

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

Comment Complete	Comment Category	Comment Subcategory	Comment	Comment Summary No.	Summary of Comment	Commenter ID	Comment ID	Sub.	Rel	Relevant DGEIS	Response to Comment	Notes
	Land	Surface Geology	5.2.1.1 Surface Geology - The USDA Soil Survey Map and accompanying description of the soils on the site indicate that there are highly erodible soils in the areas within and around Sub Area CW2. Page 5-20 of the DGEIS states that soil type LtB should "remain in some type of vegetation to reduce erosion," and that soil type LtC could "produce rapid stormwater runoff," and "should remain in vegetation as a protection against erosion." However, these are the exact same areas where new high density housing and development is being proposed. The DGEIS acknowledges this in one paragraph on page 5-23, where it explains that Sub Area CW2 contains the highest concentration of new development in the project while simultaneously containing the highest potential for soil erosion due to the soils and slope. The proposed mitigation related to developing Sub Area CW2 is vague (page 5-24) and generally mentions submission of grading, geotechnical and excavation plans for each Phase beyond Phase I. This is appropriate for a Generic Environmental Impact Statement, especially since CW2 is part of Phase IV. However, additional studies, including a possible supplemental EIS, may eventually be required for the CW2 Sub Area in order to adequately evaluate the actual development limitations in that Sub Area related to soils and slopes. Please also refer to the LEED standards related to slope preservation: http://www.usgbc.org/credits/ss53	63	The USDA Soil Survey Map and accompanying description of the soils on the site indicate that there are highly erodible soils in the areas within and around Sub Area CW2. However, additional studies, including a possible supplemental EIS, may eventually be required in order to adequately evaluate the actual development limitations related to soils and slopes	18	18AB	Y	Y	5.2	The in-situ soils in the CW2 Sub Area are highly erodible. Appropriate standard mitigation measures are outlined in the DGEIS which follow the SPDES General Construction requirements in New York State. Based on this information, it appears that soil stabilization in these soils can be performed with green and hardscape measures to mitigate adverse impacts. Nonetheless, these issues will be evaluated in detail at the Site Plan Review stage of development to ensure appropriate mitigation. This mitigation can include detailed grading plans, erosion and sediment control measures, the development of a Full SWPPP and geotechnical investigations/recommendations. A Supplemental EIS would only be required if appropriate mitigation cannot be implemented.	
	Water Resources	Stormwater	Please find below my comments on storm water management as outlined in the March 8, 2016 Chain Works dGEIS. Chapter 5.3.1.1 (page 5-27) Surface Water and Hydrogeological Setting. dGEIS Statement: A historical incident of flooding occurred in March 2011. The property of Jennifer Cleland, located on Spencer Street, experienced water flowing across her property during a prolonged, intense rain event. The on-site, unnamed tributary south of the developed portion of the Site (POS-E) had filled with stone and silt. This caused the unnamed tributary to overflow its banks and the runoff flowed to the base of the hill, crossing Ms. Cleland's property. The unnamed tributary was cleaned of all sediment on October 2011, and there have not been any additional incidents of flooding. This unnamed tributary receives surface water runoff from the Site and upstream properties including Ithaca College.	64	A historical incident of flooding occurred in March 2011. The property of Jennifer Cleland, located on Spencer Street, experienced water flowing across her property during a prolonged, intense rain event. The on-site, unnamed tributary south of the developed portion of the Site (POS-E) had filled with stone and silt. This caused the unnamed tributary to overflow its banks and the runoff flowed to the base of the hill, crossing Ms. Cleland's property.	8	8H	Y	Y	5.3	Acknowledged. This is documented in the Generic SWPPP as an existing condition. This Project provides an opportunity to improve maintenance of the unnamed stream that traverses the Site which in turn will reduce the chances of plugged drainageways causing flooding to downstream properties. All upstream and downstream stormwater facilities will be reviewed for capacity during the individual Site Plan Reviews. The proposed stormwater mitigation also includes a SWPPP for the entire site that requires ongoing Qualified Professional inspections/maintenance of all stormwater facilities.	Former 73
	Water Resources	Surface Water	The "unnamed" Class "2" Stream that runs through TM 123-3-1 traverses and drains CW-1 and CW-2, the CWD north of them, and probably a vast area of South Hill up to at least the King Rd. intersection. In major rain events where 3-5 inches fall within a short period of time, it has been the source of significant property damage to 333 Spencer Rd. for the past 36 years. On four occasions, from 1980 until 2000, the stream flow exceeded the capacity of the culvert at the bottom of our driveway and the stream blasted out of the stream bed, tossing boulders and 6" x 2' x 4' blocks of sandstone that form a retaining wall directing the flow south parallel to Spencer Rd. Extensive damage to the bottom of our drive made it impassable on two occasions until the City cleared the culvert and temporarily patched the drive with the dredged material.	64	The "unnamed" Class "2" Stream that traverses and drains CW-1 and CW-2 has been the source of significant property damage to 333 Spencer Rd. for the past 36 years. On four occasions, from 1980 until 2000, the stream flow exceeded the capacity of the existing culverts.	14	14A	Y	Y	5.3	Same as 64.	Former 73

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Water Resources	Stormwater	On October 13, 2013, I (Cynthia Brock) sent a letter to the City of Ithaca Planning Board with regard to the ongoing stormwater issues of the property impacting homes and properties downgradient at 333 Spencer Road, Ithaca. The letter stated: "I am requesting that the Planning & Development Board require, as a condition to be fulfilled prior to the approval of the subdivision, that the applicant install adequate and acceptable stormwater management systems in accordance with municipal standards, as allowed under NY GCT Law §33(2)(c). As an alternative to the requirement of the installation of adequate and acceptable stormwater management systems, prior to Planning and Development Board approval, a performance bond or other security sufficient to cover the full cost of the same, as estimated by the Planning & Development Board or department designated by the Planning & Development Board shall be furnished to the City of Ithaca by the applicant, as allowed under NY GCT Law §33(8)(a). Please see the below video of water flowing through the driveway of 333 Spencer Road. http://www.flickr.com/photos/56518850@N05/9723036039/ Over the past several years, 333 Spencer Road, the property immediately down gradient of the established stream/channel on Emerson's property, has been experiencing storm water runoff and property damage during high rain events as a consequence of storm water jumping the banks of the established swale on Emerson's property and redirecting onto 333 Spencer Road. The above photo was created by Scott Gibson, the City's Stormwater Management Officer, on 18 October 2013. Please also see the prior report produced by Scott Gibson and Ray Benjamin dated 5 October 2010, attached. Ongoing communication over the years between the property owners Cleland and Stundtner and Emerson Power Transmission, in addition to appeals to the City and the City's Board of Public Works (October and November 2010) have been unsuccessful in securing a remedy to 333 Spencer Road for the tremendous negative impact of storm water runoff. NYGCT Law §33 specifies that the before the approval of the Planning & Development Board, the Board shall require that the land be of such character that it can be safely used for building purposes without drainage or other menace to neighboring properties or the public health, safety and welfare. I respectfully request that the Planning & Development Board require, as a condition to be fulfilled prior to the approval of the subdivision, that the applicant install adequate and acceptable stormwater management systems in accordance with municipal standards, as allowed under NY GCT Law §33(2)(c).	65	The Planning & Development Board should require, as a condition to be fulfilled prior to the approval of the subdivision, that the applicant install adequate and acceptable stormwater management systems in accordance with municipal standards, as allowed under NY GCT Law §33(2)(c). As an alternative to the requirement of the installation of adequate and acceptable stormwater management systems, prior to Planning and Development Board approval, a performance bond or other security sufficient to cover the full cost of the same, as estimated by the Planning & Development Board or department designated by the Planning & Development Board shall be furnished to the City of Ithaca by the applicant, as allowed under NY GCT Law §33(8)(a).	8	8I	Y	Y	5.3	The Commenter references NY GCT Law §33 which pertains only to Subdivisions. The Project does not include a Subdivision action. However, the Project will follow all City and Town development regulations as part of the individual Site Plan approvals as required. The Project Sponsor will implement an "adequate and acceptable" stormwater management system in accordance with the current NYSDEC Stormwater Management Design Manual at the time of submission of the Site Plan application for an individual phase. Even though performance bonding is not required, the associated NYSDEC SPDES permit requires implementation. The SPDES permit has adequate enforcement measures as outlined in the NYSDEC SPDES General Permit for Stormwater Discharges (GP-0-15-002).	May combine with 64.
	Water Resources	Stormwater	Since 2000, there have been three more storm occasions when the stream jumped its bed within the CWD. This sent 3-4 inches of flow through the property immediately south of us then topography turned it back north into our property flowing down our driveway. The short video at https://www.flickr.com/photos/56518850@N05/albums/72157635484257160 shows the flow well after the storm had passed and does not represent max flow. There is a second video showing the condition at the culvert under the old rail ROW much later. This is caused by large quarried blocks of stone that form the southern edge of the existing artificial hillside of the developed portion of the CWD sliding into and diverting the stream flow. Under normal circumstances this doesn't manifest itself downhill. This nuisance may be considered public and/or private. The matter was brought to the attention of the Emerson facilities staff and we met onsite to review it. They were noncommittal with next steps. At an early CWD public meeting, we learned that Emerson claimed to have corrected the issue. Their remediation consisted of moving relatively light material to the southern edge of the stream bed to build it up. There hasn't been a recent rain event to test the effort. Material continues to accumulate and some diversion may still be occurring, just not at a rate to be noticed downstream. The culvert is currently half plugged and there is evidence that the stream is flowing across the ROW and eroding the concrete culvert. The stream bed immediately below the culvert is packed with some of the quarried blocks and it's starting to divert flow in our yard. We would like to see this nuisance more convincingly remediated and requirements for ongoing inspection and maintenance made as a condition in the FEIS.	64	Same as 64.	14	14C	Y	Y	5.3	Same as 64. This Commenter specifically requests "like to see this nuisance more convincingly remediated and requirements for ongoing inspection and maintenance made as a condition in the FEIS". Inspection and maintenance is required by the SPDES General Construction Permit.	Former 74.
	Water Resources	Stormwater	Potential mitigation: limit the amount of land cleared at one time due to steep slope and potential for erosion and stormwater runoff during construction.	65	Limit the amount of land cleared at one time due to steep slope and potential for erosion and stormwater runoff during construction.	1	1S	Y	Y	5.3	NYSDEC SPDES General Construction Permit (GP-0-15-002) limits disturbance areas to less than 5 acres at any time unless prior approval from the MS4. The MS4 can require additional mitigation and inspections by a Qualified Professional (Part II.C.3).	Former 75
	Water Resources	Stormwater	I have lived at 411 Spencer Road for 22 years, and experience a flood of water a score of years ago. My side yards, the basement, my neighbor's home looked like Buttermilk Falls. Being that Stone Quarry Road is in my backyard and the Chain Works is up and beyond, I have always wondered where the water came from.	66	Same.	16	16B	Y	Y	5.3	The generic SWPPP outlined in the DGEIS provides tributary mapping. See response to Comment 64.	Former 76
	Water Resources	Stormwater	Do significant precipitation events which occur during Phase I activities such as excavation, filling, compacting, have the potential to change Site hydrology/hydrogeology?	67	Same.	18	18F	Y	Y	5.3	Yes. That is the rationale for the development of a SWPPP in accordance with the SPDES General Construction Permit (GP-0-15-002) and the NYS Stormwater Design Manual.	Former 77
	Water Resources	Stormwater	5.8.1.3 Stormwater Infrastructure Stormwater from the new development at area CW-2 is shown to run through POS E (full description in Appendix E). Given the topology of the site, the new building runoff would drain directly to the existing railroad bed, thereby bypassing POS E. The developer will need to submit a grading plan showing the method used to get runoff to POS E.	68	Same.	18	18AS	Y	Y	5.3	Noted. The Project Sponsor will be required to submit a detailed grading plan as part of the Site Plan Review process.	Former 78

