

A. INTRODUCTION

The Town of East Hampton, New York (the “Town”) is proposing to implement long-term operational policies that would limit allowable flight operations at the new Town-owned East Hampton Town Airport (the “New Airport”) for the purposes of reducing noise and other environmental impacts. Adoption of the operational policies is referred to as the “Proposed Action.” Throughout this document, the new, private use airport is referred to as the “New Airport” and the current airport is referred to as the East Hampton Airport (“EHA”). The Proposed Action does not involve construction or physical changes to the airport infrastructure currently on-site.

Pursuant to the rules and regulations of the New York State Environmental Quality Review Act (“SEQRA,” Article 8 of the Environmental Conservation Law and its implementing regulations at 6 NYCRR 617), the East Hampton Town Board (the “Town Board”), acting as Lead Agency, by resolution on February 17, 2022, determined that the Proposed Action has the potential to result in one or more significant adverse environmental impacts and a Generic Environmental Impact Statement (“GEIS”) shall be prepared. This Scoping Document was prepared as an initial step in that environmental review process to guide the preparation of the Draft GEIS (“DGEIS”), as well as to describe the Proposed Action, the approvals required for implementation of the Proposed Action, and the proposed scope of analysis to determine the potential environmental impacts of the Proposed Action.

As required by SEQRA, and in order to allow the public sufficient opportunity to comment on this DGEIS Scoping Document, the Town Board accepted comments on a draft DGEIS Scoping Document between February 17, 2022 and March 18, 2022. A public scoping session, for the purposes of receiving oral comments, was held by the Town Board on March 1, 2022 during the regularly scheduled Town Board work session and was held virtually in accordance with State Law.

B. DESCRIPTION OF PROPOSED ACTION

The Town is proposing to implement long-term operational policies that would regulate flight operations at the New Airport with the objective of reducing noise and other environmental impacts. A more detailed description of the Proposed Action is provided as **Attachment A**. In general, the long-term operational policies being considered by the Town include the following:

- Time-based permissions (e.g., curfew)
- Size-based permissions (e.g., elimination of aircraft that exceed a certain maximum takeoff weight)

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- Noise-based permissions (e.g., aircraft with a noise signature above a defined threshold are permitted to operate one daily roundtrip, with certain aircraft such as piston aircraft on a pre-approved list)
- Operator-based permissions (e.g., commercial operators and fractional ownership operators are permitted to operate at most one daily roundtrip per aircraft)
- Environmental-based reduction such as the eventual reduction or elimination of lead-based fuel sales¹

Given the above, it is anticipated that certain flight operations that would otherwise have utilized the New Airport in the absence of the Proposed Action may, with the Proposed Action, instead use alternative locations (see Figure 1).

AIRPORT HISTORY

The Town of East Hampton owns and operates EHA. EHA, comprising approximately 610 acres, is located in the Wainscott section of the Town, just east of the Town of Southampton (see **Figure 1**). Approximately 56 acres of EHA are within the East Hampton Industrial Park, which is located to the south. North and east of the aviation infrastructure are wooded areas within the boundaries of EHA, including an area used by the Maidstone Gun Club. Surrounding the airport are commercial and industrial uses, as well as residential and recreational uses.

EHA was constructed in 1936. EHA has two active runways, a terminal and various general aviation facilities, airport parking areas, fuel storage and sales, and a seasonally used control tower (see **Figure 2**). The primary runway (10/28) is 4,255 feet long, handles the majority of the traffic, and is suitable for use by jet aircraft. This runway provides more navigational aids and equipment to pilots, such as an FAA-approved instrument approach procedure, which enables pilots to land in inclement weather. The secondary runway (16/34) is a shorter, 2,223-foot-long crosswind runway and is used by small piston engine aircraft; its shorter length limits use by jet aircraft.

EHA has adapted over the decades to industry modernization and newer generations of aircraft and currently serves an increased number of commercial/jet and helicopter flights. The terminal building was constructed in 1994 and includes a car rental desk and other amenities. In addition, an adjacent aircraft parking apron was constructed at the same time, which provides parking for approximately five transient aircraft. In 2005, EHA acquired a state-of-the-art flight tracking system and a seasonal control tower was added in 2013.

The Town last took a federal monetary Airport Improvement Plan (AIP) grant for EHA in 2001. Generally, AIP grant assurances contractually obligate an airport sponsor, like the Town, to comply with certain federal requirements for 20 years from the date of the grant. In 2003, an unincorporated association of Town residents living near EHA sued the FAA challenging the legality of 2001 grant, arguing that the 2001 grant violated federal law because the Town lacked

¹ While the Town is not proposing to immediately restrict or eliminate lead-based fuel sales or the operation of aircraft that utilize lead-based fuels, it is a policy change that is being considered by the Town for potential implementation in the future. Therefore, the DGEIS shall consider the potential environmental impacts of this policy in the relevant sections listed in Section E of this Scope. This analysis shall include a qualitative discussion of the differences in potential impacts that may occur based on the timing of implementing of the policy.

a valid Airport Layout Plan. The litigation concluded in an April 29, 2005, Settlement Agreement, wherein the FAA stipulated that it would not enforce Grant Assurance 22(a)—which provides for nondiscriminatory access to the Airport on reasonable terms—past December 31, 2014. The Town remained obligated for all other grant assurances for the full 20-year period.

In 2015, after completing several studies and engaging in a thorough public process, the Town enacted three local laws to address noise and operational issues at EHA. The first law created curfews for all operators; the second law created an extended curfew for “noisy” operators; and the third law restricted “noisy” operators to one roundtrip per week. A group of airport users challenged the local laws and ultimately the laws were found to be invalid by the U.S. Court of Appeals for the Second Circuit. The FAA was not party to the litigation. The Court’s decision largely turned on EHA being a “public airport” and made clear that the Town could not implement meaningful local control over EHA until it changed EHA’s status to something other than a “public airport.”

