



American Planning Association
New York Metro Chapter

Making Great Communities Happen

July 6, 2009

Ms. Katie Kendal
General Counsel
Mayors Office of Environmental Coordination
253 Broadway, 14th Floor
New York, NY 10007

Dear Katie:

On behalf of the New York Metro Chapter (the Metro Chapter) of the American Planning Association (APA), I want to thank you for this opportunity to submit suggestions to your office regarding the 2009 City Environmental Quality Review (CEQR) Technical Manual Update. The Metro Chapter of the APA is a 1,200 member organization serving New York City, Long Island and the Lower Hudson Valley. We are a local chapter in the larger 41,000 member American Planning Association, which is a national organization of professionals dedicated to creating livable communities of lasting value. The Metro Chapter is particularly committed to promoting planning-related public education, encouraging broad participation in planning decisions, and collaborating with other organizations to advocate the highest standards of the profession. Our membership represents diverse interests and perspectives and is comprised of planners, designers, engineers and others from both the private and public sector who are involved in environmental and general planning for the region's communities, including the City of New York. We address local issues here in the City that affect the physical, social, natural and economic environments of the region on a daily basis. Indeed, many in our local chapter work with environmental review matters on a daily basis as either a primary or secondary responsibility in their professions.

Our APA Chapter commends the Mayor's Office on your efforts to move forward with the 2009 CEQR Technical Manual update. The Manual is an important technical guidance document for our members and has also been used as a guide in other municipalities in the region as a way of addressing environmental review matters under the State Environmental Quality Review Act (SEQRA).

We thank you for inviting us to attend your stakeholders meeting on May 20th, 2009 and requesting our input and comments in this update. The suggestions we provide below are a follow-up to that meeting and range from the general to the procedural and specific that we trust will be useful in the update. In addition to these comments, our Chapter would like to take this opportunity to state that we encourage the City to use CEQR not just as a mechanism for tallying individual project impacts, but as an important step in setting the stage for informed long-term environmental planning and analysis in New York City (e.g., coordinating City-

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wide wetland mitigation priorities, transit improvements, water quality improvements, noise controls).

Overall Comments

- APA Metro Chapter is of the opinion that the overall process of environmental review (which began in the early 1980's) along with local decision making has been significantly improved with the guidance of the City Environmental Quality Review (CEQR) Technical Manual as was first instituted in 1993. We believe the proposed 2009 improvements can continue the City's efforts to improve this process. We also recognize that, while considered guidance by the City, the Manual is often employed in practice as a code or regulation which can lead to overly lengthy documents and delays. The text of the Manual should acknowledge the latitude and flexibility in applying the Manual for Lead Agency use and the interpretation and "reasonableness" that can be applied under CEQR on a case by case basis.
- We support creating a Short Environmental Assessment Statement (EAS) Short Form for CEQR and updating the Long Form EAS and its related procedures for the purposes of facilitating targeted EIS reviews, particularly for the purposes of streamlining the process for smaller and mid sized projects.
- We support improving the review process by strengthening Lead Agency decision making and minimizing the practice of Lead Agency deferral to City advisory agencies that sometimes results in long waiting periods for internal feedback, which can substantially delay the environmental review process. Practice has shown that staffing levels in all agencies that are addressing CEQR review projects are consistently inadequate to address the workload. This leads to delays of months and longer in the review of draft documents for both public and privately sponsored projects throughout the City. Therefore, it is critical that the City improve the staffing and uses resource better under an interagency coordination process. Lastly, CEQR fees should be dedicated to the CEQR process.
- Updates and annual review via website-posted technical memos or related methods and approaches are encouraged as a technique for allowing and publicizing the necessary evolution of the Manual (e.g., changes in trip generation and student generation rates). The process should facilitate regular, clearly noted, updates (e.g., Technical Memoranda posted on the Office of Environmental Coordination [OEC] website). This could also include individual City agency memos related to CEQR implementation that could also be posted.
- Mitigation need not always come at the end of the process and the Manual should recognize impact avoidance measures that can be included in a proposed project or action for the purposes of avoiding impacts rather than mitigating. While each Technical Guidance chapter (see Chapter 3) concludes with mitigation strategies, the Manual should also stress that the "mitigation measures" applied to project design as "impact avoidance" is also encouraged. This not only reduces the need or mitigation, but can also serve to ensure its implementation.