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Water Resources	Stormwater	The narrative calls for runoff reduction for the new impervious areas caused by new buildings, parking and drives via green roofs on the new buildings. Reducing water runoff by using green roofs is a best management practice. However, the way the DGEIS is written seems to imply that the proposed methods will reduce the water quantity coming off of a parking lot via a green roof, which is counterintuitive and inaccurate. Please clarify this. Overall, the proposed water quantity and quality methods will need further review when the full SWPPP is done for this project.	69	The way the DGEIS is written seems to imply that the proposed methods will reduce the water quantity coming off of a parking lot via a green roof, which is counterintuitive and inaccurate. Overall, the proposed water quantity and quality methods will need further review when the full SWPPP is done for this project.	18	18AT	Y	Y	5.3	Runoff Reduction techniques as outlined in Chapter 3 of the NYS Stormwater Management Design Manual examines impervious surfaces as a whole within a drainage subarea that includes both building and pavement areas. Runoff Reduction manage the impacts by using natural features and practices to slow down the runoff, promote infiltration and evapotranspiration, and consequently minimizing the need for the structural "end-of-pipe" practices. Mitigation will utilize multiple stormwater mitigation measures in accordance with NYS and City/Town regulations. Final design of the stormwater quality/quantity mitigation will be performed during the Site Plan review process to ensure post-development impacts to the pre-development condition.	Former 79
	Water Resources	Stormwater	Finally, we recommend that the FEIS include Ongoing Project Site Maintenance of impacts originating from the CWD such as storm water impacts and trash.	70	Same.	14	14H	Y	Y	5.3	This is a requirement of the NYSDEC SPDES General Construction Permit (GP-0-15-002) and is a typical Site Plan Approval condition. Part VII.L of GP-0-15-002 requires the Property Owner to, at all times, "properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the owner or operator to achieve compliance with the conditions of this permit and with the requirements of the SWPPP".	Former 68
	Water Resources	Surface Water	A 50' setback is proposed from all streams. It would make more sense to base the setback requirements and treatments on the topography. Site disturbance uphill from a streambank will require a different mitigation than site disturbance downhill from a streambank.	71	Same.	1	1AH	Y	Y	5.3	The DGEIS takes a conservative approach by requiring a large 50' stream setbacks for the downhill and the uphill development.	Former 80
	Water Resources	Surface Water	Existing water resources should be more closely evaluated for each phase of the project. Particularly for the presence of wetlands and perched water tables.	72	Same.	1	1AI	Y	Y	5.3	The Project Site as a whole has been examined for wetlands with none found within the developable areas. During the individual Site Plan applications, the existing conditions within the individual Site Plan areas will be reexamined as a whole which will include or wetlands and perched water tables.	Former 81
	Vegetation and Fauna	Existing Conditions	5.4 Vegetation and Fauna - The DGEIS contains a very thorough biological study of the area's flora and fauna. Although the project includes tree removal, the DGEIS indicates preserving the most intact and valuable forested area, where the Appalachian Oak-Hickory forest is located (CW1). The DGEIS also contains a tree survey and preservation plans for CW2 (p. 5-41), the area that is currently undeveloped. Overall, the biological study appears to be complete and the proposed mitigation for areas with the most tree removal appears to be adequate.	73	Overall, the biological study appears to be complete and the proposed mitigation for areas with the most tree removal appears to be adequate.	18	18AC	N	Y	5.4	Acknowledged.	Former 82
	Vegetation and Fauna	Native Species	I've lived on that property at 333 since 1980. I've seen a lot of change in the ecology of our two and a half acres. Deer have a pretty substantial impact on it. I've had deer shot in my yard in the city limits. I've had deer hit by cars and land in the creek bed. I've had to have city police come over and shoot wounded deer in the yard. Like oh, my God, I've never been this close to a deer before, boom. So the notion that developing that south end is going to have some impact with the deer, the deer moving around. Good Lord the deer have decimated the hillside as it is, the ecology of the hillside. Anything of native species in my yard, the small things, shrubs, small plants, all gone. Deer browse them away. So I think that is an understated impact.	74	The impact to the native deer population is understated.	5	5C	Y	Y	5.4	The DGEIS Scoping does not include an analysis of impacts to the native deer population, however this comment is acknowledged since any development of a greenfield will impact and displace native species. This will be mitigated by retaining significant portions of the Site in a native state including the 23.9 acre CW1 Sub Area.	Former 83
	Historic and Archaeological Resources	Historic Structures	Pg 5-65: There is reference to architectural guidelines in the Design Standards to protect historic character	75	Same.	1	1AU	Y	Y	5.6	No architectural guidelines are included as part of the project. Design Standards address building form and disposition and relationship to the pedestrian experience but do not cover subjective aesthetic or stylistic elements of the buildings. These will be addressed by the appropriate Planning Board during Site Plan Review.	Former 84
	Utilities	Public Water	5.8.1.1 Water Supply In figure 5.8-1, the existing water main that crosses the site from east to west to the railroad bed is 12 inches in diameter, not 8 inches as shown in the figure.	76	Same.	18	18AP	Y	Y	5.8	Figure 5.8-1 in the DGEIS has been revised accordingly.	Former 85 REVISED Fig 5.8-1
	Utilities	Public Water	All water mains should be looped and contain as few dead ends in the system as possible.	77	Same.	18	18AQ	Y	Y	5.8	Noted. The final design of all utilities will be addressed during Site Plan review.	Former 86
	Public Health and Environment	Sanitary Sewer	During the 1980's, a faulty sanitary line that runs parallel to Rt. 96B would leak raw sewage into the stream whenever there was a thunder storm. We are concerned that this same sanitary line served as a means of conducting contamination from the old NCR site. It's hard to believe that NCR was any more responsible with its use of hazardous materials than subsequent industrial owners of the proposed CWD.		The sanitary sewer main that parallels NYS Route 96B leaked during the 1980s. There is a concern that this caused contamination.	14	14B	Y	Y	5.5		Former 87 / Move to Public Health
