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Gerard M. Bambrick
 Village Administrator
 Incorporated Village of Floral Park
 One Floral Park Boulevard
 Floral Park, NY 11001

Michael G. Murphy
 Principal
 Beveridge & Diamond PC
 477 Madison Avenue, 15th Floor
 New York, NY 10022

Re: Belmont Park Redevelopment Civic and Land Use Improvement Project
 Final Environmental Impact Statement (FEIS)
 Traffic Review Comments

Dear Messrs. Bambrick and Murphy:

As requested, NV5 has reviewed the Final Environmental Impact Statement (FEIS) for the Belmont Park Redevelopment Civic and Land Use Improvement Project, prepared by AKRF, Inc. and VHB, dated July, 2019.

NV5's review of the transportation section of the FEIS focused on trip generation, trip distribution, capacity analysis, mitigation, and parking. For ease of reference, NV5's outstanding comments on the DEIS are provided below in *italics* with any additional comments provided in regular text. Where earlier comments, such as technical items, were addressed by the FEIS, they have been omitted from the comments provided.

Trip Generation

The DEIS identifies five potential peak periods for analysis: Weekday morning (8 AM-9 AM), Weekday pre-event (7 PM-8 PM), Saturday Midday (1 PM-2 PM), Saturday pre-event (6 PM-7 PM) and Saturday post event (9 PM-10PM). The DEIS, however, did not study the weekday evening commuter peak, i.e. 5 PM-6 PM. Consistent with any EIS study of a large retail development, an analysis of the typical evening commuter peak hour is necessary as that is when background traffic is the highest.

The response to comments provided in the FEIS includes Table 22-2, which provides a comparison of anticipated project generated trips with Existing Traffic volumes on the Cross Island Parkway and Hempstead Turnpike. While Table 22-2 indicates that the combined highest volumes are for 6:30 PM-7:30 PM for a Hockey Game, this does not necessarily equate to a worst case analysis for the Cross Island Parkway or for Hempstead Avenue. If the commuter peak hour and site peak hour do not coincide, as in this case, both peak hours must be studied to determine the impact to the transportation system.

Notwithstanding the statements above, the Transportation Management Plan (TMP) identifies methodologies for shifting arrival times to arena events earlier to alleviate congestion during the Hockey Game arrival peak. This further reinforces the need for a commuter peak hour analysis. Based on the information contained in Table 22-2 the TMP is recommending that measures be implemented to add even more traffic to the commuter peak than is currently projected without providing an analysis of that information.

Trip Distribution

Based on the limited information provided in the DEIS, it appears that only 3% to 5% of the total site traffic are anticipated to utilize local roadways to access the site, even though the Cross Island Parkway (CIP) is projected to be significantly over capacity. The local analysis must be revised to consider that trips will divert off the CIP to local streets to access the site due to the unmitigated congestion on the CIP. A travel demand model and available origin-destination data (such as Streetlight Data or another 'big data' source) should be used to identify the diversion routes that will be utilized when the CIP is congested.

The FEIS' response to the comments above regarding the use of a regional model (Comment Response #11-44) does not address the comment. Notwithstanding this office's concerns with proposed mitigation measure of marking roadway 'unavailable' in Waze (details provided below) the use of a regional transportation model is even more appropriate given the plan to redirect traffic to other regional roadways in an attempt to reduce congestion on the Cross Island Parkway. A regional model is necessary to determine what routes these redirected vehicles will take and if the roadways will have the capacity available to accommodate the additional volume.

Capacity Analysis

As discussed in the trip generation section above, the DEIS fails to look at the worst case time periods for total traffic on the roadway network. Even for the time periods that were studied, the analysis in the DEIS focuses on the Cross Island Parkway (CIP) and identifies sections of the CIP that are above capacity....The DEIS does not propose improvements to the CIP to mitigate the additional congestion, nor does it consider that traffic associated with the site will divert to local roadways to avoid the congestion on the CIP. This is a major deficiency in the analysis provided.

