



SDEIS Correctness/Technical Comments

1. Cover/Title page: remove all dates as these actions have not yet taken place.
Response: The dates have been removed
2. Cover/Title page: add Draft Title so it reads Supplemental Draft Environmental Impact Statement

Draft has been added to the title
3. Cover/Title page: include 700 Smith Boulevard Road location as well
Response: 700 Smith Boulevard has been added to the location
4. Correct the header and footer throughout to reflect the correct project name and document name.
Response: The header and footer has been corrected.
5. Page 1-5: correct section heading to be Supplemental Draft Environmental Impact Statement (remove Generic).
Response: The term Generic has been removed
6. Section 1.6, Second paragraph, Page 1-11: change reference of FGEIS to FSEIS.
Response: This change has been made.
7. Section 2.5, Page 2-10: There is discussion of the use of double silt fence, diversion swales and turbidity curtains. In reviewing the submitted site plans, none of these features are being identified for use.
Response: The diversion swales are shown on the erosion and sediment control plans. We have added the buffer to maintain the existing vegetation along the Hudson River frontage. Along the Normanskill silt fence has been changed to be a double silt fence. Turbidity curtains will be utilized during the wharf construction when disturbance will occur below the MHHW elevation as shown in the conceptual wharf erosion and sediment control design plans provided as Appendix G of the Storm Water Pollution Prevention Plan.

8. Section 2.6, Page 2-12: Further explanation of the Albany County Planning Board's jurisdiction is required and needs to reference General Municipal Law (GML) referral that is a statutory requirement. As written, it suggests their regulatory role is diminished.

Response: This section has been updated as follows: Albany County Planning Board will review this project pursuant to the NYS General Municipal Law Section 239 that requires all proposed projects that are within 500 feet of a State highway be reviewed by the local County Planning Board. The County Planning Board review the project and render a decision to approve, deny or make recommendations for the Lead Agency to consider.

9. Section 2.6, Page 2-12: Since work will occur within the City of Albany, the applicant shall confirm whether permitting and/or approval is required from the Albany Department of Water and Water Supply for stormwater discharges and project specific SWPPP as well as any other water system improvements that may be necessary within their jurisdictional boundaries.

Response: A separate SWPPP and permitting will be required through the City of Albany for the work proposed within the city limits. The City of Albany is a MS4 community as such, the SWPPP will be reviewed and approved by the City's MS4 Officer. Coordination is ongoing with the City and the site plan approvals and permitting will occur after the coordinated SEQR process is complete.

10. Section 2.6, page 2-13, first full paragraph: add Section 2.7 Purpose and Process of SEQRA heading before the text describing this section. (Note: the text is accurate, the sub section heading is missing)

Response: Heading has been added.

11. Section 1, Page 1-3, Table 1.3-1, Section 3.2: The proposed mitigation mentions the implementation or inclusion of adequate riparian buffers for fish and wildlife habitat. It is unclear in the accompanying site plan where such riparian buffers are being proposed.

Response: Riparian buffer is proposed to remain along the majority of the Hudson River waterfront as shown within the updated site plans.

12. Section 3.1, page 3-5: Describe how the presence of coal fly ash is addressed and how the assessment and remediation of potential contaminants will be conducted per NYSDEC Division of Environmental Remediation Technical Guidance DER-10.

Response: The soils at the Beacon Island parcel were addressed in the FGEIS. Since completion of the FGEIS, a Soil Management Plan (SMP) has been developed by Atlantic Testing Laboratories and details the procedures for excavation, disposal, and remediation of the coal fly ash impacted soils. A copy of the SMP has been included in Appendix A. The SMP was reviewed by NYSDEC on August 4, 2021. A revised Soil Management Plan addressing NYSDEC's comments was submitted to NYSDEC on August 16, 2021. Additionally, SMP was developed by CHA Consulting, Inc., for the 700 Smith Boulevard Parcel and is also included as Appendix A.

13. Section 3.7 Traffic and Transportation, page 3-40: See comments below related to TIS.

14. Section 1, Page 1-5, Table 1.3-1, Section 3.9: The table notes that adequate capacity exists within the City of Albany's water system to support the development at 700 Smith Blvd. This is outside of the Town of Bethlehem's jurisdiction and therefore, formal documentation should be provided from the City of Albany to support this statement.