	Utilities	Sanitary Sewer	5.8.1.2 Sanitary Sewers Housing in area CW-2 is downhill from the existing sanitary sewer service. The sanitary sewer for this housing area would need to be pumped uphill to the existing gravity sewer. If the proposal involves multiple owners (e.g. HOA), then the developer will need to set up a Sewage Works Corporation for maintenance of these facilities.	78	Same.	18	18AR	Y	Y	5.8	Noted. The final design of all utilities will be addressed during Site Plan review.	Former 88

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Utilities	Sustainable Design	You have a goal of 70% fossil fuel reduction. What is this a reduction from? How will it be monitored?	79	Same.	1	1X	Y	Y	5.8	Architecture 2030 states that all new buildings, developments and major renovations shall be designed to meet a fossil fuel, GHG-emitting, energy consumption performance standard of 70% below the regional (or country) average/median for that building type. The 70% fossil fuel reduction referenced in the DGEIS is compared to conventional buildings of the same quantity and type at this time. This can be achieved in many ways including more reliance of on/off-site renewable energy, higher efficiency MEP systems and/or building envelope improvements. The DGEIS and the Conceptual Site Layout Plan is conducive to allowing the integration of renewable energy systems as outlined in the Architecture 2030 Challenge with a goal of a 70% reduction of fossil fuel usage as stated in Section 2.6.3. This strategy exceeds the NYS Energy Conservation Construction Code and the goals set forth in the DGEIS are in alignment with the Tompkins County Energy Roadmap goals.	Former 89
	Utilities	Sustainable Design	Energy: The Tompkins County Energy Roadmap (http://www.tompkinscountyny.gov/planning/energy-climate) states that in order to achieve the community's stated GHG emissions goal of an 80% reduction in emissions from 2008 levels by 2050, it is critical to reduce energy demand in buildings. The Roadmap calls for constructing new buildings that are extremely energy efficient, aiming for a 70% reduction in energy use compared to the national median for comparable buildings, and increasing to net zero carbon emissions between 2030 and 2050. The Roadmap also calls for achieving a 35% reduction in energy use in existing buildings through retrofits and upgrades. This DGEIS should consider mitigation strategies that far exceed NYS Energy Conservation Construction Code standards for insulation and air sealing.	79	The DGEIS should consider mitigation strategies that exceed NYS Energy Conservation Construction Code standards so that the Tompkins County Energy Roadmap goals for 2050 are met.	17	17I	Y	Y	5.8	Same as 79.	Former 90
	Utilities	Sustainable Design	This DGEIS should also consider mitigation strategies to allow more integration of renewable energy systems. As an example, a mitigation strategy could be to take advantage of passive solar gain in building orientation, include south-facing roofs that can host solar PV systems on all buildings, and develop building infrastructure on both new and renovated buildings in such a way as to minimize the roof area occupied by HV AC systems and maximize the capacity to install rooftop solar panels.	79	The DGEIS should also consider mitigation strategies to allow more integration of renewable energy systems.	17	17J	Y	Y	5.8	Same as 79.	Former 90
	Water Resources	Stormwater	The document states that the extent and details of the stormwater facilities on site are not completely known or understood. When will we know the extent of the stormwater system and how stormwater can be management be evaluated without this knowledge.	80	Same.	1	1AG	Y	Y	5.8	The conceptual stormwater management plan for the entire Project Site is outlined in the DGEIS. Final stormwater management designs and a SWPPP based on the conceptual plan will be addressed during the Site Plan review process.	Former 91
	Community Services	Educational Facilities	Correspondence with ICSD states that the project will have 50-100 school aged children. The capacity analysis only accounts for 50. Correspondence with ICSD indicated that planning would be necessary to accommodate 50 children in some situations. The document does not address how a potential influx of children would be facilitated/planned with ICSD.	81	Correspondence with ICSD indicated that planning would be necessary to accommodate 50 children in some situations. The document does not address how a potential influx of children would be facilitated/planned with ICSD.	1	1AW	Y	Y	5.11	The planning necessary to receive the additional school-aged children is the responsibility of ICSD. The purpose of the GEIS is to insure that the ICSD will not be negatively impacted by CWD. The number of students were estimated by the Project Sponsor based on the anticipated Site Program. Additional State Aid and the related ad valorem associated with the development will provide the financial means for ICSD to implement facility planning, if it is deemed necessary by the District. Coordination with ICSD, an Interested Agency to the Project, is ongoing. Updates on the Site Program will be sent to the ICSD during Site Plan Review of the individual Phases.	Former 63
	Community Services	Educational Facilities	Does the school tax revenue take into account the STAR Rebate?	82	Same.	1	1AX	Y	Y	5.11	The Applicant understands that the STAR Rebate provides property tax relief. Residents are eligible for STAR if they own their own house as a primary residence and have a combined income of less than or equal to \$500,000. The Chain Works District DGEIS makes no mention of the STAR Rebate and how it would affect tax revenue. For those that qualify for STAR property tax relief, they would receive a STAR credit in the form of a check, rather than receiving a property tax exemption. The dollar value of the credit will be the same as the property tax exemption. Because the household receives a STAR credit, property tax revenue for the school system should remain the same.	Former 64

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Community Services	Educational Facilities	(5 Page 5-217; 6 Page 5-218) Chapter 5.11.1.3 (page 5-217) Educational Facilities. dGEIS Statement: South Hill Elementary School currently has 322 students enrolled in Pre-K to 5th grade with approximately 80 teachers and staff. The average class size at South Hill Elementary School is 18 students with a teacher / student ratio of 1:11. South Hill Elementary School's current estimated capacity is 385 students.5 ... Boynton Middle School currently has 555 students enrolled in 6th to 8th grades with approximately 90 teachers and staff. The average class size at Boynton Middle School is 21 students, with a teacher / student ratio of 1:9. Boynton Middle School's current estimated capacity is 600 Students. Ithaca High School currently has 1,362 students enrolled in 9th to 12th grades with approximately 109 teachers. The average class size at Ithaca High School is 21 students with a teacher / student ratio of: 1:10. Ithaca High School's current estimated capacity is 1500 students.6 Comment: The addition of 119 elementary school students would be a 37% increase over the current population of SHES and would exceed the school's capacity by 56, having a dramatic effect and likely resulting either in the need to enlarge the school or redistrict student catchment areas. This impact on ICSD should be stated and explored with input from ICSD administrators. To my knowledge no such discussion has yet occurred.	83	The Commenter disagrees with the DGEIS estimate for school age children and provides their own estimate that the CWD will create a demand of 119 elementary school students. Further discussion on existing school population and potential impact based on the Commenter's estimate should be stated and discussed with ICSD.	8	80	Y	Y	5.11	The comment is acknowledged. See response to Comment 81.	Former 65
