Chapter 22: Response to Public Comments

A. INTRODUCTION

This chapter of the Final Environmental Impact Statement (FEIS) summarizes and responds to substantive comments received during the public comment period for the Belmont Park Redevelopment Civic and Land Use Improvement Project Draft Environmental Impact Statement (DEIS) and the draft General Project Plan (GPP), which were issued on December 6, 2018.

The State Environmental Quality Review Act (SEQRA) requires a public hearing on the DEIS as part of the environmental review process. The New York State Urban Development Corporation Act (UDC Act) requires a public hearing on the GPP. The combined public hearing was held on January 8, 9, and 10, 2019, at Elmont Memorial Library, 700 Hempstead Turnpike, Elmont, NY 11003. The comment period remained open until 5:00 PM on March 1, 2019. A number of comments were submitted beyond the March 1 deadline, and were accepted and addressed by Empire State Development (ESD).

Section B contains a summary of relevant comments on the DEIS and GPP, and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the EIS. Where more than one commenter expressed similar views, those comments have been grouped and addressed together. A list of organizations and individuals that provided comments relevant to the EIS can be found in Section C. All oral and written comments are included in digital format as Appendix L, “Public Comments Received on the DEIS and Draft GPP.”

B. COMMENTS AND RESPONSES

PROJECT DESCRIPTION

PUBLIC REVIEW PROCESS

Comment 1-1: Will ESD use its response to public comments as an opportunity to explain why an impact is not significant, and to explain why a particular topic is not included in the FEIS or how an alternative or proposed mitigation would work? (Stetson_TS1_894)

Response 1-1: These responses to public comments address specific questions and concerns related to the DEIS and the GPP. In addition, previous chapters in this FEIS address issues raised during the public review process with greater specificity, and identify measures to reduce the Proposed

1 This chapter is new to the FEIS.
Project’s significant adverse environmental impacts to the maximum extent practicable consistent with social, economic, and other essential considerations. All EIS analyses were conducted in accordance with SEQRA and the Final Scope of Work (the “Final Scope”), which was reviewed and commented upon by the public.

Comment 1-2: Has ESD fulfilled its obligations under the UDC Act in a meaningful and transparent manner? UDC Act § 6266(1) provides that the ESD: shall work closely, consult and cooperate with local elected officials and community leaders at the earliest practicable time. The [ESD] shall give primary consideration to local needs and desires and shall foster local initiative and participation in connection with the planning and development of its projects.

On its face, giving “primary consideration to local needs and desires” is a statutory mandate imposed on ESD. Based on the comments at the DEIS/GPP hearings in January, there is virtually no support within the surrounding communities for a project of this scale and magnitude. For ESD to accept and approve this project, as proposed, it necessarily will be rejecting all consideration of local needs and desires.

Floral Park respectfully calls upon ESD to heed the legitimate concerns of the communities surrounding Belmont Park. The project must be dramatically altered and downsized so impacts can be avoided and actually mitigated, and then a new DEIS can be issued accordingly. (VFP_2547)

The EIS should be managed in coordination with the local communities and small business leadership. (Alfonsi_2567, Flood_2394, Smith_2570, VFP_2574, VLI_2125)

Response 1-2: In accordance with UDC Act 6266(1), ESD has worked closely, consulted, and cooperated with local elected officials and community leaders and given primary consideration to local needs and desires through a robust community engagement process. As detailed in Chapter 2, “Land Use, Zoning, and Community Character,” the proposed uses are consistent with the Elmont Vision Plan and consistent with the County’s comprehensive planning documents and policy recommendations, as one of the major goals identified by the County is for this area to leverage the prominence of Belmont Park to spur economic development and to create an important gateway to Long Island. ESD has extensively consulted with representatives of Nassau County and the Town of Hempstead, as well as New York State Department of Transportation (NYSDOT), New York City Department of Transportation (NYCDOT) and the Metropolitan Transportation Authority (MTA). ESD also has met with, and solicited the views of municipalities and community organizations in the vicinity.
of Belmont Park, including Elmont, Floral Park, South Floral Park, Bellerose and neighborhoods in Queens. Moreover, ESD has organized the Belmont Community Advisory Committee (CAC), which is comprised of 15 community members appointed by local elected officials and ESD to facilitate open communication and engagement with local residents and other stakeholders. The CAC has met with ESD at least quarterly since its formation on February 6, 2018 to hear updates on the Proposed Project and provide community feedback to ESD. ESD has given primary consideration to the broad spectrum of local needs and desires identified as a result of its close consultation with government officials, community leaders, and small business leadership (e.g., Elmont and Floral Park Chambers of Commerce).

ESD has balanced the need for economic development and job creation (as articulated by Nassau County, Hempstead and others) against the concerns regarding overdevelopment raised by the local community. Over the course of the environmental review process the Project has changed as a result of the community outreach and in response to public comments. For example: the maximum height of the proposed hotel was reduced; the hotel and proposed electrical substation were relocated; the maximum amount of retail was reduced; and a new Long Island Rail Road (LIRR) Elmont Station was added to provide improved service to the surrounding community and to mitigate transportation impacts identified in the EIS.

Please also see response to Comment 1-83, and “Environmental Review Process” within Section D of Chapter 1, “Project Description.” See also correspondence from the Office of the County Executive, found in FEIS Appendix M, “Agency Correspondence Letters Post-DEIS.”

Comment 1-3:

There has been no community engagement. Local input is needed to give a realistic evaluation of impacts, including from police, fire, school officials and civic groups. Community engagement is critical. Residents of all age groups should be engaged in the process. ESD hasn’t taken resident comments into consideration and reduced the proposed scope in any way. (Achille_TS4_1024, Alfonsi_2540, Alfonsi_TS3_953, Alfonsi_TS4_1030, Barley_045, Block_CHCA_106, Block_CHCA_133, Block_TS4_972, BPCC_132, Colgan_2542, Comrie_TS4_968, Dixon_2280, Flood_TS1_892, Gillen_TS3_934, Hernandez_TS4_983, Kaplan_TS4_967, Madden_TS3_956, McDonald_TS1_882, McDonald_TS4_1001, Moriarty_2144, Moy_148, O'Grady_TS1_879, Reisig_TS3_949, Sexton_TS4_1028, Smith_TS1_889, Solages_TS1_855, Weickert_TS1_869, Weickert_TS1_869)
Response 1-3: Chapter 3, “Community Facilities and Utilities,” of the EIS and the response to comments in the Community Facilities section below describe input received from municipal service providers. ESD has given primary consideration to local needs and desires through a robust community outreach program including 11 public meetings, 27 tours and smaller community meetings, 20 Community Advisory Committee and local elected official meetings, numerous communications with elected officials and local/state government agencies and staff, and numerous communications with local civic and community groups.

Comment 1-4: There has been a lack of outreach to Queens-based civic organizations and Bellerose. (Hellenbrecht_BCCA_052)

Response 1-4: ESD has met with Bellerose- and Queens-based civic organizations (including Queens Village Civic Association, Cambria Heights Civic Association and the leadership of Bellerose Commonwealth Civic Association), elected officials, and NYCDOT.

Comment 1-5: The Town of Hempstead should be Lead Agency to ensure the project is compatible with the needs of the local community. (VLI_2125)

Response 1-5: As the public sponsor for the Project that is principally responsible for its approval, ESD has assumed the role of lead agency for the Proposed Project under SEQRA. In order for the Proposed Project to proceed, ESD must take an action to affirm the GPP under the UDC Act, which would include zoning overrides. A municipality must be taking a discretionary action to be a lead agency under SEQRA; the Town of Hempstead is not taking any discretionary actions associated with the Proposed Project. However, ESD has included the Town of Hempstead as an interested agency for this environmental review.

Comment 1-6: There should be a Belmont Park Local Advisory Board under NYS Racing Law section 212. This entity would be partly responsible for implementing a comprehensive master and rezoning plan for the area. A community advisory board should be created to represent the communities surrounding Belmont Park. The Community Advisory Committee established by ESD is not what the area residents are demanding. (BPCC_132, Form Letter 6, Gayron_FL6_110, Sexton_TS1_876, Sexton_TS4_1028)

Response 1-6: While it is not required under the New York Racing, Pari-Mutuel Wagering and Breeding Law, ESD has created a community advisory committee for the Proposed Project.

Comment 1-7: The Belmont Community Advisory Committee that ESD put together is not a collaborative committee nor primarily comprised of “community
members.” The actual process is that ESD calls a meeting when they have an announcement (i.e. day before the DEIS was released). (Alfonsi_2540)

**Response 1-7:** The Belmont Community Advisory Committee (CAC), which is comprised of 15 community members appointed by local elected officials and ESD, has properly served its function of facilitating open communication and engagement among ESD, local residents and other stakeholders. The CAC has met at least quarterly since its formation in February 2018 to hear updates on the Belmont project and provide feedback to ESD. The members of the CAC are listed on ESD’s website, [https://esd.ny.gov/belmont-park-redevelopment-project](https://esd.ny.gov/belmont-park-redevelopment-project).

**Comment 1-8:** We are pleased to have the County representative serve on ESD’s community advisory committee. We support the high-impact economic development project proposed. (Katz_TS4_973)

**Response 1-8:** Comment noted.

**Comment 1-9:** The Nassau County Planning Commission should assert its authority to review the project given its size and scope. (Ambrosino_2223, Weiss_THPB_2357)

**Response 1-9:** Due to ESD’s exercise of zoning overrides, there is no basis for referral to the Nassau County Planning Commission for a recommendation. Nevertheless, comments have been received from, and ESD has consulted with, the Nassau County Department of Public Works (NCDPW), Division of Planning & Division of Engineering. See also correspondence from the Office of the County Executive, found in FEIS Appendix M.

**Comment 1-10:** NCDPW is committed to ensuring our residents can enjoy world class entertainment, as well as recreational and sports options, including a first-Class venue to house our beloved NY Islanders. The proposed Belmont Park Redevelopment Project promises to deliver exactly such a venue, along with exciting hotel and retail opportunities. The elements of the project collectively represent the kind of economic development needed to grow Nassau County’s tax base and create both construction jobs and long-term employment opportunities. (Curran_2564)

**Response 1-10:** Comment noted.

**Comment 1-11:** NCDPW notes that requests have been made for independent traffic studies, and is holding those requests in abeyance, pending ESD’s holistic project review. We want to ensure that ESD has an opportunity to complete its comprehensive study of environmental impacts including traffic mitigation. (Curran_2564)
Response 1-11: ESD and New York Belmont Development Partners, LLC and its affiliates, including New York Arena Partners, LLC (collectively, “NYAP” or “the Applicant”) have met with NCDPW and shared the Transportation Management Plan (TMP) strategies. See correspondence from the Office of the County Executive, found in FEIS Appendix M.

Comment 1-12: The community participation process should be led by the Town of Hempstead and the local municipalities. (Alexander_TS1_887)

Response 1-12: As the public sponsor for the Proposed Project, it is appropriate for ESD to take the lead in organizing and implementing the community participation process. The Town of Hempstead has been an active participant in the RFP process and is a member of the Community Advisory Committee formed for the Proposed Project. ESD has also met individually with representatives of the Town of Hempstead, local municipalities and civic organizations (see the response to Comment 1-2).

Comment 1-13: The Water Authority of Western Nassau County (WAWNC) should be listed as an involved or interested party since it will be supplying the public water to the proposed facilities for domestic use and for fire protection. (Swartz_WAWNC_2175, VFP_2548)

Response 1-13: WAWNC has been participating in the environmental review process by submitting comments to ESD. ESD has consulted with WAWNC and addressed the WAWNC’s comments. The FEIS identifies the WAWNC as an involved or interested agency in the FEIS.

Comment 1-14: The DEIS states that school districts in the area will be contacted, but neither Floral Park Bellerose School District nor the Sewanhaka Central High School district has been contacted to date. (Ferone_TS1_852)

Response 1-14: ESD has met with representatives from both the Floral Park Bellerose and Sewanhaka Central High School districts.

Comment 1-15: An independent review of the project and questionable activity should be conducted. BPCC requests a meeting with ESD to learn more about how AKRF was selected and the nature of the terms for the ground lease to NYAP. Transparency is an issue when an organization's statement is manipulated to appear in favor of the project. (Alfonsi_2540, Baggott_2331, BPCC_2087, D'Agostino_TS1_884, deRose_002, Howubnyczky_TS1_851, Howubnyczky-Ortiz_2350, McEnery_2352, Smith_2570)

Response 1-15: ESD retained AKRF through its standard procurement process. In its role as lead agency ESD has engaged the public in a robust and transparent community outreach process (see also response to Comment 1-2).
Comment 1-16: There is a concern that the State committed to the project prior to having completed the environmental review. (BPCC_2198, Galinanes_2250)

Response 1-16: The State has not made any binding commitments with respect to the Project while the environmental review is ongoing. ESD will not make a final determination on whether the Proposed Project should be approved until the SEQRA process is concluded.

Comment 1-17: There is concern that the anticipated construction start date in May 2019 is an attempt to circumvent the SEQRA Process, since the statute of limitation to file an Article 78 is four months after the public notice of the findings statement. A more realistic timeline is necessary to allow time to adequately address the issues raised in the DEIS. The Proposed start of construction as scheduled in Second Quarter of 2019 does not allow time for mitigation of adverse environmental impacts or further assessment of issues raised in DEIS process. (BPCC_132, Gunther_TS3_938, Milazzo_2203, Weissman_TS2_922, Williams_BPCC_012, Williams_TS1_850, Williams_TS1_850)

Response 1-17: Construction of the Proposed Project would not commence prior to completion of the SEQRA process. The revised schedule presented in Chapter 15, “Construction,” of the FEIS—like the initial schedule presented in the DEIS—presumes commencement of construction only after ESD completes the SEQRA process and all necessary governmental approvals are received.

Comment 1-18: The commenters requested an extension of the comment period. (BPCC_132, Culotta_TS4_1036, Pombonyo_TS4_1031)

Response 1-18: On February 1, 2019, ESD extended the DEIS comment period from February 11, 2019 to March 1, 2019.

Comment 1-19: The public’s opportunity to participate in the SEQRA process must be informed and meaningful. ESD has permitted this project to be a moving target, allowing it to increase in magnitude and scope at every stage of the process. Scheduling a DEIS comment period to occur during an extended holiday period militated towards a longer comment period at the outset. Omission of critical information impeded meaningful public review. ESD and the Franchise Oversight Board (FOB)’s failure to provide substantive responses to the Village’s FOIL requests in a timely fashion has further frustrated the Village’s ability to assess this proposal in the time provided. (VFP_2547)

Response 1-19: Contrary to the comment, the information needed for informed public comment was not omitted. At the outset of the public comment period on the adopted GPP and DEIS, ESD provided detailed information about the
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

project sufficient to allow for public comment on these documents pursuant to the UDC Act and SEQRA. The information made available to the public included the adopted GPP, the DEIS and its appendices, and the Site Conditions Study. These documents set forth detailed information about the proposed Project, the methodologies used to assess its environmental impacts, the environmental analysis and its conclusions. The Notice of Completion for the DEIS was issued by ESD on December 6, 2018. Oral and written comments were received during the public hearing sessions held by ESD over a three-day period (on January 8, 9, and 10, 2019) to permit people with schedule constraints to attend. In addition, on February 1, 2019, ESD extended the DEIS comment period from February 11, 2019 to March 1, 2019, which provided for a public comment period over 80 days in duration. With respect to FOIL requests, please see the response to Comment 1-24. The EIS has considered a reasonable worst-case development scenario, and changes in program have been analyzed in the EIS.

Comment 1-20:

The comment period needs to be significantly extended to provide time for ESD to overcome deficiencies in the DEIS, and the situation quite likely also requires reissuance of a revised DEIS. Notice of the issuance of the DEIS was published in the December 12, 2018 issue of the Environmental Notice Bulletin. On February 1, 2019, ESD issued a notice extending the deadline for comments to the DEIS and GPP for the NYAP proposal to March 1st. The comment period should be extended further and ESD should issue a supplement to the DEIS to incorporate documents that were improperly excluded from the DEIS in the first instance. The Village has secured some of that information through FOIL, but the public at large has been shut out. This includes traffic count and intersection LOS data and any agency/proposer correspondence with other entities addressing issues relevant to the analyses in the DEIS. By way of example, the FOIL responses include a communication to the MTA/LIRR concerning the use of the Belmont train station that includes project event scheduling information that is incompatible with assumptions used in the traffic analysis. These types of discrepancies are hidden if a DEIS fails to include critical information. Separately, the City of New York Department of Transportation is undertaking its own traffic assessment of the project’s impacts on areas of Queens because the DEIS study is inadequate—proper analysis is missing.

The traffic analysis is grossly deficient. The DEIS failed to include critical information relating to the traffic analysis, including traffic count and intersection level of service/LOS data used in the analysis. This is a serious deficiency because it foreclosed the public’s ability to review and verify raw data and basic assumptions used in the analysis. The Village
was able to secure this information through FOIL after three months delay. The Village provided the data to its consultant NV5 to review. NV5 produced an assessment of the traffic study as well as this data (attached as Exhibit C). NV5, which focused on areas within Floral Park, identified serious errors in reported data and confirmed that the data was misused in the traffic study. (VFP_2547)

Response 1-20: Backup data for technical analyses is provided to relevant review agencies (in this case, NYSDOT, NYCDOT, and NCDPW) when the DEIS is published. This large amount of backup data is not typically included in an EIS, but is provided upon request. With respect to the data referenced in the comment, it was provided to the Village of Floral Park on January 9, 2019. NYCDOT and NCDPW provided comments on the DEIS and responses to those comments are provided separately in this response to comments document. The DEIS has been updated to account for the use of both the existing LIRR Belmont Park station and the new LIRR Elmont Station; see Chapter 17, “Mitigation,” of the FEIS. With respect to NV5’s comments, see responses in the “Transportation” and “Mitigation” sections, below.

Comment 1-21: Belmont Park Community Coalition members would like to attend the next ESD Board of Directors meeting and request more than 24-48 hours’ notice. (BPCC_1048)

Response 1-21: The notices for ESD Board of Directors meetings comply with the Public Officers Law. Under that law, notice is to be provided in accordance with Public Officers Law Section 104.

Comment 1-22: Public outreach materials should be provided in the languages other than English. About 50 percent of the affected population is non-English speaking. (Hernandez_TS4_983)

Response 1-22: ESD did not receive translation requests prior to the public hearings. In addition, there is no requirement that materials such as the adopted GPP, DEIS or public notices be translated into languages other than English. The project site is located in Elmont. According to the US Census, approximately 50 percent of the Elmont residents only speak English, and the majority of other Elmont residents speak English “very well.”

Comment 1-23: Commenters request copies of the DEIS hearing transcripts. (Greif_094)

Response 1-23: Transcripts were made available to this requestor and have been available upon request. All public comments including DEIS hearing transcripts are also found in Appendix L of this FEIS (available only in digital format).
Comment 1-24: Freedom of Information Law (FOIL) requests for documents that were needed to conduct an independent expert review were not shared in a timely manner. (BPCC_132)

After the finalization of the scoping document, Floral Park became concerned that it would need to secure background information on key topics to be able to meaningfully comment on the DEIS once it was issued. Despite being advised that we would be notified of the results of its search for responsive documents within 20 business days, no responsive documents were provided at that time. ESD released the DEIS, making clear that ESD, for some time, had had ready access to and/or had possession of documents and data which would be responsive to the FOIL requests. We subsequently requested immediate production of certain traffic data, which should have been, but was not included in the DEIS as an appendix, noting that it was critical to allow the Village to properly assess the adequacy of the DEIS’s evaluation of the project’s traffic impacts in and around the Village. After a follow-up letter, on January 9, 2019, ESD hand delivered a flash drive containing traffic count and intersection level of service (“LOS”) data to the Village – information that ESD could have provided many months earlier. On the evening of February 8, 2019, ESD finally provided responses to the FOIL requests, which included older documents that could have been provided earlier and that should have been included in the DEIS itself. All of the relevant correspondence is included in Exhibit A with discrete documents included in the FOIL response addressed elsewhere under substantive topics. (VFP_2547)

Response 1-24: At the outset of the public comment period on the adopted GPP and DEIS, ESD provided detailed information about the project sufficient to allow for informed public comment on these documents pursuant to the UDC Act and SEQRA. The information made available to the public included the adopted GPP, the DEIS and its appendices, and the Site Conditions Study. These documents set forth detailed information about the Proposed Project, the methodologies used to assess its environmental impacts, the environmental analysis and its conclusions. With respect to the traffic data referenced by the commenter, please see the response to Comment 1-20. Additional documents requested under FOIL were also provided pursuant to that statute. There is no specific time period within which an agency must grant access to records in response to FOIL requests. The time needed to comply with the request may be dependent on a number of factors including the volume of the request and the retrieval methods.
Chapter 22: Response to Public Comments

Comment 1-25: If ESD makes any changes to the scope of work in the FEIS, it should provide the public with at least 30 days to review and comment on it, and changes should be indicated in red in the FEIS. (Culotta_2365)

Response 1-25: Additions to the DEIS made in the FEIS are highlighted by double underlining of the additional text in the FEIS. As required under SEQRA, at least 10 days will be provided for consideration of the FEIS after it is issued before ESD makes findings with respect to the Proposed Project.

Comment 1-26: The level of community engagement prior to the issuance of the RFP is questionable. During the public comment period, a NYAP representative remarked that they met with ESD officials before the Request for Proposals were even published, therefore seriously undermining the public’s confidence in the entire process. The ESD needs to clear the air and disclose all its interactions and discussions with NYAP representatives before the Request for Proposal was published in order to dispel any concerns that have been raised about the process. (BPCC_132, McEnery_2392)

Response 1-26: ESD officials did not communicate with any NYAP representatives before the publication of the RFP. With regard to community involvement, ESD documented all of its community engagement throughout the RFP processes. ESD has met with a wide variety of groups and individuals representing high school students, young families, senior citizens and other members of the surrounding communities.

Comment 1-27: What entity decided to add an additional 7 acres on parcel A and how was this determined? How was Ewing Cole aware of the additional 7 acres of parcel A seven months prior to the release of the RFP? Does Ewing Cole act as a representative for NYRA in the project plan? Were they involved in discussion during environmental review? (VFP_2548)

Response 1-27: ESD understands that NYRA agreed to surrender the seven acres as surplus to its future needs prior to the issuance of the RFP. ESD was not involved in NYRA’s planning with its consultant, Ewing Cole. NYRA was consulted during the environmental review, but Ewing Cole was not involved in the environmental review.

Comment 1-28: Why has ESD not provided the criteria they used to select NYAP and reject other proposals? Why did NYAP modify the original plan? Did NYAP change the development of Site B due to community outreach or to demands from a development partner? (VFP_2548)

Response 1-28: The selection criteria used to select NYAP are set forth in the RFP. NYAP, working with the Community Advisory Committee, proposed a revised plan that was reviewed during the environmental review scoping
process. With respect to modifications to the original plan, as described in the Draft Scope, the Applicant sought community input and consulted with retail specialists to understand how to optimize the arrangement of uses for the Proposed Project’s visitors. As described in the Final Scope, the Applicant selected “Option 2” which located retail uses on Site B. “Option 1” which was originally advanced by the Applicant was studied as an alternative in the DEIS.

Comment 1-29: There is no discussion why the other 2 proposals in the RFP were not accepted. The final scope stated that the project description would provide additional detail on the planning history of Belmont Park, including the developer RFP process. However, this is omitted. Why was this project selected over the other proposals? (VFP_2548)

Response 1-29: On September 28, 2017, three proposals were received in response to the RFP, and on October 26, 2017, the three teams were invited to in-person presentations and a question-and-answer session held at ESD. On December 4, 2017, one of the respondents withdrew its submission.

To review the remaining proposals, ESD formed five Technical Committees, consisting of 12 ESD staff members and outside environmental consultants. The committees addressed: 1) Real Estate and Economic Impacts, 2) Finance, 3) Environmental Review, Planning and Design, 4) Community Benefits, and 5) Procurement and Diversity Practices. A four-person Selection Committee was formed to evaluate and score the proposals, comprising two staff members from the ESD Real Estate and Planning Department, a member of ESD Contract Administration, and a staff member from the Real Estate Services group at the Office of General Services (OGS). Both the Technical Committees and the Selection Committee prepared questions for each team to respond to in writing and helped draft the term sheets that were sent to each team to complete.

After reviewing all of the materials submitted and having the opportunity to ask each team additional questions, the Selection Committee scored the proposals on a scale from 1 to 10 (with 1 being the lowest and 10 being the highest) on the Selection Criteria, which were listed on page 15 of the RFP. Based on this evaluation process, NYAP scored the highest in the judgment of the Selection Committee.

This information and additional detail are included in the “Planning History and Developer Request for Proposal (RFP) Process” in Chapter 1, “Project Description” of the FEIS.

Comment 1-30: DEIS Chapter 1, “Project Description,” footnote 7 says the NYRA would surrender 7 acres on Site A. What legal right or document gives NYRA
the legal ability to surrender this land? When was the last time when park land was surrendered in NY State? Isn't the transfer of park land restricted under state law? Has the issue of the restriction on the transfer of park land been addressed? (VFP_2548)

Response 1-30: The area is not parkland under New York State Law, and is not open to the general public free of charge. Approximately seven acres at the eastern edge of Site A are part of an area of the Belmont Park Racetrack referred to as the “Backyard.” The Backyard is an operating component of Belmont Park that is used by customers to engage in Racetrack activities. The Backyard contains betting facilities and monitors to watch horse racing, and is open to customers on racing and simulcast days. It is anticipated that the surrender of the property would be effectuated through an amended and restated lease between NYRA, as the tenant, and the FOB, as the landlord.

PURPOSE AND NEED

Comment 1-31: The DEIS offers no basis to conclude that the project, as specifically proposed, is needed; the DEIS also reaches unsubstantiated conclusions regarding the project’s benefits. According to the DEIS (Chapter 1 at 1-9), ESD identified the following development objectives for the redevelopment of the Project Sites in the RFP: Enhance Belmont Park to become one of Long Island’s premier destinations for entertainment, sports, hospitality, and retail, with uses that are complementary to the existing Belmont Park Racetrack; Maximize economic benefit to the State while minimizing significant adverse environmental impacts; Provide a source of quality jobs for area and New York State residents; Benefit the neighborhoods and communities adjacent to and surrounding Belmont Park; Maximize incorporation of green building and sustainable design practices; and Feature meaningful participation of Minority-and Women-Owned Business Enterprises (MWBE), and Service-Disabled Veteran-Owned Businesses (SDVOB). [emphasis added]

Floral Park does not dispute that the two project development sites are underutilized, and could be developed for a productive purpose. However, given magnitude and scope of the Proposed Project, which has only grown since the RFP award was first announced, ESD has failed to satisfy one of the key objectives it has established. This project simply does not minimize significant adverse environmental impacts. (VFP_2547)

Response 1-31: The objective under SEQRA is to minimize adverse environmental impacts to the maximum extent practicable, consistent with social, economic, and other essential considerations. Thus, ESD will weigh any adverse environmental impacts of the Proposed Project disclosed in the
FEIS against such other relevant considerations, and minimize those impacts to the maximum extent practicable in light of that analysis.

Comment 1-32: ESD’s authority to obtain the sites under the UDC Act of 1968 is questionable since the State created the blight since taking over the parcels. What makes the Belmont area substandard or unsanitary such that it qualifies as a UDC Act Civic and Land Use Improvement Project? (BPCC_132)

Response 1-32: ESD engaged VHB Engineering, Surveying, Landscape Architecture and Geology, P.C. (VHB), an independent consultant, to examine conditions at the Project Sites. After inspecting their physical condition and considering their effect on the surrounding area, VHB issued a written report (available on the ESD web site) stating that the Project Sites, considered as a whole, are substandard and underutilized, economically stagnant and in a deteriorated condition. VHB also noted that they generate minimal employment and do not contribute to the sound growth and economic well-being of the surrounding areas. New York State did not create these conditions. Rather, they have resulted from a number of factors affecting the operation of the Racetrack, including the sharp decrease in attendance that occurred in the years after the 1970s, which caused the former operator (the New York Racing Association as it was then constituted) to file for bankruptcy in 2006. Since that time, the State has sought to formulate strategies to redevelop the Project Sites.

Comment 1-33: Floral Park has long supported the need to develop underutilized parcels within Belmont Park. But it also has called for the development of a Master Plan for Belmont Park to guide development in an appropriate, measured way that not only enhances local and regional economic development but also protects the unique character of the communities surrounding Belmont Park and Belmont Park itself. Unfortunately, a Master Plan has never been developed. As a result, there has been a distinct lack of cohesiveness and vision associated with development proposals for Belmont’s underutilized lots and improvements to Belmont’s existing infrastructure while respecting its unique and cherished role at the forefront of the nation’s thoroughbred racing industry. The current proposal proposed by NYAP and sponsored by ESD fares no better. (VFP_2547)

Response 1-33: As detailed in Chapter 2, “Land Use, Zoning, and Community Character,” the proposed uses are consistent with the Elmont Vision Plan. Please also see responses to Comments 1-131 and 1-48.

Comment 1-34: What will happen to the project if the Islanders no longer have use for it? Make the arena multi-functional so it won’t be obsolete in a few years.
Chapter 22: Response to Public Comments

What happens if the Islanders pull out of the project? (Hanson_TS3_957, Marinacci_TS4_998, Pelletiere_TS2_908)

Response 1-34: The proposed arena would be multifunctional, hosting a variety of small, mid-size, and large sporting and non-sporting events. The Islanders would be contractually obligated to tenant the arena, and would have a strong financial disincentive to breach that contract. While such a scenario is speculative and outside the scope of this SEQRA assessment, it should be noted that NYAP would continue to have a Payment In Lieu of Taxes (PILOT) obligation, would continue to host events at the arena, and would continue to support jobs at the arena and at other Project components.

Comment 1-35: If this project does not turn out to be as great as planned then what happens? What will happen to the site if the mall venture fails? (Praino_TS3_946, Smith_2570)

Response 1-35: If the retail village component of the Project were to fail, which is a speculative notion, ESD would have the right to terminate the lease and ESD would either solicit new proposals or the Property would revert back to the ownership of New York State acting by the FOB.

Comment 1-36: The demand/need for another arena is questionable given the proximity of Nassau Coliseum and the low attendance levels at Islanders games. There is also an arena proposed and being built in Suffolk County. (Alexander_TS1_887, Amato_TS1_846, BPCC_132, BPCC_145, Conway_TS4_1035, Gribbins_TS2_907, Halop_TS4_999, Harrington_2067, Hathaway_2090, Kaplan_2083, Kaye_TS2_921, Lasher_082, Marinbach_021, Mazzotta_037, McGunnigle_015, Mesnick_2237, Mesnick_TS1_870, Mezzetti_100, Moore_TS3_952, Morgan_2351, Morgo_2241, Morgo_2327, Rossi_2242, Sciara_2233, Sexton_TS4_1028, Sferlazza_2263, Solages_2402, Thompson_TS4_1002, Tony_2084)

The project should be moved to the Nassau Coliseum. The Islanders should play at the Coliseum. (Anskat_2397, Bailey_042, BPCC_2077, Compo_010, Culotta_2365, Culotta_2572, Gietschier_2106, Gribbins_TS2_907, Harrington_2067, JB_2553, Laliguori_2079, McEnery_2392, Petrosino_2066, Riebe_2075, Sandas_034, Sullivan_2359)

The proposed new home for the Islanders does not make sense as the location is inconvenient for those on the Island to get there by car. It is hard to imagine them selling out at this location. What will happen to the facility when there is no hockey played? It is too bad that a soccer stadium cannot be part of the plan. (Marinbach_021)
Response 1-36: The arena would meet the demand for larger events that cannot be hosted at smaller venues such as Nassau Coliseum or the proposed Suffolk County arena due to the smaller seating capacity at alternate arenas. In addition, the Commissioner of the NHL has indicated that Nassau Coliseum is not suitable to be the home for an NHL team. As currently planned the proposed Suffolk County arena would house only 7,500 seats for minor league hockey games. See also the response to Comment 1-34.

Comment 1-37: The DEIS states that the arena would primarily serve customers in Long Island. Why is the arena being built on the Long Island-Queens border instead of a more central location? (VFP_2548)

Response 1-37: As described in the “Purpose and Need” section of Chapter 1, “Project Description,” a primary objective for the redevelopment of the Project Sites is to enhance Belmont Park to become one of Long Island’s premier destinations for entertainment, sports, hospitality, and retail, with uses that are complementary to the existing Belmont Park Racetrack. Belmont Park is on the Long Island-Queens border. As detailed in Chapter 7, “Socioeconomic Conditions,” the primary trade area for the proposed arena is the entire New York-Newark-Jersey City, NY-NJ-PA MSA, understanding that a significant number of visitors to the arena would originate within Long Island.

Comment 1-38: Was the 2017 RFP solicitation intended to strengthen Belmont Park? If so, why does the DEIS claim that the Proposed Project will not induce growth or attendance to Belmont Park. (VFP_2548)

Response 1-38: The purpose of the RFP was to solicit proposals that would strengthen Belmont Park as a premier destination for entertainment, sports, recreation, retail and hospitality on Long Island. As described in Chapter 20, “Growth Inducing Aspects,” the Proposed Project is not expected to induce additional growth outside of the Project Sites. While some arena and retail patrons could attend future racing events at Belmont Park, it is not expected that the Proposed Project would contribute substantially to attendance at these events.

Comment 1-39: The study ESD used to determine uses for the site were from 2008. That was almost 10 years old when the RFP was issued. Has the data/recommendation become stale? (VFP_2548)

Response 1-39: ESD used the Elmont Vision Plan to inform the goals of the RFP. While the Plan including its data was almost 10 years old, the goals of the Elmont Vision Plan are still pertinent.

Comment 1-40: Consider putting money into existing infrastructure at Belmont, starting with the Grandstand. (Powderly_006)
Response 1-40: Improvements to the Grandstand and other racetrack facilities are within the exclusive control of NYRA and therefore are outside the scope of this Project.

Comment 1-41: A complementary use is needed to sustain the vitality of the Racetrack. There is concern that the horse racing facility cannot survive without another component such as a casino, or shopping center. (Sapienza_TS1_873)

Response 1-41: Comment noted.

Comment 1-42: What Elmont needs is affordable housing. This project won't address that. (Anonymous_083, Tommy_040, Sferlazza_2263)

Response 1-42: The RFP solicited proposals complementary to activities at Belmont Racetrack and explicitly prohibited residential development.

Comment 1-43: The project should not include office space as there is no need. (Wagner-Tyson_TS1_863)

Response 1-43: The Proposed Project does not emphasize office uses. As described in Chapter 1, “Project Description,” the Proposed Project would introduce up to approximately 30,000 gsf of office space that is expected to be used by New York Islanders staff and for Proposed Project operations.

COMMUNITY BENEFITS

Comment 1-44: There is concern that the project will not benefit the local communities and residents; local residents’ needs are not being met. (Alfonsi_2360, Alfonsi_2400, Alfonsi_2540, Ambrosino_1317, Anonymous_083, Baggott_2331, BPCC_132, BPCC_2195, BPCC_2545, Browne_TS1_853, Buechler_FL2_026, Buechler_FL3_030, Buechler_FL4_032, Cheng_014, Cheng_109, Coven_2230, Coven_2231, Coven_2232, Crowe_FL8_2073, Crowe_FL9_2074, Culotta_2572, Culotta_TS3_963, Culotta_TS4_1036, Forbes_TS4_1021, Form Letter 1, Form Letter 2, Form Letter 3, Form Letter 4, Form Letter 8, Form Letter 9, Gillen_TS3_934, Greene_TS3_944, Grodenchik_TS4_971, Gross_TS1_858, Gunther_TS3_938, Kaplan_TS4_967, Kelleher_TS1_859, Kubler_FL1_007, Liebmann_TS4_981, McDonald_TS4_1001, McGovern_2322, Moriarty_2144, Motley_081, Pfeiffer_TS2_899, Reisig_TS1_861, Smith_2570, Thompson_TS4_1002, Trainor_TS1_854, VFP_2548, Walker, Jr_TS4_979, Walker_TS4_978)

Response 1-44: In accordance with UDC Act 6266(1), ESD has considered local needs and desires expressed in a robust community consultation process. See also the response to Comments 1-2 and 1-48.
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

Comment 1-45: The Developer should commit to a Community Benefits Agreement to offset potential impacts to the surrounding municipalities. Services to be provided could include a community center, police and fire infrastructure improvements; local school infrastructure improvements, etc. (Ambrosino_2223, McEnery_2352, McEnery_2392, PCA_020, Solages_TS1_855, TMCA_024, VFP_2548)

The following demands should be placed into the lease and liquidated damages be given to the municipality if they are not met: a state-of-the-art community center; updates and improvements to the facilities for the 5th Precinct and Elmont Fire Department; and agreements with the local schools for infrastructure. (Solanges_TS1_855)

Response 1-45: In accordance with UDC Act 6266(1), ESD has considered local needs and desires expressed in a robust community consultation process. As described in the GPP, NYAP is required to build a community space and perform offsite park improvements as part of the Project. Questions about the type of community center space and the provision of police and fire services are addressed within the “Proposed Community Space” and “Community Facilities and Utilities” sections, respectively, of this chapter. Police and fire services are also discussed in Chapter 3, “Community Facilities and Utilities,” of the EIS. With respect to local school infrastructure improvements, PILOT revenues from the Proposed Project would flow through the County to local municipalities, including local school districts.

Comment 1-46: There is an opportunity to utilize this project to the long-term benefit of current and future residents. (Jean Pierre_TS3_937)

Response 1-46: Comment noted.

Comment 1-47: The traffic impacts outweigh the anticipated community benefits. (McClintock_TS3_958)

Response 1-47: Specific transportation concerns are addressed elsewhere in this response to public comments document and Chapter 11, “Transportation.” Chapter 17, “Mitigation,” of the EIS details strategies to minimize to the extent practicable traffic impacts identified in the EIS. With respect to community benefits, please see the response to Comment 1-48.

Comment 1-48: When the developer states that the current project plan would better maximize economic potential, does that mean for the developer’s profits or the communities economic potential? If the surrounding community prefers the alternative site plan, does that not take precedence over the developer’s economic potential? (VFP_2548)
Response 1-48: Purely economic impacts are beyond the scope of a SEQRA review. Economic benefit to the public, including local communities, is pertinent pursuant to the UDC Act 6266(1), which requires ESD to consider the needs and desires of the surrounding communities. Here, in particular, ESD has given primary consideration to local needs and desires through a robust community outreach program including 11 public meetings, 27 tours and smaller community meetings, 20 Community Advisory Committee and local elected official meetings, numerous communications with elected officials and local/state government agencies and staff, and numerous communications with local civic and community groups.

Chapter 1 of the FEIS summarizes the substantial economic benefits to the public, including local communities, from the Proposed Project. It would: i) improve, activate, and revitalize the Project Sites by providing new retail, hospitality, and entertainment uses and substantial employment opportunities that can be locally accessed by adjacent communities; ii) create a gateway to Long Island by creating a striking new presence for the Town, County, and region, and the Project’s architectural design, signage, and landscape elements would transform the current vacant, underutilized, and deteriorated Project Sites for the benefit of the community; iii) create a premier destination by providing a year-round arena, retail, hotel, commercial office space and community facilities space that complement Belmont Park Racetrack, including the return to Long Island of the NHL’s Islanders; iv) promote public safety and create an asset of lasting importance and value to the greater community; v) create over 3,000 permanent jobs and over 9,000 temporary construction jobs, including direct and indirect jobs; vi) spur economic development and produce reliable revenue streams for the benefit of the public; vii) require the developer to pay prevailing wage and encourage local, MBE, WBE and SDVOB participation; viii) diversify the economic base for Belmont Park Racetrack, the Town and the County and economic benefit from the Project Sites in comparison with their current underutilized and deteriorated character; ix) and generate State, County and municipal tax revenues (including sales tax revenues from the retail uses and arena operations, entertainment tax revenues, and income tax revenues) from the Arena, retail, hotel, food and beverage, and commercial office uses. See also economic benefit reporting in Chapter 7 and Appendix I, “Fiscal and Economic Benefits.”

PROPOSED PROJECT SCALE

Comment 1-49: There is concern that the project has grown in scale and scope since it was originally proposed resulting in greater impacts on the surrounding communities. Scale down the size of the project to its original size.
Reduce the scale of the project to prevent a measurable increase in traffic on local roadways. (BPCC_132, Coven_2230, Fishinger_TS1_868, Gross_TS1_858, McCaffrey_TS4_976, McLoughlin_102, Trainor_TS1_854)

The DEIS needs to be sent back to the drawing board because of the improper Project creep by which this selection and SEQRA review was performed. (McEnery_2340)

Response 1-49: Throughout the scoping and EIS process, the project area subject to the NYAP lease has not changed. Although the North, South, and East Lots would now serve as parking lots for the Proposed Project in addition to Belmont Racetrack, the lots would not be leased to NYAP and the impacts that would result from their increased utilization due to the Project have been analyzed in the EIS. As shown in Table 22-1, the amount of proposed office and community space has not changed since the Draft Scope. While the amount of arena space has increased by 85,000 gsf, the amount of retail has decreased by 85,000 gsf. The proposed hotel has increased by 17,000 gsf (an increase of 37,000 gsf between the Draft Scope and DEIS, and then a decrease of 20,000 gsf between the DEIS and FEIS). While the floor area proposed for the arena and hotel has increased, the number of arena seats and hotel keys has not changed since the Draft Scope.

With respect to measures to reduce incremental traffic on local roadways, please see the responses to comments in the “Mitigation” section of this document (below).

<table>
<thead>
<tr>
<th>Proposed Use</th>
<th>Proposed Amount (Draft Scope)</th>
<th>Proposed Amount (Final Scope and DEIS)</th>
<th>Amount Currently Proposed</th>
<th>Net Change since Draft Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arena</td>
<td>660,000 gross square feet (gsf) (up to 19,000 seats)</td>
<td>690,000 gsf (up to 19,000 seats)</td>
<td>745,000 gsf (up to 19,000 seats)</td>
<td>85,000 gsf (no change in number of seats)</td>
</tr>
<tr>
<td>Retail, Dining, and Entertainment</td>
<td>Up to 435,000 gsf</td>
<td>Up to 435,000 gsf</td>
<td>Up to 350,000 gsf</td>
<td>-85,000 gsf</td>
</tr>
<tr>
<td>Hotel</td>
<td>193,000 gsf (Up to 250 keys)</td>
<td>230,000 gsf (Up to 250 keys)</td>
<td>210,000 gsf (Up to 250 keys)</td>
<td>17,000 gsf (no change in number of keys)</td>
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<tr>
<td>Office</td>
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<td>30,000 gsf</td>
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</tr>
<tr>
<td>Community Space</td>
<td>10,000 gsf</td>
<td>10,000 gsf</td>
<td>10,000 gsf</td>
<td>--</td>
</tr>
</tbody>
</table>

Comment 1-50: In response to local concerns over its size, ESD has allowed the scope and magnitude of the project to grow without restraint. On July 31, 2017, ESD issued a request for proposals (“RFP”) for the development of two
Chapter 22: Response to Public Comments

parcels totaling approximately 36 acres (Site A consisting of 8 acres and Site B consisting of 28 acres, the “Project Sites”) within the Belmont Park Property for entertainment, sports recreation, retail and hospitality purposes. The RFP also allowed responders to include proposals that envisioned use of an expanded Site A – up to 15 acres – up to a total 43 acres. Thus, ESD’s default position was that responders should focus on proposals for 36 acres, without ruling out the possibility of proposals for 43 acres. (VFP_2547)

Response 1-50: The RFP allowed respondents to propose a redevelopment on up to 43 acres and ESD evaluated the proposals in accordance with the RFP criteria.

Comment 1-51: Based on the RFP and subsequent materials prepared in response to questions from prospective responders, ESD articulated a preference that proposals (including parking and utilities) be self-contained within the acreage provided, but also offered some hints that project “creep” might be tolerated. (VFP_2547)

Response 1-51: The RFP encouraged Respondents to propose construction of all required project elements on the parcels made available in the RFP, and asked that Respondents identify any elements not located on those parcels.

Comment 1-52: During the comment period on the draft scoping document, substantive concerns were raised by the public concerning various aspects of the project including the height of the proposed hotel and proximity of the proposed substation to the elementary school/youth athletic fields. But there was virtual unanimity among public commenters on one issue: “The project is too big.” The comments were not general in nature but raised detailed, specific concerns about how the project, as proposed, would adversely impact local surrounding communities. One comment captured the essence of the public’s concerns: “this development is the urbanization of the suburbs.” It was sincerely hoped that ESD would respond to these concerns by directing NYAP to significantly reduce the size of its proposal and then study impacts associated with a smaller project. The opposite happened.

The proposal was modified to lower the height of the hotel and move the substation away from the elementary school/youth athletic fields but still outside Sites A and B. However, instead of reducing the size of project in response to overwhelming local sentiment and despite analyses showing that the project would cause severe, unmitigated traffic congestion and community character impacts, ESD allowed NYAP’s project to become even larger. Increased development, more parking (overall and outside the designated development areas) and less open space. The changes from
the RFP to the scoping document to the DEIS reflect a process that is broken.

The overall size and magnitude of this project has grown so big that it will drastically negatively affect the surrounding communities. Our local roads, highways and infrastructure will not be able to handle the volume of vehicles and visitors that project hopes to attract. (VFP_2547)

Response 1-52: In response to community comments including those received as part of the scoping process as well as ESD’s robust community engagement process, the Proposed Project has undergone the following changes:

- Hotel – building moved away from the Grandstand and height reduced (capped at 150 ft).
- Retail – Reduced from up to 435,000 gsf to 350,000 gsf
- Recreational space – moved off-site, NYAP to fund improvements at Elmont Road Park and Hendrickson Avenue Park
- Open space – New plazas and gathering spaces on Site A
- Electrical substation – moved away from the Floral Park Bellerose School, further south near Exit 26D
- LIRR – additional service to the Belmont spur, and a new permanent LIRR Main Line “Elmont” station

With respect to changes in the size of the proposed arena, please see the response to Comment 1-81. In addition, in response to public comments on the DEIS, Chapter 16, “Alternatives” of the FEIS includes a “No Retail Village Alternative.” The assessment of this alternative finds that it would not substantially avoid or reduce Project-related significant adverse impacts and would be less effective in meeting ESD’s development objectives for the project sites. Please also see the responses to Comments 1-49 and 1-62.

Comment 1-53: Another noticeable change relates to the promised Community Center space earmarked for “educational and career development services.” In the December 2017 site plan, this component is shown at the southern tip of Site B, away from other conflicting components of the proposal, with ready access to parking and next to an area of open, green space. By the time the DEIS was issued, the Community Center is placed on Site A directly adjacent to NYRA’s Grandstand and near the proposed arena. (VFP_2547)

Response 1-53: In response to community feedback received in the scoping process and ESD’s robust community outreach process, the community space and recreational space was relocated from the southern tip of Site B. It is anticipated that the community space would be located within one or a number of proposed structures (e.g., the office building, hotel, arena,
retail buildings) and would offer an array of educational and career development services.

Comment 1-54: DEIS states that the arena would host 50 marquee events, 65 large to medium events, and 30 small events. Given that the traffic impacts from these events would be adverse and unable to be mitigated according to the DEIS, I urge that the number of non-NHL events be scaled back. (Culotta_2365)

Response 1-54: The success of the arena is dependent upon its ability to draw a variety of small, mid, and large-scale sporting and non-sporting events for various demographic groups. As described in the FEIS, NYAP would be required to finalize and enforce a Transportation Management Plan (TMP) that would include transportation demand management strategies as well as the operational logistics involving site access and egress. Please see Chapter 17, “Mitigation,” and Appendix J, “Mitigation,” of the FEIS.

Comment 1-55: There is concern that the scale and scope of the project has grown since the original proposal. Commenters request that ESD reduce the scale or the project so that the significant harmful impacts to Floral Park and other surrounding communities (e.g., traffic volume increases) can be avoided. (Alfonsi_2567, Amato_2362, Amato_TS1_846, Ambrosino_1317, Brown_TS2_928, Brown_TS4_974, Browne_TS1_853, Buechler_FL2_026, Buechler_FL3_030, Buechler_FL4_032, Burgess_2310, Cacciatore_TS3_966, Caldon_TS2_910, Casey_2099, Cheng_014, Cheng_109, Cheng_TS1_881, Chiara_TS3_959, Chiara_TS3_960, Conway_TS4_1035, Cornell_129, Corrigan_054, Coven_2230, Coven_2231, Coven_2232, Crowe_FL8_2073, Crowe_FL9_2074, Cuite_TS4_984, Culotta_2365, Culotta_2572, Culotta_TS1_890, Culotta_TS3_963, Culotta_TS4_1036, DAmico_088, Doherty_TS2_897, Fairben_TS4_994, Fitzgerald_TS4_975, Flood_TS1_892, Flood_TS4_1026, Forbes_TS4_1021, Form Letter 1, Form Letter 2, Form Letter 3, Form Letter 4, Form Letter 5, Form Letter 8, Form Letter 9, FPBPTA_2226, Fusco_OLV_2399, Gayron_TS4_991, Gorry_TS4_1010, Gross_TS1_858, Hayden_TS2_930, Henry_2301, Henry_2301, Horn_TS4_982, Jacob_TS3_954, Kelleher_TS1_859, Kellher_TS4_997, Kennedy_046, Kubler_FL1_007, Lagnerre_105, Licari_TS1_883, Lyons_FL5_038, MacDonald_2095, Madden_TS3_956, Martinez_TS2_896, Maurer_011, McClintock_TS3_958, McGovern_2322, McHale_126, McLoughlin_102, Moriatry_2144, Motley_081, Moy_148, Moynagh_TS4_1022, Nicoletto_TS2_925, Nicoletto-Muscarella_2107, OLV Basketball Team_TS4_2068, Pedley_TS4_993, Pelletiere_TS2_908, Pombonyo_TS1_862, Pombonyo_TS2_917, Powderly_006, Reisig_TS1_861, Sawicki_TS2_911, Sexton_048,
Response 1-55: The DEIS analyzed the potential effects of the Proposed Project on Floral Park and other surrounding communities, and the FEIS provides greater detail on measures to minimize the significant environmental impacts that have been identified. Specific concerns raised by commenters are addressed in this chapter.

The EIS analyses conservatively consider a reasonable worst-case condition that assumes a sold-out major arena event without accounting for no-shows. In addition, based on public comments, the overall amount of retail that would be permitted has been reduced from a maximum of 435,000 gsf to a maximum of 350,000 gsf.

With respect to the concerns over changes in the Proposed Project’s scale and scope, please see the response to Comment 1-52.

Comment 1-56: The project scope should be reduced so that the use of the North and East Lots will not be required, as the proposed parking is too close to schools and residences and too far from the arena. Arena parking should be provided on the South Lot. There should be no parking north of the Racetrack. Keep the parking south of Hempstead Turnpike, which was the original plan. People will not want to park so far from the arena and will end up parking in residential areas. (Alfonsi_TS4_1030, Coven_2231, FPBPTA_2226)

Response 1-56: The EIS analyzed the environmental effects of Project parking in the North and East Lots and did not identify the potential for significant adverse impacts. Additionally, as described in Chapter 1, “Project Description,” NYAP has committed to providing a buffer composed of a hedgerow (at least 8 feet in height) with dense evergreen vegetation along a new replacement fence (between 8 and 12 feet in height) with privacy screening along the northeastern boundary of the North Lot to shield the Floral Park-Bellerose School recreation space from parking activities in the North Lot. Additional fencing with privacy screening would be provided by NYAP along Belmont Park Road from approximately Crocus Avenue to Mayfair Avenue to shield the adjacent Floral Park neighborhood from parking activities in the North Lot.

Through a shared parking agreement among NYAP, the FOB, and NYRA, NYAP would utilize up to approximately 6,014 surface parking spaces on the North, South and East Lots, and would permit NYAP to request from ESD a reduction in the number of parking spaces based on
the success of the Transportation Management Plan and other measures designed to reduce vehicle trips to the arena (See Appendix J).

The Proposed Project would include free electric shuttle bus service provided by NYAP from the North and East Lots.

There would be sufficient parking on-site to accommodate the Proposed Project’s and NYRA’s parking demand, such that there would be no need to park in residential areas. Please see the response to Comment 11-171.

Comment 1-57: There is concern that the project changes resulted in an increase in the number of potential visitors to the project. (Alfonsi_2400, Form Letter 1, Kubler_FL1_007, McEnery_2340)

Response 1-57: The Proposed Project changes between the Draft Scope and DEIS, as well as the additional square footage associated with the proposed arena described in this FEIS, do not alter the projected visitation to the Project Sites. Since the Draft Scope, the total number of arena seats has not changed (18,000 for hockey, 19,000 for concerts); and the total number of hotel keys has not changed (250 keys). Further, as described in the FEIS the amount of retail proposed on Sites A and B has been reduced, from 435,000 gsf to 350,000 gsf. Please also see the response to Comments 1-58 and 1-55.

Comment 1-58: There is concern that the project will cause Triple Crown-like conditions more frequently throughout the year. (Carrig_TS4_987, Cornell_129, Gross_TS1_858, Weickert_TS2_900)

Response 1-58: The levels of visitation projected for the Proposed Project would not come close to reaching the Triple Crown-like attendance levels for the Belmont Stakes (now capped at 90,000 attendees to ensure a good customer experience). When accounting for patrons to both the arena and non-arena uses (e.g., retail, hotel, office, and community space), the total non-employee visitation to the Project Sites is estimated to be less than 15,000 patrons most days of the year, and approximately 90 percent of daily attendance is estimated to be less than 30,000 visitors. See Chapter 1, “Project Description,” of the FEIS for further breakdown of estimated visitation to the Project Sites, and the chart below, which shows the distribution of daily visitation volumes (not including employees) to all Project Site components.
Comment 1-59: The traffic associated with mall customers will end up crowding out the arena visitors, threatening the success of the arena project. (McClintock_TS3_958)

Response 1-59: As described in Chapter 11, “Transportation,” visitors to the retail village are dispersed throughout the day relative to arena patrons, who arrive and depart during more concentrated time periods. In addition, parking for the retail village would primarily occur within Site B, while arena patrons would more heavily utilize the South, North, and East Lots.

Comment 1-60: When the NYAP submission was evaluated against its competing plan for an outdoor soccer stadium with underground parking for its attendees, the NYAP proposal that was submitted and initially evaluated had the vast majority of its own on-site parking placed immediately accessible and adjacent to the arena on the 28 acre South lot. NYRA previously stated that its 28 acre parcel south of Hempstead Turnpike encompassed 4,520 parking spaces, while its 8 acre parking field where the proposed arena will be had 1,820 parking spaces, so those 6,340 parking spaces will be all but lost, and only replaced by the 1,900 parking spaces proposed by NYAP, 1,400 of which will be at or below grade at the retail area, not associated with the arena itself. (McEnery_2340)
Chapter 22: Response to Public Comments

**Response 1-60:** In addition to the 1,940 parking spaces located on the Project Site, the Project would also utilize up to approximately 6,014 parking spaces on adjacent Belmont Park Racetrack property, located in that property’s North, South, and East Lots.

**PROPOSED HOTEL**

**Comment 1-61:** The commenters are opposed to the hotel. There is no market demand for the hotel. The hotel is too big. (Alfonsi_TS4_1030, Amato_2362, Amato_TS1_846, BPCC_2104, Brush_130, Gullo_TS4_1034, Horn_TS4_982, JB_2553, McGeever_2555, Petrosino_2066, Powderly_006, Savage_TS4_1003, Thompson_TS4_1002, Wagner-Tyson_TS1_863, Wagner-Tyson_TS2_918, Walker_TS4_978, Zoleta_092)

No sports arenas in the metropolitan area have hotels within walking distance of them except MSG and Barclays; not Citi Field, not Yankee Stadium, not Nassau Coliseum. There's no reason to have a hotel at Belmont. (Tyson_TS2_918)

**Response 1-61:** It is anticipated that the proposed arena and retail village would generate sufficient demand to support the proposed hotel. Moreover, there are hotels within walking distance of comparable arenas, including Barclays, MSG, and NYCB Live (formerly known as Nassau Veterans Memorial Coliseum).

**Comment 1-62:** There is concern that 37,000 square feet was added to the size of the hotel. (Cornell_129, EAM_2563, Form Letter 1, Gross_TS1_858, Kubler_FL1_007)

**Response 1-62:** After the Draft Scope, the Applicant received feedback from the public that the hotel was too tall. That resulted in a redesign of the hotel; the hotel was reduced in height from approximately 265 feet to a maximum of 150 feet, square footage was added to the guest rooms, and square footage was added to the food and beverage program at the hotel’s base. While the square footage increased during the redesign, the total number of keys has not changed. In addition, based on public comments, the location of the hotel was moved within Site A. Between the DEIS and FEIS, the square footage of the proposed hotel has been reduced by approximately 20,000 gsf to account for conference and ballroom facilities with ancillary retail that have shifted from the hotel to the arena (further described in response to Comment 1-52).

**Comment 1-63:** There is concern that the project will include gambling/a casino, and/or convert to Section 8 housing. (BPCC_2126, Ferone_TS2_926, Laguerre_105, Landers_1043, Landers_2243, McNerly_2336,
Response 1-63: Residential development, gaming (e.g., VLT, table games, pari-mutuel, and simulcast wagering), and horseracing were specifically excluded from further consideration in the Developer RFP and are not part of the Proposed Project.

Comment 1-64: What will be the tallest element of the hotel and will it be illuminated? What will be the use of the conference center and ballroom facilities? What is the expected attendance at these facilities? Can 400 spaces accommodate the parking requirements for the hotel including conference center/ ballroom visitors and employees? (VFP_2548)

Response 1-64: As described in the Chapter 1, “Project Description,” the tallest element of the hotel would be mechanical space above the hotel tower. Chapter 6, “Visual Resources,” notes that lighting of the hotel façades may include discrete accents to architectural features, cornice illumination, and rooftop and amenity deck illumination. As described in Chapter 1, Project Description” of the FEIS, conference and ballroom facilities have shifted from the hotel to the arena, and this special event-type use would draw up to approximately 700 attendees. Parking for this event-type use would continue to be accommodated within the hotel parking garage as well as other available parking areas within Belmont Park (as was assumed DEIS).

Comment 1-65: Given that the hotel location is directly below flight patterns for JFK Airport, does ESD need any approvals from FAA to build a structure 150 feet high? If so, this must be disclosed to the public. (Culotta_2365, Culotta_2572)

Response 1-65: The Proposed Project would comply with all requirements with respect to notification and coordination with the Federal Aviation Administration (FAA) as necessary. Any required filing with the FAA would be performed once hotel designs are further advanced.

PROPOSED RETAIL

Comment 1-66: There is concern about the proposed scale of the retail village and that there is no market to support it. In particular, considering that more people order online these days and given the traffic. The viability of building 400,000 gsf of a retail mall in a climate where retail use has diminished radically may yield either a failed project on the site or failed businesses in the surrounding community due to shrinking demand. (Alfonsi_TS1_872, Alfonsi_TS3_953, Alfonsi_TS4_1030, Amato_2362, Amato_TS1_846, Amato_TS3_935, Brush_130, Carrig_101, Carrig_TS4_987, Chatterton_TS2_903,
Response 1-66:

As described in Chapter 7, “Socioeconomic Conditions,” the proposed retail village would be expected to draw customers from an area beyond the local communities surrounding the Project Sites, given that price-sensitive customers looking for particular high-value goods at outlet prices are more willing to travel greater distances to obtain those goods. Additionally, the product offering at the luxury outlet retail component would be distinct from other outlet shopping experiences. Value Retail, which would be the operator of the proposed luxury outlet retail space, specializes in creating “full-price” environments for “outlet price” goods. This combination creates a unique shopping experience that attracts local and regional customers, as well as national and international visitors, as Value Retail’s experience in Bicester, United Kingdom and in Shanghai, China has shown. The primary trade area considered for the competition analysis for the luxury outlet retail component is therefore the entire New York-Newark-Jersey City, NY-NJ-PA Metropolitan Statistical Area (“the MSA”).

Even when including the Proposed Project, the growth rate in retail trade jobs in the MSA would remain slightly below the 1.6 percent increase observed from 2000 to 2016 in the New York City Region, suggesting that the MSA has the capacity to absorb the new luxury outlet retail at the Proposed Project without significantly altering trends in this sector. This is particularly true because the trends in population, income, and tourism in the MSA are positive and the value offering at the luxury outlet retail component of the Proposed Project would be differentiated from the rest...
of the market. For the following reasons, the Proposed Project’s luxury outlet retail offering would not lead to the displacement of other outlet shopping centers or lead to significant adverse impacts in the MSA: the primary trade area for the luxury outlet retail component of the Proposed Project is the entire MSA; retail trade growth in the MSA is expected to be positive; the concept offered by the luxury outlet retail component would be unique for the primary trade area; and the demand at this development would be supplemented by international destination shoppers (for more detail see the response to Comment 7-17).

In response to public comments on the DEIS, the maximum amount of retail for the Project Sites has been reduced from 435,000 gsf as reported in the DEIS to a maximum of 350,000 gsf; the maximum amount of retail that would be allowed on Site B is now 315,000 gsf. In addition, to provide additional context for the scale of the proposed retail, it is noted that based on data reported by the Urban Land Institute in the Shopping Center Development Handbook, 315,000 square feet of retail is on the low end of the general range of gross leasable area (gla) for a “Regional Shopping Center” (typically 300,000 to 900,000 gla). A “Super Regional” shopping center typically ranges from 500,000 to 2 million gla. Woodbury Common Premium Outlets, with over 845,000 square feet of retail, is over twice the size of the proposed retail village.

Comment 1-67: What will happen to the retail village/communities in the future if it fails? There is concern that the mall will fail and be replaced with a casino. (Alfonsi_2540, Amato_2362, Brown_TS2_928, Kennedy_046)

Response 1-67: If the lease is terminated, ESD may solicit new proposals, or the Property would revert back to the ownership of New York State acting by the FOB. Additionally, with the Proposed Actions there would be a deed restriction on the land prohibiting gaming and pari-mutuel wagering.

Comment 1-68: There is a particular concern that the luxury/destination-type retail proposed is not financially accessible to the local community. The luxury retail is undesirable because it would not benefit the local community. Consider scaling down the luxury retail. (BPCC_132, McEnery_2393, McGruder_2145)

Response 1-68: The proposed retail village is not intended to provide day-to-day goods and services typical of neighborhood shopping centers, but the area surrounding the retail village is part of its trade area. The direct economic benefits to the community of the proposed retail would be realized through jobs and retail sales tax revenue to Nassau County. Value Retail, which would be the operator of the proposed luxury outlet retail space on Site B, anticipates hiring approximately 100 employees and there would be approximately 150 brands represented at the retail village, generating
approximately 1,800 full- and part-time employees. Additionally, Value Retail has internships throughout the year at other developments and would do so at the proposed retail village. As described in Chapter 7, “Socioeconomic Conditions,” the Proposed Project would introduce new workers and visitors to the area, thereby increasing the area’s spending power and benefiting existing commercial establishments. The Proposed Project’s operations would also provide opportunities to utilize local material and services during construction and future operations of the businesses. In response to public comments on the DEIS, the maximum amount of retail for the Project Sites has been reduced from 435,000 gsf as reported in the DEIS to a maximum of 350,000 gsf; the maximum amount of retail that would be allowed on Site B is now 315,000 gsf.

Comment 1-69:
There is concern that the retail is planned too close to homes. Fifty feet from houses to the proposed retail is not sufficient. (McEnery_TS3_951, Solages_2402)

Response 1-69:
Retail on Site B would be over 150 feet from the nearest residences. The vegetated buffer would have a minimum width of approximately 50 feet from the Site B property line; there is at least 50 feet of distance from the Site B property line east to the nearest residents’ property lines; and based on current Site B plans, the retail buildings would be at least 50 feet west of the vegetated buffer, meaning that overall there would be at least 150 feet between the proposed retail buildings and the nearest residential properties.

As described in Chapter 4, “Open Space and Recreational Resources,” the Proposed Project would include approximately 3.75 acres of natural green spaces on Site B, including open space areas that would serve as a buffer between the retail and parking uses and the neighboring Elmont residential community. The vegetated buffer would feature landscaped berms, hedges and plantings. The approximately 8-foot-tall landscaped berm and new tree plantings would obscure views of the lower portions of the Proposed Project on Site B from the residential Elmont neighborhood (see Chapter 6, “Visual Resources”). The EIS analyzed the environmental effects on nearby residents from construction and operation of the retail uses that would be part of the Proposed Project. Construction on the berm/buffer would start before construction of the retail village.

Comment 1-70:
The DEIS on page 4-12 states the retail village will attract 8,000 daily visitors yet there is no data on how that number was arrived at. This is also in contradiction to the 8 to 9 million annual visitors that the developer stated at the Q&A session held at the Elmont Library in 2018. P. 7-23 states, "the primary trade area considered for the competition analysis for
the luxury outlet component is the entire New York-Newark-Jersey City, NY-NJ-PA MSA." How is it estimated that only 8,000 people would visit each day when the business model is to draw from a population of 20 million? (VFP_2548)

Response 1-70: The footnote associated with the 8,000 daily visitors mentioned on Chapter 4, page 4-12 of the DEIS explains that the daily visitor projections are based on traffic demand projections for the retail village. These projections were made using Institute of Transportation Engineers (ITE) vehicle trip rates, which is the standard industry source. Overall, along with a strong visitor and tourism base, the size of the NY metro area is a major factor in anticipating there is a sufficient demand in the region to support the Project, but the population of the NY metro area is not itself a useful data point to project daily visitors to the Proposed Project for the purpose of deriving the reasonable traffic demand assumptions needed to assess potential traffic impacts. There has never been a stated assumption of 8 to 9 million visitors at the Proposed Project’s retail village.

Comment 1-71: What tenants are planned for the retail village? (BPCC_132, Kennedy_046, Savage_TS4_1003, Weissman_TS2_922)

Response 1-71: As described in Chapter 1, “Project Description,” the retail village would feature boutique retail stores, restaurants, and special events to complement the shopping experience; NYAP does not propose to include any large-format “big box” retail uses. The complex is anticipated to host a collection of international, regional and local brands, as well as a collection of emerging, entrepreneurial and innovative brands identified within the New York metropolitan area.

Comment 1-72: The DEIS on page 1-6 discusses “popup [retail] installations.” This could mean events such as winter carnivals. Does the DEIS need to study such impacts? (VFP_2548)

Response 1-72: As described in Chapter 1, “Project Description,” the experiential retail proposed on Site A would be expected to be attractive to not only the proposed hotel’s guests and arena attendees, but also to Belmont Park patrons and the community at large in order to animate the area independent of arena events. In addition to retail storefronts within the proposed buildings, retail may be located within a dedicated structure, and a program of pop-up installations and special events would complement the dining experience. This experiential retail has been incorporated into the relevant analyses of the EIS. In addition, since the issuance of the DEIS, the amount of experiential retail and food and beverage uses proposed for Site A has been reduced from up to approximately 135,000 gsf to up to approximately 35,000 gsf.
**PROPOSED COMMUNITY SPACE**

**Comment 1-73:** The community center is necessary and should be required for the development lease. Where will it be located? Who will fund it? It should be expanded and should provide job training. How is this project going to help our young people? (Alexander_TS1_887, Alfonsi_2400, Culotta_2365, Culotta_2572, Davids_2244, Jimenez_2246, Kaminsky_TS1_845, Kaplan_TS4_967, Labissiere_TS4_1006, Mitchell_2569, Walters_2333)

Would the community space be centrally located in one place or spread throughout the development? (VFP_2548)

**Response 1-73:** As described in Chapter 1, “Project Description,” approximately 10,000 gsf of community space would be funded, maintained and operated by NYAP or its partners. It is anticipated that the community space would be located within one or a number of proposed structures (e.g., the office building, hotel, arena, and retail buildings) and would offer an array of educational and career development services. Please also see the response to Comment 1-76 for more information on anticipated community space programming.

**Comment 1-74:** Please describe the proposed use(s) of the Community Space. What will the building be used for if developer cannot afford to provide community space? Also, according to the site plan, the location of the community space is in a part of the site furthest from the surrounding community. (McGruder_2149, VLI_2125)

**Response 1-74:** The Applicant is required to provide the Community Space as a condition of its lease with ESD. The Community Space would be located within one or a number of proposed structures (e.g., the office building, hotel, arena, and retail buildings) and would provide education and job training opportunities for students, young adults, veterans, and other community members.

**Comment 1-75:** Consider renting the community space to bee keepers. (Moriarty_2144)

**Response 1-75:** Bee keeping is not a contemplated use for the community space.

**Comment 1-76:** There is no community benefit as it will not be overseen by the community. The Elmont Chamber of Commerce believes that a community center would drain revenue and resources and would rather use this as an opportunity to energize the local business community, enhance the economic base of the entire region. (Sapienza_TS1_873, Terry_TS4_1032)
Response 1-76: Approximately 10,000 square feet of community space would be funded and operated by NYAP or its partners (not the community), and would not be a revenue drain for local resources. As initially proposed, the community benefit would be in the ability to provide educational and job training opportunities for students, young adults, veterans, and other community members interested in careers in: sports and entertainment (e.g., sales, technology and systems operations, event production, and journalism); hospitality (e.g., guest relations, manager training, marketing, sales); food and beverage (e.g., culinary skills training, food business incubation, food service training, urban agriculture) and retail (e.g., product management, visual merchandising, retail fundamentals, and manager training).

Comment 1-77: There is concern that the developer cannot afford to provide the community space due to uncertain costs of repairing drainage at Elmont Road Park. (McGruder_2149)

Response 1-77: The renovations to Elmont Road Park and Hendrickson Avenue Park, as well as the construction of the community space are requirements of the GPP with which the Applicant must comply.

PROPOSED ARENA

Comment 1-78: The arena should be built south of Hempstead Turnpike on Site B. Its location in front of the Racetrack/Paddock will overshadow and destroy the beauty of Belmont Park. There are concerns with the proposed location of the arena on the north side of Hempstead Turnpike. (Doyle_1055, Powderly_006)

Response 1-78: The Applicant has proposed locating the arena on Site A, and the EIS analyses consider the potential environmental effects of the location of the proposed arena on Site A, including its visual effects. Specific concerns related to the location of the arena are addressed in this response to public comments document.

Comment 1-79: The commenters are opposed to the arena as it will be a heavy burden on the surrounding areas. (Brush_130, JB_2553, Solages_2402)

Response 1-79: Specific concerns are addressed elsewhere in this response to public comments document.

Comment 1-80: Consider scaling back the project on the way to the arena because visitors will likely use roads as egress to the arena and might use nearby neighborhoods in lieu of paying for parking. (McCaffrey_TS4_976)

Response 1-80: As described in the Chapter 1, “Project Description,” under Purpose and Need, the proposed sports and entertainment arena would serve as the
Chapter 22: Response to Public Comments

new and permanent home for the New York Islanders, an NHL team. The
arena has been designed as a multifunctional facility that would host a
variety of small, mid-size, and large sporting and non-sporting events,
and meet the programmatic requirements of an NHL team. Please also
see the response to Comments 1-36 and 11-171.

Comment 1-81: There is concern that the project added 30,000 square feet to the size of
the arena. The arena should be scaled back. (Cornell_129, Form Letter 1,
Gross_TS1_858, Kubler_FL1_007)

Response 1-81: Between the Draft and Final Scope of Work, the reported measurement
of the arena was increased by 30,000 gsf to reflect adjustment from design
drawings to construction drawings; the actual size and seating capacity
remained the same, only the way of measuring the space changed. As
described in the FEIS, while the proposed seating capacity of the arena
remains the same as reported in the Draft and Final Scope and in the
DEIS, the overall square footage of the arena has increased since the
DEIS by approximately 55,000 gsf—from 690,000 gsf to 745,000 gsf in
this FEIS. This additional arena space would accommodate public and
premium amenities to further enhance patron experience and hospitality.
Specific adjustments are: increased family services and guest concierge
areas to provide enhanced hospitality and gathering spaces for families
during events; additional restroom facilities provided on the upper
concourse to further enhance toilet ratios that already exceeded a typical
arena; a flex space adjacent to the main entry lobby and a grandstand-
facing promenade, both of which were created to provide additional
amenities available to both the arena ticketed patron and the local
community; an additional two-level club was incorporated to provide
additional food and beverage points of sale and entertainment options for
ticketed patrons; a large exterior patio that overlooks the northwest entry
to the site; expanded VIP entry on the southeast corner, allowing for
better circulation ingress/egress for VIP patrons; and an enclosed upper
concourse northeast terrace, allowing for year-round occupancy during
event and non-event times.

Comment 1-82: I hope the arena gets built but they should have an eye to the future and
consider program options like Olympic size ice, practice ice, or a
velodrome. We don’t want a “one trick pony” that is obsolete in a few
years. (Rikert_2202)

Response 1-82: The Proposed Project does not contemplate these uses.

SITE MANAGEMENT, SAFETY, AND SECURITY

Comment 1-83: What is the plan for banning alcohol? (Naughton_TS4_1012)
Patrons would not be allowed to bring alcohol into or out of the Arena or within the parking lots, but alcohol would be available within the arena for purchase by patrons 21 or over. Tailgating in parking lots would be prohibited.

How will the developer plan for potential active shooters or other violence in the arena? There is concern that the hotel could attract shooters. (Praino_TS3_946, Sciara_2233)

The Belmont Arena Project is in the process of meeting the demands and achievements of Department of Homeland Security’s SAFETY Act (Support Anti-terrorism by Fostering Effective Technologies Act of 2002), providing preventative design-based construction, policies and procedures, and smart practices. Such certification requires that the development include a security command center, annual reporting, and self-testing as well as an integrated operational plan with local, state, federal, and international law enforcement. Security staffing would include highly trained individuals focused on deterring and detecting security or safety related issues from occurring on and around the site. NYAP would hold training sessions as part of their emergency operations plan and policy procedures.

Camera Infrastructure would be set up to monitor security threats. NYAP has been and would continue to coordinate with law enforcement agencies. The Nassau County Police Department (NCPD) has stated in meetings with NYAP that it would be in charge of coordinating a multi-agency response when emergencies, including a terrorist threat, occur at the Project Sites. The arena operator would coordinate trainings with both the Nassau County Police Department and the New York City Police Department. NYAP would also work with NYRA to update its existing event-day emergency response plan.

There is concern about safety and loitering from the project and, particularly, if there are vacancies in the proposed shopping area. (Hellenbrecht_BCCA_052, McDonald_TS1_882)

Value Retail would be the operator of the proposed luxury outlet retail space. Value Retail’s most successful property, Bicester Village, has been in operation for nearly 25 years and is the leading shopping center in terms of sales per square foot in the world (be it full price or outlet). Value Retail’s success is predicated on its ability to maintain a comfortable, safe shopping experience for its visitors, and therefore it is in its best interest to properly manage and maintain the shopping environment. There would be no visitor access to the retail village before or after operating hours. The retail village would have a 24-hour security guard and 24-hour camera surveillance.
Chapter 22: Response to Public Comments

Comment 1-86: There is concern about the need for security in the North and East Lots. (DAmico_088, FPBPTA_2226)

Response 1-86: On event days, NYAP would provide a security presence in each parking lot. On non-event days, NYAP would provide regular patrols by on-site security guards in the parking lots. NYAP would have security personnel, signage, and Closed-Circuit Television (CCTV) to monitor and enforce all parking lot regulations, including prohibitions against tailgating and celebratory honking. See also the response to Comment 1-84.

Comment 1-87: There are concerns with respect to the project’s effects on safety. Describe the proposed police and security measures. There are concerns about issues with the proposed emergency vehicle access and emergency response times. (Achille_019, Achille_TS4_1024, Conterelli_017, Form Letter 5, Gonzalez_TS1_847, Kellher_TS4_997, Longobardi_TS4_1029, Lopez_2557, Lyons_FL5_038, Mesnick_TS1_870, Stacom_844, Talty_TS2_929)

The commenter is against the project due to security issues. (Peterson_139)

Response 1-87: As described in Chapter 1, “Project Description,” the Proposed Project incorporates a number of measures to promote public safety. Public gathering spaces such as the existing Belmont Park and the proposed new arena, hotel, and retail village require a strategic approach to safety and security. NYRA already coordinates with the Nassau County Police Department and other agencies for large events such as the Belmont Stakes. The individual proposed uses (arena, hotel, and retail) would establish security staffing and protocols specific to their needs, and NYAP and NYRA would also implement a property-wide security plan in conjunction with this development. Sporting events, concerts and other large-scale events typically require close coordination with emergency service providers and public agencies. NYAP would partner with NYRA and all involved service providers to best manage Belmont Park’s safety and security plan.

NYAP also intends to pursue SAFETY Act certification by the Department of Homeland Security. Such certification requires that the development include a security command center, annual reporting, and self-testing as well as an integrated operational plan with local, state, federal, and international law enforcement.

As part of the Transportation Management Plan ingress and egress routes would be established for emergency vehicles on both Sites A and B. Every event would have an ambulance on site, irrespective of event size. Please also see the responses to Comments 1-84 and 1-86. With respect to emergency response times, please see the response to Comment 3-15.
Comment 1-88: There is concern with respect to child safety given the proximity of the proposed parking lots and gates to schools and homes. Tailgating is a concern. There needs to be a security presence in the North Lot, and workers and employees must be properly screened. A chain-link fence is not a sufficient buffer. A barrier should be in place prior to construction. (Arbelaez_TS3_955, Chatterton_TS2_903, Colgan_2542, Corrigan_054, Crowe_FL9_2074, Dantana_TS2_895, Doherty_TS2_897, Ferone_TS1_852, Gayron_TS4_991, Greene_TS2_924, Kubler_131, Liebmann_149, Liebmann_TS4_981, Mannie_2543, Mesnick_TS1_870, Mezzetti_100, Moy_148, Mullen_TS2_898, Naughton_TS4_1012, Trentacoste_TS4_1019, Weissman_TS2_922)

There is concern about the project’s effects on the safety of the residents in the surrounding area. (Doherty_TS2_897, McLoughlin_102, Post_091, Sawicki_TS2_911, Viscovich_096, Weickert_TS1_869)

There is concern over the Proposed Project’s potential impact on local children. (Colgan_2542, Moroney_TS1_891)

There is a particular concern about the potential for tailgating and how that will be managed. (Alfonsi_2330, Alfonsi_2360, Alfonsi_TS3_953, Culotta_2572, Cunningham_TS4_989, Flood_2394, Flood_2395, Flood_TS3_945, OHagan_053, Tony_2084, VFP_2548)

Response 1-88: Tailgating would be prohibited. NYAP would have security personnel, signage, and CCTV to enforce all parking lot regulations, including tailgating prohibitions.

With respect to concerns over traffic and child/pedestrian safety, please see the response to Comment 11-199.

Based on public comments and Floral Park-Bellerose School Board of Education request, ESD on March 15, 2019 had a site walk of the North Lot/Floral Park-Bellerose School District athletic fields with Floral Park Village and School District representatives to review potential issues and mitigation measures associated with the Proposed Project. As described in Chapter 1, “Project Description,” of the FEIS, NYAP has committed to providing a buffer composed of a hedgerow (at least 8 feet in height) with dense evergreen vegetation along a new replacement fence (between 8 and 12 feet in height) with privacy screening would be provided along the northeastern boundary of the North Lot to shield the Floral Park Bellerose School recreation space from parking activities in the North Lot. NYAP has also committed to additional fencing with privacy screening along Belmont Park Road from approximately Crocus Avenue to Mayfair Avenue to shield the adjacent Floral Park neighborhood from parking activities in the North Lot. Please also see the responses to Comments 1-86 and 1-87.
Comment 1-89: Belmont is an existing hurricane evacuation center. Will this continue? (VFP_2548)

Response 1-89: Belmont Park is no longer designated as a New York City [hurricane] evacuation center. However, if requested, NYAP would be amenable to providing space within the arena as a temporary emergency shelter.

PROPOSED ENTRANCES, EXITS, PARKING AND CIRCULATION

Comment 1-90: How will taxi, Uber and other car services be accommodated? (BPCC_132)

Response 1-90: Chapter 11, “Transportation,” describes drop-off/pick-up and staging locations, and Figure 11-6 identifies those locations on a site plan. As shown in Figure 11-6, the new roadway network would generally consist of access roads within and around the perimeter of the Project Sites to provide access to parking facilities and pick-up/drop-off locations as well as the circulation of buses, trucks, and emergency vehicles. North of Hempstead Turnpike, a rideshare pick-up/drop-off area would be available adjacent to the Grandstand and Belmont access point via an internal project road. South of Hempstead Turnpike, Belmont Park Road would continue along the east side of Site B to a drop-off location and staging area for rideshare vehicles at the southern end of the retail village). A bus stop, valet, and rideshare drop-off and pick-up area would be located near the middle of the retail village.

The “operations plan” of the Transportation Management Plan, found in Appendix J of the FEIS, provides further detail on the operations of car services and rideshare.

Comment 1-91: Provide more details on the pedestrian bridge and what it will look like. (McGruder_2148)

Response 1-91: The Project would provide a pedestrian connection between Sites A and B, either via a bridge or a tunnel. If it is a pedestrian bridge, it would have to comply with the roadway guidelines, including a minimum of 22’ clear from Hempstead Turnpike and no new support columns on Hempstead Turnpike. The pedestrian bridge would be fully covered and would be designed with architectural details to blend with overall project development and to be a gateway feature.

Comment 1-92: What will the “Project Road Tunnel” look like and who will have access to it? Will there be 24/7 security? (McGruder_2148)
Response 1-92: The Belmont Park Road Tunnel (referred to as “Project Road Tunnel” in the DEIS) is an already existing vehicular and pedestrian tunnel that runs beneath Hempstead Turnpike and connects Sites A and B. The public would have access to this road/tunnel. The tunnel has a 9-foot, 3-inch clearance, and has four vehicular lanes and a pedestrian walkway with a guardrail. The pedestrian walkway is approximately 8 feet from the wall of the tunnel to the guardrail, then there is another 1 foot from the guardrail to the curb.

Comment 1-93: Will the helicopter landing be used? If so, when and how? The DEIS fails to mention how the developer plans to use the Helipad located on the Belmont property. Please include in the FEIS how it will service the project development and future needs? Where is it located exactly and how many flights are anticipated per event and at what times exactly? (Alfonsi_2539, VFP_2548)

Response 1-93: The Proposed Project does not contemplate use of the existing helipad. The helipad is located on New York State property and leased to The New York Racing Association. The Proposed Project does not control use of the helipad.

Comment 1-94: The DEIS states that the exact number of parking spots for the North, South, and East lots would be subject to the conditions of the shared parking agreement. Why doesn’t the developer know the number of spots needed? (VFP_2548)

Response 1-94: The number of parking spaces assumed in the DEIS for the North, South and East Lots (6,312 spaces) was based on engineering surveys that maximized spaces for each lot. The analyses in the DEIS and FEIS show that during reasonable worst case conditions, the maximum parking demand from Project-related uses (6,846 spaces) could be accommodated at the parking facilities on the Project Sites (1,940 spaces) and at the North, South and East Lots (6,014 spaces). The exact number of parking spaces to be provided through the shared parking agreement among NYAP, the FOB, and NYRA would be a number that ensures adequate parking to accommodate simultaneous NYAP and NYRA activities and the lease would permit NYAP to request from ESD a reduction in the number of parking spaces based on the success of the Transportation Management Plan and other measures designed to reduce vehicle trips to the arena (see Appendix J).

Comment 1-95: Why was the below grade parking reduced from 2 levels to one? (VFP_2548)

Response 1-95: The structured parking below the retail uses was reduced from two levels to one level due to engineering and cost constraints. Through a shared
parking agreement among NYAP, the FOB, and NYRA, parking demand for NYAP and NYRA could be accommodated within proposed and existing parking areas at Belmont Park.

**Comment 1-96:** Can 40 spaces accommodate the parking requirements for the arena? What are the parking requirements for the arena? Can 1,500 spaces accommodate parking for the outlet mall? What are the parking requirements for the outlet mall? (VFP_2548)

**Response 1-96:** As described in Chapter 1, “Project Description,” the 40 spaces within the arena’s marshalling area would be available only to New York Islanders team members and staff. Arena patrons are expected to utilize parking available at the North, South, and East Lots.

Tables 11-39 through 11-44 in Chapter 11, “Transportation,” present the parking accumulation analysis by use. Any visitors to the retail village who cannot be accommodated within the parking on Site B can be accommodated in the parking available in the South, North, and East Lots.

**Comment 1-97:** Will the taxi ride share area be open during events at the arena and racetrack? Footnote 8 seems to state that it will not (“the 6,312-space total includes approx. 150 parking spaces located in a proposed rideshare staging area in the North lot that would not be available on full event days”). Where will the rideshare facility be on event days? (VFP_2548)

**Response 1-97:** The taxi ride share area would be open on arena event days. The parking analysis in the EIS assumed that these 150 spaces associated with the ride share staging area would not be available for arena event parking.

**Comment 1-98:** Now with the addition of the mega-mall, the parking lots will be a minimum 20 minute walk from the arena and fans will be bused to and from their cars. (Alfonsi_2360)

**Response 1-98:** The Proposed Project does not include a “mega-mall.” According to the Urban Land Institute in the *Shopping Center Development Handbook*, 315,000 square feet of retail is on the low end of the general range of gross leasable area (gla) for a “Regional Shopping Center” (typically 300,000 to 900,000 gla). A “Super Regional” shopping center typically ranges from 500,000 to 2 million gla. Woodbury Common Premium Outlets, with over 845,000 square feet of retail, is over twice the size of the proposed retail village.

Arena patrons would have the option of walking or taking a shuttle to the arena from the North and East Lots as well as parking at Site B. The South Lot is walking distance from the arena.
Comment 1-99: The DEIS states the North, South and East lots would be used for parking. It then states that “both lots are anticipated to be properly illuminated, resurfaced & striped.” How does the DEIS describe these three lots with the term "both"? Are only two going to be illuminated, resurfaced & striped? Please explain. (VFP_2548)

Response 1-99: The quoted text from Chapter 2 of the DEIS relates to a description of the provision of electric shuttle bus transportation from the North and East Lots. As described in FEIS Chapter 1, “Project Description,” the North Lot, currently consisting of gravel parking areas, would be resurfaced and restriped. The South and East Lots would remain in their existing paved condition. New lighting would be provided in all three lots.

Comment 1-100: There should be parking garages instead of open lots. Arriving late to an event can be nerve-wracking. Having to walk far is not acceptable to me either, especially when the weather is cold and windy. I think a parking garage allows for people to walk safely, keeps cars out of the elements, and makes traffic flow a lot easier. (Lehman_2364)

Response 1-100: The proposed parking on Site B would not be an open lot; it would be partially below grade with structure above. All parking areas would include locations for shuttle bus access to Proposed Project components including the arena. In addition, as described in the Demand Management Strategy appended to the FEIS (Appendix J), parking permits would be available to certain ticket purchasers with high occupancy vehicles.

Comment 1-101: The DEIS on page 1-8 states that shuttle transportation would be provided to the lots. What mode of transportation would be used? Where would it be stored while not in use? Where would repairs be made? If buses, why hasn't the effect of exhaust fumes on residents and horses been studied? (VFP_2548)

Response 1-101: The mode of on-site shuttle transportation between parking lots and the Project Sites would be electric vehicles. The vehicles would be stored on site, where they would be plugged in. Repairs would be made at an appropriate location off-site.

PARKING LOTS/OTHER DIRECTLY AFFECTED AREAS

Comment 1-102: Parking should be located south of Hempstead Turnpike, as in the original plan. (Alfonsi_TS3_953, Culotta_TS3_963, Gayron_TS4_991, Kennedy_046, Milazzo_2203, Ra_TS4_969)

Response 1-102: The Proposed Project continues to include parking South of Hempstead Turnpike on Site B. Parking would also be provided North of Hempstead Turnpike within existing lots currently used for vehicle and equipment storage and parking.
Chapter 22: Response to Public Comments

Comment 1-103: Commenters are opposed to utilization of North and East parking lots in Floral Park. (Alfonsi_TS4_1030, Browne_TS1_853, Buechler_FL3_030, Cheng_014, Cheng_109, Chiara_TS3_960, Coven_2231, Crowe_FL9_2074, Culotta_2572, Culotta_TS3_963, Culotta_TS4_1036, Fitzgerald_TS4_975, Form Letter 3, Form Letter 9, Gunther_2344, Longobardi_TS1_856, Longobardi_TS4_1029, McGovern_2322, Smith_TS1_889, Wagner-Tyson_TS1_863, Zoleta_092)

Response 1-103: The EIS considers reasonable worst-case conditions that account for a sold-out arena event and maximum utilization of Belmont Park parking resources. The DEIS disclosed potential effects of the Proposed Project’s utilization of the North and East Lots with respect land use, visual, noise, and construction; the FEIS provides greater detail on the nature of measures and commitments to eliminate or minimize impacts.

Comment 1-104: Commenters are opposed to North Lot given its close proximity to Floral Park-Bellerose School and residences. There is concern that the North Lot abuts the school property and its gate has been left open before. (Alfonsi_TS4_1030, Alfonsi_TS4_1030, Amato_2362, Brown_TS2_928, Chiara_TS3_959, Culotta_2365, FPBPTA_2226, Hayden_TS2_930, Mullen_TS2_898, Sawicki_TS2_911, Stacom_844, Weickert_TS2_900)

Response 1-104: The EIS analyzes the potential adverse impacts to surrounding neighborhoods; the FEIS (including these responses to public comments) addresses specific concerns raised by commenters. The new replacement fence (with privacy screening) would include gates that would be locked and only accessible during an emergency.

Comment 1-105: There is concern that the project changes resulted in parking being proposed adjacent to schools and homes. There is concern that reducing the parking that was designated for Sites A and B necessitates the use and excessive reliance on the North and East Lots. (Alfonsi_2347, Amato_2362, Cornell_129, Culotta_2365, Form Letter 1, Gross_TS1_858, Kubler_FL1_007, Longobardi_TS1_856)

Response 1-105: The Project necessitates ample parking. However, the Project would only require the use of the North and East Lots during peak periods.

Comment 1-106: DEIS Chapter 1, footnote 2 says that it is anticipated that the North Lot would only be utilized to accommodate parking demand for events at the arena and racetrack. Does that mean the East Lot will only be used for retail overflow? How will there be assurances that the North Lot will not be used when there is not an event, what penalties would there be, and to whom would penalties be paid? Why were there originally two levels of
parking under Site B and now only one? The elimination of this additional level under Site B pushed parking to the East Lot, which is more impactful to residents. (VFP_2548)

Response 1-106: The subject of the referenced DEIS Chapter 1 footnote 2 is the North Lot; the footnote has been removed in the FEIS to avoid confusion. The North Lot is primarily expected to accommodate parking demand for events at the arena and racetrack. As described in Chapter 17, “Mitigation,” a small portion of the North Lot would also be used for commuter parking associated with a new LIRR station. No penalties would be imposed on commuters parking in the North Lot on non-event days. The East Lot is also expected to accommodate parking demand for events at the arena and racetrack, as well as any additional demand from the retail village during peak shopping periods. With respect to the number of parking levels proposed for Site B, please see response to Comment 1-95.

Comment 1-107: Why does the DEIS refer to the North & East lots as "overflow Parking"? Can the parking on the South lot, parking under the retail facility, and parking under the arena/hotel accommodate the parking needs for the Arena, Hotel & outlet mall? If not, then the need for the North & East lot is not for overflow parking, but for primary parking. Please explain why the term "overflow parking" is used to describe the North & East lots and clarify whether these lots are for primary parking. (VFP_2548)

Response 1-107: The quoted text in Chapter 2 is in reference to the existing utilization of the North and East Lots overflow parking for the annual Belmont Stakes.

Comment 1-108: The buffer proposed for the North Lot is insufficient. A wide buffer should be provided along the North Lot where there would be unused spaces according to the DEIS. Provide a real buffer between the parking lots and the adjacent communities. A chain-link fence is not enough protection. (Alfonsi_2367, Alfonsi_2567, Culotta_2572, Fattorini_136, Mesnick_2237, Ra_TS4_969, Sexton_TS4_1011, Weickert_2541, Weickert_TS1_869)

A barrier is needed to separate the North Lot from the Floral Park-Bellerose School and surrounding community. A chain link fence is not enough of a barrier. Suggestions include a tall structure or setback, a berm topped with a fence and landscaping or structure like a sound wall. (Browne_TS4_992, Dantana_TS2_895, Ferone_TS1_852, Madden_TS3_956, Mullen_TS2_898, Sexton_TS4_1011, Weickert_TS2_900)

Floral Park needs more details about what "A buffer composed of dense vegetation and a chain link fence would be provided along the
northeastern boundary of the North Lot" means and looks like. (VFP_2548)

I am concerned about proximity of North and East parking lots to homes and schools with no buffer. (Fattorini_136)

The commenter requests more information about what the fence between the project and Floral Park will look like. (McEnery_TS1_886)

Response 1-108: The DEIS did not identify significant adverse impacts that would require additional distance/buffer between the North or East Lot and adjacent communities. As described in Chapter 1, “Project Description,” NYAP has committed to providing a buffer composed of a hedgerow (at least 8 feet in height) with dense evergreen vegetation along a new replacement fence (between 8 and 12 feet in height) with privacy screening along the northeastern boundary of the North Lot to shield the Floral Park Bellerose School recreation space from parking activities in the North Lot. Additional fencing with privacy screening would be provided by NYAP along Belmont Park Road from approximately Crocus Avenue to Mayfair Avenue to shield the adjacent Floral Park neighborhood from parking activities in the North Lot. The gates to the fence would remain closed at all times, except for in the event of emergency evacuations.

Comment 1-109: The berm should be in place before construction begins. (Madden_TS3_956)

Response 1-109: Construction on the berm/buffer would start before construction of the retail village, and its completion would be a condition for arena opening.

Comment 1-110: Provide a barrier to shield adjacent communities from adverse effects. (Solages_TS4_995)

Response 1-110: As described in Chapter 15, “Construction,” construction areas would typically be surrounded by construction fences. With respect to permanent barriers surrounding the Project Sites, please see the response to Comment 1-108.

PILOT/DEVELOPER AND BUSINESS TAXES/PAYMENTS/COSTS

Comment 1-111: There is concern that the Project Sites will be conveyed to the developer for little to no cost. What factors did ESD use to determine the economic value of the land? (Baggott_2331, BPCC_132, Colgan_2542, Morgo_2241)

Response 1-111: ESD issued an RFP which allowed respondents to bid on the property. The transaction between ESD and the Applicant is a fair market transaction confirmed by appraisals received by ESD.
Comment 1-112: There is concern that the developer is being granted property tax abatements, without any corresponding benefits to the community. (Amato_2362, BPCC_132, Horn_TS4_982, Howubnyczyk_TS1_851, Howubnyczyk-Ortiz_2350, Landers_2243, McGeever_2555)

Response 1-112: The Project would include community benefits including new jobs, mass transit improvements, 10,000 gsf of community space, new tax and PILOT revenue, and improvements at Elmont Road Park and Hendrickson Avenue Park.

Comment 1-113: Who is guaranteeing the loans and what are the loan terms? (BPCC_132, PCA_020, TMCA_024)

Response 1-113: The Project is privately funded and the Applicant would satisfy its lenders’ requirements for loan guarantees.

Comment 1-114: The cost of the LIRR station should be borne by the developer, not the taxpayers. (Comrie_104, Comrie_134, Comrie_TS4_968, BPCC_132)

Response 1-114: Comment noted.

Comment 1-115: There is concern that the tax breaks for the developer will have detrimental effects on local businesses, partially through increased local competition when brick and mortar stores are already struggling. (BPCC_132)

Response 1-115: The Project is anticipated to generate new economic activity and support local businesses. With respect to the concern about potential competitive effects, please see the response to Comment 7-15.

Comment 1-116: Homeowners should receive property tax abatement for dealing the with adverse project effects. (McGruder_2147)

Response 1-116: Comment noted.

Comment 1-117: What will the project cost taxpayers? How will the infrastructure improvements be paid for? Will taxpayers have to pick up the cost if the retail fails? Will communities receive revenue from the mall space since the developers have been granted a 15-year tax abatement? If the plan included a way to alleviate taxes for Nassau County as a whole, the project would be more acceptable. (Bellusci_2316, Mezzetti_100, RA_013, Sexton_048)

The commenter requests an analysis of the cost to the current state budgets from special capital spending and the loss of existing tax revenues at the Project Sites versus future projection of new tax revenues resulting from construction and operation of the proposed arena. (BPCC_132)
Response 1-117: These economic concerns are outside the scope of SEQRA. Per the GPP, in the first three years following closing, the Applicant would contribute $50 million towards infrastructure improvements and related mass transit improvements. Thereafter it would continue to make annual payments to ESD following the opening of the train station. The total amount of payments would be approximately $117 million. All other project costs would be privately funded and borne by the Applicant. PILOT and sales tax revenues from the Proposed Project would flow through the County to local municipalities, including local school districts. Please see the essential terms of the transaction of the GPP.

Comment 1-118: How does the project slow the rate of growth in our Elmont resident tax increases? (McDonald_TS1_882, Necerino_TS2_913, Phillips_TS1_874, Sexton_TS4_1028)

Response 1-118: The Proposed Project would add new revenue to the municipality tax base. PILOT revenues would flow through the County to local municipalities, school districts, and service providers, including the Elmont Union Free School District, the Sewanhaka Central High School District, and the Elmont Fire District.

Comment 1-119: The proposed PILOT is not appropriately tied to the true cost of municipal and school district services. PILOTs can have devastating effects on school districts—just look at what happened to Valley Stream. The developer should pay property taxes to help offset the municipal and school district costs. (BPCC_132, Kaminsky_TS1_845, McDonald_TS4_1027, PCA_020, Phillips_TS1_874, Solages_TS1_855, TMCA_024)

Response 1-119: The PILOTs received by the municipality and school districts would be determined through property assessments by Nassau County (as would be the case with real property taxes), and would exceed the value of the payments that the municipality and school districts currently receive for the Project Sites.

Comment 1-120: ESD doesn't describe how the project will be financed, nor does it identify the tax benefits that the state will give to the project sponsor, NYAP. Requests that this information be disclosed. (Culotta_2365)

Response 1-120: The Proposed Project is privately financed as described in the “Project Funding” section of the adopted GPP, located at https://esd.ny.gov/sites/default/files/news-articles/12618-ESD-BM-posting.pdf

As set forth in the GPP, NYAP would pay to ESD, PILOT that would be remitted to Nassau County, which would apply PILOT revenue in
accordance with its municipal practices. ESD would also invest in infrastructure improvements that the Applicant would make on the ESD-owned Project Site and related mass transit improvements. In addition, ESD would cooperate in a sales tax exemption with respect to building materials, fixtures and items related to construction occurring on the Project Sites and mortgage recording tax exemption for the financing of the Project development. See also FEIS Appendix I.

Comment 1-121: ESD should disclose economic incentives provided to the Applicant. (Culotta_2572)

Response 1-121: As set forth in the GPP, NYAP would pay to ESD, PILOT that would be remitted to Nassau County, which would apply PILOT revenue in accordance with its municipal practices. ESD would also invest in infrastructure improvements that NYAP would make on the ESD-owned Project Site and related mass transit improvements. In addition, ESD would cooperate in a sales tax exemption with respect to building materials, fixtures and items related to construction occurring on the Project Sites and mortgage recording tax exemption for the financing of the Proposed Project.

Comment 1-122: Will ESD and the contractor enter a binding contract with penalties for failure to abide by terms set forth in the subsection titled "Measures to Minimize Community Impacts"? If not, how will ESD and the developers fulfill commitments they made in the DEIS? (VFP_2548)

Response 1-122: The development and lease agreement would require the Applicant to fulfill its obligations to minimize environmental impacts, including the measures to minimize community impacts from construction as set forth in Chapter 15, “Construction.” A Memorandum of Environmental Commitments (MEC) would identify all such obligations and would be a covenant under the transaction documents. The MEC would include default provisions and procedures for enforcement.

Comment 1-123: There needs to be a guaranteed revenue stream for all 3 hosting municipalities of the Village of Floral Park, the Town of Hempstead, and Nassau County on an EQUAL share basis. A venue hosting fee of 7.5 percent on any new revenue streams is not unreasonable or unfair. (McEnery_2336)

Response 1-123: This is outside the scope of SEQRA. The taxing authority in the Project area is Nassau County. All PILOT would be remitted to Nassau County which would apply PILOT revenue in accordance with its municipal practices.
Chapter 22: Response to Public Comments

Comment 1-124: What are the anticipated arena event revenues? Who will gain revenues from luxury boxes (business-entertainment deduction), concession stand fees, advertising, naming rights, share tickets, and/or parking fees? (BPCC_132, BPCC_2239)

Response 1-124: The annual revenue from arena-related food & beverage and merchandise purchases is projected to be approximately $47 million. Annual attendance for arena events is projected to be approximately 2.4 million visitors. All food & beverage and merchandise purchases would be subject to local and State sales taxes. In addition, ticket sales for arena events would be subject to a local admissions tax. The arena would also generate PILOT payments, which would be remitted by ESD to Nassau County. The County would apply PILOT revenue in accordance with its municipal practices.

Comment 1-125: What is the planned retail revenue? (BPCC_132)

Response 1-125: ESD has prepared an economic impact study that shows adequate projected revenues for the Project. This study is presented in Appendix I of this FEIS.

Comment 1-126: The Islanders should have to pay for the arena. (Riebe_2075)

Response 1-126: The proposed Arena is privately funded by Belmont Development Partners.

Comment 1-127: Will the Applicant be responsible for financing the Mitigation Measures? (VLI_2125)

Response 1-127: With the exception of a portion of transit improvements, the Applicant is responsible for financing all mitigation measures.

Comment 1-128: ESD should refrain from third-party leases on State land. (Tweedy_TS4_1039)

Response 1-128: The North Lot would be subject to a license agreement among NYAP, NYRA, and the FOB. ESD would own the property and directly lease the Project Sites to NYAP and/or its affiliates.

ANALYSIS FRAMEWORK

Comment 1-129: The DEIS lacks critical information and the process lacks transparency; request for additional time to comment on DEIS. (VFP_2547)

Response 1-129: On February 1, 2019, ESD extended the DEIS comment period from February 11, 2019 to March 1, 2019. Additionally, ESD has given primary consideration to local needs and desires through a robust community outreach program including 11 public meetings, 27 tours and smaller community meetings, 20 Community Advisory Committee and
local elected official meetings, numerous communications with elected officials and local/state government agencies and staff, and numerous communications with local civic and community groups.

Comment 1-130: The Village has been stone-walled by the FOB, which must approve several aspects of the Proposed Project. A FOIL request was submitted to the FOB seeking (i) information relating to planned or proposed improvements on NYRA property linked to the Proposed Project, or any other project, and (ii) recent correspondence concerning NYRA’s current or future activities at Belmont Park, or the Belmont Park Redevelopment Project. In response, the FOB has sent five letters, dated October 16, 2018, November 15, 2018, December 20, 2018, January 15, 2019, February 15, 2019, all stating that “additional time” was required to complete a response. The last letter stated that a status update would be provided by “February 29, 2019” (sic.). All of the relevant correspondence is included in Exhibit B. (VFP_2547)

Response 1-130: The information needed for informed public comment was not omitted. At the outset of the public comment period on the adopted GPP and DEIS, ESD provided detailed information about the proposed Project sufficient to allow for informed public comment on these documents pursuant to the UDC Act and SEQRA. The information made available to the public included the adopted GPP, the DEIS and its appendices, and the Site Conditions Study. These documents set forth detailed information about the proposed Project, the methodologies used to assess its environmental impacts, the environmental analysis and its conclusions.

Comment 1-131: A comprehensive master plan is needed to bring all the surrounding communities together at the decision-making table. Something that is current, something that brings in high-tech jobs, STEM jobs, something that can complement our school district so the children can learn skills. (Sexton_TS1_876)

Response 1-131: ESD has given primary consideration to local needs and desires through a robust community outreach program including 11 public meetings, 27 tours and smaller community meetings, 20 Community Advisory Committee and local elected official meetings, numerous communications with elected officials and local/state government agencies and staff, and numerous communications with local civic and community groups. In addition, the assessment in Chapter 2, “Land Use, Zoning, and Community Character” finds that the Proposed Project complies with the overall goals of the local and County comprehensive plans and policies, many of which focus on the redevelopment of Belmont Park as a principal driver of economic development and revitalization and enhancement of the area surrounding the property, as
well as the foundation for the creation of a gateway into Elmont and Nassau County. Please also see the response to Comments 1-137 and 1-76.

**Comment 1-132:** The DEIS must include an academic study of the effects that built arenas have had on their host communities. Research shows that professional sports arenas are not economic engines of growth as promised, but rather drain local economics. (Alfonsi_1050, Alfonsi_2283, BPCC_132, Williams_BPCC_012, Williams_TS1_850)

**Response 1-132:** The analyses presented in the EIS are consistent with the Final Scope of Work and SEQRA requirements.

**Comment 1-133:** The DEIS states the racetrack only races 90 days, but there is simulcasting of races in Saratoga, and racing at Belmont goes to the end of October. (Amato_TS1_846)

**Response 1-133:** Belmont Park hosts simulcast racing events from Saratoga from the second week of July through Labor Day, and of Aqueduct races from the end of October to the third week in April. According to NYRA, the maximum attendance for simulcast races is approximately 1,500 patrons. These attendance levels are below the amount assumed as part of the reasonable worse case conditions for EIS analyses.

**Comment 1-134:** There is concern that the project will have impacts 365 days/year, not just on game days. (Gross_TS1_858)

**Response 1-134:** The EIS analyses assume reasonable worst case conditions with respect to patronage that, based on conceptual arena schedules, would occur infrequently (see response to Comment 1-58 for more detail). The analyses used “peak” rather than more standard 85 percent capacity conditions to provide for a more conservative assessment. On a vast majority of event days, the amount of visitation and associated adverse environmental effects would be less than what is reported in the EIS.

**Comment 1-135:** The project size will not only affect Nassau County but Queens communities as well. (Stringer_144)

**Response 1-135:** The EIS establishes study areas most likely to be affected by the Proposed Project, and reflect typical EIS standards. For example, the 1/2-mile study area was delineated from the outermost boundary of the Project Sites and the other directly affected areas (e.g., North, South, and East Lots) and is consistent with standard SEQRA practice for assessing land use impacts from development projects on Long Island. The transportation analysis includes locations within Queens.
Comment 1-136: The DEIS Improperly Segments Review of the Project from Review of NYRA’s Planned Improvements to Belmont Raceway. Whether improper segmentation occurs can be determined by considering several factors that are described in the SEQRA Handbook: https://www.dec.ny.gov/docs/permits_ej_operations_pdf/dseqrhandbook.pdf

- **Is there a common purpose or goal?** Both NYAP and NYRA seek to expand sporting and entertainment activities.
- **Is there a common geographic location?** This factor is clearly satisfied here.
- **Timing.** Based on the DEIS and Mr. Kay’s letter, project construction would overlap.
- **Are there common impacts?** Similar activities at the same location will cause similar impacts.
- **Overlapping ownership and control?** As discussed below, the NYAP project, as proposed, cannot proceed absent the consent and cooperation of NYRA.
- **Will any of the interrelated phases of various proposals be considered functionally dependent on each other?** The interdependency of these planned activities is evidenced by the fact that NYAP’s proposal heavily relies on the development of a “shared parking” arrangement with NYRA and use of NYRA land to site a new large electric substation, as well as other utility work. NYRA’s plans necessarily must accommodate these issues.
- **Does the approval of one phase or segment commit the agency to approve other phases?** The NYAP project, as currently proposed, impacts the NYRA property beyond Sites A and B, and has created conditions for NYRA to explore its own expanded activities.
- **Common plan?** There is no overall plan covering both projects and that’s part of the problem. Floral Park has long advocated for a master plan for the Belmont Park property so that disjointed development and segmented environmental impact review would be avoided.

Many of these factors are triggered here, pointing to the need for a thorough review of cumulative environmental impacts, using reasonably conservative assumptions. Despite promises to the contrary, this has not happened. (VFP_2547, VFP_2574)

Analysis of night racing at Belmont should be considered along with the Proposed Project to avoid impermissible segmentation of this project. (Culotta_2572)
Chapter 22: Response to Public Comments

The DEIS mentions the potential for NYRA to implement night racing at Belmont. However, it does not describe how night racing and any associated capital improvements would have independent utility from the Proposed Project. The DEIS should consider the potential impacts, especially traffic. (Culotta_2365)

Response 1-136:

There is no improper segmentation with respect to any NYRA proposed improvements, including the potential for NYRA to obtain legislative authorization to permit night racing at Belmont Racetrack. The Proposed Project has independent utility and is in no way dependent on NYRA activities at Belmont Park Racetrack. Therefore, applying the factors listed in the New York State Department of Environmental Conservation (NYSDEC)’s SEQRA regulations (6 NYCRR 617.2(ah) and NYSDEC’s SEQR Handbook (4th Edition, 2019)), the NYRA proposed improvements are properly not considered part of the Proposed Project. NYSDEC’s SEQRA regulations define segmentation as “the division of the environmental review of an action such that various activities or stages are addressed … as though they were independent, unrelated activities, needing individual determinations of significance.” In assessing whether an environmental assessment has been segmented, NYSDEC instructs lead agencies to consider whether there is a common purpose or goal of each segment, whether there is a common reason for each segment being completed at the same time, whether the activities being potentially segmented are likely to have a common impact, whether the different segments are under the same common ownership or control, whether the segmented component is part of an identifiable overall plan, whether the components are functionally dependent on each other, and whether the approval of one component commits the agency to approve the other components.

Application of these factors establishes that there is no improper segmentation of the NYRA proposed improvements from the Proposed Project. First, there is no common goal for the Proposed Project and the NYRA proposed improvements. The Proposed Project and the proposed NYRA improvements are not part of an overall plan, are not functionally dependent on each other, and approval of one component does not commit the lead agency or any other New York State agency to the other component. For example, ESD could approve the Proposed Project without any approval of the NYRA improvements. Conversely, the NYRA improvements could move forward regardless of whether the Proposed Project is approved and constructed. The Proposed Project seeks to create a gateway to Long Island by improving underutilized and deteriorated parking areas on the 450-acre Belmont site by providing new retail, hospitality, and entertainment uses, including the return to Long Island of the NHL’s Islanders, and create substantial employment
opportunities that can be locally accessed by adjacent communities. The NYRA improvements are designed to address the patron experience at Belmont racetrack, upgrade track drainage and infrastructure, and potentially add new options to the public to experience thoroughbred horse racing via night racing. While the two separate projects may be complementary to one another, there is no need for them to be completed at the same time and such overlap may not occur.

However, as discussed below, to be conservative the EIS has considered, in Chapter 21, “Cumulative Impacts,” the potential impacts should the work on the NYRA proposed improvements overlap with the construction of the Proposed Project. For example, the EIS studied reasonable worst-case conditions for future activity at Belmont Park by the 2021 analysis year, conservatively accounting for NYRA construction and operational activities even though they may not occur by the 2021 analysis year, including the potential introduction of night racing.

Night racing was considered in the future No Action condition in the EIS. The addition of night racing, which has not yet been authorized by the NY State Legislature and is not currently offered at Belmont Park, would not affect the conclusions in the EIS because the lead agency has required that if night racing is approved, NYAP and NYRA would coordinate in such a manner that night racing would not be scheduled on the same evening as a hockey game, and non-hockey arena events could be scheduled on the same evening as long as the aggregate attendance for both events does not exceed the maximum attendance level for a sold-out hockey game (18,000 seats), the reasonable worst case condition studied in the EIS.

Finally, although the entire Belmont property, including the Project Site, is owned by the State of New York, the Belmont Racetrack portion of the Belmont property is leased to NYRA and controlled by that entity, while the Project Site, if the Proposed Project is approved, would be leased to the Applicant, which has completely different ownership from NYRA. While both entities would enter into an agreement to govern shared use of certain parking areas and thus need to coordinate their activities as identified in Chapter 1, “Project Description” and Chapter 21, “Cumulative Impacts,” that need for coordination on certain shared portions of the Belmont property does not mean that the proposed NYRA improvements should be considered as part of the Proposed Project. Moreover, as noted, any potential for cumulative impacts from these separate projects to occur has been fully considered in this EIS.

Comment 1-137: ESD claims that anything to do with the rest of the Belmont Park campus is beyond their scope. They claim that NYRA’s plans for nighttime racing
Chapter 22: Response to Public Comments

are not their concern and is not included in the EIS. Yet, the DEIS admits that the entire project is dependent on NYRA’s portions of the Belmont Park campus including thousands of parking spots. The project spots only include 1,900 parking spaces even though it will attract far more people. NYAP is dependent on NYRA and its portions of Belmont Park. The scope of the DEIS is too narrow and must be redone to include a master plan and a DEIS for the entire 435 acre Belmont Park campus. (McEnery_2340)

Response 1-137: The Proposed Project is separate from any activity that may be undertaken by NYRA at Belmont Park Racetrack (which would be separately funded and operated) and is not part of any common plan for other work that may or may not be pursued by NYRA at Belmont Park Racetrack. The Proposed Project has independent utility and is in no way dependent on NYRA activities. Nevertheless, the EIS studies reasonable worst-case conditions for future activity at Belmont Park by the 2021 analysis year, conservatively accounting for NYRA construction and operational activities even though they may not occur by the 2021 analysis year, such as the potential introduction of night racing, which would require approval by the New York State Legislature to move forward. See also response to Comment 1-136.

Through a shared parking agreement among NYAP, the FOB, and NYRA, it is expected that NYAP would utilize the North and East Lots that are currently utilized for overflow parking only on Belmont Stakes day, as well as for vehicle storage. The South Lot is currently used for Belmont Park event parking. Through this shared parking agreement, parking demand for NYAP and NYRA could be accommodated within proposed and existing parking areas at Belmont Park. The shared parking agreement would not be impacted by night racing or other contemplated future NYRA improvements (see Chapter 2, Section D of the EIS). As noted in response to Comment 1-136, if night racing is approved, NYAP and NYRA would coordinate in such a manner that night racing would not be scheduled on the same evening as a hockey game, and non-hockey arena events could be scheduled on the same evening as long as the aggregate attendance for both events does not exceed the maximum attendance level for a sold-out hockey game (18,000 seats).

Comment 1-138: The project is three separate projects: 1) arena, 2) retail, 3) hotel and each should have its own DEIS. (McEnery_TS3_951)

Response 1-138: The EIS analysis includes evaluation of the potential impacts of the entire Proposed Project. All of the components of the Project share a geographic location, a common project sponsor, a common timeline, and overall project developer.
Comment 1-139: An environmental justice analysis was not done in the DEIS. There are minority and low income populations within the study area that have the potential to disproportionally experience significant adverse impacts from the project. An EJ analysis corresponding mitigation should be done. (Culotta_2365, Culotta_2572)

Response 1-139: NYSDEC Commissioner’s Policy 29 (CP-29) applies Environmental Justice protocols only when the NYSDEC processes the following permit types: State Pollutant Discharge Elimination System (Article 17), Air Pollution Control (Article 19), Solid Waste Management (Article 27), Industrial Hazardous Waste Management (Article 27), and Siting of Industrial Hazardous Waste Facilities (Article 27). None of these permits are required for the Proposed Actions, and thus CP-29 would not apply to the Proposed Actions.

While the Proposed Actions would require GP-0-15-002, the SPDES General Permit for Discharges from Construction Activity, CP-29 exempts general permits from the policy.

Based on a recent review of the U.S. Environmental Protection Agency (EPA)’s EJSCREEN, the majority of the block groups in the study areas have significant minority populations, such as in Elmont in Nassau County and adjacent areas in Queens, although a number in Floral Park and portions of Bellerose do not. Elmont, Queens, and New York City as a whole are minority communities under NYSDEC criteria, since all three have minority populations significantly higher than the NYSDEC threshold of 51.1 percent.

However, the Proposed Project is not expected to result in any disproportionate adverse impacts on minority or low-income populations. The Proposed Project would contribute to the vitality of Elmont, Queens, and New York City. The Proposed Project would create many permanent and temporary living wage jobs, and encourage MWBE and SDVOB participation, with apprenticeship programs and diversity initiatives and commitments anticipated during both construction and operations. Many local residents would benefit from access to the new retail, hospitality and entertainment uses, as well as access to a new LIRR Elmont Station. The Proposed Project would also provide local recreational and entertainment resources and community space.

Although the Proposed Project would also result in significant adverse traffic impacts, most of those impacts affecting the local street network would be fully mitigated and there would be no significant adverse impacts on community character. In addition, the Project’s construction noise impacts would be temporary. Therefore, the Proposed Project is not expected to result in any disproportionate adverse impacts on minority or low-income populations. The project has also included an extensive
Chapter 22: Response to Public Comments

public outreach process pursuant to SEQRA and other relevant statutes and the public was afforded by multiple opportunities to comment on the DEIS such as during three days of public hearings or in writing. Copies of the DEIS were also made available at ESD’s offices, online, and at five local libraries throughout the study area.