Land uses surrounding EHA are comprised primarily of recreation and protected open space to the north, east, and west and mixed low and medium density residential, commercial, and industrial to the south. EHA is in the Georgica Pond Watershed. The airport vegetation cover consists of Atlantic Plains Coastal Grasslands surrounded by pine barrens, both of which are unique ecosystems that support numerous protected plant and animal species. The EHA property is designated by Suffolk County as a Pine Barrens area due to its unique natural community and importance to groundwater recharge.

The Town of East Hampton, including EHA, is within the federally designated Nassau-Suffolk Sole Source Aquifer. EHA is also located within the State designated South Fork Special Groundwater Protection Area (“SGPA”). The northern and eastern portions of EHA are also within a Town-mapped Priority Groundwater Protection Area. The EHA property (with the exclusion of the industrial park) is within the Town of East Hampton’s Water Recharge Overlay District (“WROD”). The airport property is designated a Critical Environmental Area due to the SGPA and WROD designations. EHA is also over the deepest part of the Town’s drinking water reserves and there is a Suffolk County Water Authority well field in the immediate vicinity of the airport. The EHA property contains 47 acres subject to Superfund restrictions due to groundwater contamination from firefighting activities.

PURPOSE AND NEED

Increased air traffic at EHA for decades led to growing concerns in the community about noise, public health, safety, environmental and climate change impacts. These impacts are not well-aligned with Town’s identity as a resort community and its commitment to being environmentally conscious and otherwise sustaining the quality of life and the quiet enjoyment of its rich natural, cultural, and scenic resources. EHA also provides positive values to the community including employment, economic and recreation opportunities as well as access for emergency, medical and civilian services.

In 2021, the Town conducted a year-long public engagement process to examine the airport and discuss the five options suggested by the FAA for future airport operations. The “Re-envisioning” process included presentations to the community, listening sessions, workshops with breakout groups and other outreach to various stakeholders to identify the range of opinions and positions regarding the future of the airport. These opinions ranged from support to close the airport at one end of the spectrum, to those that did not want to see any changes to airport operations. During

the re-envisioning process, more than 1,000 people submitted email, letter, or oral comments regarding the airport's future.

C. POTENTIAL ENVIRONMENTAL IMPACTS

A SEQRA Positive Determination of Significance adopted by the Town Board identified the following potential significant adverse environmental impacts that could result from the Proposed Action. This determination was based on a Full Environmental Assessment Form (FEAF) prepared by the Town and dated February 17, 2022.

- Increased noise from aircraft as well as from changes in vehicular traffic patterns and roadway volumes in the areas surrounding the airport facilities proximate to the New Airport that may experience an increase in certain types of flights as a result of the Proposed Action (referred to as the “Affected Airports”).
- Changes in the number, type, time, and frequency of flight operations at the New Airport and the Affected Airports, as well as changes in vehicular traffic patterns and roadway volumes.
- Changes in the community character surrounding the New Airport and the Affected Airports as a result of changes in flight operations, vehicular traffic, and noise.

D. REQUIRED ELEMENTS OF THE DGEIS

The DGEIS will provide an analysis of the potential environmental impacts of the Proposed Action for the subject areas outlined below. It will be the objective of these analyses to identify significant adverse environmental effects, the measures that may be necessary to mitigate those significant adverse impacts, and the impacts that cannot be avoided if the Proposed Action is implemented. Information for each of the subject areas will be provided in individual chapters describing the conditions in the future without the Proposed Action (the “No Action Condition”), potential impacts of the Proposed Action, and, where feasible, the mitigation measures for significant adverse impacts identified. Given the limitations of previously conducted desktop analyses in estimating the impacts to Affected Airports and the New Airport as a result of flight restrictions at the New Airport, this DGEIS shall, where possible, be based on data from a real-world study of restrictions similar to the Proposed Action. That is, in order to more accurately determine the potential impacts of the Proposed Action, this DGEIS assumes that that Town would implement a prior permission required framework for the New Airport, similar to the Proposed Action, to allow real-world measurement of the impacts thereof. At the conclusion of this study, the DGEIS would present the findings of the analysis.

Each chapter will include a brief introduction identifying the major topics to be considered, relevant methodology used, and thresholds for determining if significant adverse impacts exist. An Executive Summary describing the Proposed Action, significant adverse impacts, and mitigation measures identified shall also be included.

E. ORGANIZATION AND EXPECTED CONTENT OF THE DGEIS

COVER SHEET AND GENERAL INFORMATION

The Cover Sheet will identify: the Proposed Action; its location; the name, address, and phone number of the Lead Agency; the name and address of the DGEIS Preparer; the document as a Draft Generic Environmental Impact Statement; the Date of Acceptance of the DGEIS by the Lead

Agency; and, the date of the Public Hearing and the period established for submitting written comments to the Lead Agency and where they can be submitted.

Additional information, to be provided on pages following the Cover Sheet, shall include the name(s) and address(es) of the consultants involved in the preparation of the DGEIS and their respective roles. The DGEIS will also identify the Involved and Interested Agencies² to which copies of the DGEIS and supporting material will be distributed.

A Table of Contents followed by a List of Tables and List of Figures shall be provided.

EXECUTIVE SUMMARY

- Introduction
- Description of the Proposed Action
- List of approvals required
- List of Interested and Involved Agencies
- Statement of Purpose and Need for the Proposed Action
- Summary of potential significant adverse environmental impacts identified in each subject area
- Summary of mitigation measures proposed for potential significant adverse environmental impacts
- Description of alternatives analyzed

CHAPTER 1: PROPOSED ACTION DESCRIPTION

A. Introduction

1. Identify the document as the Draft Generic Environmental Impact Statement for the Proposed Action and describe the primary programmatic elements of the Proposed Action. Based on the studies performed, summarize the changes in aircraft operations at the New Airport and the Affected Airports resulting from the Proposed Action.

