	Unknown	9-334
Bradford	TyJon	Petition	Unknown	9-334
Bradley	Rev. Jesse	Petition	Unknown	9-334
Bradley	Shanay	Petition	Unknown	9-334
Bradly	Mary	Email	09/12/21	6-9
Bradshaw	Sara	Email	10/13/21	9-291
Bradway	Bernice	Petition	Unknown	9-334
Brady	Jerome	Online Form	09/07/21	3-1
Branagan	Willie	Online Form	08/09/21	4-2
Brandariz	Anita	Email	10/13/21	9-291
Branden	Mitchell	Petition	Unknown	9-334
Brandli	Diane	Petition	Unknown	9-334
Brandli	Diane	Postcard	Unknown	7-4, 7-129, 4-104
Brandon	Betty T.	Petition	Unknown	9-334
Brandt	Pamela	Email	08/10/21	9-291
Brandt-Doelle	Sara J.	Petition	Unknown	9-334
Branford	Eddie	Petition	Unknown	9-334
Brannick	Imani	Petition	Unknown	9-334
Brantley	Hattie	Petition	Unknown	9-334
Brantley	John	Email	08/10/21	9-291
Brantley	Nadaya	Petition	Unknown	9-334
Braun	Denise	Email	09/02/21	9-291
Braun	Denise	Postcard	Unknown	7-4, 7-27, 7-131

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Braun	Evan	Online Form	10/12/21	4-1
Braun	Shatavia	Petition	Unknown	9-334
Brecker	Andrea	Email	08/10/21	9-291
Breeland	Gabrielle	Postcard	Unknown	7-89, 7-6, 7-149
Breindel	Monique	Email	10/13/21	9-291
Breitbart	Todd	Email	10/14/21	9-291
Breland	Duane	Petition	Unknown	9-334
Breland	Gary	Petition	Unknown	9-334
Breland	Manny	Petition	Unknown	9-334
Breland	Nerlan	Postcard	Unknown	7-141, 7-131, 4-54
Breland	Richard	Petition	Unknown	9-334
Breland	Tatiana	Petition	Unknown	9-334
Brennan	Leslie	Online Form	10/12/21	4-1
Brey	Mary	Email	10/14/21	9-291
Brhel	Ashley	Email	10/06/21	4-94
Brickley	Mary	Email	08/10/21	9-291
Brickman	Mitch	Postcard	Unknown	7-4, 7-27, 7-129
Brickman	Mitchell	Petition	Unknown	9-334
Briggs	Mark	Postcard	Unknown	7-27
Briggs	Mark	Postcard	Unknown	7-6, 7-27
Bright	Cynthia	Oral	08/17/21	6-9
Bright	Joe	Oral	08/18/21	7-52
Brisson	Nancy	Online Form	09/09/21	4-71
Bristol	James	Written Form	08/18/21	3-1
Broadwater	A.J.	Postcard	Unknown	7-27, 7-131, 4-104
Broadwater	Calvin	Petition	Unknown	9-334
Broadwater	Calvin	Postcard	Unknown	7-32, 7-27, 4-54
Broadwater	Delores	Postcard	Unknown	7-89, 7-149, 4-67
Broadwater	Harold Maurice	Postcard	Unknown	7-133
Brock	Maggie M.	Petition	Unknown	9-334
Brockington	Lisa	Postcard	Unknown	9-264, 7-138, 4-67
Brodbeck	Arlene	Petition	Unknown	9-334
Broder	Gabrielle	Email	10/13/21	9-291
Broderick	Kathleen	Email	08/10/21	9-291
Broderick	Matthew	Email	10/13/21	7-9, 4-71, 4-1
Broderick	Matthew	Online Form	10/13/21	7-9, 4-71, 4-1
Brodsky	Karen	Email	08/19/21	9-291
Bronson	Brett	Email	08/19/21	9-291
Brontley	Michael	Postcard	Unknown	7-133
Brooks	Avery	Petition	Unknown	9-334
Brooks	Avery	Postcard	Unknown	7-9, 7-149, 6-3
Brooks	Brandon	Postcard	Unknown	4-55, 7-89, 7-129, 7-138
Brooks	Jean	Petition	Unknown	9-334
Brooks	Kevin	Petition	Unknown	9-334
Brooks	Kevin	Postcard	Unknown	4-67, 4-46, 4-104
Brooks	Kevin	Postcard	Unknown	7-84, 7-32, 7-133, 4-1
Brooks	Olivia	Email	08/10/21	9-291
Brooks	Vey	Postcard	Unknown	7-89, 7-148, 7-138, 7-1
Brooks	William	Petition	Unknown	9-334
Brooks, Sr.	Brandon	Postcard	Unknown	7-84, 4-67, 4-54
Broome	Clinton	Petition	Unknown	9-334
Broome	Elizabeth	Petition	Unknown	9-334
Brophy	Megan	Email	06/28/21	9-291
Brown	Brian	Email	10/14/21	9-291
Brown	Carzell	Petition	Unknown	9-334
Brown	Cornelia	Postcard	Unknown	4-55
Brown	Darcie	Petition	Unknown	9-334
Brown	Deborah	Petition	Unknown	9-334
Brown	Duncan	Online Form	07/20/21	4-1
Brown	Edmond	Petition	Unknown	9-334
Brown	Emily	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Brown	Erica	Email	08/12/21	9-291
Brown	Haley	Email	08/05/21	9-291
Brown	Harriet	Email	08/10/21	9-291
Brown	James	Petition	Unknown	9-334
Brown	James	Petition	Unknown	9-334
Brown	James	Postcard	Unknown	6-3, 4-46, 4-104
Brown	James J	Email	10/13/21	9-291
Brown	Jim	Online Form	10/06/21	3-1
Brown	John P.	Email	09/06/21	4-73
Brown	Kayla	Petition	Unknown	9-334
Brown	Kristen	Email	08/10/21	9-291
Brown	Mark	Email	08/10/21	9-291
Brown	Marlitha	Petition	Unknown	9-334
Brown	Maurice	Email	08/14/21	9-291
Brown	Maurice	Petition	Unknown	9-334
Brown	Maurice	Petition	Unknown	9-334
Brown	Maurice	Petition	Unknown	9-334
Brown	Michael	Online Form	08/24/21	9-291, 4-1
Brown	Mo	Postcard	Unknown	7-27, 7-133, 7-131
Brown	Ninna	Petition	Unknown	9-334
Brown	Oneysha	Petition	Unknown	9-334
Brown	Priscilla	Petition	Unknown	9-334
Brown	Ralph	Email	08/10/21	9-291
Brown	Robert	Email	08/10/21	9-291
Brown	Shameka	Petition	Unknown	9-334
Brown	Sharon	Petition	Unknown	9-334
Brown	Sharon	Postcard	Unknown	7-89, 7-148, 7-141
Brown	Susann	Email	10/13/21	9-291
Brown	Terrence	Postcard	Unknown	7-133
Brown	Tina	Postcard	Unknown	7-32, 7-27, 7-142
Brown	Tony	Petition	Unknown	9-334
Brown	Valerie	Email	08/10/21	9-291
Brown	Warren	Petition	Unknown	9-334
Brown	William	Email	08/10/21	9-291
Brown Aaron	Paulina	Petition	Unknown	9-334
Brubaker	Heather	Online Form	10/13/21	4-61, 4-104, 4-1
Brubaker	Matthew	Email	10/12/21	9-291
Brubaker	Matthew	Online Form	10/12/21	7-133
Brubaker	Matthew	Online Form	10/12/21	7-8, 4-61, 4-4, 4-104, 4-1
Bruce	Adam	Postcard	Unknown	6-3, 3-1
Bruce	Deanna M.	Postcard	Unknown	7-6, 7-27, 7-27
Brunner	Roy	Email	10/07/21	6-3, 6-1, 4-2, 3-1
Brunner	Roy	Online Form	08/12/21	4-2
Brunson	Tommie	Postcard	Unknown	7-32, 7-27, 7-131
Bryant	Ben	Email	10/13/21	9-291
Bryant	Duane	Postcard	Unknown	9-253 through 9-257
Bryce	Greg	Postcard	Unknown	7-27, 7-148, 7-142
Bubnell	Jackie	Email	08/10/21	9-291
Buchanan	Kim	Email	08/10/21	9-291
Buchanan	Stuart	Online Form	07/16/21	6-9
Bucher	Anne Marie	Email	10/13/21	9-291
Buchwald	Mary	Email	08/11/21	9-291
Buckingham	Darell	Postcard	Unknown	4-55
Buckley	Jeff	Email	10/07/21	6-11, 4-15
Buckley	Mary	Email	09/14/21	4-1
Bucklin	Robb	Petition	Unknown	9-334
Buckvold	Andrea	Email	09/13/21	4-61, 4-46, 4-107, 4-1
Budd	Joan	Email	10/16/21	9-291
Budihardjo	Kristie	Petition	Unknown	9-334
Buechner, RLA	Stephen	Letter	10/14/21	5-17, 4-2
Buehner	Norene	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Bullard	Carol	Email	10/13/21	9-291
Bullard	Madison	Postcard	Unknown	7-6, 7-148, 7-138
Bullis	Eugene	Petition	Unknown	9-334
Bullitt	Stephanie	Petition	Unknown	9-334
Bullitt	Stephanie	Postcard	Unknown	7-32, 8-11
Bullock	Beverly	Email	08/10/21	9-291
Bullock	Gus	Petition	Unknown	9-334
Bullock	Nyatwa	Postcard	Unknown	7-89, 7-141, 4-54, 7-133, 8-11
Bullock	Shirley	Postcard	Unknown	7-32, 7-27, 7-131
Bunce	Casey	Online Form	10/14/21	4-1
Burchin	Carol	Petition	Unknown	9-334
Burdick	Jon	Oral	09/13/21	7-52, 6-11, 4-102, 3-1
Burdick	Mason	Oral	09/13/21	2-1
Burdick	Molly	Online Form	10/13/21	4-1
Burdick	Steve	Voicemail	10/14/21	5-1
Burg	Charlie	Petition	Unknown	9-334
Burgos	Shaday	Email	08/10/21	9-136, 9-135, 9-133, 7-52, 4-2
Burgos	Tamara	Postcard	Unknown	7-32, 7-27, 4-104
Burke	Rayshaw	Postcard	Unknown	7-89, 7-6, 7-149
Burnell	Amy	Online Form	10/13/21	6-3
Burns	Marion	Email	08/19/21	9-291
Burns	Robert	Online Form	07/19/21	6-5
Burns	Tom	Email	08/10/21	9-291
Burrell	Charles	Petition	Unknown	9-334
Burrill	George	Email	08/10/21	9-291
Burroughs	Richard	Petition	Unknown	9-334
Burrows	Bri	Email	10/06/21	4-94
Burton	Alexander	Letter	07/12/21	8-3, 6-3, 4-2
Burton	Matthew	Online Form	10/04/21	3-1
Bush	Catherine	Email	10/12/21	9-291
Bush	Lov'ashia	Postcard	Unknown	7-89, 7-6, 7-149
Bushman	David	Email	08/10/21	9-291
Butin	Oleg	Email	10/13/21	5-10
Butler	Freddie	Postcard	Unknown	7-6, 7-27, 7-27
Butler	Jessica	Petition	Unknown	9-334
Butler	Suzie	Online Form	10/01/21	4-2
Butler	Vanessa	Postcard	Unknown	7-148, 7-141, 7-133
Button	Sara	Online Form	10/13/21	4-1
Butts	James	Petition	Unknown	9-334
Butts	James	Postcard	Unknown	7-4, 7-131, 7-129
Bykov-Green	Estervina	Email	08/10/21	9-291
Byrd	Syeisha	Petition	Unknown	9-334
Byrd	Syeisha	Postcard	Unknown	7-32, 7-27, 7-129
Byrd El, Ed.D	Terrence	Postcard	Unknown	7-133
Byrne	Nick	Email	10/14/21	9-291
Byrnes	Larry	Email	10/01/21	7-52, 4-2, 4-17, 4-102
Byrnes	Larry	Online Form	10/07/21	4-2
Byrnes	Lawrence	Online Form	08/17/21	6-11, 4-2
C	Bonnie	Online Form	08/09/21	3-1
C	Randy	Petition	Unknown	9-334
C.	Elena	Email	08/10/21	9-291
Cabrera	Justin	Email	10/13/21	9-291
Cady	George	Email	09/06/21	6-11, 5-19
Caesar	Bernadette	Petition	Unknown	9-334
Cahill	Kathleen	Email	10/13/21	9-291
Caiazza	Joshua	Online Form	10/14/21	4-1
Caiazza	Roger	Email	10/12/21	7-84, 4-71, 4-2
Caiazza	Timothy	Online Form	10/12/21	4-1
Caiello	Kelsey	Email	10/06/21	4-94
Caiello	Rick	Email	07/16/21	4-41
Cain	Jenna	Email	08/11/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Calazans	Sabrina	Email	10/13/21	9-291
Calder	Rasheada	Petition	Unknown	9-334
Calderon	Meylin	Email	08/11/21	9-135, 9-133, 7-52
Calderwood	Bryce	Online Form	08/02/21	7-31
Caldwell	Rasheada	Postcard	Unknown	7-141, 7-138, 4-54
Calhoun	Tawaina M.	Postcard	Unknown	7-89, 7-133
Call	Andrea	Petition	Unknown	9-334
Calloway	Kenyata	Postcard	Unknown	7-9, 7-6, 7-142
Calloway	Kenyata	Postcard	Unknown	7-84, 4-67, 4-54
Caloia	Lisa	Online Form	07/16/21	3-1
Caltabiano	Jeff	Online Form	10/12/21	4-1
Camacho	Christina	Email	10/13/21	9-291
Camasquib	Jahaira	Postcard	Unknown	7-4, 7-32, 7-131
Cameo	Salomon	Email	08/10/21	9-291
Cameron	Denise	Email	08/12/21	9-291
Cammarata	Mike	Petition	Unknown	9-334
Campana	Maria	Postcard	Unknown	7-21
Campanale	Cynthia	Email	10/14/21	9-291
Campbell	Brenda	Petition	Unknown	9-334
Campbell	Callie	Online Form	08/17/21	4-1
Campbell	Larry	Email	10/15/21	9-291
Campbell	Malcolm	Postcard	Unknown	7-27, 7-129
Campbell	Tashia	Oral	09/09/21	7-133
Campbell	Tashia	Written Form	09/09/21	7-4
Campbell	Vanessa	Postcard	Unknown	7-9, 7-131, 7-129
Canales	Keilly	Email	08/11/21	9-135, 9-133, 7-52
Canasquib	Jahaira	Postcard	Unknown	9-253 through 9-257
Canasquib	Johaira	Postcard	Unknown	7-4, 7-32, 7-131
Candela	Stephen	Online Form	07/27/21	5-10, 4-2
Canery	Kyonnia	Petition	Unknown	9-334
Canfield	Laura	Online Form	10/14/21	4-1
Canning	Jennifer	Email	08/10/21	9-291
Cannon	Bernard	Oral	09/09/21	7-21, 7-146, 7-133
Cannon	K.	Postcard	Unknown	4-67, 4-46, 4-104, 4-55
Cannon	Keith	Postcard	Unknown	7-32, 7-149, 7-133
Capers	Luvenia	Petition	Unknown	9-334
Capers	Sharon	Email	08/03/21	9-291
Capers	Sharon	Petition	Unknown	9-334
Capers	Sharon	Postcard	Unknown	7-133
Capria	Dennis	Oral	09/13/21	4-2
Caputo	Joseph	Letter	08/13/21	8-7, 7-84, 7-52, 6-1, 4-2
Carey	Alexis	Petition	Unknown	9-334
Carioti	Maureen	Online Form	10/12/21	4-1
Carivan	Elizabeth	Email	10/13/21	9-291
Carleton	Cathy	Email	10/17/21	9-291
Carli-Jones	Dorian	Email	10/13/21	9-291
Carlin	Tom	Online Form	08/04/21	4-2
Carlin	Tom	Oral	08/18/21	7-5, 6-3
Carlisle	Karen	Email	10/13/21	9-291
Carlson	Cynthia	Online Form	08/17/21	4-55
Carney	Mary	Postcard	Unknown	7-27, 7-149, 7-141
Carnie	David	Email	10/06/21	4-94
Carnie	David	Oral	08/17/21	7-59, 4-2
Carnie	David M.	Postcard	Unknown	7-89, 7-6, 7-149
Caroli	Nikki	Email	08/03/21	9-291
Carp	Richard	Email	08/11/21	9-291
Carpenter	Jeremy	Email	10/18/21	9-291
Carr	Beth	Email	09/07/21	9-291
Carr	Gabrielle	Email	08/10/21	9-291
Carr	Hope	Email	10/13/21	9-291
Carrier	Kevin	Online Form	09/08/21	5-14

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Carroll	Havilah	Online Form	10/03/21	4-1
Carroll	Mr.	Oral	08/18/21	5-10
Carroll	Timothy	Online Form	10/14/21	6-9
Carroll	Woodruff	Oral	08/17/21	7-65
Carten	Caroline	Email	10/13/21	9-291
Carter	Anja	Postcard	Unknown	7-133
Carter	Beverly	Petition	Unknown	9-334
Carter	Clyde	Postcard	Unknown	7-32, 7-27, 7-27
Carter	Deanna	Petition	Unknown	9-334
Carter	JaQuinn	Petition	Unknown	9-334
Carter	Kadesha	Petition	Unknown	9-334
Carter	Karen	Postcard	Unknown	7-6, 7-131, 7-129
Carter	Nate	Petition	Unknown	9-334
Carter	Penelope	Email	10/13/21	9-291
Carter	Renata	Postcard	Unknown	7-141, 7-131, 4-54
Carter	Tanika	Petition	Unknown	9-334
Carter	Thomas	Petition	Unknown	9-334
Carter	Wendy	Petition	Unknown	9-334
Cartledge	Delores	Petition	Unknown	9-334
Caruso-DiPaolo	Carissa	Postcard	Unknown	4-56, 7-129, 7-138
Case	Diane	Petition	Unknown	9-334
Case	Julie	Email	10/13/21	9-291
Casella	Mary	Email	08/10/21	9-291
Cases	Gil	Petition	Unknown	9-334
Casey	Conerly	Email	10/13/21	9-291
Cashin	Nancy L.	Petition	Unknown	9-334
Cassidy	Erin	Email	08/10/21	9-291
Cassoni	Chris	Petition	Unknown	9-334
Castelli-Hill	Susan	Email	10/13/21	9-291
Castello	Daniel	Online Form	10/08/21	7-52
Castero	Kimberly	Petition	Unknown	9-334
Cathcart	Michelle	Online Form	10/12/21	4-1
Caughey	Constance	Email	10/06/21	6-11, 6-1, 4-2, 3-1
Causey	Tacora	Postcard	Unknown	7-27, 7-27, 7-142
Cauthen	Quandasia	Petition	Unknown	9-334
Cauthen	Tenekeva	Postcard	Unknown	7-32, 7-138, 7-133
Cauthen	Tenekqua	Email	10/12/21	9-291
Cauthen	Tenekque	Petition	Unknown	9-334
Cauthen	Tenequa	Petition	Unknown	9-334
Ceasar	Clarence	Petition	Unknown	9-334
CenterState CEO		Letter	10/08/21	4-1, 9-417 through 9-434
Cerasuolo	Frank	Email	08/10/21	9-291
Cerio	Paula	Written Form	08/18/21	7-113
Cerridwen	Charlene	Email	10/13/21	9-291
Certer	Karen	Postcard	Unknown	7-131, 7-129, 7-129
Cesta	Christopher	Email	09/29/21	6-9, 5-10
Ch---	Gene	Petition	Unknown	9-334
Chaflin	Alexandra	Email	10/13/21	9-291
Chambers	Jemell	Petition	Unknown	9-334
Chambers	Nakeia	Postcard	Unknown	7-9, 7-131
Chambus	Jyvonna	Postcard	Unknown	7-32, 7-131, 7-129
Chandler	Austin	Petition	Unknown	9-334
Chandler	Ellen	Email	08/10/21	9-291
Chaplin	David	Postcard	Unknown	7-32, 7-133, 7-131
Chaplin	David	Postcard	Unknown	7-27, 7-141, 4-54
Chaplin	Lanessa	Petition	Unknown	9-334
Chaplin	Lanessa	Oral	08/17/21	8-12, 8-1, 4-55
Chapman	Justin	Email	09/13/21	7-52
Chapman	Linda	Email	08/10/21	9-291
Chappell	Eileen	Email	10/02/21	7-106
Chappell	Michael	Email	10/02/21	7-106

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Charity	Suzanne	Email	08/10/21	9-291
Charles	Marilyn	Postcard	Unknown	7-89, 7-141, 4-54
Charles	Sean P.	Postcard	Unknown	7-142, 7-131
Charlot	Rutherford	Email	10/13/21	9-291
Charlton	Richard	Email	08/16/21	9-291
Charnay	Katharine	Online Form	10/12/21	7-25
Charter Communications		Letter	10/08/21	7-41 through 7-47, 7-154
Chase	Corena	Email	10/13/21	9-291
Chatfield	Christa	Email	08/10/21	9-291
Chatman	Marlena	Petition	Unknown	9-334
Chatman	Nicole	Postcard	Unknown	7-84, 7-148, 7-133
Chatman	Paulette	Postcard	Unknown	7-141, 7-138, 7-131, 7-9, 7-27
Chavez	Daisy	Email	08/10/21	9-291
Chellis	Michael	Email	10/13/21	5-10, 4-2
Chelton	Mary	Email	08/10/21	9-291
Chen	Lucy	Petition	Unknown	9-334
Chenet	Scott	Email	10/10/21	7-93
Cherry	Carla	Email	10/13/21	9-291
Chesebrough	Kate	Online Form	10/13/21	4-47, 4-1
Chiappa	Russell	Email	10/13/21	9-291
Chiaverini	Ann	Email	08/19/21	9-291
Chisholm	Karen J.	Petition	Unknown	9-334
Chistolini	John & Sharon	Written Form	08/18/21	7-135
Chistolini	John & Sharon	Online Form	09/09/21	7-135
Chouinard	David	Online Form	08/17/21	7-52, 6-36, 6-1, 4-3, 4-2, 3-1
Chovan	Joe	Online Form	07/23/21	3-1
Christensen	Kylie	Email	10/13/21	9-291
Christensen	Monique	Email	08/10/21	9-291
Christiaanase	Vance	Petition	Unknown	9-334
Christie	Joanne	Online Form	10/08/21	7-52
Christoff	Stephanie	Email	10/13/21	9-291
Christoforidis	Babi	Email	08/10/21	9-291
Chu	Yvonne	Email	10/13/21	9-291
Chukueke	Ju'alia	Petition	Unknown	9-334
Chuzi	Jonathan	Email	10/13/21	9-291
Ciaccio	Edward	Email	08/10/21	9-291
Ciano	Paul	Email	10/13/21	9-291
Ciavarri	Paul	Postcard	Unknown	7-133
Ciavarri	Paul	Postcard	Unknown	7-133
Ciccarelli	Mary Anne	Petition	Unknown	9-334
Cicciarelli	Edward	Email	10/13/21	9-291
Cicotta	Colleen	Email	10/14/21	4-1
Citron	Alexander	Online Form	10/04/21	5-10
City of Syracuse		Letter	10/14/21	9-1 through 9-95
Clark	Brendan	Postcard	Unknown	7-32, 7-27, 7-129
Clark	Helen	Petition	Unknown	9-334
Clark	Mary	Online Form	10/12/21	4-1
Clark	May	Postcard	Unknown	7-4, 7-131, 7-129
Clark	Nan	Online Form	09/30/21	4-38
Clark	Patricia	Postcard	Unknown	7-89, 7-27, 7-142, 7-21
Clarke	Earl	Postcard	Unknown	7-141, 7-131, 4-54
Clarke	Rosa	Petition	Unknown	9-334
Clausen	Nancy E.	Petition	Unknown	9-334
Clayton	Patricia	Petition	Unknown	9-334
Cleary	Rosa	Petition	Unknown	9-334
Cleary-Hammerstadt	Mikayla	Postcard	Unknown	7-84
Cleaver	Fred	Online Form	10/04/21	7-38
Clemons	Kenyon	Email	10/12/21	9-291
Clemons	Shaynayshia	Petition	Unknown	9-334
Clemons	Worletta	Postcard	Unknown	7-84, 4-67, 4-54
Clift	Hollyann	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Clinton	Bill	Postcard	Unknown	7-84, 7-27, 7-27
Clinton	Mary	Postcard	Unknown	7-6, 7-27, 4-104, 7-21
Clinton	Regina	Petition	Unknown	9-334
Cloud	Kay	Postcard	Unknown	7-6, 7-32, 7-27
CNY Fair Housing		Letter	10/14/21	9-298 through 9-301
CNY Regional Planning & Development Board		Letter	10/14/21	9-435 through 9-455
Coakley	Joseph	Email	10/13/21	9-291
Cobb	Geraldine	Petition	Unknown	9-334
Coboe	Jane	Oral	09/13/21	6-5, 3-1
Coffee	Toni	Email	10/13/21	9-291
Coffey	Rod	Online Form	09/10/21	4-81
Coffey	Rod	Online Form	07/29/21	4-147
Coffey-Edelman	Lynn	Email	08/10/21	9-291
Coffin	Anthony	Petition	Unknown	9-334
Cohee	Margaret	Postcard	Unknown	7-84, 4-67, 4-54, 7-21
Cohen	Jonathan	Email	10/13/21	9-291
Cohen	Jonathan	Petition	Unknown	9-334
Cohen	Michael	Email	08/21/21	9-291
Cohn	Ava	Petition	Unknown	9-334
Cohn	Mitch	Written Form	09/01/21	4-2
Coker	Earlene	Petition	Unknown	9-334
Coker	Quantrell	Petition	Unknown	9-334
Cole	Kianna	Postcard	Unknown	7-84, 7-133, 4-54
Cole	Kianna	Postcard	Unknown	7-141, 7-131, 4-54, 7-32
Cole	Michele	Email	10/13/21	9-291
Colebrook	Christophe	Oral	08/17/21	4-1
Coleman	Clarise	Postcard	Unknown	7-133
Coleman	Lily	Email	10/13/21	9-291
Coleman	Peter	Email	10/13/21	9-291
Coleman	Saveeon	Postcard	Unknown	7-141, 7-133, 4-54
Coles	Herbert	Email	08/11/21	9-291
Colling	Emma	Email	08/04/21	9-291
Collins	Adronnice	Postcard	Unknown	7-84, 4-67, 4-54
Collins	Bill	Online Form	10/08/21	4-53
Collins	Diane	Written Form	09/09/21	7-32
Collins	Rose	Postcard	Unknown	7-27, 7-27, 7-131
Collins	Terrence	Email	08/10/21	9-291
Collins, Sr.	Charleston	Postcard	Unknown	7-4, 7-131
Colver	Quantrell	Postcard	Unknown	7-133
Coman	Lily	Email	08/10/21	9-291
Come	Lee	Email	10/13/21	9-291
Comer	Dewayne	Email	10/14/21	9-291
Comer	Dewayne	Postcard	Unknown	7-84, 7-148, 4-46
Comer	Dewayne	Postcard	Unknown	7-6, 6-3, 4-104
Comer	Tony	Postcard	Unknown	7-84, 7-133, 4-54
Comer	Tony	Postcard	Unknown	7-141, 7-133, 4-67
Compana	Maria	Postcard	Unknown	7-21
Conant	Douglas	Email	10/13/21	9-291
Concepcion	Amelia	Email	06/25/21	9-291
Condon	Paul	Online Form	07/18/21	3-1
Conerly	David	Petition	Unknown	9-334
Conerly	Justin	Petition	Unknown	9-334
Congel	Erin	Oral	09/23/21	6-90, 4-2
Congel	Erin	Online Form	08/17/21	4-2, 3-1
Connelley	J Patricia	Email	10/13/21	9-291
Conner	Bruce	Postcard	Unknown	7-89, 7-6, 7-149
Connors	Amy	Online Form	07/20/21	6-1
Connors	Amy	Online Form	10/04/21	4-2
Connors	Dennis	Online Form	09/05/21	7-67
Connors	Peggy	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Consuegra	Diego	Email	10/13/21	9-291
Conte	Gabe	Online Form	10/13/21	4-1
Cooke	Samantha	Petition	Unknown	9-334
Cooper	Herbert	Email	10/13/21	9-291
Cooper	Jackie	Oral	09/09/21	4-55
Cooper	Jeffrey	Email	10/13/21	9-291
Cooper	Jermaine	Petition	Unknown	9-334
Cooper	Justin	Petition	Unknown	9-334
Cooper	Michael	Oral	09/09/21	7-129
Cooper	Michael	Postcard	Unknown	7-89, 7-6, 7-149
Cooper	Ozell	Petition	Unknown	9-334
Cooper	Rhonda	Email	08/10/21	9-291
Cooper	Robert	Petition	Unknown	9-334
Cooper	Sandra	Petition	Unknown	9-334
Cooper	Terry	Postcard	Unknown	7-141, 7-131, 7-129
Cooper-Novack	Gemma	Postcard	Unknown	7-27, 7-142, 4-54
Copeland	Charity	Postcard	Unknown	7-84, 7-138, 7-133
Copeland	Dara	Email	10/13/21	9-291
Copes-Johnson, et al	Pauline	Letter	08/24/21	5-10, 4-2
Coplan	Olga	Email	08/10/21	9-291
Corbin	Marion	Email	10/13/21	9-291
Cordano	Karen	Postcard	Unknown	7-141, 7-138, 4-54, 7-89
Core	LaQuan	Postcard	Unknown	7-133
Corell	Jennifer	Online Form	10/13/21	4-1
Cornelius	Eugene	Email	10/13/21	9-291
Cornell	M Doretta	Email	10/13/21	9-291
Correll	Amber	Email	08/19/21	9-291
Corriders	Craig L.	Petition	Unknown	9-334
Cory	Chantel	Petition	Unknown	9-334
Cosby	Helene	Written Form	09/09/21	7-4
Cosgrove	Korianne	Online Form	10/13/21	4-1
Cosgrove	Korianne	Postcard	Unknown	7-4, 7-27, 7-131
Cosgrove	Rebecca	Postcard	Unknown	7-6, 7-4, 7-27, 7-129, 8-17
Cossonneaud	Marie	Petition	Unknown	9-334
Costello	Lucille	Email	08/10/21	9-291
Cotte	Tanita	Petition	Unknown	9-334
Cottet	Gary	Email	10/07/21	3-1
Cotton	James	Petition	Unknown	9-334
Coughlin	Jeremy	Postcard	Unknown	7-9, 7-4, 7-142
Coughlin	Patricia	Email	10/13/21	9-291
Coven	Jacqueline	Email	08/10/21	9-291
Cow	Dennis	Written Form	09/09/21	7-4
Cowles	Clayton	Email	08/10/21	9-291
Cox	Nicole	Online Form	09/21/21	4-2
Cox	Nicole	Online Form	09/21/21	4-2
Cox	Susan	Email	10/13/21	9-291
Coyle	Christopher	Email	08/10/21	9-291
Coyne	Rich	Email	08/11/21	9-135, 9-133, 7-52
Coyne	Richard	Voicemail	10/14/21	5-10
Crafts	Carmen	Written Form	08/18/21	4-47
Craig	Suzzan	Email	08/10/21	9-291
Cramer	Elinor	Email	10/14/21	9-291
Cramer	Mary Anne	Email	09/20/21	3-1
Cramer	Mary Anne	Email	09/20/21	4-4
Crawford	Janice	Petition	Unknown	9-334
Crawford	Jason	Online Form	10/05/21	3-1
Crawford	Kasheba	Petition	Unknown	9-334
Crawford	Kira	Petition	Unknown	9-334
Crawford	Rachel	Online Form	10/13/21	4-1
Crawford	Ranae	Petition	Unknown	9-334
Crawford	Shawn	Postcard	Unknown	9-253 through 9-257

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Crawley	Kahlil	Petition	Unknown	9-334
Crews	Jesse	Email	10/14/21	9-291
Crispell	Russell	Online Form	10/13/21	7-84, 3-1
Cristian	Enrique	Postcard	Unknown	7-9, 7-27
Critser	Lisa	Email	08/02/21	9-291
Crittenden	Craig	Online Form	10/04/21	3-1
Crocker	David	Email	08/10/21	9-291
Crockett	Dana	Petition	Unknown	9-334
Cropper	Clay J.	Petition	Unknown	9-334
Crosby	Emilye	Email	10/13/21	9-291
Crose		Online Form	10/14/21	2-1
Cross	Richard V.	Written Form	09/13/21	4-2
Crossett	Susan	Email	08/10/21	7-9, 7-133, 4-71, 4-55, 4-1
Crump	John S.	Petition	Unknown	9-334
Crutchfield	Cayley	Email	08/11/21	9-291
Cruz	Carmen A.	Postcard	Unknown	7-89, 7-6, 7-149
Cruz	Evelyn	Email	08/11/21	9-135, 9-133, 7-52
Cruz	Kelli	Email	08/10/21	9-291
Cruz	Lindsay	Email	08/10/21	9-291
Cruz	Venies	Email	10/13/21	9-291
Crysler	Robert	Email	08/10/21	9-291
Cuddy	Reagan	Online Form	10/12/21	4-1
Cully	Florence	Email	10/14/21	9-291
Cummings	Johanna	Email	08/19/21	9-291
Cummiskey	Ryan	Online Form	10/14/21	3-1
Cunningham	Mary	Email	08/03/21	9-291, 7-133, 4-71, 4-55
Cunningham	Mary	Oral	08/17/21	7-133, 6-44, 5-13, 4-70, 4-57, 4-55
Cunningham	Mary	Postcard	Unknown	7-84, 7-32, 7-133, 4-71, 4-104
Cunningham	Mary	Postcard	Unknown	7-131, 7-129, 7-129, 7-32, 7-133
Cunningham	VA Felton	Postcard	Unknown	7-4, 7-32, 7-27
Cunningham	Mary	Letter	08/16/21	7-8, 4-71, 4-61
Curcio	Rachel	Postcard	Unknown	7-133
Curley	Ruth	Email	10/13/21	4-2
Currie	Dania	Petition	Unknown	9-334
Currie	J	Online Form	07/22/21	7-19
Curry	Breauna	Postcard	Unknown	7-32, 7-148, 7-133
Curry	Eloise	Petition	Unknown	9-334
Curry	Eric	Postcard	Unknown	9-253 through 9-257
Curry	Ruth Laura	Petition	Unknown	9-334
Curry	Vaughn	Email	10/13/21	9-291
Curtis	Karl	Online Form	07/16/21	3-1
Curtis	McDowell	Petition	Unknown	9-334
Curtis	Sarah	Petition	Unknown	9-334
Cutts	Tapia	Postcard	Unknown	7-133
Czajkowski	Paul	Email	08/06/21	5-19, 4-102
Czajkowski	Paul	Oral	08/17/21	5-19
Czerkies	Michaela	Email	08/18/21	9-291
D----	Mark	Petition	Unknown	9-334
D-----	Ch-----	Petition	Unknown	9-334
D-----	Rob	Petition	Unknown	9-334
D.	Andie	Email	08/10/21	9-291
D.	Monica	Postcard	Unknown	7-6, 7-131, 7-129
D.	E.	Written Form	09/09/21	7-4
D'Agostino	Frank	Online Form	10/12/21	4-1
Da	Rawri	Postcard	Unknown	7-142, 7-133, 7-129, 7-84
Dabbendo	Anthony	Petition	Unknown	9-334
Dacey	Bob	Online Form	08/14/21	4-1
D'Adamio	Louis	Email	08/14/21	9-291
Dahavarian	Sophie	Email	10/14/21	9-291
Dahes-Rahman	Marlena	Petition	Unknown	9-334
Dahir	Abdiweli	Postcard	Unknown	9-264, 7-27, 7-133, 7-84

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Dahir	Safia	Postcard	Unknown	7-32, 7-27, 7-131
Daily	Ernest	Petition	Unknown	9-334
Dair	Janiya	Petition	Unknown	9-334
Daley	Christopher	Online Form	09/14/21	4-2
Dalpan	Victoria	Postcard	Unknown	7-32, 7-27, 7-149, 7-21
Daly	Dennis D.	Email	08/19/21	6-9, 3-1
Daly	Kathryn	Postcard	Unknown	4-1
D'Amore-Klaiman	Chiara	Email	10/14/21	9-291
Dancil	Thandekah	Petition	Unknown	9-334
Dancil	Thandekah	Postcard	Unknown	7-133, 7-32
Dangelo	Joseph	Email	10/13/21	9-291
D'angelo	Nancy	Email	10/16/21	9-291
Danieli	Yael	Email	10/13/21	9-291
Daniels	Antonia	Email	10/13/21	9-291
Daniels	Crystal	Petition	Unknown	9-334
Daniels	Demetria	Petition	Unknown	9-334
Daniels	Demetrius	Petition	Unknown	9-334
Daniels	Gary	Email	10/06/21	4-2
Daniels	Gary	Written Form	09/23/21	4-2
Danquer	Austin	Online Form	08/02/21	4-135
Danzy	Alfred	Petition	Unknown	9-334
Dapson	Jessica	Petition	Unknown	9-334
Darbey	A----	Petition	Unknown	9-334
Darbey	Tyanna	Petition	Unknown	9-334
Darcangelo	Amanda	Online Form	10/12/21	4-1
Darisan	Earl	Postcard	Unknown	7-133
Darisan	Earl S.	Postcard	Unknown	7-6, 7-32, 7-142, 7-1
Darius	Maria	Petition	Unknown	9-334
Darke	Erin	Email	08/10/21	9-291
Darling	Gregory	Email	08/10/21	9-291
Darling	Robert	Email	10/13/21	9-291
Darlington	James	Oral	08/18/21	7-62, 7-52, 6-3, 6-11, 3-1
Das	Sonali	Email	08/10/21	9-291
Datlow	Ellen	Email	10/13/21	9-291
Dattes	Penny	Online Form	10/09/21	4-102
Daumbia	Soulemane	Petition	Unknown	9-334
Dauria	Stephanie	Email	08/11/21	9-291
Dausman	Kyle	Online Form	10/12/21	4-1
Davie	Stephen	Email	10/13/21	9-291
Davies	Morgan	Email	08/12/21	9-291
Davies	Robert	Online Form	08/17/21	6-36
Davik	Karlianus	Email	08/10/21	9-136, 9-135, 9-133, 7-52, 4-2
Davis	Alfonso	Postcard	Unknown	9-253 through 9-257
Davis	Anthony	Postcard	Unknown	7-9, 7-142, 7-129
Davis	Ashley	Postcard	Unknown	7-6, 7-27, 7-131
Davis	Celestine	Petition	Unknown	9-334
Davis	Celestine	Postcard	Unknown	7-84, 4-67, 4-54
Davis	Charles	Petition	Unknown	9-334
Davis	Elenore O.	Postcard	Unknown	7-141, 7-131, 4-54
Davis	Elmore	Email	08/10/21	9-291
Davis	Elmore	Petition	Unknown	9-334
Davis	Elmore	Petition	Unknown	9-334
Davis	Eveanne	Petition	Unknown	9-334
Davis	Felicia	Postcard	Unknown	9-253 through 9-257
Davis	I.	Postcard	Unknown	7-84, 4-67, 4-54, 5-13
Davis	James	Petition	Unknown	9-334
Davis	Karen	Email	08/10/21	9-291
Davis	Kennedy	Postcard	Unknown	7-89, 7-6, 7-149
Davis	LaFrances	Petition	Unknown	9-334
Davis	Lawrence C.	Petition	Unknown	9-334
Davis	Mary	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Davis	Michael	Petition	Unknown	9-334
Davis	Nalizere	Petition	Unknown	9-334
Davis	Osupat	Postcard	Unknown	7-149, 7-141, 4-54
Davis	Rondasha	Petition	Unknown	9-334
Davis	Rory	Petition	Unknown	9-334
Davis	Ruth C.	Petition	Unknown	9-334
Davis	Ryan	Email	08/10/21	9-291
Davis	Ryedell	Petition	Unknown	9-334
Davis	Ryedell	Postcard	Unknown	7-32, 7-27, 7-142, 7-52
Davis	Ryedell	Postcard	Unknown	7-133
Davis	Ryedell	Written Form	09/09/21	7-4
Davis	Scott	Email	10/13/21	9-291
Davis	Stephen K.	Postcard	Unknown	7-89, 7-141, 4-54
Davis	Stephenie	Petition	Unknown	9-334
Davis	Thomas	Petition	Unknown	9-334
Davis	Tony	Email	08/10/21	9-291
Davis	William A.	Petition	Unknown	9-334
Davis	Yahkeif	Postcard	Unknown	7-4, 7-32, 7-133
Davis	Yvonne	Petition	Unknown	9-334
Davis	Zoya	Petition	Unknown	9-334
Davis Jr	Homer L	Postcard	Unknown	9-264, 7-6, 6-3
Davis-El	Marcus	Postcard	Unknown	7-133
Dawson	Bonnie	Postcard	Unknown	9-253 through 9-257
Dawson	Bonnie	Postcard	Unknown	7-84, 7-32, 7-133
Dawson	Jonathan	Postcard	Unknown	4-67, 4-46, 4-104, 7-84
Dawson	Lacey	Postcard	Unknown	7-84, 7-32, 7-133
Dawson-Rhodes	Juanita	Email	10/13/21	9-291
Day	D	Email	10/13/21	9-291
Day	Robert	Petition	Unknown	9-334
de Ben	C	Email	08/10/21	9-291
De Jesus	Angel	Petition	Unknown	9-334
De Lucia	Mike	Online Form	08/27/21	8-1, 4-1
Dean	Kevin	Online Form	07/17/21	5-19, 4-88, 4-1
Deane-Miller	Susan	Email	10/13/21	9-291
Deapo	Janice	Email	07/17/21	6-65
Deaton	Brantley M.	Written Form	08/18/21	4-66, 4-47, 4-1
Deaver	Theresa	Online Form	07/19/21	6-5
DeBartolo	Michael	Email	08/10/21	9-291
Debnam	Erick	Petition	Unknown	9-334
deBruin	Grant	Online Form	10/14/21	6-1
Decker	Travis	Online Form	10/12/21	4-1
DeCook	Daniel	Online Form	09/01/21	4-2
DeDonato	Elizabeth	Email	08/10/21	9-291
Deer	John	Petition	Unknown	9-334
Deferio	James	Online Form	08/15/21	4-2
DeForest	Scott	Postcard	Unknown	7-27, 7-131, 4-54, 4-1
DeFrancisco	Linda	Online Form	10/11/21	6-43, 3-1
DeGennaro	Paul	Online Form	09/21/21	4-135
DeGrand	Shawn	Online Form	07/22/21	3-1
DeGraw	Jenny	Email	10/13/21	9-291
DeJesus	Daniel	Postcard	Unknown	9-264, 7-149, 6-3
DeLee	Tedisha	Postcard	Unknown	7-89, 7-6, 7-149
DeLee	Willeshia	Petition	Unknown	9-334
Delillo	Don	Voicemail	10/14/21	4-141
DeLine	Jamie	Email	08/10/21	9-291
Dell'Abate	Lucas	Petition	Unknown	9-334
DelleDonne	Kaitlyn	Petition	Unknown	9-334
Dellostritto	Don	Oral	08/31/21	4-141
DeLorenzo	George	Online Form	10/14/21	7-62, 3-1
Demarais	Claire	Email	08/11/21	9-291
Demas	Allison	Email	08/19/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
DeMott	John	Online Form	10/14/21	4-70
Demro	Delaney	Postcard	Unknown	7-9, 7-21, 7-32, 7-89, 7-142
Deng	Fanny	Petition	Unknown	9-334
Dennis	R-----	Petition	Unknown	9-334
Dennis	Ronald	Petition	Unknown	9-334
Denson	Jay	Postcard	Unknown	7-89, 7-129, 7-133
Denson	Ron	Email	10/13/21	9-291
Denson	Sheila	Oral	09/09/21	4-55
Denton	Elaine	Online Form	10/14/21	4-70, 4-18, 4-104, 4-1
Denton	Elaine	Postcard	Unknown	7-133, 7-131, 7-129, 4-1
Denton	Matthew	Online Form	10/14/21	4-18, 4-1
DeNunzio	Laura	Email	10/14/21	9-291
Denzer	Kyle	Online Form	10/13/21	6-1
Denzer	Kyle	Online Form	09/24/21	4-2
Deo	James	Petition	Unknown	9-334
Derbyshire	Aimee	Petition	Unknown	9-334
DeReza	William	Email	10/18/21	9-291
Deroche	Claire	Email	10/13/21	9-291
DeRosa	James	Email	08/04/21	9-291
Derrigan	Sarah	Email	08/03/21	9-291
Desch	Samantha	Email	08/10/21	9-291
Desire	Toto	Postcard	Unknown	7-32, 7-131, 4-54
Desrochers	Madeleine	Online Form	10/13/21	4-1
DeStefano	Nicholas	Email	10/13/21	9-291
DeVault	Ileen	Email	08/10/21	9-291
DeVeto	Christina	Email	08/10/21	9-291
Devin	Alexandra S	Email	10/13/21	9-291
Devinney	Claudia	Email	10/13/21	9-291
DeVoise	Barbara	Petition	Unknown	9-334
Devone	Kevin	Email	10/13/21	9-291
Devore	Wynetta	Petition	Unknown	9-334
Dewey	Deborah	Email	08/10/21	9-291
Dewitt	Kathleen	Email	10/14/21	9-291
Dexter	Denise	Petition	Unknown	9-334
Dexter	Latesha	Petition	Unknown	9-334
Dexter	Vivian	Postcard	Unknown	7-84, 4-67
Deyo	Austin	Online Form	10/12/21	4-1
Deyo	Dave	Online Form	07/19/21	3-1
D'Hollander	Raymond	Online Form	09/16/21	6-31
Diaz	Angel	Email	08/10/21	9-136, 9-135, 9-133, 7-52, 4-2
Diaz	David	Postcard	Unknown	7-133
DiBella	Yulia	Email	08/10/21	9-291
DiCarlo-Schermerhorn	Pamela	Online Form	10/14/21	5-17
Dickerson	Nadine	Petition	Unknown	9-334
Dickson	Margaret	Petition	Unknown	9-334
DiDomizio	Alice	Email	10/13/21	9-291
Diehl	Margrit	Email	10/14/21	4-1
Dietrich	Marianne	Email	08/10/21	9-291
Dieuveut	Mushetu	Postcard	Unknown	7-131, 7-129, 4-54
Dill	Kim	Postcard	Unknown	7-6, 7-32, 7-131
Dillenbeck	Colleen	Online Form	07/28/21	4-2
Dinkins	Ja-Kyree	Petition	Unknown	9-334
Dippolito	Steve	Online Form	09/28/21	7-66, 7-62, 6-3, 4-2, 2-4
DiSalvo	Jacqueline	Email	08/11/21	9-291
Diss	Marybeth	Email	08/13/21	9-291
Dixie	Desmond	Petition	Unknown	9-334
Dixie	Walt	Postcard	Unknown	7-6, 7-27, 7-148
Dixon	Sharlene	Petition	Unknown	9-334
Dixon	Tiffany	Petition	Unknown	9-334
Doble	Paul	Email	08/18/21	9-291
Dock	Nancy	Postcard	Unknown	7-27, 7-27, 7-133, 4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Dodge	Jeff	Online Form	10/06/21	7-52, 6-5, 6-23, 6-2, 6-1, 4-2
Dodge	Laura	Online Form	08/16/21	6-1
Doelle	Klaus	Petition	Unknown	9-334
Doerr	Donald	Oral	08/17/21	8-3, 7-59, 6-9, 5-10, 4-70, 4-2
Doherty	Amy	Petition	Unknown	9-334
Doherty	Amy	Petition	Unknown	9-334
Doherty	James	Postcard	Unknown	4-1
Dohner	Ilsa	Email	08/04/21	9-291
Dohner	Ilsa	Postcard	Unknown	7-27, 7-89, 7-129, 8-3
Doles	Steven	Petition	Unknown	9-334
Dolor	Stephanie	Email	08/10/21	9-291
Donaghue	Deborah	Online Form	10/12/21	4-1
Donahue	Douglas E	Email	10/13/21	9-291
Donaldson	Alaya	Postcard	Unknown	6-3
Donaldson	Quientell	Postcard	Unknown	7-89, 7-6, 7-133, 7-129
Dondell	Pastor Andre	Postcard	Unknown	7-138, 7-131, 4-54
Donegan	Robert	Email	08/10/21	9-291
Doner	Allison	Petition	Unknown	9-334
Doner	Megan	Petition	Unknown	9-334
Donnelly	Craig	Online Form	10/13/21	4-1
Donnelly	Diane	Online Form	08/17/21	7-2, 6-11, 4-2
D'Onofrio	Hannah	Petition	Unknown	9-334
Donohue	John P.	Email	08/13/21	7-133, 4-67, 4-63, 4-55, 4-123, 4-110, 4-102, 4-1
Doohar Jr	George	Online Form	10/14/21	6-1, 3-1
Doran	Calypso	Petition	Unknown	9-334
Dorodell	Amy	Petition	Unknown	9-334
Dorsey	Mary	Written Form	09/23/21	4-70, 4-1
Dougherty	Bob	Online Form	10/14/21	4-1
Doupe	Ronald	Online Form	08/03/21	4-1
Dow	Darlene	Petition	Unknown	9-334
Dow	Darlene	Postcard	Unknown	7-27, 7-27, 7-149
Dowling	Andrew	Online Form	10/14/21	4-1
Downing	Kathryn	Email	09/12/21	6-1, 4-71, 4-4
Downing	Quinnese	Petition	Unknown	9-334
Downtown Committee of Syracuse		Letter	10/08/21	4-1, 9-116 through 9-131
Doyle	Liana	Email	10/13/21	9-291
Dozier	Eddie Wilcox	Petition	Unknown	9-334
Dreher-Wiberg	Paul	Online Form	09/06/21	4-1
Driesen	David	Email	10/13/21	9-291
Driesen	David	Postcard	Unknown	7-84, 7-32, 7-133
Driscoll	Anna	Online Form	10/13/21	4-1
Driscoll	Carol	Email	08/10/21	9-291
Driscoll	Christine	Email	10/19/21	9-291
Driscoll	Joseph	Email	09/07/21	4-1
Driscoll	Therese	Online Form	10/13/21	4-1
Du	Rawri	Postcard	Unknown	7-142, 7-133, 7-129
Dubinsky	Jesse	Email	08/10/21	9-291
Ducett	Deborah	Petition	Unknown	9-334
Duda	Karen	Email	08/11/21	9-291
Duda	Robert	Online Form	07/16/21	7-98
Dudczak	Craig	Online Form	10/14/21	6-64, 6-57, 6-52, 4-55
Dudden	Paul	Email	09/24/21	6-5
Dufresne	Michael	Petition	Unknown	9-334
Dugan	Tonya	Email	08/11/21	9-291
Duggan	Thomas	Email	08/11/21	9-291
Dugger	Chaontavia	Postcard	Unknown	7-133
Duggins	Alice	Petition	Unknown	9-334
Duke	Cathy	Email	08/11/21	9-291
Duke	Paul	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Dumser	N	Email	10/13/21	9-291
Dunbar	David	Petition	Unknown	9-334
Dunbar	David	Postcard	Unknown	9-264, 7-149, 7-141
Dunbar	Earl	Email	08/10/21	9-291
Duncan	Gavin	Postcard	Unknown	7-139
Dunham	Clarence	Petition	Unknown	9-334
Dunlap	Carolin	Postcard	Unknown	7-133
Dunlap	Carolyn	Petition	Unknown	9-334
Dunlap	Carolyn	Petition	Unknown	9-334
Dunlap	Zachariah	Email	08/23/21	9-291
Dunn	Brian	Email	10/13/21	9-291
Dunn	Bridget	Online Form	10/12/21	4-1
Dunn	L. M.	Petition	Unknown	9-334
Dunn	Mary	Online Form	10/13/21	4-1
Dunn	Mary	Written Form	07/23/21	4-1
Dunn	Patrick	Online Form	08/02/21	7-104
Dunsworth	Kodiak	Postcard	Unknown	9-264, 7-27, 4-104
Durden	Barbara	Petition	Unknown	9-334
Durden	Shaola	Petition	Unknown	9-334
Durham	Curtis	Postcard	Unknown	7-131, 7-129, 7-129
Durkin	Ellen	Petition	Unknown	9-334
Durkovic	Ned	Email	10/14/21	9-291
Dwyer	Carole	Online Form	09/01/21	8-3
Dwyer	Victoria	Petition	Unknown	9-334
Dwyer	Paul	Online Form	09/02/21	6-1
Dziekonski	Thadeus	Email	08/10/21	9-291
E.	Kirsten	Email	08/10/21	9-291
Eatman	Dannielle	Postcard	Unknown	7-133
Eberst	Spencer	Petition	Unknown	9-334
Ebner	Hannah	Postcard	Unknown	7-32, 7-27, 7-131
Eckert	Terry	Petition	Unknown	9-334
Eddy	Melissa	Petition	Unknown	9-334
Edelman	Howard	Email	08/10/21	9-291
Edelson	Lynne	Email	08/27/21	9-291
Edinger	Elizabeth	Petition	Unknown	9-334
Edinger	John	Oral	08/18/21	6-9, 6-3, 4-2
Edmonds	Sandra	Email	10/13/21	9-291
Edmunds	Susan	Petition	Unknown	9-334
Edwards	Daryl	Petition	Unknown	9-334
Edwards	Delisha	Petition	Unknown	9-334
Edwards	Joann	Oral	09/09/21	8-3, 7-84, 7-107, 6-32
Edwards	Michael	Petition	Unknown	9-334
Edwards	Michael	Postcard	Unknown	9-264, 7-27, 7-138, 7-133
Edwards	Michael	Postcard	Unknown	7-149, 7-141, 6-3, 7-133
Edwards	Michael	Postcard	Unknown	7-142, 7-133, 7-131
Edwards	Michael	Postcard	Unknown	7-32, 7-27, 7-27, 7-133
Edwards	Mike	Postcard	Unknown	7-6, 4-67, 4-104
Edwards	Mike	Postcard	Unknown	7-27, 7-149, 7-138
Edwards	Mike	Postcard	Unknown	7-89, 7-148, 7-148
Edwards	Mike	Postcard	Unknown	4-46
Edwards	Odessa	Postcard	Unknown	7-4, 7-129, 4-104
Edwards	Saralee	Email	08/10/21	9-291
Edwards	Shauntia	Postcard	Unknown	7-9, 7-27, 7-149
Edwards	Tiere	Postcard	Unknown	7-133
Edwards	Tirona P.	Petition	Unknown	9-334
Efinger	Tanner	Email	10/13/21	9-291
Egan	Bonnie	Email	08/10/21	9-291
Egan	Tamara	Online Form	09/01/21	8-1, 4-1
Egnoto	O. J.	Online Form	10/09/21	5-10
Eichhorn	Lawrence	Online Form	09/01/21	4-2
Eidt	Mary	Online Form	09/07/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Eiholzer	Paul	Online Form	09/03/21	4-1
Eiholzer	Paul	Petition	Unknown	9-334
Eiholzer	Sue	Online Form	09/01/21	4-1
Eiholzer	Sue	Petition	Unknown	9-334
Eiholzer	Sue	Postcard	Unknown	4-67, 4-54, 4-104, 5-13
Eiland	Anthony	Petition	Unknown	9-334
Eiland	Walter	Postcard	Unknown	7-27, 7-131, 4-104
Eivers	Ellyn	Petition	Unknown	9-334
Elan	Susan	Email	10/13/21	9-291
Elder	Jamilah	Email	08/10/21	9-291
Eldridge	Marjorie	Written Form	09/08/21	7-93
Eldridge	Siena	Petition	Unknown	9-334
Elijah	Carlton	Petition	Unknown	9-334
Elkins	William	Email	08/14/21	9-291, 4-1
Eller	Abby	Email	08/19/21	9-291
Ellerbs	Quwaku	Written Form	09/09/21	4-61
Ellerby	Quwanka	Oral	09/09/21	7-84
Ellerby	Quwanka	Oral	09/09/21	4-55
Ellerby	Quwanka	Postcard	Unknown	7-6
Ellerby	Quwanka	Postcard	Unknown	7-89, 7-6, 7-133, 7-1
Ellert	Rose M.	Petition	Unknown	9-334
Elliot	William	Online Form	07/17/21	6-5
Ellis	Judith	Email	08/10/21	9-291
Ellman	Faye	Email	08/10/21	9-291
Elman	David	Email	08/10/21	9-291
Emm	Amy	Email	07/27/21	7-99, 7-64, 6-11, 3-1
Emmi	Anthony	Email	08/10/21	9-135, 9-133, 7-52
Emmi	Anthony	Email	08/10/21	9-135, 9-133, 7-52
Emmi	Anthony	Email	08/10/21	9-135, 9-133, 7-52
Emmi	Anthony	Online Form	09/08/21	4-2
Emmi	Carmen	Email	08/31/21	7-53
Emmi	Carmen	Email	08/10/21	9-135, 9-133, 7-52
Emmi	Carmen	Email	08/10/21	9-135, 9-133, 7-52
Emmi	Carmen	Email	08/10/21	9-135, 9-133, 7-52
Emmi	Carmen	Online Form	08/30/21	7-53
Emmi	Carmen	Oral	08/17/21	8-12, 8-1, 4-2
Emmi	Joe	Online Form	08/17/21	7-52
Emmi	Marc	Email	08/10/21	9-135, 9-133, 7-52
Emmi	Marc	Letter	07/22/21	8-12, 8-1
Emmi	Marc	Online Form	08/17/21	4-2
Emmi	Ross	Email	08/17/21	9-135, 9-133, 7-52
Emmi	Ross	Email	08/17/21	9-135, 9-133, 7-52
Emmi	Ross	Email	08/17/21	9-135, 9-133, 7-52
Emmi	Ross	Email	08/17/21	9-135, 9-133, 7-52
Emmi	Tony	Online Form	08/17/21	3-1
Emmi Commerce Park Development, et al.		Letter	10/10/21	9-132 through 9-136
Emmi Farms		Email	10/13/21	4-2
Emmons	Jim	Petition	Unknown	9-334
Emord	Diane	Petition	Unknown	9-334
Endreny	Anna	Postcard	Unknown	7-89, 7-6, 7-141
Endreny	Theodore	Petition	Unknown	9-334
Endreny	Theodore	Postcard	Unknown	7-27, 7-148, 7-148, 7-77, 7-78
Endres	Rebecca	Email	08/10/21	9-291
Engle	Laurie E	Email	10/13/21	9-291
English	Tyrone	Petition	Unknown	9-334
Enoch	Isom	Postcard	Unknown	7-133
Epstein	Stephanie	Petition	Unknown	9-334
Epstein	William	Email	10/13/21	9-291
Erdman	James	Online Form	10/12/21	4-1
Erdman	Maria	Online Form	10/14/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Ervin	Chabete	Petition	Unknown	9-334
Ervin	Linda	Email	10/12/21	9-291
Ervin	Linda	Petition	Unknown	9-334
Erwin	Steve	Oral	08/18/21	7-84, 7-65, 7-52, 6-1, 5-10, 4-55, 4-44
Esce	Francesca	Online Form	10/14/21	4-1
Escobar	Brian	Email	10/12/21	9-291
Eskin	Alexa	Petition	Unknown	9-334
Espey	Nylaiza	Postcard	Unknown	7-133
Esposito	Dana	Email	08/10/21	9-291
Essig	Christina	Postcard	Unknown	7-27, 7-149, 4-67
Essig	Grae	Email	08/10/21	9-291
Estee	Sarah	Email	08/10/21	9-291
Eudell	Theresa	Petition	Unknown	9-334
Euler	Chris	Petition	Unknown	9-334
Eure	Devon	Petition	Unknown	9-334
Eure	Erik	Postcard	Unknown	7-89, 7-142, 7-131
Evanoff	Barbara	Written Form	09/13/21	7-120, 6-25, 4-40, 4-39
Evans	Jason	Email	10/14/21	4-71, 4-68, 4-120, 4-116
Evans	Jason	Online Form	10/14/21	7-9, 4-70, 4-68, 4-120, 4-116, 4-1
Evans	Malik	Petition	Unknown	9-334
Evans	Steve	Petition	Unknown	9-334
Evans	Teresa	Email	10/13/21	9-291
Evans	Tim	Petition	Unknown	9-334
Everest	Kareem	Petition	Unknown	9-334
Evers	Glenn	Postcard	Unknown	7-6, 7-141, 4-54, 7-133
Eversley	Diana	Petition	Unknown	9-334
Everst	Kareem	Petition	Unknown	9-334
Exline	Jolene	Petition	Unknown	9-334
Exline	Jolene	Postcard	Unknown	7-6, 7-32, 4-104
Eysaman	Jeff	Postcard	Unknown	7-133
Eysaman	Jeffrey	Petition	Unknown	9-334
Fabi	Rachel	Postcard	Unknown	7-27, 7-27, 7-27
Fadden	Carol	Petition	Unknown	9-334
Fadden	Mike	Postcard	Unknown	7-32, 7-149, 7-133
Fagan	Kevin	Postcard	Unknown	7-148, 7-133, 4-46
Fagan	Michael	Online Form	08/04/21	4-135, 4-132
Fager	John	Email	08/10/21	9-291
Faggan	Imani	Petition	Unknown	9-334
Faherty	Sam	Petition	Unknown	9-334
Fair	Oceanna	Email	08/03/21	9-291
Fair	Tommie	Postcard	Unknown	7-89, 7-6, 7-149
Fair	Tommie	Postcard	Unknown	7-131, 7-129
Faley	Melissa	Online Form	10/13/21	4-1
Fallon	Jean	Email	10/19/21	9-291
Fallon	Megan	Voicemail	08/18/21	7-33
Faloon	Michael	Email	10/13/21	9-291
Families for Lead Freedom Now		Letter	10/12/21	9-302 through 9-314
Farah	Fadumo	Postcard	Unknown	9-264, 7-133, 7-131
Farah	Mohamed	Petition	Unknown	9-334
Fargas	Jorge	Postcard	Unknown	7-27, 7-27, 7-131
Farimani	Hamideh	Email	10/13/21	9-291
Farr	Heather	Online Form	09/08/21	5-13
Farrell	Nina	Email	08/11/21	9-291
Farrington	Patricia	Online Form	10/14/21	4-1
Farrow	Ebony	Postcard	Unknown	7-9, 7-21, 7-32
Farrow	Michelle	Postcard	Unknown	7-6, 7-4, 7-131
Farstadt	Jane	Postcard	Unknown	7-142, 7-129, 4-54
Faruol	Charles	Online Form	07/20/21	5-19
Fast	Wendy	Email	08/10/21	9-291
Faulkner	Sheniqua	Email	10/13/21	9-291
Febles	Theresa	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Febres	Joshua	Email	08/11/21	9-135, 9-133, 7-52
Fecht	Sarah	Email	08/11/21	9-291
Feck	Carlin	Online Form	10/14/21	4-1
Fedrizzi	Nathan	Online Form	10/12/21	4-61, 4-1
Feeney	Krista	Email	08/10/21	9-291
Fegley	August	Email	06/28/21	9-291
Fehling	Kenneth	Email	10/13/21	9-291
Felder	Belinda	Petition	Unknown	9-334
Felder	Daron	Petition	Unknown	9-334
Felder	Denise	Petition	Unknown	9-334
Feldman	Jeremy	Email	10/13/21	9-291
Felton-Cunningham	V.A.	Postcard	Unknown	7-4, 7-32, 7-27
Fenell	Mariesa	Postcard	Unknown	9-253 through 9-257
Fenton	William	Email	08/10/21	9-291
Ferguson	Pat	Online Form	07/20/21	7-37, 4-55
Ferguson	Pat	Oral	09/23/21	4-61
Ferguson	Sean	Petition	Unknown	9-334
Ferrara	Kimberly	Online Form	10/13/21	4-1
Ferrara	Ralph	Email	08/10/21	9-291
Ferraro	Joseph	Email	10/13/21	9-291
Ferrigno	Mary	Email	08/19/21	9-291
Ferris	Michael	Email	07/19/21	6-11
Ferris	Rick	Online Form	09/16/21	4-1
Fetes	Bradley	Online Form	10/13/21	4-1
Fichter	Nick	Petition	Unknown	9-334
Fields	Ilithia	Petition	Unknown	9-334
Figueroa	Aracelis	Email	10/13/21	9-291
Figueroa	Nelly	Postcard	Unknown	7-138, 7-133, 4-67
Filiccea	Eileen	Postcard	Unknown	7-32, 7-27, 7-131
Filipkowski	Andrea	Email	09/30/21	4-94
Filton	Beryl	Email	08/10/21	9-291
Finazzo	Geraldine	Email	08/10/21	9-291
Finnerty	Patricia	Email	08/10/21	9-291
Finnigan	James	Email	10/13/21	9-291
Fiorante	Samantha	Email	08/07/21	9-291
Fisch	Anna	Email	08/10/21	9-291
Fischer	Joseph	Online Form	08/11/21	4-47
Fischer	Miriam	Email	08/02/21	9-291
Fisher	Dan	Email	09/22/21	6-9, 4-1
Fisher	Daniel J.	Letter	08/17/21	6-9, 4-1
Fisher	Steve	Online Form	09/14/21	4-61, 4-56, 4-32
Fitzgerald	Gary	Email	08/08/21	9-291
Fitzgerald	Gary	Online Form	10/12/21	4-1
Fitzpatrick	Meghan	Email	08/19/21	9-291
Fixler	Michael	Email	08/04/21	9-291
Flagg	Anika	Postcard	Unknown	7-9, 7-32, 7-27, 7-27, 7-131, 4-104
Flake-Bunz	Colette	Email	10/13/21	9-291
Flanagan	Donovan	Petition	Unknown	9-334
Flandera	Matt	Postcard	Unknown	7-133
Flanders	Peggy	Petition	Unknown	9-334
Fleder	Marilyn	Email	08/10/21	9-291
Fleishman	Ellen	Email	08/10/21	9-291
Fletcher	Audrey	Oral	08/26/21	8-12, 8-1, 7-60, 7-6, 7-52, 7-5, 7-21, 7-2, 6-5, 5-13, 5-10, 4-55
Flint	Emma	Postcard	Unknown	9-264, 7-148, 4-104
Flores	Amanda	Online Form	10/12/21	4-61
Flores	Amanda	Online Form	10/12/21	4-1
Flores	Irene Aurora	Petition	Unknown	9-334
Flournory	Tavores	Postcard	Unknown	7-141, 7-138, 4-54
Floyd	Michael	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Fluger	Martin	Email	08/10/21	9-291
Flynn	Chris	Postcard	Unknown	7-6, 7-148, 7-138
Flynn	Christine	Postcard	Unknown	7-84, 7-32, 7-133
Flynn	Elizabeth G	Email	10/13/21	9-291
Foisy	Lawrence	Letter	07/20/21	6-5
Folgar	Elaine	Email	08/10/21	9-291
Fontaine	Karla	Postcard	Unknown	7-32, 7-129
Fontaine	Lucien	Email	10/13/21	9-291
Foote	Tracy	Email	08/10/21	9-291
Foran	Alisa	Petition	Unknown	9-334
Forbes	Bob	Petition	Unknown	9-334
Ford	Ayo D.	Postcard	Unknown	7-32
Ford	Caneisha	Postcard	Unknown	7-89, 7-6, 7-149
Ford	Lara	Email	10/13/21	9-291
Ford	Lee	Voicemail	10/04/21	4-143
Ford	Shadir	Postcard	Unknown	7-133
Ford	Zack	Postcard	Unknown	7-6, 7-141, 6-3, 4-1
Forest	Sahleem	Postcard	Unknown	7-133
Forest	Sahleem	Postcard	Unknown	7-89, 7-84, 7-148
Form Letters (via ACLU/NYCLU)		Letter	Various	9-253 through 9-257
Forman	Laura	Email	08/10/21	9-291
Forman	Roz	Email	08/11/21	9-291
Forrest	William	Email	10/13/21	9-291
Forrester	Lori A.	Postcard	Unknown	7-6, 7-27, 7-131
Fort	Peggy	Email	08/10/21	9-291
Foster	Hope	Email	10/13/21	9-291
Fotopoulos	Tiffany	Email	10/14/21	9-291
Fowler	Darlene	Petition	Unknown	9-334
Fox	Vicki	Email	08/10/21	9-291
Fox	Victoria	Email	10/13/21	9-291
Fraad	Tess	Email	08/10/21	9-291
Fraidowitz	Bruce	Email	10/13/21	9-291
Franceschi	Betti	Email	08/19/21	9-291
Franits	Dawn	Postcard	Unknown	9-264, 7-89, 4-54
Franits	Linnea	Postcard	Unknown	7-6, 7-149, 7-148, 4-104
Franklin-King	Karin	Postcard	Unknown	7-89, 7-148, 7-138
Fraser	Dominique	Petition	Unknown	9-334
Frazier	Joyce	Petition	Unknown	9-334
Frazier	Taquan	Petition	Unknown	9-334
Frazier	Tiara	Postcard	Unknown	7-89, 7-6, 7-149
Fredette	John	Voicemail	08/31/21	3-1
Freedman	Chris	Petition	Unknown	9-334
Freeman	Beth Jane	Email	08/10/21	9-291
Freeman	Beth Jane	Email	10/13/21	9-291
Freeman	Denise	Postcard	Unknown	7-149, 7-148, 7-138
Freeman	Quanasha	Postcard	Unknown	7-6, 7-142, 4-104
Freewoman	Faith	Email	08/10/21	9-291
Frehling	Russell	Email	08/10/21	9-291
French	Dan	Voicemail	09/29/21	8-3
French	Sara	Email	09/27/21	4-47
French	W.	Email	10/06/21	4-2
Frey	Brenda	Email	08/10/21	9-291
Friedman	Eleanor	Email	10/13/21	9-291
Friedman	John	Postcard	Unknown	7-84, 7-133, 4-54
Friedman	Shani	Email	08/10/21	9-291
Fritz	Jane	Email	08/10/21	9-291
Frome	Paula	Email	10/13/21	9-291
Frost	Jack	Online Form	08/27/21	7-52, 4-55, 4-2
Fudge	Catherine	Postcard	Unknown	7-129, 7-148, 8-6, 8-8
Fuentes	Jeysi	Email	08/11/21	9-135, 9-133, 7-52
Fuller	M.	Email	07/20/21	6-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Fuller	Marg	Online Form	08/09/21	3-1
Fuller	Margaret	Online Form	07/20/21	2-1
Fuller	Robert	Petition	Unknown	9-334
Fulson	Robert	Email	08/10/21	9-291
Fulton	Albert	Petition	Unknown	9-334
Funderberg, Jr.	Gerald R.	Postcard	Unknown	7-133
Funerburg	Gerald	Email	10/14/21	9-291
G	Andrew	Email	08/19/21	9-291
G-----	K.	Petition	Unknown	9-334
G.	Bob	Written Form	08/18/21	8-2
Gabor	Beth	Email	08/19/21	9-291
Gabore	Betty	Postcard	Unknown	7-27, 7-141, 6-3
Gabriel	Betty	Postcard	Unknown	7-89, 7-141, 4-54
Gaertner	Diane	Email	10/13/21	9-291
Gaffney	Perri	Email	10/13/21	9-291
Gagliano	Jamie	Postcard	Unknown	7-32, 7-27, 7-148
Gagnon	Terese	Email	08/10/21	9-291
Gaines	Nora	Email	08/10/21	9-291
Gainey	Shynique	Petition	Unknown	9-334
Gaiter	Irma	Postcard	Unknown	7-84, 7-148, 7-133
Gaj	Margaret	Petition	Unknown	9-334
Galdon	Mirelsa	Petition	Unknown	9-334
Gallagher	Aileen	Online Form	10/13/21	4-1
Gallagher	Debra	Online Form	08/18/21	7-52
Gallagher	Michael	Email	08/22/21	5-13, 4-65
Gallagher	Michael	Oral	08/17/21	4-62, 4-101
Gallagher	Michael J.	Letter	08/02/21	4-142
Gallagher	Samantha	Petition	Unknown	9-334
Gall-Maynard	Maggie	Postcard	Unknown	7-6, 7-131, 4-67, 7-27
Galuska	Katie	Email	08/10/21	9-291
Ganhewa	Savini	Email	08/10/21	9-291
Gannon	Michael	Email	08/10/21	9-291
Ganson	Julia	Postcard	Unknown	7-27, 7-133, 7-131
Gant	John	Email	08/11/21	9-291
Gantenbein	Jen	Email	08/10/21	9-291
Garcia	Carol	Email	08/11/21	9-135, 9-133, 7-52
Garcia	Hennessy	Postcard	Unknown	7-27, 7-89, 7-129
Garden	Rebecca	Postcard	Unknown	7-27, 7-27, 7-27
Gardner	Frank	Oral	08/31/21	6-3
Gardner	James Dean	Petition	Unknown	9-334
Garland	Charles	Letter	10/14/21	5-10, 4-2
Garland	Charles	Oral	09/09/21	7-84, 7-21, 5-10, 4-2
Garland	Charles	Written Form	09/09/21	7-4
Garland	Lillian	Email	08/03/21	9-291
Garland	Charles,	Letter	07/27/21	8-12, 8-1
Clark, Stephens	Bishop Carl, Rev. Kevin			
Garofalo	Jack	Postcard	Unknown	7-84, 7-32, 7-133
Garrett	Steve	Online Form	07/20/21	6-1
Gary		Online Form	07/20/21	7-51, 4-86
Gaston	Carmello	Postcard	Unknown	7-141, 7-131, 7-129
Gaston	Kathy	Postcard	Unknown	7-141, 7-131, 7-129
Gates	Addison	Petition	Unknown	9-334
Gates	Kristin	Postcard	Unknown	7-32, 7-131, 7-129
Gates	Lara	Email	08/10/21	9-291
Gauris, Sr	Christopher	Online Form	07/19/21	4-1
Gaut	Michael	Postcard	Unknown	7-89, 7-84, 7-148
Gavigan	Ryan	Postcard	Unknown	7-9, 7-27
Gavin	Hannah	Online Form	10/13/21	7-84, 7-32, 7-133, 6-5, 6-1, 4-57
Gayden	Jackie	Postcard	Unknown	7-84, 7-32, 7-133
Gayden	Jackie	Postcard	Unknown	7-89, 7-141, 7-133

