Final Generic Environmental Impact Statement

City of Syracuse Proposed Lead Ordinance April 2020

Prepared for

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FOR THE

CITY OF SYRACUSE PROPOSED LEAD ORDINANCE

City of Syracuse, Onondaga County, New York

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Date Accepted by Lead Agency:
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ACRONYMS AND ABBREVIATIONS

Acronym/ Abbreviation	Definition/Denotation
AMSL	Above Mean Sea Level
BMPs	Best Management Practices
CRIS	Cultural Resource Information System
DGEIS	Draft Environmental Impact Statement
EAF	Environmental Assessment Form
EBLL	Elevated blood lead level
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FGEIS	Final Environmental Impact Statement
GEIS	Generic Impact Statement
GIS	Geographic Information Systems
GPS	Global Positioning System
µg/dL	Microgram per Deciliter
µM	Micrometer
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historical Places
NYNHP	New York Natural Heritage Program
NYSDEC	New York State Department of Environmental Conservation
NYSOPRHP	New York State Office of Parks, Recreation, and Historic Preservation
SEQR	State Environmental Quality Review Act
SHPO	State Historic Preservation Office
SPDES	State Pollutant Discharge Elimination System
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

FIRMS/ORGANIZATIONS INVOLVED IN THE PREPARATION OF THE DGEIS

AND FGEIS

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1.0 EXECUTIVE SUMMARY

The City of Syracuse (hereafter, "City") is proposing to amend its municipal property conservation code to provide the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The Ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures to be identified and correctly addressed.

Lead exposure is an extremely serious problem that has affected children living in the City of Syracuse for decades, often with lifelong impacts. Recent studies indicate that 10.4% (498) of tested children under age 6 in the City of Syracuse have an elevated blood lead level (EBLL) greater than or equal to 5 micrograms per deciliter (µg/dL).[1] Notably, the 2018 count and percentage of children testing positive for EBLL are significantly lower than historic averages – this illustrates the degree to which issues of lead exposure have affected children and adult residents in the City of Syracuse for years with impacts experienced on a tremendous scale over the course of decades. In addition, 87% of all children with EBLL in Onondaga County reside in the City[2], where nearly all single, two, and three-family structures were built before 1978.

1.1 PURPOSE, NEED, AND BENEFIT

The need for a lead ordinance is based on the significant impact that lead exposure has on residents, especially children. The City of Syracuse Proposed Lead Ordinance's main objective is to reduce the rate of lead exposure in the City. New York State's policy framework for primary prevention to address lead hazards in housing before children are effected provides limited financial resources. Onondaga County is one of 15 counties meeting NYSDOH's criteria to be identified as a "community of concern", with the city of Syracuse containing five "high risk targeted zip codes" serving as the basis for this designation. Onondaga County's current funding allocation does not support the capacity needed for a health department-driven comprehensive inspection and

[1] Onondaga County Health Department. 2018 Annual Report. Published April 8, 2019. 43 pages. Available at http://www.ongov.net/health/documents/2018OCHDAnnualReport.pdf

[2] Onondaga County Health Department. 2018 Annual Report. Published April 8, 2019. 43 pages. Available at http://www.ongov.net/health/documents/2018OCHDAnnualReport.pdf

enforcement approach and relies on the limited enforcement scope outlined in public health law. Yet, the local allocation has benefited the community by supporting increased collaboration between city, county and community based organization efforts for targeting high risk areas, identifying gaps in enforcement capacity, sharing of parcel level data and more. New York State Department of Health (NYSDOH) requires lead testing for children at ages one and two and provides for educational and environmental interventions for children after they are identified with elevated EBLL; however, this program enacts measures after lead exposure occurs. The City of Syracuse proposed Ordinance defines methods to control lead hazards before exposure occurs.

The Center for Disease Control (CDC) has published information about the causes and effects of childhood lead poisoning. According to the CDC, lead can affect almost every organ and system in the body, especially the nervous system. It can cause learning disabilities and behavioral problems. At very high levels, it can cause seizures, coma, and even death. Children are more vulnerable to lead than adults; and according to the CDC, the first 6 years of life are critical as this time is when the brain grows the fastest[3].

Lead is a potent chemical element that can cause major health problems upon exposure. Lead enters the body through inhalation, absorption, and ingestion, all of which can lead to health risks. Upon contact, lead is absorbed into bones, blood, and tissue, where it is temporarily stored and continuously exposes the body to contamination[4]. Contamination can effect almost every organ and system in the human body, with particular risk to the nervous system[5]. Prolonged exposure to lead allows it to accumulate in the body, leading to the build-up of harmful contamination that can have both short- and long-term effects. A person may experience short-term effects of lead contamination when they are exposed to high levels of lead in a small period of time. Short-term effects include fatigue, headaches, memory loss, and tiredness. However, more severe symptoms to extremely high levels can include anemia, weakness, kidney and brain damage, and in some

[3] Center for Disease Control. Childhood Lead Poisoning. Available at https://ephtracking.cdc.gov/showLeadPoisoningEnv. Accessed December 2, 2019.

[4] Gulson, B. L., Mahaffey, K. R., Mizon, K. J., Korsch, M. J., Cameron, M. A., & Vimpani, G. (1995). Contribution of tissue lead to blood lead in adult female subjects based on stable lead isotope methods. The Journal of laboratory and clinical medicine, 125(6), 703-712.

[5] Center for Disease Control and Prevention. (2018). Lead, Information for workers, health problems caused by lead. *National Institute for Occupational Safety and Health.*

extreme cases, even death[6]. Long-term effects of lead exposure, which take place over the course of several years, can occur at a dosage of as little as 5 µg/dL (US Department of Health and Human Services, 2019), and can cause nausea, depression, constipation, and abdominal pain. More severe effects from prolonged exposure include high blood pressure, heart and kidney disease, and reduced fertility. It is also suspected by the Department of Health and Human Services, Environmental Protection Agency, and International Agency for Research on Cancer that prolonged exposure to lead can be a major cause of cancer. More subtle effects, which often go un-diagnosed as a product of lead-contamination, include cognitive and neurological defects, congenital malformations, and inhibited growth and development[7].

Children are especially susceptible to lead contamination, particularly children under six years old, because their bodies absorb lead 4-5 times faster than adults, leading to a magnification of contamination effects[8]. The rapid cognitive and physical development of children and infants also increases their risk to lead exposure, and can lead to lifelong harm. Cognitive development can be impeded by lead exposure, leading to the development of neurological conditions such as altered neuromotor and neurosensory function, hearing loss, and learning and behavioral abnormalities[9]. Physical damages to lead contamination include seizures, comas, immunotoxicity, and in severe cases, death. Unlike lead exposure in adults, which may be reversible, contamination in children often causes permanent damage with lifelong repercussions[10]. The most common damage has been seen at exposures between 5 and 50 µg/dL, however, there is no known threshold to safe lead exposure, as any amount is known to cause serious and permanent harm[11].

The New England Journal of Medicine has published several studies concerning lead exposure affects on a child's IQ score. In the "*Intellectual Impairments in Children with Blood Lead Concentrations below 10µg per Deciliter*", Canfield et. al. concludes that blood level

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[6] Center for Disease Control and Prevention. (2018). Lead, Information for workers, health problems caused by lead. *National Institute for Occupational Safety and Health.*

[7] Goyer, R. A. (1990). Lead toxicity: from overt to subclinical health effects. *Environmental Health Perspectives*.

[8] World Health Organization. (2019). Lead poisoning and health. *World Health Organization News Room.*

[9] World Health Organization. (2019). Lead poisoning and health. *World Health Organization News Room.*

[10] Center for Disease Control and Prevention. (2020.) Childhood lead poisoning prevention, health effects of lead exposure. U.S. Department of Health & Human Services.

[11] United States Department of Health and Human Services. (2019). Toxicological profile for lead. *Agency for Toxic Substances and Disease Registry*.

concentrations, even those below 10µg per deciliter, are inversely associated with children's IQ scores[12].

In addition, Professor Katrina Smith Korfmacher of the University of Rochester has studied the issue of lead poisoning and its impact on economic achievement, and provides a summary of her analysis in the *Long-term costs of lead poisoning: How much can New York save by stopping lead?* dated July 9, 2003. This study reveals significant costs associated with lead beyond health care including income loss, educational impacts, costs to the criminal justice system, and other societal costs[13]. Economic research indicates that individuals with lower IQ generally have reduced income. Given EBLL is known to negatively affect IQ in individuals, it can be deduced that elevated blood levels limit a person's income potential. In addition, Dr. Korfmacher provides an assessment of how reduced income effects the economy of the State of New York as a result of loss tax revenues and indicates that, in 2003, New York state may have observed loss of nearly $78 million in tax dollars a result of children's earning potential being reduced from EBLL[14]. EBLL is also attributed to the need for special education. These additional education costs are paid for by local taxpayers. Korfmacher also provides a summary of additional tax payer costs associated with criminal activity. She suggests that EBLL contributes to delinquent behavior and crime; related costs include those associated with legal fees, incarceration costs, and costs to victims. Detailed economic figures with respect to income loss, educational impacts, costs to the criminal justice system, and other societal costs observed in the City of Syracuse are not provided herein; however, it is reasonable to deduce that EBLL has significant effects with respect to the local and State economy. The discussion of these monetary factors are provided to demonstrate that the effects of lead exposure extend beyond health implications.

1.2 REGULATORY PROCESS

The SEQR process was recently initiated for the proposed Ordinance. The basic purpose of SEQR is to incorporate the consideration of environmental factors into the existing planning, review, and

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[12] Canfield et. al. 2003. *Intellectual Impairment in Children with Blood Lead Concentrations below 10µ per Deciliter*. New England Journal of Medicine.

[13] Kormacher, Katrina Smith, PhD. *Long-term costs of lead poisoning: How much can New York save by stopping lead?.* July 9, 2003. 11 pages.

[14] Kormacher, Katrina Smith, PhD. *Long-term costs of lead poisoning: How much can New York save by stopping lead?.* July 9, 2003. 11 pages.

decision-making processes of state, regional, and local government agencies at the earliest possible time. To accomplish this goal, SEQR requires a determination of whether a proposed action may have a significant impact on the environment, and if it is determined that the action may have a significant adverse impact, prepare or request an Environmental Impact Statement (EIS). It was the intention of the State Legislature that protection and enhancement of the environment, human, and community resources should be given appropriate weight with social and economic considerations. Accordingly, it is intended that a suitable balance of social, economic, and environmental factors be incorporated into the planning and decision-making processes of state, regional, and local agencies. However, it is not the intention of SEQR that environmental factors be the sole consideration in decision-making.

A Generic EIS is a type of EIS that is typically used to consider broad-based actions or related groups of actions that agencies may approve, fund, or directly undertake. GEIS documents are more general or conceptual in nature. These documents provide an overall assessment of the project's potential effect on the environment, and develop standards and mitigating measures to follow for subsequent actions. As such, a GEIS is the recommended action.

The SEQR process for the proposed Ordinance has included or will include the following actions:

- Preparation of Parts 1, 2, and 3 of a Full Environmental Assessment Form (EAF).
- Issuance of a Positive Declaration.
- Preparation of a Draft Scoping Document.
- Public Scoping Process.
- Issuance of Final Scoping Document.
- Preparation of the Draft Generic Environmental Impact Statement (DGEIS).
- Notice of completion of DGEIS and notice of public information meeting and comment period.
- Public information meeting on DGEIS.
- A minimum 30-day public comment period on the DGEIS.
- Revisions to the DGEIS as necessary to address substantive/relevant comments received.

- Preparation of Final GEIS (FGEIS).
- Filing notice of completion of FGEIS.
- 10-day consideration period.
- Issuance of Findings Statement.

Opportunities for detailed agency and public review in relation to this specific action have been provided throughout the SEQR process. The DGEIS, along with a copy of the public notice, was distributed for review and comment to the public and involved/interested agencies. In addition to a public comment period running from February 5, 2020 through March 5, 2020 (during which time written comments were accepted), a public information meeting concerning the DGEIS was held on February 12, 2020. All public comments received during the public comment period and public information meeting, along with responses, are provided in Appendix E to the FGEIS.

Additionally, SEQR regulations require EISs be posted on a publicly accessible internet website. The DGEIS has previously been posted and will remain posted until the FGEIS is accepted, at which point the FGEIS will be posted. The FGEIS must remain posted until one (1) year after all final approvals have been issued for the Project that is the subject of the FGEIS. In accordance with this amendment to SEQR, the FGEIS will be posted to:

http://www.syrgov.net/Neighborhood_and_Business_Development.aspx.

1.3 SUMMARY OF POTENTIAL IMPACTS

In accordance with requirements of the SEQR process, potential impacts arising from the proposed action were evaluated with respect to an array of environmental, social and cultural resources. The analysis of potential impacts is summarized in Table 1.

Table 1. Summary of Potential Environmental Impacts.

Topic	Potential Impacts
Geology, Soils, and Topography	No impact to geology, soils, and topography will occur as a result of this project.
Water Resources	No impact to waterways will occur as a result of this project.
Climate and Air Quality	No impact to climate and air quality will occur as a result of this project.
Biological, Terrestrial, and Aquatic Ecology	No impact to biological, terrestrial, and aquatic ecology will occur as a result of this project.
Aesthetic/Visual Resources	No impact to aesthetic/visual resources will occur as a result of this project.
Historic, Cultural, and Archaeological Resources	No significant impacts to archeological resources will occur; however, the Ordinance has the potential to affect historic structures. The Ordinance does not mandate physical alteration to historic structures; however, physical alterations (i.e. windows, porches, doors) to the exterior and interior of historic structures may occur.
Open Space and Recreation	No impact to open space and recreation areas will occur as a result of this project.
Traffic and Transportation	No impact to traffic and transportation will occur as a result of this project.
Noise and Odor	No impact associated with noise and odor will occur as a result of this project.
Documented Environmental Conditions	No impact associated with documented environmental conditions will occur as a result of this project.
Public Health and Safety	Lead remediation activities could result in an increase in potential lead exposure if not performed adequately. Potential risks include an inadvertent release of lead contaminated dust into the air, spreading lead contaminated dust to other areas of a structure as a result of improper cleaning, or creating fumes containing lead.
Land Use and Zoning	No impact to land use and zoning will occur as a result of this project.
Growth and Community Character	Items to consider include retaliatory eviction, disclosure and other requirements upon property transfer, and the potential for housing abandonment associated with cost of remediation activities.
Community Facilities and Services	No impact to community facilities and services will occur as a result of this project.

1.4 SUMMARY OF MITIGATION MEASURES

The Project will include various measures to avoid, minimize and/or mitigate potential environmental impacts, as described in Table 2.

Table 2. Summary of Measures to Avoid, Minimize, and/or Mitigate Impacts

Topic	Proposed Avoidance/Mitigation Measures
Geology, Soils, and Topography	No avoidance or mitigation measures are necessary
Water Resources	No avoidance or mitigation measures are necessary
Climate and Air Quality	No avoidance or mitigation measures are necessary
Biological, Terrestrial, and Aquatic Ecology	No avoidance or mitigation measures are necessary
Aesthetic/Visual Resources	No avoidance or mitigation measures are necessary
Historic, Cultural, and Archaeological Resources	No impacts to archeological resources. With respect to historic resources, determining the specific number or type of property that may be negatively impacted is not feasible. Properties listed or Eligible for Listing on the National Register or on the City's Historic Property List, and properties located within Local Preservation Districts or designated as Local Protected sites will be protected from inappropriate alteration by existing zoning regulations. Potential impacts will be evaluated as projects resulting from the Ordinance are identified. Those designated resources requiring further evaluation by the SHPO under either the State or Federal preservation acts will be assessed prior to commencement of lead hazard mitigation.
Open Space and Recreation	No avoidance or mitigation measures are necessary
Traffic and Transportation	No avoidance or mitigation measures are necessary
Noise and Odor	No avoidance or mitigation measures are necessary
Documented Environmental Conditions	No avoidance or mitigation measures are necessary
Public Health and Safety	The Ordinance will help reduce lead exposure, and provide an improvement to an existing public health issue. Impacts that could arise during remediation activities will be avoided by the required use of lead safe work practices. Appropriate remediation based upon requirements established by the EPA will ensure the effectiveness of remediating lead hazards. As such, no additional mitigation measures are necessary.
Land Use and Zoning	No avoidance or mitigation measures are necessary

Topic	Proposed Avoidance/Mitigation Measures
Growth and Community Character	Potential mitigation measures that would serve to reduce the burden on property owners include such measures as making federal, state, and local funds available for lead-hazard control measures, aiding in the application for grant money to perform work, and providing additional guidance on the best ways to identify and control potential lead hazards.
Community Facilities and Services	No avoidance or mitigation measures are necessary

1.5 ALTERNATIVES

Alternative 1: Establish a lead ordinance that requires that the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and be correctly addressed by reducing and controlling lead-based paint hazards which may be present, in order to prevent human exposure to such hazards. The Ordinance will require inspections for lead paint hazards as part of the City's current inspection processes associated with rental units. Included in this alternative are the following components:

- Inspections for lead paint hazards will occur during the time for a City housing inspection triggered by a new or renewal certificate of compliance pursuant to Section 27-15 of the Property Conservation Code of the City of Syracuse, an application for a rental registry certificate pursuant to Section 27-131 of the Property Conservation Code of the City of Syracuse, or based upon the filing of a complaint. The inspection shall include a visual assessment for deteriorated paint and bare soil violations.

- Housing units will be exempt if they are already required to be safe from lead paint hazards under Federal law, or an Environmental Protection Agency (EPA) certified risk assessor deems the unit has no lead-based paint.

- The lead ordinance will assume the presence of lead-based paint in all properties built before 1978.

- Property owners will be required to repair areas of documented deteriorated paint and then pass a clearance inspection.

- Authorization of City officials to identify a “high risk” area. High risk areas will be based a number of factors including, but not limited to, Onondaga County Health Department inspections, and elevated lead blood-levels observed during New York State mandated testing. High-risk areas are subject to additional inspection and clearance requirements as compared to areas outside this designated area.

- Establish that all inspections, including those performed as part of an application for rental certificate or based on a complaint, should include a visual assessment for deteriorated paint and bare soil violations. If no interior deteriorated paint violations are identified during the visual assessment and the property is in the high-risk area, a dust-wipe sample must be taken to determine whether a lead-dust hazard exists.

- The Ordinance will detail procedures for how dust-wipe samples will be taken, establish standards for clearance examination by a third-party and associated reporting, and allow for city officials to undertake an audit of clearance examinations at the discretion of the Director of Code Enforcement.

- Establish violation standards and penalties.

Alternative 2: Establish a lead ordinance that requires that the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and be correctly addressed by reducing and controlling lead-based paint hazards which may be present, in order to prevent human exposure to such hazards. The Ordinance will require inspections for lead paint hazards as part of the City’s current rental unit inspection processes. As compared to Alternative #1, this alternative excludes designation of a ‘high risk” area and subsequent dust-wipe sample clearance protocols. Included in this alternative are the following components:

- Inspections for lead paint hazards will occur during the time for a City housing inspection triggered by a new or renewal certificate of compliance pursuant to Section 27-15 of the Property Conservation Code of the City of Syracuse, an application for a rental registry certificate pursuant to Section 27-131 of the Property Conservation Code of the City of

Syracuse, or based upon the filing of a complaint. The inspection shall include a visual assessment for deteriorated paint and bare soil violations.

- Housing units will be exempt if they are already required to be safe from lead paint hazards under Federal law, or an EPA certified risk assessor deems that the unit has no lead-based paint.

- The lead ordinance will assume the presence of lead-based paint in all properties built before 1978.

- Property owners will be required to repair areas of documented deteriorated paint and then pass a clearance inspection.

- Establish that all inspections, including those performed as part of an application for rental certificate or based on a complaint, should include a visual assessment for deteriorated paint and bare soil violations.

- The Ordinance will establish standards for clearance examination by a third-party and associated reporting, and allow for city officials to undertake an audit of clearance examinations at the discretion of the Director of Code Enforcement.

- Establish violation standards and penalties.

2.0 DESCRIPTION OF PROPOSED ACTION

The City of Syracuse (hereafter, "City") is proposing to amend its municipal property conservation code to provide the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. Specifically, the City is proposing adoption of the City of Syracuse Proposed Lead Ordinance (hereinafter referred to as "Ordinance"). The Ordinance is a Citywide regulation; a copy of the Draft Ordinance is provided as Appendix A. Information regarding the site, proposed action, the project's purpose, need, and benefit, construction and operation, and the anticipated reviews and approvals are provided below.

2.1 SITE DESCRIPTION

The City of Syracuse is located in Onondaga County in Central New York between Albany and Buffalo. The United States Census data indicates that the population, as of July 2018, is 142,749[15]. Founded in 1847, it is the seat of Onondaga County and the fifth largest city in the State of New York. It is the region's major employment center, home to businesses' headquarters, hospitals, and universities that attract people from throughout Central New York. Downtown Syracuse serves as the cultural and social center of the area, with restaurants, theaters, museums, sports arenas, and civic spaces. The city's neighborhoods are unique, vibrant places to live, with walkable business districts and access to the city's extensive park system and neighborhood schools.

The City occupies approximately 25 square miles. It is located along the south end of Onondaga Lake; major waterways noted in the City include the Barge Canal Terminal, Onondaga Creek, Harbor Brook, Ley Creek, and Meadow Brook. The City has an extensive park and recreation network that includes 896 acres of public parkland and open space[16].

The local area's transportation network includes an International Airport, the New York State Thruway and Barge Canal System, major interstates, rail terminals, and a national and regional bus system. The City maintains a traditional street grid network that contains 430 miles of local

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[15] United States Census Bureau. Quick Facts. Syracuse city, New York. Available at https://www.census.gov/quickfacts/syracusecitynewyork. Accessed November 5, 2019.

[16] City of Syracuse Comprehensive Plan 2040. Syracuse New York. Vision for a Sustainable Community, 2012 Plan Update. Available at: http://www.syrgov.net/PDFs/ReZoneSyracuse/Comp%20Plan%20amended%202013-08-14.pdf. 49 pages.

roadways; Interstate Routes 81 and 690 contain high-volume through traffic within the City[17]. In addition, the City maintains an extensive public safety network that consists of police, fire, and emergency medical services.

2.2 DETAILED DESCRIPTION OF THE PROPOSED ACTION

The City is proposing to amend its municipal property conservation code to provide the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The Ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures to be identified and correctly addressed. Recent studies indicate that 10.4% (498) of tested children under age 6 in the City of Syracuse have an elevated blood lead level (EBLL) greater than or equal to 5 μg/dL.[18] Notably, the 2018 count and percentage of children testing positive for EBLL are significantly lower than historic averages – this illustrates the degree to which issues of lead exposure have affected children and adult residents in the City of Syracuse for years with impacts experienced on a tremendous scale over the course of decades. More than 10% of City children have tested positive for EBLL in each year dating back to 2012. In addition, 87% of all children with EBLL in Onondaga County reside in the City[19], where nearly all single, two, and three-family structures were built before 1980.

The lead ordinance will authorize inspection by City of Syracuse personnel associated with Rental Registry and Certificate of Compliance. Housing units are exempt if they are already required to be safe from lead paint hazards under federal law, or an EPA-certified risk assessor deems the unit has no lead-based paint. Building owners are required to obtain a Rental Registry Certificate for each one-family and/or two-family non-owner occupied dwelling rented or leased within the City. As part of the inspection process required for registration, a lead visual assessment will be completed by the Division of Code Enforcement for pre-1978 structures. Rental Registry Certificates expire three years after issuance, and must be renewed. The lead visual assessment

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[17] City of Syracuse Comprehensive Plan 2040. Syracuse New York. Vision for a Sustainable Community, 2012 Plan Update. Available at: http://www.syrgov.net/PDFs/ReZoneSyracuse/Comp%20Plan%20amended%202013-08-14.pdf. 49 pages.

[18] Onondaga County Health Department. 2018 Annual Report. Published April 8, 2019. 43 pages. Available at http://www.ongov.net/health/documents/2018OCHDAnnualReport.pdf

[19] Onondaga County Health Department. 2018 Annual Report. Published April 8, 2019. 43 pages. Available at http://www.ongov.net/health/documents/2018OCHDAnnualReport.pdf

will be completed for renewals. The City of Syracuse issues Certificates of Compliance for three- , four-, and five-family rental properties. Lastly, a visual inspection will also occur as a result of a filing of a complaint. A lead visual assessment will be connected to issuance of Certificates of Compliance as well. Certificates of Compliance are also issued on a three-year period. The visual assessment includes a review of deteriorated paint and bare soil within the dripline of structures. In designated "high risk" areas, the visual assessments will also include dust wipe sampling.

In concert with HUD guidelines for designation of Neighborhood Revitalization Strategy Areas (NRSAs) and aligning with areas in which high rates of childhood EBLL have occurred, the City of Syracuse defines "high risk areas" in this Ordinance as those census tracts that fall within the NRSA boundaries (See Figure 1). The HUD approved NRSA was selected as meeting or exceeding the following four criteria:

1) At least 50% of housing built prior to 1978; and

2) At least 50% of households reside in rental property; and

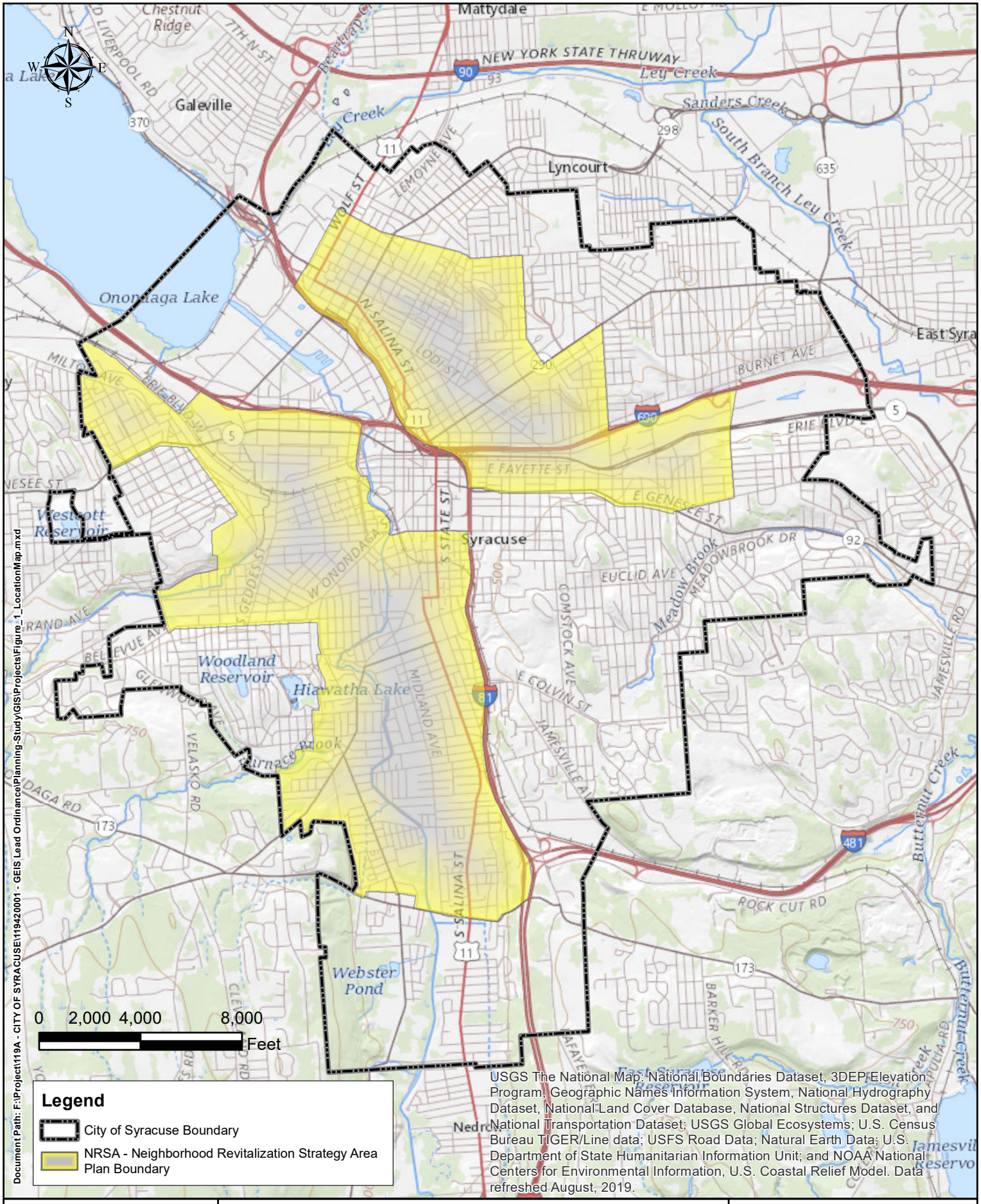
3) A significant amount of residents are living in poverty; and

4) At least 50% of the area is comprised of residents considered a minority population."

The NRSA, or "high risk" area, is shown in the attached Figure 1. A detailed description of the NRSA is provided in the City of Syracuse - Neighborhood Revitalization Strategy Area Plan dated May 2011 included as Appendix B.

Property owners will be required to repair areas of documented deteriorated paint and/or bare soil areas and then pass a clearance inspection. All deteriorated paint in pre-1978 housing is assumed to contain lead, unless additional testing at the owner's expense proves otherwise. Deteriorated paint must be fixed using defined Lead Safe Work Practices.

The means and methods for visual assessment, designation of "high risk" area, and dust wipe clearance requirements will be established by the City, and will evolve as appropriate as a result of future health testing results, unknown data/research findings, budgetary considerations, or other unforeseen matter.



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General Project Location Map
City of Syracuse Proposed Lead Ordinance
City of Syracuse, Onondaga County, New York

Figure 1

Table 3 provides an overview of existing City of Syracuse Rental Registry and Certificate of Compliance structures.

Table 3. City of Syracuse Rental Registry and Certificate of Compliance Structures

Item	Rental Registry (IPS /Reed Report)[20]				Certificate of Compliance (MPD from Oct 2019)[21]					
	One Family Rentals		Two Family Rental		Three-Family Rental		Four-Family Rental		Five-Family Rental	
	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later
Total Structures	4665	189	4065	48	666	7	446	10	127	1
Total Units	4665	189	8130	96	1998	21	1784	40	635	5
Total Structures in NRSA	2550	106	2395	23	442	5	318	7	78	1
Total Units in NRSA	2550	106	4790	46	1326	25	1272	28	390	5

2.3 PROJECT PURPOSE, NEED, AND BENEFITS

The need for a lead ordinance is based on the significant impact that lead exposure has on residents, especially children. The City of Syracuse Proposed Lead Ordinance's main objective is to reduce the rate of lead exposure in the City. New York State's policy framework for primary prevention to address lead hazards in housing before children are effected provides limited financial resources. Onondaga County is one of 15 counties meeting NYSDOH's criteria to be identified as a "community of concern", with the city of Syracuse containing five "high risk targeted zip codes"

[20] City of Syracuse, Integrated Property System (IPS). (2019). Rental Registry [Datafile]
[21] City of Syracuse, Integrated Property System (IPS). (2019). Rental Registry [Datafile]

serving as the basis for this designation. Onondaga County's current funding allocation does not support the capacity needed for a health department-driven comprehensive inspection and enforcement approach and relies on the limited enforcement scope outlined in public health law. Yet, the local allocation has benefited the community by supporting increased collaboration between city, county and community based organization efforts for targeting high risk areas, identifying gaps in enforcement capacity, sharing of parcel level data and more. New York State Department of Health (NYSDOH) requires lead testing for children at ages one and two and provides for educational and environmental interventions for children after they are identified with elevated EBLL; however, this program enacts measures after lead exposure occurs. The City of Syracuse proposed Ordinance defines methods to control lead hazards before exposure occurs.

The Center for Disease Control (CDC) has published information about the causes and effects of childhood EBLL. According to the CDC, lead can affect almost every organ and system in the body, especially the nervous system. It can cause learning disabilities and behavioral problems. At very high levels, it can cause seizures, coma, and even death. Children are more vulnerable to lead than adults; and according to the CDC, the first 6 years of life are critical as this time is when the brain grows the fastest[22].

Lead is a potent chemical element that can cause major health problems upon exposure. Lead enters the body through inhalation, absorption, and ingestion, all of which can lead to health risks. Upon contact, lead is absorbed into bones, blood, and tissue, where it is temporarily stored and continuously exposes the body to contamination[23]. Contamination can effect almost every organ and system in the human body, with particular risk to the nervous system[24]. Prolonged exposure to lead allows it to accumulate in the body, leading to the build-up of harmful contamination that can have both short- and long-term effects. A person may experience short-term effects of lead contamination when they are exposed to high levels of lead in a small period of time. Short-term effects include fatigue, headaches, memory loss, and tiredness. However, more severe symptoms

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[22] Center for Disease Control. Childhood Lead Poisoning. Available at https://ephtracking.cdc.gov/showLeadPoisoningEnv. Accessed December 2, 2019.

[23] Gulson, B. L., Mahaffey, K. R., Mizon, K. J., Korsch, M. J., Cameron, M. A., & Vimpani, G. (1995). Contribution of tissue lead to blood lead in adult female subjects based on stable lead isotope methods. The Journal of laboratory and clinical medicine, 125(6), 703-712.

[24] Center for Disease Control and Prevention. (2018). Lead, Information for workers, health problems caused by lead. *National Institute for Occupational Safety and Health.*

to extremely high levels can include anemia, weakness, kidney and brain damage, and in some extreme cases, even death[25]. Long-term effects of lead exposure, which take place over the course of several years, can occur at a dosage of as little as 5 μg/dL[26], and can cause nausea, depression, constipation, and abdominal pain. More severe effects from prolonged exposure include high blood pressure, heart and kidney disease, and reduced fertility. It is also suspected by the Department of Health and Human Services, Environmental Protection Agency, and International Agency for Research on Cancer that prolonged exposure to lead can be a major cause of cancer. More subtle effects, which often go un-diagnosed as a product of lead-contamination, include cognitive and neurological defects, congenital malformations, and inhibited growth and development[27].

Children are especially susceptible to lead contamination, particularly children under six years old, because their bodies absorb lead 4-5 times faster than adults, leading to a magnification of contamination effects[28]. The rapid cognitive and physical development of children and infants also increases their risk to lead exposure, and can lead to lifelong harm. Cognitive development can be impeded by lead exposure, leading to the development of neurological conditions such as altered neuromotor and neurosensory function, hearing loss, and learning and behavioral abnormalities[29]. Physical damages to lead contamination include seizures, comas, immunotoxicity, and in severe cases, death. Unlike lead exposure in adults, which may be reversible, contamination in children often causes permanent damage with lifelong repercussions[30]. The most common damage has been seen at exposures between 5 and 50 μg/dL, however, there is no known threshold to safe lead exposure, as any amount is known to cause serious and permanent harm[31].

The New England Journal of Medicine has published several studies concerning lead exposure affects on a child's IQ score. In the "*Intellectual Impairments in Children with Blood Lead*

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[25] Center for Disease Control and Prevention. (2018). Lead, Information for workers, health problems caused by lead. *National Institute for Occupational Safety and Health.*

[26] United States Department of Health and Human Services. (2019). Toxicological profile for lead. *Agency for Toxic Substances and Disease Registry*.

[27] Goyer, R. A. (1990). Lead toxicity: from overt to subclinical health effects. *Environmental Health Perspectives*.

[28] World Health Organization. (2019). Lead poisoning and health. *World Health Organization News Room.*

[29] World Health Organization. (2019). Lead poisoning and health. *World Health Organization News Room.*

[30] Center for Disease Control and Prevention. (2020.) Childhood lead poisoning prevention, health effects of lead exposure. U.S. Department of Health & Human Services.

[31] United States Department of Health and Human Services. (2019). Toxicological profile for lead. *Agency for Toxic Substances and Disease Registry*.

Concentrations below 10µg per Deciliter", Canfield et. al. concludes that blood level concentrations, even those below 10µg per deciliter, are inversely associated with children's IQ scores[32].

In addition, Professor Katrina Smith Korfmacher of the University of Rochester has studied the issue of lead poisoning and its impact on economic achievement, and provides a summary of her analysis in the *Long-term costs of lead poisoning: How much can New York save by stopping lead?* dated July 9, 2003. This study reveals significant costs associated with lead beyond health care including income loss, educational impacts, costs to the criminal justice system, and other societal costs[33].

2.4 REVIEWS, APROVALS, AND OTHER COMPLIANCE DETERMINATIONS

In addition to the Lead Agency's responsibility to comply with State Environmental Quality Review Act (SEQR) regulations and requirements, implementation of the Project will take place following funding procurement and certain ministerial approvals from local and state agencies. The approvals that are expected to be required are listed in Table 4.

Table 4. Approvals for the Ordinance

Agency	SEQR Status	Description of Approval Required or Project Interest
City of Syracuse	Lead Agency	Administration of SEQR review process, including acceptance of GEIS documents and issuance of findings
Onondaga County Department of Health	Interested Agency	Administer Lead Poisoning Prevention Program
New York State Department of Environmental Conservation	Interested Agency	Oversee SEQR regulation
New York State Department of Health	Interested Agency	Administer Lead Poisoning Prevention and Control regulation

[32] Canfield et. al. 2003. *Intellectual Impairment in Children with Blood Lead Concentrations below 10µ per Deciliter*. New England Journal of Medicine.

[33] Kormacher, Katrina Smith, PhD. *Long-term costs of lead poisoning: How much can New York save by stopping lead?*. July 9, 2003. 11 pages.

Agency	SEQR Status	Description of Approval Required or Project Interest
New York State Office of Parks, Recreation, and Historical Preservation	Interested Agency	Consultation pursuant to NY, Parks, Recreation and Historic Restoration Law (PRHPL) § 14.09 and/or § 106 of the National Historic Preservation Act
U.S. EPA	NA	Administer Renovation, Repair, & Painting Program (RRP) Administer Abatement and Evaluation Program

2.4.1 *SEQR Process*

The basic purpose of SEQR is to incorporate the consideration of environmental factors into the existing planning, review, and decision-making processes of state, regional, and local government agencies at the earliest possible time. To accomplish this goal, SEQR requires a determination of whether a proposed action may have a significant impact on the environment, and if it is determined that the action may have a significant adverse impact, prepare or request an Environmental Impact Statement (EIS).[34] It was the intention of the State Legislature that protection and enhancement of the environment, human, and community resources should be given appropriate weight with social and economic considerations in determining public policy, and that those factors be considered together in reaching decisions on proposed actions. Accordingly, it is intended that a suitable balance of social, economic, and environmental factors be incorporated into the planning and decision-making processes of state, regional, and local agencies. However, it is not the intention of SEQR that environmental factors be the sole consideration in decision-making.[35]

The SEQR process for the Ordinance has included or will include the following actions:

- Preparation of Parts 1, 2, and 3 of a Full Environmental Assessment Form (EAF).
- Issuance of a Positive Declaration.
- Preparation of a Draft Scoping Document.

[34] 6 New York Codes, Rules, and Regulations (NYCRR) Part 617.1(c). 6 NYCRR Part 617.1 through 617.20 can be accessed at www.dec.ny.gov/regs/4490.html.
[35] 6 NYCRR Part 617.1(d).

- Public Scoping Process.
- Issuance of Final Scoping Document.
- Preparation of the Draft Environmental Impact Statement (DGEIS).
- Notice of completion of DGEIS and notice of public information meeting.
- Public information meeting on DGEIS.
- A minimum 30-day public comment period on the DGEIS.
- Revisions to the DGEIS as necessary to address substantive/relevant comments received.
- Preparation of Final EIS (FGEIS).
- File notice of completion of FGEIS.
- 10-day consideration period.
- Issuance of Findings Statement.

On May 31, 2019, the City circulated to potentially interested/involved SEQR agencies Part 1 of a Full Environmental Assessment Form (EAF) and a statement indicating that they intended to serve as Lead Agency for the review of the proposed Ordinance. Following the required 30 day coordinated review period,[36] no agency objected to the City of Syracuse assuming the role of Lead Agency. Copies of agency correspondence are provided in Appendix B. In addition, the City of Syracuse, as Lead Agency, issued a Positive Declaration (which necessitated the preparation of the DGEIS), and initiated the Public Scoping Process.

Public scoping represents an initial step in the review of potential environmental impacts under SEQR. The primary goals of scoping (which is an optional step in the SEQR process) are to focus an EIS on potentially significant impacts and to eliminate consideration of those impacts that are irrelevant or non-significant.[37] A draft scoping document for the proposed Ordinance was released for public and agency review and comment on October 30, 2019. The comment period provided an opportunity for agencies and the public to review and comment on the identification of significant environmental conditions and resources that may be affected by the proposed action,

[36] 6 NYCRR Part 617.6(b)(3)(i).
[37] 6 NYCRR Part 617.8(a).

and the extent and quality of information necessary to address those issues during the SEQR process. The comment period ended on November 15, 2019. No comments were received. A final scoping document was issued December 17, 2019, which identified the significant environmental conditions and resources that may be affected by the proposed Ordinance, and defined the extent and quality of information necessary to address those issues. It reflected the Lead Agency's analysis of potential impacts indicated in Parts 2 and 3 of the EAF.

In accordance with SEQR, the DGEIS addressed those potentially significant adverse environmental impacts that can reasonably be anticipated and/or have been identified in the scoping process. A GEIS should not contain more detail than is appropriate considering the nature and magnitude of the proposed action and the significance of its potential impacts. The GEIS must be analytical and not encyclopedic.[38]

The FGEIS was prepared following public review and comment on the DGEIS, as described below.

2.4.2 *Agency and Public Review*

Opportunities for detailed agency and public review in relation to this specific action have been provided throughout the SEQR process. The DGEIS, along with a copy of the public notice, were made available for review and comment to the public and involved/interested agencies. In addition to a public comment period running from February 5, 2020 through March 5, 2020 (during which time written comments were accepted), a public information meeting concerning the DGEIS was held on February 12, 2020. All public comments received during the public comment period and public information meeting, along with responses, are provided in Appendix E to the FGEIS.

Additionally, SEQR regulations require EISs be posted on a publicly accessible internet website. The DGEIS has previously been posted and will remain posted until the FGEIS is accepted, at which point the FGEIS will be posted until one (1) year after all final approvals have been issued for the Project that is the subject of the FGEIS. In accordance with this amendment to SEQR, the FGEIS will be posted to:

http://www.syrgov.net/Neighborhood_and_Business_Development.aspx.

[38] 6 NYCRR Part 617.9

The Recipients of this FGEIS (in either digital or printed format) are as follows:

Dr. Indu Gupta, MD, MPH
Commissioner of Health
John H. Mulroy Civic Center
421 Montgomery Street
Syracuse, New York 13202

Mr. Travis Glazier
Onondaga County Office of the Environment
John H. Mulroy Civic Center
421 Montgomery Street, 14th Floor
Syracuse, New York 13202

Dr. Howard Zucker, M.D., J.D.
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, New York 12237

Mr. David Bimber
Regional Permit Administrator
NYSDEC Region 7
615 Erie Blvd. West, Room 206
Syracuse, New York 13204-2400

Ms. Ruth Pierpont, Deputy Commissioner for Historic Preservation/Deputy SHPO
New York State Division for Historic Preservation
Peebles Island State Park
P.O. Box 189
Waterford, New York 12188-0189
(Consultation via on-line submission)

Ms. Vickie Pane
U.S. EPA Region 2
MS-225
2890 Woodbridge Ave.
Edison, New Jersey 08837-3679

3.0 EXISTING CONDITIONS, POTENTIAL IMPACTS, AND MITIGATION MEASURES

3.1 HISTORIC, CULTURAL, AND ARCHEOLOGICAL RESOURCES

3.1.1 *Existing Conditions*

The City of Syracuse features hundreds of historic properties that are listed in the National Register of Historic Places either individually or as part of one of the City's 15 historic districts. In addition, there are hundreds more architectural and cultural resources located in the City that are eligible for listing in the National Register. Because lead mitigation activities may have an adverse impact on historic resources, the City has entered into consultation with the State Historic Preservation Office (SHPO) and the Syracuse Landmark Preservation Board (SLPB) in order to reduce or avoid significant adverse impacts to historic and cultural resources. Consultation and/or correspondence related to historic, cultural, and archaeological resources is included in Appendix C.

3.1.1.1 Archeological Resources

The SHPO maintains an inventory of archeological sites throughout New York State. According to the SHPO, most sites are found in relatively shallow deposits (1 to 2 feet below grade); however, is some instances natural factors (i.e. sedimentation in floodplains) can bury sites deeper below grade (SHPO, 2019)[39]. Archeological sites can date to 12,000 years ago. Pre-European range from temporary fishing encampments to permanent villages. Post-European sites include everything from Native American and early European settlements to twentieth century Cold War military installations (SHPO, 2019)[40]. These resources provide invaluable information with regard to human history.

[39] SHPO, 2019. Parks, Recreation, and Historic Preservation – Public Access. Available at https://parks.ny.gov/shpo/archeology/ (Accessed November 25, 2019)

[40] SHPO, 2019. Parks, Recreation, and Historic Preservation – Public Access. Available at https://parks.ny.gov/shpo/archeology/ (Accessed November 25, 2019)

According to the NYSOPRHP online Cultural Resource Information System (CRIS) database (CRIS, 2019;[41] Image 1-2), multiple areas within the City are identified as archeologically sensitive.

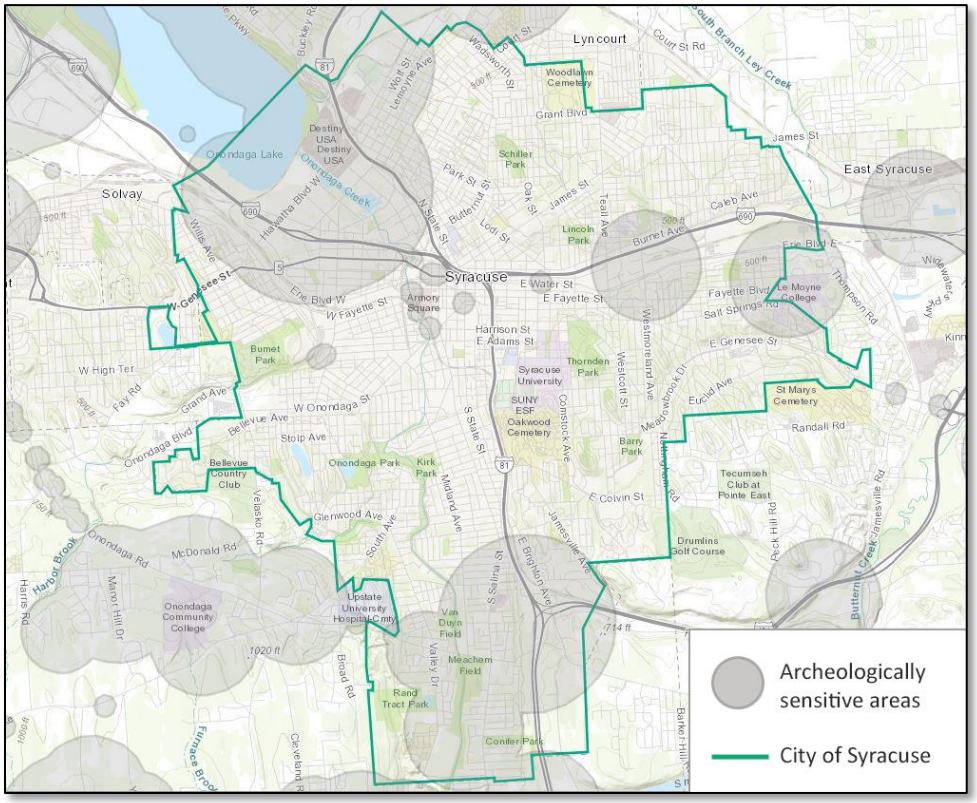

Image 1-1: Screen Capture from CRIS Database

Showing Archeologically Sensitive Areas within the City of Syracuse (CRIS, 2019).

3.1.1.2 Historic and Architectural Resources

The National Register of Historic Places (NRHP) is reviewed to identify historic properties that are listed in, or have previously been determined eligible for listing in, the NRHP within the City. According to CRIS, there are 111 NRHP-listed properties that occur in the City limits. In addition, a search of the CRIS database indicates that there are hundreds of buildings considered potentially eligible for listing. National Register properties are listed in Table 5.

[41] CRIS, 2019. *Cultural Resource Information System – Public Access*. Available at: https://cris.parks.ny.gov/Default.aspx (Accessed November 25, 2019).

Table 5. National Register Buildings.

Building Name	SHPO Site Number
Syracuse Savings Bank	90PR02867
Onondaga County Savings Bank Building	90PR02898
Gere Bank Building	90PR02932
Weighlock Building	90PR02939
Spencer Residence	96PR03179
Hoeffer Residence	96PR03180
Fairchild Residence	96PR03181
Poehlman Residence	96PR03182
Chapman Residence	96PR03183
Kelly Residence	96PR03184
Ward House	96PR03185
Gang Residence	96PR03186
Estabrook House	96PR03187
Collins Residence	96PR03188
Edwards, O. M., Building	00PR05699
Mills, Harriet May, Residence	01PR06022
Simmons, Alton, Residence	01PR06028
Porter Residence	96PR03227
Gillett, William J., House	90PR03573
Gridley, John, House	90PR03578
Blanchard Residence	96PR03228
Sanford Residence	96PR03229
Syracuse University-Comstock Tract Buildings	90PR03592
St. Paul's Cathedral and Parish House	90PR03594
Central Technical High School	90PR03604

Building Name	SHPO Site Number
Loew's State Theater	90PR03608
Sherbrook Apartments	96PR03230
Clark House	96PR03231
King, Polaski, House	90PR03621
Amos Block	90PR03625
Dunfee Residence	96PR03233
Plymouth Congregational Church	97PR03254
Onondaga Park	01PR06040
First English Lutheran Church	97PR03287
Syracuse Post Office and Court House	91PR02538
Crouse College, Syracuse University	90PR04739
White Residence	96PR03301
Ashton Residence	96PR03302
Grace Episcopal Church	90PR04755
Third National Bank	90PR04760
Hunziker Residence	96PR03303
Syracuse City Hall	90PR04767
A.F. Sanderson Residence	96PR03304
White, Hamilton, House	90PR04775
Welsh Residence	96PR03305
Fuller Residence	96PR03306
White Memorial Building	90PR04794
Ziegler Residence	96PR03307
Hall of Languages, Syracuse University	90PR04804
Sanderson Residence	96PR03308
Central New York Telephone and Telegraph Building	90PR04812

Building Name	SHPO Site Number
Garrett Residence	96PR03309
Stowell Residence	96PR03310
Teall, Oliver, House	90PR04833
Onondaga County War Memorial	90PR05042
Brown, Alexander, House	90PR05063
Stickley, Gustav, House	90PR05085
Walnut Park Historic District	90PR05104
Pi Chapter House of Psi Upsilon Fraternity	90PR05119
New York Central Railroad Station Complex	94PR02791
Thornden Park	90PR05464
Oakwood Cemetery	90PR05703
Babcock-Shattuck House (Former Jewish War Veterans Home)	03PR06082
Elmwood Park	04PR06625
Snow, C. W., Warehouse	06PR07089
Burhans, Harry N., House	07PR06883
Hotel Syracuse	07PR06977
Temple Society of Concord	08PR06640
Louis Skoler Residence	08PR06706
Louis Will Residence	09PR06756
C.G. Meaker Food Company Warehouse	09PR06757
William H. Sabine House	09PR06827
Niagara Hudson (Niagara Mohawk) Building	09PR06850
Barnes-Hiscock House (Corinthian Club)	10PR08151
Saint Paul's Armenian Apostolic Church (Park Avenue Methodist Church)	10PR08152
John G. Ayling House	10PR08209
Huntley Apartments	11PR08037

Building Name	SHPO Site Number
New Kasson Apartments	11PR08065
People's African Methodist Episcopal Zion Church	11PR08067
Leavenworth Apartments	11PR08068
St. Patrick's Church Complex	12PR05431
Trinity Episcopal Church	13PR05799
Bellevue Country Club	13PR05839
Odd Fellows Lodge and Temple	13PR05840
The Courier Building	13PR05841
West Brothers Knitting Co.	14PR03702
Syracuse Lighting Co	16PR05404
Oak Knitting Mill	16PR05406
Morgan Dunne House	16PR06417
South Presbyterian Church	16PR07386
Sagamore Apartment House, 664-666 West Onondaga Street, Syracuse	17PR02936
Lipe Rollway Corporation nomination	17PR06910
R.E. Dietz Company Factory	18PR02548
Whedon-Schumacher House, Syracuse	19PR00850

According to the NYSOPRHP online Cultural Resource Information System (CRIS) database (CRIS, 2019;[42] Image 1-2), there are multiple historic districts in the City as well.

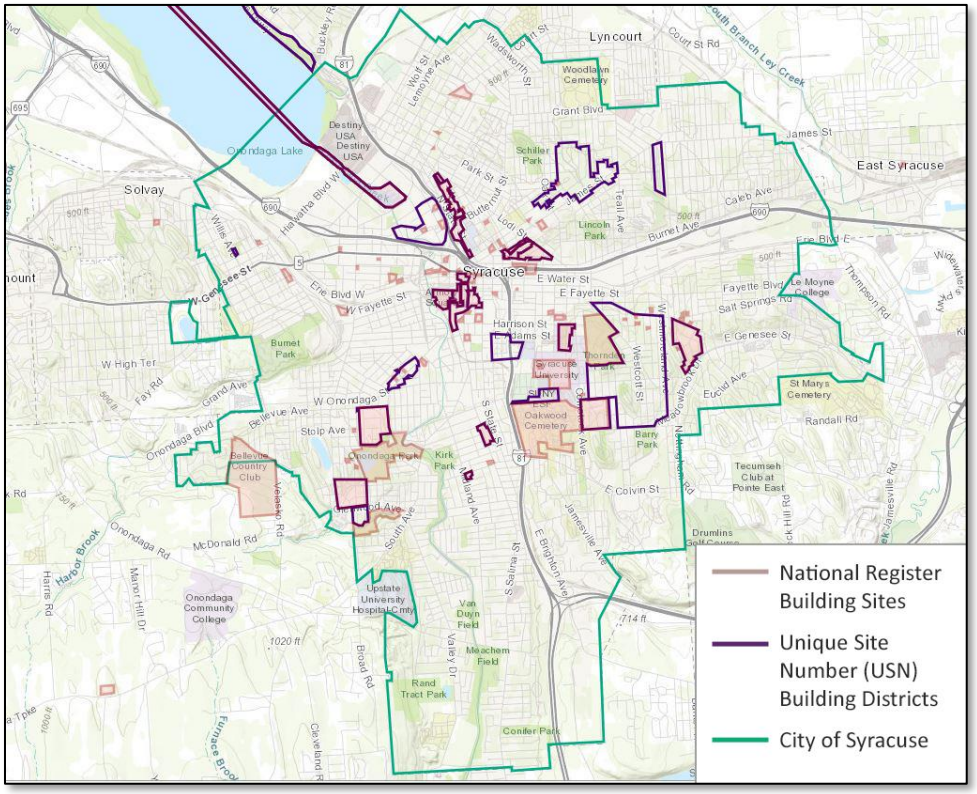

Image 1-2: Screen Capture from CRIS Database

Showing Historic Resources within the City of Syracuse (CRIS, 2019).

National Register districts are listed in Table 6.

Table 6. National Register Districts.

Historic District Name	SHPO Site Number
Hawley-Green Street Historic District	90PR03561
Montgomery Street-Columbus Circle Historic District	90PR03640
Berkeley Park Subdivision Historic District	01PR06041
Hanover Square Historic District	90PR04825
Armory Square Historic District	90PR05022

[42] CRIS, 2019. *Cultural Resource Information System – Public Access*. Available at: https://cris.parks.ny.gov/Default.aspx (Accessed November 25, 2019).

Historic District Name	SHPO Site Number
North Salina Street Historic District	90PR05045
South Salina Street Historic District	90PR05083
Walnut Park Historic District	90PR05104
Strathmore 'By the Park' Historic District	04PR06727
South Salina Street Downtown Historic District	08PR06639
Onondaga Highlands-Swaneola Heights Historic District	09PR06851
Scottholm Tract Historic District	11PR08129
South Salina Street Downtown Historic District (boundary increase)	13PR05825
Hanover Square Historic District Expansion	14PR03693
North Salina Street Historic District Boundary Increase	15PR06893
Hawley-Green Street Historic District Boundary Expansion	15PR06895
St. Anthony of Padua Roman Catholic Church Complex	17PR06808
St. Anthony Convent & School	18PR05072

The City identifies additional significant historical resources within its boundary known as Local Preservation Districts and Local Protected Sites. Local Preservation Districts are as follow:

- Sedgwick/Highland/James Preservation District
- Berkeley Park Historic District
- Columbus Circle Preservation District
- Hanover Square Preservation District

The list of Local Protected Sites are provided as Appendix C.

3.1.2 ***Potential Impacts***

3.1.2.1 Archeological Resources

Remediation activities under both Alternative 1 and 2 may result in the need for soil removal, and/or capping around the dripline of structures to remove/remediate lead contaminated soil. The need for soil disturbance will be based on site-specific conditions. It is not anticipated that large

quantities of earthwork will be necessary at each site. Soils within the immediate vicinity of structures would have been disturbed during foundation construction, and therefore, no intact archeological resources would occur in these areas. As such, the proposed project will not result in impacts to archeological resources.

3.1.2.2 Historic and Architectural Resources

The City of Syracuse has a significant number of historically significant structures and districts. There is the potential for a significant impact on architectural and historic resources as a result of the proposed alternatives. It is assumed that the alternatives will require similar remediation activities, and therefore the potential to impact historic and architectural resources is the same for both alternatives. This is dependent upon future lead mitigation scope of work at the various structures.

The proposed Ordinance addresses lead in residential housing; mandated work on these structures may have an effect upon historic architectural resources of the area. The Ordinance does not mandate physical alteration to historic structures; however, physical alterations (i.e. windows, porches, doors) to the exterior and interior of historic structures may occur.

Determining the specific number or type of property that may be negatively impacted is not feasible. Properties listed or Eligible for Listing on the National Register or on the City's Historic Property List, and properties located within Local Preservation Districts or designated as Local Protected sites will be protected from inappropriate alteration by existing zoning regulations. In addition, the City of Syracuse recognizes the importance of preserving sensitive historic resources. Potential impacts will be evaluated as projects resulting from the Ordinance are identified. Those designated resources requiring further evaluation by the SHPO under either the State or Federal preservation acts will be assessed prior to commencement of lead hazard mitigation.

3.1.3 *No Action Alternative*

Under the No-Action alternative, no impacts to historic or cultural resources will occur.

3.1.4 *Proposed Mitigation*

The proposed Ordinance, in combination with existing City and SHPO regulations, incorporates measures to avoid significant impacts to identified historic or archeological resources. Consequently, no mitigation measures regarding these resources are proposed.

3.2 PUBLIC HEALTH AND SAFETY

3.2.1 *Background Information*

Human health implications are at the forefront of this proposal; the Ordinance's main objective is to improve health within the City as it pertains to lead hazards. The finalization of the Ordinance must consider the following:

- Protect renters from lead hazards, including during remediation activities
- Create safe work practices for lead-based paint disturbance

Identify clearance examination standards for determining success or failure of controls and/or remediation work.

3.2.2 *Fire Protection*

Fire protection for the site is provided through the City of Syracuse Department of Fire. The Fire Department provides fire protection and prevention services throughout the City including for four major hospitals, many downtown office buildings, Hancock International Airport, Interstates 81 and 690, as well as Syracuse University and the Carrier Dome. Currently over 350 firefighters staff the department and answer over 21,000 alarms a year of which over 1,000 are fires[43]. The Syracuse Fire Department holds an ISO class 1 rating. Nationally there are 241 ISO Class 1 Departments. Syracuse is one of only five in New York State with this rating.

In addition to fire protection and prevention services, the Syracuse Fire Department provides:

- Emergency Medical Services
- Basic Life Support First Response
- Advanced Life Support First Response
- Advanced Life Support Ambulance
- Statewide Disaster Response
- Technical Rescue
- Automobile Extraction

[43] City of Syracuse Department of Fire. Available at http://www.syracuse.ny.us/Fire_Department.aspx. Accessed December 2, 2019.

- Elevator Rescue
- Confined Space Rescue
- Collapse Rescue
- Trench Rescue
- Hazardous Materials Incident Response
- Statewide Disaster Response

3.2.3 *Police Protection*

The City of Syracuse Police Department, located at 511 South State Street, Syracuse, currently maintains more than 425 members[44]. They are responsible for providing public safety services in the City. The City is divided in three districts: north, southeast, and southwest. The north district covers Eastwood, Sedgwick, the North Side, much of Tipperary Hill and the Inner Harbor Area[45]. The southeast district includes downtown, Syracuse University, Meadowbrook and the south side (south of Colvin Street)[46]. The southwest district includes Strathmore, parts of the Valley, the Near Westside and parts of the south side west of Interstate I-81[47].

3.2.4 *Emergency Services*

The Onondaga County Departments of Emergency Communications and Emergency Management are designated to coordinate all emergency management activities in the area and work cooperatively with emergency medical services (EMS), fire, hospital, and law enforcement agencies to provide incident response to the community. The Department of Emergency Communications operates the County's 911 Call Center and provides the main link between the citizens and the public safety agencies that serve them. When an emergency call arrives that

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[44] Syracuse Police Department. Available at https://www.syracusepolice.org/listing.asp?orgId=114&parent=114. Accessed on December 2, 2019.

[45] Syracuse.com. Available at https://www.syracuse.com/crime/2019/05/syracuse-police-divide-city-into-three-patrol-zones.html. Accessed on December 2, 1019.

[46] Syracuse.com. Available at https://www.syracuse.com/crime/2019/05/syracuse-police-divide-city-into-three-patrol-zones.html. Accessed on December 2, 1019.

[47] Syracuse.com. Available at https://www.syracuse.com/crime/2019/05/syracuse-police-divide-city-into-three-patrol-zones.html. Accessed on December 2, 1019.

requires a dispatched response, the call center coordinates with the appropriate responders based upon location and availability. This agency currently serves the entire City of Syracuse.

3.2.5 *Environmental Conditions*

Children are exposed to lead in a variety of ways. A study was undertaken in 2002 to determine the relative contribution of residential lead hazards in children lead concentrations. The study found that the major source of elevated blood lead levels in children is lead-contaminated dust found in the home[48]. Lead-based paint that was used in homes prior to 1978 is considered the major source of lead poisoning; lead hazards occur from peeling, chipping, cracked or otherwise deteriorated paint. Painted surfaces such as windows, doors, stairs, railings, banisters, and porches are major sources of lead-contaminated dust. Contaminated dust is typically generated by friction or impact with surfaces where paint is deteriorated. Lead dust and chips can also form when dry paint is scraped and sanded. These and other construction activities can cause the lead-contaminated dust to become airborne, increasing potential exposure to lead. Lead in the soil around the home is also a possible source of exposure and can derive from the exterior use of lead-based paint [49].

The Center for Disease Control (CDC) has published information about the causes and effects of childhood lead poisoning. According to the CDC, lead can affect almost every organ and system in the body, especially the nervous system. It can cause learning disabilities and behavioral problems. At very high levels, it can cause seizures, coma, and even death. Children are more vulnerable to lead than adults; and according to the CDC, the first 6 years of life are critical as this time is when the brain grows the fastest[50].

The New England Journal of Medicine has published several studies concerning lead poisoning affects on a child's IQ score. In the "*Intellectual Impairments in Children with Blood Lead*

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[48] Lanphear et. al.. Environmental lead exposure during early childhood. The Journal of Pediatrics. Volume 140, Number 1. January 2002. 47 pages.

[49] Ecology and Environment. Final Generic Environmental Impact Statement to Assess Lead Poisoning Prevention Ordinance Alternatives for the City of Rochester, New York. 2005. 359 Pages.

[50] Center for Disease Control. Childhood Lead Poisoning. Available at https://ephtracking.cdc.gov/showLeadPoisoningEnv. Accessed December 2, 2019.

Concentrations below 10µg per Deciliter", Canfield et. al. concludes that blood level concentrations, even those below 10 µg/dL, are inversely associated with children's IQ scores[51].

Once lead poisoning has been identified, two options to address the problem are typically considered. The most common option is to remove the child from the lead source, and or mitigate the lead hazard, so that the likelihood of further exposure is reduced. Chelation therapy is the administration of a drug that draws toxic metals from the bloodstream so that the body can pass them more effectively[52]. According to the Mayo Clinic, chelation therapy is typically conducted in situations where high blood lead concentrations are observed at levels greater 45µg/dL or higher[53].

Lead poisoning in the City is a significant concern as documented by public health tests. In 2018, Onondaga County Health Department testing indicates that 10.7% (446) of tested children under age 6 in the City of Syracuse have EBLL greater than or equal to 5 µg/dL.[54] In addition, 87% of all children with EBLL in Onondaga County reside in the City.[55]

3.2.6 ***Potential Impacts***

The Ordinance's main objective is to reduce the rate of lead exposure in the City given the significant impact that lead exposure has on residents, especially children. The City of Rochester implemented a similar rule in 2006. In November of 2008, the City issued a summary of the ordinance's effect entitled *An Evaluation of the City of Rochester's Lead Law: 2006-2008* prepared by the Center for Governmental Research (CGR) dated November 2008 (hereinafter referred to as "CGR Report"). According to the City of Rochester, from 2006 to 2008 the proportion of children under the age of six that had elevated blood levels dropped by 2.5% as compared to those numbers

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[51] Canfield et. al. 2003. Intellectual Impairment in Children with Blood Lead Concentrations below 10µ per Deciliter. New England Journal of Medicine.

[52] Ecology and Environment. Final Generic Environmental Impact Statement to Assess Lead Poisoning Prevention Ordinance Alternatives for the City of Rochester, New York. 2005. 359 Pages.

[53] Mayo Clinic. Lead Poisoning. Available at https://www.mayoclinic.org/diseases-conditions/lead-poisoning/diagnosis-treatment/drc-20354723. Accessed December 3, 2019.

[54] Onondaga County Health Department. 2018 Annual Report. Published April 8, 2019. 43 pages. Available at http://www.ongov.net/health/documents/2018OCHDAnnualReport.pdf

[55] Onondaga County Health Department. 2018 Annual Report. Published April 8, 2019. 43 pages. Available at http://www.ongov.net/health/documents/2018OCHDAnnualReport.pdf

two years prior to implementation[56]. The implementation of the Ordinance will require property owners remediate lead hazards that will result in significant benefits in the long term.

Lead remediation activities could result in an increase in potential lead exposure if not performed according to safety standards. Ineffective lead remediation could potentially create an inadvertent release of lead contaminated dust into the air, spreading lead contaminated dust to other areas of a structure as a result of improper cleaning, or creating fumes containing lead. Use of lead safe work practices, appropriate lead hazard control methods, and proper maintenance will reduce the likelihood that lead remediation activities will create unnecessary exposure. Under Alternative 1, lead wipe sampling will occur in those areas defined as "high risk". Lead dust wipe sampling is a more comprehensive inspection as compared to visual inspection alone. Dust wipe sampling can identify small particles of lead contaminated dust not visible to the naked eye. A person with normal eyesight cannot detect individual dust particles smaller than 50 micrometers (μm) in diameter.[57] Data indicate that a significant percentage of the dust generated during lead hazard control work is smaller than 50 μm.[58] Clearance using dust wipes provides a more definitive conclusion that the hazard has been removed, and therefore Alternative 1 provides a more comprehensive plan for reducing lead exposure as compared to Alternative 2.

3.2.6.1 Lead Safe Work Practices

Contractors doing work for compensation in homes or child-occupied facilities built before 1978 must be certified and follow established work practices. Lead hazard removal must be completed consistent with Lead Work Safe Practices. Lead Work Safe Practices are described in the Code of Federal Regulation (CFR) Title 40: Protection of Environment, Part 745 – Lead-based Paint Poisoning Prevention in Certain Residential Structures. This ensures renovations are performed by certified firms and personnel. Appropriate work practices also include warning signs and work area containment, and restriction of certain construction methods (e.g., high heat gun, torch, power sanding, etc.). In addition, there are requirements for the appropriate waste handling, cleaning, and

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[56] Boyce et. al. Center for Governmental Research. An Evaluation of the City of Rochester's Lead Law: 2006-2008. Dated November 2008. 75 pages.

[57] Olishifsky, 1983. Olishifsky, J. Fundamentals of Industrial Hygiene, National Safety Council, Chicago, Illinois

[58] Mamane, 1994. Mamane, Y., R. Willis, R. Stevens, R. Miller, and K. Blume, "Scanning Electron Microscopy/X-Ray Fluorescence Characterization of Post Abatement Dust," Lead in Paint, Soil and Dust: Health Risks, Exposure Studies, Control Measures, Measurement Methods, and Quality Assurance, ASTM STP 1226, eds

post-renovation cleaning verification. Consistency with 40 CFR 745 will reduce the potential for release of lead containing materials during lead remediation activities.

3.2.6.2 Lead Hazard Controls

The following methods will be used to remediate lead hazards.

3.2.6.2.1 Lead Hazard Reduction

There are several options for Lead Hazard Reduction that fall under the categories of abatement and interim controls as defined in Title 24. Housing and Urban Development, Part 35 – Lead-based Paint Poisoning Prevention in Certain Residential Structures, subpart R – Methods and Standards for Lead-paint Hazard Evaluation and Hazard Reduction Activities, Section 35.1330 – Interim Controls (24 CFR 35.1330) and Section 35.1325 - Abatement (24 CFR 35.1325). Abatement is designed to permanently eliminate lead-based paint or lead-based paint hazards (whereas permanent is defined as 20-year expected life). Interim controls are reduction activities that temporarily reduce exposure via repair, painting, maintenance, special cleaning, occupant-protection measures, clearance, and education programs. Both lead hazard reduction methods are described below.

3.2.6.2.1.1 Abatement

Abatement is performed by EPA accredited abatement workers supervised by an EPA accredited supervisor. Abatement methods include:

- Removing lead-based paint and its dust,
- Permanently encapsulating or enclosing the lead-based paint,
- Replacing components containing lead-based paint, and
- Removing or permanently covering lead-contaminated soil.

3.2.6.2.1.2 Interim controls

Interim controls are Lead Hazard Reduction activities that temporarily reduce exposure to lead-based paint hazards through repairs, painting, maintenance, special cleaning, occupant-protection measures, clearance, and education programs. A person performing paint stabilization, interim controls, or standard treatments must be trained in accordance with OSHA Hazard Communication

requirements (29 CPR 1926.59) and must be supervised by a certified lead-based paint abatement supervisor, or must have successfully completed a HUD-approved training course. Interim control methods require safe work practices and include:

- Paint stabilization. Repair any physical defect in the substrate of a painted surface that is causing paint deterioration, remove loose paint and other material from the surface to be treated, and apply a new protective coating or paint
- Treatment for friction and impact surfaces. Correct the conditions that create friction or impact with surfaces with lead-based paint.
- Treatment for chewable surfaces. If a child under age six has chewed surfaces known or presumed to contain lead-based paint, these surfaces must be enclosed or coated so that they are impenetrable.
- Lead-contaminated dust control. All rough, pitted, or porous horizontal surfaces must be covered with a smooth, cleanable covering. Carpets must be vacuumed on both sides using HEPA vacuums or equivalent.
- Lead-contaminated soil control. If bare soil is contaminated with lead, impermanent surface coverings such as gravel, bark, and sod, as well as land use controls such as fencing, landscaping, and warning signs, may be used.

3.2.6.2.1.3 Standard Treatments

Standard treatments may be conducted in lieu of a risk assessment and interim controls. Lead-based paint is presumed to be present and all painted surfaces are treated as such. Standard treatments are designed to reduce all lead based paint hazards in a unit and must be performed on all applicable surfaces, including bare soil, to control lead-based paint hazards that may be present. All standard treatment methods must follow lead-safe work practices. Standard treatments consist of a full set of treatments that include:

- Paint stabilization,
- Creating smooth and cleanable horizontal surfaces,
- Correcting dust-generating conditions, and

- Remediating bare residential soil.

3.2.6.2.1.4 Interim Control Maintenance

Following completion of interim controls, maintenance activities must be undertaken to avoid creating new lead hazards. Maintenance includes:

- Frequent cleaning of surfaces (e.g., windowsills, floors, carpets), including dusting and wiping with a wet sponge;
- Checking walls for cracks, leaks, chipping, and peeling;
- Repairing cracking, peeling, or chipping paint; and
- Repairing windows so that they slide/open easily.

3.2.6.2.2 Lead Renovation, Repair, and Painting Program Rule (RRP)

Most remediation activities will fall under the EPA's Lead Renovation, Repair, and Painting Program Rule (RRP). RRP requires that firms performing renovation, repair, and painting projects that disturb lead-based paint in homes, child care facilities and pre-schools built before 1978 have their firm certified by EPA (or an EPA authorized state), use certified renovators who are trained by EPA-approved training providers and follow lead-safe work practices.

3.2.6.3 Clearance Inspection

Lastly, failed inspections and subsequent violations can only be removed by one of the following methods:

- Certification by a lead-based paint inspector or risk assessor that the property has been determined through a lead-based paint inspection conducted in accordance with the federal regulations at 40 CFR 745.227(b) not to contain lead-based paint.
- Certification by a lead-based paint inspector or risk assessor that all cited violations have been abated, or interim controls implemented, and clearance has been achieved. In addition, the property must be re-inspected pursuant to those standards since the deteriorated paint or dust-lead hazard violation was last cited, including a full visual assessment.
- Where exterior deteriorated paint violations, including deteriorated paint violations on an open porch, and/or bare soil violations are cited, or where interior deteriorated paint

violations are cited in a common area, as per the definition of a “dwelling unit,” clearance may be established through a visual assessment by a City inspector after reduction measures have been implemented.

3.2.7 *No Action Alternative*

Human health implications are at the forefront of this proposal; the Ordinance’s main objective is to improve health within the City as it pertains to lead hazards. Under the No-Action alternative, no improvement to the existing problem would be observed.

3.2.8 *Proposed Mitigation*

The Ordinance's main objective is to reduce the rate of lead exposure in the City given the significant impact that it has on residents, especially children. Impacts that could arise during remediation activities will be avoided by implementation of lead safe work practices. Appropriate remediation based upon requirements established by the EPA will ensure the effectiveness of remediating lead hazards. As such, no additional mitigation measures are necessary.

3.3 GROWTH AND CHARACTER OF THE COMMUNITY

3.3.1 *Existing Conditions*

The Ordinance involves amending the municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. As such, the proposed action will impact pre-1978 structures and associated land uses adjacent to such properties. There are potential economic implications associated with introduction of necessary maintenance and repair requirements that could result in adverse impacts. Items for consideration include, but are not limited to, the following:

- Property types effected
- Tenant protections including how occupants will be protected against retaliatory eviction
- Disclosure and other requirements upon property transfer
- The potential for housing abandonment associated with cost of remediation activities

Additional economic items to consider with regard to the no-build scenario include:

- Loss of future income of affected families and individuals
- Increased health care costs
- Need for special education

- Increase burden on the criminal justice system
- Cost to New York State for lead poisoning intervention efforts
- Increased need for/cost of litigation or legal counsel

3.3.2 *Potential Impacts*

The lead ordinance will authorize inspection by City of Syracuse personnel associated with Rental Registry and Certificate of Compliance. Building owners are required to obtain a Rental Registry Certificate for each one-family and/or two-family non-owner occupied dwelling rented or leased within the City. The City of Syracuse issues Certificates of Compliance for three- , four-, and five-family rental properties. Visual inspections will also occur as a result of a filing of a complaint. As such, the Ordinance will involve one- to five-family rental properties built prior to 1978. The structures affected are consistent in both Alternative 1 and Alternative 2.

Table 7 provides a summary of those structures anticipated to be affected by the Ordinance.

Table 7. City of Syracuse Rental Registry and Certificate of Compliance Structures

Item	Rental Registry (IPS /Reed Report)[59]				Certificate of Compliance (MPD from Oct 2019)[60]					
	One Family Rentals		Two Family Rental		Three-Family Rental		Four-Family Rental		Five-Family Rental	
	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later
Total Structures	4665	189	4065	48	666	7	446	10	127	1
Total Units	4665	189	8130	96	1998	21	1784	40	635	5
Total Structures in NRSA	2550	106	2395	23	442	5	318	7	78	1

[59] City of Syracuse, Integrated Property System (IPS). (2019). Rental Registry [Datafile]
[60] City of Syracuse, Integrated Property System (IPS). (2019). Rental Registry [Datafile]

Item	Rental Registry (IPS /Reed Report)[59]				Certificate of Compliance (MPD from Oct 2019)[60]					
	One Family Rentals		Two Family Rental		Three-Family Rental		Four-Family Rental		Five-Family Rental	
	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later	Built <1978	Built 1978 or Later
Total Units in NRSA	2550	106	4790	46	1326	25	1272	28	390	5

3.3.2.1 Property Transfer and Notifications

Under federal regulations, landlords must give prospective tenants of buildings built before 1978 the following information:

- An EPA-approved information pamphlet on identifying and controlling lead-based paint hazards.
- Any known information concerning lead-based paint or lead-based paint hazards pertaining to the building.
- For multi-unit buildings this requirement includes records and reports concerning common areas and other units when such information was obtained as a result of a building-wide evaluation.
- A lead disclosure attachment to the lease, or language inserted in the lease, that includes a "Lead Warning Statement" and confirms that you have complied with all notification requirements.

In addition, real estate agents have additional requirements under federal regulations. These include the following:

- Inform the seller of his or her obligations under the Real Estate Notification and Disclosure Rule. In addition, the agent is responsible if the seller or lessor fails to comply; unless the

failure involves specific lead-based paint or lead-based paint hazard information that the seller or lessor did not disclose to the agent.

- Provide, as part of the contract process, an EPA-approved information pamphlet on identifying and controlling lead-based paint hazards. Attach to contract, or insert language in the contract, a "Lead Warning Statement" and confirmation that you have complied with all notification requirements.
- Provide a 10-day period to conduct a paint inspection or risk assessment for lead-based paint or lead-based paint hazards. Parties may mutually agree, in writing, to lengthen or shorten the time period for inspection. Homebuyers may waive this inspection opportunity.

Lastly, the City will maintain a database, accessible to the public, of all residential properties where lead hazards have been identified, reduced and controlled with funds received by the City from the United States Department of Housing and Urban Development. The City shall further maintain a database of all residential properties granted a certificate of occupancy. These databases will be available to “walk-in” inspection by the public. Freedom of Information request will not be required to review this database.

The property transfer requirements are consistent for both Alternatives.

3.3.2.2 Landlord and Property Management Business Economic Considerations

Potential adverse impacts associated with the Ordinance include the potential loss of landlord income. If the implementation of the Ordinance results in a cost too high, properties will either be sold or abandoned. This will negatively affect business and personal income related to property owners and people in the property management business. Estimating specific economic impacts with respect to the number of potential property sales and abandonment that would occur would be speculative, as it will be the property owner's perspective as to how lead mitigation will occur[61]. As previously mentioned, the City of Rochester implemented similar legislation in 2006. The CGR Report found that approximately one-third of landlords that responded to a survey did not incur any costs associated with lead violations.[62] The average cost for repairs associated with lead

[61] Ecology and Environment. Final Generic Environmental Impact Statement to Assess Lead Poisoning Prevention Ordinance Alternatives for the City of Rochester, New York. 2005. 359 Pages.

[62] Boyce et. al. Center for Governmental Research. An Evaluation of the City of Rochester’s Lead Law: 2006-2008. Dated November 2008. 75 pages.

mitigation for those landlords that did observe costs was approximately $2,618 in the first year of implementation; a little more than half (56%) of those landlords incurred costs less than $1,000.[63] The majority of the repairs were associated with repairing or repainting windows, while the majority of the more expensive methods involved window replacements.[64] In addition, the CGR report indicates that some property owners received grant-funded reimbursements for lead mitigation costs. It should also be noted that in those instances where significant repairs are made (i.e. window replacement), landlords may observe an increase in property value.

There is a threat of potential abandonment of properties due to the additional costs that will be incurred by property owners. These costs will impact the City's receipt and use of tax revenue.

Both Alternative 1 and Alternative 2 will result in the identification of lead hazards that will lead to building owner costs associated with mitigation. Alternative 1 includes dust wipe sampling as part of clearance protocols. Dust wipe sampling is a more comprehensive clearance test as compared to visual inspection, and it is assumed that use of dust wipe sampling will result in a higher rate of hazard identification and subsequent mitigation. As such, Alternative 1 may result in higher costs to local property management and businesses as compared to Alternative 2.

3.3.2.3 Tenant Protection

The potential for retaliation from landlords to tenants as a result of this Ordinance exists. As such, the City will adopt legislation to prevent this occurrence. Specifically, it will be unlawful for an owner to take any retaliatory action toward a tenant who reports a suspected lead-based paint hazard to the owner or to the City. Retaliatory actions include but are not limited to any actions that materially alter the terms of the tenancy (including rent increases and nonrenewals) or interfere with the occupants' use of the property. Tenant protection would be provided for both Alternatives 1 and 2.

3.3.2.4 Positive Economic Considerations

Potential positive economic considerations include employment related to inspections, an increase in demand for lead sampling and analysis, and retail spending on home improvement projects.

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[63] Boyce et. al. Center for Governmental Research. An Evaluation of the City of Rochester's Lead Law: 2006-2008. Dated November 2008. 75 pages.

[64] Boyce et. al. Center for Governmental Research. An Evaluation of the City of Rochester's Lead Law: 2006-2008. Dated November 2008. 75 pages.

There will be an increased demand for work done by certified EPA lead evaluation firms. There are approximately 19 lead-based paint evaluation firms in the local Syracuse area. These firms will gain more business from implementation of the Ordinance.

The Ordinance will allow property owners to either perform the work themselves or use general contractors to perform the work unless abatement is performed. Abatement activities require certified contractors to perform this work. In addition to increased demand for certified lead evaluation contractors, there will also be additional work for laboratories to analyze dust and soil samples.

Another positive economic impact resulting from the implementation of the Ordinance would be additional spending in the local retail market for home improvement supplies. This includes paint and other interim control supplies, replacement windows, and supplies to renovate porches, stairs and flooring. This economic impact is directly proportional to the number of property owners that will perform lead remediation activities.

Both Alternative 1 and Alternative 2 will result in the identification of lead hazards that will lead to building owner costs associated with mitigation. Alternative 1 includes dust wipe sampling as part of clearance protocols. Dust wipe sampling is a more comprehensive clearance test as compared to visual inspection, and it is assumed that use of dust wipe sampling will result in a higher rate of hazard identification and subsequent mitigation. As such, Alternative 1 may result benefit lead sampling and analysis firms, and home improvement centers as compared to Alternative 2.

3.3.3 *No-Action Alternative*

There would be no direct or measurable significant impacts to the economy, employment or income under the No Action Alternative. However, studies have hypothesized that not addressing lead poisoning in children results in economic impacts. Potential economic issues that may arise as a result of continued lead poisoning as described in *Long-term costs of lead poisoning: How much can New York save by stopping lead?* include the following:

- Lost future income – Medical research suggests a strong relationship between elevated blood levels and a lowered IQ. Lower IQ is subsequently linked to reduced income earned over a person's lifetime.

- Health care costs - The cost of lead treatment for severely poisoned children (including monitoring and follow on treatment of the child).
- Special education – Research supports the link between childhood lead poisoning and lowered IQ. This contributes to children's need for special education.
- Criminal justice -The potential link between lead poisoning and delinquent behavior and violent crime would result in costs related to criminal activity including prosecution, incarceration, etc.
- State cost for lead poisoning prevention – New York State subsidizes costs relative to education, prevention, and response to childhood lead poisoning.
- Legal liability- The potential cost of litigation brought forth against municipalities.[65]

In the *Long-term costs of lead poisoning: How much can New York save by stopping lead?*, Korfmacher provides a summary of potential economic benefits to the State by eliminating lead poisoning, and potential increase in earnings exceeds 700 million dollars where costs savings exceed 30 million annually[66]. Some cost savings are unable to be quantified. The City of Syracuse is not studied as part of this research; however, it is reasonable to conclude that the local economy could be effected proportionately.

3.3.4 ***Proposed Mitigation***

Potential mitigation measures that would serve to reduce the burden on property owners include such measures as making federal, state, and local funds available for lead-hazard control measures, aiding in the application for grant money to perform work, and providing additional guidance on the best ways to identify and control potential lead hazards.

Onondaga County Health Department provides information relative to grants and loans for home repair at http://www.ongov.net/health/lead/financialassistance.html. Onondaga County Community Development administers the Lead Hazard Reduction Program (LHG). The LHG is a program to reduce lead paint hazards in privately owned, residential structures in Onondaga County.

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[65] Kormacher, Katrina Smith, PhD. Long-term costs of lead poisoning: How much can New York *save* by stopping lead?. July 9, 2003. 11 pages.

[66] Kormacher, Katrina Smith, PhD. Long-term costs of lead poisoning: How much can New York *save* by stopping lead?. July 9, 2003. 11 pages.

Onondaga County Health Department also provides information relative to guidance to control and identify lead hazards at the Lead Poisoning Prevention Program website at http://www.ongov.net/health/lead/.

4.0 UNAVOIDABLE ADVERSE IMPACTS

The proposed Project will result in long-term benefits to the community as a result of reduced lead exposure. Despite the positive effects anticipated as a result of the Ordinance, it will result in certain unavoidable impacts. Many of these impacts will be temporary, and will result from lead mitigation construction activities (e.g., temporary relocations). Potential significant impacts are anticipated with regard to human health, community character, and historic resources. These impacts are evaluated in Section 3.0 of the FGEIS. Although adverse environmental impacts may occur, they will be minimized through the use of various general and site-specific avoidance and mitigation measures. With the implementation of these mitigation measures, the Ordinance is expected to result in positive, long-term overall impacts that will offset the adverse effects that cannot otherwise be avoided.

The following subsections summarize general mitigation and avoidance measures that have been incorporated into the Ordinance, and specific mitigation and avoidance measures proposed to minimize adverse impacts to specific resources.

4.1 GENERAL MINIMIZATION AND AVOIDANCE MEASURES

SEQRA regulations require public input into the environmental review of proposed projects so that potential adverse impacts can be identified prior to implementation and avoided or mitigated to the greatest extent practicable. This FGEIS was prepared consistent with these regulations, and provides the primary means by which the potential costs and benefits are described and weighed in a public forum. Compliance with SEQRA regulations provides a mechanism whereby public and agency comments are solicited and addressed, alternatives are evaluated, and potential adverse impacts are identified and mitigated to the extent practicable. Response to comments and preparation of the Final Environmental Impact Statement (FGEIS) provides the information necessary for the Lead Agency to draw conclusions (Findings Statement) regarding the Ordinance's overall environmental impacts, and impose conditions on SEQRA approval, if necessary.

Compliance with the other applicable federal, state, and local regulations/guidelines governing the implementation and subsequent lead mitigation activities of the proposed Ordinance also will serve to minimize adverse impacts. Lead mitigation activities that arise as a result of the proposed Ordinance will be in compliance with state building codes and design standards, and federal OSHA guidelines to protect the safety of workers and the public.

4.2 SPECIFIC MITIGATION MEASURES

The Ordinance will also include specific measures to mitigate potential impacts to specific resources. These were described in detail in Section 3.0, but generally include the following:

- Properties listed or Eligible for Listing on the National Register or on the City's Historic Property List, and properties located within Local Preservation Districts or designated as a Local Protected sites will be protected from inappropriate alteration by existing zoning regulations. Potential impacts will be evaluated as projects resulting from the Ordinance are identified. Those designated resources requiring further evaluation by the SHPO under either the State or Federal preservation acts will be assessed prior to commencement of lead hazard mitigation.
- Required implementation of lead safe work practices will reduce potential significant impacts during remediation activities. Appropriate training, certification, and remediation based upon requirements established by the EPA Renovate, Repair and Painting Rule will ensure the effectiveness of remediating lead hazards.
- Potential mitigation measures that would serve to reduce the burden on property owners include such measures as making federal, state, and local funds available for lead-hazard control measures, aiding in the application for grant money to perform work, and providing additional guidance on the best ways to identify and control potential lead hazards.
- Onondaga County Health Department provides information relative to grants and loans for home repair at http://www.ongov.net/health/lead/financialassistance.html. Onondaga County Community Development administers the Lead Hazard Reduction Program (LHG). The LHG is a program to reduce lead paint hazards in privately owned, residential structures in Onondaga County.

- Onondaga County Health Department also provides information relative to guidance to control and identify lead hazards at the Lead Poisoning Prevention Program website at http://www.ongov.net/health/lead/.

5.0 ALTERNATIVES ANALYSIS

This section of the FGEIS will include a description and evaluation of potential alternatives for the proposed Ordinance. Alternatives to be considered will include the No Action alternative, an alternative that establishes a lead ordinance with a designated "high risk" area, and an alternative that establishes a lead ordinance without the designated "high risk" area. Alternatives will be evaluated for their potential to mitigate impacts and for their ability to meet the goals of the City of Syracuse. As stated in Section 2, the goal of the Ordinance is to reduce the rate of lead exposure in the City. The need for a lead ordinance is based on the significant impact that lead exposure has on residents, especially children.

Alternative 1: Establish a lead ordinance that requires that the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and are correctly addressed by reducing and controlling lead-based paint hazards which may be present, in order to prevent human exposure to such hazards. The Ordinance will require inspections for lead paint hazards as part of the City's current rental unit inspection processes. Included in this alternative are the following components:

- Inspections for lead paint hazards will occur during the time for a City housing inspection triggered by a new or renewal certificate of compliance pursuant to Section 27-15 of the Property Conservation Code of the City of Syracuse, an application for a rental registry certificate pursuant to Section 27-131 of the Property Conservation Code of the City of Syracuse, or based upon the filing of a complaint. The inspection shall include a visual assessment for deteriorated paint and bare soil violations.

- Housing units will be exempt if they are already required to be safe from lead paint hazards under Federal law, or an EPA certified risk assessor deems that the unit has no lead-based paint.

- The lead ordinance will assume the presence of lead-based paint in all properties built before 1978.

- Property owners will be required to repair areas of documented deteriorated paint and then pass a clearance inspection.

- Authorization of City officials to identify a "high risk" area. High risk areas will be based a number of factors including, but not limited to, Onondaga County Health Department inspections, and elevated lead blood-levels observed during New York State mandated testing. High-risk area units are subject to additional inspection and clearance requirements as compared to those outside this designated area.

- Establish that all inspections, including those performed as part of an application for rental certificate or based on a complaint, should include a visual assessment for deteriorated paint and bare soil violations. If no interior deteriorated paint violations are identified during the visual assessment and the property is in the high-risk area, a dust-wipe sample must be taken to determine whether a lead-dust hazard exists.

- The Ordinance will detail procedures for how dust-wipe samples will be taken, establish standards for clearance examination by a third-party and associated reporting, and allow for city officials to undertake an audit of clearance examinations at the discretion of the Director of Code Enforcement.

- Establish violation standards and penalties.

Alternative 2: Establish a lead ordinance that requires that the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and be correctly addressed by reducing and controlling lead-based paint hazards which may be present, in order to prevent human exposure to such hazards. The Ordinance will require inspections for lead paint hazards as part of the City's current rental unit inspection processes. As compared to Alternative #1, this alternative excludes designation of a 'high risk" area and subsequent dust-wipe sample clearance protocols. Included in this alternative are the following components:

- Inspections for lead paint hazards will occur during the time for a City housing inspection triggered by a new or renewal certificate of compliance pursuant to Section 27-15 of the Property Conservation Code of the City of Syracuse, an application for a rental registry

certificate pursuant to Section 27-131 of the Property Conservation Code of the City of Syracuse, or based upon the filing of a complaint. The inspection shall include a visual assessment for deteriorated paint and bare soil violations.

- Housing units will be exempt if they are already required to be safe from lead paint hazards under Federal law, or an EPA certified risk assessor deems the unit has no lead-based paint.
- The lead ordinance will assume the presence of lead-based paint in all properties built before 1978.
- Property owners will be required to repair areas of documented deteriorated paint and then pass a clearance inspection.
- Establish that all inspections, including those performed as part of an application for rental certificate or based on a complaint, should include a visual assessment for deteriorated paint and bare soil violations.
- The Ordinance will establish standards for clearance examination by a third-party and associated reporting, and allow for city officials to undertake an audit of clearance examinations at the discretion of the Director of Code Enforcement.
- Establish violation standards and penalties.

5.1 NO ACTION

Under this alternative, the pre-existing conditions would generally be maintained. The desired goal of reducing lead poisoning rates in the City would not be observed.

5.2 ALTERNATIVE SCREENING

As required by SEQR, the No Action Alternative was considered in addition to the other alternatives. As seen in the table below, the No-Action alternative was carried forward during the review to serve as a control to help evaluate the potential effects of the other alternatives.

Table 8. List of Alternatives

Alternative	Description
No-Action	No action alternative
1	Lead Ordinance with "High Risk" area designation
2	Lead Ordinance, no "High Risk" area designation

The purpose of the alternative screening is to evaluate whether the alternatives meet the project objectives. Those alternatives which do not fully meet the project's objectives can be eliminated from consideration. The remaining alternatives are then considered further to identify which satisfy the objectives in a more feasible, cost effective, and environmentally sustainable manner. As stated previously, the goals of the project sponsor are:

- Effectively reduce the rate of lead exposure in the City. The Ordinance must be cost effective, and focus on those within the City at greatest risk. The need for a lead ordinance is based on the significant impact that lead exposure has on residents, especially children. New York State's policy framework for primary prevention to address lead hazards in housing before children are effected provides limited financial resources. New York State Department of Health requires lead testing for children at ages one and two and provides for educational and environmental interventions for children after elevated blood lead levels are observed; however, this program enacts measures after lead exposure occurs. The City of Syracuse proposed Ordinance defines methods to control lead hazards before they result in EBLL.

The results of the objectives screening are summarized in Table 9:

Table 9. Results of Phase One Alternative Screening

Alternative	Description	Meets Objective
1	No Action alternative	No
2	Lead Ordinance with "High Risk" area designation	Yes
3	Lead Ordinance, no "High Risk" area designation	Yes

Under the No-Action Alternative, the pre-existing conditions would generally be maintained. The desired goal of reducing lead poisoning rates in the City would not be observed. There would be no direct or measurable significant impacts to the economy, employment or income under the No Action Alternative. However, studies have hypothesized that not addressing lead poisoning in children results in economic impacts. Potential economic issues that may arise as a result of continued lead poisoning as described in *Long-term costs of lead poisoning: How much can New York save by stopping lead?* include the following:

- Lost future income – Medical research suggests a strong relationship between elevated blood levels and a lowered IQ. Lower IQ is subsequently linked to reduced income earned over a person's lifetime.
- Health care costs - The cost of lead poisoning treatment for severely poisoned children (including monitoring and follow on treatment of the child).
- Special education – Research supports the link between childhood lead poisoning and lowered IQ. This contributes to children's need for special education.
- Criminal justice -The potential link between lead poisoning and delinquent behavior and violent crime would result in costs related to criminal activity including prosecution, incarceration, etc.
- State cost for lead poisoning prevention – New York State subsidizes costs relative to education, prevention, and response to childhood lead poisoning.
- Legal liability- The potential cost of litigation brought forth against municipalities.[67]

In *Long-term costs of lead poisoning: How much can New York save by stopping lead?*, Korfmacher provides a summary of potential economic benefits to the State by eliminating lead poisoning, and potential increase in earnings exceeds 700 million dollars where costs savings exceed 30 million annually[68]. Some cost savings are unable to be quantified. The City of Syracuse

[67] Kormacher, Katrina Smith, PhD. Long-term costs of lead poisoning: How much can New York *save* by stopping lead?. July 9, 2003. 11 pages.

[68] Kormacher, Katrina Smith, PhD. Long-term costs of lead poisoning: How much can New York *save* by stopping lead?. July 9, 2003. 11 pages.

is not studied as part of this research; however, it is reasonable to conclude that the local economy could be effected proportionately.

Under Alternative 1, the Ordinance would be established consistent with the City's goal to reduce the rate of lead exposure in the City. This Alternative defines methods to control lead hazards before they result in EBLL. It provides protection to the public during lead mitigation activities, and provides protection for tenants against retaliation associated with submitting lead hazard complaints. Controls are in place to protect historic resources during lead mitigation activities. This alternative also provides a mechanism for focusing efforts in "high risk" areas where both the density of rental properties and EBLL cases are high. Use of dust wipe sampling will occur in these "high risk" areas for clearance testing. Clearance with the use of dust wipe sampling is a more comprehensive analysis. Dust wipe sampling can identify small particles of lead contaminated dust not visible to the naked eye. Clearance using dust wipes provides a more definitive conclusion that the hazard has been removed. The addition of dust wipe sampling increases costs for clearance. Using this method in "high risk" areas is a cost effective approach to meeting the Ordinance's objective. The means and methods for visual assessment, designation of "high risk" area, and dust wipe clearance requirements will be established by the City, and will evolve as appropriate as a result of future health testing results, unknown data/research findings, budgetary considerations, or other unforeseen matters.

Under Alternative 2, the Ordinance would be established consistent with the City's goal to reduce the rate of lead exposure in the City. This Alternative defines methods to control lead hazards before they result in EBLL. It provides protection to the public during lead mitigation activities, and provides protection for tenants against retaliation associated with submitting lead hazard complaints. Controls are in place to protect historic resources during lead mitigation activities. However, this alternative does not provide dust wipe sampling for clearance testing and would rely upon visual assessment alone. Costs associated with this alternative are reduced as compared to Alternative 1. However, the effectiveness of clearance activities in this alternative is reduced. Alternative 1 allows for use of dust wipe sampling, and it also allows for modifications to "high risk" designated areas associated with future health testing results, currently unknown data/research findings, economic considerations, and other unforeseen measures.

As such, Alternative 1 is considered the preferred alternative as it meets the project objective and overall is the most feasible, cost effective, and environmentally sustainable solution.

6.0 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

A resource commitment is considered irreversible when direct and indirect impacts from its use limit future use options. Irreversible commitments apply primarily to nonrenewable resources and also to those resources that are renewable only over long periods of time (e.g., soil productivity). A resource commitment is considered irretrievable when the use or consumption of the resource is neither renewable nor recoverable for future use.

The proposed Project will require the irreversible and irretrievable commitment of certain human, material, environmental, and financial resources. Human and financial resources have already been expended by the City of Syracuse, Onondaga County, the State of New York (i.e., various state agencies), and the United States (i.e., various federal agencies) during the planning and review of the Project. The expenditure of funds and human resources will continue to be required throughout the implementation of the Ordinance (i.e., inspections, lead mitigation).

The Ordinance does not require a commitment of land as there is no development proposed.

Various types of manufacturing and construction materials and building supplies will be committed to mitigation projects as a result of the Ordinance. The use of these materials, such as concrete, steel, brick, glass, lumber, mechanical equipment, hardware, etc., will represent a long-term commitment of these resources, which will not be available for other projects. Although some of these materials (e.g., steel, glass) could be recovered and recycled, the use of these materials for the most part represents an irreversible and irretrievable commitment of resources.

Energy resources also will be irretrievably committed to Ordinance, during both the inspection process and subsequent lead mitigation projects. Fuel, lubricants, and electricity will be required during site inspection, and lead mitigation preparation and construction activities, as well as operation of various types of construction equipment and vehicles, and for the transportation of workers and materials. Consumption of these energy resources can be considered a irreversible and irretrievable commitment of resources.

The commitment of resources, when compared with the public purpose and benefits of the proposed action, are considered to be a positive result that will provide a public health benefit that will continue into the future.

7.0 CUMULATIVE IMPACTS

In accordance with 6 NYCRR § 617.9(b)(5)(iii)(a), SEQR requires a discussion of cumulative impacts "at a level of detail that reflects the severity of the impacts and the reasonable likelihood of their occurrence". A cumulative impact is an impact on the environment that could result from the incremental impact of the proposed action when added to other past, present or reasonably foreseeable future actions. Cumulative impacts can result from individually minor, but collectively significant actions that take place over time.

One such example of a cumulative impact would be the combination of one of these ordinances and any future ordinances, directly related to the city building code, which would affect the property owners and the housing stock of the city. The impacts are anticipated to be minimal since the need for any future ordinances relating to lead-based paint is not expected. The City currently has no ordinances similar to the proposed.

The proposed ordinance would also work to further the City and Onondaga County's many initiatives and programs that are working to eliminate childhood EBLL. The impact the proposed ordinance will have on these programs is expected to be beneficial to the community.

In summary, the Ordinance, when combined with other foreseeable actions, is not anticipated to result in cumulative impacts.

8.0 GROWTH INDUCING ASPECTS

As defined by the NYSDEC in the SEQR Handbook, a proposed project may "trigger" further development if:

- it significantly increases the local population by creating or relocating employment, causing subsequent increases in demand for support services and facilities; or
- it increases the development potential of the surrounding area through the installation or improvement of sewers, water mains, or other utilities.[69]

The Ordinance will not involve or induce actions that will increase the local population by creating or relocating employment; and therefore, there will be no subsequent increase in demand for support services and related facilities. The Ordinance does not involve upgrades or extension of utilities. As such, the Ordinance will not involve growth-inducing activities.

[69] NYSDEC. 2019. DRAFT *The SEQR Handbook. Fourth Edition*. Division of Environmental Permits. Albany, NY. Available at: http://www.dec.ny.gov/docs/permits_ej_operations_pdf/dseqrhandbook.pdf (Accessed December 2019).

9.0 EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES

The U.S. Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) program provides a framework for defining and measuring the performance of resource efficiency and environmental health in the design and construction of the built environment. Each proposed project is scored on a basis of 110 total available points between seven topic areas, outlined as follows:

- Sustainable Sites
- Water Efficiency
- Energy and Atmosphere
- Materials and Resources
- Indoor Environmental Quality
- Innovation in Design
- Regional Priority (USGBC, 2010).

The process of obtaining LEED certification requires applicants to incorporate the concepts of resource efficiency and environmental health throughout the entire design and construction process. Applicants submit project checklists and detailed accounts of the proposed design, procurement processes, materials, emissions, and controls to support their proposed scores. The USGBC reviews each application, and certifies projects as appropriate along a scale from 40 to 110 points. The City will not be directly undertaking new construction or renovation projects, and therefore there is no LEED goal relative to the Ordinance.

The proposed Ordinance does not involve new construction. Minor renovations are anticipated as a direct result of the Ordinance by building owners. There will most likely be several options available to building owners with respect to lead mitigation. The specific scope of work will be determined by the owner and on a case-by-case basis. Projects that meet the criteria established by

the City that require a building permit or zoning review will require consistency with the New York State Energy Conservation Construction Code.

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Appendix A

Draft Lead Ordinance

General Ordinance No. 2020

ORDINANCE AMENDING THE REVISED GENERAL ORDINANCES OF THE CITY OF SYRACUSE, TO ADD A NEW CHAPTER 54 ENTITLED LEAD ABATEMENT AND CONTROL

BE IT ORDAINED, the Revised General Ordinances of the City of Syracuse, as amended, is hereby amended to create a new Chapter 54 as follows:

Article 1 Policy and Intent.

It is the policy of the City of Syracuse to help prevent the poisoning of its residents by requiring that the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and be correctly addressed by reducing and controlling lead-based paint hazards which may be present, in order to prevent human exposure to such hazards.

Section 54-1 Legislative findings.

A. Lead poisoning poses a serious public health threat to children and adults in the City of Syracuse.

B. Younger children are particularly susceptible to the hazards of lead-based paint since their bodies are still developing. Fetuses are also vulnerable to the effects of lead-based paint because pregnant women can transfer lead to their fetuses, which can result in adverse developmental effects.

C. A small amount of lead can cause elevated blood lead levels resulting in serious and irreversible developmental damage, particularly in children under the age of six years.

D. Exposure to lead hazards from deteriorated lead-based paint is a primary cause of elevated blood lead levels in humans.

E. Structures built before 1978 are the most likely to contain lead-based paint hazards.

F. Residential properties are more likely than are nonresidential properties to be a source of exposure to lead-based paint hazards by children.

G. Children living in older, poorly maintained homes are disproportionately at risk for

lead-based paint hazards.

H. The exposure to lead-based paint hazards in the City of Syracuse is most common, and presents the most serious risk, to young children residing in rental housing built before 1978.

I. It is essential to the overall public health of persons in the City of Syracuse, and particularly for children younger than six years of age, that they be protected from exposure to lead-based paint hazards.

Section 54-2 **Definitions.**

As used in this chapter, the following terms shall have the meanings indicated:

ABATEMENT – Any set of measures design to permanently eliminate lead-based paint or lead-based paint hazards. (See definition of "permanent"). "Abatement" includes:

A. The removal of lead-based paint and dust-lead hazards, the permanent enclosure or encapsulation of lead-based paint, the replacement of components or fixtures painted with lead-based paint, and the removal or permanent covering of soil-lead hazards; and

B. All preparation, cleanup, disposal, and post-abatement clearance testing activities associated with such measures.

CERTIFIED – Licensed or certified to perform such activities as risk assessment, lead-based paint inspection, lead dust wipe tests or abatement supervision by the United States Environmental Protection Agency (EPA) in accordance with 40 CFR Part 745, Subpart L. Any individual who has been licensed or certified by the EPA will be approved as certified by the City for the purpose of performing such licensed activities, provided that such approvals are subject to suspension or revocation after a finding of nonresponsibility by the Director pursuant to §54-7I.

CERTIFIED LEAD-BASED PAINT INSPECTOR – An individual who has been trained by an accredited training program, as defined by 40 CFR 745.223, and certified by the EPA pursuant to 40 CFR 745.226 to conduct lead-based paint inspections, whose approval to conduct such inspections in the City is not subject to suspension or revocation after a finding of non-responsibility pursuant to §54-7I. A certified lead-based paint inspector also samples for the presence of lead in dust and soil for the purposes of clearance testing.

CERTIFIED LEAD DUST WIPE TECHNICIAN – An individual who has been trained by an accredited training program, as defined by 40 CFR 745.223, and certified by the EPA pursuant to 40 CFR 745.226 to conduct lead dust wipe tests, whose approval to conduct such dust wipe tests in the City is not subject to suspension or revocation after a finding of non-responsibility pursuant to §54-7I.

CERTIFIED RISK ASSESSOR – An individual who has been trained by an accredited training program, as defined by 40 CFR 745.223, and certified by the EPA pursuant to 40 CFR 745.226 to conduct risk assessments, whose approval to conduct such risk assessments in the City is not subject to suspension or revocation after a finding of non-responsibility pursuant to §54-7I. A certified risk assessor also samples for the presence of lead in dust and soil for the purpose of clearance testing.