B. Proposed Action

1. Location and Setting
 - a. Describe in text and graphics the physical boundaries and various land uses within and around the New Airport.
 - b. Based on available data, describe the No Action flight operations at the New Airport (e.g., past five years, to account for pre-pandemic conditions), including the types of aircraft, times of aircraft operation, frequency of operations, and generalized off-site routing of operations (e.g., flight paths) with a description of seasonal variations in usage. This baseline will be considered the “No Action” condition. See **Attachment B** for a more detailed description of the data proposed to be collected for this purpose.

² The Town Board is the only Involved Agency, as defined by SEQRA, as it is the only agency with approval authority over the Proposed Action.

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- c. Summarize in text and graphics the environmental setting of the New Airport as compiled and presented in the recently completed *East Hampton Airport Re-Envisioning* study process.
- d. Locate and describe airport facilities that are proximate to the New Airport and may experience an increase in certain types of flights as a result of the Proposed Action. These airports are referred to as the “Affected Airports.” The description should include a summary of airport infrastructure and No Action flight operations for the Affected Airports.

2. Description of Proposed Action

Describe the changes in long-term operational policies that the Town proposes to implement related to allowable flight operations at the New Airport.

3. Impacts to Flight Operations

This section shall describe and quantify the change to flight operations at the New Airport and the Affected Airports as a result of the Proposed Action.

a. Previous Desktop Diversion Studies

A number of airport diversion studies previously estimated the impacts of closing the New Airport or restricting traffic at the New Airport. This section shall summarize these various studies, which shall be included in full in an appendix to the DGEIS.

1. *Potential Traffic Diversion from Proposed Restrictions at HTO*, by Peter Stumpp. April 2015.
2. *East Hampton Town: Study of Airport Passengers*, by Audience Research & Analysis. August 2021.
3. *Feasibility Study for the Diversion of Airport Operations at East Hampton Airport*, by HMMH. September 2021.
4. *East Hampton Airport Diversion Study*, by Garvett & Associates, LLC. September 2021.

b. Changes to Flight Operations

This section shall describe in text, tables, and graphics, the observed flight operations at the New Airport and the Affected Airports during a period when operational policies that restrict certain aircraft operations at the New Airport, similar to those included in the Proposed Action, are in effect (the “Study Period”). See **Attachment B** for a detailed description of the data proposed to be obtained regarding flight operations at the New Airport and Affected Airports. The actual, observed flight operations at the New Airport and the Affected Airports shall be compared to the recent historical flight operations at EHA and the Affected Airports, as described above, to estimate the impacts of the Proposed Action on flight operations.

Given that the vast majority of flights to and from EHA are during the summer season, defined for purposes of this analysis as that period from approximately May 1 to September 30, the Study Period should include as much of this period as is possible. The duration of the Study Period is anticipated to be long enough to avoid the potential for travelers to reschedule their travel plans to avoid potential restrictions, while short enough to not commit the Town Board to a particular course of action. For example, if the Study Period were only a few weeks, or even a month during the summer season, the Lead Agency believes that some segment of airport travelers would adjust their

travel plans to outside of the Study Period to avoid potential inconvenience. If, however, the Study Period is as proposed, the potential for such shifts in travel patterns is greatly reduced. Therefore, it is the Lead Agency's objective to encompass as much of the summer season as possible. It is noted that some commenters on the DGEIS Scope believed that a one-summer period would not be long enough to measure long-term changes in travel pattern behavior under the Proposed Action. While the Lead Agency agrees that there may be some changes in behavior several years after implementation of flight restrictions at the New Airport, it is the Lead Agency's conclusion that a single season is long enough to observe the vast majority of changes in behavior. As such, it is the Lead Agency's opinion that potential minor changes in behavior several years removed from implementation would be unlikely to materially affect the findings of the DGEIS with respect to the potential environmental impacts of the Proposed Action; this will be discussed in Chapter 10 of the DGEIS.

c. Potential for Seaplane Diversion to Sag Harbor Bay

Based on the desktop studies previously performed, it is the Lead Agency's opinion that the vast majority of flights that would be diverted from EHA as a result of the Proposed Action would divert to the Affected Airports. Nevertheless, the Lead Agency, in response to public comment, will evaluate the potential for diverted seaplane flights operating within Sag Harbor Bay to determine if such trips may result in a significant adverse environmental impact.

The first step in this analysis will be to estimate the number of seaplane landings that appear to have been diverted from the New Airport during the Study Period as a result of the Proposed Action that did not appear to land at one of the Affected Airports during the Study Period (i.e., the "donut hole"). This donut hole provides the upper bound of the number of seaplanes that could reasonably be anticipated to have landed within Sag Harbor Bay. (That is, some seaplanes otherwise anticipated to operate at the New Airport may not have operated at all for a number of reasons, including the potential for their travelers to have sought another mode of travel as a result of the Proposed Action.)

Information with respect to the number of seaplane operations within Sag Harbor Bay is extremely limited as they occur outside the jurisdiction of the municipalities that bound the Bay and do not occur at an airport that may track the number of operations. The Lead Agency will request information on the number of seaplane operations within the bay from the neighboring municipalities, including the Village of Sag Harbor where it is assumed that the majority of commercial/ charter flight travelers would disembark from a water taxi/ launch after their seaplane trip. There is also the potential for information on Study Period and historical seaplane operations to be provided by launch operators, or other businesses.

Using the two methods described above, the DGEIS will examine whether the potential number of seaplane operations within Sag Harbor Bay potentially attributable to the Proposed Action may result in a significant adverse environmental impact. If so, those impacts shall be evaluated within the appropriate DGEIS Chapter using information that is reasonably available, given the data constraints mentioned above.

