

Project : Date : 

***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 Attached "Reasons Supporting Determination of Significance"

**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 Governor's Office of Storm Recovery ("GOSR"), an office of the Housing Trust Fund Corporation ("HTFC") 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.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: Carlls River and Connetquot River Watersheds and Southwest Sewer District #3 Sewer Project

Name of Lead Agency: Governor's Office of Storm Recovery

Name of Responsible Officer in Lead Agency: Matt Accardi

Title of Responsible Officer: Assistant General Counsel

Signature of Responsible Officer in Lead Agency: *Matt Accardi*

Date: *June 12, 2018*

Signature of Preparer (if different from Responsible Officer)

Date:

**For Further Information:**

Contact Person: Matt Accardi, Assistant General Counsel

Address: Governor's Office of Storm Recovery 25 Beaver Street, 5th Floor, New York, NY 10004

Telephone Number: (212)480-6265

E-mail: matt.accardi@stormrecovery.ny.gov

**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>

**PRINT FULL FORM**

## SEQRA EAF PART 3

### Reasons Supporting Determination of Significance

#### **Carlls River and Connetquot River Watersheds and Southwest Sewer District #3 Sewer Project**

#### **Town and Village of Babylon; Town of Islip; Suffolk County, NY**

June 12, 2018

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The Governor's Office of Storm Recovery (GOSR), an office of New York State Homes and Community Renewal's Housing Trust Fund Corporation (HTFC), has established Lead Agency status pursuant to the State Environmental Quality Review Act (SEQRA) (ECL Sections 3-0301(1)(b), 3-0301(2)(m) and 8-0113 and 6 NYCRR Part 617) for the environmental review of the proposed Carlls River and Connetquot River Watersheds and Southwest Sewer District #3 Sewer Project (the Proposed Action) in the Town and Village of Babylon and Town of Islip in Suffolk County, New York. In accordance with SEQRA and its implementing regulations found at 6 NYCRR Part 617, GOSR has established itself as SEQRA lead agency and has classified the Proposed Action as a Type I action. A full Environmental Assessment Form (EAF) Part 1 regarding the Proposed Action has been circulated for review and comment to interested and involved agencies. The Part 1 of EAF considered two alternatives, a gravity sewer and a low-pressure sewer system. However, advancement of the designs for a gravity sewer system indicates that a low-pressure sewer system is the preferred alternative. Nonetheless, GOSR has evaluated both alternatives under the criteria found under 6 NYCRR 617.7(c), completed Parts 2 and 3 of the EAF, and determined that the Proposed Action would not result in significant environmental impacts.

This memo is incorporated by reference into Part 3 of the EAF and serves as the rationale for GOSR's determination of significance. For more detailed analysis of impacts, refer to the *Draft Environmental Assessment Carlls River and Connetquot River Watersheds and Southwest Sewer District #3 Suffolk County, New York* (under separate cover). The Federal Emergency Management Agency (FEMA) is the federal responsible entity for purposes of compliance with the National Environmental Policy Act.

#### **Impact on Land**

The Proposed Action would involve excavation for installation of wastewater collection laterals and sewer mains with the entirety of the project occurring over a 1.5 to 3-year timeframe. Impacts on soils would occur from installation activities, which would disturb soils from the construction of new sewer main and service laterals to existing conveyance via extended interceptors. In the Carlls River and Connetquot River Expansion Areas, sewer lines would be installed at a rate of approximately 200 feet per day in any one location. With most residential blocks being about 600-800 feet long, impacts from construction activity in any one area would last approximately 3-4 days. In the SSD #3 Laterals Area, it is estimated that two or more service lateral connections could be performed in 1 day by a single crew. If all properties along an entire street were to be connected, then multiple crews would likely be involved and construction

activities on the street would only last several days.