- Each technical guidance section in Chapter 3 also concludes with an examination of alternatives. The Manual can be streamlined for easier use if the format followed the structure of a typical Environmental Impact Statement (EIS), where alternatives are examined at the end of the documents. To that end, the technical guidance alternatives should be cross-referenced and summarized in “Chapter 3U: Alternatives” and summarized in this chapter as to their applicability in the EIS process. Here also, the Manual can acknowledge that alternatives developed during a design process can be described in the EIS Project Description, thereby describing the evolution of a project design and presented in the framework section of the description.
- We recommend summarizing much of the data collection methods presented in the Chapter 3 Technical sections and moving the more extensive discussions of the study area determinations, data needs and baseline data collection methods to an Appendix. Doing so would reduce the size of the main document and, in turn, focus the discussion towards the important elements of determining impact significance, the need for mitigation and the evaluation of alternative, which are the critical conclusions of the CEQR findings.
- We support shorter targeted versions of EIS that are user friendly to the general public.
- Construction impacts are contained within each Technical Guidance chapter; however, it may be more appropriate to have them consolidated into one location, Chapter 3S Construction. This may also serve to minimize some redundancy on the EIS process as well.

Chapter 1: Procedures

- Expand the discussion on procedures and process related to coordinated review when State and Federal actions are involved in a proposed project or action such as permitting or environmental review to support funding sources that are subject to State Environmental Quality Review (SEQR) and/or the National Environmental Policy Review Act (NEPA). This is of particular importance for projects along the waterfront, where the City’s environmental review processes can often overlap with the review requirements of the Army Corps of Engineers (ACE) and the New York State Department of Environmental Conservation (DEC).
- Add ULURP agency timeframes and flowchart with required comments periods etc. (e.g., FEIS must be completed 10 days before a City Planning Commission vote). (See page 1-11.)
- Identify methods of determination for CEQR review for City agencies implementing capital projects.
- Include discussion on 30-day agency review period for EAS’s and issuance of Negative Declarations



- Add text defining a Lead Agency 3 day goal for EAS/EIS distribution to advisory agencies with a 60-day turnaround for Lead Agency review on all first submissions and 30 days turnarounds for subsequent submissions.
- Acknowledge the role of designated Critical Environmental Areas in the CEQR process (e.g., Jamaica Bay). (Page 2-10.)
- A City-specific Type II list (exempt actions) is encouraged.

Chapter 2: Establish the Analysis Framework

- Expand description of Reasonable Worst Case Development Scenario (RWCDs) based on experiences with City areawide zoning actions (page 2-2) and provide additional RWCDs examples in an Appendix.
- Provide greater clarity on the need for cumulative impact analyses for specific projects and the conditions and circumstances in which cumulative assessments are appropriate. Cumulative impacts from proposed actions or project should also include the net effects due to recent, proposed or simultaneous downzoning or related actions that reduce approved density or development in a particular study area. (See page 2-7/2—8.)
- We recommend the discussion of choosing the analysis year, the study area, and the existing and future conditions be shortened (pages 2-4 through 2-11) as much of this text seems redundant of the Technical Guidance Chapters (see the discussion below).

Chapter 3: Technical Guidance

Chapter 3A: Land Use, Zoning and Public Policy

- Summarize the data gathering and move much of the discussion of data collection methods to an Appendix.
- Update for zoning discussions for special zoning districts and current zoning changes (e.g., bicycle parking, fresh food stores, etc.). (See page 3a-3.) Update for new public policies (e.g., PlanNYC). (See page 3A-5.)
- Review impacts mitigation section as the text is currently somewhat confusing and such impacts are rare—it is more common for a project to incorporate site design and project design techniques that avoid impacts, rather than identify them as mitigation under CEQR. (Page 3A-43.)
- Similarly, clarify the role of the alternatives discussion and/or cross-reference to Chapter 3U: Alternatives. (See Page 3A-13.)

Chapter 3B: Socioeconomics

- Summarize the data gathering methodology and move much of the discussion of data collection methods to an Appendix.



- Overall, the approach to the socioeconomic assessment in the Manual establishes essentially a five-step process for determining impacts. However, additional clarity is needed on the basis for determining impact significance within these categories, and additional examples providing thresholds of significance would be useful. (See, for example, pages 3B-6, affects on property values.)

