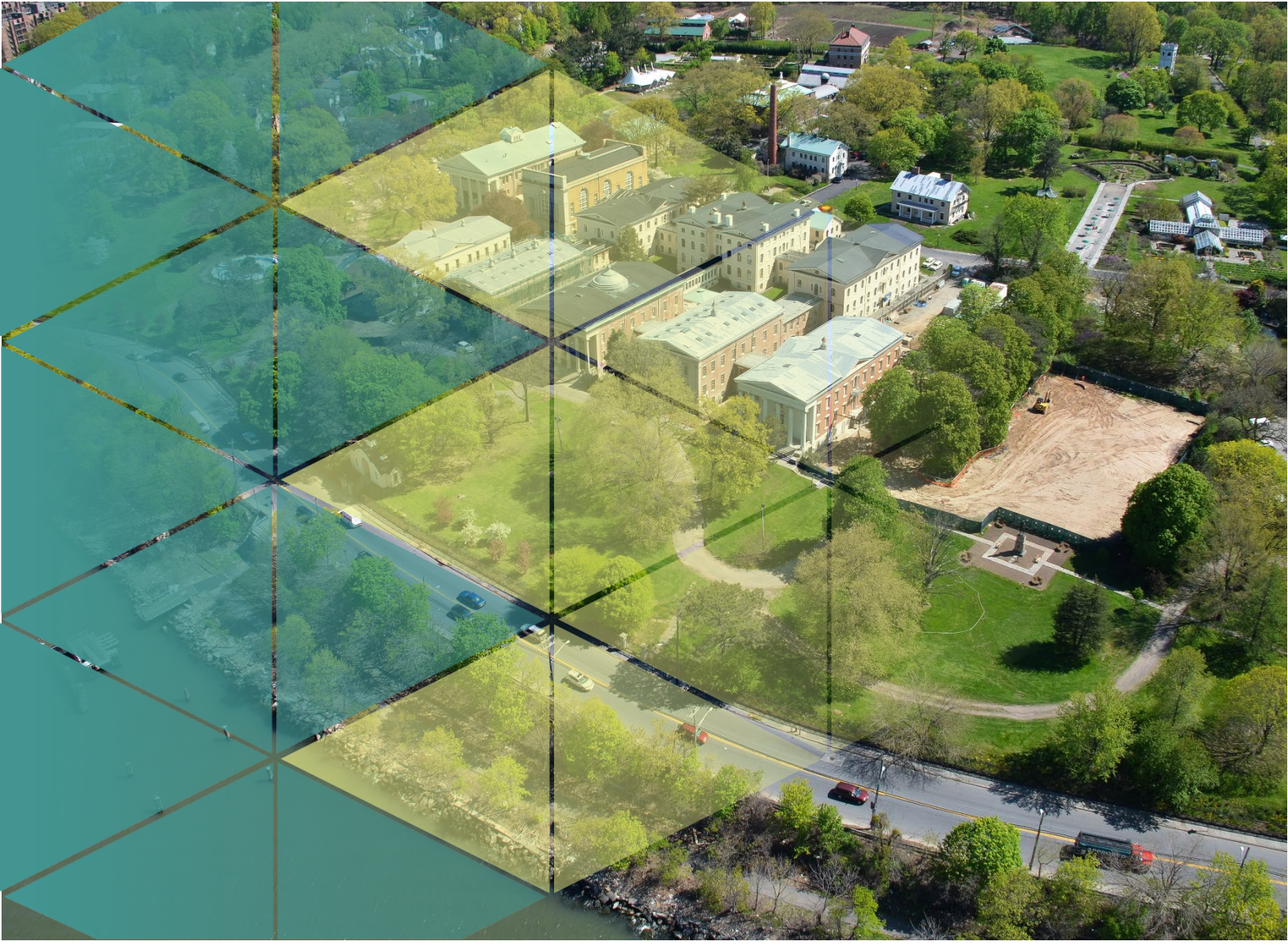

STATEN ISLAND
NORTH SHORE
BRT

Environmental Impact Statement
Final Scoping Document

October 2023

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Foreword[1]

This Final Scoping Document represents the content of the Draft Scoping Document issued by Metropolitan Transportation Authority (MTA) to the public in September 2019 but with that content edited to reflect editorial changes made following the close of the public comment period on November 18, 2019. The Final Scoping Document also includes a new appendix, Appendix A, "Response to Public Comments on the Draft Scoping Document (September 2023)."

The editorial changes include changing text references from "Draft" to "Final," as appropriate, and incorporating new information developed by MTA in response to public comments on the Draft Scoping Document and reflecting changes made by MTA in its planned analytical methodologies for the Environmental Impact Statement (EIS).

In addition, based on consultation with the Federal Transit Administration (FTA), MTA and the FTA have agreed that if federal funding is sought for the Proposed Project, NEPA will occur subsequent to and separately from New York's State Environmental Quality Review Act (SEQRA) process. Therefore, this Final Scoping Document presents the proposed framework for the Environmental Impact Statement (EIS) analysis in accordance with SEQRA.

[1] This Foreword is new to the Final Scoping Document

1 Introduction

The Metropolitan Transportation Authority (MTA) will prepare an Environmental Impact Statement (EIS) for the Staten Island North Shore Bus Rapid Transit (BRT) Project (the Proposed Project) in accordance with New York's State Environmental Quality Review Act (SEQRA). As the lead agency under SEQRA, MTA has developed this document to define the scope of the EIS. This Final Scoping Document: includes a description of the Proposed Project and the actions necessary for its implementation, presents the proposed framework for the EIS analysis; and, discusses the procedures to be followed in the preparation of the EIS. A Draft Scoping Document was made available to agencies and the public for review and comment. This Final Scoping Document considers comments received during the comment period and incorporates any appropriate changes into the analysis that will be used in the preparation of the EIS.

Project Overview

The environmental analysis of the Proposed Project will assess the implementation of new and enhanced public transit service along the North and West Shores of Staten Island (see Figure 1) between South Avenue (West Shore Plaza, located near the intersection of South Avenue and Chelsea Road) and St. George (St. George Terminal, located near the intersection of Richmond Terrace and Bay Street) in Richmond County, New York. The approximately 8-mile proposed alignment would be comprised of approximately 5.3 miles of right-of-way (ROW) from the former North Shore Railroad and approximately 2.7 miles of City roadways. As shown in Figure 1 and Figure 2, the proposed alignment includes at-grade, elevated viaduct, and below grade open-cut sections, with street-running portions along South Avenue (mixed-traffic) and Richmond Terrace (exclusive two-lane median busway).

Figure 1. Staten Island North Shore Proposed Alignment

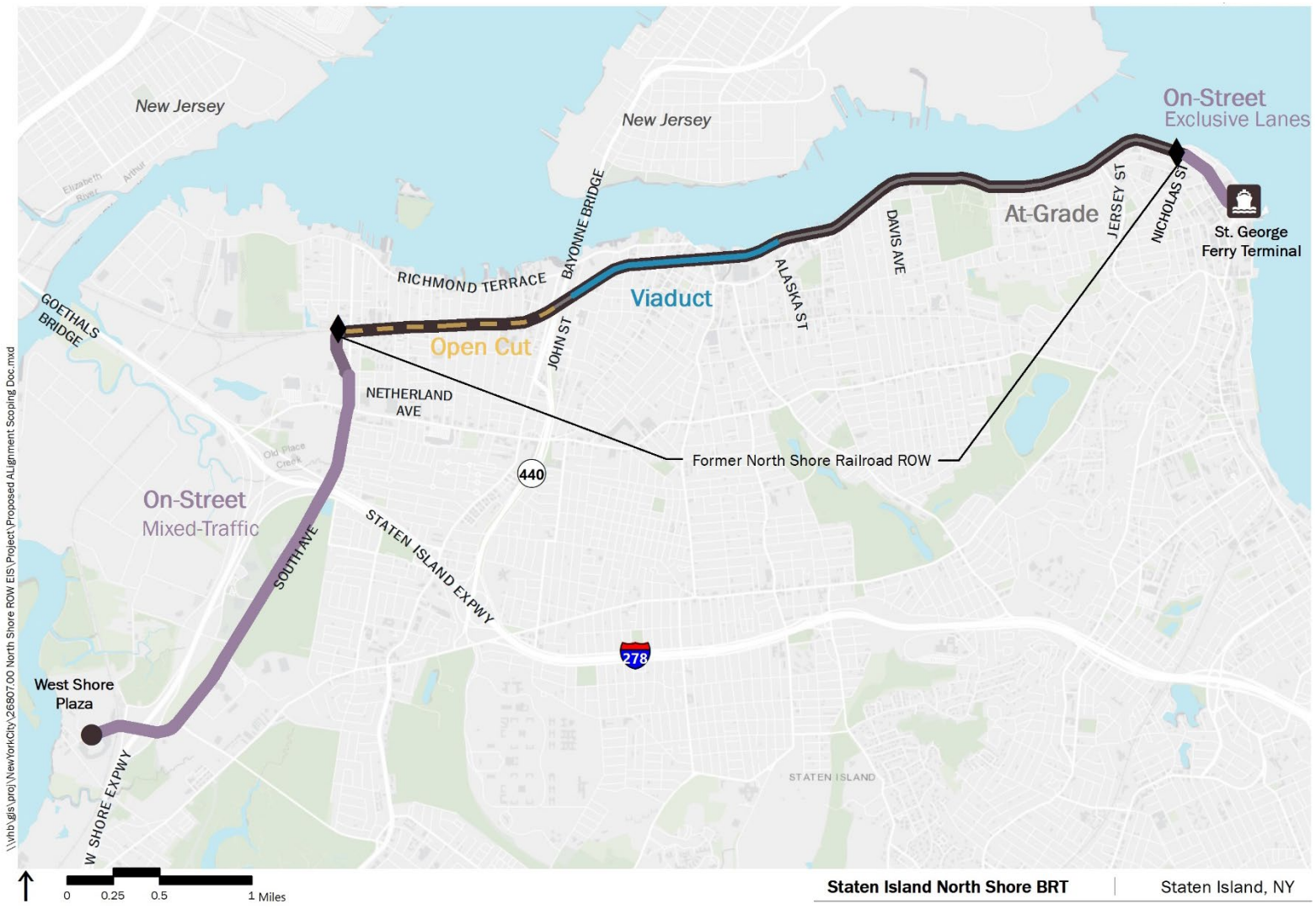


Figure 2. Photographs of the Proposed Alignment

On-Street (Exclusive Lanes): View of Richmond Terrace looking west

At-Grade: View of ROW and destabilized shoreline near Snug Harbor

At-Grade: View of Bank Street; Richmond Terrace at left

Viaduct: View of Richmond Terrace looking south from viaduct

Figure 2. Photographs of Proposed Alignment (continued)

Viaduct: View of remnant station on viaduct segment of ROW

Open-Cut: View of western portion of open-cut section (freight use)

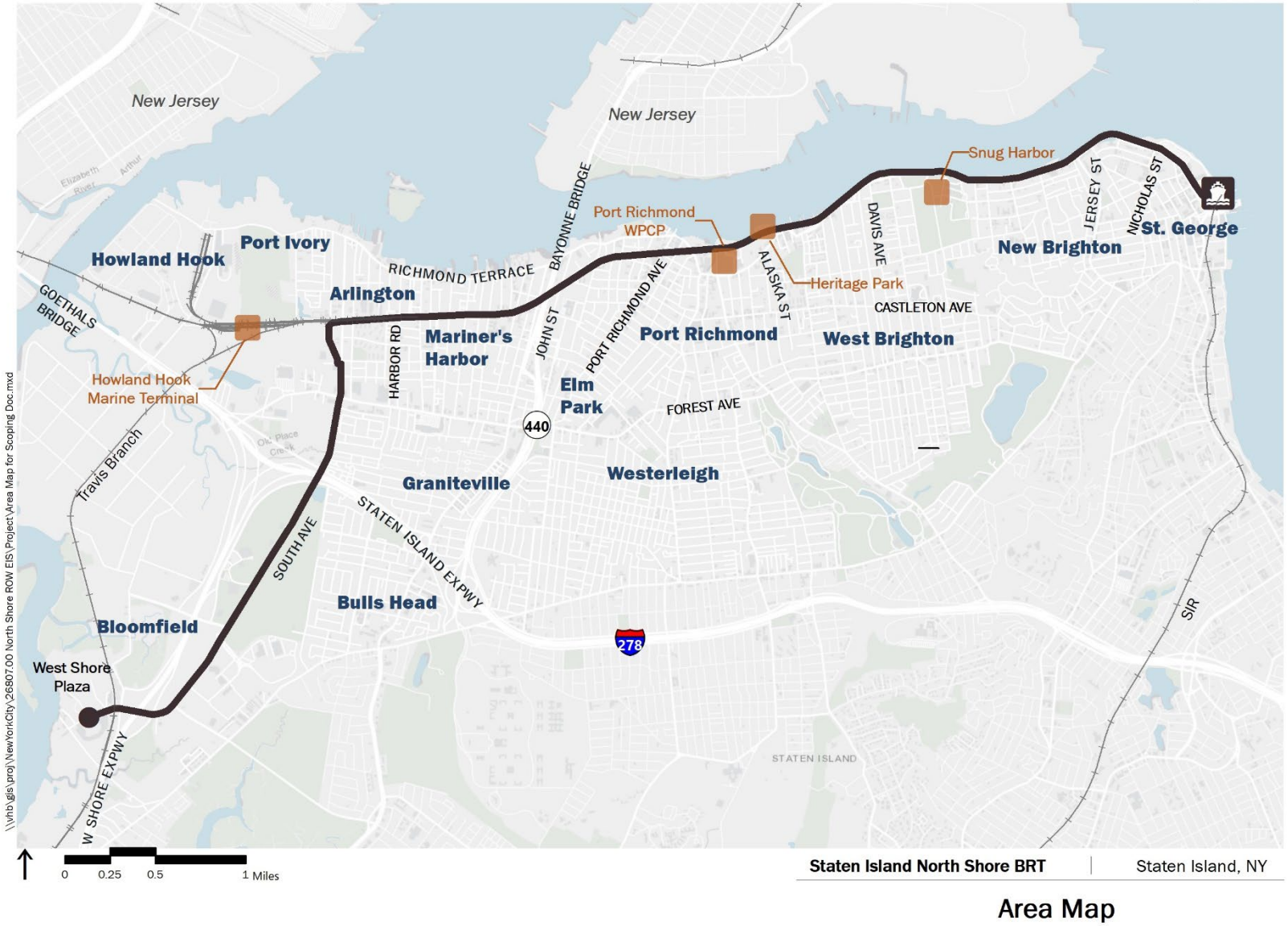
Open-Cut: View of overhead bridge and abutments in open-cut section

On-Street Mixed-Traffic: View of South Avenue

The Staten Island North Shore Alternatives Analysis (SINSAA), completed in 2012, as well as several concurrent and subsequent planning studies, have identified key, pervasive transportation issues that continue to exist in the North Shore and West Shore areas of Staten Island. These issues are described in Chapter 2, Purpose and Need of this Final Scoping Document. The SINSAA evaluated alternatives to address the identified needs, which are described in Chapter 3, Proposed Project and Alternatives. These alternatives were revisited in the June 2019 Supplement to the 2012 SINSAA (the "Supplement"), which identified Bus Rapid Transit (BRT) as the Preferred Alternative. The Proposed Project would address the existing transportation needs and meet the demand for expanded transportation capacity through improved and priority transit service. Use of the former North Shore Railroad ROW would provide more consistent and reliable travel times and would improve transit access, capacity and connectivity between North Shore and West Shore activity and residential centers and the St. George Terminal. St. George Terminal provides on-island transfers between the Staten Island Railway (SIR) and connections to MTA bus routes as well as off-island transfers to Lower Manhattan via the New York City Department of Transportation's (NYCDOT) Staten Island Ferry.

The proposed alignment would extend through and serve an area comprised of several neighborhoods along the North and West Shores, including Arlington, Mariners Harbor, Elm Park, Port Richmond, West Brighton, New Brighton, and St. George (see Figure 3). Community Board 1 and parts of Community Board 2 comprise the study area. These neighborhoods are characterized by varied land use patterns, highlighted by civic and commercial clusters in St. George and Port Richmond, and historic Snug Harbor's well-established cultural uses. Other prevalent land uses include parkland such as Heritage Park, housing developments, and a waterfront industrial sector featuring an array of maritime support services as well as the city's Port Richmond Wastewater Resource Recovery Facility (WRRF). The Port Authority of New York and New Jersey's (PANYNJ) Howland Hook Marine Terminal is a major freight terminal and container port at the western end of the proposed alignment, and both the Teleport and Matrix Global Logistics Park are significant business parks on the West Shore.

Figure 3. Area Map



In St. George, significant economic growth has occurred and is occurring, such as the Empire Outlets retail center and mixed-use developments which complement existing municipal, residential and educational land uses.

The North Shore roadway network includes the two-lane Richmond Terrace, which is the area's primary east-west roadway running primarily along the shoreline. Other notable streets include Forest Avenue, Castleton Avenue, and the Staten Island Expressway (I-278), which connects Staten Island with New Jersey via the Goethals Bridge. North-south access routes between the North Shore and points south include South Avenue, Harbor Road, NY Route 440 (which connects Staten Island with New Jersey via the Bayonne Bridge), Port Richmond Avenue, and Jersey Street.

MTA operates an extensive network of local and limited bus routes that serve the entire borough (http://web.mta.info/nyct/maps/bussi.pdf). The four-primary local/limited bus routes that link the North Shore with the St. George Terminal are the S40/90, S44/94, S46/96, and S48/98. The terminal is currently served by 22 NYCT bus routes and provides connections to lower Manhattan via the Staten Island Ferry and the MTA SIR, which is the borough's only passenger rail line, serving communities between St. George and Tottenville.

The former North Shore Railroad right-of-way offered Staten Island Rapid Transit passenger and freight service ending in 1953 and 1989, respectively. In 1993, the City of New York acquired the North Shore right-of-way via a federal grant preserving the corridor for transportation use. Currently, the right-of-way, managed by the New York City Economic Development Corporation (NYCEDC), is largely abandoned except for the portion of the western section of the right-of-way that is used as a tail track which serves rail freight supporting the PANYNJ Howland Hook Marine Terminal.

Regulatory Framework

The environmental review process allows decision-makers to systematically consider environmental effects of the Proposed Project, to evaluate reasonable alternatives, and to identify measures to mitigate significant adverse environmental effects. As discussed in the Introduction, the EIS for the Proposed Project will be prepared in accordance with SEQRA, codified in

Article 8 of the Environmental Conservation Law (ECL §§ 8-0101 *et seq*.), and its implementing regulations, promulgated in Part 617 of Title 6 of the New York Codes, Rules and Regulations—which collectively contain the requirements for the SEQRA process. Analytical methodologies for evaluating baseline environmental conditions and project-related impacts will be consistent with the guidelines set forth in the New York *2021 City Environmental Quality Review (CEQR) Technical Manual*, where applicable, as described below. These are the most appropriate methodologies and guidelines for environmental impact assessment in New York City.

The Proposed Project may apply for federal funding from FTA. If the MTA intends to seek federal funding to support the capital construction of the Build Alternative, the Proposed Project will require a separate analysis under the requirements of the National Environmental Policy Act of 1969 (NEPA). The FTA would be the lead agency for NEPA compliance. MTA and the FTA have agreed that NEPA will occur subsequent to and separately from the SEQRA process.

According to FTA guidance, *early scoping* may be initiated prior to an NOI if there is appropriate public notice and sufficient project information available so that the public and relevant agencies can participate effectively. Incorporating environmental review process considerations (e.g., purpose and need, alternatives, significant environmental issues) during the project planning stage can also be referred to as *early scoping* when the scope of environmental issues associated with a project are being determined, as is the case with this project. Conducting preliminary data analysis and requesting input from the public and agencies on issues before NEPA begins can also be considered as early scoping. Coordination between the FTA and MTA occurred and *early scoping* (satisfied by data collection and outreach to support the SEQRA scoping process) was agreed upon by the FTA and MTA. The FTA published an early scoping notice in the Federal Register on September 30, 2019.[2]

[2] FTA Early Scoping Guidance https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/environmental-programs/55956/03-early-scoping.pdf

Scoping Meetings and Opportunity for Public Comment

MTA sought input and comments on the following:

- Purpose & Need
- Goals & Objectives
- Proposed Actions
- Analyses to be included and impact methodologies to be utilized in the environmental review for the Proposed Project
- Opportunities for agency involvement and public comment
- Any additional concerns related to potential project-related environmental impacts

The public were provided with an opportunity to offer input on the topics identified above during a 60-day public scoping comment period. The public scoping comment period began on September 18, 2019 and ended on November 18, 2019. Opportunities for public comment during the scoping period are detailed below.

A project scoping Public Meeting was held on Thursday, October 17, 2019 from 6:00 pm to 8:30 pm at the Snug Harbor Cultural Center & Botanical Gardens, Lower Great Hall, 1000 Richmond Terrace, Staten Island, New York 10301. Members of the public, agency representatives, and elected officials had the opportunity to: view project materials, attend a scoping presentation, meet with MTA representatives and provide oral and/or written comments on the Draft Scoping Document.

Public and agency written comments could be submitted through the end of the public comment period closing at 5:00 pm EST on November 18, 2019 via the following:

- Project website feedback form found at https://new.mta.info/system_modernization/northshoreeis
- Email: NorthShoreEIS@nyct.com
- Phone: 511 (MTA General Call Center)

Mail: MTA
Staten Island North Shore EIS
C/O Government & Community Relations
2 Broadway, D17.112
New York, NY 10004

After the scoping comment period ended, this Final Scoping Document was prepared to identify comments received during the scoping period and provide responses to comments. This Final Scoping Document is available to the public. The SEQRA Draft EIS (DEIS) will then be prepared in accordance with this Final Scoping Document.

Once MTA, as lead agency, is satisfied that the DEIS is complete, it will be made available for public review and comment. MTA will prepare a Notice of Completion, which will be published in the Environmental Notice Bulletin and local newspapers, and distribute the DEIS. A copy of the DEIS will be posted on the MTA website consistent with 6 NYCRR 617.12. A public hearing may be held on the DEIS to afford all interested parties the opportunity to submit oral and written comments. MTA will maintain a record of all comments received during the DEIS public comment period.

At the close of the 30-day public comment period, a Final EIS (FEIS) will be prepared that will respond to all comments made on the DEIS, along with any revisions to the technical analyses necessary to respond to those comments. The FEIS will include a separate chapter summarizing the comments received and referencing the MTA responses to the comments. Upon issuance of the FEIS, MTA will also issue a Statement of Findings to the MTA Board of Directors for their consideration. In addition, the City of New York may utilize the SEQRA FEIS to make CEQR findings should it be determined that potential city actions are required to facilitate the Proposed Project (see Chapter 4, Environmental Analysis Framework).

Organization of this Document

In accordance with Title 6 NYCRR 617.8, *Scoping*, this Final Scoping Document will help focus the environmental review process on potentially significant impacts. Early and open scoping will benefit the Proposed Project by establishing a framework for the EIS, eliminating the consideration of impacts that are irrelevant or not significant, and taking into consideration input from involved agencies (e.g., New York City Department of City Planning, New York City Department of Parks and Recreation, Small Business Services, New York City Department of Transportation) and the public.