Under the gravity sewer alternative, sewer mains in the Carlls River and Connetquot River Expansion Areas would be installed using open cut excavation along the length of each roadway segment where a new line is needed. The maximum and average depth of excavation would be 25 feet below ground surface (bgs) and 12.5 feet bgs, respectively for the Carlls River Expansion Area and 25 feet bgs and 10.5 feet bgs, respectively for the Connetquot River Expansion Area. For both areas, trench widths would be 10 feet. Excavation for service laterals in all three areas would be installed using a small bucket backhoe with the disturbance confined within a 1.5-foot-wide trench at an average depth of 10.5 feet bgs. While the overall project would excavate approximately 228,291 cubic yards (cy) of material, the majority of this would occur in existing street rights-of-way that have been previously developed and disturbed by the installation of other utilities. Additionally, trenches would be backfilled with the excavated material. It is estimated that 10% or less of the excavated material would be hauled away to a suitable and permitted location. Given the disconnected and disparate areas where construction would occur, the amount of material removed from any one site (e.g. street block) for disposal would be less than 750 cy/1000 tons. Additionally, for each of the four areas in the Carlls River Expansion Area where pipe jacking operations would occur to go under the river (two locations), under wetlands (one location), and under Southern State Parkway (one location) less than 750 cy/1000 tons of material would be excavated with 10% or less hauled away to a suitable and permitted location. Under conditions of normal operation, the Proposed Action would have negligible impacts on soil resources.

If the preferred alternative to install low-pressure sewers were selected, directional drilling may be used where possible to minimize the amount of excavation required. Under the low-pressure alternative, the system would utilize piping ranging from 2 to 6 inches in diameter compared to 8 to 48 inches in diameter piping of the gravity sewer alternative. Additionally, under the low-pressure alternative, no pump stations would be necessary, which would further minimize the quantity of excavated material. Therefore, should excavation be required in locations where directional drilling is not practical, significantly less material would be excavated and even less material would be hauled away.

Best Management Practices (BMPs) would be employed during construction to minimize potential temporary soil erosion in accordance with the NYSDEC SPDES General Permit for Stormwater Discharges from Construction Activity, Erosion and Sediment Control Plan, and Stormwater Pollution Prevention Plan (SWPPP).

As a result, the Proposed Action would not result in significant impacts on land.

### **Impact on Surface Water**

Construction of the Proposed Action would require activities such as clearing, grading, excavating, dewatering, and stockpiling soil and other earthen materials, which could adversely affect water quality if not properly managed. Construction of the collection system would require excavation for sewer pipes, as well as clearing, grading, and excavation for the two pump stations and associated facilities proposed in the Carlls River Expansion Area under the gravity system option, and clearing would be required along an easement in the Connetquot Expansion Area.

Such disturbance could cause erosion and sedimentation runoff into nearby surface waters, resulting in potential indirect, adverse impacts on surface waters. However, the use of appropriate BMPs and adherence to a SWPPP would minimize or avoid these impacts. With the exception of the Carlls River Expansion Area (see below), no construction would occur within the vicinity of the surface waterbodies in the project area nor would any work directly modify them. Because construction activities must be undertaken in conformance with a SWPPP, at most they would result in short-term, minor, adverse impacts on water quality due to soil erosion during construction.

In the Carlls River Expansion Area, the construction of one of the two pump stations for the gravity sewers would affect a wetland and the regulated area adjacent to the wetland. In addition to short-term, minor impacts during construction as described above, construction of the pump station east of the intersection of Brook Avenue and Jefferson Avenue would result in long-term, minor, adverse impacts from the direct removal of approximately 2,500 square feet (0.06 acres) of freshwater forested/shrub wetland and its New York State 100-foot regulated area adjacent to the Carlls River. The 0.06 acres of lost wetland and wetland adjacent area would be mitigated by providing compensatory mitigation in compliance with applicable federal and state standards. Compensatory mitigation would involve creating or restoring wetlands to replace the lost functions and values of the affected wetlands. Under the preferred alternative, a low-pressure system, no pump stations would be necessary and the above impacts on wetlands would be avoided.

