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**VIA FEDERAL EXPRESS  
& ELECTRONIC SUBMISSION**

Edward M. Dumas, Vice President-Market  
Development & Public Affairs  
Long Island Rail Road Expansion Project  
MTA Long Island Rail Road, MC 1131  
Jamaica Station Building  
Jamaica, New York 11435

The Long Island Rail Road Expansion Project  
(Floral Park to Hicksville)

Dear Mr. Dumas:

I am the Mayor of the Village of New Hyde Park (“New Hyde Park”). These comments are being submitted on behalf of New Hyde Park in response to the MTA/Long Island Rail Road’s (“MTA”) Expansion Project Draft SEQRA Scoping Document. These comments are intended to assist the MTA in considering the project and in preparing all necessary environmental documents so that both the MTA and the public may properly evaluate any proposal to the main line corridor.

It is respectfully suggested that the MTA give significant weight and attention to the comments which follow.

**A. SEQRA**

1. The purpose of SEQRA is to assure that social, economic and environmental factors are considered before reaching a decision on proposed actions that may impact the environment. This requires agencies to assess the environmental significance of all actions they have discretion to approve, fund or directly undertake.
2. In order for the SEQRA process to function properly, full cooperation is required amongst the project sponsor, lead agency, involved agencies and interested agencies. Crucial to this process is transparency and meaningful public participation.

3. The project is titled “Long Island Rail Road Expansion Project”, focusing on the construction and installation of a third track. However, the draft scoping document is devoid of any mention, depiction and discussion of the third track location or placement. Such information is crucial in order for the public to meaningfully review and comment on the potential environmental impacts (cumulative or otherwise).
4. Meaningful public participation can only be accomplished if and when a more detailed scoping document is prepared and disseminated describing the project in its entirety. Such a document must include project specifics as it relates to the construction and installation of the third track, infrastructure and an analysis of the cumulative environmental impacts of same.
5. An opportunity for meaningful public participation requires that the public have sufficient time to involve itself in the scoping process. Given the nature of this project, a five week period for review, analysis and comment is insufficient.
6. Full transparency and a desire on the part of the MTA to fully engage the public in the SEQRA process (as mandated by statute) is unclear when the project sponsor and lead agency are one in the same. Set forth the reason(s) that the Federal Transportation Authority does not have any oversight over the proposed project.
7. Finally, in order to have a meaningful discussion and full understanding of the cumulative impacts of the proposed project, the Village should have access to all of the public comments entered into the record.

## **B. Project Details**

1. All of the proposed project details must be identified and circulated to the public.

Specifically, the MTA needs to do the following:

- a. Identify the differences between the proposed project and that of ten (10) years ago;
- b. Identify the actual location of the proposed third track for the entire project;
- c. Identify any and all proposed infrastructure (i.e. parking fields, parking garages, relocated/reconstructed station platforms, signals and signal houses);
- d. Identify the drainage plan during construction, especially at all proposed grade crossing eliminations;
- e. Identify the drainage plan following construction, especially at all proposed grade crossing eliminations;
- f. Identify the actual boundaries of the LIRR “right of way” and explain why it was not originally included in the Draft Scoping Document;

- g. Identify the easements (permanent and/or temporary) that will be necessary during and after construction;
- h. Identify a realistic timeline for construction based upon past project experience
- i. Identify the proposed hours for construction;
- j. Identify the sequencing of construction for the entire project;
- k. Identify the locations where construction will be staged for the entire project;
- l. Identify how emergency services will be affected before, during and after construction;
- m. Identify the mitigation measures that will be in place to ensure that the proposed project will not result in soil or water contamination. Specifically, the MTA needs to identify the existence of any toxic or harmful materials existing or proposed;
- n. Identify the communities that will comprise the project study area for the cumulative impacts of the proposed project;
- o. Set forth the methodologies to be employed in order to identify and mitigate the traffic impacts resulting during and after construction of the proposed project. Anything exceeding “a low level of tolerance” is unacceptable;
- p. Inasmuch as increased ridership on the LIRR will result from the proposed project, projected parking requirements in New Hyde Park for such ridership should be identified and a plan for mitigating such increased parking should be developed;
- q. Identify the noise study that will be conducted to review the impacts during and after construction of the proposed project. Further, identify the natural screening to be removed on 7<sup>th</sup> Avenue, 6<sup>th</sup> Avenue and 5<sup>th</sup> Avenue and provide the proposed screening/shielding to replace same;
- r. Identify the vibration study that will be conducted to review the impacts during and after construction of the proposed project;
- s. Identify the economic study that will be conducted to review the impacts upon property owners and businesses during and after construction;
- t. Identify the impacts to businesses as a result of the closure of Covert Avenue. A careful analysis of projected impacts upon businesses must be made and a plan for

preserving business operations during construction and thereafter must be formulated;

