

**COMMENT I-1 (Community Facilities and Services):**

**Public School Child Generation**

Due to the large public cost for each PSC generated, it is important to utilize the most appropriate estimation methods possible in order for potential costs to be factored into the analysis. The public school child (‘PSC’) generation methodologies utilized appear to be generally consistent with standard approaches but this section does raise a concern. The methodology used to modify the rental generation does not seem to flow directly from the source data.

The local experience with Avalon indicates that 4 PSC have been generated in the development. This appears to indicate that for the local area, 306 bedrooms resulting solely from 1 and 2 bedroom types resulted in four PSC, which is a generation ratio of .013. This generation factor would then be appropriate to apply only to the 1 and 2 bedroom units of the proposed development. Absent any significant local data regarding generation from developments with three bedroom units, and with the understanding that child generation typically shows sharp increases with units above two bedrooms, generation factors for these units should be driven from the listed statistical methodologies.

<i>Apartment Types</i>	<i>Avalon at Glen Cove I</i>
Studio	41
1 bedroom	124
2 bedroom	91
Total Bedrooms (excluding studios)	30

Please refine the child generation methodology, only applying local examples to units sharing the same pricing/bedroom distribution, and the Rutgers or other similar statistical methodology for the balance.

*HR & A, New York, NY, letter dated July 20, 2009*

**RESPONSE I-1 (Community Facilities and Services):**

The Rutgers CUPR multipliers estimate that a three-bedroom rental unit would generate 0.63 public school children. Applying the requested .013 multiplier for the one- and two-bedroom units and the Rutgers multiplier for the three-bedroom units results in an estimate of approximately 53 public school children for the rental component. This would change the total estimated school age child attending public school impact for the FEIS Plan (incorporating adjustment based on local rental unit experience) from 180 to 128. This would still be lower than the estimated number of school age children provided by the Rutgers CUPR data, which is also presented in the DEIS and FEIS and which was utilized for the fiscal impact analysis.

**Table II.I-1  
Summary of Estimated School-Age Children Impact from Rental Component**

<b>Rental Units</b>	<b>Number of Units</b>	<b>Multiplier</b>	<b>Est. Public School Children</b>
1 and 2 Bedroom	428	.013	5.6
3 Bedroom	75	0.63	47.3
Total	--	--	53

**COMMENT I-2 (Community Facilities and Services):**

The DEIS states that the Glen Cove School district can absorb up to 742 additional students. It also says that the proposed action will result in an estimated 123-151 public school children and the cumulative impact on schools, when certain other developments in the proposal stage are factored in, could be more than 300 public school students. A closer examination of the DEIS reveals, however, that the elementary grades Kindergarten through 5th grade, which are housed in four schools, can only absorb a total of about 100 students since all are near full capacity with 92-95% utilization rates. (The middle and high schools are by comparison, under-utilized.) If there was an increase of more than 100 students at the K-5 grade levels due to the development, which is within the estimates provided by the DEIS then there might be more significant impacts to the school district than are noted in the DEIS, and thus, an offset to any school tax related revenue.

*Carol E. Kenary, President, Landing Pride Civic Association, Glen Cove, NY, letter dated July 20, 2009*

**RESPONSE I-2 (Community Facilities and Services):**

Updated enrollment information has been provided by the School District for the most recent 2010-2011 school year and is indicated in the table below. Schoolchildren are generally assigned to an elementary school by address. Since the closest K-2 school to the site is Deasy and the closest 3-5 school is Landing, these would be expected to be the elementary schools serving the site. Finley Middle School and the Glen Cove High School serve all public schoolchildren in the District.

The following table examines potential enrollments by school for the various flexibility scenarios and alternatives. The proposed FEIS Plan would be expected to generate approximately 180 students in total and 53 students in grades 3 to 6 (a portion of the estimated generated students in this cohort would be placed in the middle school.) Assuming a proportional split, approximately 40 students would be expected in grades 3 to 5. As indicated in the table, the District has available capacity of approximately 679 students. None of the scenarios would be anticipated to exceed capacities for Finley Middle School or Glen Cove High School. There could potentially be exceedances for the elementary schools under certain scenarios. It is noted that the worst-case capacity exceedance under the Alternative 2 – Modified Bedroom Mix scenario is relatively small (approximately 5-6% of reported capacity for Deasy and 5% for Landing). In addition, these exceedances are far less than the current condition at Connolly, suggesting that the reported capacities are not “hard” limits and that the School District can make adjustments within its existing facilities to accommodate. In the event that these schoolchildren were realized, it is likely that the school district would make relatively modest changes to district operations to accommodate rather than propose expansion of school facilities. It is also noted that the schoolchildren would not all enter the system at once, but would occur incrementally as the project is built-out over time. This would permit the District to assess actual schoolchildren generation and plan any necessary adjustments accordingly. Also, as noted in the calculations in Section I, the Applicant believes the CUPR multipliers are conservative and that actual schoolchildren generation, based upon a methodology that incorporates the findings of a site specific market study, would be significantly lower.

