A. INTRODUCTION

In accordance with the State Environmental Quality Review Act (SEQRA), this chapter presents and analyzes alternatives to the Proposed Project. Alternatives selected for consideration in an EIS are generally those that are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of the action.

This chapter considers the following four alternatives to the Proposed Project: [1]

- **No Action Alternative**: SEQRA requires an analysis of a No Action Alternative (i.e., a future condition without the Proposed Project), which for this analysis assumes that the existing uses on the Project Sites would continue;
- **No Unmitigated Impact Alternative**: This analysis considers a development that would not result in any identified significant, adverse impacts that could not be fully mitigated;
- **No Arena Alternative**: This alternative represents a smaller scaled project and contemplates the Proposed Project but without an arena;
- **Alternate Site Plan Alternative**: This alternative contemplates the Proposed Project under the site plan that has not been selected as the preferred option (i.e., Option 1 as presented in the Draft Scope). Site A would include: the proposed arena; the hotel; all of the retail and office space; approximately 1.2 acres of publicly accessible open space; and approximately 1,339 parking spaces. Site B would include: the community space; approximately 6.1 acres of publicly accessible open space; and approximately 2,360 spaces of at-grade parking. Sites A and B would be connected by two pedestrian bridges.

PRINCIPAL CONCLUSIONS

NO ACTION ALTERNATIVE

Consideration of the No Action Alternative is mandated by SEQRA and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part. No changes in use are anticipated for the Project Sites under the No Action

[1] As described in Chapter 1, "Project Description," at the time of the issuance of the Final Scope, it was anticipated that Site B would include two levels of new structured parking below the proposed retail uses, and visitors to the Proposed Project would also utilize parking at Belmont Park in the North Lot and South Lot. The Final Scope included an alternative to the Proposed Project—the South Lot Structured Parking Alternative—that contemplated only one level of structured parking below the proposed retail uses on Site B, shifting 1,500 parking spaces from Site B to a new structured parking garage on the South Lot. However, the Proposed Project has since been modified to be consistent with the alternative described in the Final Scope, except instead of shifting 1,500 parking spaces from Site B to a new structured parking garage on the South Lot, the Proposed Project would shift these spaces to the East Lot. The South Lot Structured Parking Alternative described in the Final Scope is therefore no longer under consideration, and is not included in this chapter.

Alternative. Site A would continue to be used for parking related to Belmont Park Racetrack and its associated activities and events, as well as for staging special events. Site B would continue to be used for parking related to Belmont Park Racetrack and its associated activities and events, and for vehicle storage. The other directly affected areas (including the North, South and East Lots and the area of the proposed electrical substation) would continue in their current conditions.

The significant adverse impacts anticipated for the Proposed Project would not occur with the No Action Alternative. Specifically, traffic, bus service, parking (potential), and construction-period traffic and noise impacts identified for the Proposed Project would not occur under the No Action Alternative. However, the No Action Alternative would not meet the State's development objectives for the Project Sites. Specifically, it would not create a gateway to Long Island by creating a striking new presence for Elmont, transforming the current vacant and underutilized space on the Project Sites to the benefit of the community. It would not create a premier destination by providing a year-round retail village, office space, community space, hotel, and arena, all of which would complement Belmont Park, enhancing economic benefit in comparison with the current underutilized character of the Project Sites. The No Action Alternative would not create approximately 3,000 permanent jobs and over 10,000 temporary construction jobs, including direct and indirect jobs. It would not provide a new and permanent home for the New York Islanders; the Proposed Project's new arena is expected to attract a wide audience of new and existing fans. Overall, unlike the Proposed Project, the No Action Alternative would not benefit the local community by providing new entertainment offerings, retail, hospitality, community space, on- and off-site open space improvements, and substantial employment opportunities that can be locally accessed by adjacent communities.

NO UNMITIGATED IMPACT ALTERNATIVE

This alternative considers development that would not result in any identified significant adverse impacts that could not be fully mitigated. The DEIS analyses identified significant adverse traffic and construction noise impacts for which there are no practicable mitigation measures.

Because of existing congestion and physical constraints at the intersection of Hempstead Avenue at Springfield Boulevard, even a minimal increase in project-generated traffic would trigger a significant adverse traffic impact that could not be fully mitigated. Thus, no reasonable alternative could be developed to completely avoid unmitigated traffic impacts without substantially compromising the stated goals of the Proposed Actions. Additionally, any development on Project Site B that would require excavation and foundation construction would have the potential to result in unmitigated significant adverse construction noise impacts. To eliminate all unmitigated significant adverse impacts, the Proposed Project would have to be reduced in size or modified to a point where it would not meet the State's development objectives for the Project Sites. Accordingly, there is no viable unmitigated impact alternative.

NO ARENA ALTERNATIVE

This alternative represents a smaller-scaled project that would develop the elements of the Proposed Project but without an arena on Project Site A. Site A would be developed with the same hotel, office, "experiential" retail and food and beverage uses, community space, and open space as the Proposed Project.

Like the Proposed Actions, the No Arena Alternative would not result in significant adverse impacts with respect to: land use, zoning, and community character; community facilities and utilities; open space and recreational resources; historic and cultural resources; visual resources;

socioeconomic conditions; hazardous materials; water resources; natural resources; LIRR service; pedestrian circulation; air quality; and noise.

The No Arena Alternative would eliminate the impact to bus service that would occur with the Proposed Project. With respect to operational traffic and construction traffic and noise, the No Arena Alternative may lessen, but not eliminate those impacts. While both the No Arena Alternative and Proposed Project would result in unmitigated traffic and construction noise impacts, one of the two unmitigated impacts to the local street network would be eliminated under the No Arena Alternative.

The overarching goals of the State for the Belmont Park property are to foster economic development and increase activity at Belmont Park with uses that are compatible with the Racetrack and the surrounding neighborhoods. The proposed new uses under the No Arena Alternative would activate sites that are used only on a sporadic basis over the course of a year, but to a lesser extent than the Proposed Project. While this alternative would transform the current vacant and underutilized space on the Project Sites with new uses, without an arena, it would be less of a premier destination for entertainment, sports, hospitality, and retail uses that are complementary to the existing Belmont Park Racetrack. It also would not provide a new and permanent home for the New York Islanders; the Proposed Project's new arena is expected to attract a wide audience of new and existing fans. The No Arena Alternative would not create as many permanent and temporary construction jobs as the Proposed Project. In addition, this alternative would not realize any of the other economic benefits associated with construction and operation of a multi-purpose arena serving as a professional hockey venue, and hosting major concerts, college sports, conferences, and family events. Overall, this alternative would not substantially avoid or reduce project-related significant adverse impacts, and would be less effective in meeting the State's development objectives for the Project Sites.

ALTERNATE SITE PLAN ALTERNATIVE

At the time of the issuance of the Draft Scope for the DEIS, two site plan options were under consideration for the Project Sites: Site Plan Options 1 and 2. The primary difference between the two options was the allocation of the proposed retail uses across Sites A and B. Site Plan Option 1 would locate all of the proposed retail uses on Site A with the proposed arena, hotel, and office uses, while Site Plan Option 2 would locate the proposed retail village on Site B. Site Plan Option 2 was selected as the preferred site plan, and it is the basis for the Proposed Project. This Alternate Site Plan Alternative reflects Site Plan Option 1.

Like the Proposed Actions, the Alternate Site Plan Alternative would not result in significant adverse impacts with respect to: land use, zoning, and community character; community facilities and utilities; open space and recreational resources; historic and cultural resources; visual resources; socioeconomic conditions; hazardous materials; water resources; natural resources; LIRR service; pedestrian circulation; air quality; and noise.

Like the Proposed Project, the Alternate Site Plan Alternative would result in significant adverse operational traffic and bus service impacts, as well as significant adverse construction traffic and noise impacts. As the Alternate Site Plan Alternative would have the same program as the Proposed Project, it would have similar traffic and bus impacts, with minor differences accounting for variations in travel patterns and directionality of trips in the immediate vicinity of the Project Sites. It is expected that the same unmitigated adverse traffic impacts would occur under this alternative.

With respect to construction noise, the Alternate Site Plan Alternative would eliminate the significant adverse construction noise impact at Wellington Road (west side, between 109th Avenue and Hathaway Ave) that would occur with the Proposed Project. Other residences immediately adjacent to Site B would experience significant adverse noise effects of a similar magnitude but for a shorter duration compared with the Proposed Project.

