



Nassau County Planning Commission

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April 21, 2011

Ms. Erin Reilley
City of Glen Cove Community Development Agency
9 Glen Street
Glen Cove, NY 11542

Re: RXR Glen Isle Mixed-Use Waterfront Development Project
Draft Generic Environmental Impact Statement

Ms. Reilley,
The Nassau County Planning Department has reviewed the above-referenced Draft Environmental Impact Statement, pursuant to Article 8 of the Environmental Conservation Law (State Environmental Quality Review Act – SEQRA) and the implementing regulations therefore at 6 NYCRR § 617.3. Attached are comments relating to regional planning issues and concerns. Please feel free to contact me at (516)-571-1624 to discuss the comments in further detail. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Sood", is written over a horizontal line.

Satish Sood,
Deputy Commissioner

Cc: Martin Katz, Planner Supervisor
Sean Sallie, AICP, Planner III

Nassau County Planning Department
Comments on the RXR Glen Isle Mixed-Use Waterfront Development Project
Draft Generic Environmental Impact Statement

Land Use, Zoning and Public Policy

- The DGEIS should cite other comparable mixed use waterfront developments that have been successful.
- A table should be provided showing the number of acres and square footage as well as percentage of land devoted to the various proposed land uses, including open space
- A table should be provided showing FAR ranges for individual land uses and in total under the MW-3 PUD Proposed Action as well as for the alternatives analysis.
- This section mentioned that the Proposed Action constitutes Transit Oriented Development (TOD) on several occasions (i.e. Page 64, Policy #1, 1.1). While the Proposed Action shares certain characteristics of a TOD (i.e., density and mix of uses), does the Proposed Action actually constitute a TOD given the criteria that has been established for transit oriented development, specifically proximity and walkability to transit service. Does proximity to possible ferry service and the implementation of a proposed shuttle service to downtown Glen Cove constitute a TOD at this location? Also, this section mentions TOD in the context of the existing N21 and N27 bus routes, but is ambiguous as to whether these routes will actually serve the project area.
- Various views simulating the proposed development along the creek, particularly View 1 (Hempstead Harbor looking northeast to site) and View 4 (location along south side of Glen Cove Creek looking to site) indicate a development that may be out of scale with the surrounding area. It also appears that views of the abutting Garvies Point Preserve would be mostly blocked.

Alternative Analysis

- Reduced Height Alternative, Page 18, Paragraph 1- It is not clear how by reducing the maximum height to 10 stories a “wall” of uniform buildings would result. This would not necessarily be the case.
- The DGEIS does not consider an alternative that discusses build-out under the MW-3 (excluding the PUD Overlay District). The DGEIS should consider this alternative.

Transportation

- **Transportation, 4. Transit, (d) Mitigation Measures [pg. 81]:** While a new shuttle bus service serving the proposed development and downtown Glen Cove is proposed, it may be more economically and operationally feasible to extend existing public bus routes to directly service the project site. The DGEIS should incorporate a cost-benefit analysis that analyzes transit linkage alternatives.
- The DGEIS notes that parking lots at all three LIRR stations serving Glen Cove were fully occupied during weekday site visits and that the applicant has proposed providing a shuttle between the site and at least one of the stations. The developer has proposed a shuttle bus to the LIRR to serve what the DEIS estimates is 30-50 additional LIRR passengers during the morning and afternoon peak hours. The bus will be scheduled to meet all AM westbound trains and eastbound trains in the evening. The viability of the shuttle is questionable, however, given the projected number of LIRR commuters the

project is likely to generate. According to a 2002 study done by the Permanent Citizens Advisory Committee to the MTA, a successful shuttle bus service is defined as having a daily ridership of “50 passengers or greater.”

- There is no discussion about the construction-related traffic impacts in the Transportation Section. The discussion of construction-related traffic impacts in Construction is not adequate as it does not address truck traffic or impacts on other developments in the area that may occur throughout the construction phases of this project.
- Page 22 – Why use the LIPT growth rate when a more recent rate is available from NYMTC?
- Page 30 – Why use trip generation data based on the 7th edition of the ITE Trip Generation Handbook when the 8th edition is available?
- .Pedestrian Amenities - The DEIS refers to the creation of a “highly pedestrian-oriented neighborhood setting which encourages walking and strolling both as an alternate means of transportation and as a recreational activity.”(III.F-72) Although the document does not offer much in the way of detail (i.e. specific linkages within the site, routes) it does make reference to sidewalks that will be at least five feet wide, the minimum width for two-way pedestrian traffic. There are also references to connectivity between the site and the downtown, as well as to “wayfinding” signage that will assist pedestrians in navigating between the site and downtown. That’s a positive and often overlooked aspect of pedestrian improvements. There are references to intersection improvements at Charles Street/Herb Hill Road and Brewster Street /Herb Hill Road but it is unclear who has committed to making them, or if anyone has.
- It would be helpful to get some detail about the pedestrian amenities and connectivity between the project site and the nearest LIRR station, Glen Street, which is described as located “approximately one mile driving distance.” While the pedestrian shed for railroad stations is generally one-half mile, there may be some potential project residents willing walk further to reach the station without having to be concerned about parking.

Demographics

- **Demographics, 2. Potential Impacts, (c) Housing [pg. 14]:** While the proposed action includes the development of 86 workforce housing units, there is no mention of the definition of what constitutes a “workforce” unit. Given the need for affordable housing in Nassau County, as indicated in this section (“*This new housing stock would support the Master Plan goal of providing for a diversity of housing types and affordability and would help satisfy an identified County-wide need for workforce housing.*”), information on proposed income eligibility criteria and unit sale price restrictions should be included in the language of the PDD.

Community Facilities

- In this chapter, there was no analysis of sanitary sewage disposal. It is discussed in Cumulative Impacts Chapter, but it should be covered in the Community Facilities chapter.