

Pursuant to §617.8(e)(7), the DGEIS scoping document shall include a brief description of the prominent issues that were considered in the review of the environmental assessment form or raised during scoping, or both, and determined to be neither relevant nor environmentally significant or that have been adequately addressed in a prior environmental review and the reasons why those issues were not included in the final scope. This Attachment sets forth those issues that were considered but determined by the Lead Agency not to be included in the final scope pursuant to §617.8(e)(7) of the SEQRA regulations.

This Attachment also provides the Lead Agency's response to issues raised during the public scoping process. While not required by SEQRA regulations, the Lead Agency desires to share these responses in the interest of transparency as well as to allow the Lead Agency to further explain its decision-making processes.

The public comment period for the DGEIS Scoping Document opened on February 17, 2022 and closed on March 18, 2022. During that time, a public scoping session was held by the Town Board on March 1, 2022. The Town received more than 500 comments during the DGEIS Scoping comment period.

A. PROMINENT ISSUES NOT INCLUDED IN SCOPE

PHYSICAL IMPACTS TO LAND

The Proposed Action does not include any physical changes, improvements, or alterations at the New Airport or the Affected Airports. While the Affected Airports may receive additional flights with the Proposed Action, those operations would only be accommodated to the extent that the Affected Airports have the capacity to handle that added air traffic. There is no reasonable basis for assuming that an increase in flight activity at one of the Affected Airports as a result of the Prior Permission Required (PPR) at the East Hampton Town Airport would result in a physical expansion at those airports. Finally, there is no plan the Lead Agency is aware of to expand the capacity of the Affected Airports. Similarly, the Proposed Action would not result in any physical impacts to land outside of the Affected Airports. In addition, any ongoing cleanup efforts associated with the Superfund site located at the East Hampton Town Airport would continue in accordance with NYSDEC requirements and would not be affected by the Proposed Action. Therefore, the Proposed Action would not result in adverse impacts to the following environmental categories:

1. Geology, soils, and topography.
2. Construction activities and stormwater.
3. Infrastructure/Utilities.
4. Subsurface hazardous materials.
5. Cultural Resources.

SOCIOECONOMICS, FISCAL IMPACTS, AND COMMUNITY FACILITIES

Based on an analysis of total numbers of visitors to the Town of East Hampton, it is estimated that less than one percent arrive via the EHA.¹ The Proposed Action may impact a percentage of this one percent. EHA accounts for approximately 7.5% of the Town’s total expenditures (\$6 million in 2020) and gross revenues (including, \$2.6 million from fuel sales and \$2.2 million from landing fees in 2020).² An analysis of data collected from passenger surveys indicated that EHA passengers generate between \$13 million and \$19 million in direct visitor spending annually, which represents between two and three percent of the Town’s taxable sales.³ Another evaluation of airport economic impacts estimated a total spending by visitors using the Airport of \$68.3 million annually in the East Hampton and Southampton regions.⁴ Both studies used the same underlying methodology (i.e., IMPLAN software) and a similar number of airport operations. However, the studies differed in the number of passengers assumed per flight, the per person spending amount, and the regions included (East Hampton only compared to East Hampton and Southampton). Previous studies estimated that between 70% and 84% of the passengers no longer able to fly into EHA as a result of potential restrictions would use an alternate means of transportation, such as a different airport, the railroad, bus, or a private automobile and, therefore, their spending would still occur within the Town.^{5,6} Under the scenario of elimination of all commercial flights, the lost spending from travelers who would not use an alternate means of transportation was estimated to be \$3 million to \$4 million.⁷ However, the Proposed Action would not eliminate all commercial flights; therefore, the economic impact from lost spending is expected to be less than that amount. Using the higher estimated visitor spending of \$68.3 million for both East Hampton and Southampton, and assuming complete closure of the airport with as many as 30 percent of travelers not using alternate means of transportation, lost spending would be approximately \$20.5 million. However, given that the Proposed Action does not include closing the Airport, the economic impact to the East Hampton and Southampton area is expected to be less than \$20.5 million. Based on these estimates of economic impact, the Town Board has concluded that the overall impact to the Town of East Hampton’s economy and fiscal status from the proposed operational restrictions, while not zero, is not expected to be significant.

