
FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS)

SUFFOLK COUNTY WATER AUTHORITY NORTH FORK WATER MAIN EXTENSIONS

Riverside/Flanders to Southold & East Marion to Orient

NPV No. 23251

Prepared for Submission to:

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October 2026

Date Accepted by Lead Agency October 29, 2026

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(Lead Agency)
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TABLE OF CONTENTS

<u>Section No.</u>	<u>Section Topic</u>	<u>Page</u>
1.0	INTRODUCTION	1-1
1.1	Purpose of this Document and Document Availability	1-1
1.2	Purpose of the Project	1-2
1.3	Project Description	1-3
1.3.1	Proposed Action Routing	1-3
1.3.2	Preferred Alternative Routing	1-5
1.3.3	DEIS Preliminary Conclusions and Considerations in Route Choice	1-6
1.4	SEQRA Process	1-7
1.4.1	Preparation of an Environmental Assessment Form, Lead Agency Coordination and Adoption of a SEQRA Positive Declaration	1-7
1.4.2	Scoping	1-8
1.4.3	Preparation and Acceptance of Draft EIS and Scheduling of Public Hearings	1-10
1.4.4	Final Environmental Impact Statement	1-11
1.4.5	Findings Statement	1-12
1.4.6	Monroe Balancing Test for Qualified Immunity	1-12
1.5	Organization of this Document	1-13
1.6	Project Modifications and/or Additional Mitigation Measures	1-19
2.0	COMMENTS AND RESPONSES	2-1
2.1	Project Background, Public Need, Project Sponsor Objectives and Benefits	2-1
2.2	Project Details	2-5
2.2.1	Directional Drilling	2-5
2.3	Booster Stations	2-8
2.4	Construction Schedule and Operations	2-11
2.5	Topography, Soils and Agriculture	2-12
2.6	Water Resources	2-14
2.6.1	Surface Waters and Wetlands	2-14
2.6.2	Groundwater	2-20
2.6.3	Impacts of Transferring Water from One Community to Another: Water Supply and Water Table Drawdown and Mounding	2-26
2.6.4	Drinking and Surface Water Quality	2-33
2.6.5	Water Use and Water Conservation	2-36
2.6.6	Groundwater Conservation Recommendations	2-48
2.7	Ecology and Habitat	2-50
2.7.1	Coordination with Local Environmental Organizations	2-51
2.8	Land Use	2-52
2.9	Zoning	2-55
2.10	Noise	2-57
2.11	Traffic	2-58
2.12	Utilities and Infrastructure	2-64

2.13	Construction Impacts	2-75
2.14	Cumulative Impacts	2-77
2.15	Buildout Analyses and Growth-Inducing Aspects	2-77
2.16	Alternatives	2-81
2.16.1	Alternative 2: Preferred Alternative	2-83
2.16.2	Alternative 3: Peconic Boulevard	2-88
2.16.3	Change from Proposed Action to Preferred Alternative	2-90
2.16.4	Alternatives, General	2-91
2.17	SEQRA Process and Procedures	2-99
2.17.1	Permits and Approvals Required; Determination of Lead Agency, Involved Agencies, and Interested Agencies	2-99
2.18	Monroe Analysis	2-108
2.19	SCWA Authority and Decision-Making Process	2-120
2.20	Third Party Monitoring and Oversight	2-122
2.21	Real-Time Public Information During Construction	2-123
2.22	Miscellaneous Comments	2-123
2.23	General Support	2-126

TABLES

1-1	Verbal Comments Received at Public Hearings — August 19, 20, and 26, 2026	1-14
1-2	Written Comments Received — July 23, 2026–September 25, 2026	1-16

APPENDICES

A Public Hearing Transcripts

- A-1 Westhampton–Southampton Public Hearing Transcript, August 19, 2026
- A-2 Orient–Southold Public Hearing Transcript, August 20, 2026
- A-3 Riverhead Public Hearing Transcript, August 26, 2026

B Written Comments received Jul23, 2026 through September 25, 2026

- B-1 Involved and Interested Agencies and Public Officials
- B-2 General Public, Environmental Organizations, Business Groups and Civic Associations

C Plans

- C-1 Preferred Alternative Plans and Details, prepared by SCWA
- C-2 Peconic River Directional Drill Crossing Plan, prepared by SCWA
- C-3 SCWA & Riverhead Water Main Crossing (Draft EIS Proposed Plan and Preferred Alternative)
- C-4 Directional Drill and Wetland Details Maps

D Amended Soil-Characteristics Tables

E South Shore Low Source Well Map

F NYS Department of Transportation Correspondence

SECTION 1.0 INTRODUCTION

1.0 INTRODUCTION

1.1 Purpose of this Document and Document Availability

This document is the Final Environmental Impact Statement (“FEIS”) for the Suffolk County Water Authority’s North Fork Water Main Extensions project. Pursuant to 6 NYCRR 617.9(b)(8), the FEIS incorporates by reference the July 2026 Draft Environmental Impact Statement (“DEIS”) for the Proposed Action, as revised or supplemented by this FEIS. Together, the DEIS and FEIS constitute the complete Environmental Impact Statement (“EIS”) for the Proposed Action under the State Environmental Quality Review Act (“SEQRA”) and its implementing regulations at 6 NYCRR Part 617 (“SEQR”).

The DEIS and FEIS are available for review or download online at <https://www.scwa.com/nfp/>. Hard copies are also available at the following five locations for in-person review during specified hours:

Suffolk County Water Authority Westhampton Building 624 Old Riverhead Road, Westhampton Beach, NY 11978 M-F 9:00 AM to 4:00 PM	Southold Free Library 53705 Main Road Southold, NY 11971 M-F 9:30 AM to 8:00 PM Sat 9:30 AM – 5:00 PM
Riverhead Public Library 330 Court Street Riverhead, NY 11901 M-Th 9:00 AM to 8:00 PM F-Sat 9:00 AM to 5:00 PM	Town of Riverhead Town Hall Office of the Town Clerk 4 West Main Street Riverhead, NY 11901 M-F 8:30 AM to 4:30 PM
Southold Town Hall Office of the Town Clerk 53095 Main Road Southold, NY 11971	

Once SCWA, as Lead Agency, accepts the FEIS as suitable for posting, public review, and agency distribution, a minimum 10-day FEIS consideration period must be provided before SCWA may prepare and adopt a SEQRA Statement of Findings and complete the environmental review process.

The purpose of this FEIS is to:

- Assemble all substantive verbal and written comments received from the public, public officials, local organizations, and involved and interested agencies during the designated

64-day DEIS public review and participation process. The DEIS public review process began on July 23, 2026, when SCWA accepted the DEIS as satisfying the scope and content requirements of the adopted Final Scope and 6 NYCRR 617.9(b). The initial written-comment deadline stated in the July 23, 2026, acceptance and hearing notice was September 11, 2026; the deadline was subsequently extended to Friday, September 25, 2026.

- Consider each substantive project-related question and comment entered into the record at the three public hearings for the project or submitted in writing during the posted written comment period.¹
- Identify any necessary revisions, amendments, or additional mitigation necessary for the project and SEQRA record.
- Demonstrate compliance with SEQRA processes and procedures as promulgated by its implementing legislation at 6 NYCRR Part 617.

This FEIS is part of the official record under SEQRA and the processes and procedures of the implementing regulations, with statutory authority and enabling legislation under Article 8 of the New York State Environmental Conservation Law (“ECL”).

1.2 Purpose of the Project

The purpose of the project is as follows:

1. Provide a long-term solution to the limited supply of potable drinking water on the North Fork by supplementing the existing SCWA system with water sources and infrastructure that will reduce impacts related to saltwater intrusion and, over time, replenish and rehabilitate the local aquifer system with the fresh water to be conveyed to the area from the South Shore Low Pressure Zone.
2. Deliver clean, high-quality drinking water from a large-volume, deep recharge area with good to excellent water quality that is less affected by, and less vulnerable to, elevated concentrations of nitrates, chloride associated with saltwater intrusion, “forever chemicals” such as per- and polyfluoroalkyl substances (PFAS), and other emerging human-made contaminants.
3. Create a substantial interconnection between the Southold water system and the SCWA distribution system to the west, thereby increasing overall system reliability.

¹ The SEQR Handbook, Fourth Edition (2020, page 135) states that “[t]he lead agency must respond to substantive comments. General statements of objection or support should be noted in the comment summary but need no response. The lead agency may choose to group comments by topic, and respond only once for each topic, so that responses in the final EIS are not repetitive. Comments do not need to be responded to individually or in order of their receipt.”

4. Provide a sufficient quantity of high-quality potable water to all current and future SCWA customers within the Town of Southold with minimal impacts on the aquifer system underlying the Town.
5. Ensure a suitable volume of potable water and water pressure for firefighting and domestic use.
6. Offset future capital costs of purchasing land and developing multiple smaller well fields that will in all likelihood require elaborate treatment systems to remove contaminants.
7. Reduce the costs associated with maintaining numerous low-capacity wells, and in some cases curtail their use or take well fields threatened by chloride contamination offline.

1.3 Project Description

SCWA is evaluating a new water main extension from suitable and reliable drinking-water sources with existing permitted capacity in SCWA's South Shore Low Pressure Zone to the Town of Southold. The project is intended to improve supply to the existing service area through the Riverside/Flanders to Jamesport/Laurel transmission main (Phase 1) and to support long-range planning for a possible future East Marion to Orient water main extension (Phase 2). Phase 2 would provide long-range planning for a possible future water main extension to serve residential and non-residential premises in the Hamlet of Orient that are experiencing private-well contamination issues

The DEIS examined three possible transmission routes, with particular emphasis on the route identified in the DEIS as the "Proposed Action" (Cross River Drive to Northville Turnpike to Sound Avenue to the Riverhead-Southold Town line) and the "Preferred Alternative" (Cross River Drive to Main Road to the Riverhead-Southold Town line). These routes are described in greater detail below.

1.3.1 Proposed Action Routing

Phase 1: *Riverside-Flanders to Jamesport-Laurel Water Main Extension:* Installation of approximately 43,449± linear feet (LF) (8.23± miles) of 24-inch diameter ductile iron transmission water main within existing street and highway rights-of-way (ROWs) beginning at the intersection of Flanders Road (SR 24) and Cross River Drive (CR 105) between the Hamlets of Riverside and Flanders in the Town of Southampton where it will connect to an existing SCWA distribution main. The main would then proceed north mainly along the shoulder of Cross River Drive (CR 105), then under the Peconic River Estuary using directional drilling, and north along Cross River Drive in the Town of Riverhead over a total of 3.8± miles until its intersection with Northville Turnpike (CR 43).

From there, the proposed water main would extend 0.54± miles to the northeast within Northville Turnpike to the intersection of Northville Turnpike and Sound Avenue. It would then continue east (2.42± miles) along Sound Avenue within Riverhead (both within the roadway and the roadway shoulder) to Pier Avenue and a proposed booster station site located 200+ feet north of the intersection of Sound Avenue and Pier Avenue. The booster station property under this scenario is a vacant 1.53-acre previously partially cleared and disturbed SCWA-owned property identified as Suffolk County Tax Map: District 600; Section 8; Block 3; Lot 1.9.

Continuing south from the previously Proposed Action's Pier Avenue booster station site, the main will then run east along Sound Avenue a distance of 1.47± miles to a point 397± feet (0.075± miles) east of the Sound Avenue - Jamesport Wellfield and Pump Station driveway that is over the Town of Riverhead - Town of Southold municipal line in Jamesport-Laurel, where it will connect to an existing 16-inch SCWA Distribution Area 30 service main.

The proposed Riverside/Flanders to Jamesport/Laurel main will convey water at a rate of up to 6,000 gallons per minute (gpm). A total of 3,322± LF (0.63± miles) of the main will be installed using directional drilling, including 1,951± LF of high-density polyethylene (HDPE) pipe installed beneath the Peconic River, 1,201± LF of HDPE pipe beneath the Long Island Railroad and Hubbard Avenue, and 171± LF of HDPE pipe beneath the Cross River Drive-Main Road intersection. Approximately 7.60 miles of ductile iron pipe will be installed and backfilled by open-cut trenching. See attached to the DEIS Proposed Action Water Main Installation Plans (**Attachment 1A-1D**), **Location Maps (Figures 1-1 A-D)**, and **Aerial Photographs (Figures 1-2 A-D)**.

Phase 2: East Marion to Orient Water Main Extension: Phase 2 involves long-range planning for a possible future 30,723± linear-foot (5.82-mile) water main extension consisting of a combination of 6-, 8-, and 12-inch diameter water mains between East Marion and Orient Hamlet in the Town of Southold. This possible future phase of the project would serve residential and non-residential premises in the Hamlet of Orient, along Main Road and to the south of Sound Avenue along the east shore of Orient Harbor as shown on the attached aerial photographs (Figures 2-1 and 2-2 of the DEIS). This improvement would extend east along Main Road (SR 25) from East Marion, just west of Dam Pond, a distance of 2.1± miles to the intersection of Platt Road, then south along Platt Road and along all or parts of several streets in this neighborhood. These streets are identified as Oyster Ponds Lane, Village Lane, Orchard Street, Navy Street, West Bay Avenue, King Street, Vincent Street, Willow Street, Fletcher Street, Skippers Lane, Harbor River Road, Tabor Road, Old Farm Road, Majors Pond Path, Willow Terrace Lane, Halyoke Avenue, and Platt Road.

An estimated 1,205± linear feet of the East Marion to Orient main will be installed underground by directional drilling, and the remainder (29,518± linear feet) will be installed by open trenching. The 1,205± feet of directional drill area includes one 445-foot section along Sound Avenue in East

Marion; two 200-foot sections beneath culverts along Main Road; 95± linear feet at the intersection of Main Road and Oyster Ponds Lane; 85± feet at the intersection of Main Road and Village Lane; 90± linear feet at the intersection of Main Road and Tabor Road; and 90± linear feet at the intersection of Main Road and Platt Road. Peak flow is estimated to be 250 gpm.

See attached to the *DEIS* the **Proposed Action Water Main Installation Plans (Attachment 1E), Location Maps (Figures 1-1 E) and Aerial Photographs (Figures 1-2 E).**

1.3.2 Preferred Alternative Routing

Phase 1: Phase 1 of the “Preferred Alternative” involves a project designed to meet the same goals as the Proposed Action but over a shorter, more direct route through the Town of Riverhead by utilizing Main Road (SR 25) in Riverhead rather than Northville Turnpike and Sound Avenue to reach the Riverhead/Southold Town line. This route also involves use of County and State roads for the Riverside/Flanders to Jamesport/Laurel transmission main, together with the off-road Preferred Alternative booster-station site (Phase I) as described below.

As with the Proposed Action, the Preferred Alternative would begin in the Town of Southampton at the Riverside/Flanders hamlet boundary by connecting a 24-inch diameter ductile iron pipe (DIP) to an existing 36-inch diameter SCWA DIP dry main located on Cross River Drive 50± feet north of the Flanders Road (SR 24)/Cross River Drive (CR 105) intersection. The route would continue north along Cross River Drive (CR 105), be directed under the Peconic River Estuary adjacent to the bridge using directional drilling, and continue north along Cross River Drive in the Town of Riverhead, similar to the Proposed Action. Rather than continuing underneath the Cross River Drive-Main Road intersection using directional drilling and heading northwest toward Northville Turnpike as planned for the Proposed Action, the Preferred Alternative route, at a distance of 305± feet south of the intersection of Cross River Drive-Main Road, would turn in a northeasterly direction from the Cross River Drive shoulder and enter an undeveloped, sparsely vegetated SCWA-owned property (hereafter the “Preferred Alternative booster station site”). This property is 0.27± acres and is located at the southeast corner of the intersection of Cross River Drive and Main Road (SCTM No: SCWA 600-85-2-112) and has access from Main Road via a flag strip. Here, the main would enter the rear of a proposed 765± SF booster station and exit out the front and continue north down an existing driveway within the flag strip to Main Road.

At the north end of the booster station property’s driveway, the Preferred Alternative water main would be directionally drilled under Main Road using HDPE pipe from south to north via temporary entry and exit pits on each side of the road as shown on the Preferred Alternative Plans. From there, the Preferred Alternative DIP water main would continue in an easterly direction along the north side of Main Road a distance of 26,049± feet (4.93 miles) to a point

235± feet west of the intersection of Franklinville Road and Main Road, where it will connect to an existing 16-inch DIP owned and operated by SCWA and conveyed to the starting point of the proposed East Marion to Orient route. The total length of pipe to be installed along this route from the Riverside/Flanders line near Flanders Road to Laurel would therefore be 37,872± linear feet or 7.172 miles, which is 5,577± feet or 1.057 miles shorter than that of the Proposed Action's Phase 1 Riverside/Flanders to Jamesport/ Laurel route.

See DEIS **Figures 5.1-1, 5.1-2** and its **Preferred Alternative Water Main Installation Plans** for details (**Attachment 2A, Riverside/Flanders to Laurel and Attachment 1E, East Marion to Orient**).

Phase 2: The East Marion to Orient Water Main Extension route is identical under both the Proposed Action and Preferred Alternative.

1.3.3 DEIS Preliminary Conclusions and Considerations in Route Choice

According to the SCWA's Hydrogeologic Analysis and Route Evaluation report (see Appendix B of the *DEIS*), the Preferred Alternative is the best route based on the hydraulics of the three routes, including water pressure, conveyance, head loss, and water age. The elevation of Main Road in Riverhead is lower (maximum elevation of approximately 35 feet) than the previous Proposed Action. Of significance is that if SCWA selects the Sound Avenue (Proposed Action) route, water would have to be pumped from elevation five feet at the origin in Flanders to an elevation of approximately 70 feet as the main continues north to Northville Turnpike and east along Sound Avenue. The Proposed Action Booster Station is also located the farthest away, causing significant pressure loss between the origin and the booster station. To hydraulically achieve the Proposed Action routing, a second booster pump was determined to be necessary, or the main would have to be upsized to a 36-inch diameter pipe. The larger pipe size, however, results in a higher water age and a resulting negative effect. The second booster station would be located at the intersection of Main Road and County Road 105 in Riverhead.

Conversely, the elevations along Main Road do not exceed elevation 35 feet, which eliminates the need for a second booster station, and it is a shorter route that has the benefit of reducing the age of water in the main. Excessive water age is problematic in pipe design because it causes the breakdown of vital disinfectants, promotes harmful bacterial growth and biofilms, increases disinfection byproducts (DBPs), worsens pipe corrosion, and can impact water taste and color.

According to the DEIS, the portion of the Preferred Alternative route along Main Road also has wider paved and unpaved shoulders as compared to Sound Avenue (Proposed Action), especially along the north side of the Main Road. This extra space provides more room for construction and staging, improved traffic flow, and greater worker and public safety.

There are many historic resources along Main Road in Riverhead along the Preferred Alternative route, but review and analysis by TRACKER Archaeology and NYS OPRHP during DEIS preparation found that there would be no effect, subject to any suitable precautionary mitigation measures near sensitive resources, if needed. The Proposed Action's Sound Avenue section of roadway is also located along a State-designated Scenic and Historic roadway, which raised concerns during preliminary review. However, the archaeologist and OPRHP also found that significant impacts to these resources are unlikely. Moreover, scenic impacts would be minimal if there were any impact at all during installation and nonexistent once the main is installed underground and disturbed areas are paved, reseeded and/or restored.

The Preferred Alternative is expected to cost more because of nighttime construction and roadway-restoration requirements, and it would affect more driveways and one additional intersecting road than the Proposed Action's Sound Avenue route. The DEIS nevertheless identified hydraulic, operational, safety, and water-quality advantages that support its preliminary selection or focus on the Preferred Alternative for Phase 1. Accordingly, the DEIS provides supplemental discussion of the Preferred Alternative following applicable analyses of the Proposed Action, and the FEIS focuses on the Preferred Alternative where route-specific analysis is required. The Preferred Alternative is also discussed in **Section 1.5** of the DEIS and analyzed in detail in **Section 5, Alternatives**, including comparisons with the Proposed Action and other assessed alternatives.

Mitigation measures and best management practices identified for the Proposed Action throughout the DEIS also apply to the Preferred Alternative. However, some measures and practices were modified or enhanced, as necessary, to meet the specific needs of the Preferred Alternative route and ensure that potential impacts would be mitigated to the maximum extent practicable, as required by SEQRA.

1.4 SEQRA Process

1.4.1 Preparation of an Environmental Assessment Form, Lead Agency Coordination and Adoption of a SEQRA Positive Declaration

On August 5, 2024, SCWA, with assistance from environmental consultants Nelson, Pope and Voorhis ("NPV"), mailed a cover letter, a copy of the full EAF Part 1 dated July 29, 2024, and EAF Part 1 text attachment dated July 30, 2024, to all potentially involved and interested agencies. The materials were sent by certified mail to document delivery and receipt, to commence lead agency coordination. During this process, the Town of Riverhead and the Town of Southold submitted letters expressing interest in becoming Lead Agency or sharing the Lead Agency role, dated August 29, 2024, and September 4, 2024, respectively. Under SEQRA, disputes over lead agency designation are resolved by the NYSDEC Commissioner. The Town of Riverhead therefore

referred the dispute to NYSDEC's Interim Commissioner, Sean Mahar, to determine the most appropriate agency to oversee the SEQRA review and serve as Lead Agency. On November 14, 2024, the Interim Commissioner applied the three criteria in 6 NYCRR 617.6(b)(5)(v) and designated SCWA as the agency to lead the SEQRA review for the proposed project.

On April 30, 2025, SCWA, with assistance from NPV, completed the Full Environmental Assessment Form ("EAF"), including a Part 1 text attachment and supporting figures. On May 6, 2025, the Full EAF Part 2, "Identification of Potential Impacts," and Part 3, "Determination of Significance," were prepared. On May 9, 2025, SCWA's delegated responsible officer, Chief Executive Officer Szabo, reviewed and signed the Determination of Significance, finding that the Proposed Action may result in one or more significant adverse environmental impacts. Accordingly, SCWA determined that a Positive Declaration was required, a DEIS must be prepared to further assess impact(s), and that mitigation measures and project alternatives must be evaluated to avoid or reduce impacts to the maximum extent practicable. SCWA then determined that a Notice of Positive Declaration, Draft Scope, and scheduling of a public scoping session must be prepared and published in the NYSDEC's Environmental Notice Bulletin (ENB). Applicable SEQRA documents were then filed and posted, making them available to the public and all involved and interested agencies at three filing locations and online at SCWA's official website. Required notices were also distributed and published in local newspapers to inform the public of the scoping process and the time, date, and location of the scoping session.

1.4.2 Scoping

Under current SEQRA regulations, the scope and content of all EISs, except Supplemental EISs, must be guided by a formal public scoping process and written scoping document to ensure that issues of environmental concern are adequately considered and addressed and that the review is focused on those issues of concern. A "Draft Scope" was prepared by SCWA and project environmental consultants, NPV, and made available to begin the formal scoping process as required under 6 NYCRR Part 617.8. As noted above, a Notice of Positive Declaration, Draft Scope, and Scheduling of a Public Scoping Session were prepared, and the required notices were published by the NYSDEC ENB and by:

- *Newsday* on May 15, 2025 and June 5, 2025;
- *Riverhead News-Review* on May 15, 2025 and June 5, 2025; and
- *The Suffolk Times* on May 15, 2025.

The Draft Scope was made available for public review online at SCWA's official website.² and in paper copy at Suffolk County Water Authority's Westhampton Building, the Riverhead Public

² www.scwa.com/nfp

Library, and Floyd Memorial Public Library in Greenport. Contact information was also provided, including contact name, mailing address, telephone number, and email for anyone with questions on the matter or who wanted to submit comments on the required DEIS's scope and content.

The Draft Scope for the DEIS was prepared by NPV on behalf of and with input from SCWA, and was guided by project- and site-specific environmental information contained in the Environmental Assessment Form (EAF) Parts 1, 2 and 3/ Determination of Significance, the adopted Positive Declaration, and SEQR Section 617.8, "Scoping."

Scoping sessions were held on June 4, 2025, at the SCWA building in Westhampton Beach; June 10, 2025, at the Riverhead Library in downtown Riverhead; and on June 12, 2025, at the Southold Town Recreation Center in Peconic in the Town of Southold.

An extended written scoping comment period was provided to allow the public and involved and interested agencies additional time to consider the subject action and submit comments on the necessary scope and content of the DEIS. The original written comment period for the DEIS scope was scheduled to close on June 29, 2025. However, the period was extended from the initial closing date to July 11, 2025. At the request of the Town of Riverhead, the written comment period was extended once again to August 4, 2025, providing over two months from the time the Draft Scope was accepted and filed by the Lead Agency and the close of the written comment period.

A total of 18 federal, state, regional, county, and local agencies and seven local non-agency private organizations were sent notices indicating that a Positive Declaration had been filed by the State-delegated Lead Agency under SEQRA, the dates, times, places, and ways by which the EAF Parts 1, 2, and 3 and Draft Scope could be reviewed, and the dates, times, and locations for the three public scoping sessions and end of the written comment period. SCWA contact information for submission of written comments was also provided, including contact name, mailing address, email address, and telephone number. SCWA also made it possible for comments to be submitted on its official website on the project link.

The scope and content of the Final Scope were also guided by verbal and written comments and questions received from involved and interested agencies, local organizations, and the general public during initial agency coordination and outreach and the three duly advertised public scoping sessions. The Draft Scope was revised and amended in accordance with the standards and requirements of 6 NYCRR Part 617 State Environmental Quality Review (SEQR) §617.8 "Scoping" and §617.9(b) "Environmental impact statement content" and the Final Scope was approved by SCWA on October 22, 2025, as an appropriate instrument to guide the scope and content of the DEIS.

1.4.3 Preparation and Acceptance of Draft EIS and Scheduling of Public Hearings

A DEIS was prepared based on the approved Final Scope and SEQR standards and procedures. At the same time, SCWA prepared a comprehensive Final Hydrogeologic Analysis and Route Evaluation report, with assistance from area hydrogeologic experts, CDM-Smith, to provide additional technical and scientific analyses and the Final Hydrogeologic Analysis and Route Evaluation was completed and incorporated into the DEIS. On July 23, 2026, SCWA determined that the DEIS adequately analyzed the identified impacts and satisfied the scope and content requirements of the adopted Positive Declaration, approved Final Scope, and the standards of 6 NYCRR Section 617.9(b), “Environmental impact statement content” of SEQR. SCWA then accepted the DEIS as complete. Notices of DEIS acceptance and of the three scheduled public hearings were distributed to involved and interested agencies by certified mail; published in the NYSDEC Environmental Notice Bulletin and three local or regional *newspapers* (*Newsday*, *The Suffolk Times*, and *The Riverhead-News Review*); and mailed in English and Spanish to landowners along the Preferred Alternative route. The DEIS and hearing information were posted on SCWA’s website (<https://www.scwa.com/nfp/>) and made available at the following locations during the noted days and times.

Suffolk County Water Authority

Westhampton Building
624 Old Riverhead Road,
Westhampton Beach, NY 11978
M-F 9:00 AM to 4:00 PM

Southold Free Library

53705 Main Road,
Southold, NY 11971
M-F 9:30 AM to 8:00 PM
Sat 9:30 AM – 5:00 PM

Riverhead Public Library

330 Court Street
Riverhead, NY 11901
M-Th 9:00 AM to 8:00 PM
F-Sat 9:00 AM to 5:00 PM

Following the distribution, posting, and notice, and the required minimum public review period, the three public hearings were held according to the following schedule:

Wednesday, August 19, 2026

Suffolk County Water Authority
Westhampton Building
624 Old Riverhead Road,
Westhampton Beach, NY 11978
Time: 6:00 PM

Thursday, August 20, 2026

Southold Recreation Center
970 Peconic Lane
Peconic, NY 11958
Time: 5:00 PM

Wednesday, August 26, 2026

Riverhead Public Library
330 Court Street
Riverhead, NY 11901
Time: 4:30 PM

SCWA and its environmental consultants provided a *PowerPoint* presentation at each of the three public hearings to provide necessary project background and maps, explain the environmental review process and public hearing procedures, and provide important information about SCWA, the Proposed Action, and the overall content of the DEIS. After each presentation, the hearing was opened for public comment. A stenographer documented all comments, questions, and dialogue entered into the record, so that they were accurately transcribed and documented and

properly responded to in the FEIS. Upon completion of each public presentation and hearing, SCWA again provided contact information and the deadline for submitting written comments.

The written comment period was originally scheduled to end on September 11, 2026, as stated in the July 23, 2026 acceptance and hearing notice, and was later extended to September 25, 2026.

1.4.4 Final Environmental Impact Statement

Acceptance of this FEIS represents the penultimate step in the SEQRA review process and, together with the DEIS, provides the basis from which SCWA, as Lead Agency under SEQRA, will prepare its final “Statement of Findings.” The FEIS identifies and addresses all substantive verbal and written comments received from the public and involved and interested agencies during the public review and written comment period, including comments entered into the record verbally at the August 19, 2026 public hearing in the Town of Southampton, the August 20, 2026 public hearing in the Town of Southold, and the August 26, 2026 public hearing in the Town of Riverhead. Originally, the written comment period was scheduled to end on September 11, 2026 or 50 days after the July 23, 2026 DEIS acceptance and filing. However, at the request of members of the public, the comment period was extended an additional 14 days (two weeks) to September 25, 2026. Overall, the public comment period was open for a period of 64 days or over nine weeks, more than doubling SEQRA’s 30-day written comment period requirement.