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Geist	Sheila	Email	10/13/21	9-291
Geitner	Geri	Online Form	10/12/21	4-1
Geitner	Matt	Online Form	10/12/21	8-1
Geloff	Brenda	Email	10/15/21	5-10, 4-55, 4-2, 4-104
Gera	Paul N.	Letter	09/10/21	6-1, 4-61
Gerald	Wolfe	Email	08/10/21	9-291
Gerard	Caitlyn	Postcard	Unknown	7-9, 7-27, 7-131
Gerhardt	Richard	Postcard	Unknown	7-27, 7-133
Gerhorz	Joe	Postcard	Unknown	9-253 through 9-257
Gerrard	Caitlyn	Postcard	Unknown	7-9, 7-27, 7-131
Gerstein	Nora	Email	08/10/21	9-291
Gessini	Noah	Online Form	10/14/21	4-1
Getz	George	Postcard	Unknown	7-9, 7-131
Gewanter	Barrie	Oral	09/09/21	6-7, 4-105
Gewanter	Barrie	Petition	Unknown	9-334
Gewanter	Barrie	Postcard	Unknown	7-84, 7-32, 7-133, 7-27
Gewanter	Barrie H.	Letter	10/10/21	9-291, 7-6, 7-15, 7-149, 7-138, 7-133, 7-129, 4-61, 4-1
Giancola	Charles	Email	07/20/21	4-135
Giancola	Charlie	Online Form	07/26/21	4-135
Giardine	Rex	Letter	10/14/21	4-61, 4-60, 4-1
Giardine	Rex	Online Form	10/14/21	4-61
Gibbons	Colleen	Email	10/13/21	9-291
Gibbons	Colleen	Postcard	Unknown	7-6, 7-27, 4-54, 7-1, 7-129
Gibbons	Emily	Email	10/14/21	9-291
Gibbs	Daniesha	Petition	Unknown	9-334
Gibbs	Daniesha	Petition	Unknown	9-334
Giblin	Gina	Email	10/04/21	7-93, 4-124
Giblin	Thomas	Email	08/10/21	9-291
Gibson	Amy	Email	08/19/21	9-291
Gibson	Anna	Email	08/19/21	9-291
Gibson	Emma	Postcard	Unknown	7-148, 7-138, 4-67
Gibson	Gary	Voicemail	09/23/21	3-1
Gibson	Nicole M.	Petition	Unknown	9-334
Gibson	Stephen A.	Petition	Unknown	9-334
Gigantelli	James	Online Form	10/11/21	5-10
Gilbert	Jay	Email	08/10/21	9-291
Gilbert	Tavia	Email	10/13/21	9-291
Gilchriest	Diane	Online Form	09/13/21	6-1
Giles	C.	Postcard	Unknown	7-84, 7-148, 7-141
Giles	John H.	Petition	Unknown	9-334
Gill	Nicole	Postcard	Unknown	7-142, 7-131, 7-129
Gill	Stephanie	Postcard	Unknown	7-89, 7-4, 7-141, 7-21, 7-32
Gillotte	Nicholas	Email	10/13/21	9-291
Gillson	Patrick	Email	10/02/21	7-93, 4-124
Gioia	Phillip	Online Form	08/22/21	5-10
Girard	Mark	Petition	Unknown	9-334
Givens	Jamie	Postcard	Unknown	7-32, 7-142, 4-104
Glansberg	Linda	Email	08/18/21	9-291
Glasford	Felicia	Petition	Unknown	9-334
Glasner	William	Email	08/10/21	9-291
Glass	Jen	Petition	Unknown	9-334
Glaubman	Jane	Email	10/12/21	9-291
Glenn	Lashay	Postcard	Unknown	7-4, 7-27, 7-129
Glenn	Molly	Email	10/13/21	9-291
Glinks	Richard	Email	10/13/21	9-291
Glod	April	Postcard	Unknown	7-9, 7-27, 4-104
Glor	Cheryl	Email	09/09/21	6-1
Glover	Lee	Petition	Unknown	9-334
Glover	Lee	Postcard	Unknown	7-89, 7-141, 4-54

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Gluck	Stanley	Email	06/30/21	7-32, 7-21, 7-133, 7-133, 7-13, 7-1, 6-3
Gluck, MSW	Stanley	Online Form	10/14/21	7-32
Gluszek	Katherine	Online Form	10/12/21	4-1
Glynn	Doreen	Email	08/10/21	9-291
Glynn	Mr.	Oral	09/08/21	7-52
Goddard	Rachel	Email	08/10/21	9-291
Godfrey	Mahlon	Petition	Unknown	9-334
Godley	Joe	Postcard	Unknown	9-253 through 9-257
Godley	Mahlon J.	Postcard	Unknown	7-138, 7-131, 4-54
Godley	Mahlon Joe	Petition	Unknown	9-334
Godmilow	Jill	Email	08/10/21	9-291
Godwin	Nadine	Email	08/10/21	9-291
Goe	Nyezee	Postcard	Unknown	7-84, 4-67, 4-104
Goehle	Todd	Email	08/05/21	9-291
Goehle	Todd	Petition	Unknown	9-334
Goehle	Todd	Petition	Unknown	9-334
Goetz	Valerie	Email	08/04/21	9-291
Goff	Theresa	Postcard	Unknown	7-84, 7-149, 7-148
Gogel	Germaine	Email	10/13/21	9-291
Gokey	Denise	Email	08/16/21	9-291
Goland	Karyl	Email	10/13/21	9-291
Gold	Leslie	Email	08/10/21	9-291
Gold	Zoie	Postcard	Unknown	7-9, 7-32, 7-89, 7-138
Goldberg	Beth	Postcard	Unknown	7-32, 7-27, 7-27
Goldberg	Donna	Email	08/11/21	9-291
Goldberg	Harriet	Email	08/10/21	9-291
Goldberg	Roy	Email	08/10/21	9-291
Goldberg	Sarah	Petition	Unknown	9-334
Golden	Rodneshia	Postcard	Unknown	7-133
Goldman	Eleanor	Email	08/10/21	9-291
Goldstein	Allan	Email	08/10/21	9-291
Goldstein	Sharon	Email	08/10/21	9-291
Goldstein	Sonia	Email	10/13/21	9-291
Goldstein	William	Email	08/10/21	9-291
Golub	Sophie	Email	10/14/21	9-291
Gomes	Susan	Email	08/10/21	9-291
Gonzalez	Britney	Postcard	Unknown	7-4, 7-131, 7-129
Gonzalez	Julian	Postcard	Unknown	7-89, 7-131, 7-129, 7-133
Gonzalez	Matthew	Email	08/10/21	9-291
Gonzalez	Monica G.	Petition	Unknown	9-334
Goodall	Bettina	Email	08/19/21	9-291
Goode	Griffin	Petition	Unknown	9-334
Goode	Terrance	Petition	Unknown	9-334
Goode	Terrance	Postcard	Unknown	7-84, 4-67, 4-54
Gooding	Lara	Postcard	Unknown	7-6, 7-27, 7-141
Goodman	Jacinta	Petition	Unknown	9-334
Goodman	Tyrone	Petition	Unknown	9-334
Goodwater	Andrea	Email	10/13/21	4-55, 4-2, 4-15
Goodwater	Andrea	Written Form	09/08/21	4-54, 4-16
Goodwater	Andrea	Written Form	09/08/21	4-2
Goodwin	Cathy	Email	10/14/21	4-2
Goodwin	Julia	Petition	Unknown	9-334
Goodwin	Ronald	Postcard	Unknown	7-133
Goot	Renee	Email	10/13/21	9-291
Gordon	Barbara	Postcard	Unknown	7-89, 7-32, 7-133, 7-27
Gordon	Barbara	Postcard	Unknown	7-84, 7-32, 7-133, 7-89, 7-129
Gordon	Barry	Oral	08/17/21	4-1
Gordon	Barry	Petition	Unknown	9-334
Gordon	Barry	Postcard	Unknown	7-27
Gordon	Barry & Barb	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Gordon	Barry & Barb	Postcard	Unknown	7-6, 7-27, 7-131
Gordon	Wendy	Online Form	10/13/21	7-106, 6-66, 4-28
Gorham	Brad	Online Form	10/12/21	4-1
Gorman	Celia	Email	10/13/21	9-291
Gorman	Roberta	Email	08/10/21	9-291
Gorman	Teresa	Online Form	10/12/21	4-1
Gorney	Edith	Petition	Unknown	9-334
Gorney	Jeffrey	Online Form	09/06/21	4-70
Gorshi	Emma	Postcard	Unknown	7-84, 7-148, 7-138, 7-32
Gorshi	Emma Johnson	Postcard	Unknown	7-77, 7-129, 7-138
Gostev	Daniella	Petition	Unknown	9-334
Gostev	Elizabeth	Petition	Unknown	9-334
Gowing	Sandra J.	Postcard	Unknown	7-27, 7-27, 7-27, 4-1
Goyle	Rivita	Petition	Unknown	9-334
Gozan	Julie	Postcard	Unknown	7-89, 7-142, 7-133
Gozan-Keck	Ruby	Postcard	Unknown	7-89, 7-133, 7-131
Grabish	Paige	Petition	Unknown	9-334
Grabowski	Terry	Letter	08/30/21	3-1
Grace	Jhadi	Petition	Unknown	9-334
Grace	Mesha	Postcard	Unknown	7-6, 7-27, 7-27
Gradoni	Peter	Email	08/10/21	9-291
Graffly	Diane	Postcard	Unknown	7-89, 7-4, 7-27
Graham	Elizabeth	Email	08/10/21	9-291
Graham	Holly	Email	10/13/21	9-291
Graham	Lamont	Petition	Unknown	9-334
Graham	Shawn	Postcard	Unknown	7-1, 7-32
Graham	Tonya	Petition	Unknown	9-334
Graham	Velma	Petition	Unknown	9-334
Grainger	Lorenzo	Petition	Unknown	9-334
Grande	Ms.	Postcard	Unknown	7-138, 7-133, 4-46
Grande	Patricia	Email	10/13/21	9-291
Grande	Paula	Email	10/13/21	9-291
Granger	James	Email	08/11/21	9-291
Grant	Alex	Postcard	Unknown	7-89, 7-133, 4-67
Grant	Alex	Postcard	Unknown	7-9, 7-32, 7-131
Grant	Cyrus	Petition	Unknown	9-334
Grant	Kyle	Postcard	Unknown	7-4, 7-27, 7-27
Grant	Michael A.	Petition	Unknown	9-334
Grapka	David	Email	08/10/21	9-291
Grasso	Mary	Email	10/13/21	9-291
Graves	Christian	Email	10/13/21	9-291
Graves	Nakisha	Petition	Unknown	9-334
Graves-Wright	Cheryl	Postcard	Unknown	7-133
Gray	Charles	Email	10/13/21	9-291
Greco	Leah	Petition	Unknown	9-334
Greean	Irine	Oral	09/01/21	4-2
Green	Deqwan	Petition	Unknown	9-334
Green	Diana	Email	08/16/21	7-133
Green	Diana	Petition	Unknown	9-334
Green	Diana	Petition	Unknown	9-334
Green	Diana	Postcard	Unknown	7-133
Green	Etienne	Postcard	Unknown	7-141, 4-54, 4-46
Green	Karla	Petition	Unknown	9-334
Green	Naisha	Petition	Unknown	9-334
Green	Natalie	Email	10/13/21	9-291
Greenbaum	Karen	Email	08/10/21	9-291
Greenberg	Barbara	Email	08/10/21	9-291
Greenblatt	Rebecca	Email	07/23/21	9-291
Greene	Claude C.	Postcard	Unknown	7-9, 7-6, 7-27
Greene	Dawn	Petition	Unknown	9-334
Greene	Dominic	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Greene	Leslei	Petition	Unknown	9-334
Greene	Michael	Postcard	Unknown	7-9, 7-6, 7-27
Greenfield	Eric	Online Form	09/02/21	7-99, 7-129, 4-61, 4-15, 4-1
Greenfield	Karen	Online Form	10/13/21	4-1
Greenfield-Sanders	Isca	Email	10/13/21	9-291
Greenhouse	Sara	Email	08/11/21	9-135, 9-133, 7-52
Greenlar	Michael	Postcard	Unknown	7-32, 7-148, 7-141
Greenman	Fran	Email	08/11/21	9-291
Greenstreet	Carol	Email	08/10/21	9-291
Gregg	Daria	Email	08/10/21	9-291
Gregg	Holland	Email	08/13/21	6-9, 6-38, 6-28, 6-11
Gregg	Holland	Oral	08/17/21	6-9, 6-38, 6-28
Gregory	Destiny	Postcard	Unknown	7-131, 7-129, 7-129
Grevelding	Jeffrey	Online Form	08/16/21	6-1
Greytak	Emily	Email	10/15/21	9-291
Grifasi	Karly	Postcard	Unknown	7-148, 7-138, 4-67
Griffen	Meghan	Online Form	09/14/21	4-1
Griffin	Barbara	Petition	Unknown	9-334
Griffin	Natalie	Email	08/05/21	9-291
Griffin Chambers	Tonya	Postcard	Unknown	7-131, 7-129, 7-129
Griffin-Nolan	Ed	Online Form	10/14/21	4-82
Griffith	Susan K.	Petition	Unknown	9-334
Griffith	Susan K.	Petition	Unknown	9-334
Griffiths	Elizabeth	Postcard	Unknown	7-32, 7-27, 7-131
Griffiths	Rachel	Postcard	Unknown	7-6, 7-4, 7-142
Griggs	Linda	Postcard	Unknown	7-32, 7-141, 7-131
Grimes	Diane	Email	08/10/21	8-6, 8-2, 7-133, 4-71, 4-53, 4-49, 4-4, 4-1
Grimes	Ligia	Postcard	Unknown	7-133
Grimm	Gary	Email	08/12/21	9-291
Grimmage	Raynard	Postcard	Unknown	7-133
Grinnals	Ian	Oral	09/23/21	7-62, 6-5, 6-1
Griswold	Rosalyn	Petition	Unknown	9-334
Griswold	Rosalyn	Postcard	Unknown	7-131, 7-129, 7-129
Gronau	Maureen E	Online Form	10/14/21	2-1
Gross	Carol	Email	08/11/21	9-291
Grossman	Peggy	Email	08/04/21	9-291
Grosso	Dave	Email	07/24/21	7-92
Gruber	Samuel	Postcard	Unknown	7-9, 7-27, 7-133
Gruvman	Edna	Email	10/13/21	9-291
Gugger	Valerie	Email	08/03/21	9-291
Guillaume	Anthonu	Email	08/10/21	9-291
Guillaume	Velisha	Postcard	Unknown	7-9, 7-32, 7-148, 4-1
Gunn	Cassandra	Postcard	Unknown	7-89, 7-84, 7-149
Gunn	LeChe	Postcard	Unknown	7-32, 7-133, 4-67, 7-129
Gunn	Nathan	Email	09/30/21	7-88, 7-107, 6-82, 6-56, 6-28, 6-28, 5-10, 4-56, 4-2, 4-17
Gunnip	Colleen	Letter	07/22/21	8-12, 8-1
Gunter	Belinda	Postcard	Unknown	7-6, 7-27, 7-142
Gurarac	Mawut	Petition	Unknown	9-334
Gursky	Geoffrey M.	Letter	08/11/21	4-52, 4-47
Gussow	Joan	Email	08/11/21	9-291
Gustafson	William	Postcard	Unknown	7-133
Gustus	Elijah	Petition	Unknown	9-334
Gustus	Joanne	Petition	Unknown	9-334
Guthrie	Mary	Email	08/10/21	9-291
Gutierrez	Matthew	Petition	Unknown	9-334
Gwinn	Elias	Email	10/12/21	9-291
Haas	David	Online Form	10/14/21	4-1
Habeeb	Shanaia	Postcard	Unknown	7-141, 7-131, 4-54
Haddix	Marcelle	Postcard	Unknown	7-27, 7-27, 7-129, 8-6, 8-8
Hagemann	Mary	Postcard	Unknown	7-27, 7-141, 7-133

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Hagenmayer	David	Online Form	08/09/21	6-1
Halay	Elaine	Email	10/13/21	9-291
Hale	Melleny T.	Petition	Unknown	9-334
Haley	Bob	Petition	Unknown	9-334
Haley	Kathy	Postcard	Unknown	4-55, 7-9, 7-133
Haley	Robert	Oral	08/17/21	4-43, 4-1
Hall	[Undecipherable] & Ida M.	Postcard	Unknown	7-89, 7-133, 4-67, 7-1
Hall	Bryant	Postcard	Unknown	7-84, 7-27, 7-133
Hall	Christina	Petition	Unknown	9-334
Hall	Dave	Email	10/13/21	9-291
Hall	Jim	Email	09/07/21	4-1
Hall	Rick	Petition	Unknown	9-334
Hall	Sichi & Ida	Postcard	Unknown	7-6, 7-149, 7-138
Hall	Vanessa	Postcard	Unknown	7-32, 7-27, 7-142
Hall	Vivian	Postcard	Unknown	7-6, 7-32, 7-141
Hallagan	Jean	Online Form	08/21/21	5-10
Halliburton	Wayne	Postcard	Unknown	7-133
Halliday	Deb	Email	08/10/21	9-291
Hallihan	John	Online Form	08/26/21	6-1
Hallow	Leah	Email	10/14/21	9-291
Halloway	Robert	Postcard	Unknown	7-4, 7-32, 7-27
Hamilton	Sharon	Petition	Unknown	9-334
Hamilton	Susan	Written Form	08/25/21	4-71, 4-61, 4-116
Hamilton	Tamara	Petition	Unknown	9-334
Hamlin-Navias	Jennifer	Online Form	08/07/21	4-1
Hammans	Degef	Petition	Unknown	9-334
Hammons	Terese	Petition	Unknown	9-334
Hand	Bryce	Email	10/15/21	4-2
Handzel	Michele	Email	08/30/21	9-291
Hanesworth	Phyllis	Petition	Unknown	9-334
Hankin	Baxter	Online Form	10/12/21	4-1
Hankin	Baxter	Postcard	Unknown	7-9, 7-27, 7-27
Hanrahan	Joanne	Email	08/10/21	9-291
Hanrahan	Lynda	Online Form	08/05/21	4-1
Hanse	Christopher	Online Form	07/16/21	7-9, 4-104, 4-1
Hansen	Andrea	Email	08/10/21	9-291
Hansen	Janet	Email	08/10/21	9-291
Hansen	Katryn	Online Form	10/12/21	4-1
Hansen	Sarah	Postcard	Unknown	7-32, 7-142, 7-131
Hanshaw	Ashley	Email	08/10/21	9-291
Hanson	Anita	Email	10/14/21	9-291
Hanson	Bruce	Petition	Unknown	9-334
Hanson	Chris	Petition	Unknown	9-334
Harbin	Kimberly	Petition	Unknown	9-334
Harbison	Susan	Email	10/08/21	4-1
Harden	S.	Postcard	Unknown	7-133
Hardin	Dylan	Petition	Unknown	9-334
Hardy	Earl	Petition	Unknown	9-334
Hares	Eugene	Postcard	Unknown	7-9, 7-149, 7-133
Hares	Kyle	Email	09/13/21	9-134
Hares	Kyle	Online Form	08/17/21	7-132, 5-10
Hargrett	Derrick	Postcard	Unknown	6-3, 4-46, 4-104
Hargrett	Derrick	Postcard	Unknown	7-148, 7-141, 7-138, 7-27
Hargrett	Derrick	Postcard	Unknown	7-89, 7-27, 7-133
Haring	Marissa	Petition	Unknown	9-334
Haritatos	John	Online Form	09/03/21	4-1
Harlow	Carmen	Letter	09/14/21	4-151
Harlow	Richard	Email	10/13/21	9-291
Harp	Dale	Petition	Unknown	9-334
Harper	Dara	Postcard	Unknown	7-27, 7-149, 7-142

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Harper	Ken	Postcard	Unknown	7-32, 7-149, 7-148
Harper	Shonette	Petition	Unknown	9-334
Harrington	Emmalia	Email	08/10/21	9-291
Harrington	Syreeta	Petition	Unknown	9-334
Harrington-ONEILL	Moe	Oral	09/23/21	7-93
Harris	Alexander	Email	08/19/21	9-291
Harris	Arianna	Postcard	Unknown	7-21, 7-32, 7-133, 8-6, 8-8
Harris	Arlaina	Postcard	Unknown	7-6, 7-4, 7-32
Harris	Catherine C.	Postcard	Unknown	7-4, 7-131, 7-129
Harris	Ericson	Online Form	10/14/21	4-1
Harris	Holly	Postcard	Unknown	9-264, 7-149, 7-148
Harris	James	Petition	Unknown	9-334
Harris	Jason	Postcard	Unknown	7-6, 7-138, 7-133, 4-54
Harris	Perri	Email	10/02/21	7-93, 4-124
Harris	Rhonda	Postcard	Unknown	7-129
Harris	Tara	Petition	Unknown	9-334
Harris	Tara	Postcard	Unknown	7-6, 7-89, 7-129
Harris	Tara	Postcard	Unknown	7-32, 7-148, 7-138
Harris	Tara	Postcard	Unknown	7-6, 7-4, 7-129
Harris	Tara	Postcard	Unknown	7-32, 7-89, 7-129, 7-133, 7-149
Harris	Tara	Written Form	09/09/21	7-4
Harris	William	Petition	Unknown	9-334
Harris	William	Petition	Unknown	9-334
Harris-El	Shante	Postcard	Unknown	7-6, 7-27, 4-54
Harrison	Arthur	Postcard	Unknown	7-32, 7-27, 7-142
Harrison	Bob	Petition	Unknown	9-334
Harrison	Dan	Petition	Unknown	9-334
Harrison	Denise	Petition	Unknown	9-334
Harrison	Gus	Petition	Unknown	9-334
Harrison	Joseph G.	Petition	Unknown	9-334
Harrison	Kenyetta	Postcard	Unknown	7-32, 7-27, 7-27
Harrison	Kenyette	Petition	Unknown	9-334
Harrison	Paige	Email	08/10/21	9-291
Harrison	So'Unique	Postcard	Unknown	7-89, 7-6, 7-149
Hart	John	Email	08/10/21	9-291
Hart	Ryan	Email	10/13/21	9-291
Hartenstein	Ann	Email	08/19/21	9-291
Hart-Gorman	Heidi	Petition	Unknown	9-334
Hart-Gorman	Heidi	Online Form	10/14/21	4-1
Harvey	Dorris	Petition	Unknown	9-334
Harvey	Janice	Petition	Unknown	9-334
Harvey	Palmer	Postcard	Unknown	7-6, 7-142, 7-131
Harvey	Paul	Petition	Unknown	9-334
Harwell	Sarah C.	Petition	Unknown	9-334
Hasan	Terry	Email	08/10/21	9-291
Haskell	James	Online Form	10/14/21	4-1
Haskins	Jessica	Online Form	07/17/21	2-1
Hasley	Sharon	Petition	Unknown	9-334
Hassan	Hamadi	Postcard	Unknown	7-32, 7-27, 7-27, 7-32, 7-138
Hassan	Kirevu	Petition	Unknown	9-334
Hassman	Julie	Email	08/10/21	9-291
Haswell	Katherine	Email	09/14/21	9-291
Hatch	Peter	Email	10/13/21	9-291
Hatcher	Willa	Postcard	Unknown	7-6
Haugsjaa	Ashley	Email	08/19/21	9-291
Hausman	Tami	Email	10/13/21	9-291
Hav	K.	Online Form	07/20/21	3-1
Havell	Tanya	Email	08/10/21	9-291
Havens	K.	Online Form	10/11/21	5-10
Hawes	Kira	Online Form	10/14/21	4-1
Hayes	Felicia	Postcard	Unknown	7-131, 7-129, 7-129

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Hayes	Pauline	Petition	Unknown	9-334
Hayes	Romland	Petition	Unknown	9-334
Hayes	Sidney	Petition	Unknown	9-334
Haynes	Cory	Online Form	10/13/21	3-1
Haynes	Dardrequez	Postcard	Unknown	7-133
Haynes	Yolanda	Postcard	Unknown	7-148, 7-141, 4-54, 7-84
Haynes	Yolanda	Postcard	Unknown	7-4, 7-131, 7-129
Hays	Mary	Email	08/10/21	9-291
Heagerty	Michael John	Email	10/14/21	9-291
Heagerty	Michael John	Postcard	Unknown	7-32, 7-27, 4-54, 7-89
Heagerty	Ryland	Online Form	10/12/21	4-1
Heagerty	Ryland	Email	08/27/21	9-291
Heavenrich	Polly	Postcard	Unknown	7-32, 7-133, 4-54
Hebert	Constance	Petition	Unknown	9-334
Hefferon	Gail	Written Form	09/08/21	8-16, 4-54, 2-5
Heffron	Joshua Konheim	Email	08/10/21	9-291
Hegarty	Elizabeth	Email	08/10/21	9-291
Heifetz	Jeanne	Email	08/19/21	9-291
Heilbroner	Quentin	Email	08/18/21	9-291
Heins	Maurie	Email	09/07/21	9-291
Heller	Mary	Email	08/11/21	9-291
Helmes	Phyllis	Email	08/10/21	9-291
Hemmings	Madeleine	Email	08/10/21	9-291
Hems	Kendra	Email	08/27/21	8-12, 8-1, 7-84, 4-106
Henderson	Emanuel B.	Letter	08/16/21	7-32
Henderson	Josephine	Postcard	Unknown	7-27, 7-27, 7-131
Henderson	Josephine	Postcard	Unknown	7-9, 7-6, 7-142
Henderson	Katisi	Petition	Unknown	9-334
Henderson	Mary	Email	08/07/21	9-291
Henderson	Tyrhonda	Postcard	Unknown	7-84, 7-32, 7-138
Hendrix	Naosha	Petition	Unknown	9-334
Hendson	Sherry	Petition	Unknown	9-334
Hennessey	Laura	Email	08/10/21	9-291
Hennessy	Cat	Postcard	Unknown	9-264, 7-6, 7-149
Hennessy	Liz	Email	08/10/21	9-291
Henry	Luke	Email	10/13/21	9-291
Henry	Patricia	Petition	Unknown	9-334
Henry	Scott	Petition	Unknown	9-334
Henry	Shawn	Postcard	Unknown	7-133
Henry	Terry	Petition	Unknown	9-334
Hepner	Suzanne	Email	08/10/21	9-291
Herb	Christine	Online Form	10/14/21	7-9, 7-133, 4-55
Herman	Benjamin	Email	10/13/21	9-291
Hernandez	Nodesia	Postcard	Unknown	7-4, 7-27, 7-27
Herren	Amy	Email	08/10/21	9-291
Herrick	Samantha	Email	10/13/21	9-291
Herring	Sam	Petition	Unknown	9-334
Herrmann	Anne	Email	10/14/21	9-291
Herskovits	Kathryn	Email	08/10/21	9-291
Hertz	Louise	Email	08/11/21	9-291
Hess	Martha	Email	08/10/21	9-291
Hetland	John	Email	10/13/21	9-291
Heuler	Karen	Email	08/10/21	9-291
Hewitt	Marta	Email	07/18/21	9-291
Hickey	Kevin	Email	08/30/21	9-291
Hicks	Edward	Petition	Unknown	9-334
Hicks	Lara	Postcard	Unknown	7-9, 7-131, 7-131
Hicks	Quentin	Email	08/14/21	9-291
Hidalgo	Beatriz	Postcard	Unknown	7-9, 7-4, 7-142
Hides	Shirley	Postcard	Unknown	7-4, 7-32, 4-104
Higbee	Laura	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Higdon	James	Postcard	Unknown	4-67, 4-46, 4-104
Hightower	Darren	Petition	Unknown	9-334
Hikes	Brenda	Postcard	Unknown	7-131, 7-129, 7-129
Hile	Carol	Email	10/01/21	4-1
Hilf	Lawrence	Email	08/29/21	9-291
Hilfiger	Rebecca	Petition	Unknown	9-334
Hill	Cherie	Postcard	Unknown	7-6, 7-138, 7-133
Hill	Enoch	Petition	Unknown	9-334
Hill	Lekia	Petition	Unknown	9-334
Hill	Lekia K.	Postcard	Unknown	7-4, 7-131, 4-104
Hill	Marissa L.	Petition	Unknown	9-334
Hill	R-----	Petition	Unknown	9-334
Hill	Raheem	Postcard	Unknown	7-129, 7-149
Hill	Sarah	Oral	09/09/21	7-129, 4-55
Hill	Valerie	Postcard	Unknown	7-9, 7-149, 7-141
Hillanbrand	Stacy	Email	10/14/21	4-2
Hills	Gloria	Postcard	Unknown	9-253 through 9-257
Hilterbrandt	Gina	Postcard	Unknown	7-9, 7-32, 4-54
Himmelhoch	Leah	Email	08/10/21	9-291
Hines	Brenda	Petition	Unknown	9-334
Hines	Harry	Petition	Unknown	9-334
Hines	Jaedan	Petition	Unknown	9-334
Hinkle	Leon	Postcard	Unknown	7-9, 7-133
Hinksman	William	Petition	Unknown	9-334
Hinton	Tim	Petition	Unknown	9-334
Hintz	Fred	Petition	Unknown	9-334
Hlinka	Jennifer	Email	08/10/21	9-291
Hobart, et al	Travis	Email	10/14/21	7-89, 7-6, 7-148, 4-60, 4-55, 4-1
Hobbs	Adara	Email	08/04/21	9-291
Hobbs	Adara	Oral	08/17/21	8-3, 8-12, 8-1, 7-21, 4-55
Hobler	Theresa	Petition	Unknown	9-334
Hochstein	Rolaine	Email	08/19/21	9-291
Hodell	Michael	Voicemail	08/31/21	5-10
Hodgens	Mary Lee	Postcard	Unknown	7-141, 7-133, 4-54
Hodgins	Jean	Email	10/13/21	9-291
Hofer	Daniel	Email	08/10/21	9-291
Hoffman	Molly	Online Form	10/12/21	4-1
Hofstetter	Julia	Petition	Unknown	9-334
Hogan	Amanda	Email	10/14/21	9-291
Hogan	Amanda	Petition	Unknown	9-334
Hogi	Joyce King	Email	08/10/21	9-291
Holand	Deanna	Oral	09/09/21	8-3, 7-84
Holden	Steven	Postcard	Unknown	7-21, 7-133
Holden	Willi	Email	10/13/21	9-291
Holiday	Brendan	Petition	Unknown	9-334
Holland	Davell	Postcard	Unknown	7-4, 7-32, 7-27
Holliday	David	Online Form	09/04/21	4-98
Hollinger	Ann	Email	08/10/21	9-291
Hollis	Jessica	Postcard	Unknown	7-133
Hollis Merritt	Susan	Email	10/13/21	9-291
Hollister	Jay	Online Form	09/03/21	5-10
Holloway	Andy	Postcard	Unknown	9-253 through 9-257
Holloway	Robert	Postcard	Unknown	7-4, 7-32, 7-27
Hollywood	Michael	Email	10/13/21	9-291
Holmes	Brandon	Email	10/13/21	9-291
Holmes	Douglas	Petition	Unknown	9-334
Holmes	Hatisha	Online Form	09/21/21	4-1
Holst	Emily	Postcard	Unknown	7-27, 7-27, 7-131
Holst	Kyle	Postcard	Unknown	7-4, 7-27, 7-131
Holtzman	Wendy	Email	08/10/21	9-291
Holzman	Brianna	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Hom	Kayla	Email	08/10/21	9-291
Homer	Ashley	Petition	Unknown	9-334
Honess	Chris	Online Form	10/12/21	4-61, 4-1
Honeywell	Matthew	Petition	Unknown	9-334
Hook	Arnold	Email	10/13/21	9-291
Hoosock	Steve	Petition	Unknown	9-334
Hooven	John	Email	07/17/21	4-99, 4-74
Hoover	James	Email	08/10/21	9-291
Hope	Tanya	Petition	Unknown	9-334
Hopkins	Audrey	Postcard	Unknown	7-84, 4-67, 4-54, 4-55
Hopkins	Steve	Email	10/13/21	9-291
Horan	Ann	Postcard	Unknown	7-133
Horn	Bart	Email	08/19/21	9-291
Horn	Susan	Email	08/10/21	9-291
Horsford	Karissa	Petition	Unknown	9-334
Horst	Terry	Email	09/27/21	5-13, 4-60, 4-1
Horstein	Riley	Postcard	Unknown	7-6, 7-149, 7-148, 7-32
Horton	Keith	Postcard	Unknown	7-133
Horton	Lindsay	Postcard	Unknown	7-9, 8-3, 8-6, 8-8
Horvath	Ed	Online Form	10/13/21	5-20
Horwitz	Carol	Email	08/10/21	9-291
Hosang	Leon	Email	10/13/21	9-291
Houck	Eric	Online Form	10/12/21	4-1
Hourigan	Megan	Email	10/06/21	4-131
House	Thomas	Online Form	10/13/21	7-63, 6-5, 5-10, 4-2
Houston	Juvar	Postcard	Unknown	7-27, 7-129, 4-54
Howard	Becky	Petition	Unknown	9-334
Howard	Candace	Email	08/19/21	9-291
Howard	Katherine	Petition	Unknown	9-334
Howard	Michael	Petition	Unknown	9-334
Howard	Mildred	Petition	Unknown	9-334
Howard	Sarah	Email	08/10/21	9-291
Howard	Tracey C.	Petition	Unknown	9-334
Howe	Jared	Email	10/13/21	9-291
Howe	Michael	Online Form	10/12/21	4-1
Howell	Mark	Petition	Unknown	9-334
Howington	Theresa	Petition	Unknown	9-334
Howland	Nancy	Email	08/11/21	9-291
Howley	Jaime	Petition	Unknown	9-334
Hudgins	Sonia	Petition	Unknown	9-334
Hudson	Louvenia	Petition	Unknown	9-334
Hudson	M---	Petition	Unknown	9-334
Hudson	Monisha	Petition	Unknown	9-334
Hudson	Monisha	Postcard	Unknown	7-133
Hudson	Terisa	Postcard	Unknown	4-56, 7-32, 7-89, 7-95
Hudson, Sr.	Charles L.	Postcard	Unknown	7-84, 7-141, 4-67
Hudson-Hill	Virginia	Postcard	Unknown	7-133
Huegel	Judith	Email	10/08/21	5-10, 4-2
Huelbig	Mackensie	Email	08/10/21	9-291
Hufnagel	Glenn	Email	10/13/21	9-291
Huggins	Carmen	Email	08/10/21	9-291
Hughes	Donald	Postcard	Unknown	7-9, 4-67, 4-107, 7-148
Hughes	Donald	Postcard	Unknown	4-107, 7-148
Hughes	Donald	Oral	09/08/21	4-47, 4-46, 4-1
Hughes	Melissa	Email	08/11/21	9-135, 9-133, 7-52
Hughes	Missy	Letter	07/22/21	8-12, 8-1
Hughes	Robert	Online Form	10/14/21	7-106, 4-28
Humbert	Jane A.	Postcard	Unknown	7-84, 7-32, 4-54
Humbert	Jayne	Email	08/31/21	9-291
Humes	Craig	Email	06/29/21	6-5
Humphreville	Tom	Online Form	07/17/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Humphries-Brooks	Sharon	Email	08/19/21	9-291
Hundley	Gwendolyn	Petition	Unknown	9-334
Hungerford	Rhonda	Petition	Unknown	9-334
Hunt	Diane	Postcard	Unknown	7-6, 7-27
Hunt	Maryland	Petition	Unknown	9-334
Hunter	Amadis	Postcard	Unknown	9-253 through 9-257
Hunter	Amanda	Petition	Unknown	9-334
Hunter	Angela	Petition	Unknown	9-334
Hunter	Davon	Postcard	Unknown	7-133
Hunter	JC	Email	08/10/21	9-291
Hunter-Cotton	Minnie	Petition	Unknown	9-334
Huq	Rehana	Email	08/10/21	9-291
Hurd	Mikelia	Petition	Unknown	9-334
Hurdin	James	Oral	09/01/21	3-1
Hurley	Martha	Email	08/10/21	9-291
Hurst	Jackson	Oral	08/17/21	5-10, 4-1
Hurstwahl	Jill	Oral	09/01/21	4-1
Hurst-Wahl	Jill	Postcard	Unknown	7-27, 7-133, 7-131, 4-1
Hussein	Omar	Postcard	Unknown	7-9, 7-27, 7-142
Husted	Amanda	Postcard	Unknown	7-9, 7-27, 7-142
Hydara	Elizeh	Postcard	Unknown	7-9, 7-131, 4-104
Hyde	Anastasia	Postcard	Unknown	9-264, 7-27, 7-138
Hyde	Paulette	Postcard	Unknown	7-6, 7-27, 7-149
Hydleberg	Steven M.	Petition	Unknown	9-334
Hynes	Pattie	Postcard	Unknown	7-32, 7-27, 7-142
Hyze	Anna	Postcard	Unknown	7-4, 7-27, 7-131
I-----	Elgin	Petition	Unknown	9-334
Icbedell	Patricia	Postcard	Unknown	9-253 through 9-257
Ihrke	Hanna	Email	08/10/21	9-291
Iliev	Gina	Postcard	Unknown	7-9, 7-32, 7-27, 4-1
Imboden, MD	Linda	Email	10/04/21	4-94, 4-71, 4-55, 4-53, 4-124, 4-107, 4-1
Infranco	Sophia	Email	08/11/21	9-291
Ingram	Helen	Petition	Unknown	9-334
Ingram	Hurty	Postcard	Unknown	7-9, 7-142, 7-129
Ingram	Louise	Petition	Unknown	9-334
Ingram	Louise	Petition	Unknown	9-334
Inman	C B	Online Form	10/14/21	4-1
Inserra	Marie	Email	10/13/21	9-291
International Warehouse Logistics Association	Steve	Letter	08/26/21	8-12, 8-1
Intrator-Diehl	Nina	Email	08/10/21	9-291
Iodice	Laura	Petition	Unknown	9-334
Iqbal	Emily	Email	08/10/21	9-291
Irish	Matt	Postcard	Unknown	4-67, 4-46, 4-104
Irish	Michael J.	Petition	Unknown	9-334
Irwin	Mike	Postcard	Unknown	7-133
Isaac	Adiasia	Petition	Unknown	9-334
Islam	Ethelean	Petition	Unknown	9-334
Isler	Afam	Email	10/13/21	9-291
Isserlis	Alan	Online Form	10/12/21	5-17
Itskovich	Anka	Email	08/10/21	9-291
Iuviene	Barbara	Email	08/10/21	9-291
Ivey	Andrea	Email	08/19/21	9-291
Ivisan	Jenn	Postcard	Unknown	7-27, 7-27, 7-142
Ivison	Creg	Online Form	07/20/21	3-1
J----	Timothy	Petition	Unknown	9-334
J---- - Bey	Najah Salaa	Petition	Unknown	9-334
J.	Hakeem	Petition	Unknown	9-334
J.	M.	Written Form	09/09/21	7-4
Jackson	Anthony	Petition	Unknown	9-334
Jackson	Charles	Online Form	10/03/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Jackson	Charles	Postcard	Unknown	7-6, 7-27, 7-138
Jackson	Howard E.	Petition	Unknown	9-334
Jackson	Loretta	Petition	Unknown	9-334
Jackson	Natasha	Petition	Unknown	9-334
Jackson	Nathaniel	Email	10/13/21	9-291
Jackson	Ricky	Postcard	Unknown	7-133
Jackson	Ricky	Postcard	Unknown	7-133
Jackson	Shermane	Petition	Unknown	9-334
Jackson	Shermel	Petition	Unknown	9-334
Jackson, Jr.	Lucinda	Petition	Unknown	9-334
Jackson, Jr.	Roland J.	Petition	Unknown	9-334
Jacobs	Andrea	Email	08/19/21	9-291
Jacobs	Andrea	Postcard	Unknown	7-84, 7-27, 7-131
Jacobs	Andrea	Postcard	Unknown	7-27, 7-131, 4-54
Jacobs	Doreen	Email	08/04/21	9-291
Jacobs	Doreen	Postcard	Unknown	7-133
Jacobs	Jeffrey	Online Form	08/17/21	4-2
Jacobs	Leah Rose	Email	10/13/21	9-291
Jacobs	Luann	Email	08/10/21	9-291
Jacobs	Maarten	Postcard	Unknown	7-131, 7-131, 4-54
Jacobs	Maarten	Postcard	Unknown	7-131, 7-131, 4-55
Jacobs	Megan	Email	08/21/21	9-291
Jacobs	Robert	Email	10/13/21	9-291
Jacobson	Robert	Email	08/10/21	9-291
Jacobson	Samantha	Postcard	Unknown	7-84, 7-148, 7-133
Jacquinot	Mark	Email	10/13/21	9-291
Jacubiak	Emily	Email	10/04/21	4-124
Jagelle	Karen	Online Form	10/12/21	5-10
Jagusah	MoAde	Email	08/04/21	9-291
James	Clementine	Email	08/10/21	9-291
James	David	Online Form	07/18/21	3-1
James	Enid	Petition	Unknown	9-334
James	Eric	Petition	Unknown	9-334
James	Frederick	Postcard	Unknown	7-138, 7-131, 4-54
James	Martha	Email	08/10/21	9-291
James	Terri	Petition	Unknown	9-334
James-Hooper	April	Email	10/13/21	9-291
Jamison	Ann	Email	08/10/21	9-291
Jamison	Ann	Postcard	Unknown	7-6, 7-27, 7-148
Jamison	Ann	Postcard	Unknown	7-89, 7-131, 4-54, 7-138, 5-13
Jamison	Annicia	Email	08/11/21	9-135, 9-133, 7-52
Jamison	Kate	Email	08/11/21	9-291
Jandrew	Kayla	Postcard	Unknown	7-9, 7-32
Jannison	Ann	Petition	Unknown	9-334
Januseski	Stephen	Email	08/05/21	9-291
Janvier	Nicolas	Petition	Unknown	9-334
Jarvis	Astrid	Email	08/19/21	9-291
Javois-White	Evone	Email	08/10/21	9-291
Jean-Francois	Kirstie	Email	10/12/21	9-291
Jean-Louis	Jerry	Postcard	Unknown	7-32, 7-149, 7-131
Jefferson	Lonnie	Written Form	09/09/21	7-4
Jefferson	Sandra	Petition	Unknown	9-334
Jefferson	Sandy	Petition	Unknown	9-334
Jefferson	G.C.	Online Form	07/18/21	4-1
Jemmott	Andre	Petition	Unknown	9-334
Jena	Alice	Email	10/13/21	9-291
Jeng	Lillian	Petition	Unknown	9-334
Jenkins	Desirée	Postcard	Unknown	7-89, 7-27, 6-3
Jenkins	Lucas	Postcard	Unknown	7-141, 7-133, 4-67
Jenkins	Mary	Email	10/13/21	9-291
Jenkins	Queshaun	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Jennings	Christi	Online Form	10/12/21	4-61, 4-1
Jennings	Jasmine	Postcard	Unknown	7-1
Jennings	Ronald Otis	Petition	Unknown	9-334
Jennings	Shawn	Petition	Unknown	9-334
Jennings-Bey	Timothy	Petition	Unknown	9-334
Jeremiah	Safiya	Email	10/13/21	9-291
Jerez	Mildred	Email	08/10/21	9-291
Jeylani	Abdulkadir	Postcard	Unknown	7-27, 7-142, 7-131
Jimenez	Alisa	Email	08/10/21	9-291
Jimenez, Jr.	Wilfredo	Petition	Unknown	9-334
Jobes	Liam	Online Form	08/02/21	4-135
Jodlay	Mr.	Oral	08/18/21	6-2
Joerss	Detlef	Email	08/10/21	9-291
Joevon	Loories	Postcard	Unknown	7-27, 7-27, 7-142
Johansson	Anne	Email	08/10/21	9-291
Johns	Ben	Online Form	10/12/21	4-1
Johnson	Allen W.	Petition	Unknown	9-334
Johnson	Ashley	Email	08/19/21	9-291
Johnson	Barbara	Email	08/10/21	9-291
Johnson	Barbara	Postcard	Unknown	4-67, 4-46, 4-104
Johnson	Candice	Postcard	Unknown	7-133
Johnson	Catherine	Petition	Unknown	9-334
Johnson	Charles	Email	08/10/21	9-291
Johnson	Charlie	Online Form	09/14/21	3-1
Johnson	Christina N.	Postcard	Unknown	7-89, 7-84, 7-27, 7-148, 4-54
Johnson	Crista	Email	08/10/21	9-291
Johnson	Darrell	Petition	Unknown	9-334
Johnson	David	Email	08/10/21	9-291
Johnson	Dina	Petition	Unknown	9-334
Johnson	Doris W.	Petition	Unknown	9-334
Johnson	Geraldine	Postcard	Unknown	7-131
Johnson	Geraldine	Postcard	Unknown	7-148, 7-138, 7-131
Johnson	James	Email	08/10/21	9-291
Johnson	Jamie	Petition	Unknown	9-334
Johnson	Joshua	Petition	Unknown	9-334
Johnson	Juanita	Postcard	Unknown	7-84, 7-148, 7-133
Johnson	Kay	Email	08/17/21	9-291
Johnson	Kayla	Email	08/04/21	9-291
Johnson	Kayla	Oral	09/09/21	7-134, 7-133
Johnson	Kayla	Postcard	Unknown	7-84, 7-141, 7-133, 7-89
Johnson	Kayla	Postcard	Unknown	7-27, 7-89
Johnson	Keiondra	Petition	Unknown	9-334
Johnson	Keith	Email	09/26/21	3-1
Johnson	Kenneth	Online Form	10/14/21	7-62
Johnson	Lance	Postcard	Unknown	7-32, 7-148, 7-141, 7-84
Johnson	Lonnie	Postcard	Unknown	7-131, 7-131, 7-129
Johnson	Maria	Petition	Unknown	9-334
Johnson	Marshall	Petition	Unknown	9-334
Johnson	Marvin	Petition	Unknown	9-334
Johnson	Marvin	Petition	Unknown	9-334
Johnson	Matt	Postcard	Unknown	7-129, 4-54, 4-46
Johnson	Matt	Postcard	Unknown	7-27, 7-27, 7-148
Johnson	Matthew	Postcard	Unknown	7-129
Johnson	Michele	Email	10/13/21	9-291
Johnson	Natasha	Postcard	Unknown	7-148, 7-133, 4-67
Johnson	Nicole	Email	10/13/21	9-291
Johnson	Renee	Online Form	08/18/21	6-1
Johnson	Rosetta	Petition	Unknown	9-334
Johnson	Samuel	Postcard	Unknown	7-89, 7-32, 7-133
Johnson	Samuel	Online Form	09/03/21	4-70, 4-61, 4-47, 4-1
Johnson	Sarah	Email	08/16/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Johnson	Sarah	Petition	Unknown	9-334
Johnson	Susan A.	Email	08/11/21	9-291
Johnson	Tahill	Postcard	Unknown	7-133
Johnson	Tameka	Postcard	Unknown	7-6, 7-4, 7-129
Johnson	Tyrema	Postcard	Unknown	7-89, 7-32, 7-141, 7-9, 7-89
Johnson	Vanessa	Petition	Unknown	9-334
Johnson	Willie L.	Postcard	Unknown	7-84, 7-131, 4-67
Johnson	Za'Von	Postcard	Unknown	7-133
Johnston	Caitlin	Online Form	10/14/21	4-1
Johnston	Emma L.	Petition	Unknown	9-334
Joiner	Charlie	Email	10/13/21	9-291
Joint	Michael	Petition	Unknown	9-334
Jones	Robb	Petition	Unknown	9-334
Jones	Antwan	Postcard	Unknown	7-9, 7-27, 7-131
Jones	Belinda	Petition	Unknown	9-334
Jones	Beverly	Postcard	Unknown	7-27, 7-129
Jones	Brenda	Petition	Unknown	9-334
Jones	Cassandra	Petition	Unknown	9-334
Jones	Catherine	Email	08/10/21	9-291
Jones	Chris	Online Form	08/10/21	4-2
Jones	Darnell	Petition	Unknown	9-334
Jones	Dashaun	Postcard	Unknown	7-4, 7-27, 7-142
Jones	Debra	Postcard	Unknown	7-84, 7-148, 7-133
Jones	Dennis	Postcard	Unknown	7-133
Jones	Derek	Petition	Unknown	9-334
Jones	Ernest	Petition	Unknown	9-334
Jones	Ernestine	Petition	Unknown	9-334
Jones	Frederick	Postcard	Unknown	7-32, 7-27, 7-142
Jones	George M.	Petition	Unknown	9-334
Jones	Gwendolyn	Petition	Unknown	9-334
Jones	Indaria	Petition	Unknown	9-334
Jones	Indaria	Postcard	Unknown	7-6, 7-32, 7-133
Jones	Irene	Petition	Unknown	9-334
Jones	Jackeese	Postcard	Unknown	7-4, 7-32, 7-142
Jones	James	Email	10/13/21	9-291
Jones	Kat	Postcard	Unknown	7-32, 7-27, 7-129
Jones	Lillian	Petition	Unknown	9-334
Jones	Lloyd	Email	08/11/21	9-291
Jones	M.	Postcard	Unknown	7-32, 7-142, 7-129
Jones	Marion	Petition	Unknown	9-334
Jones	Mechelle	Petition	Unknown	9-334
Jones	Meghan	Email	08/11/21	9-291
Jones	Mercedes	Petition	Unknown	9-334
Jones	Mitch	Petition	Unknown	9-334
Jones	Nathaniel	Petition	Unknown	9-334
Jones	Patrona	Oral	08/18/21	7-23
Jones	Patrona	Petition	Unknown	9-334
Jones	Percy	Petition	Unknown	9-334
Jones	Ronnie	Petition	Unknown	9-334
Jones	Sonya	Voicemail	10/14/21	3-1
Jones	Talina	Postcard	Unknown	7-4, 7-32, 7-142, 7-6, 7-133, 8-6
Jones	Tanina	Petition	Unknown	9-334
Jones	Thomas	Postcard	Unknown	7-141, 7-133, 4-67
Jones	Thurston	Postcard	Unknown	9-264, 7-131, 6-3
Jones	Tina	Postcard	Unknown	7-4, 7-131, 7-129
Jones	Verna	Postcard	Unknown	6-1
Jones	Willie James	Postcard	Unknown	7-148, 7-133, 7-131
Jones	Willithia	Petition	Unknown	9-334
Jones	Verna	Postcard	Unknown	4-2
Jones Handford	Nancy	Petition	Unknown	9-334
Jones Ingram	Cassandra	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Jones-Clarke	Nazere	Petition	Unknown	9-334
Jones-Handford	Nancy	Postcard	Unknown	7-9, 7-129
Jones-Rowser	Patrona	Postcard	Unknown	7-84, 4-67, 4-54
Jontre	Manny	Postcard	Unknown	7-27, 7-27, 7-142
Jordan	Amoine S.	Written Form	09/09/21	7-9, 7-77, 7-76, 7-21, 4-80
Jordan	Ashley	Petition	Unknown	9-334
Jordan	Cimone S.	Postcard	Unknown	7-27, 7-133
Jordan	David & Terri	Petition	Unknown	9-334
Jordan	Donald	Oral	09/09/21	4-108, 4-1
Jordan	Francine	Petition	Unknown	9-334
Jordan	Valerie	Email	10/13/21	9-291
Jordan	Don	Online Form	08/17/21	4-1
Joshua	Aaron	Petition	Unknown	9-334
Joyce	Strazzabosco	Email	08/10/21	9-291
Judge	Mario	Petition	Unknown	9-334
Judge	Sherman	Postcard	Unknown	7-149, 7-141, 4-54
Judge	Sherry	Petition	Unknown	9-334
Junious	Rachael	Petition	Unknown	9-334
Juodisius	Elena	Postcard	Unknown	7-9, 7-32, 7-129
Jurison	Alan	Letter	10/14/21	7-108, 6-62, 5-10, 4-85, 4-3, 4-2, 3-1
Justian	Virginia	Petition	Unknown	9-334
K.	Sarah	Written Form	09/09/21	7-4
Kadar	Ami	Petition	Unknown	9-334
Kadar	Ami	Postcard	Unknown	7-142, 7-141, 7-131
Kader	Zach	Email	10/13/21	9-291
Kadish	I. Michael	Email	10/13/21	9-291
Kaelin	Corinne	Email	08/10/21	9-291
Kahkejian	Deborah	Email	08/10/21	9-291
Kaigier-Hall	Anelle	Petition	Unknown	9-334
Kaimal	Lorraine	Email	08/10/21	9-291
Kaiser	Susan	Email	08/10/21	9-291
Kalberg	Alex	Postcard	Unknown	7-27, 7-27, 7-131
Kalisch	Cathryn	Email	08/10/21	9-291
Kalish	Randy	Petition	Unknown	9-334
Kaljeskie	Gary	Email	08/11/21	9-135, 9-133, 7-52
Kallander	Amy	Email	10/13/21	9-291
Kallstrom	Scott	Email	08/11/21	9-291
Kamell	E.	Postcard	Unknown	7-84, 4-67, 4-54, 7-27, 7-129
Kamell	Elizabeth	Email	09/21/21	9-291
Kamerance	Barbara	Email	06/21/21	9-291
Kamerance	Barbara	Online Form	08/03/21	4-1
Kanaley	Tim	Online Form	08/03/21	4-47
Kanda	Kevin	Email	08/03/21	9-291
Kanyela	Regina	Petition	Unknown	9-334
Kap	P	Email	08/10/21	9-291
Kaplan	Leslie	Email	08/12/21	9-291
Kaplan	Michele	Email	08/11/21	9-291
Kappler	Susan	Email	08/09/21	9-291
Karan	Josh	Email	08/10/21	9-291
Karbiner	Susan	Email	08/11/21	9-291
Karlik	Bailey	Postcard	Unknown	7-4, 7-32, 7-131
Karnell	Liz	Letter	08/18/21	7-32, 7-133
Karsif	Jessie	Email	08/10/21	9-291
Kasday	Natalie	Email	10/13/21	9-291
Kaselle	Marion	Email	08/10/21	9-291
Kaste	Carly	Online Form	10/12/21	4-1
Katz	Robert	Postcard	Unknown	7-84, 7-148, 7-138
Katz	Shelli	Email	08/10/21	9-291
Katzman	Mindy	Email	08/10/21	9-291
Kaufman	Marianna	Online Form	08/13/21	8-2, 7-133, 7-133, 4-55, 4-49, 4-4, 4-1
Kaufman	Marianna	Postcard	Unknown	9-264, 7-149, 7-131