B. COMMENTS RECEIVED ON ISSUES NOT RELATED TO SCOPE

PRIOR PERMISSION REQUIRED FRAMEWORK

Comments received during the scoping process regarding the proposed PPR framework ranged from commenters who felt the restrictions were not stringent enough and the airport should be closed, to those who felt the restrictions were overly burdensome on one or more groups of airport

¹ HR&A Advisors, Inc. 2021. East Hampton Airport Economic Impact Analysis. October 2021.

² 2020 Town of East Hampton Adopted Budget.

³ HR&A 2021.

⁴ EBP US. 2021. Review of the May 2021 *East Hampton Airport Preliminary Economic Impact Analysis* and Comparison to the December 2020 Report, *Contribution of the East Hampton Airport*. June 18, 2021.

⁵ Ibid.

⁶ Audience Research & Analysis. 2021. East Hampton Town Study of Airport Passengers. August 2021.

⁷ HR&A 2021.

users. These comments are about the propriety of the Proposed Action itself, not the way in which the environmental impacts of the Proposed Action are analyzed and, therefore, do not require changes to the DGEIS Scoping Document.

The Lead Agency notes that these comments were considered by the Town Board and changes to the proposed PPR framework were made as a direct result of these comments. See **Attachment A** for a detailed description of the PPR framework that will govern the Study Period.

POTENTIAL IMPACTS OF CLOSURE/ REOPENING OF AIRPORT

Comments were received regarding the feasibility of closing the East Hampton Airport and opening the East Hampton Town Airport as a private airport. These issues were addressed in previous environmental reviews. The Lead Agency also notes that as of the adoption of the DGEIS Scope, the FAA has completed its “airport airspace analysis” and issued a finding of “no objection” to the Town’s plan to deactivate the existing public-use airport at 11:59 p.m. on May 17, 2022 and activate a new, private-use airport at 9 a.m. on May 19, 2022.

Comments were received suggesting that the previously completed environmental review of the East Hampton Airport deactivation and opening of the New Airport was, with respect to its SEQRA review, improperly segmented from the SEQRA review of the Proposed Action. The Town believes such prior actions fall within the ambit of permissible segmentation and as contemplated, the DGEIS will evaluate the impacts of the Proposed Action, as discussed in the DGEIS Scope, rendering this concern moot.

C. COMMENTS ON THE DGEIS SCOPE

Public comments were received regarding the environmental categories proposed to be analyzed in the DGEIS Scope, as well as the methodologies proposed to analyze the potential environmental impacts of the Proposed Action. The issues raised by these comments are provided below, together with the Lead Agency’s response in *italics*.

Commenters suggested that the proposed scope of the DGEIS was too narrow and should evaluate a wider group of affected people, as well as wildlife and the environment. One commenter stated that “the effects of the Proposed Action will impact everyone and everything in the flight path of the diverted aircraft, and in the flight path of any additional flights that are created by this change, as well as everyone and everything along the paths of redirected or increased road traffic.”

The DGEIS Scope requires analysis of those potential environmental impacts that the Lead Agency has determined may be significant. Specific suggestions from the public on ways in which the Scope could be “expanded” were received and addressed by the Lead Agency.

As stated in the SEQRA Handbook (2020), “EISs should be analytical, concise, and not encyclopedic...EISs should not contain more detail than is necessary to address the nature and magnitude of the proposed action and the significance of its potential impacts.”

Comments were received stating that an analysis of impacts of the proposed environmental-based restriction are not included in the Scope.

Specific discussion of this component of the Proposed Action was added to the DGEIS Scope.

East Hampton Town Airport Operational Changes

One commenter, in questioning the Town's claims that the proposed PPR would affect 40% of flight operations, claimed that their analysis showed it would only affect 23.5% of flight operations. The commenter also suggested that 2/3 of operations affected by a curfew would reschedule and would not be eliminated. Other commenters suggested that operations originally intended for the East Hampton Town Airport might make more than one trip at another airport due to lack of parking and other facilities.