This FEIS also provides the public and involved and interested agencies with the following essential information:

- descriptive information about the proposal under review;
- documentation of the SEQRA process and the Proposed Action’s consistency with that process;
- a summary of written and verbal comments received during the designated public review and comment period;
- the source and manner of delivery of each comment (i.e., verbal comments during the hearing, or letter, memo, email, petition, online submission, etc.);
- responses to all substantive comments received during the designated public review phase;
- any necessary corrections, amendments or modifications to the Action and/or DEIS;
- additional analysis of the Action’s potential environmental effects; and
- any plausible techniques and strategies identified to further mitigate impacts to the maximum extent practicable.

In addition, all information contained in the previously vetted and accepted DEIS, including all text, figures, diagrams, simulations, mathematical or numeric determinations, maps, plans,

tables, and appendices, is incorporated by reference. The FEIS also explains how to access the full DEIS for review, as required by SEQRA. Both the DEIS and this FEIS were prepared in accordance with SEQRA and its implementing regulations at 6 NYCRR Part 617.

Following filing of the Notice of Completion of the FEIS, SCWA must provide a reasonable public and agency consideration period of at least 10 calendar days before issuing its written findings statement and making its decision, subject to 6 NYCRR 617.11.

1.4.5 Findings Statement

Once the public and agency FEIS consideration period has lapsed, SCWA, as the duly designated Lead Agency, will issue a written SEQRA findings statement or “Findings Statement.” A Findings Statement is a written document that outlines the SEQRA process, certifies that all applicable SEQRA standards and procedures have been followed and achieved, and identifies the environmental, social, and economic considerations weighed in rendering a decision to approve or disapprove the Proposed Action. The Findings Statement also identifies impacts, required mitigation measures, alternatives considered, and the reasoning behind the final decision.

1.4.6 Monroe Balancing Test for Qualified Immunity

During the initial environmental review, a second dispute arose regarding whether SCWA is subject to local municipal zoning and land use regulations when installing water mains within public rights-of-way and constructing booster stations on SCWA-owned land, or whether SCWA is entitled to qualified immunity.

New York Courts have held that when one governmental entity is conducting land use activities in another jurisdiction, it may be entitled to qualified immunity. Following the close of the public scoping session and comment period on the draft scope, the Town of Riverhead authorized a public hearing on August 19, 2025 for the purpose of undertaking the “Monroe Balancing Test” pursuant to the decision in *Matter of County of Monroe v. City of Rochester*, 72 N.Y.2d 338 (1988) to determine whether, and to what extent, the Project shall be exempt from Riverhead’s zoning and land use regulations. SCWA then duly noticed and held its own public hearings on October 7, 8, and 9, 2025 concerning its immunity from local zoning under Monroe. Comments were received from the Town Supervisor of the Town of Southold, the Town Supervisor for the Town of Riverhead, Town Board members from the Towns of Riverhead and Southold, and residents of the Towns of Riverhead and Southold. While SCWA was holding its public hearings concerning its immunity from local zoning, Riverhead Town adopted a resolution on October 7, 2025, finding that SCWA and the Project were not immune from the Town’s zoning and land use laws and regulations.

Based on written and verbal input received at the three public hearings, prior precedent, and SCWA’s evaluation of the nine factors under the Monroe Balancing Test, SCWA determined by

Resolution dated November 20, 2025, that the activities were immune from local municipal jurisdiction under SCWA's application of the Monroe balancing test. See Appendix C of the DEIS for the detailed assessment and SCWA's final Monroe Determination.

On February 6, 2026, SCWA commenced a hybrid special proceeding pursuant to Article 78 of the Civil Practice Law & Rules (CPLR) and a declaratory judgment action pursuant to CPLR §3001 for a judgment declaring the Project is immune from the zoning and land use laws and regulations of the Town of Riverhead.

The hybrid Article 78 proceeding and declaratory judgment action are still pending. The FEIS reflects the current status of that litigation based on information available as of the date of FEIS acceptance.

1.5 Organization of this Document

The appendices preserve the comments received during DEIS review, while **Section 2.0** presents the substantive comments and SCWA's responses. **Appendix A** contains transcripts of the three public hearings: August 19, 2026, at SCWA's Westhampton Building (**Appendix A-1**); August 20, 2026, at the Southold Recreation Center (**Appendix A-2**); and August 26, 2026, at the Riverhead Public Library (**Appendix A-3**). **Appendix B** contains written comments, including letters, emails, public postings on SCWA's website, and correspondence from involved and interested agencies. **Appendix B-1** contains comments from agencies and public officials; **Appendix B-2** contains comments from the general public. As required by SEQRA, only comments that are substantive and relevant to the Proposed Action merit a response.

Section 2.0 summarizes all relevant and substantive written and verbal comments on the DEIS and the project that were received from the public, local civic groups, local organizations, and involved and interested agencies and offices during the designated comment period.

Comments that are directed toward the content, scope, subject matter, information, data, tables, figures, analyses, rationale, conclusions, procedures, or other substantive aspects of the DEIS (e.g., impacts, mitigations, and alternatives) or the plans and documents comprising the Proposed Action are considered "substantive" and are responded to in **Section 2**. General statements that express only opposition or support for the Action without elaboration are noted. A response may be provided for such statements but is not required. Comments are grouped by general topic consistent with the order the topic appeared in the DEIS and to prevent unnecessary redundancy and provide more detailed responses to issues of most concern.

Each substantive comment or question appearing in a hearing transcript or written correspondence was delineated, identified, and assigned a comment code based on the

speaker's, author's, group's, or agency's initials, and the order in which the comment or question was presented. The coding system allows reviewers to identify the commenter, locate the relevant appendix, and cross-reference the corresponding response in **Section 2.0**.

Table 1-1 below lists the speakers recorded at each of the three public hearings in chronological order. For each appearance, the table provides the speaker's name as stated in the transcript, the speaker's agency organizational affiliation or residency, the assigned speaker identification code or code range, the applicable transcript appendix, and the number of substantive comments or questions identified. Identification codes consist of the hearing identifier (H1 Westhampton, H2 Southold, and H3 Riverhead) followed by the speaker's initials and comment or question number in the order received. To facilitate cross-referencing, the section of the FEIS in which a comment or question is addressed is also provided in the left margin of the respective hearing transcript (**Appendix A-1, A-2 or A-3**) next to the original comment or question.

Table 1-2 lists the written correspondence received by the Lead Agency from DEIS acceptance through the close of the extended written comment period. For each correspondence, the table identifies the author, affiliation, or residency status, date of correspondence, assigned comment code, and number of comments submitted into the record by the author. Each written-comment code begins with "W," followed by initials identifying the author or organization and the number assigned to each comment or question in the order presented. To facilitate cross-referencing, the applicable FEIS response section is identified in the margin next to the written comment in **Appendix B**.

Table 1-1
VERBAL COMMENTS RECEIVED AT PUBLIC HEARINGS
AUGUST 19, 20, AND 26, 2026

Total Speakers	Name (Per Transcript)	Planning Board Member, Resident, Agency or Organization	Speaker ID Codes	Transcript Appendix	Total Comments
<i>Hearing 1 August 19, 2026 Public Hearing at SCWA Westhampton Office Building (H1)</i>					
1	Greg Doroski	Legislator, District 1	H1GD-1—H1GD-12	A-1	12
<i>Hearing 2: August 20, 2026 Public Hearing at Southold Recreation Center (H2)</i>					
1	Greg Doroski	Legislator, District 1	H2GD-1—H2GD-3	A-2	3
2	Al Krupski, Jr.	Southold Town Supervisor	H2AK-1— H2AK-6	A-2	6
3	Brian Mealy	Southold Town Councilman	H2BM-1— H2BM-5	A-2	5
4	Nick Krupski	Southold Town Trustee	H2NK-1— H2NK 4	A-2	4
5	Eric Sepenoski	Southold Town Trustee	H2ES-1— H2ES 4	A-2	4

Total Speakers	Name (Per Transcript)	Planning Board Member, Resident, Agency or Organization	Speaker ID Codes	Transcript Appendix	Total Comments
6	Kevin Stuessi	Village of Greenport Mayor	H2KS-1 — H2KS13	A-2	13
7	Patrick Brennan	Greenport Deputy Mayor	H2PB-1 — H2PB-6	A-2	6
8	Anne Murray	East Marion Resident Southold Land Use Coordinator for North Fork Environmental Council	H2AM-1 — H2AM-2	A-2	2
9	Joel Klein	Resident	H2JK-1 — H2JK-6	A-2	6
10	Nancy DePAS Reinertsen	Chair of Re-Wild Long Island, North Fork	H2DR-1 — H2DR-2	A-2	2
11	Ralph Reinertsen	Chair of Re-Wild Long Island, North Fork	H2RR-1	A-2	1
12	Alexa Annunziata	Southold Resident, Director of Outreach for the Peconic Bay Keeper, Southold Conservation Advisory	H2AA-1 — H2AA-3	A-2	3
13	Margaret De Cruz	Greenport Resident, Board of North Fork Environmental Council	H2MDC-1—H2MDC- 4	A-2	4
14	Valerie Virgone	Peconic Estuary Partnership	H2VV-1 — H2VV-3	A-2	3
15	Caroline Gates	Water Advisory Committee	H2CG-1	A-2	1
<i>Hearing 3 August 26, 2026 Public Hearing at Riverhead Public Library (H3)</i>					
1	Frank Mancini	Superintendent of the Riverhead Water District	H3FM-1 — H3FM-2	A-3	2
2	Joyce Novak	Director of Peconic Bay National Estuary Program	H3JN-1 — H3JN-4	A-3	4
3	Mike Foley	Resident of Reeves Park	H3MF-1 — H3MF-2	A-3	2
4	Kathleen Courtnee	Aquebogue Resident	H3KC-1 — H3KC-2	A-3	2
5	Barbara Blass	Jamesport Resident	H3BB-1 — H3BB-14	A-3	14
6	Benja Schwartz	Cutchogue Resident	H3BS-1 — H3BS-6	A-3	6

Total Speakers	Name (Per Transcript)	Planning Board Member, Resident, Agency or Organization	Speaker ID Codes	Transcript Appendix	Total Comments
7	Ken Rothwell	Riverhead Town Councilman	H3KR-1 — H3KR-3	A-3	3
8	Mark Wooley	Riverhead Resident	H3MW-1 — H3MW-9	A-3	9
9	Kathy Krueel	Flanders Resident	H3KK-1— H3KK-5	A-3	5
10	Greg Doroski	Legislator, District 1	H3GD-1— H3GD-3	A-3	3
11	Rob Summerlin	Resident	H3RS-1 — H3RS-7	A3	7
12	Jerry Halpin	Town of Riverhead Town Supervisor	H3JH-1— H3JH-16	A3	16
13	Jeff Seeman Certified Environmental Professional	Town of Riverhead Environmental Consultant	H3JS-1 — H3JS-10	A3	10
29	TOTAL				158

Based on **Table 1-1** and the three public hearing transcripts, 27 unique individuals commented on the Proposed Action. One individual spoke at all three hearings, resulting in 29 total speaking appearances and 158 comments or questions concerning the project and DEIS. Commenters included local residents, representatives of local organizations, public officials, legislators, and agency representatives. All substantive verbal comments and questions are addressed or acknowledged in **Section 2.0** of this FEIS and can be cross-referenced using the speaker identification codes and transcript appendix numbers provided in the table.

Table 1-2
WRITTEN COMMENTS RECEIVED
July 23, 2026 — September 25, 2026

Total Speakers	Author	Affiliation/Agency/Title/ Residency	Date of Letter ⁽¹⁾	Written Comments Codes	Total Comments
<i>Public Official and Involved or Interested Agency Comments</i>					
1	M.T Vijayendran, P.E.	New York State Department of Transportation	08/07/26	WDOT-1	1
2	Erik C. Howard, Town Attorney	Town of Riverhead	08/13/26	WEH-1	1
3	Jeffrey L. Seeman, Certified Environmental Professional	Town of Riverhead Environmental Consultant	08/26/26	WJS-1 — WJS-50	50
4	Kenneth Rothwell	Riverhead Town Council	08/26/26	WKR-1	1

Total Speakers	Author	Affiliation/Agency/Title/Residency	Date of Letter ⁽¹⁾	Written Comments Codes	Total Comments
5	Southold Town Board of Trustees	Southold Town Board of Trustees	09/23/26	WST-1 — WST-5	5
6	Albert J. Krupski, Jr.	Southold Town Supervisor	09/25/26	WAK-1 — WAK-13	13
<i>Local Resident, Land or Business Owner, Local Organizations and General Public Comments</i>					
7	Robert Bocksel	Riverhead Resident	08/10/26	WRB-1	1
8	Rosemary McKinley	Southold Resident	08/20/26	WRM-1 — WRM-3	3
9	Nancy Butkus	Southold Resident	08/22/26	WNB-1	1
10	Barbara Blass	Jamesport	08/26/26	WBB-1 — WBB-9	9
11	Stanley J. Carey Superintendent of Water & Sewer Garden City	Former RWD and SCWA employee, Former Chairman for LI Water Commission and LI Commission for Aquifer Protection	08/26/26	WSC-1 — WSC-3	3
12	Greater Jamesport Civic Association	Greater Jamesport Civic Association	09/07/26	WGJC-1 — WGJC-4	4
13	Deborah Wetzell	Cutchogue Resident	09/23/26	WDW-1	1
14	Robert DeLuca, President	Group for the East End	09/24/26	WRD-1 — WRD-15	15
15	Suzanne Donovan	Greenport Resident	09/24/26	WSD-1 — WSD-2	2
16	Thomas Moore	Town of Southampton, Westhampton Beach Resident	09/24/26	WTM-1 — WTM-15	15
17	Janice Scherer Town Planning and Development Administrator	Town of Southampton Department of Land Management	09/25/26	WSLM-1 — WSLM-10	10
18	Jenna Schwerzmann	Town of Southampton Resident	09/25/26	WJSc-1	1
19	Alexa Annunziata	Southold Resident, Director of Outreach for the Peconic Bay Keeper, Southold Conservation Advisory	09/25/26	WAA-1 — WAA-3	3
20	Caroline Yates	Southold Water Advisory Committee	09/25/26	WCY-1 — WCY-6	6
20	TOTALS				145

Written correspondence from involved or interested agencies and public officials is provided in **Appendix B-1**. Correspondence from local residents, landowners, business owners, local organizations, and the general public is provided in **Appendix B-2**.

During the designated 64-day written comment period, SCWA received a total of 20 separate written correspondences, containing a total of 145 comments or questions. Five of the individuals who spoke at a hearing also submitted a written correspondence.

Combining the 158 comments or questions received during the three public hearings with the 145 comments or questions received during the 64-day written comment period, a total of 303 comments or questions were entered into the record. **Table 1-1** identifies 29 speaking appearances by 27 unique individuals since one individual spoke at all three hearings. **Table 1-2** records 20 written correspondences, five of which were submitted by individuals who also spoke at one of the public hearings. Accordingly, the hearing and correspondence records represent 42 unique individual or organizational commenters. Some comments submitted in writing were part of the author's presentation at a hearing, thereby duplicating those comments.

General Topics of Concern

The comments and questions received during the DEIS review addressed various topics but focused mostly on the following principal issues, presented in no particular order:

- **Water conservation** — The extent to which reductions in peak demand or storage could diminish the need for the proposed water main.
- **Project need** — The need for the proposed water main to provide a safe and reliable drinking-water supply and adequate fire protection based on the availability of other options such as conservation, additional storage, and others.
- **Routes and alternatives** — The basis for preferring the Main Road (Route 25) alignment over the Sound Avenue alignment, the need for a second booster station, and the possibility of other alternatives.
- **Groundwater impacts** — The potential effects of changes in pumping on aquifers, including groundwater drawdown, mounding, impacts to surface water bodies, and saltwater intrusion.
- **Jurisdiction and permits** — The implications of the Monroe determination for local zoning and the applicability of wetland and roadway-work approvals, applicability to the SEQRA review, and pending court decision.
- **Construction and traffic impacts** — The potential effects of construction on property access, schools, businesses, and emergency traffic.
- **Wetlands and habitat** — The adequacy of directional drilling mitigations and other construction practices to protect sensitive areas, the need for more site-specific analysis, and the need for input from municipal agencies.
- **Water quality and wastewater** — The potential effects of changes in pumping on contamination, including increased buildout, water use, and wastewater impacts.
- **Growth and cumulative effects** — The potential for expanded water service to induce development or contribute to cumulative impacts.
- **Utilities and resilience** — Measures to avoid conflicts with existing utilities and maintain water-main reliability during storms.

All substantive comments and questions identified in the hearing transcripts and written correspondence are addressed or acknowledged in **Section 2.0** of this FEIS and are identified by

comment code in the hearing transcripts and written correspondence. The comments and responses provide information for the Lead Agency and other involved agencies to consider when preparing Findings Statements and making informed decisions on the Proposed Action. Once SCWA accepts the FEIS and the required minimum 10-day public consideration period for the FEIS is set and lapses, SCWA, as Lead Agency, will issue its Statement of Findings to conclude the SEQRA process.

1.6 Project Modifications and/or Additional Mitigation Measures

Based on public comments received on the DEIS, SCWA identified the following additional project modifications, mitigation measures, and best construction and management practices. These commitments will be incorporated into the final SEQRA Findings Statement.

1. SCWA will maintain a real-time construction webpage on its official website with daily updates on work locations, construction progress, detours, contact information, and other essential project information.
2. SCWA will appoint a special construction manager/liaison to oversee daily construction activities and implementation of identified mitigation measures. The liaison will monitor work schedules and applicable construction and management practices; verify that wetland protections, golden nematode requirements, directional-drilling standards, and environmental safeguards are followed. The construction manager/liaison will also coordinate traffic controls, public safety measures, and additional precautions in school zones as needed depending on scheduling; facilitate access to owners, visitors or customers of abutting properties; and oversee the real-time public construction information and comments webpage.
3. As a clarification to comments made in the DEIS, all roadway work and restoration will be conducted in accordance with the final requirements of the applicable roadway permitting agency highway permits.

SECTION 2.0 COMMENTS AND RESPONSES

2.0 COMMENTS AND RESPONSES

This section provides responses to substantive project-related questions and comments received during the public hearings held on August 19, 20, and 26, 2026, and during the written public comment period from July 23 through September 25, 2026. Attendees included SCWA officials, environmental consultants, Town officials and trustees, County legislators, representatives of local civic and environmental organizations, and members of the general public, primarily local residents. A court reporter/notary public attended each hearing to document SCWA's project presentation, identify each speaker, and transcribe all comments, questions, and other dialogue entered into the record.

Project-related questions and comments are grouped by topic in the general order in which the corresponding subjects appear in the DEIS. To reduce repetition and support direct, substantive responses, related comments may be excerpted, summarized, or consolidated without changing their underlying meaning. General statements of support or opposition that do not identify a substantive issue, and comments that agree or disagree with the DEIS analyses without explanation, may be acknowledged without further response.

The Westhampton–Southampton public hearing transcript is provided in **Appendix A-1**, the Orient–Southold hearing transcript in **Appendix A-2**, and the Riverhead hearing transcript in **Appendix A-3**. Written correspondence received during the DEIS review period from involved and interested agencies, local and regional officials, local organizations, and the general public is provided in **Appendix B**. Together, the hearing transcripts and written comments submitted by letter, memorandum, email, and messaging through SCWA's project webpage constitute the full record of DEIS comments for the FEIS.

Comments and questions entered into the record are provided below followed by SCWA's responses.

2.1 Project Background, Public Need, Project Sponsor Objectives and Benefits

Comments WSC-2, WRM-1: 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 or quantity issues typically encountered on the North Fork. This is one of the purposes of the Long Island Pine Barrens Protection Act of 1993. Water is a commodity in this area of Long Island, especially in the summer, because of the influx of the summer population when demand increases.

Response: Comment acknowledged. As described in Section 1.5 of the DEIS, the project is intended to provide safe and reliable public drinking water, adequate system pressure, and improved reliability for domestic, commercial, and emergency needs. To serve those purposes, the project would increase pumping at 33 existing source wells in the South Shore Low Pressure Zone, within their permitted capacities, while reducing reliance on wells in the Southold Low Pressure Zone. The environmental review evaluates the resulting changes in pumping and recharge, together with construction and operational effects. The project's relationship to the Central Pine Barrens is addressed in the main body and Appendix B of the DEIS.

Comments H2KS-1, H2KS-2, H2KS-3, H2KS-4, H2KS-5, H2KS-6, H2KS-7, H2KS-8, H2KS-9, H2KS-10, H2KS-11, H2KS-13: I personally do not believe we have the time to wait on this very important issue, as it relates to bringing needed, clean water out to the North Fork.

Within the one-mile confines of the Village of Greenport, we are a historic-working waterfront community with houses on average that are approximately a hundred years old. We have a multitude of commercial buildings on the water fronts which are all of significant age, too. And all these buildings are close together; I could stick my hand out the window and my neighbor, can stick her hand out and we could pass sugar across the fence if we want to. This is the same thing in virtually every part of the Village.

One of the most significant needs of water isn't just to take a shower, bathe your dog, drink some water; it's also for emergency services. And as the Village Mayor, the Greenport Village Fire Department reports to our Board. When I see that tower that you guys had up on the screen a little earlier and know that there are times when there's only five feet or two feet of water in it, that is an emergency we cannot afford to delay. By delaying this decision, you would be putting at risk every single one of the volunteer firefighters for the Village of Greenport and the larger east/west fire districts.

We have a number of hotels. Tourism has gone crazy, we all know this, on the entirety of the North Fork. Every hotel that's been built, remodeled, Silver Sand, Hotel Moraine, the Menhaden Hotel, The Greenporter is getting rebuilt right now. All of this is growing exponentially and water is needed.

You also look at our aging population, which is over in Peconic Landing; Peconic Landing is looking to expand right now. You have an Eastern Long Island Hospital within the Village of Greenport; all of our emergency services, and when there's an emergency, people are going over to that hospital. Just about two months ago there was a small issue with their water line going into the hospital and you wouldn't believe what we had to do, working with the hospital, in order to try and solve for just having water down for a couple of hours at that hospital.

I was born and raised in the Santa Clara Valley of California in what is the largest Superfund site in the entire United States. I'm likely sick because of some water issues that happened there. We have water issues in a number of wells throughout the North Fork, we all know this. We don't talk about it enough. There are private wells in Mattituck that are failing, there are numerous wells in Orient that are failing, and we run the risk of having even more problems. The Village of Greenport used to own all of its own wells and they were sold some three decades ago to the Water Authority and a number of those have failed over time.

The salt water inundation is also growing exponentially. There is a USGS survey -- a slightly different one than the one that was referenced earlier -- that was specific to the Village of Greenport looking at this issue. While that survey has not officially been published yet, a university presentation last year was published and we shared that with a number of folks in the community and it is frightening to see what is happening with salt water.

I, as Village Mayor, would rather be on the side of caution and planning and see this pipeline get built and know that we have this as a resource. And I very much hope Supervisor Halpin and the Town of Riverhead will work with all of us to solve for this because, frankly, our fire department and the rest of us who need to take care if any number of issues can't afford not to.

I hope everybody will give this very strong consideration, because this is an enormous need that we cannot delay.

Response: Comments acknowledged. The comments identify public-supply, fire-protection, health-care, and seasonal-demand concerns raised by the Village of Greenport. The DEIS addresses system pressure, peak demand, storage levels, and fire-flow reliability in Sections 1 and 2 and Appendix B of the DEIS. The concerns support the need for the project but do not alter the impact analyses or substitute for the findings required at the conclusion of SEQRA review.

Comment WCY-1: The DEIS overstates the benefits of the preferred alternative (Page 5):

"The North 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.” (page 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 when irrigation is needed.

Response: The DEIS recognizes that SCWA’s existing Southold system can meet current normal off-peak demand and that the most pronounced operational stress occurs during seasonal peak periods; it does not claim that the system fails continuously or throughout the year. Appendix B of the DEIS describes peak-demand conditions, declining water-storage tank levels, limited reserve capacity, projected future demand, chloride-related restrictions on certain wells, and the need for reliable pressure and fire-flow capacity. The proposed water main would supplement the existing system with a safe, reliable, routinely monitored potable-water supply from source areas that available water-quality monitoring indicates are less vulnerable to saltwater intrusion and contamination than portions of the Town of Southold. The source wells have sufficient permitted capacity to serve the North Fork and would help SCWA maintain suitable emergency storage. The project would also improve system reliability, provide adequate reserves and pressure for firefighting and other emergencies, support public health and quality of life, and accommodate residential and commercial growth projected under current Town zoning. Conservation would remain a complementary measure.

Comments WGJC-4, WJC-2: The project would provide no direct benefit to Riverhead.

Response: SEQRA does not require every action to provide a direct benefit to every municipality, property owner, business owner, or individual near a project location. It requires the Lead Agency

to identify relevant environmental impacts and avoid or minimize those impacts to the maximum extent practicable. The project would provide regional public-health and water-supply benefits by delivering safe, clean, routinely monitored drinking water; maintaining pressure for residential and economic needs; supporting adequate fire-flow capacity; and improving long-term service reliability and quality of life. SCWA believes the DEIS satisfies the applicable SEQRA requirements and is consistent with its mission.

The primary focus of an EIS is the prevention or mitigation of environmental impacts; however, the proposed project also provides regional water-supply and public-health (or social) benefits which will be considered together with the temporary construction-related traffic and access impacts along County and State roads in the SEQRA Findings Statement.

SCWA has identified construction and traffic-management measures and will remain open to additional practicable measures. Following installation, disturbed roadway areas would be restored, including stabilization of unpaved shoulders and restoration of pavement surfaces. It is noted that Town of Riverhead residents (as well as all travelers along the proposed construction route) will benefit from complete roadway restoration along the proposed construction route, which will provide newly paved streets paid for by SCWA (rather than the entity with jurisdictional authority of the roadways along the construction route, who have the responsibility for regular maintenance and periodic roadway repaving costs). If the DEIS Proposed Action (northern route) is selected, the Town of Riverhead would directly benefit from the savings in the highway budget needed for Town roadway restoration/repaving, as would Suffolk County (for County roadways) and NYS Department of Transportation (NYSDOT) (for NYS roadways). As taxpayers in both NYS and Suffolk County, Town of Riverhead residents will benefit from SCWA paying for the capital costs associated with the restoration /repaving along either route selected.

2.2 Project Details

2.2.1 Directional Drilling

Comment WJS-9: The Project requires directional drilling 30 feet below the Peconic River. 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?

Response: The Gardiner's Clay is mapped well south of the Peconic River and is much deeper than 30 feet. Attachments 1B and 2A of the DEIS include the Peconic River directional-drill plan

and profile made available to the public and involved and interested agencies. The plan and profile present soil cross sections from three test holes advanced to depths of approximately 50 to 55 feet. Depths for Test Holes 1 and 3 were measured from the ground surface, while the depth for Test Hole 2 was measured from the Peconic River bed, thereby documenting subsurface conditions within the proposed drilling area. For each test hole, the cross sections identify the soil layers encountered; the depth and thickness of each layer; and the soil color, texture, and relative composition, including fine and coarse sand, gravel, silt, and clay. Test Hole 2 encountered primarily fine-, medium-, and coarse-textured sands with some gravel; and trace clay identified between 50 and 55 feet below the riverbed, which is below the proposed main's maximum depth of 30± feet. Test Holes 1 and 3 encountered generally similar sandy conditions, with only trace or limited clay, except for a layer in Test Hole 3 between 25 and 30 feet below ground surface described as primarily light-brown clay with some fine gray sand and trace gravel and mica. Since Test Hole #3 was drilled from the ground surface instead of the riverbed, the main horizontal drill would be beneath this layer in sand of differing textures.

Based on the directional drill plan and profile, test-hole cross sections, and the proposed depth and location of the HDPE pipe, available information indicates that the limited clay identified in the borings is unlikely to materially affect the directional drilling operation. The proposed use of HDPE pipe, bentonite sealing, adequately sized slurry collection and disposal pits, silt fencing with haybales, and other best management practices described in the DEIS is intended to avoid or minimize potential soil, geologic, and hydrogeologic impacts. The other directional-drill locations involve relatively shallow installations beneath roads or the Long Island Rail Road. With implementation of the identified measures, significant adverse soil, geologic, or hydrogeologic impacts are not anticipated.

Comments H3JN-4, WRD-13, H2VV-2, WSLM-6, WSLM-7: The commenters request additional information on directional-drilling staging and recovery areas near the Peconic River and other sensitive wetlands in Southampton, including cross-sectional designs, general entrance/exit pit details, pit dimensions, groundwater depths, staging areas, filter bag/dewatering weir details, site-restoration provisions, sediment control measures, and potential impacts to wetlands and protected lands. The FEIS should also include information related to dewatering, including box trench details, maximum pumping rates, and sediment controls for pipe installation.

They ask that comparable details be provided for any future East Marion-to-Orient work and emphasize the importance of avoiding or minimizing impacts to the East End's remaining natural shorelines and wetland resources.

Response: The directional-drill plans locate setup areas, entrance and exit pits, and the 1,000-cubic-foot, 110 percent capacity, bentonite recovery pool outside wetlands, as verified through

field inspections. See **Appendix C-2** of this FEIS for more detailed Peconic River directional drill plans and **Figures 1-4 (Appendix C-4)**, which provide wetland boundaries, areas of proposed entry/exit pits, construction equipment staging and HDD laydown areas, and approximate areas of erosion controls.. The NYSDEC General Wetlands Permit does not permit drilling and associated surface disturbance within wetlands (therefore requiring an individual wetland permit application). SCWA will request and receive all applicable required permits before initiating any directional drilling. As shown on the plans, the staging areas, pits, and slurry-collection areas would be located within the outer portion of the road right-of-way and separated from the Peconic River on both its north and south sides. Silt fencing would surround the work areas to contain sediment, and recovery pools would temporarily contain drilling slurry before collection and off-site disposal. Bentonite, slurry, and sediment removed from beneath the river would be removed from the pits before capacity is reached and transported to an approved, licensed, or registered disposal facility. After drilling is completed, the pits would be backfilled with native sand and soil, and disturbed ground would be stabilized with native seed mix or mulch to prevent erosion and sedimentation. The primary staging area for the Peconic River directional drilling will be the northside of the river since this area is farther from wetlands.

