Appendix A
Responses to Comments Received

I-81 Viaduct Project

Onondaga County, New York

Responses to Comments Received on the Final Design Report/ Final Environmental Impact Statement (FDR/FEIS)

U. S. Department of Transportation
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TABLE OF CONTENTS

1 Introduction 1

2 Project Purpose, Objectives, and Need 1

3 Viaduct Alternative 2

4 Community Grid Alternative 2

5 Other Potential Alternatives 9

6 Transportation Considerations 10

7 Social, Economic, and Environmental Considerations 12

7-1 Land Acquisition, Displacement, and Relocation 12

7-2 Local and Regional Economies 13

7-3 Historic and Cultural Resources 16

7-4 Air Quality, Energy, and Climate Change 20

7-5 Noise 20

7-6 Natural Resources 21

7-7 Construction 22

8 Public Outreach 22

9 Letters from Organizations and Agencies 25

9-1 U.S. Environmental Protection Agency (USEPA) 25

9-2 City of Syracuse 27

9-3 Families for Lead Freedom Now! and Signatories 34

9-4 Upstate Medical University, Occupational Health Clinical Center (OHCC) 36

9-5 New York Civil Liberties Union (NYCLU) 42

9-6 Form Letters (via NYCLU) 47

9-7 Petition (Via NYCLU) 49

9-8 Municipality Letters 50

9-9 Town of DeWitt, Supervisor 51

9-10 American Institute of Architects-Central New York (AIA-CNY) 51

9-11 Pyramid Management Group and Destiny USA 54

10 List of Commenters 62

1 INTRODUCTION

This appendix contains the substantive comments received on the Final Design Report/Final Environmental Impact Statement (FDR/FEIS) for the I-81 Viaduct Project. The public review period for the FDR/FEIS began with the document's publication on April 15, 2022 and extended to May 16, 2022. The Federal Highway Administration (FHWA) and the New York State Department of Transportation (NYSDOT) received more than 1,000 comment submissions. The public had the opportunity to submit comments by email, by U.S. Mail, and by calling the telephone hotline and leaving a voicemail. Each comment was reviewed and categorized. Similar comments were grouped and summarized, and a response is provided to each summary comment in this appendix. The original comment submissions are provided on the Project website, https://webapps.dot.ny.gov/i-81-viaduct-project.

The comments are grouped by broad topics and, in some cases, more specific subtopics. See Section 10 of this appendix for the list of commenters and comment number(s).

2 PROJECT PURPOSE, OBJECTIVES, AND NEED

C 2-1: The public needs to see the cost comparison between just replacing the section that will be removed and the cost of restructuring I-481 between the intersections at I-81. If three lanes are needed on I-481, this must be 10 times the cost of simply replacing the section of I-81 that is being removed!

R 2-1: Appendix A-5 of the FDR/FEIS provides a summary of cost estimates for the Viaduct Alternative ($2.42 billion) and the Community Grid Alternative ($2.25 billion). The cost summaries include estimates for highway work and for other elements needed to complete each alternative.

C 2-2: I support the No Build Alternative. With all the infrastructure problems we face, it seems money would be best spent elsewhere. People have come to expect traffic flows as they are, and we have moved into an area accepting this. If you add minutes to people's lives waiting in traffic this is going to add up to a lot of wasted time and angry people. Please leave well enough alone.

R 2-2: See response to Comment 2-1 in Appendix M-5 of the FDR/FEIS with respect to the No Build Alternative.

C 2-3: What is the annual repair and maintenance cost of the viaduct section from approximately Van Buren Street to I-690, including ramps to and from the viaduct and ramps to I-690, say, over the last five or ten years on average? That would seem to be important. Evaluate the No Build Alternative.

R 2-3: As described in Chapter 1, Introduction, I-81 is in need of repairs, and current traffic safety issues are a key consideration for the I-81 Viaduct Project. The No Build Alternative would

maintain the highway in its existing configuration. Continual maintenance and repairs would be performed to ensure the safety of the traveling public, and safety measures would be implemented to the extent feasible and practical. Structural deficiencies and safety considerations would be addressed as part of NYSDOT's ongoing maintenance program. In addition to routine maintenance efforts (such as filling pavement cracks, patching holes in bridge decks, cleaning drainage systems) and operational considerations (e.g., signage and other low-cost improvements), the facility has required an increasing number of emergency repairs of greater magnitude to keep it serviceable, particularly in the last few years. While these costs continue to increase, they are not always predictable, as is typical of infrastructure of this age. However, over time, the maintenance may be costlier than NYSDOT's budgets can tolerate, making continued operation unreasonable.

3 VIADUCT ALTERNATIVE

C 3-1: Commenters expressed the opinion that the viaduct should be rebuilt, citing several reasons including the following: maintaining a direct, high-speed interstate through the City would provide the best travel times, congestion in Syracuse would become much worse without the elevated highway, commercial uses could be built underneath a rebuilt I-81 viaduct, drivers from the western suburbs would have to travel out of their way to pick up southbound I-81, it would be cheaper than other alternatives, it would function better during the winter, and truck traffic would not be at grade.

R 3-1: See response to Comment 3-1 in Appendix M-5 of the FDR/FEIS with respect to the selection of the Viaduct Alternative.

4 COMMUNITY GRID ALTERNATIVE

C 4-1: Commenters expressed support for the Community Grid Alternative, citing the removal of the existing I-81 viaduct through the City and the alternative's ability to address transportation needs and provide transformational opportunities for the City and its neighborhoods, among other reasons. Commenters also expressed support for the removal of the roundabout previously proposed at Martin Luther King, Jr. East (MLK, Jr. East) and Business Loop (BL) 81; the use of appropriately scaled roundabout design to provide safe traffic control and performance in urban areas; and the reduced speed and street width design in urban areas.

R 4-1: As stated in this Record of Decision (ROD), the Community Grid Alternative is the Selected Alternative for the I-81 Viaduct Project.

C 4-2: This project should not proceed as planned. The Community Grid Alternative is a bad idea for many reasons, including that it will: increase traffic on I-481 to an unacceptable degree; slow traffic by using a Community Grid; create further disruption to communities by putting traffic on ground level; create longer travel times for trips to the hospitals; waste fuel; create smog; take drivers out of their way to get to destinations such as the Carrier Dome or the

State Fairgrounds, which they can now access with the elevated highway; create gridlock through Syracuse and force people to leave Syracuse due to this impossible gridlock; deter people from visiting, especially those south of the City; destroy the economic progress that the northwest part of Syracuse has experienced since the elevated highway was built; ruin the economy of Syracuse in general; be terribly inefficient during the hard winters; not enhance neighborhood connectivity; not re-create what existed before the early 1960s or ameliorate past harm; destroy historic resources; and possibly lead to more crime in the Community Grid Alternative area.

R 4-2: See response to Comment 4-2 in Appendix M-5 of the FDR/FEIS with respect to the selection of the Community Grid Alternative. See Section 4, Community Grid Alternative in Appendix M-5 of the FDR/FEIS for additional information on the Selected Alternative. See Section 6, Transportation Considerations of Appendix M-5 of the FDR/FEIS with respect to traffic and other transportation concerns. See Section 7, Social, Economic, and Environmental Considerations of Appendix M-5 of the FDR/FEIS for related concerns.

C 4-3: Your plan for I-81 turns the clock back 62 years and destroys the accompanying progress for the northwest area of Onondaga County. Those of us who live in that area get to use more expensive gasoline regardless of whether we use the so-called Grid or traverse I-90 and I-481 just to get to southbound I-81. The current plan should not even be considered until the Fairmount to I-81 access, which was promised 50 or so years ago, is completed. Your current plan is unworkable and a disrespectful waste of taxpayer money.

R 4-3: See response to Comment 4-2 in Appendix M-5 of the FDR/FEIS with respect to the selection of the Community Grid Alternative. The western segment of the proposed Grand Avenue Arterial Project would have connected the westerly end of Seymour and Shonnard Streets to a new arterial along Grand Avenue that would have extended through the hamlet of Taunton to a connection in Fairmount at the Route 695/West Genesee Street intersection. This project, which was canceled about 50 years ago would have provided access to I-81 from the western suburbs using the proposed arterial and to Seymour, Shonnard, and Adams Streets, is not needed to address the I-81 Viaduct Project's needs or meet its objectives.

C 4-4: If anything, a lane should be added over Almond Street to separate eastbound traffic, as well as a direct connection between eastbound I-690 and northbound I-81, a direct connection between southbound I-81 and westbound I-690, and extended exit ramps at I-481 and Route 5.

R 4-4: See Section 3.4.3 of the FDR/FEIS with respect to improvements in these areas. See response to Comment 6-25 in Appendix M-5 of the FDR/FEIS with respect to the Project's design to accommodate travel demand. See response to Comment 4-102 in Appendix M-5 of the FDR/FEIS with respect to improvements at the BL 81/I-690 interchange. See response to Comment 4-15 in Appendix M-5 of the FDR/FEIS with respect to Interchange 3 along existing I-481.

C 4-5: The I-481/I-690 interchange should be upgraded to accommodate the expected increase in traffic. NYSDOT should remove themselves from this decision because they have made safety a secondary consideration behind keeping their dedicated access location.

R 4-5: See responses to Comments 4-32 and 4-33 in Appendix M-5 of the FDR/FEIS with respect to improvements at Interchange 4 (the I-481/I-690 interchange). As stated in Chapter 1, Introduction of the FDR/FEIS, improving safety is a key goal and objective guiding development of the Project.

C 4-6: Why don't you consider an exit for South Geddes Street and have it connect to westbound I-690?

R 4-6: Additional access ramps at South Geddes Street and I-690 are not needed to address the need or meet the purpose and objectives of the Project.

C 4-7: CSX requests that the design criteria for horizontal and vertical clearances shown in Table C-6.4-5 of FDR/FEIS Appendix C-6.4 be modified as shown in the attached drawing.

R 4-7: NYSDOT is working with CSX to develop an agreement for the final design and construction phase of the Project. CSX's design criteria comments will be resolved as part of this process.

C 4-8: What will happen to the mile marker signage on the Project (on both the current I-81, current I-481, and the new I-81 loop)? Will GIS data showing the new configurations be made available to Onondaga County 911 and other agencies?

R 4-8: NYSDOT will be installing mile markers in the Project and will work with Onondaga County 911 and other agencies to supply available data.

C 4-9: Although the new section of BL 81 is classified as such, there are significant areas adjacent to the aforementioned loop that are overwhelmingly residential; in the portion of the loop between East Colvin Street and Cedar Street, for example, there are only five businesses along it. Thus, the proposed re-designation as BL 81 is a misnomer since it gives the impression that residential areas will be subjected to the same traffic regulations governing business districts, which do not fully consider the well-being of residents in terms of exposure to air and acoustic pollution. Therefore, consider changing the re-designation from BL 81 to simply Loop 81 to reflect the statistical preponderance of residences in areas abutting long segments of I-81.

R 4-9: The air quality and noise analyses conducted for the Project are independent of any roadway designation. Potential air quality and noise impacts were fully assessed for the Project. See Section 6-4-4, Air Quality and Section 6-4-6, Noise of the FDR/FEIS.

C 4-10: More needs to be done to slow down motorists coming onto the Community Grid/BL 81. The traffic-calming measures proposed, including the roundabout, signage, and plantings on a

median and along either side of the road, would not be adequate to deal with what has been the norm for decades: motorists on I-81 speeding significantly over the posted 45 mph speed limit once they get to the viaduct. These drivers are accustomed to speeding without facing any consequences for breaking the law; hence, New York State should use devices such as radars to prevent this violation of the speed law from continuing under the Community Grid Alternative.

R 4-10: See response to Comment 4-56 in Appendix M-5 in the FDR/FEIS with respect to speed enforcement.

C 4-11: While the amount of traffic and the need for a third lane at Interchange 2 along existing I-481 can be debated, the necessity to lengthen the exit lanes at Interchange 2 cannot. The exit lanes do not have enough length at a full car width to exit at highway speeds. As the case is now, every car will slow down 10-15 mph below the current speed limit while in the non-exit lane to make that exit. At times, some drivers will take these exits at 35 miles an hour, basically making I-481 a one-lane highway even in mild traffic. In the drawings of this Project, not one of the improved exit lanes are this short. Furthermore, the improvement of these exit lanes would not impact any buildings or encroach on private property.

You cannot have it both ways by saying almost all of the traffic will go around the City and not have two lanes able to maintain full highway speeds to handle this increased traffic. This is an enormous project that has far-reaching implications all over the state. As someone who drives this section of road every day for the last 25 years, you have this part of the project wrong, dead wrong. And to say it is not part of the scope of this project is insulting while just two miles north on I-481 you are addressing the same issues. Lastly, these improvements would be rounding errors to the overall monetary budget of the project. Please reexamine this issue.

R 4-11: See response to Comment 4-13 in Appendix M-5 in the FDR/FEIS with respect to Interchange 2. Please also note that the southbound exit ramp design at Interchange 2 has been checked and found to meet current design standards. The exit ramp is a “taper type” exit ramp configuration that meets current AASHTO standards. The actual length of the ramp is 865 feet, which exceeds the minimum recommended length of 615 feet, based on a 70 mph mainline design speed (refer to AASHTO – A Policy on Geometric Design of Highways and Streets, Chapter 10, Figure 10-73 and Table 10-6). Given that the existing ramp meets current design criteria, that the future Level of Service for this section of freeway is predicted to be LOS C or better, and that there is no crash pattern associated with this exit ramp, modification of the ramp is not required to meet the Project’s needs and objectives.

C 4-12: The Community Grid Alternative is the right choice as the Selected Alternative.

R 4-12: As stated in this ROD, the Community Grid Alternative is the Selected Alternative for the I-81 Viaduct Project.

C 4-13: At its core, the Community Grid plan is more a highway alternative with a viaduct removal option than a genuine street-grid alternative. Consider the following:

1. Southern BL 81 remains a freeway all the way to downtown's edge; most of the berm it lies on will remain with the Project. This isolates the road and precludes meaningful future development along it. It also continues to block the original main entrance to Oakwood Cemetery. Instead, increase grid connectivity; remove the berm, and lower the road to grade; convert existing highway exits to at-grade roundabouts; and add roundabouts at Colvin Street and Brighton Avenue.

2. Northern BL 81 within the city remains a freeway all the way to downtown; astonishingly, NYSDOT plans to add lanes! This leaves behind enormous development opportunities to revitalize the Northside and tie it in to the Inner Harbor. Instead, remove the expressway and eliminate the exit and its flying ramps between BL 81 and I-690, thereby eliminating all of the spaghetti junction; move the I-690 exit to a reconnected north and south Clinton Street in the form of a compact urban street to highway junction (half junction, easterly); enhance the street grid in the area to disperse the traffic, i.e., a true street-grid solution; convert the I-81 path into “Oswego Canal Way,” a new mixed-use public transit oriented way, which will create enormous development opportunities along its path and throughout the Inner Harbor district and Destiny Mall, and will make possible a successful Canal Park/District.

3. By maintaining the northern and southern freeways to downtown, traffic will continue to flow much as it does today: in a concentrated way all the way to downtown where just a few streets and intersections will bear the brunt of the traffic. Instead, redevelop into Erie Canal Way, a mixed-use public transit oriented way to connect with and further enhance “Oswego Way” and the Canal District; rebuild a compact I-690 junction at Almond Street, and build only a half junction (easterly traffic) at the proposed Irving Avenue/Crouse Avenue location. The two “canal ways” would create a new prime residential and retail hotspot, as well as a tourist draw, by making it (naturally) the path of the State Canalway Trail.

4. I am very much for a Canal Park/District. But the current concept is completely undermined by making the streets that traverse the park—Oswego Boulevard and Pearl Street—the on/off ramps of northern BL 81, not exactly a park-like setting. Also, the current concept is too small to be useful, much less attract development. The concept is but a token; it should encompass a much larger area and development plan. As others have said, it need not consume the whole right-of-way. A parkway-like street is very nice, but there are no park-like features along Almond Street to tie into. A somewhat narrowed right-of-way that provides space on the west side for a new row of buildings seems more appropriate. On the other hand, West Street, which has the Creekwalk and park space to tie into, might be the better street to make parkway-like, and it would create an additional area of development stimulus.

5. Oswego Boulevard and Pearl Street face either a tiny street or no street across Erie Boulevard, no direct traversal. This means traffic must turn onto Erie Boulevard to hunt for a viable street, which means traversing two intersections to cross Erie Boulevard. Erie Boulevard will get very congested. All of which further undermines a viable Canal Park/District.

The above elements create the structural foundation for a true street-grid solution and decades of future cultural and economic development and prosperity for Syracuse. Without such foundation, Syracuse's mediocre future will be cemented. Now is the only opportunity to make such structural changes. I hope the urban design firm recently hired by the mayor for the Project has the mandate to consider project alternatives broadly, with vision, rather than narrowly, only to tweak minor elements of the current NYSDOT Community Grid plan.

God bless NYSDOT. But their mandate is transportation, not comprehensive urban planning. That's the community's job. It's up to us to tell them and show them what we want for our city. Let's not leave so much on the table. In a nutshell, for a true street-grid solution—and a brighter future for Syracuse—remove the I-81 expressway within Syracuse and replace it with new and upgraded city streets and intersections.

R 4-13: See response to Comment 4-46 in Appendix M-5 of the FDR/FEIS with respect to extending the Community Grid Alternative farther south than as proposed. See response to Comment 4-47 in Appendix M-5 of the FDR/FEIS with respect to the Oakwood Cemetery entrance. See responses to Comments 3-116a through 3-116gg in Appendix M-5 of the DDR/DEIS with respect to the Full Street-Grid concept. NYSDOT will meet with the City and its recently hired urban design firm as design progresses.

C 4-14: It would be beneficial to the DeWitt community to have safer pathways along Route 5 in order for walkers, runners, and cyclists to safely cross the new highway.

R 4-14: See responses to Comments 4-28 and 4-29 in Appendix M-5 of the FDR/FEIS with respect to pedestrians and bicyclists at Interchange 3.

C 4-15: When comparing the price tag for a viaduct replacement or the Community Grid, one huge factor NYSDOT continually leaves out is the new ramps connecting I-81 and I-690, a major defect in the original design of the I-81 and I-690 interchange. The Grid does not offer this option. Therefore, the price of those two flyovers should be deducted from the cost of the viaduct for comparison reasons. It is like comparing apples to oranges. I truly do get the social and economic concerns of NYSDOT and appreciate their efforts with these two major issues. However, NYSDOT should be concerned about transportation first and then look at project effects on the social or economic side. In this case, NYSDOT looked at the social aspect and transportation was basically an afterthought. One only has to drive around the county to see the many NYSDOT blunders in this area to know why there is zero confidence in this project.

R 4-15: See response to Comment 4-102 in Appendix M-5 of the FDR/FEIS with respect to I-81/I-690 interchange.

C 4-16: NYSDOT is constantly complaining about the trucks hitting the Parkway bridge. Wait until there is a Community Grid in the city and you have all these independent truckers, who are

operating on a wing and a prayer. Simple economics will force them to choose the shortest route possible.

R 4-16: See response to Comment 4-93 in Appendix M-5 of the FDR/FEIS with respect to the Onondaga Lake Parkway bridge.

C 4-17: I fully understand the traffic calming and dispersion benefits of roundabouts and, equally importantly, the importance of the sight lines, proper radii, and the substantial land area that double lane roundabouts typically require to be properly designed.

You should not have been surprised to get pushback from the community rather than support for your concept of a roundabout near MLK, Jr. East in the fall of 2021. While I'm an architect, not a traffic planner, I'm fairly certain roundabouts and elementary schools should rarely or ideally never be near each other. Here we are with a requested quarter billion dollar increase and an additional year added to construction. How much of that quarter billion or extended schedule is associated with shifting the roundabout? Taking the school proximity issue completely out of your minds for just a moment, is Van Buren Street really a better location for the roundabout? Seems like student housing complexes, steep topography, and the practically immovable location of one historic railroad make this a very challenging site to shoehorn this ever so important roundabout.

R 4-17: The roundabout at Van Buren and Almond Streets will not impact student housing. As part of the installation of the roundabout, Van Buren Street will be regraded to be slightly less steep. The New York, Susquehanna, and Western Railway bridge near Renwick Avenue will be rebuilt as part of the Community Grid Alternative, which realigns the roadway farther east than I-81 is today.

C 4-18: Will the Van Buren Street location actually be better from a traffic planning standpoint than near MLK, Jr. East? The original location near MLK, Jr. East was probably the right location for a roundabout and maybe, just maybe, for the last 72 years, the wrong location for an elementary school. By state school planning standards, the site for such an elementary school should be 10 acres, not 5.3, and certainly not near railroads or interstates. What would it take to move an elementary school population by constructing a new state-of-the-art school strategically located along a complete street in the walkable neighborhood it serves? I already wagered an educated estimate of about $65M, not a big number in your sphere and certainly not your funds to find; however, I suspect if a new school just down Washington Street in both directions could be justified by decision makers, the NYS Education Department aid formulas would pay for at least two-thirds of that $65M. Where would you find a 10-acre site for a new school? Just three blocks to the west at the double block between Furman and Kennedy Streets. The City already owns 2.4 acres. It appears by tax records that 42 percent of the parcels needed in that double block are vacant land. Our City's School District should probably be ashamed of the lamentable McCarthy at Beard building sited there where they have assigned or confined(?) 78 special education children. Shouldn't these souls and the extremely hard working teachers and support staff actually be

in a far more inspiring and better school environment like the original McCarthy, the building that Mayor Alexander and his carefully "chosen" architect built specifically for special education children near the Clary Middle School? Those deserving families rarely get a voice here. Imagine a new school so fabulous that it may even make Fayetteville residents jealous. It may be more cost effective and better long-term urban planning than shifting a roundabout. The 13205 neighborhood likely deserves that new school before mine.

Why shouldn't your project start the dialogue, be the catalyst to get the right people to a bigger table, the visionary decision makers to consider something that makes families actually desire and even proud to live here, not just visit for the workday? For the next century these are truly monumental decisions. Attached is an annotated excerpt of a map of the area showing roundabouts and one potential new school site.

R 4-18: See response to Comment 4-60 in Appendix M-5 of the FDR/FEIS with respect to relocating the Dr. King Elementary School.

C 4-19: The Community Grid Alternative is going to cause people to walk across Almond Street, possibly getting hit. It is going to cause so much confusion with people driving through at about 55 or 65 mph.

R 4-19: The Community Grid Alternative includes many pedestrian safety improvements, and the posted speed limit on the Almond Street portion of BL 81 would be 30 mph. Refer to Section 3.4.3 of the FDR/FEIS for additional information.

5 OTHER POTENTIAL ALTERNATIVES

C 5-1: We have a great opportunity to honor a great local historical figure by building the Harriet Tubman Memorial Bridge. This would keep traffic flowing through the city, and you could still have the Community Grid. The bridge could even collect tolls. Syracuse would probably be the first city in the country to take on such a project and would be the blueprint for other cities to follow.

R 5-1: See response to Comment 5-10 in Appendix M-5 of the FDR/FEIS with respect to the Skyway concept.

C 5-2: We need a consensus plan that meets the needs of all residents, like a tunnel or a combined Community Grid and tunnel design. While it would be more expensive, toll I-81 in New York State to fund the construction and maintenance of a tunnel. It's not too late to integrate a tunnel into the improvement plan of I-81 in downtown Syracuse. While there were problems with the Big Dig in Boston, we can learn from those problems; after the completion of that project, it was well worth it. Another success story we can learn from is the replacement of the State Route 99 elevated highway in Seattle, WA with a tunnel.

R 5-2: See response to Comment 5-17 in Appendix M-5 of the FDR/FEIS with respect to the Tunnel Alternative.

C 5-3: Viaduct changes could include piggybacking I-81 over the existing railroad right-of-way, turning right near Hiawatha Boulevard to go past Destiny USA, and connecting to I-81 near the train station and the stadium. This way visitors get to see (and spend money in) the City, Destiny USA gets a better exit, and the businesses in Mattydale and North Syracuse are not destroyed.

R 5-3: See response to Comment 5-15 in Appendix M-5 of the FDR/FEIS with respect to this concept.

6 TRANSPORTATION CONSIDERATIONS

C 6-1: The Project will increase travel times.

R 6-1: See response to Comment 6-3 in Appendix M-5 of the FDR/FEIS with respect to travel times under the Community Grid Alternative.

C 6-2: Traffic on I-481 will be a nightmare.

R 6-2: See response to Comment 6-11 in Appendix M-5 of the FDR/FEIS with respect to traffic on I-481.

C 6-3: Long-haul truck traffic has been chronic problem in Skaneateles and other towns in the Finger Lakes region. It is caused by large, long-haul trucks taking short cuts from I-81 through the secondary back roads to and from destinations to the west of I-81. The proposed viaduct project would only exacerbate the problem. NYSDOT has not proposed any enforceable measures to keep these long-haul trucks on the interstate, and the current design of the Community Grid Alternative would require these truckers to travel more miles and increase the time and expense to reach destinations to the west of Syracuse. The higher costs would clearly create a further incentive for them to take shorter routes through small rural villages and towns where the roads cannot handle such traffic. We are hopeful that NYSDOT will recognize and acknowledge this and take concrete steps to mitigate the negative impacts that would result from the proposed I-81 Viaduct Project.

R 6-3: See response to Comment 6-9 in Appendix M-5 of the FDR/FEIS with respect to traffic in the Finger Lakes region.

C 6-4: As a lifetime resident of Onondaga County, I can remember when I-81 and the viaduct were built. I can't fathom no longer having it to access the hospitals, downtown, and SU from the western and northern parts of the County. Emergency vehicles have a hard enough time getting through traffic when there is an event at the Carrier Dome, but add to that the extra congestion caused by the Community Grid and people's lives will be at stake.

R 6-4: See response to Comment 6-5 in Appendix M-5 of the FDR/FEIS with respect to hospital access. See responses to Comments 6-13 and 6-60 in Appendix M-5 of the FDR/FEIS with respect to access from the western and northern suburbs.

C 6-5: When there is a major sporting event at the Carrier Dome, the Community Grid will exacerbate this congestion. There should be several ways to leave the area after an event.

R 6-5: See response to Comment 6-45 in Appendix M-5 of the FDR/FEIS with respect to Dome-related traffic.

C 6-6: The Town of Skaneateles, as part of the Finger Lake area of small communities, is greatly concerned about the protection of Skaneateles Lake, which provides public water to over 200,000 people, as well as the impact of increased trucks that leave I-81 to seek short cuts to Route 20 and/or the NYS Thruway. These diversions could have environmental and economic impacts on these small rural communities. Since the Project Area did not include the Homer/Cortland exit on I-81 we do not believe this has been properly evaluated.

R 6-6: See response to Comment 6-9 in Appendix M-5 of the FDR/FEIS with respect to traffic in the Finger Lakes region, including the Homer/Cortland area.

