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July 18, 2024

Via First Class Mail and via comments portal at:
new.mta.info/project/queens-bus-network-redesign

MTA New York City Transit
Government and Community Relations
2 Broadway
New York, NY 10004

Re: Comments/Objection of the Incorporated Village of Floral Park to the MTA's Queens Bus Network Redesign Proposed Final Plan

We thank the representatives from the Metropolitan Transportation Authority (the MTA¹) for reaching out to the Incorporated Village of Floral Park (the "Village") recently to discuss the MTA's Queens Bus Network Redesign Proposed Final Plan, dated December 12, 2023 (the "PFP").

The focus of the Village's comments during that TEAMS conference call on June 5, 2024 (the "June 5th TEAMS Conference") related to the MTA's inclusion for the first time in the PFP of a proposal to extend the new Q110 bus route to the Floral Park Long Island Rail Road ("LIRR") train station (the "Floral Park Station"). The prior iterations of the Queens Bus Network Redesign plans¹ never included or suggested an extension of any bus routes over the Queens/Nassau border and through the streets of Floral Park. As made clear during that conference call, the Village strongly objects to the Q110 being routed into the Village. The Village's numerous questions, comments and concerns are set forth in the attached "**Comments/Objection of the Incorporated Village of Floral Park to the MTA's Queens Bus Network Redesign Proposed Final Plan.**" Below is a summary of the Village's objections to the PFP. In sum, the very real negative impacts of this proposal greatly outweigh any perceived potential benefit.

The proposed expansion of this route into Floral Park is as follows: from Jericho Turnpike to southbound along Carnation Avenue to Caroline Place, then east along Caroline Place to the Floral Park Station and then a left to turn north on to Tulip Avenue to return to Jericho Turnpike (the "Proposed Carnation/Caroline/Tulip Loop"). See PFP at page 389.

¹ The December 2019 Queens Bus Network Redesign Draft Plan (<https://new.mta.info/document/12701>) (the "December 2019 Draft Plan") and the March 2022 Queens Bus Network Redesign New Draft Plan (<https://new.mta.info/document/87471>) (the "March 2022 New Draft Plan") did not include the extension of any bus routes into the Village of Floral Park. See December 2019 Draft Plan at pages 31 and 32 and March 2022 New Draft Plan at page 35.

This proposed extension of the new Q110's new route would, among other problems, exacerbate already existing traffic congestion along Carnation Avenue and Tulip Avenue, especially during the early morning and evening commutes. This fact alone would violate one of the stated key objectives of the PFP, which is to improve bus speeds and service reliability by avoiding traffic congestion "choke points". PFP at pages 10-11, 20. Yet, more significantly, increasing the traffic congestion in this area will impede the ability of the Village's first responder police, fire and ambulance services to access a section of the Village.

The fact that the proposed Carnation/Caroline/Tulip Loop is problematic is also evidenced by the fact that the MTA stated during our June 5th TEAMS Conference that it was exploring an alternative route even before receiving the Village's feedback to the Proposed Carnation/Caroline/Tulip Loop. This proposed alternative, which is not reflected or discussed in the PFP, is as follows: a right turn from Jericho Turnpike onto Tulip Avenue heading south, then a left turn onto South Tyson Avenue heading east, then a left turn onto South Tyson Avenue heading north and then a left turn onto Jericho Turnpike heading west (the "South Tyson Alternative").

However, the proposed South Tyson Alternative that is apparently under consideration is even more problematic than the Carnation/Caroline/Tulip Loop for several reasons. The most significant of these reasons is that the John Lewis Childs Elementary School (the "JLC School") (Pre- K to 6th Grade) is located on South Tyson Avenue. South Tyson Avenue in the vicinity of the JLC School already has school bus arrivals and departures, and parents in cars dropping off and picking up young students. All of this is in addition to heavy commuter traffic along South Tyson Avenue in this area as well. Adding commuter bus traffic around the area of the JLC School would create an unacceptably dangerous condition.