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C. Project History

1. Describe the history of EHA, including the development of aviation related infrastructure and facilities as well as non-aviation related facilities.
2. Describe the long-term change in flight operations at EHA, including the types of aircraft, times of aircraft operation, frequency of operations, and generalized off-site routing of operations. Include a discussion of seasonal variation.

D. Purpose and Need

1. Describe the Purpose and Need of the Proposed Action.

E. Summary of Approvals Required

1. List of approvals required by governmental agencies.

CHAPTER 2: AIRCRAFT NOISE

A. Introduction, Methodology and Summary of Findings

Summarize the methodologies used in the impact assessment and the key findings of aircraft noise impact analysis to determine the impacts of the Proposed Action at noise-sensitive land uses due to diverted aircraft.

B. No-Action Condition

Using the No-Action aircraft operation volumes presented in Chapter 1, describe and illustrate the 24-hour day-night noise level (“DNL”) contours surrounding the New Airport and Affected Airports in the No Action condition.³ Data should be presented for areas with DNL contours greater than or equal to 50 A-weighted decibels (“dBA”), in increments of 5 DNL. Both the land area and residential population within the contours should be presented with a focus on identifying sensitive land uses. To understand the variation in noise impacts during the year, DNL levels (and their resultant impacts) should be presented for the year as a whole, for the peak summer months only, and for a non-holiday peak weekend. As the DNL is a time-averaged metric with a weighting that accounts for additional sensitivity to noise during night-time hours, DNL accounts for both the duration of noise exposure and the time of day of exposure. Nevertheless, tabular data regarding flight operations during other potentially time-sensitive periods not captured in the DNL (i.e., those night-time periods before the curfew starts) will be presented in Chapter 1 and the impacts thereof described in this section.

³ DNL was selected as a metric for evaluation because it is an industry standard and is easily comparable across airports. Although 65 DNL is an FAA regulatory threshold, the Town is interested in evaluating at impacts at an even more fine-grained level, especially in light of the relatively low ambient noise that characterizes certain areas around the Affected Airports. The selection of 50 DNL as the minimum DNL presented was based on the lowest discernible level that can reliably be modeled from the dataset. This approach is consistent with FAA guidance indicating that supplementary metrics (such as DNL measurements below 65 DNL) can aid in the public’s understanding of community noise effects and that no single metric is suitable for all situations. By presenting DNL data at multiple levels and for multiple time periods, the Lead Agency is attempting to gather for itself, and present to the public, a wide range of information about the potential impacts of the Proposed Action.

While the DNL is typically reported in A-weighted decibels, which is the unit that most closely matches the human hearing response, DNL contours will also be established for C-weighted decibels (“dBC”) to allow for consideration of low-frequency noise effects. A-weighting allows sound measurements of various frequencies to be captured in a single number. For low-frequency noise, C-weighting is used, which requires little or no weighting given that the noise being evaluated is of a narrower range of (low) frequencies. Therefore, the C-weighted DNL (“CDNL”) tends to be higher when there is more low-frequency content in the noise spectrum. The FAA describes the CDNL as a metric that can be used to be more responsive to low-frequency noise, which is sometimes perceived as “vibration.”

Using publicly available and/or published data, describe the number and rate of complaints about aircraft noise in the areas surrounding the New Airport and Affected Airports during the No Action condition to the extent the information is reasonably available. See **Attachment B** for a detailed description of the methodology that will be used to collect noise complaint information. Complaint data will not be used as a threshold for significance, but rather as a potential indicator of relative changes in noise levels associated with operations. The limitations of noise complaint data as a measure of an airport’s impact will be described.

Based on the noise conditions described above, and the potential changes in flight patterns that may occur without the Proposed Action, qualitatively describe changes to noise impacts that are reasonably expected to occur in the Future Without the Proposed Action.

C. Potential Impacts of the Proposed Action

Using information obtained for the “Study Period,” describe and illustrate the area and population within the DNL contours greater than or equal to 50 dBA surrounding the New Airport and Affected Airports during the peak summer months and during a non-holiday peak weekend. Compare these conditions to the No Action condition.

Evaluate the potential health effects of aircraft noise by comparing predicted DNL noise exposure at residential or other noise-sensitive uses to health-related noise exposure recommendations as established by the World Health Organization (WHO). Compare the predicted exposure to the No Action condition.

Qualitatively consider potential changes in noise from on-ground aircraft operations during the Study Period from the No Action condition based on the total volume of aircraft movements at the New Airport and Affected Airports during the peak summer months and during a non-holiday peak weekend.

Consider low-frequency aircraft noise by comparing CDNL contours surrounding the New Airport and Affected Airports to CDNL contours in the No Action condition and identifying areas where low-frequency aircraft noise would noticeably increase.

Compare the number and rate of complaints about aircraft noise in the areas surrounding the New Airport and Affected Airports to the No Action condition to the extent that the information is reasonably available.

D. Mitigation Measures – Identify measures that may be able to be implemented, if any, that could mitigate potentially adverse noise impacts identified above.

CHAPTER 3: ENERGY USAGE, AIR QUALITY & CLIMATE CHANGE

A. Introduction, Methodology and Summary of Findings.

Summarize the methodologies used in the impact assessment and the key findings of the existing conditions survey, the analysis of the potential impacts of the Proposed Action, and measures proposed to mitigate impacts from the Proposed Action.

B. No Action Condition

Describe existing ambient air quality using information from NYSDEC’s Ambient Air Quality Monitoring Network. In addition, describe the latest information regarding the status of the State Implementation Plan (SIP) and attainment status. The known health risks and regulatory context associated with criteria pollutants will be discussed.

Describe the potential cumulative impacts to air quality resulting from any known future developments that may significantly affect the volume or traffic patterns at the roadway intersections identified and studied in Chapter 4.