**Table II.I-2  
School Capacities**

Grades	K-2	K-2	3-5	3-5 <sup>3</sup>	6-8 <sup>3</sup>	9-12 <sup>3</sup>	K-12
Schools	Deasy	Gribbin	Connolly	Landing	Robert F. Finley	Glen Cove High School	District
Capacity <sup>1</sup>	427	372	352	350	1,100	1,100	3,701
Enrollment <sup>2</sup>	396	326	397	315	649	939	3,022
Available Capacity	31	46	-45	35	451	161	679
Potential Student Generation							
FEIS Plan	43	NA	NA	40	40	57	180
Modified BR Mix	44			41	41	62	188
Modified Tenure	30			31	34	55	150
Alternative 2	48			45	45	65	203
Modified BR Mix	55			52	53	79	239
Modified Tenure	37			39	44	70	190
Alternative 3	50			48	50	76	224

<sup>1</sup>Source: Aronstein, Dr. Laurence, Superintendent of Schools, Glen Cove City Schools, e-mail dated Feb. 10, 2009.

<sup>2</sup>Source: Cala, Marta, Glen Cove City Schools, phone call July 28, 2011.

<sup>3</sup>Based on proportional split of generation rates from Rutgers University, CUPR Residential Demographic Multipliers, June 2006.

As requested by the scope, the DEIS did also assess potential future cumulative build-out scenarios including full development of the MW-3 District. Including the proposed DEIS project, the cumulative build-out estimated approximately 58 students in K-2 and 86 students in 3-6. Assuming a proportional split, approximately 65 students would be expected in 3-5. The cumulative build-out with the modified FEIS Plan would be estimated to include approximately 71 students in K-2 and 97 students in 3-6. Assuming a proportional split, approximately 73 students would be expected in 3-5. This would be within the current available capacity in the K-2 schools, but would exceed capacity in the grade 3-5 schools. It is noted, however, that the bulk of the additional student population (138 out of 153) from the other projects considered in the cumulative assessment would be generated by the build-out of the remainder of the MW-3 district. There are no redevelopment proposals for this MW-3 area. Any eventual buildout of this area would be subject to its own SEQRA review, at which time the then current conditions in the school district could be evaluated.

**COMMENT I-3:**

That said, as a mother with school age children in the Glen Cove school system, my primary question is exactly what benefits to the schools will accrue due to the project both during construction and when the project is 100% built. Common sense tells me that most of the resident pool at Glen Isle will be either empty nesters or young singles and couples, so I would not expect much by way of school age children. Will the effect be similar to the Avalons, which I believe have only a few children who have entered into the Glen Cove school system, and exactly how area those figures derived?

*Eileen Owen Masio, letter dated July 20, 2009.*

**RESPONSE I-3:**

Over the past decades, demographic multipliers have become increasingly sophisticated and reliable. The estimates in the DEIS are derived from data compiled by the Rutgers University Center for Urban Policy Research based on the most recent US Census Public Use Microdata Sample (PUMS). The PUMS data allows for cross-tabulations of demographic characteristics by specific housing characteristics, such as number of bedrooms, type of housing product and tenure. The DEIS analysis also included demographic data from the recent Avalon project for the rental product to provide a local comparable. The market research and demographic analysis suggests that empty nesters and young households would indeed be a significant proportion of the buyer profile and that the project will generate relatively few schoolchildren. As described in Section I, the project would be expected to result in a net annual fiscal benefit to the Glen Cove City School District of approximately \$3.4 million.

**COMMENT I-4 (Community Facilities and Services):**

## Fire Mitigation

Developer response does not account for any additional mitigation, which does not address concerns raised in the February 10, 2009 letter from the Glen Cove Volunteer Fire Department. This letter states that there will be an ‘unspecified’ increased demand on staff, equipment and facilities.

Please address these concerns, in narrative format, including the potential costs or range of costs for any additional mitigation proposed.

*H R & A, New York, NY, letter dated July 20, 2009*

**RESPONSE I-4 (Community Facilities and Services):**

No additional mitigation related to fire services is currently proposed. While the Glen Cove Volunteer Fire Department noted that the anticipated number of calls will increase as a result of increased population, placing additional demand on the existing staff, equipment and facilities, it concluded by noting that it does not “foresee any problems or issues with development of this site.”