The Alternate Site Plan Alternative would meet the State's development objectives for Project Site A, but less so for Project Site B. Similar to the Proposed Project, this alternative would transform Site A, an underutilized site, into a vibrant, year-round operating and accessible mixed-use development that would be compatible with the surrounding area. The Alternate Site Plan Alternative would develop Site B with less intensive uses than with the Proposed Project, and these would also be compatible with the surrounding area. However, with Site B developed primarily with parking and open space uses, this alternative would not generate comparable levels of vibrancy and economic activity south of Hempstead Turnpike. Additionally, the Applicant is confident that the Proposed Project's layout would better maximize the economic potential of the Project Sites as compared to this alternative. Overall, this alternative would not substantially avoid or reduce project-related significant adverse impacts, and would be less effective in meeting the State's development objectives for the Project Sites.

B. NO ACTION ALTERNATIVE

Consideration of the No Action Alternative is mandated by SEQRA and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part. No changes in use are anticipated for the Project Sites under the No Action Alternative. Site A would continue to be used for parking related to Belmont Park Racetrack and its associated activities and events, as well as for staging special events. Site B would continue to be used for parking related to Belmont Park Racetrack and its associated activities and events, and for vehicle storage.

The other directly affected areas (including the North, South and East Lots and the area of the proposed electrical substation) would continue in their current conditions: to accommodate visitor parking (South Lot); to accommodate occasional parking demand from large events such as Belmont Stakes day and for the storage of vehicles (North and East Lots); and to store truck trailers (the electrical substation area). Additionally, the geometric and signal phasing improvements that would be implemented at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road as part of the Proposed Actions would not occur under the No Action Alternative.

Conditions under the No Action Alternative as compared with the future with the Proposed Project are summarized below.

LAND USE, ZONING, AND COMMUNITY CHARACTER

Neither the No Action Alternative nor the Proposed Project would result in any significant adverse impacts to land use, zoning, or community character.

Under the No Action Alternative, the land use of the Project Sites would not be altered, and the development objective set forth by New York State—enhancing Belmont Park to become one of Long Island's premier destinations for sports, entertainment, hospitality, and retail with uses that are complementary to the existing Racetrack and associated facilities—would not be met. The Project Sites would continue to be used sporadically over the course of a year, and unlike with the Proposed Project, the No Action Alternative would not draw the surrounding community onto the Belmont Park property through new economic and social opportunities. It would not transform

two underutilized sites into a vibrant, year-round operating and accessible mixed-use development that would be compatible with the existing Belmont Park uses and the surrounding area. The No Action Alternative, similar to the Proposed Project, would not result in changes to land uses in the study area.

Unlike the Proposed Project, the No Action Alternative would not introduce land uses at a density and height greater than is permitted in the surrounding area, and therefore would not require overrides of the Town of Hempstead Building Zone Ordinance (BZO) for zoning parameters such as principal and accessory uses, height, density, coverage and setbacks, and parking, or overrides of other sections of the Town of Hempstead Town Code (e.g., signage, lighting, stormwater management, fencing).

Unlike the Proposed Project, the No Action Alternative would not be consistent with public policy at a local, County, and State level looking to harness the prominence of Belmont Park to spur economic development and to create an important gateway to Long Island.

COMMUNITY FACILITIES AND UTILITIES

As with the Proposed Actions, the No Action Alternative would not result in significant adverse impacts to community facilities and utilities.

The Fifth Precinct of the Nassau County Police Department (NCPD) and various plainclothes and specialized resources would continue to service Belmont Park under the No Action Alternative. The Elmont Fire Department and the Nassau County Police Medic Emergency Ambulance Bureau (EAB) would also continue to provide services on an as-needed basis.

Under the No Action Alternative, no changes in use are anticipated for the Project Sites or other directly affected areas. Therefore, unlike with the Proposed Project, the No Action Alternative would not result in new generation of solid waste, and total sewage generation and water demand would be expected to be the same as in existing conditions. No major changes with respect to electrical service or natural gas service would be required under this alternative. However, there were no impacts anticipated due to the new generation of solid waste from the Proposed Project.

As with the Proposed Project, the No Action Alternative would have no direct impacts on schools, day care facilities, libraries and hospitals (including no displacement of such facilities). In addition, like the Proposed Project, since there would be no permanent population generated by the No Action Alternative, there would be no indirect impact on schools, libraries, day care facilities, and hospitals.

OPEN SPACE AND RECREATIONAL RESOURCES

Neither the No Action Alternative nor the Proposed Project would result in significant adverse impacts to publicly accessible open space or recreational resources.

Unlike the Proposed Project, the No Action Alternative would not displace a substantial portion of the Belmont Park Backyard—used by Belmont Park employees and New York Racing Association (NYRA) invitees who pay the entry fee to access the Backyard to participate in betting and other racing-related activities in a family-oriented green space setting. However, under this alternative, the approximately 2.0 acres of hard- and soft-scaped plazas on Site A, and an approximately 3.75-acre landscaped open space on Site B, would also not be developed. With the Proposed Actions, these new open spaces would be open to the public free of charge, and would not require an entry fee which is currently required to access the Backyard. Under the No Action Alternative, since these new open spaces would not be developed, access to the Belmont Park

Backyard would continue to require an entry fee. In addition, with the Proposed Actions, the Applicant has committed to implementing improvements to existing open space in the nearby community. Under the No Action Alternative, these improvements would not occur. Similar to the Proposed Project, the No Action Alternative would not preclude the ongoing use of existing open space resources at Belmont Park by Floral Park Memorial High School students.

As with the Proposed Project, the No Action Alternative would not result in any significant adverse impacts on open space resources from air quality, noise or shadows.

Unlike the Proposed Project, the No Action Alternative would not introduce new worker and visitor populations to the Project Sites, and open spaces directly adjacent to Belmont Park—including the Belmont Bench Spread, Belmont Ball Park, and Hendrickson Avenue Park. While increased utilization at these open spaces would not be substantial with the Proposed Project (as access to these spaces from Belmont Park is limited along Hempstead Turnpike, and the proposed on-site amenities would support the recreational needs of workers and visitors), there would be no increase under the No Action Alternative.

HISTORIC AND CULTURAL RESOURCES

Neither the No Action Alternative nor the Proposed Project would result in significant adverse impacts to historic and cultural resources.

Under the No Action Alternative, no changes in use are anticipated for the Project Sites or other directly affected areas. Sites A and B would continue to be used for occasional parking related to Belmont Park and its associated activities and events, and the North, South, and East Lots and the area of the proposed electrical substation (the other directly affected areas) would continue in their current uses. Neither the Proposed Project nor the No Action Alternative would have the potential to adversely impact archaeological resources. In a letter dated August 10, 2018 and subsequent comments dated October 15, 2018, OPRHP indicated that they have no archaeological concerns with respect to the Project Sites or the other directly affected areas.

The Project Sites and other directly affected areas do not include architectural resources. Therefore, as with the Proposed Project, there would be no potential for the No Action Alternative to impact architectural resources on these sites. Further, the No Action Alternative, like the Proposed Actions, would not result in any significant adverse impacts—physical or contextual—to architectural resources in the study area.

VISUAL RESOURCES

Under the No Action Alternative, there would be no change within the Project Sites and other directly affected areas, and no change to any existing view corridors and visual resources. Like the Proposed Project, the No Action Alternative would not result in significant adverse impacts to aesthetic resources in the study area; would not impinge on viewsheds of the aesthetic resources; and would not interfere with the public's enjoyment of Floral Park Bellerose School and other historic resources in the study area, as well as local parks including Hempstead Ballfield, Hempstead Bench Spread, and Pat Williams Playground.

SOCIOECONOMIC CONDITIONS

As with the Proposed Project, the No Action Alternative would not result in any significant adverse impacts due to changes in socioeconomic conditions. However, compared with the Proposed Actions, the No Action would not create new economic opportunities during construction and operational periods.

As with the Proposed Actions, the No Action Alternative, would have no direct or indirect displacement of any residents or businesses (but under this alternative, the existing use of car storage on Site B or the North and East Lots would not be eliminated). As with the Proposed Project, there would be no direct displacement of businesses, but under this alternative, the existing business use of car storage (on Site B and the North and East Lots) would remain.

HAZARDOUS MATERIALS

Neither the Proposed Project nor the No Action Alternative would result in significant adverse impacts with respect to hazardous materials. Under the No Action Alternative, there would be no subsurface disturbance of the Project Sites or other directly affected areas and thus no potential for exposure to any subsurface contamination that might be present. Unlike the Proposed Project, the implementation of measures to reduce the potential for exposure to any hazardous materials that may be present would not be needed.

WATER RESOURCES

Like the Proposed Project, the No Action Alternative would not result in significant adverse impacts to water resources. With no changes in use for the Project Sites or other directly affected areas, with this alternative there would be no direct impact to groundwater resources or stormwater runoff. The existing drainage system would continue to function as it does today, with routine maintenance by NYRA staff to keep it functional. Unlike the Proposed Project, the No Action Alternative would not enhance existing stormwater runoff conditions by decreasing the amount of impervious surface on the Project Sites. Similarly, the No Action Alternative would not implement stormwater controls on the North and East Lots, which under the Proposed Actions, would have a positive effect on the stormwater runoff in these areas.