The FEIS still does not propose improvements to the Cross Island Parkway, but anticipates that relief will be provided via the introduction of the Elmont Train Station and implementation of the measures provided in the Transportation Management Plan. While this office has concerns regarding the viability of some of the proposed mitigation measures, even if the results presented in the FEIS are taken at face value, the FEIS still identifies up to 22 highway segments of the Cross Island Parkway as well as impacts to local roadways where significant adverse traffic impacts are unmitigated.

Mitigation

The DEIS identifies locations in which mitigation is proposed throughout the study area. Almost all of this mitigation is minor timing changes to existing traffic signals. This mitigation is not credible as it is based on the assumption identified above that only 3% to 5% of the vehicles will access the site from the local street network. The mitigation plan will need to be revised once an appropriate amount of traffic is assigned to the local street network, including identifying where physical improvements are required.

Since the FEIS relies on the addition of the Elmont Train Station and the TMP for mitigation, this comment remains outstanding. The proposed minor mitigation is not credible given that the FEIS projects only a very small number of vehicles will utilize the local street network.

The DEIS also discusses a Transportation Management Plan (TMP) as a way to mitigate potential impacts. TMPs typically include operational changes that are implemented when necessary, such as police traffic control of intersections, temporary one-way streets and temporary parking restrictions. A TMP is not, however, typically a method of providing physical roadway improvements. While this office agrees that a TMP is required for this project, the TMP discussion offers no specifics and fails to identify the adverse effects triggered by the proposed TMP strategies. For example, the TMP identifies advising “background traffic...to avoid using the Cross Island Parkway near Belmont Park” (page 17-4). This strategy promotes diverting traffic from the CIP to local streets in the area, but does not provide any substantial mitigation to address this diverted traffic.

Similar to the DEIS, the FEIS fails to analyze or provide specific improvements to mitigate adverse impacts caused by the implementation of the TMP. The TMP assumes that traffic volumes on the Cross Island Parkway can be reduced by redirecting vehicles to alternative roadways, but does not provide an analysis of these alternative roadways to determine if available capacity exists or if mitigation measures are required.

The TMP discussion also identifies a traffic monitoring program which would be conducted after the project is constructed and occupied to identify potential impacts and address them accordingly. While continued monitoring of traffic conditions around the proposed project is beneficial, deferring identification and implementation of improvements until after the construction of the project is contrary to the purpose of the EIS process. Physical improvements can take years to progress through design, property acquisition, and construction, during which time the impacts go unmitigated. Impacts associated with the proposed development must be identified prior to the construction of the project and mitigation measures implemented prior to opening of the project.

The FEIS also identifies that a traffic monitoring will be implemented as part of the TMP, but still does not identify the locations to be monitored or the methodology for implementing physical improvements as a result of the project if they are identified through a future monitoring program. The FEIS should identify anticipated improvements so they can be implemented prior to the opening of the project.

The DEIS identified the use of the Belmont Train Station for major events, but did not consider full time use of the Belmont Train Station as a method to mitigate traffic impacts. This should be considered as it will not only reduce the number of vehicles accessing the site, but also minimize the need for ‘last mile’ connections from the adjacent train stations, such as Floral Park, which add to the traffic on local streets within the village. Full use of the Belmont Station may not even be sufficient, as travelers from eastern Long Island may use Floral Park or other stations instead of routing through Jamaica Station to use Belmont Station.

In lieu of full time use of the Belmont Station, the FEIS identifies a new rail Station at Elmont. While this will likely shift some patrons of the proposed project from personal vehicles to mass transit, a thorough assessment of the environmental impacts of a rail station at Elmont, including, as discussed below, transportation and traffic impact, have not been included in the FEIS. A supplemental EIS or revised Draft EIS should be prepared to detail the impacts associated with such a major project in the area, and to provide the public with a meaningful opportunity to review and comment on this significant project component.

The DEIS identifies a number of locations which are above capacity and mitigation is considered infeasible. The DEIS fails to consider a mitigation alternative where the intensity of the development is reduced, such as reducing or eliminating components of the project.

