

# MEMORANDUM

## Responses to Public Comments on the FEIS received between July 8, 2019 and August 1, 2019

For the ESD Directors' Meeting August 8, 2019

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### A. INTRODUCTION

This memorandum summarizes and responds to public comments received on the Belmont Park Redevelopment Civic and Land Use Improvement Project's Final Environmental Impact Statement (FEIS), which was issued in corrected and amended form on July 22, 2019. Section B contains a summary of relevant comments on the FEIS and General Project Plan (GPP) not previously received during the public comment period for the Draft Environmental Impact Statement (DEIS), and a response to each. Section C contains comments that repeat what was already received on the DEIS, with references to responses found in Chapter 22, "Response to Public Comments," of the FEIS. A list of elected officials, organizations, and individuals that provided comments on the FEIS can be found in Section D.

### B. RESPONSES TO COMMENTS NOT PREVIOUSLY RECEIVED

#### PROJECT DESCRIPTION

#### *PUBLIC REVIEW PROCESS*

**Comment 1:** The July 8, 2019 Empire State Development (ESD) Board hearing was announced over the 4th of July weekend with three days' notice and miles from the community. This is not a good sign that the EIS is interested in the public's input. (Alfonsi\_TS5\_086, Amato\_172, BPCC\_099, Fitzgerald\_TS5\_072, Fraczek\_TS5\_061, Guilfoyle\_TS5\_063, Marshall\_TS5\_087, McEnery\_180, Muscarella\_226, Phillips\_TS5\_081, Reisig\_194, Reisig\_TS5\_051, Ronan\_126, Smith\_TS5\_079, Stowe\_TS5\_090, Thompson\_TS5\_089, Trentacoste\_TS5\_071, VFP\_169)

**Response:** The noticing of the Special Meeting regarding consideration of the completion of the FEIS complied with New York State Open Meetings Law. ESD Directors' meetings are routinely held at ESD's Main Office located at 633 3rd Avenue, New York, NY.

**Comment 2:** You said there would be about 30 days in between the FEIS release and the vote. (Alfonsi\_TS5\_086)

**Response:** The ESD Directors will vote on the Project August 8, 2019.

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**Comment 3:** It is requested that the complete transcript of the July 8, 2019 ESD board meeting be made part of these comments, and that the FEIS respond to each issue raised in said meeting. (McEnery\_180)

**Response:** In this memorandum, ESD responds to all substantive public comments received as part of the July 8, 2019 ESD Directors meeting and during the subsequent public comment period that ended on August 1, 2019. Responding to these public comments is not required pursuant to the State Environmental Quality Review Act (SEQRA), however, ESD chose to receive these additional public comments and to respond to them in this memorandum.

**Comment 4:** We ask you to reconsider and reissue the FEIS as a Draft and have a new comment period. (Ahrens\_208, Bambrick\_TS5\_050, Chatterton\_207, Culotta\_222, Gorry\_219, Gunther\_205, Lockwood\_210, McEnery\_180, McGuire\_191, Ronan\_126, Ronan\_TS5\_096, Schlechter\_204, VFP\_169, VFP\_TS5\_088, Zacchea\_TS5\_074)

**Response:** As SEQRA requires, an FEIS has been prepared that contains a chapter that summarizes and responds to the substantive comments received on the DEIS during the public hearing and public comment period. The FEIS contains redline indicating the revisions made to the DEIS, including the addition of a new Long Island Rail Road (LIRR) Elmont Station as Project mitigation in response to comments from elected officials and members of the public. There is no need to publish a supplemental DEIS because the document does not identify any new significant adverse impacts. While not required by SEQRA, ESD has provided for an additional public comment period on the FEIS before making its SEQRA findings and taking action on the proposed GPP.

**Comment 5:** The public should have more time to review the FEIS than the 15 days ESD has provided. The fact that the comment period was extended to August 1, 2019 is of no benefit, as the initial period was more widely publicized. (Gunther\_TS5\_095, McEnery\_180, Muscarella\_226, Ra\_179, Ronan\_126, Ronan\_TS5\_096, Trentacoste\_113, VFP\_TS5\_056, VFP\_214, VFP\_215)

The FEIS introduces two major mitigation measures that were not provided in the DEIS: the construction of the Elmont Rail Station and the presentation of a Traffic Management Plan (TMP). While both of these measures will likely reduce automobile trips associated with the project, by presenting them only in the FEIS, the public was not given the opportunity to review or comment on them. By introducing these measures only after the end of the public comment period, the review process is being circumvented. (Ra\_179, VFP\_214, VFP\_215)

**Response:** The public comment period, although not required by SEQRA, has been extended from July 23rd to August 1st. There will be another public meeting when the ESD Directors adopt the SEQRA findings and decide whether to affirm the modified

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GPP and authorize the Project. Prior to considering these actions, the ESD Directors will have the benefit of the additional public comments and responses set out in this memorandum as well as the public testimony that the ESD Directors will receive and consider at that meeting. SEQRA does not require a public hearing on the FEIS. Please also see the response to Comment 4, above.

**Comment 6:** My fear is that the FEIS will take into account the same flaws that were delivered in the Draft proposal and once again we're being asked to change our driving overall behavior and rush to a decision without a solid traffic mitigation plan in place, the safety of all residents, everyday drivers, employees at Belmont and visitors at Belmont, and more importantly, the children of the residents are at risk. (Kelleher\_TS5\_093)

**Response:** Chapter 17, "Mitigation," of the FEIS provides specific measures that have been thoroughly researched to address traffic impacts identified in the FEIS.

**Comment 7:** ESD has fundamentally failed to consider local community needs and desires as mandated by the Urban Development Corporation (UDC) Act. UDC Act § 6266. Instead of significantly reducing the size of the New York Arena Partners (NYAP) project, ESD has allowed the project to grow well beyond what was described in the initial Request for Proposals. In issuing the FEIS, ESD misleadingly claims that certain aspects of the project have been reduced when it is patently obvious that the overall project has grown significantly since the proposal was first selected in December 2017. ESD has completely disregarded local needs and desires, most notably local residents' expressed concern over the project's size and unified request that a smaller project be pursued. (VFP\_214)

**Response:** Throughout the process of planning and development of the Project, ESD complied with UDC Act § 6266 by—among other things—working closely, consulting, or cooperating with local elected officials and community leaders and has given primary consideration to the local needs and desires, including by conducting or participating in 11 public meetings held in the Town of Hempstead and the Borough of Queens, 20 Community Advisory Committee and elected official meetings, and 28 stakeholder tours and smaller community meetings and considering and responding to the public comments received by ESD from elected officials, community leaders, community organizations, local residents and other members of the public, local governmental agencies, local utilities, and others. Based on concerns, needs, and desires expressed during that process and considered by ESD in the planning and development of the Project, ESD reduced the Project's planned retail development, from 435,000 square feet (sf) (350,000 sf on Site B and up to 85,000 sf on Site A) to a maximum of 350,000 sf (315,000 sf on Site B and 35,000 sf on Site A) and reduced the height of the hotel from 250 feet to 150 feet. A request to provide a full-time LIRR station was one of the primary comments received on the DEIS, and was included as mitigation and

fully described and analyzed in the FEIS. Please also see the response to Comment 1-49 in Chapter 22, “Response to Public Comments,” in the FEIS.

**Comment 8:** Commenters questioned whether a separate EIS would be conducted for the LIRR Elmont Station and/or requested that a separate/supplemental environmental impact statement (SEIS) be conducted for the station, citing a lack of time and information necessary to properly evaluate its effects. (Anskat\_150, Baggott\_TS5\_092, Barry\_195, BCCA\_212, BPCC\_165, Cohen\_145, Fattorini\_209, Gelfo\_127, Gormley\_188, Gunther\_205, Henry\_125, Lockwood\_210, Lyons\_146, Martinez\_140, McEnery\_180, McGuire\_191, Saunders\_134, Shea\_189, Smith\_213, Talty\_153, Trentacoste\_113, Trentacoste\_TS5\_071, VFP\_169, VFP\_215, VFP\_TS5\_088)

Local residents, particularly those in Bellerose Terrace, questioned whether there was any public outreach about the LIRR Elmont Station and/or expressed concern about a lack of outreach. (Ahrens\_208, Hartnett\_141, Moriarty\_192, Muscarella\_226, Shea\_189, Russo\_137, Viola\_110, Viola\_111)

The FEIS introduces significant Project components, a new LIRR station and TMP, with no environmental review or public comment, and draws questionable assumptions and conclusions regarding traffic and the “No Retail Village” project alternative. The two primary measures relied upon in the FEIS to mitigate the project’s significant adverse traffic impacts—a new LIRR Elmont Station and a draft TMP—are, remarkably, introduced to the public for the first time in the FEIS. The Project requires much more analysis and public scrutiny, which the FEIS fails to provide. Accordingly, we request that ESD amend the Project’s FEIS and issue an SEIS with a new comment period, so new information and Project modifications can be thoroughly and properly examined. Residents surrounding Belmont deserve no less. (Bambrick\_TS5\_050, NCL\_181, Ronan\_126, VFP\_214, VFP\_169)

It is unfortunate that the ‘No Retail Village’ alternative was not included in the initial DEIS to begin with, which is another reason that the FEIS should be released as an updated DEIS rather than a conclusive FEIS.

**Response:** (McEnery\_180)The local need and desire for expanded train service was expressed frequently in public meetings, in consultations with local elected officials and community leaders, and in numerous public comments on the DEIS asking for full-time train service. The FEIS includes an analysis of the new LIRR Elmont Station as an element of mitigation for the Project’s traffic impacts, and demonstrates that it reduces the Project’s traffic impacts and would not result in any significant adverse environmental impacts while providing a crucial additional mass transit option that was requested by elected officials and many members of the public. In addition to the foregoing, ESD and LIRR met with Bellerose Terrace residents near the new Elmont Station on August 1, 2019.

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The DEIS identified the specific strategies in a TMP aimed at reducing projected traffic demand on both the Cross Island Parkway and targeted local streets. Between the Draft and Final EIS, the TMP was further developed and refined, and—in response to the public and transportation agencies—included a quantitative assessment of the expected mitigation benefits of the plan. The TMP has been shared with, and reviewed by NYSDOT, NYCDOT, and NCDPW and included as an FEIS appendix (see Appendices J and 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. In addition, the FEIS included a fifth alternative—the “No Retail Village Alternative—in response to public comments on the DEIS. This alternative was fully analyzed in Chapter 16 of the FEIS, and all potential impacts of the alternative were compared to those of the Proposed Project. Please also see response to Comment 4.

**Comment 9:** By categorizing certain objections to the project as “form letters,” ESD devalued them relative to non-form letters, and did not acknowledge that the response represented the highest volume of public comment ever received by ESD. (Fitzgerald\_TS5\_072, McEnery\_180)

**Response:** The authors of all comment letters—including form letters—were presented in Section C of Chapter 22, “Response to Public Comments,” of the FEIS, and all substantive comments, including comments found in form letters, were responded to in Chapter 22.

**Comment 10:** It appears ESD’s representatives sought public input primarily from those in support of the proposed project, while those with concerns about the proposed project were mischaracterized by ESD in public statements as outspoken “angry people” whose input was subsequently not properly addressed. (McEnery\_180)

**Response:** All substantive and relevant comments made and submitted during the public review process were considered.

**Comment 11:** Was the Belmont Park Redevelopment Project DEIS sent to the Elmont Memorial Public Library and Floral Park Public Library? (BPCC\_001)

**Response:** A hard copy of the DEIS was delivered to Elmont Memorial Public Library on December 6, 2018. According to FedEx shipment records, the DEIS was received by Elmont Memorial Public Library at 9:52 am on December 7, 2018. Hard copy of the FEIS was delivered to Elmont Memorial Public Library on Tuesday, July 9, 2019. According to FedEx shipment records, the FEIS was received by the Elmont Memorial Public Library at 9:51 am on Wednesday, July 10, 2019. A hard copy of the Corrected and Amended FEIS was delivered to Elmont Memorial Public Library on Monday, July 22, 2019.

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A hard copy of the DEIS was delivered to Floral Park Public Library on December 6, 2018. According to FedEx shipment records, the DEIS was received by Floral Park Public Library at 9:44 am on December 7, 2018. Hard copy of the FEIS was delivered to Floral Park Public Library on July 9, 2019. According to FedEx shipment records, the FEIS was received by the Floral Park Public Library at 10:10 am on July 10, 2019. A hard copy of the Corrected and Amended FEIS was delivered to Elmont Memorial Public Library on Monday, July 22, 2019.

**Comment 12:** I question how the original requests for proposals (RFPs) for this were suddenly withdrawn and replaced with something specific to this project. (Emmel\_100)

**Response:** This has been addressed in Chapter 1, “Project Description,” of the FEIS.

**Comment 13:** There is no document, file, picture, or place that someone can refer to discover the true scope of the Project. (Cardella\_175)

**Response:** Please see the FEIS, available online at: <https://esd.ny.gov/belmont-park-redevelopment-project> or in hard copy at local area libraries, including the Elmont Memorial Public Library and the Floral Park Public Library. The Draft and Final Scope of Work are also available at the above-referenced URL.

**Comment 14:** Representatives of Floral Park urged ESD and the Town of Hempstead board members to at least refer this project to its planning board for its review and comment; after public comments on the DEIS closed on March 1, 2019 the Town of Hempstead board—which includes members of the majority party—stated they were completely opposed to the NYAP proposal. The Town of Hempstead has also not significantly updated its zoning code in over 50 years, which still has Belmont Park designated as residential use in most respects; this should be the subject of a public hearing relating to Belmont Park plan prior to the ESD Board of Directors approving the FEIS. (McEnery\_180)

**Response:** A letter was received from the Town of Hempstead which chose not to act on the Project and instead referred the matter to the Nassau County Planning Commission. 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 15:** Were there any provisions put into place for residents who are hearing and visually impaired? All persons who reside in all the surrounding communities have the right to read, hear, and touch (written brail) for access to this report on a project that will have a direct impact on everyone who lives within a ten (10) mile radius of this development. Do not forget persons with disabilities cannot be left

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out of the process it is the law to make sure you include them including an interpreter for the hearing impaired. (Ahrens\_208, Moriarty\_192)

**Response:** There are no requirements that ESD present an EIS in special formats for the hearing or visually impaired, or that ESD conduct public hearings with an interpreter for the hearing impaired. Specific to the Proposed Project, ESD did not receive requests to provide materials or otherwise accommodate the hearing or visually impaired during the EIS and GPP process.

**Comment 16:** ESD and all involved have done a great job with their vision for the project and with listening to the community. (Teta\_044)

**Response:** Comment noted.

### *PURPOSE AND NEED*

**Comment 17:** The entire 77-acre Nassau Hub, the former Mitchell Field property, should be the location of this megaproject, where the roads and infrastructure are already in place, and not just the Nassau Coliseum itself. While the NYAP Site A and Site B encompass roughly 43 acres, the Nassau Hub is 77 acres, which is therefore much more adaptable to the current NYAP proposed plan. (McEnery\_180)

**Response:** Irrespective of the geographic area for which the commenter was referring (here or in a similar comment on the DEIS), site selection for an arena was not the subject of the EIS. This EIS considered the environmental impacts of the redevelopment of the Proposed Project within Belmont Park and alternate development scenarios within Belmont Park.

**Comment 18:** I am a leader in the Indian community in New York, which includes tens of thousands of parishioners belonging to various denominations. We have looked for a convention center and arena in Queens/Long Island area to hold our annual conferences for many years. Since there are no convention centers that we can use locally, twice we had to do it in Rochester, New York. How our community have wished for a convention center or arena with the seating for at least 5,000 people and hotels over the years. (Philips\_TS5\_058)

**Response:** Comment noted.

**Comment 19:** Long Island needs this for several reasons. 1) The Nassau Coliseum is not a top notch facility unless you consider New Kids on the Block and minor league NBA basketball to be the type of acts you want to see on a regular basis. 2) No arena can survive without infrastructure to support it. (Kerr\_016)

**Response:** Comment noted.

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**Comment 20:** Belmont Park doesn't exist just for the residents of Elmont just as Jones Beach and Robert Moses Beaches don't just benefit those in Wantagh or Babylon. For the benefit of ALL, some will occasionally need to sacrifice otherwise nothing will ever get done. (Kerr\_016)

**Response:** Comment noted.

**Comment 21:** More people would come to Islanders games if the arena was actually meant for hockey, which the Barclays Center was not. (Finnegan\_008)

**Response:** Comment noted.

**Comment 22:** With regard to Elmont, there was a 2008 Elmont Community Vision Plan, which some of those aspects the residents want incorporated into the FEIS, which are—residents want to extend the areas in the retail portion of the project that would be used by locals. Residents want to promote the Belmont Park area and have more community involvement. (Marshall\_TS5\_087)

**Response:** Comment noted.

**Comment 23:** Several key parts of the New York State 2018 Opportunity Agenda mentioned the very principles that we are trying to uphold, including improvements to our infrastructure, expanding community access to open space, and protecting our resources, like water. We hope to work with the governor's office and ESD to ensure that these goals come to fruition for all communities across the state and particularly in Elmont. (BPCC\_114)

**Response:** Comment noted.

**Comment 24:** The land being used for the arena project has been an eyesore for years. The public parks near the racetrack are in major need of renovation. I'm happy to hear that funds are being allocated to address that issue. (Tyburski\_148)

**Response:** Comment noted.

### ***COMMUNITY BENEFITS***

**Comment 25:** The Islanders do a tremendous amount for the community; they have been supporting Long Island schools, hospitals, fire, and police institutions since 1972. They take all the concerns seriously. (Boudreau\_151, Ledecy\_TS5\_059, Lillibridge\_TS5\_078, Sokol\_TS5\_067, Goldberg\_201)

**Response:** Comment noted.

**Comment 26:** Some say this project is not geared towards Elmont. I'm left to theorize that this means that our population cannot possibly afford the retail and restaurants that



may be coming with this investment. Well I'm here to say that this is the best part of the deal. We are eager to see shoppers from all over the globe coming to Elmont to spend their money and we understand the benefits of increased economic activity. (Gordon\_143)

**Response:** Comment noted.

**Comment 27:** The local communities utilize the North and East Lots for excess snow removal activities and temporary refuse disposal such as trees after a declared emergency such as Hurricane Sandy. The local communities, especially the Village of Floral Park, must continue to receive unlimited access to those parking areas in the future. (McEnery\_180)

NYAP should be responsible for providing sufficient parking within its own area without regard to other portions of the Belmont Park campus. A 'shared parking agreement' may have a significant adverse impact on the Village of Floral Park and even be a violation and interference to the intra-municipal agreement already in place relating to the temporary placement of snow and refuge during an emergency situation due to snow or storms. (McEnery\_180)

**Response:** The North Lot would continue to be owned by the State and leased to the New York Racing Association (NYRA). ESD does not control the North Lot. Whatever arrangements that the State or NYRA have with Floral Park regarding use of the North or East Lots are not intended to be affected by the Project. The Franchise Oversight Board (FOB) informed ESD that it does not have any agreement with the Village of Floral Park regarding the use of the North or East Lots. NYRA and NYAP would be entering into a Parking Agreement that includes the North and East Lots.

**Comment 28:** The fact that ESD is not able to articulate one specific benefit to the Village of Floral Park and its residents is telling. Both of the parks slated for improvement are located outside of Floral Park, which has to maintain acres of park and recreation space on its own. If ESD and NYAP are to be fair and balanced, based upon the public comments and input to date, over half of the community benefits, such as over 5,000 sf of the 10,000 sf of community office space, must be set aside for Floral Park community-based organizations. (McEnery\_180)

**Response:** At this time there is no program specified for the Project's community space.

#### *PROPOSED PROJECT SCALE*

**Comment 29:** The ESD has not listened to the community's concerns regarding the size of this project. At the July 8th meeting, ESD representatives spoke of how they had scaled back the project in response to community opposition. However: a) During the scoping stage, the proposed arena was 660,000 sf, now it's 745,000 sf (an

increase of 85,000 sf); b) The hotel was 193,000 sf, now it's 210,000 sf. Some areas were made slightly smaller but the overall magnitude of the project is still larger than in the scoping document. The changes increase the number of potential visitors and decrease the available parking for those visitors. The number of events to be held at the arena has increased to more than 300 each year. Add in the retail village and hotel, and tens of thousands of people could come to Belmont almost every day. This project may now be the largest single development in Nassau County history. (Baggott\_162, Cohen\_145, Martinez\_140, Ronan\_126, VFP\_TS5\_088)

**Response:** Changes in the Project have been thoroughly identified, analyzed, and described in the FEIS. Please see Chapter 1 and the response to Comment 1-49 in Chapter 22.

**Comment 30:** The retail would be reduced from 350,000 gross square feet (gsf) to 315,000 gsf. That's 10 percent of the square footage. Peanuts. No change. That's still a big mall. (Gunther\_TS5\_095)

Even at 380,000 sf of the retail and office space combined that makes it half the size of Roosevelt Field. (Ronan\_TS5\_096)

The size and scope of this project are still too massive to be integrated into the surrounding communities in a positive way. The size of the project poses threats to safety, access to timely emergency services, air and water quality, traffic patterns, and quality of life for all of our neighborhoods. (Lyons\_146)

**Response:** To clarify, Roosevelt Field Mall contains approximately 2.37 million square feet of retail space, which is over six times the size of the proposed retail village. 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. 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 number of arena seats—which drives visitation—has not changed, nor has the contemplated number of arena events. 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), but the overall height has decreased, and the number of hotel room keys—which drives visitation—has not changed. The amount of retail has decreased by 85,000 gsf since the Draft Scope. With respect to the anticipated visitation, please see the response to Comment 1-58 in Chapter 22, "Response to Public Comments," in the FEIS.

**Comment 31:** New York Arena Partners have shown unprecedented levels of commitment to the community by listening to each of their concerns and making adjustments to the project's size as needed. (Isserlis\_041)

The Arena partners have done all that has been asked of them and have reduced the project to accommodate the concerns of the public. (Finnegan\_008)

**Response:** Comment noted.

**Comment 32:** The proposed hotel will have a significant amount of "convention space," which is in addition to the 250-room hotel operation, as well as the ability to construct a rooftop "penthouse experience" as well as a gigantic sign on top of the hotel, making it even higher than the 150 feet in height ESD is claiming. Therefore, 400 dedicated parking spaces for a potential highly visited Hard Rock Casino and Hotel may well count visitors in the thousands each day, and not just 250 hotel guest room visitors. (McEnery\_180)

One of the reasons that the "creation of a gateway to Long Island by creating a striking new presence for the town, county, and region" is that the height of the proposed 150 feet hotel, plus an unaccounted for 'penthouse' as well as signage over and literally above that will forever change the skyline and permitted height of structures in the targeted area. While members of the Floral Park Belmont Task Force were assured that the height of the proposed hotel would not exceed the 105-foot-high grandstand, once again that has been proven to be false. At least the final FEIS must put an absolute 150-foot ceiling on all construction and the noted 'penthouse' and/or signage must not be permitted to exceed the woefully out-of-proportion 150-foot false 'ceiling' which the NYAP and ESD continue to promote in their public comments. (McEnery\_180)

**Response:** As described in the Chapter 1, "Project Description," of the FEIS, the tallest element (exclusive of mechanical space) would rise to a maximum height of approximately 150 feet. Mechanical equipment, mechanical penthouses, and similar construction enclosing equipment would be less than 12 feet in height as measured from the roof upon which they are located and would not occupy more than 30 percent of the area of the roof. All signage for the hotel would be within the sign zones depicted in the Project's Design Guidelines, which do not exceed the 150-foot height of the hotel. Additionally, as noted in the FEIS, conference and ballroom facilities have shifted from the hotel to the arena. This special event-type use would draw up to approximately 700 attendees, and 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 in the EIS). Video lottery terminals (VLTs), table games, pari-mutuel, simulcast wagering, casinos, and horseracing were specifically excluded from further consideration in the Developer RFP and are not part of the Proposed Project.

*SITE MANAGEMENT, SAFETY, AND SECURITY*

**Comment 33:** An eight-foot hedge is an insufficient barrier between the North Lot and adjacent homes and the school. (Alfonsi\_TS5\_086, McClintock\_TS5\_080, Paterno\_TS5\_068)

Use of the North parking lot will create a substantial light and noise impact to the adjacent residential homes and Floral Park-Bellerose School. Mitigation as outlined in the FEIS in no way will effectively mitigate these impacts. A substantial physical buffer a minimum of 200 feet in width must be provided by NYAP. The buffer must consist of a high earthen berm with substantial mature plating to absorb sound. This buffer must extend from the south side of the LIRR tracks to 500+ feet south of Mayfair Avenue. NYAP must be required to fully fund noise abatement to the Floral Park-Bellerose School in the form of sound proof windows and complete central air conditioning. (Baggott\_162)

The Site B buffer zone of 150 feet should become a minimum setback for the entire Belmont Park campus, including its northern boundaries. A buffer zone of 300 feet, or a football field space, is also requested as preferred. (McEnery\_180)

**Response:** The EIS did not identify significant adverse impacts that would require additional distance/buffer between the North Lot and adjacent communities or other measures requested by commenters. 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, generally following the property line between the North Lot and the Floral Park-Bellerose School. Additional fencing with privacy screening would be provided 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. As described in Chapter 13, "Noise," 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. Please also see the response to Comment 2-17 in Chapter 22 of the FEIS.

**Comment 34:** The design and materials of such new fencing as well as the vegetation needs to be in place at the commencement of the construction, rather than at the end. The vegetation should be of a variety, such as the Holly Ilex, which remain with leaves and vegetation the entire year, and not just starting in the spring, that as installed are at least 8 feet high. The Village of Floral Park architectural review board should be consulted and consent to all such materials and planting adjacent and

bordering Floral Park, including those bordering all school areas, which are just the property owners rather than the municipality with such authority and jurisdiction. (McEnery\_180)

**Response:** 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 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. NYAP would consult with the Floral Park-Bellerose School regarding materials and plantings. Fencing would be provided prior to NYAP-related improvements to the North Lot.

**Comment 35:** The addition of the North, South, and East Lots to serve the Project for parking is a significant change. One way to ensure that the Village of Floral Park is provided with the direct benefit of paid parking in areas outside the 43 acres the ESD’s RFP contemplated, as well as insure absolute compliance with the “no tailgating” provision including public drinking and unnecessary car horn use, is for the State of New York to enter into an intragovernmental agreement with the Village of Floral Park so that the residents of Floral Park will obtain a direct revenue stream in relation to the Proposed Project. There is no reason the other tenant of Belmont Park, the now privatized NYRA, should obtain an additional direct revenue stream from non-racing events or other non-racing operations taking place on the Belmont Park campus. (McEnery\_180)

While safety and security are the responsibility of the Project applicants, their history at Nassau Coliseum indicates a long tradition of parking lot noise, drinking and loitering numbering in the hours before and after area events. (McEnery\_180)

**Response:** The State (not ESD) will continue to own the North, South, and East Lots and lease them to NYRA. NYAP and NYRA would enter into a parking agreement regarding NYAP’s use of the lots. The Memorandum of Environmental Commitments (MEC) sets out requirements regarding tailgating, public drinking, and horn use. The lease between NYAP and ESD requires that NYAP comply with all MEC requirements.

**Comment 36:** New York State Troopers, who have general and even specific jurisdiction over State-owned land, should be the primary law enforcement presence at Belmont Park, not just an occasional participant in major events. (McEnery\_180)

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Instead of a private security force, the State of New York and its state troopers need to have primary jurisdiction over the entire campus, with the North and East Lots having concurrent jurisdiction with the Village of Floral Park operating same as municipal parking facilities for all other events than daytime NYRA racing cards. (McEnery\_180)

**Response:** The Project Sites are wholly within the Hamlet of Elmont and the Town of Hempstead, and the Nassau County Police Department would be the lead law enforcement agency for the Project Sites.

**Comment 37:** Either NYRA or NYAP may well sell or delegate their obligations associated with the North or East Lots at any time. (McEnery\_180)

**Response:** The North and East Lots are owned by the State and are part of the leasehold premises ground leased to NYRA by the State in connection with NYRA's State franchise for pari-mutuel betting and thoroughbred horse racing. This prevents NYRA from delegating its obligations with respect to the North and East Lots without prior approval by the State. NYAP's obligations with respect to the North and East Lots would be set out in a parking agreement among NYAP, FOB, and NYRA. These obligations would be a covenant of the lease agreement between ESD and NYAP.

### *PILOT/DEVELOPMENT AND BUSINESS TAXES/PAYMENTS/COSTS*

**Comment 38:** We are concerned that the payment in lieu of taxes (PILOT) associated with the proposed project will diminish funding for schools in the Elmont Union Free School District, the Sewanhaka Central High School District and the Elmont Public Library District, as New York State sets limits on local property tax increases and forces localities to pursue PILOT agreements for development in their jurisdiction towards their tax cap calculation; therefore, this project's use of PILOT incentives has the potential to require Elmont to reduce the amount of taxes it levies for schools. The impacts of any PILOT incentive on local revenue generation and school funding must be thought through before any development begins, and local community members and officials must have a meaningful voice in decision-making regarding PILOT incentives that may undermine our own local control and revenue generation authority in the future. (BPCC\_114, Phillips\_TS5\_081)

**Response:** The revenues generated by the PILOT agreement would exceed the tax revenues currently generated from the site. Moreover, the Project would contribute to school district revenues without generating costs associated with an increase in school population. Please see Appendix I, "Fiscal and Economic Benefits," of the FEIS.

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**Comment 39:** Bellerose Terrace, Bellerose Village, and the Village of Floral Park all share the northern perimeter of the proposed project and two out of the three schools that serve this area directly border Belmont Park and will be impacted by the Project. Will any PILOT payments be directed to the Floral Park-Bellerose School District, Bellerose Terrace Fire Department, Floral Park Fire Department, or the Floral Park Police Department? (Baggott\_039)

**Response:** None of the taxing jurisdictions identified in the comment fall within the area encompassed by the Proposed Project. Accordingly, no PILOT revenues would be distributed to those jurisdictions.

**Comment 40:** What is the appraised value of the land within Site A, Site B, and the North Lot? Response to Comment 1-111 in the FEIS states “The transaction between ESD and the Applicant is a fair market transaction confirmed by appraisals received by ESD.” (Baggott\_039)

**Response:** Summaries of two independent appraisals for the Project Site have been included in the Directors’ Materials for the consideration of the authorization of this Project. These appraisals support a fair market transaction.

**Comment 41:** The majority of the revenue estimation is highly reliant on tax revenue from employees. What happens when the new retail village loses all of its tenants like the Source Mall in Westbury? Where will revenue come from then? (Talty\_153)

**Response:** Revenues would be generated by multiple Project sources; please see Appendix I, “Economic and Fiscal Benefits,” in the FEIS.

**Comment 42:** Debt service on stadium and arena financing depends 100 percent on attendance at the anchor tenant’s games. Non-sporting events are not part of that equation. This is straight out of S&P’s criteria for stadium and arena financing, and public or private, the criteria will be similar, barring pledges from the state. The Islanders were dead last this year, with average attendance of slightly less than 13,000 per game. This will make borrowing expensive. (BPCC\_166)

**Response:** 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. Irrespective of the success of the Islanders at the proposed area—which is speculative and outside the scope of this SEQRA assessment—it should be noted that NYAP would continue to have a PILOT obligation, would continue to host events at the arena, and would continue to support jobs at the arena and at other Project components.

*ANALYSIS FRAMEWORK*

**Comment 43:** What will happen with the people who live on Belmont grounds? Has anybody gotten any feedback from them? You will be intruding on their homes. (Amato\_119)

**Response:** The EIS considered the environmental effects from construction and operation of the Proposed Project on the Belmont Park dormitories. The FEIS concluded that there would be no significant adverse environmental impacts on residents within these dormitories.

**Comment 44:** ESD has avoided placing any meaningful or obvious estimate on the number of visitors who will partake of the “retail experience” of the new retail space. Woodbury Commons receives an estimated 13 million visitors a year, while Roosevelt Field has an estimated 22 million visitors a year, so even if the Bicester Village has half the visitors as Roosevelt Field, that is 11 million visitors, or over 30,000 visitors a day. (McEnery\_180)

**Response:** As described in Chapter 11, “Transportation,” of the EIS, trip generation estimates for the retail component of the Project were based on the *ITE Trip Generation Manual (10th Edition)*. Based on the 350,000 gsf maximum, it is estimated that approximately 7,650 patrons would visit the retail component of the Project on weekdays, and approximately 9,350 would visit on a weekend day. The retail projects cited by the commenter are not appropriate comparables for visitation given the difference in total size as compared to the retail component of the Proposed Project. Woodbury Common Premium Outlets contains approximately 850,000 sf of retail floor area, while Roosevelt Field Mall contains approximately 2.37 million square feet of retail floor area. Additionally, those shopping areas do not have comparable mass transit options.

**Comment 45:** What are the actual projections for “Black Friday” the day after Thanksgiving, which may well rival a non-triple crown Belmont Stakes day, as well as other intensive “sale days” at the proposed Bicester Village retail experience? (McEnery\_180)

**Response:** Similar to Belmont Stakes day, “Black Friday” is a unique event that occurs once a year. It is not an appropriate day for analyses as baseline conditions for the Proposed Project.

*ESD ENFORCEMENT MECHANISMS*

**Comment 46:** What damages or measures will be taken if NYAP fails to meet its obligations with respect to the TMP in the years after the arena is built and opened? (Baggott\_039)



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**Response:** TMP enforcement would be provided for in the lease and the MEC.

**Comment 47:** The proposed project excludes gambling and wagering for a casino type activity without explicitly banning them for any duration of time. Please revise the proposal to ensure a subsequent one does not involve bringing a casino into the area. (Weissman\_TS5\_062)

The proposed arena could give way to a casino use in the future. (BPCC\_165, Fattorini\_209, McEnery\_180)

**Response:** The following uses are prohibited during the term of the lease and all renewals: VLTs, table games, pari-mutuel, simulcast wagering, casinos and horseracing.

**Comment 48:** The State must place an absolute cap on retail development at the Belmont Park campus to be 435,000 gsf, which is the highest amount of space that has been studied and commented upon. As for the scaling down of the retail operations, that is indeed applauded but that should also become a fixed maximum, rather than the initial minimum amount of retail space that is permitted at the Belmont Park campus. It would be ridiculous should NYRA, the other current tenant at Belmont Park, turn around and lo and behold propose a similar amount of new retail operations to make up the “shortfall” indicated in the scaling back from the DEIS and FEIS NYAP proposals. ESD should place a ceiling on the amount of retail space that will be permitted on the entire Belmont Park campus, and not just Site B as has been proposed. (McEnery\_180)

**Response:** The Project’s GPP stipulates a maximum amount of retail uses on Sites A and B of approximately 350,000 gsf. This comprises up to approximately 35,000 gsf of retail, entertainment, and dining uses on Site A, and up to approximately 315,000 gsf of destination retail uses on Site B. The State owns the Belmont Park Racetrack campus that is ground leased to NYRA for its franchise for thoroughbred horse racing and pari-mutuel betting uses only. Any additional retail development at Belmont Park would require a separate approval and would be the subject of its own SEQRA review.

**Comment 49:** It is highly doubtful that the noted parking facilities will be able to handle and absorb the parking demands during multiple events and a high volume shopping day taking place within a short period of time. Therefore it is urged that ESD include in the mitigation plans some penalties or costs should the parking prove to be insufficient. This includes the creation of additional tiered parking facilities within Site A and/or Site B. (McEnery\_180)

**Response:** Chapter 11, “Transportation,” of the FEIS demonstrates that on-site parking would be adequate to accommodate the peak parking demand for the Proposed Project and the racetrack. The new LIRR station and the demand management strategies in the TMP would further reduce this demand. The TMP and other

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Project commitments would be enforced through the MEC and would be a requirement of the lease.