	Community Services	Public Safety	It would be helpful to know the cost of full time police officers	84	Same.	1	1AY	Y	Y	5.11	According to Officer Jamie Williamson, in 2011, the last year the City of Ithaca and the Ithaca PBA had a contract, the base salary for a police officer at the Ithaca Police Department \$70,000. The benefit package for each police officer costs the City of Ithaca an additional \$49,000 dollars. With those two amount combined, each police officer costs the City of Ithaca about \$119,000. The Ithaca Police Department has 66 sworn officers. According to Undersheriff Brian Robison, the Sheriff's Office has a current contract ending at the end of the year, December 31st, 2016. The salary for a work rate deputy is \$65,000 plus fringe benefits . The Tompkins County Sheriff's Office has 27 full time deputies.	Former 66
	Site Program	Recreation	Chapter 4.7 (sic) Impact on Open Space and Recreation a. Description of Gateway Trail and connection to existing and future trail network – Please include potential connections to the trail through the T1 (natural zone). It is often mentioned that this area would contain walking trails, and it is logical that individuals would desire to connect between the T4 developments (pg 18) and the Gateway trail to get to area south such as Stone Quarry and Buttermilk Falls.	85	Please provide trail connections through the CW1 Zone.	8	8S	Y	Y	5.12	Acknowledged. See Revised Figure ** that depicts conceptual locations for recreational areas. The actual design of the recreation/public amenity areas will be developed during the Site Plan approval process for the individual Phases.	Former 67
	Construction	Mitigation	There's going to be fugitive dust problems.	86	Same.	7	7B	Y	Y	5.13	See Response to 70. Mitigation for construction dust is governed by the required NYSDEC SPDES Permit for General Construction (GP-0-15-002). This includes developing a Full SWPPP for each individual Phase that requires dust control, temporary soil cover, erosion blankets and other standard BMPs. Also, a Monitoring Plan will be developed as required by NYSDEC as part of the RI.	Former 68
	Construction	Mitigation	Where is the cut & fill analysis for Phase 1?	87	Same.	1	1AE	Y	Y	5.13	See Figure 5.2-3 in Section 5.2.2 of the DGEIS for the cut & fill analysis for the entire site based on the Conceptual Site Layout Plan. Each Site Plan review package will include a cut & fill analysis as part of the design of each individual Phase and will be reviewed by the applicable Planning Board at that time to ensure no adverse impacts that are not addressed in the GEIS.	Former 69
	Construction	Mitigation	Blasting may be required in certain areas. Therefore it would make sense to outline the environmental impacts and mitigations to prevent reopening on the env review later.	88	Same.	1	1AF	Y	Y	5.13	Section 5.2.3 of the DGEIS outlines standard mitigation if controlled blasting is required.	Former 70
	Construction	Mitigation	We recommend that the FEIS include a means to mitigate community impacts during construction.	89	Same.	14	14G	Y	Y	5.13	Section 5.13.3 of the DGEIS delineates mitigation measures for construction impacts to the community.	Former 71
	SEQR	DGEIS Format	Scoping document chapter 9 (DGEIS chapter 8): The chapter in the DGEIS does not line up structurally with the list in the scoping document (pp. 60-61), which seriously hinders checking for adequacy. But in general, it can be said that the entire chapter reads more like an advertisement than a formal description.	90	The format of the Scoping Document is different than the DGEIS making it harder to review. Chapter 8 of the DGEIS reads like an advertisement.	2	2F	N	Y	8	During the development of the DGEIS, the Project Team changed the structure of this Chapter based on comments by City/Town Staff however all of the content listed in the Scoping Document is covered in the DGEIS. Chapter 8 specifically focuses on the how the investment in the Project impacts growth and the community character. This Chapter outlines how this Project aligns with many of the planning initiatives outlined in City/Town documents such as the Comprehensive Plans.	Former 92
	Growth Inducing Aspects	Tax Base	Another requirement is to "Discuss the growth in economic activity from both tourism and property value increases." There is a discussion of property value increase in the section referred to (8.2), but it's not netted out in a figure for the actual tax revenues on the re-assessed property, and there is no attempt at all to gauge the effects of an increase in tourism (if any).	91	The property value increase is not netted out in a figure for the actual tax revenues on the re-assessed property.	2	2H-1	N	N	8.2	From Scoping: "The Project would provide jobs, economic stimulus and tourism. These impacts will be estimated based on the Project's anticipated construction cost and employment." The existing assessment on the property is \$3,500,000. After full development the assessment of the property is estimated at \$236,000,000 by the County Assessor. The ultimate assessment is determined by the Assessor and the tax rate is set by the individual municipality/district. The tax revenue, as estimated with 2016 data, from the re-assessed property value will be \$4.3M for the Ithaca City School District (DGEIS Table 5.11-4), \$1.55M for the Town of Ithaca and \$2.39M for the City of Ithaca (DGEIS Table 5.11-2). All estimates are based on the Conceptual Site Payout Plan presented in the DGEIS as well as current tax rates.	Former 93

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Growth Inducing Aspects	Tax Base	Another requirement is to "Discuss the growth in economic activity from both tourism and property value increases." There is a discussion of property value increase in the section referred to (8.2), but it's not netted out in a figure for the actual tax revenues on the re-assessed property, and there is no attempt at all to gauge the effects of an increase in tourism (if any).	91	The property value increase is not netted out in a figure for the actual tax revenues on the re-assessed property.	18	18BA-1	Y	Y	8.2	Repeat of 2H-1. See Response to 91.	Former 93
	Growth Inducing Aspects	Tourism	Another requirement is to "Discuss the growth in economic activity from both tourism and property value increases." There is a discussion of property value increase in the section referred to (8.2), but it's not netted out in a figure for the actual tax revenues on the re-assessed property, and there is no attempt at all to gauge the effects of an increase in tourism (if any).	92	There is no attempt at all to gauge the effects of an increase in tourism (if any).	2	2H-2	N	N	8.2	It is not anticipated that the Chain Works District will be a large tourism generator. For example, no destination type attractions are included in the Conceptual Site Layout Plan.	Former 94
