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November 16, 2021

Mayor Sandy K. Quentzel and Board of Trustees
Village of Roslyn Harbor
500 Motts Cove Road South
Roslyn Harbor, NY 11576

Re: Scoping Document for RXR's Draft EIS

Dear Mayor Quentzel and Members of the Board of Trustees:

Thank you for this opportunity for the Coalition to Save Hempstead Harbor (CSHH) to submit comments regarding the scoping document for RXR's draft EIS for their proposed multi-unit development at the Engineer's Country Club. We have several concerns:

CUMULATIVE IMPACT

There are many multi-unit residential projects, some already approved and some still in the proposal stage, that could result in a very large impact on the regional potable water supply, stormwater runoff, sanitary waste disposal, air quality, traffic, and loss of habitat. It is critical that the draft EIS address the impact of the project at the Engineer's CC in the context of the total regional buildout. Here is a summary of current and potential developments:

Approved

Garvies Point	1110 units
Village Square, Glen Cove.....	146 units
Livingston/Villa, Glen Cove....	176 units
Glen Harbor /Hinfin.....	48 units
Roslyn Landing.....	78 units
Roslyn Village Lumber Rd.....	40 units
<u>Roslyn Heights Warner Ave.....</u>	<u>54 units</u>
TOTAL	1,652 units

Proposed projects:

Southern Land Co—Shore Rd, Port Wash.....	176 units
Garvies Point Amended Phase II proposal.....	79 units additional (including relocation of workforce housing)
• Potential buildout of Konica property.....	336 units
• Potential buildout of 1 Garvies Pt. Rd.....	100 units
<u>North Reality & 40 GPR—2 ten-story towers.....</u>	<u>400 units</u>
TOTAL	1,147 units

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TRAFFIC

As reported in Newsday, 3/23/21 (<https://www.newsday.com/long-island/transportation/long-island-traffic-intersections-1.50191269>), the **Glen Cove Rd and Northern Blvd. /North Hempstead Tpke intersection** is ranked number 5 in a list of the worst traffic delays in the entire state. See below:

NEW YORK INTERSECTIONS WITH GREATEST DELAYS

These are the New York intersections with the worst traffic delays, according to INRIX's study. The firm analyzed more than 18,000 intersections in New York over one week in October 2020. These intersections had the greatest estimated daily hours of delay. The list also shows estimated average daily traffic volume.

1. *Atlantic Ave. & 4th Ave., Kings: 76,331 vehicles, 1,086 hours of delay*
2. *Long Beach Blvd. & E. Park Ave., Nassau: 95,596 vehicles, 1,046 hours*
3. *Pennsylvania Ave. & Atlantic Ave., Kings: 67,066 vehicles, 979 hours*
4. *Tillary St. & Flatbush Ave. Extension, Kings: 74,298 vehicles, 938 hours*
5. ***N. Hempstead Tpke. & Glen Cove Rd., Nassau: 60,872 vehicles, 926 hours***

STORMWATER MANAGEMENT

The effects of climate change resulting in more extreme weather have become obvious on Long Island and pose a more serious challenge than rain events in the past. In the Hempstead Harbor area of Sea Cliff and Glen Cove this past season alone, three storm events resulted in over 5 inches of rain, with two other events resulting in 2 or more inches of rain:

July 8-9.....	5.11 inches (3.72 inches on July 9)
July 25-26.....	2.55 inches (2.35 on July 26)
August 21-23.....	5.63 inches (3.81 on August 22)
September 1-2.....	6.57 inches (Sea Cliff rain gage; over 9 inches reported in Glen Cove; post-tropical storm IDA)
September 23-24....	1.96 inches

CSHH recommends implementing Nassau County's requirement of 8 inches of stormwater retention.

NEW YORK STATE'S CLIMATE LEADERSHIP AND COMMUNITY PROTECTION ACT (CLCPA)

This legislation sets carbon reduction targets which cannot be met unless the state moves quickly to a green energy economy. This means phasing out fossil fuels, e.g., natural gas, as a source of energy and heating with the following schedule:

- 70% renewable energy by 2030
- 100% zero-emission electricity by 2040
- 85% reduction in greenhouse gas emissions by 2050

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According to CLCPA, the following provisions must be considered by all state agencies:

“29 § 7. Climate change actions by state agencies.

- 1. All state agencies shall assess and implement strategies to reduce their greenhouse gas emissions.*
- 2. In considering and issuing permits, licenses, and other administrative approvals and decisions, including but not limited to the execution of grants, loans, and contracts, **all state agencies, offices, authorities, and divisions shall consider whether such decisions are inconsistent with or will interfere with the attainment of the statewide greenhouse gas emissions limits established in article 75 of the environmental conservation law.** Where such decisions are deemed to be inconsistent with or will interfere with the attainment of the statewide greenhouse gas emissions limits, each agency, office, authority, or division shall provide a detailed statement of justification as to why such limits/criteria may not be met, and identify alternatives or greenhouse gas mitigation measures to be required where such project is located.”*

The draft EIS must address how RXR will meet these new requirements and not lock in dependence on fossil fuels for energy or heating for the next 50 years. The DEC and other state agencies are mandated by law to deny permits or seek alternatives if these criteria are not met.

Sincerely,



Kay Bromberg
Vice President