CHEWABLE SURFACE – An interior or exterior accessible painted surface that a young child can mouth or chew. Hard metal substrates and other materials that cannot be dented by the bite of a young child are not considered chewable.

CLEARANCE EXAMINATION – An activity conducted following lead-based paint hazard reduction activities to determine that the hazard reduction activities are complete and that no soil-lead hazards or settled dust-lead hazards, as defined in this article, exist in the dwelling unit or worksite.

COMMISSIONER – The Commissioner of the Department of Neighborhood and Business Development for the City of Syracuse.

COMMON AREA – A portion of a residential property that is available for use by occupants of more than one dwelling unit. Such an area may include, but is not limited to, hallways, stairways, laundry and recreational rooms, playgrounds, community centers, on-site day-care facilities, porches, basements, attics, garages and boundary fences.

COMPONENT – An architectural element of a dwelling unit or common area identified by type and location, such as a bedroom wall, an exterior window sill, a baseboard in a living room, a kitchen floor, an interior window sill in a bathroom, a porch floor, stair treads in a common stairwell, or an exterior wall.

CONTAINMENT – The physical measures taken to ensure that dust and debris created or released during lead-based paint hazard reduction are not spread, blown or tracked from inside to outside of the worksite.

DEPARTMENT – The department of Neighborhood and Business Development of the City of Syracuse.

DETERIORATED PAINT – Any interior or exterior paint or other coating that, through a visual assessment, is found to be peeling, chipping, crazing, flaking, abrading, chalking or cracking, or any paint or coating located on an interior or exterior surface or fixture that is otherwise damaged or separated from the substrate, or a chewable surface that contains visual signs of chewing.

DIRECTOR – The Director of the Division of Code Enforcement of the Department of Neighborhood and Business Development of the City of Syracuse.

DRIPLINE – The area within three feet surrounding the perimeter of a building.

DRY SANDING – Sanding without moisture and includes both hand and machine sanding.

DUST-LEAD HAZARD – Surface dust that contains a dust-lead loading (area concentration of lead) at or exceeding the levels listed in §54-7D.

DWELLING UNIT –

A. A single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation; or

B. A room or group of rooms forming a single habitable space equipped and intended to be used for living, sleeping, cooking and eating which does not contain, within such a unit, a toilet, lavatory and bathtub or shower; or

C. Any room or group of rooms forming a single habitable unit occupied or intended to be occupied for sleeping or living, but not for cooking purposes.

For the purposes of this definition, a basement or attic that is accessible from inside a dwelling unit is considered to be part of the dwelling unit. Common areas and basements and/or attics that are only accessible through a common area or from the exterior of the property are not considered to be part of the dwelling unit.

ENCAPSULATION – The application of a coating or adhesively bonded material or coating that acts as a barrier between the lead-based paint and the environment and that relies for its durability on adhesion between the encapsulant and the painted surface, and on the integrity of the existing bonds between paint layers and between the paint and the substrate. Encapsulation may be used as a method of abatement if it is designed and performed so as to be permanent. (See definition of "permanent").

ENCLOSURE – The use of rigid, durable construction materials that are mechanically fastened to the substrate in order to act as a barrier between lead-based paint and the environment. Enclosure may be used as a method of abatement if it is designed to be permanent. (See definition of "permanent").

EVALUATION – A risk assessment, a lead hazard screen, a lead-based paint inspection, paint testing, or a combination of these to determine the presence of lead-based paint hazards or lead-based paint.

FRICTION SURFACE – An interior or exterior surface that is subject to abrasion or friction, including, but not limited to, certain window, floor, and stair surfaces.

g – The abbreviation for "gram."

HAZARD REDUCTION – Measures designed to reduce or eliminate human exposure to

lead-based paint hazards through methods including interim controls or abatement or a combination of the two.

year OFFICER – A person designated by the Commissioner of the Department of Neighborhood and Business Development to conduct any hearing required by this section.

HEPA VACUUM – A vacuum cleaner that expels all the air it draws into the machine through a high-efficiency particulate air (HEPA) filter during its final filtration stage. A HEPA filter is capable of removing at least 99.97% of any airborne particles with a size of 0.3 microns (µm). HEPA vacuums must be operated and maintained in accordance with the manufacturer's instructions.

IMPACT SURFACE – An interior or exterior surface that is subject to damage by repeated sudden force, such as certain parts of door frames.

INTERIM CONTROLS – A set of measures designed to temporarily reduce human exposure or likely exposure to lead-based paint hazards. Interim controls include, but are not limited to, repairs, painting, temporary containment and specialized cleaning.

LEAD-BASED PAINT – Paint or other surface coatings that contain lead either equal to or exceeding the federal standard found in 40 CFR Subchapter R ("Toxic Substance Control Act"), which, as of the adoption of this Ordinance, defined lead-based paint to be paint or other surface coatings containing lead either equal to or exceeding 1.0 milligram per square centimeter or 0.5% by weight or 5,000 parts per million (ppm) by weight.

LEAD-BASED PAINT HAZARD – Any condition that causes exposure to lead from dust-lead hazards, soil-lead hazards, or lead-based paint that is deteriorated or present in chewable surfaces, friction surfaces, or impact surfaces, and that would result in adverse human health effects.

LEAD-BASED PAINT INSPECTION – A surface-by-surface investigation to determine the presence of lead-based paint and the provision of a report explaining the results of the investigation.

LEAD HAZARD INFORMATION PAMPHLET – The most recent publication of the lead hazard information pamphlet means the pamphlet developed by the EPA, the United States Department of Housing and Urban Development and the Consumer Product Safety Commission pursuant to Section 403 of the Toxic Substances Control Act (15 U.S.C. §2686), entitled "Protect Your Family From Lead in Your Home."

LEAD DUST SAMPLING TECHNICIAN – An individual who has been trained by an accredited training program, as defined by 40 CFR 745.223, to conduct lead dust wipe tests, whose approval to conduct such dust wipe tests in the City is not subject to suspension or revocation after a finding of non-responsibility pursuant to §54-7I.

mg – The abbreviation for "milligram" (thousandth of a gram).

OCCUPANT – A person who inhabits a dwelling unit.

OWNER – A person, firm, corporation, nonprofit organization, partnership, government, guardian, conservator, receiver, trustee, executor, or other judicial officer, or other entity which, alone or with others, owns, holds, or controls the freehold or leasehold title or part of the title to property, with or without actually possessing it. The definition includes a vendee who possesses the title, but does not include a mortgagee or an owner of a reversionary interest under a ground rent lease.

PAINT REMOVAL – A method of abatement that permanently eliminates lead-based paint from surfaces.

PAINTED SURFACE TO BE DISTURBED – A paint surface that is to be scraped, sanded, cut, penetrated or otherwise affected by rehabilitation work in a manner that could potentially create a lead-based paint hazard by generating dust, fumes, or paint chips.

PAINT STABILIZATION – Repairing any physical defect in the substrate of a painted surface that is causing paint deterioration, removing loose paint and other material from the surface to be treated, and applying a new protective coating or paint.

PAINT TESTING – The process of determining, by a certified lead-based paint inspector or risk assessor, the presence or the absence of lead-based paint on deteriorated paint surfaces or painted surfaces to be disturbed or replaced.

PERMANENT – An expected design life of at least 20 years.

PORCH, OPEN – A roofed open structure projecting from the exterior wall of a building and having at least 70% of the total area of the vertical planes forming its perimeter unobstructed in any manner except by insect screening between floor and ceiling.

REDUCTION – Measures designed to reduce or eliminate human exposure to lead-based paint hazards through methods including interim controls and abatement.

REHABILITATION – The improvement of an existing structure through alterations, incidental additions or enhancements. Rehabilitation includes repairs necessary to correct the results of deferred maintenance, the replacement of principal fixtures and components, improvements to increase the efficient use of energy, and installation of security devices.

RENOVATION, REPAIR AND PAINTING RULE (RRP) CERTIFICATION – EPA-required certification for all home improvements contractors, property management firms, handymen or others compensated for renovation work that involves window replacement or that disturbs more than six square feet of interior and/or 20 square feet of exterior paint or surface coating in pre-1978 residential housing and child-occupied facilities. This EPA requirement also applies to landlords working on rental properties. The individual must complete training, use safe work practices and verify that the work area is clean after

completion of renovations.

REPLACEMENT – A strategy of abatement that entails the removal of building components that have surfaces coated with lead-based paint and the installation of new components free of lead-based paint.

RESIDENTIAL PROPERTY – A dwelling unit, common areas, building exterior surfaces, and any surrounding land, including outbuildings, fences and play equipment affixed to the land, belonging to an owner and available for use by residents, but not including land used for agricultural, commercial, industrial or other non-residential purposes, and not including paint on the pavement of parking lots, garages, or roadways.

RISK ASSESSMENT –

A. An on-site investigation to determine the existence, nature, severity, and location of lead-based paint hazards; and

B. The provision of a report by the individual or firm conducting the risk assessment explaining the results of the investigation and options for reducing lead-based paint hazards.

TENANT – The individual named as the lessee in a lease, rental agreement or occupancy agreement for a dwelling unit.

ug – the abbreviation for "microgram" (millionth of a gram).

VISUAL ASSESSMENT – A visual examination of all surfaces within the dwelling unit, including any basement and/or attic as per the definition of a dwelling unit. A visual assessment shall not be considered to be complete if the examining individual is locked out or otherwise prevented from inspecting any room or space within the dwelling unit. For the purpose of determining whether or not a deteriorated paint violation is interior or exterior as it related to windows, in addition to that portion of the window component that faces the interior, all exterior-facing portions of the window component, with the exception of the exterior frame or trim, are considered to be interior.

WET SANDING or WET SCRAPING – A process of removing loose paint in which the painted surface to be sanded or scraped is kept wet to minimize the dispersal of paint chips and airborne dust.

WINDOW TROUGH – The area between the interior window sill (stool) and the storm window frame. If there is no storm window, the window trough is the area that receives both the upper and lower window sashes when they are both lowered.

WIPE SAMPLE – A sample collected by wiping a representative surface of known area, as determined by §54-7, with an acceptable wipe material as defined in ASTM E 1792, "Standard Specification for Wipe Sampling Materials for Lead in Surface Dust."

WORKSITE – An interior or exterior area where lead-based paint hazard reduction activity takes place. There may be more than one worksite in a dwelling unit or at a residential property.

Section 54-3 **Presumptions and obligations.**

A. For purposes of this article, all paint on the interior or exterior of any residential building on which the original construction was completed prior to January 1, 1978, shall be presumed to be lead-based.

B. For purposes of this article, all paint on the exterior of any nonresidential structure on which the original construction was completed prior to January 1, 1978, shall be presumed to be lead-based.

C. Any person seeking to rebut these presumptions shall establish through the means set forth in §54-6 that the paint on the building or structure in question is not lead-based paint.

D. Residential buildings shall be maintained free of lead-based paint hazards.

Section 54-4 **Violations.**

A. Deteriorated paint violation. The interior and exterior of any residential building on which the original construction was completed prior to January 1, 1978, and the exterior of any nonresidential structure on which the original construction was completed prior to January 1, 1978, shall be maintained in a condition such that the paint thereon does not become deteriorated paint, unless the deteriorated paint surfaces total no more than:

(1) Twenty square feet on exterior surfaces;

(2) Two square feet in any one interior room or space; or

(3) Ten percent of the total surface area on an interior or exterior type of component with a small surface area. Examples include windowsills, baseboards, and trim.

For the purpose of determining whether or not a deteriorated paint violation is interior or exterior as it relates to windows, in addition to that portion of the window component that faces the interior, all exterior-facing portions of the window component, with the exception of the exterior frame or trim, are considered to be interior.

B. Bare soil violation. Bare soil shall not be present within the dripline of any

residential building on which the original construction was completed prior to January 1, 1978.

C. Dust-lead hazard violation. A dust-lead hazard shall be identified and cited in accordance with the procedures set forth in §54-5, Inspection for violations.

D. Dust sample violation. A dust sample violation shall be cited upon a failure by an owner of a property to timely cause dust samples to be taken and certified test results to be submitted to the Department in accordance with the procedures set forth in §54-5 and 54-7 of this article.

Section 54-5 **Inspections for violations.**

(a) All inspections, including, but not limited to, inspections performed as part of an application for a certificate of compliance pursuant to Section 27-15 of the Property Conservation Code of the City of Syracuse, an application for a rental registry certificate pursuant to Section 27-131 of the Property Conservation Code of the City of Syracuse, or based upon the filing of a complaint, shall include a visual assessment for deteriorated paint and bare soil violations. With respect to units in structures containing five or fewer units and located in the high-risk area identified by the Mayor or the Mayor's designee, when the visual assessment identifies no interior deteriorated paint violation, the owner shall cause dust samples to be taken and certified test results to be obtained in accordance with the protocols established in §54-7B to determine whether a dust-lead hazard exists. For the purpose of determining whether or not a deteriorated paint violation is interior or exterior as it relates to windows, in addition to that portion of the window component that faces the interior, all exterior-facing portions of the window component, with the exception of the exterior frame or trim, are considered to be interior. The owner shall be given 60 days to cause the dust samples to be taken and to submit all certified test results to the Department. If all certified results are not submitted within the specified time, a dust sample violation shall be cited. When a dust-lead hazard is identified and not cleared, a dust-lead hazard violation shall be cited. A certification of clearance as described in §54-7 shall be required in order to clear a dust-lead hazard violation. The high-risk area to be identified by the Mayor or the Mayor's designee shall be based on relevant factors, including, but not limited to, the use of the Neighborhood Revitalization Strategy Area and the County Health Department inspections data in conjunction with its elevated blood-lead level inspections. Where the filing of a complaint leads to an inspection, the inspection shall include the unit which is the focus of the complaint and all common areas.

Section 54-6 **Remedy for violations.**

(a) Following a visual assessment which results in the citation of a deteriorated paint violation, the violation may be removed only by one of the following methods:

A. Certification by a lead-based paint inspector or risk assessor that the property has

been determined through a lead-based paint inspection conducted in accordance with the federal regulations at 40 CFR 745.227(b) not to contain lead-based paint.

B. Certification by a lead-based paint inspector or risk assessor that all cited violations of §54-4, Violations, have been abated, or interim controls implemented, and clearance has been achieved in accordance with standards found in §54-7; provided, however, that the property has been inspected pursuant to those standards since the deteriorated paint or dust-lead hazard violation was last cited, including a full visual assessment.

C. Where exterior deteriorated paint violations, including deteriorated paint violations on an open porch, and/or bare soil violations are cited, or where interior deteriorated paint violations are cited in a common area, as per the definition of a "dwelling unit," clearance may be established through a visual assessment by a City inspector after reduction measures have been implemented.

Section 54-7 **Standards for clearance examination and report.**

The remedy available through §54-6B and the dust sampling required by §54-5 shall require the following certification of clearance standards:

A. Qualified personnel. Certification of clearance shall be issued by:

(1) A certified risk assessor; or

(2) A certified lead-based paint inspector; or

(3) In instances of non-abatement clearance only, a lead dust sampling technician may provide a certification of clearance if their report has been approved by a certified risk assessor or certified lead-based paint inspector.

B. Required activities.

(1) An examination shall include a full visual assessment, dust sampling, submission of samples for analysis for lead, interpretation of sampling results, and preparation of a report. Examinations shall be performed in all dwelling units in accordance with this section.

(2) A full visual assessment of every area of the subject dwelling unit shall be performed to determine if deteriorated paint and/or visible amounts of dust, debris, paint chips or other residue are present. Interior painted surfaces shall be examined for the presence of deteriorated paint. If deteriorated paint and visible dust, debris, paint chips or residue are present, they must be eliminated prior to the continuation of the clearance examination.

(3) Dust samples shall be wipe samples and shall be taken on floors, excluding

open porches, and interior windowsills and window troughs that have a paint history. Dust samples shall be collected and analyzed in accordance with this section.

(a) Dust samples shall be taken from each of no more than four rooms. The selection of rooms to be tested, where applicable, shall include no less than one bedroom and the living room. At least one wipe sample shall be taken from a window trough or a windowsill with a paint history, if present, and one from a floor in each room. Where there are less than four rooms, then all rooms shall be sampled.

(b) Dust samples shall be collected by persons authorized and/or certified by the EPA as a lead inspector, risk assessor, dust wipe technician, or lead dust sampling technician whose approval to conduct such dust wipe tests in the City is not subject to suspension or revocation after a finding of non-responsibility pursuant to §54-7I.

(c) The method for collecting dust samples shall include:

[1] Laying out the sample area by using a template or tape to outline the area;

[2] Label each tube with its own identification number to be recorded on the sample collection form;

[3] For each sample, put on unused, nonlatex, non-sterile, powder-free disposable gloves which, after being properly worn on the hand, are only permitted to come into contact with an unused wipe;

[4] Use an unused wipe to sample the entire area inside the template or tape as follows:

[a] Starting in the upper corner of the sample area, use a side-to-side motion, wiping the entire area, pressing firmly with your fingers;

[b] Fold the wipe sample in half, dirty side in;

[c] With the clean side of the sample and starting at the upper corner, use a top-to-bottom motion, wiping the entire area, pressing firmly with your fingers;

[d] Fold the wipe sample in half again, dirty side in;

[e] With the clean side of the sample, wipe around the

entire perimeter, cleaning the corners, fold the sample; and

[f] Place the folded wipe sample in the tube.

[5] Write down the measurements of the sample area on the collection form;

[6] Clean the sampling equipment after each wipe sample is taken;

[7] Forward wipe samples to an authorized laboratory.

(d) Dust samples shall be analyzed by a laboratory recognized by the EPA pursuant to Section 405(b) of TSCA as being capable of performing analysis for lead compounds in dust samples.

C. Report. The clearance examiner shall ensure that an examination report is prepared that provides documentation of the examination.

(1) The report shall include the following information:

(a) The address of the residential property and, if only part of a multifamily property is affected, the specific dwelling units and common areas affected;

(b) The date(s) of the examination;

(c) The name, address, and signature of each person performing the examination, including their EPA certification number;

(d) The results of the visual assessment for the presence of deteriorated paint and visible dust, debris, residue or paint chips;

(e) The results of the analysis of dust samples, in ug per square foot, by location of sample; and

(f) The name and address of each laboratory that conducted the analysis of the dust samples, including the identification number for each such laboratory recognized by the EPA under Section 405(b) of the Toxic Substances Control Act [15 U.S.C. §2685(b)].

D. Clearance standards. Where dust sampling is required by §54-5 or where an interior deteriorated paint or dust-lead hazard violation has been cited in a dwelling unit, the following dust-lead standards shall be met before a certificate of compliance may be issued or a violation removed.

(1) Dust sample results shall be less than the following standard, unless the EPA establishes a more stringent standard in the Toxic Substances Control Act [40 C.F.R. § 745.65], in which case the more stringent standard shall be applied:

(a) For floors: 10 ug/ft^2;

(b) For windowsills: 100 ug/ft^2; and

(c) For window troughs: 400 ug/ft^2;

(2) Where dust sample results are greater than or equal to the levels set forth in §54-6D(1), additional dust wipe samples shall be taken in the subject areas until all said areas are found to be below the listed thresholds.

E. Validity of wipe test results. For the purposes of meeting the requirement in §54-5, the results of all successful wipe tests shall be valid for a period of three years, unless a subsequent inspection of the dwelling unit identifies an interior deteriorated paint violation, which would immediately cause the previous wipe tests results to be invalid.

F. Requirement to avoid conflict of interest regarding clearance inspection. All examinations shall be performed by persons or entities independent of those performing hazard reduction or maintenance activities.

G. This section shall not apply to the situations set forth in §54-6C.

H. As part of the Department's efforts to ensure consistency and compliance with the required clearance standards, random audits will be performed on all third-party lead clearance providers. Nonrandom audits may also be performed based on a reasonable suspicion that a third-party lead clearance provider is not providing proper tests, including, but not limited to, complaints received about the provider or about a specific property inspected by the provider. If the results indicate noncompliance with these standards, the Director may take whatever action is necessary as set forth in Subsection I of this section.

I. Rejection of clearance examination report/non-responsibility of issuer:

(1) The Director, or the Director's designee, is authorized to reject a lead clearance examination report that does not meet the requirements set forth herein or that is found after an inspection to not substantially represent the conditions present at the premises for which the report was prepared. The reasons for the rejection shall be set forth in writing to the issuer of the report and to the owner of the property to which the report pertains.

(2) No lead clearance examination report shall be accepted from an issuer who does not meet the qualifications set forth herein or who has been found by the Director or the Director's designee to be non-responsible.

(3) The Director shall inform an issuer in writing of a non-responsibility determination and the reasons therefor.

(4) Upon making a non-responsibility determination, the Director may bar the issuer and affiliated organizations, as further set forth herein, from submitting lead clearance reports to the City for a period of not to exceed three years. If a corporation is found to be a non-responsible issuer, that finding may be applied to a parent, affiliate or subsidiary corporation, if the Director finds that an officer, director or person directly or indirectly controlling 10% or more of the stock of the corporation found to be non-responsible is an officer, director or person directly or indirectly controlling 10% or more of the stock of the parent, affiliate or subsidiary corporation. If an unincorporated association is found to be non-responsible, that finding may be extended to other related associations upon a finding by the Director that the related associations have substantially the same ownership, management or operating personnel.

(5) Guidelines for non-responsibility determinations. In determining the non-responsibility of an issuer, the Director shall consider:

(a) The record of performance of the issuer, including but not limited to lack of adequate expertise, prior experience with lead clearance examinations or lack of ability to perform the clearances in a timely, competent and acceptable manner. Evidence of such a lack of ability to perform may include, but shall not be limited to, evidence of suspension or revocation for cause of any professional license of any director or officer or any holder of 5% or more of the issuer's stock or equity; suspension or debarment by the state or federal government; or a history of lead clearance examinations that do not meet federal, state or City requirements.

(b) The record of integrity of the issuer.

(c) The availability to the issuer of the necessary organization, experience, operational controls and technical skills, and the necessary technical equipment and facilities required for performance of the clearance examinations.

(d) The compliance by the issuer with any special or general standards of responsibility.

(e) The compliance by the issuer with standards which may be established by the Director pursuant to rule or regulation.

(f) Criminal conduct in connection with lead clearance examinations, government contracts or business activities. Evidence of such conduct may include a judgment of conviction or information obtained as a result of a formal grant of immunity in connection with a criminal prosecution of the issuer, any director or officer, or holder of 5% or more of the shares or equity of the issuer or any affiliate of the issuer.

(g) Violations of the Labor Law.

(h) Violations of the Environmental Conservation Law or other federal or state environmental statutes or regulations.

(i) Any other cause of so serious or compelling a nature that it raises questions about the responsibility of an issuer, including, but not limited to, submission to the City of a false or misleading statement in connection with a lead clearance examination.

(j) In addition to the factors specified above, the Director may also give due consideration to any other factors considered to bear upon issuer responsibility, including, but not limited to, any mitigating factors brought to the City's attention by the issuer.

(6) The Director may develop rules and regulations to implement these guidelines and may request a sworn statement of issuer qualifications to gather the necessary information set forth herein. The Director may use the information contained in the response to the sworn statement in making a determination of issuer non-responsibility.

(7) A non-responsibility determination by the Director may be appealed by the issuer to the Commissioner by delivery to the Commissioner of a written notice of appeal within 10 days after receipt of the determination of the Director. The Commissioner shall offer the issuer an opportunity to be heard, at which a hearing officer appointed by the Commissioner who is not a City employee shall preside. Such hearing shall be scheduled as soon as possible after a request. The issuer shall be permitted to be represented by counsel, to submit evidence and summon witnesses on his or her behalf and to inspect documents and cross-examine opposing witnesses. Compliance with the technical rules of evidence shall not be required. The hearing officer shall make a recommendation to the Commissioner. The Commissioner shall make the final determination in writing, based upon evidence produced at the hearing. In the final determination, the Commissioner may accept, reject or modify the determination and/or penalty

imposed by the Director. The determination of the Commissioner shall be the final determination of the City and shall be subject to review pursuant to Article 78 of the Civil Practice Law and Rules.

Section 54-8 **Lead-safe hazard reduction and control.**

A. No person shall disturb or remove lead-based paint or in any other way generate excessive dust or debris during work on the interior or exterior of any existing building or structure except in accordance with the requirements of this section and §54-9 and 54-10. Any home improvement contractor, property management firm, handyman or other person engaging in renovation work that involves window replacement or that disturbs more than six square feet of interior, and/or more than 20 square feet of exterior, paint or surface coating, in a residential building or child-occupied facility for which the original construction was completed prior to January 1, 1978, must possess an EPA RRP certification and be employed by an EPA certified firm.

B. Exemptions. This section shall not apply to activities that disturb or remove paint where the activities are being performed on buildings on which construction was completed on or after January 1, 1978.

C. Sign required when exterior lead-based paint (or presumed lead-based paint) is disturbed.

(1) Not later than the commencement date of any lead-based paint hazard reduction work, the owner, or the contractor when the owner has entered into a contract with a contractor to perform such work on the exterior of a building or structure, shall post signs in a location or locations clearly visible to the adjacent properties stating the following:

LEAD-BASED PAINT HAZARD REDUCTION WORK IN PROGRESS

PUBLIC ACCESS TO WORK AREA PROHIBITED

POSTED IN ACCORDANCE WITH CHAPTER 54 OF THE CITY OF SYRACUSE CODE

FOR FURTHER INFORMATION, PHONE (315) 448-8695

(2) The sign required by Subsection C(1) shall be not less than 24 inches square and shall be in large boldface capital letters no less than 1/2 inch in size, and shall contain the notification in both English and Spanish. The sign required by this subsection shall remain in place until the lead-based paint hazard reduction work has been completed.

(3) Where it is not possible to post signs in a conspicuous location or locations

clearly visible to the adjacent properties, the owner or, where the owner has entered into a contract with a contractor to perform lead-based paint hazard reduction work, the contractor shall provide the notice in written form, such as a letter or memorandum, to the occupants of adjacent properties.

D. Notice to tenants. Where lead-based paint hazard reduction work is to be performed on the interior or exterior of buildings occupied by one or more tenants, not less than three business days before any lead-based paint hazard reduction work is to commence the owner shall provide the following information:

(1) Contents of notice. Provide written notice to tenants of the building on which the work is being performed that lead-based paint hazard reduction work is being performed. This notice, which shall be in both English and Spanish, shall be in compliance with the EPA pre-renovation notification rules set forth in 40 CFR Part 745, Subpart E, shall be in the form of a sign, letter or memorandum, and shall prominently state the following:

Work is scheduled to be performed beginning _____ (date) on this property that may disturb or remove lead-based paint. The persons performing this work are required to follow federal and local laws regulating work with lead-based paint. You may obtain information regarding these laws, or report any suspected violations of these laws, by calling the City of Syracuse at _____ (a number to be designated by the City). The owner of this property is also required to provide tenants with a copy of the lead hazard information pamphlet. Retaliatory action against tenants is prohibited by §54-13 of the Municipal Code.

(2) The owner shall provide all tenants in the building with a copy of the lead hazard information pamphlet.

E. Notice by contractor. Where lead-based paint hazard reduction work is being performed by a contractor on residential property, the contractor shall, at least three business days prior to the commencement of such work, notify the property owner of potential lead hazards during the project by delivering to the owner a copy of the lead hazard information pamphlet.

F. Early commencement of work by owner. A property owner may commence, or may authorize a contractor to commence, lead-based paint hazard reduction work less than three business days after providing notices required above when such work must be commenced immediately to correct an emergency condition, such as work necessitated by non-routine failures of equipment, that were not planned but result from a sudden, unexpected event that, if not immediately attended to, presents a safety or public health hazard, or threatens equipment and/or property with significant damage.

G. Early commencement of work requested by tenant. Upon written request of a

tenant, an owner may commence, or authorize a contractor to commence, lead-based paint hazard reduction work on that tenant's unit less than three business days after providing notices required in Subsection E above.

Section 54-9 **Occupant protection; worksite preparation.**

A. Occupant protection.

(1) Occupants shall not be permitted to enter the worksite during hazard reduction activities (unless they are employed in the conduct of these activities at the worksite) until after hazard reduction work has been completed and clearance has been achieved.

(2) Occupants shall be temporarily relocated during hazard reduction activities and until a clearance examination has been successfully completed on the occupant's unit, and occupants who relocate to a unit not owned by their landlord shall not be liable for rent accruing during that time, except that relocation shall not be necessary if:

(a) Treatment will not disturb lead-based paint, dust-lead hazards or soil-lead hazards;

(b) Only the exterior of the dwelling unit is treated, and windows, doors, ventilation intakes and other openings in or near the worksite are sealed during hazard control work and cleaned afterward, and entry free of dust-lead hazards, soil-lead hazards and debris is provided;

(c) Treatment of the interior will be completed within one period of eight daytime hours, the worksite is contained so as to prevent the release of leaded dust and debris into other areas, and treatment does not create other safety, health or environmental hazards (e.g., exposed live electrical wiring, release of toxic fumes, or on-site disposal of hazardous waste); or

(d) Treatment of the interior will be completed within 15 calendar days, the worksite is contained so as to prevent the release of leaded dust and debris into other areas, treatment does not create other safety, health or environmental hazards, and, at the end of the work on each day, the worksite and the area within at least 10 feet of the containment area is cleaned to remove any visible dust or debris, and occupants have safe daily access to sleeping areas and bathroom and kitchen facilities.

(3) The dwelling unit and the worksite shall be secured against unauthorized entry and occupants' belongings protected from contamination by dust-lead hazards and debris during hazard reduction activities. Occupants'

belongings in the containment area shall be relocated to a safe and secure area outside the containment area, or covered with an impermeable covering with all seams and edges taped or otherwise sealed.

(4) In addition to protections afforded elsewhere by law, if interior hazard reduction activities will not be or are not completed within 60 calendar days, or if a dwelling unit fails to pass a clearance examination after the completion of interior hazard reduction activities, occupants shall have the right to terminate their lease and shall have no further obligation to pay rent under that rental agreement; provided, however, that this subsection shall not relieve the occupant of the obligation to pay any previously accrued rent for which he or she is otherwise liable.

B. Worksite preparation.

(1) The worksite shall be prepared, including the placement of containment barriers, to prevent the release of leaded dust and contain lead-based paint chips and other debris from hazard reduction activities within the worksite until they can be safely removed. Practices that minimize the spread of leaded dust, paint chips, soil and debris shall be used during worksite preparation.

(2) A warning sign, as defined in §54-9C, shall be posted at each entry to a room where hazard reduction activities are conducted when occupants are present or at each main and secondary entryway to a building from which occupants have been relocated. Each warning sign shall be posted irrespective of employees' lead exposure and, to the extent practicable, provided in the occupants' primary language.

Section 54-10 **Safe work practices.**

A. Lead-based paint shall not be applied to any exterior or interior surface.

B. Prohibited methods. The following methods of paint removal shall not be used:

(1) Open flame burning or torching.

(2) Machine sanding or grinding without a high-efficiency particulate air (HEPA) local exhaust control.

(3) Abrasive blasting or sandblasting without HEPA local exhaust control.

(4) Heat guns operating above 1,100° F. or charring the paint.

(5) Dry sanding or dry scraping, except dry scraping in conjunction with heat guns or within 1.0 foot of electrical outlets, or when treating defective paint

spots totaling no more than 2 square feet in any one interior room or space, or totaling no more than 20 square feet on exterior surfaces.

(6) Paint stripping in a poorly ventilated space using a volatile stripper that is a hazardous substance in accordance with regulations of the Consumer Product Safety Commission at 16 CFR 1500.3, and/or a hazardous chemical in accordance with the Occupational Safety and Health Administration regulations at 29 CFR 1910.1200 or 1926.59, as applicable to the work.

C. Worksite preparation. The worksite shall be prepared in accordance with §54-9B

D. Specialized cleaning. After hazard reduction activities have been completed, the worksite shall be cleaned using cleaning methods, products and devices that are successful in cleaning up dust-lead hazards, such as a HEPA vacuum or other method of equivalent efficacy, and lead-specific detergents or equivalent.

E. De minimis levels. Safe work practices are not required when maintenance or hazard reduction activities do not disturb painted surfaces that total more than:

(1) Twenty square feet on exterior surfaces;

(2) Two square feet in any one interior room or space; or

(3) Ten percent of the total surface area on an interior or exterior type of component with a small surface area. Examples include windowsills, baseboards, and trim.

Section 54-11 **Emergency actions; weather conditions.**

A. For emergency actions necessary to safeguard against imminent or immediate danger to human life, health or safety, or to protect property from further structural damage, including demolitions, occupants shall be protected from exposure to lead in dust and debris generated by such emergency actions to the extent practicable. This exemption does not apply to any work undertaken subsequent to or above and beyond such emergency actions, other than the demolitions noted above.

B. Performance of lead-based paint hazard reduction or lead-based paint abatement on an exterior painted surface as required under this article may be delayed for a reasonable time during a period when weather conditions render impossible the completion of conventional construction activities; provided, however, that this limitation shall continue only for the period in which work cannot be performed in the work-safe manner as provided for herein.

Section 54-12 **Exemptions.**

A. This article shall not apply to properties taken by a governmental entity in a

foreclosure proceeding which are vacant and secured and:

(1) Scheduled for demolition; or

(2) Scheduled for sale within 12 months.

B. The requirements of §54-4 through §54-7 which are applicable to residential buildings shall not include single-family owner-occupied dwellings.

C. A building complex with 10 or more units, any housing development or complex designated for seniors, and all studio apartments shall be exempt from the requirements for dust sampling established in §54-5. A "building complex" for the purposes of this section includes any proximately related grouping or combination of units or buildings that is structured under a single ownership or management contract, regardless of whether such buildings are contiguous. This exemption does not exempt a property from a dust sampling required by any other local, state, or federal law or regulation.

Section 54-13 **Prohibition of retaliatory action.**

A. It is unlawful for an owner, or any person acting on his or her behalf, to take any retaliatory action toward a tenant who reports a suspected lead-based paint hazard to the owner, the City, the Onondaga County Health Department and their medical practitioner. Retaliatory actions include but are not limited to any actions that materially alter the terms of the tenancy (including rent increases and non-renewals) or interfere with the occupants' use of the property, or any other action provided under New York Real Property Law § 223-b .

B. There shall be a rebuttable presumption that any attempt by the owner to raise rents, curtail services, refuse to renew or attempt to evict a tenant within one year of any report to the City or the owner or any enforcement action in connection with a suspected lead hazard is a retaliatory action in violation of this section, except that in instances of nonpayment of rent or commission of waste upon the premises by the tenant no such presumption shall apply. After one year form the date of the reporting of a suspected lead hazard, or the most recent activity related to any enforcement action, the defense of retaliatory eviction shall remain available to the tenant, but without the benefit of the presumption created by this section.

C. The provisions of this section shall not be given effect in any case in which it is established that the condition from which the complaint or action arose was caused by the tenant, a member of the tenant's household, or a guest of the tenant; nor shall it apply in a case where a tenancy was terminated pursuant to the terms of a lease as a result of a bona fide transfer of ownership.

Section 54-14 **Notification to county of violations.**

The City shall continue to send notices to the County of Onondaga listing any health and safety violations found in properties inspected by the City. Any violation of §54-4 shall be included on that list.

Section 54-15 **Database for properties.**

A. The City shall maintain a database, accessible to the public, of all residential properties where lead hazards have been identified, reduced and controlled with funds received by the City from the United States Department of Housing and Urban Development which require that such a database be maintained. The City shall further maintain a database of all residential properties granted a certificate of compliance after the effective date of this article.

B. The databases created pursuant to this section shall be kept available for "walk-in" inspection by the public. No person requesting access shall be required to complete a freedom of information request in order to view this database.

(Reserved)

(Reserved)

(Reserved)

(Reserved)

and

BE IT FURTHER ORDAINED, that this ordinance shall take effect immediately.

Appendix B

City of Syracuse

Neighborhood Revitalization Strategy Area Plan

City of Syracuse

Neighborhood Revitalization Strategy Area Plan

May 2011

City of Syracuse Dept. of Neighborhood & Business Development
233 E. Washington Street, Room 312
Syracuse, New York 13202

Executive Summary

Within the Community Development Block Grant (CDBG) program, a participating jurisdiction can designate specific areas or neighborhoods a Neighborhood Revitalization Strategy Area (NRSA). The NRSA allows greater flexibility in the use of Community Development Block Grant (CDBG) funding that would promote the revitalization of those specified areas.

The City of Syracuse has proposed two areas for consideration of an NRSA designation, the Northeast Area and the Southwest Area. The boundaries follow along the Syracuse Urban Renewal Area boundaries. The City of Syracuse will use the following benefits as a way to promote the revitalization of the Northeast and Southwest areas:

- Offer a Public Service Cap Exemption to those services carried out pursuant to the strategy by a Community-Based Development Organization (CBDO),
- Job creation and retention activities undertaken pursuant to the strategy will be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take, or are considered for, such jobs.
- Housing units assisted pursuant to the strategy can be considered to be part of a single structure for purposes of applying for low-and moderate-income national objective criteria, thus providing greater flexibility to carry out housing programs that revitalize a neighborhood.
- Economic development activities carried out under the strategy will be exempt from the aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing its record-keeping requirements.

The Northeast and Southwest areas are two areas plagued with many social and economic challenges. The Northeast area is characterized by a growing Asian immigrant population currently comprising 11.8% of the population with 12.4% being foreign born. Also the area struggles to attract and maintain homeowners as the current homeownership rate is only 27.1% compared to a 41.8% city-wide rate.

The Southwest area has been affected by different market forces resulting in an alarmingly high vacancy rate at 37.1% compared to a city-wide rate of just over 18%. Deep economic challenges have resulted in a 16.2% unemployment rate with nearly a third of the adult population without a high school diploma. Coupled with these challenges, children are also adversely affected with 62.6% of the children living below the poverty level.

Broad community objectives have been developed and key strategies are outlined in this plan to help improve the quality of life and transform these two areas into place where people desire to live, work and play. Key strategy areas include housing and neighborhood development, infrastructure, public safety, code enforcement, zoning and land use, and economic development. The desire to decrease violent crime, increase homeownership, and strengthen the neighborhood economic corridors are a small sample of objectives this plan is looking to achieve.

Purpose of a NRSA Plan

The U.S. Department of Housing and Urban Development (HUD) encourages the establishment of a Neighborhood Revitalization Strategy Area (NRSA) as a means to create communities of opportunity in distressed neighborhoods. The goals of these areas are to reinvest in human and economic capital, and economically empower low-income residents as part of an overall community revitalization strategy. Comprehensive community revitalization strategies seek to create partnerships among federal and local governments, the private sector, community organizations and neighborhood residents.

The City of Syracuse proposes two NRSA's that encompass two of the city's most distressed areas. Within the NRSA, the NBD is afforded much greater flexibility in the use of CDBG funds. As outlined in the following sections, the two proposed NRSA's meet the threshold for low-moderate income (LMI) residents and are primarily residential. This strategy has a five-year duration and is integrated into the Five Year Action Plan and Consolidated Annual Performance Evaluation Report as component of the City's Department of Neighborhood & Business Development (NBD) activities.

Benefits of a Neighborhood Revitalization Strategy

The City of Syracuse plans to take advantage of the following benefits an NRSA offers as described in amendments to the CDBG regulations at 24 CFR 570. They are as follows:

- **Public Service Cap Exemption:** Public Services carried out pursuant to the strategy by a Community-Based Development Organization (CBDO) will be exempt from the public service cap (24 CFR 570.204(b)(2)(ii)); and

- **Job Creation/Retention as Low/Moderate Income Area Benefits:** Job creation and retention activities undertaken pursuant to the strategy will be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take, or are considered for, such jobs (24 CFR 570.208(a)(1)(vii) and (d)(5)(i));and

- **Aggregation of Housing Units:** Housing units assisted pursuant to the strategy may be considered to be part of a single structure for purposes of applying for low- and moderate-income national objective criteria, thus providing greater flexibility to carry out housing programs that revitalize a neighborhood (24 CFR 570.208(a)(3) and (d)(5)(ii)); and

- **Aggregate Public Benefit Standard Exemption:** Economic development activities carried out under the strategy will be exempt from the aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing its record-keeping requirements (24 CFR 570.209 (b)(2)(v)(L) and (M)).

The strategy shall also be implemented in accordance with the civil rights-related program requirements stated in the Consolidated Plan rule at 24 CFR Part 91.

Components of the Neighborhood Strategy

The City's strategy for the NRSA describes how it meets the following criteria:

Boundaries: (Pages 3-4) The City has identified two strategy areas and the neighborhood boundaries for which the strategy applies. All areas within those boundaries must be contiguous. Please see NRSA map for more information.

Demographic Criteria: (Pages 5-7) The designated area is primarily residential and contains a percentage of low-and moderate-income residents that is equal to the "upper quartile percentage" (as computed by HUD pursuant to 24 CFR 570.208(a)(1)(ii) or 70 percent, whichever is less but, in any event, not less than 51 percent.

Consultation: (Page 8) The City has described how the strategy was developed in consultation with the area's stakeholders, including residents, owners/operators of businesses and financial institutions, non-profit organizations, and community groups that are in or serve the areas.

Assessment & Economic Empowerment: (Pages 9-33) The City's strategy includes an assessment of the economic conditions of the area and an examination of the opportunities for economic development improvement and the problems likely to be encountered. Maps illustrating current conditions are included as Appendices—pages 38-58.

Each subject-specific assessment is followed by a development strategy and implementation plan to promote the area's economic progress focusing on activities to create meaningful jobs for the unemployed and low-and moderate-income residents of the area (including jobs created by HUD-assisted efforts) as well as activities to promote the substantial revitalization of the neighborhood.

Performance Measurements: (Page 34-37) The strategy must identify the results (i.e., physical improvements, social initiatives and economic empowerment) expected to be achieved, expressing them in terms that are readily measurable. This will be in the form of "benchmarks."

Performance Reporting: NBD will report on the progress of the NRSA at the end of each Fiscal Year along with the annual report of the Consolidated Plan. This document is known as the Consolidated Annual Performance Evaluation Report (CAPER).

History & Background

The City of Syracuse is located in the geographic center of New York State and is the county seat of Onondaga County. Once accessed by the Erie Canal, the city now lies at the crossroads of the New York State Thruway and Interstate 81. It is the region's major employment center, home to businesses' headquarters, hospitals, and universities that attract people from throughout Central New York. Downtown Syracuse serves as the cultural and social center of the area, with restaurants, theaters, museums, sports arenas, and civic spaces. The city's neighborhoods are unique, vibrant places to live, with walkable business districts and access to the city's extensive park system and neighborhood schools.

Syracuse, like many Northern "Rust Belt" cities, has experienced a large decline in population since the 1950s. The city's population peaked in 1950 at 220,000, and over the next few decades people left the city by the tens of thousands, moving to newly developed, surrounding suburbs or out of the area entirely. This trend continues today, although the most recent Census data shows it has begun to level off. The city now has a population of 145,170, a decline of just 1.5 percent since 2000[1].

As people left the city, they often left behind homes that became vacant and neglected. This is especially true in the neighborhoods included in the Neighborhood Revitalization Strategy Area. In many cases, the people who remained in the city did not have the means to keep their homes up, which also contributes to the general deterioration of the housing stock in these neighborhoods. The Southwest NRSA in particular is plagued by a large number of vacant houses, businesses, and lots. In contrast, the Northeast NRSA—which has actually gained population since 2000 and experienced an increasing flow of Asian and African immigrants since the 1980s—has less vacancy, but faces major issues with housing quality and code compliance in units owned by absentee landlords and homeowners unable to maintain their properties.

Despite the efforts of the City of Syracuse, in cooperation with neighborhood organizations, housing agencies, and other stakeholders, these NRSA neighborhoods continue to struggle with abandoned and ill-maintained property. While efforts have been made to maintain and rehabilitate old houses, as well as build new ones, the existing housing stock continues to age and deteriorate. Many existing businesses are struggling, and in many areas there is a lack of access to necessary goods and services, especially for those without access to a vehicle. Furthermore, the declining property values and tax base that has resulted makes it difficult for the City to maintain adequate level of services to its reduced population. People continue to move to the suburbs or leave the area entirely, further exacerbating this problem.

But Syracuse has, in recent years, turned a corner. Population decline has leveled off, and many people, including young professionals, artists, and retirees, are rediscovering the city as a great place to live, work, and play. Targeted public and private investment has spurred a renaissance in areas such as Downtown and the Near Westside. The market-rate

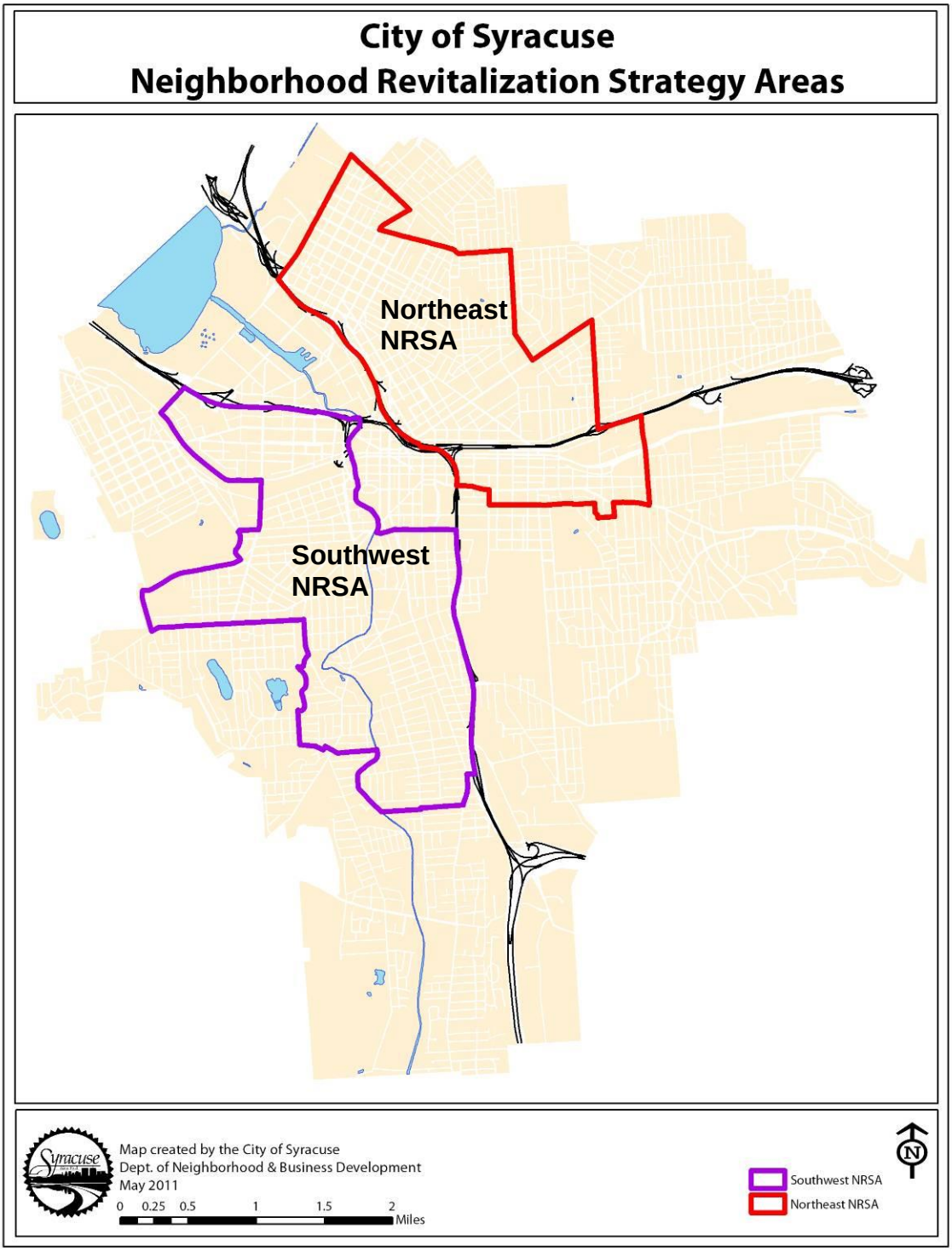
[1] 2010 U.S. Census

residential market downtown continues to expand and many walkable neighborhoods support stable and increasing housing values. Likewise, the creation of a Neighborhood Revitalization Strategy Area will help target public investment and encourage private investment in areas that need an extra push, which will lead to the revitalization of the entire area. These areas have the potential for walkable, mixed-use development that has proven popular elsewhere in the city and throughout the country. Most were initially designed so that their residents were within walking distance of commercial corridors and retain unique architectural streetscapes with potential for rehabilitation.

Using the tools provided by the NRSA, and with the cooperation of various government agencies, business groups, neighborhood organizations, and housing agencies, the City of Syracuse can help these neighborhoods reach their fullest potential and become true neighborhoods of choice.

Boundaries

In order to better serve the needs of specific areas of the city, the City of Syracuse has identified two proposed Neighborhood Revitalization Strategy Areas (NRSAs), the Northeast NRSA and the Southwest NRSA.



Northeast NRSA

The Northeast strategy area covers much of the north and northeast sides of the city, including all or part of the following neighborhoods: Court-Woodlawn, Washington Square, Northside, Prospect Hill, Hawley-Green, Lincoln Hill, Sedgwick, and Near Eastside. The area coincides with the following U.S. Census tracts and block groups:

2-1	14-1	23-1
2-2	14-2	23-2
5.01-1	14-3	24-1
6-1	15-1	24-2
6-2	15-2	34-1
6-3	16-1	34-2
7-1	16-2	35-2
7-2	16-3	35-3
8-1	17.01-1	
8-2	17.01-2	

A detailed map of the Northeast strategy area is included as Appendix A.

Southwest NRSA

The Southwest strategy area covers much of the west, southwest, and south sides of the city, including all or part of the following neighborhoods: Park Ave., Near Westside, Skunk City, Southwest, Southside, Elmwood, and Brighton. The area coincides with the following U.S. Census tracts and block groups:

21.01-1	40-2	53-3
21.01-2	42-1	54-1
22-1	42-2	54-2
30-1	42-3	54-3
30-2	51-1	54-4
38-1	51-2	58-1
38-2	51-3	58-2
39-1	52-1	58-3
39-2	52-2	59-1
39-3	52-3	59-2
39-4	53-1	
40-1	53-2	

Please see a detailed map of the Southwest strategy area is included as Appendix B.

Demographic Indicators

The combined Syracuse NRSA has a total population of 61,460, compared to the city's total population of 145,170[2]. The Northeast NRSA has a population of 33,150, and the Southwest NRSA has a population of 28,310.

As the chart below shows, the Northeast NRSA is 51.4 percent white (a decrease from 67.3 percent in 2000) and 26.6 percent black (an increase from 18.6 percent in 2000), with a Asian population of 11.8 percent (up from 6.4 percent in 2000).[3] In addition, 12.4 percent of residents in the Northeast NRSA are foreign-born.[4] This reflects the ongoing trends of white residents (many of whom are descendants of immigrants themselves) leaving the area for other neighborhoods or the suburbs (and beyond), and the influx of refugees and other immigrants into the area.

The Southwest NRSA, in contrast, is 60.2 percent black (an increase from 56.9 percent in 2000) and 25.1 percent white (a decrease from 30.4 percent in 2000), with 16.5 percent identifying as Hispanic.[5] This reflects the ongoing trend of white residents abandoning the inner-city neighborhoods of the south and west sides of the city. This data is mapped in Appendix C.

	Northeast NRSA	Southwest NRSA	Citywide
Total Population	33,150	28,310	145,170
Percent White	51.4%	25.1%	56.0%
Percent Black	26.6%	60.2%	29.5%
Percent Native	1.4%	1.3%	1.1%
Percent Asian	11.8%	0.3%	5.5%
Percent Pacific Islander	0.0%	0.0%	0.0%
Percent Other	2.3%	6.4%	2.7%
Percent More than One	6.4%	6.6%	5.1%
Percent Hispanic	8.3%	16.5%	8.3%

*2010 U.S. Census

This table demonstrates that while the city's total population decline has leveled off in the past decade, the population continues to shift. The white population has continued to decline, while the population of minorities and immigrants has held steady or increased. A more diverse city is certainly nothing to fear, but understanding why these trends are occurring is imperative for the NRSA plan to be effective.

As a result of population decline, loss of business and industry, and other economic conditions, including the recent recession, the city as a whole has struggled with high

[2] 2010 U.S. Census
[3] 2010 U.S. Census
[4] American Community Survey 2005-2009 Five Year Estimates
[5] 2010 U.S. Census

poverty rates and high unemployment. The neighborhoods in the NRSA have been hit especially hard by these economic factors.

Pervasive Poverty

Within the combined NRSA, the majority of residents are low-to-moderate income (LMI) and many live below the poverty line. The table below[6] outlines median household income, poverty rates, percent low/moderate income, adults over 25 years of age without a high school diploma, access to a private vehicle, unemployment rates, and households receiving public assistance/supplemental security income within each NRSA and the city as a whole.

Generally, these indicators show far more barriers to economic empowerment for individuals and households within the proposed NRSAs. Childhood poverty and educational achievement are closely linked, and lack of a high school diploma, makes it exceptionally difficult to find work and improve one's socio-economic standing, perpetuating the cycle of generational poverty. Similar barriers to economic empowerment are faced by households headed by single females, which are far likelier to fall below the poverty line. These issues are mapped in Appendix D.[7]

	Northeast NRSA	Southwest NRSA	Citywide
Median Household Income	$ 24,777.00	$ 22,830.00	$ 30,031.00
Poverty Rate	34.8%	45.6%	30.3%
Child Poverty Rate	51.1%	62.6%	59.9%
Low/Moderate Income Persons[8]	71.4%	78.4%	62.3%
Percent of Adults without a High School Diploma	29.4%	31.7%	20.3%
Percent of Households without access to a Vehicle	31.8%	39.7%	25.6%
Percent of Families that are Female-Headed	43.8%	59.2%	38.6%
Unemployment Rate	9.4%	16.2%	9.6%
Adults Not in the Labor Force	39.5%	44.2%	41.3%
Households Receiving Public Assistance/SSI	19.5%	26.6%	14.8%

*2005-2009 American Community Survey Estimates, U.S. Census

[6] 2005-2009 American Community Survey Estimates, U.S. Census.

[7] Note that several census tracts in the University Neighborhood are outliers due to students' reported income.

[8] Data from HUD Estimates. http://www.hud.gov/offices/cpd/systems/census/ny/index.cfm

Population Shifts

	Northeast NRSA 2010	2000	00-'10 %Change	**Southwest NRSA** 2010	2000	00-'10 %Change	**Citywide** 2010	2000	00-'10 %Change
Total Population	33,150	31,261	6.0%	28,310	30,341	-6.7%	145,170	147,306	-1.5%
Percent White	51.4%	67.3%	-15.9%	25.1%	30.4%	-5.3%	56.0%	64.3%	-8.2%
Percent Black	26.6%	18.6%	8.0%	60.2%	56.9%	3.3%	29.5%	25.3%	4.1%
Percent Native	1.4%	1.6%	-0.2%	1.3%	1.4%	-0.1%	1.1%	1.1%	0.0%
Percent Asian	11.8%	6.4%	5.4%	0.3%	0.4%	-0.1%	5.5%	3.4%	2.2%
Percent Pacific Islander	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent Other	2.3%	1.7%	0.6%	6.4%	5.6%	0.8%	2.7%	2.2%	0.5%
Percent More than One	6.4%	4.4%	2.0%	6.6%	5.2%	1.4%	5.1%	3.6%	1.5%
Percent Hispanic	8.3%	4.6%	3.7%	16.5%	11.7%	4.8%	8.3%	5.3%	3.0%

*2000 and 2010 U.S. Census

The table above illustrates increasing racial and ethnic segregation within the City of Syracuse, with specific minority groups focused in the NRSAs. The Northeast NRSA has received large numbers of Southeast Asian and African immigrants in the past decade, helping to fuel population growth on within the Northeast NRSA. The Latino population continues to grow on the city's Westside, within the Southwest NRSA. And white flight has continued to fuel population loss on the Southside. These trends are further reflected in the number of foreign-born persons and those who speak English "not well" or "not at all."

	Northeast NRSA	**Southwest NRSA**	**Citywide**
Percent Foreign-Born	12.4%	5.4%	8.9%
Percent over 5 who speak English "not well" or "not at all"	5.1%	4.1%	1.7%

*2005-2009 American Community Survey Estimates, U.S. Census

Community Consultation

The boundaries of the NRSA are very similar to those of the recently revamped Syracuse Urban Renewal Agency (SURA), which gives the City more flexibility and authority in implementing its redevelopment strategies. As part of the adoption of the SURA plan in 2010, the Department of Neighborhood & Business Development (NBD) outlined the contents of the SURA plan and the justification for establishing the SURA boundaries. Much like the NRSA, the adoption of SURA's plan identified a nearly coterminous area to that being proposed as an NRSA as a blighted area so that SURA might more flexibly address issues of declining property values and abandonment. During this process, NBD consulted with various community groups, including TNT (Tomorrow's Neighborhoods Today) groups, which act as neighborhood advisory committees, and other neighborhood organizations. The plan was also presented to the City's housing partners, including Home HeadQuarters, Jubilee Homes, Northeast Hawley Development Association (NEHDA), and Syracuse Model Neighborhood Corporation (SMNC). Community input was gathered on these strategies at this time.

Also in 2010, NBD developed and published the City's Housing Plan, the most proactive to date, which established the City's priorities for housing development and explained the various tools and activities the City will use to implement these priorities. As with SURA, this housing plan was presented to TNT groups throughout the city and then adopted by the Syracuse Common Council.

As the City begins to the implement its NRSA strategies, NBD will continue to consult with community groups, housing agencies, and other relevant stakeholders. These groups may include:

Danforth-Pond-Butternut Task Force
FOCUS (Forging Our Community's United Strength)
Home HeadQuarters
Housing Visions Unlimited
Interfaith Works Center for New Americans
Jubilee Homes of Syracuse, Inc.
La Liga (Spanish Action League)
Near Westside Initiative
Neighborhood Efforts West (NEW)
Northeast Hawley Development Association (NEHDA)
Northside UP (Urban Partnership)
Southeast Gateway Development Corporation
Syracuse Model Neighborhood Corporation (SMNC)
TNT Area 2 – Westside
TNT Area 3 – Southside
TNT Area 7 – Northside
Washington Square Task Force

Assessment & Empowerment Strategies

Housing & Neighborhood Development

Assessment

More than 85 percent of the 42,000 parcels in the City of Syracuse are residential in nature. There are roughly 25,000 single-family homes in the City and an additional 10,000 multi-unit residential structures housing approximately 56,000 households. Neighborhoods vary from urban—with high rise apartment and mixed-use buildings—to suburban in nature. Most residential neighborhoods in the NSRA are within walking distance of a commercial corridor and developed prior to 1900.

The population loss that Syracuse has sustained since the 1950s has resulted in a high rate of vacant residential and commercial buildings. The proposed NSRA areas have been hardest hit by economic decline population loss. Much of the housing stock in the NRSA, both owner occupied and rental properties, suffers from disinvestment and lack of maintenance.

The Southwest NRSA, which has experienced population loss over the past decade (see demographics section above), faces the most severe issues of property abandonment and vacant buildings and land in the city. More creative uses are needed for this vacant land and incentives are needed for private developers and homeowners to rehabilitate vacant and abandoned housing stock. SURA (addressed above) is one powerful tool to encourage this.

The Northeast NRSA has gained population over the past decade and is the most densely populated part of the city. Interestingly, there is a large demand for community garden and market garden space among immigrant groups, but the Northside does not possess the large parcels of vacant land found so frequently on the south and west sides of the city. This area still experiences a low home ownership rate. And low incomes among owner occupants, in addition to high numbers of absentee landlords contribute high numbers of code violations. This dense concentration of people does, however, provide a robust market for small businesses throughout the Northside (see Economic Development section below).

	Northeast NRSA	Southwest NRSA	Citywide
Number of households	13,223	9,567	55,945
persons/household	2.51	2.96	2.59
persons/acre	15.45	11.74	8.72

*2005-2009 ACS Estimates, U.S. Census

The lowest homeownership rates are also found in the NRSAs; and renters within the NRSAs generally pay a higher portion of their income for rent. See Appendix E for more data related to the city's housing stock and housing market.

	Northeast NRSA	Southwest NRSA	Citywide
Owner Occupancy Rate	27.1%	33.2%	41.8%
Renter Occupancy Rate	72.9%	66.8%	58.2%
Vacancy Rate	24.5%	31.7%	18.5%
Median Gross Rent	$ 654.00	$ 653.00	$ 662.00
Median Gross Rent/Income	38.5%	40.2%	37.1%

*2005-2009 ACS Estimates, U.S. Census

	Citywide	Northeast NRSA		Southwest NRSA		Combined NRSA	
Vacant residential structures	1524	372	24%	724	48%	1096	72%
Vacant commercial structures	194	69	36%	66	34%	135	70%
Vacant industrial structures	9	3	33%	3	33%	6	67%
Vacant lots	3665	598	16%	1741	48%	2339	64%

*City of Syracuse Assessment & Code Enforcement data (Jan. 2010)

Maintenance is also a challenge due to the advanced age of the housing stock. The average age of housing units in the NRSAs is higher than the city as a whole.

The Southwest NRSA has experienced the majority of demolitions in the city since the 1960s, resulting in a high number of vacant lots. See the map of vacant land and buildings in Appendix E for more detail. The City struggles to maintain abandoned vacant lots and buildings—the majority of which are located within the NRSA (see table above).

The City is responsible for the following operations, which can be used to empower residents of the NRSA to improve the quality of their neighborhoods: Housing & Neighborhood Development, Infrastructure, Public Safety, Code Enforcement, and Economic Development. These responsibilities are explained in detail below.

Housing Delivery Network

The housing delivery network in Syracuse is a network of key relationships between the community's Community Development Financial Institutions (CDFI), the local banking community, small neighborhood based community development corporations (CDC), non-profit and for-profit affordable rental developers and the City. This plan seeks to use Home HeadQuarters (HHQ) and the Syracuse Cooperative Federal Credit Union (SFCU), both Community Development Financial Institutions (CDFI's), to provide the liquidity needed by

the neighborhood Community Development Corporations (CDCs) to allow them to conduct the activities necessary for transforming the neighborhoods to which they are accountable. This liquidity allows flexibility throughout the development process that will be "taken out" by the permanent financing provided through the Community Development Block Grant (CDBG), HOME, and other state and federal resources administered by the NBD.

HHQ's CDFI status allows them to act as the City's primary lender of home improvement funds, while SFCU's CDFI status allows them to provide small business lending citywide. In addition to being the City's primary residential housing lender (60% of all residential lending in the City was through HHQ last year), HHQ also runs the NeighborWorks® America Homebuyer Education Center that provides 10-hour certified training sessions to over 500 prospective homebuyers each year, which allows graduates up to $3,000 in down payment and closing cost assistance when they do become homeowners. HHQ also provides post-purchase counseling in the form of foreclosure prevention. And while HHQ is first and foremost the City's primary residential lender, they also have significant planning capacity and real estate investments in the Near West Side, Prospect Hill, and Skunk City, among other places. HHQ is able to leverage its loan portfolio to attract lines of credit in the form of private capital that allows them to "front" money for development as long as commitments for permanent finance are provided.

HHQ currently has over $1 million dollars in construction financing on loan to all of the City's neighborhood housing agencies to allow them to acquire, rehabilitate and build housing that will be paid back through a combination of NDB grant sources and private mortgages obtained by the eventual homeowners that purchase these properties. The City needs to support this process by encouraging conventional lending institutions to increase the level of private capital available to HHQ to fuel both their own lending abilities as well as to allow them to expand this construction lending to the neighborhood housing developers.
Syracuse benefits from the series of longstanding neighborhood housing developers that have served their communities for more than three decades. These agencies have an identified target area that is currently underserved by the private market within which they operate. Residents and stakeholders make up a substantial proportion of the boards of these organizations and play key roles in determining its priorities.

This year NBD has formally qualified many of these agencies as Community Housing Development Organizations (CHDO's), Community Based Development Organizations (CBDO) or both. As all of these groups work specifically within the Southeast and Northwest NRSA, obtaining these designations allows these agencies to access certain HUD-funded set asides for both bricks and mortar funding as well as operating funds.

Empowerment Strategies

In 2010, the City of Syracuse published a Housing Plan that included principles for housing production and neighborhood development. These principles are:

- **Preserve:** Rejuvenation of Syracuse's housing stock through repair, improvement and rehabilitation of existing buildings.

- **Build:** Promotion of appropriate densities, and the diversification and improvement of the housing stock in the City of Syracuse through rehabilitation of existing housing stock and new construction.

- **Assist Households:** Encouragement of residents to remain in the City of Syracuse and invest in the upkeep and improvement of their homes.

- **Improve Image:** Promotion and enhancement the image of the City of Syracuse.

While these principles are applicable citywide, they are particularly relevant to the NRSA neighborhoods. To ensure that these principles are followed, the City has established the following housing objectives:

- Ensure adequate supply of decent, affordable housing options for homeowners and remove unnecessary barriers to homeownership

- Ensure adequate supply of decent affordable housing options for renters

- Assess and manage the growing number of vacant properties and reduce blight in the City

Below is a description of the housing programs the City has implemented or will implement in the NRSA to meet these objectives.

Objective:	Ensure adequate supply of decent, affordable housing options for homeowners and remove unnecessary barriers to homeownership.

Support Homebuyer Education and Foreclosure Prevention Counseling
Available housing requires homebuyers who are well information about the process of buying and maintaining and sustaining a home. Homebuyer education classes provide the information necessary to ensure potential homeowners make informed home buying decisions. Post purchase counseling and education/workshops, provided by professionals on topics such as maintenance assessment and repair; practical landscaping techniques and planning and budgeting create a support network for homeowner sustainability.

A challenged economic climate and warrants the need for ongoing foreclosure intervention services. Intervention to prevent foreclosure ensures sustained homeownership in neighborhoods avoiding the pitfall of increased vacant properties

Urgent Care Home Improvement Program
The City contracts with Home HeadQuarters Inc. to administer the Urgent Care Home Improvement Program. This program provides low to moderate income households with loan capital to make emergency repairs to their homes. The program is structured to offer an average loan amount of $10,000 per household. The City anticipates a minimum of 107

low-income homeowners assisted, many of them in the NRSA.

Down Payment & Closing Cost Assistance Program

The City contracts with Home HeadQuarters to administer the Down Payment and Closing Cost Assistance Program, which provides first-time homebuyers with a five (5) year deferred loan up to $3,000 for down payment and closing cost assistance (DPCCA). All program recipients are required to participate in Home HeadQuarters' NeighborWorks America-certified Homebuyer Education Course and are encourage to receive their HUD-certified housing counseling services to assure, to the extent possible, that the first-time homebuyers have the requisite knowledge to be successful in the home buying process and experience long-term homeownership retention. The city anticipates providing 100 first-time homebuyers with DPCCA, many of them in the NRSA.

Syracuse Housing and Rehabilitation Program (SHARP)

The City contracts with Home HeadQuarters to administer SHARP. The program provides a grant for homeowners of up to $1,000 for minor and preventative home repairs and requires the applicant make a 10 percent cash match. Home HeadQuarters contracts with various neighborhood based agencies to assist with administering the program including housing partners Jubilee Homes, NEHDA, and Southeast Gateway, all located in the NRSA. The City anticipates providing 125 low-to-moderate income households with the SHARP grant, with the majority of these going to households in the NRSA.

Tax Incentives

The City will fully utilize and promote existing City and School tax exemption policies available for one- or two-family new construction and substantial rehabilitation. Historically this program has been used by the not-for-profit agencies as a marketing tool to attract interested buyers for their homes. The program can encourage private development in the NRSA. Refer to the 2010 Housing Plan for detailed information on the following property tax abatement programs:

- Vacant Residence Exemption
- New Single- and Two-Family Residences
- Residential Improvement Exemption
- School Property Tax Exemption (STAR)
- Exemptions for Veterans
- Senior Citizens' Exemption
- Exemptions for Persons with Disabilities
- City of Syracuse Historic Property Exemption
- New York State and Federal Historic Rehabilitation Tax Credits

Objective: Ensure adequate supply of decent affordable housing options for renters.

Quality Affordable Rental Housing

The City contracts with Syracuse Model Neighborhood Corporation (SMNC) to maintain and manage quality affordable rental properties, including single- and two-family houses and larger multiunit buildings, located in the Southwest NRSA. SMNC also rehabilitates vacant

houses for rental occupancy. The City also works with housing partners Christopher Communities and Housing Visions Unlimited that provide safe, decent affordable rental housing for low income families, seniors, veterans, and other sub populations in need. While they don't contract directly for CDBG funding, the bulk of the work they do is located in the Northeast and Southwest NRSA. The long term strategy will be to continue to focus resources in these targeted areas.

In addition, a large part of the Syracuse Urban Renewal Agency's mission is to turn over tax seizable properties to responsible investor landlords.

Rental Registry

The City recently updated its Rental Registry program to ensure that all one- and two-family rental structures comply with the City's building code. This year, Code Enforcement will enforce compliance on a quadrant basis. Owners who received certificates under the previous program and who can attest that their property is still code compliant are exempt from paying the registry fee and do not require an interior inspection. With this action, the City hopes not to burden compliant property owners and focus its limited resources on the relatively few noncompliant owners. This will be of particular use in the Northeast NRSA, where code compliance is a major concern.

Objective: Assess and manage the growing number of vacant properties and reduce blight in the City.

Distressed Property Program

The City contracts with Home HeadQuarters to operate the Distressed Property Program. This program, when leveraged with other Federal, State and local funding resources, is used to rehabilitate and demolish vacant structures. Where possible, these efforts are targeted to produce the maximum impact on a street, enriching the area for continued development. The City anticipates the redevelopment of 18 properties, mostly in the NRSA.

Blight Removal

A new line item in this year's CDBG budget is dedicated toward the purpose of the elimination of blight for use by the City's nonprofit housing partners for the furtherance of ongoing neighborhood revitalization efforts, especially in the NRSA. Often, these efforts require the removal of blighted structures that are beyond the rehabilitation stage, where the removal of which will enhance the value of the surrounding properties. Each housing partner receiving funds from this line will be required to ensure that the activity directly benefits a low to moderate-income household either through the direct conveyance of the remaining vacant lot or through the construction of a new housing unit(s) affordable to low and moderate-income households. NBD anticipates removal of approximately four (4) structures.

Syracuse Urban Renewal Agency (SURA)

The SURA board of directors recently adopted a new property acquisition and disposition

plan which will enable SURA to employ five overarching strategies to address vacant, abandoned, and tax delinquent structures and lots within the SURA targeted area. The SURA target area, which is similar to the NRSA, focuses efforts on some of the city's most distressed neighborhoods. Through SURA's efforts, the goal is to maintain local control of vacant and derelict properties and avoid speculative property purchases that ultimately prohibit neighborhood revitalization and development from occurring.

SURA aims to stabilize and enhance the city's neighborhoods through the sale of tax foreclosed properties so that they may be returned to productive use and to remove abandoned properties' negative impact on surrounding property values and neighborhood perception. Rehabilitation of vacant and abandoned properties through SURA sale is intended not only to minimize blight, but to be an aesthetic improvement to the immediate block and surrounding neighborhood, encouraging reinvestment in the surrounding area. In addition to bringing a property into code compliance, aesthetic improvements to the exterior, meant to enhance "curb appeal," may be required by the SURA board as a condition of sale. Properties of particular historic or architectural value may be subject to additional conditions.

The strategies used include acquiring seizable, vacant properties for the following purposes:

- **Demolition:** The City will identify properties in the NRSA that are in such poor condition, demolition is the only viable option. SURA can seize these properties and create a post demolition strategy in order to plan for the disposition of the resulting vacant lot.

- **Neighborhood Revitalization Efforts:** The City will continue to work with various housing partners operating in the NRSA to identify properties within block plans and neighborhood plans that have been prioritized for rehabilitation, new construction, and/or demolition. These properties can be seized in order to obtain site control necessary to facilitate development plans within these particular areas.

- **Interim Land Banking:** Key projects occurring within the NRSA will require the acquisition of property to facilitate project development. These include projects like the Onondaga Creekwalk in the Southwest NRSA and the Connective Corridor in the Northeast NRSA. The strategy is to seize properties within these areas and hold them for future construction. The land banking strategy can also be used to assist housing partners who submit Low Income Housing Tax Credit proposals to New York State or other applications that require site control of properties prior to application.

- **Proactive Neighborhood Redesign:** SURA currently owns a handful of vacant lots and plans assume a portion of the City's and Home HeadQuarter's inventories of vacant lots. The City will implement the "Neighborhood Redesign" strategy, aggressively marketing the lots to adjacent property owners for purchase. This will reduce the number of abandoned and uncared for vacant lots throughout the NRSA and allow property owners the option for off-street parking and additional yard space.

- **Facilitate the Sale of Tax Foreclosed Properties:** SURA will qualify interested parties looking to purchase tax foreclosed properties within the NRSA. SURA will enter into a contract with the purchaser with an agreed upon work scope and time frame for the redevelopment of the property. If the purchaser violates the contract, SURA reserves the right to recapture title to that property.

These strategies will serve as a vehicle to assist targeted neighborhood revitalization efforts throughout the NRSA.

Vacant Property Inventory & Evaluation

NBD has recently begun the process of inventorying and evaluating all vacant buildings in the city, majority of which are in the NRSA. Many properties that are, for all intents and purposes, abandoned are held by speculators and current on tax payments, leaving seizure off the table as a strategy to encourage redevelopment of these properties. An interdepartmental abandoned property working group has begun research on this issue and other legal strategies to gain control over blighted properties and encourage their redevelopment. This group is also working to develop a strategy and identify funding for stabilization and weatherization of abandoned vacant buildings.

Neighborhood Revitalization & Neighborhood Block Plans

Below is a description of the concentrated neighborhood revitalization and block plan efforts located in the NRSA and what is expected to be accomplished through 2011. The City is financially supporting these targeted geographic approaches to neighborhood development to maximize impact and strengthen the housing markets within the NRSA neighborhoods.

Major Neighborhood Revitalization Projects

- **Prospect Hill Development**

  In an effort to complement the $35 million investment by St. Joseph's Hospital Health Center into expanding and upgrading their campus, located in the Northeast NRSA, the City worked with two local housing agencies to address pockets of blight surrounding the campus. The plan included a three phase approach: Phase I, which included the acquisition and demolition of over 80 dilapidated housing units; Phase II, which included the construction of 50 affordable, high quality rental units; and Phase III, including the acquisition and redevelopment of one- and two-family homes throughout the neighborhood for homeownership, which is currently underway.

  Home HeadQuarters has taken the lead role in administering the Phase III homeownership strategy. HHQ has purchased 19 investor-owned structures for redevelopment and resale to owner-occupants. To date HHQ has completed renovation on four structures and completed five demolitions. Three other redevelopment projects are currently underway and seven additional redevelopment projects are planned in 2011. The City will continue to support this neighborhood effort through City-administered CDBG and HOME funds.

- **Near Westside Initiative**
  The Near Westside Initiative, located in the Southwest NRSA, represents a collaborative effort between Syracuse University, the Gifford Foundation, the Syracuse Center of Excellence, the Syracuse University School of Architecture, Home HeadQuarters, community residents and stakeholders, and other key players to restore the Near Westside into a neighborhood of choice for residents of all incomes.

  The housing component centers around Blodgett School, Skiddy Park, and James Geddes Apartments in what is known as the Horseshoe. HHQ currently owns 45 properties within in this vicinity (through SNI funding) with rehabilitation funds secured through the City's successful 2007 Restore application. Over the past two years HHQ has completed 11 renovations, facilitated the sale of five homes "as-is" for $1 each, demolished ten homes, deconstructed one home (the first in the city), built four new constructions (three of them obtaining LEED silver rating), and completed four lot resubdivisions, all to forward the neighborhood redevelopment efforts. Dozens of other projects are underway.

  This neighborhood is also in the USGBC's LEED Neighborhood Development (ND) Pilot Project. It is one of the first existing neighborhoods in the country to seek LEED ND status.

  While the substantial investment and development over the past couple years has been impressive, the neighborhood continues to face challenges with vacant structures, substandard occupied housing, a very weak real estate market, and low homeownership rates. Through City-administered CDBG and HOME funds, investment will continue to be made in the neighborhood to ensure continued forward momentum in this neighborhood revitalization effort.

- **Kings Park Landing Neighborhood Revitalization**
  This project, located in the Southwest NRSA and focused around the South Salina Street Historic District, is a collaborative effort between Home HeadQuarters, Syracuse Model Neighborhood Corporation, and Housing Visions Unlimited to revitalize the neighborhood with a mix of new construction, rehabilitation, demolition, home improvement block blitzes, and homeowner assistance. Financing for this project includes CDBG and HOME funds and Low Income Housing Tax Credits.

- **Homes of Syracuse – Syracuse Housing Authority/NRP Group**
  The Syracuse Housing Authority and the NRP Group have secured funding to build 50 scattered site single family homes throughout the Southwest NRSA. Each of these homes will provide high quality rental opportunities for families below 50% of the area median income. The Syracuse Housing Authority will manage these single family rentals for 15 years until their sale to first time low-income homeowners. Project construction is anticipated to begin summer 2011.

Redevelopment of Former ElJay Properties

In 2010, the City issued an RFP for ownership and redevelopment of nine large residential apartment buildings in five separate neighborhoods totaling 277 units which were the subject of a HUD foreclosure. In the coming year, the City will oversee the redevelopment of these buildings to provide quality, affordable rental units for low- and moderate-income residents throughout the city. Eight of the nine projects are located in the NRSA:

- **James Street Apartments**
  The City is financially supporting the rehabilitation of two large apartment buildings at 615 and 622 James Street in the Northwest NRSA, which will be developed into 79 mixed-income residences. The developer, Conifer Realty, is currently applying to New York State for tax credits and financing. These properties sit strategically within the Prospect Hill Neighborhood and at the edge of the downtown area and are prime for development.

- **Leonard Apartments**
  The City applied for and received Neighborhood Stabilization Program funding on behalf of the Syracuse Housing Authority (SHA) and their partner-developer, National Housing Trust (HTF) to redevelop three adjacent buildings totaling 48 units, located on the corner of West Street and W. Onondaga Street in the Southeast NRSA. Work is currently underway and completion is slated for early 2012 and will provide housing for households earning 50% or less than the average median household income for the Syracuse metropolitan area, fulfilling a dire need in this community. SHA will continue to own and manage the properties upon completion of the rehabilitation.

- **The Roosevelt (S. Salina St.) & Hillside (E. Genesee St)**
  These two buildings, located in the Southwest NRSA and each containing 45 units, are the subject of a pending Low Income Housing Tax Credit application submitted to New York State in February 2011. Conifer Realty is the owner and applicant. All units in these buildings will be rented to low income households. These properties will be owned and managed by Conifer throughout the term of the affordability period.

- **The Jeditha (1000 Bellevue Ave.)**
  This 18-unit apartment building, located in the Southwest NRSA, was conveyed to a private developer, Salt City Homes, LLC for renovation. Once a demolition candidate, primarily due to the lack of parking, the developer took on this challenging project and has been redeveloping the property without any public assistance since taking title to the property in 2010. The parking issue was addressed by the developing acquiring a vacant lot nearby for use as parking. A grand opening for the building is slated for June of 2011.

Community Initiatives

The Community Initiatives program is the result of negotiations between the City, the County, and neighborhood residents following the construction of a sewage treatment plant

on the City's southwest side in 2008. These mitigation funds were distributed among the following projects, all located in the Southwest NRSA.

- **Midland-Lincoln-Bellevue**
  This project, located in the Southwest neighborhood, was allocated $3 million in Community Initiative funding. The City worked with a resident steering committee, along with Syracuse Model Neighborhood Corporation and Jubilee Homes, to implement the program and revitalize the aging housing stock. To date, the program has administered 44 owner-occupant mini-grants, 31 roof grants, 4 investor-owner mini-grants, 13 grants for the acquisition and rehabilitation of vacant blighted houses, and 4 low-interest loans. In addition, the program has funded the demolition of 5 blighted structures and provided 8 grants to local businesses for façade and structural improvements. The initiative has contributed funding for acquisition and development of the Southwest Community Farm and for mechanical improvements to the Southwest Community Center, which will take place in 2011.

- **Skunk City Community Initiative**
  This project, focused on the Skunk City neighborhood on the city's west side, received $2 million in Community Initiative funding. The City worked with a resident steering committee, Syracuse United Neighborhoods, and Home HeadQuarters to revitalize the neighborhood. To date, Home HeadQuarters has administered 38 mini-grants to both investor owned properties and owner occupied properties. HHQ has also administered 10 home improvement loans in the neighborhood and 1 purchase-rehab and down payment and closing cost assistance grant. HHQ has also completed rehabilitation of 4 properties for sale to owner occupants and plans to build 3 new homes in 2011.

- **Sackett Tract Community Initiative**
  This project, located in the Park Ave. neighborhood between Frazer School and the Sacred Heart Basilica, received $1 million in Community Initiative funding. The money was allocated for mini-grants and loans for homeowners and investors, park improvements, and commercial façade grants. After two years of administering the underutilized mini-grant and home improvement loan programs available in this neighborhood, Home HeadQuarters and NBD revamped the revitalization strategy for Sackett Track and adopted a new plan in November 2010. The new plan will incorporate substantial rehabilitation, new construction, demolition, and partial rehabilitation of mixed use structures. In 2011, new construction and rehabilitation are planned for the 800 block of Park Avenue.

Block Plans

- **Palmer Avenue**
  Jubilee Homes has identified the 100 block of Palmer Avenue, in the Southwest NRSA, as an area in need of revitalization. Working with the City, Jubilee Homes has prepared a block plan, assessing the condition and needs of each property and identifying which properties are in need of moderate to substantial rehabilitation,

demolition, and mini-grants. This project, scheduled to begin this year, will be partially financed with CDBG and HOME, resulting in up to four newly constructed single-family homes and three rehabilitated homes.

- **Gertrude Street**
  The Northeast Hawley Development Association (NEHDA) has identified the 200-300 block of Gertrude Street, in the Northeast NRSA, as an area in need of investment and revitalization. With technical assistance from the City, NEHDA has prepared a block plan that assesses the condition and needs of each property and identifying properties in need of rehabilitation, demolition, code enforcement, foreclosure assistance, and mini-grants. This project, scheduled to begin this year, will be partially financed with CDBG and HOME funds.

- **Butternut Circle**
  The City is working with the Northeast Hawley Development Association (NEHDA), the Danforth-Pond-Butternut Task Force, and the Court-Woodlawn Task Force to develop plans for the Butternut Circle/Grant Boulevard business corridor and the Butternut Street residential neighborhood, located in the Northeast NRSA. This area is home to many small businesses and has a high level of homeownership, but it still in need of investment and revitalization. The plan would seek funds from New York State Main Street and other sources to improve the façades of businesses along the 1600-2000 blocks of Grant Boulevard, and improve the walkability and mixed-use character of the area. The residential program will provide up to ten grants to homeowners to improve their properties along the 1200-1400 blocks of Butternut Street.

Infrastructure

Assessment

The NRSA includes some of the oldest neighborhoods in the city, and thus some of the oldest infrastructure. This has been exacerbated by decades in which the city's tax base has declined in relation to its service and maintenance costs. While the street pattern and architecture are highly valuable, the aging infrastructure in these neighborhoods often makes development more expensive than other parts of the city.

Regional transportation infrastructure is focused in the NRSA, which is the transportation hub of the region. This infrastructure is truly multi-modal. The north-south Interstate 81 meets the east-west Interstate 690 providing excellent vehicular access to a very large market area. Rail lines also converge in the NRSA both for cargo and passengers. The William F. Walsh Regional Transportation Center (RTC) serves both rail (Amtrak) and buses (Greyhound and CENTRO) for passenger service.

Sidewalks line almost all of the city's streets on both sides. Installation and maintenance are the responsibility of the abutting property owners. Thus, many of the city's sidewalks are in disrepair, evidence of the overall loss of wealth and disinvestments. The condition of sidewalks has recently been the topic of much discussion, as people are becoming aware of their potential to improve the civic realm.

Street lighting is franchised to and maintained by National Grid, the local power company. Most lights are standard cobra head sodium lights, although several city neighborhoods have opted to form districts to maintain ornamental lighting features.

Syracuse's water system became operational in 1896. An average of 44 million gallons daily is withdrawn from Skaneateles Lake and fed through an aging gravity system. Emergency repairs and leaks affect the system. Some estimate that 50 percent of intake is lost through leaks in the system. The City's Water Department is working on putting a leak detection program in place. The City has completed a Land Protection Plan for the Skaneateles Lake Watershed that addresses strategies to preserve the quality of Skaneateles Lake water and avoid the requirement for filtration.

The City collects residential solid waste, recycled goods and yard waste daily. Waste is transported to the Onondaga County Resource Recovery Facility outside the city. Housing density and commercial structures in the NRSA heightens the need for the timely collection of solid waste and cooperation of tenants and landlords.

The Syracuse Metropolitan Transportation Council is currently holding public workshops to gather input on the removal or replacement of the raised portion of Interstate 81 which runs along the eastern border of the Southwest NRSA and the southwest border of the Northeast NRSA. The removal of this raised highway may mark the beginning of remediating the damage and decreased accessibility inflicted upon these neighborhoods by mid-century Urban Renewal policies.

Many parks and playgrounds including Lower Onondaga, Leavenworth, Lincoln Hill, Rose Hill, Schiller, and Kirk Parks and Washington Square provide open space to the area. However, many neighborhoods lack access to open space within a ¼ mile walking distance.

Empowerment Strategies

The following goals and strategies will be pursued through inter-departmental efforts to ensure that the public realm and infrastructure reflect a commitment to revitalization in the NRSA.

Objective:	Align the City's capital improvement budget with neighborhood planning efforts to leverage planned investment.

Working with the Departments of Public Works, Parks, and Budget, NBD will work to assure that capital investment projects complement CDBG investment in buildings and neighborhoods. In addition, a plan should ensure that projects in the NRSA are given high priority due to the age of infrastructure in these areas.

Objective:	Expand recreation options within the NRSA and work to connect the City's open space network.

Phase II of the *Onondaga Creekwalk*, which currently runs from the Inner Harbor in the Lakefront to Armory Square downtown (outside of the NRSA) will extend south from Armory Square to Kirk Park (in the Southwest NRSA). The Creekwalk project is actively turning what used to be an eyesore and a liability—the creek was long used as a dumping site and was subjected to sewer overflows during heavy storms—into a community open space, environmental, and recreational asset. This bike and pedestrian trail will beautify the area, provide improved access throughout the Southwest NRSA and connectivity to Downtown, and be combined with further environmental remediation projects for the Creek. Phase III will eventually extend to the southern end of the city.

The *Connective Corridor*, an effort in partnership with Syracuse University and funded by a variety of grant sources, is focused on connecting SU's campus (not in the NRSA) with Downtown and the Near Westside. This project primarily consists of a frequent-service, free bus route, but is being implemented in conjunction with an ambitious program of streetscape improvements. The line runs through the Near Eastside and Near Westside neighborhoods, which are included in the NRSA, and connects them to the region's cultural hub, Downtown Syracuse, which is home to numerous museums, parks, festivals, and events.

Planned additional bike lane miles may serve to advance this connected network.

Objective: Improve safety and condition of the alternative transportation (walking and biking) network throughout the NRSA.

The City of Syracuse is currently proposing complete streets legislation at the local level to ensure that all new transportation planning considers various modes of transportation and ambulatory abilities. The City aims to double citywide bike lane miles in by 2012. This is intended to increase all residents' level of access to services, shopping, and entertainment, and also to reduce greenhouse gas emissions by encouraging walking and biking. This will also encourage economic development by creating commercial and mixed-use environments that are more pedestrian friendly.

NBD will work with the Department of Public Works to strategically enforce of the City's sidewalk construction and snow removal ordinances to improve the appearance of neighborhoods and increase public safety, while discouraging pedestrians from walking in the street.

The City will work with National Grid to develop a more systematic approach to ensuring streetlights are functioning properly.

Objective: Improve storm water management and prevent combined sewer overflows within the NRSA.

Wastewater treatment and trunk sewers are the responsibility of Onondaga County. The County, under consent order to improve water quality in Onondaga Lake, has undertaken a $500 million program to eliminate combined sewer overflows to Onondaga Creek and Harbor Brook with regional treatment facilities, new interceptor sewers, trash traps and sewer separation in a limited number of small drainage basins. This program, called *Save the Rain*, is designed to reduce storm water runoff's impact on the combined sewer overflow system, primarily through green infrastructure improvements throughout the city, most located in the Southwest NRSA. These are slated to include community gardens, rain gardens, urban forests and orchards, and a host of streetscape improvements.

The City has worked to facilitate this work and coordinate it with housing agency investments, street improvements, and park upgrades. The City will further work to amend our zoning ordinance so that it is easier for interested neighborhood groups to install community gardens and other green spaces throughout residential neighborhoods.

In addition, the City's tree planting plan should address the relative lack of street trees in the NRSA areas. The City arborist and US Forest Service will unveil data this year on the street tree coverage by neighborhood. This will be followed by setting goals for improved tree coverage throughout the city. NBD will work to ensure that this process allocates an adequate number of trees to the NRSA.

Public Safety

Assessment

The Syracuse Police Department's Community Policing Centers have been a successful outreach mechanism into the City's neighborhoods. The Butternut Community Policing Center on the Northside hosts a variety of children's activities and events with neighborhood residents. Other policing centers in the NRSA are located on Otisco Street in the Near Westside, South Salina Street on the Southside, and Butternut and Wolf Streets on the Northside. Community policing centers create a venue for positive interaction between neighborhood residents and Syracuse police officers.

A number of very active neighborhood watch groups are located throughout the NRSA. These are in direct communication with the Syracuse Police Department. Community concerns regarding crime and traffic related safety issues are heard by Police and City Departments at monthly TNT (Tomorrow's Neighborhoods Today) community meetings, a venue for neighborhood residents and organized groups to communicate with one another and City government.

The City of Syracuse Police Department has recently launched a public relations campaign called *Raise Your Hands, Raise Your Voices*. After a rash of gun violence, the purpose of the campaign is to encourage residents to report illegal guns to the Syracuse Police Department using an anonymous gun tip line. Bill boards, television commercials and radio ads have all been used to get the word out and to stand up and stop the violence.

The Syracuse City Police Department has also recently launched their COPS (Criminal Observation and Protection System) pilot which is designed and implemented to help protect the citizens of Syracuse by preventing crime and aiding in the investigation and prosecution of any crime that occurs in the pilot area, which is within the Southwest NRSA. Extensive research was completed on the proposed system and use of cameras. This research does indicate that cameras of this nature have a deterrent effect on overall criminal disorder and undoubtedly aid in the investigation and prosecution of criminal behavior.

Empowerment Strategies

The following objectives will be pursued jointly by City departments, including NBD, the Police, and the Mayor's Office, in collaboration with nonprofits and neighborhood groups.

Objective: Improve the relationship between police and residents.

NBD and community groups should work collaboratively with the Syracuse Police Department, specifically its Community Policing Department, to engage patrol officers in daily neighborhood activities. The City and local communities should fully adopt the department's Police Storefront Program, which will strategically develop storefronts in crime "hot spots" throughout the city. The City and its housing partners should assist this initiative by providing city-owned or housing partner owned properties for temporary storefront use.

The Police Storefronts should be open longer hours and focus on increased programming to attract neighborhood youth.

The Community Policing Department will continue with bike and foot patrols to provide more face-time in the neighborhood.

Objective: Decrease violent and "quality of life" crime rates in the NRSA.

NBD in collaboration with the Police Department will work with the COPS pilot program where cameras were installed within the Near Westside Neighborhood in the Southwest NRSA. Short-term and long-term monitoring to evaluate the effectiveness of this strategy could potentially lead to other camera installations throughout the NRSA's.

NBD will continue to work closely with the network of neighborhood watch groups as well as encourage the formation of new neighborhood watch groups as a way to engage residents in the neighborhood and allow the residents to assist in tracking and reporting crimes.

Code Enforcement

Assessment

Code enforcement within the NRSA has been a challenge due to the relative lack of investment in properties. Both NRSA areas have numbers of rental properties and absentee landlords higher than the citywide average.

The Division of Code Enforcement, within the Department of Neighborhood and Business Development, is currently undergoing a reorganization to focus inspectors on four quadrants of the City and better respond to neighborhood, planning, and housing priorities. This will entail meeting with neighborhood groups to identify their priorities to improve quality of life throughout the city while managing scarce staff resources. The City's 2010 Housing Plan calls for effective utilization of the Division of Code Enforcement for these reasons.

In 2010 the City re-implemented a Rental Registry to better keep track of rental properties, improve communication with landlords, and preemptively address properties that are prone to code violations. A similar registry for property managers has been proposed to ensure that out-of-town landlords use reputable property managers with a history of compliance.

In addition, the Division of Code Enforcement, which carries out court-ordered demolitions for the City, has recently made an effort to strategically coordinate demolitions with planning and law staff for the maximum impact. One strategic priority includes demolitions to complement and facilitate CDC and neighborhood plans in the NRSA.

The Law Department is working with Codes and Planning to ensure that a variety of strategies to prosecute code violations in ways that emphasize neighborhood-level priorities. A plan is currently being developed to gather community input to needed to guide these strategies.

Empowerment Strategies

Objective: Coordinate Code Enforcement efforts with revitalization strategies.

Increased communication between neighborhood planners and the Division of Code Enforcement will ensure that simple code compliance issues may reinforce revitalization goals. Housing providers' block plans are being provided to Code Enforcement teams so that they can ensure new public investments are being well cared for.

Objective: Increased quality of rental housing and improved relationship between the city, landlords, and tenants.

Full implementation of the Rental Registry in all four quadrants is planned to facilitate this

and proactively prevent code violations. This tool gives the City a local contact for every residential rental so that code violations may be quickly resolved.

Objective: Coordinate court-ordered demolitions with neighborhood plans.

Inventory and evaluation of all vacant and abandoned properties and coordination with housing agency investments will ensure that demolitions have the biggest impact possible and remove the properties that are the biggest blight on their neighborhoods.

Zoning & Land Use

Assessment

Syracuse's zoning ordinance was written in the 1960s, when the suburban model of land use regulations, with an emphasis on the private automobile, off-street parking, and de-densification was viewed as a way to remove blight and revitalize urban neighborhoods. This code rendered standard lot sizes in most of the NRSA neighborhoods 'unbuildable.' New construction isn't required to fit in with its surroundings by matching the predominant setback, form, or scale.

An emphasis on the separation of uses limited options for the reuse of existing buildings and parking minimums in commercial corridors in which buildings were typically built to the lot lines has encouraged demolition. Furthermore, zoning has made it difficult for restaurants and small groceries to locate within walking distance of most neighborhoods, in locations that they occupied during the streetcar era.

Empowerment Strategies

A new land use plan, currently being prepared by the Bureau of Planning & Sustainability, will guide zoning changes designed to remedy these, and additional, issues.

Objective:	Ensure that development standards for new construction in historic neighborhoods complement the character of the neighborhood.

Studies have shown that neighborhoods with a cohesive character and design are far more likely to experience increased property values and successful revitalization. We should ensure that new investment is in keeping with the historic character of the neighborhood so that it leverages other investment, rather than detracting from it.

Not only should new construction be allowed on historically standard lot sizes (33' frontage), but the subdivision ordinance should set maximum lot frontages for each zone.

New construction in residential neighborhoods should conform to the prevailing form, scale, setbacks, and fenestration patterns.

In commercial areas, new development should prioritize the pedestrian over the automobile. Zoning revisions should protect areas in which buildings ought to be built to the sidewalk and include large storefront windows to increase visibility and

Objective:	Prevent large or frequent unscreened parking lots from detracting from neighborhoods.

Parking maximums will encourage alternative modes of transportation, and improved

screening standards will ensure that vast expanses of asphalt don't detract from the character of neighborhoods and commercial corridors.

Lighting standards in commercial areas will improve pedestrians' perceptions of safety and security.

Minimum landscaping standards for parking lots will provide a visual buffer and an aesthetic improvement to the surrounding neighborhood. Encouraging parking be made of permeable surfaces will prevent flooding common along heavily paved corridors.

Objective: Allow for creative reuse of buildings and land.

Use restrictions should be loosened to allow for mixed-use, walkable neighborhoods and encourage the reuse of existing buildings. These should also allow for a variety of alternative uses for vacant land when traditional development isn't feasible—including community gardens, orchards, and other green infrastructure.

Economic Development

Assessment

The Northeast NRSA includes a number of neighborhood commercial corridors: East Fayette Street, Burnet Avenue, North Salina Street, Wolf Street, Grant Boulevard, and Butternut Street. Some of these are more vibrant and active than others, but most support a variety of retail and service activities. The primary commercial corridors in the Southwest NRSA include South Salina Street, South Avenue, West Fayette Street, West Genesee Street, and Geddes Street.

Neighborhood commercial corridors struggled in the post-war economic climate, which favored strip mall development and space for the automobile. A resurgence of public appreciation for walkable, urban neighborhoods places Syracuse, which retains the structure of this earlier urban pattern, in a position to revitalize its commercial corridors. New York Main Street grants and historic rehabilitation tax credits have encouraged façade improvements on these corridors over the past decade, which were often accompanied by streetscape improvements as well.

The South Side Innovation Center, sponsored by Syracuse University and located on South Salina Street in the Southwest NRSA, provides a model for successful small business incubation centers. Investments in human capital such as this are essential to revitalizing the proposed NRSA neighborhoods. An increased focus on entrepreneurial training, access to capital for business startups, and workforce development training are available in the NRSA, but are needed in increasing measure to counter the many barriers to economic empowerment described in the Demographic Indicators section of this plan.

Investment in Syracuse residents must be combined with incentives to rehabilitate and reoccupy abandoned commercial buildings, as well. Some of the existing incentives are described below.

The influx of immigrants to Syracuse's Northside has shown what potential there is for investment in older, neighborhood commercial areas. With lower rents than many other commercial areas, and within walking distance of their mostly lower-income clientele, these buildings are a prime location for new small businesses. The Northside is now home to approximately fourteen ethnic food markets and countless restaurants.

	Citywide	Northeast NRSA		Southwest NRSA		Combined NRSA	
Vacant commercial structures	194	69	36%	66	34%	135	70%
Vacant industrial structures	9	3	33%	3	33%	6	67%
Vacant lots	3665	598	16%	1741	48%	2339	64%

*City of Syracuse Assessment & Code Enforcement data
(Jan. 2010)

According to U.S. Postal Service vacancy data there are approximately 1400 occupied business addresses in the Northeast NRSA and 900 in the Southwest NRSA.

Empowerment Strategies

The Department of Neighborhood & Business Development, created in January 2010 through the merging of the City's Departments of Community Development and Economic Development, is in a particularly effective position to address economic conditions across city neighborhoods and coordinate these efforts with neighborhood planning and CDBG investment in housing and commercial corridors. The combined department is better able than ever before to address these issues with comprehensive strategies that address the physical and economic condition of the city.

Objective: Increase small business startups and decrease failure rate of small businesses.

The City, in collaboration with business organizations and Syracuse University, will develop a series of projects designed to promote successful entrepreneurship within the NRSA. These projects will build upon the foundations of already existing programs, such as the South Side Innovation Center, modifying them to accommodate NRSA needs.

The City will work with lenders to expand small business' access to capital.

The City's MWBE program will promote minority- and women-owned businesses and workforce development training for NRSA residents.

Objective: Promote job skills training and continued education programs for NRSA residents.

The City will continue to support job skills training programs, especially in the skilled trades and green technologies, in collaboration with groups such as CNY Works and the Syracuse Center of Excellence.

The Empowerment Zone program continues to reward employers for hiring residents within their zone, much of which is located within the proposed NRSAs.

Objective: Revitalize neighborhood commercial corridors within the NRSA.

As distressed housing conditions are addressed and improved, there is a need to revitalize the commercial and service areas which have traditionally served neighborhoods. Strategic use of private and public funding will be used to match funds from sources such as the New

York Main Street Program.

In addition, State and Federal Historic Rehabilitation Tax Credits are available for qualifying commercial and owner-occupant rehabs in the North Salina Street and Hawley-Green National Register historic districts in the Northeast NRSA and the South Salina Street National Register district in the Southwest NRSA.

NYS Historic Rehabilitation Tax Credits

- Historic Residential Properties Tax Credit Program provides a tax credit of 20 percent of qualified rehabilitation costs of structures, up to a credit value of $50,000. A "Qualified Historic Home" must be:
  - an owner-occupied residential structure, listed on the State or Nation Register of Historic Places either individually or as a contributing building in a historic district.
  - Located in a federal census tract that is at 100 percent or below the state family median income level or identified as a qualified contract section 143 (j) of the Internal Revenue Code or in an area designated as an Area of Chronic Economic Distress. SHPO staff assists in making this determination.

  The project must:
    - Have qualifying rehabilitation costs that exceed $5,000
    - Spend at least 5 percent of the total on exterior work
    - Receive preliminary approval from SHPO staff
    - Be completed after January 1, 2010
- Historic Tax Credit Program for Income Producing Properties – projects qualifying for the 20 percent Federal Historic Preservation Tax Incentive Program are automatically eligible for this credit. Owners can receive 20 percent of the qualified rehabilitation costs, up to a credit value of $100,000.

Federal Historic Rehabilitation Tax Credits

- Owners of historic commercial, office industrial or rental residential buildings may be eligible for a 20 percent federal income tax credit for substantial rehabilitation projects. Buildings must be income producing and individually listed on the State or National Register of Historic Places, or a contributing building in a historic district that is listed on the National Register of Historic Places or certified by the National Park Service.
- A 10 percent federal income tax credit is available for the rehabilitation of non-historic building for non-resident use. Buildings must be income producing and not listed in the National Register, or not listed as a contributing building in a National Register Historic District and was first placed in service before 1939.

Furthermore, commercial corridors in both areas (North Salina Street in the Little Italy area, South Avenue, and South Salina Street) have received New York Main Street funding for façade improvements. An application for further funding for South Avenue, in the Southwest NRSA, is currently under consideration by New York State Homes and Community Renewal.

The City offers the New York State 485A tax abatement for commercial buildings being

converted from single to mixed-use. This abatement allows a partial reduction in property taxes for a period of 13 years, encouraging further redevelopment of pedestrian friendly vibrant commercial corridors. It is ideal many of the multi-story commercial buildings that line neighborhood-scale business corridors throughout the NRSA area.

The Northeast NRSA has received large numbers of Southeast Asian and African immigrants over the past several decades and has proved to be a fertile market for small businesses. The North Salina Street and Butternut Street corridors contain most of this activity and the area is now home to approximately fourteen ethnic markets and numerous restaurants.

Brownfields

Two Brownfield Opportunity Areas are located within the NRSA area. The Hiawatha Boulevard Brownfield Opportunity Area (BOA) is located within the Northeast NRSA and the South Salina Street BOA is located in the Southwest NRSA. The BOA program is funded by the New York Department of Environmental Conservation (DEC) to promote revitalization in brownfield areas. Currently these are both finishing the nomination phase, which will be followed by the implementation phase which will include environmental assessment of brownfield sites, qualifying them for funding and readying them for rehabilitation.

Developers of brownfield properties may also take advantage of the New York DEC's Brownfield Cleanup Program tax credits for up to 50 percent of the cost of site preparation, including cleanup, fencing, security, grading, and other preparation activities, excluding acquisition.

Performance Measurements

Housing & Neighborhood Development

Objective:	Ensure adequate supply of decent, affordable housing options for homeowners and remove unnecessary barriers to homeownership.
Benchmark:	Create 600 new first-time homebuyers in the City of Syracuse.
Benchmark	Provide 430 home improvement loans to assist existing owner occupants in making necessary home repairs to keep them in their homes.

Objective:	Ensure adequate supply of decent affordable housing options for renters.
Benchmark:	Implement the Rental Registry citywide.
Benchmark:	Develop a program to certify local property managers.
Benchmark:	Increase coordination with private landlords to provide safe, decent affordable housing.

Objective:	Assess and manage the growing number of vacant properties and reduce blight in the City of Syracuse.
Benchmark:	Refine and implement a collaborative system for Planning and code Enforcement to evaluate all vacant buildings throughout the city.
Benchmark:	Develop a system and a fund to proactively stabilize properties in strategic areas to prevent further deterioration.
Benchmark:	Enforce requirements that buildings be kept secured against the elements to prevent further deterioration.

Infrastructure

Objective:	Align the City's capital improvement budget with neighborhood planning efforts to leverage planned investment.

Benchmark:	Establish a formal dialogue between NBD, DPW, and Budget and a system to ensure that the City's capital improvement budget is leveraged against other investments and reinforces planning and economic development goals.

Objective:	Expand recreation options within the NRSA and work to connect the City's open space network.
Benchmark:	Complete Phase II of Onondaga Creekwalk through the Southwest NRSA

Objective:	Improve safety and condition of the alternative transportation (walking and cycling) network throughout the NRSA.
Benchmark:	Increased compliance with city sidewalk ordinances.
Benchmark:	Decreased numbers of vehicle/pedestrian and vehicle/bicyclist accidents.
Benchmark:	Decreased average streetlight outages.

Objective:	Improve storm water management and prevent combined sewer overflows within the NRSA.
Benchmark:	Amend zoning legislation to allow community gardens and a variety of sustainable open space alternative land uses within most residential and commercial zoning districts.
Benchmark:	Facilitate Onondaga County Save the Rain runoff prevention projects throughout the NRSA using SURA to acquire and transfer property to a long-term steward.
Benchmark:	Increase tree canopy coverage within the NRSA.

Public Safety

Objective:	Improve the relationship between police and residents.
Benchmark:	Increased hours and access to community policing centers.

Objective:	Decrease violent and "quality of life" crime rates in the NRSA.
Benchmark:	Decreased crime rates.
Benchmark:	Increased participation in neighborhood watch and increased numbers of neighborhood watch groups formed.

Code Enforcement

Objective:	Coordinate Code Enforcement efforts with revitalization strategies.
Benchmark:	Increased code compliance in revitalization areas and around block plans.

Objective:	Increased quality of rental housing and improved relationship between the city, landlords, and tenants.
Benchmark:	Implement the Rental Registry throughout all four quadrants.
Benchmark:	Increased code compliance among rental properties.

Objective:	Coordinate court-ordered demolitions with neighborhood plans.
Benchmark:	Neighborhood block plans have an increase in leveraged funds towards their projects

Zoning & Land Use

Objective:	Ensure that development standards for new construction in historic neighborhoods complement the character of the neighborhood.
Benchmark:	Zoning standards will be revised to ensure that new construction matches the prevailing setback, form, and scale of the surrounding neighborhood.

Objective:	Prevent large or frequent unscreened parking lots from detracting from neighborhoods.
Benchmark:	The zoning ordinance will be amended such that the number of eyesore parking lots will not increase on commercial corridors and parking lots will not be allowed to expand or be introduced in residential areas.

