

GERARD M. BAMBRICK
Village Administrator,
Inc. Village of Floral Park
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Good afternoon. Gerard Bambrick, 318 Carnation Avenue, Floral Park, NY. 11001. I am the Village Administrator for the Village of Floral Park. Also, I am a former Trustee of the Village and formerly I served as a member and Vice Chairman of the Nassau County Planning Commission.

Floral Park has its own unique character. Although Floral Park is within thirty minutes from Manhattan, Floral Park has managed to keep a small town feel.

I mention this not to imply that Floral Park is opposed to any and all development at Belmont Park. To the contrary, for at least a decade Floral Park has clearly and publicly advocated for a Master Plan for the development of Belmont Park that preserves and enhances Belmont Park's reputation as the premier horse racing destination in the United States, while also preserving and enhancing the character and quality of life of the communities that surround Belmont Park.

What Floral Park has opposed and still opposes are a series of disjointed development proposals that fail to take into account the development of the Belmont Park property as a whole and which ignore the impact of the cumulative effect of multiple projects on the surrounding communities.

Floral Park is deeply concerned that the environmental review of anticipated development on Belmont Park now being considered are being improperly segmented.

NYRA – the New York Racing Association – has spoken about its desire to expand operations and make improvements at Belmont for many years. Although the Empire State Development Corp has maintained to date that NYRA's plans are too speculative to include in this Environmental Review, specifics on NYRA's plans are clearly emerging.

NYRA officials have been pushing for permission to have nighttime racing at Belmont. Governor Cuomo also has declared his support for nighttime racing – to the point he included it in the State’s budget plan released in January. So the nighttime racing proposal is no longer speculation, it’s real – to the point that the specific week days for nighttime racing have been identified – Thursday through Saturdays, very likely overlapping with many events contemplated in the Islanders proposal.

This goes well beyond nighttime racing. A January 2018 BloodHorse magazine article confirms that NYRA intends on piggyback on this proposal. I’m going to quote from the article:

“NYRA president and CEO Chris Kay recently told BloodHorse that when development of the planned 18,000-seat new home of the New York Islanders begins next year, NYRA hopes to begin its own upgrades that would include lighting for night racing, renovated racing surfaces, new luxury boxes, a renovated clubhouse, and renovated grounds—including dining and entertainment options centered on the paddock area.” <https://www.bloodhorse.com/horse-racing/articles/225624/in-budget-plan-cuomo-backs-nighttime-racing-at-belmont>

Further, NYRA has been publicly advocating for permission to have Sports gambling at its racetracks. <https://www.bloodhorse.com/horse-racing/articles/225765/nyra-industry-leaders-back-sports-gambling-at-tracks>

So the Islanders and NYRA are both contemplating extensive sporting, dining and entertainment activities and improvements within the Belmont Park property, and NYRA is planning to use the Islanders project to kick start its own expanded activities and improvements.

This is not to criticize NYRA, but the impacts of its plans cannot be ignored in this environmental review. The Scoping Document already reveals that NYRA is integral to the ability to the Islanders proposal to proceed. The scope states that a shared parking agreement between the Islanders, the Financial Oversight Board (FOB) and NYRA is needed for the North and South lots. Use of one of the projects sites for the Islanders proposal also will require an amendment to NYRA's long term lease. And the Islanders needs to construct a new substation on NYRA controlled property.

NYRA's use of the property, both current and planned, is inextricably interrelated to the Islander's planned activities.

The environmental review process cannot be segmented in violation of SEQRA. In considering whether segmentation might be occurring, the several factors are considered:

- **Is there a common purpose or goal? –**

Both seek to expand sporting, dining and entertainment activities. NYRA CEO Chris Kay is reported to have stated: "One of the reasons why this is such a perfect marriage with the folks from the Islanders is that they're planning to create an entertainment district." <https://www.bloodhorse.com/horse-racing/articles/225262/nyra-plans-belmont-changes-to-target-potential-fans>

- **Is there a common geographic location?**

Clearly there is here.

- **Timing.**

Based on public statements, NYRA is looking to piggyback on the Islanders project and begin their upgrades when the Islanders begin construction of their proposed stadium.

- **Are there common impacts?**

Similar activities at the same location will cause similar impacts.

- **Overlapping ownership and control?**

The Islanders project, as proposed, cannot proceed absent the consent and cooperation of NYRA and the FOB.

- **Are any of the interrelated phases of various proposals be considered functionally dependent on each other?**

In this case, we know that the Islanders project requires the use of NYRA controlled property.

- **Does the approval of one phase or segment commit the agency to approve other phases?**

The answer to this is unclear but we already know that the Islanders project impacts the NYRA property beyond the two underdeveloped parcels, and creates conditions for NYRA to explore its own expanded activities.

- **Common plan?**

Although there is no overall plan covering both projects (**and that's part of the problem**) NYRA CEO Chris Kay has stated that they are going to have to work closely with the Islanders so that “their development and our development are integrated cohesively”.

Keep in mind that any one of these factors raises concerns over segmentation. In this case, many of the factors are triggered.

The environmental impact statement being prepared by Empire State Development must consider the cumulative impacts of this proposal and the planned activities and improvements of NYRA. We urge ESD to avoid improper segmentation. The communities surrounding Belmont Park deserve to understand and comment on the full impacts associated with future activities at Belmont Park.