Comment 1-140: The DEIS is inadequate. It leaves more questions than answers. It is not comprehensive. It does not disclose the impacts. It is biased toward developer. It does not address the community’s concerns. (Alfonsi_TS4_1030, Amato_2362, BPCC_132, Burgess_2310, EAM_2563, Gunther_2344, Longobardi_TS4_1029, McEnery_2392, McEnery_TS1_886, McEnery_TS3_951, Motley_081, Pombonyo_2398, Thompson_TS4_1002, VFP_2548, Weickert_TS1_869, Yackel_008)

The DEIS was insufficient. Request that it be redone and that there should be a new comment period. Request that this be performed thoroughly without a rush to construction. Request that the DEIS be redone and open for additional review/comment before this project can move forward. (Amato_2362, Burgess_2310, Gunther_2344, Pombonyo_2398, McEnery_2392, VFP_2548)

ESD, a state agency of significant prominence and authority in New York State, plays a vital and important function in promoting economic development and encouraging business investment and job creation, including in areas in need of revitalization. On occasion in the past, ESD also has been criticized for a lack of meaningful engagement and transparency. Unfortunately, the latter has been on display in relation to the Belmont Park Redevelopment Project. This is coupled with a fundamentally flawed DEIS that, by any objective measure, fails to include vital information to allow the public to fully understand the project’s impacts and fails to properly analyze the project’s impacts in key areas resulting in a gross understatement of those impacts. Despite these shortcomings, the DEIS still could not hide the reality that the project will cause significant adverse environmental impacts in the communities surrounding the project, particularly in the areas of traffic congestion and degradation of local community character. (VFP_2547)

Response 1-140: The EIS analyses are consistent with the Final Scope of Work and SEQRA requirements, and discloses the potential significant adverse environmental impacts of the Proposed Project and identifies specific mitigation measures. Community concerns regarding specific impact areas are addressed within each technical subsection of this chapter and additional information and analyses that pertain to these public comments are presented in the FEIS.
Comment 1-141: The DEIS’s disclosure and assessment of the project’s offsite work requirements are inadequate. The DEIS offers minimal information relating to offsite work. At present minimal information is provided and therefore aspects of the project are not even analyzed. Areas requiring additional description and analysis include off-site work pertaining to electricity, water supply and water discharge utilities. These issues are either barely mentioned and/or not assessed in terms of construction impacts, such as temporary partial or complete road closures that will impact Floral Park residents, schools and businesses. (VFP_2547)

Response 1-141: The DEIS has been updated to include as part of the FEIS additional information on off-site work requirements for Project infrastructure; please see Chapter 3, “Community Facilities and Utilities,” and Chapter 15, “Construction,” of the FEIS.

Comment 1-142: The environmental review process must follow SEQRA. SEQRA regulations, specifically Code Rules and Regulations, Part 617.1, require that agencies determine whether the actions they directly undertake, fund or approve may have a significant impact on the environment, and if it is determined that the action may have a significant adverse impact those agencies must prepare a request that issues the scope, study and that the SEQRA process be followed. (Alfonsi_2540, Baggott_2331, D'Agostino_TS1_884, McEnery_2352)

Response 1-142: The environmental review process for the Proposed Project complies with all SEQRA requirements.

LAND USE, ZONING, AND COMMUNITY CHARACTER

LAND USE

Comment 2-1: The Proposed Project will have an adverse impact on the surrounding residential land uses; unlike Uniondale, here we are surrounded by residents. (Amato_TS1_846, MacDonald_2354)

Response 2-1: A comparison of Nassau Coliseum and the Uniondale area to the Proposed Project is not relevant to the analysis. The EIS considers potential environmental effects of the Proposed Project on the residential area immediately adjacent to the Project Sites and the North, East and South Lots. It is noted that there is a residential neighborhood located directly across from the main entrance to Nassau Coliseum on the south side of Hempstead Turnpike.

The southern portion of the Project Site (proposed to contain the majority of the retail development) is bordered by single-family residences to the east. There are no residences adjacent to the portion of the East Lot that is proposed for parking, and while there are residences near the southern portion of the North Lot, they are separated by a vegetated buffer.
Overall, the EIS found that the Proposed Project would have no significant adverse environmental impacts on the nearby residences with the exception of impacts related to transportation and construction-period transportation and noise. Mitigation measures to reduce or eliminate these impacts to the maximum extent practicable have been developed and are included in Chapter 17, “Mitigation,” of the EIS.

Comment 2-2: If the Proposed Project induces major land use affecting north, south, and east lots, why does the DEIS only focus on the original 43 acre site? Why are the north, south, and east lots considered secondary study areas? (VFP_2548)

Response 2-2: The EIS analyses do not focus exclusively on the 43-acre area that is proposed to be leased (Sites A and B); study areas beyond Sites A and B (which contain the Proposed Project components) were established that include the North, East, South Lots and other areas directly affected by the Project, including sensitves uses within close proximity to those areas. The environmental setting as well as the potential for impacts of each environmental topic on these other directly affected areas have been analyzed under each environmental topic in the EIS.

Comment 2-3: The DEIS states that the Proposed Project provides land uses that fit well within the existing Belmont Park property and community. (Page 2-2) The introduction of land uses (i.e., arena, hotel, retail development) as part of the Proposed Project are at an intensity that is greater than the existing intensity of development of the surrounding community. How will the established uses (residential, neighborhood commercial) surrounding the project site be protected from shouldering the impacts of higher intensity development at the project site? (Curran_2564)

Response 2-3: The arena, hotel, and office uses, as well as portions of the retail and the community space, would be located along the north side of Hempstead Turnpike at a significant distance from the nearby residential neighborhoods. Where there is a greater potential for impact on residential neighborhoods, the project design and program incorporate measures to minimize impacts to the surrounding communities from the Proposed Project. For example, Chapter 1, “Project Description,” of the FEIS provides additional detail on Project security including maintenance measures and a “no tailgating” prohibition in the parking lots. Chapter 2, “Land Use, Zoning, and Community Character,” notes that the main retail building on Site B would be 1 to 2 stories in height and would be designed to complement the scale of adjacent residences. The EIS also describes the vegetated berm that would be created along the east side of Site B, separating the property from the adjacent residences in order to minimize visual, noise and lighting concerns. Chapter 2 notes that the hotel would
not be directly adjacent to any residential neighborhood and would be located along a major commercial thoroughfare. It is noted that hotels are permitted south of Hempstead Turnpike in the HT-E, HB District and a hotel at that location would be closer to residences than the proposed hotel on the north side of Hempstead Turnpike. Chapter 2 notes that the landscaped buffers are proposed to be installed along portions of Hempstead Turnpike and the ramps to the Cross Island Parkway on Site A. According to Chapter 7, “Socioeconomic Conditions,” the Proposed Project would increase commercial investment in the immediate study area, drawing direct investment through building construction, enhanced retail activity and destination shopping, increased event-based economic activity, and office, and community space activities. Please also see the response to Comment 2-1.

RELEVANT POLICIES AND COMPREHENSIVE PLANS

Comment 2-4: The DEIS is inconsistent with the 2008 Elmont Community Vision Plan regarding the area. (BPCC_132, Culotta_2365, Culotta_2572) There is no discussion of how the project fits in with the cited vision plans. (VFP_2548)

The DEIS states that the Proposed Project components are consistent with uses identified in plans and studies conducted for the area, such as the 2008 Elmont Community Vision Plan and Nassau County Comprehensive Plan and Updates that advocate redevelopment of underutilized properties in the area, including Belmont Park (Page 2-29). Please specify the uses identified in both plans that are consistent with the Proposed Project, and are these uses at a similar intensity as proposed in the Proposed Project? (Curran_2564)

Response 2-4: As described in Chapter 2, “Land Use, Zoning, and Community Character,” while not all of the uses identified in the 2008 Elmont Vision Plan are captured in the Belmont Redevelopment, one of the Key Elements under the plan’s “Economy” discussion was to “attract businesses that...could benefit from proximity to this major attraction [Belmont Park] including the redevelopment of the parking lot and adjacent areas south of Hempstead Turnpike across from Belmont Park with a hotel, restaurants and quality retail.” While the proposed hotel would be located on the north side of Hempstead Turnpike, restaurants and quality retail are proposed for the south side, consistent with the 2008 Elmont Vision Plan. Also, another one of the “Community Identified Objectives” of the 2008 Elmont Vision Plan was to attract “year-round” businesses that build upon and complement the presence of Belmont Park as an economic generator. The proposed uses in the Belmont Redevelopment are “year-round” uses and as demonstrated by the
socioeconomic analysis, would build upon the “economic engine” of Belmont. Furthermore, elements of the Elmont Vision Plan have been effectuated by establishment of the Hempstead Turnpike – Elmont (HT-E) zoning district under Article XL, Section 409 of the Town of Hempstead Building Zone Ordinance (BZO). Section 409. D. of the BZO notes that although Belmont Park currently is zoned for residential uses, it “is owned by the State of New York.” The provision further notes that “[s]hould such property be subject to the zoning jurisdiction of the Town of Hempstead, consideration shall be given to creating a new Gateway Zone [within the HT-E] that generates jobs and property tax revenue and considers the area’s preference for the property as set forth in the Vision Plan. Such a zone could permit a mixture of uses, including, but not limited to, hotel, entertainment, related commercial, and any uses ancillary to the racing uses at Belmont Park.”

Site B (but not Site A) is mapped for inclusion in the Gateway Zone (identified in the BZO as the “Hempstead Turnpike–Elmont, Gateway Subdistrict”). However, there are presently no regulations governing sites included in the Gateway Zone. The uses included in the Proposed Project align with those expressed in the BZO and the Elmont Vision Plan for the Gateway Zone.

The 1998 Nassau County Master Plan does not specify uses for Belmont Park, only that it is an underutilized parcel that is ripe for redevelopment. In addition, both the 2003 and 2008 Master Plan updates do not discuss Belmont. However, page 48 of the 2010 Draft Master Plan—which has not been approved by the County—discusses the plans for the State-owned 36 acres at Belmont and potential uses for them, including a “racino” (which was removed from the most-recent RFP), mixed use retail with senior housing (residential was completely removed from consideration), and hotel, retail center, sports facility and recreational opportunities, which are still included.

With respect to intensity, neither the Elmont Vision Plan nor the Nassau County Master Plan or Updates provide detail as to the level of development that should be encouraged at the Project Sites.

**Comment 2-5:** The project is in conflict with the Nassau County Master Plan. (Bambrick_TS1_875, BPCC_132, Culotta_2572)

**Response 2-5:** The 1998 Nassau County Master Plan does not specify uses for Belmont Park. However, as discussed in EIS Chapter 2, Page II-10 of the 1998 Plan states that “one of the concepts included this Comprehensive Plan which may not be reflected on the Comprehensive Plan Map is the potential for redevelopment or reuse of vacant and underutilized parcels” The paragraph goes on to say that since the County is primarily built out,
one of the ways to create mixed use development is to redevelop underutilized parcels. “Redevelopment is a concept which refers to taking a property with existing buildings and/or other infrastructure, which is vacant, underused or unimproved, and developing new uses and activities on the site.” Belmont Racetrack is among the underutilized parcels that was identified by the County as being ripe for redevelopment. In addition, Appendix page B-9 of the plan recognizes that Belmont Racetrack is one of a “number of significantly-sized parcels in the County which have considerable redevelopment potential.” The Master Plan generically notes that “many of these properties could result in substantial increases in development which could have significant impacts on communities within which they are located.” However, the analyses conducted as part of this environmental review process did not identify significant adverse environmental impacts with the exception of transportation and construction-period transportation and noise. Mitigation measures (discussed in Chapter 17, “Mitigation”) have been developed to address these impacts. Unavoidable adverse impacts that remain are discussed in Chapter 18 and include transportation and construction noise. As indicated in Chapter 18, these significant adverse impacts cannot be fully mitigated while still allowing the Proposed Project to meet the State’s development objectives for the Project Sites.

Both the 2003 and 2008 Master Plan updates do not discuss Belmont Park. However, the 2010 Draft Master Plan discusses plans for the State-owned 36 acres at Belmont and potential uses for them, including a “racino” (which was removed from the most-recent RFP), mixed use retail with senior housing (residential was completely removed from consideration), and hotel, retail center, sports facility and recreational opportunities, which are still included. Overall, the adopted Nassau County plans are not specific with respect to the development or redevelopment of Belmont Park. The only acknowledgement is that Belmont Park is a site that has the potential for redevelopment. The 2010 Draft plan specifically acknowledges plans to redevelop the Belmont Park area (on both sides of Hempstead Turnpike).

Comment 2-6: The statement in the No Build section is misleading. Without ESD’s proposal, there would still be potential for smaller development that would better fit with the goals and vision of Nassau County. (Culotta_2365)

Response 2-6: The “No Build” or “Future without the Proposed Action” sections of the EIS describe known projects that are anticipated by the 2021 analysis year. Currently there are no other plans for redevelopment of the Project Sites. For purposes of environmental review it is conservative to assume no development on the Project Sites, as that generates a larger project
increment for impact analysis than assuming smaller development projects in the interim. In addition, Chapter 16, “Alternatives,” of the FEIS considers alternatives to the Proposed Action that would result in lesser development on the Project Sites.

Comment 2-7:

The DEIS falsely claims the project is consistent with regional planning policies. The project is not consistent with the Nassau County Comprehensive Plan at all. The DEIS (at p 2-13) tries to bootstrap support for this project from the fact that the 1998 Nassau County Master Plan listed Belmont as an “underutilized property” that could potentially be redeveloped. However, the redevelopment that the Nassau County Master Plan identified as a potential at Belmont was redevelopment as new housing and mixed uses (Nassau County Master Plan at II-10). Mixed use residential redevelopment is entirely consistent with the existing Town of Hempstead Zoning for this property, which provides for a business development for a 100 foot depth along Hempstead Turnpike and then 6000 square foot residential parcels beyond that. That intensity of development under the Town of Hempstead Zoning provisions is nowhere near the excessive over intensive development proposed by this project....nowhere in the Nassau County Master Plan is it suggested that Belmont, or any other underutilized property, should be redeveloped as a shopping mall. A stated overarching goal of the 1998 Master Plan was to foster, protect and revitalize the small local downtowns, referred to as “centers” in the 1998 Master Plan. Both Floral Park and Elmont are identified in the 1998 Nassau County Master Plan as having centers that the Master Plan sought to foster and protect (Nassau County Master Plan Map). The Nassau County Master Plan states “the concept of centers is an integral component of this Comprehensive Plan since it focuses attention on restoring vitality and maintaining the diversity of uses in downtowns” (NC MP II-3). In fact, the 1998 Nassau County Master Plan specifically identifies shopping malls as impacting downtowns and centers throughout the County (NC MP VI -13). In cautioning against shopping malls and their negative impact on local downtowns, the 1998 Master Plan warns: “Today, the limitations of automobile dependent land use patterns are all too clear” and points to the traffic congestion caused by such use (NC MP IV-1). [emphasis added]. Consequently, the ESD cannot plausibly claim that the 1998 Nassau County Master Plan supports this proposal to place an automobile dependent shopping mall at Belmont.

Response 2-7:

Chapter 2, “Land Use, Zoning, and Community Character,” addresses the Proposed Project’s consistency with relevant comprehensive plans. As indicated on page II-10 of the 1998 Nassau County Master Plan, “since many communities in the County are primarily built-out, one of the opportunities to create new housing and mixed uses is in the
redevelopment of vacant or underutilized parcels. Redevelopment is a concept which refers to taking a property with existing buildings and/or other infrastructure, which is vacant, underused or unimproved, and developing new uses and activities on the site.” [emphasis added]. The Proposed Project is a mixed use redevelopment that provides new uses and activities on the site. The creation of new housing is cited as only one potential element of redevelopment, not the only element of redevelopment. Please also see the responses to Comments 2-5 and 2-4.

With respect to the Proposed Project’s effects on downtown commercial businesses, Chapter 7, “Socioeconomic Conditions,” includes a detailed analysis of potential competitive effects on existing local area retail businesses. That analysis found “leakage” of expenditure potential within the local market, meaning that there is more consumer expenditure available than is currently being captured by local retail establishments. For additional detail see response to Comment 7-15 and Chapter 7, Section H, “Detailed Analysis of Indirect Business Displacement due to Potential Competitive Effects.”

Comment 2-8: There needs to be a master plan for Belmont Park where NYAP’s current and future plans are clearly mapped out. (McEnery_2340, VFP_2548)

Response 2-8: NYAP’s development plans are limited to Sites A and B and would be governed by the GPP.

Comment 2-9: This is not a Smart Growth project. (Alexander_TS1_887, VLI_2125)

Response 2-9: A draft Smart Growth Impact Statement (SGIS) was provided in the DEIS and the Final SGIS has been included in the FEIS in Appendix H, “Smart Growth Impact Statement.” Based on the 11 criteria cited in the SGIS, the Proposed Action is consistent with New York State’s Smart Growth Infrastructure Policy Act.

ZONING

Comment 2-10: The Proposed Project would not be in compliance with local zoning. Permitted density of development under Town of Hempstead zoning provisions is nowhere near the excessive and over intensive development proposed by this project. Why can’t this project be reduced in size and scope so this project can at least be much more in conformity with the development intensities permitted by the Town of Hempstead Zoning Codes. (Bambrick_TS1_875, Bambrick_TS3_948, BPCC_132, Fitzgerald_TS1_857, Fitzgerald_TS1_857, VFP_2548)

Response 2-10: As described in Chapter 2, “Land Use, Zoning, and Community Character,” Belmont Park and its associated buildings do not currently conform to the local zoning regulations; Belmont Park is permitted to
operate as a pre-existing, non-conforming use because it pre-dates zoning in this area. Furthermore, Belmont Park is a State-owned property that is exempt from the zoning requirements of the Town of Hempstead. ESD has considered local zoning requirements and has included in the adopted GPP a finding that it would not be feasible or practicable for the Proposed Project to comply with them.

Comment 2-11: If the project does not conform to the current land use (residential) how can ESD justify the project in this area? Using the racetrack grandstand as an example is circumventing the spirit of the land use. The grandstand and racetrack existed before zoning laws. Current zoning laws are to protect against overdevelopment. (VFP_2548)

Response 2-11: As indicated in Chapter 2, “Land Use, Zoning, and Community Character,” Section C, current zoning requirements do not apply to the use of the property (Site A) that has been established on the site for over 110 years. The use that is being proposed is aligned with the existing use of the property more than what the Town of Hempstead zoning would allow if it were to apply to the Project Sites (6,000-square-foot residential lots). With respect to Site B, as described in Chapter 2, the underlying zoning allows commercial development along Hempstead Turnpike and residential development to the south of that road. As described in Chapter 2, the BZO contemplates creating the Hempstead Turnpike–Elmont, Gateway Subdistrict (which currently appears on the Town’s zoning map as a subdistrict of the HT-E District) in this area in the event Belmont Park were to become subject to the Town’s zoning jurisdiction. The uses anticipated under such circumstances would be the type of development that would foster economic development, including hotels, entertainment uses, high quality retail and restaurant uses, and uses ancillary to Belmont Park.

Comment 2-12: Urges the state not to override local building ordinances and codes (Town of Hempstead’s Building Code Ordinance). Any development on the Belmont site should fit within the nature of the local community, not destroy it with significant adverse impacts that it cannot mitigate. (Culotta_2365)

Response 2-12: The entire Belmont Park property is currently subject to the New York State Fire Prevention and Building Code with OGS acting as the permitting authority. The Proposed Project would remain subject to that code and OGS would continue as the permitting authority.

Comment 2-13: Why has the GPP been designed with the need to override Town of Hempstead Zoning ordinances? The project going forward is designed to
usurp the protections of local zoning. (Culotta_2572, Culotta_2365, EAM_2563, VFP_2548)

UDC Act § 6266(3) allows ESD to override local zoning requirements, but only to the extent compliance is “not feasible or practicable.” Instead of reducing its size, ESD has allowed the NYAP project to grow in an unrestrained manner. This cannot be what the Legislature intended based on the plain text of the UDC. UDC Act § 6266(3) also explicitly gives local planning boards and commissions authority to weigh in on the Proposed Project by recommending approval, modification or disapproval. This raises a question: Has ESD engaged directly with any of these boards and commissions in a meaningful way to ensure that they understand their role and authority under the UDC Act, or has there been a lack of transparency in the process in the hope these boards and agencies will not weigh in at all? Floral Park has seen no indication that ESD has followed the former path. (VFP_2547)

ESD has offered no justification to override local zoning bulk restrictions. Beyond overriding use restrictions, the DEIS acknowledges zoning restrictions pertaining to height, density, coverage and setbacks, parking, signage, lighting, stormwater management, and fencing are to be overridden as well. DEIS at 2-33. All of these requirements are established to ensure that development proceeds in a manner that is consistent with the intent for the specific parcels and is compatible with existing development in the surrounding areas, including Floral Park. The level of override, in many instances, can only be described as extraordinarily excessive and constitutes a direct assault on sound planning practices and on the residences surrounding Belmont Park. Pursuant to Section 6266(3) of the Urban Development Corporation Act, an override is allowed only to the extent compliance is “not feasible or practicable.” Other than accommodating a project that obviously is oversized, the DEIS offers no justification for these overrides. A different or smaller project could have either avoided the need for overrides or minimized the extent of the overrides. (VFP_2547)

Response 2-13:

Pursuant to the Town of Hempstead Building Zone Ordinance (BZO): (i) the Project Sites are generally zoned Residence B District; (ii) Site B’s Hempstead Turnpike frontage is zoned Business X District for a depth of 100 feet; and (iii) Site B is mapped as part of the Town’s Hempstead Turnpike–Elmont District, Gateway Subdistrict (HT-E, G), for which there are currently no regulations.

The Residence B District permits single-family detached dwellings, senior residences, agriculture or nurseries, municipal recreational uses, railway passenger stations, and customary and incidental accessory uses.
The regulations of this district impose dimensional requirements that are suitable for these limited permitted uses.

The Business X District permits single-family and two-family detached dwellings, clubs, fraternity houses and lodges, philanthropic uses, hospital, sanatoriums and dormitories, music and dance schools, agriculture, greenhouses and nurseries, municipal recreational uses, railway passenger stations, office, banks and financial institutions, retail stores, restaurants, carpenters, furniture repairs, metalworking, plumbing, pet shops, jewelers, undertakers and embalmers, and customary and incidental accessory uses. The dimensional requirements applicable to the Business X District are suitable for the uses permitted in that district.

Neither the Residence B District nor the Business X District permit the arena or hotel use that are part of the Proposed Project. While retail uses are proposed on Site B, they are located almost entirely within the portion of the site zoned Residence B. The dimensional requirements of the Residence B and Business X Districts do not the permit development at the scale that is proposed. For these reasons, compliance with the local zoning requirements is not feasible or practicable. ESD’s override of those sections of the BZO and Hempstead Town Code that are inconsistent with the Proposed Project is authorized by the UDC Act.

The UDC Act allows ESD to override local zoning requirements where compliance therewith is “not feasible or practicable” and, instead, to regulate development by imposing design guidelines in the general project plan for a project.

The BZO acknowledges the Town’s limited zoning jurisdiction over the State-owned lands that comprise Belmont Park:

“Belmont Park, which is owned by the State of New York and which includes both the racetrack and associated parking fields, is currently zoned B Residence and shall remain zoned as such until the Town of Hempstead acquires zoning jurisdiction. Should such property be subject to the zoning jurisdiction of the Town of Hempstead, consideration shall be given to creating a new Gateway Zone that generates economic development through jobs and property tax revenue and considers the area’s preference for the property, as set forth in the Vision Plan. Such a zone could permit a mixture of uses, including, but not limited to, hotel, entertainment, related commercial, and any uses ancillary to the racing uses at Belmont Park. BZO § 409(D).”

As detailed in the response to Comment 1-2, ESD has engaged directly with representatives of the Town of Hempstead, including the Town Supervisor. ESD has also discussed the Proposed Project and the
approval process under the UDC Act with elected officials and other representatives of surrounding municipalities and with local community organizations.

COMMUNITY CHARACTER

Comment 2-14: There will be adverse impacts to community character due to the noise, litter, pollution, etc. from the crowds that the project is expected to draw. (Browne_TS1_853, Compo_010, Kaminsky_TS1_845, Mesnick_TS1_870, Mullen_TS2_898, Weickert_TS1_869)

There will be adverse impacts on community character due to building massing, traffic, noise, etc. (Brush_130, Colgan_2542, Fitzgerald_TS1_857, Form Letter 6, Gayron_FL6_110, Giraldo_035, Gribbins_TS2_907, Sferlazza_2263, Solages_TS1_855, Sullivan_2359, VFP_2548)

There is concern that Floral Park will be overburdened by the project. (Trentacoste_TS2_902)

We object to the Proposed Project due to overwhelmingly negative impacts that it would cause to the quality of life in the area due to unmitigated increased traffic, litter, loitering, overuse of infrastructure, and other ways with few benefits in terms of tax offsets, high paying jobs, and increased recreational assets. (Anna_055, Anskat_2397, BPCC_2085, Brown_TS2_928, Brown_TS4_974, Brush_130, Chakery_2260, Chiara_TS3_960, Chu_093, Cotlia_TS3_947, Cuite_TS4_984, D'Agostino_TS1_884, DAmico_088, Form Letter 5, FPBPTA_2226, Gayron_TS4_991, Greene_TS2_924, Hargett_023, Hellenbrecht_BCCA_052, Hellenbrecht_TS4_996, Jacob_TS3_954, Juliano_TS2_915, Longobardi_TS1_856, Longobardi_TS4_1029, Lyons_FL5_038, MacDonald_2354, Mannie_2543, Marcelin_TS3_964, McClintock_TS3_958, McEnery_2392, McGovern_2322, McGowan_TS1_864, McGuire_TS2_912, Mesnick_2237, Mezzetti_100, Morgo_2241, Pedley_TS4_993, Ragusa_2069, Rakowski_TS2_909, Sferlazza_2263, Smith_2570, Spina_085, Vallone_2261, Viscovich_096, Wagner-Tyson_TS2_918, Weickert_TS1_869, Weiner_SSAS_2097)

Response 2-14: Chapter 2, “Land Use, Zoning, and Community Character,” presents an analysis of community character that considers the collective effects from an array of potential areas such as land use and zoning, visual resources, noise, historic and cultural resources, socioeconomic conditions, and transportation. While the EIS identifies some unmitigated impacts resulting from the Proposed Project, such as impacts on transportation and temporary noise impacts due to construction, these project effects do not individually or collectively contribute to significant adverse
community character impacts because much of the expected change would be positive, including the revitalization of a once-vibrant Belmont Racetrack site.

There are certain traffic impacts that have been identified as significant, and mitigation measures have been developed to address such impacts to the maximum extent practicable (see Chapter 17, “Mitigation”). Litter, loitering and security within the area of development would be handled by the entity responsible for each project component (e.g., the arena, the hotel, the retail facilities), as described in Chapter 2. It is also noted that problems related to litter, loitering and security detract from the enjoyment and economic success of the venues, so it behooves the Applicant and operators to plan and manage these concerns. With respect to infrastructure, the Proposed Project has been granted a letter of sewer availability (collection system and sewage treatment plant) by NCDPW (see correspondence in Appendix D, “Water Resources”), and NYAP is working with WAWNC regarding the necessary infrastructure to provide potable water. As detailed in Chapter 7, “Socioeconomic Conditions,” it is estimated that the Proposed Project would generate over 9,000 temporary construction jobs and over 3,000 direct, indirect and induced permanent jobs. As stated in Chapter 4, “Open Space and Recreational Resources,” the Proposed Project would introduce new publicly accessible open spaces to Belmont Park, including approximately 2.0 acres of hard- and soft-scaped plazas on Site A, and an approximately 3.75-acre landscaped open space with walking paths on Site B, along the southern and eastern boundary. In addition to the proposed on-site open space, NYAP has committed to working with ESD and local officials and community stakeholders, including the Town of Hempstead, to make improvements to the Elmont Road Park and Hendrickson Avenue Park.

**Comment 2-15:** The project will have a negative effect on community character due to disinvestment when the project fails. (Weiner_SSAS_2097)

**Response 2-15:** The project is expected to bring economic activity/investment and additional jobs to an underutilized property, as discussed in Chapter 1, “Project Description,” and Chapter 7, “Socioeconomic Conditions.” As noted in Chapter 1, the Proposed Project would benefit the local community by providing new retail, hospitality and entertainment and a substantial number of employment opportunities available to the surrounding community. Aside from new jobs, the Proposed Project would include community benefits such as mass transit improvements, community space, new tax revenue and upgrades to Elmont Road Park and Hendrickson Avenue Park, which constitute a long-term investment in the community. See the response to Comment 1-67 regarding the potential results of lease termination.
Comment 2-16: The project does not conform with the character of the surrounding suburban communities due to its large size/scale. (Bambrick_TS1_875, Culotta_2572, Dobson_TS2_916, Fitzgerald_TS1_857, McEnery_2336, Morgo_2327, Sferlazza_2263)

Response 2-16: The Proposed Project is located adjacent to the Belmont Park Racetrack, a large-scale racetrack and entertainment facility, and associated facilities that have been operating at this suburban site in co-existence with the surrounding area for over 100 years. The Town of Hempstead’s Hempstead Turnpike – Elmont zoning district recognizes that the area around Hempstead Turnpike should be thought of as an economic generator and gateway into Nassau County. As such the zoning contemplates the type of development that would foster economic development, including hotels, entertainment uses, high quality retail and restaurant uses, and uses ancillary to Belmont Park. Although many of the proposed buildings are at a different scale than those in the surrounding areas, they are located along a major County roadway, at the interchange of a Parkway, and proximate to public transportation. See the response to Comment 2-14 regarding massing of proposed buildings associated with Site B.

Comment 2-17: There is concern that the project will impact the small town quality of Floral Park. (Culotta_2572, Form Letter 5, Lyons_FL5_038, MacDonald_2354, McGeever_2555, Solages_2402)

Response 2-17: Belmont Park has existed in its current location since 1905 and the Village of Floral Park was incorporated in 1908. Therefore, the Village and Belmont Park have essentially grown together over the last century. While the EIS discloses that the Proposed Project would have certain traffic and other impacts on the Village of Floral Park, the Project Sites are actually located in the hamlet of Elmont, Town of Hempstead. All of the proposed development is located along Hempstead Turnpike. On the north side of this roadway, the proposed new development does not extend north or northeast of the Grandstand. The North Lot and the East Lot are the areas located closest to the Village of Floral Park boundaries. These lots include a number of current operations associated both with Belmont Park and external (rental) operations. These lots are actively used, and many of the operations occur overnight and early in the morning.

Comment 2-18: There will be adverse impacts on community character due to tailgating. (Colgan_2542, Gayron_TS4_991, Reed_TS2_932)

Response 2-18: No tailgating would be permitted in the parking lots.
Comment 2-19: Are the North, South, and East lots currently illuminated every day from dusk until dawn? If not, how can the DEIS justify that this will have no impact on community character? Also, how does the DEIS not study the impacts these lots will have on community character with their more frequent use? Why does the DEIS not address the community character of the areas immediately abutting the north and East Lot? (VFP_2548)

Why doesn’t the change from passive (existing) use of the North and East Lots to an active (new) use constitute a substantive change? On p. 2-37 it states that noise is not expected to affect the character of communities adjacent to the North and East Lots. How can this be true if the lots are changing from passive to active? (VFP_2548)

Response 2-19: Chapter 6, “Visual Resources,” discusses the proposed lighting for all portions of the Project Sites and other directly affected areas, by specific area, under the subheading of “Assessment of Proposed Lighting Schemes.” The “Surface Parking Lots” subsection discusses the proposed lighting and potential impacts in the North and East Lots, concluding that the Proposed Project would not result in light spill-over in the Floral Park residential streets, and would not adversely impact residential streets in the neighborhood. Further, the Floral-Park-Bellerose School is primarily active during the daytime, when the proposed lighting would not be in use. Therefore, there would be no significant lighting impact to the school.

Chapter 2, “Land Use, Zoning, and Community Character,” addresses the community character in the areas abutting the North and East Lots. As described in Chapter 2, the North Lot would be used more frequently for active parking during events, and new fencing, evergreen trees, and other landscaping along the northern/northeastern boundary of the North Lot would be installed to screen and soften the buffer and reduce visibility. In addition, although Belmont Park is visible from the Floral Park-Bellerose School, the Proposed Project would be located far enough away from the school that visibility would be minimal. Moreover, a landscaped buffer would be created between the school and the North Lot. Additionally, noise is not expected to affect the character of the communities adjacent to the North Lot and the East Lot, as no significant adverse impacts are anticipated.

The North and East Lots are currently active, not passive. Some of the uses operating on the lots and their associated level of activities were discussed in Chapter 2, Section C, and Chapter 3, “Community Facilities and Utilities,” Section C. Additional research and conversations were held with NYRA Facilities to further confirm that both the North and East Lots are currently active lots used frequently within Belmont Park.
Comment 2-20: The North Lot is in relatively close proximity to a residential neighborhood to the east and will be used at a much greater intensity level than what currently exists. How will the impacts from the North Lot be mitigated so as not to impact quality of life for these residents? (i.e., lighting, noise, fumes, litter). (Curran_2564)

Response 2-20: The EIS assesses the potential for significant adverse environmental impacts on residential and community facility uses (i.e., Floral Park Bellerose School) with respect to lighting, noise, air quality, land use, and community character. For residential areas within closest proximity to the North Lot, the EIS analysis did not find the potential for significant adverse impacts. Even though no significant adverse impacts are identified in the EIS, the EIS identifies adverse effects on the surrounding community, and the FEIS contains more detailed description of specific project measures to minimize those impacts. Please also see the response to Comment 2-14.

Comment 2-21: If any resident ever said they wanted a buffer between them and their neighbors but wouldn't tell their neighbors or the zoning board how large it would be, what kind of landscaping would be part of it, and what the fence would look like, the request would be denied. (McEnery_2340)

Response 2-21: As described in Chapter 1, “Project Description,” of the FEIS, the Proposed Project would incorporate a buffer composed of a hedgerow (at least 8 feet in height) with dense evergreen vegetation along a new replacement fence (between 8 and 12 feet in height) with privacy screening along the northeastern boundary of the North Lot to shield the Floral Park-Bellerose School recreation space from parking activities in the North Lot. Additional fencing with privacy screening would be provided by NYAP along Belmont Park Road from approximately Crocus Avenue to Mayfair Avenue to shield the adjacent Floral Park neighborhood from parking activities in the North Lot. Please also see FEIS Figure 6-70 for a visual depiction of the North Lot buffer from the Floral Park-Bellerose School recreation space.

The proposed landscaped berm would create a visual and acoustic separation between the residential streets in Elmont and the Proposed Project on Site B. The approximately 8-foot-tall berm would have a minimum width of 50 feet, and would be landscaped with hedges and trees. This wide berm would shield the perimeter roadway from view of the neighboring residential properties to the east of Site B.

Comment 2-22: A project of this magnitude will significantly increase traffic congestion and overwhelm the local road system, resulting in far ranging impacts on the surrounding neighborhoods and destroying the character of these unique communities. (Culotta_2365, VFP_2548)
Response 2-22: The EIS analyses disclose the potential significant adverse traffic impacts of the Proposed Project. Specifically, the impacts of traffic overall and on the local road system were examined in Chapter 11, “Transportation,” and Chapter 17, “Mitigation.” As detailed in Chapter 17, the majority of the intersections with significant adverse traffic impacts could be fully mitigated via implementation of standard traffic engineering improvements such as: the installation of new traffic signals at currently unsignalized intersections, modification of signal phasing and timing at currently signalized intersections, deployment of traffic control personnel before arena events, implementation of turn prohibitions where needed, geometric improvements at specific intersections to provide improved channelization, lane re-striping, and/or new lane designations. With such measures, significant adverse traffic impacts would be fully mitigated at all but three traffic movements at one intersection during the weekday AM peak hour, one traffic movement at one intersection during the weekday PM peak hour, six traffic movements at two intersections during the Saturday Midday peak hour, and two traffic movements at one intersection during the Saturday PM peak hour. Chapter 17 of the FEIS also contains additional, more detailed mitigation measures as part of the Transportation Management Plan (TMP) and the new LIRR Elmont Station that would substantially reduce impacts to local roadways. In addition, the vast majority of traffic generated by the Proposed Project would access the site via the Cross Island Parkway and Hempstead Turnpike, not the local road network.

Comment 2-23: The 435,000 sq ft of retail is inconsistent with the existing land use on Site B and inconsistent with the suburban residential community character. This use is an adverse impact that the DEIS fails to consider. (Culotta_2365)

Response 2-23: Chapter 2, “Land Use, Zoning, and Community Character,” considers the introduction of retail on Sites A and B, and does not find the potential for significant adverse impacts with respect to land use or community character. Furthermore, one of the ‘Key Elements’ under the ‘Economy’ discussion in the 2008 Elmont Vision Plan is to “attract businesses that…could benefit from proximity to this major attraction [Belmont Park] including the redevelopment of the parking lot and adjacent areas south of Hempstead Turnpike across from Belmont Park with a hotel, restaurants and quality retail.” Finally, in response to public comments on the DEIS, the maximum amount of allowable retail under the Proposed Project has been reduced from 435,000 gsf to 350,000 gsf, and the FEIS includes a “No Retail Village Alternative” in FEIS Chapter 16, “Alternatives.”
Comment 2-24: The assessment of the project’s impacts to community character is superficial. SEQRA’s purpose is, among other things, to “prevent or eliminate damage to the environment and enhance human and community resources.” SEQRA further states “the protection and enhancement of the environment, human and community resources shall be given appropriate weight with social and economic considerations in public policy. Social, economic, and environmental factors shall be considered together in reaching decisions on proposed activities.” ECL § 8-0103(7). Case law has long recognized that “neighborhood character” is a physical condition of the environment.

In light of the unmitigated severe impacts to local road networks caused by the project, the assessment to impacts to community character in Chapter 2 of the DEIS is superficial and deficient. (VFP_2547)

Response 2-24: The community character section of Chapter 2, “Lane Use, Zoning, and Community Character,” considered all the various technical areas that comprise the definition of community character, including: land use and zoning; visual resources; noise; historic and cultural resources, socioeconomic conditions; and transportation. Furthermore, each of these topics was examined in detail in various chapters of the EIS. The fact that there are unmitigated impacts in one area of analysis that contributes to community character (in this case, traffic) does not necessarily mean there are significant adverse community character impacts.

As described in Chapter 17, “Mitigation,” of the FEIS, the vast majority of the intersections with significant adverse traffic impacts could be fully mitigated via implementation of standard traffic engineering improvements such as: the installation of new traffic signals at currently unsignalized intersections, modification of signal phasing and timing at currently signalized intersections, deployment of traffic control personnel before arena events, implementation of turn prohibitions where needed, geometric improvements at specific intersections to provide improved channelization, lane re-striping, and/or new lane designations. With such measures, significant adverse traffic impacts would be fully mitigated at all but three traffic movements at one intersection during the weekday AM peak hour, one traffic movement at one intersection during the weekday PM peak hour, six traffic movements at two intersections during the Saturday Midday peak hour, and two traffic movements at one intersection during the Saturday PM peak hour. Chapter 17 of the FEIS also contains additional, more detailed mitigation measures as part of the TMP and the new LIRR Elmont Station that would substantially reduce impacts to local roadways. In addition, most of the traffic generated by the Proposed Project would access the site via the Cross Island Parkway and Hempstead Turnpike, not the local road network.
Chapter 22: Response to Public Comments

Comment 2-25: The section addressing community character opens by inappropriately limiting its scope: “The effect of the Proposed Project on community character would be felt mostly on the residential areas immediately adjacent to the Project Sites, particularly Site B, as there would be a substantial change in land use on that parcel. The activity generated by the arena, hotel and retail shops would be evident along Hempstead Turnpike.” DEIS at 2-35. The DEIS then focuses on visual impacts caused by the project’s structures, ignoring the reality that the density of the proposed development is completely out of place in relation to the surrounding development, much of which is residential. (VFP_2547)

Response 2-25: As described in Chapter 2, “Land Use, Zoning, and Community Character,” the proposed arena, hotel, office and community space on Site A are located along the north side of Hempstead Turnpike, a major New York State east-west roadway. The placement of higher intensity uses along a major roadway is appropriate from a planning, traffic, and community character perspective. Access points associated with the Proposed Project are located either along Hempstead Turnpike or the Cross Island Parkway, not on local roadways.

As noted in response to Comment 2-3, greater density does not in itself suggest incompatibility. The proposed uses are complimentary to the existing NYRA programming, which is a large-scale recreation/entertainment offering adjacent to a residential neighborhood, and which has existed for over 110 years. The response also discusses the measures that have been incorporated to reduce the potential impacts associated with Proposed Project on the neighborhoods surrounding the Project Sites and other directly affected areas.

In many suburban contexts, residential neighborhoods are proximate to adjoining commercial areas. Such proximity does not itself establish incompatibility. The Project Sites are located on land currently dedicated to commercial uses.

Comment 2-26: Belmont Stakes day represents a unique one-day a year event that requires Floral Park to mobilize significantly more police and impose major traffic restrictions. On Belmont Stakes day, attendance is approximately 50 to 90 thousand and the traffic in our Village is so bad that we have to turn Plainfield Ave., a two lane road with one northbound and one southbound lane into a two lane one way northbound street. Then, the DEIS simply asserts that impacts relating to noise and transportation associated with the project will not be significant simply because “the volumes associated with year-round events and other use of the property...would be substantially less than Belmont Stakes day.” DEIS at 2-36. Belmont Stakes Day is not a measure of what should be viewed as acceptable. (VFP_2547)
Response 2-26: The statement in the DEIS regarding the volumes associated with the Proposed Project provides context for the estimated levels of visitation. The adverse neighborhood effects associated with Belmont Stakes Day have been frequently raised by the community in relation to the Proposed Project, so pointing out the differences between Belmont Stakes Day and expected conditions associated with the Proposed Project is important and helpful to respond to community concerns and place potential traffic and associated potential impacts in context. However, a comparison of the relative frequency of visitation and other conditions associated with the Proposed Project against Belmont Stakes Day is not a determining factor for the identification of potential significant adverse impacts. That assessment is based primarily on a comparison of the environmental conditions with the Proposed Project and environmental conditions with No Action. The frequency and amount of cumulative visitation (to all proposed venues on the Project Sites) has been used as the basis for analysis in the FEIS. For more information on the volumes associated with the Proposed Project’s events, please see the response to Comment 1-58.

Comment 2-27: The Proposed Project will have positive benefits on community character and quality of life in the form of jobs, infrastructure improvements, public facilities, and expanded tax base. (Albanese_2304, Kaplan_TS4_967)

Response 2-27: Comment noted.

OTHER

Comment 2-28: The commenter cites an error in Chapter 2 which states that Belmont Park is 430 acres, but in Chapter 6 says it is 650 acres. (Gustavson_TS2_933)

Response 2-28: The current size of Belmont Park is approximately 430 acres. The reference to the current size of Belmont as 650 acres in Chapter 6, “Visual Resources,” (as well as Chapter 5, “Historic and Cultural Resources”) is in error. The original size of Belmont was 650 acres, but it was reduced over the years. The FEIS corrects for this error.

Comment 2-29: What does the word “formalized” mean in the sentence on p. 2-32 and what are the terms of a formalization, "the parking area within the North Lot, which is next to Floral Park-Bellerose Elementary School, would be formalized, and the frequency of its use would increase with the Proposed Project." (VFP_2548)

Response 2-29: The term formalized refers to the proposed resurfacing and restriping of the existing gravel parking lot as well as the installation of lighting by NYAP. The frequency of use of the North Lot for active parking would increase with the Proposed Project, as noted in the comment and in Chapter 2 of the EIS. Ticket booths would be installed at access points.
and parking personnel would be present to help regulate the flow of traffic within the lots. Also, on event days, NYAP would provide a security presence in each of the parking lots, including the North Lot. On non-event days, NYAP would provide regular patrols by on-site security guards in the parking lots. NYAP would have security personnel, signage, and CCTV to monitor and enforce all parking lot regulations, including prohibitions against tailgating and celebratory honking.

COMMUNITY FACILITIES AND UTILITIES

GENERAL

Comment 3-1: Who will pay for the cost of increased municipal services such as police/fire, and sewage/solid waste disposal? Will neighboring residents' taxes increase? There is concern that the project will exacerbate the cost of municipal services resulting in property tax increases. (BPCC_132, Browne_TS1_853, Chatterton_TS2_903, Cheng_TS1_881, Coven_2230, Coven_2231, Culotta_2572, Doherty_TS2_897, Greene_TS3_944, Gunther_TS3_938, Jacob_TS3_954, Malfonsi_2558, McEnery_2352, Mezzetti_100, Moy_148, Nicolello-Muscarella_2107, PCA_020, Reed_TS2_932, Solages_2402, TMCA_024, Walsh_1040)

The DEIS does not properly address the expenses of road maintenance or traffic enforcement in Floral Park. (Coven_2230)

The increase in traffic will result in undue costs for municipal services such as police, EMS, and sanitation. (English-Young_1052)

Response 3-1: The Project Sites are located within the Town of Hempstead and would be served by either the local entities within the Town and/or by Nassau County, depending on the specific municipal service. Police protection services are provided by Nassau County (as well as privately, by on-site security, which would be privately funded), and fire protection would be provided by the Elmont Fire Department although each of the Project components would include fire suppression measures that meet national and local fire life safety codes and that are developed in coordination with the Elmont Fire Department.

The Proposed Project would add new revenue to the municipal tax base. As set forth in the GPP, in the first three years following closing, the Applicant would contribute $50 million towards infrastructure improvements and related mass transit improvements. Thereafter it would continue to make annual payments to ESD following the opening of the train station. The total amount of payments would be approximately $117 million.

All other project costs would be privately funded and borne by NYAP. PILOT and sales tax revenues from the Proposed Project would flow
through the County to local municipalities, including local school districts. Please see the essential terms of the transaction of the GPP.

ESD has prepared an economic impact study entitled, “Fiscal and Economic Benefits of Belmont Park Redevelopment Civic and Land Use Improvement Project,” which shows adequate projected revenues for the Proposed Project (Appendix I of the FEIS).

The individual project components (arena, hotel and retail) would establish security staffing and protocols specific to their needs. Sewage disposal is via connection to the Nassau County Sewer District (for which an availability letter has been received for both the local infrastructure and the sewage treatment facility). Solid waste collection would be performed by a private carter paid for by the various Project components.

**Comment 3-2:** There is no provided confirmation that the necessary parties will fund and install the electrical, natural gas, etc. infrastructure. (Culotta_2365, EAM_2563)

**Response 3-2:** The Applicant is providing funding for installation of necessary on-site infrastructure. That funding would be required under the terms of the lease between ESD and NYAP.

**Comment 3-3:** There is concern over the project’s potential impacts on school from direct effects (e.g., noise, traffic, and lighting). (Chiara_TS3_959)

DEIS states that there would be no direct impacts on schools yet the project would create traffic, noise, air quality, and light impacts adjacent to 2 schools near the North and East Lots. These impacts could interfere with students' use of outdoor fields. I urge ESD to scale back the project to reduce the traffic and to utilize site B for parking. (Curran_2564)

There is concern that the project will have an adverse effect on schools and the community at-large. (FPBPTA_2226, Madden_TS3_956)

**Response 3-3:** The Proposed Project’s potential impacts on the Floral Park-Bellerose School have been fully analyzed in the EIS. As detailed in Chapter 6, “Visual Resources,” of the EIS, lighting within the property would be selected to illuminate parking areas and would have full cut-off luminaires and shielding in order to prevent light trespass onto neighboring properties. The chapter notes that the proposed lighting strategy incorporates best-practices principles related to duration and usage, brightness, orientation, directionality, form, and fixtures that would minimize light pollution. The chapter also describes the lighting for the surface parking lots, indicating that parking field illumination would be controlled by time clock and daylight sensors to operate from dusk to dawn. A lighting control system would provide the ability to
lower light levels after events on site to limit unwanted lighting late at night, but still provide sufficient safety and security lighting. The conclusion of this chapter is that the Proposed Project would not result in any significant lighting-related impacts to aesthetic resources and other locally sensitive receptors within the study area.

With respect to noise, Chapter 13, “Noise,” states that the Proposed Project would not result in total future noise levels at any surrounding sensitive receptors, including the school and nearby residential properties, that would exceed the threshold recommended by NYSDEC. Consequently, operation of the Proposed Project would not result in a significant adverse noise impact at any of the receptors. It is specifically noted that the maximum predicted incremental change in noise levels is 4 dBA, which represents a perceptible change, but is less than the Village of Floral Park and NYSDEC thresholds for significant noise increases. Additional details regarding the minimizing of potential impacts due to projected traffic and those mitigation measures associated with traffic are discussed in Chapter 11, “Transportation,” and Chapter 17, “Mitigation,” respectively, of this FEIS.

A buffer composed of a hedgerow (at least 8 feet in height) with dense evergreen vegetation along a new replacement fence (between 8 and 12 feet in height) with privacy screening would be provided along the northeastern boundary of the North Lot to shield the Floral Park Bellerose School recreation space from parking activities in the North Lot. Additional fencing with privacy screening would be provided by NYAP along Belmont Park Road from approximately Crocus Avenue to Mayfair Avenue to shield the adjacent Floral Park neighborhood from parking activities in the North Lot. Please also see the response to Comment 2-14.

**Comment 3-4:**

The project will have adverse effects on utilities and infrastructure (i.e. expanded roadways, electric and gas grids, sewage, etc.). (Colgan_2542, Ferone_TS2_926, Form Letter 5, Lyons_FL5_038, Milazzo_2203, Palamar_2240, PCA_020, Schlechter_TS3_943, TMCA_024, Venti_009)

I am really concerned about the water, gas etc. issues that have been raised. The surrounding neighborhoods would be severely impacted as would the proposed arena and hotel. (Henry_2301)

**Response 3-4:**

Chapter 3, “Community Facilities and Utilities” indicates that PSEG Long Island identified the need to construct an electrical substation, feeders and transmission lines to adequately serve the Proposed Project. Furthermore, PSEG Long Island indicated in a response letter that service would be provided to the Proposed Project (see Appendix A, “Community Facilities and Utilities Correspondence”). As such, the
Proposed Project would rely on the proposed substation to serve the program components thus, the project would not utilize nor impact off-site electrical facilities. For more information see the “Electrical Supply” section, below.

Regarding sewage generation, the Nassau County Department of Public Works has indicated in a response letter (see Appendix A) that the Nassau County sanitary sewer system and Bay Park Sewage Treatment Plant have sufficient capacity for the anticipated sewage to be generated under the Proposed Project. Thus, the local sewer system would not experience a significant adverse impact due to the Proposed Project. For more information see the “Sewage Disposal” section below.

The Applicant is continuing to consult with the WAWNC to address proposed water supply. WAWNC has stated that it can supply water to the Proposed Project with the installation of a new water main on the south side of Hempstead Turnpike from its existing well near Elmont Road. The effects on the local roadway network have been identified and analyzed in Chapter 15, “Construction.” No roadways are proposed to be expanded as part of the Proposed Actions.

Due to the denial of the Williams Pipeline by New York State, the Applicant has identified and analyzed alternatives for heating. Depending upon the provision of natural gas service to the Proposed Project, the heating sources would be as identified as detailed in Chapter 3, “Community Facilities and Utilities,” of the FEIS and as summarized in response to Comment 3-34.

Comment 3-5: The DEIS Chapter 3, Figures 3-1 and 3-2 left out several community facilities: Our Lady of Victory grammar school, the other two fire houses that serve Floral Park (only the headquarters was mentioned), the playground and athletic fields adjacent to the North Lot. (VFP_2548)

Response 3-5: Figure 3-1 only depicts public schools within the study area. Our Lady of Victory Grammar School is a private school located outside the study area, and therefore, was not included in the analysis or the figure. Furthermore, the playground and athletic fields adjacent to the North Lot are associated with the Floral Park Bellerose School identified on Figure 3-1 as Nassau County Schools Number 1. Figure 3-2 only depicts Fire Department Headquarters and not all fire houses.

POLICE PROTECTION AND SECURITY

Comment 3-6: There is concern that the project will lead to an increase in crime. (Compo_010, Chakery_2260, Colgan_2542, Coven_2231, Jacob_TS3_954, Laguerre_105, Mezzetti_100, Sciara_2233, Sciara_TS2_906, Weissman_TS2_922)
Which agency will be responsible for police service at the North and East Lots? (VFP_2548)

**Response 3-6:**

In accordance with the SEQRA Handbook DRAFT 4th Edition, the potential for “crime, drug problems or psychological stress” to arise from the Proposed Project is “considered arbitrary, discriminatory, or speculative and consequently are inappropriate for inclusion in an EIS” (page 123). Nevertheless, as stated in Chapter 3, “Community Facilities and Utilities,” and the Project Management and Site Security section in Chapter 1, “Project Description,” the Proposed Project includes on-site security. Specifically, it is anticipated that the individual Project components (arena, hotel and retail) would establish security staffing and protocols specific to their needs. In addition, on event days, NYAP would provide a security presence in each parking lot. On non-event days, NYAP would provide regular patrols by on-site security guards in the parking lots. NYAP would have security personnel, signage, and CCTV to monitor and enforce all parking lot regulations, including prohibitions against tailgating and celebratory honking. In addition, a buffer composed of a hedgerow (at least 8 feet in height) with dense evergreen vegetation along a new replacement fence (between 8 and 12 feet in height) with privacy screening would be provided along the northeastern boundary of the North Lot to shield the Floral Park Bellerose School recreation space from parking activities in the North Lot. Additional fencing with privacy screening would be provided by NYAP along Belmont Park Road from approximately Crocus Avenue to Mayfair Avenue to shield the adjacent Floral Park neighborhood from parking activities in the North Lot. The fencing and vegetation would be installed on Belmont Park property. Camera Infrastructure would be set up to monitor potential security threats. The Applicant has been and would continue to coordinate with law enforcement agencies. See also the Operations Plan of the Transportation Management Plan (Appendix J), which discuss crowd and traffic control associated with the parking lots.

**Comment 3-7:**

There is concern about the Project’s potential impacts on the local police. (McEnery_2352, Talty_TS2_929, Weickert_TS2_900, Culotta_TS1_890, McGeever_2555, Sapienza_TS1_873)

There is concern that the project will have adverse effects on police protection. (Chu_093, Mesnick_2237)

The local police force is adequate to handle the Proposed Project. (Higdon_TS2_923)

**Response 3-7:**

The Project Sites are within the jurisdiction of NCPD. NCPD would continue to serve the Project Sites with regard to police protection.
Appendix A of the EIS contains correspondence from NCPD describing the resources that are available to serve the Project Sites.

Further, as stated in Chapter 3, “Community Facilities and Utilities,” and as detailed in the Project Management and Site Security section in Chapter 1 “Project Description,” the Proposed Project would include comprehensive on-site security, including the creation of a command center within the arena. The individual Project components (e.g., arena, hotel and retail) would establish security staffing and protocols specific to their needs, NYAP and NYRA would implement a project-wide security plan in conjunction with the Proposed Project, and on-site security personnel would coordinate with NCPD.

Moreover, on May 17, 2019, a meeting was held at the New York City Police Department (NYPD) to discuss security, emergency response and policing measures associated with the proposed Belmont Park Redevelopment Civic and Land Use Improvement Project. Invitees included representatives from local emergency service providers including police and fire departments from Floral Park, South Floral Park and Elmont, as well as Nassau County. Additional invitees comprised representatives from NYPD (main and Queens South), the New York State Police, New York Office of Emergency Management, Department of Homeland Security and Emergency Services (DHSES), NYRA, the Applicant, the Applicant’s consultants, ESD and ESD’s consultants. Items discussed at this meeting consisted of, but were not limited to: coordination amongst all emergency service providers; central security/joint operations command center at the arena; security measures at the arena and throughout the property; emergency access to the property; security within the parking lots and coordination between NYRA and the applicant; coordination with the Third Track project; presence of at least one ambulance on site during events; and emergency response times on local roadways.

The stakeholders, including the local emergency service providers, would remain engaged throughout the development process regarding security and matters of emergency service provision, and would have a continuing role as stakeholders in the monitoring of traffic (including emergency response time) and parking issues, as well as involvement in potential adjustments to the TMP.

Comment 3-8:

The DEIS analyzes potential impacts on the Nassau County Police Department but not the surrounding local police departments. To mitigate impacts, ESD should require NYAP to provide a regular funding stream to local police departments to ensure that they have the resources necessary to keep their communities safe. The same should be done for local fire departments to ensure that they have the resources needed to
Chapter 22: Response to Public Comments

respond to emergencies at the project site and the surrounding area.
(Culotta_2365)

Response 3-8: See response to Comment 3-1 with respect to funding and the proposed PILOT. Also, see responses to Comments 3-7, 3-9 and 3-13 regarding the responsibilities for provision of emergency services to the Proposed Project.

Comment 3-9: What law enforcement would patrol the Belmont Park campus? Why didn't the project team coordinate with the Village of Floral Park police department? If the FPFD responds to calls on Belmont Park property how would this impact the service of the Floral Park residents? (VFP_2548)

The EIS has not taken into consideration the impact this will have on Floral Park's police department. (Anskat_2397)

ESD should require that NYAP maintain a private security force to patrol the site 24/7. (Culotta_2365)

There is no discussion on the need for additional police staffing to cover the number of events each day. How did ESD come to this conclusion if there will be an additional 30,000 to 50,000 people drawn to the site? (VFP_2548)

Response 3-9: The provision of on-site security and police protection is discussed in both Chapter 1, “Project Description” and Chapter 3, “Community Facilities and Utilities.”

The footprint of the Belmont Arena Project lies in multiple jurisdictions and is policed by multiple agencies. Part of the NYPD Queens Precinct overlaps into the western portion of the Belmont Arena Project as indicated on the attached map. Nassau County Police Department’s Fifth Precinct has geographical responsibility and is considered the lead agency for response to major incidents or major unusual occurrences. A response letter (see Appendix A) was received from NCPD indicating that it has the resources necessary to service the Proposed Project. As such, local police departments such as the Floral Park Police Department are not expected to serve the Project Sites. See also the response to Comment 3-7 for additional information regarding security and police protection. Floral Park residents should not have any impact on calls for service as a result of the Proposed Project, as the major police departments coordinate a multi-agency response to incidents or calls that require additional resources other than planned event and non-event staffing levels.

While the Belmont Park property (including the Project Sites) is not within the jurisdiction of the Floral Park Police Department (FPPD), the project team coordinated with FPPD. As included in Appendix A,
correspondence was sent to Stephen G. McAllister, Commissioner of the FPPD on May 16, 2018. A response was prepared and sent by FPPD on June 25, 2018.

It is also noted that although the Elmont Fire Department is the primary fire protection provider for the Belmont Park property, including the Project Sites, the project team also coordinated with the Floral Park Fire Department (FPFD) and a response from the Fire Department, dated October 26, 2018, is included in Appendix A. The Nassau County Police Department, Police Medics are the first responders for emergency medical services. Although FPFD has responded to fire and medical emergencies within the Belmont Park property in the past (approximately 10 times in the past three years), it would only respond if requested for mutual aid, as Elmont is the primary fire responder. Therefore, the Proposed Project would not directly affect the Floral Park residents with respect to police and fire protection services.

The Fifth Precinct of the NCPD services Belmont Park and surrounding areas and would be the first responder for the Proposed Project after on-site security personnel. In addition to the resources of the Fifth Precinct for patrol, there are various plainclothes and specialized resources that are available to respond to address threats to public safety as well as quality of life concerns. There are no plans to modify or relocate the Fifth Precinct, and the Proposed Project would not displace any police protection facility. NCPD did not express any concerns about its ability to serve the Proposed Project. The Proposed Project, including potential effects on emergency response times, would be taken into consideration during routine evaluations of service adjustments to continue to provide adequate police coverage.

To supplement NCPD, the Proposed Project would implement its own site security plans, which would include measures such as the deployment of security personnel, as well as monitoring and screening procedures. The property operators would coordinate with NCPD and the MTA police (at the LIRR Belmont Park Station and the planned LIRR Elmont Station) to ensure a safe and secure environment.

With respect to Proposed Project visitation estimates, please see the response to Comment 1-58.

**Comment 3-10:** There is concern about the project’s potential impacts on local police due to increased noise complaints. (Doherty_TS2_897)

**Response 3-10:** Noise and noise complaints associated with the operation of the Proposed Project were not identified in the EIS as a significant adverse environmental impact. See EIS Chapter 13, “Noise,” and responses to public comments in the Noise section of this chapter.
Chapter 22: Response to Public Comments

Comment 3-11: The DEIS on page 3-1 states “the Proposed Project is not anticipated to have a significant adverse impact on police protection services.” What information was used to make this decision? There is no discussion on policing at similar venues. (VFP_2548)

Response 3-11: The EIS analysis of police services is consistent with the Final Scope of Work and SEQRA practices. The request to discuss policing at similar venues is not necessary to determine the potential for significant adverse environmental impacts. Please see the responses to Comments 3-9, 3-13, 3-14, and 3-29.

Comment 3-12: What is “security staffing”? Will they be able to enforce the law? Does this site present new risk for terrorism, bomb threats, and mass shootings to Belmont Park? Will this project increase threats to the surrounding community? (VFP_2548)

Response 3-12: The “security staffing” refers to private security personnel who would coordinate with law enforcement agencies, including the Nassau County Police Department and the MTA police (at the LIRR Belmont Park Station) to ensure a safe and secure environment.

NYAP also intends to pursue Support Anti-Terrorism by Fostering Effective Technologies (SAFETY) Act certification by the Department of Homeland Security. Such certification requires that the development include a security command center, annual reporting, and self-testing as well as an integrated operational plan with local, state, federal, and international law enforcement.

As part of that effort, NYAP would develop comprehensive emergency plans prior to the arena opening for (a) fire, (b) evacuation, (c) bomb threats, (d) suspicious packages or letters, (e) medical situations (which shall contain specified emergency facilities and routes from the Arena), (f) Improvised Explosive Devices (IEDs) or Vehicle Born Improvised Explosive Devices (VBIEDs), (g) power failures, (h) severe weather and other natural disasters, (i) active shooter/police response, (j) crisis communications, (k) chemical and biological, radiological, nuclear (CBRN) events, (l) continuity of operations, (m) spontaneous fan civil disobedience, (n) demonstrations, (o) use of drones, and (p) cyber attacks/outages.

Management of major special events as well as crisis response would be conducted under the National Incident Management System (NIMS). A command center would be designed inside the arena to accommodate up to 30 personnel and would be scalable for any event that would be scheduled at the arena.
FIRE PROTECTION AND AMBULANCE/EMERGENCY MEDICAL SERVICES

Comment 3-13: There is concern that the project will have adverse effects on fire protection services. (Anskat_2397, Culotta_TS1_890, Kubler_131, McGeever_2555, Sapienza_TS1_873)

Response 3-13: As stated in Chapter 3, “Community Facilities and Utilities,” the Project Sites are within the jurisdiction of the Elmont Fire Department for fire protection and emergency medical services. A response letter was received from the Elmont Fire Department (Appendix A) indicating that it would continue to provide fire protection and emergency service protection to Belmont Park as well as the Project Sites. NYAP has had several meetings with the Elmont Fire Department, as well as the New York State Office of Fire Prevention and Control (OFPC), which has jurisdiction regarding the requirements for new construction, fire department vehicular and firefighter access to the sites and buildings, fire suppression systems, etc. Each of the Proposed Project’s components would include fire suppression measures that meet national and local fire life safety codes and that are developed in coordination with the Elmont Fire Department.

Local fire departments such as Floral Park and South Floral Park are not expected to serve the Project Sites. However, as identified in Chapter 3, “Community Facilities and Utilities,” the Villages of Floral Park and South Floral Park, along with other local first responders provide mutual aid to the Project Sites for larger firefighting and/or EMS incidents and will continue to do so in the future. It is noted that there would be an ambulance housed on Site A (north side of Hempstead Turnpike) during all events, and an additional ambulance would be available during hockey games for use by an injured player.

Comment 3-14: Floral Park deserves to keep our first responders private to our area. Belmont needs to provide their space with their own team of EMS and law enforcement to keep their crowds under control. (Zoleta_092)

Response 3-14: As stated in Chapter 1, “Project Description,” and Chapter 3, “Community Facilities and Utilities,” of the FEIS, the Proposed Project would include on-site security and a comprehensive security management plan is being developed (see Responses to Comments 1-87 and 3-6). The applicant would provide security personnel, signage, and closed circuit television to enforce all parking lot regulations, including tailgating prohibitions.

Individual Project components (arena, hotel and retail) would establish security staffing and protocols specific to their needs. Further, the Project Sites are within the jurisdiction of NCPD, and not within the Floral Park.
Chapter 22: Response to Public Comments

Police Department jurisdiction. A response letter (Appendix A) was received by NCPD indicating that it would continue to serve the Project Sites with regard to police protection. In addition, the Project Sites are located within the Elmont Fire Department jurisdiction regarding fire protection, and not in the Floral Park Fire Department jurisdiction. A response letter was received from the Elmont Fire Department (Appendix A) indicating it would continue to provide fire protection and emergency service protection to Belmont Park as well as the Project Sites. It was identified in Chapter 3, “Community Facilities and Utilities,” should the need arise Floral Park would provide mutual aid to the Project Sites, if necessary. Otherwise, the first responders from Floral Park would not be called upon to provide service to the Project Sites. Please also see response to Comment 3-15.

Please also see the Operations Plan of the overall TMP (Appendix J), which addresses staffing associated with traffic and parking, including crowd management agents, traffic and parking attendants, permit attendants, and police. This staff would be distributed throughout the Project Sites and would handle various venues and parking lots.

Comment 3-15:

There is concern that the project will have an adverse impact on emergency response times for police, fire, and EMTs due to increased traffic congestion on the local street network and the Cross Island Parkway. Lives will be jeopardized when the emergency response time is slowed down due to the increased traffic on local streets. Traffic volumes will slow response time for volunteer firefighters who first drive their own cars to the firehouses before responding. (Baggott_2143, Brown_TS2_928, Chiara_TS3_960, Culotta_2365, Culotta_2572, Curran_2564, Dobson_TS2_916, Doherty_TS2_897, Fairben_TS4_994, Form Letter 5, Gayron_TS4_991, Greene_TS3_944, Harrington_2067, Hayden_TS2_930, Horn_TS4_982, Jacob_TS3_954, Liebmann_149, Liebmann_TS4_981, Longobardi_TS1_856, Lyons_FL5_038, Malfonsi_2558, Martinez_TS2_896, McAllister_TS1_867, McClintock_TS3_958, Mesnick_2237, Mesnick_TS1_870, Nicoello-Muscarella_2107, O'Grady_TS1_879, Pedley_TS4_993, Pombonyo_TS1_862, Pombonyo_TS2_917, Rakowski_TS2_909, Sawicki_TS2_911, Sussman_TS1_880, VFP_2548, Viscovich_096, Walsh_1040, Weiner_SSAS_2097, Weissman_TS2_922)

The DEIS lacks any credible assessment of the Project’s impacts on emergency services response times. The DEIS conclusion is erroneous, and based on serious misconceptions. Our Village and other surrounding communities’ fire and rescue trucks absolutely cannot “maneuver around and through” busy intersections connecting two-lane thoroughfares, with one lane of traffic in each direction, alongside necessary curbside parallel
parking. There simply is no room. And Floral Park’s Fire Department of well over 100 volunteer firefighters cannot “maneuver around and through” or ignore standard traffic controls as they are bound by traffic laws and they don't have emergency lights/sirens on the personal vehicles they use to respond to calls. Also 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. Chief Maickel mentions Plainfield Ave and that increased traffic could cut the Village in half. (VFP_2547, VFP_2548).

Response 3-15: The EIS does not identify significant adverse impacts with respect to emergency response time. The significant adverse impacts identified on the local network that have been identified in the EIS would be mitigated with the exception of all but two traffic movements at one intersection during the weekday AM peak hour, and one traffic movement at one intersection during the Saturday Midday peak hour.

ESD and the Applicant met with representatives from local emergency service providers including police and fire departments from Floral Park, South Floral Park and Elmont, as well as Nassau County, NYPD (main and Queens South), the New York State Police, New York Office of Emergency Management, Department of Homeland Security and Emergency Services (DHSES), and NYRA. Topics of discussion included monitoring for effects on emergency response times. Local police/fire departments would be included as stakeholders in the Transportation Management Plan (TMP, see Appendix J). A Monitoring Plan (part of the TMP) would include monitoring for effects on emergency response times. Local police/fire departments would be included as stakeholders in the TMP. The Applicant would continue to review the conditions regarding provision of emergency services, first responders and transportation and would consult with stakeholders as part of the Monitoring Plan once the arena and other Project components are operational.

Chapter 17, “Mitigation,” of the FEIS identifies measures to reduce auto trips to the Project Sites such as the addition of a new LIRR Elmont Station and measures identified in the TMP, which would also serve to lessen effects on emergency response times.

Comment 3-16: None of the letters to the commanders of emergency response teams indicate what the number of expected visitors would be to the retail site so how could they respond appropriately? (VFP_2548)

Response 3-16: The correspondence sent to the emergency service providers outlined the magnitude of the proposed development, including the proposed retail
square footage. Follow-up meetings were held with emergency service providers to discuss the development program, the number of visitors and other details of the Proposed Project. A separate meeting was held on May 17, 2019 with a number of the local emergency response providers as well as Nassau County, NYPD (main and Queens South), New York State Police, New York Office of Emergency Management, FBI, NYRA, the applicant, the applicant’s consultants, ESD and ESD’s consultants. See responses to Comments 3-15 and 3-7.

**Comment 3-17:** Where will the American Red Cross emergency trucks be relocated? (VFP_2548)

An estimate of 100 trucks/trailers are currently using this site for parking. With the With Action condition, these stored vehicles will be relocated from the Project Sites to a location outside of the study area. Please provide information on where these vehicles will be redirected to and if there is a facility that will accommodate for the misplaced vehicles. (NYCDOT_2562)

**Response 3-17:** As indicated Chapter 3, “Community Facilities and Utilities,” of the FEIS, the American Red Cross emergency trailers would be relocated on the Belmont Park property or to Aqueduct Raceway. The American Red Cross has been made aware that should the Proposed Project be approved, the on-site trailers would need to be relocated. NYRA-related trucks and trailers that are located in the North Lot would be relocated elsewhere on the Belmont Park property.

**Comment 3-18:** Questions posed to emergency responders did not ask if they have capacity (manpower and equipment) to accommodate the project, nor did they present the project’s full needs (e.g. traffic control personnel and extra security to control parking). The document also misrepresents the character of the answers (e.g. no comment about additional pertinent information from the police department was present as the police department stating there would be no impacts).” (EAM_2563)

**Response 3-18:** Appendix A of the EIS provides all correspondence sent to the emergency responders as well as their responses. Parking would be controlled on-site by the private entities associated with the project sponsor. See response to Comment 3-14 regarding crowd and traffic control throughout the Project Site.

**SOLID WASTE MANAGEMENT**

**Comment 3-19:** There is concern over littering in the North and East Lots. (Browne_TS1_853, Buechler_FL3_030, Cheng_014, Coven_2231, Crowe_FL9_2074, DAmico_088, Form Letter 3, Form Letter 9, McGovern_2322, Spina_085)
There is concern that the project will result in litter in the local communities. (Cheng_014, Coven_2231, Hellenbrecht_BCCA_052, Henry_2301, McGeever_2555, Mesnick_2237, Viscovich_096)

Response 3-19: Litter, loitering and security within the area of development would be handled by the entity responsible for each project component (e.g., the arena, the hotel, the retail facilities), as described in Chapter 3 of the FEIS. It is also noted that problems related to litter, loitering and security detract from the enjoyment and economic success of the venues, so it behooves the Applicant and operators to plan and manage these concerns.

Comment 3-20: The solid waste section does not say how or where it will be stored on Sites A or B prior to pick up. It also does not say how it will be managed. (VFP_2548)

Response 3-20: During construction, solid waste disposal shall be handled by a waste services company specializing in sorting, recycling and disposing of all elements of construction debris. The selected contractor would be committed to sustainability and LEED requirements. The construction manager would maintain the site cleanliness and have trash receptacles and debris containers managed appropriately throughout the Project. During operations, trash and recycling receptacles would be located throughout Sites A and B and all associated parking lots. Solid waste would be stored on Sites A and B in relation to all Project components within enclosures to screen them from public view. Solid waste associated with the arena would be stored in the marshaling area. All solid waste and recyclables would be collected and disposed of by a private carter. This description is included in the FEIS.

Comment 3-21: Leftover food from the proposed facilities should go to feed the hungry rather than going to a landfill. (Mandelbaum_TS4_970)

Response 3-21: Comment noted.

WATER SUPPLY

Comment 3-22: There is a concern that the project will have adverse effects on water supply. (Browne_TS1_853)

The DEIS does not adequately address potable water supply issues related to the Project. The DEIS indicates that “consultations” have been undertaken with WAWNC, and that WAWNC has “preliminarily” indicated that it can provide the volume of water expected to be needed by the Project. This assessment is wholly insufficient. The DEIS should include a detailed data-driven assessment of the current available water supply of WAWNC, the existing and anticipated future uses for same, and the extent to which WAWNC will be able provide the volume of
Chapter 22: Response to Public Comments

Response 3-22:

The WAWNC has stated that it can supply water to the Proposed Project with the installation of a new water main on the south side of Hempstead Turnpike from its existing well near Elmont Road. The Applicant has been meeting with the WAWNC and would continue coordination to determine the routing and sizing of the new main and the pavement restoration methods associated with its construction.

During the environmental review process, the Applicant and WAWNC have been meeting regarding water supply to the Proposed Project. WAWNC has been involved in the environmental review process from its early stages, has made comments on the DEIS, requested additional information and has been provided with the information requested. The projected water use for the Proposed Project is discussed and outlined in Table 3-3 in Chapter 3, “Community Facilities and Utilities.”

The average daily domestic water demand for the proposed redevelopment of Sites A and B is estimated at approximately 135,925 gpd, with a peak water demand of 2,600 gpm. In addition, as identified in Chapter 3, approximately 15 acres of the Project Sites would be irrigated. The total irrigation design during the growing season is estimated at 50,000 gpd to 75,000 gpd. WAWNC has stated that it can supply the requested amount of water to the Proposed Project with the installation of a new water main on the south side of Hempstead Turnpike from its existing well near Elmont Road. The Applicant has been meeting with WAWNC and would continue coordination to determine the routing and sizing of the new main and the pavement restoration methods associated with its construction. Additionally, based on the Applicant’s communications and meetings with WAWNC, the WAWNC has recognized that it would need to monitor its pumping operations and adjust filling timeframes, as necessary. Continuing communications with WAWNC have indicated that no new infrastructure would be required for storage purposes.

Comment 3-23: How were the estimates for water usage (135,000 gpd) arrived at? Does this include water usage for the retail village? (VFP_2548)

Response 3-23: As indicated in Chapter 3, “Community Facilities and Utilities,” the combined average daily domestic water demand for both Site A (arena, hotel, retail, office space and community space) and Site B (Retail Village, including retail and restaurants) was calculated to be approximately 135,925 gpd. A specific breakdown of uses for the retail village (including assumptions regarding percentage of retail versus
restaurants) are included in Table 3-3 of the EIS. These estimates were derived using the “Nassau County Minimum Design Sewage Flow Rates for Sewered Areas” (received from NCDPW on April 2018).

Comment 3-24: The water supply and sewage sections do not mention an incident when there was no water or sewage functions at the 2008 Belmont Stakes. In order to assess is the existing infrastructure can handle additional volume the 2008 incident must be examined. (VFP_2548)

Response 3-24: The EIS analysis presented in Chapter 3, “Community Facilities and Utilities,” uses the most current data available to evaluate potential impacts. Year 2008 was a year that lacked precipitation which led to the buildup of sediment in existing infrastructure within the Belmont Park Grandstand. As such, during the 2008 Belmont Stakes, sediment built up within the aforesaid infrastructure, that ultimately blocked water supply from reaching the Grandstands. This issue is solely related to NYRA’s infrastructure.

**SEWAGE DISPOSAL**

Comment 3-25: There is concern about the project’s potential impacts on sewage disposal. (Browne_TS1_853, Solages_2402, Trentacoste_TS2_902)

The DEIS does not account for future plans to divert waste from Bay Park to Cedar Creek WWTP. The DEIS incorrectly reports Total Maximum Discharge Limit (TMDL) for Bay Park STP. (Esposito_TS1_848, Weiner_SSAS_2097)

Response 3-25: The Nassau County Department of Public Works has indicated in a response letter (Appendix A) that the Nassau County sanitary sewer system and Bay Park Sewage Treatment Plant have sufficient capacity to transport and treat the anticipated sewage to be generated under the Proposed Project. Thus, the local sewer system would not experience a significant adverse impact due to the Proposed Project.

NCDPW’s plans to divert waste currently going to Bay Park STP to Cedar Creek WWTP is unrelated to the Proposed Project. The EIS has been corrected and updated to reflect that the discharge is to Reynolds Channel and the local embayment areas that are inland of the barrier islands and not to the ocean, and that the Bay Park STP provides secondary treatment with some enhancement for nitrogen removal.

Comment 3-26: DEIS states “the need for specific infrastructure to facilitate conveyance of sewage to the selected main is currently being evaluated.” what does that mean? Why is it not evaluated in the DEIS? What type of infrastructure is needed for sewage management and are there any
potential impacts? This should be studied in a Supplemental DEIS.
(Culotta_2365)

Response 3-26: Only on-site connections are required for connections to the existing sewer infrastructure. No off-site modifications to the sewer infrastructure are required. The language in the FEIS indicates that the NCDPW has provided a sewer availability letter. This letter is included in Appendix A.

ELECTRICAL SUPPLY

Comment 3-27: There is concern that the project will have adverse effects on the electric supply, and whether PSEG can provide sufficient electricity. Describe the proposed power lines. (Anskat_2397, BPCC_132, McDonald_TS1_882, McGeever_2555, Moriarty_TS4_1004, Solages_2402, Trentacoste_TS2_902, Tweedy_TS1_893)

Where will underground distribution feeders run on the Belmont Park campus? A map of the route must be provided in the EIS. The DEIS states the underground electric feeders will extend west from the power station - how is this possible? Does any land used for the electrical feeders belong to the Village of Floral Park? How close will the electrical feeders be to residences? Please confirm that the electrical substation and its underground electrical feeders are being proposed to serve the Proposed Project. Will the Belmont Park road need to be reconstructed for the underground distribution feeders? Is there a plan to illuminate Belmont Park road? Confirm that the power station and underground electrical feeders are for the Proposed Project and not needed for the existing NYRA facility. Where exactly will the overhead power lines begin on the Belmont Park property? Will overhead lines be installed at Plainfield Ave gate or deep within the campus? If they are within the campus, where will they be located? If overhead lines are to be located on the perimeter of the campus does this mean trees will be removed? Why not run the lines directly to Plainfield through the southern portion of the north lot instead of the northern perimeter? P. 6-5 states that “…these lines would be run on two new powerpoles installed inside the northeast corner of the Belmont Park property. The transmission lines would then run down the pole and transfer underground, running along the northern perimeter of the Belmont Park property until reaching the new electrical substation.” Where would these new powerpoles be located? (VFP_2548)

Under Electrical Service, PSE&G identified the need to construct an electrical sub-Station to adequately serve the Proposed Project. Please confirm the required PSE&G Substation required to power the proposed development is located on-site, and where, as it is unclear in the site plan. (VFP_2547)
Response 3-27: PSEG Long Island indicated in a response letter that adequate service would be provided to the Proposed Project (see Appendix A).

A proposed electrical substation would be constructed immediately west of the North Lot between the on/off ramps of the Cross Island Parkway on the Belmont Park Property, shown in EIS Figure 1-2. As illustrated in Appendix B of this FEIS, underground transmission lines would extend east from the substation along Belmont Park Road for approximately 1.5 miles. The transmission lines would then transition to riser poles on Plainfield Avenue and connect to existing overhead power lines on Plainfield Avenue. A transmission overpass would be installed to connect to the existing overhead circuit on Plainfield Avenue.

The text in the EIS has been modified to reflect clarifications regarding the PSEG substation.

Comment 3-28: On page 3-24 of DEIS Chapter 3, “Community Facilities and Utilities,” it is stated that “Typical exposure in the home to man-made EMFs is likely to be greatest from electrical distribution lines, house wiring, electrical appliances, and ground currents in plumbing, gas lines, and steel girders” and that “EMF levels from a substation are generally not considered hazardous.” [emphasis added]. Due to average distance of electrical distribution lines from residences, as well as the levels of EMFs from electrical distribution lines, it is assumed that the EMF levels within residences from the electrical distribution lines would be negligible. The estimated levels for all LIPA substations have been below the Public Service Commission interim standard for electrical fields of 200 milligauss, and therefore the EMF levels would not be considered hazardous. (PSEG_043)

Response 3-28: The language in the FEIS has been modified in accordance with PSEG Long Island’s comments.

Comment 3-29: PSEG asked that the FEIS include description and analysis of the additional Overhead Transmission Work required for the substation, based on designs submitted by PSEG to ESD on January 3, 2019. (PSEG_043)

Response 3-29: Additional description of the overhead transmission line work associated with the proposed electrical substation is provided in Chapter 15, “Construction,” of the FEIS.

Comment 3-30: The DEIS in several instances stated that “the underground transmission lines would extend west from the proposed substation along Belmont Park Road approximately 1.5 miles, and tie into existing overhead power lines on Plainfield Avenue. An overhead bypass would also be installed
Chapter 22: Response to Public Comments

on Plainfield Avenue.” Please update the above-referenced text to state that transmission lines would “extend east from the proposed substation.” Please also update any references to “overhead bypass” to “transmission overpass to connect to the existing overhead circuit on Plainfield Avenue.” [emphasis added]. (PSEG_043)

Response 3-30: The language in the FEIS has been modified in accordance with PSEG Long Island’s comment.

Comment 3-31: There is concern over the proximity of the substation to schools and residences. (Browne_T51_853, Culotta_T51_890, Culotta_2572, Culotta_2365, Jacob_T53_954)

Response 3-31: The proposed electrical substation is analyzed in Chapter 3, “Community Facilities and Utilities” of the EIS. According to PSEG, EMF levels from its substations are not considered hazardous (see response to Comment 3-28). Nevertheless, as stated in the Final Scope, the proposed electrical substation has been relocated from the originally proposed location immediately adjacent to the Floral Park Bellerose School athletic field to a location in the vicinity of the Cross Island Parkway ramps, just north of the Racetrack, directly adjacent to the North Lot to the west. The proposed location of the electrical substation is identified on Figure 1-1, Project Location in Chapter 1, “Project Description.” It is approximately 450 feet from the nearest residence and over 1,000 feet from the Floral Park-Bellerose school athletic field.

Comment 3-32: There is concern that ESD did not consider a cogeneration facility proposed at Belmont. (McEnery_2393, McEnery_2336, Tweedy_T51_893)

Response 3-32: Cogeneration was not contemplated for the Proposed Project, and therefore was not analyzed.

Comment 3-33: Does the project propose to supply energy back to the local grid? (Gullo_T53_939, MacDonald_2354)

Response 3-33: The Proposed Project does not contemplate supplying energy back to the local grid.

NATURAL GAS SERVICE

Comment 3-34: A new natural gas pipeline is needed to address the project’s heating needs. The current plans for the arena complex rely on natural gas and no potential alternatives have been made public. Regarding National Grid, the DEIS concludes that there “would be no significant adverse impact to the natural gas supply” (pg. 25). However, deep into the Appendix A, there is a letter from National Grid dated November 9, 2018 which states
the following: Supplying firm service (365 days) for this Project is contingent on the successful and timely approval and permitting of the Northeast Supply Enhancement Pipeline Project (NESE), which is currently scheduled to be in service December 2020. The NESE project is designed to deliver additional gas supply to National Grid’s system and is required to support this Project; these gas supply requirements should not be confused with references to distribution capacity on National Grid’s system in this letter. Why did AKRF and the proposed developers fail to mention the above issue in the DEIS? (Alfonsi_2346, Alfonsi_2346, BPCC_039, BPCC_1056, BPCC_1057, BPCC_147, BPCC_2087, BPCC_2194, Culotta_2365, Culotta_2572, Cunningham_TS4_1023, Moriarty_TS4_1004, Solages_2402, Weiner_SSAS_2097)

How will each of the project components (arena, hotel, retail) be heated? (Cunningham_TS4_1023)

Response 3-34: Although natural gas is available in the vicinity of the Project Sites, it is noted that at this time, National Grid has stopped processing new applications for service for all residences, small businesses and large development projects due to NYSDEC’s rejection of the water quality permit for the Williams Pipeline, also known as the Northeast Supply Enhancement (NESE) project. The applicant for the pipeline has begun to address NYSDEC’s concerns and is hopeful that a mutually agreeable solution can be achieved. However, developments that require new gas connections for new projects must seek alternative fuel sources as National Grid cannot be relied upon to supply natural gas.

In the absence of natural gas, the Applicant is considering the use of liquefied petroleum gas (LPG) propane service. If LPG is used, it would be stored in two large (approximately 30,000-gallon) tanks installed below ground, sufficient to serve the entire Project. It is expected that these tanks would be located on the south side of the proposed arena, near Red Road. The location south of the arena would facilitate distribution to the proposed hotel and to the retail village on Site B. It is anticipated that deliveries would be on the order of one tanker truck following an arena event.

Chapter 12, “Air Quality,” provides a stationary source analysis that is considered an alternate scenario where natural gas or LPG propane gas would only provide a limited service to the Proposed Project. For this scenario, all required loads for the arena, hotel, retail and dining, and office and community space on Site A, as well as the retail village on Site B, would be served by electric-powered systems. The heating and hot water systems would be served by electric-powered Packaged Terminal
Air Conditioner (PTAC) units and heat pumps. The Proposed Project would only use natural gas or LPG propane gas for cooking uses.

**Comment 3-35:** The natural gas section states the "natural gas demands of the Proposed Project can be satisfied with the installation of additional gas main and gas service lines" but does not identify where and how this would be done. What is the impact of new gas lines? (VFP_2548)

**Response 3-35:** As detailed in Chapter 3, “Community Facilities and Utilities,” of the FEIS, the existing gas main in Hempstead Turnpike ends approximately 900 linear feet (LF) east of the proposed arena location. In order to provide gas service to the development, if such service were available in the future, the gas main would need to be extended by National Grid, consisting of approximately 800 LF of 8-inch gas main. National Grid has also determined that upgrades to its infrastructure would be required to provide the demand to the Proposed Project, consisting of replacement of about 1,900 LF of 8-inch gas main to replace a 4-inch gas main in Hempstead Turnpike and 600 LF of new 4-inch gas main in Dutch Broadway between N. Corona Avenue and Franklin Avenue in order to help restore pressure in the Valley Stream low area affected by the added Project load. Please also see the response to Comment 3-30.

**Comment 3-36:** Will the project utilize compressed natural gas (CNG) via rail or trucks, which is not permitted on the CIP? (Cunningham_TS4_1023)

**Response 3-36:** The use of compressed natural gas is not contemplated for the Proposed Project. See response to Comment 3-34 for energy sources should natural gas not be available.

**OPEN SPACE AND RECREATIONAL RESOURCES**

**Comment 4-1:** There is concern over the loss of the Belmont Park Backyard, including its picnic area. Will it remain? (Braun_2348, EAM_2563, Pelletiere_TS2_908, Riebe_2075, Smith_018, Smith_2078)

The DEIS states that the Backyard (7 acres) includes amenities such as a man-made water feature, shaded seating areas, mature trees and a playground providing recreational space for children. The Backyard has long provided family-oriented green space for patrons of Belmont Park. While the Proposed Action for Site A would create approximately two acres of hard and soft-scaped plaza, the Backyard and its function would be drastically scaled down. The Backyard has been an integral feature of Belmont Park over the years. Is it feasible to fully maintain the Backyard function or relocate it entirely to another location on Site A or Belmont Raceway? (Curran_2564)
Response 4-1: As described in Chapter 4, “Open Space and Recreational Resources,” the Proposed Project would displace approximately 5 acres of the existing “Backyard” space within Belmont Park. The Backyard is used by Belmont Park employees and NYRA invitees who pay the entry fee to access the Backyard to participate in betting and other racing-related activities in a family-oriented green space setting. With the Proposed Project a majority of the existing picnic areas within the Backyard would be displaced. With the Proposed Project, displaced portions would be redeveloped with new seating areas and gathering spaces for on-site events. With the new plaza spaces on Site A, new open spaces on Site B, and improvements to off-site parks, the EIS analysis finds that area open spaces would meet the recreational space needs of existing residents, Backyard patrons, and new workers and visitors.

NYRA is developing a plan to relocate backyard amenities and activities to suitable alternate locations. Larger events that have been held in Site A or the South Lot (currently 3-4 day events, approximately 3 to 5 times a year) are expected to continue in the South Lot, but would require coordination between NYRA and NYAP. The commitment to coordinate these arrangements would be memorialized in the shared parking agreement among NYRA, the FOB, and NYAP. In addition, separate from NYRA, NYAP would provide public open place space on Sites A and B for gathering and social purposes, including a children’s play area in the retail village.

Comment 4-2: There is concern that the project changed in such a way that it eliminated significant amounts of open space from the project. (Cornell_129, Form Letter 1, Gross_TS1_858, Kubler_FL1_007)

The project should include more open space (e.g., park, community garden) for aesthetic and health purposes and the benefit of the surrounding community. Belmont Park must stay park-like. (Alfonsi_2400, Alfonsi_TS4_1030, Amato_2362, Amato_2362, Amato_TS3_935, Anonymous_083, BPCC_132, Culotta_2365, Harnett_TS4_1037, Jean Pierre_TS3_937, Johnson_146, MacDonald_2354, McEnery_2336, McEnery_2392, McEnery_2393, Moore_TS3_952, Moriarty_TS4_1004, Motley_081, OGorman_137, Sferlazza_2263, Spina_085, Tannenbaum_2076, Walker_TS4_978)

This vegetative zone on the southeast border of Site B should be expanded. The residents of Locust Wood need a park. A little strip of green space is not enough. (Walker_TS4_978)

Response 4-2: Based on feedback from local communities during the Proposed Project's scoping process, the proposed open space program was revised to include primarily passive recreational space on Project Sites A and B, and would
Chapter 22: Response to Public Comments

not include sports fields. Rather than on-site active open spaces, improvements to existing off-site parks (Elmont Road Park and Hendrickson Avenue Park) would be undertaken by NYAP. The FEIS includes a description of the types of improvements being contemplated (see Chapter 4, “Open Space and Recreational Resources”).

Comment 4-3: The proposed open space is inadequate. What is identified as green space are traffic buffers. The plaza is really just a sidewalk. The proposed open space is not designed in a way that would make it useful to the local communities. The plaza portion on Site A may be utilized by visitors to the arena or hotel, but is unlikely to be useful to the surrounding community. (Culotta_2572, Terry_TS4_1032, VLI_2125)

Response 4-3: The Proposed Project would include a variety of open space offerings, including: landscaped plaza spaces that would be open to the public, and that would host pop-up events for the public; areas for passive recreation (e.g., walking, people-watching); as well as playground space within the Retail Village on Site B. See also the response to Comment 4-2.

Comment 4-4: What is the specific commitment to open space and recreational improvements? (EAM_2563)

Response 4-4: The RFP required open space at the southern tip of Site B. In response to public comments, local elected official feedback and community needs and desires, NYAP would be required to provide improvements and/or renovation to the approximately 7-acre Elmont Road Park and 1-acre Hendrickson Avenue Park, existing community parks located off-site in the Town of Hempstead. The FEIS includes a description of the types of improvements being contemplated (see Chapter 4, “Open Space and Recreational Resources”).

Comment 4-5: Include plans for community reinvestment such as a new Elmont Road Park. (Culotta_2572, Kaplan_2550, Kaplan_TS4_967, Swaby_MM_1045)

Response 4-5: As described in the DEIS, NYAP would provide improvements and/or renovation to an existing community park located off-site based on coordination with local officials and community stakeholders. Since the issuance of the DEIS, Elmont Road Park and Hendrickson Avenue Park have been identified as community parks to be improved. The FEIS includes a description of the type of improvements being contemplated (see Chapter 4, “Open Space and Recreational Resources”).

Comment 4-6: Consider including a sports or recreational facility and sports fields as part of the project. (Amato_TS3_935, Arbelaez_TS3_955, Chu_093,
Response 4-6: The programming of open space and community space was developed in coordination with community groups, and does not currently contemplate public sports or recreational facilities. Please also see the response to Comment 4-2.

Comment 4-7: Will the 3.75 acres of publicly accessible landscaped open spaces on Site B be open to the public without paying a parking fee? If so, where will this parking be provided? What enforcement will be used to ensure arena patrons will not use these spaces? (VFP_2548)

Response 4-7: The 3.75 acres of publicly accessible open space on Site B (as well as the playground within the retail village) would be open to the public, though any visitors utilizing Site B parking would be subject to parking fees (unless validated with retail purchase). The open space on Site B would be accessible to pedestrians free of charge via Site B entrances on Hempstead Turnpike.

Comment 4-8: DEIS states “the Proposed Project would not preclude the ongoing use of existing open space resources at Belmont Park by Floral Park Memorial HS students.” The HS would experience significant adverse impacts on air quality, noise, and security from the East Lot’s use and increased traffic. This lot should not be used for parking and the project should be scaled back to reduce traffic impacts. (Culotta_2365)

Response 4-8: The EIS includes air quality and noise analyses that evaluated the potential for significant adverse impacts from the Proposed Project’s utilization of the East Lot. The analyses found that maximum predicted air pollutant and noise level increases would not exceed air quality or noise thresholds established for determining significant adverse impacts according to applicable evaluation guidance (see EIS Chapter 12, Section C and Chapter 13, Section C, for detail on air quality and noise standards). With respect to parking lot security, the Applicant would provide security personnel, signage, and CCTV to enforce all parking lot regulations, including tailgating prohibitions. In addition, as detailed in Chapter 17, “Mitigation,” of the FEIS, with the implementation of proposed mitigation measures, it has been determined that the East Lot would likely only be needed approximately 15 times a year to accommodate retail and arena parking (and potential daytime Belmont Park racing events) on certain weekend days in the midday, when parking demand would be at its maximum. A portion of the East Lot would be regularly utilized for bus parking.
Chapter 22: Response to Public Comments

Comment 4-9: NYRA should continue to allow Floral Park Memorial High School to use the Pony Track infield for athletic practice and events. (Culotta_2572)

Response 4-9: As stated in Chapter 4, “Open Space and Recreational Resources, “the Proposed Project would not preclude the ongoing use of existing open space resources at Belmont Park by Floral Park Memorial High School students.”

Comment 4-10: DEIS states that there will be no adverse impacts on park resources within the secondary study area but the increase in traffic though the one-mile radius will bring resulting air quality, noise, and safety impacts to parks in the area and will affect the usage of the parks. (Culotta_2365)

Response 4-10: As noted by the commenter, Chapter 4, “Open Space and Recreational Resources” finds that the Proposed Project would not generate traffic or other conditions near open spaces within the 1-mile study area that could result in significant adverse impacts due to noise, air quality, or shadows. The incremental volumes of traffic at locations within close proximity to open spaces would not result in significant adverse impacts on these resources.

Comment 4-11: There is no discussion on how the arena or hotel could cast shadows onto the racetrack. This could have a negative effect on races as horses to occasionally “jump shadows.” (VFP_2548)

Response 4-11: As described in Chapter 4, “Open Space and Recreational Resources,” project-generated shadows would not be long enough to reach the Racetrack at any time of the year. This includes project-generated shadows from the proposed arena and hotel.

Comment 4-12: The space between Belmont Park and Floral Park should be maintained as open space and even restored to its prior natural state, and that open space must include the long promised but not yet operational water recharge basin for the west end of Floral Park. Once in place the Floral Park recharge basin could even host a controlled dog run space when water is not actively being recharged there. (McEnery_2393)

Response 4-12: The space between Belmont Park and Floral Park is not proposed to be open space. The request for a water recharge basin for the west end of Floral Park is outside the scope of this EIS.

HISTORIC AND CULTURAL RESOURCES

Comment 5-1: The racetrack should be a historic landmark and there is concern that this project will negatively impact the value of the racetrack. There is concern that thoroughbred owners and trainers would decide to relocate. (Casey_2099)
Response 5-1: In a letter dated May 25, 2018, the New York State Office of Parks, Recreation and Historic Preservation determined that Belmont Park does not meet the criteria for inclusion on the National Register of Historic Places. Therefore, as stated in Chapter 5, “Historic and Cultural Resources,” of the EIS, the Proposed Project would not result in impacts to historic resources. The relocation of owners and trainers from Belmont Park is speculative.

Comment 5-2: Has Belmont Park ever been submitted for potential historic preservation? If so, when? Who submitted the request and was it related at all to the Proposed Project? (VFP_2548)

NYS OPRHP determined that the grandstand and façade of Belmont Park do not meet the criteria for inclusion in the state or national registers of historic places. How did the state determine this and what analysis supports it? (Culotta_2365, Culotta_2572)

Response 5-2: As required by the State Historic Preservation Act, ESD submitted information regarding the Site and its structures to the OPRHP and its State Historic Preservation Office (SHPO) for their review. The SHPO determined that the Site and its structures do not meet the eligibility criteria (see Appendix B, “Historic and Cultural Resources Correspondence,” of this FEIS).

Comment 5-3: Analysis was not done to determine if any subsurface archaeological resources would be disturbed during construction on Sites A and B. I urge ESD to have this done and to develop a construction protection plan, in cooperation with NYS OPRHP and NYAP, which should outline measures that the parties would undertake to protect historic resources should they be uncovered. (Culotta_2365, Culotta_2572)

Response 5-3: As detailed in Chapter 5, “Historic and Cultural Resources,” in a letter dated August 10, 2018, the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) determined that the Proposed Project would not result in any adverse impacts to historic and archaeological resources (see Appendix B). There are no known or potential archaeological or architectural resources on the Project Sites or within the other directly affected areas, and thus the Proposed Project would not have any direct or indirect impacts to on-site archaeological or architectural resources.

VISUAL RESOURCES

Comment 6-1: The hotel location directly in front of the Racetrack/Paddock would overshadow and destroy the beauty of Belmont Park. The 150-foot-tall hotel and 125-foot-tall arena would be substantially taller than the 105-foot-tall Belmont Grandstand. They would not fit with the visual
Chapter 22: Response to Public Comments

character of the Belmont site and the surrounding community. I urge ESD to eliminate the hotel from the project and reconsider design options and locations for the arena; the arena should not interfere with the views of a historic resource. (Culotta_2365, Culotta_2572, Doyle_1055, EAM_2563, McEnery_2336, McEnery_2340, McEnery_2393, McEnery_2392)

The DEIS statement “The views would remain compatible with the street's existing setting, which includes a north view of the Grandstand/Clubhouse” completely ignores the visual impact of a 150-foot hotel, the arena impact, and the impact of the grandstand facade being substantially blocked and existing view changed. (EAM_2563)

The proposed hotel would be 150 feet high and contain 250 rooms. The large structure does not fit the character of the surrounding residential community - it would be one of the tallest buildings in suburban Long Island. Urges ESD to scale down the size of the hotel or eliminate it. (Culotta_2365)

Response 6-1:
As stated in Chapter 6, “Visual Resources,” the existing Grandstand/Clubhouse is a 105-foot-tall building with a very large footprint, extending 1,266 feet long on its north and south elevations. Although the existing Grandstand/Clubhouse is not prominently visible from outside of Belmont Park, as it is set behind parking and other vegetation from Hempstead Turnpike, the building is a similar scale to the proposed 150-foot-tall hotel (reduced from the originally proposed height of 265 feet) and 125-foot-tall arena. As detailed in Chapter 6, the hotel would not block views to important visual and aesthetic resources.

Comment 6-2:
There is concern that the parking lots will ruin the existing views. (Amato_2362, Lauria_095)

Response 6-2:
As detailed in Chapter 6, “Visual Resources,” views to the East Lot from residential streets in Floral Park would be partially obscured by the existing vegetation along the northern boundary of Belmont Park Road, which extends along the north end of the Training Track, and by the North Field on Belmont Park property, located north of the Training Track, which would also provide a green buffer. The improved East Lot parking would also be partially visible from the rear playing fields and running track at Floral Park Memorial High School along Plainfield Avenue, though views would be indirect and at a distance of approximately 1/5 mile as the proposed parking improvements are located towards the middle and south ends of the East Lot and views from the school’s fields would either be across the existing Pony Track or largely blocked by existing buildings and vegetation, on Belmont Park property. The Proposed Project would also include a buffer composed of a hedgerow.
(at least 8 feet in height) with dense evergreen vegetation along a new
replacement fence (between 8 and 12 feet in height) with privacy
screening would be provided along the northeastern boundary of the
North Lot to shield the Floral Park-Bellerose School recreation space
from parking activities in the North Lot. In addition, fencing with privacy
screening would be extended along the remainder of the North Lot’s
boundary along Belmont Park Road from approximately Crocus Avenue
to Mayfair Avenue to shield residences from parking lot headlights.

Comment 6-3: Suggest a barrier or plantings to reduce the sight of traffic from north of
the East parking lot. Parking lot lighting is also a concern. (Rakowski_2098)

Response 6-3: The EIS does not find the potential for significant adverse visual or other
environmental impacts associated with the Proposed Project’s utilization
of the East Lot; therefore, a barrier on the Belmont Racetrack property in
the vicinity of the East Lot and the Village of Floral Park is not part of
the Project. In addition, as detailed in Chapter 17, “Mitigation,” with the
implementation of proposed mitigation measures, it has been determined
that the East Lot would likely only be needed approximately 15 times a
year to accommodate retail and arena parking (and potential daytime
Belmont Park racing events) on certain weekend days in the midday,
when parking demand would be at its maximum. A portion of the East
Lot would be regularly utilized for bus parking.

With respect to parking lot lighting, please see the responses to
Comments 6-4 through 6-7.

Comment 6-4: There is concern about the project's potential to result in light pollution.
(Conway_T5_1035, MacDonald_3554, Mezzetti_100, Solages_2402,
Zoleta_092)

Response 6-4: As detailed in Chapter 6, “Visual Resources,” the arena itself would be
illuminated as the central element of the site using a combination of
exterior lighting, active signage, and projections on façades facing the
interior of Site A (i.e., not visible from the Cross-Island Parkway). On
evenings when the arena is not in use, lighting levels would be reduced
through dimming and selective use of elements to create a more relaxed
environment. Lighting for safety and security would also be provided, but
lighting elements used during events would be dimmed or not used at all
when crowds are not present. This would also be true during late night
and overnight hours. Uplighting or projection lighting would be focused
onto specific façades facing the interior of Site A, and contained within
the arena area. Lighting events would be controlled and designed to limit
vertically lighting up into the sky, so as to not adversely affect aesthetic
resources and locally sensitive receptors in the study area.
Locally sensitive receptors in the study area would have no light trespass from the proposed arena area lighting (light trespass occurs when spill light is cast where it is not wanted). Hempstead Ballfield, Hempstead Bench Spread, and Pat Williams Playground would have views of the arena lighting. However, these open spaces are primarily used during the daytime, so that the public’s experience and use of the open spaces would not be impacted. Residential areas to the north would continue to have distant views of the arena. Residential streets in the western portion of the Elmont neighborhood would have limited views of the upper stories of the proposed hotel. Façade illumination of the hotel would be visible from these streets, but views from the residential streets in Elmont to Site A are limited and indirect.

In the eastern portion of Site B, by using poles no taller than 35 feet, and with the relative grades and height of the proposed landscaped berm as well as the use of shielding to control the direct view of the light fixtures themselves from neighboring properties, little or no direct illumination is anticipated to be detectable within the Elmont neighborhood beyond the Site B property line. The retail village lighting zone would be located west of the Site B Eastern Portion lighting zone, and near residential streets in the Elmont neighborhood. The retail storefronts are designed to be internally facing so as to control views and light migration off site. The outward-facing sides of retail buildings that face towards the Elmont neighborhood east of Site B are largely protected from view by decorative walls and gates. Security and safety lighting would be located to be out of view and with controlled distribution. The proposed retail village lighting would be indirectly visible from the residential streets in the Elmont neighborhood, and at a distance from the neighborhood.

**Comment 6-5:**

There is concern about potential light pollution on the adjacent schools. (Cunningham_TS4_989, Stacom_844)

There are requests that the North and East Lot not be used for the Project over concerns about potential impacts of light pollution on community character. (Browne_TS1_853, Buechler_FL3_030, Cheng_014, Coven_2231, Crowe_FL9_2074, Culotta_2365, Culotta_2572, DAmico_088, Form Letter 3, Form Letter 9, FPBPTA_2226, Gayron_TS4_991, Nicolello-Muscarella_2107, VFP_2548)

The use of the lots would bring light pollution shining into the windows of homes from the parking lot lights that would need to be installed as well as from the headlights of the cars entering and leaving at all hours of the day and night. (i.e. lighting of a space that is not currently lit).

Will the lighting in these lots be angled away from homes and schools? Can the lighting be turned off during certain hours or non-event nights?
ESD mentions that these lots will remain illuminated at night for security purposes.

The use of this lot would also bring light pollution shining into the windows of homes from the parking lot lights that would need to be installed as well as from the headlights of the cars entering and leaving at all hours of the day and night. (i.e. lighting of a space that is not currently lit). (McGovern_2322)

Regarding the views to the East Lot from residential streets, the DEIS says that views would be partially obscured by the existing vegetation. Partial obscuring is not sufficient - increased vegetation must be included. There is significant light emanating from that lot already and the majority of arena events will occurring in the winter months. Increased vegetation must be included. (VFP_2548)

There is concern about potential light pollution from the project's parking lots. There is particular concern about the potential for lighting impacts from the parking lots 365 days a year. (Culotta_TS1_890, Coven_2231, Flood_TS1_892, McGovern_2322, Mesnick_2237, Schlechter_TS3_943)

The site plan indicates a road running in the backyard of communities. The North and East Lots are also expected to generate adverse impacts. What would the mitigation for light pollution be, for example? (Culotta_TS1_890, Coven_2231, Flood_TS1_892, McGovern_2322, Mesnick_2237, Schlechter_TS3_943)

Response 6-5: As described in the “Assessment of Proposed Lighting Schemes” section of Chapter 6, “Visual Resources,” in each of the parking lots, the locations and distribution of light poles would be selected to limit illumination to parking surfaces only. Full cut-off luminaires and shielding would minimize light trespass at the property boundary, with no direct lighting to occur beyond to the adjoining residential neighborhoods. Parking field poles would be 30 to 40 feet tall with full cut-off luminaires that would provide a minimum of 1 foot-candle and maximum of 10 foot-candles on all parking surfaces. The light poles would be spaced to provide even illumination in the parking fields. Parking field illumination would be controlled by time clock and daylight sensors to operate from dusk to dawn. The Floral Park-Bellerose School and Floral Park Memorial High School are primarily active during the daytime, when the proposed lighting would not be in use. The Proposed Project would include dense evergreen vegetation and replacement fencing with privacy screening along the northeast perimeter of the North Lot to limit its visual connection with the Floral Park-Bellerose School. Additional fencing with privacy screening would be provided by NYAP along Belmont Park Road from approximately Crocus Avenue to Mayfair
Avenue to shield the adjacent Floral Park neighborhood from parking activities in the North Lot. The East Lot is located approximately 1/5 mile from the Floral Park Memorial High School's athletic fields. Views of the Proposed Project from the school’s athletic fields are expected to be minimal, due to distance, as well as the presence of the intervening Pony Track, trees, and the Belmont stables that obstruct views. A combination of existing vegetation and proposed fencing/buffer would minimize off-site light pollution generated by headlights within parking areas.

Comment 6-6: The DEIS on page 6-25 states that light poles in the East Lot would be partially visible from residential streets, though they would be located at a distance from the streets and would not alter the character of the neighborhood or infringe on views of aesthetic resources. There are no visual images of this, therefore no assurances that this statement is true. With regards to illuminated "East Lot": address lighting and how its impact will be mitigated. Will it be angled away from homes and our school? What is the height of lighting? Can it be turned off during off hours/non-event nights? (Flood_2394, VFP_2548)

Response 6-6: As described in the “Assessment of Proposed Lighting Schemes” section of Chapter 6, “Visual Resources,” lighting would be selected to illuminate parking services only, with shielding. There would be no direct lighting to adjoining residential neighborhoods. Parking field poles would be 30 to 40 feet tall with full cut-off luminaires that would provide a minimum of 1 foot-candle and maximum of 10 foot-candles on all parking surfaces. Parking field illumination would be controlled by time clock and daylight sensors to operate from dusk to dawn. A lighting control system would provide the ability to lower light levels after events on site to limit unwanted lighting late at night, but still provide sufficient safety and security lighting. In each of the parking lots, the locations and distribution of light poles would be selected to limit illumination to parking surfaces only.

Comment 6-7: There is concern about the lack of detail about the berm or barrier that would alleviate lighting effects. (Longobardi_TS1_856, Spina_085)

Response 6-7: As stated in the Chapter 6, “Visual Resources,” the eastern edge of Site B would be developed with a linear open space including a vegetated buffer with a minimum width of 50 feet featuring landscaped berms, hedges and plantings. The approximately 8-foot-tall landscaped berm and new tree plantings would obscure views of the lower portions of the Proposed Project on Site B and from the residential streets in the Elmont neighborhood. The proposed landscaped berm would create a visual and acoustic separation between the residential streets in Elmont and the Proposed Project on Site B. The berm would shield the perimeter
roadway from view of the neighboring residential properties to the east of Site B and would minimize light intrusion in the Elmont neighborhood. The use of full cut-off luminaires would minimize light trespass at the property boundary on Site B with no lighting directed towards the residential streets to the east. By using poles no taller than 35 feet, and with the relative grades and height of the proposed landscaped berm as well as the use of shielding to control the direct view of the light fixtures themselves from neighboring properties, little or no direct illumination is anticipated to be detectable within the Elmont neighborhood beyond the Site B property line.

Comment 6-8: The DEIS illustrated “potential visual effects” showing only 7 vantage points with barely any detail (gray box in distance representing hotel) while they included 110 photos of existing conditions. There is nothing showing the arena, mall, public spaces, parking lots or other areas. Please provide visual renderings of these items as well as additional detail on the hotel. (Alfonsi_2349, Alfonsi_2368, Curran_2564, EAM_2563)

The EIS should include views from Hempstead Turnpike (eastbound) into Nassau County and from Cross Island Parkway. What gateway will there be? (EAM_2563)

Response 6-8: The DEIS’ visual renderings of the Proposed Project, found in Chapter 6, “Visual Resources,” are consistent with the Final Scope and SEQRA standards for assessment of potential visual impacts. With respect to detail, specific building finishings are not yet known, nor is that level of detail necessary to evaluate the potential for significant adverse visual impacts under SEQRA. In response to public comments, an additional visual rendering of the Project Site (looking eastbound on Hempstead Avenue) is included in the FEIS, see Figure 6-67 and corresponding discussion in FEIS Chapter 6. In addition, FEIS Chapter 17, “Mitigation” presents three new visual renderings associated with the planned LIRR Elmont Station.

SOCIOECONOMIC CONDITIONS

STUDY AREA DEMOGRAPHIC, HOUSING, AND LABOR FORCE CHARACTERISTICS

Comment 7-1: The chart numbers in the overall study area have higher numbers than the individual areas. i.e. chart 7-11 has an unemployment rate of 8.8 percent but Floral Park and Elmont are lower individually. (VFP_2548)

Response 7-1: Table 7-11 of Chapter 7, “Socioeconomic Conditions,” correctly indicates that the study area—which consists of the 10 census tracts within a one-half mile radius of the Proposed Project and is shown in Figure 7-1—has a higher unemployment rate than either Floral Park or Elmont, which are different geographic areas.
Chapter 22: Response to Public Comments

ECONOMIC BENEFITS

Comment 7-2: The economic benefits are questionable and there are not enough benefits for a project of this scale. (Alexander_TS1_887, Weiner_SSAS_2097)

The commenter cites two Citizen's Budget Commission analyses of the cost of New York's state and local economic development programs. One finds that between 2016 and 2018 state and local economic development costs continued to increase, state spending shifted toward discretionary grants and away from as-of-right tax breaks, and transparency has not meaningfully improved. These continue trends found in 9/16 policy brief that examined changes between 2014 and 2016. All agreements that ESD has made for this project should be disclosed. Similar to how ESD released its MOU with Amazon. (BPCC_2200, McEnery_2340)

What are the economic benefits to local residents? (BPCC_132)

How is this Proposed Project fulfilling the UDC Act? (BPCC_2108)

Response 7-2: Comments solely about economic benefits, apart from their ability to cause environmental impacts, are beyond the scope of a SEQRA review. However, the Project would generate through increases in State, County and municipal tax revenues (including sales tax revenues from the retail uses and Arena operations, entertainment tax revenues, and income tax revenues) from the Arena, retail, hotel, food and beverage, and commercial office uses; and provide a PILOT that would exceed the value of the payments that the municipality currently receives for the Project Sites. In addition, as outlined in Chapter 7, “Socioeconomic Conditions,” the economic benefits of the Proposed Project also include:

i) improvement, activation, and revitalization of the Project Sites by providing new retail, hospitality, and entertainment uses and substantial employment opportunities that can be locally accessed by adjacent communities; ii) creation of a gateway to Long Island by creating a striking new presence for the Town, County, and region, and the Project’s architectural design, signage, and landscape elements would transform the current vacant, underutilized, and deteriorated Project Sites for the benefit of the community; iii) creation of a premier destination by providing a year-round arena, retail, hotel, commercial office space and community facilities space that complement Belmont Park Racetrack, including the return to Long Island of the NHL’s Islanders; iv) promotion of public safety and create an asset of lasting importance and value to the greater community; v) creation of over 3,000 permanent jobs and over 9,000 temporary construction jobs, including direct and indirect jobs; vi) spurring of economic development and produce reliable revenue streams for the benefit of the public; vii) requiring the developer to pay prevailing wage and encourage local, MBE, WBE and SDVOB
participation; and viii) diversification of the economic base for Belmont Park Racetrack, the Town and the County and the enhancement of economic benefit from the Project Sites in comparison with their current underutilized and deteriorated character.

The Proposed Project would increase commercial investment in the immediate study area, drawing direct investment through building construction, enhanced retail activity and destination shopping, increased event-based economic activity, and office and community space activities. It would introduce new workers and visitors to the area, thereby increasing the area’s spending power and benefiting existing commercial establishments. The Proposed Project’s operations also would provide opportunities to utilize local material and services during construction and future operations of all businesses: retail, arena, hotel, and office. Finally, the Proposed Project would introduce new uses and amenities—such as on-site open space, dining and entertainment-oriented retail, and a hotel—that would be available to visitors to Belmont Park. These uses would complement NYRA’s operations and would further its goal of enhancing the destination value of Belmont Park.

The adopted GPP includes specific findings that must be made for Civic and Land Use Improvement Projects under the UDC Act.

Please also see Appendix I, “Fiscal and Economic Benefits.”

**Comment 7-3:**

In Chapter 7, the DEIS states: “The Proposed Project would not result in any significant adverse environmental impacts due to changes in socioeconomic conditions; it would, however, create local jobs and positive economic synergies.” The DEIS’s discussion of economic benefits is fundamentally flawed because (1) by any rational assessment, the statement that the project “would not result in any significant adverse environmental impacts” is objectively false, and (2) the cost to properly mitigate traffic congestion that would be caused by this project by implementing physical improvements on the Cross Island Parkway would dwarf the claimed economic benefit in the DEIS. The proposer, NYAP, has not proposed this cost-prohibitive mitigation because it does not intend to pay for it. Instead, when congestion becomes intolerable, taxpayers will eventually foot the bill. (Curran_2564)

**Response 7-3:**

The DEIS text cited by the commenter does not suggest that the Proposed Project would not result in any significant adverse environmental impacts; it states that the Proposed Project would not result in any significant adverse impacts *due to changes in socioeconomic conditions.*

With respect to the suggested physical improvements to the Cross Island Parkway, please see the response to Comment 17-52. The objective of the SEQRA analysis is to identify measures to reduce significant adverse
environmental impacts of the Proposed Project to the maximum extent practicable consistent with social, economic, and other essential considerations.

**Comment 7-4:** There is concern that the job training benefit is unstructured. (Terry_TS4_1032)

**Response 7-4:** As described in the EIS, in keeping with NYAP’s goal to use the arena and other elements of the Proposed Project as a platform for innovation in live entertainment and guest experience, NYAP intends to create and operate facilities in this space that would provide educational and job training opportunities for students, young adults, veterans, and other community members interested in careers in: sports and entertainment (e.g., sales, technology and systems operations, event production, and journalism); hospitality (e.g., guest relations, manager training, marketing, sales); food and beverage (e.g., culinary skills training, food business incubation, food service training, urban agriculture) and retail (e.g., product management, visual merchandising, retail fundamentals, and manager training). Upon its conditional designation in December 2017, NYAP commenced discussions with leading New York-based enterprises to provide content and programming for the facilities to be incorporated into this component of the development, and NYAP is seeking community input—including at least three meetings with the Belmont Community Advisory Committee—in finalizing the program.

**Comment 7-5:** There is concern about the quality of jobs that would be created, particularly for building service workers. There should be a job plan to create skilled jobs (e.g., STEM) in addition to the low skilled jobs. What is the average new direct and indirect (part-time, seasonal, full-time, building trade) jobs that will be created? There is concern that the project will not generate enough jobs. (Amato_2362, BPCC_132, Compo_010, Form Letter 6, Gayron_FL6_110, Henry_2301, Kaminsky_TS1_845, McEnery_2338, McEnery_2340, Sexton_048, Sexton_TS1_876, Simpkins_SEIU_103, Simpkins_TS4_977, Talty_TS2_929, VFP_2548, Weickert_TS1_869)

**Response 7-5:** The Proposed Project would create a substantial number of temporary and permanent jobs. As detailed in Chapter 7, “Socioeconomic Conditions,” Tables 7-12 and 7-13 of the FEIS, construction activities associated with the Proposed Project would generate an estimated 9,240 full-time equivalent (FTE) temporary jobs. Once operational, the Proposed Project would generate an estimated 3,179 FTE permanent jobs; this includes an estimated 2,455 direct on-site FTE jobs and an estimated 724 indirect and induced FTE jobs within the region. The direct permanent jobs would be largely within the “Luxury Outlet Retail” and “Arena” introduced by the
Proposed Project. There would be a range of opportunities from high/managerial level jobs to entry level/low skilled jobs. Additional temporary jobs that would be generated by construction of the new LIRR Elmont Station are estimated in Appendix I.