This Final Scoping Document is organized in the following manner:

- **Chapter 1: Introduction.** Introduces the reader to the Proposed Project, discusses the procedures to be followed in the preparation of the EIS, describes the public outreach completed to date, and specifies how agencies and the public will be invited to participate during the scoping process.
- **Chapter 2: Purpose and Need.** Summarizes the background and history of the Proposed Project, describes the project's purpose and why it is needed, and presents the project's goals and objectives.
- **Chapter 3: Proposed Project and Alternatives.** Chronicles the identification, development, and evaluation of alternatives in the environmental review process and provides additional detail on the Proposed Project.
- **Chapter 4: Environmental Analysis Framework.** Presents the proposed framework for the EIS analysis, which closely follows the guidance of the *CEQR Technical Manual*.
- **Chapter 5: EIS Scope of Work.** Describes the methodologies that will be used to conduct the required analyses. Any environmental requirements necessary as part of the Proposed Project will also be identified.
- **Chapter 6: Agency and Public Involvement.** Describes how involved and interested agencies and the public will be involved throughout the environmental review process, including opportunities for open, collaborative, and meaningful participation.

2 Purpose and Need

Background

The Proposed Project would primarily serve residents, business and neighborhoods along the North Shore as well as West Shore employment centers along South Avenue.

Several planning studies, including the 2012 *Staten Island North Shore Alternatives Analysis (SINSAA)*[3], *North Shore 2030*[4], *Working West Shore 2030*[5], and studies for the Port Richmond and West Brighton Brownfield Opportunity Areas (BOAs),[6] [7] have identified pressing transportation-related issues within the North and West Shores of Staten Island. The North Shore has a discontinuous street grid that physically constrains the roadway network, with only one east-west route—Richmond Terrace—running the east-west length of Staten Island north of the Staten Island Expressway (I-278) as shown in Figure 3. This limited network is inadequate to accommodate the

[3] MTA. Staten Island North Shore Alternatives Analysis. 2012
[4] NYC Planning. North Shore 2030. https://www.nyc.gov/site/planning/plans/north-shore/north-shore.page. Accessed on May 17, 2023.
[5] NYC Planning. Working West Shore 2030. https://www.nyc.gov/site/planning/plans/west-shore/west-shore.page Accessed on May 17, 2023.
[6] NYC Planning. Port Richmond Brownfield Opportunity Area https://www1.nyc.gov/site/planning/plans/port-richmond-boa/port-richmond-boa.page Accessed on May 17, 2023.
[7] NYC Planning. West Brighton BOA Nomination Report. May 4, 2016 https://www1.nyc.gov/site/planning/plans/west-brighton-boa/west-brighton-boa.page Accessed on May 17, 2023.

shared movement of automobiles, trucks, bicycles, pedestrians and transit vehicles.

Demand for transit among North Shore residents is high and growing. According to the New York City Community District Profiles, the North Shore's population is nearly twice as dense as Staten Island's overall population, more racially and economically diverse, and considerably more transit-reliant.[8] However, the North Shore's constrained infrastructure makes it difficult to serve the area's transit needs efficiently. Service on the area's four primary bus routes (S40/S90, S44/S94, S46/S96, and S48/S98) is characterized by: overcrowding of buses during peak commute periods; inconvenient transfers between travel modes; and lack of reliability, with nearly two-thirds of bus trips running five or more minutes late. The potential to add future transit capacity to meet growing demand is severely constrained by the physical limitations of the existing roadway network.

These limitations on expanded transit capacity inhibit local economic growth and the quality of life for residents along the North and West Shores. Providing a direct, reliable transit connection along South Avenue and across the North Shore (between the West Shore and St. George) would help address service and capacity issues, support economic growth, and support projected ridership demand. Such a connection would provide faster and more consistent travel times and improve overall transit access and connectivity between the commercial hub at West Shore Plaza, various existing and planned West Shore and North Shore activity centers such as the Teleport Business Park, Matrix Global Logistics Park, Snug Harbor Cultural Center, civic and commercial concentrations in St. George, and the St. George Terminal.

Purpose of the Project

The purpose of the Proposed Project is to:

» Provide frequent, efficient, and reliable transit to serve growing demand on the North and West Shores of Staten Island.

[8] NYC Planning. Community District Profiles: Staten Island Community District 1 https://communityprofiles.planning.nyc.gov/staten-island/1. Accessed on May 11, 2023.

- Facilitate improved connections between Staten Island neighborhoods and existing North and West Shore activity centers, industries, and employment centers.
- Offer a reliable and cost-effective transportation solution that supports adopted City and community-endorsed public policy initiatives. such as the North Shore 2030[9], pertaining to economic growth and development.
- Maximize transportation use of the former and currently unused North Shore Railroad right-of-way while minimizing property acquisition and disruption to the community and businesses.

Need for the Project

The North and West Shores have a high demand for public transit that is expected to grow in the future. This demand is not effectively served by existing transit routes, which creates a need for transit improvements, as described below.

Public transportation demand is higher on the North Shore than the rest of Staten Island.

Staten Island's North Shore (Community District 1) is home to about 38 percent of Staten Island's nearly 493,194 residents. Approximately 32 percent of North Shore residents aged 16 or older use public transportation to commute to work—notably more than other Staten Islanders.[10] Approximately 68 percent of the transit commuters on the North Shore use the bus as their mode of transport to work. The four, primary east-west bus routes serving the area carried a combined average of more than 23,000 riders on an average weekday in 2019.[11] Many peak-hour buses are crowded (operating over capacity), and in some cases buses bypass stops because they are too full to serve waiting passengers. Approximately 64 percent of morning peak-hour (eastbound) trips on the S40 route operate

[9] NYC Planning. North Shore 2030. https://www.nyc.gov/site/planning/plans/north-shore/north-shore.page Accessed on May 17, 2023.
[10] US Census Bureau. *American Community Survey.* 2017-2021 American Community Survey 5-year Estimates. Accessed from data.census.gov. Accessed on March 23, 2023.
[11] MTA New York City Transit. *Average Weekday Bus Ridership* http://web.mta.info/nyct/facts/ridership/ridership_bus.htm. Accessed on May 5, 2023.

over capacity; significant crowding is also experienced in the evening peak (54 percent of trips).[12]

The demographic characteristics of the North Shore—including a higher poverty rate and lower car ownership than Staten Island overall—are consistent with high use of transit.

With a study area population that is 74.5 percent non-white and 32.1 percent low income—which is higher than in Community District 1 and Staten Island overall—the North Shore meets New York State's definition of a Potential Environmental Justice Area (PEJA).[13] Studies conducted in 2015 by the Pew Research Center have shown that in urban areas, people who are lower-income, black or Hispanic, or immigrants are much more likely than non-Hispanic white adults to use public transportation on a regular basis.[14] In addition, while only 15.4 percent of Staten Island households do not own at least one vehicle, almost 24 percent of households in Community District 1 are non-vehicle owners.[15] This rate is markedly higher than in either Community District 2 (13.5 percent) or Community District 3 (7.8 percent), indicating that North Shore residents are transit-dependent to a greater degree than residents in other areas of the borough.[16] These factors, combined with the high percentage of North Shore commuters currently using public transportation, means there will continue to be a strong demand for, and reliance on, public transportation in this area.

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[12] Over capacity as represented by 55 or more passengers on a standard size bus,

[13] Census Reporter. NYC-Staten Island Community District 1 PUMA https://censusreporter.org/profiles/79500US3603903-nyc-staten-island-community-district-1-port-richmond-stapleton-mariners-harbor-puma-ny/. Accessed on December 4, 2019

[14] Monica Anderson. Pew Research Center. April 7, 2016. *Who Relies on Public Transit in the U.S.* Access from https://www.pewresearch.org/fact-tank/2016/04/07/who-relies-on-public-transit-in-the-u-s/. Accessed on December 4, 2019.

[15] North Shore demographic data was derived from U.S. Census Public Use Microdata Area (PUMA) data; PUMA 3903 - Port Richmond, Stapleton & Mariner's Harbor covers an area that is geographically coterminous with Staten Island Community District 1.

[16] US Census Bureau. *American Community Survey.* Accessed from data.census.gov. 2017-2021 American Community Survey. Accessed on March 23, 2023.

Commutes on Staten Island and the North Shore are longer and more circuitous than those in New York City as a whole.

Many Staten Islanders—especially those who commute off-island—have long commutes involving multiple transit modes. Currently, the mean travel time to work for residents of Staten Island is 44.5 minutes, which is the longest commute time of any borough and longer than the citywide mean of 41.4 minutes. On the North Shore, nearly 45 percent of residents spend 45 minutes or longer commuting each way to work, and almost 27 percent have commutes of an hour or longer.[17]

The length and complexity of transportation routes on Staten Island contribute to long commutes for residents. Four of the ten longest bus routes in New York City operate in Staten Island. Two of the Staten Island routes operate within North Shore communities and are far longer than the citywide bus route average of 6.8 miles.[18] More specifically, the S59 bus route (16 miles) provides service to Port Richmond Terminal and the S54 (11.5 miles) serves West Brighton (Richmond Terrace & Broadway). Compounding the length of these routes is their circuitous nature; local Staten Island bus routes average 13 turning movements per route, which is the highest average number of turns for buses in any borough.

Because ferry and rail service are accessed via the St. George Terminal, most North Shore residents must travel east-west by bus to reach these services. Approximately two-thirds of transfers on the four primary local bus routes (S40, S44, S46, S48) occur at the St. George Terminal. North Shore residents who travel to off-island employment destinations via the Staten Island Ferry are affected by the long travel times and on-time performance issues of existing bus routes, which increase the difficulty of consistently making timely ferry connections. Overall, between 25 and 30 percent of all S40 trips (eastbound and westbound) are late throughout the day. These on-time performance issues are exacerbated in the peak periods, especially during the evening peak, when over half of the westbound S40 trips are late. This

[17] US Census Bureau. *Table S0801 Commuting Characteristics by Sex ACS 2017-2021 5-year*. Accessed from data.census.gov. Accessed March 23, 2023.

[18] Office of the New York City Comptroller. Bureau of Policy and Research. *The Other Transit Challenge: How to Improve the NYC Bus System*. November 2017. https://comptroller.nyc.gov/reports/the-other-transit-crisis-how-to-improve-the-nyc-bus-system/#_ednref18 Accessed on June 10, 2019.

highlights the need to enhance multi-modal connectivity between bus service, ferry service, and Staten Island Railway service at the St. George Terminal.

Transit demand will increase in the future as growth continues in North Shore communities and as the population ages.

The population of Staten Island and the North Shore are expected to continue growing, creating additional demand for public transit. Based on the latest available City estimates, Staten Island's population is projected to increase by 2.9 percent (from 487,155 to 501,109) between 2020 and 2040.[19] North Shore's population has been increasing faster than that of Staten Island overall. Between 2011 and 2021, Community District 1 grew by approximately 6.8 percent, compared to 4.9 percent for the borough as a whole.[20] This growing population is expected to increase the demand for transit among North Shore residents, who, as described previously, are generally more reliant on public transit.

While the population of Staten Island is growing, it is also becoming steadily older. Based on the City's latest population projections, the number of Staten Islanders aged 65 years or over is expected to grow from 77,644 in 2020 to 97,883 by 2040, an increase of approximately 26 percent.[21] This increase is the second largest of any borough (after The Bronx), and significantly greater than the 20 percent increase projected for New York City as a whole. While many factors influence older adults' use of public transit, research shows that transit can provide older adults who choose not to or are unable to drive with a means of independent travel and improved mobility.[22] Transit is also vital to connecting older adults to health care and other community resources.

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[19] New York City Department of City Planning. *New York City Population Projections by Age/Sex & Borough 2010-2040* https://www1.nyc.gov/assets/planning/download/pdf/data-maps/nyc-population/projections_report_2010_2040.pdf. Accessed on March 23, 2023.

[20] US Census Bureau. Accessed from data.census.gov. Accessed on March 23, 2023.

[21] https://www.census.gov/quickfacts/richmondcountystatenislandboroughnewyork

[22] University Transportation Research Center Region 2. *Access to Public Transit and Its Influence on Ridership for Older Adults in Two U.S. Cities*. http://www.utrc2.org/sites/default/files/pubs/access-transit-ridership-older-adults-journal_0.pdf Accessed June 10, 2019.

Adopted plans for the North Shore and all of Staten Island have established economic development goals that require efficient, reliable transportation.

The North Shore has a diverse range of commerce that includes maritime industries, light industrial activities, service businesses, educational and historic centers, and neighborhood commercial centers. The area has experienced substantial economic growth in recent years as the borough has rebounded from the damage caused by Superstorm Sandy. Between 2012 and 2017, employment on all of Staten Island grew by 11,000 jobs; taxable sales in the same period grew by 16 percent, with the North Shore experiencing the fastest growth in the borough at 22 percent[23]. Several large redevelopment programs are underway in the St. George area, and recently completed warehouse facilities for Amazon and Ikea at Phase 1 of the Matrix Global Logistics Park on the West Shore are expected to employ more than 4,000 workers. From 2006 to 2016, the number of Staten Islanders commuting within the borough has increased by 30 percent. This underscores the need for frequent and reliable transit service to move residents and workers between neighborhoods and employment centers both on and off the island.

Recent planning efforts seek to continue these economic development trends. The *North Shore 2030* study identified several economic growth objectives, including job creation and retention, the future reuse of the former North Shore Railroad right-of-way, and the provision of improved transit and roadway connections. Building on the recommendations identified in *North Shore 2030*[24]*,* several communities, including Port Richmond (2014)[25] and West Brighton and New Brighton (2016)[26], have worked with the Department of City Planning to envision the future of growth and

[23] Office of the New York State Comptroller, *An Economic Snapshot of Staten Island.* September 2018. https://osc.state.ny.us/osdc/rpt7-2019.pdf. Taxable sales are sales of goods or services that are subject to sales tax. Accessed on June 10, 2019.

[24]NYC Planning. North Shore 2030. https://www.nyc.gov/site/planning/plans/north-shore/north-shore.page Accessed on May 17, 2023.

[25] NYC Planning. Port Richmond Brownfield Opportunity Area https://www1.nyc.gov/site/planning/plans/port-richmond-boa/port-richmond-boa.page Accessed on May 17, 2023.

[26] NYC Planning. West Brighton BOA Nomination Report. May 4, 2016 https://www1.nyc.gov/site/planning/plans/west-brighton-boa/west-brighton-boa.page Accessed on May 17, 2023.

transportation on the North Shore. Collectively, these studies outline a need for enhanced connections, greater mobility, and improved public transportation options to support the anticipated level of economic development.

The existing transportation network is physically constrained and limits mobility for general-purpose and transit vehicles.

The North Shore's roadway network, based on former Native American trails, is influenced by the area's hilly topography and contains few direct east-west through streets. These conditions have resulted in an irregular street grid characterized by circuitous routes, sharp curves, and misaligned intersections. Roadway capacity and maneuverability for buses are constrained by narrow curb-to-curb widths, winding roadway alignments, and on-street parking, which have a severe impact on the reliability of bus routes serving the North Shore. Sharp curves, steep hills, narrow lanes, and a lack of turn lanes reduce travel speeds. Buses picking up or dropping off passengers often block traffic when they are stopped, due to the absence of bus pullout areas or travel lanes for traffic to bypass. The two-lane corridors pose additional challenges near bus stops, as drivers cross into oncoming traffic lanes when clear to pass buses stopped at a bus stop. All these factors combine to impede the efficiency of surface transit operations along the North Shore.

Goals and Objectives

The goals and supporting objectives of the Proposed Project are shown in Table 1. The proposed transportation improvements were developed to improve transit accessibility, reduce travel time, improve reliability, and support Staten Island's growth objectives within a reasonable timeframe. They were also designed to provide benefits to community character and avoid or minimize impacts on the environment.

Table 1 – Goals and Objectives

Goal	Objective
Improve Mobility	» Provide increased and improved travel options along Staten Island's North Shore. » Provide a well-integrated and efficient transit system. » Improve transit access for the transit-dependent and transit-reliant. » Reduce travel time for linked, Manhattan-bound trips. » Reduce crowding on transit services. » Improve transit reliability. » Provide improved transit access to growing activity centers. » Reduce increasing roadway congestion by attracting auto users to transit.
Preserve and Enhance the Environment, Natural Resources and Open Space	» Improve air quality by providing transit alternatives that moderate the increase of vehicle emissions. » Minimize potential adverse impacts on residential areas, businesses, and the built environment from the operation of a transit mode on the North Shore. » Minimize potential adverse impacts on the natural environment from the operation and construction of a transit mode on the North Shore. » Maintain safe and efficient access to land uses along the North Shore.
Maximize Limited Financial Resources for the Greatest Public Benefit	» Make use of existing capacity in transportation corridors, assets, and infrastructure. » Advance the most cost-effective transportation options. » Increase revenue potential, thereby minimizing the level of subsidy required. » Develop transit options that use known and proven technologies suitable for use on the North Shore. » Provide a transportation solution that can be implemented in a timely manner.

3 Proposed Project and Alternatives

Introduction

The identification and evaluation of a range of reasonable alternatives to the Proposed Project, including a No-Action Alternative, is a required component of an EIS under SEQRA. This allows decision-makers to consider whether alternatives exist that would avoid or minimize significant adverse environmental impacts while satisfying the goals of the Proposed Project. The alternatives development and screening process for the Proposed Project, summarized below, was linked to both the Purpose and Need and Goals and Objectives, as described in Chapter 2 of this document.

Alternatives Development Process

In August 2012, MTA published the SINSAA, which assessed the implementation of new or enhanced transit service along the North and West Shores of Staten Island between West Shore Plaza and St. George Terminal.[27] The 2012 SINSAA identified and evaluated eight alternatives representing a mix of modes, routes, alignments and termini with a desired re-use of the former North Shore Railroad right-of-way for transit service. These "Long List Alternatives" included:

- Transportation Systems Management (TSM)
- Heavy Rail along the Staten Island Railway (SIR – St. George to Arlington)

[27] MTA. Staten Island North Shore Alternatives Analysis. 2012.

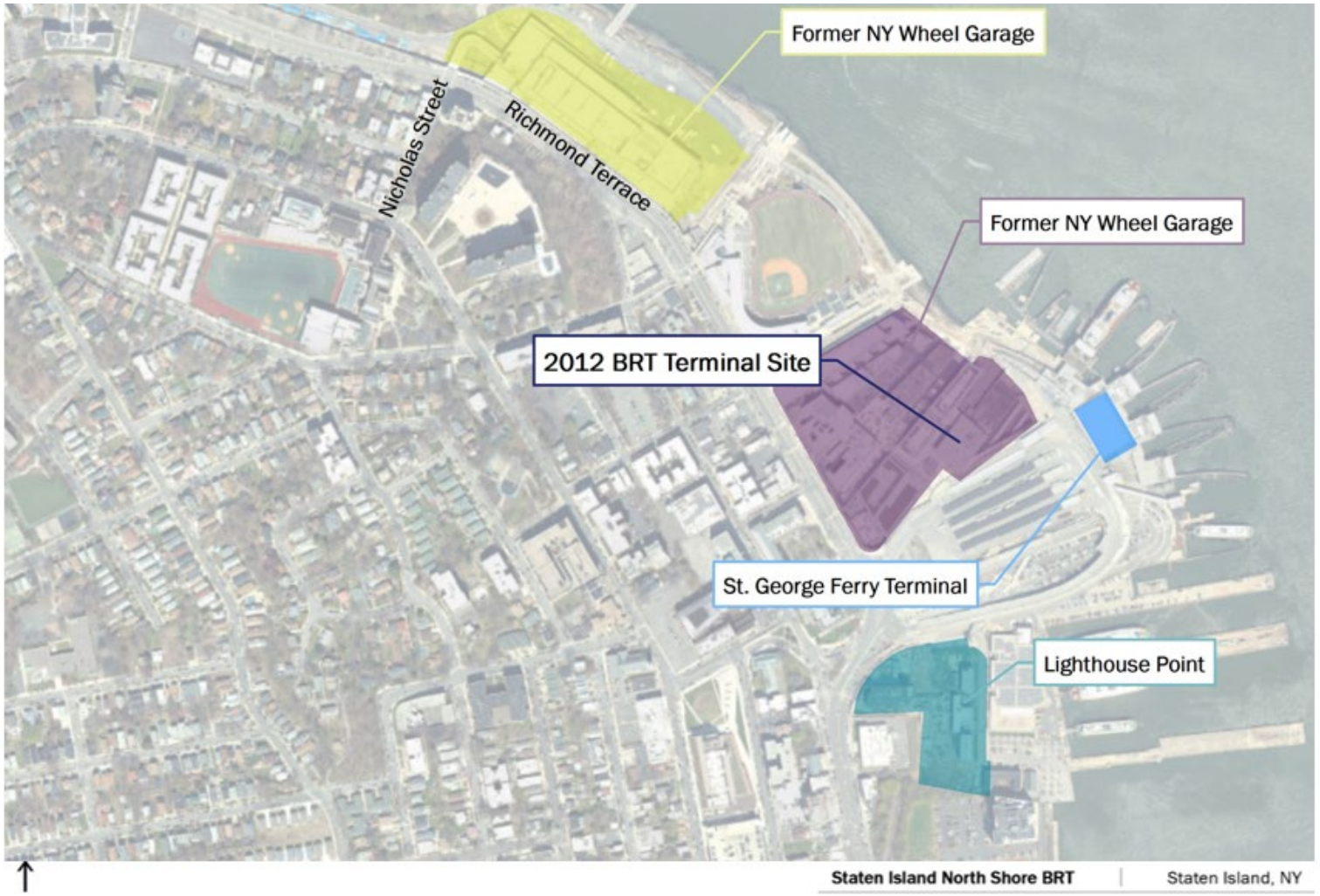
- Electric Light Rail (LRT – St. George to Arlington)
- Diesel Light Rail (DLRT – St. George to Arlington)
- Electric Light Rail (LRT – St. George to West Shore Plaza)
- Diesel Light Rail (DLRT – St. George to West Shore Plaza)
- Bus Rapid Transit (BRT – St. George to West Shore Plaza)
- Ferry/Water Taxi (Kill Van Kull from St. George Terminal to Mariners Harbor)

Three of the eight alternatives were advanced and further developed as part of a "Short List," including **Transportation Systems Management (TSM)**, **Electric Light Rail** (LRT – St. George to West Shore Plaza), and **Bus Rapid Transit** (BRT – St. George to West Shore Plaza) alternatives. The TSM Alternative was not advanced as it was determined to be the least effective in terms of improving mobility and meeting the project goals and objectives. Ultimately, after extensive analysis as well as stakeholder and public outreach, the 2012 SINSAA identified the BRT Alternative as the Preferred Alternative based on its potential to reduce travel time, improve transit access, and attract the most riders with lower capital and operating costs than the LRT Alternative.

Since the publication of the SINSAA in 2012, the portion of St. George near NYCDOT's St. George Terminal has undergone significant changes. The construction of the Empire Outlets and the former New York Wheel parking garage, as well as resiliency-related infrastructure measures, have complicated access between Nicholas Street and St. George Terminal in St. George, precluding the proposed St. George BRT terminal as originally planned (see Figure 4). Given these changes, a Supplement to the 2012 SINSAA (the Supplement) was published in June 2019.[28] The Supplement builds on the substantial work that was previously completed, reassesses the potential accessibility of the SINSAA BRT and LRT alternatives to St. George Terminal, and re-evaluates those alternatives against the Proposed Project's goals and objectives. The common alignment for the BRT and LRT alternatives west of Nicholas Street has not changed since the completion of the 2012 SINSAA, and thus the focus of the updated analyses was in St. George.

[28] Staten Island North Shore Alternatives Analysis Considering St. George Transit Access Options. June 3, 2019 https://new.mta.info/document/9301 Accessed on September 27, 2019.

Figure 4. Recent Development in St George



The Supplement provided information regarding the updated LRT and BRT Alternatives and an evaluation that confirmed their feasibility and ability to serve a terminal station at St. George with a new, dedicated ROW transit facility. Despite a slightly greater travel time and some impacts to Richmond Terrace (i.e., reduced on-street parking), the BRT Alternative still provided greater potential to attract transit riders at a lower cost than the LRT Alternative. Consistent with the 2012 SINSAA, the BRT Alternative remains the higher rated alternative.