- u. If advancement of the proposed project will result in any loss of assessed valuation by the Village, do to takings and/or property devaluations, a method to compensate New Hyde Park and property owners on a permanent basis for such losses must be devised;
  - v. Identify the reason(s) the proposed project was not discussed in the MTA Capital Program 2015-2019;
  - w. Identify the funding source for the proposed project and contingency financing;
  - x. Identify the impacts the proposed project will have on existing LIRR Branches/Scheduling (i.e., Hempstead Branch, Oyster Bay Branch and Port Jefferson Branch);
  - y. Identify the data obtained or study conducted with respect to the “reverse commute”; and
  - z. Identify the cumulative impacts of the project with respect to land use, the character of the community and noise.
2. Freight cargo
- a. There currently exists a certain level of freight traffic on the LIRR main line. A careful analysis of the current level of railroad freight traffic through the Village should be made and an evaluation of the potential for a future increase in freight traffic should be performed. Although the potential for increased freight traffic is dismissed in the Draft Scoping Document, an evident by-product of the project is the potential for increased freight travel in the future. The impacts must be identified and carefully considered.
  - b. Identify any agreements, contracts, regulations and restrictions regarding freight cargo on the main line; and
  - c. Identify the rail priority of freight on the main line, specifically in the case when tracks/signals are down.
3. Alternatives
- a. Identify all available alternatives to achieve the intended purpose of the proposed project. Specifically, a cost benefit analysis should consider the relative impacts of other initiatives that would improve service reliability at a lower cost and impact to local communities. These initiatives include:

- i. Construction of a new passenger train yard in Huntington for the westbound commute, thereby reducing the need to deadhead eastbound trains.
  - ii. Electrify the Port Jefferson branch;
  - iii. Complete the second track into Ronkonkoma;
  - iv. Grade crossing eliminations that do not adversely affect local communities. As previously stated, a partial elevation and partial depression would allow the roadways to remain active and would be less disruptive to traffic flow;
  - v. Correct the Jamaica Crawl by upgrading problematic switches;
  - vi. Complete East Side Access into Grand Central Terminal; and
  - vii. High speed signaling switches in conjunction with the LIRR system.
- b. Identify if any alternatives will include elements of phasing, such as bifurcating the project;
  - c. Identify the general impacts of phasing; and
  - d. A realistic time-line for completion of each phase (including "down-time" in between any phases) must be developed so that a realistic assessment of impacts may be made.

### **C. Conclusion**

New Hyde Park is a community bisected by the main line of the Long Island Rail Road and has three (3) at-grade crossings. Traffic flow, development and the overall functionality of the community have been greatly affected by this fact, not to mention the compromise to safety that is created with all at-grade crossings. While the Village recognizes the potential benefits and significance of a project which includes the elimination of these grade crossings, it is extremely cautious about the overall cumulative impacts to our community resulting from such an undertaking and questions whether the benefits, if any, will outweigh such impacts.

New Hyde Park is a special village. The residents of the Village strive to preserve and promote a quality of life which focuses upon safety, security, fine homes, manicured lawns, uncluttered roads, culture, recreation, education and a sense of community. Any project proposed for New Hyde Park must also protect and promote that quality of life.

New Hyde Park is also special as a business community. The business owners and professionals in the Village are committed to complementing the residential community in promoting the Village as a wonderful place to visit or in which to live or work.

It is urged that the environmental review of the proposed Expansion Project take into consideration and share in, at every phase and in every category of review, the promotion of the dearly-held values of the New Hyde Park community.

Commentary upon the Draft Scoping Document without a complete presentation of a potential design for the proposed project is a very difficult chore. As a result, it is suggested that the MTA rescind the current Draft Scoping Document and issue a complete and proper document which addresses all aspects of the project.

Respectfully submitted,

Robert Lofaro  
Mayor