As detailed in the DEIS, subsurface horizontal directional drilling would proceed through the following specific construction, containment, material-management, and restoration steps:

- surveying the route;
- understory clearing and/or pruning within laydown and staging areas and around the 20-foot-long by 20-foot-wide by 5-foot-deep pipe entry and exit pits at each end; no tree removal is anticipated;
- installation of silt fencing to prevent sediment from entering wetlands or surface waters;
- staging and laydown of directional drill equipment and pipe sections and setup of the directional drill unit in the designated work area;
- excavation of the 20-foot-long by 20-foot-wide by 5-foot-deep directional drill entry and exit pits (6-foot-deep for bentonite/slurry recovery pits) and retention of the back fill within the limits of the silt fencing;
- providing the primary directional-drill staging area on the north side of the river, where practicable, because that area is farthest from wetlands-although both sides are far outside State and local jurisdictions (see **Appendix C-2** and **C-4** of this FEIS);
- drilling the initial pilot hole below ground;
- pre-reaming the drill route to successively larger diameters;
- pumping a bentonite slurry through the borehole to stabilize the bore and pulling the water main from the entry pit, horizontally through the completed bore, and into the exit pit;
- reusing native soil material retained in the work area for backfill for the drilling pits;

- using the pits as bentonite recovery pools, containing any extra bentonite used for the drill;
- removing excess soil, slurry and bentonite for proper disposal at an approved disposal facility;
- connecting each consecutive section of pipe to the previously installed pipe; and
- backfilling pits and stabilizing the bare disturbed ground surface in the work area.

Piping used for directional drills will consist of 24-inch diameter HDPE pipe for the Riverside/Flanders to Jamesport/Laurel route and 12-inch diameter HDPE pipe for the East Marion to Orient route.

At the Dam Pond–Orient Harbor crossing along the Main Road causeway, the pipe would be installed near but above surface waters and wetlands. Details of the HDD crossings are provided on **Figures 1-4** (see **Appendix C-4**), which provide wetland boundaries, areas of proposed entry/exit pits, construction equipment staging and HDD laydown areas, and approximate areas of erosion controls. The avoidance, erosion and sediment controls, materials and construction equipment storage/staging management, stabilization, and restoration measures identified in Sections 2.1, 2.2, and 4.1 of the DEIS would apply to this work. Additional details regarding erosion controls and pavement restoration are also provided on the Preferred Alternative Site Plans (**Appendix C-1**) and the Peconic River HDD Plan and Profile (**Appendix C-2**).

2.3 Booster Stations

Comment WRB-1: My house is located at 486 Main Road, which is in the Riverhead Township Historical Register. Where will the booster station at the intersection of Main Road and Route 105 be located? Specifically, which corner will the booster station be located (i.e.,) the north west, south west or north east corner? Will the proposed water line run on the north or south side of Main Road? What safeguards are in place to ensure no damage to the Residence.

Response: The Preferred Alternative booster station would be located near the southeast corner of the Cross River Drive–Main Road intersection, approximately 0.73 mile west of the referenced residence at 486 Main Road. The site is a flag lot located behind a small parcel fronting on Main Road and is identified as SCTM No. 600-85-2-112. From the booster station, the proposed water main would extend north along the flag pole and driveway, then be directionally-drilled beneath Main Road to its north side. It would continue east within the paved right-of-way along the north side of Main Road to the Riverhead–Southold Town line, as shown on Sheet 7 of 14 in DEIS Attachment 2A.

Impacts associated with construction and operation of the booster station would be avoided or minimized through limited clearing, retention of existing vegetation and vegetative buffers where practicable, installation of erosion and sediment controls, use of a stabilized construction entrance to remove sediment from tires before exiting the site, proper soil management and disposal, dust-control measures, reseeding and restoration of disturbed areas, and compliance with applicable SWPPP/SPDES requirements. The crossing of Main Road would be completed by directional drilling from south to north and with directional drill equipment and piping staged within the booster station driveway to minimize roadway disturbance and traffic disruption.

Noise impacts would be minimized by limiting construction to typical weekday daylight hours where practicable, using properly maintained construction vehicles and equipment with mufflers and silencers, shutting down equipment when not in use, enclosing pumps within the booster station building, and placing the backup generator within a sound-attenuating enclosure. Additional operational mitigation would include installation of a six-foot-high opaque perimeter fence or chain-link fence with privacy slats, maintenance of vegetated screening around the facility, daily inspection and maintenance when needed, limited lighting, and restricted access through fencing and a locked gate.

Potential fuel-related impacts from the backup generator would be addressed through compliant diesel fuel storage, including double-wall construction, leak detection, fuel-level monitoring, and alarms. Because the facility would be unmanned except for a brief daily inspection and occasional maintenance, long-term operational impacts are expected to be limited. See Preferred Alternative booster station plans and station elevation plan in DEIS Attachments 2B and 2C.

The booster station will be inspected daily and maintenance will be performed as needed.

Comments WJS-11, WJS-32, WJS-17, WJS-45, WJS-46, WJS-50: These comments question the viability and review of the Sound Avenue route, which may require a second booster station or larger 36-inch diameter main with water-age concerns, and ask why the location and impacts of any additional infrastructure were not identified. They also seek clarification of the basis for preferring the Main Road/Route 25 alignment—including hydraulic performance, wetlands, construction impacts, and mitigation—and contend that deferring final route selection until the SEQRA Findings Statement stage limits meaningful public review, municipal coordination, emergency planning, and development of enforceable mitigation measures.

Response: The Hydrogeologic Analysis and Route Evaluation Report considered hydraulic performance, route length, constructability, cost, wetlands and other environmental constraints, utility conflicts, traffic, and community disruption for the Sound Avenue and Main Road routes. It identifies a potential second booster station as one way to maintain pressure on the Sound

Avenue route and notes that increasing the main diameter to 36 inches would raise water-age concerns. The second booster station for the Proposed Action would be the same as is proposed for the Preferred Alternative at the southeast corner of Cross River Drive (CR 105) and Main Road (SR 25) in Aquebogue. See DEIS for a detailed assessment of impacts from the Cross River Drive-Main Road booster station and the identified mitigations.

The Main Road route was identified as the Preferred Alternative because it provides the evaluated hydraulic and construction advantages described in the DEIS, including a shorter alignment, wider and safer shoulders, and avoids the need for a second booster station. The detailed route comparison is provided in Section 5, “Alternatives” of the DEIS.

The comparative alternatives analysis considered these factors together with hydraulic performance, constructability, cost, wetlands and other environmental constraints, utility conflicts, traffic and community disruption, and available mitigation, supporting identification of the Main Road/Route 25 alignment as the Preferred Alternative while leaving the Sound Avenue route under consideration. If the Sound Avenue route were selected, any required booster station and its site-specific impacts and mitigation would be identified and evaluated before approval including preparation of an EIS supplement if necessary. The full environmental review including Hydrogeologic Analysis and Route Feasibility study presented the Proposed Action, Preferred Alternative, Peconic Boulevard Alternative and other options for public and agency review, including presentations at public hearings and during the written comment period. Consistent with SEQRA, SCWA will make a final route selection only after considering all substantive comments, preparing and accepting the FEIS, considering the entire SEQRA record, and adopting a Findings Statement that documents the full environmental record, balances relevant social, economic, and environmental considerations, and identifies the selected alternative and mitigation measures. Final permits and approvals would follow completion of that process, with continued coordination among affected municipalities, agencies, emergency-service providers, property owners, and other stakeholders during final design, permitting, and construction planning.

Comment WRD-14: The FEIS should make clear that for all proposed building or site plan construction of future 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.

Response: The proposed unmanned booster station would incorporate site-design and operational measures to minimize lighting, vegetation, and stormwater impacts. Exterior lighting

would be limited to that necessary for site security and emergency inspection, maintenance, or repair; fixtures or flood lighting would be directed downward and shielded or focused on the specific areas requiring illumination to ensure worker safety and facility security while minimizing glare and excessive illumination, and preventing light trespass. The station would be set back approximately 250 feet from Main Road, and existing vegetation would be retained to the maximum extent practicable to screen the facility and further reduce off-site lighting and visual effects.

Site clearing would be limited to the area necessary for the booster-station building, driveway, small parking area, transformer, generator, and related equipment. Temporarily disturbed areas would be restored and landscaped using native or site-appropriate vegetation where practicable, with priority given to maintaining and supplementing existing vegetative buffers. Roof runoff would be collected through gutters and leaders and recharged onsite within pervious, vegetated soils. The final site design would also evaluate the practicability of using pervious paving or other permeable-surface treatments in suitable low-traffic areas, provided those materials are compatible with facility access, maintenance, structural, and operational requirements. These measures would minimize site disturbance, retain runoff onsite, and reduce potential lighting and visual impacts to the maximum extent practicable.

2.4 Construction Schedule and Operations

Comment WDOT-1: As stated in NYSDOT's previous SEQRA correspondence for this project, all utility installations within the 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.

Response: Comment acknowledged. The DEIS identifies open-cut installation within roadway rights-of-way and trenchless installation at specified crossings. NYSDOT, by default, requires trenchless installation within State rights-of-way unless it accepts a project-specific written justification for open-cut work.

SCWA met with NYSDOT on October 28, 2026, to further discuss the project and request clarification on NYSDOT's requirements. NYSDOT indicated that open-cut proposals are considered on a case-by-case basis subject to submission of justification, and the request must be reviewed by multiple NYSDOT groups. Because the proposed Main Road alignment is largely within the roadway shoulder, existing shoulder pavement conditions would be an important consideration in evaluating any justification for open-cut installation.

Pending NYSDOT's determination, neither full-route horizontal directional drilling (HDD) nor approval of open-cut installation is confirmed. Open-cut installation remains a possibility for shoulder segments if NYSDOT accepts the supporting justification but HDD may still be required at individual crossings. SCWA indicated it would submit its justification for trenching and would defer to NYSDOT regarding requirements at various crossings that may require HDD. **Appendix F** contains NYSDOT's confirmation of SCWA's understanding of meeting conclusions. The applicable method for each State-road segment will be determined through final engineering and the NYSDOT Highway Work Permit review. SCWA will submit the required plans and any requested justification to NYSDOT and will comply with the resulting permit conditions. NYSDOT's final determination will be made during permit review and requirements finalized as part of the permit conditions.

2.5 Topography, Soils and Agriculture

Comment WJS-29: Provide an additional column in Tables 2-4 and 2-5 of the DEIS to identify Agricultural Soils.

Response: In response to this comment, the soil-characteristics tables for the Phase I and Phase II route corridors and the Pier Avenue and Main Road booster-station sites have been amended to identify mapped Class I and Class II prime agricultural soils. See **Appendix D** of this FEIS. As discussed below, the proposed main would be installed primarily within existing road rights-of-way, and the mapped classification of soils beneath paved or previously disturbed roadway areas does not indicate conversion of active agricultural land.

The Preferred Alternative water main would be installed primarily within paved or previously disturbed portions of existing road rights-of-way dedicated to transportation, drainage, and public utilities. These areas have previously been cleared, graded, or paved and contain roadway-base materials and existing utilities. Although portions of the corridor are mapped as Class I or Class II prime agricultural soils, the affected rights-of-way are not used or available for agricultural production. Accordingly, installation within these existing rights-of-way would not convert active or available farmland to a nonagricultural use. Suitable soil excavated during open-cut trenching would be reused as backfill where practicable.

Comment WJS-33: Golden Nematode - According to USDA recommendations issued in September 1968 as Agriculture Handbook No. 353, the decontamination of equipment would require either applications of methyl-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 methyl-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 methyl-bromide requires specific training and recordkeeping as per USEPA and NYSDEC requirements; are SCWA and its contractors trained for this type of control method?

Response: Baseline and post-construction soil testing would be conducted, as appropriate, to monitor for the presence of golden nematode cysts in and around the area of disturbance. Construction activities will follow applicable USDA APHIS and New York State Department of Agriculture and Markets quarantine requirements and current best practices for work in regulated or potentially infested areas. Required measures may include containment of excavated soil, cleaning and decontamination of equipment, protection of adjacent agricultural lands, and controls preventing soil from being moved from the construction area into adjacent areas.

Construction vehicles and equipment would remain within the road right-of-way and would not encroach upon adjacent privately owned farmland. Before leaving regulated or potentially infested areas, vehicles and equipment would be cleaned of soil using high-pressure washing or steam cleaning, as required or appropriate. Wash water, slurry, and soil generated during decontamination would be contained and managed in accordance with applicable regulatory requirements. Excavated soil would remain within the active daily work area and would be covered or otherwise stabilized, as needed, to prevent dispersal by wind or water. Suitable excavated soil would be reused as backfill where appropriate; material requiring off-site removal would be transported and disposed of in accordance with applicable quarantine and waste-management requirements.

Methyl bromide has historically been used as a fumigant for golden nematode control. Use of this chemical compound is not proposed for this project unless a positive detection is confirmed and the applicable regulatory agency requires or authorizes its use. Any such application would be performed by properly trained and certified personnel in compliance with applicable USEPA, USDA APHIS, NYSDEC, and New York State Department of Agriculture and Markets requirements, including applicable health-and-safety, training, and recordkeeping requirements. Contractors would also be required to follow applicable biosecurity protocols and receive instruction regarding golden nematode identification, soil-handling restrictions, equipment decontamination, and regulatory obligations. SCWA would coordinate with affected landowners, growers, and agencies, as needed, regarding construction schedules, required controls, and measures to prevent the spread of golden nematode.

All work in sensitive areas, including locations where golden nematode cysts are identified and areas near wetlands, would be subject to the applicable mitigation measures identified and would be overseen by an SCWA-designated project manager responsible for verifying proper implementation of required construction controls.

2.6 Water Resources

2.6.1 Surface Waters and Wetlands

Comments H1GD-4, WST-1, WST-2, WSLM-8: If Suffolk County Water Authority will not seek town wetlands permits, what independent standards will apply to protect those areas, who will enforce them, and then how will they engage with the towns here?

The Town of Southold Board of 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.

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?

Response: The project alignment has been designed to avoid direct disturbance to mapped wetlands and to remain within existing road rights-of-way. SCWA currently holds a NYSDEC General Wetlands Permit that establishes conditions for work near regulated wetland resources and prohibits excavation, vegetation removal, soil exposure, and other surface disturbance within freshwater and tidal wetlands. Proposed surface work would occur within existing road rights-of-way. At sensitive crossings, the water main would be installed by subsurface directional drilling beneath the wetland, surface water, or riverbed, with entrance and exit pits and associated staging areas located outside wetland areas.

SCWA is subject to NYSDEC review, and work outside the scope of the NYSDEC General Wetlands Permit would require additional NYSDEC review and approval, as applicable. SCWA, as Lead Agency and project sponsor, would incorporate the required mitigation measures into final design and construction documents and would be responsible for ensuring their implementation. These measures include locating work within paved or previously disturbed road rights-of-way where practicable; using directional drilling at sensitive crossings; placing drill pits, staging areas, and slurry-containment areas outside jurisdictional wetlands where feasible; installing erosion and sediment controls before ground disturbance; managing excavated soil, bentonite, and drilling slurry; stabilizing disturbed areas; and restoring affected surfaces after construction. NYSDEC would retain oversight and enforcement authority under its permit and applicable regulations.

See **Section 2.2.1**, Directional Drilling for additional information on work in proximity of wetlands that will require NYSDEC permits. As noted above, the following areas are expected to be subject to individual permits:

- At the Dam Pond–Orient Harbor crossing along the Main Road causeway, the pipe would be installed near but above surface waters and wetlands.
- Peconic River HDD crossing, see **Preferred Alternative Site Plans (Appendix C-1)**, the **Peconic River HDD Plans and Profile (Appendix C-2)**.

Details of the HDPE crossings are provided on **Figures 1-4** (see **Appendix C-4**), which provide wetland boundaries, areas of proposed entry/exit pits, construction equipment staging and HDD laydown areas, and approximate areas of erosion controls. The avoidance, erosion and sediment controls, materials and construction equipment storage/staging management, stabilization, and restoration measures identified in Sections 2.1, 2.2, and 4.1 of the DEIS would apply to this work. Additional details regarding erosion controls and pavement restoration are also provided on the Preferred Alternative Site Plans (**Appendix C-1**) and the Peconic River HDD Plan and Profile (**Appendix C-2**).

The comment identifies the Trustees' jurisdiction and typical permit authority. SCWA acknowledges that the Trustees may review activities within their jurisdiction and will continue to coordinate with applicable agencies regarding permit requirements and appropriate mitigation measures. The DEIS identifies measures intended to avoid or minimize potential impacts, and those measures may be refined through the permitting and agency-coordination process.

Numerous mitigation measures were provided throughout the DEIS to protect wetlands, including, but not limited to those provided in Sections 2.1.3, 2.2.3, 2.3.3, and 4.1.3 and the NYSDEC General Wetlands Permit in Appendix G of the DEIS. Wetland mitigations include:

- **Identify and protect wetland and surface water areas before construction.** Identify locations near surface waters and wetlands, flag or otherwise recognize jurisdictional areas, and install protective controls before work begins.
- **Avoid and minimize wetland disturbance through routing and construction methods.** Keep work within existing paved road rights-of-way and unpaved shoulders, use horizontal directional drilling beneath sensitive crossings such as the Peconic River and other constrained areas, and locate drill pits, staging areas, and work areas outside wetlands or wetland jurisdictional areas where feasible.
- **Implement erosion, sediment, and stormwater controls.** Comply with applicable SWPPP, SPDES General Permit, NYSDEC Technical Guidance Manual, and NYSDEC General Wetlands Permit requirements; install silt fencing, sediment barriers, and drainage inlet protection; recess silt fencing at least six inches, where needed to prevent underwash; protect soil stockpiles; and regrade disturbed areas to direct runoff toward catch basins, drainage swales, or other appropriate drainage features rather than wetlands or adjacent properties.
- **Manage trenching, soils, and restoration to limit erosion and runoff.** Avoid trenching during rainstorms, promptly backfill trenches after pipe placement, use trench boxes and suitable bedding material where needed, reuse suitable excavated soils where practicable, properly dispose of excess or unsuitable material, restore disturbed areas to prior conditions where practicable, and reseed or stabilize exposed soils and shoulders after backfilling and grading.
- **Control directional drilling materials.** Install silt fencing around work and staging areas. Use bentonite to stabilize boreholes, seal around pipe, reduce collapse risk, and limit water seepage; use properly sized bentonite recovery pools and containment measures; provide pump truck support where needed; remove slurry, bentonite, excess sediment, and excess soil from drill pits and recovery areas; dispose of materials at approved facilities; and backfill pits and recovery pools with clean, compatible material. Reseed or stabilize bare soils.
- **Limit clearing and protect vegetation and habitat.** Limit clearing, pruning, and temporary vegetation disturbance to the minimum area necessary for staging, shoulder work, directional-drilling access, and booster station construction; and restore temporarily disturbed vegetated areas following construction. Based on preliminary field inspections, tree clearing is not necessary.
- **Maintain equipment and control dust, tracking, and contaminants.** Inspect and maintain equipment to prevent leaks; wet exposed soils when needed to control dust; install

stabilized construction entrances where appropriate; wash or spray down vehicles and equipment before leaving work areas; cover truck loads where needed; and minimize soil tracking onto roadways.

- **Apply golden nematode biosecurity controls where applicable.** Clean construction equipment and vehicles before leaving regulated or potentially infested areas, avoid moving soil off site unless properly tested, cleared, or disposed of, train construction personnel on applicable biosecurity measures, conduct soil testing where appropriate, and coordinate with NYSDAM and USDA APHIS as needed.

The comments primarily address wetland jurisdiction, field verification, permitting, agency coordination, and responsibility for installing and maintaining protective controls. During final design and construction planning, SCWA would verify work areas near wetlands and surface waters, incorporate applicable avoidance and mitigation measures into the plans and specifications. Required erosion and sediment controls, drilling-fluid containment, soil-management, stabilization, restoration, and inspection measures would be installed before the associated ground disturbance and maintained throughout construction. With implementation and oversight of these measures, significant adverse impacts to wetlands are not anticipated.

An SCWA-designated construction manager or environmental compliance liaison would be responsible for verifying that required scheduling restrictions, mitigation measures, permit conditions, and construction-management practices are incorporated into the work and properly implemented. Responsibilities would include documenting pre-construction installation of erosion and sediment controls, conducting periodic inspections, directing corrective action where deficiencies are identified, and coordinating OR INFORMING SCWA, contractors, NYSDEC, and affected municipalities, as appropriate. Final plans and specifications would identify the responsible individual, applicable inspection frequency, documentation requirements, and procedures for addressing any deficiencies.

Comments WJS-21, WJS-22, WJS-23, WJS-24, WBB-8: These comments raise related concerns regarding wetland identification, regulatory jurisdictions, permitting, and mitigation. The commenters state that the DEIS relies on wetland inventory mapping and the NYSDEC General Wetlands Permit rather than project-specific field delineations, and assert that field verification is needed near potential wetland areas to identify wetland boundaries, work area distances, permit requirements, and mitigation before SEQRA is completed. The comments reference areas near Saw Mill Creek, Terrys Creek, Meetinghouse Creek/Church Lane/Route 25, the area near 822 Main Road, hydric and wetland-associated soils along Main Road in Aquebogue, directional drilling entrance and exit pits, staging areas, and trenching locations. The comments also state that Town of Riverhead wetland jurisdiction may extend beyond NYSDEC-regulated areas and request that Town wetland boundaries, regulated areas, approvals, and enforcement

mechanisms be addressed while maintaining accurate wetland mapping and construction controls.

Response: The comments are acknowledged. See response above. The DEIS identifies mapped State and Federal wetland resources, surface waterbodies, hydric soils, and wetland-associated areas along the proposed routes to evaluate potential physical constraints and environmental sensitivity, and identify suitable avoidance, minimization, and mitigation measures. The project has been designed to avoid direct disturbance to wetlands by locating work within existing paved or previously disturbed and designated road rights-of-way, installing erosion and sediment controls, using directional drilling at sensitive crossings, where appropriate, and placing drill pits, staging areas, and other temporary work areas outside jurisdictional wetland areas where feasible. Hydric or wetland-associated soils mapped within paved or previously disturbed road corridors do not, by themselves, establish the presence of jurisdictional wetlands within the roadway. Those mapped soil locations, together with existing drainage features and site conditions, would be used during final design and construction planning to identify locations where field verification, agency coordination, or site-specific construction controls may be warranted. Field observations did not identify wetland vegetation within the roadway or road right-of-way; however, work areas near mapped wetlands, surface waters, hydric soils, or wetland-associated soils would be reviewed before construction to verify applicable protections and controls. Additional wetland boundaries and plan details are provided in **Appendix C**.

SCWA will continue to coordinate with NYSDEC and, and any activity outside the scope of the NYSDEC General Wetlands Permit will be subject to additional NYSDEC review and approval, as applicable. To the extent final design or construction planning identifies work within or near areas regulated by a Town wetlands program, SCWA will inform the affected Town as needed regarding the location of those regulated areas, applicable standards, notification procedures, and practical measures to avoid or minimize wetland-related impacts. This does not change SCWA's position regarding the applicability of local permitting requirements, but it recognizes that SEQRA requires consideration of potential wetland impacts and mitigation regardless of whether a separate local approval is ultimately determined to be required.

Wetland protection measures would include pre-construction identification of nearby wetland and surface-water resources; installation and maintenance of erosion and sediment controls; protection of soil stockpiles; avoidance of trenching during rain events where practicable; prompt backfilling and stabilization of disturbed areas; containment and proper management of directional-drilling fluids; off-site disposal of excess soil, bentonite, slurry, and unsuitable material; restoration of disturbed roadway and shoulder areas; and continued inspection and adjustment of controls during construction (see plans and figures provided in **Appendix C-1, C-2 and C-4**). These measures are commonly used for utility construction near wetlands and are

designed to protect wetland resources. They are intended to avoid direct wetland disturbance, prevent sediment and runoff from entering wetland areas, and ensure that temporary construction activities do not result in significant adverse wetland impacts. With implementation and oversight of these measures, significant adverse impacts to wetlands are not anticipated.

Comments WJS-25, H2VV-1: The first commenter states that the Town of Riverhead is constructing a major stormwater mitigation project at Route 25 and Church Lane to improve water quality in Meetinghouse Creek, including use of a reconstructed freshwater wetland. The commenter asks how the proposed water main project could affect that stormwater and wetland restoration project and what specific mitigation measures are planned.

The second commenter questions whether SCWA has adequately evaluated the proposed water main's potential effects on the approximately \$2.2 million wetland restoration project at Meetinghouse Creek along Main Road. The project involves multiple stakeholders and is intended to address flooding and improve water quality in surrounding impaired water bodies. Because water main construction may require dewatering and substantial roadway disturbance while restoration plans are being implemented over the next several years, the commenter is concerned that potential impacts to this new project were not sufficiently examined.

Response: As shown on the Preferred Alternative Site Plans (Appendix C-2), work in the vicinity of Route 25 and Church Lane is within the roadway/roadway shoulder on the north side of the roadway, and would not involve any disturbance to the wetland restoration area. All work in this area would be completed in accordance with the SCWA's NYSDEC Wetland General Permit. The wetland mitigation measures identified in the DEIS and summarized above apply to all sections of road right-of-way near wetlands (see additional details provided in the responses above). These measures are intended to avoid physical encroachment and prevent or significantly minimize the potential for erosion, sedimentation, siltation, runoff, and any direct effects on wetland vegetation, water resources, wildlife, and wildlife habitat. The water-main alignment, work limits, staging, erosion and sediment controls, and restoration requirements would be adjusted where practicable to avoid physical encroachment, interference with completed or planned improvements, and adverse effects on flooding or water-quality functions. With implementation and oversight of the identified measures, significant adverse wetland impacts are not anticipated.

Comments H3BB-12, H3BB-13: The DEIS describes the protocol for excavating activity within 100-feet of any regulated DEC freshwater wetland or 300 feet of tidal wetlands. Riverhead's wetland jurisdictions are 150 and 350 feet, respectively. The protocol described activities including excavation and staging outside of the DEC regulated wetlands areas, "To prevent inadvertent disturbance and ensure effective separation from sensitive wetland resources."

As the lead agency and project sponsor, the Authority cannot hide behind a cloak of Monroe Immunity and ignore potential impacts to portions of existing wetlands because they are within the jurisdiction of a 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 Riverhead Town Code, and seek a permit if any -- if any activity is to occur within.

Response: SCWA has evaluated potential impacts to wetlands and identified numerous impact avoidance and mitigation measures developed by qualified environmental professionals. The DEIS presents an assessment of potential wetland impacts and identifies the proposed protective measures. This information was made available to the public, involved and interested agencies, local towns and villages, and community organizations for review and comment. Comments received during the review process have been considered in the FEIS and will inform final design, permitting, and construction planning.

Proposed work would occur within the right-of-way of the route ultimately selected, which consists of paved or previously disturbed areas containing roadway base, drainage infrastructure, sidewalks, street trees, and existing water, gas, electric, and telecommunications utilities. SCWA would comply with applicable NYSDEC requirements and implement the wetland-protection measures and best management practices identified in the DEIS, FEIS and Findings Statement, including measures addressing erosion and sediment control, soil and material management, directional drilling procedures, work area restoration, and construction oversight. These standard measures for installing underground utility infrastructure near the outer boundary of a wetland-protected area would be implemented consistently with the SCWA's Wetlands General Permit, whether work occurs within 100 or 150 feet from a wetland. They are intended to avoid direct wetland disturbance and minimize potential indirect effects to the maximum extent practicable. With implementation and oversight of the identified controls, significant adverse impacts to wetlands are not anticipated.

2.6.2 Groundwater

Comments H3JN-2, H3JN-3, H2AK-6, H2AM-1, WAK-12: The commenters ask whether SCWA has coordinated with USGS regarding its pending Long Island aquifer study and request that final project decisions await its completion and incorporate the study's results into the environmental analysis.

It was noted that the U.S. Geological Survey, working with NYSDEC, is studying the North Fork aquifer, including its vulnerability to saltwater intrusion. One comment also notes that the DEIS does not use this work, although the Final Scope called for "applicable available USGS reports"

(page 15). The need for the main, and the viability of conservation, storage, and recharge, depend on how much water the aquifer can safely supply. SCWA should obtain the USGS results before making a final decision.

The commenters contend that the study's updated scientific measurements and modeling may provide more precise information on Southampton, East End and North Fork groundwater conditions, including aquifer status, water-use impacts, saltwater intrusion, and sensitive hydrologic features such as kettle holes and vernal pools.

Response: The comment is acknowledged. SCWA has open communications with USGS and the agencies interact and cooperate with each other as needed. When the DEIS and FEIS were prepared, the USGS study referenced by the commenters remained under internal USGS review and was not available as a completed public report. Accordingly, the DEIS and FEIS relied on the applicable groundwater data and studies then available, including the Suffolk County groundwater models and the hydrogeologic analysis in Appendix B of the DEIS, supplemented by CDM Smith's specialized expertise and local knowledge.