C 6-7: The public has not been provided with plans that take into account demographic and employment changes since 2013 when the last traffic projections were made. In 2013, Syracuse was still in recession. The landscape has changed and we need new data to make a sound decision. The traffic projections based on the 2013 sampling were anemic then; now they are reckless. We have added population, thanks in part to Covid-19. We have organic growth in almost all employment sectors. We have turbo-charged growth in manufacturing, transportation, and warehousing—all intertwined with multiple vehicle trips per day. We have economic development projects about to go on line, and we have proposed projects including a new Syracuse Aquarium, a soccer/lacrosse complex, and expansion at Syracuse Hancock Airport. To fail to test an existing idea with new data is irresponsible, at best.

R 6-7: See responses to Comments 6-69, 6-94, and 9-347 in Appendix M-5 of the FDR/FEIS with respect to the travel demand model.

C 6-8: The EIS process has not complied with EPA requirements to allow meaningful public input and feedback as requirements for citizen participation.

The public has been misled by erroneous traffic projections.

Flaws in NYSDOT's DEIS have existed since the start of the Project but have never been corrected. Its own analysis shows that the 481 Bypass/Community Grid will increase travel times, miles traveled and result in slow moving traffic congestion in many areas.

The underestimated projected growth in traffic understates the negative impact that the traffic diverted to neighborhood streets will have on the primarily minority residential community. This underestimation is misleading and unfair to affected residents.

The data provided to the public underestimates the impact on the environment.

- The presentation of extended trip times as insignificant fails to consider the cumulative effect of the volume of the individual two-way trips on air pollution, fuel consumption, noise, and accidents. An increase of two minutes in a 20-minute commute represents a 10% increase in pollution, fuel, and risk over the No Build Alternative based on the number and extended duration of commuter trips.
- Actual traffic counts were arbitrarily cut 20% to alleviate the Community Grid preferred alternative's unavoidable failures, after which the actual 19-year average annual growth rate of 2.7% was cut to a projected growth rate of 0.2% from the initiation of design in 2014 to the Design Year of 2056, resulting in a NYSDOT projected overall growth of 7%, where use of the historic growth rate would show a 123% overall growth in traffic volume.
- The understatement may be worse. The estimated drive times do not consider connections between points west and points south of Syracuse. Vehicles west of Syracuse traveling eastbound on I-90 or Rte 690 and wanting to go south on I-81 are left with two choices: 1) drive east past Syracuse then head south on I-481 to connect with southbound I-81, forcing drivers to add miles to their trip, or 2) take back roads for a more direct connection but causing overuse of small country roads. This is especially problematic if the extra traffic is truckers. The reverse applies for traffic south of Syracuse on northbound I-81 and wanting to head east on Route 690 or I-90.

R 6-8: The alternatives' cumulative effects on travel patterns have been considered; see response to Comment 9-355 in Appendix M-5 of the FDR/FEIS. See response to Comment 9-347 in Appendix M-5 of the FDR/FEIS regarding the validation of traffic count data and traffic projections. See response to Comment 6-3 in Appendix M-5 of the FDR/FEIS with respect to travel times under the Community Grid Alternative. BL 81 would be available for travel between points west and south of downtown Syracuse where I-81 is located today. As shown in Table 8-2 of the FDR/FEIS, travel times between these locations would increase by up to five minutes with the Community Grid Alternative. See Chapter 9 of the FDR/FEIS for a full description of the Project's extensive public and agency involvement.

7 SOCIAL, ECONOMIC, AND ENVIRONMENTAL CONSIDERATIONS

7-1 LAND ACQUISITION, DISPLACEMENT, AND RELOCATION

C 7-1: The FEIS says that it will “replace the public housing projects” but not with “public housing.” What guarantees that all current public housing tenants needing the rents and assurances of “public housing” will have the housing they need? The Project is situated in an area with one of the highest rates of poverty in the country, especially among its minority population. How will this $2 billion investment ensure that those who require and are eligible for public housing and its benefits receive them?

R 7-1: The Community Grid (Selected) Alternative would not result in acquisition of public housing or any other residential properties; see responses to Comments 7-21 and 7-27 in Appendix M-5 of the FDR/FEIS with respect to indirect displacement.

C 7-2: For the past 10 years my neighborhood has worked to beautify the plot at the end of our Ambergate Road by creating gardens of native perennials with whimsical touches including a birdhouse resembling an Erie Canal tugboat. My understanding is that the new entrance ramp from eastbound Genesee Street onto southbound Route 481 will require excavation of the garden area, along with removal or setback of the decorative limestone pillars at the end of Ambergate Road. I would appreciate any information regarding the scheduling of work in this area, so that the plants and birdhouse can be moved to other locations.

R 7-2: The preliminary plans in Appendix A-1 of the FDR/FEIS (specifically, Drawing No. GP-CG-H6-19) show a new curb at the edge of a six-foot right turn lane shoulder, which is also along the face of the existing stone pillars. It is not anticipated that the stone pillars will need to be relocated; however, the pine trees between the pillars, and the landscaped area including the birdhouse are within the anticipated limit of disturbance. The construction work in this area is currently anticipated to be included in the second construction contract, which is scheduled to begin in the spring of 2023.

7-2 LOCAL AND REGIONAL ECONOMIES

C 7-3: If the high-speed access through the City of Syracuse is eliminated, the Dunk and Bright Furniture store would suffer such that it would have to be relocated to another location.

R 7-3: The analysis in Section 6-3-2.4.1 of the DDR/DEIS and FDR/FEIS demonstrated that the Community Grid Alternative would not affect the viability of this business.

C 7-4: I am the Transportation Manager for Clinton's Ditch Cooperative Co Inc, located in Cicero, NY. Clinton's Ditch is an Independent Pepsi Bottler that produces over 27 million cases per year of Pepsi products, as well many other beverages including water, teas, and juices. We have our own fleet, which I manage and direct. We travel over 4.5 million miles a year delivering our products throughout the Northeast, from New Hampshire to Virginia and all points between. I also am the Central Region Vice-Chairman of the Trucking Association of New York. I also serve on numerous other boards relating to highway safety including the Onondaga County Traffic Safety Advisory Board and the County TIM board. Highway safety is extremely important to me, and I have been in this industry for 45 years. To say what happens on our nation's highways is important to me would be an understatement. Obviously, I am very concerned with whatever happens with I-81 in the City of Syracuse.

In October of 2021, the Trucking Association of New York submitted 27 pages of comments that were prepared for us by Quetica Consulting. Quetica painstakingly went through the DEIS and, after researching everything in the DEIS, produced numerous and multiple concerns and comments. When I read the FEIS, I was astonished to see that the DOT replied

with a bunch of gibberish that never answered not one comment and/or question. Lots of fancy talk, but no substance.

In the original DOT document, it states, “The purpose of the Project is to address the structural deficiencies and non-standard/non-conforming highway features in the I-81 corridor while creating an improved transportation corridor through the City of Syracuse that meets the transportation needs and provides the infrastructure to support long-range transportation planning efforts.” Nothing could be farther from the truth for this project, especially since the project, by the DOT’s own words, never looked west of the city. The areas studied by the DOT, in their own words, were:

1 – Central Study Area

2 – South Study Area

3 – I-481 South Study Area

4 – I-481 East Study Area

These are the only areas mentioned in the FEIS, so no, creating an improved transportation corridor was not really considered, nor was long-range transportation planning. From the onset of this project, the DOT has and continues to hammer the traffic that flows through the city and goes north of the city. This is the traffic that is least affected by any project done with I-81 in the city. The added time and mileage to go from south of the city to north of the city, or vice versa, is minimal and therefore the DOT chose to make this traffic their focus, since it had the least impact. What the DOT failed miserably to do was look at the effect on those companies located west of the city or on those in the city such as the Regional Market. There are more than 25 major businesses and employers located west of the city, including almost all the food and beverage companies in this entire region. Also included in these businesses is largest fuel depot in Central NY and the trucking companies that haul all the petroleum. Here is a sampling of the industries located west of the city:

Anheuser-Busch

United Auto Supply

Lowes Home Improvement

W. B. Mason

Raymour & Flannigan

G & C Foods

Sysco Foods

McLean Northeast

Giovanni Foods

River Valley Frozen Foods

Sure Winner Foods

Tessy Plastics

Ainsley Warehouse

Brown's Moving & Storage

CNY Food Bank

Gypsum Wholesalers

Fed-Ex Freight

Riccelli Asphalt

Terpening Trucking

Patriot Tank Lines

ARG

Mirabito Fuel

A Duie Pyle

Gypsum Express

Old Dominion Freight Lines

So while there has been a lot of talk about the businesses in the Town of Salina and the negative impact the Community Grid Alternative will have on them, there has been no mention of the economic impact on the industries above, which are affected on a much larger scale. The DOT has been able to argue with the Town of Salina, as there they try and justify how the Community Grid will have no effect of Salina. However, there is absolutely no argument about the negative effect a Community Grid will have on these industries and their employees, as some of these are the largest employers in Central NY.

R 7-4: The analysis in **Section 6-3-2.4.1** of the DDR/DEIS and FDR/FEIS considered the potential effects of the Community Grid Alternative on business conditions in the Central Study Area, including businesses west of the City.

C 7-5: The residents of Pioneer Homes—those affected the most by anything that is done with I-81, and those who were wrongly shoved out during the initial construction of I-81—are once again going to suffer the most and will once again be shoved out. If the Community Grid Alternative happens, there is no way that low-income housing is going to be part of the final project. S.U. and Upstate Hospital are out of room. They believe a Community Grid will offer them all sorts of expansion potential. This may be true, but it is going to be at the expense of the current residents of Pioneer Homes. They will once again be displaced.

R 7-5: The Community Grid Alternative will not displace any residents. See responses to Comments 7-21 and 7-27 in Appendix M-5 of the FDR/FEIS with respect to indirect displacement.

C 7-6: NYSDOT has totally failed, as is clearly and unavoidably exhibited in the State Environmental Review Process (SEQRA) and FEIS documents they have published, to adequately identify and consider the negative impacts to the Town of Salina. SEQRA requires a "hard look" at all the potential negative environmental and economic impacts a project could have to a community. These impacts include the potential environmental and economic damage a project like the Community Grid Alternative would have. The FEIS has failed to address any of the socioeconomic and environmental impacts that will affect the Town of Salina, including but not limited to environmental justice and local and regional economies for the corridors adjacent to these I-81 interchanges through Salina.

R 7-6: The EIS documents, including this Joint NEPA/SEQRA Record of Decision and SEQRA Findings Statement, were prepared in accordance with NEPA (42 USC § 4321 et seq.), the Council on Environmental Quality regulations for implementing the procedural provisions of NEPA (40 CFR Parts 1500 to 1508), the FHWA Environmental Impact and Related Procedures Final Rule (23 CFR Part 771), and the NYSDOT Procedures for Implementation of SEQRA (17 NYCRR Part 15). In accordance with 17 NYCRR Part 15, when a Federal EIS is being prepared, NYSDOT and other New York State agencies undertaking a discretionary action for the Project have no obligation to prepare a separate EIS under SEQRA. NYSDOT has considered the facts and conclusions relied upon in the Federal FEIS and determined that the requirements of Article 8, Section 8-0109 of the New York Environmental Conservation Law and implementing regulations have been met.

C 7-7: The Community Grid Alternative will adversely affect the Town of Salina. Businesses will leave, creating a loss of property tax revenue, sales tax revenue, and room occupancy and gas tax revenue. In addition, the closure of businesses in these corridors will create blight in the community and injure the Town's population economically.

Additionally, concerns from the hotel industry remain unchanged. These hotels are located within close proximity of I-81. To state that they will only lose 1.3 percent of their business (or one room per night) is simply not accurate.

R 7-7: See responses to Comments 7-52 and 7-53 in Appendix M-5 of the FDR/FEIS with respect to potential economic effects in the Town of Salina, including hotels.

C 7-8: Diverting travelers and traffic away from the city center will hurt future growth by not making the city visible to travelers. Isn't making something visible a great selling point for prospective businesses looking for a place to call home?

R 7-8: See responses to Comments 7-64, 7-65, and 7-66 in Appendix M-5 of the FDR/FEIS with respect to potential economic effects in downtown Syracuse.

7-3 HISTORIC AND CULTURAL RESOURCES

C 7-9: As one of the Consulting Parties for the I-81 Viaduct Project in Syracuse, the American Institute of Architects Central New York Chapter (AIA CNY) supports the following:

First, we support the primary position of the indigenous peoples, the Onondaga Nation and Tuscarora Nation, who came before us, in this DOT 106 (PA) Project Agreement.

Second, the AIA CNY Chapter is in full support of the Community Grid Alternative as the preferred DOT plan to advance, including the removal of the existing I-81 viaduct through the city.

R 7-9: Comment noted.

C 7-10: Third, as this PA notes (p.1/35), "the effects of the Project cannot be fully determined prior to approval of the Project," and (p.2/35) "the Area of Potential Effects (APE) Appendix 1" includes Oakwood Cemetery and the Pioneer Homes properties. We continue to note that we do not agree that (p. 4/35) "the Community Grid Alternative would have no-adverse effect on NR-eligible or listed architectural properties within the APE." Our recommendation: [text missing].

Fourth, Oakwood Cemetery and Pioneer Homes are significant historic resources that remain unaddressed by the I-81 Project FEIS of April 2022. The AIA CNY Chapter continues to advocate for these important environmental and historic issues not yet being adequately addressed. They will suffer additional harm from the current DOT Project FEIS, including the following:

Regarding Oakwood Cemetery:

1. Neither options studied by the DOT has addressed I-81's original and continuing damage to Oakwood Cemetery, a National Register Historic Places property, which could be enhanced by the proposed Community Grid Alternative.

2. The original connecting city street for over 100 years (from 1859 to 1964), Oakwood Avenue was closed and blocked as the Main Entry Gate to this NRHP.

3. This nineteenth-century "Picturesque Landscape Cemetery" served as a natural, healthy parkland to all city residents and was blocked by the I-81 construction.

4. The I-81 FEIS should reduce the grade and speed of the proposed BL design and construction at Oakwood Avenue to allow for the possible future pedestrian and vehicular access to the original Oakwood Cemetery monumental west entrance.

5. Both reducing speed and the existing grade of the BL design at Oakwood Avenue would serve to meet the traffic calming goal around and south of the MLK School neighborhood.

6. The current DOT FEIS plan will add concrete "sound barrier walls" throughout this neighborhood, which will damage the natural environment, increase the negative, intrusive noise and pollution channeling effect of high-speed traffic, and be damaging to the visibility of the historic cemetery property. This area is a city parkland resource taken from the Southside and all city communities, and it should not be further damaged by this new I-81 project.

Regarding Pioneer Homes of 1938:

6. The original 1938 Pioneer Homes project has been review by the State Historic Preservation Office (SHPO) as not-eligible for designation, due to loss of original integrity, caused by decades of subsequent renovations.

7. However, the added pitched truss and asphalt shingled roof construction and the wooden entrance shelters are easily removable to reveal the original 1938 brick residential building structures, as qualitative assets for this project.

8. A project analysis of these original buildings may indicate that the Pioneer Homes portion of the Syracuse Housing Authority project would be eligible for both the 20 percent Federal and 20 percent State Historic Tax incentives, offering new resources and possibilities for a community housing environment of quality, based on a strong community culture.

9. The DOT I-81 project is a highway improvement project, and as such is not charged with improving broader community conditions. But this [sentence is cut-off].

R 7-10: See response to Comment 7-72 in Appendix M-5 of the FDR/FEIS with respect to Oakwood Cemetery. As presented in response to Comment 5-54 in Appendix M-5 of the DDR/DEIS, with respect to the Pioneer Homes, FHWA and NYSDOT engaged in additional consultation with the SHPO regarding a reassessment of National Register eligibility for the Pioneer Homes. Taking these comments into consideration, the SHPO reaffirmed the existing determination that the Pioneer Homes is not eligible for the National Register due to a loss of integrity. In a letter dated February 24, 2020, the SHPO noted that the destruction of two ranges of the complex for the original construction of I-81 resulted in the loss of important elements in its symmetrical site plan and drastic changes in the setting. In addition, there have been alterations to key, character-defining architectural features of the property. As a result of these changes, the Pioneer Homes complex does not meet the criteria for National Register eligibility as outlined in the National Park Service Multiple Property Document entitled “Public Housing in the United States.”

C 7-11: Thank you for sending the Programmatic Agreement for the I-81 Viaduct Project. The Historic Oakwood Cemetery Preservation Association (HOCPA) appreciates the stipulations for addressing archaeological resources in the Project Area. However, HOCPA disagrees with the overall finding of project effects on historic properties, in particular the effects on Oakwood Cemetery (National Register listed at the national level of significance), and therefore will not sign the Programmatic Agreement.

As written in Section 106 correspondence shared with HOCPA, NYSDOT indicates the Project will have no effect on Oakwood Cemetery’s property, architectural resources, and setting, and therefore no mitigation is necessary. HOCPA disagrees with this finding for the following reasons:

1. The Project will result in a change to the setting of Oakwood Cemetery because the proposed BL 81 is substantially a new roadway in both function and physical character. BL 81 adjacent to Oakwood’s west boundary will have a new designation, new traffic

patterns, added sound walls, a changed intersection at Colvin Street, and a new road configuration as the freeway transitions to the Community Grid.

2. NYSDOT did not apply the criteria of adverse effects across the historic property of Oakwood Cemetery, which is a large landscape on a hillside that overlooks BL 81, separated only by a narrow railroad corridor at the base of the hill. Instead, the correspondence shared with the Consulting Parties indicates NYSDOT applied the criteria of adverse effects only to architectural resources, namely the Oakwood Cemetery main entrance gate. Oakwood Cemetery is substantially contiguous to the new BL 81 for approximately one-half mile, from Colvin Street on the south to just south of Martin Luther King, Jr. East/Renwick Avenue on the north.

3. The effect of the Project on stormwater drainage from Oakwood Cemetery has not been addressed in the FEIS under Historic and Cultural Properties or Water Resources. Stormwater is funneled through the main entrance gate and presumably in pipes that run beneath the existing I-81. The proposed new BL 81 on the existing I-81 embankment in front of the main gate blocks the historic path of surface runoff that once drained along the former Oakwood Avenue and/or Renwick Avenue, and the condition of subsurface drainage beneath the highway embankment is unknown. With increasingly heavy storms, runoff is backing up within the cemetery. Last July, a major rainstorm flooded much of the historic entrance area of the cemetery and backed up into the burial areas.

4. NYSDOT did not assess indirect effects on Oakwood Cemetery. The Section 106 process requires assessment of both direct and indirect project effects on historic properties. These secondary effects include:

    a. Noise pollution: As vehicles approach and exit the Community Grid contiguous with the northern half of Oakwood Cemetery and extending to Colvin Street, HOCPA believes there will be increased braking and accelerating over current conditions as drivers transition to the high-speed freeway, resulting in increased noise pollution in Oakwood Cemetery. Existing noise levels from I-81 already adversely affect the historic serene character of the burial sites of thousands, extending well inland from the freeway, and BL 81 may exacerbate these conditions. The FEIS does not address these secondary effects to historic properties aside from stating that Oakwood Cemeteries, Inc., does not want sound wall 12A (Noise, 6-315).

    b. Economic viability: As a new road substantially different from the existing I-81, BL 81 will adversely affect the cemetery operation and preservation of its historic landscape and buildings. BL 81 will block the historic main entrance to Oakwood Cemetery, making the most historically significant northwestern part of the cemetery unappealing for cemetery use, inaccessible, unsafe, and prone to vandalism. In particular, the chapel and old administration building in the historic entrance area will remain economically unviable due to inadequate access, making their adaptive reuse and rehabilitation extremely difficult. While the original I-81 construction introduced these economic adverse effects, it is HOCPA's opinion that BL 81 will exacerbate these

effects and ensure these effects remain for generations to come. The FEIS does not address these secondary effects.

HOCPA hopes NYSDOT will reconsider the effects of the Project on Oakwood Cemetery and recognize concerns that HOCPA and others have voiced since the first Consulting Parties meeting. We encourage you to visit Oakwood Cemetery to better understand the effects of the proposed BL 81.

R 7-11: See responses to Comments 7-71 and 7-72 in Appendix M-5 of the FDR/FEIS. Please note that the term architectural resources includes historic landscapes. FHWA and NYSDOT evaluated effects on the entirety of the S/NR-listed Oakwood Cemetery property, not just the cemetery gates. In addition, the effect of the Project on stormwater drainage was evaluated and is documented in Chapter 5, Section 5.6.3 of DDR/DEIS and FDR/FEIS. During final design, the existing highway drainage system will be rehabilitated or replaced, and any existing drainage issues that are caused by an inadequate or non-functioning existing highway drainage system will be addressed as part of the Project. Please also note that there will not be a noise barrier on the west boundary of Oakwood Cemetery, as the cemetery voted against its inclusion in the Project. The segment of BL 81 adjacent to Oakwood Cemetery will carry substantially less automobile and truck traffic than I-81 under existing conditions and the No Build Alternative (see Appendix C-3-7: 2026 and 2056 No Build Freeway Level of Service in the DDR/DEIS and FDR/FEIS). Furthermore, the speed on the northbound section of BL 81 adjacent to the cemetery will be lower than it is today (45 mph versus 55 mph).

7-4 AIR QUALITY, ENERGY, AND CLIMATE CHANGE

C 7-12: The increase in travel distance to go around the City and the additional stop-and-go traffic on the Community Grid Alternative will increase pollution and greenhouse gas emissions.

R 7-12: See responses to Comments 7-84 and 9-327 in Appendix M-5 of the FDR/FEIS with respect to air quality and greenhouse gas emissions related to the Community Grid Alternative.

7-5 NOISE

C 7-13: The Project must include noise mitigation for the Dewittshire neighborhood. The neighborhood already experiences highway noise from I-481, and with the increased traffic that will come along this residential area there is a great need for noise mitigation.

R 7-13: See response to Comment 7-106 in Appendix M-5 of the FDR/FEIS with respect to noise in the Dewittshire neighborhood.

C 7-14: The Project must include noise mitigation for the neighborhood between Tow Path Road and Kinne Road.

R 7-14: See response to Comment 7-107 in Appendix M-5 of the FDR/FEIS with respect to noise in this neighborhood.

7-6 NATURAL RESOURCES

C 7-15: I would like to know if the Project will include any under- or overpasses for wildlife safety measure and to cut down on traffic accidents by motor vehicles hitting deer. And where will they be constructed?

R 7-15: See response to Comment 7-116 in Appendix M-5 of the FDR/FEIS with respect to wildlife passages. See response to Comment 4-17 in Appendix M-5 of the DDR/DEIS with respect to deer warning signs.

C 7-16: Use the Highway Beautification Act of 1965 to beautify NYS's highways and help our declining insect population. This decades-old policy would benefit bees and other insects besides beautifying our country. Lady Bird Johnson advocated not mowing the sides of highways, thus letting wildflowers flourish, as part of this act. As the seasons progressed, different flowers would line the roads and connect us to nature. These wildflowers would also attract bees and other insects that are declining in numbers. Resurrecting that policy would have many benefits besides saving on mowing costs.

R 7-16: NYSDOT mows along the interstates to promote safety. Two mowing cycles per year increase sight distance and allow vehicles that swerve off the road an opportunity to recover without impacting a fixed object. Areas that are inappropriate to mow are usually left to regenerate naturally. NYSDOT plants wildflowers and nurtures their growth in numerous places along major highway corridors. In addition, wildflowers are pollinated along the interstate system.

C 7-17: Appendix I-2: Wetland Delineation and Surface Water Assessment Memorandum discusses the Onondaga Creek wetland area along the creek over which the Bear Street bridge passes. The first and second phases of this project include the reconstruction and widening of the Bear Street bridge, an action that could result in a negative impact on the lake sturgeon, a threatened species in New York State.

The existing study presented in the FEIS regarding lake sturgeon focuses on the impact of salinity levels that the construction of new runoff drains will have on the Onondaga Creek. While the increase in salinity levels is not shown to impact the lake sturgeon habitat, it will disrupt the population of mayflies, which are sensitive organisms. The EIS fails to adequately address the impact that the increase in salinity levels will have on mayfly populations along the Onondaga Creek, particularly near the Bear Street bridge. The lack of research that salinity levels could have on mayflies could negatively impact the threatened lake sturgeon population.

R 7-17: NYSDOT and FHWA acknowledge that a healthy macroinvertebrate community within Onondaga Lake and its tributaries is important to maintaining the lake sturgeon population. Mayflies are sensitive to multiple stressors including poor sediment and water quality and in particular organic enrichment that occurs as a result of combined sewer overflow discharges.

The macroinvertebrate community within the portion of Onondaga Creek within Syracuse and within the lake itself has been found to be dominated by pollution-tolerant Oligochaeta and Chironomidae taxa, indicating it does not have the habitat quality necessary to support a healthy mayfly population. Therefore, mayflies are unlikely to represent a substantial portion of the diet of lake sturgeon within Onondaga Lake. As presented in the EIS, the proposed two new stormwater trunk lines would reduce the volume of runoff flowing to the combined sewer system, decrease the frequency and magnitude of overflow events, and reduce organic enrichment within Onondaga Creek and entering Onondaga Lake.

7-7 CONSTRUCTION

C 7-18: What is the current sequencing of construction work to be performed? Would the existing viaduct be demolished prior to the reconstruction of the I-481 bypass? Would it not make more sense to do the bypass work first, then the demolition of the viaduct, to minimize the daily disruption and keep the flow of traffic moving as effectively as possible? What about doing the northbound I-81 tie-in to I-481 at or near the end of the Project?

R 7-18: As explained in Chapter 4, Construction Means and Methods, of the FDR/FEIS, improvements to I-481, including the I-81/I-481 northern interchange (Interchange 29), would be made prior to the demolition of the I-81 viaduct. Refer to Chapter 4 for additional information about construction sequencing.

C 7-19: Based on recent examples of NYSDOT's contractors flouting noise ordinances while working in the area of I-81 Interchange 18, I raise the question about the willingness of public officials to enforce ordinances during the removal of the viaduct and the construction of the Community Grid Alternative and strongly urge establishing an iron-clad mechanism to ensure that residents do not continue to be hurt by such negligence. I suggest putting a sound-proof enclosure on the I-81 working site to make sure that NYSDOT is thoroughly compliant with the letter and the spirit of the Noise Control Act of 1972 and the Quiet Communities Act of 1978.

R 7-19: Contractors will be required to follow the noise protocols outlined in Section 10.11.5 of this ROD.

8 PUBLIC OUTREACH

C 8-1: Due to the volume and complexity of the FDR/FEIS, the public comment period should be extended by 90 days to comply with EPA policy and to give the public the opportunity to seriously review the plan that will determine the future of the community.