Response: The proposed development will construct a 19,600 square foot building (Building E) with a calculated water demand of 1,100 GPD with a peak flow rate of 62 gpm. A total of 4 buildings are in the process of being demolished on the project site and the proposed building will have a similar water demand as those previous 4 buildings combined. An existing 8" water main traverses through the site as well as an existing 12" sanitary main. A request for a formal statement from the City of Albany has been submitted and will be provided upon receipt.

15. Section 1, Page 1-5 Table 1.3-1, Section 3.10: The table notes that adequate capacity exists within the existing sewer system to support the development at 700 Smith Blvd. This is outside of the Town of Bethlehem's jurisdiction and therefore, formal documentation should be provided from the City of Albany and/or Albany County Sewer District to support this statement.

Response: See response to #14 above.

16. Section 3, Page 3-1: The applicant has represented that an internal roadway will need substantial rehabilitation between the Bethlehem site and Albany site. This may be necessary to now mention as it was not clearly identified in the GEIS.

Response: Roadway extension to the proposed bridge as well as rehabilitation is being completed as part of this project and the Normanskill Roadway Rehabilitation plans have been included in the latest submission to the Town.

17. Section 3, Figure 3.4-2 Floodplain Analysis: Figure is missing from the document.

Response: Figure is no longer applicable.

18. Section 3.6.1: The NYSDEC by correspondence dated August 13, 2021 notes the potential need for a Title V Facility Permit. The need for such a permit needs to be covered and the technical aspects mentioned in the NYSDEC correspondence should be fully addressed. Should this permit be deemed necessary, there would be a need to update Section 2.6 of the SEIS accordingly.

Response: The proposed action remains below the major facility thresholds as per 6 NYCRR 231-13.1. This will be accomplished by constructing the facility as proposed, and operating and maintaining emission sources and related air pollution control equipment in accordance with good air pollution control practices at all times. The NYSDEC Air State Facility Permi has been added to Section 2.6. Air Emission Analysis has been included as Appendix E2.

19. Section 3.8.2 Page 3-52: The National Grid property is to include water quality control measures with an outlet to the existing wetlands where it functions as storage during flood events. The design approach previously discussed included the benefit of discharging to tidal waters or a 5th order water body. The means to manage and mitigate water quantity for the parking lot does not appear to follow that or at least suggests the wetlands will provide the quantity control without and quantitative analysis. There needs to be an analysis of water quantity control measures will be provided since the adjacent wetlands do not appear to be tidal or a 5th order water body.

Response: The SWPPP provides details on the water quality treatments prior to discharging into the adjacent wetlands. The drainage report provides the HydroCAD calculations confirming that the existing 42" pipe that outlets the wetlands into the Normanskill has adequate capacity to accommodate the increase in flows associated with the project which will be discharged prior to any regional flooding from the Hudson River.

20. Section 3.8.2, Page 3-52: The applicant has represented that an internal roadway will need substantial rehabilitation between the Bethlehem site and Albany site. There needs to be a discussion of how the disturbances associated with the road construction will be classified (new impervious or existing disturbed impervious) and whether Chapter 4 and/or Chapter 9 of the NYS Design Manual apply as far as water quality and quantity controls.

Response: See response to #16 and the updated SWPPPs submitted. The existing roadway will be extended to the proposed Normanskill bridge and WQv mitigation will be provided in the proposed stormwater facilities. The remainder of the road will be repaved with subbase to remain and not create any NYSDEC defined disturbance.

21. Section 3.8.2 , Page 3-52- There is discussion about the use of bioretention infiltration for water quality control, however no soil tests (infiltration tests or deep hole test pits) have been performed on site for the design. The location of the bioretention facilities is located near the wetlands which may make the 2-feet of separation to groundwater problematic to achieve. It is further noted that the draft SWPPP submitted does not include any supporting calculation for the use of bioretention as a water quality treatment.

Response: The proposed stormwater facility design is included in the updated SWPPP as stormwater ponds due to the high groundwater; however, it is assumed that some infiltration within the pond bottoms will occur. As discussed in the SWPPP, the runoff reduction volumes will intentionally not be met due to Coal Ash contamination present within the bulk of the site.

22. Section 3.8.3, Page 3-53: There needs to be mention of the City of Albany's MS4 regulatory jurisdiction for work within the City of Albany.

Response: The City of Albany's jurisdiction has been added to the narrative of this section.

23. Section 3.9, Page 3-54: For any portions of work within the City of Albany, there should be more substantive discussion relating to the City's water system and its ability to meet the needs of the improvements proposed at 700 Smith Blvd.