The groundwater model evaluated the project's proposed pumping and recharge changes and reported the resulting effects on groundwater levels and stream baseflow. SCWA and the project team also reviewed the publicly available April 2026 USGS presentation to the study steering committee to understand the study's scope, purpose, preliminary findings, and relevance to the proposed project. SCWA also met with USGS to discuss results from field investigations conducted under the Long Island Groundwater Sustainability Drilling Program at 19 sites in Suffolk County. Those findings are consistent with the DEIS characterization that the Upper Glacial aquifer on the North Fork contains a limited supply of fresh groundwater that is vulnerable to saltwater intrusion. They also indicate that deeper aquifer segments beneath the Town of Southold contain saltwater, while the Upper Glacial and Magothy aquifers in Southampton contain abundant fresh groundwater. Any completed, relevant study available before adoption of the SEQRA Findings Statement may be considered as part of the existing record.

Comments H3BS-1, H3BS-5: Specifically in relation to this project, the Water Authority is talking about what it does; supplies fresh water. But it's also not talking about what it doesn't do but will be necessary to be done if this project goes through is dispose of the used wastewater.

Even if there are no new homes constructed, the existing homes will have greater capacity and will use greater water. Someone rented the house next to me last -- two weeks ago and the well ran dry, they're going to have to put a new well in.

The idea of the Riverhead water department supplying some water for the North Fork is good; I don't know if that's included as an alternative in the Environmental Impact Statement.

Response: SCWA's statutory mission is to develop, operate, and maintain a safe and reliable public water-supply system. The proposed project and its environmental review address both the supply of potable water and the reasonably foreseeable effects of transferring water to the North Fork, including changes in groundwater withdrawal and recharge, wastewater management, water quality, and alternatives to the proposed action. These issues were evaluated by SCWA staff, its environmental consultants, and the agencies responsible for reviewing water-supply and sanitary-system requirements.

The CDM Smith analysis evaluated the combined effects of increased groundwater withdrawal from the South Shore Low Pressure Zone, reduced groundwater withdrawal within the Town of Southold, and the additional wastewater discharge or recharge expected within the Southold Low Pressure Zone after the transferred water is used. Together, these modeled inputs provide the technical basis for evaluating potential changes in groundwater levels, groundwater flow, and local hydrogeologic conditions associated with the proposed transfer.

SCWA's Hydrogeologic Analysis and Route Evaluation Study, provided in DEIS Appendix B, evaluated additional water-supply alternatives relevant to the comments, including continued reliance on existing wells in Southold and eastern Riverhead, additional water-storage facilities, desalination, and the purchase of water from the Riverhead Water District. The study also evaluated point-of-use and point-of-entry treatment as separate alternatives.

The study specifically evaluated purchasing water from the Riverhead Water District and concluded that this option would not provide a reliable source for the project. As explained on page 68 of the Hydrogeologic Analysis and Route Evaluation Study, Riverhead experiences its own peak demand during the same periods when SCWA would require supplemental supply, and the Riverhead Water District does not have the capacity to provide the projected peak flow of approximately 6,000 gallons per minute:

"Suffolk County Water Authority has an existing, boosted interconnection with the Riverhead Water District at Peconic Bay Boulevard. Another interconnection could be made on Sound Avenue near the town of Riverhead/ Southold line. In the case of Riverhead, however, having a viable interconnection would require Riverhead to supply water during peak periods when it is needed by Suffolk County Water Authority. Unfortunately, the peak periods are when the Riverhead Water District experiences its own peak and so relying on it would not be a prudent approach. In addition, for an interconnection to be viable, it would need to provide the peak flows and volumes that

are projected to occur throughout the projection period. This would require the Riverhead Water District to supply close to 6,000 gallons per minute at peak to go through the interconnections. The Riverhead Water District does not have this capacity.”

Wastewater generated after water use would continue to be managed through sanitary systems subject to Suffolk County Department of Health Services review and approval. The Department applies design, siting, setback, installation, and groundwater-protection requirements and may require an innovative or alternative onsite wastewater treatment system, connection to a public sewer, or connection to another approved public or private sewage treatment facility where site conditions or applicable standards warrant. These requirements provide the regulatory framework for addressing potential wastewater and groundwater-quality effects associated with existing and future development. The potential Phase 2 service-area buildout analysis in Appendix D of the DEIS estimates that extending public water to Orient Village could result in a maximum increase of five additional single-family homes. Collectively, these homes would be expected to generate no more than 1,500 gallons per day of wastewater. Compliance with current SCDHS requirements, including installation of innovative and alternative onsite wastewater treatment systems (I/A OWTS) for new single-family residences where required, would be expected to minimize associated wastewater and groundwater-quality effects. Based on the limited projected increase, the incremental effect on water resources is not anticipated to be significant.

Comment WRD-11: In addition, should this segment (Main Road in Riverhead) of the proposal proceed, we strongly recommend that 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.

Response: CDM Smith was retained by SCWA to evaluate the feasibility of the alternatives considered and to model groundwater conditions in the project’s source and service areas, including potential water-table drawdown and mounding. CDM Smith was selected based on the qualifications and experience of its professionals, its knowledge of local hydrogeologic conditions, and its prior work and interaction with the affected community, including preparation of the 2025 Orient Water Resources Study. SCWA and its consultants considered relevant information from that completed study, including applicable data and water-supply management options, as part of project planning and environmental review.

Comments H3BS-2, H2BS-5: The idea that we have the sole source aquifer on Long Island is ridiculous. As you know very well, there are many aquifers, but we don't know how many aquifers there are on the North Fork. There are many, many small aquifers that will all be impacted by the importation of water across the boundary of the watershed. So you're talking about the aquifer boundaries, but you need to also address the watershed boundaries, where the water goes after it's used.

I would like to just say that this project does raise political questions and there's arguments between the municipality and the non-profit corporation, economics and politics. But the environmental facts, the real science provides us with what we all know, the more water we use the more waste water there'll be.

Response: Long Island's groundwater system generally consists of three principal aquifers: the Upper Glacial, Magothy, and Lloyd aquifers. A fourth, more localized aquifer—the Jameco—is found primarily in Queens, Brooklyn, and western Nassau County and is not relevant to this response. Where present, the Upper Glacial, Magothy, and Lloyd aquifers occur in descending order. The Lloyd is a deep, confined aquifer that is costly to develop, is saline on eastern Long Island, and is subject to substantial restrictions on use; accordingly, it is not considered a viable source of water for this project. In the Town of Southold, the Magothy aquifer is also affected by saltwater intrusion and is not suitable for use without extensive costly treatment. Although the North Fork contains various deposits—including the Roanoke Point moraine, Roanoke Point outwash, and Ronkonkoma Drift—the USGS classifies them as surficial units of the Upper Glacial aquifer.

The USGS has recently identified a new aquifer which lies between the Magothy Aquifer and the Raritan Clay unit, known as the Upper Raritan Aquifer, which extends regionally throughout Long Island. While this aquifer also exists on the North Fork, it is deep and contains saline water throughout the extent of the North Fork. So, although the USGS has identified 4 aquifers on the North Fork, namely the upper glacial aquifer, Magothy Aquifer, Upper Raritan Aquifer and Lloyd Aquifer, only the upper glacial aquifer contains fresh water.

In the Central Pine Barrens, which encompasses large portions of the Town of Brookhaven and western Southampton and a smaller portion of western Riverhead, these aquifers are relatively deep, contain substantial freshwater reserves, and generally exhibit good to excellent water quality, apart from localized contamination associated with past and present land uses. Compared with aquifer portions in the Town of Southold, the Brookhaven and western Southampton source areas are also less vulnerable to saltwater intrusion.

“Sole Source Aquifer” is a designation established by the U.S. Environmental Protection Agency for an aquifer system that supplies at least 50 percent of the drinking water consumed in the overlying service area and for which no reasonably available alternative source could physically, legally, and economically supply the population if the aquifer became contaminated. Unlike many other regions, Suffolk County has no surface-water reservoirs and does not rely on aqueducts that import water from outside the region; it therefore depends entirely on groundwater. The designation is intended to highlight the importance of protecting the long-term quality and sustainability of this groundwater resource. SCWA considered that designation, together with the need to protect drinking-water quality and quantity, in developing the proposed project.

The comments also raise concerns about transferring water across groundwater-flow or watershed boundaries and about the disposition of that water after use. The project would shift a portion of groundwater withdrawal from the Southold Low Pressure Zone to the South Shore Low Pressure Zone and convey that water for use within the future project service area. After use, water not consumed or exported would generally return to the local hydrologic system through wastewater discharge or other recharge pathways. The CDM analysis evaluated the combined effects of increased withdrawal from the South Shore Low Pressure Zone, reduced withdrawal in Southold, and additional discharge or recharge within the Southold Low Pressure Zone (e.g., return from onsite wastewater systems). That analysis—not the Sole Source Aquifer designation alone—provides the basis for evaluating potential effects on groundwater levels, groundwater flow, and other water-resource conditions associated with the proposed transfer.

CDM’s groundwater-model simulations indicate an overall limited hydraulic response, including modest water-table increases in Southold and mild drawdown in the Quogue area relative to 2022–2024 conditions. Simulated stream baseflow decreases ranged from 2.1 to 4.5 percent compared with existing pumping and recharge conditions and are within normal weather-induced fluctuations. The additional pumping assigned to the 33 wells in the Quogue area would remain well below the permitted capacity of each well.

Comments H2PB-1, H2PB-2, H2PB-3, H2PB-4, H2PB-5: It’s not clear to me, at the end of the day, that this is going to provide increased capacity for the North Fork. But I do believe that this proposal is going to provide a layer of robustness to the quantity and the quality of the water that can be delivered to the North Fork.

The Village of Greenport operates a water system. As a Trustee, I’m responsible for making sure that my customers, my residents, my ratepayers are receiving adequate supply both in quantity and quality of water.

It's my obligation to make sure that we are creating and maintaining the correct infrastructure so that we can continue to serve our ratepayers.

It's also my obligation as a Trustee to make sure our fire department, our volunteers, our residents, and our visitors are safe. And this was very alarming to hear about the water tower at Moore's Lane. We need to make sure that our firefighters have adequate resources to fight fires. I believe that this proposal supports my community's needs. Greenport is also a pro-sensible development community. And when I say that, I mean that we are interested in supporting a robust downtown business district and we have specific housing codes. So we have long-term -- we have current needs and we have long-term goals, and I think this is necessary to support our community's goals.

Response: Comments acknowledged. SCWA shares the stated interests in reliable water quantity and quality, adequate fire-flow capacity, resilient infrastructure, and support for current and long-term community needs. The Proposed Action is intended to advance those objectives by improving system pressure, supply reliability, emergency reserves, and access to routinely monitored potable water for the North Fork service area.

2.6.3 Impacts of Transferring Water from One Community to Another: Water Supply and Water Table Drawdown and Mounding

Comment H2BM-5: I want to make sure we get this right. And I have a general concern about taking water from other communities, what does that mean? We talk about the Pine Barrens? When I think of the Pine Barrens, I hear Badalbayli Symphony playing in my mind, I see deer and I see squirrels and I see the habitat at many different levels. So we're taking that precious resource from the Pine Barrens and shifting it to other places? We have to understand what that means.

Response: Comment acknowledged. The concerns regarding effects on source-area groundwater and ecological resources are addressed through the hydrogeologic analysis prepared for the project. That analysis evaluated the distribution of additional pumping among the identified supply wells, each of which currently has the necessary permitted capacity, modeled changes in groundwater levels and stream baseflow, and compared projected pumping with available well capacity. The resulting findings, together with applicable monitoring and operational controls identified in the DEIS and FEIS, provide the basis for determining whether the proposed transfer would result in significant adverse groundwater or ecological impacts. As discussed, the Pine Barrens contain substantial freshwater reserves due to the area's hydrogeology. The Core Preservation Area designation and other preservation measures have also limited development and associated water demand within portions of the region.

Comments WTM-3, WTM-8, WTM-13, WSLM-5: 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).

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.

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

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?

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?

Response: The 24-inch main's 6,000-gpm figure represents its hydraulic design capacity, not a forecast of continuous groundwater pumping. Appendix B of the DEIS estimates source-well withdrawals from projected North Fork demand and evaluates the long-term effects of those withdrawals using the Suffolk County groundwater model, which operates on annual-average pumping and recharge inputs. Accordingly, the DEIS does not present a model run at 6,000 gpm or characterize that flow as a routine operating condition. This is consistent with SEQRA requirements to analyze reasonably anticipated impacts.

CDM allocated the forecasted annual-average pumpage among the South Shore Low Pressure Zone wells in proportion to their rated capacities because the groundwater model evaluates long-term effects using annual-average inputs rather than the main's 6,000-gpm hydraulic design capacity. Construction of the pipeline would not, by itself, alter the land-use controls governing development in Southold; under current practice, applicants may obtain public-water service if they fund the required extensions and connections. During summer 2026, SCWA issued Stage 1 Water Alerts across much of its service territory to promote conservation and responsible water use during periods of high seasonal demand.

Comment WSLM-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 disproportionately impacted. Consideration should be given to providing a map identifying the approximate supply zone.

Response: The DEIS and Hydrogeologic Analysis identify 33 source wells within 12 wellfields in the South Shore Low Pressure Zone that have significant excess permitted capacity and would be tapped for the project. These wellfields are distributed across western Southampton and southeastern Brookhaven, which would spread the additional pumping among multiple locations rather than concentrate it in a single community or wellfield. Existing North Fork wells within the Southold Low Pressure Zone would remain in service at reduced pumping rates and are distributed throughout the Town of Southold. Specifically, three existing North Fork wells would continue to produce water but would operate at 80 percent of their current volumes, and six wells would operate at 75 percent of their current volumes. See attached source well map showing the 33 wells from the South Shore Low Pressure Zone.

Comment WSLM-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.

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.

Response: Appendix B of the DEIS evaluates the modeled effects of increased pumping at the identified South Shore Low Pressure Zone wells, including water-table drawdown and effects on stream baseflow. The simulations indicate a mild reduction in the water table reduction of 1.2 to 1.8 inches, compared with current average conditions, within the referenced freshwater wetland area. However, as reported elsewhere, the increase in pumpage is well within the permitted pumpage of the wells which were previously approved by NYSDEC after assessment. If wetlands are not hydraulically connected and are indeed perched, the drawdown should have no impact.

It is noted that NYSDEC considers the potential for water-table drawdown during its permitting process for proposed well sites, and the proposed project would not increase pumpage of any of the NYSDEC permitted SCWA well sites beyond the currently permitted well capacity. The requested individual assessments of each wellfield are not necessary and were not identified as required in the Final Scope for this DEIS (see Final Scope, Appendix A-2 of the DEIS).

Comment WCY-2: 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 resulting in a permanent, non-reversible condition of salt water intrusion in 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.

Response: The DEIS discusses anticipated aquifer restoration and replenishment benefits in Sections 1.1.1, "Project Background"; 1.1.4, "Project Benefits"; 2.2.2, "Water Resources"; and 4.3, "Growth-Inducing Impacts." Appendix B and the associated groundwater-modeling report quantify the modeled effects of reduced North Fork pumping and additional recharge. The project would remove eight Southold Low Pressure Zone wells from routine service and reduce pumping at nine others while importing water from the South Shore Low Pressure Zone. Reduced

pumping is expected to lessen localized drawdown and saltwater upconing, while return flow through wastewater discharge and other recharge pathways would add freshwater to the local hydrologic system. Together, these changes are expected to reduce stress on the Southold groundwater system and help limit further saltwater intrusion; they do not establish restoration to a separately defined baseline condition.

Comment WCY-4: 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 1,486 million gallons. It was 1,497 million gallons in 2024 and is estimated to reach 1,529 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 involve in the decision making processes for this project and pre-project planning.

Response: The Proposed Action would shut down eight SCWA wells in the Southold Low pressure zone but it would also reduce the total withdrawal from five existing operational wells by 25 percent utilizing 75 percent of its current use and four existing operational wells by 20 percent of its present use. The overall reduction in production on the North Fork is estimated to be approximately 64 million gallons per year.

Comment WCY-5: 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 its 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 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.

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 the Hydrogeologic Investigation contained in 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.

Response: It is well documented by the NYSDEC, National Oceanic and Atmospheric Administration (NOAA), and numerous other peer reviewed scientific studies of this issue that sea level rise will result in an increased water table elevation, particularly along the coastline. The magnitude of sea level rise in the future is uncertain, as sea level rise projections change in response to evolving climate science; sea level rise will occur whether or not the North Fork Water Main project is implemented. The DEIS documents the changes in the water table elevation that will result from reducing or eliminating pumping at water supply wells that are currently pumping and from the additional recharge from septic systems receiving water from the south shore pressure zone.

The projected water table increase throughout most of the North Fork resulting from implementation of the North Fork Water Main project is simulated to be less than an inch. The areas of highest water table increase (e.g., up to 0.3 feet) are primarily located where pumping will be eliminated or reduced from existing water supply wells, and the water table is restored to unimpacted conditions. As per the USGS Long Island Depth to Water and Hydrologic Conditions Viewer¹, the depth to water in these areas is generally 35-50 feet in these areas. Therefore, on-site wastewater systems in these areas are not expected to be impacted.

The predicted increase in water table elevation in low lying coastal areas of Orient of up to 0.3 feet could result in minor increases in the impacts of predicted sea level rise on the groundwater table and impact the effectiveness of on-site wastewater systems. However, the predicted

¹ <https://ny.water.usgs.gov/maps/li-dtw/>

increase is considered negligible as it is within current seasonal fluctuation and small compared to predicted sea level rise (based on New York State's medium projection of 32 inches by the 2080s²), which is a regional concern along much of the south shore of the North Fork, regardless of this project.

Appendix B of the DEIS predicts a localized water-table increase on the North Fork under the modeled project conditions and compares that change with the annual range of water-table fluctuations.

Comment WCY-6: 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 (page 69).

The siting study presented on page 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. Preparation of the DEIS overlapped with completion of the Long Island Groundwater Sustainability Project (Phase II, Suffolk County), which is not discussed in the DEIS, nor does the DEIS provide for incorporating its findings. The commenter states that new scientific data should be incorporated because additional hydrogeologic information may assist with aquifer management and infrastructure planning.

Response: A principal objective of the project is to identify existing source wells that draw from substantial freshwater reserves, provide good-to-excellent raw-water quality, and have sufficient permitted capacity to meet projected demand and needs. Preserved agricultural lands were not identified as preferred locations for new wellfields because their protected status constrains conversion to public-water infrastructure and because historical agricultural applications may present site-specific water-quality concerns. The North Fork aquifer system is relatively shallow and has limited freshwater storage, is vulnerable to contamination from existing and historical land uses, is bounded by saline surface waters, and is susceptible to lateral and vertical saltwater intrusion from excessive pumping. Developing production wells on preserved or former agricultural lands would require site-specific legal, hydrogeologic, and water-quality evaluation and was not considered a more reliable or practicable alternative to using existing permitted wells with available capacity in less vulnerable source areas. In comparison, the proposed source

wells are existing, permitted facilities with available capacity in less vulnerable source areas. For those reasons, development of new wells on preserved agricultural lands was not considered a more reliable or practicable alternative. See also responses in **Section 2.6.4.** below.

2.6.4 Drinking and Surface Water Quality

Comments H2AK-4, H2AK-5: I didn't see any mention of road salt contribution because that is a real issue that can affect water salinity and drinking water quality. I also didn't see any mention of the confining clay unit that's under the Town of Southold that does help protect us from saltwater.

Response: Comment acknowledged. Winter deicing salts can contribute chloride to groundwater, may affect drinking-water quality, particularly where road runoff is discharged near shallow or vulnerable aquifer areas. The applicable Town highway departments, Suffolk County Department of Public Works, and New York State Department of Transportation administer road maintenance and deicing practices. SCWA will continue to monitor chloride concentrations in its source wells and coordinate, as appropriate, with the responsible roadway agencies regarding locations where deicing practices or drainage conditions may warrant further review. Effective deicing and anti-icing practices that minimize salt application while maintaining roadway safety would help reduce potential water-quality effects. The hydrogeologic analysis also considers the subsurface geologic units beneath the Town of Southold. The confining unit identified deep below the North Fork's ground surface is affected by lateral saltwater intrusion as well as underlying saline water and thus does not eliminate the vulnerability of the North Fork's freshwater system to lateral or vertical saltwater intrusion. The project evaluation therefore does not rely on that unit as protection from salinity impacts.

Comment H2MDC-4: And then the nitrification that is coming from people watering their lawns and using pesticides and all of that, that's not going to change if we keep doing what we're doing and people think there's so much water they don't have to conserve. We're going to keep destroying our water and then we're not going to be able to swim or have fish, and who's going to come to Long Island?

Response: Comment acknowledged. Excess nitrogen can adversely affect groundwater quality, drinking-water supplies, and surface waters, particularly saline and brackish systems where elevated nutrient loading can contribute to eutrophication and harmful algal blooms resulting in low dissolved oxygen (hypoxic or anoxic conditions) that can affect aquatic life. Nitrogen sources include lawn and agricultural fertilizers, onsite wastewater systems, cesspools, pet and livestock waste, wildlife, and atmospheric deposition. Stormwater runoff can transport soluble nitrogen and other pollutants to groundwater and nearby surface waters. SCWA supports measures that

reduce unnecessary fertilizer use, promote lower-impact landscaping and lawn-care practices, and replace conventional onsite sanitary systems with innovative and alternative onsite wastewater treatment systems (I/A OWTS) which have superior treatment capabilities. These measures, together with water-conservation practices that reduce excessive irrigation and runoff, would help protect groundwater and surface-water quality; however, implementation of measures to address these inputs is outside SCWA's powers.

Comments WTM-1, WTM-6, WTM-11, WSLM-4: *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.

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.

Contamination Site Inventory Required in FEIS: The FEIS 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. 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.

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.

Response: SCWA routinely monitors raw water from its source wells and finished drinking water in accordance with Suffolk County Department of Health Services requirements, the federal Safe Drinking Water Act, and other applicable drinking-water standards and policies. This monitoring is used to identify water-quality trends and determine whether operational adjustments, additional investigation, treatment, or other protective measures are warranted.

NYSDEC is the permitting agency for SCWA's public-supply wells. The 33 proposed source wells in the South Shore Low Pressure Zone are existing, permitted wells with sufficient excess permitted capacity to serve the project area. NYSDEC and USEPA oversee the investigation and remediation of regulated contaminated sites and groundwater plumes. SCWA will continue to review available information concerning known contamination near the 33 source wells, coordinate with the responsible regulatory agencies, and manage pumping and treatment as appropriate to protect source-water quality and ensure that water delivered to customers complies with all applicable drinking-water standards. Available monitoring indicates that raw-water quality at the proposed source wells is currently good to excellent. Based on the existing permits, available capacity, monitoring data, and current plume information, SCWA does not consider a comprehensive capture-zone inventory or contaminant-specific solute-transport model necessary for this project at this time. If monitoring results, regulatory investigations, plume information, or pumping conditions indicate a material potential for contaminant migration toward a source well, SCWA would undertake additional evaluation and implement appropriate pumping, monitoring, or treatment measures in coordination with the applicable agencies.

Comments WTM-2, WTM-7, WTM-12: Unaddressed Surface Water Depletion and 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.

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. 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.

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

Response: The water table drawdown shown in the memorandum in Appendix B of the DEIS is based on annual averages. While there will be times when drawdown is greater during peak demand there are also times when it will be less than what is shown when the wells are off for extended periods of time. Water supply wells are generally run at a specific pumping rate (unless equipped with a variable frequency drive) for a given number of hours per day. Then they are shut down for hours of the day. It's the long term loss of water that is creating the plotted drawdown, which includes pumping during peak demand. The reasonably anticipated impacts from the pumpage required to support the project were analyzed by CDM.

In addition, as previously discussed, the wells that are proposed as source wells for the Phase 2 service area have already been determined to have the necessary excess capacity to serve the identified service area, NYSDEC reviewed the well applications, and the required permits based on those capacities were granted and are currently in-place.

2.6.5 Water Use and Water Conservation

Comments H1GD-7, H1GD-11, WRM-2, H2AK-1, H2BM-1, H2BM-2, H2AK-2, H2ES-3, WJSc-1, WSD-2, H2PB-6, H2MDC-1, H2MDC-2, WST-3, H2DR-2: The commenters urge SCWA to treat long-term water conservation as a primary component of water-supply planning rather than as a secondary measure after expanding supply. They question whether stronger demand-

management measures—including irrigation efficiency and scheduling requirements, reduced lawn watering, tiered billing, leak reduction, conservation education, incentives and disincentives, native or drought-tolerant landscaping, and alternatives to water-intensive turf—could reduce peak summer demand enough to lessen, defer, or avoid additional supply infrastructure. The comments cite continued automatic irrigation during and after rainfall, substantial water use by seasonal and waterfront properties, and concern that extending public water could encourage additional lawn irrigation, fertilizer use, runoff, and nitrogen loading to groundwater and surface waters. They commend Southold’s conservation law and related outreach, but call for broader, coordinated action and consistent public messaging among SCWA, the Town of Southold, the Town Trustees, the Village of Greenport, and other municipalities. The commenters characterize the proposed main as addressing immediate drinking-water and fire-flow needs but not the underlying long-term demand problem, and request stronger SCWA leadership, education, incentives, and regulatory collaboration to conserve the region’s shared and limited groundwater resource.

It sounds, also, that you put in thousands of dollars to -- thousands and thousands of dollars giving people rain gauges and shower sensors, but it was kind of dismissive. Let’s work with organizations, and environmental organizations so that people will think about putting in the native plants, not only the hundred feet, again, from the water that our Trustees work with, but a lot more.

Response: The comments are acknowledged. SCWA has supported and will continue to promote water-conservation education, strategies, and techniques as components of long-term water-supply planning, particularly during peak summer periods when outdoor irrigation can substantially increase demand. The DEIS recognizes conservation as a useful demand-management tool. Based on the analyses presented, however, conservation by itself is not anticipated to meet the project’s stated water-quality, public-health, fire-flow, pressure, reliability, and resiliency objectives. Conservation would therefore remain an important complementary measure that could reduce peak demand, improve operational efficiency, and lessen stress on the water-supply system.

In 2010, the Suffolk County Water updated its Water Conservation Plan, first adopted in 1989, and re-focused it into a more comprehensive program. New York State Environmental Conservation Law (ECL) Section 15-1503 requires that, as a condition of a water supply permit, applications must contain “...in accordance with local water resource needs and conditions, a description of the applicant’s near term and long range water conservation program...”

In 2017, New York State Codes, Rules and Regulations Title 6 Chapter V Part 601.10 required a Water Conservation Plan to be submitted to the NYS Department of Environmental Conservation by water suppliers. The Water Conservation Plan annual reporting form is updated yearly.

SCWA's conservation efforts include continued public education, seasonal watering guidance, leak detection, metering and billing tools, efficient irrigation practices, and promotion of drought-tolerant landscaping. SCWA also continues to partner with towns and other jurisdictions on locally administered measures, such as odd-even watering restrictions. Conservation measures can reduce discretionary outdoor water use and help manage peak demand; however, the amount of offset depends on customer participation, land-use patterns, seasonal weather, irrigation practices, and the enforceability of local restrictions. SCWA will continue to consider conservation performance, demand trends, and opportunities for additional efficiency measures as part of project implementation and ongoing water-supply planning. SCWA acknowledges the Town of Southold's approval and anticipated implementation of its recent water-quality plan and supports consideration of comparable conservation planning by other Suffolk County towns and villages. SCWA provided input on the Town's recently adopted conservation plan and remains available to discuss additional feasible measures and potential improvements to existing programs.

Also, as mentioned by the commenters, it is important that all towns and water districts have conservation plans and ensure they are implemented and enforced and their jurisdictional population is well educated. Section 2.1 of the DEIS includes an in-depth discussion of SCWA's existing groundwater and drinking water conservation programs. SCWA is open to working with area towns, villages, local agencies and organizations to support conservation as a water saving strategy.

Comment H2MDC-3: The other thing, I'm not sure if you guys have ever considered doing research on gray water infrastructure instead of just using our clean water, our drinking water to water the lawns and all of that. I mean, grey water infrastructure does happen in Europe and other places, you know. So, that's one of the other ideas.

Response: Greywater reuse for landscape irrigation could reduce demand for potable water. The DEIS discusses water conservation, private wells for non-potable uses where appropriate, storage, and other supply alternatives, but it does not evaluate a greywater system as a project alternative or quantify potential savings. A greywater system would require site-specific design and review of treatment, public-health safeguards, plumbing requirements, and applicable approvals. Because such systems would address selected non-potable uses at individual properties rather than provide routinely monitored potable water, system pressure, emergency supply, or fire-flow capacity, the DEIS does not establish that greywater reuse would meet the

project's full objectives. Greywater reuse is nevertheless acknowledged as a demand-management option for further consideration.

Comments H1GD-8, H1GD-9, H1GD-10, WNB-1, H2NK-4, H2ES-1, WST-4: These comments raise related concerns regarding coordination among SCWA, Town and Village officials, Town Trustees, and the County on conservation measures before additional supply is advanced. The comments ask whether SCWA will work with local governments to design and implement conservation and irrigation standards, including standards for new public-water hookups in Orient, Phase 1 service areas, and future construction; whether local jurisdictions will be partners rather than simply assigned enforcement responsibilities; whether more aggressive tiered billing or other conservation tools should be considered; and whether SCWA will report conservation-program performance to the Towns on a regular basis comparable to proposed groundwater or base-flow monitoring.

On water conservation, which for me is really a top priority here, we really need to look at closer collaboration between the Water Authority, the towns, and the villages. The time to have this discussion is before we boost supply, not after we do it.

I know you have done some tiered billing, which is good, but we need to get more aggressive with that, especially as we're looking at boosting the supply out there are significantly.

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 The plan to have a tiered billing system. That is the only motivation to get people to cut back on their profligate waste of water.

