

**APPENDIX C**

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**Correspondence Related to the Project**



# New Jersey Turnpike Authority

ADMINISTRATION BUILDING P.O. BOX 1121 NEW BRUNSWICK, NEW JERSEY 08903  
TELEPHONE (732) 247-0900

RICHARD J. CODEY  
ACTING GOVERNOR

**VIA FEDERAL EXPRESS**

JOSEPH SIMUNOVICH, *Chairman*  
JOSEPH (J.P.) MIELE, *Vice Chairman*  
JOHN HIBBS, *Treasurer*  
LUIS FERNANDEZ, *Commissioner*  
HAROLD L. HODES, *Commissioner*  
DAVID G. EVANS, *Commissioner*  
HARRY LARRISON Jr., *Commissioner*  
JOHN LETTIERE, *Commissioner*  
MICHAEL LAPOLLA, *Executive Director*

February 4, 2005

Mr. Gary Kasoff, United States Coast Guard  
Bridge Program Manager  
One South Street  
Battery Park Building  
New York, NY 10004-5073

**RE: NEW JERSEY TURNPIKE AUTHORITY  
TREMLEY POINT CONNECTOR ROAD PROJECT - OPS 2052  
REQUEST FOR JOINT PERMIT PROCESSING MEETING**

Dear Mr. Kasoff:

The New Jersey Turnpike Authority (NJTA) requests a Joint Permit Processing Meeting (JPPM) with the United States Coast Guard (USCG), Army Corps of Engineers (ACOE), United States Environmental Protection Agency (USEPA), National Marine Fisheries Service (NMFS) and the United States Fish and Wildlife Service (USFWS). This request pertains to the proposed development of the Tremley Point Connector Road Project with an associated bridge over the Rahway River between the Borough of Carteret, Middlesex County and the City of Linden, Union County, New Jersey. In this regard we are providing a synopsis of the project, which you and Mr. Ernest Feemster of your department have previously received, to each of the JPPM agency attendees.

It is requested that a pre-application meeting be scheduled at your earliest convenience so that we may discuss the proposed work activity and determine the specific application requirements and agency coordination for the project. It would be appreciated if this meeting could be scheduled no later than Friday, March 4, 2005.

Please be advised that Mr. Gregory S. Oross of Edwards and Kelcey will be contacting you in the next few weeks to schedule this meeting. If you wish to contact him in the meantime he can be reached at 973-267-8830 ext. 1264. Thank you for your consideration.

Very truly yours,

Richard M. Brundage, P.E.  
Project Engineer

Enclosure  
RMB/ks

cc: Richard J. Raczynski, P.E., NJTA (w/enclosure)  
Robert J. Grimm, P.E., NJTA (w/enclosure)  
J. Lawrence Williams, P.E., NJTA (w/enclosure)  
John M. Keller, P.E., NJTA, (w/enclosure)  
Congressman Robert Menendez, (w/enclosure)  
Dan Montella, USEPA (w/enclosure)  
Stan Gorski, NMFS (w/enclosure)  
Clifford Day, USFWS (w/enclosure)  
Michael Vissichelli, Section Chief, ACOE (w/enclosure)  
Richard Tomer, Chief, ACOE (w/enclosure)  
William McLaughlin, NJDEP, LURP (w/enclosure)  
Ernest Feemster, USCG  
John Bolan, P.E., PS&S, LLC  
Ingro Desvousges, PS&S, LLC  
Frank Lopatosky, P.E., EK  
Neal Toglia, P.E., EK  
Greg Oross, P.E., EK  
File, (w/enclosure)



# New Jersey Turnpike Authority

ADMINISTRATION BUILDING P.O. BOX 1121 NEW BRUNSWICK, NEW JERSEY 08903  
TELEPHONE (732) 247-0900

RICHARD J. CODEY  
ACTING GOVERNOR

March 18, 2005

JOSEPH SIMUNOVICH, *Chairman*  
JOSEPH (J.P.) MIELE, *Vice Chairman*  
JOHN HIBBS, *Treasurer*  
LUIS FERNANDEZ, *Commissioner*  
HAROLD L. HODES, *Commissioner*  
DAVID G. EVANS, *Commissioner*  
HARRY LARRISON Jr., *Commissioner*  
JOHN LETTIERE, *Commissioner*  
MICHAEL LAPOLLA, *Executive Director*