C. Potential Impacts of the Proposed Action

1. Regional Emissions Analysis

Using the changes to flight operations at the New Airport and the Affected Airports attributable to the Proposed Action, as described in Chapter 1, and the changes in vehicular traffic patterns attributable to the Proposed Project, as described in Chapter 4, quantify the potential change in annual emissions within Suffolk County associated with diverted aircraft and vehicle engine emissions. The analysis will include emissions of carbon monoxide (CO), particulate matter (PM), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), lead, ozone (O₃), as well as potential hazardous air pollutants (HAPs) associated with aircraft fuel consumption. Potential increases will be compared to the federal de minimis emission thresholds to ensure that the Proposed Action would conform to New York State’s SIP. Currently the federal de minimis thresholds for Suffolk County are 50 tons per year for volatile organic compounds (VOCs) or oxides of nitrogen (NO_x), and 100 tons per year for all other criteria pollutants.

Quantify the change in Greenhouse Gas (GHG) emissions (and energy usage) attributable to the Proposed Action, based on available information. Changes in the number, type, and distance of flights as well as changes in traffic patterns, should be used as inputs to this analysis. The GHG analysis will quantify emissions for the Proposed Action as well as the No Action Alternative. The total emissions of both alternatives will be compared to the Town of East Hampton’s sustainability and GHG reduction goals as well as New York State’s statewide GHG reduction goals.

2. Mobile Source Analysis—Vehicle Diversions

a. Carbon Monoxide (CO)

Perform a screening analysis of intersections evaluated in Chapter 4 to determine the potential for significant carbon monoxide impacts and to determine which locations may need further detailed study. Intersections will be chosen based on the procedures outlined in the New York State Department of Transportation (NYSDOT) *The Environmental Manual* (“TEM”), or latest available NYSDOT guidance and the

United States Environmental Protection Agency's ("EPA") *Guidelines for Modeling Carbon Monoxide Roadway Intersections*.

For intersections with a Level of Service of "D" or worse in the With Action Condition, use the TEM capture criteria to determine whether intersections require further study. If any of the capture criteria are met, perform a volume threshold screening analysis at affected intersections. The intersections selected for the screening analysis will be based on the traffic network.

If any intersections do not pass the volume threshold screening criteria, a mobile source analysis would be performed using vehicular CO engine emission factors from EPA's MOVES model based on provided speed and vehicle mix data and EPA's AERMOD dispersion model to predict the maximum change in carbon monoxide concentrations, and to determine if the potential for exceedances of the carbon monoxide ambient standard exists at the analyzed intersections. The area to be included in this modeling effort will follow EPA's recommendations in the *Guideline for Modeling Carbon Monoxide from Roadway Intersections* (i.e., all significant mobile source emissions within 1,000 feet of the intersection of concern).

b. Particulate Matter (PM)

Perform a screening analysis for particulate matter (PM) less than 10 microns and less than 2.5 microns in diameter (PM₁₀ and PM_{2.5}) from mobile sources. Based on EPA guidance regarding PM, traffic data for the intersections that would be affected by the Proposed Action, such as the Level of Service at these intersections, the increase in the number of diesel vehicles, and potential receptor locations, will be considered to determine whether a refined microscale modeling analysis would be warranted for PM₁₀ and PM_{2.5}.

If the screening analysis indicates the need for a refined PM analysis, maximum predicted PM₁₀/PM_{2.5} concentrations will be determined using appropriate MOVES emission factors and applying corresponding traffic data from Chapter 4, including but not limited to vehicle classification, average vehicle speed, and vehicle diversion volumes. Following the procedures outlined in the Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas, 24-hour PM₁₀ and PM_{2.5} and annual average PM_{2.5} concentrations will be determined using the EPA's AERMOD model at simulated receptors for the critical analysis year. Using the procedures in the Transportation Conformity Guidance, four peak hour periods (morning peak, midday, evening peak, and overnight) will be analyzed using the latest available 5-year data-set from the most representative meteorological station near the analyzed intersections. Maximum predicted PM₁₀/PM_{2.5} concentrations will be compared to the National Ambient Air Quality Standards and the potential for significant adverse air quality impacts would be determined.

3. Mobile Source Analysis—Aircraft Diversions

The potential air quality impacts and potential deposition of PM from emissions associated with diverted aircraft engines, supporting ground vehicle emissions, and diverted vehicle emissions from employees/travelers (including travel and idles emissions) will be qualitatively discussed in this section. The discussion will include a quantification of the No Action emissions at the New Airport and the Affected Airports

from aircraft operations, changes to those emissions as a result of the Proposed Action, the distance for those emissions to sensitive receptors, and the meteorological conditions at the airports.

The Proposed Action would not result in additional fuel storage or process operations associated with known odor compounds. Therefore, the impact to odors from fuel combustion emissions will be discussed qualitatively based on the results of both the regional emissions analysis and the airplane diversion analysis at the New Airport and Affected Airports.

If the potential for air quality impacts is identified using the screening level analysis, a refined air quality modeling analysis will be performed using the EPA AERMOD dispersion model, detailed building and receptor information, and five years of meteorological data and upper air data to determine if significant adverse air quality impacts are expected. As such, the determination of potential impact will consider factors beyond the number of aircraft landing/take-offs for each of the airports analyzed. The assessment will quantify total pollutant emissions, change in pollutant emissions, distances between sources and receptors, and the applicable meteorological conditions.

If exceedance of a public health threshold is determined as a result of the Proposed Action, a public health analysis will be performed to evaluate potential impacts to public health.

D. Mitigation Measures

Identify measures that may be able to be implemented, if any, that could mitigate potentially adverse impacts on air quality, GHG emissions, or energy usage identified above.