Objective:	Allow for creative reuse of buildings and land.
Benchmark:	Numbers of restaurants and groceries within neighborhood business corridors will increase, and residential-to-commercial conversions will increase as more uses are allowed within zoning districts.
Benchmark:	More flexible allowed uses in residential zones will allow increased creative uses for vacant land—including community gardens, orchards, etc.

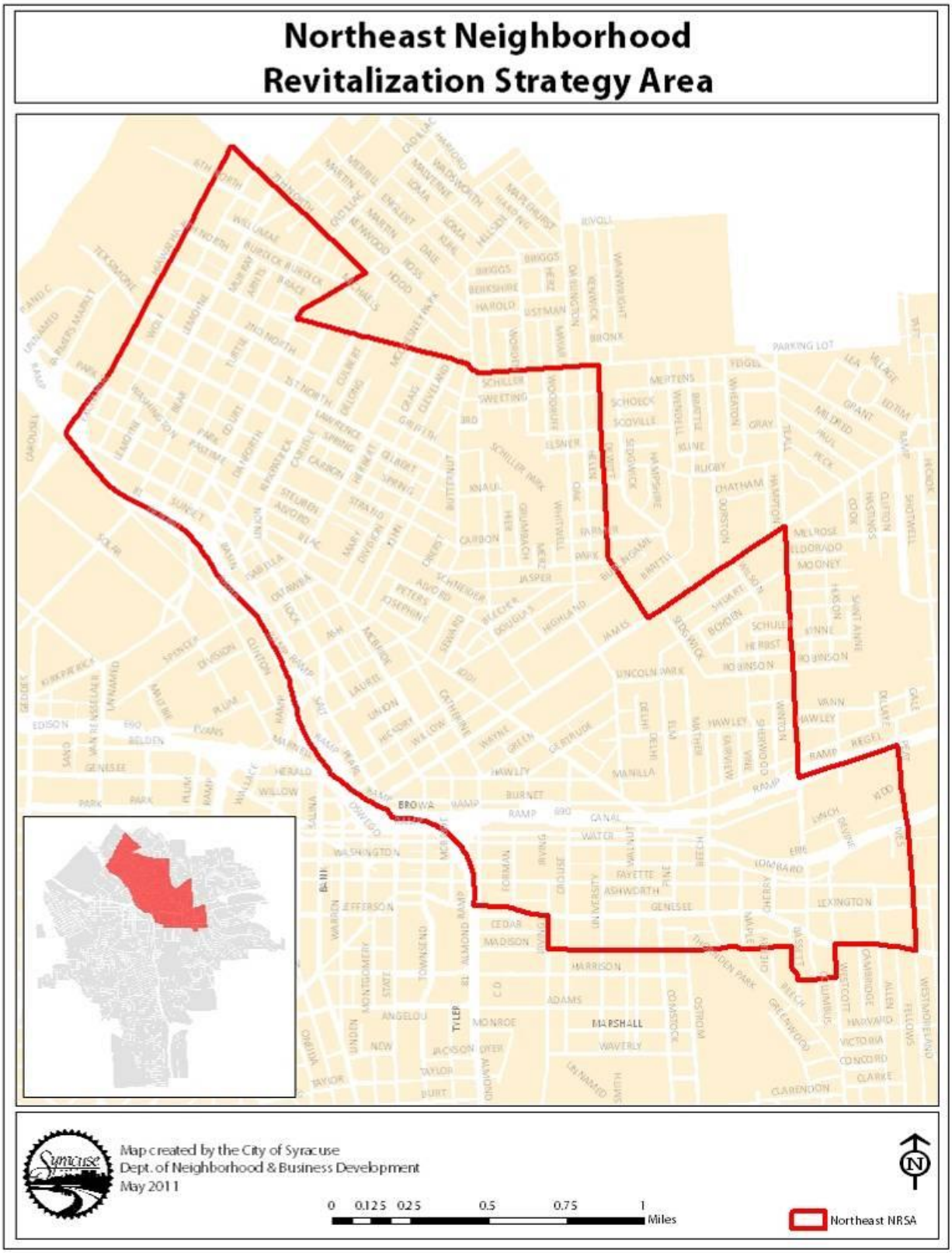
Economic Development

Objective:	Increase small business startups and decrease failure rate of small businesses.
Benchmark:	SURA will support entrepreneurs 'graduating' from small business incubators in both NRSAs in finding commercial space to own, when desired.
Benchmark:	Participation rates will increase in small business incubators.

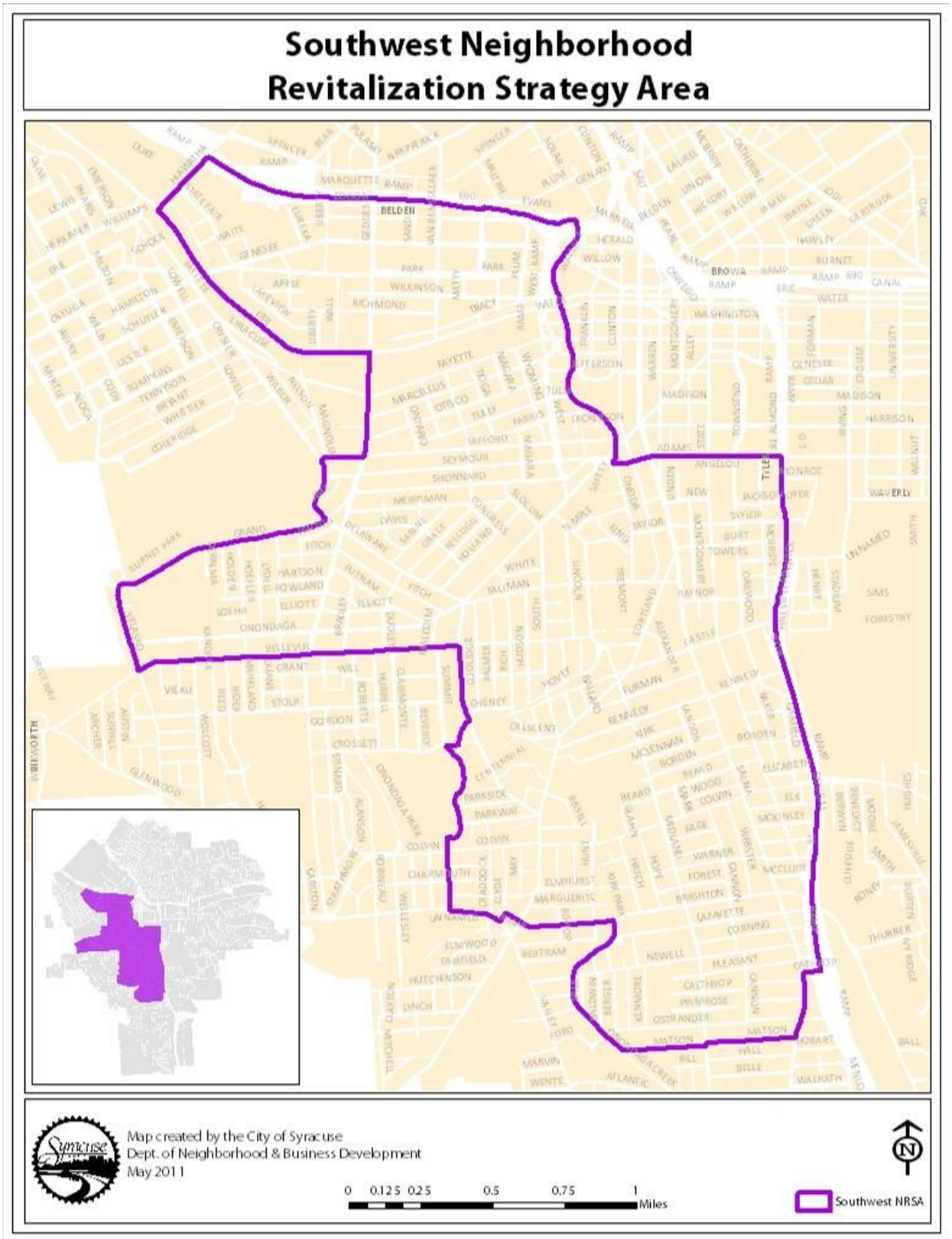
Objective:	Promote job skills training and continued education programs for NRSA residents.
Benchmark:	Employment rates in the NRSA will rise.

Objective:	Revitalize neighborhood commercial corridors within the NRSA.
Benchmark:	Decreased vacancy rates in neighborhood commercial corridors.
Benchmark:	Increased capital investment in commercial properties in these corridors.

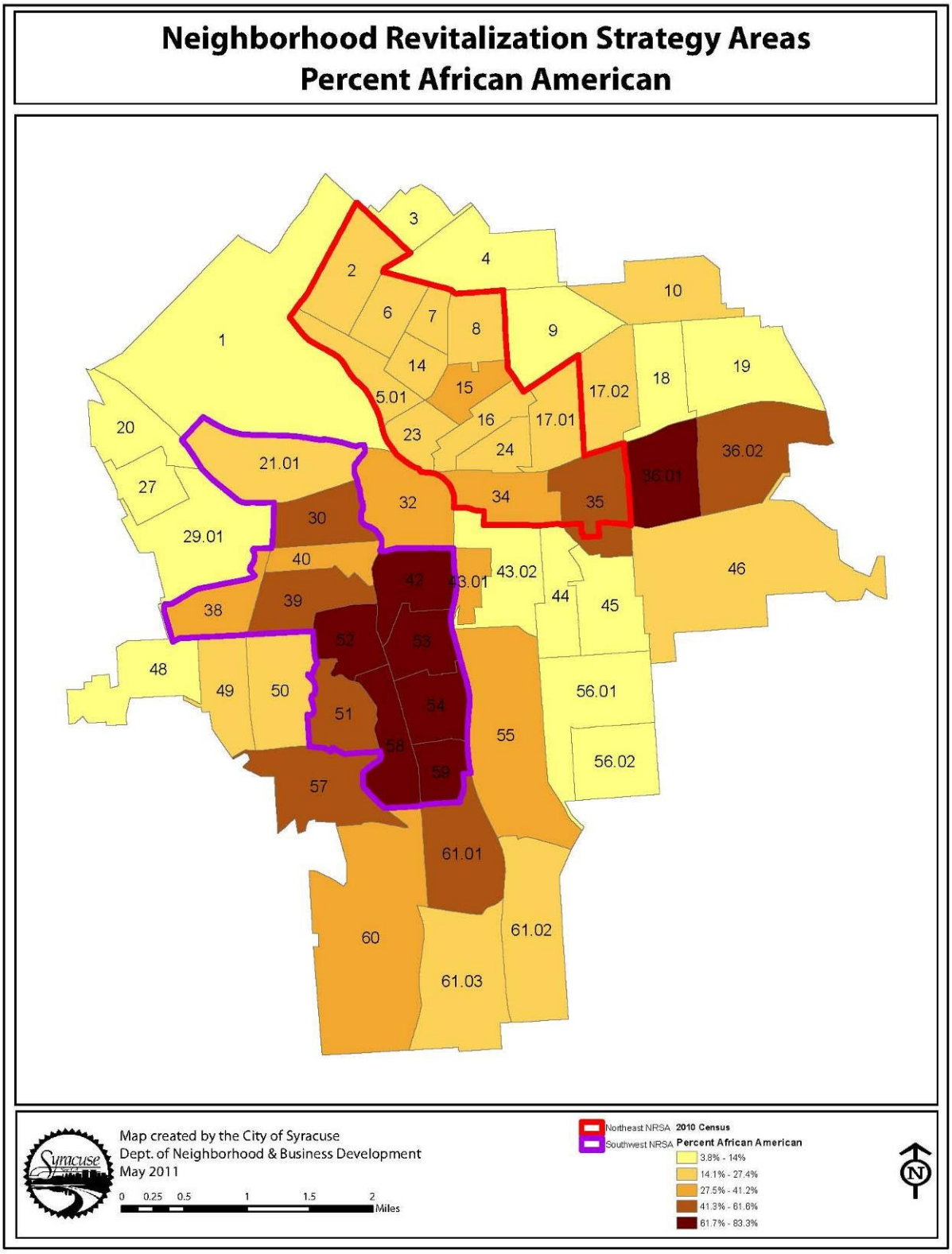
Appendix A – Northeast NRSA



Appendix B – Southwest NRSA

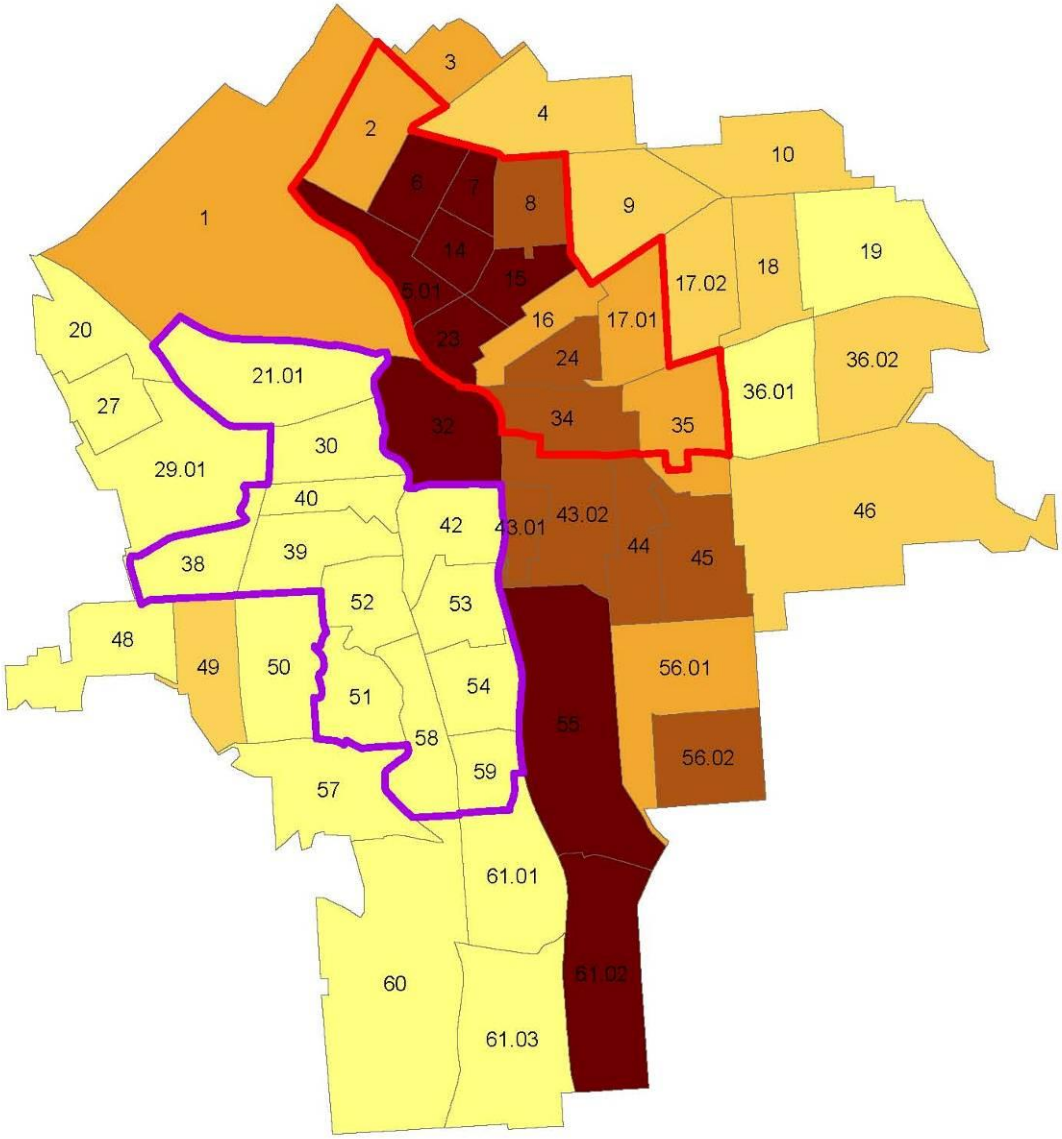


Appendix C – 2010 Census Racial and Ethnic Distribution[9]



[9] 2005-2009 ACS Estimates, U.S. Census

Neighborhood Revitalization Strategy Areas
Percent Asian



Map created by the City of Syracuse
Dept. of Neighborhood & Business Development
May 2011

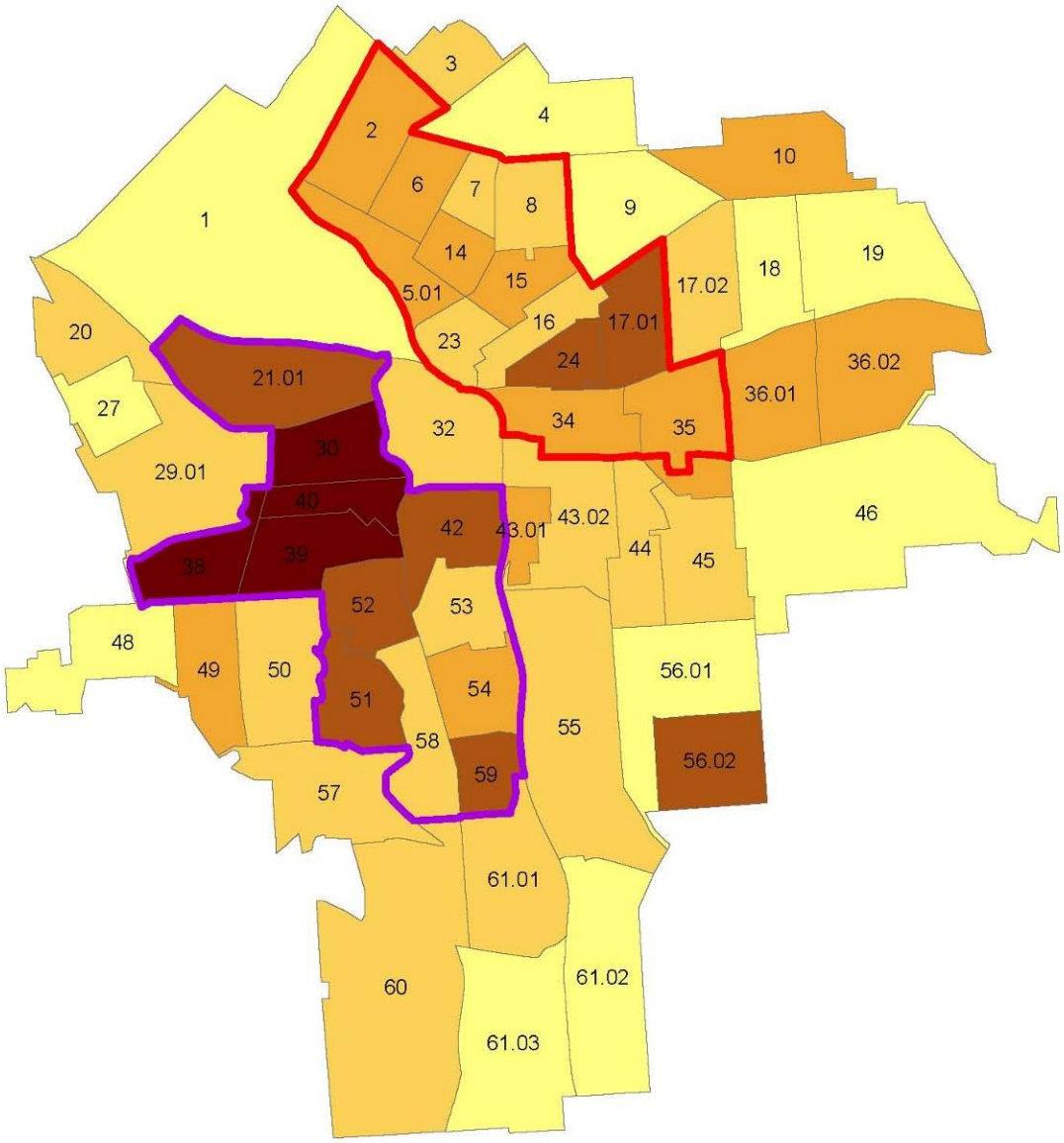
0 0.25 0.5 1 1.5 2 Miles

Northeast NRSA
Southwest NRSA

2010 Census
PercentAsi
0.1% - 1.1%
1.2% - 2.4%
2.5% - 6.2%
6.3% - 13.4%
13.5% - 25%

N

Neighborhood Revitalization Strategy Areas
Percent Hispanic



Map created by the City of Syracuse
Dept. of Neighborhood & Business Development
May 2011

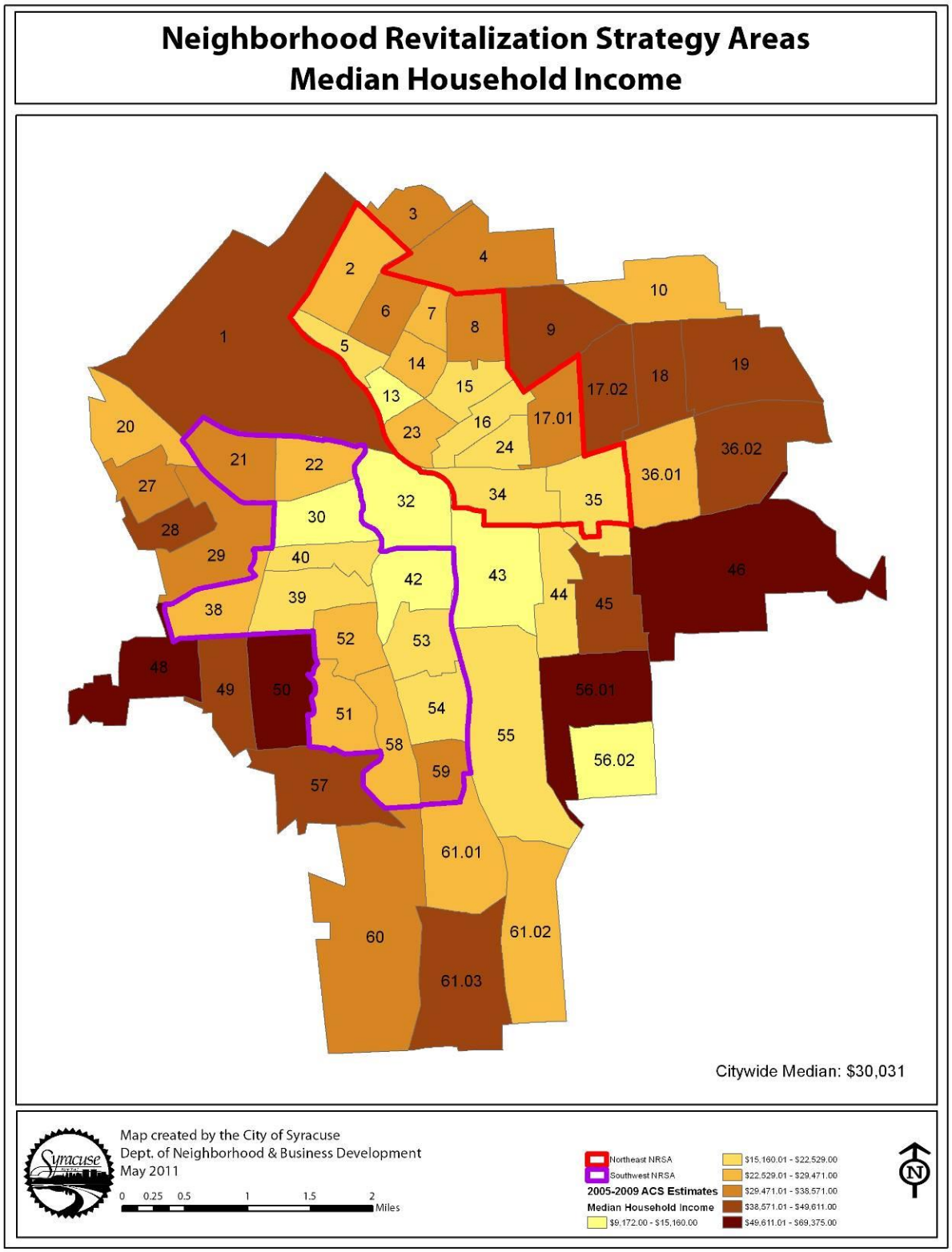
0 0.25 0.5 1 1.5 2 Miles

Northeast NRSA
Southwest NRSA

2010 Census
PerHispani
1.7% - 4.2%
4.3% - 6.8%
6.9% - 9.8%
9.9% - 14.2%
14.3% - 34.2%

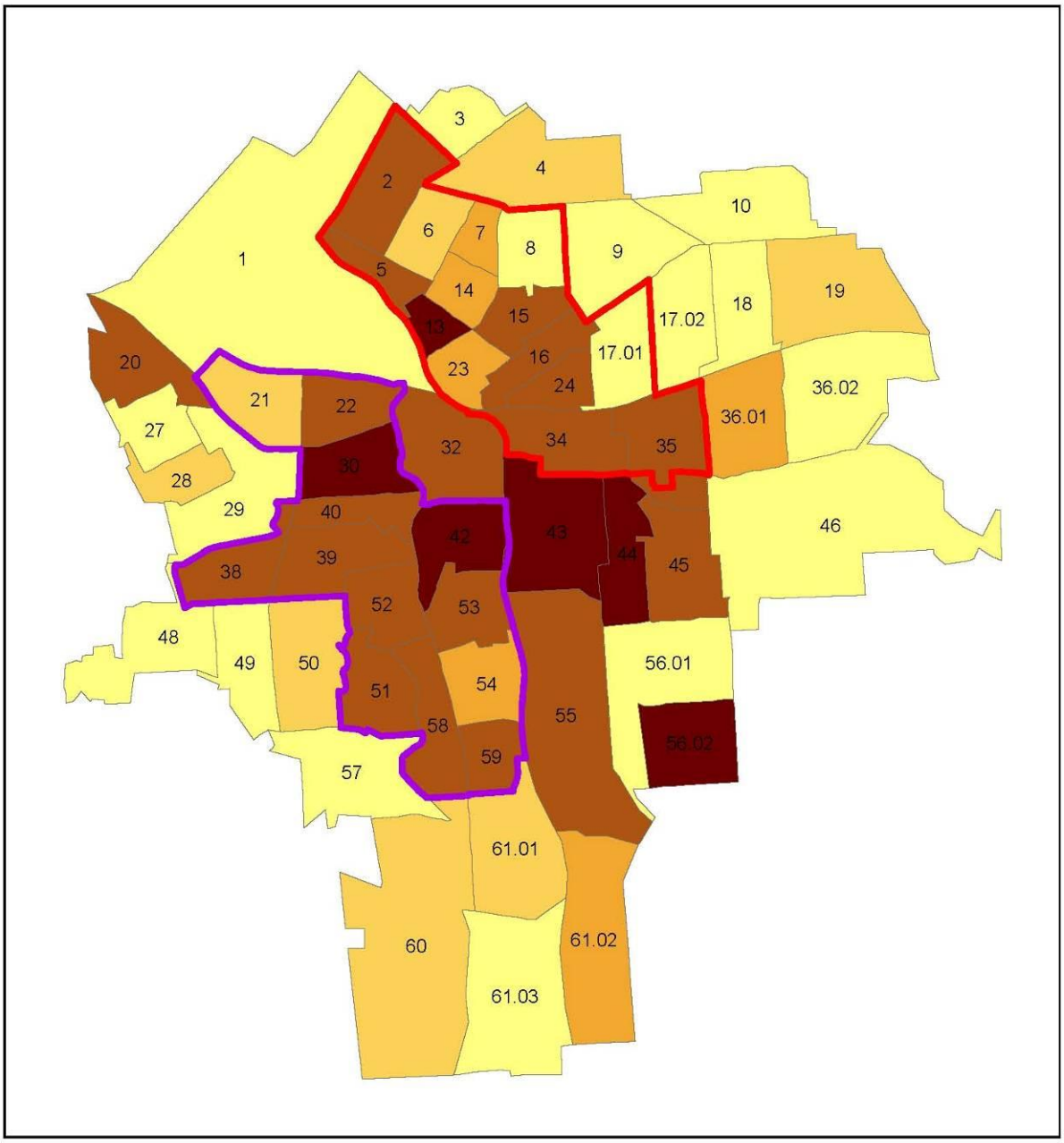
N

Appendix D – Income and Poverty Data[10]



[10] 2005-2009 ACS Estimates, U.S. Census

Neighborhood Revitalization Strategy Areas
Percent of Population Living Below the Poverty Line



Map created by the City of Syracuse
Dept. of Neighborhood & Business Development
May 2011

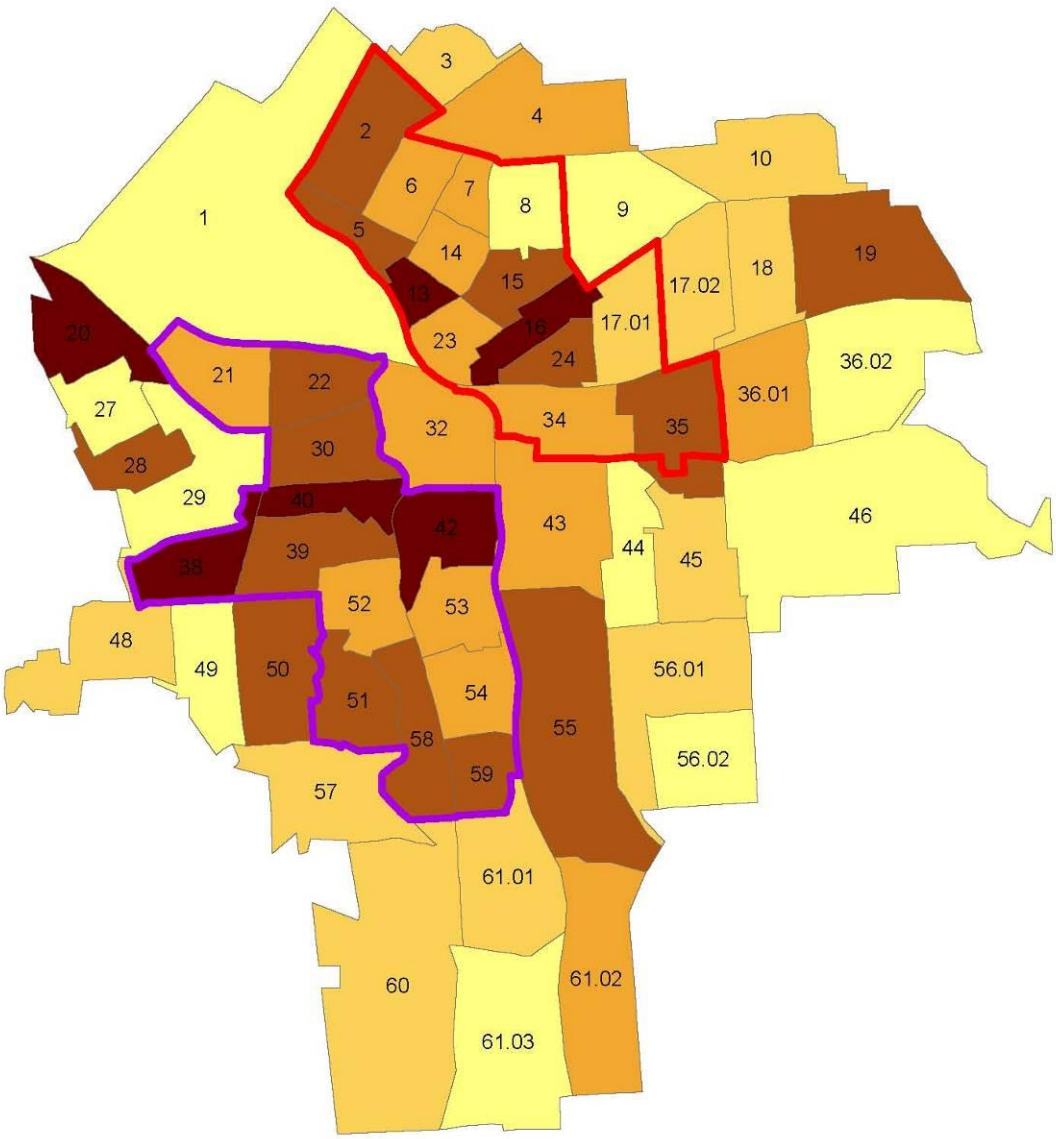
0 0.25 0.5 1 1.5 2 Miles

Northeast NRSA
Southwest NRSA
2005-2009 ACS Estimates

Poverty Rate
2.2% - 15.6%
15.7% - 25.3%
25.4% - 35.3%
35.4% - 53.8%
53.9% - 76.8%

N

Neighborhood Revitalization Strategy Areas
Percent of Children Living Below the Poverty Line



Map created by the City of Syracuse
Dept. of Neighborhood & Business Development
May 2011

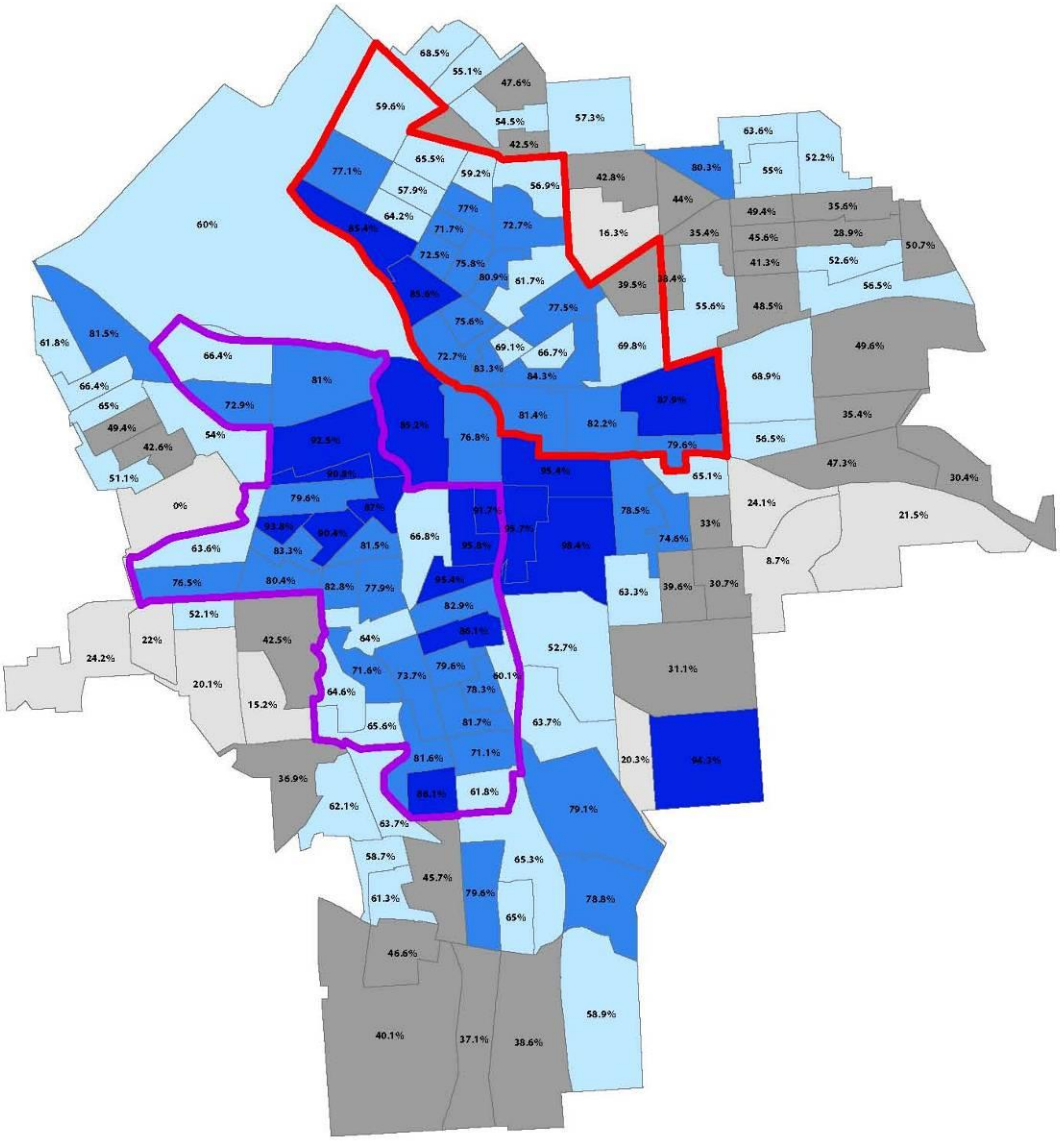
0 0.25 0.5 1 1.5 2 Miles

Northeast NRSA
Southwest NRSA
2005-2009 ACS Estimates

Percent of Children in Poverty
0% - 10.9%
11% - 27.7%
27.8% - 47.5%
47.6% - 70.2%
70.3% - 100%

N

Neighborhood Revitalization Strategy Areas
Percent of Persons LMI by Block Group



*HUD Data Released for 2011 corresponding to 2000 Block Group boundaries
http://www.hud.gov/offices/cpd/systems/census/ny/index.cfm

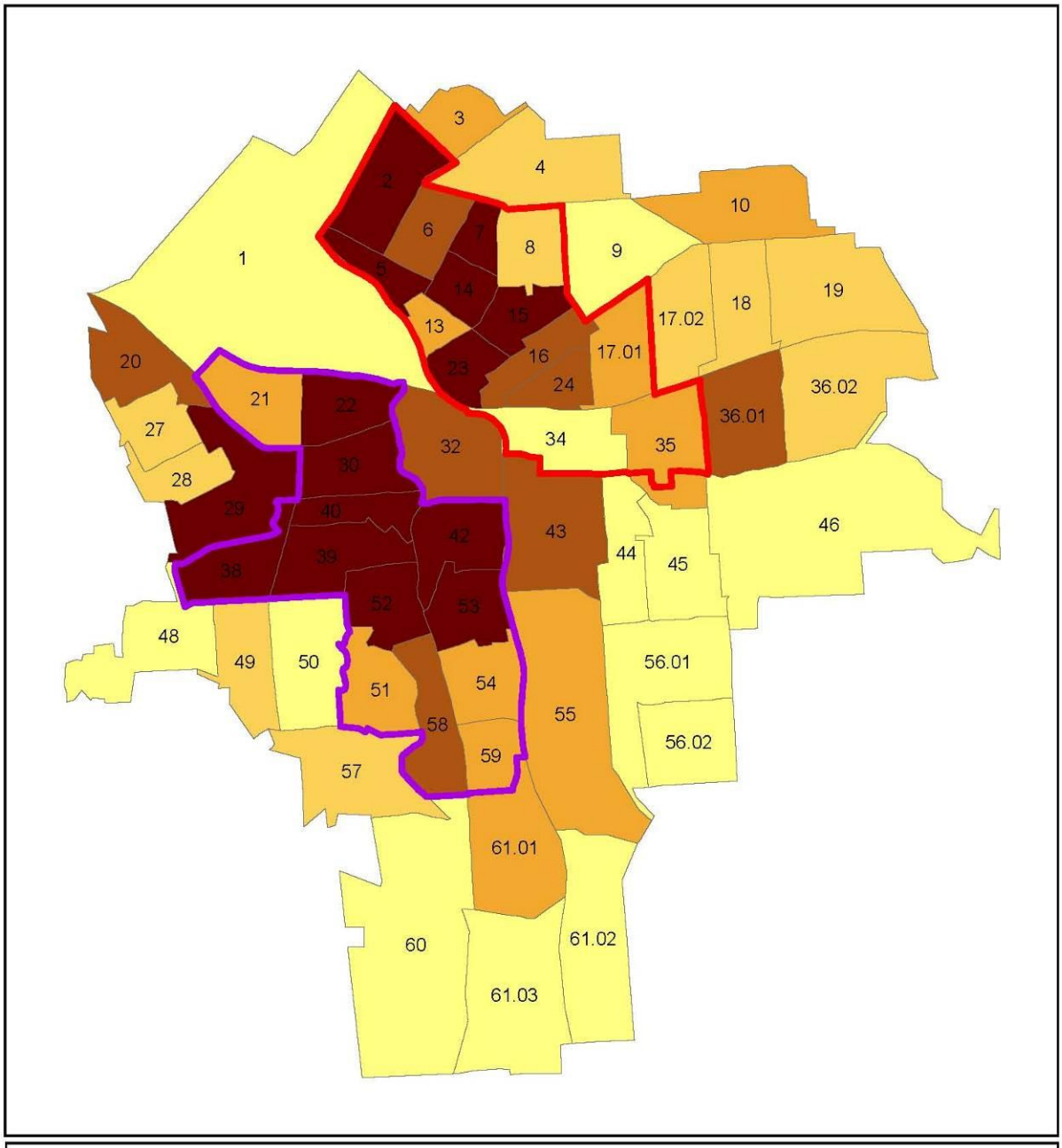
Map created by the City of Syracuse
Dept. of Neighborhood & Business Development
May 2011

0 0.25 0.5 1 1.5 2 Miles

Northeast NRSA
Southwest NRSA

2011 HUD LMI Data
LOWMODPCT
0% - 25%
25.1% - 51%
51.1% - 70%
70.1% - 85%
85.1% - 98.4%

Neighborhood Revitalization Strategy Areas
Adults over 25 without a High School Diploma



Map created by the City of Syracuse
Dept. of Neighborhood & Business Development
May 2011

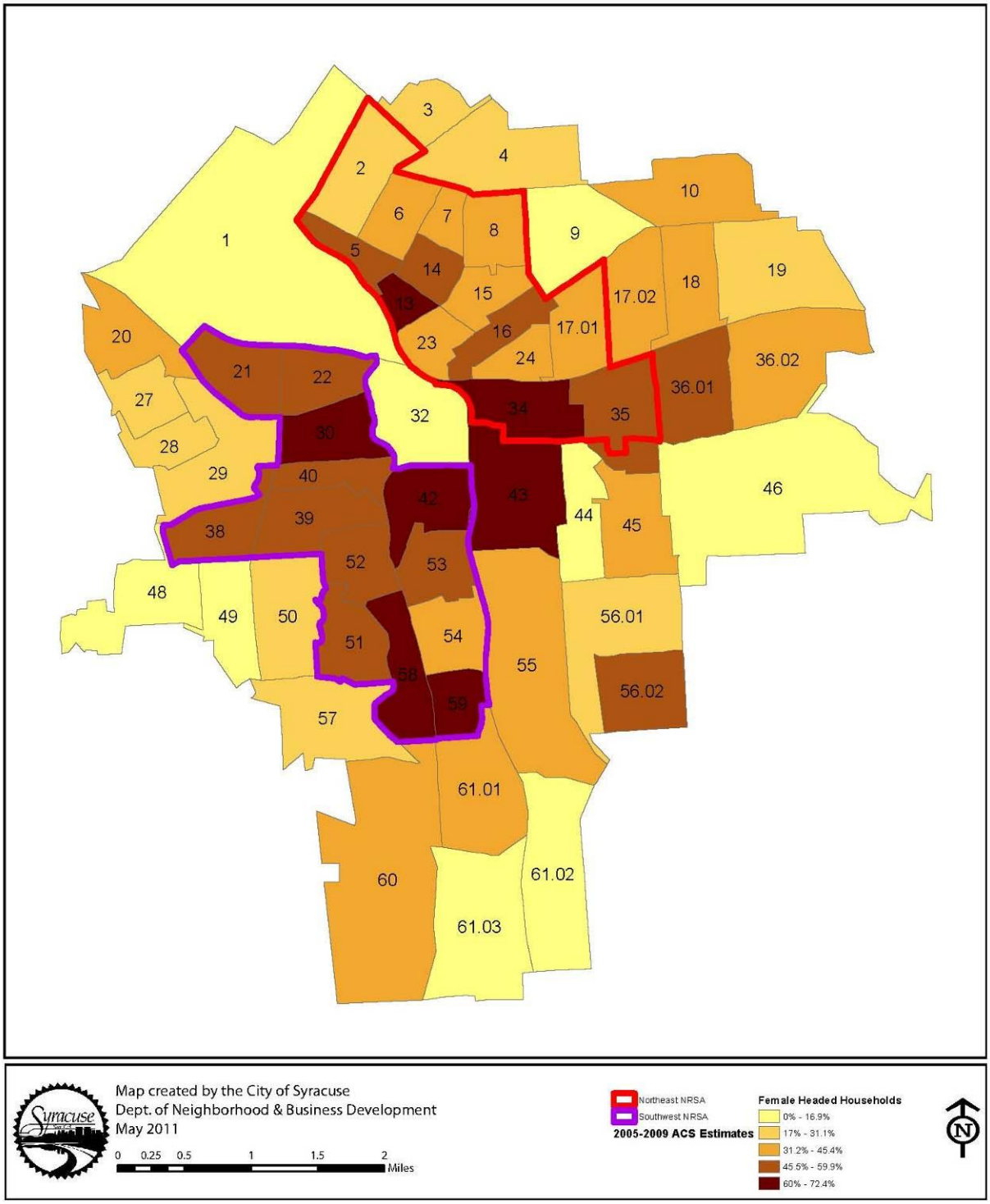
0 0.25 0.5 1 1.5 2 Miles

Northeast NRSA
Southwest NRSA
2005-2009 ACS Estimates

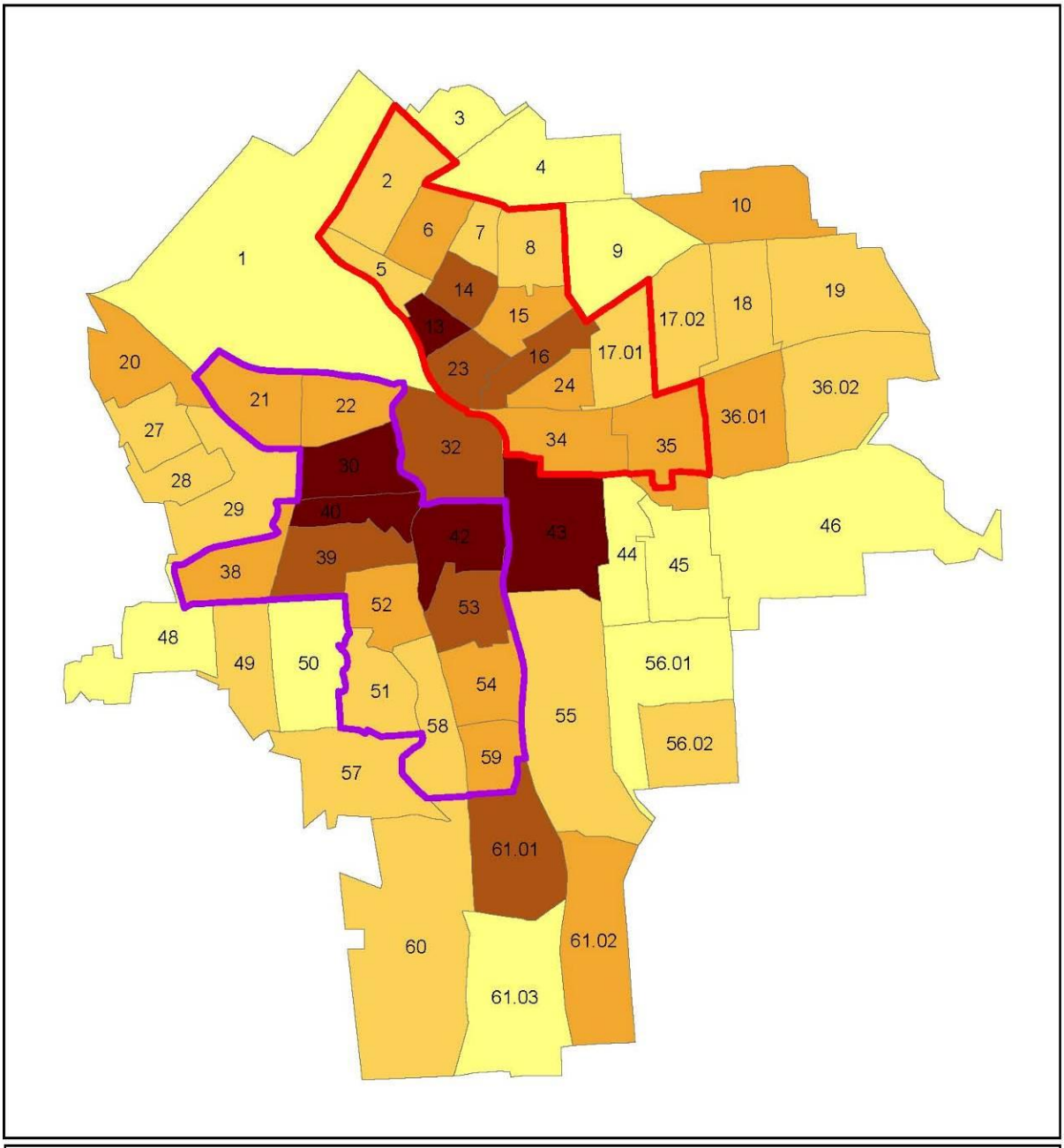
Percent No HS
0% - 9%
9.1% - 16.6%
16.7% - 23.2%
23.3% - 33.2%
33.3% - 53.8%

N

Neighborhood Revitalization Strategy Areas
Percent of Families that are Female Headed



Neighborhood Revitalization Strategy Areas
Percent of Households without Access to a Vehicle



Map created by the City of Syracuse
Dept. of Neighborhood & Business Development
May 2011

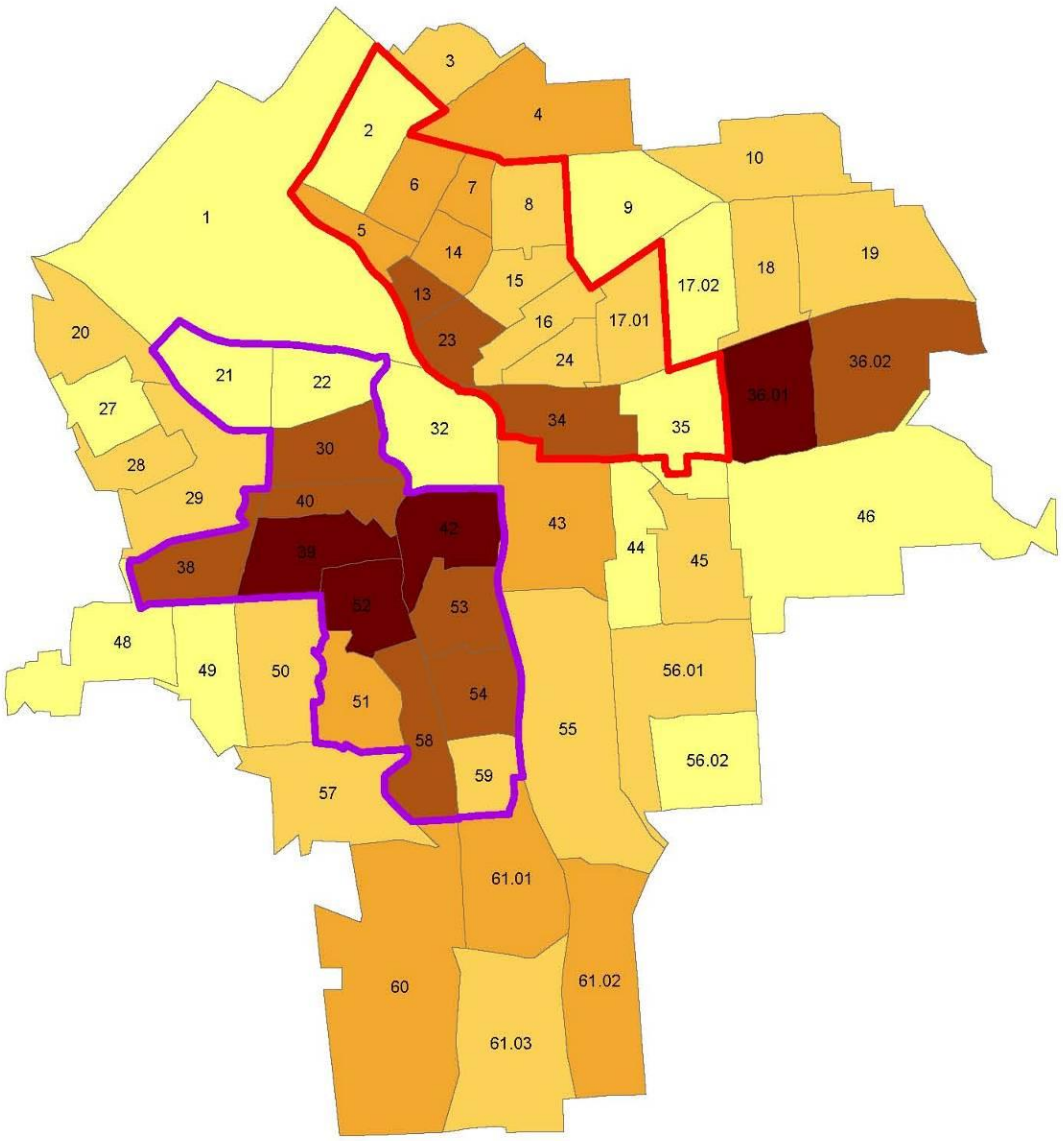
0 0.25 0.5 1 1.5 2 Miles

Northeast NRSA
Southwest NRSA
2005-2009 ACS Estimates

Households without Vehicle Access
2.9% - 11.7%
11.8% - 21.7%
21.8% - 37%
37.1% - 48.8%
48.9% - 71.3%

N

Neighborhood Revitalization Strategy Areas
Unemployment Rate



Map created by the City of Syracuse
Dept. of Neighborhood & Business Development
May 2011

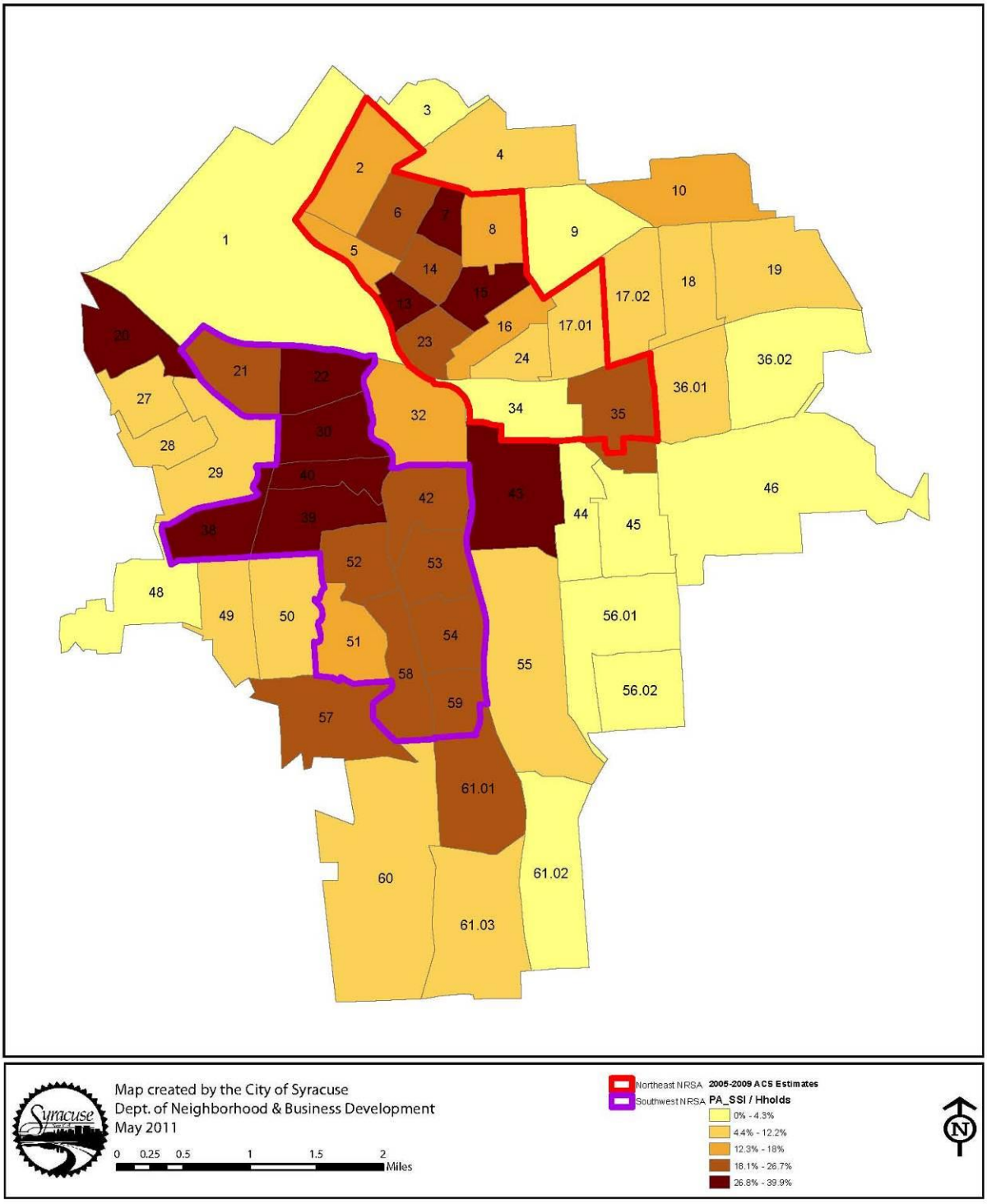
0 0.25 0.5 1 1.5 2 Miles

Northeast NRSA
Southwest NRSA

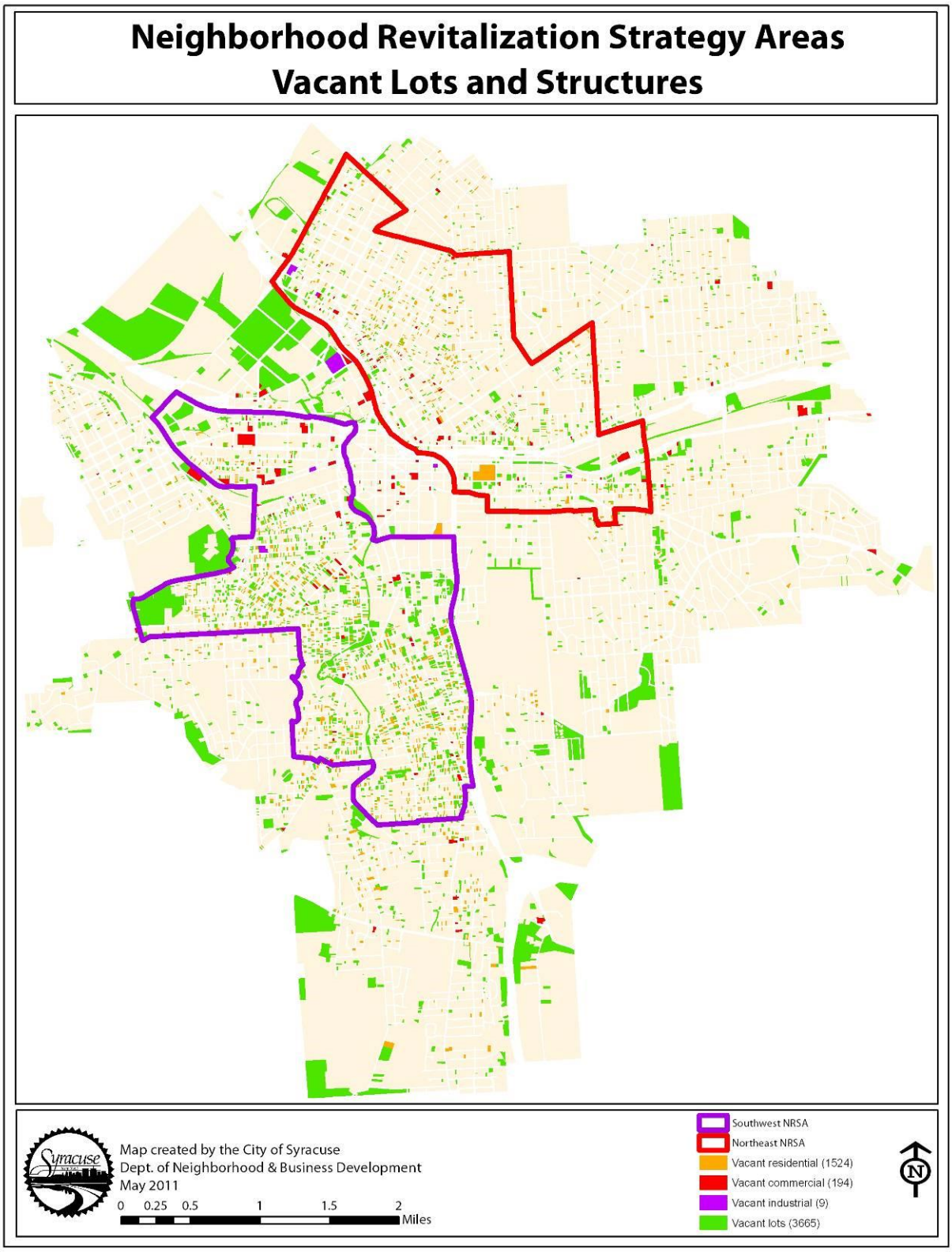
2005-2009 ACS Estimates
Unemployment Rate
1.2% - 4.9%
5% - 9.4%
9.5% - 13.3%
13.4% - 19.8%
19.9% - 28.6%

N

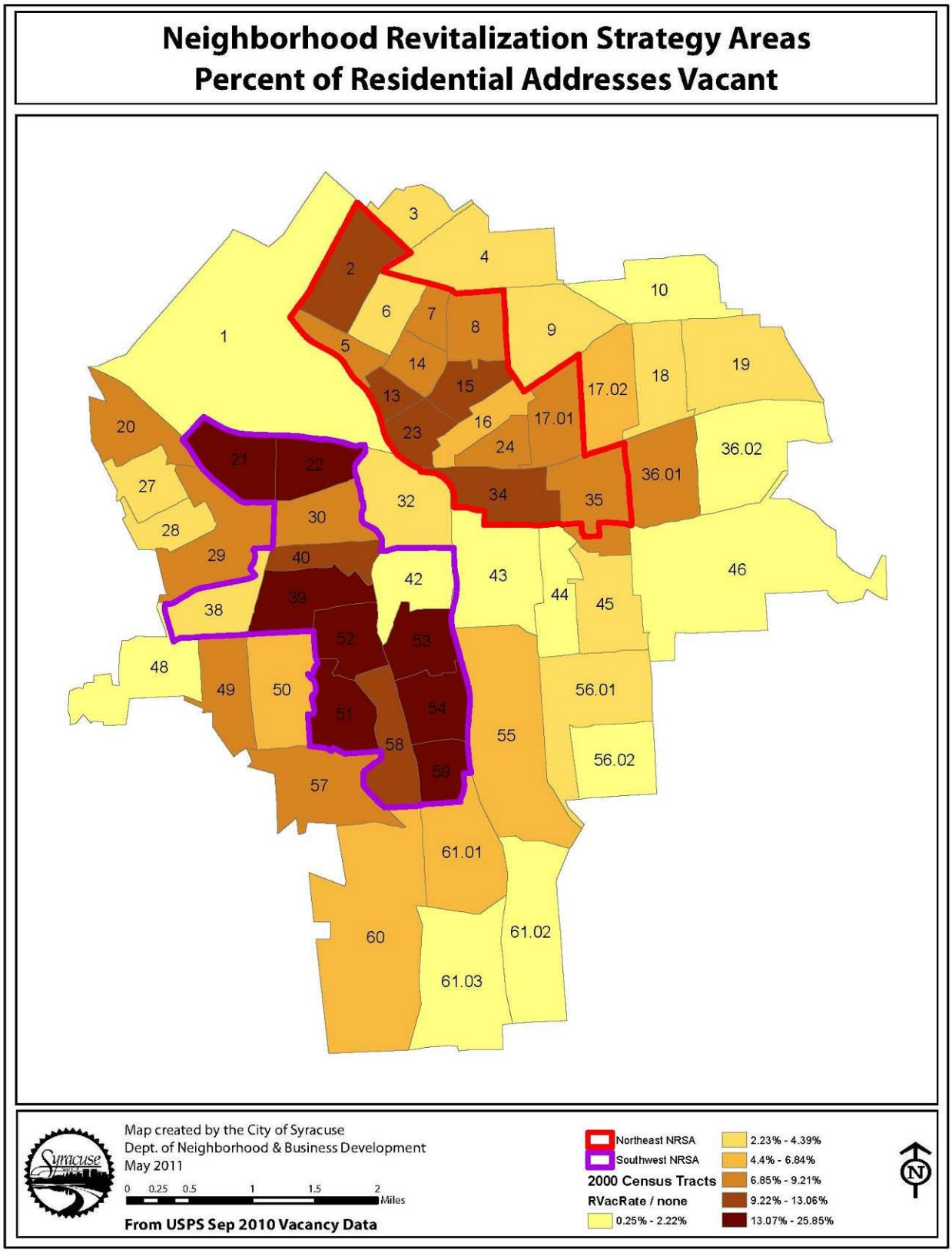
Neighborhood Revitalization Strategy Areas
Households Receiving Public Assistance/SSI



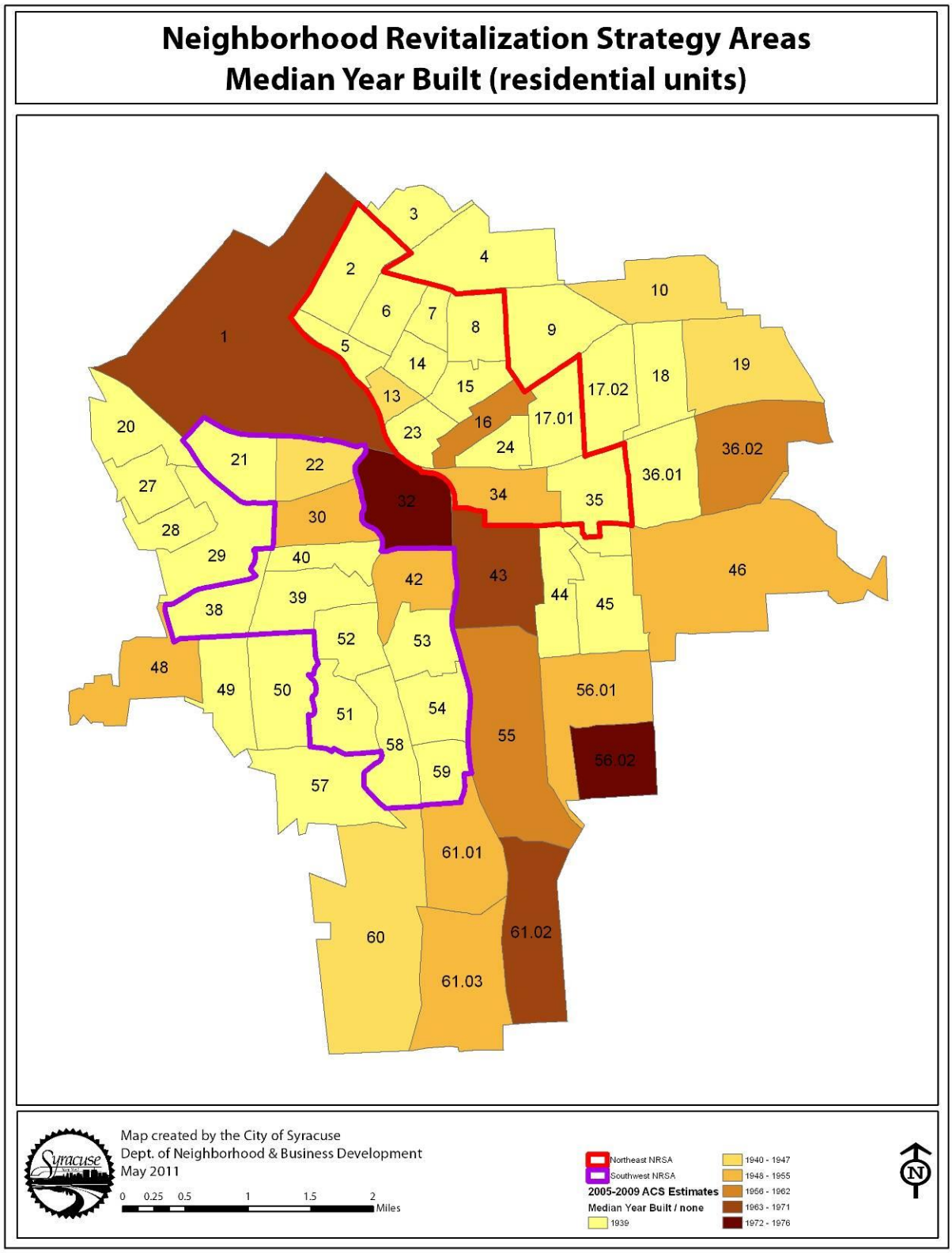
Appendix E – Housing Stock and Housing Market



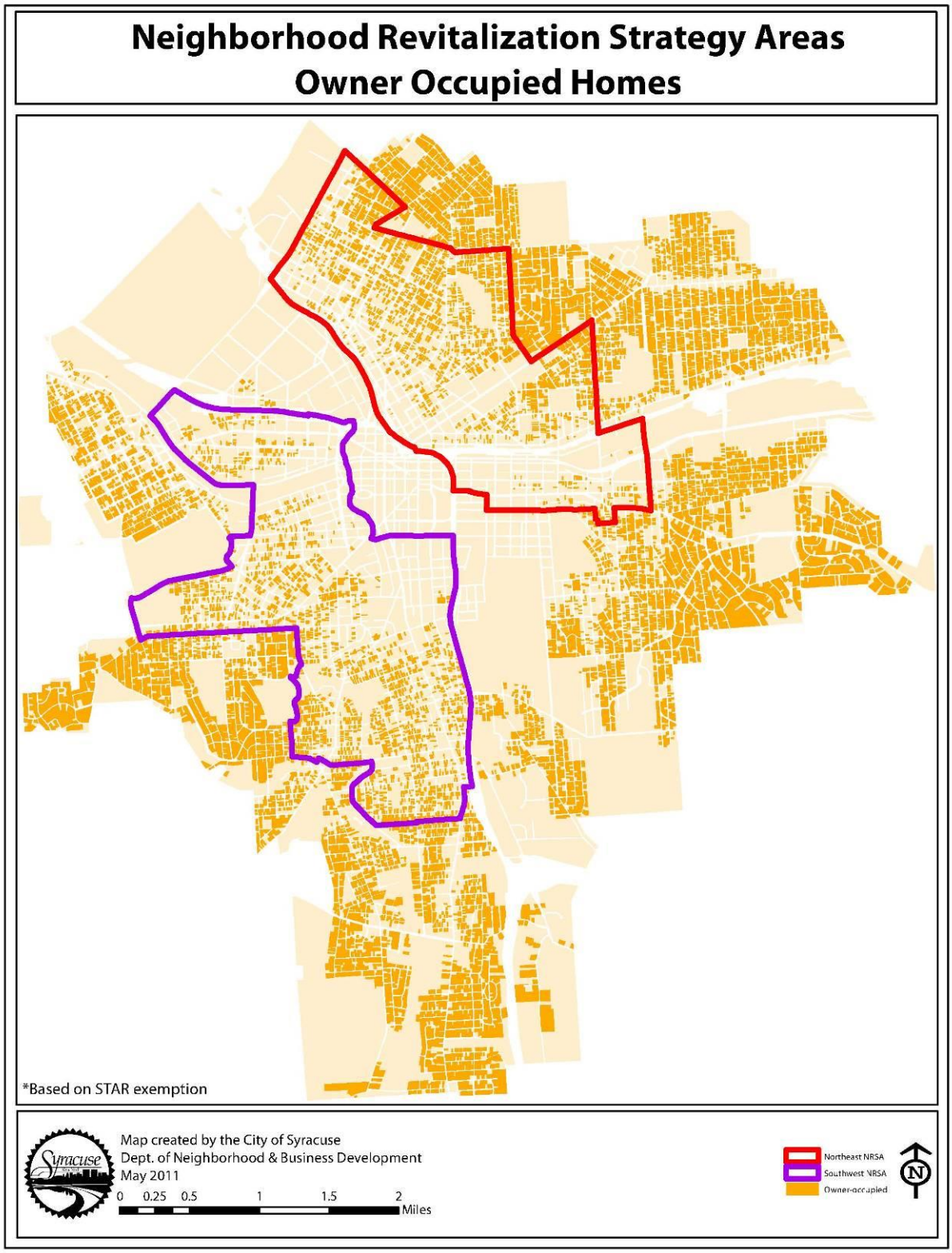
City Assessment Records; January, 2011



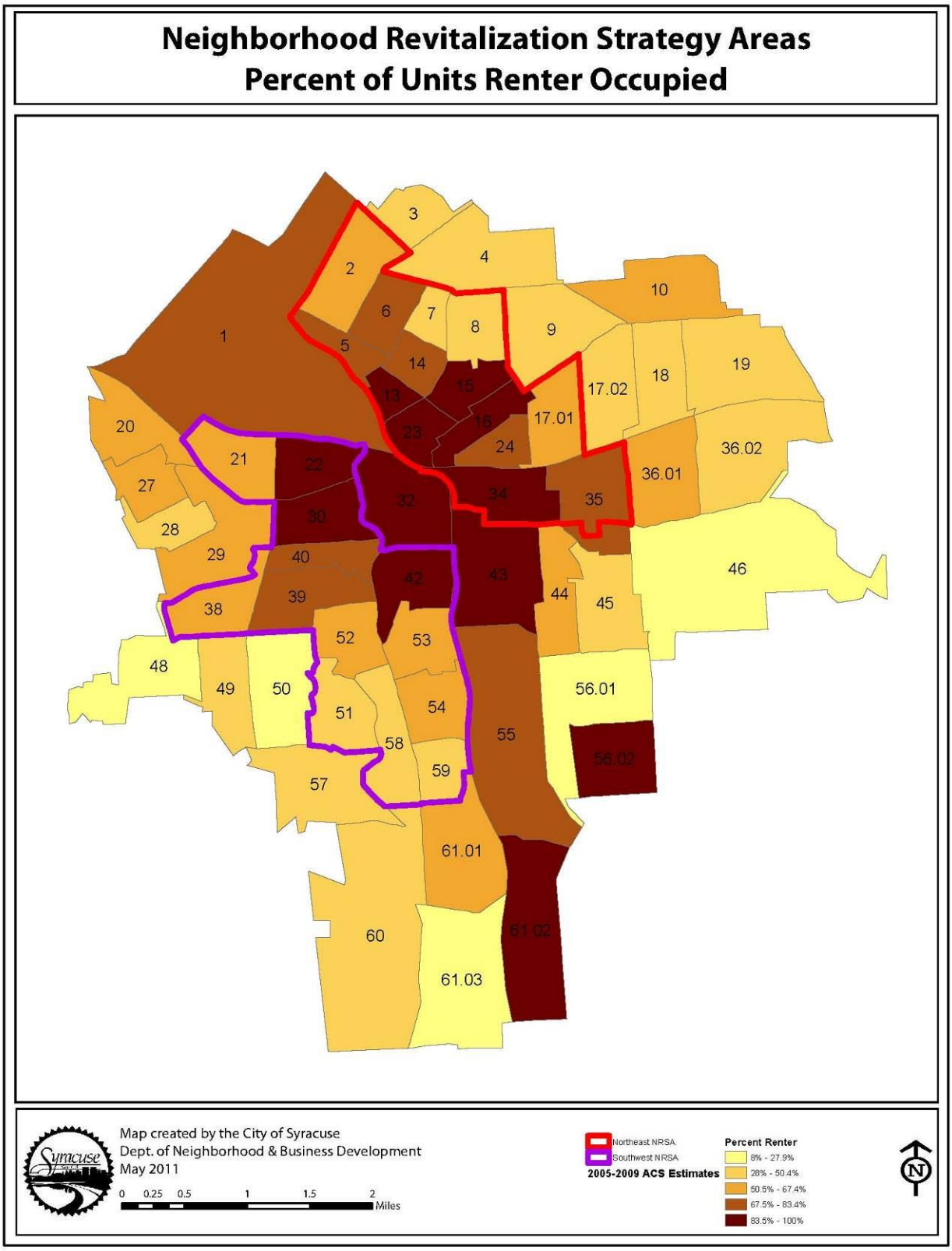
US Postal Service Data, Sep. 2010.



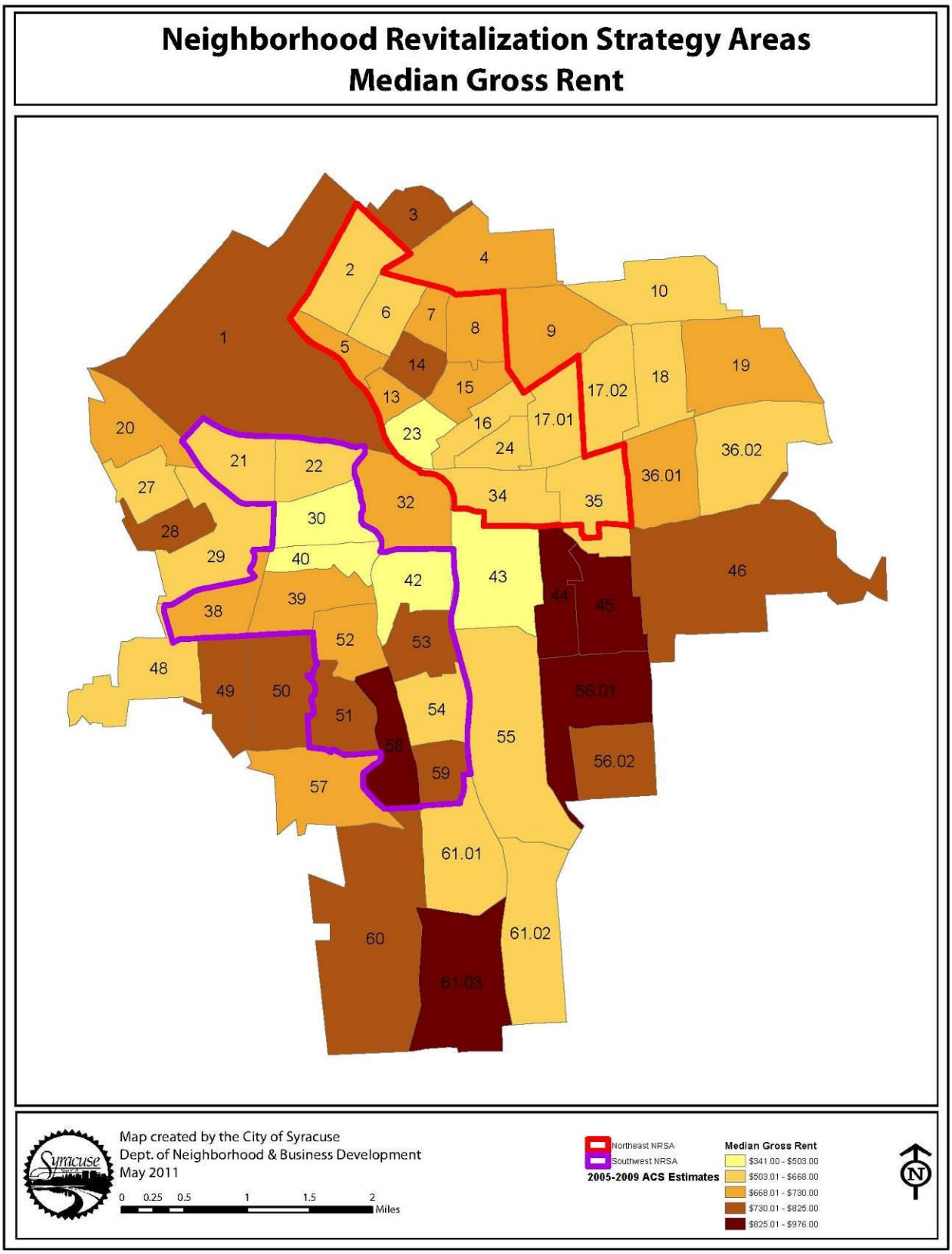
2005-2009 ACS Estimates; U.S. Census
Earliest year built recorded is 1939, skewing this map. Most housing stock within the NRSAs is pre-1900.



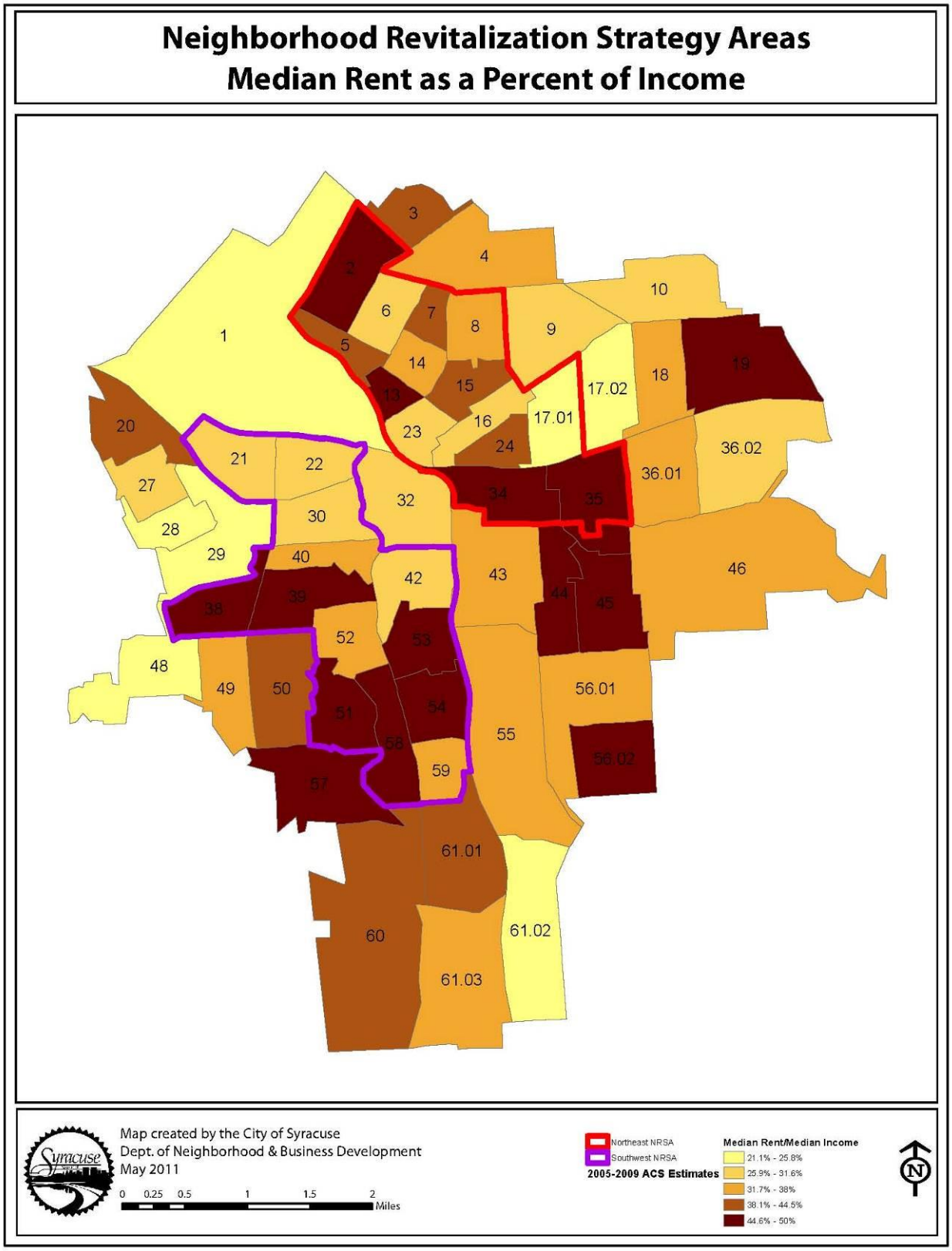
City Assessment Records, based on the STAR residential property tax exemption, only available to owner occupants.



2005-2009 ACS Estimates; U.S. Census



2005-2009 ACS Estimates; U.S. Census



2005-2009 ACS Estimates; U.S. Census

Appendix C

Agency Correspondence

C&S Companies
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

May 31, 2019

Ms. Vickie Pane
U.S. EPA Region 2
MS-225
2890 Woodbridge Ave.
Edison, New Jersey 08837-3679

Re: City of Syracuse Proposed Lead Ordinance
SEQR Lead Agency Status

Dear Ms. Pane,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. This letter serves as notification to all involved and interested agencies that the City is seeking lead agency status under SEQR for the proposed project.

In accordance with SEQR regulations, involved and interested agencies have 30 days to comment on the proposed City lead agency designation. We are treating this project as a Type I Action under SEQR. If your agency opposes the City's proposed status as lead agency, you have until June 8, 2019 to respond to the City's authorized consultant, C&S Engineers, Inc., in writing stating your opposition.

In an effort to maintain the project schedule, the City of Syracuse requests that if you concur with the proposed status, you sign the bottom of this letter and return it to C&S Engineers, Inc. on or before July 1, 2019.

C&S Engineers, Inc.
Attn: Bryan A. Bayer
499 Col Eileen Collins Blvd
Syracuse, New York 13212
Email: bbayer@cscos.com
Fax: 315-455-9667

It is the City's intent to issue a positive declaration under SEQR and prepare a Generic Environmental Impact Statement (GEIS) to evaluate the project's potential to impact the environment. Your agency will be kept informed throughout the SEQR process. If you have any questions or comments on the proposed action, please do not hesitate to contact me at (315) 455-2000.

Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

This agency concurs with the designation of the City of Syracuse as lead agency.

Involved/Interested Agency **Date**

Authorized Signature

C&S Companies
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

May 31, 2019

Mr. David Bimber
Regional Permit Administrator
NYSDEC Region 7
615 Erie Blvd. West, Room 206
Syracuse, New York 13204-2400

Re: City of Syracuse Proposed Lead Ordinance
SEQR Lead Agency Status

Dear Mr. Bimber,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. This letter serves as notification to all involved and interested agencies that the City is seeking lead agency status under SEQR for the proposed project.

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Syracuse, New York 13212
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Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

This agency concurs with the designation of the City of Syracuse as lead agency.

Involved/Interested Agency **Date**

Authorized Signature

C&S Companies
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

May 31, 2019

Dr. Howard Zucker, M.D., J.D.
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, New York 12237

Re: City of Syracuse Proposed Lead Ordinance
SEQR Lead Agency Status

Dear Dr. Zucker,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. This letter serves as notification to all involved and interested agencies that the City is seeking lead agency status under SEQR for the proposed project.

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Syracuse, New York 13212
Email: bbayer@cscos.com
Fax: 315-455-9667

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Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

This agency concurs with the designation of the City of Syracuse as lead agency.

Involved/Interested Agency **Date**

Authorized Signature

C&S Companies
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

May 31, 2019

Mr. Travis Glazier
Onondaga County Office of the Environment
John H. Mulroy Civic Center
421 Montgomery Street, 14th Floor
Syracuse, New York 13202

Re: City of Syracuse Proposed Lead Ordinance
SEQR Lead Agency Status

Dear Mr. Glazier,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. This letter serves as notification to all involved and interested agencies that the City is seeking lead agency status under SEQR for the proposed project.

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Attn: Bryan A. Bayer
499 Col Eileen Collins Blvd
Syracuse, New York 13212
Email: bbayer@cscos.com
Fax: 315-455-9667

It is the City's intent to issue a positive declaration under SEQR and prepare a Generic Environmental Impact Statement (GEIS) to evaluate the project's potential to impact the environment. Your agency will be kept informed throughout the SEQR process. If you have any questions or comments on the proposed action, please do not hesitate to contact me at (315) 455-2000.

Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

This agency concurs with the designation of the City of Syracuse as lead agency.

Involved/Interested Agency **Date**

Authorized Signature

C&S Companies
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

May 31, 2019

Dr. Indu Gupta, MD, MPH
Commissioner of Health
John H. Mulroy Civic Center
421 Montgomery Street
Syracuse, New York 13202

Re: City of Syracuse Proposed Lead Ordinance
SEQR Lead Agency Status

Dear Dr. Gupta,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. This letter serves as notification to all involved and interested agencies that the City is seeking lead agency status under SEQR for the proposed project.

In accordance with SEQR regulations, involved and interested agencies have 30 days to comment on the proposed City lead agency designation. We are treating this project as a Type I Action under SEQR. If your agency opposes the City's proposed status as lead agency, you have until June 8, 2019 to respond to the City's authorized consultant, C&S Engineers, Inc., in writing stating your opposition.

In an effort to maintain the project schedule, the City of Syracuse requests that if you concur with the proposed status, you sign the bottom of this letter and return it to C&S Engineers, Inc. on or before July 1, 2019.

C&S Engineers, Inc.
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499 Col Eileen Collins Blvd
Syracuse, New York 13212
Email: bbayer@cscos.com
Fax: 315-455-9667

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Managing Environmental Scientist

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cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

This agency concurs with the designation of the City of Syracuse as lead agency.

Involved/Interested Agency **Date**

Authorized Signature

Instructions for Completing Part 1

Part 1 is to be completed by the applicant or project sponsor. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification.

Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information; indicate whether missing information does not exist, or is not reasonably available to the sponsor; and, when possible, generally describe work or studies which would be necessary to update or fully develop that information.

Applicants/sponsors must complete all items in Sections A & B. In Sections C, D & E, most items contain an initial question that must be answered either "Yes" or "No". If the answer to the initial question is "Yes", complete the sub-questions that follow. If the answer to the initial question is "No", proceed to the next question. Section F allows the project sponsor to identify and attach any additional information. Section G requires the name and signature of the applicant or project sponsor to verify that the information contained in Part 1is accurate and complete.

A. Project and Applicant/Sponsor Information.

Name of Action or Project: City of Syracuse Proposed Lead Ordinance		
Project Location (describe, and attach a general location map): The action involves introduction of a citywide Ordinance through the City of Syracuse, Onondaga County, New York (See Figure 1).		
Brief Description of Proposed Action (include purpose or need): The City of Syracuse is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed.		
Name of Applicant/Sponsor: Hon. Ben Walsh, City of Syracuse	Telephone: (315) 448-8005 E-Mail: mayor@syrgov.net	
Address: 233 E. Washington Street, Suite 203		
City/PO: Syracuse	State: NY	Zip Code: 13202
Project Contact (if not same as sponsor; give name and title/role): Ms. Stephanie Pasquale, Dept. of Neighborhood and Bus. Development	Telephone: (315) 448-8109 E-Mail: spasquale@syrgov.net	
Address: 201 E. Washington Street, 6th Floor		
City/PO: Syracuse	State: NY	Zip Code: 13202
Property Owner (if not same as sponsor): Varies	Telephone: E-Mail:	
Address:		
City/PO:	State:	Zip Code:

B. Government Approvals

B. Government Approvals, Funding, or Sponsorship. ("Funding" includes grants, loans, tax relief, and any other forms of financial assistance.)

Government Entity	If Yes: Identify Agency and Approval(s) Required	Application Date (Actual or projected)
a. City Counsel, Town Board, or Village Board of Trustees ☑Yes ☐No	City of Syracuse Common Council Approval	To be determined
b. City, Town or Village Planning Board or Commission ☐Yes ☑No		
c. City, Town or Village Zoning Board of Appeals ☐Yes ☑No		
d. Other local agencies ☐Yes ☑No		
e. County agencies ☐Yes ☑No		
f. Regional agencies ☐Yes ☑No		
g. State agencies ☐Yes ☑No		
h. Federal agencies ☐Yes ☑No		

i. Coastal Resources.

i. Is the project site within a Coastal Area, or the waterfront area of a Designated Inland Waterway? ☐Yes ☑No

ii. Is the project site located in a community with an approved Local Waterfront Revitalization Program? ☑Yes ☐No

iii. Is the project site within a Coastal Erosion Hazard Area? ☐Yes ☑No

C. Planning and Zoning

C.1. Planning and zoning actions.

Will administrative or legislative adoption, or amendment of a plan, local law, ordinance, rule or regulation be the only approval(s) which must be granted to enable the proposed action to proceed? ☐Yes ☑No

- **If Yes,** complete sections C, F and G.
- **If No,** proceed to question C.2 and complete all remaining sections and questions in Part 1

C.2. Adopted land use plans.

a. Do any municipally- adopted (city, town, village or county) comprehensive land use plan(s) include the site where the proposed action would be located? ☑Yes ☐No

If Yes, does the comprehensive plan include specific recommendations for the site where the proposed action would be located? ☑Yes ☐No

b. Is the site of the proposed action within any local or regional special planning district (for example: Greenway; Brownfield Opportunity Area (BOA); designated State or Federal heritage area; watershed management plan; or other?) ☑Yes ☐No

If Yes, identify the plan(s):

The City of Syracuse provides multiple special planning districts including Brownfield Opportunity Areas and a Local Waterfront Revitalization Program. Portions of the Erie Canalway National Heritage Corridor occur within the City of Syracuse.

c. Is the proposed action located wholly or partially within an area listed in an adopted municipal open space plan, or an adopted municipal farmland protection plan? ☐Yes ☑No

If Yes, identify the plan(s):

Open space areas occur throughout the City of Syracuse; however, the proposed lead ordinance will involve pre-1978 development and will not result in work in adopted open space areas. No farmland protection plans occur within the City limits.

C.3. Zoning

a. Is the site of the proposed action located in a municipality with an adopted zoning law or ordinance. ☑ Yes ☐ No
If Yes, what is the zoning classification(s) including any applicable overlay district?
Varies citywide

b. Is the use permitted or allowed by a special or conditional use permit? ☐ Yes ☑ No

c. Is a zoning change requested as part of the proposed action? ☐ Yes ☑ No
If Yes,
i. What is the proposed new zoning for the site? _____

C.4. Existing community services.

a. In what school district is the project site located? Syracuse City School District

b. What police or other public protection forces serve the project site?
City of Syracuse Police

c. Which fire protection and emergency medical services serve the project site?
City of Syracuse Fire Department, TLC Medical Transport, East Area Volunteer Emergency, Crouse Hosptial Emergency, Upstate Emergency Medicine

d. What parks serve the project site?
The City of Syracuse Parks Department operates 52 parks throughout the City.

D. Project Details

D.1. Proposed and Potential Development

a. What is the general nature of the proposed action (e.g., residential, industrial, commercial, recreational; if mixed, include all components)? Residential/nonresidential structures

b. a. Total acreage of the site of the proposed action? Varies acres
b. Total acreage to be physically disturbed? Varies acres
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? Varies acres

c. Is the proposed action an expansion of an existing project or use? ☐ Yes ☑ No
i. If Yes, what is the approximate percentage of the proposed expansion and identify the units (e.g., acres, miles, housing units, square feet)? % _____ Units: _____

d. Is the proposed action a subdivision, or does it include a subdivision? ☐ Yes ☑ No
If Yes,
i. Purpose or type of subdivision? (e.g., residential, industrial, commercial; if mixed, specify types)
_____
ii. Is a cluster/conservation layout proposed? ☐ Yes ☐ No
iii. Number of lots proposed? _____
iv. Minimum and maximum proposed lot sizes? Minimum _____ Maximum _____

e. Will the proposed action be constructed in multiple phases? ☐ Yes ☑ No
i. If No, anticipated period of construction: _____ months
ii. If Yes:
- Total number of phases anticipated _____
- Anticipated commencement date of phase 1 (including demolition) _____ month _____ year
- Anticipated completion date of final phase _____ month _____year
- Generally describe connections or relationships among phases, including any contingencies where progress of one phase may determine timing or duration of future phases: _____

f. Does the project include new residential uses? ☐Yes ☑No
If Yes, show numbers of units proposed.

	One Family	Two Family	Three Family	Multiple Family (four or more)
Initial Phase	_____	_____	_____	_____
At completion of all phases	_____	_____	_____	_____

g. Does the proposed action include new non-residential construction (including expansions)? ☐Yes ☑No
If Yes,
i. Total number of structures _____
ii. Dimensions (in feet) of largest proposed structure: _____height; _____width; and _____ length
iii. Approximate extent of building space to be heated or cooled: _____ square feet

h. Does the proposed action include construction or other activities that will result in the impoundment of any liquids, such as creation of a water supply, reservoir, pond, lake, waste lagoon or other storage? ☐Yes ☑No
If Yes,
i. Purpose of the impoundment: _____
ii. If a water impoundment, the principal source of the water: ☐ Ground water ☐ Surface water streams ☐Other specify:
_____
iii. If other than water, identify the type of impounded/contained liquids and their source.
_____
iv. Approximate size of the proposed impoundment. Volume: _____ million gallons; surface area: _____ acres
v. Dimensions of the proposed dam or impounding structure: _____ height; _____ length
vi. Construction method/materials for the proposed dam or impounding structure (e.g., earth fill, rock, wood, concrete):
_____

D.2. Project Operations

a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both? ☐Yes ☑No
(Not including general site preparation, grading or installation of utilities or foundations where all excavated materials will remain onsite)
If Yes:
i .What is the purpose of the excavation or dredging? _____
ii. How much material (including rock, earth, sediments, etc.) is proposed to be removed from the site?
- Volume (specify tons or cubic yards): _____
- Over what duration of time? _____

iii. Describe nature and characteristics of materials to be excavated or dredged, and plans to use, manage or dispose of them.
_____
_____
iv. Will there be onsite dewatering or processing of excavated materials? ☐Yes ☐No
If yes, describe. _____
_____
v. What is the total area to be dredged or excavated? _____acres
vi. What is the maximum area to be worked at any one time? _____ acres
vii. What would be the maximum depth of excavation or dredging? _____ feet
viii. Will the excavation require blasting? ☐Yes ☐No
ix. Summarize site reclamation goals and plan: _____
_____
_____

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment into any existing wetland, waterbody, shoreline, beach or adjacent area? ☐Yes ☑No
If Yes:
i. Identify the wetland or waterbody which would be affected (by name, water index number, wetland map number or geographic description): _____
_____

ii. Describe how the proposed action would affect that waterbody or wetland, e.g. excavation, fill, placement of structures, or alteration of channels, banks and shorelines. Indicate extent of activities, alterations and additions in square feet or acres:

_____

_____

_____

_____

iii. Will the proposed action cause or result in disturbance to bottom sediments? ☐Yes ☐No

If Yes, describe: _____

iv. Will the proposed action cause or result in the destruction or removal of aquatic vegetation? ☐ Yes ☐No

If Yes:

- acres of aquatic vegetation proposed to be removed: _____
- expected acreage of aquatic vegetation remaining after project completion: _____
- purpose of proposed removal (e.g. beach clearing, invasive species control, boat access): _____

  _____
- proposed method of plant removal: _____
- if chemical/herbicide treatment will be used, specify product(s): _____

v. Describe any proposed reclamation/mitigation following disturbance: _____

_____

c. Will the proposed action use, or create a new demand for water? ☐Yes ☑No

If Yes:

i. Total anticipated water usage/demand per day: _____ gallons/day

ii. Will the proposed action obtain water from an existing public water supply? ☐Yes ☐No

If Yes:

- Name of district or service area: _____
- Does the existing public water supply have capacity to serve the proposal? ☐ Yes ☐ No
- Is the project site in the existing district? ☐ Yes ☐ No
- Is expansion of the district needed? ☐ Yes ☐ No
- Do existing lines serve the project site? ☐ Yes ☐ No

iii. Will line extension within an existing district be necessary to supply the project? ☐Yes ☐No

If Yes:

- Describe extensions or capacity expansions proposed to serve this project: _____

  _____
- Source(s) of supply for the district: _____

iv. Is a new water supply district or service area proposed to be formed to serve the project site? ☐ Yes ☐No

If, Yes:

- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- Proposed source(s) of supply for new district: _____

v. If a public water supply will not be used, describe plans to provide water supply for the project: _____

_____

vi. If water supply will be from wells (public or private), what is the maximum pumping capacity: _____ gallons/minute.

d. Will the proposed action generate liquid wastes? ☐ Yes ☑No

If Yes:

i. Total anticipated liquid waste generation per day: _____ gallons/day

ii. Nature of liquid wastes to be generated (e.g., sanitary wastewater, industrial; if combination, describe all components and approximate volumes or proportions of each): _____

_____

_____

iii. Will the proposed action use any existing public wastewater treatment facilities? ☐Yes ☐No

If Yes:

- Name of wastewater treatment plant to be used: _____
- Name of district: _____
- Does the existing wastewater treatment plant have capacity to serve the project? ☐Yes ☐No
- Is the project site in the existing district? ☐Yes ☐No
- Is expansion of the district needed? ☐Yes ☐No

- Do existing sewer lines serve the project site? ☐Yes ☐No
- Will a line extension within an existing district be necessary to serve the project? ☐Yes ☐No

  If Yes:
  - Describe extensions or capacity expansions proposed to serve this project: _____

iv. Will a new wastewater (sewage) treatment district be formed to serve the project site? ☐Yes ☐No

If Yes:
- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- What is the receiving water for the wastewater discharge? _____

v. If public facilities will not be used, describe plans to provide wastewater treatment for the project, including specifying proposed receiving water (name and classification if surface discharge or describe subsurface disposal plans):

_____

vi. Describe any plans or designs to capture, recycle or reuse liquid waste: _____

e. Will the proposed action disturb more than one acre and create stormwater runoff, either from new point sources (i.e. ditches, pipes, swales, curbs, gutters or other concentrated flows of stormwater) or non-point source (i.e. sheet flow) during construction or post construction? ☐Yes ☑No

If Yes:

i. How much impervious surface will the project create in relation to total size of project parcel?

_____ Square feet or _____ acres (impervious surface)

_____ Square feet or _____ acres (parcel size)

ii. Describe types of new point sources. _____

iii. Where will the stormwater runoff be directed (i.e. on-site stormwater management facility/structures, adjacent properties, groundwater, on-site surface water or off-site surface waters)?

_____

- If to surface waters, identify receiving water bodies or wetlands: _____
- Will stormwater runoff flow to adjacent properties? ☐Yes ☐No

iv. Does the proposed plan minimize impervious surfaces, use pervious materials or collect and re-use stormwater? ☐Yes ☐No

f. Does the proposed action include, or will it use on-site, one or more sources of air emissions, including fuel combustion, waste incineration, or other processes or operations? ☑Yes ☐No

If Yes, identify:

i. Mobile sources during project operations (e.g., heavy equipment, fleet or delivery vehicles)

City vehicles will be used during inspection activities.

ii. Stationary sources during construction (e.g., power generation, structural heating, batch plant, crushers)

None

iii. Stationary sources during operations (e.g., process emissions, large boilers, electric generation)

None

g. Will any air emission sources named in D.2.f (above), require a NY State Air Registration, Air Facility Permit, or Federal Clean Air Act Title IV or Title V Permit? ☐Yes ☑No

If Yes:

i. Is the project site located in an Air quality non-attainment area? (Area routinely or periodically fails to meet ambient air quality standards for all or some parts of the year) ☐Yes ☐No

ii. In addition to emissions as calculated in the application, the project will generate:
- _____Tons/year (short tons) of Carbon Dioxide (CO_2)
- _____Tons/year (short tons) of Nitrous Oxide (N_2O)
- _____Tons/year (short tons) of Perfluorocarbons (PFCs)
- _____Tons/year (short tons) of Sulfur Hexafluoride (SF_6)
- _____Tons/year (short tons) of Carbon Dioxide equivalent of Hydroflourocarbons (HFCs)
- _____Tons/year (short tons) of Hazardous Air Pollutants (HAPs)

h. Will the proposed action generate or emit methane (including, but not limited to, sewage treatment plants, landfills, composting facilities)? ☐Yes ☑No

If Yes:

i. Estimate methane generation in tons/year (metric): _____

ii. Describe any methane capture, control or elimination measures included in project design (e.g., combustion to generate heat or electricity, flaring): _____

i. Will the proposed action result in the release of air pollutants from open-air operations or processes, such as quarry or landfill operations? ☐Yes ☑No

If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust):

_____

j. Will the proposed action result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services? ☐Yes ☑No

If Yes:

i. When is the peak traffic expected (Check all that apply): ☐ Morning ☐ Evening ☐Weekend ☐ Randomly between hours of _____ to _____.

ii. For commercial activities only, projected number of truck trips/day and type (e.g., semi trailers and dump trucks): _____

iii. Parking spaces: Existing _____ Proposed _____ Net increase/decrease _____

iv. Does the proposed action include any shared use parking? ☐Yes ☐No

v. If the proposed action includes any modification of existing roads, creation of new roads or change in existing access, describe:

vi. Are public/private transportation service(s) or facilities available within ½ mile of the proposed site? ☐Yes ☐No

vii Will the proposed action include access to public transportation or accommodations for use of hybrid, electric or other alternative fueled vehicles? ☐Yes ☐No

viii. Will the proposed action include plans for pedestrian or bicycle accommodations for connections to existing pedestrian or bicycle routes? ☐Yes ☐No

k. Will the proposed action (for commercial or industrial projects only) generate new or additional demand for energy? ☐Yes ☑No

If Yes:

i. Estimate annual electricity demand during operation of the proposed action: _____

ii. Anticipated sources/suppliers of electricity for the project (e.g., on-site combustion, on-site renewable, via grid/local utility, or other):

iii. Will the proposed action require a new, or an upgrade, to an existing substation? ☐Yes ☐No

l. Hours of operation. Answer all items which apply.

i. During Construction:

- Monday - Friday: 8am - 5pm
- Saturday: _____
- Sunday: _____
- Holidays: _____

ii. During Operations:

- Monday - Friday: Not applicable
- Saturday: _____
- Sunday: _____
- Holidays: _____

m. Will the proposed action produce noise that will exceed existing ambient noise levels during construction, operation, or both? ☑ Yes ☐ No

If yes:

i. Provide details including sources, time of day and duration:

Minimal construction related noise may occur during lead abatement activities. Noise generated is assumed to be negligible and will be temporary in nature.

ii. Will the proposed action remove existing natural barriers that could act as a noise barrier or screen? ☐ Yes ☑ No

Describe: _____

n. Will the proposed action have outdoor lighting? ☐ Yes ☑ No

If yes:

i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures:

_____

ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen? ☐ Yes ☐ No

Describe: _____

o. Does the proposed action have the potential to produce odors for more than one hour per day? ☐ Yes ☑ No

If Yes, describe possible sources, potential frequency and duration of odor emissions, and proximity to nearest occupied structures: _____

p. Will the proposed action include any bulk storage of petroleum (combined capacity of over 1,100 gallons) or chemical products 185 gallons in above ground storage or any amount in underground storage? ☐ Yes ☑ No

If Yes:

i. Product(s) to be stored _____

ii. Volume(s) _____ per unit time _____ (e.g., month, year)

iii. Generally, describe the proposed storage facilities: _____

q. Will the proposed action (commercial, industrial and recreational projects only) use pesticides (i.e., herbicides, insecticides) during construction or operation? ☐ Yes ☑ No

If Yes:

i. Describe proposed treatment(s):

_____

ii. Will the proposed action use Integrated Pest Management Practices? ☐ Yes ☐ No

r. Will the proposed action (commercial or industrial projects only) involve or require the management or disposal of solid waste (excluding hazardous materials)? ☑ Yes ☐ No

If Yes:

i. Describe any solid waste(s) to be generated during construction or operation of the facility:

- Construction: TBD tons per _____ (unit of time)
- Operation : Not applicable tons per _____ (unit of time)

ii. Describe any proposals for on-site minimization, recycling or reuse of materials to avoid disposal as solid waste:

- Construction: Minimal waste will be generated during necessary lead abatement activities. This may include minor amounts of construction and demolition debris (i.e., windows).
- Operation: Not applicable

iii. Proposed disposal methods/facilities for solid waste generated on-site:

- Construction: Disposal will be completed in accordance with local regulations.
- Operation: Not applicable

s. Does the proposed action include construction or modification of a solid waste management facility? ☐ Yes ☑ No

If Yes:

i. Type of management or handling of waste proposed for the site (e.g., recycling or transfer station, composting, landfill, or other disposal activities): _____

ii. Anticipated rate of disposal/processing:

- _____ Tons/month, if transfer or other non-combustion/thermal treatment, or
- _____ Tons/hour, if combustion or thermal treatment

iii. If landfill, anticipated site life: _____ years

t. Will the proposed action at the site involve the commercial generation, treatment, storage, or disposal of hazardous waste? ☑ Yes ☐ No

If Yes:

i. Name(s) of all hazardous wastes or constituents to be generated, handled or managed at facility: _____

Lead based paint waste will be removed during remediation activities. This material will be disposed of consistent with local, state, and federal regulations. Not all lead based paint will qualify as a hazardous material, materials collected during abatement will be properly classified for disposal.

ii. Generally describe processes or activities involving hazardous wastes or constituents: _____

Lead remediation activities will result in clean up and removal of lead paint chips, lead based paint dust, and soil contaminated with lead.

iii. Specify amount to be handled or generated TBD tons/month

iv. Describe any proposals for on-site minimization, recycling or reuse of hazardous constituents: _____

Not applicable

v. Will any hazardous wastes be disposed at an existing offsite hazardous waste facility? ☑ Yes ☐ No

If Yes: provide name and location of facility: _____

The disposal of materials collected during remediation activities will be appropriately categorized and disposed of consistent with applicable regulations.

