COMMENT F-1 (Transportation):
For example, on first glance, we believe that the traffic analyses, especially the Remedial Action Plans, are overly optimistic about the impact the increased density this project will produce. One example, according to the DEIS, the anticipated problems at the Greenvale intersection of Glen Cove Road and Northern Boulevard will be resolved with a third through lane by the County. That would depend, however, on the County's acquisition of additional property taken from commercial establishments at that intersection, including a large Pathmark complex.

Carol Vogt, member, Village of Seacliff Board of Trustees, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009, Section 64, lines 11-25; Section 6, lines 1-4, pp.57-58

RESPONSE F-1 (Transportation):
Please refer to Response F-10. The DEIS does not conclude that the addition of a third southbound through lane at the intersection of Northern Boulevard and Glen Cove Road will fully resolve the congested conditions at this location. The section on Expected Traffic Impacts states that the intersection will continue to operate at LOS F during the weekday PM and Saturday peaks, even with the third southbound through lane.

The Applicant's traffic engineer has been unable to verify the County's intention to proceed with the final phase of the intersection improvements. Therefore, the analysis has been revised to evaluate future intersection operating conditions under the intersection geometry. As depicted in the LOS tables in Appendix U-2, if the County project is not implemented, overall intersection delays will continue to increase, as will delays for individual movements. This is an unavoidable impact which cannot be further mitigated by the Applicant. However, when considering that the proposed action has been designated as a project of regional significance by the Nassau Suffolk Regional Planning Council, the increase in delay time in relation to the overall potential benefits of the project is not substantial.

It should also be noted that the project impacts at this intersection can be partially mitigated by changes to the signal timing as indicated in the LOS tables. In fact, the analysis results reveal that both existing and future intersection operation can be improved and overall intersection delays can be reduced by a reallocation of signal timing. However, the timing falls under the jurisdiction of the NYSDOT and previous attempts by Nassau County to get the NYSDOT to adjust the timing have been unsuccessful.

COMMENT F-2 (Transportation):
Generally, we are concerned that the report underestimates the impact of the additional traffic, the 826 additional trips during weekday peak periods and the 855 midday on Saturdays. There's an underestimation, we believe, of that impact. And then an overestimation of the effectiveness of the proposed remedial actions, and we need some time to go through that to give you some more specific examples.

Carol Vogt, member, Village of Seacliff Board of Trustees, Public Hearing Transcript, City of Glen Cove Planning by Board Meeting, June 25, 2009, Section 65, lines 5-17; pp.58

RESPONSE F-2 (Transportation):
Please refer to Response F-10. The trip generation estimates were developed using the Institute of Transportation Engineer's (ITE) "Trip Generation" publication, which is the generally accepted reference source acknowledged by governmental agencies. In the case of the proposed action, the appropriate criteria and factors used to calculate the trip generation were discussed and reviewed extensively with the Planning Board's traffic engineering consultant.

In order to demonstrate the reasonableness of the projections, alternate trip generation estimates have been prepared using a different methodology and modifying the estimated percentage for transit usage. Table T-5A in Appendix T-5 is the trip generation summary contained in the DEIS. This table was developed by using the regression equations contained in the ITE publication, whenever one is provided. Table T-5B depicts the trip generation using the ITE average trip generation rates for all land uses, rather than the regression equations. Table T-5C depicts the use of the regression equations with reductions from 7% to 5% in the credits taken for transit for the residential and hotel components, as well as elimination of all transit credits for the other land uses. Since this latter approach resulted in slightly higher trip numbers, the future intersection volumes were recalculated and the capacity analyses were revised accordingly.

The trip projections are reasonable and are, in all likelihood, conservatively high. For instance, the analyses were conducted on the basis that traffic associated with each of the uses will peak simultaneously. In reality, however, the hotel, retail and restaurant peaks will not coincide with the residential and office uses. Additionally, with the introduction of ferry service contiguous to the site and the provision of shuttle service to the LIRR and the downtown business district, it is likely that the percentage of transit trips will exceed the 7% that was used in the DEIS.

COMMENT F-3 (Transportation):
The transportation mitigation that we see in the document from the developer's numbers seems to be the right step, a step in the right direction, seems to be the right --we have not had time to fully review the transportation part of the document, but between the ferry, the road widening and some things we want to see as the enhanced walkability within the site itself and what we feel are a mix of uses that will not generate the traffic that alternatives would, we feel the transportation is on point.

Mr. Eric Alexander, Executive Director, Vision Long Island, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009, Section 71, lines 9-23; p.63

RESPONSE F-3 (Transportation):
Comment noted.

COMMENT F-4 (Transportation):
In addition, the traffic created by just three two-family homes is very evident on Hammond Road with cars speeding up and down the hill. Shore Road has already become increasingly dangerous with drivers avoiding the new speed humps on Prospect who are trying to find less congestive routes heading south. One can just imagine the havoc that traffic created by this immense development will cause in Glen Cove, Sea Cliff and the surrounding area.

Ms. Barbara Hall, resident, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009, Section 84, lines 10-22, p.75

RESPONSE F-4 (Transportation):
The DEIS presents the anticipated traffic increases on local roads. The revised trip generation numbers discussed in Response F-2 above were assigned to the roadway network as shown in Figures F-10, F-11, and F-12 in Appendix T-6. The analysis results summarized in the LOS tables in Appendices T-10 and U-2 indicate that the roadway network in the surrounding area can readily accommodate the additional traffic generated by the proposed action without any significant impacts.

COMMENT F-5 (Transportation):
We will suffer the noise and smell of the big trucks on our street. Prospect/Albin is a narrow, windy residential street which is used as a cut-through. Despite all of our requests, even though there are signs prohibiting trucks on our street, they still speed along at all hours of the day. We have respectfully requested that the developer require all deliveries of material to travel by Route 107 and to obey the No Trucking Regulation on Prospect/Albin, and yet the Site Management Plan -- it speaks of a route map for trucks. And this is located in Appendix XXX; I was unable to find it.

Ms. Pat Tracy, resident, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009; Section 103, lines 14-25; Section 104, lines 1-7, pp 91-92. Similar comment in letter dated July 16, 2009.

The stress our residential roads will be subjected because of Glen Cove and Nassau County's Police Depts. inability to enforce present no truck laws on such streets, for example, Albin St / Prospect Ave.

Eileen Aherne, email dated July 20, 2009.

RESPONSE F-5 (Transportation):
Enforcement of the posted weight limits and truck restrictions is the responsibility of the Nassau County Police Department and/or Village police having jurisdiction. However, the developer will direct and encourage suppliers of materials and equipment to utilize Glen Cove Road as the primary delivery route when travelling to and from the site. Glen Cove Road provides direct access from all major east-west arterial highways to the site for delivery vehicles without impacting any local streets.

COMMENT F-6:
As a resident of Albin Street in Glen Cove I am very concerned about the additional traffic this will bring our already crowded and uncontrolled Street. We have trucks, motorcycles, buses and cars emitting fumes and noise that is untenable. We cannot sit out on our decks, our houses shake from the tonnage going up and down our street, not to even speak about the garbage that is thrown out the windows of cars. I am totally adverse to this project and the abuses I have suffered living in Glen Cove. Thank you for your attention to this matter.

Carla Polizzi, email dated July 16, 2009.

I was born and raised in Glen Cove. My mother still resides down on Shore Road, one of the communities that is impacted by residual traffic trying to find a cut through surrounding communities to get to and Glen Cove. It has become a problem. Hopefully, we can resolve that.

Theresa Hauck, 18 Edward Street, Roslyn Heights, NY, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009; Section 119, lines 7-15, p.106

Because the issue that I was particularly concerned with is transportation and traffic. And for me to just look at the roadway designations of which my particular street, Prospect/Albin, has not been assigned or identified of -- to their level of service. But that's -- that will be in my written comments.

Pamela Tamaddon, Coordinator of the Prospect/Albin Traffic Calming Initiative, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009; Section 124, lines 21-25; Section 125, lines 1-6, pp.110-111

The DEIS acknowledged that Prospect/Albin is a "bypass route", however the DEIS fails to address existing characteristics already exacerbated by cut-through traffic affecting, negatively the quality of life, health, safety &welfare of area residents. While the DEIS provides elaborate detail for LOS (level of service) of area roadways, this methodology addresses constraints and delays *an operator of* a *motor vehicle can expect.*

LOS (Level of Service) statistics identify traffic impacts geared towards *"preventing congestion"* and are neither inclusive nor reflective of impacts and constraints for other roadway users, pedestrians &cyclists or residents. With that the LOS data in the DEIS cannot be considered a conclusive investigation of the viability of *residential streets within the study* as it has not addressed the following conditions along this residential neighborhood street, Prospect/Albin.

- Lack of "Walkability, limited or no pedestrian right of way.
- Residential structures (homes) directly abutting the street
- Geological integrity of steep slopes &highly erodible soils, fly-ash, sand and silt
- Structural effects/damage to residential properties by vibration from increased traffic, resulting in diminished property values.
- Air quality in a existing non-attainment zone as identified by both the EPA & DEC
- Geometric constraints of street, narrow, steep, winding, limited sight vision and blind curves with limited or no pedestrian right of way
- Lack of street shoulders and curbs
- Non compliance with ADA Standards for identified roadways with an Urban Boundary Area
- Lack of drainage/mitigation of storm water run off
- Lack of incorporation of accident data and resulting property damage (Photos provided)
- Adverse impact on residential property values resulting from noise generated by increased traffic.

Pamela Tamaddon, Coordinator Prospect/Albin Traffic Calming Initiative, letter dated July 20, 2009.

RESPONSE F-6:

The Applicant cannot be held responsible for alleviating existing substandard conditions which are not the result of the proposed action. Observations of traffic activity on various occasions

indicate that the existing substandard geometry actually serves as a natural traffic calming measure. The amount of traffic that will be added to the Albin/Prospect route by the proposed action will not exacerbate any of the cited conditions. Even during peak hours, the addition of one vehicle in each direction every 2 to 3 minutes is not significant and is not expected to adversely impact safety or roadway operating conditions. Please refer to Response F-7 below for additional discussion on this issue.

COMMENT F-7:
Equally significant and of serious concern is that the DEIS while identifying intersections along Prospect/Albin it fails to provide a proper analysis of the inadequate ***Stopping and Intersection "Sight Distance"*** at these various intersections. The geometric conditions, hills, steep curves, change in area roadway width, blind turns, narrow steep secondary streets and lack of pedestrian right of way along Prospect/Albin do not meet even the minimum Sight Distance requirements as defined in the *AASHTO "Policy on Geometric Design of Highways and Streets.* As evident below.

The DEIS & the associated "experts" once again fail to adequately address, much less acknowledge the inadequate infrastructure required for a high density development as proposed by RXR/Glen Isle.

In closing "A Picture Speaks a Thousand Words". Prospect/Albin ***is narrow residential neighborhood street,*** despite the repeated attempts by the developer & their experts to present it otherwise.

Pamela Tamaddon, Coordinator Prospect/Albin Traffic Calming Initiative, letter dated July 20, 2009.

RESPONSE F-7:
The DEIS recognizes Prospect Avenue/Albin Street as a potential diversion route and assigns project related traffic accordingly. When viewed in the context of existing traffic, the number of vehicles that will be added to the Prospect /Albin route as a result of the proposed action is not expected to overburden the roadway infrastructure, nor is it expected to significantly impact pedestrian and bicycle safety. A review of the accident records summarized in the study prepared by Cameron Engineering on behalf of the City of Glen Cove and the Village of Sea Cliff does not reveal any pedestrian or bicycle accidents along the Prospect/Albin route in spite of the existing roadway geometry and roadside terrain which requires pedestrians and bicyclists to exercise caution when crossing or traveling along the road

The Cameron study identified three specific locations with poor sight distance. The report also contains recommendations to improve safety at each of these locations. At several intersections along the Prospect/Albin route, multi-way stop signs have been installed to enhance safety. These stop signs provide the added benefit of slowing traffic periodically along the road. Additionally, the traffic calming measures that have been implemented between Carpenter Avenue and Carpenter Avenue Extension appear to have further reduced vehicle speeds. The project generated traffic will not contribute to an increase in the frequency or severity of accidents along the Prospect/Albin route. However, based on the concerns of residents, as the

DEIS indicates, the implementation of additional traffic calming measures may be advisable to further enhance safety.

COMMENT F-8 (Transportation):
Our principal concerns with the Project are the *12-story* height of the buildings and the excessive traffic those buildings will generate given their density. We fear the increased traffic--with attendant noise and emissions--on Cliff Way as new residents commute to and from this site via Prospect and Bryant Avenues.

Victoria B. Bjorklund, Hank Bjorklund, 24 Cliff Way, Sea Cliff, NY, letter dated June 21, 2009

RESPONSE F-8 (Transportation):
The issue of building heights is addressed in Section I and II.M of this FEIS. However, it should be noted traffic that there is no direct correlation between building heights and trip generation. The DEIS and FEIS evaluate the anticipated traffic increases on Prospect and Bryant Avenues. As indicated by the LOS summaries in Appendix U-2, the roadway network is able to accommodate the additional traffic without any significant impacts. The potential for noise and air quality impacts are also evaluated and discussed in the DEIS ad FEIS Section II.G and H. No significant air quality or noise related impacts to sensitive receptors in Sea Cliff have been identified.

COMMENT F-9 (Transportation):
There are very, very many negative impacts which neither the City, nor the developer has any plans to mitigate. In fact, the way they plan to take care of traffic is to merely flatly state that there's not going to be any is preposterous. I wonder how many truckloads of material there will be, such as 2,500 bathtubs or toilets barreling down my street.

Ms. Pat Tracy, resident, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009; Section 102, lines 9-20;, p.91 and letter dated July 16, 2009.

RESPONSE F-9 (Transportation):
Please refer to Response F-10 below. The DEIS clearly identifies the anticipated traffic impacts and discusses potential mitigation measures, where applicable. In terms of construction materials and equipment, as indicated in Response F-5, the applicant will direct suppliers to use Glen Cove Road to access the site. Also, construction related traffic is a temporary and unavoidable impact, the magnitude of which will vary over the build-out of the project, which is anticipated to take up to 10 years. The actual number of construction related trips cannot be determined until such time as the site plans are finalized and approved by the City.