NATURAL RESOURCES

Like the Proposed Project, the No Action Alternative would not result in any significant adverse impacts with respect to natural resources. Under the No Action Alternative, natural resources within the Project Sites and other directly affected areas would be expected to remain the same, as there would be no new development in these areas. Unlike the Proposed Project, this alternative would not result in the loss of a number of mature trees that provide habitat for birds and other wildlife typical of developed areas; however, it would not provide the new landscaping of the Proposed Project, including the approximately 3.75 acres of landscaped open space and tree plantings on Site B, which has the potential to improve habitats for birds and pollinator species, as well as other wildlife within the Project Sites.

TRANSPORTATION

Unlike the Proposed Actions, the No Action Alternative would not result in any significant adverse impacts with respect to transportation.

TRAFFIC

Local Street Network

Unlike the Proposed Actions, the No Action Alternative would not result in significant adverse traffic impacts to eleven intersections during one or more analyzed peak hours as discussed below.

- Under the No Action Alternative, during the weekday AM peak hour, one intersection would operate at overall LOS E or F, similar to the Proposed Actions, and three fewer traffic movements would operate at LOS E or F than under the Proposed Actions. The five

intersections that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.

- Under the No Action Alternative, during the weekday PM peak hour, one less intersection would operate at overall LOS E or F than under the Proposed Actions, and three fewer traffic movements would operate at LOS E or F than under the Proposed Actions. The six intersections that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.
- Under the No Action Alternative, during the Saturday Midday peak hour, five fewer intersections would operate at overall LOS E or F than under the Proposed Actions, and five fewer traffic movements would operate at LOS E or F than under the Proposed Actions. The nine intersections that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.
- Under the No Action Alternative, during the Saturday PM peak hour, two fewer intersections would operate at overall LOS E or F than under the Proposed Actions, and one less traffic movement would operate at LOS E or F than under the Proposed Actions. The six intersections that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.
- Under the No Action Alternative, during the Saturday night peak hour, one less intersection would operate at overall LOS E or F than under the Proposed Actions, and three fewer traffic movements would operate at LOS E or F than under the Proposed Actions. The three intersections that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.

As discussed in Chapter 11, "Transportation," if night racing is approved by the New York State Legislature, NYRA may add night racing at Belmont Park one or two nights during some of the weeks of the Spring and Fall Meets. This could result in additional congestion at certain intersections during the weekday PM, Saturday PM, and/or Saturday night peak hours under the No Action Alternative on evenings when live racing is held.

Highway Network

Unlike the Proposed Actions, the No Action Alternative would not result in significant adverse impacts to 34 highway segments along the Cross Island Parkway between the Southern State Parkway and Jamaica Avenue during one or more analyzed peak hours as discussed below.

- Under the No Action Alternative, during the weekday AM peak hour, two fewer highway segments would operate at LOS E or F than under the Proposed Actions. The six highway segments that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.
- Under the No Action Alternative, during the weekday PM peak hour, 12 fewer highway segments would operate at LOS E or F than under the Proposed Actions. The 15 highway segments that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.
- Under the No Action Alternative, during the Saturday Midday peak hour, 23 fewer highway segments would operate at LOS E or F than under the Proposed Actions. The 24 highway segments that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.

- Under the No Action Alternative, during the Saturday PM peak hour, 14 fewer highway segments would operate at LOS E or F than under the Proposed Actions. The 22 highway segments that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.
- Under the No Action Alternative, during the Saturday night peak hour, 15 fewer highway segments would operate at LOS E or F than under the Proposed Actions. The 21 highway segments that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.

Unlike the Proposed Actions, the No Action Alternative would not result in significant adverse traffic impacts to three merge and weaving segments at interchanges of the Cross Island Parkway with the Long Island Expressway and Grand Central Parkway during one or more analyzed peak hours as discussed below.

- Under the No Action Alternative, during the weekday AM peak hour, one merge segment would operate at LOS E or F, similar to the Proposed Actions. Neither the No Action Alternative nor the Proposed Actions would result in significant adverse traffic impacts to merge or weaving segments.
- Under the No Action Alternative, during the weekday PM and Saturday night peak hours, no merge or weaving segments would operate at LOS E or F, similar to the Proposed Actions. Neither the No Action Alternative nor the Proposed Actions would result in significant adverse traffic impacts to merge or weaving segments.
- Under the No Action Alternative, during the Saturday Midday peak hour, two fewer merge or weaving segments would operate at LOS E or F than under the Proposed Actions. The one weaving segment that would experience a significant adverse traffic impact under the Proposed Actions would not experience this impact under the No Action Alternative.
- Under the No Action Alternative, during the Saturday PM peak hour, no merge or weaving segments would operate at LOS E or F, similar to the Proposed Actions. The two merge segments that would experience significant adverse traffic impacts under the Proposed Actions would not experience those impacts under the No Action Alternative.

As discussed in Chapter 11, "Transportation," if night racing is approved by the New York State Legislature, NYRA may add night racing at Belmont Park one or two nights a week during the Spring and Fall Meets. This could result in additional congestion at certain highway segments during the weekday PM, Saturday PM, and/or Saturday night peak hours under the No Action Alternative on evenings when live racing is held.

LIRR SERVICE

Unlike the Proposed Actions, in the No Action Alternative the LIRR Belmont Park Station would remain as a seasonal-use station with train service only provided on days when live racing is held at Belmont Park Racetrack.

BUS SERVICE

Unlike the Proposed Actions, the No Action Alternative would not result in significant adverse impacts to NICE and MTA bus routes which with the Proposed Project, would likely require some increases in bus service during time periods before and after arena events to accommodate bus rider trips made by arena patrons.

PARKING

Unlike the Proposed Actions, in the No Action Alternative the existing parking areas on Sites A and B would not be repurposed and would continue to be used for parking for Racetrack patrons during racing season at Belmont Park only, and portions of Site B would continue to be used for vehicle storage. As with the Project Sites, it is expected that in the No Action Alternative, the North, South and East Lots would continue to accommodate visitor parking (South Lot) and the occasional parking demand from Belmont Stakes day or for the storage of vehicles (North and East Lots). In the No Action Alternative, there would not be a nominal expansion of the paved area used for parking in the East Lot.

PEDESTRIAN CIRCULATION

Unlike the Proposed Actions, under the No Action Alternative one or more grade-separated pedestrian connections would not be constructed across Hempstead Turnpike providing access between the Project Sites.

AIR QUALITY

Under the No Action Alternative, mobile source and stationary source emissions in the vicinity of the Project Sites and other directly affected areas would be similar to existing conditions. Like the Proposed Project, the No Action Alternative would not result in significant adverse impacts related to air quality.

NOISE

Neither the Proposed Project nor the No Action Alternative would result in significant adverse impacts with respect to operational noise. Under the No Action Alternative, no new development would occur on the Project Sites or other directly affected areas that would generate noise at nearby sensitive receptors.

CLIMATE CHANGE

Under the No Action Alternative, no changes in use are anticipated for the Project Sites or other directly affected areas. The No Action Alternative would not contribute incremental emissions of greenhouse gases (GHG), including any off-site emissions associated with use of electricity, on-site emissions from heat and hot water systems, emissions from vehicle use, and emissions that would result from construction. While the Proposed Project would result in an increase in GHG emissions, it would be consistent with the decreased energy use goals as defined in the *Climate Smart Communities Pledge* as part of the Town of Hempstead's GHG reduction goal.

CONSTRUCTION

Under the No Action Alternative, it is expected that existing uses within the Project Sites and other directly affected areas would remain. Therefore, unlike with the Proposed Actions this alternative would not result in the construction-period transportation and noise impacts predicted with the Proposed Project. With the No Action Alternative, there would be no need for measures to be undertaken during construction to minimize the effects of the Proposed Project on the nearby community, including those related to communication with the community, community safety, and environmental performance.

CONCLUSIONS

The significant adverse impacts anticipated for the Proposed Project would not occur with the No Action Alternative. Specifically, traffic, bus service, parking (potential), and construction-period traffic and noise impacts identified for the Proposed Project would not occur under the No Action Alternative. However, the No Action Alternative would not meet the State's development objectives for the Project Sites. Specifically, it would not create a gateway to Long Island by creating a striking new presence for Elmont, transforming the current vacant and underutilized space on the Project Sites to the benefit of the community. It would not create a premier destination by providing a year-round retail village, office space, community space, hotel, and arena, all of which would complement Belmont Park, enhancing economic benefit in comparison with the current underutilized character of the Project Sites. The No Action Alternative would not create approximately 3,000 permanent jobs and over 10,000 temporary construction jobs, including direct and indirect jobs. It would not provide a new and permanent home for the New York Islanders; the Proposed Project's new arena is expected to attract a wide audience of new and existing fans. Overall, unlike the Proposed Project, the No Action Alternative would not benefit the local community by providing new entertainment offerings, retail, hospitality, community space, on- and off-site open space improvements, and substantial employment opportunities that can be locally accessed by adjacent communities.