The BRT Alternative was presented as the Recommended Alternative at a public meeting held at Snug Harbor on May 8, 2019. Feedback received at this meeting and from the public and local elected officials, along with the analyses presented in the SINSAA and the Supplement, reconfirmed the BRT Alternative as the Preferred Alternative for new transit service on the North Shore.

In addition, the recent changes at St. George created a need to reconceptualize access to and a station at St. George for the BRT project. These concepts and their evaluation will be presented in the EIS.

No-Action Alternative

The No-Action Alternative (or No-Action condition) serves as a baseline, against which the environmental effects of the Build Alternative can be compared. Under the No-Action condition, the Proposed Project would not be implemented, and the former North Shore right-of-way would remain abandoned and unimproved. The No-Action Alternative assumes that existing NYCT bus service would continue to operate on Richmond Terrace and throughout the North Shore on a constrained roadway network. However, without the Proposed Project in place, the ability to add enhanced public transit capacity to meet growing demand would be severely hindered.

The No-Action Alternative incorporates known planned and funded roadway and transit improvements as well as development projects that are likely to be implemented by the project's Build Year of 2035, including development currently under construction or that which can be reasonably anticipated. The agencies to be contacted to obtain this information may include the New York

City Departments of City Planning and Transportation as well as the New York City Economic Development Corporation.

Build Alternative

The Build Alternative, referenced as the Bus Rapid Transit (BRT) Alternative in the 2019 Supplement, would involve the implementation of BRT service between West Shore Plaza and St. George Terminal. The approximately 8-mile proposed alignment would comprise approximately 5.3 miles of ROW from the former North Shore Railroad, and approximately 2.7 miles of City roadways such as Richmond Terrace and South Avenue. The proposed alignment, stations, and service for the project are described below.

Proposed BRT Alignment Location

As noted in the Project Overview, the proposed alignment comprises varying types of ROW segments. The proposed BRT service would operate within a two-lane, dedicated busway with the potential passing lanes at certain stations on the portion of the proposed alignment that uses the former North Shore Railroad right-of-way. The proposed BRT would operate in mixed-traffic (with no exclusive lanes) on the portion of the alignment that uses South Avenue.

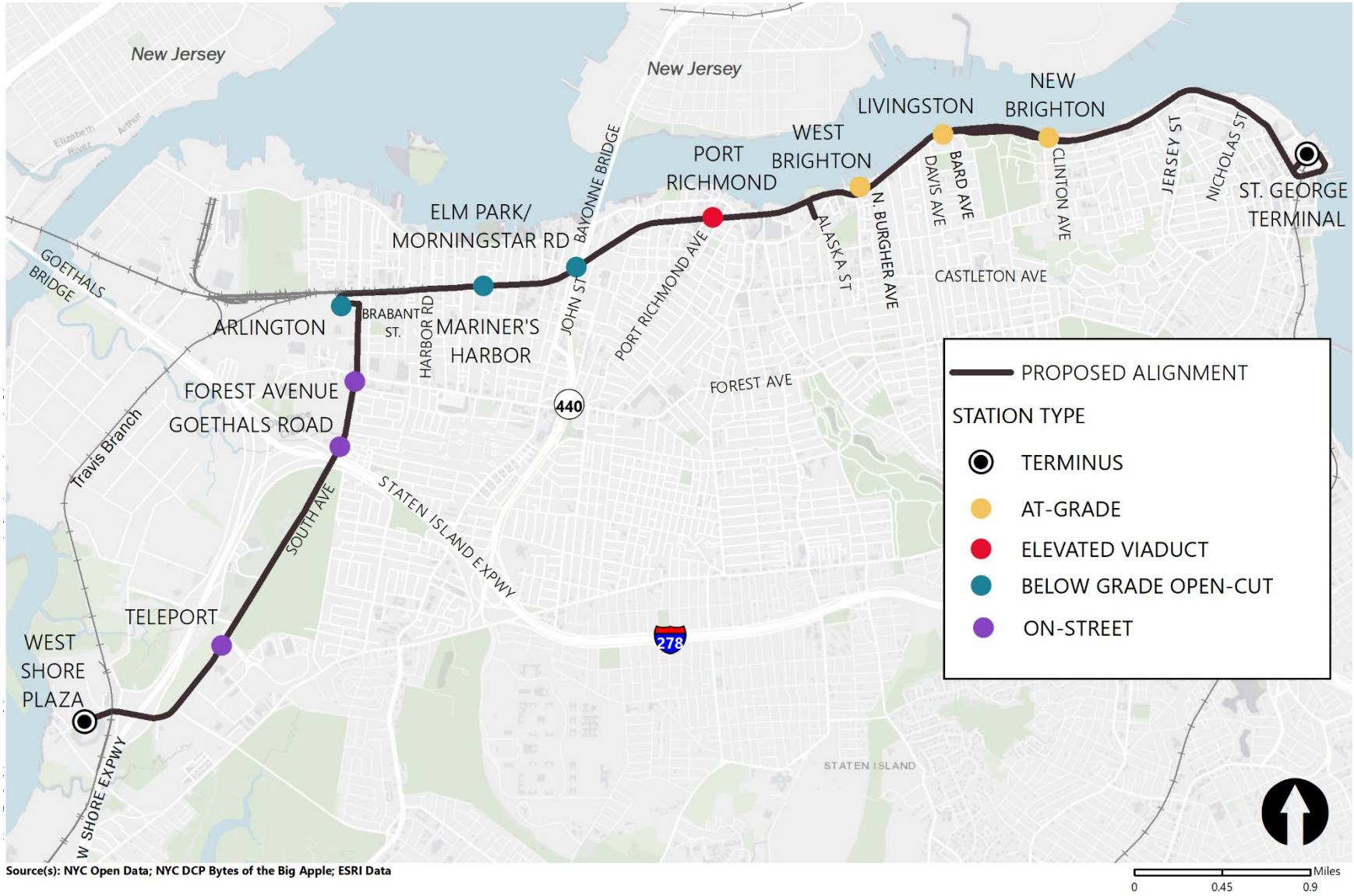
As the BRT service travels west from the existing bus terminal at St. George, the BRT would operate on Richmond Terrace in a new, approximately 0.5-mile exclusive two-lane median busway with a center median and mountable curbs. The exclusive BRT alignment would transition from Richmond Terrace to the former North Shore Railroad ROW at Nicholas Street via a new ramp. The at-grade segment of the former North Shore Railroad ROW generally abuts the waterfront as it travels west. The North Shore's shoreline has been notably altered because of both continuous natural erosion and severe weather events. Additionally, larger vessels passing through the Kill Van Kull as a result of the Bayonne Bridge modification are anticipated to further exacerbate erosion. At present, the right-of-way and bulkhead in the vicinity of Sailors' Snug Harbor has sustained substantial storm damage and has largely been submerged by the Kill Van Kull. A potential conceptual design option under consideration for this area (described further below) may include the shifting the proposed busway away from the shoreline and closer to Richmond Terrace.

At Heritage Park, the at-grade segment of the exclusive BRT alignment would transition to the former North Shore Railroad on a viaduct structure (for approximately 1.2 miles) that extends past the Port Richmond WRRF and Bodine Creek, shifting slightly inland as it crosses through Port Richmond over Richmond Terrace. East of the Bayonne Bridge, near John Street, the viaduct transitions to the ROW's open-cut section that extends west toward the existing freight terminal. The open-cut is approximately 0.9 miles long and is situated roughly 20 to 30 feet below grade with varying widths. In the western section of the cut near Van Name and Union Streets, based on continued coordination with PANYNJ, the BRT would be situated to safely coexist with the existing rail freight service. Near Roxbury Street, the proposed alignment would leave the open-cut and rise to grade below the South Avenue bridge. It would then transition through Arlington where it would join South Avenue at approximately Cable Way where it would operate without exclusive lanes in mixed traffic along South Avenue to West Shore Plaza.

The proposed BRT service would utilize the existing bus depot at the St. George Terminal as its eastern terminus and the existing West Shore Plaza as the western terminus. In between these termini, seven new BRT stations, with amenities such as platforms and shelters, and three, existing, on-street South Avenue stops would be provided (see Figure 5). The specific locations and layouts of the proposed stations will be determined based on their ability to maximize the transportation goals of the project while minimizing environmental impacts, where practicable.

It is anticipated that stations in the open-cut and elevated viaduct sections would be accessed via stairs and ADA-compliant ramps or elevators. Stations along South Avenue, where the bus would operate with traffic in non-separated lanes, would be similar to existing transit stops on Staten Island. Transit Signal Priority (TSP) would be implemented at appropriate intersection locations where feasible. Access to the proposed busway would be provided at four points, located in Arlington, at Bard Avenue, at an extended Alaska Street and at Nicholas Street.

Figure 5. Proposed Station Types and Locations



Additional considerations include the curb-to-curb reconstruction of Richmond Terrace between Nicholas Street and the St. George Terminal to facilitate an exclusive busway and the design treatment of the submerged ROW proximate to Snug Harbor.

The engineering of the project components, identified above, (e.g., station areas, busway, access points, etc.) will be further refined to a conceptual level to support the environmental analysis. The Build Alternative will be fully described in the EIS.

Proposed BRT Service

Figure 6 shows BRT and feeder routes as proposed in the 2012 SINSAA. An operating plan for BRT service will be developed and refined; additional detail will be provided in the EIS by MTA. Currently, it is anticipated that two new BRT routes operating as the S1 and S2 (see Figure 7), as well as extended/rerouted existing bus service (feeder routes), would make use of the proposed BRT alignment, also referred to as a busway. The newly proposed BRT routes are assumed to utilize a fully electric fleet. It is anticipated that existing NYCT bus depots on Staten Island would be utilized for the storage, inspection, and maintenance of the BRT fleet. Specifics regarding these depot locations will be further refined as the service plan is more fully developed and documented in the EIS.

- The S1 would operate in mixed-traffic along South Avenue from the West Shore Plaza commercial center to the new, proposed Arlington Station, where it would enter the busway for the remainder of the trip to St. George. This route would create connectivity between West Shore Plaza, South Avenue communities and the St. George Terminal.
- The S2 would travel between the St. George Terminal and Arlington.
- Headways of local bus routes would be adjusted, and there would be some modification of existing bus routes (e.g., the S40/S90).
- Buses from other locations (specifically the S53, S54, S57, and S59) would enter the busway at access points to provide improved travel times to St. George.

Figure 6. BRT Service & Feeder Routes (2012 SINSAA)

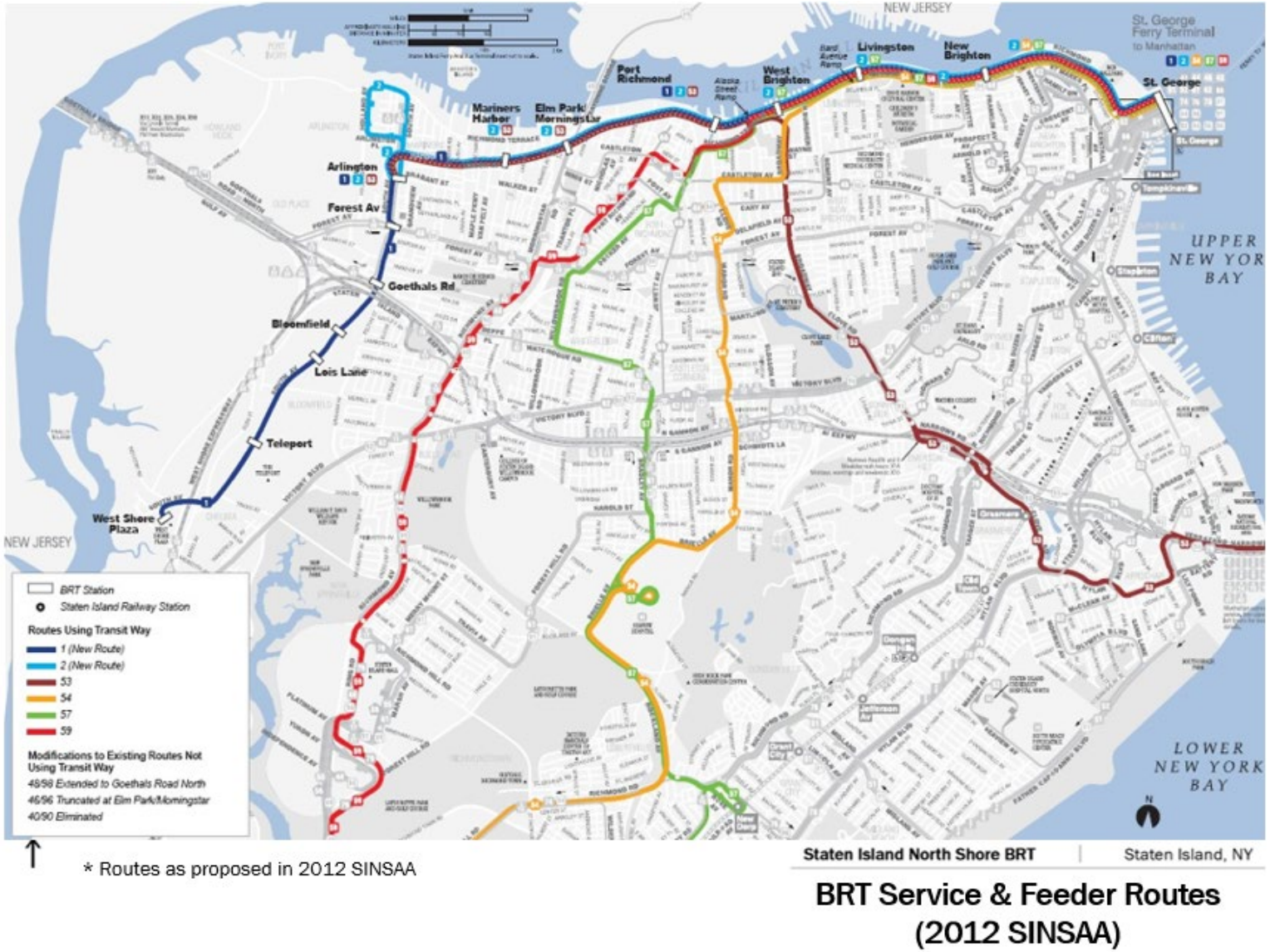
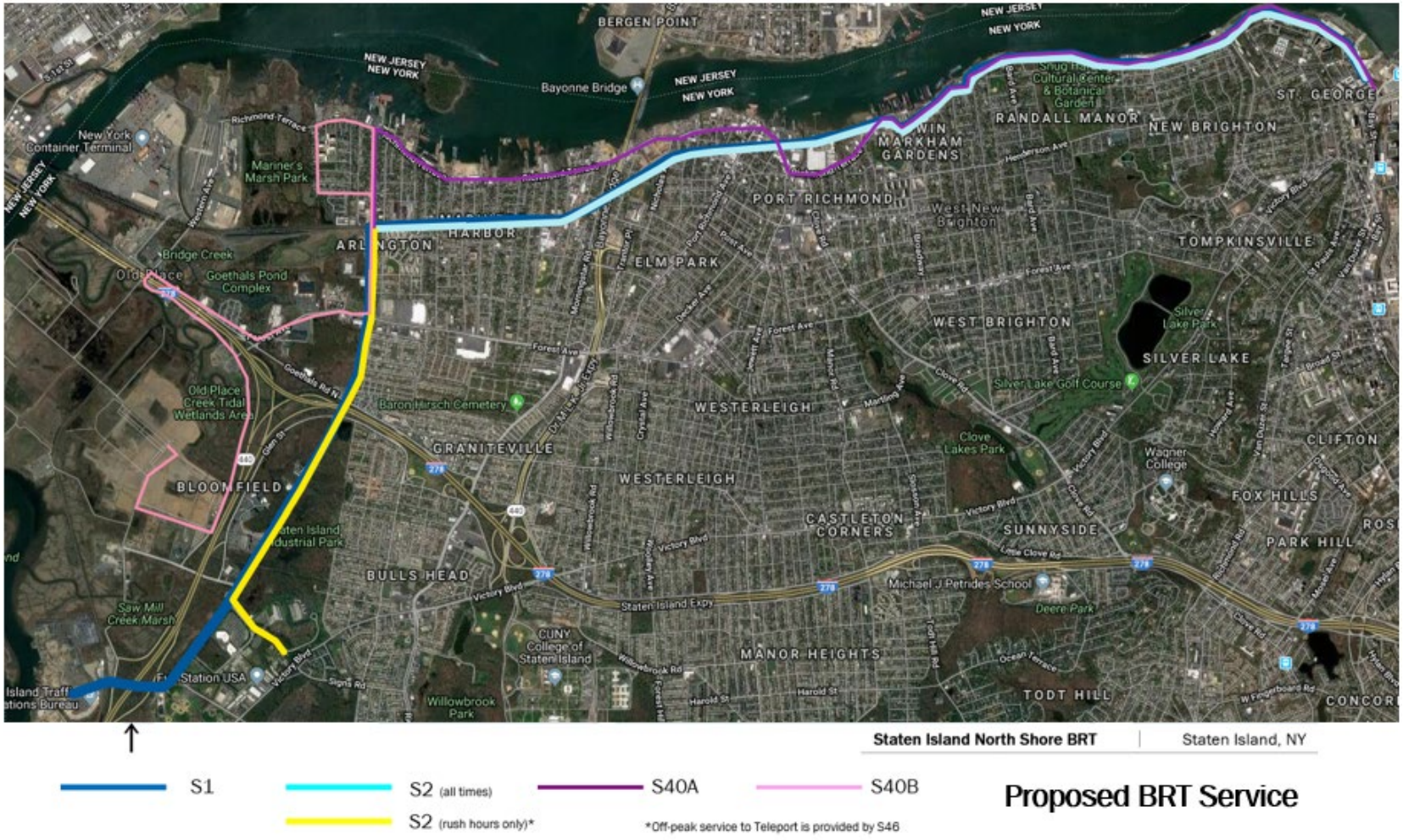


Figure 7. Proposed BRT Service



Project Alignment Along the Waterfront

Near Snug Harbor, the former North Shore Railroad right-of-way is located north of Richmond Terrace. A narrow strip of parkland that is part of Snug Harbor runs between Richmond Terrace and the ROW in this area (see Figure 2: At-Grade Photographs). The former railroad ROW was originally located on dry land to the north of this strip of parkland, but due to decades of severe weather, the shoreline has eroded, and the ROW that was formerly on land is now submerged in the waters of the Kill Van Kull. MTA has identified the potential alignment for this area as an elevated busway. The elevated busway would primarily utilize city-owned right-of-way and would require the conversion of existing parkland from the shoreline portion of Snug Harbor to transportation right-of-way. An elevated BRT busway would be constructed in the acquired area closer to Richmond Terrace.

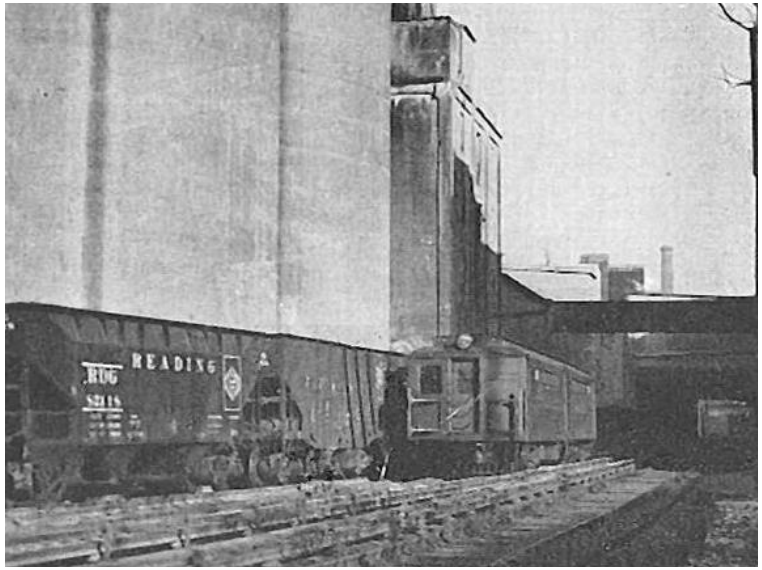
Land Exchanges at Maritime Industrial Properties

The ROW bisects two active water-dependent industrial uses situated along the Kill Van Kull (Caddell Dry Dock and Atlantic Salt). Although these businesses, Caddell Dry Dock and the former U.S. Gypsum Company (now Atlantic Salt), previously operated when the North Shore Railroad was an active railroad through their property, the re-establishment of transit service along the ROW would likely be problematic for the viability of their current operations. Refer to Figure 8 for representative photographs. As such, a shift in alignment to the south will be evaluated to determine if it would enable these property owners to maximize waterfront access for their business functions.

Figure 8. Photographs of Caddell Dry Dock & Atlantic Salt

View of ROW through Caddell Dry Dock & Repair

View of remnant track & ROW through Caddell Dry Dock & Repair



Former passenger rail operating through U.S. Gypsum Plant (now Atlantic Salt)

View of Atlantic Salt, present day

4 Environmental Analysis Framework

Introduction

This chapter of the Final Scoping Document describes the framework to be followed for the environmental analysis. MTA, as lead agency, has determined that the size and scope of the Proposed Project may result in one or more significant adverse environmental impacts and thus require an EIS.

Regulatory Approvals

As described in the Introduction Chapter, MTA, pursuant to SEQRA procedures, will initiate an EIS in conformance with all applicable laws and regulations. This Final Scoping Document was prepared in accordance with those laws and regulations. As noted in Chapter 1, the EIS will be prepared in compliance with CEQR, as required. Potential approvals that may be obtained for the Proposed Project include:

Potential City Approvals

Transfer of Property

» Currently, the ROW is under New York City ownership and is anticipated to be conveyed to MTA-NYCT in ownership or added to the MTA's Master Lease Agreement with the City. The specific transfer mechanism and ownership status of the ROW will be determined at a later date.

Potential Land Use Actions

- Landfills: Uniform Land Use Review Procedure (ULURP) application to facilitate constructing fill at the Snug Harbor waterfront portion of the proposed alignment.
- Change in the City Map: ULURP application to facilitate a change in the City map may be required at several locations including: Roxbury Street, Richmond Terrace, parkland at Snug Harbor, and parkland near the intersection of Jersey Street and Richmond Terrace.
- Cross Access Connections: Non-ULURP application from the New York City Department of City Planning for cross access for the potential station surface parking facilities located at Arlington Station and Livingston Station.
- Acquisitions and Dispositions: ULURP application(s) to acquire private properties and dispose of city-owned properties to facilitate the proposed alignment.

After extensive coordination with various City entities, MTA and the City have agreed that potential ULURP and other City actions will occur subsequent to and separately from the SEQRA process. Based on these ongoing discussions, the required City actions may change as design of the Proposed Project is finalized and will be revisited as the project advances.

Other Potential Approvals

- US Army Corps of Engineers, Clean Water Act Section 404/Section 10 permit(s)
- US Coast Guard, Rivers and Harbors Act Section 9 permit
- New York State legislation authorizing the alienation of mapped parkland
- New York State Historic Preservation Office and New York City Landmarks Preservation Commission, State Historic Preservation Act of 1980 (SHPA), Section 14.09 of the Parks, Recreation and Historic Preservation Law (PRHPL).
- New York State Department of Environmental Conservation, State Pollutant Discharge Elimination System (SPDES) Permit; tidal and freshwater wetlands permits

Study Area

A study area is the area that may be directly or indirectly affected by a project. The primary study area for the Proposed Project includes the project site (alignment) and a 400-foot wide buffer around each side of the

approximately 8-mile proposed alignment. The study area will vary if appropriate according to the resource under consideration and the scope of potential impacts. If a specific resource study area differs from the primary study area, then it will be clearly defined in the methodology.