See response to item #14 above.

24. Section 3.14, page 3-66 through 3-67: Include discussion of the City of Albany Comprehensive Plan and compatibility of proposed action with that plan.

Response: Discussion regarding the City of Albany's Comprehensive Plan has been added to Section 3.14

25. Section 3.14, page 3-66: The LWRP was adopted on March 24, 2021. The SDEIS should reflect this.

Response: SEIS was updated to include this.

26. Section 3.15 Emergency Services, page 3-68: It appears that no mitigation is proposed. If that is correct, the section should state that no mitigation is proposed. Also provide confirmation from emergency service providers that they can still serve the project with the additional proposed height.

Response: The narrative has been updated to reflect that no mitigation is proposed. The APDC met with all emergency service providers and will serve letters are pending.

27. Section 3.17 Fiscal and Economic Impact, page 3-70: include that information referenced within this section and include the detailed reference within the FGEIS.

Response: A detailed reference has been added and the Fiscal Report from the FGEIS has been included as Appendix J.

28. Appendix I- Waterfront Assessment Form, Item C – Waterfront Assessment, Question #2(c): Change answer to Yes and explain in Section D. The proposed action can have a positive effect as well and this is likely to have a positive effect on the Operation of the State's major ports.

Response: Change has been made to the Waterfront Assessment form.

29. Add the revised PPP as an appendix to address the EJ mitigation associated with the addition of 700 Smith Boulevard.

Response: The revised and enhanced PPP has been added as an appendix.

30. Comments received from NYSDEC, dated August 13, 2021 should be included in an Appendix. All comments should be thoroughly addressed in the SDEIS and reference the August 13, 2021 DEC letter in Appendix "X" when doing so.

Response: The NYSDEC comment letter, dated August 13, 2021, has been added as an appendix and comments have been addressed both in a letter response and in the narrative of the SEIS.

31. The Planning Board learned at its August 17, 2021 meeting that the proposed

manufacturing operation is intended to be a 24-hour operation. Provide an evaluation of potential noise impacts of a 24-hour operation and, if necessary, identify proposed mitigation.

32. **Response:** As stated in the FGEIS a 24-hour operation was contemplated and addressed for this industrial site. Operations will be performed in compliance with current land use, zoning and applicable municipal ordinances. Additionally, the manufacturing process will be performed completely indoors with a state-of-the-art technology and motors covered with insulated material. Therefore, increase in ambient or background noise would be less than significant, if any.

In addition, traffic noise within the Project Area is expected from heavy trucks traveling through the Project and yard areas. Noise levels from the typical heavy trucks that are expected to operate at the Project Area may produce maximum noise levels (intermittent) of up to 75 dBA at the reference distance of 50 feet (according to the USDOT Federal Highway Administration Construction Noise Handbook). According to the fundamentals of noise propagation, sound pressures from stationary or slow-moving objects will decrease (attenuate) at a rate of 6 dB each time the distance away is doubled. At a distance of 150 feet, the noise will attenuate to approximately 65 dBA. The preliminary site plans show the roadway used by trucks will bring deliveries from the 700 Smith Boulevard material receiving site will traverse down Normanskill Street and the proposed bridge over the Normans Kill to the site. The primary truck deliver route to each building on the yard side is more than from 150 feet, at its closest, to the property line. As a result, the Project will comply with the Town noise ordinance.

Furthermore, all truck traffic in connection to the Project, including construction vehicles, will be routed through the existing City Streets through the Port District to avoid traveling on South Pearl Street through the Ezra Prentice community.

SDEIS Appendix G – Traffic Impact Statement

33. The City of Albany will need to provide review and comments on the property located within their jurisdiction.

Response: Duly noted. The City of Albany will review the Traffic impact study as part of the SEQRA coordinated review process.

34. NYSDOT will need to provide review and comment as this project impacts NY Routes 32 and 144.

Response: NYSDOT is listed as an involved agency and will review the TIS in Section 2.6. APDC has met with the DOT and follow up coordination is pending.

35. Page 1: Report states data received from Marmen Welcon indicates numbers of trips during peak hours. Identify what this data based on and explain how the data was developed. Include discussion in the report addressing the origin and development of this data.

Response: Employee numbers per shift were provided by Marmen and used for the traffic impacts study which conservatively assumed that all trips during the morning and evening shift changes would occur during the existing offsite peak traffic hours. Additional details are provided in the traffic impact study.