Comment 7-6: There is concern that the retail will provide very few good paying, health benefit providing jobs. There is concern that the project overall will not provide high-paying jobs. (Cunningham_TS4_989, Sexton_TS4_1028)

Response 7-6: Value Retail, which would be the operator of the proposed luxury outlet retail space on Site B, anticipates hiring approximately 100 employees (increasing as the project stabilizes) with varying seniority whose pay would include benefits. Furthermore, at the retail village there would be approximately 150 brands, each of which is an independent employer—each store typically employs a manager, three assistant managers, and eight staff, totaling 1,800 full- and part-time brand employees.

Comment 7-7: The developer should support union labor and commit to a project labor agreement. (Aracich_TS4_985, BPCC_132, Form Letter 7, Gillen_TS3_934, Guerrero_TS4_986, Kaplan_TS4_967, Licari_TS4_1033, Majkut_TS4_980, Marinacci_TS4_998, Nicolello_TS2_925, Nicolello-Muscarella_2107, Rodier_FL7_2151, Simpkins_TS4_977, Solages_TS1_855, Solages_TS4_995)

Response 7-7: This comment is beyond the scope of SEQRA. The Applicant team has a 40-year history of being fully supportive of union labor. The Proposed Project is no exception. Extensive outreach to all legally recognized union firms are ongoing. There is a full prevailing wage requirement and the developer is open to a project labor agreement as long as it does not come at the exclusion of all other qualified firms including MWBE and SDVOB firms that pay prevailing wages to their workers.

Comment 7-8: The project will provide jobs and ensure local opportunities. (Kaplan_2550, Williams_TS4_1005)

Response 7-8: Comment noted.

Comment 7-9: The project must include a plan for MWBE and SDVOB, and specify the percentages. (BPCC_2200, Comrie_104, Comrie_134, Comrie_TS4_968, Milazzo_2203, Solages_TS4_995)

Response 7-9: ESD’s Non-Discrimination and Contractor & Supplier Diversity policies would apply to this Project. The Developer shall be required to include minorities and women in any job opportunities created, to solicit and
utilize MWBEs and SDVOBs for any contractual opportunities generated in connection with the Project and shall be required to use Good Faith Efforts (pursuant to 5 NYCRR §142.8 and 9 NYCRR § 252.2) to achieve an overall MWBE Participation Goal of 30 percent and an overall SDVOB goal of 6 percent related to the total value of the Project. The overall MWBE goal shall include a MBE Participation Goal of 15 percent and a WBE Participation Goal of 15 percent.

Comment 7-10: There should be internships for local students enrolled in specialty programs. The "opportunity to apply" is not sufficient. (Milazzo_2203)

Response 7-10: Internships would be provided to students on a regular and ongoing basis. The Applicant would hire interns once construction begins. The Islanders have anywhere from 15-20 interns during the year. Value Retail has internships throughout the year at other developments and would do so at the proposed retail village.

Comment 7-11: There should be a centralized communication hub (perhaps a dedicated website for each community) where the community can be provided with job opportunities and internships approximately two weeks before the general public. It is recommended that said hub provide a method for community members to sign up for email or text alerts as job opportunities arise. It is important that these opportunities be brought to the community and not just “made available” to them. (Milazzo_2203)

Response 7-11: NYAP would proactively target local residents and local businesses via online postings of opportunities, on-site job fairs, and partnerships with local organizations, schools, and governments. NYAP would also host on site job training and offer internships to help prepare future employees. Where possible and practical, local candidates and businesses would be preferred.

Comment 7-12: Overriding concerns about the Project is the fact that kids will have new job opportunities. A lot of people in our community appreciate the opportunity for minimum wage jobs. (Swaby_TS1_885)

Response 7-12: Comment Noted.

ECONOMIC SYNERGIES

Comment 7-13: What are the local materials, inputs and services mentioned on p. 7-16, “the development would provide opportunities to utilize local materials,
inputs, and services during construction and for future operations of all businesses.” (VFP_2548)

Response 7-13: NYAP would encourage all subcontractors to utilize local businesses when procuring materials that would go into the construction of the Project.

DIRECT BUSINESS DISPLACEMENT

Comment 7-14: Direct Business Displacement (Pages 7-2 & 7-17): Besides the remaining Backyard space that will be left, please specify in more detail which other locations within Site A are being considered for potential Backyard-type activities. Are any of the Site A locations that are under consideration located near the property borders of residential homes? (Curran_2564)

Response 7-14: Based on ESD meeting with NYRA, ESD understands that NYRA is developing a plan to relocate backyard amenities and activities to suitable alternate locations. Larger events that have been held in the Belmont Red Lot or South Lot (currently 3-4 day events, approximately 3 to 5 times a year) are expected to continue in the South Lot, but would require coordination between NYRA and NYAP. NYAP also would coordinate to host events within the Proposed Project's new open spaces on Site A, which are not located near the property borders of residential homes.

POTENTIAL COMPETITIVE EFFECTS – RETAIL

Comment 7-15: The proposed retail will have adverse competitive effects on existing local area retail businesses. (Alexander_TSI_887, Anonymous_083, BPCC_132, Culotta_2365, Culotta_2572, Horn_TSI4_982, Jacob_TSI3_954, Jacob_TSI3_954, Licari_TSI1_883, McCaffrey_TSI4_976, Talty_TSI2_929, Weickert_TSI1_869)

The DEIS states "the proposed retail uses would complement, rather than directly compete with, existing retail facilities in the area." How has this issue been studied or is it merely ESD's unsupported opinion? (VFP_2548)

Response 7-15: Chapter 7, “Socioeconomic Conditions,” includes a detailed analysis of potential competitive effects on existing local area retail businesses. That analysis found “leakage” of expenditure potential within the local market, meaning that there is more consumer expenditure available than is currently being captured by local retail establishments. The analysis found that even when accounting for additional sales associated with the Proposed Project, there would continue to be substantial unmet local consumer demand. Additionally, the proposed retail village would attract a regional consumer base, many of whom do not regularly frequent local retail establishments, and the retail village contains retail offerings that do not currently exist in the area. For these reasons, it is unlikely that the
Proposed Project’s retail would compete for the consumer spending that is currently captured by retail in the study area. Rather, the Proposed Project would bring new consumer expenditure potential into the local economy that would have an indirect beneficial “spillover effect.” The new expenditure would be captured by the Proposed Project, as well as by existing and new stores that may locate in the future. An example is a consumer who may travel to the area to shop for clothing, and also may spend money at existing stores on things like gasoline and food.

Value Retail’s project is designed to attract sophisticated, global customers who normally pre-plan their trip and frequently travel great distances to visit. In addition to providing a distribution channel for surplus goods, Value Retail’s primary business is to be a point of customer acquisition for its brand partners, which benefits its partners’ full price networks, some of which are sold in existing malls in the area. Value Retail’s business does not compete with full price retailers; it is complementary, as can be seen in France, where Value Retail’s La Valee Village is immediately adjacent to Klepierre’s Val d’Europe, a full price retailer. Similarly, another full price shopping center, the Westgate Oxford Centre, invested 500MM pounds to expand 800,000 sf to benefit from its proximity to Value Retail’s Bicester Village.

Comment 7-16: The DEIS states that the outlet mall will complement rather than compete with existing retail in the area. Please provide data to support how it will complement Green Acres Mall, Americana Mall, and Roosevelt Field. Does any existing retail outlet or mall location (within Long Island) have any ownership in Value Retail PLC? Would this create a situation of competition with existing outlet malls/malls in the area? (VFP_2548)

Response 7-16: Value Retail’s “retail village” project is designed to attract sophisticated, global customers who normally pre-plan their trip and frequently travel great distances to visit. This is a different marketing model from the malls identified in the comment. In addition to providing a distribution channel for surplus goods, Value Retail’s primary business is to be a point of customer acquisition for its brand partners, which benefits the partners’ full price networks. Value Retail’s business does not compete with full price retailers, some of whom sell products in the shopping centers identified in the comment; it is complementary, as can be seen in France, where Value Retail’s La Valee Village is immediately adjacent to the full price Klepierre’s Val d’Europe (their highest performing asset in its portfolio). Similarly, in England, the full price shopping center Westgate Oxford Centre invested 500MM pounds to expand 800,000 sf to benefit from its proximity to Value Retail’s Bicester Village. Furthermore, within the local area the capture rate analysis in Chapter 7, “Socioeconomic Conditions” shows there is unmet market potential, and
the Proposed Project would draw additional potential expenditure to the area based on the unique shopping opportunities, thus further supporting the conclusion that the Proposed Project retail would attract different consumers that would complement rather than compete with the area’s existing shopping areas.

NYAP does not have an ownership stake in any existing retail outlets or malls in Long Island.

Comment 7-17: The DEIS is deficient in not providing examples of how luxury outlet retail developments work in the United States. (BPCC_132, Williams_BPCC_012, Williams_TS1_850)

Response 7-17: There are currently no direct comparable development to Value Retail’s luxury outlet product within the United States. However, this is not necessary to evaluate the Proposed Project's potential to result in significant adverse environmental impacts. The nearest US model for the proposed luxury outlet retail village is Woodbury Commons in Orange County, NY although the proposed Belmont project is smaller. Simon Property Group, the operator of Woodbury Commons, reported 95.9 percent occupancy in 2018, and a 5.3 percent increase in sales per square foot from 2018 for its entire portfolio of outlet centers and Class A malls. Tanger Factory Outlet Centers, one of the nation’s largest outlet operators, had an occupancy rate of 95 percent at the end of Q1 2019. In 2016, real estate researcher Reis Inc. reported that covered malls, excluding outlets, had occupancy levels of only 92.2 percent. These metrics evidence a strong market for retail outlets similar to Value Retail’s luxury outlet product in the United States.

Comment 7-18: P. 7-27 states, “the capture rate of Elmont and Floral Park are much lower at 55.1 percent and 59.4 percent respectively.” How was that data established? (VFP_2548)

Response 7-18: The capture rate is a measure of business activity in a region and indicates the percentage of consumer expenditure that is being spent in the specified area. ESRI Business Analyst provides data on the potential consumer expenditure in an area and the total corresponding sales. The capture rate was then calculated by dividing the potential consumer expenditure by the actual consumer expenditure. Put another way, capture rates of 55 and 59 percent mean that less than 60 cents of every dollar of local area residents’ consumer spending is occurring within the local area, and suggests opportunity for additional retail offerings and sales without cannibalizing from existing sales.
Chapter 22: Response to Public Comments

Comment 7-19: The analysis does not consider how the Proposed Project would compete with existing local businesses, or with larger event/arena spaces within the region. (EAM_2563)

Response 7-19: Chapter 7, “Socioeconomic Conditions,” contains a detailed analysis of how the Proposed Project would compete with existing local businesses and with larger event/arena spaces within the region. The analyses found that the study area currently has excess demand for local retail that the Proposed Project would fill without harming local businesses. Additionally, the luxury retail component would have different retail products than what is currently found in the Study Area and would not directly compete with local retail uses. The arena and entertainment analysis found that the arena would also draw a large, regional audience and that the NYC metro area is sufficiently large enough to absorb increased economic activity without having adverse competitive impacts on similar existing venues in the region. The Proposed Project would also draw regional consumers to the area, creating additional demand for local retail and generating indirect economic benefits in the area.

POTENTIAL COMPETITIVE EFFECTS – ARENA

Comment 7-20: DEIS p. 7-5 discussed the impact on other arenas and venues but does not provide facts. It does not provide details on which acts would choose a new arena over the Nassau Coliseum or what the future of these acts are. If visitors to non-sporting events are only expected to travel from “a catchment area of no more than a 20-30 minute drive to the arena,” please explain how this catchment area overlaps with the catchment area of no more than a 20-30 minute drive to the NYCB Live: Nassau Veterans Memorial Coliseum. Please explain how such an overlap in catchment areas may impact demand at either venue. (Curran_2564, VFP_2548)

Response 7-20: The areas covering a 20- to 30-minute drive around the Proposed Project and around NYCB Live: Nassau Veterans Memorial Coliseum would overlap significantly. While many visitors at both venues originate in Long Island, both venues attract visitors from throughout the entire MSA, which is significantly large enough to absorb the additional supply of events and entertainment that the Proposed Project would provide. One venue might focus on larger shows, both venues could host the same acts on different nights, or perhaps host events marketed at different audiences.

Comment 7-21: Arenas and Entertainment Venues (Page 7-31): Table 7-21 “Performance Metrics for Key Competitor Arenas” does not provide post-renovation data for the NYCB Live: Nassau Veterans Memorial Coliseum. This analysis should be updated with current information on competitor arenas in the region. (Curran_2564)
Response 7-21: The FEIS includes the latest Pollstar data on metrics presented in Chapter 7, Table 7-21, including post-renovation data for NYCB Live: Nassau Veterans Memorial Coliseum.

POTENTIAL COMPETITIVE EFFECTS – HOTEL

Comment 7-22: Regarding hotel discussion on DEIS p.7-24: It is indicated that the primary trade area for analysis does not include Queens County because most hotels are intended to service airports and Manhattan overflow demand. However, due to the Proposed Project’s location along the Queens border, the primary trade area should include all of Queens County, or at minimum, the eastern half of Queens County. Additionally, include an analysis of which hotels in Queens County are also categorized as “upper upscale class.” Also, regarding hotel discussion on DEIS p.7-32: Due to variations in data depending upon hotel type/class, please provide 2013 to 2017 ADR, RevPAR and Average Occupancy rates for the “upper upscale class” of hotels in Nassau County and Queens County.

Response 7-22: As detailed in Chapter 7, the Queens hotel market was not included in the primary trade area because most hotels in Queens are intended to service airports and Manhattan overflow demand (primarily in Long Island City). The supply of hotels in eastern Queens, for the most part, is smaller and of lower quality than the proposed Belmont hotel. There are four hotels in the entire Queens borough that STR, a hotel data and benchmarking firm, classifies as “upper upscale,” and they all primarily serve the two airports in the borough: Marriott New York LaGuardia; Sheraton Hotel LaGuardia East; Hilton New York JFK Airport; and Sheraton Hotel John F Kennedy Airport. Of the 12 hotels in Queens that STR classifies as simply “upscale,” 7 serve either JFK or LaGuardia Airports. The remaining five are all located in Long Island City and serve a very different market than that of eastern Queens or Nassau County. In the eastern Queens neighborhoods of Floral Park, Bellerose, Howard Beach (not primarily serving JFK) and Flushing (not primarily serving LaGuardia), STR identified 15 hotels, 10 of which were classified as Economy and the remainder Midscale. The STR Trends Data that tracks ADR, RevPAR and average occupancy rates for hotels by geography does not track these trends by hotel class, so a disaggregated overview of these trends by hotel class cannot be provided. This information is included in Chapter 7, “Socioeconomic Conditions,” of the FEIS.

OTHER

Comment 7-23: The DEIS states on p. 7-19 that the Proposed Project would not introduce significant adverse environmental effects within residential...
Chapter 22: Response to Public Comments

Response 7-23: The DEIS statement on page 7-19 was not related to retail investment; rather, it considers whether the Proposed Project could alter land uses in a way that could impede efforts to attract residential investment or create a climate for residential disinvestment. The analysis considers operational conditions in 2021 with the Proposed Project and with mitigation measures in place. Based on analyses performed as part of Chapter 17, “Mitigation,” of the EIS, all identified significant adverse environmental impacts within local neighborhoods could be fully mitigated with the exception of two traffic intersections. The analysis in Chapter 7, Socioeconomic Conditions,” also considered that the Proposed Project would increase commercial investment in the immediate study area, drawing direct investment through enhanced retail activity and destination shopping, increased event-based economic activity, and office and community space activities. It would introduce new workers and visitors to the study area, thereby increasing the area’s spending power and benefiting existing commercial establishments. With respect to retail investment, the EIS capture rate analysis set forth in Chapter 7 shows there is unmet market potential, and the Proposed Project would draw additional potential expenditure to the area based on the unique shopping opportunities that would be presented.

Comment 7-24: There is concern that patrons won’t return once they experience the difficulty of getting there. There is concern that traffic will drive existing and new businesses out of the area. (Caldon_TS2_910, Milazzo_2203, Walsh_1040)

Response 7-24: The EIS analysis identifies mitigation for the Cross Island Parkway and the local street network in order to reduce vehicle traffic to address the concern expressed. The EIS traffic analysis is based on a reasonable worst case scenario of a sold out NHL hockey game, something that is estimated to occur only a few instances each year and not a persistent condition. Consumers are expected to continue to get to local businesses for day-to-day services, and the increase in mass transit services such as a new LIRR Elmont Station would provide additional options for customers as well as reduce significant adverse traffic impacts.

Comment 7-25: The DEIS fails to analyze substitution effects (disposable income) and leakage (measure the dollar recirculated) in the community as opposed to sports “destination” facilities. Many studies are available to analyze. Pick one out of the 48 host communities in America. (BPCC_2108)

Response 7-25: The requested analysis is purely economic in nature, beyond the scope of SEQRA, and is not necessary to identify the potential for significant
adverse environmental impacts under SEQRA. The analyses presented in the EIS are consistent with the Final Scope of Work and SEQRA requirements. Chapter 7, “Socioeconomic Conditions,” of the EIS also provides a detailed economic impacts analysis for each component of the Proposed Project, including the arena. The economic impacts analysis details the estimated indirect and induced jobs and economic output that would be generated by the Proposed Project. The indirect and induced economic output provide an estimate of the direct expenditure recirculated in the community.

Comment 7-26: There is concern about the project's impacts on property values. (Compo_010, BPCC_132, Culotta_2365, Culotta_2572, DAmico_088, Form Letter 5, Giraldo_035, Greene_TS2_924, Lyons_FL5_038, Lyons_FL5_038, Maurer_TS2_931, McDonald_TS1_882, McGuire_TS2_912, Post_091, Weickert_TS1_869)

Response 7-26: Under SEQRA, potential impacts relating to lowered real estate values are considered economic, not environmental, and therefore are beyond the scope of this SEQRA review and not the subject of environmental review except to the extent lowered property values could result in significant adverse socioeconomic conditions or result in significant adverse impacts on community character. Chapter 7 considers that potential and concludes that the Proposed Project would not introduce uses that could offset positive trends in the area, impede efforts to attract investment to the area, or create a climate for disinvestment.

Comment 7-27: There is no discussion on how the active use of the North and East lots will impact existing home values near or adjacent to them. (VFP_2548)

Response 7-27: The EIS analysis focuses on potential environmental effects, not the effects on specific home values because purely economic impacts are beyond the scope of SEQRA review. The analysis presented in Chapter 7, “Socioeconomic Conditions,” concluded that the Proposed Project would not have significant adverse effects on the local residential market because, among other factors, the expanded use of the North and East lots for its well-established parking uses is not expected to result in significant adverse impacts to the residences near those lots. Please also see the response to Comment 1-56.

Comment 7-28: The planned train line will provide commuters access to New York City on a daily basis. This will not only provide the people of Elmont easier access to mass transportation but their property values on their homes will go up because of it. (Fiumara_2265)

Response 7-28: Comment noted.
Chapter 22: Response to Public Comments

Comment 7-29:  Due to the inaction of the Town of Hempstead and shifting budget priorities of ESD, Elmont missed an opportunity to use grant monies to update the downtown area. Elmont requires a serious grant investment from the State prior to the completion of any development at Belmont Park. (Solages_2402)

Response 7-29:  The awarding of grants for improvements along Hempstead Turnpike is not part of the Project, though the Project doesn’t preclude the future awarding of grants. The Project is expected to generate new revenue in the form of PILOT and sales taxes for the local municipalities and service districts.

Comment 7-30:  There is concern that the community must host events but would not be able to afford tickets to them. (Forbes_TS4_1021, Sferlazza_2263)

Response 7-30:  As described in Chapter 7, “Socioeconomic Conditions,” the median household income within the approximately 1/2-mile study area surrounding the Project Sites and other directly affected areas is approximately $90,000. According to the U.S. Department of Labor Consumer Expenditure Survey (CES) data, households earning between $80,000 and $99,999 annually spend approximately $3,373 on “entertainment” expenditures, including $741 annually for “fees and admissions.” FEIS Table 7-21 shows that the average ticket price from 2012 to 2019 for events at comparable arenas in the area varies from approximately $60 to just over $100. While the Proposed Project would host a variety of entertainment events at varying price points, the data suggests that the average event would be affordable to many local area residents.

Comment 7-31:  The Belmont Racetrack facility has long been a major tourist destination in Long Island, and one of our region’s economic development foundations. With the recent announcement of the plans to redevelop Belmont Park, it is critically important that we maximize the immediate economic development opportunities this redevelopment project provides, while simultaneously ensuring the long-term health and success of horse racing at Belmont Park. Horse racing within our community has been a loved tradition and it is important that we preserve this tradition through track improvements, the acceptance of night racing, and continued consideration of all neighboring communities. (Solages_2402)

Response 7-31:  The EIS analyses account for NYRA’s planned improvements at Belmont Park and conservatively assume their completion by the 2021 analysis year.
HAZARDOUS MATERIALS

Comment 8-1: It appears as per DEIS p. 8-4 that the area to be excavated for the underground parking and new substation has not been established yet. (VFP_2548)

Response 8-1: The EIS analyses of hazardous materials cover all on-site areas where there potentially would be excavation. The locations for parking and the new electrical substation are shown in EIS Figure 1-2. No specific concerns were identified at the North Lot (or the location of the proposed substation immediately to the west). See also Appendix C, “Hazardous Materials,” for Phase II reporting for the Project Sites, including the locations of soil borings in Figure 2.

Comment 8-2: Have soil samples been taken from Site B testing for chemicals in the soil and where are the results? Was petroleum or diesel fuel found in the soil of Parcel B? What was the use of Site B from 1905 to 1950? (VFP_2548)

Response 8-2: Soil samples were collected from within the Site B area in February-March 2018. No evidence was present of petroleum or diesel fuel in soils above NYSDEC’s Unrestricted Use Soil Cleanup Objectives (UUSCO). The results of Phase II testing are provided in Appendix C of this FEIS.

Belmont Park Racetrack and the Belmont Park LIRR station were opened in 1905. The Belmont Park facility including the racetrack, facilities, parking areas, and grandstand was built north of Hempstead Turnpike partially in Site A. The Belmont Park LIRR Station was constructed in the northern section of Site B. The LIRR track was present in Site B from 1903-05 and remained there until at least 1954. The LIRR station was moved from Site B to west of Site A between 1954 and 1961. The remainder of Site B was and had remained mostly vegetated until a parking lot was created in the area sometime between 1966 and 1976.

Comment 8-3: The DEIS on p. 8-2 identifies properties that had spills of hazardous materials or oil. Where are the details of these reports, specifically the one regarding the LIRR maintenance yard? (VFP_2548)

Response 8-3: The LIRR maintenance yard, which abuts the Queens Village Bus depot, is located directly to the northwest of Site A. A Phase I Environmental Site Assessment (ESA) performed for NYRA by O’Brien and Gere, Inc. in October 2017 (for the entire Belmont Park property) identified unknown fill material and stockpiled railroad ties. Railroad operations in this area are associated with impacted soil from historic fuel spills. In addition, long-term storage of railroad ties may have resulted in the leaching of creosote and other hazardous constituents into soils at this off-site LIRR maintenance yard. This area was considered to be a
Recognized Environmental Condition (REC) based on its historic railroad use and its proximity to the Belmont Park property.

**Comment 8-4:** Were samples taken within the vicinity of the first train platforms on Site B on the immediate south side of Hempstead Turnpike? (EAM_2563)

**Response 8-4:** Waste characterization soil sample (B-500P) and a soil sample (B-502), taken during the February-March 2018 Phase II site investigation performed by Roux Associates at locations shown on “Plate 2” in Appendix C, are located approximately where the first train platforms on Site B were located. The results of the analytical testing of these soil samples are contained in the report. The Phase II investigated the RECs identified in the Phase I ESA and were eliminated as a concern based upon the results (see Phase II in Appendix C). There were no areas identified during the Phase II investigation that warrant additional delineation sampling and the groundwater and soil vapor results were also not indicative of any offsite contamination migrating to the site.

**Comment 8-5:** Per NYSDEC requirements, a Stormwater Pollution Prevention Plan (SWPPP) providing Erosion and Sediment Control Measures will be prepared for this activity. Please provide NCDPW with a copy of the SWPPP when available. (Curran_2564)

**Response 8-5:** The SWPPP is being prepared and following review and approval by NYSDEC, a copy would be provided to NCDPW.

**Comment 8-6:** In Section 5.1 of the Phase I Environmental Assessment (Environmental Database Review), a reference was made to NYSDEC spill #0750166 resulting from ignitable waste dumped in drywell. No reference is made to this spill incident being closed by NYSDEC. (Curran_2564)

**Response 8-6:** The spill incident (unknown quantity of paint solvents on 4/30/07) was closed by NYSDEC on 3/25/08. The spill is discussed as being closed by NYSDEC in the 2nd bullet on p. 13 of the Phase I ESA. Generally, when a spill case is closed by NYSDEC, it is because the records and data submitted indicated that any necessary cleanup and removal actions were completed and no further remedial activities were necessary.

**WATER RESOURCES**

**GENERAL COMMENTS**

**Comment 9-1:** Proper concern, care and planning to protect water resources should be incorporated into the planning process. (Alfonsi_1044, Esposito_CCE_141)
Response 9-1: ESD and NYAP are working with the WAWNC and the NCDPW regarding the protection of water resources. A sewer availability letter was issued for the project by the NCDPW and is included in Appendix A. See also the response to Comment 9-3 regarding measures to be employed to protect groundwater resources, including water conservation measures, on-site recharge and, where there is off-site recharge, installation of water quality pre-treatment units upstream of the storm sewers.

Comment 9-2: All studies and assumptions in this section do not take into account any future improvements that NYRA is making. Would the combined effect be detrimental to not only the surrounding communities but the projects themselves? The HydroCAD® analysis does not account for the future NYRA improvements to drainage within the existing Racetrack. (VFP_2548)

Response 9-2: The EIS indicates that NYRA’s improvement activities would include, “...the rebuilding of the existing outer dirt track and the two inner turf tracks within their current footprints in order to provide for greater safety, better drainage, and an improved irrigation system. At this time, NYRA is still analyzing and considering these improvements along with other track improvement options. The analysis for the Proposed Project does not account for any improved drainage within the existing racetrack as part of the water resources analyses in Chapter 9 because NYRA’s improvements would have no effect on the drainage system for the Proposed Project.

GROUNDWATER RESOURCES

Comment 9-3: There is general concern about the potential strain/impacts on water resources. (BPCC_132, Conway_TS4_1035, Moriarty_TS4_1004, Trentacoste_TS2_902, Cunningham_TS4_1023) The DEIS is insufficient to determine potential impacts to the aquifer (generally and in times of low precipitation), its long-term sustainability, drinking water, water use, plume migration, other water resources. (Alfonsi_1044, Esposito_CCE_141) There is concern over potential impacts to Long Island’s aquifers. What measures will be taken to ensure that the aquifers are protected from potential contamination? (Moriarty_TS4_1004, Moriarty_2144) The project poses serious risks to water quality and could compromise the sustainability of our water supply. (Weiner_SSAS_2097) What is the impact on the sustainability of the aquifer? What measures will be taken to ensure that the aquifers will not be damaged by the
development of this project including the underground parking garage?
(Esposito_TS1_848)

There is concern with the surface and groundwater analysis. (BPCC_132)

**Response 9-3:**

As detailed in Chapter 9, "Water Resources," the Proposed Project would employ measures to minimize impacts to the aquifer. The Proposed Project would be connected to the municipal water system and would be supplied water by the WAWNC with the construction of a new main in Hempstead Turnpike. As with any other property in the WAWNC service area, the Proposed Project would be subject to any water use restrictions imposed by the WAWNC, including in times of low precipitation.

In order to minimize impacts associated with water use, the Proposed Project would employ a number of water conservation measures, as follows. Site A: achieving 20 percent or more potable water reduction for landscape irrigation water demands; saving over 35 percent potable water through the use of low-flow and low-flush fixtures, including pint-flush urinals, and low-flow showerheads; incorporating base-building and additional water subsystem meters for the irrigation and boiler water subsystems to track usage and identify leaks, contributing to long-term operational water savings; and conducting local water sample tests to identify water quality parameters necessary in optimizing the cooling tower cycles, systems operation, and reducing the make-up and blow-down process water use during the operational phase of the Arena. On Site B: achieving 30 percent or more potable water reduction for landscape irrigation water demands; saving over 20 percent potable water through the use of low-flow and low-flush fixtures, including pint-flush urinals, and low-flow showerheads; and incorporating base-building and additional water subsystem meters for the irrigation and boiler water subsystems to track usage and identify leaks, contributing to long-term operational water savings.

Since the Project Sites would be connected to the Nassau County sewer system, there would be no recharge of sewer effluent to the ground. Therefore, there would be no potential for contamination to groundwater from sewage effluent generated by the Proposed Project.

Stormwater would be recharged on site via leaching pools installed in various portions of the Project Sites and the North Lot. Stormwater that is piped off-site would ultimately reach the Nassau County recharge basin near Dutch Broadway. Pre-treatment structures would be installed upstream of the connection to the County infrastructure to minimize impacts from stormwater runoff to groundwater resources. Furthermore, the sand under the site would act as a natural filter, minimizing transport of potential contamination to the aquifer. No water wells would be dug on site for any purposes, including irrigation.
Based upon Phase II investigations, there is no data to suggest the presence of an on-site plume of contaminants at the Belmont Park property. The Phase II testing found no VOC exceedances of applicable standards and only low-level exceedances of applicable standards with respect to select metals, bezo(a)anthracene, and 4,4’-DDT in groundwater.

Groundwater on Site B, where a partially below grade parking garage is proposed, is located at approximately 35 feet below grade surface, as indicated in Chapter 9, “Water Resources.” The anticipated elevation of the parking garage footings is 15 feet below the surface grade at the location of the groundwater readings (soil borings) taken at Site A. As the groundwater depth was found to be 35-40 feet below grade, no dewatering of the site is anticipated.

Comment 9-4: Clear commitments on water reduction should be outlined. Water use strategies should be included in the DEIS, for both indoor and outdoor water usage. Where irrigation is necessary, smart controllers, drip irrigation, and moisture sensors should be used. Indoors, the project should mandate the use of Water Sense fixtures that reduce water usage, as outlined in the LEED green building rating systems. (Alfonsi_1044, Esposito_CCE_141)

Response 9-4: As discussed in Chapter 9, “Water Resources,” the Proposed Project would incorporate low impact design (LID) and green infrastructure. Irrigation systems would be equipped with rain sensors and drip irrigation is expected to be used in order to reduce water usage. In addition, numerous trees are proposed to be retained on Site A between the proposed hotel and arena, and pervious pavement would be installed around the trees to increase the amount of infiltration associated with these features. Where existing vegetation around the perimeter of Site B would be removed, it would be replaced and supplemented as part of the design of the vegetated buffer. The retention and addition of vegetation would increase evapotranspiration, a process by which water is transferred to the atmosphere by evaporation from soil and by transpiration from plants. This would assist in reducing stormwater runoff.

See response to Comment 9-3 regarding indoor water conservation measures. The Applicant would target Leadership in Energy and Environmental Design (LEED) v4 certification.

Comment 9-5: How much water will the proposal consume each year including irrigation? (Esposito_TS1_848)

The DEIS should assess the amount of water that the project would consume on a yearly basis. This amount should include water for
irrigation purposes since this can be a significant portion of a project's water withdrawal. The DEIS states the proposed project is estimated to have an average daily water demand of 135,925 gallons per day, excluding irrigation, however there is no justification for this withdrawal rate. The same number is used when identifying the quantity of waste water generated by the proposal. It seems highly improbable that the amount of waste water generated will equal the water withdrawal. (Alfonsi_1044, Alfonsi_2538, Esposito_CCE_141, Esposito_TS1_848)

The amount of water needed for basic services (e.g. toilets, landscaping) are not mentioned. (VFP_2548)

The DEIS did not analyze the water resources to be used. How much water would be used and where would it come from? The DEIS does not offer facts to support the statement that there would be no significant adverse impacts to water resources. It does not state where the estimate of 136,000 gallons per day comes from. (Esposito_TS1_848, Solages_TS4_995)

**Response 9-5:**

The water resources to be used would come from the wells of the WAWNC. Table 3-3 in Chapter 3, “Community Facilities and Utilities” provides a breakdown of water use by project component for both Site A and Site B. The average daily domestic water demand for the proposed redevelopment of Sites A and B is estimated at approximately 135,925 gpd, with a peak water demand of 2,600 gpm. This estimate applies to both water demand and sewage flow. However, as further identified, the average daily domestic water demand does not include the total irrigation design during growing season for the Project Sites nor does it include the process water associated with the cooling tower.

The amount of irrigation was calculated and presented in the “Water Supply” section of Chapter 3. As previously noted, “the conservative estimate of the area to be irrigated is approximately 15 acres. This area includes the landscaping on Site B located over the underground parking garage. While this area is not considered pervious, since it is above the parking garage roof, it requires irrigation. Based on this, the total irrigation design during the growing season (about March 15 through November 15) is conservatively estimated at 50,000 gpd to 75,000 gpd.” Chapter 3 also stated that irrigation was not taken into account in the peak flow calculation as it was assumed that the irrigation system would not be used during peak usage of arena/retail. Furthermore, the WAWNC was informed about the estimated amount of irrigation both in written correspondence and during meetings with the applicant.

In addition, cooling tower makeup water is roughly 160 gpm total, all units.
Comment 9-6: Have you designed the building to catch rain water and store it to use to flush toilets and use to wash and water the property? Will you have a green house on the roofs of all developed business to ensure that all vegetation prepared on the property comes directly from your property first? How about renting the space to bee keepers since we have had such a decline to our bee population due to chemicals in certain products. Studies have shown that using roof tops as open gardens reduce the amount of heat in that area in which that garden is developed. (Moriarty_2144)

ESD should incorporate green-roofs into the construction of new buildings on the site. (Culotta_2572)

Response 9-6: The buildings have not been designed to capture and re-use rainwater. Greenhouses and the rental of roofs for any purpose are not proposed for the buildings on the Project Sites. Green roofs are not proposed; however, as noted in Chapter 14, “Climate Change,” the buildings would have high-albedo roofs to reduce energy consumption and reduce the buildings contribution to the urban heat-island effect. There are no current plans to provide space to beekeepers.

Comment 9-7: Please provide the concentrations of the NYSDEC AWQSGVs that were detected at the site. (Swartz_WAWNC_2175)

Response 9-7: The WAWNC requested and has been provided with data reflecting concentrations of the NYSDEC Ambient Water Quality Standards and Guidance Values in samples collected in groundwater. These were discussed, in part, in Chapter 8, “Hazardous Materials,” and are included in the Phase II Environmental Site Assessment that was prepared for the Proposed Project (see Appendix C).

Comment 9-8: It is stated that depth to groundwater in the vicinity of the Project Sites is between 35 to 40 feet. The groundwater levels on the Water Authority’s properties that are opposite the site are approximately 12 to 15 feet below grade. The depth of the groundwater on the project site should be reviewed to verify the depths of the groundwater. (Swartz_WAWNC_2175)

Response 9-8: As indicated in Chapter 9, “Water Resources,” April-May 2016 USGS Geospatial Dataset of Water-Table and Potentiometric-Surface Altitudes in the Upper Glacial, Magothy, and Lloyd Aquifers beneath Long Island, New York, (“2016 Geospatial Dataset”) indicates that the depth to groundwater in the vicinity of the Project Sites and other directly affected areas is between approximately 35 to 40 feet. This is also shown on Figure 9-1. These depths were further confirmed by on-site data gathered as part of the Phase II ESA prepared by Roux Associates where the soil
Comment 9-9: Please provide all water conservation and reuse measures considered for this project. (Moriarty_2144, Swartz_WAWNC_2175)

Response 9-9: Re-use measures for water are not contemplated for the Proposed Action. However, water conservation measures would be undertaken, as described in response to Comment 9-3.

Comment 9-10: This Project will impact the Water Authority’s ability to meet NYSDEC requirements to reduce pumpage. (WAWNC_2175)

Response 9-10: Since the Proposed Project represents new development on the Project Sites, it would not be included in the WAWNC’s analysis for reduction of existing pumpage required by NYSDEC. However, water conservation measures, as described in response to Comment 9-3, would be implemented to reduce water usage on the site.

Comment 9-11: There are several groundwater plumes surrounding the Belmont Park Redevelopment proposal. The DEIS should assess if the increases in water withdrawal will impact the directional flow of any of the migration pathways of those plumes. It is significant to assess if the plumes would shift course which may hinder remediation efforts underway. (Alfonsi_1044, Esposito_CCE_141, Esposito_TS1_848)

Response 9-11: As stated in Chapter 9, the water demand for the Proposed Project would be served by the WAWNC. The WAWNC has not advised that the water demand from the Proposed Project would affect any plumes that may be located in the vicinity of the WAWNC’s water supply wells.

Comment 9-12: It is stated, “As identified in Chapter 8, ‘Hazardous Materials,’ groundwater samples were analyzed in comparison to the NYSDEC AWQSGVs in which no exceedances for VOC or PCBs were identified. Though, six out of nine samples had traces of SVOCs, metals, and/or pesticides that exceed AWQSGVs.” Please provide all results of the analyses. Were nitrates tested for, if so what are their levels? (Swartz_WAWNC_2175)

Response 9-12: The Phase II ESA with the results of the analyses has been provided to the WAWNC since the time of this comment and are available in Appendix C of this FEIS. Review of the Phase I ESA performed by NYRA for the Belmont Park property was undertaken by Roux Associates, the environmental consultant to the Applicant. According to the Phase I ESA, Site A was undeveloped until sometime between 1903 and 1924, when it was developed as an asphalt-paved parking area. In the same timeframe, an LIRR station was constructed within Site B. Site A
was reportedly historically also used as a paddock area. The LIRR station on Site B moved west of the Project Sites by 1961, and Site B remained mostly vegetated until a parking lot was created sometime between 1961 and 1976. According to a review of historical aerial photographs, the North Lot was vacant from 1951 and was used from 1980 as an unpaved parking area. This area was paved in 1994 and continues to be used as a paved parking area to this day. There were drums and soil stockpile areas noted during the site inspection conducted in 2017 in the area of the North Lot.

Nitrates are associated with wastewater, sewage disposal, fertilizer and agricultural uses. The past uses on parcels that would be disturbed as part of the Proposed Project do not suggest that they would have been a source of nitrates. Therefore, sampling for nitrates in this area was deemed not necessary.

Comment 9-13: It is stated that there was no evidence found of significant contamination of groundwater. The Water Authority has a number of public drinking water wells south of Hempstead Turnpike and west of Plainfield Avenues in Elmont that are contaminated with volatile organic compounds ("VOCs"). There are a total of eight (8) wells that require air-stripping facilities to remove the VOCs from the drinking water. The VOCs in the Water Authority wells are Tetrachloroethene ("PCE") and Trichloroethene ("TCE"). There are also wells owned by the New York City Department of Environmental Protection to the west of the site that are contaminated with VOCs. How can the groundwater in the middle of this area not have groundwater contamination? Please provide test parameters and the results. Insufficient testing would nullify this statement. (Swartz_WAWNC_2175)

Response 9-13: The Phase II ESA performed by Roux Associates establishes that there are no VOC exceedances of applicable standards and only low level exceedances of applicable standards with respect to select metals, benzo(a)anthracene, and 4,4’-DDT were identified in groundwater. The Phase II ESA was not previously included in DEIS, but has been provided to the WAWNC and is available in FEIS Appendix C.

Comment 9-14: It is stated that there will be no impacts to groundwater from sewage disposal since there is no sanitary discharge to the ground. What is the age, composition of the assets, and condition of the existing sanitary system? (Swartz_WAWNC_2175)

Under “Stormwater Runoff Infrastructure and Management,” please provide the age and condition of the existing 18-inch diameter connection on Site A, the existing 15-inch diameter connections for Site B and the existing connection to the 66-inch diameter storm water sewer in the...
Cross Island Parkway. If a survey was not performed to verify the condition, a survey should be completed. (Swartz_WAWNC_2175)

**Response 9-14:** Information and videos from camera tests of the pipes has been provided to the WAWNC.

On May 12, 2018, May 25, 2018, and November 29, 2018, Bohler Engineering, along with AARCO Environmental and Master Locators, performed jetting and video investigations of the existing storm connections to the Cross Island Parkway. The 18-inch pipe connecting Site A to the Cross Island Parkway was located, and it was determined that there is an obstruction in the pipe, potentially due to the construction performed to install the platforms at the LIRR station. The pipe would be repaired, or rerouted, as necessary prior to connection. The 15-inch pipes connecting Site B drainage to the Cross Island Parkway storm sewer were also located. Additional investigations would be performed prior to connection and if any obstructions are discovered in the 15-inch pipes the connections would be restored.

Further, on November 29, 2018 and December 7, 2018, Bohler Engineering, along with AARCO Environmental and Master Locators, performed jetting and video investigations of the existing sanitary main that runs parallel to the south side of the Grandstand, into which the proposed development would discharge. The pipe size was confirmed and appeared to be in good condition with no evidence of deterioration that would suggest leakage into the surrounding soils. Based on conversations with NYRA, it has not experienced any issues with the downstream sanitary main that connects into the NCDPW sewer interceptor located on the east side of the property. There is no reason to believe that the main downstream of the area investigated is in any different condition than what was observed.

**Comment 9-15:** CCE recommends the EIS quantify how this project plans to increase groundwater recharge and decrease impervious surface as compared to the existing infrastructure. (Alfonsi_1044, Esposito_CCE_141)

**Response 9-15:** As described in Chapter 9, “Water Resources,” overall, there would be a slight decrease in the total volume of runoff generated from the Project Sites in the post-development condition, due to a slight decrease in impervious surfaces resulting from the Proposed Project’s replacement of some paved areas with landscaping. Please see FEIS Chapter 9 for more detail on the Project’s stormwater strategies.

**Comment 9-16:** The development site sits on top of sole source aquifers for Queens and Nassau, and the project threatens to pollute the drinking water for three million people. The project would increase demands on a shrinking water
supply, exacerbate saltwater intrusion, and shift contaminants in the groundwater. The DEIS fails to analyze the water resources that would be used, and the determination of no significant adverse impacts is unsupported. The DEIS should also consider the Long Island Sustainability Study that was ordered by the Governor and is currently underway. (Weiner_SSAS_2097)

**Response 9-16:**

WAWNC has not indicated that provision of the requested amount of water would exacerbate saltwater intrusion. The WAWNC has stated that it can supply water to the Proposed Project with the installation of a new water main on the south side of Hempstead Turnpike from its existing well near Elmont Road.

Based on communications with WAWNC representatives and publicly available information, the WAWNC at present has testing and treatment measures in place to address existing contaminants.

The Long Island Sustainability Study has not yet been completed and, therefore, cannot be incorporated into the analysis. See also the response to Comment 9-3.

**Comment 9-17:**

In a letter dated May 21, 2018 from Bohler Engineering, the peak water demand for the project was given as 550 gpm. According to the DEIS the peak water demand for the project is 2,600 gpm. The Water Authority ran the hydraulic model of its system using both demands. The results indicated that the existing 12-inch water main in Hempstead Turnpike is not sufficient to meet these demands. This water main is also approximately 100 years old. A 20-inch water main is the minimum that must be installed to meet these demands. Also, an existing 10-inch water main in Crocus Avenue in Floral Park that could bring water to the site from the north was not sufficient to meet these demands. By increasing the size of the water main in Crocus Avenue, these demands could still not be met. The cost of installing a new 20-inch water main in Hempstead Turnpike from the Water Authority's facilities near Elmont Road is approximately $9,000,000 if half the width of Hempstead Turnpike needs roadway restoration. If the full width of Hempstead Turnpike requires roadway restoration the approximate cost would be $16,000,000. The Water Authority recommends installing a redundant system in order to supply water to the Belmont Arena in the case of an emergency, which would require the water main supplying Belmont needs to be shutdown. This distribution system redundancy will also provide protection to the remainder of Water Authority customers for uninterrupted water service. (Swartz_WAWNC_2175)

What type of infrastructure improvements are needed to connect the project components to WAWNC water lines? Where will those
improvements be located? I urge ESD to study these details in a Supplemental DEIS. (Culotta_2365)

Response 9-17: The peak water demand for the Proposed Project has been calculated at approximately 2,600 gallons per minute when considering all Project components. The WAWNC has stated that it can supply water to the Proposed Project with the installation of a new water main on the south side of Hempstead Turnpike from its existing well near Elmont Road. NYAP has been meeting with the WAWNC and would continue coordination to determine the appropriate routing and sizing of the new main and the pavement restoration methods associated with its construction.

Comment 9-18: The Water Authority has a 5-million gallon water storage tank at its location on the south side of Hempstead Turnpike opposite Plainfield Avenue. Normally this tank is filled at night during periods of low water usage. This allows the tank to be full to meet any water demands during the day. The Water Authority may be required to change the operation of its system if there are large demands for water at the Belmont Arena during the day which depletes the water levels in the storage tank causing a longer period of time to replenish water in this storage facility for targeted operational levels. This might require the use of additional wells and/or diverting water from other areas. (Swartz_WAWNC_2175)

Response 9-18: Based on NYAP’s communication with WAWNC, the WAWNC recognized that it would need to monitor its pumping operations and adjust filling timeframes, as necessary. Continuing communications with WAWNC have indicated that no new infrastructure would be required for storage purposes.

Comment 9-19: Table 21-1 states no significant adverse impact on community facilities, utilities, and water resources. An estimated 49.6 million gallons of water has a significant impact on WAWNC’s existing infrastructure and the operation of its pumping and storage facilities. (Swartz_WAWNC_2175)

Response 9-19: While the Proposed Project would require water and, therefore, place demands on WAWNC existing infrastructure, to serve the Project’s water demand NYAP has committed to the installation of a new water main on the south side of Hempstead Turnpike from WAWNC’s existing well near Elmont Road. Since the publication of the DEIS, NYAP has been meeting with the WAWNC and would continue coordination to determine the appropriate routing and sizing of the new main and the pavement restoration methods associated with its construction. With respect to the Project’s effects on WAWNC’s pumpage and storage facilities, please see the response to Comments 9-10 and 9-18. For these reasons, the Proposed Project would not result in significant adverse
impacts on WAWNC’s infrastructure and the operation of its pumping and storage facilities.

Comment 9-20: According to p. 9-4 no soil borings were done in the North or East Lots. Do they need to be done to determine the impact of any work done on those parcels? (VFP_2548)

Response 9-20: The historic uses on the North Lot do not indicate the likely presence of hazardous substances and therefore no further investigation is necessary. No improvements are being proposed in the East Lot and therefore no further investigation is necessary on that parcel either.

Comment 9-21: The section does not mention the potential of NYC tapping into the aquifers that are listed in the document. Was NYC contacted about the potential project and water usage? (VFP_2548)

Response 9-21: A discussion regarding the potential for New York City to tap into the aquifers is speculative and beyond the scope of this Project. The Project Sites are located within Nassau County and the jurisdiction of WAWNC. New York City has not been contacted with respect to water usage.

Comment 9-22: Exactly what pesticides will be used at the site and what are the quantities and uses? It's listed in the full Environmental Assessment Form that they are being used and I don't see it in the DEIS. (Alfonsi_2537)

Will you make a commitment to make sure that no Monsanto products will be used on this property? (Moriarty_2144)

Response 9-22: The type and quantity of pesticides to be used at the Project Sites are unknown as this time. However, their usage would be in accordance with prevailing regulations. All pesticides and herbicides used for routine landscape maintenance would be applied by licensed applicators in conformance with all product labels. The applicators would select the products to be used.

Comment 9-23: The Water Authority of Western Nassau County is only mentioned once on p. 9-10, "the proposed project would be supplied water by the WAWNC, for which well fields are located off-site." There is no analysis on the impact that the project will have on those well fields or the residents & businesses that depend on them. (VFP_2548)

Response 9-23: The Applicant has had several meetings with WAWNC. The WAWNC has not indicated there would be a significant adverse impact on its off-site wellfields.
SURFACE WATER AND WETLANDS

Comment 9-24: There is a water feature on Site A (an artificial ornamental pond) that is fed by municipal water supply and overflows to the storm sewer system. Can the water in the pond be recycled in order to conserve water? (Swartz_WAWNC_2175)

Response 9-24: As described in Chapter 9, “Water Resources,” the artificial ornamental pond is proposed to be eliminated as part of the Proposed Project. Correspondence with the United States Army Corps of Engineers, dated April 29, 2019, and included in Appendix D, indicates that the “delineated area [of the pond]…is considered to be excluded from consideration as a Water of the United States.” Therefore, no permit is required to remove the pond.

SEWER AND STORMWATER

Comment 9-25: There is general concern about water pollution. (Laguerre_105)

Response 9-25: The Proposed Project would be connected to the municipal sewer system, thus, there would be no discharge of sewage effluent on site. Furthermore, the stormwater runoff generated by the proposed development would be recharged on-site or after flowing through the storm sewer located within the Cross Island Parkway, ultimately discharging to Nassau County Recharge Basin #122 at Dutch Broadway. Please also see response to Comment 9-3 for a discussion of water quality treatment facilities to be installed.

Comment 9-26: The DEIS mentions using natural plantings and pervious surfaces as well designing on-site drainage systems including catch basins, drywells, trench drains, and infiltration for stormwater mitigation. CCE recommends the FEIS expand this section to include how these on-site drainage systems will reduce nitrogen, pesticides, fertilizers, and other common pollutants which degrade local water quality. (Alfonsi_1044, Esposito_CCE_141)

Response 9-26: As stated in Chapter 10, “Natural Resources,” where design allows, native plant species would be used in the anticipated landscaping. The use of native planting materials requires less maintenance, including less irrigation and less fertilizers and pesticides than vegetation that is not native to the area. The proposed stormwater management system has been designed to meet the requirements of the NYSDEC SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-15-002), as well as NYSDEC operational requirements.
See also the response to Comment 9-3 regarding the installation of water quality pre-treatment systems as part of the stormwater management system.

Comment 9-27: The Water Authority would like to obtain a copy of the HydroCAD® analysis performed for the site runoff discharge characteristics. (Swartz_WAWNC_2175)

Response 9-27: The HydroCAD® output is included in Appendix D of this FEIS.

Comment 9-28: It is stated that stormwater management systems would be installed to manage stormwater runoff. Belmont Park currently has stormwater discharge piping that crosses under Hempstead Turnpike at the eastern end of the site. This piping is connected to a 24-inch reinforced concrete pipe that transverse the Water Authority's property on the south side of Hempstead Turnpike opposite Plainfield Avenue. Records indicate this drainage line was installed by the Westchester Racing Association (Belmont Park) with an agreement with the former water service provider (Jamaica Water Supply Company). This piping connects to a Nassau County drainage culvert the runs parallel to Elmont Road. The 24-inch pipe should be evaluated as to its condition, replaced if necessary and to determine if it is sized properly. A formal easement and maintenance agreement should be entered into between the Water Authority and Belmont to insure the continued proper function and maintenance of the drainage in this location. (Swartz_WAWNC_2175)

Response 9-28: There would be no additional flow or impact from the Proposed Project to the existing drainage system on the eastern side of the property that is tributary to the NCDPW storm sewers described because the Proposed Project would not connect to the 24-inch reinforced concrete pipe referenced in the comment. Therefore, the request for a formal easement and maintenance agreement of this storm sewer is not necessary.

Comment 9-29: In the shared parking agreement, will any of the North/East/South lots be resurfaced? How are these lots currently drained and how will they lots be drained in the future? (VFP_2548)

Response 9-29: As described in Chapter 1, “Project Description,” of this FEIS, the North Lot, currently consisting mostly of gravel parking areas, would be resurfaced and restriped. The South and East Lots would remain in their existing paved condition. As mentioned in EIS Chapter 9, “Water Resources,” the North Lot currently flows to a pipe system that discharges at the existing pond in the North Lot. A system of drywells would be installed for the North Lot to capture and recharge runoff generated within the lot. A HydroCAD® analysis showing the existing
and proposed conditions has been conducted and is included in Appendix D of this FEIS.

The South Lot contains a drainage system that captures and recharges runoff associated with that parking lot; no improvements to the South Lot regarding drainage is proposed. The majority of stormwater runoff on the East Lot is sheet flow (or overland flow) with some shallow concentrated flow and no improvements to the East Lot regarding drainage is proposed.

**Comment 9-30:** There is no mention of the means and runoff of the cleaning of the North and East Lots. The document at a number of points states “are currently used as surface parking for Belmont Park, and they would continue to function in the same capacity with the Proposed Project”. However, the existing use is very different than active parking lot that will require constant cleaning. (VFP_2548)

**Response 9-30:** As described in Chapter 1, “Project Description,” the Applicant would enter into an agreement with the FOB and NYRA that would address the responsibility for maintenance of the North, East, and South Lots.

**Comment 9-31:** The potential for storm water runoff on the North Lot, once paved is not addressed. (EAM_2563)

**Response 9-31:** As identified on page 9-13 of DEIS Chapter 9, “Water Resources,” a system of drywells would be installed to capture and recharge the runoff generated within the North Lot. The runoff would flow into the system of drywells into an overflow pipe within the Cross Island Parkway. See also the response to Comment 9-15 for additional details regarding stormwater runoff on the North Lot. A HydroCAD® analysis detailing the existing and proposed stormwater runoff from the North Lot is included in Appendix D.

**Comment 9-32:** Existing storm water conveyance and recharge faculties may be undersized based on County drainage requirements. No Analysis provided assess the ability of these facilities to accommodate the project's storm water flow in a 100-year storm. (EAM_2563)

**Response 9-32:** The Applicant met with NCDPW to consult on the required stormwater storage requirements. Based on these meetings, the proposed stormwater management system has been designed to meet the requirements of the NCDPW. The drainage system proposed for the Project Sites and the North Lot have been designed to accommodate the 100-year storm.

**Comment 9-33:** On DEIS page 9-7 (under Stormwater), the pre-development condition, as described, states that the North Lot (22.2 acres) and the East Lot (17 acres) contain no existing drywells or stormwater control measures and the majority of the stormwater runoff is sheet flow (overland flow).
large portion of the North and South Lots, as well as all of the East Lot are outside the tributary area of NC Basin #122. These areas are within the watershed of the Elmont Drain System which ultimately contribute to surface waters. Physical control measures must be implemented to contain the required runoff on-site and to prevent silt/sediment from entering the adjacent Elmont Drain System. (Curran_2564)

Response 9-33: As part of the development of the North Lot, the Proposed Project would provide underground storage in leaching structures equal to a 2” rainfall over the watershed area. Hydraulic analysis using HydroCAD® indicates that the infiltration rate combined with the storage on-site would allow this system to safely pass the 100 Year storm. As there is no disturbance proposed to the South and East Lots, the existing drainage would be maintained.

Comment 9-34: DEIS p. 9-12 (Stormwater Runoff Infrastructure and Management) As indicated, the Proposed Project would include installation of a comprehensive stormwater management system to accommodate runoff for Site Areas A and B as well as the North Lot. The proposed comprehensive Drainage Plan should include drainage calculations and details for the number and type of structures proposed as well as the design criteria used for the sizing of the system. Roof areas should be included. (Curran_2564)

Response 9-34: Detailed drawings of the proposed stormwater system are neither necessary nor required for an analysis of significant adverse impacts under SEQRA. Civil design plans for the arena have been submitted. Once the design is advanced for the other Project components, they would be provided. These plans contain drainage calculations, including pervious and impervious areas (inclusive of roof areas), runoff coefficients, volume of runoff, storage volume, and overflow pipe sizing. The plans also include details of the proposed stormwater structures, a structure schedule with the type and size of structures, elevations, invert elevations, and volume (when applicable).

Comment 9-35: DEIS p. 9-14 (New York State Pollutant Discharge Elimination System (SPDES) Program) Nassau County DPW requests that a copy of the SWPPP be provided when available. (Curran_2564)

Response 9-35: Phase I of the SWPPP has been prepared and a copy was provided to NCDPW.

Comment 9-36: In addition to the above items, as part of the Stormwater Management Design for the redevelopment, Nassau County would request the following: (1) The design engineer should provide further analysis to demonstrate that the new drainage configuration that includes Site A and
Site B would not negatively impact the existing 66-inch drain pipe and/or NC Basin 122; (2) The eastern portion of the Belmont Property is within the Elmont Drain watershed which is at or above capacity and experiences surcharging during heavy rainfall events. An evaluation should be performed to determine the feasibility of redirecting overflow from the eastern portion of the Property, particularly potential overflow from the South Lot and East Lot (above the required on-site storage), into the system that discharges into the 66-inch pipe along the Cross Island Parkway. This improvement would benefit the surrounding community of Elmont by reducing periodic flooding; and (3) Evaluate the feasibility of an additional stormwater basin built on-site to handle volume from the redeveloped site. This concept had been previously discussed and was the subject of a “Village of Floral Park Drainage Study” conducted in 2008 (D & B Engineers). The focus of the study was to alleviate flooding in the vicinity of the Clover Ave. and Mayfair Ave. within the adjacent Village of Floral Park. (Curran_2564)

Response 9-36: With respect to (1) above, the results of HydroCAD® modeling provided in Appendix D show that the proposed runoff from the overall site development has been reduced from the existing conditions runoff, and the time of concentration has not increased. As such, the Proposed Project would not adversely affect the existing 66" storm sewer in the Cross Island Parkway or the NC Stormwater Basin # 122.

With respect to (2) above, the eastern portion of the Belmont Property is outside of the Project scope and is not controlled by the Applicant. The East Lot is proposed to remain in its existing paved condition.

With respect to (3) above, this area is outside of the Project scope and is not controlled by the Applicant. As stated above (see, for example, responses to Comments 9-15 and 9-38, the improvements to the North Lot would include proposed on-site drainage to reduce the runoff from this parking area.

Comment 9-37: The DEIS falsely claims that the Bay Park Sewage Treatment Plant discharges into the ocean and is under mandatory nitrogen removal to comply with a Total Maximum Daily Load (TMDL). (Alfonsi_1044, Esposito_CCE_141)

Response 9-37: The Bay Park Sewage Treatment Plant currently discharges to Reynold’s Channel and local embayment areas that are inland of the barrier islands and not directly to the ocean. This has been modified in the text of Chapter 9, “Water Resources.” The DEIS does not refer to a TMDL for nitrogen. However, the language has been modified for the FEIS to indicate that the Bay Park Sewage Treatment Plant is in compliance with its SPDES permit.
OTHER

Comment 9-38: The Floral Park-Bellerose School District is scheduled to renovate and irrigate its athletic field this summer. It requests written assurance from ESD that any damage or water drainage which develops or occurs to the development on the project side of the fence will be rectified to the school district's satisfaction by the ESD. (Ferone_TS1_852)

Response 9-38: As detailed in Chapter 9, “Water Resources,” in order to minimize impacts on surrounding properties during construction, including the School District properties, the Proposed Project would implement a Stormwater Pollution Prevention Plan (SWPPP) that would ensure that stormwater runoff is controlled on site and that sediment does not get transported onto adjacent properties and roadways. As part of the Proposed Project, the North Lot is proposed to be resurfaced, striped, and lighted and stormwater management features, such as drywells and piping, would be installed to prevent runoff from reaching adjacent properties and roadways. In addition, the North Lot would be graded away from the neighboring properties to minimize the potential for off-site impacts.

Comment 9-39: There are existing complaints of NYRA impacts to water resources at Aqueduct Racetrack. (BPCC_132)

Response 9-39: The operations of Aqueduct Racetrack are not the subject of this EIS or the GPP.

NATURAL RESOURCES

VEGETATION AND ECOLOGICAL COMMUNITIES

Comment 10-1: The paddock and backyard are home to historic trees imported to New York more than 200 years ago and were transplanted during the reconstruction in 1956 to preserve them. What consideration is being given to protect them? (Appelbaum_NYTHA_2546)

There is no mention of the number of trees to be removed or a ratio of the number that would be replaced. There is no mention of the impact of removing mature trees with new trees, and the amount of time that it would take for new trees to mature. (VFP_2548)

DEIS states that it intends to remove 124 mature trees from Site A and 66 mature trees from Site B. ESD should plant a variety of trees and vegetation to compensate for the loss of 190 trees from the project site. Hardscaped plazas are not sufficient to mitigate the removal of these natural resources. (Culotta_2365, Culotta_2572)
DEIS p. 10-9 states, "A minimal number of trees would be removed from the North Lot, South Lot, and proposed electrical substation area." Where exactly are the trees that would be removed and do they serve as a sound barrier? (VFP_2548)

**Response 10-1:**

As detailed in Chapter 10, “Natural Resources,” at least 190 trees would be removed between Site A and Site B. While many of the trees that would be removed are mature, some of them are over-mature and in decline. They would be removed and younger trees would be planted in other areas of the Project Sites. In addition, 3.75 acres of landscaped open space would occupy Site B and 2.0 acres of hard-/soft-scaped plazas would occupy Site A. These areas would include the planting of trees, shrubs, and herbaceous species.

No trees are being removed from the paddock. The number of tree removals within the “Backyard” and throughout the Project Sites was minimized to the extent practicable. As described in Chapter 10, the Proposed Project would result in the removal of approximately 124 mature trees from Site A (a majority of which are located in the existing Backyard area) and 66 trees from Site B. Approximately 109 trees, 108 shrubs, and other vegetation would be planted on Site A. While a landscape plan for Site B has not been finalized, NYAP’s new plantings on Site B would be in excess of 66 trees (the number estimated to be removed). No trees would be removed from the East Lot. A minimal number of trees would be removed from the North Lot, South Lot, and proposed electrical substation area. A tree protection plan is being developed for the Project Sites to protect trees that would remain after construction of the Project that are in the vicinity of areas of disturbance. However, approximately 30 percent of the trees surveyed within the Project Sites were identified as undesirable species, diseased, damaged, or in decline. The average lifespan of many of the species of trees in the Project Sites is approximately 200 years; therefore any trees that may be near that age are nearing the end of their lifespan.

The few trees that would be removed from the proposed electrical substation area would be within the footprint and immediate vicinity of that proposed structure as shown on Figure 1-1. These trees are located adjacent to the Cross Island Parkway. Other trees between the North Lot and the Cross Island Parkway would remain and could serve as a barrier to sound. Few, if any, trees are likely to be removed from the North Lot. Trees within the South Lot that may be removed are in the interior or the South Lot and do not function as a sound barrier.

**Comment 10-2:**

The removal of trees and other vegetation should occur during winter months so as not to disturb local wildlife. (Culotta_2365, Culotta_2572)
Response 10-2: Timing tree and vegetation removal during the winter months would have negligible added benefit to local wildlife as most of the urban tolerant wildlife expected to occur on the Project Sites are present and active in the region year-round. These species are also disturbance tolerant and prevalent in the region and would be capable of relocating to similar suitable habitat available nearby during construction. The USFWS issued a determination of no effect (March 1, 2019) for the Proposed Project with respect to the northern long-eared bat, with the understanding that tree clearing would occur outside the winter months, and indicated that no further Endangered Species Act coordination or consultation is required for northern long-eared bats. Therefore, tree removals do not have the potential to affect northern long-eared bats.

WILDLIFE

Comment 10-3: We support the measures described to reduce the amount of reflective glass on the first two stories, to use bird-safe glass, and to locate vegetation away from reflective glass. However, we must emphasize that bird collisions occur at all levels. It is not sufficient to state “structures constructed under the Proposed Project would be well below the altitudes at which birds typically migrate (650 to 2,500 feet) and the heights of structures with which nighttime collisions of birds can sometimes occur for structures located in the Atlantic Flyway and in close proximity to migratory hotspots such as Alley Pond Park, Forest Park, Jamaica Bay Wildlife Refuge, Valley Stream State Park, and Hempstead Lake State Park. Migratory birds will be attracted by any greenery and descend to stage and forage. The project should reduce the amount of reflective glass on structures above 2 stories. (Weiner_SSAS_2097)

Response 10-3: The height of the proposed structures in relation to the typical altitudinal range of nocturnally migrating birds is relevant to and presented in the assessment to support the conclusion that nighttime collisions of birds would likely be extremely infrequent. Nighttime collisions of birds with structures are uncommon relative to daytime collisions to begin with, and this is even more so the case when a given structure is so far below the altitudes at which night-migrants typically fly. There is also no evidence that collisions commonly occur during morning descents into stopover habitats, so the proximity of the project site to the referenced parks miles away cannot be assumed to have any influence on the likelihood of collisions. Regarding daytime collisions and the stories at which they occur, research has consistently shown that the vast majority of daytime collision mortality occurs at the first, second, and sometimes third story. This includes the Loss et al. (2014) study that is referenced and misinterpreted in the comment. As stated in the comment, that study found 44 percent of collisions to occur at buildings of 3 stories or less, 56
percent at buildings of 4-11 stories in height, and <1 percent at buildings greater than 11 stories. However, the figure of 56 percent does not mean that 56 percent of collisions happened between the 4th and 11th stories of those buildings. Rather, that 56 percent cumulatively occurred anywhere between the 1st and 11th stories. It can be interpreted as an incremental figure. In other words, one could assume based on the figure from buildings 3 stories or less (44 percent) that, of the 56 percent of mortality at buildings 11 stories or less, 44 percent of that occurred at the first 3 stories and only the remaining 12 percent occurred above that. Similar studies have found collisions at houses (buildings 3 stories or less) to account for an even greater majority of collisions relative to buildings of greater height (Machtans et al. 2013 Avian Ecol. Cons.; Bayne et al. 2012 Wildl. Res.), providing further evidence that the first few stories of buildings play the most significant role in collisions while the higher stories contribute little to collision mortality. For these reasons, implementing bird-safe building design features at the first two stories of the proposed structures would have the most effect by reducing the potential for collisions where it is by far the greatest.

Comment 10-4: The project needs to mitigate the potential for bird collisions with transmission lines. (Weiner_SSAS_2097)

Response 10-4: As detailed in Chapter 3, “Community Facilities and Utilities,” underground transmission lines would extend east from the substation along Belmont Park Road for approximately 1.5 miles. The transmission lines would then transition to two riser poles on Plainfield Avenue and connect to existing overhead power lines on Plainfield Avenue. A transmission overpass would be installed to connect to the existing overhead circuit on Plainfield Avenue. Please also see the response to Comment 3-27.

Comment 10-5: The Full Environmental Assessment Form notes the presence of the following birds: Red-tailed Hawk, Turkey Vulture, Mourning Dove, Rock Pigeon, Blue Jay, American Crow, American Robin, Gray Catbird, House Sparrow, European Starling, Common Grackle, Brown-headed Cowbird, Song Sparrow, and Canada Goose. The DEIS omits the full list and needs to include it. We appreciate that the DEIS includes research into daytime and nighttime bird collisions with buildings, for residential and migratory birds. (Weiner_SSAS_2097)

Response 10-5: The species listed on the Full Environmental Assessment Form have been included in the Natural Resources assessment of the EIS and have been considered in the conclusion that the Proposed Project would not result in significant adverse impacts to wildlife.
Comment 10-6: The DEIS needs to address the issue of mitigating nighttime lighting that attracts birds. Lights divert nocturnal migrants from their original path, especially in foggy or cloudy conditions, and they will circle lighted structures, colliding with them and each other. (Weiner_SSAS_2097)

Response 10-6: Single structures with artificial lighting, such as communications towers and buildings, can create disorienting conditions for night-migrants and result in collisions mainly when that structure is in an otherwise dark landscape and stands out as the only or one of the only sources of artificial light in the area. In contrast, the Proposed Project is located within an urbanized landscape that is full of artificial light sources. Therefore, within this heavily light-polluted landscape, the Proposed Project does not have the potential to stand out as a source of lighting that on its own would attract and create the potential for collisions of migrating birds.

Comment 10-7: There is concern about potential impacts to wildlife from the proposed parking lots. (Lauria_095)

Response 10-7: As described in Chapter 10, “Natural Resources,” of the EIS, operation of the Proposed Project would not result in significant adverse impacts to wildlife. The limited habitats found within the study area support urban-adapted, generalist species. Terrestrial wildlife habitats within the study area are presently limited to mowed lawns with trees, paved road/path communities, and successional southern hardwood forest in a highly urbanized setting. The proposed parking lots would occupy approximately the same footprint as the existing park lots. In addition, landscaping (3.75 acres on Site B and approximately 2.0 acres on Site A) would provide habitat improvements for wildlife within the study area. Parking field illumination would be controlled by time clock and daylight sensors to operate from dusk to dawn. A lighting control system would provide the ability to lower light levels after events on site to limit unwanted lighting late at night, but still provide sufficient safety and security lighting. With these measures, the incremental change in lighting would not have the potential to result in significant adverse impacts to wildlife.

**THREATENED, ENDANGERED, AND SPECIAL CONCERN SPECIES AND SIGNIFICANT NATURAL COMMUNITIES**

Comment 10-8: Open issues related to tree removal and bat habitat loss remain unanswered. (EAM_2563)

Response 10-8: A determination of no effect was received from USFWS on March 1, 2019, indicating that no further Endangered Species Act (ESA) coordination or consultation is required for northern long-eared bats.

**OTHER**
Comment 10-9: Did the DEIS consider potential impacts to the horses from proposed parking near the practice track? (Wagner-Tyson_TS2_918)

Response 10-9: As detailed in Chapter 17, “Mitigation,” with the implementation of proposed mitigation measures, it has been determined that the East Lot would likely only be needed approximately 15 times a year to accommodate retail and arena parking (and potential daytime Belmont Park racing events) on certain weekend days in the midday, when parking demand would be at its maximum. A portion of the East Lot would be regularly utilized for bus parking.

It should also be noted that horses are accustomed to vehicular activity closely proximate to the Training (practice) Track. As detailed in Chapter 2, “Land Use, Zoning, and Community Character,” the interior of the Training Track currently is used for several internal operations including material screening, storage of trash, and manure waste transfer; these uses operate from 11 a.m. until approximately 9 p.m. seven days a week. The interior of the training track is also utilized by car dealerships and the Department of Motor Vehicle (DMV) which conducts tractor-trailer training at the site.

With respect to coordination of training activities and operations between NYRA and NYAP, please see the responses to Comments 15-23 and 15-24.

TRANSPORTATION

TRAVEL DEMAND ANALYSIS

Comment 11-1: To expect a majority of event attendees to take public transportation is a reflection of the ignorance of our community culture. People on Long Island drive. (Milazzo_2203)

Response 11-1: The DEIS did not assume that a majority of arena patrons would use public transportation to travel to the arena. As shown in Chapter 11, “Transportation,” Table 11-1, driving is expected to be the primary travel mode for arena patrons, with 86 and 91 percent of arena patrons arriving by auto or taxi for weekday and Saturday hockey games, respectively. Public transportation services, including the LIRR and transit buses, are estimated to be used by 14 and 9 percent of arena patrons arriving for weekday and Saturday hockey games, respectively.

Following publication of the DEIS, the LIRR developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via stations along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches). This is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and
thus minimize the potential for traffic diversions onto local streets. This condition has been analyzed in Chapter 17, “Mitigation,” of the FEIS. Chapter 17 also includes a comprehensive Transportation Management Plan (TMP) that includes demand management strategies to shift demand from auto to alternate modes of transportation. Driving by auto is still estimated to be the primary mode for arena patrons, with 51 and 61 percent of arena patrons arriving by auto or taxi for weekday and Saturday hockey games, respectively.

**Comment 11-2:** The LIRR assumption for train passengers was greater than the actual train passengers during the Belmont Stakes. The analysis of the LIRR use is based on an overestimation of the number of people that will utilize the train. (EAM_2563)

**Response 11-2:** The commenter’s assertion is incorrect. As shown on Table 11-16 of the EIS, the LIRR has annually carried from 9,725 to 35,920 passengers to the racetrack on Belmont Stakes day from 2008 through 2017 with a corresponding mode share ranging from 17 to 35 percent of attendees using the LIRR. Table 11-1 of the EIS shows that 12 and 7 percent of arena patrons are estimated to use the LIRR for weekday and Saturday hockey games, respectively, and Table 11-36 of the EIS shows that the maximum number of arena patrons using the train would be at a weeknight concert, when there would be a total of 2,280 LIRR riders. Both the projected LIRR mode share and LIRR ridership by arena patrons for the Proposed Project are lower than the Belmont Stakes. Please also see response to Comment 11-1.

**Comment 11-3:** Page 11-4 of the DEIS states “driving by auto is expected to be the primary travel modes for arena patrons.” This contradicts the stated goal of the project to rely significantly upon mass transit like LIRR. Omitting any plausible LIRR path for the majority of Islander fans who arrive from the East while not providing a plausible mass transit path is a failure of the DEIS. (Gunther_2344)

**Response 11-3:** Following publication of the DEIS, the LIRR developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via stations along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches). This is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets, as documented in the Chapter 17, “Mitigation,” of the FEIS.

**Comment 11-4:** The travel pattern comparison of Belmont Park to the Barclays Center in Brooklyn is wholly inappropriate. The Barclays Center is located in a
Chapter 22: Response to Public Comments  

dense urban environment which is served by LIRR and nine different subway lines. More spectators to the proposed arena can be expected to come from Nassau and Suffolk counties, which has less transit availability/accessibility compared to Barclays Center. Comparison to another U.S. arena with similar public transportation options and accessibility may be more appropriate. It is difficult to believe 12 percent of people will be taking the LIRR to the arena because there will be limited LIRR service to the Belmont station. (EAM_2563)

**Response 11-4:**

The FEIS further explains the methodology used to determine modal splits for arena patrons, which is the percentage of attendees that would use each of the particular modes of transportation to travel to the Project Sites (i.e., auto, taxi, LIRR, bus). This process utilized ZIP Code data for Islanders ticket purchases at Barclays Center and the Nassau Coliseum to establish the anticipated distribution of origins of arena patrons at the Belmont Park location. It assumes that most arena patrons for an Islanders game would still come from Nassau and Suffolk Counties but there would be a slight increase in trips coming from New York City given its closer proximity to Queens and the availability of LIRR service from points west.

Mode splits were then assumed for each ZIP Code based on its location in relationship to the regional roadway and transit network and estimated travel times by driving or using public transportation. The projected modal splits for arena patrons used in the DEIS, which included 12 and 7 percent arriving by LIRR for weekday and Saturday hockey games, respectively, reflected that driving by auto would be the primary mode for most arena patrons (e.g., those coming from Nassau and Suffolk counties) but the availability of LIRR and bus service at the Belmont Park location would allow some patrons to utilize transit (e.g., those coming from New York City). The projected LIRR mode splits used in the DEIS for Belmont Park were much lower than those for Islanders games at Barclays Center, which range from approximately 25 to 45 percent based on studies provided in the LIRR 2017 Ridership Book.

Since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing Belmont Park Station on the spur and provide direct service from Nassau and Suffolk counties, as noted in the responses to Comments 11-1 and 11-3. With this new direct LIRR service for arena patrons arriving from the east and more frequent service for arena patrons arriving from the west, LIRR mode split is estimated to increase to 30 to 24 percent for weekday and Saturday hockey games, respectively. The mode split for arena patrons that would use the LIRR are still lower than those for Islanders games at Barclays Center.
Comment 11-5: The two other shopping centers that are cited, Woodbury Common Premium Outlets and Bicester Village, are both considerably farther from their respectively cited metropolitan areas (Manhattan approximately 47 miles from Woodbury Common, and London approximately 63 miles from Bicester Village) with fewer mass transit options than what the proposed retail village at Belmont would be for other parts of NYC and Nassau County. Therefore, it is speculative to conclude that private bus operators would provide service for Belmont from other parts of NYC and Nassau County to supplement public transit. Please address. Are there currently private bus operators providing similar service from Manhattan to Roosevelt Field Mall or the Americana Manhasset, both which are farther from Manhattan than Belmont? Furthermore, commercial vehicles are prohibited from traveling on the Cross Island Parkway. What routes are these anticipated private bus operators expected to use, and how does this affect the surrounding roadway network? How does this impact traffic during peak periods? (Curran_2564)

Response 11-5: Woodbury Common and Bicester Village consist of high-end outlets. The retail village would also be high-end luxury outlet shopping and is anticipated to operate similarly to Bicester Village, as it would be run by the same operator as Bicester Village.

Roosevelt Field Mall and the Americana Manhasset are not comparable examples of type and scale of shopping that would be provided at the proposed retail village. As described in Chapter 1, “Project Description,” the retail village is anticipated to host a collection of international, regional and local brands, as well as a collection of emerging, entrepreneurial and innovative brands identified within the New York metropolitan area and would be expected to draw customers from Long Island and the Greater New York City metropolitan area, as well as from the national and international tourism industry. Bicester Village is one of the top attractions in the United Kingdom for international tourists, and it is anticipated that many of the trips made to the proposed retail village would be by visitors from abroad through organized shopping excursions from Manhattan or group travel on their way to or from JFK Airport.

The travel patterns at Bicester Village and Woodbury Common Premium Outlets both have a similar pattern of temporal distribution of arrivals and departures, with trips peaking during the midday period on weekdays and weekends, and average shopping durations of up to four hours, whereas a shopping center like Roosevelt Field Mall has trips peaking during both the midday and evening periods with shorter average shopping durations of up to 2.5 hours. For these reasons, it is anticipated that the proposed
retail village would attract organized tour groups and bus trips from Manhattan for shoppers making day trips.

Bus trips would be expected to mostly occur outside of EIS analysis peak hours and would be expected to travel along Hempstead Avenue/Hempstead Turnpike to access the Project Sites.

Comment 11-6: The use of 11,700 patrons attending the arena as a design criterion is too low and does not represent a “conservative analysis” the report states was used. Tables 11-1, 11-4, and 11-5 of the DEIS do not match up. The use of 11,700 for arena patrons represents 65 percent capacity for hockey games. Why wasn’t the full capacity of a hockey game used for a conservative analysis? The DEIS fails to account for traffic generated from the maximum capacity of the proposed arena.

For hockey, shouldn’t 14,940 arena patrons traveling by auto be used for the weekday pre-event period and 15,840 arena patrons traveling by auto be used for the Saturday pre-event and post-event periods? Utilizing an Average Vehicle Occupancy (AVO) of 2.75 results in 5,433 vehicle trips arriving for the weekday pre-event period, not the 3,531 that was used. Similarly, utilizing an AVO of 3.0 results in 5,280 vehicle trips arriving in the Saturday pre-event period and departing in the Saturday post-event period, not the 3,432 and 3,960 that were used, respectively. (Curran_2564)

Response 11-6: The EIS analyzed weeknight and Saturday night sold-out hockey games with 18,000 attendees and consistently did not account for the presence of empty seats due to no-shows. Overall, the conditions identified in the analysis of peak hours that include trips by arena patrons for sold-out events are expected to occur at only limited instances over the course of the year, and non-sell-out conditions during most days with arena events would experience fewer trips.

The 11,700 inbound person trips for arena patrons during the weekday pre-event and Saturday pre-event time periods shown in Table 11-4 of the EIS represent the number of trips projected to arrive during the peak hour; it was assumed that 65 percent of arena patrons would arrive in the hour preceding the start of the game based on a review of arrival patterns for attendees at other arenas, including Nassau Coliseum. Similarly, the 13,500 outbound person trips for arena patrons during the Saturday post-event time period shown in Table 11-4 of the EIS represent the number of trips projected to depart during the peak hour; it was also assumed that 75 percent of arena patrons would depart in the hour following the end of a game. The vehicle trips shown in Table 11-5 of the EIS also reflect these temporal distributions, with 65 percent of arena patrons arriving during the pre-event peak time period (with the remainder arriving before or after
that peak period) and 75 percent of arena patrons departing during the post-event peak time period (with the remainder departing before or after that peak time period).

Comment 11-7: The average vehicle occupancies (AVOs) are unsupportable, except for the “Disney on Ice” shows, which are family oriented. AVOs of 2.75 and 3.00 persons per vehicle were assumed for weekday and Saturday hockey games, respectively, and 3.90 for Disney on Ice shows. An analysis of how they determined the AVOs for each event should have been included. We believe an AVO of 2.50-2.75 should have been used for the hockey games to be more conservative in the analysis. A parking lot survey at Nassau Coliseum could have been included or other studies that were performed at Nassau Coliseum could have been included to reflect more accurate numbers. (EAM_2563)

Response 11-7: As described on page 11-4 of the EIS, the AVOs used in the analysis were based on a review of other sporting venues within the United States, including the Barclays Center. The results of travel surveys conducted at the Barclays Center in 2013 showed AVOs of 2.75 for weekday basketball games, 3.22 for Saturday basketball games, 2.95 for weekday concerts, 3.15 for Saturday concerts, and 4.17 for Saturday Disney on Ice shows. The 2009 *The Lighthouse at Long Island FGEIS* included parking occupancy counts during Islanders games at the Nassau Coliseum, which showed parking generation rates of 0.27 to 0.29 cars per seat (which would translate to AVOs of more than 3 if all attendees drove) but these could not be used because they did not include surveys of vehicle occupancies or modal splits. The 2009 *The Lighthouse at Long Island FGEIS* also included vehicle occupancy surveys for a weeknight Long Island Ducks baseball game in Central Islip, which showed an AVO of 2.85. The data shown in these surveys are in line with the assumptions used in the EIS.

Comment 11-8: The Trip Generation Handbooks used in the study are out of date. The 9th Edition of the Trip Generation Handbook should have been used. The study used the 2nd and 3rd Editions. (EAM_2563, Schneider_TS1_849)

Response 11-8: The *Institute of Transportation Engineers (ITE) Trip Generation Manual* and *ITE Trip Generation Handbook* are two separate reference documents. The latest editions of the *ITE Trip Generation Manual* (the 10th Edition) and the *ITE Trip Generation Handbook* (the 3rd Edition) were used in the preparation of the EIS. Furthermore, for the non-arena uses’ Saturday internal capture trip assumptions that were not available in the 3rd Edition of the *ITE Trip Generation Handbook*, the 2nd Edition of the *ITE Trip Generation Handbook* was used to develop the assumptions.
Comment 11-9: The retail in Site A is comprised primarily of restaurants. The ITE land use category for restaurants should have been used for trip generation instead of a shopping center. (EAM_2563, Schneider_TS1_849)

Response 11-9: As analyzed in the EIS, the proposed 435,000 gross square feet (gsf) of retail space would include primarily retail uses with some supporting dining and entertainment uses. The trip generation for this use was based on ITE Land Use 820, which includes retail stores and other non-merchandising facilities such as restaurants; the trip generation was only split into Site A and Site B for purposes of determining the linked trips by arena patrons. Furthermore, Site A would also consist of other uses such as “experiential” retail beyond just the food and beverage uses. Therefore, shopping center travel demand assumptions were collectively used for the entire collection of retail. As discussed in Chapter 1, “Project Description,” since publication of the DEIS, the Applicant has reduced the size of the retail component by 85,000 gsf, but the FEIS conservatively retains the analyses that were presented in the DEIS of up to 350,000 gsf of retail.

Comment 11-10: The weekday 34 percent pass-by traffic used for the proposed retail for the weekday PM peak hour used is too high. The ITE Trip Generation Handbook (9th Edition), the industry standard, shows weekday pass-by traffic of 28 percent. (EAM_2563, Schneider_TS1_849)

Response 11-10: The 34 percent pass-by trip percentage for Land Use 820 – Shopping Center is from the ITE Trip Generation Handbook, 3rd Edition, which accompanies the ITE Trip Generation Manual, 10th Edition. These were the latest industry standard references during the preparation of the EIS. Please also see response to Comment 11-8.

Comment 11-11: Why were the internal capture credit percentages discussed on DEIS Pages 11-6 and 11-7 utilized for the arena patron’s component of generated traffic in Table 11-5? Please explain the logic behind removing trips from both the Retail and Arena Components for internal capture credits. (Curran_2564)

Response 11-11: The internal trip capture credits presented in Table 11-5 of the EIS are shown for both retail and arena patrons to differentiate between the different types of internal capture trips that would occur on the Project Sites. The internal capture trips listed under the retail, hotel, and office uses, which are based on guidance from the ITE Trip Generation Handbook, represent trips between these uses and are listed under these uses. The internal capture trips between the retail uses and the arena patrons, which are primarily based on professional judgement and weekday assumptions from the 2015 Nassau Events Center (NEC) Project EAF and further adjusted for the Saturday conditions, represent
trips between the retail uses and arena patrons and are listed under the arena patrons. A footnote has been added to Table 11-5 of the FEIS to provide further clarification.

Comment 11-12: Why was “subway” listed as a mode of transportation to arrive/depart as there is no existing MTA subway in the vicinity of the arena? The closest subway line is the F train at Hillside Avenue & 179th Street, approximately 4 miles away. Are the transit credits applied to the traffic analysis too generous, as subway access is in fact not available. (Curran_2564, EAM_2563)

Response 11-12: The subway modal splits for arena employees in Table 11-2 and non-arena land uses in Table 11-3 were assumed to transfer to/from buses in Jamaica. A footnote has been added to these tables in the FEIS for clarification. As noted in Chapter 11 of the EIS, these transfers to and from buses were included in the calculation of project-generated bus trips.

Comment 11-13: The distribution percentages appear to be based on the assumption that census tract data will provide an accurate indication of how the trips should be distributed, however, those trips were calculated using the 2000 census rather than the 2010 census. (EAM_2563)

Response 11-13: The trip distribution percentages for non-arena uses were based on the most recent available data from the U.S. Census, which included American Community Survey 2012-2016 Five-Year estimates of population data and 2006-2010 Reverse Journey-to-Work (RJTW) data for commuters traveling to workplaces in the study area. RJTW data from the 2000 U.S. Census were only used for modal splits and vehicle occupancy rates for construction workers because this type of data for workers in the construction and excavation industry is not available in more recent data sets.

Comment 11-14: Reverse Journey to Work (RJTW) is not appropriate source of modal split, vehicle occupancy and assignment patterns for proposed retail, hotel, and community facility. RJTW is used only for office/workers. (NYCDOT_2562)

Response 11-14: Given the location of the project site, the level of transit usage for the proposed retail, hotel, and community facility uses is anticipated to be similar to RJTW data for existing workers in the study area. As presented in Table 11-2 of the EIS, the overall transit share is approximately 16 percent based on the RJTW data for existing workers while the predominant mode share is auto at 80 percent. Furthermore, as described in Chapter 11, it is anticipated that the proposed retail village would be served by private bus transit services. Therefore, given the location of the project site and the very high auto share described above, the modal split
and vehicle occupancy were also conservatively assumed for the retail, hotel, and community facility uses. As described in Chapter 11, the traffic assignment patterns for the proposed retail, hotel, and community facility uses were not based on RJTW data and were instead based on population data from the U.S. Census and other assumptions based on professional judgement.

Comment 11-15: Please provide assignment maps for project-generated trips by mode and land use and back-up/explanation of how the percentage of trips assigned to study area portals was derived. (NYCDOT_2562)

Response 11-15: The requested backup data has been provided to NYCDOT.

Comment 11-16: The DEIS projects that 89 percent of arena patrons traveling by car will utilize the Cross Island Parkway and that only 7 percent of arena patrons will travel west utilizing Hempstead Turnpike. (Culotta_2365)

Response 11-16: As noted in the response to Comment 11-4, ZIP Code data for Islanders ticket purchases at the Barclays Center and Nassau Coliseum were used to establish the anticipated distribution of origins of arena patrons at the Project Sites, and modal splits were then assumed for each ZIP Code based on its location in relationship to the regional roadway and transit network and estimated travel times by driving or using public transportation. For each ZIP Code, traffic was assigned to the roadway network following the most direct route to the Project Sites using routing information from Google Maps and professional judgement.

Comment 11-17: What percentage of ZIP Code origin for New York Islander ticket sales data originate from Elmont, Valley Stream, North Valley Stream, South Valley Stream, Malverne, Lynbrook, Hewlett, Woodmere, Cedarhurst, Inwood, Atlantic Beach, Long Beach, East Rockaway, Island Park, Oceanside, and Rockville Centre? These are the most likely origins of travelers who would presumably use roadways other than the Southern State and Cross Island Parkways as their route to the proposed arena. Traffic analysis should be revised to account for alternative routing. The “most direct route” does not take into account for potentially significant travel delays on the parkway system and anticipated detours onto local roads due to travel delays. (Curran_2564)

Response 11-17: Collectively, the 16 communities listed in southwestern Nassau County by the commenter represent approximately five percent of the total projected arena patrons traveling by auto to a hockey game at the arena. It is likely that very few of these arena patrons would use local streets to access the arena. As nearly all of these communities are located south of the Southern State Parkway and Belt Parkway, it is anticipated that the majority of these vehicles would use one of these parkways to then travel...
north on the Cross Island Parkway and access the Project Sites. The Proposed Project would be served by three interchanges on the Cross Island Parkway (Exit 26A, Exit 26B/C, and Exit 26D), two of which provide direct access to the parking facilities.

Comment 11-18: Please provide justification for the pass by trip generation credit being utilized. As per the 2014 CEQR Technical Manual “up to 25 percent of linked and/or pass-by trip credit for retail developments is allowed, unless valid information based on an original survey support a higher linked and/or pass-by trip credit”. Additionally, please confirm that the pass-by credit is applied to auto trips only. Furthermore, the pass-by credit shown in “Proposed Project—Vehicle Trip Generation Summary” (Table 11-5) doesn’t reflect the percentage of pass-by credit described on Page 11-7. Please clarify the discrepancy. (NYCDOT_2562)

Response 11-18: The project is located outside of New York City limits. Therefore, the pass-by trip percentages from the ITE Trip Generation Handbook, 3rd Edition, were used for this project located in Nassau County. The pass-by credit was only applied to the auto trips. Furthermore, the pass-by trip percentage was applied to the net external auto trips (auto trips – internal capture trip credit). For example, during the weekday pre-event (7 PM to 8 PM) peak hour inbound, the “Retail – Site B” pass-by trip credit of -44 was calculated by applying the weekday PM peak hour 34 percent (described on page 11-7) pass-by credit to (132 – 3 = 129), which results in the -44 inbound pass-by trip credit shown in Table 11-5 of the EIS.

Comment 11-19: NYCDOT has concerns with the use of ITE trip generation rates which result in lower trip generation rates than what is considered for NYC. The National Cooperative Highway Research Program (NCHRP) 684 Report methodology is cited as a source for internal capture trips during the weekday peak hours, however the report states the report should not yet be considered an ITE–approved methodology, and the ITE Trip Generation Handbook, 2nd and 3rd Editions is cited as a source for Saturday internal capture trips, which is not typically used in NYC. Furthermore, it is not clear why arena patrons are assumed to have internal capture trips when this would be considered the primary trip. Therefore, we recommend the monitoring plan should also include trip generation, origin/destination, internal capture trip and pass-by trip rates, and mode choice survey to determine whether the trip generation is accurate, as well as non-event days. (NYCDOT_2562)

Response 11-19: This project is located outside of New York City limits, and ITE trip generation rates are typically used for projects in Nassau County. Regarding the NCHRP 684 Report methodology, this methodology has been adopted by ITE. Chapter 6, “Trip Generation for Mixed-Use
Chapter 22: Response to Public Comments

The recommended methodology is the same recommended procedure presented in NCHRP Report 684: Enhancing Internal Trip Capture Estimation for Mixed-Use Developments. The internal trip capture credits presented in Table 11-5 of the EIS were shown for both retail and arena patrons to differentiate between the different types of internal capture trips that would occur on the Project Sites. The internal capture trips listed under the retail, hotel, and office uses, which are based on guidance from the ITE Trip Generation Handbook, represent trips between these uses and are listed under these uses. The internal capture trips between the retail uses and the arena patrons, which are primarily based on professional judgement and weekday assumptions from the 2015 Nassau Events Center (NEC) Project EAF and further adjusted for the Saturday conditions, represent trips between the retail uses and arena patrons and are listed under the arena patrons. A footnote has been added to Table 11-5 to provide further clarification.

The TMP, a draft copy of which is included in Appendix J of the FEIS, includes a monitoring plan that would be used to obtain the type of information cited. The components of the monitoring plan have been preliminarily discussed with NYCDOT and would continue to be discussed in detail with NYCDOT as a stakeholder.

Comment 11-20: The trip generation uses unrealistic “internal capture” and “pass by” credits. The non-ITE sources are not included in the report and were prepared by the same firms who prepared the Belmont DEIS. (EAM_2563)

Response 11-20: The internal trip capture assumptions for the retail, hotel, and office uses are based on guidance from the ITE Trip Generation Handbook, 2nd and 3rd Editions. The internal trip capture assumption between the retail uses and the arena patrons are primarily based on professional judgment and weekday assumptions from the 2015 Nassau Events Center (NEC) Project EAF and further adjusted for the Saturday conditions. The pass-by trip percentage assumptions for Land Use 820 – Shopping Center is from the ITE Trip Generation Handbook, 3rd Edition.

Comment 11-21: Please provide travel demand assumption tables for each proposed land use that include temporal and direction splits during the peak hours analyzed. (NYCDOT_2562)

Response 11-21: The requested backup data has been provided to NYCDOT.

Comment 11-22: Please provide the basis of the modal split by region/county provided for weeknight Islanders game. Also, please provide similar tables for
Saturday arena events (Disney on Ice and Islanders game) and back up for those modal split assumptions. In addition, please explain how the Disney on Ice origin/destination was determined. (NYCDOT_2562)

Response 11-22: The basis for the weighted average modal splits by region/county for a weeknight Islanders game was included in the additional traffic backup provided to NYCDOT. The same origin-destination data was used for weekday and Saturday arena events, and the modal splits for Saturday events were adjusted to reflect a reduction in transit usage compared to weeknight events.

Comment 11-23: Please explain how the number of taxi trips were determined. (NYCDOT_2562)

Response 11-23: Projections of taxi usage were developed based on a review of modal split data at other event venues, considering the location of the Project Sites and anticipated usage by transportation network companies such as Uber and Lyft. It is anticipated that arena patrons using rideshare services would do so when economically practicable, to avoid drinking and driving, or both.

Comment 11-24: Please provide The Lighthouse at Long Island Final Generic EIS (FGEIS) which is referenced as a source for the number of arena employees. (NYCDOT_2562)

Response 11-24: The requested backup data has been provided to NYCDOT.

Comment 11-25: Please provide the sources for the land uses provided in the parking accumulation tables, as well as the temporal and directional distributions. (NYCDOT_2562)

Response 11-25: The requested backup data has been provided to NYCDOT.

Comment 11-26: Please include a freight trip generation analysis for the Proposed Project. NYCDOT advocates for freight demand management practices (e.g., delivery consolidation and off-hour deliveries). Please look to incorporate these practices into the proposed project plan. (NYCDOT_2562)

Response 11-26: While a freight trip generation analysis is typically not included as part of an EIS, the Applicant has incorporated freight demand management practices into the Operations Plan of the draft TMP included in Appendix J of the FEIS. Active management of Proposed Project operations would limit truck and delivery traffic to non-peak travel periods and during arena events. To the fullest extent possible, truck arrivals and departures would avoid peak commuting hours from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays.
Chapter 22: Response to Public Comments

Comment 11-27: For the DEIS, Stantec apparently used actual traffic patterns and impacts experienced at Value Retail's Bicester Village in England. Since NYAP and its experts made reference to and relied upon actual traffic data from Bicester Village, I demand that the back-up information be made available to the public to see what has actually taken place at Bicester Village. This should include information on mitigation measures which will be undertaken before new events take place there.

Request that NYAP be required by the State to disclose its own studies and traffic and significant impacts that the Value Retail locations have already experienced, including all studies, local municipalities, etc. be made part of a new more detailed DEIS. The DEIS must include experience from Value Retail’s other projects, including the number of visitors, traveling patterns, as well as the parking, transportation, and other environmental impacts that Value Retail sites have on their hosting communities. (McEnery_2337, McEnery_2340, McEnery_2358)

Response 11-27: Traffic counts from Bicester Village were only used in the EIS to establish the temporal distribution of trips to and from the retail village as it is the most comparable facility for the type of high-end luxury outlet retail anticipated at the Project Sites. These temporal distributions were confirmed based on a review of arrivals, departures, and shopping durations as Woodbury Common, which is the most comparable type of comparable high-end outlet retail in the surrounding area. Please also see response to Comment 11-29. ESD, as lead agency, is required to conduct and has conducted its own independent traffic studies, which form the basis of the EIS analyses.

Comment 11-28: Here are some of the issues that Value Retail raised in Bicester, England regarding a proposal when a TK Maxx store wanted to become a neighbor of Bicester Village. Value Retail needs to address these before it's allowed to become a neighbor at Belmont Park.

1) The proposal will have a significant adverse impact on nearby areas and should therefore be refused.

2) The applicant’s approach fails to consider alternative options.

3) The applicant has failed to consider whether there are other, more accessible/better connected sites.

4) No cumulative impact assessment has been undertaken. Therefore the applicant is not credible.

5) The applicant has failed to robustly assess the traffic changes arising from the proposal.
6) The scheme is reliant upon private cars as the principle means of access to the site.

7) The level of traffic has been underestimated.

8) Insufficient evidence provided to demonstrate that the application is capable of mitigating traffic increases on the highway network. It should be demonstrated using detailed modeling.

9) Site access from the local highway would come under pressure as a consequence of the application traffic being unable to reach the development from that direction.

10) It is too close to the local primary school.

11) Given the absence of a robust traffic analysis, it cannot be taken at face value that there is sufficient parking, resulting in parking in the nearby streets.

12) Service and delivery vehicles will queue back onto the adjacent highway network.

13) There is no certainty that the local highways can accommodate the traffic arising from the proposal.

14) The applicant has failed to clearly identify capacity to support the scale of the retail proposed.

15) The applicant has failed to demonstrate it can deliver appropriate and sufficient mitigation measures to off-set the increases in vehicular trips that would arise. (McEnery_2358)

Response 11-28: ESD, as lead agency, has prepared this EIS, which has addressed all potential impacts from the Proposed Project as required by SEQRA.

Comment 11-29: Although ESD tries to compare the proposed retail village to another local retail establishment at Woodbury Commons, surprisingly, ESD uses travel patterns associated with Value Retail's Bicester Village luxury outlet center near London, United Kingdom as a baseline. Why is ESD using travel patterns in the United Kingdom as a comparison? This comparison seems bizarre. Traffic impacts should be studied based on US equivalents, studying traffic in the UK seems to not be so analogous. Also, international tourism is not part of the vision or master plans of the surrounding communities, and it would cause significant adverse impacts and disruptions to the quality of life. (Culotta_2365, Culotta_2572)

Response 11-29: Travel patterns for the retail village used in the EIS were based on several sources including the ITE Trip Generation Manual (10th Edition), U.S. Census Data, and the 2013 Willets Point Development Final Supplemental Final EIS (FSEIS) for trip generation and the U.S. Census
ACS Reverse Journey-to-Work data for Nassau County census tract 4048 for modal split and average vehicle occupancy data; Bicester Village data were only used for temporal distributions which were confirmed to be similar to Woodbury Common. Traffic impacts were analyzed solely on the basis of local study area traffic counts, methodologies, and criteria. The use of impact data and studies from Value Retail's other venues would not be applicable or appropriate in this local study area. Please also see response to Comment 11-27.

Comment 11-30: There was no truck traffic included in the analysis for the new site. Trucks on the road create more blockages, slower traffic and consequently a lower level of service on the road. (EAM_2563)

Response 11-30: The ITE Trip Generation Manual vehicle trip rates include both personal passenger vehicles and trucks. Furthermore, as described in the draft TMP included in Appendix J of the FEIS, active management of Proposed Project operations would limit truck and delivery traffic to non-peak travel periods and during arena events. To the fullest extent possible, truck arrivals and departures would avoid peak commuting hours from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays.

Comment 11-31: The DEIS claims the existing race track usage is active 89 days of the year. However, the Belmont season begins at the end of April and goes until the end of October, which is more than 89 days. The arena will be open year-round. This adversely impacts the traffic on any given day, but even more over a much greater period of time than portrayed in the study. (EAM_2563)

Response 11-31: The commenter's assertion is incorrect. Racing at Belmont Park is held during the Spring Meet (from late April through mid-July) and during the Fall Meet (from mid-September through late October). During the summer, racing shifts to Saratoga Race Course. As described in chapter 11 of the EIS, in 2017 Belmont Park had 54 race dates in the Spring Meet and 35 race dates in the Fall Meet for a total of 89 race dates.

Comment 11-32: People will use Uber to get to the Belmont Park which will create more traffic in the local community. (Culotta_TS1_890, Trainor_TS1_854)

Response 11-32: The use of Uber and Lyft is accounted for in the travel demand estimates and has been factored into the traffic analyses. Designated drop-off and pick-up locations for taxis and rideshare vehicles have been included in the proposed site plan and would be located within the Project Sites.
DETAILED ANALYSIS METHODOLOGIES

Comment 11-33: Weeknight Islanders games currently start at 7:00 PM, whereas the DEIS assumed a 7:30 PM start time. (EAM_2563, Fishinger_TS1_868, Schneider_TS1_849)

Response 11-33: As stated in Chapter 11 of the EIS, there would not be 7:00 PM hockey games on weeknights. With the opening of the proposed arena, weeknight games would start at 7:30 PM rather than at 7:00 PM, except for some nationally televised games which could start at 8:00 PM. This would help in delaying pregame arrivals further away from the background commuter peak traffic hour. Saturday evening games could start at 7:30 PM as well but were conservatively assumed to start at 7:00 PM to overlap with background and retail traffic. Please also see response to Comment 11-38.

Comment 11-34: The highway capacity analysis was performed by software Synchro 9 using the 2000 Highway Capacity Manual (HCM), but that HCM is an outdated version. This manual is the industry standard by which all highway analysis is done. However, calculations should be made using the 2010 HCM, the latest version, to reflect the most current standards. The DEIS traffic analysis failed to use the most recent version of Synchro to model and simulate traffic. The DEIS used Version 9 referenced in the 2010 Highway Capacity Manual. Version 10 was released before the SEQRA process for this project commenced and is designed to support the latest edition of the Highway Capacity Manual (6th Edition) for traffic assessment.

VISSIM simulation modelling was used for part of the Cross Island Parkway corridor and correlated to LOS using 2000 HCM. Why wasn’t 2010 HCM utilized? (Curran_2564, EAM_2563, Schneider_TS1_849, VFP_2547)

Response 11-34: As HCM methodology was used for level of service and delay evaluation, Synchro versions 9 and 10 would yield the same analysis results. This was confirmed by rerunning the analysis files using the Synchro 10 software. While there are more recent versions of HCM methodologies, both HCM 2010 and HCM 6th Edition have limitations regarding the types of intersections and signalization they can analyze. For instance, these newer versions of HCM do not support non-NEMA signal phasing, signal overlaps, intersections with more than four approaches, turning movements with shared and exclusive lanes, or exclusive pedestrian phases—all of which occur within the study area and the greater New York City area in general. Due in part to these limitations, HCM 2000 methodology is still the accepted methodology employed by NYCDOT.
For these reasons, HCM 2000 methodology was selected to analyze all study area intersections, which span across different jurisdictions, to maintain consistent analysis findings and allow for a fair comparison of intersection service conditions throughout the study area and among different geographic areas. For the analysis of the segments of the Cross Island Parkway adjacent to the Project Sites, the VISSIM results were post-processed and translated into Level of Service (LOS) using the LOS criteria in the HCM 2000. The HCM 2000 has similar LOS thresholds as the HCM 2010, except that in the HCM 2010 the definition of LOS F for freeway weaving segments changed from “greater than 43 passenger cars per mile per lane” to “demand exceeds capacity.”

Comment 11-35:

The peak arena event—a sold-out concert with 19,000 people—was not analyzed for traffic impacts. This would be extremely important to analyze because concerts represent a typical use of the arena that would have very large traffic impacts, worse than a hockey game, and the question to whether or not the roads can handle this traffic remains unanswered.

The DEIS should be revised to utilize the 30th highest attended event days for the arena for its design criteria. It is safe to assume that given the 50 marquee event and 44 to 60 New York Islanders home games that at least 30 of the events at the arena will be sold out to maximum capacity; therefore the full 19,000 patrons attending the arena should be used.

It would be reasonable to consider that concert events at the arena, which would have the highest capacity and attendance, would still draw a large portion of its attendees to the facility during an overlap with the weekday PM Peak period of 6:30-7:30 PM and the Saturday PM peak period from 6:00-7:00 PM, as attendees would arrive to the facility early to utilize dining facilities within the retail areas before the concert. This point is further supported by the Traffic Management Plan strategy to encourage patrons to arrive early or stay later. Therefore, the maximum capacity of 19,000 arena attendees should be used in traffic generation analysis to provide the most conservative analysis possible for the weekday PM and Saturday PM and night periods. (Curran_2564, EAM_2563 Schneider_TS1_849)

Response 11-35:

As described in Chapter 11, “Transportation,” hockey games were selected as the representative worst-case analysis scenario for traffic conditions because compared to concerts they are expected to have an earlier start time (with a larger overlap with the background evening commuter peak period) and more concentrated temporal distribution (i.e., a higher percentage of area patrons would arrive during the hour before the event’s start time). Most concerts typically begin at 8:00 PM and the arrivals of attendees is more spread out because there are usually opening
acts before the headliner band and a significant number of attendees typically arrive after the concert begins. For a hockey game, it was assumed that 25 percent of arena patrons would arrive between 1-2 hours prior to the start of the game, 65 percent of arena patrons would arrive in the hour prior to the start of the game, and 10 percent of arena patrons would arrive in the hour after the start of the game. For a concert, it was assumed that 25 percent of arena patrons would arrive between 1-2 hours prior to the start of the concert, 45 percent of arena patrons would arrive in the hour prior to the start of the concert, and 30 percent would arrive in the hour after the start of the concert. Therefore, in the hour prior to the start of an event, a hockey game would generate a total of 11,700 peak hour person trips (18,000 * 65%) whereas a concert would only generate a total of 8,550 peak hour person trips (19,000 * 45%).

Comment 11-36: Why is it not proposed to restrict night racing during other arena events such as concerts which have higher attendance than hockey games and other large to medium events? Were any analyses performed supporting this agreement only for hockey games?

How will this agreement be enforced? It can only be determined whether or not aggregate attendance exceeds capacity at the time of the event; not everybody buys their tickets online and there will always be last-minute buyers/attendees. (EAM_2563, NYCDOT_2562)

Response 11-36: As described in Chapter 11, “Transportation”: “If night racing is approved, NYAP and NYRA have agreed that night racing and non-hockey arena events could be scheduled on the same evening as long as the aggregate attendance for both events does not exceed the maximum attendance level for a sold-out hockey game (18,000 seats).” This would also preclude other events, such as concerts, if the aggregate attendance for night racing and the arena event is more than 18,000.

As described in Chapter 1, “Project Description,” in addition to hosting Islanders games and concerts, the arena would host large to medium events (utilizing between 6,000 and 11,500 seats) and small or non-ticketed events (utilizing 3,500 seats or fewer). If night racing is approved, attendance levels experienced at Belmont Park Racetrack during night racing would be used to identify the types of arena events that could be held without exceeding the maximum attendance level. This requirement would be a condition of the MEC as well as NYAP’s lease agreement.

Comment 11-37: Please explain how the peak hours were selected for analysis, as well as detail how an 18,000 seat hockey game considered a worst case analysis over a 19,000 seat concert. As per the 2014 CEQR Technical Manual traffic analysis considers the peak activity hours for the proposed project,
the peak hours for background traffic already existing in the study area, and which combinations of the two may generate significant impacts. (NYCDOT_2562)

Response 11-37:

As described in Chapter 11, “Transportation,” hockey games were selected as the representative worst-case analysis scenario for traffic conditions. Compared to concerts, hockey games are expected to have an earlier start time (with a larger overlap with the background evening commuter peak period) and more concentrated temporal distribution (i.e., a higher percentage of area patrons would arrive during the hour before the event’s start time). Table 22-2 below provides a comparison of trip generation for a sold-out hockey game (18,000 attendees) starting at 7:30 PM on a weekday, a sold-out concert (19,000 attendees) starting at 8:00 PM on a weekday, and existing background traffic volumes on the Cross Island Parkway and Hempstead Avenue/Turnpike, which shows that the combination of background traffic volumes and project-generated traffic would result in the highest overall traffic volumes during the 6:30 PM to 7:30 PM during a hockey game.

<table>
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<th>Time Period</th>
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<th>Existing Traffic Volumes</th>
<th>Total Traffic Volumes</th>
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<td>8:00 PM Concert</td>
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</tbody>
</table>

Note: (1) Project-generated vehicle trips include trips for non-arena uses and do not account for internal capture or pass-by trips.

Comment 11-38:

The DEIS analyzed the evening commuter peak hour from 7 to 8 PM, not the traditional 5-6 PM and is therefore deficient.

The weekday PM peak hour for purposes of the DEIS analysis is 6:30 PM to 7:30 PM, and is based on the assumption that weekday Islanders games
at the arena will begin at 7:30 PM. A footnote to this section of the DEIS (See, Footnote 5, at p. 11-7) asserts that some nationally televised weekday games could start at 8:00 PM, but the 7:30 start time was conservatively assumed since the earlier start time would produce an overlap with higher volumes of background and retail traffic. The footnote also states that there would not be 7:00 PM hockey games on weekdays. The DEIS projects that 65 percent of arena patrons will arrive in the hour preceding the start of a game, with 25 percent arriving more than one hour before the start of a game, and 10 percent being late arrivals.

A review of the Islanders remaining schedule for the 2019 regular season (i.e., February and March) indicates that all weekday home games are scheduled to start at 7:00 PM. This start time is consistent with other local NHL franchises, as the vast majority of both the NY Rangers and the NJ Devils remaining 2019 weekday home games also begin at 7:00 PM. Absent confirmed, written agreements from the NHL, the Islanders, and their radio and television broadcast partners that there will be no 7:00 PM weekday home games, it is not appropriate for the DEIS to assume regular 7:30 PM or 8:00 PM start times. To provide an accurate assessment of weekday peak hour traffic demand, the weekday peak hour for analysis should be 6:00 PM – 7:00 PM. Further, because the local highway network is already overburdened during the typical weekday evening commute period, the DEIS should also analyze the impacts of the projected 25 percent of patrons expected to arrive during the 5:00 PM – 6:00 PM weekday peak commuting time period. (Fishinger_TS1_868, VFP_2547)

Response 11-38: With respect to NHL start times at the proposed arena, the NHL has confirmed weekday games would begin at 7:30 PM (see Appendix F). Therefore, as described in Chapter 11, the EIS analyzed the weekday 6:30 PM to 7:30 PM time period (reflecting the hour before a game starting at 7:30 PM) and used a side-by-side comparison of existing traffic volumes on the local street and highway networks near the Project Sites and the total trip generation for the Proposed Project to determine the peak traffic analysis hours. As shown in Table 22-2, the 6:30 to 7:30 PM peak hour was selected because the combination of existing background traffic volumes and project-generated traffic volumes would be highest during this time period. SEQRA does not require an analysis of a condition that would result in lesser impacts than the reasonable worst-case scenario. Please also see responses to Comments 11-33 and 11-37.

Comment 11-39: ESD studies traffic impacts during the AM and PM peak hours, but it does not analyze traffic impacts during later nighttime hours on weekdays following events. ESD should conduct a later nighttime traffic analysis
for weekdays and allow the public to review it and comment upon it. (Culotta_2365, Culotta_2572)

**Response 11-39:**

Weeknight post-event departure conditions are not nearly as critical as pre-event arrival conditions in considering potential traffic impacts on the street and highway network since auto traffic would be contained within the various project parking lots awaiting opportunities to exit onto primarily the Cross Island Parkway rather than, during pre-event arrival periods, queuing on the Parkway while awaiting entry to project parking lots.

As described in Chapter 11, “Transportation,” a Saturday night peak hour that include arena patrons departing from a 7:00 PM hockey game was selected in lieu of a weeknight peak hour to provide for a more conservative analysis of the departures of arena patrons following a hockey game since a review of existing traffic volume data indicated that background traffic volumes on area roadways are higher on Saturday nights compared to weeknights.

**Comment 11-40:**

A comprehensive traffic study should be done to analyze the impacts on the CIP and other area roadways that were not included in the DEIS. This study should also consider attendance at Belmont Park for Belmont Stakes (and when there is a Triple Crown). (Form Letter 2, Form Letter 4, Form Letter 8)

**Response 11-40:**

The Belmont Stakes represents the single worst-case day of the year with attendance levels often three times the size, or more, than a sellout event at the arena which makes it an atypical condition for SEQRA analysis purposes. Furthermore, there would be no event held at the arena concurrent with the Belmont Stakes and activity at the retail village would likely be sharply reduced as any parking provided on the Project Sites would be made available for use by NYRA in connection of the running of the Belmont Stakes—therefore, project-generated traffic, and potential impacts, would not be at maximum levels as they would be on non-Stakes days.

**Comment 11-41:**

ESD analyzes a number of locations for its traffic analysis, but it does not consider drivers who will drive north on Plainfield Avenue then west on Jericho Turnpike to enter the Cross Island Parkway following arena events. ESD should consider this traffic pattern and associated impacts, particularly with potential congestion at the Cross Island Parkway exit at Belmont Park on game days. (Culotta_2572, Culotta_2365)

**Response 11-41:**

This would be a very illogical routing from the North Lot or Site B, which are both served by interchanges of the Cross Island Parkway and would not require vehicles to use local streets following an event. The proposed
route would also be significantly out of the way for vehicles exiting the South and East Lots. As discussed in Chapter 11, “Transportation,” the Plainfield Avenue entrance (Gate 8) would be closed and not accessible for vehicular access to the Proposed Project.

Comment 11-42: I also urge ESD to conduct a traffic study that analyzes the potential impacts of the entire Cross Island Parkway corridor, given the potential for event patrons to enter the parkway through a wide variety of intersections, especially if they are using apps like Google Maps and Waze to find the fastest routes to and from the arena. ESD’s traffic study of the Cross Island Parkway only examines a limited segment of it. (Culotta_2572)

Response 11-42: The Cross Island Parkway was analyzed using a VISSIM micro-simulation model for an approximately four-mile long segment that extends beyond the limits of the Project Sites, from the Linden Boulevard interchange (Exit 25B) to the Jamaica Avenue interchange (Exit 27). The model also includes the three interchanges that would provide access and egress to the Proposed projects (Exit 26A, Exit 26B/C, and Exit 26D. Please also see responses to Comments 11-44 and 11-212.

Comment 11-43: In past years, residents have felt the drastic increases of traffic congestion and public transportation wait times due to the Belmont Stakes. While traffic demand analyses have been initiated, it is critical that they sufficiently measure changes to transportation peak hours in Nassau County, increases to the amount of vehicles traversing the area, and parking. As the amount of commuters rises, the burden on the Cross Island Parkway does as well. (Solages_2402)

Response 11-43: As part of the comprehensive TMP that would be a key part of mitigation designed to reduce auto trips to the Proposed Project and promote use of public transportation, a monitoring plan would be implemented to measure the volume of traffic generated by the Proposed Project, changes in traffic volumes on key roadways and sensitive local residential streets on event and non-event days, parking accumulation studies, observations of the effectiveness of neighborhood parking restrictions and other key measures of effectiveness. A draft copy of the TMP is provided in Appendix J of the FEIS.

Comment 11-44: For a project this size, some sort of traffic demand model is needed to project how much traffic will be using local streets. (Fishinger_TS1_868)

Response 11-44: Between preparation of the DEIS and the completion of this FEIS, a major emphasis of the traffic studies has been on limiting auto diversions off of the Cross Island Parkway (CIP) onto local streets, especially residential streets. A comprehensive TMP was developed in detail and is
incorporated within Chapter 17, “Mitigation,” of the FEIS. One specific proactive measure is to partner with Waze to label local streets such as Plainfield Avenue—which has been cited by the public as a readily available “opportunity” for traffic diversions—as “unavailable” for those who seek alternative routes to the Project other than the CIP. It does not mean that Plainfield Avenue is in actuality unavailable; just that when motorists search for route alternatives, Plainfield Avenue would not be shown as an option during event periods. Please refer to Chapter 17 and Appendix J of the FEIS for the full TMP.

Comment 11-45: Suggests the project team come to the area on Belmont Stakes Day to measure traffic. We can't live with that level of traffic every day. Concerned that a suggestion by LIRR to conduct a traffic study during Belmont Stakes Day was not implemented. (Lee_TS1_878, Licari_TS1_883)

Response 11-45: The Belmont Stakes is a unique event that occurs once a year. It is not an appropriate day to conduct traffic counts and analyses for use as baseline conditions for the Proposed Project or for any other related matter. The Belmont Stakes typically attracts up to 90,000 attendees, which is between four and five times the maximum attendance of a sold-out event at the proposed arena, which would be 18,000 for a hockey game or 19,000 for a concert. The other uses envisioned as part of the Project would attract additional patrons but over the course of a full day.

