

COMMENT CI-1:

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With respect to traffic, we believe that the estimated number of vehicle trips generated from the new project is underestimated and does not account for the cumulative traffic impact of the waterfront development in conjunction with all other proposed project in Glen Cove and neighboring communities is not considered...

IV-CUMULATIVE IMPACTS

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The developments described in this section do not consider projects in neighboring communities. Also, we feel that the number of additional vehicle trips that will result from the project is underestimated. If the 860 units proposed for the development project are estimated to draw 1,844 residents, the full build-out with an additional 780 residential would conceivably draw a similar number of residents. It is difficult to understand how an increase in population resulting from these two scenarios, not including population increases from other development projects, would generate the low number of vehicle trips estimated in the DEIS.

Karen Papasergious and Carol DiPaolo, President and Programs Director and Water-Monitoring Coordinator, Coalition to Save Hempstead Harbor, letter dated July 20, 2009.

RESPONSE CI-1:

The Cumulative Impacts section evaluated impacts from other pending developments that were identified in the Final Scope prepared for this project. These included the proposed Glen Cove ferry terminal and associated infrastructure, the Villas at Glen Cove, Glen Cove Mews, Lee Gray Court, and the MW-3 build-out under a PUD scenario. A public scoping session was conducted during the drafting of the scope and no other significant development projects within reasonable proximity were identified at that time.

The proposed project as evaluated in the DEIS was projected to generate 583 trips (254 in, 329 out) during the weekday AM peak hour, 826 trips (438 in, 388 out) during the weekday PM peak hour and 855 trips (461 in, 394 out) during the Saturday midday peak hour. As detailed in the Cumulative Impacts section, the build-out of the remainder of the MW-3 district is projected to generate an additional 326 trips (108 in, 218 out) during the weekday AM peak hour, 378 trips (219 in, 159 out) during the weekday PM peak hour, and 276 trips (151 in 125 out) during the Saturday peak hour.

These trip generation rates are based on empirical observations at other similar land uses that are documented and summarized in the standard reference manual, *Trip Generation, 7th Edition*, published by the Institute of Transportation Engineers. Due to the project's mixed-use and transit-oriented nature, it is expected to experience lower trip generation rates than those experienced at conventional, stand-alone type developments.

The DEIS traffic analysis accounted for the traffic from the other pending developments, as well as general background growth, in the No-Build Analysis. The potential traffic impacts resulting from the potential build out of the remainder of the MW-3 district are also analyzed and presented in Table IV. A-2, MW-3 Full Build-Out Level-of-Service Analysis Results. The

traffic analysis, including cumulative impacts, have been updated in this FEIS (see Appendix) to reflect the changes made to the Proposed Action since the publication of the DEIS.

COMMENT CI-2:

The proposed action is part of an overall plan of the City to redevelop the waterfront of the Glen Cove Creek. The FEIS should include additional analysis aimed at evaluating the impact of potential future phases of the waterfront redevelopment goal, including the feasibility of same considering the limited additional capacity of the Glen Cove Sewage Treatment Plant that will be left after the instant application, as well as other planned developments, area built.

As specific information (e.g., number of residential units, or GFA of commercial buildings) pertaining to future development plans of the Glen Cove Waterfront are not known at this time, the FEIS should provide a discussion relative to the environmental review procedures expected to be followed when future development is planned for this area.

Steven Perotta, Cashin Spinelli & Ferretti, LLC, letter dated July 20, 2009.

RESPONSE CI-2:

The DEIS Section IV includes an assessment of possible cumulative impacts related to potential future redevelopment of the waterfront area (the MW-3 district). As described in that section, the potential redevelopment of the balance of the MW-3 district was projected to generate sewage flows of approximately 378,000 gpd. When combined with the proposed project flows, this would increase the average daily sewage flow to approximately 885,000 gpd. This load, when added to the existing 3.8 million gpd currently processed by the City's treatment plant, would be well below its rated capacity of 5.5 mgd. The primary constraint is the capacity of the existing sanitary pumping station located near the existing Angler's Club facility. As indicated in the Utilities Section, there are three options being considered by the County for increasing the capacity of the existing pumping stations and force mains. These include:

1. Upgrade the existing pumping stations and force mains to include the projected flow.
2. Install a separate pumping station and force main(s) to convey the flow from the proposed development and possible future development of the balance of the MW-3 district to the Glen Cove Waste Water Treatment Plant.
3. Install a new pumping station and force main(s) incorporating both existing flows from this area of the City and the proposed development flow.

