

State Environmental Quality Review Act (SEQR) SUPPLEMENTAL FINDINGS STATEMENT

CITY OF GLEN COVE SMART GROWTH COMPREHENSIVE PLAN WITH SUSTAINABILITY ELEMENTS

Name of the Proposed Action: City of Glen Cove Smart Growth Comprehensive Plan with Sustainability Elements

SEQR Classification: Type 1 Action

Location: City of Glen Cove, Nassau County, NY

Lead Agency: Glen Cove City Council
City of Glen Cove
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Funding Partners

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Supplemental Findings

Following the adoption of the Findings and the Comprehensive Plan on July 23, 2024, a letter commenting on the Draft Generic Environmental Impact Statement (DGEIS) was received by the Glen Cove Community Development Agency (CDA) from the New York State Department of Environmental Conservation (NYSDEC) when NYSDEC emailed it to the CDA on August 23, 2024. The letter dated May 13, 2024 was emailed to the City from Mark DePaul Lowery, Assistant Director, NYSDEC, Office of Climate Change on May 10, 2024, within the DGEIS comment period (see Attachment 1), but was not received by the City until August 23, 2024. Accordingly, these supplemental findings are intended to provide appropriate responses to NYSDEC's comments on the DGEIS.

The adopted findings are amended as follows:

- **Public Review** – Written comments regarding the DGEIS were accepted from April 10 until May 13, 2024. ~~There were no comments received on the DGEIS. A letter dated May 13, 2024 was sent by Mark DePaul Lowery, Assistant Director, NYSDEC, Office of Climate Change on May 10, 2024. This was the only written comment received.~~

Responses

1. Through this Supplemental Findings Statement, the City hereby accepts the following change to the DGEIS adopted on April 9, 2024:

1.5 Involved Agencies & 2.6 Involved Agencies

The NYSDEC contact is changed from "Attn: Basil Seggos" to "Attn: Office of Climate Change."

2. In response to the NYSDEC comments on DGEIS Section 3.2.3 Transportation: Mitigation Measures, the City provides the following:

The mitigation measures discussed in the DGEIS are intended to mitigate any significant adverse environmental impacts created by the Proposed Action (the Adoption of the Comprehensive Plan). Because the Proposed Action is generic in nature (an areawide policy guidance document, with no site-specific projects), the DGEIS looks at how these policies would impact the environment in the future. Any site-specific project would be subject to review under SEQR. The City does not anticipate any significant adverse environmental impacts from the Proposed Action. Rather, it is anticipated that the adoption of the Comprehensive Plan would improve the City by providing a more sustainable future.

Nevertheless, the City decided to review potential impacts to ensure that any impacts were considered and recommendations to mitigate those impacts identified. The Comprehensive Plan makes zoning policy recommendations that would target future development that follows Smart Growth principles. No specific zoning text is proposed as zoning is seen as one implementation form for the Comprehensive Plan. However, it is important to note that the Comprehensive Plan also makes recommendations to avoid overdevelopment and to prohibit more density than is allowed by existing zoning without an

overriding public purpose. The effect of these recommendations is to direct new development to infill sites, such as a previously developed waterfront areas or near certain train stations and away from established neighborhoods or areas that do not have the infrastructure to support further development.

Through analysis, it was determined that two factors, traffic and groundwater, had the most potential to present significant impacts and would be evaluated further.

The potential impacts of the Comprehensive Plan's recommendations for zoning changes that would enable contextual infill development (i.e., redevelopment of underperforming sites at the north side of the Glen Cove Creek Waterfront, and the exploration of Transit Oriented Development (TOD) zones near the Sea Cliff and Glen Street Long Island Rail Road (LIRR) stations) could lead to a slight increase in residential or commercial development, which in turn could alter traffic patterns in the City. To address this concern, the DGEIS proposed three types of mitigation measures: Pedestrian Improvements, Intersection Improvements, and Public Garage Improvements.

The letter from DEC provided feedback on these mitigation measures and can be summarized as follows:

- A. Include more discussion of pedestrian strategies, including connections to the commercial areas at Forest Avenue, Brewster Street, and the waterfront.
- B. Discussion of bicycle strategies, including connecting TOD areas to bike trails and lanes and not just to park-and-ride lots or parking garages for train access to encourage biking is imperative.
- C. A focus on transitioning away from strip-mall style commercial development would enhance efforts to reduce greenhouse gas (GHG) emissions due to transportation.

A. Pedestrian improvements, as a mitigation measure to additional infill development recommended in the Comprehensive Plan, include strategies to improve the safety of the Brewster Street – Herb Hill Road intersection (the key connection between downtown and the waterfront); improvements to the Glen Street/Cedar Swamp Road corridor (the main connection between the Glen Street LIRR Station and downtown), and connections to and from schools and community facilities.