Analysis Year

The future build analysis of the Proposed Action will be performed for 2035 (Build Year), the expected year of completion of the Proposed Project. This analysis year was selected because 2035 is projected to be the first full year of operation. The No-Action condition will serve as the 2035 baseline, or the projected environmental setting where the Proposed Project would not be constructed. It will be used as a basis for evaluating potential impacts of the Proposed Project. In addition to analysis of the two future scenarios, the EIS will describe the existing conditions for each technical area, or resource, to be assessed.

Organization of the Environmental Analysis

As described in greater detail below, the EIS will contain:

- A description of the Proposed Project, the required actions and approvals, and the environmental setting;
- An analysis of the environmental impacts of the Proposed Project;
- An identification of any adverse environmental effects that cannot be avoided if the Proposed Project is implemented;
- A discussion of alternatives to the Proposed Project;
- An identification of irreversible and irretrievable commitments of resources that would be involved if the Proposed Project is built; and
- A description of measures proposed to minimize or fully mitigate any significant adverse environmental impacts.

Methodology

The SEQRA EIS will use the *CEQR Technical Manual*, where applicable, on the methodologies and impact criteria for evaluating the Proposed Project's potential effects on the environmental technical areas to be studied. In disclosing impacts, the EIS will consider the Proposed Project's potential adverse effects on its environmental setting. The *CEQR Technical Manual* will also guide the development of mitigation measures.

As described above, for each technical area in which the potential for significant adverse impacts exists, the impact assessment will include:

- A description of existing conditions;
- A description of the future without the Proposed Project for the year 2035, when it would be completed and operational (No-Action condition); and
- A description of the future with the Proposed Project for the year 2035, when it would be completed and operational (With-Action condition).

Comparing the two future scenarios identifies the project's impacts on its environmental setting.

5 EIS Scope of Work

The EIS will contain the following analyses, which will be conducted utilizing the methodologies described below:

Project Description

The project description introduces the reader to the Proposed Project and provides the project design information from which impacts are assessed. The chapter will contain a detailed description of the Proposed Project, including all information necessary to describe the project and its component parts (e.g. at-grade, elevated viaduct, and below grade open-cut sections); number of parking spaces at parking facilities at the Arlington and Livingston Stations, the background and history of the Proposed Project; a summary of previous investigations and actions, including the process used to evaluate alternatives to the Proposed Project that were considered but not advanced into detailed environmental review; and a statement of purpose and need, and anticipated benefits of the Proposed Project. In addition, this chapter will summarize the concepts for access to St. George that were considered and evaluated, and the St. George Terminal Study will be provided as an appendix to the EIS.

The chapter will identify the permits and approvals required for the Proposed Project, including other discretionary actions and review by responsible state and federal agencies. The role of MTA, the lead agency for SEQRA, will also be described. Any environmental requirements necessary as part of the Proposed Project will also be identified.

Land Use, Zoning, and Public Policy

A land use analysis characterizes the uses and development trends in the area that may be affected by a Proposed Project and determines whether a Proposed Project is compatible with those conditions. Similarly, the analysis considers the project's effect on, the area's zoning and other applicable public policies. Following *CEQR Technical Manual* guidelines, the land use, zoning, and public policy analysis will be conducted within a study area extending approximately 400 feet on each side of the Proposed Project limits. The boundaries were chosen to include those communities and uses that could potentially be affected by the Proposed Project. The proposed alignment was divided into seven sections, each of which comprises generally similar land uses and/or reflects a section of the proposed alignment that is distinct from an engineering standpoint (see Figure 7 on following page):

- **Section 1.** St. George (Richmond Terrace from the St. George Terminal west to Jersey Street)
- **Section 2.** New Brighton Waterfront (Kill Van Kull shoreline in the New Brighton neighborhood from Jersey Street west to Davis Avenue)
- **Section 3.** West Brighton Waterfront (generally parallels the Kill Van Kull shoreline from Davis Avenue to the foot of Alaska Street)
- **Section 4.** Viaduct (existing viaduct section of the right-of-way from Alaska Street west to John Street)
- **Section 5.** Open-Cut Section (follows open-cut section of the former right of way from John Street west to Harbor Road)
- **Section 6.** Arlington Station (follows the former right-of-way along an at-grade section from Harbor Road to South Avenue, where the BRT route would turn south to Cable Way/Netherland Avenue)
- **Section 7.** South Avenue (south of Cable Way/Netherland Street to West Shore Plaza)

Land use maps by section are shown on the following pages (refer to Figures 9 through 15).

Key issues include the compatibility of the Proposed Project with existing patterns of development, including residential neighborhoods, commercial uses, and community facilities; the Proposed Project's consistency with underlying zoning and officially approved or adopted future plans and

programs (e.g., North Shore 2030, PANYNJ's *Port Master Plan 2050*, Brownfield Opportunity Area (BOA) plans, and other planning documents); and the Proposed Project's potential effects on sensitive uses and neighborhood activity patterns. The land use chapter will provide the following:

- A brief development history of the study area, which will include the Proposed Project limits and a distance of approximately 400 feet around this area;
- A description of existing conditions in the study area, including existing land uses and the underlying zoning;
- A description of land use patterns in the study area, including recent development trends;
- Existing zoning and recent zoning actions, if any, in the study area;
- Other public policies that may apply to the study area, including any formal neighborhood or community plans;

Figure 9. Section Overview Map

Figure 10. St. George Land Use

Figure 11. New Brighton Land Use

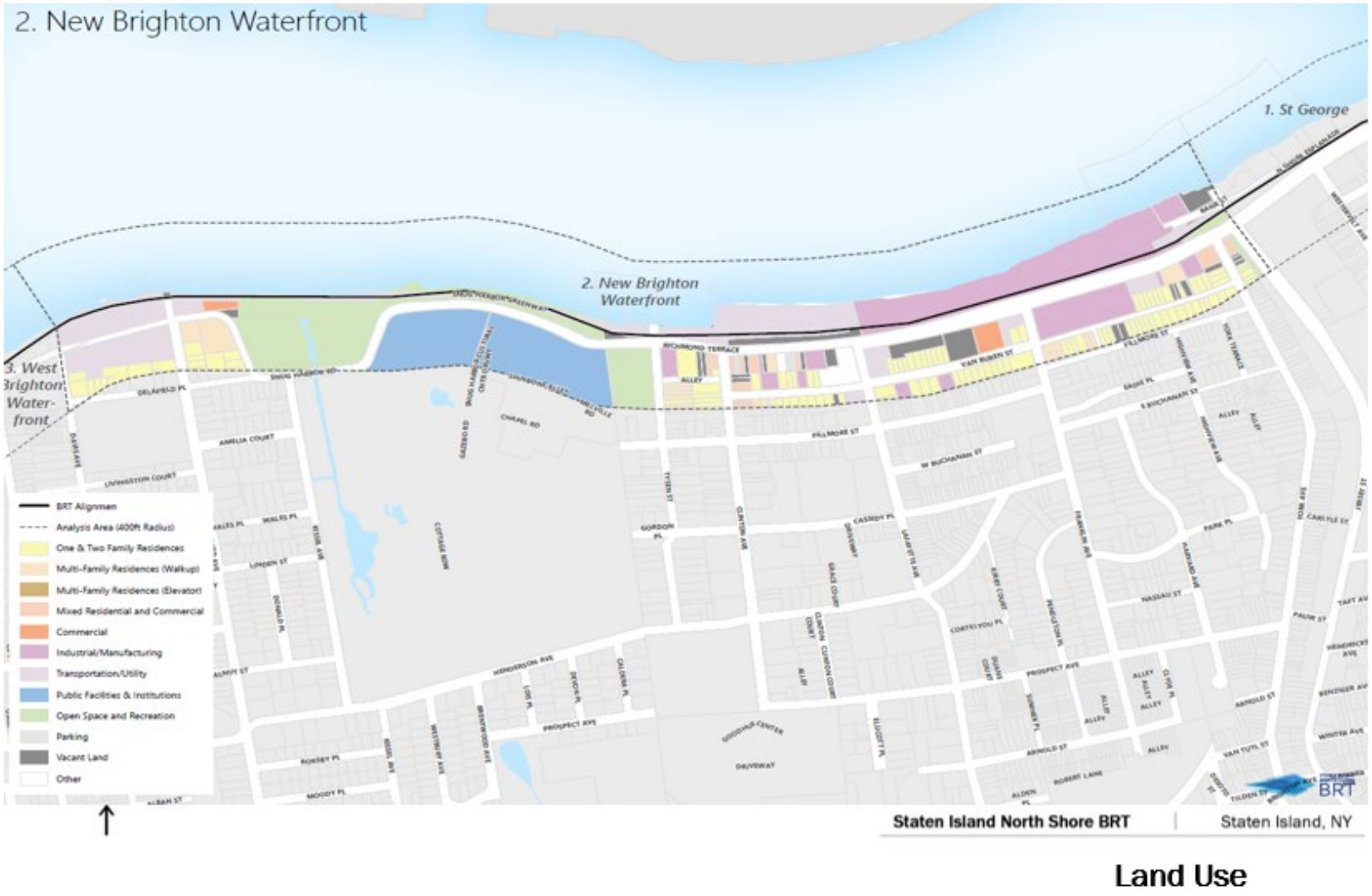


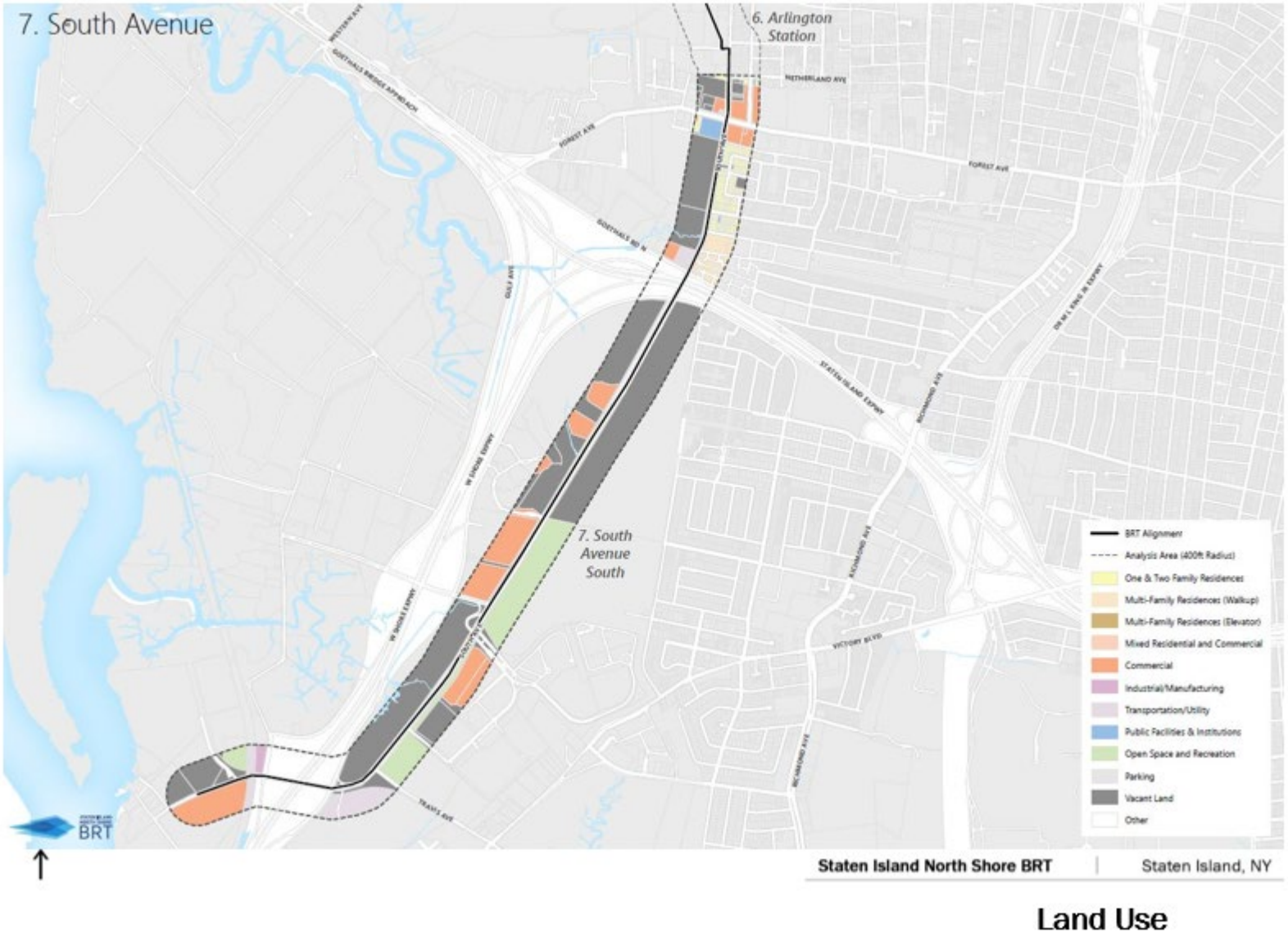
Figure 12. West Brighton Land Use

Figure 13. Viaduct Land Use

Figure 14. Open-Cut Section Land Use

Figure 15. Arlington Station Land Use

Figure 16. South Avenue Land Use



- A discussion of other future projects in the study area that would be completed by the build analysis year, including how these projects would affect land use patterns and development trends;
- Identification of any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study areas, including plans for public improvement; and
- An assessment of the impacts of the Proposed Project on land use and land use trends, zoning, and public policy, including impacts related to issues of compatibility with surrounding land use, consistency with zoning and other public policies, and the effect of the Proposed Project on development trends and conditions in the area.

As shown in Figure 17, the Proposed Project limits are located partially within the New York City Coastal Zone[29]; therefore, an assessment of the Proposed Project's consistency with the New York City Waterfront Revitalization Program (WRP) will also be prepared. NYC Waterfront Revitalization Program Policies specific to mass transit such as Policy 1.3 will be noted in the consistency assessment.[30]

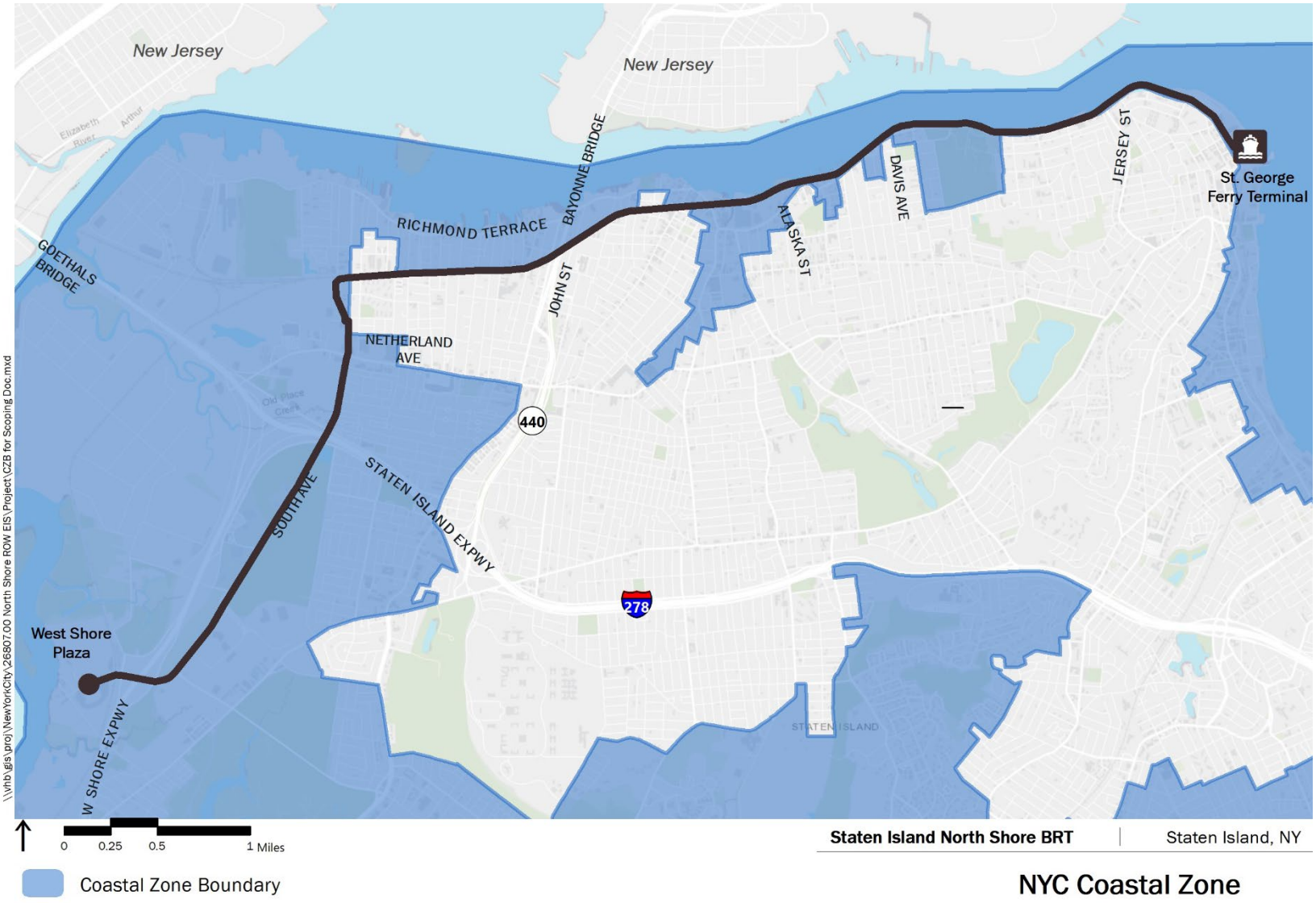
Socioeconomic Conditions

The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes can occur when a project directly or indirectly changes any of these elements. According to the *CEQR Technical Manual*, the six principal issues of concern are whether a project would result in: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement due to increased rents; (5) indirect business displacement due to retail market saturation; and (6) adverse effects on a specific industry.

According to the *CEQR Technical Manual*, which is being utilized for the EIS analysis, direct displacement of less than 500 residents or 100 employees would not typically be expected to substantially alter the socioeconomic

[29]NYC Waterfront Revitalization Program Coastal Zone Boundar Map http://dcp.maps.arcgis.com/apps/View/index.html?appid=90e3a9f927c2471483631a20e8a41d8d Accessed on May 17, 2023.
[30] NYC Planning. The NYC Waterfront Revitalization Program https://www1.nyc.gov/assets/planning/download/pdf/applicants/wrp/wrp-2016/nyc-wrp-partII.pdf#page=2 Accessed on June 10, 2019.

Figure 17. NYC Coastal Zone



character of a neighborhood. The Proposed Project would unlikely exceed any of the thresholds requiring a detailed socioeconomic analysis. To confirm this conclusion, the EIS will include a preliminary screening assessment of the Proposed Project for the above referenced six principal issues of concern, consistent with CEQR. If the preliminary assessment concludes that a detailed assessment is warranted, the analyses will be conducted in accordance with *the CEQR Technical Manual.* The socioeconomic conditions assessment will also consider potential effects from property acquisitions, displacements, or relocations. The assessment will consider whether any property acquisitions and changes in access could have direct or indirect adverse effects on population, housing, and local businesses within the affected areas.

Community Facilities and Services

The community facilities and services assessment will consider potential direct effects and indirect effects on community facilities. The *CEQR Technical Manual* defines community facilities as public or publicly funded schools, libraries, childcare centers, health care facilities, and fire and police protection. A project can affect these facilities and services directly when it physically displaces or alters a community facility or indirectly when it causes a change in population that may affect the services delivered by a community facility, such as by creating a demand that could not be met by the existing facility. The Proposed Project would be unlikely to exceed any of the thresholds requiring a detailed community facilities analysis. To confirm this conclusion, the EIS will include a preliminary screening assessment of the Proposed Project utilizing CEQR.

Open Space

The *CEQR Technical Manual* recommends performing an open space assessment if a project would have a direct or indirect effect on an area open space. The Proposed Project is adjacent, in proximity or may directly impact a number of designated park and open space areas. The potential changes to parklands that may result from the Proposed Project will therefore warrant an assessment of direct effects on area open spaces. The analysis will assess, as appropriate, any potential displacement of open space and recreational resources and potential increases in noise, air pollutants, or shadows from the Proposed Project. The Proposed Project

would not increase the residential or employee population in the study area. As such, according to the *CEQR Technical Manual,* the Proposed Project would not have an indirect effect on open space. The potential need for parkland alienation will also be evaluated.

Shadows

The *CEQR Technical Manual* recommends a shadows assessment for Proposed Projects that would result in new structures (or additions to existing structures) greater than 50 feet in height or located adjacent to, or across the street from, a sunlight-sensitive resource. Such resources include publicly accessible open spaces, sunlight-sensitive natural features, or historic resources with sun-sensitive features. If warranted (i.e., if new or modified elevated BRT structures would exceed 50 feet in height and have the potential to create new shadows on adjacent sensitive resources, particularly adjacent open spaces), a shadows assessment will be provided following the methodology described in the *CEQR Technical Manual*.

Historic and Cultural Resources

The *CEQR Technical Manual* identifies historic and cultural resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic and cultural resources include designated New York City Landmarks (NYCLs) and Historic Districts; properties calendared for consideration as NYCLs by the New York City Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation (NYCL- eligible); properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing (S/NR-eligible), or properties contained within a S/NR listed or eligible district; properties recommended by the New York State Board for listing on the S/NR; National Historic Landmarks (NHLs); and potential historic resources (i.e., properties not identified by one of the programs listed above, but that appear to meet their eligibility requirements). According to the *CEQR Technical Manual*, a historic and cultural resources assessment is recommended if there is the potential to affect either archaeological or architectural resources.

The Proposed Project would pass near several designated historic resources, including Sailors Snug Harbor and various sites in the St. George/New Brighton Historic District. The study area may also be sensitive

for archaeological resources, subject to further consultation with LPC and the State Historic Preservation Office (SHPO). A historic and cultural resources analysis will be prepared utilizing the *CEQR Technical Manual* guidelines, which will include the following:

- Identify and delineate the Proposed Project's study area (the Area of Potential Effects [APE]) for direct and indirect effects in consultation with LPC and SHPO;
- Assess the potential for archaeological resources in the area to be directly affected (the Proposed Project study area) in consultation with LPC and SHPO. If necessary, a Phase 1A Archaeological survey will be prepared, and based on a review by LPC and SHPO, conclusions and recommendations will be summarized. If any additional archaeological investigations are required (e.g., Phase 2 testing and Phase 3 Data Recovery) and completed during the environmental review, the conclusions and recommendations of these investigations will be summarized in the EIS; if work cannot be completed until after environmental review, the commitments to undertake necessary steps with appropriate consultation will be summarized. All archaeological reports and protocols will be submitted to LPC and SHPO for review and comment and all agency comment letters will be included as an appendix;
- Map and briefly describe designated architectural resources within the APE, Proposed Project limits, and a study area approximately 400 feet on each side of the Proposed Project's limits of disturbance;
- Consistent with the *CEQR Technical Manual*, conduct a field survey of the study area to identify any potential architectural resources that could be affected by the Proposed Project. The field survey will be supplemented with research at relevant repositories, online sources, and current sources prepared by LPC and SHPO;
- Seek determinations of eligibility from LPC and SHPO for any potential architectural resources. Map and describe any architectural resources identified through this process;
- Assess the potential for the Proposed Project to have direct, physical impacts on architectural and archaeological resources. Assess the Proposed Project's potential to result in any visual and contextual impacts on architectural resources. The analysis will include a description of the consultation undertaken with LPC and SHPO; and
- Identify any measures that would be necessary to mitigate and/or reduce any potential adverse impacts on historic or cultural resources, in consultation with LPC and SHPO.