36. The modifications to the driveway access at NY Route 144 will require review and approval by NYSDOT.

Response: Coordination is on-going with NYSDOT on the proposed driveway location and geometry.

37. Figures 2A and 2B: Some of the Phase II volumes are not correct. Volumes need to be verified and updated accordingly.

Response: This has been updated in the TIS.

38. Page 15: 2029 Full Build Volumes are presented in Figure 7, not Figure 5.

Response: This has been updated in the TIS.

39. Table 4, AM Peak Hour: NYS Route 32 at South Port Road intersection incorrectly labeled as Un-Signalized.

Response: This has been updated in the TIS.

40. Page 22: Describe how will clearing be performed on land not owned by the Port on the north side of NY Route 144 to achieve required sight distances for the 55-mph speed as shown in Table 5.

Response: The proposed areas to be cleared are all within NYSDOT ROW. Coordination have been ongoing with NYSDOT regarding the proposed clearing. Details will be worked out during the highway work permit plan approval process.

41. Explain why only three (3) intersections discussed in the analysis. Discussion of all study area intersections need to be included.

Response: The generic EIS traffic impact study reviewed all the study area intersections previously. Only 3 intersections will see different traffic patterns/volumes from what was previously analyzed in the GEIS. The GEIS traffic study was already approved by the Town and NYSDOT, therefore the intersections with equal or lesser traffic than what was already approved in the GEIS were not included.

42. The modifications to the driveway access at NY Route 144 will require review and approval by NYSDOT as it differs from prior FGEIS.

Response: Coordination is on-going with NYSDOT on the proposed driveway location and geometry.

43. Signal Warrant: The satisfaction of signal warrant thresholds by themselves do not mean

a traffic signal should be installed. The traffic signal warrants will require NYSDOT review and approval.

Response: Agreed and this has been stated in the TIS.

44. Conclusions: Third bullet states “additional traffic generated by the proposed Port of Albay expansion along River Road will have a negligible impact on the operations of the NYS Route 144 (River Road) corridor, as well as South Port Road.” Without including analysis results for all intersections within the study area, this conclusion can’t be verified. Include analysis results of all study area intersections with new distribution and volumes for this specific development.

Response: The generic EIS traffic impact study reviewed all the study area intersections previously. Only 3 intersections will see different traffic patterns/volumes from what was previously analyzed in the GEIS. The GEIS traffic study was already approved by the Town and NYSDOT, therefore the intersections with equal or lesser traffic than what was already approved in the GEIS were not included.

45. Figure 7C: The lines drawn for left into the site (445 ft) and right out of the site (530 ft) appear to be the same length. This figure is misleading and should be modified.

Response: The figure has been updated to show the lines to scale.

46. Identify how safety and speed concerns will be addressed for new driveway access both during construction and post-construction.

Response: Additional language has been added to the TIS to discuss safety and Speed in the TIS.

47. Bethlehem Planning Staff’s recent discussions with the Police Department have identified the Department’s concerns regarding the left turn access from River Road into the sight should the roadway posted speed limit be maintained at 55mph. A meeting with the Bethlehem Police Department may be appropriate to discuss these concerns.

Response: APDC met with all emergency responders including the Police Department. At this meeting the APDC discussed as stated in the TIS, adequate intersection sight distance can be obtained for the proposed left turn. APDC also discussed the meeting with the DOT in which the DOT mentioned that they conducted a speed study and is reluctant to reduce the speed limit.

SEQR Compliance Document Comments

48. Rework the first paragraph to indicate this is a SEQR compliance document and indicate the purpose of the compliance document. For example, the purpose of the SEQR compliance document is to evaluate mitigation measures identified in the Findings Statement issued by the Planning Board as Lead Agency on June 2, 2020 and to confirm the mitigation identified for this proposed action is compliant with those measures. This first paragraph reads as a Finding Statement, which this is not.

Response: Introduction paragraph has been reworded. The purpose of this SEQRA compliance document is to evaluate mitigation measures identified in the Findings Statement issued by the Planning Board as Lead Agency on June 2, 2020, and to confirm the mitigation identified for this proposed action is compliant with those measures.

49. For all sections, remove statement that *“The Planning Board finds the proposed action will not significantly impact ‘insert topic’ Potential impact will be minimized and mitigated to the maximum extent practicable as set forth above.”* Again, this is language from a Findings Statement, which this document is not.