If No: describe proposed management of any hazardous wastes which will not be sent to a hazardous waste facility:

_____

E. Site and Setting of Proposed Action

E.1. Land uses on and surrounding the project site

a. Existing land uses.

i. Check all uses that occur on, adjoining and near the project site.

☑ Urban ☑ Industrial ☑ Commercial ☑ Residential (suburban) ☐ Rural (non-farm)

☑ Forest ☐ Agriculture ☑ Aquatic ☐ Other (specify): _____

ii. If mix of uses, generally describe:

The project site involves pre-1978 residential/nonresidential properties within the City of Syracuse. These structures are adjacent to a variety of land uses.

b. Land uses and covertypes on the project site.

Land use or Covertype	Current Acreage	Acreage After Project Completion	Change (Acres +/-)
• Roads, buildings, and other paved or impervious surfaces	Varies by individual property	Same	No Change
• Forested			
• Meadows, grasslands or brushlands (non-agricultural, including abandoned agricultural)			
• Agricultural (includes active orchards, field, greenhouse etc.)			
• Surface water features (lakes, ponds, streams, rivers, etc.)			
• Wetlands (freshwater or tidal)			
• Non-vegetated (bare rock, earth or fill)			
• Other Describe: _____			

c. Is the project site presently used by members of the community for public recreation? ☐ Yes ☑ No

i. If Yes: explain: _____

d. Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? ☑ Yes ☐ No

If Yes,

i. Identify Facilities:

Numerous schools, hospitals, day care centers, and group homes occur within the City of Syracuse and therefore will likely be located near pre-1978 properties subject to the proposed lead ordinance.

e. Does the project site contain an existing dam? ☐ Yes ☑ No

If Yes:

i. Dimensions of the dam and impoundment:

- Dam height: _____ feet
- Dam length: _____ feet
- Surface area: _____ acres
- Volume impounded: _____ gallons OR acre-feet

ii. Dam's existing hazard classification: _____

iii. Provide date and summarize results of last inspection:

_____

f. Has the project site ever been used as a municipal, commercial or industrial solid waste management facility, or does the project site adjoin property which is now, or was at one time, used as a solid waste management facility? ☐ Yes ☑ No

If Yes:

i. Has the facility been formally closed? ☐ Yes ☐ No

- If yes, cite sources/documentation: _____

ii. Describe the location of the project site relative to the boundaries of the solid waste management facility:

_____

iii. Describe any development constraints due to the prior solid waste activities: _____

g. Have hazardous wastes been generated, treated and/or disposed of at the site, or does the project site adjoin property which is now or was at one time used to commercially treat, store and/or dispose of hazardous waste? ☑ Yes ☐ No

If Yes:

i. Describe waste(s) handled and waste management activities, including approximate time when activities occurred:

The project site includes pre-1978 properties that may adjoin parcels historically used to treat, store, or dispose of hazardous waste. The City contains numerous NYSDEC Inactive Hazardous Waste, Brownfield, RCRA, VCP, and State Superfund Sites.

h. Potential contamination history. Has there been a reported spill at the proposed project site, or have any remedial actions been conducted at or adjacent to the proposed site? ☑ Yes ☐ No

If Yes:

i. Is any portion of the site listed on the NYSDEC Spills Incidents database or Environmental Site Remediation database? Check all that apply: ☑ Yes ☐ No

☑ Yes – Spills Incidents database — Provide DEC ID number(s): Numerous

☑ Yes – Environmental Site Remediation database — Provide DEC ID number(s): Numerous

☐ Neither database

ii. If site has been subject of RCRA corrective activities, describe control measures: _____

The project site includes pre-1978 properties that may adjoin parcels adjacent to RCRA Sites.

iii. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? ☑ Yes ☐ No

If yes, provide DEC ID number(s): The project site includes pre-1978 properties that may adjoin NYSDEC ENV Remediation Sites.

iv. If yes to (i), (ii) or (iii) above, describe current status of site(s):

Varies

v. Is the project site subject to an institutional control limiting property uses? ☐ Yes ☑ No

- If yes, DEC site ID number: _____
- Describe the type of institutional control (e.g., deed restriction or easement): _____
- Describe any use limitations: _____
- Describe any engineering controls: _____
- Will the project affect the institutional or engineering controls in place? ☐ Yes ☐ No
- Explain: _____

E.2. Natural Resources On or Near Project Site

a. What is the average depth to bedrock on the project site? Varies feet

b. Are there bedrock outcroppings on the project site? ☐ Yes ☑ No
If Yes, what proportion of the site is comprised of bedrock outcroppings? _____%

c. Predominant soil type(s) present on project site: Varies _____ %
_____ %
_____ %

d. What is the average depth to the water table on the project site? Average: Varies feet

e. Drainage status of project site soils:
☐ Well Drained: _____% of site
☐ Moderately Well Drained: _____% of site
☐ Poorly Drained _____% of site
Varies

f. Approximate proportion of proposed action site with slopes:
☐ 0-10%: _____% of site
☐ 10-15%: _____% of site
☐ 15% or greater: _____% of site
Varies

g. Are there any unique geologic features on the project site? ☐ Yes ☑ No
If Yes, describe: _____

h. Surface water features.

i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)? ☐ Yes ☑ No

ii. Do any wetlands or other waterbodies adjoin the project site? ☑ Yes ☐ No

If Yes to either *i* or *ii*, continue. If No, skip to E.2.i.

iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency? ☑ Yes ☐ No

iv. For each identified regulated wetland and waterbody on the project site, provide the following information:

- Streams: Name Multiple Classification B, C, C(T)
- Lakes or Ponds: Name Multiple Classification C
- Wetlands: Name Multiple Approximate Size Varies
- Wetland No. (if regulated by DEC) _____

v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies? ☑ Yes ☐ No

If yes, name of impaired water body/bodies and basis for listing as impaired: _____
Onondaga Lake (southern end), Onondaga Creek (upper and minor tributaries), Harbor Brook (lower and tributaries), Ley Creek (and tributaries)

i. Is the project site in a designated Floodway? ☑ Yes ☐ No

j. Is the project site in the 100-year Floodplain? ☑ Yes ☐ No

k. Is the project site in the 500-year Floodplain? ☑ Yes ☐ No

l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer? ☑ Yes ☐ No
If Yes:

i. Name of aquifer: Primary, Principal

m. Identify the predominant wildlife species that occupy or use the project site:

Raccoon	Grey squirell	Eastern chipmunk
Striped skunk	Eastern cottontail	White-footed mouse
Meadow vole	Norway rat	White tail deer

n. Does the project site contain a designated significant natural community? ☐ Yes ☑ No

If Yes:

i. Describe the habitat/community (composition, function, and basis for designation): _____

ii. Source(s) of description or evaluation: _____

iii. Extent of community/habitat:

- Currently: _____ acres
- Following completion of project as proposed: _____ acres
- Gain or loss (indicate + or -): _____ acres

o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species? ☑ Yes ☐ No

If Yes:

i. Species and listing (endangered or threatened): _____

Midland sedge, reflexed sedge, glomerate sedge, peregrine falcon, straight leaved pondweed, lake sturgeon, bald eagle, Indiana bat, northern long-eared bat

p. Does the project site contain any species of plant or animal that is listed by NYS as rare, or as a species of special concern? ☐ Yes ☑ No

If Yes:

i. Species and listing: _____

q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing? ☐ Yes ☑ No

If yes, give a brief description of how the proposed action may affect that use: _____

E.3. Designated Public Resources On or Near Project Site

a. Is the project site, or any portion of it, located in a designated agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? ☐ Yes ☑ No

If Yes, provide county plus district name/number: _____

b. Are agricultural lands consisting of highly productive soils present? ☐ Yes ☑ No

i. If Yes: acreage(s) on project site? _____

ii. Source(s) of soil rating(s): _____

c. Does the project site contain all or part of, or is it substantially contiguous to, a registered National Natural Landmark? ☐ Yes ☑ No

If Yes:

i. Nature of the natural landmark: ☐ Biological Community ☐ Geological Feature

ii. Provide brief description of landmark, including values behind designation and approximate size/extent: _____

d. Is the project site located in or does it adjoin a state listed Critical Environmental Area? ☐ Yes ☑ No

If Yes:

i. CEA name: _____

ii. Basis for designation: _____

iii. Designating agency and date: _____

e. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places? ☑ Yes ☐ No

If Yes:

i. Nature of historic/archaeological resource: ☑ Archaeological Site ☑ Historic Building or District

ii. Name: Multiple

iii. Brief description of attributes on which listing is based: _____

f. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory? ☑ Yes ☐ No

g. Have additional archaeological or historic site(s) or resources been identified on the project site? ☐ Yes ☑ No

If Yes:

i. Describe possible resource(s): _____

ii. Basis for identification: _____

h. Is the project site within fives miles of any officially designated and publicly accessible federal, state, or local scenic or aesthetic resource? ☐ Yes ☑ No

If Yes:

i. Identify resource: _____

ii. Nature of, or basis for, designation (e.g., established highway overlook, state or local park, state historic trail or scenic byway, etc.): _____

iii. Distance between project and resource: _____ miles.

i. Is the project site located within a designated river corridor under the Wild, Scenic and Recreational Rivers Program 6 NYCRR 666? ☐ Yes ☑ No

If Yes:

i. Identify the name of the river and its designation: _____

ii. Is the activity consistent with development restrictions contained in 6NYCRR Part 666? ☐ Yes ☐ No

F. Additional Information

Attach any additional information which may be needed to clarify your project.

If you have identified any adverse impacts which could be associated with your proposal, please describe those impacts plus any measures which you propose to avoid or minimize them.

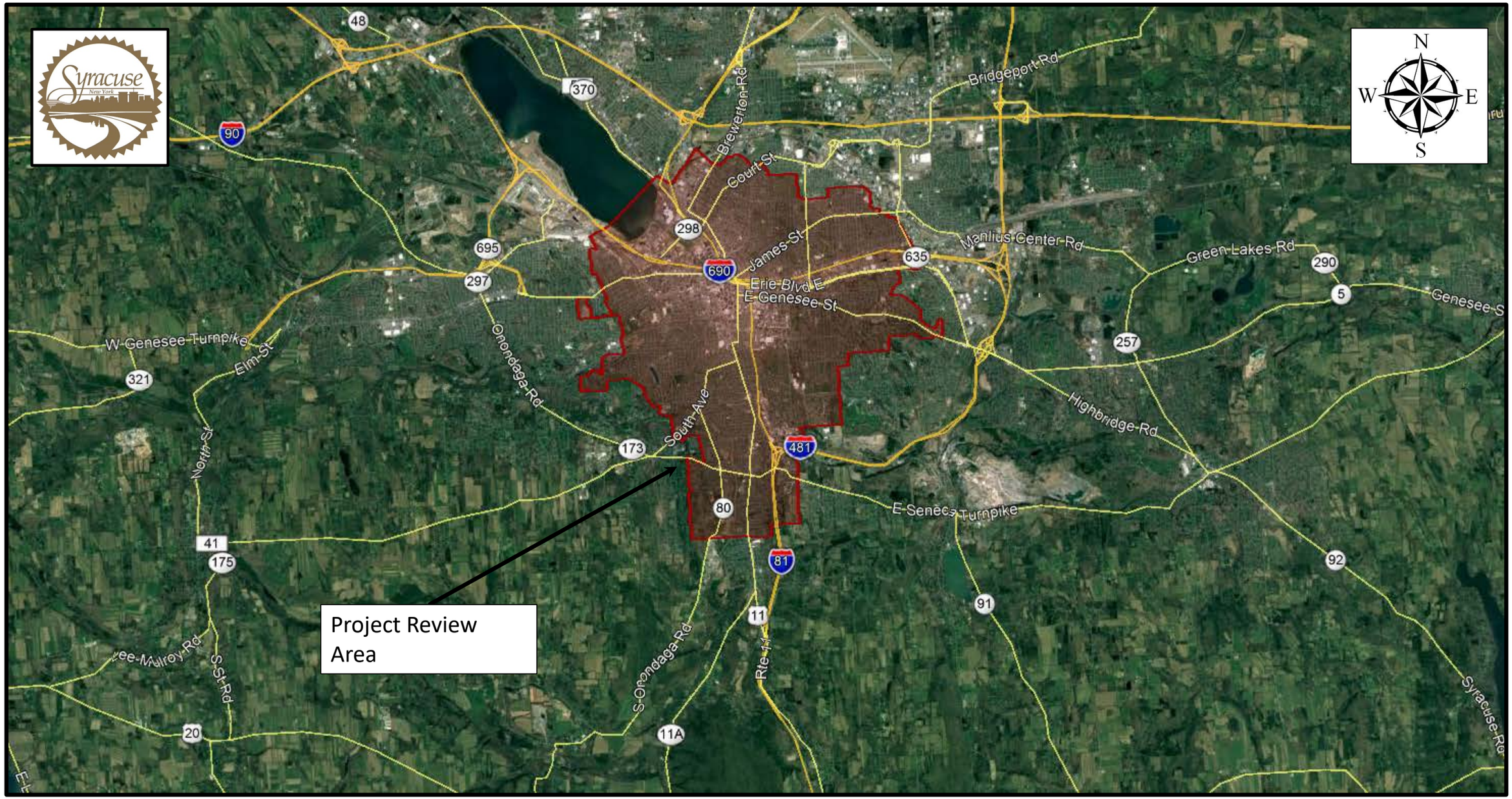
G. Verification

I certify that the information provided is true to the best of my knowledge.

Applicant/Sponsor Name _____ Date_____

Signature_____ Title_____

PRINT FORM



Source: Google Earth

Not to Scale

City of Syracuse
Proposed Lead Ordinance
State Environmental Quality Review
Lead Agency Designation

C&S COMPANIES®

Figure 1 –
Project Location Map

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Fish and Wildlife, New York Natural Heritage Program
625 Broadway, Fifth Floor, Albany, NY 12233-4757
P: (518) 402-8935 | F: (518) 402-8925
www.dec.ny.gov

July 2, 2019

Bryan A. Bayer
C&S Engineers, Inc.
99 Col. Eileen Collins Boulevard
Syracuse, NY 13212

Dear Mr. Bayer:

We have received your request of May 31, 2019, regarding the City of Syracuse's proposed lead ordinance to identify and address lead-based paint on the interiors and exteriors of structures in the City.

Given that the proposed activities are the identification and removal of lead in existing buildings; and that the New York Natural Heritage database has no records of state or federal endangered, threatened, or rare species which are regularly found in or on such existing buildings in this area; we therefore do not identify any potential impacts to endangered, threatened, and/or rare species or their habitats by the implementation of this ordinance.

Sincerely,

Nicholas B. Conrad
Information Resources Coordinator
NY Natural Heritage Program

637

NEW YORK STATE OF OPPORTUNITY. | Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

July 11, 2019

Bryan A. Bayer
Managing Environmental Scientist
C & S Engineering, Inc.
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
(via email)

Re: SEQRA
Proposed Lead Ordinance
City of Syracuse, Onondaga County
19PR03814

Dear Mr. Bayer:

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation's Division for Historic Preservation (OPRHP) as part of the city's SEQRA process. These comments are those of the Field Services Bureau and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

Based upon this review, it is the OPRHP's opinion that the passage of a city-wide lead ordinance may impact historic resources. As such, we recommend that the city's Landmark Preservation Board be consulted on opportunities where the important health goals of this legislation can be coordinated with the city's historic preservation goals. Establishing clear lead treatment options and standards for historic properties would be beneficial. Agencies such as the U.S. Department of Housing and Urban Development, Department of the Interior and the Environmental Protection Agency offer guidance on this subject.

If I can be of any further assistance, I can be reached at john.bonafide@parks.ny.gov or (518) 268-2166.

Sincerely,

John A. Bonafide
Director,
Technical Preservation Services Bureau
Agency Historic Preservation Officer

Enc: HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Chapter 18 – Lead Based Paint and Historic Preservation https://www.hud.gov/sites/documents/lbph-20.pdf

It is the City's intent to issue a positive declaration under SEQR and prepare a Generic Environmental Impact Statement (GEIS) to evaluate the project's potential to impact the environment. Your agency will be kept informed throughout the SEQR process. If you have any questions or comments on the proposed action, please do not hesitate to contact me at (315) 455-2000.

Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

This agency concurs with the designation of the City of Syracuse as lead agency.

New York State Department of Health 6-10-19

Involved/Interested Agency **Date**

Authorized Signature

C&S Companies
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

May 31, 2019

Dr. Indu Gupta, MD, MPH
Commissioner of Health
John H. Mulroy Civic Center
421 Montgomery Street
Syracuse, New York 13202

Re: City of Syracuse Proposed Lead Ordinance
SEQR Lead Agency Status

Dear Dr. Gupta,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. This letter serves as notification to all involved and interested agencies that the City is seeking lead agency status under SEQR for the proposed project.

In accordance with SEQR regulations, involved and interested agencies have 30 days to comment on the proposed City lead agency designation. We are treating this project as a Type I Action under SEQR. If your agency opposes the City's proposed status as lead agency, you have until June 8, 2019 to respond to the City's authorized consultant, C&S Engineers, Inc., in writing stating your opposition.

In an effort to maintain the project schedule, the City of Syracuse requests that if you concur with the proposed status, you sign the bottom of this letter and return it to C&S Engineers, Inc. on or before July 1, 2019.

C&S Engineers, Inc.
Attn: Bryan A. Bayer
499 Col Eileen Collins Blvd
Syracuse, New York 13212
Email: bbayer@cscos.com
Fax: 315-455-9667

RECEIVED
JUN - 3 2019

It is the City's intent to issue a positive declaration under SEQR and prepare a Generic Environmental Impact Statement (GEIS) to evaluate the project's potential to impact the environment. Your agency will be kept informed throughout the SEQR process. If you have any questions or comments on the proposed action, please do not hesitate to contact me at (315) 455-2000.

Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

This agency concurs with the designation of the City of Syracuse as lead agency.

ONONDAGA COUNTY HEALTH DEPT
Involved/Interested Agency

6/5/19
Date

Deputy Commissioner of Health
Authorized Signature

C&S Companies
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

August 27, 2019

Ms. Vickie Pane
U.S. EPA Region 2
MS-225
2890 Woodbridge Ave.
Edison, New Jersey 08837-3679

Re: City of Syracuse Proposed Lead Ordinance
SEQR Positive Declaration

Dear Ms. Pane,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. In accordance with the State Environmental Quality Review Act (SEQRA), C&S Engineers, Inc. (C&S), on behalf of the City, is notifying Involved and Interested Agencies of its status as Lead Agency for the above reference action. In its role as the Lead Agency, the City has issued a Positive Declaration (attached), and will be preparing a Draft Generic Environmental Impact Statement (DEIS) in accordance with the requirements of 6 NYCRR Part 617.

As an Involved/Interested Agency, you will receive additional updates about the SEQRA process as such information becomes available. If you have any questions or comments on the proposed action, please do not hesitate to contact me at (315) 455-2000 or by email at bbayer@cscos.com.

Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

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499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
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f: (315) 455-9667
www.cscos.com

August 27, 2019

Mr. David Bimber
Regional Permit Administrator
NYSDEC Region 7
615 Erie Blvd. West, Room 206
Syracuse, New York 13204-2400

Re: City of Syracuse Proposed Lead Ordinance
SEQR Positive Declaration

Dear Mr. Bimber,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. In accordance with the State Environmental Quality Review Act (SEQRA), C&S Engineers, Inc. (C&S), on behalf of the City, is notifying Involved and Interested Agencies of its status as Lead Agency for the above reference action. In its role as the Lead Agency, the City has issued a Positive Declaration (attached), and will be preparing a Draft Generic Environmental Impact Statement (DEIS) in accordance with the requirements of 6 NYCRR Part 617.

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Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

C&S Companies
499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

August 27, 2019

Dr. Howard Zucker, M.D., J.D.
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, New York 12237

Re: City of Syracuse Proposed Lead Ordinance
SEQR Positive Declaration

Dear Dr. Zucker,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. In accordance with the State Environmental Quality Review Act (SEQRA), C&S Engineers, Inc. (C&S), on behalf of the City, is notifying Involved and Interested Agencies of its status as Lead Agency for the above reference action. In its role as the Lead Agency, the City has issued a Positive Declaration (attached), and will be preparing a Draft Generic Environmental Impact Statement (DEIS) in accordance with the requirements of 6 NYCRR Part 617.

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Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

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499 Col. Eileen Collins Blvd.
Syracuse, NY 13212
p: (315) 455-2000
f: (315) 455-9667
www.cscos.com

August 27, 2019

Mr. Travis Glazier
Onondaga County Office of the Environment
John H. Mulroy Civic Center
421 Montgomery Street, 14th Floor
Syracuse, New York 13202

Re: City of Syracuse Proposed Lead Ordinance
SEQR Positive Declaration

Dear Mr. Glazier,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. In accordance with the State Environmental Quality Review Act (SEQRA), C&S Engineers, Inc. (C&S), on behalf of the City, is notifying Involved and Interested Agencies of its status as Lead Agency for the above reference action. In its role as the Lead Agency, the City has issued a Positive Declaration (attached), and will be preparing a Draft Generic Environmental Impact Statement (DEIS) in accordance with the requirements of 6 NYCRR Part 617.

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Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

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August 27, 2019

Dr. Indu Gupta, MD, MPH
Commissioner of Health
John H. Mulroy Civic Center
421 Montgomery Street
Syracuse, New York 13202

Re: City of Syracuse Proposed Lead Ordinance
SEQR Positive Declaration

Dear Dr. Gupta,

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Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

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August 27, 2019

Ms. Ruth Pierpont
Deputy Commissioner for Historic Preservation/Deputy SHPO
New York State Division for Historic Preservation
Peebles Island State Park
P.O. Box 189
Waterford, New York 12188-0189

Re: City of Syracuse Proposed Lead Ordinance
SEQR Positive Declaration

Dear Ms. Pierpont,

The City of Syracuse (City) is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed. In accordance with the State Environmental Quality Review Act (SEQRA), C&S Engineers, Inc. (C&S), on behalf of the City, is notifying Involved and Interested Agencies of its status as Lead Agency for the above reference action. In its role as the Lead Agency, the City has issued a Positive Declaration (attached), and will be preparing a Draft Generic Environmental Impact Statement (DEIS) in accordance with the requirements of 6 NYCRR Part 617.

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Very truly yours,

C&S ENGINEERS, INC.

Bryan A. Bayer, PWS, CE
Managing Environmental Scientist

/bab

cc: Stephanie Pasquale (City of Syracuse, Neighborhood and Business Development)

Ord. No. 47-2019

City of Syracuse

CITY CLERK'S OFFICE

I, JOHN P. COPANAS, City Clerk of the City of Syracuse, New York do hereby certify that the attached is a true copy of an ORDINANCE:

Adopted by the Common Council on July 29, 2019

Signed by the Mayor on August 1, 2019

City Clerk

TO:

Mayor
Assessment Commissioner
Aviation Commissioner
Board of Elections
Bureau of Accounts
Citizen Review Board
City Auditor
City School District
Code Enforcement
Neighborhood and Business Development
Finance Commissioner
Corporation Counsel
United States Congressperson
Governor of New York State
New York State Senate
New York State Assembly
New York State Senator
Onondaga County Legislature

Management & Budget Director
Parks & Recreation Commissioner
Personnel & Labor Relations Dir.
Police Chief
Public Works Commissioner
Public Works/Bookkeeper
Purchase Department
Real Estate Division
Research Director
Water Department
Zoning Administration
United States Senator
Department of Engineering
Finance/Treasury
Finance (Water Bureau)
Fire Chief
Grants Management Director
Board of Education

55

Ordinance No. 479 2019

ORDINANCE DETERMINING THAT AN ACTION TO ADOPT A PROPOSED LEAD HAZARD IDENTIFICATION AND REMEDIATION ORDINANCE IS A TYPE I ACTION AND MAY HAVE A SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACT WHICH THEREFORE REQUIRES A POSITIVE DECLARATION UNDER SEQRA

WHEREAS, adoption of a Lead Hazard Identification and Remediation Ordinance (the 'Project") is an Action by the Common Council, subject to the approval of the Mayor; and

WHEREAS, the Common Council on May 20, 2019, by Ordinance No. 230-2019, designated the City of Syracuse to act as Lead Agency relative to the proposed Project; and

WHEREAS, pursuant to Article 8 of the Environmental Conservation Law, as amended, the New York State Environmental Quality Review Act (the "SEQR Act") and the regulations adopted pursuant thereto by the Department of Environmental Conservation of the State of New York, being 6 NYCRR Part 617, as amended (the "Regulations"), the City of Syracuse (the "City") intends to comply with the SEQR Act and the Regulations with respect to the Project; and

WHEREAS, in furtherance of this objective, the Department of Neighborhood and Business Development (the "Department"), acting on behalf of the City as Lead Agency, prepared a Full Environmental Assessment Form ("FEAF") for the Project (a copy of the FEAF is attached hereto as Exhibit "A"); and

WHEREAS, pursuant to the Regulations, the Department, acting on behalf of the City, has considered the significance of the potential environmental impacts of the Project by (a) using the criteria specified in Section 617.7 of the Regulations, and (b) examining the FEAF for the

Project, together with other available supporting information, to identify the relevant areas of environmental concern, and (c) thoroughly analyzing the identified areas of relevant environmental concern; NOW, THEREFORE,

BE IT ORDAINED, that, subject to the approval of the Mayor, this Common Council authorizes the following findings and determinations:

Based upon an examination of the FEAF and other available supporting information, and considering both the magnitude and importance of each relevant area of environmental concern, and based further upon the Common Council's knowledge of the area surrounding the Project and such further investigation of the Project and its potential environmental impact as the Common Council has deemed appropriate, the Common Council makes the following findings and determinations:

1. The Project is described as set forth in Exhibit "A"; and

2. The Project constitutes a "Type I Action" (as the quoted term is defined in the Regulations); and

3. A potential environmental impact is noted in the FEAF for the Project. Therefore, the City, as Lead Agency, hereby determines that the Project may have a significant adverse environmental impact, and therefore the City will require the preparation of a Generic Environmental Impact Statement ("GEIS") with respect to the Project and the issuance of a positive declaration pursuant to SEQRA; and

BE IT FURTHER ORDAINED, that as a consequence of such determination and in compliance with the requirements of the SEQR Act and the Regulations, the Common Council directs the Commissioner of the Department of Neighborhood and Business Development to prepare a Positive Declaration and a GEIS; and

BE IT FURTHER ORDAINED, that the Positive Declaration and GEIS for the Project be filed in accordance with the Regulations; and

BE IT FURTHER ORDAINED, that the Commissioner of the Department of Neighborhood and Business Development is authorized to take whatever steps are necessary to carry out this Ordinance and to comply with applicable SEQRA regulations and requirements for this Project; and

BE IT FURTHER ORDAINED, that this Ordinance shall take effect immediately.

CITY OF SYRACUSE PROPOSED LEAD ORDINANCE
PART 3
ADDITIONAL INFORMATION

The City of Syracuse is proposing to amend its municipal property conservation code to provide the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures to be identified and correctly addressed. Recent studies indicate that 11.1% of children under the age of six in the City have an elevated blood level (EBLL) greater than or equal to 5 U/dl. In addition, 88% of all children with EBLL in Onondaga County reside in the City, where nearly all single, two, and three-family structures were built before 1980. The need for a lead ordinance is based on the significant impact that lead exposure has on residents, especially found in children. The City of Syracuse Proposed Lead Ordinance's main objective is to reduce the rate of lead poisoning in the City.

The lead ordinance will have beneficial results concerning human health of City residents; however, potential environmental impacts may arise as a result of this action. Lead exposure can influence health care costs, increase the need for special education, increase costs associated with legal implications, etc. Housing costs may also be effected as a result of lead-hazard control implementation. Human health implications are at the forefront of this proposed ordinance; the ordinance's main objective is to improve health within the City as it pertains to lead hazards. Implementation of the ordinance will also result in lead remediation construction activities; structures throughout the City are historic and therefore construction may result in adverse effects to significant resources. These impact categories, as well as those categories identified in Part 2 as potential impacts, are discussed further below.

Given the potential significance of the action as it relates to human health, community character, historic resources, etc., it is our opinion that an Environmental Impact Statement (EIS) should be prepared. A Generic EIS is a type of EIS that is typically used to consider broad-based actions or related groups of actions that agencies may approve, fund, or directly undertake. GEIS documents are more general or conceptual in nature. These documents provide an overall assessment of the project to have an effect to the environment, and develop standards and mitigating measures to follow for subsequent actions. As such, a GEIS is the recommended action. Included in the GEIS is an alternatives analysis, which is an effective tool used to identify the preferred option. The alternatives analysis will include a No-build scenario where the ordinance is not put forth; the benefits and limitations of reasonable alternatives will be compared to the no-build scenario.

1.) Impact on land – Remediation activities may result in the need for soil removal, and/or capping around the dripline of structures to remove/remediate lead contaminated soil. The need for soil disturbance will be based on site specific conditions. It is not anticipated that large quantities of earthwork will be necessary at each site.

10.) Impacts on historical and archeological resources – Many structures throughout the City are identified as historically significant, or have the potential to be eligible for listing in the State or National Register of Historic Places. Minor renovations to historic structures will likely occur as a result of the ordinance. The project is currently undergoing coordination with the State Historic Preservation Office (SHPO). The City will work with the SHPO to reduce significant adverse effects to historic structures as a result of the proposed ordinance.

PART 3
ADDITIONAL INFORMATION (Cont'd)

16.) Impact on Human Health – Human health implications are at the forefront of this proposed ordinance; the ordinance's main objective is to improve health within the City as it pertains to lead hazards. The finalization of the ordinance must consider the following:

1.) Protect renters from lead hazards, including during remediation activities
2.) Create safe work practices for lead-based paint disturbance
3.) Identify clearance examination standards for determining success or failure of controls and/or remediation work

Health implications need to be assessed further as this impact category is likely to create a significant adverse environmental effect in the event the ordinance is not effective.

17.) Consistency with community plans – The proposed ordinance involves amending the municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in /on pre-1978 structures. As such, the proposed action will impact pre-1978 structures and associated land uses adjacent to such properties. There are potential economic implications associated with introduction of necessary maintenance and repair requirements that could result in adverse consequences. Items for consideration include, but are not limited to, the following:

1.) Property types effected
2.) Tenant protections, including how occupants will be protected against retaliatory eviction, and additional protections, rights, and causes of action exist
3.) Disclosure and other requirements upon property transfer
4.) The potential for housing abandonment associated with cost of remediation activities

Additional economic items to consider with regard to the no-build scenario include:

1.) Loss of future income
2.) Increased health care costs
3.) Need for special education
4.) Increase burden on the criminal justice system
5.) Cost to New York State for lead poisoning efforts
6.) Increased need for/cost of litigation or legal counsel

The proposed action will not result in a change to the following:

I. Increase in population within the City
II. Require a change in zoning or existing land use plans
III. Change in the density of development that would exceed the capacity of existing infrastructure
IV. Result in induced socioeconomic impacts from residential or commercial development

Full Environmental Assessment Form
Part 1 - Project and Setting

Instructions for Completing Part 1

Part 1 is to be completed by the applicant or project sponsor. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification.

Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information; indicate whether missing information does not exist, or is not reasonably available to the sponsor; and, when possible, generally describe work or studies which would be necessary to update or fully develop that information.

Applicants/sponsors must complete all items in Sections A & B. In Sections C, D & E, most items contain an initial question that must be answered either "Yes" or "No". If the answer to the initial question is "Yes", complete the sub-questions that follow. If the answer to the initial question is "No", proceed to the next question. Section F allows the project sponsor to identify and attach any additional information. Section G requires the name and signature of the applicant or project sponsor to verify that the information contained in Part 1is accurate and complete.

A. Project and Applicant/Sponsor Information.

Name of Action or Project: City of Syracuse Proposed Lead Ordinance		
Project Location (describe, and attach a general location map): The action involves introduction of a citywide Ordinance through the City of Syracuse, Onondaga County, New York (See Figure 1).		
Brief Description of Proposed Action (include purpose or need): The City of Syracuse is proposing to amend its municipal property conservation code to provide for the identification, reduction and control of hazards due to the presence of deteriorated lead-based paint in/on pre-1978 structures. The primary goal is to protect residents from exposure and reduce the incidence of lead poisoning. The ordinance will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures be identified and correctly addressed.		
Name of Applicant/Sponsor: Hon. Ben Walsh, City of Syracuse	Telephone: (315) 448-8005 E-Mail: mayor@syrgov.net	
Address: 233 E. Washington Street, Suite 203		
City/PO: Syracuse	State: NY	Zip Code: 13202
Project Contact (if not same as sponsor; give name and title/role): Ms. Stephanie Pasquale, Dept. of Neighborhood and Bus. Development	Telephone: (315) 448-8109 E-Mail: spasquale@syrgov.net	
Address: 201 E. Washington Street, 6th Floor		
City/PO: Syracuse	State: NY	Zip Code: 13202
Property Owner (if not same as sponsor): Varies	Telephone: E-Mail:	
Address:		
City/PO:	State:	Zip Code:

B. Government Approvals

B. Government Approvals, Funding, or Sponsorship. ("Funding" includes grants, loans, tax relief, and any other forms of financial assistance.)		
Government Entity	**If Yes: Identify Agency and Approval(s) Required**	**Application Date (Actual or projected)**
a. City Counsel, Town Board, or Village Board of Trustees ☑Yes☐No	City of Syracuse Common Council Approval	To be determined
b. City, Town or Village Planning Board or Commission ☐Yes☑No		
c. City, Town or Village Zoning Board of Appeals ☐Yes☑No		
d. Other local agencies ☐Yes☑No		
e. County agencies ☐Yes☑No		
f. Regional agencies ☐Yes☑No		
g. State agencies ☐Yes☑No		
h. Federal agencies ☐Yes☑No		

i. Coastal Resources.

i. Is the project site within a Coastal Area, or the waterfront area of a Designated Inland Waterway? ☐Yes☑No

ii. Is the project site located in a community with an approved Local Waterfront Revitalization Program? ☑Yes☐No

iii. Is the project site within a Coastal Erosion Hazard Area? ☐Yes☑No

C. Planning and Zoning

C.1. Planning and zoning actions.

Will administrative or legislative adoption, or amendment of a plan, local law, ordinance, rule or regulation be the only approval(s) which must be granted to enable the proposed action to proceed? ☐Yes☑No

- **If Yes,** complete sections C, F and G.
- **If No,** proceed to question C.2 and complete all remaining sections and questions in Part 1

C.2. Adopted land use plans.

a. Do any municipally- adopted (city, town, village or county) comprehensive land use plan(s) include the site where the proposed action would be located? ☑Yes☐No

If Yes, does the comprehensive plan include specific recommendations for the site where the proposed action would be located? ☑Yes☐No

b. Is the site of the proposed action within any local or regional special planning district (for example: Greenway; Brownfield Opportunity Area (BOA); designated State or Federal heritage area; watershed management plan; or other?) ☑Yes☐No

If Yes, identify the plan(s):

The City of Syracuse provides multiple special planning districts including Brownfield Opportunity Areas and a Local Waterfront Revitalization Program. Portions of the Erie Canalway National Heritage Corridor occur within the City of Syracuse.

c. Is the proposed action located wholly or partially within an area listed in an adopted municipal open space plan, or an adopted municipal farmland protection plan? ☐Yes☑No

If Yes, identify the plan(s):

Open space areas occur throughout the City of Syracuse; however, the proposed lead ordinance will involve pre-1978 development and will not result in work in adopted open space areas. No farmland protection plans occur within the City limits.

C.3. Zoning

a. Is the site of the proposed action located in a municipality with an adopted zoning law or ordinance. ☑ Yes ☐ No
If Yes, what is the zoning classification(s) including any applicable overlay district?
Varies citywide

b. Is the use permitted or allowed by a special or conditional use permit? ☐ Yes ☑ No

c. Is a zoning change requested as part of the proposed action? ☐ Yes ☑ No
If Yes,
i. What is the proposed new zoning for the site? _____

C.4. Existing community services.

a. In what school district is the project site located? Syracuse City School District

b. What police or other public protection forces serve the project site?
City of Syracuse Police

c. Which fire protection and emergency medical services serve the project site?
City of Syracuse Fire Department, TLC Medical Transport, East Area Volunteer Emergency, Crouse Hosptial Emergency, Upstate Emergency Medicine

d. What parks serve the project site?
The City of Syracuse Parks Department operates 52 parks throughout the City.

D. Project Details

D.1. Proposed and Potential Development

a. What is the general nature of the proposed action (e.g., residential, industrial, commercial, recreational; if mixed, include all components)? Residential/nonresidential structures

b. a. Total acreage of the site of the proposed action? Varies acres
b. Total acreage to be physically disturbed? Varies acres
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? Varies acres

c. Is the proposed action an expansion of an existing project or use? ☐ Yes ☑ No
i. If Yes, what is the approximate percentage of the proposed expansion and identify the units (e.g., acres, miles, housing units, square feet)? % _____ Units: _____

d. Is the proposed action a subdivision, or does it include a subdivision? ☐ Yes ☑ No
If Yes,
i. Purpose or type of subdivision? (e.g., residential, industrial, commercial; if mixed, specify types)
ii. Is a cluster/conservation layout proposed? ☐ Yes ☐ No
iii. Number of lots proposed? _____
iv. Minimum and maximum proposed lot sizes? Minimum _____ Maximum _____

e. Will the proposed action be constructed in multiple phases? ☐ Yes ☑ No
i. If No, anticipated period of construction: _____ months
ii. If Yes:
- Total number of phases anticipated _____
- Anticipated commencement date of phase 1 (including demolition) _____ month _____ year
- Anticipated completion date of final phase _____ month _____ year
- Generally describe connections or relationships among phases, including any contingencies where progress of one phase may determine timing or duration of future phases: _____

f. Does the project include new residential uses? ☐Yes ☑No
If Yes, show numbers of units proposed.

	One Family	Two Family	Three Family	Multiple Family (four or more)
Initial Phase	_____	_____	_____	_____
At completion of all phases	_____	_____	_____	_____

g. Does the proposed action include new non-residential construction (including expansions)? ☐Yes ☑No
If Yes,
i. Total number of structures _____
ii. Dimensions (in feet) of largest proposed structure: _____height; _____width; and _____ length
iii. Approximate extent of building space to be heated or cooled: _____ square feet

h. Does the proposed action include construction or other activities that will result in the impoundment of any liquids, such as creation of a water supply, reservoir, pond, lake, waste lagoon or other storage? ☐Yes ☑No
If Yes,
i. Purpose of the impoundment: _____
ii. If a water impoundment, the principal source of the water: ☐ Ground water ☐ Surface water streams ☐Other specify:
_____
iii. If other than water, identify the type of impounded/contained liquids and their source.
_____
iv. Approximate size of the proposed impoundment. Volume: _____ million gallons; surface area: _____ acres
v. Dimensions of the proposed dam or impounding structure: _____ height; _____ length
vi. Construction method/materials for the proposed dam or impounding structure (e.g., earth fill, rock, wood, concrete):
_____

D.2. Project Operations

a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both? (Not including general site preparation, grading or installation of utilities or foundations where all excavated materials will remain onsite) ☐Yes ☑No
If Yes:
i. What is the purpose of the excavation or dredging? _____
ii. How much material (including rock, earth, sediments, etc.) is proposed to be removed from the site?
- Volume (specify tons or cubic yards): _____
- Over what duration of time? _____

iii. Describe nature and characteristics of materials to be excavated or dredged, and plans to use, manage or dispose of them.
_____
_____
iv. Will there be onsite dewatering or processing of excavated materials? ☐Yes ☐No
If yes, describe. _____
_____
v. What is the total area to be dredged or excavated? _____ acres
vi. What is the maximum area to be worked at any one time? _____ acres
vii. What would be the maximum depth of excavation or dredging? _____ feet
viii. Will the excavation require blasting? ☐Yes ☐No
ix. Summarize site reclamation goals and plan: _____
_____
_____

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment into any existing wetland, waterbody, shoreline, beach or adjacent area? ☐Yes ☑No
If Yes:
i. Identify the wetland or waterbody which would be affected (by name, water index number, wetland map number or geographic description): _____
_____

ii. Describe how the proposed action would affect that waterbody or wetland, e.g. excavation, fill, placement of structures, or alteration of channels, banks and shorelines. Indicate extent of activities, alterations and additions in square feet or acres:

_____

_____

_____

_____

iii. Will the proposed action cause or result in disturbance to bottom sediments? ☐Yes ☐No

If Yes, describe: _____

iv. Will the proposed action cause or result in the destruction or removal of aquatic vegetation? ☐Yes ☐No

If Yes:

- acres of aquatic vegetation proposed to be removed: _____
- expected acreage of aquatic vegetation remaining after project completion: _____
- purpose of proposed removal (e.g. beach clearing, invasive species control, boat access): _____
- proposed method of plant removal: _____
- if chemical/herbicide treatment will be used, specify product(s): _____

v. Describe any proposed reclamation/mitigation following disturbance: _____

c. Will the proposed action use, or create a new demand for water? ☐Yes ☑No

If Yes:

i. Total anticipated water usage/demand per day: _____ gallons/day

ii. Will the proposed action obtain water from an existing public water supply? ☐Yes ☐No

If Yes:

- Name of district or service area: _____
- Does the existing public water supply have capacity to serve the proposal? ☐Yes ☐No
- Is the project site in the existing district? ☐Yes ☐No
- Is expansion of the district needed? ☐Yes ☐No
- Do existing lines serve the project site? ☐Yes ☐No

iii. Will line extension within an existing district be necessary to supply the project? ☐Yes ☐No

If Yes:

- Describe extensions or capacity expansions proposed to serve this project: _____
- Source(s) of supply for the district: _____

iv. Is a new water supply district or service area proposed to be formed to serve the project site? ☐ Yes ☐No

If, Yes:

- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- Proposed source(s) of supply for new district: _____

v. If a public water supply will not be used, describe plans to provide water supply for the project: _____

vi. If water supply will be from wells (public or private), what is the maximum pumping capacity: _____ gallons/minute.

d. Will the proposed action generate liquid wastes? ☐Yes ☑No

If Yes:

i. Total anticipated liquid waste generation per day: _____ gallons/day

ii. Nature of liquid wastes to be generated (e.g., sanitary wastewater, industrial; if combination, describe all components and approximate volumes or proportions of each): _____

iii. Will the proposed action use any existing public wastewater treatment facilities? ☐Yes ☐No

If Yes:

- Name of wastewater treatment plant to be used: _____
- Name of district: _____
- Does the existing wastewater treatment plant have capacity to serve the project? ☐Yes ☐No
- Is the project site in the existing district? ☐Yes ☐No
- Is expansion of the district needed? ☐Yes ☐No

- Do existing sewer lines serve the project site? ☐Yes☐No
- Will a line extension within an existing district be necessary to serve the project? ☐Yes☐No

  If Yes:
  - Describe extensions or capacity expansions proposed to serve this project: _____

iv. Will a new wastewater (sewage) treatment district be formed to serve the project site? ☐Yes☐No

If Yes:
- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- What is the receiving water for the wastewater discharge? _____

v. If public facilities will not be used, describe plans to provide wastewater treatment for the project, including specifying proposed receiving water (name and classification if surface discharge or describe subsurface disposal plans):

_____

vi. Describe any plans or designs to capture, recycle or reuse liquid waste: _____

e. Will the proposed action disturb more than one acre and create stormwater runoff, either from new point sources (i.e. ditches, pipes, swales, curbs, gutters or other concentrated flows of stormwater) or non-point source (i.e. sheet flow) during construction or post construction? ☐Yes☑No

If Yes:

i. How much impervious surface will the project create in relation to total size of project parcel?

_____ Square feet or _____ acres (impervious surface)

_____ Square feet or _____ acres (parcel size)

ii. Describe types of new point sources. _____

iii. Where will the stormwater runoff be directed (i.e. on-site stormwater management facility/structures, adjacent properties, groundwater, on-site surface water or off-site surface waters)?

_____

- If to surface waters, identify receiving water bodies or wetlands: _____
- Will stormwater runoff flow to adjacent properties? ☐Yes☐No

iv. Does the proposed plan minimize impervious surfaces, use pervious materials or collect and re-use stormwater? ☐Yes☐No

f. Does the proposed action include, or will it use on-site, one or more sources of air emissions, including fuel combustion, waste incineration, or other processes or operations? ☑Yes☐No

If Yes, identify:

i. Mobile sources during project operations (e.g., heavy equipment, fleet or delivery vehicles)

City vehicles will be used during inspection activities.

ii. Stationary sources during construction (e.g., power generation, structural heating, batch plant, crushers)

None

iii. Stationary sources during operations (e.g., process emissions, large boilers, electric generation)

None

g. Will any air emission sources named in D.2.f (above), require a NY State Air Registration, Air Facility Permit, or Federal Clean Air Act Title IV or Title V Permit? ☐Yes☑No

If Yes:

i. Is the project site located in an Air quality non-attainment area? (Area routinely or periodically fails to meet ambient air quality standards for all or some parts of the year) ☐Yes☐No

ii. In addition to emissions as calculated in the application, the project will generate:
- _____Tons/year (short tons) of Carbon Dioxide (CO_2)
- _____Tons/year (short tons) of Nitrous Oxide (N_2O)
- _____Tons/year (short tons) of Perfluorocarbons (PFCs)
- _____Tons/year (short tons) of Sulfur Hexafluoride (SF_6)
- _____Tons/year (short tons) of Carbon Dioxide equivalent of Hydroflourocarbons (HFCs)
- _____Tons/year (short tons) of Hazardous Air Pollutants (HAPs)

h. Will the proposed action generate or emit methane (including, but not limited to, sewage treatment plants, landfills, composting facilities)? ☐Yes ☑No

If Yes:

i. Estimate methane generation in tons/year (metric): _____

ii. Describe any methane capture, control or elimination measures included in project design (e.g., combustion to generate heat or electricity, flaring): _____

i. Will the proposed action result in the release of air pollutants from open-air operations or processes, such as quarry or landfill operations? ☐Yes ☑No

If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust):

_____

j. Will the proposed action result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services? ☐Yes ☑No

If Yes:

i. When is the peak traffic expected (Check all that apply): ☐ Morning ☐ Evening ☐Weekend ☐ Randomly between hours of _____ to _____.

ii. For commercial activities only, projected number of truck trips/day and type (e.g., semi trailers and dump trucks): _____

iii. Parking spaces: Existing _____ Proposed _____ Net increase/decrease _____

iv. Does the proposed action include any shared use parking? ☐Yes ☐No

v. If the proposed action includes any modification of existing roads, creation of new roads or change in existing access, describe:

vi. Are public/private transportation service(s) or facilities available within ½ mile of the proposed site? ☐Yes ☐No

vii Will the proposed action include access to public transportation or accommodations for use of hybrid, electric or other alternative fueled vehicles? ☐Yes ☐No

viii. Will the proposed action include plans for pedestrian or bicycle accommodations for connections to existing pedestrian or bicycle routes? ☐Yes ☐No

k. Will the proposed action (for commercial or industrial projects only) generate new or additional demand for energy? ☐Yes ☑No

If Yes:

i. Estimate annual electricity demand during operation of the proposed action: _____

ii. Anticipated sources/suppliers of electricity for the project (e.g., on-site combustion, on-site renewable, via grid/local utility, or other):

iii. Will the proposed action require a new, or an upgrade, to an existing substation? ☐Yes ☐No

l. Hours of operation. Answer all items which apply.

i. During Construction:

- Monday - Friday: 8am - 5pm
- Saturday: _____
- Sunday: _____
- Holidays: _____

ii. During Operations:

- Monday - Friday: Not applicable
- Saturday: _____
- Sunday: _____
- Holidays: _____

m. Will the proposed action produce noise that will exceed existing ambient noise levels during construction, operation, or both? ☑ Yes ☐ No

If yes:

i. Provide details including sources, time of day and duration:

Minimal construction related noise may occur during lead abatement activities. Noise generated is assumed to be negligible and will be temporary in nature.

ii. Will the proposed action remove existing natural barriers that could act as a noise barrier or screen? ☐ Yes ☑ No

Describe: _____

n. Will the proposed action have outdoor lighting? ☐ Yes ☑ No

If yes:

i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures:

ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen? ☐ Yes ☐ No

Describe: _____

o. Does the proposed action have the potential to produce odors for more than one hour per day? ☐ Yes ☑ No

If Yes, describe possible sources, potential frequency and duration of odor emissions, and proximity to nearest occupied structures: _____

p. Will the proposed action include any bulk storage of petroleum (combined capacity of over 1,100 gallons) or chemical products 185 gallons in above ground storage or any amount in underground storage? ☐ Yes ☑ No

If Yes:

i. Product(s) to be stored _____

ii. Volume(s) _____ per unit time _____ (e.g., month, year)

iii. Generally, describe the proposed storage facilities: _____

q. Will the proposed action (commercial, industrial and recreational projects only) use pesticides (i.e., herbicides, insecticides) during construction or operation? ☐ Yes ☑ No

If Yes:

i. Describe proposed treatment(s):

ii. Will the proposed action use Integrated Pest Management Practices? ☐ Yes ☐ No

r. Will the proposed action (commercial or industrial projects only) involve or require the management or disposal of solid waste (excluding hazardous materials)? ☑ Yes ☐ No

If Yes:

i. Describe any solid waste(s) to be generated during construction or operation of the facility:

- Construction: TBD tons per _____ (unit of time)
- Operation : Not applicable tons per _____ (unit of time)

ii. Describe any proposals for on-site minimization, recycling or reuse of materials to avoid disposal as solid waste:

- Construction: Minimal waste will be generated during necessary lead abatement activities. This may include minor amounts of construction and demolition debris (i.e., windows).
- Operation: Not applicable

iii. Proposed disposal methods/facilities for solid waste generated on-site:

- Construction: Disposal will be completed in accordance with local regulations.
- Operation: Not applicable

s. Does the proposed action include construction or modification of a solid waste management facility? ☐ Yes ☑ No

If Yes:

i. Type of management or handling of waste proposed for the site (e.g., recycling or transfer station, composting, landfill, or other disposal activities): _____

ii. Anticipated rate of disposal/processing:

- _____ Tons/month, if transfer or other non-combustion/thermal treatment, or
- _____ Tons/hour, if combustion or thermal treatment

iii. If landfill, anticipated site life: _____ years

t. Will the proposed action at the site involve the commercial generation, treatment, storage, or disposal of hazardous waste? ☑ Yes ☐ No

If Yes:

i. Name(s) of all hazardous wastes or constituents to be generated, handled or managed at facility:
Lead based paint waste will be removed during remediation activities. This material will be disposed of consistent with local, state, and federal regulations. Not all lead based paint will qualify as a hazardous material, materials collected during abatement will be properly classified for disposal.

ii. Generally describe processes or activities involving hazardous wastes or constituents:
Lead remediation activities will result in clean up and removal of lead paint chips, lead based paint dust, and soil contaminated with lead.

iii. Specify amount to be handled or generated TBD tons/month

iv. Describe any proposals for on-site minimization, recycling or reuse of hazardous constituents:
Not applicable

v. Will any hazardous wastes be disposed at an existing offsite hazardous waste facility? ☑ Yes ☐ No

If Yes: provide name and location of facility:
The disposal of materials collected during remediation activities will be appropriately categorized and disposed of consistent with applicable regulations.

If No: describe proposed management of any hazardous wastes which will not be sent to a hazardous waste facility:

E. Site and Setting of Proposed Action

E.1. Land uses on and surrounding the project site

a. Existing land uses.

i. Check all uses that occur on, adjoining and near the project site.

☑ Urban ☑ Industrial ☑ Commercial ☑ Residential (suburban) ☐ Rural (non-farm)
☑ Forest ☐ Agriculture ☑ Aquatic ☐ Other (specify): _____

ii. If mix of uses, generally describe:
The project site involves pre-1978 residential/nonresidential properties within the City of Syracuse. These structures are adjacent to a variety of land uses.

b. Land uses and covertypes on the project site.

Land use or Covertype	Current Acreage	Acreage After Project Completion	Change (Acres +/-)
• Roads, buildings, and other paved or impervious surfaces	Varies by individual property	Same	No Change
• Forested			
• Meadows, grasslands or brushlands (non-agricultural, including abandoned agricultural)			
• Agricultural (includes active orchards, field, greenhouse etc.)			
• Surface water features (lakes, ponds, streams, rivers, etc.)			
• Wetlands (freshwater or tidal)			
• Non-vegetated (bare rock, earth or fill)			
• Other Describe: _____			

c. Is the project site presently used by members of the community for public recreation? ☐Yes ☑No

i. If Yes: explain: _____

d. Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? ☑Yes ☐No

If Yes,

i. Identify Facilities:

Numerous schools, hospitals, day care centers, and group homes occur within the City of Syracuse and therefore will likely be located near pre-1978 properties subject to the proposed lead ordinance.

e. Does the project site contain an existing dam? ☐Yes ☑No

If Yes:

i. Dimensions of the dam and impoundment:

- Dam height: _____ feet
- Dam length: _____ feet
- Surface area: _____ acres
- Volume impounded: _____ gallons OR acre-feet

ii. Dam's existing hazard classification: _____

iii. Provide date and summarize results of last inspection:

_____

f. Has the project site ever been used as a municipal, commercial or industrial solid waste management facility, or does the project site adjoin property which is now, or was at one time, used as a solid waste management facility? ☐Yes ☑No

If Yes:

i. Has the facility been formally closed? ☐Yes ☐ No

- If yes, cite sources/documentation: _____

ii. Describe the location of the project site relative to the boundaries of the solid waste management facility:

_____

iii. Describe any development constraints due to the prior solid waste activities: _____

g. Have hazardous wastes been generated, treated and/or disposed of at the site, or does the project site adjoin property which is now or was at one time used to commercially treat, store and/or dispose of hazardous waste? ☑Yes ☐No

If Yes:

i. Describe waste(s) handled and waste management activities, including approximate time when activities occurred:

The project site includes pre-1978 properties that may adjoin parcels historically used to treat, store, or dispose of hazardous waste. The City contains numerous NYSDEC Inactive Hazardous Waste, Brownfield, RCRA, VCP, and State Superfund Sites.

h. Potential contamination history. Has there been a reported spill at the proposed project site, or have any remedial actions been conducted at or adjacent to the proposed site? ☑Yes ☐ No

If Yes:

i. Is any portion of the site listed on the NYSDEC Spills Incidents database or Environmental Site Remediation database? Check all that apply: ☑Yes ☐No

☑ Yes – Spills Incidents database — Provide DEC ID number(s): Numerous

☑ Yes – Environmental Site Remediation database — Provide DEC ID number(s): Numerous

☐ Neither database

ii. If site has been subject of RCRA corrective activities, describe control measures: _____

The project site includes pre-1978 properties that may adjoin parcels adjacent to RCRA Sites.

iii. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? ☑Yes ☐No

If yes, provide DEC ID number(s): The project site includes pre-1978 properties that may adjoin NYSDEC ENV Remediation Sites.

iv. If yes to (i), (ii) or (iii) above, describe current status of site(s):

Varies

v. Is the project site subject to an institutional control limiting property uses? ☐Yes ☑No

- If yes, DEC site ID number: _____
- Describe the type of institutional control (e.g., deed restriction or easement): _____
- Describe any use limitations: _____
- Describe any engineering controls: _____
- Will the project affect the institutional or engineering controls in place? ☐Yes ☐No
- Explain: _____

E.2. Natural Resources On or Near Project Site

a. What is the average depth to bedrock on the project site? Varies feet

b. Are there bedrock outcroppings on the project site? ☐Yes ☑No
If Yes, what proportion of the site is comprised of bedrock outcroppings? _____%

c. Predominant soil type(s) present on project site: Varies _____%
_____%
_____%

d. What is the average depth to the water table on the project site? Average: Varies feet

e. Drainage status of project site soils: ☐ Well Drained: ____% of site
☐ Moderately Well Drained: ____% of site Varies
☐ Poorly Drained ____% of site

f. Approximate proportion of proposed action site with slopes: ☐ 0-10%: ____% of site
☐ 10-15%: ____% of site Varies
☐ 15% or greater: ____% of site

g. Are there any unique geologic features on the project site? ☐Yes ☑No
If Yes, describe: _____

h. Surface water features.

i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)? ☐Yes ☑No

ii. Do any wetlands or other waterbodies adjoin the project site? ☑Yes ☐No

If Yes to either *i* or *ii*, continue. If No, skip to E.2.i.

iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency? ☑Yes ☐No

iv. For each identified regulated wetland and waterbody on the project site, provide the following information:

- Streams: Name Multiple Classification B, C, C(T)
- Lakes or Ponds: Name Multiple Classification C
- Wetlands: Name Multiple Approximate Size Varies
- Wetland No. (if regulated by DEC) _____

v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies? ☑Yes ☐No

If yes, name of impaired water body/bodies and basis for listing as impaired:
Onondaga Lake (southern end), Onondaga Creek (upper and minor tributaries), Harbor Brook (lower and tributaries), Ley Creek (and tributaries)

i. Is the project site in a designated Floodway? ☑Yes ☐No

j. Is the project site in the 100-year Floodplain? ☑Yes ☐No

k. Is the project site in the 500-year Floodplain? ☑Yes ☐No

l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer? ☑Yes ☐No
If Yes:

i. Name of aquifer: Primary, Principal

m. Identify the predominant wildlife species that occupy or use the project site:

Raccoon	Grey squirell	Eastern chipmunk
Striped skunk	Eastern cottontail	White-footed mouse
Meadow vole	Norway rat	White tail deer

n. Does the project site contain a designated significant natural community? ☐Yes ☑No

If Yes:

i. Describe the habitat/community (composition, function, and basis for designation): _____

ii. Source(s) of description or evaluation: _____

iii. Extent of community/habitat:

- Currently: _____ acres
- Following completion of project as proposed: _____ acres
- Gain or loss (indicate + or -): _____ acres

o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species? ☑ Yes ☐No

If Yes:

i. Species and listing (endangered or threatened): _____

Midland sedge, reflexed sedge, glomerate sedge, peregrine falcon, straight leaved pondweed, lake sturgeon, bald eagle, Indiana bat, northern long-eared bat

p. Does the project site contain any species of plant or animal that is listed by NYS as rare, or as a species of special concern? ☐Yes ☑No

If Yes:

i. Species and listing: _____

q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing? ☐Yes ☑No

If yes, give a brief description of how the proposed action may affect that use: _____

E.3. Designated Public Resources On or Near Project Site

a. Is the project site, or any portion of it, located in a designated agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? ☐Yes ☑No

If Yes, provide county plus district name/number: _____

b. Are agricultural lands consisting of highly productive soils present? ☐Yes ☑No

i. If Yes: acreage(s) on project site? _____

ii. Source(s) of soil rating(s): _____

c. Does the project site contain all or part of, or is it substantially contiguous to, a registered National Natural Landmark? ☐Yes ☑No

If Yes:

i. Nature of the natural landmark: ☐ Biological Community ☐ Geological Feature

ii. Provide brief description of landmark, including values behind designation and approximate size/extent: _____

d. Is the project site located in or does it adjoin a state listed Critical Environmental Area? ☐Yes ☑No

If Yes:

i. CEA name: _____

ii. Basis for designation: _____

iii. Designating agency and date: _____

e. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places? ☑ Yes ☐ No

If Yes:

i. Nature of historic/archaeological resource: ☑ Archaeological Site ☑ Historic Building or District

ii. Name: Multiple

iii. Brief description of attributes on which listing is based: _____

f. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory? ☑ Yes ☐ No

g. Have additional archaeological or historic site(s) or resources been identified on the project site? ☐ Yes ☑ No

If Yes:

i. Describe possible resource(s): _____

ii. Basis for identification: _____

h. Is the project site within fives miles of any officially designated and publicly accessible federal, state, or local scenic or aesthetic resource? ☐ Yes ☑ No

If Yes:

i. Identify resource: _____

ii. Nature of, or basis for, designation (e.g., established highway overlook, state or local park, state historic trail or scenic byway, etc.): _____

iii. Distance between project and resource: _____ miles.

i. Is the project site located within a designated river corridor under the Wild, Scenic and Recreational Rivers Program 6 NYCRR 666? ☐ Yes ☑ No

If Yes:

i. Identify the name of the river and its designation: _____

ii. Is the activity consistent with development restrictions contained in 6NYCRR Part 666? ☐ Yes ☐ No

F. Additional Information

Attach any additional information which may be needed to clarify your project.

If you have identified any adverse impacts which could be associated with your proposal, please describe those impacts plus any measures which you propose to avoid or minimize them.

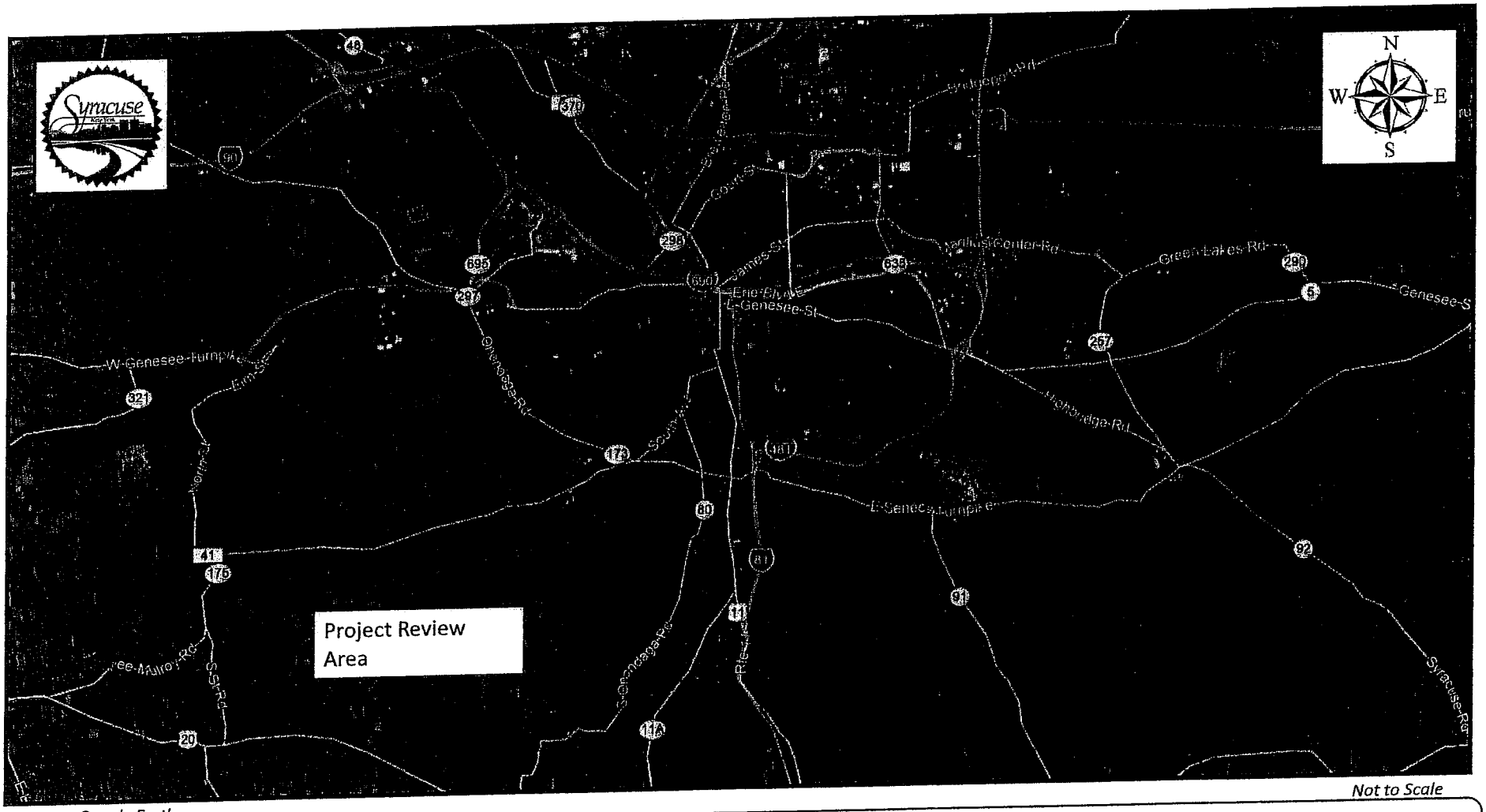
G. Verification

I certify that the information provided is true to the best of my knowledge.

Applicant/Sponsor Name _____ Date _____

Signature _____ Title _____

PRINT FORM



Source: Google Earth

City of Syracuse
Proposed Lead Ordinance
State Environmental Quality Review
Lead Agency Designation

C&S COMPANIES

Figure 1 – Project Location Map

Full Environmental Assessment Form
Part 2 - Identification of Potential Project Impacts

Part 2 is to be completed by the lead agency. Part 2 is designed to help the lead agency inventory all potential resources that could be affected by a proposed project or action. We recognize that the lead agency's reviewer(s) will not necessarily be environmental professionals. So, the questions are designed to walk a reviewer through the assessment process by providing a series of questions that can be answered using the information found in Part 1. To further assist the lead agency in completing Part 2, the form identifies the most relevant questions in Part 1 that will provide the information needed to answer the Part 2 question. When Part 2 is completed, the lead agency will have identified the relevant environmental areas that may be impacted by the proposed activity.

If the lead agency is a state agency **and** the action is in any Coastal Area, complete the Coastal Assessment Form before proceeding with this assessment.

Tips for completing Part 2:

- Review all of the information provided in Part 1.
- Review any application, maps, supporting materials and the Full EAF Workbook.
- Answer each of the 18 questions in Part 2.
- If you answer **"Yes"** to a numbered question, please complete all the questions that follow in that section.
- If you answer **"No"** to a numbered question, move on to the next numbered question.
- Check appropriate column to indicate the anticipated size of the impact.
- Proposed projects that would exceed a numeric threshold contained in a question should result in the reviewing agency checking the box "Moderate to large impact may occur."
- The reviewer is not expected to be an expert in environmental analysis.
- If you are not sure or undecided about the size of an impact, it may help to review the sub-questions for the general question and consult the workbook.
- When answering a question consider all components of the proposed activity, that is, the "whole action".
- Consider the possibility for long-term and cumulative impacts as well as direct impacts.
- Answer the question in a reasonable manner considering the scale and context of the project.

1. Impact on Land
Proposed action may involve construction on, or physical alteration of, the land surface of the proposed site. (See Part 1. D.1) ☐ NO ☑ YES
If "Yes", answer questions a - j. If "No", move on to Section 2.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may involve construction on land where depth to water table is less than 3 feet.	E2d	☑	☐
b. The proposed action may involve construction on slopes of 15% or greater.	E2f	☑	☐
c. The proposed action may involve construction on land where bedrock is exposed, or generally within 5 feet of existing ground surface.	E2a	☑	☐
d. The proposed action may involve the excavation and removal of more than 1,000 tons of natural material.	D2a	☑	☐
e. The proposed action may involve construction that continues for more than one year or in multiple phases.	D1e	☑	☐
f. The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal (including from treatment by herbicides).	D2e, D2q	☑	☐
g. The proposed action is, or may be, located within a Coastal Erosion hazard area.	B1i	☑	☐
h. Other impacts: _____		☑	☐

2. Impact on Geological Features

The proposed action may result in the modification or destruction of, or inhibit access to, any unique or unusual land forms on the site (e.g., cliffs, dunes, minerals, fossils, caves). (See Part 1. E.2.g) ☑ NO ☐ YES

If "Yes", answer questions a - c. If "No", move on to Section 3.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Identify the specific land form(s) attached: _____	E2g	☐	☐
b. The proposed action may affect or is adjacent to a geological feature listed as a registered National Natural Landmark. Specific feature: _____	E3c	☐	☐
c. Other impacts: _____		☐	☐

3. Impacts on Surface Water

The proposed action may affect one or more wetlands or other surface water bodies (e.g., streams, rivers, ponds or lakes). (See Part 1. D.2, E.2.h) ☑ NO ☐ YES

If "Yes", answer questions a - l. If "No", move on to Section 4.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may create a new water body.	D2b, D1h	☐	☐
b. The proposed action may result in an increase or decrease of over 10% or more than a 10 acre increase or decrease in the surface area of any body of water.	D2b	☐	☐
c. The proposed action may involve dredging more than 100 cubic yards of material from a wetland or water body.	D2a	☐	☐
d. The proposed action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body.	E2h	☐	☐
e. The proposed action may create turbidity in a waterbody, either from upland erosion, runoff or by disturbing bottom sediments.	D2a, D2h	☐	☐
f. The proposed action may include construction of one or more intake(s) for withdrawal of water from surface water.	D2c	☐	☐
g. The proposed action may include construction of one or more outfall(s) for discharge of wastewater to surface water(s).	D2d	☐	☐
h. The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.	D2e	☐	☐
i. The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.	E2h	☐	☐
j. The proposed action may involve the application of pesticides or herbicides in or around any water body.	D2q, E2h	☐	☐
k. The proposed action may require the construction of new, or expansion of existing, wastewater treatment facilities.	D1a, D2d	☐	☐

l. Other impacts: _____		☐	☐

4. Impact on groundwater

The proposed action may result in new or additional use of ground water, or may have the potential to introduce contaminants to ground water or an aquifer. (See Part 1. D.2.a, D.2.c, D.2.d, D.2.p, D.2.q, D.2.t) ☑ NO ☐ YES

If "Yes", answer questions a - h. If "No", move on to Section 5.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may require new water supply wells, or create additional demand on supplies from existing water supply wells.	D2c	☐	☐
b. Water supply demand from the proposed action may exceed safe and sustainable withdrawal capacity rate of the local supply or aquifer. Cite Source: _____	D2c	☐	☐
c. The proposed action may allow or result in residential uses in areas without water and sewer services.	D1a, D2c	☐	☐
d. The proposed action may include or require wastewater discharged to groundwater.	D2d, E2l	☐	☐
e. The proposed action may result in the construction of water supply wells in locations where groundwater is, or is suspected to be, contaminated.	D2c, E1f, E1g, E1h	☐	☐
f. The proposed action may require the bulk storage of petroleum or chemical products over ground water or an aquifer.	D2p, E2l	☐	☐
g. The proposed action may involve the commercial application of pesticides within 100 feet of potable drinking water or irrigation sources.	E2h, D2q, E2l, D2c	☐	☐
h. Other impacts: _____		☐	☐

5. Impact on Flooding

The proposed action may result in development on lands subject to flooding. (See Part 1. E.2) ☑ NO ☐ YES

If "Yes", answer questions a - g. If "No", move on to Section 6.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in development in a designated floodway.	E2i	☐	☐
b. The proposed action may result in development within a 100 year floodplain.	E2j	☐	☐
c. The proposed action may result in development within a 500 year floodplain.	E2k	☐	☐
d. The proposed action may result in, or require, modification of existing drainage patterns.	D2b, D2e	☐	☐
e. The proposed action may change flood water flows that contribute to flooding.	D2b, E2i, E2j, E2k	☐	☐
f. If there is a dam located on the site of the proposed action, is the dam in need of repair, or upgrade?	E1e	☐	☐

g. Other impacts: _____		☐	☐

6. Impacts on Air

The proposed action may include a state regulated air emission source. (See Part 1. D.2.f., D.2.h, D.2.g) ☑ NO ☐ YES

If "Yes", answer questions a - f. If "No", move on to Section 7.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. If the proposed action requires federal or state air emission permits, the action may also emit one or more greenhouse gases at or above the following levels:			
i. More than 1000 tons/year of carbon dioxide (CO_2)	D2g	☐	☐
ii. More than 3.5 tons/year of nitrous oxide (N_2O)	D2g	☐	☐
iii. More than 1000 tons/year of carbon equivalent of perfluorocarbons (PFCs)	D2g	☐	☐
iv. More than .045 tons/year of sulfur hexafluoride (SF_6)	D2g	☐	☐
v. More than 1000 tons/year of carbon dioxide equivalent of hydrochloroflourocarbons (HFCs) emissions	D2g	☐	☐
vi. 43 tons/year or more of methane	D2h	☐	☐
b. The proposed action may generate 10 tons/year or more of any one designated hazardous air pollutant, or 25 tons/year or more of any combination of such hazardous air pollutants.	D2g	☐	☐
c. The proposed action may require a state air registration, or may produce an emissions rate of total contaminants that may exceed 5 lbs. per hour, or may include a heat source capable of producing more than 10 million BTU's per hour.	D2f, D2g	☐	☐
d. The proposed action may reach 50% of any of the thresholds in "a" through "c", above.	D2g	☐	☐
e. The proposed action may result in the combustion or thermal treatment of more than 1 ton of refuse per hour.	D2s	☐	☐
f. Other impacts: _____		☐	☐

7. Impact on Plants and Animals

The proposed action may result in a loss of flora or fauna. (See Part 1. E.2. m.-q.) ☑ NO ☐ YES

If "Yes", answer questions a - j. If "No", move on to Section 8.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may cause reduction in population or loss of individuals of any threatened or endangered species, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2o	☐	☐
b. The proposed action may result in a reduction or degradation of any habitat used by any rare, threatened or endangered species, as listed by New York State or the federal government.	E2o	☐	☐
c. The proposed action may cause reduction in population, or loss of individuals, of any species of special concern or conservation need, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2p	☐	☐
d. The proposed action may result in a reduction or degradation of any habitat used by any species of special concern and conservation need, as listed by New York State or the Federal government.	E2p	☐	☐

e. The proposed action may diminish the capacity of a registered National Natural Landmark to support the biological community it was established to protect.	E3c	☐	☐
f. The proposed action may result in the removal of, or ground disturbance in, any portion of a designated significant natural community. Source: _____	E2n	☐	☐
g. The proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site.	E2m	☐	☐
h. The proposed action requires the conversion of more than 10 acres of forest, grassland or any other regionally or locally important habitat. Habitat type & information source: _____	E1b	☐	☐
i. Proposed action (commercial, industrial or recreational projects, only) involves use of herbicides or pesticides.	D2q	☐	☐
j. Other impacts: _____		☐	☐

8. Impact on Agricultural Resources

The proposed action may impact agricultural resources. (See Part 1. E.3.a. and b.) ☑ NO ☐ YES

If "Yes", answer questions a - h. If "No", move on to Section 9.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may impact soil classified within soil group 1 through 4 of the NYS Land Classification System.	E2c, E3b	☐	☐
b. The proposed action may sever, cross or otherwise limit access to agricultural land (includes cropland, hayfields, pasture, vineyard, orchard, etc).	E1a, Elb	☐	☐
c. The proposed action may result in the excavation or compaction of the soil profile of active agricultural land.	E3b	☐	☐
d. The proposed action may irreversibly convert agricultural land to non-agricultural uses, either more than 2.5 acres if located in an Agricultural District, or more than 10 acres if not within an Agricultural District.	E1b, E3a	☐	☐
e. The proposed action may disrupt or prevent installation of an agricultural land management system.	El a, E1b	☐	☐
f. The proposed action may result, directly or indirectly, in increased development potential or pressure on farmland.	C2c, C3, D2c, D2d	☐	☐
g. The proposed project is not consistent with the adopted municipal Farmland Protection Plan.	C2c	☐	☐
h. Other impacts: _____		☐	☐

9. Impact on Aesthetic Resources

The land use of the proposed action are obviously different from, or are in sharp contrast to, current land use patterns between the proposed project and a scenic or aesthetic resource. (Part 1. E.1.a, E.1.b, E.3.h.) ☑ NO ☐ YES

If "Yes", answer questions a - g. If "No", go to Section 10.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Proposed action may be visible from any officially designated federal, state, or local scenic or aesthetic resource.	E3h	☐	☐
b. The proposed action may result in the obstruction, elimination or significant screening of one or more officially designated scenic views.	E3h, C2b	☐	☐
c. The proposed action may be visible from publicly accessible vantage points: i. Seasonally (e.g., screened by summer foliage, but visible during other seasons) ii. Year round	E3h	 ☐ ☐	 ☐ ☐
d. The situation or activity in which viewers are engaged while viewing the proposed action is: i. Routine travel by residents, including travel to and from work ii. Recreational or tourism based activities	E3h E2q, E1c	 ☐ ☐	 ☐ ☐
e. The proposed action may cause a diminishment of the public enjoyment and appreciation of the designated aesthetic resource.	E3h	☐	☐
f. There are similar projects visible within the following distance of the proposed project: 0-1/2 mile ½ -3 mile 3-5 mile 5+ mile	D1a, E1a, D1f, D1g	☐	☐
g. Other impacts: _____		☐	☐

10. Impact on Historic and Archeological Resources

The proposed action may occur in or adjacent to a historic or archaeological resource. (Part 1. E.3.e, f. and g.) ☐ NO ☑ YES

If "Yes", answer questions a - e. If "No", go to Section 11.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may occur wholly or partially within, or substantially contiguous to, any buildings, archaeological site or district which is listed on the National or State Register of Historical Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places.	E3e	☐	☑
b. The proposed action may occur wholly or partially within, or substantially contiguous to, an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory.	E3f	☑	☐
c. The proposed action may occur wholly or partially within, or substantially contiguous to, an archaeological site not included on the NY SHPO inventory. Source: _____	E3g	☑	☐

d. Other impacts: _____		☑	☐
e. If any of the above (a-d) are answered "Moderate to large impact may occur", continue with the following questions to help support conclusions in Part 3:			
i. The proposed action may result in the destruction or alteration of all or part of the site or property.	E3e, E3g, E3f	☑	☐
ii. The proposed action may result in the alteration of the property's setting or integrity.	E3e, E3f, E3g, E1a, E1b	☑	☐
iii. The proposed action may result in the introduction of visual elements which are out of character with the site or property, or may alter its setting.	E3e, E3f, E3g, E3h, C2, C3	☑	☐

11. Impact on Open Space and Recreation

The proposed action may result in a loss of recreational opportunities or a reduction of an open space resource as designated in any adopted municipal open space plan. (See Part 1. C.2.c, E.1.c., E.2.q.)

☑ NO ☐ YES

If "Yes", answer questions a - e. If "No", go to Section 12.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in an impairment of natural functions, or "ecosystem services", provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat.	D2e, E1b E2h, E2m, E2o, E2n, E2p	☐	☐
b. The proposed action may result in the loss of a current or future recreational resource.	C2a, E1c, C2c, E2q	☐	☐
c. The proposed action may eliminate open space or recreational resource in an area with few such resources.	C2a, C2c E1c, E2q	☐	☐
d. The proposed action may result in loss of an area now used informally by the community as an open space resource.	C2c, E1c	☐	☐
e. Other impacts: _____		☐	☐

12. Impact on Critical Environmental Areas

The proposed action may be located within or adjacent to a critical environmental area (CEA). (See Part 1. E.3.d)

☑ NO ☐ YES

If "Yes", answer questions a - c. If "No", go to Section 13.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in a reduction in the quantity of the resource or characteristic which was the basis for designation of the CEA.	E3d	☐	☐
b. The proposed action may result in a reduction in the quality of the resource or characteristic which was the basis for designation of the CEA.	E3d	☐	☐
c. Other impacts: _____		☐	☐

13. Impact on Transportation

The proposed action may result in a change to existing transportation systems. (See Part 1. D.2.j) ☑ NO ☐ YES

If "Yes", answer questions a - f. If "No", go to Section 14.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Projected traffic increase may exceed capacity of existing road network.	D2j	☐	☐
b. The proposed action may result in the construction of paved parking area for 500 or more vehicles.	D2j	☐	☐
c. The proposed action will degrade existing transit access.	D2j	☐	☐
d. The proposed action will degrade existing pedestrian or bicycle accommodations.	D2j	☐	☐
e. The proposed action may alter the present pattern of movement of people or goods.	D2j	☐	☐
f. Other impacts: _____		☐	☐

14. Impact on Energy

The proposed action may cause an increase in the use of any form of energy. (See Part 1. D.2.k) ☑ NO ☐ YES

If "Yes", answer questions a - e. If "No", go to Section 15.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action will require a new, or an upgrade to an existing, substation.	D2k	☐	☐
b. The proposed action will require the creation or extension of an energy transmission or supply system to serve more than 50 single or two-family residences or to serve a commercial or industrial use.	D1f, D1q, D2k	☐	☐
c. The proposed action may utilize more than 2,500 MWhrs per year of electricity.	D2k	☐	☐
d. The proposed action may involve heating and/or cooling of more than 100,000 square feet of building area when completed.	D1g	☐	☐
e. Other Impacts: _____			

15. Impact on Noise, Odor, and Light

The proposed action may result in an increase in noise, odors, or outdoor lighting. (See Part 1. D.2.m., n., and o.) ☑ NO ☐ YES

If "Yes", answer questions a - f. If "No", go to Section 16.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may produce sound above noise levels established by local regulation.	D2m	☐	☐
b. The proposed action may result in blasting within 1,500 feet of any residence, hospital, school, licensed day care center, or nursing home.	D2m, E1d	☐	☐
c. The proposed action may result in routine odors for more than one hour per day.	D2o	☐	☐

d. The proposed action may result in light shining onto adjoining properties.	D2n	☐	☐
e. The proposed action may result in lighting creating sky-glow brighter than existing area conditions.	D2n, E1a	☐	☐
f. Other impacts: _____		☐	☐

16. Impact on Human Health

The proposed action may have an impact on human health from exposure to new or existing sources of contaminants. (See Part 1.D.2.q., E.1. d. f. g. and h.) ☐ NO ☑ YES

If "Yes", answer questions a - m. If "No", go to Section 17.

	Relevant Part I Question(s)	No,or small impact may cccur	Moderate to large impact may occur
a. The proposed action is located within 1500 feet of a school, hospital, licensed day care center, group home, nursing home or retirement community.	E1d	☑	☐
b. The site of the proposed action is currently undergoing remediation.	E1g, E1h	☑	☐
c. There is a completed emergency spill remediation, or a completed environmental site remediation on, or adjacent to, the site of the proposed action.	E1g, E1h	☑	☐
d. The site of the action is subject to an institutional control limiting the use of the property (e.g., easement or deed restriction).	E1g, E1h	☑	☐
e. The proposed action may affect institutional control measures that were put in place to ensure that the site remains protective of the environment and human health.	E1g, E1h	☑	☐
f. The proposed action has adequate control measures in place to ensure that future generation, treatment and/or disposal of hazardous wastes will be protective of the environment and human health.	D2t	☑	☐
g. The proposed action involves construction or modification of a solid waste management facility.	D2q, E1f	☑	☐
h. The proposed action may result in the unearthing of solid or hazardous waste.	D2q, E1f	☑	☐
i. The proposed action may result in an increase in the rate of disposal, or processing, of solid waste.	D2r, D2s	☑	☐
j. The proposed action may result in excavation or other disturbance within 2000 feet of a site used for the disposal of solid or hazardous waste.	E1f, E1g E1h	☑	☐
k. The proposed action may result in the migration of explosive gases from a landfill site to adjacent off site structures.	E1f, E1g	☑	☐
l. The proposed action may result in the release of contaminated leachate from the project site.	D2s, E1f, D2r	☑	☐
m. Other impacts: The proposed action will introduce measures to reduce existing lead hazards.		☐	☑

17. Consistency with Community Plans

The proposed action is not consistent with adopted land use plans. ☐ NO ☑ YES

(See Part 1. C.1, C.2. and C.3.)

If "Yes", answer questions a - h. If "No", go to Section 18.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action's land use components may be different from, or in sharp contrast to, current surrounding land use pattern(s).	C2, C3, D1a E1a, E1b	☑	☐
b. The proposed action will cause the permanent population of the city, town or village in which the project is located to grow by more than 5%.	C2	☑	☐
c. The proposed action is inconsistent with local land use plans or zoning regulations.	C2, C2, C3	☑	☐
d. The proposed action is inconsistent with any County plans, or other regional land use plans.	C2, C2	☑	☐
e. The proposed action may cause a change in the density of development that is not supported by existing infrastructure or is distant from existing infrastructure.	C3, D1c, D1d, D1f, D1d, Elb	☑	☐
f. The proposed action is located in an area characterized by low density development that will require new or expanded public infrastructure.	C4, D2c, D2d D2j	☑	☐
g. The proposed action may induce secondary development impacts (e.g., residential or commercial development not included in the proposed action)	C2a	☑	☐
h. Other: The proposed action will amend the municipal conservation code for the identification, reduction and control of hazards due to the presence of lead.		☐	☑

18. Consistency with Community Character

The proposed project is inconsistent with the existing community character. ☑ NO ☐ YES

(See Part 1. C.2, C.3, D.2, E.3)

If "Yes", answer questions a - g. If "No", proceed to Part 3.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may replace or eliminate existing facilities, structures, or areas of historic importance to the community.	E3e, E3f, E3g	☐	☐
b. The proposed action may create a demand for additional community services (e.g. schools, police and fire)	C4	☐	☐
c. The proposed action may displace affordable or low-income housing in an area where there is a shortage of such housing.	C2, C3, D1f D1g, E1a	☐	☐
d. The proposed action may interfere with the use or enjoyment of officially recognized or designated public resources.	C2, E3	☐	☐
e. The proposed action is inconsistent with the predominant architectural scale and character.	C2, C3	☐	☐
f. Proposed action is inconsistent with the character of the existing natural landscape.	C2, C3 E1a, E1b E2g, E2h	☐	☐
g. Other impacts:		☐	☐

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Full Environmental Assessment Form
Part 3 - Evaluation of the Magnitude and Importance of Project Impacts and Determination of Significance

Part 3 provides the reasons in support of the determination of significance. The lead agency must complete Part 3 for every question in Part 2 where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.

Based on the analysis in Part 3, the lead agency must decide whether to require an environmental impact statement to further assess the proposed action or whether available information is sufficient for the lead agency to conclude that the proposed action will not have a significant adverse environmental impact. By completing the certification on the next page, the lead agency can complete its determination of significance.

Reasons Supporting This Determination:
To complete this section:

- Identify the impact based on the Part 2 responses and describe its magnitude. Magnitude considers factors such as severity, size or extent of an impact.
- Assess the importance of the impact. Importance relates to the geographic scope, duration, probability of the impact occurring, number of people affected by the impact and any additional environmental consequences if the impact were to occur.
- The assessment should take into consideration any design element or project changes.
- Repeat this process for each Part 2 question where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.
- Provide the reason(s) why the impact may, or will not, result in a significant adverse environmental impact
- For Conditional Negative Declarations identify the specific condition(s) imposed that will modify the proposed action so that no significant adverse environmental impacts will result.
- Attach additional sheets, as needed.

(See Part 3 - Additional Information)

Determination of Significance - Type 1 and Unlisted Actions

SEQR Status: ☑ Type 1 ☐ Unlisted

Identify portions of EAF completed for this Project: ☑ Part 1 ☑ Part 2 ☑ Part 3

Upon review of the information recorded on this EAF, as noted, plus this additional support information

and considering both the magnitude and importance of each identified potential impact, it is the conclusion of the _____ as lead agency that:

☐ A. This project will result in no significant adverse impacts on the environment, and, therefore, an environmental impact statement need not be prepared. Accordingly, this negative declaration is issued.

☐ B. Although this project could have a significant adverse impact on the environment, that impact will be avoided or substantially mitigated because of the following conditions which will be required by the lead agency:

There will, therefore, be no significant adverse impacts from the project as conditioned, and, therefore, this conditioned negative declaration is issued. A conditioned negative declaration may be used only for UNLISTED actions (see 6 NYCRR 617.7(d)).

☑ C. This Project may result in one or more significant adverse impacts on the environment, and an environmental impact statement must be prepared to further assess the impact(s) and possible mitigation and to explore alternatives to avoid or reduce those impacts. Accordingly, this positive declaration is issued.

Name of Action: City of Syracuse Proposed Lead Ordinance	
Name of Lead Agency: City of Syracuse	
Name of Responsible Officer in Lead Agency: Hon. Ben Walsh	
Title of Responsible Officer: Mayor	
Signature of Responsible Officer in Lead Agency:	Date:
Signature of Preparer (if different from Responsible Officer)	Date:

For Further Information:

Contact Person: Ms. Stephanie Pasquale

Address: Department of Neighborhood and Business Development, 201 East Washington Street, 6th Floor, Syracuse, NY 13202

Telephone Number: (315) 448-8005

E-mail: spasquale@syrgov.net

For Type 1 Actions and Conditioned Negative Declarations, a copy of this Notice is sent to:

Chief Executive Officer of the political subdivision in which the action will be principally located (e.g., Town / City / Village of)
Other involved agencies (if any)
Applicant (if any)
Environmental Notice Bulletin: http://www.dec.ny.gov/enb/enb.html

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Appendix D

List of Local Protected Sites

Local Protected Sites / Syracuse, New York

updated 3/15

ADDRESS	NAME	Exterior designation	Interior designation	National Register listed property
105 Academy Green	Academy Green	*		
300 Avery Avenue S	Pass Arboretum	*		
718-720 Beech Street S	United Baptist Church	*	*	
836 Butternut Street	Former Kress Drug Store	*		
438 Columbus Avenue	Stickley House	*	*	*
940 Comstock Avenue	Oakwood Cemetery	*		
1800 Erie Boulevard W	Geddes Pump House	*		
711 Fayette Street E	A.M.E. Zion Church	*		
2002-12 Genesee Street E	Jewish War Veterans Home	*		
1104 Genesee Street E	Medical offices	*		
125 Gertrude Street	Residence	*		
115 Green Street	Residence	*		
220 Green Street	Residence	*		
306 Hawley Avenue	George Beadle House	*		*
418 Howard Street	Residence	*		
437 James Street	Church of the Savior	*	*	
723 James Street	John and Rhobie Peck House	*		
914 Lodi Street	Rose Hill Cemetery	*		
922 Madison Street	Wilson Apartments	*		
118 Merriman Avenue	Residence	*		
500 McBride Street N	Truesdell/Schoeneck House	*		
714 McBride Street N	Louis Will Residence	*		
328, 329 Milburn Drive	Village Green	*		
310 Montgomery Street	St. Paul's Episcopal Cathedral	*	*	*
501 Onondaga Avenue	Lower Onondaga Park	*		*
501 Onondaga Avenue	Upper Onondaga Park	*		*
232 Onondaga Street E	Plymouth Congregational Church	*		*
500 Onondaga Street W	Henry J. Mowry House	*		
514 (506) Onondaga Street W	Dr. Grumen House (AAA Building)	*		
678 Onondaga Street W	Neal-Baum House	*		
726 Onondaga Street W	Alexander T. Brown House	*		*
927 Park Avenue	Sacred Heart Church	*	*	
501 Park Street	Holy Trinity Church	*	*	

Local Protected Sites / Syracuse, New York

updated 3/15

1400-08 Park Street	St. John the Baptist Church	*	*	
1509 Park Street	Parke S. Avery House	*		
204 Robineau Road	Robineau House	*		
206 (210) Robineau Road	Robineau Studio	*		
541 Robineau Road	Elmwood Park	*		*
812 Salina Street N	Church of the Assumption	*	*	*
362 Salina Street S	Landmark Theater	*	*	*
1431 Salina Street S	Residence	*		
1631 Salina Street S	Gothic Cottage	*		*
1641 Salina Street S	New Jerusalem Church of God in Christ	*		*
2110-12 Salina Street S	South Presbyterian Church	*	*	
417 Seneca Turnpike W	Forman House	*		
213 Scottholm Terrace	Skoler House	*	*	*
214 State Street N	Former St. John the Evangelist Rectory	*		
301 State Street S	Fayette Park	*		
206 Summit Avenue	Dunfee House	*		*
501 Ostrum Avenue	Thornden Park	*		*
105. 109, 115 Townsend Street S	Brennan Motor Manufacturing	*		
307 Townsend Street S	Hamilton White House	*		*
703 Walnut Avenue	Horace Wilkinson House (Phi Delta Theta F	*		*
431-41 Warren Street S	WFBL Building (431-35, 437-41)	*		
233 Washington Street E	Syracuse City Hall	*		*
501 Washington Street E	Brown's Place	*		
1010 Washington Street E	Ignatius Fiesinger House	*		
818 West Street S	Second Olivet Missionary Church	*		
819 West Street S	Nathan Breed House	*		

SBL	Street Number	Street Name	LPSS	NHR
069.-07-08.0	200	Academy Green		NR Eligible (SHPO)
069.-07-35.0	105	Academy Grn	Local Protected Site or Local District	
052.-15-15.0	100	Acorn Path & Comstock Ave	Local Protected Site or Local District	NR Listed
082.-05-25.0	139	Alanson Rd	Eligible/Architecturally Significant	
082.-05-35.0	111	Alanson Rd	Eligible/Architecturally Significant	
082.-09-16.0	205	Alanson Rd		NR Listed
082.-09-17.0	203	Alanson Rd		NR Listed
082.-09-18.0	201	Alanson Rd		NR Listed
082.-07-16.0	202	Alanson Rd To Stinard Ave		NR Listed
082.-07-17.0	204	Alanson Rd To Stinard Ave		NR Listed
037.-20-43.0	437	Allen St	Eligible/Architecturally Significant	
045.-13-28.0	725	Allen St		NR Eligible (SHPO)
045.-14-19.0	754	Allen St		NR Eligible (SHPO)
037.-04-14.0	306	Allen St	Eligible/Architecturally Significant	
037.-05-25.0	315	Allen St	Eligible/Architecturally Significant	
037.-05-26.0	309	Allen St		NR Eligible (SHPO)
045.-16-13.0	680	Allen St		NR Eligible (SHPO)
037.-21-03.0	416	Allen St		NR Eligible (SHPO)
037.-21-11.0	464	Allen St		NR Listed
037.-20-26.0	557	Allen St & Harvard Pl	Eligible/Architecturally Significant	
045.-02-38.0	601	Allen St & Harvard Pl		NR Eligible (SHPO)
037.-05-27.0	301-05	Allen St & Lexington Ave		NR Eligible (SHPO)
007.-19-06.0	811	Alvord St N		NR Eligible (SHPO)
080.-05-02.0	105	Arden Dr		NR Listed
080.-05-03.0	103	Arden Dr		NR Listed
082.-08-26.0	108	Arden Dr & Geddes St S		NR Listed
082.-04-42.0	117-19	Arlington Ave	Eligible/Architecturally Significant	
082.-04-46.0	101	Arlington Ave	Eligible/Architecturally Significant	
079.-03-19.0	231	Arlington Ave	Eligible/Architecturally Significant	
079.-05-01.0	300-02	Arlington Ave & Charmouth	Eligible/Architecturally Significant	
008.-17-02.0	208-10	Ash St		NR Eligible (SHPO)
088.-19-16.0	116	Atkinson Ave	Eligible/Architecturally Significant	
088.-19-17.0	120	Atkinson Ave	Eligible/Architecturally Significant	
111.-01-05.0	611	Avery Ave	Eligible/Architecturally Significant	
111.-19-20.0	401	Avery Ave & Hamilton St	Eligible/Architecturally Significant	
110.-17-67.0	301	Avery Ave S & Bryant Ave	Eligible/Architecturally Significant	
098.2-03-02.0	300	Avery Ave S & Salisbury R	Local Protected Site or Local District	
092.-07-29.0	205	Barrett St	Eligible/Architecturally Significant	
003.-23-05.0	714-16	Bear St	Eligible/Architecturally Significant	
002.-22-05.0	512	Bear St		NR Eligible (SHPO)
002.-22-06.0	514	Bear St & Spring St	Eligible/Architecturally Significant	
084.-22-16.0	116	Beard Ave W		NR Eligible (SHPO)
038.-13-37.0	605	Beattie St	Eligible/Architecturally Significant	
046.-04-19.0	720	Beech St S & Judson St	Local Protected Site or Local District	
016.-13-10.0	224	Beecher St	Eligible/Architecturally Significant	
106.-01-06.0	1010	Belden Ave W & Sand St &	Eligible/Architecturally Significant	
106.-02-02.0	902-08	Belden Ave W & Van Rensse		NR Eligible (SHPO)
106.-03-10.0	842	Belden Ave W & Van Rensse		NR Eligible (SHPO)
087.-05-02.0	915	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
087.-05-03.0	913	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
087.-05-04.0	911	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
087.-05-05.0	909	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
087.-05-06.0	907	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
087.-05-07.0	905	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
087.-05-08.0	903	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
087.-05-09.0	901	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
091.-14-32.0	1620	Bellevue Ave	Eligible/Architecturally Significant	
091.-14-33.0	1622	Bellevue Ave	Eligible/Architecturally Significant	
087.-01-02.0	1167-69	Bellevue Ave	Eligible/Architecturally Significant	
087.-01-03.0	1161-63	Bellevue Ave	Eligible/Architecturally Significant	
087.-02-03.0	1133	Bellevue Ave	Eligible/Architecturally Significant	
087.-02-05.0	1123	Bellevue Ave	Eligible/Architecturally Significant	

087.-02-07.0	1111-13	Bellevue Ave	Eligible/Architecturally Significant	
087.-04-04.1	1017	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
087.-04-05.0	1005	Bellevue Ave	Eligible/Architecturally Significant	NR Listed
092.-21-26.0	1044	Bellevue Ave	Eligible/Architecturally Significant	
092.-21-28.0	1052-54	Bellevue Ave	Eligible/Architecturally Significant	
092.-14-39.0	948-50	Bellevue Ave	Eligible/Architecturally Significant	
092.-14-40.0	956	Bellevue Ave	Eligible/Architecturally Significant	
088.-05-02.0	1617	Bellevue Ave	Eligible/Architecturally Significant	
092.-21-29.0	1056-58	Bellevue Ave	Eligible/Architecturally Significant	
092.-21-30.0	1060	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-13.0	1104	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-14.0	1108-10	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-15.0	1112-14	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-16.0	1116-18	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-18.1	1128	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-19.0	1132	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-20.0	1134-36	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-22.0	1144	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-23.0	1148-50	Bellevue Ave	Eligible/Architecturally Significant	
092.-22-24.0	1152-54	Bellevue Ave	Eligible/Architecturally Significant	
092.-23-17.0	1216	Bellevue Ave	Eligible/Architecturally Significant	
088.-08-07.0	1305-07	Bellevue Ave	Eligible/Architecturally Significant	
088.-09-06.0	1211	Bellevue Ave		NR Eligible (SHPO)
091.-15-17.0	1838-40	Bellevue Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
091.-15-19.0	1846-48	Bellevue Ave	Eligible/Architecturally Significant	
092.-21-31.0	1062	Bellevue Ave & Bradley St	Eligible/Architecturally Significant	
087.-05-01.0	917	Bellevue Ave & Clairemont	Eligible/Architecturally Significant	NR Listed
087.-04-06.0	1001	Bellevue Ave & Clairemont	Eligible/Architecturally Significant	NR Listed
092.-21-17.0	1000	Bellevue Ave & Dudley St	Eligible/Architecturally Significant	
087.-01-01.0	1173	Bellevue Ave & Geddes St		NR Eligible (SHPO)
087.-04-01.0	1027	Bellevue Ave & Hubbell Av	Eligible/Architecturally Significant	
091.-14-35.0	1710	Bellevue Ave & Kandace St	Eligible/Architecturally Significant	
091.-15-09.0	1800	Bellevue Ave & Kandace St	Eligible/Architecturally Significant	
087.-03-01.0	1047	Bellevue Ave & Roberts Av	Eligible/Architecturally Significant	
087.-02-06.0	1117	Bellevue Ave To Grant Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
075.-14-08.0	112	Berger Ave	Eligible/Architecturally Significant	
052.-14-02.0	202	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-03.0	204	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-04.0	206	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-05.1	208	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-06.1	210	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-07.0	300	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-08.0	302	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-11-24.0	205	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-11-25.0	203	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-11-26.0	201	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-12-19.0	111	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-12-20.0	109	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-12-21.0	107	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-09.0	306	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-10.0	310	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-11.0	312	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-15-05.0	320	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-15-06.0	322	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-15-07.0	324	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-15-08.0	326	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-15-09.0	330	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-15-10.0	332	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-15-11.0	334	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-16-08.0	313	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-16-09.0	311	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-16-10.0	309	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-16-11.0	305	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-16-12.0	303	Berkeley Dr	Local Protected Site or Local District	NR Listed

052.-13-03.0	102	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-13-04.0	104	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-13-05.0	106	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-13-06.0	108	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-13-07.0	110	Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-14-12.0	316	Berkeley Dr & Acorn Path	Local Protected Site or Local District	NR Listed
052.-15-04.0	318	Berkeley Dr & Acorn Path	Local Protected Site or Local District	NR Listed
052.-14-01.0	200	Berkeley Dr & Circle Rd	Local Protected Site or Local District	NR Listed
052.-12-18.0	113	Berkeley Dr & Dorset Rd	Local Protected Site or Local District	NR Listed
052.-12-22.0	101	Berkeley Dr & Stratford S	Local Protected Site or Local District	NR Listed
052.-13-02.0	100	Berkeley Dr & Stratford S	Local Protected Site or Local District	NR Listed
052.-11-23.0	209	Berkeley Dr & Terrace Rd	Local Protected Site or Local District	NR Listed
052.-15-12.0	338	Berkeley Dr At Broad St	Local Protected Site or Local District	NR Listed
052.-17-13.0	345	Berkeley Dr At Broad St	Local Protected Site or Local District	NR Listed
087.-15-15.0	173	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-16.0	167	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-17.0	153	Beverly Rd		NR Listed
087.-15-18.0	145	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-19.0	141	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-20.0	135-37	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-21.0	131	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-22.0	125-27	Beverly Rd		NR Listed
087.-15-23.0	119	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-24.0	133	Beverly Rd		NR Listed
087.-14-07.0	120	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-14-08.0	122	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-14-09.0	130	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-14-10.0	134-36	Beverly Rd		NR Listed
087.-14-11.0	142	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-14-12.0	146	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-14-13.0	154	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-14-14.0	160	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-14-15.0	168	Beverly Rd		NR Listed
087.-14-16.0	172-74	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-21.1	131	Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-15-14.0	179	Beverly Rd & Crossett St	Eligible/Architecturally Significant	NR Listed
087.-14-06.0	104	Beverly Rd & Stolp Ave	Eligible/Architecturally Significant	NR Listed
084.-21-11.0	110	Borden Ave W	Eligible/Architecturally Significant	
019.-03-17.0	13	Brattle Rd	Local Protected Site or Local District	
014.-08-03.0	263	Brattle Rd	Local Protected Site or Local District	
014.-08-04.0	259	Brattle Rd	Local Protected Site or Local District	
014.-08-05.0	233	Brattle Rd	Local Protected Site or Local District	
014.-08-06.0	231	Brattle Rd	Local Protected Site or Local District	
014.-08-07.0	229	Brattle Rd	Local Protected Site or Local District	
014.-08-08.0	227	Brattle Rd	Local Protected Site or Local District	
014.-08-09.0	225	Brattle Rd	Local Protected Site or Local District	
014.-08-10.0	223	Brattle Rd	Local Protected Site or Local District	
014.-08-11.0	221	Brattle Rd	Local Protected Site or Local District	
014.-08-12.0	219	Brattle Rd	Local Protected Site or Local District	
014.-08-13.0	217	Brattle Rd	Local Protected Site or Local District	
014.-08-14.0	215	Brattle Rd	Local Protected Site or Local District	
014.-08-15.0	211	Brattle Rd	Local Protected Site or Local District	
014.-08-16.0	209	Brattle Rd	Local Protected Site or Local District	
014.-08-17.0	207	Brattle Rd	Local Protected Site or Local District	
019.-03-18.0	11	Brattle Rd	Local Protected Site or Local District	
019.-03-20.0	7	Brattle Rd	Local Protected Site or Local District	
019.-03-21.0	5	Brattle Rd	Local Protected Site or Local District	
014.-09-40.0	204	Brattle Rd	Local Protected Site or Local District	
014.-09-41.0	206	Brattle Rd	Local Protected Site or Local District	
014.-09-42.0	208	Brattle Rd	Local Protected Site or Local District	
014.-09-43.0	210	Brattle Rd	Local Protected Site or Local District	
014.-09-44.0	216	Brattle Rd	Local Protected Site or Local District	
014.-09-45.0	222	Brattle Rd	Local Protected Site or Local District	
014.-09-46.0	224	Brattle Rd	Local Protected Site or Local District	