Mr. Gary Kassof  
U.S. Coast Guard  
Commander (obr) First Coast Guard District  
One South Street – Battery Building  
New York, New York 10004-5073

RE: New Jersey Turnpike Authority  
Tremley Point Connector Road  
Borough of Carteret, Middlesex County and  
City of Linden, Union County, New Jersey  
**Lead Agency Determination**

REC  
MAR 21 2005

Paulus Sokolowski

Dear Mr. Kassof:

The New Jersey Turnpike Authority (Authority) would like to thank the U.S. Coast Guard (USCG) for conducting the March 2, 2005 NEPA Inter-Agency Consultation Meeting for the Tremley Point Connector Road (TPCR) project. The TPCR will traverse a total of 1.2 miles, originating at Industrial Road in the Borough of Carteret, Middlesex County, crossing the Rahway River with a new bridge and terminating at Tremley Point Road in the City of Linden, Union County. The Authority is the project sponsor for the TPCR project.

As presented at the Consultation Meeting, seven alternative TPCR alignments, in addition to alternative designs for a new interchange (12A), have been evaluated. All of the alternative alignments share a purpose and need of providing the appropriate access necessary to redevelop up to 200 acres of brownfield areas located on Tremley Point. The project purpose and need is also consistent with "Smart Growth" legislation and the planning policy of brownfield redevelopment described in the *New Jersey State Development and Redevelopment Plan*.

Currently, there are several refined petroleum bulk storage and recycling facilities operating on Tremley Point and their only access to major roadways, such as Route 1&9 and the Turnpike, is to travel through a residential section of Linden on Wood Avenue. As such, the existing vehicular traffic, primarily trucks that are based on Tremley Point, cause unacceptable noise and air quality impacts to the residential areas situated along Wood Avenue. Therefore, the City of Linden has been unable to implement the redevelopment of the brownfields at Tremley Point due to the additional traffic that would be generated and its subsequent adverse impact upon the existing residential areas.

In addition to the redevelopment of brownfield areas, the proposed TPCR will encourage a significant volume of truck traffic to abandon the use of Tremley Point Road/Wood Avenue and instead utilize the TPCR to access the Turnpike via Interchange 12.

As stated at our meeting, the TPCR will require both a Section 9 bridge permit from the USCG and a Section 10/404 permit from the U.S. Army Corps of Engineers (USACE). Thus, the USACE and USCG both have regulatory jurisdiction for the project. A lead agency for the NEPA process needs to be determined. It would be appreciated if a decision is made and we are informed by March 31, 2005.

Also, during the Consultation Meeting, it was discussed that the Authority is proposing several geotechnical borings in the Rahway River for an evaluation of the existing geological conditions in the river for the design of the proposed bridge. The NJDEP is currently reviewing a Waterfront Development Permit application for the proposed geotechnical boring program. The Authority was requested to contact the USCG for the federal requirements for conducting a safe and efficient geotechnical boring program in the river. It is anticipated that there will not be any permanent mooring of vessels in the river in order to conduct the boring program; nor will the vessel taking the samples pose a hindrance to navigation by other vessels on the river. As discussed with Mr. Ernest Feemster of your office, E&K, the Authority's Consultant for the project, has contacted Mr. Jeff Yunker, USCG, Waterways Management Coordinator, to discuss the project. If necessary, please provide any additional USCG requirements for these borings.

The Authority and its Consultants are poised to move ahead with the NEPA process for the TPCR and look forward to working with the federal and state agencies in bringing this important public project to fruition. If you have any questions concerning this correspondence, please do not hesitate to contact the undersigned or Mr. Frank Lopatosky, P.E., Edwards & Kelcey, at 973-267-8830, Ext. 1277.

Sincerely,



Richard Brundage, P.E.  
Project Engineer

RMB/ks

cc: R. Raczynski, P.E., NJTA  
R. Grimm, P.E., NJTA  
J. L. Williams, P.E., NJTA  
J. M. Keller, P.E., NJTA  
F. Lopatosky, P.E., E&K  
N. Toglia, P.E., E&K  
I. Desvouses, PS&S  
M. Vissichelli, USACE  
S. Ettinger, USACE  
File



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE



In Reply Refer to:

PL-NY-05/147

New Jersey Field Office  
Ecological Services  
927 North Main Street, Building D  
Pleasantville, New Jersey 08232  
Tel: 609/646 9310  
Fax: 609/646 0352  
<http://njfieldoffice.fws.gov>