COMMENT F-10:
Our roads cannot support the additional volume of traffic congestion generated by 1,120 residences, and the project is far from public transportation.

Unknown commentor, copy of petition in Record Pilot, dated April 2007.

…however, I also understand there are still issues that need to be – that need resolution. Transportation is a very big issue.

Ms. Jadwiga Brown, resident of Sea Cliff, business owner, 40 Garvies Point Road, Glen Cove, Public Hearing Transcript, City of Glen Cove Planning Board Meeting, June 25, 2009; Section 109, lines 16-25; Section 113, lines 16-25, p.101

The additional traffic generated by the development will choke local roadways.

Alan Mitzner, President, American Pie, LLC, Sea Cliff resident, electronic mail, dated June 19, 2009. Similar comment from Michael & Stephanie Lipsey, 95 8th Avenue, Sea Cliff, NY, three letters dated June 22 and 23, 2009

The additional traffic generated by the development **will choke local roadways.** This is especially true along Shore Road and Bryant Avenue.

Raymond & Nansi Borom, 2 Laurel Way, Sea Cliff, NY, letter dated June 19, 2009

Traffic will be increased not only in Glen Cove, but at Greenvale (& Glen Cove Road) which is already bad enough.

Robert Wong, letter dated July 13, 2009.

Local traffic would increase in the area.

A. Gutierrez, letter dated July 15, 2009.

The traffic impact studies are outright preposterous.

Mary Normandia, letter dated July 20, 2009.

DEIS did not assess accurately impact on transportation (traffic) and environment

Maria Smilovic, Glen Cove resident, attachment to letter from Carol E. Kenary, President, Landing Pride Civic Association, Glen Cove, NY, dated July 13, 2009

Additional traffic generated by the proposed development will choke Glen Cove Road and invade local streets.

Andrew Quasha, letter dated July 20, 2009, with similar comment from Ellen Quasha.

RESPONSE F-10:

The DEIS contains a comprehensive analysis of the potential traffic impacts, which was conducted using generally accepted methodology and analysis procedures. Furthermore, the analysis parameters and study methodology were reviewed and discussed extensively with the Planning Board's traffic engineering consultant. The intersection capacity analyses were performed using SYNCHRO software, Version 6 which is a recognized and accepted traffic software package that complies with the analysis procedures set forth in the 2000 Highway capacity manual (HCM), a nationally recognized standard.The DEIS presents a fair and reasonable assessment of the project related impacts and potential mitigation measures.

COMMENT F-11:
I have lived in Sea Cliff on Prospect Avenue for 42 years. I have served the Village on both the ARB and the Landmarks Preservation Commission so that I am very well aware how important to a board or commission of any municipality are the comments from citizens who may be impacted by developments. I am most concerned about the very large growth of traffic that the proposed 860 apartments (just one part of the Glen Isle development) will have on not just all the very heavily traveled roads in Glen Cove but also on the many two lane roads in Sea Cliff, mine for example, and in Glenwood Landing, Glen Head, Roslyn Harbor, and Roslyn since they all lead to both 25A and the LIE and the Northern State Parkway. At rush hour in the morning and the evening I have experienced having to wait at least 3-5 minutes plus all the traffic lights on Glen Cove Road at the intersection of Northern Boulevard. It will without a doubt be a much longer wait to traverse Glen Cove Road. I shudder to think what the impact of all this car and truck traffic that people living and working at Glen Isle will create on all the single lane roads including mine in Sea Cliff, I am not against intelligent development of the area around the creek but this whole project is just too massive from every standpoint to bring anything but a serious downgrading of all the surrounding area including the city of Glen Cove.

Naomi S. Curtis, email dated July 20, 2009.

RESPONSE F-11:
The impacts of the project generated traffic, including future delay times at the study intersections, with and without the project, are presented in the tables in Appendix T-10. In most instances, particularly at the intersections in the immediate vicinity of the project site, the results of the analyses clearly reveal that the local roadways will not be overly congested.

First, it is important to note that the intersection of Northern Boulevard and Glen Cove Road requires far more significant improvement than that which is warranted by the levels of traffic that the proposed development will add to the intersection. As the LOS tables in Appendix U-2 reveal, without any mitigation, there will be an increase in overall intersection delay time during all analysis periods, as well as increases in delays to individual lane groups when comparing the No-Build and the Build conditions. However, as the tables indicate, much of the project related impact can be effectively mitigated through adjustments to the signal timing, even if the final phase of the County's intersection improvement project is not implemented. If the County does implement its proposed geometric improvements, the analysis results indicate that the intersection operation can actually be improved over existing conditions.

It is noted that the project site's zoning permits industrial use, which has the potential to generate more traffic than the proposed action.

COMMENT F-12 (Transportation):
The transportation mitigation including widening of roadways, ferry service and shuttle bus service to the Long Island Railroad addresses the intensification of use on the site.

Eric Alexander and Elissa Ward, Vision Long Island, 24 Woodbine Ave., Northport, NY, letter dated June 25, 2009, p.2

Shuttles to take residents to the train stations is a good idea and will help mitigate some rush hour traffic as well as reduce the need for multiple cars per household. The developer should work with Long Island Bus to bring bus service closer, if not into, the site to provide more transportation options.

Eric Alexander and Elissa Ward, Vision Long Island, 24 Woodbine Ave., Northport, NY, letter dated June 25, 2009, p.4

RESPONSE F-12 (Transportation):
Comment noted. The N21 and N27 routes currently terminate in downtown Glen Cove at the intersection of Glen Street and Bridge Street. Intermodal connections to and from the project's shuttle buses would be available at their current terminus. The Applicant concurs that extending bus service to the site would be appropriate and is willing to work with Long Island Bus to achieve that goal.

COMMENT F-13 (Transportation):
The distance from Dickson Street to the termination of Glen Street is approximately half a mile. This is twice as long as the general guideline of placing housing within one quarter of a mile from shops. One quarter mile is the typical distance at which the average person would walk rather than drive to a location. In order to ensure that as many as possible of the residents of this development walk to downtown rather than drive, the pedestrian experience should be enhanced to make it as comfortable a walk as possible. Some method of traffic calming should be added at Glen Cove Ave/Brewster Street, so that making that crossing is less dangerous and more comfortable.

Eric Alexander and Elissa Ward, Vision Long Island, 24 Woodbine Ave., Northport, NY, letter dated June 25, 2009, p.4

RESPONSE F-13 (Transportation):
The Applicant is committed to enhancing the pedestrian experience to the greatest extent possible on property which it controls and will cooperate with the City in order to continue the pedestrian connection to the downtown via Pratt Park. The intersection of Brewster Street/Herb Hill Road/Mill Hill contains pedestrian crosswalks and pedestrian signals to facilitate safe crossing into the downtown area. The applicant would be willing to contribute towards crosswalk enhancements and upgrading of the pedestrian signal indications with countdown timers to further promote safety.

COMMENT F-14 (Transportation):
We are still concerned with the traffic pattern at the entrance to our property with cars with trailers leaving the parking lot and cars entering the Club Driveway. Even with signage indicating the proper traffic flow, we feel that there may be some who don't understand or violate the required flow. This problem is increased by the shrubbery or trees shown in Exhibit II-6. We request that a qualified traffic engineering consultant review this situation.

James Riordan, Commodore, Hempstead Harbour Club, letter dated July15, 2009

RESPONSE F-14 (Transportation):
The final design of the boat trailer parking area and the entrance to the Hempstead Harbor Club, including the selection of plants and shrubs, will be refined during the site plan review process. However, the preliminary conceptual site plan shown in Exhibit I-2 would allow the Club entrance to function safely with proper signage. An AutoTURN diagram depicting the maneuverability of vehicles with boat trailers has been prepared and is included in Exhibits II.PD-2 through II.PD-4. Furthermore, it should be noted that observations of activity at the public boat ramp indicate that current use is extremely limited, even on weekends, thus minimizing the potential for conflicts with vehicles and trailers utilizing the designated area. An AutoTURN diagram depicting maneuverability of a Con-O-Lift for a potential design alternative with a new entrance for the Hempstead Harbor Club directly onto the circle at the end of Garvies Point Road is illustrated on Exhibit II.PD-4A. The suitability of access for fire trucks and other emergency vehicles for the eventual final design of the entrance area would be confirmed during the detailed Site Plan review process.

COMMENT F-15 (Transportation):
[Page II-40] What assumptions were used when developing the shared parking ratios?
Pat Cleary, AICP, Cleary Consulting, letter dated July20, 2009

RESPONSE F-15 (Transportation):
The shared parking ratios are derived from the model presented in the Urban Land Institute's Shared Parking (2nd Edition). An updated Shared Parking Report is attached which clarifies and more completely documents that the analysis is based upon the current industry standards as outlined in *Shared Parking* 2nd Edition.

COMMENT F-16 (Transportation):
Exhibit III.O-1 (Anticipated Phasing Schedule) indicates aggressive construction start date (within six months of the DEIS being deemed complete) as well as an end date of December 27, 2016. Unless the construction schedule is shortened, it is very likely that (given the mere six months allotted to obtain all necessary pre-construction, post-DEIS-completion approvals) Glen Isle may not be fully built until at least 2017. The DEIS should discuss that, should construction be thus delayed, a 2017 completion date will not alter the findings or results of the DEIS Traffic Analysis (i.e., ambient traffic growth is only 0.6 percent per year, there are no other significant planned projects expected between 2016 and 2017).
Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-16 (Transportation):
Based on an annual growth rate of only 0.6 percent, should the completion date be deferred to the year 2017, the findings and results of the DEIS traffic analysis will be essentially the same. This is particularly true since traffic associated with all of the other proposed projects in the general vicinity of the site has been included in our analysis. There are no other known significant planned projects which would substantially alter the findings contained in the DEIS.

COMMENT F-17 (Transportation):
The DEIS discusses funding for the redesign of Garvies Point Road, with "the goal is to have... construction bid documents can be completed in time for a Spring 2010 project start." This should be verified with the City of Glen Cove Department of Public Works.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-17 (Transportation):
Per discussions with the City of Glen Cove Department of Public Works, an engineering consultant has not yet been selected for the redesign of Garvies Point Road, but the project is currently scheduled to commence in the second half of the year 2010. Based on this, the roadway improvements should be completed well before the completion of the first phase of the proposed action.

COMMENT F-18 (Transportation):
Verify that at intersection geometries in the Synchro files match those provided in Appendix L-3. At Glen Cove Avenue & Charles Street, aerial images of the intersection indicate an existing northbound left turn storage lane; the Appendix does not include this storage lane or have proper lane widths. Glen Cove Avenue & Pratt Boulevard lane widths and intersection geometry also do not match what is provided; it is missing the second westbound right turn lane.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-18 (Transportation):
The intersection geometries and lane widths have been verified in the field. All discrepancies in the Synchro files have been revised to reflect the actual geometries and lane widths at all of the study intersections. Sketches of the intersection geometries are attached in Appendix T-1 and the revised Synchro reports are attached in Appendix T-8. A CD containing the entire Synchro files with all input parameters has been provided.

COMMENT F-19 (Transportation):
The Synchro outputs and Appendix L-2 turning movement counts appear to be out of order/do not match each other. Adhere to an established order, such as the list of study intersections.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-19 (Transportation):
The revised Synchro output reports provided in Appendix T-8 and turning movement counts provided in Appendix T-2 adhere to the list of study intersections found on page III.F-2 of the DEIS.

COMMENT F-20 (Transportation):
Existing, No-Action, and Action Synchro Reports included in the Appendices do not match the results given from the actual Synchro networks which were provided to our office via CD. For example, Brewster Street-Cottage Row/School Street, and Herb Hill Road-Charles Street have different results for all three peak hour scenarios). Verify that the included Synchro reports in the Appendices reflect the actual outputs of the Synchro analyses, and provide our office with updated Synchro analyses if necessary to reflect the output in the DEIS. If the files provided to our office are the appropriate ones, the DEIS Level of Service tables and result discussions should be revised accordingly.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-20 (Transportation):
The Synchro reports included in the appendices of the DEIS were printed with an earlier version of the software which accounts for the minor discrepancies with the Synchro files provided via CD to the Planning Board's traffic engineering consultant. The reports for the revised Synchro analyses contained in Appendices T-8 and U-3 have been printed using the latest version of the software and are consistent with the results contained on the updated CD. The revised Level-of-Service (LOS) tables contained in Appendices T-10 and U-2 are consistent with the results in the updated Synchro reports.

COMMENT F-21 (Transportation):
The text refers to vehicle classification counts being part of some of the intersection turning movement counts. Classification data could not be located in the Traffic Appendix; it should be provided.

RESPONSE F-21 (Transportation):
The vehicle classification counts, which dated back to 2004, were inadvertently omitted from the DEIS appendices. New sample classification counts have been obtained and included in Appendix T-3. The heavy vehicle percentages utilized in the updated Synchro analyses have been adjusted based on these recent classification counts.

COMMENT F-22 (Transportation):
The "Selection of Analysis Peak Hours" paragraph appears to be unnecessary. It indicates that network peak hours were established for the AM, PM, and Saturday peak periods, and yet the turning movement counts and Existing Synchro analysis files reflect each intersection's individual peak hour volumes. Since the intersection peak hour volumes were used as the basis for the Existing analyses, the DEIS should not call out individual peak hours as the "overall network peak hours."

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-22 (Transportation):
Comment noted. The discussion in the "Selection of Analysis Peak Hours" section of the DEIS was intended as a general overview only. For analysis purposes, the actual peak hours at each individual intersection were utilized in order to reflect the worst-case scenario.

COMMENT F-23 (Transportation):
Volumes listed in Figures for Existing, No-Action, and Action scenarios are not all legible. Provide figures with larger font, using 11"x17" paper if necessary.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-23 (Transportation):
All volume figures have been printed on 11"x17" paper and are attached in Appendix T-6.