Comment noted. The purpose of the DGEIS is to determine the potential impacts of the PPR.

One commenter, quoting from the Garvett 2021 study, stated that Sag Harbor (seaplanes) and Mattituck would also receive diverted aircraft. Another commenter also suggested that Brookhaven Calabro airport be added to list of Affected Airports.

The Lead Agency does not believe that it is reasonable that Mattituck or Brookhaven would receive diverted flights as a result of the Proposed Action and, therefore, they should not be analyzed within the DGEIS. The reasons for this opinion are stated in the diversion studies prepared for the Town in 2021.

With respect to Sag Harbor (seaplanes), what is discussed as a potential by the commenter is that seaplanes, which can land in most navigable waters where not otherwise prohibited by local ordinance, may choose to land in such waters and provide an alternative means of air transportation. The Lead Agency believes that the number of such potential diverted flights is minimal and, given the intervening logistical challenges in completing a journey to East Hampton from a plane landing off Sag Harbor's shore (e.g., water taxi/launch, etc.), this option may appeal to only a small number of travelers.

Nevertheless, the Lead Agency has modified the Scope to require an analysis of the potential for diverted trips via seaplane to Sag Harbor Bay to determine if these trips would result in any significant adverse impacts.

Commenters suggested that it was improper to assume no physical or other changes to Affected Airports to accommodate increased demand.

See discussion in Section A, above.

Some commenters stated that people in the western portions of Long Island, NYC, and/or northern NJ are also negatively impacted by air traffic headed to EHA.

No basis was provided for an opinion that the Proposed Action would have adverse impacts on those communities. Therefore, the Scope was not modified based on these comments.

One commenter suggested increasing train and ferry infrastructure as a way to reduce airport noise.

A requirement to address these measures in the "Mitigation" chapter was added to the DGEIS Scope.

A commenter opined that the diverted air traffic to Montauk Airport and the resulting increase in ground traffic in Montauk would lead to the Town taking over private property to widen East Lake Drive. Another commenter suggested several measures to potentially mitigate adverse traffic impacts from diverted flights to and from Montauk, including speed limit reductions, parking restrictions, restrictions on idling/waiting at airport, and no expansion of parking lot/terminals.

Attachment C: Prominent Issues Not Included in Scope

The Town is not contemplating taking private property to widen East Lake Drive and is not considering such widening as a potential mitigation measure. The DGEIS Scope was updated to clarify that mitigation measures will be identified that could potentially mitigate significant adverse traffic impacts. Such measures may include roadway improvement and transit improvement mitigation measures as well as traffic mitigation measures for vehicular, pedestrian and bicycle safety.

Some commenters suggested evaluating impacts to plane and/or auto accidents. One commenter expressed concern with traffic safety because his driveway on East Lake Drive has a limited sight distance curve. Some commenters suggested evaluating impacts to emergency responders due to increased ground traffic.

The Lead Agency is not aware of any basis, nor was one given, for the belief that changes in flight patterns at the New Airport and the Affected Airports would adversely affect airplane safety. Vehicular safety and impacts to emergency responders on given roadways as a result of the Proposed Action will be examined in the Traffic Impact Analysis, and a specific mention of these considerations was added to the DGEIS Scope.

Commenters suggested that the DGEIS should evaluate the economic viability of the airport under the PPR restrictions.

The New Airport will have different landing fees (when compared to the landing fees in effect at EHA), which are aimed at keeping the New Airport economically viable. For example, under the proposed fee structure for the New Airport most landing fees were increased approximately 100 percent from those at EHA. Moreover, the most regular commercial operator, the small helicopter, had an approximately five-times increase in proposed landing fee. Locally based operators were also historically exempt from paying landing fees, but are anticipated to pay a landing fee in the future. The New Airport also benefits from an “airport fund,” which is separate from the Town’s “general fund.” The Airport Fund has sufficient funds to absorb a loss in the 2022 season—although that hopefully does not occur—while the Town Board studies the impact, if any, of its proposed restrictions vis-à-vis fuel sales and landing fees. Therefore, an analysis assuming that the Proposed Action would adversely affect the ongoing economic viability of the New Airport was not included in the DGEIS Scope.