It's important that our Board of Trustees gets involved with this project. The Trustees of Southold look forward to working together with SCWA to ensure Southold Town residents have access to clean drinking water and to hearing from you.

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.

The Southold Board of Trustees 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.

Response: The comments are acknowledged. SCWA will continue to partner with affected Towns, Villages, Suffolk County, and other local partners to identify feasible water-conservation measures, refine existing programs, and support public outreach and demand management. SCWA can provide technical information, usage data, customer education, and operational input to local conservation discussions; however, land-use controls, irrigation ordinances, zoning standards, open-space preservation, and local enforcement are generally administered by municipalities or other agencies with jurisdiction. Effective conservation therefore requires SCWA participation together with local governmental action where local laws or enforcement are involved.

For new public-water connections, including future hookups in Orient and other service areas, conservation and irrigation standards can be considered by the Town and other jurisdictions during final design, service-extension planning, and implementation. Such measures could include customer education, efficient irrigation guidance, seasonal watering limits, where adopted locally, drought-tolerant landscaping, and review of usage trends after service is established.

Comment WAK-6: 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 the baseline (Appendix B, page 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 (page 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"

(page 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 (page 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.

Response: The DEIS demand projections use the historical service and production data described in Appendix B of the DEIS, including the 2024 baseline, and apply the stated growth assumptions to estimate future demand.

The Authority has a conservation program. In 2010, the Suffolk County Water updated its Water Conservation Plan, first adopted in 1989, and re-focus it as a more comprehensive program. New York State Environmental Conservation Law (ECL) Section 15-1503 requires that, as a condition of a water supply permit, applications must contain "...in accordance with local water resource needs and conditions, a description of the applicant's near term and long range water conservation program..."

In 2017, New York State Codes, Rules and Regulations Title 6 Chapter V Part 601.10 required a Water Conservation Plan to be submitted to the NYS Department of Environmental Conservation by water suppliers. The Water Conservation Plan annual reporting form is updated yearly.

SCWA's extensive water-conservation outreach efforts include the following documented activities and results:

- Radio, television and digital commercials that have gotten approximately **8.5 million impressions last summer**.
- Multiple conservation emails, totaling 529,401 contacts.
- Social media ads that have been seen by 60,000 accounts.
- Since 2024, SCWA has knocked on 1,211 doors in high-stress areas, resulting in 283 direct interactions focused on water conservation.
- SCWA's conservation podcast episode has been downloaded more than 1,045 times.
- SCWA's WaterWise Checkup Program has completed 52 checkups; participating customers subsequently averaged an approximately 18 percent year-over-year decrease in water use.
- Since 2024, the WaterWise Account Credit Program has approved 2,896 account credits totaling approximately \$378,000 for customers who installed water-saving devices.

SCWA has a meter on the single hydrant in Southold which SCWA allows tanker trucks to use. The meter recorded approximately 1.3 million gallons was taken from the hydrant in 2026. This amount is equal to the volume of water produced by a 1,300 gpm well in an approximately 17-hour period.

Comments WAK-7, WAK-8, WAK-9: The DEIS relies on conservation as mitigation but will not evaluate it as an alternative.

The five measures Appendix B rejects as an alternative (pages 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 pages S-30 and 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.

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 not necessarily be 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 (Appendix B, page 20; DEIS page 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.

Response: The DEIS discusses water conservation and additional storage as alternatives and identifies measures including locally adopted watering rules, tiered rates, irrigation pressure-reducing valves, smart controllers, and private wells for non-potable uses where appropriate. Those measures may reduce discretionary and peak-period demand and may complement the proposed project.

Comment WRM-3: By allowing more commercial properties here, the water demand is also greater. Perhaps, our leaders should curb those permits.

Response: Comment acknowledged. As discussed in the DEIS and buildout analysis provided in the DEIS, growth is largely controlled by zoning, long-range land use planning, construction of sewage treatment plants, and other factors typically under the purview and control of municipal government.

Comments WRD-6, H2BM-3, H2BM-4: 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 regulate water usage (notably residential irrigation) more effectively, 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.

Water conservation is important to the community but what is its value to Suffolk County Water Authority? You guys did a very snazzy ad campaign that was bombarding our communities. It was probably one of the best ad campaigns, so you owe your ad person a lot. How much of your budget was used for that ad campaign? I just want to make a challenge to you, as Suffolk County Water Authority leaders, that you channel that same monetary amount, and even more toward conservation efforts. And I know you are doing conservation and I know you can’t force municipalities to do things, but I just want to make sure that you have that goal, like just as an engaged community.

And you guys are, like, the smartest people I've ever heard; every time I come to a meeting I learn something new. But I want to use your smarts to better our society, and for me that means that other municipalities should have water conservation.

Response: Comment acknowledged. The comments urge SCWA to devote substantial resources to conservation and to coordinate with local governments and community organizations on practical programs. The DEIS describes SCWA's existing conservation measures, including tiered rates, the Comprehensive Water Conservation Plan, public education, and rebates, and Appendix B of the DEIS discusses additional demand-management measures.

SCWA's conservation programs are complementary to the proposed project; the DEIS does not treat advertising or voluntary measures as a substitute for the project's stated water-quality, pressure, emergency-supply, long-range sustainability, and reliability objectives.

Comment H3JN-1: We very much support clean water for everybody but you've devoted millions of dollars and a decade of outreach with little to no success in getting homeowners to reduce the use of your water for irrigation.

We would like to facilitate conversations between the Water Authority and the County Department of Health and New York State to have this line, when it's run, only be used for drinking water; and find solutions to allow people to use the existing wells that go off-line to irrigate their properties as one of many possible solutions that we can have.

Response: Comment acknowledged. Using abandoned private wells for irrigation instead of public water could reduce demand on the public system for essential uses such as drinking, bathing, and fire suppression. However, it would continue to draw local groundwater, and a portion of applied water would be lost through evaporation and plant or lawn uptake. As discussed on pages 71 and 72 of the Hydrogeologic Analysis and Route Evaluation Study report provided in Appendix B of the DEIS:

"Given the additional capacity that will be required to meet the water demands of future population in Southold, and the infrastructure required to supply and treat this quantity of water, the need for water efficiency measures is a priority. Conservation can be achieved by a number of different measures, including but not limited to the following:

1. Mandatory odd-even lawn watering rules enforced by local jurisdictions;
2. Imposition of a multi-tiered rate structure, that charges more as water use increases;

3. Pressure reducing valves between the irrigation piping and the home, thus maintaining the same flow to the system regardless of increases in water main pressure;
4. “Smart” controllers on irrigation systems which can be controlled remotely and shut down in the event of a sudden rainstorm, or can utilize regional weather data to automatically determine when a system operates and how much water it uses; and
5. Encouraging the use of private wells for lawn irrigation and other non-potable purposes.”

SCWA is open to working with all interested parties including agencies that regulate and oversee water resources, as well as local organizations and the general public to ensure Long Island’s sole source aquifer remains as a clean and sustainable water resource for future generations.

Comments H2GD-1, H2GD-2, WSD-1, H2VV-3, WAK-5: Based on what we all know, 70 percent of the water that the Suffolk County Water Authority pumps goes to residential lawn irrigation and, by some estimates, 50 percent of that water is wasted.

After the meeting, I spoke with a farmer from Riverhead who has a lot of experience with water and we talked about pricing as a tool to manage demand. And Suffolk County Water Authority did put in a two-tier pricing structure in 2020. But if you look at what’s been applied in other areas, it looks like we could go much, much further; rather, you could go much further.

When you look at SCWA’S two-tiered pricing structure compared to its pricing structure, there’s a 15 percent difference between the regular rate and the conservation rate. If you look at a place like Santa Fe, their base rate compared to their conservation rate, the highest rate is three times the amount, and they actually saw a percent decrease in water demand there with a percent increase in population.

So looking at the contention in the DEIS that water conservation alone is not enough to meet the demand that’s in the community, leaving aside that that’s not quantified in the DEIS, which I asked to actually be quantified in the final.

Looking at what the potential savings of water conservation could be if we actually really looked at a true market-based solution to conserve water. Drilling into some of the academic research technological solutions like smart gauges and sensors, behavioral changes like education, really only have a one to five percent potential in savings, but market-based solutions consistently showed 20 percent savings. And [I am] really urging the Water Authority not to merely look at themselves as a supplier of water to the community, which you do a very, very good job at, but

really being stewards who prioritize conservation of a very, very limited resource. Because that's -- as pointed out last night, in Suffolk County, our water is undervalued for how valuable that resource is. So, please look at a market-based solution, please quantify what exactly conservation savings could look at, and really consider looking at a more aggressive market-based solution.

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." 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 and 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.

And I just can't state enough that if 70 percent of this water is being used for watering lawns, what is to stop 70 percent of the new flow of water that we have coming in from just being used on a Glacial Estates? That's our personal cost.

Response: SCWA recognizes water conservation as an essential component of long-term water-supply planning and continues to develop, support, and implement conservation measures, policies and programs within its authority. The DEIS and Hydrogeologic Analysis and Route Feasibility Report identify complementary measures that may be implemented by SCWA, customers, and local jurisdictions, including mandatory odd-even lawn-watering rules where adopted and enforced locally; multi-tiered water rates that increase with higher consumption; pressure-reducing valves for irrigation systems; weather-responsive or remotely controlled smart irrigation controllers; and, where legally permissible and environmentally appropriate, use of private wells for non-potable irrigation.

These initiatives demonstrate SCWA's institutional commitment to conservation; however, program descriptions alone do not establish the amount of water saved or the effect on peak-period demand. SCWA will continue to evaluate available usage data, program participation, and seasonal demand trends; coordinate with affected municipalities regarding enforceable irrigation and land-use measures; and refine conservation programs where feasible. Conservation remains an important complementary strategy, but it does not independently address the project's documented water-quality, fire-flow, pressure, reliability, and emergency-supply objectives.

Comment WAK-5: The DEIS's own data show the shortfall is caused by a peak in lawn-irrigation 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” (Appendix B, page 24). In a typical November period, “only a fraction of wells and boosters are operating” (page 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, page 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 (Appendix B, page 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, pages 33–34). The shortfall behind Appendix B’s conclusion that the system is:

“stretched to its maximum capacity during peak periods” (page 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, page 36). It also proposes shutting down 8 chloride-affected wells and curtailing 9 others, removing 1,350 gpm of peak capacity (Table 7, pages 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, pages 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 (page 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.

Response: The DEIS documents seasonal and early-morning peak demand and explains that automatic irrigation systems commonly operate during the peak period, with demand varying by day of the week. It also documents that storage contributes to peak supply and that tank levels decline during peak demand. These facts support the commenters' observation that demand management and storage could reduce peak stress. The DEIS nevertheless identifies additional needs, including projected growth, chloride-related limits on existing wells, and the need to maintain pressure and reserve capacity for fire protection and emergencies. Appendix B compares storage and conservation measures and explains why storage alone was not selected: available wells must be able to refill tanks during off-peak periods, and continued reliance on chloride-affected Southold wells would not address the water-quality constraint.

Comment H2KS-12: Conservation, we all need to do lot better. I don't know that the answer is going to be even/odd days. You look at what's been done out west where I was born and raised, the only things that seem to work is telling people you can't lay out turf or you have to start ripping it up and incentivizing them to pull it out.

Response: Comment acknowledged. SCWA has supported water conservation through public education and conservation programs. As discussed in the Hydrogeologic Analysis and Route Feasibility Study in Appendix B of the DEIS, conservation is an important demand-management measure. Based on the analyses presented, however, conservation by itself is not anticipated to provide the routinely monitored drinking water, volume, or pressure needed to address the project's stated objectives. SCWA will continue to work with affected communities on feasible measures, including turf-reduction and native-landscaping initiatives, that could complement the proposed project and reduce demand.

2.6.5 Groundwater Conservation Recommendations

Comment WAK-13: The Town of Southold asks 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 FEIS 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" (page 72), and reconcile it with the DEIS statement that SCWA's programs have "measurably reduced consumption" (page 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" (page 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.

Response: The approved Final Scope did not specifically require evaluation of a Conservation and Storage Alternative. Appendix B of the DEIS nevertheless evaluates storage options and existing storage facilities, and both Appendix B and the main text discuss water-conservation measures. These measures may reduce peak demand and complement the proposed project. Based on the analyses presented, however, they are not anticipated by themselves to address the full range of identified needs and objectives, including potable-water quality, adequate pressure, long-term reliability and sustainability, and emergency supply. The conservation, storage, reuse, and

demand-management measures raised by the commenters may inform future water-supply planning and project implementation. SCWA notes that the siting of sewage treatment plant outfall locations or relocating them are outside SCWA's jurisdiction.

2.7 Ecology and Habitat

Comments WAA-1, WAA-2, WAA-3: 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 could mobilize sediment and increase sedimentation and turbidity, potentially affecting 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 encourages the Suffolk County Water Authority to further examine the long-term environmental impacts this project will have on such a critically important ecosystem that already faces continuous challenges.

Response: Potential effects on wildlife and habitat would occur primarily during construction and are expected to be temporary and localized. As described in the DEIS, construction would occur mainly within busy, previously disturbed road rights-of-way, where existing clearing, grading, paving, drainage improvements, utilities, sidewalks, driveways, and adjacent development have already altered habitat conditions. The avoidance and mitigation measures identified in the DEIS, together with the additional measures described in **Section 1.6** of the FEIS, would minimize clearing and ground disturbance; control erosion, sedimentation, turbidity, noise, and construction traffic; protect adjacent wetlands and surface waters; and restore disturbed areas after construction. Some temporary noise and traffic disruption would remain unavoidable, but with implementation and oversight of these measures, significant adverse impacts to adjacent habitat, wildlife, submerged aquatic vegetation, or benthic resources are not anticipated.

Long-term maintenance of the buried water main is expected to be infrequent and would generally be conducted from existing road rights-of-way or designated access points. If repair work is required near the Peconic River or other sensitive resources, SCWA would apply the same site-specific avoidance, containment, erosion- and sediment-control, material-management, site restoration, and agency-coordination measures required for construction. These controls would minimize the sediment disturbance, turbidity, and impacts to wetlands or aquatic habitat during future maintenance activities. Effects on stream baseflow are expected to be minimal. SCWA would apply for the appropriate permits if a maintenance activity required disturbance of a roadway, unless an emergency condition existed.

Before construction or maintenance of infrastructure at the Peconic River crossing and other sensitive work areas, SCWA would document existing conditions within the anticipated limits of disturbance and adjacent resource areas, as appropriate to the work. Construction inspections and post-construction restoration inspections would be used to verify implementation of required controls, identify erosion, sedimentation, turbidity, or restoration deficiencies, and direct corrective action where necessary. The scope and timing of such documentation and inspections would be coordinated with applicable regulatory agencies during final design and permitting.

2.7.1 Consultation with Local Environmental Organizations

Comment H2RR-1: Nowhere in the presentation did you mention that you were going to work with people who are the conservation leaders in the community such as Re-Wild Long Island-North Fork, North Fork Environmental, the Peconic Bay Keeper, and local civic associations. The agencies that she mentioned in addition to the town, which has done a magnificent job, but there are groups that you could actually speak to that have started the work and might offer suggestions to you.

Response: SCWA recognizes that local environmental organizations, civic associations, municipalities, and other community stakeholders can provide valuable knowledge and practical recommendations regarding water conservation, habitat protection, and local water-resource conditions. SCWA has engaged agencies, community organizations, and members of the public on water-supply and conservation issues and will continue that outreach during final design, project implementation, and future long-term water-supply planning. This engagement may include organizations such as ReWild Long Island–North Fork, North Fork Environmental Council, Peconic Baykeeper, and local civic associations, as appropriate. SCWA will also continue to provide public information through community meetings, its annual Drinking Water Quality Reports, its official website, and its long-range strategic plans and planning processes. These resources describe water sources, treatment, monitoring results, conservation measures,

infrastructure improvements, water-resource challenges, and strategies for protecting Suffolk County's drinking-water supply.

2.8 Land Use

Comment WJS-43: 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.

Response: The DEIS identifies construction scheduling, access coordination, traffic control, advance notification, public outreach, and restoration measures to avoid or minimize potential impacts on local businesses, special-event venues, and other properties along the proposed routes. The principal measures are summarized below:

- **Avoiding busy seasons and major events**
 - To the extent practicable, SCWA would schedule road openings and work that could substantially interrupt traffic outside the busiest summer and fall periods and around major events along the route.
 - Work will be avoided during the busy fall season, identified as Labor Day to mid-November, when traffic is heaviest.
 - Construction scheduling will account for vineyards, farmstands, pumpkin fields, and other seasonal or special-event traffic generators.
- **Scheduling work to reduce business and event disruption**
 - Work near major intersections will be scheduled, during less busy periods.
 - Work will avoid peak tourist activity and rush hours when practical.
 - To the extent practicable, directional drilling and other work with the greatest potential to disrupt traffic would be scheduled outside the busiest summer and fall periods. NYSDOT may require overnight work or trenchless installation at certain State-road locations to reduce daytime traffic impacts.
 - NYSDOT may require overnight work on State roads to reduce daytime traffic impacts or directional drilling in some locations.
- **Maintaining access for landowners and properties**
 - Before construction begins in a given area, SCWA and its contractors would coordinate with affected businesses, event venues, and property owners regarding anticipated work dates, access needs, deliveries, customer circulation, and known

special events. Construction sequencing and temporary access measures would be adjusted where practicable to reduce disruption.

- Access and egress to properties will be maintained when needed. If necessary, trenches may be immediately backfilled along an access/egress, or temporary steel plates or ramps may be installed so vehicles can exit or enter a site.
- Because installation generally advances 300–400 feet per day, or up to 600 feet per day in some shoulder areas, impacts to individual properties are expected to be brief.
- **Traffic control and alternative circulation**
 - Trained flagmen, signage, lighting, cones, barrels, and temporary detours or alternative route signs will be used to maintain traffic flow and safety.
 - Temporary signs and public outreach will help local drivers understand where work will occur each day and when detours or alternate routes should be used.
 - Emergency vehicles will be given priority passage through work zones.
- **Reducing construction footprint and staging conflicts**
 - Daily work areas, staging areas, and pipe installation sections will be identified in advance.
 - Equipment, pipe sections, and materials will be staged in the safest and least disruptive locations.
 - Wide shoulders will be used where available to reduce lane closures and effects on passing traffic.
- **Protecting sensitive community locations**
 - Precautions will be taken in bus or transit pickup zones, school zones, and school crossing areas.
 - Extra awareness and safety controls are identified near sensitive locations such as Oysterponds Elementary School and Aquebogue School.
- **Minimizing nuisance impacts**
 - Construction noise will be limited primarily to typical weekday daylight hours unless permit requirements dictate otherwise.
 - Noisy work near sensitive receptors (e.g., schools) will be scheduled to reduce impacts where possible.
 - Equipment idling will be minimized to reduce noise, exhaust, and greenhouse gas emissions.
 - Dust will be controlled by wetting soils when needed, especially in open or windy areas.
- **Restoration after construction**
 - Disturbed road areas will be restored or repaved, including repaving and restriping as needed pursuant to the requirements of all permits.
 - Unpaved shoulders and disturbed areas will be regraded and reseeded.

- Overgrown vegetation may be pruned where necessary, which the document notes may provide some roadside maintenance benefit.
- **Public notifications and opportunities to provide input**
 - During construction, SCWA will update its dedicated North Fork main webpage to provide real time information regarding the schedule, active work locations, anticipated traffic changes, project progress, and public-safety recommendations.
 - An online forum will be provided on the SCWA's official website to allow the public to provide input or ask questions.
 - Reasonable efforts will be made to inform landowners when work is proposed nearby.

With these measures, construction-related impacts, which are expected to be temporary, localized, and manageable, will be further minimized. SCWA would avoid peak business and event periods where practicable, maintain access to affected properties, coordinate directly with business and property owners, provide timely construction and traffic information, protect public and worker safety, and restore disturbed areas after construction.

Comment WRD-12: 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.

Response: Phase 1 of the water main installation will be conducted within the Cross River Drive right-of-way and not within Indian Island Park. As discussed in the DEIS:

"Construction traffic and long-term transportation related impacts along the two routes and in the future service area will be avoided, controlled, minimized and mitigated to the maximum extent practicable through the implementation of those standard and project specific methods and strategies determined to be appropriate for this project to address identified issues of concern. In addition, it should be noted that SCWA has corresponded with the Suffolk County Department of Public Works ("SCDPW") to determine if there would be any special restrictions on main installation along Cross River Drive (CR-105). By letter dated April 25, 2025, SCDPW's Chief Engineer wrote":

"Upon further review of the additional information provided by Suffolk County Water Authority for the above-referenced project relative to its SEQRA submission submitted to this office on August 5, 2024, the Suffolk County Department of Public Works, Traffic Engineering Permits Section, can clarify that while access to

CR 105 right-of-way between Indian Island Park and from Hubbard Avenue to Union Avenue continues to not be permissible, the Department has no objection to work within those portions of the right-of-way that are outside of the pavement area wherever possible and upon further review. Any additional requirements related to construction and restoration will be determined upon submission to the Department of detailed plans along with the permit request.”

See Appendix H-2 of the DEIS for a copy of the original SCDPW correspondence.

2.9 Zoning

Comment WJS-7: The Preferred Alternative Booster Station is located within the Town of Riverhead’s Rural Corridor Zoning District. The Preferred Alternative Pumping Station is not consistent with Town zoning.

Response: The Preferred Alternative booster-station site is within the Town of Riverhead Rural Corridor zoning district, and SCWA acknowledges the Town’s concern that the facility may not conform to zoning standards applicable to private development. As discussed in the DEIS and related Monroe materials, SCWA’s activities are immune from local review. That jurisdictional position does not eliminate SCWA’s obligation under SEQRA to evaluate the facility’s potential land-use, community-character, visual, operational, traffic, noise, lighting, wastewater, solid-waste, and emergency-service impacts and to identify practicable measures to avoid or minimize those impacts to the maximum extent practicable.

The booster station would be housed in a small, approximately 27-foot-8-inch by 27-foot-8-inch building with a footprint of about 765 square feet. The developed area would also include a paved driveway, a few parking spaces for inspection and maintenance personnel visits, a small generator, and a transformer; the remainder of the property would remain undisturbed, vegetated, and unpaved. Because the facility would be unmanned, routine traffic would be limited to a daily inspection and occasional maintenance visits by one or two personnel, and its energy demand would be relatively small compared with regional electricity supply and other area land uses. The emergency generator would have a fuel tank with a capacity of 1,000 gallons or less—which is below the applicable permitting threshold—and would incorporate the following safeguards:

- secondary containment to substantially reduce the potential for a fuel release;
- a fuel-level gauge and alarm panel indicating high, full, and low fuel levels;
- leak-detection controls;
- compliance with all other applicable fuel-storage and safety requirements; and

- daily inspection by trained personnel.

Exterior lighting would be limited to that necessary for site security and emergency inspection, maintenance, or repair. Fixtures would be directed downward and toward the areas requiring illumination to minimize light trespass. The facility would not require potable-water service, generate or discharge sanitary wastewater onsite, or routinely generate solid waste. Construction debris and limited maintenance-related waste, such as repair-part packaging, would be removed from the site and properly disposed of offsite by the contractor or SCWA personnel.

As a nonresidential, unmanned use, the booster station is not anticipated to affect the local school district and is expected to require limited police, fire, or ambulance service. The one-story building would be substantially set back from the road, centrally located from east to west to maximize separation from Cross River Drive and the adjoining eastern property, and enclosed by fencing. Its small footprint, brick walls, gabled roof with architectural shingles, and retained vegetation would help the facility resemble a modest utility or residential-scale structure and reduce its visibility from neighboring properties.

The booster station is not expected to be visible from Main Road and may be only partially visible from Cross River Drive. Pumps would be enclosed within the building, water mains would enter and exit below grade, and the emergency generator would be housed in a sound-attenuating enclosure. Together with the site setbacks, fencing, and retained vegetation, these features would minimize visual and noise effects on neighboring properties.

The proposed booster station is essential to operating the water system and delivering potable water at the volume and pressure needed for domestic, commercial, and firefighting uses. The facility would therefore support the public health, safety, and general welfare of the communities served.

The DEIS evaluates the booster station's potential land-use, community-character, visual, noise, lighting, traffic, operational, and emergency-service effects and identifies measures to avoid or minimize those effects. Given the facility's limited footprint, unmanned operation, setbacks, vegetative screening, enclosed equipment, restricted lighting, building design, infrequent service visits, and general compatibility with rural residential uses, the booster station is not anticipated to result in significant adverse land-use or community-character impacts, notwithstanding concerns regarding consistency with the Rural Corridor zoning district.

Finally, booster-station siting is influenced by hydraulic requirements, including the location at which additional pressure is needed to maintain water conveyance and reliable service and

pressure. Similar siting considerations may apply to other essential public-water facilities. The Riverhead Water District's Cross River Drive–Northville Turnpike facility, for example, is not listed as a permitted or special permit use in the Town's Agricultural Protection Zone under § 301-36 of the Town Code and may raise similar consistency questions under the district's stated purpose and intent in § 301-35. However, it is understood, that siting an essential facility such as that requires some flexibility to achieve public health, safety and general welfare considerations. This comparison illustrates the need to consider both local land-use objectives and the operational requirements of essential infrastructure.

2.10 Noise

Comments WBB-9, H3BB-14: To mitigate noise and reduce vibration impacts, the DEIS describes a specific construction plan within 90 feet of all listed and eligible historic structures. This mitigation should also be employed in the vicinity of other noise and vibration sensitive receptors such as schools, churches, day care centers, etc.

Response: Comment acknowledged. The DEIS noise and vibration mitigation for work near historic structures addresses construction-related vibration and noise risks associated with sensitive buildings. The same general construction-noise controls identified in the DEIS, including equipment maintenance, exhaust silencers, limits on idling, and sound barriers for work outside normal hours where required, apply to construction generally. Work scheduling and site-specific controls would be coordinated as appropriate near other noise-sensitive receptors, including schools, churches, and day-care facilities. The DEIS does not establish a separate 90-foot vibration-monitoring zone for every such receptor; the applicable controls depend on the work, receptor, project scheduling, and need.

Comment WJS-48: 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 BJ's, 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.

Response: As discussed in Section 4.4 of the DEIS, temporary construction-related traffic delays and access disruptions cannot be eliminated entirely. Consistent with SEQRA, SCWA would avoid or minimize those impacts to the maximum extent practicable through construction scheduling,

traffic controls, access coordination, advance notification, and other measures identified in the DEIS. Any remaining unavoidable impacts would be considered together with the project's public-health, social, and economic benefits in the SEQRA findings process.

"...impact prevention and mitigation measures are provided where feasible, to minimize any identified impacts to the maximum extent practicable as required by 6 NYCRR Part 617, SEQRA. Some impacts from the Proposed Action and its future implementation, however, are unavoidable or cannot be fully mitigated regardless of the mitigation measures employed, and SEQRA requires that these unavoidable impacts be identified."

"Unavoidable environmental impacts are those that cannot be prevented or further mitigated by applying reasonable and feasible mitigation strategies and techniques. It should be noted, however, that not all unavoidable impacts are significant. These impacts include those that have been or will be mitigated to the maximum extent practicable through project planning and design by experienced professionals; changes to project plans based on emerging technologies or processes; requirements and recommendations provided by involved and interested agencies and the public; new information or ideas obtained during environmental review; compliance with the requirements of conditional permits and approvals from other agencies, and implementation of effective, reasonable, and feasible impact minimization methods."

Traffic mitigations are detailed in Section 3.3.3, "Traffic" and Section 4.1, "Construction-Related Impacts" of the DEIS.

2.11 Traffic

Comments WGJC-1, WJC-1: 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.

Response: The project is not currently planned as a continuous, multi-year construction effort. If Phases 1 and 2 were undertaken consecutively, the combined construction period is conservatively estimated to take 12 to 18 months; Phase 1 construction along Main Road would be shorter and is expected to take less than one year. The DEIS identifies construction, traffic, environmental, cultural-resource, utility-coordination, access, and emergency-response measures applicable to this segment. These measures would include maintaining access to

residences and businesses, coordinating with emergency-service providers and roadway agencies, protecting historic resources and utilities, and implementing applicable wetland controls. Compared with the Sound Avenue route, the Main Road route is substantially shorter and includes wider paved and unpaved shoulders, particularly along the north side. These conditions would provide more space for construction and staging, reduce interference with active travel lanes, and improve traffic flow and worker and public safety.

Wetland impacts would be avoided or minimized through the numerous wetlands mitigation measures identified in the DEIS. Near Aquebogue Elementary School and Oysterponds Elementary School, SCWA and its contractors would coordinate construction scheduling and implement additional traffic and safety controls to minimize interference with school operations, including avoiding or minimizing work within bus and transit pickup areas, school zones, school access points, and other locations where construction could obstruct student, pedestrian, or vehicle movements. The top priority in any work zone is public and worker safety. All effort and precaution will be taken to meet this goal.

Comment WGJC-2: Detouring traffic [from Main Road] to Peconic Bay Boulevard, 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.

Response: Any recommended detour would be developed in coordination with the agencies having jurisdiction considering roadway capacity, bridge and weight restrictions, railroad crossings, traffic conditions, safety, emergency access, and the suitability of available alternate routes. Construction would not necessarily require all traffic to be redirected to a single roadway such as Peconic Bay Boulevard. If and where detours are necessary, traffic would be directed among appropriate alternate routes through signage and traffic-control measures to avoid concentrating excessive volumes on local roads that are not suited to accommodate them. Some local drivers may independently choose other familiar routes to avoid work zones. The construction traffic-control plan would be designed to maintain access and minimize adverse effects on Peconic Bay Boulevard and surrounding residential roadways to the maximum extent practicable.