COMMENT F-24 (Transportation):
Provide accident rate calculation sheets for each intersection. These sheets should include accident rate comparisons to New York State average accident rates for the two most frequent individual accident types (e.g., rear end, overtaking, right-angle, etc.).

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-24 (Transportation):
Accident rate calculation sheets for each intersection are attached in Appendix T-12. These calculation sheets include accident rate comparisons to the New York State average accident rates for the two most frequent individual accident types.

COMMENT F-25 (Transportation):
Several collision diagrams indicate certain accident types occurring with relatively high frequencies (such as 5 times or more). Page F-14 should not conclude that the diagrams reveal no significant accident patterns. The diagrams also should not be the basis for accident pattern identification; this should be done based on accident rate comparisons for different accident types.

RESPONSE F-25 (Transportation):
Accident rates are a function of intersection volumes and are not necessarily indicative of specific problematic patterns. Safety studies typically utilize accident frequency, rather than rate as the criteria for determining if remedial action is warranted. For instance, traffic signal warrant studies use five right angle accidents per year over a three year period as the minimum criteria to justify the installation of a signal based on accident experience. Upon reviewing the accident records, the only incidents which meet the 5 accidents per year criteria are rear end accidents at the Northern Boulevard/Glen Cove Road intersection. However, as discussed in Response F-27 below, these incidents are likely the result of the congestion at this location and the relatively

minimal increase in total intersection volume resulting from the proposed project is not likely to add to the frequency of these accidents.

COMMENT F-26 (Transportation):
Verify that the New York State average accident rates stated are the most recent values as provided on the NYSDOT website. Forest Avenue & Lattingtown Road is a 4-legged urban signalized intersection with one left lane and 5 or more lanes. The correct New York State average rate is 0.28 accidents per Million Entering Vehicles [MEV], while the stated value in the table is 0.26 accidents per MEV. Glen Cove Avenue & Morris Avenue is a 3 legged urban signalized intersection with more than 5 lanes, and a left turn lane. The average intersection rate should be 0.19 accidents per MEV, but the stated value in the table is 0.18 accidents per MEV.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-26 (Transportation):
Comment noted. The most recent values for the New York State average accident rates were used in the preparation of the accident rate calculation sheets contained herein (see Response F-24).

COMMENT F-27 (Transportation):
Many of the intersections experienced accident rates more than 2-3 times the New York State average. Excluding locations where this corresponds to 1-2 accidents per year (due to a low AADT yielding a high calculated accident rate), these instances should be specifically called out and discussed. It should also be discussed whether potential future improvements may ease the accident issue.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-27 (Transportation):
The following intersections have calculated accident rates that are more than two times the NY average: Brewster St/Glen Cove Ave & WB Charles St (20 accidents); Glen Cove Ave & Morris Ave (9 accidents); Brewster St & Herb Hill Rd/Mill Hill Rd/Shopping Center (19 accidents); Glen Cove Ave & Shore Rd (10 accidents); Glen Head Rd & NY 107 (Cedar Swamp Rd) (3 accidents); Herb Hill Rd & Dickson St/Garvies Point Rd (1 accident); Bryant Ave & Witte Lane (11 accidents). It should be noted that the AADTs used to calculate the accident rates were estimated from the peak hour turning movement counts at the intersections where 24 hour count data was not available. Therefore, the statistical reliability of these rate calculations is limited. Also, as can be seen at some of these locations, due to relatively low volumes, a minimal number of accidents over a three year period can result in a high calculated accident rate.

The accident data for the intersections of Brewster St/Glen Cove Ave/WB Charles St and Brewster St/Herb Hill Rd/Mill Hill Rd/Shopping Center was obtained prior to and during the re-construction of these intersections. Therefore, the previous accident rates at these locations are not indicative of the current conditions and not meaningful for analysis purposes.

The accident history at the intersection of Herb Hill Rd & Dickson St/Garvies Point Rd is also of limited relevance since this intersection is going to be reconstructed and, in all likelihood, will have different traffic controls.

At Glen Cove Avenue and Morris Avenue, there were 9 accidents over the three year period. Two of these involved overtaking vehicles which reflects a rate 12 times the statewide rate for this type of accident. These types of accidents are frequently the fault of aggressive driving and are not indicative of any roadway deficiencies or volume related problems.

At Glen Cove Avenue and Shore Road there were 10 accidents over the three year period, the most frequent being rear end (5 incidents) and right angle (2 incidents). Although these numbers exceed the Statewide average, it must be recognized that the rates have been calculated based on estimated AADT's. The Manual of Traffic Engineering Studies published by the ITE suggests that the primary criterion in defining high accident locations should be the frequency as opposed to the rate. In the case at hand, the actual number of accidents over the three year period is not excessive Furthermore, the relatively minimal increase in intersection volumes resulting from the subject project is not expected to contribute to making this situation worse.

At Glen Head Road and Route 107, there were only 3 incidents over the three year period, which is not excessive.

At Bryant Avenue at Witte Lane, 6 of the 11 incidents were rear end collisions and 3 involved left turns. While these numbers result in a calculated rate which substantially exceeds the average statewide rate, this is primarily due to the relatively light volumes upon which the rate is calculated. As discussed above, based solely on the number of accidents, this location would appear not to be considered a high accident location by normally accepted standards And the minimal traffic that will be added to this intersection by the proposed project is not expected to result in an increase in accident frequency. Furthermore, the recent improvements that were undertaken at this location are expected to have a positive benefit in terms of overall intersection safety.

Of the remaining intersections, the majority experienced 6 or fewer accidents over the three year period. The exceptions are the busier intersections including Brewster Street at Cottage Row/School Street (10 incidents); Glen Cove Road at Glen Head Road (18 incidents); and Glen Cove Road at Northern Boulevard (25 incidents). Except for the Brewster Street/Cottage Row/School Street intersection, the predominant type of crash at these locations was rear end collisions, which are typical for signalized intersections. At the Brewster Street/Cottage Row/School Street intersection, right angle and left turn accidents (4 of each type) were the most common type of crashes.

At Glen Cove Road and Glen Head Road, the occurrence of 9 rear end accidents over a three year period, while above the statewide average, is not excessive and is likely the result of traffic congestion. The proposed mitigation measures, which will improve intersection capacity and reduce congestion, may actually serve to reduce the potential for such occurrences in the future.

At Glen Cove Road and Northern Boulevard, the occurrence of 15 rear-end accidents over a three year period is most likely the result of the congestion at this location and resulting driver impatience. The relatively minimal increase in overall intersection volumes resulting from the proposed project is not expected to have a measurable impact on the frequency or rate of accidents rate at this location.

COMMENT F-28 (Transportation):
The DEIS should refer to a 56-acre site, not a 96-acre site.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-28 (Transportation):
Comment noted.

COMMENT F-29 (Transportation):
The Synchro analysis files use a typical value of 1.0 for a growth factor throughout, except for the eastbound left turn movement at Charles Street-Glen Cove Avenue, which uses 0.5. This different growth factor should be explained or revised.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-29 (Transportation):
The growth factor for the eastbound left turn movement at Charles Street-Glen Cove Avenue has been revised and the Synchro analyses now uses the typical value of 1.0.

COMMENT F-30 (Transportation):
Peak Hour Factors are incorrect at several intersections, including Glen Cove Avenue-Morris Avenue and Bryant Avenue-Witte Lane. The Synchro analyses need to match the data in the Traffic Appendix.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-30 (Transportation):
Comment noted. All inconsistencies regarding peak hour factors have been revised. For existing conditions analyses, the peak hour factors derived from the actual turning movement counts have been utilized. For future conditions, a peak hour factor of 0.92 was applied to all approaches, except when the existing peak hour factor was greater than 0.92. This practice is consistent with the recommendations in the Highway Capacity Manual for future planning projections.

COMMENT F-31 (Transportation):
For unsignalized intersections, the Appendix should show the Timing sheet screen shot instead of the HCM Unsignalized Report. The HCM report does not typically match the Synchro analysis exactly.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-31 (Transportation):
The Timing sheet screen shots for each of the unsignalized intersections are attached in Appendix T-9.

COMMENT F-32 (Transportation):
Cite the sources where the "Other Project Trip" Generation data was calculated: either a submitted traffic study for those other projects, or ITE *Trip Generation* manual calculations.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-32 (Transportation):
The trip generation data for the ***Glen Cove Creek Ferry Terminal and Boat Basin*** project was obtained from the *Draft Design Report/Environmental Assessment* prepared by Urbitran Associates, Inc. The number of trips was estimated based on the report "Ridership Demand Analysis – Glen Cove Ferry Terminal and Boat Basin", which was also prepared by Urbitran Associates, Inc.

The trip generation data for the ***Glen Cove Mews*** project was obtained from the *Traffic Impact Study* prepared by Eschbacher Engineering, P.C., dated May 2006. The number of trips was estimated using the regression equations for residential condominiums/townhouses (Land Use Code #230) provided in the ITE *Trip Generation* manual.

The trip generation data for the ***Glen Cove Villas*** project was obtained from the *Draft Environmental Impact Statement* prepared by Urbitran Associates, Inc., dated August 2008. The number of trips was estimated using the regression equations for residential condominiums/townhouses (Land Use Code #230) provided in the ITE *Trip Generation* manual and applying a credit for trips produced by existing uses on the site.

The trip generation data for the ***Lee Gray Court*** project was obtained from the *Traffic Impact Analysis Report* prepared by Eschbacher VHB, dated September 2008. The number of trips was estimated using the regression equations for residential condominiums/townhouses (Land Use Code #230) provided in the ITE *Trip Generation* manual.

COMMENT F-33 (Transportation):
Show a table with the Existing Volumes, the Ambient No Action volumes (ambient growth only), No Action volumes (including other planned project trips), and Action volumes in addition to showing the volumes in the Figures.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-33 (Transportation):
A table showing the Existing Volumes, the Ambient No Action volumes (ambient growth only), No Action volumes (including other planned project trips), and Action volumes is provided in Appendix T-7.

COMMENT F-34 (Transportation):
Verify that each signalized intersection's signal timings remain the same between the No-Action and Action (unmitigated) Synchro networks; Brewster Street-Cottage Row/School Street signal timings are different. If a different timing plan is proposed, the change should be described as a proposed transportation improvement and included as part of the Action-Mitigated Synchro network.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-34 (Transportation):
The Synchro networks have been revised such that all signalized intersections have the same signal timing for the Existing, Future No-Action and Proposed Action (unmitigated) conditions. The Proposed Action-Mitigated network includes recommended changes to the signal timing plans. The revised Synchro Reports are attached in Appendix T-8.

COMMENT F-35 (Transportation):
Synchro analysis of Glen Cove Road-Northern Boulevard: No Build geometry does not reflect planned roadway improvements that are discussed in the DEIS. The stated "Phase 1 Construction - Completed" northbound approach does not reflect what is currently in the field or input into the Synchro analysis. The applicant should verify the completion progress of Phase 1 and correct the Existing, No-Action, and Action Synchro analyses accordingly.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-35 (Transportation):
The existing configuration of the intersection of Glen Cove Road and Northern Boulevard is as follows: the eastbound and westbound approaches have two exclusive left-turn lanes, one exclusive through lane, and one shared through/right-turn lane; the northbound approach has one exclusive left-turn lane, two exclusive through lanes, and one exclusive right-turn lane; and the southbound approach has one exclusive left-turn lane, two exclusive through lanes, and two exclusive right-turn lanes.

The future mitigated configuration of the intersection of Glen Cove Road and Northern Boulevard is as follows: the eastbound and westbound approaches have two exclusive left-turn lanes, one exclusive through lane, and one shared through/right-turn lane; the northbound approach has one exclusive left-turn lane, two exclusive through lanes, and one exclusive right-

turn lane; the southbound approach has one exclusive left-turn lane, two exclusive through lanes, a shared through/right- turn lane and one exclusive right-turn lane.

The Synchro networks have been revised to reflect these configurations accordingly.

COMMENT F-36 (Transportation):
State the actual square footage of all catering/restaurant facilities to avoid the misconception of a discrepancy between the DEIS and the Final Scope. The Scope states 25,000 s.f. of cultural uses, retail space, and restaurant; the DEIS states 20,000 s.f. of cultural, retail, and an unknown amount of catering/restaurant facilities on page III.F-30.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-36 (Transportation):
The proposed mixed-use development includes 5,000 square-feet of catering/restaurant facilities and approximately 20,000 square-feet of cultural/arts, entertainment uses, and complementary retail space.

COMMENT F-37 (Transportation):
The Transit Oriented Development ("TOD") 7 percent trip reduction is reasonable for commuter trips. However, it appears this credit· was applied to all trips, including non-commuter trips. Either the breakdown between AM and PM commuter trips vs. all other trips should be quantified or the TOD-based 7 percent trip reduction should be removed or reduced.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-37 (Transportation):
The 7 percent transit factor is reasonable and realistic based on the Transit-oriented design nature of the proposed action. However, in order to be conservative, new trip generation estimates have been developed using transit factors of 5 percent for the residential and hotel components of the project and 0 percent for the marina, office, retail and restaurant spaces. The latest revised trip generation estimates can be found in Appendix U-1. As can be seen, the overall changes in site generated traffic are relatively minor. These revised trip generation figures have been used in the updated intersection analyses.

COMMENT F-38:
28. Section III.F.4.c *(Environmental Impacts and Mitigation Measures: Transportation: Transit: Future Conditions with the Proposed Action),* page III.F-80 through III.F-81 - The DEIS provides estimates of transit ridership (i.e., LIRR and LI Bus) based on "trip generation projections and census statistics on modal choices." The census statistics utilized to generate potential transit ridership estimates should be provided, as well as providing the methodology used to extrapolate estimated transit ridership from this data. Additionally, the previous section discussing existing transit ridership should provide information regarding the number/percentage

of Glen Cove residents who currently use LIRR and/or LI Bus based on actual ridership data provided by the MTA.

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

RESPONSE F-38:
A copy of the census data which presents transit usage statistics for the City of Glen Cove is attached in Appendix T-4. As can be seen, the percent using rail is 4.5% and the percent using buses is 1.6%, for a combined total of 6.1%. By applying these percentages to the total number of residential trips, it is possible to obtain a reasonable approximation of the anticipated future ridership.