Note that, while the analysis described above is generally consistent with the requirements of Section 106 of the National Historic Preservation Act (NHPA), additional coordination with LPC and SHPO will be required should the Proposed Project advance through NEPA.

Urban Design and Visual Resources

According to the *CEQR Technical Manual*, a visual resource is the connection from the public realm to important natural or built features, including views of the waterfront, public parks, landmark structures or districts, otherwise distinct buildings or groups of buildings, or natural resources. If a project would result in physical changes that could be observed by a pedestrian from street level and could potentially change or restrict views of those visual resources, a preliminary assessment of urban design and visual resources should be prepared. While the Proposed Project is not expected to affect urban design in the study area, the EIS will include a detailed analysis of its potential visual impacts on visual resources, specifically in areas where the viaduct and at-grade sections of the proposed alignment may result in changed views at street level. The analysis will include photographs of existing conditions from key viewpoints and renderings of the "with-project" condition for comparison.

Natural Resources

An assessment of natural resources is conducted when a natural resource is present on or near a development site and the project may involve the direct or indirect disturbance of that resource. The *CEQR Technical Manual* defines natural resources as water resources, including surface water bodies and groundwater; wetlands, including freshwater and tidal wetlands; terrestrial resources, such as grasslands and thickets; shoreline resources, such as beaches, dunes, and bluffs; gardens and other ornamental landscaping; and natural resources that may be associated with built resources, such as old piers and other waterfront structures. Because the at-grade portion of the Proposed Project would run adjacent or close to the Kill Van Kull and would pass through several mapped wetland areas, a detailed assessment of the project's potential impacts on wetlands, species and habitat, surface water/floodplains, and coastal erosion will be required. The conceptual engineering effort associated with the Proposed Project is focused on impact

avoidance, minimization and mitigation, where applicable. To that end, based on the results of a corridor-wide wetlands delineation, the layout of the proposed Arlington Station has been modified to avoid impacts to wetlands and their New York State Department of Environmental Conservation (NYSDEC)-regulated adjacent areas. The work will be done in consultation with responsible agencies, including NYSDEC, the U.S. Army Corps of Engineers (USACE), and the U.S. Fish and Wildlife Service (USFWS). Investigations to be completed will include:

- Wetlands and buffers within approximately 150 feet on either side of the Proposed Project's limits of disturbance will be delineated and mapped, and a functional assessment of the mapped wetlands will be completed. The direct impacts (wetland loss through filling or dredging) and indirect impacts (changes in hydrology, water quality, and similar long-term effects) will be evaluated, and appropriate avoidance, minimization, and mitigation measures will be identified in consultation with the agencies with jurisdiction. Coordination will be conducted with NYSDEC and USACE to concur on jurisdictional determinations for study area wetlands.
- A field investigation will be conducted to determine existing terrestrial and aquatic ecological characteristics in the existing and proposed right-of-way. The nature, extent, and significance of potential impacts, including impacts during construction, of the Proposed Project on fish and wildlife habitat will be evaluated. Determinations of the amount and type of vegetation to be disturbed, special habitats that might be damaged, and possible interruption of fish and wildlife movements will be included. Appropriate avoidance, minimization of harm, and mitigation measures to compensate for Proposed Project impacts will also be determined. Coordination will be conducted with USFWS and NYSDEC regarding the potential for impact on federal and state threatened and endangered species.
- In addition to being adjacent to the Kill Van Kull, portions of the proposed alignment would cross streams that discharge into the Kill Van Kull. The proposed alignment also lies partially within the coastal zone and the mapped 100-year Federal Emergency Management Agency (FEMA) floodplain. The EIS will evaluate the effects of construction and operation of the Proposed Project on surface waters, including changes in runoff volume and quality, effects on hydrology of study area streams, and potential impacts on coastal and upstream flooding. Mitigation measures are expected to include best management practices (BMPs) to control erosion and sedimentation from runoff and provide water quality treatment to remove pollutants before runoff is discharged into surface waters. Coordination will occur with FEMA and NYSDEC as appropriate.

The EIS will evaluate the potential impact on the groundwater system of the study area. This includes short-term construction impacts, long-term Proposed Project impacts, and the development of appropriate avoidance and mitigation measures. In addition, a Natural Resources Technical Report will be included as an Appendix to the EIS.

Hazardous Materials

Baseline conditions concerning the potential for contamination in areas that could be disturbed by the Proposed Project will be identified. A corridor-level Environmental Site Assessment (Corridor Assessment) will be prepared for these areas to identify the presence of known hazardous waste or contamination and the presence of environmental problems due to past or current land uses. The Corridor Assessment will encompass the seven right-of-way sections previously described.

Preparation of the Corridor Assessment includes the following tasks:

- Conduct a reconnaissance of the properties within the Proposed Project footprint and surrounding area to identify potential sources or indications of hazardous substances and petroleum products, including aboveground storage tanks (ASTs); evidence of underground storage tanks (USTs); transformers and other items that could contain polychlorinated biphenyls (PCBs); waste storage areas; hazardous materials usage, storage, and disposal; stained surfaces and soils; stressed vegetation; leaks; and odours.
- Review Federal, State, and local regulatory agency records for information regarding documented and/or suspected releases of regulated hazardous substances and/or petroleum products on or near the properties.
- Review historic sources (e.g., fire insurance maps [Sanborn Maps], aerial photographs, topographic maps, as applicable) to develop a history of the previous uses of the property and surrounding area.
- Review physical setting sources for information about the geologic, hydrogeologic, hydrologic, and topographic characteristics of the property.
- Interview past and present owners and occupants, as appropriate.

The assessment will evaluate the extent and nature of contamination of sites that would potentially be impacted by construction of each right-of-way section. For each site identified, a value ranking for potential site

contamination will be provided. The sites with potential contamination will be ranked in the following categories: (a) sites where contamination may exist, but have little or no potential to affect the construction or operation of the Proposed Project; and, (b) sites where contamination may exist **and** have the potential to affect the construction or operation of the Proposed Project.

Through the of review of regulatory records, historical sources, physical setting sources, and Site reconnaissance observations, the value ranking system will evaluate sites based on the following:

- Documented historical industrial or manufacturing uses, hazardous waste storage and generation, and/or petroleum/chemical storage that has the potential to affect the construction or operation of the Proposed Project;
- State Superfund Sites, State Hazardous Waste Sites, Brownfield Cleanup Sites, Voluntary Cleanup Sites, and/or Manufactured Gas Plant sites that are active, have not undergone remediation to the satisfaction of the governing regulatory agency, and have the potential to affect the construction or operation of the Proposed Project;
- Open NYSDEC spill cases with documented soil and/or groundwater impacts that may be present and have the potential to affect the construction or operation of the Proposed Project.
- Properties identified with hazardous materials storage and/or generation with open violations associated with on-site mismanagement and/or improper disposal activities that have the potential to affect the construction or operation of the Proposed Project; and,
- Surrounding properties that are identified as potential sources or indications of hazardous substances and/or petroleum products based on observed spills/releases associated with ASTs and waste storage areas; stained surfaces and soils, stressed vegetation, leaks, and odours; and evidence of unregulated USTs that have the potential to affect the construction or operation of the Proposed Project.

Sites requiring further analysis will be identified and the requirements for potential future testing and remediation will be described. The performance of future testing and remediation, if warranted, will be performed in accordance with the *CEQR Technical Manual* and will apply specifically to media (soil and groundwater) that will be affected by the construction or operation of the Proposed Project (i.e., soil handling as a result of excavation

activities and potential dewatering activities where groundwater is encountered within excavations at the Proposed Project).

Water and Sewer Infrastructure

A water and sewer infrastructure assessment evaluates whether a project may adversely affect the City's water distribution or sewer system. The *CEQR Technical Manual* recommends that a water and sewer infrastructure analysis be performed only on projects that increase density or change drainage conditions on a large site. The Proposed Project would not result in residential or commercial development and is not expected to exceed the thresholds of the *CEQR Technical Manual* requiring a water and sewer infrastructure analysis. The EIS will include a preliminary screening assessment of the Proposed Project's potential to affect any water and sewer infrastructure. Since the Proposed Project would result in an increase in impervious surfaces, the EIS will include an assessment of potential impacts on the stormwater infrastructure system.

Solid Waste and Sanitation Services

A solid waste and sanitation services assessment determines whether a project has the potential to cause a substantial increase in solid waste production that could overburden available waste management capacity or otherwise be inconsistent with New York City's Solid Waste Management Plan (SWMP) or with New York State policy. The *CEQR Technical Manual* recommends a detailed analysis of solid waste impacts for projects that would result in substantial amounts of solid waste (generally 50 tons per week or more). Although a small amount of solid waste would be generated at station areas, the Proposed Project would not result in substantial amounts of solid waste. The EIS will include a preliminary screening assessment of the Proposed Project's potential to affect any solid waste and sanitation services.

Energy

The CEQR Technical Manual recommends a detailed analysis of energy impacts for projects that could substantially affect the transmission or generation of energy or cause substantial new consumption of utility energy (e.g., electricity, natural gas, or steam). The Proposed Project would not substantially affect the transmission or generation of energy and would not

result in new development that requires utility energy services; therefore, the Proposed Project is not expected to result in substantially increased energy consumption. The EIS will include a preliminary screening assessment of the Proposed Project's potential effects on utility energy. In addition, the Proposed Project's direct and indirect energy consumption during construction (i.e., energy required to produce and transport construction materials) will be disclosed as part of the Greenhouse Gas Emissions and Climate Change analysis, described below.

Transportation

The Proposed Project is a transportation improvement project that is intended to improve transit accessibility, reduce travel time, improve reliability, and support Staten Island's growth objectives. The transportation assessment will evaluate both beneficial and adverse impacts as a result of the Proposed Project. The *CEQR Technical Manual* prescribes technical analyses to determine potential project impacts on "key technical areas of the transportation system." These areas include traffic, transit, pedestrians, and parking. Separate assessments of project impacts on each individual technical area are used to determine whether a project may adversely affect a specific area of the transportation system.

Traffic

The examination of traffic effects will include evaluation of vehicular access and circulation. It will also assess existing conditions and potential impacts of the Proposed Project on study intersections and corridors. This detailed analysis will include the following tasks:

» **Identification of Study Area**. The study area includes intersections along Richmond Terrace, Castleton Avenue, Forest Avenue, and South Avenue. A total of 25 signalized and stop-controlled intersections will be analyzed. The selected intersections include those that may be affected by construction and operation of the Proposed Project. The intersections selected for analysis fall into three categories. The first category includes intersections where the proposed alignment passes directly through. The second includes intersections where there are access points to the proposed alignment. The third includes critical intersections which would see an increase in bus traffic or would otherwise be affected by the project. The following lists the 25 intersections that will be analyzed.

- Ferry Terminal Viaduct/Richmond Terrace/Bay Street

- Ferry Terminal Viaduct/Richmond Terrace
- Richmond Terrace/Schuyler Street
- Richmond Terrace/Wall Street
- Richmond Terrace/Hamilton Avenue
- Richmond Terrace/Stuyvesant Place
- Richmond Terrace/Nicholas Street
- Richmond Terrace/St Peters Place
- Richmond Terrace/Westervelt Avenue
- Richmond Terrace/Jersey Street
- Richmond Terrace/Franklin Avenue
- Richmond Terrace/Lafayette Avenue
- Richmond Terrace/Bard Avenue
- Richmond Terrace/Broadway
- Richmond Terrace/Alaska Street
- Jewett Ave/Richmond Terrace
- Richmond Terrace/Heberton Avenue
- South Ave/Brabant Street
- South Ave & Cable Way
- South Ave/Forest Avenue
- South Ave/Goethals Road North
- South Ave/Fahy Ave/Glen Street
- South Ave/Ed Curry Avenue
- South Ave/Teleport Drive
- South Ave/Travis Avenue

» **Traffic Data Collection.** Traffic data collection will include manual and automated traffic counts. These data will be summarized and used to develop a large-scale, detailed traffic model. The model will support ongoing traffic analysis throughout the Proposed Project. If air quality and/or noise analyses show that the Proposed Project may cause substantial adverse impacts, additional targeted traffic data collection may be undertaken to validate these conclusions, in accordance with the *CEQR Technical Manual* guidelines that MTA-NYCT has opted to use for these analyses.

- **Modeling Approach.** The 25 study area intersections will be analyzed under Existing conditions, two Future No-Action analysis years, and two Future With-Action analysis years. All 25 intersections will be analyzed using Synchro Version 9 for delay by movement, in accordance with CEQR guidance. The resulting traffic delay will be used to support air quality and noise analyses. Up to 8 of the 25 study area intersections will be analyzed in a microsimulation model using Vissim Version 11.00. This analysis tool will be used to evaluate critical locations along the BRT corridor that involve intersections with Transit Signal Priority (TSP), complex geometry, bottlenecks, crossings with heavy pedestrian demands, or locations where vehicles in the transit-only proposed alignment and general traffic interact.
- **Existing Conditions Analysis.** Traffic analysis for all 25 intersections will be performed for the weekday AM and PM peak hours, and traffic analysis for up to eight intersections will be performed for a Saturday peak hour determined based on the results of weekday and weekend traffic counts that comply with CEQR guidance. These peak analysis hours are as follows:
    - Weekday AM (7:30 AM – 8:30 AM)
    - Weekday PM (5:00 PM – 6:00 PM)
    - Saturday Peak (1:00 PM – 2:00 PM)

  The peak traffic hours were determined based on Turning Movement Counts (TMCs).
- **Future No-Action Condition Analysis.** The Proposed Project's anticipated build year, or Estimated Time of Completion (ETC), is 2035. Traffic analysis for the No-Action condition will include estimation of volumes and levels of service during the peak analysis hours for the 2035 ETC year.

Current daily peak hour traffic will be used as a baseline to obtain inputs for the ETC year. Appropriate annual background growth rates will be determined through use of the *CEQR Technical Manual* guidelines based on historical and current traffic counts. Trip generation assessments for programmed and potential development activities within the study area will also be conducted. This analysis will include consideration of "soft sites," where no development proposals currently exist, but where development may reasonably be expected to occur by the projected build year, based on current zoning regulations. Finally, the analysis will consider any programmed changes to roadway geometry, direction, or infrastructure that would affect traffic volumes and roadway capacity and levels of service.

» **Future With-Action Condition Analysis.** Similar analyses will be undertaken to determine the effects of With-Action conditions when the Proposed Project is built and fully operational. These analyses will cover the 2035 ETC year. As appropriate, an auto-turn analysis will be performed for any proposed modifications to roadway geometry. The traffic models described above will be used to quantify changes in local and regional traffic patterns that would result from changes to transit and general-purpose traffic with the Proposed Project. Future anticipated growth rates and other metrics for the No-Action and With-Action conditions will be compared to determine whether the Proposed Project will have a substantial impact on traffic within the study area.

Bus Service

The Proposed Project is designed to provide a direct and substantial benefit to bus service on the North Shore of Staten Island. The proposed BRT routes will be described in terms of anticipated ridership, levels of service, and coordination with existing routes. Ridership forecasts were developed by the MTA assuming full operation for the analysis year of 2035. Anticipated ridership, and the mode and travel to/from the station will be detailed in the EIS. The impacts of the new service on existing routes, including any modifications necessary, and planned bus transit routes, including the potential effects of BRT service on load levels of connecting routes, will be quantified.

Pedestrian Facilities

A pedestrian analysis will be undertaken at up to 40 elements such as crosswalks, sidewalks, and corner reservoirs throughout the study area where additional pedestrian traffic is anticipated or where pedestrian patterns might be significantly affected. For example, sidewalks in the vicinity of proposed stations, where platforms and shelters are proposed, will be analyzed to ensure appropriate sidewalk width is maintained. The analysis will be performed for the weekday AM and PM peak hours. In addition, a qualitative assessment will account for existing bicycle lanes. Using this information, appropriate provisions will be made when recommending improvements and modifications to intersection configurations.

Pedestrian, Bicycle, and Vehicular Safety Assessment

Recent study area crash data will be obtained from NYCDOT to examine vehicular and pedestrian safety issues near proposed BRT stops. These data

will be reviewed to identify high vehicle or high pedestrian/bike crash locations, utilizing CEQR criteria to determine if detailed analyses are warranted. Design scenarios will be reviewed to identify potential changes that could avoid adverse impacts to pedestrian or vehicle safety. Feasible improvement measures will be developed to mitigate potential safety issues identified during this review.

Parking Conditions

The parking analysis will focus primarily on an assessment of curbside parking spaces displaced along the proposed alignment. This displacement may include on-street parking spaces used by autos as well as spaces used for truck loading/unloading and service vehicles. Based on parking surveys conducted, the evaluation will include a detailed inventory of on-street parking and public off-street facilities for weekday AM, midday, and PM periods to assess available capacity. This assessment will also include any additional parking demand induced by the Proposed Action.

In addition, the Proposed Project may include station surface parking facilities located at Arlington Station and Livingston Station. As described earlier, the Project Description Chapter of the EIS will describe the number parking spaces at the surface parking facilities at the Arlington and Livingston Stations,

The parking study area will be at locations where the proposed North Shore ROW changes the number of on-street and off-street parking spaces. This baseline parking inventory will be updated to reflect the two future No-Action conditions with new developments in the corridor through the Build Year and the Future Analysis Year. Under With-Action conditions, the displacement effects on parking will be quantified by neighborhood as well as for the corridor as a whole. Measures to ameliorate parking shortfalls will be developed as needed.

Freight Rail

The effects on existing and future planned freight rail due to the Proposed Project during construction and post implementation will be identified, and potential impacts would be addressed based on FTA standards (e.g., use of impact attenuators at the end of the line, etc.).

Air Quality

The *CEQR Technical Manual* will be utilized to study air quality impacts for this project. Air quality analyses are provided in an EIS in order to determine whether project-related pollutant emissions would result in a stationary or mobile source adverse impact on ambient air quality. The Proposed Project would not include any new permanent stationary emission sources such as building heating, ventilating, and air conditioning (HVAC) equipment; therefore, a stationary source analysis is not warranted.

The Proposed Project would create dedicated lanes for BRT transit service, thus adding to overall roadway capacity. Although the BRT buses would be all-electric and would therefore not emit air pollutants, the dedicated lanes would free up capacity for general-purpose vehicles on Richmond Terrace and other nearby roadways. In addition, the Proposed Project may alter traffic patterns on surrounding local streets (e.g., by changing transit local routes to serve as "feeders" to the BRT route). Therefore, a mobile source air quality analysis is warranted and will be conducted.

The U.S. Environmental Protection Agency (USEPA) has set National Ambient Air Quality Standards (NAAQS) for six air pollutants of concern to air quality (carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide). In addition to the NAAQS, emissions of other pollutants from vehicles (known as mobile source air toxics, or MSATs) are also often considered for large transportation projects. The air quality analysis for the EIS will identify whether implementation of the Proposed Project would result in any exceedances of NAAQS or any substantial increases or decreases in air pollutant emissions.

The air quality analysis will include a mesoscale (regional) and a microscale (local, or "hot-spot") analysis. The mesoscale analysis will estimate the net change in emissions associated with the Proposed Project, stemming from the projected changes in speed, vehicle miles traveled (VMT), and roadway type and configuration. The microscale analysis will be conducted to assess future carbon monoxide (CO) and particulate matter ($PM_{2.5}$) levels at intersections and parking areas where the greatest increase in traffic is projected and where sensitive uses, such as residences, are closest.

The air quality analysis in the EIS will be undertaken in accordance with all Federal and State requirements. It will consist of the following steps:

- Establish the study area. For the mesoscale analysis, the study area will conform to the transportation (traffic) study area. The study area for the microscale analysis will include up to three worst-case intersections, including two (2) intersections for CO analysis and one (1) intersection for $PM_{2.5}$ analysis;
- Identify the NAAQS and discuss the study area's attainment status;
- Describe existing pollutant concentrations based on data from NYSDEC air monitoring stations;
- Using the USEPA MOVES (Motor Vehicle Emission Simulator) model, estimate criteria pollutant and MSAT emissions with the Proposed Project, within the mesoscale study area, for ETC and ETC +10 No-Action and With-Action conditions;
- Perform a CO and $PM_{2.5}$ screening to determine where a detailed air quality analysis would be required. For locations where a detailed analysis is required, CO and/or $PM_{2.5}$ levels will be modeled using the MOVES model to calculate emissions and the CAL3QHC model to assess the dispersion of the pollutants. CAL3QHC is a model accepted by USEPA for assessing air quality impacts resulting from the operation of roadways. The critical analysis year (i.e., the year when the potential for the greatest impact is likely) will be modeled;
- Determine whether the Proposed Project would result in exceedances of the NAAQS; and
- If adverse impacts on air quality are identified, develop mitigation measures, as appropriate.

Greenhouse Gas Emissions and Climate Change

In accordance with the *CEQR Technical Manual*, a greenhouse gas (GHG) emissions analysis discloses GHG emissions that could result from a large-scale project, and assesses the consistency of a Proposed Project with the City's goals to reduce GHG emissions. Therefore, this chapter of the EIS will disclose GHG emissions associated with the Proposed Project and assess the consistency of the Proposed Project with the City's established GHG reduction goal. Emissions will be estimated based on the change in vehicle speeds and miles traveled due to the Proposed Project. Direct energy consumption and GHG emissions associated with vehicle operations will be estimated using the MOVES model, based on forecasts of vehicle miles traveled. Direct and

indirect energy consumption during construction (i.e., energy required to produce and transport construction materials) will be discussed qualitatively. Features of the Proposed Project that demonstrate consistency with the City's GHG reduction goal will be described.

Because the study area is located in a flood hazard zone, the potential impacts of climate change on the Proposed Project will also be evaluated. The discussion will focus on sea level rise and changes in storm frequency projected to result from global climate change and the potential future impact of those changes on the Proposed Project's infrastructure. Design measures to increase infrastructure resiliency will also be discussed.

Noise

The Proposed Project will add new BRT operations to the study area along at-grade, elevated viaduct, and below grade open-cut sections and may alter traffic patterns on surrounding local streets. These changes in vehicle and bus noise have the potential to cause adverse impact to noise receptors, such as residences, health care facilities, schools, and parks/open space. If significant adverse impacts are identified, measures will be identified to mitigate or avoid those impacts to the greatest extent practicable. The noise impact assessment will be conducted through utilization of the CEQR *Technical Manual* guidelines for compliance with SEQRA and in accordance with the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual* (dated September 2018) for compliance with NEPA.

The following tasks will be performed as part of the noise assessment:

- Noise-sensitive land uses will be identified throughout the study area and categorized according to the CEQR Noise Exposure Guidelines for Use in City Environmental Impact Review (CEQR Table 19-2) and FTA land use categories (FTA Table 4-3). Land use will be identified using the New York City Zoning Tax Lot Database and field observations.
- Ambient noise measurements will be conducted in the study area to characterize the existing conditions. Measurement sites will be selected at representative sites of sensitive uses. A preliminary review of the study area has identified approximately 16 measurement locations throughout the study area including locations near intersections that will be analyzed

as part of the Traffic *Existing Conditions Analysis* and along the proposed alignment.