The City of Glen Cove 2009 Budget includes appropriations of \$770,314 for the Fire Department, which is utilized to pay salaries for fire alarm dispatchers – caretakers, as well as equipment replacement, repairs and maintenance, general supplies, and other expenses. As indicated in the DEIS, the project would generate City property tax revenues of approximately \$5,564,478 annually. In the 2009 budget, approximately 1.19% of total revenue was appropriated to the Fire Department. Applying this proportion to the annual City property tax generated by the project, the project would provide an additional approximately \$66,000 annually to the Department. Decisions regarding budget allocations are ultimately City Council decisions, however, and funding levels may be adjusted. It is clear, however, that a portion of the project-generated tax revenue could be utilized to pay for equipment replacement and maintenance to accommodate any potential needs resulting from the marginal increase in equipment usage generated by any increase in call volume.

At full buildout, the project would introduce a new residential population of approximately 1,904, an increase of approximately 7.1% of the City's population. Assuming a roughly proportionate increase in call demand, it is anticipated that the project could increase the number of additional annual service calls by approximately 7.1%, or approximately 46-50 calls annually.

The Fire Department has not indicated any particular equipment limitations in relation to the proposed development. It, therefore, does not appear that any additional equipment or facilities mitigation beyond the enhanced revenues for the Department's use would be warranted. The City and the Applicant highly value the services of the Department's volunteer staff and would be happy to help participate in promoting volunteerism. In addition, the project includes 86 workforce housing units. These units would be targeted to provide a housing resource for local community service providers, such as firemen, and intended to help facilitate the recruitment and retention of volunteers.

In accordance with the New York State Uniform Fire Prevention and Building Code, the project's multifamily and commercial buildings will have sprinklers installed, providing an additional level of fire safety protection. The project roadways and open space areas have also been designed for access to the proposed buildings by fire vehicles.

**COMMENT I-5 (Community Facilities and Services):**

The Fire Department wasn't able to outline the costs to upgrade their facilities, equipment, training and manpower needs to meet the demands of the proposed action but the DEIS must do more to address this very real cost to the city and its taxpayers.

*Carol E. Kenary, President, Landing Pride Civic Association, Glen Cove, NY, letter dated July 20, 2009*

**RESPONSE I-5 (Community Facilities and Services):**

See Response I-4.

**COMMENT I-6:**

34. Section III.I.2.c (*Environmental Impacts and Mitigation Measures: Community Facilities and Services: Potential Impacts: Fire Services*) - The DEIS states, on page III.I-14 "the Fire Department also noted that it did not foresee any problems or issues with the development of this site."; However, page III.I-3 notes that the Fire Department has only one 100 foot aerial ladder and the shadow analysis provided in III.M-1 indicates buildings to be as tall as 125 feet. It would seem that the Fire Department is not equipped to handle a development of this scale, and should a fire on the higher floors of taller building, or on the publicly accessible rooftops, occur there is the potential that the fire departments of neighboring municipality, which may have tall enough ladders, would be requested to aid in the fire fighting efforts. The FEIS should discuss the appropriateness of proposing buildings taller than what the City's fire department is reasonably able to service, and ensure that a neighboring fire department is equipped with tall enough ladders and within a reasonable response time of the subject property.

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

**RESPONSE I-6:**

An aerial ladder need not necessarily be as high as a building in order for effective firefighting. In urban areas it is not uncommon for buildings to be higher than the fire apparatus. (For example, the FDNY Ladder 24, based in midtown Manhattan has a 100' aerial. Typical FDNY ladder heights range from 75'-100'.) Therefore, while neighboring departments may provide mutual aid, there is no expectation that the project related equipment limitations will necessitate responses from departments other than the Glen Cove Volunteer Fire Department.

**COMMENT I-7 (Community Facilities and Services):**

EMS/Ambulance Mitigation

Developer response does not account for the costs of providing training and certification costs as proposed by GCVEMS.

Please address these concerns, in narrative format, including the potential costs or range of costs for any additional mitigation proposed.

*H R & A, New York, NY, letter dated July 20, 2009*

**RESPONSE I-7 (Community Facilities and Services):**

The suggested staff training for CPR and automated external defibrillator use, and the security personnel first responder training refers to the privately employed, on-site workers (i.e., not the community service providers). Any such training and attendant costs would be borne by the project itself, and would not impact public fiscal conditions.

**COMMENT I-8 (Community Facilities and Services):**

The EMS spoke of significantly increased wait times at the RXR Glen Isle site due to elevator wait times. How will this added wait time affect people from other parts of the city who may need EMS assistance? In addition to the expenses of bringing EMS up to the equipment and staff levels needed, the wait times could significantly impact people all over Glen Cove.