Reasons cited include:

1. Public participation is a federal requirement. Recommended practices are described in an EPA publication, "Public Participation Guide." This publication recognizes the decision-making responsibility of the public agency. But it also recommends best

practices for gathering public input from multiple and diverse sources. It concludes, "The job of the sponsor agency then is to balance among these views and concerns and reflect the decisions back so that the public understands how its diverse concerns were considered."

2. The I-81 project is at its most critical step in terms of public participation. The Draft Environmental Impact Statement, released in July 2021, provided the public with DOT's project plan at that date. By October 14, 2021, DOT received 8,000 comments in response to that plan. On February 18, 2022, NYSDOT announced changes to the portion of the plan with the most significant impact on the minority neighborhoods. The change was apparently developed without local consultation with the mayor of the city or the director of the impacted public housing agency. The details of how the Community Grid would link with BL 81 may be buried in the 35,000 pages but they have not been discussed publicly. This major change by itself calls for an extension of the comment period.
3. Issues in the FEIS regarding environmental justice deserve additional public review. The air and noise pollution of thousands of vehicles congested on a street-level roadway close to Dr. King Elementary School and on Syracuse's Southside has not been determined. As a case in point, mitigation factors may be described in the DEIS, but it takes time for the public to find and review such measures, if any.
4. Additional public review may identify the need for plan changes. The comment period after the issuance of the DEIS produced changes that NYSDOT recognized as necessary. In the same way, the FEIS comment period could generate issues that must be addressed to secure the benefits and avoid the errors that could follow a $2.25 billion project. It would be a mistake to shortchange this important process. An extension of months is insignificant compared to the decades that the decision will impact the community, for better or worse.

R 8-1: FHWA and NYSDOT have provided numerous opportunities for meaningful public involvement and considered the comments received on the I-81 Viaduct Project throughout the project development process, starting in the planning stages and extending throughout the environmental review process. These comments have helped shape the I-81 Viaduct Project and have been an important factor in the decision-making process. FHWA and NYSDOT will continue to conduct public outreach and consider comments received throughout construction of the Project. Thus, interested individuals and groups can continue to participate in the Project after the issuance of the Record of Decision (ROD).

FHWA and NYSDOT published the Project's DDR/DEIS in July 2021. The public comment period for the DDR/DEIS, which included both virtual and in-person meetings, was 90 days, which exceeded the required 45 days. NYSDOT and FHWA received more than 8,000 comments during the DDR/DEIS comment period, which were considered, summarized, and responded to in the FDR/FEIS that was published in April 2022. The FDR/FEIS contains much of the same documentation as the DDR/DEIS and text that is new or revised from the

DDR/DEIS is highlighted in the FDR/FEIS to allow for a more efficient review by interested individuals.

Pursuant to federal regulations, FHWA and NYSDOT provided a 30-day review period between the publication of the FDR/FEIS and the ROD. While this 30-day period was not a formal comment period, FHWA and NYSDOT welcomed the submission of comments during this time. New and substantive comments received during the FDR/FEIS review period are summarized and responded to in this ROD. The actual comment submissions can be viewed at https://webapps.dot.ny.gov/i-81-viaduct-project.

Based on the above considerations, FHWA and NYSDOT determined that an extension of the FDR/FEIS review period was not warranted.

C 8-2: In addition to requesting a review period extension citing "the scope of this Project and the fact that we live in, and represent the affected communities and the impact it will have on generations to come," the commenter attached a letter sent by the Onondaga County Legislature and a letter previously sent by the USEPA with their comments on the DDR/DEIS.

R 8-2: See response to Comment 8-1 with respect to a review period extension. See response to Comment 9-62 for a response to the Onondaga County Legislature letter. See responses to Comments 9-226 to 9-241 in Appendix M-5 of the FDR/FEIS for responses to USEPA.

C 8-3: The residents affected by this Project should have a vote on what should be done for this Project. This should not be decided by a few people in Albany!

R 8-3: See response to Comment 8-3 in Appendix M-5 of the FDR/FEIS with respect to voting on the Project.

C 8-4: The decision to adopt the Community Grid Alternative had been decided before the publishing of the EIS. NYSDOT obviously does not want and is not seriously considering our comments.

R 8-4: As documented throughout the DDR/DEIS and the FDR/FEIS, public comments have been considered in the design of the Project alternatives, in the evaluation of environmental impacts, and in the development of the mitigation commitments. Examples of how the Project has evolved as a result of public comments are given in Section 9.4 of the DDR/DEIS and FDR/FEIS.

C 8-5: The community engagement/public participation plan needs to be prepared by community engagement specialists with NYSDOT, not a contractor. NYSDOT's mission is to serve the public and work for the public good; a contractor does not have this as part of its basic mission.

R 8-5: FHWA and NYSDOT have been committed to an open, participatory public engagement for the Project and will continue to inform and solicit ongoing and frequent feedback from the public and from agencies, encourage open discussion of project details and issues, and provide opportunities for comments and questions during final design and construction of the Project. While the various contractors on the Project will develop individual outreach plans for their segments of the Project, these plans will be in keeping with an overall outreach plan, which will be developed by NYSDOT. Implementation of the overall plan will be overseen by NYSDOT.

9 LETTERS FROM ORGANIZATIONS AND AGENCIES

9-1 U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)

C 9-1: The U.S. Environmental Protection Agency (EPA) has reviewed the Final Design Report (FDR)/Final Environmental Impact Statement (FEIS) prepared by the New York State Department of Transportation (NYSDOT) in cooperation with the Federal Highway Administration (FHWA) for the I-81 Viaduct Project in Syracuse, NY (the Project). Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The purpose of the Project is to address structural deficiencies and non-standard highway features while creating an improved transportation corridor through the City of Syracuse. EPA has reviewed the FDR/FEIS, focusing on the Preferred Alternative—the "Community Grid"—along with assessing any changes made since the publication of the Draft Environmental Impact Statement. Our review is consistent with EPA's ongoing work and commitment to support local communities and reduce environmental impacts, especially those with Environmental Justice concerns per Executive Order 12898 (59 FR 7926).

EPA has served as a Cooperating Agency during the development of the FDR/FEIS and in that capacity has provided feedback to FHWA and DOT at multiple coordination points, including through participation at interagency meetings and on comments provided on prior versions of the document. This extensive coordination has resulted in the identification and resolution of many concerns raised by EPA. We acknowledge the updates on the following items:

- The inclusion of a summarized impacts and mitigation chart for each of the alternatives addressed in the FDR/FEIS in the Executive Summary. This will help community members see the potential impacts of each alternative as well as proposed mitigation.
- The relocation of the proposed roundabout from nearby the Dr. King elementary school to Van Buren Street, will minimize impacts to the children.
- The modifications and commitments made by FHWA and NYSDOT to monitor and minimize impacts to air quality and lead exposure to communities.

R 9-1: Comment noted.

C 9-2: We would also like to provide additional comments to be considered in the Record of Decision:

- We recognize Chapter 4 (Table 4-7) addresses NYSDOT's requirement for contractors to implement strict containment and mitigation measures, however, we recommend oversight throughout the process from the lead agency to ensure follow-through on these matters.
  - EPA has a Lead and Asthma Disparities Reduction Task force that can offer assistance to FHWA in development of these measures and plans prior to the demolition phase."

R 9-2: As stated in Section 10 of the ROD, FHWA (through FHWA's Stewardship and Oversight Agreement with NYSDOT) and NYSDOT will oversee and monitor the implementation of the NEPA Environmental Performance Commitments for the Project, which includes the containment and mitigation measures described in Table 4-7 of the FDR/FEIS. FHWA and NYSDOT acknowledge and appreciate USEPA's offer to provide assistance and will coordinate with relevant federal, state, and local agencies throughout final design and construction.

C 9-3: We recommend FHWA adhere to the principles of Environmental Justice when organizing the proposed Land Use Workgroup along with ensuring accessibility to workgroup meetings by an equitable representation of the communities impacted by the proposed action and preferred alternative."

R 9-3: As documented in Section 10 of the ROD, NYSDOT will form the land use working group prior to the initiation of construction. The group will consist of representatives from the city's school district, environmental justice populations, neighborhood residents, and others. Details of the formation and participation of the group have not yet been developed; however, NYSDOT and FHWA are committed to providing meaningful opportunities for participation by environmental justice populations.

C 9-4: When implementing the Lead-Based Paint education program, EPA encourages FHWA to provide materials in multiple languages to ensure accessibility and engage linguistically isolated populations.

R 9-4: As documented in Section 10 of the ROD, NYSDOT will implement the lead-based paint public education program prior to demolition of the existing I-81 viaduct and adjacent structures. Details of the program have not yet been developed; however, NYSDOT will develop the program in consideration of persons with limited English proficiency, consistent with public involvement activities to date.

C 9-5: Based on our review of the FDR/FEIS, we concur with FHWA's assessment of environmental impacts and the proposed mitigation strategies to address these impacts throughout the design, construction, and operation of the Project. We look forward to the receipt of the

Record of Decision and our future interagency collaboration on this and future FHWA-led projects in the New York Division.

R 9-5: Comment noted.

9-2 CITY OF SYRACUSE

C 9-6: This letter is submitted on behalf of the City of Syracuse (the "City") in order to provide comments regarding the Final Environmental Impact Statement (the "FEIS") for the I-81 Viaduct Project, prepared by the Federal Highway Administration (FHWA) and the New York State Department of Transportation (hereafter referred to collectively as the "NYSDOT").

We greatly appreciate NYSDOT's continued recognition of the needs and interests of the City of Syracuse and its residents as the Project progresses. NYSDOT has rightly earned appreciation for its commitment to stakeholder engagement. The Department has not only sought to address transportation priorities but also seized the transformational opportunities of this project for people and neighborhoods.

The greatest challenges lie ahead as we move to the next phase of planning, design, and construction. Protecting the interests of those living closest to the viaduct and realizing the full potential of the Project will require supreme collaboration between NYSDOT, FHWA, and the City, as well as our other municipal and community stakeholders. Syracuse is prepared for this level of partnership.

R 9-6: NYSDOT looks forward to continued partnership and collaboration with the City of Syracuse as the Project moves to final design and ultimately construction.

C 9-7: The City's comments regarding the FEIS follow in accordance with the NYSDOT response to our October 14, 2021 written comments on the DEIS. The City appreciates NYSDOT's decision not to pursue a roundabout in the area of STEAM at Dr. King Elementary School. Even without the roundabout located near Dr. King Elementary, NYSDOT must exercise every possible precaution in planning, design, and construction in the area of the school. The alternative location at Van Buren Street is worthy of further consideration, and the City looks forward to the review of plans and designs for this critical project component.

R 9-7: Construction mitigation measures and commitments are outlined in Section 10 of this ROD. The preliminary plans for the Community Grid Alternative including those for the roundabout at Almond and Van Buren Streets are available for review (refer to Appendix A-1 in the FDR/FEIS). As final design plans are developed, these too will be made available to the City for review.

C 9-8: The City requests that NYSDOT establish and activate the Land Use Working Group during the next phase of project planning rather than waiting for final design prior to construction. Critical issues regarding land use will be impacted by decisions made prior to final design.

R 9-8: The next phase of the Project is the final design phase, which will begin after the issuance of this ROD. The Land Use Working Group will begin toward the end of final design, when parcel acreages are better defined; the actual disposition of property will not occur until after construction. However, conversations about land use in general can proceed anytime during final design as appropriate.

C 9-9: We value NYSDOT's assurances throughout its response to the City's comments that a wide range of matters related to pedestrian safety, cycling, sidewalk width, corner radii, landscaping, tree planting, and public art will be considered during the final design phase (i.e., 9-45 Land Use, 9-50 Public Transit, 9-54 Mid-Block Crossings, 9-63 Catherine Street Design, 9-65 James Street Design, 9-67 Commercial Business District design, 9-68 Public Art, 9-74 Signals, 9-84 Landscaping, 9-85/86 Trees, 9-88 Plantings, 9-84 Maintenance, and 9-95 Wayfinding signage).

Following the City's submission of written comments on the DEIS, the Administration and the Syracuse Common Council committed in late March 2022 to retain the nationally regarded urban and landscape design planning firm Dover Kohl & Partners (DK&P). We are engaging DK&P to develop a "vision master plan" for the Project Area within the City of Syracuse, which includes the areas mentioned above. We request that NYSDOT engage with the City and its partner, DK&P, on an "as required" basis in the weeks and months ahead.

R 9-9: NYSDOT will engage with both the City and its consultant as needed.

C 9-10: The City appreciates NYSDOT's recognition of potential degradation of local road conditions as a result of the Project. The City currently conducts an annual assessment of pavement conditions in association with Syracuse Metropolitan Transportation Council (SMTC). This data should be used for pre- and post-construction work analysis and determination of costs to be applied to the project/contractors.

R 9-10: NYSDOT will make use of the SMTC's assessment as needed. All signed detour routes will be evaluated pre- and post-construction to assure that local roads are maintained in an acceptable condition.

C 9-11: The City is converting South Clinton Street from one-way to two-way from West Jefferson Street to Taylor Street this year. NYSDOT's reference to the conversion south of Jefferson Street until 2026 is not accurate. The City seeks clarification on the timeframe.

R 9-11: NYSDOT will coordinate with the City on the conversion of this section from one-way to two-way.

C 9-12: The City repeats its request to extend reconstruction of City streets to include full blocks. Current proposals indicate reconstruction and streetscape updates will terminate mid-block leaving the City with an inequitable juxtaposition of old vs. new infrastructure.

R 9-12: Refer to response to Comment 9-7 of Appendix M-5 of the FDR/FEIS.

C 9-13: The City appreciates NYSDOT's coordination with the Department of Parks, Recreation and Youth Programs regarding the project impact on Wilson Park. NYSDOT's response regarding the request for a replacement pool and community center is not satisfactory. The City requests the NYSDOT take joint responsibility with the City in identifying, advocating for, and successfully obtaining additional state and/or federal funding to ensure the proper temporary and permanent mitigation is completed at Wilson Park. The health and well-being of children, families, and seniors who rely on Wilson Park for recreation cannot be sacrificed.

R 9-13: FHWA and NYSDOT will fund the improvements to Wilson Park to mitigate the temporary occupancy of 0.12 acres of parkland, which were agreed upon by the officials with jurisdiction over Wilson Park (City of Syracuse Department of Parks, Recreation and Youth Programs and Syracuse Housing Authority). These improvements are described in Section 8 (Section 4(f) Finding) of this ROD. The letters of concurrence from the officials with jurisdiction over Wilson Park are found in Appendix N of the FDR/FEIS.

C 9-14: NYSDOT characterized an "at-grade" or "grade-separated" crossing reconnecting Oakwood Avenue to Oakwood Cemetery as "not reasonable." The City requests that NYSDOT reconsider design alternatives for improving the connection between this historic asset and the community as part of the project.

R 9-14: Refer to response to Comment 9-19 in Appendix M-5 of the FDR/FEIS.

C 9-15: NYSDOT's response indicates that the Department does not have the authority to provide funding for additional fire and police services (i.e., fire station, hazmat and technical rescue resources, more police and firefighter staffing). Both Syracuse Police and Syracuse Fire resources are stretched thin by the current response volumes. Failure to plan for increased response times during construction created by changing traffic patterns and several large construction sites will create a life safety risk that will leave our community in a vulnerable position if unfunded. The City requests that NYSDOT take joint responsibility with the City in identifying, advocating for, and successfully obtaining additional state and/or federal funding.

R 9-15: Refer to responses to Comments 9-27 and 9-33 in Appendix M-5 of the FDR/FEIS with respect to additional fire and police services. NYSDOT cannot take joint responsibility for funding outside the transportation project.

C 9-16: The City requires that the DPW Traffic Management Center is granted access to any cameras installed within the City of Syracuse, regardless of roadway ownership. The Grid will interface with City streets and direct access is needed for movement of the transportation network as a whole.

R 9-16: NYSDOT will work with the City to coordinate access to the cameras as available.

C 9-17: The City requests the NYSDOT reevaluate the design choices for the area along MLK, Jr. East as it relates to the proposed sharrow treatments and instead continue/extend the shared use path to a more logical terminus such as Salina Street or the Creekwalk. A shared use path provides a safer and more accessible facility for students and users of all ages over the proposed sharrow treatments.

R 9-17: Refer to responses to Comments 9-40 and 9-149 in Appendix M-5 of the FDR/FEIS with respect to the shared vehicle/bicycle lanes at MLK, Jr. and Leon Street. As explained in the response to Comment 4-109 in Appendix M-5 of the FDR/FEIS, separate bicycle facilities are preferred and provided when right-of-way is available; when these cannot be accommodated, shared vehicle/bicycle lanes are provided.

C 9-18: The City asserts that a determination that only certain areas are eligible for noise barriers and related treatments is not an acceptable outcome for residents and properties adjacent to the State highway. Noise issues are amplified in the core area where hardscape coverage is higher and physical separation is reduced due to the nature of the built environment. NYSDOT should provide noise barriers for I-690, I-81, and BL 81 at all possible locations outside of the street level “Grid” area and provide non-traditional noise mitigation and other interventions where “traditional” mitigation measures have been deemed not applicable.

R 9-18: The traffic noise analysis for the Project was conducted in accordance with FHWA noise regulations (23 CFR 772) and NYSDOT Noise Policy. As documented in Chapter 6, Section 6-4-6 (Noise) of the DDR/DEIS and FDR/FEIS, noise abatement measures were considered for the areas that were identified as impacted. These measures included traffic management measures (prohibition of vehicle types and time-use restrictions, modified speed limits, and exclusive lane designations), alteration of horizontal and vertical alignments, acquisition of real property to serve as a buffer zone, noise insulation of buildings, and the construction of noise barriers. As a result, 15 noise barriers were found to be both feasible and reasonable and are recommended for construction. Other locations with noise impacts did not meet the criteria for feasible and reasonable noise abatement.

C 9-19: Maintenance of scattered segments of pedestrian and bicycle facilities of differing designs will produce an unnecessary hardship on the City due to maintenance obligations. These items should form a connected and standardized system to facilitate proper year-round maintenance. Multiple comments have been provided regarding the need for continuous and consistent bicycle and pedestrian accommodations.

R 9-19: The Project’s proposed bicycle improvements were developed in keeping with the Syracuse Bicycle Plan, as well as in consideration of public comments. In keeping with the Project objectives, the design includes facilities where deficiencies exist and considered both existing and future improvements to be made by the City, as identified in the bike plan. Within the Project limits, the current preliminary design provides continuous sidewalks on both sides of the street except for select locations where a safety concern was identified (e.g., next to a proposed highway ramp).

C 9-20: The City asserts that the reconfigurations of Bear Street, Clinton Street, Pearl Street, Oswego Boulevard, Harrison Street, Adams Street, and other corridors provide safe accommodations for all expected modes of travel, which includes cyclists. Designing areas that are part of the street grid as inaccessible spaces to certain modes of travel is not an acceptable outcome and fails to meet both project goals and fairly treat City residents who do not drive motor vehicles.

R 9-20: Similar to the response to Comment 9-17 above, all modes of transportation have been considered in providing safe accommodations.

C 9-21: The City seeks further clarification regarding the apportionment of responsibility for damage to sewer and water infrastructure as a result of the Project. Such damage, however, often does not present in the immediate timeframe of a project. The City and NYSDOT must agree on more specific terms to ensure NYSDOT and/or its contractors are properly accountable for damage to city infrastructure. Reasonable actions include NYSDOT conducting camera analysis of sanitary and storm sewer facilities and completion of pressure testing and sounding of water infrastructure.

R 9-21: Per NYSDOT's practices and procedures, any City facilities that are impacted by the Project will be replaced in kind. In instances where infrastructure is inadvertently damaged during construction, the State will bear the repair cost. The City has the option of funding the replacement of utilities not impacted by the Project through the betterment process.

C 9-22: The City repeats its request regarding Onondaga Creek stormwater outfalls: "NYSDOT must base hydraulic analysis of Onondaga Creek stormwater outfalls on the existing conditions of the Creek and its existing capacity (with sediment and existing conditions of creek channel walls, banks, etc.). NYSDOT should complete this analysis as soon as possible to verify that the system works. NYSDOT must also demonstrate that there will be no adverse impacts to the Creek including, but not limited to, erosion of soil and sediment along the creek bank and creek bed, changes in creek capacity, and disruption of recreational use of the Creek." The City requests that NYSDOT complete or commit to completing this analysis to verify that there won't be adverse impacts to the creek channel and flood zones.

R 9-22: As presented in Section 6-4-7, Water Resources of the FDR/FEIS, the new separated drainage system consisting of large diameter storm sewer trunk lines along I-81 and I-690 will be subject to NYSDEC and USACE permit requirements. To obtain the required permits, a detailed hydraulic analysis will be conducted during final design to demonstrate that project development will not result in adverse impacts to the downstream watercourses and any designated floodplains. The new 96-inch (8-foot) outfall for the stormwater trunk line servicing the area east of Onondaga Creek will be located in the existing bank of Onondaga Creek. The invert of the outfall will be 1.6 feet above the Onondaga Creek stream bed at the outfall location. During low flow conditions, the top of the water surface is at 1.9 feet above the creek bed and therefore the pipe will contain some backwater for a short distance. The top of the outfall will be below the mean high-water line. Therefore, discharge from the outfall

will not result in a head drop and will have minimal erosive impact on the stream bed and stone wall banks. The sewer trunk will be located on an outside meander bend of Onondaga Creek, at an angle that will direct the flow from the outfall towards the far bank, which will reduce the potential for erosion of the bed and banks. The new 42-inch (3.5-foot) outfall for the stormwater trunk line servicing the area west of Onondaga Creek will be located in the existing embankment of the Onondaga Creek floodplain, on the opposite shore from the 96-inch outfall. The invert of the outfall will be between 15 and 20 feet above the Onondaga Creek stream bed at the outfall location (exact location to be determined during final design). Protection from erosion will be provided by the construction of an energy-dissipating structure and bank stabilization measures. The energy dissipating structure will be designed during final design and will meet the requirements of NYSDOT's Geotechnical Design Procedure: Bank and Channel Protective Lining Design Procedures.

C 9-23: The City notes for the record that its current maintenance agreement with NYSDOT for landscape maintenance is unsatisfactory and must be re-negotiated during the final design phase.

R 9-23: NYSDOT will enter into a new maintenance agreement with the City prior to the completion of construction.

C 9-24: Proper placement of trees, shrubs, and grasses to trap ground level pollutants mitigates the traffic-related health impacts. The City requests that addressing tree planting details and specifications not await the final design phase but rather be considered as part of the work being conducted under the Syracuse Urban Forest Master Plan and under the scope of work and charge to City master planner, Dover Kohl & Partners.

R 9-24: These details will be worked out during the final design phases, which begin with the issuance of this ROD.

C 9-25: The City requests that NYSDOT engage the City of Syracuse and its Traffic Control technician to conduct a complete mapping of the City of Syracuse fiber-optic lines.

R 9-25: This request is outside the Project scope.

C 9-26: The City supports the designation of the Business Loop 81 on the Almond Street corridor, inclusive of the "freeway" portions of the highway to the north and south of Almond Street. NYSDOT cites multiple sources in federal transportation law regarding the importance of a 12-foot lane (see also R 4-43 and 4-71), including the following statement: "Critical design elements, including lane widths, for these functional classifications must meet the minimum criteria established by the NYSDOT Highway Design Manual, Chapter 2. FHWA mandates that the minimum lane width for Qualifying Highways is 12 feet (r 4-71)."

Recognizing this factor, the City underscores the importance of NYSDOT's commitment in R 9-80, "NYSDOT will work with the City of Syracuse and appropriate stakeholders during the final design phases to refine the design of the areas of Almond Street outside the curb

lines, including widths of the medians and pedestrian refuge areas, cycle track, shared use lanes, and sidewalks, etc. The refinements to Almond Street would be designed to be consistent with the City's vision and the needs and objectives of the Project." We formally request, however, that this coordination with the City not wait for final design but instead occur on an "as needed" basis with the City and its master planner, DK&P.

If 12' travel lanes are to remain in the final design [on the City street section of BL 81], the City requests that NYSDOT perform quarterly (4X per year) speed counts on all blocks being designated BL 81 and Qualifying Highways, as soon as the reconfigured roadways are opened to traffic. This data is to be shared with the City, and if any areas have an average speed greater than 30 MPH the City requests that NYSDOT reconfigure the roadway to produce an average travel speed of 30 MPH. Once the roadway has achieved average speeds of 30 MPH it should be reevaluated every six months for 5 years to ensure no additional changes are required. The use or suggestion of police enforcement as a solution to curbing speeds will not be accepted as this is not a permanent design solution.

R 9-26: As explained above, the final design phases begin with the issuance of this ROD. Regarding speed counts, in practice, average speeds are not used to determine speed limits. NYSDOT utilizes the 85th percentile speed based on free flow conditions, which are difficult to obtain in an urban area. Our experience has shown that in an urban corridor, with various traffic calming measures such as on-street parking, sidewalks, and landscaping as well as the regular crossing of pedestrians and bicyclists, speeds do not generally go much higher than 30 mph. NYSDOT also plans to implement adaptive signal technology, which will allow us to monitor and meter traffic as well.

C 9-27: The City requests further, well-defined clarification of NYSDOT criteria for determining utilities "impacted" by the Project. The City requests that NYSDOT, within funding requirements, recognize the impact of the project on infrastructure adjacent to the immediate Project Area. Water main breaks, in particular, as a result of the construction activity in this project, will be a large expense for the City during the course of this project and will have a large impact on the daily operations of the water department, along with supplying water to critical community service entities (i.e., hospitals, community centers, higher education, medical offices).

R 9-27: See response to Comment 9-21, above.

C 9-28: The City requests further, well-defined clarification of NYSDOT criteria for determining whether the 24-inch water main on Hiawatha Boulevard is "impacted" by the Project.

R 9-28: Based on current information, NYSDOT believes that impacts to this water main can be avoided; however, NYSDOT will obtain more precise information regarding the depth of the existing facility to confirm this assumption and coordinate with the City as appropriate.

C 9-29: The City requests NYSDOT provide dedicated cycling infrastructure, not shared use lanes or "sharrows." Sharrows do not provide safe and comfortable accommodations, nor is it appropriate for a multi-billion-dollar project to propose such low cost and low-impact interventions while expecting City streets to help disperse motor vehicle traffic related to the NYSDOT owned highway. The City requires physically protected cycle tracks and shared use paths for our cyclists who are some of the transportation system's most vulnerable users, and who stand to suffer irreparable harm from substandard infrastructure as proposed.

R 9-29: Refer to response to Comment 9-17 above.

C 9-30: In addition to the responses specifically addressed here, the City further notes its continuing high expectations for NYSDOT's performance in ensuring hiring goals for local and disadvantaged workers are uniformly met by the Department contractors. We have valued NYSDOT's active participation in the Interstate 81 Jobs Big Table and support in achieving local hiring on federal infrastructure projects. The reality, however, is we have only passed the first "gate" in ensuring City of Syracuse residents find careers and a path out of poverty as a result of the project. Our work together in this area must continue.