- At each measurement site, measurements will be conducted for 20-minute periods during weekday morning, mid-day, and evening peak periods. At approximately six sites near intersections that will be analyzed as part of the Traffic *Existing Conditions Analysis*, measurements will also be conducted for 20 minutes during the Saturday afternoon peak period. At approximately 12 of the sites adjacent to the BRT corridor, measurements will be conducted for 1 hour between 7:00 AM and 7:00 PM. for estimating the day-night average sound level (L_{dn}) according to FTA methods (FTA manual Appendix E Option 1 and 4) for determining existing noise conditions.
- Data collected will include overall A-weighted and octave-band equivalent sound levels (L_{eq}), statistical sound level descriptors (L_{max}, L_{min}, L1, L10, L50, and L90). A complete record of the measurements, including the specific measurement location, time of measurements, meteorological conditions, equipment used, and significant noise sources will be documented. A summary table of existing measured noise levels will be provided as part of the EIS.
- Based on the traffic studies (described above under "Transportation"), a noise screening analysis will be conducted to determine whether there are any locations where there is the potential for the Proposed Project to result in adverse noise impacts (i.e., doubling Noise Passenger Car Equivalents [PCEs]) due to project-generated traffic. Following procedures outlined in the *CEQR Technical Manual* for assessing mobile source noise impacts, future No-Action and With-Action noise levels will be estimated at the noise receptor locations based on proportional modeling.
- At any receptor locations where the noise screening analysis indicates the potential for a doubling of traffic or more between the No-Action and With-Action conditions, a detailed traffic noise analysis will be conducted using the Federal Highway Administration's Traffic Noise Model (TNM).
- Noise impact from the Proposed Project including the increase in traffic and BRT operations will be assessed using the methods and criteria described in the *CEQR Technical Manual* and the FTA guidance manual. FTA reference noise emissions for electric buses will be used to predict future noise conditions with the Proposed Project. If there would be significant adverse noise impact due to the Proposed Project, mitigation measures to reduce the potential noise effects will be evaluated.
- Vibration from rubber-tired vehicles generally does not have the potential to cause annoyance within nearby buildings unless travel lanes are particularly close to structures. A screening will be conducted to assess the potential for vibration effects due to the Proposed Project.

Public Health

As indicated in the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated impact is identified in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If unmitigated impacts are identified in any one of these technical areas and the lead agency determines that a public health assessment is warranted, an analysis will be provided for that specific technical area.

Neighborhood Character

Neighborhood character is determined by a number of factors, including land use, socioeconomic conditions, community facilities, open space, historic and cultural resources, urban design, visual resources, shadows, transportation, and noise. According to the *CEQR Technical Manual* guidance, an assessment of neighborhood character is generally needed when a project has the potential to result in adverse impacts in one of the technical areas presented above, or when a project may have moderate effects on several of the elements that define a neighborhood's character. Therefore, if warranted based on an evaluation of the Proposed Project's impacts, an assessment of neighborhood character would be prepared following the methodologies outlined in the *CEQR Technical Manual*. The analysis would begin with a preliminary assessment, which would involve identifying the defining features of the area that contribute to its character. If the preliminary assessment establishes that the Proposed Project would affect a contributing element of neighborhood character, a detailed assessment will be prepared to examine the potential neighborhood character-related effects of the Proposed Project through a comparison of future conditions with and without the Proposed Project.

Construction Impacts

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as on people passing through the area. The Proposed Project, because of its anticipated construction activities and duration, as well as potential changes to vehicular and pedestrian circulation (e.g., lane closures or temporary loss of sidewalks) and its proximity to sensitive receptor locations, such as residences and open space, may have the potential for construction impacts. Therefore, a

construction assessment will be performed for potential construction-related impacts. This assessment will describe the construction schedule and logistics, discuss anticipated on-site activities, and provide estimates of construction workers and truck deliveries for the Proposed Project.

Technical areas to be assessed include the following:

Transportation

This assessment will consider construction vehicle and worker trips during the weekday AM and PM peak construction hours (which typically coincides with the hours when workers arrive on site and workers leave the area) to determine potential transportation-related impacts. The construction analysis would incorporate the effects of temporary lane closures or other capacity losses or diversions.

A detailed traffic analysis for construction conditions will be performed at up to eight intersections that would be most affected during this scenario. Traffic levels during the construction period will be compared to the impact criteria outlined in the *CEQR Technical Manual* to determine the potential for adverse traffic impacts. Where potential impacts are identified, improvements will be explored to mitigate those impacts to the extent practicable. The construction transportation analysis will also identify the number of parking spaces that may be needed during peak construction activities.

Air Quality

Emissions from on-site construction equipment and on-road construction-related vehicles, as well as dust-generating construction activities, have the potential to affect air quality. This assessment will include a qualitative analysis of construction activities to determine the potential for air quality impacts on nearby sensitive receptor locations. If the construction traffic analysis (described previously) identifies that the construction peak hour would generate significantly more vehicles than the project peak hour or if significant air quality impacts are expected under the With-Action condition, more detailed analyses may be necessary. If warranted, a detailed quantitative analysis would be performed to determine the potential for air quality impacts during construction on sensitive receptor locations (i.e., residences and open spaces). The potential for significant impacts will be

determined based on whether the Proposed Project would result in exceedances of the NAAQS. The air quality analysis will also include a discussion of the strategies to reduce project related air pollutant emissions associated with construction activities.

Noise and Vibration

The construction noise impact analysis will include a qualitative evaluation of noise from construction of the Proposed Project. Construction noise methodologies will be based on NYSDEC noise policy and FTA criteria (which is largely consistent with CEQR). This analysis will be conducted for sensitive receptors (i.e., residences, open spaces, churches, schools, etc.) located near proposed construction work areas and potential staging sites. Noise levels due to construction will be predicted at each sensitive receptor based on the types and locations of anticipated construction activities and equipment. If warranted, a more detailed quantitative noise analysis using the FTA methods based on equipment and activity levels likely to be used during construction would be conducted. If necessary, based on the results of the construction noise analysis, the feasibility, practicability, and effectiveness of implementing measures to mitigate any construction noise impacts will be examined.

Construction activities also have the potential to result in vibration levels that may result in structural or architectural damage and/or annoyance or interference with vibration-sensitive activities. A construction vibration assessment will be performed to determine critical distances at which various pieces of equipment may cause building damage or annoyance based on the type of equipment, building construction type, and applicable vibration level criteria. Should it be necessary for certain construction equipment to be located closer to a building than its critical distance, vibration mitigation options will be proposed.

Historic Resources

Some project construction activities would occur within 400 feet of historic resources. Construction activities have the potential to result in inadvertent damage to fragile, historic structures in close proximity to the construction zone, including through direct physical damage or through vibration-related

damage. The EIS will document procedures to protect these structures from such damage to the extent practicable.

Open Space

Construction of the Proposed Project would have potential temporary effects on adjacent open spaces, including access changes and potential use for construction staging. An assessment of the Proposed Project's temporary effects on adjacent publicly accessible open spaces during construction will be provided.

Natural Resources

Because construction is planned to occur in areas in and adjacent to sensitive natural resources, including wetlands, streams, and the Kill Van Kull shoreline, construction impacts to these resources will be evaluated. This evaluation will include assessing the acreage of temporary disturbance to sensitive resources, the amount of vegetation removal, and the potential for water quality impacts to wetlands and surface waters from erosion and sedimentation of exposed soils. Mitigation measures may include Stormwater Pollution Prevention Plans (SWPPPs), Erosion and Sediment Control (ESC) plans, and best management practices (BMPs) to control erosion and sedimentation from runoff and provide water quality treatment to remove pollutants before runoff is discharged into surface waters. Mitigation measures will be developed in coordination with agencies with jurisdiction, including the USACE and NYSDEC.

Hazardous Materials

The EIS will describe any construction procedures for the Proposed Project that may result in disturbances of hazardous waste and contaminated materials, including asbestos-containing materials. The analysis will identify the need for additional site investigation (e.g., collection and laboratory analysis of soil, groundwater, or soil vapor samples) and procedures required to reduce the potential for adverse impacts due to hazardous materials, including procedures during construction to manage and dispose of excavated material and procedures to protect the health of local residents and Proposed Project construction workers.

Other Technical Areas

As appropriate, other areas of environmental assessment for potential construction-related impacts will be discussed, including but not limited to socioeconomic conditions, community facilities, and land use and neighborhood character.

Environmental Justice

Pursuant to Executive Order 12898, an environmental justice analysis will be prepared to identify any disproportionately high and adverse impacts on minority or low-income populations that could result from the Proposed Project. The analysis will follow methodologies and guidance established by the CEQ, USDOT Order 5610.2(a), and FTA Circular 4703.1. Similarly, the analysis will be consistent with NYSDEC environmental justice guidance (CP-29). The analysis will contain the following components:

- In general, the environmental justice analysis study area will include block groups (consistent with 2020 U.S. Census geographies) that intersect the area within 400 feet of the Proposed Project limits, including the corridor and proposed station locations. The analysis will be conducted for all block groups that intersect this area, even if portions of those block groups are outside the 400-foot radius. If the technical analyses indicate potential for adverse impacts in areas outside this radius, the study area will be expanded accordingly.
- Environmental justice communities (minority or low-income populations) within the study area will be identified using data from the 2020 U.S. Census and the most recent American Community Survey (ACS). If applicable, this may be supplemented by local data as described in FTA Circular 4703.1.
- The environmental justice analysis will examine the potential effects of the Proposed Project for the full range of environmental topic areas addressed in the EIS and determine whether the Proposed Project would result in disproportionately high and adverse impacts (direct or indirect) on minority and low-income populations.
- If the potential for disproportionately high and adverse impacts is identified, potential measures to mitigate impacts on environmental justice communities will be identified.
- This analysis will also identify and describe efforts to engage environmental justice communities in the Proposed Project study area.

Mitigation

Where adverse impacts that meet thresholds for significance, including those enumerated in the *CEQR Technical Manual*, have been identified for the Proposed Project, measures to mitigate those impacts will be described. The mitigation chapter will address the anticipated impacts requiring mitigation, likely mitigation measures, and the timing of the mitigation measures. Where impacts cannot be practicably mitigated, they will be disclosed as unavoidable adverse impacts.

Alternatives

SEQRA requires an analysis of a No-Action condition (without the Proposed Project), which in this case assumes that the existing former railroad right-of-way would not be used for transit and that transit service on Staten Island would remain at its current levels. Other alternatives to be considered include the Proposed Project alternatives eliminated based on analyses performed as part of the 2012 SINSAA. In addition, design variations may be analyzed in some areas (e.g., at-grade vs. overwater structure in areas where shoreline erosion has affected the former rail right-of-way).

Summary EIS Chapters

Several summary chapters will be prepared, focusing on various aspects of the EIS, as set forth in the SEQRA regulations and the *CEQR Technical Manual*. They are as follows:

- **Executive Summary.** Once the EIS technical analyses have been prepared, a concise executive summary will be drafted. The executive summary will utilize relevant material from the body of the EIS to describe the Proposed Project, the environmental impacts, measures to mitigate those impacts, and alternatives to the Proposed Project.
- **Unavoidable Adverse Impacts.** This chapter will describe those impacts, if any, that could not be avoided and could not be practicably mitigated.
- **Growth-Inducing Aspects of the Proposed Project.** This chapter will focus on whether the Proposed Project has the potential to induce new development within the surrounding area.
- **Irreversible and Irretrievable Commitments of Resources.** This chapter focuses on those resources that would be irretrievably committed if the Proposed Project is built

6 Agency and Public Involvement

MTA will provide opportunities for open, collaborative, and meaningful public and agency participation throughout the SEQRA environmental review process. Agencies, key stakeholders, and the public will be notified of key opportunities to participate, including opportunities to review and comment on pertinent environmental documents. Notifications will appear in the various official and local publications required under SEQRA, as well as via the MTA web site.

Meetings will be held with relevant agencies throughout the EIS process to update them on the status of the Proposed Project and discuss topics related to their regulatory responsibilities. An Agency Coordination and Public Outreach Plan (ACPOP) has been prepared for the Proposed Project and will serve as guidance throughout the SEQRA process. The ACPOP identifies the forums and means of communication appropriate to informing stakeholders about the environmental review process and obtaining their input. In addition, the ACPOP outlines the ways in which MTA will address communities with special needs, including limited English proficiency (LEP), minority, and/or low-income communities, in conformance with applicable requirements, such as NYSDEC guidance (CP-29) and Executive Order 12898 on Environmental Justice.

If NEPA compliance is undertaken at some point in the future (e.g., by FTA after the SEQRA process), an Agency Coordination Plan (ACP) will be prepared and published in accordance with FTA requirements. It is expected that the ACP would build on the ACPOP and would include agencies that FTA would invite to serve as Cooperating or Participating agencies under NEPA, pursuant to Council

on Environmental Quality (CEQ) regulations (40 CFR § 1508.5).[31] Cooperating and Participating agencies are responsible for identifying, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval. These agencies, along with FTA, will be kept informed throughout the SEQRA EIS process as part of the ACPOP.

Summary of Outreach to Date

In addition to the development of the ACPOP, public outreach activities undertaken to date in support of the Proposed Project have included the compilation of a study database that includes information such as project contacts and meeting materials; the preparation and distribution of public information materials (e.g., fact sheet, informative posters placed on MTA-NYCT buses); and the implementation of a project website (https://new.mta.info/northshoreeis). MTA will maintain the project database and website throughout the environmental review process. Materials will continue to be prepared to support transparent and documented stakeholder outreach.

As described in Chapter 3 of this document, the 2012 SINSAA and 2019 Supplement were prepared with significant public participation. Information about the public process undertaken can be found in these documents, which are accessible on the project website.

As part of the planning process an Interagency Advisory Committee (IAAC), which included city (local), state and federal stakeholders, was assembled. MTA hosted two Interagency Advisory Committee (IAAC) meetings during the preparation of the Supplement to provide detailed information about the advancement of the project studies to state and City agencies, including

[31] According to CEQ regulations, a "Cooperating" agency is any Federal agency, other than a Lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a Proposed Project or project alternative; a state or local agency of similar qualifications or, when the effects are on a reservation, a federally recognized Native American tribe, may also serve as a Cooperating agency. "Participating" agencies are those federal, state, or local agencies or federally recognized Native American tribes with an interest in the project. (In accordance with SAFETEA-LU Section 6002, Cooperating agencies are also Participating agencies.)

agencies that will be invited to participate in the environmental review process as "interested" or "involved" agencies. The IAAC meetings are intended to be a means of gathering input from these agencies pertaining to design and potential property acquisitions and related agency procedures. Two additional IAAC meetings were held at key milestones during the environmental review process to provide these stakeholders with the opportunity to guide the development of the technical analyses. In addition, individual meetings will be held with key agencies, as needed, throughout the SEQRA process. MTA continues extensive coordination various City entities (e.g., New York City Department of City Planning, New York City Department of Parks and Recreation, and New York City Department of Transportation), PANYNJ, and other key stakeholders.

In addition to the IAAC, MTA has been meeting individually and collectively with local and state elected officials throughout the planning process. These meetings provide a local framework for the Proposed Action's development and they will continue through the environmental review process. In addition, MTA has met with some potentially affected property owners.

A Public Information Open House meeting was held on May 8, 2019, at Snug Harbor Cultural Center on Staten Island, with 50 attendees to support the planning process and inform the Supplement and the subsequent selection of the Preferred Alternative. Public meetings will be held at key milestones throughout the environmental process, with significant notice and advertisement.

MTA has also organized a Public Advisory Committee (PAC) that will meet throughout the environmental process. The PAC will include local advocacy, community, environmental and other organizations. The meetings are intended to provide an opportunity to disseminate information to the public via community leaders and organizations (other than elected officials and public agencies), and to provide an opportunity to inform MTA of community interests pertaining to the project and the environmental review.

Appendix A: Response to Comments on the Draft Scoping Document

Appendix A: Response to Comments on the Draft Scoping Document

A. Introduction

This appendix summarizes and responds to public comments on the Draft Scope of Work (Draft Scope) for the Staten Island North Shore Bus Rapid Transit (BRT) Project (the Proposed Project). These comments were received through a variety of methods, including verbally at a public hearing on October 17, 2019, and written submitted comments during the 60-day public comment period. All substantive comments received by November 18, 2019 have been reviewed and are summarized below.

Comments are organized by topic and generally follow the organization of the Draft Environmental Impact Statement (DEIS). The comments are summarized to convey the substance of the comments and are also grouped where multiple commentors expressed a similar view.

B. List of Commentors

The following is a list of individuals and organizations who commented on the Draft Scoping Document.

Agencies and Elected Officials

1. Charles Fall, NYS Assemblyman, 61st Assembly District (Fall), oral comments at public meeting.
2. City of New York Office of the Mayor (Various Agencies via Mayor's Office of Environmental Coordination) (MOEC), written comments.
3. U.S. Environmental Protection Agency (EPA), written comments.
4. Port Authority of New York and New Jersey (PANYNJ), written comments.
5. Nicholas Zvegintzov, Chair, Transportation Committee SI Community Board 1 (Zvegintzov), oral comments at public meeting.

General Public and Organizations

1. Barbara Wood, Resident (Wood), written comments at public meeting.
2. Saul Porter, Port Richmond Strong (Porter), written comments at public meeting.
3. Alexandra Patrone, Director of Operations and Capital Projects, Snug Harbor (Patrone), written comments at public meeting.
4. Michael Sherrell, Resident (Sherrell), written comments at public meeting.
5. Anne Taylor, Resident (Taylor), written comments at public meeting.
6. Kathleen Bielsa, Deputy Director, Northfield LDC (Bielsa), written comments at public meeting.
7. Erik Seims (Seims), written comments at public meeting.
8. Man Ho Lee (Lee), written comments at public meeting.
9. Larry Penner (Penner), oral comments at public meeting.
10. Saul Porter, Healthy Housing Associate, SIEDC; Founder, Port Richmond Strong (Porter), oral comments at public meeting.
11. Rose Uscianowski, Organizer, Transportation Alternatives (Uscianowski), oral comments at public meeting.

12. Linda Baran, President & CEO, SI Chamber of Commerce (Baran), oral comments at public meeting.
13. Imarana Sayed, Resident (Sayed), oral comments at public meeting.
14. Robert DeBiase, Transportation Alternatives (DeBiase), oral comments at public meeting.
15. Claudia Toback, Resident (Toback), oral comments at public meeting.
16. Laura Barlament, Resident; Volunteer, Transportation Alternatives (Barlament), oral comments at public meeting.
17. Walter Warren, Resident (Warren), oral comments at public meeting.
18. Alfred Fahrt (Fahrt), written comments at public meeting.
19. Marie Therency-Broadnax (Therency-Broadnax), written comments at public meeting.
20. Noah Teixeira (Teixeira), written comments at public meeting.
21. Patrick Hyland (Hyland), written comments at public meeting.
22. Daniel Atha (Atha), written comments at public meeting.
23. Susan Gill (Gill), written comments at public meeting.
24. Gina Speirs (Speirs), written comments at public meeting.
25. Ira Gershenhorn (Gershenhorn), written comments at public meeting.

C. Comments and Responses

Comments Pertaining to Project Purpose and Need

Comment 1-1. There is no concrete information on the benefits of the proposal. Frequency of service and other time saving features of transit are a way to get better "buy in". (Sherrell)

Response 1-1. The Proposed Project's goals and objectives are listed on p. 21 of the Draft Scoping Document, including providing increased and improved travel options along Staten Island's North Shore, improving transit reliability, and reducing roadway congestion by attracting auto users to transit.

Comment 1-2. Time and money would be better spent to extend the SIRTOA line to circumnavigate the entire Island in both directions and to additionally provide a connection to the New Jersey rail lines. This could be done with cooperation between the MTA and the Port Authority of NY & NJ. (Taylor)

Response 1-2. Comment noted. As described on p. 22 of the Draft Scoping Document, the 2012 *Staten Island North Shore Alternatives Analysis* (SINSAA) identified and evaluated eight alternatives representing a mix of transportation modes, including Heavy Rail along the Staten Island Railway, Diesel Light Rail, and Electric Light Rail. The alternatives were compared in terms of their ability to meet the goals and objectives of the study. The SINSAA concluded that the BRT Alternative had the potential to reduce travel time, improve transit access, and attract new riders while having a lower capital cost than the other alternatives.

Comment 1-3. The project scope is limited and has minimal funding. Other agencies, including the Port Authority, Amtrak, and the MTA, should be involved to combine resources and connect Staten Island to New Jersey and Brooklyn. Rail connections such as a third Amtrak tunnel to Brooklyn

should be considered. Having a bus route that equals an already existing bus route doesn't make a lot of sense. (Warren)

Response 1-3. As noted in the Draft Scoping Document, the purpose of the Proposed Project is to:

- Provide frequent, efficient, and reliable transit to serve growing demand on the North and West Shores of Staten Island.

- Facilitate improved connections between Staten Island neighborhoods and existing North and West Shore activity centers, industries, and employment centers.

- Offer a reliable and cost-effective transportation solution that supports adopted City and community-endorsed public policy initiatives. such as the North Shore 2030, pertaining to economic growth and development.

- Maximize transportation use of the former and currently unused North Shore Railroad right-of-way while minimizing property acquisition and disruption to the community and businesses.

Connections to New Jersey and Brooklyn do not meet the purpose and need of the Proposed Project.

Comment 1-4. As discussed in the background section of the Draft Scope, since 2011, DCP and other City agencies have partnered with local stakeholders to produce or contribute to several local community planning studies, including North Shore 2030, West Brighton Brownfield Opportunity Area, and Port Richmond Brownfield Opportunity Area. These studies identified the following community-based strategies for guiding private and public investment in the North Shore: supporting and creating neighborhood centers; creating quality jobs and workspaces; improving access to the waterfront parks, and open spaces; improving connections and mobility; and addressing environmental challenges. These reports also provide a list of recommendations and City commitments toward achieving the community's vision for the North Shore. The Project proposal and the North Shore right-of-way closely relate to these strategies and recommendations, which include land use and zoning changes near proposed BRT stations, infrastructure improvements to the Richmond Terrace corridor, improvements to parks and waterfront open spaces, and coordination with local business owners with properties along the North Shore right-of-way. NYCT should consider the strategies and recommendations from these studies during the Environmental Review process (e.g. in the "Land Use, Zoning, and Public Policy" analysis) for the project to ensure that the proposal is consistent with and supportive of the community's vision for the North Shore. (MOEC)

Response 1-4. As noted in Section 5 of the Draft Scoping Document (p.39), the EIS will evaluate the Proposed Project's consistency with officially approved or adopted public policy initiatives and community plans, including but not limited to North Shore 2030 and the Port Richmond and West Brighton Brownfield Opportunity Areas (BOAs).

Comment 1-5. The City agrees that there are pressing transportation related issues along the North and West Shore of Staten Island, where demand for transportation is higher than the rest of Staten Island. Demand is growing and buses are overcrowded at the peak period. The EIS should describe the efforts being undertaken by NYCT to better accommodate the needs of residents,

workers and visitors to reduce trips made by private or for-hire vehicles and how the proposed Project is addressing these needs. (MOEC)

Response 1-5. As noted on p.20 of the Draft Scoping Document, the Proposed Project is a transportation improvement project, offering a new modal choice, that is intended to improve transit accessibility, reduce travel time, improve reliability, and support Staten Island's growth objectives. Accordingly, the Proposed Project is consistent with the MTA's mission to preserve and enhance the quality of life and economic health of the region it serves through the cost-effective provision of safe, on-time, reliable and clean transportation services. This will be noted in the EIS.