**Comment 50:** The MEC currently does not require the consent of the Village of Floral Park, which should have its own chair at the table instead of watching out for other entities to protect its own interests. (McEnery\_180)

**Response:** Tenant's compliance with the MEC is a lease covenant. ESD is responsible for enforcement of the lease. The Village of Floral Park is not a party to the lease.

### **LAND USE, ZONING, AND COMMUNITY CHARACTER**

**Comment 51:** I hear many residents of other communities saying Belmont will radically change to character of their community but what they are missing or do not appreciate is that for Elmont this change is a welcome one. I don't expect my neighbors to sacrifice what they think to be best for their community by commiserating with Elmont's challenges. But I believe it should be part of the conversation and should never be discounted. (Suaby\_TS5\_075)

**Response:** Comment noted.

**Comment 52:** Everything that was in the 2008 Elmont Vision Plan is a part of this project. (Johnson\_101)

The proposal addresses some of our desires and vision plan. We wanted retail space. New York Arena Partners' plan has retail space. We wanted a hotel. New York Arena Partners has a hotel. Our voices have been heard. Please, on behalf of the Elmont Community for Sustainable Development, move forward. (Smith\_TS5\_108)

**Response:** Comment noted.

**Comment 53:** I heard this group talk about a 2008 vision plan, but those plans aren't legally binding, and a vision is just a vision, it doesn't have to be financially worthwhile. They had decades to try other projects and it couldn't get done. (Goldberg\_201)

**Response:** Comment noted.

**Comment 54:** This area is also almost completely isolated from nearby residential areas. With this in mind, I believe that the concerns of local residents will be squashed in due time after observing that their neighborhood has not been negatively impacted at all. (Grappone\_014)

**Response:** Comment noted.

**Comment 55:** I know so many people, especially millennials, who want this project to give the neighborhood vibrancy, distinction and places to go instead of always heading out to the City for leisure, food options or common neighborhoods on the Island. The project's primary objective is giving economic activity to Elmont. Long Island needs change and development or else the population would continue to decrease and remain older. (Johnson\_101, Johnson\_TS5\_106)

**Response:** Comment noted.

## **COMMUNITY FACILITIES AND UTILITIES**

**Comment 56:** A detailed analysis of the DEIS was submitted by the NCDPW Divisions of Planning & Engineering. It poses many questions that were not answered in the FEIS, and also points out the many flaws in ESD's data and projections. Please review the Nassau DPW comments (FEIS Appendix L, pages 13-23). Then please let us know how you will resolve the DPW's concerns about natural gas, water supply, the electrical substation, and storm water drainage, among many others. (Ronan\_126)

**Response:** NCDPW comments, documented in Appendix L, have been responded to in Chapter 22, "Response to Public Comments," of the FEIS. Additionally, following ongoing consultation with NCDPW prior to the issuance of the FEIS, NCDPW provided a follow-up letter (see Appendix M) which states, "The County appreciates the efforts of the [ESD] project team to address the concerns outlined by the Nassau County Department of Public Works in comments filed on the [DEIS] earlier this year, focusing on transportation, stormwater and drainage, land use and zoning, and other aspects of the environmental review...We also note that our concerns about the other technical areas, including stormwater and drainage, have been addressed to our satisfaction."

## ***POLICE, FIRE, AND EMERGENCY SERVICES***

**Comment 57:** Regarding FEIS Chapter 22 responses to Comment 3-1 and 3-7, ESD and NYAP fail to recognize the significant adverse impact the Project will have on the municipal services of Floral Park. The police and first responders in Floral Park have with specificity outlined the adverse impacts that may be anticipated and for these to be all but ignored makes this FEIS unsupportable to move forward unless corrected. (McEnery\_180)

**Response:** The FEIS does not identify the potential for a significant adverse impact on municipal services of Floral Park.

*ELECTRICAL SUPPLY*

**Comment 58:** The Village of Floral Park, the four incorporated Villages of Bellerose, South Floral Park and Stewart Manor, and potentially the Hamlet of Elmont parking district should be provided a municipal utility operating a clean energy facility to provide a stand-alone microgrid servicing the operations of the entire Belmont Park campus, including the projected 15 megawatt requirements of NYAP, and the energy needs of all the customers within the four villages and the neighbors of Belmont Park in the Hamlet of Elmont. The surrounding communities need to be provided revenue streams to cope with this transformative megaproject, which is slated to create and generate revenue streams in the tens of millions of dollars annually for at least the next 50 years, in addition to providing a safe, reliable, and affordable energy supply. By establishing a municipal utility, not only will a microgrid protect the local area from the impacts of global climate change and potential catastrophic power outages or cyber attacks, it will allow local officials to shift funding of local municipal government from overdependence on property taxes. (McEnery\_180)

Claims that clean energy was ‘not contemplated’ is untrue, as the clean energy facility at Belmont Park has been publicly discussed for a number of years especially by emeritus mayor Thomas Tweedy of Floral Park. Even the most basic of google searches would have disclosed this fact, which raises the question just how thorough the NYAP review of local needs has been, especially in relation to its closest neighboring community of Floral Park. (McEnery\_180)

In light of the natural propane gas tanks now being proposed in order to ‘work around’ the current gas line being held up, there now needs to be such an evaluation done in comparison to the NYAP current proposal to truck in huge propane tanks after every arena event. The creation of a clean energy facility will enable the entire campus as well as the hosting communities both their energy needs and peace of mind. (McEnery\_180)

**Response:** The RFP sought an economic development project. A microgrid energy generation facility was not a requirement of the RFP, is not a component of the Project, and the impacts of such a facility were not examined in the FEIS.

**Comment 59:** What will these dedicated power poles located in Floral Park look like? Will they be similar to the ones presently in Eastport, the Pine Barrens and Riverhead: 80' high, 9' circumference reinforced steel poles? Will these structures convey high-tension power lines from a new substation at the LIRR Mainline down Plainfield Avenue to Belmont Park? The details of this conveyance and the power requirements must be disclosed to the public and our elected officials for review and comment before the project gets the go ahead by the ESD. (Reisig\_194)

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**Response:** The new riser poles on Plainfield Avenue (within the Belmont Park property) would be 70 feet tall above grade, with a 22.4-inch structure ground line diameter. These poles would be made of wood, and would convey high-tension power lines from the proposed electrical substation. Eight wooden replacement transmission poles along Plainfield Avenue would be 50- 70 feet above grade with 14"-22" diameters at ground level.

**Comment 60:** We have concerns regarding the lack of arrangements with PSEG and National Grid for additional utilities for the arena. (Barry\_195)

**Response:** Appendix A of the FEIS contains all correspondence with PSEG and National Grid. Please also see the responses to Comments 3-27 and 3-34 in Chapter 22, "Response to Public Comments," of the FEIS.

### *NATURAL GAS SERVICE*

**Comment 61:** The April 3rd submission addressed a March 27th Newsday article that demonstrated the DEIS' assumed use of natural gas to support the NYAP project's operations was infeasible. NYAP almost certainly knew about the likely lack of available natural gas capacity before the DEIS was issued. The DEIS' reliance on natural gas in Chapter 3 to address the proposed project's impacts on community facilities and utilities was misleading. (VFP\_214)

Despite ample evidence at the time suggesting that natural gas would not be available to the project, the DEIS nevertheless assumed that project operations would be supported by natural gas. Now that National Grid has formerly announced a moratorium on new natural gas supply, the FEIS proposes to replace natural gas with two 30,000 gallon liquefied petroleum gas (LPG) tanks. The FEIS fails to even attempt to assess environmental and safety concerns associated with adding 60,000 gallons of LPG storage facilities in a densely populated area, including safety concerns associated with transporting LPG to these facilities by truck on local roads. (VFP\_214)

There is concern about safety, security, and the environment associated with the possible installation and use of below-grade LPG tanks at the Project Sites. Where is the letter/memo from the Department of Homeland Security regarding this matter? Where is the Safety Act Verification letter? Why didn't ESD hold a community meeting to discuss these potential risks? (Emmel\_100, BPCC\_166, Smith\_213)

How is gas going to be supplied to the new arena. The applicant is planning on storing propane gas. This is dangerous to the community. It is estimated that there will be 60,000 gallons of propane for every event. This is not safe. (McGuire\_191)

In an attempt to solve a shortage of natural gas, NYAP has proposed burying a pair of 30,000-gallon tanks on the site and filling them with propane. It is

anticipated that one tanker truck delivery would be required after every event in the proposed arena. Those tanker trucks will access the site 220 times per year through the side streets of Queens. (Emmel\_100)

**Response:** The installation and operations of an LPG system for the Project would be approved and conducted in accordance with the Fire Code (2015) of New York State (NYS Fire Code) and/or the Nassau County Fire Prevention Ordinance (NCFPO), which each provide a comprehensive regulatory framework for the storage, handling, transportation, and use of LPG systems. The NYS Fire Code and NCFPO both incorporate, and mandate compliance with, the standards of National Fire Protection Association (NFPA) 58, which is also known as the Liquefied Petroleum Gas Code. NFPA 58 is a recognized industry benchmark for safe LPG storage, handling, transportation, and use, which imposes standards that mitigate risks and ensures safe LPG installations, to prevent failures, leaks, and tampering that could lead to fires and explosions. The design and installation of the LPG system for the Project will be completed in coordination with the appropriate regulatory party having jurisdiction, including OGS, the New York State Office of Fire Prevention, and/or the Nassau County Fire Marshal (NCFM). Trucks delivering LPG to the Project Sites would also be subject to the requirements of the NYS Fire Code and/or NCFPO (if applicable), and would not travel through the side streets of Queens. All LPG delivery trucks would be required to use designated truck routes such as Hempstead Avenue and Jamaica Avenue, which are not side streets. In addition, while there may be up to 220 arena events throughout the year, LPG usage will vary depending on the time of year and size of the event and, therefore, not all arena events would result in the need for an additional LPG delivery.

**Comment 62:** We would like to see the exchange with Homeland Security regarding the denial of the pipeline due to danger. We know there's an active lobbying campaign to approve the Williams Northeast Project. We want to acknowledge that pipelines are also prone to explosions. (Fraczek\_TS5\_061)

**Response:** Any correspondence with any agency or entity regarding the New York State Department of Environmental Conservation (NYSDEC)'s denial of the Water Quality Certification for the Williams Pipeline is outside the scope of this SEQRA analysis.

**Comment 63:** We know that an above-ground propane tank was opposed and just hearing from the Fire Department of Floral Park, it blows my mind that that would be proposed in the community. (Fraczek\_TS5\_061)

**Response:** The Project does not propose any above-ground propane tank(s).

## OPEN SPACE AND RECREATIONAL RESOURCES

**Comment 64:** Parents and other residents in Elmont have three parks available to us; Elmont Road Park, Henderson Avenue Park and Dutch Broadway Park. All of those parks are deemed by many to be unsafe for our children to play. This project, other than bringing much needed vitality and economic opportunities, will also serve as a means of renovating Elmont Road Park and Hendrickson Park since others were not able to do so. (Suaby\_TS5\_075)

The Elmont Park and Hendrickson Avenue Park redesigns are nothing for us to shrug our shoulders at for 49 years. (Capers\_TS5\_077)

The FEIS mandates investments in our parks. The intrinsic value of any community is inextricable tied to the success of the school district, the attractiveness of the community, the health of its business district and the quality of its open play spaces, etc. This project will have a positive financial impact on all of those elements. I want to ensure the children in Elmont are not robbed of the revitalization of these parks. For many years our pleas have gone ignored to refurbish those parks. Elmont Road Park especially is dangerous and unfit to be used by our children. (Gordon\_143)

We want a new Elmont Road Park for our children; the park is in shambles. (Johnson\_TS5\_105)

**Response:** Comment noted.

**Comment 65:** We still haven't seen the final proposals for the local park improvements. We want to see that in writing. (Kokura\_TS5\_076)

**Response:** While the GPP and the lease require improvements to Elmont Road Park and Hendrickson Avenue Park, the details of the specific improvements by NYAP will be developed in the upcoming months through consultation with the community and local elected officials.

**Comment 66:** The Elmont Road Park is made up of all but unbuildable land, and cannot support a regulation-sized lacrosse, football, or soccer field, or a regulation quarter mile track around same. Hendrickson Avenue Park is underutilized. Please consider replacing one of the designated parks with the ATS fields adjacent to the Elmont Public Library, where all of the public forums relating to this proposed project actually took place. (McEnery\_180)

The two off-site public parks proposed for improvements are maintained by the Town of Hempstead, while the directly impacted area is part of the Sewanhaka High School District. Floral Park's open spaces and parks, including Centennial Gardens in conjunction with the Floral Park Conservation Society, a not-for-profit organization, should be afforded the same support as the public spaces being

specifically supported at Elmont Road and Hendrickson Avenue by ESD and NYAP. Functional open spaces for the community have been overlooked. (Marshall\_TS5\_087, McEnery\_180)

Regarding FEIS Chapter 22 response to Comment 4-12, it is ironic that ESD and NYAP go out of their way to tout their engagement for public spaces at Elmont Road and Hendrickson Avenue, but when a similar observation is made relating to portions of the Belmont Park campus itself all of a sudden the ‘outside the scope of the EIS’ comment is invoked. (McEnery\_180)

**Response:** 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 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”). These improvements would benefit all residents of the Town of Hempstead.

**Comment 67:** There appears on the horizon the dismantling of the park-like settings of the Belmont Park backyard area, including the removal of the duck pond and its surrounding brick pathways, it is suggested that the materials be repurposed for a brick walkway to be created at Floral Park’s centennial gardens on the pathway bordering the dead end streets between Carnation Avenue and Floral Parkway. In addition, this area could utilize any decorative fencing removed from Belmont Park so that it can survive the demolition phase of the Project on Site A. (McEnery\_180)

**Response:** Comment noted.

## **VISUAL RESOURCES**

**Comment 68:** These signature properties should be architecturally significant buildings, not just reinforced concrete blocks devoid of any architectural relevance. But we have no idea what they will look like as in their haste to get these buildings constructed; utility and ease of construction will be the guide and inspired architecture will be lost. Can you imagine another \$1.5B development in NYS not having as part of its development package renderings of what the project will look like? (Reisig\_194)

How will the buildings relate with each other? Movement of people on the grounds, interaction with NYRA Grandstand and with the space and its component auxiliary buildings, walkways etc. The haste at which this project is going makes details easily overlooked, and details missed in design cost much more in time and money to fix later in the field. We get one chance to do this right



and we do not want to see architecture the causality of rushed improper planning. (Reisig\_194)

**Response:** The Project's Design Guidelines provide an overall framework establishing the design intent for the Project. The criteria within the Design Guidelines establishes the general parameters for creating a cohesive development, identifying the critical site and building components that will enable a successful project inclusive of building density and program; setbacks, access and visibility from surrounding streets and existing context; lighting; signage; parking; and open space. The specific architectural design of the Project's buildings is not necessary for the determination of environmental impacts under SEQRA. While the design of the Project has not been finalized, illustrative views of the Project are provided in Chapter 1, "Project Description," of the FEIS.

## **SOCIOECONOMIC CONDITIONS**

### *ECONOMIC BENEFITS*

**Comment 69:** The newly-released Fiscal and Economic Benefits Section (Appendix I of the FEIS) needs to be thoroughly and objectively analyzed. Even though the public was only given a very short period of time to review this new section, an objective assessment has pointed out ESD's tremendous overstatement of Project benefits claimed in the Fiscal and Economic Benefit Section of the FEIS in great detail. (VFP\_169)

**Response:** The Fiscal and Economic Benefits Section (Appendix I of the FEIS) was thoroughly researched and analyzed applying recognized methods and data.

**Comment 70:** According to Fiscal and Economic Benefits of Belmont Park Redevelopment Civic and Land Use Improvement Project, Town of Hempstead, NY by BJH Advisors LLC, the average salary for employees at the site will be \$41,030. How does this compare to current average salaries in the neighboring communities? Will employees making these wages be able to live in neighboring communities without being cost-burdened? If the RFP had included non-sports and entertainment uses that would offer higher wage jobs, could a similar economic impact have been achieved with lower levels of added congestion? (Baggott\_039)

**Response:** Assessments of living wages and salary comparisons are outside the scope of SEQRA.

**Comment 71:** In terms of jobs, let's hypothesize and assert, as the opposition does, that all the jobs will be low-paying jobs (ludicrous at best because it ignores the needs for retail and restaurant managers, grounds maintenance managers, etc., but let's explore for argument's sake). The net effect will still be jobs that we do not currently have for our young adults and seniors and anyone looking to start their

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working life. These may not be jobs to aspire to but how can we discount their overall value? (Witter\_142)

**Response:** Comment noted.

### ***POTENTIAL COMPETITIVE EFFECTS***

**Comment 72:** Does the Project have any commitments from any upscale anchor tenants given the proximity of Green Acres, Roosevelt Field, and Manhasset Americana? (Emmel\_100)

**Response:** Value Retail has been investing in, developing, and operating projects for some 30 years and have strong relationships with more than 500 upscale fashion brands around the globe. Value Retail would start targeting commitments from retailers following Project approvals.

**Comment 73:** The idea that local business will be hurt is ridiculous since most business in the area would not compete with anything available at the mall. (Arzooman\_007)

**Response:** Comment noted.

**Comment 74:** I am disappointed to hear some refer to the retail portion of this project as a “mega” mall. Perhaps it is necessary to review the definition of this word prior to using it again. (Johnson\_135)

**Response:** Comment noted.

**Comment 75:** ESD notes that the No Retail Village Alternative doesn’t significantly lessen the traffic. But that plan will help support local business groups and we know that a healthy business district supports a healthy community. At the current scale of this project, patrons will not be stopping in local bakeries or restaurants. They will be doing those on the Belmont campus. The campus is designed to bring in patrons and keep them there. The traffic will deter visitors from supporting the local businesses before or after any event. Hempstead Turnpike, Tulip Avenue, Jericho Turnpike, all host local businesses that could thrive with a reasonably sized project but not with one of this magnitude and these goals. (Smith\_TS5\_079)

**Response:** As detailed in Chapter 7, “Socioeconomic Conditions,” of the FEIS, 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. 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.

The EIS traffic analysis is based on a reasonable worst case scenario of a sold out National Hockey League (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 76:** Entertainment dollars are a finite universe. It does not automatically follow that locals will spend at the new arena and/or retail stores in preference to whatever they do now. And it certainly doesn't follow that arena employees will be local and will spend locally. Most projections of potential arena revenues are based on both those assumptions. (BPCC\_166)

**Response:** Regarding potential competitive effects of the Project on Nassau Coliseum, the Islanders announced they were leaving Nassau Coliseum on October 24, 2012. In order to retain the Islanders on Long Island, a new arena was required. Since this announcement, the Nassau Coliseum has requested and obtained public support in the form of Nassau County Industrial Development Agency benefits, whereby Coliseum owners provided assurances that the events business would be viable and sustainable without the Islanders, in a market that they understood would likely be in direct competition with a new Islander's home which would also double as a competitive location for non-hockey events. In addition, Coliseum lenders understood the risks to the downsizing and loss of the Islanders, yet approved debt for the arena's upgrade.

Relative to comparable dense urban areas such as Los Angeles, Detroit, and Chicago, the New York Metropolitan Statistical Area (MSA) has less "arena supply" on an arena-seat-per-resident basis. The New York MSA contains over 20 million residents in addition to workers and tourists who come to the area and consume arena offerings. The Los Angeles-Long Beach-Anaheim metro region has 5 major arenas with a combined capacity over 75,000. This averages out to 176 residents for every seat. Comparatively, with the proposed arena at Belmont Park, the New York MSA would have 225 residents for every arena seat, still notably higher. Both the Coliseum and Belmont have been underwritten by lenders and equity investors, who have identified a need for additional arena capacity.

Regarding potential competitive effects on local retail uses, please see the response to Comment 75, above, and the response to Comment 7-15 in Chapter 22 of the FEIS.

## **WATER RESOURCES**

**Comment 77:** We've learned that the developers—there was a development of a parking lot from the church in our neighborhood that impacted the sump that's on Dutch Broadway to flood because there are no sponges—in order—the sponge for the water doesn't allow the water to go down. So this was for a parking lot for a church. Imagine the magnitude for the arena. (McDonald\_TS5\_094)

Tonight, along with our neighbors at Hickory Street and Cedar Place, we are in the process of bailing and mopping as the result of yet another flood. The street had to be closed, sewer covers dislodged; cars had to be moved to higher ground as we watched the water rise. The drainage plan completions were put on hold because of the proposed development at Belmont. A question regarding the increased runoff from the community and the arena, hotel, and retail space needed to be addressed. Where is the answer to that question? (Trentacoste\_113)

**Response:** As detailed in response to Comment 14-8 in Chapter 22 of the FEIS, as 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.

**Comment 78:** There have not yet been any clear discussions about how the additional infrastructure upgrades necessary to supply this sustained surge in water use will be financed. Consider, for example, the 2008 Belmont Stakes that left many residents without water. It would be unacceptable for residents of the area to have to bear the burdens of increased water prices, water scarcity, and stress on the sewage system because of a project that we explicitly do not want in the first place. (BPCC\_114)

**Response:** As detailed in Chapters 3, "Community Facilities and Utilities," and 22, "Response to Public Comments," of the FEIS, NYAP would coordinate with the Water Authority of Western Nassau County (WAWNC) with respect to the installation of a new privately funded water main 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. 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. On August 6, 2019, WAWNC issued a letter that water service would be available for the Project. It is also noted that 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.

**Comment 79:** The FEIS states that the Proposed Project is expected to have an average daily water demand of 135,925 gallons per day (gpd), excluding irrigation. The FEIS also states that Long Island is considered a Sole Source Aquifer region, which means that groundwater is the single water supply source. The FEIS fails to state that the entire length of Long Island is a Sole Source Aquifer identified as United States Environmental Protection Agency (EPA) SSA22/Federal Register ID 43 FR 2661. The New York State water quality standards program is a state program with federal (EPA) oversight. New York's longstanding water quality standards program predates the federal Clean Water Act and protects both surface waters and groundwaters. I would like to be able to review:

1. Correspondence, studies and any other records between NYAP, ESD, or AKRF with EPA and NYSDEC demonstrating that the withdrawal of such large quantities of water from SSA22 will not result in the existing water quality in the area surrounding Belmont Park to be degraded.
2. Correspondence, studies and other records between NYAP, ESD, or AKRF with NYSDEC indicating that the withdrawal of such large quantities of water for SSA22 comply with New York's statewide antidegradation policy (September 9, 1985).
3. Correspondence, studies and other records between NYAP, ESD or AKRF with NYSDEC indicating that the project has met the requirements of the State Pollutant Discharge Elimination System (SPDES) permit process and that a separate SEQRA action was not required in order to meet SPDES.
4. Correspondence, studies and other records between NYAP, ESD, or AKRF with NYSDEC Region 1 regarding the necessity to obtain an environmental permit under the Long Island Well Water Withdrawal Program, which regulates water supply withdrawal with a capacity of 100,000 gallons per day or more.
5. Correspondence, studies and other records between NYAP, ESD or AKRF with the Water Authority of Western Nassau County leading to: (a) determine the rate of spread of the plume of chemicals of concern in SSA22 once the Belmont Park Project comes on line; and (b) the likely capital and ongoing

maintenance cost to install and operate the equipment needed to remove chemicals of concern from the drinking water.

6. Correspondence, studies and other records between NYAP, ESD or AKRF and any other individual or entity that established that the initial and long term costs to mitigate the spread of contaminated water is outweighed by the benefit of the project to the people of New York. (Sexton\_168)

**Response:** The designation as SSA22 is EPA’s specific designation for the Nassau County and Suffolk County portion of the Sole Source Aquifer. While Brooklyn (Kings) and Queens Counties are also part of Long Island’s Sole Source Aquifer, these counties are separately designated as SSA21 by EPA. As part of EPA’s Sole Source Aquifer program, if a project is receiving federal financial assistance, EPA is required to review all projects that fall within the designated area to ensure the protection of groundwater resources. The Proposed Project is not receiving federal financial assistance; therefore, EPA does not have review authority in this case. All required and applicable permits and approvals in furtherance of the Proposed Project have been or would be obtained at the appropriate time. With respect to requested correspondence, the requests are outside the scope of SEQRA.

## **TRANSPORTATION<sup>1</sup>**

### *TRAVEL DEMAND ANALYSIS*

**Comment 80:** There were literally thousands of vehicle trips that just disappeared in the DEIS transportation analysis. No one knows where those ended up. The reason is the Cross Island Parkway is already at capacity during peak periods and we don’t find out from the analysis where the vehicles associated with this project will go. (Ronan\_126, VFP\_TS5\_088)

**Response:** Detailed traffic volume maps showing the project-generated vehicle trip increments at intersections on the local street network and the Cross Island Parkway were summarized in Appendix F of the EIS. As discussed in Chapter 11, “Transportation,” in instances where the results of the VISSIM micro-simulation model showed that there would be “unserved vehicles,” or unmet demand, these vehicles would be processed outside of the peak hour and would result in additional congestion beyond the peak hour on the Cross Island Parkway.

**Comment 81:** In Chapter 11, Table 11-6 of the FEIS: Traffic analysis periods have not been expanded to include evening rush hour traffic in spite of numerous input Floral Park provided at the DEIS. Why not? (Gunther\_205)

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<sup>1</sup> See “Mitigation” section of this document for comments related to the new LIRR Elmont Station.

The response to comments provided in the FEIS includes Table 22-2, which provides a comparison of anticipated project generated trips with Existing Traffic volumes on the Cross Island Parkway and Hempstead Turnpike. While Table 22-2 indicates that the combined highest volumes are for 6:30 PM-7:30 PM for a Hockey Game, this does not necessarily equate to a worst case analysis for the Cross Island Parkway or for Hempstead Avenue. If the commuter peak hour and site peak hour do not coincide, as in this case, both peak hours must be studied to determine the impact to the transportation system. Notwithstanding the statements above, the TMP identifies methodologies for shifting arrival times to arena events earlier to alleviate congestion during the Hockey Game arrival peak. This further reinforces the need for a commuter peak hour analysis. Based on the information contained in Table 22-2 the TMP is recommending that measures be implemented to add even more traffic to the commuter peak than is currently projected without providing an analysis of that information. (VFP\_215)

FEIS Response 11-99 indicates that the queuing identified at the intersections of Plainfield Avenue and Tulip and Magnolia Avenues occurs during the commuter peak hour and not during the Arena peak hour and thus cannot be used as a direct comparison. While this may be the case, this reinforces the fact that a commuter peak hour analysis is necessary, as the congestion identified during the commuter peak hour was not considered in the analysis performed in the FEIS. (VFP\_215)

**Response:**

In Chapter 22, "Response to Public Comments," of the FEIS, numerous commenters stated that the DEIS should have analyzed an earlier weekday PM peak hour because Islanders games currently start at 7:00 PM, not 7:30 PM as analyzed in the DEIS. As described in Responses 11-33, 11-38, and 11-56 of Chapter 22, weeknight games at the proposed arena would start at 7:30 PM rather than 7:00 PM as 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 (Appendix F).

The FEIS analyzed the weekday PM peak hour of 6:30 PM to 7:30 PM, which is the peak hour that has the highest volume of project-generated trips and is also the peak hour that has highest total traffic volumes when project-generated vehicle trips are combined with existing background traffic volumes. The demand management strategy of the TMP to encourage some arena patrons to arrive to the Project Sites early is estimated to result in a minor shift of seven percent of arena patrons to arrive prior to the hour preceding the start of a weeknight hockey game. Even when this demand management strategy is considered, the 6:30 PM to 7:30 PM time period remains the weekday peak hour with the highest volume of project-generated trips and the weekday peak hour that has highest total traffic volumes when project-generated vehicle trips are combined with existing background traffic volumes.

**Comment 82:** In Chapter 11 of the FEIS, trip distribution and assignment: no change identified from the DEIS. How can this be possible given the addition of the LIRR Elmont Station? (Gunther\_205)

**Response:** The addition of the new LIRR Elmont Station is mitigation for the Proposed Project, and is therefore accounted for in Chapter 17, “Mitigation,” of the FEIS, which includes a discussion of updated travel demand estimates that were prepared for the proposed arena and non-arena uses to account for the new LIRR Elmont Station and the implementation of demand management strategies in the TMP.

**Comment 83:** The FEIS’ response to the comments regarding the use of a regional model (Comment Response #11-44) does not address the comments. Notwithstanding this office’s concerns with proposed mitigation measure of marking roadway ‘unavailable’ in Waze the use of a regional transportation model is even more appropriate given the plan to redirect traffic to other regional roadways in an attempt to reduce congestion on the Cross Island Parkway. A regional model is necessary to determine what routes these redirected vehicles will take and if the roadways will have the capacity available to accommodate the additional volume. (VFP\_215)

Many public comments on the DEIS questioned ESD’s failure to account for the fact that traffic generated by the Project will overflow off of the already overburdened Cross Island Parkway onto local streets. ESD’s response was essentially that patrons arriving by car will use the Cross Island Parkway because exits off of the Cross Island Parkway provide direct access to Belmont’s parking fields that will serve the Project. While it is true that two of the exits off of the CIP provide access to parking fields, ESD ignores the fact that access to parking for the new arena and retail mall, including the 1,500 parking spots on Site B (the mall), 1,150 parking spots on the South Lot, and 2,004 parking spots on the East Lot is available from Hempstead Turnpike (see FEIS Figures 11- 6, 11-7 and 11-8). Traffic will be diverted to local roads, supported by ESD’s own assumption that motorists will take the route that will provide them quickest access to arena or retail mall parking. In many instances, the quickest (especially when the CIP is overcrowded) and most direct route to parking at the Project will be off of Hempstead Turnpike. In those instances, local side streets such as Plainfield Avenue will be the most direct route to the site. Moreover, nearly all of the access to the mall parking is accessible from Hempstead Turnpike. ESD ignores the fact that exits from the mall (Site B) and the South and East Lots empty onto Hempstead Turnpike. Further, in both instances, ESD ignores that much of the Islander fan base and presumably a good percentage of the potential patrons of the mall will be coming from eastern Long Island. For those coming from the east, approaching the Project from local roads that lead into Hempstead Turnpike will not be more circuitous than any alternative highway or parkway route when the CIP is at capacity. Regional traffic models (i.e., the New York Best Practice



Model [NYBPM]) calibrated by cloud-based data such as Streetlight can readily analyze how vehicular traffic is most likely to approach the Project. Such modeling programs are available to perform this analysis. ESD should have utilized such traffic modeling programs rather than applying their own clearly flawed and biased assumptions and analysis regarding traffic impacts. (VFP\_169)

**Response:**

Regional traffic models are primarily planning tools which distribute traffic to all available routes and can optimize the flow of traffic within a network. If the methodology of using a regional traffic model to develop traffic assignments were applied to the Proposed Project, this would divert traffic away from congested roadway segments and result in the identification of fewer impacts at 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 traffic assignment methodology utilized in the FEIS is a more conservative approach because it assumes that project-generated traffic would travel along the most direct routes to and from the Project Sites and identifies the full potential impacts of project-generated vehicle trips along these travel paths and the types of mitigation measures that would be required to address these impacts.

As discussed in Chapter 17 of the FEIS, “Mitigation,” an extensive set of proposed mitigation measures have been developed to address the significant adverse traffic impacts that were identified, consisting of a new LIRR Elmont Station that would be added to the LIRR Main Line and implementation of a comprehensive TMP that includes a combination 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. 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.

While the FEIS acknowledges the potential that certain routes in the vicinity of the traffic study area may be susceptible to traffic diversions by drivers to avoid congestion, a key element of the TMP aimed at reducing the potential for traffic diversions onto sensitive local residential streets is for NYAP to partner with navigation app providers such as Waze to define local streets that could be designated as “unavailable” to through traffic during event arrival and departure periods so that through traffic would not be routed to them.

As discussed in the Demand Management Strategies of the draft TMP (Appendix J), regional origin-destination data for existing vehicles using the Cross Island Parkway were obtained from the StreetLight platform to estimate the extent to which background traffic could be reasonably re-routed via other limited access routes, and only a portion of these trips were assumed to be rerouted to other north-south limited access highways.

Regarding the comment that arena patrons coming from eastern Long Island would approach the project via local roads that feed into Hempstead Turnpike, please see Response 11-218 in Chapter 22, “Response to Public Comments,” of the FEIS.

*TRAFFIC ANALYSIS*

**Comment 84:** The FEIS still does not propose improvements to the Cross Island Parkway, but anticipates that relief will be provided via the introduction of the Elmont Train Station and implementation of the measures provided in the Transportation Management Plan. While this office has concerns regarding the viability of some of the proposed mitigation measures, even if the results presented in the FEIS are taken at face value, the FEIS still identifies up to 22 highway segments of the Cross Island Parkway as well as impacts to local roadways where significant adverse traffic impacts are un-mitigated. (VFP\_215)

**Response:** The FEIS identifies mitigation to the greatest extent feasible and practicable. Widening the Cross Island Parkway is not reasonably feasible as it would require reconstructing numerous overpasses and underpasses. Furthermore, ESD’s goal was to develop mitigation that would promote mass transit and reduce reliance on autos as a means of traveling to the Proposed Project. The FEIS does not state that all impacts would be mitigated and SEQRA requires only that all impacts be mitigated to the maximum extent practicable, consistent with social, economic and other essential considerations. Please also see the response to Comment 222.

**Comment 85:** On page 11-56 of the FEIS, regarding potential impacts of the proposed action: no adjustment has been identified to traffic along Red Road between the new Elmont LIRR Station and the arena entrance. a) At a minimum, shuttle bus traffic mentioned elsewhere in the FEIS would significantly affect circulation on this road. b) There is no mention of Belmont Park Road running along the border between the North parking and the VFP boundary. (Gunther\_205)

**Response:** Red Road is an internal road within the Project Sites that consists of two 24-foot-wide roadways (which can accommodate a total of four travel lanes) as well as an adjacent sidewalk. Figures 24 and 30 of the Operations Plan of the draft TMP (found in Appendix J of the FEIS) shows the roadway that would be used by shuttle buses and inbound rideshare vehicles along the northern perimeter of the North Lot.

**Comment 86:** Deliveries to the mall, concessions, arena, hotel, office buildings and all will be using residential streets. (Alfonsi\_TS5\_086)

How are all of the trucks that would supply the facility getting to the stadium and the surrounding shops? Through Floral Park I would imagine. More trucks, more traffic, and an end to walking safely through the Village. (McCarren\_217)

## Memorandum of Responses to Public Comments on the FEIS

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**Response:** Chapter 11, “Transportation,” of the FEIS describes the truck routes that would be used by vehicles making deliveries to the Proposed Project and how trucks would enter and exit the Project Sites via Hempstead Turnpike. This would not require all delivery vehicles to use residential streets.

