APPENDIX B
WRITTEN COMMENTS AND CORRESPONDENCE

July 23, 2026 — September 25, 2026

APPENDIX B-1
WRITTEN COMMENTS AND CORRESPONDENCE

Involved and Interested Agencies and Public Officials,
July 23, 2026 through September 25, 2026

NPV

NEW YORK STATE | Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

RICHARD B. CAUSIN, P.E.
Regional Director

August 7, 2026

Mr. Joseph M. Pokorny, P.E.
Deputy CEO for Operations
Suffolk County Water Authority
P.O. Box 38
4060 Sunrise Highway
Oakdale, NY 11769

Dear Mr. Pokorny:

Thank you for the Suffolk County Water Authority's July 23, 2026, Notice of Acceptance of the Draft Environmental Impact Statement to the New York State Department of Transportation (NYSDOT), regarding the SCWA North Fork Water Main Extension from Riverside-Flanders to Riverhead-Southold Town Line and East Marion to Orient.

WDOT-1
Section 2.4

As stated in NYSDOT's previous SEQRA correspondence for this project, all utility installations within State Right-of-Way shall be performed using trenchless methods. For NYSDOT to allow placement of utilities with open trenching, justification as to why the trenchless methods are not feasible will need to be accepted. NYSDOT will review the justification and detailed engineering plans as part of the NYSDOT Highway Work Permit application.

For more information regarding the Highway Work Permit process, please contact NYSDOT's Permit Section Manager, Mr. Olu Fajolu at 631-952-6022 or Olumuyiwa.Fajolu@dot.ny.gov.

Thank you for bringing this matter to our attention.

Sincerely,

M.T. VIJAYENDRAN, P.E.
Regional Traffic Engineer

TOWN OF RIVERHEAD
Office of the Town Attorney
4 WEST SECOND STREET, RIVERHEAD, NEW YORK 11901
Tel: (631) 727-3200 Fax: (631) 727-6152

Erik C. Howard, *Town Attorney* – Ext. 378

Annemarie Prudenti	Danielle Hurley	Victoria Pilo
Deputy Town Attorney	*Deputy Town Attorney*	*Deputy Town Attorney*
Ext. 608	Ext. 216	Ext. 605

August 13, 2026

VIA CERTIFIED MAIL, RETURN RECEIPT REQUEST
& EMAIL Jeff.Szabo@SCWA.com

Suffolk County Water Authority
4060 Sunrise Highway
Oakdale, New York 11769

Attention: Jeffrey W. Szabo, CEO

Re: Document request

Dear CEO Szabo:

Please accept this letter as a formal request pursuant to 6 NYCRR 617.12(b)(1) for a copy of the DEIS and all attachments and appendages for purposes of filing with Town Clerk with the intention to provide ease of accessibility and review to Town Officials, Town Staff and of course and importantly, residents and such other members of the public as may be interested in review of same. In addition, the Town requests copies of the following: SEQRA Positive Declaration; Notice of Completion of EIS; proof of filing of the SEQRA notices and documents be provided to the chief executive officer of the political subdivision in which the action will be principally located (in this matter, the Town of Riverhead); Notice of Hearing relative to the North Fork Transmission Line; Environmental News Bulletin posting, together with proof of satisfaction of publishing requirements related to the above and required pursuant to 6 NYCRR 617.12(c). In addition, the Town requests that Suffolk County Water Authority publish and post on its website the following locations at which the foregoing documents may be accessed and review: Town Hall (Office of Town Clerk, 4 West Main Street, Riverhead, NY Monday through Friday 8:30 am to 4:30 pm) and Riverhead Library during regular business hours.

The Town appreciates your time and attention to the above and looks forward to receipt of the documentation requested above at your earliest convenience.

Thank you.

Yours truly,

Erik C. Howard
Town Attorney

ECH/ko

WEH-1
Section 2.17.1

Glenn Goldsmith, President
. Nicholas Krupski, Vice President
Eric Sepenoski
Liz Gillooly
Joseph Finora

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54375 Route 25
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Fax (631) 765-6641

BOARD OF TOWN TRUSTEES
TOWN OF SOUTHOLD

Dear Suffolk County Water Authority,

The Southold Town Board of Trustees writes regarding the SCWA's proposed project to extend public water service to portions of the North Fork.

The Trustees are not opposed to the overall goal of providing safe, clean drinking water to North Fork residents, particularly in areas where private wells have been affected by contamination. However, we strongly object to any characterization of the Trustees as a "notification-only" board in connection with this project.

The Trustees are the permitting authority for regulated activities occurring within 100 feet of wetlands under our jurisdiction. It appears that portions of the proposed work will fall within this regulated area. Notification is therefore not a substitute for the required application, review, and permitting process. Any work within Trustee jurisdiction must be submitted to the Board so that potential impacts to wetlands, shorelines, and other protected resources can be evaluated and appropriately addressed.

We also believe this project must be accompanied by a broader and more candid discussion about water conservation. Extending public water can address immediate drinking-water needs, but it does not make our underlying water supply unlimited.

As the public authority entrusted with managing and delivering this essential resource, the Suffolk County Water Authority has a responsibility to help residents and municipalities understand the importance of conservation, and help owners identify leaks before millions of gallons of water are lost. Public messaging should not suggest that connecting to public water makes water use limitless or free from environmental consequences. Expanded access should be accompanied by equally visible efforts to reduce consumption.

We urge SCWA to work directly with our local municipalities to develop practical and enforceable water-conservation measures. These should include consideration of tiered metered pricing that keeps ordinary household water use affordable while charging substantially higher rates for consumption exceeding a reasonable threshold. Extending public water service must be accompanied by policies that actively encourage conservation, particularly during periods of peak seasonal demand.

The Trustees are prepared to work constructively with SCWA to provide residents with safe drinking water while protecting the wetlands, shorelines, and groundwater resources upon which the North Fork depends. We respectfully request confirmation that all portions of the project falling within Trustee jurisdiction will be submitted for the appropriate review and permits.

Sincerely,

The Southold Town Board of Trustees

WST-1
Section 2.6.1

WST-2
Section 2.6.1

WST-3
Section 2.6.5

WST-4
Section 2.6.5

WST-5
Section 2.18

ALBERT J. KRUPSKI, JR.
SUPERVISOR

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OFFICE OF THE SUPERVISOR
TOWN OF SOUTHOLD

Comments on the Draft Environmental Impact Statement: Suffolk County Water Authority North Fork Water Main Extensions

Sep 25, 2026

To: Suffolk County Water Authority, 4060 Sunrise Highway, P.O. Box 38, Oakdale, NY 11769-0901 (Lead Agency). Attn: Jeffrey W. Szabo, Chief Executive Officer

Re: Draft Environmental Impact Statement, North Fork Water Main Extensions: Riverside/Flanders to Jamesport/Laurel and East Marion to Orient

From: Albert J. Krupski, Southold Town Supervisor

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the North Fork Water Main Extensions proposed by the Suffolk County Water Authority (SCWA). These comments address a central deficiency: **the DEIS does not meaningfully evaluate water conservation, demand management and added local storage as an alternative to importing water through a new 24-inch transmission main.** The DEIS's own data show that the North Fork's supply problem is not a shortage of water. The supply problem is caused by the early-morning summer peak driven largely by automatic lawn irrigation. That problem can be addressed by reducing and reshaping demand and by storing water, and the DEIS ought to evaluate those options before committing to a $20 million-plus pipeline.

WAK-1
Section 2.12

1. The DEIS dismisses conservation without supporting analyses

SEQRA requires a DEIS to describe and evaluate the range of reasonable alternatives that are feasible given the sponsor's objectives and capabilities, at a level of detail sufficient to allow a comparative assessment (6 NYCRR 617.9(b)(5)(v)). The regulation expressly contemplates alternatives of technology, scale or magnitude, timing, and type of action.

The DEIS does not meet that standard for evaluating conservation measures.

- Section 5 (Alternatives) evaluates only the No-Action alternative and pipeline routes: the Proposed Action, the Preferred Alternative along Main Road, and a previously planned route eliminated during preliminary review (DEIS pp. 5-1 to 5-5).

- Appendix B addresses conservation in Section X.E (pp. 71-72). That section lists five measures, then dismisses them by stating that conservation's "impact on North Fork consumption has shown to be limited," and "the projections for new connections are such that conservation will not be sufficient to offset the increased demand." The DEIS condenses this to one sentence: "conservation alone will not fulfill the need and achieve the goals and objectives of the project" (p. S-13).
- The DEIS does not provide any quantified scenario to estimate how much peak demand or annual volume has been and could be reduced by irrigation restrictions, pricing, smart controllers, leak reduction or conditions on new connections. Without those numbers, the conclusion that conservation "will not fulfill the need" is an assertion, not an analysis.

WAK-2
Section 2.16.4

Also, new-connection projections assume every new service irrigates at the 2024 rate. This assumption ignores the Southold Town irrigation law enacted on July 22, 2025, which requires, among other things, smart sensors and odd/even alternating watering days, as well the ability to halt lawn irrigation during severe drought conditions.

Conservation also need not stand "alone" to be a reasonable alternative. A combined conservation-and-storage alternative is a legitimate alternative of scale and timing that the DEIS does not fully consider.

2. The DEIS's own data show the shortfall is caused by a peak in lawn-irrigation

WAK-3
Section 2.16.4

Appendix B (Hydrogeologic Analysis and Route Evaluation, June 2026) documents the following:

- **Off-peak demand is not a problem.** "The Southold system is easily capable of providing this normal off-peak demand" (App. B, p. 24). In a typical November period, "only a fraction of wells and boosters are operating" (p. 27).
- **Peak demand is two and a half times average.** In 2024, average-day production was 4.101 million gallons; peak-day production was 10.186 million gallons (Table 4, p. 33).
- **The peak falls in the middle of the night.** The 2024 peak five-hour window ran from 2:00 to 7:00 AM (Table 4). Household use (showering, cooking, laundry) is minimal between 2:00 and 5:00 AM. What runs then is automatic irrigation. The DEIS confirms this: the morning peak is "the time that automatic irrigation systems are typically running," and demand varies by day of the week because "most automatic irrigation systems are set to operate on a Monday-Wednesday-Friday schedule," with Monday the highest (App. B, p. 28).
- **The 2024 shortfall was relatively small**. On the 2024 peak day, wells and boosters supplied 11,696 gpm, and the Moores Lane elevated tank supplied the balance, at up to 700 gpm, for a net storage loss of 0.139 million gallons over the five-hour peak (Table 4, pp. 33–34). The shortfall behind Appendix B's conclusion that the system is

WAK-4
Section 2.16.4

"stretched to its maximum capacity during peak periods" (p. 34) was therefore about 5.6% of peak demand, confined to the early-morning irrigation window. We recognize SCWA's concern that the system has no margin if a well or booster fails at that hour. But a deficit of this size is precisely the kind that a modest reduction or rescheduling of early-morning irrigation, or additional storage, could address. The DEIS should quantify how much margin these measures would restore.

Looking forward, Appendix B projects peak demand rising from 12,396 gpm in 2024 to 13,238 gpm in 2030 and 16,569 gpm in 2050 (Table 5, p. 36). It also proposes shutting down 8 chloride-affected wells and curtailing 9 others, removing 1,350 gpm of peak capacity (Table 7, pp. 41–42). On the 2024 peak day, all wells and boosters together supplied 11,696 gpm, and the Moores Lane elevated tank made up the remaining 700 gpm (Table 4, pp. 33–34). Once those wells are retired, the remaining wells and boosters could supply about 10,350 gpm at peak. That leaves a projected shortfall of about 2,900 gpm in 2030 (13,238 – 10,350) and about 6,200 gpm in 2050 (16,569 – 10,350).

Compare that to the summer peak increment. The 2024 average-day rate (4.101 MGD) is about 2,850 gpm; the 2024 peak was 12,396 gpm, so roughly 9,500 gpm of peak-window demand sits above the average-day rate. Appendix B attributes that early-morning peak to "the peak in domestic use together with the irrigation demand," with automatic irrigation systems running on a Monday-Wednesday-Friday schedule (p. 28). Measured against 2024 well and booster supply (11,696 gpm) less the 1,350 gpm from wells to be retired, the projected shortfall is about 2,900 gpm in 2030 and 6,200 gpm in 2050 (Tables 4, 5 and 7), roughly 30% and 65% of that increment. The DEIS never estimates how much of the increment is irrigation, or how much water savings could be gained through restrictions, pricing, smart controllers or added storage.

WAK-5
Section 2.6.5

3. The demand projections assume no conservation at all

The projections in Tables 5 and 6 build in continued high irrigation use:

- **They predate Southold's irrigation code.** The projections use calendar year 2024 as the baseline (App. B, p. 32). Southold Town adopted a new irrigation code in July, 2025. The DEIS neither accounts for the code's effect nor provides post-code data, even though 2025 data existed and the DEIS states that 2025 peak data "had not yet been calculated." The FEIS should use post-code data.
- **Every new customer is assumed to irrigate like today's customers.** Southold Town adopted a new irrigation code in July, 2025. The DEIS does not account for the code's potential effect, nor does it quantify the SCWA's own conservation efforts. The projection multiplies each of 113 new connections per year by the 2024 peak factor of 1.27 gpm per service (p. 35). Taking into account the newest regulations could lower that factor.

- **SCWA's own conservation results go unused.** Section 2.2 of the DEIS includes Water Wise credit data for 2016 to 2025 (Tables 2-10 and 2-11), and Appendix B describes the 2016 three-point program aimed at "excessive peak-season irrigation demand" (p. 15). The DEIS does not use this history to estimate what stronger or mandatory measures would achieve.
- **Water hauled to Shelter Island is not accounted for.** We understand that water haulers serving Shelter Island fill tanker trucks on the North Fork. The DEIS does not identify the timing or quantify these withdrawals. Because Appendix B bases its demand projections on total pumpage per connection (p. 38), any water drawn from SCWA's system is either counted as North Fork demand or in the 8% classified as "lost and unaccounted for." The DEIS should disclose these withdrawals and evaluate how they can be managed.

4. The DEIS relies on conservation as mitigation but will not evaluate it as an alternative

The five measures Appendix B rejects as an alternative (pp. 71-72) reappear in the DEIS as mitigation for the pipeline: mandatory odd-even lawn watering enforced by local jurisdictions, a multi-tiered rate structure, pressure-reducing valves on irrigation lines, "smart" irrigation controllers, and encouraging private wells for lawn irrigation (DEIS pp. S-30, 2-84). If these measures are effective enough to count on as mitigation, they are effective enough to be evaluated as an alternative, and the DEIS must say how much demand they would remove.

WAK-6
Section 2.6.5

We also note that "encouraging the use of private wells for lawn irrigation" would draw from the same thin Upper Glacial aquifer the project claims to protect. It shifts the withdrawal rather than reducing it and should is not necessarily a conservation measure.

The EIS should evaluate, with quantified savings, the following:

1. Enforceable time-of-day and day-of-week limits on potable-water irrigation, including prohibiting or staggering automatic irrigation during the 2:00 to 7:00 AM peak window and ending the Monday-Wednesday-Friday clustering.
2. Seasonal or steeply tiered pricing for high summer use. The DEIS notes the standard retail rate of $2.57 and the conservation rate of $3.71 per 1,000 gallons (App. B, p. 20; DEIS p. 2-48); it should assess whether stronger price signals would reduce peak irrigation.
3. Mandatory weather-based or soil-moisture controllers and rain sensors for in-ground systems, with rebates.
4. Conditions on new service connections limiting potable-water irrigation.
5. Turf-reduction and native-landscaping incentives.
6. Leak detection, meter replacement and loss reduction targeting the 8% unaccounted-for water.