Comment 11-46: The DEIS on page 11-42 states that since other proposed developments in the area are expected to generate relatively new traffic, the traffic demand for these other sites was assumed to be reflected as a part of general background growth. This is not the standard method for determining future traffic without the proposed site in place. The study should have determined the generated trips for each newly other proposed development and then added that traffic to the surrounding roadway system in addition to applying a background growth rate. (EAM_2563)

Response 11-46: As stated in Chapter 11, “Transportation,” of the EIS, projected future traffic volumes without the Proposed Project were developed by applying an annual growth rate to the existing volumes and adding traffic estimated to be generated by significant development projects near the traffic study area. The three No Action development projects that were added on top of the background growth rate are listed in Table 11-21.

Comment 11-47: Concerned regarding the lack of any substantive traffic study for the Cambria Heights area.

The impact of the redevelopment on Cambria Heights was not included as part of the discussions/studies. The transportation studies focused on
traffic flow to the redevelopment from east and north not west and south of the location. Therefore, I am requesting that transportation and environmental studies be conducted to include reports on the impact the redevelopment has on Cambria Heights which is southwest of the redevelopment location. (Block_CHCA_106, Block_CHCA_133, Block_TS4_972, English-Young_1052)

Response 11-47: The traffic study area selected for the Proposed Project includes the major intersections and roadways in the vicinity of the Project Sites which could potentially experience adverse impacts due to the Project-generated traffic. The Proposed Project would not generate a substantial amount of traffic from Cambria Heights or other areas such as Laurelton or St. Albans that would travel through Cambria Heights to reach the Project Sites. Therefore, Cambria Heights would not be utilized by a substantial number of project-generated trips and therefore has not been included in the traffic study area.

Comment 11-48: Disappointed initial traffic study did not include Bellerose, Cambria Heights, Queens Village and any Queens communities. (Comrie_TS4_968)

Response 11-48: The traffic study area selected for the Proposed Project includes the major intersections and roadways in the vicinity of the Project Sites which could potentially experience adverse impacts due to the Project-generated traffic. The EIS traffic study area included eight intersections in Queens Village at locations along Hempstead Avenue and Jamaica Avenue. Only a limited number of trips would be expected to travel through the neighborhoods of Bellerose and Cambria Heights. Please also see the response to Comments 11-47 and 11-51.

Comment 11-49: The traffic study only used a half-mile radius which is unreasonable when the surrounding community has already dealt with multiple accidents including deaths and injuries to young people. You decided to just do an EIS on just 0.5 miles that is one half of a mile. That is truly a slap in the face for all communities within a 10 miles radius of this project.

It is dire that the safety studies initiated increase the radius of the areas studied to properly ascertain the influx of drivers and the ancillary effects of the project.

The traffic study that was done was not large enough. Only 6 were done in Queens. Six intersections is insufficient to gauge the impact of this project on Queens neighborhoods, they are also largely under the jurisdiction of NYCDOT, not the state. (Moriarty_2144, Solages_2402, Solages_TS1_855, Stringer_144)
Response 11-49: The traffic study area and identification of the intersections to be analyzed were based on the most logical routes to and from the Project Sites and the locations with the greatest potential for incurring significant adverse traffic impacts. It was not based on a predetermined radius such as a half-mile (in fact, some of the analysis locations extend over two miles away from the Project Sites) nor on how many should be analyzed in Queens or Nassau Counties. The analyses conducted in the EIS concluded that there would be unmitigated traffic impacts along the Cross Island Parkway during all analysis time periods, and significant adverse traffic impacts at a select number of local street intersections that would be mitigated, except for two locations in Queens (the intersection of Hempstead Avenue and Springfield Boulevard and the intersection of Hempstead Avenue and 225th Street) that would have impacts that could not be mitigated.

Comment 11-50: The County finds that the anticipated traffic impacts generated by the proposed action are not completely identified and analyzed in the DEIS. County-owned and maintained roadways, such as Dutch Broadway, Elmont Road, Plainfield Avenue and Tulip Avenue (not an exhaustive list), all surround the Belmont Property and will likely serve as alternative access routes to the Property from State highways such as the Cross Island Parkway, Southern State Parkway and Jericho Turnpike. It is critical that the analysis be revised to identify all potential impacts to the operation and safety of aforementioned County roadways and feasible mitigation be proposed. Why were all Local, County, and State roads & intersections to the south and east omitted from the analysis? (Curran_2564)

Response 11-50: The traffic study area included intersections to the east of the Project Sites along the Hempstead Turnpike and Jericho Turnpike corridors, both of which are primary east-west arterials and are expected to be utilized by vehicles primarily traveling from the communities of Franklin Square, Garden City, Hempstead, Mineola, New Hyde Park, and West Hempstead. As discussed in the response to Comment 11-17, vehicles traveling from communities located to the south of the Project Sites would be expected to use the Southern State Parkway and the Cross Island Parkway to access the Project Sites.

Comment 11-51: Intersections in the Bellerose area that will be impacted by increased traffic were not included in the DEIS. Traffic will be diverted to local roads such as Commonwealth Boulevard, 249th Street, Little Neck Parkway, and 266th Street/Plainfield Avenue to avoid the CIP. Comptroller Stringer and Councilman Grodenchik have requested that NYCDOT conduct a study of potential impacts on roads in Bellerose,
Queens Village, and Cambria Heights. The results of this study must be considered when completed. (Hellenbrecht_BCCA_052)

**Response 11-51:** Access to the Project Sites is provided via three interchanges on the Cross Island Parkway (Exit 26A, Exit 26B/C, Exit 26D), two of which provide direct access to parking facilities. Access from local streets through the Bellerose area to on-site parking, however, would be circuitous and not desirable to motorists. ESD has consulted extensively with NYCDOT, which has reviewed the traffic study and draft TMP of which it has been included as a stakeholder.

**Comment 11-52:** The traffic estimates do not take the expansions of JFK and LaGuardia airports into consideration. (Lee_TS1_878)

**Response 11-52:** The EIS analyzed future year conditions for the year 2021, and traffic growth projections were developed by applying an annual background growth rate (to account for general historical growth in traffic and smaller projects that would generate a modest amount of traffic) to the existing volumes and adding the traffic estimated to be generated by significant development projects in the area that are anticipated to be completed by 2021.

**Comment 11-53:** NYCDOT should review the DEIS’s assumptions regarding peak trip times, modal share between mass transit and vehicular usage, and analyzed intersections to provide an independent review of ESD’s methodologies. If any discrepancies are found between NYCDOT’s standards and those used by the ESDC, it is imperative that the City issue comments on the DEIS before the State makes their final decision. (Stringer_144)

**Response 11-53:** ESD has met with representatives of NYCDOT to respond to their questions and to resolve any of their issues; see correspondence found in Appendix M.

**TRAFFIC CONDITIONS**

**Comment 11-54:** The arena will cause too much traffic leading to congestion on the CIP, Hempstead Turnpike, Jericho Turnpike, and residential streets.

An arena is going to be the biggest cause of traffic problems.

The arena would cause way too much traffic and there is no full time LIRR stop. (Brown_TS4_974, Doyle_1055, Laguerre_105, Morgan_2351)

**Response 11-54:** The EIS confirms that the arena would be the largest traffic-generating component of the Proposed Project, and identifies potentially significant traffic impacts on the Cross Island Parkway and the other arterials and
residential streets in the area. However, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches), which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR's Rockville Centre Station, the Downtown Jamaica area, and park-and-ride facilities as well as charter bus service would result in a major reduction in vehicular traffic volumes as compared to what was projected in the DEIS. Please refer to Chapter 17 for additional information and Appendix J for a draft copy of the TMP.

Comment 11-55:

Traffic is already bumper-to-bumper.
Concerned that existing traffic volumes on the CIP, Hempstead, and Jericho Turnpikes are already too high.
Traffic is already at a standstill during the afternoon and evening rush.
Plainfield Avenue is already congested in the evening rush.
There is already congestion with school pick up and drop offs.

(Alexander_TS1_887, Alfonsi_TS4_1030, Amato_TS1_846, Chatterton_TS2_903, Colgan_2542, Ferone_TS2_926, Fishbein_TS2_920, Form Letter 5, Gross_TS1_858, King_TS2_914, Nicolello_TS2_925, Paoli_TS3_950, Peterson_139, Rakowski_TS2_909, Riebe_2075, Smith_2570, Wagner-Tyson_TS1_863)

Response 11-55:

The EIS has completed in-depth analyses of traffic conditions along the Cross Island Parkway, Hempstead Turnpike/Hempstead Avenue, and Jericho Turnpike and at key local intersections throughout the study in light of the fact that the Proposed Project would be a generator of substantial additional traffic. The EIS concluded that there would be significant traffic impacts along the Cross Island Parkway corridor that could not be mitigated via physical infrastructure improvements since such improvements were not practicable, but that local street network impacts could largely be mitigated except for two locations in Queens (the intersection of Hempstead Avenue and Springfield Boulevard and the intersection of Hempstead Avenue and 225th Street) that would have impacts that could not be mitigated. As mitigation, a comprehensive TMP would reduce vehicular traffic and further mitigate projected impacts.

Comment 11-56:

Please take careful thought on how this area will be impacted with rush hour traffic prior to expected game start times between 7:00 PM and 8:00
PM. Many commuters will be utilizing this vital access way other than getting to a sports arena. (Bayat_2105)

Response 11-56: Given this concern, the Applicant requested and received confirmation from the NHL that weekday hockey game start times would be moved to 7:30 PM in order to reduce the overlap of project-generated traffic with the background rush-hour traffic.

Comment 11-57: We have narrow Hempstead Turnpike and residential homes and tons of traffic at all hours of the day and night. (Amato_2362)

Response 11-57: Existing and projected future traffic conditions—with and without mitigation measures—are fully documented in the EIS.

Comment 11-58: Hempstead Turnpike cannot handle current traffic volumes and increases to that from the arena will be a mess. (Milazzo_2203, Morgo_2241, Morgo_2327)

Response 11-58: The traffic analysis analyzed a total of 17 intersections along Hempstead Turnpike and identified significant impacts at a total of 3 intersections during one or more analyzed peak hours.

A series of intersection-specific mitigation measures have been developed for key Hempstead Turnpike locations that would otherwise be significantly impacted by the Project. The construction of a new Elmont Station on the LIRR Main Line that would directly serve customers/attendees on the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches, provision of shuttle buses to/from the Rockville Centre Station on the Babylon branch of the LIRR, and a comprehensive TMP aimed at reducing peak hour traffic.

Comment 11-59: This development will be a tremendous mistake, since the highways and roads to and from this venue will in no way be sufficient to accommodate the resulting traffic. Anyone familiar with the Cross Island Expressway knows that the traffic on this highway is often at a standstill and that the construction of a 19,000-seat arena, a shopping mall and a hotel will certainly exacerbate the problem.

Four thousand cars clogging up the Cross Island Parkway and Hempstead Turnpike going to and from a brightly-lighted sports arena that sports fans with big bucks to spend on entertainment sports will have in addition to the one some seven miles down the turnpike and more local traffic on back roads trying to avoid the major artery. Congestion isn’t what we need.

With the addition of an arena the specific events will impact primarily the transportation infrastructure. There is one main thoroughfare serving passenger traffic, which is the Cross Island Parkway. Already
overburdened by north/south bound traffic especially during rush hours the increase will cause major delays prompting motorists to elect local streets which clearly cannot support the normally heavy traffic they experience during key times of the day. (Lopez_2557, McGeever_2555, Sferlazza_2263)

Response 11-59: As noted in the response to Comment 11-54, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties and would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP would result in a major reduction in vehicular traffic volumes as compared as compared to what was projected in the DEIS. Please refer to Chapter 17 for additional information and Appendix J for a draft copy of the TMP.

Comment 11-60: The DEIS clearly states there will be adverse traffic effects. I can only imagine that it's on the low end of how much more congested it will actually be. (Horn_TS4_982)

Response 11-60: Under SEQRA, the EIS is charged with analyzing “reasonable worst-case conditions”. The Belmont Park Redevelopment Project EIS’ traffic analyses conservatively assumed sellout hockey game conditions with all 18,000 seats filled without any “no shows” even though Islander and industry data show that 5 to 8 percent of ticket purchasers do not end up attending even “sellout” games. Therefore, the pregame arrival peak hours and postgame departure peak hours should not be considered the “lower end” of how congested the roadways may be.

Comment 11-61: Concern about the traffic situation that will occur on the Cross Island Parkway due to construction and ultimately events. Traffic is already problematic on the CIP. The CIP is currently well past its design capacity and is consistently congested most of the day, particularly southbound during evening rush. Traffic will increase on the CIP with JFK expansion project. The addition of thousands of cars heading to the proposed arena in the evening rush would jam traffic on the CIP and spill onto local roads. The mall and hotel would extend traffic congestion throughout the day. The absence of real mass transit alternatives will result in significant traffic generation.

Concerned the Cross Island Parkway will be congested beyond already high levels due to development.

The Cross Island Parkway is at capacity, this project will create a traffic nightmare.
The project will lead to congestion on the Cross Island Parkway as well as secondary roads.

Concerned that the DEIS states that 90 percent of traffic will arrive via the Cross Island Parkway which does not have capacity to handle that additional traffic.

This project will have a mega impact on the highway.

The Cross Island Parkway in the evening and night hours cannot and would not handle the increase in traffic coming its way as it's usually filled to capacity in the first place, especially in the p.m. commuting hours. (Bazakos_041, Braun_2348, Brown_TS4_974, Carlapasso_TS3_940, Colgan_2542, Hellenbrecht_BCCA_052, Hellenbrecht_TS4_996, Hellenbrecht_TS4_996, MacDonald_2095, Maguire_1041, McHale_126, Moy_148, O'Grady_TS1_879, Palamar_2240, Peterson_139, Smith_2570)

Response 11-61: As noted in the responses to Comment 11-54, between publication of the DEIS and the completion of this FEIS, ESD has recognized that the focus of mitigation efforts must be on maximizing access to the Project Sites—and most notably to the arena—via public transportation—and reducing the volume of vehicular traffic on the Cross Island Parkway because it is not practicable to increase Parkway capacity. Therefore, in coordination with ESD and the Applicant, LIRR has developed plans for a new, full-time Elmont Station on the Main Line, and ESD and NYAP have committed to a comprehensive TMP, the projected effects of which are detailed in Chapter 17 and Appendix J.

Comment 11-62: ESD's travel study of the CIP notes that it operates up to 5,500 vehicles per hour at certain times during the week. ESD notes that, at times, vehicles travel at 5 miles per hour at Level of Service E or F given the traffic congestion during peak hours, particularly the peak PM hour when arena patrons will be traveling to New York Islanders games, concerts, or other events. ESD projects that 89 percent of the arena patrons for these events will be utilizing the CIP. Given the existing congestion and existing traffic constraints, how will the highway network absorb thousands of additional vehicles during peak travel times, such as the peak PM hour? The CIP will become even more of a parking lot as a result of this project. I strongly urge ESD to scale back the scope of this project. (Culotta_2365)

Response 11-62: As noted in the response to Comment 11-61, between publication of the DEIS and the completion of this FEIS, the emphasis of the technical studies has been on reducing the traffic demands on the Cross Island Parkway since it is not practicable to sufficiently increase its capacity. As described in Chapter 17, with implementation of the new, full-time LIRR
Elmont Station, along with the demand management strategies contained in the TMP to reduce the number of peak hour vehicle trips generated by the Proposed Project, the amount of “unserved” vehicles (unmet demand) on the Cross Island Parkway that could not be processed during the weekday PM and Saturday PM peak hours that was projected in the DEIS would be eliminated or substantially reduced.

Comment 11-63: The Cross Island Pkwy can't even handle weekday rush hour traffic now and adding 10,000 cars for an arena event hundreds of times a year will be insane.

ESD projects that up to 2,000 cars during peak hour will utilize the Cross Island Parkway. Later in the DEIS, ESD notes that over 7,500 vehicles will utilize the parking lots on the project site. These numbers do not highlight the intensity of the adverse traffic impacts, in other words, up to 2,000 cars per hour may be utilizing the Cross Island Parkway for several hours straight. The highway infrastructure will not be able to sustain the intensity of that adverse impact. (Culotta_2365, Culotta_2572, Morgo_2241, Morgo_2327)

Response 11-63: As shown in Table 11-5 of the EIS, during the weekday pre-event peak hour vehicle trips by arena patrons would generate 3,628 “ins” and 128 “outs”, the latter of which primarily involve taxis or rideshare vehicles leaving after dropping off passengers, for a total of 3,756 vehicle trips during the weekday 6:30 PM to 7:30 PM peak hour, not “10,000” cars during rush hour traffic as described by the commenter. Furthermore, the EIS’ projection of 3,726 peak hour vehicle trips is for a sold-out hockey game and does not account for the presence of empty seats due to no-shows. This condition would not occur hundreds of times per year, as claimed by the commenter. As described in Chapter 11, sold-out events are expected to occur at only limited instances over the course of the year, and non-sell-out conditions during most days with arena events would experience fewer trips. The EIS notes that the Cross Island Parkway would be substantially utilized for peak sold-out event conditions and that the Proposed Project’s parking facilities would, at their peak accumulation, contain approximately 7,500 parked vehicles, which can all be accommodated on-site.

Comment 11-64: While the DEIS states that most traffic would enter the site via the CIP, it does not account for the fact that commercial traffic cannot use the CIP. The DEIS dismisses the impact of increased commercial traffic through neighboring communities. Large trucks and buses will likely take the LIE and then approach the site through local roads, particularly down Plainfield Avenue to Hempstead Turnpike. This poses a significant risk.
to school children, increased risk of accidents, and increased risk to first responders.

The CIP does not support, actually prohibits, commercial traffic, making commercial vehicles serving the Arena reliable on the local streets.

The surrounding communities will have to be burdened by the increased commercial traffic and judging from my viewpoint that infrastructure will not support or maybe even fail to serve the Shopping Mall.

There is concern that the anticipated increases in traffic volumes on local roadways is flawed because it does not take into account that buses and trucks cannot use the CIP. (Cheng_TS1_881, Form Letter 4, McGeever_2555, Mesnick_2237, OHagan_053)

Response 11-64: The EIS recognizes that commercial vehicles are not permitted on the Cross Island Parkway. As described in Chapter 11, trucks and buses would travel to and from the Project Sites via Hempstead Turnpike or Hempstead Avenue.

Comment 11-65: The fact is this project will place a heavy burden on these otherwise predominantly suburban communities and will wreak havoc on their local traffic as well as the general environment, including increased air pollution and disposable waste. (McGeever_2555)

Response 11-65: As noted in Chapter 11 of the EIS, close to 90 percent of the project-generated traffic would use the Cross Island Parkway, not local streets. The EIS did not identify air quality or disposable waste as significant adverse impacts. See Chapter 3, “Community Facilities and Utilities,” for a discussion of solid waste management and Chapter 12, “Air Quality,” for a discussion of Project effects on air pollutant increases.

Comment 11-66: Concerns about increased traffic and congestion, and insists that every measure be taken to minimize the negative impacts to the community and environment during and after construction. (Barley_045)

Response 11-66: Comment noted.

Comment 11-67: Concerned that roads cannot handle expected traffic volumes.

Our local roads, highways and infrastructure will definitely not be able to handle the volume of vehicles and visitors that the project hopes to attract.

Concerned that scope of project will lead to unbearable traffic.

Concerns about increased congestion and the ability of roadways in general to accommodate additional traffic generated by the project.

The roads surrounding Belmont Race Track were not designed to handle the current load of rush hour traffic so how could they absorb the
Response 11-67: The EIS identifies locations where significant adverse traffic impacts would be created by the Proposed Project under reasonable worst-case conditions—with projected sold-out hockey games at the arena—along the local street network and the highway network. These are detailed within Chapter 11. Chapter 17 and Appendix J detail a substantial program of new improvements to reduce vehicular traffic was developed by ESD and the Applicant and reviewed by LIRR, the New York City Department of Transportation (NYCDOT), the New York State Department of Transportation (NYSDOT), and the Nassau County Department of Public Works (NCDPW) during the period between publication of the DEIS and the completion of this FEIS (see Appendix M).

Comment 11-68: Concerns about project impacts on traffic, safety, police, etc. (Talty_TS2_929)

Response 11-68: With respect to concerns about impacts of the Proposed Project on traffic, please see the response to Comment 11-67. With respect to Project impacts on safety and police, please see the responses to Comments 3-7 and 3-13.

Comment 11-69: Traffic would increase exponentially for Floral Park as well as adjacent towns. Shopping on Tulip Avenue or Covert Avenue would become a “nightmare”. (Lyons_FL5_038)

Response 11-69: As noted in the EIS, close to 90 percent of project-generated traffic would use the Cross Island Parkway and use Parkway exits in order to directly access parking facilities at the Project Sites. Local traffic in Floral Park and adjacent Towns is not estimated to increase substantially.

Comment 11-70: The DEIS on page 2-36 states “Although increased pedestrian and vehicular activity due to increased activity can have adverse community character effects, with the Proposed Project such effects are not predicted to occur on residential streets within neighborhoods, and generally would be limited to periods before and after major arena events.” How do you draw this conclusion when all secondary roads sure to be used are one lane each way (Plainfield Avenue, Tulip, Covert, New Hyde Park Road,
Carnation Avenue, Elmont Road). And Plainfield Avenue just north of Hempstead Turnpike doesn't even have a shoulder so if a car is stalled, traffic stops. (Alfonsi_2400)

**Response 11-70:** All of the analyses contained within the EIS are based on traffic counts and intersection level of service analyses—including number of travel lanes, lane widths, and signal timings—during the five peak traffic hours analyzed, using standard traffic capacity analysis procedures.

**Comment 11-71:** Most people will get frustrated with the traffic and stop coming to the property. (Moriarty_TS4_1004)

**Response 11-71:** Comment noted

**Comment 11-72:** NYCDOT should do a study of potential impacts and consider mitigation. (Stringer_144)

**Response 11-72:** ESD has consulted extensively with NYCDOT, which has reviewed the traffic study and draft TMP of which it has been included as a stakeholder.

**Comment 11-73:** Concerned about the increased traffic and the lack of infrastructure to support the project. (Fattorini_136)

**Response 11-73:** As noted in the response to Comment 11-54, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line. ESD, NYAP and their consultants have developed a comprehensive TMP to increase the use of public transportation and reduce reliance on auto use. This is detailed in Chapter 17, “Mitigation,” and Appendix J.

**Comment 11-74:** Against this project due to the traffic congestion it will bring. (Peterson_140)

**Response 11-74:** Comment noted

**Comment 11-75:** Concerned that many days of the year will be as disruptive as the Belmont Stakes in terms of traffic and safety concerns. On Belmont Stakes Day, traffic is terrible in Floral Park. (Cheng_TS1_881, Gonzalez_TS1_847)

**Response 11-75:** Belmont Stakes day generates attendance levels anywhere from 50,000 to 90,000, which is at least three times or more the number of attendees as would go to a sold-out hockey game at the proposed arena. Please also see response to Comments 11-40 and 1-58.

**Comment 11-76:** Traffic will be greater from arena events, but this is not a daily occurrence.
New York already has some of the worst traffic in the world and the arena would not cause that much of a difference in traffic to cause a problem. The Cross Island Parkway and Belt Parkway are already jam packed as is and with most games being played at night or on weekend afternoons, the traffic would not cause the big issue that everyone is raising.

I do worry about traffic around the arena, but I have no concerns about it. If it adds another 10-15 minutes to my commute, it’s not the end of the world. The thinking that the project’s traffic would create bottleneck like Belmont Stakes Day is false. (Eberhardt_2088, Fernandes_2556, Lehman_2364)

**Response 11-76:** Comments noted.

**Comment 11-77:**

Many of the surrounding streets need to be converted to one way. They are currently too small to accommodate the current flow of traffic. Once these developments begin, the side streets will become death traps. (Dasrath_MTA_2196)

**Response 11-77:**

The side streets near the Project Sites are not expected to receive significant levels of project-generated traffic. The TMP prepared for the Proposed Project includes a monitoring plan so, should it happen that project-generated traffic does begin to infringe on local residential streets, this would be detected, and corrective measures would be implemented.

**Comment 11-78:**

Given that riders traveling from eastern Long Island will not be able to stop at the Belmont Park station, there is a strong likelihood that, in lieu of transferring at Jamaica Station, riders will utilize other LIRR stops in the area on game days such as Floral Park or Bellerose. ESD has not considered or studied the impacts associated with this inevitable activity. These LIRR riders may also decide to complete their trips to Belmont Park using taxis, Ubers, and Lyfts, causing a demand for endless taxi lineups at these stations. These additional vehicles would add to the congestion in the local villages and increase the intensity and significance of the adverse traffic impacts. I strongly urge ESD to consider these potential significant adverse impacts and to mitigate or eliminate them through a SDEIS. (Chu_093, Culotta_2365)

**Response 11-78:**

As noted in the response to Comment 11-54, between publication of the DEIS and completion of the FEIS, the LIRR has developed plans for a new, full-time Elmont Station on its Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR's Rockville Centre Station, would result in a major
reduction of vehicular traffic volumes as compared to what was projected in the DEIS. Because of this, there is no reason to expect that any significant number of LIRR riders would complete their trips to Belmont Park using taxis, Ubers, and Lyfts from any other LIRR station causing queuing and congestion there.

**Comment 11-79:** Suggest the team visit the village to look at the traffic between 4:30 PM and 6:30 PM to see existing gridlock.

Look at congestion on Tulip and Plainfield Avenues in later afternoons. There are already sizable trucks in the area. (Palamar_2240, Pfeiffer_TS2_899)

**Response 11-79:** Traffic conditions throughout the study area, including the intersection of Tulip Avenue and Plainfield Avenue, were observed during the period when traffic counts were conducted, and the analyses in the EIS reflect the data and observations amassed in the field and analyzed via Synchro software.

**Comment 11-80:** The traffic impact of this project would severely alter the living conditions and quality of life in Floral Park and surrounding neighborhoods.

Concerned about quality of life in Floral Park due to traffic, noise, and air pollution. (Brown_TS2_928, Greene_TS2_924, Juliano_TS2_915, McLoughlin_102, Ragusa_2069, Rakowski_TS2_909)

**Response 11-80:** The EIS did not identify any unmitigated significant adverse impacts to traffic in Floral Park and surrounding neighborhoods. Potential impacts from noise and air pollution have been analyzed in Chapters 12 and 13 of the EIS, and none were identified.

**Comment 11-81:** Concerned that no improvements are planned for Hempstead Turnpike or the Cross Island Parkway. These roads need to be improved. To have any chance of making your plan get near to making sense is if you build a second level on the Cross Island Parkway and eight lanes on Hempstead Turnpike leading to it. (Burgess_2310, Gunther_TS3_938, Jacob_TS3_954, Longobardi_TS1_856)

**Response 11-81:** Traffic engineering improvements, including geometric improvements, the installation of one new traffic signal, and signal timing modifications at several other intersections are proposed for Hempstead Turnpike. The focus for the Cross Island Parkway is on a major reduction of traffic during peak pre-event and post-event traffic periods since infrastructure improvements—such as building a second level on the Cross Island Parkway and eight lanes on Hempstead Turnpike—are not cost-effective or practicable.
Chapter 22: Response to Public Comments

Comment 11-82: Concerned about the volume of traffic and impacts to local roads, including safety
Concerned that local roads cannot handle increased traffic volumes and that intersections will be gridlocked at rush hours.

Floral Park is built as a residential neighborhood. The roads are not built for heavy traffic.

The project will create too much traffic to the area of Floral Park and Elmont.

Your group has not taken into consideration the impact that traffic will have in the surrounding residential streets. (Anskat_2397, Culotta_TS3_963, Gribbins_2070, Hayden_TS2_930, Heeb_TS4_1017, JB_2553, Juliano_TS2_915, Martinez_TS2_896, Mulhall_TS1_866, O'Grady_TS1_879, Petrosino_2066, Sarro_TS1_888, Sullivan_2359)

Response 11-82: The EIS comprehensively evaluated 38 intersections during five traffic peak hours, including many local street intersections, and identified that with the detailed mitigation plan outlined in the FEIS, including a new LIRR Elmont Station that would provide direct service to the arena plus a comprehensive TMP aimed at reducing auto traffic during peak hours, plus traditional traffic engineering improvements, significant adverse traffic impacts would occur at only 11 intersections during the one or more analyzed peak hours, of which all could be fully mitigated except for two locations.

Comment 11-83: Another comparison we know all too well are the likely consequences of the Belmont Park Development Plan to communities in Queens and Nassau Counties: traffic strangulation. (MacDonald_2354)

Response 11-83: See response to Comment 11-67.

Comment 11-84: Cars coming from north of Hempstead Turnpike going to the arena or the shopping mall will attempt to use these same roads which are currently heavily utilized. (Gribbins_2070)

Response 11-84: Traffic originating from north of Hempstead Turnpike is expected to primarily use the southbound Cross Island Parkway and only secondarily use westbound Jericho Turnpike. The EIS identified potential significant traffic impacts on both routes, including southwest-bound Plainfield Avenue and westbound Hempstead Turnpike as connecting routes to the arena and retail village. The EIS includes mitigation measures for the identified impacts.

Comment 11-85: The mega project would destroy our neighborhoods and cause far-reaching traffic congestion including the Cross Island, Belt and Southern
Response 11-85: Please see the responses to Comments 11-55, 11-59, and 11-61.

Comment 11-86: The surrounding communities will be forced to deal with any negative impact such as traffic, noise, and overall impact on the environment. (Solages_TS1_855)

Response 11-86: With regard to potential impacts from traffic, please see the response to Comment 11-67. Potential impacts to community character have been analyzed in Chapter 2 of this EIS, and none were found. Potential impacts from noise have been analyzed in Chapter 13 of the EIS, and none were identified.

Comment 11-87: Concerns about increased traffic expressed by Floral Park as well as along Hempstead Turnpike have been ignored. (Corrigan_054)

Response 11-87: The EIS addresses 17 intersections along Hempstead Turnpike and 8 intersections along Plainfield Avenue (including 2 critical intersections at Hempstead Turnpike/Plainfield Avenue and Jericho Turnpike/Plainfield Avenue) as identified during the Scoping process with the local community and public agencies.

Comment 11-88: The proposal will devastate the town of Floral Park in terms traffic congestion.

It will be challenging to get around the Village of Floral Park safely with increased car and truck traffic because traffic is so bad already.

The project will change everyday life in Floral Park due to traffic and parking.

Traffic will potentially cripple Floral Park during primary business hours and during events may close us down altogether.

There is limited access in and out of Floral Park and traffic issues already exist.

Concerned about the traffic flow on Plainfield Avenue.

With both the church and the school located on Plainfield Avenue, we are concerned about the anticipated significant increase in traffic and congestion threatening the safety of our parishioners and students as a result of the Belmont Park Redevelopment Civic and Land Use Improvement Project. Since only passenger cars are permitted to use the Cross Island Parkway, the Long Island Expressway will become a main highway used by trucks to deliver goods to Belmont. Plainfield Avenue...
Chapter 22: Response to Public Comments

is one of the most direct ways for trucks to get to Belmont from the Long Island Expressway.

I live on Hemlock Street which runs parallel to Plainfield so I will be completely affected by the increased traffic. (Braun_2348, Burgess_2310, Chakery_2260, Form Letter 5, Fusco_OLV_2399, Jacob_TS3_954, Liebmann_149, Lyons_FL5_038, Mannie_2543, McLoughlin_102, Weickert_TS2_900)

Response 11-88: A focus of the traffic analyses of the local street network in the EIS has been on key intersections along Plainfield Avenue since Plainfield Avenue is the one roadway in Floral Park that could potentially be used as a route to the Project Sites. Eight intersections were analyzed along Plainfield Avenue between, and including, Jericho Turnpike and Hempstead Turnpike. The detailed level of service analyses showed that one intersection (Plainfield Avenue at Tulip Avenue) would be significantly impacted in the weekday AM peak hour and could be fully mitigated, and that one other intersection (Plainfield Avenue/Emerson Avenue at Jericho Turnpike) would be significantly impacted in the weekday AM peak hour and Saturday Midday peak hour and could also be fully mitigated. Furthermore, with the implementation of the TMP as part of the Proposed Project’s mitigation plan, and its monitoring plan, a key action item would be ensuring that sensitive residential streets in Floral Park are not significantly encumbered by other traffic. Hemlock Street is a one-block long street that is not expected to be affected by project-generated traffic.

Comment 11-89: ESD’s projected traffic estimates on Plainfield Avenue seem extraordinarily low. Where is the data to support the conclusions in the DEIS? I strongly urge ESD to disclose that information to the public in a Supplemental DEIS.

With ESD’s proposed project, the between 200 and 650 vehicles per hour that travel along Plainfield Avenue at various times throughout the week would double or triple, causing significant traffic congestion, noise impacts, air quality impacts, and safety and security impacts along this quiet residential neighborhood. Plainfield Avenue also is a two-lane road with no on-street parking and no shoulder, and these factors will add to the congestion and intensity of adverse impacts. (Braun_2348, Culotta_2365, Fusco_OLV_2399, McLoughlin_102)

Response 11-89: The project-generated vehicle trips that were assigned to use Plainfield Avenue would be expected to come from the local area and the towns located to the east along Jericho Turnpike (such as New Hyde Park, Garden City Park, and Mineola) and would not double or triple existing traffic volumes along Plainfield, as is implied by the commenter. As
described in Chapter 11, the trip origins of arena patrons were based on the estimated geographic distribution of arena patrons using ZIP Codes of Islanders ticket sales and the trip origins for non-arena uses were based on U.S. Census data and professional judgement. Trips were assigned to travel to and from the Project Sites using the most direct travel route. As the vast majority of vehicle trips that would be generated by the Proposed Project would be made by arena patrons traveling from considerable distances away in Nassau and Suffolk Counties and the Project Sites would be served by three interchanges of the Cross Island Parkway (Exit 26A, 26B/C, and 26D), the vast majority of project-generated vehicle trips would travel along the either the Long Island Expressway, Northern State Parkway, or Southern State Parkway to the Cross Island Parkway and would not travel along Plainfield Avenue. As described in the response to Comment 11-88, the EIS analyzed eight intersections along Plainfield Avenue and the two intersection that would have significant impacts would be fully mitigated.

Comment 11-90:

The mall will contribute to traffic on local streets.
The influx of people to the mall will create a traffic issue.
The mall will bring extra traffic congestion, accidents every day.
The inclusion of a “Mega” mall is certain to increase congestion in and around Belmont Park. (Carrig_TS4_987, FPBPTA_2226, Hellenbrecht_TS4_996, Pedley_TS4_993)

Response 11-90:
The projected volume of retail-generated vehicle trips is documented in Chapter 11, Table 11-5 of the EIS. The proposed retail village on Site B is not a “mega-mall” and is projected to generate the following amount of vehicular traffic as compared to the total amount of vehicular traffic generated by the full project: 515 vehicles vs. 832 vehicles in the weekday AM peak hour; 306 vehicles vs. 4,261 vehicles in the weeknight pre-game peak hour; 1,045 vehicles vs. 4,075 vehicles in the Saturday pre-event peak hour; 523 vehicles vs. 4,384 vehicles in the Saturday evening pre-game peak hour; and 240 vehicles vs. 4,496 vehicles in the Saturday night postgame peak hour. While these retail-generated volumes by themselves are significant, they represent a share of the total project-generated volumes that can be mitigated. Chapter 16, “Alternatives” of the FEIS includes a “No Retail Village Alternative.” The assessment of this alternative finds that it would not substantially avoid or reduce Project-related significant adverse traffic impacts.

Comment 11-91:

47,000 daily visitors will impact traffic and safety and is a concern to residents.
The addition of 47,000 visitors will add to the traffic volumes; disagrees that this would not influence the rate of accident occurrence, as stated in the DEIS. (McAllister_TS1_867, McGowan_TS1_864)

**Response 11-91:**

It is estimated that, on average, the Proposed Project would attract approximately 10,000 to 15,000 visitors to the Project Sites on a daily basis. Moreover, it was determined that a total attendance of 45,000 daily visitors could only occur on 10 to 15 days over the course of the year when there would be multiple arena events (e.g., a day with three sold-out Disney on Ice shows each having an attendance of 11,500). Please also see response to Comment 11-173.

**Comment 11-92:**

Concerned about accidents/violence if visitors have been celebrating too heavily and decided to drive.

Concerned that lack of public transit will mean more people driving to the area, some of whom will be drinking. This would lead to drunken driving accidents which would threaten neighborhood and children's safety. (Chu_093, Crowe_FL8_2073, Form Letter 8)

**Response 11-92:**

Drunk driving is illegal and is expected to be enforced appropriately by the local police agencies. The Proposed Project would be served by public transportation and rideshare services, including a new LIRR Elmont Station, that would provide an alternative for arena patrons from driving themselves.

**Comment 11-93:**

Excess traffic makes crashes more likely, particularly as events will include tailgating and alcohol consumption. (Culotta_2572)

**Response 11-93:**

Please see response to Comment 11-92. As noted in the response to Comment 1-88, tailgating in parking lots would be prohibited and enforced by security personnel. With respect to concerns over excess traffic, please see the response to Comment 11-54.

**Comment 11-94:**

There are so many better projects that can come here, we do not need a sports arena with drinking and driving, a hotel and another mall. (Mannie_2543)

**Response 11-94:**

As noted in the response to Comment 11-92, drunk driving is illegal and is expected to be enforced appropriately by the local police agencies.

**Comment 11-95:**

The DEIS recommends “No Build” actions including resurfacing, which has no bearing on traffic flow or capacity. This is not a mitigation measure. (EAM_2563)

**Response 11-95:**

This commenter’s assertion is incorrect. The No-Action projects described in Chapter 11 of the EIS are independent of the Proposed Actions and are not proposed as mitigation measures.
DATA COLLECTION

Comment 11-96: There was no mention of adjusting the counts taken in January and February for this study, by seasonal variation factors. The January and February counts are typically lower volume months of the year for these types of uses. (EAM_2563, Schneider_TS1_849)

Response 11-96: The traffic counts conducted in January and February 2018 were used as supplemental counts to confirm prior count data collected in October 2017. The winter count data were not used in the traffic analyses so it did not require the use of seasonal adjustment factors.

Comment 11-97: NV5 noted significant discrepancies between the traffic counts and Synchro analysis at the intersection of Plainfield Avenue and Carnation Avenue. For instance, the westbound through movement during the existing condition AM peak, was counted at 287 vehicles, but 35 vehicles were entered into the analysis. This means the DEIS omitted nearly 88 percent of the recorded data from its analysis for this intersection. (VFP_2547)

Response 11-97: The volume has been updated in the analysis and the traffic volume figures in Appendix F. This change did not affect the analysis results in any significant way.

Comment 11-98: There is a discrepancy between the automatic traffic recorder (“ATR”) and intersection turning movement count data provided for the intersection of Plainfield Avenue and Tulip Avenue compared to what was used in the traffic analysis described in the DEIS. 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. Thus, 25 percent of the recorded data was inexplicably omitted from the traffic analysis in the DEIS. The discrepancy for northbound traffic is even worse. The northbound ATR data shows an average of 426 vehicles but only 254 are used in the analysis, meaning that the analysis omitted 40 percent of the recorded data from the analysis in the DEIS. This indicates that more vehicles approach the intersection than are being processed by the signal, and the DEIS does not account for this discrepancy. (VFP_2547)

Response 11-98: The comment incorrectly compares average weekday ATR count data for the 7:00 AM to 8:00 AM or 8:00 AM to 9:00 AM time periods with the traffic volumes analyzed at this intersection during the weekday PM peak hour (6:30 PM to 7:30 PM). The existing conditions traffic analysis for the weekday AM peak hour (7:30 AM to 8:30 AM) has a volume of 507 vehicles on the westbound approach and has a volume of 407 vehicles on
Chapter 22: Response to Public Comments

the northbound approach, which are based on ATR and turning movement count data for the 7:30 AM to 8:30 AM time period.

Comment 11-99: At the Village’s direction, NV5 conducted its own field observations of key intersections in Floral Park in November 2018, including the Plainfield Avenue and Tulip Avenue intersection. The levels of service (“LOS”) in the DEIS are not consistent with NV5’s field observations. NV5 staff observed approaches to the signal routinely queueing 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 as 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 LOS being better than actual conditions, and underestimates the impact of the proposed project on this intersection. NV5’s observations have been independently verified by another consultant. 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. The Stantec analysis shows a LOS “F” service for the southbound approach to the intersection during the existing condition evening peak hour whereas the DEIS indicates a LOS “D”. The DEIS underreports existing conditions which ends up artificially understating the project’s impacts because it relies on an inaccurate base condition. Similar to the intersection of Plainfield Avenue and Tulip Avenue, the existing levels of service presented in the DEIS are not consistent with field observations conducted by NV5 in November 2018 for the intersection of Plainfield Avenue and Magnolia Avenue. 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 LOS being better than actual conditions, and underestimates the impact of the proposed project on this intersection.

Response 11-99: Field observations within the study area were conducted in October 2017 on a typical weekday from 4:00 PM to 8:00 PM. The field observations indicated southbound queueing on Plainfield Avenue from approximately 5:15 PM to 6:00 PM, after which conditions began to improve. Field observations also showed moderate congestion along Tulip and Magnolia Avenues during a typical weekday evening, with conditions improving after 7:00 PM. Overall, decreased levels of traffic congestion were observed for the analyzed weekday PM peak hour of 6:30 PM to 7:30 PM. The cited Covert Avenue Crossing Construction Detour Plan prepared by Stantec analyzed the 5:00 PM to 6:00 PM peak hour, which
is earlier than the weekday PM peak hour analyzed in the EIS (6:30 PM to 7:30 PM) and thus cannot be used as a direct comparison.

Comment 11-100: At many study locations, the analysis used a “minimum peak hour factor” of 0.80 or 0.81. The peak hour factor is a measure of how spread out traffic is across the analyzed hour. Values closer to 1.0 represent traffic that is evenly spaced throughout the hour. However, when NV5 review the traffic count data, it showed significantly lower peak hour factors, including as low as 0.58. Use of a minimum peak hour factor that is significantly higher than reflected in actual traffic count data means that the analysis artificially reduces the delays at intersections and falsely suggests that traffic at these intersections is more spread out across the hour than it actually is. Thus, the DEIS’s use of inaccurate minimum peak hour factors has resulted in an underestimation of traffic delays reported for the project. This is a significant error in the traffic analysis. (VFP_2547)

Response 11-100: The traffic analyses were calibrated using multiple factors reflecting field observations of actual traffic conditions performed by ESD’s consultants, including instances of queueing and congestion at intersections in the local street network. This calibration, which is standard practice, brought the minimum peak hour factor to 0.80.

TRAFFIC ANALYSIS – LOCAL STREET NETWORK

Comment 11-101: Some intersections are included in the Synchro file, but are not analyzed in the DEIS. At these locations, the same volumes are used for different peak hours which creates imbalances in the Synchro network. Please explain the basis of these volumes. In addition, the network should not be imbalanced. (NYCDOT_2562)

Response 11-101: The Synchro files have been updated to remove intersections that were not analyzed and located outside of the traffic study area; the traffic volumes throughout the entire networks are now balanced.

Comment 11-102: Regarding Jamaica Avenue and Springfield Boulevard: a) the Level of Service analysis (LOS) shows one left turn lane and two shared through and right turn lanes for the southbound approach, please consider one left turn, one through and one right turn lanes during all peak hours; b) the referenced phase considered in the LOS analysis is not consistent with official signal timings, please update the LOS analysis during all peak hours and scenarios; c) Street View shows parking is permitted on the east curb of the northbound approach, please explain why two shared through and right turn lanes are considered in the LOS analysis during AM peak hour. (NYCDOT_2562)

Response 11-102: The responses provided to, and accepted by, NYCDOT were as follows:
a. This lane configuration was used as a calibration measure based on observations from Miovision videos and was summarized in the Synchro calibration log included in the traffic backup provided to NYCDOT.

b. The signal timing was updated in the Synchro files.

c. This lane configuration was used as a calibration measure based on observations from Miovision videos and was summarized in the Synchro calibration log included in the traffic backup provided to NYCDOT.

Comment 11-103: Regarding Springfield Boulevard and Hempstead Avenue: a) Aerial map shows a new neckdown at the southeast corner and one left turn and two shared through and right turn lanes, please update the No-Action and Action LOS analysis during all peak hours and scenarios; b) the referenced phase considered in the LOS analysis is not consistent with official signal timings, please update the LOS analysis during all peak hours and scenarios. (NYCDOT_2562)

Response 11-103: The responses provided to, and accepted by, NYCDOT were as follows:

a. The Synchro analyses were updated to reflect this lane configuration on the northbound approach in the No Action, With Action, and Construction conditions.

b. The signal timing was updated in the Synchro files.

Comment 11-104: Regarding Jamaica Avenue and 212th Place: a) Physical inventory and aerial map shows an east crosswalk. However, the LOS analysis considered a protected southbound left turn in the LOS analysis. Please update the LOS analysis during all peak hours and scenarios. b) NYCDOT has recently modified the offset (from 80 to 94 seconds during the weekday AM peak hour and from 51 to 61 seconds during the weekday PM peak hour), please update the LOS analysis in the No-Action, Action and Construction conditions accordingly (official signal timing plan is attached). (NYCDOT_2562)

Response 11-104: The responses provided to, and accepted by, NYCDOT were as follows:

a. The Synchro analysis considered a permitted southbound left turn. The Synchro analyses were updated to reflect a permitted southbound through movement, which also crosses the east crosswalk.

b. The signal timing was updated in the Synchro files in the No Action, With Action, and Construction conditions.

Comment 11-105: Regarding Jamaica Avenue and 213th Street: NYCDOT has recently modified the offset (from 75 to 94 seconds during the weekday AM peak
hour and from 56 to 61 seconds during the weekday PM peak hour), please update the LOS analysis in the No-Action, Action and Construction conditions accordingly (official signal timing plan is attached). (NYCDOT_2562)

Response 11-105: The signal timing was updated in the Synchro files in the No Action, With Action, and Construction conditions.

Comment 11-106: Regarding Hempstead Avenue and 224th Street: Physical inventory and aerial map shows an east crosswalk. However, the LOS analysis considered a protected southbound left turn in the LOS analysis. Please update the LOS analysis during all peak hours and scenarios. (NYCDOT_2562)

Response 11-106: The Synchro analyses were updated to reflect a permitted southbound left-turn movement.

Comment 11-107: Regarding Hempstead Avenue and 225th Street: a) Physical inventory and street map do not show any Right Turn permitted On Red sign on the eastbound approach, please explain why the LOS considered right turns on red permitted during all peak hours and scenarios; b) physical inventory and aerial map shows a west crosswalk, however the LOS analysis considered a protected northbound left turn in the LOS analysis; please update the LOS analysis during all peak hours and scenarios; c) please consider a pedestrian phase in the south crosswalk during the westbound phase during all peak hours and scenarios; d) the existing LOS analysis considered three shared left and through lanes for the westbound approach, however the No-Action LOS analysis considered one left turn and two through lanes during the AM peak hour; please clarify the inconsistency; e) please explain why different cycle lengths (weekday AM – 90 seconds, weekday PM – 100 seconds, Saturday midday – 110 seconds, etc.) are used in the Build LOS analysis during different peak hours. Furthermore 100 and 110 cycle lengths are not cycle lengths NYCDOT uses. In addition, please explain why the mitigation summary did not identify the proposed offset change from 0 to 88 seconds. However, offsets are modified in the Action LOS analysis during all peak hours. Any proposed modifications should be identified and analyzed as mitigation. Please update accordingly. (NYCDOT_2562)

Response 11-107: The responses provided to, and accepted by, NYCDOT were as follows:

a. A sign indicating “AFTER STOP RIGHT TURN ON PERMITTED ON RED” was present on the westbound approach during the time of existing conditions data collection in October 2017. The physical inventory was updated to note the presence of this sign. As the sign has since been removed, the Synchro analyses were updated to
remove the right turn on red in the No Action, With Action, and Construction analyses.

b. The Synchro analyses were updated to reflect a permitted northbound left-turn phase.

c. The Synchro analyses were updated to reflect WALK and flashing DON’T WALK time on the westbound phase.

d. The westbound approach was analyzed with an exclusive left turn lane in instances where it would function as a de facto left-turn. The presence of a de facto left-turn lane is noted in the level of service tables in Appendix F of the EIS.

e. The proposed mitigation measures involving 100- or 110-second long cycle lengths were removed. The level of service tables were updated to show any proposed changes in the offset, as appropriate. Please also see response to Comment 17-71.

Comment 11-108: The Level of Service (LOS) analysis for Jericho Turnpike at Covert Avenue shows the existing LOS is D and the No Build LOS is C. This cannot be correct. (EAM_2563)

Response 11-108: As described in Chapter 11 of the EIS, the No Action condition accounts for the traffic mitigation measures associated with the LIRR's Third Track project at the intersection of Jericho Turnpike with Covert Avenue, which include the reconfiguration of the southbound intersection approach and modifying the signal timing plan to improve traffic operations at this location.

TRAFFIC ANALYSIS – HIGHWAY NETWORK

Comment 11-109: The Cross Island Parkway should be widened to take additional traffic including commercial vehicles so that trucks can drive directly into the development without going through local communities. (Sarro_TS1_888)

Response 11-109: It is illegal for commercial traffic to use the Cross Island Parkway, and it is neither practicable nor reasonably feasible to widen the Parkway and raise bridges so they have enough vertical clearance for trucks to pass under.

Comment 11-110: The portion of the westbound Southern State Parkway feeding into the northbound Cross Island Parkway, particularly the lane reduction from two lanes to one lane on the curved ramp entering northbound Cross Island Parkway, was not observed or analyzed. Please revise analysis accordingly. (Curran_2564)
Response 11-110: As described in Chapter 11 and shown on Figure 11-2 of the EIS, this merge segment was included and analyzed in the VISSIM micro-simulation model.

Comment 11-111: The Parkhurst Civic Association represents 900 families near Belmont. The Tudor Manor Civic Association represents 800 families near Belmont. Our organizations cannot support the project as it will have a negative impact on traffic at the intersection of the Belt, Southern State, and Cross Island Parkways, which is not considered in the DEIS findings. Demand that a complete, comprehensive traffic study is needed to address projected 45,000 vehicles on these roadways and the Grand Central, Elmont Road, Hempstead Turnpike, as well as JFK and LaGuardia expansions and Amazon in Long Island City. This study should also consider attendance at Belmont Park for Belmont Stakes when there is a Triple Crown. (PCA_020, TMCA_024)

Response 11-111: The traffic studies completed as part of the EIS adhered to the scope of work that was published and presented to the public and to the responsible transportation agencies such as NYSDOT, NYCDOT, and NCDPW, and evaluated conditions along four miles of the Cross Island Parkway and at 38 local street intersections. These studies analyzed five key peak traffic analysis hours including worst-case pre-event and post-event arrival and departure hours at the arena when close to 4,500 peak hour vehicle trips are projected to be generated (hourly traffic volumes are the measure used to determine traffic levels of service in case the 45,000 vehicles noted by the commenter refers to a daily volume). The EIS does not address peak hour conditions for Belmont Stakes day since that would be a once-a-year peak hour condition, whereas environmental reviews are based on reasonable worst-case conditions and not the single worst hour of the year. Moreover, there would be no event at the proposed arena on Belmont Stakes day, and activity at the proposed retail village would likely be sharply reduced as any parking provided on the Project Sites would be made available for use by NYRA in connection of the running of the Belmont Stakes. Therefore it would not be considered a “typical” condition either, for analysis purposes. Please also see the responses to Comments 11-40, 11-75, and 11-214.

Comment 11-112: Request that a traffic study be done to analyze the impacts on the Cross Island Parkway. (Culotta_TS1_890, Culotta_TS3_963, Culotta_TS4_1036)

Response 11-112: Detailed traffic studies were conducted for four miles of the Cross Island Parkway between the merge of the Belt Parkway and Southern State Parkway to the south and Jamaica Avenue to the north, including mainline conditions, on- and off-ramp conditions, and weave sections.
These analyses were performed using VISSIM microsimulation software for five traffic analysis peak hours including weekdays and weekends including pre-event and post-event conditions at the proposed arena.

**Comment 11-113:** Please provide the physical inventory for the analyzed merge and weaving locations at the interchanges of the Cross Island Parkway with the Long Island Expressway and Grand Central Parkway. (NYCDOT_2562)

**Response 11-113:** The requested backup data has been provided to NYCDOT.

**Comment 11-114:** Please change the peak hour factor from 0.50 to 0.80 for Vw2 in the LIE eastbound direction in the weaving segment on the collector-distributor road following the off-ramps from the northbound and southbound Cross Island Parkway to the eastbound Long Island Expressway and service road during the Weekday AM peak hour. (NYCDOT_2562)

**Response 11-114:** The peak hour factor has been updated in the analysis.

**Comment 11-115:** The Transportation Chapter says there is an increment of 5 vehicles per hour to 15 vehicles per hour for the on-ramp volume for the No-Action Condition at the intersection of the southbound Cross Island Parkway and the merge from the westbound Long Island Expressway while, according to the analysis, the increment range is higher. Please verify. (NYCDOT_2562)

**Response 11-115:** The text has been verified. As described in Chapter 11 of the EIS, the description of the projected changes in traffic volumes expected within the study area due to the No Action projects is exclusive of background growth. The volumes in the No Action analysis include changes due to No Action projects and background growth.

**Comment 11-116:** Please clarify why samples regarding floating car technique are outside of the analysis hour, as well as why the samples do not follow CEQR guidelines. (NYCDOT_2562)

**Response 11-116:** The cited guidelines in the *CEQR Technical Manual* refer to travel time data collected for air quality analyses. The travel time data collected on the Cross Island Parkway using the floating car technique were not used for detailed mobile source air quality analyses. As discussed in Chapter 12, “Air Quality,” the project-generated traffic volumes would be below the volume threshold screening criteria and a detailed CO microscale analysis was not warranted. Additionally, other sources of travel time data on the Cross Island Parkway were also consulted, including speed data obtained from NYCDOT’s Traffic Management Center on the days of the traffic counts.
Comment 11-117: The CEQR Technical Manual states the following on page 16-17 regarding the use of micro-simulation models: The process should follow recent Federal Highway Administration (FHWA) guidance for the calibration and validation of simulation models. This ensures that model outputs do not under-or over-estimate intersection volumes. What are the calibration targets or Validation Criteria “based on the FHWA: Traffic Analysis Tools: Volume III”? Please provide a report with the calibration parameters and calculations. (NYCDOT_2562)

Response 11-117: The FEIS describes that that FHWA’s Traffic Analysis Toolbox Volume III – Guidelines for Applying Traffic Microsimulation Software was used as guidance for the model calibration targets.

Comment 11-118: Based on the Traffic Analysis Toolbox Volume III: Guidelines for Applying Traffic Microsimulation Modeling Software, please indicate how many simulation model runs were considered and what was the warm up period. (NYCDOT_2562)

Response 11-118: Ten simulation model runs were performed per time period and the warm up period was one hour.

Comment 11-119: In VISSIM, two segments are defined for travel time analysis. What is the travel time standard deviation for each segment and its confidence interval? Why the average travel time of the VISSIM Base model/No Build are lower than the field average travel time? Additionally, the travel time from the simulation model does not match with the travel time from Google Maps. Please clarify the discrepancies. (NYCDOT_2562)

Response 11-119: The field travel times cited represent speed data collected from 6:30 PM to 7:00 PM. Additional travel time and speed data, including speeds obtained from NYCDOT’s Traffic Management Center during the weekday PM peak hour indicate that speeds increase over the course of the 6:30 PM to 7:30 PM peak hour.

PUBLIC TRANSPORTATION

Comment 11-120: For the long term success of this property and the surrounding area, there must be a full time LIRR stop in Elmont along the Main Line. This will not just serve to alleviate traffic from events and other activity at Belmont; it will improve the quality of life for residents in Elmont and Franklin Square by eliminating their need to drive to Queens Village to commute. A full service train station would offset much of the traffic issues examined in the EIS and would further promote mass transit as an easier alternative to driving.
Need a full-time operational LIRR Station at Belmont as an important benefit to nearby residents who deserve a better solution to commuting needs, and a place to park easily and ride the train.

We need a real train station that is part of our community not a separate community that we once again have to drive to.

A full-time train station has been needed for many years, not just for this project.

The community needs a viable train station year round.

If the LIRR rail link is improved, it should allow Elmont residents to have first call access to parking at the station.

The project needs a fully functioning LIRR Belmont Station to provide public transportation.

A full-time LIRR station needs to be a component of this project and is needed to make it work.

Concerned that there is not a full service train station that project participants said was essential to moving the project forward.

Concerned that there is not significant transit access to the site and they are not talking about a full-time train station.

A year-round, full-service train station remains a critical component of the Belmont Redevelopment that the community requires. Although the MTA Chairman Joseph Lhota and professionals from the Federal Transit Administration have expressed the difficulties of adding a service line to Belmont Park during peak hours, a full-service station at Belmont remains non-negotiable. (Alexander_TS1_887, Alfonsi_TS3_953, Alfonsi_TS4_1030, Barley_045, Bizante_TS3_961, BPCC_132, Compo_010, Culotta_TS4_1036, Doyle_1055, Ehrlich_004, Fishbein_TS2_920, Form Letter 5, Gillen_TS3_934, Greene_TS2_924, Grodenchik_TS4_971, Guerrero_TS4_986, Gullo_TS3_939, Horn_TS4_982, Jacob_TS3_954, Jean Pierre_TS3_937, Johnson_146, Johnson_TS1_860, Kamper_TS2_927, Kaplan_2083, Kellher_TS4_997, Kubler_131, Lee_TS1_878, Licari_TS4_1033, Longobardi_TS1_856, Lyons_FL5_038, Marchesella_TS4_1007, Moriarty_2144, Motley_081, Pombonyo_TS2_917, Ra_TS4_969, Sferlazza_2263, Smith_TS1_889, Solages_2402, Solages_TS4_995, Stowe_TS4_1009, Talty_TS2_929, VLI_2125, Walsh_1040, Weissman_TS2_922)

**Response 11-120:** Between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public...
transportation services, along with the existing Belmont Park Station on the spur. This is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets, as documented in the Chapter 17, “Mitigation.”

The new LIRR Elmont Station, which would be located on the LIRR Main Line between the Queens Village and Bellerose stations, would include a total of 150 parking spaces immediately adjacent to the new station in the North Lot reserved for weekday use by commuters. It is anticipated that commuter parking permits would be made available for purchase by Town of Hempstead residents, including those living in Elmont. The new station would also be accessible to pedestrians from Superior Road in Bellerose Terrace. During times when there is no arena event taking place, the service plan for the new LIRR Elmont Station would be expected to be similar to the LIRR Bellerose Station, which has hourly service during off-peak hours and half-hourly service during peak hours, and would provide full-time service to the local community, as requested by numerous speakers from the community and local elected officials during the DEIS public review and comment period.

Comment 11-121: There should be a commitment to link the project to the transit system (LIRR and/or subway) at some point in time in the future.

Recommends access to public transportation.

I believe that every effort should be made to improve the rail service to the proposed site.

Mass transit is needed.

There was no thought of public transportation. (Alfonsi_1044, BPCC_132, Browne_TS4_992, Esposito_CCE_141, Hummel_2288, Moriarty_2144, Schmidt_2278)

Response 11-121: As described in the EIS, the Proposed Project is currently linked to the transit system via the existing LIRR Belmont Park Station on the spur that would provide year-round service for arena events, the Q2 and Q110 bus routes that stop at the bus platforms on the east side of the LIRR Belmont Park Station, and the N1 and N6 bus routes that operate along Hempstead Turnpike.

Between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via stations along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches) and provide more frequent service to and from points west, which would become a major
addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR’s Rockville Centre Station, the Downtown Jamaica area, and park-and-ride facilities, is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets. Please refer to Chapter 17 for additional information and Appendix J for a draft copy of the TMP.

Comment 11-122: Who will pay for any potential future MTA LIRR, NYC Transit bus, MTA Bus or NICE bus transportation facility. (BPCC_132)

Response 11-122: As noted in the response to Comment 11-120, since publication of the DEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur. The Applicant is funding 90 percent of the cost to construct the new LIRR Elmont Station and improve the existing spur to the LIRR Belmont Park Station with the remaining 10 percent provided by the State. The Applicant is also responsible for providing bus pull-outs on both sides of Hempstead Turnpike adjacent to the Project Site. These pull-outs would include amenities such as a shelters and electronic schedule information. There is no requirement for the Applicant to fund the purchase of additional buses for MTA New York City Transit, MTA Bus Company or Nassau Inter-County Express (NICE).

Comment 11-123: The proposed LIRR service will not bring any relief because the people in Nassau won't go to Jamaica to come back to Belmont. The majority of fans are coming from the east so to take the train, do you really expect that fans will be fine having to overshoot the site, go to Jamaica, and then circle back, possibly adding an hour-plus to their commute just by having to time their train's arrival into Jamaica to coincide with one of the only two trains being offered? Nobody from Long Island is going to want to go to Jamaica just to go back to Long Island; they would rather sit in traffic. (Alfonsi_2360, Amato_2362, Mesnick_TS1_870, Mesnick_2237, Pelletiere_TS2_908, Ra_2571, Trainor_TS1_854)

Response 11-123: The assumed LIRR modal split for arena patrons originating from Nassau and Suffolk Counties in Chapter 11 reflected most people would elect to drive rather than having to backtrack through Jamaica, and the majority of LIRR riders were projected to originate from Queens, Brooklyn, and Manhattan.

As noted in the response to Comments 11-120 and 11-121, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line
that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR's Rockville Centre Station, is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets. Please refer to Chapter 17 for additional information and Appendix J for a draft copy of the TMP.

Comment 11-124: I see a disaster with the railroad station being open for commuters if they now have a closer train station to go to. They will leave later and rush and do all stupid moves to get a spot and make the train. While it would be nice to have a train station in Elmont, the beauty of living in Elmont was that you could leave your car at home, walk down the block to catch a bus and take it to the subway....a much cheaper alternative to the LIRR. (Amato_2362)

Response 11-124: As noted in the response to Comment 11-120, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would include parking spaces in the North Lot reserved for weekday use by commuters, so drivers would not have to rush to find a parking space. It is anticipated that the decision of commuters to switch to use the new LIRR Elmont Station would be based on factors such as the provision of commuter parking (for those who use autos) or the proximity to their home (for those who would walk) and some commuters may choose to continue using other LIRR stations or forms of public transportation for their commute based on personal convenience.

Comment 11-125: LIRR service is inadequate for this project. Having two extra trains before or after events is insufficient and will not alleviate traffic concerns. Concerned about how the LIRR plans to operate trains to and from the arena on event days. I am not satisfied with two trains pregame and two trains postgame and I demand that there be more. I do not want to have a missed connection at Jamaica, especially if there are service disruptions. There must be trains running between Jamaica and Belmont every 10-20 minutes or so on event days.

While increased traffic would be a side effect of any project chosen for this site, at best you could only bring close to 2,400 patrons to the project via rail under this plan. Assuming a sellout event, that would leave approximately 16,000 patrons forced to travel by bus, or more likely by
car. If this project is to act as a gateway to Long Island as ESD intends, it needs to be easier to get to than that.

The DEIS does not provide any detail as to what occurs with passengers that might be delayed and miss the LIRR shuttle trains between Jamaica and Belmont Park. (Becker_2329, Browne_TS1_853, EAM_2563, Gillen_TS3_934, Lehman_2364, Mesnick_2237, Nicolello-Muscarella_2107, Solages_TS1_855)

**Response 11-125:** As noted in the response to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. This, and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR's Rockville Centre Station, would result in a major reduction in vehicular traffic volumes that have been projected in the DEIS. The new station would allow for more frequent service to be provided for arena patrons traveling to and from points west and may miss a shuttle train operated between Jamaica Station and Belmont Park Station.

**Comment 11-126:** The LIRR would definitely have to add extra trains to the minimum used Belmont Park Station, which they currently state they will not support. (McGeever_2555)

**Response 11-126:** The LIRR would support additional service to the existing Belmont Park Station. As described in Chapter 11, on days with scheduled events at the proposed arena, the LIRR would provide shuttle service between Jamaica Station and Belmont Park Station, with eastbound trains arriving at Belmont Park prior to the start of the event and westbound trains departing from Belmont Park following the conclusion of the event. As noted in the response to Comment 11-120, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur.

**Comment 11-127:** LIRR trains going into and out from the Belmont Park station do not have a dedicated track, so whenever there is a Belmont train pulling in or out, it disrupts the other line it crosses and LIRR service is disrupted. This will happen for every event. Belmont needs not only a permanent station, but also a dedicated track. (Milazzo_2203)
Response 11-127: Construction of a new dedicated track to serve Belmont Park is neither practicable nor reasonably feasible. As part of the Proposed Project the Belmont Park Station would receive switching and signal equipment upgrades. In addition, as noted in the response to Comment 11-120, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. As described in Chapter 17, during times preceding and following an arena event, the new Elmont Station would be operated in conjunction with the existing Belmont Park Station on the spur. This would allow for service to be provided by the two shuttle trains operating between Jamaica and Belmont Park Station as well as by trains operating along the LIRR Main Line at the new Elmont Station. After an arena event it is possible that up to two additional trains could be operated out of Belmont Park Station to provide additional service to points east or west, if necessitated by customer demand.

Comment 11-128: Has ESD looked at the option of placing a station on the Main Line? For the long term success of this property and the surrounding area, there must be a full time LIRR stop in Elmont along the main line. This will not just serve to alleviate traffic from events and other activity at Belmont; it will improve quality of life for residents in Elmont and Franklin Square by eliminating their need to drive to Queens Village to commute. A full service train station would offset much of the traffic issues examined in the EIS and would further promote mass transit as an easier alternative to driving.

I would suggest that it might make sense to consider placing a platform on the Main Line near the Green and Blue parking lots at the northern edge of the property rather than complicating the switching requirements for the existing spur.

I would also encourage ESD to look at ripping up the spur of track that leads to the current LIRR station and pave a road to create a trolley service from a new Belmont main line station to the arena/shopping village. (Becker_2329, Becker_2292, Gillen_2568)

Response 11-128: As noted in the response to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. This and the demand management
strategies in the TMP would result in a major reduction in vehicular traffic volumes as compared to what was projected in the DEIS. The new LIRR Elmont Station would also provide full-time service to the local community and would include parking spaces in the North Lot reserved for weekday use by commuters. Shuttle bus service would be provided by NYAP between the new LIRR Elmont Station and the arena during events and between the new LIRR Elmont Station and the retail village when the arena is not hosting an event.

**Comment 11-129:** Why can’t Hempstead Branch trains run to and from Belmont? At least have some main line trains stop at Floral Park to accommodate people. (Kamper_TS2_927)

**Response 11-129:** As noted in the response to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. The new LIRR Elmont Station would also provide full-time service to the local community. As described in Chapter 17, the new station would be constructed in two phases, with eastbound Hempstead Branch trains initially serving the station following completion of the first phase of construction. After the second phase of construction is completed, both eastbound and westbound Hempstead Branch trains would be able to serve the station (in addition to trains operating along the LIRR Main Line).

**Comment 11-130:** It would be really great to have a full-time LIRR station. If you are going to an Islanders game or a concert or some other event at the arena and you take the train to the city for work, it would be great if you can park your car in the morning and take the LIRR to the city. An example is the commuter parking offered at Citi Field. There should be a way to have a shuttle service that runs every 20-30 minutes from Belmont to Jamaica. (Keryc_2081)

**Response 11-130:** As described in the responses to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. The new LIRR Elmont Station would also provide full-time service and parking for commuters.

Between publication of the DEIS and the completion of this FEIS, the TMP described in the DEIS has also been further developed, refined, and quantitatively evaluated (see Chapter 17 and Appendix J), including...
demand management strategies aimed at shifting demand from auto to alternate modes of transportation. One such measure would enable arena patrons who regularly commute to New York City using other LIRR branches that would not provide direct service to the new LIRR Elmont Station the option of parking in the North Lot in the morning, using the LIRR for their inbound morning commute, and returning to Belmont Park via the LIRR prior to the arena event.

Comment 11-131: In order to maximize the benefit of the existing train station at Belmont, the eastbound track should be repaired and used so that visitors from the east can transfer at Mineola or another station east of Belmont. (VLI_2125)

Response 11-131: As described in the responses to Comments 11-120 and 11-127, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. During times preceding and following an arena event, the new LIRR Elmont Station would be operated in conjunction with the existing LIRR Belmont Park Station on the spur. After an arena event it is possible that up to two additional trains (for a total of four) could be operated out of Belmont Park Station to provide additional service to points east or west, if necessitated by customer demand. Eastbound service out of the Belmont Park Station would use the eastbound track from the spur. While not currently used for passenger service, the eastbound track is currently used on limited occasions, such as for equipment moves on Belmont Stakes day to bring empty trains that are staged on the Hempstead Branch into the Belmont Park Station for departures after the event.

Comment 11-132: The DEIS does not satisfactorily address the impacts on railroad services. The local railroad line is not a major line and cannot sustain a large increase in ridership. (Moy_148)

Response 11-132: As described in the responses to Comments 11-120 and 11-127, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. During times preceding and following an arena event, the new LIRR Elmont Station would be operated in conjunction with the existing LIRR Belmont Park Station on the spur.
Impacts on railroad services are described in Chapter 17, “Mitigation,” which indicate that the two shuttle trains between Jamaica and Belmont Park Station and regularly scheduled trains traveling along the LIRR Main Line would have sufficient capacity to accommodate the projected ridership traveling to the Project Sites without impacts to regular commuter service, except that after a sold-out hockey game or concert on a weeknight or a Saturday night, an additional eastbound train would need to be provided to accommodate eastbound riders.

Comment 11-133: The 2008 Updated Nassau County Master Plan calls for investment in infrastructure in transportation. Why does ESD and the DEIS not commit to a full-time LIRR station from both the west and east to service the project? How can the project move forward without providing mobility through improved public transportation (LIRR) and without collaborating with the Floral Park community? If ESD claims to have done this, why have the Village of Floral Park community concerns not been addressed.

Response 11-133: As noted in the response to Comment 11-120, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties. The new LIRR Elmont Station would also provide full-time service and commuter parking to the local community, as requested by numerous speakers from the community and local elected officials during the DEIS public review and comment period. This is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets, as documented in the Chapter 17, “Mitigation.”

Comment 11-134: The LIRR has not even surveyed the local community to assess how many local residents use or need LIRR service.

Response 11-134: The LIRR has utilized the results of its 2012-2014 origin-destination survey to estimate commuter ridership at the new station, the origins of commuters that would use it and their mode of travel. This information has been used in planning the design for the new station, which would include pedestrian access from Bellerose Terrace and commuter parking in the North Lot.

Comment 11-135: The most effective way to reduce traffic demand would be improved transit options.

Response 11-135: As noted in the response to Comments 11-120 and 11-121, between publication of the DEIS and the completion of this FEIS, the LIRR has
developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR’s Rockville Centre Station, the Downtown Jamaica area, and park-and-ride facilities as well as charter bus service would result in a major reduction in vehicular traffic volumes as compared to what was projected in the DEIS. Please refer to Chapter 17 for additional information and Appendix J for a draft copy of the TMP. Please also see the response to Comment 11-61.

Comment 11-136: With the addition of a renovated, full-time LIRR-Belmont stop, as well as abundant parking, I think traffic should be fine for the area. (Weiner_2256)

Response 11-136: Comment noted.

Comment 11-137: As long as there are at least the trains to and from Jamaica for the LIRR for each event, the venue will be viable and an economic engine the area desperately needs. (Goldman_2274)

Response 11-137: Comment noted.

Comment 11-138: Belmont should be a full-service station to support the local communities. The last I heard is that there will be two trains before/after events. How many Islander fans from Eastern Nassau and/or Suffolk will take a train into Jamaica and then out to Belmont and do the reverse commute? Who would do that especially on a weeknight when they have to go to work/school the next day.

There is concern that the proposed LIRR service strategies are inadequate. People will not want to have to go out of their way to transfer to an eastbound train to get to an event. (Hellenbrecht_BCCA_052, Henry_2301, Mesnick_2237)

Response 11-138: As described in the responses to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur provide new direct service from Nassau and Suffolk counties without requiring transfer at Jamaica Station and more frequent service to and from points west. The new LIRR Elmont Station would also provide full-time service and parking for commuters. Please also see the response to Comment 11-123.
Chapter 22: Response to Public Comments

Comment 11-139: The development and use of a full-time LIRR station at Belmont would have the potential to alleviate some of the estimated increase in traffic. It would also be a benefit to the surrounding Elmont community which is currently not served by the LIRR. Now it seems that the mega-project is moving forward without making a full time LIRR station at Belmont. Failing to seriously include and show the financing for a full time LIRR station at a proposed major event destination in an already congested metropolitan area is at best shortsighted and at worst shows how badly the developers of the project want to jam this mega-project into this area without any thought as to how it will impact the surrounding area and its residents. (McGovern_2322)

Response 11-139: As described in the responses to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. The new LIRR Elmont Station would also provide full-time service and parking for commuters. As noted in the response to Comment 11-122, the Applicant is funding 90 percent of the cost to construct the new LIRR Elmont Station and improve the existing spur to the LIRR Belmont Park Station with the remaining 10 percent provided by the State.

Comment 11-140: The fact that we have not received guarantees from the LIRR that trains will be added to the Belmont arena during events held at the location is very, very unfortunate. Concern that the MTA is being non-committal on the new train station. (Anskat_2397, Lopez_2557)

Response 11-140: Between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via stations along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches) and more frequent service to and from points west, which would become a major addition to the public transportation services, along with more frequent service to and from the existing Belmont Park Station on the spur. This is further documented, and its benefits evaluated, in Chapter 17, “Mitigation,” of the FEIS.

Comment 11-141: Given the significant adverse traffic impacts resulting from this project, I strongly urge ESD to work with the LIRR to make improvements to the Belmont Park Station so it can directly serve riders traveling eastbound and westbound. The added convenience of direct service from eastern

22-205
Long Island without a transfer at Jamaica will make LIRR a more attractive traveling option, help reduce the need for parking spaces, and reduce the overall traffic impacts. (Culotta_2365)

Response 11-141: Comment noted.

Comment 11-142: A non-negotiable aspect of the project must be a full-time train station paid for by the developer that will service the project. The project must be designed so the train station is up and running with the ceremonial ribbon cutting. Furthermore, the costs of the train station must be borne by the developer, not the taxpayers and not from the coffers of the cash-strapped MTA. (Ambrosino_2223)

Response 11-142: As noted in the responses to Comments 11-120 and 11-152, a new LIRR Elmont Station is to be developed on the LIRR Main Line. Eastbound service would be available upon arena opening, with westbound service expected to be provided by 2023. The Applicant is funding 90 percent of the new station’s construction costs, with the remaining 10 percent provided by the State.

Comment 11-143: In favor of the development but not without a full time station and other traffic solutions. (Bailey_2201)

Response 11-143: Comment noted.

Comment 11-144: An arena is not viable unless LIRR access is improved; not just as a westbound spur.

Suggests direct train lines to eastern Long Island to make mass transit more feasible without switching in Jamaica and backtracking. The plan for the LIRR to force eastbound passengers to change at Jamaica for arena events is counter-intuitive. There should be direct access to the arena from LI especially with the third track coming along. The DEIS fails to provide a LIRR direct route for those coming from the east.

A full-time train station with east and west service is necessary to make this project work.

Need a direct train or people will use their cars. Why doesn't the MTA include a direct line coming in from the east into Belmont to relieve some of the traffic concerns.

A fulltime station with east to west service with a park-and-ride option would provide the proper relief to the already overloaded CIP. (Amato_TS1_846, Becker_2292, Buckvar_1054, Culotta_2365, Culotta_2572, Ehrlich_004, Gunther_TS3_938, Gunther_2344, Kaminsky_TS1_845, McGunnigle_015, Pedley_TS4_993, Steven_2102, Vallone_2261)
Response 11-144: As noted in the response to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. This and the demand management strategies in the TMP would result in a major reduction in vehicular traffic volumes as compared to what was projected in the DEIS.

Comment 11-145: A full service LIRR station should be included, and the LIRR extended to Elmont.

A railroad station would be a long-term benefit for both residents and the fans.

Continue efforts to secure a full-time LIRR station at Belmont, which I believe complements this project and renders it more likely to succeed.

Suggest increase of LIRR Service to reduce the burden of traffic on local roads.

Development at Belmont will lead to LIRR renovations in the future and better service.

I know that the LIRR train station will probably be extended to handle more train cars. This will come at a cost, but I believe if handled with clear estimation of the possible train commuters including the racetrack (Belmont Stakes), this will be a viable way of entry to the new arena and racetrack. (Bayat_2105, Bosworth_2100, Conterelli_017, Gorry_TS4_1010, Fernandes_2556, Leone_2254, Marinacci_TS4_998, Swaby_MM_1045, Viscovich_096, Zimmerman_TS4_1000)

Response 11-145: As noted in the responses to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. This is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets, as documented in the Chapter 17, “Mitigation.” The new LIRR Elmont Station would also provide full-time service to the local community and would include parking spaces in the North Lot reserved for weekday use by commuters.
Comment 11-146: Any final project must include a full-service Long Island Rail Road (LIRR) Station with—both east to west capacity and a park and ride option—that serves our riding public 365 days a year.

To build this project and not have a fully functioning train station with a commuter hub for local residents is a nonstarter.

A full functioning LIRR station is a must (including park and ride options.)

The following demand should be placed into the lease and liquidated damages be given to the municipality if they are not met: a train station and commuter hub. (Comrie_104, Comrie_134, Comrie_TS4_968, Solages_TS1_855, Solages_TS1_855)

Response 11-146: As noted in the responses to Comments 11-120 and 11-121 above, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. This and the demand management strategies in the TMP would result in a major reduction in vehicular traffic volumes as compared to what was projected in the DEIS. The new LIRR Elmont Station would also provide full-time service to the local community and would include parking spaces in the North Lot reserved for weekday use by commuters.

Comment 11-147: Stantec’s proposed rail planning for the Project Sites includes one seat ride service from Belmont Park to Penn Station at higher frequencies than existing Floral Park service. Floral Park residents do not have similar access to one seat ride service to Penn Station with fewer direct trains operating that do not require a change at Jamaica. (McEnery_2337)

Response 11-147: The referenced LIRR service requests were made on behalf of the Applicant to ESD prior to completion of the DEIS. As noted in the response to Comment 11-160, ESD has met with LIRR throughout the preparation of the EIS. The LIRR service to Belmont Park Station analyzed in the DEIS reflects coordination with the LIRR in terms of the train service that could be provided to the Belmont Park spur during the weekday PM peak period without impacts to regular commuter service on the LIRR Main Line.

As noted in the responses to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur and provide new direct service from Nassau and Suffolk counties and more frequent
service to and from points west. This is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets, as documented in Chapter 17, “Mitigation.”

The new LIRR Elmont Station would also provide full-time service to the local community, including service on non-event days. During times when there is no arena event taking place, the service plan for the new LIRR Elmont Station would be expected to be similar to the LIRR Bellerose Station, which is served by the same trains that stop at the LIRR Floral Park Station; it would have half-hourly service during peak hours and hourly service during off-peak hours.

**Comment 11-148:** The project presents the opportunity to create a full-time station with adequate parking for area communities. (Ra_2571)

**Response 11-148:** Comment noted.

**Comment 11-149:** Full-time LIRR service should be brought to Belmont Station to reduce auto traffic to the project.

LIRR facilities to the existing station must be enhanced to provide service that will be an incentive to the public to forgo their car and take the train.

Without proper railroad service to and from the park, even its original plan, our area will suffer great stress to our roadways and commute time.

Without a full functioning LIRR station, the area will be inundated with traffic and pollution.

Limitations on existing railroad facilitates will lead to added congestion on roads.

A full service LIRR Station would offset many of the traffic issues.

Without a FULL service LIRR station in place this project will strangle surrounding communities with traffic.

Without direct access to the Long Island Rail Road, the neighboring roads will be in complete disarray and parking for residents will practically be nonexistent.

With regard to Transportation, the unanswered questions encompass, but are not limited to, the Long Island Rail Road and the acknowledged need for a fully functioning station at Belmont Park to mitigate the significant adverse impacts of traffic congestion on the Cross Island Parkway and surrounding local streets; and numerous other areas cited in the public testimony. (Brush_130, FPBPTA_2226, Gillen_TS3_934, Konigsberg_089, Mchale_2281, Moy_148, Pombonyo_2398, Post_091, Solages_2402, Tommy_040)
Response 11-149: As noted in the response to Comments 11-120 and 11-121, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR's Rockville Centre Station, the Downtown Jamaica area, and park-and-ride facilities as well as charter bus service would result in a major reduction in vehicular traffic volumes, and which would reduce automobile emissions (though the analysis in Chapter 12, “Air Quality,” did not find the potential for significant adverse air quality impacts). Please refer to Chapter 17, “Mitigation,” for additional information and Appendix J for a draft copy of the TMP.

Comment 11-150: Public transportation is inadequate and increased traffic would produce increased emissions. (Weiner_SSAS_2097)

Response 11-150: With respect to the concern about inadequacy of public transportation, please see the response to Comment 11-121. The EIS did not identify air quality as significant adverse impacts. See EIS Chapter 12, “Air Quality,” for a discussion of Project effects on air pollutant increases.

Comment 11-151: The Nassau County Village Officials Association is in agreement that if the development project is approved, such approval be conditioned on, and require that, the current rail station be transformed into a full-service train station, and that the developer be required to bear and pay all costs associated with the upgrade of the station, without the expenditure of public resources (tax revenue, bond proceeds or otherwise) to rebuild said station. (BPCC_2085)

Response 11-151: Comment noted.

Comment 11-152: The Parkhurst Civic Association represents 900 families near Belmont. The Tudor Manor Civic Association represents 800 families near Belmont. Our organizations cannot support the project without 24/7 LIRR service. Demand that the project be held at bay until Railroad service is completed.

While project proponents identified a full time LIRR Station at Belmont as essential to the project, the DEIS proposes only adding two extra trains when there are events in the arena, which is clearly insufficient. Requests a firm commitment from NYS and MTA for a full time, year-round train station at Belmont to be constructed and operational prior to
Chapter 22: Response to Public Comments

 commence a full functioning LIRR station should be constructed prior to the commencement of the arena.

While project proponents identified a full time LIRR Station at Belmont as essential to the project, the DEIS proposes only adding two extra trains when there are events in the arena, which is clearly insufficient. Requests a firm commitment from NYS and MTA for a full time, year-round trains station at Belmont to be constructed and operational prior to commencement of events at an arena or the addition of any facilities at Belmont.

The project should not be completed until full time LIRR service is provided.

Ensuring the full time station is fully operational by the time the project is completed is essential. (Alfonsi_2567, Buechler_FL2_026, Crowe_FL8_2073, Coven_2232, Fitzgerald_TS4_975, Form Letter 2, Form Letter 8, Kelleher_TS1_859, PCA_020, TMCA_024, Vallone_2261)

Response 11-152:  As noted in the response to Comment 11-120, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line. The south platform of this station would be completed in 2021 prior to opening of the arena and provide eastbound service, while the north platform and westbound service would not be operational until the completion of the East Side Access and Third Track projects (expected in 2023). Demand management strategies including shuttle bus service from other LIRR stations would be implemented during this interim period, as discussed in Chapter 17, “Mitigation.”

Comment 11-153:  A full time train station is required to open before the project opens, but who is going to pay for it. (Gonzalez_TS1_847)

Response 11-153:  As noted in the response to Comment 11-152, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line. Eastbound service at this station would be operational in 2021 prior to opening of the arena, while westbound service would not be operational until the completion of the East Side Access and Third Track projects (expected in 2023). As noted in the response to Comment 11-122, the Applicant is funding 90 percent of the cost to construct the new LIRR Elmont Station and improve the existing spur to the LIRR Belmont Park Station with the remaining 10 percent provided by the State.
Comment 11-154: A study of the capacity at Penn Station to support the increased trains necessary for Belmont must be completed, with public information on its scope, budget, funding, and schedule. (BPCC_132)

Response 11-154: Studying the capacity of Penn Station is not required as the LIRR service planned for the Proposed Project does not involve adding more trains to or from Penn Station. As described in Chapter 17, “Mitigation,” during times preceding and following an arena event, the new Elmont Station would be operated in conjunction with the existing Belmont Park Station on the spur. The new Elmont Station would be served by trains operating along the LIRR Main Line (i.e., along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma Branches) while the Belmont Park Station would be served by shuttle trains operating to and from Jamaica.

Comment 11-155: The DEIS considers the LIRR to be part of the solution, but as such, it is part of the problem. As with the TMP, the DEIS relies on a currently nonexistent LIRR plan and does not recognize the realities of the LIRR. The current Belmont LIRR service is poor, and the proposal to add two trains before and after events is inadequate. To add full service is not practical if even possible. The LIRR is already overburdened and underfunded. Moreover, the LIRR is inconvenient for Belmont visitors and event attendees from eastern Long Island, and will therefore be ineffective.

The LIRR will never expand enough to support it and get a full time station, and is too expensive to try as NY has more important priorities to spend money on. (Morgo_2327, Weiner_SSAS_2097)

Response 11-155: As noted in the response to Comments 11-120 and 11-121 between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties and more frequent service to and from points west, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP would result in a major reduction in vehicular traffic volumes as compared to what was projected in the DEIS. Please refer to Chapter 17, “Mitigation,” for additional information and Appendix J for a draft copy of the TMP. As noted in the response to Comment 11-122, the Applicant is funding 90 percent of the cost to construct the new LIRR Elmont Station and improve the existing spur to the LIRR Belmont Park Station with the remaining 10 percent provided by the State.
Comment 11-156: ESD should study the likely use of alternative LIRR stations (Floral Park and Bellerose stations), as LIRR service to Belmont Park will likely be inadequate. (Culotta_2572)

Response 11-156: The use of Floral Park Station and Bellerose Station as alternate LIRR stations would require running shuttle buses through these communities and has been precluded as an option. As noted in the response to Comments 11-120 and 11-121, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via stations along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches) and more frequent service to and from points west, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. As noted in Chapter 17, “Mitigation,” a shuttle bus service to the LIRR Rockville Centre Station would be implemented as a demand management strategy to provide a connection from the LIRR’s Babylon Branch.

Comment 11-157: There is no LIRR station that can handle the crowds this project would bring.

Concerned LIRR will not be able to handle increased volume due to development.

Concerns that the LIRR service is terrible during Belmont Stakes, and that neither the existing line nor station is built for massive influx of riders.

LIRR station currently has difficulty with large crowds at Belmont.

How would the surge of attendees letting out after an arena event be managed on train platforms, with up to 2,000 LIRR riders vying for the shuttle back to Jamaica? (BPCC_132, EAM_2563, Harrington_2067, Mesnick_TS1_870, Palamar_2240, Sullivan_2359)

Response 11-157: As described in the responses to Comments 11-120, 11-121 and 11-127, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches) and provide more frequent service to and from points west, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. Therefore, arena patrons would be served by trains at two stations and multiple LIRR branches, not just via the trains currently operated to and from the Belmont Park Station on the spur during racing.
season. After an arena event it is possible that up to two additional trains could be operated out of Belmont Park Station to provide additional service to points east or west, if necessitated by customer demand. The Belmont Park Station has two high-level platforms, which could hold up to four trains of 10 cars each and would allow for riders to board empty trains that are waiting at the station immediately following an event. The flow of riders to the new LIRR Elmont Station after an event would be metered by arena patrons taking shuttle buses to the new station. The TMP, a draft copy of which is included in Appendix J of the FEIS, includes an operations plan that provides further details about pedestrian circulation during arena events.

Comment 11-158: Would like to see rail transportation the same way they do it when hosting Belmont Stakes. (Pansa_2103)

Response 11-158: The LIRR implements a special service plan on the Saturday of the Belmont Stakes, which does not coincide with the weekday peak periods for commuters, that is neither appropriate nor necessary to handle the projected ridership associated with the proposed arena. In addition, with the Proposed Project during times preceding and following an arena event, the new Elmont Station would be operated in conjunction with the existing Belmont Park Station on the spur.

Comment 11-159: ESD should publish internal correspondence between it and LIRR regarding operational and capital improvements at the Belmont Park station. (Culotta_2365, Culotta_2572)

Response 11-159: Comment noted.

Comment 11-160: The analysis relies on having two round trip Jamaica-Belmont LIRR trains for arena events, with no MTA correspondence to substantiate the claim.

Too many people are considered to rely on LIRR, especially since the report numbers rely on standing-room-only capacity. The M-3 cars cited in the report will be out of service and replaced by slightly-smaller M-9 cars by 2020, so there will be 8 percent less capacity for riders. The impact of stopping the main line on many more days each year is never analyzed. This denotes a lack of coordination with MTA.

There is no discussion as to the mechanism where MTA stops trains on the main line to accommodate Jamaica-Belmont shuttle trains. The DEIS does not analyze impacts to LIRR mainline train riders from Jamaica-Belmont trains: many extra days a year, and during PM peak hours (generally off-peak today).
How will the MTA manage the Belmont Spur and trains along the LIRR Main Line? (EAM_2563)

Response 11-160: In a letter from LIRR to NYAP (see Appendix M), LIRR has committed to providing two 10-car trains to the Belmont Park Station spur in connection with arena events, which would consist of M-3 cars.

Comment 11-161: With the lack of dedicated bus lanes, buses will wind up in the same traffic as the cars during peak hours. (VLI_2125)

Response 11-161: As shown in Chapter 17, “Mitigation,” with the implementation of proposed mitigation measures, only two intersections along the Hempstead Avenue/Turnpike bus corridor would have impacts that could not be fully mitigated. These include the intersection of Hempstead Avenue at Springfield Boulevard (which would have unmitigated impacts during the weekday AM and Saturday Midday peak hours) and the intersection of Hempstead Avenue at 225th Street (which would have unmitigated impacts during the weekday PM, Saturday Midday, and Saturday PM peak hours).

Comment 11-162: There are significant concerns regarding east-west traffic flow and its impact on NICE Bus service. NICE Bus was informed that multiple turn lanes and coned areas are planned for during events, however, there is no plan in place to increase east-west through traffic flow. The current mitigation plan reduces east-west traffic to one lane. This issue will be compounded by regular commuter car traffic in the PM peak hour and made even worse by holiday shoppers during December. It is requested that additional roadway improvements are incorporated into the project to prevent major disruption to bus traffic along the corridor. The N6 is one of the busiest suburban routes in the US, carrying over 18,000 people a day. Throughout the peak period, buses are planned every 6 minutes along the route. NICE Bus is concerned that the traffic plan doesn’t consider the heavy volume of east-west commuter traffic which potentially cause significant delays for bus passengers during major events. (Curran_2564)

Response 11-162: The traffic mitigation measures proposed in the DEIS did not reduce eastbound or westbound traffic on the Hempstead Avenue/Turnpike corridor to a single lane at any location; a minimum of two through lanes were provided in each direction throughout the corridor. The traffic mitigation measures proposed in the FEIS have been updated to reflect comments received by NYSDOT and NICE Bus and reflect three eastbound through lanes at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road.
Following consultation with NICE, NYAP has committed to install bus pull-outs and shelters along both directions of Hempstead Turnpike adjacent to the Project Sites to alleviate congestion in travel lanes when buses stop to drop-off and pick-up passengers and to provide bus stops in closer proximity to the project components and the Belmont Park Racetrack for employees and visitors that would use the N1, N6, and N6X bus routes.

The traffic analyses provided in the FEIS analyzed a total of 24 intersections along the Hempstead Turnpike/Hempstead Avenue/Jamaica Avenue corridor on which the N6 bus route operates, and mitigated all but one location during the weekday PM peak hour. The project site is served by three interchanges on the Cross Island Parkway, which would distribute a significant portion of project-generated traffic away from needing to use the Hempstead Avenue/ Turnpike corridor in accessing the Project Sites. The highest concentrations of project-generated traffic during the weekday PM peak hour would occur on the segment of eastbound Hempstead Avenue/Turnpike between the intersections of the southbound Cross Island Parkway off-ramp and Locustwood Boulevard/Gate 5 Road. There are no traffic signals along eastbound Hempstead Avenue/Turnpike between the intersections of 225th Street and Wellington Road, and inbound traffic using Gate 14 west of Wellington Road would not need to stop at any traffic signals along this portion of the corridor. An additional eastbound left-turn lane and an exclusive eastbound left-turn signal phase has been proposed to be added to the intersection of Hempstead Turnpike and Locustwood Boulevard/Gate 5 Road to accommodate the additional traffic entering the Project Sites at Gate 5.

Comment 11-163: Belmont needs not only a permanent station, but a dedicated bus depot. (Milazzo_2203)

Response 11-163: As noted in the response to Comment 11-121, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line. None of the bus service providers (NICE, MTA Bus Company, MTA New York City Transit) has cited a need for a dedicated bus depot.

Comment 11-164: Will upgrades to the existing Belmont Park Long Island Rail Road Station include a bus terminal to accommodate NICE, New York City Transit bus, MTA bus and private bus charter operators who may establish new routes for serving the Islanders Belmont Arena. (BPCC_132)

Response 11-164: A bus terminal is not needed to serve agency or Proposed Project needs. As noted in Chapter 11, the Q2 and the Q110 bus routes both stop at the bus platforms on the east side of the LIRR Belmont Park Station.
Chapter 22: Response to Public Comments

Comment 11-165: Will there be expansion of existing bus services including but not limited to the NICE Bus N6 and N6X, NYCT Q1, Q27, and Q88. (BPCC_132)

Response 11-165: The Proposed Project does not include an expansion of existing public bus routes that do not currently serve the Project Sites. The TMP describes the implementation of additional shuttle bus service during arena events that would provide service to the LIRR Rockville Centre Station, the Downtown Jamaica area, and to several remote parking facilities.

Comment 11-166: What about bus service on game days? There is not going to be sufficient bus service to handle the traffic flow or transit load that travel by bus or train. (McDonald_TS3_936)

Response 11-166: The EIS included an assessment of bus service to the Project Sites and indicated that it is likely that the Proposed Project would result in a significant adverse impact to bus routes during time periods before and after arena events; it is anticipated that any need for an increase in service would be coordinated with NYAP as part of the TMP. As described in the response to Comments 11-120 and 11-121, since the publication of the DEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties and more frequent service to and from points west, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR’s Rockville Centre Station, the Downtown Jamaica area, and park-and-ride facilities, is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets.

Comment 11-167: Regarding NICE bus service, what studies were done to determine the socioeconomic impact to residents that rely on this bus service regarding time added to their daily commute. (VFP_2548)

Response 11-167: The requested socioeconomic analysis is outside the scope of SEQRA.

PARKING

Comment 11-168: Recommends that the applicant consider electric vehicle charging stations as a means to encourage further reductions in emissions from transportation. (Alfonsi_1044, Esposito_CCE_141)

Response 11-168: Comment noted.
Comment 11-169: The DEIS asserts there will be 40 spaces available at Site A for the hockey teams to park. A single hockey team consists of 23 players plus coaches, management and a medical team. Considering there will be two hockey teams, requiring 40 parking spaces is not sufficient for both hockey teams. Is it enough to accommodate the needs of concert performers? (EAM_2563)

Response 11-169: In the NHL, the visiting hockey team normally travels to an arena by charter bus and does not require automobile parking spaces. Forty parking spaces are also sufficient to accommodate the needs of concert performers, who also typically travel to venues by charter bus.

Comment 11-170: The parking calculations are not consistent with ITE data and land use peaking characteristics. Hotel peak parking is during the day rather than overnight, with less than 1 space per room. Arena peak parking lasts for 1-2 hours, shorter than the duration of games and concerts. There is no “cushion” as ITE recommends for large parking areas. With a more realistic 8 percent transit credit and 5 percent cushion, they need over 9,000 spaces but only have 8,252 (including 40 set aside for the Islanders).

Table 11-39 through Table 11-44 in the DEIS show the projected parking demand for the proposed land uses. However, it is unclear how these numbers were arrived at. How did the applicant predict how many parking spaces are going to be needed? On what basis? They discussed how they obtained the arena parking demand, but not the retail, hotel, community space, and office space. Why did the applicant not utilize an accepted standard such as the ITE Parking Generation to determine how many parking spaces are required? (EAM_2563)

Response 11-170: As described in Chapter 11, the temporal distributions for the retail use were based on those from Bicester Village and the temporal distributions for other non-arena uses were based on those from the 2013 Willets Point Development FSEIS. These temporal distributions were provided for a complete 24-hour period for both typical weekday and weekend and therefore, provide comprehensive parking demand projections for each individual use for each hour over a typical day. These comprehensive parking demand projections show that parking demand for one use may be high while the parking demand for another use may be low during the same hour such that the parking demand from various uses could be accommodated by the same parking space during different times of the day. This provides a more realistic overall peak parking demand projection and is reflective of the shared parking supply utilized by the Proposed Project. The arena peak parking lasts for 1-2 hours, shorter than the duration of the games and concerts because it is assumed some patrons would arrive late to the game/concert and some patrons would
depart early before the game/concert finishes. Please also see response to Comment 11-171.

**Comment 11-171:** The DEIS does not satisfactorily address impact on parking. (Moy_148)

**Response 11-171:** The EIS fully addresses the impacts of the Proposed Project on parking by projecting the hour-by-hour accumulation of parking for a 24 hour period on the site for five scenarios: 1) a weekday with a sold-out hockey game (18,000 seats) starting at 7:30 PM; 2) a weekday with a sold-out concert (19,000 seats) starting at 8:00 PM; 3) a Saturday with sold-out Disney on Ice shows (11,500 seats) starting at 11:00 AM, 3:00 PM, and 7:00 PM; 4) a Saturday with a sold-out hockey game (18,000 seats) starting at 7:00 PM; and 5) a Saturday with a sold-out concert (19,000 seats) starting at 8:00 PM. Table 11-44 compares the peak parking accumulation hours to the amount of parking being provided on the Project Sites and the North, South, and East Lots—with the results showing that there would be ample parking supply on-site to accommodate all users in each of these scenarios and the parking demand for live racing at Belmont Park.

Between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line and a comprehensive TMP has been developed to implement demand management strategies that would reduce the reliance on private auto use by arena patrons and consequently result in a reduction of parking demand during times of events. While the addition of the new LIRR Elmont Station would result in new parking demand by commuters in the North Lot, this parking would primarily occur during the day on weekdays and would not significantly overlap with arena events taking place on a weekday evening or a Saturday.

While the EIS points out that there is a potential that arena patrons may attempt to park for free on-street in the surrounding neighborhoods to avoid paying for parking, it indicates measures that would be taken to prevent this from happening. The TMP includes a monitoring plan that would measure the use of on-street parking spaces in the surrounding residential neighborhoods during different types of events and on non-event days, and potential mitigation measures that could be implemented should parking in other residential neighborhoods occur. Please also see the response to Comment 11-178.

**Comment 11-172:** The amount of proposed parking is drastically inadequate for NHL and other select events. Assuming all seats are filled in the arena, it would mean that each vehicle would carry up to 10 attendees.
Concerned that the parking in the plan is inadequate for the number of expected visitors.

Where will attendees park? It does not seem as though there is enough parking for 19,000 seat arena.

The Belmont plan has insufficient available parking spaces.

How do you expect to provide parking for a stadium event that will have nineteen thousand (19,000) seats plus, everything else going on at the same time at the property? (Brown_TS4_974, Carlapasso_TS3_940, McDonald_TS3_936, McEnery_TS3_951, Moriarty_2144, Ohagan_053, Trentacoste_TS2_902, Wagner-Tyson_TS2_918)

Response 11-172: As noted in the response to Comment 11-171, the amount of parking being provided on the Project Sites and the North, South, and East Lots would be sufficient to accommodate the Proposed Project's needs, accounting for the demands of the retail, hotel, office, community space, arena, and live racing at Belmont Park. As noted in Chapter 11, cumulative parking demand for the Proposed Project and NYRA events under reasonable worst-case conditions is less than the total number of available spaces provided on Sites A and B and the North, South and East Lots.

Comment 11-173: How will 8,250 parking spots enough for 47,000 daily visitors? Will each car conceivably hold six people. (Alfonsi_2360)

Response 11-173: As noted in the response to Comment 11-91, it was identified that a total attendance of 45,000 daily visitors could only occur on 10 to 15 days over the course of the year, such as on a day with three sold-out Disney-on Ice Shows each having an attendance of 11,500. Given that these are three separate shows spaced throughout the day, the total number of daily visitors would not all be on-site at the same time. Table 11-44 of the FEIS demonstrates that the available parking supply of 7,804 parking spaces provided on the Project Sites and the North, South, and East Lots would be sufficient to accommodate the maximum parking demand generated by the Proposed Project and the combined parking demand for the Proposed Project and live racing at Belmont Park, including a scenario on a Saturday afternoon with a sold-out Disney on Ice show at the arena, peak shopping demand from the retail village, and live racing at Belmont Park.

Comment 11-174: You have a 19,000 seat arena and you have 12,000 parking spaces...so where will employees park? And if you open up a full-time train station, parking spaces will be filled with late comers from the city, so there will be even less spaces for people going to games and concerts. (Amato_2362)
Response 11-174: As noted in the response to Comment 11-171, the amount of on-site parking being provided would be sufficient to accommodate the Proposed Project’s needs. The parking demand projections in the parking analyses account for both employees and patrons of the Proposed Project.

As described in the responses to Comments 11-120 and 11-121, since publication of the DEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line to augment its existing service to the Belmont Park Station on the spur provide new direct service from Nassau and Suffolk counties and more frequent service to and from points west. The new LIRR Elmont Station would also provide full-time service and parking for commuters. The assessment of parking conditions in Chapter 17, “Mitigation,” of the FEIS accounts for the presence of this commuter parking and shows that there would be a net reduction in parking demand by arena patrons during times of event due to the addition of the LIRR Elmont Station and the implementation of the demand management strategies included in the TMP.

Comment 11-175: Concerned there is not enough parking for the fans. Fans will have to take shuttle transportation, at least from the large East and North Lots. This is difficult after games when people leave at the same time. (BPCC_2126)

Response 11-175: As noted in the response to Comment 11-171, the amount of on-site parking being provided would be sufficient to accommodate the Proposed Project’s needs, including arena patrons and employees during events. The TMP for the arena, a draft copy of which is included in Appendix J of the FEIS, includes an operations plan that provides further details about the extensive shuttle bus system provided by NYAP that would be utilized to transport patrons between the arena, the North and East Lots, as well as from the new LIRR Elmont Station. This is similar to the shuttle bus operation that is utilized by NYRA to the parking lots on Belmont Stakes day.

Comment 11-176: How are you going to handle parking for Belmont Stakes day? I don’t suggest a parking garage here in Elmont. It is not only an eyesore but dangerous. I don’t advise underground parking, because it is not safe unless you’re putting a guard at every corner. (Amato_2362)

Response 11-176: As described in Chapter 1, “Project Description,” any parking provided on the Project Sites would be made available for use by Belmont Park in connection of the running of the Belmont Stakes and there would be no arena events held on Belmont Stakes day. Chapter 15, “Construction,” provides a discussion of how parking demand would be accommodated on Belmont Stakes day over the course of construction of the Proposed Project. Upon completion of the Proposed Project, Belmont Park would contain over 9,300 parking spaces (including additional spaces in the
White Lot, Pony Track, and a portion of the Blue Lot that are used as overflow parking for Belmont Stakes day), which is sufficient to accommodate the parking demand on Belmont Stakes day, which has ranged from 6,537 to 8,932 spaces during the running of the Belmont Stakes in 2016, 2017, and 2018. With respect to security within parking facilities, as noted in the response to Comment 3-6, the Applicant would provide security personnel and CCTV in parking lots.

Comment 11-177: Concern that the proposed parking is inadequate for the number of expected visitors during arena events and that there will be overflow parking on residential streets.

Overflow parking will spill into residential streets, creating Belmont Stakes-like congestion in Floral Park. (Chatterton_T32_903, Form Letter 5, Lyons_FL5_038)

Response 11-177: As noted in the response to Comment 11-171, the amount of on-site parking being provided would be sufficient to accommodate the Proposed Project’s needs. Overflow parking onto residential streets is not expected or needed to meet parking demand. Please also see the response to Comment 11-178.

Comment 11-178: During Belmont Stakes Day people park along overcrowded streets; it is difficult to find parking in one’s own neighborhood. New York Arena Partners will have to coordinate with local municipalities to ensure residents are able to park within the vicinity of their home without competing with fans and shoppers.

Concerned that patrons will park outside the arena on local streets.

Concerned that people will park on local streets to avoid traffic and parking fees. (Alfonsi_T3S_953, Amato_T31_846, Gunther_2344, Labissiere_T34_1006, McCaffrey_T34_976, Mesnick_2237, Mullen_T32_898)

Response 11-178: As noted in the response to Comment 11-171, the amount of parking being provided on the Project Sites and the North, South, and East Lots would be sufficient to accommodate the Proposed Project’s needs. As shoppers at the retail village would not be charged a parking fee, and pedestrian entrances to Site B would not be provided from Huntley Road,
Wellington Road, or Hathaway Avenue, it is not anticipated that retail village visitors would attempt to park on residential streets. The EIS points out that there is a potential that arena patrons may attempt to park for free on-street in the surrounding neighborhoods to avoid paying for parking, and the Mayfair Avenue Gate (Gate 9) would be enhanced or staffed with a security guard to close the pedestrian entrance during arena events to prevent arena patrons from parking in the West End of Floral Park and walking in to the North Lot to catch a shuttle bus to the arena. Additionally, LIRR tickets would be required to be presented for pedestrian access from the LIRR Elmont Station to the North Lot to prevent arena patrons from parking in Bellerose Terrace and catching a shuttle bus to the arena. As part of the TMP, a draft copy of which is included in Appendix J of the FEIS, a monitoring plan would include observations of use of on-street parking spaces in the surrounding residential neighborhoods during different types of events and on non-event days. Should parking in other residential neighborhoods occur, potential mitigation measures that could be implemented to address this issue are discussed in Chapter 17, “Mitigation.”

**Comment 11-179:** Without direct access to the Long Island Rail Road, the neighboring roads will be in complete disarray and parking for residents will practically be nonexistent. (Solages_2402)

**Response 11-179:** As noted in the response to Comment 11-120, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets, as documented in Chapter 17. With regard to parking for residents, please see the response to Comment 11-178.

**Comment 11-180:** The State of New York must ensure that whatever DEIS is accepted has parking facilities that are self-sufficient to the greatest extent possible. (McEnery_2392)

**Response 11-180:** As noted in the response to Comment 11-171, the amount of on-site parking being provided would be sufficient to accommodate the Proposed Project’s needs.

**Comment 11-181:** Use Site B for parking only.
Response 11-181: Chapter 16, “Alternatives,” of the FEIS considers alternatives to the Proposed Project including an Alternate Site Plan Alternative where Site B is only used for approximately 2,360 spaces of at-grade parking, open space, and community space and a No Retail Village Alternative where Site B is only used for approximately 2,600 spaces of at-grade parking and open space.

Comment 11-182: The report states that they haven’t resolved the parking issue. They haven’t resolved who is to be responsible, and where these spaces are going. The mechanisms for the parking between the entities hasn’t been approved yet. The DEIS should not be made public until this is addressed.

It appears that while on the one hand ESD and NYAP assert that things are beyond the scope of the study such as working with NYRA, then are going to enter into a parking agreement with NYRA, which is not right.

The DEIS on page 11-15 states “parking on the North, South, and East Lots is anticipated to be made available for arena events through a shared parking agreement to be negotiated between the Franchise Oversight Board (FOB) and NYRA.” Does this mean there is no actual parking agreement to utilize those lots? Since the use of all these lots are necessary to address project-generated traffic, the applicant’s methodologies and the basis for the applicant’s conclusions are questionable to complete an analysis of this scale without having something as essential as a parking plan fully in place. If it is uncertain if all these lots can be used to meet the demands, a smaller-sized project should be considered. (EAM_2563, McEnery_TS1_886, Schneider_TS1_849)

Response 11-182: NYAP and NYRA have met to discuss and coordinate shared parking needs. A shared agreement among NYAP, the FOB, and NYRA would be in place prior to closing, through which parking demand for NYAP and NYRA could be accommodated within the proposed and existing areas at Belmont Park.

Comment 11-183: The proposed shared parking agreements for the North, South, and East lots are deemed “possible,” and would require attendees to walk considerable distances from their cars to the arena. Would attendees be willing to walk up to 3/4 a mile to see an event? If these agreements do not happen, this project does not come close to parking code requirements. (Ohagan_053)
Chapter 22: Response to Public Comments

Response 11-183: With respect to the use of the North, South, and East Lots, as noted in the response to Comment 11-182, there would be a shared parking agreement among NYAP, the FOB, and NYRA regarding the use of these lots.

With respect to walking distances to parking facilities, as noted in the response to Comment 11-175, a comprehensive shuttle bus system provided by NYAP would be in place to serve patrons parking in the North, South, and East Lots so that they would not need to walk to the arena.

Comment 11-184: The North Lot will bring lots of noise and traffic to the West End of Floral Park. If a parking lot is set up here with access through the neighborhood both will be a thing of the past.

Use of the North and East Lots for parking has the potential to impact the athletic fields, schools and residences adjacent to these sites with increased vehicular traffic and noise.

One significant concern from the public forum is the obvious reliance upon the current parking facilities at Belmont Park which are located adjacent to our Floral Park Bellerose Elementary School as well as the Floral Park Memorial High School. Parking next to these schools is unacceptable. Having a parking lot near a school will compromise safety to residents and children. (Brush_130, McEnery_2392, Mezzetti_100, Ra_2571, Viscovich_096)

Response 11-184: As described in Chapter 11, “Transportation,” the entrances to Belmont Park at Plainfield Avenue (Gate 8) and Mayfair Avenue (Gate 9) are not proposed for vehicular or pedestrian site access to the Proposed Project. Vehicles and pedestrians would be prohibited from using these gates for site access. Vehicular access to the North Lot would be limited to Exit 26D on the Cross Island Parkway and vehicular access to the East Lot would be limited to the site entrance at Gate 5 Road. As discussed in the response to Comment 11-178, pedestrian access at the Mayfair Avenue Gate would be prohibited during arena events to prevent arena patrons from parking in the West End of Floral Park and walking into the North Lot to catch a shuttle bus to the arena.

With respect to concerns over the proximity of the parking in the North and East Lots to residences and schools, please also see the responses to Comments 1-56 and 1-108.

Comment 11-185: The disposition of the current 6,600 to 7,200 car dealership vehicles is not mentioned in the DEIS and needs to be addressed. (EAM_2563, Schneider_TS1_849)
Response 11-185: As detailed in Chapter 7, “Socioeconomic Conditions,” it is anticipated that the vehicles stored for auto dealerships would be relocated to a site outside of the study area; the location of this site is not known at this time.

Comment 11-186: At the hotel, the number of parking spaces, currently set at just 400, needs to be greatly increased to be more reflective of the amount being contemplated at the Milleridge Inn property, also in Nassau County. (McEnery_2392)

Response 11-186: As shown in Tables 11-39 through 11-43 of the EIS, the 400 parking spaces within and below the hotel’s podium is more than sufficient to accommodate the peak parking demand at the proposed hotel.

Comment 11-187: Parking guidelines are not fully compatible with typical design of parking spaces and garage ramps. The parking site plans for the proposed parking at Sites A or B are not provided. Additionally, they do not address ADA requirements outside of ADA-compliant curb ramps.

The document does not include plans to review for parking, rideshare curbside storage, pedestrian connections, etc. The figures are at too large a scale to be meaningful for site review. (EAM_2563)

Response 11-187: All Proposed Project components would adhere to ADA requirements and the New York State building code. Detailed site plans are typically not included in an EIS. The Proposed Project site plan provided in Figure 11-6 is provided for illustrative purposes only. The TMP, a draft copy of which is included in Appendix J of the FEIS, includes an operations plan that shows more details of the layout and operation of the parking facilities, rideshare drop-off and pick-up locations, and pedestrian connections.

Comment 11-188: There is no mention of the number of parking spaces required for each of the proposed land uses in the DEIS. There should be a complete analysis of the parking criteria used. (EAM_2563)

Response 11-188: The Proposed Project utilizes a shared parking supply in which the demand from the project components would share: the parking spaces provided on Sites A and B; and through a shared parking agreement among NYAP, the FOB, and NYRA, the parking spaces on the North, South, and East Lots during times of arena events or peak retail demand. Please also see the responses to Comments 11-170, 11-171, and 11-182.

Comment 11-189: The DEIS in Table 11-42 fails to consider a possible peak period at 1:00 PM. They analyzed the parking demand given a hockey game starting at 7:00 PM; however, based on the New York Islanders hockey schedule, Saturday games frequently start at 1:00 PM. If this is the case, this would increase parking demand at Belmont at 1:00 PM to 8,516 spaces when
only 8,252 are provided. This means that their parking lots would not be efficient to address the site generated parking if there was a hockey game at 1:00 PM. (EAM_2563)

Response 11-189: As noted in Chapter 11, "Transportation," Saturday afternoon hockey games do not happen on a regular basis. In their last nine seasons played at Nassau Coliseum, the New York Islanders averaged fewer than two Saturday matinee games per season. For this reason, a Disney on Ice show was selected as the representative analysis scenario for a weekend afternoon event, which includes live racing at Belmont Park. Belmont Park’s Fall Meet, which runs from mid-September through the end of October, would only overlap with pre-season hockey games (which have much lower levels of attendance compared to regular season games) and one month of the hockey regular season. Belmont Park’s Spring Meet, which runs from late April through mid-July, would only overlap with potential Stanley Cup playoff games. NYAP and NYRA would work to avoid the scheduling of a sold-out hockey game on a Saturday afternoon with live racing.

Between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which along with the demand management strategies in the TMP would result in a major reduction in vehicular traffic volumes and parking demand that had been projected in the DEIS. With these measures in place, there would be a sufficient number of parking spaces on the Project Sites and the North, South, and East Lots to accommodate the parking demand generated by the Proposed Project for a sold-out hockey game on a Saturday starting at 1:00 PM, 3:00 PM, or 5:00 PM without live racing at Belmont Park.

Comment 11-190: The approximate walking distances to get to the retail at Site A and Site B from the North and East Lots range from 2,750 feet to 4,750 feet. Parking designers usually call for maximum walking distances between 300 and 600 feet for retail customers and between 1,200 and 1,500 feet for employee parking. The walking distances to each of the retail sites from both the North and East Lots far exceed the maximum walking distances. If there aren’t a sufficient number of shuttle buses running, and retail customers or retail employees need to get to the retail sites from the North or East Lots, these people will have to walk these excessive distances.

It would take people approximately 10-20 minutes to walk from these lots to get to the retail sites. A shuttle to the retail sites is essential if people are expected to shop. The number of shuttles needed was not discussed but is necessary if they expect people to be using them as the main source
of internal transportation. Will a sufficient number of shuttles be provided? How often will the shuttles run? (EAM_2563)

Response 11-190: As noted in the response to Comment 11-175, a comprehensive shuttle bus system provided by NYAP would be in place to serve patrons parking in the North, South, and East Lots so that they would not need to walk to the arena. These shuttle buses would also be used by shoppers parking in the South and East Lots to the retail village so they would not need to walk. The TMP, a draft copy of which is included in Appendix J of the FEIS, includes an operations plan that provides further details about the shuttle bus route that would operate between the retail village and South and East Lots. The parking spaces in the South and East Lots would only be needed to accommodate parking demand from the retail village during peak midday shopping periods, when the demand would exceed the supply of 1,500 parking spaces beneath the retail village.

Comment 11-191: Please provide the hourly parking utilization survey of the existing parking facilities. (NYCDOT_2562)

Response 11-191: Hour-by-hour parking utilization information is not available. Parking utilization surveys were conducted during the weekday midday and Saturday midday time periods on a day with live racing at Belmont Park.

Comment 11-192: Please identify whether the number of proposed on-site parking spaces will be adequate for a 19,000 attendee event. (NYCDOT_2562)

Response 11-192: Table 11-44 in the EIS indicates that there would be adequate on-site parking spaces to accommodate a sold-out concert with 19,000 attendees on both a weeknight and a Saturday night.

Comment 11-193: The DEIS fails to mention if there are any parking restrictions within and below the hotel’s podium parking at Site A. Are there hotel parking restrictions limiting use to hotel guests only? The DEIS fails to mention if there are any parking restrictions at the proposed parking lot beneath the retail village at Site B. Are there certain time restrictions for the retail village parking? Are arena patrons permitted to park beneath the retail village? (EAM_2563)

Response 11-193: The parking availability and pay structure is described in the “Parking Facilities” section in Chapter 11 of the EIS. There would be no time restrictions for using the new parking beneath the retail village during business hours; shoppers at the retail village would not be charged a parking fee and would receive validation based on purchases.

Comment 11-194: There are 18,000 seats available for a hockey game. If there is an Average Vehicle Occupancy of 2.75 people per vehicle (as used in the DEIS for a
Chapter 22: Response to Public Comments

hockey game), then parking for 6,545 vehicles is required for attendees at the arena alone (18,000/2.75=6,545), assuming a sold-out game. If you take into account Belmont Park racing, 2,000 vehicles could be attending which results in 8,545 parking spaces that must be available. This exceeds the stated available 8,252 parking spaces without including the shopping center, hotel or office building parking spaces that will be required for these uses. (EAM_2563)

Response 11-194: The commenter’s assertion is incorrect; it is based on an assumption that all arena patrons would drive to the arena. Table 11-44 in the EIS demonstrates that the maximum parking demand generated by the Proposed Project with a weeknight or Saturday night sold-out hockey game at the arena could be accommodated by the parking provided on the Project Sites and the North, South, and East Lots.