**Comment 87:** The Belmont property is surrounded by roadways that prohibit commercial vehicles, including the Cross Island Parkway, the Grand Central Parkway, and the Belt Parkway, and the nearest north-south highway that accepts commercial vehicles—the Clearview Expressway—ends 3-4 miles from Belmont at Hillside Avenue. During the construction phase, a significant number of high-profile trucks carrying material and equipment will be required. Once the arena is built, it is anticipated that as many as 220 events will be hosted there per year. Most of those arena events will require multiple tractor trailers, luxury buses, and high-profile vehicles to transport stage equipment, lighting rigs and entertainers/athletes. The retail village it is sure to require daily deliveries. All commercial vehicles would be required to take side streets through Hollis and Queens Village, but the LIRR trestle clearance on 211th Street has a clearance of just 9'9". The trestle clearance at Hempstead Avenue is just 12'7". Since standard tractor trailers are about 13'6" high, how do commercial vehicles get from the Clearview Expressway to the Project Sites? Most commercial vehicles will be relegated to the Van Wyck Expressway before exiting at Hillside Avenue and traversing 6 miles through Jamaica, Hollis and Queens Village in order to reach the Project Sites. What roadways in Queens and New York City will be impacted by this influx of new traffic every day? Have any of the developers or public authorities involved in this project had the courtesy to convey this impact to the quality of life for residents of eastern Queens? (Alleci\_030, Emmel\_100, Fattorini\_209, Lockwood\_210, Reisig\_194, Saunders\_134)

**Response:** Truck routes used by construction vehicles were addressed in Chapter 15, “Construction,” of the EIS. Trucks traveling through Queens would be required to use NYCDOT-designated truck routes, which are not side streets. In the event that a truck greater than 12'7" in height were to approach the Project Sites from Queens, it could exit the Clearview Expressway at Hillside Avenue and travel along Francis Lewis Boulevard, Springfield Boulevard, and Hempstead Avenue/Turnpike, which is a distance of approximately 4.5 miles on the local street network. The operations plan of the draft TMP (Appendix J) includes a discussion of delivery and freight management for vehicles making deliveries to the Proposed Project, which notes that most deliveries to the retail village would be made by UPS and FedEx-style vans.

**Comment 88:** In Chapter 11 of the FEIS, there is no identified change to projected traffic on Plainfield Avenue; this is unresponsive to the DEIS critique comments identifying the need to update peak projected travel loads. (Gunther\_205)

**Response:** Chapter 22, “Response to Public Comments,” of the FEIS provides responses to all substantive comments received on the DEIS, and comments regarding traffic volumes on Plainfield Avenue are addressed in Responses 11-41, 11-50, 11-51, 11-89, 11-91, 11-184, and 11-228.

**Comment 89:** In Chapter 11, Table 11-28 of the FEIS, “With action weekday traffic levels” have been modified at the Plainfield/Jericho and Plainfield/Carnation intersections (AM Peak Hour changed to 43.7 and 21 respectively). This is not believable given the legal inability for Waze and other apps to divert traffic away from these roads when in fact they are neither closed nor able to be closed without permission from New York State. (Gunther\_205)

The FEIS says the TMP will “partner” with navigation apps providers (e.g. Waze) to define local streets that could be designated as “unavailable” to thru traffic during arrival and departure times. A) Plainfield Avenue, Tulip Avenue and Jericho Turnpike are State roads. Accordingly, how would the Village of Floral Park have the ability to protect its community from traffic overload? B) This is especially onerous with Plainfield Ave which bisects Floral Park. C) Others have commented to the illegality of assuming Waze and other apps have the ability to direct traffic away from these roads. In general, the FEIS has failed to solve the impending traffic morass via its faulty Mitigation plan. (Gunther\_205)

**Response:** Chapter 11, “Transportation,” presents traffic analyses for existing conditions, future conditions without the Proposed Project, and future conditions with the Proposed Project. Chapter 17, “Mitigation,” presents traffic analyses with traffic mitigation measures, including the strategy to partner with navigation app providers such as Waze to define local streets that could be designated within the app as “unavailable” to through traffic during event arrival and departure periods so that through traffic would not be routed to them. As noted in Chapter 17 of the FEIS, the list of unavailable local roadways would be coordinated with stakeholders as their “unavailability” within a navigation app must be requested by the entity with jurisdiction of the roadway.

**Comment 90:** In Chapter 11 of the FEIS, I seriously question the “key findings of the traffic level of service” which indicate a very minimal number of increases in traffic movements to the local street network when one considers the bus and truck traffic impacts from Project operations as well as during the construction period. No change is flagged to the DEIS listing of the six adversely affected traffic intersections. Why is this acceptable? (Gunther\_205)

**Response:** The traffic analysis in Chapter 11, “Transportation,” of the FEIS accounts for all types of vehicles that would be generated by the Proposed Project, including autos, trucks, and buses. As noted in Chapter 11 of the FEIS, close to 90 percent of the Project-generated traffic would use the Cross Island Parkway, not local streets. The traffic analysis includes an assessment of local streets as well as the

highway network. Construction-related traffic impacts are addressed in Chapter 15, “Construction,” of the FEIS; they are not comingled since construction and operations would not occur concurrently.

**Comment 91:** In Chapter 11 of the FEIS, potential for traffic diversions to local streets: no identified changes other than the weak reference in the Mitigation TMP to real time communication with Waze and other apps. (Gunther\_205)

**Response:** The potential for traffic diversions to local streets is identified in Chapter 11, “Transportation,” of the FEIS, and measures to reduce the potential for such traffic diversions are further detailed in Chapter 17, “Mitigation,” of the FEIS as well as in the Demand Management Strategies section of the draft TMP, provided in Appendix J of the FEIS.

**Comment 92:** In Chapter 11 of the FEIS, reference to possible night racing remains in the text; this could result in higher nighttime parking. (Gunther\_205)

**Response:** As discussed in Chapter 11, “Transportation,” of the FEIS, 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 only if the aggregate attendance for both events does not exceed the maximum attendance level for a sold-out hockey game (18,000 seats), the representative worst-case scenario studied in the EIS. With this restriction, parking demand for all uses would be met, even if night racing were approved by the New York State Legislature.

#### *PUBLIC TRANSPORTATION*

**Comment 93:** Jamaica Station is a main hub for LIRR. They should provide shuttle bus service from there to the proposed arena. (Gelfo\_127)

**Response:** As part of the TMP described in Chapter 17, “Mitigation,” of the FEIS, a shuttle bus route between the arena and Downtown Jamaica would be operated during arena events. This could be used by arena patrons as an alternate to the other public transportation services operating between Belmont Park and Queens, including LIRR service to the existing Belmont Park spur station and the new Elmont Station.

**Comment 94:** The transportation and the lack of a solution is really a problem. If the access to public transportation was ideal, the Barclays Center would have been the ideal home for the Islanders. But it wasn’t. (Lidnskog\_TS5\_097)

**Response:** The Barclays Center was not designed for hockey. Moreover, while the Barclays Center is served by the LIRR and numerous subway lines and bus routes, the Downtown Brooklyn location was not located near the Islanders’ fan base in Nassau and Suffolk counties. As described in Chapter 1, “Project Description,”

of the EIS, the new arena is expected to attract a wide audience of new and existing fans, due to its modern and innovative design, and due to it being centrally located at the border of New York City and Long Island. Additionally, the provision of LIRR service to and from points east and west would provide shorter travel times to the arena as it would be located closer to the Islanders' fan base.

**Comment 95:** What is the total cost of improvements that the Metropolitan Transportation Authority (MTA) has already made to the Belmont spur, and what are the operating costs for expanded service? (Fauss\_161)

What are the operating costs for the new Elmont station? In a December 2018 letter to ESD, LIRR President Phil Eng said it will require a "sustained source of funding in LIRR's operational budget." President Eng said in Governor Cuomo's July 8th release that there will be no capital cost to LIRR, but there will be new operating costs as the station will provide full-time, year-round service. Who will pay for any potential cost overruns for both capital projects? (Fauss\_161)

What are the total new operating costs for the MTA/LIRR for the new station and expanded service at the current Belmont spur? In a letter to ESD from December 2018, LIRR President Phil Eng seems to commit to additional service on the existing Belmont spur, yet notes that this will require a "sustained source of funding in LIRR's operational budget." The letter specifically notes that provision of service "does not include any capital improvements to LIRR Facilities or infrastructure, as there is no MTA or LIRR funding available for improvements in connection with the service." President Eng stated in Governor Cuomo's July 8th release that there will be no capital cost to LIRR, but does not speak to operating costs for the new station, which will provide full-time, year-round service. LIRR fares are already heavily subsidized, so ticket fares cannot be expected to make up the full cost. (Fauss\_197)

What is the total cost of improvements that the MTA has already made to the tracks to support additional passengers from the existing Belmont station? (Fauss\_197)

**Response:** The requested information is outside the scope of SEQRA.

**Comment 96:** Beyond the proposed LIRR station, are the changes to the FEIS to include more curb-cut outs and shelters sufficient for those who are more likely to ride the bus? This includes MTA or Nassau Inter County Express (NICE) buses, which already serve workers in this area. Workers at the arena are unlikely to pay for the higher-cost LIRR service. ESD's own FEIS on page 5 of the Transportation Section 9 notes that 12 percent of workers would take the bus, versus 2 percent who would take LIRR. Arena patrons would be the reverse - with 2 percent taking the bus and 12 percent taking LIRR. (Fauss\_197)

## Memorandum of Responses to Public Comments on the FEIS

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**Response:** The modal splits presented in Chapter 11, “Transportation,” of the EIS for arena employees are based on US Census data for workers that currently commute to the Census tract in which the existing Belmont Park Racetrack is located, including those that use buses. The addition of bus pull-outs along Hempstead Turnpike would represent improvements to the existing bus stops at these locations and would provide passenger amenities such as shelters and electronic schedule information.

**Comment 97:** In Chapter 11 of the FEIS, bus service “adverse impact” has been reduced to the more limiting time of “...after sold-out games,” unfairly limiting the quantification of traffic impacts on the neighboring community. (Gunther\_205)

**Response:** The analysis of the Proposed Project’s effects on bus service includes a sold-out hockey game at the arena as part of the representative worst-case analysis scenario. The description of the significant adverse impact to bus routes has been clarified in the FEIS to indicate that this would likely occur during sold-out games, as events with lower attendance levels would result in fewer Project-generated bus trips.

**Comment 98:** In Chapter 11 of the FEIS, LIRR Service: no identified changes since the DEIS. LIRR patrons remain at 12 percent and 7 percent. Why does this not address the impacts of the new LIRR Elmont Station? (Gunther\_205)

**Response:** The 12 percent and 7 percent in Chapter 11 reflect modal splits without the new LIRR Elmont Station as mitigation. The effect of the new LIRR Elmont Station on LIRR ridership is addressed in Chapter 17, “Mitigation,” of the FEIS.

### *PARKING*

**Comment 99:** The South Side of Hempstead Turnpike will have an additional 1,500 below-grade parking spaces underneath the shopping center. It must be presumed that the retailers will apply restrictions to their valuable underground parking areas to prevent them from being monopolized by Islanders fans? (Alleci\_028)

**Response:** While the parking below the retail village would not have restrictions that would prevent spaces from being used by arena patrons, most arena events would be held on evenings and would not coincide with the peak midday shopping period. Chapter 11, “Transportation,” of the FEIS shows that the amount of parking that would be provided on-site would be sufficient to accommodate the maximum parking demand generated by 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. During times of arena events and/or peak shopping periods, shuttle buses would be provided so that patrons would not have to walk unreasonable distances to parking and a shuttle bus route would operate between the retail village and the South and East Lots. As described in the operations plan

of the draft TMP (Appendix J), transportation operations on the Project Sites would be led by a full-time transportation manager and traffic and parking attendants would be used to direct vehicles into appropriate parking areas.

**Comment 100:** The logistical issues of managing the on-site tram system almost boggles the mind. Assuming that the parking areas fill up over the course of maybe 60-90 minutes prior to an event, the tram system might be able to regulate the steady flow of load-and-goes to the arena. But what happens when 19,000-people empty simultaneously following an event? Suppose there is a contentious outcome in the contest against one of the team's top rivals? Who will police that queue? Is the two-lane road located between the west end of the racetrack and the LIRR spur safe and sufficient to handle all of those trams? Suppose there is an emergency? How will they free up that bottleneck? (Alleci\_028)

**Response:** As discussed in the responses to Comment 151 and Comment 179 (below), the system of internal shuttle buses serving the North Lot, East Lot, and LIRR Elmont Station are designed to accommodate the maximum number of patrons and employees that would use the shuttle buses during arena events and after an event and that up to four trains of 10 cars each could be operated east or west out of the Belmont Park Station adjacent to the arena, which would allow passengers to board a train immediately after an event without the use of a shuttle bus. The Operations Plan of the draft TMP (Appendix J of the FEIS) includes detailed information about pedestrian flow and safety, the staff that would be used to direct the flow of pedestrians and vehicles, and the internal shuttle bus routes and rideshare services that would use the road located between the west end of the Racetrack and the Belmont Park spur line. This road consists of two 24-foot-wide roadways (which can accommodate a total of four travel lanes, not two lanes as cited by the commenter) as well as an adjacent sidewalk. As discussed in the Operations Plan, the Proposed Project would also include an on-site transportation operations center to manage traffic flow and coordinate responses to specific incidents.

**Comment 101:** Woodbury Common recognizes that individual auto visits make up the vast majority of visitors, and it has many times the number of available parking spaces, as well as has made a significant investment in multi-tiered computer assisted parking garages close to the retail village as compared to the current Belmont Park retail village experience. (McEnergy\_180)

**Response:** The Proposed Project would include a total of 1,500 parking spaces directly below the retail village. As demonstrated in Chapter 11, Tables 11-39 through 11-43 of the FEIS, this could accommodate most of the parking demand for the retail on Site B on a weekday and a Saturday (representative of a weekend day). During peak shopping periods, retail village patrons would also park in the South and



East Lots, which would be served by shuttle buses operating to and from the retail village.

**Comment 102:** To have just 40 parking spaces directly associated with a 19,000 seat arena is just laughable. There are more parking spaces on Plainfield Avenue at a church gym's parking lots for a CYO game at Our Lady of Victory Church than there are at the 19,000 seat arena. Given the hotel's immediate proximity to the arena, which has only 40 parking spaces of its own, allowing only 400 parking spaces at the Belmont Park hotel is unacceptable. (McEnery\_180)

**Response:** As discussed in Chapter 11, "Transportation," of the FEIS, the 40 parking spaces in the arena's loading dock area would be made available for player and coach parking when it is not being used for trucks. Overall, the Proposed Project would include a total of 1,900 parking spaces on Sites A and B and a total of 6,014 parking spaces on the North, South, and East Lots for arena events and/or peak shopping periods, and would provide shuttle service for visitors parking in these locations. As shown in Chapter 11, 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 103:** Regarding the response to Comment 11-197, it is interesting that the ESD and NYAP takes issue with the figures derived from information obtained from NYRA, which has only been the primary tenant of the renovated Belmont Park for over 50 years. Even taking the elimination of 1,965 parking spaces at face value, when adding a 19,000 seat arena, a 250 key hotel with 'convention' space, the new office building, but most of all the 28 acre retail shopping experience on south side of Hempstead Turnpike makes the elimination of almost 2,000 parking spaces all the more unacceptable. (McEnery\_180)

**Response:** The number of existing and projected parking spaces on the Project Sites was developed based on multiple sources of information, including drawings of parking plans prepared by NYAP, and was not solely based on information provided by NYRA. As discussed in Chapter 11, "Transportation," of the FEIS, the Proposed Project would include a total of 1,900 parking spaces on Sites A and B and a total of 6,014 parking spaces on the North, South, and East Lots for arena events and/or peak shopping periods and would provide shuttle service for visitors parking in these locations, which would be sufficient to accommodate the parking demand for the Proposed Project.

**Comment 104:** In Chapter 11 of the FEIS, parking facilities regarding the North lot: there is no mention of the parking for the new Elmont LIRR Station and its impact on this part of the site. (Gunther\_205)

**Response:** The new Elmont LIRR Station is mitigation for traffic impacts, and as such is presented in Chapter 17, "Mitigation," of the FEIS. Chapter 17 discusses the

parking facilities associated with the new LIRR Elmont Station and provides an assessment of its effect on parking conditions.

**Comment 105:** In Chapter 11 of the FEIS: "... There will be no changes to the amount of parking on the... East lot. Overall the Proposed Project would result in a net reduction of approximately 1,965 parking spaces on the Project sites..." Table 11-38 quantifies reductions by location that unfairly affect the Village of Floral Park: with a net reduction of 1,080 at Site B and 745 at Site A; however only 140 spaces at the North Lot are re-designated for the LIRR Elmont Station. This does not add up to a responsible plan. (Gunther\_205)

**Response:** The FEIS shows that there would be sufficient on-site parking to accommodate the full parking demand for the Proposed Project event with sold-out events at the arena and racing at Belmont Park. This is a responsible plan that would not result in parking spilling over to the adjacent communities, including Floral Park. It is also noted that a total of 150 commuter parking spaces would be provided in the North Lot, not the 140 spaces as cited by the commenter.

#### *VEHICULAR AND PEDESTRIAN SAFETY*

**Comment 106:** It is only when all of these commercial vehicles destined for the Retail Village turn on to Hempstead Avenue that the journey gets potentially dangerous. The FEIS almost flippantly referenced this potentially dangerous issue. On Page 11-62 the FEIS states: *Trucks and buses would travel to and from the Project Sites via Hempstead Avenue or Hempstead Turnpike due to access restrictions on the Cross Island Parkway. Trucks and buses to the retail village would travel eastbound along Hempstead Turnpike and would enter the Project Sites via Gate 14... and all trucks and buses from the retail village would exit the Project Sites via Gate 14 to travel eastbound on Hempstead Turnpike and would not exit the Project Sites via the Cross Island Parkway. Trucks and buses traveling westbound along Hempstead Turnpike traveling to the retail village would turn around at a location in Queens to approach the site in the eastbound direction. Similarly, trucks and buses exiting the retail village destined to travel westbound on Hempstead Avenue would exit the Project Sites in the eastbound direction and then turn around at a location such as the intersection of Hempstead Turnpike with Locustwood Boulevard/Gate 5 Road.*

Commercial vehicles (and Shopping Express® luxury coaches) can only access the Retail Village as they head eastbound on Hempstead Avenue. Likewise, all commercial traffic leaving the Retail Village must exit heading eastbound. In plainer English, the EIS report suggests that all commercial vehicles heading to the property from the east – make a U-turn “at a location in Queens,” and that all commercial vehicles leaving the Retail Village make a U-turn on Hempstead

Avenue in order to turn back west. Does someone in authority want to go on record as saying this is a sound and safe plan? (Emmel\_100)

All trucks and buses exiting from the retail village would use Gate 14 to travel eastbound along Hempstead Turnpike, not on the Cross Island Parkway. a) How would these vehicles travel north without using Plainfield Avenue? b) If wishing to go west, all trucks would be required to make a U turn on Hempstead Turnpike; this is unreasonable and unsafe. (Gunther\_205)

Trucks and buses traveling to the site from the east would need to make a U turn in Queens to reach the entrance to the retail site. Likewise this is unreasonable and unsafe. Trucks higher than 9'-3" could not use the Hempstead Tpke underpass, necessitating traveling on local roads. (Gunther\_205)

**Response:** As discussed in Chapter 11, "Transportation," of the FEIS, service vehicles that are less than 9'3" in height would be able use the Belmont Park Road tunnel to cross below Hempstead Turnpike and enter and exit the Project Sites via the intersection of Hempstead Turnpike and Gate 5 Road. This would allow these vehicles to enter or exit the retail village from Hempstead Turnpike in either the eastbound or westbound directions without the need to turn around at another location. As described in the Operations Plan of the draft TMP (Appendix J), most deliveries to the retail village would be made by UPS and FedEx style vans, not larger trucks. While buses and other vehicles greater than 9'3" in height would approach and depart Site B via Hempstead Turnpike in the eastbound direction, these would not constitute a sizeable number of trips throughout the course of the day. Trucks and buses needing to turn around at a location in Queens could do so making a series of turns, such as by traveling from Hempstead Avenue to Jamaica Avenue to Springfield Boulevard to Hempstead Avenue, which would not require vehicles to make a U-turn movement at one location as mentioned by the commenters.

#### *SITE ACCESS AND EGRESS*

**Comment 107:** ESD has stated "pick-up and drop-off zones will be configured to maximize loading capacity and minimize queues without burdening local neighborhoods with additional traffic," but has not offered specific information regarding the plan. This leaves some unanswered questions:

1. Will NYAP/ESD conduct ongoing traffic studies to help relieve the dramatic increase of traffic through residential streets?
2. Will NYAP/ESD provide funds to the local community to use for its own independent traffic study?
3. As part of its proposal, has NYAP/ESD conducted a preliminary assessment of, or at least presented a strategy to address the increased traffic along the Cross Island Parkway due to the project, and the impact to local roads in

Floral Park if the Cross Island cannot support existing and increased traffic (McAllister\_159)

The FEIS identifies local jurisdictions to take part in the traffic management process identified in the TMP but makes no reference on how the Villages will fund such involvement. Many of the villages do not have on staff traffic experts and would need to retain outside consultants to fund such ongoing involvement. (VFP\_215)

**Response:** Chapter 11, “Transportation,” of the FEIS discusses the drop-off and pick-up locations for taxis and rideshare vehicles, and additional details regarding these locations are provided in the Operations Plan of the draft TMP (Appendix J of the FEIS). The FEIS includes a comprehensive traffic study of the local street and highway networks during weekday and weekend time periods with and without sold-out events at the arena. Chapter 17, “Mitigation,” of the FEIS identifies 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. As part of the TMP, a monitoring plan would be implemented to measure the effectiveness of the various components of the TMP and to identify additional feasible and practicable mitigation, if necessary. NYAP would fund all required traffic studies and monitoring per the TMP and MEC.

**Comment 108:** Who is going to purchase, operate and maintain electric shuttle buses? Will they be in compliance with ADA? (McEnery\_180)

**Response:** The ADA-compliant electric shuttle buses would be purchased, operated, and maintained by NYAP.

**Comment 109:** What is the capacity of each of these electric buses which can vary based on size from 20 to 50 riders? (McEnery\_180)

**Response:** The Operations Plan of the draft TMP (Appendix J of the FEIS) discusses the types of internal shuttle buses that would be utilized. These would include smaller buses with a capacity of 15 to 20 riders and larger buses with a capacity of up to 80 riders.

**Comment 110:** In Chapter 11 of the FEIS: Passengers traveling from the LIRR Elmont Station would “cross the Red Road to reach the plaza on the north side of the arena ... The Red Road would be closed to general traffic during, before and after arena events ...” During these periods it is unclear what path passenger cars will take: will they be re-directed toward the east? How is this workable? Please provide supportive site plans. (Gunther\_205)

**Response:** Routes used by Project-generated vehicles are provided in Chapter 11, Figures 11-7 through 11-11 of the EIS, which show that Project-generated autos would

not use the segment of Red Road cited by the commenter. As described in Chapter 17, “Mitigation,” of the FEIS, Red Road could be used by commuters traveling to the commuter parking in the North Lot and during times of arena events residents using the commuter parking during this time period would exit the North Lot using Exit 26D on the Cross Island Parkway, travel south along the parkway, and use Exit 26B to travel east along Hempstead Avenue/Turnpike. Figure 28 of the Operations Plan in the draft TMP (Appendix J) shows the routes that would be used by commuters parking in the North Lot.

#### *EMERGENCY VEHICLE RESPONSE TIMES*

**Comment 111:** In the middle of May, I attended a security meeting between various agencies in Lower Manhattan. While security concerns were addressed regarding the new arena, it was stated that a security study was not completed because other components of the plans, such as the hotel and shopping village, were not complete and not in final stages. How can we move forward in this day and age without proper plans and security studies done? Further, we left the meeting with a final note that resources need to be addressed and mutual aid plans need to be developed. I’ve explained our traffic problems and lack of infrastructure to expand and absorb it. It is already causing delays and problems responding. (Longobardi\_TS5\_049)

**Response:** Development of the on-site security plan is an ongoing process that would continue to be refined with law enforcement agencies prior to the opening of the Project. As the most critical element of the security plan involves the arena and its associated event day operations, finalization of security plans for the hotel and retail village components would not be expected to have a significant effect on the overall security plan. As discussed in Chapter 17, “Mitigation,” of the FEIS, 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 112:** The concern raised in comments on the DEIS regarding emergency response times is only exacerbated by the proposed TMP recommendation to mark Plainfield Avenue as ‘unavailable’ during events. Emergency services will be restricted from utilizing app based direction applications if the roadways are identified as closed. (VFP\_215)

Your now “Final” plan proposal, if implemented “as-is” will only intensify accidents, tempers and cause vital emergency delays for our local police, fire, and medical first responders. (Lockwood\_210)

**Response:** When a mobile navigation app does not include a roadway as a travel option, it does not mean that a road is physically closed. Therefore, the road would continue to be accessible to emergency vehicles. This condition would only occur during arena event arrival and departure periods, and would be coordinated with stakeholders that have jurisdiction over the roadway. The TMP included in the FEIS is currently labeled “draft” as it will be further refined based on input from stakeholders and additional data that may be collected between now and arena opening. The TMP is intended to be adaptable to changing conditions and the latest information and technology.

*GENERAL*

**Comment 113:** In Chapter 11 of the FEIS, virtually no substantive or quantitative changes to transportation analyses have been identified thru the entire chapter. Why have the DEIS comments not been reflected and incorporated? There appear to be absolutely minimal changes to the detailed data Tables in the chapter. (Gunther\_205)

**Response:** Chapter 11 contains an assessment of potential transportation impacts of the Proposed Project, and remains substantially unchanged from the DEIS. Chapter 17, “Mitigation,” contains mitigation measures and revised tables reflecting the impacts of the Proposed Project with mitigation measures in place. Chapter 22, “Response to Public Comments,” of the FEIS provides responses to all substantive comments received on the DEIS and notes where changes have been made in the FEIS, where appropriate.

**Comment 114:** In Chapter 11 of the FEIS, conflicting and inconsistent information appears in the FEIS, both text and maps, regarding the location of “Belmont Park Road.” Is it hugging the fence separating Belmont Park from Floral Park or is it south of Hempstead Turnpike or both? This confusion is compounded by referenced identification of Red Road that differ from the DEIS. (Gunther\_205)

**Response:** “Belmont Park Road” runs in a north-south direction along the east side of the retail village and below Hempstead Turnpike, and also runs along the fence separating Belmont Park from Floral Park along the North Lot.

**Comment 115:** NYCDOT has yet to complete its independent study of the Project’s impacts and possible mitigation measures, which it agreed to incorporate into its Queens/Nassau Traffic Interphase Study. What is the rationale for rushing ahead of the independent study of this project’s impacts on the surrounding communities? Shouldn’t we wait for those results? (Alfonsi\_TS5\_086, Bambrick\_TS5\_050, Marshall\_TS5\_087, Ronan\_126, Gunther\_205, Smith\_213)

**Response:** NYCDOT analyzed the traffic study contained in the EIS and issued a comment letter which was included in Chapter 22 of the FEIS. NYCDOT also reviewed the

TMP and all supporting materials. ESD, the Applicant and their respective consultants met with NYCDOT several times during NYCDOT's review of the DEIS and ESD's preparation of the FEIS. NYCDOT issued a follow-up letter, which stated that its concerns had been addressed and answered and confirming its acceptance of the analyses (see the correspondence in Appendix M of the FEIS). NYCDOT has been included as a stakeholder of the TMP. A draft copy of the TMP is included in Appendix J of the FEIS. NYCDOT is conducting an independent traffic study, the "Nassau-Queens Interface Transportation Study," for which ESD provided Project-related traffic data for NYCDOT's use. To the extent that the results of that study affect the traffic network proximate to the Proposed Project, those results and any recommendations made would be taken into account in the on-going implementation of the monitoring plan as part of the TMP.

## NOISE

**Comment 116:** Without a solid traffic mitigation and transportation plan, the FEIS does not address potential impact of excessive noise pollution that will impact the surrounding communities. (Kelleher\_TS5\_093)

**Response:** 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 analysis is conservative in not accounting for reduced traffic noise associated with traffic mitigation. 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 117:** I live near the proposed North Lot and fear excess noise when traffic at this project and visitors can't leave safely in a timely manner. Eight-foot hedges and a screened in fence is not and will not mitigate noise and traffic and light pollution. (Kelleher\_TS5\_093)

The hedgerow and fencing with privacy screening described in the FEIS will do nothing to abate the noise, air and light pollution. (Mesnick\_115)

**Response:** 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. Privacy screening within the fencing would be expected to minimize light intrusion from vehicle headlights in the North Lot.

**Comment 118:** Despite the efforts described in the FEIS to discourage honking, it is ludicrous to expect any enforcement of this. (Mesnick\_115)

**Response:** As described in Chapter 22, “Response to Public Comments,” of the FEIS, 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. As described in Chapter 13, “Noise,” of the FEIS, celebratory honking and tailgating at all Proposed Project parking facilities would be prohibited and strictly regulated through signage, patrolling, and fines. These prohibitions will be memorialized in the Project’s MEC and will be a condition of the lease.

## **CLIMATE CHANGE**

**Comment 119:** The New York State Senate and Assembly just passed the Climate and Community Leadership Protection Act that mandates 50 percent renewable energy by 2030 and 100 percent elimination of human-caused climate pollution by 2050. This will become law immediate as soon as signed by Governor Cuomo. This urgent mandate it not addressed at all in the proposals for the Belmont Development project, or in the Environmental Impact Study. (Lyons\_023, Lyons\_146, Lyons\_147)

**Response:** The recently-signed Climate and Community Leadership Protection Act (CCLPA) continues the actions New York State has taken to reduce statewide greenhouse gas (GHG) emissions in order to minimize the rate of climate change. The CCLPA established the goal to reduce GHG emissions from all anthropogenic sources 100 percent over 1990 levels by the year 2050—superseding the previous goal of 80 percent reduction over 1990 levels established in Executive Order No. 24, as discussed in the FEIS. The CCPLA also affirms the incremental goals established in the 2030 state energy plan to reduce GHG emission levels by 40 percent over 1990 levels and to provide 50 percent of electricity generation in the state from renewable sources by 2030 as discussed in the FEIS. The law provides for the ability to relax these deadlines if the imposition of such requirements would have a significant impact on the provision of safe and adequate electric service.

The Proposed Project is not inconsistent with the CCLPA, which provides a long-term goal for transforming the entire State’s energy generation, transportation and



building sectors. Achieving such goals will require a significant investment and development of renewable energy sources (and transmission and energy storage infrastructure to support it) before the transportation and real estate industry can obtain sufficient electricity from renewable sources to achieve the CCPLA targets. Furthermore, as discussed in Chapter 14 of the FEIS, “Climate Change,” the Proposed Project’s commitment to building energy efficiency would ensure consistency with the decreased energy use goals defined in the New York State’s energy code and the Climate Smart Communities Pledge as part of the Town’s GHG reduction goal. The Proposed Project would also support other state and local GHG goals by virtue of its proximity to public transportation, reliance on natural gas, LPG, or electricity rather than higher carbon-emitting 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. All of these factors demonstrate that the proposed development supports GHG reduction goals.

**Comment 120:** Recent articles note that carbon pollution is accelerating global climate change so fast and broadly around the world that as soon as 20 years from now its effects will be irreversible and deadly to most forms of life on our planet by 2100. Scientists are now saying the most urgent action we must implement immediately is a re-greening of our planet. Some 150-200 hundred acres of Belmont Park are open and undeveloped. They have no structures and are mostly parking areas, fields and wooded areas. With the possible exception of farming, they have probably been open areas going back thousands of years. Covering Belmont Park with cement and rarified structures for the benefit of profit hungry businesses to entice people in millions of cars, busses, trucks and trains to go there at this time in our history is a very bad idea and on its face an environmental crime. (MacDonald\_200)

**Response:** As described in Chapter 1, “Project Description,” of the FEIS, the Proposed Project is intended to transform the current vacant, underutilized, and substandard areas on the Project Sites to the benefit of the community. It also aims to create a premier destination which would complement Belmont Park, enhancing economic benefit in comparison with the current underutilized and substandard character of the Project Sites. The development objective of the Project Sites would not be met if the Project Sites were redeveloped entirely as open spaces. The Proposed Project would, however, include 3.75 acres of landscaped open space on Site B and 2.0 acres of hard-/soft-scaped plazas on Site A. These areas would include the planting of trees, shrubs, and herbaceous species. In addition, the Applicant is committed at a minimum to achieve the prerequisite energy efficiency requirements under Leadership in Energy and Environmental Design (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. Furthermore, additional energy savings would likely be achieved via guidance for tenant build-out, which would control much of the building's energy use and efficiency. 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 as part of the Town's GHG reduction goal.

## **CONSTRUCTION**

### *GENERAL*

**Comment 121:** How will rodent problems be addressed? (McClintock\_TS5\_080)

When you break ground, what measures are in place to control the rodents? I don't want to find any in my backyard! (Amato\_119)

**Response:** As described in Chapter 15, "Construction," of the EIS, pursuant to a requirement imposed by ESD, NYAP would require in its construction contracts that contractors implement measures during construction to minimize potential impacts to nearby communities from ongoing construction. This would include rodent control measures such as construction contract provisions for a rodent control program where appropriate.

### *TRANSPORTATION*

**Comment 122:** Moving large construction equipment and trucks with building materials that are coming from areas north of Hempstead Turnpike through our single-lane local roads, i.e., Tulip Avenue, Carnation Avenue, Plainfield Avenue, and Covert Avenue will result in congestion on our roads, the possibility of accidents and damage to the road surfaces. (Gribbins\_040)

**Response:** 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 123:** On page 17-6 of the FEIS: “Construction transportation impacts” incorrectly state the time of maximum PM adverse impacts at 5:15 to 6:15 PM. Most construction staff depart work at 3:00 PM, coincidental with peak school bus traffic. Why is this not addressed? Where is the quantification of the voluminous construction-related traffic, especially trucks, in support of this 10,000 construction jobs project? (Gunther\_205)

**Response:** As discussed in Chapter 15, “Construction,” of the FEIS, construction site activities would normally take place on weekdays during the typical construction shift of 7:00 AM to 5:00 PM. Table 15-4 provides estimates of auto trips by workers and construction truck trips over the course of the day during the peak construction period and shows that 80 percent of construction workers would depart the site during the 5:00 PM to 6:00 PM peak hour. Regarding the 10,000 construction jobs, please see the response to Comment 15-15 in Chapter 22, “Response to Public Comments,” of the FEIS.

## ALTERNATIVES

**Comment 124:** I heard there was a new alternative in the FEIS that considers building no retail, just leaving the parking. ESD says it would have no (or negligible) impact on transportation in the community. That strains credulity; that can’t be possible. (Gunther\_TS5\_095)

**Response:** Chapter 16, “Alternatives,” of the FEIS details the results of the transportation analyses for the No Retail Village Alternative (a smaller-scaled project without retail on Site B), and provides a comparison to the Proposed Project.

**Comment 125:** The DEIS failed to consider a “no retail village”/mall alternative that would have reduced the size of the project, reduced associated traffic and community character impacts, and reduced the project’s reliance on NYRA’s parking facilities; therefore the public did not have the opportunity to review or comment on it. The FEIS’ discussion of the new alternative is misleading, as it appears that the mitigation measures considered in assessing the impacts for the Project with a mall component (including the TMP) were not included in the assessment of the impacts of the No Retail Village alternative. As a consequence, the comparison of the traffic impacts of the full “Build with Mitigation” Project to the significantly scaled down “No Retail” alternative falsely indicates that the “No Retail” alternative will actually have more negative traffic impacts than the “Build with Mitigation” Project. ESD’s assertion that the “No Retail Village” alternative will have greater impacts than the “Build with Mitigation” Project is the result of either: (i) a deliberate attempt to mislead the public to justify this unnecessary mall, or (ii) seriously flawed assumptions and analyses that were applied in the development of the FEIS. (VFP\_169, VFP\_214, VFP\_215)

**Response:** In Chapter 16, “Alternatives,” of the FEIS, Tables 16-10 and 16-11 present a direct comparison of the number of individual traffic movements, intersections, and highway segments that would have significant adverse traffic impacts for the No Retail Village Alternative and Proposed Actions. The FEIS indicates that the new LIRR Elmont Station and the demand management strategies of the TMP could be used as a mitigation measure for the No Retail Alternative as they would reduce vehicle trips generated by arena patrons. While a complete analysis of the No Retail Village Alternative with the new LIRR Elmont Station and the demand management strategies of the TMP in place was not conducted, the FEIS included an analysis of the study area intersections with unmitigated impacts under the No Retail Village Alternative to determine if the addition of the new LIRR Elmont Station and implementation of the demand management strategies could further mitigate any of the unmitigated intersections. This analysis was sufficient to determine which of the unmitigated traffic impacts that were identified in Table 16-10 could be eliminated under this alternative. Please also see the response to Comment 8.

