

Francis C. Gunther, A.I.A.
Architect
66 Beech Street
Floral Park, New York, 11001
(516) 437-6462
fgunther66@gmail.com

August 1, 2019

Empire State Development
633 Third Avenue
New York, NY 10017

Att: Michael Avolio

Via email: belmontoutreach@esd.ny.gov

Re: Belmont Park Redevelopment Project
Final Environmental Impact Statement

Dear Mr. Avolio:

I am writing as an active resident of the Village of Floral Park and as Chairman of the Village's Architectural Review Board. I am a member of the Mayor's Task Force reviewing the proposed Belmont project and have participated in presentations made by ESD including the July Board meeting held in your offices.

It is premature and unconscionable for ESD to accept the FEIS for several very important reasons, particularly as relate to Chapters 11 (Transportation) and 17 (Mitigation). In spite of the six months since DEIS comments were given to ESD, the FEIS presents itself as hastily pulled together, incomplete and devoid of key data essential for thorough review and implementation of the project. Following are my comments and questions pertaining to these two chapters.

Chapter 11

Page	Comment
General	Virtually no substantive or quantitative changes to transportation analyses have been identified thru the entire chapter. Why have the DEIS comments not been reflected and incorporated?
General	There appear to be absolutely minimal changes to the detailed data Tables in the chapter.
General	Conflicting and inconsistent information appears in the FEIS, both text and maps, regarding the location of "Belmont Park Road." Is it hugging the fence separating Belmont Park from Floral Park or is it south of Hempstead Tpke or both? This confusion is compounded by referenced identification of the Red Road that differ from the DEIS. See comment below regarding page 11-91.
11-2	Bus service "adverse impact" has been reduced to the more limiting time of "...after <u>sold-out</u> games," unfairly limiting the quantification of traffic impacts on the neighboring community.
11-7	Table 11-6 Traffic analysis periods have not been expanded to include evening rush out traffic in spite of numerous input Floral Park provided at the DEIS. Why not?
11-10	Trip distribution and assignment: no change identified from the DEIS. How can this be possible given the addition of the LIRR Elmont station?

11-56	Regarding potential impacts of the proposed action: no adjustment has been identified to traffic along the Red Road between the new Elmont LIRR station and the arena entrance. a. At a minimum, shuttle bus traffic mentioned elsewhere in FEIS would affect significantly affect circulation on this road. b. There is no mention of Belmont Park Road running along the border between the North parking and the VFP boundary
11-57	Parking Facilities regarding the North lot: there is no mention of the parking for the new Elmont LIRR station and its impact on this part of the site.
11-62	Trucks and buses: all trucks and buses exiting from the retail village would use Gate 14 to travel eastbound along Hempstead Tpke (not on the CIP) a. how would these vehicles travel north without using Plainfield Ave.? b. If wishing to go west, all trucks would be required to make a U turn on Hempstead Tpke; this is unreasonable and unsafe.
11-62	Trucks and buses traveling to the site from the east would need to make a U turn in Queens to reach the entrance to the retail site. Likewise this is unreasonable and unsafe. Trucks higher than 9'-3" could not use the Hampstead Tpke underpass, necessitating traveling on local roads.
11-63	There is no identified change to projected traffic on Plainfield Ave; this is unresponsive to the DEIS critique comments identifying the need to update peak projected travel loads..
11-64	Table 11-28 "With action weekday traffic levels" have been modified at the Plainfield / Jericho and Plainfield / Carnation intersections (AM Peak Hour changed to 43.7 and 21 respectively). This is not believable given the legal inability for Waze and other apps to divert traffic away from these roads when in fact they are neither closed nor able to be closed without permission form NYS.
11-69	I seriously question the "key findings of the traffic level of service" which indicate a very minimal number of increases in traffic movements when one considers the bus and truck traffic impacts from Project operations as well as during the construction period. No change is flagged to the DEIS listing of the six adversely affected traffic intersections. Why is this acceptable?
11-71	Potential for Traffic Diversions to Local Streets: no identified changes other than the weak reference in the Mitigation TMP to real time communication with Waze and other apps.
11-80	"Chapter 17 Mitigation Measures identifies and evaluates measures to improve overall highway network conditions... that would most benefit key segments of the Cross island Parkway..." What about local streets?
11-82	LIRR Service: no identified changes since the DEIS. LIRR patrons remain at 125 and 7%. Why does this not address the impacts of the new Elmont LIRR station?
11-85	"...There will be no changes to the amount of parking on the... East lot. Overall the Proposed Project would result in a net reduction of approximately 1,965 parking on the Project sites..." Table 11-38 quantifies reductions by location that unfairly affect VFP; with a net reduction of 1,080 at Site B and 745 at Site A; however only 140 spaces at the North lot are re-designated for the LIRR Elmont station. This does not add up to a responsible plan.
11-85	Reference to possible night racing remains in the text; this could result in higher nighttime parking.
11-91	Passengers traveling from the LIRR Elmont station would "cross the Red Road to reach the plaza on the north side of the arena... The Red Road would be closed to general traffic during, before and after arena events..." During these periods it is unclear what path passenger cars will take: will they be re-directed toward the east? How is this workable? Please provide supportive site plans.