*Carol E. Kenary, President, Landing Pride Civic Association, Glen Cove, NY, letter dated July 20, 2009*

**RESPONSE I-8 (Community Facilities and Services):**

The Glen Cove Volunteer Emergency Service Corps indicated that responders could reach the project site within two minutes and reach the patient within six to eight minutes. The 2009 budget included appropriations for two additional paid emergency medical technician positions to guarantee 16-hour Advanced Life Support (ALS) coverage, which will be expanded to 24-hour coverage in 2010. This increased coverage will likely reduce response times. Calls for service to the proposed project would not be expected to significantly affect response times to other portions of the City. The Corps has multiple response vehicles (3 ALS ambulances, 2 BLS responders) that can be dispatched.

**COMMENT I-9:**

37. Section III.I.3.d (*Environmental Impacts and Mitigation Measures: Community Facilities and Services: Mitigation Measures: EMS/Ambulance*), page II.I-25, 1<sup>st</sup> ¶ - The DEIS states, as a mitigation measure, "the project developer is willing to place AED's [Automated External Defibrillators] in multiple high visibility locations." However, the GCVEMS required that on-site staff be trained in CPR and be EMT certified; these recommendations also should be included as mitigation measures.

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

**RESPONSE I-9:**

The Glen Cove Volunteer Emergency Service suggested that on-site staff be trained in CPR and automated external defibrillator use and that the security personnel be trained to certified first responder/emergency medical technician level. While the Applicant appreciates these suggestions, it is too early in the development process to know the education and certification details of potential future workers. In addition, the security personnel would likely be contracted through a private security company. Since the Applicant would not be directing their training, it is not in a position to make commitments regarding their certifications. Similarly, many other "staff" workers on-site may not be employed by the Applicant but by other operators of businesses on site (e.g., hotel, restaurants, office tenants.)

**COMMENT I-10 (Community Facilities and Services):**

The police department stated that they would need a minimum of 3 officers under the proposed action to handle increased call volume, or as many as 7 officers to bring their staffing levels, which are currently low, up to Department of Justice (D.O.J.) averages for municipal police departments. The DEIS quotes the minimum, but the impact could be higher if the department brings its staffing levels up to the D.O.J. averages. The DEIS minimizes this impact.

*Carol E. Kenary, President, Landing Pride Civic Association, Glen Cove, NY, letter dated July 20, 2009*

**RESPONSE I-10 (Community Facilities and Services):**

The 2009 City budget provides for three additional police officer positions and one planned retirement, bringing the force to approximately 54 officers. At full build-out the project would bring the City's population to approximately 28,868. This would result in a staffing ratio of 1.9 officers per 1,000 people. An additional three officers would bring the Department to its desired 2.0 ratio. As detailed in DEIS Section K, Economics, the anticipated annual cost for three additional officers would be approximately \$334,809. This figure was accounted for in the fiscal impact assessment, which indicated a large annual fiscal surplus for the City.

**COMMENT I-11:**

## f. Community Facilities and Services

"the availability of new housing opportunities and jobs would mitigate the potential adverse impacts to community facilities and services." COMMENT: Please have the authors explain how new housing and the corresponding increase in population, and the generation of a few below-median income jobs in the project will mitigate rather than exacerbate the increases that will be

necessary in police staffing, emergency services and fire services staffing, equipment and infrastructure, development of new water wells, increased handling of solid wastes, public works staffing increases, school staffing increases, and many more so-called "insignificant impacts" that will result from this undertaking. I strongly believe that the ultimate cost of these impacts will absorb any additional real estate tax receipts generated by the project over the long term, as the City tries to adjust to an initial 7% increase in population at this project alone.

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

**RESPONSE I-11:**

The referenced comment states "the property tax generated by the project and the availability of new housing opportunities and jobs would mitigate the potential adverse impacts to community facilities and services." The DEIS acknowledges that an increase in population will necessarily result in increased call demands for emergency service providers. However, the project will also generate significant property tax revenues that can be utilized to offset potential increases in costs for these departments. The project also includes 86 workforce housing units that would be targeted to provide a housing resource for local community service providers (e.g., teachers, emergency service volunteers, firemen, police, and other municipal employees) who would otherwise be challenged to find appropriate and more affordable housing alternatives.

The potential increase in public costs to provide services to the project were accounted for in the fiscal impact assessment provided in the DEIS, which shows a significant net fiscal benefit to the City.

**COMMENT I-12 (Community Facilities and Services):**

The proposed development will create overwhelming demands on fire and police protection, emergency services, schools, and other services.