**Comment 126:** In many locations, the ‘no retail’ alternative identifies worse impacts than the proposed project, which is counterintuitive since reducing the intensity of the project should not increase the impacts. (VFP\_215)

**Response:** In Chapter 16, “Alternatives,” of the FEIS, Tables 16-10 and 16-11 present a comparison of the number of individual traffic movements, intersections, and highway segments that would have significant adverse traffic impacts for the No Retail Village Alternative and Proposed Actions. While these tables show that the No Retail Village Alternative would generally result in a slight reduction of significant adverse impacts when compared to the Proposed Actions, there were limited instances where the results of the traffic analyses showed that the No Retail Village Alternative would result in new or additional impacts compared to the Proposed Actions. For example, during the weekday PM peak hour the intersection of Plainfield Avenue at Cherry Street would be impacted under the No Retail Village Alternative but would not be impacted under the Proposed Actions; this is a result of the increased number of parking spaces on Site B and fewer trips assigned to park in the North Lot in the No Retail Village Alternative. As another example, during the weekday PM peak hour the analyses show that there would be additional highway segments impacted along the southbound Cross Island Parkway under the No Retail Village Alternative compared to the Proposed Actions; this is a result of the presence of congested locations in the Proposed Actions having a “metering” effect on adjacent downstream segments of the highway network.

**Comment 127:** The traffic studies included in the FEIS makes little or no changes between alternatives, even as between the ‘No Arena’ alternative and the ‘No Retail

Village' alternatives which makes no sense. It is as if neither of them will add to the congestion already present, which simply defies logic. (McEnery\_180)

**Response:** Chapter 16, "Alternatives," of the FEIS includes summaries of vehicle trip generation and traffic impacts for both the No Arena Alternative and No Retail Village Alternative and compares these to the Proposed Actions. Table 16-2 of the FEIS shows that the No Arena Alternative would generate substantially fewer trips than the Proposed Actions during the weekday PM, Saturday Midday, Saturday PM, and Saturday night peak hours. As an example, Table 16-4 of the FEIS accordingly shows that substantially fewer highway segments would be impacted under the No Arena Alternative compared to the Proposed Actions during the Saturday Midday, Saturday PM, and Saturday night peak hours, and explains why the results of the traffic analyses show that there would be fewer impacted highway segments in the southbound direction under the Proposed Actions during the weekday PM peak hour (which is a result of congested locations in the Proposed Actions having a "metering" effect on adjacent downstream segments of the highway network).

Table 16-9 of the FEIS shows that the No Retail Village Alternative would generate fewer trips than the Proposed Actions during all of the analyzed peak hours, but the project-generated volumes associated with the retail village represent a relatively small share of the total project-generated volumes except for the weekday AM peak hour. As an example, Table 16-11 of the FEIS accordingly shows that fewer highway segments would be impacted under the No Retail Village Alternative compared to the Proposed Actions during the Saturday Midday, Saturday PM, and Saturday night peak hours, but the reduction in impacts under the No Retail Village Alternative would be far less than the reduction of impacts under the No Arena Alternative.

**Comment 128:** By assessing each of the three Project components separately (arena, retail, hotel), ESD and the public will be able to better assess the individual portions of the Project, and well avoid the broad brush statement that one is against the Islanders and the arena, which is apparently one of the acts being taken by supporters of the Project, while the vast majority of comments demonstrate a lack of support for the retail operations of the Project. (McEnery\_180)

I applaud ESD's attempt to scale back the scope of the Project, but it is not enough. I strongly urge ESD to eliminate the 435,000 total square feet of retail in its proposal, and to consider an alternative in a Supplemental DEIS that includes an arena only. (Culotta\_222)

**Response:** Assessing each of the components of the Project separately would minimize the identification of the total impacts of the Project as a whole since the identification of significant adverse traffic impacts is based on increases in vehicular delay, to which each of the individual project components contribute. However, Chapter 16, "Alternatives," provides an analysis of the Project without an arena (the No

Arena Alternative) and without the retail village (the No Retail Village Alternative). Looking at the contributions of each project component to total vehicle trip generation (shown in Table 11-5), it is clear that the hotel is only a modest contributor to the volume of vehicle trips generated, while retail uses are a substantial contributor as compared to arena trips only in the weekday AM peak hour. During each of the other peak hours analyzed, although the retail component is a significant vehicle trip generator, its magnitude pales by comparison to the volume of vehicle trips generated by the arena for sellout events.

**Comment 129:** Suppose the Belmont Arena gets built, but the property south of Hempstead Turnpike, currently assigned for the Retail Village, is developed as 2,500 parking spots for arena goers? That's 2,500 fewer cars that will have to navigate the maze of the North, East or South Belmont lots. That's about 5,000 fewer fans clamoring for those post-game "trams to the train." That parking area is an easy on and off for cars to the Cross Island. The Parkway will still be congested, but 2,500 parking spots within actual walking distance of the arena would provide at least some relief. If there was no mall, Islanders fans would have a far better experience with 2,500 walkable parking spots south of Hempstead Turnpike. Commercial traffic would be sliced considerably without those trucks and buses servicing 10,000 shoppers per day. Water, sewage and power needs would be more manageable for all local utilities. There are a myriad of reasons why no mall makes the most sense. (Emmel\_100)

**Response:** Chapter 16, "Alternatives," of the FEIS includes an assessment of a No Retail Alternative representing a smaller-scaled project that would develop the elements of the Proposed Project but without a retail village and compares it to the Proposed Project. This alternative concluded that like the Proposed Project, the No Retail Village Alternative would not result in significant adverse impacts with respect to: land use, zoning, and community character; community facilities and utilities; open space and recreational resources; historic and cultural resources; visual resources; socioeconomic conditions; hazardous materials; water resources; natural resources; LIRR service; pedestrian circulation; air quality; and noise. Additionally, compared with the Proposed Project, the No Retail Village Alternative would lessen, but not eliminate traffic impacts. Both the No Retail Village Alternative and Proposed Project would result in the same unmitigated traffic impacts to the local street network. The construction noise impacts of the Proposed Project would be eliminated under the No Retail Village Alternative. Please see the response to Comment 184 regarding the use of internal shuttle bus routes between Site A and the North Lot and the new LIRR Elmont Station during the post-event period.

**Comment 130:** If ESD insists on moving forward, the newly-presented No Retail Village Alternative is preferred over the Proposed Project. (McEnery\_180)

**Response:** Comment noted.

## MITIGATION

### *TRAFFIC (GENERAL)*

**Comment 131:** The DEIS identifies locations in which mitigation is proposed throughout the study area. Almost all of this mitigation is minor timing changes to existing traffic signals. This mitigation is not credible as it is based on the assumption that only 3 percent to 5 percent of the vehicles will access the site from the local street network. The mitigation plan will need to be revised once an appropriate amount of traffic is assigned to the local street network, including identifying where physical improvements are required.

Since the FEIS relies on the addition of the Elmont Train Station and the TMP for mitigation, this comment remains outstanding. The proposed minor mitigation is not credible given that the FEIS projects only a very small number of vehicles will utilize the local street network. (VFP\_215)

**Response:** As discussed in the response to Comment 17-17 in Chapter 22 of the FEIS, “Response to Public Comments,” the commenter’s assertions that only 3 percent to 5 percent of the vehicles will access the site from the local street network is incorrect. Please see the response to Comment 83.

**Comment 132:** Chapter 11 of the FEIS states, “Chapter 17 Mitigation Measures identifies and evaluates measures to improve overall highway network conditions... that would most benefit key segments of the Cross Island Parkway...” What about local streets? (Gunther\_205)

**Response:** The statement cited by the commenter is located in the “Highway Network” section of Chapter 11, “Transportation.” The “Local Street Network” section of Chapter 11 discusses local streets.

**Comment 133:** The FEIS identifies “unmitigated impacts” on certain streets/intersections. Why is this acceptable? (Gunther\_205)

Even if one accepts that all the mitigation measures identified in the FEIS are correct, the project still has unmitigated traffic impacts on up to 22 highway segments of the Cross Island Parkway as well as impacts to local roadways. If improvements cannot be made to mitigate project impacts, the size and scope of the project should be reduced to minimize and/or eliminate the unmitigated impacts. (VFP\_215)

**Response:** The FEIS identifies mitigation to the extent feasible and practicable. Widening the Cross Island Parkway is not reasonably feasible as it would require reconstructing numerous overpasses and underpasses. Furthermore, ESD’s goal

was to develop mitigation that would promote mass transit and reduce reliance on autos as a means of traveling to the Proposed Project. The FEIS does not state and SEQRA does not require that all significant adverse impacts be mitigated. Where impacts could not be mitigated by reasonable and practicable measures, they were disclosed as unmitigated impacts. It is not uncommon for major development projects to have unmitigated impacts and it is left to the discretion of the lead agency to determine in its findings whether social, economic and other essential considerations outweigh such impacts. Please also see the response to Comment 222.

**Comment 134:** None of these transportation mitigation measures address the traffic related to the time of the 10,000 job construction phase. (Gunther\_205)

**Response:** Mitigation measures for construction-period traffic impacts are outlined in Chapter 17, “Mitigation,” of the FEIS.

**Comment 135:** Regarding the potential for traffic diversions to local streets, why is the FEIS rushed to publication ahead of the separate studies underway by both the City of New York and the Town of Hempstead? Without benefit of information provided by these entities, the FEIS seems to be farcical! Please be receptive also to information from the Village of Floral Park’s traffic consultant. This is especially alarming given the description of TMP strategies described. (Gunther\_205)

**Response:** The Draft TMP (Appendix J of the FEIS) was shared with and reviewed by NYCDOT, the New York State Department of Transportation (NYSDOT), and NCDPW, which along with the Town of Hempstead and the Village of Floral Park would be stakeholders in the TMP. Comments received from the Village of Floral Park’s traffic consultant are addressed separately within this document. Please also see response to Comment 115.

**Comment 136:** On page 17-36 of the FEIS, “Construction Transportation (Traffic)” misstates heavy traffic times for construction personnel who typically depart at 3:00 PM. Will the TMP be in place to monitor this 10,000 jobs traffic? (Gunther\_205)

**Response:** As discussed in Chapter 17, “Mitigation,” of the FEIS, during the projected peak quarter of construction all of the anticipated significant adverse traffic impacts would be mitigated except for the intersection of Hempstead Avenue and Springfield Boulevard. The TMP is not proposed for the construction period. Regarding the 10,000 temporary construction jobs, please see Response 15-15 in Chapter 22, “Response to Public Comments,” of the FEIS, which discusses how these are estimates of full-time equivalent (FTE) jobs and would not all occur at the same time. Please also see the response to Comment 123.



**Comment 137:** On page 17-39 of the FEIS, how does the new LIRR Elmont Station remove vehicle trips from the local roadway network during construction? (Gunther\_205)

**Response:** The new LIRR Elmont Station would not remove vehicle trips from the local roadway network during construction. The text cited by the commenter refers to the completed LIRR Elmont Station (after construction). Construction of the LIRR Elmont Station is discussed in Chapter 17, pages 17-44 and 17-45 of the FEIS.

**Comment 138:** According to your EIS, “all identified significant adverse environmental impacts within local neighborhoods could be fully mitigated with the exception of two traffic intersections.” Is there a reason these are not identified? Furthermore you indicate significant adverse traffic impacts at six intersections during weekday hours, and nine on Saturdays. How can you justify saying environmental impacts will be fully mitigated? (Talty\_153)

**Response:** Chapter 17 of the FEIS, “Mitigation,” identifies the intersections on the local street network that would have significant adverse impacts in each of the analyzed peak hours and indicates whether or not the impacts could be fully mitigated. These are summarized in Table 17-4, which shows that the impacts at the intersections of Hempstead Avenue at Springfield Boulevard and at 225th Street could not be fully mitigated.

#### *TRANSPORTATION MANAGEMENT PLAN (TMP)*

**Comment 139:** The FEIS states the following in Chapter 17, Page 17-2: “A key element of the TMP aimed at reducing the potential for traffic diversions onto sensitive local residential streets is for NYAP to partner with navigation app providers such as Waze to define local streets that could be designated as ‘unavailable’ to through traffic during event arrival and departure periods so that through traffic would not be routed to them.” Waze only accounts for 12 percent of navigation app usage with 67 percent using Google Maps and 11 percent using Apple Maps. Do Google Maps and Apple Maps allow for local streets to be made “unavailable” for sports events? What percentage of arena patrons are expected to be using Waze for it to be considered a “key” element of the TMP? (Baggott\_039)

**Response:** Chapter 17, “Mitigation,” of the FEIS discusses Waze as an example of a navigation app that NYAP would partner with. NYAP would also seek to partner with other navigation app providers as well.

**Comment 140:** The FEIS suggests that the transportation management team, in coordination with stakeholders, would partner with navigation app providers such as Waze to define specific local residential streets which might otherwise be used as traffic diversion routes, such as Plainfield Avenue in Floral Park to be designated by the navigation app provider as an “unavailable” road during event arrival and departure periods.

ESD is apparently proposing to coordinate with Waze and other traffic navigation apps to misinform the public that certain roads are closed when in fact there is no intention to close the roads. Is ESD seriously suggesting that providing misleading information to the public is an acceptable mitigation measure? This proposal is questionable on many levels and as a traffic mitigation proposal it is doomed to fail because ESD's assumption that Waze and other navigation apps will designate these local routes as unavailable is directly contradicted in public statements made by navigation application providers that the applications only follow what a road system legally permits. (VFP\_169)

The TMP identifies working with 'Waze' or other direction based applications to mark certain roadways, such as Plainfield Avenue, unavailable during events to discourage patrons from using them. A number of problems are apparent with this strategy: 1) There is no precedent that Waze or any other direction based application will agree to voluntarily identify public roads as closed even though they are still open to traffic. 2) Identifying these roads as closed will impact local residents as they will no longer be able to rely on navigation apps to travel to their homes and businesses. 3) Inaccurate information discourages use of direction based applications, which will cause drivers to move to other applications over time. 4) Drivers utilizing different applications from 'Waze' will still be directed to local roadways, cancelling out any benefit made by this strategy. (VFP\_215)

**Response:** When a mobile navigation app does not include a roadway as a travel option, it does not mean that a road is physically closed. This condition would require coordination with stakeholders that have jurisdiction of the roadway, and would only occur during arena event arrival and departure periods. Plainfield Avenue and Tulip Avenue are not under the jurisdiction of NYSDOT.

**Comment 141:** TMPs typically include operational changes that are implemented when necessary, such as police traffic control of intersections, temporary one-way streets and temporary parking restrictions. A TMP is not, however, typically a method of providing physical roadway improvements. While this office agrees that a TMP is required for this project, the TMP discussion offers no specifics and fails to identify the adverse effects triggered by the proposed TMP strategies. For example, the TMP identifies advising "background traffic...to avoid using the Cross Island Parkway near Belmont Park" (page 17-4). This strategy promotes diverting traffic from the CIP to local streets in the area, but does not provide any substantial mitigation to address this diverted traffic.

Similar to the DEIS, the FEIS fails to analyze or provide specific improvements to mitigate adverse impacts caused by the implementation of the TMP. The TMP assumes that traffic volumes on the Cross Island Parkway can be reduced by redirecting vehicles to alternative roadways, but does not provide an analysis of these alternative roadways to determine if available capacity exists or if mitigation measures are required. (VFP\_215)

NYAP and ESD have assumed that peak traffic that cannot be handled by the Cross Island Parkway will divert to other highway/parkway routes instead of local road systems. But neither NYAP nor ESD has attempted to verify that any of those other highway/parkway routes have any available capacity during peak conditions. There is no analytical support for the FEIS' conclusion that local roads will not be inundated by traffic as a result of the NYAP project. (VFP\_214)

The listing of alternate routes to the Cross Island Parkway, namely the Meadowbrook and Wantagh Parkways and the Seaford Oyster Bays Expressway, is not credible. Similarly, the east-west parkways are not directly relevant with regard to local street traffic, where are details identifying "alternate streets/roads?" The statement that the TMP demand strategy would divert 10 percent and 5 percent of Cross Island Parkway traffic is not supported by detail. (Gunther\_205)

**Response:** As discussed in the response to Comment 84, the objective of the mitigation is to encourage arena patrons to use mass transit, not drive to the Project Sites. A new LIRR Elmont Station would be provided along with demand management strategies in a comprehensive TMP, which would reduce the number of project-generated auto trips in the peak hours. The redirection of vehicles is not limited to just alternative roadways, but also to other time periods. Additionally, only a small percentage of background traffic (approximately 5 to 10 percent) would be diverted. Furthermore, these trips would be widely dispersed throughout the region over multiple highways.

While the FEIS acknowledges the potential that certain routes in the vicinity of the traffic study area may be susceptible to traffic diversions by drivers to avoid congestion, a key element of the TMP aimed at reducing the potential for traffic diversions onto sensitive local residential streets is for NYAP to partner with navigation app providers such as Waze to define local streets that could be designated as "unavailable" to through traffic during event arrival and departure periods so that through traffic would not be routed to them.

**Comment 142:** The TMP discussion also identifies a traffic monitoring program which would be conducted after the project is constructed and occupied to identify potential impacts and address them accordingly. While continued monitoring of traffic conditions around the proposed project is beneficial, deferring identification and implementation of improvements until after the construction of the project is contrary to the purpose of the EIS process. Physical improvements can take years to progress through design, property acquisition, and construction, during which time the impacts go unmitigated. Impacts associated with the proposed development must be identified prior to the construction of the project and mitigation measures implemented prior to opening of the project.

The FEIS also identifies that a traffic monitoring will be implemented as part of the TMP, but still does not identify the locations to be monitored or the

methodology for implementing physical improvements as a result of the project if they are identified through a future monitoring program. The FEIS should identify anticipated improvements so they can be implemented prior to the opening of the project. (VFP\_215)

**Response:** The objective of the mitigation is to encourage arena patrons to use mass transit, not drive to the Project Sites. The components of the Monitoring Plan are further detailed in the draft TMP (Appendix J of the FEIS). Specific locations to be monitored would be identified in consultation with stakeholders. Mitigation measures include a physical improvement to the transportation network—the new LIRR Elmont Station. The FEIS does not envision the need for major physical roadway improvements such as widening of the Cross Island Parkway, Hempstead Turnpike, or other local streets such as Plainfield Avenue, which are not feasible or desirable.

**Comment 143:** One of the mitigation measures identified in the TMP is to advise drivers of pending events at the arena and encourage them to seek alternate routes to the CIP. The TMP optimistically anticipates up to 10% of the existing traffic on the CIP is anticipated to be rerouted by these measures. An analysis of the alternative routes (such as the Northern State and Meadowbrook State Parkways) was not completed and it is unknown if these routes have the available capacity to accept the additional volume. Without a traffic analysis of the proposed alternative routes, it is unknown if this TMP is improving conditions or merely moving the problem to other roadways. Furthermore, directing motorists to ‘use alternate route’ does not only encourage drivers to utilize other highways and parkways, it also encourages the use of local streets as alternate routes, which would likely create additional unmitigated impacts on local roadways in the area. (VFP\_215)

**Response:** Please see response to Comment 141. Additionally, the Demand Management Strategies of the draft TMP (Appendix J of the FEIS) discusses how StreetLight data were used to identify the origin-destinations of through traffic using the Cross Island Parkway that could potentially divert to alternate routes. Examples of where this strategy has been successfully used for other sports venues in the United States are also included in the TMP. The estimate of the amount of projected diversions accounted for the available capacities on alternate routes.

**Comment 144:** The FEIS, even with the TMP, states that locations for a traffic monitoring plan will be developed in the future. It is not possible for the Villages to comment on the locations which should be monitored for traffic impacts are if they have not yet been developed. (VFP\_215)

**Response:** The draft TMP, a copy of which was included in Appendix J of the FEIS, includes a Monitoring Plan. The transportation agencies will develop the list of locations that should be monitored, and at that time, the TMP stakeholders, including the

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**Memorandum of Responses to Public Comments on the FEIS**

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Village of Floral Park, will have an opportunity to comment on those monitoring locations.

**Comment 145:** Will new shuttle bus services from Rockville Centre use local streets? (Gunther\_205)

**Response:** Chapter 17, “Mitigation,” of the FEIS describes the routes that shuttle buses to and from the Rockville Centre LIRR Station would operate along, which include Ocean Avenue, Nassau Boulevard, and Hempstead Turnpike.

**Comment 146:** Regarding the TMP and the “transportation manager,” what role and authority will the Village of Floral Park have in managing this activity? Is the Village of Floral Park among the stakeholders? How are traffic mitigation decisions regarding Plainfield Ave and other parallel Floral Park streets made in light of the State ownership of Plainfield Avenue? (Gunther\_205)

**Response:** The draft TMP, a copy of which has been included in Appendix J of the FEIS, identifies the roles and responsibilities of each of the stakeholders, of which the Village of Floral Park has been included. These stakeholders will be involved in further refining the demand management strategies in the TMP and the monitoring plan prior to the arena’s opening day. It is noted that Plainfield Avenue is under the jurisdiction of NCDPW, not NYSDOT as cited by the commenter.

**Comment 147:** At the ESD Board meeting on July 8, 2019, it was claimed the TMP can reduce the number of cars on the CIP from approximately 13,000 to 10,000. It won’t. (Mesnick\_115)

**Response:** The demand management strategies in the TMP are discussed in Chapter 17, “Mitigation,” of the FEIS and are further detailed in the draft TMP provided in Appendix J, which includes case studies of where these types of strategies have been successfully implemented at other sports venues in the United States.

**Comment 148:** I believe this project can be a success only if NYAP, ESD, NYRA & LIRR work seamlessly and constantly monitor the TMP to actively mitigate traffic impacts and I welcome the addition of the LIRR Elmont Station. How will the ESD hold the NYAP accountable to effectively manage traffic, update the TMP, make adjustments and coordinate a positive commuter experience in the long term? (Baggott\_039)

**Response:** The TMP includes a monitoring program that would be coordinated with stakeholders including NYRA, LIRR, NYSDOT, NYCDOT, and NCDPW. The TMP and other Project commitments will be enforced through the MEC and will be a condition of the lease.

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Comment 149:** On page 17-14 of the FEIS, shuttle buses: Please provide back-up data on the cumulative magnitude of all these buses on the nearby communities. (Gunther\_205)

**Response:** Appendix F of the FEIS summarizes the number of projected shuttle bus trips for each of the analyzed peak hours.

**Comment 150:** Who will pay for the TMP and for what duration? How can it believably come to meaningful conclusions/directives given it seemingly oversized management structure? How will its directions be enforced? What penalties accrue when it fails? (Gunther\_205)

**Response:** Implementation of the TMP, including monitoring, is the responsibility of NYAP for the life of the Project and will be enforced through the Project's MEC.

### *LIRR ELMONT STATION*

#### *Effectiveness as Mitigation*

**Comment 151:** Commenters feel that the distance between the new LIRR Elmont Station and the proposed arena (over ½-mile)—necessitating transfer from train to shuttle bus—would decrease the likelihood of visitors utilizing the new station. Distance from the Project Sites, the time associated with switching modes of transportation, the potential for inclement weather, the possibility of crowded shuttle buses, and Long Islanders' attachment to private auto were all cited as reasons why the LIRR Elmont Station will not be effective, or not effective as predicted in the FEIS. (Baggott\_TS5\_092, BCCA\_212, BPCC\_165, Emmel\_100, Forman\_220, Gormley\_188, Gorry\_219, McGuire\_191, McNally\_190, Mesnick\_115, Mesnick\_TS5\_085, Perelman\_187, Prymaczek\_021, Reisig\_194, Ronan\_126, Smith\_213, VFP\_169, Walsh\_022, Walsh\_157, White\_202)

**Response:** The new LIRR Elmont Station has been located adjacent to the existing LIRR tracks immediately north of the Belmont Park property. As discussed in Chapter 17, "Mitigation," of the FEIS, the new Elmont Station on the LIRR Main Line 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. The new station would also provide full-time service with reserved commuter parking, which would benefit local commuters who are unable to park at other existing train stations as well as arena patrons who would use the commuter parking on the mornings of arena events.

As described in Chapter 17, "Mitigation," of the FEIS, on days with scheduled events at the proposed arena, the new LIRR Elmont Station would be operated in conjunction with the existing LIRR Belmont Park Station on the spur. Two shuttle

trains would be provided between Jamaica Station and Belmont Park Station and the LIRR would select which trains operating along the Main Line would stop at the new Elmont Station (which would include trains along the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches). After an arena event, it is possible that up to four trains of 10 cars each could be operated out of Belmont Park Station to points east or west, which would enable riders to board a train immediately following an event with no need to board a shuttle bus. As it is anticipated that the two shuttle trains to and from Belmont Park Station would carry most of the riders traveling to/from points west, it is expected that the new Elmont Station would primarily be used by the riders traveling from points east prior to an arena event (as additional trains heading east could depart from the Belmont Park Station adjacent to the arena following an event). Therefore, most of the LIRR riders that would use shuttle buses would only need to do so during the pre-event period, when the arrivals of arena patrons are more spread out compared to post-event departures.

The projected LIRR ridership shown in Table 17-7 of the FEIS indicates that up to 2,748 riders would be anticipated to use the LIRR to travel to/from points east for a sold-out concert on a weeknight, which is substantially less than the 10,000 riders cited by one commenter and would not all occur within the same hour. As discussed in the response to Comment 179, the internal shuttle bus route operating between the LIRR Elmont Station and Site A could each accommodate a maximum of approximately 4,800 passengers per hour. As described in the Operations Plan of the draft TMP (Appendix J of the FEIS), these buses would operate on frequent headways of one to two minutes, which would minimize passenger waiting.

As described in Chapter 17, “Mitigation,” of the FEIS, as part of the TMP, 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. If it is determined that project-generated vehicles are parking in the surrounding neighborhoods on a recurrent basis, NYAP would coordinate with stakeholders, including local municipalities, to monitor parking conditions and prevent these areas from being impacted by arena events. Potential mitigation measures to address such impacts could include strict enforcement of existing parking regulations by ticketing and/or towing illegally parked vehicles, or by implementing new parking regulations in the affected areas.

**Comment 152:** I heard at the July 8 ESD Special Meeting that the LIRR Elmont Station would reduce the number of private cars from 83 to 48 percent of people coming to this site. Without understanding how that works, without the details, without an EIS, how can you make a statement like that? (Gunther\_TS5\_095)

How was the LIRR modal split of 30 percent determined for weekday games? This number seems high for commuter rail. Examples cited had both commuter

and rapid transit connections with lower fares and more frequent service. (Baggott\_039)

The FEIS states that the new LIRR Elmont station “will be used by up to 30 percent and 24 percent of the arena patrons.” How sound is this conclusion? Where is the back up? (Gunther\_205)

Having worked for years across from the Nassau Coliseum, I can state with first-hand knowledge that the majority of the Islander fan base attends games via their individual transportation and not mass transit. This will not change with the Belmont stadium and will only place additional strains on local roads with fans attempting to cut through towns like Floral Park in order to get from Hempstead Turnpike to Jericho Turnpike or to an alternate entrance to other major thoroughfares. (Musynske\_018)

The FEIS still predicts significant unmet demand on the Cross Island Parkway in addition to what appear to be overly ambitious LIRR mode share and Waze usage predictions. (Baggott\_039)

These people will not be taking the train to the stadium. (McCarren\_217)

The LIRR will still be underutilized for the arena events. Long Islanders drive! These numbers submitted of 2,000 passengers traveling by train are absurd. The only reason Islander fans took the train to the games at Barclay is because it was a direct ride and there is limited parking around the arena in Brooklyn. They did not have to board a shuttle bus and wait to get to the building. (Gorry\_219)

**Response:** Chapter 17, “Mitigation,” of the FEIS fully quantifies the effects of the mitigation initiatives including the new, full-time Elmont Station on the LIRR Main Line and implementation of the demand management strategies in the comprehensive TMP and describes how updated modal splits for arena patrons were developed to account for changes in travel patterns that would occur with the addition of the new LIRR Elmont Station. The projected LIRR modal split of 30 percent for a sold-out hockey game on a weeknight is consistent with the existing LIRR modal split of 22 to 46 percent for Islanders games at the Barclays Center.

Transit accessibility at Nassau Coliseum is not comparable to the Belmont Park location as the only mass transit services at Nassau Coliseum are provided by NICE Bus whereas the arena events at Belmont Park would be served by the LIRR (including service on the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches and shuttle service to Jamaica Station) as well as MTA and NICE buses. The FEIS includes a comprehensive TMP (Appendix J) that has been developed to implement demand management strategies that would reduce the reliance on private auto use by arena patrons and thus minimize the potential for traffic diversions onto local streets and provides examples of where these types of strategies have been successfully implemented at other sports venues in the United States. 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 153:** The Elmont LIRR station does not address the ability of commuters from the other LIRR lines who would need to travel to Jamaica in order to access the Hempstead Line. (Lyons\_146)

**Response:** The FEIS does not assume that all LIRR customers will have a one-seat ride to the new LIRR Elmont Station. This was accounted for in the modal split projections included in the EIS analysis. As described in Chapter 17 of the FEIS, “Mitigation,” NYAP would provide shuttle bus service to the Rockville Centre Station to accommodate arena patrons on the Babylon branch so that riders would not have to transfer at Jamaica.

**Comment 154:** The FEIS states that the LIRR is estimated to be used by 18% and 12% of arena patrons. Further on it states that driving by auto in the interim period is estimated at 57% and 67%. Where is all this backed up? Do the NYC, Town of Hempstead and Village of Floral Park traffic consultants concur? This analysis is missing. (Gunther\_205)

**Response:** Projected modal splits for arena patrons with implementation of the new LIRR Elmont Station and the demand management strategies of the TMP are discussed in Chapter 17 of the FEIS, “Mitigation,” and further detailed in the Demand Management Strategies of the draft TMP (Appendix J). The TMP includes modal splits with full-time operation of the new Elmont Station (with eastbound and westbound service) and during interim conditions with only eastbound service at the new Elmont Station. The TMP has been shared with, and reviewed by NYSDOT, NYCDOT, and NCDPW.

**Comment 155:** As far as the train station goes, I’ll never use it. That train won’t be direct to NYC, nor run every half hour, and the parking lot is not safe! With a train in use for commuters, you have to remember, the commuters will still be parked when your games are going on...and you don’t have enough parking now, you didn’t even allow for employees. Not to mention, people will park on our already overcrowded streets in order to avoid exorbitant parking fees. (Amato\_119)

**Response:** The new LIRR Elmont Station will provide direct service to New York City and the schedule will be similar to that at the existing Bellerose Station. As discussed in Chapter 17, “Mitigation,” of the FEIS, the decision of commuters to switch to use the new LIRR Elmont Station would be based on convenience (i.e., the availability of parking and proximity to their home). As shown in Comment 218, a number of commenters indicate that they would park at the LIRR Elmont Station due to difficulties in finding parking at other LIRR stations. On event days, NYAP would provide a security presence in each parking lot and on non-event days, NYAP would provide regular patrols by on-site security guards in the

parking lots. Regarding the adequacy of on-site parking and the potential for off-site parking on residential streets, please see the responses to Comment 198 and Comment 199.

**Comment 156:** How will a train station in Bellerose Terrace help the Elmont community and Belmont? Bellerose Terrace residents now take the train out of Bellerose. Also, there doesn't appear to be any parking. Would Elmont commuters be able to park in the Belmont lot and have shuttle buses to the trains? Off hours? Attendees at events would need to take a shuttle bus too. Who would want to do that? They'll drive! (Henry\_125)

This new station will NOT ease the commute of Elmont residents. They will have to make their way to Belmont, wait for a shuttle, take a bus ride to Bellerose, and hope they don't miss their train to the city or elsewhere. In order to ensure they make their train, they'll have to allow extra time to catch the shuttle. (Ronan\_126)

**Response:** 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. A total of 150 parking spaces in the North Lot would be reserved for use by commuters, which would be located closest to the new LIRR Elmont Station, enabling commuters to walk between their car and the station. The station would also include pedestrian access from Superior Road and would provide a shorter walking distance to homes in Bellerose Terrace compared to the existing LIRR Bellerose Station. Regarding the need for arena patrons at the new station to use shuttle buses to travel to the arena, please see the response to Comment 151.

**Comment 157:** We now hear about an LIRR station being built in the Bellerose area. That would require people getting off that train to get on a bus. That would mean buses to take a large number of people coming and going from events. It would mean the people from Belmont—from Elmont would have to go up through Floral Park, Plainfield Avenue across the border between the north lot and the Village of Floral Park to get to the station and back. That's in the EIS generated—all in itself. Why is there not time to look at that and study that in draft format before we get to this rush to judgment to build this project. I don't understand where we're going. (Gunther\_TS5\_095)

**Response:** The proposed shuttle bus routes and access between the arena and the LIRR Elmont Station would be internal to Belmont Park. Commuters from Elmont would access the commuter spaces via Hempstead Turnpike. For commuters driving to the new station, vehicular access to the North Lot would be provided via Exit 26D on the Cross Island Parkway or Red Road running along the west

side of the racetrack and arena (via the intersection of Locustwood Boulevard/Gate 5 Road) and would not involve vehicles traveling through Floral Park to access the station. The route that would be used by shuttle buses to travel between the new LIRR Elmont Station and the arena is described in Chapter 17, “Mitigation,” of the FEIS and the Operations Plan in the draft TMP in Appendix J of the FEIS. These buses would operate through the North Lot and along Red Road along the west side of the racetrack and would not travel along local streets.

**Comment 158:** I have not heard any real substantive types of improvements because building bus shelters and improving the bus lines, that’s not going to do it. Talk to Fred Wilpon and ask him how many people take the LIRR to a 50,000-person Met game. I would guess that it’s something like 10 percent or less. (Weissman\_TS5\_062)

**Response:** As discussed in Chapter 17, “Mitigation,” 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. While LIRR service is provided to Citi Field, the percentage of attendees using the railroad is not comparable to Belmont Park because the Mets-Willets Point Station is only served by one LIRR branch (Port Washington) and Citi Field is also served by the No. 7 subway line.

**Comment 159:** A realistic and thorough plan for handling the increased traffic has not been adequately developed. (Lyons\_146)

**Response:** The FEIS includes a comprehensive TMP that has been developed to implement demand management strategies and a new LIRR Elmont Station that would reduce the reliance on private auto use by arena patrons, as documented in Chapter 17, “Mitigation,” of the FEIS. The draft TMP is documented in full in Appendix J and includes case studies of where these types of strategies have been successfully implemented at other sports venues in the United States.

#### *Environmental Concerns*

**Comment 160:** Is the LIRR Elmont Station’s proposed location, adjacent to the Floral Park-Bellerose School property, the least impactful location? What alternative locations were explored? (VFP\_169)

The train station will abut the property of Floral Park-Bellerose School. What protection will be afforded to the school? (Grego\_177, McGuire\_191, Perelman\_187, Smith\_213)

The proposed LIRR Elmont Station commuter lot is adjacent to the Floral Park-Bellerose School. There is zero protection for our children from the traffic and noise this project will bring; just a chain-link fence. What I have seen about ideas to improve this barrier are simply not sufficient. (Fattorini\_209)

What buffers, such as construction of a berm, are necessary to ensure that the Floral Park-Bellerose School's sports field and playground are not negatively impacted by the LIRR Elmont Station? The currently proposed vegetated fence is clearly insufficient. (VFP\_169)

**Response:** The station location has been analyzed in FEIS Chapter 17, "Mitigation," and would not result in significant adverse environmental 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, generally following the property line between the North Lot and the Floral Park-Bellerose School. Additional fencing with privacy screening would be provided along Belmont Park Road from approximately Crocus Avenue to Mayfair Avenue to shield the adjacent Floral Park neighborhood from parking activities and car headlights in the North Lot. The gates to the fence would remain closed at all times, except for in the event of emergency evacuations. The new LIRR Elmont Station would have security cameras and NYAP would have security personnel, signage, and Closed-Circuit Television (CCTV) to monitor activities in the parking lots.