CHAPTER 4: VEHICULAR TRAFFIC

A. Introduction, Methodology and Summary of Findings

Summarize the methodologies used in the impact assessment and the key findings of a traffic impact assessment (TIA) performed to determine the impacts of the Proposed Action at key roadways and intersections due to changes in traffic patterns that are the result either of aircraft that may be diverted from the New Airport to the Affected Airports and the resultant changes in ground-based travel or increases in vehicular traffic as a result of changed modes of travel to the Town. The full TIA shall be included as an appendix to the DGEIS.

B. No-Action Condition

1. Describe the existing roadway characteristics in the area surrounding the New Airport and Affected Airports.
2. Determine the No Action traffic volumes and turning movements at the following intersections listed below (see maps of each area and its intersections in **Figures 3 through 6**) during the weekday morning and evening peak hours, a non-holiday weekend peak hour (i.e., Friday evening or Monday morning) in July or August, one holiday or holiday-weekend peak hour period, and one off-peak hour.

These are the intersections identified as potentially being affected by the Proposed Action. For background information, determine the “off-season” volumes and movements at these same intersections.

- a. Vicinity of New Airport
 - i. Daniel’s Hole Road at Airport Entrance*
 - ii. Wainscott Northwest Road at NY 114*
 - iii. Wainscott Northwest Road at South Breeze Drive*
 - iv. NY 114 at South Breeze Drive*
 - v. NY 27 at Daniel’s Hole Road*
 - vi. Route 27 (Montauk Highway) at Wainscott Northwest Road °
 - vii. Route 27 at Georgica Drive °
 - viii. Route 27 at Old Montauk Highway °
 - ix. Route 27 at Wainscott Stone Road °
 - x. Wainscott Northwest Road at Industrial Road °
 - xi. Daniel’s Hole Road at Industrial Road °
- b. Vicinity of Gabreski Airport
 - i. County Road 31 at Southerly Airport Entrance*
 - ii. County Road 31 at Montauk Highway (County Road 80)*
 - iii. County Road 31 at Stewart Avenue/Collins Way °
- c. Vicinity of Montauk Airport
 - i. East Lake Drive at Airport Entrance*
 - ii. NY 27 at East Lake Drive*
 - iii. NY 27 at West Lake Drive*
 - iv. NY 27 at Edgemere Street (County Road 49, east intersection)*
 - v. NY 27 at Old Montauk Highway/Second House Road*
- d. Vicinity of Village of Southampton Heliport
 - i. Entrance to combined Beach/Helipad Parking Area on south side of Meadow Lane*
 - ii. Meadow Lane at Halsey Neck Lane*

No Action traffic volumes and movements will be determined using a combination of historical traffic data, anticipated to be available at intersections marked with a ° in the above list, as well data from a traffic counting subcontractor for the intersections marked with a *. Historical traffic volumes will be obtained from traffic counts conducted by the NY State Department of Transportation, the Suffolk County Department of Public Works, or from Traffic Impact Studies submitted to government agencies for approval by developers of private property. The count data must be recent, having been collected within the last five years to be relevant. Counts to be collected by the subcontractor will occur in 2022. In addition, information about roadways utilized by motorists traveling to and from the airports, both in the past and in 2022, will be provided by INRIX’s Trip Paths application. Traffic volumes will be adjusted to the year 2022 using available traffic count factors.

Identify known future developments that may significantly affect the traffic volume or patterns at the studied intersections as well as changes to the study area roadways that would affect the Level of Service (LOS). As needed, include these elements in the No Action conditions. Future developments to be included are the 521 East Lake Drive marina project; the 435 East Lake Drive resort/motel, restaurant, and fitness center project; and the Montauk Sunset Cottages resort at 31 and 41 East Lake Drive.

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Once the No Action volumes are established, the TIA shall conduct capacity analysis (LOS) for each of the above intersections using the latest revision of the Highway Capacity Software/SYNCHRO software. The TIA and DGEIS shall summarize the No Action conditions LOS in tabular format.

A qualitative assessment of traffic impacts on NY 27/County Road 39, east of Gabreski Airport will be performed.

The public transportation systems and pedestrian/bicycle facilities within the Traffic Study Area will be summarized, including the location of transit stops, frequency of service, and the presence of passenger amenities.

The most recent 5 years of available crash data records for the study area intersections shall be obtained and summarized by type of accident, time, severity, pavement condition and apparent contributing factors. Significant trends will be noted and measures to mitigate those trends will be identified.

C. Potential Impacts of the Proposed Action

Conduct a Traffic Impact Assessment (TIA) of the Proposed Action. In the TIA, include the collection of traffic volume and turning movement data at the intersections identified above during the Study Period that corresponds to the No Action hours of study. Data is anticipated to be collected using a combination of traditional traffic counts and from a location-based data provider. Using this data, perform traffic capacity analyses at the study area intersections and present LOS in tabular format. Based on the projected traffic increases associated with the Proposed Action, include a qualitative assessment of impacts on emergency response services.

D. Mitigation Measures – Identify in the TIA mitigation measures that may be able to be implemented, which could mitigate potentially significant adverse traffic capacity impacts of the Proposed Action. These may include roadway improvements (such as installation of turn lanes or modification of traffic control/signal timing at intersections) and/or transit improvements (such as the implementation of shuttle bus service). Similarly, identify in the TIA measures to mitigate potentially significant adverse traffic impacts to vehicular, pedestrian and bicycle safety.

CHAPTER 5: VEHICULAR NOISE

A. Introduction, Methodology and Summary of Findings

Summarize the methodologies used in the impact assessment and the key findings of a noise impact analysis performed to determine the impacts of the Proposed Action at noise-sensitive land uses where vehicular traffic may be substantially increased due to diversions to the Affected Airports or due to vehicular traffic that replaces aircraft trips.