C. NO UNMITIGATED IMPACT ALTERNATIVE

This alternative considers development that would not result in any identified significant adverse impacts that could not be fully mitigated. The DEIS analyses identified significant adverse traffic and construction noise impacts for which there are no practicable mitigation measures. Modifications to the Proposed Project that would eliminate these unmitigated significant impacts are examined below.

The assessment focuses only on the technical analyses mentioned above. There are no summary comparative assessments for technical analyses where there were no significant adverse impacts or where such impacts were fully mitigated for the Proposed Project.

TRAFFIC

The Proposed Actions would result in significant adverse traffic impacts at 11 study area intersections in the local street network during one or more analyzed peak hours: at five intersections during the weekday AM peak hour; six intersections during the weekday PM peak hour; nine intersections during the Saturday Midday peak hour; six intersections during the Saturday PM peak hour; and three intersections during the Saturday night peak hour. Implementation of traffic engineering improvements, such as the modification of traffic signal timing and/or phasing, installation of new traffic signals, use of Traffic Enforcement Agents (TEAs) to improve traffic operations for intersection approaches experiencing congestion before and after arena events, lane re-striping and lane designation changes, and widening of intersection approaches would provide mitigation for nearly all of the anticipated traffic impacts to the local street network. Specifically, the significant adverse impacts would be fully mitigated at all but two intersections: Hempstead Avenue at Springfield Boulevard during the weekday AM peak hour and Hempstead Avenue at 225th Street during the Saturday Midday peak hour.

Because of existing congestion and physical constraints at the intersection of Hempstead Avenue at Springfield Boulevard, even a minimal increase in project-generated traffic would trigger a significant adverse traffic impact that could not be fully mitigated. Based on a sensitivity analysis

for this intersection, it was determined that the addition of vehicle trips generated by just 20 percent of the density of the Proposed Project during the weekday AM peak hour (which does not include any trips associated with the arena) would result in a significant adverse traffic impact that could not be fully mitigated. This level of traffic increase would result from almost any significant new development on the Project Sites, thus no reasonable alternative could be developed to completely avoid unmitigated traffic impacts without substantially compromising the stated goals of the Proposed Actions.

CONSTRUCTION NOISE

Any development on Project Site B that would require excavation and foundation construction would have the potential to result in unmitigated significant adverse noise impacts at outdoor areas (e.g., yards, decks) of residences along Huntley Road, both sides of Wellington Road between Hempstead Turnpike and 109th Avenue, the west side of Wellington Road between 109th Avenue and Hathaway Avenue, and the north side of Hathaway Avenue west of Wellington Road. This limitation would preclude development of any building/structure on this site under this alternative.

CONCLUSIONS

Because of existing congestion and physical constraints at the intersection of Hempstead Avenue at Springfield Boulevard, even a minimal increase in project-generated traffic would trigger a significant adverse traffic impact that could not be fully mitigated. Thus no reasonable alternative could be developed to completely avoid unmitigated traffic impacts without substantially compromising the stated goals of the Proposed Actions. Additionally, any development on Project Sites A or B that would require excavation and foundation construction would have the potential to result in unmitigated significant adverse construction noise impacts.

Based on the above, to eliminate all unmitigated significant adverse impacts, the Proposed Project would have to be reduced in size or modified to a point where it would not meet the State's development objectives for the Project Sites. Accordingly, there is no viable unmitigated impact alternative.

D. NO ARENA ALTERNATIVE

This alternative represents a smaller-scaled project that would develop the elements of the Proposed Project but without an arena on Project Site A. Site A would be developed with the same hotel, office, "experiential" retail and food and beverage uses, community space, and open space as the Proposed Project. This alternative would locate these proposed uses towards the western portion of the site, in place of the arena location under the Proposed Actions. Thus, the eastern boundary of Site A would shift westward, with less encroachment into the Belmont Park Backyard area and a smaller overall Site A footprint as compared with the Proposed Project. As with the Proposed Project, Project Site B would be developed with a retail village and open spaces. Site A would include approximately 400 spaces in new structured parking in the hotel's podium, and Site B would include approximately 1,500 spaces on one level of new structured parking beneath the retail village. [2]

[2] Site A would include up to 135,000 gsf of "experiential" retail and food and beverage uses; and Site B would include up to 350,000 gsf of luxury outlet stores within a "retail village." The total amount of retail would add up to an overall maximum of 435,000 gsf of retail across the entire development.

As with the Proposed Project, visitors to the Project Sites under the No Arena Alternative would also utilize existing parking at Belmont Park in the South and East Lots through a shared parking agreement with the Franchise Oversite Board (FOB) and NYRA. However, unlike the Proposed Project, it is assumed that North Lot would not be utilized by visitors to the Project Sites, and the surface lot improvements that would be implemented as part of the Proposed Project would not be required. It is also assumed that an electrical substation would be constructed under the No Arena Alternative to serve the hotel, office, retail and community space on Site A and the retail village on Site B.

Similar to the Proposed Actions, the No Arena Alternative would include the implementation of signal phasing improvements at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road; however, the geometric improvements at this intersection that would be implemented under the Proposed Actions would not be implemented under the No Arena Alternative.

Conditions under the No Arena Alternative as compared with the future with the Proposed Actions are summarized below.

LAND USE, ZONING AND COMMUNITY CHARACTER

Neither the No Arena Alternative nor the Proposed Project would result in any significant adverse impacts to land use, zoning, or community character.

Both the No Arena Alternative and the Proposed Project would transform the Project Site from an underutilized site containing parking facilities to a higher density, mixed-use development; however, the density of development would be less under the No Arena Alternative than under the Proposed Project.

As with the Proposed Project, the No Arena Alternative would result in a substantial change to the existing land use and character of Sites A and B, while the South and East Lots would be used more frequently for active parking as compared to its current use for the storage of vehicles and overflow parking for the annual Belmont Stakes. Unlike the Proposed Project, the North Lot would remain in its existing condition under this alternative. Similar to the Proposed Project, zoning overrides of the Hempstead BZO and Hempstead Town Code would be sought to effectuate the development of Sites A and B. Under both the Proposed Actions and the No Arena Alternative, the proposed land uses would be compatible with the existing development of the Belmont Park property as a racetrack and entertainment facility, which has been in existence for over 110 years.

The proposed hotel, office, retail, and community uses on the Project Sites would make Belmont Park more of a year-round destination. Similar to the Proposed Project, these uses would draw the surrounding community onto the Belmont Park property through economic and social opportunities. However, unlike the Proposed Project, this alternative would not bring arena patrons for professional hockey games, concerts, college sports, conferences, and family events. Implementation of either the Proposed Project or the No Arena Alternative is not expected to result in a significant adverse land use impact on the surrounding community.

As with the Proposed Project, no change in underlying zoning of the Project Sites would occur under the No Arena Alternative, and it is expected that there would be no impact to the zoning of surrounding areas. The redevelopment of Sites A and B under the Proposed Project and the No Arena Alternative would be consistent with the local, County, and State comprehensive planning documents and policy recommendations, as one of the major goals consistently identified in policy

statements at all levels is for this area to harness the prominence of Belmont Park to spur economic development and to create an important gateway to Long Island.

Both the Proposed Project and the No Arena Alternative would change the character of the Project Sites, but since the core of the surrounding neighborhoods, particularly to the north, are shielded by the existing development at Belmont Park (including the Racetrack itself and the Backstretch area), impacts from development on Site A are not expected to be significant. As with the Proposed Project, under the No Arena Alternative, the retail village shops on Site B would be inward facing and substantially buffered by vegetation, and the impacts to the community directly to the east and south surrounding Site B would be minimized. Vegetation would also buffer any surface parking, interior roadways, and drop-off areas within Site B from the surrounding residential communities.

COMMUNITY FACILITIES AND UTILITIES

Like the Proposed Actions, the No Arena Alternative would not result in significant adverse impacts to community facilities and utilities.

Under the No Arena Alternative, demand for police protection, fire protection and ambulance/emergency medical services would be less than under the Proposed Actions.

As with the Proposed Project, the No Arena Alternative would increase the volumes of solid waste and recyclables on Sites A and B. However, without a proposed arena (the largest contributor to solid waste generation with the Proposed Project), the solid waste demand generated by the No Arena Alternative would be approximately 43 percent less than with the Proposed Project. As with the Proposed Project, under the No Arena Alternative, there would be new solid waste collection on Site B, which is currently only used for parking and vehicle storage, and does not generate solid waste.