Balanced against these very real negative impacts are scant benefits from this proposal. It is extremely unlikely that extending the Q110 route to the Floral Park Station will facilitate any bus commuters' connection to LIRR service. This is because the Q110's new route along Jericho Turnpike closely parallels the LIRR Hempstead Line. For any potential Q110 bus rider who would be looking to catch the bus along Jericho Turnpike to the east of the Cross Island Parkway, the distance between any potential Q110 bus stops along Jericho Turnpike would be a very walkable distance to the LIRR Hempstead line stations of Bellerose or UBS/Elmont. Very few commuters would board a bus to go east to connect to a LIRR train at the Floral Park Station only to head back west, when they can catch the same train on the Hempstead line further west. To do otherwise would add time and expense to each commuter's trip. Similarly, for any potential Q110 commuter who would catch the bus on Jericho Turnpike to the west of the Cross Island Parkway, it would be much quicker to take the bus west to the Queens Village LIRR Station rather than travelling east to the Floral Park Station.

Further, during the June 5th TEAMS Conference, there were also a number of unanswered questions and the Village was left with a number of significant concerns that were not addressed. Many of these question and concerns are in addition to the problematic nature of the proposals discussed above, and they are set forth in the attached **"Comments/Objection of the Incorporated Village of Floral Park to the MTA's Queens Bus Network Redesign Proposed Final Plan."**

Therefore, again, the Village strongly objects to the proposal and urges the MTA to focus its resources on the other laudable objectives of the Bus Network Redesign Project and to omit this proposal from its Final Bus Redesign Plan.

Thank you for your consideration in this matter and we welcome continuing ongoing dialogue to ensure the residents of Floral Park, its businesses and neighbors are not adversely affected by this proposal.

Sincerely,

Kevin M. Fitzgerald

Kevin M. Fitzgerald
Mayor

**Comments/Objection of the Incorporated Village of Floral Park to the
MTA's Queens Bus Network Redesign Proposed Final Plan**

July 18, 2024

Introduction/Objection : The sole comment/objection of the Incorporated Village of Floral Park (the "Village") to the MTA's Queens Bus Network Redesign Proposed MTA's Queens Bus Network Redesign Proposed Final Plan, dated December 12, 2023 (<https://new.mta.info/document/128476>) (the "PFP") is to the recently added proposal to extend the new route of the Q110 through the streets of the Village to make the Q110's final stop the Floral Park Long Island Rail Road Station (the "FP Station"). See PFP at page 388.

The Village submits these comments and objection at this time because until very recently the Village was not aware of the proposal to the extend the route of the Q110 through the streets of the Village. The proposal to extend the route of the Q110 through the streets of the Village was first made public in the Queens Bus Network Redesign Proposed Final Plan dated December 12, 2023. The proposed expansion of this route into Floral Park is as follows: from Jericho Turnpike to southbound along Carnation Avenue to Caroline Place, then east along Caroline Place to the Floral Park Station and then a left to turn north on to Tulip Avenue to return to Jericho Turnpike (the "Proposed Carnation/Caroline/Tulip Loop"). See PFP at page 388. Although the MTA's Queens Bus Network Redesign Project has been in progress since 2019, the prior iterations of the plan - -the December 2019 Queens Bus Network Redesign Draft Plan (<https://new.mta.info/document/12701>) (the "December 2019 Draft Plan") and the March 2022 Queens Bus Network Redesign New Draft Plan (<https://new.mta.info/document/87471>) (the "March 2022 New Draft Plan") did not include the extension of any bus routes into the Village of Floral Park. See December 2019 Draft Plan at pages 31 and 32 and March 2022 New Draft Plan at page 35.