**Comment 161:** One thing not even mentioned or shown on the FEIS map proposal is the LIRR transformer power station in the north parking lot. Will that be moved to fit the train platform? (Grego\_177, Moriarty\_192, Ahrens\_208, BCCA\_212)

**Response:** The new station platforms can be accommodated without the removal of the existing LIRR substation referenced in the comment.

**Comment 162:** The lack of street parking and detours/closing of Superior Road near the LIRR Elmont Station construction site will make it next to impossible to get to and from my house. (Russo\_137)

I'm worried about truck trips associated with construction of the LIRR Elmont Station. (Reisig\_TS5\_051)

**Response:** As detailed in Chapter 17, "Mitigation," of the FEIS, Work Zone Traffic Control (WZTC) plans would be developed and implemented as necessary to ensure minimum disruption of traffic or pedestrian flow.

**Comment 163:** LIRR Elmont Station construction will make living near the site an extreme trial for at least the next three years. The noise pollution and intense lighting during the night, the lack of privacy will increase the problem. (Russo\_137)

**Response:** Chapter 17, “Mitigation,” of the FEIS includes an assessment of the potential for significant adverse impacts from construction of the LIRR Elmont Station. With respect to privacy, please see the response to Comment 168. Efforts would be made by LIRR to direct lighting away from residences during any potential nighttime work.

**Comment 164:** There are 13 homes on the south side of Superior Road where the new LIRR Elmont Station platforms would be built. Will these homes be taken by Eminent Domain? What measures would be taken to protect the privacy of the home owners if they are not taken by eminent domain? (Motlenski\_109, Russo\_130, Russo\_137)

What properties will be impacted by proposed train station? If so, were the home or business owners notified before the announcement? (BPCC\_166)

**Response:** The new LIRR Elmont Station would be built mostly within the LIRR right-of-way (ROW); no residential or business properties would be built upon and therefore would not require the use of eminent domain. 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. The environmental concern is whether a project would introduce uses that could offset positive trends in the area, impede efforts to attract investment to the area, or create a climate for disinvestment; such effects are not expected to occur with the LIRR Elmont Station, nor have such effects been experienced in other nearby neighborhoods with LIRR stations. The new station would provide improved transit access for residents, employees, and visitors to the area.

As described in Chapter 17, “Mitigation,” of the FEIS, visual screening barriers would be located along the north and south platforms of the new LIRR Elmont Station. On both platforms, an approximately 15-foot-wall and overhanging canopy of translucent material would extend the length of the platform. In addition, on the north side of the station a 14-foot-tall visual barrier of solid material would extend east of the station platform to the signal bridge, blocking views from the station of the backyards of the residences that line the south side of Superior Road. On the south side of the station, a visual barrier of solid material would extend east of the station platform to the signal bridge.

**Comment 165:** Commenters objected to building the station adjacent to Superior Road due to negative impacts on traffic, parking, noise, sanitation, air and light pollution, and public safety. (Baggott\_162, Ballen\_186, Barry\_195, Cohen\_145, Craig\_178,

Gelfo\_127, Grego\_177, Jara\_033, Khandaker\_136, Macko\_173, Munsch\_216, Muscarella\_226, Perelman\_187, Ramkissoon\_117, Ramkissoon\_144, Ramrattan\_118, Reisig\_TS5\_051, Rispoli\_122, Rizzo\_121, Russo\_130, Saunders\_134, Shea\_189, Singh\_Ramkissoon\_120, Viola\_111)

**Response:** The potential for environmental effects from the LIRR Elmont Station are presented and analyzed in Chapter 17, “Mitigation,” of the FEIS.

**Comment 166:** Why is the train station being constructed behind a school? Children should not be subject to noise and air pollution while they are learning and participating in after school activities. Their travels between home and school on foot will become more dangerous. (Ballen\_186, Baggott\_162, Craig\_178, Pombonya\_TS5\_048, Prymaczek\_021, Rispoli\_122, Rizzo\_121, Russo\_130)

Will there be an increase in police presence as well as security cameras in place? (Ahrens\_208, Craig\_178, Hartnett\_141, Moriarty\_192, Motlenski\_109, Russo\_130)

**Response:** The potential for significant adverse environmental impacts from the new LIRR Elmont Station is analyzed in Chapter 17, “Mitigation,” of the FEIS. The analysis found that the station would not result in any significant adverse environmental impacts, and would contribute to mitigating the Project’s significant adverse traffic impacts. The new LIRR Elmont Station would have security cameras and NYAP would have security personnel, signage, and Closed-Circuit Television (CCTV) to monitor activities in the parking lots.

The new LIRR Elmont Station would be expected to generate minimal pedestrian or vehicle traffic through the Bellerose Terrace neighborhood. It is anticipated that the new station would be used by commuters residing in Bellerose Terrace (who would walk to the new station) and Elmont (who would drive to the commuter parking in the North Lot and would not travel through Bellerose Terrace). Please see the response to Comment 160 regarding the potential impacts of the new station on the Floral Park-Bellerose School and 199 regarding the potential for parking on residential streets in the surrounding neighborhood.

**Comment 167:** If a station is being added in this area for access to Belmont, why does there also need to be any access from the Bellerose Terrace side? Why couldn’t the train stop at Belmont and only allow riders on and off from the Belmont side? (Barry\_195)

**Response:** Access is required from both sides of the station.

**Comment 168:** Homeowners will lose any semblance of privacy in their homes and back yards with a raised platform that places commuters in direct line of sight of our bedrooms, patios and yards. We will be on constant display for all who use the LIRR to and from the city and the island. (Russo\_137)

What measures will be taken to provide privacy to the homes directly adjacent to the station which will now have trains slowed or at a standstill with occupants able to view these properties? (Hartnett\_141)

LIRR platforms will literally be in our backyards affecting our privacy and safety, along with more train noise and pollution. (Grego\_177)

Will a wall be built on the back of the platform to give the bordering homes privacy and protection from people on the platform looking into our houses and keep them from throwing garbage into our backyards? (Craig\_178)

Will the homeowners who will be losing their privacy be notified of this project? (Moriarty\_192, Ahrens\_208)

**Response:** As described in Chapter 17, “Mitigation,” of the FEIS, visual screening barriers would be located along the north and south platforms of the new LIRR Elmont Station. On both platforms, an approximately 15-foot-tall wall and overhanging canopy of translucent material would extend the length of the platform. In addition, on the north side of the station a 14-foot-tall visual barrier of solid material would extend east of the station platform to the signal bridge, blocking views from the station of the backyards of the residences that line the south side of Superior Road. On the south side of the station, a visual barrier of solid material would extend east of the station platform to the signal bridge.

**Comment 169:** I am amazed that I do not see a hazardous testing report. (Ahrens\_156, Ahrens\_199)

**Response:** Chapter 17, “Mitigation,” of the FEIS summarizes the findings of a hazardous materials document review for the LIRR Elmont Station site, the full reporting of which is found in Appendix J of the FEIS.

**Comment 170:** During the 1970s Agent Orange was sprayed on the LIRR. Was our soil tested or were the soil tests done in other areas? Agent Orange is an air-borne toxin that has been found to cause birth defects and all types of cancer. The Elmont Station is adjacent to Floral Park-Bellerose School and the field where our children play. How do we know it is safe? Will construction release Agent Orange trapped in the soil into the air? The FEIS didn’t even address the potential health risks to the community. (Ahrens\_208, Ballen\_186, Barry\_195, BCCA\_212, BPCC\_165, Cohen\_145, Craig\_178, Grego\_177, Hartnett\_141, Jara\_033, Jones\_193, Macko\_173, Martinez\_140, Moriarty\_192, Motlenski\_109, Munsch\_216, Ramrattan\_118, Russo\_130, Russo\_137)

**Response:** As detailed in Chapter 17 of the FEIS, “Mitigation,” due to historical usages at and surrounding the LIRR Elmont Station site, prior to any development of the site, a Phase II Environmental Site Assessment would be undertaken in order to evaluate the need for specialized handling of soil and groundwater, if dewatering

is required. With the incorporation of the measures described, the potential for significant adverse effects related to hazardous materials would be avoided.

It should be noted that similar Phase II testing of subsurface conditions for the LIRR Third Track Project exhibited modest levels of contaminated materials. The testing program was conducted in accordance with NYSDEC's Division of Environmental Remediation (DER) document Technical Guidance for Site Investigation and Remediation (DER-10). With respect to Agent Orange, only low levels of Dioxin, the toxic component of the herbicide, was detected in some samples. The highest concentration recorded was 4.18 picograms/gram (pg/g) which is far below the U.S. EPA's regional screening levels of 100 pg/g. With a CHASP and engineering controls in place during construction the disturbance of such levels of contaminated materials would not endanger public health and welfare and therefore would not result in any significant adverse impacts.

**Comment 171:** A detailed analysis of the changes on the transportation network associated with the creation of an LIRR Elmont Station were not analyzed or reviewed. The presumption that commuter based ridership will not increase as a result of the additional station is unsubstantiated. Parking at many stations along the LIRR is severely constrained. Any commuters which transfer to the new Elmont Station will likely be replaced by other commuters who currently avoid using stations due to parking constraints. A detailed analysis is necessary to determine the impacts of a new station on the roadway and rail networks. (VFP\_215)

**Response:** Chapter 17, "Mitigation," of the FEIS includes analyses of the new LIRR Elmont Station, including the new vehicle trips that would be generated by commuters. This traffic analysis is conservative because it did not take credit for existing vehicle trips that could be displaced at other existing LIRR stations (e.g., Queens Village, Bellerose, Floral Park) by commuters shifting to the new Elmont Station, and concluded that the new LIRR Elmont Station would not result in any significant adverse transportation impacts.

**Comment 172:** Please provide quantification of number of buses, emissions and environmental impact on Floral Park from planned shuttle bus service between the new LIRR Elmont Station and the arena. This information is missing from the FEIS. (Gunther\_205)

**Response:** As described in the Operations Plan of the draft TMP (Appendix J of the FEIS), a fleet of eight, 40-foot zero emission electric buses would be used to provide shuttle bus service between the new LIRR Elmont Station and the arena, which would operate on the internal roadway network and would not utilize local streets in Floral Park. Chapter 17, "Mitigation," of the FEIS provides an assessment of the environmental impacts of the new Elmont Station and did not identify any environmental impacts associated with this internal shuttle bus route or shuttle bus usage generally.



**Comment 173:** What operational impacts will the new station have on other LIRR lines, such as the Hempstead line? (VFP\_169, McEnery\_180)

**Response:** The new LIRR Elmont Station is not anticipated to result in operational impacts to other trains on other branches. The new LIRR Elmont Station would be served full-time by the Hempstead Branch. As discussed in Chapter 17 of the FEIS, “Mitigation,” the operations plan for special events would be determined by the LIRR and trains selected to stop at the new station—which would include select trains on the Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches—would be chosen based on available capacity.

**Comment 174:** Commenters expressed concern about/asked why ESD did not schedule meetings with local residents, particularly those within Bellerose Terrace, to get their input on the LIRR Elmont Station. (Jones\_193)

**Response:** It would have been premature to have any public discussions prior to securing funding for the new station. A meeting was held with Bellerose Terrace residents shortly after the funding was in place.

**Comment 175:** The analysis of the effect of the new LIRR Elmont Station finds it would not result in adverse impacts to land use, zoning and community character, community facilities and utilities. Where is the backup for this statement? (Gunther\_205)

**Response:** The analyses presented in Chapter 17 of the FEIS, “Mitigation,” identify the information used to make the impact determinations for each technical analysis area.

**Comment 176:** Regarding Fig 17-1 of the FEIS, clarify vehicular traffic routes to the new LIRR Elmont Station. What traffic will circulate from Plainfield Avenue across Belmont Park Road? The FEIS does not show this. (Gunther\_205)

**Response:** As described in Chapter 17, “Mitigation,” of the FEIS, vehicular access to the commuter parking in the North Lot would be provided via Exit 26D of the Cross Island Parkway, which provides access and egress to both directions of the parkway, and Red Road running along the west side of the racetrack and the south and west sides of the arena, which provides a connection to the local street network at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road. As discussed in Chapter 11 of the FEIS, “Transportation,” the Plainfield Avenue entrance (Gate 8) would be closed and not accessible for vehicular access to the Proposed Project.

**Comment 177:** On page 17-44 of the FEIS, construction of the LIRR Elmont Station is “anticipated to generate only a relatively modest increase in construction related vehicle trips” How is this quantified? (Gunther\_205)

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Response:** Based on comparable station construction activities associated with the LIRR Third Track project, during peak construction activities it is expected that there would be a maximum of 10 to 15 truck trips distributed throughout the day. Work Zone Traffic Control (WZTC) plans would be developed and implemented as necessary to ensure minimum disruption of traffic or pedestrian flow.

**Comment 178:** The alternative emergency exit for the Floral Park-Bellerose School is through the Belmont Race Track property. Will this alternative emergency exit still exist if the train station is built? (Motlenski\_109, Russo\_130, Russo\_137, Moriarty\_192, Ahrens\_208)

**Response:** The alternative emergency exits would continue to exist with the new LIRR Elmont Station.

**Comment 179:** The use of shuttle buses to transport railroad passengers to the proposed arena and other venues included in the proposed project. From where will all these buses be coming and how will they travel to and from Belmont Park? If the buses are stationed at Belmont Park, where they will be housed, maintained and parked when not in use? Will there be infrastructure proposed for the shuttle buses at Belmont Park, given that the proposed railroad station will be operational 24/7? And is there the capacity for efficient shuttle bus service to transport fans and attendees at the start and end of every arena event, even with the incentives that are being offered? (Pombonya\_TS5\_048)

**Response:** It is anticipated that the internal electric shuttle buses would be stored at Belmont Park. The electric shuttle buses would be charged either in the North Lot or on Site B. Repairs would be made at an appropriate location off-site. When the arena is not hosting an event, shuttle bus service would also be provided between the new LIRR Elmont Station and the retail village. Therefore, internal shuttle buses would only operate when the retail village is open or when an arena event is taking place and would not be running 24 hours a day.

The Operations Plan of the draft TMP (Appendix J of the FEIS) includes detailed information about the internal shuttle buses serving the Project Sites, including the type of buses to be used, fleet size, and operating headways. The internal shuttle buses serving the North and East Lots were designed to accommodate the maximum number of patrons and employees that would use the shuttle buses during arena events or peak shopping periods. The internal shuttle bus routes operating between the LIRR Elmont Station and Site A and the North Lot and Site A could each accommodate a maximum of approximately 4,800 passengers per hour (based on a minimum headway of one minute and a capacity of 80 passengers per bus with standees). The internal shuttle bus route operating between the South and East Lots and the retail village could accommodate a maximum of approximately 2,400 passengers per hour (based on a minimum headway of 30 seconds and a capacity of 20 passengers per bus). As discussed in

the response to Comment 151, there would be less demand for passengers using the internal shuttle bus route to the LIRR Elmont Station after an arena event because up to four trains of 10 cars each could be operated east or west out of the LIRR Belmont Park Station adjacent to the arena.

**Comment 180:** I was looking for some mitigation of traffic on the Cross Island Parkway by widening and lengthening the entrance/exit lanes on/off the Cross Island Parkway as was seemingly done on the Meadowbrook Parkway near the Nassau Coliseum. I was surprised that I did not read of that and only saw some projections of a reduced car usage due to the new LIRR station. I am skeptical of that as the primary solution as Long Islanders are loathe to give up their cars. Thus, I wish such parkway improvements to the Cross Island Parkway could be included. (Mittler\_154)

The FEIS concludes that 90 percent of those driving to the site will arrive via the Cross Island Parkway. The FEIS further concludes that the Project cannot mitigate all impacted traffic segments of this 80 year old roadway. The FEIS provides no analysis or proof that major expansion of the Cross Island Parkway is not feasible within the project plan. Provide a full analysis of costs and benefits related to reconstruction of the Cross Island Parkway from LIE to the SSP. Increased capacity of the Cross Island Parkway must be developed to properly mitigate the traffic impact of this project. (Baggott\_162)

The Governor of New York has recognized the traffic congestion associated with Woodbury Commons, which receives over 13 million visitors a year, as requiring extensive interstate highway upgrades, yet the Cross Island Parkway directly adjacent to the Belmont Park project is not getting anything close to that kind of upgrading. (McEnery\_180)

“Widening of the Cross Island Parkway is neither practical nor reasonably feasible, and has been precluded as an option.” (FEIS Chapter 17 Page 17-3) What analysis determined that widening of the Cross Island Parkway is neither practical nor reasonably feasible? Was a cost estimate prepared for such an alternative that would fully mitigate unmet demand? (Baggott\_039)

**Response:** As described in Chapter 17, “Mitigation,” and Chapter 22, “Response to Public Comments,” of the FEIS, widening of the Cross Island Parkway is neither practical nor reasonably feasible as it would require reconstructing numerous overpasses and underpasses. The focus of the mitigation plan has been to promote mass transit access to the Proposed Project and to not include measures that may encourage additional auto use. A new, full-time Elmont Station on the Main Line 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. A comprehensive TMP, is expected to reduce the volume of peak hour vehicle trips, change travel patterns, and shift demand from cars to other modes of transit. This TMP is detailed and evaluated

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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in Chapter 17, and includes a comprehensive set of demand management strategies as well as conventional traffic engineering improvements.

**Comment 181:** At a December 10, 2017 presentation with the other bidder on the Request for Proposals at Elmont Memorial High School, NYAP stated that both a full time train station at Belmont and structural changes to the Cross Island Parkway were essential to the viability of their Project. Senator Comrie at a Joint Hearing raised the same point regarding the need for expansion of the Cross Island Parkway in relation to the Governor's development proposals for Belmont Park. A copy of the Transcript from the Joint Hearing is attached as Exhibit B. Consequently, although a train station might be part of a proposed solution, it is not the entire solution. Structural changes to the CIP to provide extra capacity still appear necessary as the FEIS fails to suggest other realistic options to mitigate the negative traffic impacts associated with this Project. Since New York State is not proposing to undertake the required structural changes to the CIP, the only feasible alternative is to significantly scale back this Project to avoid the negative impacts to the surrounding communities. (VFP\_169)

**Response:** ESD's goal is to promote mass transit access to the Proposed Project and to not include measures that may encourage additional auto use. In addition, it is neither practical nor reasonably feasible to widen the Cross Island Parkway (see response to Comment 17-52 in Chapter 22 of the FEIS). The FEIS does include other realistic mitigation options to mitigate those negative traffic impacts associated with the Project (see Chapter 17 and Appendix J of the FEIS),.

**Comment 182:** There are ways to improve traffic flow and this item needs to be explored by NYS as well as at the Federal Level. It is 2019 and it is time that we use technology to improve the efficiency of our roadways rather than to solely generate income. The new Train Station will assuredly improve the situation and has been needed for some time, but there are fears that this won't be enough. This concern of myself and others is a valid one, but it should in no way shape or form be a deal breaker regarding this construction project nor should it delay the project whatsoever. (Colombo\_026)

**Response:** Comment noted.

**Comment 183:** Transportation analyses in Chapter 17, "Mitigation," are based only upon the completion of the new LIRR Elmont Station. What about the 2 year minimum interim period? (Gunther\_205)

**Response:** Traffic conditions during the period when only eastbound service at the new LIRR Elmont Station would be available are assessed in the "Interim Conditions" section of Chapter 17, "Mitigation," of the FEIS and are also discussed in the draft TMP (Appendix J).

*Operational Questions/Concerns*

**Comment 184:** The LIRR platform constructed on the Main Line, will require all of those transit commuters to wrestle with the people parking in the North lot for seats on the same trams. That proposed platform would be located on the railroad's Main Line and will not have the luxury of queuing trains at the end of each event (a la Atlantic Terminal). Trains will run every 30 to 60 minutes from the station. Assume that 4,000-5,000 fans avail themselves of the post-game train service? Those rail commuters will get dropped off near the station by their parking lot tram. But where do they stand on a frigid January night as they await their connecting LIRR train? (Alleci\_028)

What will happen if there is a delay in service and crowds begin forming? (McEnery\_180)

**Response:** As described in the response to Comment 151, it is expected that the Elmont Station would carry most of the riders traveling to/from points east prior to a game. Up to four trains of 10 cars each could be operated east or west out of the Belmont Park Station following an event, allowing passengers to immediately board empty trains waiting at the station, similar to what can be done at Atlantic Terminal. The projected LIRR ridership shown in Table 17-7 of the FEIS indicates that up to 2,748 riders would be anticipated to use the LIRR to travel to/from points east for a sold-out concert on a weeknight, which is substantially less than the 4,000-5,000 riders cited by the commenter. Furthermore, as discussed in Chapter 17, the shuttle bus service operated between the Elmont Station and Site A would be separate from the shuttle bus route that would serve arena patrons parking in the North Lot so LIRR riders would not be using the same shuttle buses as arena patrons parking in the North Lot. Please also see response to Comment 195.

**Comment 185:** How will one tell the difference between commuters' cars and game attendees' cars? (McNally\_190)

The assertion that this station would become a "commuter station" for area residents is a fallacy. Resident-restricted parking cannot be designated on state land. Even if 400-500 spots in the North Lot were designated for "commuters," those spots are open to all commuters, whether they be from West Hempstead, New Hyde Park or Little Neck. (BPCC\_165)

**Response:** The vehicles of commuters and arena patrons would be differentiated by the locations they could park in the North Lot. As described in Chapter 17, "Mitigation," of the FEIS, a total of 150 parking spaces located closest to the new LIRR Elmont Station would be reserved for use by commuters. It is anticipated that these parking spaces would be reserved for residents with commuter parking permits, which would be made available for purchase by Town of Hempstead. Other commuters or arena patrons would park in other areas of the North Lot.

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Comment 186:** According to the station renderings, there is only one overpass connecting the westbound and eastbound platforms. Will that provide safe and sufficient capacity for those who have to cross over? (McEnery\_180)

**Response:** The pedestrian overpass between the eastbound and westbound platforms would be designed to safely accommodate the projected volume of riders that would use it.

**Comment 187:** Will the LIRR Elmont Station be in compliance with the Americans with Disability Act and include bathrooms? (McEnery\_180)

**Response:** As discussed in Chapter 17, “Mitigation,” of the FEIS, the new LIRR Elmont Station would be fully ADA accessible. No bathrooms are proposed at the new station.

**Comment 188:** Which trains from the Hempstead, Oyster Bay, Port Jefferson and Ronkonkoma branches will be serving the new Elmont LIRR station rush hour and non-rush hour? (McEnery\_180)

**Response:** The new LIRR Elmont Station would be served full-time by the LIRR’s Hempstead Branch which currently provides half-hourly service during peak hours and hourly service during the off-peak hours. This is the same level of service that is provided to the LIRR’s adjacent Queens Village and Bellerose stations. As described in Chapter 17, “Mitigation,” of the FEIS, during times of an arena event, trains selected to stop at the new LIRR Elmont Station would be chosen by the LIRR based on available capacity (which would include trains on the Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches). The LIRR would provide continuous Hempstead Branch-level service during times when there are no arena events taking place.

**Comment 189:** How many LIRR riders from Port Washington, Speonk, Babylon, Long Beach, Far Rockaway and West Hempstead branches will still have to change at Jamaica before being able to board an east-bound train to reach the Belmont Islanders Arena? (McEnery\_180)

**Response:** The LIRR riders on the Babylon Branch would be accommodated by the shuttle bus operating to and from the Rockville Centre Station. Riders between Babylon and Speonk would likely utilize the Ronkonkoma Branch. The analysis assumed that only a small number of riders on the other branches cited would use the LIRR and transfer at Jamaica to access the arena.

**Comment 190:** Who will be responsible for building and maintaining the parking lot adjacent to the new Elmont LIRR station for commuters and those who want to attend both day and night events at the Islanders Belmont Arena? (McEnery\_180)

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## Memorandum of Responses to Public Comments on the FEIS

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**Response:** As part of the Proposed Project, the North Lot (which would include parking for Project visitors as well as LIRR commuters), would be resurfaced and restriped by the Applicant. As noted in the response to Comment 9-30 in Chapter 22 of the FEIS, the Applicant would enter into an agreement with the FOB and NYRA that would address the responsibility for maintenance of the North Lot.

**Comment 191:** What will the parking fee be? Will any parking fees be shared directly with the hosting municipalities, including Floral Park and Bellerose? Will residents of the hosting communities be provided preference or reduced parking fees? Will LIRR commuters be offered weekly or monthly discounted parking fees? (McEnery\_180)

**Response:** The parking rates for the dedicated LIRR commuter spaces have not been set at this time. NYAP and ESD intend to work with the Town of Hempstead to set the pricing and management of the dedicated LIRR spaces.

**Comment 192:** Where will the pedestrian entrance to this station be, just via the North Lot of Belmont Park? (McNally\_190)

**Response:** As described in Chapter 17, “Mitigation,” of the FEIS, pedestrian entrances to the new LIRR Elmont Station would be provided from the North Lot and Superior Road in Bellerose Terrace.

**Comment 193:** As the Elmont LIRR station will be constructed in two phases, patrons traveling by LIRR from the east will not have access to the Project site until at least 2023 - probably later, as the second half will be deferred until after completion of the Third Rail project. a) This will be disruptive to the Village of Floral Park in the interim. b) Why is this not included in traffic impacts to the adjacent communities? c) Where is the plan to address this? (Gunther\_205)

**Response:** Chapter 17, “Mitigation,” of the FEIS includes an analysis of the interim condition where the new LIRR Elmont Station would only provide service in the eastbound direction.

**Comment 194:** Regarding interim conditions pending the completion of the Elmont LIRR Station in 2023 or more probably later: What is the proposed path of the shuttle buses and other NICE buses from other LIRR stations? Is the Floral Park station one of the proposed shuttle bus departure points? If not, what protects the Village of Floral Park from it being so designated in the future? The FEIS fails to address the impact, especially of pollution and traffic. (Gunther\_205)

**Response:** As described in Chapter 17, “Mitigation,” of the FEIS, during interim conditions shuttle bus service would be implemented between a station on the LIRR Main Line (e.g., New Hyde Park or Mineola) to intercept arena patrons traveling to/from portions of Nassau and Suffolk Counties that are served by the

Huntington/Port Jefferson and Ronkonkoma branches so that riders would not have to transfer at Jamaica and backtrack to Belmont Park. It is anticipated that shuttle buses operating between a station and the LIRR Main Line would operate streets providing the most direct travel route (e.g., Jericho Turnpike, Plainfield Avenue, and Hempstead Turnpike). As the Floral Park Station is not served by trains on the Huntington/Port Jefferson and Ronkonkoma branches, it would not be utilized to provide shuttle bus service to the arena during interim conditions.

**Comment 195:** A portion of available parking spaces (400-500 spots?) in the North lot will be reserved for the residents of Elmont, Bellerose and Floral Park as their “commuter lot.” Presuming the local commuters come home from work between 6 and 7 p.m., how will they battle with the fans trying to enter the lot at that exact time for each of the 220 proposed events in the arena each year? (Alleci\_028, McEnery\_180)

**Response:** As described in Chapter 17, “Mitigation,” of the FEIS, a total of 150 parking spaces would be reserved for commuter parking in the North Lot. When commuters are returning to their cars on a weekday evening prior to an event, crowd marshals and parking and traffic attendants would be used to direct commuters walking to their vehicles and when driving to exit the lot. A staffing plan for the North Lot is provided in Figure 51 of the Operations Plan of the draft TMP in Appendix J of the FEIS. In addition to commuter vehicles, empty ridesharing vehicles would also be departing the North Lot prior to events after dropping off passengers.

**Comment 196:** Do you know if there will be parking permits available for Elmont residents at the new station? We aren’t allowed to park in most spots at Valley Stream and Floral Park, the 2 stations we’re sandwiched between. (Schneider\_042)

Will Bellerose Terrace public parking status be changed to a Special Parking District? (Hartnett\_141, Motlenski\_109, Russo\_130, Moriarty\_192, Ahrens\_208)

Like Floral Park and Valley Stream, we deserve our own full service train station with parking passes for commuters provided by the Town of Hempstead. It must be clearly understood that Elmont does have a growing population that commutes daily to and from Manhattan and the other boroughs. (Johnson\_135)

The train station and commuter parking lot near the Main Line is the best solution to provide direct 24/7 service to Belmont Park and the community, as we will get our own train station to park at instead of hunting for parking at other LIRR stations since we do not live in their village to have parking permits. (Johnson\_101)

**Response:** As described in Chapter 17, “Mitigation,” of the FEIS, it is anticipated that commuter parking permits in the North Lot would be made available for purchase by Town of Hempstead residents, including those living in Elmont.



**Comment 197:** The proposed 150 parking spaces allocated for commuters in the North Lot (~5% of the lot) seems inadequate to meet future commuter demand. Has an analysis been done to analyze what the commuter demand at the station would be? Are provisions available for additional commuter parking spaces to be allocated in the 2,860 space North Lot if demand warranted. (Baggott\_039)

**Response:** The number of reserved commuter parking spaces in the North Lot was based on commuter ridership projections at the new Elmont Station prepared by the LIRR and discussions between the LIRR, ESD, and NYAP. As discussed in Chapter 17, “Mitigation,” of the FEIS, additional commuter parking spaces would be available to arena patrons who would use the commuter parking in the North Lot on the mornings of arena events. Additionally, the TMP would include a monitoring plan that would be used to measure the extent of on-site parking accumulation, including cars parking in the North Lot and commuting via the new LIRR Elmont Station.

**Comment 198:** This train station will take up valuable parking spaces that are already scarce for a project of this scale. What other alternatives will be granted to this project that can house twenty thousand (20,000) people at any given time with only 4,000 parking spots, now even less? (Motlenski\_109, Russo\_130)

**Response:** Chapter 17, “Mitigation,” of the FEIS provides an assessment of parking conditions with the addition of the new LIRR Elmont Station. While the new 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. Furthermore, the addition of the new LIRR Elmont Station and the implementation of the demand management strategies included in the TMP would result in a net reduction of parking demand by arena patrons during events.

**Comment 199:** How will LIRR tickets be checked at the proposed Elmont Station to prevent arena patrons from parking in Bellerose Terrace and walking to the arena complex? Will an attendant be stationed at the station entrance before and after all arena events? What would prevent arena patrons from showing LIRR monthly or low fare tickets to circumvent that restriction? (Baggott\_039)

But the train station will allow people to park in Bellerose Terrace and walk over the train platform and get on the said buses to the stadium. (Gormley\_188)

Will there also be an entrance via Floral Park or Bellerose Terrace streets? If so, it is guaranteed that fans will park on the streets of Floral Park and Bellerose and simply walk through the station to the parking lot. What’s to stop them from doing so? (McNally\_190)

**Response:** During times of arena events, staff would be provided to check LIRR tickets at a designated location, such as at the northern entrance from Superior Road or the

southern exit to the North Lot. As described in Chapter 17, “Mitigation,” of the FEIS, as part of the TMP, 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. If it is determined that project-generated vehicles are parking off-site in the Bellerose Terrace on a recurrent basis, NYAP would coordinate with stakeholders including local municipalities to monitor parking conditions and prevent these areas from being impacted by arena events. Potential mitigation measures to address such impacts include strict enforcement of existing parking regulations by ticketing and/or towing illegally parked vehicles, or by implementing new parking regulations in the affected areas.

**Comment 200:** What fare zone will the new Elmont Station be in and how will mode share be affected by the price of LIRR fares? Will parking be priced and limited to encourage commuter rail usage? (Baggott\_039, McEnery\_180)

**Response:** It is anticipated that the new LIRR Elmont Station would be located in LIRR Fare Zone 3 or LIRR Fare Zone 4. In either instance, LIRR fares would be substantially less than the cost of on-site arena parking so as to encourage the use of transit by arena patrons.

**Comment 201:** It is concerning that the LIRR Elmont Station will not fully open until 2 years after the arena opens. How does East Side Access preclude Mainline trains from stopping at a full Elmont Station if it was opened with the arena? Should opening of this project not wait until all mitigation measures can reasonably be met? (Baggott\_039)

**Response:** Chapter 17, “Mitigation,” of the FEIS indicates that westbound train service at the new LIRR Elmont Station would be accommodated following the completion of the LIRR Third Track and East Side Access projects. Construction activities associated with the Third Track project would prevent westbound trains from being able to stop at the north platform. Chapter 17 provides an assessment of transportation conditions during interim conditions when service at the new LIRR Elmont Station would be available in the eastbound direction.

**Comment 202:** The proposed station could not even get on the MTA’s drawing board until the East Side Access project is completed (currently projected for 2022). How long would it then take the MTA to do proper analysis, resolve abatement issues and actually build the station? (BPCC\_165)

**Response:** The commenter’s assertion is incorrect. Construction of the new LIRR Elmont Station could occur concurrently with construction activities associated with the East Side Access project. However, the full operation of the station to allow trains from other branches is dependent upon upgrades associated with East Side Access.

**Comment 203:** Based on current “shovel-in-the-ground” estimates from NYAP, the Islanders Arena will open without the new train station. What happens after 3-to-4 years if attendance dwindles as frustrated Islanders fans quickly tire of the interminable travel issues on the Cross Island, and then the tailgate-to-the-tram-to the-arena imposition? (BPCC\_165)

**Response:** For the first two years that the arena will be open, there will be LIRR service to the Belmont Park spur station that exists today, plus LIRR service to the new Elmont station only in the eastbound direction since only the southern platform will be built. Full operation of the Elmont station cannot occur until East Side Access and the Third Track projects are completed. This condition and resulting impacts are addressed in Chapter 17, “Mitigation,” of the FEIS (see “Interim Conditions”).

**Comment 204:** The metal train bridge will need to be rebuilt that crosses the Cross Island Parkway. Is this a backdoor to extend the Third Track project into our community after we successfully fought to not have the area disturbed because of the direct health risk to the children who attend Floral Park-Bellerose School? (Motlenski\_109, Russo\_130)

What about the integrity of the metal RR bridge over the Cross Island Parkway? Will it be strong enough to support the structure, trains and traffic? Will the bridge be reinforced or rebuilt? What about the impact on that very busy roadway? (Russo\_137)

**Response:** The new LIRR Elmont Station is provided as Project mitigation and is independent from and not part of the Third Track project. The existing LIRR bridge over the Cross Island Parkway does not require replacement or reinforcement. The new LIRR Elmont Station platform is required to be designed and constructed with its own structural supports completely independent from the existing bridge. Activities related to construction of the new platforms and LIRR utility relocation/installations on the bridge may require implementation of maintenance and protection of traffic provisions, including temporary lane closures on the Parkway which would be coordinated with NYCDOT.

**Comment 205:** I’m concerned that branding the “Elmont Station” located in Bellerose Terrace will cause major confusion along with major traffic for Superior Road, which can’t handle it. People who want to get off in “Elmont” will realize they are in Bellerose terrace and will have to take a cab or Uber which will cause more issues. (Macko\_173)

**Response:** Appropriate wayfinding signage will be provided to assist passengers exiting the new LIRR station.

**Comment 206:** The State of New York and its political subdivisions must agree and commit to provide at least the same, if not greater amount of service for its Floral Park and Bellerose stations, which must be imbedded within any mitigation plan and not just a promise. It is true that the ‘most impactful mitigation measure’ may well be the new MTA LIRR train station but that is a two-edged sword. Assurances must be provided to Floral Park and Bellerose that those two LIRR stations remain full time stations with the same if not more scheduled service to each. (McEnery\_180)

**Response:** As detailed in Chapter 17 of the FEIS, “Mitigation,” existing levels of commuter service would be maintained at other LIRR stations (e.g., Queens Village, Bellerose, Floral Park).