MAY 18 2005

Gary Kassof, Bridge Program Manager  
First Coast Guard District, United States Coast Guard  
One South Street, Battery Building  
New York, New York 10004

Dear Mr. Kassof:

This provides the preliminary comments of the U.S. Fish and Wildlife Service (Service) regarding the proposed Tremley Point Connector Road to be located in Carteret Borough, Middlesex County and Linden City, Union County, New Jersey. The project is proposed by the New Jersey Turnpike Authority (NJTPA). The Service attended a March 2, 2005 pre-application meeting and an April 4, 2005 site visit. The Service has also reviewed a Project Summary Document dated January 25, 2005.

The currently preferred alternative is an approximately 1.2-mile road connecting Industrial Road in Carteret near Interchange 12 of the New Jersey Turnpike with Tremley Point Road in Linden. The preferred alignment is primarily through wetlands, and would be constructed on a combination of retaining walled (fill) and viaduct (elevated) structures. The project would include a new bridge, approximately 35 feet high, over the lower Rahway River. The preferred alternative would impact approximately 8.1 acres of wetlands through a combination of shading and fill; the acreages of shading versus fill impacts are not yet available.

The Tremley Point project would require authorization from the U.S. Coast Guard (USCG) pursuant to Section 9 of the Rivers and Harbors Act of 1899 (30 Stat. 1151, as amended; 33 U.S.C. 403 *et seq.*) and/or the General Bridge Act of 1946 (P.L. 79-601, Title V. 60 Stat. 847). The project would also require authorization from the U.S. Army Corps of Engineers, New York District (Corps) via Department of the Army permit pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344 *et seq.*) (CWA) and Section 10 of the Rivers and Harbors Act of 1899. As of the April 4 site visit, the USCG and the Corps had not yet determined the lead federal agency for the project.

**RECEIVED**

MAY 18 2005

Paulus Sokolowski & Sartor

## **AUTHORITY**

This response is provided pursuant to the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*); the National Environmental Policy Act of 1969 as amended (83 Stat. 852, as amended; 42 U.S.C. 4321 *et seq.*) (NEPA); the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) (ESA); the Migratory Bird Treaty Act of 1918 (40 Stat. 755, as amended; 16 U.S.C. 703-712); and is consistent with the intent of the Service's Mitigation Policy (Federal Register, Vo. 46, No. 15, Jan. 23, 1981). These comments are provided as preliminary input and do not preclude separate review and comments on future permit applications and/or NEPA documents, pursuant to above-mentioned authorities.

## **FEDERALLY LISTED SPECIES**

Except for an occasional transient bald eagle (*Haliaeetus leucocephalus*), no other federally listed or proposed endangered or threatened flora or fauna under Service jurisdiction are known to occur within the vicinity of the proposed project site. Therefore, no further consultation pursuant to Section 7 of the ESA is required by the Service. If additional information on federally listed species becomes available, or if project plans change, this determination may be reconsidered.

## **OTHER SPECIES OF CONCERN**

The New Jersey Department of Environmental Protection's (NJDEP) Landscape Project maps show that wetlands to be crossed by the proposed road provide foraging habitat for colonial-nesting waterbirds including the State-listed (threatened) black-crowned night-heron (*Nycticorax nycticorax*) and yellow-crowned night-heron (*Nyctanassa violaceus*) (Niles *et al.*, 2001). The Service recommends that any forthcoming environmental documents for this project include the views and recommendations of the New Jersey Endangered and Nongame Species Program regarding impacts to these species.

Dr. Larry Niles  
Endangered and Nongame Species Program  
Division of Fish and Wildlife  
P.O. Box 400  
Trenton, New Jersey 08625  
(609) 292-9400

## **OTHER FISH AND WILDLIFE RESOURCES**

The wetlands to be crossed by the proposed road are dominated by common reed (*Phragmites australis*) and largely impacted by historic and ongoing industrial uses in the immediate vicinity. These wetlands likely contain elevated levels of environmental contaminants, based on preliminary information provided by project sponsors and the NJDEP (Shah, pers. comm., 2005), as well as the presence of a municipal landfill, a deed-restricted contaminated site, and surrounding industrial land uses. Despite these impairments, the Service does not concur with

statements in the Project Summary Document that “areas to be disturbed have limited habitat value, due to prevalence of common reed and urbanized environment.”