Comments were received suggesting that the DGEIS consider the economic impacts to communities receiving diverted flights.

As the economic impact to the Town of East Hampton from the Proposed Action is not anticipated to be significant (as described above), it is similarly expected that the economic impacts to the communities surrounding the Affected Airports, which would necessarily be dispersed and smaller than those at EHA, would not be significant. Further, any potential economic impact to those communities would be anticipated to be positive. Therefore, this analysis is not included in the DGEIS Scope.

Comments were received suggesting that the economic impact to the Town of East Hampton, and surrounding area, of the Proposed Action could be significant.

East Hampton Town Airport Operational Changes

The Lead Agency has reviewed these comments, as well as the economic analyses performed by some of the commenters. As a result, the Town has updated the reasons supporting its determination that the potential economic impacts to the Town of East Hampton and surrounding area would not be significant. See Section A, above.

Comments were received stating that an environmental justice analysis should be performed, as well as an analysis of potential impacts to the Shinnecock Indian Nation.

With the exception of the Shinnecock Indian Nation, the commenters did not identify a potential environmental justice area that they believed may receive an additional environmental burden as a result of the Proposed Action. One commenter opined that the previous voluntary routes that routed helicopters over Noyac was an environmental justice issue. Therefore, the DGEIS Scope has been amended to include an analysis of the potential environmental justice impacts of the Proposed Action.

Some commenters stated that there is a buildup of black soot on their vehicles and houses due to airport operations. Some commenters suggested that impacts to odors from fuel emissions should be evaluated. Others stated that impacts as a result of lead emissions should be analyzed around the Airport.

The DGEIS Scope has been amended to include an enhanced discussion of emissions from aircraft operations including lead, airborne particulate matter and odors.

Comments were received suggesting that the DGEIS should evaluate potential impacts to groundwater, noting the current groundwater contamination at EHA. Some commenters opined that operation of the New Airport could delay, impede, or restrict cleanup operations associated with the Superfund site at the airport. Other commenters opined that the Proposed Action would result in increased pollution deposition at the Affected Airports, such as fuel and oil spills on runways.

The Lead Agency is not aware of any basis, nor was one provided, to believe that the Proposed Action, which includes no ground disturbance to the New Airport or Affected Airports, would in any way affect or impede the remediation of existing contamination at EHA. Therefore, an analysis of this impact was not included in the DGEIS. Similarly, no basis was given for assuming that the Proposed Action may result in an increase in “spills” at the Affected Airports. The Lead Agency also notes that neither Montauk Airport nor the Southampton Heliport have fueling facilities.

Commenters opined that a substantial increase in air traffic could have adverse impacts on wildlife near the airport, or, as one commenter suggested, “wherever such wildlife is located,” including along flight paths. One commenter suggested that impacts on vegetation cover and plant and animal species, particularly those that are threatened, endangered, or rare, on airport land should be evaluated.

While an analysis of potential noise-related impacts to wildlife was included in the draft DGEIS Scope, the Lead Agency has added a “Natural Resources” chapter to the DGEIS to discuss this, and other, potential impacts to wildlife as a result of the Proposed Action. The scope of this analysis is necessarily limited to those areas in which there is a potential for a substantial increase in flight operations to occur as a result of the Proposed Action.

Attachment C: Prominent Issues Not Included in Scope

Critical Environmental Areas and locations of rare, threatened, or endangered species in these potentially affected areas will be identified.

Some commenters suggested evaluating impacts to human health from noise, carbon emissions, and/or lead.

The DGEIS Scope was amended to require that the potential human health impacts resulting from changes in noise levels or air quality as a result of the Proposed Action be analyzed if warranted.