014.-09-47.0	226	Brattle Rd	Local Protected Site or Local District	
014.-09-48.0	228	Brattle Rd	Local Protected Site or Local District	
014.-09-49.0	232	Brattle Rd	Local Protected Site or Local District	
014.-09-50.0	236	Brattle Rd	Local Protected Site or Local District	
014.-09-51.0	238	Brattle Rd	Local Protected Site or Local District	
014.-09-52.0	240	Brattle Rd	Local Protected Site or Local District	
014.-09-53.0	242	Brattle Rd	Local Protected Site or Local District	
014.-09-54.0	244	Brattle Rd	Local Protected Site or Local District	
014.-09-55.0	248	Brattle Rd	Local Protected Site or Local District	
014.-09-56.0	250	Brattle Rd	Local Protected Site or Local District	
014.-09-57.0	260	Brattle Rd	Local Protected Site or Local District	
019.-07-02.0	4	Brattle Rd	Local Protected Site or Local District	
019.-07-03.0	6	Brattle Rd	Local Protected Site or Local District	
019.-07-04.0	8	Brattle Rd	Local Protected Site or Local District	
019.-07-05.0	10	Brattle Rd	Local Protected Site or Local District	
019.-03-22.0	1	Brattle Rd & Dewitt St	Local Protected Site or Local District	
019.-07-01.0	2	Brattle Rd & Dewitt St	Local Protected Site or Local District	
014.-08-02.0	267	Brattle Rd & Rugby Rd	Local Protected Site or Local District	
014.-09-59.0	268	Brattle Rd & Rugby Rd	Local Protected Site or Local District	
019.-03-16.0	15	Brattle Rd & Sedgwick Dr	Local Protected Site or Local District	
014.-08-18.0	201	Brattle Rd & Sedgwick Dr	Local Protected Site or Local District	
019.-07-06.0	12	Brattle Rd & Sedgwick Dr	Local Protected Site or Local District	
077.-19-19.0	148-50	Brighton Ave W	Eligible/Architecturally Significant	
110.-13-48.0	242	Bryant Ave		NR Eligible (SHPO)
110.-13-64.0	330	Bryant Ave	Eligible/Architecturally Significant	
088.-02-23.0	107	Bungalow Terr	Eligible/Architecturally Significant	
088.-01-16.0	120	Bungalow Terr	Eligible/Architecturally Significant	
088.-01-17.0	122	Bungalow Terr	Eligible/Architecturally Significant	
019.-03-26.0	108	Burlingame Rd	Local Protected Site or Local District	
019.-03-27.0	104	Burlingame Rd	Local Protected Site or Local District	
019.-03-28.0	111	Burlingame Rd	Local Protected Site or Local District	
019.-03-30.0	107	Burlingame Rd	Local Protected Site or Local District	
019.-03-32.0	103	Burlingame Rd	Local Protected Site or Local District	
019.-03-33.0	101	Burlingame Rd	Local Protected Site or Local District	
019.-04-01.0	100	Burlingame Rd	Local Protected Site or Local District	
019.-04-02.0	102	Burlingame Rd	Local Protected Site or Local District	
019.-03-25.0	110	Burlingame Rd & Dewitt St	Local Protected Site or Local District	
029.-18-07.0	924	Burnet Ave	Eligible/Architecturally Significant	
103.-08-03.0	112-16	Burnet Ave		NR Eligible (SHPO)
103.-10-02.0	204	Burnet Ave	Eligible/Architecturally Significant	
103.-10-03.0	210	Burnet Ave	Eligible/Architecturally Significant	
103.-11-04.0	312	Burnet Ave	Eligible/Architecturally Significant	
103.-11-05.0	314	Burnet Ave	Eligible/Architecturally Significant	
103.-11-06.0	316	Burnet Ave	Eligible/Architecturally Significant	
103.-03-14.0	111-15	Burnet Ave	Eligible/Architecturally Significant	
103.-07-07.0	215	Burnet Ave	Eligible/Architecturally Significant	
030.-05-01.0	400	Burnet Ave & Catherine St		NR Listed
103.-09-01.0	122-24	Burnet Ave & Decker St &	Eligible/Architecturally Significant	
103.-07-05.0	219	Burnet Ave & Mc Bride St	Eligible/Architecturally Significant	
029.-10-12.0	1101	Burnet Ave & Sherwood Ave	Eligible/Architecturally Significant	
110.-11-31.0	124-26	Burnet Pk Dr		NR Eligible (SHPO)
110.-16-65.0	323	Burnet Pk Dr & Whittier A	Eligible/Architecturally Significant	NR Eligible (SHPO)
016.-02-05.0	622	Butternut St	Eligible/Architecturally Significant	
016.-02-18.0	788-90	Butternut St & Alvord St	Eligible/Architecturally Significant	
017.-05-06.0	416-20	Butternut St & Mcbride St	Eligible/Architecturally Significant	
015.-10-25.0	900	Butternut St & Park St		NR Eligible (SHPO)
015.-11-38.0	836	Butternut St & Park St	Local Protected Site or Local District	
009.-26-17.0	781	Butternut St & Peter St &	Eligible/Architecturally Significant	
037.-21-26.0	245	Cambridge St	Eligible/Architecturally Significant	
008.-02-04.0	207	Catawba St		NR Eligible (SHPO)
018.-11-34.0	304	Catherine St		NR Listed
018.-11-36.0	308	Catherine St		NR Listed
018.-11-37.0	310	Catherine St		NR Listed
103.-05-07.0	323	Catherine St		NR Listed

103.-05-08.0	303-19	Catherine St		NR Listed
017.-18-05.0	509	Catherine St & Hickory St		NR Eligible (SHPO)
016.-01-06.0	710	Catherine St To Lodi St	Eligible/Architecturally Significant	
111.-14-18.0	212	Cayuga St	Eligible/Architecturally Significant	
111.-20-04.0	317	Cayuga St	Eligible/Architecturally Significant	
080.-07-06.0	600	Charmouth Dr		NR Listed
080.-07-07.0	602	Charmouth Dr		NR Listed
080.-07-08.0	604	Charmouth Dr		NR Listed
080.-07-09.0	606	Charmouth Dr		NR Listed
080.-07-10.0	608	Charmouth Dr		NR Listed
080.-07-11.0	610	Charmouth Dr		NR Listed
080.-10-16.0	611	Charmouth Dr		NR Listed
080.-10-17.0	609	Charmouth Dr		NR Listed
080.-10-18.0	607	Charmouth Dr		NR Listed
080.-10-19.0	605	Charmouth Dr		NR Listed
080.-10-20.0	603	Charmouth Dr		NR Listed
080.-10-15.0	613	Charmouth Dr At Stinard A		NR Listed
052.-14-14.0	129	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-15.0	127	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-16.0	125	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-17.0	121	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-18.1	119	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-18.2	117	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-19.0	115	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-20.0	113	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-21.0	111	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-22.0	107	Circle Rd	Local Protected Site or Local District	NR Listed
052.-15-02.0	136	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-08.0	100	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-09.0	102	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-10.0	106	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-11.1	108	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-12.0	112	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-13.0	114	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-14.0	116	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-15.0	118	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-16.0	120	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-17.0	124	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-18.0	126	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-19.0	128	Circle Rd	Local Protected Site or Local District	NR Listed
052.-13-20.0	130	Circle Rd	Local Protected Site or Local District	NR Listed
052.-14-13.0	133	Circle Rd & Acorn Path	Local Protected Site or Local District	NR Listed
052.-15-01.0	134	Circle Rd & Acorn Path	Local Protected Site or Local District	NR Listed
052.-15-03.0	140	Circle Rd & Acorn Path	Local Protected Site or Local District	NR Listed
052.-13-21.0	132	Circle Rd & Acorn Path	Local Protected Site or Local District	NR Listed
087.-13-04.0	308	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-13-05.0	312	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-13-06.0	316	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-13-07.0	318	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-13-08.0	328	Clairmonte Ave		NR Listed
087.-13-09.0	330	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-13-10.0	334-36	Clairmonte Ave		NR Listed
087.-13-11.0	338	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-13-12.0	346	Clairmonte Ave		NR Listed
087.-13-13.0	348	Clairmonte Ave		NR Listed
087.-13-14.0	354-56	Clairmonte Ave		NR Listed
087.-13-15.0	360	Clairmonte Ave		NR Listed
087.-13-16.0	364	Clairmonte Ave		NR Listed
087.-04-07.0	120	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-08.0	124	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-09.0	128	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-10.0	132	Clairmonte Ave		NR Listed
087.-04-11.0	138	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-12.0	142	Clairmonte Ave		NR Listed

087.-04-13.0	148	Clairmonte Ave	Eligible/Architecturally Significant	
087.-04-14.0	200	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-15.0	208	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-16.0	214	Clairmonte Ave		NR Listed
087.-04-17.0	218	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-18.0	224	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-19.0	228	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-04-20.0	232	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-14-21.0	365	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-14-22.0	361-63	Clairmonte Ave		NR Listed
087.-14-23.0	355	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-14-24.0	349	Clairmonte Ave		NR Listed
087.-14-25.0	345	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-14-26.0	341	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-14-27.0	337	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-14-28.0	331	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-14-29.0	321	Clairmonte Ave	Eligible/Architecturally Significant	NR Listed
087.-13-17.0	370	Clairmonte Ave & Crossett		NR Listed
087.-05-27.0	139	Clairmonte Ave & Ruskin A	Eligible/Architecturally Significant	NR Listed
045.-14-07.0	160	Clarke St & Allen St		NR Eligible (SHPO)
115.-07-03.0	931	Clinton N&court St W To S	Eligible/Architecturally Significant	
115.-19-03.0	669-81	Clinton N&division St W		NR Eligible (SHPO)
115.-14-02.0	800	Clinton N&spencer St To O	Eligible/Architecturally Significant	NR Eligible (SHPO)
104.-09-06.0	315	Clinton St N		NR Eligible (SHPO)
117.-02-03.0	931	Clinton St N & Court St W	Eligible/Architecturally Significant	
118.-06-03.0	669-81	Clinton St N & Division S		NR Eligible (SHPO)
104.-14-01.0	101	Clinton St N & Genesee St	Eligible/Architecturally Significant	NR Listed
117.-05-02.0	800	Clinton St N & Spencer St	Eligible/Architecturally Significant	NR Eligible (SHPO)
118.-03-01.1	721	Clinton St N & Spencer St		NR Eligible (SHPO)
104.-13-01.0	233	Clinton St N & Willow St	Eligible/Architecturally Significant	
115.-07-02.0	967	Clinton St N To Solar St	Eligible/Architecturally Significant	
117.-02-02.0	967	Clinton St N To Solar St	Eligible/Architecturally Significant	
101.-04-07.0	316	Clinton St S		NR Listed
101.-05-15.0	415-17	Clinton St S		NR Listed
101.-05-16.0	401	Clinton St S		NR Listed
101.-05-17.0	321-25	Clinton St S		NR Listed
101.-05-18.1	315-19	Clinton St S		NR Listed
101.-05-18.2	313 1/2	Clinton St S		NR Listed
101.-05-19.0	307-13	Clinton St S		NR Listed
101.-05-08.2	351	Clinton St S		
101.-14-04.0	416-30	Clinton St S & Jefferson		NR Listed
101.-04-08.0	318-22	Clinton St S & Walton St		NR Listed
101.-14-02.0	400	Clinton St S & Walton St		NR Listed
101.-14-03.0	410-14	Clinton St S To Walton St		NR Listed
110.-18-33.0	316	Coleridge Ave	Eligible/Architecturally Significant	
110.-20-14.0	116	Coleridge Ave		NR Eligible (SHPO)
050.-05-11.0	101	College Pl & University P		NR Listed
079.-01-08.0	116	Columbia Ave	Eligible/Architecturally Significant	
079.-05-18.0	215	Columbia Ave	Eligible/Architecturally Significant	
079.-05-21.0	205	Columbia Ave	Eligible/Architecturally Significant	
079.-01-12.0	130	Columbia Ave & Charmouth	Eligible/Architecturally Significant	
047.-10-09.0	438	Columbus Ave	Local Protected Site or Local District	NR Listed
079.-01-02.0	1917	Colvin St W		NR Listed
052.-13-25.0	935	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-26.0	933	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-27.0	931	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-28.0	929	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-29.0	923-27	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-30.0	917	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-31.0	915	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-32.0	913	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-33.0	911	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-34.0	909	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-35.0	907	Comstock Ave	Local Protected Site or Local District	NR Listed

052.-13-36.0	905	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-37.0	903	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-15-13.0	953	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-15-14.0	951	Comstock Ave	Local Protected Site or Local District	NR Listed
046.-17-21.0	711	Comstock Ave		NR Eligible (SHPO)
052.-13-11.2	919	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-23.0	943	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-24.1	941	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-24.2	937	Comstock Ave	Local Protected Site or Local District	NR Listed
052.-13-22.0	945	Comstock Ave & Acorn Path	Local Protected Site or Local District	NR Listed
051.-01-01.0	940	Comstock Ave & Colvin St	Local Protected Site or Local District	NR Listed
052.-13-38.0	901	Comstock Ave & Stratford	Local Protected Site or Local District	NR Listed
052.-01-23.0	819	Comstock Ave To Ostrom Al		NR Listed
045.-17-22.0	109	Concord Pl	Eligible/Architecturally Significant	
045.-16-12.0	126	Concord Pl & Allen St		NR Eligible (SHPO)
093.-13-35.0	127	Coolidge Ave		NR Eligible (SHPO)
076.-19-05.0	235-5 1/2	Corning Ave W	Eligible/Architecturally Significant	
006.-18-05.0	712	Court St	Eligible/Architecturally Significant	
007.-10-02.0	512	Court St	Eligible/Architecturally Significant	
007.-12-05.0	314	Court St	Eligible/Architecturally Significant	
007.-06-12.0	409	Court St	Eligible/Architecturally Significant	
007.-10-01.0	502	Court St & Carbon St	Eligible/Architecturally Significant	
007.-06-11.0	413	Court St & Carbon St	Eligible/Architecturally Significant	
006.-18-01.1	700	Court St & First North St		NR Eligible (SHPO)
079.-10-18.0	412-14	Craddock St	Eligible/Architecturally Significant	
029.-08-01.0	200	Craton St & Winton St		NR Eligible (SHPO)
045.-05-03.1	104	Crawford Ave		NR Listed
045.-05-04.1	106	Crawford Ave		NR Listed
045.-05-05.0	108	Crawford Ave		NR Listed
045.-05-06.0	110	Crawford Ave		NR Listed
045.-05-07.0	200	Crawford Ave		NR Listed
045.-05-08.0	202	Crawford Ave		NR Listed
045.-05-09.0	204	Crawford Ave		NR Listed
045.-05-10.0	206	Crawford Ave		NR Listed
045.-05-11.0	208	Crawford Ave		NR Listed
045.-05-12.0	212	Crawford Ave		NR Listed
045.-05-13.0	220	Crawford Ave		NR Listed
045.-05-14.0	222	Crawford Ave		NR Listed
045.-06-11.0	119	Crawford Ave		NR Listed
045.-06-12.0	117	Crawford Ave		NR Listed
045.-06-13.0	115	Crawford Ave		NR Listed
045.-06-14.0	113	Crawford Ave		NR Listed
045.-06-15.0	111	Crawford Ave		NR Listed
045.-06-16.0	109	Crawford Ave		NR Listed
045.-06-17.0	107	Crawford Ave		NR Listed
045.-06-18.0	105	Crawford Ave		NR Listed
045.-06-19.0	103	Crawford Ave		NR Listed
045.-09-21.0	307	Crawford Ave		NR Listed
045.-09-22.0	305	Crawford Ave		NR Listed
045.-09-23.0	303	Crawford Ave		NR Listed
045.-09-24.0	301	Crawford Ave		NR Listed
045.-09-25.0	227	Crawford Ave		NR Listed
045.-09-26.0	225	Crawford Ave		NR Listed
045.-09-27.0	223	Crawford Ave		NR Listed
045.-09-28.0	221	Crawford Ave		NR Listed
045.-09-29.0	219	Crawford Ave		NR Listed
045.-09-30.0	217	Crawford Ave		NR Listed
045.-09-31.0	215	Crawford Ave		NR Listed
045.-09-32.0	213	Crawford Ave		NR Listed
045.-09-33.0	211	Crawford Ave		NR Listed
045.-09-34.0	207	Crawford Ave		NR Listed
045.-09-35.0	205	Crawford Ave		NR Listed
045.-09-36.0	203	Crawford Ave		NR Listed
045.-10-03.0	304	Crawford Ave		NR Listed

045.-10-04.0	306	Crawford Ave		NR Listed
045.-10-05.0	308	Crawford Ave		NR Listed
045.-10-06.0	310	Crawford Ave		NR Listed
045.-06-10.0	121	Crawford Ave & Scott Ave		NR Listed
045.-09-37.0	201	Crawford Ave & Scott Ave		NR Listed
045.-05-01.0	98	Crawford Ave & Scottholm		NR Listed
045.-05-15.0	224	Crawford Ave & Sunnyside		NR Listed
045.-10-01.0	300	Crawford Ave & Sunnyside		NR Listed
045.-05-02.1	100	Crawford Ave To Scottholm		NR Listed
045.-10-02.0	302	Crawford Ave To Sunnyside		NR Listed
082.-01-01.0	715	Crossett St	Eligible/Architecturally Significant	
082.-03-01.0	515	Crossett St	Eligible/Architecturally Significant	
082.-04-02.0	419	Crossett St	Eligible/Architecturally Significant	
082.-04-04.0	401	Crossett St	Eligible/Architecturally Significant	
082.-04-05.0	317	Crossett St	Eligible/Architecturally Significant	
087.-15-12.0	122	Crossett St	Eligible/Architecturally Significant	NR Listed
087.-15-13.0	130	Crossett St	Eligible/Architecturally Significant	NR Listed
087.-14-18.0	220	Crossett St		NR Listed
087.-14-19.0	224	Crossett St		NR Listed
087.-17-16.0	512	Crossett St	Eligible/Architecturally Significant	
087.-17-19.0	602	Crossett St	Eligible/Architecturally Significant	
087.-17-20.0	606-08	Crossett St	Eligible/Architecturally Significant	
087.-14-17.0	202	Crossett St & Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-14-20.0	228	Crossett St & Clairemont		NR Listed
049.-03-17.1	601-15	Crouse Ave S & Harrison S	Eligible/Architecturally Significant	NR Eligible (SHPO)
007.-10-14.0	707	Danforth St		NR Listed
007.-11-04.0	607	Danforth St	Eligible/Architecturally Significant	
007.-11-05.0	605	Danforth St	Eligible/Architecturally Significant	
007.-19-01.0	406	Danforth St		NR Eligible (SHPO)
007.-21-01.0	608	Danforth St		NR Eligible (SHPO)
007.-22-02.0	702	Danforth St		NR Eligible (SHPO)
007.-23-06.0	810-12	Danforth St	Eligible/Architecturally Significant	
007.-21-02.0	610	Danforth St & Carbon St	Eligible/Architecturally Significant	
007.-22-01.0	700	Danforth St & Carbon St		NR Eligible (SHPO)
007.-23-08.0	818-20	Danforth St & First North	Eligible/Architecturally Significant	
007.-20-07.0	518	Danforth St & Park St		NR Listed
006.-17-11.0	1001	Danforth St & Second Nort	Eligible/Architecturally Significant	
007.-22-03.0	714	Danforth St & Spring St	Eligible/Architecturally Significant	
007.-14-14.0	217-19	Danforth St & State St N	Eligible/Architecturally Significant	
092.-07-02.0	125-27	Davis St		NR Eligible (SHPO)
097.-14-26.0	228	Davis St	Eligible/Architecturally Significant	
086.-14-07.0	118	Dearborn Pl		NR Eligible (SHPO)
092.-10-26.0	222	Delaware St		NR Eligible (SHPO)
092.-11-05.0	305	Delaware St	Eligible/Architecturally Significant	
092.-11-12.0	139	Delaware St		NR Eligible (SHPO)
092.-05-17.0	515-17	Delaware St		NR Eligible (SHPO)
092.-05-22.0	423	Delaware St	Eligible/Architecturally Significant	
092.-11-01.0	341-43	Delaware St & Dudley St	Eligible/Architecturally Significant	NR Eligible (SHPO)
092.-11-16.1	101-17	Delaware St & Onondaga St		NR Eligible (SHPO)
019.-07-16.0	128	Dewitt St	Local Protected Site or Local District	
019.-03-23.0	162	Dewitt St	Local Protected Site or Local District	
019.-03-24.0	206	Dewitt St	Local Protected Site or Local District	
019.-03-35.1	232-36	Dewitt St	Local Protected Site or Local District	
019.-03-37.0	240	Dewitt St	Local Protected Site or Local District	
019.-03-38.0	308	Dewitt St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-03-39.0	310	Dewitt St	Local Protected Site or Local District	
019.-05-12.0	223	Dewitt St	Local Protected Site or Local District	NR Listed
019.-02-05.0	315-17	Dewitt St	Eligible/Architecturally Significant	
019.-06-13.0	143	Dewitt St	Local Protected Site or Local District	
019.-06-14.0	135	Dewitt St	Local Protected Site or Local District	
019.-03-40.0	330	Dewitt St & Farmer St	Local Protected Site or Local District	
013.-19-01.0	873	Dewitt St & Mertens Ave	Eligible/Architecturally Significant	
019.-02-06.0	301	Dewitt St & Park St	Local Protected Site or Local District	
008.-05-11.0	317	Division St E	Eligible/Architecturally Significant	

008.-11-03.0	316	Division St E		NR Eligible (SHPO)
118.-04-02.0	102	Division St W & Clinton S		NR Eligible (SHPO)
115.-16-06.0	238	Division St W & Solar St	Eligible/Architecturally Significant	
118.-03-06.0	238	Division St W & Solar St	Eligible/Architecturally Significant	
115.-15-02.0	102	Division W&clinton St N		NR Eligible (SHPO)
052.-11-28.0	104	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-29.0	108	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-30.0	110	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-31.0	112	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-32.0	114	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-33.0	116	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-34.0	118	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-35.0	120	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-36.0	122	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-37.0	124	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-38.0	126	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-39.0	128	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-12-11.0	117	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-12-12.0	113	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-12-13.0	109	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-12-14.0	107	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-12-15.0	105	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-12-16.0	103	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-12-17.0	101	Dorset Rd	Local Protected Site or Local District	NR Listed
052.-11-27.0	100	Dorset Rd & Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-11-40.0	130	Dorset Rd & Stratford St	Local Protected Site or Local District	NR Listed
052.-12-09.0	129	Dorset Rd & Stratford St	Local Protected Site or Local District	NR Listed
052.-12-10.0	119	Dorset Rd & Sumner Ave	Local Protected Site or Local District	NR Listed
016.-17-06.0	416	Douglas St	Eligible/Architecturally Significant	
014.-09-07.0	209	Durston Ave	Eligible/Architecturally Significant	
014.-09-21.0	147-49	Durston Ave	Eligible/Architecturally Significant	
014.-09-28.0	119	Durston Ave	Local Protected Site or Local District	
014.-11-24.0	128	Durston Ave	Local Protected Site or Local District	
014.-11-32.1	160	Durston Ave	Eligible/Architecturally Significant	
077.-05-18.0	209	Elk St		NR Eligible (SHPO)
092.-24-08.0	417	Elliott St	Eligible/Architecturally Significant	
092.-24-09.0	415	Elliott St	Eligible/Architecturally Significant	
092.-24-11.0	411	Elliott St	Eligible/Architecturally Significant	
092.-25-20.0	408	Elliott St	Eligible/Architecturally Significant	
092.-25-22.0	412	Elliott St	Eligible/Architecturally Significant	
092.-25-23.0	414	Elliott St	Eligible/Architecturally Significant	
092.-18-16.0	314	Elliott St	Eligible/Architecturally Significant	
092.-19-01.0	319	Elliott St	Eligible/Architecturally Significant	
092.-19-02.0	317	Elliott St	Eligible/Architecturally Significant	
092.-19-03.0	315	Elliott St	Eligible/Architecturally Significant	
092.-19-04.0	313	Elliott St	Eligible/Architecturally Significant	
092.-19-05.0	311	Elliott St	Eligible/Architecturally Significant	
092.-20-12.0	209	Elliott St	Eligible/Architecturally Significant	
092.-24-15.0	401	Elliott St & Geddes St S	Eligible/Architecturally Significant	
083.-14-15.0	115	Eloise Terr	Eligible/Architecturally Significant	
083.-14-16.0	113	Eloise Terr	Eligible/Architecturally Significant	
113.-01-08.0	1010	Emerson Ave	Eligible/Architecturally Significant	
111.-25-05.0	307	Emerson Ave & Hamilton St	Eligible/Architecturally Significant	
112.-08-14.0	710	Emerson Ave & Harbor St		NR Listed
030.-06-03.0	815	Erie Blvd E	Eligible/Architecturally Significant	
031.-08-01.1	1400	Erie Blvd E & Beech St S		NR Listed
103.-13-01.0	500	Erie Blvd E & Townsend St	Eligible/Architecturally Significant	
030.-14-03.1	740	Erie Blvd E To Water St E		NR Eligible (SHPO)
103.-15-03.0	330	Erie Blvd E To Water St E		NR Eligible (SHPO)
113.-01-01.0	1800	Erie Blvd W	Local Protected Site or Local District	
105.-11-03.1	538-64	Erie Blvd W & Leavenworth		NR Eligible (SHPO)
045.-15-24.0	913	Euclid Ave		NR Eligible (SHPO)
045.-15-25.0	911	Euclid Ave	Eligible/Architecturally Significant	
052.-06-13.0	758	Euclid Ave		NR Eligible (SHPO)

046.-12-11.0	609	Euclid Ave		NR Eligible (SHPO)
052.-06-01.0	700	Euclid Ave & Lancaster Av		NR Eligible (SHPO)
046.-14-10.0	423	Euclid Ave & Sumner Ave		NR Eligible (SHPO)
052.-07-04.0	822-26	Euclid Ave & Westcott St	Eligible/Architecturally Significant	
077.-01-24.0	132-34	Fage Ave		NR Eligible (SHPO)
014.-05-16.0	319	Farmer St	Local Protected Site or Local District	
014.-05-17.0	317	Farmer St	Local Protected Site or Local District	
014.-05-18.0	315	Farmer St	Local Protected Site or Local District	
014.-05-19.0	313	Farmer St	Local Protected Site or Local District	
014.-05-20.0	311	Farmer St	Local Protected Site or Local District	
014.-05-21.0	309	Farmer St	Local Protected Site or Local District	
014.-05-22.0	307	Farmer St	Local Protected Site or Local District	
014.-05-23.0	305	Farmer St	Local Protected Site or Local District	
014.-05-24.0	303	Farmer St	Local Protected Site or Local District	
019.-03-01.0	304	Farmer St	Local Protected Site or Local District	
019.-03-02.0	306	Farmer St	Local Protected Site or Local District	
019.-03-03.0	308	Farmer St	Local Protected Site or Local District	
019.-03-04.0	320	Farmer St	Local Protected Site or Local District	
019.-03-06.0	324	Farmer St	Local Protected Site or Local District	
019.-03-07.0	326	Farmer St	Local Protected Site or Local District	
019.-03-08.0	328	Farmer St	Local Protected Site or Local District	
019.-03-09.0	330	Farmer St	Local Protected Site or Local District	
019.-03-10.0	332	Farmer St	Local Protected Site or Local District	
014.-05-25.0	301	Farmer St & Dewitt St	Local Protected Site or Local District	
019.-03-05.1	322	Farmer St to Burlingame Rd	Local Protected Site or Local District	
037.-02-03.0	1918	Fayette St E		NR Eligible (SHPO)
047.-01-08.0	1318	Fayette St E		NR Eligible (SHPO)
030.-16-15.0	711	Fayette St E	Local Protected Site or Local District	
666.-01-17.0	403	Fayette St E		NR Eligible (SHPO)
102.-01-02.0	214-18	Fayette St E		NR Listed
048.-04-01.0	900-16	Fayette St E & Irving Ave		NR Eligible (SHPO)
102.-02-01.0	300-12	Fayette St E & Montgomery		NR Listed
103.-26-05.0	447	Fayette St E & Townsend S		NR Eligible (SHPO)
101.-03-04.0	321	Fayette St W		NR Listed
101.-03-05.0	317	Fayette St W		NR Listed
101.-03-06.0	313	Fayette St W		NR Listed
101.-03-07.0	311	Fayette St W		NR Listed
101.-04-03.0	229-37	Fayette St W		NR Listed
101.-05-03.0	115	Fayette St W		NR Listed
101.-04-06.0	201-13	Fayette St W & Clinton St		NR Listed
101.-05-01.1	121-29	Fayette St W & Clinton St		NR Listed
101.-03-08.0	301-07	Fayette St W & Franklin S		NR Listed
101.-04-01.0	247-59	Fayette St W & Franklin S		NR Listed
105.-13-21.0	1022-32	Fayette St W & Geddes St	Eligible/Architecturally Significant	
100.-02-03.0	801	Fayette St W & Oswego St	Eligible/Architecturally Significant	
112.-25-04.0	1970	Fayette St W & St Marks A	Eligible/Architecturally Significant	
112.-08-03.0	1965	Fayette St W & St Marks Ave	Eligible/Architecturally Significant	
101.-03-03.0	329	Fayette St W To Walton St		NR Listed
101.-04-02.0	239-45	Fayette St W To Walton St		NR Listed
101.-04-04.0	219-25	Fayette St W To Walton St		NR Listed
101.-04-05.0	215	Fayette St W To Walton St		NR Listed
037.-09-16.0	270	Fenway Dr	Eligible/Architecturally Significant	
037.-09-17.0	274	Fenway Dr	Eligible/Architecturally Significant	
037.-09-18.0	278	Fenway Dr	Eligible/Architecturally Significant	
037.-10-29.0	271	Fenway Dr	Eligible/Architecturally Significant	
077.-24-34.0	166-68	Fernwood Ave	Eligible/Architecturally Significant	
092.-11-35.0	136-38	Fitch St	Eligible/Architecturally Significant	
092.-04-19.0	219	Fitch St	Eligible/Architecturally Significant	
001.1-01-29.0	309	Fourth North St Rear	Eligible/Architecturally Significant	
118.-08-11.0/62	429	Franklin St N #101		NR Eligible (SHPO)
118.-07-08.0	432	Franklin St N To Clinton	Eligible/Architecturally Significant	
101.-03-09.0	308-10	Franklin St S		NR Listed
101.-04-15.0	309-15	Franklin St S		NR Listed
101.-15-05.0	402	Franklin St S & Jefferson		NR Listed

101.-04-14.0	317-21	Franklin St S & Walton St		NR Listed
085.-12-18.0	133-37	Furman St		NR Eligible (SHPO)
085.-13-20.1	132-44	Furman St	Eligible/Architecturally Significant	NR Eligible (SHPO)
085.-12-05.0	251	Furman St	Eligible/Architecturally Significant	
084.-09-15.0	244	Garfield Ave		NR Eligible (SHPO)
105.-01-46.0	306	Geddes St N	Eligible/Architecturally Significant	
082.-08-51.0	2105	Geddes St S	Eligible/Architecturally Significant	
082.-01-26.0	2027	Geddes St S	Eligible/Architecturally Significant	
080.-04-04.0	2206	Geddes St S	Eligible/Architecturally Significant	
080.-05-15.0	2217	Geddes St S		NR Listed
080.-05-16.0	2215	Geddes St S		NR Listed
080.-05-17.0	2213	Geddes St S		NR Listed
080.-05-18.0	2211	Geddes St S		NR Listed
080.-05-19.0	2209	Geddes St S		NR Listed
080.-05-20.0	2207	Geddes St S		NR Listed
080.-05-21.0	2205	Geddes St S		NR Listed
080.-05-22.0	2203	Geddes St S		NR Listed
087.-01-11.0	1505	Geddes St S	Eligible/Architecturally Significant	
082.-08-27.0	2155	Geddes St S		NR Listed
082.-08-28.0	2153	Geddes St S		NR Listed
082.-08-29.0	2151	Geddes St S		NR Listed
082.-08-30.0	2149	Geddes St S		NR Listed
082.-08-31.0	2147	Geddes St S		NR Listed
082.-08-32.0	2145	Geddes St S		NR Listed
082.-08-33.0	2143	Geddes St S		NR Listed
082.-08-34.0	2141	Geddes St S		NR Listed
082.-08-35.0	2139	Geddes St S		NR Listed
082.-08-36.0	2137	Geddes St S		NR Listed
082.-08-37.0	2135	Geddes St S		NR Listed
092.-27-42.0	1074	Geddes St S	Eligible/Architecturally Significant	
092.-24-17.0	1310	Geddes St S	Eligible/Architecturally Significant	
092.-25-16.0	1210	Geddes St S	Eligible/Architecturally Significant	
088.-10-10.0	1606	Geddes St S	Eligible/Architecturally Significant	
081.-04-13.0	2156	Geddes St S	Eligible/Architecturally Significant	
092.-18-18.0	1213	Geddes St S	Eligible/Architecturally Significant	
088.-09-07.0	1500	Geddes St S & Bellevue Av		NR Eligible (SHPO)
082.-01-32.0	2001	Geddes St S & Crossett St	Eligible/Architecturally Significant	
087.-18-12.0	1911	Geddes St S & Crossett St	Eligible/Architecturally Significant	
092.-03-09.0	940	Geddes St S & Delaware St	Eligible/Architecturally Significant	
092.-18-17.0	1215	Geddes St S & Elliott St	Eligible/Architecturally Significant	
099.-03-04.0	200-06	Geddes St S & Fayette St		NR Eligible (SHPO)
097.-01-98.0	501-09	Geddes St S & Gifford St		NR Eligible (SHPO)
099.-03-05.0	208-18	Geddes St S To Fayette T	Eligible/Architecturally Significant	
118.-05-02.1	311	Genant Dr To Clinton St N	Eligible/Architecturally Significant	NR Eligible (SHPO)
048.-11-02.0	1104	Genesee St E	Local Protected Site or Local District	
037.-04-22.0	2111	Genesee St E	Eligible/Architecturally Significant	
037.-04-26.0	2017	Genesee St E		NR Eligible (SHPO)
047.-15-09.0	1540	Genesee St E		NR Eligible (SHPO)
047.-17-04.0	1406-08	Genesee St E		NR Eligible (SHPO)
047.-17-08.0	1436-38	Genesee St E		NR Eligible (SHPO)
037.-16-07.0	2654	Genesee St E		NR Listed
037.-07-18.0	2515	Genesee St E	Eligible/Architecturally Significant	
037.-12-15.0	2669	Genesee St E		NR Listed
047.-07-03.0	1920	Genesee St E	Eligible/Architecturally Significant	
048.-05-04.0	1027-29	Genesee St E	Eligible/Architecturally Significant	
102.-06-04.0	600	Genesee St E	Eligible/Architecturally Significant	
103.-17-07.0	225	Genesee St E		NR Listed
048.-05-04.1	1027-29	Genesee St E	Eligible/Architecturally Significant	
104.-24-01.0	118	Genesee St E	Local Protected Site or Local District	NR Listed
104.-24-02.0	122-26	Genesee St E	Local Protected Site or Local District	NR Listed
104.-24-03.0	128	Genesee St E	Local Protected Site or Local District	NR Listed
104.-24-04.0	132	Genesee St E	Local Protected Site or Local District	NR Listed
037.-21-02.0	2118	Genesee St E & Allen St	Eligible/Architecturally Significant	
037.-05-21.0	2201	Genesee St E & Allen St		NR Listed

047.-01-15.2	1455-57	Genesee St E & Beech St S		NR Eligible (SHPO)
047.-02-20.0	1505	Genesee St E & Beech St S	Eligible/Architecturally Significant	
037.-21-01.0	2100	Genesee St E & Cambridge	Eligible/Architecturally Significant	
047.-03-04.0	1641	Genesee St E & Cherry St	Eligible/Architecturally Significant	
047.-10-03.0	1828	Genesee St E & Columbus A	Eligible/Architecturally Significant	
047.-06-19.0	1901	Genesee St E & Columbus A		NR Eligible (SHPO)
047.-07-01.0	1900	Genesee St E & Columbus A	Eligible/Architecturally Significant	
048.-04-06.0	941-49	Genesee St E & Crouse Ave	Eligible/Architecturally Significant	
048.-15-03.0	728	Genesee St E & Forman Ave	Eligible/Architecturally Significant	
102.-05-01.0	601	Genesee St E & Mcbride St	Eligible/Architecturally Significant	NR Eligible (SHPO)
103.-17-06.0	237-43	Genesee St E & Montgomery		NR Listed
037.-16-01.0	2600	Genesee St E & Scottholm		NR Eligible (SHPO)
048.-05-02.0	1073-85	Genesee St E & University	Eligible/Architecturally Significant	
048.-11-06.0	1124	Genesee St E & Walnut Ave	Eligible/Architecturally Significant	
103.-17-08.0	201-19	Genesee St E & Warren St	Eligible/Architecturally Significant	NR Listed
103.-29-01.0	200	Genesee St E & Warren St	Local Protected Site or Local District	NR Listed
104.-24-07.0	140	Genesee St E & Warren St	Local Protected Site or Local District	NR Listed
037.-22-01.1/3	2004	Genesee St E & Westcott	Local Protected Site or Local District	NR Listed
037.-22-01.0	2004	Genesee St E & Westcott S	Local Protected Site or Local District	NR Listed
037.-22-01.1/1	2004	Genesee St E & Westcott S	Local Protected Site or Local District	NR Listed
037.-22-01.1/4	2004	Genesee St E & Westcott St	Local Protected Site or Local District	NR Listed
037.-05-14.0	2323-25	Genesee St E & Westmorela	Eligible/Architecturally Significant	
037.-05-20.0	2205	Genesee St E To Allen St		NR Listed
102.-04-02.0	555	Genesee St E To Fayette S	Eligible/Architecturally Significant	
102.-08-03.0	430	Genesee St E To Mccarthy	Eligible/Architecturally Significant	
048.-01-06.0	719	Genesee St E To Orange Al		NR Eligible (SHPO)
037.-12-20.0	2627	Genesee St E To Salt Spri		NR Listed
048.-03-06.0	805-09	Genesee St E To Wellingto	Eligible/Architecturally Significant	
037.-22-01.1/2	2004	Genesee St E& Westcott	Local Protected Site or Local District	NR Listed
111.-02-13.0	1806	Genesee St W	Eligible/Architecturally Significant	
111.-02-14.0	1810	Genesee St W	Eligible/Architecturally Significant	
111.-12-03.0	1605	Genesee St W	Eligible/Architecturally Significant	
111.-12-04.0	1603	Genesee St W	Eligible/Architecturally Significant	
111.-02-17.0	1818	Genesee St W & Avery Ave	Eligible/Architecturally Significant	
108.2-04-20.0	1072-74	Genesee St W & Liberty St		NR Eligible (SHPO)
111.-03-11.0	1700	Genesee St W & Milton Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
104.-01-03.0	400	Genesee St W & Wallace St		NR Eligible (SHPO)
111.-15-07.0	1801	Genesee St W & Willis Ave	Eligible/Architecturally Significant	
106.-06-04.0	620	Genesee St W To Belden Av	Eligible/Architecturally Significant	
104.-13-08.0	226-30	Genesee St W To Clinton S		NR Eligible (SHPO)
104.-12-01.0	308	Genesee St W To Willow St	Eligible/Architecturally Significant	
018.-09-14.0	133	Gertrude St		NR Listed
018.-09-15.0	129	Gertrude St		NR Listed
018.-09-16.0	127	Gertrude St		NR Listed
018.-09-17.0	125	Gertrude St	Local Protected Site or Local District	NR Listed
018.-09-18.0	123	Gertrude St		NR Listed
018.-09-19.0	121	Gertrude St		NR Listed
018.-09-20.0	117	Gertrude St	Eligible/Architecturally Significant	NR Listed
018.-09-21.0	113	Gertrude St		NR Listed
018.-09-22.0	111	Gertrude St		NR Listed
018.-09-23.0	109	Gertrude St		NR Listed
018.-09-24.0	107	Gertrude St		NR Listed
018.-09-25.0	105	Gertrude St		NR Listed
018.-04-09.0	334	Gertrude St	Eligible/Architecturally Significant	
018.-08-01.0	110	Gertrude St		NR Listed
018.-08-02.0	114-16	Gertrude St		NR Listed
018.-08-03.1	116 1/2	Gertrude St		NR Listed
018.-08-03.2	118	Gertrude St		NR Listed
018.-08-05.1	122	Gertrude St		NR Listed
018.-08-06.0	124	Gertrude St		NR Listed
018.-08-07.0	126	Gertrude St		NR Listed
018.-08-08.0	128	Gertrude St		NR Listed
018.-08-09.0	130	Gertrude St		NR Listed
018.-08-10.0	132	Gertrude St		NR Listed

018.-08-11.0	134	Gertrude St		NR Listed
018.-09-26.0	101-03	Gertrude St & Howard St		NR Listed
018.-09-13.0	135-39	Gertrude St & Lodi St		NR Listed
018.-09-31.0	127	Gertrude St Rear		NR Listed
096.-01-02.0	333	Gifford St		NR Eligible (SHPO)
096.-01-03.0	331	Gifford St		NR Eligible (SHPO)
096.-01-03.1	331	Gifford St		NR Eligible (SHPO)
097.-01-42.0	517	Gifford St		NR Eligible (SHPO)
097.-02-12.0	421	Gifford St	Eligible/Architecturally Significant	
100.-23-31.0	524	Gifford St	Eligible/Architecturally Significant	
100.-24-14.1	428	Gifford St To Fabius St		NR Eligible (SHPO)
100.-24-15.0	432	Gifford St To Fabius St	Eligible/Architecturally Significant	NR Eligible (SHPO)
100.-24-16.0	434	Gifford St To Fabius St	Eligible/Architecturally Significant	
080.-06-08.0	814	Glenwood Ave		NR Listed
080.-06-09.0	818	Glenwood Ave		NR Listed
080.-11-48.0	625	Glenwood Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-11-49.0	619	Glenwood Ave		NR Eligible (SHPO)
080.-11-50.0	615	Glenwood Ave		NR Eligible (SHPO)
080.-11-51.0	611	Glenwood Ave		NR Eligible (SHPO)
080.-11-52.0	607	Glenwood Ave		NR Eligible (SHPO)
079.-04-11.0	510	Glenwood Ave	Eligible/Architecturally Significant	
079.-04-12.0	514	Glenwood Ave		NR Listed
079.-04-13.0	516	Glenwood Ave		NR Listed
079.-22-02.0	521	Glenwood Ave		NR Eligible (SHPO)
079.-22-03.0	517	Glenwood Ave		NR Eligible (SHPO)
080.-09-09.0	604	Glenwood Ave		NR Listed
080.-09-10.0	608	Glenwood Ave		NR Listed
080.-09-11.0	612	Glenwood Ave		NR Listed
080.-09-12.0	616	Glenwood Ave		NR Listed
080.-10-09.0	714	Glenwood Ave		NR Listed
080.-10-10.0	718	Glenwood Ave		NR Listed
080.-11-16.0	713	Glenwood Ave		NR Eligible (SHPO)
080.-11-17.0	705	Glenwood Ave		NR Eligible (SHPO)
079.-05-09.0	400	Glenwood Ave & Arlington	Eligible/Architecturally Significant	
080.-11-18.0	701-03	Glenwood Ave & Robineau R		NR Eligible (SHPO)
080.-10-11.0	722	Glenwood Ave & Stinard Av		NR Listed
080.-06-10.0	822	Glenwood Ave & Strathmore		NR Listed
079.-04-14.0	520	Glenwood Ave & Wellesley		NR Listed
079.-22-01.0	525	Glenwood Ave & Wellesley	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-11-53.0	601	Glenwood Ave & Wellesley Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
087.-16-03.0	117-19	Gordon Ave	Eligible/Architecturally Significant	
087.-17-05.0	225	Gordon Ave	Eligible/Architecturally Significant	
087.-11-15.0	222-24	Gordon Ave	Eligible/Architecturally Significant	
087.-12-12.0	118-20	Gordon Ave	Eligible/Architecturally Significant	
087.-18-03.0	311	Gordon Ave	Eligible/Architecturally Significant	
087.-16-01.0	129-31	Gordon Ave & Roberts Ave	Eligible/Architecturally Significant	
087.-18-05.0	303	Gordon Ave & Stinard Ave	Eligible/Architecturally Significant	
097.-10-14.0	111-13	Grace St		NR Eligible (SHPO)
097.-11-20.0	130-32	Grace St	Eligible/Architecturally Significant	
097.-11-21.0	136-38	Grace St	Eligible/Architecturally Significant	
087.-02-13.0	108	Grant Ave	Eligible/Architecturally Significant	
087.-02-14.0	112-14	Grant Ave	Eligible/Architecturally Significant	
087.-02-15.0	118	Grant Ave	Eligible/Architecturally Significant	
006.-02-11.0	2717-19	Grant Blvd	Eligible/Architecturally Significant	
016.-12-33.0	305	Graves St	Eligible/Architecturally Significant	
018.-09-01.2	204	Green St		NR Listed
018.-09-02.0	206	Green St		NR Listed
018.-09-03.0	208	Green St		NR Listed
018.-09-04.0	210	Green St		NR Listed
018.-09-05.0	212	Green St		NR Listed
018.-09-06.0	214	Green St		NR Listed
018.-09-07.0	218	Green St		NR Listed
018.-09-08.0	220	Green St	Local Protected Site or Local District	NR Listed
018.-10-12.0	219	Green St		NR Listed

018.-10-13.0	217	Green St		NR Listed
018.-10-14.0	215	Green St	Local Protected Site or Local District	NR Listed
018.-10-15.0	213	Green St		NR Listed
018.-10-16.0	211	Green St		NR Listed
018.-10-17.0	209	Green St		NR Listed
018.-10-18.0	207	Green St		NR Listed
018.-10-19.0	203	Green St		NR Listed
018.-11-24.0	131	Green St		NR Listed
018.-11-25.0	129	Green St		NR Listed
018.-11-26.0	127	Green St		NR Listed
018.-11-28.0	121	Green St		NR Listed
018.-11-29.0	117	Green St		NR Listed
018.-11-30.0	115	Green St		NR Listed
018.-11-31.0	113	Green St		NR Listed
018.-12-01.0	122	Green St		NR Listed
018.-12-02.0	124	Green St		NR Listed
018.-12-03.0	126	Green St		NR Listed
018.-12-04.0	128	Green St		NR Listed
018.-12-05.0	130	Green St		NR Listed
018.-02-09.1	323	Green St	Eligible/Architecturally Significant	
018.-11-33.0	103-07	Green St & Catherine St		NR Listed
018.-09-01.1	200	Green St & Howard St		NR Listed
018.-10-20.0	201	Green St & Howard St		NR Listed
018.-11-23.0	133-35	Green St & Howard St		NR Listed
018.-12-06.0	134	Green St & Howard St		NR Listed
018.-11-23.1	133-35	Green St & Howard St		NR Listed
018.-09-09.0	222	Green St & Lodi St		NR Listed
111.-21-21.0	522	Hamilton St	Eligible/Architecturally Significant	
111.-24-03.0	303-05	Hamilton St	Eligible/Architecturally Significant	
014.-06-03.0	115	Hampshire Rd	Local Protected Site or Local District	
014.-06-04.0	113	Hampshire Rd	Local Protected Site or Local District	
014.-06-05.0	109	Hampshire Rd	Local Protected Site or Local District	
014.-06-06.1	107	Hampshire Rd	Local Protected Site or Local District	
014.-06-07.1	103	Hampshire Rd	Local Protected Site or Local District	
014.-06-08.0	101	Hampshire Rd	Local Protected Site or Local District	
014.-07-15.0	102	Hampshire Rd	Local Protected Site or Local District	
014.-07-16.0	104	Hampshire Rd	Local Protected Site or Local District	
014.-07-17.0	106	Hampshire Rd	Local Protected Site or Local District	
014.-07-18.0	108	Hampshire Rd	Local Protected Site or Local District	
014.-07-19.0	110	Hampshire Rd	Local Protected Site or Local District	
014.-07-20.0	112	Hampshire Rd	Local Protected Site or Local District	
014.-07-21.0	118	Hampshire Rd & Rugby Rd	Local Protected Site or Local District	
081.-03-08.0	110	Hancock Dr	Eligible/Architecturally Significant	
081.-03-14.0	122	Hancock Dr To Glenwood Av	Eligible/Architecturally Significant	
011.-12-32.0	121-23	Harold St	Eligible/Architecturally Significant	
095.-02-01.0	218-30	Harrison St & Harrison Pl	Eligible/Architecturally Significant	
018.-08-29.0	407-09	Hawley Ave		NR Listed
030.-01-02.0	302	Hawley Ave		NR Listed
030.-01-03.0	304	Hawley Ave		NR Listed
030.-01-04.0	306	Hawley Ave	Local Protected Site or Local District	NR Listed
030.-01-05.0	308	Hawley Ave		NR Listed
030.-01-06.0	312	Hawley Ave		NR Listed
030.-01-07.0	314	Hawley Ave		NR Listed
030.-01-08.0	316	Hawley Ave		NR Listed
030.-01-09.0	318	Hawley Ave		NR Listed
030.-01-10.0	320	Hawley Ave		NR Listed
030.-01-11.0	322	Hawley Ave		NR Listed
030.-01-12.0	326	Hawley Ave		NR Listed
030.-01-13.0	330	Hawley Ave		NR Listed
030.-02-02.0	402	Hawley Ave		NR Listed
030.-02-03.0	404	Hawley Ave		NR Listed
030.-02-04.0	406	Hawley Ave		NR Listed
030.-02-05.0	408	Hawley Ave		NR Eligible (SHPO)
030.-02-08.0	414	Hawley Ave		NR Listed

030.-02-09.0	418	Hawley Ave		NR Listed
030.-02-10.0	420	Hawley Ave		NR Listed
030.-02-11.1	422	Hawley Ave		NR Listed
030.-02-13.1	426	Hawley Ave		NR Listed
030.-02-14.0	428	Hawley Ave		NR Listed
030.-02-15.0	430-32	Hawley Ave		NR Listed
030.-02-16.0	436-38	Hawley Ave		NR Listed
030.-02-17.0	440	Hawley Ave		NR Listed
030.-02-18.0	442	Hawley Ave		NR Listed
030.-02-19.0	444	Hawley Ave		NR Listed
030.-03-02.2	508	Hawley Ave		NR Listed
030.-03-03.1	510	Hawley Ave		NR Listed
030.-03-05.0	514	Hawley Ave		NR Listed
030.-03-06.0	516	Hawley Ave		NR Listed
030.-03-07.0	518	Hawley Ave		NR Listed
030.-03-08.0	520	Hawley Ave		NR Eligible (SHPO)
018.-12-09.0	321	Hawley Ave		NR Listed
018.-12-10.0	319	Hawley Ave		NR Listed
018.-12-11.0	317	Hawley Ave		NR Listed
018.-12-12.0	315	Hawley Ave		NR Listed
018.-12-13.0	313	Hawley Ave		NR Listed
018.-07-06.0	511	Hawley Ave		NR Listed
018.-07-07.0	509	Hawley Ave		NR Listed
018.-07-08.0	507	Hawley Ave		NR Listed
018.-07-09.0	505	Hawley Ave		NR Listed
018.-08-18.0	439-45	Hawley Ave		NR Listed
018.-08-19.0	433	Hawley Ave		NR Listed
018.-08-20.0	431	Hawley Ave		NR Listed
018.-08-21.0	429	Hawley Ave		NR Listed
018.-08-22.0	427	Hawley Ave		NR Listed
018.-08-23.0	423-25	Hawley Ave		NR Listed
018.-08-24.0	421	Hawley Ave		NR Listed
018.-08-25.0	419	Hawley Ave		NR Listed
018.-08-26.0	415-17	Hawley Ave		NR Listed
018.-08-27.0	413	Hawley Ave		NR Listed
018.-08-28.0	411	Hawley Ave		NR Listed
103.-06-02.0	206	Hawley Ave		NR Listed
103.-06-03.0	210	Hawley Ave		NR Listed
103.-06-04.0	214-16	Hawley Ave		NR Listed
103.-06-05.0	218	Hawley Ave		NR Listed
103.-06-06.0	220	Hawley Ave		NR Listed
103.-06-07.0	222-24	Hawley Ave		NR Listed
030.-02-07.1	412	Hawley Ave		NR Listed
030.-02-05.1	408	Hawley Ave		NR Listed
030.-01-01.0	300	Hawley Ave & Catherine St		NR Listed
103.-05-09.0	227-31	Hawley Ave & Catherine St		NR Listed
103.-06-08.0	226	Hawley Ave & Catherine St		NR Listed
030.-02-20.0	448-50	Hawley Ave & Crouse Ave N		NR Listed
030.-03-01.0	500	Hawley Ave & Crouse Ave N		NR Listed
018.-07-10.0	501	Hawley Ave & Crouse Ave N		NR Listed
018.-08-17.0	449	Hawley Ave & Crouse Ave N		NR Listed
018.-08-30.0	405	Hawley Ave & Gertrude St	Eligible/Architecturally Significant	NR Listed
018.-12-14.0	309	Hawley Ave & Green St		NR Listed
030.-01-14.0	332	Hawley Ave & Howard St		NR Listed
030.-02-01.0	400	Hawley Ave & Howard St		NR Listed
018.-12-08.0	323-31	Hawley Ave & Howard St		NR Listed
030.-03-09.0	524	Hawley Ave & Lodi St		NR Listed
018.-07-05.0	515	Hawley Ave & Lodi St		NR Listed
103.-06-01.0	200-04	Hawley Ave & Mcbride St N		NR Listed
030.-03-02.3	508	Hawley Ave Rear		NR Listed
047.-10-14.0	109	Hawthorne St		NR Eligible (SHPO)
112.-19-20.0	128	Hayden Ave	Eligible/Architecturally Significant	
104.-02-02.0	212	Herald Pl & Franklin St N		NR Eligible (SHPO)
104.-02-02.1	212	Herald Pl & Franklin St N		NR Listed

104.-09-01.0	221-23	Herald Pl & Franklin St N	Eligible/Architecturally Significant	
001.2-02-03.0	617	Hiawatha Blvd E & Second	Eligible/Architecturally Significant	
017.-07-35.0	603	Hickory St	Eligible/Architecturally Significant	
016.-21-01.0	710	Hickory St	Eligible/Architecturally Significant	
016.-05-24.0	709	Hickory St	Eligible/Architecturally Significant	
019.-05-14.0	323	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-15.0	321	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-16.0	319	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-17.0	317	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-18.0	315	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-19.0	313	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-20.0	307	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-21.0	305	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-22.0	303	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-01.0	306	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-02.0	308	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-03.0	310	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-04.0	312	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-05.0	314	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-06.0	316	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-07.0	318	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-08.0	320	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-09.0	322	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-10.0	324	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-17-17.0	215	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-17-18.0	213	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-17-19.0	209	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-17-20.0	207	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-17-21.0	205	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-18-08.0	210	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-18-09.0	212	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-18-10.0	214	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
016.-18-11.0	216	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-11.0	326	Highland Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-06-12.0	328	Highland Ave & Dewitt St	Local Protected Site or Local District	NR Eligible (SHPO)
016.-17-22.0	203	Highland Ave & Graves St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-05-23.0	301	Highland Ave & Oak St	Local Protected Site or Local District	NR Eligible (SHPO)
016.-17-16.0	217	Highland Ave & Oak St	Local Protected Site or Local District	NR Eligible (SHPO)
016.-18-26.0	110	Highland St		NR Listed
016.-16-26.2	300	Highland St & Highland Av		NR Eligible (SHPO)
079.-09-22.0	318	Hillview Ave	Eligible/Architecturally Significant	
079.-10-09.0	329	Hillview Ave	Eligible/Architecturally Significant	
091.-14-17.0	400	Hoefler St	Eligible/Architecturally Significant	
093.-01-12.0	277	Holland St		NR Eligible (SHPO)
093.-02-02.0	237-39	Holland St		NR Eligible (SHPO)
092.-10-17.0	320-22	Holland St	Eligible/Architecturally Significant	NR Eligible (SHPO)
097.-08-19.0	118	Holland St		NR Eligible (SHPO)
097.-09-21.1	218-20	Holland St		NR Eligible (SHPO)
097.-09-25.0	236-38	Holland St		NR Eligible (SHPO)
093.-02-20.0	123-25	Holland St		NR Eligible (SHPO)
097.-09-18.0	202	Holland St & Congress Ave		NR Eligible (SHPO)
018.-10-21.0	410-16	Howard St		NR Listed
018.-11-15.0	415	Howard St		NR Listed
018.-11-16.0	413	Howard St		NR Listed
018.-11-17.0	411	Howard St		NR Listed
018.-11-18.0	409	Howard St		NR Listed
018.-11-19.0	407	Howard St		NR Listed
018.-11-20.0	405	Howard St		NR Listed
018.-11-21.0	403	Howard St		NR Listed
018.-11-22.0	401	Howard St		NR Listed
018.-10-22.0	418	Howard St & Wayne St	Local Protected Site or Local District	NR Listed
018.-11-14.0	417	Howard St & Wayne St		NR Listed
087.-16-08.0	414-16	Hubbell Ave	Eligible/Architecturally Significant	
087.-16-09.0	420-22	Hubbell Ave	Eligible/Architecturally Significant	

087.-16-10.0	426	Hubbell Ave	Eligible/Architecturally Significant	
087.-16-11.0	428	Hubbell Ave	Eligible/Architecturally Significant	
087.-13-24.0	411	Hubbell Ave	Eligible/Architecturally Significant	
087.-13-26.0	401	Hubbell Ave	Eligible/Architecturally Significant	
087.-13-28.0	327-29	Hubbell Ave	Eligible/Architecturally Significant	
087.-13-29.0	323-25	Hubbell Ave	Eligible/Architecturally Significant	
087.-13-30.0	319-21	Hubbell Ave	Eligible/Architecturally Significant	
087.-16-12.0	430-32	Hubbell Ave & Crossett St	Eligible/Architecturally Significant	
087.-13-19.0	439	Hubbell Ave & Crossett St	Eligible/Architecturally Significant	
086.-07-09.0	114	Huron St		NR Eligible (SHPO)
049.-02-03.0	601	Irving Ave & Harrison St	Eligible/Architecturally Significant	
019.-07-13.0	1215-29	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-07-14.0	1111-29	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-09-03.0/1	1214	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-09-03.0/2	1216	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-09-03.0/3	1218	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-09-03.0/4	1220	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-10-02.0	1402	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-10-03.0	1416	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-10-04.0	1420	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-10-05.0	1428	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-10-06.0	1500	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-10-07.0	1504	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-10-08.0	1508	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-02.0	1610	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-03.0	1618	James St	Local Protected Site or Local District	NR Eligible (SHPO)
014.-09-30.1	1419-25	James St	Local Protected Site or Local District	NR Eligible (SHPO)
014.-09-32.0	1401	James St	Local Protected Site or Local District	NR Eligible (SHPO)
014.-09-33.0	1305	James St	Local Protected Site or Local District	NR Eligible (SHPO)
014.-09-34.0	1303	James St	Local Protected Site or Local District	NR Eligible (SHPO)
017.-21-08.0	457	James St	Eligible/Architecturally Significant	
017.-21-10.0	437	James St	Local Protected Site or Local District	
014.-12-18.0	1681	James St	Local Protected Site or Local District	NR Eligible (SHPO)
025.-04-02.1	3606	James St		NR Eligible (SHPO)
025.-05-05.0	3522	James St		NR Eligible (SHPO)
019.-11-12.0	1636	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-13.0	1646	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-14.0	1650	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-15.0	1658	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-16.0	1660	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-17.0	1662	James St	Local Protected Site or Local District	NR Eligible (SHPO)
103.-05-04.0	622	James St	Eligible/Architecturally Significant	
019.-09-03.1	1214	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-09-03.2	1216	James St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-09-03.4	1220	James St	Local Protected Site or Local District	NR Eligible (SHPO)
103.-03-01.0	408-22	James St & Burnet Ave		NR Eligible (SHPO)
019.-07-15.0	1101	James St & Dewitt St	Local Protected Site or Local District	
014.-09-29.0	1429	James St & Durston Ave	Local Protected Site or Local District	NR Eligible (SHPO)
014.-11-22.0	1507	James St & Durston Ave	Local Protected Site or Local District	NR Eligible (SHPO)
014.-11-21.0	1609-47	James St & Hampton Rd	Local Protected Site or Local District	NR Eligible (SHPO)
020.-02-01.0	1802	James St & Hixson Ave		NR Eligible (SHPO)
024.-10-02.1	3312	James St & Plymouth Dr		NR Eligible (SHPO)
019.-09-01.0	1204	James St & Sedgwick St &	Local Protected Site or Local District	NR Eligible (SHPO)
020.-07-03.0	2378-90	James St & Stafford Ave	Eligible/Architecturally Significant	
017.-22-03.0	323-35	James St & State St N	Eligible/Architecturally Significant	
014.-12-17.0	1683	James St & Teall Ave	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-18.0	1666	James St & Teall Ave	Local Protected Site or Local District	NR Eligible (SHPO)
017.-20-08.0	501-19	James St & Townsend St N	Eligible/Architecturally Significant	NR Listed
103.-03-06.0	480	James St & Townsend St N		NR Eligible (SHPO)
019.-10-01.1	1400	James St & Vine St & Doro	Local Protected Site or Local District	NR Eligible (SHPO)
019.-10-09.0	1512	James St & Wilson St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-11-01.0	1600	James St & Wilson St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-09-03.0/14	1234	James St Condo Eight	Local Protected Site or Local District	NR Eligible (SHPO)
014.-11-23.0	1601	James St Rear	Local Protected Site or Local District	NR Eligible (SHPO)

019.-09-02.0	1208	James St To Dorothy St	Local Protected Site or Local District	NR Eligible (SHPO)
024.-08-13.1	3127-31	James St To Tyson Pl	Eligible/Architecturally Significant	
016.-20-06.0	723	James St To Willow St E	Local Protected Site or Local District	
017.-19-05.0	615	James St To Willow St E	Eligible/Architecturally Significant	
102.-01-08.0	205-09	Jefferson St E		NR Eligible (SHPO)
101.-07-06.0	125	Jefferson St E & Warren St S		NR non-contributing
101.-12-03.1	225	Jefferson St W		NR Listed
101.-13-01.0	200	Jefferson St W		NR Listed
101.-17-03.0	345	Jefferson St W	Eligible/Architecturally Significant	
101.-17-04.0	343	Jefferson St W	Eligible/Architecturally Significant	
101.-05-14.3/1	108	Jefferson St W #601		NR Listed
092.-09-13.0	302	Kellogg St		NR Eligible (SHPO)
092.-10-01.0	321	Kellogg St	Eligible/Architecturally Significant	
092.-10-10.0	303	Kellogg St		NR Eligible (SHPO)
097.-10-24.0	212	Kellogg St		NR Eligible (SHPO)
097.-08-01.0	121	Kellogg St & Congress Ave		NR Eligible (SHPO)
092.-09-12.0	300	Kellogg St & Massena St		NR Eligible (SHPO)
084.-03-04.0	108	Kennedy St E	Eligible/Architecturally Significant	
084.-03-05.0	116	Kennedy St E		NR Eligible (SHPO)
085.-10-26.0	215	Kennedy St E		NR Eligible (SHPO)
084.-02-07.0	111	Kennedy St W		NR Listed
085.-12-25.0	108	Kennedy St W	Eligible/Architecturally Significant	
007.-17-15.0	211	Kirkpatrick St	Eligible/Architecturally Significant	
007.-19-12.0	309	Kirkpatrick St		NR Eligible (SHPO)
007.-19-13.0	307	Kirkpatrick St	Eligible/Architecturally Significant	
088.-14-03.0	309	La Forte Ave	Eligible/Architecturally Significant	
075.-06-09.1	423-25	Lafayette Ave W	Eligible/Architecturally Significant	
075.-06-11.0	411	Lafayette Ave W	Eligible/Architecturally Significant	
076.-01-08.0	241	Lafayette Ave W To Cornin	Eligible/Architecturally Significant	
052.-06-40.0	871	Lancaster Ave	Eligible/Architecturally Significant	
052.-06-42.0	863	Lancaster Ave		NR Eligible (SHPO)
052.-06-44.0	855	Lancaster Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
052.-06-51.0	827	Lancaster Ave		NR Listed
046.-12-01.0	700	Lancaster Ave & Clarendon		NR Eligible (SHPO)
052.-10-01.0	900	Lancaster Ave & Stratford	Eligible/Architecturally Significant	
084.-22-22.0	403	Landon Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
106.-12-14.0	200	Leavenworth Ave & Park Av	Eligible/Architecturally Significant	NR Eligible (SHPO)
118.-01-07.0	400-20	Leavenworth Ave To Maltbi		NR Eligible (SHPO)
003.-14-04.0	718	Lemoyne Ave	Eligible/Architecturally Significant	
003.-18-05.1	1134	Lemoyne Ave	Eligible/Architecturally Significant	
047.-05-17.0	207	Lexington Ave	Eligible/Architecturally Significant	
093.-06-35.0	115	Lincoln Ave		NR Eligible (SHPO)
093.-05-06.0	122	Lincoln Ave	Eligible/Architecturally Significant	
093.-05-13.0	156	Lincoln Ave	Eligible/Architecturally Significant	
093.-06-36.0	109	Lincoln Ave & Midland Ave	Eligible/Architecturally Significant	
019.-14-05.3	215	Lincoln Pk Dr		NR Eligible (SHPO)
029.-03-03.0	208	Lincoln Pk Dr		NR Eligible (SHPO)
029.-01-02.0	104	Lincoln Pk Dr	Eligible/Architecturally Significant	
019.-14-08.0	201	Lincoln Pk Dr & Elm St		NR Eligible (SHPO)
029.-03-01.0	202	Lincoln Pk Dr & Elm St		NR Eligible (SHPO)
029.-03-05.0	214	Lincoln Pk Dr & Mather St		NR Eligible (SHPO)
029.-03-02.0	204	Lincoln Pk Dr To Elm St		NR Eligible (SHPO)
018.-10-08.0	707	Lodi St		NR Listed
018.-10-09.0	705	Lodi St		NR Listed
018.-10-10.0	703	Lodi St		NR Listed
016.-04-46.0	1210	Lodi St	Eligible/Architecturally Significant	
016.-05-05.0	1203	Lodi St	Eligible/Architecturally Significant	
018.-03-79.0	612	Lodi St	Eligible/Architecturally Significant	
018.-06-24.0	418	Lodi St	Eligible/Architecturally Significant	
018.-10-07.1	709	Lodi St		NR Listed
008.-13-08.0	1501-07	Lodi St & Ash St		NR Eligible (SHPO)
007.-13-07.0	2314	Lodi St & Court St	Eligible/Architecturally Significant	
018.-10-11.0	701	Lodi St & Green St		NR Listed
016.-05-02.0	1209-17	Lodi St & Laurel St E	Eligible/Architecturally Significant	

016.-04-43.0	1200	Lodi St & Seward St	Eligible/Architecturally Significant	
018.-10-05.0	713	Lodi St & Wayne St		NR Listed
016.-15-01.0	914	Lodi St & Willow St E & H	Local Protected Site or Local District	
111.-33-06.0	231	Lowell Ave N	Eligible/Architecturally Significant	
111.-33-07.0	229	Lowell Ave N	Eligible/Architecturally Significant	
111.-33-09.0	213	Lowell Ave N		NR Eligible (SHPO)
111.-24-05.0	305	Lowell Ave N	Eligible/Architecturally Significant	
111.-24-07.0	301	Lowell Ave N & Schuyler S	Eligible/Architecturally Significant	
110.-07-12.0	101-03	Lowell Ave N & Tompkins S	Eligible/Architecturally Significant	
110.-14-26.0	203	Lowell Ave S	Eligible/Architecturally Significant	
110.-16-34.0	306	Lowell Ave S	Eligible/Architecturally Significant	
110.-19-29.0	404	Lowell Ave S & Coleridge	Eligible/Architecturally Significant	
110.-10-29.0	110	Lowell Ave S & Tennyson A	Eligible/Architecturally Significant	
048.-12-07.0	819	Madison St		NR Listed
048.-11-10.0/1	917	Madison St #001	Eligible/Architecturally Significant	
047.-14-07.0	1326	Madison St & Cherry St	Eligible/Architecturally Significant	
102.-11-01.0	200	Madison St & State St S &	Eligible/Architecturally Significant	NR Listed
048.-20-13.1	910	Madison St & University	Eligible/Architecturally Significant	NR Listed
048.-10-11.0	1007	Madison St & Walnut Ave	Eligible/Architecturally Significant	
048.-20-02.0	922	Madison St & Walnut Ave	Local Protected Site or Local District	
048.-11-10.1	917	Madison St & Walnut Ave	Eligible/Architecturally Significant	
099.-04-05.0	204	Magnolia St	Eligible/Architecturally Significant	
047.-15-15.0	436	Maple St		NR Eligible (SHPO)
031.-14-04.0	200	Maple St & Washington St	Eligible/Architecturally Significant	
085.-11-01.1	116	Martin Luthr King E & State St		NR Eligible (SHPO)
085.-03-12.0	210-12	Martin Luthr King W	Eligible/Architecturally Significant	
077.-11-13.0	117	Mcallister Ave	Eligible/Architecturally Significant	
077.-11-17.0	109	Mcallister Ave	Eligible/Architecturally Significant	
077.-13-06.0	112	Mcallister Ave	Eligible/Architecturally Significant	
008.-12-07.0	1019	McBride St N	Eligible/Architecturally Significant	
008.-14-20.0	912	Mcbride St N	Eligible/Architecturally Significant	
008.-14-22.0	916-20	Mcbride St N	Eligible/Architecturally Significant	
017.-18-13.0	502	Mcbride St N		NR Eligible (SHPO)
017.-20-05.0	405	Mcbride St N	Eligible/Architecturally Significant	
103.-05-11.0	304	Mcbride St N		NR Listed
103.-05-13.0	306	Mcbride St N		NR Listed
017.-07-52.1	714	Mcbride St N		NR Eligible (SHPO)
008.-14-23.0	928	Mcbride St N & Ash St	Eligible/Architecturally Significant	
008.-14-16.0	900	McBride St N & Butternut	Eligible/Architecturally Significant	
008.-14-16.1	900	McBride St N & Butternut	Eligible/Architecturally Significant	
008.-14-16.2	900	McBride St N & Butternut	Eligible/Architecturally Significant	
103.-05-10.0	300	Mcbride St N & Hawley Ave		NR Listed
017.-18-12.0	500	Mcbride St N & Willow St	Local Protected Site or Local District	NR Eligible (SHPO)
008.-14-16.2/1	900	McBride St N Condo #1	Eligible/Architecturally Significant	
103.-05-12.0	306 1/2	Mcbride St N Rear		NR Listed
008.-15-01.0	915	Mcbride St N To Ash St	Eligible/Architecturally Significant	
084.-27-05.0	259	Mclennan Ave	Eligible/Architecturally Significant	
097.-06-19.0	118	Merriman Ave	Local Protected Site or Local District	
097.-16-47.0	322	Merriman Ave & Barrett St	Eligible/Architecturally Significant	
070.-08-11.0	3606	Midland Ave		NR Eligible (SHPO)
070.-08-13.0	3630	Midland Ave		NR Eligible (SHPO)
077.-24-39.0	1613	Midland Ave	Eligible/Architecturally Significant	
085.-14-16.0	651-53	Midland Ave		NR Eligible (SHPO)
093.-06-10.0	356	Midland Ave	Eligible/Architecturally Significant	
083.-02-27.0	1008	Midland Ave		NR Eligible (SHPO)
077.-01-01.1	1515	Midland Ave & Colvin St W	Eligible/Architecturally Significant	
073.-11-16.0	3316	Midland Ave & Florence Av		NR Eligible (SHPO)
083.-02-26.0	1002	Midland Ave & Kennedy St	Eligible/Architecturally Significant	
078.-10-03.0	2016-26	Midland Ave & Lafayette A	Eligible/Architecturally Significant	
027.-16-23.0	401-03	Midler Ave S & Sunnycrest	Eligible/Architecturally Significant	NR Eligible (SHPO)
070.-07-22.2	207	Milburn Dr		NR Eligible (SHPO)
070.-07-41.0	329	Milburn Dr	Local Protected Site or Local District	
070.-09-14.0	314-16	Milburn Dr		NR Eligible (SHPO)
070.-09-29.0	328	Milburn Dr	Local Protected Site or Local District	

038.-09-31.0	127	Milnor Ave		NR Eligible (SHPO)
111.-13-23.0	508-10	Milton Ave	Eligible/Architecturally Significant	
111.-22-18.0	406	Milton Ave		NR Eligible (SHPO)
102.-02-09.0	327	Montgomery St		NR Listed
102.-02-10.0	321-25	Montgomery St		NR Listed
102.-02-11.0	319	Montgomery St		NR Listed
102.-02-13.0	315	Montgomery St		NR Listed
102.-13-05.0	414-22	Montgomery St		NR Eligible (SHPO)
102.-01-04.0	318-22	Montgomery St		NR Listed
102.-01-05.0	330	Montgomery St		NR Listed
102.-01-06.0	340	Montgomery St		NR Listed
103.-27-02.0	217	Montgomery St & Fayette S	Eligible/Architecturally Significant	NR Listed
102.-01-03.0	300-10	Montgomery St & Fayette S	Local Protected Site or Local District	NR Listed
102.-02-08.0	335	Montgomery St & Jefferson	Local Protected Site or Local District	NR Listed
102.-01-07.0	350	Montgomery St & Jefferson	Local Protected Site or Local District	NR Listed
102.-13-06.0	424-26	Montgomery St & Madison S		NR Eligible (SHPO)
103.-17-05.1/4	106	Montgomery St Com Unit A		NR Listed
102.-02-12.0	317	Montgomery St Rear		NR Listed
102.-10-01.0	401	Montgomery St To State St	Local Protected Site or Local District	NR Listed
103.-17-05.1/1	106	Montgomery St Unit #1	Eligible/Architecturally Significant	NR Listed
103.-17-05.1/2	106	Montgomery St Unit #2		NR Listed
103.-17-05.1/3	106	Montgomery St Unit #3		NR Listed
075.-06-41.0	324	Newell St W	Eligible/Architecturally Significant	
100.-24-06.1	504	Niagara St		NR Eligible (SHPO)
100.-09-13.0	206-08	Niagara St	Eligible/Architecturally Significant	
096.-13-07.0	703	Niagara St	Eligible/Architecturally Significant	
038.-12-15.0	170	Niven St & Candee Ave	Eligible/Architecturally Significant	
019.-05-24.0	608	Oak St	Local Protected Site or Local District	
019.-05-25.0	610	Oak St	Local Protected Site or Local District	
016.-17-15.0	601-03	Oak St	Local Protected Site or Local District	
016.-18-13.0	531	Oak St	Local Protected Site or Local District	
016.-18-14.0	527	Oak St	Local Protected Site or Local District	
016.-18-15.0	525	Oak St	Local Protected Site or Local District	
016.-18-16.0	523	Oak St	Local Protected Site or Local District	
018.-02-16.0	405	Oak St	Eligible/Architecturally Significant	
018.-03-43.0	307	Oak St	Eligible/Architecturally Significant	
015.-05-01.0	1035	Oak St		NR Listed
019.-06-23.1	526	Oak St	Local Protected Site or Local District	
019.-06-24.0	528	Oak St	Local Protected Site or Local District	
016.-18-12.0	535	Oak St & Highland Ave	Local Protected Site or Local District	
019.-06-25.1	530	Oak St & Highland Ave	Local Protected Site or Local District	
019.-06-25.0	530	Oak St & Highland Ave	Local Protected Site or Local District	
085.-09-27.0	545-47	Oakwood Ave	Eligible/Architecturally Significant	
084.-06-09.0	631	Oakwood Ave		NR Eligible (SHPO)
084.-06-13.0	603	Oakwood Ave & Kennedy St		NR Eligible (SHPO)
083.-08-21.0	801-03	Onondaga Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
083.-08-22.0	713-15	Onondaga Ave	Eligible/Architecturally Significant	
083.-09-12.0	919	Onondaga Ave	Eligible/Architecturally Significant	
086.-01-24.0	203	Onondaga Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
086.-01-19.0	213	Onondaga Ave		NR Listed
086.-01-23.0	205	Onondaga Ave	Eligible/Architecturally Significant	
087.-06-03.0	202	Onondaga Ave	Eligible/Architecturally Significant	NR Listed
087.-06-04.0	204	Onondaga Ave	Eligible/Architecturally Significant	NR Listed
087.-06-05.0	206	Onondaga Ave	Eligible/Architecturally Significant	NR Listed
087.-06-06.0	208	Onondaga Ave		NR Listed
087.-06-07.0	210	Onondaga Ave		NR Listed
087.-06-09.0	300	Onondaga Ave	Eligible/Architecturally Significant	NR Listed
087.-06-10.0	312	Onondaga Ave		NR Listed
087.-06-11.0	318	Onondaga Ave		NR Listed
087.-06-12.0	320	Onondaga Ave		NR Listed
083.-13-20.0	910	Onondaga Ave	Eligible/Architecturally Significant	
086.-25-18.0	313	Onondaga Ave	Eligible/Architecturally Significant	
086.-25-19.0	311	Onondaga Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
086.-26-17.0	409	Onondaga Ave	Eligible/Architecturally Significant	

087.-06-13.0	326	Onondaga Ave		NR Listed
087.-06-14.0	332	Onondaga Ave	Eligible/Architecturally Significant	NR Listed
087.-06-15.0	334	Onondaga Ave		NR Listed
087.-06-16.0	336	Onondaga Ave		NR Listed
087.-06-17.0	338	Onondaga Ave		NR Listed
087.-06-18.0	402	Onondaga Ave		NR Listed
087.-06-19.0	406	Onondaga Ave	Eligible/Architecturally Significant	NR Listed
087.-06-20.0	408	Onondaga Ave		NR Listed
092.-13-07.0	102	Onondaga Ave	Eligible/Architecturally Significant	
092.-13-09.0	106	Onondaga Ave	Eligible/Architecturally Significant	
092.-13-10.0	108	Onondaga Ave	Eligible/Architecturally Significant	
083.-01-01.0	501	Onondaga Ave	Local Protected Site or Local District	
093.-14-18.0	123	Onondaga Ave	Eligible/Architecturally Significant	
093.-14-20.0	119	Onondaga Ave	Eligible/Architecturally Significant	
087.-06-02.0	200	Onondaga Ave & Bellevue A		NR Listed
093.-14-17.0	125	Onondaga Ave & Bellevue A	Eligible/Architecturally Significant	NR Eligible (SHPO)
086.-26-19.0	401-03	Onondaga Ave & Cheney St	Eligible/Architecturally Significant	NR Eligible (SHPO)
086.-25-24.0	301	Onondaga Ave & Sterling A	Eligible/Architecturally Significant	
082.-04-06.0	604	Onondaga Ave To Robert Av	Local Protected Site or Local District	NR Eligible (SHPO)
102.-02-06.0	337	Onondaga St E		NR Listed
102.-14-03.0	237-39	Onondaga St E	Local Protected Site or Local District	NR Listed
102.-09-02.0	304-10	Onondaga St E & Jefferson	Eligible/Architecturally Significant	NR Listed
102.-14-01.0	259-77	Onondaga St E & Jefferson	Local Protected Site or Local District	NR Listed
102.-13-01.0	214-232	Onondaga St E & Madison S	Local Protected Site or Local District	NR Listed
102.-13-04.0	290	Onondaga St E & Montgomer	Local Protected Site or Local District	NR Listed
102.-09-01.0	338	Onondaga St E & State St	Eligible/Architecturally Significant	
102.-02-07.0/5	333	Onondaga St E Condo Five		NR Listed
102.-02-07.0/4	333	Onondaga St E Condo Four		NR Listed
102.-02-07.4	333	Onondaga St E Condo Four		NR Listed
102.-02-07.0/1	333	Onondaga St E Condo One		NR Listed
102.-02-07.0/6	333	Onondaga St E Condo Six		NR Listed
102.-02-07.6	333	Onondaga St E Condo Six		NR Listed
102.-02-07.0/3	333	Onondaga St E Condo Three		NR Listed
102.-02-07.3	333	Onondaga St E Condo Three		NR Listed
102.-02-07.0/2	333	Onondaga St E Condo Two		NR Listed
102.-02-07.2	333	Onondaga St E Condo Two		NR Listed
091.-14-03.0	1659	Onondaga St W	Eligible/Architecturally Significant	
091.-14-10.0	1631-33	Onondaga St W	Eligible/Architecturally Significant	
091.-14-12.0	1621	Onondaga St W	Eligible/Architecturally Significant	
091.-14-15.0	1607	Onondaga St W	Eligible/Architecturally Significant	
092.-21-02.0	1185	Onondaga St W		NR Eligible (SHPO)
092.-13-02.0	839	Onondaga St W	Eligible/Architecturally Significant	NR Eligible (SHPO)
092.-13-04.0	831	Onondaga St W	Eligible/Architecturally Significant	NR Eligible (SHPO)
092.-13-05.0	825	Onondaga St W	Eligible/Architecturally Significant	NR Eligible (SHPO)
092.-14-03.0	1079-81	Onondaga St W	Eligible/Architecturally Significant	
092.-14-04.0	1075	Onondaga St W	Eligible/Architecturally Significant	
092.-14-05.1	1061-67	Onondaga St W	Eligible/Architecturally Significant	
092.-14-14.0	1017	Onondaga St W	Eligible/Architecturally Significant	
092.-14-15.0	1011	Onondaga St W	Eligible/Architecturally Significant	
092.-14-21.0	909	Onondaga St W	Eligible/Architecturally Significant	
093.-01-19.0	726	Onondaga St W	Local Protected Site or Local District	NR Listed
092.-23-06.0	1331	Onondaga St W	Eligible/Architecturally Significant	
091.-10-11.0	1614-16	Onondaga St W	Eligible/Architecturally Significant	
091.-10-13.0	1622-24	Onondaga St W	Eligible/Architecturally Significant	
091.-10-16.0	1634-36	Onondaga St W	Eligible/Architecturally Significant	
093.-02-28.0	610-12	Onondaga St W		NR Eligible (SHPO)
093.-02-32.0	630	Onondaga St W		NR Eligible (SHPO)
093.-02-35.1	652	Onondaga St W	Eligible/Architecturally Significant	
093.-02-35.2	658	Onondaga St W	Eligible/Architecturally Significant	
093.-02-36.0	664	Onondaga St W		NR Listed
093.-02-37.0	672	Onondaga St W	Eligible/Architecturally Significant	
093.-02-38.0	678	Onondaga St W	Local Protected Site or Local District	NR Eligible (SHPO)
093.-03-03.0	669	Onondaga St W		NR Eligible (SHPO)
093.-03-10.0	631-33	Onondaga St W		NR Eligible (SHPO)

093.-03-11.0	627	Onondaga St W	Eligible/Architecturally Significant	NR Eligible (SHPO)
093.-05-39.0	515-17	Onondaga St W	Eligible/Architecturally Significant	NR Listed
093.-05-40.0	509-11	Onondaga St W	Eligible/Architecturally Significant	
096.-11-02.0	366	Onondaga St W		NR Eligible (SHPO)
096.-14-09.0	500	Onondaga St W	Local Protected Site or Local District	NR Eligible (SHPO)
092.-14-01.1	1093-95	Onondaga St W & Dudley St	Eligible/Architecturally Significant	
091.-14-01.0	1665	Onondaga St W & Kandace S	Eligible/Architecturally Significant	
092.-14-22.0	903	Onondaga St W & Malcolm S		NR Eligible (SHPO)
092.-15-17.0	1000-16	Onondaga St W & Putnam St	Eligible/Architecturally Significant	
093.-05-38.0	523	Onondaga St W & South Ave	Eligible/Architecturally Significant	
092.-13-31.0	835	Onondaga St W Rear	Eligible/Architecturally Significant	NR Eligible (SHPO)
091.-02-32.1	1654	Onondaga St W To Rowland	Eligible/Architecturally Significant	NR Eligible (SHPO)
093.-15-02.0	757	Onondaga St W To Tallman		NR Eligible (SHPO)
093.-15-03.0	749	Onondaga St W To Tallman		NR Eligible (SHPO)
075.-11-04.0	609	Ostrander Ave W	Eligible/Architecturally Significant	
046.-02-01.0	501	Ostrom Ave	Local Protected Site or Local District	NR Listed
104.-03-01.0	471-81	Oswego Blvd		NR Eligible (SHPO)
100.-12-19.0	608	Otisco St	Eligible/Architecturally Significant	
086.-24-03.0	304-06	Palmer Ave	Eligible/Architecturally Significant	
086.-24-05.0	312-14	Palmer Ave	Eligible/Architecturally Significant	
105.-02-02.0	545-47	Park Ave		NR Eligible (SHPO)
106.-10-14.0	616	Park Ave	Eligible/Architecturally Significant	
106.-12-09.0	300-02	Park Ave		NR Eligible (SHPO)
106.-12-10.0	304-06	Park Ave		NR Eligible (SHPO)
106.-12-11.0	308-10	Park Ave		NR Eligible (SHPO)
106.-12-12.0	312-14	Park Ave		NR Eligible (SHPO)
106.-12-13.0	316-18	Park Ave		NR Eligible (SHPO)
105.-01-16.0	613	Park Ave	Eligible/Architecturally Significant	
105.-01-01.0	645	Park Ave & Geddes St N	Eligible/Architecturally Significant	
109.-02-01.0	927-35	Park Ave & Lakeview Ave &	Local Protected Site or Local District	NR Eligible (SHPO)
106.-11-10.0	404-06	Park Ave & Leavenworth Av		NR Eligible (SHPO)
109.-04-01.0	729	Park Ave & Wall St	Eligible/Architecturally Significant	
002.-16-11.0	1703	Park St		NR Eligible (SHPO)
015.-08-07.0	402	Park St	Eligible/Architecturally Significant	
007.-06-14.0	1504	Park St		NR Eligible (SHPO)
007.-06-15.0	1508	Park St	Eligible/Architecturally Significant	
007.-06-16.0	1510	Park St		NR Eligible (SHPO)
007.-21-16.0	1306	Park St	Eligible/Architecturally Significant	
007.-11-06.0	1408	Park St & Danforth St & C	Local Protected Site or Local District	
015.-12-01.1	501	Park St & Highland St	Local Protected Site or Local District	
009.-03-19.0	1101	Park St & Mary St To Neut	Eligible/Architecturally Significant	
015.-06-06.2	300	Park St & Oak St	Eligible/Architecturally Significant	
009.-05-41.0	1122	Park St & Strand Pl	Eligible/Architecturally Significant	
002.-24-10.0	1601	Park St & Turtle St	Eligible/Architecturally Significant	
007.-06-17.0	1512-14	Park St & Turtle St		NR Eligible (SHPO)
015.-07-06.0	316	Park St & Whitwell Dr	Eligible/Architecturally Significant	
009.-03-11.0	1117	Park St To Neutral Ct	Eligible/Architecturally Significant	
007.-05-04.0	1509	Park St to Pastime Dr	Local Protected Site or Local District	NR Eligible (SHPO)
082.-04-12.0	192	Parkside Ave	Eligible/Architecturally Significant	
083.-14-33.0	140	Parkside Ave	Eligible/Architecturally Significant	
083.-14-38.0	166	Parkside Ave	Eligible/Architecturally Significant	
083.-14-01.0	125	Parkview Ave	Eligible/Architecturally Significant	
082.-04-21.0	309	Parkway Dr		NR Eligible (SHPO)
118.-08-07.0/1	526	Plum St Comm #1-3A	Eligible/Architecturally Significant	
115.-22-07.4	526	Plum St Comm Condo #3A	Eligible/Architecturally Significant	
007.-33-21.0	111-13	Pond St	Eligible/Architecturally Significant	
007.-30-27.0	413	Pond St & Park St	Eligible/Architecturally Significant	
007.-29-25.1	507-09	Pond St To Park St	Eligible/Architecturally Significant	
075.-10-03.0	353	Primrose Ave	Eligible/Architecturally Significant	
008.-17-16.0	504	Prospect Ave		NR Listed
008.-17-17.0	506	Prospect Ave		NR Listed
008.-17-18.0	508-10	Prospect Ave		NR Listed
008.-17-21.0	516	Prospect Ave		NR Listed
008.-17-22.1	518	Prospect Ave & Ash St	Eligible/Architecturally Significant	NR Listed

092.-16-06.0	223	Putnam St		NR Eligible (SHPO)
088.-04-13.0	138-40	Reed Ave	Eligible/Architecturally Significant	
088.-04-15.0	146	Reed Ave	Eligible/Architecturally Significant	
082.-03-03.0	508	Roberts Ave	Eligible/Architecturally Significant	
082.-03-06.0	538	Roberts Ave	Eligible/Architecturally Significant	
082.-03-07.0	544	Roberts Ave	Eligible/Architecturally Significant	
082.-03-08.0	550	Roberts Ave	Eligible/Architecturally Significant	
082.-03-09.0	560	Roberts Ave	Eligible/Architecturally Significant	
087.-16-18.0	425	Roberts Ave	Eligible/Architecturally Significant	
082.-03-10.0	564	Roberts Ave	Eligible/Architecturally Significant	
082.-03-11.1	572	Roberts Ave	Eligible/Architecturally Significant	
082.-03-12.1	580	Roberts Ave	Eligible/Architecturally Significant	
082.-03-13.0	586	Roberts Ave	Eligible/Architecturally Significant	
082.-03-14.0	594	Roberts Ave	Eligible/Architecturally Significant	
082.-03-15.0	600	Roberts Ave	Eligible/Architecturally Significant	
082.-03-16.0	610	Roberts Ave	Eligible/Architecturally Significant	
082.-03-17.0	618	Roberts Ave	Eligible/Architecturally Significant	
082.-03-18.0	622	Roberts Ave	Eligible/Architecturally Significant	
082.-03-19.0	626	Roberts Ave	Eligible/Architecturally Significant	
082.-03-20.0	636	Roberts Ave	Eligible/Architecturally Significant	
082.-03-21.0	640	Roberts Ave	Eligible/Architecturally Significant	
082.-03-22.1	648	Roberts Ave	Eligible/Architecturally Significant	
082.-03-24.0	668	Roberts Ave	Eligible/Architecturally Significant	
082.-03-25.0	674	Roberts Ave	Eligible/Architecturally Significant	
082.-03-02.0	500	Roberts Ave & Crossett St	Eligible/Architecturally Significant	
080.-11-46.0	507	Robineau Rd		NR Eligible (SHPO)
082.-02-03.0	108	Robineau Rd	Eligible/Architecturally Significant	
082.-02-04.0	114	Robineau Rd	Eligible/Architecturally Significant	
082.-02-05.0	118	Robineau Rd	Eligible/Architecturally Significant	
080.-07-01.0	300	Robineau Rd		NR Listed
080.-07-02.0	302	Robineau Rd		NR Listed
080.-07-04.0	306	Robineau Rd		NR Listed
080.-08-15.0	311	Robineau Rd		NR Listed
080.-08-16.0	309	Robineau Rd		NR Listed
080.-08-17.0	307	Robineau Rd		NR Listed
080.-08-18.0	305	Robineau Rd		NR Listed
080.-08-19.0	303	Robineau Rd		NR Listed
080.-08-20.0	301	Robineau Rd		NR Listed
082.-05-06.0	182	Robineau Rd	Eligible/Architecturally Significant	
082.-05-07.0	190	Robineau Rd	Eligible/Architecturally Significant	
082.-05-08.0	204	Robineau Rd	Local Protected Site or Local District	
082.-05-09.0	210	Robineau Rd	Local Protected Site or Local District	
082.-05-10.0	216	Robineau Rd	Eligible/Architecturally Significant	
082.-05-11.0	224	Robineau Rd	Eligible/Architecturally Significant	
082.-05-12.0	228	Robineau Rd	Eligible/Architecturally Significant	
082.-05-13.1	236	Robineau Rd	Eligible/Architecturally Significant	
082.-05-19.0	282	Robineau Rd		NR Listed
080.-09-14.0	417	Robineau Rd		NR Listed
080.-09-15.0	415	Robineau Rd		NR Listed
080.-09-16.0	413	Robineau Rd		NR Listed
080.-09-17.0	411	Robineau Rd		NR Listed
080.-09-18.0	409	Robineau Rd		NR Listed
080.-09-19.0	407	Robineau Rd		NR Listed
080.-09-20.0	405	Robineau Rd		NR Listed
080.-09-21.0	403	Robineau Rd		NR Listed
080.-10-02.0	402	Robineau Rd		NR Listed
080.-10-03.0	404	Robineau Rd		NR Listed
080.-10-04.0	406	Robineau Rd		NR Listed
080.-10-05.0	408	Robineau Rd		NR Listed
080.-10-06.0	410	Robineau Rd		NR Listed
080.-10-07.0	412	Robineau Rd		NR Listed
080.-11-19.0	506	Robineau Rd		NR Eligible (SHPO)
080.-11-20.0	508	Robineau Rd		NR Eligible (SHPO)
080.-11-21.0	510	Robineau Rd		NR Eligible (SHPO)

080.-11-22.0	512	Robineau Rd		NR Eligible (SHPO)
080.-11-23.0	514	Robineau Rd		NR Eligible (SHPO)
080.-11-24.0	516	Robineau Rd		NR Eligible (SHPO)
080.-11-25.0	518	Robineau Rd		NR Eligible (SHPO)
080.-11-26.0	520	Robineau Rd		NR Eligible (SHPO)
080.-11-27.0	522	Robineau Rd		NR Eligible (SHPO)
080.-11-28.0	524	Robineau Rd		NR Eligible (SHPO)
080.-11-29.0	526	Robineau Rd		NR Eligible (SHPO)
080.-11-30.0	528	Robineau Rd		NR Eligible (SHPO)
080.-11-31.0	530	Robineau Rd		NR Eligible (SHPO)
080.-11-32.0	535	Robineau Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-11-33.0	533	Robineau Rd		NR Eligible (SHPO)
082.-03-32.0	263	Robineau Rd	Eligible/Architecturally Significant	
082.-03-34.0	257	Robineau Rd	Eligible/Architecturally Significant	
082.-03-35.0	255	Robineau Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
082.-03-36.0	245	Robineau Rd	Eligible/Architecturally Significant	
082.-03-37.0	237	Robineau Rd	Eligible/Architecturally Significant	
082.-03-38.0	229	Robineau Rd	Eligible/Architecturally Significant	
082.-03-39.0	225	Robineau Rd	Eligible/Architecturally Significant	NR Listed
082.-03-41.0	205	Robineau Rd	Eligible/Architecturally Significant	
082.-03-43.0	185	Robineau Rd	Eligible/Architecturally Significant	
082.-03-44.0	171	Robineau Rd	Eligible/Architecturally Significant	
082.-03-45.0	167	Robineau Rd	Eligible/Architecturally Significant	
082.-03-46.0	143	Robineau Rd	Eligible/Architecturally Significant	
082.-03-47.0	139	Robineau Rd	Eligible/Architecturally Significant	
082.-03-48.0	137	Robineau Rd	Eligible/Architecturally Significant	
082.-03-49.0	131	Robineau Rd	Eligible/Architecturally Significant	
082.-03-50.0	125-27	Robineau Rd	Eligible/Architecturally Significant	
082.-03-51.0	115	Robineau Rd	Eligible/Architecturally Significant	
082.-03-52.0	109	Robineau Rd	Eligible/Architecturally Significant	
080.-11-34.0	531	Robineau Rd		NR Eligible (SHPO)
080.-11-35.0	529	Robineau Rd		NR Eligible (SHPO)
080.-11-36.0	527	Robineau Rd		NR Eligible (SHPO)
080.-11-37.0	525	Robineau Rd		NR Eligible (SHPO)
080.-11-38.0	523	Robineau Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-11-39.0	521	Robineau Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-11-40.0	519	Robineau Rd		NR Eligible (SHPO)
080.-11-41.0	517	Robineau Rd		NR Eligible (SHPO)
080.-11-42.0	515	Robineau Rd		NR Eligible (SHPO)
080.-11-43.0	513	Robineau Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-11-44.0	511	Robineau Rd		NR Eligible (SHPO)
080.-11-45.0	509	Robineau Rd		NR Eligible (SHPO)
082.-05-01.3	150	Robineau Rd & Alanson Rd	Eligible/Architecturally Significant	
080.-07-05.0	308	Robineau Rd & Charmouth D		NR Listed
080.-08-14.0	313	Robineau Rd & Charmouth D		NR Listed
080.-09-22.0	401	Robineau Rd & Charmouth D		NR Listed
080.-10-01.0	400	Robineau Rd & Charmouth D		NR Listed
082.-02-01.0	100	Robineau Rd & Crossett St	Eligible/Architecturally Significant	
080.-11-47.0	501	Robineau Rd & Glenwood Av	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-09-13.0	419	Robineau Rd & Glenwood Av		NR Listed
080.-10-08.0	414	Robineau Rd & Glenwood Av		NR Listed
082.-03-31.0	265	Robineau Rd & Strathmore		NR Listed
082.-05-20.0	290	Robineau Rd & Twin Hls		NR Listed
082.-05-02.0	154	Robineau Rd To Alanson Rd	Eligible/Architecturally Significant	
082.-05-04.0	168	Robineau Rd To Alanson Rd	Eligible/Architecturally Significant	
082.-05-05.1	176	Robineau Rd To Alanson Rd	Eligible/Architecturally Significant	NR Listed
082.-05-16.0	256	Robineau Rd To Alanson Rd	Eligible/Architecturally Significant	
092.-25-04.0	327	Rowland St	Eligible/Architecturally Significant	
092.-25-08.0	319	Rowland St	Eligible/Architecturally Significant	
013.-25-12.0	902	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
013.-26-19.0	614	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
013.-26-20.0	616	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
013.-26-21.0	618	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
013.-26-22.0	628	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)

021.-06-40.0	122	Rugby Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
021.-07-11.0	101	Rugby Rd	Eligible/Architecturally Significant	
014.-10-03.0	323	Rugby Rd		NR Eligible (SHPO)
013.-26-23.0	708	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
013.-26-24.0	710	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
013.-26-25.1	712	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-02.0	901	Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
013.-25-13.0	906	Rugby Rd & Dewitt St	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-01.0	903	Rugby Rd & Dewitt St	Local Protected Site or Local District	NR Eligible (SHPO)
014.-09-02.0	401	Rugby Rd & Durston Ave	Eligible/Architecturally Significant	NR Eligible (SHPO)
014.-06-02.0	701	Rugby Rd & Hampshire Rd	Local Protected Site or Local District	NR Eligible (SHPO)
014.-10-11.0	301	Rugby Rd & Hampton Rd		NR Eligible (SHPO)
014.-06-01.0	715	Rugby Rd & Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-01.0	519	Rugby Rd & Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
087.-05-18.0	104	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-05-19.0	106	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-05-20.0	108	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-05-21.0	110	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-05-22.0	112	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-05-23.0	114	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-05-24.0	116	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-05-25.0	118	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-05-26.0	122	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-02.0	123	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-03.0	121	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-04.1	119	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-06.0	115	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-07.0	113	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-08.0	111	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-09.0	109	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-10.0	107	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-11.0	105	Ruskin Ave	Eligible/Architecturally Significant	NR Listed
092.-07-15.0	204	Sabine St		NR Eligible (SHPO)
008.-11-16.0	608-12	Salina St N		NR Listed
008.-11-17.0	614-16	Salina St N		NR Listed
008.-11-18.0	618-20	Salina St N		NR Listed
008.-11-19.0	626	Salina St N		NR Listed
008.-11-20.0	630-34	Salina St N		NR Listed
008.-11-21.0	638	Salina St N		NR Listed
008.-11-23.0	656	Salina St N		NR Listed
008.-19-05.0	561-63	Salina St N		NR Listed
008.-19-06.0	557	Salina St N		NR Listed
008.-19-07.0	553	Salina St N		NR Listed
008.-19-08.0	547	Salina St N		NR Listed
008.-19-09.0	541-45	Salina St N		NR Listed
008.-19-11.0	529-35	Salina St N		NR Listed
008.-19-12.0	525-27	Salina St N		NR Listed
008.-19-13.0	523	Salina St N		NR Listed
008.-19-14.0	517	Salina St N		NR Listed
002.-13-08.0	1629-35	Salina St N		NR Eligible (SHPO)
007.-34-25.0	930	Salina St N		NR Listed
007.-35-14.0	921-23	Salina St N		NR Listed
007.-35-15.0	917-19	Salina St N		NR Listed
007.-35-16.0	911	Salina St N		NR Listed
008.-01-06.0	851-53	Salina St N		NR Listed
008.-01-07.0	847-49	Salina St N		NR Listed
008.-01-08.0	843	Salina St N		NR Listed
008.-01-09.0	841	Salina St N		NR Listed
008.-01-10.0	835-37	Salina St N		NR Listed
008.-01-11.0	831-33	Salina St N		NR Listed
008.-01-12.0	827	Salina St N		NR Listed
008.-01-13.0	823-25	Salina St N		NR Listed
008.-01-14.0	821	Salina St N		NR Listed
008.-01-15.0	815-19	Salina St N		NR Listed

008.-01-16.1	807-13	Salina St N		NR Listed
017.-03-16.0	466	Salina St N		NR Eligible (SHPO)
017.-03-17.0	472-74	Salina St N		NR Eligible (SHPO)
017.-03-18.0	478	Salina St N		NR Eligible (SHPO)
017.-01-02.0	319-25	Salina St N		NR Eligible (SHPO)
008.-06-06.0	706-10	Salina St N		NR Listed
008.-06-09.0	722	Salina St N		NR Listed
008.-06-11.0	734-38	Salina St N		NR Listed
008.-06-13.0	744-46	Salina St N		NR Listed
008.-06-14.0	748-52	Salina St N		NR Listed
008.-06-15.0	754	Salina St N		NR Listed
008.-07-09.0	721	Salina St N		NR Listed
008.-07-12.0	705-09	Salina St N		NR Listed
008.-10-02.0	645-47	Salina St N		NR Listed
008.-10-03.0	633-39	Salina St N		NR Listed
008.-10-05.0	615-17	Salina St N		NR Listed
008.-10-06.0	613	Salina St N		NR Listed
008.-10-07.0	607-09	Salina St N		NR Listed
008.-10-08.0	603-05	Salina St N		NR Listed
104.-07-08.0	114-18	Salina St N		NR Eligible (SHPO)
104.-07-09.0	120-22	Salina St N		NR Eligible (SHPO)
104.-07-10.0	126-28	Salina St N		NR Eligible (SHPO)
008.-11-15.0	600-06	Salina St N & Ash St	Eligible/Architecturally Significant	NR Listed
008.-19-04.0	567-81	Salina St N & Ash St		NR Listed
008.-01-17.0	801-05	Salina St N & Catawba St		NR Listed
008.-02-05.0	800-02	Salina St N & Catawba St		NR Listed
008.-06-16.0	758	Salina St N & Catawba St		NR Listed
008.-07-01.0	755	Salina St N & Catawba St		NR Listed
008.-11-24.0	658-60	Salina St N & Division St		NR Listed
008.-06-05.0	700	Salina St N & Division St		NR Listed
008.-07-13.0	701-03	Salina St N & Division St		NR Listed
008.-10-01.0	649-57	Salina St N & Division St		NR Listed
104.-15-01.0	99	Salina St N & Erie Blvd W		NR Eligible (SHPO)
002.-03-05.0	1714	Salina St N & Exchange St	Eligible/Architecturally Significant	
007.-35-17.0	901-03	Salina St N & Isabella St		NR Listed
008.-01-05.0	855-57	Salina St N & Isabella St		NR Listed
008.-02-07.0	848-56	Salina St N & Isabella St		NR Listed
104.-07-07.0	108-12	Salina St N & James St		NR Listed
104.-16-01.0	100	Salina St N & James St &		NR Listed
008.-18-04.0	530	Salina St N & Prospect Av		NR Listed
017.-01-01.0	329	Salina St N & Salt St	Eligible/Architecturally Significant	NR Eligible (SHPO)
007.-35-08.0	953-55	Salina St N & Union Pl To		NR Listed
008.-19-20.2	539	Salina St N Rear		NR Listed
008.-11-22.0	642-50	Salina St N To Division S		NR Listed
008.-06-07.0	712-14	Salina St N To Gebhardt A		NR Listed
008.-06-08.0	716-18	Salina St N To Gebhardt A		NR Listed
008.-06-10.0	730-32	Salina St N To Gebhardt A		NR Listed
008.-06-12.0	740-42	Salina St N To Gebhardt A		NR Listed
008.-02-06.0	812	Salina St N To Isabella S	Local Protected Site or Local District	NR Listed
008.-07-05.0	741	Salina St N To Lock Ally		NR Listed
008.-07-02.0	753	Salina St N To Lock Aly		NR Listed
008.-07-03.0	751	Salina St N To Lock Aly		NR Listed
008.-07-04.0	745	Salina St N To Lock Aly		NR Listed
008.-07-06.0	731-33	Salina St N To Lock Aly		NR Listed
008.-07-07.0	727-29	Salina St N To Lock Aly		NR Listed
008.-07-08.0	723-25	Salina St N To Lock Aly		NR Listed
008.-07-10.0	717	Salina St N To Lock Aly		NR Listed
008.-07-11.0	713-15	Salina St N To Lock Aly		NR Listed
008.-18-02.0	522-24	Salina St N To Prospect A		NR Listed
008.-18-03.0	526-28	Salina St N To Prospect A		NR Listed
017.-02-04.0	449	Salina St N To Salt St		NR Listed
017.-02-05.0	447	Salina St N To Salt St		NR Eligible (SHPO)
017.-02-06.0	443	Salina St N To Salt St		NR Eligible (SHPO)
017.-02-07.0	437	Salina St N To Salt St		NR Eligible (SHPO)