The wetlands to be crossed are part of a larger wetland complex bounded by Tremley Point Road to the north, the New Jersey Turnpike to the west, Industrial Road to the south, and the Arthur Kill to the east (the “Carteret Arch” of the Rahway River). Although much of this area has been converted to industrial use, over 350 acres of wetlands remain, representing one of the largest remaining areas of wetlands and open space in the highly urbanized Arthur Kill watershed.

*Phragmites* marshes are known to provide nesting and foraging habitat for numerous native bird species, including red-winged blackbirds (*Agelaius phoeniceus*), State-listed species such as night-herons, State species of concern such as little blue heron (*Egretta caerulea*), and declining species such as marsh wren (*Cistothorus palustris*) (Kane, 2001; Parsons, 2003; Ludwig *et al.*, 2003). Among the 53 species of birds known to breed in the vicinity of the project site are red-winged blackbird, marsh wren, swamp sparrow (*Melospiza georgiana*), green heron (*Butorides striatus*), red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*) (State species of concern), spotted sandpiper (*Actitis macularia*) (State species of concern), and wood thrush (*Hylocichla mustelina*) (Service species of conservation concern; U.S. Fish and Wildlife Service, 2002) (Walsh *et al.*, 1999).

Within New Jersey’s urban northeast, large wetlands also provide essential stopover habitat for birds during migration. Habitats used during migration may be equally important to breeding and wintering grounds to the survival of a species. Migrating birds following “programmed” pathways must be able to satisfy energy requirements, avoid predators, and minimize environmental stress during stopovers (U.S. Fish and Wildlife Service, 1997). New Jersey’s latitude, geography, and habitats make it a critical State for bird migration (Dunne, 1989; New Jersey Audubon Society, 2004). The Hudson River and the urban core of the New York City metropolitan area provide important migration corridors and stopover habitat for Neotropical migrant landbirds (U.S. Fish and Wildlife Service, 1997). A large number of migratory birds are funneled through the New York urban core by the orientation of the coastline and other geographic features of the area, and these birds are further concentrated in the small amounts of remaining open space. The region’s rivers concentrate migrants, especially during fall migration when birds get pushed to the shorelines by strong northwesterly winds. Woodlands and wetlands along these rivers are critical to migrants (Dunne, 1989; New Jersey Audubon Society, 2004). Even isolated pockets of habitat along major river corridors provide essential stopover habitats, serving as “urban oases” for energetically-stressed migrants. Protection of remaining open space and restoration of additional areas is a priority in the urban core (Dunne, 1989; U.S. Fish and Wildlife Service, 1997; Maryland Partners in Flight, 1998; Rosenberg *et al.*, 1999; New Jersey Audubon Society, 2004).

In addition to providing habitats for birds and other wildlife, *Phragmites*-dominated marshes provide high rates of sediment stabilization and accretion. This characteristic of *Phragmites* can reduce the value of a wetland for wildlife (*i.e.*, by reducing the wetland character of the system, reducing microtopography, limiting access of aquatic organisms to the marsh surface, and limiting trophic transfers to higher levels and adjacent open waters). However, in contaminated wetlands, the sediment-binding properties of *Phragmites* provide a service to fish and wildlife by

reducing mobility of and exposure to environmental contaminants (Ludwig *et al.*, 2003; Chambers *et al.*, 1999; Osgood *et al.*, 2003).

## **ENVIRONMENTAL DOCUMENTATION**

### **New Jersey Executive Order 215**

The NJTPA has prepared a Preliminary Draft Environmental Impact Statement (PDEIS) pursuant to New Jersey Executive Order 215. The PDEIS has not yet been published or made available for agency or public review. The Service suggests making the State EIS available for public comment, either alone or combined with NEPA documentation (discussed below). Public and agency review should occur prior to application for federal and State permits, to allow for input into the selection of alternative routes and designs.

### **National Environmental Policy Act**

#### Criteria for Preparation of an Environmental Impact Statement

Regarding NEPA requirements, the Project Summary Document contains the following statement: "In general, the need for the preparation of an [Environmental Impact Statement] EIS is the result of a project resulting in more than one significant impact." The Project Summary Document goes on to suggest that the project will adversely impact only wetlands, with no adverse impacts to 12 other aspects of the human environment, including wildlife.