5. Additional storage could meet the peak

Appendix B rejects additional storage because "of the lack of a reliable source of additional water" (pp. 70–71), stating that "storage tanks without the necessary, unconstrained wells to fill them are useless" (p. 30). Appendix B's own figures do not support that conclusion without further analysis.

- The wells have off-peak capacity even on the peak day. On July 8, 2024, wells alone delivered about 9,400 gpm during the five-hour peak, but averaged about 6,000 gpm over the remaining 19 hours (Table 4, excluding booster output from ground storage). On ordinary summer days and in the off-season, the margin is larger. We recognize that several wells are restricted for chloride management (Table 4); that is exactly why the DEIS should calculate how much off-peak refill the unrestricted wells can safely provide, rather than dismiss storage without numbers.

  In addition, Southold's analysis of SCWA's own data shows that many chloride-impacted wells are located in close proximity to road recharge basins. This indicates a strong possibility that those wells are impacted by road salt, and so working with highway maintenance agencies to reduce salt quantities when treating roads for ice may help improve the water quality.

- The storage needed is modest. Covering the projected peak shortfall of about 2,900 gpm in 2030 and 6,200 gpm in 2050 over a five-hour window would require about 0.9 and 1.9 million gallons of storage. The system already has 2.8 million gallons (Table 2, p. 26).

- Steadier pumping is gentler on the aquifer. Appendix B explains that saltwater upconing occurs "under summer season pumping stresses" when every well runs at once (pp. 16, 25). Storage lets SCWA meet the peak with lower, steadier pumping spread across the day. Paired with conservation, total annual withdrawals need not increase.

- Storage directly serves fire protection. A central concern in Appendix B is low tank levels on summer mornings, leaving too little water for firefighting (pp. 4, 28–29, 34). Storage distributed at several local sites addresses that concern directly and adds redundancy, rather than relying on a single 7-mile transmission main.

- SCWA already accepts that storage works. Appendix B says the Rocky Point Road ground storage tank, filled off-peak, "allows for lower pumping rates for area wells, which minimizes potential upconing"; its boosters supplied 658 gpm during the 2024 peak window (pp. 70–71). Appendix B also lists "increases in system storage capacity" among future improvements (p. 6), credits "the construction of additional storage facilities" with sustaining operations (p. 43), and anticipates adding storage

WAK-7
Section 2.6.5

WAK-8
Section 2.6.5

WAK-9
Section 2.6.5

after 2050 as one of the "traditional engineering methods of meeting peak demand" (p. 37).

The DEIS should explain, with a quantified tank-sizing, refill and well-pumping analysis, why additional storage combined with conservation cannot meet the need.

6. The DEIS ignores reuse of Greenport's treated wastewater

The DEIS and Appendix B do not address the Village of Greenport Sewage Treatment Plant. The plant discharges treated effluent to Long Island Sound under a permit allowing up to 0.65 million gallons per day (NYSDEC SPDES Permit NY0020079). The Village has identified about 300,000 gallons per day of that effluent as available for reuse. That is roughly 110 million gallons a year, nearly twice the 60.7 million gallons of production the project would replace by retiring chloride-affected wells (App. B, p. 42).

The option has already been studied. A 2022 study by H2M, commissioned by the Village with a state grant, recommended groundwater recharge basins on the Polo Grounds near Moore's Lane, at an estimated cost of more than $5 million. Irrigation reuse at Island's End Golf Course and Peconic Landing had also been proposed.

Water conservation means more than reducing demand. It also means not discarding water the North Fork already has. Every day, treated wastewater that could replenish the aquifer or replace groundwater used for irrigation is piped into the Sound. Appendix B justifies the new pipeline as a way to protect the thin North Fork aquifer from over-pumping and saltwater intrusion. Recharging treated effluent locally helps to serve that same goal without importing water, and it also removes nitrogen from the Sound. Any evaluation of conservation should include this option.

WAK-10
Section 2.12

8. The DEIS should incorporate current USGS findings on the North Fork aquifer

The U.S. Geological Survey, working with NYSDEC, is studying the North Fork aquifer, including its vulnerability to saltwater intrusion. The DEIS does not use this work, although the Final Scope called for "applicable available USGS reports" (p. 15). The need for the main depends on how much water the aquifer can safely supply, and so does the viability of conservation, storage and recharge. SCWA should obtain the USGS results before making a final decision.

9. Requested actions

We ask that SCWA:

1. Prepare and circulate a supplemental DEIS that includes a full **Conservation and Storage Alternative**, evaluated with the same level of detail as the route alternatives, and open a new public comment period on it. Adding this analysis only

in the Final EIS would deny the public any chance to comment on the most important alternative to the project.

2. Quantify achievable reductions in peak-hour and annual demand from each measure listed in Section 4 above, using SCWA's Water Wise data and post-2025 data reflecting Southold's irrigation code.
3. Provide a storage analysis showing tank sizes, refill schedules and well-pumping rates needed to meet projected peaks with and without conservation.
4. Evaluate combined alternatives of reduced scale or deferred timing, such as conservation and storage now, with a smaller or later main only if monitored demand shows it is needed.
5. Revise the demand projections in Tables 5 and 6 to include conservation scenarios instead of assuming current irrigation practices continue unchanged through 2050.
6. Support with data, or withdraw, Appendix B's statement that conservation's impact on North Fork consumption "has shown to be limited" (p. 72), and reconcile it with the DEIS statement that SCWA's programs have "measurably reduced consumption" (p. 2-57).
7. Include reuse and recharge of Greenport's treated wastewater, including the basins recommended in the Village's 2022 H2M study, in the evaluation of conservation measures, and quantify its effect on aquifer levels and groundwater withdrawals.
8. Disclose monthly bulk and tanker withdrawals from the Southold Low pressure zone for the past five years, including water taken to Shelter Island, and state whether they are included in the demand projections.
9. Incorporate current USGS findings on the North Fork aquifer in a supplemental DEIS, and defer a final decision until they are available.

The North Fork's water supply is adequate for its residents' ordinary needs. Appendix B states that the system "is easily capable of providing this normal off-peak demand" (p. 24). The strain arises during a few early-morning hours each summer, driven in substantial part by automatic lawn irrigation. The North Fork aquifer is a shared public resource on which every resident, farm and business depends. Each gallon used on lawns, or discharged to Long Island Sound as treated wastewater, is lost to all, and all will bear the cost of replacing it. Conservation, storage and water reuse offer a way to protect that resource at far lower cost than a new transmission main. We respectfully urge SCWA to evaluate these measures fully, with quantified analysis, before committing to the project.

Respectfully submitted,

Albert T. Krupski, Jr.

WAK-11
Section 2.12

WAK-12
Section 2.6.2

WAK-13
Section 2.6.6

TOWN OF SOUTHAMPTON

Department of Land Management
116 HAMPTON ROAD
SOUTHAMPTON, NY 11968

Phone: (631) 702-1800

JANICE SCHERER
TOWN PLANNING AND
DEVELOPMENT ADMINISTRATOR

MARIA Z. MOORE
TOWN SUPERVISOR

September 25, 2026

Suffolk County Water Authority
4060 Sunrise Highway
Oakdale, NY 11769

Re: North Fork Water Main Project
Draft Environmental Impact Statement

Dear Sir or Madam:

The Town of Southampton appreciates the opportunity to review and provide feedback on the Draft Environmental Impact Statement (DEIS) for the proposed North Fork Water Main Project. Based upon staff review and on behalf of the Town Board, we offer the following comments:

1. It is recommended that the project description be revised to clearly note that the proposed water main extension will draw water from thirty-three (33) different wellheads within several townships and villages; thereby ensuring that no one community, and its resources, are disproportionally impacted. Consideration should be given to providing a map identifying the approximate supply zone.

2. We would appreciate confirmation that your application of the Monroe balancing test supersedes the Town's administration of the Municipal Separate Storm Sewer System (MS4) permitting process.

3. The DEIS indicates that the anticipated drawdown at the supply wells is not likely to result in adverse impacts to the baseflow of tidal creeks. However, the document does not identify freshwater wetlands within the zone of influence for the wellheads, categorize their hydrology, and, if groundwater-fed, analyze the potential impacts associated with peak drawdown.

4. To the point above, the Oak Avenue wellhead has several freshwater wetlands within 2,000 feet. While some of these wetlands are likely to be perched systems, some may contain active populations of New York State endangered tiger salamanders (*Ambystoma tigrinum).* Therefore, it is recommended that the FEIS assess any potential impacts to species that may rely on groundwater-fed freshwater bodies/wetlands within the zone of influence of the proposed distribution wells.

5. The FEIS should discuss the anticipated drawdown's potential risk to known contamination plumes (i.e. any potential acceleration or migration) and identify prevention of impacts or mitigation strategies to ensure proper filtration is designed into the project.

WSLM-1
Section 2.6.3

WSLM-2
Section 2.18

WSLM-3
Section 2.6.3

WSLM-4
Section 2.6.4

WSLM-5
Section 2.6.3

6. There appears to be a contradiction between SCWA's claims of regional water abundance and its own operational realities. In July 2026, the same month the DEIS was published, SCWA declared a Stage 1 Water Alert for Southampton, mandating alternate-day lawn watering and prohibiting irrigation between 10 a.m. and 4 p.m. due to record pumping and severe aquifer stress. The FEIS should elaborate on this contradiction and further describe the planned construction of storage facilities (reservoirs or tanks) to serve Southold. The FEIS should also describe the operational times of year when the storage tanks are filled, and how will the SCWA ensure that the drawdown will not create additional water restrictions in Southampton?

WSLM-10
Section 2.11

7. To the point above, the FEIS should include a complete analysis related to the potential for salt-water intrusion, how will it be monitored and contamination of wells prevented?

WSLM-6
Section 2.2.1

8. The FEIS should include typical details on the site plan for the proposed directional drilling, inclusive general entrance/exit pit details, staging areas, filter bag/dewatering weir details, and sediment control measures and assess any related impacts.

9. The FEIS should also include information related to dewatering, including box trench details, maximum pumping rates, and sediment controls for pipe installation.

10. The FEIS should provide details on installation of all proposed sediment controls adjacent to freshwater or tidal wetlands and timing prior to commencement. Who ensures they are installed properly?

WSLM-7
Section 2.2.1

11. The intersection of Flanders Road (State Route 24) and Cross River Drive (County Route 105) is a heavily traversed intersection during the morning and evening commutes throughout the year. To ensure traffic impacts are mitigated, the SCWA should commit to a plan that takes commuter traffic into consideration (e.g. limit work to not take place before 9am or after 3pm and explore night work when the roadways are to be impacted).

WSLM-8
Section 2.6.1

12. In order to further mitigate traffic impacts, the SCWA should commit to providing notification to the Town prior to commencement of work, so that any public service announcements can be posted to the Town's website and other social media accounts.

The Town recognizes that SCWA has invested significant time and resources in developing the project plans and we appreciate your efforts. Thank you for the opportunity to comment. If you have any questions, or if you would like to discuss these comments further, please contact me.

WSLM-9
Section 2.11

Sincerely,

Janice Scherer
Town Planning and Development Administrator

APPENDIX B-2
WRITTEN COMMENTS AND CORRESPONDENCE

General Public and Local Environmental Organizations and Civic Associations, July 23, 2026 through September 25, 2026

Puma, Danielle

From: Suffolk County Water Authority <no-reply@scwa.com>
Sent: Monday, August 10, 2026 12:47 PM
To: Puma, Danielle
Subject: North Fork Main DEIS Comment Submission

Categories: Completed

[You don't often get email from no-reply@scwa.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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First Name: robert
Last Name: bocksel
Address 1: 486 main rd
City: aquebogue
State: ny
Zip Code: 11931
E-mail: robertbocksel@yahoo.com
File Upload: No file uploaded.
Comment: Will the proposed water line run on the North or South side of Main road?

Where will the booster station at the intersection of Main rd and 105 be located?

Specifically, what corner will the booster station be located at (i.e.) North West, South West or North East corner.

My house at 486 Main road is in the Riverhead Township Historical Register. What safeguards are in place to ensure no damage to the Residence.

Thank You
Robert K Bocksel

WRB-1
Section 2.3

Puma, Danielle

From: Suffolk County Water Authority <no-reply@scwa.com>
Sent: Thursday, August 20, 2026 8:18 AM
To: Puma, Danielle
Subject: North Fork Main DEIS Comment Submission

Categories: Completed

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The following form was submitted on the https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fscwa.com&c=E,1,JYhYvY3TJSCwhIG1GxXcB1jU7vRIwlOpAz827qwt8lj2gix8LfpP6Wa1yzfCjGvHVQUxwc7nW18_Onydco8iqwu_ooVsnJieGS_F7TlEX9SVv7UbDRBWXg,,&typo=1 website:

First Name: Rosemary
Last Name: McKinley
Address 1: 820 Pine Neck Rd
City: Southold
State: NY
Zip Code: 11971
E-mail: noonon30@gmail.com
File Upload: No file uploaded.
Comment: I understand that water is a commodity in this area of LI, especially in the summer, because of the influx of the summer population. This has been true for a long time.
I also know that people could conserve water by planting zoysia grass, and not watering lawns on a regular basis. By allowing more commercial properties here, the water demand is also greater. Perhaps, our leaders should curb those permits.

WRM-1
Section 2.1

WRM-2
Section 2.6.5

WRM-3
Section 2.6.5

Puma, Danielle

From: Suffolk County Water Authority <no-reply@scwa.com>
Sent: Saturday, August 22, 2026 2:15 PM
To: Puma, Danielle
Subject: North Fork Main DEIS Comment Submission

Categories: Completed

[You don't often get email from no-reply@scwa.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

CAUTION: This email originated from outside of SCWA. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The following form was submitted on the https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fscwa.com&c=E,1,JxqBF9gu_wQMvAXeuvpLQvUpFOOmgf6WhhIJWX_jKn41nXJ-exY3JfHKy38OOPWr-d8-31RBzzzBoQ2s1bwNPqyes-w3nU8WTDEbZgeJnQMfJvDDgwWoRA,,&typo=1 website:

First Name: Nancy
Last Name: Butkus
Address 1: 655 Town Harbor Lane
City: Southold
State: NY
Zip Code: 11971
E-mail: nancybutkus@gmail.com
File Upload: No file uploaded.
Comment: The majority of properties in my neighborhood are owned by weekenders who only use their houses occasionally on summer weekends. But they all have sprinklers going every night all summer long. I support Greg Doroski‘s plan to have a tiered billing system. I believe that is the only motivation to get people to cut back on their profligate waste of water.

WNB-1
Section 2.6.5

Public Hearing on North Fork Pipeline DEIS
August 26, 2026 - Riverhead Free Library

A change of project during SEQRA is completely acceptable. What is not acceptable is that for almost a year and a half all SEQRA documents, assessment forms, narrative, attachments, Draft and Final Scope, public meetings, ENB notices and the Monroe Tests all pertained to a different action. For almost 1 year and a half, we have been focusing on and discussing the proposed action that could not function without building a second pump station somewhere or a 50% increase in the size of the pipe. The Proposed Action was not suitably designed to adequately meet the goals of the project according to the hydrogeological analysis contained in the DEIS. This change of plan was not a case of "We've heard you"...it's more like, "Oakdale, we have a problem."

WBB-1
Section 2.16.3

WBB-2
Section 2.16.3

The SEQRA record is less than sound. We Scoped a site specific action that doesn't work and commented on impacts located along a

different route. On Page S-14 of the DEIS we read that the proposed action, the Sound Avenue Route, is the "subject of the bulk of this assessment." This begs the question whether this DEIS provides enough accurate, detailed information for a balanced evaluation to support a Findings Statement.