Within the Connetquot River Expansion Area and the Southwest Sewer District #3 Laterals Area, there would be no direct impacts to wetlands during construction of the sewer mains and laterals. However, the construction activities could disturb the New York State regulated areas adjacent to tidal and freshwater wetlands resulting in indirect, short-term, minor, adverse impacts on wetlands from sedimentation. Construction activities for the service laterals and sewer mains for gravity and/or low-pressure sewers would occur in New York State regulated areas adjacent to tidal and freshwater wetlands and would likely be within previously disturbed existing rights-of-way (e.g. streets) or landscaped portions of developed lots. Installation of grinder pumps for the low-pressure sewer system could also occur in regulated areas adjacent to wetlands. Construction activities (e.g., excavation) would disturb the ground surface and associated vegetation, directly disturbing some New York State regulated areas adjacent to tidal and freshwater wetlands and increasing the potential for indirect, adverse impacts on wetlands from soil erosion and sedimentation. Although some of the proposed alignments for the sewer mains in the Carlls River Expansion Area would cross wetlands associated with the Carlls River in three locations (directly crossing the Carlls River in two locations and crossing wetlands in a third location), disturbance of and direct, long-term, adverse impacts on wetlands would be avoided with the use of the construction techniques such as pipe jacking or directional drilling. Construction in areas adjacent to state-regulated wetlands would be regulated by the NYSDEC Freshwater and Tidal Wetlands Permit Program to ensure that impairment of wetlands functions is avoided or minimized. Compliance with the permitting and regulatory requirements, including the use of BMPs, would prevent or minimize indirect adverse impacts on wetlands from erosion and stormwater runoff. In all areas, New York State regulated areas adjacent to tidal and freshwater wetlands or upland areas that are temporarily disturbed due to excavation, would be returned to pre-construction conditions to avoid long-term impacts; the pre-existing conditions likely consist of impervious surface or vegetation typical of developed lots.

The Proposed Action would not discharge wastewater to groundwater or directly to a surrounding waterbody. Wastewater from the 5,961 parcels in the project area currently processed by on-site wastewater treatment systems (cesspools and septic tanks) would be collected via new service laterals and sewer mains and treated at the Bergen Point Wastewater Treatment Plant (WWTP). The Bergen Point WWTP holds a NY State Pollutant Discharge Elimination System (SPDES) permit for 40.5 mgd that applies once the current 10 mgd upgrade is completed (Permit No. NY0104809). The capacity of the Bergen Point WWTP would accommodate the additional 1.6 mgd collected from the Proposed Action. The added effluent to the WWTP would be treated and then discharged via the existing outfall to the Atlantic Ocean in accordance with the terms of the SPDES permit. Implementation and operation of the Proposed Action would minimize the risk of future releases of wastewater into groundwater and nearby waterways during future flood events. By using the following approach applied by Dvirka and Bartilucci (2014): Nitrogen Load (pounds/day) = 5,961 parcels X 3 persons/parcel X 10 pounds/person/year X 1 year/365 days, the reduction in total nitrogen load from the 5,961 parcels in the project areas would be 490 pounds per day. Thus, implementation of the Proposed Action would have beneficial effects on water quality of surface waters in the project area. The reduction in nitrogen and pathogen loading would be beneficial to the rivers, creeks, lakes, and ponds in the project area, as well as to the Great South Bay.

As a result of the above-described mitigation and required procedures, the Proposed Action would not result in significant impacts on surface water.

### **Impact on Groundwater**

Implementation of the Proposed Action would reduce nitrate loading to groundwater, as well as other waste constituents typically found in household wastewater effluent. As a result, the Proposed Action would have a long-term, beneficial effect on groundwater quality in the project areas. Similarly, the impact on the water quality of private wells would also be long-term and beneficial because these wells typically draw from the Upper Glacial Aquifer. The Proposed Action would also reduce the risk of contamination of public water supply wells that draw from the Magothy Aquifer.