Chapter 3C: Community Facilities

- Summarize the data gathering and move much of the discussion of data collection methods to an Appendix.
- Update for new thresholds. (See Tables 3C-1.)
- Allow for periodic website updates so that analyses can be used based on common current data (e.g., school data and student generations rates, day care).

Chapter 3D: Open Space

- In our collective experiences, few if any projects meet the City's open space guidance values as presented in the Manual. These values should be modified and the issue addressed with greater clarity in the update to better represent conditions in New York City.
- Summarize the data gathering and move much of the discussion of data collection methods to an Appendix.
- Increase thresholds for detailed quantified analysis for commercial and residential impact assessments as open space impacts rarely occur with projects under the current thresholds. (See pages 3D-3.)
- Revise methods for assessing open space adequacy and impact assessment methodologies and impact determinations, which can be overly complex and confusing (e.g., 200 or more residents, 500 or more employees; see pages 3D-12 through 3D-15).

Chapter 3E: Shadows

- Update methodology for current software programs that provide shadow diagrams. (See page 3E-1.)
- Explore the possibility of providing for different screening-level height zones (e.g., the 50-foot screening) that represents the various built forms around the City (e.g., heights in Central Business Districts as opposed to lower rise neighborhoods).
- Identify differing levels of impact significance for shadows falling on different types of open space, such as active and passive areas. (See page 3E-19.)



- Identify plant species that are either more sensitive or less sensitive to changes in sunlight intensity due to shadows. (See page 3E-19.)
- Clarify impact significance and historic resources mitigation. (See page 3E-19.)

Chapter 3F: Historic Resources

- Provide additional text on Section 106 and State/Federal coordination with respect to historic resources review process. (Page 3F-14.)
- Provide additional text on LPC review and determinations for archaeological and architectural significance (page 3F-14) and provide a sample of the LPC form for reviewing archaeological and architectural significance in the Appendix.
- Add text on special concerns and procedures relative to potential Native American remains. (Page 3F-15.)
- Provide a general discussion of the process for performing field testing when that testing is performed after completion of environmental review (i.e., as part of project implementation, preconstruction [preferred] or construction) and discuss the related procedures for LPC and/or SHPO review. (Page 3F-16.)
- Provide additional examples of design and adaptive reuse mitigation. (Page 3F-17.)

Chapter 3G: Urban Design/Visual Resources

- Cross-reference City zoning text that in many ways reflects an urban design strategy or visual character features of the City (e.g., parking lot design and tree-planting requirements, special natural area protections, special waterfront regulations, etc. and their relevance to this analysis. (See pages 3G-5 and 3G-7.)
- Consider additional text applicable to sidewalk/pedestrian wind analyses.
- Add text on the Hudson River as a significant scenic coastal resource as determined by DOS.

Chapter 3H: Neighborhood Character

- Mitigation and alternatives are generally addressed in other technical areas, but, in practice, examination of mitigation and alternatives is rare in this technical area. It is likely that the mitigation text here could be eliminated (stating it is addressed elsewhere in the Manual) or shortened. (See page 3H-4.)

Chapter 3I: Natural Resources

- Summarize the data gathering and move much of the discussion of data collection methods to an Appendix.
- Expand discussion and references to ecological community examples (Section 130) and provide new reference materials, images, maps and online websites to reflect current availability.



- Update Section 700 “Regulations and Coordination” as necessary, including sections on stormwater management and best management practices, expand on discussion relative to Jamaica Bay and Combined Sewer Overflow (CSO) abatement, Long Term Control Plans , ACE coastal studies for the South Shore of Staten Island, etc. (Page 3I-48.)
- Provide discussions addressing the CEQR approach to addressing the effects of sea level rise.
- Provide input from the City’s Wetlands Task Force and coordinated wetland mitigation efforts for City projects.
- Identify circumstances and cases where water quality modeling may be appropriate.
- Describe differences in concern with respect to riverine and tidal flooding and the affects on a floodplain. Also, address the issue of appropriate street and base floor elevations in flood hazard areas (along with sea-level rise) both here and in Chapter 3H “Natural Resources.” (See page 3I-38.)

Chapter 3J: Hazardous Materials

- Update for current approaches and procedures under mitigation. (Page 3J-14.)
- Update mitigation approaches and procedures relative to the City’s Brownfield Program and Mayor’s Office of Environmental Remediation review; add links to brownfield database. (Page 3J-18.)
- Update for procedures and circumstances for using Part 375 soil standards and applicability for projects with state/federal involvement. (Page 3J-14.)