WBB-2
Section 2.16.3

The Main Road route is now the preferred action and while both Sound Avenue and Main Road routes share some of the same impacts, shifting the route changes impact intensity and shifts the location of the impacts into a different setting.

WBB-3
Section 2.16.3

As an Involved Agency, the NYSDOT said in its correspondence that the **original route,** (Sound Avenue) has less impact on the public and traffic. There are significantly more established businesses and residences which will be impacted by the Main Road route. This is not surprising since this route traverses 8 zoning use districts including 5 business districts.

WBB-4
Section 2.16.3

There is no substantive traffic information in this DEIS: no traffic counts, traffic patterns or seasonal fluctuation data for either of the routes. The town has received more detailed traffic information on a 15 lot subdivision than you have provided in this document. You mention traffic safety protocols around the Oysterponds School, (student population of 90) which is noteworthy except that this school is in Orient, and this phase of the project will not be built anytime soon, if at all. There is no specific mention of the Aquebogue Elementary School located directly on the preferred route with an enrollment of close to 450 students. How will construction along Route 25 impact the daily school bus activity to this school and others in the District? Bus stops along the construction zone may not have alternate local roads to utilize. The FEIS fails to adequately discuss this.

WBB-5
Section 2.11

The DEIS contains several references to the SCWA's indisputable immunity from local zoning. Unfortunately, that matter is the subject of litigation brought by the SCWA, the Lead Agency, against the Town of Riverhead and until it is decided by the Court, any statement about the Authority's immunity is premature and speculative. The FEIS must be based on factual not speculative information.

WBB-6
Section 2.18

The issue of immunity is separate and distinct from a SEQRA review. Nevertheless, you have decided to include what is described as the SCWA's Monroe Test determination in the DEIS as Appendix C. The document reads like an official resolution but is on plain white paper, it is undated, and lacks a recorded vote. You have received relevant and pertinent information from the Town of Riverhead regarding its Monroe Balancing Test which comes to a different conclusion. You as Lead Agency made an arbitrary decision to include your resolution in this document and exclude Riverhead's. This action by the Lead Agency is unacceptable and taints the SEQRA record.

WBB-7
Section 2.18

The DEIS describes the protocol for excavating activity within 100 feet of any regulated DEC freshwater wetland or 300 ft of tidal wetlands; Riverhead's wetland jurisdictions are 150' and 350' respectively. The protocol described activities including excavating and staging outside of the DEC regulated wetland areas, to "prevent inadvertent disturbance and ensure effective separation from sensitive wetland resources."

WBB-8
Section 2.6.1

As the Lead Agency and project sponsor, the SCWA cannot hide behind a cloak of Monroe Immunity and ignore potential impacts to portions of existing wetlands because they are within the jurisdiction of the local municipality. The Lead Agency must take the requisite hard look. The FEIS must clearly identify the boundaries of the wetlands and the regulated area according to Chapter 295 of the town Code and seek a permit if any activity is to occur within

Finally, to mitigate noise and reduce vibration impacts, the DEIS describes a specific construction plan within 90' of all listed and eligible historic structures. This mitigation should also be employed in the vicinity of other noise and vibration sensitive ~~structures~~ RECEPTORS such as schools, churches, day care centers, etc.

Thank you for your time and attention.

Barbara Blass

Jamesport, NY

WBB-9
Section 2.10

Good afternoon, for the record., I am Riverhead Town Council Member Kenneth Rothwell.

During the SCWA Monroe Hearings of October 9, 2025, I noted that other than Jeffrey Szabo, CEO of SCWA and SCWA representative attorneys, the full SCWA Board of Directors was absent from the Monroe hearing and questioned the validity of "The SCWA Board of Directors" physically conducting the Monroe Hearing.

There was no SCWA Board quorum present at the Hearings, nevertheless the Board/Lead Agency somehow passed a SCWA Resolution finding itself immune from all local municipal land use regulations.

What I stated – and this is included in SCWA transcript was.

> *"To witness the lack of attendance and participation by the Suffolk County Water Authority Board requires me to question and ask under what and whose authority is the purported Monroe Factor taking place. And is this a singular decision or one of the Suffolk County Water Authority that is notable absent,"*
>
> (* I also note from the transcripts pretaped from all three Monroe Hearings hosted by the SCWA, the Board of Directors. Mr. Szabo as SCWA CEO was present).

1. The observation here is that the SCWA Board of Directors (Charles Lefkowitz, Elizabeth Mercado, John Porchia III, John Rose and Willaim Davidson) were noted as all absent. A quorum of the SCWA Board was not present during any of the Monroe Hearings held on October 7, 8 & 9, 2025.

2. It is my understanding; a Monroe Balancing Test Hearing **is an official public proceeding** held by a local government board (such as a town board, a governmental authority or zoning board) to weigh competing public interests and decide if a public project is immune from local zoning rules. That is precisely why a quorum of the Riverhead Town Board was present during its Monroe Balancing Test Public Hearing, as we are at all official proceedings.

3. I also note: **an authority's board cannot allow other employees to hold or execute official board proceedings without a board quorum present. Without a quorum, a governing body lacks the legal authority to transact business, hold formal hearings, or pass binding resolutions.**

4. **Any official decisions, votes, or formal proceedings undertaken without a quorum are legally invalid.**

5. **While a board can delegate day-to-day administrative tasks or fact-finding to staff or committees, the core official proceedings and final binding actions of the board itself require a valid quorum to initiate or ratify.** In the absence of a quorum, attendees can only fix the time to adjourn, adjourn, recess, or take steps to gather a quorum.

WKR-1
Section 2.18

Based on observations and research, the SCWA Monroe Test appears to be a severely flawed process and therefore not legally binding.

As an elected representative of all the people in Riverhead, it is my responsibility and the duties of all my colleagues and elected officials to preserve and protect the public and environmental welfare and safety of the Town. I do not support the SCWA's Monroe Test outcome and find no reasons why the Authority would so strongly resist compliance with our land use regulations, which are designed to protect the public and our natural resources.

Furthermore, SCWA as Lead Agency, specifically identified the Monroe Balancing Test as within its SEQRA review and DEIS preparation (rather than separating the two proceedings and reviews as typically recommended). If the SCWA Monroe Test was seriously flawed or unlawful, then only Riverhead's Monroe Test should be presented in the DEIS as a factual.

Thank You.

WKR-1
Section 2.18

Jeffrey L. Seeman, CEP
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August 26, 2026

Suffolk County Water Authority- SEQRA Lead Agency
4060 Sunrise Highway, PO Box 38
Oakdale, NY 11769-0901

RE: Comments: SCWA North Fork Water Main Project DEIS

WJS-1
Section 2.22

General DEIS Overview:

1. The "online" version of the DEIS was released for public comments on Friday July 24, 2026. The text of the DEIS is more than 300 pages and considering the appendix, figures and maps these documents have likely exceeded 1000 pages. It is difficult and cumbersome to close out the (PDF) text version to review the (PDF) maps, figures and references in the appendix and then shift back to the text. This makes review burdensome and time consuming, even with multiple computers.

WJS-2
Section 2.22

2. The DEIS can be described as the combination of a routing selection study and in the format of a generic environmental impact statement (GEIS) rather than a detailed Site Specific DEIS. The document reference information includes various maps, plans and figures. However, each of these references are presented in different scales.

   For example, The NYSDEC Wetland Maps included under the Proposed Action and Preferred Alternative are scaled at 1"= 2,000-ft.; the list of Aerial Map Figures in the DEIS are at 1" =800-ft.; the Booster Station site layout proposed at Rt 25Rt 105 is at a scale of 1"= 80-ft. (for some reason this Booster Station in the DEIS is classified as a Type 2 Action- and noting Zoning Compliance as "N/A" in Appendix J- this would be segmenting the SEQRA review) and the proposed water main preliminary location plans are 1"=50 ft. For EIS level work- the most accurate scale (1" = 50-ft.) should be used especially to assess sensitive project impacts (wetlands, adjacent properties, archeological sites, etc.).

   Additionally, significant ecological resources (wetlands, surface waters, historical sites, etc.) are not depicted on the preliminary engineering (1" = 50-ft.) drawings making it unclear how the proximity of these environmental resources might be impacted. Due to this wide diversity in scale and accuracy; it is like looking through a telescope with one eye and a microscope with the other.

WJS-3
Section 2.17.1

   At a minimum the potential for impacts upon sensitive environmental areas should be presented as figures and plans at the best available and accurate scale available such as 1"=50-ft. and clearly shown on the figures. Other than the Riverhead Water District's

infrastructure, no other existing utilities (gas, electric, telecommunications) are clearly depicted in the DEIS figures and plans. The Preferred Alternative plan sheets (Attachment 2) include a dashed line labeled "G" which one can assume is gas, however there is no ownership identified for the "G" line given or plan legend provided to confirm the labeling. No edge of pavement, curbs, sidewalks, property boundaries, ownership identifications, elevations or other survey/topographic information is depicted on the plans.

WJS-3
Section 2.17.1

The DEIS focus is primarily on a comparative analysis of the Proposed Action (the original Sound Avenue Route and Pier Avenue Booster Pump Station) potential impacts and mitigation against the Preferred Action (NY Rt 25 Route and Rt 25/Rt 105 Booster Pump Station) and its potential impacts and mitigating measures. Another focus of the DEIS is regarding the Monroe Balancing Tests, a process that determines governmental immunity from a municipality's zoning ordinance. The SCWA contends that it is immune from all local municipal zoning and local land use controls (even within all 43 municipalities of Suffolk County). The Riverhead Town Board, as the host municipality for most of the Project, conducted a Monroe Balancing Test with a significantly different conclusion under Resolution 2025-860, dated October 7, 2025, resulting in no immunity from its local Zoning and Land Use Laws, Codes and/or regulations. The Monroe matter is now under litigation. Normally when an Action is undergoing SEQRA review while there is ongoing litigation, the SEQRA process is allowed to continue through to its conclusion, regardless of the outcome of litigation. This avoids unnecessary delays for a Sponsor and the Proposed Action's environmental assessment.

WJS-4
Section 2.12

WJS-5
Section 2.16
Section 2.22

However, the Lead Agency included Monroe in its Final Scope and within its DEIS, connecting inextricably the Monroe Balancing Test with SEQRA. It is improbable that the two can now be segregated, suggesting that until all litigation is finalized by the Courts, the SEQRA record will and must remain open.

WJS-6
Section 2.18

3. The "Preferred Alternative" (re-routing the watermain through Rt 25 instead of Sound Avenue; new Booster Station location at Rt 105/Rt 25 within the Riverhead Rural Corridor Zoning District). The Preferred Alternative Pumping Station is not consistent with Town zoning. A significant reason the Sponsor/Lead Agency has selected the Preferred Alternative is because the Proposed Action (as originally presented) was not able to be successful from the standpoint of hydraulic engineering design evaluation. As presented in the DEIS Appendix B, (Hydrogeologic Analysis & Route Evaluation Report) it was determined a second booster pump station would be required to maintain adequate water pressure and volume if the Proposed Action (Sound Avenue route) is to be viable. The conclusion is based on the loss of pressure needed to pump water up to an elevation change of some 60 feet using one Booster Pump Station proposed at Pier Avenue.

WJS-7
Section 2.9

How was this condition not discovered by SCWA in the early stages of project planning and design? The DEIS states the Sound Avenue route is still "viable." How is the route viable if there is no description or location of the second pump station provided? The DEIS also states, the route selection (Sound Avenue or Rt 25) will be determined at the conclusion of SEQRA once the Findings Statement is prepared. Therefore, both routes remain as options for the water main, and only the no-build and the Peconic Bay Boulevard route have been ruled out.

WJS-8
Section 2.16.1

The Project requires directional drilling 30 feet below the Peconic River bottom. What are the sediment characteristics at 30 feet below the Peconic River? Is this bottom sediment within the marine Pleistocene layer (Gardiners Clay)? Has SCWA conducted sediment sampling to this depth? If not, why? If encountered how will clay formations impact directional drilling, sediment discharges and disposal? Have any upland soil borings been conducted along the two major proposed routes?

On August 19, 2025, Kathleen M. Bennett of Bond, Schoneck & King, PLL prepared a letter which was hand delivered and entered into the Town of Riverhead Monroe Balancing Test Public Hearing records. Said letter is included on the SCWA Northfork Pipeline website under the title "Materials."

WJS-10
Section 2.18

In the letter she states,

> Moreover, SCWA has standardized system facilities to compress review time by Suffolk County OHS and to maximize efficiency and productivity and to speed procurement of materials. If SCWA needed a different set of specifications for each site, then design lags would take place in trying to obtain the local approvals as well as procuring materials for the systems/buildings. Delays of up to one year would also be experienced on the vendor and SCWA sides in the review process as the number of engineering submittals would dramatically increase. Currently, bidders are not faced with a learning curve on every project and manufacturers know what is expected. However, unknown items create risk to bidders and manufacturers and result in higher costs and sometimes in longer time needed as submittals may have to go back and forth numerous times.
>
> SCWA systems are maintained and operated by a limited number of employees that include generalized trades such as field operators, and specialized trades such as electricians and mechanics. Specialized trades must be capable of deploying to any site when needed and generalized trades must be familiar with as large a number of sites as practicable to allow for succession, union bidding, and absences of other field operators.
>
> If different towns were allowed to control the operations, this would effectively put up borders at town/village boundaries. This would effectively defeat the advantages of the pressure zone approach to operating a water system employed by SCWA where hydraulics and water quality govern. One of the chief benefits for SCWA's de-centralized system (with hundreds of wells and well fields) is that the zones are capable of backing up individual wells or even well fields by automatically responding to demands in the system. Adding constraints to this system would decrease system reliability and flexibility. For instance, during a main break or pump failure or water

WJS-9
Section 2.2.1

> quality issue. SCWA's system can rely on other sites and treatment systems to overcome that lack of supply. Constraining our ability to deploy our vast assets limits reliability and could also result in decreased fire protection.
>
> Accordingly, SCWA must be immune from local control in connection with the Project.

From these statements, one would assume that SCWA engineering is experienced and precise to the degree that any added review from municipalities is unnecessary and only causes delays of up to one year. However, in the Northfork Pipeline matter the simple hydraulic analysis of attempting to pump water 60 feet uphill through a 24-inch pipe with a design flow of 6,000 gallons per minute (GPM) through miles of the transmission line and interconnecting distribution mains in Southold (the primary purpose of the entire project) using only a single Booster Pumping Station was somehow overlooked.

Most North Fork farmers can recognize pumping water, over a shorter distance and through fields with little elevation changes is a more efficient and less expensive method of irrigation than pumping water uphill and along long distances. However, the major organization providing potable water within Suffolk County failed to adequately determine pressure loss due to elevation differentials involved in a 30-million-dollar transmission line project which is SCWA's largest construction project in its 75-year history, something a civil engineering student can likely do using routine calculations.

WJS-11
Section 2.3

During past review of the Project, the Riverhead Water District (RWD) staff recognized the location of the proposed Booster Pumping Station at Pier Avenue was not adequate. This observation demonstrates that additional review of SCWA proposed infrastructure by local municipal experts can be helpful to avoid problems with design and construction. The opposite of what Ms. Bennett stated in her August 19, 2025. Letter. SCWA has caused delay in its own making regarding its original schedule for the Project's costs and completion.

If the Proposed Action (Sound Avenue route) needed a second Booster Pumping Station in addition to the one proposed at Pier Avenue, the DEIS identified no proposed location for the second station. Why is this information missing? This is important because the potential Sound Avenue route has not been completely abandoned by the Sponsor.

4. The DEIS does not address the recent announcement published by SCWA on August 6, 2026, regarding partnering with Suffolk County to seek federal and state grants to fund the Mattituck Water Main Extension project to address emerging contaminants found in local private water wells. Is the Mattituck Water Main Extension project to be supplied water from the proposed North Fork Water Main transmission system? This proposed project is within the DEIS study area of Southold and must be identified in the DEIS/FEIS with an analysis of how the Proposed Action and Preferred Alternative will be affected.