During operation of the project, groundwater could potentially be temporarily affected during a sewage pipe leak or break. Temporary dewatering may be necessary to reach the pipe for repair. Excavation dewatering for the pipe repair would adhere to BMPs for water management and to all applicable local, state, and federal regulations. Public water supply wells would not be affected because they draw from the deeper Magothy Aquifer. As a result, the Proposed Action would not result in significant adverse impacts on ground water.

### **Impact on Flooding**

Construction of the expanded sewer collection and conveyance system would temporarily disturb the ground surface in less than 0.01 acre of the 100-year floodplain in the Connetquot River Expansion Area. Some segments of the sewer collection and conveyance system would be constructed in the floodplain because some of the properties that need to be connected to the WWTP are located in the floodplain, resulting in the temporary ground disturbance. The new

sewer elements would not contribute additional impervious surface because they would be buried underground.

Construction of the sewer mains and laterals through open cut excavation (trenching) or directional drilling, the installation of grinder pumps for the low-pressure sewers, and the use of construction staging areas in floodplains would result in short-term, adverse impacts on floodplains from soil compaction, vegetation and soil disturbance, and degradation of floodplain functions. Compliance with a General Permit for Stormwater Discharges from Construction Activity would include implementation of BMPs, stormwater management techniques, and sediment and erosion control plans that would minimize these temporary, adverse impacts on floodplains. The new sewer infrastructure would be buried underground and would be protected from flood damages. Temporarily disturbed floodplain areas would be returned to pre-construction conditions to avoid long-term impacts. Long-term benefits to floodplains would occur from reduction in pollutant-caused degradation and a decrease in the risks from flood loss and impacts of floods on human life and property would result in indirect, long-term, beneficial effects on floodplains. The proposed project would not affect floodplain values. Therefore, the Proposed Action would not result in significant adverse impacts on flooding.

### **Impact on Air**

During construction, short-term, temporary emissions of pollutants that include carbon monoxide, PM<sub>2.5</sub>, PM<sub>10</sub>, and ozone precursors from mobile equipment, including jackhammers to break pavement, excavators or backhoes to dig the trenches, small cranes or backhoes to lower piping into the trench, and trucks and paving machines to repave the roadway. However, these construction equipment and activity-related emissions would be well below the general conformity *de minimis* thresholds. Additionally, emissions would be controlled through the implementation of standard construction BMPs, including covering haul trucks and soil piles, restoring/replanting areas where vegetation is disturbed to prevent erosion and dust, and limiting idling to five minutes or less in accordance with NYS regulations (6 New York Codes, Rules and Regulations [NYCRR] Subpart 217-3). As a result, impacts on air quality during project operation would be short-term and negligible. Operationally, the gravity sewer option would include two pump stations in the Carlls River Expansion Area, each operating a 25-HP pump 6 hours per day and equipped with emergency backup generators, and up to 20 grinder pumps on individual properties within the Connetquot River Expansion Area. If an exclusively low-pressure option were selected, 3,262 grinder pumps would be installed on individual properties (all within the Carlls River and Connetquot Expansion Areas), and each of the properties in the Carlls River Expansion Area (2,797) would be equipped with backup generators. Emissions from backup power sources would only occur in emergencies/power outages and for periodic testing, and they would result in emissions well below the general conformity *de minimis* thresholds.

Petroleum fuels would be used by emergency generators at the pump stations for periodic testing and during power outages, as well as for the emergency generators for grinder pump generators during power outages. The use of generators, assuming a mixed gravity and low-pressure option, would result in 209.70 metric tons of CO<sub>2e</sub> per year, and the use of generators assuming an exclusively low-pressure option would result in 411.06 metric tons of CO<sub>2e</sub> per year. EPA's eGRID database of electric utility greenhouse gas-intensity shows that the Long Island subregion generates approximately 1,237.3 pounds of CO<sub>2e</sub> per megawatt hour (EPA 2017b). Depending

on the ultimate configuration of gravity- and low-pressure sewers, the Proposed Action would consume approximately 15.978 to 16.538 gigawatt hours of electricity per year, which would result in between approximately 8,967.75 and 9,229.79 metric tons of CO<sub>2e</sub> per year. Electricity consumption, and associated greenhouse gas emissions, would be lower under the exclusively low-pressure option. The Proposed Action would result in a net greenhouse gas emissions increase of between 7,965.00 and 8,480.60 metric tons of CO<sub>2e</sub> per year. The increase in emissions would have a long-term, minor impact on global greenhouse gas emissions. Therefore, no significant adverse impacts on air quality are anticipated as a result of the Proposed Action.