Comment 11-195: In the parking analysis, the peak arena parking demand drops by 1,200 vehicles in an hour when the game is still being played. No reason is given for this. (EAM_2563)

Response 11-195: The reduction in parking demand prior to the end of the game reflects that a portion of patrons that are expected to depart the game early in order to beat the post-game peak period rush. Using the weekday with a hockey game starting at 7:30 PM as an example and with a typical game duration of two and half hours, the game would typically finish at 10:00 PM. A portion (based on arrival/departure data from comparable event venues, 25 percent) of arena patrons were assumed to depart during the 9:00 PM to 10:00 PM hour before the game finishes. The vast majority (remaining 75 percent) of arena patrons would depart after the game finishes during the 10:00 PM to 11:00 PM hour.

Comment 11-196: Will the cost of on-site parking be a prohibitive factor of utilizing on-site parking? Will it be deemed less time consuming for patrons to park on the local streets and walk than it would be to park in the outer lots and wait in line to take the shuttle? Cost should not be a prohibitive factor in deterring arena attendees from parking on-site. If anything, attendees will be encouraged, via parking and other incentives, to carpool and utilize enhanced public transportation options. The Mayfair gate will be closed so that anybody choosing to park in Floral Park will not be able to walk into the Project Sites via that route; alternative walking routes to the entry at Locustwood Road/Gate 5 is far too excessive a walk to be considered. (Curran_2564)

Response 11-196: It has not been determined what the pricing structure for arena events would be but, as noted, by the commenter, carpooling would be incentivized. And, with the introduction of the new LIRR Elmont Station on the Main Line, there would be more attractive options to arena-goers
than parking on remote residential streets and walking substantial
distances to enter at the intersection of Hempstead Turnpike and Gate 5
Road/Locustwood Boulevard. The TMP, a draft copy of which is
included in Appendix J, includes an operations plan that provides further
details about regarding internal shuttle buses serving the parking lots.

Comment 11-197: The DEIS needs to be more specific about current and future parking
within the Belmont Park campus. According to facility details provided
by NYRA, Belmont Park Racetrack contains 91 acres of parking areas
that can accommodate 18,500 cars. If each acre of parking can
accommodate over 200 parking spots, eliminating 28 acres of parking to
the south of Hempstead Turnpike and 15 acres to the north means that 43
acres of potential parking will be eliminated. It needs to address the
elimination of the 43 acres of potential parking, which would result in a
deficit of 8,741 parking spaces. The NYAP plan is to replace that with
less than 2,000 parking spaces (McEnery_2343)

Response 11-197: The EIS identifies the number of parking spaces provided on the Project
Sites and the North, South, and East Lots for existing conditions and the
future With Action condition. Table 11-38 of the FEIS shows that the
Proposed Project would result in a net reduction of 1,965 parking spaces,
not the deficit of 8,741 spaces cited by the commenter. As noted in the
response to Comment 11-171, the amount of parking being provided on
the Project Sites and the North, South, and East Lots would be sufficient
to accommodate the Proposed Project’s needs. With regards to parking
on Belmont Stakes day, please see the response to Comment 11-176.

VEHICULAR AND PEDESTRIAN SAFETY

Comment 11-198: If you ride east down Hempstead Turnpike towards Plainfield Avenue, in
the center lane they’re encouraging U-turns because you can’t turn left
into the fence of Belmont Park.

If you go on Hempstead Turnpike, there are arrows on the ground that go
into the fences of the racetrack. Didn’t anybody look that it says a turn
into the fence? (Amato_TS3_935, Gullo_TS3_939)

Response 11-198: Portions of the center lane on Hempstead Turnpike between the
intersections of Gate 5 Road/Locustwood Boulevard and Plainfield
Avenue are configured as a two-way, left turn lane. The signage and
striping of Hempstead Turnpike fall under the jurisdiction of NYSDOT.

Comment 11-199: Concerned about safety with increased local traffic and speeding cars.

Several intersections along Plainfield Avenue are unsignalized with stop
signs. Who will police these intersections? Under current conditions,
many drivers do not stop at these stop signs and run through them. How
will this type of driving behavior be regulated to ensure public safety along the residential corridor?

The Plainfield Avenue intersection at Tulip Avenue does not have turning lanes and already is very congested. How will this intersection be policed and how will public safety be ensured?

Concerned about safety, especially hit and runs. (Chatterton_TS2_903, Chiara_TLS3_960, Culotta_2365, King_TLS2_914)

Response 11-199: Speeding, running through stop signs, and hit and runs are all examples of illegal activities that occur today within countless communities and fall under local police jurisdiction. With the implementation of the monitoring plan component of the TMP described in Chapter 17, “Mitigation,” particularly sensitive local residential streets such as Plainfield Avenue could be monitored on event and non-event days, and the stakeholders—which would include transportation agencies, police, fire and other emergency responders, and local municipalities along with NYAP’s full-time transportation manager—can take actions to help remedy such illegal activities with upgraded traffic engineering/safety measures and upgraded enforcement measures.

Comment 11-200: Concerned gate access to the Proposed Project will bring traffic that our children must have to deal with along with transient people coming through from the Bellerose train station, both compromising their safety. (Mezzetti_100)

Response 11-200: As noted in the response to Comment 11-184, the Mayfair Avenue Gate would be closed to vehicles and pedestrians during arena events. Additionally, as noted in the response to Comment 11-120, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties. Therefore, it is not anticipated that arena patrons would use the Bellerose Station when traveling to or from the Project Sites and walk from that station to the Project Site.

Comment 11-201: Concerned about children crossing Plainfield Avenue with increased traffic volumes. Concerned about safety of school children traveling by foot, car, or bus with potential increased accidents.

The majority of students walk to school in Floral Park, and more cars on the road will lead to more car and pedestrian accidents.

Concerned about traffic safety particularly for pedestrians and bicyclists, and safety of community residents. (Alexander_TLS1_887, Corrigan_054, Coven_2230, FPBPTA_2226, Ferone_TLS1_852, Labissiere_TLS4_1006,
Response 11-201: As shown in Table 11-18 of the EIS, crash data obtained from NYSDOT over the three year period from March 1, 2015 to February 28, 2018, showed that the worst residential street intersection along Plainfield Avenue south of Jericho Turnpike and north of Hempstead Turnpike, was characterized by, on average, about one personal injury accident per year, and less than one pedestrian or bicycle accident per year. Although nobody claims that any personal injury accident or pedestrian or bicycle accident is acceptable, the amount of additional traffic expected to use Plainfield Avenue is not substantial—approximately 30 vehicles per hour (vph) to 85 vph during weekday AM and PM peak hours—and is not expected to increase the number of those accidents.

Comment 11-202: The increased size of the Belmont Redevelopment Project also poses significant adverse traffic issues to our schools and community. With regard to traffic and safety, there are 4 schools within the boundaries of Floral Park Village. Two of them are on Plainfield Avenue, the street that borders the east side of Belmont Park and one which is sure to see a significant increase in traffic in response to the proposed overdevelopment at the site. (FPBPTA_2226)

Response 11-202: Chapter 11, “Transportation,” includes an evaluation of the effects of the Proposed Project on walking routes to schools that involve crossing of Plainfield Avenue and states that the Proposed Project is estimated to result in two-way traffic volume increases of approximately 28 vph to 54 vph during school arrival and dismissal times. This is approximately one additional vehicle every one to two minutes and is not considered an excessive increase.

Comment 11-203: I cannot support the traffic this project will bring behind our grammar school and our adjacent high school endangering our young people. (Cunningham_TS4_989)

Response 11-203: Comment noted.

Comment 11-204: Concerned about the safety of the children. We’d like to take you on a tour. Show you Belmont through our school yard. Take you on a bus tour at dismissal so you can experience the traffic that our bus drivers are already facing every day. (Cunningham_TS4_989)

Response 11-204: Based on public comments and Floral Park-Bellerose School Board of Education request, ESD on March 15, 2019 had a site walk of the North Lot/Floral Park-Bellerose School District athletic fields with Floral Park
Chapter 22: Response to Public Comments

Village and School District representatives to review potential issues and mitigation measures associated with the Proposed Project.

**Comment 11-205:** This area is extremely close to an elementary school, it is imperative that mall traffic be kept at the mall and out of their yards and away from the children walking home from school. (Milazzo_2203)

**Response 11-205:** The retail village is not located in close proximity to a school. As described in Chapter 11, vehicular entrances to Site B would be limited to entrances on Hempstead Turnpike and the Cross Island Parkway. All of the parking demand generated by the Proposed Project could be accommodated on site.

**Comment 11-206:** Recommends looking at traffic before there is another death, as there have been accidents on Dutch Broadway and Elmont Road involving students. Several student deaths have happened on Elmont Road. We are concerned with the safety on the roads. (Friederich_TS1_877, Schlechter_TS3_943)

**Response 11-206:** ESD and their consultants met with NCDPW and understand that it has commenced work on traffic safety studies for the Dutch Broadway and Elmont Road area.

**Comment 11-207:** The Draft Environmental Impact Study concedes that a number of intersections will be adversely affected by the proposed project (i.e. Plainfield Avenue/Tulip Avenue, Plainfield Avenue/Jericho Turnpike). This is of grave concern to us. Many of our parishioners walk to church and many students walk to school. Those who park in our church parking lot must cross Plainfield Avenue to get to the church and school. Their safety is of paramount concern to us. (Fusco_OLV_2399)

**Response 11-207:** Impacts at both of the intersections cited can be mitigated via signal timing modifications, as noted in Chapter 17, “Mitigation,” of the EIS. As noted in the response to Comment 11-89, the volume of traffic estimated to be generated by the Proposed Project during the five peak traffic hours analyzed along northbound Plainfield Avenue is about 5 to 20 vph during the weekday AM, weekday PM, and Saturday PM peak hours, and 45 to 85 vph during the Saturday midday and Saturday night peak hours. Southbound Plainfield Avenue volumes would increase by about 5 vph to 25 vph during the weekday AM, Saturday midday, and Saturday night peak hours, and 55 vph to 80 vph during the weekday PM and Saturday PM peak hours. These volumes result in an increase of approximately only one car per minute, which is not significant.

**Comment 11-208:** ESD conducted a crash analysis within the project area, but it is not clear what type of crash analysis was conducted and what radius it used. ESD
should conduct a broader crash analysis which includes the local street network, especially within the Village of Floral Park. (Culotta_2365, Culotta_2572)

Response 11-208: As described in Chapter 11, “Transportation,” crash data for the three-year period from March 1, 2015 to February 28, 2018 were tabulated for a 2.2-mile segment of Hempstead Turnpike from the Cross Island Parkway to Covert Avenue/Meacham Avenue and at 12 intersections along Jericho Turnpike and Plainfield Avenue within the study area for the local street network, summarizing the intersection crash data by accident severity and by accident type. Findings of the analysis, including those for several intersections in Floral Park, were presented in Chapter 11. Accident rates and collision diagrams were developed and are presented in Appendix F.

Comment 11-209: The DEIS on page 11-17 states “where appropriate, measures to improve traffic and pedestrian safety are identified and reflect consultation with the NYCDOT.” Please clarify which measures NYCDOT was consulted. (NYCDOT_2562)

Response 11-209: The FEIS has been updated to reflect this comment and as well as the new neckdown that has been installed to extend the sidewalk at the southeast corner of the intersection of Hempstead Avenue and Springfield Boulevard, which has reduced the crossing distance for pedestrians.

Comment 11-210: Since the two major developments of the project are on opposite sides of Hempstead Turnpike, we expect that pedestrians should be able to safely cross Hempstead Turnpike. The DEIS on page 11-91, however, illustrates that there is no final decision yet as to how to get pedestrians safely across this busy road from Site A to Site B. The DEIS states that there are options they are currently considering, such as a new pedestrian bridge above Hempstead Turnpike, and improved pedestrian/vehicular underpass below Hempstead Turnpike, and/or an improved pedestrian-only tunnel under Hempstead Turnpike. It is concerning that there is no set plan in place yet. (EAM_2563)

Response 11-210: At this time, there are one or more grade-separated pedestrian crossings still under consideration; the EIS analyses consider the potential effects of utilizing any of the possible options.

Comment 11-211: The accident history analysis shows a number of the locations that were analyzed have from 2 to 8 times the accident rate per million vehicle miles and million entering vehicles, above the statewide averages for similar types of roadways. This is an already dangerous condition which will only be exacerbated by the increased volumes estimated to be added to
the highway network. These conditions indeed must be addressed in the DEIS, and mitigated, but are not.

Auto accidents will increase due to the number of additional cars on the road.

The DEIS states that although the Proposed Project would result in an increase in traffic volumes, it is not anticipated that the project-generated traffic volumes would influence the rate of accident occurrence. There is no justification for this conclusion. It is not reasonable to add hundreds/thousands of cars to an intersection and say the accident patterns are not expected to significantly change. (EAM_2563, Ferone_TS2_926, Gayron_TS4_991, Jacob_TS3_954)

**Response 11-211:** The EIS does not state that the number of accidents would not increase—it states that it is not anticipated that the project-generated traffic volumes would unduly influence the rate of accident occurrence. As noted in the EIS, close to 90 percent of the Project-generated traffic would use the Cross Island Parkway, not local streets. Within Nassau County, the highest concentration of Project-generated vehicle trips would occur on the segment of Hempstead Turnpike between the Cross Island Parkway and the intersection of Locustwood Boulevard/Gate 5 Road, which has a raised center median and no curbside parking. The study area intersections located to the east of the Project Sites along Hempstead Turnpike, Plainfield Avenue, and Jericho Turnpike would experience much lower levels of Project-generated traffic, not on the order of magnitude of the hundreds or thousands as described by the commenter. The accident rate comparisons provided in Table 11-19 of the EIS indicate that the locations that have the highest accident rates compared to the statewide averages are all located on Jericho Turnpike, which would have lower increases in project-generated trips given their distance from the Project Sites.

**TRAFFIC DIVERSIONS**

**Comment 11-212:** Concerned that people will get off the Cross Island Parkway and use local roads, and that navigation apps will direct them to local roads.

Traffic apps will send hundreds of extra cars through residential streets. The DEIS traffic study does not account for this in good faith.

Navigation apps will send visitors on local side streets.

Google Maps will direct cars right through Floral Park to get to Belmont. Traffic apps already send cars on alternative local routes to access the racetrack.
Overflow traffic from the already congested Cross Island Parkway, that will likely snake through local streets (as guided by various navigational apps like WAZE), is also sure to lead to more accidents in our community.

Apps already reroute from CIP to local streets during congestion, anticipate they will do so more with the Project. People won’t come to the Project if traffic is bad. (Browne_TS1_853, Coven_2230, Culotta_2572, Dobson_TS2_916, FPBPTA_2226, King_TS2_914, Madden_TS3_956, Martinez_TS2_896, Nicolello_TS2_925, Palamar_2240, Pfeiffer_TS2_899, Roleke_TS4_1018, Wagner-Tyson_TS2_918)

Response 11-212: Between publication of the DEIS and the completion of this FEIS, a major emphasis of the traffic studies has been on limiting auto diversions off of the Cross Island Parkway onto local streets, especially residential streets. The LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line and the TMP, which has been further developed, refined, and quantitatively evaluated. The TMP includes demand management strategies aimed at reducing peak hour auto trips generated by the arena and reducing unmet traffic demand along the Cross Island Parkway, the projected effects of which are detailed in Chapter 17, “Mitigation,” and Appendix J. The new LIRR Elmont Station and the demand management strategies in the TMP is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets.

One of the elements of the TMP is to partner with Waze and possibly other mobile navigation app providers to designate sensitive local residential streets such as Plainfield Avenue as “closed” and “unavailable” to traffic that might otherwise divert to it to get to the arena during pre-event and post-event peak hours. Plainfield Avenue would not need to be physically closed, and could still be used by local residents or by those who know of its availability, but not by those who would otherwise rely on Waze for route advice.

Comment 11-213: Even though the DEIS conclusions and mitigation plan acknowledge that traffic congestion along the CIP cannot support the inordinate traffic demand—which will result in drivers using mobile navigation apps rerouting people to local streets—the DEIS fails to expand the study area to examine the impact of the project on local communities. Prior to writing the DEIS, the Village of Floral Park requested a broader study area. (Gunther_2344)
Chapter 22: Response to Public Comments

Response 11-213: As mentioned in the response to Comment 11-212, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line and a comprehensive TMP has been developed to implement demand management strategies that would reduce the reliance on private auto use by arena patrons. The new LIRR Elmont Station and the demand management strategies in the TMP are key measures to maximize mass transit usage to the Project Sites, reduce traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets. Thus, there has been no need to expand the traffic study area. As part of the TMP, a group of stakeholders would be formed of representatives from transportation agencies, emergency responders and the local fire and police departments, and the local municipalities plus NYAP’s full-time transportation manager, to monitor transportation conditions and take proactive measures where necessary to address issues should they arise.

Comment 11-214: ESD fails to consider technology, such as Google Maps and Waze apps, that have the potential to route nearly 40,000 drivers per day on game days through local side streets to travel to and from the project site. (Culotta_2365)

Response 11-214: The statement that the Proposed Project could have a potential to generate nearly 40,000 drivers per day on a game day is inaccurate. The parking accumulation tables provided in Appendix F of the DEIS show that the Proposed Project would generate a maximum of approximately 28,200 total auto trips (translating to 14,100 drivers) on a weekday with a sold-out concert (19,000 attendees) and a maximum of approximately 32,200 total auto trips (16,100 drivers) on a Saturday with three sold-out Disney on Ice shows (each having 11,500 patrons). The vast majority of project-generated auto trips would be expected to use the Cross Island Parkway to travel to and from the Project Sites and would not use local side streets. Please also see response to Comment 11-212.

Comment 11-215: Revise traffic analysis to account for County and local roads to the east, south, and southeast, as they are the most likely to be used by traffic redirected from the Southern State and Cross Island Parkways due to already existing poor levels of service along the Cross Island Parkway, and live traffic navigation applications. (Curran_2564)

Response 11-215: The traffic analyses addressed locations identified as the most likely to receive a significant level of traffic expected to be generated by the Proposed Project. Other than the Cross Island Parkway, which is estimated to receive close to 90 percent of the traffic, Hempstead Turnpike is estimated to receive the next highest share. Therefore, 17 of
the 38 intersections included within the EIS traffic study area were along that corridor between the Project Sites and Covert Avenue/Meacham Avenue to the east. As noted in the response to Comment 11-17, it is anticipated that the majority of traffic originating from the south and southeast would approach the Project Sites by taking the westbound Southern State Parkway to the northbound Cross Island Parkway. The Proposed Project would be served by three interchanges on the Cross Island Parkway (Exit 26A, Exit 26B/C, and Exit 26D), two of which provide direct access to the parking facilities.

As mentioned in the response to Comment 11-212, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line and a comprehensive TMP has been developed to implement demand management strategies that would reduce the reliance on private auto use by arena patrons. As detailed in Chapter 17, “Mitigation,” and Appendix J, the projected effects of these measures would substantially eliminate or reduce unmet demand on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets.

Comment 11-216: Concern that DEIS states 90 percent of vehicle traffic will arrive via Cross Island Parkway and acknowledges that the Parkway does not have the capacity to handle additional traffic caused by the project. As no improvements are proposed for the Parkway, it is irrational to assume that some of this traffic will not be diverted to local roads which will suffer greater impacts. It is reasonable to expect that local roadways will be significantly adversely impacted from vehicles maneuvering and using navigation apps to try to avoid the traffic on these overflowing main roads. Those going to the site after a few times will know what local roads to take instead of the Cross Island Parkway. Traffic patterns which avoid congested major roadways would develop, causing the excess traffic to flow into and through secondary residential streets. The impacted local roads will include the residential streets entirely surrounding the Belmont Park area. The EIS must address these problems and mitigate them.

Our local streets will be decimated by frustrated drivers who must get off the CIP due to jammed traffic. Our streets will not be safe for our kids as drivers speed thorough the neighborhoods late for a game or concert.

Concern about increase in daily traffic headed for the destination will be rerouted through Bellerose Terrace, South Floral Park, and Elmont.

New buildings will attract drivers seeking shortcuts through local streets.

Concerned that local roads will be clogged with traffic overflows from the CIP.
The local streets of Floral Park are going to feel the stress of the increased traffic because the Cross Island Parkway cannot handle the influx of cars. Many of the vehicles will try to use local roads to get around and this will cause traffic jams. The Village of Floral Park will simply be unable to handle any of the diverted traffic.

Concerned about the additional traffic this project will bring to the area especially the spill over to local streets. They see no mitigation plan to manage the increased traffic flow.

Concern that traffic overflow from the CIP will impact local streets since DEIS states that portions of the CIP are already at capacity.

Since the Cross Island Parkway is the only highway servicing the site, it is common sense that people will cut through neighborhoods like Floral Park. This will cause traffic delays throughout the entire area. The Cross Island will be a parking lot.

*Response 11-216:* Project-generated traffic was assigned to the most direct and most logical routes from each trip origin to the Project Sites, which primarily was the Cross Island Parkway and, secondarily, Hempstead and Jericho Turnpikes. In order to avoid diverting traffic to local streets, an emphasis was placed on developing a comprehensive plan to encourage public transportation use and discourage private auto use. As a result, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line and ESD and NYAP have committed to a comprehensive TMP, the projected effects of which are detailed in Chapter 17, “Mitigation,” and Appendix J. The new LIRR Elmont Station and the demand management strategies in the TMP, is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimizing the potential for traffic diversions onto local streets. Please also see response to Comment 11-212.

*Comment 11-217:* Several intersections in the Bellerose area unquestionably will also be impacted but were not included in the DEIS. To avoid the Cross Island Parkway, recent technologies will divert traffic to such local roads as Commonwealth Boulevard, 249th Street, Little Neck Parkway, 266th Street, Plainfield Avenue intersection.
Concerned about the impact of traffic on Cambria Heights roads-Belt Parkway, Linden Boulevard, 115 Ave, and Cross Island service road between 109th Ave and Linden Boulevard. They are alternate routes used by motorists when there is congestion on the Cross Island Parkway, Southern State Parkway, and the Belt Parkway. These streets are currently heavily traveled during the morning and evening rush hours because the Cross Island Parkway, the Southern State Parkway, and the Belt Parkway have heavy traffic. With the exception of Linden Boulevard, each of the alternate routes are single lane roads that traverse residential areas. (English-Young_1052, Hellenbrecht_BCCA_052, Hellenbrecht_TS4_996)

Response 11-217: Local streets in the Bellerose and Cambria Heights areas are not expected to experience significant traffic diversions. Nevertheless, the draft TMP includes a monitoring plan that includes traffic data collection on local streets and could include locations such as those mentioned by the commenters. Please also see the responses to Comments 11-212 and 11-216.

Comment 11-218: The diversion analysis in the DEIS contemplates only two potential diversion routes for drivers seeking to avoid congestion on the CIP (one for vehicles heading north from the Southern State Parkway, and the other for vehicles traveling north/south on the western side of the project). The DEIS fails to acknowledge the potential for traffic diversions by westbound motorists coming from eastern Long Island on the Northern State Parkway (NSP) or the Long Island Expressway (LIE), despite the fact that majority of vehicle trips are projected to come from Long Island. During times of heavy congestion on the NSP, LIE and CIP, western bound traffic could easily look to avoid delays by exiting onto Jericho Turnpike, travelling through the Village of Floral Park onto Plainfield Avenue, and entering the project on Hempstead Turnpike via the Gate 5 entrance. The failure to even acknowledge this diversion is glaring. Because the DEIS fails to provide a reasonable allocation of project-related vehicle traffic on the local street network, the mitigation strategies for local streets, which largely consist of minor adjustments to the timing of traffic signal devises, are simply not credible. (VFP_2547)

Response 11-218: It is highly unlikely that motorists from eastern Long Island traveling westbound on the Northern State Parkway or Long Island Expressway would choose to exit onto Jericho Turnpike to travel to the Project Sites. If a motorist were to exit the Northern State Parkway near Westbury, head west along Jericho Turnpike, head south along Plainfield Avenue, and head west along Hempstead Turnpike to enter the project at the intersection of Locustwood Boulevard/Gate 5 Road, they would need to travel a distance of nearly seven miles along roadways with lower speed.
limits, encountering numerous traffic signals and stop signs, and along commercial corridors with on-street parking and site driveways.

As mentioned in the response to Comment 11-212, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line and the demand management strategies in the TMP is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets.

Comment 11-219: The proposed project could bring up to 50,000 new visitors to the site per day which today only sees 3,000 to 5,000 visitors during the racing season. The DEIS even says that most of the visitors (up to 85 percent) would arrive via the CIP and that it is already at or over capacity at peak periods which will overlap with events at the proposed arena. ESD acknowledged that the CIP is “a bit of a challenge” in terms of mitigation. It is inevitable that the local streets adjacent to the site can expect to absorb the significant overflow. The DEIS concludes without explanation or analysis, that the traffic for the proposed project will be contained to the CIP and promises to develop a traffic management plan in the future that will miraculously make these problems go away. (VFP_2548)

Response 11-219: It is estimated that, on average, the Proposed Project would attract approximately 10,000 to 15,000 visitors to the Project Sites on a daily basis. Moreover, it was identified that a total attendance of 45,000 daily visitors could only occur on 10 to 15 days over the course of the year when there would be multiple arena events (e.g., a day with three sold-out Disney on Ice shows each having an attendance of 11,500). See responses to Comments 11-216 and 1-58.

Comment 11-220: Given that every Cross Island Parkway segment in the SB direction for the Saturday Midday Hour (coinciding with departures for Disney on Ice, etc. at the arena) operates with LOS of D or worse (with the exception of the off ramps at Hempstead Avenue and Linden Boulevard and the on-ramp at Linden Boulevard); are we to fully expect all departures to the south to remain on the Cross Island Parkway the entire time? It is likely that patrons will choose an alternate route taking local roadways into account. (Curran_2564)

Response 11-220: The VISSIM analysis in Chapter 11 included analyses of two peak hours that included departures from an arena event (Saturday Midday for departures from a Disney on Ice event and Saturday night for departures from an Islanders game). A weekend post-event was not analyzed because Saturday is the most conservative scenario; background traffic volumes on area roadways are higher on Saturday nights compared to
weeknights. Although the results of the VISSIM analyses showed that segments of the southbound Cross Island Parkway would operate at LOS D or worse, there would neither be significant reductions in speeds nor significant issues with unmet demand (i.e., instances where vehicles leaving the event would not be able to enter the parkway). Highways can be designed for LOS D in a congested time period. Levels of service on a highway are a function of density. The southbound Cross Island Parkway would operate at speeds of 35 to 50 mph during these periods.

The most direct exit route from the project’s parking facilities is via the Cross Island Parkway, not via local streets. Once exiting traffic merges onto the Cross Island Parkway, it is approximately a two-mile trip until vehicles can further disperse onto east-west regional highways such as the Grand Central Parkway, Southern State Parkway/Belt Parkway and or the major arterials, whereas the use of local routes would be circuitous and typically much longer, typically encountering traffic lights and stop signs.

**Comment 11-221:**

The Traffic Study, without explanation, claims that project-generating traffic will access the project site via the Cross Island Parkway rather than local streets even though the parkway is already at full capacity.

Floral Park Mayor Dominick Longobardi captured the basic problem in his comments to the DEIS: “The increase in daily traffic will be re-routed through [local communities] as the lack of infrastructure improvements only causes drivers to explore other options.” The DEIS’s unreasonable and unsubstantiated projections for local project-related traffic do not provide an accurate assessment of the project’s traffic impacts on the local street network. As a result, the DEIS cannot, in its present form, provide the basis for determining reasoned mitigation measures.

In its assessment of the DEIS, NV5 explains: Based on the limited information provided in the DEIS, it appears that only 3 to 5 percent of the total site traffic are anticipated to utilize local roadways, 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.

NV5 further explains: To emphasize how little traffic the DEIS assigns to the local roadway network, NV5 reviewed the trip estimates for taxi/rideshare trips. As per Table 11-5, during the evening peak hour, 276 total taxi/rideshare trips are projected (138 in and 138 out). According to Figure 32A, a total of 212 vehicles access the site from local streets (157 vehicles in and 55 vehicles out). Based on this information, more taxi/rideshare trips access the site than all local trips during the evening.
peak hour. This is unrealistic; especially since most taxi/rideshare trips will come from local destinations, such as last mile connections from local train stations. (VFP_2547)

**Response 11-221:** As mentioned in the response to Comment 11-212, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line and a comprehensive TMP has been developed to implement demand management strategies that would reduce the reliance on private auto use by arena patrons. The new LIRR Elmont Station and the demand management strategies in the TMP is a major action towards maximizing mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets. Regarding the use of taxis or rideshare vehicles as last mile connections from local train stations, please see the response to Comment 11-78.

**SITE ACCESS AND EGRESS**

**Comment 11-222:** Would like a promise from the developers that 107th Avenue between 225th and 227th Streets does not become an exit for the parking lot. (Labissiere_TS4_1006)

**Response 11-222:** 107th Avenue in Queens would not be utilized as an entrance or an exit to the Proposed Project.

**Comment 11-223:** If the North Lot is to be reactivated, it would be important to consider the rehabilitation of the Cross Island Parkway access ramp. (Bosworth_2100)

**Response 11-223:** The ramps serving the North Lot at Exit 26D on the Cross Island Parkway are active during the Spring and Fall racing meets at Belmont Park. Rehabilitation of these access ramps is not necessary.

**Comment 11-224:** ESD should funnel all post-event traffic into the Cross Island Parkway and ESD should expand the ramps leading to and exiting the Cross Island Parkway) (Culotta_2365)

**Response 11-224:** The vast majority of post-event traffic is expected to use the Cross Island Parkway, but only a modest amount of traffic is expected to use Locustwood Boulevard/Gate 5 Road to exit to Hempstead Avenue/Turnpike. In the Saturday Midday and Saturday night peak hours, which included departures from a Disney on Ice show and a hockey game respectively, only 25 to 30 percent of the total outbound traffic would exit the Project Sites at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road.
Comment 11-225: Will the emergency vehicle access point to Site B have security posted there, and be locked if there is no emergency? I don’t want shoppers to use that entry point to access the retail space as they will create congestion and dangerous situations in a residential area. (McGruder_2150)

Response 11-225: Access to the Site B entrance at the west end of 109th Avenue would be restricted to emergency vehicles only.

Comment 11-226: To date, the Plainfield Avenue gate is not slotted to be an active gate. The school district needs assurance in writing that this gate will remain closed for daily public use, tours, buses, or shuttles.

Concerned that Mayfair Avenue gate will be open and children’s safety will be impacted.

Concerned that plans to keep the Mayfair Avenue entrance closed will not be kept.

We need written commitments regarding Plainfield Avenue and Mayfair Avenue gates.

Concerned that entrances to Belmont Park at Plainfield Avenue and Mayfair Avenue could open.

What assurances are there that Plainfield Ave Gate and Belmont Park Road will not be used for through access? (Cheng_TS1_881, Ferone_TS1_852, Ferone_TS2_926, Gunther_TS3_938, Mesnick_2237, VFP_2548, Weickert_TS2_900)

Response 11-226: As described in the response to Comment 11-184, vehicles and pedestrians would be prohibited from using the entrances to Belmont Park at Plainfield Avenue (Gate 8) and Mayfair Avenue (Gate 9) for site access. These prohibitions would be memorialized as part of the MEC.

Comment 11-227: As a resident of the West End of Floral Park, very near the Mayfair Avenue gate, I am very concerned about people parking on our streets and walking through the gates and/or jumping over the fence. Our quiet neighborhood will be overrun with people and tailgaters.

Without a full-time station with direct access from both directions, many people will drive to Hempstead or Garden City, jump on the train, get off at Bellerose, walk through the neighborhood streets of Floral Park, and enter the Mayfair Avenue gate or jump over the fence. This is a reality. I have seen it on Belmont Stakes day. (McNally_2552)

Response 11-227: As noted in the response to Comment 11-120, the LIRR would be constructing a new, full-time Elmont Station on the Main Line with direct access from both directions, and as noted in the response to Comment 11-226, the Mayfair Avenue Gate would be closed during times of arena
events. Therefore, there would be no situations in which LIRR riders would exit at the Bellerose Station, walk through Floral Park and try to enter the Project Sites at the Mayfair Avenue Gate. Instead, LIRR riders would disembark at the new Elmont Station, from which they would take a shuttle bus to the arena.

Comment 11-228: Regarding the statement “the entrances to Belmont Park at Plainfield Avenue and Mayfair Avenue are not proposed to be used for vehicular or pedestrian access”. How credible is this, when, after opening, the sheer volume of Belmont traffic will demand a relief valve onto Plainfield Avenue? Reviewing Chapter 17, it says the developer will defer resolution until an “after the fact” TMP finds a solution. (Gunther_2344)

Response 11-228: As described in the response to Comment 11-184, vehicles and pedestrians would be prohibited from using the entrances to Belmont Park at Plainfield Avenue (Gate 8) and Mayfair Avenue (Gate 9) for site access and this would be memorialized in the MEC. As described in the response to Comment 11-54, between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line. ESD, NYAP and their consultants have developed a comprehensive TMP to increase the use of public transportation and reduce reliance on auto use. Please refer to Chapter 17, “Mitigation,” for additional information and Appendix J for a draft copy of the TMP.

Comment 11-229: Concerned about the entrances and exits to the Site B retail space. I do not want the entrances and/or exits to the retail space to be into the residential areas of Elmont via 106th, 109th and Hathaway Avenue onto Wellington Road. We, as residents, already have to deal with the cars from the car dealers at Belmont racing up and down Heathcote Road to and from the gas station. Our children and cars are put at risk, and if these roads are open to shoppers to travel and access the retail space it will be even more dangerous for our children and us to maneuver our blocks right outside of our doorways. Entrances and exits to the Site B retail space should ONLY be from the Cross Island Parkway and Hempstead Turnpike. (McGruder_2146)

Response 11-229: Vehicular access to the Project Sites and the associated parking facilities would be provided via two entrances on Hempstead Turnpike (Gates 5 and 14) and three interchanges on the Cross Island Parkway (Exits 26A, 26B/C and 26D). Vehicular access to the Project Sites would not be available from 106th Avenue or Hathaway Avenue. There would be a restricted-access entrance for emergency vehicles only located and the west end of 109th Avenue. Therefore, there would not be any access to the Project Sites from 106th, 109th, and Hathaway Avenues.
Comment 11-230: Having 2,800 cars exiting the North Lot onto the Cross Island Parkway will cause major congestion, delays and potentially be the cause of accidents as drivers try to merge onto the parkway.

Access to and from the East Lot and the South Lot from Hempstead Turnpike for a possible 3,400 cars will be a traffic nightmare. Tilles Center in Greenvale has the local police close Northern Boulevard in both directions to let cars exit an event. Closing Hempstead Turnpike to let these cars exit is impractical. Traffic lights will only allow so many cars to exit resulting in long delays. (Gribbins_2070)

Response 11-230: Between publication of the DEIS and the completion of this FEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line and a comprehensive TMP has been developed to implement demand management strategies that would reduce the reliance on private auto use by arena patrons. The assessment of traffic conditions in Chapter 17, “Mitigation,” accounts for these mitigation measures.

With the new LIRR Elmont Station and implementation of the demand management strategies in the TMP, the traffic volume figures show that the Proposed Project would generate a net increase of 1,527 and 1,035 vehicles entering the Cross Island Parkway at Interchange 26D from the North Lot during the Saturday Midday and Saturday night peak hours, respectively, which include the departure of arena patrons from a sold-out Disney on Ice show and a sold-out hockey game. This represents decreases of 206 and 851, respectively, in vehicles exiting the North Lot as compared to what was projected in the DEIS. These vehicles would be distributed amongst two on-ramps providing access to the northbound and southbound directions of the parkway. Traffic conditions along the Cross Island Parkway were assessed using a VISSIM micro-simulation model, the results of which showed that with the exception of the northbound on-ramp during the Saturday Midday peak hour, these ramps would not back up during when vehicles are exiting the North Lot during these time periods. The analysis of departures for a Disney on Ice show during the Saturday Midday peak hour did not assume implementation of demand management strategies for arena patrons, such as the shuttle bus service to/from the LIRR’s Rockville Centre Station, the Downtown Jamaica area, and park-and-ride facilities, which would reduce the queuing of vehicles exiting the North Lot. Other potential strategies to facilitate the flow of traffic merging onto the Cross Island Parkway after arena events are discussed in the Operations Plan of the draft TMP, which is included in Appendix J of the FEIS.

With the new LIRR Elmont Station and implementation of the demand management strategies in the TMP, the Proposed Project would generate
Chapter 22: Response to Public Comments

a net increase of 816 and 745 vehicles exiting the South and East Lots at the intersection of Hempstead Turnpike and Locustwood Boulevard/Gate 5 Road during the Saturday Midday and Saturday night peak hours, respectively. This represents decreases of 72 and 560, respectively, in vehicles exiting the South and East Lots at this intersection as compared to what was projected in the DEIS. The analyses provided in Chapter 17, “Mitigation,” show that the impacts identified at this intersection during these time periods would be fully mitigated without requiring the closure of Hempstead Turnpike.

Comment 11-231: Multiple entrance and exit ramps will be needed to handle the heavy volume of vehicles using the Cross Island Parkway. (Bayat_2105)

Response 11-231: Vehicular access to the Project Sites and the associated parking facilities would be provided via three interchanges on the Cross Island Parkway (Exits 26A, 26B/C, and 26D).

Comment 11-232: There needs to be proper parking and egress to the parking as to not cause backups onto the Cross Island Parkway.

As long as the parking garages are well designed and they allow easy access on and off the Cross Island Parkway, I do not believe the traffic issue should prevent the project from moving forward. (Goldman_2274, Williams_107)

Response 11-232: As discussed in Chapter 11, “Transportation,” the parking supply of the Project Sites and the North, South, and East Lots would accommodate the maximum parking demand generated by the Proposed Project and the maximum combined parking demand generated by the Proposed Project and live racing at Belmont Park. The Proposed Project would be served by three separate interchanges of the Cross Island Parkway. To optimize vehicle entry into the parking beneath the retail village and the South Lot and to minimize queuing from spilling back, vehicles would enter the parking facilities without waiting to collect a ticket. The toll booths for the North Lot would be situated at least a half mile from the exit ramps to minimize the potential for queues spilling back onto the parkway. The segments of the Cross Island Parkway adjacent to the Project Sites were assessed using a VISSIM micro-simulation model to replicate the influence that entrance and exit ramps serving the Proposed Project have on the parkway.

Comment 11-233: The DEIS on page 11-58 states “It is assumed that most arena patrons would purchase parking in advance (as part of full or partial season ticket plans or online when purchasing event tickets) and would be directed to the entrance of the parking facility where they reserved a space based on driving directions provided with the parking pass and/or guide signs on
the local street and highway networks to minimize unnecessary recirculation of vehicles looking for a parking space.” It’s unclear what “most” means. This assumption should be more conservative unless there exists some data to support this claim. (Curran_2564)

Response 11-233: It is anticipated that the premium parking spaces located near the arena, including those in the South Lot and/or the parking within and below the hotel’s podium would require a parking permit. A comprehensive TMP is described in Chapter 17, “Mitigation,” and a draft copy is included in Appendix J of the FEIS, which provides more information about pre-purchased parking that is expected to be utilized, and case studies of where this has been used at other event venues. The percentage of autos that would use pre-purchased parking has no bearing on nature of conservativeness of the analysis in the EIS.

Comment 11-234: A bridge over the Cross Island Parkway (BIN 2-23177-0) is proposed to be open for egress which appears to be Department of Parks & Recreation-owned. Please contact DPR. (NYCDOT_2562)

Response 11-234: DPR has been included in the FEIS as an involved/interested agency and would be contacted regarding the Exit 26A overpass at the appropriate point in time. This overpass is currently open for egress during the racing season at Belmont Park.

Comment 11-235: The primary egress route shown in DEIS Figure 11-17 directs vehicles onto the Cross Island Parkway to get back onto Hempstead Turnpike. Trucks do not have access to the Cross Island Parkway and therefore cannot take the given route. Please provide an alternative primary egress route for trucks wishing to travel on the nearby truck routes, such as Hempstead Turnpike, without traveling on the Cross Island Parkway. (NYCDOT_2562)

Response 11-235: As described in Chapter 11, “Transportation,” of the EIS, Gate 14 would provide egress for service vehicles to Hempstead Turnpike in the eastbound direction. The FEIS clarifies this to indicate that trucks would not exit the site via the Cross Island Parkway and that trucks destined to Hempstead Turnpike in the westbound direction would exit via Gate 14 and turn left at Gate 5 Road to turn around within the site and then exit at Gate 5.

Comment 11-236: We have concerns that any issues with internal circulation on Site B could back up past the exit from northbound Exit 26A onto the Parkway. Please explain where the parking garage entrances will be and whether there will be a paid parking system, and if so how and where will patrons pay, and how long each transaction will take. If cars are stopped along the road
connected to the off ramp it could back-up the highway. Please explain how adequate site circulation will be maintained. (NYCDOT_2562)

Response 11-236: Parking facility entries are shown on Figure 11-6 and access routes to Site B are shown on Figure 11-7. As described on Page 11-58, vehicles entering the parking on Site B would not need to wait to collect a ticket; fees would be collected upon exit. A draft copy of the TMP is included in Appendix J and provides further details regarding on-site circulation.

EMERGENCY VEHICLE RESPONSE TIMES

Comment 11-237: It is erroneous to assume that emergency response vehicles can maneuver through congested areas as they are not bound by standard traffic controls. There is no room in the busy local intersections and two-lane thoroughfares for this to occur. Suggest the additional traffic will slow emergency response times.

Concerned about the increase in traffic with the proposed plan, how will the police and fire respond given the unmitigated traffic?

How will our ambulances, fire, police get around town to help the people of our village? With regard to Transportation, the unanswered questions encompass, but are not limited to, emergency vehicle response times and the fact that increased traffic, resulting from the Proposed Project, will impede immediate emergency responses on the two-lane, two-way main thoroughfares of Floral Park and the surrounding communities. Detailed time-related studies must be completed to better understand the traffic impact. Studies must compare historical emergency response time data to projected traffic flow for the emergency units. Concerned about increased traffic and impacts on safety and first responders as well as congestion. (Baggott_2143, Colgan_2542, Hayden_TS2_930, Juliano_TS2_915, Madden_TS3_956, Malfonsi_2558, O’Grady_TS1_879, Pombonyo_2398, Pombonyo_TS1_862)

Response 11-237: A major focus of the traffic analyses conducted in the EIS was to keep traffic from diverting onto local residential streets. In response to public comments on the DEIS regarding such diversions and emergency response times, between publication of the DEIS and the completion of this FEIS, ESD has identified measures to increase the use of public transportation and reduce reliance on auto use. With the implementation of proposed mitigation measures, only two intersections on the local street network would have impacts that could not be fully mitigated and the potential for traffic diversions on to local streets would be minimized. With these proposed mitigation measures, project-generated traffic volumes are not expected to significantly affect emergency response times. The TMP includes a monitoring plan that would measure emergency response times for the surrounding areas on event and non-
event days to assess whether or not the roadway network is significantly encumbered by Project-generated traffic congestion that could potentially impede the flow of emergency vehicles and to identify additional feasible and practicable mitigation, if necessary.

Comment 11-238: It is claimed that emergency response will not be affected. Given the amount of trips added to an already congested system, up to 6,846 vehicles, this causes a major traffic problem. Also, the Cross Island Parkway does not have shoulders, further subjecting emergency vehicles to congestion. Again, no mitigation is offered. (EAM_2563)

Response 11-238: Regarding mitigation, please see the response to Comment 11-237. The 6,846 vehicles cited by the commenter refers to the maximum parking demand generated by the Proposed Project (shown in Chapter 11, Table 11-44), which would occur on a weekday evening with a sold-out concert at the arena (19,000 seats), and not all of these vehicles would arrive or depart in a single hour. Additionally, the commenter’s statement about the Cross Island Parkway not having shoulders is inaccurate. The Cross Island Parkway does contain shoulders, except at constrained locations such as overpasses and underpasses, which could be used by vehicles to pull off to the side of the road in an emergency.

Comment 11-239: Concerned about what would happen if an evacuation was required with all the traffic. (King_TS2_914)

Response 11-239: Traffic analyses of evacuation conditions are not part of the SEQRA process. As described in the response to Comment 3-12, NYAP would be developing comprehensive plans prior to the area opening for an evacuation as part of pursuing SAFETY Act certification by the Department of Homeland Security.

GENERAL COMMENTS

Comment 11-240: The accepted format for a traffic impact study was not followed. Normally, trip generation for each use is presented, followed by trip distribution, trip assignment, “No Build” condition volumes, through “Build” condition volumes, so that a presentation of the facts can be understood by a reader. (EAM_2563, Schneider_TS1_849)

Response 11-240: The format of Chapter 11 follows a logical order and includes trip generation, followed by trip distribution and assignment, and assessments of existing, No Action, and With Action conditions. All of the cited information is contained within Chapter 11, “Transportation,” or Appendix F.

Comment 11-241: ESD did not release to the public the data upon which it relied when making its assumptions and conclusions for purposes of determining
potential traffic impacts. I strongly urge ESD to release this information to the public so that it has a meaningful opportunity to review it and comment upon it. I urge ESD to provide the public with more details regarding its traffic analysis and traffic modeling (if any was used).

There were no printouts made available to allow for a complete analysis and evaluation of the calculations for capacity. No traffic software printouts are provided.

Outside professional consultants hired by the Village of Floral Park, NV5, have determined that an independent review of the DEIS traffic study is warranted. The appendices to the DEIS did not contain much of the traffic data that would normally be included as an appendix to a DEIS for a project of this size, scope, and significance. After NV5 reviewed the traffic data contained in the appendices and as well as the data recently released by the DEIS, they identified major deficiencies in the methodology employed in the traffic analysis. (Culotta_2365, EAM_2563, Schneider_TS1_849, VFP_2548)

Response 11-241: The EIS provides full details of the traffic analysis and traffic modeling results, within either Chapter 11, “Transportation,” Chapter 17, “Mitigation,” or within Appendix F. This includes traffic volume maps, intersection and highway level of service summary tables, trip generation and modal split assumptions. As described in the response to Comment 1-20, backup data for technical analyses is typically provided to relevant review agencies (in this case, NYSDOT, NYCDOT, and NCDPW) when a DEIS is published, as in this case. This large amount of backup data is not typically included in an EIS, but is provided upon request. ESD has met with representatives of each of the affected transportation agencies to respond to their detailed technical questions and to resolve any of their issues. NYCDOT and NCDPW also provided comments on the DEIS and responses to those comments are provided separately in this response to comments document. With respect to the data referenced in the comment, it was provided to the Village of Floral Park on January 9, 2019, and responses to the comments provided by the Village of Floral Park on the DEIS are provided separately within this response to comments document.

Comment 11-242: Traffic counts and capacity analysis are not included in the DEIS. (Fishinger_TS1_868)

Response 11-242: The traffic counts were tabulated and summarized and presented as traffic volume maps within Appendix F of the EIS. The capacity analyses were also summarized within a series of levels of service tables within Appendix F of the EIS.
Comment 11-243: NYCDOT has proposed bridge rehabilitation projects on Hempstead Avenue over the CIP and for Hempstead over the CIP service lane/northbound on-ramp. An in-depth inspection, survey, traffic analysis, and scope determination are anticipated to kick off in April 2019. Construction registration is scheduled for May 2023 with construction Notice to Proceed in June 2023, and a construction duration of three years. (NYCDOT_2562)

Response 11-243: The construction would occur after the opening of the Proposed Project.

Comment 11-244: The new proposed pedestrian bridge will run above Hempstead Turnpike, a Through Truck route; please ensure that the pedestrian bridge will have a minimum of 15 feet in height clearance. This height clearance will allow trucks to safely traverse the corridor without obstructing the proposed infrastructure. (NYCDOT_2562)

Response 11-244: The potential pedestrian bridge over Hempstead Turnpike would be located in Nassau County, and NYAP has been coordinating with NYSDOT regarding the minimum height clearance for a pedestrian bridge.

Comment 11-245: Please provide No-Action reassignment maps. (NYCDOT_2562)

Response 11-245: No Action traffic volume reassignment maps for the conversion of 103rd Avenue between 223rd and 225th Streets to a one-way westbound street were included in the traffic backup provided to NYCDOT.

Comment 11-246: The DEIS concedes that a number of intersections will be adversely affected by the project with a few being in Floral Park. For example, the proposed volume increases for Plainfield Avenue and Jericho Turnpike are at its maximum only 85 vehicles per hour. However, since the assumption that vehicles will only use the Cross Island is obviously flawed, the assumed increase of 85 vehicles per hour is almost certainly a significant underestimation. (Buechler_FL4_032, Trainor_TS1_854)

Response 11-246: The EIS does not assume that project-generated traffic would only use the Cross Island Parkway; as noted by the commenter, there was traffic assigned to Plainfield Avenue and Jericho Turnpike, and there were significant adverse traffic impacts identified in Floral Park that were mitigatable.

Comment 11-247: Request the Administration to take additional steps to study and mitigate the potential impacts of this proposed development. For instance, if ESD is unwilling, NYCDOT should independently study the potential impacts on the New York City street and mass transit system to understand if additional traffic mitigation measures are needed throughout Queens. (Stringer_144)
Chapter 22: Response to Public Comments

Response 11-247: ESD has met with representatives of NYCDOT to respond to their questions and resolve any of their issues (see correspondence in Appendix M).

Comment 11-248: An in-depth traffic study must be completed.

Last week ESD implicitly acknowledged the obvious shortcomings of this DEIS by the fact that ESD extended the contract of AKRF to prepare such basic aspects of the DEIS that are currently completely lacking such as a competent traffic analysis and concrete mitigation proposals.

Traffic and transportation analysis regarding the project have not been studied in sufficient depth, and critical details from analysis are glossed over and covered insufficiently. (VFP_2548)

Response 11-248: The three reviewing transportation agencies—NYCDOT, NYSDOT, and NCDPW—have each reviewed the DEIS, raised several comments to the EIS team, and all comments have been resolved. Regarding “concrete mitigation proposals,” the EIS identifies traffic engineering improvements that would be able to mitigate all significant adverse traffic impacts on the local street network except for two intersections (Hempstead Avenue at Springfield Boulevard and Hempstead Avenue at 225th Street). Regarding the Cross Island Parkway, however, since physical infrastructure improvements such as widenings are neither practicable nor reasonably feasible, a TMP was developed for the DEIS and has been further developed, refined, and quantitatively evaluated for the FEIS including major new initiatives (i.e., “concrete mitigation proposals” demanded by the local community and elected officials) such as the development of a new, full-time LIRR Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties and a range of demand management strategies aimed at shifting demand from auto to alternate modes of transportation.

Comment 11-249: The Village of Floral Park requested that Nassau County undertake a full and independent traffic analysis of this project to determine the impact on the communities of western Nassau County. Presently, the Village is awaiting County Executive Curran's response to this request. The comment period for the DEIS should be kept open to reflect the comments generated by the NYCDOT analysis which is underway and hopefully the study to be undertaken by Nassau County. (VFP_2548)

Response 11-249: The EIS team has worked very closely with NCDPW and NYCDOT to resolve their questions and concerns regarding traffic estimated to be generated by the Project. ESD and its consultants have met several times and have also presented draft and updated versions of the TMP and would be incorporating their suggestions both now and as the Project is ready to
open and as it opens since NCDPW and NYCDOT would be part of the stakeholder group monitoring the effectiveness of the TMP.

**Comment 11-250:** Since the issuance of the DEIS, the City of New York and Nassau County have announced their plans to conduct traffic studies of the area surrounding Belmont Park, including the CIP. I strongly urge ESD to consider the results of these studies in its analysis and to incorporate the results into a Supplemental EIS.

We urge you to have the Nassau County Planning Department and other relevant departments undertake a full and independent traffic study to identify potential impacts and consider whether sufficient mitigation is possible given the size and scope of the proposed project. In order to accommodate this study, we ask that you request ESD to leave the DEIS comment period open so that the results of your study can be incorporated into the EIS record. (Culotta_2365, VFP_2548)

**Response 11-250:** During the period between publication of the DEIS and completion of this FEIS, ESD, its consultants, and NYAP have been working closely with NYSDOT, NYCDOT, and NCDPW to resolve transportation questions and issues. During this time, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line and a comprehensive draft TMP has been developed that would result in a major reduction in vehicular traffic volumes that have been projected in the DEIS. All of these agencies have also been involved in the review of the Project’s TMP and would continue as members of the stakeholder group monitoring the effectiveness of the TMP in reducing traffic demand. There was no need to prepare a Supplemental EIS.

**AIR QUALITY**

**GENERAL**

**Comment 12-1:** There is concern about the project's effects on air quality and air pollution, and that the DEIS does not adequately address potential impacts on air quality. (BPCC_132, Brown_TS2_928, Conway_TS4_1035, Conway_TS4_1035, Culotta_TS1_890, English-Young_1052, Gayron_TS4_991, Laguerre_105, McGeever_2555, Mesnick_2237, Moy_148, Rakowski_TS2_909, Sferlazza_2263, Trentacoste_TS2_902, Weiner_SSAS_2097)

There is concern about the project's potential air quality effects on schools and children. The project needs to include a berm or barrier to protect the students and residents of Floral Park from pollution, and this should be in place prior to construction. (BPCC_132, Culotta_2572, Ferone_TS1_852, Maurer_011, Maurer_TS2_931)
Chapter 22: Response to Public Comments

Response 12-1: The analyses presented in Chapter 12, “Air Quality” were consistent with the Scope of Work and what is required for SEQRA. The analyses determined that emissions from the Proposed Project's mobile and stationary sources would not result in any significant adverse impacts at any nearby receptors, including residences and schools. With respect to potential air quality effects during construction, please see the response to Comment 15-3.

Comment 12-2: The site plan shows a road running along the backyard of many communities. What will protect them from noise pollution, smog, smoke, exhaust, and light pollution? Please describe in more detail how the berm or barrier would alleviate air pollution. (Carrig_101, Kaminsky_TS1_845, Longobardi_TS1_856)

Response 12-2: The vegetative buffer would provide approximately 100 feet of space between the Belmont Park Road on the south site and the nearest residences. Emissions from vehicles traveling along Belmont Park Road road would be dispersed downwind, and the berm itself would provide additional protection as a barrier. CO concentrations diminish rapidly over relatively short distances.

Comment 12-3: Request that North and East Lots not be used for project, as these are immediately adjacent to Floral Park schools, soccer fields, playgrounds, and homes. Use of these lots will significantly increase noise (i.e. Car horns), local air pollution, light pollution, and refuse. Request that the scope of the project be reduced so that the use of the North and East Lots will not be required. (Alfonsi_2567, Browne_TS1_853, Buechler_FL3_030, Cheng_014, Coven_2231, Crowe_FL9_2074, Form Letter 3, Form Letter 9, FPBPTA_2226, McGovern_2322, McLoughlin_102, Spina_085)

Response 12-3: As detailed in Chapter 12, potential air quality effects from the Proposed Project’s parking facilities were analyzed. No significant adverse air quality impacts were predicted. Other concerns related to utilization of the North and East Lots are addressed elsewhere in this document (see Comments 2-20, 6-5, and 13-2).

Comment 12-4: There is concern about the project's potential effects on increased risk of asthma and other respiratory diseases. (English-Young_1052, Solages_2402, Weiner_SSAS_2097)

Response 12-4: As presented in Chapter 12, the air quality analysis determined that emissions from the Proposed Project’s mobile and stationary sources would not result in any significant adverse impacts to air quality based on standards that are designed to be protective of public health. Specifically, the analyses found: none of the Proposed Project-affected intersections
would require a detailed microscale air quality analysis; the emissions from vehicles using the parking facilities would not result in any significant adverse air quality impacts; and the stationary source dispersion modeling determined there would not be any potential significant adverse air quality impacts from emission of nitrogen dioxide and particulate matter from the proposed heat and hot water systems for the Proposed Project.

**METHODOLOGY FOR PREDICTING POLLUTANT CONCENTRATIONS**

**Comment 12-5:** The DEIS on page 12-9 states “for arriving and departing vehicles an average speed of 5mph was assumed for travel within the parking facilities. All departing vehicles were assumed to idle for 1 minute before exiting.” There is no data to support how these assumptions were made. The entrance ramps to the CIP from the North Lot are extremely short so it's doubtful that vehicles will idle for 1 minute or less. An air quality analysis and a full analysis of cars exiting/entering the CIP from the project must be done. (VFP_2548)

**Response 12-5:** The assumption for vehicle idling is for engine operation prior to travel to the exits of the proposed parking facilities. The emission rate calculated based on the 5 mph travel assumption includes all operating states (acceleration, cruise, deacceleration and idling).

**MOBILE SOURCES**

**Comment 12-6:** At least 12 intersections surrounding the project site are projected to operate at a level of service of D or worse, yet ESD concludes no significant air quality impacts. The surrounding residential neighborhoods will experience soot and smog as a result of increased emissions from traffic. The City of New York and Nassau County are undertaking traffic studies to evaluate the potential traffic impacts. ESD should incorporate these and reevaluate the potential for air quality impacts. (Culotta_2365)

No analysis of CO screening only a verbal analysis. (EAM_2563)

**Response 12-6:** As described in Chapter 12, “Air Quality,” of the EIS, the mobile screening analysis for CO emissions followed the procedures outlined in the NYSDOT TEM. The screening procedure evaluates traffic conditions with the Proposed Project according to various factors, including intersection Level of Service, speed reductions and increase in traffic volumes. The screening analysis determined that at locations that met any of the referenced capture criteria, the increase in traffic volumes would not be sufficient to result in a violation of the CO National Ambient Air Quality Standard.
Chapter 22: Response to Public Comments

Comment 12-7: It appears that the air quality section is solely based on the traffic analysis. There is no analysis of air quality if the traffic issues cannot be mitigated and substantial amounts of traffic would be redirected to local streets. (VFP_2548)

Response 12-7: The mobile source screening analysis presented in the EIS is based on the future traffic conditions with the Proposed Project, assuming no mitigation. Therefore, even conservatively assuming no traffic mitigation is applied, the Proposed Project is not predicted to result in any significant adverse air quality impacts due to mobile sources of emissions.

Comment 12-8: Page 12-9 states, “Since there is no specific garage design at this time, the vent face was assumed to discharge towards the street that has the highest background levels of traffic, to be conservative.” What if these assumptions are not feasible? What if all alternatives have significant impact on the residents who surround the area? (VFP_2548)

Response 12-8: As higher traffic volumes result in greater levels of pollutant emissions, if the vent(s) for the proposed retail garage were vented to another location where traffic volumes are lower, total pollutant concentrations from the garage and background traffic levels would be lower. Therefore, the analysis demonstrates that the proposed garage would not result in any significant adverse air quality impact regardless of where the vent(s) is ultimately located.

OTHER

Comment 12-9: There is no air quality appendix. Any results are unsubstantiated. (EAM_2563)

Response 12-9: Chapter 12 presents details of the scope, methodology and data sources used for the analysis. The analysis was consistent with the Final Scope of Work, and the analysis and information presented in the EIS conforms to SEQRA standards. Raw data and model runs are typically not included in an EIS, even as an appendix. Specific requests made to the lead agency are accommodated as appropriate.

NOISE

Comment 13-1: There is concern about increased noise levels associated with the Proposed Project. (Barley_045, Brown_TS2_928, Chiara_TS3_960, Chu_093, Conway_TS4_1035, Culotta_TS1_890, Doherty_TS2_897, Kaminsky_TS1_845, Labissiere_TS4_1006, Laguerre_105, MacDonald_2354, Mezzetti_100, Rakowski_TS2_909, Solages_TS1_855, Viscovich_096, Zoleta_092)
There is concern over potential noise increase due to arena-related events and attendees. (Compo_010, McLoughlin_102, Zoleta_092)

People have homes along the South Lot, they don’t want to hear trucks coming and going and loud concerts in their backyard. (Amato_2362)

There is concern about potential noise pollution from arena-related traffic. (O'Grady_TS1_879)

There is concern that the projected increases in traffic will result in noise pollution. (English-Young_1052)

Response 13-1: Chapter 13, “Noise,” describes the results from a detailed analysis of the noise from the following Proposed Project components: project-generated vehicles traveling to and from the Project Sites and other directly affected areas; vehicles entering and exiting the parking lots (including Site B, South, North, and East Lots); electric shuttle buses transferring people to and from the parking lots; patrons accessing the arena; delivery trucks accessing the retail village on Site B; charter buses accessing the retail village on Site B; and the proposed electrical substation. The noise analysis follows guidance from, and assesses impacts against, the NYSDEC criteria. Noise from the arena was represented by a measurement conducted at a comparable well-attended event at an existing arena and included people accessing the event and leaving the event. Although noise from the Proposed Project may be audible and noticeable at times in the surrounding community, maximum predicted combined noise levels from all of the individual above-described noise sources would not rise to the level of a significant noise impact at any of the receptors analyzed (see Chapter 13, Figure 13-1 for receptor locations).

Comment 13-2: There is concern over potential noise impacts from arena patron parking, tailgating, and celebratory honking in the North and East Lots, particularly given their proximity to schools/school children. (Alfonsi_TS1_871, Browne_TS1_853, Buechler_FL3_030, Cheng_014, Coven_2231, Crowe_FL9_2074, Cunningham_TS4_989, DAmico_088, Form Letter 3, Form Letter 9, FPBPTA_2226, Gayron_TS4_991, McGovern_2322, Mezzetti_100, Spina_085, Stacom_844, Walsh_1040)

There is concern over expected honking from Islanders fans and resulting noise effects on the surrounding residential areas. (Alfonsi_TS1_871, Alfonsi_2330, Alfonsi_TS1_872, Alfonsi_TS3_953, Coven_2231, Culotta_2365, Gunther_TS3_938, McGovern_2322, Mesnick_2237)

The noise study is inadequate because it is based on levels of concert events at the Coliseum rather than Islanders games, with their infamous
Islanders honk. The baseline noise levels should consider that the North Lot is currently used for storage. Will your proposed buffer composed of dense vegetation and chain-link fence block tailgating and shuttle bus activity and protect children? Residents have to get up early. (Alfonsi_TS1_871, Culotta_2572, VFP_2548)

**Response 13-2:** Tailgating in parking lots and celebratory honking would be prohibited. NYAP would have security personnel, signage, and CCTV to enforce all parking lot regulations, including tailgating prohibitions and celebratory honking.

**Comment 13-3:** There is concern that the proposed vegetative buffer will do nothing to stop the noise and distraction to the Floral Park-Bellerose School. Please provide more details about the proposed barrier (berm/landscaping) that would minimize noise effects. Will it mitigate the noise? There should be a barrier and/or plantings to reduce noise. (Alfonsi_2367, Alfonsi_TS1_871, Chiara_TS3_959, Longobardi_TS1_856, Rakowski_2098, Zimmerman_TS4_1000)

**Response 13-3:** Chapter 13, “Noise,” describes the results from a detailed analysis of the noise from all noise components of the Proposed Project including Project-generated vehicles traveling to and from the North Lot, electric shuttle buses transferring people to and from the North Lot parking lots, people accessing the arena, and the proposed electrical substation. The noise analysis follows guidance from, and assesses impacts against, the NYSDEC criteria. The analysis accounts for noise resulting from activity in the North Lot at nearby receptors including the Floral Park residences (represented by receptors 1, 3, 4 shown in Figure 13-1 of the EIS) and the Floral Park-Bellerose School (represented by receptors 2 and 2a). Although noise from the North Lot may at times be noticeable and potentially intrusive, maximum predicted combined noise levels from all of the individual Project noise sources would not rise to the level of a significant adverse noise impact, and North Lot utilization would be low during school hours. As no significant adverse noise impacts were identified, mitigation was not necessary. The noise analysis of the North Lot does not include any benefit from the contemplated barrier, which would not have any noise attenuation properties, but rather function as a visual barrier. With respect to the description of the North Lot barrier, please see the response to Comment 1-88.

**Comment 13-4:** What other options are being considered to mitigate noise impacts on the surrounding residential area? (Carrig_101, Carrig_TS4_987)

There is concern over the potential for noise pollution from the project roadway and vehicle staging areas. (Kaminsky_TS1_845)
Response 13-4: Chapter 13, “Noise,” describes the results from a detailed analysis of the noise from all noise components of the Proposed Project including: Project-generated vehicles traveling to and from the Project Sites and other directly affected areas; vehicles entering and exiting parking lots (including Site B, South, North, and East Lots); electric shuttle buses transferring people to and from parking lots; and delivery trucks and charter buses accessing the retail village on Site B. The noise analysis follows guidance from, and assesses impacts against, the NYSDEC criteria. Noise from the retail village project roadway was analyzed at the residential receptors to the east of the site, including along Huntley and Wellington Roads (represented by receptor 5 shown in EIS Figure 13-1). These receptors are closest to the Project-generated noise sources and would therefore have the greatest potential to experience increases in noise levels due to the Proposed Project, whereas noise levels would be lower at greater distance from the noise sources. The bus staging area to the south of the retail village is not considered as a separate noise source in the analysis because noise from buses idling would be controlled through regulations and restrictions on the duration of idling. As described in the EIS, although noise from the Proposed Project may be audible and noticeable at times in the surrounding community, maximum predicted combined noise levels from all of the individual project noise sources would not rise to the level of a significant noise impact at receptor 5. Therefore, no noise mitigation is warranted. While the berm on Site B would provide some sound attenuation, and would be constructed prior to the construction of other Project components on Site B, its attenuation properties were conservatively excluded from the noise analysis.

Comment 13-5: There is concern about helicopter and airplane noise. The cumulative effects of all potential noise sources must be studied. (Alfonsi_1049)

Response 13-5: The noise analysis presented in Chapter 13, “Noise,” of the EIS analyzes project-generated sources of noise. The Proposed Project would not result in any increases to helicopter or airplane traffic at JFK or other surrounding airports, nor does the Proposed Project contemplate use of the existing helipad at Belmont Park. Therefore, these sources of noise are not considered as Project-generated noise sources for the noise analysis. The existing ambient noise levels that were measured, utilized for the noise analysis, and documented in the EIS include contributions from overhead aircraft and helicopter noise, where applicable. Any increases to helicopter or airplane noise in the future would not be related to the Project.

Comment 13-6: The North Lot near the Floral Park-Bellerose Elementary School will bring lots of noise and traffic to this quiet, safe neighborhood. If a parking
lot is set up here with access through the neighborhood both will be a thing of the past. (Mezzetti_100)

Response 13-6: The North Lot would be accessible only through the Cross Island Parkway and Hempstead Turnpike, with no access through the Floral Park side streets to the east. The detailed noise analysis described in the EIS accounted for noise from vehicles entering and exiting the North Lot. Although noise from project-generated traffic may be audible and noticeable at times in the area surrounding the North Lot, maximum predicted combined noise levels from all of the individual Project noise sources would not rise to the level of a significant adverse noise impact at any of the receptors analyzed.

Comment 13-7: On page 13-9 of DEIS Chapter 13, “Noise,” the Sound Power Level for the transformers is based off of transformer models that are not going to be installed at this substation. The Sound Power Levels for the transformers that will be installed at this substation are anticipated to be a maximum of 65dBA. (PSEG_043)

Response 13-7: Based on AKRF experience with similar transformer test reports and specifications from other projects, AKRF believes the data provided by PSEG represents a sound pressure level of 65dBA (not sound power level as indicated in this comment). Regardless, AKRF’s assumption of sound pressure level is conservative and results in no operational noise impacts due to the transformer or substation.

Comment 13-8: There is no mention in the noise subsection about the impact the noise will have on the horse population or the 1,000+ residents that live within the confines of Belmont Park. Why wasn’t that studied? (VFP_2548)

Response 13-8: Chapter 13, “Noise,” describes the results from a detailed analysis of the noise from all noise components of the Proposed Project at receptors representing noise-sensitive locations that would have the greatest potential to experience noise level increases resulting from the Proposed Project, including the Belmont Park dormitories and stable area represented by receptors 6b, 7a, 7b, 7c, 7d, 7e, and 7f (shown in EIS Figure 13-1). The noise analysis follows guidance from, and assesses impacts against, the NYSDEC criteria. As described in the EIS, at receptor 7e, the predicted noise level increase during one peak hour would slightly exceed the NYSDEC 6 dBA noise level increase threshold; however, the total noise level at this receptor would still be well below the 65dBA criteria recommended by NYSDEC for residential use. At all other receptors within the Belmont Park dormitories, the maximum predicted incremental change in noise levels does not exceed the NYSDEC threshold for significant noise impacts. Additionally, the potential noise effects on horses, including during training, is considered
based on the conservative impact criteria for humans and the horses’ similar hearing sensitivity to that of humans. Consequently, operation of the Proposed Project would not result in a significant adverse noise impact within the Belmont Park dormitories or stable area.

**CLIMATE CHANGE**

**Comment 14-1:** The DEIS fails to consider an increased need for cooling that may not be offset by a decreased need for heating as a result of climate change. (Weiner_SSAS_2097)

**Response 14-1:** As detailed in Chapter 14, “Climate Change,” two approaches were used to estimate annual energy consumption for the Proposed Project; energy consumption of the arena component was based on preliminary project-specific energy modeling performed as part of the design process while energy consumption for all other project components were based on information from the Commercial Buildings Energy Consumption Survey (CBECS) performed by the US Energy Information Agency. Energy data collected by the CBECS represents information for all existing buildings and does not include energy efficiency designs that are typically included in new construction.

The Applicant is currently evaluating specific energy efficiency measures beyond typical new construction and design elements that may be implemented, and is seeking to achieve certification under the Leadership in Energy and Environmental Design (LEED) for Building Design and Construction rating system, version 4. The Applicant is committed at a minimum to achieve the prerequisite energy efficiency requirements under LEED and would likely exceed them. To qualify for LEED, the Proposed Project would be required to exceed the energy requirements of New York State’s Energy Conservation Construction Code (currently the same as ASHRAE 90.1-2013), resulting in energy expenditure lower than a baseline building designed to meet but not exceed the minimum building code requirements by approximately 12 to 20 percent for new construction. The energy usage estimates presented in the EIS do not include the specific design measures intended to reduce energy consumption and GHG emissions. Therefore, these estimates conservatively overestimate the energy consumed by the Proposed Project.

The US Climate Change Science Program estimates that warming temperatures are expected to result in increased energy consumption to provide space cooling, and reduced energy consumption to provide space heating. Therefore, the potential effects of warming temperatures would fall within the conservatively high energy usage estimates reported in the EIS.
Comment 14-2: The project should incorporate green design. (Moriarty_2144)

Response 14-2: As detailed in Chapter 14, “Climate Change,” measures to improve energy efficiency for the arena component of the Proposed Project have been identified, but specific measures for other project components other than the arena are not yet known. However, the Applicant is committed at a minimum to achieve the prerequisite energy efficiency requirements under LEED for all project components and would likely exceed them.

The arena is expected to have an energy-efficient building envelope and energy-efficient glazing designed to reduce heat loss and facilitate daylight harvesting by admitting more daylight than solar heat. The energy systems would utilize high-efficiency heating, ventilation, and air conditioning (HVAC) systems designed to reduce energy consumption and on-site renewables such as wind or solar would be considered for certain processes (e.g., heating water for HVAC/hot water systems). The building would have high-albedo roofs to reduce energy consumption and reduce the building’s contribution to the urban heat-island effect. Motion/occupancy sensors for lighting and potentially for climate control would be incorporated. Water conserving fixtures exceeding building code requirements would be installed, including 1.26 gallons-per-flush toilets and pint-flush urinals—or potentially waterless urinals, indirectly reducing energy consumption associated with potable water production and delivery. Energy performance would be tracked to allow for strategies to maintain and improve efficiency. Storage and collection of recyclables would be incorporated in building design.

Comment 14-3: The DEIS’s analysis of the project's potential effects on greenhouse gas emissions is incorrect. The project will have adverse effects on climate change. The project should include additional strategies to reduce GHG emissions. (Alfonsi_1044, EAM_2563, Esposito_CCE_141, Weiner_SSAS_2097)

Response 14-3: Chapter 14, “Climate Change,” evaluates the greenhouse gas (GHG) emissions that would be generated by the construction and operation of the Proposed Project as well as its consistency with the Climate Smart Communities Pledge, as part of the Town’s GHG reduction goal.

The EIS estimated that the building energy use and vehicle use associated with the Proposed Project would result in up to approximately 158 thousand metric tons of carbon dioxide equivalent (CO2e) emissions per year. The Proposed Project’s commitment to building energy efficiency, exceeding the energy code requirements, would ensure consistency with the decreased energy use goal defined in the Climate Smart Communities Pledge. The Proposed Project would also support the other GHG goals by virtue of its proximity to public transportation, reliance on natural gas,
LPG, or electricity (rather than fuel oil), commitment to construction air quality controls, and the fact that as a matter of course, construction in the New York City metropolitan region uses recycled steel and includes cement replacements.

Comment 14-4: Will you have a greenhouse on the roofs of all developed business to ensure that all vegetation prepared on the property comes directly from your property first? (Moriarty_2144)

Response 14-4: The intent of the Proposed Project is to preserve as many trees and existing vegetation as possible, and the design team is in consultation with experienced arborists to optimize preservation within the proposed design. The design does not include on site greenhouses for vegetation growth. Roofing design would include the installation of high solar reflective roofing material in order to reduce potential heat island effects.

Comment 14-5: The project should incorporate renewable energy to offset the project's energy needs. For example, the project should explore solar and wind energy rather than natural gas. What clean energy renewable options are being explored? Natural gas is not a clean energy. (Alfonsi_1044, Bizante_TS3_961, Cunningham_TS4_1023, Esposito_CCE_141, Gullo_TS3_939, Gullo_TS4_1034, Moore_TS3_952, Moriarty_2144, Moriarty_TS4_1004, Smith_TS4_1016, Weiner_SSAS_2097)

We urge NYAP to use renewable energies whenever possible. This is including but not limited to solar, geothermal and bioenergy. Development should not shy away from a goal well above 50%. (Solages_2402)

Response 14-5: As discussed in Chapter 14, “Climate Change,” of the EIS, the Applicant is seeking to achieve certification under the Leadership in Energy and Environmental Design (LEED) for Building Design and Construction rating system, version 4. The Applicant is committed at a minimum to achieve the prerequisite energy efficiency requirements under LEED and would likely exceed them. In order to achieve this minimum, the Applicant is evaluating specific energy efficiency measures and design elements including the use of on-site renewables such as wind and solar for certain processes (e.g., heating water for HVAC/hot water systems).

Furthermore, in 2019 Governor Andrew Cuomo proposed to include a requirement of 70 percent renewable electricity generation by 2030 (increased from 50 percent) as part of New York’s Clean Energy Standard in order to achieve 100 percent carbon-free electricity generation by 2040. As grid electricity reduces its carbon intensity, emissions of GHGs associated with the Proposed Project would also be reduced.
Chapter 22: Response to Public Comments

Comment 14-6: Are there going to be Solar Roadways used on this property? When damaged, Solar Roadways are easy to replace. You can use the underside of that solar roadway to pass water drainage and wiring underneath. With a solar panel roadway, you will never have the need to use salt when it snows. We need real GREEN solution in big development projects that will return power back to the surrounding community. (Moriarty_2144)

Response 14-6: As detailed in Chapter 14, “Climate Change,” of the EIS, the Proposed Project would use solar reflective, high-albedo roadways to reduce the contribution to the urban heat-island effect. Small-scale installations of the Solar Roadway technologies (e.g., in Tourouvre-au-Perche, France and Sandpoint, Idaho) have demonstrated difficulties in achieving cost-effective levels of efficiency. Therefore, the Proposed Project’s design does not consider the installation of Solar Roadways.

Comment 14-7: The DEIS on page 14-9 states, “While measures to improve energy efficiency for the proposed arena have been identified, specific measures for uses other than the arena are not yet known.” How can the DEIS make conclusions if the shopping center has not been examined for this section? What happens if there are adverse climate effects of other uses besides the arena? (VFP_2548)

Response 14-7: Energy consumption for the Proposed Project components other than the arena were estimated based the total development proposed and information from the Commercial Buildings Energy Consumption Survey (CBECS) performed by the US Energy Information Agency. Energy data collected by the CBECS represents information for existing buildings and does not include energy efficiency designs that are typically included in new construction. As specific measures to improve energy efficiency are not yet known, preliminary estimates do not yet include specific design measures intended to reduce energy consumption and GHG emissions. However, the Applicant is committed at a minimum to achieve the prerequisite energy efficiency requirements under LEED for all project components and would likely exceed them. Therefore, the energy consumption estimates in the EIS are conservatively high.

Comment 14-8: How could the DEIS state that there may be a 25 percent increase in GHGs for a 2-mile segment but not describe how that may be detrimental to the communities adjacent to this 2-mile segment? (VFP_2548)

Response 14-8: As detailed in Chapter 14, “Climate Change,” the potential increased emissions would generally be limited to small segments (approximately 2 miles) of the Cross Island Parkway and would be limited to peak traffic hours where congestion would occur. Therefore, the potential to increase congestion is not anticipated to significantly increase regional GHG
emissions. Local communities would not be directly impacted by the potential increase in peak hour emissions.

Since the Proposed Project would be located outside of the potential future flood zones, the indirect impact to the local community would be limited to the potential to affect local flooding conditions during severe precipitation events. The Proposed Project would include a comprehensive stormwater management system that would accommodate peak precipitation under future conditions. As a result, the Project would not have a significant adverse impact on on-site or off-site stormwater management facilities, stormwater runoff on surrounding communities, and would not exacerbate local flooding conditions during severe precipitation events. Therefore, the Proposed Project would overall be designed to provide resilience to the potential future conditions.

**Comment 14-9:**
ESD should identify all potential impacts and mitigation in the area of climate change during construction. For example, ESD should identify as mitigation measures restrictions on idling time for vehicles, the use of diesel in tools and other equipment, and other technology for exhaust pipes, etc. (Culotta_2572)

**Response 14-9:**
As discussed in Chapter 15, “Construction,” of the EIS, in order to minimize construction pollutant emissions (both criteria pollutants and GHGs), NYAP would require in its construction contracts that the contractors implement the following mandatory measures from ongoing construction:

- **Clean Fuel.** ULSD fuel would be used exclusively for all diesel engines throughout the construction areas.

- **Diesel Equipment Reduction.** As early in the construction period as logistics would allow, diesel- or gas-powered equipment would be replaced with electrical-powered equipment such as welders and chipping saws (i.e., early electrification) to the extent feasible and practicable.

- **Idling Restriction.** As required by New York State Environmental Conservation Law (ECL), all vehicles would be prohibited from idling for more than five minutes. The idling restriction excludes vehicles that are using their engines to operate a loading, unloading, or processing device (e.g., concrete-mixing trucks) or otherwise required for the proper operation of the engine.

- **Best Available Technologies.** Non-road diesel engines with a power rating of 50 horsepower (hp) or greater and controlled truck fleets (i.e., truck fleets under long-term contract for the Proposed Project), including but not limited to, concrete mixing and pumping trucks,
would utilize the best available technology (BAT) (currently diesel particulate filters) for reducing diesel particulate matter emissions.

- **Utilization of Newer Equipment.** EPA’s Tier 1 through 4 standards for non-road engines regulate the emission of criteria pollutants from new engines, including PM, CO, NOx, and hydrocarbons (HC). Efforts would be made throughout construction to utilize non-road construction equipment and engines meeting at least the Tier 3 emissions standards.

With these measures in place, emissions of GHG associated with the construction of the Project would be minimized. Furthermore, construction in the New York City metropolitan region uses recycled steel and includes cement replacements. All of these factors demonstrate that the Project is consistent with the *Climate Smart Communities Pledge* as part of the Town of Hempstead’s GHG reduction goals.

**Comment 14-10:** The DEIS on page 14-10 states that construction waste would be diverted from landfills to the extent practicable by separating out materials for reuse and recycling. Where would the separation of materials occur? If on site, where and how would this impact local communities? (VFP_2548)

**Response 14-10:** Construction waste separation and demolition diversion from landfills would be specified for the entire Project duration by the General Contractor and all participating subcontractors would be required to separate waste into five waste diversion streams onsite. The General Contractor is required to identify five waste diversion streams, and divert four streams while reaching 75 percent by weight diversion minimum for the arena and associated site work.

Onsite separation may require additional operation of construction equipment in order to sort and transport material. This may result in additional noise and air pollutant emissions. However, the additional operations is not anticipated to result in a significant change to construction logistics, and would fall within the conservative assumptions used in the EIS analyses. Furthermore, separation activities would move throughout the site over the construction period such that potential effects would not persist in any single location, and no portion of the adjacent sensitive receptor locations would be subject to the full effects for the entire construction period.

**CONSTRUCTION**

**GENERAL**

**Comment 15-1:** A liaison from ESD should be appointed to address construction issues, particularly as they affect the day-to-day operations of schools. (Madden_TS3_956)
ESD doesn't identify who would be responsible for overseeing construction including implementation of mitigation. Urges ESD to assemble a community task force to coordinate with the developers, provide periodic oversight, and ensure that the project is implemented according to the EIS and ROD. (Culotta_2365)

Response 15-1: As detailed in Chapter 15, “Construction,” NYAP would require in its construction contracts that contractors implement in a number of measures during construction to minimize potential impacts to nearby communities from ongoing construction. These measures include staffing the project office with on-site supervision for rapid response to neighborhood concerns and maintaining a 24/7 toll-free hotline and email address assigned to and monitored by a community outreach representative, to include direct communication with an on-site contractor/supervisor for real-time response. In addition, advance notification of any disruptive work or work closures to nearby community would be provided and at least regular quarterly public meetings would be established for community representatives and the contractor to discuss construction activities and community concerns.

Comment 15-2: ESD should assemble a community taskforce to oversee construction and ensure appropriate mitigation oversight for the project. (Culotta_2365, Culotta_2572)

Response 15-2: The Developer would commit to a Memorandum of Environmental Conditions (MEC) that would provide the required mitigation actions. The MEC would be a Developer covenant under the transaction documents. ESD would monitor the Applicant’s compliance with the MEC.

Comment 15-3: What materials will be stored in the North and East Lots? How will the materials be loaded for storage? Will cranes be used? How will materials be shipped to and removed from the site - rail or truck? If by truck, what routes will be used and at what time of day? What precautions will be used to prevent dust/ debris from falling off trucks? How will the precast portions of the arena be transported to the site? Will any temporary or permanent road closures be needed? (VFP_2548)

Response 15-3: As detailed in Chapter 15, “Construction,” the East Lot would remain in its existing paved condition. The North Lot would be resurfaced and restriped to maximize the number of spaces that can be achieved, and new lighting would be installed in the North and East Lots. Materials would be transported by trucks and are expected to travel to/from these lots via Hempstead Turnpike and would generally distributed throughout the workday when the construction site is active with more trips made during the early morning and fewer trips made towards the late afternoon. Pre-
cast portions of the arena are also expected to be transported to the Project Site via trucks. Equipment used for activities in the North Lot, including truck loading/unloading activities, would include bulldozers, excavators, paving equipment, rollers, and forklifts. Construction material and equipment staging, as well as worker parking, are anticipated to be accommodated within these lots. A dust control plan would be implemented to minimize dust emissions from construction activities. For example, all trucks hauling loose material would be equipped with tight-fitting tailgates and their loads securely covered prior to leaving the Project Sites.

As described in Chapter 15 of the FEIS, temporary lane and/or sidewalk closures may be required along Hempstead Turnpike adjacent to the Project Sites to facilitate construction of one or more grade-separated connections between Sites A and B, utility connections and sidewalk improvement. The placement of the spans for a pedestrian bridge across the Hempstead Turnpike would be anticipated to require limited full lane closures in both directions; these closures would likely occur during the night. In these instances of temporary lane closures, Work Zone Traffic Control (WZTC) plans would be implemented to ensure minimum disruption to traffic or pedestrian flow.

**Comment 15-4:**

There is no mention of the ongoing MTA Mainline Expansion Project and the cumulative effects of two major ongoing construction projects in such a small area. (VFP_2548)

LIRR is undertaking a major construction project involving the Third Track of its Main Line. It is not clear whether the construction activities of LIRR's Third Track Project (in Floral Park and surrounding communities) will overlap with ESD's Proposed Project. ESD should evaluate and consider the cumulative impacts of these construction efforts (such as traffic, parking, noise, etc.). (Culotta_2365, Culotta_2572)

**Response 15-4:**

In response to public comments, additional text has been included in Chapter 15, “Construction,” of the FEIS to discuss the potential cumulative effects of the Proposed Project with the LIRR Expansion Project. As described in the FEIS, due to the geographical locations of the two projects (which are more than 3,000 feet apart), the cumulative construction effects are estimated to be minimal.

**Comment 15-5:**

Many unanswered questions remain. These include, the construction process and the details of how the construction of each of the proposed facilities will unfold and impact Floral Park and the other communities that border Belmont Park. These include, the Power Plant, its specific location and the details of the construction process, especially as it relates
to connections with electrical grids and lines outside of Belmont Park; National Grid and statements regarding the inadequacy of the current infrastructure to deliver energy to the Proposed Project and the prerequisite need for significant system upgrades (i.e., a pipeline); and numerous other areas cited in the public testimony. (Pombonyo_2398)

Response 15-5: Chapter 15 of the FEIS describes the anticipated construction schedule, construction logistics (e.g., site access points and potential staging area locations), activities likely to occur during construction, and the types of equipment that are expected to be used. Specific location and details of the construction process for the various components of the Proposed Project, including the Belmont electrical substation and the associated underground distribution feeders and transmission lines, are described in Section C, Construction Description, of the chapter.

With respect to the provision of natural gas, please see the response to Comment 3-34.

VISUAL RESOURCES

Comment 15-6: To mitigate visual impacts from construction staging, fencing should be used to cover construction sites where feasible. Measures should be undertaken to direct light downward to avoid impacts resulting from construction lighting. (Culotta_2365, Culotta_2572)

Response 15-6: Construction areas would typically be surrounded by construction fences and shielded from public view. Construction fences would be uniform and neat in material and appearance. Although the character and quality of views in the surrounding communities during construction of the Proposed Project would be modified, such effects would be temporary in any given location. To the extent practicable, directional lighting at night would be used to protect residences from light pollution and to avoid the potential for adverse visual impacts during construction.

HAZARDOUS MATERIALS

Comment 15-7: There is a concern over potential hazardous materials exposure from excavation during construction. (Paoli_TS3_950)

Response 15-7: As detailed in Chapter 8, “Hazardous Materials,” the Phase I and subsurface assessments found no evidence of significant contamination of soil, groundwater, or soil vapor at the Project Sites. Nevertheless, a variety of measures such as a Soil Management Plan (SMP) and a Construction Health and Safety Plan (CHASP) would be incorporated into the Proposed Project to reduce the potential for exposure to any hazardous materials that may be present during construction. With the incorporation of these measures, the potential for significant adverse effects related to hazardous materials would be avoided.
Chapter 22: Response to Public Comments

TRANSPORTATION

Comment 15-8: What will the construction routes be as trucks are not permitted to use the parkways? (Browne_TS1_853, Wagner-Tyson_TS2_918)

The Cross Island Parkway is just that—a Parkway which does not allow any commercial traffic—so during the two to three year development phase, all the construction trucks will have to use the LIE and then come into Floral Park, Elmont etc. via residential streets. This will contribute to an already overloaded village infrastructure. (Maguire_1041)

Response 15-8: As described in Chapter 15, “Construction,” of the EIS, trucks making deliveries to construction sites would primarily utilize truck routes such as Hempstead and Jamaica Avenues to travel to and from the Clearview Expressway and Long Island Expressway. Other truck trips, including deliveries from local businesses, would be expected to travel to and from points east via Hempstead Turnpike. The results of a detailed traffic analysis show that construction activities associated with the Proposed Actions during the projected peak quarter of construction would result in significant adverse traffic impacts at three intersections out of the eight intersections analyzed during the 6:00 AM to 7:00 AM peak hour. As detailed in Chapter 17, “Mitigation,” implementation of traffic engineering improvements such as the installation of new traffic signals at currently unsignalized intersections and modification of signal phasing and timing at currently signalized intersections would provide mitigation for all of the anticipated significant adverse traffic impacts at these locations.

Comment 15-9: Construction and construction vehicle traffic should not be allowed to occur during the morning and evening rush hours. (Pelletiere_TS2_908)

Response 15-9: Construction site activities would normally take place on weekdays during the typical construction shift of 7:00 AM to 5:00 PM. Construction truck trips would typically be distributed throughout the day—depending upon the specific types of construction activities taking place—and most trucks would remain in the area for short durations.

Comment 15-10: The DEIS does not properly address the potential for adverse impacts from construction traffic and construction vehicles. (Longobardi_TS1_856, Martinez_TS2_896, Moy_148)

There is concern that construction will increase traffic on local roadways. (Gribbins_2070, Wagner-Tyson_TS1_863)

Response 15-10: The FEIS includes a detailed construction traffic analysis that identified the potential for significant adverse traffic impacts at three intersections out of the 10 intersections analyzed during the 6:00 AM to 7:00 AM peak
hour and at 3 intersections out of the 10 intersections analyzed during the 5:15 PM to 6:15 PM peak hour. As detailed in Chapter 17, “Mitigation,” implementation of traffic engineering improvements such as the installation of new traffic signals at currently unsignalized intersections and modification of signal phasing and timing at currently signalized intersections would provide mitigation for all of the anticipated significant adverse traffic impacts except for the intersection of Hempstead Avenue and Springfield Boulevard, which would have one unmitigated significant adverse impact during the weekday PM construction peak hour.

Comment 15-11: What impacts will switch work have on LIRR mainline operation? (EAM_2563)

Response 15-11: Switch work activities would be carried out in manner that would minimize disruption to LIRR customers and mainline operation. Consistent with existing LIRR maintenance practices, some of this work may be carried out on nights and weekends or other LIRR off-peak hours.

Comment 15-12: The DEIS does not address what, if any, remediation would be done if any local roads are damaged due to increased truck traffic. (VFP_2548)

Response 15-12: As described in Chapter 15, “Construction,” of the EIS, trucks making deliveries to construction sites would primarily utilize truck routes such as Hempstead and Jamaica Avenues to travel to and from the Clearview Expressway and Long Island Expressway. These roadways are equipped to accommodate construction truck traffic. However, as part of the permitting and construction inspection processes, if warranted and if it is a result of the Proposed Project’s construction activities, NYAP would make any repairs deemed necessary by the governing agency, including those associated with adjacent roads on which a substantial level of construction vehicles would traverse during the Project’s construction.

Comment 15-13: Plainfield Avenue and other residential streets should not be used for truck routes associated with construction. (Culotta_2365)

Response 15-13: As described in Chapter 15, “Construction,” trucks making deliveries to construction sites are anticipated to enter and exit the Project Sites via Hempstead Turnpike at Gate 5 or Gate 14 and would primarily utilize truck routes such as Hempstead and Jamaica Avenues to travel to and from the Clearview Expressway and Long Island Expressway. Other truck trips, including deliveries from local businesses, would be expected to travel to and from points east via Hempstead Turnpike. Traffic volume maps for the 6:00 AM to 7:00 AM construction peak hour are presented in Appendix F, “Transportation,” of the FEIS. As presented in Chapter 15, construction activities associated with the Proposed Project during the
projected peak quarter of construction would result in significant adverse traffic impacts at three intersections during the 6:00 AM to 7:00 AM peak hour. Implementation of traffic engineering improvements such as the installation of new traffic signals at currently unsignalized intersections and modification of signal phasing and timing at currently signalized intersections would provide mitigation for all of the anticipated significant adverse traffic impacts at those locations. Implementation of the recommended traffic engineering improvements is subject to review and approval by NYCDOT. In the absence of the application of traffic mitigation measures during construction, these construction-period impacts would remain unmitigated or partially unmitigated.

Comment 15-14: What impacts will night work have on Hempstead Turnpike? (EAM_2563)

Response 15-14: As detailed in Chapter 15, “Construction,” of the FEIS, based on preliminary construction plans, temporary lane closures may be required along Hempstead Turnpike adjacent to the Project Sites to facilitate construction of one or more grade-separated connections between Sites A and B, utility connections, water main and gas main activities, and sidewalk improvement. The placement of the spans for a pedestrian bridge across the Hempstead Turnpike would be anticipated to require limited full lane closures in both directions; these closures would likely occur during the night. In these instances of temporary lane closures, Work Zone Traffic Control (WZTC) plans would be implemented to ensure minimum disruption to traffic or pedestrian flow.

Comment 15-15: Please provide the basis/back-up for the construction scheduling provided in “Anticipated Construction Schedule” (Figure 15-1 and Table 15-1), construction workers and truck trips provided in “Total Daily Construction Workers and Trucks by Quarter” (Table 15-2), and hourly projections provided in “2020 Fourth Quarter Daily Construction Vehicle Trip Projections” (Table 15-4). In addition, the Alternatives chapter mentions the proposed action would create 10,000 temporary construction jobs, however, these tables do not reflect this. (NYCDOT_2562)

Response 15-15: The requested backup has been provided to NYCDOT. The cited number of temporary construction jobs, which include direct and indirect jobs, are not comparable to the daily construction workers by quarter shown in Table 15-2. Estimates of jobs to be created by the Proposed Project as presented in the Socioeconomic Conditions and Alternatives chapters were independently produced using an inputs/outputs model (the RIMS II model of the Bureau of Economic Analysis) that employs multipliers relevant to the study area and surrounding communities. These
multipliers were used to produce estimates of full-time equivalent (FTE) indirect and induced jobs (both temporary and permanent) over the entire construction period; indirect and induced employment is generated off-site, and does not produce construction vehicle trips. Estimates of direct jobs were produced based on estimated construction costs of the Proposed Project, average wages obtained from the Bureau of Labor Statistics, and other benchmarks. In addition, an FTE construction job is the equivalent of one person working full time for one year, and does not equate to construction vehicle trip estimates by quarter.

Comment 15-16: Provide construction assignment maps for truck and worker trips separately. (NYCDOT_2562)

Response 15-16: This requested backup data has been provided to NYCDOT.

Comment 15-17: The construction chapter states that parts of the arena would be cast/fabricated off site and transported to the site. Please provide more details related to the size vehicles needed to transport to these pieces to the site, number of daily trips and how many months this activity of bringing prefabricated pieces to the site will be and whether these vehicles are expected to travel on NYC streets or if the trips are expected in Nassau County. (NYCDOT_2562)

Response 15-17: An average of six truck trips per day by 53 foot trailers is anticipated for an 18-month period. These trucks would use the George Washington Bridge to the Clearview Expressway (I-295) to the Long Island Expressway (I-495) to local truck routes in Queens and Nassau County. Any shipment of materials requiring oversized vehicles would comply with all applicable requirements related to routing, vehicle escort, etc. Road and/or bridge closures are not expected to be needed for any materials brought to the Project Site.

Comment 15-18: The construction chapter stated the following on DEIS page 15-22: Given that the amount of construction vehicle trips would be substantially lower than the volume of project-generated trips during operation of the Proposed Project, there would be substantially fewer intersections with potential significant adverse traffic impacts during the PM construction peak hour compared to the weekday PM peak hour analyzed for operation of the Proposed Project, and no new intersections would be expected to experience significant adverse traffic impacts during the peak quarter of construction. As such, detailed traffic analyses were not performed for the 5:00 PM to 6:00 PM construction peak hour. Please note the PM construction peak hour should be analyzed. Page 15-2 states “no new intersections would be expected to experience significant adverse traffic impacts during the peak quarter of construction”. The proposed action
was analyzed for 7-8 PM peak hour, therefore it is not comparable to the 5-6 PM peak hour which has higher background traffic volumes and different traffic operations. Furthermore, the proposed action is projected to generate 451 vehicle trips exiting 7:00 to 8:00 PM (3,810 entering trips) however the construction generates 554 trips. The analysis should consider whether the trips are entering or exiting, and therefore the operational peak and construction peak hours are not comparable. Additionally the document fails to identify mitigation measures for the PM construction period. The proposed action recommends TEAs, traffic signals, etc. Would the traffic signal be warranted during construction? If so, please provide the signal warrant study. Would TEAs be provided during construction? (NYCDOT_2562)

**Response 15-18:** The FEIS includes a detailed traffic analyses of the 5:15 PM to 6:15 PM construction period (see Chapter 15). The traffic signal warrant study has been included in the traffic backup data provided to NYCDOT. The signal meets Warrant 3 for 2017 existing and 2021 future build volumes, so it could be installed during construction. As discussed in Chapter 17, “Mitigation,” TEAs have not been proposed as a mitigation measure for the construction period.

**Comment 15-19:** The construction chapter states that 7AM – 5PM are typical construction hours, however other projects in NYC typically don’t consider a 5 - 6PM peak hour analysis for construction. Please confirm the hours of construction. (NYCDOT_2562)

**Response 15-19:** The hours of work described in Chapter 15, “Construction,” of the EIS have been confirmed with the Applicant.

**Comment 15-20:** Construction trucks are anticipated to enter and exit via Hempstead Turnpike. Please provide truck traffic impact analysis on Hempstead Turnpike for the construction trucks wishing to enter and exit the construction site along with the nearby street network, especially for the 5:00PM to 6:00PM peak hour. (NYCDOT_2562)

**Response 15-20:** The intersections of Hempstead Turnpike at Wellington Road and Locustwood Boulevard/Gate 5 Road have been added to the construction traffic analysis of the 6:00 AM to 7:00 AM construction peak hour. The EIS has also been revised to include detailed traffic analyses of the 5:00 PM to 6:00 PM construction period.

**Comment 15-21:** Please provide detour plans for trucks and incorporate adequate detour signage if a street or lane closure is necessary. (NYCDOT_2562)

**Response 15-21:** As described in Chapter 15, “Construction,” of the EIS, Work Zone Traffic Control plans would be prepared in instances of temporary lane
closures. The EIS has been updated to indicate that detour plans would be prepared in the event of a temporary street closure, such as during the placement of spans for a potential pedestrian bridge across Hempstead Turnpike.

**AIR QUALITY**

**Comment 15-22:** There is a concern that the project will have an adverse impact on air quality from construction vehicles. (Pelletiere_TS2_908)

**Response 15-22:** As detailed in Chapter 15, “Construction,” a mandatory emissions reduction program would be implemented for the Proposed Project to minimize the air quality effects of construction activities on the surrounding community. These requirements would include, to the extent practicable, dust suppression measures, use of ultra-low sulfur diesel (ULSD) fuel, idling restrictions, use of electrical equipment instead of diesel equipment, best available technologies, and the utilization of newer equipment. With these measures in place, and given the temporary nature of the construction activities, construction activities associated with the Proposed Project would not result in any significant adverse air quality impacts.

**Comment 15-23:** ESD should identify all potential impacts and mitigation regarding climate change during construction. ESD should identify mitigation measures like restricting idling time for vehicles, the use of diesel tools, etc. Construction activities should be limited to daytime hours and sound attention barriers should be installed where appropriate. Watering techniques should be implemented. (Culotta_2365)

**Response 15-23:** With respect to effects of construction on climate change, please see the response to Comment 14-9. As detailed in Chapter 15, “Construction,” to minimize the effects of construction noise, a 12-foot temporary noise barrier would be installed along the east side of the Site B construction site and construction hours would comply with the restrictions outlined in Chapter 144 of the Town of Hempstead Code (Unreasonable Noise) (i.e., between 7:00 AM and 6:00 PM on weekdays). However, it can be expected that, in order to complete certain critical tasks (i.e., finishing a concrete pour, erecting a crane, etc.), the workday may occasionally be extended beyond typical work hours and/or occur on the weekends. Pursuant to a requirement imposed by ESD, NYAP would require in its construction contracts that contractors implement a number of measures during construction to minimize potential impacts to nearby communities from ongoing construction, such as an air quality control plan that includes dust suppression measures, use of ultra-low sulfur diesel (ULSD) fuel, idling restrictions, use of electrical equipment instead of
Chapter 22: Response to Public Comments

diesel equipment, best available technologies, and the utilization of newer equipment.

NOISE AND VIBRATION

Comment 15-24: There is concern about potential construction noise impacts from the project. (Barley_045, Doherty_TS2_897)

Response 15-24: Chapter 15, “Construction,” describes the noise analysis that follows guidance from and assesses the potential for construction period impacts against the NYSDEC criteria. A number of measures would be implemented during construction to reduce potential noise effects, including the erection of construction barriers, location of noisy equipment away from sensitive receptor locations where practicable, early electrification, idling restrictions, proper maintenance of equipment, a commitment to use sheet pile installation equipment that is quieter than standard, and use of path control measures such as acoustic fabrics for certain dominant noise equipment to the extent practicable. However, even with the implementation of these measures, noise from construction was predicted at surrounding worst-case receptors and significant noise impacts were identified at residences to the east of Site B along Huntley Road, both sides of Wellington Road between Hempstead Turnpike and 109th Avenue, and the west side of Wellington Road between 109th Avenue and Hathaway Avenue.

For residences that do not have insulated glass windows, the Applicant would offer to provide and install laminated glass storm windows or replacement insulated glass windows for each window that faces the construction noise source. For residences that do not have alternate means of ventilation (i.e., air conditioning), the Applicant would offer to provide and install one through-window air conditioning unit for each room that has a window that faces the construction noise source to allow for the maintenance of a closed-window condition. A survey and in-field verification would be undertaken to confirm which residences would be eligible for this mitigation. With the provision of such measures, construction noise impacts at these receptors would be fully mitigated.

For the outdoor spaces (e.g., yards, decks) of the residences adjacent to Site B, there would be no feasible or practicable measures to mitigate the construction noise impacts. However, outdoor spaces could still be used without the effects of construction noise outside of the hours that construction would occur, i.e., during the late afternoon, night time, and on most weekends.

At all other locations, construction may be readily noticeable and potentially intrusive at times, but construction noise would not rise to the level of a significant impact.
Comment 15-25: There is concern over the potential noise effects from construction. The berm should be in place prior to construction. (Ferone_TS1_852)

Response 15-25: The Applicant has committed to having the berm on Site B in place prior to the start of construction of the retail village. The EIS construction noise impact analysis in Chapter 15, “Construction,” conservatively excluded the sound attenuation value of the berm.

The EIS analysis accounts for noise resulting from construction activity in the North Lot at nearby receptors including the Floral Park-Bellerose School (represented by receptors 2 and 2a). Although construction may be readily noticeable and potentially intrusive at times, the duration of the worst-case construction noise is limited. Therefore, as described in the EIS, North Lot construction activities would not result in any significant noise impacts at the receptors analyzed. As no construction noise impacts were identified at these receptors, mitigation was not necessary and the construction noise analysis does not include any benefit from a berm or wall at the North Lot.

Comment 15-26: Regarding the construction noise impacts on dormitories along the western edge of the stable area near Gate 5 Road, what would be done to mitigate this? (VFP_2548)

Response 15-26: Due to refinements in the Proposed Project’s construction activities, the construction noise analysis has been updated in the FEIS (see Chapter 15). While construction noise may be readily noticeable at times, due to the limited duration of worst-case construction noise levels, construction of the Proposed Project would not rise to the level of a significant noise impact at any Belmont Park dormitories.

Comment 15-27: Regarding DEIS p. 15-3, why is there no mention of the construction noise impact on the students at school (Floral Park-Bellerose School)? Also, DEIS p. 15-13 mentions the re-construction of the North and East Lots. When will this occur? It will have a significant impact on the students of the surrounding schools and residents. (VFP_2548)

Response 15-27: Chapter 15, “Construction,” of the EIS includes an analysis of potential construction noise effects on the Floral Park-Bellerose School. The school is represented by receptor 2 in the construction noise analysis, and the results are presented in Table 15-8. At the school, construction of the Proposed Project would produce maximum noise levels of approximately 63 dBA, which would result in an increase of up to approximately 7 dBA over existing levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the North Lot and would include bulldozers, excavators, dump trucks, and paving equipment, along with construction
Chapter 22: Response to Public Comments

truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 6 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for sensitive uses in accordance with NYSDEC criteria, and noise associated with construction of the Proposed Project would consequently not constitute a significant noise impact at this receptor.

Comment 15-28: To mitigate noise impacts, construction activities (especially pile driving) should be limited to daytime hours, and sound attenuation barriers should be installed where appropriate. Idling restrictions should be imposed on trucks and vehicles associated with construction activities. (Culotta_2572)

Response 15-28: As described in Chapter 15, “Construction,” all Proposed Project construction would comply with applicable restrictions, including Chapter 144 of the Town of Hempstead Code (Unreasonable Noise), which restricts construction activity (including pile driving) to the hours of 7AM to 6PM on weekdays. NYAP would commit to using sheet pile installation equipment that is quieter than standard pile driving equipment. Additionally, as described in Chapter 15, a 12-foot temporary noise barrier would be installed along the east side of the Site B construction site, where construction activity would occur closest to noise receptors. The EIS also describes the requirement according to New York State Environmental Conservation Law (ECL) that all vehicles would be prohibited from idling for more than 5 minutes, except when necessary to operate a loading, unloading, or processing device or other requirement for proper operation of the engine.

SAFETY AND SECURITY

Comment 15-29: Construction activity in the North Lot will have adverse effects on nearby school children, exposing them to strangers, noise, pollution dirt and debris. (Ferone_TS1_852)

Response 15-29: Construction workers are expected to work within the fenced-in Project areas, where the construction activities would take place. Chapter 15 includes a comprehensive analysis of noise and air quality during the construction of the Proposed Project. As described in Chapter 15, the noise analysis follows guidance from and assesses the potential for construction period impacts against the NYSDEC criteria. The analysis accounts for noise resulting from construction activity in the North Lot at nearby receptors including residences in Floral Park (represented by receptors 1, 3, and 4) and the Floral Park Bellerose School (represented by receptors 2 and 2a). Although construction may be readily noticeable
and potentially intrusive at times, the duration of the worst-case construction noise is limited. Furthermore, a number of measures would be implemented during construction to reduce potential noise effects, including the erection of construction barriers, location of noisy equipment away from sensitive receptor locations where practicable, early electrification, idling restrictions, proper maintenance of equipment, and use of path control measures such as acoustic fabrics for certain dominant noise equipment to the extent practicable. Therefore, as described in the EIS, North Lot construction activities would not result in any significant noise impacts at the receptors analyzed.

As noted in response to Comment 15-22, a mandatory emissions reduction program would be implemented for the Proposed Project to minimize the air quality effects of construction activities on the surrounding community. These requirements would include, to the extent practicable, dust suppression measures, use of ultra-low sulfur diesel (ULSD) fuel, idling restrictions, use of electrical equipment instead of diesel equipment, best available technologies, and the utilization of newer equipment.

COORDINATION WITH NYRA CONSTRUCTION AND OPERATIONS

Comment 15-30: Regarding the main racetrack closure period mentioned in the noise and vibration section - NYTHA was not aware of any plan to close the main track for such an extended period of time. Should the main track be closed for training in the fall and spring there would be a huge impact on safety. The number of horses stabled at Belmont doubles during the spring, summer, and fall. The training track is a high-traffic zone and is the site of the most accidents/injuries. Overcrowding could create a dangerous situation. Does the restricted use of the main Belmont track mean that it will be closed completely? Significant financial harm would be done to our industry if the Belmont spring and fall meets must be cancelled or moved to the Aqueduct. (Appelbaum_NYTHA_2546)

In its analysis of Future No Action conditions related to Construction (Chapter 15), the DEIS discusses NYRA’s planned renovations as though they were wholly separate from the Project, and without even mentioning the planned lighting renovation intended for night racing: Any changes to Belmont Park by NYRA are separate from the Proposed Actions and would be expected to occur even without the Proposed Actions. NYRA improvement activities would include the rebuilding of the existing outer dirt track and the two inner turf tracks within their current footprints in order to provide for greater safety, better drainage, and an improved irrigation system. A synthetic track may also be installed within the inner turf course. Though the DEIS purports to have assessed cumulative impacts related the NYRA’s planned renovations, the specific sections of
the DEIS plainly illustrate a lack of meaningful analysis. The DEIS cannot credibly analyze potential impacts of the Project without fully incorporating the impacts of NYRA’s planned renovations. (VFP_2547)

**Response 15-30:**

ESD and NYAP have been coordinating throughout the environmental review process to understand the potential for cumulative construction effects, and the EIS makes conservative assumptions about the potential for overlapping construction activities in its Chapter 15 assessment of potential impacts from construction. Since publication of the DEIS, ESD understands from NYRA that its schedule for Main Track improvements has changed; specifically, NYRA track improvement activities would begin in the fall of 2019, with completion of the inner turf tracks before the 2020 Belmont Stakes and the remaining work completed in time for the 2021 Belmont Stakes. According to NYRA, construction staging associated with the above-described improvements would be accommodated entirely within the infield of the Racetrack. There is currently no timeline for improvements specifically associated with night racing.

Neither NYRA’s planned track improvements nor NYAP’s proposed construction activities require full closure of the Main Racetrack or the Training Track. When construction activities overlap with horse training, NYAP and its construction team would coordinate with the horse training operators to adjust construction means, methods, and scheduling whenever possible to reduce the potential for adverse noise impacts. In addition, NYRA has the ability to maintain and operate three training facilities with training surfaces at Aqueduct, Belmont, and Saratoga; NYRA has indicated that they would be able to accommodate training requirements throughout construction. NYRA, in conjunction with NYAP, would ensure that there is constant communication with horse training operators to provide updated training/racing dates and times as soon as the information becomes available to ensure a safe and coordinated environment, keeping all informed of current training hours, post times, and possible track closures.

**Comment 15-31:**

There was no mention in the DEIS how this development will affect the horses at Belmont. The FEIS must include how this will affect their mental health as well as overall health. How will they handle the "significant adverse construction noise impacts" the DEIS proves? And all the added activity on the Belmont Park campus including additional people/vehicles, fumes, construction dust, additional lighting and possible explosions? (Alfonsi_2353)

**Response 15-31:**

Chapter 15, “Construction,” evaluates the potential for construction noise to affect horses, concluding that maximum noise levels could impact horses and impulsive and short-duration noise has the potential to elicit
startle reactions. According to NYRA, with the maintenance and upkeep required in the barn area on a daily basis, the horses currently stabled at Belmont are consistently exposed to similar construction vehicles and equipment that would be used during construction of the Proposed Project such as: dump trucks, loaders, excavators, dozers, trailers, front load garbage trucks etc., so they are familiar with the noises associated with said equipment. Nevertheless, when construction activities overlap with horse training, NYAP and its construction team would coordinate with the horse training operators to adjust construction means, methods, and scheduling whenever possible to reduce the potential for adverse noise impacts. In addition, NYRA has the ability to maintain and operate three training facilities with training surfaces at Aqueduct, Belmont, and Saratoga; NYRA has indicated that they would be able to accommodate training requirements throughout construction, although this may result in additional costs. NYRA, in conjunction with NYAP, would ensure that there is constant communication with horse training operators to provide updated training/racing dates and times as soon as the information becomes available to ensure a safe and coordinated environment, keeping all informed of current training hours, post times, and possible track closures. There is no blasting or other explosive activity that would occur on the site.

Comment 15-32: Concern about the proposed hotel construction next to the Belmont saddling paddock. How will the hotel be positioned? What measures will be taken to ensure that hotel activities, such as the arrival and departure of guests, work at the loading dock, or entertainment events, do not frighten the horses? Measures are necessary to ensure the safety of horses and handlers, and to protect the integrity of the sport. (Appelbaum_NYTHA_2546)

Response 15-32: NYRA, in conjunction with NYAP, would ensure communication with NYTHA leadership to ensure that Project activities do not frighten the horses, and to otherwise ensure the safety of horses and handlers. See also the response to Comment 15-31.

Comment 15-33: The DEIS on page 15-2 states “during the running of Belmont Stakes in 2020 and 2021, when both Sites A and B would be under construction, it is expected that parking for Racetrack attendees could be accommodated on-site, but vendors and staff may need to park at an off-site location and be bused to Belmont Park.” Please provide more details whether any off site locations will be within New York City, as well as buses traveling in New York City. (NYCDOT_2562)
Response 15-33: This location is not known at this time. This could only potentially affect two days over the course of construction and does not warrant an analysis in the EIS.

Comment 15-34: How will construction be coordinated with horse trainers and operations? (EAM_2563)

Response 15-34: The Developer and NYRA would actively coordinate construction activities in light of required horse training and racing operations. NYRA, in conjunction with NYAP, would ensure that NYRA is in constant communication with New York Thoroughbred Horse Association (NYTHA) leadership to provide updated training/racing dates and times as soon as the information becomes available to ensure a safe and coordinated environment, keeping all informed of current training hours, post times, and possible track closures. Please also see the response to Comment 15-31.

Comment 15-35: Horsemen and our workers need to have unfettered access to the backstretch via the surrounding streets, and access to the grandstand-side paring when they have horses competing at Belmont Park. It appears Gate 5 Road will be used for construction. This is the prime means for entry and egress to our property for our horsemen and patrons. Horsemen cannot be required to shuttle from a parking lot to the racetrack on these days, as they are required to be able to get from the barn area to the paddock in a timely fashion. (Appelbaum_NYTHA_2546)

Response 15-35: There would not be disruption to the horsemen. Most enter through Gate 6 which allows access to the barn area. There is egress from the barn area directly to the Horsemen’s lot adjacent to the Clubhouse, which is not in the scope of the Proposed Project. Gates 5, 7, and 8 would remain fully operational for backstretch workers, trainers, and horsemen to allow unfettered access to the facility. See also the response to Comment 15-31.

Comment 15-36: The DEIS states that the developers will “coordinate with the horse training operators to adjust construction means, methods, and scheduling whenever possible to reduce the potential for adverse noise impacts.” In order to address our concerns it is vital that NYTHA is included in the conversation of planning and coordination of the construction schedule. (Appelbaum_NYTHA_2546)

Response 15-36: NYRA, in conjunction with NYAP, would ensure constant communication with NYTHA leadership to provide updated training/racing dates and times as soon as the information becomes available to ensure a safe and coordinated environment. It is important to note that NYRA has the ability to maintain and operate three training facilities with training surfaces at Aqueduct, Belmont and Saratoga and
Comment 15-37: We want to remind all parties that over 1,000 of NYTHA employees are permanent residents of the property. Are emergency measures being developed to protect these residents should something unexpected occur, such as burst water lines, electrical outages, migration of pests, changes in water flow that could cause flooding, and others? (Appelbaum_NYTHA_2546)

Response 15-37: As the statement above details, Belmont Park is a facility that operates 365 days a year, through severe weather events, internal construction projects, and external infrastructure projects. NYRA has an emergency management plan in place that would be updated as needed and implemented to ensure the safety of all on-site. These safety measures are in place for both employees and horses. NYRA has stored bottled water, generators, pumps, tree trimming equipment and a full complement of heavy equipment required to respond to unforeseen events.

OTHER

Comment 15-38: Construction noise impacts will be longer than 2 years in duration. (EAM_2563)

Response 15-38: Chapter 15 describes the anticipated lengths of construction for various Project components, and the duration of impacts in the surrounding community. While the overall construction is anticipated to occur over an approximately 28-month period, no single location is expected to experience noise impacts for the full duration of construction.

Comment 15-39: When will construction documents on the entire project be released? (VFP_2548)

Response 15-39: The comment is not relevant to SEQRA or the UDC Act.

ALTERNATIVES

GENERAL

Comment 16-1: The alternatives presented in the DEIS do not constitute a “hard look” at alternative land use mixes. (EAM_2563)

The DEIS is flawed because it only has two alternatives. It needs to address the exclusion of all three major components, not just the "no-arena" option but a "no-hotel" alternative and a “no-megamall” alternative too. (McEnery_2340)

Response 16-1: SEQRA requires that an EIS consider a “no-action” alternative as well as a reasonable range of other alternatives. The EIS fulfills this requirement
and analyzes five alternatives to the Proposed Project. As described in Chapter 16, “Alternatives,” the alternatives selected for consideration in an EIS are generally those that are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of the action. The DEIS included a No Action Alternative, a No Unmitigated Impact Alternative, a No Arena Alternative, and an Alternate Site Plan Alternative. In addition, in response to public comment, the FEIS includes a fifth alternative—the “No Retail Village Alternative” that contemplates the Proposed Project but without the retail village on Site B (see response to Comment 16-2.

Comment 16-2: Consider an alternative that eliminates the hotel and mall, and relocates parking to Site B which is an adequate walking distance to the arena. This would reduce impacts from commercial vehicle traffic and would dramatically reduce project cost. (OHagan_053)

Consider an alternative that eliminates the retail proposed for Site B. (Alfonsi_2540, Carrig_TS4_987, Culotta_2365, McEnery_2340, McEnery_TS1_886, VFP_2548)

The assessment of project alternatives was artificially limited. The alternatives analysis blatantly avoids consideration of an obvious alternative – development of an arena without hotel, office, and “experiential” retail uses. When the NYAP proposal was announced, the dominant message to the public was that the proposal would provide a new, permanent home for the Islanders Hockey Team. The DEIS considers as an alternative what is essentially a mega-mall development without the arena, but does not consider an arena-only alternative. It is understood that an arena-only development would still generate significant traffic when events start close to peak traffic periods. Nevertheless, such an alternative would produce less traffic than the Proposed Project and could be fully accommodated (including parking) within the project development sites identified in the original RFP issued by ESD without relying on extensive encroachment and use of NYRA-controlled property. This was a significant oversight in in the DEIS. (VFP_2547)

Response 16-2: In response to public comments, the FEIS includes a “No Retail Village Alternative” that would develop the elements of the Proposed Project but without any retail on Project Site B. Under this Alternative, Site A would be developed with the same arena, hotel, office, “experiential” retail and food and beverage uses, community space, and open space as the Proposed Project. Project Site B would include approximately 2,600 parking spaces as well as publicly accessible open spaces.
Comment 16-3: Consider a new alternative that would eliminate the arena and reduce the mall size due to concerns about quality of life. (Gonzalez_TS1_847)

Response 16-3: Chapter 16 of the DEIS and FEIS includes an analysis of a “No Arena Alternative,” and the FEIS includes an analysis of a “No Retail Village Alternative.” Conditions under these alternatives are compared with conditions in the future with the Proposed Actions. In addition, the Proposed Project has reduced the amount of Site B retail from 350,000 gsf to 315,000 gsf.