Some commenters suggested that impacts from new alternative uses of the airport site be evaluated including utility scale solar, agriculture, parkland, and affordable housing. One commenter opined that the private airport may not be able to open and suggested that impacts to flora, fauna, and the aquifer be evaluated under an alternative involving redevelopment of the site. One commenter suggested that repurposing of the airport property should evaluate impacts to the Priority Groundwater Protection Area, the designation as a Critical Environmental Area, open space, wildlife, and groundwater recharge.

As noted above, the FAA has completed its “airport airspace analysis” and issued a finding of “no objection” to the Town’s plan to deactivate the existing public-use airport at 11:59 p.m. on May 17, 2022 and activate a new, private-use airport at 9 a.m. on May 19, 2022. The Town has no plans to close and redevelop the Airport; such an alternative would not meet the Purpose and Need of the Town. As such, studying redevelopment is not required by SEQRA. Furthermore, since there are no plans to redevelop the airport, there is no redevelopment scenario that could be studied. SEQRA does not require the analysis of purely speculative redevelopment scenarios that do not meet the Purpose and Need of the Applicant/ sponsor and are not being considered.

Comments were received requesting that the Town consider acquiring Montauk Airport and implementing the same/ similar PPR framework at that airport as a way to minimize and mitigate potential impacts in and around the Montauk Airport.

While making no determinations as to the feasibility or practicability of doing so, the Town believes that it is a reasonable alternative to consider this option in the DGEIS. Therefore, the DGEIS Scope was updated to reflect the addition of this alternative.

One commenter suggested that vibrations caused by helicopters could damage the coastal bluffs and lead to erosion. Other commenters stated that vibrations from low-altitude flights affect their homes.

Potential impacts from low frequency, c-weighted, noise was added to the DGEIS Scope. Low frequency noise can be perceived as vibration.

One commenter suggested, with no reason therefor, that light pollution be considered in the DGEIS.

The Proposed Action would not result in any effects on lighting and does not contemplate the construction of any new facilities at the New Airport or the Affected Airports. Therefore, this analysis will not be included in the DGEIS.

East Hampton Town Airport Operational Changes

Some commenters suggested that the DGEIS include a comprehensive review of the existing airport, which would then serve as the baseline for evaluating impacts from implementation of the PPR framework. Some commenters further suggested that this “full evaluation” is required since the East Hampton Airport was constructed prior to SEQRA. One commenter suggested that the airport remain closed until a full SEQRA review has been completed.

SEQRA requires the evaluation of the potential environmental impacts of discretionary actions. Evaluating ongoing operations, or the “status quo,” is not required. While SEQRA requires an analysis of not implementing the Proposed Action, this analysis is undertaken to inform the Lead Agency and the public of the potential increments in environmental conditions between No Action and the Proposed Action as the basis for determining impacts. Therefore, the DGEIS Scope was not updated based on these comments.

Commenters suggested that the Scoping Document lacked sufficient detail in the description of the Proposed Action. Commenters further suggested that the Scoping Document should include an initial identification of mitigation measures.

*While the Lead Agency believes that the description of the Proposed Action, and the components thereof, in the draft DGEIS Scope were sufficient for the purposes of developing a scope of work to assess potential environmental impacts, additional details on the Proposed Action have been included in the final DGEIS. See **Attachment A**. The Lead Agency has added a “Mitigation Measures” chapter to the DGEIS.*

One commenter suggested that the Scoping Document lacked sufficient detail regarding identification of existing relevant information, required new information, and methodologies for obtaining new information.

*Additional information with respect to the process for collecting and analyzing information required to evaluate the potential significant adverse impacts of the Proposed Action has been added to the final DGEIS Scope, including that information found in **Attachment B**.*

Some commenters opined that the PPR restrictions need to be more restrictive/comprehensive in order to yield useful information to analyze the impacts of flight restrictions at the New Airport. One commenter suggested that closing the airport for at least a month during the peak season is the only way to obtain accurate diversion data. One commenter suggested that the 2022 summer season may not accurately reflect long-term changes that would occur after changes in business operations and may instead only represent interim changes. One commenter stated that a one-year study would not be representative because operators would purposefully look to increase impacts to Affected Airports to skew the study. Another commenter suggested that the changes in capacity at other airports, or changes to ground transportation around those airports, may occur several years after implementation of these rules as airports and operators adapt. This uncertainty, the commenter opined, should be captured in the DGEIS.