The Applicant has agreed to provide a study of the existing pumping station and force main as part of the first Site Plan application for the development. While the DEIS does provide analysis of the potential impacts from the full build-out of the balance of the waterfront area, any future proposal(s) for development of the remainder of the MW-3 district would be separate actions, and would be subject to their own SEQRA reviews.

COMMENT CI-3:

1. Section C. Water Use (page IV-B). The report indicates that the City Director of Public Works has advised that with the proposed increase demand resulting from the proposed Glen Isle project and the various other proposed developments in the City that there will not be sufficient well

capacity to meet future maximum demand in the event that one major well is out of service. The water usage for the additional 780 residential units and 50,000 square feet of office space is approximated to be 415,800 GPD for a total increase in water demand resulting from the Glen Isle project and additional developments to almost 1.1 MGD. The resulting increased maximum day demand deficits and potential maximum day plus fire demand deficits provide further basis for the City to complete an engineering study of water resources needs. This report should be submitted to the Department of Health for review and approval to provide justification for the installation of a new supply well, prior to the issuance of a certification of water availability for the proposed development by the City of Glen Cove.

Carlos A. Pareja, P.E., Bureau of Environmental Engineering, Nassau County Department of Public Health, letter, July 13, 2009.

RESPONSE CI-3:

As discussed in the DEIS, the City has indicated that, of the previously investigated sites for a new supply well to address the projected maximum day and potential maximum day demands plus fire flow deficits due to the proposed project and other proposed developments in the City, the existing Kelly Street well site appears to be the most viable location for a new well. According to the City's DPW Director, recent improvements to the Kelly Street well have addressed prior water quality issues and the well has been "clean" for several years. The addition of a second well at the Kelly Street site needs to be studied to confirm the yield / capacity of an additional well, the impact that a second well may have on the existing well and on the aquifer, the possibility for migration of on-site or off-site contaminants, and the potential to induce saltwater intrusion. The need for this study was not solely created by the proposed project, but is part of the City's need to identify additional water sources to support potential residential, commercial and industrial growth throughout the City, especially at the Konica-Minolta and PhotoCircuits sites.

The Applicant is willing to prepare or fund this study for the City prior to submittal of the detailed site plans for the first phase of the project. A study of this level will take several months to complete and will identify potential impacts of, and mitigation solutions for, a new supply well to address potential water deficit issues in the City in the event that one well is out of service.

See Response J-2 for additional discussion of the potential impacts of a new well at the Kelly Street site or elsewhere in the City and possible mitigation solutions.

COMMENT CI-4:

2. Section E. Sewage Discharge (page IV-14). The report identifies an additional projected sewage flow of 378,000 GPD from an additional 780 residential units and office space for a total increase in the average daily sanitary flow to approximately 885,000 GPD. The additional flow, when added to the existing 3.8 MGD processed by the City's treatment plant is reported to be below the treatment plant's rated capacity. In view of the information provided by the NCDPW personnel that there is insufficient capacity in the existing pumping station to handle any additional flow, the reported NCDPW study of specific improvements that are needed to

facilitate the conveyance of sewage from the proposed development should be completed and funded before an agreement is extended to provide sewer service for the proposed development.

Carlos A. Pareja, P.E., Bureau of Environmental Engineering, Nassau County Department of Public Health, letter, July 13, 2009.

RESPONSE CI-4:

The referenced 378,000 gpd figure is the projected potential flow from future redevelopment of the remainder of the MW-3 District. There are currently no known redevelopment proposals for this area. It is also noted that the majority of the remaining MW-3 District area is occupied with a variety of industrial and commercial uses. Redevelopment would replace those industrial uses that have historically used a portion of the sewage plant's capacity.