As noted in Response F-37 above, revised trip generation estimates have been developed using a transit credit of only 5% for the residential and hotel components and no transit credit for the other land use components. However, based on the Applicant's intention to provide shuttle bus service to nearby LIRR stations and the downtown business district, the availability of existing Long Island Bus routes in close proximity to the site and the proposed ferry terminal in the center of the project site, the actual transit usage will likely exceed the current percentages.

COMMENT F-39 (Transportation):
While the overall intersection Level of Service may be acceptable, several intersection movements (e.g. Bridge Street/Continental Place-Pratt Boulevard PM and Saturday eastbound left turns; Herb Hill Road Charles Street PM and Saturday eastbound left turns, Glen Cove Road-Northern Boulevard PM northbound throughs) indicate LOS decreases between No-Action and Action scenarios without mention in the "Expected Traffic Impacts" discussion. The LOS changes should be discussed, and either explained as to why they do not require mitigation or have mitigation proposed.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-39 (Transportation):
For the majority of the study intersections, the overall intersection LOS, as well as the LOS for the individual lane groups and movements does not change from the future No-Build to the future Build condition. Furthermore, the analysis results reveal that many of the intersections and individual movements will experience future Levels of Service of C or better which is generally considered satisfactory without the need for mitigation. One exception is the intersection of Northern Boulevard and Glen Cove Road, as discussed in Response F-1. The following are other exceptions where the LOS changes below LOS C:

AM Peak Period
Glen Cove Avenue at Glen Head Road – The overall intersection delay increases by only 1.4 seconds and the intersection LOS remains at C. However, the southbound left turn movement goes from LOS C to LOS D due to an increase in delay time of just over 7 seconds. As shown in the mitigation tables in Appendix U, it is possible to mitigate the increase in delay time for this left turn movement to within 2 to 3 seconds of the No-Build condition by optimizing the signal timing.

Glen Cove Road at the Route 107 split – This intersection experiences a decrease in the intersection LOS from C to D and a substantial increase in delay time for the southbound left turn. The analysis results show that the proposed mitigation, which is essentially a reallocation of signal timing, will restore the overall intersection LOS to C and eliminate the lengthy delay time for the southbound left turn.

Glen Cove Road at Glen Head Road – The southbound through/right movement decreases from LOS C to LOS D due to a 12.1 second increase in delay time. Several of the movements at this location are currently operating at LOS F and will continue to do so under future conditions without mitigation. However, the overall intersection LOS remains the same with only a 5.7 second increase in delay time. The proposed mitigation will eliminate the LOS F from all movements. Furthermore, although the southbound through/right will still be at LOS D, the overall intersection LOS and delay time will be slightly better than the existing conditions.

Route 107 at Glen Head Road – The eastbound movement at this location operates at LOS E under existing and future No-Build conditions, but goes to LOS F under future Build conditions. The proposed mitigation will reduce the delay time for the eastbound movement to within approximately 10 seconds of the No-Build condition, but it will continue to operate at LOS F.

Glen Cove Road at Back Road/Mary Lane – The southbound through movement at this location goes from LOS C to LOS D due to a 10.5 second increase in delay time. However, , the number of site generated trips added to this intersection is relatively low and LOS D for individual movements during peak hours is not an uncommon occurrence. Since the overall intersection LOS remains at C with only a 4.5 second increase in delay time, no mitigation is proposed.

Charles Street at Herb Hill Road – The northbound and southbound left turns at this location will go from LOS B to LOS C, while the overall intersection LOS will remain at C with a negligible increase in delay time under the Proposed Action. Since this intersection is one of the key entry points into the project area, these impacts are not considered significant.

Bryant Avenue at Witte Lane – The southbound left turn goes from LOS C to LOS E due to a 30.5 second increase in delay time and the overall intersection goes from LOS C to LOS D due to a 7.4 second increase in delay time. Due to geometric constraints, the only possible mitigation at this location is optimization of signal timing. By reallocating some green time to the southbound left turn, the delay for this movement can be reduced by approximately 10 seconds as shown under the mitigation scenario in Table T-10A. However, as indicated, this adversely impacts the northbound through movement. Since the volumes for these two movements are of similar magnitude, this mitigation scenario represents a more equitable distribution of green time with negligible change in overall intersection delay.

Northern Boulevard at Glen Cove Road – While the proposed timing mitigation adversely impacts the delay time and LOS for some isolated lane groups, it results in substantial benefit in terms of reductions in delay time for the higher volume movements and a reduction in total intersection delay of approximately 8 seconds.

PM Peak Period

Brewster Street at Herb Hill Road/Mill Hill – The eastbound left turn at this location goes from LOS C to LOS D due to a 5.2 second increase in delay time. However the overall intersection LOS remains at A with average delays of less than 10 seconds. Base on this, the impact is not considered significant and no mitigation is proposed. However, upon completion of the subject project and other development projects in the immediate area, the signal timing parameters should be reviewed and minor adjustments made as deemed appropriate by NCDPW.

Glen Cove Avenue at Glen Head Road – Although the overall intersection delay increases by only 6.3 seconds and the intersection LOS remains at C, the southbound left turn movement goes from LOS E to LOS F and the delay time almost doubles. However, as shown in the mitigation tables in Appendix U, it is possible to effectively mitigate this impact by optimizing the signal timing. The timing optimization will result in slightly higher delays for the eastbound and westbound movements, but the overall intersection delay time is reduced and the intersection will operate at an acceptable LOS C.

Glen Cove Road at the Route 107 split – The southbound left turn movement goes from LOS E to LOS F with a substantial increase in delay time. However, as the analysis results indicate, this impact can be effectively mitigated by reallocating the signal timing. This intersection will operate at overall LOS C with or without any adjustments to the signal timing.

Glen Cove Road at Glen Head Road – Although the overall intersection LOS does not change, several of the individual movements experience decreases in LOS from C to D and from E to F. The proposed mitigation will eliminate the LOS F from all movements and the resulting intersection LOS and delay time will be almost identical to the existing conditions.

Charles Street at Herb Hill Road – Although some of the individual movements at this location will go from LOS B to LOS C, the overall intersection LOS will remain at B with virtually no change in delay time. The mitigation results represent an increase in cycle length which may be necessitated for coordination purposes if a traffic signal is installed at the Herb Hill Road/Garvies Point Road/ Dickson Avenue intersection. As can be seen, this will cause a decrease in LOS and increase in delay time for westbound traffic, but the westbound volumes are relatively light, so the impact is not considered significant.

Northern Boulevard at Glen Cove Road – As with the AM peak hour results, the proposed timing mitigation adversely impacts the delay time and LOS for some isolated lane groups. However, there is a benefit in terms of significant reductions in delay time for the higher volume eastbound through movement and a reduction in total intersection delay time of almost 20 seconds.

Saturday Peak Period

Brewster Street at Herb Hill Road/Mill Hill – The eastbound left turn at this location goes from LOS C to LOS D due to a 5.9 second increase in delay time. However the overall intersection LOS remains at A with average delays of less than 10 seconds. Based on this, the impact is not considered significant and no mitigation is proposed. As suggested for the afternoon peak, upon completion of the subject project and other development projects in the immediate area, the

signal timing parameters should be reviewed and minor adjustments made as deemed appropriate by NCDPW.

Glen Cove Avenue at Glen Head Road – Although the overall intersection delay increases by less than 7 seconds and the intersection LOS remains at C, the southbound left turn movement goes from LOS E to LOS F and the delay time almost doubles. However, as shown in the mitigation tables in Appendix U, it is possible to effectively mitigate this condition by optimizing the signal timing. As with the PM results, the timing optimization will result in slightly higher delays for the eastbound and westbound movements, but the overall intersection delay time is reduced and the intersection will operate at an acceptable LOS C.

Glen Cove Road at Glen Head Road – The southbound through/right movement decreases from LOS D to LOS E due to a 24.2 second increase in delay time and the overall intersection also goes from LOS D to LOS E with an increase in delay time of 10.5 seconds. Also, the northbound left turn at this location will operate at LOS F under future conditions without mitigation. The proposed mitigation will eliminate the LOS F for the northbound left turn and restore the overall intersection LOS to D with a decrease in delay time below that of the No-Build condition.

Glen Cove Road at Back Road/Mary Lane – The southbound left turn movement goes from LOS C to LOS D due to a 9.5 second increase in delay time. However, the number of site generated trips added to this intersection is relatively low and LOS D for individual movements during peak hours is not an uncommon occurrence. Since the overall intersection LOS remains at C with only a 1.4 second increase in delay time, no mitigation is proposed.

Northern Boulevard at Glen Cove Road – As with the AM and PM peak hour results, the proposed timing mitigation adversely impacts the delay time and LOS for some isolated lane groups. However, there is a benefit in terms of reduction in delay time for some of the higher volume movements and a reduction in total intersection delay time of almost 20 seconds.

In general, the impacts described above are unavoidable and are relatively minor in nature when viewed in the context of a project that has been designated a project of regional significance.

COMMENT F-40 (Transportation):
The section that discusses Prospect Avenue potential study intersections notes a traffic safety study commissioned along Prospect Avenue. That study indicates this route as an accident-prone area – only partly due to the low average daily traffic volumes. The sentence, "Field observations clearly indicate that these intersections can accommodate the additional site-related traffic without any adverse impact on operations" should be modified, in light of the need to indicate that additional site-related traffic will not have an impact in regards to operational safety.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-40 (Transportation):
See Responses F-6 and F-7. As noted, the number of site generated vehicles that will be added to Prospect Avenue is not expected to adversely impact the operational safety of this roadway.

COMMENT F-41 (Transportation):
Route 25A and Route 107 -An assumption of a 3:1 split was made of through traffic in relation to traffic turning to/from the east. Provide evidence that this assumption is valid (e.g. with peak hour counts).

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-41 (Transportation):
Manual turning movement counts were performed at the intersection of Route 25A and Route 107 at 15-minute intervals on Thursday, April 23, 2009 during the morning (7:00 to 9:00 AM) and evening (4:00 to 6:00 PM) peak periods. These counts are included in Appendix T-2. As can be seen from the turning movement counts, the split of through traffic in relation to traffic turning to/from the east ranges from 2.7:1 to 4.2:1. Based on this, we believe that the assumption of a 3:1 split of through traffic in relation to traffic turning to/from the east is reasonable and the discussion of the project related impacts at this intersection in the DEIS is valid.

COMMENT F-42 (Transportation):
The section discussing "Potential Effects on Diversion Routes" includes significant verbiage about the relative travel times along the Shore Road route. The actual travel run times should be included in a tabular format, to allow a true comparison.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-42 (Transportation):
The actual travel time route diagrams and data sheets are attached in Appendix T-11.

COMMENT F-43 (Transportation):
At the intersection of Garvies Point Road/Herb Hill Road, as will be discussed in the Civil Engineering comments, the Applicant should detail the extent of required right of way acquisition involved in a potential "roundabout as mitigation" scenario. Although we agree that formal design cannot be determined at this time, a schematic should be prepared with a minimal-per-FHWA sized roundabout island (i.e., an 80-foot inscribed circle diameter with one circulating lane).

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-43 (Transportation):
The revised site plan depicts a conceptual roundabout and provides a general indication of how said roundabout will be incorporated into the overall site design. The City of Glen Cove has retained a consultant to design improvements to Garvies Point Road and Herb Hill Road in connection with improving access to the new ferry terminal and it is our understanding that the City's roadway design project will consider incorporating a roundabout at this intersection. The

roundabout will be designed as a single lane roundabout in accordance with FHWA, Federal MUTCD and New York State MUTCD Supplement standards, including appropriate signs and pavement markings.

COMMENT F-44 (Transportation):
At the intersection of Garvies Point Road/Herb Hill Road, the potential signalized mitigation alternative indicates an 80-second signal cycle. This is much longer than the natural cycle length, and incompatible with coordination with the adjacent signal (less than ¼ mile to the east) at Herb Hill Road/Charles Street, which has an 88-second cycle. Final determination will be up to the City of Glen Cove Department of Public Works, but the DEIS should make it possible for these two adjacent signals to be coordinated.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-44 (Transportation):
As indicated in Response 43 above, the Applicant has determined that a roundabout is the preferable option and the traffic signal is no longer under consideration. Therefore, the cycle length for Herb Hill Road/ Charles Street intersection can be optimized independently.

COMMENT F-45 (Transportation):
Appendix L-7, Trip Generation, has a discrepancy for the trip calculations for 50,000 s.f. Office (Land Use Code 710) on the Glen Isle and the MW-3 Buildout pages. The Glen Isle trip calculation correctly uses the fitted curve equations. The MW-3 Buildout trip calculation incorrectly uses rates to come up with results which are approximately thirty (30) percent smaller than they should be. Appendix L-7 also has a discrepancy with the Transit Credit taken for the residential units: 7 percent for the Glen Isle trips, but only 5 percent for the MW-3 Buildout. The MW-3 Buildout trip calculations should be revised.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-45 (Transportation):
The trip generation calculations for the MW-3 Build-out scenario have been revised as shown in Appendix T-5.

COMMENT F-46 (Transportation):
Page III.F-80, LIRR Impacts, should repeat the statement that "the applicant's proposed direct shuttle service to the nearby LIRR station(s) has the potential to fully mitigate any project impacts on LIRR parking conditions" for consistency within the document.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-46 (Transportation):
Comment noted. The Applicant's proposed direct shuttle service to the nearby LIRR station(s) has the potential to fully mitigate any project impacts on LIRR parking conditions.

COMMENT F-47 (Transportation):
Parking
The Parking Study (Appendix L2) is dated February 2009. Between April and May 2009, our office made multiple comments on this study which required various changes. If those comments were addressed in this June 2009 DEIS, the Parking Study title should be updated, or a revision date added.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-47 (Transportation):
The earlier comments primarily requested supplemental information which was provided in the report. See Responses F-48 to F-57 for additional clarification of parking issues.