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Kavanaugh	John	Email	08/10/21	9-291
Kavee	Robert	Email	08/11/21	9-291
Kaxi		Postcard	Unknown	7-32, 7-27, 7-27
Kay	Dawn	Postcard	Unknown	7-32, 7-27, 7-131
Kay	Gwen	Online Form	09/13/21	4-1
Kay	Michael	Email	08/10/21	9-291
Kazario	Eduardo	Petition	Unknown	9-334
Keane	Karen	Postcard	Unknown	7-148, 7-141, 7-138
Keane	Thomas	Email	08/10/21	9-291
Kearen	Chase	Petition	Unknown	9-334
Kearney	Christine	Written Form	08/18/21	7-113
Kearney	Kathleen	Postcard	Unknown	7-4, 7-131, 7-9
Kearse	Sherman	Postcard	Unknown	7-32
Kearse	Veronica	Petition	Unknown	9-334
Keast	Alix	Email	08/19/21	9-291
Keaton	Ocesa	Postcard	Unknown	7-32, 7-6, 7-129
Keause	Anthony	Petition	Unknown	9-334
Keause	Francine	Petition	Unknown	9-334
Keause	Georgette	Petition	Unknown	9-334
Keck	Thomas	Online Form	10/12/21	4-1
Keck	Tom	Postcard	Unknown	7-27, 7-133, 7-131
Keck	Tom	Postcard	Unknown	7-131, 4-54, 4-104, 7-129
Keefer	Al	Email	07/16/21	5-17
Keeling	Andrea	Online Form	07/19/21	4-1
Keene	Tyshawn	Postcard	Unknown	7-133
Keeter	Susan	Postcard	Unknown	7-89, 7-131, 4-67
Keiechian	Kayia	Petition	Unknown	9-334
Kelechian	Kayla	Email	07/19/21	9-291
Kelechian	Kayla	Email	07/19/21	9-291, 4-55
Kelechian	Kayla	Petition	Unknown	9-334
Kelechian	Kayla	Postcard	Unknown	7-32, 7-27, 4-104, 8-6, 8-8
Keller	Chuck	Postcard	Unknown	9-264, 7-27, 7-129
Kelley	Carrie	Online Form	07/20/21	4-2
Kelley	Dava	Petition	Unknown	9-334
Kelley	Lyn	Email	10/13/21	9-291
Kelley	Marie	Postcard	Unknown	7-4, 7-32, 7-142
Kelley	Mary	Postcard	Unknown	7-84, 7-32, 7-133
Kelley	Ondalee	Petition	Unknown	9-334
Kelley	Regina	Postcard	Unknown	7-6, 7-32, 7-142
Kelley	Sheila	Email	08/10/21	9-291
Kellner	Gabrielle	Email	10/13/21	9-291
Kelly	Ashlynn	Postcard	Unknown	9-264, 7-27, 7-138
Kelly	Barbara	Email	10/14/21	9-291
Kelly	Bre	Online Form	08/24/21	9-291
Kelly	Dan	Online Form	10/08/21	4-2
Kelly	Daniel	Online Form	09/03/21	6-5
Kelly	Elizabeth	Email	08/10/21	9-291
Kelly	Jackie	Postcard	Unknown	7-148, 7-138, 7-131
Kelly	Jerry	Online Form	09/01/21	2-1
Kelly	Kathryn	Email	08/03/21	9-291
Kelly	Lauren	Postcard	Unknown	4-55, 7-9, 7-32, 7-89
Kelly	Theresa	Email	10/13/21	9-291
Kemp	Sequoia	Postcard	Unknown	7-89, 7-32, 7-141
Kemper	Matt J.	Letter	09/14/21	5-10
Kendall	Jane	Email	08/10/21	9-291
Kendy	Arthur	Email	10/13/21	9-291
Kennard	Lee	Online Form	08/27/21	4-70, 4-61, 4-1
Kenne	Christopher	Email	08/10/21	9-291
Kennedy	Kerry	Postcard	Unknown	7-84, 4-67, 4-54
Kennedy	Rosanna	Online Form	08/24/21	9-291
Kennedy	William	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Kenyon	Jan	Email	08/11/21	9-291
Keona Moscardon	Reeze	Email	08/10/21	9-291
Kesel	Brian	Online Form	08/02/21	4-1
Keskin	Justin	Online Form	08/06/21	4-135
Ketchum	David	Online Form	09/30/21	4-1
Keuer	Clark	Email	10/13/21	9-291
Khan	Abdulwahid	Email	08/10/21	9-291
Khan	Ali	Email	10/15/21	9-291
Kibeela	Basadi	Petition	Unknown	9-334
Kick	Suzanne	Email	08/10/21	9-291
Kieloch	Don	Email	08/31/21	8-18
Kiernan	Carley	Email	10/15/21	9-291
Kiesa	Ed	Online Form	10/10/21	7-143, 6-26, 4-55
Kiklis	Anastasia	Petition	Unknown	9-334
Kilgore	Sandra	Postcard	Unknown	7-32, 7-27, 7-129
Kilgore-El	Kechua	Petition	Unknown	9-334
Kim	Sun	Email	10/14/21	9-291
Kimatian	Steve	Email	08/27/21	6-1, 4-2
Kimber	June	Postcard	Unknown	9-253 through 9-257
Kimberley	McCoy	Postcard	Unknown	7-141, 7-133, 7-131
Kinane	Ed	Petition	Unknown	9-334
Kinev	Paula	Online Form	09/14/21	7-133, 4-1
King	Alexus	Petition	Unknown	9-334
King	John	Petition	Unknown	9-334
King	John	Postcard	Unknown	7-133
King	Larry	Postcard	Unknown	7-133
King	Maren & John	Letter	10/13/21	6-81, 6-79, 6-77, 4-122, 4-118
King	Martha	Email	08/10/21	9-291
King	Peter	Email	09/08/21	4-1
King	Peter	Letter	10/14/21	9-302 through 9-314, 7-90, 7-90, 7-89, 7-6, 7-148, 4-70, 4-46, 4-131, 4-125, 4-104
King	Peter	Petition	Unknown	9-334
King	Peter	Oral	08/17/21	7-84, 7-21, 7-147, 7-129, 4-71, 4-55, 4-4, 4-1
King	Yolanda	Postcard	Unknown	7-133
King, Maren & Mary Martin		Letter	10/14/21	6-83, 4-71, 4-69, 4-46, 4-129, 4-127, 4-125, 4-113, 4-1
Kinney	Douglas	Email	10/13/21	9-291
Kinney	Trina	Online Form	08/11/21	3-1
Kinsella	Tom	Email	09/28/21	4-13
Kinsey	Emery	Postcard	Unknown	7-6, 7-149, 7-133
Kinsey	Evelyn	Petition	Unknown	9-334
Kinsley	Jack	Email	08/10/21	9-291
Kinslow	Kathleen	Oral	08/17/21	4-47
Kinsman	Devon	Oral	08/17/21	6-92, 6-91
Kipchak	Ismet	Email	08/10/21	9-291
Kipp	Cordelia	Email	08/10/21	9-291
Kirk	George	Email	10/11/21	4-2
Kirk	Philip R.	Oral	09/23/21	2-1
Kirk	Timothy	Email	08/10/21	9-291
Kirkland	Timothy	Petition	Unknown	9-334
Kirkman	Tania	Email	08/10/21	9-291
Kirschner	Diane	Email	08/10/21	9-291
Kirst	Liam	Postcard	Unknown	7-32, 7-131, 4-54, 4-1
Kirst	Seamus	Postcard	Unknown	7-4, 7-27, 7-131
Kissane	Maureen	Written Form	09/23/21	7-105
Kithcart	Shelia	Postcard	Unknown	7-6, 7-133, 4-54
Kittle	Ben	Email	08/10/21	9-291
Klarney	Kathleen	Postcard	Unknown	7-4, 7-131, 7-23
Klass	David	Email	10/13/21	9-291
Klass	Naomi	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Klaver	Claudia	Postcard	Unknown	7-9, 7-4, 7-32, 7-27, 7-142, 7-131
Klaver	Claudia	Postcard	Unknown	4-67, 4-46, 4-104
Klaver	Coran	Email	08/23/21	9-291
Klaver	Coran	Postcard	Unknown	7-32, 7-148, 7-148
Kleiber	Brian	Online Form	08/04/21	4-135
Klein	Florian	Email	08/10/21	9-291
Klein	Ruth	Email	08/11/21	9-291
Klein	Steven	Email	08/10/21	9-291
Kleinberg	Carol	Email	10/13/21	9-291
Klements	Elena	Email	08/10/21	9-291
Klewicki	Cassandra	Email	08/10/21	9-291
Klim	Zach	Petition	Unknown	9-334
Klonowski	Shannon	Email	07/18/21	6-1
Klosterman	Pete	Email	08/10/21	9-291
Kluba	Molly	Email	08/21/21	9-291
Klyber	Joshua	Online Form	10/14/21	4-1
Knapp	John	Email	08/10/21	9-291
Knapp	Pam	Oral	09/13/21	4-39
Knight	Aaron	Online Form	07/21/21	4-1
Knight	Anthony	Petition	Unknown	9-334
Knight	Judith	Email	08/10/21	9-291
Knight	Nancy	Postcard	Unknown	7-6, 7-27, 7-142
Knightly	Sophia	Postcard	Unknown	7-9, 7-89, 7-129
Knightson	Gena	Petition	Unknown	9-334
Knoblock	Peter	Email	08/06/21	4-1
Knusten	Shaun	Email	10/13/21	9-291
Kob	Stephanie	Email	08/10/21	9-291
Koch	Bill	Postcard	Unknown	9-264, 7-148, 7-131, 8-6, 8-8
Koch	Robert	Email	10/13/21	9-291
Koch	W Thomas	Email	10/13/21	9-291
Koelle	Timothy	Email	08/10/21	9-291
Koenig	Janet	Email	08/10/21	9-291
Koff	Stacey	Email	08/11/21	9-291
Kogen	Noam	Email	08/10/21	9-291
Kokkinen	Eila	Email	08/10/21	9-291
Kolassa	Michael	Email	08/10/21	9-291
Kolberg	Alex	Postcard	Unknown	7-27, 7-27, 7-131
Kollar	Sharon	Email	08/10/21	9-291
Kolts	Dean	Email	08/08/21	4-1
Komor	Irene	Email	08/10/21	9-291
Komoroske	Sara	Email	10/13/21	9-291
Komreich	David	Email	08/10/21	9-291
Konishesky	Sarah	Petition	Unknown	9-334
Koniuch	Lauren	Petition	Unknown	9-334
Konys	Caren	Online Form	10/12/21	4-1
Kopp	Johanna	Email	08/12/21	9-291
Koppel	Mark	Email	10/13/21	9-291
Kornbluth	Richard	Petition	Unknown	9-334
Kornbluth	Richard	Petition	Unknown	9-334
Kornbluth	Richard	Postcard	Unknown	7-21, 7-133
Kosack	Susan	Email	10/13/21	9-291
Koshy	Roy	Email	08/11/21	9-291
Kosoff	Allen	Written Form	08/18/21	7-82
Koste	Sara	Postcard	Unknown	7-32, 7-27, 7-142, 7-21
Koster	Fred	Email	08/10/21	9-291
Kotchmar	James	Email	10/13/21	9-291
Kotlarz	Robert	Online Form	08/19/21	5-10
Kotzin	Sara	Email	08/12/21	9-291
Koulish	Laura	Email	10/13/21	9-291
Kovalewski	Mark	Online Form	07/20/21	6-1
Kowalski	Gregory	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Kozlik	James	Email	08/10/21	9-291
Kramer	Rae	Petition	Unknown	9-334
Krauss	Dan	Email	08/10/21	9-291
Kreiss	Daniel	Email	08/11/21	9-291
Kremnitzer	Ben	Email	08/19/21	9-291
Kribs	Jane	Email	08/11/21	9-291
Krichbaum	Grace	Petition	Unknown	9-334
Krick	Jordan	Petition	Unknown	9-334
Kriesel	Katelyn M.	Petition	Unknown	9-334
Krimsky	Pam	Email	10/13/21	9-291
Krockel	Patty	Email	10/13/21	9-291
Kroeger	Steven	Email	09/04/21	9-291
Krohl	Kelly	Online Form	09/01/21	4-1
Krueger	Karin	Email	08/10/21	9-291
Kruse	Brandon	Online Form	10/12/21	4-1
Krusey	Katie	Petition	Unknown	9-334
Krusey	Katie	Petition	Unknown	9-334
Kucera	Kamrin	Online Form	10/14/21	2-1
Kuhl	James W.	Petition	Unknown	9-334
Kuhn	Mary	Postcard	Unknown	7-84, 4-67, 4-54, 4-71
Kuhn	Mary	Postcard	Unknown	7-131, 7-129, 4-54, 4-1
Kulmiya	Khadija	Postcard	Unknown	7-89, 7-27, 6-3
Kunhardt	Arthur	Email	08/19/21	9-291
Kunzelmann	Pete	Email	10/08/21	4-2
Kuppermann	Ellison	Online Form	09/22/21	5-1
Kurra	Cherritha	Petition	Unknown	9-334
Kurzweil	Andrew	Email	10/13/21	9-291
Kuss	Raymond	Oral	09/13/21	7-135
Kuss	Raymond	Written Form	08/18/21	7-135
Kutz	Ruth C.	Petition	Unknown	9-334
Kwasniewski	Patricia	Online Form	10/14/21	4-1
Kwiatowski	Leo J	Email	10/13/21	9-291
Kwik	Sharon	Email	08/10/21	9-291
Kyle	Harold	Online Form	10/13/21	4-1
Kyriacou	Nancy	Email	08/10/21	9-291
L.	Kristin	Email	08/10/21	9-291
Laay	Naqwa	Postcard	Unknown	7-84, 4-67, 4-54
Laborde	Claire	Email	08/10/21	9-291
LaBorie	Carol	Email	08/10/21	9-291
Lacey	Naquia	Postcard	Unknown	7-84, 4-67, 4-54
Lacey	Sumita	Email	10/13/21	9-291
Lafaver	Alyssa	Petition	Unknown	9-334
Laferte	Alexa	Email	10/13/21	9-291
LaFrance	M. Diane	Petition	Unknown	9-334
Laguerre	Hernz	Online Form	10/13/21	3-2
Lahiri	Saptarshi	Email	10/14/21	9-291
Laissle	Kate	Online Form	10/13/21	4-1
Lakshmanan	Shaan	Online Form	10/14/21	4-1
Lam	Leon	Postcard	Unknown	7-6, 7-27, 7-131
Lambert	Margaret	Online Form	09/03/21	7-100
Lamirande	Jessica	Email	08/27/21	9-291
Lamson	Piper	Email	08/10/21	9-291
Landfort	Tyrene	Postcard	Unknown	7-133
Landfort	Tyrene	Postcard	Unknown	7-133
Landis	Catherine	Postcard	Unknown	4-141, 7-8, 7-21, 7-27, 7-89
Landisi	Danny	Postcard	Unknown	7-9, 7-32
Landless	Gavin	Postcard	Unknown	7-149, 6-3, 4-67, 8-6, 8-8
Landon	Matthew	Petition	Unknown	9-334
Lane	Aggie	Petition	Unknown	9-334
Lane	Jan	Postcard	Unknown	7-84, 7-27, 7-148, 7-133, 7-131
Lane	Michael	Email	10/16/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Lane	Patrick	Online Form	10/14/21	7-133, 4-1
Lane	Patrick R.	Postcard	Unknown	9-264, 7-84, 7-6, 7-138, 7-133
Lang	Amy	Email	08/19/21	9-291
Lang (Rev. Msgr.)	James P.	Letter	09/27/21	7-52, 4-61, 4-2, 4-15
Lange	Marlena	Email	10/13/21	9-291
Langer	Elizabeth	Email	08/18/21	9-291
Lankford	Precious	Petition	Unknown	9-334
Lankford	Tamika	Petition	Unknown	9-334
Lanning	Maeve	Online Form	08/12/21	4-1
Lapoint	Gary	Oral	09/01/21	4-4
Lapoint	Gary	Oral	09/01/21	4-54
Larkin	Caitlyn	Online Form	07/18/21	4-1
Larode	Ashley	Petition	Unknown	9-334
Larsen	T.	Postcard	Unknown	7-89, 7-129, 7-142
Larson	Eric	Email	08/10/21	9-291
Larson	Vivian	Postcard	Unknown	7-9, 7-32, 7-131
Lashay	Glenn	Postcard	Unknown	7-6, 7-4, 7-27
Lasko	Judith	Email	08/10/21	9-291
Lasonde	J.	Postcard	Unknown	7-27, 7-27, 7-142, 7-21, 7-32
Lasonde	Jacqueline	Email	08/08/21	9-291
Lasonde	Jacqueline	Oral	08/17/21	8-3, 8-2, 8-12, 8-1, 7-84, 7-133, 4-57, 4-55
LaSonde	Jacqueline	Written Form	09/09/21	4-55
Last	Athena	Online Form	09/18/21	7-133
Lathavong	Tommy	Postcard	Unknown	7-133
Latner	Ornicka	Petition	Unknown	9-334
Laub	Andrew	Email	08/19/21	9-291
Laurence	K.	Email	08/10/21	9-291
Lavalette	Shane	Postcard	Unknown	7-89, 7-27, 7-133
Lavonder	KeDarriel	Petition	Unknown	9-334
Law	Tom	Oral	08/18/21	7-139
Law	Tom	Petition	Unknown	9-334
Lawlor	Liam	Petition	Unknown	9-334
Lawrence	Aaron L.	Petition	Unknown	9-334
Lawrence	George	Oral	08/18/21	4-2
Lawrence	George C.	Postcard	Unknown	7-32, 7-149, 7-148
Lawrence	George C.	Written Form	08/18/21	5-15
Lawrence	Leslie	Postcard	Unknown	7-9, 7-27, 7-133
Lawrence	Leslie	Postcard	Unknown	7-133
Lawrence	Miriam	Email	10/13/21	9-291
Lawrence	Patricia	Email	08/10/21	9-291
Lawrence	Rita A.	Petition	Unknown	9-334
Lawrence	Rita A.	Postcard	Unknown	7-133
Lawrence-Brown	Diana	Email	10/13/21	9-291
Lawson	Alex	Online Form	10/14/21	4-71
Lawson	Janet	Postcard	Unknown	7-89, 7-148, 7-133
Lawson	Joseph	Email	10/13/21	9-291
Lawson	Martha	Postcard	Unknown	7-27, 7-142, 7-131
Lawson	Martha	Written Form	09/01/21	4-1
Lawson	Willie	Petition	Unknown	9-334
Lazard		Postcard	Unknown	7-6, 7-129, 4-54, 7-138
LeBlanc	Kelly	Online Form	08/18/21	3-1
Leblang	Adrienne	Oral	08/26/21	4-55
Leblang	Adrienne	Voicemail	08/14/21	6-39
Leblond	Alexander	Email	08/10/21	9-291
Lebrecht	Jennifer	Postcard	Unknown	7-32, 6-3, 4-104
Lee	Winston	Petition	Unknown	9-334
Lee	Arianna	Petition	Unknown	9-334
Lee	Diana	Email	08/10/21	9-291
Lee	Megan	Email	08/05/21	9-291
Lee	Megan	Oral	08/17/21	8-12, 8-1, 4-1
Lee	Monisha	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Lee	Robert	Email	08/10/21	9-291
Lee	Tsee	Email	10/13/21	9-291
Leeb	Kurt	Email	10/13/21	9-291
Leece	Chris	Email	08/27/21	9-291
Lefler	Angela	Online Form	10/14/21	4-47, 4-1
Lefler	Angela	Postcard	Unknown	9-264, 7-89, 4-54
LeGacy	Maria	Online Form	10/14/21	4-1
Legaroff	Kyra	Email	08/11/21	9-291
Leggat	Graham	Email	08/06/21	9-291
Lehrer	Ernest	Email	08/10/21	9-291
Leibowitz	Rachel	Email	10/11/21	7-71, 4-55, 4-47
Leich	Elizabeth	Email	09/03/21	7-97
Leich	Elizabeth	Letter	09/09/21	7-97
Leich	Kimberly	Postcard	Unknown	9-264, 7-141, 6-3
Leimanis	Andra	Email	10/14/21	9-291
Leite-Cortes	Marcella	Email	08/10/21	9-291
Lemieux	Eleanor	Petition	Unknown	9-334
Lemon	Luisa	Postcard	Unknown	7-141, 7-131, 7-129
Lemondes	John	Email	10/13/21	5-10
Lent	Daniel	Online Form	10/14/21	4-1
Lentz	Barry	Letter	01/00/00	8-11, 7-133, 4-71, 4-61, 4-4, 4-1
Lentz	Barry	Letter	01/00/00	7-9
Lentz	Eleanor	Online Form	10/13/21	4-1
Lentz	Eleanor	Postcard	Unknown	7-32, 7-27, 7-27, 7-21
Leonard	Brianna	Postcard	Unknown	7-32, 7-142, 7-131
Leonard	Christine	Postcard	Unknown	7-32, 7-131
Leonard	Victoria	Petition	Unknown	9-334
Leone	Claire	Email	10/13/21	9-291
Leone	Mike	Petition	Unknown	9-334
Leone	Mike	Online Form	10/13/21	7-35
Leone	Mike	Online Form	07/26/21	7-35
Leopold	Tatania	Email	10/14/21	9-291
Lerman	Stephen	Online Form	10/09/21	6-11
Lerner	Judith	Email	08/10/21	9-291
Lester	Mary	Email	08/10/21	9-291
Letendre	Haleigh	Postcard	Unknown	7-1, 7-129
Leung	Anna	Email	08/05/21	9-291
Leuschke	Graham	Online Form	10/14/21	4-1
Levens	Dane	Email	08/10/21	9-291
Levens	Darren	Email	10/13/21	9-291
Levine	Rhoda	Email	08/10/21	9-291
Levy	Susan	Email	08/10/21	9-291
Lewis	Augusten	Petition	Unknown	9-334
Lewis	B.	Email	08/10/21	9-291
Lewis	Cindy	Postcard	Unknown	7-89, 7-32, 7-141
Lewis	Clarissa	Petition	Unknown	9-334
Lewis	Ethan	Petition	Unknown	9-334
Lewis	Greg	Email	10/06/21	9-291
Lewis	Greg	Petition	Unknown	9-334
Lewis	James & Joanne	Voicemail	10/04/21	4-2, 4-140
Lewis	Keenan	Petition	Unknown	9-334
Lewis	Minchin	Letter	10/14/21	5-12, 5-11, 5-10, 4-2
Lewis	Minchin	Oral	08/17/21	8-12, 8-1
Lewis	Sheyanna	Petition	Unknown	9-334
Lewis	Susan	Email	10/13/21	9-291
Lewis	Sylvia	Written Form	08/18/21	7-119
Lewis	Victoria	Online Form	09/14/21	5-10
Ley	Christopher	Email	10/13/21	9-291
Li	Emily	Postcard	Unknown	7-89, 7-138, 7-142
Lieblein	Judy	Petition	Unknown	9-334
Lilly	Marva	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Lilly	Stephanie	Online Form	10/13/21	4-1
Lin	Jessica	Email	10/13/21	9-291
Lin	Laura	Email	08/10/21	9-291
Lincoln	Paul	Email	10/13/21	9-291
Lindberg	James	Postcard	Unknown	9-264, 7-27, 7-141
Lindroth	Layne	Petition	Unknown	9-334
Lindsley	Richard	Letter	08/27/21	7-49
Linehan	Patrick	Petition	Unknown	9-334
Linehan	Patrick	Petition	Unknown	9-334
Linen	Sherry	Email	10/12/21	9-291
Lippman	Donna Robin	Email	08/10/21	9-291
Liquori	Mitchell	Email	10/06/21	4-94
Lischak	Maria	Petition	Unknown	9-334
Lish	Elizabeth	Voicemail	09/07/21	7-97
Liss	Cynthia	Email	08/10/21	9-291
Litten	Edna	Email	10/13/21	9-291
Little	Corey	Email	08/10/21	9-291
Little	Khyah	Petition	Unknown	9-334
Little	Petra	Petition	Unknown	9-334
Little	Roderick	Petition	Unknown	9-334
Littlefield	Kate	Email	10/13/21	9-291
Liu	Mark	Email	10/13/21	9-291
Liu	Mini	Email	08/10/21	9-291
Liu	Qingyang	Oral	08/17/21	9-269, 7-129
Liuzzi	Peggy	Email	09/22/21	7-133, 7-129, 4-55, 4-4, 4-2, 4-1
Livingston	Elaine	Email	08/17/21	9-291
Lloyd	Dani	Email	08/10/21	9-291
Lloyd	Tiffany	Postcard	Unknown	7-84, 7-6, 4-104
LoBiondo	Jennifer	Email	10/14/21	9-291
Locke	Nonnie	Email	08/10/21	9-291
Lockhart	Kevin	Letter	09/28/21	7-9, 7-151, 7-138, 7-133, 4-71, 4-61, 4-4, 4-1
Lockwood	Benjamin	Online Form	10/12/21	4-1
Lockwood	Callie	Email	08/19/21	9-291
Logan	Jonathan	Email	09/24/21	4-1
Logan	Jonathan Link	Letter	10/13/21	7-94, 7-9, 4-71, 4-67, 4-61, 4-4, 4-3, 4-104, 4-1, 4-1, 7-133
Logan	Jonathan Link	Postcard	Unknown	7-9, 7-27, 7-131
Logan	Sharon	Email	08/10/21	9-291
Loia	Andrew	Online Form	10/12/21	4-1
Loken	Florence	Postcard	Unknown	7-141, 7-131, 7-129
London, Jr.	Sam	Petition	Unknown	9-334
Long	Reverend John	Email	08/10/21	9-291
Longhouse	SweetGrass	Email	08/10/21	9-291
Longyear	Sharon	Email	08/10/21	9-291
Loomba	Mary	Email	08/10/21	9-291
Lopane	Andrew	Online Form	10/11/21	4-47
Lopez	Ericka	Email	08/10/21	9-291
Lopez	Fideneio	Postcard	Unknown	7-141, 7-131, 4-54
Lopez	Nicole	Postcard	Unknown	7-6, 7-148, 7-133
LoRe	Catherine	Online Form	10/13/21	4-1
Lorenz	Josef	Email	10/14/21	9-291
Lorenz	Josef	Online Form	10/12/21	4-1
Loretto		Letter	10/07/21	4-12
Lotito	Mark	Email	08/11/21	9-291
Lott	Larry	Postcard	Unknown	7-89, 4-56
Lotto	Peter	Email	09/13/21	8-15
Lotto	Peter	Online Form	10/14/21	4-1, 4-1
Loure	Bonita	Petition	Unknown	9-334
Love	Karessa	Petition	Unknown	9-334
Love	Lucreaty	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Love	Tiara	Postcard	Unknown	7-9, 7-6, 4-54
Lovejoy-Grinnell	Bryn	Postcard	Unknown	7-4, 4-104, 4-46, 7-129
Lovell	Daryl	Petition	Unknown	9-334
Lowe	Erin	Email	10/13/21	9-291
Lowe	Ronald	Postcard	Unknown	7-27
Lowenthal	Steven	Email	08/10/21	9-291
Lower	David Allen	Online Form	10/04/21	6-5, 6-1
Lowitz	Sue	Petition	Unknown	9-334
Lowry	Mr.	Oral	09/08/21	7-106, 4-17
Lucas	Sheila	Petition	Unknown	9-334
Luckibi	Rachelle	Postcard	Unknown	7-133, 7-131, 7-131
Ludden	Joshua	Postcard	Unknown	7-129, 4-46, 4-46
Luedeman	Sonya	Email	10/14/21	9-291
Luison	Jenn	Postcard	Unknown	7-27, 7-27, 7-142
Lukens	Mark	Email	08/10/21	9-291
Lumens	Karen	Email	08/10/21	9-291
Lund	Amy	Email	08/10/21	9-291
Lundy	Jeanette	Petition	Unknown	9-334
Luther	Emily	Postcard	Unknown	7-27, 7-27, 7-138, 8-6, 8-8
Lyden	Joseph	Email	08/10/21	9-291
Lynagh	Leahann	Email	10/06/21	4-94
Lynch	Davona	Email	08/03/21	9-291
Lynch	Davona	Postcard	Unknown	7-32, 7-27, 7-133
Lynch	Laura	Email	08/10/21	9-291
Lynch	Patrick	Email	08/07/21	9-291
Lynne	Amy	Petition	Unknown	9-334
Lynne	Howard	Written Form	08/18/21	3-2
Lynn-Ford	Patricia	Online Form	10/14/21	6-9
Lysy	Dusan	Email	10/13/21	9-291
Lyte	Velma	Email	08/10/21	9-291
M	Mike	Email	10/13/21	9-291
M----	R-----	Petition	Unknown	9-334
M----	Roslyn	Petition	Unknown	9-334
M-----	Ka-----	Petition	Unknown	9-334
M.	Bob	Email	08/19/21	9-291
M.	Janice	Email	08/11/21	9-291
M.	Sean	Email	08/10/21	9-291
M.	Robert	Written Form	09/09/21	7-4
M.	T.	Written Form	09/09/21	7-4
Maag	Ken	Online Form	07/19/21	6-63
Maall	Hussein	Postcard	Unknown	7-142, 7-133, 7-131
Mabie	Pat	Postcard	Unknown	7-32, 7-133, 7-131
Mabrey	Lanika	Petition	Unknown	9-334
Mac Martin	Gordon	Email	08/10/21	9-291
MacAdam	Mark	Email	08/10/21	9-291
Macaulay	Mark	Email	10/13/21	9-291
MacDonald	Eli	Postcard	Unknown	7-133
Macdonald	Nick	Email	10/13/21	9-291
MacFarlane	Scott	Oral	08/17/21	8-12, 8-1, 7-133, 4-70, 4-46
Maciejewski	Michele	Online Form	10/12/21	4-1
Mack	BJ	Email	08/11/21	9-135, 9-133, 7-52
Mack	Ernest	Petition	Unknown	9-334
Mack	Ernest	Petition	Unknown	9-334
Mack	Walter	Petition	Unknown	9-334
Mackin	Scott	Email	10/06/21	6-9
MacKrell	Benjamin	Email	10/13/21	9-291
MacMartin	Gordon	Email	10/13/21	9-291
Macor	Silvia	Postcard	Unknown	4-1
MacPherson	Cameron	Online Form	10/13/21	4-1
MacPherson	Richard	Online Form	10/14/21	4-1
MacWhinnie	Stephen	Email		9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Madden	Mike	Email	08/10/21	9-291
Maddox	Deborah	Petition	Unknown	9-334
Maddox	DeMonty	Petition	Unknown	9-334
Maddox	Edward	Petition	Unknown	9-334
Madeska	Valerie	Email	08/10/21	9-291
Madory	Edward	Email	08/11/21	9-291
Magee	Anuradha	Email	10/13/21	9-291
Mager	Andy	Postcard	Unknown	7-27, 7-32, 7-131
Magnarelli	V. James	Email	09/03/21	7-52
Magnarelli	V. James	Letter	09/01/21	7-52
Magnarelli	William	Letter	08/24/21	7-53, 7-52, 7-52, 7-21, 7-138, 7-129, 6-1, 5-9, 4-61
Magnarelli	William	Oral	08/24/21	7-52, 7-32, 7-21, 6-1, 5-17, 5-10, 3-1
Mahar	Crista	Postcard	Unknown	7-9, 7-131, 7-129
Mahoney	Kristin	Email	08/18/21	4-71, 4-106, 4-1
Mahoney Stopyra	Melanie	Online Form	10/13/21	7-81, 7-116, 6-1
Mahony	Liz	Email	08/10/21	9-291
Majok	Chol	Petition	Unknown	9-334
Makman	Marianne	Email	10/13/21	9-291
Malandra	Joseph	Online Form	10/09/21	5-10
Malay	Daniel	Postcard	Unknown	9-253 through 9-257
Maldonado	Anita	Email	08/10/21	9-291
Malik	Linda	Petition	Unknown	9-334
Malik	Linda	Postcard	Unknown	7-32, 7-131, 7-133
Malik	Linda	Postcard	Unknown	7-27, 7-27, 7-27
Malik	Linda	Postcard	Unknown	7-32, 7-27, 7-27
Mallaro	Lynn	Petition	Unknown	9-334
Mallory	Ulysee	Petition	Unknown	9-334
Malloy	Lauren	Petition	Unknown	9-334
Maloff	Jeff	Online Form	09/08/21	5-10, 4-2
Malone	Edmond	Email	08/10/21	9-291
Maloney	Matt	Online Form	10/14/21	4-61, 4-1
Malsheimer	Fran	Email	10/13/21	9-291
Mandel	Tommy	Email	08/10/21	9-291
Mandresh	Jason	Online Form	10/12/21	4-1
Maness	Ryan	Email	08/19/21	9-291
Mankes	Leslie	Email	08/10/21	9-291
Manley	Alex	Online Form	10/12/21	4-1
Mann	Daniel	Email	08/10/21	9-291
Manning	Robert	Postcard	Unknown	7-32, 7-27, 7-148
Manno	Jack	Petition	Unknown	9-334
Manogliese	Gia	Petition	Unknown	9-334
Manor	Lorraine	Online Form	09/10/21	5-10
Manring	Margaret_John	Letter	08/19/21	6-9
Manthey	Brian	Online Form	10/14/21	3-1
Manuel	Dequan J.	Petition	Unknown	9-334
Manuel	Jasmine	Postcard	Unknown	7-6, 7-141, 4-46
Mar	L----	Petition	Unknown	9-334
Marcotte	Camille	Email	10/12/21	9-291
Marcus	Jack David	Email	08/10/21	9-291
Marcus	Jill	Email	10/13/21	9-291
Margai	Konya	Email	08/10/21	9-291
Margol	Samuel	Petition	Unknown	9-334
Margolis	James	Email	08/10/21	9-291
Marinaccio	Patricia	Email	10/13/21	9-291
Marinides	Alex	Postcard	Unknown	7-84, 7-27, 7-148
Marino	Marie	Online Form	09/28/21	5-10
Marion	Connie	Oral	08/31/21	7-93
Mark	Justin	Petition	Unknown	9-334
Mark	Wanakry	Petition	Unknown	9-334
Markowitz	Benjamin	Online Form	08/03/21	4-2

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Marks	Eva	Email	10/13/21	9-291
Marks	Melissa	Petition	Unknown	9-334
Marlin	Elise	Petition	Unknown	9-334
Marques	Lauren	Petition	Unknown	9-334
Marquette	Chris	Email	10/13/21	9-291
Marquette	Christine	Email	08/10/21	9-291
Marquis	Mary	Petition	Unknown	9-334
Marrain	Merlin	Petition	Unknown	9-334
Marrero	Luis	Postcard	Unknown	7-133
Marsellus	John	Oral	08/31/21	4-49, 4-47
Marshall	Erin	Email	10/16/21	9-291
Marston	Steven	Petition	Unknown	9-334
Martella	Diane	Email	08/10/21	9-291
Martin	Adam	Email	10/13/21	9-291
Martin	Barbara	Email	08/19/21	9-291
Martin	Brittany	Email	08/19/21	9-291
Martin	Geraldine	Email	10/13/21	9-291
Martin	Glenn	Email	08/10/21	9-291
Martin	Shirley A.	Petition	Unknown	9-334
Martin	Taj	Petition	Unknown	9-334
Martin	TaJuddin	Postcard	Unknown	4-67, 4-46, 4-104
Martin	Tysha	Postcard	Unknown	7-9, 7-27, 7-131, 7-21, 7-133
Martineck	Dani	Email	08/19/21	9-291
Martinez	Marilyn	Petition	Unknown	9-334
Martino	Theondis	Petition	Unknown	9-334
Martins	Claude	Email	08/11/21	9-291
Martins	Claudio	Email	10/13/21	9-291
Martucci	Elizabeth	Email	08/10/21	9-291
Marusa	Joseph	Postcard	Unknown	7-133
Marusa	Joseph M.	Petition	Unknown	9-334
Mary	Mary	Email	10/14/21	9-291
Marziale	Karen	Voicemail	10/14/21	2-1
Masara	Rafael	Postcard	Unknown	7-129, 4-54
Maslanka	Geraldine	Email	08/10/21	9-291
Mason	Kamesha	Postcard	Unknown	7-131, 7-129, 7-129
Mason	Kaniesha	Postcard	Unknown	7-6, 7-27, 7-142
Mason	Keanna	Postcard	Unknown	7-138, 7-131, 4-104
Mason	Marcus	Postcard	Unknown	7-133
Mason	Melvina W.	Petition	Unknown	9-334
Mason	Travis	Postcard	Unknown	7-9, 7-4, 7-27
Massey	Sherry	Postcard	Unknown	7-89, 7-6, 7-149
Massie	Brittney	Postcard	Unknown	7-9, 7-32, 7-129
Massie	Heather	Postcard	Unknown	7-27, 7-141, 7-129
Masterpole	Marty	Postcard	Unknown	7-89, 7-27, 7-129
Mastorgi	Barbara	Email	08/10/21	9-291
Mateo	Celso (Bobby)	Postcard	Unknown	7-9, 7-32, 7-27
Mathis	Hollis	Postcard	Unknown	7-89, 7-141, 4-54
Mathis	Leah	Petition	Unknown	9-334
Mathis	R	Voicemail	09/04/21	4-54
Mathis	Yaleeda	Postcard	Unknown	7-89, 7-6, 7-149
Mathrani	Vandana	Email	08/10/21	9-291
Mathys	Sue	Email	08/10/21	9-291
Matteson	Patricia	Email	08/10/21	9-291
Matthews	George	Online Form	08/05/21	4-70, 4-61, 4-47, 4-46, 4-20
Matthews	Larissa	Email	08/10/21	9-291
Matthews	William	Email	08/10/21	9-291
Mattison	Barbara	Petition	Unknown	9-334
Maxfield	Sarah	Email	08/10/21	9-291
Maxwell	Elizabeth	Email	08/10/21	9-291
Maxwell	James P.	Written Form	08/18/21	4-1
Maxwell	Jessica	Email	08/04/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
May	S. Rachel	Petition	Unknown	9-334
May	Sen. Rachel	Postcard	Unknown	7-32, 7-148, 7-133, 4-54
Mayer	Andy	Petition	Unknown	9-334
Mayer	Carole	Email	08/10/21	9-291
Mayers	DoeWayn	Email	08/10/21	9-291
Mayes	Elizabeth	Petition	Unknown	9-334
Mayfield	Shante	Postcard	Unknown	7-133
Maylin	Grace	Email	08/11/21	9-291
Mays	Carolyn	Postcard	Unknown	7-32, 7-27, 7-148
Mazer	Ariel	Email	10/13/21	9-291
Maziuk	Stanley	Online Form	09/07/21	4-2
Mazzotti	Frank	Online Form	08/18/21	4-2
Mbarushamohoro	Matama	Postcard	Unknown	7-27, 7-133, 7-131, 7-129, 7-21
Mc----	Sarah	Petition	Unknown	9-334
McAleer	Kevin	Email	08/10/21	9-291
McAster	Ladeshra	Petition	Unknown	9-334
McBride	Leigh	Email	08/15/21	9-291
McBride	Patricia	Postcard	Unknown	7-141, 7-138, 7-133, 7-21, 7-27
McBurney	Lowell	Online Form	07/16/21	7-99
McC	James	Postcard	Unknown	7-131, 7-129, 7-129
McCarthy	Bridget	Petition	Unknown	9-334
McCarthy	Joe	Letter	08/13/21	3-1
McCarthy	John	Petition	Unknown	9-334
McCarthy	Mary	Letter	08/13/21	3-1
McCarthy	Nichole	Email	08/03/21	9-291
McCarthy	Peter	Petition	Unknown	9-334
McCarthy	Peter	Postcard	Unknown	7-6, 7-21, 7-133
McCartney	Peter	Postcard	Unknown	7-27, 7-32
McCarty	Bridget	Petition	Unknown	9-334
McCarty	Shane	Email	08/04/21	9-291
McCauley	Jennifer	Petition	Unknown	9-334
McCauley	Jennifer	Postcard	Unknown	7-142, 7-131, 4-54
McClain-Cosby	Maria A.	Petition	Unknown	9-334
McClure	Peter	Petition	Unknown	9-334
McCorley	Mari	Petition	Unknown	9-334
McCormack	Kevin	Oral	08/17/21	6-9
McCormiack	Kevin	Oral	08/18/21	6-9, 6-20, 6-19, 6-10, 4-66
McCormick	Robert	Postcard	Unknown	7-9, 7-4, 7-27, 4-125, 7-21
McCoy	Kimberly	Petition	Unknown	9-334
McCoy	Nancy	Oral	09/09/21	7-32, 6-32, 4-55, 2-1
McCoy	Nancy	Postcard	Unknown	4-61, 6-19
McCoy	Nancy	Postcard	Unknown	7-141, 4-54, 4-46
McCoy	Nancy	Written Form	09/09/21	7-4
McCray	Rebecca	Petition	Unknown	9-334
McCrea	Courtney	Petition	Unknown	9-334
McCrew	Donnell	Petition	Unknown	9-334
McCullen	Patricia	Petition	Unknown	9-334
McCullough	David	Petition	Unknown	9-334
McCullough	Rosa	Petition	Unknown	9-334
McCullough	Rosa	Petition	Unknown	9-334
McDaniel	Tiffany	Petition	Unknown	9-334
McDonald	Asha	Postcard	Unknown	7-32, 7-27, 7-142
McDonald	Billy	Postcard	Unknown	7-89, 7-149, 7-131
McDonald	Trenicha	Postcard	Unknown	7-4, 7-27, 7-27, 4-2
McDonald	Wayne	Online Form	10/09/21	4-2
McDonough	Mary Ann T	Email	10/13/21	9-291
McElwee	Heidi	Online Form	10/14/21	4-1
McFarland	Thomas	Email	08/10/21	9-291
McFarlane	Jon	Email	08/10/21	9-291
McFaul-Coon	Emily	Email	08/10/21	9-291
Mcgahee	Isaiah	Online Form	08/27/21	4-47