The Village appreciates the outreach of the MTA/LIRR to alert the Village to this proposal in late May 2024 and for arranging a TEAMS conference call with certain members of the MTA Queens Bus Network Redesign group on June 5, 2024 (the “June 5th TEAMS Conference”). During the June 5th TEAMS Conference, the Village was informed that yet another alternative route for the Q110 through the Village was being considered by the MTA because of the MTA’s concerns about the Proposed Carnation/Caroline/Tulip Loop currently in the PFP. See PFP at page 389. This alternate route is as follows: a right turn from Jericho Turnpike onto Tulip Avenue heading south, then a left turn onto South Tyson Avenue heading east, then a left turn onto South Tyson Avenue heading north and then a left turn onto Jericho Turnpike heading west (the “Proposed South Tyson Alternative”). As expressed by the Village during the June 5th TEAMS Conference, and as explained below, the Proposed South Tyson Alternative is even more problematic and dangerous than the Proposed Carnation/Caroline/Tulip Loop.

The Village understands that a massive project such as the Queens Bus Network Redesign is a process. The Village is heartened by the MTA’s statement in the PFP regarding the modifications to prior iterations of the Plan that “[w]e’ve carried over certain well-received proposals and withdrawn those that were **problematic.**” PFP at page 19. As previously stated by the Village and as set forth below, any perceived benefit of extending the route of the Q110 into the Village is greatly outweighed by the negative impacts of this proposal. Therefore, the Village requests that, as with other problematic proposals that were considered but rejected as part of this process, that the proposal to extend the route of the Q110 into the Village be withdrawn and not included in the Final Plan.

A: **THE VILLAGE OF FLORAL PARK - - NASSAU COUNTY**

The Village of Floral Park is entirely situated in **Nassau County**. As such, it would appear to be outside the scope of the “**Queens** Bus Network Redesign.” A review of the existing bus routes and the “Proposed Local Bus Network” under the PFP reflects that in nearly all instances the MTA buses terminate within the NYC borders. See PFP at page 39. Further, the Village of Floral Park is clearly well outside the NYC Department of Transportation (“NYC DOT”) Queens Bus Priority Corridors. See PFP at page 26 (map of NYC DOT Queens Bus Priority Corridors). This may explain why any proposal to extend a bus route through the Village was omitted from prior study and all prior iterations of the Queens Bus Network Redesign Plans. This may also explain why there does not appear to be any traffic studies or data to support this proposal.

The Village of Floral Park has an area of less than two square miles and is completely bisected by the railroad tracks along the right of way of the Metropolitan Transit Authority (“MTA”) and the Long Island Rail Road (“LIRR”). Along with service from the LIRR, Floral Park residents and surrounding communities are currently serviced by the Nassau Inter-County Express (“NICE”) N26 and MTA’s Q36 bus routes.

The Village of Floral Park is a full-service Village which provides many services to its residents. These services include essential and life-saving Police, Fire and Ambulance services. To provide these essential services to our residents, our first responders must use the Village’s roads. In some instances, this is complicated by the fact that the Village is bisected by the Long Island Rail Road. In many instances, the physical barrier posed by the LIRR tracks makes access to certain sections of the Village limited. One example of this is the northwest section of the Village (the area of the Village west of Carnation Avenue which is bounded by the LIRR tracks to the south). Although there are many blocks in the Village to the south of this northwest section, the LIRR tracks cut off access to this section from the south. The quickest and most direct route for first responder stationed to

the south of the LIRR tracks to the northwest section of Village is from the side- streets off of Carnation Avenue (Adelaide Street and Florence Street).

B: NEGATIVE IMPACTS FROM THE PROPOSED EXTENSION OF THE Q110 INTO FLORAL PARK AS CONTAINED IN THE PROPOSED FINAL PLAN

- The concerns with regard to the Proposed Carnation/Caroline/Tulip Loop are:
 - Carnation Avenue is a narrow two-way north/ south roadway that has significant volume with particular increases during the morning (north) and evening rush hours.
 - Was a traffic study conducted by the MTA (especially during the morning and evening rush hours) analyzing the traffic impacts from buses making left hand turns on to Caroline Place?
 - During the June 5th TEAMS Conference, it was alluded to that the MTA ran test buses on Carnation Avenue and deemed it not acceptable for the MTA's uses. Can we obtain the reasons why the MTA made that determination?