B. No-Action Condition

Using a combination of previously conducted studies as well as newly conducted traffic counts, identify the No Action peak hourly noise levels at representative sensitive locations along roadways where the Proposed Action may substantially increase traffic noise and where aircraft operations are not the dominant source of noise. To establish the No Action noise levels, the identified noise data shall be adjusted based on the difference in traffic volumes at the time of collection and the No Action traffic conditions, described above.

C. Potential Impacts of the Proposed Action

With Action noise levels shall be obtained through a combination of traffic counts taken during the Study Period and previously collected data, adjusted based on the With Action traffic volumes.

The With Action noise levels shall be compared to the No Action noise levels. Changes in noise levels as a result of the Proposed Action shall be compared to NYSDEC guidance to determine the potential for a significant adverse impact.

D. Mitigation Measures – Identify measures that may be able to be implemented, if any, that could mitigate potentially significant adverse noise impacts identified above.

CHAPTER 6: NATURAL RESOURCES

The airport property includes large areas of open space with rare ecological communities, which include pitch pine-oak forest of the Long Island Pine Barrens, considered to be imperiled or vulnerable in New York, and the globally rare Atlantic coastal plains grasslands ecological community surrounding the runways that provide habitat for numerous species of endangered, threatened, or rare plant species and plant species of special concern. These ecological communities support a variety of species of wildlife, including rare moth species, and are significant groundwater recharge areas. The airport property is designated a Critical Environmental Area to protect these areas for groundwater recharge and drinking water supplies. Similarly, the Affected Airports also support or are adjacent to ecological communities that support plant and wildlife threatened or endangered, rare or species of special concern.

A. Introduction, Methodology and Summary of Findings

Summarize the methodologies used in the impact assessment and the key findings of the ecological communities and wildlife species with the potential to be affected by noise and flight patterns, potential impacts from the Proposed Action, and proposed mitigation measures.

B. No-Action Condition

Based on existing information, characterize the existing ecological communities, wildlife, and threatened or endangered plant and animal species on and in the vicinity of the New Airport and the Affected Airports. Existing wildlife species that have the potential to be affected by noise generated by airplane/helicopter noise and flight patterns will be identified, including the seasonal sensitivity. Existing noise levels, frequency of flights and flight patterns relevant to these wildlife will be summarized from Chapters 2, 4, and 5.

C. Potential Impacts of the Proposed Action

Identify the potential for the Proposed Action to result in direct and indirect impacts to ecological communities, wildlife, and threatened or endangered species. The assessment will consider potential impacts due to changes in airport operation at the New Airport and Affected Airports, including incremental changes in noise level, aircraft flight patterns and frequency, and incremental increases in vehicular traffic and noise. Potential impacts to wildlife will be based on the results of empirical studies of the effects of flight noise and visibility of aircraft, roadway noise, and vehicle movement.

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D. Mitigation Measures

Identify mitigation measures that may be able to be implemented, if any, that could mitigate potentially significant adverse impacts to ecological communities and wildlife resulting from the Proposed Action.

CHAPTER 7: LAND USE, PUBLIC POLICY, AND COMMUNITY CHARACTER

A. Introduction, Methodology and Summary of Findings

Summarize the methodologies used in the impact assessment and the key findings of the analysis of the consistency of the Proposed Action with existing land uses proximate to the New Airport and Affected Airports and with relevant public policies.

B. Land Use

1. No Action Condition – Describe and illustrate the land uses proximate to the New Airport and Affected Airports and the off-site routing associated with each (i.e., take-off and landing routes).⁴ Describe changes to the existing land use conditions described above that are reasonably expected to occur in the future without the Proposed Action (i.e., 2023).
2. Potential Impacts of the Proposed Action – Based on the change in flight operations described in Chapter 1, qualitatively describe the Proposed Action’s potential impacts to, and consistency with, the land uses surrounding the New Airport and Affected Airports.
3. Mitigation Measures – Identify measures that may be able to be implemented, if any, that could mitigate potentially adverse impacts to land uses surrounding the New Airport and Affected Airports.

C. Public Policy

Describe the consistency of the Proposed Action with the public policy documents listed below.

1. Town of East Hampton Comprehensive Plan
2. Town of East Hampton Hamlet Studies (Montauk, Wainscott, Amagansett, Springs, East Hampton)
3. Town of East Hampton Climate Action Plan and the adoption of the Climate Emergency Declaration in 2021 (Resolution 2021-329)

⁴ Land Uses and Community Character shall be described for the larger of the area within the 50 DNL contour in the “No Action” condition or “With Action” condition for each airport, but in all cases the area shall not be less than 1 mile from the airport.

D. Community Character⁵

1. No Action Conditions – Using text, graphics, and photographs, describe the community character of the Town of East Hampton, focusing on the areas affected by the New Airport and the Proposed Action. Included in this discussion should be the Town’s Scenic Area of Statewide Significance (SASS). Describe the community character of the areas surrounding the New Airport and Affected Airports, including areas of protected open space and Critical Environmental Areas.

Identify Potential Environmental Justice Areas (PEJA) proximate to the New Airport and the Affected Airports that, based on the analyses in the DGEIS, may experience a significant adverse environmental impact as a result of the Proposed Action. PEJAs are defined by the NYSDEC as minority or low-income communities that may bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.⁶ The NYSDEC has identified PEJAs as census block groups that meet or exceed one of the following thresholds⁷:

1. At least 52.42% of the population in an urban area reported themselves to be members of minority groups; or
2. At least 26.28% of the population in a rural area reported themselves to be members of minority groups; or
3. At least 22.82% of the population in an urban or rural area had household incomes below the federal poverty level.

Describe changes to the community character described above that are reasonably expected to occur without the Proposed Action.

2. Potential Impacts of the Proposed Action – Utilizing the information about changes in flight operations described in Chapter 1, and the results of the environmental analyses in the other chapters of the DGEIS, qualitatively describe the Proposed Action’s potential impacts to, and consistency with, the community character surrounding the New Airport and Affected Airports.