Chapter 17

Page	Comment
17-1	As the Elmont LIRR station will be constructed in two phases, patrons traveling by LIRR from the east will not have access to the Project site until at least 2023 – probably later, as the second half will be deferred until after completion of the Third Rail project. a. This will be disruptive to VFP in the interim. b. Why is this not included in Traffic impacts to the adjacent communities? c. Where is the plan to address this?
17-2	The TMP will “partner” with navigation apps providers (e.g. Waze) to define local streets that could be designated as “unavailable” to thru traffic during arrival and departure times. a. Plainfield Ave, Tulip Ave and Jericho Tpke are state roads. Accordingly, how would the Village of Floral Park have the ability to protect its community from traffic overload? b. This is especially onerous with Plainfield Ave which bisects Floral Park. c. Others have commented to the illegality of assuming Waze and other apps have the ability to direct traffic away from these roads. In general, the FEIS has failed to solve the impending traffic morass via its faulty Mitigation plan.
17-3	This section identifies “unmitigated impacts” on certain streets/intersections. a. Why is this acceptable? b. Why is the FEIS preceding NYC’s traffic analysis?
17-4	This section states that the new LIRR Elmont station “will be used by up to 30% and 24% of the arena patrons.” a. How sound is this conclusion? Where is the back up? b. New shuttle bus services from Rockville Center: will these buses use local streets?
17-5	New shuttle bus service between the new Elmont station and the arena (3/4 mile away). Please provide quantification of number of buses, emissions and environmental impact on Floral Park. This information is missing from the FEIS.
17-6	“Construction transportation impacts” incorrectly state the time of maximum PM adverse impacts at 5:15 to 6:15 PM. Most construction staff depart work at 3:00 PM, coincidental with peak school bus traffic. a. Why is this not addressed? b. Where is the quantification of the voluminous construction-related traffic, especially trucks, in support of this 10,000 construction jobs project?
17-7	The analysis of the effect of the new Elmont LIRR station finds it would <u>not</u> result in adverse impacts to land use, zoning and community character, community facilities and utilities... a. Where is the back up for this statement? b. This additional project should generate the need for a separate DEIS.
Fig 17-1	Clarify vehicular traffic routes to the new Elmont LIRR station. What traffic will circulate from Plainfield Ave across Belmont Park Road? The FEIS does not show this.
17-8	Transportation analyses are based only upon the completion of the new LIRR Elmont station. What about the 2 year minimum interim period?
17-10	The TMP and the “transportation manager”: a. What role and authority will the Village of Floral Park have in managing this activity? b. Is the Village of Floral Park among the “stakeholders” c. How are traffic mitigation decisions regarding Plainfield Ave and other parallel VFP streets made in light of the State ownership of Plainfield Ave.?
17-11	The listing of alternate routes to the CIP, namely the Meadowbrook and Wantagh Pkwy and the Seaford Oyster Bays Expressway, is not credible. Similarly, the east-west parkways are not directly relevant with regard to local street traffic.. a. Where are details identifying “alternate streets/roads?” b. The statement that the TMP demand strategy would divert 10% and 5% of CIP traffic is not supported by detail.

	c. In general this portion of the Mitigation fails to solve the problems identified.
17-14	Shuttle buses: Please provide back-up data on the cumulative magnitude of all these buses on the nearby communities.
17-15	Who will pay for the TMP and for what duration? How can it be believable to come to meaningful conclusions / directives given its seemingly oversized management structure? How will its directions be enforced? What penalties accrue when it fails?
Table 17-4	The message here that "all will be well" since the referenced intersections are "mitigated?" That is not supported by facts.
17-21,22	None of these Mitigation measures address the traffic related to the time of the 10,000 job construction phase.
17-24	The potential for traffic diversions to local streets: Why is the FEIS rushed to publication ahead of the separate studies underway by both the City of New York AND THE Town of Hempstead? Without benefit of information provided by these entities, the FEIS seems to be farcical! Please be receptive also to information from the Village of Floral Park's traffic consultant. This is especially alarming given the description of TMP strategies described in this chapter.
17-33	Regarding interim Conditions pending the completion of the Elmont LIRR station in 2023 or more probably later: a. What is the proposed path of the shuttle buses and other NICE buses from other LIRR stations? b. Is the Floral Park station one of the proposed shuttle bus departure points? c. If not, what protects the Village of Floral Park from it being so designated in the future? The FEIS fails to address the impact, especially of pollution and traffic.
17-34	The text says that the LIRR is estimated to be used by 18% and 12% of arena patrons. Further on it states that driving by auto in the interim period is estimated at 57% and 67% of . a. Where is all this backed up? b. Do the NYC, Town of Hempstead and Village of Floral Park traffic consultants concur? c. This analysis is missing..
17-36	"Construction Transportation (Traffic)" misstates heavy traffic times for construction personnel who typically depart at 3:00 PM. Will the TMP in place to monitor this 10,000 jobs traffic?
17-38	Specifically, what is the TMP's "proactive approach" to preventing off-site parking?
17-39	How does the new Elmont LIRR station remove vehicle trips from the local roadway network during construction?
17-44	Construction of the LIRR Elmont station is "anticipated to generate only a relatively modest increase in construction related vehicle trips" How is this quantified?

ESD would be derelict in not taking the time or care to address all relevant issues impacting the neighboring communities prior to permitting construction to commence rather than rushing ahead with an incomplete and questionable report, the consequences of which will irreparably harm all of us. Please delay approval of the FEIS until the analyses are complete.

Yours truly,



Francis Gunther, AIA

Cc: Hon Dominick Longobardi
Hon. Kevin Fitzgerald
Gerard Bambrick