	Growth Inducing Aspects	Tourism	Another requirement is to "Discuss the growth in economic activity from both tourism and property value increases." There is a discussion of property value increase in the section referred to (8.2), but it's not netted out in a figure for the actual tax revenues on the re-assessed property, and there is no attempt at all to gauge the effects of an increase in tourism (if any).	92	There is no attempt at all to gauge the effects of an increase in tourism (if any).	18	18BA-2	N	N	8.2	Repeat of 2H-2. See Response to 92.	Former 94
	Character of Community	Housing Market Study	Depth of Information Presented Diversity of housing unit types and pricing (first bullet point): This entire point is addressed in just three paragraphs in Section 8.3. It is stated that the project will include "units averaging 2 bedrooms, with a range from studios to 3 bedrooms" and are described as being located in "double loaded corridor apartment buildings", "loft and penthouse units in the historic buildings" and "townhouses". However, there is no attempt made to provide, as required, the projected number or percentage of the proposed 900+ residential units that will fall into each of these size and type categories. The only pricing information presented is for an "average 2 bedroom unit" projected to be "around \$2,370" which would "be affordable for households with a combined income of \$94,800". No pricing data is projected for the studio, 1 bedroom or 3 bedroom units nor is there any information provided concerning the expected pricing differentials across the various housing types.	93	There is no attempt made to provide, as required, the projected number or percentage of the proposed 900+ residential units that will fall into each of size and type categories or associated pricing	18	18BD	Y	Y	8.3	Of the proposed 915 units, it is anticipated that approximately 7% will be studio units, 55% one-bedroom units, 20% two-bedroom units, 3% three-bedroom units and 15% townhouse units. These are based on preliminary conceptual studies of the existing and proposed new development and subject to change as the Project is developed over its anticipated 7-10 year timeframe. The actual distribution of constructed unit types will be determined by market-driven needs at the time of design and during the Site Plan approval process phase. As indicated in Section 8.3, The average 2 bedroom unit is expected to rent for around \$2,370 based on the current market for similar units.	Former 96
	Character of Community	Housing Market Study	Market demand and need, comparison (second bullet point): Section 8.3 (DGEIS) presents a number of facts and figures relating to various aspects of the "existing housing market". However, this data is not consistent or cohesive and does not fulfill the requirement for an "evaluation of existing market demand". To begin with, the applicant does not specifically define the geographic boundaries of the housing market that may be impacted. At various times the market area is referred to as the "City of Ithaca", the "Town" (of Ithaca), "Tompkins County" and the "Ithaca Metropolitan Statistical Area". These are, indeed, very different units of geography across a range of variables. Without a well-defined, agreed upon definition of what constitutes the physical extent of the existing housing market, there is no valid basis on which to "evaluate" market demand nor can there be any valid "comparison to the proposed housing portion of the Project", both of which are required by the final Scoping Document. In addition, a robust discussion of this topic would also include the identification and description of specific consumer markets which the project is intending to target. Targeting allows for breaking the general population within the larger housing market into smaller demographic segments that differ across a number of economic, social and behavioral dimensions, thus providing a more solid basis on which to "evaluate existing market demand". Although there is some vague mention of targeting (e.g. "a wide spectrum of demographics", "senior population", "market for luxury, upscale and moderate/affordable new rental units") none of these are addressed in any depth and there is no attempt to tie them specifically to "existing market demand and need" as it relates to the proposed project.	94	The Project Sponsor does not identify the geographic boundary of the housing market study nor specific consumer market demographic.	18	18BE	Y	Y	8.3	The purpose of the GEIS is to address broad planning questions and long-term, cumulative environmental impacts from the development of the Project. The market study data is provided in this context to generally assess local conditions. The DGEIS presents information about existing housing stock, vacancy rates and the positive impact of the proposed 915 dwelling units to the existing housing shortage in the Ithaca area. The DGEIS references the Downtown Ithaca Alliance's 2012 study performed by the Danter Company which concludes that there is a demand for over 1,350 unit in the downtown Ithaca area. Tompkins County is in the process of drafting the Tompkins County Housing Needs Assessment. When this assessment is finalized and as other housing studies are performed, the Planning Boards will reference the most up to date studies during the Site Plan review.	Former 97
	Character of Community	Housing Market Study	No inclusion of primary data. Housing market analysis, including the impacts of gentrification, is a highly complex undertaking, especially for a project of this size. Relying solely on secondary data sources (some of which are quite dated) seems inadequate to address this important and multi-faceted subject matter. See the 49+ page Transportation and Circulation, Appendix I of the DGEIS for an example of the appropriate inclusion of primary data collected by an expert consultant and used to identify potential impacts and suggested mitigation.	94	No inclusion of primary data for the housing market analysis.	3	3G	N	N	8.3	Same as 94.	Former 97

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Character of Community	Housing Market Study	No inclusion of primary data. Housing market analysis, including the impacts of gentrification, is a highly complex undertaking, especially for a project of this size. Relying solely on secondary data sources (some of which are quite dated) seems inadequate to address this important and multi-faceted subject matter. See the 49+ page Transportation and Circulation, Appendix I of the DGEIS for an example of the appropriate inclusion of primary data collected by an expert consultant and used to identify potential impacts and suggested mitigation.	94	No inclusion of primary data for the housing market analysis.	18	18BI	Y	Y	8.3	Same as 94.	Former 97. This is a Repeat Comment - 3G.