COMMENT F-48 (Transportation):
The cited article on page 5, "Parking Requirements for Health Clubs," was taken from a publication called *The Parking Professional,* which is not a standard traffic engineering reference in New York State. Moreover, the standard reference, the Institute of Transportation Engineers (ITE) *Parking Generation* manual (3rd Edition), has data for health club parking, so the cited article in the DEIS is in direct conflict with the national ITE standard. It is therefore an inappropriate source. The article, though written in 2004, cites the out-of-date 1987 2nd Edition of the ITE *Parking Generation* manual.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-48 (Transportation):
The footnote is a direct quote from Urban Land Institute's *Shared Parking* 2nd Edition's tables. This data is still the best available data as ULI *Shared Parking* 2nd Edition was written after *Parking Generation* 3rd Edition and used its information where applicable.

The reference to the *Parking Professional* article was removed in the updated Shared Parking Analysis dated 8/7/09 previously provided because it was somewhat confusing. The work consulted in the development of the parking model was Urban Land Institute's *Shared Parking*, 2nd Edition dated 2005, which is the methodology specified in the Final Scope for the DEIS (p. 19). A 1995 report by the ITE Technical Council Committee 6F-52 *Shared Parking Planning Guidelines* concluded that the ULI *Shared Parking* methodology from the first edition in 1983 was the best approach, but the default values and recommendations needed to be updated, which is exactly the goal of the Second Edition.

One of the prime tasks of the *Shared Parking* team was to evaluate the latest data in ITE's *Parking Generation* 3rd Edition (published one year before *Shared Parking*) and recommend parking ratios based on it, if the data was deemed reasonably reliable. Randy McCourt, who

assembled the *Parking Generation* data base, worked with the *Shared Parking* team to understand the data. It is important to note that *Parking Generation* is simply a compilation of data points that may or may not have been collected on a design day. At an early brainstorming meeting regarding issues to be addressed in the new *Shared* Parking, it was determined that the data for health and fitness clubs in *Parking Generation* was not very reliable (standard deviation of 2.43 and coefficient of variation 47%), and yet the land use was increasingly an issue for mixed use developments. Another concern with the data in *Parking Generation* was that of the 15 studies cited (comprising 20 peak hour data points), only one is less than 10 years old, and 11 of the 15 are over 20 years old. Walker Parking Consultants then undertook a focused study of health club parking demand by conducting a survey of clubs in Indianapolis to identify the design hour, which was 6:00 pm on a weekday evening in January. Data was collected at 16 health clubs at that hour on a peak day in January. Given the age of ITE's data and the reliability, the *Shared Parking* team deemed the WPC study data, published in the *Parking Professional* article to be more reliable. The applicant used the ratio recommended by the ULI manual, which is the industry standard for projecting parking in mixed-use developments.

COMMENT F-49 (Transportation):
Likewise, the cited article on page 5, "Hotel Parking: How Much Is Enough?" is from an Urban Land Institute (ULI) publication. However, it is in direct conflict with the national ITE standard, *Parking Generation,* 3rd Edition, which has its own data for hotel parking. The cited article is more than 20 years old (from 1988) and cites just one study. It is therefore an inappropriate source.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-49 (Transportation):
See Response F-48. The study is not using non-standard data. The study uses the recommended ratios from Urban Land Institute's *Shared Parking*, which is recognized as the leading source for planning parking in a mixed-use environment and is the methodology called for in the DEIS Scope of Work for this project. As previously noted, the *Shared Parking* team evaluated the *Parking Generation* data as the first step in the process. They had concern about the data for hotels because *Parking Generation* breaks hotels into five categories, and further only evaluates the data based on a single variable: rooms. As a result, the data for "Hotel (310)" has a coefficient of variation of 39% and a standard deviation of 39% for a data sample that includes 14 points. It should be noted that the majority of ITE's data is as old is the data in the 1988 Urban Land article study (only four of the 14 studies were from 1990 or later) and that for three of the five categories (notably business hotels, all suite hotels and resorts), only two or three sites were studied. While the motel data is seemingly more reliable, every single data point in that data set is older than the 1988 study.

Further, as noted by the "peak period" information, some hotels in the 310 category exhibited peaks at mid-day, others early evening and yet others over night. A review of the data by Randy McCourt indicated that many of the studies were only conducted at those times, so it was possible that the peak hour was not even captured in the data reported to *Parking Generation*. Further, the hotels in the data set had markedly different amounts of restaurant and meeting

space. The 1988 article is cited in *Shared Parking* for two reasons. First, it argued that it was inappropriate to attempt to size hotel parking solely based on the number of rooms, and that instead the projection should be separated into hotel room, meeting, banquet and restaurant lounge categories. The second reason was that it is the only known published information on captive ratios and the effect of shuttle bus service on parking needs at hotels. The *Shared Parking* team agreed that it is important to separate meeting/conference and restaurant/lounge space from rooms in the parking projections, and then developed recommended ratios for hotels that were tested against the data points in all five categories of hotels in *Parking Generation.* Thus ITE's data is neither more updated nor more comprehensive than the article that was published in Urban Land, and the *Shared Parking* team used both sources to create the fullest data analysis available.

COMMENT F-50 (Transportation):
It is inappropriate to use "assumptions" which reduce on-site parking needs by upwards of 50 percent depending on the land use. The ULI *Shared Parking* manual should have been used instead. Moreover, the expansive size of the Glen Isle property makes it inappropriate to rely heavily on a non-captive ratio (where parking demand is reduced by a factor for residents using on-site amenities), even on a per-block basis. A resident who goes to another amenity within Glen Isle may indeed only need one parking space at a time, but will still need a parking space convenient to each individual amenity while that amenity is being used. Only when separate on-site uses are close together (for example, in a single strip shopping center) is it appropriate to project the same parking space serving users of multiple on-site land uses. The captive ratio needs to be eliminated from the calculation or significantly reduced.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-50 (Transportation):
The ULI Shared Parking manual was used in considering captive reductions. The manual does not provide adjustment percentages the way it does with hourly presence factors, because captive adjustments are too site dependent. The manual notes that, "Determining appropriate noncaptive factors is the step that requires the greatest professional judgment and experience…." (p. 29) and suggests evaluating the relative sizes of the land uses on a site to determine an appropriate adjustment. This approach was utilized to arrive at the adjustments shown in the report.

It is acknowledged that walking distances impact the captive effect, therefore large captive adjustments have not been used, except in two cases. The hotel has significant reductions for the ancillary uses like the on-site restaurant and the meeting space. These venues are typically utilized in large part by hotel guests. *Shared Parking* suggests significant reductions are in order at hotels and provides data to support the percentages used. A significant reduction is also applied for the parks, as they would be expected to be used as much by residents and others already on site as by people coming to the site specifically to visit the parks. The other captive adjustments are ten percent or less, which amounts to reductions of between two and eight spaces for the retail, restaurant and marina. Given the number of residences nearby, these reductions are conservative.

The captive adjustments were based on the methodology outlined in *Shared Parking* for evaluating the relative demand generation of land uses on the site that generate captive markets and those that benefit from captive markets. With hundreds of cars generated by residences, offices and hotels, captive adjustments of 10% of retail and restaurant demand (in both cases amounting to a reduction of ten or less cars) is justified, as is the 49-car reduction taken for the park. For the hotel, the reductions for both driving and non-captive ratios are recommended in *Shared Parking* as the "Recommended Default Values" in Table 4-17 (note that the study did not include restaurant space in the hotel). In addition, neutral contacts in the hospitality industry were interviewed and similar answers were received regarding transportation to hotels and captive effects between guest rooms and function space.

COMMENT F-51:
The hourly and seasonal "presence" charts have no supporting data or citation. Sources for these variations must be provided. If no source can be provided, the charts can not be used.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-51:
Urban Land Institute's Shared Parking is the source of all hourly and seasonal adjustment factors. The parking report has been updated to include this citation.

COMMENT F-52 (Transportation):
The peak hour adjustments for various uses have no supporting data or citation. Sources for these percentages must be provided.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-52 (Transportation):
Urban Land Institute's Shared Parking is the source of all hourly and seasonal adjustment factors. The peak hour cited in these tables is the result of the shared parking calculation. The report has been updated to include the ULI citation.

COMMENT F-53 (Transportation):
The study incorrectly calculates the parking code requirements for professional offices. The Code says to use "1 space per 200 square feet of space (exclusive of bulk storage, common area or utility areas)" whereas the study bases parking on the Gross Floor Area (which includes all space).

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-53 (Transportation):
Comment noted. The calculations have been modified to to exclude common, utility and storage areas.

COMMENT F-54 (Transportation):
Because the 5,000 s.f. restaurant is proposed to use valet parking, and has no adjacent parking spaces, the Parking Analysis should include a restaurant valet queuing analysis to ensure appropriate storage is available within the adjacent circular path.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-54 (Transportation):
The length of the circular path has been compared to the number of cars projected to arrive at and depart from the restaurant during the peak hour (per ITE's *Trip Generation, 8th Edition*) and is projected to be adequate to meet the traffic flow during busy times. Anticipated arrival rate is expected to be less than one vehicle per minute and there is room for approximately four vehicles at the drop-off adjacent to the restaurant. The actual number of queued vehicles is a function of the number of valet parkers. For the most part, only restaurant traffic is expected to use this access road. Therefore, even if the queue extends beyond the circle on rare occasions, it will not impact anyone other than restaurant patrons.

The calculation shown below is for both Quality and High Turnover restaurants. In both instances, it is expected that an average of about one car will arrive or depart per minute; in an above-average period there may be several vehicles at once. It is anticipated that there will be a sufficient number of valet attendants on duty to prevent back-ups and delays at the restaurant entrance. Additionally, as indicated on the revised site plan, the turnaround at the restaurant entrance has been widened to provide sufficient stacking room for the valet attendants to move cars out of the porte-cochère quickly during peak periods. An AutoTURN figure is provided in the Shared Parking Analysis report in Appendix I.

Restaurant Type	Trip Generation (Saturday Peak Hour)	Enter/ Exit	Restaurant Sq. Ft.	Peak-Hour Trips	Avg. Trips per Minute	Porte-Cochere Capacity
"Quality" (931)	10.82 trips/ 1,000 sf	59%/ 41%	5,000	54.1	0.90	4-6
"High Turnover Sit-Down" (932)	14.07 trips/ 1,000 sf	53%/ 47%	5,000	70.4	1.17	4-6

Source: ITE Parking Generation, 8th Edition.

COMMENT F-55 (Transportation):
The note that "Current zoning does not have a parking requirement for such a use" is incorrect for park, recreational space, and for loading zones. As per the City's ordinance §280-73.2(I), the required parking for "Other Uses" is, "As deemed necessary by the Planning Board." Accordingly, the requirement should only say "zero" or "NA" if the Planning Board deems this appropriate.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-55 (Transportation):
Comment noted. The parking study has been revised to reflect the note. The following table summarizes code required number of loading berths. Berths must be 10' x 30' by 14' high. It is

noted that the code for MW-3 includes only retail/industry and office categories. Therefore, the code for hotel, residential and marina areas has not been calculated. This table has been incorporated into the report in Appendix I.

Block		Quantity	Unit	Requirement [1]	Loading Required	Comment	Loading Provided
West Parcel:							
A	Restaurant	5,000	sf GFA	1 per 25,000 sf of bldg area or fraction thereof	1		1**
C	Hotel	250	rooms	Non-retail/industry, non-office uses per Planning Board	1	1 minimum	
C	Catering	7,182	sf GFA	Non-retail/industry, non-office uses per Planning Board		with hotel	
C	Conference Center	7,200	sf GFA	Non-retail/industry, non-office uses per Planning Board	1	1 minimum	
C	Retail	5,300	sf GFA	1 per 25,000 sf of bldg area or fraction thereof	1		
C	Restaurant/Lounge	4,000	sf GFA	1 per 25,000 sf of bldg area or fraction thereof			
C	Spa	18,000	sf GFA	Non-retail/industry, non-office uses per Planning Board		with retail	
Total - Block C*					3		3
East Parcel:							
D	Office	50,000	sf GFA	1 per 50,000 sf of bldg area or fraction thereof	1		2
J	Retail	20,000	sf GFA	1 per 25,000 sf of bldg area or fraction thereof	1		1**
Marina/Park:							
Marina Slips**		85	slips	Non-retail/industry, non-office uses per Planning Board			0
Park/Rec Space**		19.4	acres	Non-retail/industry, non-office uses per Planning Board			0

*Block C totals are incomplete until the City Planning Board establishes a specific requirements for non-retail, non-office land uses.
**Street loading

Source: Town of Glen Cove (NY) Zoning: Chapter 280-73.2, MW-3 [Marine Waterfront 3 District, Walker Parking Consultants.

COMMENT F-56 (Transportation):
The Parking Study should analyze the adequacy of loading spaces, especially for the marina section.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-56 (Transportation):
The vehicle turns for the traffic circle at the boat launch and adjacent parking have been checked using AutoTurn. See Exhibits II.PD-1 to II.PD-4. See Response F-55.

COMMENT F-57 (Transportation):
The West Parcel Parking Supply (page 25) lists 1,911 parking spaces on the West Parcel. According to Table II-3, these 1,911 parking spaces include 79 parking spaces associated with the 5,000 s.f. restaurant. The C-20 parking layout plan does not indicate any parking adjacent to the restaurant. The discrepancy should be explained.

Alan J. King, Jr., P.E., LEED AP, partner, Cameron Engineering & Associates, LLP, letter dated July 20, 2009.

RESPONSE F-57 (Transportation):
The parking for the restaurant is not directly adjacent to the building, but is located in the parking facility for Block A. This parking is within a few hundred feet of the restaurant – a level of

service "A" according to criteria for evaluating walking distances. Although valet parking is anticipated, the site plan for this phase will incorporate appropriate wayfinding signage to direct restaurant patrons who do not wish to utilize the valet service to the appropriate parking area. The revised parking study in Appendix I outlines the need for signage to enable the shared parking approach to site-wide parking to function properly. The report also discusses the use of valet service at the restaurant to make efficient use of nearby resources.