Response: Addressed, these statements have been removed.

50. For all sections, the compliance document should identify each mitigation measure included in the adopted Findings Statement and clearly identify if that mitigation measure is applicable to the proposed action, if there is new or changed mitigation based on the action or if there is no mitigation needed and describe why.

Response: The applicant understands that such a document will be made part of the conditions of site plan approval prepared by the Planning Board.

51. Throughout document – remove any reference to Findings Statement in the footer.

Response: References to the Findings Statement has been removed from the footer.

52. Include specific dates for supporting documenting referenced:
- a. Page 3 – Soil Management Plan (SMP) dated October 23, 2020 and found within the appendices of the Joint Permit Application Package
 - b. Page 4 – Sediment Sampling and Analysis Plan dated September 24, 2020 and found within the appendices of the Joint Permit Application Package
 - c. Page 10 – SWPPP

Response: Specific dates have been added for the referenced documents.

53. Section 3.0 page 3 – replace ‘impacts’ with mitigation. This document is examining compliance with mitigation measures, not impacts.

Response: Comment addressed. Section 3.0 now reads “Compliance with Environmental Mitigation

54. Section 3.1, page 4 – there is no indication of the mitigation measure identified in the Findings Statement page 7, letter P “Once a specific tenant and project is identified, noise from the proposed project will be addressed and if necessary a noise barrier along the western property line could be constructed. “ Please address.

Response: The Project will not exceed ambient or background noise levels from a typical industrial facility. Additionally, the manufacturing process will be performed completely indoors with a state-of-the-art technology and motors covered with insulated material.

Therefore, increase in ambient or background noise is not expected. All outdoor activity is limited to transportation equipment moving materials / tower sections to and from buildings; to storage and loading onto shipping vessels. The buildings provide a noise barrier for the closest residences to the west from the activities in the storage yard and wharf.

Furthermore, all truck traffic in connection to the Project, including construction vehicles, will be routed through the existing City Streets through the Port District to avoid traveling on South Pearl Street through the Ezra Prentice community.

55. Section 3.1-B, page 3 – confirm whether or not the SMP has been approved by DEC.

Response: The SMP dated October 2020 was reviewed by DEC on August 04, 2021. Final SMP addressing all agency comments was provided to NYSDEC on August 16, 2021.

56. Section 3.6, page 14 – Findings Statement mitigation measures K (tenant operations requiring spray paint booth) and M (vegetative buffers to remain) are missing. Please explain.

Response: Section 3,6 has been updated. The Project is committed to minimize its environmental footprint on neighboring communities, especially nearby disadvantaged communities. The Project will institute as needed mitigation strategies and procedures, and utilizes high precision, state-of-the-art manufacturing equipment and technologies at its facilities. During the operational phase, the employees will receive on the job, site specific training, with emphasis on worker safety, pollution prevention and environmental compliance.

The project will perform metallizing activities completely indoors with a state-of-the-art capture and staged filtration and ventilation system, which recirculates purified air indoors. The project will also institute state-of-the-art VOC control on its paint booths using recuperative thermal oxidizers. Use of the VOC control equipment will result in a significant decrease in the project's potential to emit VOC (overall decrease of more than 100 tpy in potential VOC emissions) and HAP (overall decrease of more than 60 tpy in potential HAP emissions). Likewise, with the project utilizing state-of-the-art dust suppression (particulate control) on its abrasive blast equipment and its paint booths, particulate (PM_{2.5}). The combined effect of implementing these mitigation measures leads to significant reductions in the project's potential emissions.

57. Section 3.7 Traffic and Transportation, page 9 – 10 – this section is missing multiple critical mitigation measures identified within the Findings Statement. Please address all mitigation measures identified in the Findings Statement or explain why these measures are not proposed (make the connection between the previous TIS and the most recent TIS).

Response: Section 3.7 has been updated to include all the previous mitigation findings from the June 2, 2020 findings statement. The GEIS traffic study findings were replaced with the current tenant specific traffic study findings.

58. Section 3.12, page 12 - Findings Statement mitigation measure H (buffer of on-site existing vegetation will be maintained) is missing. Please explain.

Response: Section 3.12 has been updated. Existing vegetation along the western riverbank of the Hudson River will remain in its natural state as a vegetation (riparian) buffer.

59. Section 3.12, page 3-60: Assess the potential impact of the additional height on residential properties along Old River Road. If there are impacts, describe and identify mitigation (whether already proposed mitigation from Findings Statement or new mitigation to address added height).