Chapter 3K: Waterfront Revitalization Program

- Mitigation in this technical area is rare as projects must be consistent with the policies in order to be approved. It is therefore recommended that the mitigation and alternatives sections of this chapter be eliminated or shortened. (Page 3K-11.)
- Address the issue of sea-level rise in coastal zone management.

Chapter 3L: Infrastructure

- Add updates on stormwater management, stormwater pollution prevention plans, and best management practices for stormwater management and treatment and requirements during construction under the State Pollution Discharge Elimination System (SPDES) act (construction disturbance of sites 1 acre or greater in size). (Page 3L-12.)
- Add guidance as to when modeling analyses of CSO impacts are appropriate and provide methodologies. (Page 3L-11.)



- Update for current City infrastructure programs and projects (e.g., water supply and conservation, Long Term Control Plans and CSO abatement). Page 3L-13.)
- Move Table 3L-3 to an Appendix. (Page 3L-15.)
- Address the issue of appropriate street and base floor elevations in flood hazard areas (along with sea-level rise) both here and in Chapter 3H “Natural Resources.” (See also the discussion above.)

Chapter 3M: Solid Waste and Sanitation Services

- Include guidance on significance and impact thresholds. (Page 3M-4.)
- Update for goals of current Solid Waste Management Plan. (Page 3M-5.)
- Provide tables for solid waste generation rates and recycling rates as well as the current recycling techniques and objectives of the City. (Page 3M-5, Table 3M-1.)

Chapter 3N: Energy

- Add text on energy demand reduction and City objectives with respect to Greenhouse Gas emissions. (Page 3N-2.)

Chapter 3O: Traffic and Parking

- Trip generation rates and traffic standards in the Manual do not currently provide good guidance and are outdated (both to general analytic method and changing street policies). They are also inflexible and need to be regularly updated and reflect the various trip generation characteristics that are found around the City for the variety of uses (e.g., Midtown and Staten Island).
- Provide methods for determining parking rates/needs for public park open space uses.
- Transportation impact analysis should be based on the cumulative movement of people (maximizing person trips via all modes), as opposed to maintaining vehicular LOS.
- Vehicular off-street parking should not be analyzed for impacts, as it's primarily a response to market conditions.
- Trip generation rates from ITE Trip Generation Manual are not appropriate to most of urban NYC. NYC should develop its own trip generation rates from locally collected data, varied by neighborhood type.
- Provide methods for developing parking demand rates for open space and uses other than the traditional residential and commercial development uses.

Chapter 3P: Transit and Pedestrians

General:

- Level of service tables are reversed; corridors and ramps have higher capacities and thus higher LOS thresholds. (See page 3P-6.)



- Bus capacities for standard and articulated buses were modified to 65 and 93, respectively. However, due to recent conversions of much of the standard bus fleet to “low-floor” models, the 65-person capacity had been reduced to 54 in recent studies. (See pages 3P-9 and 3P-15.)
- For the stairway analysis the definition of V_{na} should be amended to read “No Action” pedestrian volumes or LOS C/D, whichever is greater. The equation came from Fruin who wrote the book on pedestrian analysis many years ago, and it was not envisioned in that study that certain projects could create such huge increments on transit elements as occurs under CEQR. So, if one uses the formula for a stairway element that declines from LOS B to LOS E under CEQR, the analysis will disclose a mitigation that would bring service back to LOS B. Instead, the required widening should only be made to meet acceptable LOS C/D level. (See page 3P-14.)
- For determining impacts on turnstiles, escalators, elevators and high-wheel exits, the 1.00 v/c threshold fails at LOS E/F, not LOS C/D as stated in the text. (See pages 3P-14 and the differences in sliding scales between these elements and stairways on pages 3P-6 and 3P-8.)