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
McGarry	William & Pamela	Email	08/24/21	6-9, 6-11, 6-1, 4-55, 4-2, 4-106, 3-1
McGeary	Mary	Email	08/10/21	9-291
McGee	Dynisha	Postcard	Unknown	7-84, 7-148, 7-148
McGovern	Nicholas	Email	10/13/21	9-291
McGrath	Amy	Online Form	09/09/21	7-8, 6-14
McGrath	Mark	Postcard	Unknown	7-9, 7-142, 7-131
McGrath	Patrick	Email	08/10/21	9-291
McGrew	Ralph	Email	10/14/21	9-291
McGrift	Robert	Postcard	Unknown	7-9, 7-6, 7-27
McIntyre	Elias	Postcard	Unknown	7-27, 7-27, 7-141
McIntyre	Katie	Postcard	Unknown	7-32, 7-27
McIntyre	Margaret	Email	08/10/21	9-291
McKee	Mark	Online Form	10/14/21	2-1
McKendree	Donna	Email	08/10/21	9-291
McKenna	James	Email	08/11/21	9-291
McKenna	Tess	Email	10/13/21	9-291
McKenzie	Anthony	Postcard	Unknown	4-2
McKenzie	Frederick	Petition	Unknown	9-334
McKinney	Eric	Email	09/04/21	9-291
McKinney	Sarah	Postcard	Unknown	7-32
McKinney	Tyrone	Postcard	Unknown	7-4, 7-27, 7-142
McKinnon	Richard	Postcard	Unknown	7-133
McKinstry	Jabace	Petition	Unknown	9-334
McKnight	Peter	Email	10/13/21	9-291
McLaughlin	Pam	Postcard	Unknown	7-6, 7-131
McLaurin-Taylor	Sheekesha	Postcard	Unknown	7-133
McLean	Gardner	Online Form	10/14/21	6-9
McLeod	Celest	Petition	Unknown	9-334
McLoughlin	C	Email	10/13/21	9-291
McLoughlin	Carol	Email	08/10/21	9-291
McLoughlin	Paul	Postcard	Unknown	7-6, 7-131
McLoy	Alizee	Petition	Unknown	9-334
McMillan	Claudette	Petition	Unknown	9-334
McMillan	Patricia	Email	08/10/21	9-291
McMillian	Kenneth	Postcard	Unknown	7-84, 7-4, 7-27
McMoy	Nancy	Postcard	Unknown	7-32, 7-133, 7-131
McNamara	Brendan	Online Form	10/14/21	4-1
Mcnamara	Joellen	Email	10/13/21	9-291
McNamara	Kerry	Email	08/10/21	9-291
McNaughton	Monique	Email	08/10/21	9-291
McNeil	Christine	Petition	Unknown	9-334
McNeil	Demitrios	Postcard	Unknown	9-253 through 9-257
McNeil	Demitrius	Postcard	Unknown	7-4, 7-32, 7-131, 7-21, 7-133
McNevin	Lizzy	Email	08/10/21	9-291
McNight	Peter	Email	08/10/21	9-291
McQuay	Saydee	Petition	Unknown	9-334
McSherry	Heather	Email	08/11/21	9-291
McVicker-LaCroe	Hannah	Postcard	Unknown	7-6, 7-129, 7-129
Meadows	Rudy	Postcard	Unknown	7-138, 7-131, 7-129
Meany	Brian	Email	07/19/21	4-1
Medige	Theresa	Email	10/13/21	9-291
Medina	Annanya	Petition	Unknown	9-334
Meehan	Carol & Barry	Email	10/13/21	9-291
Meenan	Brandon	Email	07/09/21	9-291
Meggesto	James	Letter	08/24/21	7-48
Mehlek	John	Online Form	10/14/21	6-5
Mehlman	Arlene	Email	10/14/21	9-291
Mehls	William	Email	08/11/21	9-291
Mehta	Rochan	Email	10/13/21	9-291
Meir	Chana	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Meiss	Martin	Petition	Unknown	9-334
Meives	Caitlin	Email	08/02/21	9-291
Melendez	Suzette	Email	10/13/21	9-291
Melfi	Eric	Online Form	07/19/21	7-112
Melfi	Eric	Written Form	08/18/21	7-112, 7-110
Melki	Julie	Postcard	Unknown	7-27, 7-141, 7-133
Melki	Lindsey	Postcard	Unknown	7-141, 7-133, 4-54
Mellen	Allen	Email	10/13/21	9-291
Melnichenko	Yelena	Email	08/10/21	9-291
Memmert	Jonathan	Email	08/10/21	9-291
Mendelsohn	Ellen	Email	08/10/21	9-291
Mendez-Torres	Myrza	Email	08/10/21	9-291
Menegio-Stahl	Kaitlyn	Email	10/13/21	9-291
Menifee Jr.	Ashley	Postcard	Unknown	7-133
Menon	Melissa	Oral	09/09/21	7-8, 7-133, 7-129
Mensch	Henry	Postcard	Unknown	9-264, 7-9, 7-131, 4-1
Menter	BJ	Online Form	09/08/21	4-2
Menter	Mrs. Robert	Online Form	10/08/21	4-2
Menz	Sara	Email	08/11/21	9-291
Mercenis	John	Oral	09/01/21	7-135, 7-112
Merckx	Guy	Email	08/10/21	9-291
Meriffee, Jr.	Ashley	Petition	Unknown	9-334
Meriwether	Rae Ann	Postcard	Unknown	7-89, 7-141, 7-133
Merola	Rob	Online Form	10/12/21	4-1
Merritt	B.	Online Form	10/13/21	4-1
Merritt	Brian L.	Petition	Unknown	9-334
Merritt	Donald L.	Petition	Unknown	9-334
Merriweather	Rondell	Postcard	Unknown	7-27, 7-27, 7-27
Merriweather	Ronnie	Postcard	Unknown	6-1, 7-6, 7-9, 7-21
Metcalf	Elizabeth	Petition	Unknown	9-334
Metcalf	Marissa	Postcard	Unknown	7-9, 7-149, 4-104
Metz	Albert	Email	08/07/21	9-291
Metz	Thomas & Patricia	Online Form	09/25/21	6-13, 3-1
Metzler	JoAnne	Email	08/10/21	9-291
Meyers	Larry	Postcard	Unknown	7-6, 7-4, 7-142
Mhina	Kathleen	Petition	Unknown	9-334
Michael	Therese	Email	10/13/21	9-291
Michaels	William	Letter	10/14/21	3-1
Michalenko	Edward M.	Letter	09/09/21	8-15, 8-12, 8-1
Michel	David	Email	08/31/21	7-133, 4-60, 4-55, 4-51, 4-4
Michel	Greg	Postcard	Unknown	7-133
Michel	Gregory	Email	10/13/21	9-291
Michel	Gregory	Petition	Unknown	9-334
Michel	Gregory	Petition	Unknown	9-334
Middlebrooks	Ethan	Email	08/11/21	9-291
Middleton	Tyrone	Postcard	Unknown	7-133
Mike	Robert	Postcard	Unknown	7-89, 7-6, 7-133
Mike Sr	James	Postcard	Unknown	7-4, 7-27, 7-142
Mikoma	Halima	Petition	Unknown	9-334
Miletic	Nina	Petition	Unknown	9-334
Millizio	Patricia	Email	08/10/21	9-291
Mille	David	Online Form	08/06/21	5-10
Miller	Alaikia	Email	10/13/21	9-291
Miller	Christopher	Email	10/06/21	4-94
Miller	Dorothy	Email	08/10/21	9-291
Miller	Francine	Email	08/10/21	9-291
Miller	Jacob	Email	10/14/21	4-1
Miller	Johanna	Email	08/10/21	9-291
Miller	Johanna	Postcard	Unknown	7-89, 7-141, 4-54
Miller	John	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Miller	Laura	Online Form	08/10/21	8-12, 8-1, 6-3, 6-27, 5-10
Miller	Laura	Oral	08/17/21	8-12, 8-1, 7-5
Miller	Laura	Postcard	Unknown	7-89, 7-6, 7-149
Miller	Linda	Email	08/06/21	9-291
Miller	Melissa	Email	08/10/21	9-291
Miller	Michael	Email	10/06/21	4-94
Miller	Peter	Email	08/10/21	9-291
Miller	Rachel	Email	10/13/21	9-291
Miller	Russell	Email	08/10/21	9-291
Miller	Sadie	Postcard	Unknown	7-133
Miller	Tamisha	Postcard	Unknown	7-133
Miller	Tybel	Email	08/10/21	9-291
Millhollen	Pilar	Email	10/14/21	9-291
Millman	Nicole	Email	08/10/21	9-291
Millman	Toby	Online Form	07/27/21	6-9
Mills	Anice	Email	08/10/21	9-291
Mimligan	Sascha	Online Form	09/20/21	4-29, 4-28, 4-22
Mims II	Vernon W.	Postcard	Unknown	7-27, 7-141, 7-133
Mindy	Jack	Email	08/10/21	9-291
Minis	Lauren	Email	08/08/21	9-291
Minus	Anton	Petition	Unknown	9-334
Miranda	John	Petition	Unknown	9-334
Miranda	John	Petition	Unknown	9-334
Misener	Carolyn	Letter	10/03/21	6-5, 6-11
Mitchell	Christina	Petition	Unknown	9-334
Mitchell	Laura	Postcard	Unknown	7-84, 7-148, 4-104, 7-1, 7-129
Mitchell	Lotan	Petition	Unknown	9-334
mitchell	luke	Online Form	08/12/21	6-5
Mitchell	Melissa	Petition	Unknown	9-334
Mitchell	Michael	Email	08/10/21	9-291
Mitchell	Monique	Petition	Unknown	9-334
Mitchell	Stephen	Email	08/10/21	9-291
Mitchell, Jr.	Eddie	Petition	Unknown	9-334
Mitchell, Jr.	Eddie	Petition	Unknown	9-334
Mitchell, Sr.	Edward L.	Petition	Unknown	9-334
Mix	David	Online Form	09/10/21	4-2
Mix	David	Online Form	09/10/21	4-2
Mlawski	Leslie	Email	10/13/21	9-291
Mlodliar	Kira	Email	10/13/21	9-291
Mobarez	Malik	Petition	Unknown	9-334
Mock	Ethel	Petition	Unknown	9-334
Moderacki	Deirdre	Email	08/10/21	9-291
Modrak	Fiona	Postcard	Unknown	7-21, 7-27, 7-141, 7-21, 7-27, 7-141
Moe	Helen	Email	08/10/21	9-291
Moeller	Gary	Email	10/13/21	9-291
Mohamed	Abdinoor	Postcard	Unknown	7-9, 7-6, 7-27
Mohamed	Aziza	Petition	Unknown	9-334
Mohamed	Aziza	Postcard	Unknown	9-253 through 9-257
Mohamed	Fatima	Postcard	Unknown	7-27, 7-142, 7-131
Mohamed	Ismahan	Postcard	Unknown	9-264, 7-133, 7-131
Mohamed	Munira	Postcard	Unknown	7-6, 7-133, 7-131, 7-129
Mohammed	Ayesha	Email	10/14/21	9-291
Molldrem	Bernhard	Online Form	07/20/21	4-93
Molldrem	Leslie	Online Form	10/14/21	7-99, 4-90, 4-55, 4-1
Molnar	Erika	Email	08/10/21	9-291
Moltion	Wendy	Oral	08/31/21	6-3, 2-4
Monclova	Marilyn	Email	10/13/21	9-291
Moneti	Carlo	Email	10/12/21	5-8
Monkemeyer	Lenora	Petition	Unknown	9-334
Monkemeyer	Lenora	Postcard	Unknown	6-15, 7-129
Monkemeyer	Lenora	Postcard	Unknown	5-23, 7-139

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Monroe	Madison	Petition	Unknown	9-334
Monserate	Crystal	Petition	Unknown	9-334
Montanez Shipper	Nimia Rosa	Email	08/10/21	9-291
Montero	Marianne	Email	10/13/21	9-291
Montgomery	Chris	Petition	Unknown	9-334
Montgomery	Chris	Postcard	Unknown	7-9, 7-32, 7-129
Montgomery	Chris	Postcard	Unknown	7-6, 7-27, 7-27
Montgomery	Chris	Postcard	Unknown	7-32, 7-133
Montgomery	Christopher	Petition	Unknown	9-334
Montgomery	Kate	Online Form	09/06/21	4-1
Montgomery	Tanyana	Petition	Unknown	9-334
Montoya Munoz	Rocio	Email	08/11/21	9-135, 9-133, 7-52
Montreal	Sharon	Petition	Unknown	9-334
Montroy	Derek	Online Form	07/28/21	4-70
Moodliar	Kira	Email	08/03/21	9-291
Moody	Janet	Petition	Unknown	9-334
Moody	Tony	Petition	Unknown	9-334
Mooney	Karen	Email	08/10/21	9-291
Moore	April	Petition	Unknown	9-334
Moore	Brian & Chevelle	Postcard	Unknown	7-32, 7-27, 7-131
Moore	Grey	Email	10/15/21	9-291
Moore	Lynn	Petition	Unknown	9-334
Moore	Sebastian	Petition	Unknown	9-334
Moore	Shawnasha	Postcard	Unknown	4-126, 6-1, 7-131
Moore	Steven	Postcard	Unknown	7-84, 7-27, 7-148
Moore	Tanesha	Email	08/11/21	9-291
Mora	Alexander	Email	10/13/21	9-291
Morales	Alvin	Email	08/19/21	9-291
Morales	Kaja	Petition	Unknown	9-334
Moran	Martha	Email	08/11/21	9-291
Moran	Sharon	Email	10/13/21	9-291, 7-118
Morano	Anthony	Postcard	Unknown	4-67, 4-46, 4-104
Morano	Timothy	Postcard	Unknown	9-253 through 9-257
More	John	Online Form	08/02/21	4-135
Morgan	Catherine	Email	07/27/21	9-291
Morgan	James	Written Form	07/23/21	4-102
Morgan	Marilyn	Online Form	10/11/21	4-2, 2-1
Morgan	Pamela	Petition	Unknown	9-334
Morgan	Will	Postcard	Unknown	7-89, 7-141, 4-54
Moros	Sarah	Email	08/10/21	9-291
Morrell	Kim	Postcard	Unknown	7-27, 7-131, 4-104, 7-21, 7-32
Morris	Anna	Petition	Unknown	9-334
Morris	Anna	Postcard	Unknown	7-84, 4-67, 4-54
Morris	Anna	Postcard	Unknown	6-3, 4-46, 4-104
Morris	Florence	Email	10/14/21	9-291
Morris	Greggory	Email	08/10/21	9-291
Morrison	DeVaughna	Oral	09/13/21	4-1
Morrison	Liza	Email	09/06/21	7-133, 4-1
Morrison	Liza	Online Form	07/16/21	4-1
Morrison	Marcia	Oral	09/13/21	5-13, 4-1
Morrison	Sally	Email	08/10/21	9-291
Mortise	Teresa	Email	10/15/21	5-10
Morton	Adrienne	Petition	Unknown	9-334
Mosher	Christina	Postcard	Unknown	7-138, 6-3, 4-104
Moskal	Jeanne	Email	08/24/21	9-291
Mosley	George	Petition	Unknown	9-334
Mosley	Joanne	Email	08/10/21	9-291
Mosley	Pauline	Petition	Unknown	9-334
Mosley	Zonaira	Petition	Unknown	9-334
Moss	Annie	Petition	Unknown	9-334
Mott	Amy	Email	08/19/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Mott	Gail	Email	10/13/21	9-291
Moving People Transportation Coalition		Email	10/06/21	8-11, 7-99, 7-9, 7-6, 7-133, 7-131, 7-129, 4-71, 4-61, 4-43, 4-134, 4-1
		Email	10/06/21	6-94, 6-3, 6-28, 5-4, 4-7, 4-5, 4-4, 4-15, 4-138
		Email	08/07/21	8-6, 8-2, 7-133, 4-71, 4-53, 4-49, 4-4
Mrakovic	Emma	Email	09/22/21	4-47
Mudrick	Nancy	Email	09/02/21	4-1
Mufson	Susan Alice	Email	10/13/21	9-291
Muhammad	Akbar S.	Petition	Unknown	9-334
Muhammad	Anisah	Petition	Unknown	9-334
Muhammad	Anisah	Postcard	Unknown	7-133
Muhammad	Genghis	Petition	Unknown	9-334
Muhammad	Genghis Khalid	Petition	Unknown	9-334
Muhammad	Genghis Khalid	Petition	Unknown	9-334
Muhammad	Genghis Khalid	Postcard	Unknown	7-27, 7-27, 7-129
Mukai	Marianne	Email	10/13/21	9-291
Munawet	Terrin	Petition	Unknown	9-334
Muok	Gwendolyn	Postcard	Unknown	7-84, 7-32, 7-133
Murphy	Diana	Voicemail	08/15/21	4-2
Murphy	Garran	Postcard	Unknown	7-6, 7-142, 7-129
Murphy	Kellie	Postcard	Unknown	7-32, 7-142, 7-129
Murphy	Margaret	Email	08/10/21	9-291
Murphy	Marianne	Postcard	Unknown	7-149, 7-138, 4-67, 7-32, 7-131
Murphy	Sheila	Email	08/10/21	9-291
Murray	Caress	Postcard	Unknown	7-141, 7-133, 4-54
Murray	Neoma	Petition	Unknown	9-334
Murray	Stephanie	Email	08/10/21	9-291
Murray	Trudy	Email	10/14/21	9-291
Musa	Khadija	Postcard	Unknown	7-27, 7-142, 7-129, 4-1, 7-21
Musa	Salima	Postcard	Unknown	7-27, 7-131, 7-129, 4-1
Mushetu	Dieuveut	Postcard	Unknown	7-131, 7-129, 4-54
Mustapha	Abdul-Ra'oof	Petition	Unknown	9-334
Mustapha	Arleata	Petition	Unknown	9-334
Muta-----	Innocent	Petition	Unknown	9-334
Mutolo	Ben	Postcard	Unknown	4-125, 7-9, 7-21, 8-6, 8-8
Mwunvanoza	Claude	Petition	Unknown	9-334
Myers	Benjamin	Petition	Unknown	9-334
Myers	Carol	Email	08/10/21	9-291
Myles	Charles	Petition	Unknown	9-334
N.	Laura	Postcard	Unknown	7-6, 7-138, 4-104
Naeser	Mark	Email	08/10/21	9-291
Nahar	Jonathan	Postcard	Unknown	7-84, 7-6, 7-27
Nahar	Sarah	Postcard	Unknown	7-148, 4-67, 7-27
Naidich	Sandra	Email	08/10/21	9-291
Nandagiri	Courtney	Email	09/22/21	9-291
Napoletano	Robert	Online Form	10/14/21	7-84, 7-52, 6-3, 2-1
Napolitano	Marie	Email	08/10/21	9-291
Nash	Jenna	Online Form	10/13/21	4-1
Nash	Maryanne	Email	08/11/21	9-135, 9-133, 7-52
Nason	Joshua	Postcard	Unknown	7-133
Natkins	Judith	Email	08/10/21	9-291
Naughton	Peter	Email	09/07/21	6-68, 4-30, 4-142, 4-124, 4-1
Nazarian	Lila	Online Form	10/13/21	4-1
Neal	Grace Kelley	Petition	Unknown	9-334
Neal	Lunedia	Petition	Unknown	9-334
Neal	Richard	Petition	Unknown	9-334
Neighbors of the Onondaga Nation		Letter	10/14/21	9-325 through 9-328
Neill-Turner	Sonja	Email	08/10/21	9-291
Neiman	Laura	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Nels	Jim	Voicemail	08/17/21	2-1
Nelson	Anne	Email	10/17/21	9-291
Nelson	Cheryl	Email	09/01/21	3-1
Nelson	Christianna	Email	08/10/21	9-291
Nelson	Gary	Email	10/13/21	9-291
Nelson	Joseph	Email	08/10/21	9-291
Nelson	Kevin	Email	08/10/21	9-291
Nelson	Leah	Email	10/13/21	9-291
Nelson	Mary N.	Petition	Unknown	9-334
Nelson	Naomi	Petition	Unknown	9-334
Nelson	Nigel	Postcard	Unknown	7-133
Nelson	Robert	Petition	Unknown	9-334
Nelson	Timothy	Email	10/14/21	2-3
Nemeth	Steven	Email	08/19/21	9-291
Nerode	Nathanael	Online Form	08/13/21	4-1
Nesbitt	April	Petition	Unknown	9-334
Nesredin	Nadia	Email	08/17/21	9-291
Neufang, Jr.	Robert	Online Form	08/16/21	8-3
Neugebauer	Don	Online Form	10/14/21	7-52
Neumann	Ted	Email	08/10/21	9-291
Newman	Eric	Email	08/10/21	9-291
Newton	Bernard	Postcard	Unknown	7-4, 7-27, 7-131
Newton	Carl	Petition	Unknown	9-334
Newton	Jessie	Petition	Unknown	9-334
Newton	Richard	Postcard	Unknown	7-89, 7-6, 7-149
Newton	Tralishia	Petition	Unknown	9-334
Ng	Linda	Email	08/10/21	9-291
Nguyen	Anna	Postcard	Unknown	7-149, 7-148, 4-54
Nguyen	Hao	Postcard	Unknown	7-27, 7-138, 4-104
Nguyen	Mary	Email	08/11/21	9-135, 9-133, 7-52
Nguyen	Sihn	Email	08/11/21	9-135, 9-133, 7-52
Ngwaihi	Tabitha	Postcard	Unknown	7-89, 7-27, 7-141, 7-32
Nicastro	Emily	Petition	Unknown	9-334
Nicholas	Bob	Online Form	09/01/21	4-1
Nicholas	Peter	Email	10/13/21	9-291
Nicholas	Richard	Email	10/06/21	5-17
Nicholas	Richard	Online Form	10/06/21	5-17
Nicholas	Thomas	Email	08/11/21	9-291
Nichols	Eugene	Petition	Unknown	9-334
Nichols	Suzanne D.	Petition	Unknown	9-334
Nichols-Farquhar	Ben	Petition	Unknown	9-334
Nicholson	Tommie E.	Petition	Unknown	9-334
Nickens	Denise	Petition	Unknown	9-334
Nicol	Deborah	Email	08/11/21	9-291
Nieto	Brandi	Email	10/13/21	9-291
Nigrini	Peter	Email	08/10/21	9-291
Nigro	Janice	Email	08/10/21	9-291
Niles	M. Karen	Email	08/10/21	9-291
Nilsson	Derinda	Email	10/13/21	9-291
Nimmons	Bob	Petition	Unknown	9-334
Niongimausu	Emmanuel	Petition	Unknown	9-334
Nix	Philip	Email	08/10/21	9-291
Noah	Aris	Email	08/19/21	9-291
Nobel	Barry	Email	08/10/21	9-291
Noble	John	Email	08/10/21	9-291
Noble	Leslie	Online Form	09/20/21	4-1
Noble	Stefanie	Online Form	10/13/21	4-1
Noel	Mark	Petition	Unknown	9-334
Nolan	Joalin	Postcard	Unknown	7-32, 7-142, 7-131
Nolan	Marcia	Online Form	08/13/21	6-11
Nolting	Sharon	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Norcross	Kyle	Online Form	10/13/21	4-1
Nordstrom	Barb	Email	08/19/21	9-291
Norris	Irma	Email	08/10/21	9-291
Northrup	Kristen	Voicemail	10/07/21	4-2
Northside Business Partnership		Letter	10/14/21	9-385 through 9-392
Northside UP/Franklin Square I-81 Working Group		Letter	10/14/21	9-393 through 9-416
Nottingham	Fatima	Email	10/15/21	9-291
Novak	Christine	Email	08/10/21	9-291
Nowak	Elizabeth	Voicemail	10/03/21	5-16
Noyes	Donna	Email	10/13/21	9-291
Nshimirimana	Jean Paul	Postcard	Unknown	7-9, 7-32, 7-27
Nurro	Johnathan	Petition	Unknown	9-334
NY State Senator Rachel May		Letter	10/13/21	9-315 through 9-324
NYCLU		Letter	10/14/21	9-253 through 9-291
NYCLU		Letter	09/27/21	4-1, 4-55, 7-9, 7-89, 7-133, 7-141
Nye	Kelly	Email	10/13/21	9-291
Nyman	Constance	Online Form	10/12/21	8-10, 7-9, 7-15, 4-78, 4-61, 4-56, 4-1
Nyman	Constance	Oral	08/25/21	4-66, 4-4
Nyong	Arnesio	Postcard	Unknown	9-264, 7-131
NYS Dept. of Agriculture & Markets		Letter	09/01/21	7-128
NYSDEC		Letter	09/13/21	9-137 through 9-150
NYSOPRHP		Letter	07/28/21	7-73
NYU Law Clinical Law Center		Letter	10/14/21	9-292 through 9-297
Oakley	Carol	Email	08/11/21	9-136, 9-135, 9-133, 7-52, 4-2
Oaks	Emily	Email	10/13/21	9-291
Oaks-Lee	Leon	Postcard	Unknown	7-9, 7-89, 7-6
Oaks-Lee	Rosemary	Postcard	Unknown	7-27, 7-133, 7-129, 4-1
Obie	Jessica	Email	08/16/21	9-291
O'Brien	Daniel	Email	08/10/21	9-291
O'Brien	Krysten	Email	08/19/21	9-291
O'Brien	Maggie	Postcard	Unknown	4-55, 7-21, 7-32
Occelli	Olivia	Email	10/13/21	9-291
Ochiabuto	Kirian	Voicemail	10/14/21	7-34
Ockenden	Ryan	Online Form	09/23/21	7-86
Ocon	Adam	Email	10/14/21	5-10
O'Connell	Karen	Letter	10/11/21	2-1
O'Connell	Marilyn	Email	10/13/21	9-291
OConnor	Gerry	Email	08/10/21	9-291
OConnor	Tierney	Email	08/24/21	9-291
O'Connor	Karen	Email	08/11/21	9-291
Odom	Chyrell	Petition	Unknown	9-334
Odom	Horace L	Postcard	Unknown	7-4, 7-142, 4-104
Odom	John	Postcard	Unknown	7-129, 7-133
Odom	Nicole	Online Form	07/16/21	7-18
Odoms	Helen	Postcard	Unknown	7-9, 7-131, 7-129
O'Donnell	Diane	Email	10/13/21	9-291
O'Donoghue	Caitlin	Postcard	Unknown	7-32, 7-27, 7-141
Odune	Ethel	Postcard	Unknown	7-89, 7-141, 4-54
Ogletree	Delia	Petition	Unknown	9-334
Ogletree	Fran---	Petition	Unknown	9-334
Ogletree	Joann	Postcard	Unknown	4-67, 4-46, 4-104
Ogletree	Lanasia	Petition	Unknown	9-334
Ogletree	Rodney	Petition	Unknown	9-334
Ogletree	Serenity	Petition	Unknown	9-334
Ogno	Rubina D.	Postcard	Unknown	7-84, 7-148, 7-138, 4-104
Ohman	Jamie	Online Form	08/18/21	7-32, 6-3
Olan	Kay	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Olaniyan	Lulu	Petition	Unknown	9-334
Olanoff	Rick	Petition	Unknown	9-334
Oldfield	Julienne	Postcard	Unknown	7-9, 7-149, 7-141, 7-133, 7-131
Oliver	Jimmy	Petition	Unknown	9-334
Oliver	Jimmy	Postcard	Unknown	7-89, 7-84, 7-141
Oliver	Russel	Email	10/14/21	9-291
Oliver-Grow	Tim	Oral	08/24/21	6-86
Olson	Carol R.	Petition	Unknown	9-334
O'Mahony	Donna	Postcard	Unknown	7-84, 4-67, 4-54
Omar	Ibrahim	Postcard	Unknown	7-27, 7-131, 7-129, 7-89, 7-141
O'Meara	Denise	Email	08/10/21	9-291
Omole	Anuoluwapo	Petition	Unknown	9-334
O'Neil	Thomas	Email	08/10/21	9-291
Ong	Lisa	Email	10/13/21	9-291
Onondaga County Supervisors		Letter	07/29/21	8-1, 8-2
Oppedisano	Donna	Petition	Unknown	9-334
Oritz	Vm	Email	10/13/21	9-291
O'Rourke	Judith	Email	08/20/21	4-1
Orphé	Tirema	Petition	Unknown	9-334
Orr	Donte	Petition	Unknown	9-334
Orszulak	Samantha	Email	08/29/21	9-291
Ortiz	VM	Email	08/10/21	9-291
Ortolano	Michele	Email	10/15/21	9-291
Osborne	Nicole	Postcard	Unknown	7-6, 7-27, 4-54
Osgood	Caleb	Petition	Unknown	9-334
Osmun	Andrew	Online Form	09/08/21	6-3, 3-1
Osorio	Garver	Email	08/10/21	9-291
Ossenbruggen	Paul	Online Form	08/24/21	4-1
O'Sullivan	Kait	Postcard	Unknown	7-133
O'Sullivan	Kaitlin	Petition	Unknown	9-334
Otis	Janice	Email	08/10/21	9-291
Otts	Annabel	Email	07/18/21	9-291
Otts	Annabel	Online Form	09/03/21	9-291, 7-10, 4-47
Ours	Martha	Letter	09/01/21	4-71, 4-4, 4-1
Ours	Martha	Postcard	Unknown	4-4
Ours	Martha	Oral	09/01/21	7-152, 4-70, 4-4, 4-104, 4-1
Owens	Anthony	Postcard	Unknown	7-4, 7-27, 7-27
Owens	Duane	Postcard	Unknown	7-32, 7-27, 7-138
Owens	Isaac	Petition	Unknown	9-334
Owens	Laquitia	Petition	Unknown	9-334
Owens	Sharon	Petition	Unknown	9-334
Owens	Zachary	Email	08/11/21	9-135, 9-133, 7-52
Oxendine	Jennifer	Postcard	Unknown	7-133
Ozols	Karon	Email	08/10/21	9-291
P	Cyrille	Email	10/13/21	9-291
P.	Jauqeem	Petition	Unknown	9-334
P.	Kristin	Postcard	Unknown	7-9, 7-4, 7-32
Pace	Bob	Email	09/28/21	3-1
Pace	Rosemarie	Email	08/10/21	9-291
Pace, Jr.	Edgar	Postcard	Unknown	7-141, 7-131, 7-129
Packard	Thomas	Email	10/13/21	5-10, 4-55, 4-2
Pagano	Joan	Online Form	10/01/21	4-2
Page	Liz	Petition	Unknown	9-334
Page	Liz	Postcard	Unknown	7-32, 7-27, 7-141
Page	Miner	Postcard	Unknown	7-89, 7-6, 7-149
Paige	Etrindia	Petition	Unknown	9-334
Paige	Melissa	Email	08/10/21	9-291
Paikin	Jacqui	Letter	07/22/21	8-12, 8-1
Painter	Carol	Email	08/27/21	9-291
Palamara	Olivia	Email	10/13/21	9-291
Palevsky	Sheila	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Palladino-Walsh	Lisa	Email	10/12/21	9-291
Palmer	Harvey	Postcard	Unknown	7-6, 7-142, 7-131
Palmer	Joshua	Petition	Unknown	9-334
Palmieri	Walt	Written Form	08/18/21	7-75
Palmo	Kim	Email	10/13/21	9-291
Paniagua	Rita	Postcard	Unknown	7-6, 7-148, 7-141
Paniagua	Rita	Postcard	Unknown	7-6, 7-131, 7-129
Paolini	Edward	Online Form	07/20/21	3-1
Pardee	Lawrence	Voicemail	10/13/21	4-2
Parisi	Pam	Email	08/10/21	9-291
Parisio	Nancy	Email	08/10/21	9-291
Parker	Darcus	Email	10/13/21	9-291
Parker	Eveny	Petition	Unknown	9-334
Parker	Every	Petition	Unknown	9-334
Parker	Jean	Postcard	Unknown	7-84, 7-131, 4-67
Parker	Pam	Email	08/10/21	9-291
Parker	Tatiana	Postcard	Unknown	7-32, 7-27, 7-131
Parker	Troy	Oral	08/25/21	4-1
Parker	Troy	Oral	08/25/21	4-53
Parkis	Harold	Online Form	10/11/21	3-2
Parnell	Beatrice	Postcard	Unknown	7-89, 7-141, 4-54
Paro	Nicholas	Email	10/06/21	4-94, 3-1
Parr	Daniel	Online Form	07/31/21	6-3
Parrish	Majestic M.	Postcard	Unknown	7-133
Parry	Maureen	Email	08/11/21	9-291
Parry	Sue	Email	08/10/21	9-291
Parsons	Carley	Online Form	10/13/21	4-1
Pascale	Emily	Online Form	10/13/21	7-141, 4-61
Pascall	Samuel	Online Form	10/14/21	4-1
Pascarella	Maria	Email	10/06/21	4-94
Pascarella	Stephanie	Email	10/06/21	4-94
Pascarella	Vittorio	Email	10/06/21	7-52, 4-94
Pasinski	David	Voicemail	10/14/21	7-84, 4-1
Paskel	Joquin	Online Form	07/22/21	7-32
Pasquale	Michael P.	Postcard	Unknown	7-133
Pastuf	John	Email	09/03/21	6-59
Patel	Ramanlal	Online Form	10/07/21	5-10
Patel	Viraj	Email	09/28/21	7-55
Patel	Viraj	Letter	08/02/21	8-12, 8-1
Patinaud	Shirley	Petition	Unknown	9-334
Patrice-Johnson	Shantanette	Postcard	Unknown	7-6, 7-131, 7-129, 7-27, 8-1
Patrician	Peter R.	Online Form	08/17/21	7-109, 6-28, 6-26, 6-24, 6-11
Patrick	Janet	Petition	Unknown	9-334
Patterson	C	Postcard	Unknown	7-141, 7-133, 7-129
Patterson	Conchi	Petition	Unknown	9-334
Patterson	Vallia	Petition	Unknown	9-334
Paul	Anthony	Petition	Unknown	9-334
Paul	Sandra	Petition	Unknown	9-334
Pavich	Karyn	Email	10/13/21	9-291
Pawatico	Joseph G.	Petition	Unknown	9-334
Paxton	G.	Email	08/10/21	9-291
Payne	Dennis	Oral	09/08/21	7-102, 7-101, 4-17
Payne	Donna	Email	08/10/21	9-291
Payne-Lewis	Julia	Email	08/10/21	9-291
Peace	Cynthia	Petition	Unknown	9-334
Peacock	Charles	Petition	Unknown	9-334
Pearson	Kathy	Petition	Unknown	9-334
Pearson	Sharron	Petition	Unknown	9-334
Pelham	Christopher	Email	10/13/2021	9-291
Pelkey	Melissa	Email	08/10/21	9-291
Pell	Roy	Email	08/11/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Peloquen	James	Email	10/13/21	9-291
Peluso	Joseph_Pauline	Letter	08/19/21	3-1
Peluso	Pauline & Joseph	Email	09/30/21	4-94, 4-2
Pena	Kenya	Email	10/13/21	9-291
Pence	Maria	Email	08/03/21	9-291
Penfield	Aric	Email	09/24/21	4-2
Penfield	Aric	Email	09/24/21	6-9, 6-88, 6-88, 6-5, 4-92, 4-2, 3-1
Penix	L	Postcard	Unknown	7-142, 7-131, 4-54
Pennington	Clark	Petition	Unknown	9-334
Pennington	Jenny	Petition	Unknown	9-334
Pennis	Venos	Petition	Unknown	9-334
Percival	Pamela	Postcard	Unknown	7-9, 7-141, 7-133
Perez	Bianca	Email	08/19/21	9-291
Perez	Rosemary	Email	08/10/21	9-291
Perez	Timothy	Online Form	10/11/21	5-10
Perlmutter	Martha D.	Email	08/10/21	9-291
Perrini-Bowers	Marci	Petition	Unknown	9-334
Perrotti	Monica	Email	10/13/21	9-291
Perry	Deloris	Postcard	Unknown	7-84, 4-67, 4-54
Perry	Dolores	Petition	Unknown	9-334
Perry	Pamella	Postcard	Unknown	7-89, 7-6, 7-149
Perry	Ryan	Online Form	10/14/21	4-47
Perry	Timothy C.	Postcard	Unknown	9-264, 7-133
Perry	Wanda R.	Petition	Unknown	9-334
Persse	Kim Davis	Email	08/24/21	6-9
Peters	Bob	Email	10/02/21	6-5, 6-3, 6-1, 5-23, 5-17, 4-2
Peters	Haley	Email	10/13/21	9-291
Peters	Joan	Email	10/11/21	3-1
Peters	Joan	Voicemail	10/11/21	3-1
Peters	Robert	Online Form	08/16/21	4-2
Peterson	Jamal	Petition	Unknown	9-334
Petrilli	John	Online Form	09/08/21	6-5
Petrillo	Megan	Email	10/15/21	9-291
Petrov	Anthony	Online Form	07/16/21	3-1
Petteway	Shaquana	Postcard	Unknown	7-27, 7-27, 7-133
Pettis	William	Petition	Unknown	9-334
Peux	Timothy C	Postcard	Unknown	9-264, 7-32, 7-133
Peveny	Alisha	Petition	Unknown	9-334
Peyton	Alexandra	Online Form	10/14/21	4-1
Pham	Trang	Petition	Unknown	9-334
Phelan	Jennifer	Postcard	Unknown	7-142
Phelan	Thomas	Petition	Unknown	9-334
Phelps	Leslie	Email	08/10/21	9-291
Phifer	Deborah	Postcard	Unknown	7-27, 7-131, 7-131
Phillips	Casey	Email	08/10/21	9-291
Phillips	Diane E	Email	10/13/21	9-291
Phillips	Gillian	Email	08/10/21	9-291
Phillips	Maura	Email	08/10/21	9-291
Phin	Marian	Postcard	Unknown	7-32, 7-141, 7-131
Phipps	Jackie	Petition	Unknown	9-334
Piagentini	Alex	Petition	Unknown	9-334
Picard	Susan	Email	08/10/21	9-291
Piccolo	Daniel	Email	10/13/21	9-291
Pick	Amy	Email	08/10/21	9-291
Pickett	LaToya	Petition	Unknown	9-334
Pickman	Sarah	Email	08/11/21	9-291
Pierce	Ruthie M.	Petition	Unknown	9-334
Pierce-el	Charles	Oral	09/09/21	7-9, 7-17, 6-45, 4-55, 3-2
Pierce-El	Charles	Postcard	Unknown	7-32, 7-131, 4-141
Pierce-El	Charles	Postcard	Unknown	7-9, 7-27, 7-131

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Pierce-El	Charlie	Petition	Unknown	9-334
Pierce-El	Charlie	Petition	Unknown	9-334
Pierson	Carolyn C.	Email	08/11/21	9-291
Pietrafesa	Dick	Online Form	09/14/21	4-2
Pietrafesa	Rich	Online Form	09/22/21	4-2
Pietrafesa	Richard	Online Form	09/03/21	5-17, 4-2, 3-1
Pietrafesa Jr	Rich	Online Form	09/08/21	5-10
Pietrzak	Ted	Written Form	09/08/21	7-93
Pihlgren	Richard	Email	08/10/21	9-291
Pillinger	Hal	Email	08/10/21	9-291
Pimentel	Kimberly	Postcard	Unknown	7-6, 7-149, 4-104, 7-21
Pine	Joslyn	Email	08/10/21	9-291
Pinet	Tealye	Petition	Unknown	9-334
Pinet	Tealye	Postcard	Unknown	7-133
Pinkson	Larry	Petition	Unknown	9-334
Piraino	Joseph	Online Form	07/23/21	4-1
Piscitello	Darryl	Email	10/15/21	5-21
Piston	Daniel	Online Form	10/13/21	4-1
Pitts	Anthony	Petition	Unknown	9-334
Pitts	Anthony	Petition	Unknown	9-334
Pitts	Benjamin	Petition	Unknown	9-334
Pitts	Camesha	Petition	Unknown	9-334
Pitts	Mindy	Postcard	Unknown	7-9, 7-32, 7-129
Pius	Matthew	Email	08/10/21	9-291
Pixley	Susan	Email	08/10/21	9-291
Plotkin	Jonathan	Email	08/10/21	9-291
Podkowsinski	Dave	Oral	08/18/21	4-3
Pohle	Brooke	Petition	Unknown	9-334
Poindexter	Louise	Petition	Unknown	9-334
Polachek	Nancy	Email	10/13/21	4-2
Polifroni	Mea	Postcard	Unknown	7-6, 7-32, 7-131
Polikarpenko	Peter	Email	10/13/21	9-291
Polikarpenko	Peter	Postcard	Unknown	7-84, 4-67, 4-54
Pollard	Merritt	Petition	Unknown	9-334
Pollard	William L.	Petition	Unknown	9-334
Pomeroy	Kim	Online Form	08/09/21	4-2, 4-1
Pope	Bessie	Petition	Unknown	9-334
Pope	Janice	Postcard	Unknown	7-6, 7-148, 7-138, 7-1
Porandes	Khari	Petition	Unknown	9-334
Porch	Wallace	Postcard	Unknown	7-89, 7-149, 7-133, 7-1
Porter	Catherine	Petition	Unknown	9-334
Posner	Amy	Email	08/19/21	9-291
Posner	Jessica	Email	10/14/21	9-291
Potter	Walter	Postcard	Unknown	7-27, 7-27, 7-148
Poulette	James	Email	09/03/21	9-291
Povelko	Eva	Email	10/13/21	9-291
Powell	Charlie M.	Petition	Unknown	9-334
Powell	Diamond	Postcard	Unknown	7-1, 7-89, 7-141
Powell	Janet	Petition	Unknown	9-334
Powell	Janet	Postcard	Unknown	7-141, 7-138, 7-131
Powell	Janet	Postcard	Unknown	7-131, 7-129
Powell	Rickie	Petition	Unknown	9-334
Powell	Shyla	Email	08/05/21	9-291
Powell	Zack	Postcard	Unknown	7-149, 7-138, 4-46
Powers	Bennett	Online Form	10/14/21	4-1
Powers	David	Online Form	08/10/21	8-12, 8-1, 5-10
Poza	Hernan	Email	10/13/21	9-291
Pozzolini	Vickie	Email	08/10/21	9-291
Pralle	Sarah	Postcard	Unknown	7-84, 7-6, 7-148
Prater	Gloria	Petition	Unknown	9-334
Prater	Grace R.	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Praus	Diana	Email	08/10/21	9-291
Price	Cecelia	Email	10/13/21	9-291
Price	Kerry	Email	08/10/21	9-291
Price	Nelson	Postcard	Unknown	7-84, 4-67, 4-54
Price	Ruby	Postcard	Unknown	7-89, 7-6, 7-149
Prickett	Jeannie	Postcard	Unknown	7-9, 7-6, 7-142
Primer	Alicia	Online Form	10/13/21	4-47
Printup	Leonard	Postcard	Unknown	4-141, 7-84, 7-133
Printz	Emma	Email	10/13/21	9-291
Pristash	Jerome	Online Form	09/01/21	4-2
Prittler		Postcard	Unknown	7-141, 7-131, 4-54
Procks	Jasmin	Postcard	Unknown	7-4, 7-32, 7-27
Proemm	Klaus	Email	08/10/21	9-291
Projansky	Camala	Email	08/19/21	9-291
Pryor	Michael	Email	08/10/21	9-291
Przepiora	John	Online Form	10/14/21	5-22, 4-61, 4-3, 4-1
Przepiora	John	Petition	Unknown	9-334
Publiee	Jean	Letter	07/16/21	7-116
Pucharski	Richard	Petition	Unknown	9-334
Purcell	Jill	Email	08/10/21	9-291
Puscheck	Maura	Email	08/19/21	9-291
Pusey	Tana	Postcard	Unknown	9-264, 7-84, 7-6
Putnam	Nancy	Petition	Unknown	9-334
Pyne	Steven	Postcard	Unknown	7-133
Pyramid Management Group, LLC & Destiny USA		Letter	10/14/21	9-337 through 9-370
Qayum	Seemin	Email	08/19/21	9-291
Qazi	Hassaan	Email	08/10/21	9-291
Quantz	Julia	Online Form	10/14/21	4-1
Quasha	George	Email	08/11/21	9-291
Quiles	Christian	Petition	Unknown	9-334
Quiles	Janice	Petition	Unknown	9-334
Quillin	Kimberly	Email	10/13/21	9-291
Quinn	Christine	Petition	Unknown	9-334
Quinn	EdytheAnn	Email	10/13/21	9-291
Quinn	Kevin	Email	07/16/21	6-3
Quinn	Madison	Email	08/18/21	9-291
Quinn	Madison	Postcard	Unknown	7-9, 7-129, 7-133, 7-138
Quinn	Madison	Postcard	Unknown	7-27, 7-148, 7-131, 7-21
Quirk	Joseph	Email	08/12/21	9-291
Quirk	Maureen	Petition	Unknown	9-334
Quoss	Jamie & Brian	Email	10/14/21	4-1
R	Lance	Online Form	08/17/21	3-1
R----	Simona	Petition	Unknown	9-334
R-----	M-----	Petition	Unknown	9-334
R-----	Robert	Petition	Unknown	9-334
Raacha	Adan	Postcard	Unknown	7-84, 7-27, 4-104
Rabe	Cassandra	Email	08/10/21	9-291
Rabinowitz	Rabbi Charles P	Email	10/13/21	9-291
Rabrinson	Alyina	Postcard	Unknown	7-141, 4-54, 4-46
Race	Amos	Online Form	07/16/21	4-1
Race	Donald	Postcard	Unknown	7-9, 7-89, 7-27
Race	Kevin	Online Form	08/03/21	4-47
Racoosin	Esther	Email	08/10/21	9-291
Radley	Bret	Postcard	Unknown	7-32, 7-142, 7-131
Radley	Kathy	Postcard	Unknown	7-32, 7-131
Radley	Tyler	Postcard	Unknown	7-9, 7-6, 7-32
Rahman	Ali A.	Petition	Unknown	9-334
Rahman	Ali Abdur	Postcard	Unknown	7-27, 7-142, 7-131
Rahman	Ali Abdur	Postcard	Unknown	7-21, 7-32, 7-89, 7-141
Rajput	Sahar	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Rakow	Daniel	Petition	Unknown	9-334
Rakshys	Clare	Email	08/10/21	9-291
Ramanatha	Kadar	Petition	Unknown	9-334
Ramazes	Murjani	Petition	Unknown	9-334
Ramdath	Aunjonaya	Petition	Unknown	9-334
Ramis	Maria	Petition	Unknown	9-334
Ramos	Joshua	Email	10/13/21	9-291
Ramsden	JH	Petition	Unknown	9-334
Ranauro	David	Online Form	09/18/21	6-9
Rance	Curtis	Petition	Unknown	9-334
Randall	Lisa	Email	10/14/21	9-291
Rangne	Monica	Email	08/10/21	9-291
Rankin	Annie	Petition	Unknown	9-334
Rankins	Annie	Petition	Unknown	9-334
Rankins	Annie M.	Postcard	Unknown	9-253 through 9-257
Rapholz	Michael	Petition	Unknown	9-334
Raposo	Cesar	Email	08/10/21	9-291
Rappaport	Jonah	Petition	Unknown	9-334
Rashid	Ade	Postcard	Unknown	7-133, 7-131, 7-129, 8-6, 8-8
Rasulo	Ibrahim	Postcard	Unknown	7-133, 7-131, 7-131
Ratliff	Sean	Petition	Unknown	9-334
Raulli	Mark	Online Form	10/08/21	5-18, 5-10
Raup-Kounovsky	Pamela	Email	08/10/21	9-291
Rauscher	Rebecca	Email	10/13/21	9-291
Rauscher	Shirley	Email	10/13/21	9-291
Rautio	Ilse A.	Petition	Unknown	9-334
Rautio	Sabrina	Petition	Unknown	9-334
Rawlins	Elsie	Email	08/10/21	9-291
Raybeck	Nathan	Oral	08/17/21	8-12, 8-1, 5-13, 4-55, 4-46, 4-4, 4-1
Raybeck	Sunju	Email	08/12/21	9-291
Raybeck	Sunju	Online Form	10/14/21	4-55, 4-1
Raybeck	Sunju	Postcard	Unknown	4-1, 7-89, 7-141
Raymond	Alice	Email	08/10/21	9-291
Raymond	Dennis	Online Form	09/13/21	5-3
Raymond	Timothy	Email	08/10/21	9-291
Rcbana	Brenda	Postcard	Unknown	7-27, 7-131, 7-129
Reaves	Carl	Petition	Unknown	9-334
Reaves	Phyllis	Postcard	Unknown	4-67, 4-46, 4-104
Reaves	Roy	Petition	Unknown	9-334
Recht	Kerry	Email	08/10/21	9-291
Reckess	Sarah	Email	10/13/21	9-291
Reddick	James	Postcard	Unknown	7-6, 7-141, 4-67
Reddick	Jamie	Petition	Unknown	9-334
Reed	Clenn	Email	10/13/21	9-291
Reed	Dawn Evette	Postcard	Unknown	7-9, 7-6, 7-131
Reed	K. Daniel	Postcard	Unknown	7-84, 7-133, 4-54
Reed	Michael W.	Email	09/01/21	5-10, 4-2
Reed	Travis	Petition	Unknown	9-334
Reeder	Darryl	Petition	Unknown	9-334
Rees	Mercedes	Postcard	Unknown	4-67, 4-46, 4-104
Reese	Ardie	Petition	Unknown	9-334
Reese	Leyonna	Petition	Unknown	9-334
Reese	Mildred	Petition	Unknown	9-334
Reese	Tammy	Postcard	Unknown	7-9, 7-133, 7-129
Reeves	Joyce	Email	08/10/21	9-291
Refes	N	Email	10/13/21	9-291
Regan	Edward	Email	08/10/21	9-291
Regan	Geraldine	Petition	Unknown	9-334
Regan	Gerri	Postcard	Unknown	7-133
Regan	Jim	Postcard	Unknown	7-133
Regitano	Jessica	Online Form	10/12/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Regner	Jade	Postcard	Unknown	7-6, 7-32, 7-149
Reid	Ajaya	Petition	Unknown	9-334
Reid	Jocelyn	Petition	Unknown	9-334
Reid, Sr.	Todd R.	Postcard	Unknown	9-253 through 9-257
Reinhardt	Jill	Email	08/10/21	9-291
Reisinger	Mark	Email	08/10/21	9-291
Rejman	Colleen	Online Form	10/14/21	7-62, 5-10
Rejman	Fred	Online Form	10/14/21	4-2
Rekeweg	Jordan	Email	10/14/21	9-291
Releford	Ranette	Postcard	Unknown	7-9, 7-142, 7-131
Releford	Ranette	Postcard	Unknown	7-6, 7-4, 7-27
Rengers	Edward	Email	08/10/21	9-291
Reparations	Cf	Email	10/13/21	9-291
Republican Caucus of Onondaga Co. Legislature		Letter	10/13/21	5-10, 4-2
Resch	Kathy	Postcard	Unknown	7-138, 7-133, 4-104
Resnick	Carole	Email	10/14/21	9-291
Reynolds	Ann	Petition	Unknown	9-334
Reynolds	Daniel	Postcard	Unknown	7-9, 7-149, 7-148, 4-1
Reynolds	John	Email	08/10/21	9-291
Reynolds	Sharon A.	Petition	Unknown	9-334
Reynoso	Jordan	Petition	Unknown	9-334
Rezak	Louis	Online Form	08/08/21	4-47
Rezelle	Jackie	Postcard	Unknown	7-9, 7-32, 7-129
Rhoads	Tom	Email	09/14/21	6-9
Rhode	Christina	Email	08/10/21	9-291
Rhodes	Nancy Keefe	Online Form	08/05/21	4-46
Rice	Carlene	Postcard	Unknown	7-6, 7-32, 6-3
Rice	Carolyn	Petition	Unknown	9-334
Rice	Doris V.	Petition	Unknown	9-334
Rice	Doris V.	Petition	Unknown	9-334
Rice	Jacqueline	Petition	Unknown	9-334
Rice	Kitty	Petition	Unknown	9-334
Rice	Lorenzo	Postcard	Unknown	7-131, 7-129, 7-129, 7-138
Rice	Marni	Email	08/10/21	9-291
Rice	Richard	Petition	Unknown	9-334
Rice	Tim	Petition	Unknown	9-334
Ricelli	Richard	Written Form	08/18/21	8-1, 3-1
Rich	Helen	Email	08/12/21	9-291
Rich	Philip	Email	08/10/21	9-291
Richard	James	Postcard	Unknown	7-148, 7-133, 4-67
Richards	David	Email	10/13/21	9-291
Richards	Jocelyn	Email	08/11/21	9-291
Richards	Lauren	Petition	Unknown	9-334
Richards	Tamairah	Petition	Unknown	9-334
Richardson	Glenn	Email	10/13/21	9-291
Richardson	James	Online Form	09/09/21	5-18
Richardson	Royalty	Oral	09/09/21	6-7
Richmond	Eric	Petition	Unknown	9-334
Richmond	Kyle	Petition	Unknown	9-334
Riddick	Laquale	Postcard	Unknown	7-133
Riddick	Pearl	Petition	Unknown	9-334
Riddick Holmes	Carol	Postcard	Unknown	7-6, 7-32, 4-67, 7-129, 7-138
Riell	Dana	Email	08/10/21	9-291
Rifai-Bashjawish	Hoda	Postcard	Unknown	7-6, 7-27, 7-27
Rifkind	Nancy	Email	08/10/21	9-291
Rigney	Kerin	Postcard	Unknown	7-27, 7-129, 4-54, 4-1
Riley	Danajah	Postcard	Unknown	7-84, 7-141, 7-133
Riley	Danajah	Postcard	Unknown	7-32, 7-27, 4-104
Ring	Barbara	Email	10/13/21	9-291
Rinne	Joel	Postcard	Unknown	7-4, 7-32, 7-131, 8-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Rioux	Bob	Online Form	07/20/21	8-3, 3-1
Ripley	Olivia	Postcard	Unknown	7-6, 7-27, 7-27
Ripp	Rudolph	Email	10/13/21	9-291
Ritchie	Ida M.	Petition	Unknown	9-334
Ritchie-Robinson	Caleb W.	Petition	Unknown	9-334
Rittman	Trevor	Online Form	10/14/21	4-1
Rivera	Angelina	Email	08/10/21	9-136, 4-2
Rivera	Ashley	Postcard	Unknown	9-253 through 9-257
Rivers	Jerry	Email	08/10/21	9-291
Rivers	Shameke	Postcard	Unknown	7-6, 7-9
Rivers	Vannia	Petition	Unknown	9-334
Rizzo	Christine M.	Petition	Unknown	9-334
Roasda	Eddie	Petition	Unknown	9-334
Robbins	Glenn	Online Form	09/06/21	4-1
Roberson	William	Email	08/10/21	9-291
Roberts	Craige	Email	08/10/21	9-291
Roberts	Debora	Online Form	07/20/21	6-11, 4-55
Roberts	Jennise	Postcard	Unknown	7-27, 7-27, 7-142
Roberts	Kathleen	Email	10/13/21	9-291
Roberts	Ladashé	Petition	Unknown	9-334
Roberts	Suzanne	Online Form	08/09/21	3-1
Robertson	Dave	Postcard	Unknown	7-133
Robfe	Gio	Petition	Unknown	9-334
Robideau	Erin	Online Form	10/14/21	4-61, 4-1
Robin	Carol	Email	08/10/21	9-291
Robinson	Alvina	Postcard	Unknown	7-141, 4-54, 4-46
Robinson	Ben	Petition	Unknown	9-334
Robinson	Clarence	Petition	Unknown	9-334
Robinson	Don	Postcard	Unknown	7-148, 6-3, 4-67
Robinson	Jonnell	Postcard	Unknown	9-264, 7-6, 7-141
Robinson	Raquan	Postcard	Unknown	7-133, 7-139
Robinson	Raymond	Postcard	Unknown	7-32, 7-27, 7-27
Robinson	Tamika	Petition	Unknown	9-334
Robinson	Terence	Petition	Unknown	9-334
Robinson	Thalia	Petition	Unknown	9-334
Robinson	Winnie	Petition	Unknown	9-334
Robinson	Zack	Petition	Unknown	9-334
Robison	Suzanne	Online Form	07/16/21	4-2
Robles	Daisy	Email	08/11/21	9-135, 9-133, 7-52
Rockhill	Conor	Online Form	10/14/21	7-9, 4-1
Rodack	Soretta	Email	08/11/21	9-291
Rodgers	Jenna	Email	08/11/21	9-291
Rodriguez	Justin	Email	08/11/21	9-291
Rodriguez	Marion	Petition	Unknown	9-334
Rodriguez	Sephon	Petition	Unknown	9-334
Rogatz	Marge & Peter	Email	08/10/21	9-291
Rogers	Clara	Postcard	Unknown	7-89, 7-141, 4-54
Rogers	Jana	Postcard	Unknown	7-84, 7-148, 6-3
Rogers	Kyle	Online Form	10/13/21	4-1
Rohadsox	Kim	Petition	Unknown	9-334
Rohde	John	Email	10/13/21	9-291
Rohe	John	Email	10/13/21	9-291
Rojas	Valencia	Petition	Unknown	9-334
Rolling	Meshae	Online Form	10/14/21	7-133
Roloff	Ellyn	Oral	08/17/21	7-9, 7-6, 7-32, 7-133, 7-129, 7-114, 4-55
Roloff	Ellyn	Email	08/04/21	9-291
Romano	John	Email	07/29/21	8-5, 4-15
Romano	John	Email	07/29/21	4-15
Romer	Evan	Email	08/10/21	9-291
Root	Barb	Petition	Unknown	9-334
Root	Barbara	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Rosa	Anais	Petition	Unknown	9-334
Rosado	Xuxa	Email	10/13/21	9-291
Rosano	Annemarie	Email	10/18/21	9-291
Rosario	Steven	Petition	Unknown	9-334
Rose	Deborah	Petition	Unknown	9-334
Rose	Deborah	Postcard	Unknown	7-6, 7-148, 7-148
Rose	Deborah	Postcard	Unknown	7-84, 7-133, 4-54, 5-13, 7-21
Rose	Deborah	Postcard	Unknown	4-55, 7-21, 7-27
Rose	Deirdre	Email	10/13/21	9-291
Rose	Vanessa	Petition	Unknown	9-334
Rosen	Barbara	Email	10/13/21	9-291
Rosen	Barry	Email	08/10/21	9-291
Rosen	Bruce	Email	08/19/21	9-291
Rosen	Mike	Email	08/11/21	9-291
Rosenberg	Noah	Petition	Unknown	9-334
Rosenblum	Sheldon	Email	08/10/21	9-291
Rosenfield	William	Email	08/11/21	9-291
Rosengard	Robert	Email	10/13/21	9-291
Rosenow	Paul	Online Form	09/05/21	4-41
Rosenthal	Bill	Email	08/10/21	9-291
Rosenthal	Rhonda	Email	08/11/21	9-291
Rosner	Beth	Email	08/10/21	9-291
Ross	Amanda	Petition	Unknown	9-334
Ross	Cheryl	Postcard	Unknown	7-133, 7-131, 4-54
Ross	Donna	Postcard	Unknown	7-32, 7-149, 7-133
Ross	Ellen	Email	08/10/21	9-291
Ross	Kristoffer	Email	10/13/21	9-291
Ross	Melissa	Email	10/12/21	9-291
Ross	Misse	Postcard	Unknown	7-9, 7-32, 7-141
Ross	Rebecca	Petition	Unknown	9-334
Ross	Melissa	Online Form	07/17/21	4-55
Rossen	Bridget	Email	07/27/21	6-3
Rossler	Cody	Email	08/10/21	9-291
Rotella	Maria	Petition	Unknown	9-334
Rotondo	Mark	Online Form	10/14/21	4-1
Rotunda	Robert	Email	08/10/21	9-291
Rouse	Edrick	Postcard	Unknown	7-133
Rouse	Lavasra	Petition	Unknown	9-334
Rouse	Patricia	Petition	Unknown	9-334
Rouse	Willie	Postcard	Unknown	7-133
Rowe	Derick	Postcard	Unknown	7-133
Rowell	Cynthia	Petition	Unknown	9-334
Rowser	Sam	Postcard	Unknown	7-9, 7-27, 7-131
Rowser	Shirley	Petition	Unknown	9-334
Rowser	Shirley	Postcard	Unknown	7-27, 7-141, 7-138
Rowser	Shirley	Postcard	Unknown	7-149, 4-67, 4-104
Roy	Stacey	Email	08/04/21	9-291
Royal	Kathy	Petition	Unknown	9-334
Royal	Martha	Petition	Unknown	9-334
Roylana	Patrice	Petition	Unknown	9-334
Rozansky	Stacy	Email	08/10/21	9-291
Rozelle	Jackie	Postcard	Unknown	7-9, 7-32, 7-129
Rozelle	Markell	Petition	Unknown	9-334
Rozum	Ursula	Postcard	Unknown	7-21, 7-129
Rubin	Judith	Email	10/13/21	9-291
Rubin	Laurie	Email	08/10/21	9-291
Rubin	Rochelle	Email	08/10/21	9-291
Ruddy	Chris	Email	08/16/21	4-34, 4-27, 4-26, 4-124
Rudolph	Aishah	Postcard	Unknown	7-27, 7-27, 7-142, 7-21
Ruffin	Star	Postcard	Unknown	7-4, 7-131, 7-129
Rufus	Allen	Written Form	09/09/21	7-4

