



PO Box 159, Sea Cliff, NY 11579 | 516.801.6792 | info@thecshh.org

February 26, 2024

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Mayor Panzenback
Glen Cove City Council
Glen Cove City Hall
9 Glen Street
Glen Cove, NY 11542

Re: Scoping Document for the Generic Environmental Impact Statement (GEIS), *Smart Growth Comprehensive Plan with Sustainability Elements*

Dear Mayor Panzenbeck and Members of the City Council:

The Coalition to Save Hempstead Harbor (CSHH) applauds the City of Glen Cove's efforts toward creating a blueprint for the future of Glen Cove through its *Smart Growth Comprehensive Plan with Sustainability Elements* (Comprehensive Plan) as well as the city's work toward becoming a Climate Smart Community. The consolidation of historical and demographic information and assessment of the city's land use, zoning, infrastructure, natural resources, and climate information are impressive. CSHH strongly supports the transparency of the process to examine the plan and the effort to provide as complete a picture as possible of the current and projected conditions in Glen Cove as they relate to future development and the well-being of city residents and residents of surrounding communities, who will also be affected by Glen Cove's implementation of Comprehensive Plan recommendations. Further, the Comprehensive Plan's focus on water resources and the serious consideration given to the CSHH's water sustainability report are laudable.

The Coalition to Save Hempstead Harbor (CSHH) appreciates the opportunity to submit comments with respect to Glen Cove's Comprehensive Plan. Our comments and questions related to the full EAF, the GEIS Scoping Document triggered by the Comprehensive Plan, and individual chapters of the plan are attached.

Thank you for your consideration.

Best regards,

Kay Bromberg
Vice President

Carol DiPaolo
Water-Monitoring Coordinator

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CSHH COMMENTS RE: CITY OF GLEN COVE SMART GROWTH COMPREHENSIVE PLAN WITH SUSTAINABILITY ELEMENTS

Environmental Assessment Form, Part 2

1. Impact on Land (g): For the question as to whether the proposed action is in a Coastal Erosion hazard area, “yes” is checked off. We agree, but see #3 below.

3. Impact on Surface Water: “No” is checked off to the question as to whether the proposed action may affect one or more wetlands. However, given the response above and the potential for the proposed action to cause soil erosion, create a source of stormwater discharge that may lead to siltation or other degradation to receiving water bodies, the response to #3 should be “yes.” Further, responses to 3e and 3h-k should be checked as “small impact may occur”—at the minimum.

4. Impact on Groundwater: It is acknowledged that the proposed action may result in new or additional use of ground water and that water supply demand may require new water supply wells or create additional demand on supplies from existing water supply wells (4a, moderate to large impact may occur). Therefore, the 4b response (regarding the question of whether the “water supply demand from the proposed action may exceed safe and sustainable withdrawal capacity rate of the local supply or aquifer) should be changed from “no, or small impact may occur” to “moderate to large impact may occur.”

5. Impact on Flooding: It is acknowledged that the proposed action may result in development on lands subject to flooding. Numbers 5a-f (regarding floodways, floodplains, required modifications to existing drainage patterns, etc.) have been characterized as having “no, or small impact may occur.” Given current projections for sea level rise, patterns for more frequent and severe storm systems, and recent studies on the exposure of communities and infrastructure to land subsidence on the east coast, 5a-f should be checked off as “moderate to large impact may occur.” (See Rojanasakul, M., Hernandez, M., The East Coast is sinking, *New York Times*, 2/14/24, <https://academic.oup.com/pnasnexus/article/3/1/pgad426/7504900?>.)

12. Impact on Critical Environmental Areas: Given the impact acknowledged in #4 above related to groundwater, #12a-b, related to the groundwater protection area, should be checked as potentially having a “moderate to large impact.”

Environmental Assessment Form, Part 3

In describing the proposed action and reasons supporting the Determination of Significance, Part 3, page 1, lists moderate and large impacts on transportation and groundwater and small impacts on:

- Land
- Flooding
- Historic and Archeological Resources
- Critical Environmental Areas
- Human Health

For reasons CSHH has provided for previous sections of the EAF, impacts on **flooding** and **critical environmental areas** should be characterized as having larger, community-wide impacts. They should be listed among the areas that will have “moderate to large impacts” and fully evaluated in the generic EIS. Further, to list flooding as

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having a small impact on Glen Cove is inconsistent with the vulnerabilities listed in the “2023 Climate Vulnerability Assessment and Adaptation Strategies Plan for the Western Gateway” (in Chapter 6 of the Comprehensive Plan) as well as observations by members of the community regarding recent storm events (page 119 of the Comprehensive Plan).