Both the Proposed Project and No Arena Alternative would increase water demand and sewage flow; however, without a proposed arena, these would be less under the No Arena Alternative. The Bay Park Wastewater Treatment Plant (WWTP), located in East Rockaway, is operating within its State Pollutant Discharge Elimination System (SPDES) permit capacity and would have the capacity to treat the projected sewage effluent from either the Proposed Project or the No Arena Alternative. Neither the Proposed Project nor the No Arena Alternative would result in a significant adverse impact on sewage disposal infrastructure.

Electrical service is provided by PSEG Long Island. Early in the environmental review process, PSEG Long Island identified the need to construct an electrical substation to adequately serve the Proposed Project. It is assumed that while there would be no electrical load from an arena under the No Arena Alternative, the proposed electrical substation would be constructed to serve the other program elements (hotel, office, retail and community space on Site A and the retail village on Site B). Like the Proposed Project, with the construction of the new electrical substation, feeders, and transmission lines, the electrical supply demands of the No Arena Alternative would be satisfied and, thus, similar to the Proposed Project, no significant adverse impact on electrical services would be anticipated.

As with the Proposed Project, under the No Arena Alternative, the proposed substation would not have a significant adverse impact on neighboring properties due to the distance to the nearest residences and other sensitive receptors (e.g., schools) and, as the proposed feeders and transmission lines would be underground and almost entirely located on Belmont Park property, any increases in EMF levels would not have a significant adverse impact on the surrounding community.

Under the No Arena Alternative, like the Proposed Project, it is likely that Site B, as well as the South and East Lots, would need new, additional or upgraded utility line extensions to handle new and additional lighting within these parking lots. Unlike the Proposed Project, no additional or upgraded utility line extensions would be needed for the North Lot.

Natural gas is provided to the Project Sites and other directly affected areas by National Grid. The natural gas demands of the No Arena Alternative would be less than the demands of the Proposed Project, and like the Proposed Actions, under the No Arena Alternative there would be no significant adverse impact to the natural gas supply.

Like the Proposed Project, the No Arena Alternative would have no direct impacts on schools, day care facilities, libraries and hospitals (including no displacement of such facilities). In addition, since there would be no residential population generated by the No Arena Alternative, there would be no indirect impact due to increased demands on schools, libraries, and day care facilities. Under the No Arena Alternative, there would be less potential demand for area hospitals, but like the Proposed Project, no significant adverse impact would be anticipated.

OPEN SPACE AND RECREATIONAL RESOURCES

Neither the No Arena Alternative nor the Proposed Project would result in significant adverse impacts to publicly accessible open space or recreational resources.

The No Arena Alternative, like the Proposed Project, would introduce new publicly-accessible open spaces to Belmont Park. Without an arena, and a smaller overall Site A footprint, it is assumed that the amount of new open space on Site A would be less than the approximately 2.0 acres of hard- and soft-scaped plazas that would be introduced by the Proposed Project. However, the No Arena Alternative would not require the displacement of the entire 5 acres of Belmont Park Backyard space that would be displaced with the Proposed Project. Under this alternative, it is likely that the children's play area, the picnic area, betting tent, and the man-made water feature would not be displaced and these areas would continue to require an entry fee which is currently required. The NYRA events currently held within the Backyard space are largely expected to continue in the future with the No Arena Alternative, however, unlike with the Proposed Project, these events would likely not need to relocate to other parts of the Belmont Park property. Both the Proposed Project and the No Arena Alternative would include an approximately 3.75-acre landscaped open space with walking paths on Site B, along the southern and eastern boundary.

Under the No Arena Alternative, new plazas on Site A as well as the passive open space proposed for Site B would offset the smaller loss of Belmont Park Backyard space, and would meet the recreational space needs of existing Backyard patrons and new workers and visitors.

Like the Proposed Project, under the No Arena Alternative, it is assumed that NYAP would work with ESD and local officials and community stakeholders, including the Town of Hempstead, to make improvements to existing open space in the nearby community. Elmont Road Park in the Town of Hempstead is currently under consideration.

Neither the Proposed Project nor the No Arena Alternative would result in any significant adverse impacts on open space resources including from air quality, noise, or shadows, either during construction or during event- and non-event day operations. In addition, like the Proposed Project, the No Arena Alternative would not preclude the ongoing use of existing open space resources at Belmont Park by Floral Park Memorial High School students.

The No Arena Alternative would introduce fewer new worker and visitor populations to the Project Sites than the Proposed Project. Similar to the Proposed Project, it is unlikely that new

workers or visitors would utilize open spaces within the communities surrounding Belmont Park, preferring to utilize on-site space at Belmont Park. As with the Proposed Project, new open spaces would be created as part of the No Arena Alternative to accommodate the new on-site populations, as well as the existing Backyard patrons and surrounding communities. These open spaces would offset the incremental demands that the new workers and visitors would place on the existing recreational areas at Belmont Park.

Like the Proposed Project, open spaces directly adjacent to Belmont Park—including the Belmont Bench Spread, Belmont Ball Park, and Hendrickson Avenue Park—may experience some increased utilization by Belmont Park workers and visitors as a result of the No Arena Alternative. However, the increase is unlikely to be substantial, as access to these spaces from Belmont Park is limited along Hempstead Turnpike, and the proposed on-site amenities would support the recreational needs of workers and visitors.

HISTORIC AND CULTURAL RESOURCES

As with the Proposed Project, the No Arena Alternative would not result in significant adverse impacts on historic resources. Like the Proposed Project, the No Arena Alternative would redevelop Project Sites A and B with new uses; the South and East Lots would be resurfaced, restriped, and include new lighting; and a new electrical substation would be constructed adjacent to the North Lot to the west. Unlike the Proposed Project, no improvements would be made to the North Lot.

There are no known or potential archaeological or architectural resources on the Project Sites or within the other directly affected areas, and thus as with the Proposed Project, the No Arena Alternative would not have any direct or indirect impacts to on-site archaeological or architectural resources. There is one known architectural resource in the study area—the Floral Park Bellerose School—that is located approximately 400 feet from the North Lot, separated by a playing field, and thus has visibility to that portion of the directly affected area. Unlike the Proposed Project, because the North Lot would not be improved under the No Arena Alternative, it would not include new fencing, and dense border vegetation along its northeastern boundary. As with the Proposed Project, although Belmont Park is visible in the distance from the Floral Park Bellerose School, the No Arena Alternative would be located far enough away from the school that visibility of its built structures would be insignificant. Therefore, like the Proposed Project, the No Arena Alternative would not have any direct (physical) or indirect (visual/contextual) impacts to architectural resources within the study area.

VISUAL RESOURCES

Like the Proposed Actions, the No Arena Alternative would not result in significant adverse impacts to aesthetic resources in the study area; would not impinge on viewsheds of the aesthetic resources; and would not interfere with the public's enjoyment of Floral Park Bellerose School and other historic resources in the study area, as well as local parks including Hempstead Ballfield, Hempstead Bench Spread, and Pat Williams Playground.

As with the Proposed Project, under the No Arena Alternative, built structures on Site A would be visible from certain aesthetic resources or sensitive view locations in Elmont, Queens Village, and Floral Park; however, these views would not include an arena. As with the Proposed Project, in Elmont, northwest views from residential Huntley Road would be of the upper stories of the hotel, but the views would not be direct and would be partially obscured by vegetation. The views would remain compatible with the street's existing setting, which includes a north view of the Grandstand/Clubhouse. In Queens Village, three public parks near the Cross Island Parkway

would have views of the office/community space development, however, unlike with the Proposed Project, these views would not include an arena. Similarly, under this alternative, views from Hempstead Ballfield, Hempstead Bench Spread, and Pat Williams Playground would include the office/community space, but not an arena. As with the Proposed Project, the No Arena Alternative would be physically separated by the Cross Island Parkway and the grassy area of the Hempstead Turnpike/Cross Island Parkway cloverleaf interchange. In Floral Park, similar to the Proposed Project, views of the No Arena Alternative on Site A would be limited to only the upper stories of the hotel above the Grandstand/Clubhouse. Therefore, like the Proposed Project, the No Arena Alternative on Site A would not result in significant adverse impacts to aesthetic resources in Elmont, Queens Village or Floral Park, as it would not obstruct views to aesthetic resources or otherwise significantly detract from, or cause a diminishment of the public's enjoyment of a resource.

The development proposed on Site B would be the same with the Proposed Project and the No Arena Alternative. Both the Proposed Project and the No Arena Alternative on Site B would be partially visible from Huntley Road and a segment of Wellington Road in Elmont, which are residential streets located adjacent to the site's eastern boundary. A proposed linear open space would be provided on the east side of Site B, with a landscaped berm that would obscure views from Huntley Road of the lower portions of the buildings on Site B. From Wellington Road, the proposed emergency entrance at 109th Avenue would also remain compatible with the street's setting. Neither the Proposed Project nor the No Arena Alternative on Site B would result in any impacts to views to aesthetic resources or diminish the public's enjoyment of a resource, or significantly impact sensitive viewers.