Comments Pertaining to Project Funding

Comment 2-1. Something critical is missing from the public hearing for the proposed Environmental Impact Statement. The Federal Transit Administration previously announced on May 15th a notice of opportunity to apply for $423 million in federal year 2019 competitive grant money for bus and bus facility projects nationwide. The other FTA grant programs for urban area reform 5307, capital annual investment 5309, new starts buses and bus facilities 5339, congestion relation urban quality, and several of the Federal Highway Administration grant programs which can be transferred to FTA. (Penner). The MTA receives $1.4 million annual funding from FTA and various grant programs during the Federal Fiscal Year. Why would the MTA forfeit this potential federal funding for this project? (Penner)

Response 2-1. Funding for the project has yet to be determined. As described on p. 8 of the Draft Scoping Document, the Proposed Project may apply for federal funding from the Federal Transit Administration (FTA); FTA determined that early National Environmental Policy Act (NEPA) scoping concurrent with the State Environmental; Quality Review Act (SEQRA) scoping process was appropriate for the Proposed Project and published an early scoping notice in the Federal Register on September 30, 2019.

Comment 2-2. It is frustrating that the project is not listed in the MTA capital plan and that there has been no other funding. Is this project a priority for the MTA? Funding should be included in the next MTA capital plan (Fall, Baran). The system may not be operating until 2030 given the time for preliminary design, final design, engineering, procurement, construction, and notice of contract and beneficial use (Penner).

Response 2-2. As noted in the response to Comment 2-1, funding for the project has yet to be determined.

Comment 2-3. The proposed project is in the New York-Northern New Jersey-Long Island, NY-NJ-CT serious nonattainment area for ozone. If this project requires federal funding, it will need to be included in the New York Metropolitan Transportation Council's Transportation Improvement Program. (EPA)

Response 2-3. The North Shore Project is currently not listed in the New York Metropolitan Transportation Council's (NYMTC) Federal Fiscal Years 2020-2024 Transportation

Improvement Program. Should the project seek federal funding, the project will be added to the NYMTC's Transportation Improvement Program as appropriate.

Comments Pertaining to Service Plan/Proposed Route

Comment 3-1. The BRT service plan should include routes along Bay Street and Richmond Terrace, Tompkins Avenue and Jersey Street to Arlington, and Bay Street and Jersey Street to Arlington. (Wood, Seims)

Response 3-1. As described in the Draft Scoping Document, in August 2012, MTA published the SINSAA, which assessed the implementation of new or enhanced transit service along the North and West Shores of Staten Island between West Shore Plaza and St. George Terminal. The 2012 SINSAA identified and evaluated eight alternatives representing a mix of modes, routes, alignments and termini with a desired re-use of the former North Shore Railroad right-of-way for transit service. After extensive analysis as well as stakeholder and public outreach, the 2012 SINSAA and 2019 supplement to the 2012 SINSAA identified the BRT Alternative as the Preferred Alternative based on its potential to reduce travel time, improve transit access, and attract the most riders with lower capital and operating costs than the LRT Alternative.

As noted on p. 28 of the Draft Scoping Document, based on the findings of the 2012 SINSAA, BRT service under the Proposed Project would be provided on two routes, the S1 and S2. The S1 would operate via an enhanced on-street South Avenue bus corridor from the West Shore Plaza commercial center to the new, proposed Arlington Station, where it would enter the busway for the remainder of the trip to St. George. This route would create connectivity between West Shore Plaza, South Avenue communities and the St. George Terminal. The S2 would travel between the St. George Terminal and the Teleport in peak hours and St. George and Arlington in off-peak hours. Other local bus service (S53, S54, S57, and S59) would also be able to enter the busway at access points to provide improved travel times.

Additional BRT routes would not meet the purpose and need of the Proposed Project.

Comment 3-2. A stop should be added or an existing stop should be shifted to serve access to Snug Harbor. Snug Harbor's role as the North Shore's cultural anchor and its growing impact on North Shore growth supports this need. A Snug stop will also encourage more tourist travel from the ferry and new growth at Empire Outlets. (Patrone)

Response 3-2. The MTA is proposing seven new BRT stations and three on-street South Avenue stops. Of the seven new stations, the New Brighton Station is proposed to be located along Richmond Terrace between Clinton Avenue and Tysen Street. In addition, the Livingston Station is proposed to be located along Richmond Terrace between Davis and Bard Avenues. These stations would serve the New Brighton Waterfront and Snug Harbor area.

Comment 3-3. What alternatives to the viaduct are being considered if the viaduct is not a feasible option? If buses have to run on the street, routes would be along the most congested streets in Staten Island. The proposed plan doesn't work well if the viaduct and the last half mile plan don't go as envisioned in this proposal. (Porter)

Response 3-3. As noted on p. 22 of the Draft Scoping Document, the 2012 SINSAA identified and evaluated eight alternatives representing a mix of modes, routes, alignments and termini with a desired re-use of the former North Shore Railroad right-of-way for transit service. This long list of alternatives was evaluated based on their ability to satisfy the project goals and their overall feasibility. Alternatives deemed infeasible were not advanced for further study. The Supplement to the 2012 SINSAA provided an updated evaluation that confirmed the feasibility of the BRT alternative.

The Proposed Project would be designed to provide the necessary structural capacity in all portions of the alignment, including the viaduct.

Comment 3-4. The MTA should look at options along the entire route that would potentially include bicycle and pedestrian access along the right-of-way. Bus Rapid Transit should not have to preclude pedestrian and bicycle access to the waterfront anywhere along the route. (Uscianowski)

Response 3-4. The Proposed Project would not preclude pedestrian and bicycle access to the waterfront. The busway would include two lanes dedicated to NYCT buses. Bicycles and private automobiles would be prohibited from utilizing the busway.

Comment 3-5. Routes to Newark Airport, Downtown Elizabeth NJ Transit station, and Metropark should be considered for increased regional connectivity between Staten Island and New Jersey as well as coordination with the Port Authority of New York & New Jersey. (Seims, Baran, Warren)

Response 3-5. Project coordination between the Port Authority of New York & New Jersey (PANYNJ) and MTA is ongoing. However, connections to New Jersey do not meet the purpose and need of the Proposed Project.

Comment 3-6. Would the route near Snug Harbor would be built at a higher grade than the existing right-of-way? There are existing waterfront access issues; a raised busway could re-use limited right-of-way and separate bicyclists and automobiles from the busway. (Zvegintzov, Warren)

Response 3-6. As described on p. 32 of the Draft Scoping Document, the BRT design for the Snug Harbor area would be to restore the submerged ROW and bulkhead through the creation of an elevated berm. The busway would be dedicated for NYCT buses. Bicycles and private automobiles will be prohibited from utilizing the busway.

Comment 3-7. Routes should be located on higher ground due to climate change impacts on safety and security along the water's edge. (Atha, Gershenhorn, Gill)

Response 3-7. After an extensive evaluation of multiple alternatives, the proposed alignment was determined to cost-effectively improve transit accessibility, while avoiding or minimizing impacts on the environment. As described on p. 67 of the Draft Scoping Document, because the study area is located in a flood hazard zone, the potential impacts of climate change on the Proposed Project will also be evaluated. The

discussion will focus on sea level rise and changes in storm frequency projected to result from global climate change and the potential future impact of those changes on the Proposed Project's infrastructure.

Comment 3-8. The U.S. Army Corps of Engineers, New York District is undertaking a feasibility study to examine measures to improve navigation within the constructed 50-foot New York and New Jersey Harbor. This may include widening of the Kill Van Kull navigation channel in order to allow two large container vessels to transit the Kill in opposite directions. Widening of the Kill Van Kull navigation channel may impact this project directly. (EPA)

Response 3-8. MTA will request additional information from the U.S. Army Corps of Engineers regarding the widening of the Kill Van Kull navigation channel, such as project scope, location, and schedule. Relevant information will be included in the EIS analyses.

Comment 3-9. The PANYNJ requests that the EIS include in its Scope an investigation of the future rail infrastructure necessary to accommodate planned maritime cargo growth at the Howland Hook Marine Terminal (HHMT), as well as any necessary security, operation, and maintenance facilities required to support current and potential future rail infrastructure. This investigation should include review of the Port Authority's Port Master Plan and input from relevant stakeholders, such as GCT New York (which operates HHMT) and the railroads that provide service to ExpressRail-Staten Island (PANYNJ).

The Draft Scope states that the Project and existing rail freight service can "safely coexist" between Van Name Street and Roxbury Street. The EIS should describe design and operational elements of the proposed Project that would ensure this safe coexistence and describe the safety due diligence that has/will be conducted during the engineering and design of the Project. The Project's potential effects on freight rail operation during construction and post implementation should be evaluated and stated explicitly in the EIS and potential impacts, based on FTA standards and the City's needs, should be addressed. (MOEC)

Response 3-9. Project coordination between the PANYNJ and MTA is ongoing. Design and operational elements of the proposed alignment, as well as coordination efforts with the PANYNJ, will be described in the Project Description chapter of the EIS. As stated on p. 63 of the Draft Scoping Document, project-related effects on existing and future freight rail during project construction and operation will be described in the Transportation chapter of the EIS, and, if warranted, appropriate mitigation measures will be proposed.

Relevant public policy initiatives, including the PANYNJ's Port Master Plan, will be reviewed in the Land Use, Zoning and Public Policy chapter of the EIS. The Land Use, Zoning and Public Policy section of this Final Scoping Document notes the inclusion of the PANYNJ's Port Master Plan.

Comments Pertaining to Richmond Terrace Alignment

Comment 4-1. Why was this pathway chosen? (Sherrell)

Response 4-1. As noted on p. 22 of the Draft Scoping Document, the 2012 SINSAA identified and evaluated eight alternatives representing a mix of modes, routes, alignments and termini with a desired re-use of the former North Shore Railroad right-of-way for transit service. Three of the eight alternatives were advanced and further developed as part of a "Short List," including Transportation Systems Management (TSM), Electric Light Rail (LRT – St. George to West Shore Plaza), and Bus Rapid Transit (BRT – St. George to West Shore Plaza) alternatives. The TSM Alternative was not advanced as it was determined to be the least effective in terms of improving mobility and meeting the project goals and objectives. Ultimately, after extensive analysis as well as stakeholder and public outreach, the 2012 SINSAA identified the BRT Alternative as the Preferred Alternative based on its potential to reduce travel time, improve transit access, and attract the most riders with lower capital and operating costs than the LRT Alternative.

Comment 4-2. Does the placement of the parking garage and Empire Outlets serve as a block to the previous plan that was direct to the ferry terminal? There seems to be subway tracks under the parking garage, could that be a reason why? (Sherrell)

Response 4-2. Based on early project coordination and in consultation with NYCDOT, it was determined that an alignment that travelled beneath the Ferry Terminal and its associated retail corridor was not feasible, due primarily to security restrictions and, to a lesser extent, the inability to relocate critical equipment. This will be described in the Project Description chapter of the EIS. In addition, as noted in this Final Scoping Document, the St. George Terminal Access Evaluation Study will be provided as an appendix to the EIS.

Comment 4-3. CB1 supports the North Shore Transit to enhance community development and reduce existing commute times. CB1 urges continued planning and engineering to route buses completely off Richmond Terrace to the Ferry Terminal. The EIS should discuss alternative(s) to this on-street segment and alternatives for using the dedicated North Shore right-of-way all the way to the existing station under the Ferry Terminal. The present Environmental Outline should be withdrawn and revised to show full discussion of the alternatives for using the dedicated North Shore right-of-way all the way to the existing station under the Ferry Terminal, so that all engineering or jurisdictional problems can be solved (Zvegintzov).

Response 4-3. As described on p. 22 of the Draft Scoping Document, the 2012 SINSAA identified and evaluated eight alternatives representing a mix of modes, routes, alignments and termini with a desired re-use of the former North Shore Railroad right-of-way for transit service. In addition, as noted in this Final Scoping Document, the St. George Terminal Access Evaluation Study will be provided as an appendix to the EIS.

Comment 4-4. The on-street segment from Nicholas St. to the Ferry Terminal, comprising six lanes of traffic (seven at several turning lanes), presents multiple problems:

- Increasing instead of decreasing transit times.
- Eliminating parking, bus stops, and bike lane.

- Decreasing amenity by presenting a traffic wall between the waterfront esplanade / Ferry Terminal and Staten Island's civic center / 'downtown'.
- Blocking entrance to Borough Hall, the County Building, the 120 Precinct, Family Court, the Ballpark, and the Empire Outlets.
- Blocking automobile entrance to both commercial parking garages.
- Presenting a traffic wall to passengers moving from Staten Island's civic center to and from the Ferry Terminal. (Zvegintzov)

Response 4-4. As described on p. 60 of the Draft Scoping Document, the Transportation chapter of the EIS will evaluate effects on traffic, transit, pedestrians, parking, and bicycle lanes. Separate assessments of potential impacts on each individual technical area are used to determine whether a project may adversely affect a specific area of the transportation system.

Comment 4-5. There is support for mass transit, but there are concerns about how the last half mile will affect parking and traffic flow. MTA should look at some alternatives to the current plans for Bay Street (Fall). The BRT should not use Richmond Terrance near the SI Ferry, Police Station, Outlets and Ballpark. The BRT should travel over the water in order to avoid creating traffic problems and a reduction of street parking (Bielsa). The existing car traffic flow to and from the ferry terminal does not work well, especially for parking on the lower level or to meet people on the lower level. The BRT will not help improve this problem (Toback).

Response 4-5. As described on p. 60 of the Draft Scoping Document, the Transportation chapter of the EIS will evaluate effects on traffic, transit, pedestrians, parking, and bicycle lanes. Separate assessments of potential impacts on each individual technical area are used to determine whether a project may adversely affect a specific area of the transportation system. In addition, as noted in this Final Scoping Document, the St. George Terminal Access Evaluation Study will be provided as an appendix to the EIS.

Comment 4-6. It was said a few months ago that Councilwoman Rose was considering moving the 120 Precinct a little closer to the side, moving all the cars to make room for the parking for the outlet mall. That would be either a positive or negative for the proposed project depending if the outlet mall just takes that parking instead. It's not clear how much communication the project has with the elected officials and what their intended solutions are for this. (Porter)

Response 4-6. As described on p. 60 of the Draft Scoping Document, the Transportation chapter of the EIS will evaluate effects on traffic, transit, pedestrians, parking, and bicycle lanes. Separate assessments of potential impacts on each individual technical area are used to determine whether a project may adversely affect a specific area of the transportation system. This analysis will include future parking assumptions for new developments along the corridor through the Build Year, including potential changes to the 120th Precinct.

Comment 4-7. The Staten Island Chamber of Commerce does not support the alignment along Richmond Terrace and expressed concern about potential development impacts from Empire outlets and Lighthouse Point and continued growth along the North Shore. (Baran)

Response 4-7. As described on p. 60 of the Draft Scoping Document, the Transportation chapter of the EIS will evaluate effects on traffic, transit, pedestrians, parking, and bicycle lanes. Separate assessments of potential impacts on each individual technical area are used to determine whether a project may adversely affect a specific area of the transportation system.

Appropriate annual background growth rates will be determined through use of *CEQR Technical Manual* guidelines based on historical and current traffic counts. Trip generation assessments for programmed and potential development activities within the study area will also be conducted. In addition, as noted in this Final Scoping Document, the St. George Terminal Access Evaluation Study will be provided as an appendix to the EIS.

Comment 4-8. The last half mile of the Bus Rapid Transit should be routed on Richmond Terrace for multiple reasons. Space that is currently being used for vehicular traffic could be reallocated for mass transportation to create additional incentives for mass transit. Routes from multiple locations on Staten Island, including Hartman Village, would create great incentive for people who currently use their cars to get place like the mall, Empire Outlet mall and St. George Ferry as well as other establishments. (Uscianowski)

Response 4-8. Comment noted.

Comment 4-9. NYCT should continue to work with NYCDOT, Coast Guard and NYPD Counterterrorism to identify ways to mitigate safety and security concerns in and under the Staten Island Ferry Terminal, either through operational or physical changes, to allow the Project to remain in the existing right-of-way (ROW) and terminate at the lower level of the Terminal. (MOEC)

Response 4-9. MTA has and will continue to engage and coordinate with NYCDOT, New York Police Department (NYPD) and others as the project advances. Based on early project coordination and in consultation with NYCDOT, it was determined that an alignment that travelled beneath the Ferry Terminal and its associated retail corridor was not feasible, due primarily to security restrictions and, to a lesser extent, the inability to relocate critical equipment. More specifically, the restricted access designation for the Terminal facility was based on multiple comprehensive risk and vulnerability assessments which were conducted in accordance with 33 CFR Chapter 1, Subchapter 8, for compliance with the Maritime Transportation Security Act of 2002. The St. George Ferry Terminal and its immediate surroundings are designated as a Maritime Security (MARSEC) Level 1 facility. MARSEC refers to the United States Coast Guard's (USCG) three-tiered security levels, which are scaled to reflect the prevailing threat environment to maritime elements of the nation's nautical transportation infrastructure such as ports, vessels, passenger facilities and critical infrastructure/assets situated on or adjacent to the waters of the United States. Given NYCDOT's desire to maintain a secure area, options utilizing the lower level of the St. George Terminal were not advanced.

This will be described in the Project Description chapter of the EIS. In addition, this Final Scoping Document notes that the St. George Terminal Access Evaluation Study will be provided as an appendix to the EIS.

Comment 4-10. NYCT should consider routes alternative to Richmond Terrace due to known physical constraints of the area. Specifically, the City recommends continuing to investigate an alignment that utilizes the existing right of way and terminates buses in the Staten Island Ferry Terminal below grade. NYCT should also explore the possibility of procuring double ended buses (i.e., buses that don't need to turn around) to minimize impacts to the ferry terminal operations to make use of the existing ROW more viable. (MOEC)

Response 4-10. Please see the response to Comment 4-9 above. As noted on p. 71 of the Draft Scoping Document, alternatives to the proposed alignment (including those considered in the 2012 SINSAA and 2019 Supplement to the SINSAA) will be described in detail in the Project Description chapter of the EIS. In addition, this Final Scoping Document notes that the St. George Terminal Access Evaluation Study will be provided as an appendix to the EIS.

Comment 4-11. The 120th Precinct is located at 78 Richmond Terrace and opened in 1923. The precinct provides police services for a 14.5 square mile area. This area is home to more than 180,000 residents and has the highest volume of 911 calls for service in Staten Island. There are more than 400 police department employees assigned to this building, which also houses the borough's arrest processing facility. There are currently 57 department owned, emergency response vehicles assigned to this building. These emergency response vehicles require immediate, unobstructed access to Richmond Terrace to maintain an acceptable dispatch rate and response time to ensure the safety of the public and members of the department who require assistance.

The proposed Project would require utilization of Richmond Terrace from curb to curb making it impossible to park or even stop these emergency response vehicles in front of the 120th Precinct stationhouse. Department vehicles, assigned to emergency response to calls for service, cannot be housed off site or out of immediate access to assigned officers. Implementation of the Project as currently proposed would make it impossible to tactically stage department owned, emergency response vehicles, negatively impacting the 120th Precinct's ability to provide timely police services to the north shore of Staten Island. (MOEC)

Response 4-11. MTA has met with NYPD regarding the design of the busway in the vicinity of the 120th Precinct and will continue to coordinate with NYPD with respect to the Proposed Project and transit operations on Richmond Terrace. Any potential direct or indirect effects to the 120th Precinct will be disclosed in the Community Facilities chapter of the EIS.

Comment 4-12. The existing parking lots at the 120th Precinct are insufficient to accommodate the number of assigned vehicles and inadequate for emergency resource staging as they contain strict bottlenecks at each entrance/outlet making multiple-resource response impossible. (MOEC)

Response 4-12. The EIS will identify and address any project-related impacts to parking; however, addressing existing parking or facilities insufficiencies is not part of the project purpose and need.

Comment 4-13. EDC is proposing to implement an expansion of the Citywide Ferry Service which will include a new landing in St. George that is expected to begin service in 2020. This project should be included in the no-action condition for analysis. (MOEC)

Response 4-13. St. George NYC Ferry service will be considered in the Transportation chapter of the EIS.

Comment 4-14. NYCT states that for the BRT alignment they are studying in the EIS they plan to use the median in Richmond Terrace to create a turn into the left turn lane. Please be aware that existing conditions and lane configurations on Richmond Terrace from Hamilton Ave to Schuyler Street will be modified prior to the analysis build year. The existing Richmond Terrace Median will be replaced with a south bound left turn lane and a north bound left turn bay at the Wall Street intersection.

Therefore, NYCT should include an autoturn analysis including delivery trucks to ensure those turning movements are possible with a center running transit alignment and analysis the level of service (LOS) of the Wall/Richmond intersection including projected left turning traffic in the North South through phase. NYCT should ensure that the proposed Project design appropriately reflects an updated alignment on Richmond Terrace. (MOEC)

Response 4-14. As stated in the Draft Scoping Document (p.62), the analysis will consider any programmed changes to roadway geometry. No Build geometry for these locations will be developed in consultation with NYCDOT. MTA will coordinate with NYCDOT on the geometric design of Richmond Terrace including preparation of vehicle turn analyses.

Comment 4-15. The BRT alignment to be studied in the EIS includes building a ramp at Nicholas Street, adjacent to the existing ramp constructed for the NY Wheel project, to bring the BRT onto Richmond Terrace.

NYCT should identify what actions are required to construct a ramp from the ROW to Richmond Terrace at Nicholas Street. Specifically, please identify if any of the public waterfront Esplanade north of Bank Street to be provided in support of the findings of the New York Wheel special permit would not be available or impacted.

NYCT should clarify if construction of the ramp would preclude provision of the proposed open space would a modification of that special permit be needed.

NYCT should also analyze the LOS of the Nicholas/Richmond intersection including the projected traffic related to the New York Wheel in the future no action and with action scenarios, and clearly identify and disclose the proposed phasing and timing of that intersection with BRT operations in the Transportation chapter of the DEIS. (MOEC)

Response 4-15. The proposed alignment is not anticipated to utilize the former Wheel property or preclude the future development of the site including the provision of open space as proposed in the St. George Waterfront Redevelopment EIS.

Analysis of this intersection of Richmond Terrace and Nicholas Street will be included in the Transportation chapter of the EIS. No Build projects, including traffic increments from the St. George Waterfront Redevelopment EIS, which includes

traffic related to the New York Wheel, will be included in the Transportation chapter of the EIS.

Comments Pertaining to Station Design

Comment 5-1. In the diagram for Port Richmond, there are no canopies over the stairways or to/from the elevators for very bad rainy weather. (Sherrell)

Response 5-1. The EIS will provide a detailed description of each proposed station, including proposed canopies.

Comment 5-2. There are stations in the cut that could benefit from the enhanced connectivity that a bicycle path could provide. There are lots of streets that come in towards the BRT perpendicular and when they meet the pathway, they can use that pathway to get to a station. And if the station had bicycle parking, the two could work together and they would enhance each other. (DeBiase)

Response 5-2. The Proposed Project would not preclude pedestrian and bicycle access to the waterfront; however, the busway would include two lanes dedicated to NYCT buses. Bicycles and private automobiles would be prohibited from utilizing the busway.

Comment 5-3. NYCT should provide scaled drawings for the proposed Project. Please provide all turning radii, etc. In addition, NYCT should provide the specific locations and layouts for the proposed stations. These stations may require additional elements to be analyzed if the effective sidewalk width is proposed to be narrowed by the station either by changes in curb alignment or placement of infrastructure such as shelters, etc., within the sidewalk, or if new pedestrian or vehicular trips are generated by the proposed action, or diverted by the proposed action. Also, additional analyses may be needed if stations are proposed at locations where the adjacent street does not have control devices allowing people to cross the street to access the stations. (MOEC)

Response 5-3. Conceptual plan sets and station layouts will be provided as an appendix to the EIS. Pedestrian elements leading to the proposed stations will be designed with consideration for the projected pedestrian demands. Pedestrian analyses will be performed at pedestrian elements near the proposed stations where the magnitude of project-generated pedestrian trips would exceed the *CEQR Technical Manual* thresholds for analysis, as well as traffic analysis for new station entrances.