WJS-12
Section 2.14

The Riverhead Town officials (and public) were unaware of the <u>significant</u> Preferred Alternative routing change in the Project until the DEIS was released. The earlier DEIS

public Scoping Sessions/Hearings (held in Westhampton, Riverhead and Southold) focused on the Sound Avenue route, few if any issues were raised over impact potential from selecting the alternative along Rt 25. The Final Scope (for the Sound Avenue routing) was issued in November 2025, with SCWA stating a DEIS would be expected in December 2025-January 2026. Certainly, the SCWA realized the selection of Rt 25 was a "Preferred Alternative" over the Proposed Route well before issuing the DEIS on July 24th. The "Engineering Report: The North Fork Water Main Project" was dated June 2026, and the CDM, Smith Memorandum contained in the Report was dated May 21, 2026.

SCWA could have held additional announcements or provided a type of supplemental SEQRA participation process to identify this significant Alternate Routing change and not simply prepared their EIS analyses with a comparison of the Preferred Alternative versus the Proposed Route (Sound Avenue) thereby limiting the public's input to only commenting on the DEIS (with a deadline of September 11, 2026 at 5:00 pm) instead of permitting added public input based on the new route and new Booster Station location. Only substantive comments to the DEIS will be responded to in the FEIS, with no comment period on the FEIS.

How many participants along the Rt 25 route did not become involved in the SEQRA process simply because they believed the watermain and Booster Station would be constructed along Sound Avenue, and the likelihood of the Alternative use of Rt 25 was (as is typical in many EISs) of low probability?

WJS-13
Section 2.16.1

Monroe Balancing Test

5. Monroe Balancing Test: From the onset of the SEQRA process and filing of the Full Environmental Assessment Form (July 2025) SCWA included Monroe Balancing Test as a primary SEQRA issue and for its inclusion in the DEIS. However, the DEIS provides only an overview of the issue with the primary focus on the SCWA's position that it is completely immune from Riverhead's municipal zoning and land use regulations. The DEIS lacks a full description of Riverhead's Monroe Test in the first instance, provides no Appendix containing Riverhead Town Board Resolution 2025-860, offers no recorded testimony or comments from Monroe Hearings stating reasons why the Town Board denied SCWA from any immunity from the Town's land use requirements and its list of eight (8) Town approvals SCWA shall seek for the Proposed Action (either for the Proposed Project and/or the Preferred Alternative as may be determined).

WJS-14
Section 2.18

During the SCWA Monroe Hearings of October 9, 2025, Town Board member Kenneth Rothwell noted that other than Jeffrey Szabo, CEO of SCWA and SCWA representative staff, the full SCWA Board of Directors was absent from the hearings and questioned the validity of "SCWA Board of Directors" physically conducting the Monroe Hearing. According to the transcripts, there was no SCWA Board quorum present at any of the Monroe Hearings, nevertheless the Board/Lead Agency passed a SCWA Resolution finding itself immune from all local municipal land use regulations.

Furthermore, SCWA filed a lawsuit against Riverhead's Monroe determination, which is currently under review by NYS Supreme Court. The outcome of this civil action is

currently unknown, and the case may not be resolved for some time. By the Lead Agency's own decision to include Monroe in the SEQRA review process, rather than separate the Monroe process from SEQRA reviews (as is normally recommended) and first apply Monroe to determine status of immunity before proceeding with SEQRA (to determine local approvals and Involved Agency confirmations) the two (Monroe and SEQRA) are now inextricably connected under SEQRA and cannot be separated.

WJS-15
Section 2.18

Irrespective of ongoing court challenges, and to avoid unnecessary delays, SEQRA typically continues and concludes even while litigation continues. However, because SCWA, as Lead Agency, has combined Monroe within its SEQRA process, it has severely muddied its own waters.

Immunity from Riverhead's land use approvals, is a significant DEIS issue, with underlaying consequences (Site Plan review, Zoning issues, local wetland permit approvals, grading and excavation permits, etc.). Confirmation of the Monroe Test determination is needed for a defensible SEQRA Findings Statement. Until the courts have reached a final decision, this DEIS item remains undetermined.

WJS-16
Section 2.18

One of the nine considerations under the Monroe Balancing Test is, *"Intergovernmental participation in the project development and an opportunity to be heard."* Riverhead's governing body was not informed of this Preferred Alternative until the DEIS was released, albeit the SCWA was informed and apparently supportive of the major routing change. However, as with past requests to coordinate with the host municipality (such as a July 9, 2025, video conference scheduled with Riverhead officials, and throughout the SEQRA Scoping and SCWA Monroe Hearings, SCWA has openly refused to answer questions or directly respond to public comments). SCWA failed to establish any communications regarding the new routing, seek input from the host municipality or the public until after its release of the DEIS.

The Court has requested additional data and presentations of additional information at a hearing date scheduled for September 23, 2026. This hearing may provide additional information regarding the Monroe issue of immunity and should be included in the FEIS.

WJS-17
Section 2.3

The repetitive statements in the DEIS by SCWA that it is "undisputedly immune" from local municipal zoning and land use regulations, is an apparent "thumb on the scale" to favor SCWA's self-imposed immunity. This is not appropriate for a SEQRA document, which is to provide accurate, objective, unbiased information as a "Statement" not as part of a Lead Agency's propaganda campaign. The Lead Agency's DEIS must be cautious about ignoring Riverhead's Monroe analysis and over-emphasizing its own Monroe determination because that could be regarded as arbitrary and capricious.

The Town should continue to support its position that SCWA is not immune from Town Code requirements or agency reviews. It is obvious that without the second Booster Pump Station for the Proposed Action, the project would not achieve its intended goals (because the watermain would not have enough pressure to pump water to Southold). A proposed Rt 105/Rt 25 Booster Pump Station needed for the Preferred Alternative is located in the Rural Corridor Zoning Use District. The Pier Avenue and Rt 105/Rt 25 pump stations

WJS-18
Section 2.12

require a Town Board Special Permit pursuant to Town Code Chapter 301-225B, requires Planning Board review for Site Plan pursuant to Town Code Article LVI-Chapter 301-307, Excavation & Grading Permit pursuant to Town Code Chapter 229 and Building Department approvals. Construction disturbing Town sidewalks, as well as through Riverside Drive, Sound Avenue and Hubbard Avenue (Town roads) require review for permit applications by the Riverhead Superintendent of Highways pursuant to Town Code Article II Alterations and Excavations-Chapter 237. Without municipal reviews, how would the Booster Pump Stations receive a Certificate of Occupancy, or be accurately taxed by the assessors and how would an emergency (fire) be managed without knowing details of the facility? It is a potential risk to public safety.

WJS-15
Section 2.18

The pipeline installation is subject to review and permit approvals by the Riverhead Conservation Advisory Council (CAC) for activities occurring within 150 feet of freshwater wetland boundaries and within 300 feet of tidal wetland boundaries pursuant to Town Code Chapter 295.

WJS-16
Section 2.18

It should be noted that Chapter 295, Chapter 229, and Chapter 237 of the Riverhead Town Code are separate and apart from the Town's Zoning Code, Chapter 301. It is unclear how SCWA can utilize the Monroe Balancing Test, a tool to consider exemptions from local zoning, for regulations which are separate and distinct from the Zoning Code.

WJS-17
Section 2.3

The original proposed route along Sound Avenue had included one Booster Pump Station at Pier Avenue. Appendix B: Final Hydrogeologic Analysis & Route Evaluation Report determined the Sound Avenue route could not be viable without a second Pumping Station. This proposed second pumping station was never identified during the DEIS Scoping Sessions, and it is unclear why SCWA proceeded with multiple hearings without first having conducted sufficient engineering studies for the Project.

WJS-18
Section 2.12

The Town of Riverhead repeatedly requested detailed engineering design information so that its SEQRA input could address issues about the specific location of the pipeline and its supporting infrastructure, and how this infrastructure could impact existing utilities, areas of environmental value, public and private properties. SCWA has advocated its experience in water supply infrastructure and construction should not be impeded by local municipal reviews, however the need for a second pumping station strongly suggests that additional municipal reviews conducted by the Town's qualified experts would likely serve to only improve the Project's outcome, avoid impacts and enforce mitigating measures to the greatest extent practicable.

WJS-19
Section 2.19

Finally, and critically the SCWA Board cannot allow its other employees to hold or execute official board proceedings without a board quorum present. Without a quorum, a governing body lacks the legal authority to transact business, hold formal hearings, or pass binding resolutions.

Official proceedings undertaken without a quorum are legally invalid.

WJS-30
Section 2.13

While a board can delegate day-to-day administrative tasks or fact-finding to staff or committees, the core official proceedings and final binding actions of the board itself require a valid quorum to initiate or ratify.

In the absence of a quorum, attendees can only fix the time to adjourn, adjourn, recess, or take steps to gather a quorum.

A Monroe Balancing Test Hearing is an official public proceeding held by a local government board (such as a town board or zoning board) to weigh competing public interests and decide if a public project is immune from local zoning rules.

6. Within the content of the DEIS SCWA (as Lead Agency) repeatedly stated it is immune from the enforcement of all local municipal codes and approvals. These statements are not accurate. The Monroe Balancing Test conducted by the Riverhead Town Board resulted in Resolution # 2025-860 unanimously passed on October 7, 2025, which determined the SCWA North Fork Project **is not immune** from any of Riverhead's required land use approvals (including site plan, building and fire marshal approvals, inspections, SWPP, excavation & grading, wetlands, etc.). Town Board Resolution # 2025-860 should be included in the text of the DEIS. Although the SCWA has legally challenged Riverhead's Monroe decision, the courts have yet to decide the final outcome. Therefore, the DEIS must be revised to include all the municipal approvals that Riverhead requires.

Wetlands & Surface Waters:

WJS-20
Section 2.18

7. **NYSDEC issued SCWA a General Wetland Permit** (DEIS Appendix G) No. 1-4700-00010/00811, dated April 23, 2025. The permit covers a Tidal Wetland Permit- exp. 4/22/2035, a Freshwater Wetland Permit- exp. 4/22/2035 and a Wild, Scenic & Recreational Rivers Permit-exp. 4/22/20230. Pages 10-11 (simplified sketch plans) do not depict actual wetland delineations relevant to the Project and are generic in nature.

   The Final Scope (October 22, 2025) stated,

   > ***Existing Conditions:*** *(Using appropriate narrative, mapping, tables and quantitative methods where possible, identify all surface waters and wetlands along the route or nearby within applicable agency jurisdictional areas that are nearby (including Peconic River and Estuary, Sawmill Creek, Terrys Creek, LI Sound, Orient Harbor, Dam Pond; Town, USF&WS, and NYSDEC jurisdictional fresh and tidal wetlands; and underwater lands, etc.)*
   >
   > ***Anticipated Impacts:*** *(Using mapping, quantitative and qualitative methods, discuss potential for impact on surface waters, wetlands, underwater lands (e.g., Peconic riverbed directional drill) and potential siltation/sedimentation impacts; discuss any changes in stormwater management, potential impacts and best management practices; discuss impacts on LI Sound, Orient Harbor, and the Peconic River/Estuary if any; identify any impacts or inconsistencies with applicable LWRPs, temporary surface water use impacts*

The DEIS fails to provide detailed informative wetland assessments and make applications to Riverhead's Conservation Advisory Council (CAC), which has jurisdictions within 150 feet of freshwater wetlands and 300 feet of tidal wetlands. NYSDEC regulates activities within 100 feet of freshwater wetlands and within 300 feet of tidal wetlands. Furthermore, no Involved Agency may issue approvals or decisions until SEQRA has concluded.

DEIS: Tables 2-7-A through 2-7-C present an inventory of mapped wetlands identified by the NYSDEC Tidal Wetlands Inventory, NYSDEC Informational Freshwater Wetlands mapping, and the NWI mapping of areas along the proposed water main alignment. These tables are intended for informational purposes only.

WJS-21
Section 2.6.1

The DEIS states,

> *"Additional agency coordination and/or field investigations will be required to confirm the presence, extent, and jurisdictional boundaries of wetlands within the project area."*

This is not acceptable. The DEIS has failed to meet the requirements of the Final Scope because it has not used "quantitative and qualitative methods, discuss potential for impact on surface waters, wetlands, underwater lands (e.g., Peconic riverbed directional drill) and potential siltation/sedimentation impacts."

The DEIS is a site specific not generic assessment, and field delineation of tidal and freshwater wetlands is necessary to evaluate site specific potential impacts and permit requirements. Actual impacts to tidal and freshwater wetlands are therefore unknown, leaving a determination and mitigation to be implemented after SEQRA has concluded.

Revise the DEIS/FEIS to accurately identify potential impacts to wetlands based on actual field delineation of wetland boundaries and the actual distance to the work related to the Proposed Action and Preferred Alternative routes throughout the project study area, where impacts are likely to occur (directional drilling, Saw Mill Creek, Terrys Creek, Rt 25/Church Lane, and the areas south of Aquebogue Vinyards etc.).

In Section 2.1.3 Proposed Mitigation- The DEIS states:

> *"The following mitigation measures are planned for the construction aspects of the project to prevent or minimize potential impacts to and from topography and soils.*
>
> *Identify areas that are near surface waters and wetlands to ensure protection. Set up erosion and sedimentation controls including work area silt fencing where proposed work is within wetlands jurisdictions. Reseed after backfilling and grading along each section of main that is installed. Make sure silt fencing is recessed 6 inches into the ground to prevent underwash and offsite flow of sediment laden runoff."*

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Section 2.6.1

Be advised, work "within wetlands jurisdictions" where the project is within the municipal boundary of the Town of Riverhead jurisdictional wetland boundaries are

defined as within 150 feet of freshwater wetland boundaries and within 300 feet of tidal wetland boundaries. SCWA has no enforcement authority over Riverhead's wetlands.

The proposed work will require permit applications to be filed with the Town of Riverhead Conservation Advisory Council. In Riverhead, SCWA cannot "set up erosion and sediment controls including work area silt fencing where proposed work is within wetlands jurisdictions," without approvals from the Town of Riverhead pursuant to Chapter 295 of the Town Code.

Figures 5,1-3A and 5.1-3B show open trench installations at Saw Mill Creek and Terry Creek, respectively. Sheet 4 of the Plans depicts Saw Mill Creek being less than 25 feet from the proposed pipeline. Furthermore, the 10-foot-wide construction area will most likely impact wetlands within these two waterbodies, as would open trench construction on the surface waters themselves. These issues were raised during the Draft Scope comment period. Explain in detail the method of open trenching at Saw Mill Creek and Terrys Creek, near Meetinhouse Creek-Church Lane/Rt 25 (40 ^{0} 56'48"N - 72 ^{0} 37'09"W) near 822 Main Road (40^{0} 56'54"N - 72^{0}36'53"W) what mitigating measures are proposed. Acceptable wetland delineations must be performed at least in these locations and impacts determined before completion of SEQRA and cannot be left for future construction contractors to determine mitigating measures, Accurate tidal and freshwater wetland delineations must also be depicted on the SCWA Plans.