Screening Thresholds:

- The current generalized 200 peak-hour-trip threshold should be refined to reflect the specific transit and pedestrian elements that may or may not need to be analyzed. (See page 3P-1.) For subway vertical circulation elements (stairways and escalators), the 200-trip threshold seems appropriate.
- For subway control areas, the threshold should be increased significantly to 500 peak-hour trips in most cases. For a typical control area containing 5 turnstiles, the 15-minute capacity would be $5 \times 32 \times 15 = 2,400$. An increase of 500 peak hour trips would translate to a peak 15-minute increment of approximately 140, which is about 5 percent of the control area’s capacity. Discretion could be used here, based on knowledge of the control area, to determine whether a detailed analysis is warranted.
- For bus line haul, the 200-trip threshold could actually be a bit too liberal at times. This is because the bus line haul capacity is not a fixed entity. Rather, it depends on the service schedule. So it is more appropriate to screen the need for a bus line haul analysis in the same manner as in a subway analysis. In the latter, the 5-person increment per car threshold is generally used and this increment can represent a 3-5% of typical subway cars’ guideline capacity (120-180). Using similar reasoning, the bus line haul analysis threshold could be 3 additional passengers per bus, which would be 3-6% of a bus’s capacity (54-93).
- For pedestrian elements, the current Manual suggests discretion in deciding whether detailed analyses are needed. (See pages 3P-1 and 3P-2.) One would not expect to see a pedestrian impact for most projects situated outside of the Manhattan core (south of 96th Street and along 125th Street), downtown Brooklyn, Long Island City, Flushing and Jamaica. Different sets of thresholds defined by general areas of the City are recommended. Perhaps 300 pedestrian



trips could be a more reasonable threshold for the denser areas with 400 pedestrian trips for the balance of the City.

- For corners and crosswalks, the 200-trip threshold seems appropriate for denser areas of the City. However, a 300-trip threshold may be more reasonable for the rest of the City.

Transit Impacts: Assessment of Significance:

- The process of determining subway and bus line-haul impacts of significance is not clear in the current Manual when the “No Action” condition ridership is already projected to be over capacity. A revision here is likely to require discussions with NYCT. But one can infer from the analysis thresholds described above and say that more than a 5-person increase per train car over capacity or more than 3 additional passengers per bus over capacity would be considered the minimum requirements for impact determination. (See pages 3P-14 and 3P-15.)

Pedestrian Impacts: Assessment of Significance:

- The current Manual states that pedestrians in certain areas of Manhattan become acclimated to and tolerant of restricted conditions. The current impact thresholds are set at LOS D/E for the Manhattan CBD and downtown Brooklyn and mid-LOS D everywhere else. Perhaps this can be modified to mid-LOS E or LOS E/F for certain parts of the Manhattan CBDs (i.e., between 23rd and 60th Streets and below Canal Street) if we acknowledge that those conditions would remain and most New Yorkers have become acclimated to that level of service. (See page 3P-15.)
- Because corner operations are primarily dictated by the number of pedestrians queuing at a walk signal to cross the street, these service levels correlate with those for crosswalks. Generally, if crosswalk operations are favorable, corner service levels are even more favorable (or superior). Hence, the pedestrian impact analysis could be streamlined to exclude the need for a corner analysis, except under severely congested conditions. The Manual update can require such an analysis if one or both connecting crosswalks are found to operate at LOS E or worse in the Build condition. Since the data needed for corner analyses is largely the same as those used for crosswalk analyses (except for the corner turn volume, which contribute very minimally to the analysis results anyway), this analysis can be amended as appropriate by the crosswalk analysis results.

Chapter 3Q: Air Quality

- Update the methodology and impact criteria sections to include the City’s current guidance for evaluating impacts of PM_{2.5} to address both new emissions from stationary sources as well as ambient conditions when new uses are introduced; update the screening thresholds for vehicle traffic; replace the methods for EPA model ISC3 with the AERMOD model; and incorporate use of Mobile6.2 for estimating PM emissions. (pages 3Q-16)
- Add details on procedures to assess impacts from existing sources for industrial analysis particularly for area-wide rezoning actions. (Page 3Q-16.)



- Add (E) designation language for stationary sources under mitigation. (Page 3Q-43.)
- Evaluate odor analysis methodologies and thresholds that address not just new stationary sources, but current ambient conditions when new uses are introduced and distinguish between aesthetic versus health standards. (Page 3Q-6.)
- Address New York State SEQRA considerations on Greenhouse Gas Emissions.

Chapter 3R: Noise

- Update the models and methodology section to include examples for City area-wide rezoning actions. (See page 3R-12.)
- Update the discussion on methodology and noise models to include CadNaA and other models such as SoundPlan.
- Review and update the required attenuation values of achieving acceptable interior noise levels (i.e., building attenuation). (Pages 3R-18 through 3R-21.)
- Add (E) designation language for stationary sources under mitigation. (Page 3R-21.)

