

**Belmont Development
Public Hearing Jan 8, 2019
Comments by Frank Gunther, Floral Park resident**

Transportation

- Many of the CIP highway segments operate at congested or near-congested conditions in at least one direction during peak periods under existing conditions.
- Even with the proposed series of transportation demand management measures in place, it is expected that there would still be some highway segments where the TMP would not be sufficient to fully mitigate significant adverse traffic impacts. However... the TMP would, if necessary, be refined during the proposed project's operations as real time information becomes available.
- Potential for Traffic Diversions:
 - "certain routes in the vicinity of the traffic study area may be susceptible to traffic diversions by drivers using mobile navigation apps with real time data to avoid congestion, or by other motorists with a high degree of familiarity with the local street network." (*Acknowledgement that Floral Park will have problems; but does not provide a solution until it is realized after the fact.*)

Mitigation

- The DEIS identifies two mitigation approaches:
 1. Adjustments to existing traffic controls: for example signals, traffic enforcement agents before or after events, turn prohibitions, geometric improvements to intersections (e.g. re-striping, new lane designations, etc).
 - a. This mitigation is *based on the assumption identified above that only 3% to 5% of the vehicles will access the site from the local street network*.
 - b. This is inaccurate. *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.*
 2. Transportation Management Plan (TMP) as a way to mitigate potential impacts.
 - a. *Transportation demand measures* (e.g. carpooling and incentives to use mass transit)
 - b. *Operational strategies* (e.g. management of parking facility utilization and communication of event day transportation conditions). The goal is to reduce volume of project-generated traffic and redistributing traffic away from peak arrival and departure hours.

Failure of the proposed Mitigation Plan

- While a TMP is required for this project, ***the TMP identified in the DEIS 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.***
- ***The TMP 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 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.