In addition to these mitigation measures specific to the DGEIS, it is important to note that the Comprehensive Plan provides numerous recommendations to improve pedestrian infrastructure, connections, and safety that would be beneficial throughout the City:

- Recommendation 4.1 in the Comprehensive Plan recommends improving pedestrian safety at the intersections with the highest crash rates, including on Forest Avenue, Brewster Street, and Herb Hill Road (which provides a connection between the downtown and the waterfront). This recommendation also advises that updates and enhancements for pedestrian experience and safety follow recommendations of prior studies, including from the Vision Long Island/AARP/LI Complete Streets Coalition and the City's Complete Streets Policy. These interventions include providing more crosswalks, pedestrian signage, crossing lights, pedestrian-level lighting, pedestrian signaling (particularly around schools and other community facilities), and Americans with Disabilities Act (ADA) compliance upgrades to improve crosswalks, alleyways, curb ramps, and pavers.
- Recommendation 4.2 in the Comprehensive Plan discusses transportation considerations for transit-oriented development, including emphasis on the need to provide pedestrian and bicyclist connections between new TODs and adjoining neighborhoods.

- Recommendation 4.3 focuses on the need for safe pedestrian connections from the downtown to the waterfront, including Herb Hill Road, Brewster Street, and Pratt Park. An illustration is provided to identify this imperative connection.
- Acknowledging the County’s jurisdiction over the Glen Cove Avenue – Brewster Street – Forest Avenue Corridor, the Comprehensive Plan emphasizes the need to partner with the County to make Complete Streets enhancements, improve safety, and strengthen waterfront access from this key corridor.
- Furthermore, the Downtown and Economic Development chapter of the Comprehensive Plan reiterates the importance of streetscape improvements and pedestrian safety and access to the downtown and other commercial nodes. Recommendation 5.3 identifies the need for ADA compliance, upgrades to sidewalks, crosswalks, alleyways, curb ramps, and paving, and furthers the recommendation to connect the waterfront and downtown by suggesting an Art Walk and landscaping along this key connection.

B. The mitigation measures for transportation impacts discussed in the DGEIS focused on pedestrian improvements, intersection improvements, and public garage improvements and did not specifically call out bicycle strategies as a mitigation measure. However, bicycle strategies are discussed in the Comprehensive Plan and are considered a beneficial impact to the City.

Following discussions with the City Council, the Draft Comprehensive Plan was revised to highlight the importance of bicycle infrastructure and the need for a comprehensive bicycle study. Thus, an additional recommendation was added to the Comprehensive Plan prior to its adoption:

4.8 Consider conducting a City-wide bicycle study to identify a strategy for bicycle infrastructure investments.

Recent investments such as the Garvies Point Greenway provide an opportunity for the City to further expand its network of safe bicycle paths to encourage bicycle use. A comprehensive bicycle study should identify locations for expanded infrastructure with a focus on safe circulation. The City could also explore opportunities for a bikeshare program, particularly near the waterfront and public parks.

While the Comprehensive Plan indicates some locations where bicycle and pedestrian infrastructure, connections, and safety will be key in Glen Cove (e.g., connecting the waterfront esplanade to the downtown, and connecting commercial corridors and train stations), a comprehensive study of the City and development of a standalone strategy for bicycle infrastructure would be the most appropriate way to identify and implement those projects.

The inclusion of this recommendation in the adopted Comprehensive Plan has already enabled the City to apply for a New York State Energy Research and Development Authority (NYSERDA) Clean Mobility Program Clean Transportation grant to conduct a bicycle infrastructure feasibility study (see Attachment 2). This study builds on the City’s ongoing initiatives including the Downtown Corridor Study on Glen Street and the Complete Streets Policy adopted in 2021.

The proposed bicycle study would emphasize connections between the waterfront, the downtown, and train stations, and connections between two existing protected bicycle lanes in the City. The Comprehensive Plan text emphasizes the importance of creating safe bicycle and pedestrian connections between these nodes, while the dedicated bicycle study would build on these recommendations to create an implementation strategy.

The City's efforts in this regard will serve to mitigate traffic impacts due to future development.

C. The Comprehensive Plan does not encourage the development of strip-mall style commercial development. While there may be such types of development within Glen Cove, they are not a result of adopting the Comprehensive Plan. Therefore, the impacts of those existing developments are not within the scope of analysis for the DGEIS.

On the other hand, the Comprehensive Plan's recommendations do help the City move away from strip-mall style development by emphasizing infill development strategies and considering zoning changes to some commercial areas.