017.-02-08.0	435	Salina St N To Salt St		NR Eligible (SHPO)
017.-02-09.0	429	Salina St N To Salt St		NR Eligible (SHPO)
017.-02-10.1	423-25	Salina St N To Salt St		NR Eligible (SHPO)
017.-02-12.0	417-19	Salina St N To Salt St		NR Eligible (SHPO)
017.-02-13.0	413-15	Salina St N To Salt St		NR Eligible (SHPO)
017.-02-14.1	401-11	Salina St N To Salt St		NR Eligible (SHPO)
008.-10-04.0	619	Salina St N To State St N		NR Listed
007.-35-09.0	947-49	Salina St N To Titus Alle		NR Listed
007.-35-10.0	941-43	Salina St N To Titus Alle		NR Listed
007.-35-11.0	937-39	Salina St N To Titus Alle		NR Listed
007.-35-12.0	935	Salina St N To Titus Alle		NR Listed
007.-35-13.0	925-31	Salina St N To Titus Alle		NR Listed
067.-16-32.0	5217	Salina St S		NR Eligible (SHPO)
076.-05-07.0	3009	Salina St S	Eligible/Architecturally Significant	
064.-11-35.0	5721	Salina St S		NR Eligible (SHPO)
072.-01-34.0	3628	Salina St S		NR Eligible (SHPO)
084.-03-29.0	1825	Salina St S		NR Listed
084.-03-30.0	1815-17	Salina St S		NR Listed
084.-03-31.0	1807	Salina St S		NR Listed
084.-03-32.0	1803	Salina St S		NR Listed
084.-03-33.0	1735	Salina St S		NR Listed
084.-03-34.0	1725	Salina St S		NR Listed
084.-03-35.0	1721-23	Salina St S		NR Listed
084.-03-36.0	1709	Salina St S		NR Listed
084.-03-38.0	1631	Salina St S	Local Protected Site or Local District	NR Listed
084.-03-39.0	1621-23	Salina St S		NR Listed
084.-03-40.0	1617-19	Salina St S		NR Listed
084.-03-41.0	1615	Salina St S		NR Listed
084.-03-42.0	1607-09	Salina St S		NR Listed
064.-02-10.0	5558	Salina St S		NR Eligible (SHPO)
064.-02-18.0	5700	Salina St S		NR Eligible (SHPO)
068.-01-18.0	4914	Salina St S		NR Eligible (SHPO)
068.-01-22.0	4954	Salina St S		NR Eligible (SHPO)
077.-03-02.0	2226-28	Salina St S	Eligible/Architecturally Significant	
077.-03-03.0	2306	Salina St S		NR Eligible (SHPO)
077.-07-23.0	2319	Salina St S	Eligible/Architecturally Significant	
084.-02-09.0	1622	Salina St S		NR Listed
084.-02-10.0	1632	Salina St S		NR Listed
076.-03-10.0	2913-15	Salina St S		NR Eligible (SHPO)
076.-03-11.0	2907	Salina St S		NR Eligible (SHPO)
085.-04-02.0	1300-40	Salina St S		NR Eligible (SHPO)
085.-11-01.2	1431	Salina St S	Local Protected Site or Local District	NR Eligible (SHPO)
084.-20-09.0	1712-14	Salina St S		NR Listed
084.-20-10.0	1722	Salina St S		NR Listed
084.-21-08.0	1818	Salina St S		NR Listed
084.-23-19.0	2010	Salina St S	Local Protected Site or Local District	
077.-03-03.1	2306	Salina St S	Eligible/Architecturally Significant	
101.-05-05.0	306-12	Salina St S		NR Listed
101.-05-06.0	320-24	Salina St S		NR Listed
101.-05-07.0	326	Salina St S		NR Listed
101.-05-09.0	336	Salina St S		NR Listed
101.-05-10.0	338-46	Salina St S		NR Listed
101.-05-11.0	348-52	Salina St S		NR Listed
101.-05-12.0	358	Salina St S		NR Listed
101.-08-05.0	449-53	Salina St S	Eligible/Architecturally Significant	NR Listed
077.-11-20.11	2503-17	Salina St S & Amherst Ave	Eligible/Architecturally Significant	
077.-11-20.2	2503-17	Salina St S & Amherst Ave	Eligible/Architecturally Significant	
084.-03-28.0	1829	Salina St S & Borden Ave		NR Listed
084.-21-09.0	1830	Salina St S & Borden Ave		NR Listed
067.-15-32.0	5323	Salina St S & Brampton Rd		NR Eligible (SHPO)
094.-19-20.1	1001-05	Salina St S & Burt St		NR Eligible (SHPO)
104.-18-01.0	98	Salina St S & Erie Blvd W		NR Eligible (SHPO)
101.-05-04.0	300	Salina St S & Fayette St	Eligible/Architecturally Significant	NR Listed
104.-26-01.0	215-23	Salina St S & Fayette St		NR Listed

101.-06-12.0	301	Salina St S & Fayette St E	Eligible/Architecturally Significant	NR Listed
067.-21-26.0	5516	Salina St S & Hilton Rd		NR Eligible (SHPO)
101.-06-01.1	359	Salina St S & Jefferson S		NR Listed
101.-08-07.0	401	Salina St S & Jefferson S	Eligible/Architecturally Significant	NR Listed
084.-03-43.0	1603-05	Salina St S & Kennedy St		NR Listed
084.-02-08.0	1606	Salina St S & Kennedy St		NR Listed
085.-11-18.0	1555	Salina St S & Kennedy St	Eligible/Architecturally Significant	NR Listed
084.-02-11.0	1638	Salina St S & Kirk Ave		NR Listed
084.-20-08.0	1704	Salina St S & Kirk Ave		NR Listed
076.-03-12.0	2905	Salina St S & Lafayette A		NR Eligible (SHPO)
084.-20-11.0	1730	Salina St S & Mclennan Av		NR Listed
084.-21-07.0	1800	Salina St S & Mclennan Av		NR Listed
096.-05-01.0	500-50	Salina St S & Onondaga St	Eligible/Architecturally Significant	NR Listed
064.-18-01.0	5841	Salina St S & Parrish Lan		NR Eligible (SHPO)
064.-03-20.0	5583	Salina St S & Richfield A		NR Eligible (SHPO)
104.-26-03.0	201	Salina St S & Washington		NR Listed
104.-26-02.1	201-13	Salina St S & Washington St E		NR Listed
104.-24-09.0	101	Salina St S & Water St E		NR Listed
084.-24-24.0	2102-04	Salina St S & Wood Ave	Eligible/Architecturally Significant	
101.-06-02.1	333-49	Salina St S To Bank Alley		NR Listed
101.-06-04.0	331	Salina St S To Bank Alley		NR Listed
101.-06-05.0	329	Salina St S To Bank Alley		NR Listed
101.-06-06.0	327	Salina St S To Bank Alley	Eligible/Architecturally Significant	NR Listed
101.-06-08.0	323	Salina St S To Bank Alley	Eligible/Architecturally Significant	NR Listed
101.-06-09.0	321	Salina St S To Bank Alley	Eligible/Architecturally Significant	NR Listed
101.-06-10.0	317-19	Salina St S To Bank Alley	Eligible/Architecturally Significant	NR Listed
101.-06-11.0	313	Salina St S To Bank Alley	Eligible/Architecturally Significant	NR Listed
101.-06-07.1	325	Salina St S To Bank Alley		NR Listed
104.-26-02.0	205-13	Salina St S To Bank Alley		NR Listed
094.-19-19.1	1013	Salina St S To Burt St To		NR Eligible (SHPO)
101.-05-08.0	328-34	Salina St S To Clinton St		NR Listed
101.-10-02.0	444	Salina St S To Clinton St		NR Listed
101.-10-03.1	450-60	Salina St S To Clinton St	Eligible/Architecturally Significant	NR Listed
101.-10-05.0	462-74	Salina St S To Clinton St	Eligible/Architecturally Significant	NR Listed
077.-04-18.0	2209-13	Salina St S To Colvin St	Eligible/Architecturally Significant	
067.-13-31.1	5513	Salina St S To Conifer Dr		NR Eligible (SHPO)
071.-10-16.0	4405-13	Salina St S To Glen Ave E		NR Eligible (SHPO)
101.-05-13.0	362-64	Salina St S To Jefferson	Local Protected Site or Local District	NR Listed
038.-11-10.0	709	Salt Springs Rd	Eligible/Architecturally Significant	
038.-13-26.0	531	Salt Springs Rd	Eligible/Architecturally Significant	
038.-16-31.0	960	Salt Springs Rd	Eligible/Architecturally Significant	
037.-09-20.0	215	Salt Springs Rd		NR Listed
037.-12-01.0	230	Salt Springs Rd		NR Eligible (SHPO)
037.-09-21.0	201	Salt Springs Rd & Bruce S		NR Eligible (SHPO)
039.-10-01.0	1146-54	Salt Springs Rd & Demong	Eligible/Architecturally Significant	NR Eligible (SHPO)
037.-09-19.0	225	Salt Springs Rd & Fenway		NR Eligible (SHPO)
037.-10-26.0	303	Salt Springs Rd & Fenway		NR Listed
107.-07-10.0	301	Sand St To Marquette St	Eligible/Architecturally Significant	
111.-08-02.1	209	School St	Eligible/Architecturally Significant	
111.-32-03.1	417-19	Schuyler St	Eligible/Architecturally Significant	
111.-25-11.0	418	Schuyler St		NR Eligible (SHPO)
111.-34-01.0	213	Schuyler St & Lowell Ave	Eligible/Architecturally Significant	
037.-16-14.0	213	Scottholm Blvd	Eligible/Architecturally Significant	
037.-17-07.0	108	Scottholm Blvd	Eligible/Architecturally Significant	
045.-06-01.0	200	Scottholm Blvd & Crawford		NR Listed
045.-06-08.0	214	Scottholm Blvd & Scott Av	Eligible/Architecturally Significant	
037.-15-14.0	301	Scottholm Blvd & Scott Av		NR Listed
045.-05-25.0	211	Scottholm Terr	Local Protected Site or Local District	
037.-17-09.0	100	Scottholm Terr		NR Listed
037.-17-10.0	102	Scottholm Terr		NR Eligible (SHPO)
037.-17-11.0	104	Scottholm Terr	Eligible/Architecturally Significant	
037.-17-13.0	112	Scottholm Terr		NR Listed
013.-17-38.0	617	Scoville Ave	Eligible/Architecturally Significant	
013.-25-10.0	503	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)

014.-05-04.0	413	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-05.0	411	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-06.0	409	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-07.0	407	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-08.0	405	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-09.0	403	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-10.0	401	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-11.0	309	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-12.0	307	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-13.0	305	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-14.0	303	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-10.0	402	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-11.0	404	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-12.0	406	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-13.0	408	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-14.0	410	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
019.-03-12.0	209	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
019.-03-13.0	207	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
019.-03-14.0	205	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
019.-03-15.0	203	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-15.0	412	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-16.0	414	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-17.0	416	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-10.0	306	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-11.0	310	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-12.0	312	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-13.0	318	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-19.0	202	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
019.-07-07.0	107	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
019.-07-08.1	105	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
019.-07-09.1	103	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
013.-25-07.0	509	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
013.-25-08.0	507	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
013.-25-09.0	505	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-20.0	204	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-21.0	206	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-22.0	208	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-23.0	210	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-09-37.0	104	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-09-38.0	106	Sedgwick Dr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-09-39.0	108	Sedgwick Dr & Brattle Rd	Local Protected Site or Local District	NR Eligible (SHPO)
014.-05-15.0	301	Sedgwick Dr & Farmer St	Local Protected Site or Local District	NR Eligible (SHPO)
019.-03-11.0	211	Sedgwick Dr & Farmer St	Local Protected Site or Local District	NR Eligible (SHPO)
014.-06-09.0	400	Sedgwick Dr & Hampshire R	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-14.0	320	Sedgwick Dr & Hampshire R	Local Protected Site or Local District	NR Eligible (SHPO)
019.-07-10.0	101	Sedgwick Dr & James St	Local Protected Site or Local District	NR Eligible (SHPO)
013.-25-11.0	501	Sedgwick Dr & Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
013.-26-26.0	500	Sedgwick Dr & Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-09.0	300	Sedgwick Dr & Wendell Ter	Local Protected Site or Local District	NR Eligible (SHPO)
019.-14-25.0	220	Sedgwick St	Eligible/Architecturally Significant	
019.-14-26.0	224	Sedgwick St	Eligible/Architecturally Significant	
068.-03-08.0	382	Seneca Tnpk E		NR Eligible (SHPO)
071.-16-11.0	205	Seneca Tnpk E		NR Listed
071.-16-07.0	235	Seneca Tnpk E & Monticell		NR Eligible (SHPO)
070.-09-18.0	318	Seneca Tnpk W		NR Eligible (SHPO)
070.-09-20.0	328	Seneca Tnpk W		NR Eligible (SHPO)
069.-01-01.0	711	Seneca Tnpk W		NR Eligible (SHPO)
069.-05-01.1	417	Seneca Tnpk W	Local Protected Site or Local District	NR Eligible (SHPO)
069.-06-09.0	313	Seneca Tnpk W	Eligible/Architecturally Significant	NR Eligible (SHPO)
069.-06-10.0	305	Seneca Tnpk W & Academy G	Eligible/Architecturally Significant	NR Eligible (SHPO)
071.-19-23.0	174-76	Seneca Tnpk W & Midland A	Eligible/Architecturally Significant	
070.-07-14.0	290	Seneca Tnpk W & Milburn D		NR Eligible (SHPO)
070.-09-16.0	300	Seneca Tnpk W & Milburn D	Eligible/Architecturally Significant	
096.-01-11.0	222-24	Seymour St	Eligible/Architecturally Significant	

096.-03-07.0	116-18	Seymour St		NR Eligible (SHPO)
097.-04-41.0	411	Seymour St		NR Eligible (SHPO)
096.-01-14.0	230	Seymour St & Niagara St	Eligible/Architecturally Significant	
029.-10-18.0	172	Sherwood Ave	Eligible/Architecturally Significant	
029.-11-04.0	141	Sherwood Ave	Eligible/Architecturally Significant	
097.-04-54.0	316	Shonnard St		NR Eligible (SHPO)
096.-14-21.0	205	Slocum Ave		NR Eligible (SHPO)
118.-02-16.5	115	Solar St		NR Listed
118.-06-01.0	156	Solar St & Division St W	Eligible/Architecturally Significant	
093.-05-34.0	133	South Ave		NR Eligible (SHPO)
064.-21-01.0	157-83	Spaulding Ave To Onondaga	Eligible/Architecturally Significant	
118.-01-05.1	405	Spencer St & Maltbie St	Eligible/Architecturally Significant	
117.-08-11.1	412	Spencer St Rear	Eligible/Architecturally Significant	NR Eligible (SHPO)
117.-08-08.1	412	Spencer St To Onondaga Cr	Eligible/Architecturally Significant	
002.-19-07.0	1405	Spring St		NR Eligible (SHPO)
002.-21-22.0	1316	Spring St & Bear St	Eligible/Architecturally Significant	
002.-07-01.0	1522	Spring St & Wolf St	Eligible/Architecturally Significant	
111.-05-02.0	204	St Marks Ave	Eligible/Architecturally Significant	
017.-12-02.0	525-27	State St N	Eligible/Architecturally Significant	
017.-12-03.0	521-23	State St N	Eligible/Architecturally Significant	
017.-12-06.0	511-13	State St N	Eligible/Architecturally Significant	
017.-13-02.1	429	State St N & Belden Ave E	Eligible/Architecturally Significant	NR Eligible (SHPO)
008.-08-20.0	1042	State St N & Catawba St		NR Eligible (SHPO)
017.-03-10.0	602	State St N & Laurel St E		NR Eligible (SHPO)
017.-03-13.1	622-30	State St N & Salina St N		NR Eligible (SHPO)
017.-14-01.0	301-19	State St N & Willow St E	Eligible/Architecturally Significant	
017.-21-14.0	214	State St N & Willow St E	Local Protected Site or Local District	NR Listed
017.-22-01.0	215	State St N & Willow St E	Eligible/Architecturally Significant	
017.-02-01.0	707-09	State St N To Salt St		NR Eligible (SHPO)
017.-02-02.0	705	State St N To Salt St		NR Eligible (SHPO)
017.-02-03.0	701	State St N To Salt St		NR Eligible (SHPO)
085.-10-36.0	1425	State St S	Eligible/Architecturally Significant	NR Eligible (SHPO)
085.-11-11.1	1480-82	State St S		NR Eligible (SHPO)
102.-07-02.0	727	State St S		NR Eligible (SHPO)
103.-26-06.0	201	State St S & Fayette St E		NR Eligible (SHPO)
085.-11-12.1	1484-86	State St S & Kennedy St E		NR Eligible (SHPO)
085.-10-39.1	1401-03	State St S & Martin Luther E		NR Eligible (SHPO)
080.-06-02.0	802	Stinard Ave		NR Listed
080.-06-03.0	804	Stinard Ave		NR Listed
080.-06-04.0	806	Stinard Ave		NR Listed
080.-06-05.0	808	Stinard Ave		NR Listed
080.-06-06.0	810	Stinard Ave		NR Listed
082.-01-11.0	640	Stinard Ave	Eligible/Architecturally Significant	
080.-06-01.0	800	Stinard Ave		NR Listed
080.-10-12.0	805	Stinard Ave		NR Listed
080.-10-13.0	803	Stinard Ave		NR Listed
080.-10-14.0	801	Stinard Ave		NR Listed
087.-01-05.0	116-18	Stinard Ave	Eligible/Architecturally Significant	
087.-01-06.0	120	Stinard Ave	Eligible/Architecturally Significant	
082.-08-15.0	732	Stinard Ave		NR Listed
082.-08-16.0	734	Stinard Ave		NR Listed
082.-08-17.0	736	Stinard Ave		NR Listed
082.-08-18.0	738	Stinard Ave		NR Listed
082.-08-19.0	742	Stinard Ave		NR Listed
082.-08-20.0	744	Stinard Ave		NR Listed
082.-08-21.0	746	Stinard Ave		NR Listed
082.-08-22.0	748	Stinard Ave		NR Listed
082.-08-23.0	750	Stinard Ave		NR Listed
082.-08-24.0	752	Stinard Ave		NR Listed
082.-09-13.0	749	Stinard Ave		NR Listed
082.-09-14.0	747	Stinard Ave		NR Listed
087.-17-25.0	517	Stinard Ave	Eligible/Architecturally Significant	
082.-09-15.0	745	Stinard Ave & Alanson Rd		NR Listed
087.-17-21.0	535	Stinard Ave & Crossett St	Eligible/Architecturally Significant	

080.-06-07.0	812	Stinard Ave & Glenwood Av		NR Listed
087.-10-10.0	424	Stinard Ave & Gordon Ave	Eligible/Architecturally Significant	
082.-07-15.1	735	Stinard Ave to Alanson Rd		NR Listed
088.-16-03.0	1113	Stolp Ave	Eligible/Architecturally Significant	
088.-16-04.0	1109	Stolp Ave	Eligible/Architecturally Significant	
087.-12-04.0	409	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-13-02.0	315-17	Stolp Ave	Eligible/Architecturally Significant	
087.-07-17.0	122	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-18.0	126	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-19.0	132	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-20.0	136	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-21.0	200	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-22.0	204	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-14-02.0	225	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-14-03.0	219	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-14-04.0	215	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-14-05.0	209	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-15-02.0	127	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-15-03.0	123	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-23.0	208	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-24.0	212	Stolp Ave		NR Listed
087.-07-25.0	218	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-26.0	224	Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-15-01.0	133	Stolp Ave & Beverly Rd	Eligible/Architecturally Significant	NR Listed
087.-13-03.0	301	Stolp Ave & Clairemont Av	Eligible/Architecturally Significant	NR Listed
087.-04-21.0	300	Stolp Ave & Clairemont Av	Eligible/Architecturally Significant	NR Listed
087.-07-27.0	228	Stolp Ave & Clairemont Av	Eligible/Architecturally Significant	NR Listed
087.-04-24.0	324	Stolp Ave & Hubbell Ave	Eligible/Architecturally Significant	
088.-05-23.0	1100	Stolp Ave & Rider Ave	Eligible/Architecturally Significant	
052.-12-01.0	216	Stratford St	Local Protected Site or Local District	NR Listed
052.-12-02.0	220	Stratford St	Local Protected Site or Local District	NR Listed
052.-12-03.0	226	Stratford St	Local Protected Site or Local District	NR Listed
052.-12-04.0	300	Stratford St	Local Protected Site or Local District	NR Listed
052.-12-05.0	304	Stratford St	Local Protected Site or Local District	NR Listed
052.-12-06.0	310	Stratford St	Local Protected Site or Local District	NR Listed
052.-12-07.0	314	Stratford St	Local Protected Site or Local District	NR Listed
052.-12-08.0	318	Stratford St	Local Protected Site or Local District	NR Listed
052.-13-01.0	126	Stratford St	Local Protected Site or Local District	NR Listed
080.-06-11.0	315	Strathmore Dr		NR Listed
080.-06-12.0	313	Strathmore Dr		NR Listed
082.-09-04.0	202	Strathmore Dr		NR Listed
082.-09-05.0	204	Strathmore Dr		NR Listed
082.-09-06.0	206	Strathmore Dr		NR Listed
082.-09-07.0	208	Strathmore Dr		NR Listed
082.-09-08.0	210	Strathmore Dr		NR Listed
082.-09-09.0	212	Strathmore Dr		NR Listed
082.-09-10.0	214	Strathmore Dr		NR Listed
082.-09-11.0	216	Strathmore Dr		NR Listed
080.-06-13.0	311	Strathmore Dr		NR Listed
080.-06-14.0	309	Strathmore Dr		NR Listed
080.-06-15.0	307	Strathmore Dr		NR Listed
080.-06-16.0	305	Strathmore Dr		NR Listed
080.-07-13.0	223	Strathmore Dr		NR Listed
080.-07-14.0	221	Strathmore Dr		NR Listed
080.-07-15.0	219	Strathmore Dr		NR Listed
080.-07-16.0	217	Strathmore Dr		NR Listed
080.-07-17.0	215	Strathmore Dr		NR Listed
080.-07-18.0	213	Strathmore Dr		NR Listed
080.-07-19.0	211	Strathmore Dr		NR Listed
080.-07-20.0	209	Strathmore Dr		NR Listed
080.-07-21.0	207	Strathmore Dr		NR Listed
080.-07-22.0	205	Strathmore Dr		NR Listed
080.-08-02.0	113	Strathmore Dr		NR Listed
080.-08-03.0	111	Strathmore Dr		NR Listed

080.-08-04.0	109	Strathmore Dr		NR Listed
080.-08-05.0	107	Strathmore Dr		NR Listed
080.-05-06.0	302	Strathmore Dr		NR Listed
080.-05-07.0	304	Strathmore Dr		NR Listed
080.-05-08.0	306	Strathmore Dr		NR Listed
080.-05-09.0	308	Strathmore Dr		NR Listed
080.-05-10.0	310	Strathmore Dr		NR Listed
080.-05-11.0	312	Strathmore Dr		NR Listed
080.-05-12.0	314	Strathmore Dr		NR Listed
082.-03-26.0	100	Strathmore Dr		NR Listed
082.-03-27.0	102	Strathmore Dr		NR Listed
082.-03-28.0	104	Strathmore Dr		NR Listed
082.-03-29.0	106	Strathmore Dr		NR Listed
082.-03-30.0	108	Strathmore Dr		NR Listed
082.-04-59.0	101	Strathmore Dr & Colvin St		NR Listed
080.-05-14.0	318	Strathmore Dr & Geddes St		NR Listed
080.-07-24.0	201	Strathmore Dr & Robineau		NR Listed
080.-08-01.0	115	Strathmore Dr & Robineau		NR Listed
080.-06-17.0	301-03	Strathmore Dr & Stinard A		NR Listed
080.-07-12.0	225	Strathmore Dr & Stinard A		NR Listed
080.-05-05.0	300	Strathmore Dr & Stinard A		NR Listed
082.-09-12.0	218	Strathmore Dr & Stinard A		NR Listed
082.-09-03.0	200	Strathmore Dr & Twin Hl		NR Listed
080.-08-06.0	105	Strathmore Dr & Wellesley		NR Listed
080.-05-13.0	316	Strathmore Dr To Geddes S		NR Listed
080.-07-23.0	203	Strathmore Dr To Robineau		NR Listed
079.-06-09.0	718	Summit Ave	Eligible/Architecturally Significant	
087.-15-06.0	304	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-15-07.0	306	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-15-08.0	308	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-15-09.0	310	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-15-10.0	312	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-05-11.0	102	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-05-13.0	106	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-05-14.0	108	Summit Ave		NR Listed
087.-05-15.0	110	Summit Ave		NR Listed
087.-05-16.0	110 1/2	Summit Ave		NR Listed
087.-06-28.0	311	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-29.0	309	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-30.0	307	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-32.0	303	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-33.0	301	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-34.0	213	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-35.0	211	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-37.1	207-09	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-38.0	203	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-39.0	201	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-40.0	117	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-41.0	115	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-42.0	113	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-43.0	111	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-44.0	109	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-45.0	107	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-06-46.0	105	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-07-13.0	202	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-07-14.0	204	Summit Ave	Eligible/Architecturally Significant	NR Listed
079.-08-32.0	615-17	Summit Ave	Eligible/Architecturally Significant	
087.-15-05.0	302	Summit Ave	Eligible/Architecturally Significant	NR Listed
087.-05-10.0	100	Summit Ave & Bellevue Ave		NR Listed
079.-03-04.0	600	Summit Ave & Colvin St W	Eligible/Architecturally Significant	
087.-15-11.0	314	Summit Ave & Crossett St	Eligible/Architecturally Significant	NR Listed
087.-05-17.0	112	Summit Ave & Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-12.0	200	Summit Ave & Ruskin Ave	Eligible/Architecturally Significant	NR Listed
087.-07-16.0	208	Summit Ave & Stolp Ave	Eligible/Architecturally Significant	NR Listed

087.-15-04.0	300	Summit Ave & Stolp Ave	Eligible/Architecturally Significant	NR Listed
087.-07-15.0	206	Summit Ave To Stolp Ave	Local Protected Site or Local District	NR Listed
046.-13-12.0	735	Sumner Ave		NR Listed
019.-20-12.0	901-03	Teall Ave & Herbst Ave	Eligible/Architecturally Significant	
052.-11-19.0	117	Terrace Rd	Local Protected Site or Local District	NR Listed
052.-11-20.0	115	Terrace Rd	Local Protected Site or Local District	NR Listed
052.-11-21.0	111	Terrace Rd	Local Protected Site or Local District	NR Listed
052.-11-22.0	107	Terrace Rd	Local Protected Site or Local District	NR Listed
110.-10-24.0	305	Tompkins St	Eligible/Architecturally Significant	
110.-11-05.0	611	Tompkins St		NR Eligible (SHPO)
110.-11-13.0	561	Tompkins St	Eligible/Architecturally Significant	
110.-04-14.0	606	Tompkins St	Eligible/Architecturally Significant	
110.-08-36.1	228	Tompkins St & Lowell Ave	Eligible/Architecturally Significant	
008.-02-01.1	1109-27	Townsend St N		NR Listed
008.-11-09.0	907	Townsend St N		NR Eligible (SHPO)
103.-07-15.0	206	Townsend St N	Eligible/Architecturally Significant	
008.-17-03.1	823	Townsend St N & Ash	Eligible/Architecturally Significant	NR Eligible (SHPO)
008.-16-21.0	826	Townsend St N & Ash St	Eligible/Architecturally Significant	
103.-07-13.0	202	Townsend St N & Burnet Av	Eligible/Architecturally Significant	
008.-12-16.0	924	Townsend St N & Division	Eligible/Architecturally Significant	
103.-07-17.0	212	Townsend St N & Hawley Av	Eligible/Architecturally Significant	
103.-21-10.0	115	Townsend St S	Local Protected Site or Local District	
103.-25-09.0	205	Townsend St S		NR Eligible (SHPO)
102.-04-05.0	301	Townsend St S & Fayette S		NR Eligible (SHPO)
102.-04-04.0	307	Townsend St S & Genesee S	Local Protected Site or Local District	NR Listed
103.-21-12.0	105	Townsend St S & Water St	Local Protected Site or Local District	
103.-21-11.0	109	Townsend St S To Block Al	Local Protected Site or Local District	
003.-22-15.0	805	Turtle St	Eligible/Architecturally Significant	
006.-02-02.0	802	Turtle St	Eligible/Architecturally Significant	
002.-23-13.0	419	Turtle St & Carbon St		NR Eligible (SHPO)
003.-23-11.0	715	Turtle St & Second North	Eligible/Architecturally Significant	
082.-09-02.0	304	Twin Hills Dr		NR Listed
082.-01-16.0	117-19	Twin Hills Dr	Eligible/Architecturally Significant	
082.-05-21.0	309	Twin Hills Dr		NR Listed
082.-05-22.0	305-07	Twin Hills Dr		NR Listed
082.-05-23.0	303	Twin Hills Dr		NR Listed
082.-09-01.0	300	Twin Hills Dr & Alanson R		NR Listed
082.-05-24.0	301	Twin Hills Dr & Alanson R		NR Listed
082.-06-05.0	213	Twin Hills Dr & Alanson R	Eligible/Architecturally Significant	
082.-06-16.0	235	Twin Hills Dr & Alanson R	Eligible/Architecturally Significant	
082.-01-15.0	121	Twin Hills Dr & Stinard A	Eligible/Architecturally Significant	
082.-06-03.0	209	Twin Hills Dr To Alanson	Eligible/Architecturally Significant	
082.-06-07.0	217	Twin Hills Dr To Alanson	Eligible/Architecturally Significant	
082.-06-08.0	219	Twin Hills Dr To Alanson	Eligible/Architecturally Significant	
082.-06-09.0	221	Twin Hills Dr To Alanson	Eligible/Architecturally Significant	
082.-06-11.0	225	Twin Hills Dr To Alanson	Eligible/Architecturally Significant	
082.-06-14.0	231	Twin Hills Dr To Alanson	Eligible/Architecturally Significant	
082.-07-13.0	228	Twin Hills Dr To Stinard		NR Listed
082.-07-14.0	230	Twin Hills Dr To Stinard		NR Listed
007.-32-02.0	404	Union Pl	Eligible/Architecturally Significant	
048.-12-07.1	412	University Ave & Madison St		NR Listed
050.-04-01.1/2	100	University Pl		NR Listed
050.-04-01.1	100	University Pl & College P		NR Listed
050.-04-01.2	100	University Pl & College P		NR Listed
069.-05-11.0	1648	Valley Dr		NR Eligible (SHPO)
069.-08-28.0	1826	Valley Dr		NR Eligible (SHPO)
065.1-01-05.0	1940-42	Valley Dr		NR Eligible (SHPO)
065.1-01-08.0	2500	Valley Dr		NR Eligible (SHPO)
065.1-01-11.0	2570	Valley Dr		NR Eligible (SHPO)
065.-02-05.0	1940-42	Valley Dr		NR Eligible (SHPO)
106.-10-08.0	309	Van Rensselaer St		NR Eligible (SHPO)
106.-11-26.0	314	Van Rensselaer St	Eligible/Architecturally Significant	
029.-11-13.0	342	Vine St & Hawley Ave & Sh	Eligible/Architecturally Significant	
049.-05-06.0	703	Walnut Ave	Local Protected Site or Local District	NR Listed

049.-06-05.0	803	Walnut Ave	NR Listed
049.-12-05.0	907	Walnut Ave	NR Listed
049.-12-06.0	905	Walnut Ave	NR Listed
049.-05-05.0	705	Walnut Ave & Adams St E	NR Listed
049.-06-02.0	801	Walnut Ave & Adams St E	NR Listed
049.-06-01.0	800	Walnut Ave & Adams St E &	NR Listed
049.-05-01.0	700	Walnut Ave & Harrison St	NR Listed
049.-05-02.0	701	Walnut Ave & Harrison St	NR Listed
049.-06-04.0	809	Walnut Ave & Marshall St	NR Listed
049.-12-01.0	900	Walnut Ave & Marshall St	NR Listed
049.-12-02.0	901	Walnut Ave & Marshall St	NR Listed
049.-06-03.2	805-07	Walnut Ave To Marshall St	NR Listed
049.-04-04.3	104	Walnut Pl	NR Listed
049.-04-04.4	106	Walnut Pl	NR Listed
049.-07-02.0	200-02	Walnut Pl	NR Listed
049.-07-03.0	206	Walnut Pl	NR Listed
049.-07-04.0	208	Walnut Pl	NR Listed
049.-11-02.0	304	Walnut Pl	NR Listed
049.-11-03.0	306	Walnut Pl	NR Listed
049.-11-04.0	308	Walnut Pl	NR Listed
049.-04-01.0	108-12	Walnut Pl & Adams St E	NR Listed
049.-04-04.2	102	Walnut Pl & Harrison St	NR Listed
049.-07-05.0	210	Walnut Pl & Marshall St	NR Listed
049.-11-01.0	300	Walnut Pl & Marshall St	NR Listed
049.-11-05.0	310	Walnut Pl & Waverly Ave	NR Listed
101.-03-12.0	216	Walton St	NR Listed
101.-04-09.0	120-24	Walton St	NR Listed
101.-04-10.0	130	Walton St	NR Listed
101.-04-11.0	134	Walton St	NR Listed
101.-04-13.0	136	Walton St	NR Listed
101.-15-03.0	219	Walton St	NR Listed
101.-15-04.0	215	Walton St	NR Listed
101.-14-01.1/101	133	Walton St #101	NR Listed
101.-14-01.1/102	133	Walton St #102	NR Listed
101.-14-01.1/103	133	Walton St #103	NR Listed
101.-14-01.1/104	133	Walton St #104	NR Listed
101.-14-01.1/105	133	Walton St #105	NR Listed
101.-14-01.1/106	133	Walton St #106	NR Listed
101.-14-01.1/107	133	Walton St #107	NR Listed
101.-14-01.1/108	133	Walton St #108	NR Listed
101.-14-01.1/109	133	Walton St #109	NR Listed
101.-14-01.1/110	133	Walton St #110	NR Listed
101.-14-01.1/111	133	Walton St #111	NR Listed
101.-14-01.1/112	133	Walton St #112	NR Listed
101.-14-01.1/113	133	Walton St #113	NR Listed
101.-14-01.1/114	133	Walton St #114	NR Listed
101.-14-01.1/115	133	Walton St #115	NR Listed
101.-14-01.1/116	133	Walton St #116	NR Listed
101.-14-01.1/117	133	Walton St #117	NR Listed
101.-14-01.1/118	133	Walton St #118	NR Listed
101.-14-01.1/119	133	Walton St #119	NR Listed
101.-14-01.1/120	133	Walton St #120	NR Listed
101.-14-01.1/121	133	Walton St #121	NR Listed
101.-14-01.1/122	133	Walton St #122	NR Listed
101.-14-01.1/123	133	Walton St #123	NR Listed
101.-14-01.1/124	133	Walton St #124	NR Listed
101.-14-01.1/125	133	Walton St #125	NR Listed
101.-14-01.1/126	133	Walton St #126	NR Listed
101.-14-01.1/127	133	Walton St #127	NR Listed
101.-14-01.1/128	133	Walton St #128	NR Listed
101.-14-01.1/129	133	Walton St #129	NR Listed
101.-14-01.1/130	133	Walton St #130	NR Listed
101.-14-01.1/131	133	Walton St #131	NR Listed
101.-14-01.1/132	133	Walton St #132	NR Listed

101.-14-01.1/142	133	Walton St #134		NR Listed
101.-14-01.1/135	133	Walton St #135		NR Listed
101.-14-01.1/136	133	Walton St #136		NR Listed
101.-14-01.1/137	133	Walton St #137		NR Listed
101.-14-01.1/138	133	Walton St #138		NR Listed
101.-03-10.0	200	Walton St & Franklin St S		NR Listed
101.-03-11.0	212-14	Walton St To Fayette St W		NR Listed
102.-01-11.0	349	Warren St S	Eligible/Architecturally Significant	NR Listed
102.-01-12.0	325-45	Warren St S		NR Listed
102.-14-07.0	451	Warren St S	Eligible/Architecturally Significant	NR Listed
102.-14-08.0	443	Warren St S		NR Listed
102.-14-09.0	437-41	Warren St S	Local Protected Site or Local District	NR Listed
102.-14-10.0	431-35	Warren St S	Local Protected Site or Local District	NR Listed
102.-14-11.0	421-25	Warren St S		NR Listed
102.-01-10.0	351-53	Warren St S		NR Listed
104.-25-02.0	214-20	Warren St S & Fayette St	Eligible/Architecturally Significant	NR Listed
101.-07-02.0	300-04	Warren St S & Fayette St E		NR Listed
102.-14-14.0	401-07	Warren St S & Jefferson S		NR Listed
101.-07-06.0/1	352-68	Warren St S & Jefferson S		NR non-contributing
104.-25-01.0	208	Warren St S & Washington		NR Listed
101.-07-04.1	312-44	Warren St S To Bank Alley		NR Listed
101.-07-04.2	312-44	Warren St S To Bank Alley & Fa		NR Listed
030.-23-02.0	1010	Washington St E	Local Protected Site or Local District	
103.-18-01.0	233	Washington St E & Montgom	Local Protected Site or Local District	NR Listed
103.-21-09.0	501	Washington St E & Townsen	Local Protected Site or Local District	NR Eligible (SHPO)
103.-28-03.1	208	Washington St E & Warren		NR Listed
103.-17-01.0	246-48	Water St E		NR Listed
103.-17-02.0	250	Water St E		NR Listed
103.-16-01.0	257	Water St E & Montgomery S		NR Listed
103.-17-04.0	258	Water St E & Montgomery S		NR Listed
104.-17-06.0	101-13	Water St E & Salina St S	Local Protected Site or Local District	NR Listed
103.-15-01.0	327-35	Water St E & State St S &		NR Listed
103.-16-07.0	203	Water St E & Warren St S	Local Protected Site or Local District	NR Listed
104.-17-01.0	135	Water St E & Warren St S	Local Protected Site or Local District	NR Listed
103.-15-02.0	325	Water St E To Erie Blvd E	Eligible/Architecturally Significant	NR Listed
103.-15-04.0	319-21	Water St E To Erie Blvd E		NR Listed
103.-15-05.0	311-17	Water St E To Erie Blvd E		NR Eligible (SHPO)
103.-16-02.0	251	Water St E To Erie Blvd E		NR Listed
103.-16-03.0	243-49	Water St E To Erie Blvd E		NR Listed
103.-16-04.0	239	Water St E To Erie Blvd E		NR Listed
103.-16-05.0	235	Water St E To Erie Blvd E		NR Listed
103.-16-06.0	207-33	Water St E To Erie Blvd E		NR Listed
104.-17-03.1	125-31	Water St E To Erie Blvd E	Local Protected Site or Local District	NR Listed
104.-17-04.0	123	Water St E To Erie Blvd E	Local Protected Site or Local District	NR Listed
104.-17-05.0	119-21	Water St E To Erie Blvd E	Local Protected Site or Local District	NR Listed
104.-19-03.2	208	Water St W To Erie Blvd W		NR Listed
104.-19-03.3	204	Water St W To Erie Blvd W		NR Listed
049.-12-04.0	305	Waverly Ave & Walnut Ave		NR Listed
018.-10-01.1	204-08	Wayne St		NR Listed
018.-10-03.0	210	Wayne St		NR Listed
018.-10-04.0	212	Wayne St		NR Listed
018.-11-12.0	126	Wayne St		NR Eligible (SHPO)
018.-11-13.0	128	Wayne St	Eligible/Architecturally Significant	
080.-11-54.0	306	Wellesley Rd		NR Eligible (SHPO)
080.-11-55.0	308	Wellesley Rd		NR Eligible (SHPO)
080.-11-56.0	310	Wellesley Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-11-57.0	312	Wellesley Rd		NR Eligible (SHPO)
080.-11-58.0	314	Wellesley Rd		NR Eligible (SHPO)
080.-11-59.0	316	Wellesley Rd		NR Eligible (SHPO)
080.-11-60.0	318	Wellesley Rd		NR Eligible (SHPO)
080.-11-61.0	320	Wellesley Rd		NR Eligible (SHPO)
080.-11-62.0	322	Wellesley Rd		NR Eligible (SHPO)
080.-11-63.0	324	Wellesley Rd		NR Eligible (SHPO)
080.-11-64.0	326	Wellesley Rd		NR Eligible (SHPO)

080.-11-65.0	328	Wellesley Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
080.-08-07.0	100	Wellesley Rd		NR Listed
080.-08-08.0	102	Wellesley Rd		NR Listed
080.-08-09.0	104	Wellesley Rd		NR Listed
080.-08-10.0	106	Wellesley Rd		NR Listed
080.-08-11.0	108	Wellesley Rd		NR Listed
080.-08-12.0	110	Wellesley Rd		NR Listed
080.-09-02.0	202	Wellesley Rd		NR Listed
080.-09-03.0	204	Wellesley Rd		NR Listed
080.-09-04.0	206	Wellesley Rd		NR Listed
080.-09-05.0	208	Wellesley Rd		NR Listed
080.-09-06.0	210	Wellesley Rd		NR Listed
079.-22-69.0	329	Wellesley Rd		NR Eligible (SHPO)
079.-22-70.0	327	Wellesley Rd		NR Eligible (SHPO)
079.-22-71.0	325	Wellesley Rd		NR Eligible (SHPO)
079.-22-72.0	323	Wellesley Rd		NR Eligible (SHPO)
079.-22-73.0	321	Wellesley Rd		NR Eligible (SHPO)
079.-22-74.0	319	Wellesley Rd		NR Eligible (SHPO)
079.-22-75.0	317	Wellesley Rd	Eligible/Architecturally Significant	NR Eligible (SHPO)
079.-22-76.0	315	Wellesley Rd		NR Eligible (SHPO)
079.-22-77.0	313	Wellesley Rd		NR Eligible (SHPO)
079.-22-78.0	311	Wellesley Rd		NR Eligible (SHPO)
079.-22-79.0	309	Wellesley Rd		NR Eligible (SHPO)
079.-22-80.0	307	Wellesley Rd		NR Eligible (SHPO)
079.-01-14.0	111	Wellesley Rd		NR Listed
079.-01-15.0	109	Wellesley Rd		NR Listed
079.-01-16.0	107	Wellesley Rd		NR Listed
079.-01-17.0	105	Wellesley Rd		NR Listed
079.-01-18.0	103	Wellesley Rd		NR Listed
079.-01-19.0	101	Wellesley Rd		NR Listed
079.-04-15.0	213	Wellesley Rd		NR Listed
079.-04-16.0	211	Wellesley Rd		NR Listed
079.-04-17.0	209	Wellesley Rd		NR Listed
079.-04-18.0	207	Wellesley Rd		NR Listed
079.-04-19.0	205	Wellesley Rd		NR Listed
079.-04-20.0	203	Wellesley Rd		NR Listed
080.-09-07.0	212	Wellesley Rd		NR Listed
080.-11-66.0	330	Wellesley Rd		NR Eligible (SHPO)
080.-11-67.0	332	Wellesley Rd		NR Eligible (SHPO)
079.-01-01.0	99	Wellesley Rd & & Colvin S		NR Listed
080.-08-13.0	112	Wellesley Rd & Charmouth		NR Listed
080.-09-01.0	200	Wellesley Rd & Charmouth		NR Listed
079.-01-13.0	113	Wellesley Rd & Charmouth		NR Listed
079.-04-21.0	201	Wellesley Rd & Charmouth		NR Listed
079.-22-81.0	329	Wellesley Rd Rear		NR Eligible (SHPO)
014.-07-02.0	121	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-03.0	119	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-04.0	115	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-05.0	111	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-06.0	109	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-07.0	107	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-08.0	101	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-24.0	100	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-25.0	102-04	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-26.0	106	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-27.0	108	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-28.0	110	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-29.0	116	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-30.0	118	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-08-31.0	120	Wendell Terr	Local Protected Site or Local District	NR Eligible (SHPO)
014.-07-01.0	123-25	Wendell Terr & Rugby Rd	Local Protected Site or Local District	NR Eligible (SHPO)
096.-11-01.0	819	West St S	Local Protected Site or Local District	NR Eligible (SHPO)
101.-01-06.1	201	West St S & Fayette St W	Eligible/Architecturally Significant	
096.-14-05.0	818	West St S & Shonnard St	Local Protected Site or Local District	

101.-19-13.0	621	West St S To Mccormick Av	Eligible/Architecturally Significant	
037.-22-34.0	457	Westcott St		NR Eligible (SHPO)
037.-22-49.0	329	Westcott St		NR Listed
046.-06-08.0	524-532	Westcott St	Eligible/Architecturally Significant	
052.-07-34.0	1014	Westcott St		NR Eligible (SHPO)
110.-19-06.0	333	Whittier Ave	Eligible/Architecturally Significant	
110.-09-03.1	102-18	Wilbur Ave S & Tompkins	Eligible/Architecturally Significant	NR Eligible (SHPO)
105.-01-27.0	416	Wilkinson St	Eligible/Architecturally Significant	
112.-02-26.0	1009	Willis Ave	Eligible/Architecturally Significant	
111.-03-18.0	604	Willis Ave	Eligible/Architecturally Significant	
112.-03-31.0	1022	Willis Ave & Chemung St	Eligible/Architecturally Significant	
111.-03-20.0	608-10	Willis Ave & Erie St	Eligible/Architecturally Significant	
017.-17-12.0	635	Willow St E	Eligible/Architecturally Significant	
104.-05-01.0	123-29	Willow St E	Eligible/Architecturally Significant	NR Eligible (SHPO)
104.-09-08.0	230	Willow St W		NR Listed
052.-16-02.0	108	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-16-03.0	114	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-16-04.0	116	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-16-05.0	118	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-16-06.0	120	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-17-15.0	121	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-17-16.0	119	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-17-17.0	111	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-17-18.0	107	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-17-19.0	103	Windsor Pl	Local Protected Site or Local District	NR Listed
052.-17-14.0	123	Windsor Pl & Berkeley Dr	Local Protected Site or Local District	NR Listed
052.-17-20.0	101	Windsor Pl & Terrace Rd	Local Protected Site or Local District	NR Listed
052.-16-01.0	100	Windsor Pl & Terrace Rd &	Local Protected Site or Local District	NR Listed
019.-23-01.0	629	Winton St & Herbst Ave	Eligible/Architecturally Significant	
088.-03-13.0	150	Wolcott Ave	Eligible/Architecturally Significant	
088.-18-10.0	504	Wolcott Ave	Eligible/Architecturally Significant	
081.-02-03.0	600	Wolcott Ave & Fairdale Av	Eligible/Architecturally Significant	
088.-18-13.0	518	Wolcott Ave & Fairdale Av	Eligible/Architecturally Significant	
002.-12-02.0	224	Wolf St	Eligible/Architecturally Significant	
002.-12-08.0	252	Wolf St	Eligible/Architecturally Significant	
002.-03-01.0	229	Wolf St	Eligible/Architecturally Significant	
002.-03-02.0	225	Wolf St		NR Eligible (SHPO)
002.-03-03.0	217-21	Wolf St	Eligible/Architecturally Significant	
002.-04-10.0	301	Wolf St & Park St		NR Eligible (SHPO)
002.-12-10.1	242-60	Wolf St & Park St	Eligible/Architecturally Significant	
002.-03-04.0	201	Wolf St & Salina St N	Eligible/Architecturally Significant	

Appendix E

Response to DGEIS Public Comments

Appendix E – Response to DGEIS Public Comments

Complete text of written comments and a transcript including all comments expressed at the February 12, 2020 public information meeting are provided in Attachment A with page numbers noted below in the Comment Identification Table.

Comment Identification Table

Public Comment #	Name	Affiliation	Format	Date	Page #
1	Peggy Liuzzi	Resident	Written	2/20/2020	E-A-1
2	Jesse Harasta	Cazenovia College	Written	2/11/2020	E-A-2
3	Patrick E. Strodel	LeadSafe LLC	Written	2/5/2020, 2/6/2020	E-A-20
4	Daniel Izzo	Resident	Written	2/6/2020	E-A-22
5	Jamie Howley	TNT Southside Housing Taskforce	Written	2/13/2020	E-A-23
6	David Michel	Housing Visions	Written	2/12/2020	E-A-24
7	Adam L. Wekstein	Hocherman Tortorella & Wekstein	Written	3/2/2020	E-A-26
8	Travis Hobart and Elizabeth Domachowske	Central/Eastern New York Lead Poisoning Resource Center	Written	3/5/2020	E-A-30
9	Mary Cunningham	Resident	Written	3/4/2020	E-A-33
10	Ellen Morrissey	Families for Lead Freedom Now	Written	3/4/2020	E-A-34
11	Leslie Paul Luke	St. Joseph's Hospital	Written	3/3/2020	E-A-35
12	Margaret Bombard	Resident	Written	3/3/2020	E-A-36
13	Mary Carney	Resident	Written	2/29/2020	E-A-38
14	Feruzi Murairi	Resident	Written	2/24/2020	E-A-39
15	Letitia James, Marissa Lieberman-Klein, and Jennifer Nalbone	New York State Attorney General's Office	Written	3/5/2020	E-A-40
16	Aggie Lane	Resident	Written	2/25/2020	E-A-46
17	Peter	Resident	Written	2/26/2020	E-A-47
18	William J. Scott	Syracuse Teachers Association	Written	2/5/2020	E-A-48
19	Richard Puchalski	Syracuse United Neighbors	Written	3/3/2020	E-A-49
20	Peter King	Resident	Written	3/5/2020	E-A-51
21	Ellen Morrissey, Feruzi Arnold, Oceanna Fair, Aurora Pille, Bonfrida Kakwaya, Gabriel Mkandama, Darlene Medley	Families for Lead Freedom Now!	Written	2/25/2020	E-A-54
22	Jamie Hauley	TNT Southside Housing	Public Info Mtg	2/12/2020	E-A-78
23	Palmer Harvey	TNT Southside Housing	Public Info Mtg	2/12/2020	E-A-78
24	Jeanette Zoeckler	SUNY Upstate Medical	Public Info Mtg	2/12/2020	E-A-79
25	Jesse Harasta	Cazenovia College	Public Info Mtg	2/12/2020	E-A-80
26	Oseanna Fair	Families for Lead Freedom	Public Info Mtg	2/12/2020	E-A-80
27	Charlene Fair	Resident	Public Info Mtg	2/12/2020	E-A-81
28	Matracia Powell	Democratic Socialists	Public Info Mtg	2/12/2020	E-A-81
29	David Michel	Housing Visions	Public Info Mtg	2/12/2020	E-A-81
30	Peter Knoblock	ACTS	Public Info Mtg	2/12/2020	E-A-82
31	Marianna Kaufmann	CNY Solidarity	Public Info Mtg	2/12/2020	E-A-82

32	Crystal Cosentino	Home Headquarters	Public Info Mtg	2/12/2020	E-A-82
33	Bobby Carroll	Resident	Public Info Mtg	2/12/2020	E-A-83
34	Mary Cunningham	Resident	Public Info Mtg	2/12/2020	E-A-84
35	Evan Brzostowski	American Iron Front	Public Info Mtg	2/12/2020	E-A-84
36	Nathan Currier	American Iron Front and SRA	Public Info Mtg	2/12/2020	E-A-84
37	Mary Traynor	Syracuse Tenants Union	Public Info Mtg	2/12/2020	E-A-85
38	Greg Smith	Resident	Public Info Mtg	2/12/2020	E-A-85
39	Stephanie Kenefic	Socialism & Liberation	Public Info Mtg	2/12/2020	E-A-86
40	Rich Puchalski	Syracuse United Neighbors	Public Info Mtg	2/12/2020	E-A-86
41	Brendan Brooks	Interfaith LLC	Public Info Mtg	2/12/2020	E-A-87
42	Peter King	Resident	Public Info Mtg	2/12/2020	E-A-87

RESPONSE TO PUBLIC COMMENTS

Public Comment 1. Peggy Liuzzi

Comment 1A: (Summary) The commenter expresses support for the proposed lead ordinance, citing the dangers unmitigated lead has on children. Reducing the number of children exposed to lead may be one of the most important tools available to support school success and poverty in the City of Syracuse. Syracuse is a city that has shown it can work with partners to take on big, complex problems and implement effective solutions. Childhood lead poisoning is one of those problems. Syracuse has built a coalition of ready community partners willing to help. Please ensure that Syracuse City government has the tools it needs to play a leadership role in protecting children from the terrible damage of environmental lead exposure."

Response 1A: ***Comment is noted.***

Public Comment 2. Jesse Harasta, PhD

Comment 2A: The commenter conducted a study in Fall of 2019 analyzing the microgeography of the City to determine the factors that influence high cases of lead poisoning. Their research indicates that the proposed legislation is necessary, though likely insufficient.

Response 2A: ***Comment is noted.***

Comment 2B: The written standards in the Ordinance fail to meet the current federal standards set by HUD and EPA for detecting dust-lead hazards through the use of dust-wipe sampling. In the ordinance, Section 54-7(D) "Clearance Standards," section (1) gives three values for dust sample results: (a) For floors: 40 $\mu g/ft^2$ (40 micro-grams per square foot): (b) For windowsills: 250 $\mu g/ft^2$; (c) For window troughs: 400 $\mu g/ft^2$. However, effective January 6, 2020, both the Environmental Protection Agency and the Department of Housing and Urban Development revised those standards to make them more stringent and more effective in clearing a dwelling. The new dust-lead hazard standards are as follows: (a) For floors: 10 $\mu g/ft^2$; (6) For windowsills: 100 $\mu g/ft^2$. The Ordinance should be revised at Section 54-7(D) to meet EPA/HUD standards. Also, make the window trough standard more stringent - it should be lowered to 100 $\mu g/ft^2$.

Response 2B: ***Comment is noted. Because the comment is legal in nature or relates to construction of the Draft Ordinance, it extends beyond the scope of public comment on the DGEIS and the City is not obligated to address it at this time. The City will be accepting public comments on the Draft Ordinance at a future date.***

As a courtesy, the updated Draft Ordinance (Appendix A) includes updated Section 54-7(D) clearance standards aligning with current EPA/HUD threshold levels as described in 40 CFR 765.

Comment 2C: There are several points that allow landlords to pass substandard work off or to delay work for an unacceptable period. 54-6-B allows the inspector to release the property if "interim controls have been implemented", but interim controls are by their nature temporary; similarly 54-11- B allows for a delay of exterior abatement because of inclement weather, but does not recognize that inclement weather can last for months while children are still being exposed. 54-8-A states that abatement work must be done by someone with the proper EPA certification, but has a loophole for work done by the landlord or unpaid family members of the landlord. Do not allow for inspectors to release properties when only interim controls are in place. Require the placement of interim controls in the case of weather of over a week. Remove the loophole for abatement work done by landlord or unpaid family members.

Response 2C: ***See Response 2B regarding comments of a legal nature or which relate to construction of the Draft Ordinance.***

As a courtesy, the City offers the following response: Section 2.2 of the DGEIS identifies the conditions and actions which require the performance of a lead inspection. Relative to landlords/rental properties, inspection is required upon renewal applications for the Rental Registry and Certificates of Compliance for rental properties at three-year intervals, as well as in response to the filing of a complaint. Insufficient abatement measures may be reported at any time, and periodic inspections are intended to ensure that owners maintain ongoing compliance as property conditions may change over time.

Comment 2D: The bill defines its goal is to create “permanent” protection from lead. Just as the only safe level of lead in the blood is having no lead in the blood, the only true permanent solution is the removal of lead from walls and soils. But the bill defines “permanent” as lasting 20 years. Yet, we know that no painted porch surface lasts twenty years in Syracuse. This means that buildings who have been encapsulated are exempt permanently from the Ordinance’s oversight, yet the

“permanent encapsulation” of porches may only last a few years. Definitions of “permanent” and “encapsulation” are found in 54-2. Redefine "permanent" as lead remediation: the permanent removal walls or soil bearing lead paint. Define "encapsulation" as "abatement," and require properties through paint encapsulation be returned to the oversight of the bill with the following language: "given environmental conditions from Syracuse weather, houses remediated via paint encapsulation shall continue to be inspected every 6 years."

Response 2D: ***See Response 2B regarding comments of a legal nature that relate to construction of the Draft Ordinance. As a courtesy, the City offers the following response.***
The purpose and need for the Ordinance as described in the GEIS is as follows:

> ***The need for a lead ordinance is based on the significant impact that lead exposure has on residents, especially children. The City of Syracuse Proposed Lead Ordinance's main objective is to reduce the rate of lead exposure in the City.***

The Draft Ordinance provides mechanisms to ensure ongoing compliance as property conditions may change over time. The term “permanent” as used in the GEIS relates to lead abatement and is defined by EPA/HUD regulations.

Comment 2E: There are two alternative versions of the bill. One (Alternative 1) is significantly stronger and the other (Alternative 2) is weaker and would not have sufficient strength to deal with the crisis. Alternative 1 includes dust wipe sampling. Dust from lead paint is a major contributor to lead poisoning and should be included in any lead ordinance. Alternative 2 is similar to Alternative 1 except that there is NO dust wipe sampling in Alternative 2. Alternative 2 would be a much weaker choice of Ordinance for protecting children. Under Alternative 1, lead wipe sampling will occur in those areas defined as "high risk". Lead dust wipe sampling is a more comprehensive inspection as compared to visual inspection alone. Dust wipe sampling can identify small particles of lead contaminated dust not visible to the naked eye.

Response 2E: ***Per DGEIS Section 2.2, visual assessments performed in designated “high risk” areas will include dust wipe sampling. This aligns with Alternative #1 as described in Section 1.5.***

Comment 2F: Currently information about abatement and violations is publicly available but only to those who can come in to the office during business hours. This is not sufficient transparency when affordable digital options are available. Section 3.3.2.1 "Property Transfer and Notification" (pp., 43-44) states the following: *"...the City will maintain a database, accessible to the public, of all residential properties where lead hazards have been identified, reduced and controlled…The City shall further maintain a database of all residential properties granted a certificate of occupancy. These databases will be available to "walk-in" inspection by the public."* Why are these two databases only available for walk-in inspection? Why shouldn't residents have access to his information about safety (HUD work is public dollars) and licensing of rental units (a public action)? It is recommended to make the data not just public, but to place it in an electronic database.

Response 2F: ***DGEIS Section 3.3.2.1 identifies federal notification and disclosure requirements for property rental and sales transactions. City databases will be made available to the public on a walk-in basis and there will be no requirement for Freedom of Information requests in order to access database information. Information regarding all code violations including lead-related violations will continue to be made publicly available through the Syracuse Open Data online portal.***

Comment 2G: Incomplete definitions for Commissioner, Director, and Department. The ordinance does not provide definitions for these key terms and it is possible that this could lead to legal challenges that defeat the Syracuse Lead Ordinance in a court of law. The ordinance does not provide definitions for these key terms and it is possible that this could lead to legal to challenges that defeat the Syracuse Lead Ordinance in a court of law. Section 54-7 (I)(7) refers to "Commissioner"; however, Commissioner lacks mention in Section 54-2, leaving the term meaningless in the ordinance legislation. Sections 54-4(D), 54-5(a), and 54-7(H) refer to an entity called "Department." However, "Department" is undefined in Section 54-2, DEFINITIONS, and, in spite of contextual material in the ordinance, the word is extremely unclear, if not meaningless in each of those references. The term "Director" is mentioned in 54-2 (in the process of defining the term CERTIFIED); 54-7(H), and; 54-7(I) (1 through 7). However, the term is undefined in Section 54-2, DEFINITIONS, and its meaning cannot be understood in context (except that its capitalization distinguishes it from "director") and is practically meaningless. To avoid legal challenges on this simple point, clearly define, in Section 54-4, the terms "commissioner", "director", and "department".

Response 2G: ***See Response 2B regarding comments of a legal nature or which relate to construction of the Draft Ordinance. As a courtesy, the City notes that these definitions are included in Section 54-2 of the updated Draft Ordinance (Appendix A).***

Comment 2H: Protection for tenants against retaliation is below NYS legal standards. New York law regarding tenancy changed in 2019 and this ordinance reflects the old standard. Section 54-13 should be strengthened to protect tenants. Specifically, 54-13 (B) only grants protection for six months while current NYS law (passed after the Rochester version of this bill) gives a full year of protection including for circumstances specifically exempted from this law. In Section 54-13 (B) the text should change the time period for the rebuttal presumption for six months to one year, to be consistent with NYS law (see: https:/www.nysenate.gov/legislation/laws/RPP/223-B). It should also be made stronger to protect tenants from retaliation (for one year) if they contact the Onondaga County or NYS Department of Health in connection with concern over childhood lead poisoning. Language that should be stronger would be to use the phrase "any governmental agency (City or County or State)": "There shall be a rebuttable presumption that any attempt... to evict a tenant within one year after any report to <u>any governmental agency (City or County or State)</u> or the owner or any enforcement action in connection with...." Additionally, because of the many challenges to the warranty of habitability of many Syracuse rental units, for which tenants often withhold rent to encourage a landlord to make proper repairs, Section 54-13 (B) should strike the phrase: "except that in instances of nonpayment of rent".

Response 2H: ***See Response 2B regarding comments of a legal nature or which relate to construction of the Draft Ordinance. As a courtesy, the City notes that Section 54-13 (B) of the updated Draft Ordinance (Appendix A) has been revised to extend the rebuttal presumption time period from six months to one year. The Draft Ordinance remains subject to revision, and New York State law remains applicable even if not directly referenced or included in the Draft Ordinance.***

Comment 2I: Section 1.1 of the Executive Summary states that the 2018 numbers for cases of new poisoning is 446 (or 10.47%). These numbers are correct, but are significantly lower than previous years. The most likely reason for this decrease was fewer children tested, rather than an actual decrease in the number of new poisonings. It is better to use the 5 year average poisoning, rather than the most recent year. This issue also underlines the need for universal testing,

including a reinstatement of WIC testing; without a continuation of previous testing standards, there can be no way to determine whether this ordinance will be effective.

Response 2I: ***Comment is noted.***

Comment 2J: In Section 1.1 of the Executive Summary, the discussion of costs to the tax payer and New York State is based upon the 2003 Swindburn study. While this study has usefulness because it is focused upon New York, it is currently 17 years old. A more recent (2016) study worth looking at is the Michigan Network for Children's Environmental Health entitled "Costs of Lead Exposure and Remediation in Michigan: Update". This study includes all of the same costs as the New York study, but also includes other factors including: the treatment of ADHD 21.1% of children with ADHD in Michigan have EBLLs), includes estimates of adult crime that occur at higher rates among those poisoned as children (the New York study focuses only upon youth crime), and argues that an average of nine years (rather than three in the New York study) of special education is more realistic for poisoned children. All of these factors point to the argument that the Swindburn study underestimated the social costs of lead poisoning.

Response 2J: ***Comment is noted.***

Comment 2K: [Draft Ordinance Section] 54-1-J: While it is useful to estimate the cost of the legislation on the city's rental housing market, it would also be useful to estimate the potential cost to the City and its residents for inaction. In the introduction to the Draft GEIS, it is estimated that "New York State may have observed loss of nearly $78 million in tax dollars" from lack of future earning alone. This does not include the "need for special education" or "additional tax payer costs associated with criminal activity". Unfortunately, the Draft GEIS does not go further with local estimates.

Response 2K: ***See Response 2B regarding comments of a legal nature or which relate to construction of the Draft Ordinance.***

As a courtesy, the City offers the following response: Section 1.1 of the DGEIS discusses a study conducted by Professor Katrina Smith Korfmacher which assesses the economic impacts of lead poisoning in New York State. The DGEIS does not estimate economic impacts at the local level, however such impacts are likely to be qualitatively similar to those described in Section 1.1.

Comment 2L: [Draft Ordinance Section] 54-7-D-1: Minimum lead dust sample results listed are all well above the established threshold for safe lead exposure which is 0 µg. There is no safe level of lead.

Response 2L: ***See Response 2B.***

Comment 2M: [Draft Ordinance Section] 54-2: The definition of "permanent" is a 20-year encapsulation. Encapsulation involves covering, not removing, lead and should never be considered to be permanent. Even if one is willing to consider a 20-year encapsulation to be "permanent," it is clear that exterior paint in Syracuse - especially the crucially important front porch paint never lasts anywhere close to twenty years. We run the risk of having buildings noted as "permanently" repaired and removed from the purview of the bill and then once again becoming the source of poisoning in four or five years' time when the porch begins to peel.

Response 2M: ***See Response 2B regarding comments of a legal nature or which relate to construction of the Draft Ordinance. As a courtesy in response to this comment, the City notes that the term "permanent" as used in the DGEIS relates to lead abatement and is defined by EPA/HUD regulations.***

Comment 2N: [Draft Ordinance Section] 54-6-B: This section allows for a "violation...to be removed" if "interim controls have been implemented". However, under the earlier definition of interim control it notes that they are "measures designed to temporarily reduce human exposure". While this may be an important tool, a "temporary" solution does not meet the Ordinance's standard of "permanency." If it is possible for inspectors to remove violations for interim controls, there will be no way to ensure that permanent treatments will ever be established.

Response 2N: ***Comment is noted. Because the comment is legal in nature or relates to construction of the Draft Ordinance, it extends beyond the scope of public comment on the DGEIS and the City is not obligated to address it at this time. The City will be accepting public comments on the Draft Ordinance at a future date.***

Comment 2O: [Draft Ordinance Section] 54-7-B-3-A: Why is there a limit of "no more than four rooms"? Why not allow inspectors to determine the number of rooms based upon their judgement with a minimum of four rooms including one bedroom and the living room?

Response 2O: ***See Response 2N.***

Comment 2P: [Draft Ordinance Section] 54-7-H: No timeline is given during which the complaints of tenants can be heard.

Response 2P: ***See Response 2N. As a courtesy in response to the comment, the City notes that it will provide guidance on procedures for the filing of complaints prior to the Ordinance taking effect.***

Comment 2Q: [Draft Ordinance Section] 54-7-D-1: These thresholds are out of date and too high.

Response 2Q: ***See Response 2B.***

Comment 2R: [Draft Ordinance Section] 54-8-A: This section states that "any home improvement contractor, property management firm, handyman, or other person compensated for renovation work…Must possess an EPA RRR certification." Many landlords – or their uncompensated family members – handle maintenance on their properties. I would suggest the language here be altered to also include property owners and to replace the term "compensated for renovation work" with "other person, compensated or not, who completes renovation work".

Response 2R: ***See Response 2N. As a courtesy in response to the comment, the reference to compensation has been removed from Section 54-8(A) of the updated Draft Ordinance (Appendix A).***

Comment 2S: [Draft Ordinance Section] 54-8-C: If the ordinance requires that the precise language of the sign be provided in both English and Spanish, why not provide the Spanish translation as well? This would save landlords paying for translation and potentially providing poorly translated information. We also suggest the use of visual images depicting poison toxins in order to convey the message to the speakers of any of Syracuse's dozens of other languages.

Response 2S: ***See Response 2N. As a courtesy in response to the comment, the City notes that it will address topics related to translation prior to the Ordinance taking effect.***

Comment 2T: [Draft Ordinance Section] 54-8-D-1: Like in 54-8-C, why not provide the Spanish text as well as the English text? In addition, the final sentence of the letter reads "Retaliatory action against tenants is prohibited by 54-13 of the Municipal Code". This sentence could be re-written to be more user friendly and to assist tenants in understanding their rights. A potential rewrite could be: "It is unlawful for a building owner, or any person acting on his or her behalf, to take any retaliatory action toward a tenant who reports a suspected lead-based paint hazard to the owner or to the City. This includes rent increases, non-renewals of leases or interference with the occupants' use of the property." This language is drawn from Section 54-13 of the bill.

Response 2T: ***See Responses 2N and 2S.***

Comment 2U: [Draft Ordinance Section] 54-9: This section is misnumbered. It is listed as "55-9".

Response 2U: ***See Response 2N. As a courtesy, section numbering has been updated in the revised Draft Ordinance (Appendix A).***

Comment 2V: [Draft Ordinance Section] 54-9-A-2: There is no standard here for where the tenants will be put up nor an explicit statement that this will be done at no cost to them.

Response 2V: ***See Response 2N.***

Comment 2W: [Draft Ordinance Section] 54-9-A-2-D: This exemption is confusingly written and could be strongly disruptive to tenants' lives. There is too much opportunity for landlord abuse as the standards of "safe daily access" are not defined.

Response 2W: ***See Response 2N.***

Comment 2X: [Draft Ordinance Section] 54-9-A-4: This section does not account for the fact that work may be completed but done to unfit standards. We recommend altering the first sentence to read: "In addition to the protections afforded elsewhere by law, if interior hazard reduction activities will not be or are not completed within 60 calendar days, or are completed but fail to pass inspection within 60 days, occupants..."

Response 2X: ***See Response 2N. As a courtesy, the revised Draft Ordinance (Appendix A) provides updated language in Section 54-9-A-4.***

Comment 2Y: [Draft Ordinance Section] 54-11-B: This section allows for a delay of abatement because of weather conditions. However, inclement weather that prevents exterior painting in Syracuse can last for months. Instead, we recommend that the bill require the implementation of “interim controls" under its own definition after a maximum delay of a week for inclement weather.

Response 2Y: ***See Response 2N.***

Comment 2Z: [Draft Ordinance Section] 54-13-A: The protections from retaliation are too constrained as they only protect against reporting of suspected lead to "the owner or the City". We suggest expanding this to include the County Department of Health, their medical practitioner, and legitimate researchers and journalists.

Response 2Z: ***See Response 2N. As a courtesy, the City notes that Section 54-13-A of the updated Draft Ordinance (Appendix A) has been updated to list the Onondaga County Department of Health and medical practitioners, and tenant protections would apply to tenants reporting suspected lead-based paint hazards to these parties.***

Comment 2Aa: [Draft Ordinance Section] 54-13-C: The section that reads "tenancy was terminated pursuant to the terms of a lease as a result of a bona fide transfer of ownership" leaves open the very real, and very common, practice of landlords moving properties between various anonymous LLCs that they wholly own. Until we can ensure complete knowledge of the ownership of all LLCs, we can never guarantee "bona fide transfer of ownership". Therefore, this clause should be removed.

Response 2Aa: ***See Response 2N.***

Comment 2Ab: [Draft Ordinance Section] 54-14: The incorrect chapter is included in this section, it should refer to "54-4", not "45-4"

Response 2Ab: ***See Response 2N. As a courtesy, the section reference has been updated in the revised Draft Ordinance (Appendix A).***

Comment 2Ac: 54-15-B: Why is public access only available through walk-ins? Why not start in the digital age with an online database from day one?

Response 2Ac: ***See Response 2F.***

Public Comment 3. <u>Patrick E. Strodel</u>

Comment 3A: Summary: Comments are in regard to Appendix A. In section 54-2, the definition of "dust-lead hazard" refers the reader to 54-7D and the levels listed there are incorrect. EPA reduced the hazard levels effective 1/6/2020 to Floors – 10 µg/ft^2, windowsills – 100 µg/ ft^2. The dust clearance levels were left unchanged so the levels at 54-7 are correct for clearance only.

Response 3A: ***See Response 2B.***

Comment 3B: The definition of "encapsulation" should be revised. Change the first sentence to "The application of a coating or adhesively bonded material or coating…" to eliminate the word "covering" to avoid confusion.

Response 3B: ***See Response 2N. As a courtesy, the definition of "encapsulation" is updated per HUD/EPA definition in the revised Draft Ordinance provided as Appendix A.***

Comment 3C: The definition of "HEPA Vacuum" should be replaced in its entirety with *"A vacuum cleaner which has been designed with a high-efficiency particulate air (HEPA) filter as the last filtration stage/ A HEPA filter is a filter that is capable of capturing particulates of 0.3 microns with 99.97% efficiency. The vacuum cleaner must be designed so that all the air drawn into the machine is expelled through the HEPA filter with none of the air leaking past it. HEPA vacuums must be operated and maintained in accordance with the manufacturer's instructions."*

Response 3C: ***See Response 2N. As a courtesy, the definition of HEPA vacuum is revised per HUD/EPA in the updated Draft Ordinance provided as Appendix A.***

Comment 3D: The definition of "lead-based paint" should be revised to append the following sentence to the end: "*Unless the federal standard is lowered, then the more stringent level shall apply*." EPA and HUD are revising this standard and failure to include this may require revision in this Ordinance.

Response 3D: ***See Response 2N. As a courtesy, the definition of lead-based paint has been revised in the updated Draft Ordinance provided in Appendix A.***

Comment 3E: The term "lead sampling technician" should be changed to "*lead dust sampling technician*". "Lead sampling technician" is an archaic term.

Response 3E: ***See Response 2N. As a courtesy, this content has been revised as noted in the updated Draft Ordinance provided in Appendix A.***

Comment 3F: [Ordinance Section] 54-7A: Add "(3) lead dust sampling technician (non-abatement clearance only – Report must be signed off by Risk Assessor or Inspector)".

Response 3F: ***See Response 2N. As a courtesy, this content has been revised as noted in the updated Draft Ordinance provided in Appendix A.***

Comment 3G: 54-7B.(3)(b): Change "lead sampling technician" to "*lead dust sampling technician*".

Response 3G: ***See Response 2N. As a courtesy, this content has been revised as noted in the updated Draft Ordinance provided in Appendix A.***

Comment 3H: 54-7B.(3)(c)[3]: Change to "Put on *nonlatex, non-sterile, powder-free disposable gloves*…"

Response 3H: ***See Response 2N. As a courtesy, this content has been revised as noted in the updated Draft Ordinance provided in Appendix A.***

Comment 3I: 54-7D.(2): Revise the last line to add the italicized "…dust wipe samples shall be taken in the subject areas until all said areas are found to be below the listed thresholds *unless EPA lowers the standard then the more stringent level shall apply*."

Response 3I: ***See Response 2N. As a courtesy, the City notes that Section 54-7D(1) and (2) of the updated Draft Ordinance (Appendix A) have been revised to address consistency with federal standards in the event that threshold levels become more stringent in the future.***

Comment 3J: 54-7I.(1): Please clarify what qualifications the "hearing officer" should possess with regard to: "The Commissioner shall offer the issuer an opportunity to be heard, at which a *hearing officer* appointed by the Commissioner who is not a City employee shall preside."

Response 3J: ***See Response 2N. As a courtesy, the term "hearing officer" has been defined in Section 54-2 of the updated Draft Ordinance (Appendix A).***

Comment 3K: 54-7D: US EPA is considering lowering the clearance levels for lead in settled dust on floor and windowsill surfaces. EPA reduced the Dust-Lead Hazard levels effective 1/6/2020 to Floors – 10 µg/ft^2, windowsills – 100 µg/ft^2. However, they failed to lower the Clearance standard to match the Dust Lead Hazard levels. By failing to change the Clearance level for floor and windowsills to match the Dust-Lead Hazards level for these surfaces, it leaves us in an awkward position. Thus, we are making a determination that the lead dust on floor surfaces present a hazard when the lead dust level is 10 µg/ft^2 and the lead dust on windowsills present at hazard when the lead dust level is 100 µg/ft^2. However, under the current federal clearance levels, we are going to allow for the unit to pass clearance when the level of lead dust level on windowsills is below 250 µg/ft^2. While it is not required for the Ordinance to be more stringent than the federal law, I recommend the Ordinance set the Clearance standards for floors and windowsills to match the Dust-lead Hazard Levels. (10 µg/ft^2 and 100 ug-ft^2, respectively) and set the window wells to 100 µg/ft^2. These levels have been required since April 2017 for the HUD guarantees. The HUD grants that the City of Syracuse and Onondaga County have are subject to these levels.

Response 3K: ***See Response 2B.***

Comment 3L: In Section 54-8A after "…EPA RRP certification" add "*and said person must be employed by an EPA certified firm*." Federal law requires every project must be conducted by an EPA Certified Firm and that firm must utilize EPA RRP certified individuals.

Response 3L: ***See Response 2N. As a courtesy, this Section 54-8A content has been revised as noted in the updated Draft Ordinance provided in Appendix A.***

Comment 3M: In Section 54-12C Question: Why are "complexes with 10 or more units" exempt? Lead hazards are just as likely to be present in complexes as can be found in housing that does not meet the definition of complexes.

Response 3M: ***See Response 2N.***

Public Comment 4. <u>Daniel Izzo</u>

Comment 4A: (Summary) The commenter is opposed to requiring owner occupied housing units of One or Two Family homes in the City of Syracuse New York that are exempt and not part of the rental registry program be required to have their homes inspected for lead paint if there is no evidence of minors living at or visiting the property of an owner occupant of a one or two family dwelling in the City of Syracuse.

Response 4A: ***The Ordinance does not apply to owner-occupied properties. DGEIS Section 2.2 states that inspections will be conducted for property owners seeking a Rental Registry Certificate or Certificate of Compliance for rental properties.***

Public Comment 5. <u>Jaime Howley</u>

Comment 5A: (Summary) Commenter is speaking as the Co-Chair of the TNT Southside Housing Taskforce. 26% of the children in the Brighton Neighborhood have been identified with lead levels over 10. It is important to note that the acceptable blood lead level in NYS was lowered as of October 2019 when it dropped from 10 to 5 in order to match the levels acceptable lead levels according to the EPA and the CDC. With the lower level of 5, even more of our children in Syracuse are going to be identified as having childhood lead poisoning. The Brighton neighborhood (roughly equivalent to census tract 54) has many substandard rental units and vacant or abandoned houses with deteriorating lead paint on the interior and the exterior. The NYS law was also written so that when that when the EPA and the CDC lower the acceptable lead level, NYS will automatically drop to that lower level. Remember that there is NO safe level of lead. The acceptable lead level has been continually reduced and children can still present with issues caused by lead even at levels under 5. Commenter encourages the City to pass Alternative #1

because it is the strongest option to protect our children now and in the future. This is absolutely a social justice issue. Syracuse must protect our youngest, most vulnerable citizens.

Response 5A: ***Comment is noted. The purpose of the Lead Abatement and Control Ordinance is to identify and correct lead-based paint hazards, in order to prevent human exposure to such hazards. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Public Comment 6. <u>David Michel</u>

Comment 6A: (Summary) The commenter, who has worked in Community Development and Housing, would like to recognize the seriousness of the problem of lead poisoning that affects young children; particularly those in the City's most distressed neighborhoods.

"We support the proposed Lead Paint Ordinance – alternative #1."

"…for this ordinance to be effective, there must be sufficient resources to provide for effective code enforcement and the necessary training and staffing. The announcement that two new housing inspector positions will be created in the division of Code Enforcement is welcomed. We urge the Council, in addition, to adopting this ordinance, to provide these resources as you consider future City budgets."

Response 6A: ***Comment is noted. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Public Comment 7. <u>Adam Wekstein</u>

Comment 7A: The criteria specified in the DGEIS for designation of "high risk areas" are internally inconsistent, amorphous, inappropriate, and conflict with those in the draft lead ordinance itself (which is DGEIS Appendix A). In particular, the DGEIS states on pages 9 and 14 that factors to be considered in delineating and designating high risk areas include, among others, Onondaga County Health Department inspections and elevated blood test levels observed during New York State mandated testing *and* that such factors will be used in concert with HUD guidelines for neighborhood revitalization strategy areas ("NRSA"). Similarly, pages 53 of the DGEIS states that the lead ordinance will authorize city officials to identify high risk areas, "based on a number of factors *including but not limited to*, Onondaga County Health Department inspections, and

elevated blood-test levels observed during New York States mandated testing". In contrast, the draft lead ordinance itself (Section 54-6) states that the high risk areas will be based on the County Health Department inspections in conjunction with the elevated blood level tests (exclusively).

Response 7A: ***See Response 2N. As a courtesy, the City offers the following in response to the comment:***
Section 54-5 of the updated Draft Ordinance (Appendix A), previously listed as Section 54-4 in the Draft Ordinance, now reflects the DGEIS wording concerning the identification of high-risk areas. Section 54-7, previously listed as Section 54-6 in the Draft Ordinance provided in DGEIS Appendix A, concerns standards for clearance examination and report, not the designation of high-risk areas.

Comment 7B: NRSA designation criteria are not relevant; they relate to identifying distressed areas to allow greater flexibility in use of Community Development Block Grants in the specified neighborhoods. See DGEIS Appendix B. They should not serve as a basis for determining high risk areas to advance the entirely-different purposes of the lead ordinance.

Response 7B: ***NRSA boundaries represent only one of the multiple factors used to determine high-risk areas. The NRSA boundaries are a useful tool in designating these areas because 50% or more of the structures built within those areas predate the 1978 federal ban on the commercial use of lead-based paint.***

Comment 7C: The designation of an area as an NRSA is unrelated to any finding that there is an enhanced risk of lead contamination/exposure, particularly to young children, in comparison to other areas of the City.

Response 7C: ***With reference to Response 7B, the NRSA boundaries are a helpful tool in identifying areas where a substantial number (>= 50%) of residential structures were built prior to the 1978 federal ban on commercial use of lead-based paint. Therefore, the NRSA boundaries help identify areas within the City at risk of having deteriorated lead-based paint. The risk that structures built prior to 1978 pose to children is reflected in in the data found within the DGEIS: 87% of all children with elevated blood lead levels (EBLL) in Onondaga County reside in the City of Syracuse, where there is a concentration of***

residential structures built prior to 1980 relative to other municipalities located in the County. As described in DGEIS Section 2.2, areas with a high density of these structures present greater levels of risk for lead exposure to children.

Comment 7D: If employed by the lead ordinance, the criteria used to identify an NRSA may lead to designation of portions of the City as high risk areas, that do not present an enhanced risk to the primary target group—that is, children of less than six years of age—and, indeed, could result in designation of areas with low concentrations of children.

Response 7D: ***Comment is noted. See Responses 7B and 7C.***

Comment 7E: The criteria currently included in Section 54-6 of the draft lead ordinance—that is, reliance solely on the Onondaga County Health Department inspection data and elevated lead blood levels tests gathered through New York State mandated testing—present appropriate standards and should serve as the exclusive criteria for delineating and designating high risk areas.

Response 7E: ***See Response 2N. As a courtesy, the City offers the following in response to the comment:***
The City believes high-risk areas should be established based on the best available data. The Onondaga County Health Department inspection data and elevated lead blood level tests represent some of the best available data the City can use. The NRSA boundaries also provide the City with valuable data, as discussed above. Additional information may also be valuable in establishing high-risk areas. For this reason, the City does not wish to limit itself to one source of information in establishing high-risk areas. Instead, it seeks to utilize various credible sources.

Comment 7F: The DGEIS states at page 14 that "the means and methods for visual assessment, designation of high risk areas, and dust wipe clearance requirements will be established by the City, and will evolve as appropriate as a result of future health testing results, unknown data/research findings, budgetary considerations, or other unforeseen matter". The draft lead ordinance includes no such language suggesting that the designation standards will evolve. The criteria for designation of high risk areas should be precisely specified in the lead ordinance, and should not be subject to modification by the Mayor or other administrative officials of the City. If the standards for designation of high risk areas are to change, such changes should occur only by future

amendments to the lead ordinance adopted by the City Council, actions which, in and of themselves, would be subject to review under the State Environmental Quality Act ("SEQR"; collectively referring to Article 8 of the Environmental Conservation Law and 6 N.Y.C.R.R Part 617). Unless the lead ordinance definitively establishes standards to designate high risk areas which are not subject to modification absent legislative action, the current SEQRA review of the proposed action would be incomplete and inaccurate. Depending on the standards employed to designate high risk areas, impacts on issues such as abandonment of rental housing, community character, the patterns of community growth and development and fiscal impacts on the City, could vary wildly. As a matter of equity, any changes in such criteria should be the subject of public notice to the potentially-effected land owners and residents.

Response 7F: ***Comment is noted. The high-risk area to be identified by the Mayor or the Mayor's designee shall be based on relevant factors including, but not limited to, the use of the Neighborhood Revitalization Strategy Area and the County Health Department inspections data in conjunction with its elevated blood-lead level data. The need for future SEQR review with respect to potential changes to the definition of "high risk areas" will be based on SEQR regulations. As noted in the NYSDEC SEQR Handbook, Fourth Edition dated 2019, the City as lead agency will examine whether changes in the project, newly discovered information, or a change in circumstance have the potential to result in new, previously undisclosed or unevaluated impacts that may or may not have a significant adverse impact, and will identify whether a supplemental GEIS is warranted.***

Comment 7G: The DGEIS expressly declines to assess the total potential costs that could be incurred by property owners and residents or the economic consequences that may result from testing and remediation of lead conditions. (See, for example DGEIS page 44). Therefore, it fails to provide any meaningful evaluation of the potential for: (i) abandonment of rental housing both in high risk areas and other portions of the City; (ii) disinvestment in high risk areas and reallocation of investment to other areas in or outside of the City and the resulting impacts on business; (iii) impacts on availability and condition of housing stock; (iv) economic impacts on landlords; and (v) impacts on housing costs, in general, and the amount of rents, in particular. Once again, all of these issues relate to areas of the environment which must be studied, including impacts on neighborhood and community character, the pattern of growth and development and the fiscal impacts on the City (resulting from potential changes in the City's revenues and potential increases in municipal costs). The draft lead ordinance itself appears to recognize the

importance of such economic data by including a blank space for such information. Section 54-1(J), part of the "Legislative Findings" in the draft ordinance, states: "[a]ccording to the environmental impact statement, proposed lead-based paint poisoning legislation could have a cost impact on the rental housing market as high as $_____ depending on the alternative chosen.

Response 7G: ***Comment is noted. As explained in DGEIS Section 2.4.1, public scoping was conducted as part of the SEQR process as set forth in 6 NYCRR Part 617.8(f). A public comment period was provided to allow agencies and the public to comment on the identification of significant environmental conditions and resources that may be affected by the proposed action, and the extent and quality of information necessary to address those issues during the SEQR process. The Final Scoping Document was released on 12/17/2019, and Section 3.3 Growth and Community Character of the scoping document identifies the topics and content that are included in the corresponding DGEIS Section 3.3.***

These costs are not required to be included in the Ordinance, and the City has removed the section previously listed as Section 54-1(j) in the updated Draft Ordinance (Appendix A). Cities that have implemented similar laws, such as the City of Rochester, have not experienced a reduction in available rental housing or a loss of investment in the City. Finally, the City of Syracuse has opted to link its standards to those of the EPA, standards which units in the City of Syracuse are already obligated to adhere to. The Ordinance provides a means to enforce those standards.

Comment 7H: The DGEIS is silent as to the number of additional employees and resources which will be needed to implement the lead ordinance, and the concomitant costs which may be incurred by the City is undertaking activities associated with the Ordinance, including, but not limited to, inspections, review of certifications and test results and enforcement. Nor does it discuss what additional revenue sources, such as new fees or tax increases, will be used to fund the City's fulfillment of its obligations under the lead ordinance. Again, this information is relevant to assessment of fiscal impacts on the City, and the potential diversion of resources currently used for other City programs and functions.

Response 7H: ***See Response 7E relative to scoping. The Ordinance will be enforced through the City's Rental Registry, which will cover the operating burdens of implementing the Ordinance***

for the City. The City will address staffing and funding considerations prior to the Ordinance taking effect.

Comment 7I: To the extent of any additional fees or taxes may be imposed on landowners or residents their identification and quantification is necessary to assess the lead ordinance's impacts on the pattern of growth and development and neighborhood character.

Response 7I: ***See Response 7E relative to scoping. The Ordinance does not impose additional fees on landlords or residents. The Ordinance will be enforced through the City's Rental Registry, which outlines applicable fees which are already enforced in the community.***

Comment 7J: The DGEIS includes no rational explanation for the exemption of owner-occupied housing from compliance with *any* of the meaningful requirements of the lead ordinance; in particular, the draft lead ordinance would exempt such housing from the requirements of Section 54-4 through 54-6. Of course, such homes, particularly in areas that are designated as "high risk", have a significant likelihood of being occupied by the most at risk population—that is, children under the age of six. At bare minimum, the lead ordinance should require that all residential buildings, rather than just non-owner-occupied ones, be maintained so that there are no deteriorated paint violations in accordance with Section 54-4. In addition, in order to constitute an effective means to combat the lead hazard, the lead ordinance should require visual inspections for deteriorated paint conditions and bare soil violations any time an owner-occupied dwelling undergoes an inspection in connection with the issuance of a building permit and/or certificate of occupancy, and, if required, associated dust sampling, in accordance with the same requirements imposed on non-owner-occupied homes. The complete exemption for owner-occupied housing is also conceptually irreconcilable with the other exemptions in the draft lead ordinance for housing for seniors and all studio apartments. Such exemptions simply eliminate the requirement for dust sampling for such dwellings, but do not exempt them from the requirements of Section 54-4, that all buildings constructed prior to January 1, 1978 must be maintained so that no deteriorated paint violations exist. Clearly, the generic class of owner-occupied dwellings would have a higher likelihood of being inhabited by children younger than six than would senior citizen housing and studio apartments, yet the former is subject to less stringent restrictions than the latter. The disparate treatment has no logical, environmental, or legal basis.

Response 7J: ***See Response 2N. As a courtesy, the City provides the following in response to the comment:***

Lead paint from old housing places a disproportionate burden on low-income and minority children, and in the City of Syracuse, most low income residents reside in rental units. The City's focus on renters provides an effective means to address the issue of deteriorated lead paint and resulting exposure among vulnerable populations. As a principle underlying the ordinance's emphasis on rental units, tenants should not be subjected to dangerous environmental conditions and associated health impacts in income-generating properties for which the owner holds control. In many cases, there is little or no financial incentive for the owners of income-generating properties to incur costs related to lead abatement, and the tenant rather than owner is the primary beneficiary of measures taken and costs incurred to improve environmental conditions. This dynamic is structurally different than in owner-occupied housing where the owner incurs both the costs and benefits of abatement activities and is thereby incentivized to make changes to deteriorating lead-based paint in order to reduce personal exposure as a resident of the structure. Tenants may be unaware of the existence of lead paint in their rental unit, while an owner – either a landlord or an owner in an owner-occupied dwelling – should have knowledge of the existence of lead paint and bear responsibility for addressing the issue. Additionally, many renters cannot afford or are unable to attain home ownership. They rent units that they can afford, which often are in areas of the City that are at high-risk of lead-paint deterioration. For these reasons, rental properties are viewed as a high priority and addressed by the Draft Ordinance. In the future, the City may seek a means of addressing owner-occupied dwellings. However, it first seeks to address those who are at the greatest risk with no means of enacting change: renters.

Public Comment 8. <u>Travis Hobart</u>

Comment 8A: (Summary) Commenter shared personal experience and perspectives on the effects of lead exposure on children, including health and developmental effects as well as economic implications. Expressed support for the proposed ordinance and stressed its importance to the City's children. An attached resolution from the Pediatric Society of Onondaga County dated May 2018 documents this organization's support for the implementation and enforcement of regulations protecting children from lead exposure.

Response 8A: ***Comment is noted.***

Public Comment 9. <u>Mary Cunningham</u>

Comment 9A: I am writing to support a lead remediation ordinance that supports the lowest amounts of lead dust in the environment. I also recognize that as the homeowner of old homes in the city for 43 years, that is wishful thinking that painting the outdoor porches, house windows will last for 20 years and thereby encapsulate the old lead paint. That is not substantiated by my experience or by many of us. When paint is used to encapsulate lead, it should be recognized that it is temporary at that regular 3 year inspections should be part of a permanent follow up.

Response 9A: ***See Response 2C. Per Section 2.2 of the DGEIS, inspection is required upon renewal applications for the Rental Registry and Certificates of Compliance for rental properties at three-year intervals, as well as in response to the filing of a complaint.***

Comment 9B: I would also like there to be recognition that the money allotted to lead remediation is insufficient for the problem, but is a good beginning. However, we have thousands of children and young adults with permanent lead poisoning who need special services and support for the rest of their lives-through special education services in school, job training as young adults, mental health remediation for many, supportive living services for some for their whole lives and unfortunately, criminal enforcement services for those who cannot control their behavior. The expense and loss of skills and independence for so many is a burden on the individual, the family and the society. Somehow we need to make sure we spend money NOW to ensure that we do not perpetuate the creation of people with disabilities and that we create people who can be part of and contribute to our community. This would be priceless. We need to push for remediation for people as well as homes

Response 9B: ***Comment is noted. The Draft Ordinance provides a mechanism to identify and reduce human exposure to lead in the community.***

Comment 9C:. Lastly, I hope that remediation at some point, makes protection for tenants who blow the whistle on landlords and also protect them from being priced out of newly remediated apartments.

Response 9C: ***DGEIS Section 3.3.2.3 addresses measures to protect tenants from potential retaliation by landlords in response to the reporting of suspected lead-based paint hazards to the property owner or City.***

Public Comment 10. <u>Ellen Morrissey</u>

Comment 10A: (Summary) I am deeply concerned that the proposed lead ordinance fails to allow for, or encourage, lead hazard reduction in every unit of a two, three, or four unit dwelling, once one of those units has poisoned a child's family. Just as all the electrical wiring should be inspected throughout a home if one unit has old wiring whose age threatens to cause a fire, every unit of a dwelling should be inspected for lead hazards if any single unit is discovered to have lead hazards. …it is completely reasonable to assume that a multi-unit dwelling where lead hazards are present in one unit will most likely have serious lead hazards that need fixing in all other units. Additionally, if a potentially hazardous unit is rented by adults without children, it is unsound, and potentially reckless, policy to await the arrival of a family with children before taking action to inspect for fixable lead hazards. As a result, I wish to recommend that the Syracuse Lead Ordinance include language requiring Code Enforcement inspections for lead hazards in every unit of a multi-unit dwelling (located within the high risk area) when any one unit is discovered to have a lead hazard. And, further, that the presence of such lead hazard shall be communicated to the current tenant(s) and fixed immediately.

Response 10A: ***Section 2.2 of the DGEIS identifies the conditions and actions which require the performance of a lead inspection. Inspection is required upon renewal applications for the Rental Registry and Certificates of Compliance for rental properties at three-year intervals, as well as in response to the filing of a complaint. Each unit of a multi-unit rental property is subject to inspection.***

Public Comment 11. <u>Leslie Paul Luke</u>

Comment 11A: This letter is to confirm support from St. Joseph's Health for the proposed lead ordinance in the City of Syracuse. Allowing code inspectors to take dust wipe samples in pre-1978 structures—even where deteriorated paint is not visible—is a common sense environmental health mitigation tool that will serve the best interests of our city's most vulnerable residents. This new law will hold property owners accountable for ensuring that the residences they maintain for rental will,

in short, no longer poison our community. Setting a standard to clear properties for residency with a contingency on lead testing further protects our community members who rely heavily upon rental properties and those who maintain them. As one of the Central New York region's largest and most comprehensive health systems, St. Joseph's Health understands that good community health is about so much more than clinical care. Population health is largely dependent upon the social determinants of health, including access to affordable and safe housing. The data is clear; lead continues to poison our children in particular, resulting in behavioral, and neurological effects that impact a child's educational and decision-making aptitude. This lead ordinance has the potential, therefore, to impact the life trajectory of generations of children who will inhabit apartments in our city today and in years to come. In addition to offering a mitigation effort to protect the health and safety of our city residents, the new lead ordinance also give voice to community members who continue to be disproportionately impacted by numerous social and environmental health risks. While this ordinance alone will not address the whole of challenges faced by many City of Syracuse residents living in poverty, it is a critical step in support of health equity. In alignment with our mission to improve the health of all populations we serve, St. Joseph's Health fully supports the proposed City of Syracuse lead ordinance.

Response 11A: ***Comment is noted.***

Public Comment 12. <u>Margaret Bombard</u>

Comment 12A: After reading the ordinance, I would like to register my support for "Alternative 1" which allows for the designation of higher risk areas which would receive stricter guidelines-again, the statistics from the health dept. make it clear this is needed.

Response 12A: ***Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Comment 12B: The track record of local landlords also makes me feel that extending the retaliation period to at least a year rather than six months is necessary.

Response 12B: ***See Response 2H. DGEIS Section 3.3.2.3 addresses measures to protect tenants from potential retaliation by landlords in response to the reporting of suspected lead-based paint hazards to the property owner or City.***

Comment 12C: Also, as a long time homeowner in Syracuse I know that it is very unlikely that any type of paint encapsulation would last 20 yrs. I hope that properties that have been "cleared" due to painting remediation will continue to be inspected at least every 5 years or so.

Response 12C: ***Per DGEIS Section 2.2 and Draft Ordinance Section 54-5(a), inspection is required upon renewal applications for the Rental Registry and Certificates of Compliance for rental properties at three-year intervals, as well as in response to the filing of a complaint. Periodic inspections are intended to ensure that owners maintain ongoing compliance as property conditions may change over time.***

Comment 12D: Lastly, the city has such a great amount of information available on their website that I was shocked to hear that the lead violation and abatement information is not available online for parents to access.

Response 12D: ***See Response 2F.***

Comment 12E: I do have one other separate idea I would like to propose that maybe the health dept. could consider: mandatory pre-discharge education for mothers leaving our hospitals with newborns about the danger of lead.

Response 12E: ***Comment is noted.***

Public Comment 13. <u>Mary Carney</u>

Comment 13A: Given the devastating consequences of childhood lead poisoning, the City should make every effort to enact the strongest possible ordinance. For this reason, I support the option that includes designation of "high risk" areas and subsequent dust-wipe sample clearance protocols (Alternative 1).

Response 13A: ***Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 and includes dust-wipe sample clearance protocols in high-risk areas as described in Section 1.5.***

Comment 13B: Concern #1 is that landlords will not strictly follow Lead Safe Work practices, even though they are required to do so by law. Having personally participated in the multi-day training on lead safe work, I know how stringent Lead Safe standards are. If the ordinance allows abatement work to be performed by a landlord or unpaid family members, it is highly unlikely they will follow the strict standards, because they are significantly more onerous than typical work. Unsafe work can do more harm to vulnerable tenants and their children, so I think the law should require the work to be done by certified professionals.

Response 13B: ***Lead hazard removal must be completed by certified personnel. This includes formal abatement, or work covered under the Renovation, Repair and Painting Program Rule. See Section 54-2 of the updated Draft Ordinance (Appendix A) for definitions of "certified" and "Renovation, Repair and Painting Rule (RRP) Certification".***

Comment 13C: Concern #2 is that landlords will retaliate against tenants who report concerns about lead poisoning. As you are aware, landlords often raise rent, fail to do repairs, and evict tenants who they unfairly blame for causing the expense and legal hassle of having their property cited for code violations. I am not a lawyer and don't know the best legal mechanisms for protecting tenants from these issues, but I urge you to make sure the ordinance is as strong as possible on tenant protection.

Response 13C: ***Tenant protections are addressed in Section 54-13(B) of the updated Draft Ordinance (Appendix A) and addressed in DGEIS Section 3.3.2.3. These protections are consistent with New York State law.***

Public Comment 14. <u>Feruzi Murairi</u>

Comment 14A: I am writing out of deep concern over the crisis of childhood lead poisoning in Onondaga County, and particularly among families in Syracuse, New York. I hereby submit a public comment related to the proposed Syracuse Lead Ordinance. As you may know, when Rochester, New York passed their Lead Ordinance in 2005, they used up-to-date scientific standards for finding dust lead hazards. Today, those scientific standards have been updated once again. However,

the current version of the Syracuse Lead Ordinance uses the old, less-safe standards. This is unacceptable. The Syracuse Lead Ordinance should include the most up-to-date safety standards for finding dust lead hazards that are recommended by the Environmental Protection Agency (EPA) and the department of Housing and Urban Development (HUD). The updated dust-lead clearance standards from EPA and HUD are: Floors: 10 micrograms per foot square (ug/ft^2); Windowsills: 100 micrograms per foot square (ug/ft^2); Window trough: 100 micrograms per foot square (ug/ft^2). Please be informed that the updated standards can be found at these websites: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2018-0166-0360; https://www.epa.gov/newsreleases/epa-and-hud-announce-new-lead-dust-standards-protect-childrens-health; https://www.hud.gov/sites/documents/LEADDUSTCLEARANCE.PDF Please apply the most up-to-date standards for lead dust clearance levels to the Syracuse Lead Ordinance. Thank you for your time and thoughtful consideration of these recommendations.

Response 14A: ***See Response 2B.***

Public Comment 15. <u>Office of the New York Attorney General</u>

Comment 15A: The New York Attorney General's Office strongly supports the adoption of a lead ordinance by the City and appreciates the consideration of tenant protections in both Alternative 1 and Alternative 2. Deteriorating lead paint from old housing stock places a disproportionate burden on low-income and minority children, and so we strongly recommend Alternative 1 due to the recognition of environmental justice concerns in the designation of "high-risk areas" for additional inspections.

Response 15A: ***Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Comment 15B: First, inspections should take place every three years and at tenant turnover.

Response 15B: ***See Response 2N. As a courtesy, the City notes that per DGEIS Section 2.2 and Draft Ordinance Section 54-5(a), inspection is required upon renewal applications for the Rental Registry and Certificates of Compliance for rental properties at three-year intervals, as well as in response to the filing of a complaint.***

Comment 15C: Second, all inspections should include mandatory dust wipe sampling.

Response 15C: ***See Response 2N. As a courtesy, the City notes that per DGEIS Section 2.2, the Draft Ordinance requires dust-wipe sampling to be conducted as part of all visual assessments occurring in designated "high risk" areas.***

Comment 15D: Third, landlords should bear the burden of lead abatement related relocation costs.

Response 15D: ***See Response 2N.***

Comment 15E: Finally, a private right of action for tenants should be established to prevent retaliatory action by landlords.

Response 15E: ***See Response 2N.***

Comment 15F: The City requires rental properties to register with the City every three or five years, depending on the size of the dwelling and the location of the property.6 Both Alternative 1 and Alternative 2 mandate that as part of the registration, rental properties built before 1978 must be inspected for lead paint hazards. However, any property can be subject to heavy wear and tear, especially properties with child occupants and properties with heavy turnover. Families may also move more often than every three or five years, especially low-income families. Under Alternatives 1 and 2, properties would be inspected more often only if a tenant makes a formal complaint, which also requires that the property be inspected. This schedule of inspections can be strengthened by requiring inspections every three or five years and at tenant turnover. Given that the dwelling is empty at turnover, it is an ideal time for any lead paint abatement, if any is necessary. Because the City cannot be expected to monitor tenants' activity, landlords should be responsible for initiating inspections at turnover.

Response 15F: ***See Response 15B.***

Comment 15G: When any inspection is performed, a copy of the inspection report should be filed with the City. All inspections should be performed by an EPA certified inspector. The City should impose a penalty for landlords if they fail to comply with these inspection requirements.

Response 15G: ***See Response 2N. As a courtesy, the City notes that inspectors will be EPA certified; the Draft Ordinance provides for the issuance of penalties in response to violations.***

Comment 15H: We strongly support the requirement of dust-wipe sampling in these high-risk areas as required in Alternative 1. We recommend that the dust-wipe sampling as defined in the ordinance be expanded to all inspections, irrespective of what geographic area the dwelling is in or whether a visual assessment identifies any interior deteriorated paint violations. Dust wipe sampling is a vital part of a comprehensive strategy to prevent lead poisoning, as the City acknowledges itself.

Response 15H: ***See Response 15C.***

Comment 15I: In Section 55-9 of the proposed ordinance, occupant protections during lead hazard reduction activities are laid out. Item A(2) states that "occupants shall be temporarily relocated during hazard reduction activities . . . and occupants who relocate to a unit not owned by their landlord shall not be liable for rent accruing during that time." DGEIS, Appendix A: Draft Lead Ordinance at 18. However, neither Section 55-9 or elsewhere in the ordinance does it explicitly state that the landlord must pay any costs associated with relocating the tenant, including any rent owned to another landlord--or rent paid to a relative or friend if the tenant selects to move in with one--during relocation. Nor does it explicitly protect tenants from eviction by that other landlord if the original landlord does not pay the rent. Both of those protections should be made clear in this section of the ordinance. Furthermore, it should also be stated that the tenant must be relocated to a comparable apartment in the same general location.

Response 15I: ***See Response 2N.***

Comment 15J: Section 55-9(A)(3) states that "occupants' belongings in the containment area shall be relocated to a safe and secure area outside the containment area, or covered with an impermeable covering with all seams and edges taped or otherwise sealed." Id. at 19. Tenants should have some agency over what happens to their personal belongings over what may be a prolonged period of time. If the hazard reduction activities will cause the tenant to be relocated from the unit for a prolonged period of time, then the tenant should have the option of storing or relocating their belongings at the landlord's expense.

Response 15J: ***See Response 2N.***

Comment 15K: Further, Section 55-9(A)(4) states that "if interior hazard reduction activities will not be or are not completed within 60 calendar days, occupants shall have the right to terminate their lease and shall have no further obligation to pay rent under their rental agreement. . ." Id. While tenants should have this option, landlords could use this provision to force tenants out by not completing the work in a timely fashion. Landlords could also fail to renew month-to-month leases while hazard reduction work is being performed. The ordinance should also affirmatively protect the tenant's right not to terminate and, if on a month-to-month tenancy, to renew the lease, and landlords that attempt to perversely use the ordinance to evict tenants should be penalized.

Response 15K: ***See Response 2N.***

Comment 15L: Section 54-13 of the ordinance prohibits landlords from retaliating against tenants for reporting suspected lead-based paint hazards to them or to the City. Retaliatory actions include "any actions that materially alter the terms of the tenancy (including rent increases and non-renewals) or interfere with the occupants' use of the property." Id. at 21. The ordinance creates a rebuttable presumption "that any attempt by the owner to raise rents, curtail service, refuse to renew or attempt to evict a tenant within six months after any report to the City or the owner or any enforcement action in connection with a suspected lead hazard is a retaliatory action in violation of this section . . ." except if the tenant is not paying rent or is committing waste. After six months, retaliatory eviction is still available to the tenant as a defense, but there is no benefit of presumption. While the existence of this presumption for six months is a benefit to the tenant, more can be done to protect tenants from retaliatory action by landlords. First, six months is not aligned with New York state law. State law on retaliation by landlords against tenants creates a rebuttable presumption of retaliation for one year after a tenant makes a complaint or takes action to secure their rights. The ordinance should not be less protective than state law, it should, at a minimum, be consistent.

Response 15L: ***See Responses 2H and 2N. As a courtesy, the City notes that Section 54-13 of the updated Draft Ordinance (Appendix A) has been revised to extend tenant protections against retaliatory actions by landlords to one year, consistent with New York State law. State law remains applicable even if not directly referenced or included in the Draft Ordinance.***

Comment 15M: Just as importantly, in its current form, the ordinance only protects tenants once they are brought to court by their landlord. Some tenants may never get to that point. If the landlord raises the rent beyond what the tenant can pay, the tenant may choose to move rather than be sued by their landlord. The private right of action should allow tenants to sue their landlords if, within a year of a tenant reporting a suspected lead hazard to the City or the owner is subject to any enforcement action in connection with a suspected lead hazard, the landlord attempts to raise the rent unreasonably, curtails service, refuses to renew the lease or attempts to evict the tenant. The tenant should be given the presumption that the landlord's action was retaliatory, and the landlord should have the burden of proving that the action was not retaliatory. If the tenant wins in any action about retaliatory behavior, whether the tenant is the plaintiff or the defendant, the landlord should be required to pay the tenant's attorney's fees and a statutory penalty to the tenant.

Response 15M: ***See Response 2N.***

Comment 15N: If adopted and implemented, Alternative 1 will reduce the likelihood of tenant exposure to lead and elevated blood lead levels in children. We urge its adoption, along with the recommendations articulated above, to better protect the citizens of Syracuse.

Response 15N: ***Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Public Comment 16. <u>Aggie Lane</u>

Comment 16A: I am writing out of deep concern over the crisis of childhood lead poisoning in Onondaga County, and particularly among families in Syracuse, New York. I hereby submit a public comment related to the proposed Syracuse Lead Ordinance regarding two items: One, the standard for the presence of lead dust in the city-proposed Lead Ordinance needs to be updated to the EPA's and HUD's standards.

Response 16A: ***See Response 2B.***

Comment 16B: Two, the tenant protection in the proposed lead ordinance needs to be strengthened so that tenants worried about the presence of lead in the rental can contact any city, county, or state agency without fear of eviction by their landlords.

Response 16B: ***See Response 2Z.***

Comment 16C: This Lead Ordinance will also create local accessible job and contracting opportunities. Syracuse Build and the CNY Community Foundation should team up to train and place city residents wanting to be included in this lead abatement work. Reducing poverty in city neighborhoods through good jobs goes hand-in-hand with lead poisoning reduction.