C: NEGATIVE IMPACTS FROM THE SUGGESTED ALTERNATIVE TO UTILIZE SOUTH TYSON AVENUE

The fact that the proposed Carnation/Caroline/Tulip Loop is problematic is evidenced by the fact that the MTA stated during our June 5th TEAMS Conference that it is exploring an alternative route that would avoid Carnation Avenue and would utilize the South Tyson Avenue instead. Although the South Tyson Alternative avoids certain of the problems with Proposed Carnation/Caroline/Tulip Loop, it creates many other problems, which are perhaps worse and are in fact dangerous.

- The intersection of South Tyson Avenue and Elizabeth Street is the home to the John Lewis Childs Elementary School (the “JLC School”) (Pre-K to 6th Grade).
- South Tyson Avenue is a heavily trafficked road with in excess of 200 cars during the peak periods - which are typically the start and end of the school day - with parents dropping off and picking up young students. This is in addition to school buses dropping off and picking up students.
- Due to these conditions, there is a need for a school crossing guard along with various stop signs that have been required.
- Was a traffic study conducted by the MTA (especially during the morning and evening rush hours) analyzing the traffic impacts from buses making left hand turns on to South Tyson Avenue from Tulip Avenue?

D: OPERATIONAL CONCERNS

There is no indication in either the Proposed Final Plan or during the June 5th TEAMS Conference of the exact placement of the bus stops. The following would be some of our initial concerns (note: we may have additional depending on where the stop would be placed).

If using the Proposed Carnation/Caroline/Tulip Loop as reflected in the PFP:

- As Caroline Place has a narrow east bound lane it is possible that the bus could back up traffic. A stopped bus along Caroline Place could impact first responders’ ability to traverse that road during emergencies.
- There are multiple exits for the existing commuter parking lot which would not be able to be blocked. If those were to be blocked it would eliminate valuable spaces used by LIRR commuters.
- There are a number of crosswalks at the station directly in front of the waiting area and elevators which would prevent the bus from stopping directly at the station.

If using the Proposed South Tyson Alternative, there are multiple operational concerns. However, the Village has only had this alternative verbally explained to it during the June 5th Teams Conference, and

there have been no diagrams or other information provided by the MTA indicating relevant facts such as proposed bus stop locations. Based on what we know, however, it is assumed that under the South Tyson Alternative, the site of a proposed bus stop would be on the first block on South Tyson Avenue which is parallel the Floral Park Station. Based on this assumption, the concerns are:

- There are four village owned parking spaces on the south side of South Tyson Avenue which provide much needed relief for parking in the business district and could not be used for a bus stop.
- The aforementioned spaces may be in the path of a bus turning radius. Has this been considered?
- To the east of these four parking spaces, the balance of the street on the south side of South Tyson Avenue parallel to the Floral Park Station are entrances and exits to for the existing commuter parking lot. If this area were to be blocked by buses or a bus stop, it would eliminate valuable spaces used by LIRR commuters.
- There would be no direct handicap access to the Floral Park Station if the bus stop under the South Tyson Alternative were located on South Tyson Avenue. Anyone exiting a bus from South Tyson Avenue who needed to use the elevators at the Floral Park Station would be required to cross the busy intersection of Tulip Avenue and South Tyson Avenue.

There are also many operational concerns that apply to either proposed route:

- Will the Floral Park Train station be opened 24 hours a day? If it were to be, will there be a constant MTA Police presence there as the Floral Park Police Department (and in turn the taxpayers of the Village) should not bear the financial and time responsibilities of policing the area for a service that was not requested and which is not needed by its residents
- During snow storms the Village's Department of Public Works ("DPW") is responsible for plowing all of the Village roads including Carnation Avenue and South Tyson Avenue and Caroline Place. There is a process in which roads are prioritized to ensure emergency services can operate without interruption. The DPW staff can not prioritize roads such as Caroline Place. Additionally, we are concerned that buses

(which are heavier than currently existing traffic on those streets) running over unplowed roads will compact the snow to make plowing harder when those roads are plowed.