Chapter 3S: Construction

- Consolidate construction analyses from the individual technical guidance chapters into this chapter.
- Provide definitions for determining “long term” and “short term” construction periods or “severity” for short term impacts. (Page 3S-1.)
- Provide guidance on when to perform quantified traffic, transit, pedestrian, noise or air construction period impacts. (Pages 3S-4 through 3S-6.)
- Add procedures for determining stormwater impacts analysis during construction. (Page 3S-2.)
- Update methodology to reflect the current procedures under air quality to include the requirements of Local Law 77 in terms of air emissions. (Page 3S-6.)
- Update methodology to reflect the current procedures under noise to include the requirements of the City’s updated Noise Code (July, 2007) in terms of the need for noise control plans during construction. (Page 3S-6.)
- Update the typical noise levels of construction equipment to reflect latest technology/quieter models. (Move from “Noise” section discussed above, now page 3R-17.)
- Update noise construction analysis for Federal Highway Administration Roadway Construction Noise Model equation for predicting construction noise.



- Address the issue of complex mitigation packages and implementation for large projects.
- Based on the above, provide examples of when mitigation is appropriate. (Page 3S-7.)

Chapter 3T: Public Health

- Provide links to New York City and State Department of Health databases. (Page 3T-1.)
- Provide guidance on assessing impact from surface waters and public health exposure issues and as it relates to any potential significant public health impacts due to dermal exposure, inhalation, etc. (Page 3T-2.)
- Expand on determining impact significance discussion using additional examples. (Page 3T-2.)

Chapter 3U: Alternatives

- Clarify differences between “No Impact” and “No Unmitigated Impact” Alternatives. (Page 3U-2.)
- Add a summary of cross references to “alternatives” as presented in each of the technical areas presented above.

Chapter 3V: Mitigation and Summary Chapters

- Provide a separate mitigation chapter with a summary cross reference to “mitigation measures” as presented in each of the technical areas presented above.
- Address impact avoidance options as a planning and design option rather than mitigation measures under CEQR.
- Expand on mitigation measures implementation techniques (e.g., signal timing, open space, schools, etc).
- Mitigation measures could include a complete funding and implementation plan. Mitigation that relies on the Metropolitan Transit Authority or New York City Transit to provide additional service as demand warrants should be expanded to provide details.

It is worth noting that some in our Chapter have raised questions regarding the approach of developing baseline conditions, the scope of impact, and the evaluation year approach as is traditionally done under CEQR. In some cases, baseline conditions can be so conservative (or extensive) that they can mask the incremental impacts of an individual project. In addition, for site-specific projects, the scope of impact is often limited to the footprint of the project being evaluated. For larger development and redevelopment projects, impacts on the surrounding environment can be significant in future conditions. Thus, there could be consideration of an additional evaluation scenario that examines future (post-build year) impacts and



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additional discussion of cumulative impacts for larger projects. Some were also of the opinion that the City should appoint a separate agency to conduct all City reviews. Such an agency could be funded by project sponsors (public or private) or CEQR fees. A statement of the City's position on Community Benefit Agreements would also be helpful.

Lastly, we would like to recognize that this update provides an important opportunity to advance the City's environmental review process as a vehicle towards more progressive planning (or to set the stage for longer term planning) rather than allowing the process to remain limited to a series of individually, often disconnected, reactive disclosure documents. In this way, the environmental review process would not be perceived (as it is by some) as paperwork impeding development, but could be a contributing planning tool that supports sustainable long-term growth, planning, and policy development in our City while improving the urban environment. As stated above, our Chapter encourages the use of the CEQR process not just as a mechanism for tallying project impacts, but as a potential catalyst in setting the stage for longer term environmental planning here in New York City (e.g., coordinating City-wide wetland mitigation priorities, transit improvements, water quality improvements, noise controls, etc.).

We hope these recommendations are helpful and we thank you for the opportunity to provide you and OEC with our collective professional expertise and input to the 2009 CEQR Technical Manual update process. The CEQR Technical Manual is used by many in our organization, and we look forward to a continued collaboration with you and your office in this process.

Sincerely,

A handwritten signature in black ink that reads "Donald C. Burns".

Donald C. Burns, AICP
President, New York Metro Chapter
American Planning Association

cc: APA Metro Chapter Executive Committee
APA Environmental Committee