



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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NEW YORK, NY 10007-1866

APR 10 2006

Robert J. Smith, EA Coordinator
Environmental Analyst
CENAN-PL-ES
26 Federal Plaza, Room 2151
New York, New York 10278-0090

Dear Mr. Smith:

The Environmental Protection Agency (EPA) has reviewed the draft environmental assessment (DEA) for the Atlantic Coast of New York, Jones Inlet to East Rockaway Inlet, Island of Long Beach, New York Storm Damage Reduction Project. The proposed action is a modification to the project which received a favorable Record of Decision in January 1999. The project covers approximately 6.4 miles of oceanfront along Long Beach Island, from the eastern edge of Point Lookout to the western edge of the City of Long Beach.

The recommended plan, as discussed in the DEA includes the preferred plan (identified in the 1995 Feasibility Report and subsequent 1998 FEIS filing) with post-Feasibility modifications as detailed in the Limited Reevaluation Report accompanying the DEA. The new project reduces the overall beach fill and borrow area removal volumes, and decreases the overall footprint of the project. The Corps has also agreed to avoid direct adverse impacts to shorebirds by restricting construction activities to September 1 through April 15 each year.

While we applaud the Corps efforts to reduce the environmental impacts of this project, we have a few comments on the air quality and general conformity (GC) section of the DEA.

1. The NAAQS discussions on Page 31 are out of date in that the project area is now classified as moderate ozone nonattainment and nonattainment for PM2.5 which is now a regulated pollutant.
2. While the emissions from employee trips may be very small, the emissions should be estimated. If those employee trips, and subsequent emissions, are already accounted for in the state Transportation Improvement Plan, that fact should be verified with the appropriate Metropolitan Planning Organization.
3. Emissions from non-road equipment (except for marine vessels) should be determined using the latest NONROAD emissions model. It appears that the non-road emission factors used in the GC analysis are from the 1991 Nonroad Engine and Vehicle Emission Study which is now outdated.

4. The analysis does not include a demonstration of conformity. Should the New York State Department of Environmental Conservation concur that project emissions offsets are not required if the project is constructed entirely outside of the ozone season (May 1 – September 30), please include a concurrence letter with GC analysis and determination.

Even if project emissions do conform to New York's State Implementation Plan, you may want to consider utilizing the pollution reduction methods for on- and off- road vehicles being used by the Metropolitan Transportation Authority (MTA) for the construction of the Lower Manhattan Redevelopment Projects. The Fulton Street Transit Center Construction Environmental Protection Program Report discussing these methods can be found at: <http://www.mta.nyc.ny.us/capconstr/fstc/documents/cepp.pdf> or you may call Mr. Ajay Singh, Chief Environmental and Sustainability Officer for MTA Capital Program Management at 646-252-4398.

Thank you for the opportunity to comment. Please call Lingard Knutson of my staff at (212) 637-3747 if you have any questions.

Sincerely yours,



Grace Musumeci, Chief
Environmental Review Section