To improve connections to commercial nodes in the City and to reduce vehicular emissions, the Comprehensive Plan provides several recommendations in addition to the pedestrian and bicycle interventions discussed above. These include parking strategies, ways to improve and increase the use of public transportation (including LIRR, Nassau Inter-County Express (NICE) bus, and City LOOP bus service), exploration of micro-transit and on-demand transit with the County, and electrification of vehicles. In May 2017, the City was awarded a \$14,000 rebate from the NYSDEC to install two dual port Electric Vehicle (EV) charging stations in the Pulaski Street parking garage. In April 2023, the City was awarded a grant through the NYSERDA Municipal Zero-emission Vehicle (ZEV) Infrastructure Grant Program (approximately \$48,000) to install EV charging stations at the Brewster Street parking garage. The City is still awaiting the disbursement of funding from the NYSERDA grant to install these additional charging stations.

As discussed in more detail in the Natural Resource, Climate Change and Resilience Chapter of the Comprehensive Plan, the City of Glen Cove is aware of the impacts of greenhouse gas (GHG) emissions and is committed to reducing fossil fuel consumption and GHG emissions. In addition to the actions the City is already taking, including the implementation of EV charging stations, the Comprehensive Plan outlines several additional strategies that the City can take to reduce GHG emissions and identifies funding sources to position Glen Cove to take these steps.

3. In response to NYSDEC's comments on DGEIS section 3.7 Flooding, the City provides the following:

As discussed above, the purpose of the DGEIS is to identify significant adverse impacts of the Proposed Action and present solutions to mitigate those impacts. It was determined that most recommendations in the Comprehensive Plan will be beneficial to the City. Through the EAF parts 2 and 3, it was determined that the Proposed Action may result in large to moderate impacts on transportation and groundwater. The EAF parts 2 and 3 also identified some areas that may have small impacts, including

flooding. Thus, in Scoping, the City noted that flooding would be described qualitatively in the DGEIS. Specifically, the Final Scope stated that the DGEIS would:

3.8.1. Existing Conditions: Identify areas included in the 100-year floodplain. Describe sea level rise projections using NYSDEC data for 2050. Utilize maps and tables as appropriate.

3.8.2 Potential Impacts: Discuss potential impact of the Proposed Action on drainage patterns. Identify low-lying areas where projected sea level rise and floodplain expansion is more likely to cause impacts.

The Draft Scope was shared with NYSDEC, as an involved agency, and was open for comment from January 24 – February 26, 2024. NYSDEC did not comment on the Draft Scope. Only one letter of comment was received during the scoping period—from the Coalition to Save Hempstead Harbor—and those comments were addressed, and a Final Scope was adopted by the City Council on March 26, 2024.

The DGEIS follows the prescribed format outlined in the Final Scope, identifying the 100-year and 500-year floodplain, describing sea level rise projections using NYSDEC data for 2050, and identifying low-lying areas of risk. The DGEIS identifies the effects of the Proposed Action on drainage by outlining the Comprehensive Plan’s recommendations for Stormwater Management and Sea Level Rise and finds that if these recommendations would be implemented, they would have beneficial impacts on the City.

In addition, the recommendations within the Comprehensive Plan point to strategies identified in the City’s Climate Vulnerability Assessment and Adaptation Strategies Plan for the Western Gateway and the County’s Multi-Jurisdictional Hazard Mitigation Plan, and to regional solutions from the County and State.

The analysis of existing conditions in the Comprehensive Plan identified many concerns and impacts of flooding experienced under the current conditions, which are expected to be exacerbated by factors of climate change including increased intensity and frequency of rainstorm events, sea level rise, and factors of development, including regional development and build-out under existing zoning conditions. These impacts are expected with or without the adoption of the Comprehensive Plan. Because the purpose of the DGEIS is to evaluate the impacts that would be generated by the Proposed Action, we found that it was sufficient to point to the numerous recommendations within the Comprehensive Plan to reduce flooding impacts through stormwater management and green infrastructure and to take resiliency measures to address sea level rise and other climate change impacts.

As mentioned above, the adoption of the Comprehensive Plan will not increase the risk of severe downpours. Severe downpours will increase due to climate change factors. The Comprehensive Plan addresses these concerns and recommendation 7.3.2 specifically recommends aligning the City’s requirements for on-site stormwater recapture with the County’s to increase the required size from about two inches (under current NYS minimum regulations) to five to eight inches.

Nuanced studies—to determine siting and design of flood control structures—is out of the scope of this Comprehensive Plan and DGEIS. However, more specific studies, such as the City’s Climate Vulnerability Assessment and Adaptation Strategies Plan for the Western Gateway and the County’s Hazard Mitigation Plan, have identified some strategies that are incorporated into the Comprehensive Plan by reference.

NYSDEC has asked for mitigation strategies when the Proposed Action is not proposing any site-specific land development projects. Development applications submitted for future projects that advance the Comprehensive Plan's recommendations will be subject to site-specific SEQRA review.

Attachments

Attachment 1: Letter commenting on the Smart Growth Comprehensive Plan with Sustainability Elements DGEIS from NYSDEC dated May 13, 2024

Attachment 2: City of Glen Cove application for NYSERDA Clean Mobility Program Clean Transportation grant funding to conduct a bicycle infrastructure feasibility study