WJS-23
Section 2.6.1

8. The DEIS states,

> *"The small area of right-of-way containing Sudbury sandy loam (Su) soils is located along Main Road southeast of Crystal Lane in Aquebogue. This area is located south of a small adjacent National Wetlands Inventory (NWI) mapped wetland identified as being a permanently flooded, diked or impounded, palustrine wetland with unconsolidated bottom (PUBHh) which may be used for livestock, irrigation, or stormwater recharge. Opposite this feature, on the south side of Main Road is another adjacent PUBHh wetland, as well as a previously mapped Class 2 NYSDEC freshwater wetland identified as NYSDEC ID: MT-44.*
>
> *The small area containing Swansea muck, 0 to 1% slopes, coastal lowland (SwA) along Main Road is also in Aquebogue, east of the intersection of Main Road and Colonial Drive and south of "Vineyards at Aquebogue." Descriptions of these two soil types are provided below: Sudbury Sandy Loam (Su): This soil type is characterized by the Suffolk Soil Survey as deep, moderately well drained moderately coarse textured soil formed in a mantle of fine sandy loam or sandy loam over coarse sand or gravel. These soils are found on outwash plains and moraines in flat areas between poorly drained soils. Slopes generally range from 0-3% slopes. Permeability varies from rapid to moderate and fertility is low. Su soils are considered a Class II prime agricultural soil unit but may be affected by wetness. The seasonal high water table is at a depth of 1.5 to 2 feet. This soil has moderate limitations for pipelines potentially requiring dewatering during main installation and the risk of soil erosion is classified as "slight."*

WJS-24
Section 2.6.1

Swansea muck, 0 to 1% slopes, coastal lowland (SwA): This soil type is a very deep, very poorly drained organic hydric soil found in depressions and low-lying coastal areas. It consists of highly decomposed organic material over sandy material, typically with a black muck surface, featuring a high water table and frequent ponding. Seasonal high groundwater is typically near the surface, and the soils are highly acidic. It is possible that the area along the Preferred Alternative route containing Swansea muck, 0 to 1% slopes, coastal lowland (SwA) may require dewatering, but it is expected that in the past, the right-of-way portion of this area would have been filled with sand or gravel and possibly raised to ensure a suitable roadbed and safe and drivable road surface, thereby potentially minimizing some constraints."

Due to the hydric soil characteristics, the area must be field investigated using acceptable wetland delineation methods and a freshwater wetland delineation verified, if necessary, based on the investigation. Impact assessment and mitigation must be performed as needed.

9. By using acceptable field methods (I.E. NYSDEC Freshwater Wetland Delineation Manual, July 1995) for wetland boundary delineations, what is the horizontal distance(s) from the wetland boundary to the directional drilling entrance and exit pits; and proposed trenching areas?

   The DEIS states,

   "Therefore, significant direct impacts to wetlands are not anticipated and therefore, potential impacts are limited to temporary and indirect construction-related effects that may occur in areas near, but not within, mapped wetland resources and any minor impacts on area groundwater levels that can affect stream and wetland surface levels and stream flow."

   Impacts cannot be accurately measured until field verifications of the wetland boundaries are confirmed. The use of wetland inventory maps is appropriate only for identifying the general location of the wetlands. Actual wetland delineations change over time, due to natural (hydrologic influences) and anthropogenic influences (construction activities).

   The SCWA design drawings, wetland maps and aerials provided in the DEIS are not sufficient to assess wetland impacts. This is a common standard for large scale infrastructure projects that are planned within known wetland areas. It may be acceptable to field delineate wetland boundaries where the pipeline may be constructed near wetlands and exclude field delineation of wetlands where the constructions are clearly well outside wetland areas (such as within paved areas and consistent with the NYSDEC General Permit conditions).

10. At Rt 25 and Church Lane the Town of Riverhead is constructing a major stormwater mitigation project to improve water quality of Meetinghouse Creek; including use of a reconstructed freshwater wetland. How will this project be potentially impacted and what specific mitigating measures are planned?

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Section 2.6.1

Construction Activities & Traffic

The DEIS fails to meet the requirements set forth in the Final Scope (October 22, 2025). The Final Scope states,

> ***Existing Conditions:*** *(Describe the existing roadway characteristics within the area of disturbances; identify peak traffic seasons and times.)*
>
> ***Anticipated Impacts:*** *(Determine potential temporary impact on roadway conditions and operations based on anticipated construction methods, scheduling, peak traffic times, best management practices, and traffic controls.).*

11. There were no 24-hour or peak hours traffic counts provided in the DEIS for the proposed Action (Sound Avenue) or Preferred Alternative (Rt 25) roads. How can the Lead Agency evaluate traffic impacts when valid volumes are unknown? How can the Lead Agency determine route selection without this information; or assess traffic re-routing to other east-west roadways, such as Peconic Bay Boulevard to avoid construction? Standard traffic/vehicle trip counts are required to identify any seasonal fluctuations in traffic volumes along the Proposed Action route, Preferred Alternative route and Peconic Bay Boulevard Alternative route. The DEIS has used only anecdotal and speculative assessments to determine "peak traffic times" and to "identify peak traffic seasons and times." This is unacceptable. The Institute of Transportation Engineers Manual (ITE Trip Generation -12th edition) must be utilized to validate transportation related existing conditions, impacts and mitigation, including assessments on motor vehicles, bicyclist, pedestrian and truck trips along all potential routes.

12. The SCWA proposes to complete construction at a rate of 300-600 feet per day. Does this include full pavement restoration, topsoil and reseeding/plantings or is this rate simply estimated timeframes for pipeline installations and or temporary pavement restorations, such as "cold patch asphalt?" If cold patch asphalt or other temporary pavement restoration is anticipated, how will snow plowing potentially damage the restoration; and what is the schedule for full pavement restoration?

13. The SCWA estimates the project will take 12-18 months to complete. Does this estimated schedule include the curb-to-curb full pavement restoration, or is this only completion of the pipeline and its related infrastructure? Will full pavement restoration have adverse impacts during the months of April through November of any calendar year?

14. Tables 2-4 and 2-5 Soils: Comment- Provide an additional column in Tables 2-4 and 2-5 to identify the Agricultural Soils.

15. Construction disturbing Town sidewalks, and through Riverside Drive and Hubbard Avenue (Town roads) require review for permit applications by the Riverhead Superintendent of Highways pursuant to Town Code Article II Alterations and Excavations-Chapter 237.

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Section 2.11

WJS-27
Section 2.13

WJS-28
Section 2.13

WJS-29
Section 2.5

WJS-30
Section 2.13

WJS-37
Section 2.11

WJS-38
Section 2.11

WJS-39
Section 2.11

16. What are the expected traffic impacts and specific mitigation along Rt 25 in proximity to the Aquebogue Elementary School located at Edgar Avenue; how will construction impact schedules for buses, parents drop off/pickups, teacher and staff arrivals and departures?

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Section 2.11

17. In addition to the proposed Pier Avenue Booster Station, the Hydrogeologic Analysis & Route Evaluation Report (Appendix B) determined a second booster pump station would be required to maintain adequate pressure and volume if the Proposed Action (Sound Avenue route) is to be viable. Where would the second pump station be located; Rt 105/Rt 25 or some other location?

18. Golden Nematode- According to USDA recommendations issued in September 1968 as Agriculture Handbook No. 353, the decontamination of equipment would require either applications of methy-bromide, or steam cleaning methods to be employed before equipment is re-mobilized. The USDA publication of May 13, 2026 "Golden Nematode Program Manual" does not state it is a replacement to publication 353. The May 2026 manual was not issued when the Final Scope of the DEIS was accepted. The 2026 manual describes using power washing of equipment and recommends limits on the use of steam cleaning of equipment, with no mention of methy-bromide. Please explain in detail how golden nematode protective methods using decontamination will be utilized and be conducted during the project's implementation, including capturing all decontamination generated liquids and slurries, and what health and safety measures will be used to protect the public and non-target organisms. Use of the fumigant methy-bromide requires specific training and recordkeeping as per USEPA and NYSDEC requirements; are SCWA and its contractors trained for this type of control method?

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Section 2.3

WJS-33
Section 2.5

The construction staging area for the project identified a width of 10 feet, but no length for the staging area(s) was provided. Understanding that decontamination of heavy equipment, hand tools, clothing (worker boots, gloves, PPE) will require a designated area for use, that waters and slurries will need to be captured and appropriately disposed of as equipment is cleaned and wash waters captured within an impervious containment structure, construction equipment and materials and personnel require space outside the decontamination zone; with all this happening during "off season" late fall through winter months and possibly during nighttime hours. Please explain how these procedures will be carried out. Detailed diagrams would be useful with an explanation of procedures.

WJS-34
Section 2.13

19. The DEIS and figures do not adequately identify construction and material staging and storage areas. Please provide information on where the construction physical boundaries are located and where materials will be stockpiled along the Proposed Action and Preferred Alternative routes. The DEIS stated construction work, water main, backfill materials and excavated materials will be placed within a 10-foot-wide work area. A typical excavator is approximately 9-feet wide (excluding the boom-bucket movement radius), and considering the storage for a 24-inch diameter pipe, areas for deconstructed pavement, excavated materials, potential for utility relocation/conflict avoidance trucks,

WJS-35
Section 2.13

placement of worker vehicles, decontamination for golden nematode control, and backfill material staging areas, can the SCWA provide details of the proposed 10-wide working areas and how this will function?

20. Construction Schedule/Off Season: SCWA plans construction during the "off season" to minimize traffic and other impacts. Typically, the East End's peak summer season ends at Labor Day but this is quickly followed by back to school, fall "pumpkin-picking" and farm stand/winery activities that often extend through Thanksgiving. Due to Northern Long Eared Bat habitat protection, NYSDEC restricts tree clearing to the dates of December 1 through February 28 of any calendar year, which can compress construction schedules where clearing and grubbing are needed.

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The trend among many North Fork commercial establishments is an extension of the once traditional peak (summer) recreational season, towards a model of year-round operations. The Preferred Alternative route includes areas of Aquebogue and Jamesport which are characterized as small downtown areas. How will the project impact access and parking along the Preferred Alternative route where these year-round operations are located?

Snowfall in the Riverhead region can average about 26-inches per year during the months of December-March. Asphalt paving is typically recommended when ambient air temperature is 50 degrees Fahrenheit and above. Wintertime temperatures in Riverhead during December through March average in the mid-40 degrees Fahrenheit with average lows in the mid-20 degrees Fahrenheit.

Explain how the impact of weather conditions affects the constructability and completion schedules for the Project and what mitigation is anticipated to build the Project without interference from de-icing, snow plowing and snow removal necessary to maintain safe driving conditions and access to the commercial properties, schools and residential areas within the Project area?

Zoning/Community Characteristics

21. The DEIS in Section 3: Zoning: The DEIS makes the following statements:

> *"As previously discussed, road rights-of-way are not subject to land use and dimensional zoning requirements and the only part of the proposed project that is actually zoned is the booster station property. In addition, as indicated in the Monroe Assessment provided in Appendix C and included in Section 1.4, "Permits and Approvals Required (Involved Agencies) of this DEIS."*

WJS-32
Section 2.3

SCWA cannot assume that based on its own Monroe Balancing Test, it is immune from local zoning requirements. SEQRA requires the Lead Agency, "Take a Hard Look" at an Action, not simply look the other way, circumvent scrutiny or even the potential for local approvals and related project impacts.

The DEIS also states,

> *"…. it was determined by SCWA by Resolution dated November 20, 2025, that SCWA's proposed activities are undisputably immune from local municipal jurisdiction. Although the proposed booster station does not comply with all applicable zoning standards."*

How can the SCWA truthfully state in the DEIS that it is "undisputably immune from local municipal jurisdiction," while SCWA is before New York Supreme Court where a dispute is being heard and challenged on this very "undisputable immunity" from local municipal jurisdiction?[i]

WJS-40
Section 2.18

Therefore, consistent with the Town of Riverhead Monroe Balancing Test and Town Board Resolution 2025-860, adopted on October 7, 2025 (which pre-dated the SCWA Resolution by more than 40-days) the SCWA was found not to be immune from Riverhead's land use regulations. The SCWA's proposed location of the Preferred Alternative Booster Pump Sation within the RLC Zoning Use District shall be required to make application to the Town of Riverhead Town Board pursuant to Chapter 301-225B for a Special Use Permit, as determined by the Riverhead Zoning Officer. Additionally, SCWA's proposed Booster Station plans shall comply with all applicable Town Planning Board site plan requirements of Chapter 301 Zoning and Land Development of the Riverhead Town Code.

Not only does the DEIS fail to clarify the Town of Riverhead's Monroe Balancing Test proceedings and conclusions, SCWA as Lead Agency has ignored its responsibility to disclose the fact Riverhead's Town Board Resolution holds **reasonable potential** for enforcing the Project's land use impacts and mitigating measures. SCWA only provides its own Monroe information in Appendix C.

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Section 2.18

Notwithstanding Riverhead's potential as a designated Involved Agency, with authority to provide discretionary land use decisions, approvals and permits, SCWA repeatedly misleads other Involved Agencies, Interested Parties and the public that the Project need not comply with local land use regulations. It is noted the Courts have not made a decision on this matter and may likely not have a conclusion until well past September 11, 2026, DEIS comment period deadline. The Lead Agency has expressly if not purposely excluded details of Riverhead Town Board's Monroe Balancing Test proceedings and public testimony as an attempt to convey only its own decision of noncompliance with local land use requirements in favor and in support of its SEQRA review of the Project.

This approach resulted in excluding important and relevant DEIS information and erodes the integrity and objectivity of the Lead Agency's role. It is not uncommon for a project Sponsor to cast a favorable description of their proposed project. However, it is quite different to shadow the facts and distort the public's full understanding of a Proposed Action. Based on the DEIS near total absence of a comprehensive discussion of Riverhead's Monroe Balancing Test, I question how the Lead Agency deemed the DEIS complete and acceptable for public review and comment. The DEIS must be revised to adequately discuss the proceedings of Riverhead's Monroe Balancing Test with the Town Board Resolution 2025-860 to be added to Appendix C.

WJS-42
Section 2.12

Local municipal land use codes are designed to protect public and environmental health, safety, and welfare. Municipal codes prevent a project's sponsor from marauding through a municipality to achieve self-serving goals at the expense of the public and is one primary reason SEQRA was enacted.

Additionally, the Preferred Alternative route passes through several Riverhead zoning use districts including the APZ, RA-40, RA-80, RLC, HC, and VC. These zoning use districts are designed to preserve and protect Riverhead's rural community character, especially within the hamlets of Jamesport and Aquebogue. Construction and traffic impacts upon the rural character of the community and potential loss or damage to street trees along the Preferred Alternative route will be extremely disruptive to these hamlets for an extended period of time. The DEIS tends to understate this impact, and although general mitigating measures are proposed, the DEIS lacks sufficient details.

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Section 2.8

For example, if one travels from Rt 105 east to Edgar Avenue (where the Aquebogue Elementary School is located) it is a distance along Rt 25 of about 4500 feet. With the pipeline's minimum installation rate of 300 feet per day, one could be delayed in traffic for 15 consecutive days during the daily commute to school. That commute could be experienced during peak traffic hours with additional delays caused by school buses that might travel the same route. The commute could be greater than normal travel time.

22. There are several service utilities (gas, water, telecommunication, electricity) along the Preferred Alternative route. What impacts are expected from construction of the proposed water main on utilities, especially underground services? Will there be any interruption of these utilities; if so for how long and how will users who may lose service be accommodated? Why are these utilities not included in the DEIS existing conditions maps or plans? The Riverhead Water District maintains and hydrants along the north side of Rt 25; the District has concerns for soil disturbances during the installation of SCWA's 24-inch main; what mitigation measures will be imposed to avoid subsoils in the vicinity of the District's facilities from being disturbed and adding to potential damage to the water main? These same issues apply to other subsurface utilities. What are the horizontal and vertical depth of all utilities located along each of the proposed routes?