Response: A photo simulation was prepared along Old River Road and provided in the SDEIS. The simulation demonstrates that the visual impact associated with the increase in building height is insignificant.

One of the buildings will exceed the allowable height and thus will pursue a variance for the height of the building. Although the building will exceed the allowable height, it is still in keeping with the surrounding area; there are buildings on the adjacent properties to both the north (Agway Industrial Park) and the south (PSEG) that are industrial in nature and contain structures that exceed the allowable 65' in height.

Based upon the visualizations created and summarized above the following mitigations are proposed.

Location 1: This viewshed is from the approaching access road through an existing industrial area. The access road is not a heavily trafficked thoroughfare and is only anticipated to be used by people accessing the site; furthermore, it is not practical to screen the project from the access road. No additional mitigation is recommended at this location.

Location 2: This viewshed is within the access easement to the northern portion of the property. The project has chosen not to use this access easement instead leaving the existing vegetation in place to screen the project from both NYS Route 144 and the residence to the northwest. At this location the project is viewed through the high voltage transmission lines originating at the PSEG plant and the existing railroad bed. The existing vegetation does screen the majority of the project and no further mitigation is recommended at this location.

Location 3: This viewshed is within the right of way of NYS Route 144. The existing berm, screening the project from NYS Route 144, has been retained to the greatest extent possible. While the project can be seen from this location, it is anticipated that a viewer in a moving vehicle would only be able to see the project for the briefest of moments. No additional mitigation is recommended at this location.

Location 4: This viewshed is from Glenmont Road at a higher elevation and west of the project. The project is only slightly visible from this location. The vast majority of the project is screened by existing vegetation with only the very tops of the buildings visible.

No additional mitigation is recommended at this location.

Location 5: This viewshed is from the Hudson River. The eastern side of the project is completely visible from this location. Along this stretch of the Hudson, many of the uses with direct river frontage are industrial, and views from the Hudson are already significantly impacted by the presence of these uses, particularly the PSEG to the south. Directly across to the Hudson on the east bank are multiple bulk oil storage facilities. Directly to the north is the existing Port of Albany. No additional mitigation is recommended at this location.

Additional mitigation undertaken to minimize the effects of this project on the surrounding visual landscape are as follows. The northern access easement to NYS Route 144 will not be utilized, so as not to create a visual opening in this area. The building colors will be chosen to blend into the existing surroundings. All lighting on the project will be full cut off, dark sky compliant and will not spill onto neighboring properties.

Based on existing barriers including buildings and vegetation within the 0.4 miles between Ezra Prentice community and the supplemental Project Area, it is not anticipated that the Project Area will be visible from the Ezra Prentice community. As such, no impacts to the aesthetic and visual resources of the Ezra Prentice community are expected and no mitigation measures are proposed.

60. Check the formatting and numbering of sections following page 12. There are two Section 3.12 and 3.11.

Response: Numbering of sections has been corrected.

61. There is no content for Section 3.12 Community Character and Compatibility with Comprehensive Plan (It appears to be the Emergency Services mitigation measures)

Response: section 3.14 has been added. The Project will help achieve the goals in the City's Comprehensive plan listed above by creating jobs and will help New York State in achieving its renewable energy goals by providing additional port infrastructure, warehouse space, cargo and wharf capacity necessary for the manufacturing and distribution of wind turbine components. The Project will leave a vegetative buffer (existing vegetation to remain) along the western riverbank of the Hudson River, which will aid with community character, compatibility, sustainability and resiliency. The project has been designed to account for potential sea level rise per NYSDEC guidelines.

Additionally, the Project avoids relocation or acquisition of residential, commercial or industrial properties.

62. Emergency Services section heading is missing.

Response: Emergency services heading was added as section 3.15.

63. Section 3.17-C, page 15 – this appears to be an impact with no mitigation identified. Identify the mitigation measure to address.

Response: Section has been updated to include the mitigation. A total of 38 indirect jobs are expected to be created in the Town of Bethlehem and 364 indirect jobs in Albany County. The Project avoids relocation or acquisition of residential, commercial or industrial properties.

64. Sections 4, 5, 6, 7, 8 and 9 are not relevant for a SEQR compliance document. Please remove.

Response: Sections have been removed.

65. List of acronyms – change the title of this page to SEQR Compliance Document in place of Findings Statement.

Response: Change was completed.