COMMENT F-58 (Transportation):
The DEIS says that there will be enough new parking spaces created for more than 3,200 cars, yet the traffic impacts are expected to be "negligible". This simply defies logic. While numerous intersections were studied, many were omitted that might paint a more realistic picture of the impact of all this traffic on North Shore residents. For example, anyone driving through the streets intersecting with Glen Cove Avenue, in Glen Cove, Sea Cliff and Glen Head will find it difficult to enter Glen Cove Avenue to make a left turn, unless they are at an intersection with a traffic light. Wait times are already significant, and there is a steady stream of traffic all day long. This occurs on the entire length of Glen Cove Ave. from Glen Cove to the Greenvale train station. Since this route is a local road as well as a back road to points west of Glen Cove, it will surely experience much heavier traffic after buildout. Exiting Robinson Ave. onto Glen Cove Ave. is currently very difficult, whether you are turning left or right as visibility of oncoming traffic from Back Rd. Hill is poor. This comer needs further study for safety related issues, at the very minimum.

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

RESPONSE F-58 (Transportation):
There is not a direct correlation between the number of parking spaces and the trip generation characteristics of a development. Figures F-10, F-11 and F-12 in Appendix T-6 depict the anticipated site generated traffic on Glen Cove Avenue during peak hours. This amount of added traffic is not expected to significantly impact existing side street delay times or operational safety at unsignalized intersections along Glen Cove Avenue.

COMMENT F-59 (Transportation):
The already failing intersection of Glen Cove Rd. and Northern Blvd., will retain its failing grade after build-out, according to the DEIS, even with mitigation of adding a third through lane on the southbound approach. While efforts may be made to improve flow through this intersection, the sheer volume of cars will be the same nonetheless, and choke points will surely occur at other places, such as further south on Glen Cove Rd. in East Hills and Carle Place, or further west in Roslyn, and Manhasset, which already have their share of traffic jams - again reducing quality of life for North Shore residents who are forced to travel these routes.

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

The traffic mitigation measures include widening Glen Cove Road at different sections. It is not clear how this proposal will solve traffic problems without creating bottleneck problems in other areas.

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

RESPONSE F-59 (Transportation):
Increased traffic and congestion on Long Island's major highways will take place with or without the proposed action.The number of cars that will be added to the intersection of Northern Boulevard at Glen Cove Road as a result of the proposed action is not significant when taken in the context of existing traffic traversing this intersection. Observations during the course of the traffic study revealed that this intersection is clearly the critical location along the entire length of Glen Cove Road between the City of Glen Cove and the Long Island Expressway. While this intersection operates at poor levels of service during the peak hours, the analysis results indicate that the actual impacts of the project generated traffic will be minimal, even without any mitigation. In fact, if the site is developed with industrial uses as currently permitted by the zoning, the possibility exists that the traffic impacts would be even greater.

It should also be noted that the updated analysis results indicate that many of the project related impacts at the Glen Cove Road/Northern Boulevard intersection can be readily mitigated by adjustments to the signal timing. Furthermore, if Nassau County proceeds with its plans for widening the south leg of the intersection, the results indicate that it may be feasible to reduce future operating delays below existing levels. If the County does not proceed with their planned improvements and/or the New York State DOT is not agreeable to revising the signal timing, the project related impacts at this intersection would be unavoidable impacts associated with implementation of a project of regional significance. The congestion at this intersection is due to the high volumes on both Northern Boulevard and Glen Cove Road and the widening of Glen Cove Road to alleviate conditions at this location will not create bottleneck problems at other locations. See Responses F-85 and F-86 for additional discussion of potential widenings at Glen Cove Road intersections.

COMMENT F-60 (Transportation):
The DEIS says that the intersection of Cottage Row/Brewster St. has a "B" and "C" rating on a scale of A-F with A being the best and F being the worst. Anyone who traverses this route on a daily basis knows that this is a problem intersection and cannot be considered average or above in level of service. This is a heavily trafficked intersection which needs a dramatic overhaul including left turn arrows on all four sides in order to make it safer and more manageable. On morning rush hours during road work near the firehouse, exiting the Landing neighborhood via this (and other routes) was a nightmare. One can only assume this will be the case during construction and roadwork at the RXR Glen Isle site, especially at the easternmost portions of the development.

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

RESPONSE F-60 (Transportation):
The analysis results, as well as visual observations do not substantiate this comment. However, it is acknowledged that neighborhood traffic patterns during the major reconstruction of the Brewster Street/Glen Cove Avenue/Pratt Boulevard/Charles Street intersection were

substantially disrupted and impacted operations at the Cottage Row/ Brewster Street/School Street location. However, since that roadway project is now complete and the improved Glen Cove Avenue Avenue/Pratt Boulevard/Charles Street intersection provides direct access to the project site, there is no apparent reason for site related construction traffic to utilize the other local streets surrounding the site.

COMMENT F-61 (Transportation):
Traffic near the project site at Garvies Pt./Herb Hill Rd/Dickson St. intersection will be reduced from an A/B level of service to F (failing) in their estimation, yet the simple installation of a roundabout or traffic light will effectively mitigate this impact. This seems like an overly simplistic and inadequate mitigation to an enormous volume of vehicles which are expected to travel here.

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

RESPONSE F-61 (Transportation):
The Garvies Point Road/Herb Hill Road/Dickson Street intersection is in the center of the project and will obviously be one of the most impacted intersections. The existing stop control cannot be expected to accommodate the site generated traffic without modification. The revised site plan which is now part of the new Proposed Action depicts a roundabout which is the preferred intersection configuration. As indicated in Response 43 above, City's roadway design project for Garvies Point Road and Herb Hill Road will incorporate a roundabout at this intersection and the developer's site engineer will be coordinating the site design with the City's roadway design.

The operation of the roundabout based on future traffic conditions has been analyzed using SIDRA software and the results indicate that roundabout can readily accommodate future traffic volumes, including site related traffic and ferry traffic. Also, the roundabout is expected to improve safety since it reduces the number of potential conflict points as compared to a traditional intersection.

COMMENT F-62 (Transportation):
Another impact of the added traffic is on the cut-through streets. Some were studied, but not nearly all. Crescent Beach Rd. is a cut-through for area residents to reach the High School, YMCA, local beaches, golf course, private schools and other destinations. Woolsey Ave. and Roosevelt St. also serve as cut-throughs. This can only increase as the 6,900 full-time equivalent construction workers from the site travel to and from the site to their homes or businesses in the area, not to mention the residents of the project and the other staff who will work there when construction is complete. While reports may not delineate any significant impacts, to those who live and travel these routes, quality of life and safety will be adversely affected by the added cars cutting through.

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

RESPONSE F-62 (Transportation):
While there is always the potential for spillover from any development onto local streets, this is expected to be minimal. Based on a review of an area map, it is unlikely that site traffic will utilize Crescent Beach Road, Woolsey Avenue or Roosevelt Street unless they have a specific destination in the immediate area.

In regard to construction workers, construction schedules generally begin around 7:00 a.m. which is well before the normal morning peak and end before 4:00 p.m. which is also prior to the heaviest afternoon/evening peak hour on the local roadways. The construction workers are expected to utilize the major access routes at these times.

COMMENT F-63 (Transportation):
Other intersections studied near the project site, including those in the residential areas north of the site, will not be significantly impacted according to the DEIS. This is overly optimistic as these streets are currently serving as a cut-through for various reasons including avoiding the traffic light on. Landing Rd./Ellwood St., and will have an increase in cut-through traffic during and after construction, as they did during the environmental remediation of the waterfront.

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

RESPONSE F-63 (Transportation):
See Responses F-60 and F-62.

COMMENT F-64 (Transportation):
The parking lot behind the post office is currently used as a cut-through roadway to and from the Landing area and also to and from Brewster St. to avoid the intersection in front of the firehouse. At any time of day or night, you will find through traffic here. Was this extra non-parking related traffic counted in the traffic studies of the nearby intersections? What steps will be taken to mitigate the extra traffic through here to protect the safety of those who walk and park in this lot?

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

RESPONSE F-64 (Transportation):
The turning movement counts used in the analyses, provided in Appendix T-2, included activity in and out of the driveway opposite Herb Hill Road. It is not possible to predict how much site related traffic might utilize this parking lot as a cut-through route, but if necessary, traffic calming measures such as speed humps can be introduced to slow traffic.

COMMENT F-65 (Transportation):
Regarding the intersection of Glen Cove Rd./Bridge St./Continental Place westbound approach turning left here is very difficult now and can only get far worse when the 3,256 cars from the waterfront are coming and going. The traffic study didn't think it worthy of mitigation, but those who travel this route believe it needs a left turning arrow to enter Continental Place safely.

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

RESPONSE F-65 (Transportation):
It is incorrect to equate the number of parking spaces to trip generation. The capacity analysis results reveal that the intersection of Pratt Boulevard/Bridge Street/Continental Place will operate at an acceptable Level of Service during all analysis periods upon completion of the proposed action. Furthermore, neither the capacity analysis results nor the accident data indicate that there is a need for a left turn arrow on any of the intersection approaches.

COMMENT F-66:
Too many people, too many cars. Already our tiny town lacks enough parking for its library and post office. We commuters are running out of space at the train stations. On Saturdays it's hard to find parking even at our supermarkets. And the city wants to bring in thousands of additional car owners?

Lynne Normandia, email dated July 16, 2009.

RESPONSE F-66:
The proposed shuttle bus is intended to mitigate the impact on parking at the train stations and in the downtown shopping district by providing residents and visitors to the project site a viable alternative to using their private automobiles.

COMMENT F-67:
Transportation
As fellow residents of Long Islands North Shore, we all know one of the greatest burdens in front of us is traffic and safety. The DEIS fails to adequately address mitigation efforts in regard to infrastructure requirements for high density development such as proposed by RXR/Glen Isle.

1. *GLEN COVE ROAD AND NORTHERN BLVD.* - The analysis of the impact of this project on the intersection of Glen Cove Road and Northern Boulevard does not give sufficient importance to the LOS ratings in any of the scenarios reviewed in the DEIS. With No Future Action, the LOS is D. After the Proposed Action, it drops to F. The Mitigation Measure that is supposed to bring it back up to D is Nassau County's alleged future addition of a third through lane on the southbound approach. The report mentions that this will require the County obtain ROW from the businesses at the intersection but does not take into consideration what will happen if the County does not succeed in this endeavor. The analysis also fails to determine what this bottleneck condition will cause when cars pass through the intersection to the north side of Northern Blvd. and have to merge into two lanes.

Bruce Kennedy, Mayor, Village of Sea Cliff, letter dated July 17, 2009.

RESPONSE F-67:
See Responses F-1 and F-11 and F59.
The intersection configuration under future Build conditions is based on two northbound through lanes. Based on this configuration, there will not be any merge north of the intersection.

COMMENT F-68:
2. PROSPECT AVE. AND CARPENTER, PROSPECT AVE. AND CLIFF WAY, PROSPECT AVE. AND SEA CLIFF AVE. AND PROSPECT AVE. AND GLEN AVE.

In the last section of the Transportation chapter, the DEIS states that "The proposed development is designed to create a highly pedestrian-oriented neighborhood setting, which encourages walking and strolling both as an alternate means of transportation and as a recreational activity." Sea Cliff residents are strong supporters of pedestrian oriented neighborhoods and applaud this goal.

However, the analysis of these intersections does not take into account any concerns for pedestrians. They conclude that "In addition to a review of the existing traffic volume data (there were no independent LOS studies done on these intersections for the DEIS statement), field observations clearly indicate that these intersections can accommodate the additional site-related traffic without any adverse impact on operations. Existing and future volumes are such that changes to intersections delays, if any, would be imperceptible to the average driver."

All of these intersections are in quiet residential neighborhoods where walkers, joggers, bicyclists and children walk to the Villages parks and the beach. The Statement addresses the wrong question. The issue is not whether the roads can take more traffic or what the impact will be on drivers. The question that needs to be addressed is what impact this increased volume will have on Village residents who need to cross the street and who live on it. Prospect Ave. may have the capacity for more cars but it is a neighborhood street, not a highway.

Further, when the DEIS speaks to the current traffic count it states an unspecified "theoretical capacity" of Prospect/Albin. The document also states that Prospect/Albin is a shorter cut through route to the 25-A viaduct but then claims that the vehicle count will only increase by 20 - 37 vehicles per rush hour, which defies all logic. It is imperative that the FEIS take into consideration the facts that lower Prospect/Albin suffers from a limited pedestrian right of way with no street shoulders, curbs or sidewalks and has homes directly abutting the street. It should look at the geological integrity of steep slopes on which these homes are built and the potential structural effects/damage that could be caused by the vibration from increased traffic. All of Prospect Avenue has limited sight vision, numerous blind curves and many pedestrian crossing areas. Equally significant and of serious concern is that the DEIS while identifying intersections along Prospect/Albin it fails to provide a proper analysis of the inadequate sight distances for safe stopping.

Bruce Kennedy, Mayor, Village of Sea Cliff, letter dated July 17, 2009.

RESPONSE F-68:
Although Prospect Avenue/Albin Street is a residential street, as stated in the DEIS, it currently functions as a minor local collector route between Glen Cove and Route 25A. The overall trip distribution patterns and trip assignment parameters utilized in the DEIS were developed following several technical discussions with the Planning Board’s traffic engineering consultant as to the methodology and reasonableness of the assumptions. The trip distribution patterns are based on existing cordon counts, intersection turning movement counts and professional

judgment. The projections for peak hour site generated traffic on Prospect/Albin as contained in the DEIS are therefore realistic.

As stated in Response F-6, the applicant cannot be held responsible for existing substandard roadway conditions resulting from the natural terrain of the area. The concerns of the residents and the Village as to the safety of their street are understandable and acknowledged. However, in spite of the limited pavement width and poor roadway alignment, the accident records are not indicative of a serious safety problem. In fact, the Cameron study determined that the overall accident rate for the Prospect/Albin route is slightly below the New York State average rate for similar roadways. Furthermore, the limited number of vehicles that will be added to these roadways will not alter the current situation and will not contribute to an increase in the frequency or severity of accidents.