23. Unlike the Proposed Route, the Preferred Alternative has a plethora of small downtown type commercial businesses that will be impacted by the project. What accommodations and mitigation are proposed to avoid these impacts on their specific operations? Wineries and large restaurant catering facilities, for example, provide advanced reservations for major events (fund raising and private weddings for example). How has the SCWA coordinated with these entities in the route selection process and for potential construction impacts? Many of these entities may not have been involved in past hearings on the Project, simply because they understood the route was along Sound Avenue.

WJS-44
Section 2.16.2

24. The DEIS provides only a few paragraphs regarding the Peconic Bay Boulevard Alternative route for the water main.

The DEIS states,

> *"Since this option was previously considered by SCWA and found to be less desirable, it will not be detailed by this DEIS but is noted as another alternative route considered prior to current plan development."*

This is not sufficient for DEIS level Alternative assessment. Prior comments on the Draft Scope identified the Peconic Bay Boulevard route as not a reasonable alternative as defined by SEQRA. It is essentially a second No-Build scenario. A suggested alternative was the existing electric transmission easement area(s) located between Sound Avenue and Rt 25, which the Lead Agency did not evaluate. The DEIS has reduced the alternatives to No-Build and the Preferred Alternative and compared the later to the Proposed Action providing a "one or the other" assessment.

WJS-44
Section 2.16.2

The DEIS concluded that,

> *To hydraulically achieve the Proposed Action routing,* ***a second booster pump would be required at Pier Avenue,*** *or the main would have to be upsized to a 36-inch pipe. The larger pipe size has a negative impact on water age.*

Throughout the DEIS it was noted that if the Proposed Action was selected for the routing, a second Booster Pump Station would be needed to achieve Project goals, The conclusion section of the DEIS states that only a second pump at Pier Avenue's Booster Pump Station is needed. Please clarify the conflict.

WJS-45
Section 2.3

> *Through careful consideration of cost, head loss and water age, the analysis has identified the preferred route and pipe diameter.* ***Analysis of the three routes indicates that the Main Road Route is the most favorable option.*** *While the Peconic Bay Boulevard route performs well hydraulically, it presents significant environmental challenges due to its proximity to wetlands and the required water crossings.* ***The Sound Avenue route offers some constructability benefits however the hydraulic analysis highlights significant challenges in meeting the design flow rates. This leaves the Main Road route as the preferred option, as it is hydraulically favorable and avoids proximity to wetlands. The primary challenge associated with this route is the installation of the water main along a state highway, however there are several methods available to mitigate construction impacts.***

These "conclusions" are unclear. The DEIS claims there are hydraulic constraints with the Sound Avenue route, but also says it is "viable." Furthermore, with the addition of a second Booster Pumping Station, the Sound Avenue route would meet Project goals. However, the Rt 25 is described as the "preferred option," due to beneficial hydraulics and wetland avoidance. There are wetlands associated with each of these routes especially along County Road Rt 105, and along the Rt 25, although there were no wetlands described adjacent to Sound Avenue. Please clarify these statements.

WJS-46
Section 2.3

The Suffolk County Water Authority has dozens of miles of water main along state roads throughout the county and has extensive experience working within these corridors. While this presents a challenge, it is one where the Suffolk County Water Authority is well equipped to manage. For these reasons, the Main Road route is the most viable option for the North Fork Water Main Project.

According to published statements by the SCWA Chairman of the Board, the North Fork Pipeline Project is the largest water main construction project ever proposed in the Authority's 75-year history. There is no historical evidence the SCWA has any construction management experience with a project of this magnitude. SCWA only has experience with installing water main along state and county roads which involved much shorter distance, fewer traffic and utility conflicts and fewer environmental limitations. This is not a valid reason to support selecting Main Road as "the most viable option."

WJS-47
Section 2.16.4

This input, along with the numerous maps, figures, tables, plans, area plans and studies, technical reports, information and analyses included in the DEIS, input received from the public and involved and interested agencies, and past plans ***suggest that the Preferred Alternative may be the best, most feasible, most practical and less impactful route for the project****. The Preferred Alternative route is expected to be more costly and there are more driveways and one more intersecting road than the Proposed Action's Sound Avenue route, but overall, it is believed that the benefits of the Preferred Alternative warrant this route option for the project. Identified mitigations and best management practices for the Proposed Action examined throughout this DEIS are applicable to the Preferred Alternative and were expanded upon as needed to ensure that they can be applied to both the Proposed Action and Preferred Alternative to prevent, minimize or mitigate impacts along this route to the maximum extent practicable as required by SEQRA."*

The DEIS does not provide for any real conclusions. The above section only offers a "suggestion," for the routing of the water main and Booster Pumping Station. Additionally, the Rt 25 route was never the subject of intense scrutiny during the initial SEQRA process, filings and scoping sessions, because it was only considered as an Alternative and not described as the Proposed Action itself. This indicates the possibility of the Preferred Alternative receiving less input from the public, Involved Agencies and Interested Parties throughout the prior SEQRA process, until the comment period for the DEIS was available. Because the DEIS lacks sufficient information (actual wetland boundaries, overhead and subsurface existing utility vertical and horizontal locations, engineering plans that accurately depict topographic features such as wetlands, existing utilities, curbs, sidewalks, vegetation and considering no traffic counts were performed to assess impacts) for either of the proposed "viable" routes, the primary aspects in support of the Preferred Alternative option (Rt 25) are the hydraulic benefits to the SCWA. With the selection either "viable" route, significant construction and traffic related impacts are simply being shifted from one major east-west throughfare to the other, and these impacts occur within the municipal boundaries of the Town of Riverhead. Riverhead will receive no direct or indirect benefits from the Proposed Action or the Preferred Alternative. The DEIS has not considered the cumulative impacts these construction and traffic impacts will have on the North Fork.

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Section 2.10
Section 2.16.4

Residents and businesses use Main Road and Sound Avenue as routes in and out of Riverhead to access its major retail centers and discount box stores. These include BJs, Costco, Home Depot, Lowe's, Tanger Outlets, new and used vehicle dealerships, along Riverhead's Route 58 retail corridor. Municipalities including Southold, Village of Greenport, Southampton and East Hampton have no equivalent access to major retail. The DEIS must evaluate how the Project's 12–18-month construction timeframe impacts these retail services especially if traffic patterns are shifted from one roadway to another and drivers discover alternative routes to avoid delays by using local roadways, that have limitations on the ability to manage excessive traffic volumes.

The Lead Agency clarified at the DEIS Comment Session in Westhampton held on August 19, 2026, that it would not decide on the selected route until it issues its SEQRA Findings Statement. This leaves the North Fork Water Main Project in a state of flux, with no real conclusions identified in the DEIS. A project of this magnitude requires clarification for extensive coordination and planning within the municipalities in which it is located. This extended delay in route selection provides for no such coordination for identifying emergency response detours, and leaves the municipal officials charged with public safety welfare and protection of environmental resources with few options or ability for advanced planning and enforceable mitigating measures.

WJS-48
Section 2.10
Section 2.16.4

25. The comment period for the DEIS is insufficient. There is an ongoing court case that will not be concluded until after September 11, 2026. The decision(s) of the court will have a direct effect on the proposed project's review and approval process including the SEQRA record. The DEIS comment period must remain open until such time as the lawsuit(s) is settled and all parties understand what is necessary to comply with the court's instructions. Additionally, the DEIS was released on July 24, 2026, in electronic format only, however there were no notices by SCWA regarding availability of hard copies as required by SEQRA. There is a hard copy of the DEIS located at the Riverhead Free Library reference desk and the public must be notified of its availability.

Submitted on behalf of the Riverhead Town Board.

Thank you,

Jeffrey Seeman, CEP
Certified Environmental Professional

NATIONAL ASSOCIATION OF ENVIRONMENTAL PROFESSIONALS
JEFFREY L. SEEMAN
04404
CERTIFIED ENVIRONMENTAL PROFESSIONAL

WJS-50
Section 2.3

[i] **New York e-courts: Suffolk Supreme Court Index # 603662/2026 Suffolk County Water Authority vs, Town of Riverhead.**

Cc Erik Howard, Riverhead Town Attorney &
Annemarie Prudenti, Deputy Town Attorney
Town of Riverhead Town Hall
4 West Second Street
Riverhead, NY 11901- via email

Stanley J. Carey
58 W. Alfred Aveneue
Calverton, NY 11933

August 26, 2026

Suffolk County Water Authority
4060 Sunrise Highway
Oakdale, NY 11769

Reference: Comments on DEIS- SCWA North Fork Water Main Project

Dear Sirs,

Please accept my comments for the DEIS North Fork Water Main Project. Although all my comments may not be directly related to the DEIS, I would appreciate this being part of the official record.

My name is Stanley Carey I am a lifelong Riverhead resident and I have been working in the public drinking water industry for 40 years. I have worked, in the past, at both the Town of Riverhead Water District and Suffolk County Water Authority (SCWA) for many years. I have served as Chairman for both the Long Island Water Conference and Long Island Commission for Aquifer Protection. Presently, I am the Superintendent of Water and Sewer Operations for the Village of Garden City (Nassau County) as well as a member of the New York State Drinking Water Quality Counsel appointed by the Governor. Additionally, I have served as the Chairman of the Town of Riverhead Planning Board for several years.

I take no exception to the DEIS presented by the SCWA. In my opinion any and all concerns have been appropriately addressed and or mitigated. One must not lose sight of the purpose of this proposed project. That being to provide safe drinking water and adequate water pressure to communities on the North Fork of Long Island who are in critical need of it. SCWA has thoroughly planned this project, implemented appropriate conservation measures, and called for water use restrictions when needed. It is within the scope and mission of SCWA to move this project forward. This project is about placing water main in the ground for a specific documented purpose. This occurs on a routine, daily basis all over Long Island. It must not be confused with water withdrawal from the underground aquifer. SCWA is simply proposing withdrawing water from an area (aquifer) not as prone to the contamination issues typically encountered on the North Fork. This is the purpose the Central Pine Barrens Commission was created.

WSC-1
Section 2.23

WSC-2
Section 2.1

I would like to comment on the position the Town of Riverhead (TOR) has taken with regard to his project. I completely disagree that the TOR has objected to several phases of the approval process. The NYS DEC has ruled in favor of SCWA on the lead agency status. That not being enough of a message, the TOR decided to litigate the matter and conduct its own Monroe Balancing hearing. I believe this is a complete waste of taxpayer funds by the TOR.

I would like to point to a matter that was questioned, by me, when I was Chairman of the TOR Planning Board. Solar farms were a big issue during my tenure specifically along Edwards Ave in Calverton. I had come to understand the LIPA sub-station, on Edwards Ave needed to increase (build and expand) its facility to accommodate the power generated by the new solar farms nearby. I then presented several questions to the TOR town attorney's office to inquire if building permits and or any TOR approval was obtained. The reply I received, as I recall, was that LIPA was its own public authority and TOR approval was not required or within their authority. The LIPA sub-station was expanded without any permits or requirements from the TOR. It should be noted the power generated at this facility did not provide a complete benefit to the TOR residents. The LIPA sub-station, as explained to me, connected to the distribution grid in nearby Brookhaven Town.

WSC-2
Section 2.1

An additional example I offer is National Grid. National Grid has several ongoing gas main installation projects within the TOR (Elton St, Howell Ave). I do not recall any question or public notification / meetings by the TOR as to public disruption with regard to fire, police, trained flaggers, dust, or soil containment. This is also true for the major work completed by National Grid on Edwards Ave in Calverton. This project too serves residents outside the TOR via National Grids distribution network. National Grid has also expanded its gas plant (buildings) on Mill Rd and West Main St in the TOR. I do not recall the TOR requiring site plan approval and or building permits. Yet another example I offer is at my present place of employment at the Village of Garden City. The Propel power project is bringing a power cable from Westchester County through the north shore of Long Island to a newly built facility in Garden City. This project impacts many towns and Villages. The power facility being built is called the Uniondale Hub (but within the Village of Garden City). This project is being coordinated with the NY Power Authority. I have been intimately involved with this project. Our attorneys have advised the Village has no authority or control with regard to planning or zoning for the construction of the new buildings. The NY Power Authority has full oversight of this project but have agreed to furnish building plans as a courtesy only.

WSC-3
Section 2.18

I believe the facts overwhelmingly support SCWA, their authority, and proposed project to complete the North Fork Water Main project. I again question the TOR motives behind their self-fabricated obstacles in delaying and litigating this matter. Thank you for the opportunity

to provide comments. I hope you will find them helpful in completing your project in a timely manner.

Sincerely,

Stanley Carey

WSC-3
Section 2.18

Puma, Danielle

From: Suffolk County Water Authority <no-reply@scwa.com>
Sent: Monday, September 7, 2026 3:29 PM
To: Puma, Danielle
Subject: North Fork Main DEIS Comment Submission

Categories: Completed

[You don't often get email from no-reply@scwa.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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First Name: Greater Jamesport Civic Association Last Name: Greater Jamesport Civic Association Address 1: PO Box 191
City: JAMESPORT
State: NY
Zip Code: 11947
E-mail: gjamesportcivic@gmail.com
File Upload: No file uploaded.
Comment: The Civic Association wants the SCWA to be aware that Riverhead Town residents and especially our members will suffer many detrimental effects from the SCWA North Fork Water Main Extension Project. The project is a multi-year project that will be disruptive to our daily life - businesses, residents, tourists and emergency-response. Main Road has different impacts than Sound Avenue, including denser population, commercial hamlet centers, Aquebogue Elementary School, historic structures, existing utilities and town-regulated wetlands. Detouring traffic to Peconic Bay Blvd which was not built for high demand or commercial traffic will put serious stress on the residents and the roadway with its narrow bridges and limited weight restrictions. Another especially serious concern is placings the new SCWA mains close to Riverhead's existing water mains and hydrants. This will have serious future repair problems and conflicts.
The project will have no direct benefit to Riverhead.

WGJC-1
Section 2.11

WGJC-2
Section 2.11

WGJC-3
Section 2.12

WGJC-4
Section 2.1

Puma, Danielle

From: Suffolk County Water Authority <no-reply@scwa.com>
Sent: Wednesday, September 23, 2026 8:27 AM
To: Puma, Danielle
Subject: North Fork Main DEIS Comment Submission

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First Name: Deborah
Last Name: Wetzel
Address 1: 4635 Pequash Ave
City: Cutchogue
State: NY
Zip Code: 11935
E-mail: dwetzel1103@outlook.com
File Upload: No file uploaded.
Comment: We should move ahead with this project. I applaud SCWA for being forward thinking and realizing that we need to improve our water situation on the East End. There are always going to be environmental impacts, but i trust SCWA to handle this project. thank you

WDW-1
Section 2.23

Puma, Danielle

From: Suffolk County Water Authority <no-reply@scwa.com>
Sent: Thursday, September 24, 2026 10:05 AM
To: Puma, Danielle
Subject: North Fork Main DEIS Comment Submission

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https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fscwa.com&c=E,1,m2DHroFQCr-2LRDfjhC3gODXAu5cNgmWMycABgH-WuUX1bv7n_svrkdTdhbqrLV5LwrsVON_jQxfa2K45n8YRZCqodGjD1eba7nttk13yKv3wc6NEU61SO66jg,,&typo=1
website:

First Name: Suzanne
Last Name: Donovan
Address 1: 300 Fourth St.
City: Greenport
State: NY
Zip Code: 11944
E-mail: suzanned467@gmail.com
File Upload: No file uploaded.
Comment: This often repeated statistic has concerned me for some time: "70% of the drinking water the SCWA pumps during the summer goes to lawn irrigation."

WSD-1
Section 2.6.5

Reading about a public records request that explored that statistic is alarming, and points to where SCWA and local government efforts could effectively target their time & energy in aggressively promoting conservation efforts. Just 20 properties in Southold Town used 31.7 million gallons of public water over 13 months (July 2025-2026) while average residential usage over that same period is about 114,428 gallons.

