



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 14 2005

Robert Arnold
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
North Pearl Street
Albany, New York 12207

Dear Mr. Arnold:

The Environmental Protection Agency (EPA) has reviewed the New York State Route 25 over the Long Island Railroad Town of Southhold, Suffolk County, New York, draft environmental assessment (draft EA). This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C. 7609, PL 91-604 12(a), 84 Stat. 1709), and the National Environmental Policy Act.

The stated objectives for the project are to restore the bridge condition, improve safety, provide bicycle access, and provide drainage systems that will reduce the discharge of roadway runoff to the surrounding wetlands. Five feasible bridge replacement alternatives were considered in the EA, with the replacement being on either the east or west side of the existing bridge. The EA does not offer a preferred alternative. A deficiency for the document is that the no-build alternative is not given any consideration. While a no-build alternative, which in this case should have been both the repair and maintenance of the bridge, may not seem feasible, it is a necessary aspect of the alternatives analysis. NEPA states that keeping the no-build alternative is important because it allows a basis for comparison amongst other alternatives. Please ensure that all future environmental assessments contain a no-build alternative.

While we appreciate and wholly support the project objective of reducing or eliminating polluted roadway runoff discharging to the adjacent wetlands, we noted that the EA is not very specific regarding how that would be done. The EA suggests that the roadway runoff can be treated with an oil-grit separator located on either side of the roadway depending on the selected alternative, but does not indicate if that is a sufficiently effective treatment of the runoff to meet the water quality standard. Also, the EA does not discuss the discharge point for the runoff. We recommend that even the treated stormwater runoff should be directed away from the existing wetland complexes and streams for discharge. The Finding of No Significant Impact (FONSI) should provide greater detail regarding these issues.

In a related matter, the EA did not discuss the functional ability of the culverts in maintaining the hydrologic flows for the wetlands and waters on either side of the roadway. We noted that the wetlands are tidally influenced and that the road embankment of existing Route 25 isolates wetland #5 and is an impediment to wetland #5 functions. Given the tidal influence and the EA's acknowledge of the roads impediment to that influence, we recommend that regardless of the selected alternative, the new project should propose a remedy such as more and/or large(er) culverts between the east and west side wetlands or other method to restore connectivity of the wetlands.

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We are also concerned with the mitigation proposed for impacts to wetlands and in particular impacts to wetland #5. Wetland #5 is described as a "depressional closed system," but in essence is a fairly functioning, 30-acre, forested wetland surrounding a pond that has lost some function due to its isolation. The EA indicates that if alternative V is selected, the greatest amount of impact to any wetland will occur to wetland #5, but the impacts will be mitigated through on-site enhancement and restoration at a 1:1 ratio. We agree with the EA that this wetland would be a prime candidate for enhancement and restoration, however, we strongly recommend that enhancement and restoration mitigation for forested wetlands such as #5 should be at a greater than 1:1 ratio. Forested wetlands are traditionally difficult to restore, have a low success rate, and require long-term monitoring, thereby demanding a greater ratio to ensure at least 1:1 is ultimately achieved. The EA did not discuss how much of the area around wetland #5 is available to be converted into forested wetland. We would point out that expansion of the pond and the open waters, at the expense of the vegetated area, would not be considered appropriate mitigation on a 1:1 basis. A critical component of the success for the area to be restored would be the restoration of the connectivity between wetlands #1, #2 and #5. Also, the EA did not discuss if there would be temporary impacts to the wetland areas from the construction of the new bridge or offer methods to minimize impacts to waters and wetlands during construction. We suggest that the FONSI offer a more definitive wetland mitigation proposal that also contains a greater mitigation ratio and addresses the isolation issue.

Lastly, we have a concern with the lack of an indirect and cumulative impacts discussion in the draft EA. The draft EA very briefly discusses indirect and cumulative impacts only in terms of traffic and mentions that the project will not have an effect on the potential for future development. However, indirect impacts are those that are caused by the action but may be distant in time or distance; while cumulative impacts are the sum of all direct, indirect and secondary impacts resulting from all projects impacting a particular resource. For example, this project will have an effect on the wetlands of the area, water quality, the floodplain and the sole source aquifer. If there are other projects in the area that also have an impact on these resources, they must be quantified in a cumulative impacts analysis. Therefore, the draft EA, in order to provide a true cumulative impacts analysis should have identified all past, present and foreseeable future projects that have an impact on these and any other resources that are directly affected. We would appreciate seeing such an analysis included with the FONSI.

Thank you for the opportunity to comment on this project. If you have any questions concerning our comments, please contact David Carlson of my staff at (212) 637-3502.

Sincerely yours,



Grace Musumeci, Chief
Environmental Review Section
Strategic Planning and Multi-Media Programs Branch

cc: M. Bocamazo, P.E., NYSDOT