	Growth Inducing Aspects	Housing Market Study	(1 Page 2-36; 2 Page 8-3; 3 Page 8-4) Comment on population demographics. Chapter 2.7.7 (page 2-36) Anticipated Project Population. dGEIS Statement: Project will construct approx. 1,830 bedrooms or 915 units, and estimates a population of 1,830.1 Chapter 8.3 (page 8-3) Population Demographics. dGEIS Statement: The Project Sponsor plans to include units averaging 2 bedrooms, with a range from studios to 3 bedrooms. The average 2 bedroom unit is expected to rent for around \$2,370 based on the current market for similar units. At this price, units would be affordable for households with a combined income of \$94,800. Most households are expected to be one or two people based on the unit mix.2 ... Based on an assumed 1.75 adult residents per housing unit, the Project will house more people than it employs.3 Comment: No rationale or reference is provided as to how these inconsistent estimates were identified,	95	In Section 2.7.7 the anticipated population is 1,830 for the 915 dwelling units and Section 8.3 estimates 1.75 adults resident per dwelling unit. No reference is provided to the inconsistent estimates.	8	8L	Y	Y	8.3	Acknowledged. Section 8.3 of the DGEIS will be revised to match the total anticipated residential population of 1,830.	Former 98
	Growth Inducing Aspects	Housing Market Study	The Rutgers report proposes that in full build out, the project will house approximately 2,114 individuals, with 174 pre-school aged children, 119 elementary aged children, 46 middle school aged children and 37 high school aged children, with the numbers increasing as rents decline. Approximately 238 individuals will be of retirement age. The current City resident population of South Hill is approximately 2,100 residents, which is about the same population as the new development, and impacts on this neighborhood should be clearly spelled out and how these impacts will be mitigated. No proposed mitigations are detailed with regards to the cultural, social or recreational needs of its residents in terms of playgrounds, community centers, safe spaces to run or play games, specific social and recreational needs of seniors, or amenities for the needs of the very young or elderly. In my experience on City Council, our existing municipal recreational programs for youth fall short of meeting demands in both available resources, physical space and funding, and mitigating the needs of the new youth and senior population should be more fully developed than what is provided in the dGEIS.	96	The Rutgers Study cited by the Commenter presents their own estimate of population and believes that the existing municipal recreational programs for youth/seniors fall short of meeting demands in available resources, physical space and funding.	8	8N	Y	Y	8.3	The population estimate set forth in the DGEIS was developed based on the Site Program. The site will be programmed for such uses as outdoor markets, gatherings, festivals, community events, maker / artist spaces, galleries, and other uses, in partnership with engaged cultural organizations. The Chain Works District will provide the opportunity for community groups that serve a diverse population to develop specific social, cultural, and recreational programs to meet their specific needs. Potential partners in programming these spaces might be such groups as the Ithaca Youth Bureau, the YMCA, Cornell Cooperative Extension, Sciencenter, Tompkins County Public Library, Community School of Music and Arts, Greater Ithaca Activity Center, the Ithaca Children's Garden, Lifelong, Office for the Aging, Southside Community Center, Northside Community Center, Ithaca Generator, as well as potential partnerships with local colleges and universities. As the Project comes online, these issues will be reassessed during the Site Plan review to ensure that no adverse impacts have not been addressed in the GEIS.	Former 98

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Character of Community	Gentrification	<p>8.3 & 8.4 Population/Demographics and Gentrification The following comments were submitted as part of the DGEIS Adequacy review process and did not receive a response (other than that the comments were not related to Adequacy): The Chain Works District proposal includes construction of 900+ residential units described as "market rate housing opportunities". Approximately half are slated to be located in the City of Ithaca and the remainder in the Town of Ithaca. It seems reasonable to speculate that the addition of such a large number of high-end residences to the existing housing stock of both municipalities is likely to result in a number of potential environmental impacts, both positive and negative. The applicant was instructed in the Final Scoping Document, Chapter 9: Growth Inducing Aspects and Character of Community, pages 60-61 to include in the DGEIS discussion of a number of specific potential impacts relating to housing, thus establishing the breadth of information required (bolding added): Discuss the diversity of housing unit types as well as pricing. This will include an estimate of the number of each housing type and size., Evaluate existing market demand and need with a comparison to the proposed housing portion of the Project, Discuss the gentrification of urban areas and the impacts to the City and Town with a concentration on the scale of the development and tax revenues. Each of the topics above was at least mentioned in the DGEIS, Chapter 8: Growth Inducing Aspects and Character of Community, in either Section 8.3: Population/Demographics or Section 8.4: Gentrification. However, given that these two sections together amount to approximately 2 pages in length, it is our opinion that none of the above points have been adequately addressed in terms of both the depth and type/source of information presented. Without data drawn from a wider range of sources that can serve as the basis for a more in-depth analysis of this complex set of issues, we feel strongly that readers of the DGEIS do not have adequate information to make informed decisions about these important components of the environmental analysis. Clarifying comments are as follows:</p>	97	The DGEIS does not have adequate detail to address existing market demand, the potential impacts of the proposed housing portion of the Project and gentrification of urban areas.	18	18BC	Y	Y	8.4	<p>The purpose of a GEIS is to address broad planning questions. See Comment Response 93 and 94 for the response to the existing market demand and the potential impacts of the proposed housing portion of the Project. The DGEIS cites the 2012 DIA Housing Market Demand Study which documents a need for up to 1,350 units in the downtown area. The proposed 915 dwelling units in CWD will assist in meeting the demand.</p> <p>As to the third part of the Comment, gentrification is defined generally as the arrival of wealthier people in an existing urban residential district which includes a related increase in rents and property values. This in turn changes the district's character and culture. The term is often used negatively, suggesting the displacement of poor communities by rich outsiders. The DGEIS finds that the proposed project does not displace any residents therefore on-site gentrification will not occur.</p> <p>Gentrification generally occurs in areas where commercial and residential land is cheap relative to other areas within the City. A review of recently sold properties indicate the transactions within the South Hill area are similar if not slightly higher than the average sales price in other residential areas of the City. For example, there are two single-family residential properties currently listed for sale in the immediate vicinity of the Project site at \$297,000 and \$299,000. There are three comparable properties for sale on W. Green and W. Clinton Streets (Near NYS 34) for \$152,000, \$163,000 and \$199,000. Therefore this area of the City/Town does not lend itself to gentrification.</p> <p>The proposed Project will improve the overall neighborhood but it is not anticipated to have large impacts to the overall tax assessments to the adjacent parcels. In fact, the added tax base should help stabilize City, Town, School District and other associated tax districts by increasing the tax base by an estimated \$232,500,000 according to the County Assessor (DGEIS Table 5.11-4).</p> <p>As outlined in the SEQR Handbook, the DGEIS demonstrates how the proposed action is capable of serving a public use, benefit, or purpose. Specifically answering the Comment, the proposed project provides additional housing to reduce gentrification pressures on other areas of the community and provides increased tax revenues through additions to the local taxable base and fulfillment of shopping.</p>	Former 99