It is exciting to know that construction on the Community Grid will begin this year. It will, undoubtedly, be a demanding project. By working closely together at the federal, state, and local level, we can achieve its potential for generations to come.

R 9-30: NYSDOT is committed to collaborating with the City on the formation of local hiring initiatives across the multiple construction contracts for the Project.

9-3 FAMILIES FOR LEAD FREEDOM NOW! AND SIGNATORIES

C 9-31: We write with appreciation for the hard work at NYSDOT and FHWA assisting with the I-81 project. Together, you are bringing us closer to the ground-breaking removal of the I-81 viaduct, and the construction of the preferred option the Community Grid, a conclusion all signatories to this letter support.

Today, we join together with numerous community organizations and concerned physicians as one collective voice demanding the highest safety and health protections for workers and nearby residents during demolition of the I-81 viaduct that go beyond, but are consistent with, current regulations.

As we believe you have heard, our major concern is the potential for lead exposure to nearby residents and workers during construction. Lead is a neurotoxin. Just one small sugar packet's worth of lead can injure children for a lifetime. For years, we have witnessed the cracking, peeling paint on I-81's steel beams. Lead exposure is a real threat in this community and a central question must be addressed: "When I-81 comes down, will lead levels go up?" This real possibility is particularly alarming because childhood lead poisoning is already a devastating environmental disease in our community.

We are hopeful that lead poisoning can be avoided if NYSDOT takes proper measures now to ensure that health and safety come first. We believe this means NYSDOT should outline a specific plan for the health and safety of both bridge demolition workers and nearby residents, consistent with the items in this letter.

Now is the time to create the opportunity to ensure the right health and safety measures are implemented. We urge NYSDOT to adopt, at a minimum, the following set of five (5) practical safety and health measures, which we seek to discuss further in a meeting with NYSDOT.

Health Impact Assessment (HIA). The HIA, which integrates health considerations into transportation planning decisions, is an important tool for public health on infrastructure projects. Its value is recognized by the Centers for Disease Control. We call upon NYSDOT to work with the appropriate stakeholders on an HIA for the I-81 demolition.

Independent Safety and Health Workplace Monitor. Standard industry practice today is for a demolition Contractor not only to follow the best practices of a Lead Exposure Control Plan, but to hire an Independent Monitor with experience in keeping workers safe. We call on NYSDOT to establish an independent safety and health workplace monitor to ensure that bridge demolition work will prevent toxic lead poisoning of workers.

Jointly designed Lead Exposure Control Plan (LECP). In addition to ensuring that OSHA standards are observed, an LECP should include protective measures for nearby residents, particularly children within a half-mile radius from potentially airborne lead dust. This requires input on the LECP from community stakeholders.

Funding for a "Health Care–NYSDOT–Community" Partnership. Public health education of nearby residents about upcoming demolition, including the risks and safety measures they can take, should be a priority. Testing and monitoring of air, soil, and childhood blood-lead levels should take place regularly. Great examples of proactively addressing lead and public health concerns can be found in places such as Boston-Chelsea, MA (https://www.nejm.org/doi/full/10.1056/ NEJM198203183061112), and Cincinnati, Ohio (https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5692160/), which instituted something similar for nearby residents.

R 9-31: Please see responses to Comments 7-6 and 9-302 in Appendix M-5 of the FDR/FEIS with respect to conducting a Health Impact Assessment (HIA) for the Project. Please see responses to Comments 9-303, 9-307 and 9-310 in Appendix M-5 of the FDR/FEIS with respect to testing and monitoring of air, soil, and childhood blood-level levels.

As documented throughout the FDR/FEIS, NYSDOT has developed and designed the Project in consideration of public health. Furthermore, NYSDOT and FHWA will prioritize worker and public health and safety throughout construction. Section 10 of the ROD describes the multitude of measures that will be taken prior to and during construction related to worker and public health and safety. These measures include, but are not limited to, the following:

- Implement an outdoor ambient air quality monitoring program;
- Coordinate with the Onondaga County Health Department and interested health-based community organizations and implement a lead-based paint public education program;
- Designate an appropriately qualified and experienced monitor to oversee the implementation of and compliance with the construction commitments related to worker and public health and safety;
- Specify Class B containment (NYSDOT Standard Specifications Subsection 570-3.07) and a minimum grade, impermeable tarpaulin enclosure material for all manual and shrouded power tool paint removal work;
- Specify minimum required levels of personal protective equipment (PPE), respiratory protection, and personal decontamination for all manual and shrouded power tool paint removal work; and
- Perform continuous ambient real-time particulate air quality monitoring adjacent to all Class B containment work involving manual and shrouded power tool paint removal work along the entire I-81 viaduct.

C 9-32: Conference with Officials from the Environmental Protection Agency (EPA). The EPA is a primary federal monitor of Environmental Justice issues. The I-81 viaduct demolition will occur adjacent to an environmental justice community that has suffered for decades. NYSDOT and/or FHWA should work with EPA to bring together NYSDOT officials and community stakeholders to create a plan that fully addresses the community's health and safety concerns.

R 9-32: As a Cooperating Agency, USEPA has participated in the environmental review process for the Project. Please see Chapter 9, Section 9.2.2 (Cooperating and Participating Agencies) of the FDR/FEIS and USEPA's comment letter, dated 5/12/2022, on the FDR/FEIS. FHWA and NYSDOT have coordinated and will continue to coordinate with relevant federal, state, and local agencies, including USEPA, throughout final design and construction.

C 9-33: We are sure you agree that we should all be concerned for the children who live and play near the I-81 viaduct, the students who might be attending STEAM at Dr. King Elementary School during demolition, and the children who will be exposed to the lead hazards of bridge demolition.

We urge all public officials to work with community stakeholders to avoid the potentially toxic traps of bridge demolition by building a strong bridge to safety and health for our workers and nearby residents.

R 9-33: Comment noted. NYSDOT held a meeting with this organization regarding their concerns on May 17, 2022.

9-4 UPSTATE MEDICAL UNIVERSITY, OCCUPATIONAL HEALTH CLINICAL CENTER (OHCC)

C 9-34: I-81 Take Down and Reconstruction Project - Community Grid Plan

In the experience of OHCC, on any project there are pressures to coordinate work that places occupational safety and health in jeopardy. With regard to lead, there are worries that exposure could lead to the removal of the entire work crew. Often workers simply believe that lead exposure is just part of the job. Engineering concerns, project timetables, and other factors reduce the likelihood that health and safety protocols will be followed.

Barriers to lower exposures include financial pressures. There are clearly higher costs associated with time and materials necessary for the appropriate controls. There would also need to be the ability and willingness to apply research to provide new solutions. There are political pressures and industry influence regulation (for example, the OSHA standards can take decades to develop).

For the I-81 take down and reconstruction using the Community Grid plan, we have before us a unique set of conditions. First of all, it's rare to undertake such extensive demolition. The work is unprecedented and not everything can be known ahead of time. We cannot rely on learning solely from experiences of other similar projects. They are rare and each have unique features. Secondly, this community is already over exposed to lead. So, it is imperative that we don't add to the burden of toxicity in any measure. Finally, it should be pointed out that the I-81 Round Table has listened to and responded to the community in a number of ways. For example, local jobs have been promised and conditions are good for that promise to be upheld. Therefore, it's highly imperative that when finally planning for local residents to be included in financial opportunities inherent in the provision of jobs for the project we ensure the jobs are safe jobs.

R 9-34: NYSDOT and FHWA will prioritize worker and public health and safety throughout construction. Section 10 of the ROD describes the multitude of measures that will be taken prior to and during construction related to worker and public health and safety. As stated, FHWA (through FHWA's Stewardship and Oversight Agreement with NYSDOT) and NYSDOT will oversee and monitor the implementation of these commitments for the Project.

C 9-35: FEIS Response: Concerns about Lead Exposures

NYSDOT will require the contractors to develop the Lead Exposure Control Plan in accordance with OSHA Lead Standard (page 6-552), however, there is no indication that there will be any coordination/oversight among the various contractors of the projects, no assurance that these plans will be expertly developed, and no timeline stated.

R 9-35: Separate contractors may be selected for the various contracts that will be necessary to construct the Project. NYSDOT is the responsible entity to ensure that the Lead Exposure Control Plans are followed and implemented to protect worker and public health and safety. In addition, as stated in Section 10 of the ROD, NYSDOT will designate an appropriately qualified and experienced monitor to oversee the implementation of and compliance with the construction commitments related to worker and public health and safety.

C 9-36: NYSDOT will require the contractors to develop the Lead Exposure Control Plan in accordance with OSHA Lead Standard (page 6-552), however, the OSHA Standard is outdated and does not adequately protect workers from deleterious health impact. It should not be considered “best practice.”

R 9-36: As stated in Section 10 of the ROD, NYSDOT will commit to specifying a maximum worker blood level of 30 micrograms per deciliter (ug/dl) where an action is triggered, such as medical testing or allowance to return to work. This level is 10 ug/dl less than the current U.S. Occupational Safety and Health Administration (OSHA) standard.

C 9-37: There will be a number of contractors and subcontractors carrying out their own lead exposure control plans without oversight. Current enforcement of OSHA is weak (penalties are fairly low and are do not always "stick"). So, there may not be enough deterrents in place to avoid lack of compliance even when all intentions to comply are clear.

R 9-37: As stated in Section 10 of the ROD, FHWA (through FHWA’s Stewardship and Oversight Agreement with NYSDOT) and NYSDOT will oversee and monitor the implementation of the environmental commitments for the Project, including the containment and mitigation measures related to lead-based paint. In addition, as stated in Section 10 of the ROD, NYSDOT will designate an appropriately qualified and experienced monitor to oversee the implementation of and compliance with the construction commitments related to worker and public health and safety.

C 9-38: Lead Abatement will be in accordance with DOT standard specifications for lead removal operations (page 6-546). Where are these specifications written? What custom plan will be developed for overall coordination? What assurances do we have that these specifications have been effective in the past or will work under these unique conditions?

R 9-38: NYSDOT Standard Specifications Section 570 covers paint removal operations and disposal. Section 10 of the ROD describes the additional mitigation measures related to lead-based paint that have been developed specific to the I-81 Viaduct Project. Each contractor will be required to submit a Safety and Health Plan to NYSDOT for approval prior to implementation.

C 9-39: A series of topics related to lead exposure to the environment are mentioned on page 6-551, paragraph 6. We appreciate that these topics are being raised and there is an implication that they will be addressed according to 40 CFR 745.227. However, there are no details given, no timeline, no data collection mechanisms, no reporting structure, and no locations nor any indication of who will be conducting any of these activities, nor who is ultimately responsible for the health and safety outcomes. How will 40 CFR 745.227 be applied? Where? By whom?

R 9-39: Please see the response to Comment 9-303 in Appendix M-5 of FDR/FEIS. NYSDOT is the responsible entity to ensure that 40 CFR 745.227 is followed.

C 9-40: Regarding the LBP Public Education Program (page 6-553), throughout the FEIS, NYSDOT repeats that an LBP Public Education Program will be developed in coordination with the Onondaga County Health Department.

a) What expertise is housed at the Onondaga County Health Department to address occupational safety and health? Who will be evaluating the content (including breadth and depth) of the material?

b) What expertise is housed at the Onondaga County Health Department on creating community-based education design with language access, diversity and inclusion, and maximum coverage of those living closest to and working on the demolition work?

c) What capacity does the Onondaga County Health Department possess for taking on this herculean task?

d) Primary prevention requires mitigation at the source, so measures to be taken to prevent the spread of contaminated dust into homes should NOT be placed as a burden on the community.

e) What expertise will be called upon to build trust in the community for community-based meetings?

f) Creating a hotline, a website, and distributing fact sheets or pamphlets are clearly needed, however, they will be only partially effective. Other methods should be considered.

R 9-40: NYSDOT cannot speak to the workforce capacity or expertise of the Onondaga County Health Department, which is a nationally accredited local public health agency with responsibility for protecting and improving the health of county residents. As stated in Section 10 of the ROD, NYSDOT will coordinate with the Onondaga County Health Department and interested health-based community organizations and implement a lead-based paint public education program prior to the demolition of the existing I-81 viaduct and adjacent structures. Potential activities could include the development of educational materials on household protocols to prevent the spread of contaminated dust into homes, providing tacky mat kits and instructions for use to local residents, and holding a community session/meeting focused on demolition and ways to protect residents from lead dust during construction. NYSDOT will develop the program in consideration of persons with limited English proficiency, consistent with public involvement activities to date. NYSDOT and FHWA are committed to providing meaningful opportunities for participation by environmental justice populations.

C 9-41: There has been no clear discussion about the role of the NYS DOH, NYS DOL, OSHA, and possibly other governmental entities. How will these agencies interact together to protect worker and community health during the project? 8. Statement made on M-5, page 283, "Addressing possible atmospheric deposits in undisturbed soils or lead blood levels in children is beyond the scope of this Project." is problematic. NYS DOT and NYS DOH, among others, must consider the public's health and work jointly to protect it.

R 9-41: Please see the response to Comment 9-312 in Appendix M-5 of the FDR/FEIS. FHWA and NYSDOT will coordinate with relevant federal, state, and local agencies throughout final design and construction. Please see responses to Comments 9-303, 9-307, and 9-310 in Appendix M-5 of the FDR/FEIS with respect to testing and monitoring of air, soil, and childhood blood-lead levels.

C 9-42: CONCLUSIONS

The community has a right to protect itself and ask for more specifics, better research, higher standards and to have more opportunities to ask questions before, during, and after the project is underway.

With regard to oversight, the community has a right to request and obtain details in a timely manner on all matters related to occupational safety and health. Occupational health is inextricably linked to community health.

1. What kind of independent oversight of the contractor is going to happen?
2. How will reporting back take place?
3. Do you have any lead protection plans from other projects?
4. Show us documentation of your protocols on other projects, especially with details regarding the outcomes?

Although the FEIS does begin to address exposure to workers and the community, it does not come far enough. The following recommendations possess the vision and effectiveness necessary to achieve the health protections workers and members of the community deserve.

Occupational Health = Public Health.

We have a fundamental mission that we must not lose sight of amidst a huge project to transform our community for the better. That is, to make sure that at the end of the day workers come home to their families safe and sound. We need this new transportation infrastructure and local people need these jobs, but not at the expense of worker health or keeping kids who live nearby safe. If you had a family member or a friend exposed to high blood lead levels, you would want to see immediate action taken to reduce that exposure. The health and safety of all workers should be the top priority.

The raising of this highway in the first place created deeply troubling social injustice/racial discrimination.

More than 50 years ago, the Interstate 81 viaduct ripped through a working-class Black neighborhood in Syracuse. It displaced long-time residents and ensured that poverty, pollution, and a lack of resources would hurt the community that lived in the highway's shadow that still persists today.

Children in Syracuse are already at risk due to housing conditions perpetuated by irresponsible landlords. These children are already suffering an environmental injustice. We

are raising the question here: What is being done to address overlapping health vulnerabilities now so that history does not repeat? What is the role of the NYSDOT in protecting workers and the community?

R 9-42: As documented throughout the FDR/FEIS, NYSDOT has developed and designed the Project in consideration of public health. Furthermore, NYSDOT and FHWA will prioritize worker and public health safety throughout construction. Section 10 of the ROD describes the multitude of measures that will be taken prior to and during construction related to worker and public health and safety, including the commitment that NYSDOT will designate an appropriately qualified and experienced monitor to oversee the implementation of and compliance with the construction commitments related to worker and public health and safety. NYSDOT will continue to coordinate with Upstate regarding potential examples from other NYSDOT projects.

C 9-43: ELEMENTS FOR A PUBLIC HEALTH APPROACH WITH OVERSIGHT AND INTERAGENCY COOPERATION

Health Impact Assessment (HIA). The HIA, which integrates health considerations into transportation planning decisions, is an important tool for public health on infrastructure projects. Its value is recognized by the Centers for Disease Control. We call upon NYSDOT to work with the appropriate stakeholders on an HIA for the I-81 demolition.

R 9-43: Please see responses to Comments 7-6 and 9-302 in Appendix M-5 of the FDR/FEIS with respect to conducting a Health Impact Assessment (HIA) for the Project.

C 9-44: Independent Safety and Health Workplace Monitor. Standard industry practice today is for a demolition contractor not only to follow the best practices of a Lead Exposure Control Plan, but also to hire an Independent Monitor with experience in keeping workers safe. We call on NYSDOT to establish an independent safety and health workplace monitor to ensure that bridge demolition work will prevent toxic lead poisoning of workers.

R 9-44: NYSDOT will designate an appropriately qualified and experienced monitor to oversee the implementation of and compliance with the construction commitments related to worker and public health and safety.

C 9-45: Jointly designed Lead Exposure Control Plan (LECP). In addition to ensuring that OSHA standards are observed, an LECP should include protective measures based on current recommendations in the field of occupational health, raising the bar on occupational safety and health for local workers. In addition, nearby residents, particularly children within a half-mile radius from potentially airborne lead dust, should be included in all protective measures. The community should have greater input on LECP, especially coordinating and creating uniform standards across contractors.

R 9-45: Please see response to Comment 9-303 in Appendix M-5 of the FDR/FEIS.

C 9-46: Funding for a "Health-NYSDOT-Community" Partnership. As has been done in other cities for large highway projects, public health initiatives should be comprehensive and include:

- education of nearby residents about upcoming demolition, including the risks and safety measures they can take, should be a priority
- testing and monitoring of air, soil, and childhood blood-lead levels should take place regularly in accordance with the findings of the Health Impact Assessment (HIA).

R 9-46: NYSDOT will coordinate with the Onondaga County Health Department and interested health-based community organizations and implement a lead-based paint public education program. NYSDOT will designate an appropriately qualified and experienced monitor to oversee the implementation of and compliance with the construction commitments related to worker and public health and safety.

Please see responses to Comments 9-303, 9-307, and 9-310 in Appendix M-5 of the FDR/FEIS with respect to testing and monitoring of air, soil, and childhood blood-levels.

C 9-47: Conference with Officials from the Environmental Protection Agency (EPA). The EPA is a primary federal monitor of Environmental Justice issues. The I-81 viaduct demolition will occur adjacent to an environmental justice community that has suffered for decades. NYSDOT and/ or FHWA should work with EPA to bring together NYSDOT officials and community stakeholders to create a plan that fully addresses the community's health and safety concerns.

R 9-47: As a Cooperating Agency, USEPA has participated in the environmental review process for the Project. Please see Chapter 9, Section 9.2.2 (Cooperating and Participating Agencies) of the FDR/FEIS and also USEPA's comment letter, dated 5/12/2022, in the FDR/FEIS. FHWA and NYSDOT will coordinate with relevant federal, state, and local agencies, including USEPA, throughout final design and construction.

9-5 NEW YORK CIVIL LIBERTIES UNION (NYCLU)

C 9-48: The New York Civil Liberties Union (NYCLU) has been deeply involved in the I-81 public participation process to ensure that the Black community living in the shadow of the I-81 viaduct does not suffer further harms from its reconstruction and redevelopment. While we commend the NYSDOT on its adoption of several important recommendations advanced by the NYCLU and others, we have deep concerns that NYSDOT continues to ignore the health needs of the environmental justice community.

R 9-48: Comment noted.

C 9-49: NYCLU Advocacy History. As we have identified in our previous communications to you regarding this project, the original construction of the I-81 highway razed a Black community, displacing thousands of people, and demolished over 500 homes and businesses. The NYCLU is committed to a reconciliation of past harms caused by the highway and ensuring

equitable distribution of benefits to the most impacted community. See Building A Better Future: The Structural Racism Built into I-81 and How to Tear it Down. (Attached Ex. A).

Our Report, Building A Better Future, is a comprehensive analysis of the multi-generational racial and environmental impact of the I-81 overpass in Syracuse and was written in deep collaboration with residents of the environmental justice community. The report expressly supports the removal of the viaduct and explains how the redevelopment proposal can avoid repeating the mistakes of the past.

R 9-49: See response to Comment 9-258 in Appendix M-5 of the FDR/FEIS.

C 9-50: In addition, the NYCLU submitted comments on the Draft Environmental Impact Statement ("NYCLU DEIS public comment"), see attached Ex. B, in which the NYCLU reiterated its support for the demolition of the raised viaduct. We also raised concerns with NYSDOT's conclusion that the environmental justice community—primarily Black neighborhoods adjacent to the viaduct—will not be impacted by the I-81 Project. The impacts we highlighted include exposure to increased air pollution, lead, fugitive dust, and the disposition of land that will become usable as part of the reconstruction and its contribution to displacement in this predominantly Black and low-income neighborhood. Our public comment highlighted this confluence of indirect and direct effects that must be addressed to prevent the past from repeating itself. Addressing these direct and indirect effects is aligned with the Biden Administration's renewed dedication to racial and environmental justice. As President Biden's executive orders set forth, the administration is committed to undoing the harms of environmental racism and advancing racial equity and support to underserved communities.

R 9-50: See responses to Comments 9-253 to 9-257 in Appendix M-5 of the FDR/FEIS.

C 9-51: Throughout this process, the NYCLU worked with the environmental justice community to collect postcards that captured their concerns about the project. Our partnership with the community led to the submission of over 5,000 public comments via NYCLU postcards. These comments reiterated the need for protections for the communities most vulnerable during construction, the safeguarding of future land use in the footprint of the project, the prevention of displacement from this project, and ensuring jobs go to impacted residents.

R 9-51: Comment noted.

C 9-52: Community Advocacy Achievements.

We are pleased that the NYSDOT has responded to and adequately addressed many of our concerns in the FEIS. For example, in the DEIS public comment we raised concerns with air quality and monitoring in the environmental justice community. The NYSDOT committed in the FEIS to locate a monitor outdoors in the vicinity of STEAM at Dr. King elementary school. In addition, NYSDOT will create an outdoor ambient air quality monitoring program to be implemented during construction of the Project and overseen by NYSDOT (Chapter 4 (Table 4-7), Section 6-2-3, and Section 6-4-4 of this FDR/FEIS).

The NYSDOT also reconsidered and moved the roundabout location as a result of the community's sustained advocacy (see NYCLU DEIS Part I Section c). The NYCLU, alongside coalition partners and community members, held a march and rally to protest the siting of the on and off ramp. In response to the community's concerns, NYSDOT is no longer proposing a roundabout at MLK, Jr. East. The new roundabout proposed at Van Buren Street is sufficiently more than 600 feet from STEAM at Dr. King elementary school. Furthermore, we commend the NYSDOT moving the roadway further east, and it no longer intersects with MLK Jr., East (see FEIS Sections 6-4-4.1 and 6-4-4.2). We appreciate this partnership and commend the NYSDOT reconsideration.

R 9-52: Comment noted.

C 9-53: Finally, in response to the concerns over future land use highlighted in hundreds of public comments submitted by the NYCLU, we commend the NYSDOT for committing to establish a Land Use Working Group during final design prior to the start of the construction phases (Appendix M-5 Responses, R 9-257A). The NYSDOT stated the purpose of the Land Use Working Group is to work with the community and interested stakeholders such as NYCLU, SHA, Syracuse School District, and others in developing the framework for use of potential surplus property. (Id). This a good start toward achieving an equitable outcome of the I-81 Project.

We support the NYSDOT plan to review the surplus land and to divest its real property interest to a grantee (R 9-257). Doing so will promote the equitable transfers of the four acres of land adjacent to STEAM at Dr. King elementary school, MLK into a Community Land Trust for the Black community. However, we reiterate the need for the NYSDOT to transfer these four acres of land to the City of Syracuse with a contingency that the land must be developed into a community land trust, and provide resources, oversight, and development by residents living adjacent to the I-81 viaduct.

R 9-53: Please see the response to Comment R 9-257 in Appendix M-5 of the FDR/FEIS.

C 9-54: More Work To Be Done.

There are some conclusions by the NYSDOT that remain unchanged and that will harm the community. We are gravely concerned about the NYSDOT's inexplicable conclusion that "the community will not be impacted by construction." The report and the comments submitted make clear that this is not based in fact. Only by ignoring the health needs of the environmental justice community could the NYSDOT come to this conclusion.

Numerous commentors are asking for more protections during construction. For example, "Pioneer Homes resident Tara Harris proceeded to say she has a doctor's note, which stated that her respiratory health would be negatively impacted by living so close to a construction site and her doctor advised her to relocate" to which NYSDOT responded: "considering health conditions of residents is outside the scope of this project." Similarly, the Syracuse Common Council President presented a question to NYSDOT representative "what is

preventing the NYSDOT from doing a health needs assessment?" She went on to say, "the community needs health protections." The NYSDOT simply responded by saying "Highway law." This is not a satisfactory response when people's ability to protect themselves is compromised.

Specifically, we are concerned with lead exposure. Clearly, demolishing a viaduct with decades of embedded lead from paint and gasoline in conjunction with other particulate matter will exacerbate the already high rates of lead poisoning in this Black neighborhood. In the NYCLU's DEIS public comment, we identified that Black children in Syracuse have some of the highest rates of lead poisoning in the nation (see NYCLU DEIS comments at Section I-part a). We raised concerns about protecting them from construction lead by conducting a health needs assessment. But the FEIS does not address any of these concerns, leaving all questions of lead protection to an unspecified "set of construction mitigation measures and best practices for the Project" (see Appendix M5, R 9-254 (see Table 4-7 of this FDR/FEIS)).

Instead of the specific attention and mitigation to the predominately Black neighborhood adjacent to the viaduct required by Title VI, the NYSDOT relies on "the Contractors…Lead Exposure Plan" (see Appendix M5, R 9-254). That plan focuses on practices and measures to ensure the safety and health of employees, not residents. To claim that somehow by extension, this plan would protect the general public is a gross misstep by NYSDOT. This is not sufficient. We again are demanding the NYSDOT consider the cumulative disproportionate impact of lead on this community. To that end, the NYSDOT must first test the raised viaduct for the level of lead prior to demolition.

The NYSDOT should require the contractor to use a higher, more protective level of protection for residents during construction, and supply residents with lead resistant abatement technology while providing independent monitoring and oversight.

Furthermore, to fully understand the impact of lead or fugitive dust on this already over-exposed community the NYSDOT must conduct a health needs assessment. This assessment will serve as a baseline for meeting the mitigation needs required to prevent harm. This assessment will determine who must be relocated due to the fugitive dust and hazards of construction. In return, the health needs assessment would provide meaningful insight as to the need for a relocation effort. We previously raised concerns about NYSDOT failing to establish a relocation center for vulnerable residents who must relocate to protect their health or even their lives. The FEIS continues to ignore that request. The one size fits all conclusion that a community living in an environmentally unjust neighborhood will not be impacted by construction in their backyards prevents the NYSDOT from taking adequate mitigation measures.