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Rufus	David	Written Form	09/09/21	7-4
Runge, M.D.	Ellen	Online Form	08/17/21	4-1
Rupert	Anna	Online Form	10/13/21	4-1
Rush	Portia	Petition	Unknown	9-334
Rush	TC	Petition	Unknown	9-334
Rush	Virginia	Petition	Unknown	9-334
Rushing, III	John	Postcard	Unknown	7-9, 7-27
Russell	Amanda	Oral	09/23/21	6-1, 4-64, 4-102, 4-1
Russell	Caroline	Email	08/18/21	9-291
Russell	Doug	Email	08/10/21	9-291
Russell	Lindsey	Email	10/12/21	9-291
Russell	TC	Petition	Unknown	9-334
Russell-Lowe	Bryan	Petition	Unknown	9-334
Russo	Charles	Email	08/19/21	7-32, 7-133, 4-71
Russo	Charles	Letter	09/09/21	7-138, 7-133, 4-70
Russo	Linda	Email	08/10/21	9-291
Russo	Maria	Email	10/13/21	9-291
Ruther	Amber	Email	10/14/21	9-291
Ryan	Catherine	Email	08/09/21	9-291
Ryan	Clifford	Postcard	Unknown	7-9, 7-142, 4-54
Ryan	Colleen	Petition	Unknown	9-334
Ryan	Diana	Email	10/13/21	7-133, 6-3, 4-72, 4-71, 4-55, 4-49, 4-4, 4-15, 4-141, 4-104, 4-1
Ryan	Diana	Email	10/13/21	4-71
Ryan	Diana	Email	10/13/21	4-55
Ryan	Diana	Email	10/13/21	4-104
Ryan	Diana	Email	10/13/21	4-4
Ryan	Diana	Email	10/13/21	4-49
Ryan	Diana	Email	10/13/21	7-133
Ryan	Diana	Email	10/13/21	4-15
Ryan	Diana	Email	10/13/21	4-72
Ryan	Diana	Email	10/13/21	4-141
Ryan	Diana	Voicemail	10/13/21	4-1
Ryan	Jennifer	Email	09/04/21	6-3
Ryan	Jessica	Email	10/13/21	9-291
Ryan	Megan	Email	08/10/21	9-291
Ryan	Michael	Email	10/13/21	7-133, 4-72, 4-71, 4-55, 4-49, 4-4, 4-15, 4-141, 4-104, 4-1
Ryan	Ronald	Petition	Unknown	9-334
Ryan	Vincent	Online Form	10/14/21	4-61, 4-1
Ryans	Tamera	Petition	Unknown	9-334
S	Denise	Email	10/14/21	9-291
S	Jim	Online Form	08/16/21	4-2, 3-1
S	Ryan	Online Form	10/13/21	4-1
S.	D.	Written Form	09/09/21	7-4
S.	Eric	Email	08/10/21	9-291
S.	Tatiana	Postcard	Unknown	7-6, 7-32, 7-27, 7-131
Sacks	Ariel	Email	08/08/21	9-291
Sacks	Ariel	Email	08/08/21	9-291
Saddler	Mary	Postcard	Unknown	7-4, 7-27, 7-142
Sadeght	Campbell	Online Form	10/13/21	5-17
Saffoury	Agnes C.	Email	08/19/21	9-291
Safranko	Krista	Online Form	08/11/21	6-5
Sage	Gloria	Online Form	09/13/21	6-4, 6-36, 6-21, 6-15, 6-1, 4-70, 4-58, 4-56, 4-2
Sage	Gloria	Oral	08/17/21	6-34
Saidel	Louis	Oral	09/23/21	4-102
Sailer	Jacqueline	Email	08/10/21	9-291
Saiz	Laurel	Postcard	Unknown	7-27, 7-149, 7-142
Saka	Lisa	Postcard	Unknown	7-27, 7-148, 7-142, 7-129
Saka	Lisa	Written Form	08/18/21	7-133, 7-129

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Saka	Lisa	Written Form	08/18/21	7-129
Saka	Lisa C.	Petition	Unknown	9-334
Saka	Meryem	Postcard	Unknown	7-89, 7-6, 7-133
Salamone	Candice	Email	08/11/21	9-136, 9-135, 9-133, 7-52, 4-2
Salazar-Naveros	Alejandrina	Email	08/11/21	9-135, 9-133, 7-52
Saleh	Florence	Email	10/16/21	4-55, 4-1
Salm	Lura	Email	08/10/21	9-291
Salmanson	Carol	Email	08/10/21	9-291
Salomon-Lee	Chantal	Email	08/11/21	9-291
Samaha	Jasmine	Email	08/10/21	9-291
Sampson	Alden	Online Form	10/14/21	4-1
Sampson	Brian	Oral	08/17/21	7-133, 4-1
Samson	Nordy	Postcard	Unknown	9-253 through 9-257
Samson	Wordy	Postcard	Unknown	7-6, 7-131, 7-129
Samuels	Amy	Petition	Unknown	9-334
Samuels	Dejahra	Postcard	Unknown	7-133
Samuels	Richard	Postcard	Unknown	7-133
Sanchez	Rosa	Postcard	Unknown	7-32, 7-27, 7-131
Sanders	Chris	Petition	Unknown	9-334
Sanders	Emily K.	Postcard	Unknown	7-84, 7-27, 7-148
Sanderson	Laurie	Petition	Unknown	9-334
Sandgrund	Robert	Email	08/10/21	9-291
Sands	Theresa	Postcard	Unknown	7-9, 7-27, 7-142
Sanford	William	Oral	08/17/21	8-8, 8-3, 7-84, 7-5, 5-10
Sannicandro	Joseph	Email	08/10/21	9-291
Santangelo	Sally	Postcard	Unknown	7-27, 7-27, 7-131
Santiago	Eric	Postcard	Unknown	7-133
Santiago	Wilfredo	Email	08/10/21	9-291
Santilla	Susan	Email	10/13/21	9-291
Santos	Chelsea	Email	08/11/21	9-136, 4-2
Santos	Chelsea	Email	08/11/21	9-135, 9-133, 7-52
Santos	Chelsea	Online Form	08/17/21	7-52
Sarabasha	Susan	Email	08/10/21	9-291
Sarason	Robert	Email	08/04/21	9-291
Sarason	Robert	Email	10/14/21	7-133
Sareceno	Anthony	Voicemail	09/04/21	7-3
Sarno	Joseph	Letter	10/14/21	7-64, 6-9, 6-3, 5-17, 4-2, 2-2
Sarno	Samantha	Petition	Unknown	9-334
Sarvar	Peter	Oral	08/17/21	8-12, 8-1, 7-28, 7-133
Saryer	Peter	Petition	Unknown	9-334
Satcher-Jackson	Donna	Petition	Unknown	9-334
Sattar	Sophia	Email	08/10/21	9-291
Satterfield	Dustin	Email	08/10/21	9-291
Satzman	Sarah	Email	08/10/21	9-291
Saucier III	Murray	Online Form	07/16/21	5-13, 4-22
Sauer	Ellyn	Online Form	09/08/21	5-10
Saunders	Jeanie	Written Form	09/09/21	7-4
Saunders	Marissa	Petition	Unknown	9-334
Saunders	Marissa	Postcard	Unknown	7-4, 7-32, 7-142
Saunders	Marissa	Postcard	Unknown	7-9, 7-27, 7-131
Sauve	Christina	Email	08/03/21	9-291
Savanne	Monica	Petition	Unknown	9-334
Savino	Gabriella	Email	08/02/21	9-291
Saxton	Carolyn	Petition	Unknown	9-334
Sayavong	Eliot	Petition	Unknown	9-334
Sayler	Susannah	Postcard	Unknown	4-104, 4-125, 7-77
Sayre	David	Postcard	Unknown	4-125, 7-9, 7-21, 7-129
Scanes	Sharina	Email	08/24/21	9-291
Scanes	Sharina	Online Form	08/24/21	9-291
Scanlon	Karen	Email	08/19/21	9-291
Scanlon	Patricia	Postcard	Unknown	7-9, 7-27, 7-131

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Scaravilli	Roberto	Email	08/10/21	9-291
Schaefer	Dolores	Email	08/11/21	9-291
Schaefer	George	Petition	Unknown	9-334
Schaefer	Gretchen	Online Form	08/17/21	4-55
Schaefer	Gretchen	Postcard	Unknown	7-131, 4-55, 7-27, 7-133
Schaefer	Millie	Email	10/14/21	9-291
Schaem	Suzanne	Email	08/10/21	9-291
Scharborough	Paula	Petition	Unknown	9-334
Schechter	Ellen	Email	08/10/21	9-291
Scheck	Nancy	Email	08/10/21	9-291
Schechter	Ellen	Email	10/13/21	9-291
Scheel	Robin	Online Form	09/01/21	6-3
Scheel		Online Form	08/13/21	4-2
Scheffler	Courtney	Postcard	Unknown	4-4, 7-21, 7-27, 8-6, 8-8
Scheibe	Peter	Email	08/05/21	4-1
Scheiner	Brittany	Email	08/19/21	9-291
Scher	Susan	Email	08/10/21	9-291
Scherer	Lolita	Email	08/10/21	9-291
Scherfner	Bob	Email	10/06/21	5-10
Schiano	Giovanna	Email	10/06/21	4-94
Schickler	Paul	Email	08/10/21	9-291
Schierer	Chris	Online Form	10/14/21	7-144
Schiff	Margie	Email	08/10/21	9-291
Schiffer	Daisy-Mae	Postcard	Unknown	7-9, 7-142, 7-131
Schimelman	Mark	Email	10/14/21	9-291
Schimelman	Shelley	Email	08/10/21	9-291
Schlanger	Craig	Postcard	Unknown	7-6, 7-32, 7-27
Schleicher	Brent	Online Form	10/13/21	4-13
Schmid	Nan	Email	10/13/21	9-291
Schmider	Pauline	Petition	Unknown	9-334
Schmidlein	Jean	Email	08/10/21	9-291
Schmidt	Eric	Postcard	Unknown	7-4, 7-27, 7-27
Schmitthenner	Christine	Email	08/10/21	9-291
Schnell	Nicole	Email	10/13/21	9-291
Schnoop	Debby	Email	08/10/21	9-291
Scholz	Gillian	Email	08/10/21	9-291
Schonfeld	Esther	Email	08/10/21	9-291
Schooler	Julia	Postcard	Unknown	9-264, 7-6, 7-32
Schoonmaker	Georgia	Email	08/12/21	9-291
Schramm	Amy	Email	08/19/21	9-291
Schreiber	Tahlia	Postcard	Unknown	7-6, 7-27, 7-141
Schreyer	Justin	Postcard	Unknown	7-4, 7-27, 7-131
Schrieber	Joan	Voicemail	08/20/21	7-52
Schriner	Sarah	Petition	Unknown	9-334
Schroeder	Heather	Email	10/14/21	4-55, 4-47, 4-46, 4-1
Schroer	Lisa	Postcard	Unknown	7-32, 7-27, 7-138, 4-1
Schubauer	Donald	Online Form	07/20/21	6-5, 5-19, 4-2
Schuddekopf	Hilary	Email	10/13/21	9-291
Schul	James	Online Form	08/19/21	2-1
Schulaner	Jennifer	Email	10/14/21	9-291
Schulman	Jason	Email	10/13/21	9-291
Schulman	Nancy	Email	08/10/21	9-291
Schult	Julia	Online Form	09/07/21	5-19
Schultz	Jennifer	Email	10/16/21	9-291
Schultz	Richard	Petition	Unknown	9-334
Schultzahearn	Melissa	Email	10/13/21	9-291
Schumann	Marcia	Email	08/10/21	9-291
Schuster	Andrew	Online Form	07/19/21	7-9
Schuster	Andrew	Oral	08/17/21	7-9, 4-70, 4-104, 4-1
Schutz	Arlene	Email	10/13/21	9-291
Schwartz	David	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Schwartz	Michael	Email	10/13/21	9-291
Schwartz	Nancy	Email	08/10/21	9-291
Schwartz	Tamar	Email	10/13/21	9-291
Schwartzbach	Sybil	Email	08/10/21	9-291
Schwarz	Daniel	Postcard	Unknown	7-27, 7-142, 7-131
Schwarzlander	Harry	Email	10/13/21	9-291
Schwarzlander	Harry & Patricia	Email	08/10/21	9-291
Schwob	Tim	Email	08/10/21	9-291
Scialabba	Nicole	Petition	Unknown	9-334
Scialabba	Nicole	Petition	Unknown	9-334
Scofield	Toni	Email	08/10/21	9-291
Scoto	Sabrina	Petition	Unknown	9-334
Scott	Diane	Postcard	Unknown	7-6, 7-4, 7-131
Scott	Jaydakis	Postcard	Unknown	7-32, 7-27, 7-142
Scott	Keenan	Petition	Unknown	9-334
Scott	Louise	Postcard	Unknown	7-148, 7-141, 7-133
Scott	Marie	Postcard	Unknown	9-253 through 9-257
Scott	Sheila A.	Petition	Unknown	9-334
Scott	Virgie	Petition	Unknown	9-334
Scrivens	Curtis	Petition	Unknown	9-334
Scrivens	Rachielle	Petition	Unknown	9-334
Scrivens	Rachielle	Petition	Unknown	9-334
Scrivens	Rachielle	Postcard	Unknown	7-27, 7-27, 7-129
Scruggs	Cynthia	Petition	Unknown	9-334
Scruggs	Ira	Petition	Unknown	9-334
Seals	Brian	Petition	Unknown	9-334
Seaman	Domenica	Email	09/28/21	4-94
Searight	Shalondra	Postcard	Unknown	7-6, 7-27, 7-142
Searing	Robert	Online Form	08/03/21	4-47
Searle	John	Email	10/13/21	9-291
Sears	Ismael	Petition	Unknown	9-334
Sears	John	Petition	Unknown	9-334
Seavons	Mary Shick	Petition	Unknown	9-334
Sebesta	Jeanne	Email	08/19/21	9-291
Secora	Jeremy	Oral	08/25/21	7-93, 7-9, 7-7, 7-21
Sedita	Francesca	Email	08/10/21	9-291
Seeley	David	Email	08/13/21	6-61
Seeley	Victoria	Email	08/10/21	9-291
Segler	Reginald	Petition	Unknown	9-334
Seidman	Doug	Email	08/11/21	9-291
Seidman	John	Email	08/10/21	9-291
Seigler	Shahanna	Petition	Unknown	9-334
Selman	Amanda	Email	09/21/21	9-291
Selmon	Alisha	Postcard	Unknown	7-131, 7-129, 7-129
Seltzer	Lawrence	Email	08/10/21	9-291
Semon	Tim	Email	08/10/21	9-291
Semorile	Trina	Email	10/13/21	9-291
Senft	Carolyn	Petition	Unknown	9-334
Senft	Carolyn	Postcard	Unknown	7-6, 7-148, 4-46
Senior	Shelby	Petition	Unknown	9-334
Sesselman	Kathryn	Email	08/10/21	9-291
Sevilla	Ocyntha	Petition	Unknown	9-334
Seward	Derek	Petition	Unknown	9-334
Seymore, Sr.	Brian	Postcard	Unknown	7-27, 7-142, 7-129
Seymour	Henry	Online Form	10/14/21	4-1
Sgambati	Vince	Postcard	Unknown	7-32, 7-138, 7-133
Sgromo	Greg	Letter	10/14/21	5-18, 4-35
Shakir	Abdul Ash	Email	08/10/21	9-291
	Shaheed			
Shakir	Chaplain Abdul	Postcard	Unknown	7-89, 7-131, 4-54
Shakir	Veronica	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Shakir	Veronica	Postcard	Unknown	7-4, 7-131, 7-129
Shakir-Chaplain	Abdul	Petition	Unknown	9-334
Shandorf	Patrick	Online Form	10/13/21	4-1
Shanes	Karinda	Email	07/27/21	7-39
Shannon	Binette	Petition	Unknown	9-334
Shapiro	Linda	Email	10/13/21	9-291
Sharpe	Tim	Petition	Unknown	9-334
Shattell	James	Online Form	10/13/21	4-2
Shaver	N.	Email	09/03/21	4-1
Shaw	Caroline	Email	08/11/21	9-291
Shaw	Maizie	Petition	Unknown	9-334
Shaw	Tai	Postcard	Unknown	7-142, 7-131, 7-129
Shaw	Tanasia	Petition	Unknown	9-334
Sheard	Anthony	Petition	Unknown	9-334
Sheard	Anthony L	Postcard	Unknown	7-133, 7-129, 4-54
Sheard	Anthony L	Postcard	Unknown	9-264, 7-32, 7-138
Shearman	Nicolas	Email	08/10/21	9-291
Sheedy	Charlotte	Email	10/13/21	9-291
Sheelch Nuw	CabdBalan	Postcard	Unknown	7-131, 7-129, 7-9, 7-32
Sheffield	Caroline	Email	08/23/21	9-291
Sheffield	Diane	Email	08/10/21	9-291
Shell	Gene	Petition	Unknown	9-334
Shelton	Gilbert	Postcard	Unknown	7-4, 7-32, 7-142
Shelton	Keller	Postcard	Unknown	4-55, 7-133
Shemi	Avner	Email	08/19/21	9-291
Shenton	Chris	Oral	08/17/21	7-27
Shenton	John	Petition	Unknown	9-334
Shepard	Davonda	Postcard	Unknown	7-9, 7-27, 7-129
Shepard	Nancy	Oral	09/08/21	4-55, 4-47, 4-1
Shepard	Shantel	Petition	Unknown	9-334
Shepard	Tonisha	Postcard	Unknown	7-32, 7-131, 4-54, 7-89, 7-138, 7-141
Shera	Brian	Email	10/14/21	9-291
Sheridan	Joan	Email	10/14/21	9-291
Sheridan	Joan	Postcard	Unknown	7-32, 7-149, 7-142
Sheridan	John	Email	08/08/21	9-291
Sheridan	John	Postcard	Unknown	7-84, 7-133, 4-54, 4-1
Sherman	Dan	Online Form	10/12/21	4-1
Sherwin	Boyce	Email	10/13/21	9-291
Shetty	Rohan	Online Form	09/10/21	8-3
Shields	Cheryl	Petition	Unknown	9-334
Shields	Ida	Oral	09/09/21	8-3, 7-84, 7-27, 4-55
Shiffirin	Joyce	Email	08/10/21	9-291
Shirk	Margaret	Email	08/11/21	9-291
Shirwa	Abdaullahi	Postcard	Unknown	7-27, 7-27, 7-129, 7-6
Shiwraton	Davindranauth	Email	10/13/21	9-291
Shober	Julia	Email	08/10/21	9-291
Short	Tinica	Postcard	Unknown	7-22, 7-32
Shoultz	Bonnie	Email	10/13/21	9-291
Shoultz	Bonnie	Petition	Unknown	9-334
Shoultz	Bonnie	Postcard	Unknown	7-6, 7-32, 7-141, 7-133
Shoultz	Bonnie	Postcard	Unknown	7-6, 7-148, 4-54, 7-1
Shoultz	Bonnie	Postcard	Unknown	7-131, 7-129, 7-129, 7-1
Shoultz	Bonnie	Postcard	Unknown	7-6, 7-141, 4-54, 7-1
Shoup	Drew	Online Form	10/14/21	4-1
Shpirt	Julia	Email	08/10/21	9-291
Shpirt	Marina	Email	08/10/21	9-291
Shuster	Elaine	Email	08/10/21	9-291
Shvarts	Elizabeth	Email	08/10/21	9-291
Shwajlyk	Robert	Email	08/10/21	9-291
Sicchio	Michael	Petition	Unknown	9-334
Sicilia	Sheila S.	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Siegel	Bonita	Email	08/03/21	9-291
Siegel	Bonita	Online Form	10/14/21	7-133, 4-71, 4-1
Siegel	Jaclyn	Email	08/10/21	9-291
Siegelaub	Jay	Email	08/10/21	9-291
Siegele	Nancy	Email	08/10/21	9-291
Siegfried	Will	Email	08/19/21	9-291
Sierra	Julio	Email	10/13/21	9-291
Silbermann	Justine	Postcard	Unknown	7-4, 7-27, 7-27
Siler	Julie	Email	10/14/21	9-291
Silverman	Bernice	Email	08/19/21	9-291
Silverman	Brenda	Email	10/07/21	4-2
Silverman	Brenda	Online Form	08/17/21	7-117, 6-34
Silverman	Seth	Email	08/10/21	9-291
Simas	Connie	Email	08/11/21	9-291
Simchera	Marsha	Email	08/10/21	9-291
Simmonds	Jennifer	Online Form	10/14/21	8-3
Simmons	Bertha	Petition	Unknown	9-334
Simmons	Nikita	Petition	Unknown	9-334
Simmons	Tim	Email	10/15/21	4-1
Simms	Patricia	Postcard	Unknown	7-9, 7-6, 7-27
Simon	Steven	Postcard	Unknown	7-6, 7-32, 7-27
Simon	Steven	Online Form	08/08/21	4-47
Simondson	Amanda	Email	08/19/21	9-291
Simone	Maggie	Postcard	Unknown	7-32, 7-131, 4-54
Simone	Renny	Postcard	Unknown	7-27, 7-131, 7-129
Simons	Eric	Petition	Unknown	9-334
Simonson	Dan	Online Form	10/14/21	4-1
Simpson	Bonnie	Petition	Unknown	9-334
Simpson	D'Andre	Petition	Unknown	9-334
Simpson	Evelyn	Petition	Unknown	9-334
Simpson	Lisa	Petition	Unknown	9-334
Simpson	Mike	Postcard	Unknown	7-89, 7-6, 7-149
Sims	Anita	Petition	Unknown	9-334
Sinatra	Christopher	Postcard	Unknown	4-47, 4-55, 7-133
Sincebaugh	Alison	Postcard	Unknown	7-9, 7-4, 7-142
Singer	Sarah	Email	08/18/21	9-291
Singletary	Jacqueline	Petition	Unknown	9-334
Singleton	Andre	Petition	Unknown	9-334
Singleton	Linda	Email	08/10/21	9-291
Singleton	Nate	Postcard	Unknown	7-141, 7-133, 4-67
Sinko	Robert	Email	10/12/21	7-84, 6-1, 4-4, 4-2, 4-104
Siraj	Bilal	Petition	Unknown	9-334
Sirat	Ahmed	Postcard	Unknown	7-142, 7-133, 4-54
Sircus	Gerald	Email	08/10/21	9-291
Sisti	Alexander	Postcard	Unknown	7-133
Sitnik	Elana	Email	10/15/21	9-291
Sivakumar	Navin	Email	08/11/21	9-291
Skaneateles Watershed Municipality		Letter	08/31/21	6-9
Skidmore	Lucy	Email	10/13/21	9-291
Skinner	Angelo	Petition	Unknown	9-334
Skipworth	Gloria	Postcard	Unknown	7-4, 7-32, 7-27
Skole	Stacey	Email	08/10/21	9-291
Skolnick	Kate	Email	08/11/21	9-291
Skolnick	Katharine	Email	10/13/21	9-291
Slabowski	Jane	Postcard	Unknown	7-131, 4-54, 4-46, 7-21
Slabowski	Jane	Postcard	Unknown	4-55, 4-71, 7-9, 7-84, 7-133
Slass	Pamela	Email	08/10/21	9-291
Slavin	Robert	Email	08/10/21	9-291
Sleight	Vonden	Email	10/09/21	4-2
Slobin	Mark	Email	08/10/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Smalls	Supreena	Oral	09/09/21	7-129, 4-55
Smalls	Supreena	Postcard	Unknown	7-89, 7-6, 7-149
Smalls	Supreena	Postcard	Unknown	4-55, 7-32, 7-84, 7-133
Smalls	Supreena	Written Form	09/09/21	4-55
Smart	Caroline	Email	08/10/21	9-291
Smiley	Joy	Email	10/13/21	9-291
Smith	Alexandria	Online Form	10/13/21	4-1
Smith	Andrew	Email	10/12/21	9-291
Smith	Anthony	Email	10/06/21	7-52, 4-1
Smith	Bruce	Petition	Unknown	9-334
Smith	Carrie	Petition	Unknown	9-334
Smith	D.A.	Postcard	Unknown	7-142, 7-138, 6-3
Smith	Danielle	Email	07/23/21	9-291
Smith	Debra	Online Form	07/19/21	8-8
Smith	Eli	Postcard	Unknown	7-133
Smith	Emily	Email	10/15/21	9-291
Smith	Erin	Postcard	Unknown	7-6, 7-27, 7-142
Smith	Erin	Postcard	Unknown	7-6, 7-27, 7-27
Smith	Horace	Petition	Unknown	9-334
Smith	Kevin G.	Letter	08/31/21	7-107, 6-1
Smith	Kevin G.	Letter	08/31/21	6-1
Smith	Kim	Petition	Unknown	9-334
Smith	Larry	Petition	Unknown	9-334
Smith	Leslye	Email	10/13/21	9-291
Smith	Malcolm	Postcard	Unknown	7-84, 7-32, 7-133
Smith	Marilyn	Postcard	Unknown	7-27, 7-142, 7-131, 4-1
Smith	Marsha	Email	10/13/21	9-291
Smith	Michael	Online Form	08/08/21	4-47
Smith	Mike	Postcard	Unknown	7-133
Smith	Niosha	Postcard	Unknown	7-21
Smith	Norma	Petition	Unknown	9-334
Smith	Robert	Online Form	08/10/21	6-25, 4-1
Smith	Ronnie E.	Petition	Unknown	9-334
Smith	Russell	Email	08/10/21	9-291
Smith	Sandra L.	Postcard	Unknown	7-84, 7-32, 7-133
Smith	Stephanie	Petition	Unknown	9-334
Smith	Sutton	Petition	Unknown	9-334
Smith	Sutton	Petition	Unknown	9-334
Smith	Suzanne	Email	08/10/21	9-291
Smith	Takarra P.	Petition	Unknown	9-334
Smithers	Carolyn	Petition	Unknown	9-334
Smithers	Tamar	Petition	Unknown	9-334
Smith-Putman	Debra	Oral	09/09/21	7-84, 4-55, 4-2
Smith-Raymond	Donna	Email	08/10/21	9-291
Smith-Raymond	Donna	Email	10/13/21	9-291
Smith-Spanier	Karin	Email	10/13/21	9-291
Smock	Amanda	Email	08/19/21	9-291
Snyder	Robert	Email	08/10/21	9-291
Snyder	Susan	Petition	Unknown	9-334
Sobanski	Sandra	Email	08/10/21	9-291
Soden	Laura	Email	10/13/21	9-291
Sokolowski	Dan	Online Form	10/10/21	2-1
Sokolsky	Risa	Email	08/10/21	9-291
Solaia	Shavondra	Petition	Unknown	9-334
Solenberger	Patricia	Oral	09/23/21	4-1
Solicial	Savannah A.	Petition	Unknown	9-334
Solomon	Debra	Petition	Unknown	9-334
Solomon	Doris	Email	08/10/21	9-291
Solomon	Eyeruse	Petition	Unknown	9-334
Solomon	Sheena	Postcard	Unknown	7-6, 7-27, 7-138, 7-133
Solorio	Joseph	Email	10/13/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Somers	Ellen	Online Form	08/08/21	4-47
Sonneborn	Jim & Marcie	Email	08/16/21	4-1
Sorenson	Karen	Email	10/13/21	9-291
Soto	Brendon	Email	08/19/21	9-291
Soto Agosto	Nelson	Postcard	Unknown	7-89, 7-148, 7-133, 7-32
Sours	Terry	Petition	Unknown	9-334
Souva	Sharon	Postcard	Unknown	4-104, 4-125, 7-149
Spadro	Vince	Online Form	09/03/21	4-2
Spaighes	Shamyan	Petition	Unknown	9-334
Spark	Brenda L.	Postcard	Unknown	4-67, 4-46, 4-104
Spear	Amanda	Voicemail	10/14/21	4-1
Spear	Amanda	Voicemail	10/14/21	4-55
Spector	Emma	Petition	Unknown	9-334
Speer	Lindsay	Email	10/14/21	9-291
Speichtz	Gilbert	Postcard	Unknown	7-84, 4-67, 4-54
Spence	Lucy	Online Form	09/26/21	4-1
Spencer	Christine	Email	08/10/21	9-291
Spencer	Jaclyn	Email	08/10/21	9-291
Sperber	Lauren	Email	08/10/21	9-291
Spicer	Sarah	Postcard	Unknown	7-148
Spiegel	Alexa	Email	08/19/21	9-291
Spiegel	Vanessa	Email	08/11/21	9-291
Spilman	Eric	Online Form	07/19/21	6-3
Spirey	Evelyn	Petition	Unknown	9-334
Spivack	Susan	Email	08/10/21	9-291
Spivack	Susan	Email	10/13/21	9-291
Spivey	Evelyn	Postcard	Unknown	7-84, 4-67, 4-54
Spraggins	Rebecca	Petition	Unknown	9-334
Spring	Susanne	Email	10/13/21	9-291
Springenberg	Doug	Postcard	Unknown	7-9, 7-131, 4-67
Sptizner	Nona	Email	08/10/21	9-291
Spugnardi	Jennifer	Email	08/10/21	9-291
Squillace	Cindy	Petition	Unknown	9-334
Stackhouse	Clarissa	Petition	Unknown	9-334
Stackhouse	Jenise	Postcard	Unknown	7-138, 4-54, 4-46
Stackhouse	Larry	Postcard	Unknown	7-141, 7-133, 4-67
Stackhouse	Rasheen	Petition	Unknown	9-334
Stackhouse	Ricky	Petition	Unknown	9-334
Stackhouse	Victoria	Petition	Unknown	9-334
Stacki	Sandra	Email	08/10/21	9-291
Staffod	Mattie	Petition	Unknown	9-334
Stafford	Carolyn	Petition	Unknown	9-334
Stagg	Sonia	Email	10/17/21	9-291
Stagno	Barbara	Email	10/13/21	9-291
Stahl	Martin	Email	08/11/21	9-291
Stairs	Tom	Email	10/08/21	3-1
Stanaslofsky	Pamela	Email	10/13/21	9-291
Standish	Jean	Email	08/10/21	9-291
Stanley	Jemel	Petition	Unknown	9-334
Stanley	Mark	Postcard	Unknown	4-105
Stanley	Rory	Petition	Unknown	9-334
Stanley	Shaniquae	Petition	Unknown	9-334
Stanton	Mike	Oral	08/17/21	8-12, 8-1, 4-71, 4-70, 4-1
Stark	Diane	Email	08/10/21	9-291
Starks	Sharleen	Postcard	Unknown	7-4, 7-32, 7-27
Starling	Frank	Petition	Unknown	9-334
Starling-Davis	Evan	Postcard	Unknown	7-27, 7-27, 7-131
Starnier	Phyllis	Email	08/11/21	9-291
Starr	Karen	Email	08/08/21	9-291
Steding	Matt	Petition	Unknown	9-334
Steele	Bruce	Written Form	08/31/21	4-2

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Steepy	Susan	Email	08/10/21	9-291
Stegmann	G.	Email	07/18/21	6-11, 4-2
Stein	Deborah R.	Postcard	Unknown	7-141, 6-3, 4-104
Stein	Hannah	Email	10/15/21	9-291
Stein	Joel	Email	09/01/21	4-2
Stein	Veronica	Email	08/16/21	9-291
Steiner	Sammy	Petition	Unknown	9-334
Steingraber	Robert	Online Form	10/04/21	5-13, 4-1
Stelter	James	Written Form	08/18/21	6-40, 4-19
Stenson	Taveon	Postcard	Unknown	7-77, 7-133
Stephens	Charlene L.	Postcard	Unknown	7-4, 7-27, 7-129
Stephens	Dolly	Postcard	Unknown	7-4, 7-131, 7-129
Stephens	Kevin	Oral	09/09/21	7-84, 7-21
Stephens	Raheim	Email	10/15/21	4-1
Stephens	Rev. Kevin	Petition	Unknown	9-334
Stephens	Ron	Postcard	Unknown	7-4, 7-131, 7-129
Stephens	Sonja	Postcard	Unknown	7-6, 7-32, 7-142
Stepien	Paul	Online Form	08/23/21	5-24, 5-19, 4-2, 3-1
Stergas	Rob	Email	08/10/21	9-291
Stern	Meredith	Email	08/10/21	9-291
Stern	Richard	Email	10/13/21	9-291
Sterr	Aaron	Email	08/19/21	9-291
Steubing	Beth	Email	08/19/21	9-291
Stevens	Deana D.	Petition	Unknown	9-334
Stevens	Joanne	Petition	Unknown	9-334
Stevens	Joanne	Postcard	Unknown	7-133
Stevens	Marshal	Petition	Unknown	9-334
Stevens	Shandell	Petition	Unknown	9-334
Stevens Reynolds	Sharon	Petition	Unknown	9-334
Stevenson	Johnny	Postcard	Unknown	7-84, 7-131, 4-54
Stevenson	Johnny	Postcard	Unknown	7-131, 4-67, 4-54
Stevenson	Shawna	Postcard	Unknown	7-9, 7-148, 4-67
Steward	Casha	Petition	Unknown	9-334
Steward	JoAnn	Petition	Unknown	9-334
Steward	Vincent	Petition	Unknown	9-334
Stewart	Amy	Postcard	Unknown	4-67, 4-46, 4-104, 4-55
Stewart	Donna	Online Form	07/21/21	4-55
Stewart	Ida	Postcard	Unknown	4-67, 4-46, 4-104
Stewart	J	Email	08/11/21	9-291
Stewart	Jacqueline	Email	10/13/21	9-291
Stewart	James	Online Form	10/11/21	4-1
Stewart	Jules	Petition	Unknown	9-334
Stewart	Lucretia	Email	10/14/21	9-291
Stirpe	Alexandra	Postcard	Unknown	9-264, 7-89, 7-27
Stirpe	Michele	Postcard	Unknown	7-32, 7-131, 4-54
Stirrat	Robert	Email	08/10/21	9-291
Stock	Ben	Email	10/13/21	9-291
Stock	Dennis	Email	08/10/21	9-291
Stokes	Aisha	Petition	Unknown	9-334
Stoll	Susan	Email	08/10/21	9-291
Stoll	Terri	Email	10/13/21	9-291
Stoller	Helene	Email	08/10/21	9-291
Stone	Bebb	Email	10/13/21	9-291
Stone	Donna	Email	08/10/21	9-291
Stone	Peter	Email	10/13/21	9-291
Stone	Sam	Petition	Unknown	9-334
Stoneburg	Ken	Oral	09/23/21	7-150, 4-66
Stopyra	Melanie	Oral	08/26/21	4-62
Stopyra	Melanie	Oral	08/26/21	6-1
Stortz	Lindsey	Email	10/14/21	9-291
Stoughtenger	Kathy	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Strachan	Garfield	Petition	Unknown	9-334
Stracquadanio	John	Email	10/13/21	9-291
Straile	Chris	Postcard	Unknown	7-9, 7-32, 7-27
Strangio	Linda	Email	08/10/21	9-291
Strauch	Katie	Written Form	09/01/21	3-1
Stress	Marc	Online Form	08/08/21	4-47
Stribley	Kathleen	Letter	08/16/21	7-127, 7-126, 7-125, 7-124, 7-123, 7-122, 7-121, 6-65, 2-11
Strick	Josie	Petition	Unknown	9-334
Striggles	Morgan	Petition	Unknown	9-334
Stringer	Matthew	Email	08/10/21	9-291
Stroman	Andre D.	Petition	Unknown	9-334
Stroman	Angela	Petition	Unknown	9-334
Stroman	Henry	Oral	09/09/21	8-2, 7-8, 7-32, 7-130, 2-1
Stroman	Henry	Petition	Unknown	9-334
Stroman-Williams	April V.	Postcard	Unknown	7-89, 7-6, 7-149
Strong	Mike	Email	10/08/21	4-2
Stronski	Edward	Letter	10/11/21	6-28, 5-2, 4-23
Strozak	Marilyn	Email	08/10/21	9-291
Struever	Elizabeth	Email	08/11/21	9-291
Strum	Elizabeth	Email	08/10/21	9-291
Stuff	Elizabeth	Email	08/19/21	9-291
Sturges	Philip	Email	08/10/21	9-291
Suarez	Felicita	Petition	Unknown	9-334
Suarez	Susan	Email	08/10/21	9-291
Subedi	Jay	Petition	Unknown	9-334
Suboski	Kim	Postcard	Unknown	7-32, 7-142, 7-131
Sucapani	Teresa	Email	10/06/21	4-94
Suchon	Christina	Email	08/11/21	9-291
Sucich	Kathleen	Email	08/10/21	9-291
Sue	Eh Ho	Postcard	Unknown	7-84, 7-6, 7-148, 7-129
Sullivan	Kim	Postcard	Unknown	7-149, 7-141, 4-54
Sullivan	Rashawn	Petition	Unknown	9-334
Sullivan	Tim	Email	10/13/21	4-2
Summerwood	Marie	Petition	Unknown	9-334
Sun	Emily	Email	08/11/21	9-291
Surett	Mia	Email	10/11/21	9-291
Surratt	Cjara	Postcard	Unknown	7-4, 7-27, 7-131, 7-21, 7-32
Sutton	Katrina	Postcard	Unknown	7-133
Svereika	Mark	Email	07/27/21	4-71
Swan	James D.	Letter	08/16/21	7-111
Swan	Luisa	Petition	Unknown	9-334
Swan	Rebecca	Email	10/14/21	9-291
Swan	Courtney	Postcard	Unknown	7-1, 7-89, 7-141
Swarts	Rev. James	Email	08/10/21	9-291
Sweeney	Fred	Email	08/07/21	9-291
Swiderski, Jr.	Edward	Letter	08/02/21	7-84, 6-1
Swords	Diane	Postcard	Unknown	4-4, 7-84, 7-129
Syracuse City School District		Letter	10/14/21	4-61
Syracuse City School District		Letter	10/15/21	4-61
Syracuse Housing Authority		Letter	07/27/21	7-22, 4-1
Syracuse Housing Authority		Letter	10/14/21	9-96 through 9-115
Syracuse Metropolitan Transportation Council		Letter	10/08/21	9-151 through 9-175
T.	Cara	Email	08/19/21	9-291
T.	Taylor	Postcard	Unknown	7-27, 7-27, 7-131
Taddeo	Nicholas	Email	08/27/21	9-291
Tadros	Shada	Postcard	Unknown	7-27, 7-27, 7-131
Taffet	Mary D.	Email	08/10/21	4-16
Taggart	Sandra	Email	10/14/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Talbert	Cheyenne	Postcard	Unknown	7-148, 7-141, 4-54
Taliercio	AnnMarie	Online Form	08/17/21	3-1
Tamarin	Rachel	Email	10/14/21	9-291
Tamilio	Meg	Petition	Unknown	9-334
Tartaro	Mr.	Oral	08/18/21	7-62, 7-2
Tarver	Charlene	Oral	08/17/21	8-12, 8-1, 7-9, 7-149, 7-133
Tatum	Patricia	Petition	Unknown	9-334
Tatz	Lev	Email	08/10/21	9-291
Tauro	Natalie	Online Form	10/12/21	7-61, 4-1
Taussig	NF	Email	10/14/21	9-291
Taylor	Abigail	Email	08/10/21	9-136, 9-135, 9-133, 7-52, 4-2
Taylor	Alex	Postcard	Unknown	7-6, 7-4, 7-32
Taylor	Andrea	Email	10/13/21	9-291
Taylor	Drevionne	Petition	Unknown	9-334
Taylor	Earl	Online Form	10/13/21	6-34, 4-61, 4-47, 4-126, 4-1
Taylor	Fay	Online Form	09/01/21	4-2
Taylor	John	Email	10/06/21	3-1
Taylor	Meghan	Email	08/10/21	9-136, 9-135, 9-133, 7-52, 4-2
Taylor	Thom	Email	10/13/21	9-291
Taylor	Valerie	Petition	Unknown	9-334
T-Davis	Osupa	Postcard	Unknown	7-149, 7-141, 4-54
Tearney	Carla	Petition	Unknown	9-334
Tearney, Jr.	Lewis	Postcard	Unknown	7-141, 7-131, 4-54
Tearo	Richard	Petition	Unknown	9-334
Teens in Progress		Postcard	Unknown	7-133, 7-131, 4-54
Tegnestam	Linda	Email	10/13/21	9-291
Telab	Mahmoud	Email	08/02/21	9-291
Telfer	David	Postcard	Unknown	7-84, 7-148, 7-141
Temple	Sara	Email	10/13/21	9-291
Teplin	Lynne	Email	10/13/21	9-291
Terrell	Lakisa	Postcard	Unknown	9-264, 7-27, 7-138
Terry	Clayton	Email	10/14/21	9-291
Terry	Francina	Petition	Unknown	9-334
Terry	Lenwand	Postcard	Unknown	7-6, 7-141, 4-46
Terwilliger	Susan	Email	08/10/21	9-291
Tester	Test	Email	09/03/21	5-7
Tetenbaum	Lawrence	Email	10/13/21	9-291
Tetenov	Alexei	Email	08/10/21	9-291
Thai	Nghi	Postcard	Unknown	9-264, 6-3, 4-104
Thayer	Craig	Email	10/14/21	4-2
Thelen	Deborah	Email	08/10/21	9-291
Thomas	Annette	Postcard	Unknown	7-131, 7-129, 7-129
Thomas	Betty R.	Written Form	09/09/21	7-4
Thomas	Brooke	Email	08/24/21	9-291
Thomas	Casandra	Postcard	Unknown	7-141, 7-131, 7-129
Thomas	Gladys	Petition	Unknown	9-334
Thomas	Glory	Oral	09/09/21	7-21, 7-1, 4-55
Thomas	Jacqueline	Email	08/10/21	9-291
Thomas	Jasmine	Petition	Unknown	9-334
Thomas	Jean	Petition	Unknown	9-334
Thomas	Laurence	Postcard	Unknown	7-133
Thomas	Lewis	Petition	Unknown	9-334
Thomas	Mary	Petition	Unknown	9-334
Thomas	Mary	Postcard	Unknown	7-4, 7-6, 7-129
Thomas	Melissa	Petition	Unknown	9-334
Thomas	Nakya	Postcard	Unknown	7-27, 7-141, 4-54
Thomas	Patricia	Postcard	Unknown	7-141, 7-131, 4-54
Thomas	Tionna	Postcard	Unknown	7-6, 7-131, 4-54, 4-4
Thomason	Wil	Email	10/13/21	9-291
Thompson	Benita	Postcard	Unknown	7-148, 7-141, 7-133
Thompson	Catherine	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Thompson	Danielle	Petition	Unknown	9-334
Thompson	Harry E.	Postcard	Unknown	7-4, 7-27, 7-142, 7-32
Thompson	James	Email	10/13/21	9-291
Thompson	James	Petition	Unknown	9-334
Thompson	James L.	Petition	Unknown	9-334
Thompson	Jasmine	Petition	Unknown	9-334
Thompson	Jessica	Email	08/10/21	9-291
Thompson	Jessica	Email	10/13/21	9-291
Thompson	Joyce	Email	08/10/21	9-291
Thompson	Justine	Petition	Unknown	9-334
Thompson	Madilyn	Postcard	Unknown	7-9, 7-27, 7-27
Thompson	Tatieanna	Petition	Unknown	9-334
Thompson	Virginia	Postcard	Unknown	7-84, 7-149, 7-148
Thornell	Maria	Email	08/10/21	9-291
Thornwell	Bryse	Petition	Unknown	9-334
Thrall	Mattison	Online Form	10/12/21	4-1
Tiberio	Emily	Online Form	10/12/21	4-1
Tietje-Mietz	Sarah	Postcard	Unknown	7-27, 7-141, 4-67
Tiffany	Ann	Petition	Unknown	9-334
Tiffany	Ann	Letter	08/30/21	4-61, 4-1
Timian	Suzanne	Email	10/13/21	9-291
Tinelli	Gene	Email	08/24/21	5-15
Tinsley	Thomas	Petition	Unknown	9-334
Tirado	Cameron	Petition	Unknown	9-334
Titus	Adrienne	Petition	Unknown	9-334
Titus	Kelsey	Email	10/14/21	9-291
Titus	Wanda	Petition	Unknown	9-334
Tobin	Erin	Online Form	10/12/21	4-47
Todisco	Joe	Online Form	09/14/21	5-10, 4-2, 2-1
Todzia	Frank	Online Form	10/14/21	3-1
Tolbert	Travis	Email	10/14/21	9-291
Toll	Bridget	Petition	Unknown	9-334
Tolles	Jason	Postcard	Unknown	7-133
Tom	Jason	Postcard	Unknown	7-89, 7-141, 4-54
Tomeo	Donna	Email	10/13/21	9-291
Tonini	Joe	Email	08/10/21	9-291
Tookes, Jr.	Johnnie L.	Postcard	Unknown	7-89, 7-6, 7-149
Tookes, Jr.	Johnnie L.	Postcard	Unknown	7-21
Torrence	Adrienne	Petition	Unknown	9-334
Torrence	Adrienne	Petition	Unknown	9-334
Torrence	Rosemary	Petition	Unknown	9-334
Torrence	Tonia	Petition	Unknown	9-334
Torres-Lopez	Andy	Petition	Unknown	9-334
Torrey		Petition	Unknown	9-334
Toth	Melissa	Email	08/10/21	9-291
Totino	Lucy	Petition	Unknown	9-334
Totino	Lucy	Postcard	Unknown	7-84, 7-141, 4-67
Totino	Lucy	Postcard	Unknown	7-84, 7-133, 4-54
Town of Clay, et al.		Letter	10/14/21	9-243
Town of DeWitt		Letter	10/14/21	9-185 through 9-225
Town of DeWitt, Multiple Signatories		Letter	10/12/21	9-176 through 9-184
Town of Salina	Petition	Email	10/06/21	4-94
Town of Salina		Letter	10/14/21	9-245 through 9-248
Town of Salina		Letter	10/14/21	9-249 through 9-252
Town of Van Buren		Letter	10/08/21	9-243
Townsend	Cynthia	Postcard	Unknown	7-6, 7-4, 7-129
Townsend	Erin	Email	10/12/21	9-291
Townsend	Virgie	Email	08/23/21	9-291
Townsend	Virgie	Online Form	10/13/21	4-1
Tozzi	Suellen	Email	08/19/21	9-291

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Traina	Diane	Email	08/10/21	9-291
Traino Jr	John	Online Form	07/20/21	2-1
Traub	Mollie	Email	08/10/21	9-291
Trayner	Mary	Petition	Unknown	9-334
Traynor, Esq.	Mary E.	Postcard	Unknown	7-27, 7-133, 7-22, 7-32
Treitel	Stuart	Email	08/11/21	9-291
Trifunovski	Nicolina	Petition	Unknown	9-334
Trinkaus	J	Email	10/13/21	9-291
Tripepi	David	Online Form	07/16/21	4-11
Tripolone	Sharon	Online Form	08/09/21	6-3
Tripp	Andrew	Petition	Unknown	9-334
Troland	Mary	Email	10/13/21	9-291
Trott	Melissa	Email	08/10/21	9-291
Trotta	Anthony	Email	10/13/21	9-291
Troutman	Phil	Email	08/19/21	9-291
Trucking Association of New York		Letter	10/14/21	9-371 through 9-384
Trudell	Ray	Postcard	Unknown	7-27, 7-27, 4-67
Truell	Stacey	Petition	Unknown	9-334
Tucker	Kevin	Oral	09/09/21	7-32, 7-133, 4-55
Tucker	Mark	Oral	08/17/21	7-9, 7-84, 6-9
Tucker-Schultz	Elizabeth	Email	08/07/21	9-291
Tuggle	Ronan	Email	09/14/21	9-291
Tunny	Eleanor	Email	08/10/21	9-291
Turner	Adam	Postcard	Unknown	7-9, 7-32, 7-27
Turner	Amanda	Email	10/13/21	9-291
Turner	Juanita	Postcard	Unknown	7-141, 7-131, 7-129
Turner	Lakisha	Postcard	Unknown	7-32, 7-142, 7-138
Turner	Tracy	Postcard	Unknown	7-141, 7-131, 7-129
Twichell	Lucy	Email	08/03/21	9-291
Tyler	Keith	Online Form	10/12/21	4-61, 4-1
Tyler	Rebecca	Petition	Unknown	9-334
Tyrell	Shawn	Voicemail	08/26/21	4-47
Tyrol	Patty	Email	10/13/21	9-291
Tyrrell	Shaun	Postcard	Unknown	7-9, 7-27, 4-54, 4-1
U.	D.	Written Form	09/09/21	7-4
U.	Walt	Written Form	09/09/21	7-4
Ude	Jasmine	Petition	Unknown	9-334
Ulatowski	Damian	Oral	09/01/21	7-150
Ullyette	Laurel	Email	08/07/21	9-291
Umbardia	Ira	Postcard	Unknown	7-89, 7-27, 7-131
Unger	Barbara	Email	10/16/21	9-291
University at Buffalo Law School		Letter	07/30/21	8-1, 8-12
Upstate Minority Economic Alliance		Letter	10/14/21	7-133
Urban Jobs Task Force		Letter	10/13/21	9-334 through 9-336
USDOJ		Letter	10/13/21	7-79, 7-74, 7-156, 7-155
USEPA		Letter	10/14/21	9-226 through 9-241
Uwineza	Francine	Petition	Unknown	9-334
Valenzuela	Luis	Email	08/11/21	9-291
Valerino	June M.	Petition	Unknown	9-334
Vallelonga	Damian	Email	10/13/21	9-291
Vallelonga	Damian	Online Form	10/13/21	4-1
Van Allen	Thomas	Petition	Unknown	9-334
Van Norstrand	Ron	Postcard	Unknown	7-32, 7-149, 7-138
Van Norstrand	Ron	Postcard	Unknown	7-6, 7-138, 4-54
Van Norstrand	Ronald	Oral	08/17/21	7-27, 7-133
Van Nostrand	Ronald	Petition	Unknown	9-334
Van Valkenburgh	Cheryl	Online Form	09/08/21	4-22
Van Wey	Delaney	Online Form	10/12/21	4-61, 4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
VanArsdale	George	Email	08/30/21	9-291
Vandervort	Eric	Postcard	Unknown	9-264, 7-27, 7-131
Vandervort	Eric	Postcard	Unknown	7-9, 7-133, 7-131, 4-1, 7-133
Vanetten	Margot	Email	10/13/21	9-291
VanInderstine	Elizabeth	Online Form	10/09/21	6-25
Vanoran	Meredith	Petition	Unknown	9-334
VanTassel	Veronica	Online Form	10/12/21	4-1
Vargas	Danny	Petition	Unknown	9-334
Vargas	Lilia	Email	08/11/21	9-135, 9-133, 7-52
Vatter	Terry	Email	08/10/21	9-291
Vazille	Giovanni	Oral	08/18/21	7-133
Vazquez	Sydney	Petition	Unknown	9-334
Vedder	Karen	Online Form	08/17/21	4-2
Vee	Ordell	Email	08/10/21	9-291
Velasco	Luz M.	Petition	Unknown	9-334
Velez	Abraham	Email	08/10/21	9-291
Velez	Francisco	Email	10/13/21	9-291
Velez	S.	Email	08/10/21	9-291
Vella	Joseph	Email	10/13/21	9-291
Venidis	Maria	Email	10/13/21	9-291
Venkatesh	Laila	Postcard	Unknown	7-32, 7-27, 7-142, 7-21, 7-89, 7-141
Venkatesh		Postcard	Unknown	7-148, 7-133, 6-3
Venskus	Abigail	Online Form	10/14/21	4-1
Venskus	Amy	Postcard	Unknown	7-89, 7-141, 4-54
Vera	Elisheba	Email	08/10/21	9-291
Verbeck	Sue	Online Form	08/18/21	6-11, 4-1
Verhoog	Charles	Online Form	09/26/21	4-1
Vericker	Carol	Email	08/10/21	9-291
Vernon	Margaret	Email	08/11/21	9-291
Versaggi	Nina	Email	10/13/21	9-291
Victoria	Martina	Email	10/13/21	9-291
Videto	Brian	Online Form	08/30/21	4-61
View	Kathleen	Email	08/10/21	9-291
Viglietta	Martha	Petition	Unknown	9-334
Viglietta	Martha	Petition	Unknown	9-334
Vihlen	Ayyhaunnah	Petition	Unknown	9-334
Villalobos	Elizabeth	Email	08/11/21	9-291
Villanova	Michael	Email	08/10/21	9-291
Villenave	Joyce	Email	09/13/21	6-42, 6-11, 4-4
Vineyard	Rebecca	Email	08/10/21	9-291
Vinikoff	Jerald	Email	10/13/21	9-291
Violante	Michael	Email	08/11/21	9-291
Virtuoso	Lauren	Email	10/13/21	9-291
Virzi	Diane	Email	10/13/21	9-291
Visceglia	Steven	Petition	Unknown	9-334
Vishnesky	Phillip	Email	10/06/21	4-34, 4-2
Viviano	Rose	Postcard	Unknown	7-6, 7-141, 4-46
Viviano-Crafts	Carmen	Postcard	Unknown	7-89, 7-32, 7-131, 7-21
Viviano-Crafts	Carmen	Postcard	Unknown	7-89, 7-27, 7-148
Viviano-Crafts	Carmen	Written Form	08/18/21	7-133
Vlasiadis	Chrisanthos	Email	09/08/21	9-291
Voda	Patricia	Email	10/13/21	9-291
Volcko	Bill	Email	08/14/21	4-102
Volcko	William	Online Form	08/20/21	4-102
Volcko	William	Voicemail	08/14/21	4-102
Vollweiler	Eleanor	Email	08/10/21	9-291
von Geldern	Ken	Email	08/11/21	9-291
Voninski	Angela	Email	10/14/21	4-2, 4-15, 3-1
Voorhees	Ryan	Letter	10/14/21	8-19
Voorheis	Patrick	Online Form	10/12/21	4-1
Vortice	Alysia	Postcard	Unknown	7-32, 7-27, 7-27