The South and East Lots would be resurfaced, restriped, and illuminated under both the Proposed Actions and the No Arena Alternative. The proposed East Lot would be made more active and may contain small ticketing booths. Unlike the Proposed Actions, the North Lot would not include these improvements, including new dense border vegetation along its northeastern perimeter. Under the No Arena Alternative, views to the North Lot from the State/National Register of Historic Places (S/NR)-eligible Floral Park Bellerose School and residential streets that abut the North Lot would remain as in existing conditions. As with the Proposed Project, although Belmont Park is visible in the distance from the Floral Park Bellerose School, the No Arena Alternative would be located far enough away from the school that visibility of its built structures would be insignificant. Views to the East Lot from residential streets in Floral Park would be partially obscured by the existing vegetation along the northern boundary of Belmont Park Road, which extends along the north end of the Training Track, and by the North Field on Belmont Park property, located north of the Training Track, which would also provide a green buffer. The improved East Lot parking would also be partially visible from the rear playing fields and running track at Floral Park Memorial High School along Plainfield Avenue, though views would be indirect and at a distance as the proposed parking improvements would be located towards the middle and south ends of the East Lot and views from the school's fields would either be across the existing Pony Track or largely blocked by existing buildings and vegetation, on Belmont Park property.

Neither the Proposed Project nor the No Arena Alternative would result in any significant lighting-related impacts to aesthetic resources and other locally sensitive receptors within the study area. The proposed lighting strategy would incorporate best-practices principles related to duration and usage, brightness, orientation, directionality, form, and fixtures that would minimize light pollution. Under this alternative, there would be no lighting effects associated with an arena.

Both the Proposed Project and the No Arena Alternative would include a new electric substation to service the Project Sites. The proposed new electrical substation would include a 20- to 24-foot-tall bus and converter tank, and approximately four 50-foot-tall lightning rods. The substation would be located across the North Lot from the Floral Park Bellerose School, at a distance of approximately 1,000 feet. Views of the substation from Floral Park Bellerose School would likely be minimal, due to, evergreen tree plantings at the perimeter of the substation, and the distance. Neither the Proposed Project nor the No Arena Alternative on the South and East Lots would obstruct views to aesthetic resources or otherwise significantly detract from, or cause a diminishment of, the public's enjoyment of a resource. Overall, similar to the Proposed Project, while some visibility of structures resulting from the No Arena Alternative is anticipated from certain vantage points, this visibility would not result in significant adverse visual impacts to aesthetic resources.

SOCIOECONOMIC CONDITIONS

Like the Proposed Project, the No Arena Alternative would not result in significant adverse impacts related to socioeconomic conditions.

While the No Arena Alternative would create a substantial number of jobs associated with construction and operation of the retail, office and hotel project elements, there would be fewer total construction jobs and approximately 700 fewer operational jobs without the arena. In addition, this alternative would not realize any of the other economic benefits associated with construction and operation of a multi-purpose arena serving as a professional hockey venue, and hosting major concerts, college sports, conferences, and family events. The No Arena Alternative would increase commercial investment in the immediate study area and introduce new workers and visitors to the area, but not to the same extent as the Proposed Project. The No Arena Alternative's operations would provide opportunities to utilize local material and services during construction and future operations of all businesses: retail, hotel, and office. These opportunities would not be realized for the arena component under this alternative.

Under the No Arena Alternative, the uses on Site A (hotel, office, community space and open space) could be shifted so that it does not encroach on a substantial portion of the existing "Backyard" at Belmont Park. Therefore, unlike the Proposed Project, a greater number of NYRA events would continue to be hosted in the Backyard, rather than relocating events to other locations at Belmont Park. With the Proposed Project, those events are largely expected to continue by utilizing the remaining Backyard space, or may otherwise be relocated to other parts of the Belmont Park property; NYAP and NYRA would also explore opportunities to host Backyard events within Site A and adjacent remaining Backyard area.

As with the Proposed Project, visitors to the Project Sites under the No Arena Alternative would be expected to utilize existing parking at Belmont Park on the Project Sites as well as in the South and/or East Lots through a shared parking agreement with the FOB and NYRA. Similar to the Proposed Project, this alternative would require the displacement of the vehicle storage use by car dealerships in portions of Site B and the East Lot, although potentially to a lesser extent as parking demand under the No Arena Alternative would be less than with the Proposed Project. Under this alternative and the Proposed Project, the displacement of the vehicle storage use would not result in a loss of consumer base from the local area, and would not result in significant adverse socioeconomic impacts. Unlike the Proposed Actions, the No Arena Alternative would not utilize the North Lot for Project Site visitors, and therefore, there would be no displacement of the existing vehicle storage use by car dealerships in this lot.

HAZARDOUS MATERIALS

As with the Proposed Project, the No Arena Alternative would require excavation for construction of new buildings on the Project Sites (some of which include below grade space), and more limited excavation for the construction of parking fields, the proposed electrical substation, and installation of utilities at both the Project Sites and other directly affected areas.

Based on Phase I Environmental Site Assessments and a subsurface investigation, no evidence of significant contamination of soil, groundwater, or soil vapor was found. Nevertheless, similar to the Proposed Project, a variety of measures would be incorporated into the No Arena Alternative to reduce the potential for exposure to any hazardous materials that may be present. With the incorporation of these measures, the potential for significant adverse effects related to hazardous materials would be avoided.

WATER RESOURCES

As with the Proposed Project, the No Arena Alternative would not result in significant adverse impacts to water resources and would adhere to the relevant requirements and recommendations of the 208 Study, the *2016 New York Standards and Specifications for Erosion and Sediment Control* (the "Blue Book"), the *New York State Stormwater Design Manual* (January 2015), and the State Pollutant Discharge Elimination System (SPDES) general permit requirements.

Similar to the Proposed Project, as there would be no sanitary discharge to the ground with this alternative, there would be no impacts to groundwater from sewage disposal. Furthermore, the components of the No Arena Alternative would be connected to a municipal water purveyor. Therefore, impacts to groundwater at the Project Sites would be negligible. In addition, as with the Proposed Project, a variety of measures would be incorporated into this alternative to reduce the potential for exposure to any hazardous materials in groundwater that may be present.

Like the Proposed Project, under the No Arena Alternative stormwater management systems would be installed during early stages of construction to manage stormwater runoff, and various types of inlet protection would be employed in order to protect drainage infiltration systems and off-site recharge basins. In addition, like the Proposed Project, a formal Stormwater Pollution Prevention Plan (SWPPP) would be prepared and SPDES requirements (including the SPDES General Permit 0-15-002 for Stormwater Runoff During Construction Activities) would be adhered to.

The No Arena Alternative would encroach to a lesser extent into the Backyard than the Proposed Project. Therefore, a greater reduction in impervious surface would result with the No Arena Alternative, resulting in a greater reduction of volume of stormwater runoff. Like the Proposed Project, this alternative's on-site stormwater management infrastructure for Sites A and B would include installation of water quality treatment units upstream of the connection to the Nassau County infrastructure, and for the North and East Lots, a system of drywells would provide storage and infiltration to accommodate any increased runoff. Similar to the Proposed Project, virtually all stormwater runoff from the Project Sites would be contained and infiltrated/recharged, resulting in an improvement over existing conditions.

NATURAL RESOURCES

Neither the Proposed Project nor the No Arena Alternative would result in significant adverse impacts to natural resources.

Like the Proposed Project, the No Arena Alternative would eliminate or modify ecological communities that are of limited value to wildlife (e.g., paved road/path and mowed lawn with trees), and would not result in uses that would further disturb wildlife in the study area. However, on Site A, the No Arena Alternative would not require the displacement of the entire five acres of Belmont Park Backyard space that would be displaced with the Proposed Project. Therefore, under this alternative, fewer mature trees that provide habitat for birds and other wildlife typical of developed areas would be removed from Site A. Both the Proposed Project and the No Arena Alternative would require the removal of mature trees on Site B and the South Lot. As with the Proposed Project, no trees would be removed from the East Lot under the No Arena Alternative. Unlike the Proposed Project, the No Arena Alternative would not require the removal of any trees from the North Lot.

As with the Proposed Project, under the No Arena Alternative, landscaping, including the approximately 3.75 acres of landscaped open space on Site B and tree plantings, would have the potential to improve habitats for birds and pollinator species, as well as other wildlife within the Project Sites. Therefore, like the Proposed Project, the No Arena Alternative would not have a significant adverse impact on vegetation and ecological communities. Under both the Proposed Actions and the No Arena Alternative, the South Lot, adjacent to the horse stables, would be screened from wildlife in the stables area by the landscaped areas along Gate 5 Road just west of the stables. As with the Proposed Project, the proposed buildings under the No Arena Alternative, where appropriate, would implement measures to reduce daytime bird collisions, and would not be of a sufficient height to impact nighttime migrations.