Comprehensive Plan Chapter Review

Chapter 2, Demographics and Housing: We strongly support the recommendations to control the scale and density of new development. There should be stringent analysis of high-density proposals to determine whether increased demand on water supply and water and sewer infrastructure can be sustained.

Chapter 6, Natural Resources, Climate Change, and Resilience: Page 119 lists resilience and adaptation strategies recommended in the Climate Vulnerability Assessment. Additional measures could include:

- Natural berms with seagrasses along the flood-prone areas of the coastline to reduce both erosion from wave action and inundation in low-lying areas
- Strategic retreat where feasible

Table 6-1. Changes in Energy Use, Natural Gas and GHG Emissions between 2021-2022, City of Glen Cove, lists an increase in use for drinking-water pump stations. Energy use on Long Island increases substantially in the summer. Water pumpage and treatment is a major driver of increased electricity consumption. It drives up the cost of water and also drives up the cost of energy production to meet demand. As a sustainability measure, water-production and water-treatment facilities should consider converting to solar energy resources for the high-demand portions of the day. Battery backup would be desirable for high-demand evening water demand.

Page 129, last line: The reference to “CHSS” should be corrected to “CSHH.”

Ecology, page 134: As a point of information regarding the birds that can be seen around Hempstead Harbor, there are at least two nesting pairs of bald eagles that have taken up residence on the eastern shore of the harbor. Among recommendations to limit impacts to fish and wildlife, an important strategy that should be mentioned to improve water quality and habitat is reducing the use of lawn fertilizers and pesticides.

Flood Plains, page 136. This section states that “South of Glen Cove Creek, community facilities within the 100-year floodplain include the Police Department and Harbor Patrol (with a required BFE of 10 feet); the Tiegerman Elementary School is located in the 500-year floodplain. Both the Fire Department and the Volunteer Emergency Medical Service (EMS) Corps are located just outside of the 100-year floodplain.” The concept of strategic retreat should be considered for critical facilities or infrastructure within the flood plain that can be accomplished over time. As climate change progresses, the 100-year and 500-year floodplain designations will expand, encompassing more land area and including additional structures at risk for major flooding and related damage.

Sea Level Rise, page 139: This section of the plan fully describes the vulnerabilities that exist as sea levels rise and coastal areas also experience more frequent and severe storms and associated storm surge. Flooding again becomes a major issue affecting critical community facilities and infrastructure, as well as coastal habitats and ecosystems.

Glen Cove's sea-level rise maps are invaluable for assessing the risk of building too close to the shore and in a floodplain. New development proposals must be viewed in the context of the highest predicted sea level rise or flooding event.

Coastal Risk Areas, page 146: This section indicates that the northern part of the city and Glen Cove Creek fall into the highest risk areas (as defined by NYS Department of State's coastal risk assessment), but most of Glen

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Cove is vulnerable to significant damage from major storms. The land use and zoning regulations for the entire city should be reexamined to promote actions by every resident and building owner to protect their properties against rain and wind impacts (for example, by improving drainage and grading to slope water runoff away from structures).

Heat Vulnerability and Urban Heat Island Effect, page 148: Glen Cove is considered to have a moderate to high heat vulnerability. Additional approaches to those listed at the end of Chapter 6 that could be used to address this are:

- Use of white roofs to reflect solar radiation.
- Use of high R-value insulation for roofs.
- Use of solar energy to power air conditioning.
- Use of zoning and building codes to encourage passive air movement in buildings to promote cooling; take advantage of natural wind patterns when locating and building new construction.
- Planting less turf grass for residential areas and more drought-resistant plants to reduce water demand while offering the benefits of plant cover.
- Expansion of public swimming facilities.

The list of recommendations included at the end of this section of the Comprehensive Plan offer excellent opportunities for addressing the issues related to climate change and resiliency.