Comment 16-4: ESD should consider reasonable and feasible alternative location for the arena such as Ronkonkoma, New York and the Nassau Coliseum. (Culotta_2365)

Response 16-4: Site selection for an arena is not the subject of this EIS. This EIS considers the environmental impacts of redevelopment of the Proposed Project within Belmont Park and alternate development scenarios within Belmont Park. See also the response to Comment 1-37.

Comment 16-5: No alternative plan has been proposed. (Smith_2570)

Response 16-5: Please see Chapter 16, “Alternatives,” for an analysis of various alternatives to the Proposed Project.

Comment 16-6: Reduced density is dismissed outright without detailed analysis. (EAM_2563)

The document does not evaluate a scaled-down option for the site that would reduce the traffic impacts. Without this the DEIS is incomplete. (BPCC_132)

Response 16-6: Chapter 16, “Alternatives,” of the DEIS and FEIS includes an analysis of a “No Unmitigated Impact Alternative” which considers the level of development that would not result in any identified significant adverse impacts that could not be fully mitigated. As detailed in Chapter 16, because of existing congestion and physical constraints at the intersection of Hempstead Avenue at Springfield Boulevard, even a minimal increase in project-generated traffic would trigger a significant adverse traffic impact that could not be fully mitigated. Thus, no reasonable alternative could be developed to completely avoid unmitigated traffic impacts without substantially compromising the stated goals of the Proposed Actions. Additionally, any development on Project Site B that would require excavation and foundation construction would have the potential to result in unmitigated significant adverse construction noise impacts. To eliminate all unmitigated significant adverse impacts, the Proposed Project would have to be reduced in size or modified to a point where it
would not meet the State's development objectives for the Project Sites. Accordingly, there is no viable unmitigated impact alternative.

The DEIS also included a “No Arena Alternative,” and the FEIS includes an analysis of a “No Retail Village Alternative;” both of these alternatives represent reduced density, and conditions under these alternatives are fully analyzed and are compared with conditions in the future with the Proposed Actions.

**Comment 16-7:** While one of the alternatives was the No Arena Alternative, a scaled down alternative with less commercial space (with and without the arena) with additional open space was not presented. Given the large commercial component to the Proposed Project, this Scaled Down Alternative(s) make sense. Tables should be prepared comparing traffic impacts with a scaled-down commercial component alternative(s) and the No Arena Alternative and the Proposed Action. (Curran_2564)

**Response 16-7:** As detailed in response to Comment 16-2, the FEIS includes a new “No Retail Village Alternative” without retail development on Site B. This alternative includes a quantitative traffic analysis and comparisons to the Proposed Actions.

**Comment 16-8:** Please provide the alternative chapter back up materials including trip generation by land use and site, assignments by land use and mode, analyses, etc. (NYCDOT_2562)

**Response 16-8:** This requested backup has been provided to NYCDOT.

**Comment 16-9:** Please provide tables summarizing the proposed mitigation measures and mitigation LOS for all peak hours [for alternatives], as well as provide the back-up materials necessary to review the proposed mitigation measures. (NYCDOT_2562)

**Response 16-9:** The requested backup data has been provided to NYCDOT.

**Comment 16-10:** Please clarify the number of parking spaces to be provided under the alternatives analysis. (NYCDOT_2562)

**Response 16-10:** The FEIS text has been updated to clarify the number of parking spaces to be provided.

**NO ACTION ALTERNATIVE**

**Comment 16-11:** Please justify not including night racing in the No-Action condition. (NYCDOT_2562)

**Response 16-11:** As described in Chapter 11, “Transportation,” of the FEIS, “Vehicular trips associated with night horse racing have not been included in the No Action traffic analysis because if night racing is authorized, night racing
would not occur at the same time as a hockey game.” The exclusion of
night racing from the No Action condition is also more conservative
because the With Action condition is compared to a No Action condition
that does not include vehicle trips associated with night racing. The
potential cumulative effects of night racing were addressed in Chapter 21,
“Cumulative Effects.”

Comment 16-12: We support the No Action Alternative to the Belmont Park
Redevelopment Program, or adding an alternative of green open space to
the DEIS. (Weiner_SSAS_2097)

Response 16-12: Comment noted.

NO UNMITIGATED IMPACT ALTERNATIVE

Comment 16-13: The DEIS also mentions ESD will consider a “No Unmitigated Impact
Alternative” which is “an alternative program that would avoid or reduce
impacts that cannot be fully mitigated.” That alternative is eliminate the
retail mall and renovate the train station. Please I ask you to “consider”
and study this alternative. (Alfonsi_2540)

Response 16-13: In response to public comment, a No Retail Village Alternative has been
added to the alternatives assessment and is included in Chapter 16 of the
FEIS (see response to Comment 16-2) and a new LIRR Elmont Station
on the Main Line is included as Mitigation (See Chapter 17 of the FEIS).

NO ARENA ALTERNATIVE

Comment 16-14: The peak hours for the No-Arena alternative differ from the proposed
action, which is selected based on Arena event times, and not the peak of
the background traffic. The peak hours for alternatives should be
analyzed in order to provide an accurate comparison of the action versus
the alternatives impacts mitigation measures. Also, subtracting out the
arena trips is not the only difference in trip generating characteristics,
since a trip generation credit was taken for arena patrons at the other uses
proposed for site A, which should be added back into the trip generation
calculations for the No-Arena Alternative. (NYCDOT_2562)

Response 16-14: The EIS has been updated to address the peak hour trips for the No Arena
Alternative. The trip generation for the No Arena Alternative excluded
internal trip capture between the arena and retail.

ALTERNATE SITE PLAN ALTERNATIVE

Comment 16-15: The Alternate Site Plan Alternative indicates that Site Plan Option 1
would locate all of the proposed retail uses on Site A with the proposed
arena, hotel, and office uses. If that is the case, how would Site B be
utilized if the “retail village” was not included? (Curran_2564)
Chapter 22: Response to Public Comments

Response 16-15: In the Alternate Site Plan Alternative, Site B would include: approximately 10,000 gsf of community space; approximately 6.1 acres of publicly accessible open space; and approximately 2,360 spaces of at-grade parking. This is shown on Figure 16-1 of the EIS. In addition, the FEIS includes a new alternative without retail development on Site B. In this alternative, Site B would primarily be used for parking.

OTHER

Comment 16-16: A grocery store with fresh produce, healthy foods would be a better fit for the community. (Higdon_TS2_923, Marinacci_TS4_998, Praino_TS3_946, Schlechter_TS3_943, Sferlazza_2263)

Consider an alternative that brings in high-tech jobs, STEM jobs, and/or provides job training. (Sexton_TS4_1028, Thompson_TS4_1002)

A grant should be provided to allow the property to be used as an experimental facility to transform it into a 100% green property. (Moriarty_2144)

Response 16-16: With the exception of job training through the proposed community space, the Proposed Project does not anticipate the above-described uses, and they do not represent “alternatives” as analyzed under SEQRA. As described in Chapter 16, alternatives selected for consideration in an EIS are generally those that are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of the action. As detailed in response to Comment 16-1, the EIS analyzes five alternatives to the Proposed Project.

MITIGATION

GENERAL

Comment 17-1: Vision Long Island has concerns about the suitability of the site as the potential development plan does not appear to adequately mitigate the potential negative impacts it is likely to generate. (Alexander_TS1_887)

If the plans move forward, plans must be established that will mitigate the impacts of the surrounding areas. (Bosworth_2100)

I have concern because traffic is a nightmare but hope that the project team will work with the Town to devise mitigating strategies. (Swaby_TS1_885)

The DEIS proposes inadequate traffic mitigation. (Weiner_SSAS_2097)

The Final Environmental Impact Statement must demonstrate true mitigation of the many “significant adverse impacts” of this Proposed Project, especially in the areas of Scope and Transportation, before the
Proposed Project commences. One of the primary features of this mitigation planning must surely be to scale down the Proposed Project, especially the ill-advised shopping mall. (Pombonyo_2398)

The current plan has problems with traffic and other adverse impacts that cannot be mitigated. (Smith_TS1_889)

The DEIS does not advance adequate mitigation measures to address the potential impacts to the local communities. (Alexander_TS1_887, Bosworth_2100, EAM_2563, Heeb_TS4_1017, Pombonyo_2398, Madden_TS3_956)

Response 17-1:

Chapter 17, “Mitigation,” details measures to reduce or eliminate to the maximum extent practicable identified significant adverse environmental impacts that could result from the Proposed Project, including impacts at intersections located in the neighboring communities. This document responds to public comments on specific Project impacts and proposed mitigation measures.

Specific to identified transportation impacts, the FEIS incorporates and quantifies the benefits of two major mitigation initiatives that were either unknown at the time the DEIS was published or which were not advanced in sufficient detail for its benefits to be quantified at that time. The first is that the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, as demanded by numerous members of the public and local elected officials during the public review process. The second is the preparation of a comprehensive, detailed TMP including several strategies aimed at reducing private automobile travel demand during peak traffic hours before and after arena events. The proposed mitigation measures advanced in the FEIS would reduce the level of additional congestion on the Cross Island Parkway by eliminating all of the unmet demand in both the northbound and southbound directions during the weekday PM peak hour and in the southbound direction during the Saturday PM peak hour. The proposed mitigation measures would also substantially reduce the unmet demand in the northbound direction during the Saturday PM peak hour, and the use of demand management strategies in the TMP could further reduce or eliminate the remaining unmet demand by redirecting some of the arena patrons to approach the Project Sites via the southbound direction of the parkway by using a partnership with a navigation app provider.

Since the arena is the primary generator of vehicular traffic, especially for sold-out hockey games, the emphasis of the mitigation planning has been on promoting transit and reducing auto demand during pre-event arrival hours and post-event departure hours. While the proposed retail village is a significant generator of traffic, it is not the primary generator.
Nevertheless, in response to public comments on the DEIS, the maximum amount of retail for the Project Sites has been reduced from 435,000 gsf as reported in the DEIS to a maximum of 350,000 gsf; the maximum amount of retail that would be allowed on Site B (the retail village) is now 315,000 gsf.

**Comment 17-2:** Mitigation is not entirely developed, several mitigation measures do not seem to mitigate impacts. Identified noise mitigation is not practicable. (EAM_2563)

A more realistic, comprehensive public transit plan is needed to alleviate the traffic impacts. That should include a full service LIRR station. (EAM_2563, Kaplan_TS4_967, Kaplan_2550)

**Response 17-2:** With respect to identified transportation impacts, the FEIS provides substantial additional details, refinements, and a fully quantified evaluation of the TMP that was outlined in the DEIS, plus a full evaluation of the benefits of the new, full-time Elmont Station on the Main Line that would serve the Proposed Project. The ability of these proposed improvements plus additional traffic engineering improvements to mitigate projected impacts to the extent practicable is fully detailed in Chapter 17, “Mitigation.”

With respect to temporary construction noise impacts identified in the EIS, the FEIS advances proposed mitigation measures to fully mitigate interior noise levels. See also the response to Comment 17-84.

A Memorandum of Environmental Commitments (MEC) would identify all such obligations and would be a covenant under the transaction documents. The MEC would include default provisions and procedures for enforcement.

**Comment 17-3:** ESD has acknowledged certain impacts, but the proposed mitigation is woefully inadequate and in other cases, ESD was just predicting no impact and this is frankly disingenuous. There will be a 28-month construction disruption concurrent with Third Track construction. (Browne_TS1_853)

**Response 17-3:** Additional text has been included in Chapter 15, “Construction,” to discuss the potential cumulative effects of the Proposed Project with the LIRR Expansion (Third Track) Project. As described in the FEIS, the two projects are more than 3,000 feet (over ½-mile) apart and the cumulative construction effects of these two projects are estimated to be minimal.

**Comment 17-4:** The current proposal is possibly the maximum potential development that could be accommodated on the site and does not appear to adequately mitigate the potential negative impacts. (VLI_2125)
Response 17-4: The FEIS presents a significant new mitigation measure—the LIRR has developed plans for the creation of a new full-time Elmont Station on its Main Line that would serve arena patrons using the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches, and thus provide direct service to Nassau and Suffolk Counties, in addition to running trains to the Belmont Park Station on the spur. This is expected to generate a significant shift of auto trips to LIRR and help reduce potential adverse traffic impacts. This is discussed in Chapter 17, “Mitigation,” of the FEIS, which also describes and evaluates the components of the TMP that are aimed at reducing automobile traffic, especially for pre-event and post-event conditions at with sold-out events at the arena. Unmitigated significant adverse impacts would remain in the areas of transportation and construction noise. These significant adverse impacts cannot be fully mitigated while still allowing the Proposed Project to meet the State’s development objectives for the Project Sites.

Comment 17-5: Much of the proposed mitigation is outside of the Applicant and sponsor’s control. How are these mitigations guaranteed to be implemented? Who would fund the necessary mitigation? (EAM_2563)

Who is in charge of the TMP and who will follow up with the Applicant to make sure that they fulfill their obligations of the traffic mitigation? How would this be enforced? (Greene_TS3_944, Gunther_TS1_865, Gunther_2344)

The state needs to mitigate before the arena, hotel, and retail megamall are allowed to operate. (McEnery_2340)

Response 17-5: As noted in the response to Comment 1-122, a Memorandum of Environmental Commitments (MEC) would identify all such obligations and would be a condition of the lease. The MEC would include default provisions and procedures for enforcement. The Applicant is responsible for funding the mitigation measures.

Through the MEC, ESD would require the Applicant to implement the proposed mitigation measures. The timing of those requirements would be established to maximize their effectiveness. For example, construction of the proposed retail village on Site B would not proceed before construction of the Site B vegetated buffer.

Comment 17-6: NYRA has planned improvements to the Belmont Grandstand and other improvements in the park. This is not mentioned in the DEIS. Why does ESD believe that this would not have overlapping or cumulative effects? (VFP_2548)

Response 17-6: NYRA’s planned improvements were described and considered in the DEIS, and the FEIS presents the most current understanding of NYRA’s
planned improvements based on recent ESD correspondence with NYRA representatives. The FEIS makes conservative assumptions regarding the potential for overlap between NYAP and NYRA construction activities, and also considers potential effects of NYAP construction activities on NYRA’s regular operations. FEIS Chapter 15, “Construction,” describes anticipated overlaps in construction between NYAP and NYRA.

Comment 17-7: ESD may not be able to mitigate the adverse traffic and resulting air quality impacts, but it can scale back the intensity and severity of the traffic and related air quality, noise, and safety and security impacts by scaling back the scope of the project, especially the shopping mall. (Culotta_2572, Pombonyo_2398)

Response 17-7: Chapter 16, “Alternatives,” of this FEIS includes a “No Retail Village Alternative.” The assessment of this alternative finds that it would not substantially avoid or reduce Project-related significant adverse traffic impacts.

Comment 17-8: The DEIS highlights significant adverse traffic impacts that are unavoidable. (Alfonsi_TS3_953)

Response 17-8: Comment noted.

TRANSPORTATION

Comment 17-9: Belmont development is a good thing. However, this plan does not provide appropriate transportation infrastructure improvements. (Madden_TS3_956)

Response 17-9: Between publication of the DEIS and FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via stations along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches). This major infrastructure improvement alone is estimated to divert thousands of arena patrons from using their cars to public transportation. In addition, there would be a new traffic signal at the intersection of Hempstead Avenue and the Cross Island Parkway northbound off-ramp and bus pull-outs and bus shelters would be provided on Hempstead Turnpike, as detailed in Chapter 17, “Mitigation” of the FEIS.

Comment 17-10: The DEIS does not satisfactorily address traffic impacts. Proposed mitigation via traffic controls such as signals and turn prohibitions will not solve the traffic problem. Adjustments to bus service will add vehicles to that congestion. Nothing has been done to address these issues and, in
fact, have only been exacerbated by the expansion of the use of more land at Belmont Park for this project. The TMP is also inadequate to solve the traffic problem. (Brown_TS2_928, EAM_2563, Gribbins_2070, Gunther_TS1_865, Lee_TS1_878, Longobardi_TS4_1029, Moy_148, Pombonyo_TS2_917, Ra_2571, VLI_2125, Weiner_SSAS_2097)

Response 17-10: Between publication of the DEIS and the completion of this FEIS, the TMP described in the DEIS has also been further developed, refined, and quantitatively evaluated (see Chapter 17 and Appendix J). A primary mitigation described is that the LIRR has developed plans for the creation of a new full-time Elmont Station on its Main Line that would serve arena patrons using the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches, and thus provide direct service to Nassau and Suffolk Counties, in addition to running trains to the Belmont Park Station on the spur, and provide substantial new train capacity that is projected to more than double the LIRR mode share for sold-out events at the arena. The quantitative assessment of the TMP in this FEIS describes the amount of traffic that is estimated to be shifted from autos to rail and also from autos to higher occupancy shuttle buses and charter buses, and from pre-event peak arrival hours of the day or to different hours, and from the Cross Island Parkway to other north-south limited access highways (but not to local streets). Standard traffic engineering improvements such as intersection geometric improvements, installation of a new traffic signal, and signal timing improvements would also assist in mitigating traffic impacts but would not be relied on by themselves.

Comment 17-11: Even with your current plans, which you state, “are currently being evaluated and reviewed”, the overall size and magnitude of this project has grown so big that it will drastically negatively affect the surrounding communities. Our local roads, highways and infrastructure will not be able to handle the volume of vehicles and visitors that project hopes to attract.

The DEIS presents a traffic analysis that has serious flaws but nevertheless reveals that the project will cause severe unmitigated impacts in local communities. Floral Park’s traffic consultant, NV5, identified a basic failure in the DEIS: the DEIS identifies a number of locations which are above capacity and mitigation is considered infeasible; it fails to consider a mitigation alternative where the intensity of the development is reduced, such as reducing or eliminating components of the project. (VFP_2547)

Please figure out a way to mitigate the traffic problem. There is concern about potential increases in traffic. What is proposed to address the potential traffic impacts? (Conterelli_017, Dasrath_MTA_2196, Mittler_1053, Spina_085)
Response 17-11: Chapter 17, “Mitigation,” details and comprehensively evaluates the three broad components of traffic mitigation: 1) development of plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, and which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur; 2) implementation of a comprehensive TMP including a set of demand management strategies aimed at reducing the volume of project-generated peak hour vehicular trips, changing travel patterns to redistribute traffic away from critical highway segments, and shifting demand from auto to alternate modes of transportation, and would be the subject of an on-going monitoring plan and reported to a group of local and regional agency stakeholders, who would be able to make adjustments to the TMP as necessary; and 3) implementing traditional traffic capacity improvements such as intersection geometric improvements, signal phasing and timing improvements, and new traffic signals where appropriate. These three components would effectively reduce traffic demand and/or improve traffic operations and mitigate further identified significant adverse traffic impacts.

The DEIS considered a “No Arena Alternative” where the intensity of development is reduced, and based on public comments, the FEIS includes a “No Retail Village Alternative” where the intensity of development would be reduced as well. In response to public comments, the Proposed Project’s retail has been reduced from a maximum of up to 435,000 gsf to a maximum of up to 350,000 gsf.

Comment 17-12: Existing local streets are at or near capacity and cannot handle additional trips generated by development especially without widening roads or other mitigation measures. The mitigation plan is appalling given concerns around traffic and safety impacts. A real traffic mitigation plan for our community, especially the CIP is needed. (Colgan_2542, Solages_TS4_995, Talty_TS2_929)

Response 17-12: Chapter 17, details and comprehensively evaluates the development of a new, full-time LIRR Elmont Station on the Main Line, implementation of a comprehensive TMP including a set of demand management strategies aimed at reducing the volume of project-generated peak hour vehicular trips, and standard traffic engineering and operational improvements. It is neither practical nor reasonably feasible to widen the Cross Island Parkway. Therefore, the focus of mitigation planning vis-à-vis the Cross Island Parkway has been to reduce the traffic demand during peak pregame and postgame hours for sold-out games at the arena via a
range of strategies detailed and evaluated in Chapter 17, “Mitigation.”
The effectiveness of each component of this TMP would be monitored
by a full-time transportation manager and communicated to a group of
stakeholders such as transportation agencies, police departments, and
local municipalities, who would be able to make adjustments to the plan
in order to make its components more effective.

Comment 17-13: Any final project must be conditioned upon a traffic study of local roads
and concurrent restructuring of traffic patterns to deal with truck traffic
and overcrowding in each community and all streets leading to the
proposed venue. (Comrie_104, Comrie_134)

Response 17-13: The DEIS included a comprehensive traffic study of the local street and
highway network during weekday and weekend time periods with and
without sell-out events at the arena, and identified improvements needed
to mitigate significant adverse traffic impacts on the local street network
along with a TMP aimed at reducing projected traffic demand on both the
Cross Island Parkway and targeted local streets. The FEIS has further
developed and refined the TMP, including a quantitative assessment of
the expected benefits of the plan, as well as the substantial benefits of the
LIRR’s plans for the opening of a new, full-time Elmont Station on the
Main Line as requested by numerous elected officials and members of the
community during the public review process. This is a major action
towards maximizing mass transit usage to the Project Sites, reducing
traffic on the Cross Island Parkway, and thus minimizing the potential for
traffic diversions onto local streets.

Comment 17-14: ESD mentions the need for a comprehensive TMP. Where is that plan?
The TMP provides only potential solutions and the potential benefits of
mitigation are still unknown. The TMP should be revised to identify all
feasible alternative solutions to mitigate potential impacts. ESD should
provide it to the public as part of the DEIS so that the public can review
it and comment upon it. How can a plan that has not yet been established
be considered a reasonable mitigation measure? (Caldon_TS2_910,
Culotta_2365, Curran_2564, EAM_2563, Sexton_TS4_1028,
VFP_2548, Weiner_SSAS_2097)

Response 17-14: A detailed description of the TMP was provided in Chapter 17,
“Mitigation,” of the DEIS, and has been further developed, refined, and
quantitatively evaluated in the FEIS (see Appendix J). The TMP includes
appropriate demand management strategies that could reasonably be
implemented. It has been shared with, and reviewed by NYSDOT,
NYCDOT, and NCDPW (see Appendix M). Each of these three
transportation agencies would serve as stakeholders and review
monitoring plan reports produced regularly by the full-time transportation
manager and contribute to modifications of the TMP, when and if needed to maximize the effectiveness of the TMP.

Comment 17-15: The mitigation proposed does not appear to be adequate for the significant adverse transportation impacts. Solutions such as the proposed TMP are anecdotal and do not provide assurances that proposed traffic can or will be mitigated adequately. Instead of engineered solutions, the mitigation claims that technology will alter the travel behavior of existing and anticipated trips. This claim is overly ambitious and unsubstantiated. Concrete traffic mitigation measures should be identified before this environmental impact statement is approved. (Baggott_2331)

Response 17-15: The traffic engineering improvements identified in the EIS were able to mitigate the significant adverse traffic impacts on the local street network with the exception of two intersections. However, there were no physical improvements available to address significant impacts on the Cross Island Parkway since widening the parkway is neither practical nor reasonably feasible. A set of demand management measures were recommended in the DEIS, aimed at reducing the traffic volume demand on the Cross Island Parkway in lieu of the inability to increase its capacity. Since the DEIS, the TMP has been further developed, refined (see Chapter 17, “Mitigation” and Appendix J of the FEIS), and is not merely anecdotal, but quantitative and does draw on the successful experiences at other sports venues. It does not rely on just technology, but also relies significantly on a new, full-time Elmont Station on the LIRR Main Line that would directly serve arena patrons from Nassau and Suffolk Counties and provide more frequent service to and from points west, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur.

Comment 17-16: Instead of identifying and fully assessing measures to mitigate those understated impacts, the DEIS summarily concludes the problems will be addressed later through a traffic management plan.

The DEIS 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 intersection, temporary one-way street 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. (VFP_2547)

Response 17-16: The DEIS did not rely on the development of future measures as mitigation for Project-generated impacts. Between publication of the
DEIS and the completion of this FEIS, the TMP was further developed and refined, and its effectiveness has been quantitatively evaluated (see Chapter 17, “Mitigation,” and Appendix J). Chapter 17 evaluates the benefits and potential impacts of specific TMP actions such as adding shuttle and charter buses to the local street network instead of hundreds of private cars.

Comment 17-17: SEQRA does not permit a Lead Agency to postpone consideration of measures to mitigate severe traffic impacts by promising to develop a Traffic Management Plan in the future.

The DEIS fails to identify meaningful mitigation measures (mostly minor signal timing changes) to address traffic related impacts on local streets. The assumption that only 3 percent to 5 percent of the vehicles will access the site from the local street network is not correct so 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. (VFP_2547)

Response 17-17: The DEIS did not defer consideration of mitigation measures designed to address significant adverse impacts identified in that document. As noted in the DEIS and detailed in the FEIS, a TMP, which considers measures to mitigate significant traffic impacts, has been further developed, refined, and quantitatively evaluated. The TMP would be implemented upon Project approval along with a monitoring plan that is one of its three components, as described in Chapter 17 and included as Appendix J. The TMP would be subject to regular reviews by a stakeholder group comprised of representatives of affected transportation agencies, emergency responders, local municipalities, ESD, NYAP, and the arena’s full-time transportation manager.

The EIS has identified local street intersection improvements including intersection geometric improvements to add a left turn lane at eastbound Hempstead Turnpike onto Locustwood Boulevard/Gate 5 Road, installation of a traffic signal at the intersection of Hempstead Avenue and the Cross Island Parkway northbound off-ramp, the deployment of traffic enforcement agents, and signal timing adjustments. The comment that only three to five percent of vehicle traffic would access the site from the local street network is not correct; the correct number is approximately 10 percent.

Comment 17-18: There was no quantitative hard look at how or if the TMP measures would actually apply at Belmont. Some of the mitigation (a transportation management plan) is still being developed, so its benefits (if any) cannot be quantified or relied upon. There are multiple statements of “a plan will
be developed, and could” benefit somehow, but the statements are not substantiated. (EAM_2563)

Response 17-18: The TMP has been further developed, refined, and quantitatively evaluated within Chapter 17, “Mitigation,” and is documented in full within Appendix J. Implementation of the TMP and on-going monitoring of the effectiveness of each of the components of the TMP would be a commitment made by ESD and NYAP conditioned upon the approval of the Proposed Project, and would be regularly reviewed by a stakeholder group comprised of representatives of affected transportation agencies, emergency responders, local municipalities, ESD, NYAP, and the arena’s full-time transportation manager.

Comment 17-19: The DEIS fails to identify the adverse effects triggered by the proposed TMP itself. For example, it identifies background traffic to avoid using the Cross Island Parkway, promoting diverting traffic from the Cross Island Parkway to local streets, but does not provide any substantial mitigation to address this traffic. (Gunther_TS1_865)

Concern that the plan to include diversionary signage on the CIP to advise motorists to plan alternative routes would bring traffic into local communities.

With regard to Transportation, the unanswered questions encompass, but are not limited to, the Cross Island Parkway and “diversionary signage” (i.e., “Plan Alternate Routes”) which will redirect traffic to our already congested local streets in Floral Park and the surrounding communities. (Pombonyo_TS1_862, Pombonyo_2398)

Response 17-19: The goal of the TMP is not to divert traffic onto local streets, but rather to reduce cars in favor of mass transit, and to divert an increment of non-event-related Cross Island Parkway traffic to other north-south limited access highways (i.e., Meadowbrook State Parkway, Wantagh State Parkway, Seaford-Oyster Bay Expressway) via east-west limited highways (i.e., Long Island Expressway, Northern State Parkway, Southern State Parkway) without using local streets or to travel at times other than in the periods immediately preceding or following an event. It is not anticipated that project-generated traffic would divert given the routes used to enter and exit the Project Sites given the design of the site plan, which is served by three interchanges on the Cross Island Parkway. The overall goal of the TMP is to get more people to use transit and carpool, reducing the amount of “unserved” vehicles (unmet demand) on the Cross Island Parkway and minimizing the potential for traffic diversions onto local streets. While only a small percentage of background traffic on the Cross Island Parkway is estimated to be
diverted, this strategy along with the other demand management strategies would serve to reduce traffic congestion.

**Comment 17-20:** Strategies aimed at changing driving behavior—like carpooling, working with WAZE and Google, encouraging attendees to arrive early and stay late, and transit incentives—will not work. (EAM_2563, Greene_TS3_944, Heeb_TS4_1017, Horn_TS4_982, Kaminsky_TS1_845, Sexton_048)

**Response 17-20:** The draft TMP contained in Appendix J includes case studies of where these types of strategies have been successfully implemented at other sports venues in the United States.

**Comment 17-21:** Has an agreement with WAZE been negotiated? Partnering with GPS services will not alleviate traffic. Waze and GPS will not send people on the CIP, but rather through local roads.

Shouldn’t it be assumed project-generated traffic would use alternate routes on their own or be diverted by navigation applications? As such, it should be assumed that more project-generated traffic would utilize local roads, particularly Elmont Road, Meacham Avenue and Franklin Avenue in traveling to/from the arena from the Southern State Parkway? (Braun_2348, Curran_2564, Gonzalez_TS1_847, Gunther_TS1_865, Mesnick_2237)

**Response 17-21:** Waze’s Global Events Partner program is an existing program and is used at 100 different venues. It is free. The benefits include the ability to route project-generated traffic to parking facilities and obtain real-time data for monitoring. NYAP has been in early discussions with Waze, including its ability to “label” sensitive local residential streets as "closed" or "unavailable" in order to not be viewed as "available" to traffic diversions even though they are not really physically closed. A street such as Elmont Road, for example, could be an ideal candidate for such designation if agreed upon by a stakeholder group that includes representatives of transportation agencies, local police and fire department officials, and the local municipalities.

As noted in the response to Comment 11-215, the majority of traffic originating from the south and southeast would approach the Project Sites by taking the westbound Southern State Parkway to the northbound Cross Island Parkway. The Proposed Project would be served by three interchanges on the Cross Island Parkway (Exit 26A, Exit 26B/C, and Exit 26D), two of which provide direct access to the parking facilities. Between publication of the DEIS and completion of the FEIS, the LIRR has developed plans for the opening of a new, full-time Elmont Station on the Main Line and a comprehensive TMP has been developed to
implement demand management strategies that would reduce the reliance on private auto use by arena patrons. As detailed in Chapter 17 and Appendix J of the FEIS, the projected effects of these measures would substantially eliminate or reduce unmet demand on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets.

Comment 17-22: Redistributing vehicle traffic away from the peak arrival and departure hours for the arena events will not work for the patrons of the mall and the locals trying to get around their own town. The main roads in the areas besides the Cross Island Parkway are either one or two lanes of travel in each direction. I assume redirection means shutting down those roads for local traffic so that you can get these vehicles out of the arena parking. I would like to have a better explanation on how and where you will redirect that vehicular traffic. (Greene_TS3_944)

Response 17-22: As described in Chapter 17, the demand management measure to redistribute vehicular traffic away from the peak arrival and departure hours for arena events is a strategy for getting some of the arena patrons attending events to arrive early to the Project Sites prior to an event or depart the Project Sites later after an event, which would reduce the amount of vehicle trips generated by arena patrons during the peak arrival and departure hours. The objective of this strategy is to spread out the arrivals and departures of arena patrons and is not intended to change the travel patterns of retail village patrons or local residents. This strategy also would not involve shutting down roadways to local traffic.

Comment 17-23: ESD mentions the possibility of carpooling as mitigation, but it does not describe how carpooling would work, how it would mitigate the impacts from thousands of new vehicles traveling through residential streets, and the feasibility of arena patrons even deciding to do it. ESD should further discuss this mitigation measure in a Supplemental DEIS.

Who would be responsible for developing and implementing the carpooling and shared ride program? The suggestion of carpooling is crazy. Carpooling and ridesharing is not likely to make a huge improvement with the traffic.

Carpooling and off-site parking lots will only increase the traffic in Floral Park and surrounding areas. (Alexander_TS1_887, Cuite_TS4_984, Culotta_2365, Curran_2564, Martinez_TS2_896, Mesnick_TS1_870, Mesnick_2237, VLI_2125)

Response 17-23: Increased carpooling—with incentives such as preferential parking closer to the arena—is one of several demand management strategies that are part of the TMP that has been developed for the arena along with a new
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

full-time Elmont Station on the LIRR Main Line and other strategies to reduce arena peak hour auto traffic and promote transit use. Besides the implementation of a new LIRR Elmont Station, each of the other measures is aimed at converting modest percentages of auto users to carpools, charter or shuttle bus use, which, when totaled together, would be a significant shift to transit and/or to higher average vehicle occupancies. This has been fully documented in Chapter 17, “Mitigation” and in Appendix J, and is supported by the affected local public transportation agencies; a Supplemental DEIS is not needed.

NYAP would be responsible for developing and implementing the carpooling and shared ride program. A draft copy of the TMP is included in Appendix J, which provides further details of the roles and responsibilities of NYAP and other stakeholders.

Carpooling, by definition, increases the number of people in a car together and thus reduces the number of cars; while off-site parking lots, which includes people driving to remote park-and-ride locations and then taking shuttle buses to the arena, would also reduce the number of vehicles driving to the Project Sites. Both would decrease, not increase, traffic generated through Floral Park and its immediate surrounding areas.

Comment 17-24: Expecting the Islanders fan to stagger times of arrival and departure times is totally insane. People will not be able to arrive early to events. What is the basis for conclusion that this would work? Encouraging attendees to arrive early and stay late can contribute to intoxicated drivers at night. (Colgan_2542, EAM_2563, Mesnick_TS1_870, Mesnick_2237, Pelletiere_TS2_908)

Response 17-24: Providing incentives to people to arrive early and/or stay late for arena events is just one of several strategies that would be promoted as part of the TMP; please refer to Chapter 17, “Mitigation,” for a detailed presentation and evaluation, including examples of where these strategies have been successfully implemented at other venues.

Drunk driving is illegal and is expected to be enforced appropriately by the local police agencies. The Proposed Project would be served by public transportation and rideshare services that would provide an alternative for arena patrons from driving themselves.

Comment 17-25: The arrive early/leave late mitigation effort must not include tailgating or loitering in the parking lots. Also, the effort must have on-site law enforcement. (VFP_2548)

Response 17-25: On event days, NYAP would provide a security presence in each parking lot. On non-event days, NYAP would provide regular patrols by on-site
security guards in the parking lots. NYAP would have security personnel, signage, and Closed-Circuit Television (CCTV) to monitor and enforce all parking lot regulations, including prohibitions against tailgating and celebratory honking. See also the response to Comment 1-86.

Comment 17-26: The progression and implementation of this or any other mitigation strategy involving greater use of LIRR facilities requires consultation with LIRR to ensure that such strategy does not adversely impact LIRR customers or commuter rail service, and to identify an appropriate third-party funding source. LIRR has been advised that ESD and NYAP intend to engage in such consultation as the environmental review proceeds. (Betty_LIRR_2176)

Response 17-26: ESD has been in regular consultation and coordination with the LIRR throughout the public review process to ensure that both maximum transit opportunities are provided to the Project Sites and that such strategies do not adversely impact LIRR customers or commuter rail service.

Comment 17-27: The traffic analysis must account for the proposed increase in bus service on local roadways. (Weiner_SSAS_2097)

Response 17-27: The FEIS’ mitigation analyses include the effects of the TMP, including the replacement of hundreds of private automobiles with shuttle buses and charter buses on the intersections analyzed within the local street network.

Comment 17-28: The DEIS fails to account for the impact of bus traffic, including shuttle buses, to the residential community. (Gunther_2344)

Response 17-28: Existing buses are included in the traffic counts and the traffic analysis. Shuttle and charter buses have been included as one of the demand management strategies in the TMP and these are accounted for in the transportation analysis in FEIS Chapter 17, “Mitigation.”

Comment 17-29: How does the TMP provide accommodations for a potentially significant number of buses arriving and departing the site, as well as within the proposed internal roadway network of the site?

Response 17-29: The draft TMP found in Appendix J includes an Operating Plan that provides further details regarding the accommodations provided for
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

charter, coach, and shuttle buses accessing the Project Sites as well as their on-site circulation.

Comment 17-30: Page 17-2 of the DEIS states, “consideration could also be given to implementing shuttle bus service between the arena and other LIRR stations to intercept attendees traveling to/from eastern Long Island so they do not have to backtrack through Jamaica.” What studies were done at the locations that are considered to ensure no additional traffic impacts? Where would the shuttle buses park? What routes would these shuttle buses take? (VFP_2548)

Response 17-30: Chapter 17 of the FEIS and the draft TMP in Appendix J provide further details about the accommodations for charter and shuttle buses that would be implemented as part of the demand management strategies within the TMP, including the anticipated routes that they would take to and from the Project Sites. These buses have been accounted for in the analysis of the local street network in the FEIS. Outside of the traffic study area, shuttle bus trips would be more dispersed among different routes and are not anticipated to result in additional traffic impacts.

Comment 17-31: Are there any plans to run shuttle service from either Floral Park, Jamaica LIRR stations, Flushing, Hempstead Multi Modal Bus Terminal, Rockville Centre, Lynbrook, Queens Village, NYC Transit subway stations for service to the arena? (BPCC_132)

Response 17-31: As part of the demand management strategies in the TMP there are plans to run shuttle buses between the arena and the LIRR Rockville Centre Station and Downtown Jamaica (with connections to subway stations), and other off-site park-and-ride locations as discussed in Chapter 17 and in the draft TMP found in Appendix J. The TMP also includes plans to run shuttle buses between the arena and a station on the LIRR Main Line (e.g., New Hyde Park or Mineola) in the interim period prior to westbound service at the new LIRR Elmont Station.

Comment 17-32: Has LIRR agreed to provide a shuttle service to other stations? Who pays for the shuttle service? For how long before and after an event will the shuttle run? What is the quantitative benefit? (Curran_2564)

Response 17-32: Shuttle bus service to a select number of other LIRR stations—with the approval of the LIRR—would be provided by MTA Bus Company, MTA New York City Transit, NICE, and/or private bus operators under contract to NYAP, to be paid by NYAP. Shuttle bus service would be provided for approximately one to two hours before and after events at the arena. The shuttle bus operation would allow arena attendees to either take the LIRR to one of several LIRR stations or park-and-ride locations, and continue to the arena, rather than drive to the arena, and thus reduce
the volume of traffic and potential traffic on the local street network and the Cross Island Parkway.

Comment 17-33: What is the quantitative benefit of charter buses? Full-sized buses are not permitted on the CIP, what routes would they take? Can local roads accommodate full-sized charter buses? How will the addition of full-sized charter buses affect the levels of service (LOS) along the routes they would be required to take? Additional analysis on County and local roads needed. (Curran_2564)

Response 17-33: The benefit of using charter buses is to transport arena patrons in a fewer number of vehicles, resulting in a net reduction of vehicles on the roadway network. Charter buses would be used to transport large groups traveling from one location (e.g., school trips, company outings). The traffic analysis in Chapter 17, “Mitigation,” includes an assessment of the effects of these buses on the local street network.

Comment 17-34: The TMP identifies a monitoring plan that would be done after the project is constructed and occupied to identify potential impacts and address them. Deferring improvements until after the construction is complete is contrary to the purpose of the EIS. (Gunther_TS1_865, VFP_2547)

Response 17-34: A monitoring plan has been developed as part of the draft TMP (see Appendix J). The monitoring plan has been reviewed by NYSDOT, NYCDOT, and NCDPW. As the Proposed Project is constructed and opened, and the traffic and use of public transportation can be monitored, the effectiveness of the overall TMP and its specific components would be evaluated and can then be adjusted where and when needed. As noted in the response to Comment 17-13 above, since the publication of the DEIS the TMP has been further developed, refined, and is quantitatively evaluated in the FEIS (See Chapter 17, “Mitigation,” and Appendix J). The mitigation plan includes the development of a new, full-time Elmont Station on the LIRR Main Line, implementation of a comprehensive TMP including a set of demand management strategies aimed at reducing the volume of project-generated peak hour vehicular trips, and standard traffic engineering and operational improvements.

Comment 17-35: The mitigation has to be figured out before the project begins. Physical improvements can take years to progress through design, property acquisition, and construction, during which time the impacts go unmitigated. Physical improvements to accommodate more traffic need to take place before the arena, hotel, and retail village are allowed to operate. (Chatterton_TS2_903, EAM_2563, Fishinger_TS1_868 McEnery_2340, VFP_2547)
Response 17-35: The most impactful mitigation measure is a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties and reduce vehicular traffic demand. The LIRR has developed plans for this station. The south platform of this station would be completed in 2021 prior to opening of the arena and provide eastbound service, while the north platform and westbound service would not be operational until the completion of the East Side Access and Third Track projects (expected in 2023). Demand management strategies including shuttle bus service from other LIRR stations would be implemented during this interim period, as discussed within Chapter 17, “Mitigation.” These plans and their benefits and potential impacts are fully described in the FEIS.

Comment 17-36: The scope of work for the TMP would include Automatic Traffic Recorder (ATR) counts. Why are these not being done as part of the EIS? (VFP_2548)

Response 17-36: The ATR counts to be included as part of the TMP would help identify the demand management strategies proving to be most effective and those that are not, thus enabling continued improvement of the TMP on a regular basis and allowing it to adapt to reflect actual conditions. ATR counts were conducted as part of the EIS. As noted in Chapter 11, “Traffic counts on the local street network were conducted using a combination of Miovision turning movement and vehicle classification counts at all study area intersections and 24-hour ATR machine counts at 35 locations for a continuous nine-day period including two weekends.”

Comment 17-37: I urge ESD to work with the local municipalities to close off residential streets, such as Plainfield Avenue, to through traffic on game days and it should consider working with apps to turn off local side streets from being utilized as through routes in the surrounding residential communities. As a mitigation measure, I urge the prohibition of right turns from Plainfield Avenue onto Hempstead Turnpike prior to arena events and to prohibit left turns onto Plainfield Avenue from Hempstead Turnpike following arena events. ESD and NYAP should provide resources to local police departments to manage and direct traffic before and after arena events. (Culotta_TS4_1036, Culotta_2365, Culotta_2572)

Response 17-37: NYAP is committed to working with the local municipalities, transportation agencies, and emergency responders as part of the stakeholder group established by the TMP for the Proposed Project. One of the elements of the TMP is to partner with Waze and possibly other mobile navigation app providers to designate sensitive local residential streets such as Plainfield Avenue as “closed” and “unavailable” to traffic that might otherwise divert to it to get to the arena during pre-event and
Chapter 22: Response to Public Comments

post-event peak hours. Plainfield Avenue would not need to be physically closed, and could still be used by local residents or by those who know of its availability, but not by those who would otherwise rely on Waze for route advice. As noted by the commenter, it would be possible to take a more dramatic approach and prohibit turns to pose greater restrictions on the ability of cars to use Plainfield Avenue to get to and from the arena; those measures and/or others could also be considered for implementation by the stakeholder group if necessary.

Comment 17-38: If you eliminate left turns from the arena, this will help with the traffic flow exiting after a game. At the Coliseum they have a police officer who extends the green at the traffic light. (McArulla_TS3_965)

Response 17-38: Unlike the Nassau Coliseum, the Proposed Project would include two direct points of egress to the Cross Island Parkway (at Interchanges 26A and 26D) that would not require exiting traffic to pass through traffic signals and the local street network. The majority of traffic exiting the South and East Lots at the intersection of Hempstead Turnpike and Locustwood Boulevard/Gate 5 Road would be expected to make right turns to access the Cross Island Parkway. Traffic mitigation measures have been developed at this intersection to facilitate the flow of exiting traffic after a sold-out arena event, which would fully mitigate the significant adverse impacts identified at this location.

Comment 17-39: Please provide the details of the Event Management Plan, including assigned taxi, limo, private car services, and bus parking. (Curran_2564)

Response 17-39: The draft TMP is found in Appendix J. The Operations Plan section of the TMP includes details of the assigned parking locations for taxis, limos, private car services, and bus parking.

Comment 17-40: The DEIS on page 17-13 states “consideration could also be given to pre-selling parking permits by parking location.” Where will patrons park if they do not have a pre-paid permit? What, if any, parking sites are being considered besides the South, North, and East Lots? (VFP_2548)

Response 17-40: Chapter 11, “Transportation,” has been updated to note that during times of arena events pre-paid parking permits would be used in the South Lot and may also be used for the parking within and below the hotel’s podium. The other parking facilities, including the parking beneath the retail village and the North and East Lots would be utilized by arena patrons that do not have a pre-paid permit. Chapter 17 also discusses remote parking facilities that would be used as a park-and-ride where arena patrons would park and take a shuttle bus to the arena.
Comment 17-41: The DEIS on page 17-3 states “potential mitigation measures…could include strict enforcement of existing parking regulations by ticketing and/or towing illegally parked vehicles.” Who will be responsible for enforcing this? Who will enforce regulations within the project parking lots including the prohibition against tailgating? (VFP_2548)

Response 17-41: As noted in the response to Comment 1-88, tailgating in parking lots would be prohibited and enforced by on-site security personnel. Existing parking regulations off-site would be enforced by local police departments.

Comment 17-42: Even though the DEIS significantly understates traffic related impacts on local streets, the DEIS still fails to identify meaningful mitigation measures to address even those impacts. NV5’s assessment shows that the minimal specific mitigation measures proposed in the DEIS are inadequate.

ESD still concedes that the project will cause significant and severe traffic impacts on local road networks, which will destroy the suburban character of Floral Park and other areas. Rather than address these severe impacts, the DEIS offers no concrete mitigation measures that would actually address these already understated impacts. A project that does not properly identify and then appropriately mitigate significant and severe adverse impacts does not serve a legitimate public purpose. None of ESD’s other objectives override this concern to justify this project, because another smaller scaled project could serve all of ESD’s objectives while also minimizing impacts. (VFP_2547)

An arena plus a hotel and mega mall with no clear-cut way to alleviate the congestion on the roads leading there is not feasible. (Gorry_TS4_1010)

Response 17-42: The traffic engineering improvements identified in the DEIS were able to mitigate the significant adverse traffic impacts on the local street network with the exception of only two intersections. Between publication of the DEIS and completion of this FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties and the TMP described in the DEIS has been further developed, refined, and is quantitatively evaluated in this FEIS (see Chapter 17 and Appendix J). The TMP includes demand management strategies aimed at reducing peak hour auto trips generated by the arena and reducing unmet traffic demand along the Cross Island Parkway, the projected effects of which are detailed in Chapter 17 and Appendix J. The new LIRR Elmont Station and the demand management strategies in the TMP is a major action towards maximizing mass transit usage to the Project Sites, reducing
traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets.

Comment 17-43: I urge you to ensure the mitigation measures are feasible, workable and will address the identified and studied impact on traffic, transportation, and parking. I am not convinced that they are adequate. (Ambrosino_108, Ambrosino_2223)

Response 17-43: As part of the TMP, a monitoring plan would be implemented to measure the effectiveness of the various components of the TMP via traffic counts, travel speed data, modal split surveys, trip generation surveys, parking surveys, and other tools outlined in the TMP found in Appendix J.

Comment 17-44: The DEIS does not address mitigation for increased traffic from project, especially with regards to increased traffic on the CIP. (Coven_2232)

Response 17-44: The DEIS does address mitigation for the Proposed Project within Chapter 17, “Mitigation”. As noted in the response to Comment 17-13, between publication of the DEIS and the completion of this FEIS, the TMP described in the DEIS has been further developed, refined and quantitatively evaluated (see Chapter 17 and Appendix J). The mitigation plan includes the development of a new, full-time Elmont Station on the LIRR Main Line, implementation of a comprehensive TMP including a set of demand management strategies aimed at reducing the volume of project-generated peak hour vehicular trips. The Mitigation chapter of the FEIS provides a detailed quantitative assessment of the extent to which a specific set of traffic demand management strategies would be expected to reduce the magnitude of traffic increases on the highway network and its effect on the amount of “unserved” vehicles (unmet demand) and level of service on the Cross Island Parkway.

Comment 17-45: The traffic concerns must be addressed before ground breaking. Traffic at present during rush hour is barely tolerable, adding an additional several thousand vehicles is unthinkable. (Milazzo_2203)

Response 17-45: Groundbreaking is expected before the end of this summer, while implementation of the range of transportation mitigation measures would not be needed until well after that point, approaching completion and opening of the Proposed Project.

Comment 17-46: The draft EIS correctly concluded that traffic congestion on the Cross Island Pkwy will have a major negative impact on the surrounding communities. The draft EIS provided no reasonable, proven or realistic method to address this negative impact. (Baggott_2143)

Response 17-46: The DEIS did not conclude that traffic congestion on the Cross Island Parkway would have a “major negative impact on the surrounding
communities.” As noted in the response to Comment 17-13, an expanded mitigation plan has been detailed and comprehensively evaluated in the FEIS, which includes the development of a new, full-time Elmont Station on the LIRR Main Line, implementation of a comprehensive TMP including a set of demand management strategies aimed at reducing the volume of project-generated peak hour vehicular trips, and standard traffic engineering and operational improvements, which would substantially reduce the impacts that would otherwise be created.

Comment 17-47: Proactive efforts to mitigate traffic related impacts for local residents and commuters are essential. The implementation of a full-time train station with a park-and-ride option would provide the proper relief to the inevitable influx of traffic already overloaded Cross Island Parkway. (Vallone_2261)

Response 17-47: The FEIS presents a significant new mitigation measure—the LIRR has developed plans for the creation of a new full-time Elmont Station on its Main Line that would serve arena patrons using the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches, and thus provide direct service to Nassau and Suffolk Counties, in addition to running trains to the Belmont Park Station on the spur. Also, a draft copy of the TMP—which contains proactive measures designed to maximize mass transit usage to the Project Sites, reducing traffic on the Cross Island Parkway and thus minimizing the potential for traffic diversions onto local streets—is available in Appendix J of this FEIS. The draft TMP has been shared with, and reviewed by, NYSDOT, NYCDOT, and NCDPW.

Comment 17-48: The DEIS acknowledges that the existing traffic traversing Floral Park is unsustainable (page 11-21), however, it concludes that after construction of the project, that the addition of traffic signals, lane striping, and turning & parking restrictions along Plainfield Avenue & Jericho Turnpike are all that’s needed to resolve this. This is despite that there will be additional traffic volume. (Gunther_2344)

Response 17-48: The DEIS does not acknowledge that “the existing traffic traversing Floral Park is unsustainable.” It does conclude that signal timing modifications would mitigate projected significant adverse traffic impacts at the intersections of Plainfield Avenue with Jericho Turnpike and Tulip Avenue.

Comment 17-49: The traffic analysis is so deficient the City of New York has resorted to undertake its own assessment of the project’s traffic impacts in Queens. By letter dated December 17, 2018, New York City Comptroller Scott Stringer and Council Member Barry Grodenchik requested NYCDOT
undertake a study on the impacts of potential project-related traffic increases on nearby neighborhoods. The letter states: “The interplay between the [Belmont] redevelopment plan and the existing [NYRA] facility will undoubtedly affect not only the Nassau County region, but Queens communities as well. ... Not only are [the] six intersections [in Queens studied in the DEIS] insufficient to gauge the impact of this project on Queens neighborhoods, they are also largely under the jurisdiction of DOT, not the State.” By letter dated January 17, 2019, the City’s DOT agreed to undertake the requested analysis. In response, Councilmember Grodenchik stated: “Anything that can be done to mitigate the impacts of traffic on the communities of Eastern Queens will help preserve quality of life for local residents.”

Another agency’s jurisdictional authority over particular intersections does not excuse ESD’s failure to conduct an adequate study or identify appropriate mitigation. The City of New York has the resources to conduct its own assessment to protect its residents’ interests. Floral Park and other small communities in Nassau County do not. (VFP_2547)

Response 17-49: ESD has met with representatives of NYCDOT several times during NYCDOT’s review of the DEIS and ESD’s preparation of the FEIS and supporting materials for both the DEIS and FEIS, and all of NYCDOT’s questions have been resolved. Please see the correspondence from NYCDOT in Appendix M.

Comment 17-50: There’s a need for infrastructure improvements, signal timing is not going to address the amount of traffic that would be generated. We need real concrete changes to be made to allow the traffic flow to be done properly to make this all work. More substantial infrastructure is required to provide adequate traffic mitigation. (Ra_TS4_969, Ra_2571)

Signal timing is not going to work. (Weiner_SSAS_2097)

Response 17-50: The EIS does not rely on signal timing alone to mitigate significant adverse traffic impacts. LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties. This is a major infrastructure improvement that is expected to substantially decrease vehicular traffic to the Project Sites.

Comment 17-51: Any final project must include a long overdue, significant expansion of the CIP to proactively deal with increased traffic. The DEIS assumes the majority of traffic will use the CIP, but 67 percent of the project's traffic can't be handled by that road and no improvements have been offered. No highway improvements are proposed to address 90 percent of site traffic projected in the EIS to use the CIP. There’s a need for infrastructure
improvements to deal with the traffic problem. (Fishinger_TS1_868, Lasher_082, Mesnick_2237)

It is critical that the analysis be revised in the DEIS to clearly set forth a detailed plan for improvements to State, County and local roads necessary to accommodate a project of this scope and scale. (Curran_2564)

Suggest building an extra lane on the CIP between Belmont and the Southern State Parkway in both directions, as there appears to be space for that in between those locations. If the CIP can be widened, I see that as a possible solution to the vehicle backup upon entering the arena parking lots. Please do not shortchange this very important analysis of access and exit pathways. The only roadway improvement to be made is on Hempstead Turnpike at Locustwood Drive/Gate 5 Road. Why are there none on the CIP? Did they study that no other intersections or roads need improvements? (Alexander_TS1_887, Bayat_2105, Comrie_104, Comrie_134, Comrie_TS4_968, EAM_2563, Fishinger_TS1_868, Gunther_TS1_865, Hellenbrecht_BCCA_052, Juliano_TS2_915, Lasher_082, Mesnick_2237, Tommy_040, VFP_2548, VLI_2125, Weissman_TS2_922)

Response 17-51: Widening of the Cross Island Parkway is neither practical nor reasonably feasible. Since it is not possible to add highway capacity, the focus of the mitigation plan has been on the reduction of vehicular demand on the Cross Island Parkway during peak project-generated traffic periods via a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur and a comprehensive TMP. This TMP is detailed and evaluated in Chapter 17, “Mitigation,” and includes a comprehensive set of demand management strategies as well as conventional traffic engineering improvements including but not limited to those at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road.

Comment 17-52: The DEIS on page 17-2 states that widening of the CIP is neither practical nor reasonably feasible, and has been precluded as an option. The Village's traffic consultant, NV5, stated that, according to AASHTO, the northbound entrance to the CIP would require a minimum of 720 feet of acceleration lane for cars turning onto the entrance ramp from the North Lot. The existing acceleration lane is 500 feet long. The southbound ramp is 300 feet long. As both these entrances to the CIP are significantly shorter than the proper distance: what construction efforts will be required to extend these ramps? If the ramps are not extended, significant backups will occur in cars exiting the North Lot. What studies have been done on the impacts of noise, air, light pollution, etc. with cars not able
to exit in a reasonable time? If the ramps are not extended and a lane in each direction is closed to allow cars to enter, what impact studies on CIP traffic were done? (VFP_2548)

Response 17-52: The Cross Island Parkway interchange at Exit 26D has constraints such as the presence of existing bridges and extending the length of the entrance ramps is neither practical nor reasonably feasible. The segment of the Cross Island Parkway adjacent to the Project Sites was assessed using a VISSIM micro-simulation model to replicate the influence that entrance and exit ramps serving the Proposed Project have on the parkway. The results of these analyses, which are described in Chapter 11, “Transportation,” of the DEIS showed that there would be queueing on the northbound on-ramp during the Saturday Midday and Saturday night peak hours when there are departures of arena patrons for a sold-out Disney on Ice show and a sold-out hockey game, respectively, but there would be no queuing on the southbound on-ramp.

The mitigation strategies evaluated in the FEIS eliminated the backup on the northbound on-ramp during the Saturday night peak hour. However, the analysis of departures from a Disney on Ice Show during the Saturday Midday peak hour did not include demand management strategies for arena patrons such as the shuttle bus service to/from the LIRR's Rockville Centre Station, the Downtown Jamaica area, and park-and-ride facilities, which would reduce the queuing of vehicles exiting the North Lot. Other potential strategies to facilitate the flow of traffic merging onto the Cross Island Parkway after arena events are discussed in the Operations Plan of the draft TMP, which is included in Appendix J.

Comment 17-53: Increased truck and bus traffic for the project are not allowed on the CIP and the TMP does not account for this. These vehicles would travel on local roads adding to congestion. (Comrie_TS4_968, Pombonyo_TS1_862)

Response 17-53: The traffic analysis took into account that Project-generated truck and bus traffic are not allowed to use the Cross Island Parkway, and those trips were routed to the Project Sites by alternative north-south arterials leading to Hempstead Turnpike/Avenue. Their effect on traffic flow are fully accounted for in the intersection level of service analyses. Chapter 17, “Mitigation” also accounts for the shuttle and charter buses that would be implemented as part of the demand management strategies in the TMP.

Comment 17-54: The TMP takes a wait and see approach regarding off-site parking on local streets. Nassau County finds this approach to be risky and strongly recommends the TMP take a proactive approach to address the potential for parking on local streets and associated impacts. (Ambrosino_108, Ambrosino_2223, Curran_2564)
Response 17-54: A proactive approach is being taken to address the potential for off-site parking on local streets which is detailed in Chapter 17, “Mitigation,” of the FEIS. Between publication of the DEIS and the completion of this FEIS, the TMP described in the DEIS has been further developed, refined and quantitatively evaluated (see Chapter 17, “Mitigation,” and Appendix J).

The Town of Hempstead has been included as a stakeholder in the TMP, and NYAP would coordinate with the Town of Hempstead to modify the existing Elmont Special Parking District located on the south side of Hempstead Turnpike between Wellington Road and Fieldmere Street to limit on-street parking during times of arena events to residents with a permit. The Mayfair Avenue Gate near the North Lot would be closed to pedestrians to prevent arena patrons from parking in the West End of Floral Park and catching a shuttle bus to the arena. Additionally, LIRR tickets would be required to gain pedestrian access from the new LIRR Elmont Station to the North Lot. The TMP would include a monitoring plan to review the extent of utilization of on-site parking and the potential for off-site parking on local streets.

Comment 17-55: This is an opportunity for DOT to consider innovative parking mitigation. DOT representatives have previously stated that neighborhoods adjoining and surrounding stadiums are well suited for a Residential Parking Permit program, whereby curbside parking is restricted to local residents during appointed hours of the day. This system has been considered by the DOT at both Yankee Stadium and the Barclays Center and should be examined in the context of the Belmont Park Redevelopment Project. (Stringer_144)

Response 17-55: Comment noted.

Comment 17-56: Suggest parking permit signs on game days and weekends on the Queens Village side of the development. Restricted parking is not enforced. It is supposed to be permit parking. Permit parking should be enforced.

During the annual Belmont Stakes, it is difficult to find parking in one's own neighborhood. New York Arena Partners will have to coordinate with local municipalities to ensure residents are able to park within the vicinity of their home without competing with fans and shoppers.

We can’t have visitors occupying our street parking. Regulations need to be changed to “Permit Parking Only At All Times.” (Culotta_2365, Dasrath_MTA_2196, Gullo_TS3_939, Labissiere_TS4_1006, Solages_2402)

Response 17-56: The EIS points out that there is a potential that arena patrons may attempt to park for free on-street in the surrounding neighborhoods to avoid
paying for parking, and the Mayfair Avenue Gate (Gate 9) would be enhanced or staffed with a security guard to close the pedestrian entrance during arena events to prevent arena patrons from parking in the West End of Floral Park and walking in to the North Lot to catch a shuttle bus to the arena. Additionally, LIRR tickets would be required to be presented for pedestrian access from the LIRR Elmont Station to the North Lot to prevent arena patrons from parking in Bellerose Terrace and catching a shuttle bus to the arena. As part of the TMP (Appendix J), a monitoring plan would be included that would include observations of the use of on-street parking spaces in the surrounding residential neighborhoods during different types of events and on non-event days. Should parking in other residential neighborhoods occur, potential mitigation measures that could be implemented to address this issue are discussed in Chapter 17, “Mitigation.”

Comment 17-57: City Comptroller Scott Stringer and I issued a joint letter asking the New York City Department of Transportation to review traffic patterns during peak trip periods as well as the local share between mass transit and vehicle usage and to propose solutions to mitigate the anticipated increase in congestion. (Grodenchik_TS4_971)

Response 17-57: Comment noted.

Comment 17-58: The mitigation measures for transportation do not address emergency vehicle response time. (Pombonyo_TS1_862)

Response 17-58: Please see the response to Comments 3-15 and 11-237.

Comment 17-59: There are no detailed plans for expanded bus and taxi services. (PCA_020, TMCA_024)

Response 17-59: Since the publication of the DEIS, the TMP has been further developed, refined, and quantitatively evaluated (see Chapter 17 and Appendix J in this FEIS). The management strategies articulated in the TMP include charter bus, off-site park-and-ride with shuttle bus connections to the arena from multiple locations, carpooling and ride hailing services, and increased local bus service. The primary goal of Project mitigation for traffic is to offer greater mass transit options as a means of reducing traffic on the Cross Island Parkway, and thus minimize the potential for traffic diversions onto local streets.

Comment 17-60: Any final project must include a full-service Long Island Rail Road station with east and west access to mitigate the project-generated traffic impacts.

Nassau County strongly encourages the project sponsor to continue discussions with the MTA-LIRR regarding convenient and reliable
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

commuter railroad service to the Belmont Property. The transit connection is critical to addressing and mitigating significant impacts to State, County and local roadways within the communities of Bellerose, Elmont, Floral Park, and New Hyde Park in Nassau County. (Curran_2564, Form Letter 6, Gayron_FL6_110)

Response 17-60: As described in detail in the FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties. As evaluated in detail in Chapter 17, “Mitigation,” this would result in many new LIRR trips and the reduction of auto trips during both the pre-event arrival and post-event departure peak periods and help mitigate traffic impacts on the roadway network.

Comment 17-61: Page 17-1 of the DEIS states “the TMP would include a combination of transportation demand management measures (e.g., carpooling and incentives to use transit).” How is this possible if there will only be 2 trains inbound and 2 outbound?

This project was previously marketed as dependent on reliable and robust LIRR access to mitigate transportation concerns, the DEIS appears to have given up on that notion and anticipates extremely limited transit serving the site. (Baggott_2331, VFP_2548)

Response 17-61: The DEIS assumed that LIRR service would only be available via the Belmont Park spur line. However, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via stations along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches) and more frequent service to and from points west, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. The new Elmont Station would be located adjacent to the North Lot and would provide significant service in addition to the service provided to the Belmont Park spur station.

Comment 17-62: The TMP offers little help with the significant impacts on local streets, highway network, bus service, and parking. Nothing short of major highway improvements on the CIP and a fully functional LIRR station would mitigate traffic generated by the project. There may not be sufficient ROW on the CIP and MTA only committed to limited LIRR service around major arena events. (Hellenbrecht_BCCA_052)

Response 17-62: The TMP, as documented in Chapter 17, “Mitigation”, offers a substantial reduction in volumes in traffic on the Cross Island Parkway during pregame arrival peak hours and postgame departure peak hours; major
highway capacity improvements are neither practical nor reasonably feasible. Also, as documented in the Mitigation chapter of the FEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties (via stations along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches). This would be a very attractive mode for Long Islanders going to arena events, as has been evaluated in detail in the FEIS.

Comment 17-63:

The DEIS on Page 11-84 states: “Bus operators normally adjust their service based on ridership and market demand, and it is anticipated that such increases in service would be coordinated with NYAP as part of the transportation management plan for the arena.” There is no confirmation given that the two bus agencies (NICE & MTA) are even willing to consider the addition of trains and/or bus routes to the existing schedules. The DEIS states that existing mass transit facilities will be adversely affected if additional trains or buses are not added. If NICE bus service is increased due to the project, who will pay for it? (EAM_2563, VFP_2548)

Currently during the cold weather months, the N6 bus that runs east/west along Hempstead Turnpike frequently refuses to pick up passengers because their buses are full to capacity. Nassau NICE Bus frequently removes bus lines because they can't afford the bus lines already running. There are no resources for additional bus systems. (Alexander_TS1_887, Milazzo_2203)

It is expected that the Proposed Project will generate additional demand for NICE bus service. Currently, the N6 route is at or above capacity during peak travel times. Many passengers are “passed up” by full vehicles unable to board additional passengers. Additional service, equipment, and infrastructure will be needed to support the new demand coming from the project site. As a result, NICE Bus anticipates the following needs: 1) eight additional 40-foot CNG buses will be needed to accommodate the additional services; 2) funding and operating costs—a first-round, low estimate for the operating costs of running additional service is $225,000 a year; and 3) transit amenities—the current plan shows various spots for car-share pick up/drop off zones but does not include added amenities for buses. A plan should include cut-outs (150’x12’) with well-lit, fully accessible bus shelters including digital bus arrival signs, within close proximity to the venue. (Curran_2564)

Response 17-63:

The EIS analysis of bus service to the Project Sites and indicated that it is likely that the Proposed Project would result in a significant adverse impact to bus routes during time periods before and after sold-out arena events; it is anticipated that any need for an increase in service would be
coordinated with NYAP as part of the TMP. While additional bus service may be needed on public bus routes, it is likely this would occur during off-peak periods when additional buses already part of the NICE bus or MTA bus fleet would be available. Additionally, as of June 23, 2019, NICE has committed to adding more buses and an expanded schedule to it “Flexi” route serving Elmont and Valley Stream.

ESD and NYAP have met with NICE Bus and have been coordinating a plan to meet their needs. The Applicant is responsible for providing bus pull-outs on both sides of Hempstead Turnpike adjacent to the Sites to alleviate congestion in travel lanes when buses stop to drop-off and pick-up passengers and to provide bus stops in closer proximity to the project components and the Belmont Park Racetrack for employees and visitors that would use the N1, N6, and N6X bus routes. These pull-outs would include amenities such as a shelters and electronic schedule information. There is no requirement for the Applicant to fund the purchase of additional buses for NICE.

As described in the response to Comment 11-121, since the publication of the DEIS, the LIRR has developed plans for a new, full-time Elmont Station on the Main Line that would directly serve arena patrons from Nassau and Suffolk Counties and more frequent service to and from points west, which would become a major addition to the public transportation services, along with the existing Belmont Park Station on the spur. This and the demand management strategies in the TMP, which include shuttle bus service to/from the LIRR’s Rockville Centre Station, the Downtown Jamaica area, and park-and-ride facilities, would provide additional significant alternatives to accessing the Project Sites.

Comment 17-64: The DEIS on page 17-2 states, “Implementation of the recommended traffic engineering improvements is subject to review and approval by NYSDOT, Nassau County Dept. of Public Works, or NYCDOT depending on the location of the intersection. If any of these measures are deemed infeasible and no alternative mitigation measure can be identified then the identified significant adverse traffic impacts at such a location would be unmitigated.” How can the project go forward if these public agencies solutions are deemed infeasible? (VFP_2548)

Response 17-64: The traffic engineering improvements recommended in the FEIS have been accepted by NYSDOT, NYCDOT, and/or NCDPW for intersections within their respective jurisdictions. In addition, a number of the TMP strategies do not fall under the jurisdiction of any agency for approval.

Comment 17-65: The Applicant should work with the community to ensure appropriate traffic flow to minimize disruptions for the area. Does the community have a say in how the TMP works? (Gunther_TS1_865, Schmidt_2278)
Chapter 22: Response to Public Comments

Response 17-65: The TMP would be reviewed and refined on a regular basis at meetings with stakeholders such as transportation agencies, police departments, and local municipalities.

Comment 17-66: Please don’t put a red light on every corner like Queens did. (Amato_2362)

Response 17-66: Only one new traffic signal has been proposed as a mitigation measure. This would be located at the intersection of Hempstead Avenue and the Cross Island Parkway northbound off-ramp.

Comment 17-67: What are the details of modifying the signals at the intersections of Plainfield Avenue at Tulip Avenue as well as Jericho Turnpike at Plainfield Avenue/Emerson Avenue? (Curran_2564, VFP_2548)

Response 17-67: The proposed signal timing modifications are provided in the mitigated LOS tables in Appendix F of the EIS.

Comment 17-68: No signal warrant analysis was conducted for the recommended signal at Hempstead Turnpike at the Cross Island Parkway southbound off-ramp. A signal warrant analysis is normally completed following the Manual on Uniform Traffic Control Devices (MUTCD) guidelines. (EAM_2563, Schneider_TS1_849)

Response 17-68: A traffic signal was not proposed at the intersection of Hempstead Avenue and the Cross Island Parkway southbound off-ramp. The traffic signal was proposed at the intersection of Hempstead Avenue and the Cross Island Parkway northbound off-ramp.

As discussed in the EIS, a warrant analysis was performed at this location and has been found to conditionally satisfy the MUTCD peak hour warrant (Warrant 3) for a traffic signal based on existing and projected traffic volumes. The signal warrant analysis has been provided to NYCDOT, which is the agency responsible for implementation of the proposed signal.

Comment 17-69: Mitigation is unrealistic, especially at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5, relying on traffic cones being laid out in different configurations on the same day by security staff. Mitigation is misrepresented in the write-up as if there will be widening/new lanes, when in fact there would be one less eastbound through lane as laid out in the diagram in the appendix. (EAM_2563)

Response 17-69: The use of traffic cones to temporarily change lane configurations is no different than what is done at other sports venues across the United States when there are large volumes of vehicles traveling in one direction prior to or after an event. The traffic improvement measures proposed this
intersection have been updated in Chapter 11, “Transportation,” and Appendix F to reflect comments received by NYSDOT and NICE and reflect three eastbound through lanes at the intersection, the same number of through lanes that are provided in existing conditions.

Comment 17-70: The following proposed mitigation actions would affect or occur near a NYCDOT bridge structure: installation of a curb extension on Hempstead Avenue west of the southbound CIP off-ramp; installation of a new traffic signal on Hempstead Avenue at the northbound CIP off-ramp; and widening of the northbound CIP off-ramp at Hempstead Avenue from one 16 foot lane to two 11 foot lanes. NYCDOT Bridges should be engaged during the design and installation of these elements particularly with respect to northbound off-ramp widening and any potential impacts to the grading, geometry, etc. of the service lane/northbound on-ramp, in addition to Geometric Design, Signals, etc. (NYCDOT_2562)

Response 17-70: The Applicant would consult with NYCDOT Bridges during the design and installation of these elements.

Comment 17-71: The proposed signal timing modifications to the cycle length at the intersection of Hempstead Avenue and 225th Street are not feasible. This change will disrupt signal coordination along Hempstead Avenue. (NYCDOT_2562)

Response 17-71: The proposed mitigation measures in the FEIS have been updated and no longer include changes to the signal cycle length.

Comment 17-72: Please provide the developer’s commitment letter for the proposed traffic signal at the intersection of Hempstead Avenue and the Cross Island Parkway northbound off-ramp. (NYCDOT_2562)

Response 17-72: The requested letter has been provided to NYCDOT.

Comment 17-73: Who will pay for the proposed mitigation measures, including TEAs? (NYCDOT_2562)

Response 17-73: The proposed mitigation measures, including TEAs, would be paid for by the Applicant.

Comment 17-74: The drawings provided for the proposed mitigation at the intersection of Hempstead Avenue and the Cross Island Parkway southbound off-ramp do not show how the curb modification will align with the sidewalk east of the off ramp. Please show this alignment and how pedestrians will cross with the proposed modification.
Please contact the MTA/NYCT regarding the proposed curb extension and bus lay-by lane on the south side of Hempstead Avenue to ensure the proposed configuration will not impact their operations.

In addition, the Mitigation chapter states a TEA would be used to temporarily provide a free-flowing northbound right turn for vehicles on the off-ramp, with the TEA stopping traffic in instances when pedestrians would use the south crosswalk. How often would TEAs need to stop traffic during the peak hours? (NYCDOT_2562)

Response 17-74: The drawings of the proposed mitigation measures in Appendix F of the FEIS have been updated to show the crosswalk and pedestrian ramps.

The transit agencies that use the bus stop on the south side of Hempstead Avenue—MTA Bus Company, MTA New York City Transit, and NICE—have been consulted regarding the proposed improvements.

Based on existing pedestrian volumes, it was assumed that a TEA would need to stop traffic up to 20 times during the weekday PM peak hour and up to 10 times during the Saturday PM peak hour. As described in the EIS, an additional TEA could be deployed at this location when necessary during event ingress periods to monitor queue lengths on the off-ramp and prevent queues from spilling back onto the Cross Island Parkway mainline.

Comment 17-75: The Cross Island northbound off-ramp at Hempstead Avenue is proposed to be widened from one 16-foot right turn lane to two 11-foot right turn lanes. Please contact DPR regarding the proposal. In addition, please provide turning radii for two simultaneous right turns. (NYCDOT_2562)

Response 17-75: DPR has been included in the FEIS as an involved/interested agency and would be contacted once plans for this widening are further advanced. The requested drawing has been provided to NYCDOT.

Comment 17-76: Please obtain NYPD’s written commitment that TEAs will be provided at the locations identified in the mitigation chapter. TEAs would need to be provided for any event at the arena for minimally the first year until the monitoring plan can determine at which attendance level impacts us would occur that TEAs are needed. (NYCDOT_2562)

Response 17-76: The Applicant would be responsible for the funding of TEAs, similar to what occurs at Citi Field. This would be done at project implementation.

Comment 17-77: Please include the monitoring of non-event days in the monitoring program. The proposed project also involves a retail development that will generate a significant amount of traffic. The proposed monitoring plan should also include trip generation, origin/destination and mode choice survey to determine whether the trip generation is accurate, as well
as non-event days. Also should survey to determine the internal capture trips and pass by trips. Please submit a scope of work for any monitoring to be performed prior to any data collection for NYCDOT review and approval. Please indicate which entity will be responsible for the monitoring plan. (NYCDOT_2562)

Response 17-77: The requested items for the monitoring plan have been incorporated into the draft of the TMP (Appendix J), which has been provided to NYCDOT for its review and comment. NYCDOT would be included as a stakeholder as part of the TMP. The monitoring plan would be paid for by the Applicant.

Comment 17-78: According to the project description, there will be 44 to 60 New York Islanders home games, and NYAP envisions approximately 145 non-NHL arena event days annually, including: approximately 50 marquee concert/entertainment event days that would fully utilize the arena’s space (approximately 19,000 seats); approximately 65 large to medium event days (utilizing between 6,000 and 11,500 seats). What mitigation measures are needed when there are large to medium events? What mitigation is needed when there is no arena event? Arena events were analyzed as a worst case scenario, but will TEAs be deployed during times of no events, or even large/medium events? At our last meeting, ESD mentioned using the No-Arena Alternative analyses to determine mitigation measures for times with no arena events, however the mitigation measures are not identified in Appendix F of the DEIS. (NYCDOT_2562)

Response 17-78: The EIS analyzed representative worst-case conditions for arena events and identified mitigation measures to the maximum extent feasible. As described in the EIS, the objective of the TMP is to identify a suite of various mitigation measures that would be implemented for different types of scenarios for event days and days with no events. Following commencement of operations, some of the mitigation measures may not be needed for scenarios that generate fewer auto trips, after confirmed by the monitoring plan. The FEIS provides an updated discussion of the type of mitigation measures that would be needed during the weekday 5:15 PM to 6:15 PM peak hour in the No Arena Alternative, which would be implemented on non-arena event days in the event the Project is approved with the arena component.

Comment 17-79: Regarding the intersection of Hempstead Avenue and the Cross Island Parkway Northbound off-ramp, why did the LOS consider Right Turns On Red will be permitted for the southbound approach during the Mitigation analysis? This intersection is located within NYC. Also please explain why during the Saturday PM peak hour the mitigation summary...
still shows an impact on the southbound right turn and was not identified in the summary. (NYCDOT_2562)

**Response 17-79:** The analysis of the intersection of Hempstead Avenue and the Cross Island Parkway Northbound Off-Ramp, which is proposed to be signalized as a traffic mitigation measure, has been updated to prohibit right turns on red.

The DEIS mitigation summary showed an impact on the northbound right turn at the intersection of the southbound Cross Island Parkway Southbound Off-Ramp. The proposed mitigation measure for this intersection has been updated in the FEIS and the impact has been fully mitigated.

**Comment 17-80:** At the intersection of Hempstead Avenue and the Cross Island Parkway Southbound off-ramp, during the PM peak hour the analyses reflects an actuated coordinated signal with 185 second cycle length. This intersection is not signalized. Please provide the rationale for the analysis. (NYCDOT_2562)

**Response 17-80:** The proposed mitigation measure at this intersection is to provide a TEA to provide a free-flowing northbound right-turn during the ingress period for an arena event and temporarily stop traffic in instances when pedestrians would use the south crosswalk. This condition was analyzed in Synchro as an actuated traffic signal.

**Comment 17-81:** The fact that traffic density hasn't been addressed will impact mall success. (Palamar_2240)

**Response 17-81:** The EIS includes detailed analyses of traffic density, speeds, and levels of service; see Chapter 11, “Transportation,” and Chapter 17, “Mitigation.” In particular, the Mitigation chapter of the FEIS presents a comprehensive analysis of the local street network and the highway network and identifies where significant impacts can or cannot be fully mitigated during five analysis periods, four of which include arrivals or departures of arena patrons associated with a sold-out hockey game (18,000 attendees) or a sold-out Disney on Ice show (11,500 attendees) with the proposed mitigation measures. The estimated effects of proposed mitigation measures are summarized in response to Comment 17-15.

It is in the Applicant’s best interest to create an enjoyable experience for patrons, including the travel experience to/from a destination. NYAP would continue to work with stakeholders to refine the TMP and to monitor conditions post-opening.
CONSTRUCTION – GENERAL

Comment 17-82: ESD doesn't identify who would be responsible for overseeing construction including implementation of mitigation. Urges ESD to assemble a community task force to coordinate with the developers, provide periodic oversight, and ensure that the project is implemented according to the EIS and ROD. (Culotta_2365)

Response 17-82: ESD would ensure that all mitigation commitments are met, including those agreed upon for the duration of construction. ESD would also assemble a stakeholder group that would include representatives of transportation agencies, emergency responders, local municipalities, and NYAP, that would be responsible for reviewing the findings of the monitoring plan component of the TMP for its effectiveness in reducing traffic demand and making appropriate adjustments where and when needed. These prohibitions would be memorialized as part of the MEC.

CONSTRUCTION NOISE

Comment 17-83: Page 17-4 mentions construction noise impacts to the Belmont Park Dormitories. What measurements were used to determine that the nearby residences and schools would not be similarly negatively impacted? (VFP_2548)

Response 17-83: As detailed Chapter 15, “Construction,” construction of the Proposed Project would result in elevated noise levels at nearby receptors, and noise due to construction would at times be noticeable and potentially intrusive. However, during even the worst-case construction activity, these noise levels would be considered acceptable for sensitive uses (in accordance with NYSDEC criteria) at most nearby receptors, including residences adjacent to the North and East Lots. At the Floral Park Bellerose School’s athletic field north of the North Lot, while construction noise may be readily noticeable and intrusive at times, the duration of construction would be limited, and the use of this open space is primarily for active recreation (e.g., sports, physical education, recess), which is less sensitive to noise than a purely passive open space would be. Consequently, construction of the Proposed Project would not result in any significant adverse noise impacts at this receptor. At residential locations immediately adjacent to Site B, worst-case construction noise levels were predicted to experience noise level increases greater than 10 dBA, which exceeds the acceptable criteria for residential uses provided by NYSDEC. As a result of the construction noise levels that would occur at these receptors over an extended duration, residences along Huntley Road, both sides of Wellington Road between Hempstead Turnpike and 109th Avenue, and the west side of Wellington Road between 109th Avenue and Hathaway Avenue would have the potential to experience
significant adverse construction noise impacts for approximately 20 months during Proposed Project construction. The Applicant and construction team would coordinate with the horse training operators to adjust construction means, methods, and scheduling whenever possible to reduce the potential for adverse noise impacts. See response to Comment 17-84 for mitigation.

With respect to construction noise impacts to the Belmont Park dormitories, due to refinements in the Proposed Project’s construction activities, the construction noise analysis has been updated in the FEIS (see Chapter 15). While construction noise may be readily noticeable at times, due to the limited duration of worst-case construction noise levels which exceed the acceptable criteria for residential uses, construction of the Proposed Project would not rise to the level of a significant noise impact at any Belmont Park dormitories.

**Comment 17-84:**
ESD should offer sound attenuating windows and air conditioning units to residents and schools within the surrounding area who will experience noise impacts resulting from activities on the project site. (Culotta_2572)

**Response 17-84:**
Consistent with SEQRA requirements, measures have been imposed to mitigate identified significant adverse environmental impacts. The mitigation described by the commenter is being made available in all areas where significant adverse construction noise impacts have been identified, and would be included in the MEC. Specifically, as described in Chapter 15, “Construction,” construction of the Proposed Project would have the potential to result in significant adverse construction noise impacts at residential locations immediately adjacent to Site B. As detailed in Chapter 17, “Mitigation,” for residences that do not have insulated glass windows, the Applicant would offer to provide and install laminated glass storm windows or replacement insulated glass windows for each window that faces the construction noise source. For residences that do not have alternate means of ventilation (i.e., air conditioning), the Applicant would offer to provide and install one through-window air conditioning unit for each room that has a window that faces the construction noise source to allow for the maintenance of a closed-window condition. A survey and in-field verification would be undertaken to confirm which residences would be eligible for this mitigation. With the provision of such measures, the façades of these buildings would be expected to provide approximately 25 dBA window/wall attenuation. Therefore, interior noise levels would be reduced to less than the 45 dBA threshold recommended for residential use during worst case construction activity. Consequently, construction noise impacts at these receptors would be fully mitigated.
Comment 17-85: ESD states it will provide sound attenuating windows and air conditioning units to dormitories on the Belmont Park project site to help mitigate noise impacts. ESD should offer the same to residents and schools in the surrounding area who will experience noise impacts from activities on the project site. (Culotta_2365)

Response 17-85: The EIS analysis in Chapter 15, “Construction,” did not find the potential for significant adverse construction noise impacts to schools. The construction analysis disclosed significant adverse construction noise impacts to some residents and mitigation for those impacts would be provided as described in Chapter 17, “Mitigation.” Additionally, there would be no significant adverse noise impacts from Proposed Project operations.

OTHER

Comment 17-86: We must be guaranteed a 500 ft buffer of natural vegetation and mature dense trees, along with a 10 ft tall berm wall along the entire border of the West end of Floral Park. Starting at Plainfield Ave all the way to the Floral Park Bellerose School with no gaps. This must be guaranteed in writing. (VFP_2548)

What is the proposed height, material, and color of the fencing between the north lot and residences? Will it be adequate to eliminate the light pollution? It has been requested that a buffer be placed between all residences and schools bordering Belmont Park from Plainview Ave to the FPBS - why has this not been incorporated? (Alfonsi_2367, VFP_2548)

DEIS states a proposed vegetated buffer along the northern boundary of the North lot. Why would this same buffer not be provided to the residents bordering the North lot? Would this efficiently block light pollution and other disturbances? (VFP_2548)

Response 17-86: The EIS analyses did not identify the potential for significant adverse environmental impacts warranting the suggested buffer. NYAP has committed to providing a hedgerow (at least 8 feet in height) with dense evergreen vegetation along a new replacement fence (between 8 and 12 feet in height) with privacy screening. This would be provided along the northeastern boundary of the North Lot to shield the Floral Park-Bellerose School recreation space from parking activities in the North Lot. Additional fencing with privacy screening would be provided by NYAP along Belmont Park Road from approximately Crocus Avenue to Mayfair Avenue to shield the adjacent Floral Park neighborhood from parking activities in the North Lot.
Chapter 22: Response to Public Comments

Comment 17-87: Will trees be planted on interior & perimeter of East Lot to mitigate heat, light, & noise pollution? (Flood_2394)

Response 17-87: The EIS does not identify potential significant adverse impacts with respect to heat, light, and noise from the East Lot requiring the suggested measures. Specific to lighting, parking field illumination would be controlled by time clock and daylight sensors to operate from dusk to dawn. A lighting control system would provide the ability to lower light levels after events on site to limit unwanted lighting late at night, but still provide sufficient safety and security lighting. No trees would be removed from the East Lot, and there are no current plans for additional trees to be planted within the East Lot.

In addition, as detailed in Chapter 17, “Mitigation,” the Proposed Project does not anticipate frequent utilization of the East Lot for patron parking.

Comment 17-88: If an indoor lot is used a natural buffer must be incorporated into the planning. (Tweedy_TS4_1039)

Response 17-88: As detailed in EIS Chapter 1, “Project Description,” there would be at a minimum a 50-foot natural buffer separating the partially-below grade parking on Site B from nearest residences. Please also see the response to Comment 1-69.

UNAVOIDABLE ADVERSE IMPACTS

Comment 18-1: In Chapter 18, “Unavoidable Adverse Impacts,” Section B Local Street Network and Highway Network, our concern about impacts on the CIP and lack of analysis on local streets in Queens. (Block_CHCA_106, Block_CHCA_133, Block_TS4_972)

Response 18-1: Please see the responses to Comments 11-48 and 11-55 in the “Transportation” section, above. With respect to measures to reduce incremental traffic, please see the responses to comments in the “Mitigation” section.

Comment 18-2: The description of the unavoidable adverse impacts is grossly understated and the benefits compared with the adverse impacts are grossly overstated. (Bambrick_TS1_875)

Response 18-2: Comment noted.

CUMULATIVE IMPACTS

Comment 21-1: The Cumulative Impacts analysis (Chapter 21) of the DEIS indicates that specific impacts from NYRA’s planned renovations were “taken into account” in the various other sections of the DEIS. The individual
sections of the DEIS, though, do not include an analysis of the potential impacts from NYRA’s renovations, and largely gloss over or discount these impacts altogether. NYRA’s planned renovations are far from speculative, having been laid out in detail by NYRA’s CEO and having been granted approval by the State to access bond funding. What is speculative, however, is the DEIS’ contention that that night racing would not take place on the same night as a hockey game due to NYAP and NYRA having “agreed to coordinate” those activities. As far as Floral Park is aware, no formal agreements between NYAP and NYRA have been provided that would prohibit night racing and hockey games, or any other large arena events, from taking place on the same night. (VFP_2547)

Response 21-1: The EIS has considered the potential impacts should the work on the NYRA proposed improvements overlap with the construction of the Proposed Project. For example, the EIS studied reasonable worst-case conditions for future activity at Belmont Park by the 2021 analysis year, conservatively accounting for NYRA construction and operational activities even though they may not occur by the 2021 analysis year, including the potential introduction of night racing.

Night racing was considered in the future No Action condition in the EIS. The addition of night racing, which has not yet been authorized by the NY State Legislature and is not currently offered at Belmont Park, would not affect the conclusions in the EIS because the lead agency has required that if night racing is approved, NYAP and NYRA would coordinate in such a manner that night racing would not be scheduled on the same evening as a hockey game, and non-hockey arena events could be scheduled on the same evening as long as the aggregate attendance for both events does not exceed the maximum attendance level for a sold-out hockey game (18,000 seats), the reasonable worst case condition studied in the EIS. This requirement would be a condition of the MEC as well as NYAP’s lease agreement.

GENERAL

GENERAL “IN FAVOR”

Comment G-1: The commenters support the project as it will create economic development opportunities, revitalize the area, create jobs for residents, benefit local businesses, and bring an entertainment destination to Long Island. (Albanese_2304, Anderson_2551, Angietron_135, Arm_2238, Barbarello_2300, Barley_045, Barth_2279, Becker_2285, Becker_2329, Blair_2101, Boldea_TS3_941, Bollhofer_2318, Boudreau_044, Boudreau_2297, Colgan_2197, Cooper_TS4_1025, DelPennino_001, DiCicco_2266, Eberhardt_2088, Fiumara_2265, Galinanes_2250,
Chapter 22: Response to Public Comments


Response G-1: Comment noted.

Comment G-2: The commenters are generally in favor of the Proposed Project. (Albanese_2304, Anderson_2551, Angelos_2314, Angietron_135, Barbarello_2300, Becker_2292, Becker_2329, Berner_2255, Blech_2270, Bleiweiss_2566, Boudreau_2297, Cipolla_2312, Cutrone_2262, Dasrath_2196, Dejesu_TS4_1008, DelPennino_001, DelPennino_2573, Dixon_2280, Dixon_2290, Eberhardt_2088, Fernandes_2556, Fiumara_2265, Gandarella_2293, Garry_2296, Goldman_2274, Grisaitis_2309, Guvrekian_TS4_1014, Harding_NYIBC_2248, Heneghan_2361, Hennelly_2332, Isserlis_142, Jagustyn_2089, Johnson_146, Keating_2308, Kelly_2082, Kiperwashser_2317, Krumbholz_2342, Laron_2289, Larson_2258, Lehman_2364, Leone_2253, Marchesella_TS4_1007, McMahon_2313.00, Mazzotta_037, Newman_2249, Osterwald_2321, Pisarz_2305, Sacco_097, Sarachek_2275, Serravillo_2273, Singer_2252, Stallone_2295, Strianese_099, Takamiya_2334, Teta_2251, Teta_2328, Tracey_2091, Weiner_2256)

Response G-2: Comment noted.

Comment G-3: The commenters support the proposed arena as it will have positive benefits for the Islanders and the larger community. (3girlhaug_2267, Abaro_2298, Arm_2238, Becker_2285, Berner_2554, Blumberg_2264, Bollhofer_2318, Cohen_2259, Cooper_TS4_1025, Curley_TS4_1013, Engle_2315, Gutman_047, Holiat_2284, Jagustyn_2089, Just_2320, Lewis_2291, Longo_2272, McDonough_2549, Muller_2282, Nappi_2319, Pansa_2103, Petrillo_2277, Pollaci_2080, Remsen_2302, Rose_2268, Rote_2257, Schoenig_2086, Segreti_2303, Tyburski_2306, Vetere_2269, Weiner_2256, Zacharewicz_2287, Zucaro_2294)

Response G-3: Comment noted.
GENERAL “IN OPPOSITION”


Response G-4: Specific comments and concerns are addressed separately throughout this response to comments document, and as part of technical chapters in the FEIS.
C. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND GENERAL PROJECT PLAN

ELECTED OFFICIALS AND AGENCIES

2. Gerard M. Bambrick, Village Administrator for Floral Park, oral comments delivered January 8, 2019 (Bambrick_TS1_875) and January 9, 2019 (Bambrick_TS3_948); letter dated March 1, 2019 (VFP_2548)
3. Donna Betty, Chief Planning Officer, Long Island Rail Road, letter dated February 11, 2019 (Betty_LIRR_2176)
4. Judi Bosworth, Supervisor, Town of North Hempstead, email dated February 6, 2019 (Bosworth_2100)
5. John Carlapasso, Bellrose Fire Department, oral comments delivered January 9, 2019 (Carlapasso_TS3_940)
6. Archie Cheng, Trustee Village of Floral Park, oral comments delivered January 8, 2019 (Cheng_TS1_881)
7. Leroy Comrie, New York State Senate, letter dated January 10, 2019 (Comrie_104) and oral comments delivered January 10, 2019 (Comrie_TS4_968)
8. Laura Curran, Nassau County Executive, letter dated March 1, 2019 (Curran_2564)
9. Michael Dantana, Superintendent, Floral Park School District, oral comments delivered January 9, 2019 (Dantana_TS2_895)
11. William Doherty, Floral Park Police Department, oral comments delivered January 9, 2019 (Doherty_TS2_897)
12. Laura Ferone, Floral Park Board of Education, oral comments delivered January 9, 2019 (Ferone_TS2_926)
13. Kevin Fitzgerald, Deputy Mayor, Floral Park, oral comments delivered January 8, 2019 (Fitzgerald_TS1_857) and January 10, 2019 (Fitzgerald_TS4_975); letter dated March 1, 2019 (Fitzgerald_2363)
14. Laura A. Gillen, Supervisor, Town of Hempstead, oral comments delivered January 9, 2019 (Gillen_TS3_934) and letter dated March 1, 2019 (Gillen_2568)
15. Barry Grodenchik, Councilman, oral comments delivered January 10, 2019 (Grodenchik_TS4_971)
16. Frank Gunther, Floral Park Mayor's Task Force, oral comments delivered January 9, 2019 (Gunther_TS3_938)
17. Joseph Juliano, Deputy Mayor, Bellerose, oral comments delivered January 9, 2019 (Juliano_TS2_915)
18. Todd Kaminsky, New York State Senate, oral comments delivered January 8, 2019 (Kaminsky_TS1_845)
19. Anna Kaplan, New York State Senate, oral comments delivered January 10, 2019 (Kaplan_TS4_967) and letter dated March 1, 2019 (Kaplan_2550)

1 Citations in parentheses refer to internal comment tracking annotations.
20. Martin Katz, Nassau County DPW, oral comments delivered January 10, 2019 (Katz_TS4_973)
21. Dominick Longobardi, Mayor, Floral Park, oral comments delivered January 8, 2019 (Longobardi_TS1_856) and January 10, 2019 (Longobardi_TS4_1029)
22. Stephen McAllister, Commissioner, Floral Park Police Department, oral comments delivered January 8, 2019 (McAllister_TS1_867)
24. Richard Nicolello, Nassau County Legislature, oral comments delivered January 9, 2019 (Nicolello_TS2_925)
25. Lynn Pombonyo, Floral Park Board of Trustees, oral comments delivered January 8, 2019 (Pombonyo_TS1_862)
26. Dr. Lynn Pombonyo, Trustee, Floral Park Board of Trustees, oral comments delivered January 9, 2019 (Pombonyo_TS2_917) and January 10, 2019 (Pombonyo_TS4_1031); letter dated March 1, 2019 (Pomboyno_2398)
27. Edward P. Ra, New York State Assembly, oral comments delivered January 10, 2019 (Ra_TS4_969) and letter dated March 1, 2019 (Ra_2571)
28. Sean E. Sallie, Deputy Commissioner, Nassau County Department of Public Works, letter dated March 1, 2019 (Sallie_NCDPW_2544)
29. Hilary Semel, Director and General Counsel, Mayor's Office of Environmental Coordination, letter dated March 1, 2019 (Semel_MOEC_2561)
30. Carrie Solages, Nassau County Legislature, oral comments delivered January 8, 2019 (Solages_TS1_855)
31. Michelle Solages, New York State Assembly, oral comments delivered January 10, 2019 (Solages_TS4_995) and letter dated March 1, 2019 (Solages_2402)
32. Scott Stringer, New York City Comptroller, letter dated December 17, 2018 (Stringer_144)
33. Robert Swartz, Water Authority of Western Nassau County, email dated February 11, 2019 (Swartz_WAWNC_2175)
34. Polly Trottenberg, Commissioner, New York City Department of Transportation, letter dated March 1, 2019 (NYCDOT_2562)
35. Paul A. Vallone, New York City Council, letter dated February 22, 2019 (Vallone_2261)
36. David Viana, for Nassau County Exec Laura Curran, oral comments delivered January 9, 2019 (Viana_TS2_919)
37. David P. Weiss, Chairman, Town of Hempstead Planning Board, letter dated February 28, 2019 (Weiss_THPB_2357)
38. Village of Floral Park, letters dated March 1, 2019 (VFP_2547), March 19, 2019 (VFP_2574), and April 3, 2019 (VFP_2576)

**GENERAL PUBLIC**

39. 3girlhaug, email dated February 24, 2019 (3girlhaug_2267)
40. Ricky Abarno, email dated February 24, 2019 (Abarno_2298)
41. Carl Achille, email dated December 16, 2018 (Achille_019) and oral comments delivered January 10, 2019 (Achille_TS4_1024)
42. Vasili Agelos, email dated February 25, 2019 (Agelos_2314)
43. Nicholas Albanese, email dated February 25, 2019 (Albanese_2304)
Chapter 22: Response to Public Comments

2019 (Alfonsi_2347), February 28, 2019 (Alfonsi_2349), February 28, 2019 (Alfonsi_2353), February 28, 2019 (Alfonsi_2360), February 28, 2019 (Alfonsi_2367), February 28, 2019 (Alfonsi_2368), March 1, 2019 (Alfonsi_2400), March 1, 2019 (Alfonsi_2537), March 1, 2019 (Alfonsi_2538), March 1, 2019 (Alfonsi_2539), March 1, 2019 (Alfonsi_2540), February 26, 2019 (Alfonsi_2567); oral comments delivered January 8, 2019 (Alfonsi_TS1_871) (Alfonsi_TS1_872), January 9, 2019 (Alfonsi_TS3_953), and January 10, 2019 (Alfonsi_TS4_1030)

45. Virginia Amato, oral comments delivered January 8, 2019 (Amato_TS1_846) and January 9, 2019 (Amato_TS3_935); oral comment notes received March 1, 2019 (Amato_2362)

46. Ken Anderson, email dated March 1, 2019 (Anderson_2551)
47. Angietron, email dated January 13, 2019 (Angietron_135)
48. Ben Anna, email dated January 10, 2019 (Anna_055)
49. Anonymous, email dated January 10, 2019 (Anonymous_083)
50. Anonymous, email dated January 11, 2019 (Anonymous_084)
51. Christopher Anskat, email dated March 1, 2019 (Anskat_2397)
52. Mirna Arbelaez, oral comments delivered January 9, 2019 (Arbelaez_TS3_955)
53. Brian Arm, email dated February 16, 2019 (Arm_2238)
54. J B, email dated March 1, 2019 (JB_2553)
55. Andrea Baggott, email dated February 9, 2019 (Baggott_2143)
56. Daniel Baggott, email dated February 26, 2019 (Baggott_2331)
57. Elizabeth Bailey, email dated January 10, 2019 (Bailey_042)
58. Ed Bailey, email dated February 13, 2019 (Bailey_2201)
59. Christopher Barbarello, email dated February 24, 2019 (Barbarello_2300)
60. Scott Barley, email dated January 10, 2019 (Barley_045)
61. Faye Barth, email dated February 24, 2019 (Barth_2279)
62. John Bayat, email dated February 7, 2019 (Bayat_2105)
63. Lewis Bazakos, email dated January 10, 2019 (Bazakos_041)
64. Andrew Becker, email dated February 24, 2019 (Becker_2285)
65. Alexander Becker, email dated February 24, 2019 (Becker_2292)
66. Don Becker, email dated February 27, 2019 (Becker_2329)
67. Roman Bellusci, email dated February 25, 2019 (Bellusci_2316)
68. Mark Berner, emails dated February 22, 2019 (Berner_2255) and March 1, 2019 (Berner_2554)
69. Anabelle Bizante, oral comments delivered January 9, 2019 (Bizante_TS3_961)
70. Vin Blair, email dated February 6, 2019 (Blair_2101)
71. Jared Blech, email dated February 23, 2019 (Blech_2270)
72. Hal Bleiweiss, email dated March 7, 2019 (Bleiweiss_2566)
73. Bryan Block, President, Cambria Heights Civic Association, email dated January 8, 2019 (Block_CHCA_133)
74. Phil Blumberg, email dated February 22, 2019 (Blumberg_2264)
75. Lauren Boldea, oral comments delivered January 9, 2019 (Boldea_TS3_941)
76. William Bollhofer, email dated February 25, 2019 (Bollhofer_2318)
77. Dana Bonomo, oral comments delivered January 10, 2019 (Bonomo_TS4_1020)
78. Kenneth Boudreau, emails dated January 10, 2019 (Boudreau_044) and February 24, 2019 (Boudreau_2297)
79. Loretta Braun, letter dated February 28, 2019 (Braun_2348)
80. Jessica Brown, oral comments delivered January 9, 2019 (Brown_TS2_928)
81. Chester Brown, oral comments delivered January 10, 2019 (Brown_TS4_974)
82. Patricia Browne, oral comments delivered January 8, 2019 (Browne_TS1_853)
83. Mary Brush, email dated January 11, 2019 (Brush_130)
84. Steven Buckvar, email dated January 30, 2019 (Buckvar_1054)
85. Richard Burgess, email dated February 25, 2019 (Burgess_2310)
86. Matthew Cacciato, oral comments delivered January 9, 2019 (Cacciato_TS3_966)
87. Joanne Caldon, oral comments delivered January 9, 2019 (Caldon_TS2_910)
88. Eileen Carrig, email dated January 11, 2019 (Carrig_TS4_987) and oral comments delivered January 10, 2019 (Carrig_TS4_989)
89. John Casey, email dated February 6, 2019 (Casey_2099)
90. George Chakery, email dated February 22, 2019 (Chakery_2260)
91. Ed Chatterton, oral comments delivered January 9, 2019 (Chatterton_TS2_903)
92. Lea Chatterton, oral comments delivered January 9, 2019 (Chatterton_TS2_904)
93. Nicole Chatterton, oral comments delivered January 9, 2019 (Chatterton_TS2_905)
94. Steven Cheng, emails dated January 8, 2019 (Cheng_014) (Cheng_109)
95. Frank Chiara, oral comments delivered January 9, 2019 (Chiara_TS3_959)
96. Venetia Chiara, oral comments delivered January 9, 2019 (Chiara_TS3_960)
97. Jennifer Chu, email dated January 10, 2019 (Chu_093)
98. Joseph Cinquemani, oral comments delivered January 9, 2019 (Cinquemani_TS3_962)
99. Joe Cipolla, email dated February 25, 2019 (Cipolla_2312)
100. Aaron Cohen, email dated February 23, 2019 (Cohen_2259)
101. Bill Colgan, email dated February 12, 2019 (Colgan_2197)
102. James Compo, email dated January 7, 2019 (Compo_010)
103. Leroy Comrie, letter dated January 10, 2019 (Comrie_134)
104. Janice Conterelli, email dated January 8, 2019 (Conterelli_017)
105. Mary Harkins, Conway, oral comments delivered January 10, 2019 (Conway_TS4_1035)
106. Jon, Cooper, oral comments delivered January 10, 2019 (Cooper_TS4_1025)
107. Jeannette, Cornell, email dated January 4, 2019 (Cornell_129)
108. Amy Corrigan, email dated January 10, 2019 (Corrigan_054)
109. Cecily Coven, letters dated February 7, 2019 (Coven_2230) (Coven_2231) (Coven_2232)
110. MaryAnn Cuite, oral comments delivered January 10, 2019 (Cuite_TS4_984)
111. Michael L. Culotta, letter dated February 28, 2019 (Culotta_2365)
112. Dr. Maria Culotta, letter dated February 28, 2019 (Culotta_2572)
113. Michael Culotta, oral comments delivered January 8, 2019 (Culotta_TS1_890), January 9, 2019 (Culotta_TS3_963), and January 10, 2019 (Culotta_TS4_1036)
114. Barbara Cunningham, oral comments delivered January 10, 2019 (Cunningham_TS4_989)
115. Deirdre Cunningham, oral comments delivered January 10, 2019 (Cunningham_TS4_1023)
116. Greg Curley, oral comments delivered January 10, 2019 (Curley_TS4_1013)
117. Victor Cutrone, email dated February 22, 2019 (Cutrone_2262)
118. Susan D’Amico, email dated January 14, 2019 (DAmico_088)
119. Dale Davids, email dated February 21, 2019 (Davids_2244)
120. Ciro DelPennino, emails dated December 31, 2018 (DelPennino_001) and March 18, 2019 (DelPennino_2573)
121. Rita deRose, email dated December 31, 2018 (deRose_002)
Chapter 22: Response to Public Comments

122. Jeff DiCicco, email dated February 23, 2019 (DiCicco_2266)
123. Marcia Diffley, email dated March 1, 2019 (Diffley_2560)
124. Craig Dixon, email dated February 24, 2019 (Dixon_2280)
125. Jennifer Dixon, email dated February 24, 2019 (Dixon_2290)
126. Beth Dixon, oral comments delivered January 10, 2019 (Dixon_TS4_1015)
127. James Dobson, oral comments delivered January 9, 2019 (Dobson_TS2_916)
128. Lawrence Donnelly, email dated February 28, 2019 (Donnelly_2355)
129. Bridg Donnelly, email dated February 28, 2019 (Donnelly_2356)
130. Donna Doyle, email dated January 31, 2019 (Doyle_1055)
131. Maria & Rudy Eberhardt, email dated February 5, 2019 (Eberhardt_2088)
132. Richard Ehrlich, email dated December 29, 2018 (Ehrlich_004)
133. Phil Engle, email dated February 25, 2019 (Engle_2315)
134. Patrice English-Young, email dated January 30, 2019 (English-Young_1052)
135. Ken Fairben, oral comments delivered January 10, 2019 (Fairben_TS4_994)
136. Stephanie Fattorini, email dated January 13, 2019 (Fattorini_136)
137. Michael Fernandes, email dated March 1, 2019 (Fernandes_2556)
138. Mark Fishbein, oral comments delivered January 9, 2019 (Fishbein_TS2_920)
139. Glynn-Ellen Fischelli, letter dated January 18, 2019 (Fischelli_2065)
140. Douglas Fiumara, email dated February 22, 2019 (Fiumara_2265)
141. Kevin Flood, emails dated March 1, 2019 (Flood_2394) (Flood_2395) (Flood_2396); oral comments delivered January 8, 2019 (Flood_TS1_892) and January 9, 2019 (Flood_TS3_945)
142. Kristin Flood, oral comments delivered January 10, 2019 (Flood_TS4_1026)
143. Craig Forbes, oral comments delivered January 10, 2019 (Forbes_TS4_1021)
144. Randy Friederich, oral comments delivered January 8, 2019 (Friederich_TS1_877)
145. Franc Galinanes, email dated February 21, 2019 (Galinanes_2250)
146. Danny Gandarela, email dated February 24, 2019 (Gandarela_2293)
147. Christian Garry, email dated February 24, 2019 (Garry_2296)
148. Erin Gayron, oral comments delivered January 10, 2019 (Gayron_TS4_991)
149. Christine Gietschier, email dated February 7, 2019 (Gietschier_2106)
150. Giraldo, email dated January 10, 2019 (Giraldo_035)
151. Robert Goldman, email dated February 23, 2019 (Goldman_2274)
152. Riselli Gonzalez, oral comments delivered January 8, 2019 (Gonzalez_TS1_847)
153. Nancy Gorry, oral comments delivered January 10, 2019 (Gorry_TS1_1010)
154. Judith Greene, oral comments delivered January 9, 2019 (Greene_TS2_924)
155. Kevin Greene, oral comments delivered January 9, 2019 (Greene_TS3_944)
156. Bruce Greif, email dated January 11, 2019 (Greif_094)
157. Phillip Gribbins, letter dated February 2, 2019 (Gribbins_2070)
158. Ann Gribbins, oral comments delivered January 9, 2019 (Gribbins_TS2_907)
159. Mike Grisaitis, email dated February 25, 2019 (Grisaitis_2309)
160. Nancy Gross, oral comments delivered January 8, 2019 (Gross_TS1_858)
161. Jack Guevrekian, oral comments delivered January 10, 2019 (Guevrekian_TS4_1014)
162. Francis Gunther, letter dated February 27, 2019 (Gunther_2344)
163. Frank Gunther, oral comments delivered January 8, 2019 (Gunther_TS1_865)
164. Paul Gustavson, oral comments delivered January 9, 2019 (Gustavson_TS2_933)
165. Jeff Guttman, email dated January 10, 2019 (Guttman_047)
166. Lori Halop, oral comments delivered January 10, 2019 (Halop_TS4_999)
167. Paul Hanson, oral comments delivered January 9, 2019 (Hanson_TS3_957)
168. Steven Hargett, email dated January 8, 2019 (Hargett_023)
169. Janice Harnett, oral comments delivered January 10, 2019 (Harnett_TS4_1037)
170. David Harrington, letter dated February 1, 2019 (Harrington_2067)
171. Brion Hathaway, email dated February 5, 2019 (Hathaway_2090)
172. Maureen Heeb, oral comments delivered January 10, 2019 (Heeb_TS4_1017)
173. Sean Heneghan, email dated February 24, 2019 (Heneghan_2286)
175. Erin Hennelly, email dated February 27, 2019 (Hennelly_2332)
176. Lynn Henry, email dated February 23, 2019 (Henry_2301)
177. Dr. Marta Hernandez, oral comments delivered January 10, 2019 (Hernandez_TS4_983)
178. Constance Higdon, oral comments delivered January 9, 2019 (Higdon_TS2_923)
179. George Holiat, email dated February 24, 2019 (Holiat_2284)
180. Nadia Holubnyczyj-Ortiz, email dated February 28, 2019 (Holubnyczyj-Ortiz_2350)
181. Jonathan Horn, oral comments delivered January 10, 2019 (Horn_TS4_982)
182. Nadia Howubnyczyk, oral comments delivered January 8, 2019 (Howubnyczyk_TS1_851)
183. J.D. Hummel, email dated February 24, 2019 (Hummel_2288)
184. Michael Isserlis, email dated January 15, 2019 (Isserlis_142)
185. Michael Jacob, oral comments delivered January 9, 2019 (Jacob_TS3_954)
186. Damian Jagustyn, email dated February 5, 2019 (Jagustyn_2089)
187. Claude Jean Pierre, oral comments delivered January 9, 2019 (Jean Pierre_TS3_937)
188. Bladimir Jimenez, email dated February 21, 2019 (Jimenez_2246)
189. John Johnson, email dated January 17, 2019 (Johnson_146)
190. Josh Johnson, email dated January 30, 2019 (Johnson_1051)
191. Jon Johnson, Sr., email dated January 7, 2019 (Johnson_115)
192. Melissa Just, email dated February 25, 2019 (Just_2320)
193. Matt Kamper, oral comments delivered January 9, 2019 (Kamper_TS2_927)
194. Frank Kaplan, email dated February 5, 2019 (Kaplan_2083)
195. Susan Kaye, oral comments delivered January 9, 2019 (Kaye_TS2_921)
196. Danny Keating, email dated February 25, 2019 (Keating_2308)
197. Amy Kelleher, oral comments delivered January 8, 2019 (Kelleher_TS1_859)
198. Bill Kellher, oral comments delivered January 10, 2019 (Kellher_TS4_997)
199. Brendan Kelly, email dated February 5, 2019 (Kelly_2082)
200. Kevin Kennedy, email dated January 10, 2019 (Kennedy_046)
201. Frank Keryc, email dated February 5, 2019 (Keryc_2081)
202. Michael King, oral comments delivered January 9, 2019 (King_TS2_914)
203. Eric Kiperwassser, email dated February 25, 2019 (Kiperwassser_2317)
204. Phil Konigsberg, email dated January 11, 2019 (Konigsberg_089)
205. Richard Krumbholz, email dated February 27, 2019 (Krumbholz_2342)
206. Thomas A. Kubler, email dated January 14, 2019 (Kubler_131)
207. Arek Kurckciyan, email dated February 23, 2019 (Kurckciyan_2271)
208. Ella Laguerre, email dated January 11, 2019 (Laguerre_105)
209. Laliguori, email dated February 5, 2019 (Laliguori_2079)
210. Robert Landers, emails dated January 28, 2019 (Landers_1043), February 21, 2019 (Landers_2243), and March 25, 2019 (Landers_2575)
211. Carl Laron, email dated February 24, 2019 (Laron_2289)
212. Bryan Larson, email dated February 23, 2019 (Larson_2258)
213. George Lasher, email dated January 11, 2019 (Lasher_082)
Chapter 22: Response to Public Comments

214. Ronda Lauria, email dated January 3, 2019 (Lauria_095)
215. Cord Lehman, letter dated February 27, 2019 (Lehman_2364)
216. Timothy Leonard, email dated March 2, 2019 (Leonard_2565)
217. Michael Leone, email dated February 21, 2019 (Leone_2253) and February 22, 2019 (Leone_2254)
218. Elizabeth Lewis, email dated February 24, 2019 (Lewis_2291)
219. Elaine Licari, oral comments delivered January 10, 2019 (Licari_TS4_1033)
220. Betsy Liebmann, email dated January 21, 2019 (Liebmann_149) and oral comments delivered January 10, 2019 (Liebmann_TS4_981)
221. Andrew London, email dated February 22, 2019 (London_2245)
222. Patrick Longo, email dated February 23, 2019 (Longo_2272)
223. Michael Lopez, email dated March 1, 2019 (Lopez_2557)
224. Randy Lunenfeld, email dated February 28, 2019 (Lunenfeld_2345)
225. Dean Lykos, oral comments delivered January 10, 2019 (Lykos_TS4_988)
226. Maureen MacDonald, email dated February 5, 2019 (MacDonald_2095)
227. Duncan MacDonald, email dated February 28, 2019 (MacDonald_2354)
228. Douglas Madden, oral comments delivered January 9, 2019 (Madden_TS3_956)
229. Martin Maguire, email dated January 23, 2019 (Maguire_1041)
230. Ryan Maher, email dated February 23, 2019 (Maher_2276)
231. J Malfonsi, emails dated March 1, 2019 (Malfonsi_2558) (Malfonsi_2559)
232. Kathleen Mannle, email dated March 1, 2019 (Mannle_2543)
233. Gilbert Marcelin, oral comments delivered January 9, 2019 (Marcelin_TS3_964)
234. Myron Marinbach, email dated January 9, 2019 (Marinbach_021)
235. Patricia Martinez, oral comments delivered January 9, 2019 (Martinez_TS2_896)
236. Kurt Maurer, email dated January 8, 2019 (Maurer_011) and oral comments delivered January 9, 2019 (Maurer_TS2_931)
237. Joe Mazzotta, email dated January 10, 2019 (Mazzotta_037)
238. Charles McArulla, oral comments delivered January 9, 2019 (McArulla_TS3_965)
239. Frank McCaffrey, oral comments delivered January 10, 2019 (McCaffrey_TS4_976)
240. Heather McClintock, oral comments delivered January 9, 2019 (McClintock_TS3_958)
241. Brenda McDonald, oral comments delivered January 8, 2019 (McDonald_TS1_882)
242. John McDonough, email dated March 1, 2019 (McDonough_2549)
243. Dennis McEnery, emails dated February 27, 2019 (McEnery_2336) (McEnery_2337) (McEnery_2338) (McEnery_2340) (McEnery_2341) (McEnery_2343), February 28, 2019 (McEnery_2352) (McEnery_2358), March 1, 2019 (McEnery_2392) (McEnery_2393), and oral comments delivered January 10, 2019 (McEnery_TS4_1038)
244. Matthew D. McGeever, letter dated March 1, 2019 (McGeever_2555)
246. Jerry McGowan, oral comments delivered January 8, 2019 (McGowan_TS1_864)
248. James McGuire, oral comments delivered January 9, 2019 (McGuire_TS2_912)
249. Brian McGunnigle, email dated January 8, 2019 (McGunnigle_015)
250. Brian McHale, emails dated January 6, 2019 ( McHale_126) and February 25, 2019 ( McHale_2281)
251. James McLoughlin, email dated January 11, 2019 (McLoughlin_102)
252. Jerry McMahon, email dated February 25, 2019 (McMahon_2313)
253. Jon McNally, email dated March 1, 2019 (McNally_2552)
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

254. Russell Mesnick, oral comments delivered January 8, 2019 (Mesnick_TS1_870) and email dated February 15, 2019 (Mesnick_2237)
255. Don Mezzetti, emails dated January 16, 2019 (Mezzetti_100) and February 2, 2019 (Mezzetti_2071)
256. Karen Milazzo, email dated February 14, 2019 (Milazzo_2203)
257. Kimberly Mitchell, email dated February 11, 2019 (Mitchell_2569)
258. Joel Mittler, email dated January 30, 2019 (Mittler_1053)
259. Raymond Mohler, Jr., email dated February 27, 2019 (Mohler, Jr._2339)
260. Deirdre Moore, oral comments delivered January 9, 2019 (Moore_TS3_952)
261. Thomas Morgan, email dated February 28, 2019 (Morgan_2351)
262. Thomas Morgo, emails dated February 20, 2019 (Morgo_2241) and February 26, 2019 (Morgo_2327)
263. Sheila Moriarty, oral comments delivered January 10, 2019 (Moriarty_TS4_1004); emails dated February 9, 2019 (Moriarty_TS4_1044) and March 1, 2019 (Moriarty_TS4_2536)
264. Timothy Moroney, oral comments delivered January 8, 2019 (Moroney_TS1_891)
265. Katy Motley, email dated January 11, 2019 (Motley_081)
266. Donald R. Moy, email dated January 19, 2019 (Moy_148)
267. Ann Moynagh, oral comments delivered January 10, 2019 (Moynagh_TS4_1022)
268. John Mulhall, oral comments delivered January 8, 2019 (Mulhall_TS1_866)
269. Andre Muller, email dated February 24, 2019 (Muller_2282)
270. Ann McCormack Murphy, email dated December 29, 2018 (Murphy_003)
271. Joe Nappi, email dated February 25, 2019 (Nappi_2319)
272. Brian Naughton, oral comments delivered January 10, 2019 (Naughton_TS4_1012)
273. Beatrice Necerino, oral comments delivered January 9, 2019 (Necerino_TS2_913)
274. Steve Newman, email dated February 21, 2019 (Newman_2249)
275. Marc Nicols, email dated January 9, 2019 (Nicols_025)
276. John O'Donnell, email dated February 21, 2019 (O'Donnell_2247)
277. Laura O'Gorman, email dated January 12, 2019 (OGorman_137)
278. William O'Hagan, email dated January 10, 2019 (OHagan_053)
279. 7th Grade OLV Basketball Team, oral comments delivered January 10, 2019 (OLV Basketball Team_TS4_2068)
280. Frank Osterwald, email dated February 25, 2019 (Osterwald_2321)
281. Toni Palamar, email dated February 20, 2019 (Palamar_2240)
282. Stephen Pansa, email dated February 7, 2019 (Pansa_2103)
283. Joe Pelletiere, oral comments delivered January 9, 2019 (Pelletiere_TS2_908)
284. Adele Pellicane, email dated January 10, 2019 (Pellicane_051)
285. Ondina Pena, email dated January 1, 2019 (Pena_005)
286. Shoshana Penstein, email dated February 24, 2019 (Penstein_2299)
287. James Peterson, emails dated January 13, 2019 (Peterson_139) January 14, 2019 (Peterson_140) February 14, 2019 (Peterson_2236) March 16, 2019 (Peterson_2577) and April 8, 2019 (Peterson_2578)
288. James Petrillo, email dated February 22, 2019 (Petrillo_2277)
289. Mary Petrosino, oral comments delivered January 9, 2019 (Petrosino_TS2_901) and letter dated January 18, 2019 (Petrosino_2066)
290. Richard Pfeiffer, oral comments delivered January 9, 2019 (Pfeiffer_TS2_899)
291. Felicia Pisarz, email dated February 25, 2019 (Pisarz_2305)
292. Joe Pollaci, email dated February 5, 2019 (Pollaci_2080)
293. Jean Post, email dated January 10, 2019 (Post_091)
Chapter 22: Response to Public Comments