Additional information on why the Lead Agency chose the entire 2022 summer season as the Study Period has been added to the final DGEIS Scope.

One commenter questioned whether another Environmental Impact Statement would be needed if more restrictive measures are proposed in the future.

Attachment C: Prominent Issues Not Included in Scope

In response to this comment, the DGEIS Scope has been amended to require, under Chapter 10 "SEORA Required Analyses," a discussion of whether, and to what extent, future changes in airport flight restrictions would require environmental analysis given the findings in the DGEIS.

Commenters suggested that the Scoping Document should identify the geographic extent of the community or land uses surrounding the Affected Airports that should be studied. One commenter suggested that the Scoping Document should identify the affected area to be evaluated for community character, should list the community character characteristics that will be analyzed, and should indicate that these will be compared against the Closure alternative.

In response to this comment, the DGEIS Scope has been amended to clarify the area of analysis for land use and community character. Additional information about the definition of community character has also been added to the final DGEIS Scope.

One commenter stated that the scope does not define "future" in the context of the "Future without the Proposed Action" condition in the land use chapter and is not clear on how or what would be discussed in that condition.

The Future Without the Proposed Action condition will be considered 2023 for the purposes of the DGEIS analyses. This was clarified in the final DGEIS Scope.

One commenter suggested that the traffic section of the Scoping Document should indicate that a full Traffic Impact Study would be conducted to evaluate existing traffic around the airport (including the proposed Wainscott commercial center). One commenter suggested considering the cumulative impacts of the Proposed Action with the pending redevelopments along the East Lake Drive corridor. One commenter suggested that the Scoping Document include maps showing the intersections to be studied and a reference to the 2015 review of proposed restrictions at the airport. One commenter suggested that vehicular traffic evaluation not be limited to peak hours, based on the potential for a greater proportional impact to traffic during non-peak times.

Information regarding specific "no build" projects was added to the DGEIS, as were maps of the intersections that will be analyzed in the DGEIS. An additional "off-peak" hour was added to the "peak" hours, "weekend," and "holiday" hours of analysis.

One commenter suggested that additional back street intersections in Montauk should be included in the ground traffic analysis.

It is the opinion of the Lead Agency, based on the recommendation of their traffic consultant, that the intersections chosen for analysis provide an adequate representation of intersections that have the potential to experience traffic capacity deficiencies as a result of increased ground traffic from the Proposed Action.

Commenters suggested that an explanation should be provided for having selected 50 dBA for evaluation of noise impacts. One commenter suggested that use of the federal standard of 65 dBA be considered. Commenters suggested that the extent of exposure time for any thresholds selected should be evaluated.

This discussion was added to the final DGEIS Scope.

East Hampton Town Airport Operational Changes

Commenters suggested that noise from increased vehicle traffic and ambient noise unrelated to airport operations should be considered. One commenter further suggested that increased noise not just at intersections but also along roadways should be considered.

Vehicular traffic noise is already addressed in the scope and would be analyzed “at representative sensitive locations along roadways where the Proposed Action may substantially increase traffic noise.”

One commenter opined that the noise impact is not just when the plane is in the air but begins the moment the engine is started.

In response to this comment, the final DGEIS Scope includes an analysis of ground-level aircraft noise.

One commenter suggested that metrics for evaluation of noise complaints should be identified. Some commenters opined that the noise complaint data are driven by a small number of vocal residents. Commenters opined that noise complaints are an inaccurate way to analyze effects of operation due to complaint fatigue, unfamiliarity with how to file a complaint, inconvenience of taking the time to file a complaint, and/or pilots who conceal their tail numbers or turn off their transponder. One commenter suggested that a number of noise complaints were not included in prior analyses. One commenter opined that the raw complaint data provided to HMMH in the past had no further validation of the complaints and suggested that there are a number of deficiencies with the dataset such as user-selected airport designation, lack of geo-trackable location, and submission of duplicate complaints.