Although the study area possesses limited potential to provide suitable habitat for northern long-eared bats, coordination with US Fish and Wildlife Services (USFWS) has been initiated to determine whether suitable habitat for long-eared bats is present within the Project Sites. If it is determined that the Project Sites offer suitable habitat for northern long-eared bats, tree removals under the No Arena Alternative, like with the Proposed Project, would be conducted in accordance with the USFWS recommended conservation measures to minimize potential impacts to this species. If possible, tree clearing would occur outside the April to October active season, but at a minimum would be conducted outside the June 1 to July 31 pup season in order to avoid the potential for significant adverse impacts to that species. As with the Proposed Project, the removal of state-listed willow oak trees would not be considered a significant adverse impact to protected willow oak populations with this alternative.

TRANSPORTATION

Travel demand estimates were prepared for the No Arena Alternative using the travel demand estimates for the Proposed Project (see Chapter 11, "Transportation") and subtracting out the trips generated by arena patrons and employees. **Tables 16-1 and 16-2** provide a comparison of the anticipated person and vehicle trip generation between the No Arena Alternative and the Proposed Actions for the five analysis peak hours. As shown in the tables, the No Arena Alternative would generate the same number of trips as the Proposed Actions during the weekday AM peak hour, but would generate substantially fewer trips than the Proposed Actions during the weekday PM, Saturday Midday, Saturday PM, and Saturday night peak hours.

Table 16-1
Person Trip Comparisons: No Arena Alternative vs. Proposed Actions

Development Scenario	Auto		Taxi		Subway		LIRR		Transit Bus		Walk		Total	
	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Weekday AM Peak Hour														
No Arena Alternative	727	169	8	2	18	4	18	4	110	25	26	6	907	210
Proposed Actions	727	169	8	2	18	4	18	4	110	25	26	6	907	210
Difference	0	0	0	0	0	0	0	0	-92	-21	0	0	0	0
Weekday PM Peak Hour														
No Arena Alternative	268	505	3	6	7	12	7	12	39	75	9	18	333	628
Proposed Actions	9,979	505	354	6	7	12	1,411	12	273	75	9	18	12,033	628
Difference	-9,711	0	-351	0	0	0	-1,404	0	-266	-63	0	0	-11,700	0
Saturday Midday Peak Hour														
No Arena Alternative	902	1,226	11	15	22	31	22	31	135	184	34	45	1,126	1,532
Proposed Actions	1,915	11,345	46	360	22	31	103	836	158	414	34	45	2,278	13,031
Difference	-1,013	-10,119	-35	-345	0	0	-81	-805	-136	-383	0	0	-1,152	-11,499
Saturday PM Peak Hour														
No Arena Alternative	422	759	5	10	11	18	11	18	63	113	16	29	528	947
Proposed Actions	10,718	759	356	10	11	18	830	18	297	113	16	29	12,228	947
Difference	-10,296	0	-351	0	0	0	-819	0	-286	-95	0	0	-11,700	0
Saturday Night Peak Hour														
No Arena Alternative	156	347	1	4	4	9	4	9	23	53	5	13	193	435
Proposed Actions	156	10,643	1	355	4	9	4	828	23	287	5	13	193	12,135
Difference	0	-10,296	0	-351	0	0	0	-819	-19	-278	0	0	0	-11,700

Table 16-2
Vehicle Trip Comparisons: No Arena Alternative vs. Proposed Actions

Development Scenario	Auto Trips		Internal Capture Trips Credit		Pass-by Trips Credit		Balanced Taxi Trips		Primary Trips	
	In	Out	In	Out	In	Out	In	Out	In	Out
Weekday AM Peak Hour										
No Arena Alternative	661	153	-1	-1	0	0	10	10	670	162
Proposed Actions	661	153	-1	-1	0	0	10	10	670	162
Difference	0	0	0	0	0	0	0	0	0	0
Weekday PM Peak Hour										
No Arena Alternative	243	462	-16	-14	-55	-135	10	10	182	323
Proposed Actions	3,774	462	-47	-14	-55	-135	138	138	3,810	451
Difference	-3,531	0	31	0	0	0	-128	-128	-3,628	-128
Saturday Midday Peak Hour										
No Arena Alternative	820	1,115	-59	-59	-181	-261	24	24	604	819
Proposed Actions	1,080	3,710	-223	-294	-181	-261	122	122	798	3,277
Difference	-260	-2,595	164	235	0	0	-98	-98	-194	-2,458
Saturday PM Peak Hour										
No Arena Alternative	385	691	-47	-47	-74	-148	13	13	277	509
Proposed Actions	3,817	691	-115	-47	-74	-148	130	130	3,758	626
Difference	-3,432	0	68	0	0	0	-117	-117	-3,481	-117
Saturday Night Peak Hour										
No Arena Alternative	145	317	-18	-18	-27	-75	5	5	105	229
Proposed Actions	145	4,277	-18	-86	-27	-75	140	140	240	4,256
Difference	0	-3,960	0	68	0	0	-135	-135	-135	-4,027

TRAFFIC

Detailed traffic volume maps for the weekday AM, weekday PM, Saturday Midday, Saturday PM, and Saturday night peak hours for the No Arena Alternative are presented in **Appendix F**.

Local Street Network

All study area intersections were evaluated quantitatively to determine if the No Arena Alternative would result in significant adverse traffic impacts, and if the impacts could be mitigated. **Table 16-3** presents a comparison of the number of individual traffic movements and intersections that

would have significant adverse traffic impacts and unmitigated significant adverse traffic impacts for the No Arena Alternative and Proposed Actions. Detailed traffic level of service tables showing all intersection movements are available in **Appendix F**. The results of these analyses are summarized below:

- As with the Proposed Actions, for the weekday AM peak hour, seven individual traffic movements at five intersections would be impacted under the No Arena Alternative. Like the Proposed Actions, two individual traffic movements at one intersection (Hempstead Avenue at Springfield Boulevard) would have unmitigated significant adverse impacts under the No Arena Alternative.
- For the weekday PM peak hour, four individual traffic movements at four intersections would be impacted under the No Arena Alternative, compared to six individual traffic movements at six intersections under the Proposed Actions. The intersections of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road and Hempstead Avenue at the Cross Island Parkway northbound off-ramp would not be impacted under the No Arena Alternative. Like the Proposed Actions, no individual traffic movements would have unmitigated significant adverse impacts under the No Arena Alternative.
- For the Saturday Midday peak hour, 10 individual traffic movements at seven intersections would be impacted under the No Arena Alternative, compared to 11 individual traffic movements at nine intersections under the Proposed Actions. The intersections of Hempstead Turnpike at Terrace Avenue and Jericho Turnpike at New Hyde Park Road would not be impacted under the No Arena Alternative. With respect to unmitigated movements, no individual traffic movements would have unmitigated significant adverse impacts (compared to one individual traffic movement at one intersection under the Proposed Actions). The intersection of Hempstead Avenue at 225th Street, which was unmitigated under the Proposed Actions, would be mitigated under the No Arena Alternative.
- For the Saturday PM peak hour, six individual traffic movements at five intersections would be impacted under the No Arena Alternative, compared to eight individual traffic movements at six intersections under the Proposed Actions. The intersection of Hempstead Avenue at 225th Street would not be impacted under the No Arena Alternative. Like the Proposed Actions, no individual traffic movements would have unmitigated significant adverse impacts during the Saturday PM peak hour under the No Arena Alternative.
- For the Saturday night peak hour, no individual traffic movements would be impacted under the No Arena Alternative, compared to three individual traffic movements at three intersections under the Proposed Actions. The intersections of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road, and Hempstead Avenue at 225th Street and the Cross Island Parkway northbound off-ramp, which were impacted under the Proposed Actions, would not be impacted under the No Arena Alternative.

Table 16-3
Intersections and Movements with Significant Adverse Traffic Impacts
No Arena Alternative vs. Proposed Actions

Peak Hour	Development Scenario	Movements/ Intersections Analyzed	Movements/ Intersections With No Significant Impacts	Movements/ Intersections With Significant Impacts	Mitigated Movements/ Intersections	Unmitigated Movements/ Intersections
Weekday AM	No Arena Alternative	203/38	196/33	7/5	5/4	2/1
	Proposed Actions	204/38	197/33	7/5	5/4	2/1
Weekday PM	No Arena Alternative	203/38	199/34	4/4	4/4	0/0
	Proposed Actions	204/38	198/32	6/6	6/6	0/0
Saturday Midday	No Arena Alternative	203/38	193/31	10/7	10/7	0/0
	Proposed Actions	204/38	193/29	11/9	10/8	1/1
Saturday PM	No Arena Alternative	203/38	197/33	6/5	6/5	0/0
	Proposed Actions	204/38	196/32	8/6	8/6	0/0
Saturday Night	No Arena Alternative	202/38	202/38	0/0	0/0	0/0
	Proposed Actions	204/38	201/35	3/3	3/3	0/0

Note: The number of movements analyzed is different in some development scenarios due to the presence of de facto turn lanes or geometric improvements to the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road under the Proposed Actions.