*Station Financing*

**Comment 207:** The location of the LIRR Elmont Station and the potential costs to taxpayers gives me pause. This doesn’t feel like an investment in infrastructure. It feels like an overload of what’s in existence. (Smith\_TS5\_079)

Why would a station be needed in that location when there is already a Bellerose station just a few blocks down the road? There is not a public necessity for another RR station as the current one is within walking distance. (Russo\_137)

There is currently LIRR Stations in Bellerose Village and adjacent Queens Village and I would question the wisdom of adding another Station along this corridor. The residents of Elmont need a train station and more development but this will not serve them in any way. (Saunders\_134)

You are planning to put a new LIRR station in a residential neighborhood that is currently being serviced by the Bellerose Train Station. How does this help Elmont residents? It’s no closer than the Floral Park or Bellerose station for them. I have seen nothing to indicate these questions have been explored much less answered. (Talty\_153)

Bellerose Terrace residents utilize the existing Bellerose Village or Queens Village train stations which are already in close proximity to our neighborhood (.5 mile in either direction). We certainly do not need a third station. (Barry\_195)

The proposed Elmont LIRR station is a redundant commitment of resources along a portion of the LIRR Main Line which is already amply served by stations at Queens Village, Bellerose and Floral Park. An additional station here would do little to attract new riders from the surrounding community, would cannibalize riders from Queens Village and Bellerose, and would force the railroad to essentially make stops along this stretch at subway-like intervals, slowing operations. The shuttle bus connection to Belmont could easily be made at Floral Park or Queens Village. (Seims\_196)

**Response:** The new LIRR Elmont Station would not only provide access to the Project via shuttle bus services, but it would provide parking for commuters from Elmont.

As discussed in Chapter 17 of FEIS, “Mitigation,” the new full-time Elmont Station would serve arena patrons using the Hempstead, Huntington/Port Jefferson, Oyster Bay, and/or Ronkonkoma branches, and thus provide direct service to and from Nassau and Suffolk Counties. This is expected to generate a significant shift of auto trips to LIRR and help reduce potential adverse traffic impacts and would not result in new significant adverse impacts in other environmental impact subject areas. The new LIRR Elmont Station would also relieve pressure on the existing Belmont Park spur station during major events like the Belmont Stakes and provide critically-needed redundancy if there is a service disruption to the spur, as occurred in 2018. The Project did not identify shuttle bus service from either Bellerose or Queens Village stations as this would further exacerbate traffic conditions in the area. As described in Chapter 22 of the FEIS, “Response to Public Comments,” 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 208:** Governor Cuomo released a press release from earlier that included analysis of the Long Island Rail Road station from BJH Advisors, saying that LIRR would be funded only \$30 million by NYAP and \$74 million by the taxpayers of New York State. But yet Newsday today said the project developers have agreed to pay \$97 million. So I’m just wondering which is correct? Are they paying \$97 million or are they paying \$30 million for the train station? Is \$100 million a realistic number to construct a sufficiently sized, climate-controlled station and platforms across the three lines of track? A full review of the estimated costs must be done to verify that the low estimate will not impact taxpayers later. (Alfonsi\_TS5\_086, Alleci\_028, BCCA\_212, BPCC\_165, BPCC\_166, Fauss\_197, McEnery\_180)

At the exact juncture where the proposed station will be erected, the LIRR is currently four tracks wide. Any station will need to span that space, plus provide a sheltered platform to accommodate up to 5,000 people leaving events on cold winter’s nights. (In February 2016, it was estimated that 5,000 fans per night utilized the LIRR to reach the Barclay’s Center for Islanders games). (BPCC\_165)

**Response:** The Applicant is providing funding for \$97 million of LIRR improvements. A total of \$30 million would be provided by NYAP between 2019 and 2021 and the remaining \$67 million would be comprised of annual payments made by NYAP as annual payments over 30 years. The \$105 million cost estimate for LIRR improvements was prepared by the LIRR and includes the cost associated with constructing the new LIRR Elmont Station (consisting of high-level platforms with an overhead canopy on the north and south sides of the tracks, the pedestrian overpass between the two platforms across the existing four tracks on the Main Line, and elevators) as well as upgrades to the existing LIRR Belmont spur.

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Comment 209:** I'm told this train station is now slated for Belmont and neighboring community, not Elmont. That is a no no and it reminds me of a \$2 million check that was given to Elmont to take the awful blight on Hempstead Turnpike from the County line to Squirrel Road and was withdrawn by the Empire State Development Corporation. I was at that meeting with the \$2 million check that was given to us. Is that what you want to do with the train station? Please do not try that again. (Stowe\_TS5\_090)

**Response:** The Applicant, ESD and LIRR are committed to constructing the new LIRR Elmont Station as a mitigation measure for the Proposed Project.

**Comment 210:** Will the station be subject to naming rights similar to the Barclay Center at Atlantic Avenue or the NY Mets at Willets Point? Will the NY Islanders or Value Retail Bicester be charged for any such naming? Will the new station's naming rights be put out for competitive bidding? (McEnery\_180)

**Response:** For more information on MTA's station naming rights program, visit: <http://web.mta.info/business/station-naming-rights.htm>

### *General*

**Comment 211:** When will the MTA release the study it conducted of the Belmont station? It was expected to be completed in September of 2018 and has not been made public. Has it conducted a similar study about what it would take to link to the AirTrain? (Fauss\_161)

**Response:** An anticipated release date for the report has not yet been set.

**Comment 212:** While the MTA has proposed building a full service LIRR station to provide mass transit options to Belmont Park, the MTA could easily construct such a station near the Nassau Coliseum were the Islanders to return there full time. (Forman\_220)

Extending the train to its current location with year round service and offering the local people a park & ride makes a lot more sense than the proposed Elmont Station. (Bessozi\_176)

**Response:** Comment noted.

**Comment 213:** Commenters questioned or objected to the new LIRR station being called the "Elmont Station" when an entrance/exit will be in Bellerose Terrace. Commenters feel it is a mischaracterization. (Ballen\_186, Munsch\_216, Russo\_130, Prymaczek\_021, Russo\_137, Schneider\_042, Shae\_189, Smith\_213, Ronana\_126, Viola\_111)

**Response:** Comment noted.

**Comment 214:** This new station is also supposed to be the answer to the requests of Elmont residents for their own train station; is it fair to them to situate it in another community? (Ahrens\_208, Ballen\_186, Barry\_195, Cohen\_145, Hartnett\_141, Lonergan\_198, Martinez\_140, Moriarty\_192, Motlenski\_109)

The “Elmont” station is practically in the backyard of many Bellerose Terrace homes. There is no room for such a development project in this area. They should reconsider toning down this project even further than they already have. (Cohen\_145, Hartnett\_141, Martinez\_140, Motlenski\_109)

**Response:** The LIRR Main Line tracks are located immediately north of the Belmont Park property on the LIRR branch most proximate to the Elmont community. Therefore, the new LIRR Elmont Station has been located adjacent to these tracks to provide new direct train service to/from points east and additional train service to/from points west. The new station would provide full-time service with reserved commuter parking, which would benefit local commuters, including those from Elmont, who are unable to park at other existing train stations as well as arena patrons who would use the commuter parking on the mornings of arena events. Vehicular access to the commuter parking in the North Lot would be provided via Red Road which provides a connection to the local street network at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road, or Exit 26D of the Cross Island Parkway, which provides access and egress to both directions of the parkway. This new station would also provide additional transit service to the Project Sites, and is estimated to divert thousands of arena patrons from using their cars to public transportation.

**Comment 215:** If the Elmont Station is proposed as an amendment to the Third Track project, how will it meet environmental impact statement requirements under SEQRA? How will the Third Track project contractors fit this in to an already large contract which includes 50 major activities and already costs \$2.6 billion. (Fauss\_161, Fauss\_197)

**Response:** The LIRR Elmont Station development is independent from and not part of Third Track project. Because the Elmont Station is being constructed as mitigation for the Proposed Project, its impacts are analyzed in Chapter 17, “Mitigation,” of the FEIS. As the agency charged with constructing the new station, LIRR is an involved agency in connection with this FEIS.

**Comment 216:** Why not spend the money on rerouting the Belmont spur to the main line and redevelop that Station? (Perelman\_187)

The community would be better used by extending the Belmont spur to the Elmont end of the Belmont property and running more trains to that station (that would actually be in Elmont). (Lonergan\_198)

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Response:** The LIRR studied the option of providing full-time service at the Belmont Park Station and determined that it would create severe negative impacts to LIRR operations system-wide. The Belmont Park spur and its infrastructure limitation do not allow for thru-service and full-time service would require dedicated fleet as well as potential service cancellations in order to allow trains to cross over the Main Line tracks in regularly scheduled intervals. The LIRR can only provide special event service to the existing Belmont Park Station.

**Comment 217:** There exists an alternative to the LIRR Elmont Station which would attract more people to the Project. Extending the Atlantic Terminal-Jamaica scoot service (which will begin when East Side Access is open) to Hollis, Queens Village, Belmont Park, and a new Elmont station at Plainfield Avenue and Hempstead Turnpike will 1) open a new market of approximately 18,000 residents to the railroad, 2) actually extend the railroad to Elmont and its commercial core (unlike the proposed station, which is nowhere near Elmont), 3) provide half-hourly service to both Belmont Park and Elmont proper, and 4) open up a shuttle of limited utility to daily commuters to a much wider group of commuters. (Seims\_196)

**Response:** The location of the new Elmont Station is on the existing LIRR Main Line adjacent to Belmont Park and is the location that LIRR determined to be feasible. The location suggested by the commenter at Plainfield Avenue and Hempstead Turnpike is not located near any existing train tracks.

### *General In Favor*

**Comment 218:** Commenters expressed support for the prospect of the new LIRR Elmont Station. Reasons cited included its importance in reducing traffic, improved quality of life for residents, the value it brings to local residents and commuters, its role in generating economic growth opportunities, and its importance to the success of the Project. (Adams\_009, Appel\_027, Cohen\_011, Chung\_174, Finnegan\_008, G\_129, Gillen\_TS5\_082, Goldberg\_201, Goldman\_015, Herbst\_TS5\_069, Isserlis\_041, Kaminsky\_TS5\_054, Kaplan\_TS5\_055, Kerr\_016, Kokura\_TS5\_076, Kuprian\_037, Laron\_211, Lunenfeld\_112, Mannucci\_034, Philips\_TS5\_058, Sacco\_038, Singer\_019, Tartaglione\_032, Teta\_013, Teta\_044, Tyburski\_148, Wallace, Jr.\_171, Williams\_006, Witter\_142)

**Response:** Comment noted.

### *General Opposed*

**Comment 219:** In addition to specific concerns, commenters expressed general opposition to the new LIRR Elmont Station. (Mchale\_116, Phillips\_TS5\_081, Mchale\_116, Russo\_130, Russo\_137, Burnacz\_138, Scaramuccia\_124, Talty\_153, Grego\_177, Craig\_178, Ballen\_186, Perelman\_187, Ramkissoon\_117)



**Response:** Comment noted.

## **CUMULATIVE IMPACTS**

**Comment 220:** Requests for more information regarding NYRA plans to redevelop the grandstand and adjacent sites have not been satisfied. (Baggott\_039)

**Response:** Although the Proposed Project is separate from any activity that may be undertaken by NYRA at Belmont Park Racetrack, ESD and NYAP have been coordinating throughout the environmental review process to understand NYRA's proposed improvements in order to assess the potential for cumulative effects of NYRA and NYAP construction and operations. 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.

**Comment 221:** The FEIS still fails to assess the cumulative impacts of the NYAP project and NYRA's planned improvements, as described in the secret 2016 NYRA Master Plan that was widely distributed to State officials, and verified in multiple subsequent NYRA statements and other sources. The FEIS just speaks past this improper segmentation, and fails to address the larger elephant in the room. The recent disclosure of the secret NYRA Master Plan demonstrates that the entire RFP process had a predetermined outcome. (VFP\_214)

**Response:** Please see the response to Comment 1-136 in Chapter 22 of the FEIS, "Response to Public Comments."

## **UNAVOIDABLE ADVERSE IMPACTS**

**Comment 222:** The point behind an EIS is to determine the impacts of a project on surrounding communities, mitigate those impacts when possible, but then abandon the project or aspects of it, if it is determined that significant adverse impacts remain despite mitigation. It is irresponsible for the state to go ahead and knowingly, willfully destroy a neighborhood to advance its own goals. Yet that is exactly what New York State is doing – sacrificing Floral Park in order to shove a project where it doesn't belong. In ESD's own words in the FEIS: "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...The Proposed Project would result in significant adverse impacts on the local street network, the highway network, and bus service, as well as potential impacts to parking." (Ronan\_126)

**Response:** The purpose of an EIS is not to abandon all or portions of a project if it is determined that significant adverse impacts cannot be fully mitigated. 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 in its findings 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. ESD will balance the need for economic development and job creation 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 LIRR Elmont Station was added to provide improved service to the surrounding community and to mitigate transportation impacts identified in the EIS.

## **C. COMMENTS ALREADY RECEIVED ON THE DEIS**

### **PROJECT DESCRIPTION**

#### *PUBLIC REVIEW PROCESS*

**Comment 223:** Very early on we met with ESD staff and project partners and discussed various issues, such as parking, traffic, use of LIRR, security, quality of life issues and other elements. As this project progressed, new elements were introduced, such as the use of the south parking lot for the shopping experience, forcing the majority of the parking to be behind the main race track and placing it adjacent to our grammar school and many of our homes, leaving our residents to deal with all kinds of issues to security, tailgating, light and noise pollution, et cetera. The changes to the project have exacerbated the already unsolvable traffic issues that the project will cause. These traffic issues are said to be unsolvable per the DEIS. (Longobardi\_TS5\_047)

In addition to our concerns about the impacts of the proposed stadium project on traffic, infrastructure, and the environment and the lack of concrete economic and other benefits for our community, we do not feel that the developers or Empire State Development Corporation have adequately consulted with community members. In 2008, our communities began the process of planning new land uses for the area—as prescribed by law. We developed an Elmont Community Vision Plan that took the needs of the neighborhood into consideration and was grounded in an extensive history of idea sharing and consensus building. ESD should carefully incorporate community input through the mechanisms set forth in the Urban Development Corporation Act for a project of this magnitude and scale.

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**Memorandum of Responses to Public Comments on the FEIS**

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Yet, to date, this has not happened. Instead, in pushing the Arena Partners' mixed-use stadium project, ESD has largely overlooked the key stakeholders in Elmont and surrounding neighborhoods, and disregarded our vision for community-centered, community-led development set forth in the Vision Plan. They have disregarded the UDF act, and the binding 2008 Vision Plan. (BPCC\_114)

**Response:** Please see the response to Comment 1-55 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 224:** Many of us have spoken. At each meeting we left with more questions than were answered. (Trentacoste\_TS5\_071)

**Response:** Please see the response to Comment 1-140 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 225:** I voice our objection to the lack of transparency that is the hallmark of this bad idea in Elmont. (Phillips\_TS5\_081)

Despite the adjustments reflected in the FEIS, this project continues to be short-sighted and poorly thought out, and it will shatter our communities that we have worked tremendously hard to build and maintain. If ESD truly wants to work with local communities as previously indicated, this project will be returned to the drawing board for something that will benefit, not harm, all surrounding communities. (Mesnick\_115)

This plan has not been transparent and is full of claims that are at best leaps of faith and at worst lies. An elected politician who approves of this type of fleecing is not working in the best interest of their constituents. (Tek\_167)

During this entire process the community has been ignored and lied to. The surrounding communities are not benefiting from this development. (Gormley\_188)

I do not see any input from the community. (Ahrens\_199)

All of these development plans should be voted on by the people, and not rolled out by un-elected, non-resident outsiders. (Costello\_206)

You have shown a total disregard for the people of this community, especially those of us living closest to the project. (Amato\_128)

I am amazed that I do not see any input from the community. (Ahrens\_156)

**Response:** Please see the response to Comments 1-2 and 1-3 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 226:** For the ESD to accept and approve this project, it will be rejecting all consideration of local needs and desires. That's in direct conflict with ESD's mandate under the statute. (VFP\_TS5\_088)

As lead agency the ESD has obligations in relation to the State Environmental Quality Review Act, but it also has obligations under the Urban Development Corporation Act. Under Section 6266, ESD is obligated to, “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.” In the comments that were submitted on the Draft Environmental Impact Statement there was one virtually uniform concern that was expressed. The project is too big. (VFP\_TS5\_088)

New York State’s Urban Development Corporation Act requires that ESD “give primary consideration to local needs and desires and foster local initiative and participation in connection with the planning and development of its projects.” Please honor the UDC Act, go back to the drawing board. (Ronan\_126)

As is required under the UDC Act, when considering a proposal such as this Project, ESD is required to “give primary consideration to local needs and desires.” At the earliest stages of this Project, the Village attempted in good faith to work with ESD and the Project proponents, NYAP, to achieve this goal. However, the good faith extended by the Village of Floral Park has not been reciprocated by ESD or NYAP. (VFP\_169)

**Response:** Please see the response to Comment 1-2 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 227:** In 2012, ESD issued a Request for Proposal for the development of underutilized land at Belmont Park. In January 2013, the Cosmos of the North American Soccer League submitted a proposal that included a privately-financed \$400 million, 25,000-seat stadium, with retail, restaurants, and a hotel. The bid was one of four submitted for the land. Four years later, in December 2016, ESD withdrew the RFP, rejecting all four plans. In December 2017, ESD hastily put together a press conference at Belmont to announce that “the Islanders were returning to Long Island.” One of the sites most frequently mentioned as a possible destination for one or both of the soccer teams is at Willets Point on the site of the Wilpon-owned (Queens Ballpark Company) Citi Field. It would certainly be fortuitous for the Wilpons if the rejection of both soccer field proposals at Belmont resulted in them having interests in both the Belmont project and a new soccer stadium at Citi Field. (BPCC\_165)

**Response:** Please see the response to Comment 1-29 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 228:** There still is not a board that has been set up during this development project where representatives from all surrounding communities sit on and have a voice

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in this project. We have to remember that this is a residential area and not an industrial park as other projects of this size have been built on. (Motlenski\_109)

**Response:** Please see the response to Comment 1-7 in Chapter 22 of the FEIS.

**Comment 229:** This project is a gateway to Nassau County and should be planned properly. (Reisig\_TS5\_051)

There really has not been enough planning and with the size of this project we are concerned about, not just the short-term impact but the long-term impact of Floral Park for the decades that are to come. But we don't really believe the total size of the project is the right project. So if it can only be approved as yes or no, we believe it should be no because it is just too large for the property. (McGuire\_TS5\_052)

**Response:** Please see the response to Comment 1-131 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 230:** In regards to SEQRA, it was revealed in a FOIA response that a Belmont Park Master Plan was developed years ago in secret. This should have been disclosed to the public when it was created. (Ronan\_126)

The fact that ESD was privy to NYRA's own 'master plan' prior to the release of the RFP by NY ESD raises troubling issues. (McEnery\_180)

Regarding FEIS Chapter 22 response to Comment 1-26, while ESD may assert that it did not communicate with any NYAP representatives before the publication of the RFP, then why would NYAP representatives make such public statements that suggested otherwise? As soon as the ownership of the New York Islanders express interest in the Belmont property, ESD issued a second RFP which was tailor-made for an Islanders Arena. It is time for ESD to come clean with the obvious pre-RFP contacts that took place. This also appears to be splitting hairs, as it appears that the ESD discussed a "master plan" with representatives of NYRA which apparently included an arena very similar to what has been presented by NYAP representatives, as was made evident as a result of a response to a Village of Floral Park FOIL request and was not part of the SEQRA public record. (McEnery\_180)

The March 19th submission included a document received from the Franchise Oversight Board ("FOB") after the March 1st deadline in response to a Freedom of Information Law request. That document included a Master Plan that was attached to a November 2016 email submitted by Christopher Kay, President of NYRA, to Robert Williams, head of the FOB, as well as several other State officials. That 2016 Master Plan, which was kept secret from the public, laid out a detailed proposal for development at Belmont Park that is virtually identical to the NYAP proposal, including the development of a 19,000 seat arena specifically earmarked for the Islanders and extensive mall/retail space, in addition to a series

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of improvements to and expansion of the existing Belmont Racetrack facilities. The Master Plan proved that ESD's SEQRA process was impermissibly segmented. (VFP\_214)

**Response:** Please see the response to Comments 1-26 and 1-27 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 231:** We submitted supplemental comments on March 19th, 2019 that related to a FOIL response that referred back to a 2016 master plan that was being developed in secret. Floral Park for years has begged governmental officials with authority to develop a master plan for Belmont Park. But the whole purpose of that was to do it in daylight, not in secret. (VFP\_TS5\_088)

Once the DEIS was released the project significantly changed in scope the more direct impacts on Floral Park, for example, the now use of the north field, which I'd like to point out in the RFP, it specifically said the north field would not be used. The outreach and partnership of ESD has ceased. In the spring of this year, we found out through our FOIL request that there was a master plan submitted by NYRA to New York State in 2016, which was prior to the RFP being released and that resembles exactly the approved plan that we see today. This has led myself and our residents to believe this project has been a fait accompli since before the process even started. (Fitzgerald\_TS5\_072)

We wanted a study of arena impacts on communities. A master plan for Belmont Park, which all along existed, through our FOIL requests, we found out. A scaled-down project? Nobody's willing to do that. (Alfonsi\_TS5\_086)

**Response:** Please see the response to Comments 1-27, 1-33, and 1-131 in Chapter 22 of the FEIS, "Response to Public Comments."

### ***PURPOSE AND NEED***

**Comment 232:** Nassau Coliseum is only eight miles away from Belmont. It's been there for 40 years. It recently underwent a \$150 million renovation. It can surely be restored to meet the NHL standards. The Islanders belong in Nassau Coliseum not in Western Nassau where most of the fans are coming from the east. (Mesnick\_TS5\_085, Mesnick\_115)

We do not need an arena 5 miles from Nassau Coliseum. Every aspect of this project is a waste of taxpayer money! (Walsh\_022)

The Islanders team already has a viable option for its franchise in Nassau County. Their current facility could be upgraded to meet their needs. (BPCC\_114)

There is a perfectly fine arena for the Islanders to play in. In fact, they used to play there and its only about 10 miles east on Hempstead Turnpike. Quite honestly who cares if the Islanders want to play at Belmont Park. They already abandoned

Nassau and now we're supposed to bend over backwards to accommodate them? They can go back to their old building which Nassau residents were told was being refurbished to attract the team back. Now they want another new building? Really it would be the third building built for them in Nassau. (Scaramuccia\_124)

Neither the Islanders fans nor the local residents want this project...Uniondale is perfect! (Saunders\_134)

There is no need to construct an arena at Belmont in order to provide a home for the New York Islanders. The Barclays Center remains available to the Islanders, as does the refurbished Nassau Coliseum. (Forman\_220)

What this proposal does is destroy the viability of the Nassau Coliseum and saddle future residents of New York with added spending which must be paid back. (Forman\_220)

Instead put several million dollars back into the Nassau Coliseum and renovate it the way it should have been done to accommodate the NY Islanders, the lifeblood of the facility. (Barry\_195, Ronan\_126)

There is no need for a concert/sports arena in this area when there is an existing building a few miles away. The public is being sold a bill of goods as to how these two arenas can coexist. If a Disney on Ice or a concert is scheduled at the Belmont Park site there is no reason for an additional date to be booked 6 miles away. (Gorry\_219)

**Response:** Please see the response to Comment 1-36 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 233:** This location in Elmont, Nassau County is not appropriate for the proposed Belmont Park Project. The Project will result in environmental degradation to the surrounding communities and horrific traffic in an area on the Queens and Nassau border which is already heavily impacted by vehicular traffic. (Forman\_220)

The unincorporated hamlet of Elmont is a curious and inappropriate place to construct an arena, dining, retail, and entertainment facilities and a hotel. One would assume that had there been demand for such amenities in Elmont in the past, such facilities would have been built by private businesses. I predict that people will not travel to downtown Elmont from the far reaches of the New York City metropolitan area to patronize the dining, entertainment and retail establishments contemplated by this proposal, nor will they purchase lodging at the 5-star Elmont Motel. I do not foresee people leaving Manhattan, with all it has to offer, for a one hour train ride with a round trip fare of about \$25.00 to partake in all the exciting offerings that the proposed project will bring to beautiful downtown Elmont. (Forman\_220)

**Response:** Please see the response to Comment 1-37 in Chapter 22 of the FEIS, "Response to Public Comments."

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**Comment 234:** As the plans came out and the draft was released, it became apparent that the goal of this project was to benefit the developers. (Smith\_TS5\_079)

I do not see this project, as it stands, being able to provide what's best for those living there. (Smith\_TS5\_079)

I for one, do not see us in a position for benefit from this project. (Mesnick\_TS5\_085)

**Response:** Please see the response to Comment 1-28 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 235:** Reconsider the scope of this project before it becomes a wrecking ball into the residential community full of hard working families. (McClintock\_TS5\_080)

Scale back the scope of this project to a more manageable size so that it can actually be sustained by the already congested network of neighborhood roads and to ensure the future success of the very project itself. (McClintock\_TS5\_080)

I must strongly protest any development of Belmont Park, especially one of the size and scope you are proposing and apparently plan to implement no matter the feelings of the residents of the Village of Floral Park. (Scaramuccia\_124)

Make the project smaller and address the needs of all the neighboring communities to protect and improve their way of life. Please work with local residents to address real concerns and plan ways to work together so all involved can enjoy the positives that could come out a reasonably sized project and the injection of jobs and commerce in the area. (Smith\_213)

**Response:** Please see the response to Comment 1-49 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 236:** I want smart, innovative development of that property. We need it. I have seen the deterioration of the Belmont organization and the racetrack. We would like to see it developed but no component of this submission of this project addresses any of our concerns. (Thompson\_TS5\_089)

**Response:** Please see the response to Comment 1-131 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 237:** Public dollars are being used as corporate welfare to subsidize a private-sector business. The only real beneficiaries of these expenditures are team owners and their players, who earn far more than the average fan. What is the cost of improved sewer, water, electrical, road, traffic signal and other infrastructure improvements? There is also increased fire, police and sanitation services. How much will taxpayers be on the hook to pick up the tab? (Emmel\_100)

We are not footing the bill for this project! No IDA! (Amato\_119)



We need to see real numbers as to what exactly the Islanders are taking out of their pockets for this project and what you expect from this already strapped community. (Amato\_128)

**Response:** Please see the response to Comment 1-112 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 238:** The Belmont Park arena project promises all sorts of service options which are already available all over Nassau County. Do we really need another “retail village” with various stores and boutiques? They also propose to offer new dining options, sports bars and restaurants. Next, there will be conference centers and meeting rooms along with movie theaters and concert facilities. All of these so-called benefits would just compete against existing shopping malls, upscale stores, restaurants, sports bars and end up stealing some of their customers. There are already plenty of hotels and colleges which offer conference centers. The same is true for movie theaters and smaller more intimate concert facilities. Since there are less than 60 Islanders home games, the facility will have to be leased out for another 100 events to turn a profit. Why would any rock band appear there, when they can go to Jones Beach Theater, Westbury Music Fair, Nassau Coliseum, Shea Stadium, Arthur Ash Stadium, Forest Hills Stadium. Madison Square Garden, Barclay Arena or Radio City Music Hall? The same is true for World Wrestling Federation, circuses, college sports or other events requiring space for several thousand participants. (Emmel\_100)

Why are we building a mall on this site? We have empty retail all over Long Island. Vacant stores are everywhere and sadly more and more are going out of business. Why are we building more retail space when we can’t save what we already have? How is a mall beneficial? How is it a solution? (Fattorini\_209)

The Belmont Park Project is an unwise use of approximately 43 acres of state controlled real property. The New York Islanders Hockey Club is a privately owned business. That NHL franchise is not in need of the new arena structure proposed for Belmont Park in Elmont. (Forman\_220)

**Response:** Please see the response to Comments 1-31, 1-61, 1-66, 7-15 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 239:** When the Islanders were in Uniondale, they didn’t border residential homes and elementary schools and high schools...the turnpike is much wider and the Meadowbrook only goes from north and south Long Island, unlike the Belt/Cross Island that runs from Staten Island to Brooklyn, Queens, Long Island up to Westchester. The Islanders did nothing for Uniondale, do you see people clamoring to get into Uniondale? (Amato\_119)

**Response:** Please see the response to Comment 1-36 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 240:** Remember the NY Jets? Their home was Hofstra University, until they built the new sports complex for them, then, they left! It is now used for graduations for high schools and Hofstra. So what happens when the Islanders finish their IDA and leave? (Amato\_128)

The Oak View Group owns the Islanders sales and marketing rights. Do they exercise an “out” clause—just like Brooklyn Sports and Entertainment did at Barclays Center—do the Islanders get stuck into another awkward financial situation as they did in Brooklyn? (BPCC\_165)

**Response:** Please see the response to Comment 1-34 in Chapter 22 of the FEIS, “Response to Public Comments.”

#### *COMMUNITY BENEFITS*

**Comment 241:** Who is benefiting ultimately from this—the State? The developers? It is not those of us who will suffer through the noise, pollution, reduced property values, increased village taxation, and loss of our suburban lifestyle. (Schlechter\_204)

In the Purpose and Need Statement for the EIS, ESD states that one of its objectives is to, “Benefit the neighborhoods and communities adjacent to and surrounding Belmont Park.” ESD’s proposed project will not achieve this objective—it will do more harm to our community than good. I urge ESD to scale back the size of the project, consider an arena only alternative, protect our schools, provide resources to our local Police and Fire Departments, and issue a Supplemental DEIS. (Culotta\_222)

**Response:** Please see the response to Comment 1-44 in Chapter 22 of the FEIS, “Response to Public Comments.”

#### *PROPOSED PROJECT SCALE*

**Comment 242:** The DEIS is released and the project size increased about 400 percent now that the NYAP parking lot should be used. The same lots that ESD and that NYAP assured us would not be used. An outlet mall was revealed with luxury stores not serving local residents. So where’s the give and take? (Alfonsi\_TS5\_086)

I remain concerned about the dramatic expansion of the Belmont project from what was originally proposed. The complex is too big. (Ronan\_TS5\_096)

As part of the taskforce and along with fellow neighbors, we pleaded with ESD and the developers to reduce the scale of this project for real thoughtful fixes to our real and thoughtful concerns about the project. (Smith\_TS5\_079)

We would be happy to work with ESD on a more inclusive process to come up with a better use for this property that would substantially and sustainably benefit the people who live here. The current proposal could be scaled down significantly

and developed in a way that is more in line with local growth and economic development needs. Our goal is not to hinder, but to encourage strategic and sustainable planning for our region. (BPCC\_114)

As a Floral Park resident for over 40 years I am deeply concerned about the parameters of the Belmont Project, how the scope has grown from the original proposals and how it is being rushed and pushed along without clearly considering all of the ramifications to the surrounding communities. (Emmel\_100)

We're going to put them into an arena and into a community that cannot accommodate them. The solution for them going to games and having those moments with their families will be lost because they'll get into Floral Park and they won't be able to get out. The Floral Park community will die around it and it will truly impact not only Floral Park but Elmont, Bellerose, all of the community villages that are around there that are thriving and supporting that area, they will soon die based on this proposal if it's not scaled back. (Lidnskog\_TS5\_097)

**Response:** Please see the response to Comment 1-49 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 243:** Our quaint town will be inundated with increased traffic and pollution while developers receive a handout. (Tek\_167)

**Response:** Please see the response to Comment 1-55 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 244:** What you are proposing will severely affect the quality of life in our Village for the worse. Traffic, noise, lights, increased cost of living for the residents. (Scaramuccia\_124)

You have ignored the need to keep this area which is a suburban location just that. Adding the mall and using up almost all the open space is essentially destroying the communities that we chose to live in. You have eliminated the buffer areas with the school and the surrounding communities. You need to do more given all the issues and problems that have been presented but not addressed. (Schlechter\_204)

The Belmont Development Plan has not fully taken into account the impact it will have on surrounding communities. Our water resources and roadways will be heavily effected and stressed. These stresses will have a domino effect that will impact our local emergency responses and its costs. (Costello\_206)

I have significant concerns with the FEIS for the Belmont Project and the potential for significant disruptions to our quality of life. Put simply, the Belmont Project is too big. ESD admitted in the Draft Environmental Impact Statement ("DEIS") that the traffic impacts alone would be significant, adverse, and permanent, and

that ESD could not adequately mitigate them. The project also would result in significant safety concerns and noise, air, and light pollution. (Culotta\_222)

**Response:** Please see the response to Comment 2-14 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 245:** This complex is too big. (Ronan\_126)

The proposed project is entirely too large for the property and its location in an established neighborhood, serviced by roads that are currently at or near capacity. This will overwhelm the surrounding neighborhoods, forever changing them. (Martinez\_140)

This project is just way too big for the area and existing roadways. A project of this size would require constant truck traffic just to feed a world class race track that is expanding its race card and night racing, a 19,000-seat arena, a 205-room hotel, and 400,000-square feet of retail. (Mchale\_116)

I am writing to you as a concerned Bellerose Terrace citizen to continue to protest the overdevelopment of the land at Belmont Park. The proposed project is entirely too large for the property and its location in an established neighborhood, serviced by roads that are currently at or near capacity. This will overwhelm the surrounding neighborhoods, forever changing them. (Cohen\_145)

This is poor planning of a twenty-pound project being shoved into a five-pound property, it is just too much for this small area, and too many laws are being compromised to push this project through. It is crystal clear that regardless what we say this project is being bulldozed through and rules and regulations do not apply. (Moriarty\_192, Ahrens\_208)

**Response:** Please see the response to Comment 1-52 in Chapter 22 of the FEIS, “Response to Public Comments.”

#### *SITE MANAGEMENT, SAFETY, AND SECURITY*

**Comment 246:** How can we as a community be in partnership with ESD to protect our young children and families from the influences of the crowds attending these events? And it’s not just the Islander games, it’s other things will be there as well. So as you know, our police force is funded through Village tax dollars. With such an influx of people coming into western Nassau right through our little Village, how can we effectively police the area and handle emergencies during highly attended events as most of these events will be scheduled during already high peak traffic times. The Village residents are not in the position to fund additional police and emergency. Our taxes already top the charts. And can ESD help us understand how this would be worked into the proposed plan? (Paterno\_TS5\_068)

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**Response:** Please see the response to Comment 1-87 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 247:** Among the many concerns of this project that Floral Park has consistently raised, without often being offered workable solutions, I am here to discuss the use of the two parking lots; one of which sits directly opposite our grammar school. Please tell us what protective barriers are being proposed to protect our children. (McClintock\_TS5\_080)

The school is so close to what promises to be a beehive of activity. And I believe it's going to be 365 days. I like the Islanders too but I have to tell you that, you know, you might think it's 3:15. They get out of school. That's the end of that. That's not the case. We have all our soccer and our sports, are housed in those back fields, which abut that property. (Paterno\_TS5\_068)

I fear my daughters being leered at, hassled or worse by rowdy customers on the way to the Islanders game. (Reisig\_194)

How will tailgating be policed? (McNally\_190, Paterno\_TS5\_068)

How will tailgating be monitored and deterred? Will alcohol be banned in the parking lots? (Chin\_218)

**Response:** Please see the response to Comment 1-88 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 248:** There needs to be ironclad guarantees that all of these new facilities will be designated as emergency evacuation centers that can handle thousands of evacuated residents, especially from the low sea level areas of the south shore of Long Island. We do not need the new arena to become our own superdome like took place after hurricanes in New Orleans. (McEnery\_180)

**Response:** Please see the response to Comment 1-89 in Chapter 22 of the FEIS.

### *PROPOSED ENTRANCES, EXITS, PARKING, AND CIRCULATION*

**Comment 249:** Someone will have to build a maintenance facility for the electric buses. Where will they be located? (McEnery\_180)

Will there be enough electric shuttle bus capacity during peak periods to simultaneously serve both LIRR riders traveling to the Islanders Arena, hotel, conference center, movie theater and retail complex, while at the same time providing shuttle service within Belmont Park parking lots to the arena? (McEnery\_180)

**Response:** Please see the response to Comment 1-101 in Chapter 22 of the FEIS, “Response to Public Comments.”

*PARKING LOTS/OTHER DIRECTLY AFFECTED AREAS*

**Comment 250:** Using the north field immediately adjacent to the Floral Park-Bellerose School is another poor choice. (Emmel\_100)

The revised plan calls for parking in the North and East lots, adjacent to Floral Park's schools, soccer fields, playground, and homes. The earlier proposal did not utilize these lots for parking. In addition to the unacceptable increase in traffic, this project will also strain infrastructure, eliminate open space, and increase pollution, noise and crime. (Ronan\_126)

The project will generate noise and people who come in and out of my Floral Park neighborhood who I no longer know. (Guilfoyle\_TS5\_063)

I am worried about the safety of my children, increase in crime, traffic throughout town, lack of infrastructure. (Reisig\_194)

**Response:** Please see the response to Comment 1-103 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 251:** In addition to the Floral Park-Bellerose School, my family's home is one of many in close proximity to this lot, which is planned to host approximately 3,000 parking spots. The exhaust, lights, and noise from cars as well as the lights illuminating the lot will be intolerable. Many hockey games end around 10pm and concerts even later. At the public hearings in January one local resident spoke of the tradition of Islanders fans sitting in their cars and honking their horns following a victory at home. According to mydriverlicenses.org and other websites, car horns must be heard a minimum of 200 feet away. (Mesnick\_115)

Please tell us what is being done to preserve the quality of life that we worked very hard to preserve? What about noise pollution from these lots? Air pollution? Light pollution? Waste pollution: Who will clean these lots and what resource and recourse we will have if they don't. (McClintock\_TS5\_080)

Issues such as traffic noise, car horns, headlights shining in home windows at all hours of the night and pollution, among other topics, warrant investigation. (Muscarella\_226)

**Response:** Please see the responses to Comments 2-14, 2-19, 2-20, and 13-2 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 252:** I also urge ESD to consider an alternative that utilizes Site B for parking only, and to eliminate the East and North Lots in Belmont Park as parking areas. The East and North Lots are too close to our homes and our schools, particularly Floral Park-Bellerose School and Floral Park Memorial High School. As a recently elected Trustee on the Floral Park-Bellerose Board of Education, I have serious concerns about the safety of our students, parents, teachers, and school personnel,

particularly during pre- and post-event activities which may include tailgating. The Project would place a huge strain on the small Police and Fire Departments in Floral Park and the surrounding communities. These departments do not have the resources to address the safety and security issues associated with up to 40,000 people traveling through the community each day. (Culotta\_222)

**Response:** Please see the responses to Comments 1-102 and 1-103 in Chapter 22 of the FEIS, “Response to Public Comments.”