E: THERE IS NO APPRECIABLE BENEFIT TO BUS COMMUTERS FROM THIS PROPOSAL

- The Q110 route is duplicative of the LIRR which runs parallel to the proposed route.
- Why would a patron get on the bus heading east or west at any stop when they can use the following train stations: Hollis, Queens Village, Elmont/UBS Arena and Bellerose Village?
- The proposed bus schedule of every half hour is almost the same as the existing LIRR schedules between those stations.
- The Q110 route is duplicative of the NICE N26 route east of Hollis and the N26 runs along Jericho Turnpike to New Hyde Park, Garden City, Mineola and ending at the Roosevelt Field Mall thus serving a significantly large population. Additionally, the frequency is similar to the proposed Q110.
- What is the reason (and is there any quantitative data) that supports having a new bus line run parallel to the LIRR and duplicative of other bus routes?
- As the proposed route was not in any of the previous iterations of the Queens Bus Network Redesign Project, what has changed to necessitate its inclusion?

**F: THE PROPOSAL IS CONTRARY TO KEY OBJECTIVES OF THE
MTA'S QUEENS BUS NETWORK REDESIGN PROPOSED FINAL PLAN**

a. Avoiding Chokepoints

One of the stated key objectives of the PFP is to improve bus speeds and service reliability by avoiding traffic congestion "choke points". PFP page 10-11.

"Even small decreases in bus speeds can have a cascading effect on customers' overall travel times. Congestion is the leading cause of declining bus speeds and service reliability in Queens. It is often worse on key corridors and choke points, amplifying its detrimental effect on bus speeds and in turn the reliability of bus service. This further deters would-be customers from choosing to take the bus."

PFP at pages 10-11.

This proposed extension of the Q110's new route into Floral Park would, among other problems, exacerbate already existing traffic congestion along Carnation Avenue, Tulip Avenue and/or South Tyson Avenue, especially during the early morning and evening commutes. This is directly contrary to the PFP's stated objective to improve bus service by avoiding choke points.

b. Focusing improvements on "bus priority corridors"

The Proposed Final Plan states that the NYC DOT identified bus priority corridors in which to focus improvements. PFP at page 25. These "bus priority corridors" identified by the NYC DOT and listed in the PFP are not located in or near Floral Park. See PFP at page 27. Wouldn't scarce resources be better spent invested in improvements along the identified "bus priority corridors" as stated in the PFP?

G: ANY PROPOSAL TO RUN BUS LINES THROUGH THE STREETS OF THE INCORPORATED VILLAGE OF FLORAL PARK IS SUBJECT TO BOTH THE VILLAGE'S RESTRICTIONS AND TO THE REQUIREMENTS OF THE NEW YORK STATE TRANSPORTATION LAW SECTION 153.

Village Law

Both Carnation Avenue and South Tyson Avenue are Village roads. Therefore, all buses must conform to the restrictions that the Village has and will be imposing under its Village code.

Section 6-602 of the Village Law provides that:

The streets and public grounds of a village constitute a separate highway district and are under the exclusive control and supervision of the board of trustees or other officers of the village when such control is delegated to them by the board.

Further, Section 1640 of the New York State Vehicle and Traffic Law authorizes the Board of Trustees to regulate all vehicular traffic within the Village.

New York State Transportation Law Section 153

Section 153 of the New York State Transportation Law requires an application for authorization from the New York State Transportation Commissioner to operate a bus line through a village, and in the event of an objection by the village, a hearing on such application must be held. NYS Transportation Law, Section 153(5). Upon the proper application of MTA Bus for such authority, the Village will submit opposition and request a hearing on such application on the grounds set forth in this Objection.