Identify potential significant adverse impacts to PEJAs. If a significant adverse impact would occur substantially within a PEJA, identify the additional environmental burden on the PEJA as a result of the Proposed Action.

3. Mitigation Measures – Identify measures that may be able to be implemented, if any, that could mitigate potentially adverse impacts to community character surrounding the New Airport and Affected Airports.

⁵ As stated in the SEQRA Handbook (2020), “Community character relates not only to the built and natural environments of a community, but also to how people function within and perceive that community. Evaluation of potential impacts upon community or neighborhood character is often difficult to define by quantitative measures. Courts have supported reliance upon a municipality’s comprehensive plan and zoning as expressions of the community’s desired future state or character.”

⁶ NYSDEC; CP-29.

⁷ <https://www.dec.ny.gov/public/911.html>, Accessed April 8, 2022.

CHAPTER 8: ALTERNATIVES

SEQRA requires an evaluation of the range of reasonable alternatives to the Proposed Action that are feasible and within the control of the Project Sponsor. As required by SEQRA, the level of detail for each alternative will be commensurate with what is required for the public and Lead Agency to understand the relative differences in impacts and the significance thereof. A quantitative analysis of all impacts for all alternatives will not be, and cannot be, conducted. The range of alternatives selected are anticipated to provide an upper and lower limit of potential impacts such that if alternative operational strategies are contemplated in the future, the associated impacts would be expected to fall within the range of impacts evaluated in the DGEIS.

For purposes of the DGEIS, the analysis of alternatives will be based on the information collected to evaluate the Proposed Action, as well as other past studies of similar policy proposals, if any. In the absence of empirical data to determine how travelers may modify their behavior based on the implementation of Alternatives B, C, and D, the evaluation of impacts of these alternatives will be based on a number of assumptions that will be described in the DGEIS. Nevertheless, as required under SEQRA, the analysis of alternatives will provide the Lead Agency, and the public, the information necessary to understand the relative differences in impacts as well as the potential magnitude and significance of those impacts as compared to the Proposed Action.

A. Introduction and Summary of Findings

Summarize the key findings of the analysis of alternatives to the Proposed Action. Include a table comparing the potential impacts of the various alternatives to those of the Proposed Action.

B. Alternative A: No Action Alternative

Describe the potential environmental impacts of not implementing the Proposed Action and continuing to operate the New Airport in the manner in which it was operated as a public-use airport. This alternative shall take into account potential changes in airport operations that, based on historical patterns, have the potential to change the future operations of the airport.

C. Alternative B: Closure of the New Airport Alternative

Describe the potential environmental impacts of closing the New Airport to all air traffic. Impacts associated with repurposing or redevelopment of the New Airport would be highly dependent on the type, location, and extent of future activity. As the Town has no plans to redevelop or repurpose the New Airport, this alternative will qualitatively discuss potential impacts associated with closure and possible reuse and will not attempt to analyze the potential impacts of a specific redevelopment option.

D. Alternative C: Alternative Restrictions

As a private-use airport, the Town has the ability to place a wide range of restrictions on activity at the New Airport, which may differ from those contemplated by the Proposed Action. Similarly, the Town may modify the specific features of the various categories of proposed long-term restrictions that are contemplated as the Proposed Action. Using the information presented in Chapter 1, and the balance of this DGEIS, this alternative will qualitatively analyze the potential impacts associated with modifications to the flight restrictions considered by the Proposed Action. Specifically, changes to the time-based, aircraft-based, noise-based, and operator-based permissions will be analyzed.

E. Alternative D: Acquisition of Montauk Airport

Comments were received during the public scoping period suggesting that the Town of East Hampton should consider acquiring the privately-owned Montauk Airport and implementing a PPR system similar to the Proposed Action at that airport. These comments were premised on the belief that that this action could reduce or mitigate potential adverse impacts associated with potential increases in airport operations at Montauk Airport that may occur as a result of the Proposed Action. While making no determinations as to the feasibility or practicability of implementing this alternative, the Town believes that it is a reasonable alternative to consider within the DGEIS.

CHAPTER 9: MITIGATION MEASURES

Measures to mitigate potential significant adverse impacts from the Proposed Action that are identified in the analyses described above will be summarized in this chapter. Given the programmatic nature of the Proposed Action, many of the measures preliminarily identified as potential mitigation measures are also programmatic in nature. For example, comments were received on the draft DGEIS Scope suggesting that the DGEIS evaluate the potential for increased transit service, including trains and ferries, as a way to minimize overall demand for air travel to the region. The DGEIS may also analyze the potential efficacy of policies regulating flight operations at the Affected Airports or changes in the routing of flight operations. Subject to the results of the impact assessments, the implementation of a number of the potential mitigation measures may not be within the control of the Town Board, other municipal boards, or the operators of other airports. The DGEIS will identify and discuss the efficacy and practicality of implementing mitigation measures for significant impacts that are identified in the DGEIS.

CHAPTER 10: SEQRA REQUIRED ANALYSES

Pursuant to SEQRA regulations, the following impact analyses will be included in the DGEIS.

- A. Growth Inducing Effects
- B. Special Groundwater Protection Area Impacts
- C. Irreversible and Irrecoverable Commitment of Resources
- D. Unavoidable Adverse Impacts
- E. Environmental Reviews Required for Potential Future Operational Changes – This section of the DGEIS shall discuss whether, and to what extent, future changes in airport flight restrictions would require environmental analysis given the findings in the DGEIS.

F. ENVIRONMENTAL CATEGORIES NOT REQUIRING FURTHER ANALYSIS

Pursuant to §617.8(e)(7) of the SEQRA regulations, 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.

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Attachment C 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) for the reasons set forth therein. *