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Vortice	Murry	Postcard	Unknown	7-27, 7-27, 7-142
Vosganian	Chuck	Postcard	Unknown	7-89, 7-141, 7-133
Vosganian	Chuck	Postcard	Unknown	7-84, 7-32, 7-133, 7-65
Vought	Olivia	Online Form	10/13/21	4-1
Vrbanic	Adam	Email	08/19/21	9-291
W	Kevin	Online Form	09/03/21	8-1
W-----	Lisa	Petition	Unknown	9-334
Wachtel	Fern H.	Email	08/10/21	9-291
Waddell	Chideya	Petition	Unknown	9-334
Wade	Kimberly	Email	08/10/21	9-291
Wade	Windsor	Email	08/11/21	9-291
Wadley	Susan	Petition	Unknown	9-334
Waelder	Karen	Online Form	08/26/21	8-2, 7-133, 4-1
Wager	Ray	Email	08/10/21	9-291
Wagner	Darlene	Postcard	Unknown	9-264, 7-89, 7-27
Wagner	Fred	Oral	08/17/21	8-12, 8-1, 7-84, 7-59, 7-52, 6-69, 6-28, 5-10
Wagner	Pat	Email	08/10/21	9-291
Wagner	Raymond	Email	10/13/21	9-291
Wahl	Tom	Oral	09/01/21	4-1
Walberg	Alex	Postcard	Unknown	7-27, 7-27, 7-131
Walcott	Kristin	Postcard	Unknown	7-84, 7-4, 7-32
Walcott	Peter	Postcard	Unknown	7-89, 7-4, 4-104
Wald	Susan	Email	08/10/21	9-291
Waldauer	M	Postcard	Unknown	7-9, 7-27, 4-1
Waldman	Judith	Email	08/10/21	9-291
Waldow	Teresa	Email	10/13/21	9-291
Walker	Cyrstal	Petition	Unknown	9-334
Walker	Jenny	Email	08/10/21	9-291
Walker	Kiara	Petition	Unknown	9-334
Walker	Kyle	Petition	Unknown	9-334
Walker	Laurie	Email	10/14/21	9-291
Walker	Miranda	Petition	Unknown	9-334
Walker	Nora	Email	08/10/21	9-291
Walker	Sandra Anne	Petition	Unknown	9-334
Wall	Mary	Email	10/13/21	9-291
Wall	Paul	Petition	Unknown	9-334
Wallace	Jocelyn	Email	08/10/21	9-291
Wallace	Jonathan	Postcard	Unknown	7-133
Wallak	Will	Online Form	10/14/21	4-1
Waller	Michael	Petition	Unknown	9-334
Wallitt	Roberta	Email	08/19/21	9-291
Walsh	Ben	Oral	08/17/21	8-5, 7-9, 7-78, 7-21, 7-129, 4-55, 4-104, 4-1
Walsh	Gerald	Email	08/10/21	9-291
Walsh	Mary Kate	Postcard	Unknown	7-6, 7-148, 4-67
Walter	Elaine	Online Form	09/06/21	4-1
Walter	James	Written Form	09/09/21	7-4
Walters	Lenysia	Petition	Unknown	9-334
Walters	Mackenzie	Petition	Unknown	9-334
Walters	Samantha	Petition	Unknown	9-334
Walzer	Barbara	Written Form	07/23/21	4-1
Ward	Biallah	Petition	Unknown	9-334
Ward	Kelly	Email	08/10/21	9-291
Ward	Kelly	Postcard	Unknown	7-89, 7-141, 7-133, 8-6
Ward	Kelly	Postcard	Unknown	7-9, 7-27, 7-27
Ward	Rachel	Petition	Unknown	9-334
Warner	Eric	Petition	Unknown	9-334
Warner	Hillary	Email	08/10/21	9-291
Warren	Sandra	Email	10/13/21	9-291
Wartell	Neva	Email	08/10/21	9-291
Washington	Chris	Email	08/10/21	9-291
Washington	Kia	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Washington	Lubna	Email	10/13/21	9-291
Washington	Meaghan	Petition	Unknown	9-334
Wasielewski	Loretta	Email	08/10/21	9-291
Wasilewski	Mary A	Postcard	Unknown	7-27, 7-142, 7-131
Wasser	Perrine	Email	10/12/21	9-291
Wasser	Perrine	Postcard	Unknown	7-84, 7-27, 7-131
Waters	Austin	Postcard	Unknown	7-141, 7-138, 7-131
Waters	Heather	Postcard	Unknown	4-1
Watkins	Andrew	Online Form	10/05/21	7-52, 6-26, 5-10
Watkins	DeWayne	Petition	Unknown	9-334
Watkins	Lisa	Email	08/10/21	9-291
Watkins, Sr.	Tyrell	Postcard	Unknown	7-133
Watson	Sonia	Petition	Unknown	9-334
Watson	Taylor-Sierra P.	Postcard	Unknown	7-89, 7-129, 7-138, 7-141
Watts	Jim	Email	10/03/21	7-133, 4-1
Watts	Nicole	Postcard	Unknown	7-6, 7-27, 4-54, 8-6, 8-8
Wayner	Theresa	Petition	Unknown	9-334
Weah	Princess	Postcard	Unknown	7-6, 7-133, 7-131
Weatherly	Shawn	Petition	Unknown	9-334
Webb	Betty T.	Petition	Unknown	9-334
Webb	Cainaan	Petition	Unknown	9-334
Webb	Cedric	Postcard	Unknown	7-84, 4-67, 4-54
Webb	Gwendolyn	Petition	Unknown	9-334
Webb	Roger	Petition	Unknown	9-334
Webb	Senique	Petition	Unknown	9-334
Webber	Jason	Petition	Unknown	9-334
Weber	Libby	Petition	Unknown	9-334
Weber	Sylvia	Email	10/13/21	9-291
Webster	Holly	Petition	Unknown	9-334
Webster	Portia	Petition	Unknown	9-334
Weeks	Nathalie	Email	08/10/21	9-291
Weelock	Jen	Postcard	Unknown	7-9, 7-32
Weil	Madeline	Email	08/25/21	9-291
Weinberg	Martin	Email	08/10/21	9-291
Weineck	Dina-Marie	Petition	Unknown	9-334
Weingarth	Daniel	Oral	08/18/21	7-96, 6-1
Weingarth	Daniel N.	Written Form	08/18/21	7-96
Weinstein	Gary	Email	10/03/21	7-93, 4-124
Weiss	Jill	Petition	Unknown	9-334
Weissman	Marsha	Postcard	Unknown	7-133, 4-1, 7-6, 7-27
Welch	Denise	Petition	Unknown	9-334
Welch	Morgan	Postcard	Unknown	7-84, 7-148, 4-67
Welch	Rosemary	Postcard	Unknown	7-84, 4-67, 4-104
Welch Fair	Erin	Postcard	Unknown	7-84, 7-6, 7-148
Welcome	Cathy	Petition	Unknown	9-334
Wellman	Judith	Online Form	08/03/21	4-47
Wells	Freddie	Postcard	Unknown	7-32, 7-131, 6-3
Wells	Mildred	Petition	Unknown	9-334
Wells	Olivia	Email	08/26/21	9-291
Welych	Anita	Online Form	10/13/21	4-1
Wentworth	Carolisa	Postcard	Unknown	7-148, 7-148, 7-141
Wesolowski	James	Email	08/10/21	9-291
Westbrook	Larithi	Petition	Unknown	9-334
Westbrook	Lyrree	Petition	Unknown	9-334
Wester	Zyian	Email	10/13/21	9-291
Western	Grace	Online Form	10/13/21	4-1
Whaley	Clarice	Petition	Unknown	9-334
Whaley	Frank	Petition	Unknown	9-334
Wharton	Jay	Petition	Unknown	9-334
Wheat	Nuala	Petition	Unknown	9-334
Wheelock	Jen	Postcard	Unknown	7-9, 7-32, 7-131

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Whetley	Lisa	Postcard	Unknown	7-6, 7-4, 7-131
Whitaker	Alberta	Petition	Unknown	9-334
Whitaker	Alberta	Petition	Unknown	9-334
Whitaker	Anita	Petition	Unknown	9-334
Whitaker	JaQuesha	Petition	Unknown	9-334
White	Caleb	Postcard	Unknown	7-149, 7-148, 7-138
White	Dorothy	Email	08/10/21	9-291
White	George	Email	08/10/21	9-291
White	Jimmy D.	Petition	Unknown	9-334
White	Keith Nolan	Petition	Unknown	9-334
White	Kirsten	Email	08/10/21	9-291
White	Lourie	Postcard	Unknown	7-141, 7-133, 4-67
White	Murlene	Petition	Unknown	9-334
White	Qurom	Petition	Unknown	9-334
White	Rachel	Email	08/10/21	9-291
White	Randy	Postcard	Unknown	7-4, 7-27, 7-142
White	Rudy	Petition	Unknown	9-334
White	Samuel	Petition	Unknown	9-334
White	Simone	Postcard	Unknown	7-141, 7-129, 4-104
White	Wendolyn	Postcard	Unknown	7-89, 7-141, 7-131
White	Keith N.	Petition	Unknown	9-334
Whitefeather	Angelica	Email	08/19/21	9-291
Whitehead	Kurtisha	Postcard	Unknown	7-149, 7-141, 4-54
Whitehead	R.	Postcard	Unknown	4-2
Whitehurst	Jashunda	Postcard	Unknown	4-108, 7-129, 7-149
Whiteside	Christina	Postcard	Unknown	7-27, 7-142, 4-54, 4-1
Whitman	Lucien	Email	10/13/21	9-291
Whitney	Shirley	Email	08/10/21	9-291
Whitney	Vivian	Online Form	10/13/21	4-1
Whoriskey	Vivian	Email	10/13/21	9-291
Whyman	Mike	Email	08/10/21	9-291
Wichmann	Scott	Online Form	07/21/21	3-1
Wickham	Christine	Online Form	10/12/21	4-61, 4-1
Wickham	M.	Email	10/14/21	4-2
Widdekind	Claire	Postcard	Unknown	7-4, 7-131, 7-131
Widdekind	Emily	Postcard	Unknown	7-9, 7-4, 7-32
Widrick	Benjamin	Email	10/14/21	4-2
Wiehenstroer	Melissa	Online Form	10/12/21	4-1
Wierbinski	Elizabeth	Email	10/14/21	9-291
Wiezalis	Carl P.	Postcard	Unknown	6-1, 7-1, 7-67, 7-118
Wilbur	Richard	Email	10/14/21	4-94, 4-2
Wilcock	Michael	Email	08/10/21	9-291
Wilcox	Janelle	Petition	Unknown	9-334
Wilcox	Linda	Letter	10/14/21	4-61, 4-2
Wilder	Ian	Email	08/10/21	9-291
Wildrick	Chris	Email	09/13/21	4-55
Wiley	Kimberly	Email	08/27/21	9-291
Wilkenson	Frank	Petition	Unknown	9-334
Wilkins	Dominic	Postcard	Unknown	9-264, 7-27, 7-141
Wilkinson	Linda	Email	10/06/21	7-52
Williams	Kevin	Petition	Unknown	9-334
Williams	Ronnie	Petition	Unknown	9-334
Williams, Jr.	Vernon	Postcard	Unknown	7-6, 7-32, 7-131
Williams	Ahkeen	Petition	Unknown	9-334
Williams	Aldean	Petition	Unknown	9-334
Williams	Angela	Petition	Unknown	9-334
Williams	Angela	Postcard	Unknown	7-32
Williams	Anne	Petition	Unknown	9-334
Williams	Anne	Postcard	Unknown	7-32, 7-27, 7-27
Williams	Anthony	Petition	Unknown	9-334
Williams	Aoyah	Postcard	Unknown	7-32, 7-129

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Williams	Arlene	Petition	Unknown	9-334
Williams	Camar H.	Postcard	Unknown	9-253 through 9-257
Williams	Casey	Petition	Unknown	9-334
Williams	Chantia	Petition	Unknown	9-334
Williams	Christopher	Petition	Unknown	9-334
Williams	Ciara	Postcard	Unknown	7-138, 7-133, 4-54
Williams	Corre	Petition	Unknown	9-334
Williams	D.	Email	08/11/21	9-291
Williams	DeAnna	Email	10/13/21	9-291
Williams	Devar	Postcard	Unknown	7-133
Williams	Edward	Petition	Unknown	9-334
Williams	Elizabeth	Petition	Unknown	9-334
Williams	Emma	Email	07/09/21	9-291
Williams	Eric	Email	10/13/21	9-291
Williams	Evelyn	Petition	Unknown	9-334
Williams	Evelyn	Postcard	Unknown	7-89, 7-148, 7-141
Williams	Evette	Petition	Unknown	9-334
Williams	Gale	Petition	Unknown	9-334
Williams	Gale	Petition	Unknown	9-334
Williams	Gwendolyn	Petition	Unknown	9-334
Williams	Ida	Postcard	Unknown	9-253 through 9-257
Williams	Isaiah	Petition	Unknown	9-334
Williams	Janet	Email	10/13/21	9-291
Williams	Jason	Petition	Unknown	9-334
Williams	John	Postcard	Unknown	8-6, 8-8
Williams	Jumaane D.	Postcard	Unknown	7-141, 7-133, 4-67
Williams	Kathleen	Email	08/10/21	9-291
Williams	Kionna	Petition	Unknown	9-334
Williams	Lamar H.	Postcard	Unknown	9-253 through 9-257
Williams	Laverne	Petition	Unknown	9-334
Williams	Lawrence	Petition	Unknown	9-334
Williams	Lawrence S.	Petition	Unknown	9-334
Williams	Marquise	Petition	Unknown	9-334
Williams	Monica	Email	10/12/21	9-291
Williams	Monique N.	Petition	Unknown	9-334
Williams	Myles	Petition	Unknown	9-334
Williams	Naomi	Postcard	Unknown	7-6, 4-54, 4-46
Williams	Nathaniel	Email	08/10/21	9-291
Williams	Nia	Email	10/13/21	9-291
Williams	Paul F.	Petition	Unknown	9-334
Williams	Penny	Petition	Unknown	9-334
Williams	Ranetta	Postcard	Unknown	7-84, 7-148, 7-133
Williams	Rasia	Petition	Unknown	9-334
Williams	Robert	Email	08/10/21	9-291
Williams	Sheldon S.	Postcard	Unknown	7-9, 7-27, 7-149
Williams	Sonya	Petition	Unknown	9-334
Williams	Stephanie	Petition	Unknown	9-334
Williams	Ted S.	Petition	Unknown	9-334
Williams	Tisean	Petition	Unknown	9-334
Williams	Vaughn	Petition	Unknown	9-334
Williams	Vaughn	Petition	Unknown	9-334
Williams	Vaughn	Postcard	Unknown	7-133
Williams	Velnor	Petition	Unknown	9-334
Williams	Walter	Petition	Unknown	9-334
Williams, II	Morgan	Postcard	Unknown	7-89, 7-129, 4-54, 4-46
Williams, II	Morgan	Postcard	Unknown	7-89, 7-84, 7-141
Williams, Jr.	James J.	Postcard	Unknown	9-253 through 9-257
Williams, Sr.	Alphonsa	Petition	Unknown	9-334
Williamson	Andrew	Email	08/22/21	9-291
Williamson	Rennate	Petition	Unknown	9-334
Williford	Berny	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Willis	Jeannie	Postcard	Unknown	7-6, 7-32, 7-149
Wills	Jason	Email	09/02/21	9-291
Willsbrough	Jeremy	Email	08/10/21	9-291
Willsbrough	Joss	Email	08/10/21	9-291
Willsbrough	Jeremy	Online Form	08/18/21	9-291, 8-13
Wilmer	Fred	Online Form	10/11/21	5-10
Wilson	Brenda	Oral	09/09/21	7-32
Wilson	Carter	Petition	Unknown	9-334
Wilson	Coach	Postcard	Unknown	7-32, 7-133, 4-54
Wilson	Gloria	Email	10/13/21	9-291
Wilson	LeMia	Postcard	Unknown	7-4, 7-32, 7-142
Wilson	Mabel	Petition	Unknown	9-334
Wilson	Mabel	Voicemail	09/14/21	5-13
Wilson	Mable	Oral	08/18/21	7-133, 7-1, 4-55
Wilson	Mable	Oral	08/18/21	7-78
Wilson	Mable	Postcard	Unknown	7-6, 7-32, 7-138
Wilson	Mable	Postcard	Unknown	7-4, 7-142, 7-129
Wilson	Margaret	Email	08/10/21	9-291
Wilson	Mary Ann	Postcard	Unknown	7-131, 4-46, 4-104
Wilson	Mary Anne	Email	10/13/21	9-291
Wilson	Mary Anne	Online Form	10/14/21	4-1
Wilson	Shan	Email	10/13/21	9-291
Wilson	Sharon	Email	08/03/21	9-291
Wilson	Sherita	Email	08/10/21	9-291
Wilson	Sherita	Email	10/13/21	9-291
Wilson	Talisyanna	Petition	Unknown	9-334
Winchell	Gary	Online Form	08/16/21	3-1
Windus	Jared	Email	08/14/21	9-291
Winer	Karen	Email	08/10/21	9-291
Wingate	Harriet	Petition	Unknown	9-334
Winkelman	Scott	Email	08/12/21	4-5
Wirsig	Martin	Online Form	09/16/21	4-2
Wiseltier	Marsha	Email	08/10/21	9-291
Wisely	Adam	Online Form	10/14/21	4-1
Witherspoon	Amner	Petition	Unknown	9-334
Wittenborn	Andrew & Kathleen	Email	10/13/21	9-291
Witting	Laurel	Email	10/13/21	9-291
Wittman	Benjamin	Petition	Unknown	9-334
Wittman	Charles	Email	10/13/21	9-291
Wittner	Julia	Online Form	10/01/21	7-106, 4-124
Wolter	Mary Ellen	Email	10/02/21	7-93, 4-15, 4-124
Wojciechowski	Christopher	Petition	Unknown	9-334
Wolak	Edward S.	Letter	09/03/21	7-36
Wolcott	Kristin	Written Form	07/23/21	7-133, 7-129
Wolcott	Kristin	Written Form	07/23/21	7-133
Wolf	Doug	Postcard	Unknown	7-27, 7-27, 7-133
Wolf	Douglas	Online Form	10/12/21	4-61
Wolf	Douglas	Postcard	Unknown	7-84, 4-67, 4-54
Wolf	Elaine	Letter	08/23/21	8-6, 8-2, 7-9, 7-29, 7-149, 7-138, 7-133, 4-71, 4-61, 4-1
Wolf	Elaine	Postcard	Unknown	7-89, 7-32, 4-54, 7-21
Wolf	Elaine	Postcard	Unknown	7-138, 7-131, 4-67, 7-133
Wolff	Cathy	Online Form	08/08/21	4-47
Wonders	Aran	Written Form	07/23/21	4-54
Wong	Olivia	Email	10/14/21	9-291
Wong	Shannon	Email	08/10/21	9-291
Wood	Andrew	Email	08/10/21	9-135, 9-133, 7-52
Wood	Charles	Email	08/29/21	4-15, 4-138
Wood	Charles	Online Form	08/15/21	6-11
Wood	Christine	Postcard	Unknown	9-264, 7-27, 7-133

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Wood	Christine	Postcard	Unknown	7-4, 7-27, 7-131
Woodfork	Mary	Postcard	Unknown	7-32, 7-133, 4-104
Woodfork	Terry	Email	08/18/21	9-291
Woodfork	Terry	Online Form	08/31/21	7-138, 4-91, 4-70, 4-67, 4-47, 4-46, 4-46, 4-44, 4-4, 4-144, 4-136, 4-1
Woodfork	Terry	Online Form	08/31/21	7-9, 7-32, 7-23, 7-137, 7-136, 7-133, 7-131, 4-55, 4-55, 4-3, 4-140, 4-133
Woodfork	Terry J.	Postcard	Unknown	7-9, 7-27, 7-138, 4-85
Woodruff	Cate	Email	08/10/21	9-291
Woodrum	Amos	Postcard	Unknown	7-133
Woods	Michael	Petition	Unknown	9-334
Woods	Vessa	Postcard	Unknown	7-149, 7-138, 4-104, 4-2, 6-1, 7-133
Woods	Victoria	Petition	Unknown	9-334
Workman	Irene	Postcard	Unknown	7-9, 7-4, 7-129
Works	Joevon	Postcard	Unknown	7-27, 7-27, 7-142
Works	Joevonna	Petition	Unknown	9-334
Works	Quin	Email	10/13/21	9-291
Works	Quineese	Email	08/10/21	9-291
Worrell	Kia	Petition	Unknown	9-334
Worthy	James	Petition	Unknown	9-334
Woudall	Kenisha	Petition	Unknown	9-334
Wren	Laquashia	Online Form	07/21/21	3-1
Wright	Ernie	Postcard	Unknown	7-1
Wright	Laura	Written Form	10/14/21	7-52, 7-40, 7-134, 6-43, 6-40, 4-70
Wright	Mary E.	Email	08/11/21	9-291
Wright	Tim	Postcard	Unknown	7-133
Wright	Tysean	Postcard	Unknown	7-4, 7-142, 7-129
Wright	Yarvon	Postcard	Unknown	7-133
Wright Noel	Theresa	Petition	Unknown	9-334
Wright, Jr.	Roosevelt Rick	Petition	Unknown	9-334
Wyan	Cynthia	Petition	Unknown	9-334
Wyman	Brandon	Online Form	10/12/21	4-1
Wynn	Kaalar	Petition	Unknown	9-334
Wynn	Peter	Petition	Unknown	9-334
Wyver	Isaac	Petition	Unknown	9-334
Y.	Ruby	Email	08/03/21	9-291
Yahweh	Yahweh	Petition	Unknown	9-334
Yamasaki	Mariko	Email	08/11/21	9-291
Yamini	Hassan	Petition	Unknown	9-334
Yarbrough	James Ash	Email	08/10/21	9-291
Yarbrough	James Ash	Online Form	08/23/21	9-291, 4-1
Yaroski	Janine M.	Postcard	Unknown	7-138, 4-54, 4-104
Yarobino	Erin	Email	10/13/21	9-291
Yates	Larry	Email	08/10/21	9-291
Yates-Richards	Meina	Petition	Unknown	9-334
Yemma	Azariah	Email	10/12/21	9-291
Yemma	Azariah	Postcard	Unknown	7-9, 7-138, 4-54
Yepez	Michael	Postcard	Unknown	7-129
Yodice	Kristopher	Email	08/10/21	9-291
Yoenst	Alex	Email	08/19/21	9-291
Yongo	Kat	Postcard	Unknown	7-6, 7-32, 7-27
York	Jeffrey	Online Form	10/13/21	4-1
Yost	Carol	Email	08/10/21	9-291
Young	Adam	Oral	09/13/21	4-1
Young	Anthony	Petition	Unknown	9-334
Young	Jane	Email	10/13/21	9-291
Young	Kim	Email	10/13/21	9-291
Young	Regina	Petition	Unknown	9-334
Young	Roberta	Email	08/10/21	9-291
Young	Shila	Petition	Unknown	9-334

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Younger	Kristina	Email	08/10/21	9-291
Younger	Leontyne	Petition	Unknown	9-334
Zackrone	Alex	Email	08/19/21	9-291
Zaientz	Stephanie	Email	08/10/21	9-291
Zaker	Bahar	Online Form	10/12/21	4-1
Zaler	Frances	Petition	Unknown	9-334
Zamora	Cesar	Email	10/13/21	9-291
Zampis	Eduardo	Petition	Unknown	9-334
Zavaglia	Julian	Email	10/12/21	9-291
Zeliff	Zach	Postcard	Unknown	9-264, 7-32, 7-133
Zeliff	Zach	Postcard	Unknown	7-133
Zeliff	Zach	Postcard	Unknown	7-32, 7-27, 7-131
Zeller	Robert	Email	08/11/21	9-291
Zhe-Heimerman	Jeremy	Email	10/13/21	9-291
Zicari	Alice	Postcard	Unknown	7-4, 7-27, 7-131
Zicari	Alice	Postcard	Unknown	7-9, 7-32, 7-27
Zicari	Lawrence	Postcard	Unknown	7-32, 7-142, 7-131
Ziegler	Barbara	Email	10/13/21	9-291
Zielinski	Sonya	Postcard	Unknown	7-12
Zimmer	Theresa	Email	10/12/21	7-138, 4-55
Zimmerman	Paula	Email	08/11/21	9-291
Zimmerman	Tia	Petition	Unknown	9-334
Zimmerman		Voicemail	10/06/21	4-2
Zimmermann	Molly	Email	10/14/21	7-133, 4-72, 4-71, 4-55, 4-49, 4-4, 4-15, 4-141, 4-104, 4-1
Zinck	Tyler	Email	09/12/21	9-291
Zinn	Andrea	Email	08/19/21	9-291
Zio	Sunaway	Petition	Unknown	9-334
Ziobrowski	Martin	Online Form	10/08/21	5-10
Zoccoli-Rodriguez	Victoria	Postcard	Unknown	7-9, 7-27, 7-148, 4-1
Zohar	Amanda	Petition	Unknown	9-334
Zolman	Frederick	Petition	Unknown	9-334
Zolna	Fred	Online Form	10/12/21	7-9, 7-133, 4-71
Zolna	Fred	Postcard	Unknown	7-27, 7-148, 7-133
Zorn	Dianne	Petition	Unknown	9-334
Zorn	Esther	Postcard	Unknown	7-149, 7-142, 7-141, 7-89
Zorn	Esther	Postcard	Unknown	7-131, 6-3, 4-67
Zuckerman	Karen	Email	10/13/21	9-291
Zulkofske	Dean	Postcard	Unknown	4-67, 4-46, 4-104, 4-55
Zumchak	Elizabeth	Email	08/10/21	9-291
Zwir	John	Online Form	07/20/21	4-2
	Ali	Postcard	Unknown	7-131
	Anna	Postcard	Unknown	7-9, 7-129, 7-21, 7-32
	Anna	Postcard	Unknown	7-4, 7-32, 7-131
	Aurelien	Postcard	Unknown	9-264, 7-32, 7-27
	Carl	Petition	Unknown	9-334
	Carrie	Online Form	08/18/21	4-2
	Christopher	Petition	Unknown	9-334
	Darryl	Online Form	10/06/21	3-1
	Eddie	Voicemail	10/07/21	6-1
	Edward	Postcard	Unknown	7-6, 7-4, 7-27
	Elizabeth	Email	08/10/21	9-291
	Jennifer	Voicemail	08/19/21	4-1
	Jimmy	Online Form	10/14/21	4-55
	Kafi	Postcard	Unknown	7-32, 7-27, 7-27
	Lawrence	Postcard	Unknown	7-6, 7-4, 7-32, 7-27, 7-27, 4-104
	Lizard	Postcard	Unknown	7-6, 7-129, 4-54, 7-138
	Mike	Online Form	10/10/21	2-1
	Nehemiah	Postcard	Unknown	7-4, 7-27, 7-27
	Olivia	Postcard	Unknown	7-27, 7-142, 7-129
	Queenie	Postcard	Unknown	7-27, 7-27, 7-142

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
	Sandra	Petition	Unknown	9-334
	Sharelle	Petition	Unknown	9-334
	Steve	Voicemail	08/04/21	4-114
	Tina	Postcard	Unknown	7-6, 7-32, 7-142, 7-32
	Tisya	Petition	Unknown	9-334
	Tom	Oral	09/08/21	7-84, 6-11
	Wandli	Petition	Unknown	9-334
	William	Postcard	Unknown	7-27, 7-142, 7-129
	XO	Email	10/13/21	9-291
Anonymous Email - 1		Email	07/16/21	7-84
Anonymous Email - 2		Email	07/20/21	8-17, 6-1, 6-3
Anonymous Email - 3		Email	07/26/21	7-52, 5-10, 5-17, 6-5
Anonymous Email - 4		Email	08/10/21	9-291
Anonymous Online Form - 1		Online Form	07/16/21	6-1
Anonymous Online Form - 2		Online Form	07/16/21	6-25
Anonymous Online Form - 3		Online Form	07/16/21	4-1
Anonymous Online Form - 4		Online Form	07/16/21	6-5
Anonymous Online Form - 5		Online Form	07/16/21	4-2
Anonymous Online Form - 6		Online Form	07/16/21	6-33
Anonymous Online Form - 7		Online Form	07/16/21	6-5
Anonymous Online Form - 8		Online Form	07/16/21	5-17
Anonymous Online Form - 9		Online Form	07/16/21	6-3
Anonymous Online Form - 10		Online Form	07/16/21	4-47
Anonymous Online Form - 11		Online Form	07/16/21	7-129
Anonymous Online Form - 12		Online Form	07/16/21	4-2
Anonymous Online Form - 14		Online Form	07/16/21	7-52
Anonymous Online Form - 15		Online Form	07/16/21	4-2
Anonymous Online Form - 16		Online Form	07/16/21	4-2
Anonymous Online Form - 17		Online Form	07/16/21	3-1
Anonymous Online Form - 18		Online Form	07/16/21	3-1
Anonymous Online Form - 19		Online Form	07/16/21	6-1
Anonymous Online Form - 20		Online Form	07/16/21	3-1
Anonymous Online Form - 21		Online Form	07/16/21	3-1
Anonymous Online Form - 22		Online Form	07/16/21	4-1
Anonymous Online Form - 23		Online Form	07/16/21	4-1
Anonymous Online Form - 24		Online Form	07/16/21	4-2
Anonymous Online Form - 25		Online Form	07/16/21	6-3
Anonymous Online Form - 26		Online Form	07/16/21	6-1
Anonymous Online Form - 27		Online Form	07/16/21	6-1
Anonymous Online Form - 28		Online Form	07/16/21	4-2
Anonymous Online Form - 29		Online Form	07/16/21	4-2
Anonymous Online Form - 30		Online Form	07/16/21	4-71
Anonymous Online Form - 31		Online Form	07/16/21	4-104
Anonymous Online Form - 32		Online Form	07/16/21	4-1
Anonymous Online Form - 33		Online Form	07/16/21	7-21
Anonymous Online Form - 34		Online Form	07/16/21	4-2
Anonymous Online Form - 35		Online Form	07/16/21	4-1
Anonymous Online Form - 36		Online Form	07/16/21	6-5
Anonymous Online Form - 37		Online Form	07/16/21	4-2
Anonymous Online Form - 38		Online Form	07/16/21	4-7
Anonymous Online Form - 39		Online Form	07/16/21	3-1
Anonymous Online Form - 40		Online Form	07/16/21	6-3
Anonymous Online Form - 41		Online Form	07/16/21	6-3
Anonymous Online Form - 42		Online Form	07/16/21	6-3, 4-2
Anonymous Online Form - 43		Online Form	07/17/21	7-32
Anonymous Online Form - 44		Online Form	07/17/21	6-1
Anonymous Online Form - 45		Online Form	07/17/21	6-1
Anonymous Online Form - 46		Online Form	07/17/21	4-2
Anonymous Online Form - 47		Online Form	07/17/21	4-2
Anonymous Online Form - 48		Online Form	07/17/21	4-3
Anonymous Online Form - 49		Online Form	07/17/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 50		Online Form	07/17/21	4-2
Anonymous Online Form - 51		Online Form	07/17/21	6-11
Anonymous Online Form - 52		Online Form	07/17/21	2-1
Anonymous Online Form - 53		Online Form	07/17/21	3-1
Anonymous Online Form - 54		Online Form	07/17/21	4-1
Anonymous Online Form - 55		Online Form	07/17/21	5-1
Anonymous Online Form - 56		Online Form	07/17/21	6-1
Anonymous Online Form - 57		Online Form	07/17/21	6-3
Anonymous Online Form - 58		Online Form	07/17/21	6-1
Anonymous Online Form - 59		Online Form	07/17/21	4-87
Anonymous Online Form - 60		Online Form	07/17/21	5-10
Anonymous Online Form - 61		Online Form	07/17/21	6-5
Anonymous Online Form - 62		Online Form	07/18/21	4-2
Anonymous Online Form - 64		Online Form	07/18/21	4-2
Anonymous Online Form - 65		Online Form	07/18/21	6-3
Anonymous Online Form - 66		Online Form	07/18/21	4-55
Anonymous Online Form - 67		Online Form	07/18/21	7-36
Anonymous Online Form - 68		Online Form	07/18/21	2-1
Anonymous Online Form - 69		Online Form	07/18/21	3-1
Anonymous Online Form - 70		Online Form	07/18/21	2-1
Anonymous Online Form - 71		Online Form	07/18/21	5-10
Anonymous Online Form - 72		Online Form	07/18/21	7-2
Anonymous Online Form - 73		Online Form	07/18/21	6-9
Anonymous Online Form - 74		Online Form	07/18/21	4-146
Anonymous Online Form - 75		Online Form	07/18/21	4-2
Anonymous Online Form - 76		Online Form	07/18/21	2-1
Anonymous Online Form - 77		Online Form	07/18/21	2-1
Anonymous Online Form - 78		Online Form	07/18/21	4-2
Anonymous Online Form - 79		Online Form	07/18/21	4-2
Anonymous Online Form - 80		Online Form	07/18/21	4-1
Anonymous Online Form - 81		Online Form	07/18/21	4-2
Anonymous Online Form - 82		Online Form	07/18/21	4-2
Anonymous Online Form - 83		Online Form	07/18/21	6-1
Anonymous Online Form - 84		Online Form	07/18/21	4-2
Anonymous Online Form - 85		Online Form	07/18/21	6-1
Anonymous Online Form - 86		Online Form	07/18/21	2-1
Anonymous Online Form - 87		Online Form	07/18/21	6-1
Anonymous Online Form - 88		Online Form	07/18/21	4-2
Anonymous Online Form - 89		Online Form	07/18/21	4-1
Anonymous Online Form - 90		Online Form	07/18/21	4-2
Anonymous Online Form - 91		Online Form	07/18/21	4-55
Anonymous Online Form - 92		Online Form	07/18/21	4-2
Anonymous Online Form - 93		Online Form	07/18/21	4-55
Anonymous Online Form - 94		Online Form	07/18/21	7-32
Anonymous Online Form - 95		Online Form	07/18/21	7-91
Anonymous Online Form - 96		Online Form	07/18/21	4-2
Anonymous Online Form - 97		Online Form	07/19/21	5-10
Anonymous Online Form - 98		Online Form	07/19/21	4-2
Anonymous Online Form - 99		Online Form	07/19/21	4-55
Anonymous Online Form - 100		Online Form	07/19/21	4-2
Anonymous Online Form - 101		Online Form	07/19/21	6-36
Anonymous Online Form - 102		Online Form	07/19/21	6-3
Anonymous Online Form - 103		Online Form	07/19/21	4-2
Anonymous Online Form - 104		Online Form	07/19/21	4-2
Anonymous Online Form - 105		Online Form	07/19/21	5-19
Anonymous Online Form - 106		Online Form	07/19/21	4-1
Anonymous Online Form - 107		Online Form	07/19/21	6-3
Anonymous Online Form - 108		Online Form	07/19/21	7-32
Anonymous Online Form - 109		Online Form	07/19/21	4-2
Anonymous Online Form - 110		Online Form	07/19/21	4-55
Anonymous Online Form - 111		Online Form	07/19/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 112		Online Form	07/19/21	2-1
Anonymous Online Form - 113		Online Form	07/19/21	7-130
Anonymous Online Form - 114		Online Form	07/19/21	4-2
Anonymous Online Form - 115		Online Form	07/19/21	5-19
Anonymous Online Form - 116		Online Form	07/19/21	3-1
Anonymous Online Form - 117		Online Form	07/19/21	4-56
Anonymous Online Form - 118		Online Form	07/19/21	3-1
Anonymous Online Form - 119		Online Form	07/19/21	3-1
Anonymous Online Form - 120		Online Form	07/19/21	3-1
Anonymous Online Form - 121		Online Form	07/19/21	4-55
Anonymous Online Form - 122		Online Form	07/19/21	3-1
Anonymous Online Form - 123		Online Form	07/19/21	4-55
Anonymous Online Form - 124		Online Form	07/19/21	4-2
Anonymous Online Form - 125		Online Form	07/19/21	4-55
Anonymous Online Form - 126		Online Form	07/19/21	4-2
Anonymous Online Form - 127		Online Form	07/19/21	4-2
Anonymous Online Form - 129		Online Form	07/19/21	6-60
Anonymous Online Form - 130		Online Form	07/19/21	5-10
Anonymous Online Form - 131		Online Form	07/19/21	4-1
Anonymous Online Form - 132		Online Form	07/19/21	4-2
Anonymous Online Form - 133		Online Form	07/19/21	4-55
Anonymous Online Form - 134		Online Form	07/19/21	6-5
Anonymous Online Form - 135		Online Form	07/19/21	4-1
Anonymous Online Form - 136		Online Form	07/20/21	4-1
Anonymous Online Form - 137		Online Form	07/20/21	4-2
Anonymous Online Form - 138		Online Form	07/20/21	2-1
Anonymous Online Form - 139		Online Form	07/20/21	4-2
Anonymous Online Form - 140		Online Form	07/20/21	4-1
Anonymous Online Form - 141		Online Form	07/20/21	3-2
Anonymous Online Form - 142		Online Form	07/20/21	4-1
Anonymous Online Form - 143		Online Form	07/20/21	2-1
Anonymous Online Form - 144		Online Form	07/20/21	4-3
Anonymous Online Form - 145		Online Form	07/20/21	6-3
Anonymous Online Form - 146		Online Form	07/20/21	5-13
Anonymous Online Form - 147		Online Form	07/20/21	4-2
Anonymous Online Form - 148		Online Form	07/20/21	7-9
Anonymous Online Form - 149		Online Form	07/20/21	6-11
Anonymous Online Form - 150		Online Form	07/20/21	6-80
Anonymous Online Form - 151		Online Form	07/20/21	4-2
Anonymous Online Form - 152		Online Form	07/20/21	6-1
Anonymous Online Form - 153		Online Form	07/20/21	2-1
Anonymous Online Form - 154		Online Form	07/20/21	4-2
Anonymous Online Form - 155		Online Form	07/20/21	4-2
Anonymous Online Form - 156		Online Form	07/20/21	6-5
Anonymous Online Form - 157		Online Form	07/20/21	4-5
Anonymous Online Form - 158		Online Form	07/20/21	5-17
Anonymous Online Form - 159		Online Form	07/20/21	4-11
Anonymous Online Form - 160		Online Form	07/20/21	5-1
Anonymous Online Form - 161		Online Form	07/20/21	2-1
Anonymous Online Form - 162		Online Form	07/20/21	2-1
Anonymous Online Form - 163		Online Form	07/20/21	6-47
Anonymous Online Form - 164		Online Form	07/20/21	4-2
Anonymous Online Form - 165		Online Form	07/20/21	4-2
Anonymous Online Form - 166		Online Form	07/20/21	6-1
Anonymous Online Form - 167		Online Form	07/20/21	5-19
Anonymous Online Form - 168		Online Form	07/20/21	5-10
Anonymous Online Form - 169		Online Form	07/20/21	6-1
Anonymous Online Form - 170		Online Form	07/20/21	6-5
Anonymous Online Form - 171		Online Form	07/20/21	6-1
Anonymous Online Form - 172		Online Form	07/20/21	3-1
Anonymous Online Form - 173		Online Form	07/20/21	5-10

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 174		Online Form	07/20/21	6-1
Anonymous Online Form - 175		Online Form	07/20/21	4-1
Anonymous Online Form - 176		Online Form	07/20/21	6-1
Anonymous Online Form - 177		Online Form	07/20/21	4-1
Anonymous Online Form - 178		Online Form	07/20/21	3-1
Anonymous Online Form - 179		Online Form	07/20/21	6-9
Anonymous Online Form - 180		Online Form	07/20/21	2-1
Anonymous Online Form - 181		Online Form	07/20/21	4-1
Anonymous Online Form - 182		Online Form	07/20/21	4-55
Anonymous Online Form - 183		Online Form	07/20/21	7-99
Anonymous Online Form - 184		Online Form	07/20/21	6-5
Anonymous Online Form - 185		Online Form	07/20/21	6-5
Anonymous Online Form - 186		Online Form	07/20/21	3-1
Anonymous Online Form - 186		Online Form	07/20/21	5-10
Anonymous Online Form - 187		Online Form	07/20/21	5-10
Anonymous Online Form - 188		Online Form	07/20/21	3-1
Anonymous Online Form - 189		Online Form	07/21/21	6-3
Anonymous Online Form - 190		Online Form	07/21/21	6-3
Anonymous Online Form - 191		Online Form	07/21/21	6-49
Anonymous Online Form - 192		Online Form	07/21/21	4-1
Anonymous Online Form - 193		Online Form	07/21/21	4-2
Anonymous Online Form - 194		Online Form	07/21/21	7-84
Anonymous Online Form - 195		Online Form	07/21/21	3-1
Anonymous Online Form - 196		Online Form	07/21/21	6-1
Anonymous Online Form - 197		Online Form	07/21/21	3-1
Anonymous Online Form - 198		Online Form	07/21/21	4-77
Anonymous Online Form - 199		Online Form	07/21/21	6-1
Anonymous Online Form - 200		Online Form	07/21/21	4-1
Anonymous Online Form - 201		Online Form	07/21/21	8-3
Anonymous Online Form - 202		Online Form	07/21/21	6-5
Anonymous Online Form - 203		Online Form	07/21/21	2-1
Anonymous Online Form - 204		Online Form	07/21/21	4-2
Anonymous Online Form - 205		Online Form	07/21/21	3-1
Anonymous Online Form - 206		Online Form	07/22/21	6-5
Anonymous Online Form - 207		Online Form	07/22/21	5-10
Anonymous Online Form - 208		Online Form	07/22/21	4-2
Anonymous Online Form - 209		Online Form	07/22/21	4-145
Anonymous Online Form - 210		Online Form	07/22/21	4-2
Anonymous Online Form - 211		Online Form	07/22/21	6-11
Anonymous Online Form - 212		Online Form	07/22/21	4-1
Anonymous Online Form - 213		Online Form	07/22/21	2-1
Anonymous Online Form - 214		Online Form	07/23/21	4-1
Anonymous Online Form - 215		Online Form	07/23/21	4-1
Anonymous Online Form - 216		Online Form	07/23/21	6-51
Anonymous Online Form - 217		Online Form	07/23/21	6-53
Anonymous Online Form - 218		Online Form	07/24/21	4-2
Anonymous Online Form - 219		Online Form	07/24/21	3-1
Anonymous Online Form - 220		Online Form	07/24/21	4-2
Anonymous Online Form - 221		Online Form	07/24/21	3-1
Anonymous Online Form - 222		Online Form	07/24/21	4-2
Anonymous Online Form - 223		Online Form	07/24/21	3-1
Anonymous Online Form - 224		Online Form	07/24/21	4-1
Anonymous Online Form - 225		Online Form	07/24/21	4-2
Anonymous Online Form - 226		Online Form	07/25/21	4-41
Anonymous Online Form - 227		Online Form	07/25/21	4-2
Anonymous Online Form - 228		Online Form	07/26/21	4-1
Anonymous Online Form - 229		Online Form	07/26/21	4-135
Anonymous Online Form - 230		Online Form	07/26/21	4-119
Anonymous Online Form - 231		Online Form	07/27/21	7-139
Anonymous Online Form - 232		Online Form	07/27/21	4-2
Anonymous Online Form - 233		Online Form	07/27/21	6-5

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 234		Online Form	07/27/21	4-2
Anonymous Online Form - 235		Online Form	07/27/21	4-2
Anonymous Online Form - 236		Online Form	07/27/21	8-1
Anonymous Online Form - 237		Online Form	07/28/21	4-1
Anonymous Online Form - 238		Online Form	07/28/21	4-2
Anonymous Online Form - 239		Online Form	07/29/21	4-1
Anonymous Online Form - 240		Online Form	07/29/21	6-11
Anonymous Online Form - 241		Online Form	07/29/21	4-2
Anonymous Online Form - 242		Online Form	07/29/21	4-22
Anonymous Online Form - 243		Online Form	07/30/21	6-1
Anonymous Online Form - 244		Online Form	07/30/21	7-9, 7-129, 4-1
Anonymous Online Form - 246		Online Form	07/30/21	4-2
Anonymous Online Form - 247		Online Form	08/01/21	2-9
Anonymous Online Form - 248		Online Form	08/01/21	5-6
Anonymous Online Form - 249		Online Form	08/01/21	3-1
Anonymous Online Form - 250		Online Form	08/01/21	7-32
Anonymous Online Form - 251		Online Form	08/01/21	6-3
Anonymous Online Form - 253		Online Form	08/02/21	6-1
Anonymous Online Form - 254		Online Form	08/02/21	3-1
Anonymous Online Form - 255		Online Form	08/02/21	6-36
Anonymous Online Form - 256		Online Form	08/02/21	4-135
Anonymous Online Form - 257		Online Form	08/02/21	4-135
Anonymous Online Form - 258		Online Form	08/02/21	4-135
Anonymous Online Form - 259		Online Form	08/02/21	4-135
Anonymous Online Form - 260		Online Form	08/02/21	4-135
Anonymous Online Form - 263		Online Form	08/02/21	4-135
Anonymous Online Form - 264		Online Form	08/02/21	4-135
Anonymous Online Form - 265		Online Form	08/02/21	4-135
Anonymous Online Form - 266		Online Form	08/03/21	6-3
Anonymous Online Form - 267		Online Form	08/03/21	2-1
Anonymous Online Form - 268		Online Form	08/03/21	4-2
Anonymous Online Form - 269		Online Form	08/03/21	4-1
Anonymous Online Form - 270		Online Form	08/03/21	4-135
Anonymous Online Form - 271		Online Form	08/03/21	4-102
Anonymous Online Form - 272		Online Form	08/03/21	4-106
Anonymous Online Form - 273		Online Form	08/03/21	4-47
Anonymous Online Form - 274		Online Form	08/03/21	4-47
Anonymous Online Form - 275		Online Form	08/03/21	4-47
Anonymous Online Form - 276		Online Form	08/03/21	4-1
Anonymous Online Form - 277		Online Form	08/03/21	4-47
Anonymous Online Form - 278		Online Form	08/03/21	4-47
Anonymous Online Form - 279		Online Form	08/03/21	4-47
Anonymous Online Form - 280		Online Form	08/03/21	6-12
Anonymous Online Form - 281		Online Form	08/03/21	4-47
Anonymous Online Form - 282		Online Form	08/04/21	4-47
Anonymous Online Form - 283		Online Form	08/04/21	6-5
Anonymous Online Form - 284		Online Form	08/04/21	6-1
Anonymous Online Form - 285		Online Form	08/04/21	4-135
Anonymous Online Form - 286		Online Form	08/04/21	4-70
Anonymous Online Form - 287		Online Form	08/04/21	4-70
Anonymous Online Form - 288		Online Form	08/04/21	4-135
Anonymous Online Form - 289		Online Form	08/05/21	4-1
Anonymous Online Form - 290		Online Form	08/05/21	4-47
Anonymous Online Form - 291		Online Form	08/05/21	4-1
Anonymous Online Form - 292		Online Form	08/05/21	4-1
Anonymous Online Form - 293		Online Form	08/05/21	4-1
Anonymous Online Form - 294		Online Form	08/06/21	3-1
Anonymous Online Form - 295		Online Form	08/06/21	4-1
Anonymous Online Form - 296		Online Form	08/06/21	4-1
Anonymous Online Form - 297		Online Form	08/06/21	4-135
Anonymous Online Form - 298		Online Form	08/06/21	4-135

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 299		Online Form	08/06/21	4-135
Anonymous Online Form - 300		Online Form	08/06/21	4-135
Anonymous Online Form - 301		Online Form	08/06/21	4-135
Anonymous Online Form - 302		Online Form	08/06/21	4-135
Anonymous Online Form - 303		Online Form	08/06/21	4-135
Anonymous Online Form - 304		Online Form	08/06/21	4-135
Anonymous Online Form - 305		Online Form	08/06/21	4-135
Anonymous Online Form - 306		Online Form	08/06/21	4-135
Anonymous Online Form - 307		Online Form	08/06/21	4-135
Anonymous Online Form - 308		Online Form	08/06/21	4-135
Anonymous Online Form - 309		Online Form	08/07/21	4-135
Anonymous Online Form - 310		Online Form	08/07/21	4-47
Anonymous Online Form - 311		Online Form	08/07/21	4-135
Anonymous Online Form - 312		Online Form	08/07/21	4-135
Anonymous Online Form - 313		Online Form	08/07/21	4-135
Anonymous Online Form - 314		Online Form	08/07/21	4-2
Anonymous Online Form - 315		Online Form	08/07/21	4-1
Anonymous Online Form - 316		Online Form	08/08/21	5-10
Anonymous Online Form - 317		Online Form	08/08/21	4-135
Anonymous Online Form - 318		Online Form	08/08/21	4-47
Anonymous Online Form - 319		Online Form	08/08/21	8-2
Anonymous Online Form - 320		Online Form	08/08/21	4-47
Anonymous Online Form - 321		Online Form	08/08/21	6-1
Anonymous Online Form - 322		Online Form	08/08/21	4-47
Anonymous Online Form - 323		Online Form	08/08/21	4-47
Anonymous Online Form - 324		Online Form	08/08/21	5-10
Anonymous Online Form - 325		Online Form	08/09/21	4-1
Anonymous Online Form - 326		Online Form	08/09/21	6-5
Anonymous Online Form - 327		Online Form	08/09/21	6-1
Anonymous Online Form - 328		Online Form	08/09/21	3-1
Anonymous Online Form - 329		Online Form	08/09/21	4-135
Anonymous Online Form - 330		Online Form	08/09/21	4-47
Anonymous Online Form - 331		Online Form	08/09/21	3-1
Anonymous Online Form - 332		Online Form	08/09/21	2-1
Anonymous Online Form - 333		Online Form	08/09/21	4-2
Anonymous Online Form - 334		Online Form	08/09/21	4-2
Anonymous Online Form - 335		Online Form	08/09/21	3-1
Anonymous Online Form - 336		Online Form	08/09/21	3-1
Anonymous Online Form - 337		Online Form	08/09/21	6-5
Anonymous Online Form - 338		Online Form	08/09/21	6-5
Anonymous Online Form - 339		Online Form	08/09/21	5-17
Anonymous Online Form - 340		Online Form	08/09/21	4-2
Anonymous Online Form - 341		Online Form	08/09/21	6-1
Anonymous Online Form - 342		Online Form	08/09/21	6-1
Anonymous Online Form - 343		Online Form	08/09/21	4-2
Anonymous Online Form - 344		Online Form	07/16/21	5-23
Anonymous Online Form - 345		Online Form	08/09/21	2-1
Anonymous Online Form - 346		Online Form	08/09/21	4-2
Anonymous Online Form - 347		Online Form	08/09/21	6-3
Anonymous Online Form - 348		Online Form	08/09/21	5-17
Anonymous Online Form - 349		Online Form	08/09/21	3-1
Anonymous Online Form - 350		Online Form	08/09/21	4-2
Anonymous Online Form - 351		Online Form	08/09/21	4-36
Anonymous Online Form - 352		Online Form	08/09/21	4-2
Anonymous Online Form - 353		Online Form	08/09/21	3-1
Anonymous Online Form - 354		Online Form	08/09/21	4-47
Anonymous Online Form - 355		Online Form	08/09/21	3-1
Anonymous Online Form - 356		Online Form	08/09/21	4-2
Anonymous Online Form - 357		Online Form	08/09/21	6-3
Anonymous Online Form - 358		Online Form	08/09/21	6-5
Anonymous Online Form - 359		Online Form	08/09/21	3-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 360		Online Form	08/10/21	5-10
Anonymous Online Form - 361		Online Form	08/10/21	5-10
Anonymous Online Form - 362		Online Form	08/10/21	4-1
Anonymous Online Form - 363		Online Form	08/10/21	4-47
Anonymous Online Form - 364		Online Form	08/10/21	3-1
Anonymous Online Form - 365		Online Form	08/11/21	3-1
Anonymous Online Form - 366		Online Form	08/11/21	6-1
Anonymous Online Form - 367		Online Form	08/11/21	6-3
Anonymous Online Form - 368		Online Form	08/11/21	5-10
Anonymous Online Form - 369		Online Form	08/11/21	3-1
Anonymous Online Form - 370		Online Form	08/11/21	4-1
Anonymous Online Form - 371		Online Form	08/11/21	5-10
Anonymous Online Form - 372		Online Form	08/12/21	8-12, 8-1
Anonymous Online Form - 373		Online Form	08/12/21	8-12, 8-1
Anonymous Online Form - 374		Online Form	08/12/21	4-2
Anonymous Online Form - 375		Online Form	08/12/21	6-11
Anonymous Online Form - 376		Online Form	08/12/21	4-2
Anonymous Online Form - 377		Online Form	08/12/21	7-21
Anonymous Online Form - 378		Online Form	08/12/21	4-2
Anonymous Online Form - 379		Online Form	08/12/21	6-5
Anonymous Online Form - 380		Online Form	08/12/21	4-55
Anonymous Online Form - 381		Online Form	08/12/21	6-1
Anonymous Online Form - 382		Online Form	08/12/21	4-49
Anonymous Online Form - 383		Online Form	08/12/21	6-1
Anonymous Online Form - 384		Online Form	08/13/21	6-1
Anonymous Online Form - 385		Online Form	08/13/21	2-1
Anonymous Online Form - 386		Online Form	08/13/21	4-2
Anonymous Online Form - 387		Online Form	08/13/21	6-11
Anonymous Online Form - 388		Online Form	08/13/21	2-1
Anonymous Online Form - 389		Online Form	08/13/21	6-1
Anonymous Online Form - 390		Online Form	08/13/21	4-47
Anonymous Online Form - 391		Online Form	08/14/21	5-19
Anonymous Online Form - 392		Online Form	08/14/21	6-1
Anonymous Online Form - 393		Online Form	08/14/21	4-131
Anonymous Online Form - 394		Online Form	08/14/21	7-129
Anonymous Online Form - 395		Online Form	08/14/21	3-2
Anonymous Online Form - 396		Online Form	08/14/21	4-1
Anonymous Online Form - 397		Online Form	08/14/21	4-131
Anonymous Online Form - 398		Online Form	08/14/21	7-129
Anonymous Online Form - 399		Online Form	08/14/21	7-129
Anonymous Online Form - 400		Online Form	08/14/21	4-1
Anonymous Online Form - 401		Online Form	08/14/21	4-1
Anonymous Online Form - 402		Online Form	08/14/21	7-129
Anonymous Online Form - 403		Online Form	08/14/21	4-131
Anonymous Online Form - 404		Online Form	08/14/21	4-131
Anonymous Online Form - 405		Online Form	08/14/21	4-131
Anonymous Online Form - 406		Online Form	08/14/21	4-131
Anonymous Online Form - 407		Online Form	08/14/21	3-2
Anonymous Online Form - 408		Online Form	08/14/21	5-13
Anonymous Online Form - 409		Online Form	08/14/21	4-1
Anonymous Online Form - 410		Online Form	08/14/21	4-131
Anonymous Online Form - 411		Online Form	08/14/21	3-1
Anonymous Online Form - 412		Online Form	08/14/21	4-2
Anonymous Online Form - 413		Online Form	08/14/21	4-47
Anonymous Online Form - 414		Online Form	08/14/21	4-55
Anonymous Online Form - 415		Online Form	08/16/21	6-5
Anonymous Online Form - 416		Online Form	08/16/21	2-1
Anonymous Online Form - 417		Online Form	08/16/21	5-10
Anonymous Online Form - 418		Online Form	08/16/21	6-3
Anonymous Online Form - 419		Online Form	08/16/21	6-1
Anonymous Online Form - 420		Online Form	08/16/21	5-17