R 9-54: As documented in Chapter 6, Section 6-2-3 (Environmental Justice) of the FDR/FEIS, the Community Grid (Selected) Alternative will result in short-term construction-related effects to environmental justice communities. Based on the proximity of the existing I-81 and I-690 corridors to environmental populations and the magnitude of construction, potential adverse

construction effects will be unavoidable but will not be disproportionately high. To mitigate these effects, NYSDOT and FHWA have committed to a multitude of measures that will be taken prior to and during construction related to worker and public health and safety (as described in Section 10 of the ROD). These measures include, but are not limited to, the following:

- Implement an outdoor ambient air quality monitoring program;
- Coordinate with the Onondaga County Health Department and interested health-based community organizations and implement a lead-based paint public education program prior to the demolition of the existing I-81 viaduct and adjacent structures. Potential activities could include the development of educational materials on household protocols to prevent the spread of contaminated dust into homes, providing tacky mat kits and instructions for use to local residents, and holding a community session/meeting focused on demolition and ways to protect residents from lead dust during construction;
- Designate an appropriately qualified and experienced monitor to oversee the implementation of and compliance with the construction commitments related to worker and public health and safety;
- Specify Class B containment (NYSDOT Standard Specifications Subsection 570-3.07) and a minimum grade, impermeable tarpaulin enclosure material for all manual and shrouded power tool paint removal work;
- Specify minimum required levels of personal protective equipment (PPE), respiratory protection, and personal decontamination for all manual and shrouded power tool paint removal work; and
- Perform continuous ambient real-time particulate air quality monitoring adjacent to all Class B containment work involving manual and shrouded power tool paint removal work along the entire I-81 viaduct.

As documented throughout the FDR/FEIS, NYSDOT has developed and designed the Project in consideration of public health. Furthermore, NYSDOT and FHWA will prioritize worker and public health and safety throughout construction.

Please see responses to Comments 7-6 and 9-302 in Appendix M-5 of the FDR/FEIS with respect to conducting a Health Impact Assessment (HIA) for the Project. Please see the response to Comment 7-138 in Appendix M-5 of the FDR/FEIS related to residential displacement during construction.

C 9-55: Furthermore, as highlighted in the NYCLU public comment on the DEIS, Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., requires that the NYSDOT not impose disproportional adverse impacts on the basis of race. The goal of Title VI of the Civil Rights Act is to acknowledge the harm caused by federal agencies to Black communities and prevent further and/or disproportionate harm. It is not too late for the NYSDOT to correct course and consider all of the impacts of the replacement of the I-81 viaduct, especially disproportionate impacts on the environmental justice community next to the viaduct. Thank

you for your consideration and we look forward to continuing to collaborate with your office to ensure the I-81 redevelopment project is a model for the nation.

R 9-55: As documented in Chapter 6, Section 6-2-3 (Environmental Justice) of the FDR/FEIS, NYSDOT assessed the potential for disproportionately high and adverse effects to environmental justice populations resulting from implementation of the Project. Based on this assessment, and as documented in the FDR/FEIS, the Community Grid (Selected) Alternative will not result in disproportionately high and adverse effects to environmental justice populations.

C 9-56: The NYCLU submitted its report called "Building a Better Future: The Structural Racism Built in I-81, and How to Tear it Down," which was submitted as comments on the preliminary DDR/DEIS (April 2019) and DDR/DEIS (July 2021).

R 9-56: NYSDOT reviewed this report and provided responses in Appendix M-5 of the DDR/DEIS published in July 2021.

C 9-57: The NYCLU resubmitted its comments on DDR/DEIS dated October 2014.

R 9-57: See responses to Comments 9-253 to 9-257 in Appendix M-5 of the FDR/FEIS, which reply to this letter.

9-6 FORM LETTERS (VIA NYCLU)

C 9-58: The removal of the I-81 viaduct must be conducted with environmental, racial, and economic justice at the forefront to ensure the fair and equitable treatment of community members who live in the shadow of the highway. To do this, the NYS Department of Transportation must:

- Reserve and transfer the four acres of land to the City of Syracuse adjacent to STEAM at Dr. King Elementary School with a contingency that the land must be developed into a community land trust, and provide resources, oversight, and development by residents living adjacent to I-81 viaduct.
- Protect residents by conducting a health needs assessment to determine who is best suited to be relocated due to the fugitive dust and hazards of construction. A health care access center must be placed within walking distance to Martin Luther King W. The State DOT must also ensure there are independent monitors of daily air quality, lead exposure, and compliance with federal regulations. Conduct testing of the raised viaduct prior to demolition, to assess health risks from leaded paint, leaded gasoline, and housing dust. The State DOT should implement stronger safety standards to protect residents from fugitive dust. This should include requiring construction contractors to provide higher levels of protection for residents and supplying residents with lead-resistant abatement technology.
- Reduce the speed limit for the business loop to 20 miles per hour in and around STEAM at Dr. King Elementary School and within 50 feet of residential neighborhoods.

These recommendations are crucial to righting a historic wrong and creating more equitable outcomes for the entire Syracuse region.

These recommendations will assist the NYSDOT in meeting its own stated goals for the project. These include enhancing economic growth and vitality in the City, re-connecting the Syracuse community, and providing better access to jobs, businesses, and services in downtown Syracuse and beyond.

The recommendations will also help right a historic wrong and create more equitable outcomes for the entire region.

R 9-58:

- Please see the response to Comment 7-9 in Appendix M-5 of the FDR/FEIS regarding the disposition of surplus property and the formation of a land use working group prior to the initiation of construction. As stated in Section 10 of the ROD, further details about the formation of and participation in this working group, including roles and responsibilities, start and end dates, and key milestones, will be presented during continued project public involvement activities.

- Please see the responses to Comments 7-6 and 9-302 in Appendix M-5 of the FDR/FEIS with respect to conducting a Health Impact Assessment (HIA) for the Project. Please see the response to Comment 7-138 related to residential displacement during construction.

As documented throughout the FDR/FEIS, NYSDOT has developed and designed the Project in consideration of public health. Furthermore, NYSDOT and FHWA will prioritize worker and public health and safety throughout construction. Section 10 of the ROD describes the multitude of measures that will be taken prior to and during construction related to worker and public health and safety. These measures include, but are not limited to, the following:

- Implement an outdoor ambient air quality monitoring program;
- Coordinate with the Onondaga County Health Department and interested health-based community organizations and implement a lead-based paint public education program;
- Designate an appropriately qualified and experienced monitor to oversee the implementation of and compliance with the construction commitments related to worker and public health and safety;
- Specify Class B containment (NYSDOT Standard Specifications Subsection 570-3.07) and a minimum grade, impermeable tarpaulin enclosure material for all manual and shrouded power tool paint removal work;
- Specify minimum required levels of personal protective equipment (PPE), respiratory protection, and personal decontamination for all manual and shrouded power tool paint removal work; and
- Perform continuous ambient real-time particulate air quality monitoring adjacent to all Class B containment work involving manual and shrouded power tool paint removal work along the entire I-81 viaduct.

Providing a health care access center is outside the scope of this Project; however, the Project would not preclude others from establishing a center.

- A school speed zone is primarily used to enhance the safety of students crossing a roadway or traveling directly adjacent to the roadway. With the implementation of the Project, there will be no reason for students to cross BL 81 near the Dr. King Elementary School and there will not be a marked crosswalk. As described in Chapter 3, Section 3.4.3 (Community Grid Alternative) of the FDR/FEIS, a dedicated pedestrian and bicycle path will be created along BL 81 and adjacent to Dr. King Elementary School, which will provide a buffer zone between BL 81 vehicular traffic and users of the path. At the request of the school district, the City of Syracuse may choose to implement a school speed zone on MLK, Jr. East.

9-7 PETITION (VIA NYCLU)

COVER LETTER

C 9-59: More than 50 years ago, Interstate 81 ripped through a working-class Black neighborhood in Syracuse. It displaced long-time residents and ensured that poverty, pollution, and a lack of resources would hurt the community that lived in the highway's shadow. These problems persist today. Removing the I-81 viaduct is a great first step toward racial justice, but more must be done.

We need environmental, racial, and economic justice to ensure the fair and equitable treatment of community members who live in the shadow of the viaduct.

The removal of the I-81 viaduct must be conducted with environmental, racial, and economic justice at the forefront to ensure the fair and equitable treatment of community members who live in the shadow of the highway. To do this, the NYS Department of Transportation must:

- Reserve and transfer the four acres of land to the City of Syracuse adjacent to STEAM at Dr. King Elementary School with a contingency that the land must be developed into a community land trust, and provide resources, oversight, and development by residents living adjacent to I-81 viaduct.
- Protect residents by conducting a health needs assessment to determine who is best suited to be relocated due to the fugitive dust and hazards of construction. A health care access center must be placed within walking distance to Martin Luther King W. The State DOT must also ensure there are independent monitors of daily air quality, lead exposure, and compliance with federal regulations.
- Conduct testing of the raised viaduct prior to demolition, to assess health risks from leaded paint, leaded gasoline, and housing dust. The State DOT should implement stronger safety standards to protect residents from fugitive dust. This should include requiring construction contractors to provide higher levels of protection for residents, and supplying residents with lead-resistant abatement technology.
- Reduce the speed limit for the business loop to 20 miles per hour in and around STEAM at Dr. King Elementary School and within 50 feet of residential neighborhoods.

These recommendations are crucial to righting a historic wrong and creating more equitable outcomes for the entire Syracuse region.

R 9-59: Please see response to Comment 9-58, above.

PETITION

C 9-60: We demand the NYSDOT reserve and transfer the four acres of land to the City of Syracuse adjacent to STEAM at Dr. King elementary school with a contingency the land must be developed into a community land trust, and provide resources, oversight, and development by residents living adjacent to I-81 viaduct.

We demand the NYSDOT protect residents by conducting a health needs assessment for community needs to determine who is best suited to be relocated due to the fugitive dust and hazards of construction. We demand a health care access center within walking distance to Martin Luther King W. We demand independent monitors of daily air quality, lead exposure and compliance with federal regulations.

Considering the lead in the raised viaduct, from the leaded paint, leaded gasoline, and housing dust, we demand testing of the raised viaduct prior to demolition. We demand stronger safety standards to protect residents from fugitive dust. The NYSDOT should require the contractor to use a higher, more protective level of protection for residents and supply residents with lead resistant abatement technology.

We demand a reduction in speed for the business loop to 20 miles per hour in and around STEAM at Dr. King and within 50 feet of a residential neighborhood.

R 9-60: Please see response to Comment 9-58, above.

9-8 MUNICIPALITY LETTERS

C 9-61: The Towns of Camillus, Cicero, Clay, DeWitt, Elbridge, Lysander, Manlius, Marcellus, Onondaga, Pompey, Salina, Skaneateles, and Van Buren, as well as several elected officials, requested more time (a minimum of 90 additional days) to review the FDR/FEIS. They cited the size of the document, the tens of thousands of pages of data, analyses, plans and renderings, and the sheer volume of words therein, as well as the thousands of comments submitted on the DDR/DEIS as reasons for an extension. The extensive plans deserve and require careful consideration, careful review, and comprehensive deliberation. All of the new material will require comprehensive understanding and review by the public for which this document was prepared. The 30 days for this review which has been offered cannot be considered sufficient. The granting of 90 additional days for review is the absolute least that should be endorsed.

R 9-61: FHWA and NYSDOT have provided numerous opportunities for meaningful public involvement and considered the comments received on the I-81 Viaduct Project throughout the project development process, starting in the planning stages and extending throughout the environmental review process. These comments have helped shape the I-81 Viaduct Project and have been an important factor in the decision-making process. FHWA and NYSDOT will continue to conduct public outreach and consider comments received throughout construction of the Project. Thus, interested individuals and groups can continue to participate in the Project after the issuance of the Record of Decision (ROD).

FHWA and NYSDOT published the Project's DDR/DEIS in July 2021. The public comment period for the DDR/DEIS, which included both virtual and in-person meetings, was 90 days, which exceeded the required 45 days. NYSDOT and FHWA received more than 8,000 comments during the DDR/DEIS comment period, which were considered, summarized, and responded to in the FDR/FEIS that was published in April 2022. The FDR/FEIS contains much of the same documentation as the DDR/DEIS and text that is new or revised from the DDR/DEIS is highlighted in the FDR/FEIS to allow for a more efficient review by interested individuals.

Pursuant to federal regulations, FHWA and NYSDOT provided a 30-day review period between the publication of the FDR/FEIS and the ROD. While this 30-day period was not a formal comment period, FHWA and NYSDOT welcomed the submission of comments during this time. New and substantive comments received during the FDR/FEIS review period are summarized and responded to in this ROD. The actual comment submissions can be viewed at https://webapps.dot.ny.gov/i-81-viaduct-project.

Based on the above considerations, FHWA and NYSDOT determined that an extension of the FDR/FEIS review period was not warranted.

C 9-62: Members of the Onondaga County Legislature also requested an extension of the FDR/FEIS review time, expressing concerns about adverse impacts to the environment and water quality, increased traffic on neighborhood streets, negative effects on air quality, and overall concerns about the quality of life.

R 9-62: See response to Comment 9-61 above.

9-9 TOWN OF DEWITT, SUPERVISOR

C 9-63: The Town of DeWitt resubmitted its letter on the DDR/DEIS dated October 14, 2021.

R 9-63: See responses to Comments 9-185 to 9-225 in Appendix M-5 of the FDR/FEIS, which reply to this letter.

9-10 AMERICAN INSTITUTE OF ARCHITECTS-CENTRAL NEW YORK (AIA-CNY)

C 9-64: We support the Community Grid Alternative including the removal of the "roundabout" at the MLK School, the use of appropriate scaled, roundabout design to provide safe traffic control and performance in urban areas, and the reduced speed and street width design in urban areas.

R 9-64: Comment noted.

C 9-65: The BL replacing the existing viaduct through the city continues to be oversized and wasteful by design. The new Almond Avenue can function to urban transportation guidelines as a BL with a standard 120-foot width. This would allow for excess and unused portions of the original 1960s takings to be returned to the city for future development and urban use. The

current BL portion of Almond Avenue remains over designed with excessive and costly widths for median, bike lanes, sidewalks, buffers, and even travel lanes. Project street widths for Almond Avenue are oversized at approximately 200 feet, whereas a 120-foot width can provide all of the vehicular and pedestrian elements required to meet the Project Purpose. A reduced width for Almond Avenue is still possible, returning the unneeded lane to the city, while providing a vibrant “main street” character and function within the original 15th Ward. The BL serving the downtown and residential neighborhoods of the city needs to be designed for safety and function, and not speed and capacity. And the people are speaking.

Thank you and your entire design team for your ongoing support of Syracuse and the CNY region.

R 9-65: See responses to Comments 4-70 and 4-71 in Appendix M-5 in the FDR/FEIS with respect to the width of Almond Street/BL 81.

C 9-66: The comments that follow are focused on the BL portion of Erie Boulevard and Almond Street through the pedestrian, downtown, and residential neighborhoods in the city. For the record, some of these requested improvements have been made previously.

Areas of design improvements needed for the BL.

1. Design the street for pedestrian and traffic safety first.

2. Design for pedestrian safety, health, and weather protection.

3. The BL in populated urban areas between I-690 and Brighton Avenue must be designed for safety and not speed. This includes physical street design shape, widths, and views to slow traffic naturally and promote safe driving behavior.

4. The entire BL section, from Erie Boulevard to Brighton Avenue, is designed to retain DOT land taken from the city, its businesses and residences, in the original 1960s I-81 construction.

5. The width of the Almond Street portion of the proposed BL is excessive, unjustified, and short sighted in promoting future urban vitality and safety. This urban "main street" needs to be designed for safety and traffic speed and capacity.

6. Travel lanes are unnecessarily wide at 12' and should be reduces to 11’ each, as 11’ is an acceptable national design standard.

7. Medians, buffers, bike lanes, sidewalks, and travel lanes are excessive, requiring unneeded initial costs and annual maintenance, material, and labor costs. These decisions should not be designed at the sole discretion of the DOT, where city economic and urban development is impaired.

8. Reduce Almond Street widths to 110'-120, with 11' travel lanes and narrower medians, etc.

9. Utilize "Baltimore Complete Streets Manual" for design and safety standards.

10. Almond Street planted median varying between 7.5' to 30' wide.

11. Use WB-50 as "design vehicle" for BL in downtown and pedestrian neighborhoods, not WB-67, per NACTO Urban Street Design Guide.

12. Reduce design speeds for the street BL to improve safety and air quality, and eliminate the need and cost and for visually and environmentally damaging sound barriers.

13. Travel speed limits on the entire urban section of the BL must be reduced to 30-45mph

14. Traffic calming measures between MLK, Jr. East and Colvin Street must include "narrower travel lane widths" of 11' each, as well as the "narrower shoulder widths" as now included as a stated goal.

15. Specifically, the speed limit between Van Buren Street and Brighton Avenue must be reduced to 30- 45mph maximum. The resulting 1-2 minutes travel time reduction in this area will save lives and improve the environmental quality of the I-81 damaged Southside neighborhoods along the rebuilt BL. This is a racial impact issue that can easily be improved with this action.

16. Easy urban access to the Southside of Syracuse was eliminated and cut off by the original I-81. The current FEIS would maintain this "disconnect" at Colvin Street, as the proposed northbound exit only serves traffic from the south, and not the Southside families and businesses. Provide a second roundabout at the BL and Colvin Street intersection, providing 4-way access, with pedestrian signaled crosswalks. This is a racial impact issue that can be improved with this action.

R 9-66: Responses to the comments above are provided below, with the corresponding numbers:

1 & 2. Improving safety is an identified need of the Project and is incorporated into the Project purpose and objectives. See Section 4, Project Needs and Section 5, Project Purpose and Objectives of this ROD.

3 & 5. See response to Comment 4-70 in Appendix M-5 of the FDR/FEIS.

4, 7, & 10. As explained in response to Comment 9-316 in Appendix M-5 of the FDR/FEIS, NYSDOT will work with the City and appropriate stakeholders during the final design phases to refine the design of the areas of Almond Street outside the curb lines, including widths of the medians and pedestrian refuge areas, cycle track, shared use lanes, and sidewalks, etc. The refinements to Almond Street will be designed to be consistent with the City's vision and the needs and objectives of the Project.

6 & 8. See response to Comment 4-43 in Appendix M-5 of the FDR/FEIS.

9. Final design plans for the Project will abide by all pertinent federal and state design guidelines.

11. BL 81 would be designed with the physical characteristics of a Qualifying Highway (see Design Criteria Tables in Appendix C-6 for more information about design characteristics). Because BL 81 is a qualifying highway, the BL 81 route is designed to accommodate a WB-

67. For example, the intersections of Almond Street/Erie Boulevard, Erie Boulevard/Pearl Street, and Oswego Boulevard/Erie Boulevard need to accommodate a WB-67 turn; the criteria for all other cross streets, such as Fayette Street, Washington Street, Genesee Street, Harrison Street, Adams Street, and others would be based on the City bus turning requirement (i.e., a 40-foot-long bus could make a turn). See Appendix C-6, Table C-6.4.2 for turning vehicle criteria.

12, 13, & 15. The speed limits for BL 81 will be set in accordance with its function. Where BL 81 is a city street, it will have a posted speed limit of 30 mph; the northern and southern highway segments will be posted at appropriately higher highway speeds. Noise barriers are proposed where noise levels would exceed the noise abatement criteria and are considered reasonable and feasible. For further information, see Section 6-4-6, Noise of the FDR/FEIS.

14. Traffic calming measures between MLK, Jr. East and Colvin Street, which are described in Section 3.4.3 of the FDR/FEIS, will be refined as needed in final design.

16. See response to Comment 4-50 in Appendix M-5 of the FDR/FEIS with respect to access at Colvin Street. See response to Comment 4-61 in Appendix M-5 of the FDR/FEIS with respect to a roundabout at Colvin Street.

9-11 PYRAMID MANAGEMENT GROUP AND DESTINY USA

C 9-67: In October 2021, Destiny USA and its management entity, Pyramid Management Group (hereinafter "Pyramid"), provided a robust set of questions, comments, and data in response to the New York State Department of Transportation's ("NYSDOT") Draft Environmental Impact Statement ("DEIS") for the Interstate 81 Viaduct Project (the "Project"). A copy of the submission is attached hereto for reference as Exhibit A. Pyramid expected that NYSDOT would thoughtfully and thoroughly review the October submission and issue a supplemental DEIS addressing issues raised in Pyramid's submission, as well as similar concerns identified in many comments from the broader community. Instead, on April 15, 2022, NYSDOT issued a Final Environmental Impact Statement ("FEIS") with negligible substantive modifications and cursory responses to many detailed concerns. This inaction by NYSDOT clearly indicates the agency has no plans to address the serious problems with the DEIS previously outlined. NYSDOT persists in its arbitrary reliance on inaccurate data and faulty assumptions in a deliberately uninformed attempt to force the long-standing predetermined outcome of only a "community grid" on Central New York.

The FEIS serves as the cherry on top of a process that has been irregular and contrary to well-established NEPA procedures from the start. As early as three years ago, NYDOT published a "Preliminary DEIS" (the "pDEIS") prior to obtaining Federal Highway Administration ("FHWA") review and approval, already announcing a preferred alternative. Based on this highly irregular and illegal action, the agency received, but ignored, countless requests for information. Even after FHWA belatedly conducted its review of the NYSDOT analysis, crucial public comments have been brushed to the side so NYSDOT can rush to construct a deeply flawed preferred alternative. The FEIS is arbitrary, capricious, and an

abuse of discretion, and fails to follow the National Environmental Policy Act ("NEPA") procedures. The Project cannot and should not proceed under this flawed process.

The FHWA must demand that NYSDOT prepare a supplemental NEPA review that takes a hard look at reasonable alternatives and fairly assesses major community and environmental impacts, including a reasonable and thorough response to the serious issues raised by Pyramid and other stakeholders. Moreover, NYSDOT's actions since publication of the DEIS demonstrate a rush to advance the Community Grid even before a final agency action under NEPA. NYSDOT has aggressively advanced procurements for elements of its preferred alternative well before issuance of a Record of Decision ("ROD"). The agency has also pursued condemnation actions against multiple local property owners, including Pyramid, prior to resolving public comments and issuance of a ROD. As recently as May 10, 2022, NYSDOT has contacted Pyramid advising NYSDOT will be accessing the Destiny USA property this spring and summer. Such actions should be halted until a fulsome supplemental review is conducted.

NYSDOT Continues to Pursue a Predetermined Outcome—NEPA requires an agency to take a hard look at a reasonable range of alternatives. Yet for years, NYSDOT has been laser-focused on a predetermined outcome—the 481 Bypass/Community Grid (the "Community Grid"). Notwithstanding vague assertions that all options would be considered, the agency's record shows that the Community Grid was NYSDOT's "chosen plan" for well over a decade. This fixation encouraged NYSDOT to generate arbitrary data and arbitrary standards by which to create and assess proposed alternatives in the DEIS, and now the FEIS. The pDEIS and DEIS range of alternatives were selectively considered by NYSDOT utilizing random factors, and in NYSDOT's consideration of alternatives, non-preferred alternatives, such as a tunnel, viaduct reconstruction, or hybrid alternative, were burdened with unnecessary and costly design requirements that were not imposed on the Community Grid. As outlined in the October submission and included as FEIS Appendix Comment #C-945, certain alternatives were rejected based on factors such as "reasonable" Project costs of "less than 2.5 times the estimated cost of Alternative V-1 (rehabilitation)" and numbers of parcels to be acquired for construction of the Project. Why were these specific factors selected? We do not know.

Rather than address this question on selection criteria, NYSDOT simply cites to prior statements—the very information that Pyramid questioned in its prior comments—and dismisses potential solutions with little or no review. These dismissed alternatives included a viaduct long-term rehabilitation program, a stacked viaduct, several tunnel alternatives with grids on top, a depressed highway (i.e., open trench), and a western bypass alternative. [FEIS Comment Appendix #R9-344]. Tellingly, NYSDOT states, "The DDR/DEIS and FDR/FEIS present a fair and equitable evaluation of the No Build, Viaduct, and Community Grid Alternatives," but is silent as to the adequacy of review for all other dismissed alternatives. [FEIS Comment Appendix #R9-344].

NYSDOT is now using the same arbitrary standard in review of the Harriet Tubman Memorial Freedom Bridge (the "Bridge"). [FEIS Comment Appendix #R9-245]. For example, NYSDOT

touts that permanent re-routing and creation of Business Loop 81 will benefit the community. However, NYSDOT dismisses the Bridge in part because a temporary rerouting of roads during construction of a Bridge is deemed unacceptable. Further, construction methods for the Bridge are wholly speculative, with NYSDOT stating construction "…would likely require the demolition of buildings" and foundations "…would likely exist in the footprint of the existing corridor," without considering the actual design or construction for such a structure in Syracuse. NYSDOT also dismisses a Bridge simply because it would result in a "dominant visual feature" and "barrier," in the eyes of NYSDOT. Yet NYSDOT finds a multi-lane, street level highway with huge trucks next to pedestrians on sidewalks as a perfectly acceptable visual feature. This defies all logic and clearly indicates review of proposed alternatives is not occurring on a level playing field. Minor modifications to the "proposed alternative" do not adequately address community objections to dumping traffic from a major interstate highway onto local streets.

In making assumptions regarding construction methods for a Bridge, NYSDOT cites construction methods used for the Goethals Bridge and the Mario M. Cuomo Bridge – assumptions which are used to disqualify the Bridge as a viable option in Syracuse. Interestingly, NYSDOT refused to compare the Community Grid to other street-level highway projects in NYS, such as the Sheridan Expressway modification, and disregarded questions posed in Pyramid's October submission regarding issues with the Sheridan Expressway's boulevard design. It seems NYSDOT is only willing to make comparisons to other projects when convenient for supporting the Community Grid.

NYSDOT provides a conclusory assertion that the Community Grid meets "each of the Project's needs and objectives." [FEIS Comment Appendix #R9-344]. Simply making this assertation on repeated occasions makes it neither accurate nor true. On the contrary, NYSDOT's dismissal of proposed alternatives without full consideration prohibits us from knowing if these dismissed alternatives may better meet the Project's purpose and need. Both Pyramid's and the community's comments to the DEIS show there is deep concern that the Community Grid as outlined will fail to meet the Project's purpose and need, especially in regard to mobility improvement and increased connectivity. Indeed, the Community Grid may be one of the worst options as the Community Grid increases fuel consumption, vehicle miles traveled, increased wear on vehicles and roadways, increased cost of time and travel distance for all individuals and product deliveries, delay of emergency vehicles and GHG emissions, all points which NYSDOT does not address. In summary, arbitrarily endorsing NYSDOT's preferred alternative and dismissing other alternatives without comprehensive and unbiased review is an absolute abuse of agency discretion.