There is no reference to "more than one significant impact" as a condition of EIS preparation in the NEPA statute or the Council on Environmental Quality's (CEQ) regulations for implementing NEPA (40 CFR Parts 1500-1508). Rather, CEQ regulations cite the significance (*i.e.*, intensity or severity, as per Part 1508.27) of impacts as the determining factor in EIS preparation (Part 1501.4).

Further, the Service does not concur with the NJTPA's "No Adverse Impact" determination for wildlife. The project would impact approximately 8 acres of wetlands that provide habitat for wildlife, including State-listed species and migratory birds. The proposed roadway would also further fragment the larger, already impacted Carteret Arch wetland complex. The proposed wetland disturbance may also increase exposure of wildlife to environmental contaminants.

#### Mitigated Finding of No Significant Impact

The NJTPA proposes to prepare an Environmental Assessment (EA) pursuant to NEPA, with the desired outcome of issuing a Mitigated Finding of No Significant Impact (FONSI). The CEQ addressed Mitigated FONSI's in their Memorandum to Agencies (46 Federal Register 18026, March 16, 1981). The Memorandum states:

*Mitigation measures may be relied upon to make a finding of no significant impact only if they are imposed by statute or regulation, or submitted by an applicant or agency as part of the original proposal. . . . In some instances, where the proposal itself so integrates mitigation from*

*the beginning that it is impossible to define the proposal without including the mitigation, the agency may then rely on the mitigation measures in determining that the overall effects would not be significant. . . . Similarly, scoping may result in a redefinition of the entire project, as a result of mitigation proposals. . . . One example of this would be where the size and location of a proposed industrial park are changed to avoid affecting a nearby wetland area.*

The Service does not concur that the Tremley Point Connector Road, as currently proposed, fits this description of projects eligible for a Mitigated FONSI.

The CEQ Memorandum also states:

*. . . As a general rule, the regulations contemplate that agencies should use a broad approach in defining significance and should not rely on the possibility of mitigation as an excuse to avoid the EIS requirement. . . . If a proposal appears to have adverse effects which would be significant, and certain mitigation measures are then developed during the scoping or EA stages, the existence of such possible mitigation does not obviate the need for an EIS. Therefore, if scoping or the EA identifies certain mitigation possibilities without altering the nature of the overall proposal itself, the agency should continue the EIS process and submit the proposal, and the potential mitigation, for public and agency review and comment. This is essential to ensure that the final decision is based on all the relevant factors and that the full NEPA process will result in enforceable mitigation measures through the Record of Decision. . . .*

The proposed project appears to fit this description of projects for which an EIS should be prepared.

#### Appropriate Level of NEPA Documentation

Based upon the above CEQ guidance and the nature and extent of anticipated impacts to wetlands and wildlife, the Service suggests that an EIS is the appropriate level of documentation required pursuant to NEPA. Further, as discussed below, redevelopment of up to 200 acres of brownfields in Linden with warehouses and other industrial facilities will take place only if the proposed road is constructed. Therefore, all environmental impacts of the proposed redevelopment (e.g., air and water pollution, traffic, any additional wetland impacts) must be considered in the NEPA documentation for the Tremley Point Connector Road. Preparation of an EIS pursuant to NEPA is appropriate, particularly given the need to evaluate impacts from redevelopment.

#### Cumulative Impacts

The EIS prepared for this project must include an assessment of cumulative impacts (40 CFR 1508.25[c]). The Service recommends specifically addressing past, ongoing, and reasonably foreseeable impacts to wetlands and wildlife within the Carteret Arch wetlands complex, including fill, ditching, and contamination.

## **PURPOSE AND NEED**

The purpose of the proposed connector road is to provide Linden City and Union County access to the New Jersey Turnpike from the extensive areas of brownfields (up to 200 acres) north of Tremley Point Road that are proposed for redevelopment. These brownfields are known as the "Tremley Point – DuPont ISP" site, one of 17 sites under active consideration for redevelopment through the Acting Governor's Portfields Initiative to promote warehousing and distribution centers within New Jersey's portion of the Port District (New Jersey Economic Development Authority and Port Authority of New York and New Jersey, 2005). According to the Project Summary Document, Linden cannot approve redevelopment of these brownfield areas unless the additional truck traffic that would be generated is diverted away from downtown Linden. Currently, trucks travel through a residential area of Linden along Wood Avenue en route between the industrial facilities along Tremley Point Road to the east, and Routes 1&9 and the New Jersey Turnpike to the west.