I'm even less convinced now that we need an expensive pipeline drawing precious water from other wells than we do strong cooperation between Town Trustees, Southold Town government, the Village of Greenport and SCWA in devising creative regulatory tools and consistent messaging to move residents to conserve this critical public resource.

Thank you for the opportunity to submit comment.

WSD-2
Section 2.6.5

Group FOR THE East End

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Bridgehampton, NY 11932

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thegroup.org

September 24, 2026

Jeffrey W. Szabo, Chief Executive Officer
The Suffolk County Water Authority (SCWA)
4060 Sunrise Highway
Oakdale, New York 11769-0901

Via Electronic Transmission

RE: Public Comment: "North Fork Water Main Extensions"
Draft Environmental Impact Statement (DEIS) of July 2026

Dear Mr. Szabo,

Introduction:

On behalf of Group for the East End, I write to offer our comments on the above-referenced DEIS. Ahead of this submission, we have also examined the SCWA's adopted scoping outline, along with other related comments, and supplemental materials to best inform our review.

For the record, Group for the East End (founded in 1972) is a professional conservation organization representing the environmental and community planning interests of our several thousand member households, businesses, and individuals, who reside or have interests in the five towns of eastern Long Island.

For my part, I am a professional land use practitioner working in Suffolk County for over 40 years, with nearly two decades of collegiate teaching experience on the topic of environmental review and the State Environmental Quality Review Act (SEQRA).

Summary Statement:

After reviewing the DEIS, **and without offering an endorsement of the overall action** (given outstanding questions and information gaps – outlined below), we find the new first phase (Main Road) alternative to be superior to the original proposal.

This view is based on the preferred alternative's overall reduction in length and its relocation to a pathway that we find less likely to induce future development pressure on open land, along a scenic and historic roadway corridor of state-wide significance.

WRD-1
Section 2.16.1

WRD-2
Section 2.16.1

WRD-3
Section 2.16.1

We are also very cognizant of the value of Sound Avenue as an important and heavily traveled agricultural corridor with significant and constraining farm vehicle traffic and seasonal events. Such conditions could further restrict already limited traffic capacity, reduce public safety, and possibly extend the overall time of project construction.

Moreover, the preferred alternative's overall reduction in length will materially reduce potential construction impacts associated with pipeline installation, including; erosion, sedimentation, runoff, fossil fuel consumption, noise generation, fugitive dust, etc.

WRD-2
Section 2.16.1

Project Specific Comments:

Upon review of the DEIS for the subject action, we find that several important questions and outstanding concerns remain to be answered and should be addressed in the FEIS. A summary of those issues is provided below:

WRD-3
Section 2.16.1

Monroe Balancing:

It is in the best interest of both SCWA and local municipalities to reach an agreement on both how the subject action will be reviewed, and how all involved parties can work in a productive manner to address valid concerns on all sides.

To this end, we urge a resolution to the ongoing Monroe Balancing litigation, which assures full engagement and oversight by affected local governments in the SCWA decision-making process. Public trust is an essential part of the long-term success of any immediate and future infrastructure endeavor, and such trust must be built by forging a cooperative relationship with local governments, whose land use concerns and authorities must be respected. The SCWA has made strides in transparency and accountability through the years, but we do not support a heavy-handed approach to local officials that have legitimate concerns about how the development of significant infrastructure may impact their community.

WRD-4
Section 2.18

Third Party Monitoring:

We believe there is substantial value in having a third-party monitor engaged in a "real-time" assessment of any water main installation to provide the public and local governments with tangible assurance that any future water main installation is meeting and maintaining the highest level of performance throughout the construction period. Ideally, such monitors would report back to the SCWA, the respective towns, and permitting agencies, on whether project contractors are meeting the compliance obligations of any approval. Shared oversight can build trust, resolve minor compliance issues among interested parties, and provide an organized reporting pathway to regulatory agencies.

Experience has shown that regional and state regulatory agencies have limited capacity to sustain an ongoing oversight presence for projects such as the subject action.

WRD-5
Section 2.20

Given the well-documented public concerns raised over this project, as well as those of local governments in the affected area, we believe a project monitor is a sound mitigation measure to demonstrate SCWA's commitment to meeting all obligations related to any major transmission main approval.

The SCWA and local governments should consider a jointly funded monitor to assure objectivity and equitable enforcement of all project conditions, alongside any remedial or enforcement action that may be required throughout the project period.

WRD-6
Section 2.6.5

Southold Water Conservation:
The subject multi-million-dollar proposal highlights the need for a strategic water conservation project that can make a material difference in water consumption rates townwide. As a resident of Southold Town and SCWA customer for more than 25 years, it has long been my experience, that few, if any, property owners (many of whom are part-time residents) ever know about any of the SCWA's conservation policies, irrigation schedules, or water emergency declarations.

Likewise, despite the town's recent efforts to more effectively regulate water usage (notably residential irrigation), there is little if any active enforcement, and as most people irrigate at night, there is little reason to believe that the town will receive regular reports of violations.

From the outset of this proposal, we have advocated for a formal intergovernmental effort, (including SCWA and affected local governments) to inform and encourage residents to adopt both water quality and conservation strategies, which can make a meaningful difference in local water consumption rates and quality, and assure the most strategic use of scarce water resources.

Working together and with interested community and conservation organizations, we strongly believe that substantial change can be made. In the absence of such efforts, the town's reliance on a water supply that must be transported from Southampton Town, will only continue to grow, and the related vulnerabilities of a distant source supply will continue.

WRD-7
Section 2.21

Public Information:
Traffic concerns, including those associated with the preferred alternative, remain a potentially significant impact throughout project construction.

To mitigate this impact, we strongly recommend that SCWA create a project information website that provides the public with ongoing "real-time" updates for any approved project, especially with respect to identifying areas of anticipated traffic congestion or substantial construction/excavation.

Providing a single site where members of the public, community organizations, and municipalities (which are very likely to be contacted by concerned citizens and businesses) can access project updates and learn about anticipated traffic concerns, construction expectations, project delays, project progress, etc., would be extremely helpful in keeping affected communities informed, reducing misinformation, and providing a single source for current project updates.

The website should also provide an opportunity for visitors to ask questions, submit complaints, and report potential violations. We believe a website that is both informative and responsive would be very significant to the SCWA's efforts to productively engage community stakeholders and public officials.

WRD-8
Section 2.17.1

East Marion-to-Orient Segment:
Because the East Marion-to-Orient project segment is not yet funded or scheduled, any future advancement of such a water main may be years away.

As such, local environmental, water quality, and land use conditions (such as zone changes or new development) may substantially change between any approvals of the subject action and the initiation of this proposed easternmost segment. Because SEQRA regularly requires the consideration of new information or conditions in long-range, multi-phase projects, the SCWA should commit to a responsible review of any such significant information at the time any future water main extension to Orient is proposed.

A responsible commitment to this process for the East Marion-to-Orient segment (which is presently part of the overall action under review) can save significant time and conflict in the future, should this part of the project ever come to pass.

This recommendation is not a request for a new DEIS, but rather a supplement to the DEIS that can address relevant concerns at the time a future proposal becomes ripe for consideration. In general, such a supplement would include an examination of any substantive change in environmental conditions, new information, any new technological options for installation or construction management, improved mitigation measures, new water quality or supply data, storm mitigation/recovery plans, along with any substantive land use and zoning changes, etc.

WRD-9
Section 2.15

In this case, the issue of growth inducement should also be extended beyond the boundaries of the proposed water main extension to the historic Orient hamlet. Given the SCWA's nearby community well field at Browns Hills, and the Authority's past interest in connecting Browns Hills to its wider water supply system, any future assessment of the East Marion-to-Orient segment must consider the extremely high likelihood of a main extension to its Browns Hills well field, as well as a further extension to Orient Point.

SCWA will recall that it received testimony during its public hearing process from advocates for public water extension all the way to Orient Point. Such an extension would bring the water main past substantial areas of undeveloped land and ultimately to at least two commercial properties at Orient Point.

We fully understand that local zoning remains the purview of Southold Town, but the presence of infrastructure is a well-understood inducement for growth, and it should be recognized, and evaluated as such in any comprehensive community planning or infrastructure assessment.

Future analysis of the East Marion-to-Orient segment should also include a detailed assessment of potential risks/resiliency measures and post-event responses for storm-related impacts (breaks, leaks) to the proposed water main, most notably along the Orient causeway. Sea level, storm frequency, and storm intensity are all continuing to rise, and any increased reliance on public water that must cross this vulnerable causeway must be carefully considered and provided with specific storm response and recovery plans for what is very likely to ultimately be an inevitable event.

In addition, should this segment of the proposal proceed, we strongly recommend that the SCWA fully consider and incorporate relevant information from the **2025 Orient Water Resources Study** (available at orientassociation.org) which was recently completed by the Orient Association, and prepared by a widely recognized and highly qualified consulting firm (CDM Smith).

This study represents a substantial investment of community time and resources focused on the future water resources planning and protection needs of the Orient hamlet. It would be of significant value to the overall supplemental assessment of this segment of the project to include both the data and water supply management options evaluated by the plan.

Suffolk County Parkland:
It is unclear to us whether the proposed action's transit along Cross River Drive (Suffolk County Route 105), will impact any Suffolk County Parkland or be fully confined to the road shoulder. If Suffolk County Parkland is to be encroached upon, there may be alienation implications, which should be explained in the FEIS. If not, the FEIS should affirm that no public parkland or preserves will be encroached upon by the proposed action.

Directional Drilling Operations:
The FEIS should provide further construction details for the anticipated directional drilling recovery pools, especially for those areas of drilling that are proposed to go under the Peconic River. Cross sectional design drawings, depths to groundwater and site restoration provisions should be presented. The same should be presented for any work proposed for any future East Marion-to-Orient segment.

WRD-10
Section 2.12

WRD-11
Section 2.6.2

WRD-12
Section 2.8

Lighting Compliance and Building Considerations:
The FEIS should make clear that for all proposed building or site plan construction (booster stations), all future facilities will comply with the dark sky lighting standards of the appropriate local jurisdiction. Consistent with mitigation outlined in the DEIS, all building site plans (for booster stations) should minimize site clearing, maximize the use of native vegetation during replanting/landscaping, maintain all runoff on site, and explore the use of pervious paving surfaces where practicable.

WRD-13
Section 2.2.1

Summary and Conclusions:

We appreciate the opportunity to review the DEIS for the subject proposal.

Based on our review, and in addition to the recognized impact reduction associated with the preferred alternative, we find substantial opportunities for increased mitigation of potentially significant impacts in the areas of; cooperative governmental decision-making, long-term public engagement and education, third-party oversight, web-based "real time" information during construction phases of the project, and sustainable design mitigation (for permanent service structures/booster stations). Moreover, future assessments of environmental conditions, coastal resiliency risks, post storm recovery strategies, and expanded growth inducement assessments for the East Marion-to-Orient segment should all be committed to as part of any final project conditions or approvals.

WRD-14
Section 2.3

We remain available to respond to any questions you may have or provide any additional information that may be needed to support our recommendations. I can be reached at bob@thegroup.org .

Sincerely,

Robert S. DeLuca
President

cc: Supervisor Albert Krupski, Town of Southold
Supervisor Jerome Halpern, Town of Riverhead
Supervisor Maria Moore, Town of Southampton
Suffolk County Legislator, Greg Doroski
Suffolk County Legislator, Ann Welker
New York State Assemblymember, Tommy Johhn Schiavone
New York State Assemblymember, Jodi Giglio
NYSDEC Regional Director, Cathy Haas
Suffolk County Commissioner of Public Works, Charles Bartha P.E.

WRD-15
Section 2.22

PUBLIC COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

SCWA North Fork Water Main Extension Project

TO:	Suffolk County Water Authority (SCWA) & SEQRA Lead Agency Hearing Officer
FROM:	Thomas Moore, Resident - Town of Southampton, 36 Lilac Road, Westhampton Beach, NY 11978
DATE:	September 24, 2026
SUBJECT:	Comments Regarding Groundwater Plumes, Surface Water Depletion, Full Capacity Pumping, and Off-Peak Storage Alternatives

1. Statement of Interest and Overview of Objections

As a resident of the Town of Southampton, I am submitting these comments on the Draft Environmental Impact Statement (DEIS) prepared by Nelson, Pope and Voorhis, for the proposed Suffolk County Water Authority (SCWA) North Fork Water Main Extension Project. While providing long-term public water infrastructure is an important public goal, the DEIS needs to adequately evaluate the water quality impacts that pumping millions of gallons of groundwater out of Southampton may cause.

The DEIS, as prepared by Nelson, Pope and Voorhis, references the 50-trillion-gallon regional capacity of the Sole Source Aquifer which diverts attention from localized water table drawdowns. By evaluating impacts through a broad regional lens the DEIS does not evaluate localized risks such as:

- **Omission of Known Contaminant Plumes & Specific Industrial Solvents:** The DEIS fails to evaluate how increased pumping near Gabreski Airport and Speonk will interact with known chlorinated solvents and PFAS plumes and omits an inventory of regional contamination sites.
- **Unaddressed Surface Water Depletion & Harmful Algal Bloom (HAB) Risks:** Removing groundwater intercepts freshwater baseflow to specific Southampton streams and ponds, that may increase water temperatures and increase toxic cyanobacteria blooms.
- **Failure to Model Hydrogeologic Impacts at Maximum Pipeline Capacity:** The DEIS evaluates groundwater drawdown strictly under an estimated average demand of 980 gpm (1.41 MGD), completely ignoring if the pipeline operates at its physical design capacity of 6,000 gpm (8.64 MGD).
- **Omission of Bulk Storage Reservoir Alternatives:** The DEIS does not consider off-peak bulk storage reservoirs in Southampton, Southold, or both municipalities as a sustainable mitigation to summer groundwater transfers.
- **Absent evaluation of expected demand based on current zoning** in the towns of Southold, Riverhead, Brookhaven, Southampton and East Hampton, as well as in the incorporated villages within each town.

WTM-1
Section 2.6.4

WTM-2
Section 2.6.4

WTM-3
Section 2.6.3

WTM-4
Section 2.12

WTM-5
Section 2.15

2. Omission of Known Contaminant Plumes & Specific Industrial Solvents

The DEIS indicates that SCWA plans to supply the North Fork pipeline by increasing pumping across 33 public supply wells in 12 wellfields within the eastern portion of the South Shore Low pressure zone. Several of these tapped wellfields, most notably **Gus Guerrera (+86.89 gpm increase by 2050), Spinney Road (+123.82 gpm), and Oak Avenue (+19.99 gpm)**—are located near or downgradient to significant active groundwater contamination plumes containing hazardous industrial chemicals:

- **Speonk Industrial Solvent Plume:** A multi-mile underground plume of chlorinated Volatile Organic Compounds (VOCs) and cleaning solvents originating from industrial operations in Speonk and migrating south toward Montauk Highway. The DEIS contains no analysis of how nearby wellfield drawdowns will alter groundwater flow gradients relative to this plume.
- **Frances S. Gabreski Air National Guard Base Plume:** The DEIS omits two distinct contamination profiles originating from historical military operations at Gabreski Airport:
  - Chlorinated Industrial Solvents (OU-01 / Site 8): Historical disposal of maintenance solvents into base cesspools and septic structures created significant groundwater contamination containing 1,1,1-Trichloroethane, Trichloroethylene (TCE), and Dichlorobenzene.
  - Per- and Polyfluoroalkyl Substances (OU-02 / AFFF): Extensive historical training with aqueous film-forming foam (AFFF) generated a widespread PFAS plume consisting primarily of PFOS (Perfluorooctane Sulfonic Acid) and PFOA (Perfluorooctanoic Acid).