The FEIS includes a ‘no retail’ alternative in an attempt to address this comment. The ‘no retail’ analysis provided, however is incomplete as it does not include any of the traffic mitigation measures identified for the primary proposal. In many locations, the ‘no retail’ alternative identifies worse impacts than the proposed project, which is counterintuitive since reducing the intensity of the project should not increase the impacts.

Effect on Emergency Response Times

Page 11-72 of the DEIS discusses that “emergency vehicles...can maneuver around and through congested areas...because they are not bound by standard traffic controls.” Plainfield Avenue serves as a major response route for the Floral Park Fire Department. Since Plainfield Avenue is one lane in each direction with minimal shoulders, the amount of congestion on this route directly influences the ability of emergency response.

The concern raised above regarding emergency response times is only exacerbated by the proposed TMP recommendation to mark Plainfield Avenue as ‘unavailable’ during events. Emergency services will be restricted from utilizing app based direction applications if the roadways are identified as closed.

Plainfield Avenue & Tulip Avenue

There is a discrepancy between the automatic traffic recorder (ATR) and intersection turning movement count data provided for this intersection. For example the ATR data shows an average of 500 vehicles approaching the intersection westbound during the weekday morning peak hour, whereas the analysis uses 375 vehicles. Similarly, the northbound ATR data shows an average of 426 vehicles during the morning peak hour, but only 254 are used in the analysis. This indicates that more vehicles approach the intersection than are being processed by the signal, and the DEIS does not account for this discrepancy.

Furthermore, the existing levels of service presented in the DEIS are not consistent with field observations conducted by NV5 in November 2018. NV5 staff observed approaches to the signal routinely queuing to where the intersection did not clear, i.e. vehicles were not able to pass through the intersection during the green phase of the signal due to congestion downstream. The additional delay caused by this situation is commonly referred to the d3 component of delay. The analysis provided in the DEIS does not appear to make any adjustments to the intersection volumes to account for 'd3' delay. This results in the calculated levels of service being better than actual conditions, and underestimates the impact of the proposed project on this intersection.

The November 5, 2018 Covert Avenue Crossing Construction Detour Plan prepared by Stantec Consulting Services, Inc also includes analysis of the intersection of Plainfield Avenue & Tulip Avenue, and further confirms this deficiency in the DEIS. The Stantec analysis shows an 'F' level of service for the southbound approach to the intersection during the existing condition evening peak hour whereas the DEIS indicates a 'D' level of service.

Plainfield Avenue & Magnolia Avenue

Similar to the intersection of Plainfield Avenue & Tulip Avenue identified above, the existing levels of service presented in the DEIS are not consistent with field observations conducted by NV5 in November 2018. The analysis provided in the DEIS does not appear to make any adjustments to the intersection volumes to account for 'd3' delay. This results in the calculated levels of service being better than actual conditions, and underestimates the impact of the proposed project on this intersection.

FEIS Response 11-99 indicates that the queuing identified above occurs during the commuter peak hour and not during the Arena peak hour for the intersections referenced above, and thus cannot be used as a direct comparison. While this may be the case, this reinforces the fact that a commuter peak hour analysis is necessary, as the congestion identified during the commuter peak hour was not considered in the analysis performed in the FEIS.

Additional Comments on the FEIS

New Measures Introduced in the FEIS

The FEIS introduces two major mitigation measures that were not provided in the DEIS: the construction of the Elmont Rail Station and the presentation of a Traffic Management Plan (TMP). While both of these measures will likely reduce automobile trips associated with the project, by presenting them only in the FEIS, the public was not given the opportunity to review or comment on them. By introducing these measures only after the end of the public comment period, the review process is being circumvented.

Proposed Mitigation is still Insufficient

Even if one accepts that all the mitigation measures identified in the FEIS are correct, the project still has unmitigated traffic impacts on up to 22 highway segments of the Cross Island Parkway as well as impacts to local roadways. If improvements cannot be made to mitigate project impacts, the size and scope of the project should be reduced to minimize and/or eliminate the unmitigated impacts.