Comments WJS-26, WJS-37, WJS-38, WJS-39, WSLM-9: 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).”

(emphasis added)

There were no 24-hour or peak hours traffic counts provided in the DEIS for the proposed Action (Sound Avenue) or Preferred Alternative (Route 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.

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.

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?

The intersection of Flanders Road (State Route 24) and Cross River Drive (County Route 105) in Southampton 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 9 AM or after 3 PM and explore night work when the roadways are to be impacted).

Response: The DEIS identifies the general seasonal and daily traffic patterns relevant to construction scheduling. On the North Fork, traffic is generally heaviest on summer weekends and during the autumn harvest and pumpkin season, which extends from mid-September through October, as discussed in the Town of Riverhead Comprehensive Plan Update reviewed during preparation of the DEIS. Peak weekday travel periods are expected from 6:30 to 9:30 a.m. and from 3:30 to 6:30 p.m. Before construction, SCWA would coordinate with the State and County roadway authorities to confirm applicable traffic conditions and determine whether supplemental route-specific counts or other traffic observations are required for final traffic-control plans. Those plans would address Main Road, Sound Avenue, Peconic Bay Boulevard, and affected intersections and would consider motorists, trucks, pedestrians, bicyclists, emergency vehicles, school transportation, and access to businesses and residences. Final scheduling would also account for winter weather, paving limitations, deicing, snow plowing and removal, and seasonal commercial activity. Work-hour restrictions, including limits on nighttime, weekend, holiday, school-arrival and dismissal, and peak-commute-period work, would be established through roadway permits and final construction planning. The project manager would finalize and oversee the schedule and adjust traffic controls where field conditions warrant.

No work is anticipated within the Flanders Road and Cross River Drive intersection. The proposed main would tie into an existing SCWA main located north of the intersection within the paved shoulder area.

Comments WJS-31, WBB-5, H3BB-7, H3BB-8, WSLM-10: The DEIS/FEIS does not provide sufficient traffic analysis for the proposed construction routes, including traffic counts, traffic patterns, seasonal variations, or detailed assessment of impacts on local schools. Specifically, the document does not adequately evaluate potential traffic and construction-related effects along Route 25 near Aquebogue Elementary School, including impacts on school bus operations, parent drop-off and pick-up activities, and staff access. What traffic impacts are anticipated in this area,

and what specific mitigation measures will be implemented to maintain safe and efficient school transportation and access during construction?

You mentioned traffic safety protocols around the Oyster Pond School which has a student population of 90, and that's noteworthy except that the school is in Orient and this phase of the project will not be built any time 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 mobile roads to utilize. The FEIS fails to adequately address this.

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.

Response: Traffic and construction-related impacts near Aquebogue Elementary School are expected to be temporary and localized. To protect public safety and minimize disruption, SCWA and its contractors would coordinate with the school and applicable transportation and roadway agencies having jurisdiction before work reaches the school area. Site-specific traffic-management and construction plan comparable to the safeguards proposed near Oysterponds Elementary School would be implemented. The plan would address school arrival and dismissal periods, bus routes and stops, parent drop-off and pickup, staff access, pedestrian and bicycle movements, emergency access, temporary traffic controls, and advance notice. These measures would be implemented to maintain safe and efficient access for students, parents, school staff, pedestrians, bicyclists, and motorists throughout construction.

Several existing site conditions reduce the potential for significant school-related impacts near Aquebogue Elementary School. Construction would occur along the north side of Main Road (Route 25), where a wide striped shoulder, utility strip, grassed area, and sidewalk provide space for work activities and equipment staging outside of active travel lanes. In addition, the roadway consists of one travel lane in each direction with a posted speed limit of 30 mph and existing school-zone signage. The proposed water main installation would advance incrementally, generally at a rate of approximately 300 to 400 feet per day and up to 600 feet per day in some areas, which would limit the duration of construction activity in any one location.

To further minimize potential impacts, SCWA and its contractors will coordinate construction schedules to avoid school arrival and dismissal periods, peak traffic hours, and other periods of heightened roadway activity to the extent practicable. Temporary traffic control measures, including trained flaggers, warning signage, orange cones or barrels, lighting, and detour signage

where necessary, will be implemented in accordance with applicable permit requirements and traffic safety standards. Construction activities will be planned to avoid blocking school access points, bus stops, pedestrian routes, bicycle routes, and adjacent driveways. Appropriate measures will be taken to safely accommodate pedestrians and bicyclists through work zones at all times.

Additional measures will include minimizing equipment staging and material storage within travel corridors, locating stockpiles as far as practicable from the school and active travel lanes, reducing unnecessary equipment idling, and maintaining access to all adjacent properties during trenching operations. Because work progresses continuously along the corridor and only remains in any one location for a short duration, temporary disruptions to school operations, bus movements, parent drop-off and pick-up activities, and local traffic circulation are expected to be brief.

Following construction, all disturbed roadway, shoulder, pavement marking, and associated roadway features will be restored in accordance with applicable permit requirements. SCWA will continue to coordinate with the New York State Department of Transportation (NYSDOT) and comply with all permit conditions and traffic management requirements associated with work along Main Road (Route 25). Accordingly, significant adverse impacts to Aquebogue Elementary School, school transportation operations, or pedestrian and roadway safety are not anticipated.

As with any landowner, the School would be notified of pending work in front or near the school so it can take any precautions necessary.

Before construction begins, SCWA would provide advance notice to the Town identifying the anticipated schedule, active work locations, expected traffic changes, detours or access restrictions, and public-safety recommendations. SCWA would also provide current construction information through the online resources described in **Section 1.6** of the FEIS so the Town can distribute public service announcements through its website and social media accounts.

Traffic patterns are understood with east–west travel largely limited to Sound Avenue, Main Road and to a lesser extent, Peconic Boulevard.

SCWA notes that it has installed over 3,000 feet of main along state roadways in the past two years. All of this work was done in coordination with the NYSDOT. This experience has helped to inform this project to minimize any adverse construction impacts to the maximum extent practicable.

2.12 Utilities and Infrastructure

Comments WJS-4, WGJC-3, WJS-18: The commenters contend that the DEIS and engineering plans do not provide sufficient design detail to determine the precise location of the proposed water main and associated infrastructure or adequately depict existing utilities within the project corridor. Specifically, the commenters note that existing gas, electricity, telecommunications, and other utility infrastructure are not clearly identified on the project plans, making it difficult to assess potential conflicts with existing facilities, including the Town of Riverhead's water mains and hydrants. The commenters express concern that installation of the proposed SCWA water mains in close proximity to existing municipal infrastructure could create future maintenance, repair, and operational conflicts. It is also asserted that additional municipal review and utility coordination are necessary to identify potential conflicts, avoid impacts to existing infrastructure and nearby public and private properties, and to ensure appropriate mitigation measures are implemented to the maximum extent practicable.

Response: The comments are acknowledged. As project sponsor and owner and operator of the proposed facilities, SCWA has a direct interest in identifying and addressing potential conflicts with existing water, gas, electric, telecommunications, drainage, and other infrastructure before construction. The DEIS and preliminary engineering plans provide the level of detail used for the environmental review, while final utility locations, clearances, crossings, protection measures, and design adjustments would be confirmed during final design through field investigations, utility mark-outs, record review, and coordination with affected agencies and utility owners.

SCWA would coordinate the final alignment and construction approach to maintain appropriate separation from existing infrastructure and to avoid or minimize future maintenance, repair, and operational conflicts affecting SCWA, Riverhead Water District, or other utility facilities.

Before construction, SCWA would review available utility records, conduct field investigations and required utility mark-outs, and coordinate with affected municipalities and utility owners. Final plans would establish the horizontal and vertical alignment, required clearances, crossing details, protection measures, and construction methods. Where conflicts are identified, SCWA would adjust the alignment, installation method, or sequencing to protect existing facilities, maintain service, and preserve access for future maintenance and repairs.

As required by NYS 811 law, utility markouts are required before any mechanized excavation could begin. When SCWA installs water main in areas with infrastructure of multiple entities, SCWA'S water main is either offset up or down to avoid crossings with service laterals or mains owned by the district. In the case of the North Fork Water Main, which will be 24" in diameter, SCWA will offset the main below the district main in all cases as there will not be enough cover

on top of the main to offset upwards over a conflict. This will result in a clear pathway above the new main if the district has to install future services laterals. When water main is installed parallel to existing utilities, minimum separations are maintained, typically 18"-36", given the specific type of utility. Along Main Road where SCWA'S water main will run parallel to Riverhead Water District's main, typical separation will be 5 feet. Much of Riverhead's Water Main on Main road is in the grass behind the sidewalk and the SCWA will be installed in front of the curb line in the paved shoulder. This will provide ample separation so as not to disturb the district's facilities.

The Town of Riverhead and other involved and interested agencies have had opportunities throughout the SEQRA process to review the project, identify concerns, recommend mitigation, and comment on the preliminary plans. The FEIS addresses the comments received. Potential utility conflicts would be evaluated and addressed during final engineering design through interagency and utility coordination, permitting, mark-outs, and standard construction practices. With those measures, significant adverse impacts associated with utility conflicts are not anticipated.

On the preliminary plan sheets, the line labeled "G" represents an existing natural-gas line; National Grid provides natural-gas service in the project area. The DEIS drawings support environmental review and are not final construction documents. Final design and construction plans would include applicable legends, verified utility information, ownership details, and conflict-resolution measures. Before construction, SCWA would coordinate with National Grid and other utility owners to verify locations and incorporate any necessary protection or design measures. See response to Comments H3FM-1 and H3FM-2, below.

Comments H2AA-1, H2AA-2, H2AA-3, WJS-42: I would like to raise concerns about maintenance, and what maintenance looks like on this pipeline. As well as when you drill down 30 feet. What comes out before you put the pipe in? I'm concerned about contaminants and what happens with that, you know, spoils, would you say; where that goes, how it gets tested.

How is maintenance performed and how does it further disrupt the route and environmental conditions? Because obviously if this is going in, you know at some point maintenance will be needed, maybe five or ten years from now. What does that cost? Is that cost then imposed on customers or is that part of the construction cost?

There are several service utilities (gas, water, telecommunications, and 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 hydrants along the north side of Route 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 depths of all utilities located along each of the proposed routes?

Response: The DEIS plans are preliminary environmental-review plans and do not show verified horizontal and vertical locations for every existing utility. Before construction, SCWA would confirm utility locations and clearances through record review, field investigation, required utility mark-outs, and coordination with utility owners and affected agencies. Final design and permit review would establish the alignment, crossings, protection measures, and construction methods needed to avoid conflicts and maintain existing services. Excavated material and drilling slurry would be handled, tested where required, transported, and disposed of in accordance with applicable project and permit requirements. Future maintenance would be performed by SCWA and its contractors as system operator using the procedures, equipment, and best practices appropriate to the location and condition at the time of the work. Because the location and nature of future repairs cannot now be predicted, the DEIS does not provide site-specific maintenance costs, guarantee that repairs would cause no temporary disturbance, or quantify future customer-rate effects attributable to maintenance.

Comments H3FM-1, H3FM-2: When I first saw the new plans, I was surprised to see that it seems like your intention is to run this large transmission main as close as possible to the existing 12-inch water main that serves our customers on Main Road. The plans show a number of direct conflicts where your pipe passes right through the Riverhead Water District's pipes. This represents a problem for the Riverhead Water District.

Disturbing the ground around an existing water main causes the ground to settle for years and that causes failures. The main cause there is the over pipe. This problem has been an issue for Suffolk County Water Authority in the past, when the Southwest Sewer District was installed, and they installed their piping in its service area. That led to decades of litigation between the two agencies and I'd like to try and avoid that.

The second problem is installing new service on our main will become much more complicated and expensive for our users on Main Road, because now we need to offset the big services around your pipe. In order to offset them, the main will be at least 10 feet away so I can have the ability to move the big pipe up and around yours – or under it. This is an additional cost and so it is not fair to our ratepayers, you know.

So I'm hoping we can work out something, whether we move it 10 feet away to give us a little space, or maybe a bond that, if failures do occur in the future, you guys take those responsibility for those. But as it stands now, I don't think this is particularly fair to us.

Response: The proposed route along Main Road for the North Fork Water Main project will require the Water Authority to install water main in a roadway with existing utilities. The project does not propose SCWA customer connections within the Riverhead Water District service area. In the case of Main Road, existing utilities within the right-of-way include Riverhead Water Main, gas Transmission and distribution mains and drainage structures and pipe. This is a situation the Authority is well versed in as we install 20 miles of water main a year and it is typically within roadways with a myriad of buried utilities, amongst the most challenging are high voltage electrical transmission mains and high pressure gas transmission mains.

When SCWA installs water main in areas with infrastructure of multiple entities, SCWA'S water main is either offset up or down to avoid crossings with service laterals or mains owned by the district. In the case of the North Fork Water Main, which will be 24" in diameter, SCWA will offset the main below the district main in all cases as there will not be enough cover on top of the main to offset upwards over a conflict. This will result in a clear pathway above the new main if the district has to install future services laterals. When water main is installed parallel to existing utilities, minimum separations are maintained, typically 18"-36", given the specific type of utility. Along Main Road where SCWA'S water main will run parallel to Riverhead Water District's main, typical separation will be 5 feet. Much of Riverhead's Water Main on Main road is in the grass behind the sidewalk and the SCWA will be installed in front of the curb line in the paved shoulder. This will provide ample separation so as not to disturb the district's facilities.

Comparisons have falsely been drawn between the Project and the sewer installation that occurred during construction of the Southwest Sewer District. That project required much deeper excavations that required significant dewatering operations and larger trenching where often times buried utilities needed to be supported from above. SCWA's water main project will not have any service laterals in the Town of Riverhead, so very limited crossings of the Riverhead Water District water main will occur. For these reasons, the project is not reasonably anticipated to cause significant adverse impacts to the Riverhead Water District distribution system. The two entities have demonstrated their ability to co-locate in a road, for example along Peconic Bay Boulevard.

Lastly, the DEIS plans are preliminary and do not establish final clearances from every existing Riverhead Water District main, hydrant, or service. Before construction, SCWA will coordinate with the District and other utility owners if needed to verify locations and identify conflicts; final plans will establish the alignment, separation, crossing details, and protection measures. Where

necessary, the design or construction method will be adjusted to protect existing facilities and proposed SCWA infrastructure and maintain access.

Comments H2AK-2, H2AK-3: The proposal suggests bringing public water to Orient in 2034. We've had discussions about burying the power lines in Southold and that is a conversation that needs to continue as part of that proposal, because that would be important to consider and implement at the same time.

I hope that the NYSDOT will address the historical drainage issues in Southold at the same time that the SCWA main is being installed and when [before] SCWA is doing the restoration of the road. That's a good opportunity for them to do that, or just pave it and then start to dig it up to do the drainage; either way is fine.

Response: Before construction, SCWA would review available utility records, conduct field investigations and OBTAIN required utility mark-outs, and coordinate with affected municipalities and utility owners. Final plans would establish the horizontal and vertical alignment, required clearances, crossing details, protection measures, and construction methods. Where conflicts are identified, SCWA would adjust the alignment, installation method, or sequencing to protect existing facilities, maintain service, and preserve access for future maintenance and repairs. If the Orient portion of the project were to proceed, prior to initiating that work, SCWA will contact LIPA/PSEG to see if there was an opportunity to perform both projects either simultaneously or sequentially so that road restoration costs and community disruption could be minimized.

Comments WTM-4, WTM-9, WTM-14, WAK-1: Consider construction of off-peak bulk storage reservoirs in Southampton, Southold, or both towns as an alternative. 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.

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

These comments address a central deficiency: the DEIS does not meaningfully evaluate water conservation, demand management and adding 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.

Response: SCWA's Hydrogeologic Analysis, strategic planning, DEIS and the FEIS have considered a range of water-supply issues and strategies addressing documented concerns involving water quality, groundwater levels, saltwater intrusion, available supply, system pressure, and system reliability and sustainability. The alternatives included water-main extensions along three potential east-west routes carried out in two distinct phases, as well as the following individual or potentially combined measures such as water main extension with water conservation, storage, etc.:

- Point of use and point of entry water treatment;
- Purchase water from the Riverhead water district, continue to obtain water from Southold and eastern Riverhead, using wells with capacities of 100 to 500 gallons per minute;
- Construction of additional water storage facilities;
- Water efficiency and conservation measures; and
- Desalination.

Regarding bulk storage, the Hydrogeologic Analysis concluded that water storage can help meet short-duration peak demand only if sufficient reliable source capacity is available to refill the facilities during off-peak periods. As discussed on pages 70–71 of SCWA's Hydrogeologic Analysis and Route Feasibility engineering report:

"Given that the principal water supply issue on the North Fork is meeting peak demand, further consideration must be given to ground storage and booster pumping to meet this peak demand. This alternative is already being practiced on the North Fork. A 500,000-

gallon ground storage reservoir has been constructed at the Rocky Point Road well field in East Marion, and a 2-million-gallon ground storage tank has recently been placed in service at the Laurel Lake well field.”

“The Rocky Point Road well field has six 50 gallons per minute wells, which are undersized relative to the instantaneous demand in the area. However, once the reservoir is filled, booster pumps can supply water from the reservoir during peak periods for several hours. Once the demand subsides, the well field (and the entire rest of the distribution system) can fill the tank during the remainder of the day so that it can again satisfy peak demand. This allows for lower pumping rates for area wells, which minimizes potential upconing. During the summer of 2024, these booster pumps provided 658 gallons per minute during the peak 5-hour period, in addition to the 186 gallons per minute provided directly by the Rocky Point Road wells.”

“The ground storage tank at the Laurel Lake well field in Laurel is capable of boosting 1,500 gallons per minute to the system. The main concern with these storage and booster systems is the ability to fill the tank during the off-peak periods. If this approach were to be possible, additional capacity will still be needed since many of the existing wells within the Southold Low system are impacted by chlorides and continuing to run these wells, even in the off-peak period will further exacerbate this problem. Because of the lack of a reliable source of additional water, this alternative is not feasible.”

SCWA will continue to consult with involved and interested agencies, local governments, community organizations, and the public regarding feasible water-conservation, storage measures and public education measures. Annual SCWA Drinking Water Quality Reports for its water distribution areas provide information on water-supply conditions, system needs, water quality, and conservation.

Conservation and storage can reduce peak demand and improve system operations and performance; however, storage requires a reliable off-peak source for refilling and conservation does not independently address water-quality concerns, saltwater intrusion, fire-flow capacity, system pressure, reliability, or emergency supply. SCWA therefore considers conservation and storage complementary measures rather than stand-alone substitutes for the proposed water-main extension.

Comment WAK-10: Additional storage could meet the peak. Appendix B rejects additional storage because “of the lack of a reliable source of additional water” (pages 70–71), stating that “storage tanks without the necessary, unconstrained wells to fill them are useless” (page 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, page 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 (pages 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 (pages 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 (pages 70–71). Appendix B also lists "increases in system storage capacity" among future improvements (page 6), credits "the construction of additional storage facilities" with sustaining operations (page 43), and anticipates adding storage after 2050 as one of the "traditional engineering methods of meeting peak demand" (page 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.

Response: Please see the preceding response to comments concerning water conservation and storage. Appendix B of the DEIS evaluates additional storage and explains that storage can meet

peak demand only if clean, reliable off-peak supply is available to refill the tanks before the next peak period. Although the commenter identifies theoretical off-peak capacity and estimates the storage volume needed to cover projected five-hour shortfalls, SCWA's operating experience indicates that the existing system already has difficulty restoring tank levels after peak demand. During periods of peak demand, SCWA wells may run at full capacity for long durations in attempt to produce sufficient water to refill SCWA's tanks before the next period of peak demand when the stored capacity is depleted. At times, the tanks cannot be fully restored and their water levels remain too low. Under those conditions, adding storage would increase the volume that must be refilled without increasing the clean and reliable source capacity available for that purpose and therefore would not resolve the operational constraint. Additional storage also would not address the need to reduce pumping from chloride-impacted wells so those wells can recover. For these reasons, SCWA does not consider storage alone, or storage combined with conservation, sufficient to meet the project's water-quality, pressure, reliability, emergency-supply, and fire-flow objectives.

Comments WRD-10, H2AM-2: 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.

And also, please explain how rising sea levels, climate change, and possible devastating storms will affect the pipeline where it crosses over the East Marion to Orient causeway. I realize it's going to be under the causeway, but how can you mitigate the risk of the pipe being destroyed? We know that the causeway has been cut off from the mainland many, many times over the years. So, what will you do to mitigate that risk?

Response: The Main Road causeway alignment and proposed construction methods are shown in the DEIS plans, and the DEIS evaluates the environmental setting and potential impacts at the current stage of design. During final design of the East Marion-to-Orient segment, SCWA would evaluate applicable sea-level-rise projections, coastal flooding, storm surge, erosion, scour, buoyancy, pipe loading, isolation, access, and repair conditions along the causeway. The final design would incorporate appropriate pipe materials, burial depth, joint restraint, protective measures, valves, and other resiliency features based on that evaluation and applicable standards and permit requirements. SCWA would also inform emergency-management agencies regarding inspection, isolation, temporary service, repair access, public notification, and post-storm recovery procedures. These measures would be developed before construction of that

future segment to reduce the risk of storm-related damage and interruption of public-water service.

Comment WAK-11: 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 (Appendix B, page 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.

Response: The adopted Final Scope did not require an assessment of treated discharge of treated wastewater from Greenport into the ground rather than offshore. The DEIS evaluates water-supply and conservation alternatives, including additional storage and water-efficiency measures, but does not analyze reuse or recharge of treated effluent from the Village of Greenport wastewater treatment plant as a project alternative. Any reuse or recharge proposal would require confirmation of effluent quality, treatment and recharge design, applicable approvals, and analysis of effects on groundwater and receiving waters. The comment is acknowledged as a potential regional water-management strategy, but the DEIS does not establish that it could replace the proposed transmission main or meet the project's full water-quality, pressure, fire-flow, and long-term reliability objectives. There is also nothing to suggest that injecting reuse water in the locations identified will have any impact on chloride impacted wells.

2.13 Construction Impacts

Comments WJS-27, WJS-28: 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?

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?

Response: The anticipated installation rate of 300 to 600 feet per day applies to trenching, water-main installation, backfilling, and associated work, not to final pavement restoration. Disturbed pavement would receive a temporary hot-mix asphalt patch at the end of each workday. SCWA and its contractor would inspect and maintain temporary patches as needed to preserve safe travel conditions, including during winter weather and snow-removal operations. After completion of each phase, final paving and restriping would be performed in accordance with the applicable road authority’s permit requirements and specifications. The combined 12-to-18-month estimate applies to Phases 1 and 2 if undertaken consecutively; Phase 1 is expected to take less than one year. Final paving would be coordinated with the road authority and scheduled under suitable weather and roadway conditions. The start and completion dates will depend on final project approval dates, final construction schedule and permit conditions, and for Phase 2, future funding.

Within the project limits, NYS Route 25 generally consists of concrete panels overlaid with asphalt and would be restored in accordance with NYSDOT’s Regional Pavement Repair Guide Sheets.

Comment WJS-30: 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.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in

which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court. Before work on Riverside Drive, Hubbard Avenue, or any affected Town sidewalk, SCWA would consult with the Riverhead Superintendent of Highways regarding applicable roadway-restoration standards, traffic-control requirements, and administrative procedures, while preserving its legal position concerning the applicability of local approvals to the project. In 2024, SCWA installed over 20,000 feet of water main in Riverhead for the Manorville-Riverhead Grant project under the terms of a Riverhead road opening permit. The issuance of the permit is a ministerial act.

Comments WJS-34, WJS-35: 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.

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, 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?

Response: The 10-foot dimension identified in the DEIS describes the width of the typical linear work area for water-main installation; it is not intended to contain every construction, storage, personnel, and decontamination activity at the same location. The length of staging area would range from roughly 50 to a conservative 100 feet. Work would advance in short sections, with excavation, pipe placement, backfilling, temporary pavement restoration, and equipment movement sequenced to limit the active footprint. Pipe, equipment, excavated material, suitable backfill, and worker vehicles would be placed within designated laydown or staging areas, within approved portions of the road right-of-way, or at other approved off-corridor locations, as

applicable. The Peconic River directional-drill plans in Appendix C identify a pipe laydown area approximately 10 feet wide and 1,000 feet long and staging areas of about 100 feet maximum. Where golden nematode precautions apply, cleaning and decontamination would occur in a designated controlled area separate from general staging, with wash water, slurry, and removed soil contained and managed in accordance with applicable regulatory requirements. Final construction plans would identify the limits and dimensions of active work zones, laydown and material-storage areas, decontamination areas, access routes, and any site-specific adjustments needed for utility conflicts, winter conditions, or nighttime work.

2.14 Cumulative Impacts

Comment WJS-12: 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.

Response: The Mattituck project would connect approximately 60 additional homes to the SCWA public water supply system. These homes would be assumed to be part of the normal growth experienced and planned-for in the Town of Southold.

2.15 Buildout Analyses and Growth-Inducing Aspects

Comment WRD-9: 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.

Response: The DEIS evaluates the Proposed Action, including the Phase 2 Orient Hamlet service area, and compares potential buildout in that area with and without the water-main extension. As presented in Appendix D and discussed in Section 3.1.2 of the DEIS, the analysis found a difference of five potential new single-family residences under existing zoning as discussed below:

“...the difference between the potential number of new single-family residences with and without public water is only 5. Under existing conditions, 72 new single family lots are possible while 77 lots are possible if public water were extended to the area. These new single family lots are attributed to vacant land and large single-family/ agricultural lots that can be subdivided under existing zoning regulations and lots with frontage on an existing road where a main may be installed where lots rely on conventional onsite septic systems are used. This difference in 5 houses is generally attributed to lots under 20,000 SF that would not have adequate setbacks between sanitary systems and private wells under existing conditions but would be able to build a single-family residence if it had public water. The potential for a significant increase in development density (e.g., going from a potential one-family house lot in a single family zone to a 20 unit multifamily housing project) would not only require a zone change, but would require connection to a public sewer system or the construction of an onsite sewage treatment plant (STP). Since there are no public sewers in Orient Village and the closest being located in Greenport, increased density beyond what is permissible under existing single family residential zoning is highly unlikely if the Town does not want to rezone, grant variances or entertain a development requiring an STP.”

The potential extension described by the commenter is not part of the currently Proposed Action or DEIS. SCWA has no current plan, available funding, design, preliminary assessment, and is not considering an additional water-main extension elsewhere in Orient or the East End of the North Fork. Accordingly, an extension to the Browns Hills wellfield or Orient Point is not a reasonably foreseeable component of the Proposed Action on the present record. If SCWA later develops a specific expansion proposal, the environmental review would evaluate the then-current alignment, service area, demand, growth-inducing potential, environmental conditions, technology, and mitigation requirements. Depending on the relationship to the approved project and the significance of any new impacts, that review could require a supplemental EIS or a new EIS.

Comments H2ES-2, H2ES-4: I think one of the arguments that typically gets attention is the town didn't plan for development. It's not really the job of a water provider to plan for increased development when the water pipeline comes due. I just want to confront that with you all this evening because when that pipeline proposed for Orient, should it go through, you're going to see increased development because the incentives that brought the motivations are there.

I want the Suffolk County Water Authority to think about how it's going to plan to prevent development alongside Southold Town in that precious place that I grew up in Orient.

Response: The Proposed Action includes Phases 1 and 2, with the Orient "Village" area identified and evaluated as the Phase 2 service area in the DEIS. SCWA is not currently considering, planning, designing, or funding service beyond Orient "Village." Any future consideration or proposal to extend service farther east would require a defined alignment, service area, demand projection, funding plan, and environmental review such as a Supplemental EIS or a new EIS depending on various factors outlined in 6 NYCRR Part 617 (SEQR) before approval.

Comments WTM-5, WTM-10, WTM-15: The DEIS does not include an evaluation of expected demand based on current zoning in the Towns of Southold, Riverhead, Brookhaven, Southampton and East Hampton, and the incorporated villages within each town.

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 buildout under current zoning in each town. This analysis would help SCWA anticipate future service needs and assist municipalities in planning for local housing demand.
- *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.

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.

Response: The DEIS evaluates buildout and water demand within the identified Orient Hamlet service area under current zoning, both with and without public water service. That analysis, provided in Appendix D and summarized in Section 3.1.2 of the DEIS, concluded that extending safe, clean, reliable water with sufficient pressure could allow up to five additional single-family

homes in the service area. A multi-town buildout analysis under current zoning for the Towns of Southold, Riverhead, Brookhaven, Southampton, and East Hampton and their incorporated villages is outside the project scope and the approved Final Scope for the DEIS. The source-area analysis instead evaluates the additional pumping assigned to the existing permitted wells and the resulting groundwater and stream-baseflow effects associated with the projected project demand. Regional land-use changes or separate infrastructure projects that advance beyond general planning would remain subject to their own environmental review and, where reasonably foreseeable and relevant to this project, consideration in the cumulative-impact analysis. SCWA'S engineering report provided an estimate of anticipated demand over a fifty-year planning horizon.

The proposed source wells have additional permitted capacity to serve the proposed project area. Based on the analyses presented in the DEIS and FEIS, use of that capacity is not anticipated to result in a significant adverse impact.

The approved Riverside redevelopment and wastewater treatment plant are separate projects that were previously examined and are not re-evaluated in this DEIS.

Comment WCY-3: Calculations of projected growth in new services for the 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.

Response: SCWA determines trends based on a review of the past five years of data. The Project is designed to address existing supply constraints while allowing areas with documented water quality issues to access to public water. Even if pandemic-induced growth could be teased out of the data, the existing demand outstrips supply.