The FEIS Data is Fundamentally Flawed, Making the FEIS Analysis and Conclusions Flawed—Pyramid raised numerous issues related to the adequacy and accuracy of the DEIS data in its comments. These issues included NYSDOT's continued reliance on traffic data that is almost a decade old, inaccuracies in the projected growth rate, and inconsistencies in project areas considered. Rather than provide background data or simply re-run simulations using recommended data, NYSDOT has done nothing. NYSDOT refuses to revise any of the data counts or assumptions utilized and simply continues to cite to the very

data that is being questioned. There would be little harm—and in fact great benefits—to NYSDOT addressing the issues raised by re-running the simulations with a revised traffic growth rate. It seems the only reason NYSDOT would not take such action would be to hide the truth—that the Community Grid clearly cannot meet the documented Project goals and community needs under a realistic and factual data set.

Take, for example concerns raised regarding discrepancies in "existing" data reflected in the DEIS and the pDEIS. Pyramid flagged various discrepancies between the DEIS and the pDEIS in regard to trip times, all of which used the same 2013 data counts for baseline assumptions. [FEIS Comment Appendix #R9- 350]. NYSDOT responded that these variables in "existing" data were due to "…design changes and extending the design year from 2050 to 2056" and "variability between individual simulations, even when model geometry and demand are identical. This stochasticity actually provides a better representation of conditions, as no peak hour is exactly the same from day to day." [FEIS Comment Appendix #R9-350].

NYSDOT's response admits there have been many changes to the Project. NYSDOT admits there has been a change in the build year. NYSDOT admits that no two days of traffic are ever the same. Yet with all of these variables in mind, NYSDOT maintains that the foundational element of its analysis—the baseline traffic counts—have not changed since 2013. NYSDOT still regarded 2013 as the appropriate base year because base year traffic volumes have been "revalidated" by comparing the 2013 data to more recent 2019 traffic counts [FEIS Comment Appendix #R9-347]. It is an illogical and confusing conclusion. Even more confusing is this—if 2019 counts were conducted, why not simply use those 2019 counts in their consideration, rather than using them to "revalidate" 2013 data—without any description of what "revalidating" entails?

Relatedly, Pyramid demonstrated that the annual growth rate of 0.3 percent was inappropriate and inaccurate considering the actual population and development growth within the Central New York region. Specifically, comments questioned the DEIS statement that "All counts collected prior to 2013 were factored using an annual growth rate of 0.3 percent (estimated from the SMTC Regional Travel Demand Model) to represent a common base year of 2013." NYSDOT defended this assumption by stating: "The 2013 base year has been retained since the study area has not experienced significant travel pattern changes in recent years. For example, annual data such as 'Syracuse Urban Area—VMT since 1985' developed by NYSDOT shows a very stable vehicle miles traveled trend since 2013 for the functional classes of freeways, arterials, and collectors in the Syracuse urban area."

Data submitted in Pyramid's comments indicate that from 1995 through 2014, the annual traffic growth rate was closer to 2.7%. Rather than address the discrepancy in data, NYSDOT simply concludes that because baseline traffic counts occurred in 2013, and 2013 is after the period of 1995 through 2013, growth before 2013 was captured in the traffic count. This response simply does not address the discrepancy in the growth rate data and ignores the fundamental point raised—that the systemwide average growth rate being used

in the DEIS (and now the FEIS) is inaccurate. [FEIS Comment and Response #R9-347]. Actual traffic counts were arbitrarily cut by NYSDOT in the DEIS by 20% to alleviate the preferred alternative's unavoidable failures, after which the actual 19-year average annual growth rate of 2.7% was cut to a projected growth rate of 0.3% from the initiation of design in 2014 to the Design Year of 2056. This has resulted in NYSDOT using a projected overall growth rate of 7%, where use of the historic growth rate would show a 123% overall growth in traffic volume. This again confirms that use of realistic data would prove the Community Grid Alternative could not meet Project goals and community needs.

Further, NYSDOT failed to explain how the "Study Area" has been determined. Pyramid questioned why a number of crucial intersections were excluded from the DEIS review and asked that a supplemental DEIS include review of major traffic generating uses in the manufacturing sector [FEIS Comment Appendix #C9-349]. Rather than address this specific request, NYSDOT avoided the subject altogether by responding, "For some topics—such as air quality, noise, cultural resources, traffic, and others—a special study area is defined for consistency with regulatory requirements or to capture a larger or smaller area of potential effects for the Project." [emphasis added].

While consistency with "regulatory requirements" may necessitate a specific study area, NYSDOT admits that in other instances, a "special study area" is used to "capture a larger or smaller area…" but fails to state the parameters for these "special study areas." How is the public supposed to know and understand what the true Project impacts will be, and how is the NEPA procedure being followed, when NYSDOT is picking study areas arbitrarily to fit the predetermined narrative? Each of these fundamental flaws—and NYSDOT's failure to address them on repeated occasions—is an absolute abuse of agency discretion.

Negative Project Impacts in the DEIS Formally Raised in October's Submission Were Not Responded to in a Meaningful Way—As evidenced from our review thus far, fundamental problems identified with the DEIS have been largely disregarded. NYSDOT blatantly ignores comments related to increased fuel consumption, air quality deterioration, increased travel time, and induced suburban sprawl that would result from the massive diversion of local and long-distance car and truck traffic through the South Side neighborhoods and to Interstate 481 to the east of the Syracuse. Instead of even attempting to address these questions, NYSDOT simply refers back to their incomplete DEIS language in question. [FEIS Comment Appendix #C 9-355, 9-356, and 9-357 with associated responses.]

Concerns raised regarding air quality impacts due to increases in traffic lights and vehicular idling, as well as noise level increases at 21 receiver sites, were simply dismissed by NYSDOT. [FEIS Comment Appendix #C 9-357]. The concerns, which raised questions on the underlying data being used to make assumptions and the impacts this data could have on ultimate outcome, resulted in NYSDOT stating, "The air quality and noise analyses included the appropriate traffic data." [FEIS Comment Appendix #R 9-357]. This dismissive response is an absolute abuse of agency discretion, especially because a full Project impact analysis cannot be completed when the conclusions are based on inaccurate data.

Another blatant disregard for Project impacts is seen through NYSDOT's failure to respond to comments regarding direct economic impacts for Destiny USA and the potential impact for disinvestment in the broader community. NYSDOT states in a number of responses that a comprehensive assessment and evaluation of economic effects of the Project was conducted throughout the DEIS and FEIS. [FEIS Comment Appendix #R 9-339, R 9-342, R 9-343, R 9-344, R 9-349, R 9-359]. NYSDOT further asserts that there has been careful study of "…the potential beneficial and adverse effects of the Project alternatives on the local and regional economies…" [FEIS Comment Appendix #R 9-362]. NYSDOT, through these statements, concedes that the Project may impact the economy, that review of economic impacts is required, and that the Project's economic impacts are within NEPA's zone of interest. NYSDOT's acknowledgement is meaningless, though, as the agency failed to conduct an assessment of what the Project's economic impacts could be.

Direct Economic Impacts—The FEIS continues to underestimate the direct economic impacts the Project would have on the greater Syracuse community and Destiny USA as a destination. NYSDOT's responses to comments ignore Destiny's operational concerns and disregard years of Destiny's own carefully collected data. First, Destiny continues to be excluded as an "anchor institution" in the FEIS. The DEIS (and now the FEIS) includes a review of potential economic impacts that would (or would not) occur as a result of implementing the Community Grid. Pyramid previously noted that Destiny was not listed as an "anchor institution" within the DEIS, which influences how impacts to Destiny are treated within this review. [FEIS Comment Appendix #C 9-361] NYSDOT's response acknowledges that Destiny was not treated as an anchor institution (despite businesses employing less than 1,000 people being included). [FEIS Comment Appendix #C-9361].

Destiny USA is an approximately 2.4 million leasable sq. ft. facility that in recent years has welcomed over 20 million visitors per year, employed close to 5,000 workers, and generated annual sales of more than half a billion dollars, resulting in approximately $38 million in sales tax that benefitted NYS, Onondaga County, and the local community. A November 2021 Centerstate Corporation for Economic Opportunity Syracuse, New York Fact Sheet lists Destiny USA as the third largest employment center in the region.* These numbers are facts —not remote estimates based on speculative data. Rather than correctly classifying Destiny as an anchor institution, NYSDOT simply added a line below the "anchor institution" chart stating, "In addition, the retail and food service businesses within Destiny USA are substantial employers; Destiny USA and its tenants collectively employ approximately 5,000 workers." This does not address the key concern that Destiny as an anchor institution is being under evaluated in the overall economic review and is an arbitrary dismissal of an important fact: Destiny is one of the most crucial employers and sales tax generators within the Syracuse region. (*see Centerstate Corporation for Economic Opportunity November 2021 Fact Sheet, available at

https://www.centerstateceo.com/sites/default/files/November%202021%20Fact%20Sheet.pdf.)

Second, NYSDOT dismisses Destiny's own specific data which conflicts with NYSDOT's limited perspective of the mall's demographics and traffic generation. FEIS Comments 9-367 through 9-370 include data collected from Robert Schoeneck, General Manger at Destiny USA, which includes aggregated data on zip codes guests visit from and Placer.ai data regarding travel locations. Rather than review and analyze Destiny's years of data, NYSDOT simply used its own data to make its own assumptions on customer travel trends. By way of example, NYSDOT responds that, "Those living within closer proximity to Destiny USA are more likely to visit Destiny USA more frequently than those living farther away" [FEIS Comment Appendix #C-368]. This conclusory statement misses the point of Destiny's data—travel ease and proximity is key to the customer base. NYSDOT has tried to create its own web of travel patterns rather than review years of data that would produce an informed analysis.

Third, NYSDOT disregards the serious concerns raised by Destiny regarding tourism impacts related to COVID-19. [FEIS Comment Appendix #C 9-362]. NYSDOT responds that, "The economic analyses in Section 6-3-2 do not speculate as to the long-term market effects of the Covid pandemic during operating conditions for Project alternatives (i.e., 2026 forward)." [FEIS Comment Appendix #R9-362]. NYSDOT simply ignores Comment 9-353, which requests information on whether travel demand times were modified as a result of COVID-19, with more trips around lunch time or on Thursday evening, which could change the definition of "peak" or "off peak" trips. In addressing COVID impacts on the shipping industry, NYSDOT simply says that roads will have excess capacity to handle increases in shipping and local warehousing [FEIS Comment Appendix R 9-353]. Rather than address these questions, NYSDOT continues to rely on outdated and inappropriate data in an attempt to reduce any potential economic impacts.

Impact of Disinvestment—NYSDOT states that while the displacement of an individual business, in and of itself, is not an environmental issue, it can lead to adverse environmental effects warranting consideration if the displacement leads to disinvestment. [FEIS Comment Appendix #R9-360]. NYSDOT's "supplemental analysis" related to Destiny—a review which did not use any data nor include feedback from Destiny—fails to account for the Lakefront Area disinvestment that would occur if Destiny was impacted, nor the disinvestment that would occur due to NYSDOT's substantial condemnations within the area to create "pedestrian overlooks" with a grand view of Destiny USA's 7,000 car parking facility. This condemnation of land will fundamentally change planned development and could certainly result in broader disinvestment in the community.

Rather than address this multi-acre condemnation as a major change in land use and opportunity for disinvestment, NYSDOT simply states that the Destiny complex is accounted for, which includes the Carousel Center as well as the subsequent Destiny USA expansion. [FEIS Comment Appendix #R9-351]. This response perfectly exhibits that NYSDOT is missing the point—future planned development and associated impacts the Community Grid would have on this development were completely disregarded by NYSDOT in their review. While multi-acre condemnation was disregarded, condemnations of small, irregularly shaped parcels under the existing I-81 viaduct are discussed at length, despite these parcels

being unlikely sites for redevelopment. This is a plainly arbitrary tactic by NYSDOT to advance the preferred alternative rather than provide for a truly thorough and accurate analysis.

In addition to the above-referenced metrics, NYSDOT has not provided a satisfactory response on the "expected changes in land use" [FEIS Comment Appendix #R9-351] that were considered versus those that were not. Land use plans were illogically selected for study, with certain projects ignored at the whim on NYSDOT. Pyramid explained that there were inconsistencies in land use assumptions related to area growth. NYSDOT's response? That growth data was calculated on "expected changes in land use" and "long-term regional planning goals," and future projects would be "…responsible for evaluating and mitigating the individual impacts caused by those impacts." [FEIS Comment Appendix #R9-351, #R9-359]. This "non-response" simply cites back to the existing DEIS sections that were being questioned and fails to explain why certain planning studies were used versus others, and whether revised versions of these studies that have been updated over the last decade were accounted for in NYSDOT's data.

More generally, NYSDOT failed to respond to the previous comments related to changes in traffic patterns leading to disinvestment. For example, questions regarding project objectives not being met were ignored, especially related to whether the Community Grid actually would "connect" communities, reduce congestion, or enhance safety. [FEIS Comment Appendix #9-366]. It seems the choice of the preferred alternative—which is repeatedly justified as remediation of a separation and dislocation of the community that once existed before construction of the I-81 viaduct in downtown Syracuse decades ago—is designed to benefit the already advantaged scholastic, medical, and downtown properties adjacent to it. The preferred alternate would result in further separation as well as economic and environmental burdens placed on the minority neighborhoods that actually exist today to the south of downtown Syracuse. [FEIS Comment Appendix #9-366].

Among the few revisions that appear in the recently published FEIS is elimination of the Business Loop 81's connection to Dr Martin Luther King Street, one of the South Side's most important connecting streets. In doing so, the South Side's primary vehicular and pedestrian access to the hospitals and scholastic facilities on University Hill is removed. We renew our calls for creation of a comprehensive land use analysis that accurately addresses proposed future land use patterns and will correctly capture the socioeconomic impacts of disinvestment in the community related to the Project. Ignoring negative Project impacts in order to advance selection of a preferred alternative is an absolute abuse of agency discretion.

Conclusion

The Project is at a critical juncture. Selection of an improperly and unacceptably preferred alternative, based on inaccurate and long-term flawed assumptions, will have serious impacts to the Central New York region, local communities, and local businesses. NYSDOT has continuously dodged key questions, which is apparent now more than ever after release of the FEIS. We and our client have continuously attempted to engage with NYSDOT and

FHWA representatives to advance a project that functions, meets the objectives of local residents, and will be a benefit to all stakeholders. That Project will not be possible unless a supplemental DEIS is issued which thoroughly analyzes and substantively corrects the arbitrarily dismissed alternatives and the serious defects present throughout this entire NEPA process and repeated in the FEIS. Enclosures

Exhibit A – 1999 Cummings McNulty Tourism Assessment

Exhibit B – Letter from Stephen J. Congel re: Interstate 81 Project

Exhibit C – Centerstate 2020 Fact Sheet

Exhibit D – Table 1

Exhibit E – DEIS Table 5-7

Exhibit F – Tables 1, 2, 3

Exhibit G – Diverted Vehicles Graphic Analysis

Exhibit H – Intersections Graphic Analysis

Exhibit I – Travel Demand Model Excerpt

Exhibit J – NYS Condemnation Letter

Exhibit K – Destiny Economic Analysis

Exhibit L – NYSDOT Hotel Presentation

R 9-67: FHWA and NYSDOT, as joint lead agencies, have prepared the Environmental Impact Statement (EIS) for the Project in accordance with the National Environmental Policy Act, State Environmental Quality Review Act, and all other applicable federal and state laws and regulations. The Record of Decision documents FHWA's and NYSDOT's decision-making process.

As documented in Chapter 3 (Alternatives) of the FDR/FEIS, a reasonable range of alternatives for the Project were studied in the EIS. Chapter 5 (Transportation and Engineering Considerations) of the FDR/FEIS documents the traffic analysis conducted for the Project and Chapter 6 (Social, Economic and Environmental Considerations) of the FDR/FEIS documents the assessment of social, economic and environmental effects for the Project. Chapter 6, Section 6-3-1 (Land Acquisition, Displacement, and Relocation) documents the anticipated acquisition of real property required to implement the Project and the assessment of potential effects associated with displacement of residents, businesses, and other uses.

10 LIST OF COMMENTERS

10-1 INTRODUCTION

This section lists the interested parties who submitted comments on the FDR/FEIS and includes their name, type of comment, date, and assigned response number(s), which

correspond to Sections 2 through 9 of this appendix. The response numbers indicate where the relevant responses to comments can be found. For instance, response to Comment 2-1 is found in Section 2 of this appendix, 3-1 is in Section 3, and so on. As noted in Section 1 of this appendix, similar comments were grouped and summarized, and a response is provided to each summary comment.

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
A.,	Jenice	Petition	05/16/22	9-59 through 9-60
a57belairman		Email	04/15/22	4-2
Abdella,	Jennifer	Email	05/16/22	9-58
Abdi,	Abdikadir	Petition	05/16/22	9-59 through 9-60
Abdi,	Dhowley	Petition	05/16/22	9-59 through 9-60
Acox,	Jonathan	Email	05/10/22	3-1
Ad,	Yalada	Petition	05/16/22	9-59 through 9-60
Adams,	Devon	Petition	05/16/22	9-59 through 9-60
Adams,	Diamond	Petition	05/16/22	9-59 through 9-60
Adams,	Ebony	Petition	05/16/22	9-59 through 9-60
Adams,	Shakayla	Petition	05/16/22	9-59 through 9-60
Adsitt,	Linda	Email	05/16/22	4-2
Ahmic,	Armec	Petition	05/16/22	9-59 through 9-60
Ahmo,	Dhawaf	Petition	05/16/22	9-59 through 9-60
AIA-CNY, I-81 Task Force		Letter	05/03/22	4-1, 7-9, 7-10
AIA-CNY, I-81 Task Force		Letter	05/16/22	9-64 through 9-66
Aiddny,	Angelique	Petition	05/16/22	9-59 through 9-60
Aiken,	Reverend	Petition	05/16/22	9-59 through 9-60
Aldamuy,	Cynthia	Petition	05/16/22	9-59 through 9-60
Aldamuy, Jr.,	Peter	Petition	05/16/22	9-59 through 9-60
Aldamuy, Sr.,	Peter	Petition	05/16/22	9-59 through 9-60
Alexander,	Prettie	Petition	05/16/22	9-59 through 9-60
Ali,	Fatima	Petition	05/16/22	9-59 through 9-60
Ali,	Isnino	Petition	05/16/22	9-59 through 9-60
Ali,	Omar	Petition	05/16/22	9-59 through 9-60
Allen,	Eric	Petition	05/16/22	9-59 through 9-60
Allen,	Jason	Petition	05/16/22	9-59 through 9-60
Anderson,	Abrehet	Email	05/16/22	9-58
Anderson,	Naipriesha	Petition	05/16/22	9-59 through 9-60
Anderson,	Paul	Email	04/16/22	4-2
Anderson,	Paul	Email	05/02/22	4-2
Anonymous		Letter	04/27/22	4-2
Anonymous		Voicemail	04/15/22	4-2
Anonymous		Voicemail	05/12/22	4-2
Anonymous		Voicemail	05/13/22	4-2, 4-19
Anonymous		Voicemail	04/15/22	4-2
Anonymous		Petition	05/16/22	9-59 through 9-60
Anonymous		Petition	05/16/22	9-59 through 9-60
Anonymous		Petition	05/16/22	9-59 through 9-60
Anonymous		Petition	05/16/22	9-59 through 9-60
Anonymous		Petition	05/16/22	9-59 through 9-60
Anonymous		Petition	05/16/22	9-59 through 9-60
Aretsky,	Jonathan	Email	05/06/22	7-13

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Argus,	Don	Email	05/16/22	8-4
Armani,	Andrew	Email	05/14/22	9-58
Armstrong,	Herijeh	Petition	05/16/22	9-59 through 9-60
Aroche,	Jacqueline	Petition	05/16/22	9-59 through 9-60
Askew,	Katye	Petition	05/16/22	9-59 through 9-60
Atkins,	Christine	Email	05/13/22	4-2
Attle,	James	Email	05/02/22	8-1
Atwater,	Kevin	Petition	05/16/22	9-59 through 9-60
Auarelren,	Chavatus	Petition	05/16/22	9-59 through 9-60
Auarelren,	Curtis	Petition	05/16/22	9-59 through 9-60
Aureys,	Thalima	Petition	05/16/22	9-59 through 9-60
Aylward,	Philip	Email	05/11/22	8-4
Azzoto,	Laurie	Email	04/15/22	5-1
Babcock,	David	Email	05/16/22	8-5
Baker,	Shannon	Petition	05/16/22	9-59 through 9-60
Balbuena,	Miguel	Email	05/16/22	4-9, 4-10, 7-19
Baldacci,	Susan	Email	05/16/22	9-58
Baldo,	Nathaniel	Email	05/14/22	9-58
Ballara,	Nicole	Petition	05/16/22	9-59 through 9-60
Ballard,	Daniel	Petition	05/16/22	9-59 through 9-60
Ballard,	Nicole	Petition	05/16/22	9-59 through 9-60
Banazek,	Margaret	Email	05/03/22	8-1
Barclay, NYS Assemblymember	William	Letter	05/02/22	9-61 through 9-62
Barnello,	James	Email	05/13/22	7-14
Barnello,	James	Email	05/13/22	7-14
Barnello,	James	Email	05/16/22	7-14
Barr,	Brian	Petition	05/16/22	9-59 through 9-60
Barry,	Richard	Email	05/12/22	3-1
Battery,	John	Petition	05/16/22	9-59 through 9-60
Baum,	Carol	Petition	05/16/22	9-59 through 9-60
Baxter,	Johnny	Petition	05/16/22	9-59 through 9-60
Baxter,	KayJonique	Petition	05/16/22	9-59 through 9-60
Bayavange,	Thomas	Petition	05/16/22	9-59 through 9-60
Bebernes,	Chelsea	Email	05/16/22	3-1
Becker Trucking		Email	05/13/22	4-2
Benner-Rhoades,	Marie	Email	05/15/22	9-58
Bennett,	Gail	Petition	05/16/22	9-59 through 9-60
Bennett,	Joseph	Email	05/14/22	9-58
Bentley,	Janet	Email	05/16/22	9-58
Benton,	Audrey	Petition	05/16/22	9-59 through 9-60
Bernhardt,	Jay	Email	05/11/22	5-1
Bernhardt,	Jay	Email	05/14/22	5-2

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Berreto,	Julia	Petition	05/16/22	9-59 through 9-60
Berry,	Diane	Petition	05/16/22	9-59 through 9-60
Bertollini,	Jo Ann	Email	05/11/22	3-1
Bethea,	Derek	Petition	05/16/22	9-59 through 9-60
BeVard,	Jon	Email	05/03/22	8-1
Bick,	Rob	Email	05/15/22	4-2
Binet,	Melissa	Email	05/16/22	7-7, 8-1
Blacksheer,	D.	Petition	05/16/22	9-59 through 9-60
Bloodworth,	Khyri	Petition	05/16/22	9-59 through 9-60
Boatwright,	DeSheonna	Petition	05/16/22	9-59 through 9-60
Bodily,	William	Email	05/10/22	4-2
Bola Slav,	Rudolph	Voicemail	05/15/22	4-2
Boll,	Thomas	Email	05/16/22	9-58
Bombard,	Justina	Email	05/13/22	9-58
Bombard,	Margaret	Email	05/13/22	9-58
Bowhall,	William	Email	05/12/22	3-1
Bradford,	Joelle	Petition	05/16/22	9-59 through 9-60
Branch,	Alvonce	Petition	05/16/22	9-59 through 9-60
Branch,	J.	Petition	05/16/22	9-59 through 9-60
Braneh,	Michael	Petition	05/16/22	9-59 through 9-60
Braswell,	Marilyn	Petition	05/16/22	9-59 through 9-60
Breland,	Corey	Petition	05/16/22	9-59 through 9-60
Breland,	Gabriella	Petition	05/16/22	9-59 through 9-60
Bright,	Joe	Email	04/23/22	7-3
Broadwater,	Calvin	Petition	05/16/22	9-59 through 9-60
Brousin,	Terry	Petition	05/16/22	9-59 through 9-60
Brown,	Carzen	Petition	05/16/22	9-59 through 9-60
Brown,	Ken	Petition	05/16/22	9-59 through 9-60
Brown,	Kentury	Petition	05/16/22	9-59 through 9-60
Brown,	Patricia	Petition	05/16/22	9-59 through 9-60
Browne,	Reginald	Petition	05/16/22	9-59 through 9-60
Brule,	Jill	Email	05/15/22	9-58
Brunner,	Ray	Email	05/16/22	4-2
Bruswell,	Jamil	Petition	05/16/22	9-59 through 9-60
Bryant,	Corbin	Petition	05/16/22	9-59 through 9-60
Bryant,	Duane	Petition	05/16/22	9-59 through 9-60
Buddha,	Danielle	Voicemail	05/16/22	4-2
Buerkle,	Anne	Email	05/13/22	8-4
Bunnan,	Teeshaya	Petition	05/16/22	9-59 through 9-60
Burke,	Veronis	Petition	05/16/22	9-59 through 9-60
Burnett,	Gary	Petition	05/16/22	9-59 through 9-60
Caldergo,	Keishla	Petition	05/16/22	9-59 through 9-60
Caletka,	Esther	Email	04/18/22	8-4