*PILOT/DEVELOPMENT AND BUSINESS TAXES/PAYMENTS/COSTS*

**Comment 253:** Because the Islanders agreed to move their home to Belmont, New York State ceded the land to be developed in the retail village to Malkin for almost nothing. For the next 49 years, Malkin and his partner will pay nothing to lease the land at Belmont. New York State also granted a 15-year tax abatement for the Retail Village. The partners will make a modest investment in the proposed LIRR station and electrical and sewer improvements at the site. But that’s it. (Emmel\_100)

The Islanders are “tenants” in this project, yet they pay no rent and yet the taxpayers should foot the bill for the increased services that this project will require? Money going to NY State is not going to our communities. In Elmont, the only way to bring in money is through school taxes. We don’t get sales tax revenue. We cannot afford to foot the bill for increased taxes for wear and tear on roads, water usage, sewer usage, increased fire service, etc. Why should the taxpayers here and all over NY State pay for this project? Tax deferrals, no rent, interest free loans, basically just giving it away in exchange for more traffic, more pollution, minimum wage jobs, added stress on our infrastructure and services. This is not a good deal for anyone except the developer and the Governor who is lining his pockets with campaign donations and pumping up his supersized ego. (BPCC\_183)

**Response:** Please see the response to Comment 1-111 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 254:** Taxes are a big concern. So the pilots have been in discussion. We haven’t finalized anything about that. (Kokura\_TS5\_076)

This impact statement does not have the percentage of income that would be derived and used to lower the property taxes here in Elmont. (Stowe\_TS5\_090)

**Response:** Please see the responses to Comments 1-118 and 3-1 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 255:** The changes in the project will create major security issues for our community with an estimated annual additional cost of \$2.3 million to simply maintain what we already have. Who will pay for that? And do you think it is fair to place that

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burden on the taxpayers that receive absolutely no benefit from this project. There is no benefit to the incorporated village of Floral Park whatsoever. (Longobardi\_TS5\_047)

Funding for additional police activity, road repairs. We get nothing (Alfonsi\_TS5\_086)

**Response:** Please see the responses to Comments 3-1 and 15-2 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 256:** The State is giving this land away for cheap. Why devalue the housing market by selling 43 acres of property for only \$40 million? (Reisig\_TS5\_051, Reisig\_194)

**Response:** Please see the response to Comment 1-111 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 257:** It is impossible to judge the amount of new economic activities that these so-called public benefits will generate. Between selling the stadium name, season sky boxes and reserve seating, cable, television and radio revenues, concession refreshment and souvenir sales along with rental income for other sports, rock concerts and commercial events, it is hard to believe that the Islanders Hockey Team owner and Belmont Park developers can’t finance the proposed new stadium on their own. Professional sports are not an essential service and should not qualify for government subsidy. Scarce taxpayer funds would be better spent elsewhere. If this is going to be such a great financial deal, why don’t team owners float their own bonds or issue stock to finance the Belmont Park stadium rather than turn to taxpayers and government for support? Go obtain loans from banks, like medium and small businesses. (Emmel\_100)

**Response:** Please see the responses to Comments 1-120 and 1-121 in Chapter 22 of the FEIS, “Response to Public Comments.”

### *ANALYSIS FRAMEWORK*

**Comment 258:** The Belmont Park Redevelopment Project is being improperly regarded as separate from other changes planned for Belmont by the NY Racing Association. The impacts of both projects must be considered together, meaning the entire impact process should have been started over. (Ronan\_126)

**Response:** Please see the response to Comment 1-136 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 259:** The 0.5 mile radius studied in the EIS is another slap in the face to all the surrounding communities and does not show the true impact on everyone. (Motlenski\_109)



**Response:** Please see the response to Comment 11-49 in Chapter 22 of the FEIS, “Response to Public Comments.”

## **LAND USE, ZONING, AND COMMUNITY CHARACTER**

### *ZONING*

**Comment 260:** The FEIS continues to claim consistency with the Nassau County Master Plan, when an objective reading of the plan shows this is not true. In particular, the project’s significant retail mall development is completely contrary to the Nassau County Master Plan’s stated objection to such development and its traffic congestion consequences, and the plan’s clearly stated goal to protect local “downtown” retail businesses. (VFP\_214)

**Response:** Please see the response to Comment 2-7 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 261:** The process has been fraught with improprieties. The plan violates Hempstead Town zoning restrictions, something that Empire State apparently got around by quietly overriding those ordinances. The State is only allowed to override local zoning rules under very limited circumstances and we are still waiting to hear ESD’s justification for flouting our local rules. The Belmont Park Redevelopment Project is being improperly regarded as separate from other changes planned for Belmont by the New York Racing Association. Our lawyers say that the impacts of both projects must be considered together, meaning the entire impact process should be started over. (Ronan\_TS5\_096)

This plan violates Hempstead Town zoning restrictions, something Empire State apparently got around by quietly “overriding” those ordinances. The state is only allowed to override local zoning rules under very limited circumstances. An override is not justified for this project. (Ronan\_126)

**Response:** Please see the response to Comment 2-13 in Chapter 22 of the FEIS, “Response to Public Comments.”

### *COMMUNITY CHARACTER*

**Comment 262:** My house borders the back of Belmont Park along the practice track, as does my children’s schools. How will this impact our quality of life? Because there are people who live within the confines of this project. The very least we deserve is a comprehensive statement about traffic, environmental impact, waste management, energy usage, and noise. (Cardella\_175)

**Response:** Please see the response to Comment 2-14 in Chapter 22 of the FEIS, “Response to Public Comments.”

## **COMMUNITY FACILITIES AND UTILITIES**

**Comment 263:** Drain of the additional plan on green land, energy, police/fire personal and road infrastructure even with the addition of a full time LIRR station is considerable. (Schlechter\_204)

**Response:** Please see the response to Comment 3-1 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 264:** Floral Park may also become a staging destination for pre-game activities such as dining and drinking. Many fans will enjoy the amenities offered by our Tulip Avenue Business District due to the proximity of the LIRR Train Station e.g. (River Avenue at Yankee Stadium), but this too can have negative consequences in the police handling large crowds, rowdy and drunk fans and overall increase in vehicular traffic. This increased activity demands an increased police presence. Sports franchises e.g. Yankees, Mets, Islanders, Rangers etc. have contributed to offset the costs in either “Paid overtime details” or “off-duty employment details. There are pros and cons to each approach and would have to be fully explored to determine which is more suitable. Any increase in police personnel would also require additional equipment e.g. radios, weapons, vehicles, etc. (McAllister\_159)

**Response:** Please see the response to Comment 3-7 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 265:** The proposed development must enhance our residents’ quality of life. We are not supportive of any development project that would detract from available services or burden the infrastructure our community currently relies on. (BPCC\_114)

**Response:** Comment noted.

**Comment 266:** Regarding the stadium, where are the serious studies about water consumption, waste, and power? (Emmel\_100)

Floral Park does not have the infrastructure, as well as Elmont, South Floral Park or Hempstead. (Reisig\_TS5\_051)

**Response:** Please see the responses to Comments 3-20, 3-22, and 3-27 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 267:** The proposed project would significantly increase the demands on the water and sewage systems in the Elmont area. Although the draft EIS suggests that there will be a redirection of sewage from the site, there is no clear indication of where the additional sources of potable water will come from. The only available

sources that have the capacity to supply water to the proposed development would most likely come from the Water Authority of Western Nassau County. (BPCC\_114)

I'm here to speak about our water usage. And the area is currently supplied with water from aquifers. Three key aquifers supply much of the water for Long Island. The Water Authority at Western Nassau County supplies over 2,800 customers and serves over 120,000 individuals. A water system is operating according to the scale for the number of residents and visitors that are currently located in the region. The proposed project would significantly increase the demands on the water and the sewage systems in the Elmont area and surrounding areas. Although the Draft EIS suggests that there will be a redirection of sewage from this site, there is no clear indication of where the additional sources of potable water will come from. The only available sources that have the capacity to supply water to the proposed development would most likely come from the Water Authority of Western Nassau County. There have not been any clear discussions about how the additional infrastructure upgrades necessary to supply this sustained surge in water use will be financed. Consider, for example, in 2008, Belmont Stakes that left many residents without water. It will be unacceptable for the residents of the area to have to bear the burdens of increased water prices, water scarcity and stress on the sewage system because of the project of this magnitude. (McDonald\_TS5\_094)

It is uncertain whether ESD and Arena Partners have identified sources of additional potable water sufficient to support both the health and welfare of our community, I might add, our very diverse primarily minority community, and the proposed arena. (Phillips\_TS5\_081)

**Response:** Please see the responses to Comments 3-22 and 9-17 in Chapter 22 of the FEIS, "Response to Public Comments."

#### *ENERGY SUPPLY*

**Comment 268:** Geothermal energy and energy efficiency is the perfect heating and cooling mechanism, especially if there's an ice rink involved. We would like the chance to work together on renewable technology and development of all ESD plans moving forward. (Fraczek\_TS5\_061)

There was big discussion about solar and natural gas as far as fueling the stadium, the arena and the other local things. So these still need to be addressed. (Kokura\_TS5\_076)

My big question is why isn't it solar or self-sustaining. Given the recent Manhattan blackouts it is backwards to even have the state build something that will use so much power. This facility could be a way for the state to show how alternative energy can be used and give something back the surrounding

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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community. We know that we are not going to profit by this facility and it is going to hurt our village and our community financially so at least putting energy back into the grid would be positive. (Schlechter\_204)

**Response:** Please see the response to Comment 14-5 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 269:** The Williams Pipeline has reapplied for the northeast supply enhancement project. It was once slated to power the Belmont arena and we want to just put on record that 260 New York State organizations are in opposition, there are 25,000 petitions and 26,000 legal comments to the New York DEC. Over 60 New York State and federal elected officials. New York City Council resolution opposing the pipeline. And the DEC has denied this pipeline twice. We have no way to know if you’re including the Williams Pipeline in your plans if the reapplication of the pipeline is approved. (Fraczek\_TS5\_061)

The highly controversial Williams Pipeline (which would run a methane gas pipeline under New York Harbor) is the most likely source of energy for this development. The public comment period to the DEC for the Williams Pipeline (defeated several times, but ever-returning) is Friday, July 12th. (Lyons\_023, Lyons\_146, Lyons\_147)

**Response:** Please see the response to Comment 3-34 in Chapter 22 of the FEIS, “Response to Public Comments.”

### **OPEN SPACE**

**Comment 270:** I don’t understand why we can’t leave Belmont Park as a park. Belmont is a place where families picnic, not everybody gambles. If you intrude upon the park, you will drive people away. Long Island is about green space, not tall ugly building and apartment buildings, not living on top of one another. If I wanted to live in the city, I would have moved to the city. (Amato\_119)

Think of the world we need to give to our children and grandchildren—mall or open green space? (Schlechter\_204)

**Response:** Please see the response to Comment 4-3 in Chapter 22 of the FEIS, “Response to Public Comments.”

### **VISUAL RESOURCES**

**Comment 271:** What is your project going to do to the beautiful skyline when you look out over the track from inside the building? (Amato\_119)

**Response:** Please see the response to Comment 6-1 in Chapter 22 of the FEIS, “Response to Public Comments.”

## SOCIOECONOMIC CONDITIONS

**Comment 272:** We remain concerned that this project will result in substantially reduced funding resources for Union Free School Districts, hurt local businesses, and have negligible—if not negative—effects on local tax revenue. (BPCC\_114)

**Response:** Please see the response to Comment 1-117 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 273:** Two arenas in such close proximity is not viable; there are not enough events to be divided among them, in addition to the other local venues (Barclays Center, MSG, Jones Beach, Citi Field, Yankee Stadium). In June 2019 the Coliseum hosted six events for the entire month, and four in July. August through October have no more than six events scheduled per month. Something will give, and Nassau County and its residents will suffer because of it. (Mesnick\_115)

**Response:** Please see the response to Comment 7-20 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 274:** This will impact the property value on our homes. (McCarren\_217)

It have already negatively impacted the housing market here. (Schlechter\_204)

**Response:** Please see the response to Comment 7-26 in Chapter 22 of the FEIS, “Response to Public Comments.”

## ECONOMIC BENEFITS

**Comment 275:** Our council believe that the key to realizing this awesome opportunity actually begins with a plan that commits to building the project with a local workforce that will yield permanent jobs here on Long Island, along with a substantial community benefits program that will bring expanded local tax base. (Ericson\_TS5\_070)

I ask for assurances that Long Islanders will be the ones filling the jobs generated by these millions of dollars in construction. A project labor agreement will assure this happens. (Gillen\_TS5\_082)

**Response:** Please see the response to Comment 7-7 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 276:** The project will bring much needed jobs to the area and, yes, they won’t all be six figure salaries, far from it I presume, but our young adults and senior citizens need this project to bring jobs that are closer to home. (Suaby\_TS5\_075)

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Jobs, both permanent and temporary, especially highly skilled construction positions. We all know they aren't permanent but the stores being built will have permanent jobs especially for the youth and elderly of the community. (Kerr\_016)

I am looking forward to being able to get a part time job right here in Lemont when I retire. For that reason and others, I support the Belmont Redevelopment Project. (Witter\_142)

Stand up for the seniors who do not want to travel far for work or drive our kids to a park far away because we have no quality options in Elmont. (Witter\_142)

This is the first and only project what would create jobs in an area where people are commuting over an hour daily just to get to work. (Arzooman\_007)

Jobs are being created and money is being spent to revitalize an entire area. (Grappone\_014)

I graduated from Elmont High School and in search of part time employment while I am attending college and I feel that a fresh new development can add to our community by offering job opportunities for the youths such as myself. It would be so much easier to work closer to home than to commute long distances just for employment and it would be great to graduate from college and be able to come back to my community and give back. There are so many college graduates who would love to work in Elmont including myself. (Gaul\_131)

This project will create and provide employment opportunities for existing NYS residents and within the Elmont Community, as opposed to bringing in new residents from out of state the way that Amazon's HQ would have done; Teenage kids and local residents will have many opportunities to work close to home with safe transportation to arrive there quickly. The construction industry needs to continue to grow in NY for several reasons, but without boring everyone any further, the entire economy thrives on our construction industry. The amount of construction jobs provided by this project does not truly reflect the amount of people that rely on construction for their livelihood. (Colombo\_026)

**Response:** Comment noted.

**Comment 277:** The project at Belmont is an important development of communities that desperately need to be bold and see investment made in them. Jobs will be created, economic activity will grow, and the local population will primarily see the benefits of this development. (Sacco\_038)

I feel that a fresh new development can add to our community by allowing an influx of job opportunities for our youth and residents, bring value to our community and increase our economic growth. (Warburton\_132)

This project will provide an economic boost that will help the entire Hempstead Turnpike corridor, and encourage local small businesses. (Schneider\_042)

The local restaurants and bars, composing most local business, would probably experience a huge increase in patronage. This project will do a lot to help the people in the area for years to come. (Arzooman\_007)

The arena will bring big revenue to our area, keep the Islanders, and stimulate economic development. (Teta\_044)

The project would make Elmont a place for destination purposes. It would create jobs for construction workers, and permanent retail jobs. Also, it would give more business to stores in the area down Hempstead Turnpike. (Tartaglione\_045)

**Response:** Comment noted.

**Comment 278:** Being a life-long Elmont resident, it would definitely be a boon to the economy. In addition to that, the jobs that are going to be provided, temporary as well as permanent jobs. And, again, we'd like to see that in writing that there's going to be a percentage offered to first the young folks that are eligible for jobs, as well as job training. These are all things that have been talked about during the CAC meetings but we'd like to see that in writing. (Kokura\_TS5\_076)

**Response:** Please see the response to Comment 7-11 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 279:** We do not see the potential for sustainable and meaningful economic benefits for our community stemming from the proposed mixed-use stadium project to justify the burdens it would place on us. Throughout the process, Empire State Development Corporation has asserted that the project will create jobs. But lower-wage service jobs in retail, food service and stadium maintenance are not the type of job growth that the professional and middle-class residents of Elmont need. Instead, we see the developers and owners of the project reaping benefits outside our community while we are stuck with the burdens. The assertion that this project will generate economic activity for surrounding communities is simply not supported by economists' findings or empirical evidence from other communities that have hosted new stadiums or arenas. Studies of the economics of sports facilities (with data spanning decades) overwhelmingly show that such facilities spur scant economic benefits for the governments that subsidize them and the communities that house them. These projects often have sustained negative economic effects. One comprehensive study of the growth effects of sports franchises concludes that "sports-led development is unlikely to succeed in making a community richer" and that if the government is truly "looking for a policy to foster economic growth, far better candidate policies exist than those subsidizing a professional sports franchise." (BPCC\_114)

The only jobs worth any money that they will create will be for the developers and the construction crews, who I'm sure will not be from Elmont! We don't need minimum wage jobs! (Amato\_128)

Construction jobs will leave and we will be left with minimum wage jobs and an enormous amount of problems such as traffic, crime, wear and tear on our streets and more without any financial benefit for the community. (Gormley\_188)

The jobs that will be offered are part-time and low paying - how does that benefit the community? (McGuire\_191)

We don't need minimum wage jobs here. (Amato\_172)

Retail is mostly made up of temporary dead-end part time work force jobs. It is apparent that the vast majority of long term jobs are likely to be counted closer to the \$15 per hour range than anywhere near the \$150,000 neighborhood. (McEnery\_180)

**Response:** Please see the responses to Comments 7-5 and 7-6 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 280:** Jobs will be created, but the people in the community will not have the advantage in getting those job opportunities. (Singh\_Ramkissooon\_120)

**Response:** Please see the response to Comment 7-11 in Chapter 22 of the FEIS, "Response to Public Comments."

#### *POTENTIAL COMPETITIVE EFFECTS—RETAIL*

**Comment 281:** I wasn't a fan of the scope of the plan with the retail stores. I'm a retail professional. I don't know any retailers in the world that want to build and open stores right now except if you have luxury stores opening next to a casino. (Weissman\_TS5\_062)

One thing I wanted to also mention is the additional retail space that's been added to the project. I can't understand how this is a viable use of space given the slow death of brick and mortar. In fact, I just came back from out east and so many of the storefronts are shuttered in what was once considered a bustling retail area, you see nothing but vacancies, for rent signs in all the windows. (Paterno\_TS5\_068)

Retail is dying. Someone earlier mentioned the Fortunoff shopping center. If you walk just a few miles from Belmont where the Cross Island meets the Long Island Expressway, there's a massive shopping center with mostly vacant space where there was a Modell's, a Macys, a Toys R Us and a large movie theater. A mega mall, outlet mall, call it whatever you want, is a yesterday idea. Retail is dying. (Mesnick\_TS5\_085)

Who's going to go to this high end mall? Brick and mortar stores are outdated and are being closed. (Thompson\_TS5\_089)



Retail real estate is empty all across Long Island, yet you intend to build more. (Talty\_153)

I see no value to shopping outlets/ malls when there are several close by that are struggling with vacancies. (Prymaczek\_021)

Malls and luxury outlets are struggling. One word. AMAZON. (Walsh\_022)

Where is the consumer research and demographic study that states Elmont needs a mall? There are three major malls (Green Acres, Roosevelt Field, Americana) located less than 10 miles away. The new Hudson Yards on the west side of Manhattan is just 20 minutes away from Jamaica on the LIRR. In an age when anything can be ordered online and delivered to your front door the next day, are malls passe? As of 2017, the New York Times reported there were just 1,100 malls still in operation in America. Credit Suisse estimated that 25 percent of those were at risk of closing in the next five years. (Emmel\_100)

These stores are not needed in an area already over-saturated with retail. (Ronan\_126)

It is common knowledge that retail is dying. A few miles from Belmont, where the Cross Island Parkway (CIP) intersects the Long Island Expressway there is a massive shopping center that sits mostly vacant following the closure of Modells, Macy's, Toys R Us and the movie theater. Per Newsday, 2Q 2018 saw the highest level of vacant retail in 18 years, and earlier this year CNBC reported retail sales have dropped the most since September 2009 (<https://cnb.cx/2X2UDTp>). Additionally, anyone following the stock market knows the current bull marking is widely expected to be due for a reprieve. A mega mall, outlet mall, etc., even reduced in scope, is a "yesterday" idea that has a morbid future and is destined to fail. (Mesnick\_115)

The economic viability of brick and mortar retail has long been declining in this country and Elmont is no exception. We are sincerely concerned that there is not sufficient demand to sustain the retail or arena aspects of this project as there are numerous competing facilities nearby that are more accessible by public transit and car. (BPCC\_114)

Retail? Really? Do you not read the paper or listen to the news, or go to a store? Retail is out! We have enough, too many, stores that the town allowed to become churches (tax evasion at its best, and they aren't even from this area and there's no parking for these churches. (Amato\_119)

Have you driven out to Fortunoff's mall? It's empty. My girlfriends were out in Southampton this weekend, it's empty too. (Reisig\_TS5\_051)

As luxury malls on Long Island (the source, Macy's Manhasset) watch sales decrease and some shutter for good taxpayers are made to believe that this mall will succeed. Why are the people of Floral Park shouldering all the burdens while

millionaire business owners and developers are gifted our land and dollars. (Tek\_167)

Why is there going to be retail center when local area stores and malls are closing. How is this supporting the community? (McGuire\_191)

The Mall as planned is unneeded. The future of retail is online, as evidenced by the billions in Amazon profits. What is needed is a supermarket and more green space. What is not needed is a 450 store mall that will be half vacant in 5 years. (Gorry\_219)

Brick and mortar retail is giving way to e-commerce. (Culotta\_222)

The Mall and shops will not be a sustainable draw. One only has to go to Green Acres mall only a few miles away or look at Deer Park outlets to see how they are not sustainable and are open areas for gang activity and potential problems. Or look to all the EMPTY storefronts dotting the Elmont, Bellerose, Floral Park and Queens areas to know that this won't be a great use of the land given the fact that everyone is moving to online shopping. (Schlechter\_204)

**Response:** Please see the response to Comment 1-66 in Chapter 22 of the FEIS, "Response to Public Comments."

#### *POTENTIAL COMPETITIVE EFFECTS—HOTEL*

**Comment 282:** There are several hotels that exist already in a three to five mile radius. Three at JFK, one major at Garden City, another one in Lynbrook. Who's going to a hotel in Elmont? (Thompson\_TS5\_089)

**Response:** Please see the response to Comment 1-61 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 283:** A hotel? Who will stay there? When it is underutilized, Curran will send Section 8 housing there or Cuomo will make a casino out of it. (Amato\_119)

**Response:** Please see the response to Comment 1-63 in Chapter 22 of the FEIS, "Response to Public Comments."

#### **WATER RESOURCES**

##### *GROUNDWATER RESOURCES*

**Comment 284:** Does the impact statement mention the impact that the contaminated water problem in Nassau County will have on the Elmont community wells? (Stowe\_TS5\_090)

**Response:** Please see the response to Comment 9-3 in Chapter 22 of the FEIS, "Response to Public Comments."

## CLIMATE CHANGE

**Comment 285:** We do not want any further expansion of fossil-fuel-powered projects. We need to develop renewable-energy-powered projects in all future developments. Our children's future depends on it. (Lyons\_147)

How about a green option using renewable resources that doesn't pose the threat of explosion? (Smith\_213)

**Response:** Please see the response to Comment 14-5 in Chapter 22 of the FEIS, "Response to Public Comments."

## TRANSPORTATION

### *TRAVEL DEMAND ANALYSIS*

**Comment 286:** The retail shopping experiences in Bicester United Kingdom and Shanghai China are cited in the EIS without any supporting information or lessons learned from those as well as Value Retail's other locations. As was noted during the public comments the "I Hate Bicester Village Traffic" webpage has over 3,000 members, which should give ESD some serious pause and concerns. ESD has an obligation to more closely delve into the impacts that already existing Value Retail operations have on the communities neighboring those operations. (McEnery\_180)

**Response:** Please see the response to Comment 11-27 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 287:** The arena would host more than 300 events per year, add in the retail village and hotel and you have an estimated 45,000 people coming to Belmont each day. Belmont Stakes day is a traffic nightmare in Floral Park. This would make it Belmont Stakes day every day. (Ronan\_TS5\_096)

What you are talking about will be every weekend and how many evenings during the week? (McCarren\_217)

**Response:** Please see the response to Comment 1-58 in Chapter 22 of the FEIS, "Response to Public Comments."

### *DETAILED ANALYSIS METHODOLOGIES*

**Comment 288:** The DEIS was grossly deficient. The analysis picked the wrong peak period. It used the time period that did not sync when Islander games start. Had they picked the correct peak period, the impacts would have been worse. (VFP\_TS5\_088, Ronan\_126)

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Response:** Please see the response to Comment 11-38 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 289:** The DEIS failed to consider traffic applications which divert traffic onto local roads and none of that was addressed in the Environmental Impact Statement. (VFP\_TS5\_088)

**Response:** Please see the response to Comment 11-212 in Chapter 22 of the FEIS, “Response to Public Comments.”

### *TRAFFIC CONDITIONS*

**Comment 290:** This arena will be a traffic/travel nightmare for Suffolk County residents whether by car or by train. (Barry\_195)

**Response:** Please see the response to Comment 11-54 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 291:** I am concerned about increased traffic and lack of infrastructure to support a project of this scale. (Fattorini\_209)

**Response:** Please see the response to Comment 11-73 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 292:** Our major concern is that there’s likely to be even additional commercial traffic from Eastern Long Island, deliveries, buses and, also, passenger cars because of the congestion on the Cross Island Parkway. The way that we see it for our enforcement efforts is that the additional traffic on Plainfield is basically an unfunded mandate on us to have to enforce the laws and take reports for additional accidents and that it’s imposed upon the Police Department as well as the residents of the Village. (McCarthy\_TS5\_060)

**Response:** Please see the responses to Comments 11-88 and 11-199 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 293:** The Cross Island Parkway is a nightmare. The hotel, shopping center and the events that will take place at the arena will undoubtedly exacerbate the issue at times. (Colombo\_026)

There are times of the day currently, every single day, where the traffic is so bad on Plainfield Avenue it becomes a line of idling cars at a standstill in front of my house—and that’s just with every-day, neighborhood, rush-hour traffic. Additional cars will paralyze these streets. (Fattorini\_209)

**Response:** Please see the response to Comment 11-55 in Chapter 22 of the FEIS, “Response to Public Comments.”

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**Memorandum of Responses to Public Comments on the FEIS**

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**Comment 294:** Plainfield Avenue is a horrible place to be late in the afternoon trying to move up or down, north or south. All I can tell you is, imagine what's going to happen once the arena starts bringing in a lot more traffic. (Weissman\_TS5\_062)

**Response:** Please see the response to Comment 11-67 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 295:** The increase of traffic on Plainfield Avenue would definitely have a negative impact on traffic congestion especially at the intersection at Tulip Avenue. This Village crossroad typically experiences nearly 10,000 vehicles now on a daily basis with Peak Travel times occurring between 5 P.M.- 7 P.M., which would coincide with event start times. This congestion would slow response times and also contribute to additional accidents occurring thereby further straining patrol deployments. (McAllister\_159)

Our town cannot withstand the traffic now at 5pm just getting dinner for the kids, how will we move in town with 5,000 to 6,000 cars for a 7:30pm Islander game. I heard you aren't widening the roads, come down Plainview and see how you wait 3 to 4 lights, what will happen when you add this additional traffic with not only cars but trucks with deliveries. (Reisig\_194)

**Response:** Please see the responses to Comments 11-56, 11-88, 11-199, and 11-237 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 296:** ESD said they're trying to protect the residential streets with a traffic management plan to keep cars on expressways. Let me be clear, they are all residential streets over there. The Cross Island is a parkway. The secondary roads in every direction from there all are one-lane residential streets that trucks will be forced to use since the parkway does not allow commercial vehicles. Never mind they'll be driving on the most dangerous road in New York State, as Hempstead Turnpike is repeatedly ranked. (Alfonsi\_TS5\_086)

**Response:** Please see the response to Comment 11-64 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 297:** The Cross Island Parkway, built in 1930, with no substantial improvements over the last 90 years, receives the poorest rating from New York City and New York State DOE and F as far as traffic flow. And I see no inclusion here of substantial capacity increase, extra lanes. The reconstruction of the Cross Island Parkway, that's imperative for this project to go through. Add additional capacity to the Cross Island Parkway. (Baggott\_TS5\_092)

**Response:** Please see the response to Comment 17-12 in Chapter 22 of the FEIS.

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Comment 298:** Traffic in Floral Park and on the Cross Island Parkway will come to a standstill and no one will want to hold an event at the arena. This plan is a lose-lose for everyone. (Prymaczek\_021)

Floral Park, Bellerose Village and Bellerose Terrace are already subjected to massive amounts of traffic on its major arteries. There are clearly no plans to address these issues. (Talty\_153)

**Response:** Please see the responses to Comments 11-61 and 11-67 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 299:** I firmly believe that the infrastructure, namely the surrounding roads, are not capable of sustaining the traffic volume that is bound to accompany New York Islanders home games. (Musynske\_018)

The Project is going to produce massive traffic congestions that will poison the quality of life for hundreds of thousands of residents near Belmont Park. (MacDonald\_200)

The additional traffic will seriously impact the Bellerose community during hockey games and major events. (BCCA\_212)

The traffic will bring the arteries to a standstill. Roads leading to Hempstead Turnpike. (Plainfield Avenue, Elmont Road, Springfield Blvd., Carnation Ave. and of course the Cross Island Parkway). (Gorry\_219)

**Response:** Please see the responses to Comments 11-54 and 11-59 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 300:** I’ve been very concerned with traffic and other impacts on the local communities. We have so much traffic now and I believe we would not be able to absorb the extra cars all your plans will generate with an arena, hotel and stores. (Henry\_125)

**Response:** Please see the response to Comment 11-67 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 301:** Intensive new development at Belmont will invariably result in greatly increased traffic travelling through the Village of Floral Park. For example, Plainfield Avenue is one of the few North-South traffic conduits in western Nassau County and will almost certainly experience a tremendous increase in traffic volume due to the proposed development. It’s the last route that connects Jericho Turnpike with Hempstead Turnpike east of the Cross Island Pkwy, which is located about 1.3 miles further west. Commercial vehicles are not permitted on the Cross Island Parkway, and would need to drive about 1.9 miles further west to 222nd St. to connect to Hempstead Turnpike. Springfield Boulevard is a full 2 miles west of Plainfield Avenue. Belmont Park Gate 8 is located about 1.1 miles south of Jericho Turnpike and provides access to the North and South parking fields. In

addition to commercial vehicles forbidden to use the Cross Island Parkway, it is also expected that traffic from neighboring communities such as Stewart Manor, New Hyde Park, North New Hyde Park, Garden City Park, Garden City, and Mineola is likely to increase through Floral park Village to attend events. (McAllister\_159)

**Response:** Please see the responses to Comments 11-88, 11-89, and 11-184 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 302:** The significant increase in traffic that will accompany the projected additional 45,000 daily visitors to the site, which is approximately the amount of the attendance at the Belmont Stakes when a Triple Crown [contender] is not at stake, will overwhelm the roadways in Floral Park and negatively impact our police and emergency vehicle response times. The increase in the vehicles in the last 10 years has put lot of pressure on the existing roads which ultimately results in road accidents. Motor vehicle crashes are a common cause of disability and place a demand for emergency medical care from our Police and Fire Rescue personnel further straining our existing manpower and continued drain on local municipal budget. (McAllister\_159)

**Response:** Please see the responses to Comments 11-91, 11-199, and 11-237 in Chapter 22 of the FEIS, “Response to Public Comments.”

#### *TRAFFIC ANALYSIS*

**Comment 303:** And what about the Retail Village? Tractor trailers and commercial vehicles will be brought in daily to stock the shelves, accommodate the restaurants and service the racetrack and hotel. (Emmel\_100)

More pertinent to a commercial vehicle-impaired neighborhood, they feature luxury coach buses called the Shopping Express® every day, busloads of shoppers will be brought through those same side streets of Queens from their NYC hotels and area airports to reach the mall. (Emmel\_100)

**Response:** Please see the response to Comment 11-64 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 304:** There has not been a complete analysis of the current traffic patterns or a simulation of the net effect of the anticipated increase in traffic. The project would only bring more traffic to the area that has the roadway that has been consistently ranked as the most dangerous in New York State—the Hempstead Turnpike. We are greatly concerned about the ambient air quality in the region. We are seeking a more comprehensive and in-depth review of the current and projected traffic patterns along with some insightful modeling (using proper and current tools) of the potential consequences on our air quality. (BPCC\_114)

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Response:** Please see the responses to Comments 11-42, 11-44, 11-58, and 11-212 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 305:** The traffic is horrendous now! It’s like the old days, when Belmont got out (prior to OTB coming in), bumper to bumper and they won’t let me turn down my block to go home! I don’t want to see traffic lights on every corner, like Queens...that’s not the solution. You don’t want to do anything about the traffic situation and forget about the Belt Parkway. (Amato\_119)

**Response:** Please see the responses to Comments 11-55 and 17-66 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 306:** The Cross Island Parkway is on the border of Cambria Heights. So although most of the discussion is about certain other communities, we also feel that we will be directly affected in terms of the traffic and potential security and safety concerns, which I haven’t heard any particular facets of the FEIS that address our concerns. (Marshall\_TS5\_087)

**Response:** Please see the responses to Comments 3-7, 11-47, and 11-217 in Chapter 22 of the FEIS, “Response to Public Comments.”