### **Impact on Plants and Animals**

Short-term adverse impacts on vegetation would occur from construction. Impacts would be limited to temporary disturbance of residential landscape properties during installation of service laterals and OWTS abandonments. Impacts on vegetation would be mitigated by routing during the design to avoid and minimize impacts on vegetation, revegetation or re-landscaping with native species following construction and incorporating BMPs to avoid the spread or introduction of invasive plants. Once operational, this alternative would have a long-term, beneficial effect on the health of vegetation by preventing sanitary wastewater overflow during future flood events.

Within the Carlls River Expansion Area, the construction of the two proposed pump stations required for the gravity system would permanently remove approximately 0.2 acre of upland trees adjacent to residences and roadways (approximately 0.17 acre at the Brook Avenue and Jefferson Avenue pump station location and approximately 0.05 acre at the Eddie Avenue and Skidmore Road pump station location). There would be no impacts on the significant natural community (red maple-blackgum swamp) present within the project area. Vegetated areas temporarily disturbed during trenching or to dig jack pits would be restored with topsoil and native grass seed.

Within the Connetquot River Expansion Area, construction of the proposed easement along the western project boundary would result in the permanent removal of approximately 1.7 acres of upland forest. Following construction, the easement would be revegetated with native grass seed, but trees would not be replaced because tree roots can be destructive to the sewer infrastructure, and their presence would preclude future maintenance along the easement. There would be no effect on the significant natural community (coastal oak-hickory forest) present southwest of the project area. Residential landscaped properties, predominately manicured lawns, would be temporarily disturbed during construction activities associated with OWTS abandonments and service lateral connections; however, any disturbed ground surface would be re-landscaped following construction using native species similar to pre-construction conditions. If trees along streets or residences need to be removed, native tree species would be replanted.

Impacts on vegetation would be further minimized by avoidance, revegetation or re-landscaping with native species following construction, and incorporating BMPs to avoid the spread or introduction of invasive plants. Trees would be removed outside the migratory bird breeding season, which occurs between April 1 and August 31, to minimize potential impacts on migratory bird species. Once operational, this alternative would have a long-term, beneficial effect on the health of vegetation by preventing sanitary wastewater overflow during future flood events that

may affect vegetation within and downstream of the project area.

Overall, both gravity and low-pressure system options would have short-term, negligible, adverse impacts on wildlife in the project area during construction, and operation could have a beneficial effect on nearby wildlife and fish habitat from reduced pollution in adjacent waterways. Installation of the gravity system option would have a long-term, minor, adverse impact on northern long-eared bat. Mitigation measures would require that all tree removal activities occur from November 1 to March 31, outside the roosting season, when northern long-eared bats are hibernating in caves and mines located outside the project area. Short-term noise and construction activity impacts would be negligible with the implementation of the mitigation measures. Therefore, tree removal activities are unlikely to affect the northern long-eared bat and would avoid any incidental take. Any tree removal required along street corridors would be minimal, and no effects on northern long-eared bats are expected because these trees would be in areas of human disturbance. During consultation with USFWS, FEMA will submit a northern long-eared bat 4(d) rule streamlined consultation form to USFWS pursuant to USFWS's January 5, 2016, Intra-Service Programmatic Biological Opinion on the final 4(d) rule for the northern long-eared bat. Construction of this alternative would have no effect on any other federally threatened and endangered species because the remainder of the proposed construction activity would be localized to developed areas that do not provide suitable habitat for these species. The low-pressure system would have no adverse impact on any threatened or endangered species. Both options could have beneficial effects on nearby threatened and endangered species habitats. Therefore, the Proposed Action would not result in significant adverse impacts on plants and animals.