Several observations of traffic activity along Prospect Avenue/Albin Street were conducted by the Applicant's traffic engineer both before and after the installation of the speed humps and the additional stop signs. It appears that these measures have been effective in reducing vehicle speeds and enhancing safety. As stated in the DEIS, if residents continue to perceive traffic conditions to be unsafe, consideration may be given to implementing additional traffic calming solutions.

COMMENT F-69:
3. GLEN COVE AVENUE @ NORTH SHORE SCHOOLS - While the study of this major intersection is spoken of, it does not address the most important aspect of it; namely, it is the major crossing area of thousands of school age children every day. Furthermore, much of the vehicular traffic at this sensitive intersection comes from within the immediate area and never reaches Glen Head Road or Sea Cliff Avenue as it funnels from and back into the side streets.
Bruce Kennedy, Mayor, Village of Sea Cliff, letter dated July 17, 2009.

RESPONSE F-69:
The driveways to the North Shore High School and North Shore Middle School are controlled by a traffic signal with associated pedestrian signals. Also, during arrival and dismissal time, a crossing guard is present to facilitate the safe crossing of students. The discussion in the DEIS does acknowledge that there is substantial pedestrian activity at these times, in addition to significant school bus activity. However, as presented in the DEIS, the site generated traffic on Glen Cove Avenue during these times will amount to less than one vehicle per signal cycle which is not expected to result in any noticeable impact on this existing condition.

COMMENT F-70:
4. GLEN COVE AVENUE - Glen Cove Avenue is identified as a 4-lane highway but that statement is incorrect as it runs along the Sea Cliff / Glen Cove border as it is then a 2-lane road.
Bruce Kennedy, Mayor, Village of Sea Cliff, letter dated July 17, 2009.

RESPONSE F-70:
Comment noted. The description of Glen Cove Avenue as a 4-lane highway (2 lanes in each direction) applies only to the north section of the road in the immediate vicinity of the site. In the southbound direction, the two lanes extend from Pratt Boulevard to just beyond Altamont Avenue. In the northbound direction, the second lane begins just north of Craft Avenue.

COMMENT F-71:
I, like many others, am concerned about traffic problems that can arise from such a development and ask that the planning board pay careful attention to the possible ways of mitigating this problem. I think it is important that transportation be provided for people to go from the center of the city to the waterfront - and in the reverse direction as well - so that users of the ferry service can leave their cars at home and people living on the waterfront can have a means of getting to the train station without getting into cars. It will also be a boon to people who want to partake in the waterfront recreational programs that there be a way of accessing the waterfront by public transportation - a bus perhaps that shuttles between downtown Glen Cove, the train stations and perhaps NSUH-LIJ as well as extending to an area on Forest Avenue. This would mitigate the number of cars that will be using the roads to get to the waterfront. Garvies Point could also benefit from such a shuttle.

Jadwiga Brown, email dated July 18, 2009.

RESPONSE F-71:
The Applicant is proposing to provide a shuttle bus that will transport people between the site and nearby train stations and the downtown business district. The City also operates a commuter bus and a loop bus which runs adjacent to the site. In addition, Long Island Bus provides service which connects Glen Cove with key destination points throughout Nassau County.

COMMENT F-72:
This section has an exhaustive (and exhausting, for the reader) analysis of traffic at numerous key intersections affected by the project. Since time and space do not permit an equally exhaustive analysis on my part, my focus is on the key intersections where the project (served by a single, main 2-lane road) meets the primary thoroughfare around the downtown: Glen Cove Avenue - Brewster Street and the terminus of Route 107, in front of the firehouse. Obviously, it would be detrimental to the concept of this large development to do an analysis of the traffic impacts on surrounding neighborhoods north of the Creek and west of Brewster Street should the single route into the project be closed for an emergency. Nevertheless, an accident involving commercial trucks, cars, fire trucks and/or ambulances at the primary intersection or anywhere along this single access road to the project will cause traffic to be re-routed to local residential streets. This not-so-far-fetched scenario will impact the quality of life in these neighborhoods.

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

RESPONSE F-72:
There is always the possibility that an emergency will result in the closing of Garvies Point Road, but those that will be most impacted by such an occurrence are the future residents and visitors to the project site. Furthermore, such incidents are rare and are not typically analyzed as

part of the environmental review process. The same concerns would arise if any collector street (e.g. Landing Road) serving a particular geographic area has to be closed and traffic redirected. These types of impacts are unavoidable, but they are infrequent, isolated events that are not the result of any particular development.

COMMENT F-73:
Viewing these tables one is apt to suspect that something is not quite right when key intersections at the project access point are examined. This is reinforced by delay numbers that actually decline (even slightly) rather than increase from "No Action" to "Proposed Action". Is the gullible public asked to believe that if the project goes ahead, the average delay at the controlled intersection of Mill Hill and Brewster Street will actually be less in 2016 than if the project were not to be built? (See EB morning and evening Peak, thru-traffic and right-turn and WB, left-turn, right-turn, thru-traffic during the same period).

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

RESPONSE F-73:
At many of the locations, the Build analysis is based on modified signal timing which could actually result in improvements to the overall intersection operation and reduced delays. For clarification purposes, the revised tables in Appendix T-10 now depict the future Build conditions without any signal timing modifications in addition to the results with the timing adjustments. In a few instances, the analysis results may show a slight decrease in delay times when comparing future No-Build conditions to existing conditions. This is the result of the changes in the peak hour factor as discussed in Response F-30 above.

COMMENT F-74:
Everyone that exits Glen Cove at the intersection of Brewster Street and Route 107 in the morning is pretty certain that it will take longer to get through each of the lights that have to be negotiated. Using the tables presented in Section III.F, an analysis of 5 of the 9 controlled intersections that I pass through each weekday morning to reach Cedar Swamp Road in Glen Head shows a 48% increase in delay time at existing traffic signals - and this does not include the 4 signals at Ellwood St. and landing Rd., Town Path and Pratt Blvd., the merge at 107 and Glen Cove Rd. at the Glen Cove border, and the signal at the Glen Head condo development, because these intersections were not included in the DEIS transportation analysis. This also does not take into account a slower rate of travel due to increased volume.

The average delay due to the five signals for which data is available (excluding delays experienced at 4 other signals) is projected to increase from just over a minute and a half to over 3 minutes in a 3.5 mile trip from my home to the turn-off for Route 107 in Glen Head. By the "standards" used to conduct this analysis, the delay increases are "insignificant'. Taken cumulatively, they are significant to me. That's another couple of minutes of conversation with my wife in the morning or reading the paper. Remembering that this data represents average delay times, the actual time spent sitting at a traffic light can be quite a bit more for the Peak Hour commuter. Finally, as mitigation measures proposed in the DEIS, the developer proposes adding 4-way controlled signals at other minor intersections that are currently controlled by stop

signs or two-way signals at present. These recommendations suggest more significant traffic impacts than this document admits to, when taken cumulatively.

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

RESPONSE F-74:
The methodology used in the traffic impact study is the standard methodology used by municipalities and governmental agencies. The analysis procedures and results are meant to provide a general understanding of the impacts that project generated traffic will have on the roadways in the vicinity of the project. The average delay times provided in the LOS tables in the DEIS and the revised LOS tables in Appendices T-10 and U-2 herein are representative of peak hour conditions. Delays during off-peak hours will typically be substantially less. The results presented in the report are a reasonable representation of the probable project impacts.

COMMENT F-75:
c. Transportation
"The Proposed Action will generate additional traffic on roads" COMMENT: Who decides that the "Improvements... to mitigate... traffic impacts" are acceptable and not a further deterioration of the residents' quality of life?

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

RESPONSE F-75:
The Planning Board, acting as Lead Agency, is ultimately responsible to evaluate all of the potential environmental impacts and determine appropriate mitigation measures.

COMMENT F-76:
• A residential project of this magnitude should not be served by a single dead-end road. What this means is that traffic will seep into adjacent residential neighborhoods to avoid delays at major intersections on the western side of Glen Cove. This problem will NOT be helped by adding more traffic lights as the developer proposes.

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

RESPONSE F-76:
The analysis results do not substantiate the claim that the resultant delays will cause traffic to infiltrate into surrounding streets. In fact, the findings of the study indicate that the intersections in the immediate vicinity can readily accommodate the site generated traffic without any significant adverse impacts.

COMMENT F-77:
The increased traffic due to construction over the next 10 years, or longer, depending on the state of the future economy.

Eileen Aherne, email dated July 20, 2009.

RESPONSE F-77:
Construction traffic is a temporary and unavoidable impact.

COMMENT F-78:
Anyone living in the Landing area understood that:
The traffic will be a huge problem, especially on Herb Hill Road, at the intersection of Cottage Row and Brewster.

Linda Thompson, letter dated July 20, 2009.

RESPONSE F-78:
Since Herb Hill Road directly serves the project site, it is expected that traffic volumes will increase as a result of the project. However, the analysis results indicate that the project generated traffic will not result in any significant adverse impacts. Similarly, the analysis results indicate that the intersection of Brewster Street and Cottage Row will continue to operate at acceptable levels of service under future Build conditions.

COMMENT F-79:
Page F-42
Table III.F-8 compares traffic delays that are projected for the development with future no action. It is difficult to believe that the estimated increase of 1,844 residents for the proposed project will cause only the minimal delays presented. These projected impacts do not consider the increase in population from a full future build-out of the project or other development projects in Glen Cove and neighboring communities.

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

RESPONSE F-79:
The DEIS notes several instances where the delays are not minimal. The analysis results are representative of the cumulative impacts of the proposed action and other planned development projects in the general vicinity of the site as set forth in the official scoping document.

COMMENT F-80:
19. Section III.F.l *(Environmental Impacts and Mitigation Measures: Transportation: Traffic),* page III.F-3 through III.F-5 - Information is provided regarding the dates and times of the day that the various study intersections were observed; however, two intersections included in the list of intersection noted on page III.F-2 are not mentioned: Glen Cove Road at the Route 107 split, and Brewster Street and Cottage Row/School Street. Additionally, the turning movement count work sheets for the Glen Cove Road at the Route 107 Split are not included in Appendix L2.

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

RESPONSE F-80:
Per the DEIS page III.F-4, "Turning movement counts at the Brewster Street & Cottage Row/School Street intersection were performed on Tuesday, May 2, 2006 during the morning

(7:00 to 9:30 AM) and evening (3:30 to 6:00 PM) peak periods; and on Saturday, May 6, 2006 during the midday peak period (11:00 AM to 3:00 PM)." Copies of these counts are included in Appendix T-2.

Manual turning movement counts were not conducted at the intersection of Glen Cove Road at the Route 107 split. The traffic volumes at this intersection were calculated using the turning movement counts at the intersections of (1) Glen Cove Road and Glen Head Road and (2) Route 107 and Glen Head Road.

COMMENT F-81:

20. Section III.F.1.a *(Environmental Impacts and Mitigation Measures: Transportation: Traffic: Existing Traffic Conditions),* page III.F-14 - The DEIS presents a brief narrative and provides a table showing accident rates at the study intersections compared to statewide accident rates for similar roadways.

a. The FEIS should acknowledge that 15 of the 19 study intersections have higher accident rates than the statewide average for similar roadways, with some of the rates for study intersections being significantly higher, and should analyze the implications of these data.

b. The FEIS also should discuss the proposed action's impact on local accident rates, as well as mitigation measures as appropriate, which appears to have been omitted from the DEIS.

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

RESPONSE F-81:

See Response F-27.

COMMENT F-82:

21. Section III.F.1.b *(Environmental Impacts and Mitigation Measures: Transportation: Traffic: Future No-Action Traffic Conditions (Year 2016)),* page III.F-22 - The DEIS provides anticipated trip generation for other projects in the study area. The specific Land Use Codes and methods of trip generation estimates for other projects should be provided.

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

RESPONSE F-82:

See Response F-32.

COMMENT F-83:

22. Section III.F.1.c *(Environmental Impacts and Mitigation Measures: Transportation: Traffic: Proposed Action Traffic Conditions (Year 2016)),* page III.F-32 - Table III.F-7 includes a footnote pointing to Appendix L-7 where complete Trip Generation calculations can be found.

a. The information provided in Appendix L-7 includes the specific Land Use Codes utilized for trip generation; however, the method used to generate the anticipated number of trips (e.g., based on number of persons or dwelling units for apartments) is not provided.

b. The DEIS indicates that the public will utilize the waterfront esplanade and various other public amenities; however, the trip generation estimates do not appear to take into account these uses as trip generators.

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

RESPONSE F-83:
The basis for the trip generation calculations for the residential components of the project is the number of dwelling units; for hotels it is the number of suites; for office, retail and restaurant it is the gross square footage and for the marina it is the number of berths.

Trip generation estimates were not made for the waterfront esplanade and other public amenities because they are not expected to generate significant amounts of traffic during the analysis peak hours. It is expected that these public areas will be frequented by the new residents, as well as existing residents of Glen Cove who live nearby, hotel guests, spa patrons, shoppers, ferry passengers and visitors to the area with another attraction intended as their main destination. For this reason, we believe that peak hour traffic generated by the esplanade and other public amenities will be inconsequential during peak hours and is accounted for in the background growth factor applied to the existing volumes.