Additional Issues Identified with the FEIS

No Retail Alternative

The ‘No Retail Alternative’ was not provided in the DEIS, and therefore the public did not have the opportunity to review or comment on it. The FEIS states on page 16-4 that “With respect to operational traffic and construction traffic...the No Retail Village would lessen, but not eliminate those impacts.” The FEIS acknowledges that the No Retail Alternative reduces traffic impacts as a result of the project but discounts it only because it doesn’t match the goals of the project sponsors.

A comparison of the traffic analysis results presented for the “Build with Mitigation” alternative to the “No Retail” alternative indicates that the “No Retail” alternative is worse than the “Build with Mitigation” alternative. It appears that the TMP measures discussed in the FEIS were not applied to the “No Retail” analysis. The same TMP measures must be applied under both scenarios to provide an accurate comparison and identify if the “No Retail” alternative is a better option. This information is simply not provided, rendering the FEIS’s conclusions regarding the “No Retail” option meaningless. These types of issues are precisely why the ‘No Retail Alternative’ should have been included in a supplemental EIS subject to public review and comment.

Elmont Station

A detailed analysis of the changes on the transportation network associated with the creation of an Elmont train station were not analyzed or reviewed. The presumption that commuter based ridership will not increase as a result of the additional station is unsubstantiated. Parking at many stations along the LIRR is severely constrained. Any commuters which transfer to the new Elmont Station will likely be replaced by other commuters who currently avoid using stations due to parking constraints. A detailed analysis is necessary to determine the impacts of a new station on the roadway and rail networks.

TMP Measures

“Use Alternate Route”

One of the mitigation measures identified in the TMP is to advise drivers of pending events at the arena and encourage them to seek alternate routes to the CIP. The TMP optimistically anticipates up to 10% of the existing traffic on the CIP is anticipated to be rerouted by these measures. An analysis of the alternative routes (such as the Northern State and Meadowbrook State Parkways) was not completed and it is unknown if these routes have the available capacity to accept the additional volume. Without a traffic analysis of the proposed alternative routes, it is unknown if this TMP is improving conditions or merely moving the problem to other roadways.

Furthermore, directing motorists to ‘use alternate route’ does not only encourage drivers to utilize other highways and parkways, it also encourages the use of local streets as alternate routes, which would likely create additional unmitigated impacts on local roadways in the area.

Make Roads ‘Unavailable’ using apps

The TMP identifies working with ‘Waze’ or other direction based applications to mark certain roadways, such as Plainfield Avenue, unavailable during events to discourage patrons from using them. A number of problems are apparent with this strategy:

- There is no precedent that Waze or any other direction based application will agree to voluntarily identify public roads as closed even though they are still open to traffic.
- Identifying these roads as closed will impact local residents as they will no longer be able to rely on navigation apps to travel to their homes and businesses.
- Inaccurate information discourages use of direction based applications, which will cause drivers to move to other applications over time.

Drivers utilizing different applications from ‘Waze’ will still be directed to local roadways, cancelling out any benefit made by this strategy.

Community Cost of the participating in the TMP

The FEIS identifies local jurisdictions to take part in the traffic management process identified in the TMP but makes no reference on how the Villages will fund such involvement. Many of the villages do not have on staff traffic experts and would need to retain outside consultants to fund such ongoing involvement.

Lack of a Traffic Monitoring Plan

The FEIS, even with the TMP, states that locations for a traffic monitoring plan will be developed in the future. It is not possible for the Villages to comment on the locations which should be monitored for traffic impacts are if they have not yet been developed.

I trust that this information assists the Village as they review the FEIS for this project. As additional information becomes available, additional comments will be provided as appropriate. If you have any questions on this matter, please feel free to contact me at 973-946-5604 or via email at Joseph.Fishinger@NV5.com.

Sincerely,
NV5



Joseph A. Fishinger, Jr, PE, PTOE
Director, Traffic Engineering