Comment 5-4. NYCT should provide more details regarding surface parking facilities at Arlington Station and Livingston Station such as the number of parking spaces, drawings including all proposed curb cuts, etc. Please provide the travel demand assumptions, as well as vehicular and pedestrian assignment maps to determine the appropriate locations to be considered in the analyses. (MOEC)

Response 5-4. The Project Description chapter of the EIS will describe the number parking spaces at the surface parking facilities at the Arlington and Livingston Stations, The Transportation chapter of the EIS will include information regarding travel demand assumptions and trip assignments.

Comments Pertaining to Pedestrian and Bicycle Access

Comment 6-1. The design should include space for pedestrians and cyclists along the right-of-way (Uscianowski). An easement on the south side of the BRT from John Street to South Avenue could allocate land for a future bikeway to be constructed by others. The easement could be part of the path from the Goethals Bridge to the Bayonne Bridge (DeBiase). The existing bike lane along Richmond Terrace provides strategic connectivity of bicycles through the entire North Shore. Removing it would destroy the entire connectivity of the North Shore. Bicycles must be able to access the borough hall side of the BRT and the Staten Island Ferry going west towards Snug Harbor and going east towards Fort Wadsworth without having to walk bikes up and down stairs (DeBiase).

Response 6-1. The Proposed Project would not preclude pedestrian and bicycle access to the waterfront; however, the busway would include two lanes dedicated to NYCT buses. Bicycles and private automobiles would be prohibited from utilizing the busway.

Comment 6-2. The project should not eliminate or negatively impact existing bike lanes. Bicycling is a preferred mode to access the Staten Island Ferry. (Barlament)

Response 6-2. Potential effects of the Proposed Project on the existing bike network will be discussed in the Transportation chapter.

Comments Pertaining to Resiliency

Comment 7-1. The proposal does not appear to take into account projected sea level rise. Portions of the roadway from St. George to Richmond Terrace are at current sea level or only slightly above current sea level. Why is NYC Parks proposing to spend billions of dollars to raise the East River Park because of predicted sea level rise while at the same time the MTA is proposing to spend millions to build transportation infrastructure that is predicted to be under water very soon? (Atha, Gershenhorn)

Response 7-1. As described on p. 67 of the Draft Scoping Document, because the study area is in a flood hazard zone, the potential impacts of climate change on the Proposed Project will also be evaluated. The discussion will focus on sea level rise and changes in storm frequency projected to result from global climate change and the potential future impact of those changes on the Proposed Project's infrastructure.

Comment 7-2. The project will have negative impacts on the shoreline ecology that is necessary to mitigate climate change and projected sea level rise (Atha, Gershenhorn). An alternative plan is also requested (Speirs).

Response 7-2. After an extensive evaluation of multiple alternatives, the proposed alignment was determined to cost-effectively improve transit accessibility, while avoiding or minimizing impacts on the environment. As described on p. 55 of the Draft Scoping Document, the EIS will evaluate effects to natural resources, including surface water bodies and groundwater; wetlands; terrestrial resources; shoreline resources; gardens and other ornamental landscaping; and natural resources that may be associated with built resources, such as old piers and other waterfront structures.

The conceptual engineering effort associated with the Proposed Project is focused on impact avoidance, minimization and mitigation, where applicable. The Proposed Project has been refined to minimize impacts to natural resources, such as wetlands. If impacts are identified, appropriate avoidance and mitigation measures will be developed.

Comment 7-3. Under the Greenhouse Gas Emission and Climate Change section NYCT states the "potential impacts of climate change on the Proposed Project will also be evaluated" and that "design measures to increase infrastructure resiliency will also be discussed" (pg. 65).

Given the erosion that has occurred to the portion of the ROW along the shoreline, and the fact that portions of the study area (and surrounding communities) are in flood zones and therefore more vulnerable to climate change, the EIS analysis should describe the components of the proposed project that would be responsive to climate change and flooding in the area. (MOEC)

Response 7-3. As noted on p. 65 of the Draft Scoping Document, the Greenhouse Gas Emissions and Climate Change chapter of the EIS will include a discussion of project-related design measures intended to increase the resiliency of the proposed BRT alignment and ancillary features.

Comment 7-4. EPA recommends that FTA provide a summary discussion of climate change and ongoing and reasonably foreseeable effects of climate change relevant to the project and the project study area. These future climate scenarios included in the assessments can be useful when considering measures to improve the resiliency of the proposed project to the impacts of climate change, as well as for developing mitigation for potential impacts of the proposal that will be exacerbated by climate change. (EPA)

Response 7-4. As described on p. 67 of the Draft Scoping Document, the EIS will include an analysis of climate change. This chapter of the EIS will assess greenhouse gas (GHG) emissions associated with the Proposed Project and assess the consistency of the Proposed Project with the City's established GHG reduction goal. In addition, the potential impacts of climate change on the Proposed Project will also be evaluated. The discussion will focus on sea level rise and changes in storm frequency projected to result from global climate change and the potential future impact of those changes on the Proposed Project's infrastructure. Design measures to increase infrastructure resiliency will also be discussed.

Comments Pertaining to Historic, Cultural, and Environmental Resources

Comment 8-1. The Reformed Church on Staten Island (54 Port Richmond Ace) is within 400 feet of Port Richmond Station and on the National Register of Historic Places. (Porter)

Response 8-1. Comment noted. As described on p. 54 of the Draft Scoping Document, the historic and cultural resources assessment will evaluate the potential for the Proposed Project to have impacts on architectural and archaeological resources located within the Area of Potential Effects.

Comment 8-2. There are concerns about negative impacts to open space, hardening shorelines, habitat loss, and missed opportunities for green infrastructure. Green infrastructure and parkland have recreational, environmental, and emotional benefits for people's wellbeing. High speed roadways at the water's edge are a bad public policy. Alternatives away from the water's edge should be considered. (Atha, Gershenhorn, Gill)

Response 8-2. After an extensive evaluation of multiple alternatives, the proposed alignment was determined to cost-effectively improve transit accessibility, while avoiding or minimizing impacts on the environment. As described on p. 55 of the Draft Scoping Document, the EIS will evaluate effects to natural resources, including surface water bodies and groundwater; wetlands; terrestrial resources; shoreline resources; gardens and other ornamental landscaping; and natural resources that may be associated with built resources, such as old piers and other waterfront structures. The conceptual engineering effort associated with the Proposed Project is focused on impact avoidance, minimization and mitigation, where applicable. The Proposed Project has been refined to minimize impacts to natural resources, such as wetlands. If impacts are identified, appropriate avoidance and mitigation measures will be developed.

Comment 8-3. Under Open Space impacts (page 51) the document asserts that the proposed project would not increase the residential or employee population in the study area. New transit investments have been proven to increase residential and workforce populations. The Draft Scope should be revised to include an analysis of potential indirect open space impacts that may result from the proposed project. (MOEC)

Response 8-3. As described in the Purpose and Need statement (see pages 18-20 of the Draft Scoping Document), the Proposed Project is intended to serve existing high transit demand on the North and West Shores, as well as future demand resulting from planned residential and business growth in the service area. This future growth would result from implementing adopted land use and economic development plans for the study area, not from the presence of the BRT infrastructure. As stated on p. 51 of the Draft Scoping Document, the Proposed Project would not increase the residential or employee population in the study area. As such, the Proposed Project would not have a direct or indirect effect on open space, and an analysis is not warranted according to *CEQR Technical Manual* guidelines.

Comment 8-4. The soil located along Bank Street, west of the NY Wheel site, is contaminated but after sampling and analyzing is approved by New York State Department of Environmental Conservation (NYSDEC) for reuse onsite. The soil will remain in its current location until a reuse has been determined.

The hazardous materials analysis should note that any excavation or disturbance of the soil in the area covered by NYSDEC Consent Order (to which EDC is subject) must be cleared with NYSDEC and monitored by an environmental monitor. (MOEC)

Response 8-4. The background and conditions related to the NY Wheel site will be described in the Hazardous Materials Chapter of the EIS.

Comment 8-5. In 1993, the Council of Environmental Quality guidance, Pollution Prevention and the National Environmental Policy Act, encouraged federal agencies to include the concepts of pollution prevention in EISs during the scoping alternatives analysis, mitigation measure development, and decision-making processes. (EPA)

Response 8-5. The 1993 Council of Environmental Quality (CEQ) defines "Pollution prevention" as reducing or eliminating hazardous or other polluting inputs, which can contribute to both point and nonpoint source pollution; modifying manufacturing, maintenance, or other industrial practices; modifying product designs; recycling (especially in-process, closed loop recycling); preventing the disposal and transfer of pollution from one media to another; and increasing energy efficiency and conservation.

As described in the Draft Scoping Document, the EIS will include analyses of Hazardous Materials, Air Quality, Water and Sewer Infrastructure, Energy, and Construction Impacts. Each analysis will include mitigation as warranted. As part of the construction analysis, pollution prevention measures may include Stormwater Pollution Prevention Plans (SWPPPs), Erosion and Sediment Control (ESC) plans, and best management practices (BMPs) to control erosion and sedimentation from runoff and provide water quality treatment to remove pollutants before runoff is discharged into surface waters. This was added to this Final Scoping Document.

Comment 8-6. Environmental Justice concerns should be analyzed and discussed in the EIS regarding the placement of the new stations, as well as construction impacts. (EPA)

Response 8-6. As described on page 73 of the Draft Scoping Document, an environmental justice analysis will be included in the EIS.

Comment 8-7. NYCT should reconsider locating parking for the BRT in DEC wetland. Disturbance of the wetlands is counter to projects the New York City Economic Development Corporation (EDC), the City and State, have been advancing in Staten Island and across New York City. Projects like the Saw Mill Creek Wetland Mitigation Bank, which helps to protect and preserve NYC's valuable wetland, while supporting investment in coastal infrastructure by allowing waterfront projects to purchase tidal wetland mitigation credits from the Bank. Impact to the wetlands is also counter to the City's overall resiliency goals. Past and ongoing private projects have impacted or destroyed wetlands in the same geographic area. The EIS should include a cumulative analysis of wetland and coastal impacts. (MOEC)

Response 8-7. The Natural Resources chapter of the EIS will evaluate the potential for impacts, avoidance, minimization and mitigation, where applicable. A Natural Resources Technical Report, which includes information regarding the wetland delineation, will be an Appendix to the EIS. This Final Scoping Document notes this.

Comments Pertaining to Transportation Analyses

Comment 9-1. The EIS proposed project description should describe the modifications being proposed for the viaduct structure to ensure the buses running on an elevated structure can do so safely, in terms of the structures ability to bear the load and physical changes necessary to ensure buses remain in their lanes on the viaduct. (MOEC)

Response 9-1. The Proposed Project will be designed to provide the necessary structural capacity in all portions of the alignment, including the viaduct. The EIS will describe the project design, including rehabilitation of and/or modifications to the viaduct, at a level of detail appropriate for the evaluation of impacts.

Comment 9-2. The Draft Scope should include the information for how the travel demand analysis, traffic analysis, parking analysis, transit analysis, and safety assessment will all be conducted. (MOEC)

Response 9-2. The respective methodologies will be documented in the Transportation chapter of the EIS, in accordance with guidelines identified in the *CEQR Technical Manual*.

Comment 9-3. The Draft Scope should explain any adjustments to existing bus routes. (MOEC)

Response 9-3. As noted on page 61 of the Draft Scoping Document, the Transportation chapter of the EIS will evaluate the impacts of the new BRT service on existing and planned bus transit use. This includes any modifications to existing bus routes as a result of the Proposed Project.

Comment 9-4. NYCT should provide the ridership projections, including the number of daily patrons at each station, peak hour and the mode and travel to/from the station, as well as assignment maps as necessary to determine the locations to be included in the analyses. (MOEC)

Response 9-4. The ridership projections will be documented and provided as an appendix to the EIS.

Comment 9-5. NYCT should note that any intersection that yields 50 or more auto trips during construction (during detour) may require detailed analysis. The Draft Scope currently states that only up to eight (8) intersections will be analyzed, but that claim cannot be made before providing construction related travel demand analysis and anticipated lane and/or roadway closures. Please provide this information in the updated Draft Scope. (MOEC)

Response 9-5. The EIS Construction chapter will include the construction related travel demand analysis and anticipated lane and/or roadway closures, and the construction traffic analysis locations will be identified per the *CEQR Technical Manual* guidelines, including the magnitude of construction vehicle trips at study area locations. The EIS Construction chapter will reflect any additional intersections that will be evaluated.

Comment 9-6. NYCT should provide justification for the hours selected for the peak hour analysis. (MOEC)

Response 9-6. This Final Scoping Document reflects that the peak traffic hours are based on Turning Movement Counts (TMCs). These peak traffic hours were developed in conjunction with NYCDOT.

Comment 9-7. NYCT should provide specific details related to the parking survey, including the number and locations for the loss of parking, areas where the parking supply and utilizations survey will be performed, etc. (MOEC)

Response 9-7. As stated on page 62 of the Draft Scoping Document, a parking analysis (which will include the information noted in the comment) will be provided as part of the EIS Transportation chapter and will focus on areas where curbside parking space will be displaced by the proposed alignment.

Comment 9-8. Conceptual drawings indicate that the BRT alignment would impact access to the A&A Landfill site (owned by CSX Transportation), which is currently under remediation. The EIS should analyze whether the proposed project would impede the future development of that site and suggest mitigation measures as appropriate. (MOEC)

Response 9-8. The Hazardous Materials chapter of the EIS will assess any potential impacts of the Proposed Project on the A&A Landfill site.

Comments Pertaining to Community Facilities, Socioeconomic Conditions and Noise

Comment 10-1. How would the BRT impact P.S. 59 if the route starts/ends on Nicholas Street and Richmond Terrace and the school is on the middle of the next block? How would the BRT on an existing elevated structure impact a charter school? (Sherrell). There is concern about how the BRT would impact P.S. 59, where many parents bring their children and buses stop, and about how the BRT would impact the charter school in Port Richmond. The extent of traffic is going to be considerable. (Toback)

Response 10-1. The Scoping Document does not include any analyses or impact conclusions. The Scoping Document serves as a guide for what will be studied in the EIS. As described on p. 52 of the Scoping Document, the community facilities and services assessment of the EIS will consider potential direct effects and indirect effects on community facilities.

As described on p. 60 of the Draft Scoping Document, the Transportation chapter of the EIS will evaluate effects on traffic, transit, pedestrians, parking, and bicyclists. Separate assessments of project impacts on each individual technical area are used to determine whether a project may adversely affect a specific area of the transportation system.

Comment 10-2. The ROW bisects (i.e., divides in half) two active water-dependent industrial uses situated along the Kill Van Kull (Caddell Dry Dock and Atlantic Salt). Caddell Dry Dock is a significant North Shore employer with more than 300 employees, offering essential repair services for a wide array of vessels that keep people and goods moving through the NY/NJ harbor. The current proposed BRT alignment may pose an impediment to Caddell's business because it may impede the drydocks ability to safely maneuver cranes and other yard equipment required to operate the dry dock. Atlantic Salt serves as one of the primary road salt providers to NYC Department of Sanitation. Atlantic Salt's provision of salt serves an essential public safety role in keeping the regions roads usable and safe during precipitation events. The current proposed BRT alignment may pose an impediment to Atlantic Salt's business because it may impede their ability to maintain adequate salt stockpiles and may impede access to the site by distribution trucks.

Therefore, the EIS should consider potential impacts to the operations of both businesses, describe coordination between NYCT and both businesses, and discuss what measures will be incorporated into

the proposed Project to avoid impacts to business operations. If adverse impacts may be expected, mitigation measures should be proposed as part of the EIS. (MOEC)

Response 10-2. Both Caddell Dry Dock and Atlantic Salt have been consulted in the development of the proposed alignment. Impacts to the operation of these businesses, along with any other affected businesses, will be described in the Socioeconomic Conditions chapter in the EIS.

Comment 10-3. The EIS should analyze potential impacts to the Snug Harbor area along the waterfront. There is concern about increasing interest and businesses there like along the Bay Street corridor. (Baran)

Response 10-3. Study areas for EIS analyses are based on the location where the Proposed Project is expected to have the greatest impact, directly or indirectly. For Socioeconomic Conditions, a study area reflects the scale of the project relative to the surrounding area's population and employment, ranging from an approximately 400 foot, one-quarter mile, or one-half mile radius, depending upon the project size and area characteristics. For the Proposed Project, a half-mile radius study area has been chosen based on the length of the corridor and the diverse nature of the areas through which it passes.

Comment 10-4. The section on noise impact methodology notes that the BRT operations would "alter traffic patterns to the surrounding local streets" and the subsequent changes in vehicle and bus noise have the potential to cause adverse impact to noise receptors. In addition, the noise impact analysis should also reflect that a portion of the proposed alignment running along the viaduct (i.e., above typical local streets) would introduce bus traffic on an elevated structure close to a number of sensitive receptors (such as adjacent residential buildings). The noise impact analysis should analyze this condition and propose mitigation measures as appropriate. (MOEC)

Response 10-4. The noise impact analysis contained in the Noise chapter of the EIS will evaluate future noise conditions with and without the project and propose mitigation measures if appropriate.

General Comments/Questions

Comment 11-1. The BRT should be implemented in other boroughs like Queens. BRT has been successful in other cities like Guangzhou or Bogota. Having buses run in dedicated bus only lanes and stations with platforms for loadings would provide New Yorkers with a new way to take the bus and solve congestion problems. (Lee)

Response 11-1. BRT in Queens does not meet the purpose and need of the Proposed Project.

Comment 11-2. Why is the MTA following the State SEQRA and not the federal National Environmental Protection Act? Following NEPA is necessary for potential federal funding. (Penner)

Response 11-2. As described on p. 8 of the Draft Scoping Document, the Proposed Project may apply for federal funding from the Federal Transit Administration (FTA). If the MTA intends to seek federal funding to support the capital construction of the Build Alternative, the Proposed Project will require a separate analysis under the

requirements of NEPA. The FTA would be the lead agency for NEPA compliance. MTA-NYCT and the FTA have agreed that NEPA will occur subsequent to and separately from the SEQRA process.

Comment 11-3. While the project is important to the Staten Island Chamber of Commerce, there is concern with the number of impacts and the timeframe of the project. (Baran)

Response 11-3. The EIS will disclose the potential for significant adverse impacts and include proposed mitigation for any such sited impacts.

Comment 11-4. There is concern about station access and reduced fares for seniors. (Sayed)

Response 11-4. All stations will be Americans with Disabilities Act (ADA)-compliant.

Comment 11-5. There is support of Bus Rapid Transit and more public transportation options on Staten Island. (Barlament)

Response 11-5. Comment noted.

Comment 11-6. What happens if the BRT fails? How do you undo your bus route so that it could become a train in the future? (Warren)

Response 11-6. As noted on p. 22 of the Draft Scoping Document, the 2012 SINSAA identified and evaluated eight alternatives representing a mix of modes, routes, alignments and termini with a desired re-use of the former North Shore Railroad right-of-way for transit service. This long list of alternatives was evaluated based on their ability to satisfy the project goals and their overall feasibility. Alternatives deemed infeasible were not advanced for further study. The Supplement to the 2012 SINSAA provided an updated evaluation that confirmed the feasibility of the BRT alternative.

Comment 11-7. There should be rail instead of BRT not only on Staten Island but also in all 5 boroughs. (Warren, Therency-Broadnax, Teixeira). The Mounth Loretto Spur, Travis Branch, North Shore Branch, South Shore Branch and the West Shore Line should be recommissioned to allow public passenger service, to reduce the amount of travel time spent on Express and Local buses, and to reduce emissions These additional 5 lines can either run 24/7 or end at a certain time. (Fahrt)

Response 11-7. As noted on p. 22 of the Draft Scoping Document, the 2012 SINSAA identified and evaluated eight alternatives representing a mix of transportation modes, including Heavy Rail along the Staten Island Railway, Diesel Light Rail, and Electric Light Rail. The alternatives were compared in terms of their ability to meet the goals and objectives of the study. The SINSAA concluded that the BRT Alternative had the potential to reduce travel time, improve transit access, and attract new riders while having a lower capital cost than the other alternatives.

Comment 11-8. Although there is support for the BRT, not linking it to the Hudson-Bergen Light Rail is a mistake and shortsighted. (Hyland)

Response 11-8. The purpose of the Proposed Project is to:

- Provide frequent, efficient, and reliable transit to serve growing demand on the North and West Shores of Staten Island.

-Facilitate improved connections between Staten Island neighborhoods and existing North and West Shore activity centers, industries, and employment centers.

-Offer a reliable and cost-effective transportation solution that supports adopted City and community-endorsed public policy initiatives. such as the North Shore 2030, pertaining to economic growth and development.

-Maximize transportation use of the former and currently unused North Shore Railroad right-of-way while minimizing property acquisition and disruption to the community and businesses.

Connections to the Hudson-Bergen Light Rail do not meet the purpose and need of the Proposed Project.

Comment 11-9. There is disapproval of the project; a better plan could be developed. (Gershenhorn)

Response 11-9. Comment noted.

Comment 11-10. In the Draft Scope, NYCT states that it will continue to explore BRT design options to avoid or minimize the potential impacts (e.g. parks, visual, wetlands, etc.) of the project. We note that any revisions to the proposed alignment would need to be reviewed for compliance with the New York City Zoning Resolution to confirm additional approvals to facilitate the Project.

DCP advises that the Draft Scope acknowledge these ongoing discussions and that the required city actions may change based upon finalizing the design of the BRT system.

Additionally, should any potential new City actions be identified that are substantively new or different from what was previously considered in the Draft Scope, a new scoping process may be required. (MOEC)

Response 11-10. Potential City approvals are listed on pages 34 and 35 of the Draft Scoping Document. MTA will continue to coordinate with the Department of City Planning (DCP) regarding refinements to the project design and any associated City approvals.

Comment 11-11. The City suggests that NYCT consider a project alignment that avoids alienation of parkland in front of Snug Harbor. (MOEC)

Response 11-11. Comment noted.

Comment 11-12. The EIS should reflect that the ROW would be placed in MTA Master Lease and not sold or transferred to the MTA. (MOEC)

Response 11-12. After extensive coordination, based on guidance provided by the City of New York, MTA and the City have agreed that the specific property transfer mechanism and ownership status of the right-of-way will be determined at a later date. This is

noted in the Potential City Approvals subsection of the Draft Scoping Document (p. 34).

Comment 11-13. The EIS should describe the mechanism for transferring or swapping ownership of those lots that are required as part of the realignment of the right of way for the activation of bus rapid transit, especially for those lots which are privately owned. (MOEC)

Response 11-13. The mechanism for the property transfers has not yet been identified. The EIS will describe the status of property transfer planning at the time of publication.

Comment 11-14. Recommending for the Construction Air Quality and Noise sections, that a quantitative analysis be conducted to discern if there may be any impacts to sensitive uses along the proposed ROW for the project. (MOEC)

Response 11-14. As indicated in the Construction Impacts section of the Draft Scoping Document, quantitative analysis may be warranted for air quality and noise if significant impacts to sensitive uses are anticipated. This determination cannot be made until further analysis has been completed as part of the EIS.

Comment 11-15. NYCT should provide more details for City map changes related to the streets, including but not limited to Roxbury Street and Richmond Terrace, and the purpose for review as well as drawings detailing the changes for review. NYCT should provide a complete list of locations requiring City map changes and details of those changes. (MOEC)

Response 11-15. Detailed information on potential City map changes has not yet been developed. Any potential discretionary actions required to facilitate the Proposed Project, including City map changes, would be undertaken by the City and determined at a later date.