May 12, 2022

Rick Marquis  
Division Administrator  
Federal Highway Administration  
Leo W. O’Brien Federal Building  
11A Clinton Avenue, Suite 719, Albany, NY 12207

RE: PIN 3501.60 – Final Design Report/Final Environmental Impact Statement  
Interstate 81 Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Marquis,

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Design Report (FDR)/Final Environmental Impact Statement (FEIS) prepared by the New York State Department of Transportation (NYSDOT) in cooperation with the Federal Highway Administration (FHWA) for the I-81 Viaduct Project in Syracuse, NY (the Project). Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The purpose of the Project is to address structural deficiencies and non-standard highway features while creating an improved transportation corridor through the City of Syracuse. EPA has reviewed the FDR/FEIS, focusing on the Preferred Alternative – the “Community Grid” – along with assessing any changes made since the publication of the Draft Environmental Impact Statement. Our review is consistent with EPA’s ongoing work and commitment to support local communities and reduce environmental impacts, especially those with Environmental Justice concerns per Executive Order 12898 (59 FR 7926).

EPA has served as a Cooperating Agency during the development of the FDR/FEIS and in that capacity has provided feedback to FHWA and DOT at multiple coordination points, including through participation at interagency meetings and on comments provided on prior versions of the document. This extensive coordination has resulted in the identification and resolution of many concerns raised by EPA. We acknowledge the updates on the following items:

- The inclusion of a summarized impacts and mitigation chart for each of the alternatives addressed in the FDR/FEIS in the Executive Summary. This will help community members see the potential impacts of each alternative as well as proposed mitigation.
- The relocation of the proposed roundabout from nearby the Dr. King elementary school to Van Buren Street, will minimize impacts to the children.
- The modifications and commitments made by FHWA and NYSDOT to monitor and minimize impacts to air quality and lead exposure to communities.
We would also like to provide additional comments to be considered in the Record of Decision:

- We recognize Chapter 4 (Table 4-7) addresses NYSDOT’s requirement for contractors to implement strict containment and mitigation measures, however, we recommend oversight throughout the process from the lead agency to ensure follow-through on these matters.
  - EPA has a Lead and Asthma Disparities Reduction Task force that can offer assistance to FHWA in development of these measures and plans prior to the demolition phase.
- We recommend FHWA adhere to the principles of Environmental Justice when organizing the proposed Land Use Workgroup along with ensuring accessibility to workgroup meetings by an equitable representation of the communities impacted by the proposed action and preferred alternative.
- When implementing the Lead-Based Paint education program, EPA encourages FHWA to provide materials in multiple languages to ensure accessibility and engage linguistically isolated populations.

Based on our review of the FDR/FEIS, we concur with FHWA’s assessment of environmental impacts and the proposed mitigation strategies to address these impacts throughout the design, construction, and operation of the Project. We look forward to the receipt of the Record of Decision and our future interagency collaboration on this and future FHWA-led projects in the New York Division.

Should you have any questions, please contact Arielle Benjamin, the project review lead, at (212) 637-3650 or benjamin.arielle@epa.gov.

Sincerely,

Mark Austin
Mark Austin, Team Lead
Environmental Review Team