

### **III.O Significant Adverse Impacts that Cannot Be Avoided (IV)**

**O. Significant Adverse Impacts that Cannot be Avoided (IV)****Comment IV-1:**

Despite these requirements, the DEIS contains no discussion whatever on this subject – it discusses neither the effect of climate change on the Project's construction and operation, nor the Project's effect on GHG emissions. Rather, the DEIS contains a few paragraphs of vague assertions of the Applicant's "interest" in efficiency and sustainability, with no analysis of, let alone commitments to, GHG issues. (DEIS pages VII-1 to VII-2.) (See ASR's comments on the Other SEQRA Chapters chapter for additional comments regarding GHG impacts.) These failings must be remedied in the Supplemental DEIS.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response IV-1:**

See Response III.C-21.