



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 07 2011

Mr. Elkins Q. Green
Director, Division of Environmental Program Resources
State of New Jersey
Department of Transportation
P.O. Box 600
Trenton, New Jersey 08625-0600

Dear Mr. Green:

The Environmental Protection Agency (EPA) has reviewed the Federal Highway Administration's (FHWA) Halls Mill Road and Elton-Adelphia Road (CR524) Draft Environmental Assessment (EA) dated May 2011. The purpose of the project is to construct improvements to Halls Mill Road, Elton-Adelphia Road and Edinburgh Road to relieve congestion and improve the operations of the roadways within the project limits through improvements to current roadway and intersection geometry. The segments addressed are 1.25 miles of Halls Mill Road and 0.3 miles of Elton-Adelphia Road. The project would upgrade these existing roads to serve as an alternative north-south route to Route 9. The project is located in the Town of Freehold, Monmouth County, New Jersey.

EPA has several concerns with the EA. Primarily, we are concerned that the document does not provide a solid foundation for the purpose and need of the project as it does not provide a traffic analysis, nor does it incorporate a discussion of context sensitive and livability principles. Also, the EA does not discuss indirect or cumulative impacts. This analysis should include, but not be limited to, the recently completed intersection improvement at State Highway Route 9 and Elton-Adelphia Road, and an analysis of how the proposed improvements would affect congestion on Route 9 given the relatively short distance involved. We have also enclosed a list of technical comments with this letter.

EPA also suggests that while the preferred alternative would remove the existing bridge F-59 over Applegates Creek, the New Jersey Department of Transportation and FHWA should explore other bridging options that would create wildlife and fish passage underneath Elton-Adelphia Road and improve habitat along Applegates and Debois Creek for safety, supplemental mitigation and community sustainability.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Grace Musumeci".

Grace Musumeci, Chief
Environmental Review Section

Enclosure

cc: Tony Sabidussi, FHWA-NJ

**EPA Comments on Halls Mill Road and Elton-Adelphia Road (CR 524)
Improvement Project, Freehold and Howell Townships,
Monmouth County, New Jersey
Environmental Assessment dated May 2011**

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1. Page 2-1, Section 2.1. The reader should be directed to Figures 1 and 2. Roads, bridges and streams (i.e., Halls Mill Road, Elton Adelphia Road, Burkes Creek, Applegate Creek and associated bridges) must be clearly identified in Figure 2.
2. Page 2-1, Section 2.1. If there is a separate Needs Assessment which is being incorporated by reference into the Environmental Assessment, it should be included in the appendices or easily available on the internet with the URL provided in the EA.
3. Page 2-2, Section 2.3. Crash data should be detailed by road sections. Do the individual project areas, or the project area as a whole, have a higher percentage of accidents as compared to state-wide statistics? Were most accidents due to speeding? Identifying particular sections of the project individually would assist the safety discussion. For example, the document states that “substandard sight distances also contributes to potential crashes due to numerous driveways along this roadway,” however, Edinburgh Road seems to have no residential driveways, and Halls Mill Road appears to only have 11 driveways just south and 2 driveways north of Three Brooks Road. This does not seem unreasonable for a 35 MPH road.
4. Page 2-2, Section 2.3. Which of the roadways are identified as Urban Minor Arterial roadways? What are the minimum standards for that type of arterial?
5. Page 2-3, Section 2.4. The Traffic Report – Elton-Adelphia Road 9 (CR 524)/Hall Mill Road Improvements Project should be included in the appendices, or easily available on the internet with the URL provided in the EA. Without the traffic report available, it is not possible to determine the need for the project and know whether the chosen alternative will meet the purpose and need.
6. Page 3-1, Section 3.1. Please discuss the model/information used to project a 50% increase in traffic for the project area by 2025, and how that compares to the state Department of Transportation projections.
7. Page 3-4, Section 3.3. Identify the location of the NJNG Gas Transfer Station on a map. Figure 9 does point out the area, but the site is not definitive.