Despite the presence of these toxic chlorinated solvents (TCE, 1,1,1-trichloroethane, dichlorobenzene) and persistent PFAS compounds (PFOS, PFOA), the DEIS contains no evaluation on whether or to what extent the proposed pumping of millions of gallons of water a day will affect the migration of these pollutants.

WTM-6
Section 2.6.4

Contamination Site Inventory Required in FEIS:
The Final EIS should include a comprehensive inventory of all NYSDEC Class 2 Inactive Hazardous Waste Disposal sites, Voluntary Cleanup Program sites, Brownfields, State Superfund sites, and active petroleum/chemical spill sites within the capture zone of all 33 supply wells. SCWA must execute 3D solute transport modeling for each identified site and establish legally binding wellhead filtration commitments and pumping limits prior to project approval.

3. Specific Surface Water Depletion & Harmful Algal Bloom (HAB) Risks

Groundwater pumping in Southampton directly intercepts freshwater baseflow that feeds local coastal streams, ponds, and groundwater-dependent wetlands. The DEIS projects a localized water table drawdown of up to 0.35 feet near Quogue under average demand, which causes direct, measurable baseflow reductions in specific Southampton surface waters, including: Beaverdam Pond; Aspatuck Creek; Quantuck Creek; and the Speonk River.

WTM-7
Section 2.6.4

Removing clean groundwater during peak summer droughts reduces natural flushing, may elevate water temperatures, concentrate nutrients—and may exacerbate cyanobacteria (blue-green algae) blooms in

coastal ponds. These possible effects should be evaluated. This should be done for the estimated demand, peak demand, and maximum pumping capacity for the proposed pipeline.

4. Failure to Evaluate Hydrogeologic Impacts at Maximum Pumping Capacity

The DEIS is based **exclusively on a projected annual average demand of 980 gpm (1.41 million gallons per day)** by the year 2050. While using an estimated average demand is useful for long-term growth planning, it is insufficient for SEQRA environmental impact evaluation.

The physical infrastructure specified in the DEIS—a 24-inch transmission main with high-capacity booster stations—is engineered for a **maximum peak flow capacity of 6,000 gpm (8.64 million gallons per day)**. The DEIS should evaluate stress under full design capacity for two critical reasons:

- **Peak Summer Drought Stress:** Water supply systems experience maximum stress during extreme summer heatwaves and prolonged droughts. As demonstrated in July 2026, when SCWA declared a Stage 1 Water Alert in Southampton due to record pumpage and constrained supply, actual withdrawals spike dramatically above annual averages. Operating the pipeline at or near 6,000 gpm during drought surges will compound localized water table drawdowns far beyond the modeled 0.35-foot estimate.
- **Growth-Inducing Secondary Impacts:** Installing 8.64 MGD of physical transmission capacity invites greater demand on the North Fork, facilitating suburban sprawl and increased wastewater loading that the DEIS does not evaluate under operations at full capacity.

WTM-7
Section 2.6.4

WTM-8
Section 2.6.3

5. Evaluation of Bulk Storage Reservoir Alternatives in Southampton or Southold

To mitigate environmental impacts associated with pumping groundwater during summer droughts, the FEIS should evaluate constructing large bulk water storage tanks or reservoirs. These storage facilities could be sited in **Southampton, Southold, or both municipalities**, functioning as a flexible seasonal buffer reserve.

- **Off-Peak Seasonal Harvesting:** Under this operational alternative, storage reservoirs could be filled during wet winter and spring months when regional groundwater levels are at their annual peak, stream flows are abundant, and demand is low.
- **Summer Peak:** During summer peak surges, water could be released from the reservoirs to meet demand, reducing the need to over-pump Southampton supply wells during summer droughts or issue emergency water conservation restrictions.
- **System Resilience & Fire Protection:** Bulk storage reservoirs in either or both towns provide vital pressure stabilization, emergency fire-fighting reserves, and back-up supply during power outages or transmission line failures.

WTM-9
Section 2.12

6. Evaluate with all affected municipalities the local zoning and projected collective demand on the aquifer.

- **Zoning in the Towns of Southold, Riverhead, Brookhaven, Southampton, and East Hampton:** As a regional water authority, the DEIS should assess regional water demand, including projected build-out under current zoning in each town. This analysis would help SCWA anticipate future service needs and assist municipalities in planning for local housing demand.

WTM-10
Section 2.15

- **Riverside Wastewater Treatment Plant:** Southampton Town has a proposed wastewater treatment plant in the hamlet of Riverside, the DEIS needs to evaluate the effects not just of the treatment plant, but the proposed housing being considered in that hamlet.

WTM-11
Section 2.6.4

7. Summary of Requests for the Final EIS (FEIS)

Prior to issuing any Final EIS or SEQRA Findings Statement, the Lead Agency should address these omissions:

1. Complete an inventory within the capture zone of all 33 supply wells and determine the effects of the considered pumping for identified chlorinated industrial solvents (TCE, 1,1,1-trichloroethane, dichlorobenzene) and PFAS compounds (PFOS, PFOA) and any other identified pollutants of concern.

WTM-12
Section 2.6.4

2. Evaluate water table drawdown simulations under peak operational scenarios up to the pipeline's maximum 6,000 gpm (8.64 MGD) design capacity.

3. Perform field-verified ecological assessments and evaluate threshold pumping limits for Beaverdam Pond, Aspatuck Creek, Quantuck Creek, and Speonk River if appropriate.

4. Considerer construction off-peak bulk storage reservoirs in Southampton, Southold, or both towns.

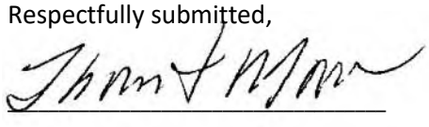
WTM-13
Section 2.6.3

5. Examine the cumulative demands of the Riverside redevelopment, and the zoning in each of the several towns to determine the anticipated full demand under current zoning.

CONCLUSION: These comments do not oppose providing clean water to the Town of Southold. Rather, they request verification that the proposed water supply is clean and a comprehensive evaluation of environmental impacts, mitigation measures, and appropriate limits on design flow before the FEIS is issued.

WTM-14
Section 2.12

Respectfully submitted,



Thomas F. Moore, Resident of Southampton Town
36 Lilac Road
Westhampton Beach, NY 11978

WTM-15
Section 2.15

To whom it may concern,

I am writing on behalf of Peconic Baykeeper, an environmental nonprofit organization dedicated to protecting and restoring Long Island, drinkable, swimmable, and fishable waters. This letter is in regards to the draft environmental impact study for the SCWA North Fork water main extension project.

The DEIS does not sufficiently address that the addition of this pipeline will be an added stressor to an ecosystem already struggling. Nitrogen loading, habitat loss, coastal development pressures and climate change have already diminished the resilience of the estuary and to install this pipeline according to the proposed pathway would greatly impact the surrounding area generating more stress that would supersede mitigation strategies outlined in DEIS. One example of a continuous stressor not accounted for is repair and maintenance to the pipeline once installed.

The plan to horizontally drill and insert the water main extension under the Peconic River, brings up concerns for the long term maintenance of this pipeline. Given the lack of preconstruction environmental baselines and post construction benchmarks in the DEIS, it would be difficult to determine the impact of repairs as they are needed to maintain the pipeline. Repairs will likely lead to disturbances in surrounding critical wetland habitat. These disturbances can move sediment around will increase sedimentation and turbidity which can impact submerged aquatic vegetation and benthic invertebrates, including ecologically and commercially important species, having an overall negative impact on critical habitat relied on to maintain a biologically diverse healthy ecosystem.

Peconic Baykeeper would encourage Suffolk County Water Authority to further examine the long term environmental impacts this project will have

WAA-1
Section 2.7

WAA-2
Section 2.7

WAA-3
Section 2.7

on such a critically important ecosystem that already faces continuous challenges.

Sincerely,
Alexa Annunziata
Director of Outreach
Peconic Baykeeper

WAA-3
Section 2.7

Puma, Danielle

From: Suffolk County Water Authority <no-reply@scwa.com>
Sent: Friday, September 25, 2026 5:02 PM
To: Puma, Danielle
Subject: North Fork Main DEIS Comment Submission

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https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fscwa.com&c=E,1,sHEGumAnRLwaRSdRd_oGDw2IM5mE1bbBGIWiHScuUBwsyxGytNOngqCNPAwmNCf512RKJTiX3Jhd8nBfZUYYKnlhYIBLRYMlHQgJtHGXfKImt34f&typo=1
website:

First Name: Jenna
Last Name: Schwerzmann
Address 1: 35 Shrubland Road
City: Southampton
State: NY
Zip Code: 11968
E-mail: jenna.schwerzmann@gmail.com
File Upload: No file uploaded.
Comment: Please focus on water conservation rather than drilling for new pipes. Thank you.

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I sit on the Town of Southold Water Advisory Committee and the comments I provide in this statement regarding the North Fork Pipeline Project are my own and do not represent the town. Due to time restrictions in reviewing the document, I have limited my comments to the content of the Hydrogeologic Investigation contained in Appendix B of the DEIS.

Appendix B North Fork Water Min Project: Hydrogeologic Analysis and route Evaluation Study Report

1. <u>DEIS overstates the benefits of the preferred alternative (Page 5):</u> *"The Nork Fork water main will help preserve and restore the local aquifer, even when faced with changing climate conditions. This is because the water main will decrease the demand from Suffolk County Water Authority production wells and reduce the risk of over-pumping in the Town of Southold. Bringing water in from outside the North Fork hydrogeologic system will further help to preserve and restore the aquifer."*

This statement overstates the benefits of the preferred action as peak demand is experienced in very limited circumstances as 5 hour periods during the 5 months of the year when residential irrigation is in use.

"The Southold system is easily capable of providing this normal off-peak demand." (p.24). The existing water supply system adequately meets the current needs of the residents of the Town of Southold for 7 months of the year and for all but 5 hours a day during days of peak demand (2-7 am in June, July, August, September and October). The system fails to meet the needs of the community ONLY during discrete periods of peak demand which vary each year, day and month due to variations in temperature and precipitation. The cause of the increased peak demand in the warmer months has been attributed to non-agricultural irrigation. The risks of over-pumping presented in the DEIS are limited to periods of peak demand in the months where irrigation is needed.

The DEIS introduces a plan to discontinue use of 8 public supply wells with increasing concentrations of chlorides in the Southold system as the increases in chloride concentrations are indicators of salt water intrusion. It is asserted that the discontinuance of regular use of 8 of the wells in the network will help preserve the local aquifer by reducing the risk of over pumping and causing a permanent, non reversible condition of salt water intrusion in the proximity of these supply wells.

Aquifer restoration is not discussed in the DEIS even though it is presented as a benefit of the preferred action.

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2. Calculations of projected growth in new services for main body of Southold use possible outlier data from pandemic period and may skew growth high relative to true growth rates (Table 3).

In the year 2050, projected annual volumetric demand on an annual basis is 2,001 million gallons. This is only 504 million gallons more than what was produced in 2024 (Table 6).

The projected annual volumetric demand is based upon projected growth of new services in Town of Southold of 113 new connections/year (in the Southold main project area) which are anticipated from both conversions of households with private wells as well as new homes. The 113 average for new services is calculated using 5 years of data (2021-2025) as shown on Table 3 of Appendix B. As shown on the table, the number of new connections has decreased from 149 in 2021 to 98 in 2025. Given that 2021 was a pandemic year when many New Yorkers moved out to their seasonal homes, it is possible that the number of new services spiked to 149 as a result of increased conversions from private well to public supply and/or increased new construction. Removing the 149 new services outlier and taking the average of the other 4 years yields a projected increase in public supply of 103 new services a year. The median of the 5 years of new services also yields a value of 103 which may be a better indicator of projected new services. Reviewing the previous 5 years of data on new services may confirm whether the 149 new services is an outlier or not. Nonetheless, over the 25 years of projected increases in service, this reduction of 10 new services a year would result in 250 fewer new services, bringing the projected new main body services from 12,682 down to 12,432 and the total number of projected services (including the Orient phase of the project) from 13,044 to 12,794. Using the peak demand factor of 1.27, the resulting peak demand for water would be projected to be 16,248 gpm or 321 gpm less than the 16,569 gpm proposed in the DEIS.

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3. Removal of wells from service and growth projections result in need for only limited amounts of water during select times of the year. Eight wells are being proposed to be removed from service (Table 7) and held in reserve for emergency purposes only. The reduction in annual average production from these wells is 32.497 million gallons.

It is expected that projected annual production by wells on the North Fork after the pipeline goes into service will be 1486 million gallons. It was 1497 million gallons in 2024 and is estimated to reach 1529 million gallons in 2026 before the pipeline goes into service.

Given the limited amount of water that needs to be replaced as a result of removing 8 wells from service and the limited amounts of water needed to meet peak demand during the 5 months when irrigation is used, it is unconscionable that Town of Southold is not involved in the decision making processes for this project and preproject planning.

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4. Impacts to the Water Table from the proposed project:

The groundwater model predicts a maximum localized 0.27 foot rise in the elevation of the water table on the North Fork as a result of the project. While the model doesn't take sea level rise into account because it will occur whether or not the project is undertaken, it is important to note that sea level has already risen about 10 inches on the North Fork relative to it's position in the 1930's as measured from New London, CT (Long Island Sound Partnership, Sea Level Trends). For homes in low lying areas this may be the difference between a safe 3 foot separation distance between the bottom of a leaching pool/seepage facility and an unsafe condition where pathogens may escape an unimproved septic system, move directly into groundwater and be transmitted to surrounding water bodies placing our shellfish and fisheries at risk of contamination.

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The greatest rise in water table elevations is predicted by the groundwater model for only a few areas within Southold (Orient Village, East Marion, Hortons Neck in Southold, and Mattituck) (see Figure 5 of the groundwater model presented in Appendix B of Appendix B-Hydrogeologic Investigation of the DEIS).

Rising sea level increases the elevation of the water table and creates many problems in coastal communities such as: inundation of subsurface infrastructure (e.g.septic systems, buried sewer pipes, water supply piping, buried utility lines); instability of roads in areas where the water table moves closer to the ground surface; and increased flooding from storms as the vadose zone is reduced.

The groundwater model run for the DEIS predicts a maximum increase of 0.3 feet in the water table as a result of implementation of the project. The modeled increase in height of the water table is not considered a potential significant impact because the elevation increase is within the range of annual fluctuations of the water table and because sea level rise is expected to continue whether or not the project is implemented. However, the potential impacts to subsurface infrastructure, roads and increases in flooding NEED to be addressed in the DEIS if project implementation contributes to their occurrence. And the model for the North Fork must take sea level rise into account so that all public policy makers become fully aware of the potential impacts of the proposed project.

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5. The siting study for new public supply wells is flawed because it did not consider agricultural land that has been preserved for development of new public supply wells (p69).

The siting study presented on p. 69 of the hydrogeologic investigation eliminated preserved agricultural land from further consideration for potential new well locations even though exemptions could be carved out from their protections to use these lands for the public

good. The siting study criteria are flawed and there may in fact be satisfactory new locations for public supply wells on the North Fork that have never been considered.

In addition, USGS has recently mapped a confining unit on the North Fork and identified a potential new aquifer that appears to be partially confined and may be able to provide water in sufficient quantity and quality for public supply. While preparation of the DEIS has overlapped with the finalization of the Long Island Groundwater Sustainability Project (Phase II, Suffolk County), it is not mentioned in the DEIS, nor has provision for incorporation of its' findings been made. It is necessary to incorporate all new scientific data into the DEIS for the North Fork as it has been many years since additional research into the hydrogeology of the area has been conducted and new information may become available to assist with aquifer management and infrastructure planning.

Respectfully submitted,

Caroline Yates

September 25, 2026

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