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 421		Online Form	08/16/21	6-1
Anonymous Online Form - 422		Online Form	08/16/21	4-2
Anonymous Online Form - 423		Online Form	08/16/21	4-47
Anonymous Online Form - 424		Online Form	08/16/21	6-1
Anonymous Online Form - 425		Online Form	08/16/21	7-99
Anonymous Online Form - 426		Online Form	08/16/21	6-3
Anonymous Online Form - 427		Online Form	08/16/21	6-2
Anonymous Online Form - 428		Online Form	08/16/21	6-2
Anonymous Online Form - 429		Online Form	08/16/21	6-2
Anonymous Online Form - 430		Online Form	08/17/21	3-1
Anonymous Online Form - 431		Online Form	08/17/21	6-11
Anonymous Online Form - 432		Online Form	08/17/21	6-3
Anonymous Online Form - 433		Online Form	08/17/21	4-2
Anonymous Online Form - 434		Online Form	08/17/21	5-10
Anonymous Online Form - 435		Online Form	08/17/21	4-2
Anonymous Online Form - 436		Online Form	08/17/21	4-1
Anonymous Online Form - 437		Online Form	08/17/21	4-2
Anonymous Online Form - 438		Online Form	08/17/21	4-2
Anonymous Online Form - 439		Online Form	08/17/21	7-99
Anonymous Online Form - 440		Online Form	08/17/21	3-2
Anonymous Online Form - 441		Online Form	08/17/21	6-1
Anonymous Online Form - 442		Online Form	08/17/21	4-2
Anonymous Online Form - 443		Online Form	08/17/21	4-2
Anonymous Online Form - 444		Online Form	08/17/21	6-5
Anonymous Online Form - 445		Online Form	08/17/21	7-52
Anonymous Online Form - 446		Online Form	08/17/21	6-1
Anonymous Online Form - 447		Online Form	08/17/21	7-54
Anonymous Online Form - 448		Online Form	08/17/21	7-111
Anonymous Online Form - 449		Online Form	08/17/21	4-75
Anonymous Online Form - 450		Online Form	08/17/21	7-129
Anonymous Online Form - 451		Online Form	08/17/21	2-1
Anonymous Online Form - 452		Online Form	08/17/21	6-1
Anonymous Online Form - 453		Online Form	08/17/21	4-102
Anonymous Online Form - 454		Online Form	08/17/21	7-52
Anonymous Online Form - 455		Online Form	08/17/21	4-1
Anonymous Online Form - 456		Online Form	08/17/21	7-129
Anonymous Online Form - 457		Online Form	08/17/21	4-2
Anonymous Online Form - 458		Online Form	08/17/21	4-47
Anonymous Online Form - 459		Online Form	08/17/21	4-1
Anonymous Online Form - 460		Online Form	08/17/21	6-3
Anonymous Online Form - 461		Online Form	08/17/21	6-11
Anonymous Online Form - 462		Online Form	08/17/21	4-1
Anonymous Online Form - 463		Online Form	08/17/21	3-1
Anonymous Online Form - 464		Online Form	08/17/21	7-1
Anonymous Online Form - 465		Online Form	08/17/21	7-52
Anonymous Online Form - 466		Online Form	08/17/21	6-1
Anonymous Online Form - 467		Online Form	08/18/21	4-2
Anonymous Online Form - 468		Online Form	08/18/21	5-10
Anonymous Online Form - 469		Online Form	08/18/21	4-2
Anonymous Online Form - 470		Online Form	08/18/21	4-1
Anonymous Online Form - 471		Online Form	08/18/21	4-139
Anonymous Online Form - 472		Online Form	08/18/21	4-2
Anonymous Online Form - 473		Online Form	08/18/21	4-1
Anonymous Online Form - 474		Online Form	08/18/21	4-47
Anonymous Online Form - 475		Online Form	08/18/21	4-2
Anonymous Online Form - 476		Online Form	08/18/21	4-2
Anonymous Online Form - 477		Online Form	08/18/21	4-2
Anonymous Online Form - 478		Online Form	08/18/21	4-2
Anonymous Online Form - 479		Online Form	08/18/21	7-129
Anonymous Online Form - 480		Online Form	08/19/21	4-3
Anonymous Online Form - 481		Online Form	08/19/21	6-5

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment		Response Number(s)
		Type	Date	
Anonymous Online Form - 482		Online Form	08/19/21	4-1
Anonymous Online Form - 483		Online Form	08/20/21	3-1
Anonymous Online Form - 484		Online Form	08/20/21	4-61
Anonymous Online Form - 485		Online Form	08/21/21	4-2
Anonymous Online Form - 486		Online Form	08/21/21	4-47
Anonymous Online Form - 487		Online Form	08/22/21	5-10
Anonymous Online Form - 488		Online Form	08/22/21	4-1
Anonymous Online Form - 489		Online Form	08/22/21	4-1
Anonymous Online Form - 490		Online Form	08/23/21	4-1
Anonymous Online Form - 491		Online Form	08/23/21	2-1
Anonymous Online Form - 492		Online Form	08/23/21	6-32
Anonymous Online Form - 493		Online Form	08/23/21	4-61
Anonymous Online Form - 494		Online Form	08/23/21	6-16
Anonymous Online Form - 495		Online Form	08/24/21	4-55
Anonymous Online Form - 496		Online Form	08/24/21	9-291
Anonymous Online Form - 497		Online Form	08/24/21	9-291
Anonymous Online Form - 498		Online Form	08/24/21	9-291
Anonymous Online Form - 499		Online Form	08/24/21	9-291
Anonymous Online Form - 500		Online Form	08/24/21	4-53
Anonymous Online Form - 501		Online Form	08/24/21	7-51
Anonymous Online Form - 502		Online Form	08/25/21	4-145
Anonymous Online Form - 503		Online Form	08/25/21	4-4
Anonymous Online Form - 504		Online Form	08/27/21	3-1
Anonymous Online Form - 505		Online Form	08/27/21	4-1
Anonymous Online Form - 506		Online Form	08/27/21	4-3
Anonymous Online Form - 507		Online Form	08/27/21	5-10
Anonymous Online Form - 508		Online Form	08/27/21	5-10
Anonymous Online Form - 509		Online Form	08/27/21	4-2
Anonymous Online Form - 510		Online Form	08/27/21	5-10
Anonymous Online Form - 511		Online Form	08/27/21	7-85
Anonymous Online Form - 512		Online Form	08/28/21	5-10
Anonymous Online Form - 513		Online Form	08/29/21	3-1
Anonymous Online Form - 514		Online Form	08/30/21	3-1
Anonymous Online Form - 515		Online Form	08/30/21	4-2
Anonymous Online Form - 516		Online Form	08/30/21	3-1
Anonymous Online Form - 517		Online Form	08/30/21	6-6
Anonymous Online Form - 518		Online Form	08/30/21	5-19
Anonymous Online Form - 519		Online Form	08/30/21	4-2
Anonymous Online Form - 520		Online Form	08/30/21	4-1
Anonymous Online Form - 521		Online Form	08/31/21	4-55
Anonymous Online Form - 522		Online Form	08/31/21	4-55
Anonymous Online Form - 523		Online Form	08/31/21	4-1
Anonymous Online Form - 524		Online Form	08/31/21	4-1
Anonymous Online Form - 525		Online Form	08/31/21	4-1
Anonymous Online Form - 526		Online Form	09/01/21	3-1
Anonymous Online Form - 527		Online Form	09/01/21	4-1
Anonymous Online Form - 528		Online Form	09/01/21	7-85
Anonymous Online Form - 529		Online Form	09/01/21	2-8
Anonymous Online Form - 530		Online Form	09/01/21	5-10
Anonymous Online Form - 531		Online Form	09/01/21	5-19
Anonymous Online Form - 532		Online Form	09/01/21	3-1
Anonymous Online Form - 533		Online Form	09/01/21	4-1
Anonymous Online Form - 534		Online Form	09/01/21	6-3
Anonymous Online Form - 535		Online Form	09/01/21	4-55
Anonymous Online Form - 536		Online Form	09/01/21	6-3
Anonymous Online Form - 537		Online Form	09/01/21	4-2
Anonymous Online Form - 538		Online Form	09/01/21	8-1
Anonymous Online Form - 539		Online Form	09/01/21	3-1
Anonymous Online Form - 540		Online Form	09/01/21	3-1
Anonymous Online Form - 541		Online Form	09/01/21	4-2
Anonymous Online Form - 542		Online Form	09/01/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 543		Online Form	09/01/21	4-1
Anonymous Online Form - 544		Online Form	09/01/21	4-2
Anonymous Online Form - 545		Online Form	09/01/21	4-2
Anonymous Online Form - 546		Online Form	09/01/21	6-28, 6-13
Anonymous Online Form - 547		Online Form	09/01/21	6-1
Anonymous Online Form - 548		Online Form	09/01/21	4-2
Anonymous Online Form - 549		Online Form	09/01/21	8-3
Anonymous Online Form - 550		Online Form	09/01/21	4-96
Anonymous Online Form - 551		Online Form	09/02/21	6-3
Anonymous Online Form - 552		Online Form	09/02/21	4-2
Anonymous Online Form - 553		Online Form	09/02/21	4-2
Anonymous Online Form - 554		Online Form	09/02/21	4-2
Anonymous Online Form - 555		Online Form	09/02/21	4-1
Anonymous Online Form - 556		Online Form	09/02/21	3-1
Anonymous Online Form - 557		Online Form	09/02/21	3-1
Anonymous Online Form - 558		Online Form	09/02/21	7-24
Anonymous Online Form - 559		Online Form	09/02/21	4-1
Anonymous Online Form - 560		Online Form	09/02/21	6-3
Anonymous Online Form - 561		Online Form	09/02/21	3-1
Anonymous Online Form - 562		Online Form	09/02/21	3-1
Anonymous Online Form - 563		Online Form	09/03/21	6-1
Anonymous Online Form - 564		Online Form	09/03/21	4-1
Anonymous Online Form - 565		Online Form	09/03/21	3-1
Anonymous Online Form - 566		Online Form	09/03/21	4-1
Anonymous Online Form - 567		Online Form	09/03/21	5-13
Anonymous Online Form - 568		Online Form	09/03/21	6-1
Anonymous Online Form - 569		Online Form	09/03/21	4-70
Anonymous Online Form - 570		Online Form	09/03/21	4-2
Anonymous Online Form - 571		Online Form	09/03/21	4-1
Anonymous Online Form - 572		Online Form	09/03/21	4-47
Anonymous Online Form - 573		Online Form	09/03/21	9-291
Anonymous Online Form - 574		Online Form	09/03/21	4-61
Anonymous Online Form - 575		Online Form	09/03/21	4-47
Anonymous Online Form - 576		Online Form	09/05/21	4-1
Anonymous Online Form - 577		Online Form	09/05/21	3-1
Anonymous Online Form - 578		Online Form	09/06/21	8-1
Anonymous Online Form - 579		Online Form	09/06/21	4-4
Anonymous Online Form - 580		Online Form	09/06/21	2-1
Anonymous Online Form - 581		Online Form	09/07/21	4-2
Anonymous Online Form - 582		Online Form	09/07/21	4-1
Anonymous Online Form - 583		Online Form	09/07/21	4-2
Anonymous Online Form - 584		Online Form	09/07/21	3-1
Anonymous Online Form - 585		Online Form	09/07/21	4-2
Anonymous Online Form - 586		Online Form	09/07/21	2-1
Anonymous Online Form - 587		Online Form	09/08/21	4-47
Anonymous Online Form - 588		Online Form	09/08/21	6-1
Anonymous Online Form - 589		Online Form	09/08/21	4-1
Anonymous Online Form - 590		Online Form	09/08/21	5-17
Anonymous Online Form - 591		Online Form	09/08/21	4-2
Anonymous Online Form - 592		Online Form	09/08/21	6-5
Anonymous Online Form - 593		Online Form	09/08/21	7-99
Anonymous Online Form - 594		Online Form	09/08/21	4-15
Anonymous Online Form - 595		Online Form	09/08/21	6-11
Anonymous Online Form - 596		Online Form	09/08/21	4-2
Anonymous Online Form - 597		Online Form	09/08/21	4-1
Anonymous Online Form - 598		Online Form	09/08/21	3-1
Anonymous Online Form - 599		Online Form	09/08/21	4-2
Anonymous Online Form - 600		Online Form	09/08/21	4-2
Anonymous Online Form - 601		Online Form	09/08/21	4-1
Anonymous Online Form - 602		Online Form	09/08/21	4-2
Anonymous Online Form - 603		Online Form	09/08/21	5-10

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 604		Online Form	09/08/21	3-1
Anonymous Online Form - 605		Online Form	09/08/21	3-1
Anonymous Online Form - 606		Online Form	09/08/21	5-10
Anonymous Online Form - 607		Online Form	09/08/21	5-10
Anonymous Online Form - 608		Online Form	09/08/21	4-2
Anonymous Online Form - 609		Online Form	09/08/21	5-10
Anonymous Online Form - 610		Online Form	09/08/21	4-66, 4-53
Anonymous Online Form - 611		Online Form	09/08/21	3-1
Anonymous Online Form - 612		Online Form	09/08/21	5-10
Anonymous Online Form - 613		Online Form	09/08/21	5-10
Anonymous Online Form - 614		Online Form	09/08/21	5-13
Anonymous Online Form - 615		Online Form	09/08/21	4-2
Anonymous Online Form - 616		Online Form	09/09/21	4-61
Anonymous Online Form - 617		Online Form	09/09/21	3-1
Anonymous Online Form - 618		Online Form	09/09/21	5-10
Anonymous Online Form - 619		Online Form	09/09/21	3-1
Anonymous Online Form - 620		Online Form	09/09/21	5-10
Anonymous Online Form - 621		Online Form	09/09/21	5-19
Anonymous Online Form - 622		Online Form	09/09/21	4-89
Anonymous Online Form - 623		Online Form	09/09/21	3-1
Anonymous Online Form - 624		Online Form	09/09/21	4-2
Anonymous Online Form - 625		Online Form	09/10/21	4-55
Anonymous Online Form - 626		Online Form	09/10/21	4-55
Anonymous Online Form - 627		Online Form	09/10/21	5-17
Anonymous Online Form - 628		Online Form	09/10/21	5-17
Anonymous Online Form - 629		Online Form	09/10/21	5-10
Anonymous Online Form - 630		Online Form	09/10/21	5-10
Anonymous Online Form - 631		Online Form	09/10/21	5-13
Anonymous Online Form - 632		Online Form	09/10/21	5-13
Anonymous Online Form - 633		Online Form	09/10/21	8-3
Anonymous Online Form - 634		Online Form	09/10/21	8-3
Anonymous Online Form - 635		Online Form	09/10/21	4-2
Anonymous Online Form - 636		Online Form	09/10/21	4-2
Anonymous Online Form - 637		Online Form	09/10/21	4-107
Anonymous Online Form - 638		Online Form	09/10/21	4-107
Anonymous Online Form - 639		Online Form	09/10/21	4-2
Anonymous Online Form - 640		Online Form	09/10/21	4-2
Anonymous Online Form - 641		Online Form	09/10/21	4-55
Anonymous Online Form - 642		Online Form	09/10/21	4-55
Anonymous Online Form - 643		Online Form	09/10/21	3-1
Anonymous Online Form - 644		Online Form	09/10/21	3-1
Anonymous Online Form - 645		Online Form	09/10/21	4-55
Anonymous Online Form - 646		Online Form	09/10/21	4-55
Anonymous Online Form - 647		Online Form	09/10/21	4-55
Anonymous Online Form - 648		Online Form	09/10/21	4-55
Anonymous Online Form - 649		Online Form	09/10/21	3-1
Anonymous Online Form - 650		Online Form	09/10/21	3-1
Anonymous Online Form - 651		Online Form	09/10/21	5-17
Anonymous Online Form - 652		Online Form	09/10/21	5-17
Anonymous Online Form - 653		Online Form	09/10/21	4-55
Anonymous Online Form - 654		Online Form	09/10/21	4-55
Anonymous Online Form - 655		Online Form	09/10/21	5-17
Anonymous Online Form - 656		Online Form	09/10/21	5-17
Anonymous Online Form - 657		Online Form	09/10/21	2-1
Anonymous Online Form - 658		Online Form	09/10/21	2-1
Anonymous Online Form - 659		Online Form	09/10/21	4-2
Anonymous Online Form - 660		Online Form	09/10/21	4-2
Anonymous Online Form - 661		Online Form	09/10/21	4-2
Anonymous Online Form - 662		Online Form	09/10/21	4-2
Anonymous Online Form - 663		Online Form	09/11/21	4-2
Anonymous Online Form - 664		Online Form	09/11/21	4-2

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 665		Online Form	09/11/21	3-1
Anonymous Online Form - 666		Online Form	09/11/21	3-1
Anonymous Online Form - 667		Online Form	09/11/21	4-1
Anonymous Online Form - 668		Online Form	09/11/21	4-1
Anonymous Online Form - 669		Online Form	09/12/21	3-1
Anonymous Online Form - 670		Online Form	09/12/21	3-1
Anonymous Online Form - 671		Online Form	09/13/21	4-2
Anonymous Online Form - 672		Online Form	09/13/21	4-2
Anonymous Online Form - 673		Online Form	09/13/21	5-13
Anonymous Online Form - 674		Online Form	09/13/21	5-13
Anonymous Online Form - 675		Online Form	09/13/21	2-1
Anonymous Online Form - 676		Online Form	09/13/21	2-1
Anonymous Online Form - 677		Online Form	09/13/21	4-138
Anonymous Online Form - 678		Online Form	09/13/21	4-138
Anonymous Online Form - 679		Online Form	09/13/21	2-1
Anonymous Online Form - 680		Online Form	09/13/21	2-1
Anonymous Online Form - 681		Online Form	09/13/21	6-11
Anonymous Online Form - 682		Online Form	09/13/21	6-11
Anonymous Online Form - 683		Online Form	09/13/21	7-53
Anonymous Online Form - 684		Online Form	09/13/21	7-53
Anonymous Online Form - 685		Online Form	09/13/21	4-2
Anonymous Online Form - 686		Online Form	09/13/21	4-2
Anonymous Online Form - 687		Online Form	09/13/21	3-1
Anonymous Online Form - 688		Online Form	09/13/21	3-1
Anonymous Online Form - 689		Online Form	09/13/21	4-46
Anonymous Online Form - 690		Online Form	09/13/21	4-46
Anonymous Online Form - 691		Online Form	09/13/21	4-1
Anonymous Online Form - 692		Online Form	09/13/21	4-1
Anonymous Online Form - 693		Online Form	09/13/21	4-102
Anonymous Online Form - 694		Online Form	09/13/21	4-102
Anonymous Online Form - 695		Online Form	09/13/21	4-1
Anonymous Online Form - 696		Online Form	09/13/21	4-1
Anonymous Online Form - 697		Online Form	09/13/21	4-2
Anonymous Online Form - 698		Online Form	09/13/21	4-2
Anonymous Online Form - 699		Online Form	09/14/21	4-33
Anonymous Online Form - 700		Online Form	09/14/21	4-2
Anonymous Online Form - 701		Online Form	09/14/21	4-2
Anonymous Online Form - 702		Online Form	09/14/21	6-5
Anonymous Online Form - 703		Online Form	09/14/21	6-5
Anonymous Online Form - 704		Online Form	09/14/21	4-2
Anonymous Online Form - 705		Online Form	09/14/21	4-2
Anonymous Online Form - 706		Online Form	09/14/21	4-2
Anonymous Online Form - 707		Online Form	09/14/21	4-2
Anonymous Online Form - 708		Online Form	09/14/21	4-2
Anonymous Online Form - 709		Online Form	09/14/21	4-2
Anonymous Online Form - 710		Online Form	09/14/21	4-2
Anonymous Online Form - 711		Online Form	09/14/21	4-2
Anonymous Online Form - 712		Online Form	09/14/21	5-10
Anonymous Online Form - 713		Online Form	09/14/21	5-10
Anonymous Online Form - 714		Online Form	09/14/21	3-1
Anonymous Online Form - 715		Online Form	09/14/21	3-1
Anonymous Online Form - 716		Online Form	09/14/21	2-1
Anonymous Online Form - 717		Online Form	09/14/21	2-1
Anonymous Online Form - 718		Online Form	09/14/21	4-2
Anonymous Online Form - 719		Online Form	09/14/21	4-2
Anonymous Online Form - 720		Online Form	09/14/21	6-1
Anonymous Online Form - 721		Online Form	09/14/21	6-1
Anonymous Online Form - 722		Online Form	09/14/21	4-2
Anonymous Online Form - 723		Online Form	09/14/21	4-2
Anonymous Online Form - 724		Online Form	09/14/21	3-1
Anonymous Online Form - 725		Online Form	09/14/21	3-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 726		Online Form	09/14/21	3-1
Anonymous Online Form - 727		Online Form	09/14/21	3-1
Anonymous Online Form - 728		Online Form	09/14/21	5-10
Anonymous Online Form - 729		Online Form	09/14/21	5-10
Anonymous Online Form - 730		Online Form	09/14/21	2-1
Anonymous Online Form - 731		Online Form	09/14/21	2-1
Anonymous Online Form - 732		Online Form	09/14/21	2-1
Anonymous Online Form - 733		Online Form	09/14/21	2-1
Anonymous Online Form - 734		Online Form	09/14/21	4-2
Anonymous Online Form - 735		Online Form	09/14/21	4-2
Anonymous Online Form - 736		Online Form	09/14/21	4-1
Anonymous Online Form - 737		Online Form	09/14/21	4-1
Anonymous Online Form - 738		Online Form	09/14/21	4-1
Anonymous Online Form - 739		Online Form	09/14/21	4-1
Anonymous Online Form - 740		Online Form	09/14/21	2-1
Anonymous Online Form - 741		Online Form	09/14/21	2-1
Anonymous Online Form - 742		Online Form	09/14/21	5-10
Anonymous Online Form - 743		Online Form	09/14/21	5-10
Anonymous Online Form - 744		Online Form	09/14/21	2-1
Anonymous Online Form - 745		Online Form	09/14/21	2-1
Anonymous Online Form - 746		Online Form	09/14/21	3-1
Anonymous Online Form - 747		Online Form	09/14/21	3-1
Anonymous Online Form - 748		Online Form	09/14/21	4-2
Anonymous Online Form - 749		Online Form	09/14/21	4-2
Anonymous Online Form - 750		Online Form	09/14/21	4-2
Anonymous Online Form - 751		Online Form	09/14/21	4-2
Anonymous Online Form - 752		Online Form	09/14/21	6-9
Anonymous Online Form - 753		Online Form	09/14/21	6-9
Anonymous Online Form - 754		Online Form	09/14/21	4-1
Anonymous Online Form - 755		Online Form	09/14/21	4-1
Anonymous Online Form - 756		Online Form	09/14/21	4-2
Anonymous Online Form - 757		Online Form	09/14/21	4-2
Anonymous Online Form - 758		Online Form	09/14/21	4-100, 4-100
Anonymous Online Form - 759		Online Form	09/14/21	4-55
Anonymous Online Form - 760		Online Form	09/14/21	4-55
Anonymous Online Form - 761		Online Form	09/15/21	6-11
Anonymous Online Form - 762		Online Form	09/15/21	6-11
Anonymous Online Form - 763		Online Form	09/15/21	2-1
Anonymous Online Form - 764		Online Form	09/15/21	2-1
Anonymous Online Form - 765		Online Form	09/15/21	4-2
Anonymous Online Form - 766		Online Form	09/15/21	4-2
Anonymous Online Form - 767		Online Form	09/15/21	5-10
Anonymous Online Form - 768		Online Form	09/15/21	5-10
Anonymous Online Form - 769		Online Form	09/15/21	5-10
Anonymous Online Form - 770		Online Form	09/15/21	5-10
Anonymous Online Form - 771		Online Form	09/15/21	6-1
Anonymous Online Form - 772		Online Form	09/15/21	6-1
Anonymous Online Form - 773		Online Form	09/15/21	6-35
Anonymous Online Form - 774		Online Form	09/15/21	6-35
Anonymous Online Form - 775		Online Form	09/15/21	4-2
Anonymous Online Form - 776		Online Form	09/15/21	4-2
Anonymous Online Form - 777		Online Form	09/15/21	2-1
Anonymous Online Form - 778		Online Form	09/15/21	2-1
Anonymous Online Form - 779		Online Form	09/15/21	3-1
Anonymous Online Form - 780		Online Form	09/15/21	3-1
Anonymous Online Form - 781		Online Form	09/15/21	5-10
Anonymous Online Form - 782		Online Form	09/15/21	5-10
Anonymous Online Form - 783		Online Form	09/15/21	4-2
Anonymous Online Form - 784		Online Form	09/15/21	4-2
Anonymous Online Form - 785		Online Form	09/15/21	4-2
Anonymous Online Form - 786		Online Form	09/15/21	4-2

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment		Response Number(s)
		Type	Date	
Anonymous Online Form - 787		Online Form	09/15/21	6-29
Anonymous Online Form - 788		Online Form	09/15/21	6-29
Anonymous Online Form - 789		Online Form	09/15/21	6-30
Anonymous Online Form - 790		Online Form	09/15/21	6-30
Anonymous Online Form - 791		Online Form	09/15/21	4-95
Anonymous Online Form - 792		Online Form	09/15/21	4-95
Anonymous Online Form - 793		Online Form	09/16/21	7-12
Anonymous Online Form - 794		Online Form	09/16/21	7-12
Anonymous Online Form - 795		Online Form	09/16/21	6-1
Anonymous Online Form - 796		Online Form	09/16/21	6-1
Anonymous Online Form - 797		Online Form	09/17/21	5-10
Anonymous Online Form - 798		Online Form	09/17/21	5-10
Anonymous Online Form - 799		Online Form	09/17/21	7-115
Anonymous Online Form - 800		Online Form	09/17/21	7-115
Anonymous Online Form - 801		Online Form	09/18/21	4-2
Anonymous Online Form - 802		Online Form	09/18/21	4-2
Anonymous Online Form - 803		Online Form	09/20/21	4-47
Anonymous Online Form - 804		Online Form	09/20/21	4-47
Anonymous Online Form - 805		Online Form	09/21/21	4-47
Anonymous Online Form - 806		Online Form	09/21/21	4-47
Anonymous Online Form - 807		Online Form	09/21/21	4-47
Anonymous Online Form - 808		Online Form	09/21/21	4-47
Anonymous Online Form - 809		Online Form	09/21/21	6-3
Anonymous Online Form - 810		Online Form	09/21/21	6-3
Anonymous Online Form - 811		Online Form	09/21/21	4-47
Anonymous Online Form - 812		Online Form	09/21/21	4-47
Anonymous Online Form - 813		Online Form	09/21/21	3-1
Anonymous Online Form - 814		Online Form	09/21/21	3-1
Anonymous Online Form - 815		Online Form	09/21/21	4-17
Anonymous Online Form - 816		Online Form	09/21/21	4-17
Anonymous Online Form - 817		Online Form	09/22/21	4-2
Anonymous Online Form - 818		Online Form	09/22/21	4-2
Anonymous Online Form - 819		Online Form	09/22/21	4-2
Anonymous Online Form - 820		Online Form	09/22/21	4-2
Anonymous Online Form - 821		Online Form	09/22/21	4-2
Anonymous Online Form - 822		Online Form	09/22/21	4-2
Anonymous Online Form - 823		Online Form	09/22/21	8-1
Anonymous Online Form - 824		Online Form	09/22/21	8-1
Anonymous Online Form - 825		Online Form	09/22/21	5-10
Anonymous Online Form - 826		Online Form	09/22/21	5-10
Anonymous Online Form - 827		Online Form	09/22/21	4-2
Anonymous Online Form - 828		Online Form	09/22/21	2-1
Anonymous Online Form - 829		Online Form	09/22/21	6-8
Anonymous Online Form - 830		Online Form	09/22/21	6-8
Anonymous Online Form - 831		Online Form	09/22/21	4-2
Anonymous Online Form - 832		Online Form	09/22/21	4-2
Anonymous Online Form - 833		Online Form	09/22/21	5-10
Anonymous Online Form - 834		Online Form	09/22/21	5-10
Anonymous Online Form - 835		Online Form	09/22/21	4-47
Anonymous Online Form - 836		Online Form	09/22/21	4-47
Anonymous Online Form - 837		Online Form	09/22/21	7-80
Anonymous Online Form - 838		Online Form	09/22/21	7-80
Anonymous Online Form - 839		Online Form	09/22/21	3-1
Anonymous Online Form - 840		Online Form	09/22/21	3-1
Anonymous Online Form - 841		Online Form	09/22/21	2-1
Anonymous Online Form - 842		Online Form	09/22/21	2-1
Anonymous Online Form - 843		Online Form	09/22/21	2-1
Anonymous Online Form - 844		Online Form	09/22/21	2-1
Anonymous Online Form - 845		Online Form	09/22/21	4-1
Anonymous Online Form - 846		Online Form	09/22/21	4-1
Anonymous Online Form - 847		Online Form	09/23/21	4-2

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 848		Online Form	09/23/21	4-2
Anonymous Online Form - 849		Online Form	09/23/21	5-17
Anonymous Online Form - 850		Online Form	09/23/21	5-17
Anonymous Online Form - 851		Online Form	09/23/21	5-10
Anonymous Online Form - 852		Online Form	09/23/21	5-10
Anonymous Online Form - 853		Online Form	09/23/21	3-2
Anonymous Online Form - 854		Online Form	09/23/21	3-2
Anonymous Online Form - 855		Online Form	09/23/21	3-1
Anonymous Online Form - 856		Online Form	09/23/21	3-1
Anonymous Online Form - 857		Online Form	09/23/21	4-2
Anonymous Online Form - 858		Online Form	09/23/21	4-2
Anonymous Online Form - 859		Online Form	09/23/21	6-9
Anonymous Online Form - 860		Online Form	09/23/21	6-9
Anonymous Online Form - 861		Online Form	09/23/21	6-9
Anonymous Online Form - 862		Online Form	09/23/21	6-9
Anonymous Online Form - 863		Online Form	09/23/21	4-2
Anonymous Online Form - 864		Online Form	09/23/21	4-2
Anonymous Online Form - 865		Online Form	09/23/21	4-47
Anonymous Online Form - 866		Online Form	09/23/21	4-47
Anonymous Online Form - 867		Online Form	09/23/21	7-103
Anonymous Online Form - 868		Online Form	09/23/21	7-103
Anonymous Online Form - 869		Online Form	09/24/21	7-14
Anonymous Online Form - 870		Online Form	09/24/21	7-14
Anonymous Online Form - 871		Online Form	09/24/21	7-20
Anonymous Online Form - 872		Online Form	09/24/21	7-20
Anonymous Online Form - 873		Online Form	09/24/21	4-2
Anonymous Online Form - 874		Online Form	09/24/21	4-2
Anonymous Online Form - 875		Online Form	09/24/21	4-1
Anonymous Online Form - 876		Online Form	09/24/21	4-1
Anonymous Online Form - 877		Online Form	09/26/21	4-1
Anonymous Online Form - 878		Online Form	09/26/21	4-1
Anonymous Online Form - 879		Online Form	09/27/21	4-1
Anonymous Online Form - 880		Online Form	09/27/21	4-1
Anonymous Online Form - 881		Online Form	09/27/21	2-7
Anonymous Online Form - 882		Online Form	09/27/21	2-7
Anonymous Online Form - 883		Online Form	09/28/21	6-5
Anonymous Online Form - 884		Online Form	09/28/21	6-5
Anonymous Online Form - 885		Online Form	09/29/21	3-1
Anonymous Online Form - 886		Online Form	09/29/21	3-1
Anonymous Online Form - 887		Online Form	09/30/21	4-2
Anonymous Online Form - 888		Online Form	09/30/21	4-2
Anonymous Online Form - 889		Online Form	09/30/21	4-1
Anonymous Online Form - 890		Online Form	09/30/21	4-1
Anonymous Online Form - 891		Online Form	10/01/21	4-2
Anonymous Online Form - 892		Online Form	10/01/21	4-2
Anonymous Online Form - 893		Online Form	10/01/21	4-1
Anonymous Online Form - 894		Online Form	10/01/21	2-1
Anonymous Online Form - 895		Online Form	10/03/21	6-1
Anonymous Online Form - 896		Online Form	10/03/21	5-10
Anonymous Online Form - 897		Online Form	10/04/21	3-1
Anonymous Online Form - 898		Online Form	10/04/21	6-5
Anonymous Online Form - 899		Online Form	10/04/21	3-1
Anonymous Online Form - 900		Online Form	10/04/21	6-11
Anonymous Online Form - 901		Online Form	10/04/21	5-10
Anonymous Online Form - 902		Online Form	10/04/21	3-1
Anonymous Online Form - 903		Online Form	10/04/21	5-10
Anonymous Online Form - 904		Online Form	10/04/21	4-2
Anonymous Online Form - 905		Online Form	10/04/21	5-10
Anonymous Online Form - 906		Online Form	10/04/21	3-1
Anonymous Online Form - 907		Online Form	10/04/21	5-10
Anonymous Online Form - 908		Online Form	10/04/21	3-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 909		Online Form	10/04/21	4-2
Anonymous Online Form - 910		Online Form	10/04/21	2-1
Anonymous Online Form - 911		Online Form	10/04/21	5-10
Anonymous Online Form - 912		Online Form	10/04/21	4-2
Anonymous Online Form - 913		Online Form	10/04/21	3-1
Anonymous Online Form - 914		Online Form	10/04/21	3-1
Anonymous Online Form - 915		Online Form	10/04/21	3-1
Anonymous Online Form - 916		Online Form	10/04/21	6-8
Anonymous Online Form - 917		Online Form	10/04/21	3-1
Anonymous Online Form - 918		Online Form	10/04/21	4-2
Anonymous Online Form - 919		Online Form	10/05/21	2-1
Anonymous Online Form - 920		Online Form	10/05/21	5-10
Anonymous Online Form - 921		Online Form	10/05/21	6-1
Anonymous Online Form - 922		Online Form	10/05/21	4-2
Anonymous Online Form - 923		Online Form	10/05/21	5-10
Anonymous Online Form - 924		Online Form	10/05/21	4-2
Anonymous Online Form - 925		Online Form	10/05/21	5-10
Anonymous Online Form - 926		Online Form	10/05/21	6-1
Anonymous Online Form - 927		Online Form	10/05/21	4-2
Anonymous Online Form - 928		Online Form	10/05/21	4-2
Anonymous Online Form - 929		Online Form	10/05/21	4-2
Anonymous Online Form - 930		Online Form	10/05/21	5-10
Anonymous Online Form - 931		Online Form	10/05/21	4-2
Anonymous Online Form - 932		Online Form	10/05/21	3-1
Anonymous Online Form - 933		Online Form	10/05/21	4-2
Anonymous Online Form - 934		Online Form	10/05/21	4-1
Anonymous Online Form - 935		Online Form	10/06/21	5-10
Anonymous Online Form - 936		Online Form	10/06/21	5-10
Anonymous Online Form - 937		Online Form	10/06/21	4-2
Anonymous Online Form - 938		Online Form	10/06/21	3-1
Anonymous Online Form - 939		Online Form	10/06/21	6-1
Anonymous Online Form - 940		Online Form	10/06/21	3-1
Anonymous Online Form - 941		Online Form	10/07/21	4-2
Anonymous Online Form - 942		Online Form	10/07/21	5-10
Anonymous Online Form - 943		Online Form	10/07/21	4-1
Anonymous Online Form - 944		Online Form	10/07/21	4-55
Anonymous Online Form - 945		Online Form	10/07/21	6-11
Anonymous Online Form - 946		Online Form	10/07/21	5-10
Anonymous Online Form - 947		Online Form	10/07/21	4-1
Anonymous Online Form - 948		Online Form	10/07/21	4-61
Anonymous Online Form - 949		Online Form	10/07/21	8-3
Anonymous Online Form - 950		Online Form	10/07/21	8-3
Anonymous Online Form - 951		Online Form	10/07/21	6-1
Anonymous Online Form - 952		Online Form	10/07/21	3-2
Anonymous Online Form - 953		Online Form	10/07/21	6-5
Anonymous Online Form - 954		Online Form	10/07/21	6-5
Anonymous Online Form - 955		Online Form	10/07/21	3-1
Anonymous Online Form - 956		Online Form	10/07/21	4-2
Anonymous Online Form - 957		Online Form	10/07/21	4-2
Anonymous Online Form - 958		Online Form	10/07/21	5-13
Anonymous Online Form - 959		Online Form	10/07/21	2-1
Anonymous Online Form - 960		Online Form	10/07/21	5-19
Anonymous Online Form - 961		Online Form	10/07/21	3-1
Anonymous Online Form - 962		Online Form	10/07/21	2-1
Anonymous Online Form - 963		Online Form	10/07/21	4-2
Anonymous Online Form - 964		Online Form	10/07/21	4-2
Anonymous Online Form - 965		Online Form	10/07/21	3-1
Anonymous Online Form - 966		Online Form	10/07/21	4-61
Anonymous Online Form - 967		Online Form	10/07/21	5-13
Anonymous Online Form - 968		Online Form	10/07/21	4-61
Anonymous Online Form - 969		Online Form	10/07/21	3-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 970		Online Form	10/07/21	6-5
Anonymous Online Form - 971		Online Form	10/07/21	4-145
Anonymous Online Form - 972		Online Form	10/07/21	8-1
Anonymous Online Form - 973		Online Form	10/07/21	4-2
Anonymous Online Form - 974		Online Form	10/07/21	7-62
Anonymous Online Form - 975		Online Form	10/07/21	7-62
Anonymous Online Form - 976		Online Form	10/07/21	4-2
Anonymous Online Form - 977		Online Form	10/07/21	4-104
Anonymous Online Form - 978		Online Form	10/07/21	3-1
Anonymous Online Form - 979		Online Form	10/07/21	8-3
Anonymous Online Form - 980		Online Form	10/07/21	7-52
Anonymous Online Form - 981		Online Form	10/07/21	2-1
Anonymous Online Form - 982		Online Form	10/07/21	7-52
Anonymous Online Form - 983		Online Form	10/07/21	7-52
Anonymous Online Form - 984		Online Form	10/07/21	2-1
Anonymous Online Form - 985		Online Form	10/07/21	4-2
Anonymous Online Form - 986		Online Form	10/07/21	2-1
Anonymous Online Form - 987		Online Form	10/07/21	5-10
Anonymous Online Form - 988		Online Form	10/07/21	3-1
Anonymous Online Form - 989		Online Form	10/07/21	4-2
Anonymous Online Form - 990		Online Form	10/07/21	5-17
Anonymous Online Form - 991		Online Form	10/07/21	4-5
Anonymous Online Form - 992		Online Form	10/07/21	5-10
Anonymous Online Form - 993		Online Form	10/07/21	6-1
Anonymous Online Form - 994		Online Form	10/07/21	4-2
Anonymous Online Form - 995		Online Form	10/07/21	7-32
Anonymous Online Form - 996		Online Form	10/07/21	6-26
Anonymous Online Form - 997		Online Form	10/07/21	2-1
Anonymous Online Form - 998		Online Form	10/08/21	2-1
Anonymous Online Form - 999		Online Form	10/08/21	7-52
Anonymous Online Form - 1000		Online Form	10/08/21	2-1
Anonymous Online Form - 1001		Online Form	10/08/21	4-2
Anonymous Online Form - 1002		Online Form	10/08/21	6-9
Anonymous Online Form - 1003		Online Form	10/08/21	3-1
Anonymous Online Form - 1004		Online Form	10/08/21	5-10
Anonymous Online Form - 1005		Online Form	10/08/21	2-1
Anonymous Online Form - 1006		Online Form	10/08/21	5-10
Anonymous Online Form - 1007		Online Form	10/08/21	6-25
Anonymous Online Form - 1008		Online Form	10/08/21	6-5
Anonymous Online Form - 1009		Online Form	10/08/21	4-2
Anonymous Online Form - 1010		Online Form	10/08/21	4-6
Anonymous Online Form - 1011		Online Form	10/08/21	3-1
Anonymous Online Form - 1012		Online Form	10/08/21	5-10
Anonymous Online Form - 1013		Online Form	10/08/21	3-1
Anonymous Online Form - 1014		Online Form	10/08/21	4-2
Anonymous Online Form - 1015		Online Form	10/08/21	7-52
Anonymous Online Form - 1016		Online Form	10/08/21	4-2
Anonymous Online Form - 1017		Online Form	10/08/21	4-2
Anonymous Online Form - 1018		Online Form	10/08/21	5-10
Anonymous Online Form - 1019		Online Form	10/08/21	4-2
Anonymous Online Form - 1020		Online Form	10/08/21	5-10
Anonymous Online Form - 1021		Online Form	10/08/21	4-2
Anonymous Online Form - 1022		Online Form	10/09/21	7-52
Anonymous Online Form - 1023		Online Form	10/09/21	7-52
Anonymous Online Form - 1024		Online Form	10/09/21	2-6
Anonymous Online Form - 1025		Online Form	10/09/21	5-10
Anonymous Online Form - 1026		Online Form	10/09/21	6-1
Anonymous Online Form - 1027		Online Form	10/09/21	4-1
Anonymous Online Form - 1028		Online Form	10/09/21	2-1
Anonymous Online Form - 1029		Online Form	10/10/21	6-1
Anonymous Online Form - 1030		Online Form	10/10/21	6-5

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1031		Online Form	10/10/21	5-10
Anonymous Online Form - 1032		Online Form	10/10/21	4-2
Anonymous Online Form - 1033		Online Form	10/10/21	6-34
Anonymous Online Form - 1034		Online Form	10/10/21	2-1
Anonymous Online Form - 1035		Online Form	10/11/21	5-10
Anonymous Online Form - 1036		Online Form	10/11/21	4-1
Anonymous Online Form - 1037		Online Form	10/11/21	2-1
Anonymous Online Form - 1038		Online Form	10/11/21	4-84
Anonymous Online Form - 1039		Online Form	10/11/21	4-76
Anonymous Online Form - 1040		Online Form	10/11/21	4-2
Anonymous Online Form - 1041		Online Form	10/11/21	4-1
Anonymous Online Form - 1042		Online Form	10/11/21	5-10
Anonymous Online Form - 1043		Online Form	10/11/21	8-1
Anonymous Online Form - 1044		Online Form	10/11/21	3-1
Anonymous Online Form - 1045		Online Form	10/11/21	3-1
Anonymous Online Form - 1046		Online Form	10/11/21	5-10
Anonymous Online Form - 1047		Online Form	10/11/21	5-10
Anonymous Online Form - 1048		Online Form	10/11/21	2-1
Anonymous Online Form - 1049		Online Form	10/11/21	3-1
Anonymous Online Form - 1050		Online Form	10/11/21	8-9
Anonymous Online Form - 1051		Online Form	10/11/21	4-2
Anonymous Online Form - 1052		Online Form	10/11/21	4-6
Anonymous Online Form - 1053		Online Form	10/12/21	3-1
Anonymous Online Form - 1054		Online Form	10/12/21	6-1
Anonymous Online Form - 1055		Online Form	10/12/21	2-1
Anonymous Online Form - 1056		Online Form	10/12/21	3-1
Anonymous Online Form - 1057		Online Form	10/12/21	3-1
Anonymous Online Form - 1058		Online Form	10/12/21	5-10
Anonymous Online Form - 1059		Online Form	10/12/21	4-1
Anonymous Online Form - 1060		Online Form	10/12/21	2-1
Anonymous Online Form - 1061		Online Form	10/12/21	2-1
Anonymous Online Form - 1062		Online Form	10/12/21	5-10
Anonymous Online Form - 1063		Online Form	10/12/21	5-10
Anonymous Online Form - 1064		Online Form	10/12/21	8-3
Anonymous Online Form - 1065		Online Form	10/12/21	4-55
Anonymous Online Form - 1066		Online Form	10/12/21	7-52
Anonymous Online Form - 1067		Online Form	10/12/21	3-1
Anonymous Online Form - 1068		Online Form	10/12/21	3-1
Anonymous Online Form - 1069		Online Form	10/12/21	4-1
Anonymous Online Form - 1070		Online Form	10/12/21	4-1
Anonymous Online Form - 1071		Online Form	10/12/21	4-1
Anonymous Online Form - 1072		Online Form	10/12/21	4-1
Anonymous Online Form - 1073		Online Form	10/12/21	4-2
Anonymous Online Form - 1074		Online Form	10/12/21	4-1
Anonymous Online Form - 1075		Online Form	10/12/21	4-1
Anonymous Online Form - 1076		Online Form	10/12/21	4-1
Anonymous Online Form - 1077		Online Form	10/12/21	4-1
Anonymous Online Form - 1078		Online Form	10/12/21	4-1
Anonymous Online Form - 1079		Online Form	10/12/21	4-1
Anonymous Online Form - 1080		Online Form	10/12/21	4-2
Anonymous Online Form - 1081		Online Form	10/12/21	4-1
Anonymous Online Form - 1082		Online Form	10/12/21	4-1
Anonymous Online Form - 1083		Online Form	10/12/21	4-1
Anonymous Online Form - 1084		Online Form	10/12/21	4-1
Anonymous Online Form - 1085		Online Form	10/12/21	4-1
Anonymous Online Form - 1086		Online Form	10/12/21	4-1
Anonymous Online Form - 1087		Online Form	10/12/21	4-1
Anonymous Online Form - 1088		Online Form	10/12/21	4-1
Anonymous Online Form - 1089		Online Form	10/12/21	4-1
Anonymous Online Form - 1090		Online Form	10/12/21	3-1
Anonymous Online Form - 1091		Online Form	10/12/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1092		Online Form	10/12/21	4-1
Anonymous Online Form - 1093		Online Form	10/12/21	7-84
Anonymous Online Form - 1094		Online Form	10/12/21	4-1
Anonymous Online Form - 1095		Online Form	10/12/21	4-1
Anonymous Online Form - 1096		Online Form	10/12/21	4-2
Anonymous Online Form - 1097		Online Form	10/12/21	4-1
Anonymous Online Form - 1098		Online Form	10/12/21	4-1
Anonymous Online Form - 1099		Online Form	10/12/21	4-1
Anonymous Online Form - 1100		Online Form	10/12/21	2-1
Anonymous Online Form - 1101		Online Form	10/12/21	4-1
Anonymous Online Form - 1102		Online Form	10/12/21	4-1
Anonymous Online Form - 1103		Online Form	10/12/21	4-1
Anonymous Online Form - 1104		Online Form	10/12/21	4-1
Anonymous Online Form - 1105		Online Form	10/12/21	4-1
Anonymous Online Form - 1106		Online Form	10/12/21	4-1
Anonymous Online Form - 1107		Online Form	10/12/21	4-2
Anonymous Online Form - 1108		Online Form	10/12/21	4-55
Anonymous Online Form - 1109		Online Form	10/12/21	4-1
Anonymous Online Form - 1110		Online Form	10/12/21	4-1
Anonymous Online Form - 1111		Online Form	10/12/21	4-1
Anonymous Online Form - 1112		Online Form	10/12/21	4-1
Anonymous Online Form - 1113		Online Form	10/12/21	3-1
Anonymous Online Form - 1114		Online Form	10/12/21	4-1
Anonymous Online Form - 1115		Online Form	10/12/21	4-1
Anonymous Online Form - 1116		Online Form	10/12/21	4-1
Anonymous Online Form - 1117		Online Form	10/12/21	4-1
Anonymous Online Form - 1118		Online Form	10/12/21	4-1
Anonymous Online Form - 1119		Online Form	10/12/21	4-1
Anonymous Online Form - 1120		Online Form	10/12/21	4-1
Anonymous Online Form - 1121		Online Form	10/12/21	4-1
Anonymous Online Form - 1122		Online Form	10/12/21	4-2
Anonymous Online Form - 1123		Online Form	10/12/21	4-1
Anonymous Online Form - 1124		Online Form	10/12/21	4-55
Anonymous Online Form - 1125		Online Form	10/12/21	4-1
Anonymous Online Form - 1126		Online Form	10/12/21	4-1
Anonymous Online Form - 1127		Online Form	10/12/21	4-1
Anonymous Online Form - 1128		Online Form	10/12/21	4-1
Anonymous Online Form - 1129		Online Form	10/12/21	4-1
Anonymous Online Form - 1130		Online Form	10/12/21	3-1
Anonymous Online Form - 1131		Online Form	10/12/21	7-52
Anonymous Online Form - 1132		Online Form	10/12/21	4-1
Anonymous Online Form - 1133		Online Form	10/12/21	4-1
Anonymous Online Form - 1134		Online Form	10/12/21	4-1
Anonymous Online Form - 1135		Online Form	10/12/21	4-130
Anonymous Online Form - 1136		Online Form	10/12/21	7-99
Anonymous Online Form - 1137		Online Form	10/12/21	4-1
Anonymous Online Form - 1138		Online Form	10/12/21	4-1
Anonymous Online Form - 1139		Online Form	10/12/21	4-1
Anonymous Online Form - 1140		Online Form	10/12/21	4-1
Anonymous Online Form - 1141		Online Form	10/12/21	4-1
Anonymous Online Form - 1142		Online Form	10/12/21	4-1
Anonymous Online Form - 1143		Online Form	10/12/21	4-96
Anonymous Online Form - 1144		Online Form	10/12/21	4-1
Anonymous Online Form - 1145		Online Form	10/12/21	4-1
Anonymous Online Form - 1146		Online Form	10/12/21	4-1
Anonymous Online Form - 1147		Online Form	10/12/21	4-1
Anonymous Online Form - 1148		Online Form	10/12/21	6-37
Anonymous Online Form - 1149		Online Form	10/12/21	4-1
Anonymous Online Form - 1150		Online Form	10/12/21	4-1
Anonymous Online Form - 1151		Online Form	10/12/21	4-1
Anonymous Online Form - 1152		Online Form	10/12/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1153		Online Form	10/12/21	4-1
Anonymous Online Form - 1154		Online Form	10/12/21	4-1
Anonymous Online Form - 1155		Online Form	10/12/21	4-1
Anonymous Online Form - 1156		Online Form	10/12/21	5-10
Anonymous Online Form - 1157		Online Form	10/12/21	4-1
Anonymous Online Form - 1158		Online Form	10/12/21	4-1
Anonymous Online Form - 1159		Online Form	10/12/21	4-1
Anonymous Online Form - 1160		Online Form	10/12/21	4-1
Anonymous Online Form - 1161		Online Form	10/12/21	4-1
Anonymous Online Form - 1162		Online Form	10/12/21	4-1
Anonymous Online Form - 1163		Online Form	10/12/21	4-1
Anonymous Online Form - 1164		Online Form	10/12/21	4-1
Anonymous Online Form - 1165		Online Form	10/12/21	4-1
Anonymous Online Form - 1166		Online Form	10/12/21	4-1
Anonymous Online Form - 1167		Online Form	10/12/21	4-1
Anonymous Online Form - 1168		Online Form	10/12/21	4-1
Anonymous Online Form - 1169		Online Form	10/12/21	4-1
Anonymous Online Form - 1170		Online Form	10/12/21	4-1
Anonymous Online Form - 1171		Online Form	10/12/21	4-1
Anonymous Online Form - 1172		Online Form	10/12/21	4-1
Anonymous Online Form - 1173		Online Form	10/12/21	4-1
Anonymous Online Form - 1174		Online Form	10/12/21	4-61
Anonymous Online Form - 1175		Online Form	10/12/21	4-1
Anonymous Online Form - 1176		Online Form	10/12/21	4-1
Anonymous Online Form - 1177		Online Form	10/12/21	4-1
Anonymous Online Form - 1178		Online Form	10/12/21	4-1
Anonymous Online Form - 1179		Online Form	10/12/21	4-1
Anonymous Online Form - 1180		Online Form	10/12/21	4-1
Anonymous Online Form - 1181		Online Form	10/12/21	4-1
Anonymous Online Form - 1182		Online Form	10/12/21	2-1
Anonymous Online Form - 1183		Online Form	10/12/21	4-1
Anonymous Online Form - 1184		Online Form	10/12/21	4-1
Anonymous Online Form - 1185		Online Form	10/12/21	2-1
Anonymous Online Form - 1186		Online Form	10/12/21	4-1
Anonymous Online Form - 1187		Online Form	10/12/21	4-2
Anonymous Online Form - 1188		Online Form	10/12/21	4-1
Anonymous Online Form - 1189		Online Form	10/12/21	4-1
Anonymous Online Form - 1190		Online Form	10/12/21	4-1
Anonymous Online Form - 1191		Online Form	10/12/21	4-1
Anonymous Online Form - 1192		Online Form	10/12/21	4-1
Anonymous Online Form - 1193		Online Form	10/12/21	4-1
Anonymous Online Form - 1194		Online Form	10/12/21	4-1
Anonymous Online Form - 1195		Online Form	10/12/21	4-1
Anonymous Online Form - 1196		Online Form	10/12/21	4-1
Anonymous Online Form - 1197		Online Form	10/12/21	4-1
Anonymous Online Form - 1198		Online Form	10/12/21	4-1
Anonymous Online Form - 1199		Online Form	10/12/21	4-2
Anonymous Online Form - 1200		Online Form	10/12/21	4-1
Anonymous Online Form - 1201		Online Form	10/12/21	4-1
Anonymous Online Form - 1202		Online Form	10/12/21	4-1
Anonymous Online Form - 1203		Online Form	10/12/21	4-1
Anonymous Online Form - 1204		Online Form	10/12/21	4-1
Anonymous Online Form - 1205		Online Form	10/12/21	4-1
Anonymous Online Form - 1206		Online Form	10/12/21	6-5
Anonymous Online Form - 1207		Online Form	10/12/21	4-1
Anonymous Online Form - 1208		Online Form	10/12/21	6-11
Anonymous Online Form - 1209		Online Form	10/12/21	4-1
Anonymous Online Form - 1210		Online Form	10/12/21	4-1
Anonymous Online Form - 1211		Online Form	10/12/21	4-1
Anonymous Online Form - 1212		Online Form	10/12/21	4-1
Anonymous Online Form - 1213		Online Form	10/12/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1214		Online Form	10/12/21	4-1
Anonymous Online Form - 1215		Online Form	10/12/21	4-1
Anonymous Online Form - 1216		Online Form	10/12/21	4-1
Anonymous Online Form - 1217		Online Form	10/12/21	4-61
Anonymous Online Form - 1218		Online Form	10/12/21	4-1
Anonymous Online Form - 1219		Online Form	10/12/21	4-1
Anonymous Online Form - 1220		Online Form	10/12/21	4-1
Anonymous Online Form - 1221		Online Form	10/12/21	5-10
Anonymous Online Form - 1222		Online Form	10/12/21	4-1
Anonymous Online Form - 1223		Online Form	10/12/21	4-1
Anonymous Online Form - 1224		Online Form	10/12/21	3-2
Anonymous Online Form - 1225		Online Form	10/12/21	4-1
Anonymous Online Form - 1226		Online Form	10/12/21	4-1
Anonymous Online Form - 1227		Online Form	10/12/21	4-1
Anonymous Online Form - 1228		Online Form	10/12/21	4-1
Anonymous Online Form - 1229		Online Form	10/12/21	4-1
Anonymous Online Form - 1230		Online Form	10/12/21	4-1
Anonymous Online Form - 1231		Online Form	10/12/21	4-1
Anonymous Online Form - 1232		Online Form	10/12/21	4-1
Anonymous Online Form - 1233		Online Form	10/12/21	4-1
Anonymous Online Form - 1234		Online Form	10/12/21	4-2
Anonymous Online Form - 1235		Online Form	10/12/21	4-1
Anonymous Online Form - 1236		Online Form	10/12/21	4-1
Anonymous Online Form - 1237		Online Form	10/12/21	4-1
Anonymous Online Form - 1238		Online Form	10/12/21	4-1
Anonymous Online Form - 1239		Online Form	10/12/21	4-1
Anonymous Online Form - 1240		Online Form	10/12/21	4-1
Anonymous Online Form - 1241		Online Form	10/12/21	4-2
Anonymous Online Form - 1242		Online Form	10/12/21	4-1
Anonymous Online Form - 1243		Online Form	10/13/21	4-1
Anonymous Online Form - 1244		Online Form	10/13/21	4-1
Anonymous Online Form - 1245		Online Form	10/13/21	4-1
Anonymous Online Form - 1246		Online Form	10/13/21	4-1
Anonymous Online Form - 1247		Online Form	10/13/21	4-1
Anonymous Online Form - 1248		Online Form	10/13/21	4-1
Anonymous Online Form - 1249		Online Form	10/13/21	4-1
Anonymous Online Form - 1250		Online Form	10/13/21	4-1
Anonymous Online Form - 1251		Online Form	10/13/21	4-1
Anonymous Online Form - 1252		Online Form	10/13/21	4-1
Anonymous Online Form - 1253		Online Form	10/13/21	4-1
Anonymous Online Form - 1254		Online Form	10/13/21	4-1
Anonymous Online Form - 1255		Online Form	10/13/21	4-1
Anonymous Online Form - 1256		Online Form	10/13/21	4-1
Anonymous Online Form - 1257		Online Form	10/13/21	4-2
Anonymous Online Form - 1258		Online Form	10/13/21	4-1
Anonymous Online Form - 1259		Online Form	10/13/21	4-1
Anonymous Online Form - 1260		Online Form	10/13/21	4-1
Anonymous Online Form - 1261		Online Form	10/13/21	4-1
Anonymous Online Form - 1262		Online Form	10/13/21	3-1
Anonymous Online Form - 1263		Online Form	10/13/21	6-5
Anonymous Online Form - 1264		Online Form	10/13/21	4-1
Anonymous Online Form - 1265		Online Form	10/13/21	4-1
Anonymous Online Form - 1266		Online Form	10/13/21	4-1
Anonymous Online Form - 1267		Online Form	10/13/21	4-1
Anonymous Online Form - 1268		Online Form	10/13/21	4-1
Anonymous Online Form - 1269		Online Form	10/13/21	4-2
Anonymous Online Form - 1270		Online Form	10/13/21	7-86, 7-84
Anonymous Online Form - 1271		Online Form	10/13/21	4-2
Anonymous Online Form - 1272		Online Form	10/13/21	4-2
Anonymous Online Form - 1273		Online Form	10/13/21	3-1
Anonymous Online Form - 1274		Online Form	10/13/21	6-3