	Character of Community	Gentrification	<p>Gentrification and impacts (third bullet point): While we agree that gentrification is a "difficult phenomenon to measure", this does not exempt the applicant from presenting a more in-depth analysis than the one page that is currently offered. A vast cross-disciplinary literature concerning gentrification currently exists, spanning many decades. None of this literature is referenced in Section 8.4 (DGEIS) where the subject is discussed. While a reasonable definition of gentrification is presented as the basis for the discussion, of the three "metrics" contained within it, only one, "rising housing prices", is significantly addressed. The remaining two are briefly mentioned but only as they relate to current conditions in the City of Ithaca. One of these metrics, "displacement of people from longstanding communities" is, in fact, implied to be irrelevant in this case because, "...converting an area that is not residential into a new neighborhood, is by definition not resulting in the displacement of existing households, one of the key factors in gentrification". The Town of Ithaca, and specifically the South Hill neighborhood, which is very vulnerable to the possibility of gentrification as a result of the residential portion of the proposed project, is barely mentioned.</p>	97	While gentrification is a "difficult phenomenon to measure", this does not exempt the Project Sponsor from presenting a more in-depth analysis than the one page that is currently offered.	18	18BF	Y	Y	8.4	Same as 97.	Former 99

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Character of Community	Gentrification	(Item #3 in 3B) While I agree that gentrification is a "difficult phenomenon to measure", this does not exempt the applicant from presenting a more in-depth analysis than the one page that is currently offered. A vast cross-disciplinary literature concerning gentrification currently exists, spanning many decades. None of this literature is referenced in Section 8.4 (DGEIS) where the subject is discussed. While a reasonable definition of gentrification is presented as the basis for the discussion, of the three "metrics" contained within it, only one, "rising housing prices", is significantly addressed. The remaining two are briefly mentioned but only as they relate to current conditions in the City of Ithaca. One of these metrics, "displacement of people from longstanding communities" is, in fact, implied to be irrelevant in this case because, "...converting an area that is not residential into a new neighborhood, is by definition not resulting in the displacement of existing households, one of the key factors in gentrification". The Town of Ithaca, and specifically the South Hill neighborhood, which is very vulnerable to the possibility of gentrification as a result of the residential portion of the proposed project, is barely mentioned. The final paragraph of Section 8 (DGEIS) states that, "While the Project does not plan to include any below market rate housing, the additional supply of units allowed under the proposed zoning action can be expected to help slow, reduce, or prevent gentrification in the surrounding neighborhoods by increasing the City's limited housing supply (emphasis added)." This is particularly troubling as it draws conclusions based on little or no substantive data or analysis. Further, as stated in the Scoping Document, the applicant is required to discuss gentrification as it specifically relates to the "scale" of the proposed project. There is no evidence that the applicant has attempted to fulfill this requirement. Given the cursory overview presented in Section 8.4 (DGEIS), readers will find little to assist them in wading through the complex subject of gentrification and even less aid in determining the potential environmental impacts of the residential portion of the proposed project.	97	While gentrification is a "difficult phenomenon to measure", this does not exempt the applicant from presenting a more in-depth analysis than the one page that is currently offered.	3	3E	N	N	8.4	See Response to 97	Former 99
	Character of Community	Gentrification	The final paragraph of Section 8 (DGEIS) states that, "While the Project does not plan to include any below market rate housing, the additional supply of units allowed under the proposed zoning action can be expected to help slow, reduce, or prevent gentrification in the surrounding neighborhoods by increasing the City's limited housing supply (emphasis added)." This is particularly troubling as it draws conclusions based on little or no substantive data or analysis. Further, as stated in the Scoping Document, the applicant is required to discuss gentrification as it specifically relates to the "scale" of the proposed project. There is no evidence that the applicant has attempted to fulfill this requirement. Given the cursory overview presented in Section 8.4 (DGEIS), readers will find little to assist them in wading through the complex subject of gentrification and even less aid in determining the potential environmental impacts of the residential portion of the proposed project.	97	There is no evidence that the Project Sponsor has attempted to address gentrification as it specifically relates to the scale of the proposed Project.	18	18BG	Y	Y	8.4	Same as 97.	Former 99
	Character of Community	Gentrification	The applicant was instructed in the Final Scoping Document, Chapter 9: Growth Inducing Aspects and Character of Community, pages 60-61 to include in the DGEIS discussion of a number of specific potential impacts relating to housing, thus establishing the breadth of information required (bolding added): 1) Discuss the diversity of housing unit types as well as pricing. This will include an estimate of the number of each housing type and size. 2) Evaluate existing market demand and need with a comparison to the proposed housing portion of the Project. 3) Discuss the gentrification of urban areas and the impacts to the City and Town with a concentration on the scale of the development and tax revenues. Each of the topics above was at least mentioned in the DGEIS, Chapter 8: Growth Inducing Aspects and Character of Community, in either Section 8.3: Population/Demographics or Section 8.4: Gentrification. However, given that these two sections together amount to approximately 2 pages in length, it is my opinion that none of the above points have been adequately addressed in terms of both the depth and type/source of information presented. Without data drawn from a wider range of sources that can serve as the basis for a more in-depth analysis of this complex set of issues, I feel strongly that readers of the DGEIS do not have adequate information to make informed decisions about these important components of the environmental analysis.	98	Break into three parts: 3) Discuss the gentrification of urban areas and the impacts to the City and Town with a concentration on the scale of the development and tax revenues	3	3B-3	N	N	8.4	See Response to Comments 91 and 97.	Former 99

CHAIN WORKS DISTRICT
DGEIS COMMENT MATRIX

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	Use and Conservation of Energy	Alternative Energy	Chapter 9: Effect of the Proposed Project on the Use and Conservation of Energy The City of Ithaca recently received money from NYS to look at the Chain Works District as one of two areas in the city where there could be a lot of alternative energy generation for use not only on site, but in surrounding areas as well (e.g. solar, wind, geothermal). The DGEIS is vague as to what's being looked at in terms of alternative energy. There's nothing about the scope and timing of the city study, just tantalizing glimpses and statements about LEED ND. The Final EIS should be much more specific as to what the city study is looking at in terms of alternative energy and what commitments the Chain Works applicant will make in terms of their contribution to alternative energy generation. The FEIS should include onsite energy generation estimates and energy demand estimates. Also, what is the timing on the city's study? How does it compare with the proposed Chain Works construction phasing?	99	The DGEIS is vague as to what specific alternative energy sources will be utilized. Also the Project is included in the City of Ithaca NY Prize Grant; provide more details of the Study.	18	18BK	Y	Y	9	The purpose of the GEIS is to address broad planning questions. The timeframe for the development of the Project is 7 to 10 years. The means of generating alternative energy is rapidly changing such that today's state of the art technology will be obsolete when implementing later phases of the CWD development. Therefore, the DGEIS approach is to state generically the multiple alternative energy techniques may be utilized with a specific performance goal of achieving at least a 70% reduction in fossil fuel use in compliance with the Architecture 2030 Challenge. See also response to Comment 79.	Former 100