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8. Page 3-4, Section 3.3. Are the AASHTO and NJDOT standards discussed those for an Urban Minor Arterial?
9. Page 3-4, Section 3.3, last sentence. This sentence appears to be out of place.
10. Page 3-5, Section 3.3.1. Provide specific information as to why only one alternative met the purpose and need for the Elton-Adelphia Road.
11. Page 3-5, Section 3.3.1. Provide a diagram of the typical cross section of the 62' proposed improvements to Elton-Adelphia Road, including bicycle lanes and pedestrian sidewalks. A map comparing the "minor adjustments to the horizontal alignment" to the no build should be provided.
12. Page 3-5, Section 3.3.1. This section discusses the removal of an existing bridge F-59 over Applegates Creek, with the construction of an underground storm drain system. Federal Highways Administration guidance and stewardship priorities suggest that bridge structures should be replaced with new structures that include fish and wildlife passages. EPA is also concerned that the floodplain is already constricted at this point and further constriction would not be advisable.
13. Page 3-5, Section 3.3.1. The proposed improvements to the existing bridge F-30 over Debois Creek should be diagrammed.
14. Page 3-6, Section 3.3.2. Provide a cross sectional diagram of the proposed widening of Edinburgh Drive to 66', including the median, bicycle lanes and sidewalks. EPA is concerned that widening the Edinburgh Road with a median will increase the emissions near backyards and residences.
15. Page 3-6, Section 3.3.2. The document states that increasing movements at the intersection of Edinburgh Drive and Elton Adelphia Road will permit the conversion of Spy Glass Hill Road to a cul-de-sac. Was this conversion added to or part of the traffic model?
16. Page 3-6, Section 3.3.2. The document states that "a reduction in the number of lanes south of CR 524 will require a merge." Is it assumed the merge would be at the CR 524 or on Edinburgh Drive?

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17. Page 3-7, Section 3.3.3. EPA reminds FHWA and the applicant that “additional impacts resulting from the addition of a median” may be the same in all alternatives, but must be addressed in the environmental assessment, not the final design phase.
18. Page 3-8, Section 3.3.4. Why is the proposed Halls Mill Road being designed for 50 MPH? This would seem to make the area less suitable for walking and biking. Will Edinburgh Drive also be rated at 50 MPH?
19. Page 5-2, Section 5.2. Provide hydraulic or other modeling to show that the project will not impact the water surface elevation of the Flood Hazard Area design flood. Before making a Finding of No Significant Impact determination, the closure of Applegates Creek and any placement of new bridge pilings in Debois or Burke Creeks must be clearly identified to ensure there is no significant increase in floodway or floodplain elevation.
20. Page 5-5, Section 5.5. The Letter of Interpretation from the New Jersey Department of Environmental Protection is not included in the EA.
21. Page 5-8, Section 5.6. Any reseeded of the area after construction should use native plant seeds only. EPA also suggests that an invasive plant species management plan be instituted as part of the mitigation for the Manasquan River Stream Valley.
22. Page 5-9. Section 5.7. As the Halls Mills Road project will be replacing bridges over streams and floodplains, EPA believes this would be good project to design and construct substantial wildlife and fish passage benefits for the area. Wildlife passages underneath Halls Mills Road and Elton-Adelphi Road would help keep small mammals, reptiles and deer off the roads, and increase safety. Also, a creative bridging structure over Applegate and Debois Creek may increase the habitat values in the area for snapping turtle, eastern painted turtle and northern watersnake.
23. Page 5-12, Section 5.10. Define “sole excavation route.” Also, please refer to comment #20.

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24. Page 5-13, Section 5.12. As the project is located over the Coastal Plain Sole Source Aquifer, it must be reviewed by EPA under Section 1424(e) of the Safe Drinking Water Act of 1974 (Public Law 93-523, 42 U.S.C. 300 et seq.). The EA does not provide enough information regarding storm water runoff for us to complete this review.
25. Page 5-16, Section 5.13. The document states that “the future traffic volumes would increase by a negligible 4% compared to the “No Build” conditions at the critical intersection of Elton-Adelphi Road and Halls Mill Road.” In what year will that increase be? Previously the document stated there would be a 50% increase in traffic in the project area by 2025.
26. Page 5-17, Section 5.13. Provide the assessment that concluded that “based on the improved traffic flow through the project corridor, pollutant levels associated with vehicle emissions would be reduced” up until 2025.
27. There is no discussion of indirect or cumulative impacts.