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1275		Online Form	10/13/21	4-2
Anonymous Online Form - 1276		Online Form	10/13/21	4-2
Anonymous Online Form - 1277		Online Form	10/13/21	3-1
Anonymous Online Form - 1278		Online Form	10/13/21	4-1
Anonymous Online Form - 1279		Online Form	10/13/21	4-1
Anonymous Online Form - 1280		Online Form	10/13/21	4-61
Anonymous Online Form - 1281		Online Form	10/13/21	4-1
Anonymous Online Form - 1282		Online Form	10/13/21	4-1
Anonymous Online Form - 1283		Online Form	10/13/21	4-1
Anonymous Online Form - 1284		Online Form	10/13/21	4-1
Anonymous Online Form - 1285		Online Form	10/13/21	4-1
Anonymous Online Form - 1286		Online Form	10/13/21	3-2
Anonymous Online Form - 1287		Online Form	10/13/21	4-1
Anonymous Online Form - 1288		Online Form	10/13/21	3-1
Anonymous Online Form - 1289		Online Form	10/13/21	2-1
Anonymous Online Form - 1290		Online Form	10/13/21	5-17
Anonymous Online Form - 1291		Online Form	10/13/21	4-1
Anonymous Online Form - 1292		Online Form	10/13/21	4-1
Anonymous Online Form - 1293		Online Form	10/13/21	4-1
Anonymous Online Form - 1294		Online Form	10/13/21	4-1
Anonymous Online Form - 1295		Online Form	10/13/21	4-55
Anonymous Online Form - 1296		Online Form	10/13/21	4-1
Anonymous Online Form - 1297		Online Form	10/13/21	4-1
Anonymous Online Form - 1298		Online Form	10/13/21	4-1
Anonymous Online Form - 1299		Online Form	10/13/21	4-2
Anonymous Online Form - 1300		Online Form	10/13/21	7-8
Anonymous Online Form - 1301		Online Form	10/13/21	3-1
Anonymous Online Form - 1302		Online Form	10/13/21	4-107
Anonymous Online Form - 1303		Online Form	10/13/21	5-13
Anonymous Online Form - 1304		Online Form	10/13/21	6-11
Anonymous Online Form - 1305		Online Form	10/13/21	4-1
Anonymous Online Form - 1306		Online Form	10/13/21	4-47
Anonymous Online Form - 1307		Online Form	10/13/21	4-1
Anonymous Online Form - 1308		Online Form	10/13/21	4-1
Anonymous Online Form - 1309		Online Form	10/13/21	4-1
Anonymous Online Form - 1310		Online Form	10/13/21	4-1
Anonymous Online Form - 1311		Online Form	10/13/21	4-1
Anonymous Online Form - 1312		Online Form	10/13/21	4-2
Anonymous Online Form - 1313		Online Form	10/13/21	4-1
Anonymous Online Form - 1314		Online Form	10/13/21	4-2
Anonymous Online Form - 1315		Online Form	10/13/21	4-61
Anonymous Online Form - 1316		Online Form	10/13/21	4-2
Anonymous Online Form - 1317		Online Form	10/13/21	4-2
Anonymous Online Form - 1318		Online Form	10/13/21	3-1
Anonymous Online Form - 1319		Online Form	10/13/21	4-1
Anonymous Online Form - 1320		Online Form	10/13/21	6-3
Anonymous Online Form - 1321		Online Form	10/13/21	4-70
Anonymous Online Form - 1322		Online Form	10/13/21	4-2
Anonymous Online Form - 1323		Online Form	10/13/21	4-2
Anonymous Online Form - 1324		Online Form	10/13/21	4-1
Anonymous Online Form - 1325		Online Form	10/13/21	4-55
Anonymous Online Form - 1326		Online Form	10/13/21	7-84
Anonymous Online Form - 1327		Online Form	10/13/21	7-26
Anonymous Online Form - 1328		Online Form	10/13/21	4-103
Anonymous Online Form - 1329		Online Form	10/13/21	4-2
Anonymous Online Form - 1330		Online Form	10/13/21	4-1
Anonymous Online Form - 1331		Online Form	10/13/21	4-2
Anonymous Online Form - 1332		Online Form	10/13/21	4-47
Anonymous Online Form - 1333		Online Form	10/13/21	4-1
Anonymous Online Form - 1334		Online Form	10/13/21	4-1
Anonymous Online Form - 1335		Online Form	10/13/21	7-8

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1336		Online Form	10/13/21	4-1
Anonymous Online Form - 1337		Online Form	10/13/21	5-10
Anonymous Online Form - 1338		Online Form	10/13/21	4-47
Anonymous Online Form - 1339		Online Form	10/13/21	4-1
Anonymous Online Form - 1340		Online Form	10/13/21	4-1
Anonymous Online Form - 1341		Online Form	10/13/21	4-1
Anonymous Online Form - 1342		Online Form	10/13/21	6-1
Anonymous Online Form - 1343		Online Form	10/13/21	4-2
Anonymous Online Form - 1344		Online Form	10/13/21	3-1
Anonymous Online Form - 1345		Online Form	10/13/21	4-2
Anonymous Online Form - 1346		Online Form	10/13/21	4-2
Anonymous Online Form - 1347		Online Form	10/13/21	7-107
Anonymous Online Form - 1348		Online Form	10/13/21	4-1
Anonymous Online Form - 1349		Online Form	10/13/21	4-1
Anonymous Online Form - 1350		Online Form	10/13/21	4-102
Anonymous Online Form - 1351		Online Form	10/13/21	5-18
Anonymous Online Form - 1352		Online Form	10/13/21	6-11
Anonymous Online Form - 1353		Online Form	10/13/21	4-1
Anonymous Online Form - 1354		Online Form	10/13/21	3-1
Anonymous Online Form - 1355		Online Form	10/13/21	4-1
Anonymous Online Form - 1356		Online Form	10/13/21	2-1
Anonymous Online Form - 1357		Online Form	10/13/21	4-2
Anonymous Online Form - 1358		Online Form	10/13/21	4-1
Anonymous Online Form - 1359		Online Form	10/13/21	4-2
Anonymous Online Form - 1360		Online Form	10/13/21	7-84
Anonymous Online Form - 1361		Online Form	10/13/21	2-1
Anonymous Online Form - 1362		Online Form	10/13/21	4-2
Anonymous Online Form - 1363		Online Form	10/13/21	3-1
Anonymous Online Form - 1364		Online Form	10/13/21	4-1
Anonymous Online Form - 1365		Online Form	10/13/21	2-1
Anonymous Online Form - 1366		Online Form	10/13/21	4-2
Anonymous Online Form - 1367		Online Form	10/13/21	4-1
Anonymous Online Form - 1368		Online Form	10/13/21	4-2
Anonymous Online Form - 1369		Online Form	10/13/21	4-1
Anonymous Online Form - 1370		Online Form	10/13/21	4-2
Anonymous Online Form - 1371		Online Form	10/13/21	4-1
Anonymous Online Form - 1372		Online Form	10/13/21	4-1
Anonymous Online Form - 1373		Online Form	10/13/21	4-2
Anonymous Online Form - 1374		Online Form	10/13/21	4-1
Anonymous Online Form - 1375		Online Form	10/13/21	4-2
Anonymous Online Form - 1376		Online Form	10/13/21	3-1
Anonymous Online Form - 1377		Online Form	10/13/21	2-1
Anonymous Online Form - 1378		Online Form	10/13/21	6-1
Anonymous Online Form - 1379		Online Form	10/13/21	4-1
Anonymous Online Form - 1380		Online Form	10/13/21	4-1
Anonymous Online Form - 1381		Online Form	10/13/21	3-1
Anonymous Online Form - 1382		Online Form	10/13/21	6-34
Anonymous Online Form - 1383		Online Form	10/13/21	3-1
Anonymous Online Form - 1384		Online Form	10/13/21	6-1
Anonymous Online Form - 1385		Online Form	10/13/21	4-2
Anonymous Online Form - 1386		Online Form	10/13/21	6-5
Anonymous Online Form - 1387		Online Form	10/13/21	4-2
Anonymous Online Form - 1388		Online Form	10/13/21	4-1
Anonymous Online Form - 1389		Online Form	10/13/21	5-10
Anonymous Online Form - 1390		Online Form	10/13/21	5-10
Anonymous Online Form - 1391		Online Form	10/13/21	4-1
Anonymous Online Form - 1392		Online Form	10/13/21	4-2
Anonymous Online Form - 1393		Online Form	10/13/21	4-1
Anonymous Online Form - 1394		Online Form	10/13/21	4-1
Anonymous Online Form - 1395		Online Form	10/13/21	4-1
Anonymous Online Form - 1396		Online Form	10/13/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1397		Online Form	10/13/21	4-1
Anonymous Online Form - 1398		Online Form	10/13/21	4-1
Anonymous Online Form - 1399		Online Form	10/13/21	4-1
Anonymous Online Form - 1400		Online Form	10/13/21	4-1
Anonymous Online Form - 1401		Online Form	10/13/21	4-1
Anonymous Online Form - 1402		Online Form	10/13/21	7-133
Anonymous Online Form - 1403		Online Form	10/13/21	4-1
Anonymous Online Form - 1404		Online Form	10/13/21	4-1
Anonymous Online Form - 1405		Online Form	10/13/21	4-1
Anonymous Online Form - 1406		Online Form	10/13/21	4-1
Anonymous Online Form - 1407		Online Form	10/13/21	4-1
Anonymous Online Form - 1408		Online Form	10/13/21	4-1
Anonymous Online Form - 1409		Online Form	10/13/21	4-1
Anonymous Online Form - 1410		Online Form	10/13/21	4-1
Anonymous Online Form - 1411		Online Form	10/13/21	7-129
Anonymous Online Form - 1412		Online Form	10/13/21	4-6
Anonymous Online Form - 1413		Online Form	10/13/21	4-1
Anonymous Online Form - 1414		Online Form	10/13/21	4-2
Anonymous Online Form - 1415		Online Form	10/13/21	3-1
Anonymous Online Form - 1416		Online Form	10/13/21	4-2
Anonymous Online Form - 1417		Online Form	10/13/21	7-52
Anonymous Online Form - 1418		Online Form	10/13/21	4-104
Anonymous Online Form - 1419		Online Form	10/13/21	4-2
Anonymous Online Form - 1420		Online Form	10/13/21	4-1
Anonymous Online Form - 1421		Online Form	10/13/21	4-1
Anonymous Online Form - 1422		Online Form	10/13/21	5-10
Anonymous Online Form - 1423		Online Form	10/13/21	6-1
Anonymous Online Form - 1424		Online Form	10/13/21	3-1
Anonymous Online Form - 1425		Online Form	10/13/21	4-1
Anonymous Online Form - 1426		Online Form	10/13/21	4-2
Anonymous Online Form - 1427		Online Form	10/13/21	3-1
Anonymous Online Form - 1428		Online Form	10/13/21	4-47
Anonymous Online Form - 1429		Online Form	10/13/21	7-32
Anonymous Online Form - 1430		Online Form	10/13/21	6-1
Anonymous Online Form - 1431		Online Form	10/13/21	4-2
Anonymous Online Form - 1432		Online Form	10/13/21	4-2
Anonymous Online Form - 1433		Online Form	10/13/21	4-1
Anonymous Online Form - 1434		Online Form	10/13/21	4-2
Anonymous Online Form - 1435		Online Form	10/13/21	4-1
Anonymous Online Form - 1436		Online Form	10/13/21	4-1
Anonymous Online Form - 1437		Online Form	10/13/21	4-2
Anonymous Online Form - 1438		Online Form	10/13/21	4-1
Anonymous Online Form - 1439		Online Form	10/13/21	4-1
Anonymous Online Form - 1440		Online Form	10/13/21	4-2
Anonymous Online Form - 1441		Online Form	10/13/21	4-2
Anonymous Online Form - 1442		Online Form	10/13/21	3-1
Anonymous Online Form - 1443		Online Form	10/13/21	2-1
Anonymous Online Form - 1444		Online Form	10/13/21	4-2
Anonymous Online Form - 1445		Online Form	10/13/21	4-1
Anonymous Online Form - 1446		Online Form	10/13/21	3-2
Anonymous Online Form - 1447		Online Form	10/13/21	4-2
Anonymous Online Form - 1448		Online Form	10/13/21	4-1
Anonymous Online Form - 1449		Online Form	10/13/21	6-1
Anonymous Online Form - 1450		Online Form	10/13/21	4-2
Anonymous Online Form - 1451		Online Form	10/13/21	3-1
Anonymous Online Form - 1452		Online Form	10/13/21	4-1
Anonymous Online Form - 1453		Online Form	10/13/21	6-1
Anonymous Online Form - 1454		Online Form	10/14/21	4-1
Anonymous Online Form - 1455		Online Form	10/14/21	4-1
Anonymous Online Form - 1456		Online Form	10/14/21	4-2
Anonymous Online Form - 1457		Online Form	10/14/21	7-129

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1458		Online Form	10/14/21	4-1
Anonymous Online Form - 1459		Online Form	10/14/21	4-1
Anonymous Online Form - 1460		Online Form	10/14/21	4-1
Anonymous Online Form - 1461		Online Form	10/14/21	2-1
Anonymous Online Form - 1462		Online Form	10/14/21	4-1
Anonymous Online Form - 1463		Online Form	10/14/21	4-1
Anonymous Online Form - 1464		Online Form	10/14/21	3-1
Anonymous Online Form - 1465		Online Form	10/14/21	2-1
Anonymous Online Form - 1466		Online Form	10/14/21	4-2
Anonymous Online Form - 1467		Online Form	10/14/21	4-1
Anonymous Online Form - 1468		Online Form	10/14/21	5-19
Anonymous Online Form - 1469		Online Form	10/14/21	4-2
Anonymous Online Form - 1470		Online Form	10/14/21	4-55
Anonymous Online Form - 1471		Online Form	10/14/21	6-34
Anonymous Online Form - 1472		Online Form	10/14/21	4-47
Anonymous Online Form - 1473		Online Form	10/14/21	4-1
Anonymous Online Form - 1474		Online Form	10/14/21	4-1
Anonymous Online Form - 1475		Online Form	10/14/21	4-1
Anonymous Online Form - 1476		Online Form	10/14/21	3-1
Anonymous Online Form - 1477		Online Form	10/14/21	4-1
Anonymous Online Form - 1478		Online Form	10/14/21	4-1
Anonymous Online Form - 1479		Online Form	10/14/21	4-1
Anonymous Online Form - 1480		Online Form	10/14/21	3-1
Anonymous Online Form - 1481		Online Form	10/14/21	4-1
Anonymous Online Form - 1482		Online Form	10/14/21	4-1
Anonymous Online Form - 1483		Online Form	10/14/21	3-1
Anonymous Online Form - 1484		Online Form	10/14/21	4-1
Anonymous Online Form - 1485		Online Form	10/14/21	3-1
Anonymous Online Form - 1486		Online Form	10/14/21	4-1
Anonymous Online Form - 1487		Online Form	10/14/21	3-1
Anonymous Online Form - 1488		Online Form	10/14/21	7-27
Anonymous Online Form - 1489		Online Form	10/14/21	5-10
Anonymous Online Form - 1490		Online Form	10/14/21	4-1
Anonymous Online Form - 1491		Online Form	10/14/21	4-1
Anonymous Online Form - 1492		Online Form	10/14/21	4-1
Anonymous Online Form - 1493		Online Form	10/14/21	4-1
Anonymous Online Form - 1494		Online Form	10/14/21	4-1
Anonymous Online Form - 1495		Online Form	10/14/21	4-1
Anonymous Online Form - 1496		Online Form	10/14/21	4-1
Anonymous Online Form - 1497		Online Form	10/14/21	4-1
Anonymous Online Form - 1498		Online Form	10/14/21	3-1
Anonymous Online Form - 1499		Online Form	10/14/21	3-1
Anonymous Online Form - 1500		Online Form	10/14/21	4-1
Anonymous Online Form - 1501		Online Form	10/14/21	4-1
Anonymous Online Form - 1502		Online Form	10/14/21	2-1
Anonymous Online Form - 1503		Online Form	10/14/21	3-1
Anonymous Online Form - 1504		Online Form	10/14/21	4-1
Anonymous Online Form - 1505		Online Form	10/14/21	4-61
Anonymous Online Form - 1506		Online Form	10/14/21	4-1
Anonymous Online Form - 1507		Online Form	10/14/21	4-1
Anonymous Online Form - 1508		Online Form	10/14/21	4-1
Anonymous Online Form - 1509		Online Form	10/14/21	4-1
Anonymous Online Form - 1510		Online Form	10/14/21	4-1
Anonymous Online Form - 1511		Online Form	10/14/21	4-1
Anonymous Online Form - 1512		Online Form	10/14/21	4-1
Anonymous Online Form - 1513		Online Form	10/14/21	2-1
Anonymous Online Form - 1514		Online Form	10/14/21	8-1
Anonymous Online Form - 1515		Online Form	10/14/21	4-1
Anonymous Online Form - 1516		Online Form	10/14/21	4-1
Anonymous Online Form - 1517		Online Form	10/14/21	4-2
Anonymous Online Form - 1518		Online Form	10/14/21	3-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1519		Online Form	10/14/21	7-84
Anonymous Online Form - 1520		Online Form	10/14/21	4-1
Anonymous Online Form - 1521		Online Form	10/14/21	4-2
Anonymous Online Form - 1522		Online Form	10/14/21	4-128
Anonymous Online Form - 1523		Online Form	10/14/21	8-1
Anonymous Online Form - 1524		Online Form	10/14/21	3-1
Anonymous Online Form - 1525		Online Form	10/14/21	4-1
Anonymous Online Form - 1526		Online Form	10/14/21	8-4
Anonymous Online Form - 1527		Online Form	10/14/21	4-1
Anonymous Online Form - 1528		Online Form	10/14/21	4-1
Anonymous Online Form - 1529		Online Form	10/14/21	4-1
Anonymous Online Form - 1530		Online Form	10/14/21	4-1
Anonymous Online Form - 1531		Online Form	10/14/21	4-1
Anonymous Online Form - 1532		Online Form	10/14/21	4-1
Anonymous Online Form - 1533		Online Form	10/14/21	4-1
Anonymous Online Form - 1534		Online Form	10/14/21	4-1
Anonymous Online Form - 1535		Online Form	10/14/21	3-1
Anonymous Online Form - 1536		Online Form	10/14/21	4-1
Anonymous Online Form - 1537		Online Form	07/20/21	4-2
Anonymous Online Form - 1538		Online Form	10/14/21	4-1
Anonymous Online Form - 1539		Online Form	07/20/21	4-2
Anonymous Online Form - 1540		Online Form	10/14/21	4-1
Anonymous Online Form - 1541		Online Form	10/14/21	4-1
Anonymous Online Form - 1542		Online Form	10/14/21	4-1
Anonymous Online Form - 1543		Online Form	10/14/21	4-4
Anonymous Online Form - 1544		Online Form	10/14/21	4-1
Anonymous Online Form - 1545		Online Form	10/14/21	4-1
Anonymous Online Form - 1546		Online Form	10/14/21	4-1
Anonymous Online Form - 1547		Online Form	10/14/21	4-1
Anonymous Online Form - 1548		Online Form	10/14/21	6-1
Anonymous Online Form - 1549		Online Form	10/14/21	7-129
Anonymous Online Form - 1550		Online Form	10/14/21	4-1
Anonymous Online Form - 1551		Online Form	10/14/21	4-1
Anonymous Online Form - 1552		Online Form	10/14/21	4-3
Anonymous Online Form - 1553		Online Form	10/14/21	4-1
Anonymous Online Form - 1554		Online Form	10/14/21	5-17
Anonymous Online Form - 1555		Online Form	10/14/21	4-1
Anonymous Online Form - 1556		Online Form	10/14/21	4-47
Anonymous Online Form - 1557		Online Form	10/14/21	3-1
Anonymous Online Form - 1558		Online Form	10/14/21	7-129
Anonymous Online Form - 1559		Online Form	10/14/21	4-1
Anonymous Online Form - 1560		Online Form	10/14/21	7-52
Anonymous Online Form - 1561		Online Form	10/14/21	2-1
Anonymous Online Form - 1562		Online Form	10/14/21	3-1
Anonymous Online Form - 1563		Online Form	10/14/21	6-5
Anonymous Online Form - 1564		Online Form	10/14/21	4-1
Anonymous Online Form - 1565		Online Form	10/14/21	4-1
Anonymous Online Form - 1566		Online Form	10/14/21	4-1
Anonymous Online Form - 1567		Online Form	10/14/21	4-1
Anonymous Online Form - 1568		Online Form	10/14/21	4-2
Anonymous Online Form - 1569		Online Form	10/14/21	4-1
Anonymous Online Form - 1570		Online Form	10/14/21	4-1
Anonymous Online Form - 1571		Online Form	10/14/21	4-1
Anonymous Online Form - 1572		Online Form	10/14/21	4-17
Anonymous Online Form - 1573		Online Form	10/14/21	4-1
Anonymous Online Form - 1574		Online Form	10/14/21	4-83
Anonymous Online Form - 1575		Online Form	10/14/21	7-84
Anonymous Online Form - 1576		Online Form	10/14/21	4-1
Anonymous Online Form - 1577		Online Form	10/14/21	4-1
Anonymous Online Form - 1578		Online Form	10/14/21	2-1
Anonymous Online Form - 1579		Online Form	10/14/21	3-2

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1580		Online Form	10/14/21	4-1
Anonymous Online Form - 1581		Online Form	10/14/21	4-1
Anonymous Online Form - 1582		Online Form	10/14/21	4-1
Anonymous Online Form - 1583		Online Form	10/14/21	4-2
Anonymous Online Form - 1584		Online Form	10/14/21	4-2
Anonymous Online Form - 1585		Online Form	10/14/21	3-1
Anonymous Online Form - 1586		Online Form	10/14/21	4-1
Anonymous Online Form - 1587		Online Form	10/14/21	6-5
Anonymous Online Form - 1588		Online Form	10/14/21	4-2
Anonymous Online Form - 1589		Online Form	10/14/21	4-2
Anonymous Online Form - 1590		Online Form	10/14/21	4-97
Anonymous Online Form - 1591		Online Form	10/14/21	3-1
Anonymous Online Form - 1592		Online Form	10/14/21	8-1
Anonymous Online Form - 1593		Online Form	10/14/21	4-2
Anonymous Online Form - 1594		Online Form	10/14/21	4-2
Anonymous Online Form - 1595		Online Form	10/14/21	4-1
Anonymous Online Form - 1596		Online Form	10/14/21	4-22
Anonymous Online Form - 1597		Online Form	10/14/21	4-1
Anonymous Online Form - 1598		Online Form	10/14/21	4-2
Anonymous Online Form - 1599		Online Form	10/14/21	4-1
Anonymous Online Form - 1600		Online Form	10/14/21	6-9
Anonymous Online Form - 1601		Online Form	10/14/21	4-1
Anonymous Online Form - 1602		Online Form	10/14/21	7-32
Anonymous Online Form - 1603		Online Form	10/14/21	3-2
Anonymous Online Form - 1604		Online Form	10/14/21	4-1
Anonymous Online Form - 1605		Online Form	10/14/21	4-2
Anonymous Online Form - 1606		Online Form	10/14/21	4-1
Anonymous Online Form - 1607		Online Form	10/14/21	4-1
Anonymous Online Form - 1608		Online Form	10/14/21	4-1
Anonymous Online Form - 1609		Online Form	10/14/21	4-2
Anonymous Online Form - 1610		Online Form	10/14/21	4-1
Anonymous Online Form - 1611		Online Form	10/14/21	7-130
Anonymous Online Form - 1612		Online Form	10/14/21	4-1
Anonymous Online Form - 1613		Online Form	10/14/21	8-3
Anonymous Online Form - 1614		Online Form	10/14/21	4-1
Anonymous Online Form - 1615		Online Form	10/14/21	4-1
Anonymous Online Form - 1616		Online Form	10/14/21	3-1
Anonymous Online Form - 1617		Online Form	10/14/21	4-2
Anonymous Online Form - 1618		Online Form	10/14/21	4-1
Anonymous Online Form - 1619		Online Form	10/14/21	4-1
Anonymous Online Form - 1620		Online Form	10/14/21	4-1
Anonymous Online Form - 1621		Online Form	10/14/21	4-1
Anonymous Online Form - 1622		Online Form	10/14/21	8-2
Anonymous Online Form - 1623		Online Form	10/14/21	4-1
Anonymous Online Form - 1624		Online Form	10/14/21	7-133
Anonymous Online Form - 1625		Online Form	10/14/21	7-32
Anonymous Online Form - 1626		Online Form	10/14/21	4-1
Anonymous Online Form - 1627		Online Form	10/14/21	4-1
Anonymous Online Form - 1628		Online Form	10/14/21	4-1
Anonymous Online Form - 1629		Online Form	10/14/21	4-1
Anonymous Online Form - 1630		Online Form	10/14/21	4-2
Anonymous Online Form - 1631		Online Form	10/14/21	2-1
Anonymous Online Form - 1632		Online Form	10/14/21	4-1
Anonymous Online Form - 1633		Online Form	10/14/21	4-1
Anonymous Online Form - 1634		Online Form	10/14/21	4-2
Anonymous Online Form - 1635		Online Form	10/14/21	2-1
Anonymous Online Form - 1636		Online Form	10/14/21	4-1
Anonymous Online Form - 1637		Online Form	10/14/21	4-2
Anonymous Online Form - 1638		Online Form	10/14/21	4-1
Anonymous Online Form - 1639		Online Form	10/14/21	4-2
Anonymous Online Form - 1640		Online Form	10/14/21	3-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment		Response Number(s)
		Type	Date	
Anonymous Online Form - 1641		Online Form	10/14/21	4-1
Anonymous Online Form - 1642		Online Form	10/14/21	5-10
Anonymous Online Form - 1643		Online Form	10/14/21	4-1
Anonymous Online Form - 1644		Online Form	10/14/21	3-1
Anonymous Online Form - 1645		Online Form	10/14/21	2-1
Anonymous Online Form - 1646		Online Form	10/14/21	4-1
Anonymous Online Form - 1647		Online Form	10/14/21	4-1
Anonymous Online Form - 1648		Online Form	10/14/21	4-1
Anonymous Online Form - 1649		Online Form	10/14/21	4-106
Anonymous Online Form - 1650		Online Form	10/14/21	4-2
Anonymous Online Form - 1651		Online Form	10/14/21	2-1
Anonymous Online Form - 1652		Online Form	10/14/21	4-2
Anonymous Online Form - 1653		Online Form	10/14/21	4-1
Anonymous Online Form - 1654		Online Form	10/14/21	4-1
Anonymous Online Form - 1655		Online Form	10/14/21	4-17
Anonymous Online Form - 1656		Online Form	10/14/21	7-70
Anonymous Online Form - 1657		Online Form	10/14/21	4-2
Anonymous Online Form - 1658		Online Form	10/14/21	4-47
Anonymous Online Form - 1659		Online Form	10/14/21	4-1
Anonymous Online Form - 1660		Online Form	10/14/21	4-4
Anonymous Online Form - 1661		Online Form	10/14/21	4-2
Anonymous Online Form - 1662		Online Form	10/14/21	4-2
Anonymous Online Form - 1663		Online Form	10/14/21	7-32
Anonymous Online Form - 1664		Online Form	10/14/21	2-1
Anonymous Online Form - 1665		Online Form	10/14/21	4-2
Anonymous Online Form - 1666		Online Form	10/14/21	3-1
Anonymous Online Form - 1667		Online Form	10/14/21	4-70
Anonymous Online Form - 1668		Online Form	10/14/21	4-4
Anonymous Online Form - 1669		Online Form	10/14/21	4-2
Anonymous Online Form - 1670		Online Form	10/14/21	4-2
Anonymous Online Form - 1671		Online Form	10/14/21	7-9
Anonymous Online Form - 1672		Online Form	10/14/21	4-2
Anonymous Online Form - 1673		Online Form	10/14/21	5-10
Anonymous Online Form - 1674		Online Form	10/14/21	4-2
Anonymous Online Form - 1675		Online Form	10/14/21	4-1
Anonymous Online Form - 1676		Online Form	10/14/21	3-1
Anonymous Online Form - 1677		Online Form	10/14/21	4-2
Anonymous Online Form - 1678		Online Form	10/14/21	4-104
Anonymous Online Form - 1679		Online Form	10/14/21	3-1
Anonymous Online Form - 1680		Online Form	10/14/21	4-115
Anonymous Online Form - 1681		Online Form	10/14/21	4-1
Anonymous Online Form - 1682		Online Form	10/14/21	3-1
Anonymous Online Form - 1683		Online Form	10/14/21	3-1
Anonymous Online Form - 1684		Online Form	10/14/21	4-2
Anonymous Online Form - 1685		Online Form	10/14/21	4-1
Anonymous Online Form - 1686		Online Form	10/14/21	3-1
Anonymous Online Form - 1687		Online Form	10/14/21	5-10
Anonymous Online Form - 1688		Online Form	10/14/21	4-42
Anonymous Online Form - 1689		Online Form	10/14/21	3-1
Anonymous Online Form - 1690		Online Form	10/14/21	4-2
Anonymous Online Form - 1691		Online Form	10/14/21	4-2
Anonymous Online Form - 1692		Online Form	10/14/21	4-2
Anonymous Online Form - 1693		Online Form	10/14/21	3-1
Anonymous Online Form - 1694		Online Form	10/14/21	4-1
Anonymous Online Form - 1695		Online Form	10/14/21	6-5
Anonymous Online Form - 1696		Online Form	10/14/21	4-2
Anonymous Online Form - 1697		Online Form	10/14/21	4-1
Anonymous Online Form - 1698		Online Form	10/14/21	6-11
Anonymous Online Form - 1699		Online Form	10/14/21	4-1
Anonymous Online Form - 1700		Online Form	10/14/21	7-52
Anonymous Online Form - 1701		Online Form	10/14/21	6-5

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1702		Online Form	10/14/21	3-1
Anonymous Online Form - 1703		Online Form	10/14/21	4-2
Anonymous Online Form - 1704		Online Form	10/14/21	6-11
Anonymous Online Form - 1705		Online Form	10/14/21	4-2
Anonymous Online Form - 1706		Online Form	10/14/21	4-2
Anonymous Online Form - 1707		Online Form	10/14/21	4-2
Anonymous Online Form - 1708		Online Form	10/14/21	4-1
Anonymous Online Form - 1709		Online Form	10/14/21	3-1
Anonymous Online Form - 1710		Online Form	10/14/21	4-1
Anonymous Online Form - 1711		Online Form	10/14/21	4-1
Anonymous Online Form - 1712		Online Form	10/14/21	4-47
Anonymous Online Form - 1713		Online Form	10/14/21	4-70
Anonymous Online Form - 1714		Online Form	10/14/21	4-2
Anonymous Online Form - 1715		Online Form	10/14/21	4-1
Anonymous Online Form - 1716		Online Form	10/14/21	4-61
Anonymous Online Form - 1717		Online Form	10/14/21	4-1
Anonymous Online Form - 1718		Online Form	10/14/21	4-1
Anonymous Online Form - 1719		Online Form	10/14/21	7-52
Anonymous Online Form - 1720		Online Form	10/14/21	4-1
Anonymous Online Form - 1721		Online Form	10/14/21	4-1
Anonymous Online Form - 1722		Online Form	09/14/21	4-15
Anonymous Online Form - 1723		Online Form	09/14/21	4-15
Anonymous Online Form - 1724		Online Form	09/14/21	4-55
Anonymous Online Form - 1725		Online Form	09/14/21	4-55
Anonymous Online Form - 1726		Online Form	09/14/21	7-1
Anonymous Online Form - 1727		Online Form	09/14/21	7-1
Anonymous Online Form - 1728		Online Form	09/14/21	6-7
Anonymous Online Form - 1729		Online Form	09/14/21	6-7
Anonymous Online Form - 1730		Online Form	07/18/21	6-3
Anonymous Online Form - 1731		Online Form	07/18/21	3-1
Anonymous Online Form - 1732		Online Form	09/22/21	7-58
Anonymous Online Form - 1733		Online Form	09/22/21	7-58
Anonymous Online Form - 1734		Online Form	09/22/21	4-2
Anonymous Online Form - 1735		Online Form	09/22/21	4-2
Anonymous Online Form - 1736		Online Form	09/23/21	4-1
Anonymous Online Form - 1737		Online Form	09/23/21	4-1
Anonymous Online Form - 1738		Online Form	09/23/21	7-13
Anonymous Online Form - 1739		Online Form	09/23/21	7-13
Anonymous Online Form - 1740		Online Form	09/30/21	7-10
Anonymous Online Form - 1741		Online Form	09/30/21	7-10
Anonymous Online Form - 1742		Online Form	09/30/21	4-47
Anonymous Online Form - 1743		Online Form	09/30/21	4-47
Anonymous Online Form - 1744		Online Form	09/30/21	7-133
Anonymous Online Form - 1745		Online Form	09/30/21	7-133
Anonymous Online Form - 1746		Online Form	10/05/21	7-52
Anonymous Online Form - 1747		Online Form	10/05/21	4-3
Anonymous Online Form - 1748		Online Form	07/16/21	6-11
Anonymous Online Form - 1749		Online Form	07/16/21	6-25
Anonymous Online Form - 1750		Online Form	10/11/21	4-1
Anonymous Online Form - 1751		Online Form	10/11/21	4-61
Anonymous Online Form - 1752		Online Form	10/12/21	4-1
Anonymous Online Form - 1753		Online Form	10/12/21	4-61
Anonymous Online Form - 1754		Online Form	10/12/21	4-1
Anonymous Online Form - 1755		Online Form	10/12/21	4-61
Anonymous Online Form - 1756		Online Form	10/12/21	4-1
Anonymous Online Form - 1757		Online Form	10/12/21	4-61
Anonymous Online Form - 1758		Online Form	10/12/21	4-1
Anonymous Online Form - 1759		Online Form	10/12/21	4-61
Anonymous Online Form - 1760		Online Form	10/12/21	4-1
Anonymous Online Form - 1761		Online Form	10/12/21	4-61
Anonymous Online Form - 1762		Online Form	10/12/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1763		Online Form	10/12/21	4-61
Anonymous Online Form - 1764		Online Form	10/12/21	4-1
Anonymous Online Form - 1765		Online Form	10/12/21	4-61
Anonymous Online Form - 1766		Online Form	10/12/21	4-1
Anonymous Online Form - 1767		Online Form	10/12/21	4-61
Anonymous Online Form - 1768		Online Form	07/16/21	6-3
Anonymous Online Form - 1769		Online Form	07/16/21	6-11
Anonymous Online Form - 1770		Online Form	10/12/21	4-1
Anonymous Online Form - 1771		Online Form	10/12/21	4-61
Anonymous Online Form - 1772		Online Form	10/12/21	4-1
Anonymous Online Form - 1773		Online Form	10/12/21	4-61
Anonymous Online Form - 1774		Online Form	10/12/21	4-1
Anonymous Online Form - 1775		Online Form	10/12/21	4-61
Anonymous Online Form - 1776		Online Form	10/12/21	4-1
Anonymous Online Form - 1777		Online Form	10/12/21	4-61
Anonymous Online Form - 1778		Online Form	10/12/21	4-1
Anonymous Online Form - 1779		Online Form	10/12/21	4-61
Anonymous Online Form - 1780		Online Form	10/12/21	4-1
Anonymous Online Form - 1781		Online Form	10/12/21	4-61
Anonymous Online Form - 1782		Online Form	10/12/21	4-1
Anonymous Online Form - 1783		Online Form	10/12/21	4-61
Anonymous Online Form - 1784		Online Form	10/13/21	4-1
Anonymous Online Form - 1785		Online Form	10/13/21	4-61
Anonymous Online Form - 1786		Online Form	10/13/21	4-1
Anonymous Online Form - 1787		Online Form	10/13/21	4-55
Anonymous Online Form - 1788		Online Form	10/13/21	4-1
Anonymous Online Form - 1789		Online Form	10/13/21	4-55
Anonymous Online Form - 1790		Online Form	10/13/21	4-1
Anonymous Online Form - 1791		Online Form	10/13/21	4-55
Anonymous Online Form - 1792		Online Form	10/13/21	6-1
Anonymous Online Form - 1793		Online Form	10/13/21	4-102
Anonymous Online Form - 1794		Online Form	10/13/21	4-61
Anonymous Online Form - 1795		Online Form	10/13/21	4-1, 6-3
Anonymous Online Form - 1796		Online Form	10/13/21	4-1
Anonymous Online Form - 1797		Online Form	10/13/21	4-61
Anonymous Online Form - 1798		Online Form	10/13/21	4-55
Anonymous Online Form - 1799		Online Form	10/13/21	3-1
Anonymous Online Form - 1800		Online Form	10/13/21	4-1
Anonymous Online Form - 1801		Online Form	10/13/21	4-61
Anonymous Online Form - 1802		Online Form	10/13/21	4-1
Anonymous Online Form - 1803		Online Form	10/13/21	7-16
Anonymous Online Form - 1804		Online Form	10/13/21	4-1
Anonymous Online Form - 1805		Online Form	10/13/21	4-61
Anonymous Online Form - 1806		Online Form	10/13/21	4-148
Anonymous Online Form - 1807		Online Form	10/13/21	6-2
Anonymous Online Form - 1808		Online Form	10/13/21	4-1
Anonymous Online Form - 1809		Online Form	10/13/21	4-61
Anonymous Online Form - 1810		Online Form	10/13/21	4-1
Anonymous Online Form - 1811		Online Form	10/13/21	4-61
Anonymous Online Form - 1812		Online Form	10/13/21	4-47
Anonymous Online Form - 1813		Online Form	10/13/21	4-1
Anonymous Online Form - 1814		Online Form	10/13/21	4-61
Anonymous Online Form - 1815		Online Form	10/14/21	7-87
Anonymous Online Form - 1816		Online Form	10/14/21	7-99
Anonymous Online Form - 1817		Online Form	10/14/21	4-1
Anonymous Online Form - 1818		Online Form	10/14/21	4-61
Anonymous Online Form - 1819		Online Form	10/14/21	6-1
Anonymous Online Form - 1820		Online Form	10/14/21	4-3
Anonymous Online Form - 1821		Online Form	10/14/21	4-2
Anonymous Online Form - 1822		Online Form	10/14/21	6-1
Anonymous Online Form - 1823		Online Form	10/14/21	4-1

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1824		Online Form	10/14/21	4-61
Anonymous Online Form - 1825		Online Form	10/14/21	4-61
Anonymous Online Form - 1826		Online Form	10/14/21	4-1
Anonymous Online Form - 1827		Online Form	10/14/21	4-1
Anonymous Online Form - 1828		Online Form	10/14/21	4-61
Anonymous Online Form - 1829		Online Form	10/14/21	4-1
Anonymous Online Form - 1830		Online Form	10/14/21	4-61
Anonymous Online Form - 1831		Online Form	10/14/21	4-1
Anonymous Online Form - 1832		Online Form	10/14/21	4-61
Anonymous Online Form - 1833		Online Form	10/14/21	4-1
Anonymous Online Form - 1834		Online Form	10/14/21	4-61
Anonymous Online Form - 1835		Online Form	10/14/21	4-1
Anonymous Online Form - 1836		Online Form	10/14/21	4-61
Anonymous Online Form - 1837		Online Form	10/14/21	4-1
Anonymous Online Form - 1838		Online Form	10/14/21	4-61
Anonymous Online Form - 1839		Online Form	10/14/21	4-1
Anonymous Online Form - 1840		Online Form	10/14/21	4-1
Anonymous Online Form - 1841		Online Form	10/14/21	4-1
Anonymous Online Form - 1842		Online Form	10/14/21	4-61
Anonymous Online Form - 1843		Online Form	10/14/21	4-1
Anonymous Online Form - 1844		Online Form	10/14/21	4-61
Anonymous Online Form - 1845		Online Form	10/14/21	4-1
Anonymous Online Form - 1846		Online Form	10/14/21	4-61
Anonymous Online Form - 1847		Online Form	10/14/21	4-1
Anonymous Online Form - 1848		Online Form	10/14/21	4-61
Anonymous Online Form - 1849		Online Form	10/14/21	4-1
Anonymous Online Form - 1850		Online Form	10/14/21	4-61
Anonymous Online Form - 1851		Online Form	10/14/21	4-104
Anonymous Online Form - 1852		Online Form	10/14/21	4-1
Anonymous Online Form - 1853		Online Form	10/14/21	4-61
Anonymous Online Form - 1854		Online Form	10/14/21	6-11
Anonymous Online Form - 1855		Online Form	10/14/21	3-1
Anonymous Online Form - 1856		Online Form	10/14/21	4-1
Anonymous Online Form - 1857		Online Form	10/14/21	4-61
Anonymous Online Form - 1858		Online Form	10/14/21	7-133
Anonymous Online Form - 1859		Online Form	10/14/21	7-9
Anonymous Online Form - 1860		Online Form	10/14/21	4-1
Anonymous Online Form - 1861		Online Form	10/14/21	4-61
Anonymous Online Form - 1862		Online Form	10/14/21	4-1
Anonymous Online Form - 1863		Online Form	10/14/21	4-61
Anonymous Online Form - 1864		Online Form	10/14/21	4-1
Anonymous Online Form - 1865		Online Form	10/14/21	4-61
Anonymous Online Form - 1866		Online Form	10/14/21	4-1
Anonymous Online Form - 1867		Online Form	10/14/21	4-61
Anonymous Online Form - 1868		Online Form	10/14/21	4-1
Anonymous Online Form - 1869		Online Form	10/14/21	4-70
Anonymous Online Form - 1870		Online Form	10/14/21	4-104
Anonymous Online Form - 1871		Online Form	10/14/21	4-104
Anonymous Online Form - 1872		Online Form	10/14/21	4-61
Anonymous Online Form - 1873		Online Form	10/14/21	7-94
Anonymous Online Form - 1874		Online Form	10/14/21	7-133
Anonymous Online Form - 1875		Online Form	10/14/21	7-9
Anonymous Online Form - 1876		Online Form	10/14/21	4-67
Anonymous Online Form - 1877		Online Form	10/14/21	4-3
Anonymous Online Form - 1878		Online Form	10/14/21	4-1
Anonymous Online Form - 1879		Online Form	10/14/21	4-61
Anonymous Online Form - 1880		Online Form	10/14/21	4-1
Anonymous Online Form - 1881		Online Form	10/14/21	4-61
Anonymous Online Form - 1882		Online Form	10/14/21	6-54
Anonymous Online Form - 1883		Online Form	10/14/21	7-145
Anonymous Online Form - 1884		Online Form	10/14/21	7-115

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1885		Online Form	10/14/21	6-1
Anonymous Online Form - 1886		Online Form	10/14/21	6-11
Anonymous Online Form - 1887		Online Form	07/16/21	7-52
Anonymous Online Form - 1888		Online Form	07/16/21	6-1
Anonymous Online Form - 1889		Online Form	07/16/21	6-1
Anonymous Online Form - 1890		Online Form	07/16/21	4-3
Anonymous Online Form - 1891		Online Form	07/22/21	6-1
Anonymous Online Form - 1892		Online Form	07/22/21	7-101
Anonymous Online Form - 1893		Online Form	07/16/21	6-1
Anonymous Online Form - 1894		Online Form	07/16/21	4-3
Anonymous Online Form - 1895		Online Form	07/27/21	6-19
Anonymous Online Form - 1896		Online Form	07/27/21	4-10
Anonymous Online Form - 1897		Online Form	07/27/21	4-14
Anonymous Online Form - 1898		Online Form	07/27/21	6-18
Anonymous Online Form - 1899		Online Form	08/02/21	4-2
Anonymous Online Form - 1900		Online Form	08/02/21	4-22
Anonymous Online Form - 1901		Online Form	08/03/21	4-1
Anonymous Online Form - 1902		Online Form	08/03/21	4-8
Anonymous Online Form - 1903		Online Form	08/03/21	4-9
Anonymous Online Form - 1904		Online Form	08/03/21	4-21
Anonymous Online Form - 1905		Online Form	08/03/21	4-22
Anonymous Online Form - 1906		Online Form	08/04/21	4-47
Anonymous Online Form - 1907		Online Form	08/09/21	7-32
Anonymous Online Form - 1908		Online Form	08/09/21	7-2
Anonymous Online Form - 1909		Online Form	08/09/21	4-2
Anonymous Online Form - 1910		Online Form	08/09/21	4-3
Anonymous Online Form - 1911		Online Form	08/11/21	3-1
Anonymous Online Form - 1912		Online Form	08/11/21	7-99
Anonymous Online Form - 1913		Online Form	08/12/21	8-12, 8-1
Anonymous Online Form - 1914		Online Form	08/12/21	8-12, 8-1
Anonymous Online Form - 1915		Online Form	08/13/21	4-55
Anonymous Online Form - 1916		Online Form	08/13/21	6-11
Anonymous Online Form - 1917		Online Form	08/17/21	4-137
Anonymous Online Form - 1918		Online Form	08/17/21	4-2
Anonymous Online Form - 1919		Online Form	08/17/21	7-129
Anonymous Online Form - 1920		Online Form	08/17/21	6-1
Anonymous Online Form - 1921		Online Form	08/17/21	4-2
Anonymous Online Form - 1922		Online Form	08/18/21	7-133
Anonymous Online Form - 1923		Online Form	08/18/21	7-9
Anonymous Online Form - 1924		Online Form	08/18/21	4-1
Anonymous Online Form - 1925		Online Form	08/18/21	4-61
Anonymous Online Form - 1926		Online Form	07/17/21	4-55
Anonymous Online Form - 1927		Online Form	07/17/21	7-116
Anonymous Online Form - 1928		Online Form	08/23/21	4-1
Anonymous Online Form - 1929		Online Form	08/23/21	4-99
Anonymous Online Form - 1930		Online Form	08/23/21	4-3
Anonymous Online Form - 1931		Online Form	08/30/21	6-1
Anonymous Online Form - 1932		Online Form	08/30/21	6-3
Anonymous Online Form - 1933		Online Form	08/30/21	6-5
Anonymous Online Form - 1934		Online Form	08/31/21	6-3
Anonymous Online Form - 1935		Online Form	08/31/21	6-5
Anonymous Online Form - 1936		Online Form	08/31/21	7-52
Anonymous Online Form - 1937		Online Form	08/31/21	3-1
Anonymous Online Form - 1938		Online Form	09/01/21	6-1
Anonymous Online Form - 1939		Online Form	09/01/21	6-7
Anonymous Online Form - 1940		Online Form	09/02/21	6-58
Anonymous Online Form - 1941		Online Form	09/02/21	4-2
Anonymous Online Form - 1942		Online Form	07/17/21	6-3
Anonymous Online Form - 1943		Online Form	07/17/21	3-1
Anonymous Online Form - 1944		Online Form	09/08/21	4-3
Anonymous Online Form - 1945		Online Form	09/08/21	7-140

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Online Form - 1946		Online Form	09/09/21	5-19
Anonymous Online Form - 1947		Online Form	09/09/21	6-20
Anonymous Online Form - 1948		Online Form		4-22
Anonymous Online Form - 1949		Online Form		5-23
Anonymous Online Form - 1950		Online Form	10/06/21	5-10
Anonymous Online Form - 1951		Online Form	07/30/21	8-8, 8-6, 8-2, 7-133
Anonymous Online Form - 1952		Online Form	07/16/21	7-19, 6-1
Anonymous Petition - 1		Petition	Unknown	9-334
Anonymous Petition - 2		Petition	Unknown	9-334
Anonymous Petition - 3		Petition	Unknown	9-334
Anonymous Petition - 4		Petition	Unknown	9-334
Anonymous Petition - 5		Petition	Unknown	9-334
Anonymous Petition - 6		Petition	Unknown	9-334
Anonymous Petition - 7		Petition	Unknown	9-334
Anonymous Petition - 8		Petition	Unknown	9-334
Anonymous Petition - 9		Petition	Unknown	9-334
Anonymous Petition - 10		Petition	Unknown	9-334
Anonymous Petition - 11		Petition	Unknown	9-334
Anonymous Petition - 12		Petition	Unknown	9-334
Anonymous Petition - 13		Petition	Unknown	9-334
Anonymous Petition - 14		Petition	Unknown	9-334
Anonymous Petition - 15		Petition	Unknown	9-334
Anonymous Petition - 16		Petition	Unknown	9-334
Anonymous Petition - 17		Petition	Unknown	9-334
Anonymous Petition - 18		Petition	Unknown	9-334
Anonymous Petition - 19		Petition	Unknown	9-334
Anonymous Petition - 20		Petition	Unknown	9-334
Anonymous Postcard 1		Postcard	Unknown	7-32, 7-89, 7-129
Anonymous Postcard 2		Postcard	Unknown	9-264, 7-27, 7-133
Anonymous Postcard 3		Postcard	Unknown	7-27, 7-142, 7-131
Anonymous Postcard 4		Postcard	Unknown	7-4, 7-27, 7-129
Anonymous Postcard 5		Postcard	Unknown	7-27, 7-142, 7-129
Anonymous Postcard 6		Postcard	Unknown	7-149, 7-133, 7-131
Anonymous Postcard 7		Postcard	Unknown	7-138, 7-133, 4-46
Anonymous Postcard 8		Postcard	Unknown	7-138, 7-133, 7-131
Anonymous Postcard 9		Postcard	Unknown	7-6, 7-138, 4-46
Anonymous Postcard 10		Postcard	Unknown	7-148, 7-148, 7-141, 7-133
Anonymous Postcard 12		Postcard	Unknown	7-6, 7-141, 6-3
Anonymous Postcard 13		Postcard	Unknown	7-9, 7-27, 7-129, 4-1
Anonymous Postcard 14		Postcard	Unknown	7-133
Anonymous Postcard 15		Postcard	Unknown	7-149, 7-138, 7-133
Anonymous Postcard 16		Postcard	Unknown	7-133, 7-131, 4-54, 4-104
Anonymous Postcard 17		Postcard	Unknown	7-84, 7-133, 4-54, 7-32, 4-104
Anonymous Postcard 18		Postcard	Unknown	7-6, 7-32, 7-138
Anonymous Postcard 19		Postcard	Unknown	7-149, 7-133, 4-46
Anonymous Postcard 20		Postcard	Unknown	7-133, 7-131, 4-46
Anonymous Postcard 21		Postcard	Unknown	7-32, 7-138, 7-133
Anonymous Postcard 22		Postcard	Unknown	4-2
Anonymous Postcard 23		Postcard	Unknown	7-6, 7-141, 6-3
Anonymous Postcard 24		Postcard	Unknown	7-149, 7-133, 7-131
Anonymous Postcard 25		Postcard	Unknown	7-6, 7-138, 4-46
Anonymous Postcard 26		Postcard	Unknown	7-138, 7-133, 7-131
Anonymous Postcard 27		Postcard	Unknown	7-6, 7-138, 7-133
Anonymous Postcard 28		Postcard	Unknown	7-133, 7-131, 4-46
Anonymous Postcard 29		Postcard	Unknown	7-32, 7-138, 7-133
Anonymous Postcard 30		Postcard	Unknown	7-6, 7-32, 7-138
Anonymous Postcard 31		Postcard	Unknown	7-149, 7-133, 4-46
Anonymous Postcard 32		Postcard	Unknown	7-142, 7-131, 4-104, 4-46, 7-9, 7-32
Anonymous Postcard 33		Postcard	Unknown	9-264, 7-27, 7-131, 7-9, 7-21
Anonymous Postcard 34		Postcard	Unknown	7-27, 7-27, 7-129, 7-21, 8-3
Anonymous Postcard 35		Postcard	Unknown	9-264, 7-27, 7-133

Appendix M-5, Section 10: List of Commenters

Last name/ Affiliation	First Name	Comment Type	Date	Response Number(s)
Anonymous Postcard 36		Postcard	Unknown	7-32, 7-133
Anonymous Postcard 37		Postcard	Unknown	7-27, 7-142, 7-129
Anonymous Postcard 38		Postcard	Unknown	7-27, 7-142, 7-131
Anonymous Postcard 39		Postcard	Unknown	7-9, 7-32, 7-129
Anonymous Postcard 40		Postcard	Unknown	7-149, 7-138, 7-133
Anonymous Postcard 41		Postcard	Unknown	7-27, 7-27, 7-138, 7-21
Anonymous Postcard 42		Postcard	Unknown	7-27, 7-148, 7-141
Anonymous Postcard 43		Postcard	Unknown	7-138, 7-133, 4-46
Anonymous Postcard 44		Postcard	Unknown	8-3
Anonymous Postcard 45		Postcard	Unknown	7-84, 7-133, 4-54
Anonymous Postcard 46		Postcard	Unknown	7-84, 7-133, 4-54, 7-32, 4-104
Anonymous Postcard 47		Postcard	Unknown	7-32, 7-138, 4-46
Anonymous Postcard 48		Postcard	Unknown	7-133, 7-131, 7-129, 4-1
Anonymous Postcard 49		Postcard	Unknown	7-89, 7-141, 4-54
Anonymous Postcard 50		Postcard	Unknown	7-89, 7-141, 4-54
Anonymous Postcard 51		Postcard	Unknown	7-32, 7-27, 7-131
Anonymous Voicemail - 1		Voicemail	07/29/21	3-1
Anonymous Voicemail - 2		Voicemail	07/27/21	3-1
Anonymous Voicemail - 3		Voicemail	08/17/21	2-1
Anonymous Voicemail - 4		Voicemail	09/01/21	3-1
Anonymous Voicemail - 5		Voicemail	07/27/21	3-1
Anonymous Voicemail - 6		Voicemail	09/28/21	4-71
Anonymous Voicemail - 7		Voicemail	10/01/21	4-2
Anonymous Voicemail - 8		Voicemail	10/14/21	6-11
Anonymous Voicemail - 9		Voicemail	10/14/21	7-52
Anonymous Voicemail - 10		Voicemail	10/14/21	4-1
Anonymous Voicemail - 11		Voicemail	10/10/21	4-2
Anonymous Voicemail - 13		Voicemail	10/14/21	7-27
Anonymous Voicemail - 14		Voicemail	10/13/21	5-10
Anonymous Voicemail - 15		Voicemail	10/14/21	7-62, 4-2, 3-1
Anonymous Voicemail - 16		Voicemail	10/12/21	7-52
Anonymous Written Form - 1		Written Form	08/26/21	5-10
Anonymous Written Form - 2		Written Form	08/18/21	6-3
Anonymous Written Form - 3		Written Form	07/23/21	7-32