*The Final DGEIS Scope, including **Attachment B**, includes additional detail with respect to obtaining noise complaint data, the limitations of gathering noise complaint data for purposes of impact analysis, and the way in which the DGEIS may consider noise complaint data relative to the potential impacts of the Proposed Action.*

One commenter suggested that defining the regional emissions analysis in terms of changes within Suffolk County is an inappropriate metric because the airports receiving the diverted flights are also in Suffolk County. Commenters suggested that changes in locations of emissions within the County should be evaluated.

In response to this comment, the DGEIS Scope was amended to include an analysis of localized emissions from aircraft operations at the Affected Airports.

Commenters stated that the air quality data proposed for use in the No Action condition is from monitoring sites at least 40 miles away and is, therefore, not representative of the air quality proximate to the New Airport and the Affected Airports.

The NYSDEC monitors referenced in the DGEIS Scope represent the closest air quality monitoring stations to the study area using EPA monitoring methodologies. The monitored concentrations are used for EPA’s determination of attainment status. The monitored concentrations are anticipated to be higher than background concentrations (excluding the emissions associated with the airports under analysis) and are, therefore, conservatively used for this analysis. The predicted modeled concentrations will be combined with background concentrations for comparison to the appropriate thresholds.

Attachment C: Prominent Issues Not Included in Scope

Commenters suggested that the Scoping Document should clearly state what the federal de minimis threshold is. Commenters suggested that the Scoping Document should identify a threshold for determining if there is a potential for air quality impacts under the mobile source analysis. A commenter stated that a prior 2010 GEIS for EHA used an FAA screening threshold of 180,000 landing/take-offs, but that is too high a threshold for significance.

In response to this comment, additional information on these thresholds and the criteria for determining significance has been added to the final DGEIS Scope.

One commenter opined that the proposed ban on touch-and-go operations would lead to a prolonged period of emissions impacts due to the need to make a full stop and additional taxiing time. Another commenter suggested that the DGEIS evaluate impacts from loss of all private piston planes, as they will not be able to demonstrate compliance with the noise-based standard.

The Lead Agency modified the proposed PPR subsequent to the issuance of the draft scope to allow the Airport Director to permit touch-and-go operations in its discretion. The proposed PPR has also been clarified to make it clear that piston aircraft will be largely unaffected by the PPR. Therefore, the potential impact of these restrictions is anticipated to be minimal and will not be separately analyzed in the DGEIS.

Commenters suggested that the DGEIS should include a separate analysis of greenhouse gas emissions under the current, proposed, and alternative scenarios and that data from the Town's Climate Action Plan, which did not include airport emissions, should not be used as a baseline. One commenter suggested including information regarding how impacts to the Town's climate goals will be evaluated.

The DGEIS Scope requires an analysis of greenhouse gas emissions and changes thereto resulting from the Proposed Action. The magnitude of these impacts will be discussed in the DGEIS with reference to applicable public policy documents.

One commenter stated that hazardous air pollutants (HAPs) should be evaluated with respect to potential increases in airborne lead at and around the Affected Airports.

In response to this comment, an analysis of HAPs has been added to the final DGEIS Scope.

Commenters suggested that the Scoping Document lacked sufficient detail in the description of the alternatives to be evaluated; one commenter also suggested that further detail should be provided describing how the alternatives would be assessed. Another commenter suggested that the Town explain how each alternative will be studied independently and identify how the success or failure of each alternative will be measured. One commenter suggested that all alternatives should be evaluated quantitatively for all impacts studied and for any impacts that are uncertain, a range should be provided.

The DGEIS Scope includes additional information about alternatives, as well as the extent of analyses required for those alternatives.

One commenter suggested the Proposed Action should be compared against the closure of the New Airport to capture the full range of impacts. Another commenter stated that the ever-increasing usage at EHA be projected out to the future and that the impacts of that increase on noise, groundwater, etc, be the baseline, not the status quo.

East Hampton Town Airport Operational Changes

The DGEIS Scope requires an analysis of several future scenarios, including closure of the airport and continued operation of the airport under the flight restrictions that were in place in 2021.