294. Susan Powderly, email dated January 3, 2019 (Powderly_006)
295. Daniel Praino, oral comments delivered January 9, 2019 (Praino_TS3_946)
296. Andrew V. Pulcini, email dated January 9, 2019 (Pulcini_022)
297. Kathryn Quaderer, email dated February 25, 2019 (Quaderer_2311)
298. Angela Ragusa, email dated February 4, 2019 (Ragusa_2069)
299. John Rakowski, oral comments delivered January 9, 2019 (Rakowski_TS2_909) and email dated February 6, 2019 (Rakowski_2098)
300. Charles Razenson, oral comments delivered January 10, 2019 (Razenson_TS4_990)
301. Janet Reed, oral comments delivered January 9, 2019 (Reed_TS2_932)
302. Christy Reisig, oral comments delivered January 8, 2019 (Reisig_TS1_861) (Reisig_TS1_1046), January 9, 2019 (Reisig_TS3_949), and email dated March 1, 2019 (Colgan_2542)
303. Zachary Remsen, email dated February 25, 2019 (Remsen_2302)
304. Raymond F. Riebe, email dated February 5, 2019 (Riebe_2075)
305. Darrell Rikert, email dated February 13, 2019 (Rikert_2202)
306. Krissy Roleke, oral comments delivered January 10, 2019 (Roleke_TS4_1018)
307. Jack Rose, email dated February 23, 2019 (Rose_2268)
308. Joe Rossi, email dated February 21, 2019 (Rossi_2242)
309. Tyler Rote, email dated February 22, 2019 (Rote_2257)
310. Chris Sacco, email dated January 9, 2019 (Sacco_097)
311. Pat Salmon, oral comments delivered January 9, 2019 (Salmon_TS3_942)
312. Jim Sandas, email dated January 9, 2019 (Sandas_034)
313. Joshua Sarachek, email dated February 23, 2019 (Sarachek_2275)
314. Robert Sarro, oral comments delivered January 8, 2019 (Sarro_TS1_888)
315. Deborah Sawicki, oral comments delivered January 9, 2019 (Sawicki_TS2_911)
316. Peggy Schlechter, oral comments delivered January 9, 2019 (Schlechter_TS3_943)
317. Brian Schmidt, email dated February 25, 2019 (Schmidt_2278)
318. John Schoenig, email dated February 5, 2019 (Schoenig_2086)
319. Laura Sciara, oral comments delivered January 9, 2019 (Sciara_TS2_906) and letter dated February 1, 2019 (Sciara_2233)
320. Matt Segreti, email dated February 25, 2019 (Segreti_2303)
321. Anthony Serravillo, email dated February 23, 2019 (Serravillo_2273)
322. Marie Sexton, emails dated January 10, 2019 (Sexton_048) (Sexton_049)
323. Matthew Sexton, oral comments delivered January 8, 2019 (Sexton_TS1_876) and January 10, 2019 (Sexton_TS4_1028)
324. John Sexton, oral comments delivered January 10, 2019 (Sexton_TS4_1011)
325. Victoria Sferlazza, email dated February 22, 2019 (Sferlazza_2263)
326. Scott Singer, email dated February 21, 2019 (Singer_2252)
327. Coleen Smith, emails dated January 9, 2019 (Smith_018) and February 5, 2019 (Smith_2078)
328. Bernadette Smith, oral comments delivered January 8, 2019 (Smith_TS1_889) and January 10, 2019 (Smith_TS4_1016) and email dated March 1, 2019 (Smith_2570)
329. Kristen Spina, email dated January 11, 2019 (Spina_085)
330. R Stacom, letter dated January 14, 2019 (Stacom_844)
331. Michael Stallone, email dated February 24, 2019 (Stallone_2295)
332. Frederic Stark, email dated February 25, 2019 (Stark_2307)
333. Jack Stetson, oral comments delivered January 8, 2019 (Stetson_TS1_894)
334. Steven, email dated February 6, 2019 (Steven_2102)
335. Joyce Stowe Chair Tudor Manor Civic Association, email dated January 9, 2019 (TMCA_024)
336. Anthony Strianese, email dated January 13, 2019 (Strianese_099)
337. Joan Sullivan, email dated February 28, 2019 (Sullivan_2359)
338. Michael Sussman, oral comments delivered January 8, 2019 (Sussman_TS1_880)
339. Simmonie Swaby, oral comments delivered January 8, 2019 (Swaby_TS1_885)
340. Rieko Takamiya, email dated February 27, 2019 (Takamiya_2334)
341. Amanda Talty, oral comments delivered January 9, 2019 (Talty_TS2_929)
342. Jeff Tannenbaum, email dated February 5, 2019 (Tannenbaum_2076)
343. Kevin Teixeira, email dated February 28, 2019 (Teixeira_2366)
344. Ann Terry, oral comments delivered January 10, 2019 (Terry_TS4_1032)
345. Paul Teta, emails dated January 10, 2019 (Teta_036) and February 22, 2019 (Teta_2251)
346. Erin Teta, email dated February 27, 2019 (Teta_2328)
347. Tommy, email dated January 10, 2019 (Tommy_040)
348. Scott Tompkins, email dated March 1, 2019 (Tompkins_2401)
349. Tony, email dated February 4, 2019 (Tony_2084)
350. Patrick Tracey, email dated February 5, 2019 (Tracey_2091)
351. Kate Trainor, oral comments delivered January 8, 2019 (Trainor_TS1_854)
352. Marina Trentacoste, oral comments delivered January 9, 2019 (Trentacoste_TS2_902)
353. Laura Trentacoste, oral comments delivered January 10, 2019 (Trentacoste_TS4_1019)
354. Thomas Tweedy, former Mayor of Floral Park, oral comments delivered January 8, 2019 (Tweedy_TS1_893) and January 10, 2019 (Tweedy_TS4_1039)
355. Doug Tyburski, email dated February 25, 2019 (Tyburski_2306)
356. Unknown, letter dated March 1, 2019 (Unknown_2580)
357. John Venti, email dated January 5, 2019 (Venti_009)
358. Damon Vetere, email dated February 23, 2019 (Vetere_2269)
359. Attilio Viscovich, email dated January 5, 2019 (Viscovich_096)
360. Kathleen Wagner-Tyson, oral comments delivered January 8, 2019 (Wagner-Tyson_TS1_863) and January 9, 2019 (Wagner-Tyson_TS2_918)
361. Michael Walker, oral comments delivered January 10, 2019 (Walker_TS4_978)
362. Michael Walker, Jr, oral comments delivered January 10, 2019 (Walker, Jr_TS4_979)
363. Susan E. Walsh, letter dated January 22, 2019 (Walsh_1040)
364. Maggie Weickert, email dated March 1, 2019 (Weickert_2541)
365. Margaret Weickert, oral comments delivered January 8, 2019 (Weickert_TS1_869)
366. Marilyn Weickert, oral comments delivered January 9, 2019 (Weickert_TS2_900)
367. James Weiner, email dated February 22, 2019 (Weiner_2256)
368. Dana Weissman, oral comments delivered January 9, 2019 (Weissman_TS2_922)
369. Paul Williams, email dated January 11, 2019 (Williams_107)
370. John Yackel, email dated January 4, 2019 (Yackel_008)
371. Jacob Zacharewicz, email dated February 24, 2019 (Zacharewicz_2287)
372. Richard Zimmerman, oral comments delivered January 10, 2019 (Zimmerman_TS4_1000)
373. Jane Zoleta, email dated January 10, 2019 (Zoleta_092)
374. Andrew Zucaro, email dated February 24, 2019 (Zucaro_2294)
Chapter 22: Response to Public Comments

ORGANIZATIONS

375. Eric Alexander, Director, Vision Long Island, oral comments delivered January 8, 2019 (Alexander_TS1_887) and oral comments notes received January 8, 2019 (VLI_2125)
377. Matthew Aracich, Nassau-Suffolk Building Trades, oral comments delivered January 10, 2019 (Aracich_TS4_985)
378. The Belmont Park Community Coalition (BPCC), emails dated January 10, 2019 (BPCC_039), January 14, 2019 (BPCC_132), January 19, 2019 (BPCC_147), January 25, 2019 (BPCC_1042), January 30, 2019 (BPCC_1047), January 31, 2019 (BPCC_1056), January 31, 2019 (BPCC_1057), February 5, 2019 (BPCC_2085), February 6, 2019 (BPCC_2096), February 8, 2019 (BPCC_2126), February 13, 2019 (BPCC_2198) (BPCC_2199) (BPCC_2200), February 27, 2019 (BPCC_2335), March 1, 2019 (BPCC_2545); letters dated January 17, 2019 (BPCC_145) and February 12, 2019 (BPCC_2194) (BPCC_2195)
379. Bryan J. Block, President, Cambria Heights Civic Association, oral comments notes received January 10, 2019 (Block_CHCA_106) and oral comments delivered January 10, 2019 (Block_TS4_972)
380. Richard Browne, NY Arena, oral comments delivered January 10, 2019 (Browne_TS4_992)
381. Sylvia, Cotlia, Jetway Heating and Cooling, oral comments delivered January 9, 2019 (Cotlia_TS3_947)
382. Albert D’Agostino, Committee Against the Mega Mall, oral comments delivered January 8, 2019 (D’Agostino_TS1_884)
383. David Davidson, Concerned Citizens for Floral Park, letter dated April 9, 2019 (CCFP_2579)
384. Thomas Dejesu, NYRA, oral comments delivered January 10, 2019 (Dejesu_TS4_1008)
385. Elmont Against the Megamall, letter dated March 1, 2019 (EAM_2563)
386. Adrienne Esposito, Executive Director, Citizen’s Campaign for the Environment, oral comments delivered January 8, 2019 (Esposito_TS1_848) and letter dated January 11, 2019 (Esposito_CCE_2064) (Esposito_CCE_141) January 11, 2019 (Esposito_CCE_143)
387. Laura Ferone, Floral Park Bellerose BOE, oral comments delivered January 8, 2019 (Ferone_TS1_852)
388. Joseph Fishinger, NV5 Inc, oral comments delivered January 8, 2019 (Fishinger_TS1_868)
389. Rev. Thomas M. Fusco, Pastor, Our Lady of Victory R.C. Church, letter dated February 28, 2019 (Fusco_OLV_2399)
390. Anthony Guerrero, Local 28 Sheet MetalWorkers Union, oral comments delivered January 10, 2019 (Guerrero_TS4_986)
391. Steven Gullo, Elmont Business Kiwanis Club, oral comments delivered January 9, 2019 (Gullo_TS3_939) and January 10, 2019 (Gullo_TS4_1034)
392. Gary Harding, Executive Vice President, New York Islanders Booster Club, email dated February 21, 2019 (Harding_NYIBC_2248)
393. Douglas Hayden, Floral Park Justice, oral comments delivered January 9, 2019 (Hayden_TS2_930)
394. Richard C. Hellenbrecht, Secretary/Treasurer, Bellerose Commonwealth Civic Association, letter dated January 10, 2019 (Hellenbrecht_BCCA_052) and oral comments delivered January 10, 2019 (Hellenbrecht_TS4_996)
395. Jon Johnson, CAC, oral comments delivered January 8, 2019 (Johnson_TS1_860)
396. Christopher Kiernan, Permitting Specialist, PSEG Long Island, email dated January 3, 2019 (PSEG_043)
397. Tiffany Labissiere, 107th Block Association, oral comments delivered January 10, 2019 (Labissiere_TS4_1006)
398. Cheryl Lee, Parkhurst Civic Association, oral comments delivered January 8, 2019 (Lee_TS1_878)
399. Elaine Licari, Citizens' Party Coalition of Resources for Education Wellness, oral comments delivered January 8, 2019 (Licari_TS1_883)
400. Jack Majkut, IBEW Local 25, oral comments delivered January 10, 2019 (Majkut_TS4_980)
401. Syd Mandelbaum, Rock and Whip It Up!, oral comments delivered January 10, 2019 (Mandelbaum_TS4_970)
402. Julie Marchesella, Elmont Chamber of Commerce, oral comments delivered January 10, 2019 (Marchesella_TS4_1007)
403. Rudy Marinacci, Local 176 Ushers/Ticketakers, oral comments delivered January 10, 2019 (Marinacci_TS4_998)
404. Ross McDonald, Elmont Parkhurst Civic Association, oral comments delivered January 9, 2019 (McDonald_TS3_936) and January 10, 2019 (McDonald_TS4_1027)
405. Brenda McDonald, Parkhurst Civic Association, oral comments delivered January 10, 2019 (McDonald_TS4_1001)
406. Dennis McEnery, Floral Park Belmont Task Force and Floral Park Conservation Association, oral comments delivered January 8, 2019 (McEnery_TS1_886) and January 9, 2019 (McEnery_TS3_951)
407. Marc Mullen, West End Civic Association, oral comments delivered January 9, 2019 (Mullen_TS2_898)
408. Joseph O'Grady, Citizens' Party of Floral Park, oral comments delivered January 8, 2019 (O'Grady_TS1_879)
409. Tamar Paoli, Elmont Cultural Center, oral comments delivered January 9, 2019 (Paoli_TS3_950)
410. Parkhurst Civic Association, letter dated December 13, 2018 (PCA_020)
411. Robert Pedley, Floral Park PBA, oral comments delivered January 10, 2019 (Pedley_TS4_993)
412. Aubrey Phillips, Elmont on Line, oral comments delivered January 8, 2019 (Phillips_TS1_874)
413. Reinvent Albany, letter dated January 8, 2019 (RA_013)
414. Paul Sapienza, Elmont Chamber of Commerce, oral comments delivered January 8, 2019 (Sapienza_TS1_873)
415. Bob Savage, SEIF, oral comments delivered January 10, 2019 (Savage_TS4_1003)
416. Steven Schneider, Committee Against the Mega Mall, oral comments delivered January 8, 2019 (Schneider_TS1_849)
417. Melissa Shetler, Political Director, Local 46 Metallic Lathers and Reinforcing Ironworkers, email dated February 11, 2019 (Shetler_L46_2174)
418. Alfreda Simpkins, Executive Board Member, SEIU 32BJ, oral comments notes received January 10, 2019 (Simpkins_SEIU_103) and oral comments delivered January 10, 2019 (Simpkins_TS4_977)
419. Meredith Naughton and Cheryl Spigonardo, Co-Presidents, Floral Park-Bellerose School PTA, letter dated January 31, 2019 (FPBPSTA_2226)
420. Joyce Stowe, Tudor Manor Civic, oral comments delivered January 10, 2019 (Stowe_TS4_1009)
421. Simmonie Swaby, Muscle Moms, email dated January 29, 2019 (Swaby_MM_1045)
422. Dianne Thompson, Tudor Manor Civic, oral comments delivered January 10, 2019 (Thompson_TS4_1002)
423. Brien Weiner, Conservation Co-Chair, South Shore Audubon Society, letter dated February 6, 2019 (Weiner_SSAS_2097)
424. Tammie Williams, Belmont Park Community Coalition (BPCC), oral comments delivered January 8, 2019 (Williams_TS1_850); emails dated January 30, 2019 (BPCC_1048), February 5, 2019 (BPCC_2077), (BPCC_2087), February 7, 2019 (BPCC_2104) (BPCC_2108), February 19, 2019 (BPCC_2239); letter dated January 8, 2019 (Williams_BPCC_012)
425. Travis Williams, NY Islanders, oral comments delivered January 10, 2019 (Williams_TS4_1005)

PETITIONS
426. Clive Walters, Petition February 27, 2019 (Walters_2333)

FORM LETTERS

FORM LETTER 1
427. Jasmine Abel, form letter dated January 10, 2019 (Abel_FL1_459)
428. John Abel, form letter dated January 8, 2019 (Abel_FL1_1846)
429. Karina Acosta, form letter dated March 1, 2019 (Acosta_FL1_2826)
430. Melissa Adler, form letter dated March 1, 2019 (Adler_FL1_2860)
431. Robert Adler, form letter dated March 1, 2019 (Adler_FL1_2866)
432. Joseph M. Alfonso, form letter dated January 8, 2019 (Alfonso_FL1_1845)
433. Jessica Alfonso, form letter dated March 1, 2019 (Alfonso_FL1_2760)
435. Madelaine Aliano, form letter dated January 10, 2019 (Aliano_FL1_353)
436. Pilar Alvarado, form letter dated March 1, 2019 (Alvarado_FL1_2871)
437. Joseph Ambrose, form letter dated March 1, 2019 (Ambrose_FL1_2766)
438. Patricia Ambrose, form letter dated March 1, 2019 (Ambrose_FL1_2767)
439. Karl Anoushian, form letter dated January 8, 2019 (Anoushian_FL1_1948)
440. Karen Anoushian, form letter dated January 8, 2019 (Anoushian_FL1_1951)
441. George Armstrong, form letter dated January 10, 2019 (Armstrong_FL1_422)
442. Linda Armstrong, form letter dated January 10, 2019 (Armstrong_FL1_423)
443. Salvatore Arrigo, form letter dated January 8, 2019 (Arrigo_FL1_1835)
444. Janet Attanasio, form letter dated January 8, 2019 (Attanasio_FL1_2049)
445. Eileen Avigliano, form letter dated March 1, 2019 (Avigliano_FL1_2845)
446. Eric Avigliano, form letter dated March 1, 2019 (Avigliano_FL1_2848)
447. Gail Baccari, form letter dated January 10, 2019 (Baccari_FL1_334)
448. Keith Baccari, form letter dated January 10, 2019 (Baccari_FL1_335)
449. Sandra Bailey, form letter dated January 10, 2019 (Bailey_FL1_450)
450. Mary Ryan Bambrick, form letter dated January 8, 2019 (Bambrick_FL1_1952)
451. Joseph Barlin, form letter dated March 1, 2019 (Barlin_FL1_2872)
452. Jennifer Battaglia, form letter dated January 23, 2019 (Battaglia_FL1_2127)
453. Vincent Battaglia, form letter dated January 23, 2019 (Battaglia_FL1_2128)
454. Theresa Battaglia, form letter dated January 23, 2019 (Battaglia_FL1_2129)
455. Theresa Battaglia, form letter dated March 1, 2019 (Battaglia_FL1_2787)
456. Vincent Battaglia, form letter dated March 1, 2019 (Battaglia_FL1_2788)
457. Jennifer Battaglia, form letter dated March 1, 2019 (Battaglia_FL1_2789)
458. Jaclyn Battyn, form letter dated January 10, 2019 (Battylin_FL1_349)
459. Victoria Baulin, form letter dated March 1, 2019 (Baulin_FL1_2789)
460. L. Beck, form letter dated January 8, 2019 (Beck_FL1_2018)
461. Brendan Beebe, form letter dated March 1, 2019 (Beebe_FL1_2886)
462. Patricia E. Bellear, form letter dated March 1, 2019 (Bellear_FL1_2535)
463. Eileen Bellusci, form letter dated February 4, 2019 (Bellusci_FL1_2215)
464. Vicki Binkley, form letter dated January 8, 2019 (Binkley_FL1_2023)
465. Frank Birkley, form letter dated January 8, 2019 (Birkley_FL1_1955)
466. Stephen Boettcher, form letter dated March 1, 2019 (Boettcher_FL1_2838)
467. Dana Bonomo, form letter dated January 8, 2019 (Bonomo_FL1_1914)
468. Jane M. Bonvicin, form letter dated January 10, 2019 (Bonvicin_FL1_419)
469. Robert Bonvicin, form letter dated January 10, 2019 (Bonvicin_FL1_420)
470. Laura Botka, form letter dated March 1, 2019 (Botka_FL1_2777)
471. Geraldine Brand, form letter dated January 10, 2019 (Brand_FL1_374)
472. George T. Braun, form letter dated March 1, 2019 (Braun_FL1_2474)
473. Teresa Braun, form letter dated March 1, 2019 (Braun_FL1_2479)
474. John Breheny, form letter dated March 1, 2019 (Breheny_FL1_2746)
475. Cristina Brennan, form letter dated January 8, 2019 (Brennan_FL1_1944)
476. Chester A. Brown, form letter dated January 8, 2019 (Brown_FL1_1847)
477. Michael Brown, form letter dated January 16, 2019 (Brown_FL1_2060)
478. Carolyn J. Browne, form letter dated January 10, 2019 (Browne_FL1_421)
479. Werner Bruning, form letter dated March 1, 2019 (Bruning_FL1_2863)
480. Susan Bruning, form letter dated March 1, 2019 (Bruning_FL1_2865)
481. Denis Budek, form letter dated March 1, 2019 (Budek_FL1_2850)
482. Nancy Buechler, form letter dated January 9, 2019 (Buechler_FL1_028)
483. John C. Buechler, form letter dated January 9, 2019 (Buechler_FL1_029)
484. Genevieve Burke, form letter dated March 1, 2019 (Burke_FL1_2744)
485. Ann-Marie Burke, form letter dated March 1, 2019 (Burke_FL1_2851)
486. Carolyn Burke, form letter dated March 1, 2019 (Burke_FL1_2852)
487. Thomas Byrnes, form letter dated January 8, 2019 (Byrnes_FL1_1841)
488. Theresa C, form letter dated March 1, 2019 (C_FL1_2741)
489. Patrick J. Caldon, form letter dated January 10, 2019 (Caldon_FL1_487)
490. Lynn Caleri, form letter dated January 8, 2019 (Caleri_FL1_1876)
491. Catherine Callan, form letter dated January 10, 2019 (Callan_FL1_345)
492. Charles Callan, form letter dated January 8, 2019 (Callan_FL1_2036)
493. Rosalie Cancellarich, form letter dated January 10, 2019 (Cancellarich_FL1_453)
494. Steve Cancellarich, form letter dated January 10, 2019 (Cancellarich_FL1_454)
495. Vincent Cannella, form letter dated March 1, 2019 (Cannella_FL1_2783)
496. Victoria Caponigro, form letter dated January 10, 2019 (Caponigro_FL1_322)
497. Kristin Caputo, form letter dated January 8, 2019 (Caputo_FL1_1950)
Chapter 22: Response to Public Comments

498. John Cardone, form letter dated March 1, 2019 (Cardone_FL1_2764)
499. Joan Cardone, form letter dated March 1, 2019 (Cardone_FL1_2765)
500. Patricia Carmody, form letter dated March 1, 2019 (Carmody_FL1_2784)
501. Elizabeth Carollo, form letter dated January 23, 2019 (Carollo_FL1_2142)
502. Elizabeth Carollo, form letter dated March 1, 2019 (Carollo_FL1_2790)
503. Kevin Carr, form letter dated March 1, 2019 (Carr_FL1_2770)
504. Athena Carr, form letter dated March 1, 2019 (Carr_FL1_2774)
505. Bradley Carrell, form letter dated January 31, 2019 (Carrell_FL1_2210)
506. Erika L. Carrell, form letter dated January 31, 2019 (Carrell_FL1_2211)
507. Eileen Carrig, form letter dated January 8, 2019 (Carrig_FL1_1982)
508. Ann Marie Cartwright, form letter dated January 8, 2019 (Cartwright_FL1_057)
509. Ann Marie Cartwright, form letter dated January 8, 2019 (Cartwright_FL1_2055)
510. Mary Cassidy, form letter dated March 1, 2019 (Cassidy_FL1_2502)
511. Joseph Chalmers, form letter dated January 10, 2019 (Chalmers_FL1_367)
512. Nicole Chattertan, form letter dated January 10, 2019 (Chattertan_FL1_370)
513. Edward Chatterton, form letter dated January 8, 2019 (Chatterton_FL1_1939)
514. Steven Cheng, form letter dated January 8, 2019 (Cheng_FL1_1875)
515. Arlene Chianese, form letter dated March 1, 2019 (Chianese_FL1_2529)
516. Edward Chiody, form letter dated January 8, 2019 (Chiody_FL1_1860)
517. Kathleen M. Clark, form letter dated March 1, 2019 (Clark_FL1_2484)
518. Joseph F. Clements, form letter dated January 8, 2019 (Clements_FL1_2827)
519. Brian Cody, form letter dated January 8, 2019 (Cody_FL1_2032)
520. Glenda Cohen, form letter dated January 8, 2019 (Cohen_FL1_2031)
521. Patricia Comerford, form letter dated March 1, 2019 (Comerford_FL1_2888)
522. Richard J. Comiskey, form letter dated January 8, 2019 (Comiskey_FL1_1915)
523. Winifred Connolly, form letter dated January 8, 2019 (Connolly_FL1_2521)
524. Denise C. Conroy, form letter dated March 1, 2019 (Conroy_FL1_2434)
525. Christine Conway, form letter dated January 10, 2019 (Conway_FL1_372)
526. Terence Coppinger, form letter dated January 8, 2019 (Coppinger_FL1_1908)
527. Ann V. Corbett, form letter dated January 8, 2019 (Corbett_FL1_1826)
528. William J. Corbett, form letter dated January 8, 2019 (Corbett_FL1_1842)
529. Kerryann Corbett-Padro, form letter dated March 1, 2019 (Corbett-Padro_FL1_2750)
530. Ciaran P. Cormican, form letter dated January 10, 2019 (Cormican_FL1_417)
531. Kerry Cormican, form letter dated January 10, 2019 (Cormican_FL1_424)
532. Jeannette Cornell, form letter dated January 4, 2019 (Cornell_FL1_090)
533. Matt Corrigan, form letter dated January 10, 2019 (Corrigan_FL1_432)
534. Amy Corrigan, form letter dated January 8, 2019 (Corrigan_FL1_2014)
535. John R. Cortapasso, form letter dated January 8, 2019 (Cortapasso_FL1_1849)
536. Cecily Coven, form letter dated February 7, 2019 (Coven_FL1_2229)
537. John T. Crawford, form letter dated March 1, 2019 (Crawford_FL1_2460)
538. Kevin Creene, form letter dated January 8, 2019 (Creene_FL1_1937)
539. Sarah Crenshaw, form letter dated January 10, 2019 (Crenshaw_FL1_465)
540. Carri-Ann Crowe, form letter dated January 11, 2019 (Crowe_FL1_2072)
541. William Crowe, form letter dated February 5, 2019 (Crowe_FL1_2092)
542. Laura Cullinan, form letter dated January 23, 2019 (Cullinan_FL1_2137)
543. Raymond Cullinan, form letter dated January 23, 2019 (Cullinan_FL1_2138)
544. Laura Cullinan, form letter dated March 1, 2019 (Cullinan_FL1_2802)
545. Raymond Cullinan, form letter dated March 1, 2019 (Cullinan_FL1_2803)
Michael L. Culotta, form letter dated January 8, 2019 (Culotta_FL1_1838)
Deirdre Cunningham, form letter dated January 10, 2019 (Cunningham_FL1_357)
Neil Cunningham, form letter dated January 10, 2019 (Cunningham_FL1_358)
Barbara Cunningham, form letter dated January 8, 2019 (Cunningham_FL1_1836)
Frank D’Amico, form letter dated January 8, 2019 (D’Amico_FL1_1984)
Susan D’Amico, form letter dated January 8, 2019 (D’Amico_FL1_1985)
Nancy E. Daileader, form letter dated January 8, 2019 (Daileader_FL1_2039)
Cynthia Damato, form letter dated January 10, 2019 (Damato_FL1_446)
Alma Daouaou, form letter dated January 8, 2019 (Daouaou_FL1_1843)
Abdelilah Daouaou, form letter dated January 8, 2019 (Daouaou_FL1_1890)
Eileen Davidson, form letter dated March 1, 2019 (Davidson_FL1_2771)
Patricia Dean, form letter dated January 8, 2019 (Dean_FL1_1830)
Petrina DeGange, form letter dated January 10, 2019 (DeGange_FL1_471)
Dane Delaney, form letter dated March 1, 2019 (Delaney_FL1_2887)
Lee Delia, form letter dated January 10, 2019 (Delia_FL1_445)
Michael DellaCorte, form letter dated January 10, 2019 (DellaCorte_FL1_431)
Denise DellaCorte, form letter dated January 8, 2019 (DellaCorte_FL1_1848)
Anne M. DelPrete, form letter dated January 10, 2019 (DelPrete_FL1_442)
Michael T. Derby, form letter dated January 8, 2019 (Derby_FL1_1963)
Eileen Desoye, form letter dated March 1, 2019 (Desoye_FL1_2745)
Angela DiLorenzo, form letter dated January 8, 2019 (DiLorenzo_FL1_1911)
Elizabeth DiMeo, form letter dated March 1, 2019 (DiMeo_FL1_2832)
Douglas DiMeo, form letter dated March 1, 2019 (DiMeo_FL1_2834)
Jeffrey DiMeo, form letter dated March 1, 2019 (DiMeo_FL1_2835)
Lucille DiMola, form letter dated March 1, 2019 (DiMola_FL1_2751)
Theresa DiPippa, form letter dated January 10, 2019 (DiPippa_FL1_339)
Eileen Dispensa, form letter dated March 1, 2019 (Dispensa_FL1_2813)
Steve Dispensa, form letter dated March 1, 2019 (Dispensa_FL1_2816)
James Dodson, form letter dated January 8, 2019 (Dodson_FL1_1997)
John Dolan, form letter dated January 10, 2019 (Dolan_FL1_462)
Kourtney Dolan, form letter dated January 10, 2019 (Dolan_FL1_463)
Eugene Dolan, form letter dated January 10, 2019 (Dolan_FL1_464)
Diane Dommermuth, form letter dated January 10, 2019 (Dommermuth_FL1_354)
Joan Donnelly, form letter dated January 10, 2019 (Donnelly_FL1_347)
John Donnelly, form letter dated January 8, 2019 (Donnelly_FL1_1965)
Fran Donnelly, form letter dated January 8, 2019 (Donnelly_FL1_1966)
Elaine Doster, form letter dated March 1, 2019 (Doster_FL1_2495)
Vincent Dragone, form letter dated January 10, 2019 (Dragone_FL1_456)
Anna Dragone, form letter dated January 10, 2019 (Dragone_FL1_457)
Theresa Dragone-Meegan, form letter dated January 10, 2019 (Dragone-Meegan_FL1_461)
Patricia Dreyer, form letter dated January 8, 2019 (Dreyer_FL1_1882)
Amy Drogalis, form letter dated March 1, 2019 (Drogalis_FL1_2842)
Monica Drogalis, form letter dated March 1, 2019 (Drogalis_FL1_2844)
John J. Drogalis, form letter dated March 1, 2019 (Drogalis_FL1_2846)
Patricia Drogalis, form letter dated March 1, 2019 (Drogalis_FL1_2847)
Danielle Dunne, form letter dated March 1, 2019 (Dunne_FL1_2894)
Chapter 22: Response to Public Comments

593. Kevin Dunne, form letter dated March 1, 2019 (Dunne_FL1_2895)
594. Nancy Eisenhuth, form letter dated March 1, 2019 (Eisenhuth_FL1_2753)
595. Margaret Elsbeck, form letter dated January 8, 2019 (Elsbeck_FL1_1998)
596. William F. Emmel, form letter dated January 8, 2019 (Emmel_FL1_1877)
597. Patricia D. Eren, form letter dated January 10, 2019 (Eren_FL1_350)
598. Helene Esposito, form letter dated January 22, 2019 (Esposito_FL1_2062)
599. Francis Eusebio, form letter dated January 10, 2019 (Eusebio_FL1_394)
600. Paraskevi Evola, form letter dated January 10, 2019 (Evola_FL1_440)
601. Kenneth B. Fairben, form letter dated January 8, 2019 (Fairben_FL1_1850)
602. Suzanne Falth, form letter dated January 10, 2019 (Falth_FL1_360)
603. Christine M. Farrell, form letter dated January 10, 2019 (Farrell_FL1_321)
604. Christine M. Farrell, form letter dated January 8, 2019 (Farrell_FL1_1820)
605. Christine M. Farrell, form letter dated January 8, 2019 (Farrell_FL1_2028)
606. James C. Farrell, form letter dated January 8, 2019 (Farrell_FL1_2029)
607. Stephanie Fattorini, form letter dated January 8, 2019 (Fattorini_FL1_2034)
608. Ann Faughman, form letter dated March 1, 2019 (Faughman_FL1_2747)
609. Peggy Fenton, form letter dated January 10, 2019 (Fenton_FL1_378)
610. Peter J. Fenton, form letter dated January 8, 2019 (Fenton_FL1_1922)
611. Debra Fenton, form letter dated January 8, 2019 (Fenton_FL1_1949)
613. Susan M. Filshie, form letter dated January 10, 2019 (Filshie_FL1_410)
614. John Filshie, form letter dated January 10, 2019 (Filshie_FL1_411)
615. Lea Fisher, form letter dated March 1, 2019 (Fisher_FL1_2780)
616. Kevin Fitzgerald, form letter dated January 10, 2019 (Fitzgerald_FL1_344)
617. Jennifer Fitzgerald, form letter dated January 8, 2019 (Fitzgerald_FL1_1960)
618. Kathryn Flood, form letter dated January 10, 2019 (Flood_FL1_475)
619. Kathryn Flood, form letter dated January 10, 2019 (Flood_FL1_489)
620. Kristin M. Flood, form letter dated January 8, 2019 (Flood_FL1_1878)
621. Kevin J. Flood, form letter dated January 8, 2019 (Flood_FL1_1988)
622. Ada Forte, form letter dated March 1, 2019 (Forte_FL1_2530)
623. Susan Fox, form letter dated March 1, 2019 (Fox_FL1_2839)
624. Kenneth Fox, form letter dated March 1, 2019 (Fox_FL1_2840)
625. Lisa Foy, form letter dated January 10, 2019 (Foy_FL1_403)
626. Stephen Foy, form letter dated January 10, 2019 (Foy_FL1_404)
627. Elvira Francischelli, form letter dated March 1, 2019 (Francischelli_FL1_2761)
628. Louis Francischelli, form letter dated March 1, 2019 (Francischelli_FL1_2762)
629. R. Friedman, form letter dated January 10, 2019 (Friedman_FL1_388)
630. Mabel M. Galanek, form letter dated January 8, 2019 (Galanek_FL1_1946)
631. Melissa Gallaghur, form letter dated January 10, 2019 (Gallaghur_FL1_451)
632. Gary Gallelli, form letter dated January 10, 2019 (Gallelli_FL1_452)
633. Joseph Gambino, form letter dated January 8, 2019 (Gambino_FL1_1824)
634. Louis Gammauato, form letter dated January 8, 2019 (Gammauato_FL1_1909)
635. Donna Gammauato, form letter dated January 8, 2019 (Gammauato_FL1_1913)
636. Patricia Ganun, form letter dated January 8, 2019 (Ganun_FL1_1896)
637. Robert Ganun, form letter dated January 8, 2019 (Ganun_FL1_1897)
638. Stephanie Garawek, form letter dated March 1, 2019 (Garawek_FL1_2740)
639. Gerohe Garcia, form letter dated March 1, 2019 (Garcia_FL1_2864)
640. Rosa Garcia, form letter dated March 1, 2019 (Garcia_FL1_2867)
641. Anne G. Gargiulo, form letter dated January 8, 2019 (Gargiulo_FL1_1945)
642. Patricia Garmica, form letter dated March 1, 2019 (Garmica_FL1_2793)
643. Gilda Gately, form letter dated March 1, 2019 (Gately_FL1_2836)
644. Matthew Gately, form letter dated March 1, 2019 (Gately_FL1_2841)
645. Francis Gehrling, form letter dated March 1, 2019 (Gehrling_FL1_2448)
646. Frederick Gehrling, form letter dated March 1, 2019 (Gehrling_FL1_2449)
647. Edward W. Geraghty, form letter dated January 8, 2019 (Geraghty_FL1_1990)
648. Noreen Gill, form letter dated January 10, 2019 (Gill_FL1_343)
649. Thomas Gill, form letter dated January 23, 2019 (Gill_FL1_2134)
650. Jennifer Gill, form letter dated January 23, 2019 (Gill_FL1_2135)
651. Kaitlyn E. Gill, form letter dated January 23, 2019 (Gill_FL1_2136)
652. James Gill, form letter dated March 1, 2019 (Gill_FL1_2798)
653. Jennifer Gill, form letter dated March 1, 2019 (Gill_FL1_2799)
654. Kaitlyn Gill, form letter dated March 1, 2019 (Gill_FL1_2800)
655. Gregory Girardi, form letter dated January 10, 2019 (Girardi_FL1_467)
656. Christina Girardi, form letter dated January 10, 2019 (Girardi_FL1_468)
657. Thomas Girardi, form letter dated January 10, 2019 (Girardi_FL1_469)
658. Gregory Girardi, form letter dated January 10, 2019 (Girardi_FL1_478)
659. Angela Girardi, form letter dated January 10, 2019 (Girardi_FL1_480)
660. Elizabeth M. Glaser, form letter dated January 10, 2019 (Glaser_FL1_323)
661. Sean Glennon, form letter dated January 8, 2019 (Glennon_FL1_1902)
662. Maureen Glennon-Heb, form letter dated January 8, 2019 (Glennon-Heb_FL1_1964)
663. Lorraine Goodis, form letter dated January 10, 2019 (Goodis_FL1_407)
664. P. Gormley, form letter dated January 8, 2019 (Gormley_FL1_2016)
665. Joseph Gormley, form letter dated January 23, 2019 (Gormley_FL1_2130)
666. Kevin Gormley, form letter dated January 23, 2019 (Gormley_FL1_2131)
667. Joseph Gormley, form letter dated March 1, 2019 (Gormley_FL1_2794)
668. Kevin Gormley, form letter dated March 1, 2019 (Gormley_FL1_2795)
669. Walter E. Gosden, form letter dated January 10, 2019 (Gosden_FL1_491)
670. Judith Greene, form letter dated January 8, 2019 (Greene_FL1_1907)
671. Carol Gregorio, form letter dated March 1, 2019 (Gregorio_FL1_2778)
672. Judith Grillo, form letter dated March 1, 2019 (Grillo_FL1_2881)
673. Michael Grillo, form letter dated March 1, 2019 (Grillo_FL1_2883)
674. Anne Groshans, form letter dated January 10, 2019 (Groshans_FL1_402)
675. Nancy Gross, form letter dated January 8, 2019 (Gross_FL1_1900)
676. A. Guadagno, form letter dated January 10, 2019 (Guadagno_FL1_397)
677. Catherine Guadagno, form letter dated January 10, 2019 (Guadagno_FL1_401)
678. Francis Gunther, form letter dated January 8, 2019 (Gunther_FL1_2041)
679. Jeanne Haid, form letter dated January 8, 2019 (Haid_FL1_1894)
680. James Handlin, form letter dated January 10, 2019 (Handlin_FL1_490)
681. James Handlin, form letter dated January 8, 2019 (Handlin_FL1_2013)
682. Mary Harkins, form letter dated January 8, 2019 (Harkins_FL1_2030)
683. Crystal Harris, form letter dated March 1, 2019 (Harris_FL1_2742)
684. Deborah Hastings, form letter dated January 8, 2019 (Hastings_FL1_2051)
685. Josephine Haugh, form letter dated March 1, 2019 (Haugh_FL1_2861)
686. John J. Haugh, form letter dated March 1, 2019 (Haugh_FL1_2862)
687. Douglas J. Hayden, form letter dated January 8, 2019 (Hayden_FL1_1879)
688. Una Hayden, form letter dated January 8, 2019 (Hayden_FL1_1898)
Chapter 22: Response to Public Comments

689. John Healy, form letter dated January 10, 2019 (Healy_FL1_396)
690. William A. Hecker, form letter dated March 1, 2019 (Hecker_FL1_2768)
691. Peggyanne Hecker, form letter dated March 1, 2019 (Hecker_FL1_2769)
692. Evelyn M. Hegler, form letter dated March 1, 2019 (Hegler_FL1_2430)
693. Lauren Henderson, form letter dated January 23, 2019 (Henderson_FL1_2132)
694. Dan Henderson, form letter dated January 23, 2019 (Henderson_FL1_2133)
695. Lauren Henderson, form letter dated March 1, 2019 (Henderson_FL1_2796)
696. Dan Henderson, form letter dated March 1, 2019 (Henderson_FL1_2797)
697. Aileen Hennelly, form letter dated January 10, 2019 (Hennelly_FL1_408)
698. Lynn Henry, form letter dated January 8, 2019 (Henry_FL1_1844)
699. Pat Hill, form letter dated March 1, 2019 (Hill_FL1_2492)
700. Katherine Hoey, form letter dated March 1, 2019 (Hoey_FL1_2581)
701. Robert P. Hoey, form letter dated March 1, 2019 (Hoey_FL1_2822)
702. Thomas Holz, form letter dated January 8, 2019 (Holz_FL1_1970)
703. Kathleen Hopkins, form letter dated January 10, 2019 (Hopkins_FL1_441)
704. Suzanne Huber, form letter dated January 8, 2019 (Huber_FL1_2046)
705. Karen Hughes, form letter dated January 10, 2019 (Hughes_FL1_369)
706. Shanthy Hughes, form letter dated January 10, 2019 (Hughes_FL1_391)
707. Daniel Hughes, form letter dated January 8, 2019 (Hughes_FL1_1865)
708. John Hughes, form letter dated January 8, 2019 (Hughes_FL1_1956)
709. Heather Hughes, form letter dated January 8, 2019 (Hughes_FL1_2000)
710. John M. Hughes, form letter dated January 8, 2019 (Hughes_FL1_2011)
711. Winifred B. Hughes, form letter dated January 8, 2019 (Hughes_FL1_2012)
712. Claire Hughes, form letter dated January 8, 2019 (Hughes_FL1_2027)
713. Michael R. Jakob, form letter dated January 8, 2019 (Jakob_FL1_2035)
714. Patricia Clements Jaquay, form letter dated March 1, 2019 (Jaquay_FL1_2828)
715. Mary R. Kane, form letter dated January 10, 2019 (Kane_FL1_325)
716. James Kane, form letter dated January 8, 2019 (Kane_FL1_1862)
717. William Keeleher, form letter dated January 10, 2019 (Keeleher_FL1_434)
718. John F. Keenan, form letter dated January 10, 2019 (Keenan_FL1_425)
719. Kathleen L. Keenan, form letter dated January 10, 2019 (Keenan_FL1_426)
720. Ann Kellner, form letter dated January 8, 2019 (Kellner_FL1_1904)
721. Frances Kellner, form letter dated January 8, 2019 (Kellner_FL1_2010)
722. Margaret A. Kelly, form letter dated January 8, 2019 (Kelly_FL1_1839)
723. James Kelly, form letter dated January 8, 2019 (Kelly_FL1_2026)
724. Jessica Kelly-Brown, form letter dated January 8, 2019 (Kelly-Brown_FL1_1852)
725. Patrick M. Kenneally, form letter dated January 8, 2019 (Kenneally_FL1_1873)
726. Luke Kenneally, form letter dated March 1, 2019 (Kenneally_FL1_2456)
727. Ellen Kenneally, form letter dated March 1, 2019 (Kenneally_FL1_2472)
728. Kevin R. Kennedy, form letter dated January 8, 2019 (Kennedy_FL1_1938)
729. Amy Kerrigan, form letter dated January 10, 2019 (Kerrigan_FL1_460)
731. Admen Khan, form letter dated January 10, 2019 (Khan_FL1_362)
732. Farooq Khawaja, form letter dated January 8, 2019 (Khawaja_FL1_1889)
733. Marylou King, form letter dated January 8, 2019 (King_FL1_1968)
734. P. Kirby, form letter dated January 8, 2019 (Kirby_FL1_1881)
735. Catherine Kirchhofer, form letter dated March 1, 2019 (Kirchhofer_FL1_2859)
736. Kevin Kiss, form letter dated January 8, 2019 (Kiss_FL1_2037)
Alexander M. Koester, form letter dated March 1, 2019 (Koester_FL1_2525)
Andrew Kosinski, form letter dated March 1, 2019 (Kosinski_FL1_2868)
Christina Kosinski, form letter dated March 1, 2019 (Kosinski_FL1_2869)
Anthony Kruzynski, form letter dated January 8, 2019 (Kruzynski_FL1_1925)
Emily Kruzynski, form letter dated January 8, 2019 (Kruzynski_FL1_1953)
Thomas Kubler, form letter dated January 4, 2019 (Kubler_FL1_007)
Thomas Kubler, form letter dated March 1, 2019 (Kubler_FL1_2853)
Dana Laffey, form letter dated January 8, 2019 (Laffey_FL1_2005)
Kathleen Lally, form letter dated January 8, 2019 (Lally_FL1_1886)
Robert LaMarche, form letter dated January 8, 2019 (LaMarche_FL1_2044)
Darlene Lanza, form letter dated January 8, 2019 (Lanza_FL1_1928)
Frances Lanzetta, form letter dated January 10, 2019 (Lanzetta_FL1_338)
Frances Lanzetta, form letter dated January 8, 2019 (Lanzetta_FL1_1927)
Lisa Lanzetta, form letter dated January 8, 2019 (Lanzetta_FL1_1931)
Elizabeth Lauria, form letter dated January 10, 2019 (Lauria_FL1_399)
Maureen Laut, form letter dated March 1, 2019 (Laut_FL1_2889)
Lauren Lavoie, form letter dated January 8, 2019 (Lavoie_FL1_1899)
Patricia Lennon, form letter dated March 1, 2019 (Lennon_FL1_2821)
Meredith Liberatore, form letter dated January 10, 2019 (Liberatore_FL1_324)
Elaine Licari, form letter dated January 8, 2019 (Licari_FL1_1891)
Carol J. Lipsky, form letter dated January 10, 2019 (Lipsky_FL1_331)
Maria Locasio, form letter dated January 8, 2019 (Locasio_FL1_1947)
Pia Loftus, form letter dated March 1, 2019 (Loftus_FL1_2877)
Joseph Loftus, form letter dated March 1, 2019 (Loftus_FL1_2878)
Regina Lohen, form letter dated January 8, 2019 (Lohen_FL1_1923)
Krista Longobardi, form letter dated January 10, 2019 (Longobardi_FL1_346)
Denise Longobardi, form letter dated January 8, 2019 (Longobardi_FL1_1979)
Michael Longobardi, form letter dated January 8, 2019 (Longobardi_FL1_1999)
Mike Lovari, form letter dated January 10, 2019 (Lovari_FL1_329)
Rose Lozano, form letter dated January 10, 2019 (Lozano_FL1_436)
Lorraine Lubicich, form letter dated January 10, 2019 (Lubicich_FL1_474)
Peggy Lyons, form letter dated January 8, 2019 (Lyons_FL1_1880)
Maureen MacDonald, form letter dated January 8, 2019 (MacDonald_FL1_1906)
Teresa MacDonald, form letter dated January 8, 2019 (MacDonald_FL1_1920)
Margaretq MacDonald, form letter dated January 8, 2019 (MacDonald_FL1_1921)
James E. MacDonald, form letter dated January 8, 2019 (MacDonald_FL1_1962)
T. Macko, form letter dated January 10, 2019 (Macko_FL1_330)
Victoria Maclean, form letter dated January 10, 2019 (Maclean_FL1_409)
Valerie Magee, form letter dated January 10, 2019 (Magee_FL1_455)
Jim Malone, form letter dated January 8, 2019 (Malone_FL1_1958)
Diane Malone, form letter dated January 8, 2019 (Malone_FL1_1959)
Jill Manning, form letter dated January 10, 2019 (Manning_FL1_359)
Laurel Manning, form letter dated January 10, 2019 (Manning_FL1_398)
Maggie Mansfield, form letter dated January 8, 2019 (Mansfield_FL1_064)
Thomas Mansfield, form letter dated January 8, 2019 (Mansfield_FL1_065)
Maureen Mansfield, form letter dated January 8, 2019 (Mansfield_FL1_066)
<table>
<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Date of Letter</th>
<th>Form Letter Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>785</td>
<td>Maggie Mansfield</td>
<td>January 8, 2019</td>
<td>Mansfield_FL1_2056</td>
</tr>
<tr>
<td>786</td>
<td>Thomas Mansfield</td>
<td>January 8, 2019</td>
<td>Mansfield_FL1_2057</td>
</tr>
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<td>787</td>
<td>Maureen R. O'Connor Mansfield</td>
<td>January 8, 2019</td>
<td>Mansfield_FL1_2058</td>
</tr>
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<td>788</td>
<td>Lenore Marchiano</td>
<td>January 8, 2019</td>
<td>Marchiano_FL1_1905</td>
</tr>
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<td>Janet Marino</td>
<td>March 1, 2019</td>
<td>Marino_FL1_2438</td>
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<td>790</td>
<td>Brigid Marmorowski</td>
<td>January 8, 2019</td>
<td>Marmorowski_FL1_1840</td>
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<tr>
<td>791</td>
<td>Patricia Martinez</td>
<td>January 8, 2019</td>
<td>Martinez_FL1_1991</td>
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<tr>
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<td>Edward Martinez</td>
<td>March 1, 2019</td>
<td>Martinez_FL1_2779</td>
</tr>
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<td>793</td>
<td>Sally Martucci</td>
<td>January 10, 2019</td>
<td>Martucci_FL1_387</td>
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<td>Robert Martucci</td>
<td>January 10, 2019</td>
<td>Martucci_FL1_389</td>
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<td>Mary Jane Mastrella</td>
<td>January 8, 2019</td>
<td>Mastrella_FL1_1863</td>
</tr>
<tr>
<td>796</td>
<td>Michele Mayo</td>
<td>January 10, 2019</td>
<td>Mayo_FL1_377</td>
</tr>
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<td>797</td>
<td>Melissa Mazzocco</td>
<td>March 1, 2019</td>
<td>Mazzocco_FL1_2752</td>
</tr>
<tr>
<td>798</td>
<td>Frank &amp; Peg McCaffrey</td>
<td>January 8, 2019</td>
<td>McCaffrey_FL1_1825</td>
</tr>
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<td>799</td>
<td>Karen McCarren</td>
<td>January 10, 2019</td>
<td>McCarren_FL1_392</td>
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<td>Heather McClintock</td>
<td>January 8, 2019</td>
<td>McClintock_FL1_1854</td>
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<td>Brian McClintock</td>
<td>January 8, 2019</td>
<td>McClintock_FL1_2002</td>
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<td>802</td>
<td>Patricia McCormack</td>
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<td>McCormack_FL1_342</td>
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<td>803</td>
<td>Finola McCovern</td>
<td>January 10, 2019</td>
<td>McCovern_FL1_466</td>
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<td>Dana McCoy</td>
<td>January 10, 2019</td>
<td>McCoy_FL1_438</td>
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<td>Anne Marie McGeeever</td>
<td>January 8, 2019</td>
<td>McGeever_FL1_2040</td>
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<td>Anne Marie McGeeever</td>
<td>March 1, 2019</td>
<td>McGeever_FL1_2810</td>
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<td>Matthew McGeeever</td>
<td>March 1, 2019</td>
<td>McGeever_FL1_2811</td>
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<td>Roger McGovern</td>
<td>January 8, 2019</td>
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<td>Leah McGovern</td>
<td>January 8, 2019</td>
<td>McGovern_FL1_1832</td>
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<td>Brian McGovern</td>
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<td>McGovern_FL1_1893</td>
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<td>Phyllis McGovern</td>
<td>January 8, 2019</td>
<td>McGovern_FL1_2001</td>
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<td>G. McGowan</td>
<td>January 8, 2019</td>
<td>McGowan_FL1_1857</td>
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<td>813</td>
<td>Marian McGrane</td>
<td>January 10, 2019</td>
<td>McGrane_FL1_351</td>
</tr>
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<td>814</td>
<td>James McGuire</td>
<td>January 8, 2019</td>
<td>McGuire_FL1_1858</td>
</tr>
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<td>Angela McGuire</td>
<td>January 8, 2019</td>
<td>McGuire_FL1_1861</td>
</tr>
<tr>
<td>816</td>
<td>Brian McHale</td>
<td>January 8, 2019</td>
<td>McHale_FL1_1983</td>
</tr>
<tr>
<td>817</td>
<td>Kathleen McInerney</td>
<td>January 8, 2019</td>
<td>McInerney_FL1_2033</td>
</tr>
<tr>
<td>818</td>
<td>James McLaughlin</td>
<td>March 1, 2019</td>
<td>McLaughlin_FL1_2870</td>
</tr>
<tr>
<td>819</td>
<td>Thomas Merle</td>
<td>January 8, 2019</td>
<td>Merle_FL1_1869</td>
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<td>Russel Mesnick</td>
<td>January 8, 2019</td>
<td>Mesnick_FL1_1933</td>
</tr>
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<td>Kurt Meyfohrt</td>
<td>January 8, 2019</td>
<td>Meyfohrt_FL1_1929</td>
</tr>
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<td>Deborah Meyfohrt</td>
<td>January 8, 2019</td>
<td>Meyfohrt_FL1_1930</td>
</tr>
<tr>
<td>823</td>
<td>Kyle Meyfohrt</td>
<td>January 8, 2019</td>
<td>Meyfohrt_FL1_1961</td>
</tr>
<tr>
<td>824</td>
<td>Donald Mezzett</td>
<td>January 8, 2019</td>
<td>Mezzett_FL1_1884</td>
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<tr>
<td>825</td>
<td>Mia Minogue</td>
<td>January 10, 2019</td>
<td>Minogue_FL1_458</td>
</tr>
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<td>826</td>
<td>Deirdre Moore</td>
<td>March 1, 2019</td>
<td>Moore_FL1_2757</td>
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<td>827</td>
<td>Shannon Moroney</td>
<td>January 10, 2019</td>
<td>Moroney_FL1_412</td>
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<td>Thomas Moroney</td>
<td>January 10, 2019</td>
<td>Moroney_FL1_472</td>
</tr>
<tr>
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<td>Kathleen M. Morrongello</td>
<td>January 8, 2019</td>
<td>Morrongello_FL1_1971</td>
</tr>
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<td>830</td>
<td>Asmaa Mounir</td>
<td>January 10, 2019</td>
<td>Mounir_FL1_380</td>
</tr>
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<td>831</td>
<td>Kathleen Mulhall</td>
<td>January 8, 2019</td>
<td>Mulhall_FL1_1936</td>
</tr>
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<td>832.</td>
<td>John Mulhall, form letter dated January 8, 2019 (Mulhall_FL1_1943)</td>
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<td>833.</td>
<td>Neil Mulhall, form letter dated January 8, 2019 (Mulhall_FL1_1976)</td>
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<td>834.</td>
<td>Marc Mullen, form letter dated January 8, 2019 (Mullen_FL1_1987)</td>
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<td>835.</td>
<td>Judy Muller, form letter dated January 10, 2019 (Muller_FL1_444)</td>
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<tr>
<td>836.</td>
<td>Kathy Muller, form letter dated January 8, 2019 (Muller_FL1_1851)</td>
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<td></td>
</tr>
<tr>
<td>837.</td>
<td>Alfred J. Muller, form letter dated January 8, 2019 (Muller_FL1_1874)</td>
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<td></td>
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<tr>
<td>838.</td>
<td>Elisabeth Muller, form letter dated January 8, 2019 (Muller_FL1_1940)</td>
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<tr>
<td>839.</td>
<td>Sheila Mulligan, form letter dated January 10, 2019 (Mulligan_FL1_333)</td>
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<tr>
<td>840.</td>
<td>Christine Mulryan, form letter dated January 4, 2019 (Mulryan_FL1_016)</td>
<td></td>
<td></td>
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<tr>
<td>841.</td>
<td>Christopher Munoz, form letter dated March 1, 2019 (Munoz_FL1_2837)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>842.</td>
<td>Paul Muraski, form letter dated March 1, 2019 (Muraski_FL1_2422)</td>
<td></td>
<td></td>
</tr>
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<td>843.</td>
<td>Camille E. Murphy, form letter dated January 10, 2019 (Murphy_FL1_340)</td>
<td></td>
<td></td>
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<tr>
<td>844.</td>
<td>Michael Murphy, form letter dated January 10, 2019 (Murphy_FL1_449)</td>
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<td>Liam Murphy, form letter dated January 8, 2019 (Murphy_FL1_1973)</td>
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<td>Nancy Muscat, form letter dated January 10, 2019 (Muscat_FL1_382)</td>
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<td>Christina Nardella, form letter dated January 10, 2019 (Nardella_FL1_439)</td>
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<td>Stephanie Naronis, form letter dated March 1, 2019 (Naronis_FL1_2772)</td>
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<td>Paul Naronis, form letter dated March 1, 2019 (Naronis_FL1_2773)</td>
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<td>Brian Naughton, form letter dated January 8, 2019 (Naughton_FL1_1941)</td>
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<td>Dina Nelson, form letter dated January 8, 2019 (Nelson_FL1_2024)</td>
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<td>Vickey Niles, form letter dated January 10, 2019 (Niles_FL1_447)</td>
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<td>Anthony J. Norcia, form letter dated March 1, 2019 (Norcia_FL1_2829)</td>
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<td>MK O'Brien, form letter dated January 10, 2019 (O'Brien_FL1_364)</td>
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<td>Terry O'Brien, form letter dated January 8, 2019 (O'Brien_FL1_1892)</td>
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<td>Anne O'Brien, form letter dated March 1, 2019 (O'Brien_FL1_2749)</td>
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<td>Amy G. O'Connor, form letter dated January 10, 2019 (O'Connor_FL1_384)</td>
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<td>Diane O'Donnell, form letter dated January 10, 2019 (O'Donnell_FL1_365)</td>
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<td>Mary O'Donoghue, form letter dated January 10, 2019 (O'Donoghue_FL1_484)</td>
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<td>Gerard O'Donoghue, form letter dated March 1, 2019 (O'Donoghue_FL1_2754)</td>
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<td>Maria O'Grady, form letter dated January 8, 2019 (O'Grady_FL1_2048)</td>
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<td>Margaret O'Keefe, form letter dated January 10, 2019 (O'Keefe_FL1_371)</td>
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<td>Melissa O'Leary, form letter dated January 10, 2019 (O'Leary_FL1_381)</td>
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<td>Mary Jane O'Malley, form letter dated March 1, 2019 (O'Malley_FL1_2805)</td>
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<td>Dian Mills O'Reilly</td>
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<td>Christine Orkwis</td>
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<td>Maria E. Ortega</td>
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<td>Tara Palacios</td>
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<td>Emilia Palamara</td>
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<td>John Paley</td>
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<td>Laura Pape</td>
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<td>Jennifer Pappas</td>
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<td>Donna Parlella</td>
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<td>John Peiser</td>
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<td>Rachael Penteck</td>
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<td>Luise E. Ranegan</td>
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<td>Fran Rasquin</td>
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<td>C. Rasquin</td>
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<td>Janet Reid</td>
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<td>Liz Reisch</td>
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Mark Reisig, form letter dated January 8, 2019 (Reisig_FL1_1887)
Christine Reisig, form letter dated January 8, 2019 (Reisig_FL1_1978)
Amy Richardson, form letter dated January 10, 2019 (Richardson_FL1_427)
Tamara Richardson-Mandel, form letter dated March 1, 2019 (Richardson-Mandel_FL1_2758)
Lynn Riofrio, form letter dated January 10, 2019 (Riofrio_FL1_368)
Daniel Riordan, form letter dated March 1, 2019 (Riordan_FL1_2464)
Tracey Riordan, form letter dated March 1, 2019 (Riordan_FL1_2468)
Mary Rispoli, form letter dated March 1, 2019 (Rispoli_FL1_2856)
Joseph Rispoli, form letter dated March 1, 2019 (Rispoli_FL1_2857)
Milegro Rivera, form letter dated March 1, 2019 (Rivera_FL1_2858)
Sharon Rivilli, form letter dated January 10, 2019 (Rivilli_FL1_416)
Frank Rivilli, form letter dated January 10, 2019 (Rivilli_FL1_418)
Jane Rizzo, form letter dated January 10, 2019 (Rizzo_FL1_355)
Donna Roller, form letter dated January 8, 2019 (Roller_FL1_2052)
Michaela Roller, form letter dated January 8, 2019 (Roller_FL1_2053)
Dennis J. Roller, form letter dated January 8, 2019 (Roller_FL1_2054)
Janet Romano Murray, form letter dated January 8, 2019 (Romano Murray_FL1_2042)
Patricia Ronan, form letter dated January 10, 2019 (Ronan_FL1_428)
James Rooney, form letter dated March 1, 2019 (Rooney_FL1_2781)
Azbela Rooney, form letter dated March 1, 2019 (Rooney_FL1_2782)
Paula Rowe, form letter dated January 10, 2019 (Rowe_FL1_481)
Jonathan Rueda, form letter dated March 1, 2019 (Rueda_FL1_2884)
M. Ruscica, form letter dated January 8, 2019 (Ruscica_FL1_1871)
Kathleen M. Ryan, form letter dated January 10, 2019 (Ryan_FL1_437)
Michelle Ryan, form letter dated January 8, 2019 (Ryan_FL1_2019)
Sundas Salman, form letter dated January 10, 2019 (Salman_FL1_366)
Christopher Salogub, form letter dated January 8, 2019 (Salogub_FL1_2009)
Allen Sankovitch, form letter dated January 10, 2019 (Sankovitch_FL1_361)
Anne Marie Santangelo, form letter dated January 10, 2019 (Santangelo_FL1_356)
Vito Santoruvo, form letter dated January 10, 2019 (Santoruvo_FL1_429)
Daisy Santoruvo, form letter dated January 10, 2019 (Santoruvo_FL1_430)
Elizabeth Santos, form letter dated January 10, 2019 (Santos_FL1_393)
Eugena & Robert Sarro, form letter dated January 8, 2019 (Sarro_FL1_1994)
Linda Sartini, form letter dated March 1, 2019 (Sartini_FL1_2743)
Robert M. Savage, form letter dated January 8, 2019 (Savage_FL1_1859)
Michael Saville, form letter dated January 10, 2019 (Saville_FL1_486)
Thomas Saville, form letter dated January 10, 2019 (Saville_FL1_488)
Deborah Sawicho, form letter dated January 8, 2019 (Sawicho_FL1_1934)
Michelle Scheider, form letter dated March 1, 2019 (Scheider_FL1_2807)
Margaret Schlecht, form letter dated January 10, 2019 (Schlecht_FL1_476)
Kenneth Schlecht, form letter dated January 10, 2019 (Schlecht_FL1_477)
William Schneider, form letter dated March 1, 2019 (Schneider_FL1_2876)
William Schneider, form letter dated March 1, 2019 (Schneider_FL1_2893)
Evelyn Schultz, form letter dated January 10, 2019 (Schultz_FL1_341)
Carol Scime-Raiford, form letter dated January 8, 2019 (Scime-Raiford_FL1_1910)
Amy Sebber, form letter dated January 10, 2019 (Sebber_FL1_332)
Joe Serra, form letter dated January 8, 2019 (Serra_FL1_1855)
Chapter 22: Response to Public Comments

975. Gina Settele, form letter dated January 8, 2019 (Settele_FL1_1868)
976. Steven Settele, form letter dated January 8, 2019 (Settele_FL1_1972)
977. Amy Sexton, form letter dated January 10, 2019 (Sexton_FL1_415)
978. John Sexton, form letter dated January 8, 2019 (Sexton_FL1_1942)
979. Matthew Sexton, form letter dated January 8, 2019 (Sexton_FL1_1993)
980. Kathleen P. Shaw, form letter dated January 8, 2019 (Shaw_FL1_1932)
981. Greg Shellon, form letter dated March 1, 2019 (Shellon_FL1_2831)
982. Peter Shevin, form letter dated March 1, 2019 (Shevin_FL1_2833)
983. Nora Shevin, form letter dated March 1, 2019 (Shevin_FL1_2849)
984. Terry Sica, form letter dated January 10, 2019 (Sica_FL1_390)
985. Thomas Sigismonti, form letter dated January 8, 2019 (Sigismonti_FL1_1853)
986. Lisa Sindoni, form letter dated January 18, 2019 (Sindoni_FL1_2061)
987. Timothy Slavin, form letter dated March 1, 2019 (Slavin_FL1_2819)
988. Stacy Slavin, form letter dated March 1, 2019 (Slavin_FL1_2820)
989. Alex Slavin, form letter dated March 1, 2019 (Slavin_FL1_2873)
990. Siobhan Smith, form letter dated January 10, 2019 (Smith_FL1_327)
991. Thomas G. Smith, form letter dated January 8, 2019 (Smith_FL1_1895)
992. Karen J. Sommer, form letter dated March 1, 2019 (Sommer_FL1_2440)
993. Anne Soviero, form letter dated March 1, 2019 (Soviero_FL1_2825)
994. John Speck, form letter dated January 10, 2019 (Speck_FL1_405)
995. Maggie Speck, form letter dated January 10, 2019 (Speck_FL1_406)
996. Cheryl Spigonardo, form letter dated January 8, 2019 (Spigonardo_FL1_1888)
997. Vanessa Spinner, form letter dated January 10, 2019 (Spinner_FL1_352)
998. Stephen Sprague, form letter dated January 8, 2019 (Sprague_FL1_1833)
999. Marilyn Sprague, form letter dated January 8, 2019 (Sprague_FL1_1834)
1002. Margaret Sullivan, form letter dated January 8, 2019 (Sullivan_FL1_2022)
1003. Erica Summer, form letter dated February 11, 2019 (Summer_FL1_2224)
1004. Carolyn Susino, form letter dated March 1, 2019 (Susino_FL1_2801)
1005. Tara Sweeney, form letter dated January 10, 2019 (Sweeney_FL1_383)
1006. Kathy Sweeney, form letter dated January 10, 2019 (Sweeney_FL1_385)
1007. Helena Swierkosz, form letter dated March 1, 2019 (Swierkosz_FL1_2513)
1008. Melanie Szabo, form letter dated February 8, 2019 (Szabo_FL1_2221)
1009. Jason Szabo, form letter dated February 11, 2019 (Szabo_FL1_2225)
1010. Kathleen Szala, form letter dated March 1, 2019 (Szala_FL1_2785)
1011. Joseph Szala, form letter dated March 1, 2019 (Szala_FL1_2786)
1012. Paul Szymanski, form letter dated January 8, 2019 (Szymanski_FL1_067)
1013. Paul Szymanski, form letter dated January 8, 2019 (Szymanski_FL1_2059)
1014. Theresa Tam, form letter dated March 1, 2019 (Tam_FL1_2808)
1015. Douglas Tam, form letter dated March 1, 2019 (Tam_FL1_2809)
1016. Ingrid S. Taveras, form letter dated January 8, 2019 (Taveras_FL1_1967)
1017. Shannon Tengi, form letter dated March 1, 2019 (Tengi_FL1_2823)
1018. Christopher Tengi, form letter dated March 1, 2019 (Tengi_FL1_2824)
1019. Christine Thorpe, form letter dated January 8, 2019 (Thorpe_FL1_1916)
1020. Laura Tommony, form letter dated January 10, 2019 (Tommony_FL1_435)
1021. George N. Torres, form letter dated January 10, 2019 (Torres_FL1_328)
1022. Mary Towey, form letter dated January 8, 2019 (Towey_FL1_1837)
1023. Michael Towey, form letter dated January 8, 2019 (Towey_FL1_1866)
1024. Kate Trainor, form letter dated January 8, 2019 (Trainor_FL1_1867)
1025. John T. Trainor, form letter dated January 8, 2019 (Trainor_FL1_1903)
1026. John Trainor, form letter dated March 1, 2019 (Trainor_FL1_2854)
1027. Ann Trainor, form letter dated March 1, 2019 (Trainor_FL1_2855)
1028. Sal & Marina Trentacoste, form letter dated January 8, 2019 (Trentacoste_FL1_1856)
1029. Laura J Trentacoste, form letter dated January 8, 2019 (Trentacoste_FL1_1954)
1030. Laura J Trentacoste, form letter dated January 8, 2019 (Trentacoste_FL1_2045)
1031. Amanda Tripmacher, form letter dated March 1, 2019 (Tripmacher_FL1_2755)
1032. Tim Turmi, form letter dated March 1, 2019 (Turmi_FL1_2406)
1033. Steven Turner, form letter dated March 1, 2019 (Turner_FL1_2759)
1034. Paul Tutrone, form letter dated March 1, 2019 (Tutrone_FL1_2775)
1035. Catherine Tutrone, form letter dated March 1, 2019 (Tutrone_FL1_2776)
1037. Roy Tyson, form letter dated January 8, 2019 (Tyson_FL1_1924)
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1041. Unknown, form letter dated March 1, 2019 (Unknown_FL1_2509)
1042. Unsigned, form letter dated March 1, 2019 (Unsigned_FL1_2890)
1043. Unsigned, form letter dated March 1, 2019 (Unsigned_FL1_2891)
1044. Unsigned, form letter dated March 1, 2019 (Unsigned_FL1_2892)
1045. Michael Valaner, form letter dated January 10, 2019 (Valaner_FL1_336)
1046. Joe Vale, form letter dated January 8, 2019 (Vale_FL1_1901)
1047. Anne Marie Vargas, form letter dated January 10, 2019 (Vargas_FL1_375)
1048. Trisha Vecchione, form letter dated February 25, 2019 (Vecchione_FL1_2326)
1049. Paul Veggiano, form letter dated March 1, 2019 (Veggiano_FL1_2791)
1051. Christina Vincent, form letter dated January 10, 2019 (Vincent_FL1_363)
1052. Linda Vota, form letter dated January 10, 2019 (Vota_FL1_326)
1055. Lester F. Wahrenburg, form letter dated January 8, 2019 (Wahrenburg_FL1_1969)
1056. Joan Walsh, form letter dated March 1, 2019 (Walsh_FL1_2494)
1057. Caroline Ward, form letter dated January 8, 2019 (Ward_FL1_1917)
1058. Thomas Ward, form letter dated January 8, 2019 (Ward_FL1_1918)
1059. Tracy Ward, form letter dated January 8, 2019 (Ward_FL1_1919)
1060. Margaret Weichert, form letter dated January 8, 2019 (Weichert_FL1_1827)
1061. Janet Wille, form letter dated January 10, 2019 (Wille_FL1_348)
1062. Steve Wintors, form letter dated January 8, 2019 (Wintors_FL1_1872)
1063. George Wrage, form letter dated January 8, 2019 (Wrage_FL1_2008)
1064. Elizabeth Wysocki, form letter dated January 10, 2019 (Wysocki_FL1_482)
1065. Richard Wysocki, form letter dated January 10, 2019 (Wysocki_FL1_483)
1066. Akiko Yamamoto, form letter dated January 10, 2019 (Yamamoto_FL1_433)
1067. Herbert Zahner, form letter dated January 8, 2019 (Zahner_FL1_1828)
1068. Kerry E. Zalepa, form letter dated March 1, 2019 (Zalepa_FL1_2830)
1069. Jennifer Zampini, form letter dated March 1, 2019 (Zampini_FL1_2880)
1070. Alfonzi Zampini, form letter dated March 1, 2019 (Zampini_FL1_2882)
Chapter 22: Response to Public Comments

1071. Joseph Zoleta, form letter dated March 1, 2019 (Zoleta_FL1_2817)
1072. Jane Zoleta, form letter dated March 1, 2019 (Zoleta_FL1_2818)

FORM LETTER 2

1073. Jasmine Abel, form letter dated January 15, 2019 (Abel_FL2_615)
1074. John Abel, form letter dated January 15, 2019 (Abel_FL2_1189)
1075. Karina Acosta, form letter dated March 1, 2019 (Acosta_FL2_2669)
1076. Melissa Adler, form letter dated March 1, 2019 (Adler_FL2_2704)
1077. Robert Adler, form letter dated March 1, 2019 (Adler_FL2_2709)
1079. Jessica Alfonsi, form letter dated March 1, 2019 (Alfonsi_FL2_2629)
1081. Madelaine Aliano, form letter dated January 15, 2019 (Aliano_FL2_504)
1082. Monica Altmann, form letter dated February 4, 2019 (Altmann_FL2_2218)
1083. Pilar Alvarado, form letter dated March 1, 2019 (Alvarado_FL2_2715)
1084. Patricia Ambrose, form letter dated March 1, 2019 (Ambrose_FL2_2634)
1085. Joseph Ambrose, form letter dated March 1, 2019 (Ambrose_FL2_2636)
1087. Karl Anoushian, form letter dated January 15, 2019 (Anoushian_FL2_1083)
1088. George Armstrong, form letter dated January 15, 2019 (Armstrong_FL2_574)
1089. Linda Armstrong, form letter dated January 15, 2019 (Armstrong_FL2_575)
1090. Salvatore Arrigo, form letter dated January 15, 2019 (Arrigo_FL2_1241)
1092. Eileen Avigliano, form letter dated March 1, 2019 (Avigliano_FL2_2689)
1093. Eric Avigliano, form letter dated March 1, 2019 (Avigliano_FL2_2691)
1094. Gail Baccari, form letter dated January 15, 2019 (Baccari_FL2_655)
1095. Keith Baccari, form letter dated January 15, 2019 (Baccari_FL2_656)
1096. Sandra Bailey, form letter dated January 15, 2019 (Bailey_FL2_601)
1097. Mary Ryan Bambrick, form letter dated January 15, 2019 (Bambrick_FL2_1087)
1098. Joseph Barlin, form letter dated March 1, 2019 (Barlin_FL2_2714)
1099. Victoria Barlin, form letter dated March 1, 2019 (Barlin_FL2_2721)
1100. Jennifer Battaglia, form letter dated January 15, 2019 (Battaglia_FL2_1300)
1101. Vincent Battaglia, form letter dated January 15, 2019 (Battaglia_FL2_1301)
1102. Theresa Battaglia, form letter dated January 15, 2019 (Battaglia_FL2_1302)
1103. Theresa Battaglia, form letter dated March 1, 2019 (Battaglia_FL2_2582)
1104. Vincent Battaglia, form letter dated March 1, 2019 (Battaglia_FL2_2583)
1105. Jennifer Battaglia, form letter dated March 1, 2019 (Battaglia_FL2_2584)
1106. Jaclyn Battylin, form letter dated January 15, 2019 (Battylin_FL2_500)
1107. L Beck, form letter dated January 15, 2019 (Beck_FL2_1101)
1108. Brendan Beebe, form letter dated March 1, 2019 (Beebe_FL2_2730)
1109. Patricia E. Bellerar, form letter dated March 1, 2019 (Bellerar_FL2_2532)
1110. Eileen Bellusci, form letter dated February 4, 2019 (Bellusci_FL2_2219)
1111. Frank Binkley, form letter dated January 15, 2019 (Binkley_FL2_1090)
1112. Vicki Binkley, form letter dated January 15, 2019 (Binkley_FL2_1097)
1113. Stephen Boettcher, form letter dated March 1, 2019 (Boettcher_FL2_2681)
1114. Dana Bonomo, form letter dated January 15, 2019 (Bonomo_FL2_1176)
1115. Jane M. Bonvicin, form letter dated January 15, 2019 (Bonvicin_FL2_571)
1116. Robert Bonvicin, form letter dated January 15, 2019 (Bonvicin_FL2_572)
1117. Laura Botka, form letter dated March 1, 2019 (Botka_FL2_2641)
1118. Geraldine Brand, form letter dated January 15, 2019 (Brand_FL2_525)
1119. George T. Braun, form letter dated March 1, 2019 (Braun_FL2_2476)
1120. Teresa Braun, form letter dated March 1, 2019 (Braun_FL2_2478)
1121. John Brehony, form letter dated March 1, 2019 (Brehony_FL2_2616)
1122. Cristina Brennan, form letter dated January 15, 2019 (Brennan_FL2_1273)
1123. Chester A. Brown, form letter dated January 15, 2019 (Brown_FL2_1188)
1124. Michael Brown, form letter dated January 15, 2019 (Brown_FL2_1294)
1125. Carolyn J. Browne, form letter dated January 15, 2019 (Browne_FL2_573)
1126. Werner Bruning, form letter dated March 1, 2019 (Bruning_FL2_2706)
1127. Susan Bruning, form letter dated March 1, 2019 (Bruning_FL2_2707)
1128. Nancy Buechler, form letter dated January 9, 2019 (Buechler_FL2_026)
1129. John C. Buechler, form letter dated January 9, 2019 (Buechler_FL2_027)
1130. Genevieve Burke, form letter dated March 1, 2019 (Burke_FL2_2614)
1131. Denis Burke, form letter dated March 1, 2019 (Burke_FL2_2693)
1132. Ann-Marie Burke, form letter dated March 1, 2019 (Burke_FL2_2694)
1133. Carolyn Burke, form letter dated March 1, 2019 (Burke_FL2_2695)
1134. Thomas Byrnes, form letter dated January 15, 2019 (Byrnes_FL2_1194)
1135. Kevin Caer, form letter dated March 1, 2019 (Caer_FL2_2638)
1136. Patrick J. Caldon, form letter dated January 15, 2019 (Caldon_FL2_665)
1137. Lynn Caleri, form letter dated January 15, 2019 (Caleri_FL2_1141)
1138. Catherine Callan, form letter dated January 15, 2019 (Callan_FL2_496)
1139. Charles Callan, form letter dated January 15, 2019 (Callan_FL2_1258)
1140. Raul Calvo, form letter dated March 1, 2019 (Calvo_FL2_2646)
1141. Rosalie Cancellarich, form letter dated January 15, 2019 (Cancellarich_FL2_604)
1142. Steve Cancellarich, form letter dated January 15, 2019 (Cancellarich_FL2_605)
1143. Angela Cannella, form letter dated March 1, 2019 (Cannella_FL2_2653)
1144. Victoria Caponigro, form letter dated January 15, 2019 (Caponigro_FL2_643)
1145. Kristin Caputo, form letter dated January 15, 2019 (Caputo_FL2_1082)
1146. Elizabeth Cardlo, form letter dated March 1, 2019 (Cardlo_FL2_2585)
1147. Joan Cardone, form letter dated March 1, 2019 (Cardone_FL2_2632)
1148. Patricia Carmody, form letter dated March 1, 2019 (Carmody_FL2_2654)
1149. Elizabeth Carollo, form letter dated January 15, 2019 (Carollo_FL2_1315)
1150. Athene Carr, form letter dated March 1, 2019 (Carr_FL2_2644)
1151. Bradley Carrell, form letter dated January 31, 2019 (Carrell_FL2_2212)
1152. Erika L Carrell, form letter dated January 31, 2019 (Carrell_FL2_2213)
1153. Eileen Carrig, form letter dated January 15, 2019 (Carrig_FL2_1209)
1154. Ann Marie Cartwright, form letter dated January 8, 2019 (Cartwright_FL2_072)
1155. Ann Marie Cartwright, form letter dated January 8, 2019 (Cartwright_FL2_075)
1157. Mary Cassidy, form letter dated March 1, 2019 (Cassidy_FL2_2499)
1159. John Charny, form letter dated January 15, 2019 (Charny_FL2_1261)
1160. Nicole Chattertan, form letter dated January 15, 2019 (Chattertan_FL2_521)
1161. Edward Chatterton, form letter dated January 15, 2019 (Chatterton_FL2_1270)
1162. Steven Cheng, form letter dated January 15, 2019 (Cheng_FL2_1140)
1163. Arlene Chianese, form letter dated March 1, 2019 (Chianese_FL2_2526)
1164. Edward Chiodo, form letter dated January 15, 2019 (Chiodo_FL2_1136)
1165. Kathleen M. Clark, form letter dated March 1, 2019 (Clark_FL2_2481)
1166. Joseph Clements, form letter dated March 1, 2019 (Clements FL2_2670)
1167. Patricia Clements Jaquay, form letter dated March 1, 2019 (Clements Jaquay_FL2_2671)
1168. Kathleen Coffey, form letter dated January 10, 2019 (Coffey_FL2_079)
1169. Kathleen Coffey, form letter dated January 15, 2019 (Coffey_FL2_663)
1171. Patricia Comerford, form letter dated March 1, 2019 (Comerford_FL2_2731)
1172. Richard J. Comiskey, form letter dated January 15, 2019 (Comiskey_FL2_1175)
1173. Winifred Connolly, form letter dated March 1, 2019 (Connolly_FL2_2519)
1174. Denise C. Conroy, form letter dated March 1, 2019 (Conroy_FL2_2431)
1175. Christine Conway, form letter dated January 15, 2019 (Conway_FL2_523)
1176. Terence Coppingir, form letter dated January 15, 2019 (Coppingir_FL2_1169)
1178. Ann V. Corbett, form letter dated January 15, 2019 (Corbett_FL2_1240)
1179. Keryann Corbett Padro, form letter dated March 1, 2019 (Corbett Padro_FL2_2619)
1180. Ciaran P. Cormican, form letter dated January 15, 2019 (Cormican_FL2_569)
1181. Kerry Cormican, form letter dated January 15, 2019 (Cormican_FL2_576)
1182. Matt Corrigan, form letter dated January 15, 2019 (Corrigan_FL2_584)
1183. Amy Corrigan, form letter dated January 15, 2019 (Corrigan_FL2_1105)
1184. John R. Cortapasso, form letter dated January 15, 2019 (Cortapasso_FL2_1186)
1185. John T. Crawford, form letter dated March 1, 2019 (Crawford_FL2_2457)
1186. Kevin Creene, form letter dated January 15, 2019 (Creene_FL2_1278)
1187. Sarah Crenshaw, form letter dated January 15, 2019 (Crenshaw_FL2_621)
1188. Tomas Crurba, form letter dated January 15, 2019 (Crurba_FL2_625)
1189. Theresa Cuccetello, form letter dated March 1, 2019 (Cuccetello_FL2_2611)
1190. Laura Cullinan, form letter dated January 15, 2019 (Cullinan_FL2_1310)
1191. Raymond Cullinan, form letter dated January 15, 2019 (Cullinan_FL2_1311)
1192. Laura Cullinan, form letter dated March 1, 2019 (Cullinan_FL2_2596)
1193. Raymond Cullinan, form letter dated March 1, 2019 (Cullinan_FL2_2597)
1194. Deirdre Cunningham, form letter dated January 15, 2019 (Cunningham_FL2_508)
1195. Neil Cunningham, form letter dated January 15, 2019 (Cunningham_FL2_509)
1196. Barbara Cunningham, form letter dated January 15, 2019 (Cunningham_FL2_1229)
1197. Susan D'Amico, form letter dated January 15, 2019 (D'Amico_FL2_1206)
1198. Frank D'Amico, form letter dated January 15, 2019 (D'Amico_FL2_1207)
1199. Nancy E. Daileader, form letter dated January 15, 2019 (Daileader_FL2_1256)
1200. Cynthia Damato, form letter dated January 15, 2019 (Damato_FL2_597)
1201. Abdelilah Daouaou, form letter dated January 15, 2019 (Daouaou_FL2_1154)
1202. Alma Daouaou, form letter dated January 15, 2019 (Daouaou_FL2_1192)
1203. Eileen Davidson, form letter dated March 1, 2019 (Davidson_FL2_2648)
1204. Patricia Dean, form letter dated January 15, 2019 (Dean_FL2_1236)
1205. Diane Deleany, form letter dated March 1, 2019 (Deleany_FL2_2729)
1206. Lee Delia, form letter dated January 15, 2019 (Delia_FL2_596)
1207. Denise DellaCorta, form letter dated January 15, 2019 (DellaCorta_FL2_1187)
1208. Michael DellaCorte, form letter dated January 15, 2019 (DellaCorte_FL2_583)
1209. Anne M. DelPrete, form letter dated January 15, 2019 (DelPrete_FL2_593)
1210. Michael Derby, form letter dated January 15, 2019 (Derby_FL2_1069)
1211. Eileen Desote, form letter dated March 1, 2019 (Desote_FL2_2615)
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

1212. Matthew Devitt, form letter dated January 15, 2019 (Devitt_FL2_613)
1213. Marcia Diffley, form letter dated February 4, 2019 (Diffley_FL2_2217)
1214. Petrina DiGange, form letter dated January 15, 2019 (DiGange_FL2_627)
1215. Andrew DiLorenzo, form letter dated January 15, 2019 (DiLorenzo_FL2_1172)
1216. Elizabeth DiMeo, form letter dated March 1, 2019 (DiMeo_FL2_2676)
1217. Douglas DiMeo, form letter dated March 1, 2019 (DiMeo_FL2_2677)
1218. Jeffrey DiMeo, form letter dated March 1, 2019 (DiMeo_FL2_2678)
1219. Lucille DiMola, form letter dated March 1, 2019 (DiMola_FL2_2620)
1220. Theresa DiPippa, form letter dated January 15, 2019 (DiPippa_FL2_660)
1221. Steven Disensa, form letter dated March 1, 2019 (Disensa_FL2_2657)
1222. Eileen Dispensa, form letter dated March 1, 2019 (Dispensa_FL2_2607)
1223. James Dodson, form letter dated January 15, 2019 (Dodson_FL2_1196)
1227. Sofia Dolan, form letter dated January 15, 2019 (Dolan_FL2_662)
1228. Diane Dommermuth, form letter dated January 15, 2019 (Dommermuth_FL2_505)
1229. Joan Donnelly, form letter dated January 15, 2019 (Donnelly_FL2_508)
1230. John Donnelly, form letter dated January 15, 2019 (Donnelly_FL2_1080)
1231. Fran Donnelly, form letter dated January 15, 2019 (Donnelly_FL2_1081)
1232. Gerard Donoghue, form letter dated March 1, 2019 (Donoghue_FL2_2623)
1233. Elaine Doster, form letter dated March 1, 2019 (Doster_FL2_2496)
1234. Vincent Dragone, form letter dated January 15, 2019 (Dragone_FL2_611)
1235. Anna Dragone, form letter dated January 15, 2019 (Dragone_FL2_612)
1236. Theresa Dragone-Meehan, form letter dated January 15, 2019 (Dragone-
Meehan_FL2_617)
1237. Patricia Dreyer, form letter dated January 15, 2019 (Dreyer_FL2_1147)
1238. Thomas Dreyer, form letter dated January 15, 2019 (Dreyer_FL2_1150)
1239. Amy Drogelis, form letter dated March 1, 2019 (Drogelis_FL2_2686)
1240. Monica Drogelis, form letter dated March 1, 2019 (Drogelis_FL2_2687)
1241. John Drogelis, form letter dated March 1, 2019 (Drogelis_FL2_2688)
1242. Patricia Drogelis, form letter dated March 1, 2019 (Drogelis_FL2_2690)
1243. Danielle Dunne, form letter dated March 1, 2019 (Dunne_FL2_2734)
1244. Kevin Dunne, form letter dated March 1, 2019 (Dunne_FL2_2735)
1245. Nancy Eisenhuth, form letter dated March 1, 2019 (Eisenhuth_FL2_2622)
1246. William F. Emmel, form letter dated January 15, 2019 (Emmel_FL2_1142)
1247. Patricia D. Eren, form letter dated January 15, 2019 (Eren_FL2_501)
1248. Helene Esposito, form letter dated January 15, 2019 (Esposito_FL2_1298)
1249. Francis Eusebio, form letter dated January 15, 2019 (Eusebio_FL2_546)
1250. Paraskevi Evola, form letter dated January 15, 2019 (Evola_FL2_591)
1251. Kenneth B. Fairben, form letter dated January 15, 2019 (Fairben_FL2_1185)
1252. Suzanne Falth, form letter dated January 15, 2019 (Falth_FL2_511)
1253. Christine M. Farrell, form letter dated January 15, 2019 (Farrell_FL2_642)
1254. James C. Farrell, form letter dated January 15, 2019 (Farrell_FL2_1265)
1255. Christine M. Farrell, form letter dated January 15, 2019 (Farrell_FL2_1266)
1256. Stephanie Fattorini, form letter dated January 15, 2019 (Fattorini_FL2_1260)
1257. Anne Marie Faughnan, form letter dated March 1, 2019 (Faughnan_FL2_2617)
1258. Peggy Fenton, form letter dated January 15, 2019 (Fenton_FL2_529)
1259. Debra Fenton, form letter dated January 15, 2019 (Fenton_FL2_1076)
1260. David Fernandez, form letter dated January 15, 2019 (Fernandez_FL2_1198)
1261. Susan M. Filshie, form letter dated January 15, 2019 (Filshie_FL2_562)
1262. John Filshie, form letter dated January 15, 2019 (Filshie_FL2_563)
1263. Lea Fisher, form letter dated March 1, 2019 (Fisher_FL2_2650)
1264. Kevin Fitzgerald, form letter dated January 15, 2019 (Fitzgerald_FL2_495)
1265. Jennifer Fitzgerald, form letter dated January 15, 2019 (Fitzgerald_FL2_1088)
1266. Kathryn Flood, form letter dated January 15, 2019 (Flood_FL2_631)
1267. Kathryn Flood, form letter dated January 15, 2019 (Flood_FL2_668)
1268. Kristin M. Flood, form letter dated January 15, 2019 (Flood_FL2_1143)
1269. Kevin J. Flood, form letter dated January 15, 2019 (Flood_FL2_1203)
1270. Susan Fox, form letter dated March 1, 2019 (Fox_FL2_2682)
1271. Kenneth Fox, form letter dated March 1, 2019 (Fox_FL2_2683)
1272. Lisa Foy, form letter dated January 15, 2019 (Foy_FL2_555)
1273. Stephen Foy, form letter dated January 15, 2019 (Foy_FL2_556)
1274. Elvira Franscischelli, form letter dated March 1, 2019 (Franscischelli_FL2_2631)
1275. Louis Franscischelli, form letter dated March 1, 2019 (Franscischelli_FL2_2633)
1276. R. Friedman, form letter dated January 15, 2019 (Friedman_FL2_539)
1277. Mabel M. Galanek, form letter dated January 15, 2019 (Galanek_FL2_1272)
1278. Catherine Galaoock, form letter dated March 1, 2019 (Galaock_FL2_2610)
1279. Melissa Gallaghah, form letter dated January 15, 2019 (Gallaghah_FL2_602)
1280. Gary Gallelli, form letter dated January 15, 2019 (Gallelli_FL2_603)
1281. Joseph Gambino, form letter dated January 15, 2019 (Gambino_FL2_1130)
1282. Louis Gammuauto, form letter dated January 15, 2019 (Gammuauto_FL2_1170)
1283. Donna Gammuauto, form letter dated January 15, 2019 (Gammuauto_FL2_1177)
1284. Robert Ganun, form letter dated January 15, 2019 (Ganun_FL2_1160)
1285. Patricia Ganun, form letter dated January 15, 2019 (Ganun_FL2_1161)
1286. George Garcia, form letter dated March 1, 2019 (Garcia_FL2_2708)
1287. Rosa Garcia, form letter dated March 1, 2019 (Garcia_FL2_2711)
1288. Joseph M. Gargiulo, form letter dated January 15, 2019 (Gargiulo_FL2_1271)
1289. Gilda Gately, form letter dated March 1, 2019 (Gately_FL2_2679)
1290. Matthew Gately, form letter dated March 1, 2019 (Gately_FL2_2684)
1291. Francis Gehrling, form letter dated March 1, 2019 (Gehrling_FL2_2447)
1292. Frederick Gehrling, form letter dated March 1, 2019 (Gehrling_FL2_2450)
1293. Noreen Gill, form letter dated January 15, 2019 (Gill_FL2_494)
1294. James Gill, form letter dated January 15, 2019 (Gill_FL2_1306)
1295. Jennifer Gill, form letter dated January 15, 2019 (Gill_FL2_1307)
1296. Kaitlyn Gill, form letter dated January 15, 2019 (Gill_FL2_1308)
1297. James Gill, form letter dated March 1, 2019 (Gill_FL2_2592)
1298. Jennifer Gill, form letter dated March 1, 2019 (Gill_FL2_2593)
1299. Kaitlyn Gill, form letter dated March 1, 2019 (Gill_FL2_2594)
1300. Gregory Girardi, form letter dated January 15, 2019 (Girardi_FL2_623)
1301. Christina Girardi, form letter dated January 15, 2019 (Girardi_FL2_624)
1302. Gregory Girardi, form letter dated January 15, 2019 (Girardi_FL2_634)
1303. Angela Girardi, form letter dated January 15, 2019 (Girardi_FL2_636)
1304. Elizabeth Glaser, form letter dated January 15, 2019 (Glaser_FL2_644)
1305. Sean Glennon, form letter dated January 15, 2019 (Glennon_FL2_1166)
1306. Lorraine Goodis, form letter dated January 15, 2019 (Goodis_FL2_559)
1307. P Gormley, form letter dated January 15, 2019 (Gormley_FL2_1107)
1308. Joseph Gormley, form letter dated January 15, 2019 (Gormley_FL2_1303)
1309. Kevin Gormley, form letter dated January 15, 2019 (Gormley_FL2_1304)
1310. Paterick Gormley, form letter dated March 1, 2019 (Gormley_FL2_2588)
1311. Joseph Gormley, form letter dated March 1, 2019 (Gormley_FL2_2589)
1312. Kevin Gormley, form letter dated March 1, 2019 (Gormley_FL2_2590)
1313. Walter E. Gosden, form letter dated January 15, 2019 (Gosden_FL2_669)
1314. Judith Greene, form letter dated January 15, 2019 (Greene_FL2_1168)
1315. Carol Gregorio, form letter dated March 1, 2019 (Gregorio_FL2_2640)
1316. Judith Grillo, form letter dated March 1, 2019 (Grillo_FL2_2724)
1317. Michael Grillo, form letter dated March 1, 2019 (Grillo_FL2_2725)
1318. Anne E. Groshans, form letter dated January 15, 2019 (Groshans_FL2_554)
1319. Nancy Gross, form letter dated January 15, 2019 (Gross_FL2_1164)
1320. A. Guadagno, form letter dated January 15, 2019 (Guadagno_FL2_549)
1321. Catherine Guadagno, form letter dated January 15, 2019 (Guadagno_FL2_553)
1322. Francis Gunziter, form letter dated January 15, 2019 (Gunziter_FL2_1254)
1324. James Handlin, form letter dated January 15, 2019 (Handlin_FL2_670)
1325. James Handlin, form letter dated January 15, 2019 (Handlin_FL2_1104)
1326. Paul Hanson, form letter dated January 15, 2019 (Hanson_FL2_1227)
1327. Crystal Harris, form letter dated March 1, 2019 (Harris_FL2_2612)
1328. Deborah Hastings, form letter dated January 15, 2019 (Hastings_FL2_1062)
1329. Josephine Haugh, form letter dated March 1, 2019 (Haugh_FL2_2703)
1330. John Haugh, form letter dated March 1, 2019 (Haugh_FL2_2705)
1331. Douglas J. Hayden, form letter dated January 15, 2019 (Hayden_FL2_1144)
1332. Una Hayden, form letter dated January 15, 2019 (Hayden_FL2_1162)
1334. William Hecker, form letter dated March 1, 2019 (Hecker_FL2_2635)
1335. PeggyAnne Hecker, form letter dated March 1, 2019 (Hecker_FL2_2637)
1336. Evelyn M. Hegler, form letter dated March 1, 2019 (Hegler_FL2_2427)
1337. Lauren Henderson, form letter dated January 15, 2019 (Henderson_FL2_1305)
1338. Lauren Henderson, form letter dated March 1, 2019 (Henderson_FL2_2591)
1339. Aileen Hennelly, form letter dated January 15, 2019 (Hennelly_FL2_560)
1340. Lynn Henry, form letter dated January 15, 2019 (Henry_FL2_1191)
1341. Carolyn Hieb, form letter dated January 15, 2019 (Hieb_FL2_1058)
1343. Pat Hill, form letter dated March 1, 2019 (Hill_FL2_2489)
1344. Robert Hoey, form letter dated March 1, 2019 (Hoey_FL2_2665)
1345. Thomas Holz, form letter dated January 15, 2019 (Holz_FL2_1222)
1346. Kathleen Hopkins, form letter dated January 15, 2019 (Hopkins_FL2_592)
1347. Suzanne Huber, form letter dated January 15, 2019 (Huber_FL2_1250)
1348. Karen Hughes, form letter dated January 15, 2019 (Hughes_FL2_520)
1349. Shanthy Hughes, form letter dated January 15, 2019 (Hughes_FL2_543)
1350. John Hughes, form letter dated January 15, 2019 (Hughes_FL2_1091)
1351. Claire Hughes, form letter dated January 15, 2019 (Hughes_FL2_1092)
1352. Winifred B. Hughes, form letter dated January 15, 2019 (Hughes_FL2_1111)
1353. John M. Hughes, form letter dated January 15, 2019 (Hughes_FL2_1112)
1354. Heathter Hughes, form letter dated January 15, 2019 (Hughes_FL2_1126)
Chapter 22: Response to Public Comments

1355. Daniel Hughes, form letter dated January 15, 2019 (Hughes_FL2_1283)
1357. Mary R. Kane, form letter dated January 15, 2019 (Kane_FL2_646)
1358. James Kane, form letter dated January 15, 2019 (Kane_FL2_1230)
1359. John F. Keenan, form letter dated January 15, 2019 (Keenan_FL2_577)
1360. Kathleen L. Keenan, form letter dated January 15, 2019 (Keenan_FL2_578)
1361. William Kelleher, form letter dated January 15, 2019 (Kelleher_FL2_587)
1362. Frances Kellner, form letter dated January 15, 2019 (Kellner_FL2_1114)
1363. Ann Kellner, form letter dated January 15, 2019 (Kellner_FL2_1167)
1364. Margaret A. Kelly, form letter dated January 15, 2019 (Kelly_FL2_1093)
1365. James Kelly, form letter dated January 15, 2019 (Kelly_FL2_1094)
1366. Jessica Kelly-Brown, form letter dated January 15, 2019 (Kelly-Brown_FL2_1183)
1367. Patrick M. Kenneally, form letter dated January 15, 2019 (Kenneally_FL2_1138)
1368. Luke Kenneally, form letter dated March 1, 2019 (Kenneally_FL2_2453)
1369. Ellen Kennealy, form letter dated March 1, 2019 (Kennealy_FL2_2469)
1370. Kevin Kennedy, form letter dated January 15, 2019 (Kennedy_FL2_1277)
1371. Amy Kerrigan, form letter dated January 15, 2019 (Kerrigan_FL2_616)
1373. Admen Khan, form letter dated January 15, 2019 (Khan_FL2_513)
1374. Fardoq Khawaja, form letter dated January 15, 2019 (Khawaja_FL2_1153)
1375. MaryLou King, form letter dated January 15, 2019 (King_FL2_1224)
1376. P. Kirby, form letter dated January 15, 2019 (Kirby_FL2_1146)
1377. Catherine Kirchhofer, form letter dated March 1, 2019 (Kirchhofer_FL2_2702)
1378. Kevin J. Kiss, form letter dated January 15, 2019 (Kiss_FL2_1257)
1379. Alexander M. Koester, form letter dated March 1, 2019 (Koester_FL2_2522)
1380. Andrew Kosinski, form letter dated March 1, 2019 (Kosinski_FL2_2710)
1381. Christine Kosinski, form letter dated March 1, 2019 (Kosinski_FL2_2712)
1382. Anthony Kruzynski, form letter dated January 15, 2019 (Kruzynski_FL2_1067)
1383. Emily Kruzynski, form letter dated January 15, 2019 (Kruzynski_FL2_1086)
1384. Thomas Kubler, form letter dated March 1, 2019 (Kubler_FL2_2696)
1385. Brian D. L, form letter dated January 15, 2019 (L_FL2_1262)
1386. Dana Laffey, form letter dated January 15, 2019 (Laffey_FL2_1121)
1387. Kathleen Lally, form letter dated January 15, 2019 (Lally_FL2_1151)
1388. Robert LaMarche, form letter dated January 15, 2019 (LaMarche_FL2_1251)
1389. Darlene Lanza, form letter dated January 15, 2019 (Lanza_FL2_1075)
1390. Frances Lanzetta, form letter dated January 15, 2019 (Lanzetta_FL2_659)
1391. Frances Lanzetta, form letter dated January 15, 2019 (Lanzetta_FL2_1074)
1392. Lisa Lanzetta, form letter dated January 15, 2019 (Lanzetta_FL2_1077)
1393. Elizabeth Lauria, form letter dated January 15, 2019 (Lauria_FL2_551)
1394. Maureen Laut, form letter dated March 1, 2019 (Laut_FL2_2733)
1395. Lauren Lavoie, form letter dated January 15, 2019 (Lavoie_Fl2_1163)
1396. Patricia Lennon, form letter dated March 1, 2019 (Lennon_FL2_2664)
1397. Meredith Libertadore, form letter dated January 15, 2019 (Libertadore_FL2_645)
1398. Elaine Licari, form letter dated January 15, 2019 (Licari_FL2_1155)
1399. V. Licari, form letter dated March 1, 2019 (Licari_FL2_2639)
1400. Carol J. Lipsky, form letter dated January 15, 2019 (Lipsky_FL2_652)
1401. Maria Locascio, form letter dated January 15, 2019 (Locascio_FL2_1268)
1402. Pia Loffus, form letter dated March 1, 2019 (Loffus_FL2_2718)
1403. Joseph Loffus, form letter dated March 1, 2019 (Loffus_FL2_2719)
1404. Regina Lohen, form letter dated January 15, 2019 (Lohen_FL2_1078)
1407. Denise Longobardi, form letter dated January 15, 2019 (Longobardi_FL2_1213)
1408. M Lovari, form letter dated January 15, 2019 (Lovari_FL2_650)
1409. Rose Lozano, form letter dated January 15, 2019 (Lozano_FL2_588)
1410. Lorraine Lubicich, form letter dated January 15, 2019 (Lubicich_FL2_630)
1411. Paul Lubicich, form letter dated January 15, 2019 (Lubicich_FL2_1237)
1412. Peggy Lyons, form letter dated January 15, 2019 ( Lyons_FL2_1145)
1413. Margaret MacDonald, form letter dated January 15, 2019 (MacDonald_FL2_1068)
1414. James E. MacDonald, form letter dated January 15, 2019 (MacDonald_FL2_1070)
1415. Maureen MacDonald, form letter dated January 15, 2019 (MacDonald_FL2_1117)
1416. Teresa MacDonald, form letter dated January 15, 2019 (MacDonald_FL2_1128)
1417. T Macko, form letter dated January 15, 2019 (Macko_FL2_651)
1418. Victoria Maclean, form letter dated January 15, 2019 (Maclean_FL2_561)
1419. Valerie Magee, form letter dated January 15, 2019 (Magee_FL2_606)
1420. Jim Mahone, form letter dated January 15, 2019 (Mahone_FL2_1084)
1422. Lorcan Malone, form letter dated January 15, 2019 (Malone_FL2_1120)
1423. Christopher Mancz, form letter dated March 1, 2019 (Mancz_FL2_2680)
1424. Jill Manning, form letter dated January 15, 2019 (Manning_FL2_510)
1425. Laurel Manning, form letter dated January 15, 2019 (Manning_FL2_550)
1426. Maggie Mansfield, form letter dated January 8, 2019 (Mansfield_FL2_076)
1427. Thomas Mansfield, form letter dated January 8, 2019 (Mansfield_FL2_077)
1428. Maureen Mansfield, form letter dated January 8, 2019 (Mansfield_FL2_078)
1429. Maggie Mansfield, form letter dated January 8, 2019 (Mansfield_FL2_1291)
1430. Thomas Mansfield, form letter dated January 8, 2019 (Mansfield_FL2_1292)
1431. Maureen Mansfield, form letter dated January 8, 2019 (Mansfield_FL2_1293)
1432. Lenore Marchiano, form letter dated January 15, 2019 (Marchiano_FL2_1113)
1433. Janet Marino, form letter dated March 1, 2019 (Marino_FL2_2435)
1434. Nancy Marino, form letter dated March 1, 2019 (Marino_FL2_2531)
1435. Patricia Martinez, form letter dated January 15, 2019 (Martinez_FL2_1201)
1436. Edward Martinez, form letter dated March 1, 2019 (Martinez_FL2_2649)
1437. Sally Martucci, form letter dated January 15, 2019 (Martucci_FL2_540)
1438. Robert Martucci, form letter dated January 15, 2019 (Martucci_FL2_541)
1439. Mary Jane Mastrella, form letter dated January 15, 2019 (Mastrella_FL2_1281)
1440. Michele Mayo, form letter dated January 15, 2019 (Mayo_FL2_528)
1441. Melissa Mazzicco, form letter dated March 1, 2019 (Mazzicco_FL2_2621)
1442. Frank & Peg McCaffrey, form letter dated January 15, 2019 (McCaffrey_FL2_1242)
1444. Brian McClintock, form letter dated January 15, 2019 (McClintock_FL2_1124)
1445. Heather McClintock, form letter dated January 15, 2019 (McClintock_FL2_1181)
1446. Patricia McCormack, form letter dated January 15, 2019 (McCormack_FL2_493)
1447. Dana McCoy, form letter dated January 15, 2019 (McCoy_FL2_589)
1448. Anne Marie McGeever, form letter dated January 15, 2019 (McGeever_FL2_1255)
1449. Matthew McGeever, form letter dated March 1, 2019 (McGeever_FL2_2604)
1450. Anne Marie McGeever, form letter dated March 1, 2019 (McGeever_FL2_2605)
Chapter 22: Response to Public Comments

1453.  Brian McGovern, form letter dated January 15, 2019 (McGovern_FL2_1157)
1454.  Leah McGovern, form letter dated January 15, 2019 (McGovern_FL2_1234)
1458.  Angela McGuire, form letter dated January 15, 2019 (McGuire_FL2_1129)
1460.  Brian McHale, form letter dated January 15, 2019 (McHale_FL2_1208)
1461.  J McLoughlin, form letter dated March 1, 2019 (McLoughlin_FL2_2713)
1462.  Heather McNamara, form letter dated January 15, 2019 (McNamara_FL2_1299)
1463.  Thomas Merle, form letter dated January 15, 2019 (Merle_FL2_1287)
1464.  Russell Mesnick, form letter dated January 15, 2019 (Mesnick_FL2_1231)
1465.  Kyle Meyfohrt, form letter dated January 15, 2019 (Meyfohrt_FL2_1071)
1466.  Kurt Meyfohrt, form letter dated January 15, 2019 (Meyfohrt_FL2_1072)
1467.  Deborah Meyfohrt, form letter dated January 15, 2019 (Meyfohrt_FL2_1073)
1468.  Donald Mezzett, form letter dated January 15, 2019 (Mezzett_FL2_1149)
1469.  Mia Minogue, form letter dated January 15, 2019 (Minogue_FL2_614)
1470.  Deirdre Moore, form letter dated March 1, 2019 (Moore_FL2_2626)
1471.  Brigid Mormorowski, form letter dated January 15, 2019 (Mormorowski_FL2_1195)
1472.  Shannon Moroney, form letter dated January 15, 2019 (Moroney_FL2_564)
1473.  Thomas J. Moroney, form letter dated January 15, 2019 (Moroney_FL2_628)
1474.  Kathleen M. Morrongello, form letter dated January 15, 2019 (Morrongello_FL2_1221)
1475.  Asmaa Mounir, form letter dated January 15, 2019 (Mounir_FL2_531)
1476.  Neil Mulhall, form letter dated January 15, 2019 (Mulhall_FL2_1216)
1477.  John Mulhall, form letter dated January 15, 2019 (Mulhall_FL2_1274)
1478.  Kathleen Mulhall, form letter dated January 15, 2019 (Mulhall_FL2_1279)
1479.  Marc Mullen, form letter dated January 15, 2019 (Mullen_FL2_1204)
1480.  Elizabeth Mullen, form letter dated January 15, 2019 (Mullen_FL2_1269)
1481.  Judy Muller, form letter dated January 15, 2019 (Muller_FL2_595)
1482.  Alfred Muller, form letter dated January 15, 2019 (Muller_FL2_1139)
1483.  Kathy Muller, form letter dated January 15, 2019 (Muller_FL2_1184)
1484.  Sheila Mulligan, form letter dated January 15, 2019 (Mulligan_FL2_654)
1485.  Paul Muraski, form letter dated March 1, 2019 (Muraski_FL2_2419)
1486.  Mike Murphy, form letter dated January 15, 2019 (Murphy_FL2_600)
1487.  Camille E. Murphy, form letter dated January 15, 2019 (Murphy_FL2_661)
1488.  Devin Murphy, form letter dated January 15, 2019 (Murphy_FL2_1219)
1489.  Nancy Muscat, form letter dated January 15, 2019 (Muscat_FL2_533)
1490.  Saralynn S. Musynske, form letter dated January 15, 2019 (Musynske_FL2_609)
1491.  John Musynske, form letter dated January 15, 2019 (Musynske_FL2_610)
1492.  Christina Nardella, form letter dated January 15, 2019 (Nardella_FL2_590)
1494.  Paul Naronis, form letter dated March 1, 2019 (Naronis_FL2_2645)
1495.  Stephanie Naronis, form letter dated March 1, 2019 (Naronis_FL2_2647)
1496.  Brian Naughton, form letter dated January 15, 2019 (Naughton_FL2_1276)
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

1500. Vickey Niles, form letter dated January 15, 2019 (Niles_FL2_598)
1501. Anthony Norcia, form letter dated March 1, 2019 (Norcia_FL2_2672)
1502. Tara Nugent, form letter dated January 15, 2019 (Nugent_FL2_594)
1503. TeriAnn Nummey, form letter dated March 1, 2019 (Nummey_FL2_2630)
1504. MK O'Brien, form letter dated January 15, 2019 (O'Brien_FL2_515)
1506. Terry O'Brien, form letter dated January 15, 2019 (O'Brien_FL2_1156)
1509. Diane O'Donnell, form letter dated January 15, 2019 (O'Donnell_FL2_516)
1510. Mary O'Donoghue, form letter dated January 15, 2019 (O'Donoghue_FL2_640)
1511. John O'Donoghue, form letter dated January 15, 2019 (O'Donoghue_FL2_641)
1512. Jaclyn O'Donohue, form letter dated January 15, 2019 (O'Donohue_FL2_527)
1513. M. O'Donohue, form letter dated January 15, 2019 (O'Donohue_FL2_1244)
1514. R. O'Donohue, form letter dated January 15, 2019 (O'Donohue_FL2_1246)
1515. Maria O'Grady, form letter dated January 15, 2019 (O'Grady_FL2_1248)
1516. Joseph O'Grady, form letter dated January 15, 2019 (O'Grady_FL2_1249)
1517. Margaret O'Keefe, form letter dated January 15, 2019 (O'Keefe_FL2_522)
1518. Melissa O'Leary, form letter dated January 15, 2019 (O'Leary_FL2_532)
1519. Bernard O'Malley, form letter dated January 15, 2019 (O'Malley_FL2_1312)
1520. Mary O'Malley, form letter dated January 15, 2019 (O'Malley_FL2_1313)
1521. Nicholas O'Malley, form letter dated January 15, 2019 (O'Malley_FL2_1314)
1522. Bernard O'Malley, form letter dated March 1, 2019 (O'Malley_FL2_2598)
1523. Mary Jane O'Malley, form letter dated March 1, 2019 (O'Malley_FL2_2599)
1524. Nicholas O'Malley, form letter dated March 1, 2019 (O'Malley_FL2_2600)
1525. Dian Mills O'Reilly, form letter dated January 15, 2019 (O'Reilly_FL2_1108)
1526. Siobhan O'Reilly, form letter dated January 15, 2019 (O'Reilly_FL2_552)
1527. Anne Marie Olton, form letter dated January 15, 2019 (Olton_FL2_526)
1528. Maria Olynec, form letter dated January 15, 2019 (Olynec_FL2_547)
1529. Christine Orkwis, form letter dated January 15, 2019 (Orkwis_FL2_599)
1530. Maria E. Ortega, form letter dated January 15, 2019 (Ortega_FL2_530)
1531. Damon Oscarson, form letter dated March 1, 2019 (Oscarson_FL2_2660)
1532. Kimberly Oscarson, form letter dated March 1, 2019 (Oscarson_FL2_2661)
1533. Tara Palacios, form letter dated March 1, 2019 (Palacios_FL2_2625)
1534. Emilia Palamara, form letter dated March 1, 2019 (Palamara_FL2_2415)
1535. Christopher Palazsco, form letter dated January 15, 2019 (Palazsco_FL2_585)
1536. John Paley, form letter dated January 15, 2019 (Paley_FL2_1245)
1537. Laura Pape, form letter dated January 15, 2019 (Pape_FL2_524)
1538. Michelle Pappas, form letter dated March 1, 2019 (Pappas_FL2_2618)
1539. Diane Paszkiewicz, form letter dated March 1, 2019 (Paszkiewicz_FL2_2514)
1540. Ralph Paterno, form letter dated January 15, 2019 (Paterno_FL2_1218)
1541. Terry Paterno, form letter dated January 15, 2019 (Paterno_FL2_1288)
1542. Patricia V. Pedley, form letter dated March 1, 2019 (Pedley_FL2_2423)
1543. Kathryn L. Peiser, form letter dated January 15, 2019 (Peiser_FL2_1197)
1544. John Peiser, form letter dated January 15, 2019 (Peiser_FL2_1211)
1545. Rachel Penteck, form letter dated March 1, 2019 (Penteck_FL2_2608)
1546. William Penteck, form letter dated March 1, 2019 (Penteck_FL2_2609)
1547. Kaitlyn Perge, form letter dated January 11, 2019 (Perge_FL2_138)
1548. John C. Perry, form letter dated January 15, 2019 (Perry_FL2_1214)
1549. Danielle Persainpire, form letter dated March 1, 2019 (Persainpire_FL2_2685)
1550. Joseph Petrosino, form letter dated March 1, 2019 (Petrosino_FL2_2407)
1551. Neil Petrosino, form letter dated March 1, 2019 (Petrosino_FL2_2411)
1552. Uliana Petrosino, form letter dated March 1, 2019 (Petrosino_FL2_2441)
1553. Carl Petrosino, form letter dated March 1, 2019 (Petrosino_FL2_2515)
1554. Mary Pfeiffer, form letter dated January 15, 2019 (Pfeiffer_FL2_1263)
1556. Robert Phillips, form letter dated March 1, 2019 (Phillips_FL2_2587)
1557. Julius Picardi, form letter dated January 15, 2019 (Picardi_FL2_1089)
1558. Anne Pollack, form letter dated January 15, 2019 (Pollack_FL2_1243)
1559. Virginia Pourakis, form letter dated March 1, 2019 (Pourakis_FL2_2606)
1560. Megan Power, form letter dated January 15, 2019 (Power_FL2_1106)
1561. Daniel Praino, form letter dated January 15, 2019 (Praino_FL2_1148)
1562. Kristine Prestia, form letter dated January 15, 2019 (Prestia_FL2_538)
1563. Christopher Prestia, form letter dated January 15, 2019 (Prestia_FL2_1085)
1564. Gregory Prymaczek, form letter dated January 15, 2019 (Prymaczek_FL2_1295)
1565. Eileen Prymaczek, form letter dated January 15, 2019 (Prymaczek_FL2_1296)
1566. Brain Puma, form letter dated March 1, 2019 (Puma_FL2_2717)
1567. Laura Puma, form letter dated March 1, 2019 (Puma_FL2_2720)
1568. Kathryn Quaderer, form letter dated January 15, 2019 (Quaderer_FL2_1109)
1569. Lourdes Quijano, form letter dated January 15, 2019 (Quijano_FL2_1119)
1570. Roger Raiford, form letter dated January 15, 2019 (Raiford_FL2_1173)
1571. John Raleigh, form letter dated January 15, 2019 (Raleigh_FL2_565)
1572. Bridget Raleigh, form letter dated January 15, 2019 (Raleigh_FL2_566)
1573. Luise E. Ranegan, form letter dated January 15, 2019 (Ranegan_FL2_629)
1574. Fran Rasquin, form letter dated January 15, 2019 (Rasquin_FL2_626)
1575. Chris Rasquin, form letter dated January 15, 2019 (Rasquin_FL2_635)
1576. Janet Reid, form letter dated March 1, 2019 (Reid_FL2_2727)
1577. Liz Reisch, form letter dated January 15, 2019 (Reisch_FL2_1252)
1578. Mark Reisig, form letter dated January 15, 2019 (Reisig_FL2_1152)
1579. Christine Reisig, form letter dated January 15, 2019 (Reisig_FL2_1212)
1580. Amy Richardson, form letter dated January 15, 2019 (Richardson_FL2_579)
1581. Tamara Richardson-Monde, form letter dated March 1, 2019 (Richardson-Monde_FL2_2627)
1582. Lynn Riofrio, form letter dated January 15, 2019 (Riofrio_FL2_519)
1583. Daniel Riordan, form letter dated March 1, 2019 (Riordan_FL2_2461)
1584. Tracey Riordan, form letter dated March 1, 2019 (Riordan_FL2_2465)
1585. Joseph Rispoli, form letter dated March 1, 2019 (Rispoli_FL2_2700)
1586. Milagros Rivera, form letter dated March 1, 2019 (Rivera_FL2_2701)
1587. Sharon Rivilli, form letter dated January 15, 2019 (Rivilli_FL2_568)
1588. Frank Rivilli, form letter dated January 15, 2019 (Rivilli_FL2_570)
1589. Jane Rizzo, form letter dated January 15, 2019 (Rizzo_FL2_506)
1590. Dennis J. Roller, form letter dated January 15, 2019 (Roller_FL2_1063)
1591. Donna Roller, form letter dated January 15, 2019 (Roller_FL2_1064)
1592. Michaela Roller, form letter dated January 15, 2019 (Roller_FL2_1065)
1593. Janet Romano Murray, form letter dated January 15, 2019 (Romano Murray_FL2_1253)
1594. Patricia Ronan, form letter dated January 15, 2019 (Ronan_FL2_580)
1595. James Rooney, form letter dated March 1, 2019 (Rooney_FL2_2651)
1596. Azbela Rooney, form letter dated March 1, 2019 (Rooney_FL2_2652)
1597. Paula Rowe, form letter dated January 15, 2019 (Rowe_FL2_637)
1598. Jonathan Rueda, form letter dated March 1, 2019 (Rueda_FL2_2728)
1599. M Ruscica, form letter dated January 15, 2019 (Ruscica_FL2_1135)
1600. Kathleen M. Ryan, form letter dated January 15, 2019 (Ryan_FL2_536)
1601. Michelle Ryan, form letter dated January 15, 2019 (Ryan_FL2_1110)
1602. Sundas Salman, form letter dated January 15, 2019 (Salman_FL2_517)
1603. Christopher Salogub, form letter dated January 15, 2019 (Salogub_FL2_1116)
1604. Allen Sankovitch, form letter dated January 15, 2019 (Sankovitch_FL2_512)
1605. Anne Marie Santangelo, form letter dated January 15, 2019 (Santangelo_FL2_507)
1606. Vito Santoruvo, form letter dated January 15, 2019 (Santoruvo_FL2_581)
1607. Daisy Santoruvo, form letter dated January 15, 2019 (Santoruvo_FL2_582)
1608. Elizabeth Santos, form letter dated January 15, 2019 (Santos_FL2_545)
1609. Eugena & Robert Sarro, form letter dated January 15, 2019 (Sarro_FL2_1199)
1610. Linda Sartini, form letter dated March 1, 2019 (Sartini_FL2_2613)
1611. Robert M. Savage, form letter dated January 15, 2019 (Savage_FL2_1133)
1612. Michael Saville, form letter dated January 15, 2019 (Saville_FL2_664)
1613. Thomas Saville, form letter dated January 15, 2019 (Saville_FL2_667)
1614. Deborah Sawicho, form letter dated January 15, 2019 (Sawicho_FL2_1228)
1615. Margaret Schlecht, form letter dated January 15, 2019 (Schlecht_FL2_632)
1616. Kenneth Schlecht, form letter dated January 15, 2019 (Schlecht_FL2_633)
1617. Michelle Schneider, form letter dated March 1, 2019 (Schneider_FL2_2601)
1618. William Schneider, form letter dated March 1, 2019 (Schneider_FL2_2722)
1619. William Schneider, form letter dated March 1, 2019 (Schneider_FL2_2732)
1620. Evelyn Schultz, form letter dated January 15, 2019 (Schultz_FL2_492)
1621. Carol Scime-Raiford, form letter dated January 15, 2019 (Scime-Raiford_FL2_1171)
1622. Amy Sebber, form letter dated January 15, 2019 (Sebber_FL2_653)
1623. Joe Serra, form letter dated January 15, 2019 (Serra_FL2_1180)
1624. Steven Settele, form letter dated January 15, 2019 (Settele_FL2_1220)
1625. Gina Settele, form letter dated January 15, 2019 (Settele_FL2_1286)
1626. Amy Sexton, form letter dated January 15, 2019 (Sexton_FL2_567)
1627. Matthew Sexton, form letter dated January 15, 2019 (Sexton_FL2_1131)
1628. John Sexton, form letter dated January 15, 2019 (Sexton_FL2_1275)
1629. Kathleen P. Shaw, form letter dated January 15, 2019 (Shaw_FL2_1267)
1630. Greg Sheth, form letter dated March 1, 2019 (Sheth_FL2_2674)
1631. Peter Shevln, form letter dated March 1, 2019 (Shevln_FL2_2675)
1632. Nera Shevln, form letter dated March 1, 2019 (Shevln_FL2_2692)
1633. Terry Sica, form letter dated January 15, 2019 (Sica_FL2_542)
1634. Thomas Sigismonti, form letter dated January 15, 2019 (Sigismonti_FL2_1182)
1635. Lisa Sindoni, form letter dated January 15, 2019 (Sindoni_FL2_1297)
1636. Timothy Slavin, form letter dated March 1, 2019 (Slavin_FL2_2662)
1637. Stacy Slavin, form letter dated March 1, 2019 (Slavin_FL2_2663)
1638. Alex Slavin, form letter dated March 1, 2019 (Slavin_FL2_2716)
1639. Siobhan Smith, form letter dated January 15, 2019 (Smith_FL2_648)
1640. Thomas G. Smith, form letter dated January 15, 2019 (Smith_FL2_1159)
1641. Pooran Sohan, form letter dated January 15, 2019 (Sohan_FL2_607)
Chapter 22: Response to Public Comments