COMMENT F-84:
23. Section III.F.1.c *(Environmental Impacts and Mitigation Measures: Transportation: Traffic: Proposed Action Traffic Conditions (Year 2016))*, page III.F-42 through III.F-47 – The capacity analysis results indicate that a number of traffic movements or overall intersections would experience increased average delay time due to the proposed action. Where these delays occur, mitigation measures should be proposed to lessen the impact or an explanation offered as to why these delays cannot be mitigated; where the delays occur after proposed mitigation measures are incorporated into the analysis, additional mitigation measures should be examined or an explanation offered as to why these delays cannot be further mitigated. Impacted movements include:

<u>Glen Cove Road and Northern Boulevard</u>

a. Westbound thru/right-turn movement during the AM peak hour - Delay would increase by 13.4 seconds for the Proposed Action versus the No-Action condition, with the LOS remaining at LOS F (no mitigation offered).
b. Eastbound left-turn movement during the PM peak hour - Delay would increase by 29.1 seconds for the Proposed Action versus the No-Action condition, with the LOS remaining at LOS F (no mitigation offered).
c. Northbound thru movement during the PM peak hour - Delay would increase by 33.4 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS E to F (no mitigation offered).
d. Southbound thru movement during the PM peak hour - Delay would increase by 15.3 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS E to F (no mitigation offered).

e. Overall intersection during the PM peak hour - Delay would increase by 10.4 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS E to F (no mitigation offered).
f. Eastbound left-turn movement during the Saturday peak hour – Delay would increase by 32.9 seconds for the Proposed Action versus the No-Action condition, with the LOS remaining at LOS F (no mitigation offered).
g. Westbound left-turn movement during the Saturday peak hour - Delay would increase by 65.5 seconds for the Proposed Action versus the No-Action condition, with the LOS remaining at LOS F (no mitigation offered).
h. Westbound thru/right-turn movement during the Saturday peak hour - Delay would increase by 35.1 seconds for the Proposed Action versus the No-Action condition, with the LOS remaining at LOS F (no mitigation offered).
i. Overall intersection during the Saturday peak hour - Delay would increase by 14.2 seconds for the Proposed Action versus the No-Action condition, with the LOS remaining at LOS F (no mitigation offered).

Glen Cove Road and the NYS 107 Divide

j. Northbound thru movement during the AM peak hour - Delay would increase by 23.1 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from B to D (with mitigation offered).
k. Northbound thru movement during the PM peak hour - Delay would increase by 23.5 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from C to D (with mitigation offered).
1. Overall intersection during the PM peak hour - Delay would increase by 7.6 seconds for the Proposed Action versus the No-Action condition (with mitigation offered).
m. North-bound thru movement during the Saturday peak hour - Delay would increase by 9.2 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS B to C (with mitigation offered).

Glen Cove Ave and Glen Head Road

n. Westbound left/right/thru movement during the PM peak hour - Delay would increase by 14.1 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS C to D (with mitigation offered).
o. Eastbound left/right/thru movement during the Saturday peak hour - Delay would increase by 11.7 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS C to D (with mitigation offered).
p. Westbound left/right/thru movement during the Saturday peak hour- Delay would increase by 32.4 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS D to E (with mitigation offered).
q. Overall intersection during the Saturday peak hour - Delay would increase by 8 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS C to D (with mitigation offered).

Glen Cove Road and Back Road

r. Southbound thru movement during the AM peak hour - Delay would increase by 9.7 seconds for the Proposed Action versus the No-Action condition (no mitigation offered).

s. Southbound thru movement during the PM peak hour - Delay would increase by 13.2 seconds for the Proposed Action versus the No-Action condition (no mitigation offered).
t. Southbound left-turn movement during the SAT peak hour - Delay would increase by 9.4 seconds for the Proposed Action versus the No-Action condition, the LOS decreasing from LOS C to D (no mitigation offered).

Pratt Boulevard at Bridge Street/Continental Place
u. Eastbound left-turn movement during the PM peak hour - Delay would increase by 19.5 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS B to C (no mitigation offered).
v. Eastbound left-turn movement during the Saturday peak hour - Delay would increase by 20.9 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS B to C (no mitigation offered).

Herb Hill Road and Charles Street
w. Northbound left-turn movement during the PM peak hour - Delay would increase by 22.3 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS B to D (no mitigation offered).
x. Northbound left-turn movement during the Saturday peak hour - Delay would increase by 24.5 seconds for the Proposed Action versus the No-Action condition, with the LOS decreasing from LOS B to D (no mitigation offered)

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

RESPONSE F-84:
See Response F-39. As noted, the analysis results at the majority of the study intersection indicate that the overall intersections, as well as the individual lane movements, operate at Level of Service C or better. In these instances, an increase in delay time is not necessarily indicative of a significant impact and a LOS change from B to C does not always require mitigation since LOS C represents an acceptable peak hour operating condition. Additionally, low volume movements with delay increases do not necessarily warrant mitigation for an entire intersection.

Response F-39 offers additional discussions on impacts and mitigation at several of the study intersections mentioned in this comment.

COMMENT F-85:
24. Section III.F.l.d *(Environmental Impacts and Mitigation Measures: Transportation: Traffic: Mitigation Measures),* page III.F-62, 4th ¶ - The DEIS proposes, as a mitigation measure for the Glen Cove Road and Glen Head Road intersection, widening the roadway to provide one additional northbound and southbound lane, and modification of the traffic signal timing and phasing. As Glen Cove Road under the jurisdiction of New York State, approval by the NYS Department of Transportation (NYSDOT) is required:
a. The FEIS should indicate whether NYSDOT has been contacted regarding the proposed mitigation measures, and discuss any response that has been received from NYSDOT regarding same.
b. In the event that NYSDOT is not amenable to allowing the proposed mitigation

measures, alternate forms of appropriate mitigation should be offered.

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

RESPONSE F-85:

The DEIS was sent to NYSDOT and no comments have been received to date. Other than widening the northbound and southbound approaches to increase intersection capacity, the analysis shows that operations can be substantially improved by merely modifying the signal phasing and timing. No alternate forms of mitigation are being proposed. If NYSDOT is not amenable to allowing the Applicant to undertake these improvements at its own expense, the intersection operation will continue to deteriorate with or without the subject project.

COMMENT F-86:

25. Section III.F.1.d *(Environmental Impacts and Mitigation Measures: Transportation: Traffic: Mitigation Measures)*, page III.F-62, last ¶ - The DEIS discusses mitigation measures for the Glen Cove Road & Northern Boulevard intersection, which is adding a third through lane on the southbound approach of the intersection, and states that County is intending on undertaking this action subsequent to right-of-way issues being resolved first.

a. The FEIS should discuss the status of this roadway improvement, and offer additional forms of mitigation in the event the County is unable to resolve the right-of-way issues.

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

RESPONSE F-86:

Based on discussions with Nassau County, the right-of-way issues have not yet been resolved and for this reason the time frame for construction of a third through lane on the southbound approach of the intersection of Glen Cove Road & Northern Boulevard is uncertain. The revised analysis results contained in Appendix U-2 depict the operational impacts with and without the implementation of this widening. If the County does not proceed, conditions at this intersection will continue to deteriorate with or without the proposed action, although the analysis results indicate that signal timing adjustments will also help to improve conditions. No other forms of mitigation are proposed since virtually any additional improvements would require extensive property acquisition and disruption of existing businesses.

COMMENT F-87:

26. Section III.F.1.d *(Environmental Impacts and Mitigation Measures: Transportation: Traffic: Mitigation Measures)*, page III.F-63, 3rd ¶ - The DEIS proposes, as a mitigation measure for the Route 107 and Glen Head Road intersection, prohibiting eastbound left turns. As Route 107 is under the jurisdiction of New York State, approval by the state is required:

a. The FEIS should indicate whether NYSDOT has been contacted regarding the proposed mitigation measures, and discuss any response that has been received from NYSDOT regarding same.

b. In the event that NYSDOT is not amenable to allowing the proposed mitigation measures, alternate forms of appropriate mitigation should be offered.

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

RESPONSE F-87:
The DEIS was sent to NYSDOT and no comments have been received to date. One alternate means of mitigation would be to restripe the intersection to provide an eastbound left turn lane. Preliminary measurements indicate that this is viable and intersection restriping is a relatively minor improvement. Furthermore, it would not be worthwhile to prohibit the eastbound left turn lane for several reasons. First, providing a left turn storage lane would improve the flow of eastbound through vehicles since they would no longer have to wait behind a vehicle waiting to make an eastbound left turn, thus providing the same benefit for through traffic. Second, restricting this movement would be counter-productive in that it would force these left turn vehicles through the intersection and they would then have to make at least two additional turns at other intersections, resulting in even greater delays than those calculated for this movement in the analyses contained in the report. Finally, it is potentially less safe because it introduces the left turn vehicles to additional conflict points as a result of these additional maneuvers.

COMMENT F-88:
27. Section III.F.1.d *(Environmental Impacts and Mitigation* Measures: *Transportation: Traffic: Mitigation Measures),* page III.F-63, 4th ¶ - The DEIS proposes, as a mitigation measure for the Glen Cove Avenue and Glen Head Road intersection, optimizing the phase splits. As this signal is under the jurisdiction of Nassau County, approval by the County is required:

a. The FEIS should indicate whether NCDPW has been contacted regarding the proposed mitigation measures, and discuss any response that has been received from NYSDOT regarding same.
b. In the event that the NCDPW is not amenable to allowing the proposed mitigation measures, alternate forms of appropriate mitigation should be offered.

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

RESPONSE F-88:
The DEIS was sent to NCDPW and no comments have been received to date. Other than modifications to the signal timing, no alternate forms of mitigation are offered because the analysis results indicate that proposed timing changes will satisfactorily mitigate the project related impacts. It should be noted that the overall intersection operates at an acceptable LOS C under all scenarios and the only movement that is problematic is the southbound left turn. Since the mitigation analyses indicate that timing changes will result in overall intersection operation comparable to the future No-build conditions, it is unlikely that NCDPW would not be amenable to implementing such changes. Also, because existing ROW limitations prohibit any widening of the intersection and the overall intersection operation under future conditions with site generated traffic is relatively good, no further mitigation is proposed.

COMMENT F-89:
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.

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

RESPONSE F-89:
A cost-benefit analysis of alternate methods of providing shuttle bus service to the LIRR is beyond the scope of the DEIS. It is unlikely that the County's fixed route bus service will be able to accommodate the specialized needs of commuters in terms of coordinating with the train schedules. While it may be feasible to extend the City's existing circulator/loop bus routes to service the development, there will undoubtedly be other considerations in addition to cost that will enter into such decisions. The applicant has committed to provide shuttle bus service to the LIRR as a means of mitigating potential commuter parking impacts. As indicated in the DEIS, the shuttle buses may also be utilized to provide connections between the site and "downtown" Glen Cove, as well as other local destinations. The method of accomplishing this will not alter the findings in the DEIS.

COMMENT F-90:
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."
Satish Sood, Deputy Commissioner, Nassau County Planning Commission, letter dated April 21, 2011.

RESPONSE F-90:
The MTA study referenced in the comment is not necessarily pertinent to the DEIS since the shuttle bus is being proposed as an amenity for the residents and thus the financial viability is less of a consideration. However, as stated in response to the comment above, in addition to servicing commuters, the proposed shuttle buses may also be used to link the site to the "downtown" and other local destinations throughout the day. Based on this, it is possible that the ridership will meet the criteria of 50 daily passengers cited n the MTA report.

COMMENT F-91:
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.
Satish Sood, Deputy Commissioner, Nassau County Planning Commission, letter dated April 21, 2011.

RESPONSE F-91:
The format of the DEIS is based on the outline in the official scope. Typically, construction impacts are not analyzed in detail since they are unavoidable and temporary in nature. As indicated, construction is expected to be phased over approximately 10 years and the number of construction employees on-site will vary depending on the nature of the work that is underway at any given time. The typical shift time for construction workers is from 7:00 AM to 3:30 PM, while the typical morning peak traffic on area roadways occurs after 7:00 AM and the afternoon traffic peak occurs after 4:00 PM. Therefore, the construction workers will be arriving at the site well before the normal peak traffic hours in the morning and departing in advance of the afternoon peak traffic hours. Based on this, the construction worker traffic is not expected to have any significant impact on the operation of the study intersections or on the roadways in the vicinity of the site during peak traffic hours.

In terms of construction truck traffic, the maximum number of trucks making material/ equipment deliveries to the project site is expected to be in the range of 20 to 25 trucks per day on the busiest days during the height of construction activity. However, on most days the number of trucks will be far less. When distributed over the course of the day, this number of trucks will not have any measurable impact in terms of intersection or roadway capacity. Additionally, all trucks will be directed to access the site via Glen Cove Road/Pratt Boulevard, thereby eliminating the potential for adverse impacts on local streets.

Finally, after extensive review of the document, the City's consultant has determined that the construction impact section of the document is acceptable.

COMMENT F-92:
Why use the LIPT growth rate when a more recent rate is available from NYMTC?
Satish Sood, Deputy Commissioner, Nassau County Planning Commission, letter dated April 21, 2011.

RESPONSE F-92:
The NYSDOT growth rate was specifically identified in the official scoping document. Furthermore, a review of the NYMTC Regional Transportation Plan (RTP) indicates that the NYMTC growth rate for automobile trips is projected to be less than the LITP rate used in DEIS.

COMMENT F-93:
Why use trip generation data based on the 7th edition of the ITE Trip Generation Handbook when the 8th edition is available?
Satish Sood, Deputy Commissioner, Nassau County Planning Commission, letter dated April 21, 2011.

RESPONSE F-93:
The DEIS was initially prepared prior to the publication of the 8th edition of ITE's Trip Generation. However, at the request of the City's consultant, a comparison of the project

generated trips based on the two editions of the ITE document was conducted and it was found that the results were virtually identical.

COMMENT F-94:
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.
Satish Sood, Deputy Commissioner, Nassau County Planning Commission, letter dated April 21, 2011.

RESPONSE F-94:
A pedestrian circulation plan, DEIS Exhibit II-10, showing the connectivity to "downtown" Glen Cove is included in the DEIS, which is part of the overall submission. A determination as to who will be responsible to implement and fund the recommended pedestrian safety improvements at the Charles Street / Herb Hill Road and Brewster Street/Herb Hill Road intersections will be made by the City during the approval process.

COMMENT F-95:
It would be helpful to get some detail about 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 to walk further to reach the station without having to be concerned about parking.
Satish Sood, Deputy Commissioner, Nassau County Planning Commission, letter dated April 21, 2011.

RESPONSE F-95:
The project includes a continuous esplanade along the waterfront as well as continuous sidewalk along the entire length of Garvies Point Road/Herb Hill connecting the project to downtown Glen Cove. Although it is unlikely that residents will opt to walk to the Glen Street LIRR station, there is a continuous sidewalk along the entire length of Glen Street. In fact, Nassau County has recently undertaken a major streetscape project, including new sidewalks, along almost the entire length of Glen Street between the downtown area and the Glen Street railroad station.