Response 16C: ***Comment is noted.***

Public Comment 17. <u>Peter</u>

Comment 17A: I am writing in concern pertaining to the *General Environmental Impact Study* that was recently released. It is quite obvious from the study that the dust wipe sampling is clearly out of date. Please see that the window trough standards become more stringent.

Response 17A: ***See Response 2B.***

Comment 17B: It is imperative that loopholes allowing landlords to pass insufficient work must be amended. Several areas of the current law allow landlords to sneak by with out-of-code work and easily push to 'delay' work as they see fit. Allowing the landlord time to complete his/her job is not in complaint, it is the clear obstruction of justice for those most affected by these acts-the low income and disparaged sections of our city.

Response 17B: ***See Response 2N. As a courtesy, the City notes that the comment does not refer to specific provisions that present loopholes or are otherwise considered problematic. DGEIS Sections 3.2.6.1-3.2.6.3 summarize the standards to be applied to lead abatement activities under the Draft Ordinance.***

Comment 17C: Seek to be a champion of change regarding transparency of the information collected concerning lead poisoning in our city. Make the data public. These are our children. These acts

are shameful and steeped in the greed and selfishness of the landlord(s). Data made public makes the community stronger.

Response 17C: ***See Response 2F.***

Public Comment 18. <u>William J. Scott</u>

Comment 18A: (Summary) On behalf of Syracuse Teachers Association and its 3,200 members, the commenter encourages the Common Council to pass the proposed lead ordinance. Educators working in the City observe firsthand the significant impact that exposure to lead has on our residents, and are especially concerned about the impacts to children. This legislation is a necessary and important step in the direction of helping to keep families and children safe from the dangers of lead contamination and the members of Syracuse Teachers Association fully support the ordinance.

Response 18A: ***Comment is noted.***

Public Comment 19. <u>Richard Puchalski</u>

Comment 19A: Dust wipe sampling: Lead Ordinance should be the highest level implemented by HUD.

Response 19A: ***See Response 2B.***

Comment 19B: Provide proper definition in Section 54-4: Commissioner, director, and department.

Response 19B: ***See Response 2G.***

Comment 19C: Executive Summary: should provide more historical figures of children under 6 years old with elevated blood lead levels in the last 6-8 years.

Response 19C: ***Comment is noted. DGEIS Section 2.2 references statistical information about lead exposure in children, including children under age six. The FGEIS Executive Summary provides an expanded description of lead exposure statistics and historic context.***

Comment 19D: List all neighborhoods including those with high number of vacants where lead remediation is needed—estimated costs to remove lead.

Response 19D: ***Comment is noted. See Section 2.2 of the DGEIS, which includes a description of HUD guidelines for designation of Neighborhood Revitalization Strategy Areas (NRSAs), which are among the criteria to be considered in designating "high risk" areas.***

Comment 19E: Alternative 1: includes dust wipe sampling. Dust from lead paint is a major contributor to lead poisoning and should be included in the lead ordinance.

Response 19E: ***See Response 2E. Per DGEIS Section 2.2, visual assessments performed in designated "high risk" areas will include dust wipe sampling.***

Comment 19F: Section 54-13 (B) Prohibition of Retaliatory Action—Inconsistent with Tenant Protection Act of 2019.

Response 19F: ***See Response 2H.***

Comment 19G: Section 54-13 (B) Prohibition of Retaliatory Action: Governmental Agencies.

Response 19G: ***The substance of this comment is unclear as presented.***

Comment 19H: Make the data about lead hazards and Certificate of Occupancy not just public but place it in an electronic database.

Response 19H: ***See Response 2F. DGEIS Section 3.3.2.1 addresses the maintenance of City databases.***

Comment 19I: Getting the word out about the lead ordinance once it is passed in targeted neighborhoods like the near westside, Skunk City, southwest and southside. There shall be a robust door to door effort to make the tenants and homeowners aware of this ordinance, with door to door flyers, banners posted across the street along with a city mobile van full of instructional literature on how one can obtain grants and even loans to remove lead in their homes. This effort would be staffed by up to five city employees including housing inspectors. Community residents shall attend meetings with presentations as well as visit the ban to obtain information about the lead

program. The Fire Department would join in this effort to educate and install fire and carbon detectors in occupied homes where there is none. There is no reason why this effort should be repeated on the other sections of the city.

Response 19I: ***Comment is noted. The City will take measures to promote public awareness prior to the Ordinance taking effect.***

Public Comment 20. **Peter King**

Comment 20A: "…I support this document and ordinance going forward, and I support the more stringent "1st alternative" proposed on page 15, including a prioritized focus on 'high-risk' areas, over a less targeted, more generalized "2nd alternative"."

Response 20A: ***Comment is noted. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Comment 20B: (Summary) Commenter expressed a number of views with regard to 1) The soil ~vs~ paint concern. In the Common Council's excellent public discussion session about the DGEIS on Thursday, Feb. 12, 2020, at least one landlord raised a concern that landlords cannot control loose soils from entering tenants' living spaces and this may occur despite a landlord's best efforts. Commenter disagrees with stated assumptions on DGEIS page 42 under part 3.2.5 'Environmental Conditions' about paint being the only source for lead dust. Studies are cited which identify sources of lead dust exposure such as soils contaminated through historic leaded gasoline use, resuspended lead dust occurring on hot and dry days. While the lead in leaded paint is often much more concentrated, the lead in soils can often be more immediately bioavailable. Dr. David Johnson of SUNY-ESF in Syracuse co-authored one key paper demonstrating how hot, dry weather was most strongly connected with seasonally high Children's blood lead levels in Syracuse, Indianapolis and New Orleans (Laidlaw et-al, 2005). Lead in soils can accumulate from multiple sources, including leaded gasoline, deteriorated lead paint, and former lead-generating industrial operations. These different sources can often combine in urban soils, concentrating lead in dangerous levels. Also, local construction and poverty conditions can increase bioavailable lead concentrations in soil. Anecdotally, housing demolitions in Syracuse may occur without regard for the resulting dust from flaking paints and without adequate personal protective equipment. Play areas for children may expose them to

lead contamination, and Norway and New Orleans have adopted lead standards for playgrounds. Levels of lead in soils have declined over time. The I-81 viaduct project could expose residents to lead dust contamination. New York City and other cities have developed policies which can prevent exposure from lead dust during development activity.

Response 20B: ***Comment is noted. Dust wipe sampling to be conducted in high-risk areas will determine lead concentrations, without consideration of the origin of lead found to be present.***

Comment 20C: My second concern is, 2) Avoiding targeting low-income areas too harshly, without providing support in what we would hope ultimately becomes a positive transition. In implementing policies which will drive off some landlords and attract new ones, can the policy find ways for preventing harm on residents from this intensive process? For example, rapid construction can generate harmful lead dust, while people are nearby. Improving neighborhoods creates amenities, which can potentially attract wealth. One 'second-order' social effect from this ordinance might be, accelerating gentrification in Syracuse, before residents can match rising costs with rising incomes. Methods for countering accelerating gentrification might include, providing some resources for residents interested in becoming adequately trained and credentialed in EPA-certified lead-safe practices.

Response 20C: ***Comment is noted.***

Public Comment 21. **<u>Families for Lead Freedom</u>**

Comment 21A: (Summary) EPA and HUD dust-wipe sampling standards have been updated as of January 6, 2020. These standards should apply to Alternative 1 in the Draft Generic Environmental Impact Statement. The comment provides updated values of 10 $\mu g/ft^2$ for floors, 100 $\mu g/ft^2$ for windowsills, and HUD's standard of 100 $\mu g/ft^2$ for window troughs. The Ordinance should be revised at Section 54-7(D) to meet EPA/HUD standards, including the HUD standard for window troughs. References to resources documenting change to EPA/HUD standards are provided by the commenter.

Response 21A: ***See Response 2B.***

Comment 21B: (Summary) There are incomplete definitions for "Commissioner", "Director", and "Department" in the Draft Ordinance, and the commenter is concerned that failure to provide proper definitions could make the Ordinance unenforceable, unworkable, or otherwise encounter serious legal challenges. References are made to Draft Ordinance sections where these terms are used. The commenter recommends that definitions for each of these terms be clearly defined in Section 54-4.

Response 21B: ***See Response 2G.***

Comment 21C: (Summary) The first paragraph, third sentence of the DGEIS Executive Summary "woefully under-represents the seriousness of the problem we face in Syracuse." The DGEIS states the number of Syracuse children with elevated levels detected in 2018 by the Department of Health was 446, but the commenter references an online source indicating the number is actually 498. This is also a historic low, although the reason for this is unclear. These numbers should not be used without proper context. A single number does not account for the long-term harm to community residents over time. The full picture is important to have when arguing for the necessity of a strong lead ordinance. Any change in the number should have a corresponding change in the estimated percentage of children under 6 tested in Syracuse who have an elevated blood lead level the cited figure of 10.7% appears inconsistent with the longer-term trend of lead poisoning faced by Syracuse families. A series of figures is provided for consideration.

Response 21C: ***Comment is noted. Lead exposure is an extremely serious problem that has affected children living in the City of Syracuse for decades, often with lifelong impacts. The DGEIS provided an inaccurate number of positive tests for elevated blood lead levels among the City's children in 2018 – the Onondaga County Department of Health indicates that the correct number is 498 children, and this number is significantly lower than historic counts. With reference to the charts provided by the commenter, more than 10% of Syracuse children have tested positive for elevated levels in each year dating back to 2012. The 2018 value of 10.4% is significantly lower than in each of the six preceding years. The FGEIS Executive Summary and corresponding text in Section 2.2 provide updated content in response to the comment.***

Comment 21D: (Summary) Alternative 1 would include dust wipe sampling and the designation of "high risk areas". The applicable DGEIS passage is cited. Common councilors who are serious about addressing childhood lead poisoning in rental housing should approve Alternative 1, which is feasible, cost-effective, environmentally sustainable, and best for the health of Syracuse families.

Response 21D: ***Comment is noted. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Comment 21E: (Summary) Commenter is concerned that data about lead hazards identified, reduced, and controlled with HUD funding, and information about Certificate of Occupancy compliance, will not be accessible unless it is placed on a digital platform. DGEIS Section 3.3.2.1 "Property Transfer and Notification" and Section 54-15 of the proposed lead ordinance are cited. Concerns are stated that walk-in access to databases would be insufficient and may be unavailable to most parents. In addition to a walk-in database, it is recommended that the information be made available through a digital portal which is accessible through the internet.

Response 21E: ***See Response 2F.***

Comment 21(F): (Summary) Section 54-13(B) "Prohibition of Retaliatory Action" is inconsistent with the Tenant Protection Act of 2019. Commenter recommends that this paragraph be re-written to align with Section B of the NYS Real Property Law. In Section 54-13(B), the text should change the time period for the rebuttable presumption from six months to one year.

Response 21(F): ***See Response 2H. As a courtesy, the City notes that Section 54-13 of the updated Draft Ordinance (Appendix A) has been revised to extend tenant protections against retaliatory actions by landlords to one year, consistent with New York State law.***

Comment 21(G): (Summary) This comment is related to the very real matter of too-frequent breaches of warranty of habitability in Syracuse by landlords. In many cases where a breach of the warranty of habitability occurs, tenants withhold rent to encourage a landlord to make proper repairs. Section 54-13(B) should eliminate the phrase "except in instances of nonpayment of rent".

Response 21G: ***See Response 2H.***

Comment 21H: (Summary) Section 54-13(B) "Prohibition of Retaliatory Action" fails to include additional but relevant governmental agencies. Commenter believes this section could be made stronger to protect residents from retaliation which could result if they contact either Onondaga County or the NYS Department of Health in connection with a concern over childhood lead poisoning. Recommendation is to use language that includes communication with all governmental agencies at every level of government short of the federal leave. Specifically, it is recommended that Section 54-13(B) should read as follows: "There shall be a rebuttable presumption that any attempt … to evict a tenant within **one year** after any report to **any governmental agency (City or County or State)** or the owner or any enforcement action in connection with …".

Response 21H: ***See Response 2H.***

PUBLIC COMMENTS FROM PUBLIC INFORMATION MEETING

Public Comment 22. Jamie Hauley

Comment 22A: I'm Jamie Hauley. Paula and I are co-chairs of TNT South Side Housing Task Force. The first thing that I want to talk about is the fact that no one has mentioned that New York State, in October of 2019, lowered the acceptable blood lead level from 10 to 5. That means that under this new blood level more children in Syracuse will be identified with lead poisoning. More children in the school will require special services, there will be more work for Deb Lewis as well and for the inspectors. That's a very important issue to raise. When you look at what's going on in Flint, Michigan, and we may not be in exactly the same situation, but recently I've been reading about the problems that they're having there. They don't have enough staff in the schools to handle the number of children in need. These are very serious questions that need to be included. And because of that, a child with lead poisoning in Syracuse is a very serious issue. And I want to urge the strongest measure you can pass to protect the children, and seniors, too. The lead Ordinance is really an essential. And so it's also a moral question, and a social justice issue. We must protect the youngest most vulnerable citizens.

Response 22A: ***Comment is noted. The purpose of the Draft Lead Abatement and Control Ordinance is to identify and correct lead-based paint hazards, in order to prevent human exposure to such hazards. The prevention of lead exposure in children is an extremely important issue in the City of Syracuse, and the Draft Ordinance seeks to address this issue.***

Public Comment 23. Palmer Harvey

Comment 23A: I'm also the co-founder, and I have a little problem, seems all of this stuff is internal that you guys are asking for. I have more of a question. I notice like a lot of apartments have exterior problems with lead on the outside. So it seems to be is there going to be testing on the outside? Or what is another part? Why are we not doing before, like as part of the inspection. Or if you have rental property, in general should we inspect it before this? Seems like everything we're talking about today is reactionary and not preventative, and that's a huge problem. Because I've met so many tenants whose mothers are crying to me about their children being lead poisoned, and it's not stopping. They have gone through the process you guys talked about, and it's already passed on the parents, of all the things that happened to their children. So has anything been

thought of in that way to have more a preventative measure than anything else? I mean yeah, informational measures are good, but parents should know what we do as part of the Southside Task Force. We should go outside every year to educate the neighborhood. But I think it's a huge problem that we're not doing more educating landlords themselves and the importance of why to look seriously. Because the next step coming down the road is a lot of people are thinking about basically suing the landlord because of the amount of care and medical costs. Because the children after lead poisoning, they should put more thought into what they're doing to the public, you know.

Response 23A: ***Comment is noted. With regard to questions about lead on the exterior of buildings, DGEIS Section 2.2 the Ordinance "will require the presence of deteriorated lead-based paint on the interior and exterior of pre-1978 residential structures and on the exterior of pre-1978 nonresidential structures to be identified and correctly addressed." The Draft Ordinance provides a mechanism to identify and address lead exposure in residential/rental properties, and represents a preventive measure because the intent is to prevent human exposure to lead before it happens.***

Public Comment 24. <u>Jeanette Zoeckler</u>

Comment 24A: So thank you everyone for paying attention to lead and children in this community. I am working for SUNY Upstate, I'm trained in public health. My expertise though is really more around the workers' health and how the workers are affected who go in and abate lead. But I come to you also as a mother today, because I was a mother raising children in the City with a child with elevated lead. And so I sort of have training but I also have sort of a closed heart to it as well. Just a quick pass over the Ordinance. I definitely go with Alternative 1, which has more strict standards. And lowering the lead levels in children in this nation, and I hate to see Syracuse missing out again on the best of what we can do. And I want to see this lead Ordinance brought up to the standards that EPA and HUD have, while removing those barriers so eloquently brought out tonight. That's what we see over and over again in the community. There is an opportunity for some change, it's really secondary prevention. Some kids are already affected when these matters are going on. When we know that these houses, all, many of them, almost entire neighborhoods really need the attention. So while I commend this, I really do think in this comment period this body should accept some more expertise to look over. And if I can find, just quickly, that you know, we're going to need to have more stringent standard of a hundred

micrograms per square feet for the window trough. That's what's in play. So you have to be very practical about this and come up with some penalties for landlords who don't comply. But they have this ability to just quickly get out of it. Those loopholes need to be closed. And if you want to look to some people that have done this: In Utica, New York, low blood lead levels were lowered and children's IQ points were raised. And also Rochester. So there is no reason Syracuse can't do this. I thank you for your time and energy on it. I look for greater collaboration between the Department of Health and other bodies that I could name here. So we should work a little more, but work quickly, because there just isn't time.

Response 24A: ***Comment is noted. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5, which includes dust-wipe sampling in high-risk areas. Regarding EPA/HUD standards, see Response 2B. The Ordinance applies to all City neighborhoods and properties therein, with additional dust-wipe sampling to occur in high-risk areas. The City will not issue a Certificate of Compliance or Rental Registration Certificate for a property that is not in compliance with the Ordinance. The Department of Codes Enforcement will retain the right to enforce penalties for failure to comply with the Ordinance.***

Public Comment 25. <u>Jesse Harasta</u>

Comment 25A: (Summary) Commenter is a Syracuse resident and professor of social science at Cazenovia College. Commenter conducted a research project along with students in order to try to test the questions about exactly what is it in the social context of high impacted neighborhoods that's leading to greater amounts of peeling paints and that's not present in similar neighborhoods with low impact. Preliminary data suggest that the most significant factor between high impacted and low impacted neighborhoods was peeling paint on the exteriors of buildings. This demonstrates that if the City wishes to intervene and question about the rates at schools and other settings are certainly important. But the first point of easiest intervention is to stabilize paint in the buildings. One other piece emerging from the research, relates to lead poisoning in the historic sense. Maps of elevated blood lead levels for 1998 show that the neighborhoods that are today being discussed as high risk neighborhoods were seen as historical neighborhoods for higher risk in 1998. 22 years ago researches identified those places as being problematic, and still continues to be so today. Commenter believes this reinforces the fact that if we want to

intervene to stop lead poisoning we need to take a special microgeographical approach we're looking at specific neighborhoods, and approve Alternative 1.

Response 25A: ***Comment is noted. The City appreciates the research effort described by the commenter. The Ordinance is intended to prevent and reduce human exposure to lead paint by addressing the presence of lead paint in and on residential buildings, in line with the commenter's suggestions. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Public Comment 26. <u>Oseanna Fair</u>

Comment 26A: I have a home on the south side of Syracuse that I first rented and then bought from the Syracuse Land Bank. I am also a member of Families for Lead Freedom Now, I am the qualified branch leader. I did not think 38 years later I would be standing before you still talking about lead poisoning. Lead poisoning has now become generational for my family. I still take care of a 40 year old brother who suffered severe lead poisoning on the south side of Syracuse. And now 38 years later I find out that my granddaughter has lead poisoning from my own home. We have o be better, we have to do better. Looking over the Draft Ordinance that you guys have out, the outdated dust wipe clearance levels, the ones that are listed in the Ordinance have been updated in January by HUD. So we need this language to be strong in this Ordinance. We need that new information to be added to the Ordinance. Families with Lead Treatment Now prefer that you have Alternative 1 of the Ordinance. My other question for this body is how do we plan to enforce compliance with this Ordinance or enforce the inspection? Since compliance with the Rental Registry is so low, how do we place to get this across? This is important. Our children are suffering. Thank you.

Response 26A: ***Comment is noted. See Response 2B regarding alignment with EPA/HUD clearance standards. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5. The Department of Codes Enforcement will retain the right to enforce penalties for failure to comply with the Ordinance.***

Public Comment 27. <u>Charlene Fair</u>

Comment 27A: I'm Charlene Fair, and I do own a home in the City of Syracuse, and obviously it's affected my family. I'm in the Families for Lead Freedom Now. We do have concern. The landlords do not complete work to proper standards. And the problem that is several points that allow landlords to pass up standard work or to delay work for an unacceptable period. We want recommendations: Do not allow inspectors to release properties when only interim controls are in place. And to require the placement of internal controls in the case of inclement weather of over a week, and to remove the loopholes for abatement work done by landlords or unpaid family members.

Response 27A: ***Comment is noted. See Response 2N.***

Public Comment 28. <u>Matracia Powell</u>

Comment 28A: I am basically working with the Democrat Socialist organization and I found out just how bad the lead problem is in Syracuse, and I was absolutely shocked, and I really wanted to help do something about that. So I really am happy that this Ordinance is now being drawn up. One of our concerns is that the Ordinance doesn't provide definitions for these key terms: Commissioner, Director, and Department. And it is a problem that could lead to legal challenges that would take the lead Ordinance in a court of law. So we think that it should be more creative to find more. And support the Alternative 1 because we believe it is stronger than Alternative 2.

Response 28A: ***Comment is noted. See Response 2G. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Public Comment 29. <u>David Michel</u>

Comment 29A: I'll be very brief. I must say hearing this conversation of all the HUD requirements I'm glad I retired. As some of you know, my wife Peggy used to work in childcare for 4K, and here's hers, she can't come tonight but here's her comments. I'll be very brief. I think the people in the audience and the report has described the problem is with lead paint. The surrounding support for the lead paint Ordinance, particularly Alternative 1. As Peter Dunn in the Community Foundation said, the missing link in the efforts to combat lead. As you heard a lot of things coming out, more funding, a lot of collaboration a between the City and the County and that's good. -that's good. I'm also on the board of Housing Visions, and their Syracuse project also

addresses the lead problem. In some ways in building new homes such as up on the Square project and substantial rehabilitation of existing structures. The projects on the north and east side of the City. Also collaborating with the City and Home Headquarters and the nearest new initiative to build 200 new homes. Our only caveat, and I think Councilor Majok referred to this, it is important when you pass this Ordinance that there be sufficient resources staff and training to implement the Ordinance. I think a couple of you have said that. And was encouraged to read in the paper that proposing two new inspectors. I hope in the budget you would keep that in mind.

Response 29A: ***Comment is noted. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5. Staffing and funding considerations will be addressed by the City prior to the Ordinance taking effect.***

Public Comment 30. <u>Peter Knoblock</u>

Comment 30A: I'm a resident of Syracuse, I've been here for 60 years. 50 years ago in my capacity as a child psychologist I began evaluating children with documented high levels of lead. And as has been documented here today, their health and educational needs are extensive. Continued to see these youngsters over the years. And the families struggle to find school programs and providers who recognize their needs. I'm fond of the notion of pay now or pay later. And so I appreciate your efforts to document and initiate the strongest possible initiatives.

Response 30A: ***Comment is noted.***

Public Comment 31. <u>Marianna Kaufman</u>

Comment 31A: I'm a resident of Syracuse, I'm a physician, I'm a parent of two young children. I've sat on the boards of the CNY Solidarity Coalition and currently on the Syracuse Peace Council, and I'm active in several organizations that are concerned with social justice and interest in public health. I commend the Council for taking this really important initiative to take a look at this preventable crisis and to give it the appropriate concern that it deserves. I strongly support the Ordinance, and I strongly support Alternative 1. I do have, in reading through the Ordinance, I do have one concern about the definition of what is considered permanent. The bill defines its goal is to create permanent protection from lead. The removal of the lead can be considered permanent. But

encapsulating the lead with paint should not be considered permanent. And especially paint that encapsulates the lead on exterior surfaces in Syracuse is not going to be permanent, it's not going to last twenty years. It might last several years, especially on outside surfaces. So the recommendation would be to redefine the term permanent as a lead remediation, the permanent removal of walls or soil bearing lead paint. And that we should define encapsulation as abatement. And so the language should be changed that encapsulation should be continued to be inspected on a regular basis.

Response 31A: ***Comment is noted. See Response 2N regarding items of a legal nature or related to construction of the Draft Ordinance. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5. See Response 2C - the Draft Ordinance provides mechanisms to ensure ongoing compliance as property conditions may change over time. Inspections would occur upon renewal applications for the Rental Registry and Certificates of Compliance for rental properties at three-year intervals, and the complaint process empowers tenants to report concerns about sources of lead exposure. Use of the term "permanent" is addressed in Response 2D.***

Public Comment 32. **<u>Crystal Cosentino</u>**

Comment 32A: I work for Home Headquarters as a Deputy Director. Thanks for the opportunity to speak tonight. Home Headquarters has been committed to creating, preserving, and financing healthy housing. Since we first opened our doors back in 1996. As a Community Development Financial Institution we have often financed home improvements that not only improve the quality of housing -- a new roof, repair sewer lines, new furnace, and also improves the occupants' health. In 2015, together with the CNY Community Foundation and many community partners, many of them here tonight, we embarked on the creation of the Green and Healthy Homes Initiative of Greater Syracuse. A national model focused on Coordination and collaboration and a single stream intervention process to address green, health, and safety issues in the home. Our City here and Our County along with nine other partners signed a compact committing to this work. In 2017 Home Headquarters and the Green and Healthy Homes initiative of Greater Syracuse facilitated several meetings to develop a prioritized approach to prevent lead poisoning. Our vision was to see a decrease in lead hazards in the built environment and a decrease in the number of children with elevated blood lead levels. While ambitious, we knew this would be attainable. It contained four focuses areas: Policy and enforcement, the built environment,

health and medical and community awareness and education. Many activities are underway to address lead and its impacts. The approach is multifaceted and comprehensive, and we are beginning to see real impacts from our activities. The nearly 300 page Draft Environmental Impact Statement outlines in detail the need for this. From understanding how lead, even in small quantities, is impacting children in our community through data contributed by the local Health Department to a scan of housing conditions here in the City. Currently we have a reactionary system. A child is poisoned and then we mobilize services. Wouldn't a system where we address lead before it becomes a problem be a far better way of handling things. It would reduce stress, health and economic impacts caused by lead poisoning. We echo others, like the Community Foundation, who have already shared in other venues that an Ordinance such as this will help us remain vigilant, proactive and collaborative. The City's efforts, through this Draft Lead Ordinance, will comprehensively improve housing quantity and resident health. Home Headquarters is in support of the City amending its property conservation code to include addressing and correcting the presence of deteriorated lead-based paint. And we appreciate this public meeting to learn more, and we expect to submit written comments before the March deadline.

Response 32A: ***Comment is noted. The purpose of the Lead Abatement and Control Ordinance is to identify and correct lead-based paint hazards, in order to prevent and reduce human exposure to such hazards.***

Public Comment 33. **Bobby Carroll**

Comment 33A: My name is Bobby Carroll, I just moved here in August, I've been here in Syracuse. One thing about that I wasn't aware of was that there is like an online place you can look up where there is lead poisoning in certain properties and whatever. If you have to go to a physical building to do that, so for me coming from out of State, that's kind of a burden, I'm sure other people have an issue with that. Might be nice to know like from not only the community you're trying to rent from that the entire property has issues with that. It would be nice to have a sort of transparency in an online database, instead of a physical building. So just wanted to bring that point up. And then wanted to reiterate that Alternative 1 should be considered. That's the stronger option for the Ordinance.

Response 33A: ***Comment is noted. See Response 2F.***

Public Comment 34. <u>Mary Cunningham</u>

Comment 34A: I mostly agree with Marianna Kaufman who was talking about. I've lived in Syracuse in a 1914 house for years and a 1920 house for 13 years. The idea of encapsulating the outside paint is a wishful thinking for twenty years. I know what it takes to take care of a house. So I want to stress to you we really need to make it maybe what is suggested possibly every six years but certainly needs to stay under regular supervision and not just be pushed under the bridge. One of the things we know is that lead poisoning, we can only identify it in children, but it lasts their whole life. And it affects them and their families and our community. That we are looking at not 418 or 468 children in the year, it's over 22 years, it's over many years that we are accumulating. We have a huge number of children, really incredible number of children who are affected their whole lives. And the expense to their family and we as a community could be ameliorated if we would take care of it and spend the money now and push for the County to put in more money. There is more money there, there should be more than 3.5 million.

Response 34A: ***Comment is noted. See Response 2C – the Draft Ordinance provides mechanisms to ensure ongoing compliance as property conditions may change over time. Inspections would occur upon renewal applications for the Rental Registry and Certificates of Compliance for rental properties at three-year intervals, and the complaint process empowers tenants to report concerns about sources of lead exposure. Also see Response 21C which addresses DGEIS content related to community impacts – the FGEIS Executive Summary and corresponding text in Section 2.2 provide updated descriptive information and additional context. Funding considerations will be addressed by the City prior to the Ordinance taking effect.***

Public Comment 35. <u>Evan Brzostowski</u>

Comment 35A: I'm a member of the American Iron Front, we are a group that's kind of antifascists in the area. And I was wasn't really planning on coming up here today. But it really caught my attention and to me it just kind of seems like a no brainer to be perfectly honest. As the professor over there said, that this has been going on, the last study was in 1998. I was born in 1998, so this is something that's been going on since, you know, I was a little me down here you know.

Especially this should be put through. And Number 1 should be put through especially as well. So that's my personal opinion. Thank you for letting me come up here.

Response 35A: ***Comment is noted. Per DGEIS Section 2.2, the Draft Ordinance aligns with Alternative #1 as described in Section 1.5.***

Public Comment 36. <u>Nathan Currier</u>

Comment 36A: My name Nathan Currier, I'm a student at OCC, part of the American Iron Front and SRA as well. So I want to speak on the tenants' rights issue. If there is any sort of legislation bill that goes through involving this, tenants need workers' rights for people that have to deal with the lead paint removal should be one of the utmost priorities. I remember one of the Council brought up that one of the tenants and landlord, pretty much being screwed out with tenants not being able to receive any sort of help or aid due to that. That should almost be criminal. As someone who is actively participating in the harm of others, without knowing the information of like what lead can do.

Response 36A: ***Comment is noted. DGEIS Section 3.3.2.3 addresses measures to protect tenants from potential retaliation by landlords in response to the reporting of suspected lead-based paint hazards to the property owner or City.***

Public Comment 37. <u>Mary Traynor</u>

Comment 37A: I'm here on behalf of the Syracuse Tenants Union, also an attorney with the Legal Services of Central New York. And I was at the committee meeting this afternoon, which really had no surprises. And I just really say that we need to focus on the enforcement mechanisms here. Our Code Enforcement Department, well intentioned as it may be, is really failing this City in a big way. The Rental Registry has not really worked the way it was intended to. I think that it could be amended in many ways so that just to improve enforcement. And we need to get serious about fines. You know, all these programs seem to be reactive, where they're triggered by a little child being poisoned. And then the big thing is how do we get the landlords to accept our public funds, our money, okay? And if they don't do it, what happens? Nothing. So we really need to look at that part, because if we're not going to follow through and make sure that the buildings and the apartments are fixed, you know, the tenants will be evicted, there is no

protection from that. So they would be just, you know, one family move out and another family move in. And nothing will change, you know. And the problem, I believe you said you had about 76 applications in, that 70 were not completed. So that's not working. That's not working. And I would hope that there is a new plan to fix that. Like I would hope codes has a plan to actually fix these things. Instead of just, you know, continuing business as usual year after year. I know two or three years ago you first started talking about lead and here we're considering an Ordinance. It's a huge improvement.

Response 37A: ***Comment is noted. Staffing and funding for enforcement will be addressed by the City prior to the Ordinance taking effect.***

Public Comment 38. **<u>Greg Smith</u>**

Comment 38A: I'd like to talk about the dust wipes. Using the term investigation in finding what was the source of a problem. And this is very much a forensic sort of thing. I've worked, I'm a landlord, and my family and my crew and I have been working in the west side on a daily basis for 40 years providing safe housing. But anyway, you have to find what the vector is, how the lead gets into the kid. Now, dust on the floor. Little kids crawl around on a dirty floor, get dirty hands and dirty toys in their mouth. That's pretty simple. But how did the lead get on the floor? Now as far as the dust wipes go, I think we need to differentiate between lead from an environmental source and lead from the structural source. Now if you have deteriorated lead or any kind of a violation or you've done any kind of renovation work. Yes, that falls completely on the owner, he owns the problem. It's your obligation to prove that you've done everything right and that you've cleaned it up. But if you get a case where there is no visible deterioration, there is no, you know, say for example, you've got a place that's been abated. And it has dust wipe fails. Well, clearly the dust was tracked in. Now Home Headquarters has a very informative video. And one of the things that they recommend for people to protect their kids is simply take your shoes off at the door. Because there is a legacy of lead in our environment from leaded gasoline that was around for years. And virtually all dirt has a certain percentage of lead in it. So the lead that gets tracked in. Yes, this is an issue. It's essential though a housekeeping issue. And the reason I feel we need to distinguish this is, one, I don't view housekeeping as within the scope of the services we provide. And I don't think any landlord does either, you know. If we make this something that the landlord is responsible for, the protocol will be that every three years somebody goes in with a mop, right ahead of the guy with the dust wipe, and wipes it up and you get a dust wipe and it

passes. You know, think back to when you were cramming on the last exam you took. Do you remember any of that stuff? And that's exactly the analogy here. What you've got is every three years you've got a very sterile surface that passes the test, but we don't address the ongoing problem. Now we're patterning this after the law in Rochester which was very successful in lowering high lead levels, but actually not so much on low lead levels. So they have an okay program. But you know what, okay is not okay. If we're going to solve this problem, everyone needs to work together. And what we need to do, we're going to be losing a teaching opportunity if we convey the impression that these housekeeping things that are critically important to reducing levels on the landlord issue, we need to use this opportunity to get the parents involved in protecting the children also.

Response 38A: ***Comment is noted. See Response 20B.***

Public Comment 39. <u>Stephanie Kenific</u>

Comment 39A: I'm a resident of Syracuse, I'm a teacher, and I am also a member of the Syracuse Party for Socialism and Liberation. I want to really echo and amplify what Comrade Bobby Carroll mentioned about the transparency of lead poisoning and abatement. Currently records are public, but only to those that can visit the office in person during business hours. As a teacher I know very well that information is not truly public until it is really accessible to all. That means digitally and available in multiple languages. The Party for Socialism and Liberation that I represent has experience in our neighboring Town of Geneva, New York addressing lead contamination in homes. We know well the painful realization that families in contaminated housing may face. That their homes can be poisoning them. It's the City's responsibility to ensure that families have all the necessary information in order to confront that terrible reality.

Response 39A: ***Comment is noted. See Response 2F.***

Public Comment 40. <u>Rich Puchalski</u>

Comment 40A: Executive Director Syracuse United Neighbors. Been around for 42 years, active on the south, near west side, Skunk City neighborhoods, where the highest concentration of lead houses are located. You know, kind of interesting to show up here at noon, getting blocked out from speaking on Council business. Now coming back and everybody has a lot of food for thought

for the Councilors. Do we thank Councilor Driscoll? Or did I get just lucky? You know, the Council office has money. I see the budget. It's too bad about 1,500 copies of the Ordinance on the table, Mr. Driscoll. Now it's too bad -- is it in the libraries? You know I understand the Ordinance doesn't have the strictest federal EPA lead levels in the Ordinance. Put it in there. You know after today the dust will settle, it will probably be a lot of lead dust. And where are we going? You know, is the energy going to transform to the neighborhoods on the south and near west side, for example? I want to see a public relations budget and an outline of what you are going to do. You know, it's kind of interesting you sometimes see banners downtown. Well, what about banners in the neighborhoods to talk about this? Once upon a time I got lucky and I got on the police van. That's a pretty expensive piece of taxpayers' money in the police van. Why not a lead van that rolls around in the neighborhoods, stops, maybe a couple of workers that live in that neighborhood that does outreach, and come on and see what the lead fight is all about. I want to see a budget. I want to see fliers, you know, anyway. And lastly, my last point, since you guys don't do anything, if you've got landlords that don t comply, send their name and address to the SUN office 1540 South Salina Street. Because this is enough. This is criminal what these landlords are doing.

Response 40A: ***Comment is noted. See Response 2B regarding clearance standards. Public outreach and education will be addressed by the City prior to the Ordinance taking effect. Codes enforcement reserves the right to enforce penalties associated with violations.***

Public Comment 41. **<u>Brendan Brooks</u>**

Comment 41A: I'm Brendan Brooks from Interfaith, LLC. Hoping to move to the south side relatively soon here. One of the things with the numbers. Three and-a-half million dollars, just looking at some of the data, like you're talking about addressing on average about 3 percent of the homes that are possibly affected. And we're only, if you don't have 70 of the 76 in full, I mean if we don't get the money committed I don't know how that works. I mean I'm a big proponent of supply and demand. If you show the work, you know, you can go ahead and get more funding. That's something I would really, if we canvass the neighborhood and get votes. If we go to the DSS and they have voter registration on back packets, you know that there is correlation between poverty and this issue. That's a hit list right there. You know, people that are on Section 8. People that are getting these services. Let's get out there and be proactive about it. That's all I've got.

Response 41A: ***Comment is noted.***

Public Comment 42. <u>Peter King</u>

Comment 42A: I actually, from what I've read of the document and from what I understand from what I hear, I completely approve of this as a first step. I think it's an excellent step. Long needed in Syracuse. And I think also that the comments made today also are very good at strengthening this document. The one thing I might say also, I am a Syracuse resident, is that a lot of the problems that seem to encompass or potential problem points relate to what's called in the literature your expose all. How an individual might come to be cumulatively affected by lead. And so these are all kinds of sources. There is literature specifically about Syracuse and about, for example, the soils, vacant lots. There is actually a number of ways that that can happen. And so just in the sense of a liability, maybe to be aware of that literature. But also as in forward thinking, why stop with just the housing, there is a lot of potential of remediating the soils. There is actually ways to remediate soils that have been done in places like New Orleans, and also in Norway and other countries. This is a worldwide problem. One concept which could be pursued is braiding funding so that you have HUD funding, you have other kinds of funding, so you get funding from different sources and you mix different educating the younger buyers before they buy these homes before their children are affected, because I've seen it with my own eyes. I see it happening. So I just want to let you know, you're preaching to the choir because I'm part of that issue. So I do hear you and I appreciate everybody coming out and giving us your information and our thoughts.

Response 42A: ***Comment is noted.***

Final Generic Environmental Impact Statement
for the City of Syracuse Proposed Lead Ordinance

Appendix E – Attachment A

Public Comments Received

Final Environmental Impact Statement
for theCity of Syracuse Proposed Lead Ordinance

Appendix E – Attachment A

Public Comments Received

To the NBD staff:

I'm writing to express support for the new law that would allow city code inspectors to test for and cite lead paint violations.

I'm retired now but spent my four-decade career working in early childhood programs. I know the lifelong impact lead poisoning has on young children. Children who have elevated lead levels suffer cognitive and neurological damage that can affect learning, concentration, judgement and behavior. Reducing the number of children exposed to lead in their environments may be one of the most important tools we have to support school success and reduce poverty in our City.

We're a city that has shown it can work with partners to take on big, complex problems and implement effective solutions. Childhood lead poisoning is one of those problems. We've built a coalition of ready community partners willing to help. Please ensure that Syracuse City government has the tools it needs to play a leadership role in protecting children from the terrible damage of environmental lead exposure.

Thank you.

Peggy Liuzzi

94 Xavier Circle, Syracuse, NY 13210

(315) 751-5314

CAZENOVIA COLLEGE

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February 11th, 2020

Sir or Madame:

Thank you for the opportunity for public comment on the draft environmental impact study and forthcoming legislation around the prevention of childhood lead poisoning. I am pleased to see the City taking seriously this scourge which causes permanent brain damage to hundreds of our children yearly. I will attempt to keep my comments as brief as possible, but will err on the side of thoroughness due to the severity of the issue.

My name is Jesse Harasta and I have lived in the city of Syracuse for the past fourteen years as both a renter and a homeowner. I raised my stepson within the SCSD and have lived in a two-family rental unit in the University Hill neighborhood while our downstairs neighbor's infant was lead poisoned. I have also served for the past five years on the Board of Syracuse Cooperative Federal Credit Union, where I have seen issues of housing and poverty from an institutional perspective.

However, in these comments I will be primarily commenting as a scholar of lead poisoning. Since receiving my doctorate in Anthropology at Syracuse University in 2013, I have been a faculty member at Cazenovia College in the program of social science. Two years ago, I became interested in the issue of childhood lead poisoning in Syracuse and, when I first heard of this proposed legislation, I designed a research study which I conducted with a team of methodology students in the Fall of 2019.

While the analysis and final write-up of that study is still in process, I have prioritized analysis of key elements in order to write up a summary that I have included below. The central question that we asked was: "what were the factors at work within Syracuse neighborhoods with a high incidence of lead poisoning that were not present in similar neighborhoods with low incidence?" We wanted to test the hypothesis that deferred maintenance (in particular of paint) in one to two family rental units was the most significant factor. While a more detailed summary is included below, our preliminary results demonstrate that there is an incontrovertible correlation between the presence of peeling paint in one-to-two family units and an increased incidence of lead paint. Our research strengthens the argument that the most effective single intervention to prevent childhood poisoning would be to require the maintenance of painted surfaces.

CONTINUED ON REVERSE

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www.cazenovia.edu

In addition to the summary of our research findings (which you will find immediately after this letter), I have also read through the GEIS and proposed ordinance and made point by point commentaries where necessary. These comments have been appended after the summary of my research findings.

Overall, I believe that this proposed legislation is a necessary (though probably not sufficient) step towards the ultimate goal of eliminating childhood lead poisoning in this city. I am happy to respond to any questions or concerns about the attached documents or issues surrounding lead poisoning in general. I can be reached at joharasta@cazenovia.edu, by phone at 315-655-7196 or by conventional mail at:

Dr. Jesse Harasta
Social Science
Cazenovia College
22 Sullivan Street
Cazenovia, NY 13035

Thank you for the time and effort you have placed in this issue.

Sincerely,

Jesse Harasta, PhD
Assistant Professor of Social Science
Cazenovia College

Preliminary Research Summary:

"Escaping the Scourge: Lead Poisoning and Microgeography in Syracuse, NY"[1]

(2019-2020)

RESEARCHERS: Dr. Jesse Harasta (Primary Researcher), Prof. John Livermore, Jennifer Forward, Don'dre Huddleston, Eric Humphrey, Prenajuah Jefferson, Roshawn Kershaw, Taetum Leffingwell, Devin Sanchez, Ian Watkins

For all inquiries contact: Dr. Harasta at joharasta@cazenovia.edu or 315-655-7196

ABSTRACT

This document is a preliminary summary produced for the public comment period on the proposed 2020 lead paint ordinance in Syracuse New York.

Over the course of September, October and November of 2019, a team of researchers based at Cazenovia College developed and implemented a multi-method collaborative community action research project on the Syracuse Lead poisoning crisis. The project tested the impact of varying environmental and socioeconomic factors in heavily impacted and non-impacted neighborhoods of Syracuse lead to susceptibility to lead poisoning in children. The project targeting two pairs of adjacent census tracts: Tract 54 (high incidence of poisoning) and 55 (low incidence); and Tract 15 (high incidence) and 16 (low incidence). Researchers travelled door to door conducting and distributing surveys and performing visual inspections of property exteriors and surroundings.

The study found a correlation between the incidence of peeling paint specifically and housing maintenance more generally and the neighborhood incidence of lead poisoning among children.

NATURE OF THE PROBLEM

The city of Syracuse, NY, has a lead poisoning crisis, one which threatens the cognitive, physical and social futures of children in a myriad of ways[2] [3]. In 2018 alone, over 5% of infants - over 570 individuals - tested were found to have lead in their system[4]. While this number is down from previous years - and this is potentially connected to a reported drop off in widespread testing rather than a solution to the problem - the city remains one of the most impacted by the toxin in the United States and the national significance of the crisis led to a

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[1] Funding for this project was generously provided by the Cazenovia College Division of Social and Behavioral Sciences

[2] "An Update on Childhood Lead Poisoning" (2017) by Hauptman, Marissa, Rebecca Bruccoleri, and Alan D. Woolf. In *Clinical Pediatric Emergency Medicine* 18;3 pp 181-92.

[3] "Sources of Lead and Steps to Reduce Lead Exposure in Homes, Child Care, and Early Learning Environments" (2016) by Schlieber, Marisa and Stacey Neuharth-Pritchett. In *Child Education* 92:3 pp 184-188

[4] *2018 Annual Report*. Onondaga County Health Department. Pp 13-14. Accessed online at: http://www.ongov.net/health/lead/data.html

dedicated visit by HUD Secretary and neurosurgeon Ben Carson in 2019 and a new $5.6 million Federal grant[5].

But underneath the general concern for children of the city, increasingly we have come to understand that not all children are equally at risk. Researchers have shown a deep relationship between lead poisoning, violence, poor educational outcomes and racially segregated poverty[6].

In fact, one of the defining features of Syracuse's crisis is its geographical nature. In a county with one of the nation's worst racial income gaps[7], that difference has become not only one of wealth but also of space, with neighborhoods containing one of the nation's highest concentrations of Black and Hispanic poverty[8]. The crisis of geographically concentrated lead poisoning closely tracks the crises of geographically concentrated poverty and race[9], a phenomenon that has been explicitly recognized since at least 1998[10].

Within this general context of geographically concentrated poisoning and growing public and scholarly concern, new lead prevention legislation was proposed based upon a similar bill from Rochester, NY. A key assumption of this new ordinance is that poor maintenance of small (one to five family) rental units - especially of surfaces with lead paint - was the key piece needed to prevent poisoning. This research was conducted to test that assumption, by asking whether peeling paint or other factors was more prevalent in high or low impacted neighborhoods.

Research Question and Key Variables

This research will build upon an unfortunately long tradition of understanding the complex ways that lead poisoning in Syracuse intersects with and reinforces segregation and poverty by both race and class. We understand lead poisoning to be both a cause and a product of long-term

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[5] "Ben Carson visiting Syracuse to discuss lead paint poisoning in children" in *Syracuse.com*, July 18, 2019; accessed online at: https://www.syracuse.com/politics/2019/07/ben-carson-visiting-syracuse-to-discuss-lead-paint-poisoning-in-children.html and "After Carson visit, Feds beef up lead-paint removal help; Onondaga County to ge $5.6 million" in *Syracuse.com*, September 20, 2019; accessed online at: https://www.syracuse.com/news/2019/09/feds-award-onondaga-county-56-million-for-lead-paint-removal.html

[6] "Neighborhood Trauma Due to Violence: A Multilevel Analysis" (2018) by Lane, Sandra, et. al. in *Journal of Health Care for the Poor and Underserved* 28:446-462

[7] "To succeed, older industrial cities must overcome their stark color lines" (2019) by *The Brookings Institute* Accessed online at: https://www.brookings.edu/blog/the-avenue/2018/05/07/to-succeed-older-industrial-cities-must-overcome-their-stark-color-lines/?utm_campaign=Brookings%20Brief&utm_source=hs_email&utm_medium=email&utm_content=62803362

[8] "Syracuse has nation's highest poverty concentrated among blacks, Hispanics" in *Syracuse.com*, September 6, 2015; accessed online at: https://www.syracuse.com/news/2015/09/syracuse_has_nations_highest_poverty_concentrated_among_blacks_hispanics.html

[9] "Global and Geographically Weighted Quantile Regression for Modeling the Incident Rate of Childrens Lead Poisoning in Syracuse, NY, USA." (2018) By Zhen, et al. In *The International Journal of Environmental Research and Public Health* Vol. 15 (10)

[10] " "A Tale of Two Swaths: Urban Childhood Blood-Lead Levels across Syracuse, New York" (1998) by Griffith, Daniel A., Doyle, Philip G., Wheeler, David C., Johnson, David L. in *Annals of the Association of American Geographers* Vol. 88 (4) p.640-665

structural violence, appearing at the fault lines of the social structure and - for the researcher at least - aiding in revealing their existence[11]. We developed the following research question:

In what ways do environmental and socioeconomic factors in impacted and non-impacted neighborhoods of Syracuse lead to: (1) susceptibility to lead poisoning in children and (2) restrictions to movement away from lead sources?

We do not theoretically differentiate "Environmental" and "Socioeconomic" Factors, instead understanding that there is a subtle interplay between them and instead approaching them through a holistic perspective. This is a list of the factors that we examined and the variables that we used to identify them in the two primary methods that we used (oral/written surveys and exterior building observation). We attempted to find at least one variable from each of our methods to connect to each of the factors in order to triangulate data, but were not able to do so for all factors. See Table 1 for a complete list of factors and connected variables.

Table 1 List of Researched Environmental and Socioeconomic Factors

Factor	Interview Variable	Observation Variable
Dietary Deficiency	Frequency of visits to full grocery store	Proximity to 'corner stores' and full grocery stores
Perceived Climate of Violence	Self-perception of level of violence	Presence of children and adults in public spaces
Parent-Caretaker Ability/Health	Self-perception of mobility	None
Ignorance of lead poisoning	Questions on the efficacy of lead poisoning prevention techniques	None
Deferred Maintenance	None	Visual observation of state of exterior paint and lawn
Rental versus Owner-Occupied	Self-identification as renter/owner	Visual markers of ownership
Lack of outdoor play locations away from lead-containing buildings	Identification of where neighborhood children play	Proximity to parks, presence of children playing in public spaces

METHODS

We engaged in the following methods: (1) a door-to-door closed interview/survey; (2) neighborhood observation; and (3) archival research. These methods were chosen to provide a mixture of quantitative and qualitative data, to achieve both representative data and maintain a broad and holistic perspective through qualitative data.

[11] *AIDS and Accusation: Haiti and the Geography of Blame* (1992) by Paul Farmer. University of California Press

The door-to-door closed interview/survey was conducted over the course of October and early November. An attempt will be made to access as many homes as possible in the four targeted tracts and an even balance of time spent in all of the tracts.

Project workers traveled in pairs along with a trailing vehicle working a street and a researcher collecting information on general conditions of the block. The researchers knocked on doors of all non-abandoned houses. When there was no answer, they deposited a survey with a SASE. Where there was an answer, the survey was conducted verbally. One project worker asked questions and the other recorded information. They also recorded visual data on the condition of the building, grounds and surrounding area. The researcher collecting information on the block walked up and down the block while the other team(s) were working, collecting information on the block as a whole, such as the condition of street lights, the visual presence of parks or corner stores and the number of people in the public space.

Population and Sample

Our population included the residents of two pairs of comparable census tracts within the city of Syracuse. Within each of the pairings there will be one neighborhood with poisoning rates within the worst quintile and one with rates within the best quintile. The tract pairs (15 and 16; 54 and 55) were chosen because they were (a) adjacent; (b) had a similar age (based on comparison of historic maps from 1831 onwards) and were constructed before 1978; (c) had similar population size and number of children under age four[12]; (d) had dramatically different incidences of lead poisoning over the previous five years[13]. Within each tract, rental properties of more than five units were excluded and streets were randomized for data collection; this data is summarized in Table 2. The tracts were also selected for their location within what Griffith identified as his "two swaths" in 1998, allowing for twenty years of time depth comparison[14]. These swaths closely follow the proposed legislation's "high risk areas".

Table 2 Comparison of Studied Tracts

Tract	15	16	54	55
Average poisoning rate (2013-2018)	19.88%	6.53%	25.62%	2.20%
Population overall	2,983	2,438	2,761	3,729
Population under age five	296	86	248	266

While perfect fits were not possible, preference was given for tracts with dramatic levels of difference in poisoning and similar age. The first tracts to be included will be the adjacent Tracts 54 and 55. 54 has the highest average poisoning of any in the city (25.62% of all children tested between 2013-2018) while 55 has the second lowest in the city, and the lowest of any neighborhood primarily built during the period of lead paint (2.20%). A survey of historic

[12] All population data is taken from the FactFinder tool of the 2010 Census. The tool is accessible online through: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_SF1_QTP1&prodType=table

[13] Lead poisoning data from 2013-2018 was compiled from the Onondaga County Health Department's Lead Poisoning Prevention Program website. Accessible online at: http://www.ongov.net/health/lead/

[14] Griffith, Daniel A., et all (1998) *ibid*

maps have determined that the two areas were considered the same neighborhood before the construction of Route 81. The second set of tracts were numbers 15 and 16. Between 2013 and 2018, Tract 15 had an average poisoning rate of 19.88% while Tract 16 had a rate of 6.53%. The difference of 13.35% was the greatest of any within Griffith's "northern swath".

RESULTS

The study had success in collecting sufficient data from all four tracts for statistical analysis. Our greatest amount of data came from the visual observation of homes and blocks. We recorded data on 349 residential units, with a roughly even division by tract; Figure 1: Data by Tract shows the breakdown of the census tract origin for this data.

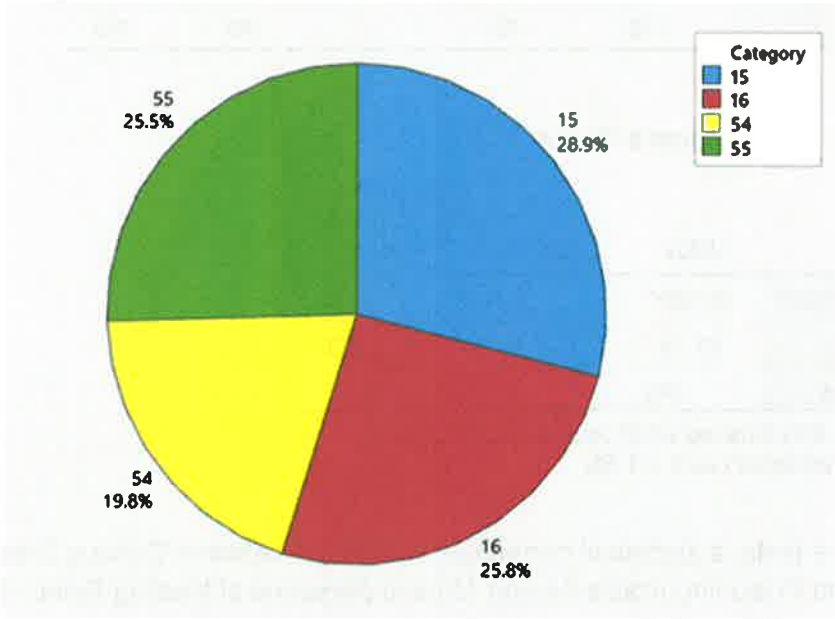

Figure 1: Data by Tract

Despite handing out or verbally requesting surveys for almost all of these units, our response rate on the survey was less successful. We had only 35 responses and so this data will be primarily evaluated using qualitative techniques and that analysis is not complete for the purposes of this report.

ANALYSIS

In preparation for the public hearing on the lead poisoning ordinance, testing was prioritized for variables connected to building maintenance. A Chi-Squared Test (see below) was performed to compare:

1. Incidence of Peeling Paint to High/Low Incidence of Lead Poisoning
2. Incidence of Peeling Paint to Tract 54 vs Tract 55
3. Incidence of Peeling Paint to Tract 15 vs Tract 16

Census Tract * Peeling Paint Crosstabulation

Count

		Peeling Paint				
		N	Other	No Data	Y	Total
Census Tract	15	43	5	0	53	101
	16	56	6	8	20	90
	54	13	4	0	52	69
	55	64	1	0	24	89
Total		176	16	8	149	349

Chi-Square Tests

	Value	df	Asymptotic Significance (2-sided)
Pearson Chi-Square	85.466[a]	9	.000
Likelihood Ratio	87.597	9	.000
N of Valid Cases	349		

a. 8 cells (50.0%) have expected count less than 5. The minimum expected count is 1.58.

In all three tests, a statistical correlation was found between Census Tracts with High Incidence of Lead Poisoning (tracts 54 and 15) and presence of Peeling Paint. This means that not only is there a relationship in general between the peeling paint and poisoning, but that this relationship held true in both our northside and southside tract comparisons.

This data has been visualized in two graphs, one depicting the differences in peeling versus non-peeling broken down by the four tracts (Figure 2) and by aggregating the High Incidence of Poisoning tracts (54 and 15) and Low Incidence of Poisoning tracts (55 and 16).

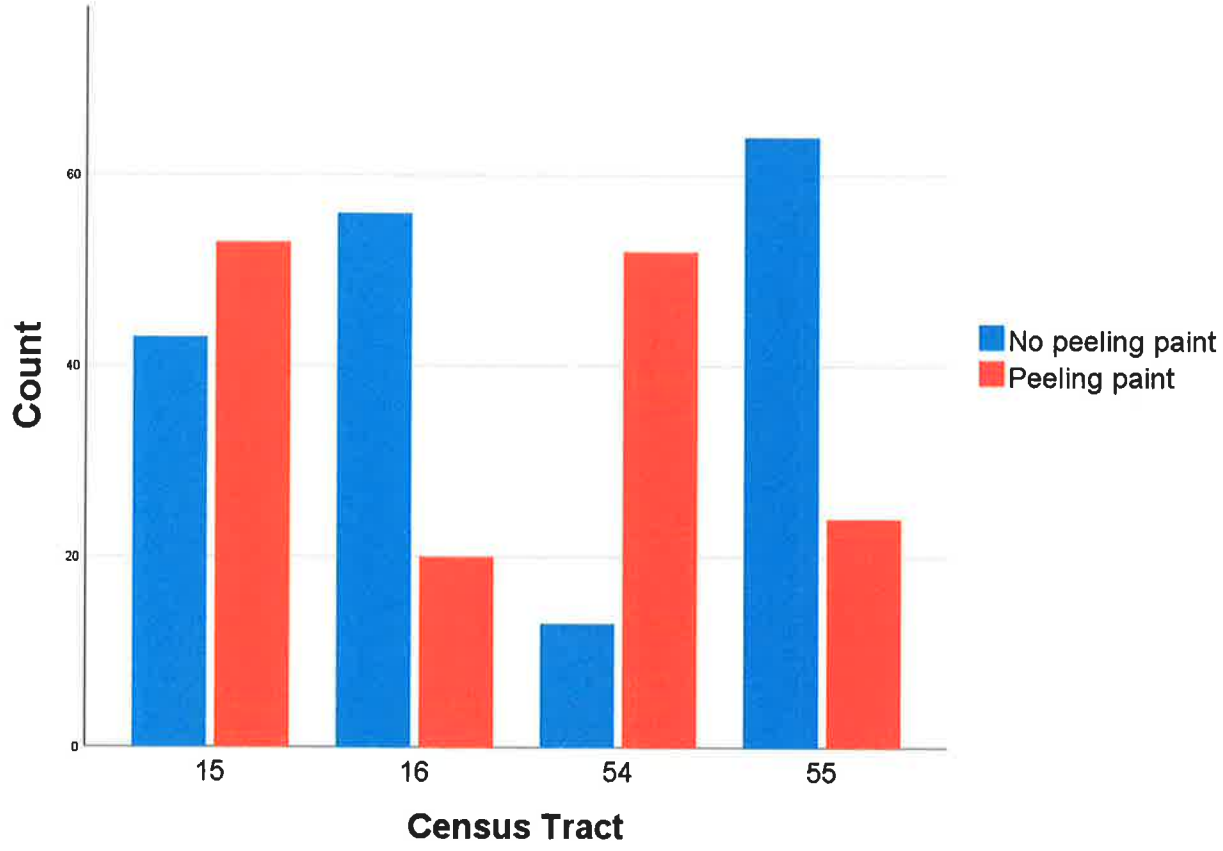

Figure 2: Peeling Paint by Census Tract

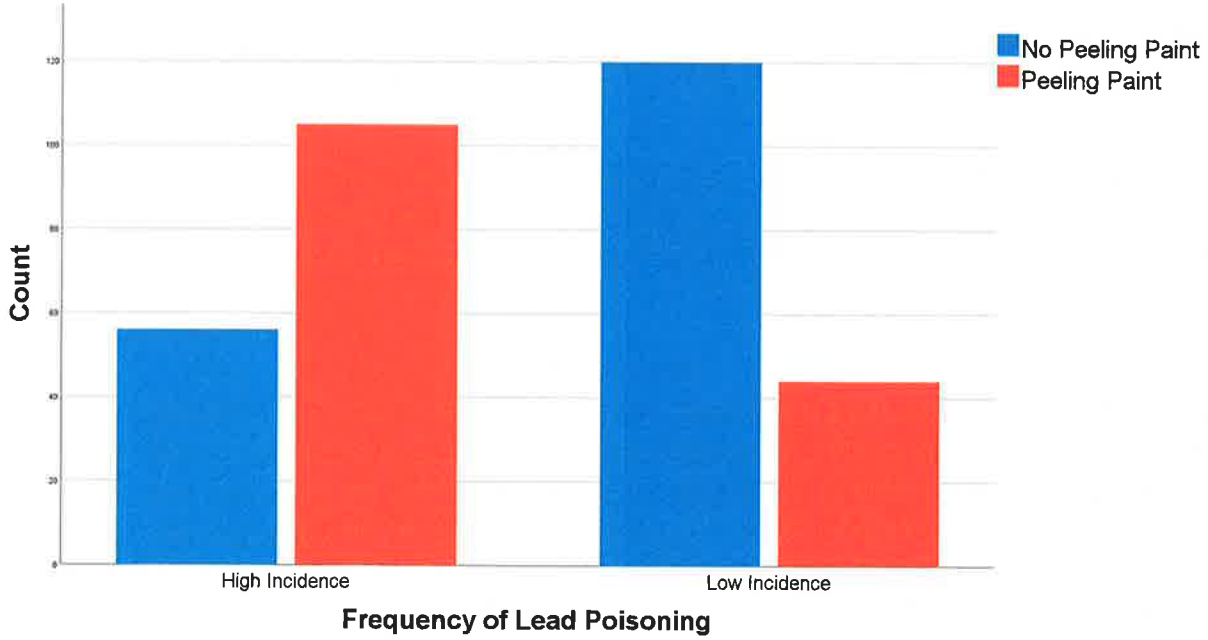

Figure 3: Peeling Paint by Frequency of Lead Poisoning

In addition the variable of peeling paint, a second set of Chi-Squared tests (see below) was performed to compare:

4. Incidence of Untended Lawns to High/Low Incidence of Lead Poisoning
5. Incidence of Untended Lawns to Tract 54 vs Tract 55
6. Incidence of Untended Lawns to Tract 15 vs Tract 16

Tended Lawn * High/Low Incidence Crosstabulation

Count

		Tract_Type		
		High Incidence	Low Incidence	Total
Observation Data	N	32	22	54
	Y	132	147	279
Total		164	169	333

Chi-Square Tests

	Value	df	Asymptotic Significance (2-sided)	Exact Sig. (2-sided)	Exact Sig. (1-sided)
Pearson Chi-Square	2.584[a]	1	.108		
Continuity Correction[b]	2.128	1	.145		
Likelihood Ratio	2.594	1	.107		
Fisher's Exact Test				.137	.072
N of Valid Cases	333				

a. 0 cells (.0%) have expected count less than 5. The minimum expected count is 26.59.

b. Computed only for a 2x2 table

In these tests, the relationship was not as strong, but still statistically significant (in the Fisher's test at the .1 level). The strongest correlation was in comparison of Tracts 54 and 55. It is worth noting that these are also the two tracts with the greatest difference in poisoning rates in the city.

Discussion

This research sought to test the hypothesis that a Syracuse city ordinance requiring the maintenance of peeling paint in dilapidated in one-to-two unit rental units is the most effective intervention for the prevention of childhood lead poisoning. While the quality of data has prevented a full exploration of all of the variables raised, it has convincingly demonstrated that there is a strong cross-neighborhood correlation between high incidence of childhood poisoning and peeling exterior paint and a weaker, but still statistically sound, correlation between the deferral of other types of grounds maintenance and high incidence of poisoning. Further evidence will be released once analysis is complete which may alert researchers to other relevant factors that may need to be independently addressed, but it would not eliminate the strength of this correlation.

This data reinforces the argument that municipal intervention to require landlord maintenance and pre-tenancy inspections would be an effective tool for the prevention of poisoning. Moreover, the dramatic differences revealed between the "high risk" zones identified in the legislation and surrounding areas of the city reinforces the need to keep that element of the legislation intact, if not reinforce it further.

Notes on the GEIS and Ordinance

Concern #1: Out-of-date dust wipe sampling clearance levels

- **Problem**: the written standards in the Ordinance fail to meet the current federal standards set by HUD and EPA for detecting dust-lead hazards.
- **Details**: In the ordinance, Section 54-7(D) "Clearance Standards," section (1) gives three values for dust sample results: (a) For floors: 40 ug/ft^2 (40 micro-grams per square foot); (b) For windowsills: 250 ug/ft^2; (c) For window troughs: 400 ug/ft^2.
  However, effective January 6, 2020, both the Environmental Protection Agency and the Department of Housing and Urban Development revised those standards to make them more stringent and more effective in clearing a dwelling.
  The new dust-lead hazard standards are as follows: (a) For floors: 10ug/ft^2; (b) For windowsills: 100ug/ft^2. Evidence for the change in EPA/HUD standards can be located at: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2018-0166-0360 and https://www.epa.gov/newsreleases/epa-and-hud-announce-new-lead-dust-standards-protect-childrens-health. HUD has fully implemented the standard: **https://www.hud.gov/sites/documents/LEADDUSTCLEARANCE.PDF**
- **Recommendation**: The Ordinance should be revised at Section 54-7(D) to meet EPA/HUD standards. Also, make the window trough standard more stringent – it should be lowered to 100 ug/ft^2.

Concern #2: Incomplete Definitions for Commissioner, Director, and Department.

- **Problem:** The ordinance does not provide definitions for these key terms and it is possible that this could lead to legal to challenges that defeat the Syracuse Lead Ordinance in a court of law.
- **Details**: Section 54-7 (I)(7) refers to "Commissioner"; however, Commissioner lacks mention in Section 54-2, DEFINITIONS, leaving the term meaningless in the ordinance legislation.
  Sections 54-4(D), 54-5(a), and 54-7(H) refer to an entity called "Department." However, "Department" is undefined in Section 54-2, DEFINITIONS, and, in spite of contextual material in the ordinance, the word is extremely unclear, if not meaningless in each of those references.
  The term "Director" is mentioned in 54-2 (in the process of defining the term CERTIFIED); 54-7(H), and; 54-7(I)(1 through 7). However, the term is undefined in Section 54-2, DEFINITIONS, and its meaning cannot be understood in context (except that its capitalization distinguishes it from "director") and is practically meaningless.
- **Recommendation**: To avoid legal challenges on this simple point, clearly define, in Section 54-4, the terms, COMMISSIONER, DIRECTOR, and DEPARTMENT.

Concern #3: Loopholes allowing for Landlords to not complete work to proper standards

- **Problem:** There are several points that allow landlords to pass substandard work off or to delay work for an unacceptable period.
- **Details:** 54-6-B allows the inspector to release the property if "interim controls have been implemented", but interim controls are by their nature temporary; similarly 54-11-B allows for a delay of exterior abatement because of inclement weather, but does not

recognize that inclement weather can last for months while children are still being exposed. 54-8-A states that abatement work must be done by someone with the proper EPA certification, but has a loophole for work done by the landlord or unpaid family members of the landlord.

- **Recommendation**: Do not allow for inspectors to release properties when only interim controls are in place. Require the placement of interim controls in the case of inclement weather of over a week. Remove the loophole for abatement work done by landlord or unpaid family members.

Concern #4: The Temporary Permanent

- **Problem:** The bill defines its goal is to create "permanent" protection from lead. Just as the only safe level of lead in the blood is having no lead in the blood, the only true permanent solution is the removal of lead from walls and soils. But the bill defines "permanent" as lasting 20 years. Yet, we know that no painted porch surface lasts twenty years in Syracuse. This means that buildings who have been encapsulated are exempt permanently from the ordinance's oversight, yet the "permanent encapsulation" of porches may only last a few years.
- **Details:** Definitions of "permanent" and "encapsulation" are found in 54-2
- **Recommendation:** Redefine "permanent" as lead remediation: the permanent removal walls or soil bearing lead paint. Define "encapsulation" as "abatement," and require properties through paint encapsulation be returned to the oversight of the bill with the following language: "given environmental conditions from Syracuse weather, houses remediated via paint encapsulation shall continue to be inspected every 6 years."

Concern #5: Which alternative should the city choose?

- **Problem:** There are two alternative versions of the bill. One (Alternative 1) is significantly stronger and the other (Alternative 2) is weaker and would not have sufficient strength to deal with the crisis.
- **Details:** Alternative 1 includes dust wipe sampling. Dust from lead paint is a major contributor to lead poisoning and should be included in any lead ordinance. Alternative 2 is similar to Alternative 1 except that there is NO dust wipe sampling in Alternative 2. Alternative 2 would be a much weaker choice of Ordinance for protecting children. Under Alternative 1, lead wipe sampling will occur in those areas defined as "high risk". Lead dust wipe sampling is a more comprehensive inspection as compared to visual inspection alone. Dust wipe sampling can identify small particles of lead contaminated dust not visible to the naked eye.
- **Recommendation:** The Common Council should accept Alternative 1

Concern #6: Transparency of information on lead poisoning and abatement

- **Problem:** Currently information about abatement and violations is publicly available but only to those who can come in to the office during business hours. This is not sufficient transparency when affordable digital options are available.
- **Details:** Section 3.3.2.1 "Property Transfer and Notification" (pp., 43-44) states the following: "*...the City will maintain a database, accessible to the public, of all residential properties where lead hazards have been identified, reduced and*

controlled… The City shall further maintain a database of all residential properties granted a certificate of occupancy. These databases will be available to "walk-in" inspection by the public."
Why are these two databases only available for walk-in inspection? Why shouldn't residents have access to this information about safety (HUD work is public dollars) and licensing of rental units (a public action)?

- **Recommendation:** Make the data not just public, but place it in an electronic database.

Concern #7: Protection for tenants against retaliation is below NYS legal standards

- **Problem**: New York law regarding tenancy changed in 2019 and this ordinance reflects the old standard.
- **Details**: Section 54-13 should be strengthened to protect tenants. Specifically, 54-13 (B) only grants protection for six months while current NYS law (passed after the Rochester version of this bill) gives a full year of protection including for circumstances specifically exempted from this law.
- **Recommendation:** Second 54-13 (B) should the text should change the time period for the rebuttable presumption from six months to one year, to be consistent with NYS law (see: https://www.nysenate.gov/legislation/laws/RPP/223-B). It should also be made stronger to protect tenants from retaliation (for one year) if they contact the Onondaga County or NYS Department of Health in connection with a concern over childhood lead poisoning. Language that should be stronger would be to use the phrase "any governmental agency (City or County or State)": "There shall be a rebuttable presumption that any attempt … to evict a tenant within **one year** after any report to any governmental agency (City or County or State) or the owner or any enforcement action in connection with…." Additionally, because of the many challenges to the warranty of habitability of many Syracuse rental units, for which tenants often withhold rent to encourage a landlord to make proper repairs, Section 54-13 (B) should strike the phrase: "except that in instances of nonpayment of rent".

Detailed Notes on the Executive Summary

- Section 1.1: The 2018 numbers for cases of new poisoning 446 (or 10.47%) are correct, but are significantly lower than previous years. The most likely reason for this decrease was fewer children tested, rather than an actual decrease in the number of new poisonings. It is better to use the 5 year average poisoning, rather than the most recent year. This issue also underlines the need for universal testing, including a reinstatement of WIC testing; without a continuation of previous testing standards, there can be no way to determine whether this ordinance will be effective.
- Section 1.1: The discussion of costs to the tax payer and New York state is based upon the 2003 Sindburn study. While this study has usefulness because it is focused upon New York, it is currently 17 years old. A more recent (2016) study worth looking at is the the Michigan Network for Children's Environmental Health

entitled "Costs of Lead Exposure and Remediation in Michigan: Update"[1] This study includes all of the same costs as the New York study, but also includes other factors including: the treatment of ADHD (21.1% of children with ADHD in Michigan have EBLLs), includes estimates of adult crime that occur at higher rates among those poisoned as children (the New York study focuses only upon youth crime), and argues that an average of nine years (rather than three in the New York study) of special education is more realistic for poisoned children. All of these factors point to the argument that the Swindburn study underestimated the societal costs of lead poisoning.

Detailed Notes on the Ordinance

- 54-1-J: While it is useful to estimate the cost of the legislation on the city's rental housing market, it would also be useful to estimate the potential cost to the city and its residents for inaction. In the introduction to the Draft GEIS, it is estimated that "New York state may have observed loss of nearly $78 million in tax dollars" from lack of future earning potential alone. This does not include the "need for special education" or "additional tax payer costs associated with criminal activity." Unfortunately, the Draft GEIS does not go further with local estimates.
- 54-7-D-1: Minimum lead dust sample results listed are all well above the established threshold for safe lead exposure which is 0 ug. There is no safe level of lead.
- 54-2: The definition of "permanent" is a 20-year encapsulation. Encapsulation involves covering, not removing, lead and should never be considered to be permanent. Even if one is willing to consider a 20-year encapsulation to be "permanent," it is clear that exterior paint in Syracuse - especially the crucially important front porch paint never lasts anywhere close to twenty years. We run the risk of having buildings noted as "permanently" repaired and removed from the purview of the bill and then once again becoming the source of poisoning in four or five years time when the porch begins to peel.
- 54-6-B: This section allows for a "violation… to be removed" if "interim controls have been implemented". However, under the earlier definition of interim control it notes that they are "measures designed to temporarily reduce human exposure". While this may be an important tool, a "temporary" solution does not meet the ordinance's standard of "permanency." If it is possible for inspectors to remove violations for interim controls, there will be no way to ensure that permanent treatments will ever be established.
- 54-7-B-3-A: Why is there a limit of "no more than four rooms"? Why not allow inspectors to determine the number of rooms based upon their judgement with a minimum of four rooms including one bedroom and the living room?
- 54-7-H: No timeline is given during which the complaints of tenants can be heard
- 54-7-D-1: These thresholds are out of date and are too high.

[1] Accessed at: https://www.michigan.gov/documents/deq/deq-dwmad-cws-Lead.Cost.Report.Designed.Final2016pdf_602173_7.pdf?fbclid=IwAR0FrpEHKM-T28byoDCi6xk-Q3OSiGESEI1mdedC4eKq0v5otWle-BPLBkU

- 54-8-A: This section states that "any home improvement contractor, property management firm, handyman or other person compensated for renovation work.... Must possess an EPA RRP certification". Many landlords - or their uncompensated family members - handle maintenance on their properties. I would suggest the language here be altered to also include property owners and to replace the term "compensated for renovation work" with "other person, compensated or not, who completes renovation work"
- 54-8-C: If the ordinance requires that the precise language of the sign be provided in both English and Spanish, why not provide the Spanish translation as well? This would save landlords paying for translation and potentially providing poorly translated information. We also suggest the use of visual images depicting poison or toxins in order to convey the message to the speakers of any of Syracuse's dozens of other languages.
- 54-8-D-1: Like in 54-8-C, why not provide the Spanish text as well as the English text? In addition, the final sentence of the letter reads "Retaliatory action against tenants is prohibited by 54-13 of the Municipal Code". This sentence could be re-written to be more user friendly and to assist tenants in understanding their rights. A potential rewrite could be: "It is unlawful for a building owner, or any person acting on his or her behalf, to take any retaliatory action toward a tenant who reports a suspected lead-based paint hazard to the owner or to the City. This includes rent increases, non-renewals of leases or interference with the occupants' use of the property." This language is drawn from Section 54-13 of the bill.
- 54-9: This section is misnumbered. It is listed as "55-9"
- 54-9-A-2: There is no standard here for where the tenants will be put up nor an explicit statement that this will be done at no cost to them.
- 54-9-A-2-D: This exemption is confusingly written and could be strongly disruptive to tenants' lives. There is too much opportunity for landlord abuse as the standards of "safe daily access" are not defined.
- 54-9-A-4: This section does not account for the fact that work may be completed but done to unfit standards. We recommend altering the first sentence to read: "In addition to the protections afforded elsewhere by law, if interior hazard reduction activities will not be or are not completed within 60 calendar days, or are completed but fail to pass inspection within 60 days, occupants..."
- 54-11-B: This section allows for a delay of abatement because of weather conditions. However, inclement weather that prevents exterior painting in Syracuse can last for months. Instead, we recommend that the bill require the implementation of "interim controls" under its own definition after a maximum delay of a week for inclement weather.
- 54-13-A: The protections from retaliation are too constrained as they only protect against reporting of suspected lead to "the owner or the city". We suggest expanding this to include the County Department of Health, their medical practitioner, and legitimate researchers and journalists.

- 54-13-C: The section that reads "tenancy was terminated pursuant to the terms of a lease as a result of a bona fide transfer of ownership" leaves open the very real, and very common, practice of landlords moving properties between various anonymous LLCs that they wholly own. Until we can ensure complete knowledge of the ownership of all LLCs, we can never guarantee "bona fide transfer of ownership". Therefore, this clause should be removed.
- 54-14: The incorrect chapter is included in this section, it should refer to "54-4", not "45-4"
- 54-15-B: Why is public access only available through walk-ins? Why not start in the digital age with an online database from day one?

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- ✓ NAT-RV-I-91969-2-EN
- ✓ NAT-RV-R-91969-2-EN

February 6, 2020

Department of Neighborhood and Business Development
201 E. Washington St Ste 600
Syracuse, NY 13202

RE: Additional Comment Regarding Draft Lead Ordinance

To whom it may concern,

Yesterday I submitted 13 comments regarding the proposed lead ordinance. I have one more comment:

In section **§54-7D – Clearance Standards**:

14. US EPA is considering lowering the clearance levels for lead in settled dust on floor and window sill surfaces. EPA reduced the Dust-Lead Hazard levels effective 1/6/2020 to Floors - 10 µg/ft^2, Window sills - 100 µg/ft^2. However, they failed to lower the Clearance standard to match the Dust Lead Hazard levels. By failing to change the Clearance level for floor and windowsills to match the Dust-Lead Hazards levels for these surfaces, it leaves us in an awkward position.

    Thus, we are making a determination that the lead dust on floor surfaces present a **hazard** when the lead dust level is **10 µg/ft^2** and the lead dust on windowsills present at hazard when the lead dust level is **100 µg/ft^2**. However, under the current federal clearance levels, we are going to allow for the unit to **pass clearance** when the level of lead in settle dust on floor surfaces when the lead dust level is below **40 µg/ft^2** and the lead dust level on windowsills is below **250 µg/ft^2**.

    While it is not required for the ordinance to be more stringent than the federal law, I recommend the ordinance set the Clearance standards for floors and windowsills to match the Dust-lead Hazard Levels. (10 µg/ft^2 and 100 µg/ft^2 respectively) and set the window wells to 100 µg/ft^2. These levels have been required since April 2017 for the HUD grantees. The HUD grants that the City of Syracuse and Onondaga County have are subject to these levels.

Thank you for your consideration.

Sincerely,

Patrick E Strodel, Operations Coordinator
Lead Safe, LLC

PO Box 12166 • Syracuse, NY 13218-2166 • www.lead-safe.com
Phone: 315-471-3210 • Fax: 315-703-9637 • Toll Free: 866-361-4777

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From: Daniel Izzo [mailto:dizzo45@gmail.com]
Sent: Thursday, February 6, 2020 2:06 PM
To: NBD
Subject: re Lead base Paint Financial Assistance for Lead Hazard Reduction is NOT available to owner occupants who have no children under 18

re Lead base Paint

Public Comment of DGEIS

c/o Department of Neighborhood and Business Development,

201 E. Washington St., Suite 600,

Syracuse, NY 13202.

Dear Sirs: Since **Financial Assistance for Lead Hazard Reduction is NOT available to owner occupants who have no children under 18 living is the property/ house or visit the property -**

1) I am opposed to requiring owner occupied housing units of One or Two Family homes in the City of Syracuse New York that is exempt and not part of the rental registry program be required to have their homes inspected for lead paint if there is no evidence of minors living at or visiting the property of an owner occupant of a one or two family dwelling in the City of Syracuse

Thank you

Daniel Izzo

512 Onondaga Ave

Syracuse, NY 13207

From: JAIME HOWLEY [mailto:jhowley8@gmail.com]
Sent: Thursday, February 13, 2020 4:38 PM
To: NBD
Subject: Fwd: Written Comments on the Lead Ordinance

I am speaking as the Co-Chair of the TNT Southside Housing Taskforce. Palmer Harvey, my Co-Chair and I, have run the Get the Lead Out Block Party since 2018 in the Brighton Neighborhood on the Southside.

26% of the children in that neighborhood have been identified with lead levels over 10. It is important to note that the acceptable blood lead level in NYS was lowered as of October 2019 when it dropped from 10 to 5 in order to match the levels acceptable lead levels according to the EPA and the CDC. With the lower level of 5, even more of our children in Syracuse are going to be identified as having childhood lead poisoning. The Brighton neighborhood (roughly equivalent to census tract 54) has many substandard rental units and vacant or abandoned houses with deteriorating lead paint on the interior and the exterior.

The NYS law was also written so that when that when the EPA and the CDC lower the acceptable lead level, NYS will automatically drop to that lower level. Remember that there is NO safe level of lead. The acceptable lead level has been continually reduced and children can still present with issues caused by lead even at levels under 5.

Childhood Lead Poisoning in Syracuse is as much of a crisis as Flint Michigan. In Flint the water was the problem while in Syracuse deteriorating lead paint is the problem. The same issues Flint is already facing will also face Syracuse. Flint schools are struggling to have enough special education services for lead poisoned children. Lead poisoned children need these services in order to be successful. The damage caused by lead is life long. Early intervention is the only thing that can help our children to succeed.

This lead ordinance is absolutely essential. Pass alternative #1 because it is the strongest option to protect our children now and in the future.
This is absolutely a social justice issue.

Syracuse must protect our youngest, most vulnerable citizens.
Thank you.

STATEMENT
LEAD PAINT ORDINACE HEARING
February 12, 2020

My name is David Michel. I live at 94 Xavier Circle, Syracuse.

My wife, Peggy Liuzzi, has worked in Early Child Care most of her career. I have worked in Community Development and Housing. We both recognize the seriousness of the problem of lead poisoning that affects young children; particularly those in the City's most distressed neighborhoods. This damage impacts children throughout their life creating long term human and financial costs for our community. Over 90% of the housing units in the City of Syracuse were built before 1978 when the use of lead paint was banned. These units need to be monitored and become lead safe.

We support the proposed Lead Paint Ordinance – alternative #1. As stated by Peter Dunn of the Community Foundation, this ordinance is the" missing link" in efforts to combat lead poisoning in Syracuse. It complements the many efforts by the City, County, and non-profit sector to address this problem.

For example: programs have been developed and funded to assist landlords and home owners to make their units lead safe. The funding commitments of the Community Foundation, the Federal government, the City of Syracuse, and Onondaga County are great.

I am on the Board of Housing Visions. Their Syracuse projects help address this issue by developing new affordable housing (Butternut Square) and undertaking gut rehabilitation of existing buildings (The Winston-Gaskins project on the City's East and North side). Housing Visions also is collaborating with the City and Home HeadQuarters to

implement the Mayor's initiative to build 200 affordable units. Housing Visions fully supports the proposed ordinance.

There is one caveat, for this ordinance to be effective, there must be sufficient resources to provide for effective code enforcement and the necessary training and staffing. The announcement that two new housing inspector positions will be created in the division of Code Enforcement is welcomed We urge the Council, in addition, to adopting this ordinance, to provide these resources as you consider future City budgets.

Thank You!

H | T | W

HOCHERMAN TORTORELLA & WEKSTEIN, LLP

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Geraldine N. Tortorella
Adam L. Wekstein

Noelle C. Wolfson
Henry M. Hocherman, Retired

March 2, 2020

Via Electronic Mail (nbd@syrgov.net) and (CodeEnforcement@SyrGov.net)

City of Syracuse
Department of Neighborhood and Business Development
City Hall Commons, 6th Floor
201 East Washington Street
Syracuse, New York 13202
Attn: Stephanie Pasquale

City of Syracuse
201 East Washington Street, Room 312
Syracuse, New York 13202
Attn: Ken Towsley, Director Division of Code Enforcement

Re: Comments on Draft Generic Environmental Impact Statement For City of Syracuse Proposed Lead Ordinance (Date Accepted By Lead Agency January 27, 2020)

Dear Sir/Madam:

We are writing to comment on the draft generic environmental impact statement prepared on behalf of the City of Syracuse (the "City") with respect to the proposed lead ordinance (the "DGEIS"). We understand that our comments will be addressed in the final generic environmental impact statement (the "FGEIS") and trust that they will be considered in formulating and taking action on the final lead ordinance. The following are our comments:

1. The criteria specified in the DGEIS for designation of "high risk areas" are internally inconsistent, amorphous, inappropriate, and conflict with those in the draft lead ordinance itself (which is DGEIS Appendix A). In particular, the DGEIS states on pages 9 and 14 that factors to be considered in delineating and designating high risk areas include, among others, Onondaga County Health Department inspections and elevated blood test levels observed during New York State mandated testing *and* that such factors will be used in concert with HUD guidelines for neighborhood revitalization strategy areas ("NRSA"). Similarly, page 53 of the DGEIS states that the lead ordinance will authorize city officials to identify high risk areas, "based on a number of factors *including, but not limited to*, Onondaga County Health Department inspections, and elevated blood-test levels observed during New York State mandated testing." In contrast, the draft lead ordinance itself (Section 54-6) states that the high risk areas will be based on the County Health Department inspections in

conjunction with elevated blood level tests (exclusively). Our specific comments on this aspect of the proposed action are as follows:

a. NRSA designation criteria[1] are not relevant; they relate to identifying distressed areas to allow greater flexibility in use of Community Development Block Grants in the specified neighborhoods. *See* DGEIS Appendix B. They should not serve as a basis for determining high risk areas to advance the entirely-different purposes of the lead ordinance;[2]

b. The designation of an area as an NRSA is unrelated to any finding that there is an enhanced risk of lead contamination/exposure, particularly to young children, in comparison to other areas of the City;

c. If employed by the lead ordinance, the criteria used to identify an NRSA may lead to designation of portions of the City as high risk areas, that do not present an enhanced risk to the primary target group -- that is, children of less than six years of age -- and, indeed, could result in designation of areas with low concentrations of children; and

d. The criteria currently included in Section 54-6 of the draft lead ordinance – that is, reliance solely on the Onondaga County Health Department inspection data and elevated lead blood level tests gathered through New York State mandated testing -- present appropriate standards and should serve as the exclusive criteria for delineating and designating high risk areas.

2. The DGEIS states at page 14 that "the means and methods for visual assessment, designation of high risk areas, and dust wipe clearance requirements will be established by the City, and will evolve as appropriate as a result of future health testing results, unknown data/research findings, budgetary considerations, or other unforeseen matter." The draft lead ordinance includes no such language suggesting that the designation standards will evolve. The criteria for designation of high risk areas should be precisely specified in the lead ordinance, and should not be subject to modification by the Mayor or other administrative officials of the City. If the standards for designation of high risk areas are to change, such changes should occur only by future amendments to the lead ordinance adopted by the City Council, actions which, in and of themselves, would be subject to review under the State Environmental Quality Act ("SEQRA"; collectively referring to Article 8 of the Environmental Conservation Law and 6 N.Y.C.R.R. Part 617). Unless the lead ordinance definitively establishes standards to designate high risk areas which are not subject to modification absent legislative action, the current SEQRA review of the proposed action would be incomplete and inaccurate. Depending on the standards employed to designate high risk areas, impacts on issues such as abandonment of rental housing, community character, the patterns of community growth and development and fiscal impacts

[1] As referenced in the DGEIS, the criteria for designation of NRSAs include that at least 50% of the housing was built prior to 1978; at least 50% of the households reside in rental property; a significant amount of residents are living in poverty; and at least 50% of the area is comprised of minority residents.
[2] We are not suggesting that the tracts currently identified as high risk areas in the DGEIS are inappropriate.

on the City, could vary widely. As a matter of equity, any changes in such criteria should be the subject of public notice to the potentially-effected land owners and residents.

3. The DGEIS expressly declines to assess the total potential costs that could be incurred by property owners and residents or the economic consequences that may result from testing and remediation of lead conditions. (See, for example DGEIS page 44). Therefore, it fails to provide any meaningful evaluation of the potential for: (i) abandonment of rental housing both in high risk areas and other portions of the City; (ii) disinvestment in high risk areas and reallocation of investment to other areas in or outside of the City and the resulting impact on businesses; (iii) impacts on availability and condition of housing stock; (iv) economic impacts on landlords; and (v) impacts on housing costs, in general, and the amount of rents, in particular. Once again, all of these issues relate to areas of the environment which must be studied, including impacts on neighborhood and community character, the pattern of growth and development and the fiscal impacts on the City (resulting from potential changes in the City's revenues and potential increases in municipal costs). The draft lead ordinance itself appears to recognize the importance of such economic data by including a blank space for such information. Section, 54-1(J), part of the "Legislative Findings" in the draft ordinance, states: "[a]ccording to the environmental impact statement, proposed lead-based paint poisoning legislation could have a cost impact on the rental housing market as high as $_____ depending on the alternative chosen."

4. The DGEIS is silent as to the number of additional employees and resources which will be needed to implement the lead ordinance, and the concomitant costs which may be incurred by the City in undertaking activities associated with the Ordinance, including, but not limited to, inspections, review of certifications and test results and enforcement. Nor does it discuss what additional revenue sources, such as new fees or tax increases, will be used to fund the City's fulfillment of its obligations under the lead ordinance. Again, this information is relevant to assessment of fiscal impacts on the City, and the potential diversion of resources currently used for other City programs and functions.

5. To the extent any additional fees or taxes may be imposed on landowners or residents their identification and quantification is necessary to assess the lead ordinance's impacts on the pattern of growth and development and neighborhood character.

6. The DGEIS includes no rational explanation for the exemption of owner-occupied housing from compliance with *any* of the meaningful requirements of the lead ordinance; in particular, the draft lead ordinance would exempt such housing from the requirements of Sections 54-4 through 54-6. Of course, such homes, particularly in areas that are designated as "high risk", have a significant likelihood of being occupied by the most at risk population -- that is, children under the age of six. At bare minimum, the lead ordinance should require that all residential buildings, rather than just non-owner-occupied ones, be maintained so that there are no deteriorated paint violations in accordance with Section 54-4. In addition, in order to constitute an effective means to combat the lead hazard, the lead ordinance should require visual inspections for deteriorated paint conditions and bare soil violations any time an owner-occupied dwelling undergoes an inspection in connection with the issuance of a building permit and/or certificate of occupancy, and, if required, associated dust

sampling, in accordance with the same requirements imposed on non-owner-occupied homes. The complete exemption for owner-occupied housing is also conceptually irreconcilable with the other exemptions in the draft lead ordinance for housing for seniors and all studio apartments. Such exemptions simply eliminate the requirement for dust sampling for such dwellings, but do not exempt them from the requirements of Section 54-4, that all buildings constructed prior to January 1, 1978 must be maintained so that no deteriorated paint violations exist. Clearly, the generic class of owner-occupied dwellings would have a higher likelihood of being inhabited by children younger than six than would senior citizen housing and studio apartments, yet the former is subject to less stringent restrictions than the latter. The disparate treatment has no logical, environmental or legal basis.

We look forward to seeing the City's responses in the FGEIS to our comments and hope that our observations will bring about amendments to the current draft of the lead ordinance so that it will target more precisely problems serving as the basis for its enactment.

Respectfully submitted,

Hocherman Tortorella & Wekstein, LLP

By: _____
Adam L. Wekstein

ALW:hc

5 March, 2020

Jennifer Tifft, Deputy Commissioner
Department of Neighborhood and Business Development
City Hall Commons, 6th Floor
201 E. Washington St.
Syracuse, NY 13202

Dear Deputy Commissioner Tifft,

Thank you for the opportunity to provide comments to the Draft Generic Environmental Impact Statement which includes the City of Syracuse Proposed Lead Ordinance. We run the Central/Eastern New York Lead Poisoning Resource Center, which is funded by the state Department of Health to help decrease the rates of lead exposure in children in our 31 county region. We commend the city leadership for working to establish stricter guidelines regarding lead-based paint hazards and to hold property owners and landlords accountable for safe housing. This will ultimately reduce children's exposure to lead hazards which is known to cause delays in growth and development, even at low levels.

Over ninety percent of the City of Syracuse's housing stock was built prior to 1978, when lead paint was banned from use in residential structures. Lead-based paint hazards remain the primary cause of elevated blood lead levels, putting nearly all residents who live in the City of Syracuse at risk. Children under 6 years of age continue to be the most susceptible to lead exposures due to their rapid growth and development and hand-to-mouth behaviors. At high levels, lead affects the brain and central nervous system and can lead to coma, seizures, and even death. Fortunately, we don't often see these effects in children anymore, but exposure to lead at low levels, which usually causes no obvious symptoms, remains widespread, affecting around 10% of children in Syracuse[i]. This low-level exposure can cause significant problems later in life such as reduced IQ, behavioral difficulties, and learning problems. Because these effects on learning and development are irreversible, it is crucial to prevent exposure in the community.

The Central/Eastern NY Lead Poisoning Resource Center's primary role is to provide clinical guidance to doctors caring for children with elevated blood lead levels in our 31 county region. At any given time, we are consulting on 15-30 children in Onondaga County, most of whom reside in the City of Syracuse, who have blood lead levels over 15 µg/dL. Once a child is exposed to lead, public health intervention and frequent follow up testing are needed to ensure the child is living in a lead-safe environment and that their blood lead level comes down. Medical treatment for lead exposure is necessary when levels reach 45 µg/dL or higher, which includes inpatient hospitalization and treatment over 5-7 days. We typically treat 10-20 children in the hospital annually in our region. It is likely that these children will have impaired cognitive development that will negatively impact the rest of their lives, and these human costs to them and their families are of grave concern. In addition, there is a significant financial cost to society, borne by the children's families, school districts, and healthcare payors (often Medicaid). Data from Columbia University indicate that every additional group of 1-2 year old children with a lead level above 5 µg/dL will cost over $904 million in NY state alone. These costs include $5.6 million in medical costs and $2.2 million in special education costs, $3.1 million in parental work loss, and an astonishing

$893.5 million borne by the child in the form of lost future income[ii]. As a society, we should not continue to allow these human and financial costs to accrue.

Primary prevention is the key to keeping children safe. Lead-based paint hazard control has shown multiple benefits including an overall increase in health, increase in IQ, higher lifetime earnings, higher tax revenue, reduced spending on special education, and reduced criminal activity[iii]. We fully support the proposed ordinance because it would help to actively seek out properties with lead-based paint hazards to ensure children are living in safe and healthy environments. We believe this will make significant impacts on the health and wellbeing of the children of Syracuse and their communities.

In addition, we want to bring to your attention the fact that the Pediatric Society of Onondaga County, an organization of local pediatricians, has previously voiced support for legislation to reduce lead exposure in children. Please see their attached resolution from May 2018.

Sincerely,

Travis Hobart, MD, MPH, FAAP
Medical Director

Elizabeth Domachowske, MPH
Program Coordinator

Central/Eastern NY Lead Poisoning Resource Center

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[i] http://www.ongov.net/health/lead/data.html
[ii] https://www.law.columbia.edu/sites/default/files/microsites/clinics/health-advocacy/new_york_cba_1_1.pdf
[iii] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2717145/

Pediatric Society of Onondaga County Resolution

ENDING CHILDHOOD LEAD POISONING

WHEREAS the Pediatric Society of Onondaga County (PSOC) is the professional group representing the general pediatricians and pediatric medical and surgical subspecialists who care for children in Onondaga County and the surrounding counties in central New York, and

WHEREAS the members of the PSOC have a professional obligation to advocate for the health and welfare of the children in their region, and

WHEREAS the damage to cognitive and behavioral skills caused by elevated lead blood levels in young children is not reversible and has life-long effects, and

WHEREAS the scientific evidence clearly shows that no amount of lead in the blood is safe, and

WHEREAS the primary source of childhood exposure to lead is deteriorating leaded paint manufactured prior to 1979 that is ingested or inhaled, and

WHEREAS approximately 90% of homes and apartments in Syracuse and 75% of homes and apartments in Onondaga County were built before 1979, posing great risk to our children, and

WHEREAS lead poisoning is a risk to anyone, disproportionately affecting young children of color and young children living in poverty,

BE IT THEREFORE RESOLVED that the members of the PSOC believe that all children deserve the opportunity to grow up in lead safe environments,

BE IT FURTHER RESOLVED that we support any and all efforts to repair and/or replace this dangerous housing using safe materials, and

BE IT FURTHER RESOLVED that we support the implementation and strict enforcement of laws aimed to ensure that all homes, rented or owner-occupied, are lead safe or lead free.

Adopted by vote of the PSOC, assembled for their regular meeting, on May 7, 2018.

From: Mary Cunningham [mailto:macunnin@hotmail.com]
Sent: Wednesday, March 4, 2020 8:31 PM
To: NBD
Subject: Lead Remediation Ordinance

I am writing to support a lead remediation ordinance that supports the lowest amounts of lead dust in the environment.
I also recognize that as the homeowner of old homes in the city for 43 years, that is wishful thinking that painting the outdoor porches, house windows will last for 20 years and thereby encapsulate the old lead paint. That is not substantiated by my experience or by many of us. When paints is used to encapsulate lead, it should be recognized that it is temporary at that regular 3 year inspections should be part of a permanent follow up

I would also like there to be recognition that the money allotted to lead remediation is insufficient for the problem, but is a good beginning. However, we have thousands of children and young adults with permanent lead poisoning who need special services and support for the rest of their lives-through special education services in school, job training as young adults, mental health remediation for many, supportive living services for some for their whole lives and unfortunately, criminal enforcement services for those who cannot control their behavior. The expense and loss of skills and independence for so many is a burden on the individual, the family and the society. Somehow we need to make sure we spend money NOW to ensure that we do not perpetuate the creation of people with disabilities and that we create people who can be part of and contribute to our community. This would be priceless. We need to push for remediation for people as well as homes.

Lastly, I hope that remediation at some point, makes protection for tenants who blow the whistle on landlords and also protect them from being priced out of newly remediated apartments.

Some of these things, I realize, are not in the purview of the ordinance. But as we pass the most stringent ordinance we should keep in mind the long term view and repercussions.

Thank you,
Mary Cunningham
43 year resident of Syracuse

From: ellen morrissey [mailto:erinsmom3293@gmail.com]
Sent: Wednesday, March 4, 2020 2:09 PM
To: NBD
Subject: Lead Ordinance

Dear Sir/Madam:

On behalf of the Branch Leadership of Families for Lead Freedom Now! please accept the following comment and recommendation related to the proposed Syracuse Lead Ordinance.

I am deeply concerned that the proposed lead ordinance fails to allow for, or encourage, lead hazard reduction in every unit of a two, three, or four unit dwelling, once one of those units has poisoned a child's family.

Just as all the electrical wiring should be inspected throughout a home if one unit has old wiring whose age threatens to cause a fire, every unit of a dwelling should be inspected for lead hazards if any single unit is discovered to have lead hazards.

It is tragic and unfair to let a house poison one family after another before every unit is checked and lead hazards get fixed. Further, given the age of the housing stock in Syracuse, it is completely reasonable to assume that a muti-unit dwelling where lead hazards are present in one unit will most likely have serious lead hazards that need fixing in all other units.

Additionally, if a potentially hazardous unit is rented by adults without children, it is unsound, and potentially reckless, policy to await the arrival of a family with children before taking action to inspect for fixable lead hazards.

As a result, I wish to recommend that the Syracuse Lead Ordinance include language requiring Code Enforcement inspections for lead hazards in every unit of a multi-unit dwelling (located within the high risk area) when any one unit is discovered to have a lead hazard.

And, further, that the presence of such lead hazard shall be communicated to the current tenant(s) and fixed immediately.

Thank you for your consideration.

Sincerely,

Ellen Morrissey
Eastside Branch Leader
Families For Lead Freedom Now

ST. JOSEPH'S HEALTH
A Member of Trinity Health

301 Prospect Avenue
Syracuse, NY 13203
315.448.5111

sjhsyr.org

Department of Neighborhood and Business Development
201 E. Washington St.
Suite 600
Syracuse, NY 13202.

March 3, 2020

To Whom It May Concern:

This letter is to confirm support from St. Joseph's Health for the proposed lead ordinance in the City of Syracuse. Allowing code inspectors to take dust swipe samples in pre-1978 structures - even where deteriorated paint is not visible – is a common sense environmental health mitigation tool that will serve the best interests of our city's most vulnerable residents. This new law will hold property owners accountable for ensuring that the residences they maintain for rental will, in short, no longer poison our community. Setting a standard to clear properties for residency with a contingency on lead testing further protects our community members who rely heavily upon rental properties and those who maintain them.

As one of the Central New York region's largest and most comprehensive health systems, St. Joseph's Health understands that good community health is about so much more than clinical care. Population health is largely dependent upon the social determinants of health, including access to affordable and safe housing. The data is clear; lead continues to poison our children in particular, resulting in behavioral, and neurological effects that impact a child's educational and decision-making aptitude. This lead ordinance has the potential, therefore, to impact the life trajectory of generations of children who will inhabit apartments in our city today and in years to come.

In addition to offering a mitigation effort to protect the health and safety of our city residents, the new lead ordinance also gives voice to community members who continue to be disproportionately impacted by numerous social and environmental health risks. While this ordinance alone will not address the whole of challenges faced by many City of Syracuse residents living in poverty, it is a critical step in support of health equity.

In alignment with our mission to improve the health of all populations we serve, St. Joseph's Health fully supports the proposed City of Syracuse lead ordinance.

Sincerely,

Leslie Paul Luke, President & CEO
St. Joseph's Health

From: Margaret Bombard [mailto:bombs4822@gmail.com]
Sent: Tuesday, March 3, 2020 8:13 PM
To: NBD
Subject: Lead Ordinance Public Comment

Dear Sir/Madam,

I am writing as a concerned citizen to express my support for the proposed lead ordinance being developed for the City of Syracuse. I have been a both a renter and a home owner in the city when my children, now 20 & 24, were small. I am also a healthcare professional that has worked with many inner city children for the past 20 years and am currently a landlord in an owner occupied 2 family residence a block outside the city.

Looking back now, I realize how fortunate we were that when I was expecting my first child, my husband searched and found a newly renovated upper flat on Tipperary Hill that had been redone and meticulously painted by a landlord who really loved and took pride in the property. Even though it was above our budget as a struggling young couple we moved in and that well kept apartment is where our daughter spent her first year. We later found an affordable home in Eastwood and bought our first house. I remember reluctantly staying at my parents' home over the summer with our daughter while my husband spent the weeks needed to really clean and paint our new place from top to bottom. Our 2nd daughter spent her first two years there. Both places were built well before 1978, and I realize now that I dodged a bullet that I didn't even know was out there, despite having read plenty of parenting books and visiting a private pediatrician regularly.
I also realize that my conscientious landlord, and my ability to stay somewhere stable while a new place was being prepped, is definitely the exception rather than the rule. So, now I feel I must advocate for those parents not as lucky as me, and especially for the children who have no control over the circumstances they are raised in but who have to live with the consequences of those surroundings for the rest of their lives. It is obvious from the lead poisoning statistics that the current method of enforcing safe housing is not working, so I feel it is time to move forward with a new plan.

After reading the ordinance, I would like to register my support for "Alternative 1" which allows for the designation of higher risk areas which would receive stricter guidelines-again, the statistics from the health dept make it clear this is needed. I would also hope that any landlord loopholes would be closed since the vast majority of landlords prove over and over again that if given the chance they will not do the right thing if there is an extra nickel to be made off of their tenants. We cannot leave the health of vulnerable children in the greedy hands of those who don't care about them or our community in general, so every important detail of how the work is done, including how long they can delay the work, need to be clearly laid out and enforced. The track record of local landlords also makes me feel that extending the retaliation period to at least a year rather than six months is necessary. Also, as a long time homeowner in Syracuse I know that it is very unlikely that any type of paint encapsulation would last 20 yrs. I hope that properties that have been "cleared" due to painting remediation will continue to be inspected at least every 5 years or so. Lastly, the city has such a great amount of information available on their website that I was shocked to hear that the lead violation and abatement information is not available online for parents to access. Even with all my advantages I can't imagine that as a young mother working full time I would have figured out how to come down to a government office during business hours to investigate the lead status of potential apartments.

I do have one other separate idea I would like to propose that maybe the health dept could consider: mandatory pre-discharge education for mothers leaving our hospitals with newborns about the danger of lead. Not just a paper or pamphlet given out and then thrown out, but a nurse that looks that mom in the eye and tells her that in as little as 5 months that newborn she's carrying home will be crawling and that what her little hands touch and ingest can alter her potential for life. And that if her home has not been tested and declared safe that now is the time to put that into motion, before it is too late.

Margaret B.

From: Mary Carney [mailto:mary.e.carney@gmail.com]
Sent: Saturday, February 29, 2020 2:02 PM
To: NBD
Subject: Comment on Proposed Lead Ordinance

To whom it may concern,

As a public health professional who formerly worked in lead poisoning prevention, I wholeheartedly support the City's Proposed Lead Ordinance. Given the devastating consequences of childhood lead poisoning, the City should make every effort to enact the strongest possible ordinance. For this reason, I support the option that includes designation of "high risk" areas and subsequent dust-wipe sample clearance protocols (Alternative 1).

I have two main concerns with the proposed ordinance, which both involve potential for landlord misbehavior. Concern #1 is that landlords will not strictly follow Lead Safe Work practices, even though they are required to do so by law. Having personally participated in the multi-day training on lead safe work, I know how stringent Lead Safe standards are. If the ordinance allows abatement work to be performed by a landlord or unpaid family members, it is highly unlikely they will follow the strict standards, because they are significantly more onerous than typical work. Unsafe work can do more harm to vulnerable tenants and their children, so I think the law should require the work to be done by certified professionals.

Concern #2 is that landlords will retaliate against tenants who report concerns about lead poisoning. As you are aware, landlords often raise rent, fail to do repairs, and evict tenants who they unfairly blame for causing the expense and legal hassle of having their property cited for code violations. I am not a lawyer and don't know the best legal mechanisms for protecting tenants from these issues, but I urge you to make sure the ordinance is as strong as possible on tenant protection.

Thank you again for your work to pass a Lead Ordinance in Syracuse. As a city resident, I want to see Syracuse stop the cycle of lead poisoning that continues to have devastating consequences for our children. A strong policy is our best weapon to change this story, and I urge you to pass and implement the strongest achievable ordinance as soon as possible

Sincerely,

Mary Carney

From: feruzi arnold [mailto:feruzi.m.arnold@gmail.com]
Sent: Monday, February 24, 2020 7:15 PM
To: NBD
Subject: Form Letter_Comments_Dust Standards

Name: FERUZI MURAIRI

Neighborhood I live in (optional):102 Greenwood place

Today's date: 02,24th,2020

Dear Sir/Madam:

I am writing out of deep concern over the crisis of childhood lead poisoning in Onondaga County, and particularly among families in Syracuse, New York. I hereby submit a public comment related to the proposed Syracuse Lead Ordinance.

As you may know, when Rochester, New York passed their Lead Ordinance in 2005, they used up-to-date scientific standards for finding dust lead hazards. Today, those scientific standards have been updated once again. However, the current version of the Syracuse Lead Ordinance uses the old, less-safe standards.

This is unacceptable. The Syracuse Lead Ordinance should include the most up-to-date safety standards for finding dust lead hazards that are recommended by the Environmental Protection Agency (EPA) and the department of Housing and Urban Development (HUD).