1642. Prajapatee Sohan, form letter dated January 15, 2019 (Sohan_FL2_608)
1643. Anne Marie Soviero, form letter dated March 1, 2019 (Soviero_FL2_2668)
1644. John Speck, form letter dated January 15, 2019 (Speck_FL2_557)
1645. Maggie Speck, form letter dated January 15, 2019 (Speck_FL2_558)
1646. Cheryl Spigonardo, form letter dated January 15, 2019 (Spigonardo_FL2_1103)
1647. Vanessa Spinner, form letter dated January 15, 2019 (Spinner_FL2_503)
1648. Marilyn J. Sprague, form letter dated January 15, 2019 (Sprague_FL2_1232)
1649. Stephen Sprague, form letter dated January 15, 2019 (Sprague_FL2_1233)
1650. Margaret Sullivan, form letter dated January 15, 2019 (Sullivan_FL2_1098)
1653. Carolyn Susino, form letter dated January 15, 2019 (Susino_FL2_1309)
1654. Carolyn Susino, form letter dated March 1, 2019 (Susino_FL2_2595)
1655. Tara Sweeney, form letter dated January 15, 2019 (Sweeney_FL2_534)
1656. Kathy Sweeney, form letter dated January 15, 2019 (Sweeney_FL2_537)
1657. Helena Swierkosz, form letter dated March 1, 2019 (Swierkosz_FL2_2510)
1658. Kathleen Szola, form letter dated March 1, 2019 (Szola_FL2_2655)
1659. Joseph Szola, form letter dated March 1, 2019 (Szola_FL2_2656)
1660. Paul Szymanski, form letter dated January 8, 2019 (Szymanski_FL2_074)
1661. Paul Szymanski, form letter dated January 15, 2019 (Szymanski_FL2_1289)
1662. Joan Talamo, form letter dated January 15, 2019 (Talamo_FL2_666)
1663. Theresa Tam, form letter dated March 1, 2019 (Tam_FL2_2602)
1664. Douglas Tam, form letter dated March 1, 2019 (Tam_FL2_2603)
1665. Ingrid S. Taveras, form letter dated January 15, 2019 (Taveras_FL2_1225)
1666. Shannon Tengi, form letter dated March 1, 2019 (Tengi_FL2_2666)
1667. Christopher Tengi, form letter dated March 1, 2019 (Tengi_FL2_2667)
1668. Christine Thorpe, form letter dated January 15, 2019 (Thorpe_FL2_1174)
1669. George Torres, form letter dated January 15, 2019 (Torres_FL2_649)
1670. Mary Towey, form letter dated January 15, 2019 (Towey_FL2_1132)
1671. Michael Towey, form letter dated January 15, 2019 (Towey_FL2_1284)
1672. John T. Trainor, form letter dated January 15, 2019 (Trainor_FL2_1118)
1673. Kate Trainor, form letter dated January 15, 2019 (Trainor_FL2_1285)
1674. John Trainor, form letter dated March 1, 2019 (Trainor_FL2_2697)
1675. Ann Trainor, form letter dated March 1, 2019 (Trainor_FL2_2698)
1676. Laura J. Trentacoste, form letter dated January 15, 2019 (Trentacoste_FL2_1102)
1677. Sal & Marina Trentacoste, form letter dated January 15, 2019 (Trentacoste_FL2_1179)
1678. Amanda Tripmacher, form letter dated March 1, 2019 (Tripmacher_FL2_2624)
1679. Tim Turmi, form letter dated March 1, 2019 (Turmi_FL2_2405)
1680. Steven Turner, form letter dated March 1, 2019 (Turner_FL2_2628)
1681. Catherine Tutrone, form letter dated March 1, 2019 (Tutrone_FL2_2642)
1682. Paul Tutrone, form letter dated March 1, 2019 (Tutrone_FL2_2643)
1683. Thomas J. Tweedy, form letter dated January 15, 2019 (Tweedy_FL2_1202)
1684. Roy Tyson, form letter dated January 15, 2019 (Tyson_FL2_1226)
1685. Unknown, form letter dated March 1, 2019 (Unknown_FL2_2485)
1686. Unknown, form letter dated March 1, 2019 (Unknown_FL2_2506)
1687. unknown, form letter dated March 1, 2019 (unknown_FL2_2699)
1688. Michael Valaner, form letter dated January 15, 2019 (Valaner_FL2_657)
1689. Trisha Vecchione, form letter dated February 25, 2019 (Vecchione_FL2_2325)
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

1690.  Joseph Vemtimigla, form letter dated January 15, 2019 (Vemtimigla_FL2_1210)
1691.  Bernadette Verda, form letter dated January 15, 2019 (Verda_FL2_1316)
1692.  Paul Viggiano, form letter dated March 1, 2019 (Viggiano_FL2_2586)
1693.  Christina Vincent, form letter dated January 15, 2019 (Vincent_FL2_514)
1694.  Linda Vota, form letter dated January 15, 2019 (Vota_FL2_647)
1695.  Matthew W, form letter dated January 15, 2019 (W_FL2_1200)
1696.  Kathleen Wagner-Tyson, form letter dated January 15, 2019 (Wagner-
       Tyson_FL2_1205)
1697.  Lester F. Wahrenberg, form letter dated January 15, 2019 (Wahrenberg_FL2_1223)
1698.  Caroline Ward, form letter dated January 15, 2019 (Ward_FL2_1060)
1700.  Tracy Ward, form letter dated January 15, 2019 (Ward_FL2_1066)
1701.  Margaret Weickert, form letter dated January 15, 2019 (Weickert_FL2_1239)
1702.  Janet Wille, form letter dated January 15, 2019 (Wille_FL2_499)
1703.  Steve Winters, form letter dated January 15, 2019 (Winters_FL2_1137)
1704.  George Wrage, form letter dated January 15, 2019 (Wrage_FL2_1115)
1705.  Linnga Wrage, form letter dated January 15, 2019 (Wrage_FL2_1165)
1706.  Elizabeth Wysocki, form letter dated January 15, 2019 (Wysocki_FL2_638)
1708.  Herbert Zachner, form letter dated January 15, 2019 (Zachner_FL2_1238)
1709.  Jennifer Zampini, form letter dated March 1, 2019 (Zampini_FL2_2723)
1710.  Alfonzo Zampini, form letter dated March 1, 2019 (Zampini_FL2_2726)
1711.  Kerry Zilepa, form letter dated March 1, 2019 (Zilepa_FL2_2673)
1712.  Joseph Zoleta, form letter dated March 1, 2019 (Zoleta_FL2_2658)
1713.  Jane Zoleta, form letter dated March 1, 2019 (Zoleta_FL2_2659)

FORM LETTER 3

1714.  Jasmine Abel, form letter dated January 10, 2019 (Abel_FL3_268)
1715.  John Abel, form letter dated January 8, 2019 (Abel_FL3_1659)
1716.  Karina Acosta, form letter dated March 1, 2019 (Acosta_FL3_3039)
1717.  Robert Adler, form letter dated March 1, 2019 (Adler_FL3_2965)
1718.  Melissa Adler, form letter dated March 1, 2019 (Adler_FL3_2975)
1719.  Joseph Alfonsi, form letter dated January 8, 2019 (Alfonsi_FL3_1660)
1720.  Carol Ali, form letter dated January 8, 2019 (Ali_FL3_1686)
1721.  Madelaine Aliano, form letter dated January 10, 2019 (Aliano_FL3_162)
1722.  Pilar Alvarado, form letter dated March 1, 2019 (Alvarado_FL3_2953)
1723.  Patricia Ambrose, form letter dated March 1, 2019 (Ambrose_FL3_2958)
1724.  Joseph Ambrose, form letter dated March 1, 2019 (Ambrose_FL3_2960)
1725.  Karen Anoushian, form letter dated January 8, 2019 (Anoushian_FL3_1581)
1726.  Karl Anoushian, form letter dated January 8, 2019 (Anoushian_FL3_1585)
1727.  George Armstrong, form letter dated January 10, 2019 (Armstrong_FL3_231)
1728.  Linda Armstrong, form letter dated January 10, 2019 (Armstrong_FL3_232)
1729.  Salvatore Arrigo, form letter dated January 8, 2019 (Arrigo_FL3_1644)
1730.  Janet Attanasio, form letter dated January 8, 2019 (Attanasio_FL3_1715)
1731.  Eileen Avigliano, form letter dated March 1, 2019 (Avisgliano_FL3_3016)
1732.  Baccari, form letter dated March 1, 2019 (Baccari_FL3_3023)
1733.  Gail Baccari, form letter dated January 10, 2019 (Baccari_FL3_308)
1734.  Keith Baccari, form letter dated January 10, 2019 (Baccari_FL3_309)

22-370
Chapter 22: Response to Public Comments

1735. Dorothy Baccari, form letter dated January 16, 2019 (Baccari_FL3_1816)
1736. Sandra Bailey, form letter dated January 10, 2019 (Bailey_FL3_258)
1737. Victoria Baklasian, form letter dated March 1, 2019 (Baklasian_FL3_2900)
1738. Joseph Barlin, form letter dated March 1, 2019 (Barlin_FL3_2955)
1739. Jennifer Battaglia, form letter dated January 23, 2019 (Battaglia_FL3_2109)
1740. Vincent Battaglia, form letter dated January 23, 2019 (Battaglia_FL3_2110)
1741. Theresa Battaglia, form letter dated January 23, 2019 (Battaglia_FL3_2112)
1742. Theresa Battaglia, form letter dated March 1, 2019 (Battaglia_FL3_2980)
1743. Vincent Battaglia, form letter dated March 1, 2019 (Battaglia_FL3_2982)
1744. Jennifer Battaglia, form letter dated March 1, 2019 (Battaglia_FL3_2984)
1745. Jaclyn Battylin, form letter dated January 10, 2019 (Battylin_FL3_158)
1746. Victoria Bavlin, form letter dated March 1, 2019 (Bavlin_FL3_2941)
1747. Linda Beck, form letter dated January 8, 2019 (Beck_FL3_1611)
1748. Brendan Beebe, form letter dated March 1, 2019 (Beebe_FL3_2927)
1749. Patricia E. Bellear, form letter dated March 1, 2019 (Bellear_FL3_2533)
1750. Eileen Bellusci, form letter dated February 4, 2019 (Bellusci_FL3_2214)
1751. Frank Binkley, form letter dated January 8, 2019 (Binkley_FL3_1614)
1752. Vicki Binkley, form letter dated January 8, 2019 (Binkley_FL3_1621)
1753. Stephen Boettcher, form letter dated March 1, 2019 (Boettcher_FL3_3002)
1754. Dana Bonomo, form letter dated January 8, 2019 (Bonomo_FL3_1798)
1755. Jane Bonvicin, form letter dated January 10, 2019 (Bonvicin_FL3_228)
1756. Robert Bonvicin, form letter dated January 10, 2019 (Bonvicin_FL3_229)
1757. Laura Botka, form letter dated March 1, 2019 (Botka_FL3_2932)
1758. Geraldine Brand, form letter dated January 10, 2019 (Brand_FL3_183)
1759. George T. Braun, form letter dated March 1, 2019 (Braun_FL3_2473)
1760. Teresa Braun, form letter dated March 1, 2019 (Braun_FL3_2477)
1761. Cristina Brennan, form letter dated January 8, 2019 (Brennan_FL3_1740)
1762. John Brosheny, form letter dated March 1, 2019 (Brosheny_FL3_2904)
1763. Chester A. Brown, form letter dated January 8, 2019 (Brown_FL3_1658)
1764. Michael Brown, form letter dated January 16, 2019 (Brown_FL3_1815)
1765. Carolyn Browne, form letter dated January 10, 2019 (Browne_FL3_230)
1766. Susan Bruning, form letter dated March 1, 2019 (Bruning_FL3_2968)
1767. Werner Bruning, form letter dated March 1, 2019 (Bruning_FL3_2970)
1768. Nancy Buechler, form letter dated January 9, 2019 (Buechler_FL3_030)
1769. John C. Buechler, form letter dated January 9, 2019 (Buechler_FL3_031)
1770. Richard Burgess, form letter dated January 8, 2019 (Burgess_FL3_1792)
1771. Genevieve Burke, form letter dated March 1, 2019 (Burke_FL3_2902)
1772. Denis Burke, form letter dated March 1, 2019 (Burke_FL3_3027)
1773. Ann-Marie Burke, form letter dated March 1, 2019 (Burke_FL3_3028)
1774. Carolyn Burke, form letter dated March 1, 2019 (Burke_FL3_3029)
1775. Thomas Byrnes, form letter dated January 8, 2019 (Byrnes_FL3_1664)
1776. Patrick J. Caldon, form letter dated January 14, 2019 (Caldon_FL3_318)
1777. Lynn Caleri, form letter dated January 8, 2019 (Caleri_FL3_1762)
1778. Catherine Callan, form letter dated January 10, 2019 (Callan_FL3_154)
1779. Charles Callan, form letter dated January 8, 2019 (Callan_FL3_1726)
1780. Maria Calvo, form letter dated March 1, 2019 (Calvo_FL3_2922)
1781. Rosalie Cancellarich, form letter dated January 10, 2019 (Cancellarich_FL3_261)
1782. Steve Cancellarich, form letter dated January 10, 2019 (Cancellarich_FL3_262)
1783. Victoria Caponigro, form letter dated January 10, 2019 (Caponigro_FL3_296)
1784. Kristin Caputo, form letter dated January 8, 2019 (Caputo_FL3_1584)
1785. Joan Cardone, form letter dated March 1, 2019 (Cardone_FL3_2946)
1786. John Cardone, form letter dated March 1, 2019 (Cardone_FL3_2948)
1787. Patrick Carmody, form letter dated March 1, 2019 (Carmody_FL3_2974)
1788. Elizabeth Carollo, form letter dated January 23, 2019 (Carollo_FL3_2111)
1789. Elizabeth Carollo, form letter dated March 1, 2019 (Carollo_FL3_2985)
1790. Kevin Carr, form letter dated March 1, 2019 (Carr_FL3_2919)
1791. Athene Carr, form letter dated March 1, 2019 (Carr_FL3_2926)
1792. Bradley Carrell, form letter dated January 31, 2019 (Carrell_FL3_2208)
1793. Erika L. Carrell, form letter dated January 31, 2019 (Carrell_FL3_2209)
1794. Ann Marie Cartwright, form letter dated January 8, 2019 (Cartwright_FL3_063)
1795. Anne Marie Cartwright, form letter dated January 8, 2019 (Cartwright_FL3_1810)
1796. Mary Cassidy, form letter dated March 1, 2019 (Cassidy_FL3_2500)
1797. Vincent Cauvella, form letter dated March 1, 2019 (Cauvella_FL3_2971)
1798. Joseph Chalmers, form letter dated January 10, 2019 (Chalmers_FL3_176)
1799. Nicole Chattertan, form letter dated January 10, 2019 (Chattertan_FL3_179)
1800. Edward Chatterton, form letter dated January 8, 2019 (Chatterton_FL3_1745)
1801. Steven Cheng, form letter dated January 8, 2019 (Cheng_FL3_1761)
1802. Arlene Chianese, form letter dated March 1, 2019 (Chianese_FL3_2527)
1803. Edward Chiodo, form letter dated January 8, 2019 (Chiodo_FL3_1645)
1804. Kathleen M. Clark, form letter dated March 1, 2019 (Clark_FL3_2482)
1805. Joseph Clements, form letter dated March 1, 2019 (Clements_FL3_3038)
1806. Brian Cody, form letter dated January 8, 2019 (Cody_FL3_1730)
1807. Regina Cohen, form letter dated January 8, 2019 (Cohen_FL3_1580)
1808. Glenda Cohen, form letter dated January 8, 2019 (Cohen_FL3_1732)
1809. Patricia Comerford, form letter dated March 1, 2019 (Comerford_FL3_2923)
1810. Richard J. Comiskey, form letter dated January 8, 2019 (Comiskey_FL3_1799)
1811. Denise C. Conroy, form letter dated March 1, 2019 (Conroy_FL3_2432)
1812. Christine Conway, form letter dated January 10, 2019 (Conway_FL3_181)
1813. Maureen Coppinger, form letter dated January 8, 2019 (Coppinger_FL3_1604)
1814. Terence Coppinger, form letter dated January 8, 2019 (Coppinger_FL3_1793)
1815. Ann V. Corbert, form letter dated January 8, 2019 (Corbert_FL3_1709)
1816. William J. Corbett, form letter dated January 8, 2019 (Corbett_FL3_1663)
1817. Kerryann Corbett-Padro, form letter dated March 1, 2019 (Corbett-Padro_FL3_2908)
1818. Ciara P. Cormican, form letter dated January 10, 2019 (Cormican_FL3_226)
1819. Kerry Cormican, form letter dated January 10, 2019 (Cormican_FL3_233)
1820. Jeannette Cornell, form letter dated January 8, 2019 (Cornell_FL3_1764)
1821. Eileen Cornig, form letter dated January 8, 2019 (Cornig_FL3_1680)
1822. Matt Corrigan, form letter dated January 10, 2019 (Corrigan_FL3_241)
1823. Amy Corrigan, form letter dated January 8, 2019 (Corrigan_FL3_1605)
1824. John R. Cortapasso, form letter dated January 8, 2019 (Cortapasso_FL3_1656)
1825. John T. Crawford, form letter dated March 1, 2019 (Crawford_FL3_2458)
1826. Sarah Crenshaw, form letter dated January 10, 2019 (Crenshaw_FL3_274)
1827. Theresa Criscitelli, form letter dated March 1, 2019 (Criscitelli_FL3_2897)
1828. Tomas Crurba, form letter dated January 10, 2019 (Crurba_FL3_278)
1829. Laura Cullinan, form letter dated January 23, 2019 (Cullinan_FL3_2120)
1830. Raymond Cullinan, form letter dated January 23, 2019 (Cullinan_FL3_2121)
| 1831. | Laura Cullinan, form letter dated March 1, 2019 (Cullinan_FL3_3009) |
| 1832. | Raymond Cullinan, form letter dated March 1, 2019 (Cullinan_FL3_3010) |
| 1833. | Michael Culotta, form letter dated January 8, 2019 (Culotta_FL3_1640) |
| 1834. | Dierdre Cunningham, form letter dated January 10, 2019 (Cunningham_FL3_166) |
| 1835. | Neil Cunningham, form letter dated January 10, 2019 (Cunningham_FL3_167) |
| 1836. | Barbara Cunningham, form letter dated January 8, 2019 (Cunningham_FL3_1698) |
| 1837. | Susan D'Amico, form letter dated January 8, 2019 (D'Amico_FL3_1677) |
| 1838. | Frank D'Amico, form letter dated January 8, 2019 (D'Amico_FL3_1678) |
| 1839. | Nancy E. Daileader, form letter dated January 8, 2019 (Daileader_FL3_1724) |
| 1840. | Cynthia Damato, form letter dated January 10, 2019 (Damato_FL3_254) |
| 1841. | Alma Daouaou, form letter dated January 8, 2019 (Daouaou_FL3_1662) |
| 1842. | Abdelilah Daouaou, form letter dated January 8, 2019 (Daouaou_FL3_1774) |
| 1843. | Eileen Davidson, form letter dated March 1, 2019 (Davidson_FL3_2940) |
| 1844. | Patricia Dean, form letter dated January 8, 2019 (Dean_FL3_1705) |
| 1845. | Diane Delaney, form letter dated March 1, 2019 (Delaney_FL3_2925) |
| 1846. | Lee Delia, form letter dated January 10, 2019 (Delia_FL3_253) |
| 1847. | Michael DellaCorte, form letter dated January 10, 2019 (DellaCorte_FL3_240) |
| 1848. | Denise DellaCorte, form letter dated January 8, 2019 (DellaCorte_FL3_1657) |
| 1849. | Anne M. DelPrete, form letter dated January 10, 2019 (DelPrete_FL3_250) |
| 1850. | Michael J. Derby, form letter dated January 8, 2019 (Derby_FL3_1596) |
| 1851. | Eileen Desote, form letter dated March 1, 2019 (Desote_FL3_2903) |
| 1852. | Petrina DiGange, form letter dated January 10, 2019 (DiGange_FL3_280) |
| 1853. | Andrea DiLorenzo, form letter dated January 8, 2019 (DiLorenzo_FL3_1801) |
| 1854. | Elizabeth DiMeo, form letter dated March 1, 2019 (DiMeo_FL3_2991) |
| 1855. | Douglas DiMeo, form letter dated March 1, 2019 (DiMeo_FL3_2994) |
| 1856. | Jeffrey DiMeo, form letter dated March 1, 2019 (DiMeo_FL3_2997) |
| 1857. | Lucille DiMola, form letter dated March 1, 2019 (DiMola_FL3_2918) |
| 1858. | Theresa DiPippa, form letter dated January 10, 2019 (DiPippa_FL3_313) |
| 1859. | Eileen Dispensa, form letter dated March 1, 2019 (Dispensa_FL3_3031) |
| 1860. | Steve Dispensa, form letter dated March 1, 2019 (Dispensa_FL3_3040) |
| 1861. | James Dodson, form letter dated January 8, 2019 (Dodson_FL3_1666) |
| 1862. | Eugene Dolan, form letter dated January 10, 2019 (Dolan_FL3_272) |
| 1863. | Sofia Dolan, form letter dated January 10, 2019 (Dolan_FL3_273) |
| 1864. | Diane Dommermuth, form letter dated January 10, 2019 (Dommermuth_FL3_163) |
| 1865. | Joan Donnelly, form letter dated January 10, 2019 (Donnelly_FL3_156) |
| 1866. | J. Donnelly, form letter dated January 8, 2019 (Donnelly_FL3_1582) |
| 1867. | Fran Donnelly, form letter dated January 8, 2019 (Donnelly_FL3_1583) |
| 1868. | Gerard Donoghue, form letter dated March 1, 2019 (Donoghue_FL3_2737) |
| 1869. | Elaine Doster, form letter dated March 1, 2019 (Doster_FL3_2497) |
| 1870. | Vincent Dragone, form letter dated January 10, 2019 (Dragone_FL3_265) |
| 1871. | Anna Dragone, form letter dated January 10, 2019 (Dragone_FL3_266) |
| 1872. | Theresa Dragone-Meegan, form letter dated January 10, 2019 (Dragone-Meegan_FL3_270) |
| 1873. | Patricia Dreyer, form letter dated January 8, 2019 (Dreyer_FL3_1767) |
| 1874. | Thomas Dreyer, form letter dated January 8, 2019 (Dreyer_FL3_1770) |
| 1875. | Amy Drogalis, form letter dated March 1, 2019 (Drogalis_FL3_3013) |
| 1876. | Monica Drogalis, form letter dated March 1, 2019 (Drogalis_FL3_3014) |
| 1877. | John Drogalis, form letter dated March 1, 2019 (Drogalis_FL3_3019) |
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

1878. Patricia Drogalis, form letter dated March 1, 2019 (Drogalis_FL3_3020)
1879. Kevin Dunne, form letter dated March 1, 2019 (Dunne_FL3_2913)
1880. Danielle Dunne, form letter dated March 1, 2019 (Dunne_FL3_2914)
1881. Nancy Eisenhuth, form letter dated March 1, 2019 (Eisenhuth_FL3_2738)
1882. Patricia D Eren, form letter dated January 10, 2019 (Eren_FL3_159)
1883. Helene Esposito, form letter dated January 22, 2019 (Esposito_FL3_1818)
1884. Francis Eusebio, form letter dated January 10, 2019 (Eusebio_FL3_203)
1885. Paraskevi Evola, form letter dated January 10, 2019 (Evola_FL3_248)
1886. Kenneth B. Fairben, form letter dated January 8, 2019 (Fairben_FL3_1655)
1887. Suzanne Falth, form letter dated January 10, 2019 (Falth_FL3_169)
1888. Christine M. Farrell, form letter dated January 10, 2019 (Farrell_FL3_295)
1889. James C. Farrell, form letter dated January 8, 2019 (Farrell_FL3_1734)
1890. Christine M. Farrell, form letter dated January 8, 2019 (Farrell_FL3_1735)
1891. Stephanie Fattorini, form letter dated January 8, 2019 (Fattorini_FL3_1728)
1892. Ann Faughnan, form letter dated March 1, 2019 (Faughnan_FL3_2905)
1893. Peggy Fenton, form letter dated January 10, 2019 (Fenton_FL3_187)
1894. Peter J. Fenton, form letter dated January 8, 2019 (Fenton_FL3_1578)
1895. Debra Fenton, form letter dated January 8, 2019 (Fenton_FL3_1586)
1896. David Fernandez, form letter dated January 8, 2019 (Fernandez_FL3_1668)
1897. Susan M. Filshie, form letter dated January 10, 2019 (Filshie_FL3_219)
1898. John Filshie, form letter dated January 10, 2019 (Filshie_FL3_220)
1899. Lea Fisher, form letter dated March 1, 2019 (Fisher_FL3_2964)
1900. Patrick Fitzgerald, form letter dated January 10, 2019 (Fitzgerald_FL3_153)
1901. Jennifer Fitzgerald, form letter dated January 8, 2019 (Fitzgerald_FL3_1592)
1902. Kathryn Flood, form letter dated January 10, 2019 (Flood_FL3_284)
1903. Kathryn Flood, form letter dated January 14, 2019 (Flood_FL3_316)
1904. Kevin J. Flood, form letter dated January 8, 2019 (Flood_FL3_1674)
1905. Kristin Flood, form letter dated January 8, 2019 (Flood_FL3_1763)
1906. Susan Fox, form letter dated March 1, 2019 (Fox_FL3_3006)
1907. Kenneth Fox, form letter dated March 1, 2019 (Fox_FL3_3007)
1908. Lisa Foy, form letter dated January 10, 2019 (Foy_FL3_212)
1909. Stephen Foy, form letter dated January 10, 2019 (Foy_FL3_213)
1910. Elvira Francischelli, form letter dated March 1, 2019 (Francischelli_FL3_2950)
1911. Louis Francischelli, form letter dated March 1, 2019 (Francischelli_FL3_2954)
1912. R. Friedman, form letter dated January 10, 2019 (Friedman_FB3_196)
1913. Mabel M. Galanek, form letter dated January 8, 2019 (Galanek_FL3_1738)
1914. Catherine Galanek, form letter dated March 1, 2019 (Galanek_FL3_2896)
1915. Mellisa Gallagher, form letter dated January 10, 2019 (Gallagher_FL3_259)
1916. Gary Gallelli, form letter dated January 10, 2019 (Gallelli_FL3_260)
1917. Joseph Gambino, form letter dated January 8, 2019 (Gambino_FL3_1711)
1918. Louis Gammauato, form letter dated January 8, 2019 (Gammauato_FL3_1794)
1919. Donna Gammauato, form letter dated January 8, 2019 (Gammauato_FL3_1797)
1920. Robert Ganun, form letter dated January 8, 2019 (Ganun_FL3_1779)
1921. Patricia Ganun, form letter dated January 8, 2019 (Ganun_FL3_1780)
1922. Rosa Garcia, form letter dated March 1, 2019 (Garcia_FL3_2963)
1923. George Garcia, form letter dated March 1, 2019 (Garcia_FL3_2966)
1924. Joseph M. Gargiulo, form letter dated January 8, 2019 (Gargiulo_FL3_1739)
1925. Gilda Gately, form letter dated March 1, 2019 (Gately_FL3_3000)
Chapter 22: Response to Public Comments

1926. Matthew Gately, form letter dated March 1, 2019 (Gately_FL3_3008)
1927. Francis Gehrling, form letter dated March 1, 2019 (Gehrling_FL3_2446)
1928. Frederick Gehrling, form letter dated March 1, 2019 (Gehrling_FL3_2451)
1929. Edward W. Geraghty, form letter dated January 8, 2019 (Geraghty_FL3_1672)
1930. Noreen Gill, form letter dated January 10, 2019 (Gill_FL3_152)
1931. James Gill, form letter dated January 23, 2019 (Gill_FL3_2117)
1932. Jennifer Gill, form letter dated January 23, 2019 (Gill_FL3_2118)
1933. Kaitlyn E. Gill, form letter dated January 23, 2019 (Gill_FL3_2119)
1934. James Gill, form letter dated March 1, 2019 (Gill_FL3_2999)
1935. Jennifer Gill, form letter dated March 1, 2019 (Gill_FL3_3003)
1936. Kaitlyn Gill, form letter dated March 1, 2019 (Gill_FL3_3004)
1937. Gregory Girardi, form letter dated January 10, 2019 (Girardi_FL3_276)
1938. Christina Girardi, form letter dated January 10, 2019 (Girardi_FL3_277)
1939. Gregory Girardi, form letter dated January 10, 2019 (Girardi_FL3_287)
1940. Angela Girardi, form letter dated January 10, 2019 (Girardi_FL3_289)
1941. Elizabeth Glaser, form letter dated January 10, 2019 (Glaser_FL3_297)
1942. Sean Glennon, form letter dated January 8, 2019 (Glennon_FL3_1785)
1943. Maureen Glennon Hieb, form letter dated January 8, 2019 (Glennon_Hieb_FL3_1642)
1944. Lorraine Goodis, form letter dated January 10, 2019 (Goodis_FL3_216)
1945. P. Gormley, form letter dated January 8, 2019 (Gormley_FL3_1607)
1946. Joseph Gormley, form letter dated January 23, 2019 (Gormley_FL3_2113)
1947. Kevin Gormley, form letter dated January 23, 2019 (Gormley_FL3_2114)
1948. Patricia Gormley, form letter dated March 1, 2019 (Gormley_FL3_2990)
1949. Joseph Gormley, form letter dated March 1, 2019 (Gormley_FL3_2993)
1950. Kevin Gormley, form letter dated March 1, 2019 (Gormley_FL3_2995)
1951. Walter Gosden, form letter dated January 14, 2019 (Gosden_FL3_317)
1952. Judith Greene, form letter dated January 8, 2019 (Greene_FL3_1791)
1953. Carol Gregosir, form letter dated March 1, 2019 (Gregosir_FL3_2934)
1954. Michael Grillo, form letter dated March 1, 2019 (Grillo_FL3_2935)
1955. Judith Grillo, form letter dated March 1, 2019 (Grillo_FL3_2937)
1956. Anne Groshans, form letter dated January 10, 2019 (Groshans_FL3_211)
1957. Nancy Gross, form letter dated January 8, 2019 (Gross_FL3_1784)
1958. A. Guadagno, form letter dated January 10, 2019 (Guadagno_FL3_206)
1959. Catherine Guadagno, form letter dated January 10, 2019 (Guadagno_FL3_210)
1960. Linda Guilmette, form letter dated January 8, 2019 (Guilmette_FL3_058)
1961. Linda Guilmette, form letter dated January 8, 2019 (Guilmette_FL3_1809)
1962. Francis Gunther, form letter dated January 8, 2019 (Gunther_FL3_1722)
1964. James Handlin, form letter dated January 11, 2019 (Handlin_FL3_320)
1965. James Handlin, form letter dated January 8, 2019 (Handlin_FL3_1603)
1966. Mary Harkins, form letter dated January 8, 2019 (Harkins_FL3_1733)
1967. Crystal Harris, form letter dated March 1, 2019 (Harris_FL3_2898)
1968. Deborah Hastings, form letter dated January 8, 2019 (Hastings_FL3_1807)
1969. John Haugh, form letter dated March 1, 2019 (Haugh_FL3_2972)
1970. Josephine Haugh, form letter dated March 1, 2019 (Haugh_FL3_2973)
1971. Douglas J. Hayden, form letter dated January 8, 2019 (Hayden_FL3_1765)
1972. Una Hayden, form letter dated January 8, 2019 (Hayden_FL3_1781)
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

1974. William Hecker, form letter dated March 1, 2019 (Hecker_FL3_2952)
1975. Peggy Anne Hecker, form letter dated March 1, 2019 (Hecker_FL3_2957)
1976. Evelyn M. Hegler, form letter dated March 1, 2019 (Hegler_FL3_2428)
1979. Lauren Henderson, form letter dated March 1, 2019 (Henderson_FL3_2996)
1980. Dan Henderson, form letter dated March 1, 2019 (Henderson_FL3_2998)
1981. Aileen Hennelly, form letter dated January 10, 2019 (Hennelly_FL3_217)
1982. Lynn Henry, form letter dated January 8, 2019 (Henry_FL3_1661)
1983. Pat Hill, form letter dated March 1, 2019 (Hill_FL3_2490)
1984. Robert Hoey, form letter dated March 1, 2019 (Hoey_FL3_3048)
1986. Suzanne Huber, form letter dated January 8, 2019 (Huber_FL3_1718)
1988. Shanthy Hughes, form letter dated January 10, 2019 (Hughes_FL3_200)
1989. John Hughes, form letter dated January 8, 2019 (Hughes_FL3_1615)
1990. Claire Hughes, form letter dated January 8, 2019 (Hughes_FL3_1616)
1991. John M. Hughes, form letter dated January 8, 2019 (Hughes_FL3_1623)
1992. Winifred B. Hughes, form letter dated January 8, 2019 (Hughes_FL3_1624)
1993. Heather Hughes, form letter dated January 8, 2019 (Hughes_FL3_1635)
1994. Daniel Hughes, form letter dated January 8, 2019 (Hughes_FL3_1751)
1996. Patricia Clements Jaquay, form letter dated March 1, 2019 (Jaquay_FL3_3037)
1997. Mary R. Kane, form letter dated January 10, 2019 (Kane_FL3_299)
1998. James Kane, form letter dated January 8, 2019 (Kane_FL3_1699)
2002. Frances Kellner, form letter dated January 8, 2019 (Kellner_FL3_1627)
2004. Margaret Kelly, form letter dated January 8, 2019 (Kelly_FL3_1617)
2005. James Kelly, form letter dated January 8, 2019 (Kelly_FL3_1618)
2006. Jessica Kelly-Brown, form letter dated January 8, 2019 (Kelly-Brown_FL3_1653)
2007. Patrick M. Kenneally, form letter dated January 8, 2019 (Kenneally_FL3_1759)
2009. Ellen Kenneally, form letter dated March 1, 2019 (Kenneally_FL3_2470)
2010. Kevin R. Kennedy, form letter dated January 8, 2019 (Kennedy_FL3_1746)
2011. Amy Kerrigan, form letter dated January 10, 2019 (Kerrigan_FL3_269)
2013. Admen Khan, form letter dated January 10, 2019 (Khan_FL3_171)
2014. Farooq Khawaja, form letter dated January 8, 2019 (Khawaja_FL3_1773)
2015. Marylou King, form letter dated January 8, 2019 (King_FL3_1694)
2016. Patricia Kirby, form letter dated January 8, 2019 (Kirby_FL3_1639)
2017. Catherine Kirchhofer, form letter dated March 1, 2019 (Kirchhofer_FL3_2977)
2018. Kevin Kiss, form letter dated January 8, 2019 (Kiss_FL3_1725)
2019. Alexander M. Koester, form letter dated March 1, 2019 (Koester_FL3_2523)
2020. Christine Kosinski, form letter dated March 1, 2019 (Kosinski_FL3_2959)
2021. Andrew Kosinski, form letter dated March 1, 2019 (Kosinski_FL3_2961)
Chapter 22: Response to Public Comments

2022. Emily Kruzynski, form letter dated January 8, 2019 (Kruzynski_FL3_1591)
2023. Anthony Kruzynski, form letter dated January 8, 2019 (Kruzynski_FL3_1594)
2024. Thomas Kubler, form letter dated March 1, 2019 (Kubler_FL3_3032)
2025. Dana Laffey, form letter dated January 8, 2019 (Laffey_FL3_1632)
2026. Kathleen Lally, form letter dated January 8, 2019 (Lally_FL3_1771)
2027. Robert LaMarche, form letter dated January 8, 2019 (LaMarche_FL3_1719)
2028. Darlene Lanza, form letter dated January 8, 2019 (Lanza_FL3_1602)
2029. Frances Lanzetta, form letter dated January 10, 2019 (Lanzetta_FL3_312)
2030. Lisa Lanzetta, form letter dated January 8, 2019 (Lanzetta_FL3_1579)
2031. Frances Lanzetta, form letter dated January 8, 2019 (Lanzetta_FL3_1601)
2032. Elizabeth Lauria, form letter dated January 10, 2019 (Lauria_FL3_208)
2033. Maureen Laut, form letter dated March 1, 2019 (Laut_FL3_2915)
2034. Lauren Lavoie, form letter dated January 8, 2019 (Lavoie_FL3_1782)
2035. Patricia Lennon, form letter dated March 1, 2019 (Lennon_FL3_3049)
2036. Meredith Liberatore, form letter dated January 10, 2019 (Liberatore_FL3_298)
2037. Elaine M. Licari, form letter dated January 8, 2019 (Licari_FL3_1775)
2038. V Licari, form letter dated March 1, 2019 (Licari_FL3_2938)
2039. Carol Lipsky, form letter dated January 10, 2019 (Lipsky_FL3_305)
2040. Maria Locascio, form letter dated January 8, 2019 (Locascio_FL3_1737)
2041. Joseph Loftus, form letter dated March 1, 2019 (Loftus_FL3_2943)
2042. Pia Loftus, form letter dated March 1, 2019 (Loftus_FL3_2945)
2043. Krista Longobardi, form letter dated January 10, 2019 (Longobardi_FL3_155)
2044. Michael Longobardi, form letter dated January 8, 2019 (Longobardi_FL3_1636)
2045. Denise Longobardi, form letter dated January 8, 2019 (Longobardi_FL3_1684)
2046. M Lovari, form letter dated January 10, 2019 (Lovari_FL3_303)
2047. Rose Lozano, form letter dated January 10, 2019 (Lozano_FL3_244)
2048. Lorraine Lubichich, form letter dated January 10, 2019 (Lubichich_FL3_283)
2049. Paul Lubichich, form letter dated January 8, 2019 (Lubichich_FL3_1706)
2050. Peggy E. Lyons, form letter dated January 8, 2019 (Lyons_FL3_1766)
2051. Margaret MacDonald, form letter dated January 8, 2019 (MacDonald_FL3_1595)
2052. James E. MacDonald, form letter dated January 8, 2019 (MacDonald_FL3_1597)
2053. Theresa MacDonald, form letter dated January 8, 2019 (MacDonald_FL3_1637)
2054. Maureen MacDonald, form letter dated January 8, 2019 (MacDonald_FL3_1790)
2055. T Macko, form letter dated January 10, 2019 (Macko_FL3_304)
2056. Victoria Maclean, form letter dated January 10, 2019 (Maclean_FL3_218)
2057. Valerie Magee, form letter dated January 10, 2019 (Magee_FL3_263)
2058. Diane Malone, form letter dated January 8, 2019 (Malone_FL3_1588)
2059. Jim Malone, form letter dated January 8, 2019 (Malone_FL3_1589)
2060. Lorcan Malone, form letter dated January 8, 2019 (Malone_FL3_1631)
2061. Chris Mancz, form letter dated March 1, 2019 (Mancz_FL3_3001)
2062. Jill Manning, form letter dated January 10, 2019 (Manning_FL3_168)
2063. Laurel Manning, form letter dated January 10, 2019 (Manning_FL3_207)
2064. Maggie Mansfield, form letter dated January 8, 2019 (Mansfield_FL3_059)
2065. Thomas Mansfield, form letter dated January 8, 2019 (Mansfield_FL3_060)
2066. Maureen Mansfield, form letter dated January 8, 2019 (Mansfield_FL3_061)
2067. Maggie Mansfield, form letter dated January 8, 2019 (Mansfield_FL3_1811)
2068. Thomas Mansfield, form letter dated January 8, 2019 (Mansfield_FL3_1812)
2069. Maureen O'Connor Mansfield, form letter dated January 8, 2019 (Mansfield_FL3_1813)
Lenore Marchiano, form letter dated January 8, 2019 (Marchiano_FL3_1789)
Janet Marino, form letter dated March 1, 2019 (Marino_FL3_2436)
Brigid Marmorowski, form letter dated January 8, 2019 (Marmorowski_FL3_1665)
Patricia Martinez, form letter dated January 8, 2019 (Martinez_FL3_1671)
Edward Martinez, form letter dated March 1, 2019 (Martinez_FL3_2962)
Sally Martucci, form letter dated January 10, 2019 (Martucci_FL3_197)
Robert Martucci, form letter dated January 10, 2019 (Martucci_FL3_198)
Katherine Mastendrea, form letter dated March 1, 2019 (Mastendrea_FL3_2899)
Mary Jane Mastrella, form letter dated January 8, 2019 (Mastrella_FL3_1749)
Michele Mayo, form letter dated January 10, 2019 (Mayo_FL3_186)
Melissa Mazzocco, form letter dated March 1, 2019 (Mazzocco_FL3_2739)
Frank & Peg McCaffrey, form letter dated January 8, 2019 (McCaffrey_FL3_1710)
Karen McCarren, form letter dated January 10, 2019 (McCarren_FL3_201)
Brian McClinstock, form letter dated January 8, 2019 (McClinstock_FL3_1633)
Heather McClinstock, form letter dated January 8, 2019 (McClinstock_FL3_1651)
Patricia McCormack, form letter dated January 10, 2019 (McCormack_FL3_151)
Dana McCoy, form letter dated January 10, 2019 (McCoy_FL3_246)
Anne Marie McGeever, form letter dated January 8, 2019 (McGeever_FL3_1723)
Anne Marie McGeever, form letter dated March 1, 2019 (McGeever_FL3_3026)
Finola McGovern, form letter dated January 10, 2019 (McGovern_FL3_275)
Phyllis McGovern, form letter dated January 8, 2019 (McGovern_FL3_1634)
Leah McGovern, form letter dated January 8, 2019 (McGovern_FL3_1703)
Roger McGovern, form letter dated January 8, 2019 (McGovern_FL3_1704)
Brian McGovern, form letter dated January 8, 2019 (McGovern_FL3_1776)
G. McGowan, form letter dated January 8, 2019 (McGowan_FL3_1648)
Marian McGrane, form letter dated January 10, 2019 (McGrane_FL3_160)
Matthew McGreever, form letter dated March 1, 2019 (McGreever_FL3_3025)
Angela McGuire, form letter dated January 8, 2019 (McGuire_FL3_1638)
James McGuire, form letter dated January 8, 2019 (McGuire_FL3_1647)
Brian McHale, form letter dated January 8, 2019 (McHale_FL3_1679)
James McInerney, form letter dated January 8, 2019 (McInerney_FL3_1729)
James McLaughlin, form letter dated March 1, 2019 (McLaughlin_FL3_2956)
Michael Meegan, form letter dated January 10, 2019 (Meegan_FL3_271)
Thomas Merle, form letter dated January 8, 2019 (Merle_FL3_1755)
Russell Mesnick, form letter dated January 8, 2019 (Mesnick_FL3_1700)
Kyle Meyfohrt, form letter dated January 8, 2019 (Meyfohrt_FL3_1598)
Kurt Meyfohrt, form letter dated January 8, 2019 (Meyfohrt_FL3_1599)
Deborah Meyfohrt, form letter dated January 8, 2019 (Meyfohrt_FL3_1600)
Donald Mezzett, form letter dated January 8, 2019 (Mezzett_FL3_1769)
Mia Minogue, form letter dated January 10, 2019 (Minogue_FL3_267)
Deirdre Moore, form letter dated March 1, 2019 (Moore_FL3_2910)
Shannon Moroney, form letter dated January 10, 2019 (Moroney_FL3_221)
Thomas Moroney, form letter dated January 10, 2019 (Moroney_FL3_281)
Kathleen Morrongello, form letter dated January 8, 2019 (Morrongello_FL3_1692)
Asmaa Mounir, form letter dated January 10, 2019 (Mounir_FL3_189)
Neil Mulhall, form letter dated January 8, 2019 (Mulhall_FL3_1687)
John Mulhall, form letter dated January 8, 2019 (Mulhall_FL3_1741)
Kathleen Mulhall, form letter dated January 8, 2019 (Mulhall_FL3_1747)
Chapter 22: Response to Public Comments

2118. Marc Mullen, form letter dated January 8, 2019 (Mullen_FL3_1675)
2119. Alfred J. Mullen, form letter dated January 8, 2019 (Mullen_FL3_1760)
2120. Judy Muller, form letter dated January 10, 2019 (Muller_FL3_252)
2121. Kathy Muller, form letter dated January 8, 2019 (Muller_FL3_1654)
2122. Elisabeth Muller, form letter dated January 8, 2019 (Muller_FL3_1744)
2123. Sheila Mulligan, form letter dated January 10, 2019 (Mulligan_FL3_307)
2124. Paul Muraski, form letter dated March 1, 2019 (Muraski_FL3_2420)
2125. Mike Murphy, form letter dated January 10, 2019 (Murphy_FL3_257)
2126. Camille E. Murphy, form letter dated January 10, 2019 (Murphy_FL3_314)
2127. Daniel E. Murphy, form letter dated January 8, 2019 (Murphy_FL3_1690)
2128. Nancy Muscat, form letter dated January 10, 2019 (Muscat_FL3_191)
2129. Christina Nardella, form letter dated January 10, 2019 (Nardella_FL3_247)
2130. Marianne Nardella, form letter dated January 8, 2019 (Nardella_FL3_1630)
2131. Paul Naronis, form letter dated March 1, 2019 (Naronis_FL3_2924)
2132. Stephanie Naronis, form letter dated March 1, 2019 (Naronis_FL3_2942)
2133. B. Naughton, form letter dated January 8, 2019 (Naughton_FL3_1742)
2135. Dina Nelson, form letter dated January 8, 2019 (Nelson_FL3_1620)
2137. Vickey Niles, form letter dated January 10, 2019 (Niles_FL3_255)
2138. Anthony Norcia, form letter dated March 1, 2019 (Norcia_FL3_2983)
2139. Tara Nugent, form letter dated January 10, 2019 (Nugent_FL3_251)
2140. TeriAnn Nummey, form letter dated March 1, 2019 (Nummey_FL3_2944)
2141. MK O'Brien, form letter dated January 10, 2019 (O'Brien_FL3_173)
2142. Russell O'Brien, form letter dated January 8, 2019 (O'Brien_FL3_1748)
2143. Anne O'Brien, form letter dated March 1, 2019 (O'Brien_FL3_2907)
2145. Diane O'Donnell, form letter dated January 10, 2019 (O'Donnell_FL3_174)
2146. Mary O'Donoghue, form letter dated January 10, 2019 (O'Donoghue_FL3_293)
2147. John O'Donoghue, form letter dated January 10, 2019 (O'Donoghue_FL3_294)
2148. Jaclyn O'Donohue, form letter dated January 10, 2019 (O'Donohue_FL3_185)
2149. M. O'Donohue, form letter dated January 10, 2019 (O'Donohue_FL3_1712)
2150. R O'Donohue, form letter dated January 8, 2019 (O'Donohue_FL3_1714)
2151. Maria O'Grady, form letter dated January 8, 2019 (O'Grady_FL3_1716)
2152. Joseph O'Grady, form letter dated January 8, 2019 (O'Grady_FL3_1717)
2153. Margaret O'Keefe, form letter dated January 10, 2019 (O'Keefe_FL3_180)
2154. Melissa O'Leary, form letter dated January 10, 2019 (O'Leary_FL3_190)
2155. Bernard O'Malley, form letter dated January 23, 2019 (O'Malley_FL3_2122)
2156. Mary Jane O'Malley, form letter dated January 23, 2019 (O'Malley_FL3_2123)
2157. Dian Mills O'Reilly, form letter dated January 8, 2019 (O'Reilly_FL3_1608)
2158. Siobhan O'Reilly, form letter dated January 10, 2019 (O'Reilly_FL3_209)
2159. Anne Marie Olton, form letter dated January 10, 2019 (Olton_FL3_184)
2160. Maria Olynec, form letter dated January 10, 2019 (Olynec_FL3_204)
2161. Bernard O'Malley, form letter dated March 1, 2019 (O'Malley_FL3_3011)
2162. Mary Jane O'Malley, form letter dated March 1, 2019 (O'Malley_FL3_3015)
2163. Nicholas O'Malley, form letter dated March 1, 2019 (O'Malley_FL3_3017)
2164. Christine Orkwis, form letter dated January 10, 2019 (Orkwis_FL3_256)
2165. Maria E. Ortega, form letter dated January 10, 2019 (Ortega_FL3_188)
Anna Owens, form letter dated March 1, 2019 (Owens_FL3_2988)
Tara Palacios, form letter dated March 1, 2019 (Palacios_FL3_2911)
Emilia Palamara, form letter dated March 1, 2019 (Palamara_FL3_2416)
John Paley, form letter dated January 8, 2019 (Paley_FL3_1713)
Laura Pape, form letter dated January 10, 2019 (Pape_FL3_182)
Angela Pappas, form letter dated March 1, 2019 (Pappas_FL3_2906)
Ralph Paterno, form letter dated January 8, 2019 (Paterno_FL3_1689)
Terry Paterno, form letter dated January 8, 2019 (Paterno_FL3_1756)
Patricia V. Pedley, form letter dated March 1, 2019 (Pedley_FL3_2424)
Kathryn L. Peiser, form letter dated January 8, 2019 (Peiser_FL3_1667)
John Peiser, form letter dated January 8, 2019 (Peiser_FL3_1683)
Rachel Penteck, form letter dated March 1, 2019 (Penteck_FL3_3035)
William Penteck, form letter dated March 1, 2019 (Penteck_FL3_3036)
Kaitlyn Perge, form letter dated January 11, 2019 (Perge_FL3_086)
Danielle Persampree, form letter dated March 1, 2019 (Persampree_FL3_3012)
Joseph Petroso, form letter dated March 1, 2019 (Petroso_FL3_2408)
Neil Petroso, form letter dated March 1, 2019 (Petroso_FL3_2412)
Uliana Petroso, form letter dated March 1, 2019 (Petroso_FL3_2442)
Carl Petroso, form letter dated March 1, 2019 (Petroso_FL3_2516)
Robert Phillips, form letter dated January 8, 2019 (Phillips_FL3_1750)
Julius Picardi, form letter dated January 8, 2019 (Picardi_FL3_1593)
Richard Picciochi, form letter dated January 8, 2019 (Picciochi_FL3_1682)
Teresa Piotrowski, form letter dated March 1, 2019 (Piotrowski_FL3_2503)
Anne Pollack, form letter dated January 8, 2019 (Pollack_FL3_1731)
Virginia Pourakis, form letter dated March 1, 2019 (Pourakis_FL3_3030)
Megan Power, form letter dated January 8, 2019 (Power_FL3_1606)
Daniel Praino, form letter dated January 8, 2019 (Praino_FL3_1768)
Kristine Prestia, form letter dated January 10, 2019 (Prestia_FL3_195)
Christopher Prestia, form letter dated January 8, 2019 (Prestia_FL3_1590)
Laura Puma, form letter dated March 1, 2019 (Puma_FL3_2947)
Brian Puma, form letter dated March 1, 2019 (Puma_FL3_2949)
Kathryn Quaderer, form letter dated January 8, 2019 (Quaderer_FL3_1609)
Lourdes Quijano, form letter dated January 8, 2019 (Quijano_FL3_1629)
Roger Raiford, form letter dated January 8, 2019 (Raiford_FL3_1796)
John Raleigh, form letter dated January 10, 2019 (Raleigh_FL3_222)
Bridget Raleigh, form letter dated January 10, 2019 (Raleigh_FL3_223)
Luise Ranegan, form letter dated January 10, 2019 (Ranegan_FL3_282)
Fran Rasquin, form letter dated January 10, 2019 (Rasquin_FL3_279)
C Rasquin, form letter dated January 10, 2019 (Rasquin_FL3_288)
Janet Reid, form letter dated March 1, 2019 (Reid_FL3_2929)
Elizabeth Reisch, form letter dated January 8, 2019 (Reisch_FL3_1720)
Christine Reisig, form letter dated January 8, 2019 (Reisig_FL3_1685)
Mark Reisig, form letter dated January 8, 2019 (Reisig_FL3_1772)
Amy Richardson, form letter dated January 10, 2019 (Richardson_FL3_236)
Tamara Richardson-Monde, form letter dated March 1, 2019 (Richardson-Monde_FL3_2736)
Lynn Riofrio, form letter dated January 10, 2019 (Riofrio_FL3_177)
Daniel Riordan, form letter dated March 1, 2019 (Riordan_FL3_2462)
2213. Tracey Riordan, form letter dated March 1, 2019 (Riordan_FL3_2466)
2214. Mary Rispoli, form letter dated March 1, 2019 (Rispoli_FL3_2981)
2215. Milagros Rivera, form letter dated March 1, 2019 (Rivera_FL3_2979)
2216. Sharon Rivilli, form letter dated January 10, 2019 (Rivilli_FL3_225)
2217. Frank Rivilli, form letter dated January 10, 2019 (Rivilli_FL3_227)
2218. Janet Rizzo, form letter dated January 10, 2019 (Rizzo_FL3_164)
2219. Donna Roller, form letter dated January 8, 2019 (Roller_FL3_1805)
2220. Michaela Roller, form letter dated January 8, 2019 (Roller_FL3_1806)
2221. Dennis J. Roller, form letter dated January 8, 2019 (Roller_FL3_1808)
2222. Janet Romano Murray, form letter dated January 8, 2019 (Romano Murray_FL3_1721)
2223. Patricia Ronan, form letter dated January 10, 2019 (Ronan_FL3_237)
2224. James Rooney, form letter dated March 1, 2019 (Rooney_FL3_2967)
2225. Azbela Rooney, form letter dated March 1, 2019 (Rooney_FL3_2969)
2226. Paula Rowe, form letter dated January 10, 2019 (Rowe_FL3_290)
2227. Jonathan Rueda, form letter dated March 1, 2019 (Rueda_FL3_2931)
2228. M. Ruscica, form letter dated January 8, 2019 (Ruscica_FL3_1757)
2229. Kathleen M. Ryan, form letter dated January 10, 2019 (Ryan_FL3_245)
2230. Michelle Ryan, form letter dated January 8, 2019 (Ryan_FL3_1610)
2231. Sundas Salman, form letter dated January 10, 2019 (Salman_FL3_175)
2232. Christopher Salogub, form letter dated January 8, 2019 (Salogub_FL3_1625)
2233. Allen Sankovitch, form letter dated January 10, 2019 (Sankovitch_FL3_170)
2234. Anne Marie Santangelo, form letter dated January 10, 2019 (Santangelo_FL3_165)
2235. Vito Santoruo, form letter dated January 10, 2019 (Santoruo_FL3_238)
2236. Daisy Santoruo, form letter dated January 10, 2019 (Santoruo_FL3_239)
2237. Elizabeth Santos, form letter dated January 10, 2019 (Santos_FL3_202)
2238. Eugena & Robert Sarro, form letter dated January 8, 2019 (Sarro_FL3_1669)
2239. Linda Sartini, form letter dated March 1, 2019 (Sartini_FL3_2901)
2240. Robert M. Savage, form letter dated January 8, 2019 (Savage_FL3_1646)
2241. Michael Saville, form letter dated January 14, 2019 (Saville_FL3_315)
2242. Thomas Saville, form letter dated January 11, 2019 (Saville_FL3_319)
2243. Deborah Sawicho, form letter dated January 8, 2019 (Sawicho_FL3_1697)
2244. Margaret Schlecht, form letter dated January 10, 2019 (Schlecht_FL3_285)
2245. Kenneth Schlechter, form letter dated January 10, 2019 (Schlechter_FL3_286)
2246. William Schneider, form letter dated March 1, 2019 (Schneider_FL3_2916)
2247. William Schneider, form letter dated March 1, 2019 (Schneider_FL3_2939)
2248. Michelle Schneider, form letter dated March 1, 2019 (Schneider_FL3_3018)
2249. Evelyn Schultz, form letter dated January 10, 2019 (Schultz_FL3_150)
2250. Carol Scime-Raiford, form letter dated January 8, 2019 (Scime-Raiford_FL3_1795)
2251. Amy Sebber, form letter dated January 10, 2019 (Sebber_FL3_306)
2252. Joe Serra, form letter dated January 8, 2019 (Serra_FL3_1650)
2253. Steven Settele, form letter dated January 8, 2019 (Settele_FL3_1691)
2254. Gino Settele, form letter dated January 8, 2019 (Settele_FL3_1754)
2255. Amy Sexton, form letter dated January 10, 2019 (Sexton_FL3_224)
2256. Matthew Sexton, form letter dated January 8, 2019 (Sexton_FL3_1641)
2257. John Sexton, form letter dated January 8, 2019 (Sexton_FL3_1743)
2258. Kathleen P. Shaw, form letter dated January 8, 2019 (Shaw_FL3_1736)
2259. Greg Shevlin, form letter dated March 1, 2019 (Shevlin_FL3_2989)
2260. Peter Shevlin, form letter dated March 1, 2019 (Shevlin_FL3_2992)
2261. Nora Shevlin, form letter dated March 1, 2019 (Shevlin_FL3_3024)
2262. Terry Sica, form letter dated January 10, 2019 (Sica_FL3_199)
2263. Thomas Sigismonti, form letter dated January 8, 2019 (Sigismonti_FL3_1652)
2264. Lisa Sindoni, form letter dated January 18, 2019 (Sindoni_FL3_1817)
2265. Alex Slavin, form letter dated March 1, 2019 (Slavin_FL3_2951)
2266. Timothy Slavin, form letter dated March 1, 2019 (Slavin_FL3_3046)
2267. Stacy Slavin, form letter dated March 1, 2019 (Slavin_FL3_3047)
2268. Siobhan Smith, form letter dated January 10, 2019 (Smith_FL3_301)
2269. Thomas G. Smith, form letter dated January 8, 2019 (Smith_FL3_1778)
2270. Shiv Sohan, form letter dated January 10, 2019 (Sohan_FL3_264)
2271. Anne Soviero, form letter dated March 1, 2019 (Soviero_FL3_3043)
2272. John Speck, form letter dated January 10, 2019 (Speck_FL3_214)
2273. Maggie Speck, form letter dated January 10, 2019 (Speck_FL3_215)
2274. Cheryl Spigonardo, form letter dated January 8, 2019 (Spigonardo_FL3_1613)
2275. Vanessa Spinner, form letter dated January 10, 2019 (Spinner_FL3_161)
2276. Marilyn J. Sprague, form letter dated January 8, 2019 (Sprague_FL3_1701)
2277. Stephen Sprague, form letter dated January 8, 2019 (Sprague_FL3_1702)
2278. Robert Sullivan, form letter dated January 8, 2019 (Sullivan_FL3_1587)
2279. Margaret Sullivan, form letter dated January 8, 2019 (Sullivan_FL3_1622)
2280. Joan Sullivan, form letter dated January 8, 2019 (Sullivan_FL3_1688)
2281. Carolyn Susino, form letter dated March 1, 2019 (Susino_FL3_3005)
2282. Tara Sweeney, form letter dated January 10, 2019 (Sweeney_FL3_192)
2283. Kathy Sweeney, form letter dated January 10, 2019 (Sweeney_FL3_194)
2284. Helena Swierkosz, form letter dated March 1, 2019 (Swierkosz_FL3_2511)
2285. Kathleen Szola, form letter dated March 1, 2019 (Szola_FL3_2976)
2286. Joseph Szola, form letter dated March 1, 2019 (Szola_FL3_2978)
2287. Paul Szymanski, form letter dated January 8, 2019 (Szymanski_FL3_062)
2288. Paul Szymanski, form letter dated January 8, 2019 (Szymanski_FL3_1814)
2289. Theresa Tam, form letter dated March 1, 2019 (Tam_FL3_3021)
2290. Douglas Tam, form letter dated March 1, 2019 (Tam_FL3_3022)
2291. Ingrid S. Taveras, form letter dated January 8, 2019 (Taveras_FL3_1695)
2292. Christopher Tengi, form letter dated March 1, 2019 (Tengi_FL3_3044)
2293. Shannon Tengi, form letter dated March 1, 2019 (Tengi_FL3_3045)
2294. Christine Thorpe, form letter dated January 8, 2019 (Thorpe_FL3_1800)
2295. Laura Tommony, form letter dated January 10, 2019 (Tommony_FL3_243)
2296. George Torres, form letter dated January 10, 2019 (Torres_FL3_302)
2297. Mary Towey, form letter dated January 8, 2019 (Towey_FL3_1643)
2298. Michael Towey, form letter dated January 8, 2019 (Towey_FL3_1752)
2299. Kate Trainor, form letter dated January 8, 2019 (Trainor_FL3_1753)
2300. John T. Trainor, form letter dated January 8, 2019 (Trainor_FL3_1787)
2301. John Trainor, form letter dated March 1, 2019 (Trainor_FL3_3033)
2302. Ann Trainor, form letter dated March 1, 2019 (Trainor_FL3_3034)
2303. Laura J. Trentacoste, form letter dated January 8, 2019 (Trentacoste_FL3_1612)
2304. Marina & Sal Trentacoste, form letter dated January 8, 2019 (Trentacoste_FL3_1649)
2305. Amanda Tripmacher, form letter dated March 1, 2019 (Tripmacher_FL3_2912)
2306. Tim Turmi, form letter dated March 1, 2019 (Turmi_FL3_2403)
2307. Steven Turner, form letter dated March 1, 2019 (Turner_FL3_2909)
2308. Paul Tutrone, form letter dated March 1, 2019 (Tutrone_FL3_2928)
Chapter 22: Response to Public Comments

2309. Catherine Tutrone, form letter dated March 1, 2019 (Tutrone_FL3_2930)
2310. Thomas J. Tweedy, form letter dated January 8, 2019 (Tweedy_FL3_1673)
2311. Roy Tyson, form letter dated January 8, 2019 (Tyson_FL3_1696)
2312. Unknown, form letter dated January 23, 2019 (Unknown_FL3_1819)
2313. Unknown, form letter dated January 23, 2019 (Unknown_FL3_2124)
2314. Unknown, form letter dated March 1, 2019 (Unknown_FL3_2486)
2315. Unknown, form letter dated March 1, 2019 (Unknown_FL3_2507)
2316. Unsigned, form letter dated March 1, 2019 (Unsigned_FL3_2917)
2317. Unsigned, form letter dated March 1, 2019 (Unsigned_FL3_2920)
2318. Unsigned, form letter dated March 1, 2019 (Unsigned_FL3_2921)
2319. Michael Valaner, form letter dated January 10, 2019 (Valaner_FL3_310)
2320. Joe Vale, form letter dated January 8, 2019 (Vale_FL3_1786)
2321. Trisha Vecchiione, form letter dated February 25, 2019 (Vecchieone_FL3_2323)
2322. Joseph Vemtimiglia, form letter dated January 8, 2019 (Vemtimiglia_FL3_1681)
2323. Paul Viggiano, form letter dated March 1, 2019 (Viggiano_FL3_2987)
2324. Christina Vincent, form letter dated January 10, 2019 (Vincent_FL3_172)
2325. Linda Vota, form letter dated January 10, 2019 (Vota_FL3_300)
2326. Matthew P. W, form letter dated January 8, 2019 (W_FL3_1670)
2327. Kathleen Wagner-Tyson, form letter dated January 8, 2019 (Wagner-Tyson_FL3_1676)
2328. Lester F. Wahrenburg, form letter dated January 8, 2019 (Wahrenburg_FL3_1693)
2329. Caroline Ward, form letter dated January 8, 2019 (Ward_FL3_1802)
2330. Thomas Ward, form letter dated January 8, 2019 (Ward_FL3_1803)
2331. Tracy Ward, form letter dated January 8, 2019 (Ward_FL3_1804)
2332. Margaret Weichert, form letter dated January 8, 2019 (Weichert_FL3_1708)
2333. Janet Wille, form letter dated January 10, 2019 (Wille_FL3_157)
2334. Steve Wintors, form letter dated January 8, 2019 (Wintors_FL3_1758)
2335. George Wrange, form letter dated January 8, 2019 (Wrange_FL3_1626)
2336. Linnea Wrange, form letter dated January 8, 2019 (Wrange_FL3_1783)
2337. Elizabeth Wysocki, form letter dated January 10, 2019 (Wysocki_FL3_291)
2338. Richard Wysocki, form letter dated January 10, 2019 (Wysocki_FL3_292)
2339. Herbert Zahner, form letter dated January 8, 2019 (Zahner_FL3_1707)
2340. Kerry Zalepa, form letter dated March 1, 2019 (Zalepa_FL3_2986)
2341. Alfonzo Zampini, form letter dated March 1, 2019 (Zampini_FL3_2933)
2342. Jennifer Zampini, form letter dated March 1, 2019 (Zampini_FL3_2936)
2343. Joseph Zoleta, form letter dated March 1, 2019 (Zoleta_FL3_3041)
2344. Janet Zoleta, form letter dated March 1, 2019 (Zoleta_FL3_3042)

FORM LETTER 4

2345. Jasmine Abel, form letter dated January 14, 2019 (Abel_FL4_790)
2346. John Abel, form letter dated January 22, 2019 (Abel_FL4_1430)
2349. Madelaine Alano, form letter dated January 14, 2019 (Alano_FL4_683)
2350. Karen Anoushian, form letter dated January 22, 2019 (Anoushian_FL4_1342)
2351. Karl Anoushian, form letter dated January 22, 2019 (Anoushian_FL4_1346)
2353. Linda Armstrong, form letter dated January 14, 2019 (Armstrong_FL4_752)
2354. Salvatore Arrigo, form letter dated January 22, 2019 (Arrigo_FL4_1517)
Chapter 22: Response to Public Comments

2403. Kathleen M. Clark, form letter dated March 1, 2019 (Clark_FL4_2483)
2404. Brian P. Cody, form letter dated January 22, 2019 (Cody_FL4_1453)
2405. Glenda Cohen, form letter dated January 22, 2019 (Cohen_FL4_1454)
2406. Richard J. Comiskey, form letter dated January 22, 2019 (Comiskey_FL4_1402)
2407. Winifred Connolly, form letter dated March 1, 2019 (Connolly_FL4_2520)
2408. Denise C. Conroy, form letter dated March 1, 2019 (Conroy_FL4_2429)
2409. Christine Conway, form letter dated January 14, 2019 (Conway_FL4_702)
2410. Terence Coppinger, form letter dated January 22, 2019 (Coppinger_FL4_1396)
2411. Ann V. Corbett, form letter dated January 22, 2019 (Corbett_FL4_1539)
2412. William J. Corbett, form letter dated January 22, 2019 (Corbett_FL4_1542)
2413. Cianan P. Cormican, form letter dated January 14, 2019 (Cormican_FL4_746)
2414. Kerry Cormican, form letter dated January 14, 2019 (Cormican_FL4_753)
2415. Jeannette Cornell, form letter dated January 22, 2019 (Cornell_FL4_1489)
2416. Matt Corrigan, form letter dated January 14, 2019 (Corrigan_FL4_761)
2417. Amy Corrigan, form letter dated January 22, 2019 (Corrigan_FL4_1327)
2418. John R. Cortapasso, form letter dated January 22, 2019 (Cortapasso_FL4_1427)
2419. Patricia & Desmond Costello, form letter dated January 10, 2019 (Costello_FL4_080)
2420. John T. Crawford, form letter dated March 1, 2019 (Crawford_FL4_2459)
2421. Tomas Crurba, form letter dated January 14, 2019 (Crurba_FL4_799)
2422. Laura Cullinan, form letter dated January 23, 2019 (Cullinan_FL4_1575)
2423. Raymond Cullinan, form letter dated January 23, 2019 (Cullinan_FL4_1576)
2424. Michael Culotta, form letter dated January 22, 2019 (Culotta_FL4_1510)
2425. Deirdre Cunningham, form letter dated January 14, 2019 (Cunningham_FL4_687)
2426. Neil Cunningham, form letter dated January 14, 2019 (Cunningham_FL4_688)
2427. Barbara Cunningham, form letter dated January 22, 2019 (Cunningham_FL4_1528)
2428. Susan D'Amico, form letter dated January 22, 2019 (D'Amico_FL4_1408)
2429. Frank D'Amico, form letter dated January 22, 2019 (D'Amico_FL4_1409)
2430. Nancy E. Daileader, form letter dated January 22, 2019 (Daileader_FL4_1447)
2431. Cynthia Damato, form letter dated January 14, 2019 (Damato_FL4_774)
2432. Alma Daouaou, form letter dated January 22, 2019 (Daouaou_FL4_1433)
2433. Abdelilah Daouaou, form letter dated January 22, 2019 (Daouaou_FL4_1500)
2434. Patricia Dean, form letter dated January 22, 2019 (Dean_FL4_1535)
2435. Lee Delia, form letter dated January 14, 2019 (Delia_FL4_773)
2436. Michael DellaCorte, form letter dated January 14, 2019 (DellaCorte_FL4_760)
2437. Denise DellaCorte, form letter dated January 22, 2019 (DellaCorte_FL4_1428)
2438. Anne M. DelPrete, form letter dated January 14, 2019 (DelPrete_FL4_770)
2439. Michael T. Derby, form letter dated January 22, 2019 (Derby_FL4_1351)
2440. Petrina DiGange, form letter dated January 14, 2019 (DiGange_FL4_801)
2441. Andrea DiLorenzo, form letter dated January 22, 2019 (DiLorenzo_FL4_1399)
2442. Theresa DiPippa, form letter dated January 14, 2019 (DiPippa_FL4_834)
2443. James Dodson, form letter dated January 22, 2019 (Dodson_FL4_1545)
2445. Eugene Dolan, form letter dated January 14, 2019 (Dolan_FL4_794)
2447. Diane Dommermuth, form letter dated January 14, 2019 (Dommermuth_FL4_684)
2448. Joan Donnelly, form letter dated January 14, 2019 (Donnelly_FL4_677)
2449. John Donnelly, form letter dated January 22, 2019 (Donnelly_FL4_1343)
2450. Fran Donnelly, form letter dated January 22, 2019 (Donnelly_FL4_1344)
Elaine Doster, form letter dated March 1, 2019 (Doster_FL4_2498)
Vincent Dragone, form letter dated January 14, 2019 (Dragone_FL4_787)
Anna Dragone, form letter dated January 14, 2019 (Dragone_FL4_788)
Theresa Dragone-Meegan, form letter dated January 14, 2019 (Dragone-Meegan_FL4_792)
Patricia D. Dreyer, form letter dated January 22, 2019 (Dreyer_FL4_1493)
Thomas Dreyer, form letter dated January 22, 2019 (Dreyer_FL4_1496)
William F. Emmel, form letter dated January 22, 2019 (Emmel_FL4_1487)
Patricia D. Eren, form letter dated January 14, 2019 (Eren_FL4_680)
Helene Esposito, form letter dated January 22, 2019 (Esposito_FL4_1560)
Francis Eusebio, form letter dated January 14, 2019 (Eusebio_FL4_723)
Paraskevi Evola, form letter dated January 14, 2019 (Evola_FL4_768)
Kenneth Fairben, form letter dated January 22, 2019 (Fairben_FL4_1426)
Suzanne Faith, form letter dated January 14, 2019 (Faith_FL4_690)
Christine Farrell, form letter dated January 14, 2019 (Farrell_FL4_816)
James C. Farrell, form letter dated January 22, 2019 (Farrell_FL4_1457)
Christine M. Farrell, form letter dated January 22, 2019 (Farrell_FL4_1458)
Stephanie Fattorini, form letter dated January 22, 2019 (Fattorini_FL4_1451)
Peffy Fenton, form letter dated January 14, 2019 (Fenton_FL4_708)
Debra Fenton, form letter dated January 22, 2019 (Fenton_FL4_1347)
Peter J. Fenton, form letter dated January 22, 2019 (Fenton_FL4_1348)
David Fernandez, form letter dated January 22, 2019 (Fernandez_FL4_1547)
Susan M. Filshie, form letter dated January 14, 2019 (Filshie_FL4_739)
John Filshie, form letter dated January 14, 2019 (Filshie_FL4_740)
Kevin Fitzgerald, form letter dated January 14, 2019 (Fitzgerald_FL4_674)
Jennifer Fitzgerald, form letter dated January 22, 2019 (Fitzgerald_FL4_1359)
Kathryn Flood, form letter dated January 14, 2019 (Flood_FL4_805)
Kathryn Flood, form letter dated January 14, 2019 (Flood_FL4_837)
Kevin J. Flood, form letter dated January 22, 2019 (Flood_FL4_1405)
Kristin M. Flood, form letter dated January 22, 2019 (Flood_FL4_1488)
Mary Flynn, form letter dated January 28, 2019 (Flynn_FL4_2205)
Lisa Foy, form letter dated January 14, 2019 (Foy_FL4_732)
Steven Foy, form letter dated January 14, 2019 (Foy_FL4_733)
R. Friedman, form letter dated January 14, 2019 (Friedman_FL4_717)
Mabel M. Galanek, form letter dated January 22, 2019 (Galanek_FL4_1461)
Melissa Gallagher, form letter dated January 14, 2019 (Gallagher_FL4_779)
Gary Gallielli, form letter dated January 14, 2019 (Gallielli_FL4_780)
Joseph Gambino, form letter dated January 22, 2019 (Gambino_FL4_1514)
Louis Gamaauato, form letter dated January 22, 2019 (Gamaauato_FL4_1397)
Donna Gamaauato, form letter dated January 22, 2019 (Gamaauato_FL4_1404)
Robert Ganun, form letter dated January 22, 2019 (Ganun_FL4_1382)
Patricia Ganun, form letter dated January 22, 2019 (Ganun_FL4_1383)
Joseph M. Gargiulo, form letter dated January 22, 2019 (Gargiulo_FL4_1462)
Francis Gehrling, form letter dated March 1, 2019 (Gehrling_FL4_2445)
Frederick Gehrling, form letter dated March 1, 2019 (Gehrling_FL4_2452)
Edward Geraghty, form letter dated January 22, 2019 (Geraghty_FL4_1551)
Noreen Gill, form letter dated January 14, 2019 (Gill_FL4_673)
James Gill, form letter dated January 23, 2019 (Gill_FL4_1571)
2498. Jennifer Gill, form letter dated January 23, 2019 (Gill_FL4_1572)
2499. Kaitlyn Gill, form letter dated January 23, 2019 (Gill_FL4_1573)
2500. Gregory Girardi, form letter dated January 14, 2019 (Girardi_FL4_797)
2501. Christina Girardi, form letter dated January 14, 2019 (Girardi_FL4_798)
2502. Gregory Girardi, form letter dated January 14, 2019 (Girardi_FL4_808)
2503. Angela Girardi, form letter dated January 14, 2019 (Girardi_FL4_810)
2504. Elizabeth M. Glaser, form letter dated January 14, 2019 (Glaser_FL4_818)
2505. Sean Glennon, form letter dated January 22, 2019 (Glennon_FL4_1389)
2506. Maureen Glennon Hieb, form letter dated January 22, 2019 (Glennon Hieb_FL4_1512)
2507. Lorraine Goodis, form letter dated January 14, 2019 (Goodis_FL4_736)
2508. P Gormley, form letter dated January 22, 2019 (Gormley_FL4_1337)
2509. Joseph Gormley, form letter dated January 23, 2019 (Gormley_FL4_1567)
2510. Kevin Gormley, form letter dated January 23, 2019 (Gormley_FL4_1568)
2511. Walter E. Gosden, form letter dated January 14, 2019 (Gosden_FL4_840)
2512. Judith Greene, form letter dated January 22, 2019 (Greene_FL4_1394)
2513. Kevin Greene, form letter dated January 22, 2019 (Greene_FL4_1470)
2514. Anne Groshans, form letter dated January 14, 2019 (Groshans_FL4_731)
2515. Nancy Gross, form letter dated January 22, 2019 (Gross_FL4_1387)
2516. A. Guadagno, form letter dated January 14, 2019 (Guadagno_FL4_726)
2517. Catherine Guadagno, form letter dated January 14, 2019 (Guadagno_FL4_730)
2518. Francis Gunziter, form letter dated January 22, 2019 (Gunziter_FL4_1444)
2520. James Handlin, form letter dated January 14, 2019 (Handlin_FL4_841)
2521. James Handlin, form letter dated January 22, 2019 (Handlin_FL4_1328)
2522. Mary Harkins, form letter dated January 22, 2019 (Harkins_FL4_1456)
2523. Deborah Hastings, form letter dated January 22, 2019 (Hastings_FL4_1320)
2524. Una Hayden, form letter dated January 22, 2019 (Hayden_FL4_1384)
2525. Douglas J. Hayden, form letter dated January 22, 2019 (Hayden_FL4_1490)
2527. Evelyn M. Hegler, form letter dated March 1, 2019 (Hegler_FL4_2433)
2528. Lauren Henderson, form letter dated January 23, 2019 (Henderson_FL4_1569)
2530. Aileen Hennelly, form letter dated January 14, 2019 (Hennelly_FL4_737)
2531. Lynn Henry, form letter dated January 22, 2019 (Henry_FL4_1432)
2532. Pat Hill, form letter dated March 1, 2019 (Hill_FL4_2491)
2533. Kathleen Hopkins, form letter dated January 14, 2019 (Hopkins_FL4_769)
2534. Suzanne Huber, form letter dated January 22, 2019 (Huber_FL4_1440)
2535. Karen Hughes, form letter dated January 14, 2019 (Hughes_FL4_699)
2536. Shanthy Hughes, form letter dated January 14, 2019 (Hughes_FL4_721)
2537. John Hughes, form letter dated January 22, 2019 (Hughes_FL4_1366)
2538. Claire Hughes, form letter dated January 22, 2019 (Hughes_FL4_1368)
2539. Winifred B. Hughes, form letter dated January 22, 2019 (Hughes_FL4_1370)
2540. John M. Hughes, form letter dated January 22, 2019 (Hughes_FL4_1371)
2541. Daniel Hughes, form letter dated January 22, 2019 (Hughes_FL4_1475)
2542. Heather Hughes, form letter dated January 22, 2019 (Hughes_FL4_1506)
2543. Michael R. Jakob, form letter dated January 22, 2019 (Jakob_FL4_1450)
2544. Mary R. Kane, form letter dated January 14, 2019 (Kane_FL4_820)
2545. James Kane, form letter dated January 22, 2019 (Kane_FL4_1529)
2546. John F. Keenan, form letter dated January 14, 2019 (Keenan_FL4_754)
2547. Kathleen L. Keenan, form letter dated January 14, 2019 (Keenan_FL4_755)
2548. William Kelleher, form letter dated January 14, 2019 (Kelleher_FL4_762)
2549. Frances C. Kellner, form letter dated January 22, 2019 (Kellner_FL4_1372)
2550. Ann Kellner, form letter dated January 22, 2019 (Kellner_FL4_1391)
2551. James Kelly, form letter dated January 22, 2019 (Kelly_FL4_1329)
2552. Margaret A. Kelly, form letter dated January 22, 2019 (Kelly_FL4_1369)
2553. Jessica Kelly-Brown, form letter dated January 22, 2019 (Kelly-Brown_FL4_1424)
2554. Patrick M. Kenneally, form letter dated January 22, 2019 (Kenneally_FL4_1483)
2555. Luke Kenneally, form letter dated March 1, 2019 (Kenneally_FL4_2455)
2556. Ellen Kenneally, form letter dated March 1, 2019 (Kennealy_FL4_2471)
2557. Kevin R. Kennedy, form letter dated January 22, 2019 (Kennedy_FL4_1469)
2558. Amy Kerrigan, form letter dated January 14, 2019 (Kerrigan_FL4_1492)
2559. Kazi Islam & Pervez Khaled, form letter dated January 22, 2019 (Khaled_FL4_1379)
2560. Admen Khan, form letter dated January 14, 2019 (Khan_FL4_692)
2561. Farooq Khawaja, form letter dated January 22, 2019 (Khawaja_FL4_1499)
2562. Marylou King, form letter dated January 22, 2019 (King_FL4_1524)
2563. P. Kirby, form letter dated January 22, 2019 (Kirby_FL4_1492)
2564. Kevin Kiss, form letter dated January 22, 2019 (Kiss_FL4_1448)
2565. Alexander M. Koester, form letter dated March 1, 2019 (Koester_FL4_2524)
2566. Anthony Kruzenski, form letter dated January 22, 2019 (Kruzenski_FL4_1361)
2567. Emily Kruzenski, form letter dated January 22, 2019 (Kruzenski_FL4_1365)
2568. Dana Laffey, form letter dated January 22, 2019 (Laffey_FL4_1378)
2569. Kathleen Lally, form letter dated January 22, 2019 (Lally_FL4_1497)
2570. Robert LaMarche, form letter dated January 22, 2019 (LaMarche_FL4_1441)
2571. Darlene Lanza, form letter dated January 22, 2019 (Lanza_FL4_1357)
2572. Frances Lanzetta, form letter dated January 14, 2019 (Lanzetta_FL4_833)
2573. Lisa Lanzetta, form letter dated January 22, 2019 (Lanzetta_FL4_1349)
2574. Frances Lanzetta, form letter dated January 22, 2019 (Lanzetta_FL4_1356)
2575. Elizabeth Lauria, form letter dated January 14, 2019 (Lauria_FL4_728)
2576. Lauren Lavoie, form letter dated January 22, 2019 (Lavoie_FL4_1385)
2577. Meredith Libertadore, form letter dated January 14, 2019 (Libertadore_FL4_819)
2578. Lucas Librie, form letter dated January 8, 2019 (Librie_FL4_071)
2579. Lucas Librie, form letter dated January 8, 2019 (Librie_FL4_1554)
2580. Elaine Licari, form letter dated January 22, 2019 (Licari_FL4_1501)
2581. Carol J. Lipsky, form letter dated January 14, 2019 (Lipsky_FL4_826)
2582. Maria Locascio, form letter dated January 22, 2019 (Locascio_FL4_1460)
2583. Regina Lohen, form letter dated January 22, 2019 (Lohen_FL4_1350)
2584. Krista Longobardi, form letter dated January 14, 2019 (Longobardi_FL4_676)
2585. Denise Longobardi, form letter dated January 22, 2019 (Longobardi_FL4_1414)
2586. Michael Longobardi, form letter dated January 22, 2019 (Longobardi_FL4_1507)
2587. M Lovari, form letter dated January 14, 2019 (Lovari_FL4_824)
2588. Rosalie Lozano, form letter dated January 14, 2019 (Lozano_FL4_764)
2589. Lorraine Lubich, form letter dated January 14, 2019 (Lubich_FL4_804)
2590. Paul Lubich, form letter dated January 22, 2019 (Lubich_FL4_1536)
2591. Peggy E. Lyons, form letter dated January 22, 2019 (Lyons_FL4_1491)
2592. James E. MacDonald, form letter dated January 22, 2019 (MacDonald_FL4_1352)
2593. Margaret MacDonald, form letter dated January 22, 2019 (MacDonald_FL4_1362)
Chapter 22: Response to Public Comments

2594. Maureen MacDonald, form letter dated January 22, 2019 (MacDonald_FL4_1393)
2595. Teresa MacDonald, form letter dated January 22, 2019 (MacDonald_FL4_1508)
2596. T. Macko, form letter dated January 14, 2019 (Macko_FL4_825)
2597. Victoria Maclean, form letter dated January 14, 2019 (Maclean_FL4_738)
2598. Valerie Magee, form letter dated January 14, 2019 (Magee_FL4_783)
2599. Jim Mahones, form letter dated January 22, 2019 (Mahones_FL4_1363)
2600. Diane Malone, form letter dated January 22, 2019 (Malone_FL4_1335)
2601. Lorcan Malone, form letter dated January 22, 2019 (Malone_FL4_1377)
2602. Jill Manning, form letter dated January 14, 2019 (Manning_FL4_689)
2603. Laurel Manning, form letter dated January 14, 2019 (Manning_FL4_727)
2604. Maureen Mansfield, form letter dated January 8, 2019 (Mansfield_FL4_068)
2605. Thomas Mansfield, form letter dated January 8, 2019 (Mansfield_FL4_069)
2606. Maggie Mansfield, form letter dated January 8, 2019 (Mansfield_FL4_070)
2607. Thomas Mansfield, form letter dated January 8, 2019 (Mansfield_FL4_1556)
2609. Lenore Marchiano, form letter dated January 22, 2019 (Marchiano_FL4_1392)
2610. Janet Marino, form letter dated March 1, 2019 (Marino_FL4_2437)
2611. Brigid Marmorowski, form letter dated January 22, 2019 (Marmorowski_FL4_1544)
2612. Patricia Martinez, form letter dated January 22, 2019 (Martinez_FL4_1550)
2613. Sally Martucci, form letter dated January 14, 2019 (Martucci_FL4_718)
2614. Robert Martucci, form letter dated January 14, 2019 (Martucci_FL4_719)
2615. Mary Jane Mastrella, form letter dated January 22, 2019 (Mastrella_FL4_1473)
2616. Michele Mayo, form letter dated January 14, 2019 (Mayo_FL4_707)
2617. Frank & Peg McCaffrey, form letter dated January 22, 2019 (McCaffrey_FL4_1540)
2619. Heather McClintock, form letter dated January 22, 2019 (McClintock_FL4_1422)
2620. Brian McClintock, form letter dated January 22, 2019 (McClintock_FL4_1505)
2621. Patricia McCormack, form letter dated January 14, 2019 (McCormack_FL4_672)
2622. Dana McCoy, form letter dated January 14, 2019 (McCoy_FL4_766)
2623. Anne Marie McGeever, form letter dated January 22, 2019 (McGeever_FL4_1445)
2624. Finola McGovern, form letter dated January 14, 2019 (McGovern_FL4_796)
2625. Brian McGovern, form letter dated January 22, 2019 (McGovern_FL4_1502)
2627. Leah McGovern, form letter dated January 22, 2019 (McGovern_FL4_1533)
2628. Roger McGovern, form letter dated January 22, 2019 (McGovern_FL4_1534)
2629. G. McGowan, form letter dated January 22, 2019 (McGowan_FL4_1419)
2630. Marian McGrane, form letter dated January 14, 2019 (McGrane_FL4_681)
2631. Angela McGuire, form letter dated January 22, 2019 (McGuire_FL4_1509)
2632. James McGuire, form letter dated January 22, 2019 (McGuire_FL4_1518)
2633. Brian McHale, form letter dated January 22, 2019 (McHale_FL4_1410)
2634. Mary McInerney, form letter dated January 22, 2019 (McInerney_FL4_1452)
2635. Thomas Merle, form letter dated January 22, 2019 (Merle_FL4_1479)
2636. Russell Mesnick, form letter dated January 22, 2019 (Mesnick_FL4_1530)
2637. Kyle Meyfohrt, form letter dated January 22, 2019 (Meyfohrt_FL4_1353)
2638. Kurt Meyfohrt, form letter dated January 22, 2019 (Meyfohrt_FL4_1354)
2639. Deborah Meyfohrt, form letter dated January 22, 2019 (Meyfohrt_FL4_1355)
2640. Donald Mezzett, form letter dated January 22, 2019 (Mezzett_FL4_1495)
2641. Mia Minogue, form letter dated January 14, 2019 (Minogue_FL4_789)
2642. Shannon Moroney, form letter dated January 14, 2019 (Moroney_FL4_741)
2643. Thomas Moroney, form letter dated January 14, 2019 (Moroney_FL4_802)
2644. Kathleen Morrongello, form letter dated January 22, 2019 (Morrongello_FL4_1522)
2645. Asmaa Mounir, form letter dated January 14, 2019 (Mounir_FL4_710)
2646. Neil Mulhall, form letter dated January 22, 2019 (Mulhall_FL4_1417)
2647. John Mulhall, form letter dated January 22, 2019 (Mulhall_FL4_1464)
2648. Kathleen Mulhall, form letter dated January 22, 2019 (Mulhall_FL4_1471)
2649. Marc Mullen, form letter dated January 22, 2019 (Mullen_FL4_1406)
2650. Elisabeth Mullen, form letter dated January 22, 2019 (Mullen_FL4_1467)
2651. Judy Muller, form letter dated January 14, 2019 (Muller_FL4_772)
2652. Kathy Muller, form letter dated January 22, 2019 (Muller_FL4_1425)
2653. Alfred Muller, form letter dated January 22, 2019 (Muller_FL4_1484)
2654. Sheila Mulligan, form letter dated January 14, 2019 (Mulligan_FL4_828)
2655. Paul Muraski, form letter dated March 1, 2019 (Muraski_FL4_2421)
2656. Mike Murphy, form letter dated January 14, 2019 (Murphy_FL4_777)
2657. Camille E. Murphy, form letter dated January 14, 2019 (Murphy_FL4_835)
2658. Anne Marie Murphy, form letter dated January 22, 2019 (Murphy_FL4_1520)
2659. Nancy Muscat, form letter dated January 14, 2019 (Muscat_FL4_712)
2660. Saralyss S. Musynske, form letter dated January 14, 2019 (Musynske_FL4_785)
2661. John Musynske, form letter dated January 14, 2019 (Musynske_FL4_786)
2662. Christina Nardella, form letter dated January 14, 2019 (Nardella_FL4_767)
2663. Marianne & Damian Nardello, form letter dated January 22, 2019 (Nardello_FL4_1380)
2664. Brian Naughton, form letter dated January 22, 2019 (Naughton_FL4_1466)
2668. Vickey Niles, form letter dated January 14, 2019 (Niles_FL4_775)
2669. Tara Nugent, form letter dated January 14, 2019 (Nugent_FL4_771)
2670. Frank O'Boyle, form letter dated January 22, 2019 (O'Boyle_FL4_1455)
2671. MK O'Brien, form letter dated January 14, 2019 (O'Brien_FL4_694)
2672. Russell O'Brien, form letter dated January 22, 2019 (O'Brien_FL4_1472)
2674. Diane O'Donnell, form letter dated January 14, 2019 (O'Donnell_FL4_695)
2675. Mary O'Donoghue, form letter dated January 14, 2019 (O'Donoghue_FL4_814)
2676. John O'Donoghue, form letter dated January 14, 2019 (O'Donoghue_FL4_815)
2677. Jaclyn O'Donohue, form letter dated January 14, 2019 (O'Donohue_FL4_706)
2678. M. O'Donohue, form letter dated January 22, 2019 (O'Donohue_FL4_1434)
2679. R. O'Donohue, form letter dated January 22, 2019 (O'Donohue_FL4_1436)
2680. Maria O'Grady, form letter dated January 22, 2019 (O'Grady_FL4_1468)
2681. Joseph O'Grady, form letter dated January 22, 2019 (O'Grady_FL4_1439)
2682. Margaret O'Keefe, form letter dated January 14, 2019 (O'Keefe_FL4_701)
2683. Melissa O'Leary, form letter dated January 14, 2019 (O'Leary_FL4_711)
2684. Mary Jane O'Malley, form letter dated January 23, 2019 (O'Malley_FL4_1561)
2685. Nicholas O'Malley, form letter dated January 23, 2019 (O'Malley_FL4_1562)
2686. Bernard O'Malley, form letter dated January 23, 2019 (O'Malley_FL4_1577)
2687. Diane Mills O'Reilly, form letter dated January 22, 2019 (O'Reilly_FL4_1338)
Chapter 22: Response to Public Comments

2688. Siobhan O'Reily, form letter dated January 14, 2019 (O'Reily_FL4_729)
2689. Anne Marie Olton, form letter dated January 14, 2019 (Olton_FL4_705)
2690. Maria Olynec, form letter dated January 14, 2019 (Olynec_FL4_724)
2691. Christine Orkwis, form letter dated January 14, 2019 (Orkwis_FL4_776)
2692. Maria E. Ortega, form letter dated January 14, 2019 (Ortega_FL4_709)
2693. Emilia Palamara, form letter dated March 1, 2019 (Palamara_FL4_2417)
2694. John Paley, form letter dated January 22, 2019 (Paley_FL4_1435)
2695. Laura Pape, form letter dated January 14, 2019 (Pape_FL4_703)
2696. Terry Paterno, form letter dated January 22, 2019 (Paterno_FL4_1480)
2697. Robert Paterno, form letter dated January 22, 2019 (Paterno_FL4_1519)
2698. Robert Pedley, form letter dated January 22, 2019 (Pedley_FL4_1446)
2699. Patricia V. Pedley, form letter dated March 1, 2019 (Pedley_FL4_2425)
2700. John Peiser, form letter dated January 22, 2019 (Peiser_FL4_1413)
2701. Kathryn L. Peiser, form letter dated January 22, 2019 (Peiser_FL4_1546)
2702. Kaitlyn Perge, form letter dated January 11, 2019 (Perge_FL4_050)
2703. Catherine Peterson, form letter dated January 22, 2019 (Peterson_FL4_1375)
2704. Joseph Petrosino, form letter dated March 1, 2019 (Petrosino_FL4_2409)
2705. Neil Petrosino, form letter dated March 1, 2019 (Petrosino_FL4_2413)
2706. Uliana Petrosino, form letter dated March 1, 2019 (Petrosino_FL4_2443)
2707. Carl Petrosino, form letter dated March 1, 2019 (Petrosino_FL4_2517)
2709. Julius Picaradi, form letter dated January 22, 2019 (Picaradi_FL4_1360)
2710. Teresa Piotrowski, form letter dated March 1, 2019 (Piotrowski_FL4_2504)
2711. Anne Pollack, form letter dated January 22, 2019 (Pollack_FL4_1541)
2712. Megan Power, form letter dated January 22, 2019 (Power_FL4_1336)
2713. Daniel Praino, form letter dated January 22, 2019 (Praino_FL4_1494)
2714. Kristine Prestia, form letter dated January 14, 2019 (Prestia_FL4_716)
2715. Christopher Prestia, form letter dated January 22, 2019 (Prestia_FL4_1364)
2716. Kathryn Quaderer, form letter dated January 22, 2019 (Quaderer_FL4_1339)
2717. Lourdes Quijano, form letter dated January 22, 2019 (Quijano_FL4_1376)
2718. Roger Raiford, form letter dated January 22, 2019 (Raiford_FL4_1400)
2719. John Raleigh, form letter dated January 14, 2019 (Raleigh_FL4_742)
2720. Bridget Raleigh, form letter dated January 14, 2019 (Raleigh_FL4_743)
2721. Luise E. Ranegan, form letter dated January 14, 2019 (Ranegan_FL4_803)
2722. Fran Rasquin, form letter dated January 14, 2019 (Rasquin_FL4_800)
2723. C. Rasquin, form letter dated January 14, 2019 (Rasquin_FL4_809)
2724. Liz Reisch, form letter dated January 22, 2019 (Reisch_FL4_1442)
2725. Christine Reisig, form letter dated January 22, 2019 (Reisig_FL4_1415)
2726. Mark Reisig, form letter dated January 22, 2019 (Reisig_FL4_1498)
2727. Amy Richardson, form letter dated January 14, 2019 (Richardson_FL4_756)
2728. Lynn Riosfio, form letter dated January 14, 2019 (Riosfio_FL4_698)
2729. Daniel Riordan, form letter dated March 1, 2019 (Riordan_FL4_2463)
2730. Tracey Riordan, form letter dated March 1, 2019 (Riordan_FL4_2467)
2731. Sharon Rivilli, form letter dated January 14, 2019 (Rivilli_FL4_745)
2732. Frank Rivilli, form letter dated January 14, 2019 (Rivilli_FL4_747)
2733. Jane Rizzo, form letter dated January 14, 2019 (Rizzo_FL4_685)
2734. Dennis J. Roller, form letter dated January 22, 2019 (Roller_FL4_1321)
2735. Michaela Roller, form letter dated January 22, 2019 (Roller_FL4_1322)
Belmont Park Redevelopment Civic and Land Use Improvement Project FEIS

2736. Donna Roller, form letter dated January 22, 2019 (Roller_FL4_1323)
2737. Janet Romano Murray, form letter dated January 22, 2019 (Romano Murray_FL4_1443)
2738. Patricia Ronan, form letter dated January 14, 2019 (Ronan_FL4_757)
2739. Paula Rowe, form letter dated January 14, 2019 (Rowe_FL4_811)
2740. M. Ruscica, form letter dated January 22, 2019 (Ruscica_FL4_1481)
2741. Kathleen M. Ryan, form letter dated January 14, 2019 (Ryan_FL4_765)
2742. Michelle Ryan, form letter dated January 22, 2019 (Ryan_FL4_1340)
2743. Sundas Salman, form letter dated January 14, 2019 (Salman_FL4_696)
2744. Christopher Salogub, form letter dated January 22, 2019 (Salogub_FL4_1373)
2745. Allen Sankovitch, form letter dated January 14, 2019 (Sankovitch_FL4_691)
2746. Anne Marie Santangelo, form letter dated January 14, 2019 (Santangelo_FL4_686)
2747. Vito Santoruvo, form letter dated January 14, 2019 (Santoruvo_FL4_758)
2748. Daisy Santoruvo, form letter dated January 14, 2019 (Santoruvo_FL4_759)
2749. Eugena & Robert Sarro, form letter dated January 22, 2019 (Sarro_FL4_1548)
2750. Robert M. Savage, form letter dated January 22, 2019 (Savage_FL4_1516)
2751. Michael Saville, form letter dated January 14, 2019 (Saville_FL4_836)
2752. Thomas Saville, form letter dated January 14, 2019 (Saville_FL4_839)
2753. Deborah Sawicho, form letter dated January 22, 2019 (Sawicho_FL4_1527)
2754. Margaret Schlecht, form letter dated January 14, 2019 (Schlecht_FL4_806)
2755. Kenneth Schlecht, form letter dated January 14, 2019 (Schlecht_FL4_807)
2756. Evelyn Schultz, form letter dated January 14, 2019 (Schultz_FL4_671)
2757. Carol Scime-Raiford, form letter dated January 22, 2019 (Scime-Raiford_FL4_1398)
2758. Amy Sebber, form letter dated January 14, 2019 (Sebber_FL4_827)
2759. Joe Serra, form letter dated January 22, 2019 (Serra_FL4_1421)
2760. Gina Settele, form letter dated January 22, 2019 (Settele_FL4_1478)
2761. Steven Settele, form letter dated January 22, 2019 (Settele_FL4_1521)
2762. Amy Sexton, form letter dated January 14, 2019 (Sexton_FL4_744)
2763. John Sexton, form letter dated January 22, 2019 (Sexton_FL4_1465)
2764. Matthew Sexton, form letter dated January 22, 2019 (Sexton_FL4_1511)
2765. Kathleen P. Shaw, form letter dated January 22, 2019 (Shaw_FL4_1459)
2766. Terry Sica, form letter dated January 14, 2019 (Sica_FL4_720)
2767. Thomas Sigismonti, form letter dated January 22, 2019 (Sigismonti_FL4_1423)
2768. Lisa Sindoni, form letter dated January 18, 2019 (Sindoni_FL4_1559)
2769. Siobhan Smith, form letter dated January 14, 2019 (Smith_FL4_822)
2770. Thomas G. Smith, form letter dated January 22, 2019 (Smith_FL4_1381)
2771. Irmalinda Sohan, form letter dated January 14, 2019 (Sohan_FL4_784)
2772. John Speck, form letter dated January 14, 2019 (Speck_FL4_734)
2773. Maggie Speck, form letter dated January 14, 2019 (Speck_FL4_735)
2774. Cheryl Spigonardo, form letter dated January 22, 2019 (Spigonardo_FL4_1326)
2775. Vanessa Spinner, form letter dated January 14, 2019 (Spinner_FL4_682)
2776. Marilyn J. Sprague, form letter dated January 22, 2019 (Sprague_FL4_1531)
2777. Stephen Sprague, form letter dated January 22, 2019 (Sprague_FL4_1532)
2778. Josephine Stanco, form letter dated January 28, 2019 (Stanco_FL4_2204)
2779. Margaret Sullivan, form letter dated January 22, 2019 (Sullivan_FL4_1333)
2782. Carolyn Susino, form letter dated January 23, 2019 (Susino_FL4_1574)
2783. Tara Sweeney, form letter dated January 14, 2019 (Sweeney_FL4_713)
Chapter 22: Response to Public Comments

2784. Kathy Sweeney, form letter dated January 14, 2019 (Sweeney_FL4_715)
2785. Helena Swierkosz, form letter dated March 1, 2019 (Swierkosz_FL4_2512)
2786. Paul Szymanski, form letter dated January 8, 2019 (Szymanski_FL4_073)
2787. Paul Szymanski, form letter dated January 8, 2019 (Szymanski_FL4_1553)
2788. Ingrid S. Tavers, form letter dated January 22, 2019 (Tavers_FL4_1525)
2789. Christine Thorpe, form letter dated January 22, 2019 (Thorpe_FL4_1401)
2790. Laura Tommony, form letter dated January 14, 2019 (Tommony_FL4_763)
2791. George Torres, form letter dated January 14, 2019 (Torres_FL4_823)
2792. Michael Towey, form letter dated January 22, 2019 (Towey_FL4_1476)
2793. Mary Towey, form letter dated January 22, 2019 (Towey_FL4_1513)
2794. John T. Trainor, form letter dated January 22, 2019 (Trainor_FL4_1390)
2795. Kate Trainor, form letter dated January 22, 2019 (Trainor_FL4_1477)
2796. Laura J. Trentacoste, form letter dated January 22, 2019 (Trentacoste_FL4_1325)
2797. Sal & Marina Trentacoste, form letter dated January 22, 2019 (Trentacoste_FL4_1420)
2798. Tim Turmi, form letter dated March 1, 2019 (Turmi_FL4_2404)
2799. Thomas J. Tweedy, form letter dated January 22, 2019 (Tweedy_FL4_1552)
2800. Roy Tyson, form letter dated January 22, 2019 (Tyson_FL4_1526)
2801. Unknown, form letter dated March 1, 2019 (Unknown_FL4_2487)
2802. Unknown, form letter dated March 1, 2019 (Unknown_FL4_2508)
2803. Michael Valaner, form letter dated January 14, 2019 (Valaner_FL4_831)
2804. Joe Vale, form letter dated January 22, 2019 (Vale_FL4_1388)
2805. Trisha Vecchione, form letter dated February 25, 2019 (Vecchione_FL4_2324)
2806. Joseph Vetromiglia, form letter dated January 22, 2019 (Vetromiglia_FL4_1412)
2807. Christina Vincent, form letter dated January 14, 2019 (Vincent_FL4_693)
2808. Linda Vota, form letter dated January 14, 2019 (Vota_FL4_821)
2809. Matthew P. W, form letter dated January 22, 2019 (W_FL4_1549)
2810. Kathleen Wagner-Tyson, form letter dated January 22, 2019 (Wagner-Tyson_FL4_1407)
2811. Lester F. Wahrenburg, form letter dated January 22, 2019 (Wahrenburg_FL4_1523)
2812. Joan Walsh, form letter dated March 1, 2019 (Walsh_FL4_2493)
2813. Caroline Ward, form letter dated January 22, 2019 (Ward_FL4_1318)
2814. Thomas Ward, form letter dated January 22, 2019 (Ward_FL4_1319)
2815. Tracy Ward, form letter dated January 22, 2019 (Ward_FL4_1324)
2816. Margaret Weichert, form letter dated January 22, 2019 (Weichert_FL4_1538)
2817. Janet Wille, form letter dated January 14, 2019 (Wille_FL4_678)
2818. Steve Winters, form letter dated January 22, 2019 (Winters_FL4_1482)
2819. George Wrage, form letter dated January 22, 2019 (Wrage_FL4_1374)
2820. Linnea Wrage, form letter dated January 22, 2019 (Wrage_FL4_1386)
2821. Elizabeth Wysocki, form letter dated January 14, 2019 (Wysocki_FL4_812)
2822. Richard Wysocki, form letter dated January 14, 2019 (Wysocki_FL4_813)
2823. Herbert Zahner, form letter dated January 22, 2019 (Zahner_FL4_1537)

FORM LETTER 5

2824. Maria Clark, form letter dated January 12, 2019 (Clark_FL5_056)
2825. Patricia and Desmond Costello, form letter dated January 10, 2019 (Costello_FL5_843)
2826. Peggy Lyons, form letter dated January 9, 2019 (Lyons_FL5_038)
FORM LETTER 6

2827. Joseph Chowske, form letter dated January 6, 2019 (Chowske_FL6_128)
2828. Kathleen Coffey, form letter dated January 10, 2019 (Coffey_FL6_842)
2829. William Figueroa, form letter dated January 7, 2019 (Figueroa_FL6_114)
2830. Raquel Francis, form letter dated January 6, 2019 (Francis_FL6_127)
2831. Virginia Gallo, form letter dated January 8, 2019 (Gallo_FL6_118)
2832. Erin Gayron, form letter dated January 8, 2019 (Gayron_FL6_110)
2833. Erin Gayron, form letter dated January 8, 2019 (Gayron_FL6_113)
2834. Carin Harkins, form letter dated January 7, 2019 (Harkins_FL6_111)
2835. Brian McHale, form letter dated January 6, 2019 (McHale_FL6_125)
2836. Kathryn Quaderer, form letter dated January 9, 2019 (Quaderer_FL6_117)
2837. Matthew Sexton, form letter dated January 6, 2019 (Sexton_FL6_119)
2838. Amy Sexton, form letter dated January 6, 2019 (Sexton_FL6_120)
2839. Jack Sexton, form letter dated January 6, 2019 (Sexton_FL6_121)
2840. Paul Szymanski, form letter dated January 6, 2019 (Szymanski_FL6_123)
2841. Debbie Urban, form letter dated January 6, 2019 (Urban_FL6_124)
2842. Edward Vincent, form letter dated January 7, 2019 (Vincent_FL6_116)
2843. Eileen Walsh, form letter dated January 9, 2019 (Walsh_FL6_112)
2844. Bill Youngfert, form letter dated January 6, 2019 (Youngfert_FL6_122)

FORM LETTER 7

2845. Nelson Aguilar, form letter dated February 5, 2019 (Aguilar_FL7_2186)
2846. Michael Algarin, form letter dated February 11, 2019 (Algarin_FL7_2172)
2847. Michael Algarin, form letter dated March 1, 2019 (Algarin_FL7_2389)
2848. Giovanny Altamirano, form letter dated February 11, 2019 (Altamirano_FL7_2171)
2849. Giovanny Altamirano, form letter dated March 1, 2019 (Altamirano_FL7_2388)
2850. Matthew Angevine, Jr., form letter dated February 4, 2019 (Angevine, Jr._FL7_2178)
2851. Sean Brown, form letter dated February 11, 2019 (Brown_FL7_2168)
2852. Sean Brown, form letter dated March 1, 2019 (Brown_FL7_2385)
2853. Kevin Coghan, form letter dated February 11, 2019 (Coghan_FL7_2167)
2854. Kevin Coghan, form letter dated February 7, 2019 (Coghan_FL7_2193)
2855. Kevin Coghan, form letter dated March 1, 2019 (Coghan_FL7_2384)
2856. Omar E. Cordero, form letter dated February 4, 2019 (Cordero_FL7_2180)
2857. Ray Crawford, form letter dated February 11, 2019 (Crawford_FL7_2161)
2858. Raymond Crawford, form letter dated March 1, 2019 (Crawford_FL7_2378)
2859. Kenneth Crowley, form letter dated February 11, 2019 (Crowley_FL7_2158)
2860. Kenneth Crowley, form letter dated March 1, 2019 (Crowley_FL7_2375)
2861. Andrew Cucellario, form letter dated February 5, 2019 (Cucellario_FL7_2191)
2862. Danielle D'Amico, form letter dated February 5, 2019 (D'Amico_FL7_2187)
2863. Edrick De Castro, form letter dated February 11, 2019 (De Castro_FL7_2155)
2864. Edrick De Castro, form letter dated March 1, 2019 (De Castro_FL7_2372)
2865. Nimrod Decaille, form letter dated February 4, 2019 (Decaille_FL7_2181)
2866. Steven J. Ewald, form letter dated February 11, 2019 (Ewald_FL7_2162)
2867. Steven J. Ewald, form letter dated March 1, 2019 (Ewald_FL7_2379)
2868. Steven Faulkner, form letter dated February 11, 2019 (Faulkner_FL7_2170)
2869. Steven J. Faulkner, form letter dated March 1, 2019 (Faulkner_FL7_2387)
2870. Robert Ferreiro, form letter dated February 14, 2019 (Ferreiro_FL7_2234)
2871. Keith Franco, form letter dated March 1, 2019 (Franco_FL7_2391)
Chapter 22: Response to Public Comments

2872. Robert G, form letter dated February 4, 2019 (G_FL7_2183)
2873. Rob Giugliano, form letter dated February 11, 2019 (Giugliano_FL7_2164)
2874. Rob Giugliano, form letter dated March 1, 2019 (Giugliano_FL7_2381)
2875. Michael Griff, form letter dated February 11, 2019 (Griff_FL7_2165)
2876. Michael Griff, form letter dated March 1, 2019 (Griff_FL7_2382)
2877. G Holden, form letter dated February 4, 2019 (Holden_FL7_2179)
2878. Peter Hughes, form letter dated February 4, 2019 (Hughes_FL7_2177)
2879. Daniel R. Jacobsen, form letter dated March 1, 2019 (Jacobsen_FL7_2377)
2880. Daniel R. Jacobson, form letter dated February 11, 2019 (Jacobson_FL7_2160)
2881. Robert Johnson, form letter dated February 11, 2019 (Johnson_FL7_2173)
2882. Robert Johnson, form letter dated March 1, 2019 (Johnson_FL7_2390)
2883. Daniel Kennedy, form letter dated February 11, 2019 (Kennedy_FL7_2157)
2884. Daniel Kennedy, form letter dated March 1, 2019 (Kennedy_FL7_2374)
2885. Thomas L, form letter dated February 5, 2019 (L_FL7_2185)
2886. Peter Liriano, form letter dated February 5, 2019 (Liriano_FL7_2189)
2887. Christopher M, form letter dated February 5, 2019 (M_FL7_2190)
2888. Frederick Margiotta, form letter dated February 11, 2019 (Margiotta_FL7_2166)
2889. Frederick Margiotta, form letter dated March 1, 2019 (Margiotta_FL7_2383)
2890. Michael Matheson, form letter dated February 11, 2019 (Matheson_FL7_2163)
2891. Michael Matheson, form letter dated March 1, 2019 (Matheson_FL7_2380)
2892. Ryan Maurer, form letter dated February 7, 2019 (Maurer_FL7_2192)
2893. Kenneth Moore, form letter dated February 11, 2019 (Moore_FL7_2159)
2894. Kenneth Moore, form letter dated March 1, 2019 (Moore_FL7_2376)
2895. Frank N, form letter dated February 14, 2019 (N_FL7_2235)
2896. Michael Nuttall, form letter dated February 11, 2019 (Nuttall_FL7_2154)
2897. Michael Nuttall, form letter dated March 1, 2019 (Nuttall_FL7_2371)
2898. James J. Oliveira, Jr., form letter dated February 11, 2019 (Oliveira, Jr._FL7_2169)
2899. James J. Oliveira, Jr., form letter dated March 1, 2019 (Oliveira, Jr._FL7_2386)
2900. Frantz Olmann, form letter dated February 4, 2019 (Olmann_FL7_2184)
2901. Edward Rodier, form letter dated February 11, 2019 (Rodier_FL7_2151)
2902. Matthew Rosenkranz, form letter dated February 5, 2019 (Rosenkranz_FL7_2188)
2903. Christopher Rudis, form letter dated February 11, 2019 (Rudis_FL7_2152)
2904. Christopher Rudis, form letter dated March 1, 2019 (Rudis_FL7_2369)
2905. Kevin Schort, form letter dated February 11, 2019 (Schort_FL7_2156)
2906. Kevin Schort, form letter dated March 1, 2019 (Schort_FL7_2373)
2907. Unknown, form letter dated February 4, 2019 (Unknown_FL7_2182)
2908. Brendan Wahl, form letter dated February 11, 2019 (Wahl_FL7_2153)
2909. Brendan Wahl, form letter dated March 1, 2019 (Wahl_FL7_2370)

/* FORM LETTER 8 */

2910. Carri-Ann Crowe, form letter dated January 11, 2019 (Crowe_FL8_2073)
2911. William Crowe, form letter dated February 5, 2019 (Crowe_FL8_2094)
2912. Melanie Szabo, form letter dated February 8, 2019 (Szabo_FL8_2222)
2913. Jason Szabo, form letter dated February 11, 2019 (Szabo_FL8_2228)

/* FORM LETTER 9 */

2914. Carri-Ann Crowe, form letter dated January 11, 2019 (Crowe_FL9_2074)
2915. William Crowe, form letter dated February 5, 2019 (Crowe_FL9_2093)
2916. Melanie Szabo, form letter dated February 8, 2019 (Szabo_FL9_2220)
2917. Jason Szabo, form letter dated February 11, 2019 (Szabo_FL9_2227)