### *PARKING*

**Comment 307:** I mention the north lot’s plan to host up to 4,000 parking spaces. The resulting pollution will be immensely disruptive and intolerable to our community. (Mesnick\_TS5\_085)

**Response:** Please see the response to Comment 12-3 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 308:** Access to and from the East Parking lot and the South Parking 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 exist 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. Having 2,800 cars exiting the North Parking lot onto the Cross Island Parkway will also cause major congestion, delays and potentially be the cause of accidents as drivers try to merge onto the parkway. (Gribbins\_040)

**Response:** Please see the response to Comment 11-230 in Chapter 22 of the FEIS, “Response to Public Comments.”



*VEHICULAR AND PEDESTRIAN SAFETY*

**Comment 309:** We worry about the safety of our girls crossing the street with increased traffic congestion, as well as the large trucks and charter buses rolling through Plainfield Avenue on a daily basis. (Reisig\_194, Reisig\_TS5\_051)

Our concerns are mostly with safety concerns, specifically around Plainfield Avenue. Current conditions have already stressed the roadway. Traffic volume is already intolerable in the late afternoon and currently there's heavy commercial traffic including semi-trailers. (McCarthy\_TS5\_060)

**Response:** Please see the responses to Comments 11-199, 11-201, and 11-202 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 310:** You say "although the Proposed Project would result in an increase in traffic volumes on the roadways in the local street network and at intersections within the study area, it is not anticipated that the project-generated traffic volumes would unduly influence the rate of accident occurrence." Really? You can't possibly think increased traffic volumes won't result in a higher rate of accident occurrence. (Talty\_153)

**Response:** Please see the response to Comment 11-211 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 311:** Fans will be tailgating and partying pre and post games, how safe will it be with drunk drivers? (Reisig\_194)

**Response:** Please see the response to Comment 11-92 in Chapter 22 of the FEIS, "Response to Public Comments."

*TRAFFIC DIVERSIONS*

**Comment 312:** It is troubling that the Traffic Management Plan, which was not prepared at the Draft Environmental Impact statement, apparently is going to utilize traffic applications. Those applications will divert traffic from the Cross Island Parkway onto local roads. That's what they do. (VFP\_TS5\_088)

It's ironic that the TMP suggests that traffic apps could help ease congestion. Yes, traffic apps divert traffic off of major roads and help cars find "shortcuts" through residential neighborhoods! This is exactly what we don't want. We are already burdened by severe slowdowns on our bigger streets. (Ronan\_126)

**Response:** Please see the responses to Comments 11-212 and 17-21 in Chapter 22 of the FEIS, "Response to Public Comments."

*EMERGENCY VEHICLE RESPONSE TIMES*

**Comment 313:** Being 100 percent volunteer means our members are all working other jobs, coming from their homes and other places with their families wherever they may be when the call is transmitted and they need to respond. This means the need to respond to their respective fire houses in town, grab gear and equipment and respond on the apparatus back through town where the scene—to the scene where they have been dispatched. The village of Floral Park, as well as the surrounding towns and the majority of Nassau County is really a small town, suburban life with limited infrastructure and roads. With the exception of Jericho Turnpike, the entire village is comprised of narrow streets with one lane in each direction at most. The side streets basically allow for parking and one main lane down the middle. If you've ever tried to move a fire truck through these streets, you would know it can be a tough task on a good day. The village has already experienced an increased traffic flow, which clogs our roadways throughout the day. Traffic is ever increasing but there is no room to expand the infrastructure to alleviate the congestion. The village's main roads off Jericho Turnpike are Tulip Avenue and Plainfield Avenue. Plainfield Avenue runs directly between Jericho Turnpike, through the center of town to our neighbor on the south side, Belmont Park. Plainfield is a one-lane road that cannot possibly absorb any more traffic. We already have traffic backups and delays during the morning rush trying to get to work, trying to get our kids to schools. We have backups and delays when school gets out at 2:45 in both directions on Plainfield Avenue. From 4:00 in the afternoon all bets are off for the next three hours or more and the evening commute causes massive traffic backups in both directions on Plainfield and Tulip Avenues, our only two main roads in and out of town. Drivers will sit through changing street lights three or four times. In other words, the village is already saturated with traffic and the infrastructure cannot absorb any more. This project will add many times more traffic given its size and scope to an area that cannot handle any more. We are 100 percent volunteer department with a primary advance life support ambulance response. We are one of just a few left in the County that is primary advanced life support for first response. The village of Floral Park is a suburban community with many families and kids, as well as large elderly population with medical issues and needs. We respond to over 1,100 rescue or ambulance calls alone each year, not to mention the hundreds of fire calls. That means an average of three to five calls a day minimum that we need to get through traffic and delays. As I hope you understand, minutes can mean the difference between life and death in cardiac and stroke situations, as well as a whole host of other medical emergencies and it is not only medical. Fires are extremely dangerous situations that double in size every three to four minutes. That means a house fire can double in size and continue to grow very fast with that intense heat and even more dangerous situations. All this means is that lives are at stake and that certain situations may only have minutes to spare and that's just in our town. All of this has nothing to say is how difficult it can be at times

to get to our neighboring departments who calls for assistance or get them to us when we need help. Our primary area of mutual—one of our primary areas, mutual aid is Elmont and Belmont Park, our immediate neighbor to the south. This project will certainly bring thousands to Belmont Park, which can lead to increased calls and medical assistance. We need to be able to get there and help. The project right now is simply too big in its current form and will bring entirely too much additional traffic to our town. I am here to reiterate this major concern and implore you to please, please review the traffic patterns and make sure a complete, true and thorough traffic study has been done. (Longobardi\_TS5\_049)

We are already burdened by severe slowdowns on our major streets and worse, emergency response time would be slowed, risking lives. (Ronan\_TS5\_096)

How will our ambulances, fire, police get around town to help the people off our village? (Reisig\_194)

**Response:** Please see the response to Comment 11-237 in Chapter 22 of the FEIS, “Response to Public Comments.”

*GENERAL*

**Comment 314:** There was no real transportation analysis included in the DEIS. It had no mitigation plan discussed. It merely discussed that it would provide one in the future. I was Vice Chairman of the Nassau County Planning Commission and it is not uncommon to send back a deficient DEIS for further study. I think that’s what’s needed here for this board to look at the questions. The traffic analysis you provide today, perhaps may be a fantastic traffic analysis. You may be setting forth mitigation solutions but no one knows it. We have our own experts that could analyze it. New York City DOT is analyzing the question. This process should be started—reissued as a draft. Let the process play itself out. (Bambrick\_TS5\_050)

The DEIS was wholly deficient, based on fundamentally flawed assumptions concerning traffic and other impacts, and lack basic information such as competent traffic analysis to properly identify impacts and mitigation measures to address those impacts. (VFP\_169)

**Response:** Please see the response to Comment 11-248 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 315:** I am against the Belmont Park Redevelopment Project because the impact to vehicle traffic on our local roads and highways will be horrendous. 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 already heavily utilized. (Gribbins\_040)

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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**Response:** Please see the response to Comment 11-54 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 316:** The traffic during the annual Belmont Stakes has even stalled an ambulance during an emergency. The neighborhood is already burdened with a high volume of traffic on a daily basis and lack sufficient public transit—in particular, the Long Island Rail Road fails to serve our community except on one day a year for the Belmont Stakes. (BPCC\_114)

**Response:** Please see the responses to Comments 11-45, 11-120, and 11-237 in Chapter 22 of the FEIS, “Response to Public Comments.”

### **NOISE**

**Comment 317:** Many hockey games end around 10:00 p.m. A lot of concerts end later than that. Currently at these times, we hear birds and crickets in our neighborhood. The exhaust and noise from cars, the lights illuminating the lot, the litter that accompanies these crowds will be intolerable to nearby residents. One speaker mentioned that is tradition of Islander fans to sit in their cars and honk the horns following a victory. Someone earlier mentioned that it was a nightmare to her daughters to come home at 11:00 o’clock at night following a hockey game. How about putting your daughter to bed at 11:00 with 4,000 cars honking their horns? I don’t know where—I don’t appreciate that. (Mesnick\_TS5\_085)

**Response:** Please see the response to Comment 13-2 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 318:** What about noise pollution issues? (McNally\_190)

**Response:** Please see the response to Comment 13-1 in Chapter 22 of the FEIS, “Response to Public Comments.”

### **ALTERNATIVES**

**Comment 319:** There are so many abandoned factories on Route 110, that are not surrounded by residential homes and have wide roads to accommodate the traffic and the LIE is right there for the trucks to come and go. Why not there? After all, they are called the “Islanders” and that is in the middle of the “island.” (Amato\_128)

**Response:** Please see the response to Comment 16-4 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 320:** Why don’t you just let Belmont fix the track and the grounds, add a Cracker Barrel Store and a Stew Leonards, and maybe add a mini golf; that would all be keeping with green space. (Amato\_119)

**Response:** Please see the response to Comment 16-16 in Chapter 22 of the FEIS, “Response to Public Comments.”

#### MITIGATION

**Comment 321:** In the mitigation section of the DEIS, it states that there will be several instances where adverse traffic conditions will occur on local and highway roads. I feel that plans to use the TMP and TEAs along with certain road modifications, turn lanes, restriping, etc. to facilitate traffic flow is a pipe dream. Hempstead Turnpike is already a very heavily traveled road way. Any additional traffic can only result in chaos. (Gribbins\_040)

**Response:** Please see the response to Comment 17-10 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 322:** The DEIS stated that portions of the Cross Island Parkway are already at capacity. Nothing has changed since then. Mitigating traffic through signage, partnering with driving apps and promoting carpooling per the Transportation Management Plan is unrealistic and akin to fantasy. The CIP, which does not allow commercial vehicles, will become more congested and overflow traffic will spill onto our local roads. There are simply no alternate routes. Our infrastructure cannot handle the capacity for Belmont Stakes traffic (approx. 47,000 visitors daily) 200+ days a year, and our residents and police and emergency services will suffer. (Mesnick\_115)

Already during very heavy traffic conditions, streams of cars are noted on Commonwealth Boulevard and other local streets that are not constructed or configured for such heavy traffic. When fully operational for a major event, the proposed arena will attract thousands more cars exactly during the heavy rush hour period. Drivers will divert to local streets in order to move at all. (BCCA\_212)

**Response:** Please see the responses to Comments 11-91, 11-212, 17-15, and 17-20 in Chapter 22 of the FEIS, “Response to Public Comments.”

**Comment 323:** Your traffic mitigation “plans” are overly optimistic at best. You will use navigation apps, carpooling, and “arrive early and stay late” promotions to handle traffic to the venue. Navigation apps will shift traffic off of overburdened highways and main roads, routing it through our residential communities. Carpooling? Said from driving kids to/from school and sports, I know of no one on long Island who carpools. “Arrive early and stay late” promotions may ease some traffic, but more likely, it will simply shift the time of the traffic jams. It will certainly ensure that attendees time and money is spent on the property and not at businesses in the surrounding communities. (Martinez\_140)

To assume people will come early for a show is bad traffic planning. Also, this means more people in the lot and partying in the lot - disrupting local residents. (McGuire\_191)

Your suggestion of carpooling is crazy, or expecting the Islanders fan to stagger times of arrival and departure times, is totally insane! (Reisig\_194, Reisig\_TS5\_051)

Partnering with GPS services and driving apps, encouraging car pooling, laughable. (Mesnick\_TS5\_085)

Apps and incentives are being counted on as a cure-all for problems that aren't even completely accounted for yet and that were found to be unmitigated by the original study. (Smith\_213)

**Response:** Please see the responses to Comments 1-83, 17-15, and 17-20 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 324:** On page 17-38 of the FEIS, what is the TMP's "proactive approach" to preventing off-site parking? (Gunther\_205)

**Response:** Please see the response to Comment 17-54 in Chapter 22 of the FEIS, "Response to Public Comments."

**Comment 325:** Who will pay for increased bus service, which ESD's FEIS also states will be needed? The FEIS says: "Bus operators typically 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." (Fauss\_197)

**Response:** Please see the response to Comment 17-63 in Chapter 22 of the FEIS, "Response to Public Comments."

## **CUMULATIVE IMPACTS**

**Comment 326:** The Belmont Park property is over 400 acres and the cumulative impacts of its operations need to be evaluated as a whole and not segmented as is being done. (McEnery\_180)

The NYAP proposal is presented in a vacuum without identifying its impact in conjunction with the entire Belmont Park campus. (McEnery\_180)

**Response:** Please see the response to Comment 21-1 in Chapter 22 of the FEIS, "Response to Public Comments."

**GENERAL**

**Comment 327:** We are concerned about the impact that the project would have on traffic, infrastructure, and the environment. From diminished air quality and increased traffic to the depletion of our local water supply, these are serious considerations. The communities surrounding Belmont Park are keenly aware of the stresses the annual Belmont Stakes put on our infrastructure. Residents witness not only an increase in traffic, but have reported noise, air quality, and even a decrease in the availability of running potable water. (BPCC\_114)

This plan will strain infrastructure and law enforcement, eliminate open space, increase pollution, noise and crime. (Ronan\_TS5\_096)

**Response:** Please see the response to Comment 1-55 in Chapter 22 of the FEIS, “Response to Public Comments.”

*IN FAVOR*

**Comment 328:** Commenters expressed general support for the Proposed Project. (Abbott\_TS5\_066, Albanese\_004, Anderson\_203, Appel\_027, Archibald\_TS5\_107, Arzooman\_007, Babb\_TS5\_083, Bellissimo\_031, Boudreau\_003, Boudreau\_151, Capers\_TS5\_077, Cardiello\_TS5\_104, Charak\_152, Chung\_174, Cohen\_011, Colombo\_026, Curren\_TS5\_057, D’Arrico\_TS5\_102, DelPinnino\_046, Dillon\_017, Dowd\_TS5\_064, Ericson\_TS5\_070, Garry\_036, Grappone\_014, Goldman\_015, Gordon\_143, Herbst\_TS5\_069, Herbst\_163, Horton\_012, Isserlis\_041, Jerome\_029, Johnson\_101, Johnson\_TS5\_105, Johnson\_135, Kaminsky\_TS5\_054, Kaplan\_TS5\_055, Kerr\_016, Laron\_211, Law\_TS5\_053, Lawes\_TS5\_073, Mannucci\_034, Max\_010, Mulkeen\_005, Newman\_020, Nicols\_002, O’Grady\_043, O’Neill\_025, Philips\_TS5\_058, Prime\_TS5\_084, Rina\_TS5\_065, Schneider\_TS5\_103, Singer\_019, Sokol\_TS5\_067, Sokoloff\_024, Suaby\_TS5\_075, Tartaglione\_032, Tartaglione\_035, Teta\_013, Teta\_123, Tommy\_160, Tyburski\_148, Wallace, Jr.\_171, Welch\_133, Williams\_006)

**Response:** Comment noted.

*IN OPPOSITION*

**Comment 329:** In addition to opposition based on specific concerns noted elsewhere in this document, commenters expressed general opposition to the Proposed Project. (Ahrens\_156, Ahrens\_199, BPCC\_114, Emmel\_100, Fattorini\_209, Gorry\_219, Guilfoyle\_TS5\_063, Longobardi\_TS5\_047, MacDonald\_200, Musynske\_018, Reisig\_194, Reisig\_TS5\_051, Saunders\_134, Sexton\_149, Singh\_Ramkissoo\_120, Smith\_213, Talty\_153, Walsh\_022)

**Response:** Comment noted.

**D. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE FINAL ENVIRONMENTAL IMPACT STATEMENT<sup>2</sup>**

**ELECTED OFFICIALS**

1. Laura Curren, County Executive, oral comments delivered July 8, 2019 (Curren\_TS5\_057)
2. Kevin Fitzgerald, Deputy Mayor, Village of Floral Park, oral comments delivered July 8, 2019 (Fitzgerald\_TS5\_072)
3. Laura Gillen, Supervisor, Town of Hempstead, oral comments delivered July 8, 2019 (Gillen\_TS5\_082)
4. Frank Gunther, Chairman, Architectural Review Board, Floral Park, oral comments delivered July 8, 2019 (Gunther\_TS5\_095)
5. Todd Kaminsky, New York State Senate, oral comments delivered July 8, 2019 (Kaminsky\_TS5\_054)
6. Anna Kaplan, New York State Senate, oral comments delivered July 8, 2019 (Kaplan\_TS5\_055)
7. Dominick Longobardi, Mayor, Floral Park, oral comments delivered July 8, 2019 (Longobardi\_TS5\_047)
8. Michael Longobardi, Floral Park Fire Department, oral comments delivered July 8, 2019 (Longobardi\_TS5\_049)
9. Stephen G. McAllister, Police Commissioner, Floral Park Police Department, email dated July 25, 2019 (McAllister\_159)
10. Tom McCarthy, Lieutenant, Floral Park Police Department, oral comments delivered July 8, 2019 (McCarthy\_TS5\_060)
11. Thomas Muscarella, Nassau County Legislature, letter dated July 15, 2019 (Muscarella\_226)
12. Vincent Muscarella and Richard J. Nicoletto, Nassau County Legislature, letter dated July 31, 2019 (NCL\_181)
13. Lynn Pombonya, Trustee, Village of Floral Park, oral comments delivered July 8, 2019 (Pombonya\_TS5\_048)
14. Geoffrey Prime, Mayor, Village of South Floral Park, oral comments delivered July 8, 2019 (Prime\_TS5\_084)
15. Edward Ra, New York State Assembly, letter dated July 31, 2019 (Ra\_179)
16. Michelle Solages, New York State Assembly, letter dated March 1, 2019 (Solages\_182)
17. Village of Floral Park [Gerard Bambrick, Village Administrator, oral comments delivered July 8, 2019 (Bambrick\_TS5\_050) and letter dated July 29, 2019 (VFP\_169)]; [Joseph Fishinger, Director of Traffic Engineering NV5, oral comments delivered July 8, 2019 (VFP\_TS5\_056) and letter dated August 1, 2019 (VFP\_215)]; [Michael Murphy, Attorney Beverage & Diamond, oral comments delivered July 8, 2019 (VFP\_TS5\_088) and letter dated August 1, 2019 (VFP\_214)]

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<sup>2</sup> Citations in parentheses refer to internal comment tracking annotations.



**ORGANIZATIONS AND BUSINESSES**

18. Jessica Alfonsi, West End Civic Association, oral comments delivered July 8, 2019 (Alfonsi\_TS5\_086)
19. Victor Babb, All State Insurance, oral comments delivered July 8, 2019 (Babb\_TS5\_083)
20. Matthew Ericson, President, Building and Construction Trades Council, Nassau and Suffolk Counties, oral comments delivered July 8, 2019 (Ericson\_TS5\_070)
21. Rachael Fauss, Senior Research Analyst, Reinvent Albany, email dated July 22, 2019 (Fauss\_161) and letter dated August 1, 2019 (Fauss\_197)
22. Kim Fraczek, Director, Clean Energy Project, oral comments delivered July 8, 2019 (Fraczek\_TS5\_061)
23. Gary Harding, Executive Vice President, New York Islanders, oral comments delivered July 8, 2019 (Harding\_TS5\_091)
24. Richard C. Hellenbrecht, Corresponding Secretary/Treasurer, Bellerose Commonwealth Civic Association, letter dated August 1, 2019 (BCCA\_212)
25. Mark Herbst, Executive Director, Long Island Contractors Association, oral comments delivered July 8, 2019 (Herbst\_TS5\_069) and letter dated July 22, 2019 (Herbst\_163)
26. John Johnson, Elmont Cardinals Sports Club, oral comments delivered July 8, 2019 (Johnson\_TS5\_105)
27. Kevin Law, President and CEO, Long Island Association, oral comments delivered July 8, 2019 (Law\_TS5\_053)
28. Tania Lawes, New York Islanders, oral comments delivered July 8, 2019 (Lawes\_TS5\_073)
29. John Ledecy, Co-Owner, New York Islanders, oral comments delivered July 8, 2019 (Ledecy\_TS5\_059)
30. Delsia Marshall, Cambira Heights Civic Association, Belmont Park Community Coalition, oral comments delivered July 8, 2019 (Marshall\_TS5\_087)
31. Reverend Dr. Sunny Philips, Gateway Christian Center, oral comments delivered July 8, 2019 (Philips\_TS5\_058)
32. Aubrey Phillips, Belmont Park Community Coalition, oral comments delivered July 8, 2019 (Phillips\_TS5\_081)
33. Christy Reisig Floral Park Conservation Committee, oral comments delivered July 8, 2019 (Reisig\_TS5\_051)
34. Ann Rina, Community Relations Director, New York Islanders, oral comments delivered July 8, 2019 (Rina\_TS5\_065)
35. Sandra Smith, Chair, Elmont Coalition for Sustainable Development, oral comments delivered July 8, 2019 (Smith\_TS5\_108)
36. Joyce Stowe, President, Tudor Manor Civic Elmont, oral comments delivered July 8, 2019 (Stowe\_TS5\_090)
37. Maryann Viola, Secretary, Bellerose Terrace Civic Association, email dated July 22, 2019 (Viola\_111)
38. Travis Williams, President of Business Operations, New York Islanders, oral comments delivered July 8, 2019 (Williams\_TS5\_098)
39. Tammie S. Williams, Belmont Park Community Coalition, email dated July 9, 2019 (BPCC\_001), email dated July 17, 2019 (BPCC\_099), letter dated July 17, 2019 (BPCC\_221), emails dated July 20, 2019 (BPCC\_183) (BPCC\_184) (BPCC\_185), email dated July 22, 2019 (BPCC\_114), email dated July 24, 2019 (BPCC\_158), emails dated

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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July 26, 2019 (BPCC\_164) (BPCC\_165), letter dated July 27, 2019 (BPCC\_166), and email dated July 29, 2019 (BPCC\_170)

### **GENERAL PUBLIC**

40. Bill Abbott, oral comments delivered July 8, 2019 (Abbott\_TS5\_066)
41. Rachel Adams, email dated July 10, 2019 (Adams\_009)
42. Deborah Ahrens, emails dated July 23, 2019 (Ahrens\_156) and August 1, 2019 (Ahrens\_199) (Ahrens\_208)
43. Nicholas Albanese, email dated July 10, 2019 (Albanese\_004)
44. C Alleci, emails dated July 11, 2019 (Alleci\_028) and July 12, 2019 (Alleci\_030)
45. Virginia Amato, emails dated July 22, 2019 (Amato\_119), July 23, 2019 (Amato\_128), and July 30, 2019 (Amato\_172)
46. Michael T. Anderson, email dated August 1, 2019 (Anderson\_203)
47. Christopher Anskat, email dated July 23, 2019 (Anskat\_150)
48. Peter Appel, email dated July 11, 2019 (Appel\_027)
49. Reverend Archibald, oral comments delivered July 8, 2019 (Archibald\_TS5\_107)
50. Ed Arzooman, email dated July 10, 2019 (Arzooman\_007)
51. Andrea Baggott, email dated July 25, 2019 (Baggott\_162)
52. Daniel Baggott, email dated July 13, 2019 (Baggott\_039)
53. Ed Baggott, oral comments delivered July 8, 2019 (Baggott\_TS5\_092)
54. Vennus Ballen, email dated July 20, 2019 (Ballen\_186)
55. Lynne Barry, email dated July 31, 2019 (Barry\_195)
56. Lakshmi Basant, email dated July 23, 2019 (Basant\_155)
57. Joseph Bellissimo, email dated July 14, 2019 (Bellissimo\_031)
58. Chris Besozzi, email dated July 29, 2019 (Besozzi\_176)
59. Kenneth Boudreau, emails dated July 10, 2019 (Boudreau\_003) and July 23, 2019 (Boudreau\_151)
60. Joanne Burnacz, email dated July 23, 2019 (Burnacz\_138)
61. Tiffany Capers, oral comments delivered July 8, 2019 (Capers\_TS5\_077)
62. Christine Cardella, email dated July 29, 2019 (Cardella\_175)
63. Nicole Cardiello, oral comments delivered July 8, 2019 (Cardiello\_TS5\_104)
64. Fred Charak, email dated July 23, 2019 (Charak\_152)
65. Ed Chatterton, letter dated August 1, 2019 (Chatterton\_207)
66. Jenson Chin, email dated August 1, 2019 (Chin\_218)
67. Carlos Chung, email dated July 30, 2019 (Chung\_174)
68. Michael Cohen, email dated July 10, 2019 (Cohen\_011)
69. Jill Cohen, email dated July 23, 2019 (Cohen\_145)
70. Joseph Colombo, email dated July 11, 2019 (Colombo\_026)
71. Patty Costello, letter dated August 1, 2019 (Costello\_206)
72. Peter Craig, email dated July 30, 2019 (Craig\_178)
73. Michael Culotta, letter dated August 1, 2019 (Culotta\_222)
74. John and Lorraine D'Arrico, oral comments delivered July 8, 2019 (D'Arrico\_TS5\_102)
75. Ciro DelPinnino, email dated July 17, 2019 (DelPinnino\_046)
76. Nick Dillon, email dated July 10, 2019 (Dillon\_017)
77. Patrick Dowd, oral comments delivered July 8, 2019 (Dowd\_TS5\_064)
78. William F. Emmel, email dated July 18, 2019 (Emmel\_100)
79. Stephanie Fattorini, email dated August 1, 2019 (Fattorini\_209)
80. Timothy Finnegan, email dated July 10, 2019 (Finnegan\_008)

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**Memorandum of Responses to Public Comments on the FEIS**

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81. Douglas Forman, letter dated July 24, 2019 (Forman\_220)
82. James G, email dated July 23, 2019 (G\_129)
83. Christian Garry, email dated July 13, 2019 (Garry\_036)
84. Nialani Gaul, email dated July 23, 2019 (Gaul\_131)
85. Antoinette Gelfo, email dated July 23, 2019 (Gelfo\_127)
86. Becky Goldberg, email dated August 1, 2019 (Goldberg\_201)
87. Robert Goldman, email dated July 10, 2019 (Goldman\_015)
88. Neil Gordon, email dated July 23, 2019 (Gordon\_143)
89. Patricia Gormley, email dated July 22, 2019 (Gormley\_188)
90. Nancy Gorry, email dated August 1, 2019 (Gorry\_219)
91. Daniel Grappone, email dated July 10, 2019 (Grappone\_014)
92. Tony and Kathy Grego, letter dated July 30, 2019 (Grego\_177)
93. Phillip Gribbins, email dated July 15, 2019 (Gribbins\_040)
94. Liam Guilfoyle, oral comments delivered July 8, 2019 (Guilfoyle\_TS5\_063)
95. Francis C. Gunther, letter dated August 1, 2019 (Gunther\_205)
96. Christine A. Hartnett, email dated July 23, 2019 (Hartnett\_141)
97. Lynn Henry, email dated July 22, 2019 (Henry\_125)
98. John Horton, email dated July 10, 2019 (Horton\_012)
99. Michael Isserlis, email dated July 14, 2019 (Isserlis\_041)
100. Anu Jara, email dated July 14, 2019 (Jara\_033)
101. Chris Jerome, email dated July 11, 2019 (Jerome\_029)
102. Bernadette Johnson, letter dated July 23, 2019 (Johnson\_135)
103. Joshua Johnson, oral comments delivered July 8, 2019 (Johnson\_TS5\_106) and email dated July 17, 2019 (Johnson\_101)
104. Susan Jones, email dated July 31, 2019 (Jones\_193)
105. William Kelleher, oral comments delivered July 8, 2019 (Kelleher\_TS5\_093)
106. Nathan Kerr, email dated July 10, 2019 (Kerr\_016)
107. Nazrul Khandaker, email dated July 23, 2019 (Khandaker\_136)
108. Mattson Kokura, oral comments delivered July 8, 2019 (Kokura\_TS5\_076)
109. Robert Kuprian, email dated July 13, 2019 (Kuprian\_037)
110. Carl and Maryanne Laron, email dated August 1, 2019 (Laron\_211)
111. Donna Lidnskog, oral comments delivered July 8, 2019 (Lidnskog\_TS5\_097)
112. Kelly Lillibridge, oral comments delivered July 8, 2019 (Lillibridge\_TS5\_078)
113. John Lockwood, email dated August 1, 2019 (Lockwood\_210)
114. Patrick Lonergan, email dated August 1, 2019 (Lonergan\_198)
115. Randy Lunenfeld, email dated July 22, 2019 (Lunenfeld\_112)
116. Peggy Lyons, emails dated July 10, 2019 (Lyons\_023) and July 23, 2019 (Lyons\_146) (Lyons\_147)
117. Duncan A. MacDonald, emails dated July 23, 2019 (MacDonald\_139) and August 1, 2019 (MacDonald\_200)
118. Tara Macko, email dated July 30, 2019 (Macko\_173)
119. Michael Mannucci, email dated July 14, 2019 (Mannucci\_034)
120. Patricia Martinez, email dated July 23, 2019 (Martinez\_140)
121. Kyle Max, email dated July 10, 2019 (Max\_010)
122. Karen Heerey McCarren, email dated August 1, 2019 (McCarren\_217)
123. Heather McClintock, oral comments delivered July 8, 2019 (McClintock\_TS5\_080)
124. Brenda McDonald, oral comments delivered July 8, 2019 (McDonald\_TS5\_094)
125. Dennis McEnergy, letter dated July 31, 2019 (McEnergy\_180)

## **Belmont Park Redevelopment Civic and Land Use Improvement Project**

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126. James McGuire, oral comments delivered July 8, 2019 (McGuire\_TS5\_052)
127. Carolyn McGuire, email dated July 22, 2019 (McGuire\_191)
128. Brian Mchale, email dated July 22, 2019 (Mchale\_116)
129. Jon McNally, email dated July 22, 2019 (McNally\_190)
130. Russell Mesnick, oral comments delivered July 8, 2019 (Mesnick\_TS5\_085) and email dated July 22, 2019 (Mesnick\_115)
131. Joel Mittler, email dated July 23, 2019 (Mittler\_154)
132. Sheila Moriarty, email dated July 31, 2019 (Moriarty\_192)
133. Sherry & Robert Motlenski, email dated July 19, 2019 (Motlenski\_109)
134. Kenneth Mulkeen, email dated July 10, 2019 (Mulkeen\_005)
135. Jill Anne Munsch, email dated August 1, 2019 (Munsch\_216)
136. Graham T. Musynske, email dated July 10, 2019 (Musynske\_018)
137. Steven Newman, email dated July 10, 2019 (Newman\_020)
138. Marc Nicols, email dated July 9, 2019 (Nicols\_002)
139. Mike O'Grady, email dated July 15, 2019 (O'Grady\_043)
140. Ellen O'Neill, email dated July 10, 2019 (O'Neill\_025)
141. Theresa Paterno, oral comments delivered July 8, 2019 (Paterno\_TS5\_068)
142. Deena Perelman, email dated July 21, 2019 (Perelman\_187)
143. Eileen Prymaczek, email dated July 11, 2019 (Prymaczek\_021)
144. Omatee Ramkissoon, email dated July 22, 2019 (Ramkissoon\_117)
145. Kristol Ramkissoon, email dated July 23, 2019 (Ramkissoon\_144)
146. Amanda Ramrattan, email dated July 22, 2019 (Ramrattan\_118)
147. Christy Reisig, email dated July 31, 2019 (Reisig\_194)
148. Susan Rispoli, email dated July 22, 2019 (Rispoli\_122)
149. Christine Rizzo, email dated July 22, 2019 (Rizzo\_121)
150. Patricia Ronan, oral comments delivered July 8, 2019 (Ronan\_TS5\_096) and letter dated July 23, 2019 (Ronan\_126)
151. Marietta Russo, email dated July 23, 2019 (Russo\_130)
152. Kathryn Russo, email dated July 23, 2019 (Russo\_137)
153. Chris Sacco, email dated July 13, 2019 (Sacco\_038)
154. Truman Saunders, email dated July 23, 2019 (Saunders\_134)
155. Robert Scaramuccia, email dated July 22, 2019 (Scaramuccia\_124)
156. Margaret Schlechter, email dated August 1, 2019 (Schlechter\_204)
157. Sam Schneider, email dated July 15, 2019 (Schneider\_042)
158. Helene Schneider, oral comments delivered July 8, 2019 (Schneider\_TS5\_103)
159. Erik Seims, email dated July 31, 2019 (Seims\_196)
160. Andy Sexton, email dated July 23, 2019 (Sexton\_149)
161. John Sexton, email dated July 27, 2019 (Sexton\_168)
162. John T. Shea, email dated July 22, 2019 (Shea\_189)
163. Scott Singer, email dated July 10, 2019 (Singer\_019)
164. Sunardaye Singh Ramkissoon, email dated July 22, 2019 (Singh\_Ramkissoon\_120)
165. Bernadette Smith, oral comments delivered July 8, 2019 (Smith\_TS5\_079) and email dated August 1, 2019 (Smith\_213)
166. Erioca Lemke Sokol, oral comments delivered July 8, 2019 (Sokol\_TS5\_067)
167. Matthew Sokoloff, email dated July 10, 2019 (Sokoloff\_024)
168. Simonne Suaby, oral comments delivered July 8, 2019 (Suaby\_TS5\_075)
169. Amanda Talty, email dated July 23, 2019 (Talty\_153)

## Memorandum of Responses to Public Comments on the FEIS

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- 170. Mark Tartaglione, emails dated July 13, 2019 (Tartaglione\_035), July 14, 2019 (Tartaglione\_032) and July 16, 2019 (Tartaglione\_045)
- 171. Larry Tek, email dated July 27, 2019 (Tek\_167)
- 172. Erin Teta, email dated July 10, 2019 (Teta\_013)
- 173. Paul Teta, emails dated July 16, 2019 (Teta\_044) and July 22, 2019 (Teta\_123)
- 174. Dianne Thompson, oral comments delivered July 8, 2019 (Thompson\_TS5\_089)
- 175. Tommy, email dated July 25, 2019 (Tommy\_160)
- 176. Maria Trentacoste, oral comments delivered July 8, 2019 (Trentacoste\_TS5\_071) and email dated July 22, 2019 (Trentacoste\_113)
- 177. Doug Tyburski, email dated July 23, 2019 (Tyburski\_148)
- 178. Frank Viola, email dated July 22, 2019 (Viola\_110)
- 179. Oswald Wallace, Jr., email dated July 29, 2019 (Wallace, Jr.\_171)
- 180. Eileen Walsh, emails dated July 11, 2019 (Walsh\_022) and July 24, 2019 (Walsh\_157)
- 181. Natasha Warburton, email dated July 23, 2019 (Warburton\_132)
- 182. Dana Weissman, oral comments delivered July 8, 2019 (Weissman\_TS5\_062)
- 183. Morton Welch, email dated July 23, 2019 (Welch\_133)
- 184. Howard White, email dated August 1, 2019 (White\_202)
- 185. Pete Williams, email dated July 10, 2019 (Williams\_006)
- 186. Loves Witter, email dated July 23, 2019 (Witter\_142)
- 187. Nicholas Zacchea, oral comments delivered July 8, 2019 (Zacchea\_TS5\_074)

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