### **Impact on Historic and Archaeological Resources**

The Proposed Action would have no effect on architectural resources because there are no historic structures in the project area. On February 13, 2018, the New York State Historic Preservation Office concurred with FEMA's determination that the Proposed Action would have no adverse effects on historic properties and architectural resources, and that Phase IB subsurface archaeological testing may be necessary for areas of archaeological sensitivity that would be disturbed (see attached correspondence). An archaeological survey of three locations in the Carlls River Expansion Area would be conducted prior to any ground-disturbing activities (intersection of Jefferson Avenue and Brook Avenue; between Wyandanch Avenue/August Road and the cul-de-sac of West 24th Street; between the end of Zack Street and Belmont Avenue). In addition, the construction contractor would be required to prepare and implement a plan for unanticipated discoveries. With the incorporation of these avoidance and mitigation measures, no significant adverse impacts to archaeological resources are anticipated as a result of the Proposed Action.

### **Impact on Transportation**

Construction would begin in 2019 and is expected to take between 1.5 and 3 years to complete. New construction would extend the existing interceptor line under Southern State Parkway using low-impact pipe jacking to connect the new system to SSD #3 and ultimately to the Bergen Point WWTP. A small increase in construction traffic could minimally affect major roadways such as the Southern State Parkway, Sunrise Highway, and Montauk Highway. Short-term transportation

impacts would be associated with road closures and low volumes of traffic generated on the surrounding roadways as construction worker vehicles and their equipment drive to the sites. However, these construction-related traffic impacts would be localized and temporary. For the SSD #3 Laterals Area, two or more service lateral connections would be made each day. If all properties along an entire street needed to be connected, then multiple crews would likely be involved and traffic impacts from construction activities on the street would last several days. For Carlls River and Connetquot Expansion Area, installing sewer lines would occur at a rate of approximately 200-feet per day. With typical residential blocks being 600-800 feet long, traffic impacts would only last approximately 3 to 4 days in a given area. Overall, the Proposed Action would not result in significant adverse impacts on transportation.



## Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ROSE HARVEY  
Commissioner

February 13, 2018

Brock Giordano  
Federal Emergency Management Agency, Region II  
26 Federal Plaza, Suite 1307  
New York, NY 10278

Re: FEMA/ DHSES/ NYSEFC/ ESDC  
Carlls River & Connetquot River Watersheds and Southwest Sewer District No. 3 Sewer  
Project.  
Towns of Babylon and Islip/ Suffolk County  
15PR01797

Dear Mr. Giordano:

Thank you for continuing to request the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the materials submitted Jan. 18, 2018 in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/ Cultural resources. They do not include other 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 National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

Above-ground architecture: Based on this review, the SHPO concurs with your agency's determination that the proposed undertaking will have No Adverse Effect to Historic Properties listed in the State & National Register of Historic Places, with the following condition: For eligible properties or properties within an eligible historic district; replace any landscaping elements such as walls, fences and mature trees in-kind (match existing) that is disturbed by the undertakings.

Archaeology: we concur with the conclusions and recommendations outlined in FEMA's 01/18/2018 letter. Phase IB subsurface archaeological testing may be necessary for select portions of the proposed work.

If I can be of further assistance, contact me at (518) 268-2187 [Larry.moss@parks.ny.gov](mailto:Larry.moss@parks.ny.gov)

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### Division for Historic Preservation

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [www.nysparks.com](http://www.nysparks.com)

Sincerely,

A handwritten signature in black ink that reads "L Moss". The signature is written in a cursive style with a large, stylized "L" and "M".

Larry K Moss, Historic Preservation Technical Specialist

CC: Rick Lord, DHSES  
Ben Wright, Suffolk County  
Camilla Deiber, Berger  
Mary Barthelme, GOSR