The updated dust-lead clearance standards from EPA and HUD are:

Floors: 10 micrograms per foot square (ug/ft^2)
Windowsills: 100 micrograms per foot square (ug/ft^2)
Window trough: 100 micrograms per foot square (ug/ft^2)

Please be informed that the updated standards can be found at these websites:

- https://www.regulations.gov/document?D=EPA-HQ-OPPT-2018-0166-0360
- https://www.epa.gov/newsreleases/epa-and-hud-announce-new-lead-dust-standards-protect-childrens-health
- https://www.hud.gov/sites/documents/LEADDUSTCLEARANCE.PDF

Please apply the most up-to-date standards for lead dust clearance levels to the Syracuse Lead Ordinance.

Thank you for your time and thoughtful consideration of these recommendations.

Sincerely,

Comments of the New York Attorney General's Office on the City of Syracuse's Draft Lead Ordinance

City of Syracuse
March 5, 2020

The New York Attorney General's Office (OAG) is pleased to submit these comments on the Draft Generic Environmental Impact Statement (DGEIS) for the City of Syracuse Proposed Lead Ordinance pursuant to the State Environmental Quality Review Act, ECL Article 8 (SEQRA). OAG commends the City for taking strong steps to protect its most vulnerable residents by addressing the serious public health risk posed by exposure to lead paint. We offer these comments to provide recommendations to consider that further strengthen the proposed ordinance.

Background

Lead is a highly toxic heavy metal that can adversely affect almost every organ and bodily system. In adults and children, lead exposure can result in a wide range of serious health problems, including neurological, renal and cardiovascular damage.[1] As a child's developing central nervous system is more vulnerable to toxicity, health risks associated with lead exposure in children are even more dire. There is no safe blood lead level in children.[2] Blood lead levels as low as 5 µg/dL in children's blood are linked with "increased diagnosis of attention-related behavioral problems, greater incidence of problem behaviors, and decreased cognitive performance as indicated by (1) lower academic achievement, (2) decreased intelligence quotient (IQ), and (3) reductions in specific cognitive measures."[3]

For much of the 20th century, paint with dangerous levels of lead was commonly used to paint the interiors and exteriors of residential buildings throughout New York, including in Syracuse. Limits on the level of lead in paint used in homes were imposed by New York State beginning in 1970, and the federal Consumer Product Safety Commission beginning in 1978. However, paint with lead levels higher than those limits remains on the walls and other surfaces of many apartments and other homes built before those limits were imposed. Even when painted over several times, lead from paint with high levels of lead is accessible to small children when paint peels, is on surfaces like window sills that small children

[1] Agency for Toxic Substances and Disease Registry, Toxicological Profile for Lead, 13-14 (May 2019), https://www.atsdr.cdc.gov/toxprofiles/tp13-c2.pdf.
[2] Centers for Disease Control and Prevention, Childhood Lead Poisoning Prevention home page. (retrieved March 3, 2020) Available at: https://www.cdc.gov/nceh/lead/prevention/default.htm
[3] National Toxicology Program, Health Effects of Low-Level Lead, xviii (June 2012), https://ntp.niehs.nih.gov/ntp/ohat/lead/final/monographhealtheffectslowlevellead_newissn_508.pdf

put their hands on and may chew, or is on surfaces like doors and windows where friction or impacts expose the lead and generate lead dust. As a result, paint with high levels of lead remains a pervasive and serious health risk for children in Syracuse, particularly children under six. According to the City of Syracuse's own rental data from 2019, about 98% of rental units in the city were built prior to 1978. DGEIS at 16. Recent studies indicate that 10.4% of children tested in Syracuse have an elevated blood lead level greater than or equal to 5 μg/dL.[4]

The Proposed Ordinance

Fortunately, lead poisoning is 100% preventable and the City of Syracuse is responding. The City is proposing to add to the city code an ordinance that meaningfully addresses the serious public health risk posed by lead paint in residential housing. The City's Ordinance defines methods that would more proactively control lead hazards before exposure occurs.

The DGEIS identifies three potential options. Alternative 1 mandates when lead inspections must be done, how lead abatement must be carried out, and includes provisions protecting tenants from retaliation from landlords when tenants report lead hazards to the landlord or to government. It also includes the designation of "high-risk areas"[5] where dust wipe tests could be required as part of inspections in addition to visual inspections. Alternative 2 is substantially the same ordinance, except that it does not include the designation of "high-risk areas" for dust wipe tests. Alternative 3 is the no-action alternative option required by SEQRA.

The New York Attorney General's Office strongly supports the adoption of a lead ordinance by the City and appreciates the consideration of tenant protections in both Alternative 1 and Alternative 2. Deteriorating lead paint from old housing stock places a disproportionate burden on low-income and minority children, and so we strongly recommend Alternative 1 due to the recognition of environmental justice concerns in the designation of "high-risk areas" for additional inspections.

We submit the following recommendations to strengthen Alternative 1, to better protect children from lead paint hazards in the home, and to protect tenants from retaliatory eviction or other action by their landlords. First, inspections should take place every three years and at tenant turnover. Second, all inspections should

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[4] See Onondaga County Health Department, Lead Poisoning Prevention Program, Lead Poisoning Prevention Data page retrieved 3/2/2020: http://www.ongov.net/health/lead/data.html

[5] The City defines "high-risk areas" as areas meeting all of the following criteria: 1) at least 50% of housing built prior to 1978; 2) at least 50% of households reside in rental property; 3) a significant amount of residents are living in poverty; and 4) at least 50% of the area is comprised of residents considered a minority population. DGEIS at 14.

include mandatory dust wipe sampling. Third, landlords should bear the burden of lead abatement related relocation costs. Finally, a private right of action for tenants should be established to prevent retaliatory action by landlords.

Inspection Every Three or Five Years and Upon Turnover

The City requires rental properties to register with the City every three or five years, depending on the size of the dwelling and the location of the property.[6] Both Alternative 1 and Alternative 2 mandate that as part of the registration, rental properties built before 1978 must be inspected for lead paint hazards. However, any property can be subject to heavy wear and tear, especially properties with child occupants and properties with heavy turnover. Families may also move more often than every three or five years, especially low-income families.

Under Alternatives 1 and 2, properties would be inspected more often only if a tenant makes a formal complaint, which also requires that the property be inspected. This schedule of inspections can be strengthened by requiring inspections every three or five years and at tenant turnover. Given that the dwelling is empty at turnover, it is an ideal time for any lead paint abatement, if any is necessary. Because the City cannot be expected to monitor tenants' activity, landlords should be responsible for initiating inspections at turnover. When any inspection is performed, a copy of the inspection report should be filed with the City. All inspections should be performed by an EPA certified inspector. The City should impose a penalty for landlords if they fail to comply with these inspection requirements.

Expanding Dust Wipe Sampling

We commend the City for its commitment to environmental justice and focusing on high-risk areas where lead poisoned children are most likely to live. We strongly support the requirement of dust-wipe sampling in these high-risk areas as required in Alternative 1. We recommend that the dust-wipe sampling as defined in the ordinance be expanded to all inspections, irrespective of what geographic area the dwelling is in or whether a visual assessment identifies any interior deteriorated paint violations. Dust wipe sampling is a vital part of a comprehensive strategy to prevent lead poisoning, as the City acknowledges itself. DGEIS at 37.

Robust Tenant Protections During Relocation

In Section 55-9 of the proposed ordinance, occupant protections during lead hazard reduction activities are laid out. Item A(2) states that "occupants shall be

[6] Owners of one- and two-family non-owner occupied dwellings must obtain a Rental Registry Certificate every three years, whereas the City issues Certificates of Compliance for three-four-, and five-family rental properties every three years in "high risk areas" and every five years in other areas. See Syracuse Prop. Conservation Code § 27-15(b) and §§ 27-131 and 133.

temporarily relocated during hazard reduction activities . . . and occupants who relocate to a unit not owned by their landlord shall not be liable for rent accruing during that time." DGEIS, Appendix A: Draft Lead Ordinance at 18. However, neither Section 55-9 or elsewhere in the ordinance does it explicitly state that the landlord must pay any costs associated with relocating the tenant, including any rent owned to another landlord--or rent paid to a relative or friend if the tenant selects to move in with one--during relocation. Nor does it explicitly protect tenants from eviction by that other landlord if the original landlord does not pay the rent. Both of those protections should be made clear in this section of the ordinance. Furthermore, it should also be stated that the tenant must be relocated to a comparable apartment in the same general location. Tenants should not be penalized for needed abatement of lead hazards in their dwellings.

Section 55-9(A)(3) states that "occupants' belongings in the containment area shall be relocated to a safe and secure area outside the containment area, or covered with an impermeable covering with all seams and edges taped or otherwise sealed." *Id*. at 19. Tenants should have some agency over what happens to their personal belongings over what may be a prolonged period of time. If the hazard reduction activities will cause the tenant to be relocated from the unit for a prolonged period of time, then the tenant should have the option of storing or relocating their belongings at the landlord's expense.

Further, Section 55-9(A)(4) states that "if interior hazard reduction activities will not be or are not completed within 60 calendar days, occupants shall have the right to terminate their lease and shall have no further obligation to pay rent under their rental agreement. . ." *Id*. While tenants should have this option, landlords could use this provision to force tenants out by not completing the work in a timely fashion. Landlords could also fail to renew month-to-month leases while hazard reduction work is being performed. The ordinance should also affirmatively protect the tenant's right not to terminate and, if on a month-to-month tenancy, to renew the lease, and landlords that attempt to perversely use the ordinance to evict tenants should be penalized.

Tenants Should Have a Private Right of Action Against Landlord Retaliation

Section 54-13 of the ordinance prohibits landlords from retaliating against tenants for reporting suspected lead-based paint hazards to them or to the City. Retaliatory actions include "any actions that materially alter the terms of the tenancy (including rent increases and non-renewals) or interfere with the occupants' use of the property." *Id*. at 21. The ordinance creates a rebuttable presumption "that any attempt by the owner to raise rents, curtail service, refuse to renew or attempt to evict a tenant within six months after any report to the City or the owner or any

enforcement action in connection with a suspected lead hazard is a retaliatory action in violation of this section . . ." except if the tenant is not paying rent or is committing waste. *Id*. After six months, retaliatory eviction is still available to the tenant as a defense, but there is no benefit of presumption. *Id*.

While the existence of this presumption for six months is a benefit to the tenant, more can be done to protect tenants from retaliatory action by landlords. First, six months is not aligned with New York state law. State law on retaliation by landlords against tenants creates a rebuttable presumption of retaliation for one year after a tenant makes a complaint or takes action to secure their rights. NY CLS Real P § 223-b(5). The ordinance should not be less protective than state law, it should, at a minimum, be consistent.

Just as importantly, in its current form, the ordinance only protects tenants once they are brought to court by their landlord. Some tenants may never get to that point. If the landlord raises the rent beyond what the tenant can pay, the tenant may choose to move rather than be sued by their landlord. The private right of action should allow tenants to sue their landlords if, within a year of a tenant reporting a suspected lead hazard to the City or the owner is subject to any enforcement action in connection with a suspected lead hazard, the landlord attempts to raise the rent unreasonably, curtails service, refuses to renew the lease or attempts to evict the tenant.[7] The tenant should be given the presumption that the landlord's action was retaliatory, and the landlord should have the burden of proving that the action was not retaliatory. If the tenant wins in any action about retaliatory behavior, whether the tenant is the plaintiff or the defendant, the landlord should be required to pay the tenant's attorney's fees and a statutory penalty to the tenant.

Conclusion

The Draft Generic Environmental Impact Statement (DGEIS) for the City of Syracuse Proposed Lead Ordinance, Alternative 1, is a strong, meaningful step to address lead hazards in Syracuse, especially for the most vulnerable citizens living in environmental justice communities. If adopted and implemented, Alternative 1 will reduce the likelihood of tenant exposure to lead and elevated blood lead levels

[7] New York State law states that landlords cannot refuse to substantially alter the terms of the tenancy in retaliation for making a formal complaint. Substantial alteration includes "the refusal to continue the tenancy of a tenant, upon expiration of the tenant's lease, to renew the lease or offer a new lease, or offering a new lease with an unreasonable rent increase." See NY CLS Real P § 223-b(2). The law also provides notice requirements for tenants when the landlord raises the rent more than five percent above the current rent and when the landlord does not offer to renew the lease, which prevent the landlord from immediately evicting the tenant upon the expiration of the current lease term without advance warning. See NY CLS Real P § 226-c.

in children. We urge its adoption, along with the recommendations articulated above, to better protect the citizens of Syracuse.

Thank you for your consideration of these comments, and we are happy to discuss the issues raised in them with you as would be helpful.

LETITIA JAMES
Attorney General of the
State of New York

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Environmental Scientist
Environmental Protection Bureau
Main Place Tower
350 Main Street, Suite 300A
Buffalo, NY 14202

Name: Aggie Lane

Neighborhood I live in: 300 block of Midland Avenue, Syracuse

Date: 2/25/20

Dear Sir/Madam:

I am writing out of deep concern over the crisis of childhood lead poisoning in Onondaga County, and particularly among families in Syracuse, New York. I hereby submit a public comment related to the proposed Syracuse Lead Ordinance regarding two items:

One: the standard for the presence of lead dust in the city-proposed Lead Ordinance needs to be updated to the EPA's and HUD's standard which are:

Floors: 10 micrograms per sq. ft.
Windowsills: 100 micrograms per sq. ft
Window trough: 100 micrograms per sq. ft.

Two: the tenant protection in the proposed lead ordinance needs to be strengthened so that tenants worried about the presence of lead in the rental can contact any city, county or state agency without fear of eviction by their landlord.

Thank you for your time and consideration of measures for improving tenant protections in the proposed Syracuse Lead Ordinance.

Sincerely,

Aggie Lane

Aggie Lane

PS This Lead Ordinance will also create local accessible job and contracting opportunities. Syracuse Build and the CNY Community Foundation should team up to train and place city residents wanting to be included in this lead abatement work. Reducing poverty in city neighborhoods through good jobs goes hand-in-hand with lead poisoning reduction.

PPS I tried to email this comment to NBD@sgrgov.net and it was blocked. This is why I am mailing it in.

Department of Neighborhood and Business Development

201 E. Washington St., Suite 600

Syracuse, NY 13202

26 February 2020

District 5 Resident

Dear Sir/Madam,

I am writing in concern pertaining to the *General Environmental Impact Study* that was recently released. It is quite obvious from the study that the dust wipe sampling is clearly out-of-date. Please see that the window trough standards become more stringent.

Secondly, and most importantly, it is imperative that loopholes allowing landlords to pass insufficient work must be amended. Several areas of the current law allow landlords to sneak by with out-of-code work and easily push to 'delay' work as they see fit. Allowing the landlord time to complete his/her job is not in complaint, it is the clear obstruction of justice for those most affected by these acts—the low income and disparaged sections of our city.

Seek to be a champion of change regarding transparency of the information collected concerning lead poisoning in our city. Make the data public. These are our children. These acts are shameful and steeped in the greed and selfishness of the landlord(s). Data made public makes the community stronger.

In solidarity,

Peter

Ken Towsley, Director of Code Enforcement
201 East Washington Street
City Hall Commons Room 301
Syracuse, New York 13202

February 5, 2020

Dear Ken,

On behalf of Syracuse Teachers Association and its 3200 members strong that serve the children and families of the City of Syracuse, we implore Common Council to take action, and pass the City's proposed lead ordinance.

As educators, we have seen firsthand the significant impact that exposure to lead has on our residents, especially our children.

Recent studies indicate that 10.7% (446) of tested children under age 6 in the City of Syracuse have elevated blood lead levels. Additionally, 87% of the children with elevated blood lead levels in Onondaga County reside in the City, where nearly all single, two, and three-family structures were built before 1978.

As educators we are especially concerned with the impact of lead poisoning on children. Their rapid cognitive and physical development during early childhood increases the health risk associated with lead exposure, and can lead to lifelong consequences.

This legislation is a necessary and important step in the direction of helping to keep families and children safe from the dangers of lead contamination and we the members of Syracuse Teachers Association fully support the ordnance.

William J. Scott LMSW
William Scott
President

Syracuse Teachers Association
450 West Kirkpatrick Street
Syracuse, NY 1320

Syracuse United Neighbors

1540 South Salina Street
Syracuse, New York 13205-1149

Phone: 315.476.7475
Fax: 315.476.4523
E-Mail: sun@sunaction.org

City of Syracuse
Department of Neighborhood and Business Development
201 E Washington St., Suite 600
Syracuse, New York 13202

March 3, 2020

Re: Syracuse Lead Ordinance
General Environmental Impact Study (GEIS)

Syracuse United Neighbors (SUN), a forty - three year old non-for-profit community organization active on the city's south, southwest, near west and Skunk City neighborhoods.

1. Dust Wipe Sampling: Lead ordinance should be the highest level implemented by HUD.

2. Provide Proper Definition in Section 54-4: COMMISSIONER, DIRECTOR and DEPARTMENT.

3. Executive Summary: should provide more historical figures of children under 6 years old with elevated lead levels in the last 6-8 years.

4. List all neighborhoods including those with high number of vacants where lead remediation is needed--- estimated costs to remove lead.

5. Alternative 1: includes dust wipe sampling. Dust from lead paint is a major contributor to lead poisoning and should be included in the lead ordinance.

6. Section 54-13 (B) Prohibition of Retaliatory Action --Inconsistent with Tenant Protection Act of 2019.

7. Section 54-13 (B) Prohibition of Retaliatory Action; Governmental Agencies.

8. Make the data about lead hazards and Certificate of Occupancy not just public but place it in an electronic database.

OUTREACH:

Getting the word out about the lead ordinance once it is passed in targeted neighborhoods like the near westside, Skunk City, southwest and southside.

There shall be a robust door to door effort to make the tenants and homeowners aware of the this ordinance, with door to door flyers, banners posted across the street along with a city mobile van full of instructional literature on how one can obtain grants and even loans to remove lead in their homes. This effort would be staffed by up to five city employees including housing inspectors. Community residents shall attend meetings with presentations as well as visit the van to obtain information about the lead program.

The Fire Department would join in this effort to educate and install fire and carbon detectors in occupied homes where there is none.

There is no reason why this effort should be repeated on the other sections of the city.

Thank you,

Richard Puchalski
Executive Director

This DGEIS appears documenting an excellent ordinance, given my lack in legal expertise. For a first step, the city must balance the need to get something done on a longstanding difficult problem, with applying nuance in laying blame and liability for making corrections, and benefitting rather than harming blameless low-income residents. So overall, I support this document and ordinance going forward, and I support the more stringent "1st alternative" proposed on page 15, including a prioritized focus on 'high-risk' areas, over a less targeted, more generalized "2nd alternative".

However, I will raise some concerns here regarding two potential issue categories in implementing this ordinance.
1) The soil ~vs~ paint concern.
2) Concerns about targeting low-income areas too harshly, without providing support in what we hope ultimately becomes a positive transition.

My proposed solution for both these concerns is, implement this ordinance using the most holistic means as possible. Value the potential community connections, in working through the issues which arise.

1) The soil ~vs~ paint concern.

In the Common Council's excellent public discussion session about the DGEIS on Thursday, Feb. 12, 2020, at least one landlord raised a concern, that they can do the best job they can, but if their residents don't somehow clean enough to keep out loose soils, these soils contain lead from gasoline which can potentially contaminate the house, as shown by dust wipes. This man's comment concluded with, landlords can't promise residents know how to clean their homes.

There is much significant scientific study about soil as a source for lead poisoning. On page 42 under part 3.2.5 'Environmental Conditions', I do disagree with the stated assumptions about paint being the only source for lead dust. Other studies strongly suggest how leaded gasoline used over a 60 year stretch (~1926~1987) distributed small and very bioavailable lead particles throughout urban soils and soils around highways (Laidlaw, & Filippelli, 2008). While the lead in leaded paint is often much more concentrated, the lead in soils can often be more immediately bioavailable (Ibid).

Some studies show how lead poisoning can occur simply from breathing resuspended lead dust in soils on hot, dry days. Dr. David Johnson of SUNY-ESF in Syracuse co-authored one key paper demonstrating how hot, dry weather was most strongly connected with seasonally high Children's blood lead levels in Syracuse, Indianapolis and New Orleans (Laidlaw et-al, 2005). The predictive model Laidlaw et al used was instrumental for understanding the mechanisms and conditions under which breathing resuspended lead 'aerosols' or dust can become poisonous.

Lead in soils can accumulate from multiple sources, including leaded gasoline, deteriorated lead paint, and former lead-generating industrial operations. These different sources can often combine in urban soils, concentrating lead in dangerous levels. Also, local construction and poverty conditions can increase bioavailable lead concentrations in soil, and render these soils

loose, unanchored by plant life. For example, some reports of housing demolitions in Syracuse suggest houses are simply torn down without regard for the resulting dust from flaking paints, and without adequate personal protective equipment (anecdotal, personal accounts). As a consequence, we might find high lead concentrations in vacant lots where children often play, as reported by some studies of Syracuse neighborhoods (Castro et al, 2019).

Taken as part of a larger body of work on the topic of lead in urban soils, Dr, Johnson's work on soils and lead in Syracuse demonstrates contaminated soils is a significant threat which merits strong policy responses. At least one country has adopted higher lead standards for all their playgrounds, Norway (Mielke, et-al 2010, 2011). The City of New Orleans has also adopted higher playground lead standards, with possibly some good results (Ibid).

There is some positive news regarding lead in soils, the lead concentrations seem lessening over time. No one has formally attempted explaining this long-term decline, but experts suggest lead maybe 'washing out' from soils over time, though streams into larger waterbodies and / or deeper in the soils (See Dr. Laidlaw's website, www.urbanleadpoisoning.com>). This would make sense if the lead particles from gas and paint are highly chemically mobile, unlike naturally occuring lead. However, in Syracuse, we do know the soils are often so compacted over time, as to render some tree root growth difficult (Craul & Klein, 1980). If the I-81 viaduct project gets underway without regard to loose soils, some highly leaded soils could become exposed and generate breathable lead dust without people knowing.

Some Cities have developed policies which can prevent exposure from lead dust during development activity, most notably New York City's Brownfield program and Office of Environmental Remediation (OER). I will write another comment later, regarding potential soil programs and policies the City of Syracuse might consider.

My second concern is,
2) Avoiding targeting low-income areas too harshly, without providing support in what we would hope ultimately becomes a positive transition.

* In implementing policies which will drive off some landlords and attract new ones, can the policy find ways for preventing harm on residents from this intensive process? For example, rapid construction can generate harmful lead dust, while people are nearby.
* Improving neighborhoods creates amenities, which can potentially attract wealth. One 'second-order' social effect from this ordinance might be, accelerating gentrification in Syracuse, before residents can match rising costs with rising incomes. Methods for countering accelerating gentrification might include, providing some resources for residents interested in becoming adequately trained and credentialed in EPA-certified lead-safe practices.

Thank You,
Peter King, Syracuse.
Email = <pking27@pm.me>

References

If useful, I have posted an open bibliography including most of these studies, on 'Zotero' online, ***'Soils & Lead -CNY'*** at <https://www.zotero.org/groups/2349953/soilslead-cny>

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https://www.leadfreefrisco.com/wp-content/uploads/2011/03/2011-online-Soil-intervention-lead-safe-childcare-project.pdf

Families for Lead Freedom Now!

February 25, 2020

Department of Neighborhood and
Business Development
City of Syracuse
201 E. Washington St., Suite 600
Syracuse, New York 13202

Dear Sir/Madam:

We, the undersigned Branch Leaders of Families for Lead Freedom Now!, submit the following seven (7) concerns and related recommendations for changes to the proposed Syracuse Lead Ordinance.

We submit these concerns and recommendations in accordance with the 30-day comment period, running from February 5, 2020 through March 5, 2020 afforded under the New York State Environmental Quality Review Act.

The urgency is great for adoption of new practices to make Syracuse housing safe from lead hazards. We, and the families we represent, suffer from the system shortfalls in Syracuse's health and housing infrastructure that are easy enough to correct where there is leadership and a willingness to do so.

For the sake of our children, and the well-being of all children in Syracuse, we urge adoption of these (or very similar) changes in order to make the Syracuse Lead Ordinance a viable and practical tool that can effectively and significantly reduce the annual cases of childhood lead poisoning in the City of Syracuse.

Thank you for your thoughtful consideration.

Sincerely,

North, South, East, and West Branch Leaders
of
Families for Lead Freedom Now!

Ellen Morrissey
East Branch Leader

Feruzi Arnold
East Branch Leader

Oceanna Fair
South Branch Leader

Aurora Pille
South Branch Leader

Bonfrida Kakwaya
North Branch Leader

Gabriel Mkandama
North Branch Leader

(Out of town)

Darlene Medley
West Branch Leader

Comment 1

Text of the Lead Ordinance: Dust wipe sampling clearance levels for DGEIS Alternative 1.

When Rochester, NY passed its lead ordinance in 2005, it used the then-current EPA and HUD dust-wipe sampling standards. As of January 6, 2020, those standards have been upgraded. The new standards are more stringent. The final text of the Syracuse lead ordinance should use the current, higher safety standard for lead dust wipes to detect dust-lead hazards. These standards should apply to Alternative 1 in the Draft General Environmental Impact Statement.

In the proposed Syracuse lead ordinance, Section 54-7(D) "Clearance Standards," section (1) gives three values for dust-lead samples:

(a) For floors: 40 ug/ft^2 (40 micro-grams per square foot);

(b) For windowsills: 250 ug/ft^2;

(c) For window troughs: 400 ug/ft^2.

The updated dust-lead hazard standards are:

(a) For floors: 10ug/ft^2;

(b) For windowsills: 100ug/ft^2;

(c) while EPA's January 6, 2020 update is silent on window troughs, HUD already has a standard of 100ug/ft^2.

Our Recommendation: The Ordinance should be revised at Section 54-7(D) to meet EPA/HUD standards, including making the window trough standard 100 ug/ft^2 (which is the current HUD standard).

Evidence for the change in EPA/HUD standards is available at:

https://www.regulations.gov/document?D=EPA-HQ-OPPT-2018-0166-0360

https://www.epa.gov/newsreleases/epa-and-hud-announce-new-lead-dust-standards-protect-childrens-health

HUD has fully adopted each threshold. HUD's standard should be Syracuse's standard:

https://www.hud.gov/sites/documents/LEADDUSTCLEARANCE.PDF

Comment 2

Definitions in the Ordinance Text

There are incomplete Definitions for "Commissioner," "Director," and "Department." We are concerned that this failure to provide proper definitions could make the Syracuse Lead Ordinance unenforceable, unworkable, or otherwise encounter serious legal challenges.

Section 54-7 (I)(7) refers to "Commissioner"; however, Commissioner lacks mention in Section 54-2, DEFINITIONS, leaving the term meaningless in the ordinance legislation.

Sections 54-4(D), 54-5(a), and 54-7(H) refer to an entity called "Department." However, "Department" is undefined in Section 54-2, DEFINITIONS, and, in spite of contextual material in the ordinance, the word is extremely unclear, if not meaningless in each of those references.

The term "Director" is mentioned in 54-2 (in the process of defining the term CERTIFIED), 54-7(H), and 54-7(I)(1 through 7). However, the term is undefined in Section 54-2, DEFINITIONS, and its meaning cannot be understood in context (except that its capitalization distinguishes it from "director") and is practically meaningless.

Our Recommendation: To avoid challenges to the ordinance on this simple matter, clearly define, in Section 54-4, the terms, COMMISSIONER, DIRECTOR, and DEPARTMENT.

Comment 3

DGEIS "EXECUTIVE SUMMARY"

The first paragraph, third sentence, woefully under-represents the seriousness of the problem we face in Syracuse. Unfortunately, it fails to fully capture the intense need for a good, solid Ordinance and, in particular, the need for Alternative 1.

We are concerned with two matters. One, the sentence incorrectly quotes the number of children who were detected in 2018 by the Department of Health with lead poisoning in the City of Syracuse. The sentence states the number is 446 for the year 2018.

However, by following the citation for the data (the source cited is the *Annual Report from the Onondaga County Health Department. 2018 Annual Report.*) one is linked (see page 13 of *Annual Report*) to publicly reported Lead Testing data. According to our reading of the charts, in 2018, testing protocols resulted in identifying 498 children in Syracuse with elevated blood lead levels (EBLLs), not 446 as the DGEIS states (see: http://www.ongov.net/health/lead/data.html).

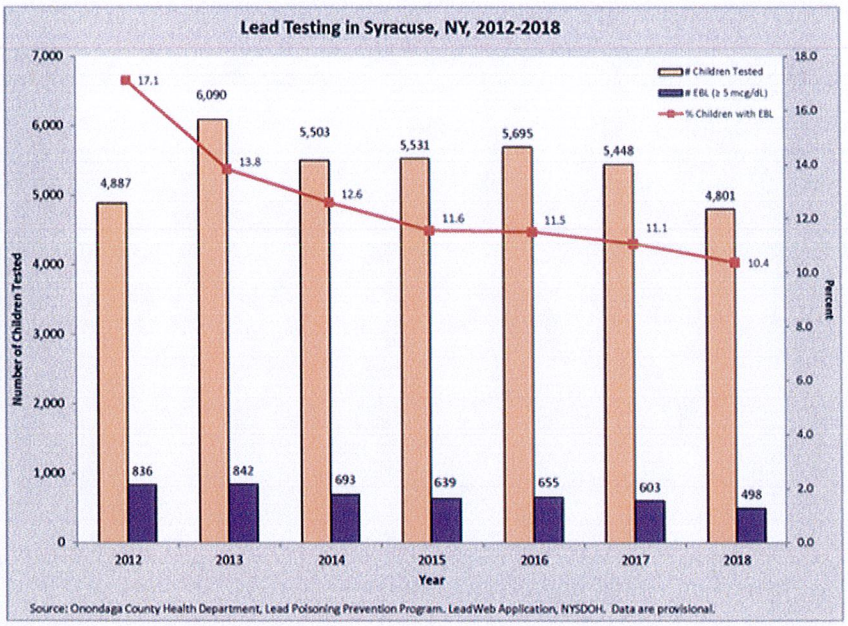
Two, the 2018 Syracuse testing results (498 children in Syracuse) are historic lows (yet, still extremely high in terms of the lives affected). The explanation for the reduction is unclear, except that fewer children were reported tested in 2018 than in 2017 (10,999 in 2018 vs. 11,746 in 2017).

Our Recommendation: The number should not be used without further context. For example, with fewer children tested (many of who may have been poisoned), the actual number of lead poisoned children in 2018 may have been as high as in 2017.

Additionally, this single number fails to account for the long-term harm to community residents for prior years of higher numbers of children identified with lead poisoning. Citing this single number for a single year fails to quantitatively illustrate the struggle Syracuse has had with lead poisoning. Meanwhile, the full picture is important to have when arguing for the necessity of a strong lead ordinance.

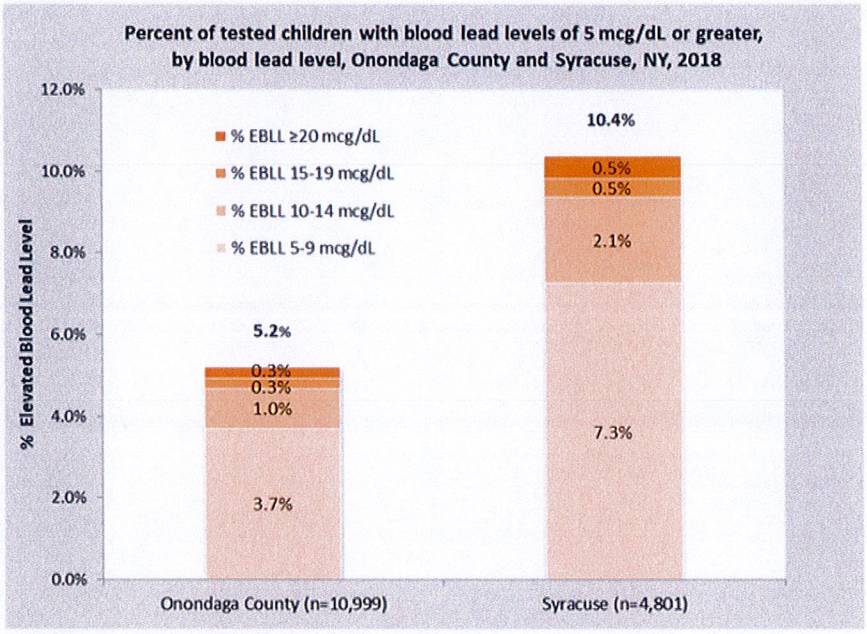
Finally, any change in the number should have a corresponding change in the estimated percentage of children under 6 tested in Syracuse who have an elevated blood lead level. The cited figure of 10.7% appears to be inconsistent with the longer-term trend of lead poisoning faced by Syracuse families.

Paragraph one of the EXECUTIVE SUMMARY should provide a more historically accurate quantitative figure, or set of figures.



498

2018



Source: Onondaga County Health Department, Lead Poisoning Prevention Program
2018 data are considered preliminary.

Lead Poisoning Prevention Program

J. Ryan McMahon II, County Executive
Indu Gupta, MD, MPH, Commissioner of Health

ongov.net

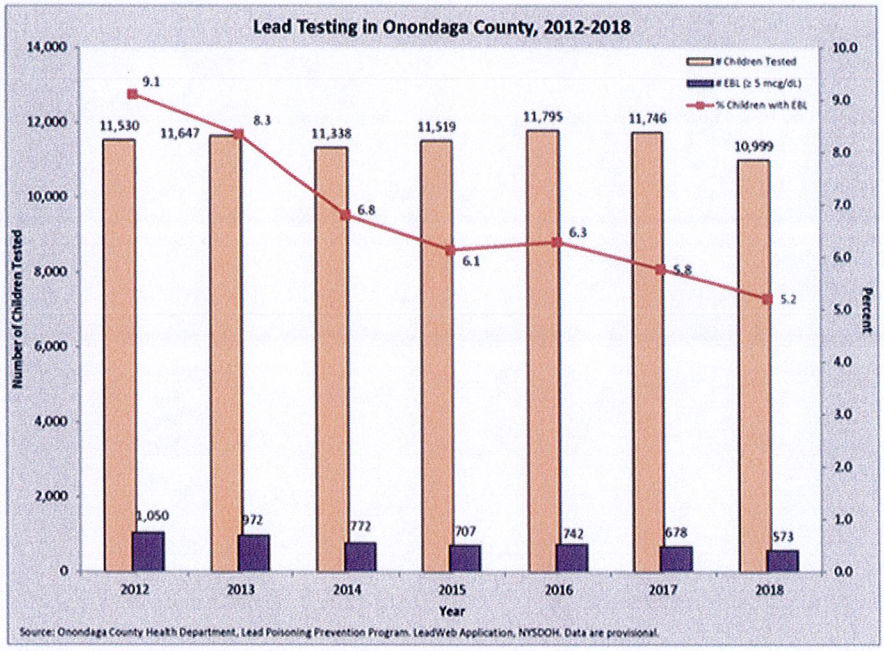
Lead Poisoning Prevention Data

Protecting children from lead is important for their lifelong good health. Even low levels of blood lead have been shown to affect children's physical and cognitive development. Fortunately, lead poisoning is entirely preventable.

New York State requires doctors to test all children for lead poisoning at ages 1 and 2. Only a blood test can tell how much lead is in a child's body. The Centers for Disease Control and Prevention determines what follow-up is needed for a child based on the amount of lead found in a child's blood.

In addition to testing at age 1 and 2, the child's health care provider must complete a lead risk assessment at each well-child visit from birth to age 6 years old and may order additional testing based on the results of that assessment. New York State also requires that all newly arrived refugee children between the ages of 6 months and 16 years be tested upon arrival and 3-6 months after they arrive.

Results shared on this page represent only children tested for lead. Additional information on our programs and services may be found in the Onondaga County Health Department Annual Report and elsewhere on the program's website.



Onondaga County Health Dept
Lead Poisoning Prevention Program
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LeadFree KIDS for a Healthy Future

Comment 4

Alternative 1: Choosing the Preferred Alternative

Alternative 1 would include dust wipe sampling and the designation of "high risk areas." Dust from lead paint is a major contributor to lead poisoning and should be included in any lead ordinance.

As the DGEIS states, on page 37:

"Under Alternative 1, lead wipe sampling will occur in those areas defined as "high risk". Lead dust wipe sampling is a more comprehensive inspection as compared to visual inspection alone. Dust wipe sampling can identify small particles of lead contaminated dust not visible to the naked eye. A person with normal eyesight cannot detect individual dust particles smaller than 50 micrometers (µm) in diameter.[56] Data indicate that a significant percentage of the dust generated during lead hazard control work is smaller than 50 µm.[57] Clearance using dust wipes provides a more definitive conclusion that the hazard has been removed, and therefore Alternative 1 provides a more comprehensive plan for reducing lead exposure as compared to Alternative 2."

Our Recommendation: Common Councilors who are serious about addressing childhood lead poisoning in rental housing should approve Alternative 1, which is feasible, cost-effective, environmentally sustainable, and best for the health of Syracuse families.

Comment 5

We are concerned that data about lead hazards identified, reduced, and controlled with HUD funding, and information about Certificate of Occupancy compliance, will not be accessible unless it is placed on a digital platform.

DGEIS Section 3.3.2.1 "Property Transfer and Notification" (pp., 43-44), which is written into section 54-15 of the proposed lead ordinance, states the following: "*Lastly, the City will maintain a database, accessible to the public, of all residential properties where lead hazards have been identified, reduced and controlled with funds received by the City from the United States Department of Housing and Urban Development. The City shall further maintain a database of all residential properties granted a certificate of occupancy. These databases will be available to "walk-in" inspection by the public. Freedom of Information request will not be required to review this database.*"

It is unclear as to why, when affordable digital options would seem to be available to the City of Syracuse, that these two important databases (HUD remediated homes, and Certificate of Occupancy compliance) are available only for walk-in inspection. While laudable that this data shall be made available to anyone who walks in, the fact that access is restricted to business hours, and in a single location downtown, would likely make the databases unavailable to most parents.

Our Recommendation: In addition to a walk-in database, the information be made available through a digital portal which is accessible through the internet.

Comment 6

Section 54-13 (B) "Prohibition of Retaliatory Action" is inconsistent with the Tenant Protection Act of 2019.

We are very concerned about the shortcomings of Section 54-13, which makes a claim to protecting our fellow Syracuse residents from retaliation by landlords for seeking protecting from unhealthy lead hazards. We have two concerns here.

The first is related to the rebuttable presumption. Section 54-13 (B), as written, does not correspond to current New York State law, specifically the Tenant Protection Act of 2019.

Our recommendation: That this paragraph be re-written to align with the current law of the State of New York, specifically Section 223-B of the NYS Real Property Law. In other words, in section 54-13 (B), the text should change the time period for the rebuttable presumption from six months **one year** (see: https://www.nysenate.gov/legislation/laws/RPP/223-B).

The second is related to the very real matter of too-frequent breaches of the warranty of habitability in Syracuse by landlords. As many policymakers are no doubt aware of, due to the deteriorated condition of many Syracuse rental units, there are too many cases of a breach of the warranty of habitability for which tenants often withhold rent to encourage a landlord to make proper repairs.

Our recommendation: Section 54-13 (B) should get rid of the phrase "except that in instances of nonpayment of rent".

Comment 7

Section 54-13 (B), "Prohibition of Retaliatory Action" fails to include additional, but relevant, governmental agencies.

We believe this section could be made stronger to protect tenants from retaliation which could result if they contact either the Onondaga County or the New York State Department of Health in connection with a concern over childhood lead poisoning. For example, as is the case now, families can discover there is a lead hazard in the home they are renting precisely because of an investigation by the Department of Health stemming from a blood lead test.

Our recommendation: Use language that includes communication with all governmental agencies, at every level of government short of the federal level, such as the phrase "any governmental agency (City or County or State)". In other words,

Section 54-13(B): "There shall be a rebuttable presumption that any attempt ... to evict a tenant within **one year** after any report to **any governmental agency (City or County or State)** or the owner or any enforcement action in connection with...."

STATE OF NEW YORK — **CITY OF SYRACUSE**

COUNTY OF ONONDAGA — **SYRACUSE COMMON COUNCIL**

In the Matter of

PROPOSED LEAD ORDINANCE

PUBLIC HEARING in the above matter, conducted at Syracuse City Hall, Common Council Chambers, 233 East Washington Street, Syracuse, New York before JOHN F. DRURY, CSR, Certified Shorthand Reporter and Notary Public in and for the State of New York, on February 12, 2020, 5:30-7:10 pm.

COMMON COUNCIL MEMBERS PRESENT:

PRESIDENT — HELEN HUDSON

PRESIDENT PRO TEM — KHALID BEY
COUNCILOR AT LARGE — TIMOTHY RUDD
COUNCILOR AT LARGE — MICHAEL GREENE
COUNCILOR AT LARGE — RITA M. PANIAGUA
COUNCILOR DISTRICT 2 — PATRICK HOGAN
COUNCILOR DISTRICT 3 — CHOL MAJOK
COUNCILOR DISTRICT 4 — LATOYA ALLEN
COUNCILOR DISTRICT 5 — JOE DRISCOLL

ALSO PRESENT:

BRYAN BAYR, C&S Managing Environmental Scientist

MARY MARGARET O'HARA, Neighborhood Business Devel.

KEN TOWSLEY, Director of Codes

Reported By:
John F. Drury, CSR, RPR
Court Reporter 471-7397

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Driscoll

COUNCILOR DRISCOLL: Good evening everyone. I hope everyone is all right. Thank you for coming out tonight. My name is Joe Driscoll, I'm the 5th District Councilor. With us tonight we have my fellow Councilors: Councilor Hogan, Councilor Majok, Councilor Paniagua, Councilor Greene, President Hudson, President Pro Tem Councilor Bey Councilor Rudd and Councilor Allen.

Also joining us we have Mary Margaret O'Hara from Neighborhood and Business Development, and Bryan Bayer from C&S Engineering, they're the company that has done this Environmental Impact Study, and Ken Towsley, our Director of Codes.

So thank you all again for coming out. And it's great to see the council chambers packed always, I'm a big fan of civic engagement.

So basically I'll give you a brief overview how things are going to roll tonight. We want to inform you guys

Driscoll

about the Environmental Impact Study. So there is two parts. There is the lead Ordinance, which is going to be introduced after this period. We have a thirty day public comment period, where we want to hear from you and the public citizens of Syracuse, get your feedback, thoughts, are you in favor of it? In opposition to it? Ways you think we can improve the legislation.

We'll be taking time for that after the brief presentation tonight to hear from you. And also you can submit your comments in writing to NBD@SYRGOV.NET. You can submit your comments in writing, we'd love to take them, and as we take all these comments in, we're going to take the thirty days, March 5th, the public comment period ends. We take all the public feedback that we've garnered, we look at the legislation and we try to incorporate the input that we've gotten to make the legislation as good as it can be and as strong as it can be and

Driscoll

then we'll introduce it to the Council.

So that's what's going on tonight. We're going to be trying to focus from our perspective mostly on the Environmental Impact Study and what we've learned from that and what has gone on.

So we're going to have about 20, 30 minutes or probably 30, 40 minutes of presentation from you folks, and then we'll begin hearing from the public for the remainder of the evening. We have a sign up list. Anyone still wants to sign up there is Council staff in the back. And we request that you keep come your comments to around two to three minutes. Two minutes says Councilor Bey, so two minutes. I'm happy to second that motion.

So thank you all again for coming out and with that being said, Bryan, are you going to present first? So again, Bryan Bayer with C&S Company with the Environmental Impact Statement. Thank

Bryan Bayer C&S

you for coming.

BRYAN BAYER: Thanks Joe, appreciate being here, thanks very much. Again, my name is Bryan Bayer, C&S Company, and as Joe said, the City has retained C&S to assist in the preparation of the Draft Generic Environmental Impact Statement associated with the proposed Lead Ordinance.

COUNCILOR DRISCOLL: Pull your mic closer, Bryan.

BRYAN BAYER: Little background about myself. I've been working at C&S in the environmental consulting industry for more than twenty years. Most of what I do involves impact analysis and document preparation associated with the New York State Environmental Quality Review Act or SEQRA.

The City, as lead agent for the Draft Generic Environmental Impact Statement has undergone a review per SEQRA. And let me just back up. SEQRA for those of you who don't know, is the

Bryan Bayer C&S

law in New York State which requires local and state agencies to consider environmental impacts associated with actions that they are either going to undertake, fund or approve.

Now the City as lead agent, has decided that the proposed lead Ordinance is the type of action that may result in significant adverse environmental effects. And therefore have undergone the preparation of this Generic Environmental Impact Statement. So what is the DGEIS and what's in ours? So the DGEIS provides an overall assessment of the proposed Lead Ordinance's potential effect on the environment, and it also develops standards and mitigating measures to follow for subsequent actions.

The City of Syracuse is proposing to amend its municipal property conservation code to provide the identification, reduction and controlling of hazards due to the

presence of deteriorated lead-based paint in and on pre-1978 structures. The Ordinance will require the presence of the deteriorated lead-based paint be identified and correctly addressed.

The project purpose need and benefits. The need for a lead Ordinance is based on the significant impact that lead exposure has on its residents, especially children. Onondaga County is one of 15 counties meeting the New York State Department of Health's criteria to be identified as a community of concern, with the city of Syracuse containing five high risk targeted risk codes, serving as the basis for its designation.

New York State's policy framework for primary prevention to address lead hazards in housing before children are affected provides limited financial resources. The City of Syracuse's proposed Ordinance defines methods to control lead hazards before exposure

occurs.

So health effect of lead. What did we know about lead? Lead enters the body through inhalation, absorption or ingestion. It's absorbed by bones, blood and tissue, and this leads to continuous contamination exposure.

Both short term and long term effects of lead are known. Short term effects are those that generally result from high exposure, high levels of exposure in a short period of time. Symptoms include fatigue, headaches, memory loss and tiredness. More severe symptoms include anemia, kidney and brain damage.

Now, long term effects, these are those that result from low exposure over a longer period of time. It can result in nausea, depression, abdominal pain. More severe symptoms can include high blood pressure, heart and kidney disease and reduced fertility.

Children under the age of six years

old absorb lead four to five times faster than adults, leading to magnification of contamination effects. Cognitive development may be inhibited, leading to lifelong harm. Can include altered neuromotor and neurosensory function, hearing loss, learning and behavioral abnormalities. Physical damages also can occur, including seizures, comas and immunotoxicity. Damages from lead poisoning in childhood are often irreversible.

So the Proposed Action. The lead Ordinance will authorize inspection by City of Syracuse personnel associated with Rental Registry and Certificate of Compliance. Housing units will be exempt if they are already required to be safe from lead paint hazards under federal law, or an EPA certified risk assessor deems the unit has no lead-based paint.

Building owners are required to obtain a Rental Registry Certificate for

each one and/or two family owner occupied dwelling, rented or leased within the City. A lead visual assessment is completed as part of the inspection process.

Rental Registry Certificates expire every three years, and a lead visual assessment will be completed for each renewal. The City also issues Certificates of Compliance for three, four and five family rental properties. A lead visual assessment will be connected to issuance of Certificate of Compliance, and these are also renewed on a three year period.

A visual inspection will also occur as a result of a filing of a complaint. So what does a visual assessment include? Well, it includes a review of deteriorated paint, both interior and exterior, and it also involves a review to determine whether or not bare soil occurs within the drip line of structures.

Bryan Bayer C&S

Within the Draft Generic Environmental Impact statement or DGEIS, there are two alternatives that are described.

Alternative 1. This involves the identification of a high risk area. High risk areas will be subject to additional inspection and clearance requirements, as compared to areas outside the designated area. High risk areas will be based on a number of factors, including but not limited to, County Health Department inspections, and elevated blood lead levels observed during New York State mandated testing.

Alternative 2. This alternative includes designation of a high risk area and subsequent dust-wipe sample clearance protocols.

Within the alternative analysis in the documents, Alternative 1 has been selected as the preferred alternative.

So the High Risk Areas. The City has defined within the document high

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risk areas as those census tracts that fall within the neighborhood revitalization strategy areas or NRSA. The NRSA aligns with areas in which high rates of childhood elevated blood lead levels have occurred.

The United States Department of Housing and Urban Development have approved the NRSA. And this area was selected as it results or as it meets or exceeds the following four criteria:

At least 50 percent of housing was built prior to 1978. At least 50 percent of households reside in rental properties. A significant amount of residents are living in poverty. And at least 50 percent of the area is comprised of residents considered to be minority population.

So this slide is going to give you an overview of those structures that will be listed in the Rental Registry or that will require a Certificate of Compliance. And you can see the total

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number of structures that are built prior to 1978 and built after. It also provides information with respect to total structures in the NRSA.

So as previously stated, this document is a Draft Generic Environmental Impact Statement. We are currently in the public comment period. We have issued this document to the public for comment and input. We have also provided this document to other state and local involved or interested agencies.

The public comment period began February 5th and will end on March 5th of 2020. A copy of the document is provided to the City of Syracuse Neighborhood and Business Development website, a link is shown in the slide there. And the public can submit comments regarding the DGEIS to the Department of Neighborhood and Business Development address provided. Comments may be delivered in person, mailed or

Q&A of Bayer by Councilors

submitted by e-mail to NBD@SYR.NET.

All set, thank you. That concludes my presentation.

COUNCILOR DRISCOLL: At this time I would like to offer the opportunity for any Councilors to ask any questions about the presentation, but I would note, Council, that we will have separate meetings regarding the Ordinance itself. The questions now, we would keep them restricted to the results of the Environmental Impact Study. Councilor Hogan? Majok? Paniagua? Greene?

BY COUNCILOR GREENE:

Q. The area chosen in the NRSA, do we know what percentages of cases typically come from that area?

A. (Bayer) I do not have that data on hand. I can certainly provide you with that information. I don't have it on hand right now.

COUNCILOR DRISCOLL: I call my experts from the audience. Deb? Stephanie? No?

Lewis Ond Cnty

COURT REPORTER: Give me your name first.

COUNCILOR DRISCOLL: Sorry, just so everyone knows, I warned Deb beforehand this is probably going to happen.

DEBRA LEWIS: I'm Debra Lewis, I'm the Program Coordinator for the Onondaga County Health Department Lead Poisoning Prevention Program. The NRSA areas and the areas identified as area of high risk for potential for lead poisoning in Syracuse and Onondaga County have a very close alignment.

The percentages, I don't know that specifically, but when we look at GIS mapping and we layered those two things together they are identical areas of the City and are also associated with other indicators of social determinants of health, poverty, a higher percentage of rental property, higher percentage of households receiving social security benefits, and other indicators that indicate that housing and the needs of

MM O'Hara NBD

the family are going to be increased for our community.

COUNCILOR DRISCOLL: Does that answer your question?

COUNCILOR GREENE: Yes.

COUNCILOR DRISCOLL: Mr. Bey? Questions? No. Okay, thank you, Bryan for your presentation. Mary Margaret, would you like to say a little bit? So Mary Margaret is here on behalf of the Neighborhood and Business Development Chapter of the City. And she's been heading up a lot of the lead program thus far. So she has a brief presentation on what the City lead program looks like thus far.

MARY MARGARET O'HARA: Thank you, Councilor Driscoll, thank you, Bryan. So, some background. The City received funding from the Housing and Urban Development. The HUD Department for eligible units to receive funding to make houses safer from lead hazards.

So I'm going to go through a little

MM O'Hara NBD

bit on what the funding is and what qualifies a unit to receive the funding.

So the City was awarded 3.5 million. That was a full amount in this grant funding cycle to address lead-based paint hazards. And 600,000 in healthy homes assessment, which is for non-lead based paint hazards, could include improvements for mold, trip and fall hazards, and other home health hazards.

The grant period began in April. And we will be finishing up before October of 2022. In order for a unit to qualify. First, we can only work in units between zero to 4. It has to be built before 1978. And a child under the age of 6 needs to reside in the property or visit and spend a significant amount of time there. And significant is defined as at least two days a week, relatively worked out to about 60 hours a year. For the owner to be eligible, so that's the first step, the unit needs to be eligible.

MM O'Hara NBD

Next, the owner needs to supply the deed, a copy of the current homeowner's insurance policy declaration page, proof that the mortgage is current and finally, fill out their part of the application.

The resident needs to bring income documentation, which includes all sources of income. So it could be anything from a COLA letter to employment, pension, retirement, any public assistance rental income, etc.

So a lot of that is, the financial portion that the resident needs to bring, and it's important to distinguish that the homeowner doesn't need to bring any kind of financial documentation, all of that is just for residents eligibility. For all residents over the age of 18, unless they're a full time student.

We also do need a blood level test for any child under the age of six that actually lived there. If not lived there and just visiting then we do not

need the blood test.

We coordinate with the County Health Department. They receive part of our grant to administer a portion, which also not only helps us to identify areas where children are at risk. So if the Health Department receives information on a child's elevated blood lead levels, they are put into our GIS database which is the database the Code uses to track property with code violations. At that point our office sent out a letter to the unit encouraging them to apply for the program.

Once an application is received and approved and all the documentation, the residents receive notification and a Lead Inspection Risk Assessment is performed, with an XRF machine, which is able to identify lead hazards on all paint surfaces.

At that point the risk assessment report will recommend either, you know, depending on the level of lead found and

the components that it was found on, whether it needs to be cleaned, replaced, fixed, repaired, painted. All of that is based on a scientific study.

So the last part is actually performing the work the at the unit. And all of the areas that are painted where lead hazards have been identified, whether it be the interior or the exterior of the property. Which can include doors, floors, porches, windows, those are the most common areas.

The Health Department also does outreach to the residents to provide education and safety on how to safely protect themselves during, before the preparation, where the work is being prepared, during, and then after on how to safely clean and protect themselves and their belongings and their family.

So if you like to apply to the program, we do have applications on the back table tonight. There is also some fliers out. And you can go to the City

website, www.syrgov.net/lead. You can call the Lead Program line, which is (315) 448-8710. You can ask for an application be sent to your residence. You can e-mail, and you can also pick up an application at the Department of Neighborhood and Business Development, which is next door at City Hall Commons on the 6th floor.

COUNCILOR DRISCOLL: Is that the end of your presentation?

MARY MARGARET O'HARA: Yes, thank you.

COUNCILOR DRISCOLL: Open up to the fellow Councilors. Does anyone have questions?

QUESTIONING BY COUNCILOR HOGAN:

Q. I was just wondering as to what is reaching out? Is reaching out door to door?

A. The Health Department, their outreach is for the units that have been approved. And where the lead inspections have been performed and we're awaiting for the contractors to go in to do -- they'll be disturbing a lot of dust and paint at the property. So the health educators come before

that happens to help the family protect themselves and their belongings. So whether it's putting a covering with plastic couches and mattresses in certain areas and enclosing rooms that are being worked on, you know, safety measures that need to be taken while the work is being performed.

Q. I guess my concern is how we let people know, the neighborhood know about the programs, folks that don't have computers, things like that?

A. About the lead program?

Q. Yes.

A. So we do do a lot of public meetings. We've done an outreach for the TNT for the past 12 months. And that that community is, a lot of it is word of mouth, neighbor to neighbor. A lot of the folks that are being affected are the rental community, so they don't always attend some of the neighborhood meetings, which is a tough call. And you know, sometimes we get them, unfortunately when the children have already been affected when we're notified over a high lead blood level.

COUNCILOR DRISCOLL: Deb, if you would look to say something? Would you come back up to the mic. And Councilor

also mention we've been speaking with SU about incorporating a few students to help getting the word out in the neighborhood, doing outreach to both property owners, landlords and tenants too who face the problem as well. So that's one aspect we're working on.

DEBRA LEWIS: The Onondaga County Health Department Lead Poisoning Prevention Program scope of services includes proactive promotion of the program, to include social media, marketing, development of materials, distribution of materials, information on the grand scale and every notice of demand sent out by our office for all of our inspected units.

What Mary Margaret referred to inspection information being entered into the City's code database, GIS, there is a mechanism within that for the Health Department to make a directed referral to the Lead Program based on the condition of the property and the

owner's interest or need for the grant program.

QUESTIONS OF O'HARA BY COUNCILOR PANIAGU:

Q. Do you make an appointment to go visit a unit?

A. (Lewis) If the services are required that's a part of our required service to the community is to make sure that accommodation is provided.

A. (O'Hara) I'm also a Spanish speaker, so when we receive phone calls I'm able to help people with the application.

COUNCILOR DRISCOLL: Anyone else? Questions?

BY COUNCILOR PANIAGUA:

Q. I have one more question. From what you told me your obligation, how long is the process to get approved?

A. (O'Hara) Well, the most important thing is getting all the documentation in. And it is quite cumbersome. Because the income documentation, people don't realize that it requires all sources of income. Sometimes people have their pay stubs, but then they also have

maybe, you know, pension income or Social Security income. We have to make sure that everything is brought.

The next is that the blood tests have to be current, and so the requirements are quite steep. So I would say if we have all the documentation in on an application we then are able to approve it and the County lead inspectors within about one month at least, usually it's a lot less, between two weeks to a month, will have contacted the residents and the owner to make an appointment to view the inspection.

Next we have to have the XRF machine inspection as well. That's very shortly after, usually within days. It actually can be before or after the inspection. Then a risk assessment report is prepared and at that point the County has a list of 16 EPA approved contractors that have to meet to bid on the contract. And then they have two weeks after that to start work.

So, you know, if you have an approved application it may take two months or, you know, depending over the backlog of them to actually hammer some nails and get to start work.

COUNCILOR DRISCOLL: Just one point I would like to make quickly, is that the burden of information is quite heavy but all that is federally regulated. As far as the amount of pay stubs -- and we've had some push back from people saying there is a lot of paperwork required, but that's from the federally mandated, we have to.

BY COUNCILOR RUDD:

Q. Question. You're saying all the residents requirements are federally mandated?

A. Yes, we tried to take away some burdens. So in consideration of the Lead Program, for example, we took away, there needs to be a lien based on the property once work is performed, five year, you know, decreasing lien. But also the requirements listed in here are federally required.

Q. Push back, how do you push back? Are there other ways? Because in this particular, I don't believe the recipient of the County lead program, and I do think the resident eligibility requirements are probably the biggest.

A. This is not County money, this is City

money.

Q. City and HUD's money?

A. Right.

Q. We worked hard getting the area where there is high problems, you're saying you confirmed that this house is in the neighborhood that's got high poverty and there are kids in the house and lead hazards, and you're going to force those people to go get proof of income, proof of assets and all of those other things in order to get into the property that they don't own?

A. Right.

Q. Is that fair?

A. To clarify, it's not exclusive only to the NRSA, so it's to the whole City, as long as they meet the eligibility requirements. Yes, if the tenant, regardless if they live in the NRSA or not.

Q. Would it be possible to remove the eligibility of the residents, some of these resident eligibility requirements within the NRSA?

A. I wish we could, but this is a HUD required. Because it's income based for the tenant. They have to, they can't make more than

80 percent of the area median income. So that's why they need all sources.

Q. I ask you to push back and ask them within the area, we're making a lead law primarily to apply to the area, the lead law is going to overlap with the poverty levels that go with this neighborhood. Why wouldn't you just want to fix the unit, because someone else is going to move in there when these people move?

A. I think that's a really great point. Because I essentially, this is about not only helping children to not get lead poisoned but also creating safe and healthy housing, because there is turnover, and a lot of turnover in certain areas.

The one thing having to provide all sources of income assured is that we are targeting units where the residents make no more than 80 percent of the area median income.

BY COUNCILOR BEY:

Q. Just a point of clarification. It's a lot of information, I think this is probably good for the public as well. There appears to be, I put quotes on "appears," conflicting at least on

the surface seems to be conflicting statements, right.

Under Section 1.1, Purpose and Need and Benefit, New York State policy framework for primary prevention rate of lead exposure -- excuse me, New York policy framework for primary prevention to address lead hazards in the house before affected, provide financial resources.

Obviously a point of concern just in general, I mention that because obviously, and another part of this it talks about prevention as a goal. But I want to make sure I'm not reading anything wrong. When I look at units with County Health Department lead violation, what the terms are, the County has first determined there is a kid infected for lead poison before they receive?

A. No, that's just one of our strategies for targeting, helping to reach where we have. In the presentation it just shows a partnership we have with the Health Department. They provide us also referrals for units where a child has an elevated blood lead level so that we can try to address that.

Q. So we're only talking about how the

designation was acquired, when you're talking about it. Because on the surface --

COUNCILOR DRISCOLL: It was kind of worded like it was a prerequisite.

COUNCILOR BEY: Right.

Q. Like the kid was infected. So we need to make sure that's clear?

A. No, this is not at all a requirement.

COUNCILOR DRISCOLL: Yes, it reads that way.

A. The presentation, the application in the back like I said, I can send you a copy, makes it pretty clear that's not a requirement. Even we require for resident children under the age to have a blood level test, if the blood lead level test comes back less than 2, which is potentially possible zero, that doesn't prevent us from working in that unit.

BY COUNCILOR RUDD:

Q. Why would you do it then?

A. Because to your point earlier, there may be turnover in the future where there could be another child exposed. Children are only exposed at their places of residence.

Q. Why would you require a blood lead level test if a low lead level is an exclusion from the program?

A. It's a HUD requirement, I believe it may have something to do with tracking data based on, you know, how many units have we actually gone into where children have been affected.

COUNCILOR RUDD: I think we should put that as a barrier because if it's not a requirement then it's a barrier, and we don't spend all our money.

COUNCILOR DRISCOLL: Deb, you have had one?

DEBRA LEWIS: If I can clarify two points. The blood, requirement for blood lead testing has two purposes. It require proof of testing before and after the work is completed, to make sure that the children are not inadvertently exposed during the renovation process. So that's really important, because improper work practices are the saddest type of exposure for children in our community.

Somebody doing work and exposes the child, in the effort to make it safer, that's completely preventible. And so that's kind of a check on the system to make sure the contractors are doing the right thing the right way. And it is a federal requirement and been a HUD regulation for a very long time.

BY COUNCILOR RUDD:

Q. If that's so, let's just prevent that that happens. Isn't it very unlikely that anything would happen to that contractor, because the child could have been exposed in any other number of or environments where the child goes?

A. (Lewis) I can't speak to the regulatory, that's really outside of HUD and EPA has regulatory authority over what happens to the contractor that doesn't follow proper procedures. And there are sanctions that can be incredibly costly to that contractor.

And as far as prevention goes, New York State Primary Prevention Grant Program identifies 15 communities of concern. So where you see the language in the beginning that talks about the 13

counties of primary prevention designation, that's a New York State Department of Health designation. That provides grant funding to 15 counties in New York State.

And the funding for primary prevention in each of the counties are used for a couple of things. To identify units before children are impacted, form partnership to initiate a primary prevention approach to the community. And a whole list of other things, develop a lead safe workforce. And then promote strategies that are effective at preventing childhood lead poisoning, such as ordinances at the local level, such as partnerships and referrals, to make sure that properties are maintained and kept safe and healthy for all resident in the community.

COUNCILOR DRISCOLL: Thank you, Deb. And if my fellow Councilors don't have any objection, like to have Councilor Majok address his questions. Anybody else have any questions after that? Counselor Majok first and then Councilor Allen.

QUESTIONS BY COUNCILOR MAJOK:

Q. Mary Margaret, I know that in the time that has passed, you have tried to make an effort to go out there and present and do good things. Now my question is more of a logistics question. That is a little bit of what Councilor Paniagua talked about earlier.

If you got to those that have very limited access to information, such as the neo American community, are we very intentional in terms of not just making presentation to the community but being very intentional as to who are the audience? Such as the neo American community, usually don't go into public meetings and seniors who are not able to make it out. Are those things on how we make sure that they have access to that?

A. (O'Hara) Thank you very much for that. We aren't as equipped for, to be as intentional as we would like to be. We do have the support of the Health Department going in and their activities going out in the communities.

But it is true, we really could use material in several different languages, not only application, but on our website. And that's the area that the program could really improve on. So

I really appreciate your concern.

COUNCILOR DRISCOLL: And if I could follow-up Councilor Majok. I think the hope is, as we start the enforcement and inspection, we'll start to see more people not perhaps as proactive in the past will become more proactive as we're checking, would be our aspiration. Councilor Allen, you had one?

COUNCILOR ALLEN: Yes, two questions.

BY COUNCILOR ALLEN:

Q. You guys had a number to date how many families you helped since April of 2019?

A. (O'Hara) So we have 65 cases assigned currently and about, there is several others that are. Assigned means they have the inspection date and either have the inspection done already. But there are several others that are coming on line also to go into that. We're about 76.

Q. So assuming that the numbers might be different, do you know how many actually applied?

A. Yes. So the actual applications, we have several in process that we do a lot of outreach to try to get material from, and

unfortunately there is about 70 who we haven't been able to move forward yet.

Q. And so not move forward, meaning you guys don't have the capacity or because they don't meet the eligibility requirements?

A. It is a capacity issue as well as sometimes what happens is that we'll get many pieces of the application, but perhaps the homeowner's insurance is expired. And we contact the owner and the owner just, you know, doesn't get back to us or perhaps the resident has left that unit already. And so that would be an application that had been started and in progress that now has stopped.

Q. So for the ones that won't meet the requirements, do you guys offer any other resources or do you kind of steer them in another direction? How does that work if you don't meet the requirement?

A. Yes, so Home Headquarters has a great windows and doors program thanks to the Community Foundation funding. So if they don't meet the requirements, sometimes because they don't have a child under the age of 6 who resides there or

visits there. So, you know, we do let them know about other sources of funding in the community.

COUNCILOR DRISCOLL: President Hudson?

BY PRESIDENT HUDSON:

Q. Yes, I want to try to wrap my head around this. So what I'm hearing you say is that the owner and the tenant are moved together in this process, right? So if there is lead involved and the tenant is being affected, but the homeowner doesn't have the paperwork, the tenant still has to produce it also?

A. Yes, that's correct.

Q. So that's one. So what I want to know is the timeline. So once the work is approved, it's started, what's the timeline for the work to be done, approved and done?

A. Well, it's a little bit early to --

Q. It's not the application process, I'm talking about the work.

A. I tried to include the work getting started process in that. So if we have an approved application it needs to be set up with the inspector. And between the inspector, and the tenant needs to be present to allow the inspector

to come in. So they choose the date, usually it's about two weeks out.

After that there is a few days later usually there is the SRS ecospect inspection, they're part of the inspection, the risk assessment report, which includes the recommendations of what type of work to address the identified lead hazard needs to be done at the property. And at that point there is a bidding process that takes two weeks as well. And then there is, you know, of course the contractors have to go through their set up for the job, purchase materials and to make sure that they're ready to go on board. So it's about a two month process before work starts.

Q. So next question I have is going to be pigging back off Councilor Hogan. You talked about preparing the people, getting the cover over the furniture. So what happens to the people? Are they stuck in there? Do we not have the mechanism to move them out of the way so they're not in the house?

A. So we do have relocation. There is a part of the grant that we set aside when it is

necessary to relocate. Relocation is a last resort option because, you know, there is children at the property usually living there, and to disturb their daily routine, whether it be school or other, you know, not always the best option. So we really rely heavily on our sub grantee, the Health Department, with their relocation process, in determining whether this is a case that needs relocation or does not need relocation.

Q. How many relocations do you have so far?

A. **So far we've had zero.**

COUNCILOR DRISCOLL: One more, I believe Councilor Majok, so we can move on. I definitely want to give the public a chance to give some input before it goes on too long.

BY COUNCILOR MAJOK:

Q. I have a question that is somewhat two part and one is really to you. Considering that part of making this process effective is having the code enforcement, right? Now with this coming on, does that mean that we are going to specifically designate code enforcement folks specifically for this?

Or is it just going to be a part of a normal process? Because we did say about how this process is going to be prolonged in a sense. Do you have what I'm asking about?

A. **(Towsley) Yes, Councilor, this will be part of the normal inspection process, we go in and inspect a leaking faucet or no smoke detecter or etc. Part of that process when we're in there will be testing for lead.**

Q. Now, part of what the City has been struggling with for a long time is not having enough code enforcement, right? Did I get that right? We don't have enough, right?

A. **(Towsley) Correct.**

Q. If you add this on top of that, not having enough already, is there a part on your part Mary Margaret, where we have some funding where we bring on more code enforcement or how dough we do this?

A. **(O'Hara) So the way that this grant, this is a 42 month grant, and the way that it was written and devised is that we're not relying on City code inspectors to do the inspection. Where the HUD grant money is going, we sub-granted out**

that work to the County Community Development Division. And their codes inspectors are the inspectors for the HUD grant and the eligible units.

Ken's department and the codes referrals, once they find lead in a unit, under the Ordinance, if that comes on line, they will be able to identify with greater speed and frequency a unit that has a lead hazard. And they can make referrals to get the unit some, if they're eligible, some funding to address those lead hazards.

But the codes inspectors are completely separate on this grant. If in the future the City decides to reapply to HUD funding for another grant cycle, that could be an area that could be talked about using City codes inspectors or perhaps expanding the program to being perhaps, you know, an efficient way within the lead and codes side.

Q. So are we pretty much confident that considering these code enforcement, whether going to be coming from the County that we are going to get what we need as we know that lead is the

problem. Are we going to get what we need?

A. **Yes, fortunately we work very well with the County Community Development Division. They have eight inspectors on staff dedicated to the lead grant. And also they run simultaneously the same lead grant program. And these inspectors are used for the City lead grant and the County lead grant.**

COUNCILOR DRISCOLL: If we could keep them Councilor Hogan and Councilor Bey. One last quick one, because we are definitely over our time for the Council portion.

BY COUNCILOR HOGAN:

Q. I was just wondering if any kind of collaborative effort between the County Health Department and School District. I know Mary Margaret's mother Ann was at one time a school nurse, and the kids develop problems with lead symptoms. I'm just wondering if there is any way to trace it back. I worry about identifying all the houses that might be, you know, have this problem, so.

A. **(Lewis) Couple of things. Yes, the**

Health Department collaboration with a number of different partners. We're frequently interacting with schools, medical providers, agencies, Code Enforcement officers, risk assessors from the County Community Development Division and other folks in this room. This is a service of Central New York.

So yes, we do collaborate with the school districts. The schools also have school based health clinics, and in some cases where we have difficulties with a child accessing health care through their primary care provider, we're able to coordinate and connect the dots so that the family gets a test done at the school.

I think your question sounds like it's going toward if a child is showing that they have a negative impact from early exposure to lead what are we doing in the school district?

Q. Well, sort of where it came from. Is there any way of finding, I mean if the kid comes from a house that's contaminated with lead, does that somehow go into this effort?

A. (Lewis) One of the things that school nurses have available to them is access to the New

York State Department of Health Immunization Registry. And so they can see whether a child has had a previous lead test. They can also see whether that test has been elevated and requires follow-up services. So in that way they can kind of get a sense of whether or not the child might need some evaluation, if they're showing some difficulties in behavior or in learning at school.

This is a law that was passed a couple years ago and the state Health Department granted access to school nurses to look that information up. Essentially when a child is in school and struggling, the process for evaluating that student's needs is the same as it is for any other child. And part of the investigation and the inquiry into what's going on is to look at the child's health history.

So we hear from school districts all the time to look for the information. And often, yes, we have entered the house before. Would we then go back to the house and inspect? It depend on the child health result at the time.

Q. You, address that with us somehow, so we know that that is being inspected. Is there some

sort of way you can do that?

A. There is an existing way to do that. One thing I want to clarify, inspectors are different. And we're talking about inspectors kind of in a lump. Relocation is also different and we're talking about that kind of in a lump. The Health Department inspectors are EPA risk assessors. So are the grant inspectors EPA risk assessors. They do look at lead differently.

The Health Department is looking for intact versus non-intact paint. And risk assessors look at the paint and look at every painted surface. So what we look at is different and for different reasons, because of what regulations we're working under.

When the Health Department identifies a property that has lead based paint, one of the things that we're doing in the new partnership with the City is entering that inspection information into the City's code database. They know when we go in and do an inspection. The information is there. And if there is a case in the home where the family is struggling to make repairs, there might be other things happening in

the house, like codes enforcement issues, which is often the case. We'll make a direct referral to Ken and his team for a joint code inspection or to Mary Margaret to sent out and initiate a lead application if the family is interested.

COUNCILOR DRISCOLL: So one last question from Councilor Bey and then we'll open it up to the public. And a reminder to fellow Councilors, and everyone in the chamber, this is definitely the first meeting about lead. We will have another meeting later on to discuss the Ordinance itself. We'll take all your feedback and incorporate it into the legislation to the best of our ability. Councilor Bey?

COUNCILOR BEY: Sorry, Councilor Driscoll, you took longer than I will. I don't know if the answer can be provided here. I was looking at the summary of potential impacts and the summary of mitigation measures relative to historical protective site. This is for, I'll go back 10 years Ashley Arms

on South Salina Street owned by Southeast Gateway, had lead paint on the outside.

They were required to paint it. They were obligated to find the color which nobody made anymore. The time it took for them to find the paint, the cost it took them to actually get that made, probably irritating to most developers.

So I'm just wondering, because it says relative to historical or loss of resource impacts. But it doesn't mention paint color. I don't know if the rules changed. Maybe that's something we can look into and get a response, just for the sake of information.

BRYAN BAYER: The preservation office is an interested agency, with respect to the Environmental Impact Statement. And so they are reviewing this document and so we'll see what kind of feedback we get from them. But as it

stands right now the document suggests that, you know, impact historic resources will be dealt with as part of the typical zoning permitting and so forth done by the City.

COUNCILOR RUDD: I have one really quick comment. I do believe the eligibility requirements on the residents are out of hand. Just for one, like federal government allowing a similar situation. If you're in a school that's got a high rate of poverty, and you cross a certain threshold, they stop asking, because there is a history pretty much, and then make the whole school eligible for free lunch. It's much easier.

That's the way the neighborhood thing should be. If you're in the neighborhood zone where you have all this data you're highly at risk we should make it easier because the barriers right now make it seem more like people want to say they have money

for it without spending any money on it instead of actually spending the money. If you if we make it easier for people to get through, then we can prioritize the people with the most need. And that's easier than having a barrier that prevents us from spending all our money every year.

MARY MARGARET O'HARA: That's a great point. Perhaps you could help me Draft that letter and present that to HUD.

COUNCILOR RUDD: All right.

COUNCILOR DRISCOLL: Resolution to HUD would be great. All right, I don't want to cut any Councilors off, but if there is no --

BY PRESIDENT HUDSON:

Q. We know a lot. A lot of the buildings we have in our City are old. A lot of the different tracts that you're talking about they're old, okay. So when we talk about, and I just want to clear this up in my head, if I don't ask it I'll forget.

So we're saying that the lead is coming from housing that we identified, okay. Could the lead be coming from a school, do we know that?

A. (O'Hara) That's the million dollar question. Perhaps the child is infected at a daycare or an aunt's house or we don't know.

COUNCILOR DRISCOLL: And that remains a challenge. Deputy Mayor Owens.

DEPUTY MAYOR OWENS: Just when Ben Carson was in town, so this is a federal statute. So when he was in town, both Stephanie and the Mayor said directly to him, to the point that you're making about how burdensome it is for us to be able to get this money to the people that need it.

So I mean seriously, Mary Margaret suggested it, this is a federal statute. We want to be in line with the federal requirements because we lost the grant before and then we got it back. So we want to be in line with those, but I think these are points that can be made as a community to HUD through our

Lewis

Congressional advocate or Congressional appointees. But we made that point directly to Ben Carson himself. And I think we need to continue to double down on that to the Councilor's point.

COUNCILOR DRISCOLL: Thank you, Deputy Mayor. If there is no further burning questions, Councilors, all right. Thank you to our presenters. Thank you Bryan and Mary Margaret.

DEBRA LEWIS: Can I clarify your school question?

RICH PUCHALSKI: Let the public speak.

DEBRA LEWIS: I'm almost done. The lead investigation where a child has been exposed to lead, one of the responsibilities of the Health Department inspectors is to identify any and all potential sources. So they do ask about other properties the child is associated with, including schools, daycares, playgrounds. We sometimes are called to inspect areas in different places, as part of the investigation

Hauley

where is the child going and where is the lead coming from.

COUNCILOR DRISCOLL: Thank you. Thank you Mary Margaret, thank you Bryan, and thank you Ken Towsley.

I want to give a special shout out to Stephanie Pasquale who's worked with us so closely on it. Unfortunately she's no longer with the City, but she was definitely a quarterback for us for a long time. I want to acknowledge her presence here and give her a lot of gratitude on her hard work on this project.

First hearing from the public, Jamie Hauley and Paula Harvey. Again, we ask people try to keep their comments to two minutes.

JAMIE HAULEY: I'm Jamie Hauley. Paula and I are co-chairs of TNT South Side Housing Task Force. The first thing that I want to talk about is the fact that no one has mentioned that New York State, in October of 2019 lowered

Hauley

the accessible blood lead level from 10 to 5. That means that under this new blood lead level more children in Syracuse will be identified with lead poisoning. More children in the school will require special services, there will be more work for Deb Lewis as well and for the inspectors. That's a very important issue to raise.

When you look at what's gone on in Flint, Michigan, and we may not be in exactly the same situation, but recently I've been reading about the problems that they're having there. They don't have enough staff in the schools to handle the number of children in need. These are very serious questions that need to be included.

And because of that, a child with lead poisoning in Syracuse is a very serious issue. And I want to urge the strongest measure you can pass to protect the children, and seniors too.

The lead Ordinance is really an

Harvey

essential. And so it's also a moral question, and a social justice issue. We must protect the youngest most vulnerable citizens. Thank you.

COUNCILOR DRISCOLL: Would you like to say more as well?

PALMER HARVEY: Yes, I'm also the co-founder, and I have a little problem, seems all of this stuff is internal that you guys are asking for. I have more of a question. I notice like a lot of apartments have exterior problems with lead on the outside. So it seems to be is there going to be testing on the outside?

Or what is another part? Why are we not doing before, like as part of the inspection. Or if you have rental property, in general should we inspect it before this? Seems like everything we're talking about today is reactionary and not preventative, and that's a huge problem.

Because I've met so many tenants

Harvey

1 whose mothers are crying to me about
2 their children being lead poisoned, and
3 it's not stopping. They have gone
4 through the process you guys talked
5 about, and it's already passed on the
6 parents, of all the things that happened
7 to their children.
8 So has anything been thought of in
9 that way to have more a preventative
10 measure than anything else? I mean
11 yeah, informational measures are good,
12 but parents should know what we do as
13 part of the Southside Task Force. We
14 should go outside every year to educate
15 the neighborhood. But I think it's a
16 huge problem that we're not doing more
17 educating landlords themselves and the
18 importance of why to look seriously.
19 Because the next step coming down
20 the road is a lot of people are thinking
21 about basically suing the landlord
22 because of the amount of care and
23 medical costs. Because the children
24 after lead poisoning, they should put
25 more thought into what they're doing to

Zoeckler

1 the public, you know. Thank you.
2 COUNCILOR DRISCOLL: Thank you,
3 appreciate it. I don't want to
4 mispronounce the name, Jeanette Zoeckler.
5 **JEANETTE ZOECKLER:** Jeanette Zoeckler.
6 So thank you everyone for paying
7 attention to lead and children in this
8 community. I am working for SUNY
9 Upstate, I'm trained in public health.
10 My expertise though is really more
11 around the workers health and how the
12 workers are affected who go in and abate
13 lead.
14 But I come to you also as a mother
15 today, because I was a mother raising
16 children in the City with a child with
17 elevated lead. And so I sort of have
18 training but I also have sort of a
19 closed heart to it as well.
20 Just a quick pass over the Ordinance.
21 I definitely go with Alternative 1,
22 which has more strict standards. And I
23 think that, you know, we have been
24 lowering the lead levels in children in
25 this nation, and I hate to see Syracuse

Zoeckler

1 missing out again on the best of what we
2 can do. And I want to see this lead
3 Ordinance brought up to the standards
4 that EPA and HUD have, while removing
5 those barriers so eloquently brought out
6 tonight.
7 That's what we see over and over
8 again in the community. There is an
9 opportunity for some change, it's really
10 secondary prevention. Some kids are
11 already affected when these matters are
12 going on. When we know that these
13 houses, all, many of them, almost entire
14 neighborhoods really need the attention.
15 So while I commend this, I really do
16 think in this comment period this body
17 should accept some more expertise to
18 look over. And if I can find, just
19 quickly, that you know, we're going to
20 need to have more stringent standard of
21 a hundred micrograms per square feet for
22 the window trauth. That's what's in
23 play. So you have to be very practical
24 about this and come up with some
25 penalties for landlords who don't

Zoeckler

1 comply. But they have this ability to
2 just quickly get out of it. Those
3 loopholes need to be closed.
4 And if you want to look to some
5 people that have done this: In Utica,
6 New York, low blood lead levels were
7 lowered and children's IQ points were
8 raised. And also Rochester. So there
9 is no reason Syracuse can't do this. I
10 thank you for your time and energy on
11 it. I look for greater collaboration
12 between the Department of Health and
13 other bodies that I could name here. So
14 we should work a little more, but work
15 quickly, because there just isn't time.
16 COUNCILOR DRISCOLL: Thank you so
17 much. One good point I would like to
18 remind everyone that we do have a
19 stenographer (court reporter) here
20 tonight, that the Council asked that we
21 record all your comments and put into

Harasta

the record. But I would encourage you you all if you have written comment to e-mail these to us as well at nbd@syrgov.net.

When you come up give your name and information. Next person that signed up is Jesse Harasta.

JESSE HARASTA: Yes, my name is Jesse Harasta, I live in the city of Syracuse on the east side for the last 14 years, as both a homeowner and a resident. Graduated from Nottingham a couple years ago.

But I'm here more today in a professional capacity. I'm also a professor of social science at Cazenovia College. And for the last two years I've been interested in the explosion of the lead question here in Syracuse.

Last semester I took a group of my students, a couple of them back in the corner there. And we had a team that went around to impacted, high impacted and low impacted neighborhoods, in order

Harasta

to try to test the questions about exactly what is it in the social context of high impacted neighborhoods that's leading to greater amounts of peeling paints and that's not present in similar neighborhoods with low impact.

We tested seven different factors and looked at 11 different variables. We went house to house, visiting 349 houses across four census tracts. And during that time we came actually, as the statistics and then the study is not completely done, we're in the middle of analysis right now. But the preliminary data that I want to bring to you today is here that the most significant factor that we found between high impacted and low impacted neighborhoods was peeling paint on the exteriors of buildings.

The chart I have here shows on the left-hand side, high, neighborhoods with high incidence of the lead poisoning. And the right-hand side neighborhoods with low incidence of lead poisoning.

Harasta

And then in the prevalence of the peeling paint, you can see that the blue bar is no peeling paint and the orange bar is high peeling paint.

You can see the neighborhoods with high incidence of lead poisoning have significant levels of peeling paint, and those of low incidence of lead poisoning have the contrast, very low levels of peeling paint. This demonstrates that if the City wishes to intervene and question about the rates at schools and other settings are certainly important. But from what we can see, the first point of easiest intervention is to stabilize paint in the buildings. One other piece has been emerging in our research, we have been doing some archival research into what's been studied in Syracuse is lead poisoning, research and lead poisoning in the historic sense.

I have here maps of elevated blood lead levels for 1998. This is a ten

Fair

year study that was done by Griffith. What we can see, and I have highlighted the neighborhoods, is that the neighborhoods that are today being discussed as high risk neighborhoods were seen as historical neighborhoods for higher risk in 1998. 22 years ago researches identified those places as being problematic, and still continues to be so today.

I think this reinforces the fact that if we want to intervene to stop lead poisoning we need to take a special microgeographical approach we're looking at specific neighborhoods, and approve Alternative 1. Thank you for your time.

COUNCILOR DRISCOLL: Thank you. Our next speaker is Oseanna Fair.

OSEANNA FAIR: Good evening, Councill members. My name is Oseanna Fair. I have a home on the south side of Syracuse that I first rented and then brought from the Syracuse Land Bank. I am also a member of Families for Lead

O. Fair

Freedom Now, I am the qualified branch leader. I did not think 38 years later I would be standing before you still talking about lead poisoning.

Lead poisoning has now become generational for my family. I still take care of a 40 year old brother who suffered severe lead poisoning on the south side of Syracuse. And now 38 years later I find out that my granddaughter has lead poisoning from my own home.

We have to be better, we have to do better. Looking over the Draft Ordinance that you guys have out, the outdated dust wipe clearance levels, the ones that are listed in the Ordinance have been updated in January by HUD. So we need this language to be strong in this Ordinance. We need that new information to be added to the Ordinance.

Families with lead treatment now prefer that you have Alternative 1 of

O. Fair

the Ordinance.

My other question for this body is how do we plan to enforce compliance with this Ordinance or enforce the inspection? Since compliance with the Rental Registry is so low. How do we plan to get this across? This is important. Our children are suffering. Thank you.

COUNCILOR DRISCOLL: Thank you. The next speaker is Charlene Fair.

CHARLENE FAIR: Hi, I'm Charlene Fair, and I do own a home in the City of Syracuse, and obviously it's affected my family. I'm in the Families for the Lead Freedom Now. We do have concern.

The landlords do not complete work to proper standards. And the problem with that is several points that allow landlords to pass up standard work or to delay work for an unacceptable period. We want recommendations: Do not allow inspectors to release properties when only interim controls are in place. And

Powell

to require the placement of internal controls in the case of inclement weather of over a week, and to remove the loopholes for abatement work done by landlords on unpaid family members. Thanks.

COUNCILOR DRISCOLL: Next speaker is I believe Matracia Powell.

MATRACIA POWELL: I'm Matracia Powell. I am basically working with the Democrat Socialist organization and I found out just how bad the lead problem is in Syracuse, and I was absolutely shocked, and really wanted to help doing something about that.

So I really am happy that this Ordinance is now being drawn up. One of our concerns is that the Ordinance doesn't provide definitions for these key terms: Commissioner, director and department. And it is a problem that could lead to legal challenges that would take the lead Ordinance in a court of law. So we think that it should be

Michel

more creative to find more. And support the Alternative 1 because we believe it is stronger than Alternative 2. So thank you.

COUNCILOR DRISCOLL: Next speaker is David Michel.

DAVID MICHEL: I'll be very brief. I must say hearing this conversation of all the HUD requirements I'm glad I retired. As some of you know, my wife Peggy used to work in childcare for 4K, and here's her's, she can't come tonight but here's her comments.

I'll be very brief. I think the people in the audience and the report has described the problem is with lead paint. The surrounding support for the lead paint Ordinance, particularly Alternative 1. As Peter Dunn in the Community Foundation said, the missing link in the efforts to combat lead. As you heard a lot of things coming out, more funding, a lot of collaboration a between the City and the County and

Michel

1 that's good.
2 I'm also on the board of Housing
3 Visions, and their Syracuse project also
4 addresses the lead problem. In some
5 ways in building new homes such as up on
6 the Square project and substantial
7 rehabilitation of existing structures.
8 The projects on the north and east side
9 of the City. Also collaborating with
10 the City and Home Headquarters and the
11 nearest new initiative to build 200 new
12 homes.
13 Our only caveat, and I think
14 Councilor Majok referred to this, it is
15 important when you pass this Ordinance
16 that there be sufficient resources staff
17 and training to implement the Ordinance.
18 I think a couple of you have said that.
19 And was encouraged to read in the paper
20 that proposing two new inspectors. I
21 hope in the budget you would keep that
22 in mind. Thank you.
23 COUNCILOR DRISCOLL: Thank you. Our
24 next speaker is Peter Knoblock.

Knoblock & Kaufman

1 **PETER KNOBLOCK:** Thank you for the
2 opportunity to speak to you folks. I'm
3 a resident of Syracuse, I've been here
4 for 60 years. 50 years ago in my
5 capacity as a child psychologist I began
6 evaluating children with documented high
7 levels of lead. And as has been
8 documented here today, their health and
9 educational needs are extensive.
10 Continued to see these youngsters over
11 the years. And the families struggle to
12 find school programs and providers who
13 recognize their needs.
14 I'm fond of the notion of pay now or
15 pay later. And so I appreciate your
16 efforts to document and initiate the
17 strongest possible initiatives. Thank
18 you.
19 COUNCILOR DRISCOLL: Thank you.
20 Next speaker is Marianna Kaufman.
21 **MARIANNA KAUFMAN:** Hello. Thank
22 you. My name is Marianna Kaufman, I'm a
23 resident of Syracuse. I'm a physician,
24 I'm a parent of two young children.
25

Kaufman

1 I've sat on the boards of the CNY
2 Solidarity Coalition and currently on
3 the Syracuse Peace Council, and I'm
4 active in several organizations that are
5 concerned with social justice and
6 interest in public health.
7 I commend the Council for taking
8 this really important initiative to take
9 a look at this preventible crisis and to
10 give it the appropriate concern that it
11 deserves. I strongly support the
12 Ordinance, and I strongly support
13 Alternative 1.
14 I do have, in reading through the
15 Ordinance, I do have one concern about
16 the definition of what is considered
17 permanent. The bill defines its goal is
18 to create permanent protection from
19 lead.
20 The removal of the lead can be
21 considered permanent. But encapsulating
22 the lead with paint should not be
23 considered permanent. And especially
24 paint that encapsulates the lead on
25

Kaufman & Cosentino

1 exterior surfaces in Syracuse is not
2 going to be permanent, it's not going to
3 last twenty years. It might last
4 several years, especially on outside
5 surfaces.
6 So the recommendation would be to
7 redefine the term permanent as a lead
8 remediation, the permanent removal of
9 walls or soil bearing lead paint. And
10 that we should define encapsulation as
11 abatement. And so the language should
12 be changed that encapsulation should be
13 continued to be inspected on a regular
14 basis. Thank you.
15 COUNCILOR DRISCOLL: Thank you.
16 Please submit that in writing as well.
17 Our next speaker is Crystal Cosentino.
18 **CRYSTAL COSENTINO:** I'm Crystal
19 Cosentino, and I work for Home
20 Headquarters as a Deputy Director.
21 Thanks for the opportunity to speak
22 tonight.
23 Home Headquarters has been committed
24 to creating, preserving and financing
25

Cosentino

healthy housing since we first opened our doors back in 1996. As a Community Development Financial Institution we have often financed home improvements that not only improve the quality of housing -- a new roof, repair sewer lines, new furnace, and also improves the occupants health.

In 2015, together with the CNY Community Foundation and many community partners, many of them here tonight, we embarked on the creation of the Green and Healthy Homes Initiative of Greater Syracuse. A national model focused on coordination and collaboration and a single stream intervention process to address green, health and safety issues in the home. Our City here and our County along with nine other partners signed a compact committing to this work.

In 2017 Home Headquarters and the Green and Healthy Homes initiative of Greater Syracuse facilitated several

Cosentino

meetings to develop a prioritized approach to prevent lead poisoning. Our vision was to see a decrease in lead hazards in the built environment and a decrease in the number of children with elevated blood lead levels. While ambitious, we knew this would be attainable.

It contained four focuses areas: Policy and enforcement, the built environment, health and medical and community awareness and education. Many activities are underway to address lead and its impacts. The approach is multifaceted and comprehensive, and we are beginning to see real impacts from our activities.

The nearly 300 page Draft Environmental Impact Statement outlines in detail the need for this. From understanding how lead, even in small quantities, is impacting children in our community through data contributed by the local Health Department to a scan of

Cosentino

housing conditions here in the City. Currently we have a reactionary system. A child is poisoned and then we mobilize services. Wouldn't a system where we address lead before it becomes a problem be a far better way of handling things. It would reduce stress, health and economic impacts caused by lead poisoning.

We echo others, like the Community Foundation, who have already shared in other venues that an Ordinance such as this will help us remain vigilant, proactive and collaborative. The City's efforts, through this Draft Lead Ordinance, will comprehensively improve housing quantity and resident health. Home Headquarters is in support of the City amending it's property conservation code to include addressing and correcting the presence of deteriorated lead-based paint. And we appreciate this public meeting to learn more, and we expect to submit written comments

Carroll

before the March deadline.

COUNCILOR DRISCOLL: Thank Green and Healthy Homes initiative for all the work they have done and Katie Bronson, who is another person so long on this issue and is now in a different position, but we commend as well.

Up next is Bobby Carroll, and then at the suggestion of my bright Councilor, Councilor Greene, on deck is Mary Cunningham. So first Bobby Carroll from DSA, and on deck Mary Cunningham.

BOBBY CARROLL: My name is Bobby Carroll, I just moved here in August, I've been here in Syracuse. One thing about that I wasn't aware of was that there is like an online place you can look up where there is lead poisoning in certain properties and whatever. If you have to go to a physical building to do that, so for me coming from out of state, that's kind of a burden, I'm sure other people have an issue with that. Might be nice to know like from not only

Cunningham

the community you're trying to rent from that the entire property has issues with that. It would be nice to have a sort of transparency in an online database, instead of a physical building. So I just wanted to bring that point up.

And then wanted to reiterate that Alternative 1 should be considered. That's the stronger option for the Ordinance. Thank you.

COUNCILOR DRISCOLL: Thank you. Up next we have Mary Cunningham, and on deck we have Evan Brzostowski.

MARY CUNNINGHAM: Thank you for doing this. I mostly agree with Marianna Kaufman who was talking about. I've lived in Syracuse in a 1914 house for years and a 1920 house for 13 years.

The idea of encapsulating the outside paint is a wishful thinking for twenty years. I know what it takes to take care of a house. So I want to stress to you we really need to make it maybe what is suggested possibly every

Cunningham

six years but certainly needs to stay under regular supervision and not just be pushed under the bridge.

One of the things we know is that lead poisoning, we can only identify it in children, but it lasts their whole life. And it affects them and their families and our community. That we are looking at not 418 or 468 children in the year, it's over 22 years, it's over many years that we are accumulating. We have a huge number of children, really incredible number of children who are affected their whole lives.

And the expense to their family and we as a community could be ameliorated if we would take care of it and spend the money now and push for the County to put in more money. There is more money there, there should be more than 3.5 million.

COUNCILOR DRISCOLL: Up next, Evan Brzostowski, and on deck Nathan Currier. Is Evan here?

Brzostowski

EVAN BRZOSTOWSKI: Hello, I thank you for welcoming me up. I'm Evan Brzostowski, I'm a member of the American Iron Front, we are a group that's kind of antifascists in the area. And I was wasn't really planning on coming up here today. But it really caught my attention and to me it just kind of seems like a no brainer to be perfectly honest.

As the professor over there said, that this has been going on, the last study was in 1998. I was born in 1998, so this is something that's been going on since, you know, I was a little me down here you know. And so sorry if I'm a little scared it's my first time being up here. Especially this should be put through. And Number 1 should be put through especially as well. So that's my personal opinion. Thank you for letting me come up here.

COUNCILOR DRISCOLL: Thank you. For the record I was born in '79. The first

Currier

year that lead was outlawed, and been a problem. Nathan Currier.

NATHAN CURRIER: Hi, thanks for letting me come here and speak. My name is Nathan Currier, I'm a student at OCC, part of the American Iron Front and SRA as well. So I want to speak on the tenants rights issue. If there is any sort of legislation bill that goes through involving this, tenants need workers rights for people that have to deal with the lead paint removal should be one of the utmost priorities.

I remember one of the Council brought up that one of the tenants and landlord, pretty much being screwed out with tenants not being able to receive any sort of help or aid due to that. That should almost be criminal.

As someone who is actively participating in the harm of others, without -- without knowing the information of like what lead can do. Thank you, very much.

Traynor

COUNCILOR DRISCOLL: Thank you, very much. Mary Traynor is up next, and on deck we have Greg Smith.

MARY TRAYNOR: Hi, my name is Mary Traynor. I'm here on behalf of the Syracuse Tenants Union, also an attorney with the Legal Services of Central New York.

And I was at the committee meeting this afternoon, which really had no surprises. And I just really say that we need to focus on the enforcement mechanisms here. Our Code Enforcement Department, well intentioned as it may be, is really failing this City in a big way.

The Rental Registry has not really worked the way it was intended to. I think that it could be amended in many ways so that just to improve enforcement.

And we need to get serious about fines. You know, all these programs seem to be reactive, where they're triggered by a little child being

Traynor

poisoned. And then the big thing is how do we get the landlords to accept our public funds, our money, okay? And if they don't do it, what happens? Nothing. So we really need to look at that part, because if we're not going to follow through and make sure that the buildings and the apartments are fixed, you know, the tenants will be evicted, there is no protection from that. So they would be just, you know, one family move out and another family move in. And nothing will change, you know.

And the problem, I believe you said you had about 76 applications in, that 70 were not completed. So that's not working. That's not working. And I would hope that there is right now a plan to fix that. Like I would hope codes has a plan to actually fix these things. Instead of just, you know, continuing business as usual year after year.

So thank you for doing this, Joe. I

Smith

know two or three years ago you first started talking about lead and here we're considering an Ordinance. It's a huge improvement. I want to thank you for that.

COUNCILOR DRISCOLL: Thank you, Mary. Greg Smith up next. On deck we have Stephanie Kenific.

GREG SMITH: I'd like to talk about the dust wipes. Using the term investigation in finding what was the source of a problem. And this is very much a forensic sort of thing. I've worked, I'm a landlord, and my family and my crew and I have been working in the west side on a daily basis for 40 years providing safe housing.

But anyway, you have to find what the vector is, how the lead gets into the kid. Now, dust on the floor. Little kids crawl around on a dirty floor, get dirty hands and dirty toys in their mouth. That's pretty simple. But how did the lead get on the floor?

Smith

Now as far as the dust wipes go, I think we need to differentiate between lead from an environmental source and lead from the structural source. Now if you have deteriorated lead or any kind of a violation or you've done any kind of renovation work. Yes, that falls completely on the owner, he owns the problem. It's your obligation to prove that you've done everything right and that you've cleaned it up.

But if you get a case where there is no visible deterioration, there is no, you know, say for example, you've got a place that's been abated. And it has dust wipe fails. Well, clearly the dust was tracked in. Now Home Headquarters has a very informative video. And one of the things that they recommend for people to protect their kids is simply take your shoes off at the door. Because there is a legacy of lead in our environment from leaded gasoline that was around for years. And virtually all

Smith

1 dirt has a certain percentage of lead in
2 it. So the lead that gets tracked in.
3 Yes, this is an issue. It's essentially
4 though a housekeeping issue.
5 And the reason I feel we need to
6 distinguish this is, one, I don't view
7 housekeeping as within the scope of the
8 services we provide. And I don't think
9 any landlord does either, you know. If
10 we make this something that the landlord
11 is responsible for, the protocol will be
12 that every three years somebody goes in
13 with a mop, right ahead of the guy with
14 the dust wipe, and wipes it up and you
15 get a dust wipe and it passes.
16 You know, think back to when you
17 were cramming on the last exam you took.
18 Do you remember any of that stuff? No.
19 And that's exactly the analogy here.
20 What you've got is every three years
21 you've got a very sterile surface that
22 passes the test, but we don't address
23 the ongoing problem. Now we're --
24 COUNCILOR DRISCOLL: We're out of

Smith

1 time, Mr. Smith.
2 **GREG SMITH:** Real quick, we're
3 patterning this after the law in
4 Rochester which was very successful in
5 lowering high lead levels, but actually
6 not so much on low lead levels. So they
7 have an okay program. But you know
8 what, okay is not okay. If we're going
9 to solve this problem, everyone needs to
10 work together. And what we need to do,
11 we're going to be losing a teaching
12 opportunity if we convey the impression
13 that these housekeeping things that are
14 critically important to reducing levels
15 on the landlord issue, we need to use
16 this opportunity to get the parents
17 involved in protecting the children
18 also. Thank you.
19 COUNCILOR DRISCOLL: Thank you,
20 Mr. Smith. Up next is Stephanie
21 Kenific. On deck we have Rich Puchalski.
22 **STEPHANIE KENIFIC:** Hi, my name is
23 Stephanie Kenific. I'm a resident of
24 Syracuse, I'm a teacher and I am also a
25

Kenific

1 member of the Syracuse Party for
2 Socialism and Liberation. I want to
3 really echo and amplify what Comrade
4 Bobby Carroll mentioned about the
5 transparency of lead poisoning and
6 abatement.
7 Currently records are public, but
8 only to those that can visit the office
9 in person during business hours. As a
10 teacher I know very well that information
11 is not truly public until it is really
12 accessible to all. That means digitally
13 and available in multiple languages.
14 The Party for Socialism and
15 Liberation that I represent has
16 experience in our neighboring Town of
17 Geneva, New York addressing lead
18 contamination in homes. We know well
19 the painful realization that families in
20 contaminated housing may face. That
21 their homes can be poisoning them.
22 It's the City's responsibility to ensure
23 that families have all the necessary
24 information in order to confront that
25

Puchalski

1 terrible reality. Thank you.
2 COUNCILOR DRISCOLL: Thank you.
3 Mr. Puchalski up next, and Brendan
4 Brooks on deck. Rich, I was nervous to
5 not to see your name here, what's going
6 on?
7 **RICH PUCHALSKI:** I didn't write that
8 down. All right, Rich Puchalski,
9 Executive Director Syracuse United
10 Neighbors. Been around for 42 years,
11 active on the south, near west side,
12 Skunk City neighborhoods, where the
13 highest concentration of lead houses are
14 located.
15 You know, kind of interesting to
16 show up here at noon, getting blocked
17 out from speaking on Council business.
18 Now coming back and everybody has a lot
19 of food for thought for the Councilors.
20 Do we thank Councilor Driscoll? Or did
21 I get just lucky?
22 You know, the Council office has
23 money. I see the budget. It's too bad
24 about 1,500 copies of the Ordinance
25

Puchalski

wasn't on the table, Mr. Driscoll. Now it's too bad -- is it in the libraries?

COUNCILOR DRISCOLL: It is available online on the web site.

RICH PUCHALSKI: I said libraries.

COUNCILOR DRISCOLL: Not yet. Not yet, Rich.

RICH PUCHALSKI: 2nd. You know I understand the Ordinance doesn't have the strictest federal EPA lead levels in the Ordinance. Put it in there.

3rd. You know after today the dust will settle, it will probably be a lot of lead dust. And where are we going? You know, is the energy going to transform to the neighborhoods on the south and near west side, for example?

I want to see a public relations budget and an outline of what you're going to do. You know, it's kind of interesting you sometimes see banners downtown. Well, what about banners in the neighborhoods to talk about this?

Once upon a time I got lucky and I

Puchalski

got on the police van. That's a pretty expensive piece of taxpayers money in the police van. Why not a lead van that rolls around in the neighborhoods, stops, maybe a couple of workers that live in that neighborhood that does outreach, and come on and see what the lead fight is all about.

COUNCILOR DRISCOLL: Thank you.

RICH PUCHALSKI: I ain't done, you don't cut me off.

COUNCILOR DRISCOLL: No, we don't have the time.

RICH PUCHALSKI: Councilor Hudson might do that, but not you. I want to see a budget. I want to see fliers, you know, anyway. And lastly, my last point, since you guys don't do anything, if you've got landlords that don't comply, send their name and address to the SUN office 1540 South Salina Street. Because this is enough. This is criminal what these landlords are doing.

COUNCILOR DRISCOLL: Thank you. Up

Brooks

next Brendan Brooks. And our last speaker is Mr. Peter King. If anyone else would like to sign up, sign up now or forever hold your peace. Then we're done. We're closed. I misspoke. Okay, Brendan Brooks and then Peter King.

BRENDAN BROOKS: I'm Brendan Brooks from Interfaith, LLC. Hoping to move to the south side relatively soon here. One of the things with the numbers. Three and-a-half million dollars, just looking at some of the data, like you're talking about addressing on average about 3 percent of the homes that are possibly affected. And we're only, if you don't have 70 of the 76 in full, I mean if we don't get the money committed I don't know how that works.

I mean I'm a big proponent of supply and demand. If you show the work, you know, you can go ahead and get more funding. That's something I would really, if we canvass the neighborhood and get votes. If we go to the DSS and

King

they have voter registration on back packets, you know that there is correlation between poverty and this issue. That's a hit list right there. You know, people that are on Section 8. People that are getting these services. Let's get out there and be proactive about it. That's all I've got.

COUNCILOR DRISCOLL: Thank you Brendan. Peter King.

PETER KING: Good evening Councilors. I actually, from what I've read of the document and from what I understand from what I hear, I completely approve of this as a first step. I think it's an excellent step. Long needed in Syracuse. And I think also that the comments made today also are very good at strengthening this document.

The one thing I might say also, I am a Syracuse resident, is that a lot of the problems that seem to encompass or potential problem points relate to

King

what's called in the literature your expose all. How an individual might come to be cumulatively affected by lead. And so these are all kinds of sources. There is literature specifically about Syracuse and about for example, the soils, vacant lots. There is actually a number of ways that that can happen.

And so just in the sense of a liability, maybe to be aware of that literature. But also as in forward thinking, why stop with just the housing, there is a lot of potential for remediating the soils. There is actually ways to remediate soils that have been done in places like New Orleans, and also in Norway and other countries. This is a worldwide problem.

One concept which could be pursued is braiding funding so that you have HUD funding, you have other kinds of funding, so you get funding from different sources and you mix different

Hudson

programs where applicable. And so thank you, very much.

COUNCILOR DRISCOLL: Thank you. President Hudson had a few remarks she wanted to make. Any other Councilors like to make any closing remarks, feel free.

PRESIDENT HUDSON: First I want to say thank you for everybody in attendance and thank you to everybody at the table. And I'm hoping that we can take some of this information. Because full disclosure, I was a 29 year old woman when I bought my house on the south side. I lived in my house for 30 years. I sold my house in 2016, I think I did. And up until that point I had a child that lived there with me, and I wondered why he was having all these behavioral problems. Know why? I lived in the house for 30 years full of lead. No one ever told me that until I sold this property.

So I think that it's better to start

Driscoll

educating the younger buyers before they buy these homes before their children are affected, because I seen it with my own eyes. I see it happening. So I just want to let you know, you're preaching to the choir because I'm part of that issue.

So I do hear you and I appreciate everybody coming out and giving us your information and our thoughts.

COUNCILOR DRISCOLL: Thank you. I want to give my gratitude to President Hudson. When I started to run for Councill she was, you know, waving the flag on this issue, and she's been camping on it for many years, and great to have my fellow Councilors working with me on this. Any other comments from the Council? Anybody? Okay, thank you. I want to thank everyone for the comments.

Please know that we like them submitted written as well, and to some of the suggestions that were made, I

would like to say my door is open, jdriscoll@syrgov.net. We can work together on this.

[Conclusion of public hearing].

* * * *

C E R T I F I C A T E

This is to certify that I am a Certified Shorthand Reporter and Notary Public in and for the State of New York, that I attended and reported the above entitled proceedings, that I have compared the foregoing with my original minutes taken therein and that it is a true and correct transcript thereof and all of the proceedings had therein.

John F. Drury, CSR

Dated: February 17, 2020