Project sponsors have stated that diverting existing truck traffic from Wood Avenue is the primary project purpose, and subsequent brownfield redevelopment is a secondary purpose. However, at the April 4 site visit, NJDEP staff indicated that some Wood Avenue residents are opposed to the Tremley Point Connector Road. The Service recommends that the EIS include a summary of comments from these residents that explains clearly the reasons for their opposition. The EIS should also clarify if diversion of existing truck traffic from Wood Avenue is itself sufficient justification to build the road (*i.e.*, if road construction would proceed without the proposed brownfield redevelopment), including any cost-benefit comparisons the NJTPA has prepared for the connector road with and without the economic benefits of brownfield redevelopment.

## **ALTERNATIVES**

The NJTPA has evaluated seven alternative routes for the proposed road, as well as construction of a new interchange on the New Jersey Turnpike at Tremley Point Road ("Truck Only Interchange 12A"). The Service notes the efforts of the NJTPA to examine a wide range of alternative routes. However, at the meeting and site visit, the Service and other resource agencies recommended evaluation of additional alternatives that would utilize existing uplands in the Carteret Arch, specifically the Slayton Redevelopment Area (the former Carteret Landfill) or the Cytotec Industries (formerly American Cyanimid) property.

### **Truck Only Interchange 12A**

The Project Summary Document cites traffic operation problems as reasons why a new Turnpike interchange at Tremley Point Road was rejected as an alternative to the proposed project. These traffic problems were identified in a 2001 document entitled *Alternatives Study, Proposed Interchange 12A Truck Only Interchange*. This document should be summarized in the EIS and the complete document made available for the public review period.

The Project Summary Document indicates that 4 to 12 acres of wetlands would be impacted by a new Interchange 12A, depending on design alternatives. Maps of various interchange alternatives should be included in the EIS, along with side-by-side comparisons of wetland impacts, costs, and traffic concerns.

### **Alternative Routes Considered by NJTPA**

Of the seven alternative routes, only Alternative 1 would result in substantial reductions in wetland impacts. Compared to the preferred alternative, Alternative 1 would impact 0.4 acre of wetlands (versus 8.1 acres) and would cost approximately \$108.9 million (versus \$50 million). Besides cost, project sponsors also cite concerns that Alternative 1 would increase traffic impacts to a residential area along Roosevelt Avenue in Carteret. Given the substantial difference in wetland impacts, the Service does not view cost alone as sufficient justification to eliminate Alternative 1 from further consideration. In addition, the Service cannot ascertain from maps or the site visit how the referenced residential areas in Carteret would be impacted by increased traffic.

Project sponsors, however, have cited other factors that, with documentation, would render Alternative 1 infeasible: (1) the USCG Captain of the Port may reject the routing of Alternative 1 over or through petroleum storage facilities (Kinder Morgan and Citgo) due to homeland security concerns; and (2) the Federal Highways Administration (FHWA) and/or State authorities may reject the routing of Alternative 1 over or through flammable materials storage areas due to safety concerns. The Service recommends that the EIS contain statements from the Captain of the Port, as well as the FHWA and/or State authorities, demonstrating that Alternative 1 is not feasible.

Wetland impacts would be somewhat reduced by using Alternative 5 (7.5 acres) compared to the preferred alternative. In addition, Alternative 5 would cause substantially less fragmentation of wetlands north of the Rahway River, which consist of a relatively intact, 130-acre area along Marshes Creek. Therefore, the Service recommends presenting a detailed evaluation of Alternative 5 in the EIS.

### **Alternative Routes Not Considered by NJTPA**

#### Slayton Redevelopment Area

At the March 2 meeting and April 4 site visit, project sponsors indicated that routing the proposed road through uplands on the Slayton Redevelopment Area was not considered for the following reasons: (1) the roadway would cause economic impacts to warehouse facilities proposed for construction upon closure of the Carteret Landfill; (2) the high elevation of the site and its proximity to Industrial Road preclude placing the road over the site (*i.e.*, at existing grade), as trucks could not traverse the steep incline that would be required; (3) excavation and disposal of sufficient landfill material to place the road through the site (*i.e.*, below existing grade) would be prohibitively expensive; and (4) use of these uplands would not substantially reduce overall wetland impacts, as additional impacts would be incurred north of the Rahway River compared to the preferred alternative.