2.16 Alternatives

Comment H3MF-1, H3MF-2: I'm here because the local newspaper keeps us informed on things and they had a great article about an interview with SCWA and it mentioned a number of different things, including that the Sound Avenue stopped because you listen to the people. You know, I'd like to call BS on that to start. All right? You stopped it because it wasn't a sound plan to begin with. It was the wrong direction that wasn't going to provide adequate pressure. So for whatever the reason, all of your experts couldn't figure it out.

At the scoping session, I heard [a Riverhead employee] say it, so you guys just didn't want to listen. Now, maybe that's because you get paid a lot of money. You know, I took a look at your salary in 2024, it was about three hundred grand. You have six staff people, that rounded it off to about a million dollars.

You charge more money for your customers than Riverhead charges; Riverhead charges less to do it. So I guess, you know, sometimes things have to make sense to me. I'm a high school graduate, but I've got a pretty decent sense of what's right and what's wrong. And I need somebody to explain to me how you have a monopoly on expanding water to the East End of Long Island when Riverhead, who can do the job for 25 percent of what you are, sits ready, willing and able to do that. How do you come in and get this contract? How do you end up with the monopoly? How does Suffolk County Water determine the prices and where you're going to send your pipes? Enough is enough. The people have had enough.

Response: The DEIS evaluates the Sound Avenue Proposed Action and the Main Road Preferred Alternative. The public presentation explained why Main Road was identified as preferred, including its shorter length, avoidance of the narrower Sound Avenue corridor, improved hydraulic performance, and elimination of the potential need for an additional booster station. This preliminary preference does not constitute final route selection. SCWA will select a route only after completing the SEQRA review, considering the alternatives and the full environmental record, and adopting a Findings Statement. Appendix B also evaluates purchasing water through an interconnection with the Riverhead Water District and explains that Riverhead experiences

peak demand during the same periods when Southold requires supplemental supply, limiting Riverhead's reliability as a peak source. The project does not propose customer connections within the Riverhead Water District service area.

Comment WJS-5: 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 Route 25 Route and Route 25/Route 105 Booster Pump Station) and its potential impacts and mitigating measures.

Response: The DEIS evaluates and compares the Proposed Action—the Sound Avenue route and Pier Avenue Booster Pump Station—and the Preferred Alternative—the NYS Route 25 alignment and Route 25/Route 105 Booster Station. For each alternative, the DEIS describes existing environmental conditions; evaluates potential environmental, engineering, operational, social, and economic effects; identifies feasible avoidance and mitigation measures; and considers comments received from the public, civic and environmental organizations, and involved and interested agencies.

The Lead Agency determined that the DEIS satisfied the project's Positive Declaration/Determination of Significance, the adopted Final Scope, and the content requirements of 6 NYCRR § 617.9(b), and therefore accepted the DEIS for public review. Both routes received detailed review because each was identified as a feasible means of meeting the Project's purpose and need in light of SCWA's objectives and capabilities. The comparative analysis provides decision-makers, agencies, and the public with a structured basis for evaluating the alternatives' relative advantages and disadvantages and determining which alternative would best achieve the Project's objectives while avoiding or minimizing adverse impacts to the maximum extent practicable.

The DEIS is not limited to comparing these two routes. It documents existing conditions through field investigations, database research, review of relevant plans and studies, and technical analyses prepared by the Project's environmental, ecological, hydrogeologic, archaeological, AND engineering, professionals. Based on this work, the DEIS evaluates potential impacts and mitigation measures and examines a reasonable range of alternatives, including the No Action Alternative and the Peconic Bay Boulevard Alternative. The alternatives analysis also considers hydraulic performance, operational reliability and resiliency, constructability, cost, water conservation, and other engineering and environmental factors relevant to the Project's objectives, as described in the DEIS, its supporting appendices, and the route-evaluation materials.

Identification of the Route 25 alignment as the Preferred Alternative does not constitute final approval or final route selection. It reflects SCWA's preliminary conclusion, based on the technical studies and environmental analysis presented in the DEIS, that the Route 25 alignment currently appears to provide the most practicable means of meeting the Project's objectives while minimizing environmental and community impacts. Before making a final decision under SEQRA, the Lead Agency will consider all substantive comments received on the DEIS, the analyses and responses presented in the FEIS, and the relative impacts, benefits, and feasible mitigation associated with each alternative. The selected route and required mitigation measures will be documented through the SEQRA Findings process after completion of that review.

2.16.1 Alternative 2: Preferred Alternative

Comment WJS-8: 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.

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.

Response: The comment is acknowledged. The potential need for a second booster station was determined as part of the assessment of hydraulic conditions and route feasibility study that was part of the planning, feasibility, and environmental review. The hydrogeologic analysis and route evaluation documented in DEIS Appendix B was undertaken as part of the evaluation of alternatives process to assess the operational feasibility and performance of the various routes under consideration and to provide additional information and analyses for the environmental review and selection of a final route. As the engineering evaluation progressed and more detailed hydraulic modeling was completed, it was determined that additional infrastructure, potentially including a second booster pump station, may be required along the Sound Avenue route to achieve SCWA's operational objectives and maintain adequate pressure and flow conditions throughout the service area or that a larger diameter pipe may be required. The identification of

this consideration during the SEQRA review process demonstrates that the alternatives analysis is functioning as intended by identifying engineering, operational, environmental, and economic factors that distinguish one alternative from another and determining and assessing potential impacts. SCWA has identified that a second booster station can be located at the intersection of Main Road and Cross River Drive (CR 105). this station can be the sole booster if the Preferred Alternative is selected or in tandem with the Pier Avenue booster, if the Sound Avenue alternative is selected.

The potential need for an additional booster station or larger diameter pipe is not the sole basis for preferring the Main Road alternative. The DEIS is part of an iterative review and refinement process; it neither selected the Preferred Alternative as the final route nor found the Sound Avenue route infeasible. Rather, the Sound Avenue route remains technically viable but may require additional infrastructure to achieve the desired service and reliability and other aspects of review has suggested that the preferred Alternative may be the better of the two. Because the location, design, and operational requirements of a second booster station would depend on final route selection and subsequent engineering, that facility remained conceptual during the DEIS stage. The DEIS identifies and compares the potential environmental impacts of reasonable alternatives; it does not provide final construction plans for every alternative under consideration.

Consistent with SEQRA, the Proposed Action, Preferred Alternative, No Action Alternative, and Peconic Bay Boulevard Alternative were evaluated to determine their relative environmental, engineering, operational, social, and economic advantages and disadvantages. The hydraulic limitations associated with the Sound Avenue route, including the potential need for additional pumping infrastructure, were among the factors considered in the comparative analysis. These findings contributed to the identification of the Route 25 corridor as the Preferred Alternative; however, no final route selection has been made. The ultimate determination regarding the selected route and associated infrastructure will be made by the Lead Agency following review of the FEIS and issuance of the SEQRA Findings Statement.

Accordingly, the hydraulic analysis and identification of potential additional infrastructure needs represent a normal and appropriate part of the alternatives evaluation process and provide information necessary for final plan selection and refinement and informed decision-making under SEQRA.

Comment WJS-13: The Riverhead Town officials (and public) were unaware of the significant 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 Route 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 Route 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 Route 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?

Response: “Section 5.0, Draft Environmental Impact Statement Organization and Content” of the DEIS outline on page 13, Section 5.2 of the approved final scope specifically requires that the following alternative be considered.

“Alternative 2: Preferred Alternative *(Alternative whereby the Riverside/Flanders to Jamesport/Laurel route (north route) is replaced by a Riverside/Flanders to Laurel (south route) beginning at Flanders Road (SR 24)/Cross Island Drive (CR 105) intersection, then north on Cross River Drive/Main Road intersection, east along Main Road (SR 25) to the intersection of Main Road (SR 25) and Franklinville Road in Laurel where it will connect to an existing SCWA main”.*

The approved Final Scope was noticed in the Environmental Notice Bulletin (ENB) and made available to the public and involved and interested agencies. It expressly identified the Main Road alignment as Alternative 2. After accepting the DEIS, SCWA conducted additional outreach regarding the public hearings, the comment process, and the Preferred Alternative. That outreach included the following measures:

- letters were sent to all adjacent land owners along the Proposed Action and Preferred Alternative routes. Notices were written in both English and Spanish.

- Notices, updates, contact information and SEQRA documents and plans were provided on the SCWA website and an interactive platform for submission of public comments was provided.
- Notices of the public hearing were published in three local or regional newspapers including:
 - *Newsday*
 - *The Suffolk Times*
 - *The Riverhead-News Review*
- Three public hearings were held — one in each of the three affected towns at the following locations:
 - SCWA's Westhampton office building in Westhampton, Town of Southampton;
 - Southold Recreation Center in Peconic, Town of Southold; and
 - Riverhead Library in Riverhead.
- SCWA and its consultants provided lengthy presentations providing substantial detail on the project at each public hearing.
- The Town of Riverhead held its own Monroe hearings to discuss the project.
- Various local and regional newspapers and area publications published follow-up articles on the project indicating that the preferred alternative that was identified in the Final Scope was currently the Preferred Action and would receive additional focus. Newspapers included:
 - *Newsday*
 - *Riverhead Review*
 - *East End Beacon*
 - *Riverhead Local*
 - *North Fork Sun*
 - *Long Island Life and Politics*
 - *South Shore Press*
- A lengthy and informative story was broadcast on WSHU 91.1 FM radio discussing the project.
- A notice of public hearings, contact information for comments, and the locations to review a paper copy and website to access the DEIS was published in the NYSDEC's Environmental Notice Bulletin.
- Notices were sent to a total of 19 identified involved and interested agencies and 6 local non-agency organizations.
- a 50-day written comment period was provided, which was later extended an additional two weeks for a total of 64 days providing over twice the required written comment period mandated by SEQRA.

- The DEIS was made available to the public on SCWA’s official website and the link to this website was provided in several publications, and hard copies were filed at the following locations to facilitate public accessibility:
 - SCWA’s Westhampton Office;
 - Southold Free Library;
 - Riverhead Public Library; and
 - Town of Riverhead Clerk’s office.

The DEIS satisfied the Final Scope and applicable SEQRA procedural requirements. Notice was provided through multiple channels, the DEIS and supporting materials were made available at several public locations and online, and the extended comment period provided substantial opportunity for agencies and the public to review and comment on the Preferred Alternative and other project alternatives. SCWA extended the DEIS comment period by fourteen days to provide additional time for interested parties to submit comments.

Finally, the FEIS responds to all substantive project-related comments concerning the Proposed Action, Preferred Alternative, Peconic Boulevard Alternative, and DEIS. After accepting the FEIS, SCWA, as designated lead Agency, will consider the full environmental record and adopt a Findings Statement and Determination of Environmental Effect. If Positive Findings are adopted the Findings Statement will identify the selected project or alternative and all required mitigation before finalizing all plans and making its final project decision.

Comment H3KC-2: In describing the switch to the Main Road plan, I see a lot of indeterminate language without timelines describing all the disruption that will result from this project. I know that you have to break a few egg shells to make an omelet, but can there please be another way to do this? You’re going to wreck a community.

Response: Construction would occur primarily within previously disturbed road rights-of-way containing pavement, drainage improvements, and existing water, gas, electric, telecommunications, and other utility infrastructure. Temporary and localized traffic, access, noise, and community disruptions would remain unavoidable, but SCWA would minimize them through phased construction, advance notice of active work areas and anticipated schedules, property-access coordination, traffic controls, and restoration of disturbed areas. Final schedules would be refined through design, permitting, agency consultation, and contractor planning and communication before work begins in each area. Once completed, the project would augment the supply in SCWA Southold Low Pressure Zone and implement the project’s objectives.

Comments WRD-1, WRD-2, WRD-3: These comments identify the Preferred Alternative as the best route for the main installation and provides the bases for this conclusion. 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.

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.

Response: Comment acknowledged.

2.16.2 Alternative 3: Peconic Boulevard

Comment WJS-44: 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 a 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 Route 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.

Response: The North Fork has three potentially viable east-west roadway corridors, all of which are evaluated in the DEIS. Peconic Bay Boulevard is more residential in character than the roadways used by the Proposed Action and Preferred Alternative. The Peconic Bay Boulevard route appeared in the original Draft Scope. However, Item 9a of the Town of Riverhead

representative's June 10, 2025 scoping recommendations, the Town had reviewed that route and found it to be "impactful and unreasonable,"

"The DEIS Draft Scope listed only two [alternatives]:

- a. (1), the No Build and (2), an alternate route through Peconic Bay Boulevard. The second alternative has been previously reviewed by representatives of the Town of Riverhead and determined to be impactable and unreasonable. SEQRA requires alternatives to be reasonable and feasible. The second alternative is restricted by significant environmental restraints due to the proposed site location for the routing of the watermain and is not a true alternative pursuant to SEQRA (it is essentially a No-Build)."

That earlier statement differs from the position expressed in the present comment and creates uncertainty regarding the Town's current position on this alternative:

Based in part on the Town of Riverhead's assessment and SCWA's preliminary findings, SCWA was able to identify another potential route, the Preferred Alternative, and provided a detailed analysis of the route in the DEIS. The DEIS nevertheless discussed the Peconic Bay Boulevard route alternative since the actual requirement under SEQRA is the review of "alternatives to the action that are feasible, considering the objectives and capabilities of the project sponsor," (emphasis added) (6 NYCRR § 617.9(b)(5)(v), not the Town of Riverhead. Including the route allowed the Lead Agency to further examine its feasibility, potential impacts, advantages, and disadvantages and to determine whether it remained a reasonable course of action.

Based on the DEIS and SCWA's Hydrogeologic Analysis and Route Feasibility Report, the Peconic Bay Boulevard route performs well hydraulically but presents significant environmental and construction challenges because of its proximity to wetlands and the required water crossings. By comparison, the Proposed Action and Preferred Alternative follow roadways farther from the coastline that are generally wider, straighter, and bordered by wider shoulders, providing favorable conditions for construction and reducing potential environmental and traffic-related impacts and constraints.

SCWA acknowledges the comment that there is a high voltage power line that bisects many privately owned properties and traverses the Town of Riverhead in a generally east-west direction. The referenced electric utility easement is privately owned and is not part of a public right-of-way. SCWA neither owns the easement nor currently holds property rights authorizing its use for the proposed water main. Various easements would have to be attained and access would be more difficult due to the complexities of a water main occupying the same general area as high voltage buried or overhead transmission lines. SCWA's previous experience with this issue has

shown it to be extremely difficult to obtain these easements due to the stringent requirements of the electric utility for spacing, grounding, distance from buried counterpoises and maintenance. In addition, the power line bisects private residential, agricultural, and commercial properties. If SCWA needed to access the main, it would be required to enter onto the private property. Conversely, access to a main installed along a publicly-owned travelled roadway is a common occurrence that all utility providers perform on a daily basis. Installation of a main under the existing power lines is not a reasonable alternative.

SCWA has also evaluated a broader range of alternatives or possible supplemental measures, both individually and collectively. These include the requisite No Action Alternative; water conservation; additional storage facilities; point-of-use and point-of-entry treatment; purchase of water from the Riverhead Water District; continued reliance on existing wells in Southold and eastern Riverhead with capacities of 100 to 500 gallons per minute; and desalination.

2.16.3 Change from Proposed Action to Preferred Alternative

Comments WBB-1, WBB-2, H3BB-1, H3BB-2, H3BB-3, H3BB-4: 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.”

The SEQRA record is less than sound. COMMENTORS 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.

The Main Road route is now the preferred course of 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.

Response: SEQRA requires that every DEIS evaluate a reasonable range of alternatives. Consistent with the Final Scope accepted on November 19, 2025, the DEIS evaluates the Proposed Action, the Preferred Alternative, and the required No Action Alternative. The previously discussed

Peconic Boulevard Alternative was also briefly discussed since it had been previously considered and found not to be acceptable by the Town of Riverhead and SCWA.

The alternatives analysis provides a framework for identifying, describing, comparing, and assessing other practicable courses of action that may avoid or further minimize adverse impacts, offer additional benefits, while satisfying the Project Sponsor's objectives and needs. The DEIS evaluates existing conditions and environmental settings along both the Proposed Action and Preferred Alternative Phase 1 corridors; compares the nature, magnitude, and duration of potential impacts; identifies available avoidance and mitigation measures; and evaluates the relative advantages and disadvantages of the Proposed Action and alternatives.

The alternatives were examined at a level of detail sufficient to support comparison by SCWA, as Lead Agency, and by involved and interested agencies and the general public. Based on the technical studies, plans, figures, tables, maps, available databases, input received from others, and environmental analyses presented in the DEIS, SCWA has preliminarily identified the Preferred Alternative (Main Road) route as the preferred course of action because it currently appears to provide the most practicable means of meeting the Project's objectives while avoiding or minimizing adverse impacts. This preliminary preference does not constitute final route selection. SCWA will make its final determination after considering the comments and responses in the FEIS, the relative impacts and benefits of the alternatives, and the feasibility and effectiveness of identified mitigation measures.

Comments WBB-4, H3BB-6: 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.

Response: SCWA is the project sponsor and duly-appointed Lead Agency for the Proposed Action. Based on its evaluation of the DEIS and reasonably anticipated impacts, Town input, and the project sponsor's objectives and project feasibility, the Phase 1 Main Road route is the preferred route to Southold.

2.16.4 Alternatives, General

Comments WJS-47, WJS-48: 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."

“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 Station. Additionally, the Route 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.

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.

Response: SEQRA requires the Lead Agency to evaluate a reasonable range of feasible alternatives that could achieve the project sponsor's objectives while avoiding or minimizing significant adverse environmental impacts to the maximum extent practicable. Although the Proposed Action may receive greater attention during the initial stages of environmental review, the alternatives analysis is an integral part of the review and may establish that another feasible alternative better satisfies the Project's objectives while reducing environmental impacts.

Phases 1 and 2 of the Proposed Action total approximately 14.05 miles, while Phases 1 and 2 of the Preferred Alternative total approximately 12.99 miles. Main Road generally provides wider rights-of-way and shoulders, which may offer additional space for construction and improve worker and public safety. Main Road also contains numerous businesses and carries substantial traffic. However, Sound Avenue similarly experiences considerable traffic associated with tourism, wineries, farm stands, agricultural operations, and some businesses, but generally has a narrower roadway and cleared right-of-way, few or no sidewalks, regular farm-vehicle traffic, and is designation as a State Scenic Byway maintained by the Town. Both routes therefore present distinct advantages, constraints, and potential impacts. Based on the comparative analysis completed to date, SCWA has preliminarily identified the Preferred Alternative as its favored route and disclosed that preliminary preference so that the public and agencies could provide informed comments, assessments, and recommendations before a final decision is made.

During its 75-year history, SCWA has installed more than 6,000 miles of water main and constructed numerous wells, booster stations, and drinking-water treatment facilities under varied field conditions. In recent years, it has installed an average of approximately 20 miles of water main annually, compared with the approximately 12.99-mile combined length of Phases 1 and 2 of the Preferred Alternative, which is expected to require 12 to 18 months if installed consecutively. SCWA serves approximately 1.2 million customers and has over 600 employees with experience in constructing, operating, and managing public water-supply facilities. Its annual Drinking Water Quality Reports, strategic plans, and applicable standards and regulations further inform system planning and oversight. This institutional and technical experience would support final design, construction planning, implementation, mitigation, and project management.

Section 617.1(c) of 6 NYCRR Part 617 states that the basic purpose of SEQRA is to incorporate consideration of environmental factors into governmental planning, review, and decision-making processes at the earliest possible time. Consistent with that purpose, SCWA's identification of a Preferred Alternative reflects a preliminary conclusion based on the comparative analysis presented in the DEIS; it is not the final route selection. The Lead Agency will make its final determination after completing and accepting the FEIS, considering substantive public and agency

comments, and adopting a SEQRA Findings Statement that identifies the selected alternative and required mitigation measures. If Positive Findings or a determination of no significant adverse effect are adopted, SCWA would then finalize the project plans, as necessary, consistent with the completed SEQRA review and applicable final design and Findings Statement and approval requirements.

Comments WAK-2, WAK-3, WAK-4: 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) of the DEIS 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 pages 5-1–5-5).
- Appendix B addresses conservation in Section X.E (pages 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” (page 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.

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.

Response: SCWA recognizes conservation as an important component of long-term water-supply planning and has incorporated conservation measures into its programs and strategic planning. The DEIS and the Hydrogeologic Analysis and Route Feasibility Report identify measures including locally adopted and enforced odd-even watering requirements; tiered rates that increase with consumption; pressure-reducing valves for irrigation systems; weather-responsive or remotely controlled irrigation controllers; and, where legally permissible and environmentally appropriate, private wells for non-potable irrigation.

These measures were not evaluated as a stand-alone alternative because their results depend on customer participation, local adoption and enforcement, irrigation behavior, and other factors, which may limit the ability to predict a defined volume, pressure, or emergency reserve at a particular time. Conservation can reduce discretionary outdoor use and peak demand. Based on the analyses presented, however, it is not anticipated by itself to provide routinely monitored potable water, replace chloride-affected wells, or meet the project's stated fire-flow, pressure, reliability, resiliency, emergency, and long-term supply objectives. Conservation and storage may therefore complement the proposed water-main extension, while a reliable source would still be needed to refill storage and meet projected peak conditions.

SCWA's Strategic Plan 2030 formalizes its conservation commitment through Goal No. 6, "Increase environmental conservation and outreach," and Goal No. 7, "Implement the 2023 Multi-Phase Water Conservation Plan." Supporting strategies include expanding education programs; broadcasting public-service announcements for new and current homeowners; providing field employees with concise conservation materials for customers; promoting the "Our Water Our Lives" campaign through social media; installing smart-irrigation systems at SCWA facilities; and using native, low-irrigation landscaping at the SCWA Education Center. SCWA also maintains a water-conservation web portal that provides customers with conservation guidance and a forum for submitting comments.²

SCWA will continue to review available usage data, program participation, seasonal demand trends, area growth, and the effects of locally adopted irrigation requirements, including Southold's 2025 irrigation law, as sufficient post-implementation data become available. SCWA will also continue to coordinate with affected municipalities regarding enforceable irrigation and land-use measures and refine conservation programs where feasible. This evaluation may inform future demand-management and operational decisions. Based on the current record, conservation and storage by themselves are not anticipated to satisfy the full range of identified project needs.

² <https://www.scwa.com/suffolk-county-water-authority-launches-new-conservation-web-portal/>

Comment H2JK-2: Some basic information that should have been included in the DEIS is how many businesses in Riverhead are going to have their access restricted, even if it's only for a day. And what are the economic impacts of that? A simple count of driveways, a pretty basic component of this type of construction, should have been in the DEIS.

Response: The DEIS identifies measures to maintain access during construction. Where an open trench temporarily affects a driveway, SCWA and its contractors may backfill an approximately 20-foot section or place a portable steel ramp or metal plates over the trench to permit vehicle access and egress. Construction crews would install and remove these temporary crossings using onsite equipment and standard traffic-control practices. Open-cut installation generally advances approximately 300 to 400 feet per day and may exceed 600 feet per day along long grassed-shoulder segments, so a trench would remain adjacent to an individual residential or commercial driveway only briefly. Many businesses and shopping centers, particularly corner and flag lots, also have more than one point of access. Flaggers would assist traffic where needed. Accordingly, impacts to individual driveways would be temporary and would end once work progresses beyond the affected driveway and property.

Finally, the NYSDEC 2020 SEQRA Handbook, Fourth Edition, distinguishes environmental effects from purely competitive or speculative economic losses. The following guidance appears under Question 9 on page 114:

Question: "Are there economic or social factors which are inappropriate for inclusion in an EIS?"

Answer: "Purely economic arguments have been disallowed by the courts as a basis for agency conclusions when concluding a SEQRA review by developing Findings. Therefore, potential effects that a proposed project may have in drawing customers and profits away from established enterprises (commonly known as "competitive impacts"), a possible reduction of property values in a community, or a potential economic disadvantage caused by competition or speculative economic loss, are not environmental factors."

Comment H2JK-3: I noticed on the slide that went up, the Sound Avenue route wasn't even mentioned as one of the project alternatives, yet the entire DEIS is predicated on the original EIS for the Sound Avenue project. And the differences between that route and the current route are dealt with in, I'd say, not more than 20 percent of the total DEIS.

Response: The DEIS evaluates the Proposed Action and Preferred Alternative to support comparative review and decision-making. Both routes were presented during the public hearings and through environmental review documents. Portions of the analysis apply to both alternatives

because the first approximately 2.1 miles of Phase 1 are common to both routes, Phase 2 is identical, and the alternatives involve many of the same construction methods, soil conditions, erosion and sediment controls, wetland-protection measures, permit requirements, directional-drilling methods, and mitigation measures. The DEIS therefore uses shared analyses where conditions are comparable and provides separate discussion where route-specific conditions, impacts, or mitigation differ.

Comment H3BS-4: The idea of the Riverhead water department supplying some water for the North Fork is good; I don't know if that's included as an alternative in the Environmental Impact Statement.

Response: The potential use of the Riverhead Water District to meet area needs was evaluated on page 68 of SCWA's June 2026 Hydrogeologic Analysis and Route Feasibility Study, provided in Appendix B of the DEIS. The study states:

The Suffolk County Water Authority has an existing, boosted interconnection with the Riverhead Water District at Peconic Bay Boulevard. Another interconnection could be made on Sound Avenue near the town of Riverhead/Southold line. In the case of Riverhead, however, having a viable interconnection would require Riverhead to supply water during peak periods when it is needed by Suffolk County Water Authority. Unfortunately, the peak periods are when the Riverhead Water District experiences its own peak and so relying on it would not be a prudent approach. In addition, for an interconnection to be viable, it would need to provide the peak flows and volumes that are projected to occur throughout the projection period. This would require the Riverhead Water District to supply close to 6,000 gallons per minute at peak through the interconnections. The Riverhead Water District does not have this capacity.

Comment H3BS-6: One last example. The project that is being processed by the Southold Town Planning Board for site plan review, Rejuvenate Farms. It's a start-up farm on property that hasn't been used in 50 years and their plans include connecting to Suffolk County Water Authority for the sole source of water for their farm.

The Suffolk County Water Authority has not appeared in that site plan review, they haven't said anything, so the Planning Board hasn't asked, hasn't contacted the Water Authority. Many of the citizens have contacted the Water Authority and the Water Authority is waiting for the Town to ask it. The Town has asked the applicant, does Suffolk County Water Authority have enough water to supply the farm? And he assures us, yes, yes, yes. Well, of course he would say that, but we have no facts, no proof. And this process is not unique. This is going on every day, every single development, and there's so many things that Suffolk County Water Authority

could do to make a positive difference. In my humble opinion, this pipeline is not one of them, but if you're going to do it, I trust that you will take these comments that are provided tonight and respond to them in meaningful ways.

Response: The comments appear to concern a separate Southold Town site-plan application. Typically, when an application for site plan approval is submitted and the plan includes connection to one of SCWA's systems, a service letter is submitted to the Water Authority. Any request for SCWA service would be reviewed through the applicable connection and service-planning process, including evaluation of system capacity and applicable approvals. The commenter's concern is acknowledged, but the site-plan application is outside the scope of this project-specific environmental analysis.

Comment H2CG-1: In the evaluation of alternatives and looking at wells, possible siting of other wells within the Town of Southold, the actual siting study discounted preserved farmland from a potential well site because -- so there were numerous criteria that were used. And I'm not sure that -- I understand why you did it, but I'm not sure, working with the Town, working with the DEC, which is technically the manager of our aquifer, that we couldn't come to an agreement to look at preserved farmland for potential new well sites.

And as we wait for the New York State DEC's report showing the confining unit for the North Fork Aquifer, there may be some good water beneath preserved farmland. Now, I know that the site plan identified two potential sites, one has been in reserve, one has been put into use, but there may be other sites out there.

Response: Appendix B of the DEIS evaluates continued use of existing North Fork wells and development of additional Southold well capacity. It concludes that the North Fork's limited freshwater aquifer, water-quality and chloride constraints, and well-capacity limitations make new local production wells less reliable than using existing permitted capacity in the South Shore Low Pressure Zone. Preserved farmland was not identified as an available well site because its protected status may restrict conversion to water-supply infrastructure, and historical fertilizer, pesticide, and herbicide use may present source-water concerns. Any specific preserved-farmland site would require separate legal, hydrogeologic, and water-quality review and is not currently under consideration. See also **Section 2.6.3** for the comment and response to **Comment WCY-6** which discussing restrictions on using agricultural land for public well sites.

2.17 SEQRA Process and Procedures

2.17.1 Permits and Approvals Required; Determination of Lead Agency, Involved Agencies, and Interested Agencies

Comments H1GD-1, H1GD-2, H1GD-3: The Towns of Riverhead, Southold, and Southampton were all classified as interested agencies rather than involved agencies under SEQRA. What ongoing consultation and coordination process will the Water Authority offer to the towns beyond the standard that we've seen so far?

As I have mentioned to [SCWA'S CEO] in our phone call, I was taken aback, and I know the Town Supervisors were taken aback, when we learned about the re-route in the news media, in a press release; and to me, that really doesn't reflect a collaborative relationship. The need for this collaborative relationship, for me, goes back to 2022 when I was on the Town Board and we had that original discussion.

The DEIS lists the Town of Southampton as an interested agency only for notification of the directional drill under the Peconic River within 150 feet of the town wetlands at Flanders. Why is the Water Authority treating Southampton's wetlands jurisdiction as a notice item only rather than obtaining the town's wetlands permit? We'd like to know what the Water Authority plans to do in working with the Town Trustees here.