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Caloia,	Lisa	Email	04/29/22	4-2, 8-4
Camden,	Malik	Petition	05/16/22	9-59 through 9-60
Campbell,	Jaleel	Email	05/16/22	9-58
Candela,	Stephen	Email	04/18/22	5-1, 7-8
Candela,	Stephen	Email	04/18/22	5-1, 7-8
Candela,	Stephen	Email	04/20/22	5-1
Candela,	Stephen	Email	05/13/22	5-1
Canesa,	Mary	Petition	05/16/22	9-59 through 9-60
Cannon,	Bernard	Petition	05/16/22	9-59 through 9-60
Cannon,	Charles	Petition	05/16/22	9-59 through 9-60
Cannon,	Jackie	Petition	05/16/22	9-59 through 9-60
Cannon,	Keith	Petition	05/16/22	9-59 through 9-60
Cannon,	Keith	Petition	05/16/22	9-59 through 9-60
Cannon,	Kelvin	Petition	05/16/22	9-59 through 9-60
Cannon,	Kennedy	Petition	05/16/22	9-59 through 9-60
Cannon,	Kenneth	Email	05/13/22	9-58
Cannon,	Kenneth	Petition	05/16/22	9-59 through 9-60
Capers,	Sharon	Petition	05/16/22	9-59 through 9-60
Capone,	Ronald	Email	05/16/22	3-1
Caraballo,	Yaira	Petition	05/16/22	9-59 through 9-60
Carr,	Jekking	Petition	05/16/22	9-59 through 9-60
Carrasquillo,	Macy	Petition	05/16/22	9-59 through 9-60
Carroll,	Timothy	Email	05/02/22	8-1
Carson,	J.	Petition	05/16/22	9-59 through 9-60
Carter,	James	Petition	05/16/22	9-59 through 9-60
Cass,	Mark	Petition	05/16/22	9-59 through 9-60
Castro,	Carmen	Petition	05/16/22	9-59 through 9-60
Cauthen,	Quaclasia	Petition	05/16/22	9-59 through 9-60
Cauthen,	Quadasia	Petition	05/16/22	9-59 through 9-60
Chappell,	Michael	Email	04/23/22	4-14, 7-13
Chatman,	Nicole	Petition	05/16/22	9-59 through 9-60
Chattejee,	A.	Petition	05/16/22	9-59 through 9-60
Chechatka,	Frances	Email	02/26/22	7-15
Cheeves,	Betty	Petition	05/16/22	9-59 through 9-60
Chey,	Ewet	Petition	05/16/22	9-59 through 9-60
Chisholm,	Ndenny	Petition	05/16/22	9-59 through 9-60
Chmielewski ,	Katie	Email	05/12/22	9-58
Chmielewski,	Kate	Email	05/12/22	9-58
Chovan,	Joe	Email	04/15/22	2-2
Chuz,	Carmen	Petition	05/16/22	9-59 through 9-60
Cirio,	Beverly	Petition	05/16/22	9-59 through 9-60
City of Syracuse		Email	05/16/22	4-12, 9-6 through 9-30
Clark,	Roborto	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Clements,	Tim	Email	05/16/22	4-2
Cohee,	Margaret	Email	05/15/22	9-58
Coleman,	Samuel	Petition	05/16/22	9-59 through 9-60
Coleman,	Samy	Petition	05/16/22	9-59 through 9-60
Coleman,	Unique	Petition	05/16/22	9-59 through 9-60
Colin,	Melissa	Petition	05/16/22	9-59 through 9-60
Collier,	Thomas	Petition	05/16/22	9-59 through 9-60
Collins,	Lataya	Petition	05/16/22	9-59 through 9-60
Comer,	Tony	Petition	05/16/22	9-59 through 9-60
Concepcion,	Amelia	Email	05/15/22	9-58
Connor,	Sheinana	Petition	05/16/22	9-59 through 9-60
Cooper,	Michael	Petition	05/16/22	9-59 through 9-60
Cooper,	Michael	Petition	05/16/22	9-59 through 9-60
Cotton,	Kiamesha	Petition	05/16/22	9-59 through 9-60
Cotton,	Morris	Petition	05/16/22	9-59 through 9-60
Craner,	Jeff	Email	05/13/22	4-2
Crenshaw,	Robert	Petition	05/16/22	9-59 through 9-60
Croom,	Andrew	Email	05/16/22	9-58
Cruza,	Ashley	Petition	05/16/22	9-59 through 9-60
CSX		Email	05/05/22	4-7
Cunningham,	Mary	Email	05/16/22	9-58
Curry,	Benny	Petition	05/16/22	9-59 through 9-60
Curry,	Latbasha	Petition	05/16/22	9-59 through 9-60
Curtin,	Donna	Email	05/16/22	4-2
Curtin,	Maureen	Email	05/14/22	9-58
Daigle,	Alice	Petition	05/16/22	9-59 through 9-60
Daigle,	Alice	Petition	05/16/22	9-59 through 9-60
Dancil,	Thandekah	Petition	05/16/22	9-59 through 9-60
Dann,	Lesley	Petition	05/16/22	9-59 through 9-60
Darius,	Alemnesh	Email	05/16/22	9-58
Davies,	Betty	Petition	05/16/22	9-59 through 9-60
Davis,	Alexis	Petition	05/16/22	9-59 through 9-60
Davis,	Alexis	Petition	05/16/22	9-59 through 9-60
Davis,	Brooke	Petition	05/16/22	9-59 through 9-60
Davis,	Mervin	Petition	05/16/22	9-59 through 9-60
Davis,	Patricia	Petition	05/16/22	9-59 through 9-60
Davis,	Rasheed	Petition	05/16/22	9-59 through 9-60
Davis,	Shameka	Petition	05/16/22	9-59 through 9-60
Davis,	Shameka	Petition	05/16/22	9-59 through 9-60
Davis,	Simone	Petition	05/16/22	9-59 through 9-60
Davis,	Vickie	Petition	05/16/22	9-59 through 9-60
Dawaynis		Petition	05/16/22	9-59 through 9-60
Day,	Sema	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Days,	Bonnie	Petition	05/16/22	9-59 through 9-60
Days,	Patrick	Petition	05/16/22	9-59 through 9-60
Delce,	Jelona	Petition	05/16/22	9-59 through 9-60
DeLor,	Joelle	Petition	05/16/22	9-59 through 9-60
Denton,	Elaine	Email	05/12/22	9-58
Denton,	Elaine	Email	05/12/22	9-58
Denton,	Matthew	Email	05/15/22	9-58
Denzer,	Kyle	Email	05/11/22	3-1
Dermody,	Melinda	Email	04/24/22	7-13
Dewttam,	Cameron	Petition	05/16/22	9-59 through 9-60
Dexter,	Jerome	Petition	05/16/22	9-59 through 9-60
Dixie,	Davon	Petition	05/16/22	9-59 through 9-60
Dixon,	Jaquame	Petition	05/16/22	9-59 through 9-60
Dogley,	Mahlon	Petition	05/16/22	9-59 through 9-60
Dorsey,	Angela	Petition	05/16/22	9-59 through 9-60
Dorsey,	Lamar	Petition	05/16/22	9-59 through 9-60
Dow,	Darlene	Petition	05/16/22	9-59 through 9-60
Drenton,	Fance	Petition	05/16/22	9-59 through 9-60
Drew,	Branwen	Petition	05/16/22	9-59 through 9-60
Driscoe,	Carol	Petition	05/16/22	9-59 through 9-60
DuBois,	Beth	Email	05/16/22	9-58
Ducett Jr.,	Keith	Email	05/11/22	4-8
Dudley,	Ellis	Petition	05/16/22	9-59 through 9-60
Dunlap,	Carolon	Petition	05/16/22	9-59 through 9-60
Durham,	Quincey	Petition	05/16/22	9-59 through 9-60
Durham,	Quincy	Petition	05/16/22	9-59 through 9-60
Edwards,	Dave	Email	04/15/22	4-2, 7-12
Edwards,	Dave	Email	05/10/22	4-2
Edwards,	Dave	Email	05/11/22	3-1
Edwards,	Kevan	Petition	05/16/22	9-59 through 9-60
Edwards,	Kymesha	Petition	05/16/22	9-59 through 9-60
Elliott,	Jessica	Email	05/16/22	9-58
Ellis,	Jahsiere	Petition	05/16/22	9-59 through 9-60
Ellis,	Jahsrene	Petition	05/16/22	9-59 through 9-60
Ellis,	Larry	Petition	05/16/22	9-59 through 9-60
Elmore,	Jamel	Petition	05/16/22	9-59 through 9-60
Emm,	Amy	Email	05/14/22	4-2, 8-3
English,	Trove	Petition	05/16/22	9-59 through 9-60
Erroheemrius		Petition	05/16/22	9-59 through 9-60
Erwin,	Steve	Email	05/16/22	3-1, 4-2, 4-15, 4-16, 7-4, 7-5, 7-12
Evans,	Raymundo	Petition	05/16/22	9-59 through 9-60
Everlon,	James	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Families for Lead Freedom Now! and Signatories		Letter	05/11/22	4-12, 9-31 through 9-33
Fassler,	Cary	Email	05/15/22	9-58
Fawr,	Shaheem	Petition	05/16/22	9-59 through 9-60
Ferguson,	Jahrell	Petition	05/16/22	9-59 through 9-60
Fernando,	Priyantha	Email	05/14/22	3-1
Firari,	Fairlie	Email	05/16/22	4-2
Fiskey,	Katye	Petition	05/16/22	9-59 through 9-60
Fist,	Destiny	Petition	05/16/22	9-59 through 9-60
Flagg,	David	Petition	05/16/22	9-59 through 9-60
Flagg,	Shynice	Petition	05/16/22	9-59 through 9-60
Floyil,	David	Petition	05/16/22	9-59 through 9-60
Flynn,	Dennis	Email	04/15/22	2-1, 4-2, 7-12, 8-3
Flynn,	Dennis	Email	05/16/22	3-1
Fontaine,	Evan	Petition	05/16/22	9-59 through 9-60
Fontaine,	Evan	Petition	05/16/22	9-59 through 9-60
Fontaine,	Karla	Petition	05/16/22	9-59 through 9-60
Fontaine,	Karla	Petition	05/16/22	9-59 through 9-60
Ford,	Caneisha	Petition	05/16/22	9-59 through 9-60
Forney,	Shawn	Email	05/15/22	6-1
Franklin,	Keyaisha	Petition	05/16/22	9-59 through 9-60
Frazier,	Todd	Petition	05/16/22	9-59 through 9-60
Freeman,	Albert	Petition	05/16/22	9-59 through 9-60
Freeman,	Denise	Petition	05/16/22	9-59 through 9-60
Freeman,	Jacquette	Petition	05/16/22	9-59 through 9-60
Fudge,	Catherine	Petition	05/16/22	9-59 through 9-60
Fuller,	M.	Email	04/16/22	4-2
Fuller,	M.	Email	04/16/22	4-2
Fuller,	M.	Email	04/16/22	4-2, 6-2
G.,	David	Petition	05/16/22	9-59 through 9-60
Gallagher,	Dale	Email	04/16/22	4-2, 6-5
Gallagher,	Dale	Email	04/16/22	6-1
Gallagher,	Dale	Email	04/16/22	4-2
Gallagher,	Dale	Email	05/04/22	8-1
Gallop	Chantal	Petition	05/16/22	9-59 through 9-60
Garland, Onondaga County Legislator	Charles	Email	05/03/22	8-2
Garrity,	Rose	Email	05/07/22	7-1
Genuim,	B.	Petition	05/16/22	9-59 through 9-60
Geraci,	Bob	Email	05/14/22	4-2
Germain,	Kenya	Petition	05/16/22	9-59 through 9-60
Gethers,	Linnir	Petition	05/16/22	9-59 through 9-60
Giardine,	Rex	Letter	04/23/02	4-1, 4-12, 4-17, 4-18
Gilliam,	Arlena	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Givens,	Chevella	Petition	05/16/22	9-59 through 9-60
Glazier,	Dan & Lisa Mark	Email	04/24/22	7-13
Glover,	Jkira	Petition	05/16/22	9-59 through 9-60
Glover,	Julia	Petition	05/16/22	9-59 through 9-60
Glover,	Ronnie	Petition	05/16/22	9-59 through 9-60
Gluck,	Stanley	Email	03/21/22	7-1
Gluck,	Stanley	Email	02/23/22	7-1
Gluck,	Stanley	Email	05/06/22	7-1
Goldberg,	Ellen	Email	04/24/22	7-13
Golden,	Catherine	Petition	05/16/22	9-59 through 9-60
Gonzales,	Andres	Petition	05/16/22	9-59 through 9-60
Gonzalez,	Jaileen	Petition	05/16/22	9-59 through 9-60
Gordon,	Barbara	Petition	05/16/22	9-59 through 9-60
Gordon,	Barry	Petition	05/16/22	9-59 through 9-60
Gordon,	Barry	Petition	05/16/22	9-59 through 9-60
Gordon,	Todd	Petition	05/16/22	9-59 through 9-60
Gracia,	Myrna	Petition	05/16/22	9-59 through 9-60
Graham,	Jomell	Petition	05/16/22	9-59 through 9-60
Graham,	Melissa	Petition	05/16/22	9-59 through 9-60
Grainger,	Shehon	Petition	05/16/22	9-59 through 9-60
Grant Turner,	Cath	Petition	05/16/22	9-59 through 9-60
Graston,	Johnny	Petition	05/16/22	9-59 through 9-60
Graves,	Mickey	Email	05/13/22	3-1
Green,	Kim	Petition	05/16/22	9-59 through 9-60
Green,	Lawrence	Petition	05/16/22	9-59 through 9-60
Green,	Tamisha	Petition	05/16/22	9-59 through 9-60
Greene,	Donna	Petition	05/16/22	9-59 through 9-60
Gregg,	Holland	Email	04/22/22	6-3, 8-1
Gregg,	Holland	Email	05/16/22	8-1
Gregory,	Destiny	Petition	05/16/22	9-59 through 9-60
Grenga,	Barbara	Email	05/15/22	4-2
Grevelding,	Jeff	Email	04/16/22	4-4
Greyre,	MaryJo	Petition	05/16/22	9-59 through 9-60
Griffin-Nolan	Ed	Petition	05/16/22	9-59 through 9-60
Grimes,	Diane	Email	05/15/22	9-58
Groat,	Rebecca	Email	05/15/22	4-2
Grover,	Jkira	Petition	05/16/22	9-59 through 9-60
Gunn,	Cassandra	Petition	05/16/22	9-59 through 9-60
Gunn,	Sharif	Petition	05/16/22	9-59 through 9-60
Gunnip, Onondaga County Legislator	Colleen	Letter	05/10/22	7-6, 7-7
Gursky,	Geoffrey	Letter	04/18/22	4-2, 6-4
Hackett,	Charlene	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Haley,	Francine	Email	05/02/22	8-1
Haley,	Kathleen	Email	05/16/22	9-58
Haley,	Robert	Petition	05/16/22	9-59 through 9-60
Hallihan,	John	Email	05/16/22	4-2
Hamilton,	Hazel	Petition	05/16/22	9-59 through 9-60
Hamlet,	Margo	Petition	05/16/22	9-59 through 9-60
Hamlin,	Dejour	Petition	05/16/22	9-59 through 9-60
Hankin,	Baxter	Email	05/14/22	9-58
Hanoy,	Taylor	Petition	05/16/22	9-59 through 9-60
Hargrell,	L.	Petition	05/16/22	9-59 through 9-60
Harley,	Sun	Email	05/14/22	4-2
Harper,	Terese	Petition	05/16/22	9-59 through 9-60
Harris,	Arlaina	Email	05/14/22	9-58
Harris,	Joseph	Petition	05/16/22	9-59 through 9-60
Harris,	Tara	Petition	05/16/22	9-59 through 9-60
Harris,	Tara	Petition	05/16/22	9-59 through 9-60
Harris,	Tara	Petition	05/16/22	9-59 through 9-60
Harvey,	Ron	Petition	05/16/22	9-59 through 9-60
Haskins,	Jessica	Email	05/15/22	4-2, 8-4
Hatche,	Willa	Petition	05/16/22	9-59 through 9-60
Hawkins,	Ahtia	Petition	05/16/22	9-59 through 9-60
Hawkins,	Tazir	Petition	05/16/22	9-59 through 9-60
Hayes,	Early	Petition	05/16/22	9-59 through 9-60
Hayes,	Larry	Petition	05/16/22	9-59 through 9-60
Hayes,	Sharon	Petition	05/16/22	9-59 through 9-60
Hayes, Sr.,	Larry	Petition	05/16/22	9-59 through 9-60
Haygood,	Eshella	Petition	05/16/22	9-59 through 9-60
Hazen,	Melinda	Email	05/13/22	9-58
Helmer,	Larry	Petition	05/16/22	9-59 through 9-60
Henderson,	Emanuel	Petition	05/16/22	9-59 through 9-60
Henderson,	Leslie	Petition	05/16/22	9-59 through 9-60
Herb,	Christine	Email	05/12/22	9-58
Hernandez,	Tony	Petition	05/16/22	9-59 through 9-60
Herring,	Robert	Petition	05/16/22	9-59 through 9-60
Hewett,	Marijane	Email	05/10/22	4-2
Heyward,	Francine	Petition	05/16/22	9-59 through 9-60
Hickey,	Charles	Petition	05/16/22	9-59 through 9-60
Hicks,	Keturah	Petition	05/16/22	9-59 through 9-60
Hiel,	Sherry	Petition	05/16/22	9-59 through 9-60
Hightower,	Sandra	Petition	05/16/22	9-59 through 9-60
Hill,	Rakeem	Petition	05/16/22	9-59 through 9-60
Hill, Jr.,	Clinton	Petition	05/16/22	9-59 through 9-60
Hills,	Gloria	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Hines,	Kenneth	Petition	05/16/22	9-59 through 9-60
Hines,	Shannon	Petition	05/16/22	9-59 through 9-60
Hinkle,	Leon	Email	05/14/22	9-58
Historic Oakwood Cemetery Preservation Association		Letter	05/02/22	7-11
Hithen,	Devin	Petition	05/16/22	9-59 through 9-60
Hogan,	Arthur	Petition	05/16/22	9-59 through 9-60
Holland,	Carolton	Petition	05/16/22	9-59 through 9-60
Holland,	Demura	Petition	05/16/22	9-59 through 9-60
Holland,	Denise	Petition	05/16/22	9-59 through 9-60
Holland,	Marissa	Petition	05/16/22	9-59 through 9-60
Holland,	Zyair	Petition	05/16/22	9-59 through 9-60
Holls,	Denise	Petition	05/16/22	9-59 through 9-60
Holms,	David	Petition	05/16/22	9-59 through 9-60
Honeywell,	Tammy	Email	05/15/22	9-58
Hort,	Cynthia	Petition	05/16/22	9-59 through 9-60
Hoston,	Maiya	Petition	05/16/22	9-59 through 9-60
Houze,	Quenten	Petition	05/16/22	9-59 through 9-60
Howard,	Becky	Petition	05/16/22	9-59 through 9-60
Howington,	Jamell	Petition	05/16/22	9-59 through 9-60
Huddleston,	Donald	Petition	05/16/22	9-59 through 9-60
Hudson,	Charles	Petition	05/16/22	9-59 through 9-60
Huggins,	Breana	Petition	05/16/22	9-59 through 9-60
Hughes,	James	Petition	05/16/22	9-59 through 9-60
Hunter,	C.	Petition	05/16/22	9-59 through 9-60
Hunter,	David	Petition	05/16/22	9-59 through 9-60
Hunter,	Davon	Petition	05/16/22	9-59 through 9-60
Hunter,	Tyne	Petition	05/16/22	9-59 through 9-60
Hussein,	Mohammud	Petition	05/16/22	9-59 through 9-60
Hysick,	Jim	Email	05/11/22	4-2
Isaac,	Victor	Petition	05/16/22	9-59 through 9-60
Israel,	Abraham	Petition	05/16/22	9-59 through 9-60
Israel,	Sarah	Petition	05/16/22	9-59 through 9-60
Isserlis,	Alan	Email	05/10/22	5-2
Iverson,	Caqual	Petition	05/16/22	9-59 through 9-60
Ivy Clarke,	Rachel	Email	05/13/22	9-58
Jackson,	Duran	Petition	05/16/22	9-59 through 9-60
Jackson,	James	Petition	05/16/22	9-59 through 9-60
Jackson,	Jeff	Email	04/15/22	5-1
Jackson,	Nevaeh	Petition	05/16/22	9-59 through 9-60
Jackson,	Tiffany	Petition	05/16/22	9-59 through 9-60
Jacobs,	Nanci	Email	05/16/22	3-1
Jaeksei,	Javonty	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Jamelske,	Brian	Email	05/16/22	3-1
Jenkins,	Thomas	Petition	05/16/22	9-59 through 9-60
Jennings,	John	Petition	05/16/22	9-59 through 9-60
Jennings,	Lynn	Petition	05/16/22	9-59 through 9-60
Jenson,	Mike	Petition	05/16/22	9-59 through 9-60
Jernisah, Jr.,	Horace	Petition	05/16/22	9-59 through 9-60
Jeter,	Tamika	Petition	05/16/22	9-59 through 9-60
Jetty,	William	Email	05/10/22	4-2
John,	Alfreda	Petition	05/16/22	9-59 through 9-60
Johnson,	Antwam	Petition	05/16/22	9-59 through 9-60
Johnson,	Antwanette	Email	05/13/22	9-58
Johnson,	Antwenette	Petition	05/16/22	9-59 through 9-60
Johnson,	Antwenette	Petition	05/16/22	9-59 through 9-60
Johnson,	Barbara	Email	05/13/22	9-58
Johnson,	Barbara	Email	05/14/22	9-58
Johnson,	Barbara	Petition	05/16/22	9-59 through 9-60
Johnson,	Bryce	Petition	05/16/22	9-59 through 9-60
Johnson,	DM	Email	05/13/22	3-1
Johnson,	Kayla	Email	05/13/22	9-58
Johnson,	Lance	Petition	05/16/22	9-59 through 9-60
Johnson,	Tyrena	Petition	05/16/22	9-59 through 9-60
Johnson,	Willie	Petition	05/16/22	9-59 through 9-60
Jones,	Aaron	Petition	05/16/22	9-59 through 9-60
Jones,	Crystal	Petition	05/16/22	9-59 through 9-60
Jones,	James	Petition	05/16/22	9-59 through 9-60
Jones,	Kendra	Petition	05/16/22	9-59 through 9-60
Jones,	Mural	Petition	05/16/22	9-59 through 9-60
Jones,	Nikki	Email	05/13/22	9-58
Jones,	Peggy	Petition	05/16/22	9-59 through 9-60
Jones,	Peggy	Petition	05/16/22	9-59 through 9-60
Jones,	Percy	Petition	05/16/22	9-59 through 9-60
Jones,	Sandra	Petition	05/16/22	9-59 through 9-60
Jones,	Shaunteena	Petition	05/16/22	9-59 through 9-60
Juneus,	Rachel	Petition	05/16/22	9-59 through 9-60
Kahkejian,	Deborah	Email	05/15/22	9-58
Kearse,	Doryce	Petition	05/16/22	9-59 through 9-60
Kelly,	Dan	Email	05/15/22	4-2
Kelly,	Dan	Email	04/16/22	4-2
Kelly,	Dan	Email	04/17/22	4-2
Kelly,	Jamyle	Petition	05/16/22	9-59 through 9-60
Killins,	Teri	Petition	05/16/22	9-59 through 9-60
Kincey,	Emery	Petition	05/16/22	9-59 through 9-60
Kingmen,	Michelle	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Kinney,	Trina	Email	05/14/22	4-2
Kinsey,	Monique	Petition	05/16/22	9-59 through 9-60
Klaver,	Coran	Petition	05/16/22	9-59 through 9-60
Kornbluth,	Richard	Email	05/16/22	9-58
Kraus,	Chris	Email	05/16/22	4-2
Krohl,	Dave	Email	05/16/22	4-1
Krupka,	Stanley	Email	05/02/22	6-4, 8-1
Kulmiya,	Khadija	Petition	05/16/22	9-59 through 9-60
Kulmiya,	Mahamid	Petition	05/16/22	9-59 through 9-60
Kulmiya,	Mano	Petition	05/16/22	9-59 through 9-60
Kwasnowski,	Dan	Email	05/13/22	9-58
L.,	Mark	Email	05/03/22	4-2
L.,	Vincent	Email	05/13/22	9-58
LaClair,	Mark	Email	05/15/22	4-2
LaClair,	Mark	Email	05/15/22	4-2
Landless,	Gavin	Email	05/12/22	9-58
Lane,	Aggie	Email	05/16/22	9-58
Lane,	Aggie	Petition	05/16/22	9-59 through 9-60
Lang,	Kobe	Petition	05/16/22	9-59 through 9-60
Lankh,	Bruce W.	Petition	05/16/22	9-59 through 9-60
Lared		Petition	05/16/22	9-59 through 9-60
LaSide,	Jaqueline	Petition	05/16/22	9-59 through 9-60
Last,	Athena	Email	05/13/22	9-58
Last,	Athena	Email	05/13/22	9-58
Lawrence,	George	Email	05/12/22	5-3
Lawrence,	Shatek	Petition	05/16/22	9-59 through 9-60
Lawson,	Alex	Email	05/14/22	9-58
Lawson,	Jane	Petition	05/16/22	9-59 through 9-60
Lee,	Stephanie	Email	05/16/22	9-58
Leonard,	Mary	Petition	05/16/22	9-59 through 9-60
Lewis,	Minchin	Email	04/21/22	8-1
Leyikorn,	Ruphert	Petition	05/16/22	9-59 through 9-60
Liehs,	Doris	Email	05/13/22	4-2
Lindsey,	Tashmia	Petition	05/16/22	9-59 through 9-60
Liney,	Ulandrio	Petition	05/16/22	9-59 through 9-60
Linkinhoker,	Kim	Email	05/13/22	9-58
Linkinhoker,	Steven	Email	05/13/22	9-58
Little,	Sonia	Petition	05/16/22	9-59 through 9-60
Littlefield,	Kate	Email	05/13/22	9-58
Lopez,	Hector	Petition	05/16/22	9-59 through 9-60
Lopez,	Nicole	Petition	05/16/22	9-59 through 9-60
lordchico001		Email	04/15/22	4-2, 4-6, 8-3
Lowe,	Mary	Email	05/16/22	8-1

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Lower,	Kylee	Petition	05/16/22	9-59 through 9-60
Luckman,	Glen	Petition	05/16/22	9-59 through 9-60
Lynch,	Brian	Email	04/25/22	7-13
Lynne,	Howard	Email	05/16/22	3-1
Machell,	Karen	Email	05/13/22	9-58
Maddox,	Orlando	Petition	05/16/22	9-59 through 9-60
Maddox,	Orlando	Petition	05/16/22	9-59 through 9-60
Mager,	Andy	Petition	05/16/22	9-59 through 9-60
Magnarelli, NYS Assemblymember	William	Letter	05/09/22	9-61 through 9-62
Mahnigh,	Doreen	Petition	05/16/22	9-59 through 9-60
Malik,	Linda	Email	05/13/22	9-58
Mallory,	Ulysses	Petition	05/16/22	9-59 through 9-60
Mantos,	Angie	Petition	05/16/22	9-59 through 9-60
Marshall,	S.	Petition	05/16/22	9-59 through 9-60
Martino,	Jeff	Email	05/15/22	3-1
Martino,	Karen	Email	05/12/22	4-2
Marusa,	Joseph	Email	05/16/22	9-58
Marzug,	K.	Petition	05/16/22	9-59 through 9-60
Mathis,	Andrew	Petition	05/16/22	9-59 through 9-60
Maxwell,	Jessica	Petition	05/16/22	9-59 through 9-60
McCarthy,	Jerry	Email	05/13/22	3-1
McCarthy,	Peter	Email	05/13/22	9-58
McCarthy,	Peter	Email	05/15/22	9-58
McCarthy,	Peter	Email	05/15/22	9-58
Mccg,	John	Petition	05/16/22	9-59 through 9-60
McCoy,	Nancy	Petition	05/16/22	9-59 through 9-60
McGloun,	Avae	Petition	05/16/22	9-59 through 9-60
McGlown,	Amonie	Petition	05/16/22	9-59 through 9-60
McMillian,	Linda	Petition	05/16/22	9-59 through 9-60
McMorlen,	Quinasat	Petition	05/16/22	9-59 through 9-60
McMullen,	Pat	Petition	05/16/22	9-59 through 9-60
McSher,	Megan	Petition	05/16/22	9-59 through 9-60
Mediavilla,	Melissa	Petition	05/16/22	9-59 through 9-60
Medina,	Herbertio	Petition	05/16/22	9-59 through 9-60
Medley,	William	Petition	05/16/22	9-59 through 9-60
Megens-Sedor,	Astrid	Email	05/08/22	7-17
Merritt,	Jonas	Petition	05/16/22	9-59 through 9-60
Middlebrooks,	J.	Petition	05/16/22	9-59 through 9-60
Mike,	Charles	Petition	05/16/22	9-59 through 9-60
Mike,	Shaundell	Petition	05/16/22	9-59 through 9-60
Miko,	James	Petition	05/16/22	9-59 through 9-60
Milani,	Michelle	Email	05/15/22	9-58