Chapter 7, Infrastructure and Utilities

Existing Conditions, Water Infrastructure, Capacity, page 169: Throughout the Comprehensive Plan, drinking-water use and water conservation are highlighted as critical considerations for future of Glen Cove. This section of the plan states that the city has sufficient water capacity to serve the current built environment and relies on pumpage numbers from the 2020, 2021, and 2022 Drinking Water Quality Reports of the Glen Cover Water Department. The annual pumpage stated for these years is 1.314 billion gallons, 1.429 billion gallons, and 1.429 billion gallons respectively. For each year’s water quality report, it is stated that there is a 2.3% increase in pumpage from the year before, i.e.:

Year	Annual Pumpage (Billions of Gallons)	% Increase in Pumpage
2019	1.314	2.3% over 2018
2020	1.314	2.3% over 2019
2021	1.429	2.3% over 2020
2022	1.429	2.3% over 2021

The numbers reported in the city’s Annual Drinking Water Quality Reports (summarized above) do not accurately reflect water usage for these years and should not be relied on for planning purposes. These annual reports should be updated with data for actual usage and reflect accurate changes from year to year.

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Quality: Table 7-1, Summary of well capacities, page 172, reports on 9 wells, with 4 of those abandoned or out of service and provides the total capacity (flow rate) of the five wells at 6,980 gallons per minute. However, on page 173, the last bullet, “New Well,” states: “The City currently has three of its five wells in operation.” This information appears to be inconsistent. If the inconsistency in reporting the number of wells in operation has to do with seasonal usage, the time frame over which the wells operate should be stated. Also, in reporting each well’s capacity in terms of flow rate makes it difficult to ascertain whether the amount of water that can be pumped from each well exceeds the actual amount pumped from each well. Further, it is not clear whether under current conditions the total capacity of wells and storage tanks is adequate to meet peak summer water demand.

Sewer System: This section states (at page 174) that “The [sewage treatment] plant has a permitted capacity of 5.5 MGD; however, as of 2019, the plant treated only approximately 3 MGD.” The section further states that Garvies Point PUD project “was designed for peak flow of approximately 1.117 MGD and when accounting for future developments, the demand reaches approximately 1.484 MGD. Both figures are below the pump station’s design capacity.” However, at 4.484 MGD of treatment (including the buildout of 1 Garvies Point Road the Konica Minolta property), the plant could reach its capacity of 5.5 MGD sooner than anticipated, given current development plans outside of Garvies Point, the city’s plans for future higher-density development in the future, and the potential for additional sewer line hookups to the sewage treatment plant from neighboring communities.

In this section, there should be more information regarding the condition of the approximately 69 miles of pipes in the sewage collection system. There should be at least some preliminary assessment available of the needed upgrades to prevent sewer line breaks, such as the one that occurred in 2021 and that discharged raw sewage to Glen Cove Creek for months before being discovered.

This section omits mention of any problems with sanitary sewer overflows (SSOs). Given the age of the system and the low-lying areas, it seems reasonable to expect that rainwater is able to enter the sewer system, leading to overflows prior to reaching the STP. Further, there have been instances in which blockages in the system have caused backups with raw sewage being discharged to streets and to Glen Cove Creek. This issue should be examined during the EIS process.

Stormwater Management: As stormwater increases with the intensity of storms, the design criteria for calculating the size of a stormwater pipe will change. An evaluation of the current pipe size/capacity vs. the increased size based on future storms is needed. A plan for stormwater pipe replacement is appropriate. The city should attempt to retain as much stormwater in the interior and in the higher elevations of the city. This will help control the accumulation of stormwater near the coastline and where flooding is already a problem.

We completely agree that the 2-inch minimum of stormwater containment is inadequate. CSHH has previously submitted comments to Glen Cove relating to the Garvies Point PUD and the need to meet Nassau County’s requirements of on-site recapture of stormwater— 8-inches, or 5 inches if the soils and slopes are acceptable to control the runoff.

Chapter 9, Future Land Use Plan and Implementation

The matrix at the end of this chapter is excellent—not only for reviewing implementation progress, but also for prioritizing the actions and the funding that will be needed to support critical infrastructure upgrades. At page 223, six methods are listed for the city to ensure that as many plan recommendations are implemented as possible. For the sixth item, “Partnership,” Glen Cove should be at the forefront in asking county and state partners to define and enforce regional parameters for sustainable water withdrawal from the aquifer, limitations on pumpage, and reductions in peak-season water use to assure that Glen Cove and all of its municipal neighbors on Long Island have an equitable and sustainable water withdrawal and distribution system.

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