*Alan Mitzner, President, American Pie, LLC, Sea Cliff resident, electronic mail, dated June 19, 2009. Similar comment from Raymond & Nansi Borom, 2 Laurel Way, Sea Cliff, NY, letter dated June 19, 2009 and Michael & Stephanie Lipsey, 95 8<sup>th</sup> Avenue, Sea Cliff, NY, three letters dated June 22 and 23, 2009*

It would have a negative effect on fire and police services, and the quality of life in this area.

*A. Gutierrez, letter dated July 15, 2009.*

The strain on our current infrastructure will be tremendous and much greater than the DEIS indicates including, fire services, police services, EMS, schools and waste removal.

*Linda Thompson, letter dated July 20, 2009.*

**RESPONSE I-12 (Community Facilities and Services):**

As acknowledged in the DEIS, the increase in residents and employees will result in increased demands on community service providers. However, the project also generates significant additional annual property tax revenue to accommodate potential marginal increases in public service costs. While the Glen Cove Volunteer Fire Department noted that the anticipated



number of calls will increase as a result of increased population, placing additional demand on the existing staff, equipment and facilities, it concluded by noting that it does not “foresee any problems or issues with development of this site.”

**COMMENT I-13:**

35. Section III.I.2.h (*Environmental Impacts and Mitigation Measures: Community Facilities and Services: Potential Impacts: Solid Waste*); page III.I-22 through III.I-23 - The DEIS presents information regarding solid waste. However, no mention is made regarding recycling measures to be incorporated at the proposed development. Given the quantity of waste estimated to be generated, 5.21 tons per day, recycling measures would be an important part of keeping the development "green".

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

**RESPONSE I-13:**

Comment noted. The Applicant is committed to incorporating green practices into the project, including provisions for recycling of items such as newspaper, glass containers, food and beverage cans, and plastic bottles. The refuse storage areas will include containers for recycled materials. The Applicant and project residents/tenants will be required to conform with the recycling regulations of the City and County.

**COMMENT I-14:**

36. Section III.I.2.h (*Environmental Impacts and Mitigation Measures: Community Facilities and Services: Potential Impacts: Solid Waste*), page III.I-23, 3rd ¶ - This paragraph in the DEIS states that the Glen Cove Solid Waste Transfer Station collected 118,133 tons of residential solid waste in 2007. However, page III.I-11 states that this facility handled 18,134 tons of waste during this year. This apparent discrepancy should be rectified.

The DEIS states "the residential and non-residential components of the proposed development would utilize private carters, who would contract with the City of Glen Cove transfer station or another solid waste transfer station for disposal." As the wording of the DEIS suggests the possibility that a transfer station other than that owned by the City may be utilized, these alternative facilities should be identified, and potential impacts on same discussed.

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

**RESPONSE I-14:**

Page III.I-23 contained a typographic error. In 2007, the transfer station collected 18,133.65 tons of residential solid waste and 2,422.53 tons of recyclables. This totals 20,556.48 tons, or approximately 56.3 tons daily. The addition of the project's estimated 5.6 tons of solid waste would still be well within the transfer station's 600 ton per day capacity.

The project would be served by private carters. The Glen Cove transfer station would be the closest facility and most likely candidate for use. It is possible that individual carters may contract with other facilities for disposal. However, attempting to identify what other facilities

would be used would be purely conjecture as it is subject to individual business arrangements that unknown entities will have several years in the future.

**COMMENT I-15:**

Since parks in the area are already severely underutilized, there is no need for additional parks in the waterfront area.

*Michael Brenner, letter dated July 13, 2009*

**RESPONSE I-15:**

The existing esplanade and Garvies Point Beach may be underutilized due to the unwelcoming and blighted character of the immediately surrounding area. It is expected that redevelopment of the project site will help make these resources more attractive for visitation. In addition, the City's Master Plan also explicitly calls for increased public accessibility and recreation along Glen Cove Creek:

“The Vision for Glen Cove Creek. Respect the natural, scenic and historic resources that define Glen Cove's ‘Gold Coast’ character, as well as manage development to encourage increased accessibility and recreational amenities along with a mix of complementary uses.”

Create a network of parks and open spaces in the Glen Cove Creek waterfront, adding up to a new “central park” for all of Glen Cove's residents.

**COMMENT I-16:**

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.

*Satish Sood, Deputy Commissioner, Nassau County Planning Commission, letter dated April 21, 2011.*

**RESPONSE I-16:**

Sanitary sewage generation and impacts are detailed on page I-40 and Section II.J, Utilities, of this FEIS.