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Miller,	Johanna	Email	05/12/22	9-58
Miller,	Johanna	Email	05/12/22	9-58
Miller,	Julia	Email	05/02/22	8-1
Miller,	Julia	Email	05/12/22	8-1
Miller,	Julia	Email	05/12/22	8-1
Miller,	Laura	Letter	05/15/22	6-7
Minor,	Patricia	Email	05/02/22	8-1
Mitchell,	David	Email	04/28/22	7-2
Mitchell,	Isarah	Petition	05/16/22	9-59 through 9-60
Mitchell,	Monique	Petition	05/16/22	9-59 through 9-60
Mohamed,	Ali	Petition	05/16/22	9-59 through 9-60
Moneti,	Carlo	Email	05/16/22	4-12, 4-13
Monroe,	Eddie	Petition	05/16/22	9-59 through 9-60
Montage,	Shomel	Petition	05/16/22	9-59 through 9-60
Montgomery,	Brian	Petition	05/16/22	9-59 through 9-60
Montgomery,	Brian	Petition	05/16/22	9-59 through 9-60
Moodliar,	Kira	Petition	05/16/22	9-59 through 9-60
Moodliar,	Suren	Petition	05/16/22	9-59 through 9-60
Moore,	Starlease	Petition	05/16/22	9-59 through 9-60
Moore,	Yolanda	Petition	05/16/22	9-59 through 9-60
Morelli,	Linda	Email	05/16/22	3-1
Morris,	Derek	Petition	05/16/22	9-59 through 9-60
Mortis,	Teresa	Voicemail	05/16/22	5-1
Mukoma,	Halima	Petition	05/16/22	9-59 through 9-60
Mullen,	Ron	Email	05/16/22	4-2
Munson,	Annie	Petition	05/16/22	9-59 through 9-60
Myers,	Ashley	Petition	05/16/22	9-59 through 9-60
Nagy,	Caroline	Petition	05/16/22	9-59 through 9-60
Neal,	Acinon	Petition	05/16/22	9-59 through 9-60
Neilon,	Sally	Petition	05/16/22	9-59 through 9-60
Neville,	Kevin	Email	05/16/22	9-58
Neville,	Lisa	Email	05/16/22	9-58
Nevith,	Quinntekush	Petition	05/16/22	9-59 through 9-60
New York Civil Liberties Union		Letter	05/16/22	4-1, 9-48 through 9-57
New York Civil Liberties Union		Petition	05/16/22	9-59 through 9-60
Newton,	Diane	Petition	05/16/22	9-59 through 9-60
Nicholas,	Richard	Email	05/12/22	5-2
Ninemilerocks90		Email	05/11/22	4-2
Noble,	Leslie	Email	05/15/22	9-58
Nolan,	Marcia	Email	05/16/22	3-1
Nooreldin		Petition	05/16/22	9-59 through 9-60
Nyman,	Constance	Petition	05/16/22	9-59 through 9-60
Oboyle,	Magdalene	Email	05/13/22	9-58

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Ocon,	Adam	Email	04/13/22	4-2, 5-1, 5-2
Ocon,	Addison	Email	05/13/22	5-2
Odan,	James	Petition	05/16/22	9-59 through 9-60
Odom,	Khari	Petition	05/16/22	9-59 through 9-60
Ogletree,	Mark	Petition	05/16/22	9-59 through 9-60
Oliver,	Shameka	Petition	05/16/22	9-59 through 9-60
Onondaga County Legislature		Letter	05/03/22	9-61 through 9-62
Ortiz Amet,	Kassandra	Petition	05/16/22	9-59 through 9-60
Ortiz,	Kimberly	Petition	05/16/22	9-59 through 9-60
Osman,	Aden	Petition	05/16/22	9-59 through 9-60
Ousher,	Michael	Petition	05/16/22	9-59 through 9-60
Overend,	Emily	Petition	05/16/22	9-59 through 9-60
Owens,	Rena	Petition	05/16/22	9-59 through 9-60
Owens-Chaplin,	Lanessa	Petition	05/16/22	9-59 through 9-60
P.,	Joan	Email	05/12/22	4-2
Pace Jr.,	Edgar	Petition	05/16/22	9-59 through 9-60
Pace,	Larry	Petition	05/16/22	9-59 through 9-60
Pace,	Malaysha	Petition	05/16/22	9-59 through 9-60
Paniagua,	Rita	Email	05/15/22	9-58
Park,	Wahevrely	Petition	05/16/22	9-59 through 9-60
Parks,	Diana	Petition	05/16/22	9-59 through 9-60
Paro,	Nick	Letter	04/21/22	9-61 through 9-62
Partila,	Carl	Petition	05/16/22	9-59 through 9-60
Patton,	Chamber	Petition	05/16/22	9-59 through 9-60
Patton,	William	Email	05/10/22	3-1
Paulnack,	Austin	Email	05/15/22	9-58
Pernia,	Marianna	Petition	05/16/22	9-59 through 9-60
Perry,	Pamela	Petition	05/16/22	9-59 through 9-60
Perry,	Theresa	Petition	05/16/22	9-59 through 9-60
Pertille, Jr.,	Carl	Petition	05/16/22	9-59 through 9-60
Peters,	Robert	Email	05/10/22	4-2
Peters,	Robert	Email	05/13/22	4-2, 5-1
Petty,	Christopher	Petition	05/16/22	9-59 through 9-60
Pfeffer,	Ashley	Petition	05/16/22	9-59 through 9-60
Philos,	S.	Petition	05/16/22	9-59 through 9-60
Phodhin,	N.	Petition	05/16/22	9-59 through 9-60
Picciotto,	Lynn	Petition	05/16/22	9-59 through 9-60
Pierce-El,	Charles	Petition	05/16/22	9-59 through 9-60
Pietrafesa,	Richard	Email	05/16/22	4-2
Pines,	Aleki	Petition	05/16/22	9-59 through 9-60
Podkowinski,	David	Email	05/12/22	2-1
Polhamus,	Katherine	Petition	05/16/22	9-59 through 9-60
Poole,	Rosa	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Pope,	Bessie	Petition	05/16/22	9-59 through 9-60
Pope,	Yolanda	Petition	05/16/22	9-59 through 9-60
Popy,	Janice	Petition	05/16/22	9-59 through 9-60
Pouseleeh,	Priscila	Petition	05/16/22	9-59 through 9-60
Prehn,	Phil	Email	05/13/22	9-58
Prehn,	Philip	Petition	05/16/22	9-59 through 9-60
Price,	Nelson	Email	05/15/22	9-58
Princeton,	Abrille	Petition	05/16/22	9-59 through 9-60
Prinle,	Donte	Petition	05/16/22	9-59 through 9-60
Prouty-Greene,	Charmaine	Email	05/02/22	4-2, 8-1, 8-3
Pulley,	Jahasia	Petition	05/16/22	9-59 through 9-60
Purser,	Gretchen	Email	05/15/22	9-58
Putter,	Walter	Petition	05/16/22	9-59 through 9-60
Pyramid Management Group & Destiny USA		Email	05/16/22	9-67
Quan		Petition	05/16/22	9-59 through 9-60
Quartier,	Thomas	Email	05/12/22	8-1
Quinn,	Madison	Email	05/14/22	9-58
Quinn,	Madison	Email	05/14/22	9-58
R.,	Erica	Email	05/13/22	9-58
R.,	Josiah	Petition	05/16/22	9-59 through 9-60
R.,	Tymeka	Petition	05/16/22	9-59 through 9-60
Raacha,	Barbadu	Petition	05/16/22	9-59 through 9-60
Raffaldi,	Thomas	Email	05/15/22	3-1
Rajil,	Jamile	Petition	05/16/22	9-59 through 9-60
Randall,	Shirley	Petition	05/16/22	9-59 through 9-60
Rankin,	Annie	Petition	05/16/22	9-59 through 9-60
Ratcliff,	Sean	Petition	05/16/22	9-59 through 9-60
Ratcliff,	Shirley	Petition	05/16/22	9-59 through 9-60
Ray,	Bobby	Petition	05/16/22	9-59 through 9-60
Raymond,	Dennis	Email	04/15/22	4-2
Reaves,	Clairice	Petition	05/16/22	9-59 through 9-60
Reaves,	Craig	Petition	05/16/22	9-59 through 9-60
Reese,	Hope	Petition	05/16/22	9-59 through 9-60
Reese,	Jimmie	Petition	05/16/22	9-59 through 9-60
Reeves,	Mary	Petition	05/16/22	9-59 through 9-60
Relonvou,	Rodrick	Petition	05/16/22	9-59 through 9-60
Rende,	Thomas	Email	05/14/22	9-58
Renth,	Ronalde	Petition	05/16/22	9-59 through 9-60
Ricciardiello,	Luccia	Email	05/12/22	9-58
Ricciardiello,	Luccia	Email	05/12/22	9-58
Rice,	Karla	Petition	05/16/22	9-59 through 9-60
Rice,	Timothy	Email	05/14/22	9-58

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Richards,	Jocelyn	Email	05/16/22	9-58
Richardson,	Haywood	Petition	05/16/22	9-59 through 9-60
Richardson,	John	Petition	05/16/22	9-59 through 9-60
Ricoloiza		Petition	05/16/22	9-59 through 9-60
Riddick,	Carol	Petition	05/16/22	9-59 through 9-60
Riddick,	Carol	Petition	05/16/22	9-59 through 9-60
Rivera,	Ileana	Petition	05/16/22	9-59 through 9-60
Rivera,	Julianna	Petition	05/16/22	9-59 through 9-60
Rivers,	Glover	Petition	05/16/22	9-59 through 9-60
Roberts,	Sam	Petition	05/16/22	9-59 through 9-60
Robinson,	Alana	Petition	05/16/22	9-59 through 9-60
Robinson,	Antoinette	Petition	05/16/22	9-59 through 9-60
Robinson,	Delmar	Petition	05/16/22	9-59 through 9-60
Robinson,	Greg	Petition	05/16/22	9-59 through 9-60
Robinson,	Robert	Petition	05/16/22	9-59 through 9-60
Robinson,	Shaf	Petition	05/16/22	9-59 through 9-60
Robo,	Nuriyo	Petition	05/16/22	9-59 through 9-60
Rolling,	Meshae	Email	05/16/22	9-58
Rosario,	Jose	Petition	05/16/22	9-59 through 9-60
Rose,	Deborah	Email	05/12/22	9-58
Rose,	Deborah	Email	05/12/22	9-58
Royal,	Kathy	Petition	05/16/22	9-59 through 9-60
Rufus,	David	Petition	05/16/22	9-59 through 9-60
Rufus,	Martel	Petition	05/16/22	9-59 through 9-60
Rufus,	Tammy	Petition	05/16/22	9-59 through 9-60
Rufus,	Tammy	Petition	05/16/22	9-59 through 9-60
Rupert,	Mark	Petition	05/16/22	9-59 through 9-60
Russell,	Alicia	Petition	05/16/22	9-59 through 9-60
Russell,	N.	Petition	05/16/22	9-59 through 9-60
Russo,	Charles	Email	05/15/22	9-58
Rutledge,	Seth	Email	05/13/22	3-1
Ryan,	Bethanie	Email	05/13/22	9-58
Sabene,	Judy	Email	05/10/22	4-2
Sage,	Gloria	Email	05/02/22	7-16, 8-1
Sandens,	Lemel	Petition	05/16/22	9-59 through 9-60
Sangster,	Collin	Email	05/15/22	4-2
Santiago,	Oscar	Petition	05/16/22	9-59 through 9-60
Sarason,	Robert	Petition	05/16/22	9-59 through 9-60
Sargent,	Todd	Email	04/15/22	4-2
Sargent,	Todd	Email	04/15/22	8-4
Sarno,	Joseph	Email	05/16/22	4-2
Schalk,	John	Email	04/18/22	7-18
Schlamger,	Craig	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Schleicher,	B.	Email	05/14/22	4-11
Scott,	Delevon	Petition	05/16/22	9-59 through 9-60
Scott,	Diana	Petition	05/16/22	9-59 through 9-60
Scott,	Diane	Petition	05/16/22	9-59 through 9-60
Scott,	Kary	Petition	05/16/22	9-59 through 9-60
Scudder,	Lisa	Petition	05/16/22	9-59 through 9-60
Scudder,	Octavia	Petition	05/16/22	9-59 through 9-60
Seigel,	Bonita	Email	05/12/22	9-58
Selimoric,	Muhamed	Petition	05/16/22	9-59 through 9-60
Senior,	Carlisha	Petition	05/16/22	9-59 through 9-60
Senter,	A.	Petition	05/16/22	9-59 through 9-60
Sest,	Cal	Petition	05/16/22	9-59 through 9-60
Shabazz,	Amar	Petition	05/16/22	9-59 through 9-60
Shamsa		Petition	05/16/22	9-59 through 9-60
Shard,	Anthony	Petition	05/16/22	9-59 through 9-60
Sharif,	Madina	Petition	05/16/22	9-59 through 9-60
Sheed,	Gerevt	Petition	05/16/22	9-59 through 9-60
Sheridan,	John	Email	05/14/22	9-58
Sheridan,	John	Email	05/15/22	9-58
Sheridan,	John	Petition	05/16/22	9-59 through 9-60
Shorter,	Leon D.	Petition	05/16/22	9-59 through 9-60
Shoultz,	Bonnie	Petition	05/16/22	9-59 through 9-60
Shuman,	Victoria	Petition	05/16/22	9-59 through 9-60
Siegel,	Bonita	Petition	05/16/22	9-59 through 9-60
Simmons,	Bertha	Petition	05/16/22	9-59 through 9-60
Simmons,	Patricia	Email	05/14/22	3-1
Simpson,	Faith Gilliam	Petition	05/16/22	9-59 through 9-60
Sinatra,	Christopher	Email	05/13/22	9-58
Single,	Marissa	Petition	05/16/22	9-59 through 9-60
Singletary,	Yuvette	Petition	05/16/22	9-59 through 9-60
Skilonger,	Amy	Petition	05/16/22	9-59 through 9-60
Slabowski,	Jane	Email	05/14/22	9-58
Slade,	Don	Email	05/15/22	4-2
Smari,	Delongida	Petition	05/16/22	9-59 through 9-60
Smith,	Barbara	Email	05/16/22	4-2
Smith,	Bessie	Petition	05/16/22	9-59 through 9-60
Smith,	Brian	Email	05/16/22	4-2
Smith,	Charmain	Petition	05/16/22	9-59 through 9-60
Smith,	Dick	Email	05/16/22	4-2
Smith,	Marion	Petition	05/16/22	9-59 through 9-60
Smith,	Mike	Petition	05/16/22	9-59 through 9-60
Smith,	Quenzell	Petition	05/16/22	9-59 through 9-60
Smokes,	D.	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Smokes,	Theresa	Petition	05/16/22	9-59 through 9-60
Snell,	Becky	Email	05/15/22	6-1
Spann,	Jerrin	Petition	05/16/22	9-59 through 9-60
Spellman,	Ernestine	Petition	05/16/22	9-59 through 9-60
Stackhouse,	Richard	Petition	05/16/22	9-59 through 9-60
Stackhouse,	Sandra	Petition	05/16/22	9-59 through 9-60
Starling,	Karen	Petition	05/16/22	9-59 through 9-60
Stewart,	Ida	Petition	05/16/22	9-59 through 9-60
Stewart,	Wilson	Petition	05/16/22	9-59 through 9-60
Stowell,	Theresa	Email	05/12/22	9-58
Stroman,	April	Petition	05/16/22	9-59 through 9-60
Stroman,	George	Petition	05/16/22	9-59 through 9-60
Stroman,	Henry	Petition	05/16/22	9-59 through 9-60
Stroman,	Jeraline	Petition	05/16/22	9-59 through 9-60
Stromen,	Diane	Petition	05/16/22	9-59 through 9-60
Suto,	Yashira	Petition	05/16/22	9-59 through 9-60
Swan,	Kim	Petition	05/16/22	9-59 through 9-60
Swann,	Courtney	Petition	05/16/22	9-59 through 9-60
Swanson,	Miriam	Email	05/14/22	4-2
Sweet,	Kashalon	Petition	05/16/22	9-59 through 9-60
Sweet,	Kashalon	Petition	05/16/22	9-59 through 9-60
T.,	Anthony	Petition	05/16/22	9-59 through 9-60
T.,	Paul	Email	05/13/22	3-1
Talar,	James	Petition	05/16/22	9-59 through 9-60
Taliners		Petition	05/16/22	9-59 through 9-60
Tanguay,	Patricia	Email	05/14/22	4-2, 8-4
Tartaro,	Anthony	Email	05/11/22	4-2
Taylor,	Frank	Email	05/15/22	3-1
Taylor,	Valerie	Petition	05/16/22	9-59 through 9-60
Terry,	Clayton	Email	05/16/22	9-58
Thomas,	Amaia	Petition	05/16/22	9-59 through 9-60
Thomas,	Glory	Email	05/13/22	9-58
Thomas,	Glory	Email	05/13/22	9-58
Thomas,	Gwendolyn	Petition	05/16/22	9-59 through 9-60
Thomas,	Henry	Petition	05/16/22	9-59 through 9-60
Thomas,	Kahari	Petition	05/16/22	9-59 through 9-60
Thomas,	Karin	Email	05/10/22	4-2
Thomas,	Major	Petition	05/16/22	9-59 through 9-60
Threachil,	India	Petition	05/16/22	9-59 through 9-60
Thurman,	Alexander	Petition	05/16/22	9-59 through 9-60
Tiffany,	Ann	Email	05/14/22	9-58
Tillie,	Junguem	Petition	05/16/22	9-59 through 9-60
Tillie,	Otis	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Todisco,	Joe	Email	05/16/22	4-2, 5-1
Todzia,	Frank	Email	04/16/22	4-2
Topor,	Nick	Email	05/02/22	8-1
Town of Camillus		Letter	04/21/22	9-61 through 9-62
Town of Cicero		Letter	04/21/22	9-61 through 9-62
Town of Clay		Letter	04/21/22	9-61 through 9-62
Town of DeWitt		Letter	04/21/22	9-61 through 9-62
Town of DeWitt		Letter	05/13/22	9-63
Town of Elbridge		Letter	04/21/22	9-61 through 9-62
Town of Lysander		Letter	04/21/22	9-61 through 9-62
Town of Manlius		Letter	04/25/22	9-61 through 9-62
Town of Marcellus		Letter	04/21/22	9-61 through 9-62
Town of Onondaga		Letter	04/21/22	9-61 through 9-62
Town of Pompey		Letter	04/21/22	9-61 through 9-62
Town of Salina		Email	04/19/22	9-61 through 9-62
Town of Skaneateles		Letter	04/20/22	6-6, 9-61 through 9-62
Town of Van Buren		Letter	04/21/22	9-61 through 9-62
Trendell,	Herbert	Email	05/16/22	4-2
Tull,	Sheila	Petition	05/16/22	9-59 through 9-60
Turner Willacy,	Sherry	Petition	05/16/22	9-59 through 9-60
Turner,	Jai'Nia	Petition	05/16/22	9-59 through 9-60
Turnquest,	Chanel	Email	05/13/22	9-58
U.S. Environmental Protection Agency		Letter	05/13/22	9-1 through 9-5
UNITEHERE Local 150, AFL-CIO		Letter	05/13/22	8-1
UNITEHERE Local 150, AFL-CIO		Letter	05/15/22	6-8
Upstate Medical University, OHCC		Letter	05/16/22	9-34 through 9-47
V.,	Michele	Petition	05/16/22	9-59 through 9-60
Valentino,	Darren	Petition	05/16/22	9-59 through 9-60
Vallelonga,	Damian	Email	05/13/22	9-58
VanDelinder,	Nancy	Petition	05/16/22	9-59 through 9-60
Vanouse,	Donald	Email	05/15/22	9-58
Velazquez,	Destiny	Petition	05/16/22	9-59 through 9-60
Venture,	Tom	Email	05/02/22	6-1, 8-1
Vishnesky,	Phillip	Email	05/02/22	8-1
W.,	Jennifer	Petition	05/16/22	9-59 through 9-60
Wagner,	Helen	Petition	05/16/22	9-59 through 9-60
Wagner,	Jack	Petition	05/16/22	9-59 through 9-60
Walker,	Deondra	Petition	05/16/22	9-59 through 9-60
Walker,	Dezi	Petition	05/16/22	9-59 through 9-60
Walker,	Kerry	Petition	05/16/22	9-59 through 9-60
Walker,	R.M.	Email	05/16/22	4-2
Walters,	Deziree	Petition	05/16/22	9-59 through 9-60

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Walton,	Shanee	Petition	05/16/22	9-59 through 9-60
Warner,	Hilary	Petition	05/16/22	9-59 through 9-60
Warren,	Lisa	Petition	05/16/22	9-59 through 9-60
Washu,	Darle	Petition	05/16/22	9-59 through 9-60
Washu,	Mary	Petition	05/16/22	9-59 through 9-60
Watkins,	Laddyle	Petition	05/16/22	9-59 through 9-60
Watson,	Vynce	Petition	05/16/22	9-59 through 9-60
Weather,	Kire	Petition	05/16/22	9-59 through 9-60
Weathers,	Dawn	Petition	05/16/22	9-59 through 9-60
Weeks,	Brenda	Email	05/16/22	4-2
Welch,	Rosemary	Petition	05/16/22	9-59 through 9-60
Wenthen,	Carole	Email	05/13/22	8-4
Wentworth,	Dan	Email	05/10/22	3-1
West,	Laurel	Petition	05/16/22	9-59 through 9-60
Wheeler,	Margaret	Petition	05/16/22	9-59 through 9-60
White,	Aaron	Petition	05/16/22	9-59 through 9-60
White,	Brenda	Petition	05/16/22	9-59 through 9-60
White,	Maurice	Petition	05/16/22	9-59 through 9-60
White,	Wenoblyn	Petition	05/16/22	9-59 through 9-60
Whitehiet,	Jonathan	Petition	05/16/22	9-59 through 9-60
Whitlock,	Sade	Petition	05/16/22	9-59 through 9-60
Wiedor,	Duane	Email	05/02/22	8-1
Willacy,	Stanley	Petition	05/16/22	9-59 through 9-60
Williams III,	Eddie Lee	Petition	05/16/22	9-59 through 9-60
Williams,	Alexander	Petition	05/16/22	9-59 through 9-60
Williams,	Frank	Petition	05/16/22	9-59 through 9-60
Williams,	Gerald	Petition	05/16/22	9-59 through 9-60
Williams,	Isaiah	Petition	05/16/22	9-59 through 9-60
Williams,	Jan	Petition	05/16/22	9-59 through 9-60
Williams,	Jeremy	Petition	05/16/22	9-59 through 9-60
Williams,	Judy	Petition	05/16/22	9-59 through 9-60
Williams,	Lillie	Petition	05/16/22	9-59 through 9-60
Williams,	Martikah	Email	05/16/22	9-58
Williams,	Michael	Petition	05/16/22	9-59 through 9-60
Williams,	Pamela	Petition	05/16/22	9-59 through 9-60
Williams,	Qiana	Email	05/16/22	9-58
Williams,	RaShad	Petition	05/16/22	9-59 through 9-60
Williams,	Sheldon	Letter	05/15/22	4-2, 8-1
Williams,	Sheldon	Voicemail	05/13/22	2-3
Williams,	Sonya	Petition	05/16/22	9-59 through 9-60
Willis,	Bobbie	Petition	05/16/22	9-59 through 9-60
Winte,	E.	Petition	05/16/22	9-59 through 9-60
Woiler,	Mary Ellen	Email	04/25/22	7-13

Last Name/Affiliation *	First Name	Comment Type	Date	Comment Number(s)
Wolf,	Elaine	Email	05/14/22	9-58
Woman,	Cachet	Petition	05/16/22	9-59 through 9-60
Wood,	Charles	Email	04/19/22	4-5
Woodfork,	Terry	Email	05/13/22	9-58
Woodworth,	Janet	Email	05/15/22	9-58
Works,	Tawasha	Petition	05/16/22	9-59 through 9-60
Worley,	Raheem	Petition	05/16/22	9-59 through 9-60
Wrying,	Luther	Petition	05/16/22	9-59 through 9-60
Zavaglia,	Julian	Email	05/13/22	9-58
Zhe-Heimerman,	Jeremy	Petition	05/16/22	9-59 through 9-60
Zwir,	John	Email	05/12/22	4-2
	Alidi	Petition	05/16/22	9-59 through 9-60
	Anthony	Petition	05/16/22	9-59 through 9-60
	Ayri	Petition	05/16/22	9-59 through 9-60
	Brian	Voicemail	05/16/22	4-2
	C.	Petition	05/16/22	9-59 through 9-60
	Campbell	Voicemail	05/12/22	4-2, 5-2
	Curt	Petition	05/16/22	9-59 through 9-60
	Eric	Petition	05/16/22	9-59 through 9-60
	Evan	Petition	05/16/22	9-59 through 9-60
	Gregory	Petition	05/16/22	9-59 through 9-60
	James	Petition	05/16/22	9-59 through 9-60
	Jason	Voicemail	05/16/22	4-2
	Jean & David	Email	05/14/22	4-2
	Jerry	Email	05/02/22	8-1
	Jerry	Email	04/16/22	8-4
	Jerry	Email	04/16/22	8-4
	Jim	Petition	05/16/22	9-59 through 9-60
	Larry	Petition	05/16/22	9-59 through 9-60
	Linda	Email	05/15/22	3-1
	Madeline	Petition	05/16/22	9-59 through 9-60
	Rthulsl	Email	04/15/22	4-3
	Seronly	Petition	05/16/22	9-59 through 9-60
	Shavry	Petition	05/16/22	9-59 through 9-60
	Stuart	Petition	05/16/22	9-59 through 9-60
	Tatianna	Petition	05/16/22	9-59 through 9-60
	Todd	Petition	05/16/22	9-59 through 9-60

** Please note that Petitioners' names were transcribed to the best of our ability.*