I would also note that Riverhead Town does also have wetlands. Of particular concern along the route is the Mill Creek Restoration that they just worked with Peconic Estuary Partnership, New York State DEC, and invested \$2.2 million to restore wetlands right on the Main Road there.

This same pattern also applies in Southold in Phase 2 in Orient where the DEIS lists the Town as an interested agency for notification only within the wetlands. And it's not just for the directional drilling; it's also for the staging areas that are in any work areas that'll be done there. For the record, it is worth noting, based on my experience in Southold Town, I know the DEC will have their requirements for the wetlands permit here. Sometimes there are differences between the Town's requirements and the DEC's requirements and the Town feels like it's really important to engage with the town as a good partner here.

Response: See also **Section 2.6, "Wetlands and Surface Waters."** The DEIS review process provided several opportunities for public and agency input regarding potential wetland impacts, available mitigation, and the anticipated effectiveness of mitigations identified. This included three public hearings and a 64-day written comment period. The applicability of local permit requirements is the subject of pending litigation in Suffolk County Supreme Court; however, that

dispute does not preclude continued consultation with the Towns and other agencies regarding wetland boundaries, work limits, construction controls, and recommended mitigation. The DEIS identified numerous measures identified by environmental professionals intended to avoid or minimize potential wetland impacts to the maximum extent practicable, including measures that extend beyond the minimum conditions of NYSDEC's General Wetlands Permit, as summarized below.

Proposed Mitigation Measures to Protect Wetlands Regulatory Compliance and Work Limits

1. Comply with applicable NYSDEC freshwater and tidal wetland permits, including the project's NYSDEC General Wetlands Permit.
2. Implement the construction mitigation measures identified in Section 4.1.3 of the DEIS.
3. Comply with applicable SPDES General Permit and project-specific SWPPP requirements.
4. Limit water-main installation to existing pavement or generally within five feet of pavement where work is near wetlands.
5. Prohibit unauthorized excavation, trenching, grading, filling, vegetation removal, soil exposure, or other disturbance within regulated wetlands.
6. Stage and secure equipment and materials outside regulated wetland areas and maintain required wetland setbacks.
7. Confirm wetland boundaries and jurisdiction through agency coordination and field delineation where necessary.

Erosion and Sediment Controls

1. Identify work areas near wetlands and surface waters before construction begins.
2. Install silt fencing or silt screens before trenching or excavation within 100 feet of wetlands or surface waters.
3. Install staked hay bales or equivalent secondary containment downgradient of directional-drilling pits.
4. Use fencing with openings no greater than No. 20 and recess it at least six inches into the ground to prevent underwash.
5. Install drainage-inlet protection where sediment could enter stormwater infrastructure.
6. Protect excavated-soil stockpiles from erosion, runoff, and wind dispersal.
7. Maintain erosion and sediment controls until disturbed areas are repaved or fully revegetated.
8. Remove accumulated sediment from controls and either reuse it onsite or dispose of it at an approved upland location.
9. Avoid trenching during rainstorms.
10. Promptly backfill trenches after pipe installation.
11. Prevent sediment-laden runoff from entering wetlands, surface waters, storm drains, or adjacent properties.

12. Remove construction debris and excess materials from wetland-adjacent areas and prohibit disposal within wetlands or regulated buffers.

Soil Stabilization and Restoration

1. Immediately stabilize disturbed soils following construction.
2. Backfill, compact, regrade, reseed, and mulch disturbed roadway shoulders and other unpaved areas.
3. Restore final grades and drainage patterns to preconstruction conditions, as practicable.
4. Use native seed mixes to stabilize disturbed areas near wetlands and surface waters.
5. Use straw or hay mulch, jute matting, winter rye, or similar temporary stabilization where areas will remain inactive for more than 48 hours or seasonal planting is impractical.
6. Moderate excessively steep restored slopes where appropriate to reduce erosion potential.

Horizontal Directional Drilling

1. Use horizontal directional drilling at major wetland, tidal-inlet, river, creek, and sensitive watercourse crossings to avoid surface disturbance.
2. Maintain adequate drilling depth beneath wetland substrates and waterbody bottoms; the Peconic River crossing is proposed at approximately 30 feet below the river bottom.
3. Locate drill entrance and exit pits away from riverbanks and riverside wetlands.
4. Size bentonite recovery pools to provide at least 110 percent of the anticipated drilling-fluid volume.
5. Surround drill pits and bentonite-recovery pools with silt fencing.
6. Provide a pump truck onsite to remove excess drilling fluid and sediment before recovery pits overflow.
7. Remove drilling slurry from recovery pools before the pools fill.
8. Dispose of excess bentonite and drilling slurry at an approved facility.
9. Obtain NYSDEC approval where offsite upland disposal occurs outside tidal-wetland jurisdiction.
10. Backfill drill pits and recovery pools with clean native soil or compatible clean sand.
11. Reseed and stabilize disturbed drill-pit areas with native vegetation.

Drilling-Fluid Release Response

1. Stop drilling immediately if a drilling-fluid frac-out or inadvertent return occurs.
2. Immediately notify the project's natural-resources supervisor.
3. Contain and manage drilling-fluid releases in accordance with NYSDEC-approved procedures, permit conditions, and established best management practices.

Dewatering and Water-Quality Protection

1. Follow permit-required dewatering procedures.
2. Limit trench-pump capacity to approximately 40 gallons per minute where dewatering is necessary.
3. Do not discharge dewatering water directly to storm drains.

4. Discharge through geotextile filter bags located at least 50 feet from wetlands, streams, and other surface waters.
5. Use splash pads where dewatering water is discharged to unpaved areas.
6. Recharge extracted freshwater through nearby drainage facilities or suitable pervious ground.
7. Prevent suspended sediment and turbid water from reaching wetlands and surface waters.
8. Prevent fuels, solvents, lubricants, paints, epoxy coatings, concrete, leachate, and other contaminants from entering wetlands or waterbodies.

Equipment, Fuel, and Spill Prevention

1. Maintain construction vehicles and equipment in good working condition.
2. Periodically inspect equipment for fuel, oil, hydraulic-fluid, or other leaks.
3. Store equipment and machinery more than 100 feet landward of regulated wetlands or waterbodies at the end of each workday.
4. Locate fuel and chemical storage tanks more than 100 feet from wetlands and waterbodies.
5. Where the 100-foot separation cannot be maintained, use a complete containment system approved by NYSDEC.

Monitoring and Operational Contingencies

1. Install and/or inspect erosion and sediment controls daily to ensure that they are fully in place and functional.
2. Maintain erosion and sediment controls through final stabilization.
3. Use established response procedures in the unlikely event of an inadvertent drilling-fluid releases.
4. If groundwater withdrawals adversely affect wetlands, adjust pumping rates, use alternative South Shore Low wells, or temporarily discontinue selected supply wells.

Location-Specific Avoidance Measures

1. **Peconic River:** Directionally drill adjacent to the east side of the CR-105 bridge, with entrance and exit pits set back from riverbanks and riverside wetlands.
2. **Dam Pond–Orient Harbor/Main Road causeway:** Use directional drilling and apply the wetland, erosion-control, dewatering, and construction measures identified in Sections 2.1, 2.2, and 4.1 of the DEIS.
3. **Other wetland and tidal-channel crossings:** Use directional drilling where identified to avoid direct disturbance.
4. **Preferred Alternative:** Apply the same wetland, surface-water, erosion, sedimentation, trenching, drilling, SWPPP, and construction related mitigation measures as the Proposed Action.
5. **Sawmill Creek:** Install the main within the existing Cross River Drive shoulder or roadbed rather than disturbing the creek bed.

The document also relies on broader avoidance of wetlands through use of paved roads, previously disturbed shoulders, narrow work areas, existing roadway crossings, upland wetlands-free booster-station sites, and alignments designed outside mapped wetland boundaries.

The wetland mitigation measures identified in the DEIS are based on preliminary in-field site inspections, and decades of applying for wetlands permits, preparing Environmental Impact Statements, reviewing site plans for agencies or assisting clients in how to reduce impacts by experienced and trained professionals in the field. In addition, the DEIS scoping and DEIS process is designed to provide an opportunity for Town agencies and Trustees to recommend any specific mitigative measures that were not included or to discuss why any of the specific mitigation measures identified would not sufficiently reduce impacts.

Comment WJS-3: 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.

Response: The comment is acknowledged. The prior purchase of the booster station property was classified as a Type II Action under SEQRA; that classification applied to the acquisition of the property rather than construction or operation of the booster station. Construction and use of the booster station are components of the Proposed Action and are evaluated in the DEIS together with the remainder of the project. The DEIS describes existing site conditions, evaluates potential environmental impacts, identifies avoidance and mitigation measures, and considers reasonable alternatives consistent with the Final Scope. On that basis, SCWA’s position is that the booster station has been included in, rather than segmented from, the SEQRA review. The notation of zoning compliance as “N/A” in Appendix J reflects SCWA’s position regarding the applicability of local zoning approvals; it does not remove the booster station from the environmental review or limit evaluation of its potential impacts.

Comment H2JK-1: I just want to read something that your Chairman, wrote in an editorial published in the Riverhead paper four days ago; “The environmental review must conclude before a final route can be established.” Well, that seems to run contrary to the entire DEIS process.

Response: The Chairman’s statement is consistent with the SEQRA process and does not indicate that the DEIS review is procedurally deficient. Under 6 NYCRR § 617.3(a), an involved agency may not undertake, fund, or approve an action until it has complied with SEQRA. This process includes evaluating the proposed action and reasonable alternatives so that the lead agency and the

public can compare their potential environmental impacts, mitigation measures, and ability to meet the project's objectives.

Identification of a Proposed Action or Preferred Alternative in the DEIS does not constitute final route approval. Rather, these alternatives are presented to support informed agency and public review. As explained in the *SEQRA Handbook*, alternatives analysis enables the lead agency to determine whether a reasonable and feasible alternative could avoid or reduce adverse environmental impacts while generally satisfying the project sponsor's goals.

The final route will be selected only after SCWA has considered substantive public and agency comments, prepared and accepted the FEIS, and adopted a written SEQRA Findings Statement. The Findings Statement may approve the proposed action, select an evaluated alternative, or require practicable mitigation measures. It must certify that, consistent with relevant social, economic, and other essential considerations, the selected action avoids or minimizes adverse environmental impacts to the maximum extent practicable.

Accordingly, the Chairman's statement reflects SCWA's position that the environmental review must be completed before a final route determination is made. The DEIS alternatives analysis is part of that process and does not identify the route ultimately selected.

Comments H2JK-4, H2JK-5, H2JK-6, WRD-8: Regarding Phase 2 of the project. The idea that you're including Phase 2 because of a segmentation issue is just unsustainable. You've admitted today you have no plans to build it. It's like any water line that you might plan to construct in the future would also be considered segmentation. The mere fact that it's connected to the project in Phase 1 is not a basis for calling Phase 2 part of this project.

You don't know -- you hadn't indicated a timeline for when Phase 2 might be constructed. Is it five years, three years, 10 years in the future? And can you honestly say the environmental impacts five years from now, along the Phase 2 route, would be the same as they are today? I don't think you can, and typically given the cumulative impacts and the rate of development on the North Fork. Traffic is going to change, economic conditions are going to change, water levels are going to change, as somebody mentioned here tonight.

So you really need to be considering whether Phase 2, as much as it might be needed in the future, should be considered as part of this DEIS. All you're doing is setting up a situation where you can avoid going through an environmental review process should you ever choose to build Phase 2, because you can say, Oh, we did that five years ago.

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 happen.

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.

Response: The action evaluated in the DEIS and FEIS includes both Phase 1 and Phase 2 because they are components of the same proposed water-main extension. The two phases include both transmission and delivery to an identified service area and collectively affect project need, design, operations, environmental impacts, need and location for a booster station, and mitigation. Including Phase 2 in the current review does not constitute approval to construct it on a specific schedule or eliminate SCWA’s obligation to evaluate later changes or conditions. If Phase 2 is advanced after the SEQRA Findings Statement and the design, timing, environmental setting, or other relevant circumstances have materially changed, SCWA will determine, based on the record then available, whether the existing EIS remains adequate or whether a supplemental EIS is required under 6 NYCRR § 617.9(a)(7) of SEQRA. That provision authorizes supplemental review for potential significant adverse environmental impacts that were not addressed or were inadequately addressed because of project changes, newly discovered information, or changed circumstances, as indicated below:

“Supplemental EISs.

- (i) The lead agency may require a supplemental EIS, limited to the specific significant adverse environmental impacts not addressed or inadequately addressed in the EIS that arise from:
 - (a) changes proposed for the project;
 - (b) newly discovered information; or

- (c) a change in circumstances related to the project.
- (ii) The decision to require preparation of a supplemental EIS, in the case of newly discovered information, must be based upon the following criteria:
 - (a) the importance and relevance of the information; and
 - (b) the present state of the information in the EIS.
- (iii) 617.9 If a supplement is required, it will be subject to the full procedural requirements of section 617.9 (a) of this Part except that scoping is not required.”

Comment H2DR-1: I’m sorry, guys, it sounds like it’s a done deal. It seems like you did part of the work and you’ve already made your decision because you need the water because, hey, we’ve got to water our lawns, don’t we? We’ve got to water those sod lawns and those exotic plants.

Response: The project is not a “done deal” until the SEQRA process is completed, the Findings Statement if filed, positive findings are adopted, and plans are finalized in accordance with the Findings Statement and final plans are approved.

Comment H1GD-5: The Suffolk County Water Authority is seeking road opening permits from Suffolk County Department of Public Works and in coordination with New York State DOT as an involved agency yet treats the Town’s wetlands jurisdiction in the same project as a notification only. Why is the Water Authority willing to seek road opening permits in those jurisdictions but not in the town jurisdiction?

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead’s Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comment H1GD-6: The DEIS lists the Group for the East End, the Orient Association, Peconic Estuary Partnership and other civic groups as local non-agency parties of interest with no permits or approvals required. What mechanism will the Water Authority use to incorporate their input? I know the Peconic Estuary Partnership, for instance, missed the deadline in the first scoping session and some of the comments that they submitted were ignored.

Response: The comment is acknowledged. SCWA has reviewed the verbal and written comments received through the public and agency outreach process, including comments from local organizations, civic groups, involved and interested agencies, landowners, and members of the

public. Substantive comments timely submitted during the formal Scoping and DEIS comment periods form part of the administrative record and are addressed in the FEIS. Relevant information received outside a formal submission period may also be considered where practicable, but SEQRA does not require SCWA to reopen a completed scoping process or extend an established comment deadline. Organizations identified as local non-agency parties of interest are not permit-issuing or approval agencies because they have no discretionary approval authority over the project; however, they receive notice and may provide substantive information regarding project impacts, alternatives, and mitigation based on their local knowledge and expertise and interest in ensuring a high-quality low-impact project.

Mechanisms for providing input include public scoping, written submissions during the DEIS comment period, testimony at public hearings, correspondence submitted by mail or email, comments submitted through SCWA's project website, and direct consultation when an organization raises a specific technical issue or proposes mitigation. As detailed in the DEIS and this section of the FEIS, SCWA issued notice, made the DEIS and supporting materials available for review, held public hearings, and extended the written comment period. Substantive comments received during that period have been summarized, consolidated where appropriate, and addressed in the FEIS. Where comments identify relevant information, a potential impact, or practicable mitigation, SCWA considers that input in the environmental analysis and, where warranted, in final design, permitting, construction planning, or mitigation requirements. SCWA will continue to consider relevant input from local organizations and civic groups as the project advances.

Comment WEH-1: Pursuant to 6 NYCRR 617.12(b)(1), the Town of Riverhead requests a copy of the DEIS and all attachments and appendices for filing with the Town Clerk to facilitate review by Town officials, Town staff, residents, and other interested members of the public. The Town also requests copies of the SEQRA Positive Declaration, Notice of Completion of EIS, proof of filing of SEQRA notices and documents with the chief executive officer of the political subdivision where the action is principally located, the Notice of Hearing for the North Fork Transmission Line, the Environmental Notice Bulletin posting, and proof that all related publication requirements under 6 NYCRR 617.12(c) have been satisfied. The Town further requests that SCWA publish and post on its website the locations where these documents may be accessed and reviewed, including Town Hall, Office of the Town Clerk, 4 West Main Street, Riverhead, NY, Monday through Friday, 8:30 a.m. to 4:30 p.m., and the Riverhead Library during regular business hours.

Response: SCWA responded to this request on August 19, 2026.

2.18 Monroe Analysis

Comments WBB-6, WBB-7, WJS-40, WJS-41, H3BB-9, H3BB-10, H3BB-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 as Lead Agency, against the Town of Riverhead. 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.

The issue of immunity is separate and distinct from a SEQRA review. Nevertheless, the SCWA's Monroe Test determination is included 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. SCWA has 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 decision. This action by the Lead Agency is unacceptable and taints the SEQRA record.

The DEIS in Section 3: Zoning 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 Agencies) of this DEIS."

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?

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 Station 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.

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 common 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.

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.

For example, if one travels from Route 105 east to Edgar Avenue (where the Aquebogue Elementary School is located) it is a distance along Route 25 of about 4,500 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.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with *County of Monroe v. City of Rochester*, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comment WSC-3: I would like to comment on the position the Town of Riverhead has taken with regard to this 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. This is a complete waste of taxpayer funds by the Town of Riverhead.

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.

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 Road and West Main Street in the Town of Riverhead. I do not recall the Town of Riverhead requiring site plan approval and or building permits. Yet another example I offer is at my present place of employment. 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.

The facts overwhelmingly support SCWA, their authority, and proposed project to complete the North Fork Water Main project. I again question the Town of Riverhead motives behind their self-fabricated obstacles in delaying and litigating this matter.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comment WKR-1, H3KR-2: During the SCWA Monroe Hearings of October 9, 2025, I noted that other than the 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.

1. “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).
2. 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.
3. 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.
4. 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.
5. Any official decisions, votes, or formal proceedings undertaken without a quorum are legally invalid.
6. 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.

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.

I also note that 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. Any official decisions, votes or formal proceedings undertaken without a quorum are legally invalid.

While a Board can delegate day-to-day administration tasks or fact-findings to staff or committees, the core official proceedings and final finding actions of the Board itself require a valid quorum to initiate or ratify. In the absence of a quorum, attendance can only fix the time to adjourn, recess and take steps to gather a quorum.

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

As an elected representative of the people of 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 the safety of the town. I do not support the Suffolk County Water Authority's Monroe Test outcome and find no reasons why the Authority would so strongly resist compliance with our land use regulations which are designated to protect the public and our natural resources.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comment WJS-10: 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."

In the letter she states,

“Moreover, SCW A 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 quality issue, SCW A’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.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with *County of Monroe v. City of Rochester*, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comment WJS-14, WJS-6:: 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).

During the SCWA Monroe Hearings of October 9, 2025, Town Board member Kenneth Rothwell noted that other than the 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.

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 muddled its own waters.

Immunity from Riverhead's land use approvals, is a significant DEIS issue, with underlying 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.

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.

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 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.

Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

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.

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 the Court settles all litigation, the SEQRA record will and must remain open.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comments WJS-20, H2NK-1, H2NK-2, H2NK-3, WST-5: Within the content of the DEIS SEQRA (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 SEQRA North Fork Project **is not immune** from any of Riverhead's required land use approvals (including site plan, building and fire marshal approvals, inspections, SWPPP, excavation & grading, wetlands, etc.). Town Board Resolution #2025-860 should be included in the text of the DEIS. Although the SEQRA 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.

The Trustees of Southold Town authorities derive from the address patterns of 1676, charging the Town proceeds with the administration of all activity within a hundred feet of our wetlands and beaches, including lands held in common such as the underwater lands in the Peconic Bay.

This is why we're concerned that the town -- that Southold Town is only listed as an interested agency on the Draft Environmental Impact Statement rather than as an involved agency. As it stands, Southold Town and the Trustees would only be notified of work done within 150 feet of Town wetlands, implying that the Suffolk County Water Authority would not seek a wetlands permit through Town Trustees.

This is particularly troubling, since you received road-opening permits from the Suffolk County Department of Public Works and coordinating with New York State DOT as involved agencies yet treat the Town wetlands jurisdiction of the very same project as notification only.

Sixty-seven acres of wetlands identified in the United States Fish & Wildlife Services exists within the buffer zone of the projects in the Phase 2 portion of the project alone. We request that the Trustees of Southold Town be considered an involved agency. Doing so will allow the Trustees to work to protect this vital habitat and uphold the authority granted 350 years ago to the Town of Southold.

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.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do

so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comment H3KC-1: I'm happy about your commitment to conservation, and if I lived in Southold I'd probably be thrilled. But I don't, I live in Aquebogue off of West Lane with a with an historic cemetery at the base of the hill on Main Road. The Monroe determination was based on the earlier Sound Avenue route and it shouldn't merely be incorporated into the revision. A fresh determination may show similar reasons to not use the Main Road.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comment WRD-4: 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.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comments WJS-15, WJS-16, Comment WSLM-2: 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.

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.

The Town of Southampton Department of Land Management 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.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

2.19 SCWA Authority and Decision-Making Process

Comment WJS-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, 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.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338

(1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

Comment H3KR-1: During the Suffolk County Water Authority Monroe Hearings on October 9th, I noted that – other than the CEO of Suffolk County Water Authority and Suffolk County Water Authority representatives attorneys – the full SCWA Board of Directors was absent from the Monroe Hearing and I questioned the validity.

Suffolk County Water Authority's Board of Directors physically conducted the Monroe Hearing. There was no Suffolk County Water Authority Board forum present at the hearings. Nevertheless, the Board, lead agency, somehow passed the Suffolk County Water Authority resolution finding itself immune from all local land use regulations.

What I stated, and this is included in the Suffolk County Water Authority transcript, "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 perpetuated or prudent Monroe Hearing taking place. And is this a singular decision or one of the Suffolk County Water Authority that is notably absent?"

The observation here is that the Suffolk County Water Authority Board of Directors – Charles Lefkowitz, Elizabeth Mercado, John Porchia, John Rose and William Davidson -- were noted as all absent. A quorum of the Suffolk County Water Authority Board was not present during any of the Monroe Hearings held on October 7th, 8th and 9th.

It is my understanding a Monroe Balance Test Hearing is an official public proceeding held by a local government board -- such as a Town Board, a governmental authority or a zoning board -- to weigh competing public interest and decide if a public project is immune from local zoning tools. This is precisely why a quorum of the Riverhead Town Board was present during its Monroe Hearing Test Public Hearing and we were all here as official proceedings.

Response: By resolution dated November 20, 2025, SCWA determined that the Project is immune from local zoning in accordance with County of Monroe v. City of Rochester, 72 N.Y.2d 338 (1988). See Appendix C of the DEIS. That resolution has not been challenged and the time to do so has passed. Although the Town of Riverhead adopted a resolution dated October 7, 2025, in which it concluded that SCWA is subject to Riverhead's Zoning Code, SCWA timely challenged that Resolution in an action that is currently pending before Suffolk County Supreme Court.

2.20 Third Party Monitoring and Oversight

Comment WRD-5: 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.

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.

Response: The comment recommends a jointly funded, independent monitor to provide real-time oversight and report to SCWA, affected municipalities, and permitting agencies. SCWA does not propose retaining a separate third-party monitor. Instead, SCWA will appoint a special construction manager/environmental compliance liaison to oversee daily construction and verify compliance with mitigation commitments and applicable permit conditions.

Before construction, the final plans and specifications would define the liaison’s qualifications, authority, inspection frequency, documentation requirements, reporting recipients, and corrective-action procedures. Inspection records would identify observed conditions, applicable requirements, deficiencies, corrective actions, responsible parties, and closure dates. Material noncompliance would be reported promptly to SCWA and the agency having jurisdiction, and unresolved issues would be tracked through completion. Public complaints submitted through the project webpage would be logged, referred to responsible project personnel, and addressed through the established response and escalation process.

The liaison would also coordinate traffic controls, public-safety measures, school-zone precautions, access for abutting properties, and real-time public construction information. The liaison would monitor and document contractor performance, communicate deficiencies, and

verify corrective action, but would not replace the inspection, permitting, or enforcement authority of NYSDEC, NYSDOT, Suffolk County, or other agencies having jurisdiction. Contractors would remain responsible for complying with all contract requirements, mitigation commitments, and permit conditions.

2.21 Real-Time Public Information During Construction

Comment WRD-7: 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.

Response: Comment acknowledged. Before construction begins, SCWA will establish and maintain a public construction-information website providing current work locations, anticipated schedules, traffic congestion and detours, access restrictions, construction expectations, project delays, project progress, and public-safety information. The website will be updated as conditions change and will provide a method for members of the public, businesses, community organizations, and municipalities to submit questions, complaints, and reports of potential violations. See **Section 1.6, “Project Modifications and/or Additional Mitigation Measures,”** of the FEIS for additional details.

2.22 Miscellaneous Comments

Comment WJS-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 1,000 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.

Response: SCWA acknowledges that reviewing a lengthy DEIS distributed across separate digital files can require readers to move repeatedly among the main text, appendices, figures, maps, plans, and supporting studies. The size and organization of the DEIS reflect the breadth of the Proposed Action, the requirements of the Final Scope and SEQRA's "Hard Look" standard, and the need to provide the public, involved and interested agencies, and local governments with the technical information necessary to evaluate potential impacts, alternatives, and mitigation measures.

To reduce the burden of review and provide reasonable public access, SCWA made the DEIS available online for review and download, and also provided paper copies at several public locations within or near the project study area. This included availability at the SCWA's official website, Town of Riverhead's official website, SCWA's Westhampton office, Southold Free Library, and Riverhead Public Library. These locations were intended to support and facilitate review by residents, municipal staff, local officials, agencies, and other interested parties who may prefer or require access to hard-copy materials. Notice materials also identified how the public could access the DEIS, submit written comments, and participate in the public hearing process.

SCWA also provided a 64-day public comment period after granting an additional two-week extension, more than doubling the minimum 30-day DEIS comment period required under SEQRA. The extended period provided additional time to review the DEIS text, figures, maps, appendices, and supporting materials. SCWA acknowledges that the electronic organization required readers to move among multiple files; however, the materials were also available in paper form at identified public locations, and the extended comment period provided the public and involved and interested agencies additional opportunity to review the record and submit substantive comments. The detailed figures, maps, appendices, and technical reports were included to support informed review of a large public infrastructure project.

Comments WJS-2, WJS-5: 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. 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.

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.

Response: The DEIS is not a Generic Environmental Impact Statement; it evaluates a specific proposed water transmission project, including identified routes, booster station sites, construction methods, project phasing, alternatives, and mitigation measures. The DEIS also includes a routing and alternatives comparison because SEQRA requires the Lead Agency to evaluate reasonable alternatives before making final findings. The inclusion of routing analysis does not make the document generic or render the environmental review insufficient.

The maps, figures, plans, and drawings in the DEIS are presented at different scales because they serve different purposes. Regional resource maps, such as NYSDEC wetland inventory maps, show the broader environmental setting and jurisdictional context. Aerial figures show surrounding land uses and corridor conditions. Booster-station plans focus on individual parcels and therefore use a more detailed site scale, while preliminary water-main plans use a still more detailed engineering scale to show the anticipated alignment within roadway corridors. Different scales allow the document to present both corridor-wide conditions and parcel- or construction-level details for a study area extending many miles.

The DEIS identifies mapped wetlands, surface waters, hydric soils, cultural-resource areas, adjacent land uses, and other environmental constraints and resources using the best available information appropriate to the SEQRA review stage of the project. Field reconnaissance and route inspections were also conducted along the Phase 1 and Phase 2 routes and at the booster-station sites to identify existing corridor conditions and potential constraints. Together, these sources support disclosure of potential impacts and identification of avoidance, minimization, and mitigation measures. The DEIS is not intended to function as the final construction drawing set for every project segment.

More detailed site-specific information will be developed during final design, permitting, and construction planning. SCWA and its consultants will use final engineering plans, field verification, agency coordination, and applicable permit conditions to confirm utility locations, construction limits, staging areas, wetland-adjacent work areas, and other sensitive-resource constraints. Where work is proposed near wetlands, surface waters, cultural resources, utilities, adjacent properties, or other sensitive features, the final plans and construction controls will avoid or minimize disturbance by locating work within existing disturbed road rights-of-way where practicable; using directional drilling at sensitive crossings; placing staging areas and drill pits as far away from regulated areas as feasible; implementing erosion and sediment controls; managing excavated soils and drilling slurry; and stabilizing and restoring disturbed areas after construction.

Comment WRD-15: Based on the Group for the East End’s 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.

Response: Comment acknowledged. The DEIS evaluates the Main Road Preferred Alternative and identifies route-specific impact-reduction measures. **Section 1.6** of the FEIS describes additional public-outreach and construction-information measures, including public an agency project information updates during construction. SCWA will appoint or retain a project manager and public liaison to coordinate public information and oversee implementation of applicable project requirements. SCWA’s ongoing planning and operations also address municipal coordination, public engagement, sustainable booster-station design, coastal resiliency, and post-storm continuity of water service. The environmental review includes Phase 2 and evaluates buildout within the Orient Hamlet service area as part of the Proposed Action. Broader growth analyses under current zoning for other towns and communities are outside the scope of the project and DEIS. Applicable final mitigation commitments and final project conditions will be identified in the SEQRA Findings Statement.

2.23 General Support

The following comments express general support for the proposed project and confidence in SCWA’s environmental review and mitigation commitments. Because they do not raise new

substantive environmental issues, they are acknowledged below without additional technical analysis.

Comment WSC-1: 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.

Response: Comment acknowledged.

Comment WDW-1: 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.

Response: Comment acknowledged.