The NCDPW has issued an availability letter indicating that there is available capacity at the Glen Cove Wastewater Treatment Plant to treat the effluent proposed to be generated by the Glen Isle development. The letter also indicates that there is insufficient capacity in the existing pumping station on the north side of Glen Cove Creek and the force main which conveys the flow from this pumping station to the plant. Several options for addressing the pumping station and force main capacity issues were presented to the County and are pending review and approval. See Section III.J of the DEIS, which presents three engineering solutions for improving the pump station and force main capacities. All are technically feasible and would ensure adequate sanitary sewer service. The Applicant will comply with whichever alternative is ultimately selected by the County. As described in Response J-3 and CI-2, the Applicant has agreed to provide a study of the existing pumping station and force main as part of the first Site Plan application for the development.

COMMENT CI-5:

If the problem were only associated with this project it would be simpler to address. But the MW-3 zone that permits a higher residential density extends beyond the PUD area. The owners of large commercial properties that border the RXR-Glen Isle properties will seek to sell their properties and whoever acquires them will demand the same considerations in height, density and PILOTs as are provided to this developer's project.

David S. Nieri, letter dated July 18, 2009.

RESPONSE CI-5:

The DEIS studied the potential impact from the proposed project, as well as the possible future build-out of the MW-3 District. As detailed in the DEIS, the remainder of the MW-3 District outside of the project site could theoretically be redeveloped with up to an additional approximately 780 residential units and 50,000 square feet of office/commercial space. The MW-3 District was created specifically for the Glen Cove Creek area and was amended by the City Council to facilitate redevelopment. Any future proposals from landowners seeking to develop their properties would be subject to and governed by the existing bulk and use regulations of the MW-3 district. In addition, in accordance with NYS law, any proposals would be subject to their own SEQRA review.

COMMENT CI-6:

HHPC COMMENT # 16: Sea Cliff, Glenwood Landing and Glen Head are currently served primarily by aging and in some cases, failing septic and cesspool systems. When these systems fail, there is a possibility of septic wastes entering Hempstead Harbor. The availability of excess capacity at the Glen Cove Wastewater Treatment Facility presents the only real viable opportunity available to these nearby communities for connecting to a local wastewater treatment facility. As such, the City and County should carefully consider how it allocates this excess capacity. The DEIS states that the county's wastewater treatment plant can handle 5.5 MGD; that the average daily flow is 3.5 MGD and the peak flow was 4.5 MGD. The addition of the 507,000 GPD to the peak flow of 4.5 MGP brings the potential peak flow to over 5.0 MGD. The document also indicates that three additional developments (The Villa at Glen Cove, the Glen Cove Mews and Lee Gray Court) will collectively utilize an additional 166,500 gallons per day of capacity. At the same time, other projects have been approved for connection including The Birches and Glen Harbor Partners. The DEIS does not provide the figures from these projects. This leaves little excess capacity for the 5.5 MGD plant.

RECOMMENDATIONS: The FEIS should more fully address the capacity issue taking into account other approved and pending hookups and what the project would do to the ability of the plant to accept future hookups from the city and other local communities.

Eric Swenson, Executive Director, Hempstead Harbor Protection Committee, letter, dated July 13, 2009

RESPONSE CI-6:

See Response CI-2 and CI-5. The DEIS studied the potential impact from the project and all other known pending or recently approved projects identified in the DEIS scope, as well as the possible future build-out of the MW-3 District. These would be expected to combine for a total load of approximately 885,000 gpd. When added to the existing 3.8 million gpd currently processed, the plant would still be below its rated capacity and would have capacity to allow for potential future hookups. The NCDPW has also provided a letter indicating that the plant has sufficient capacity to accommodate the project.

The Birches is a neighborhood of approximately 49 homes and Glen Harbor Partners is an approximately 60-unit apartment building. Assuming an average 2-bedroom size for the apartments and three bedrooms for the homes in the Birches, sewage generation for these two projects would be estimated at approximately 61,000 gpd. This relatively small quantity would not result in exceedance of plant capacity.

Table CI-1
Estimated Sewage Demand from Glen Harbor Partners and the Birches

Component	Units/Size	Unit Daily Water Demand (gpd)	Daily Sewage Demand* (gpd)
2 Bedroom	60	522.5	28,215
3 Bedroom	49	742.5	32,744
Subtotal			60,959

*Sewage estimated at 90% of domestic water demand.