As discussed in Chapter 11, "Transportation," if night racing is approved by the New York State Legislature, NYRA may add night racing at Belmont Park one or two nights a week during some of the weeks of the Spring and Fall Meets. This could result in additional congestion at certain intersections during the weekday PM, Saturday PM, and/or Saturday night peak hours under the No Arena Alternative on evenings when live racing is held.

Highway Network

All highway segments on the Cross Island Parkway between the Southern State Parkway and Jamaica Avenue were evaluated quantitatively to determine if the No Arena Alternative would result in significant adverse traffic impacts. **Table 16-4** presents a comparison of the number of highway segments that would have significant adverse traffic impacts for the No Arena Alternative and Proposed Actions. Detailed traffic level of service tables showing all highway segments are available in **Appendix F**. The results of these analyses are summarized below:

- For the weekday AM peak hour, as with the Proposed Actions, three highway segments in the northbound direction and three highway segments in the southbound direction would be impacted under the No Arena Alternative.
- For the weekday PM peak hour, 2 highway segments in the northbound direction and 10 highway segments in the southbound direction would be impacted under the No Arena Alternative, compared to 8 highway segments in the northbound direction and 7 highway segments in the southbound direction under the Proposed Actions. There would be fewer impacted highway segments in the southbound direction under the Proposed Actions as a result of congested locations having a "metering" effect on adjacent downstream segments of the highway network.
- For the Saturday Midday peak hour, 1 highway segment in the northbound direction would be impacted under the No Arena Alternative, compared to 9 highway segments in the northbound direction and 15 highway segments in the southbound direction under the Proposed Actions.
- For the Saturday PM peak hour, 14 highway segments in the northbound direction and 17 highway segments in the southbound direction would be impacted under the No Arena Alternative, compared to five highway segments in the northbound direction and 17 highway

segments in the southbound direction under the Proposed Actions. There would be fewer impacted highway segments in the northbound direction under the Proposed Actions as a result of congested locations having a "metering" effect on adjacent downstream segments of the highway network.

- For the Saturday Night peak hour, no highway segments would be impacted under the No Arena Alternative, compared to 9 highway segments in the northbound direction and 12 highway segments in the southbound direction under the Proposed Actions.

Table 16-4
Highway Segments with Significant Adverse Traffic Impacts
No Arena Alternative vs. Proposed Actions

Peak Hour	Development Scenario	Northbound Direction	Southbound Direction	Total
Weekday AM	No Arena Alternative	3	3	6
	Proposed Actions	3	3	6
Weekday PM	No Arena Alternative	2	10	12
	Proposed Actions	8	7	15
Saturday Midday	No Arena Alternative	1	0	1
	Proposed Actions	9	15	24
Saturday PM	No Arena Alternative	14	17	31
	Proposed Actions	5	17	22
Saturday Night	No Arena Alternative	0	0	0
	Proposed Actions	9	12	21

Table 16-5 presents a comparison of the percentage of vehicles that could be processed by the Cross Island Parkway based on the results of the VISSIM micro-simulation model for the No Arena Alternative and Proposed Actions. Detailed tables showing the total vehicular demand and the number of vehicles that could be processed are available in **Appendix F**. The results of these analyses are summarized below:

- For the weekday AM peak hour, the northbound Cross Island Parkway could process about 81 to 91 percent of the peak hour demand and the southbound Cross Island Parkway could process about 96 to 99 percent of the peak hour demand under the No Arena Alternative, similar to the Proposed Actions.
- For the weekday PM peak hour, the northbound Cross Island Parkway could process about 100 percent of the peak hour demand and the southbound Cross Island Parkway could process about 99 to 100 percent of the peak hour demand under the No Arena Alternative, compared to about 79 to 100 percent of the northbound peak hour demand and about 74 to 99 percent of the southbound peak hour demand under the Proposed Actions.
- For the Saturday Midday peak hour, the northbound and southbound Cross Island Parkway could process about 100 percent of the peak hour demand under the No Arena Alternative, compared to about 93 to 100 percent of the northbound peak hour demand and about 98 to 100 percent of the southbound peak hour demand under the Proposed Actions.
- For the Saturday PM peak hour, the northbound Cross Island Parkway could process about 95 to 99 percent of the peak hour demand and the southbound Cross Island Parkway could process about 96 to 99 percent of the peak hour demand under the No Arena Alternative, compared to about 75 to 93 percent of the northbound peak hour demand and about 82 to 96 percent of the southbound peak hour demand under the Proposed Actions.

- For the Saturday Night peak hour, the northbound Cross Island Parkway could process about 100 percent of the peak hour demand and the southbound Cross Island Parkway could process about 99 percent of the peak hour demand under the No Arena Alternative, compared to about 93 to 100 percent of the northbound peak hour demand and about 98 to 99 percent of the southbound peak hour demand under the Proposed Actions.

Table 16-5

Cross Island Parkway Percentage of Vehicles Served
No Arena Alternative vs. Proposed Actions

	Segment	Weekday AM		Weekday PM		Saturday Midday		Saturday PM		Saturday Night	
		No Arena Alternative	Proposed Actions	No Arena Alternative	Proposed Actions	No Arena Alternative	Proposed Actions	No Arena Alternative	Proposed Actions	No Arena Alternative	Proposed Actions
Northbound	Merge segment at the Southern State Parkway on-ramp	81%	81%	100%	79%	100%	100%	99%	75%	100%	100%
Northbound	Mainline between the Hempstead Ave off-ramp and on-ramp	91%	91%	100%	95%	100%	100%	97%	88%	100%	100%
Northbound	Mainline at Hillside Ave overpass	90%	90%	100%	100%	100%	93%	95%	93%	100%	93%
Southbound	Mainline at Hillside Ave overpass	99%	99%	100%	74%	100%	100%	99%	82%	99%	99%
Southbound	Weaving segment between the Hempstead Ave WB on-ramp and Hempstead Ave EB off-ramp	97%	97%	99%	89%	100%	99%	96%	88%	99%	99%
Southbound	Diverge segment at the Southern State Parkway off-ramp	96%	96%	100%	99%	100%	98%	97%	96%	99%	98%

All key merge and weaving segments analyzed at the interchanges of the Cross Island Parkway with the Long Island Expressway and Grand Central Parkway were evaluated quantitatively to determine if the No Arena Alternative would result in significant impacts. Detailed traffic level of service tables showing all merge and weaving segments are available in **Appendix F**. The No Arena Alternative would not result in any significant adverse traffic impacts to any highway segments at these interchanges, whereas the Proposed Actions would result in significant adverse traffic impacts at one weaving segment during the Saturday Midday peak hour and two merge segments during the Saturday PM peak hour.

As discussed in Chapter 11, "Transportation," if night racing is approved by the New York State Legislature, NYRA may add night racing at Belmont Park one or two nights a week during some of the weeks of the Spring and Fall Meets. This could result in additional congestion at certain highway segments during the weekday PM, Saturday PM, and/or Saturday night peak hours under the No Arena Alternative on evenings when live racing is held.

LIRR SERVICE

Unlike the Proposed Actions, in the No Arena Alternative the LIRR Belmont Park Station would remain as a seasonal-use station with train service only provided on days when live racing is held at Belmont Park Racetrack.[3]

[3] As discussed in Chapter 11, "Transportation," while there have been discussions regarding the provision of additional LIRR service for the retail uses during off-peak periods during times with no arena events,

BUS SERVICE

Unlike the Proposed Actions, the No Arena Alternative would not result in significant adverse impacts to NICE and MTA bus routes which with the Proposed Project, would likely require some increases in bus service during time periods before and after arena events to accommodate bus rider trips made by arena patrons.

PARKING

As with the Proposed Project, visitors to the Project Sites under the No Arena Alternative would also utilize existing parking at Belmont Park in the South, and/or East Lots through a shared parking agreement with the FOB and NYRA. However, it is expected that these lots would be utilized to a lesser extent by Project Site visitors than under the Proposed Actions as their use would be limited to peak shopping periods. Additionally, the North Lot would not be utilized by Project Site visitors under this alternative. Like the Proposed Project, both the maximum parking demand generated by the No Arena Alternative and the combined parking demand of the No Arena Alternative with live racing at Belmont Park could be accommodated by the parking provided on the Project Sites and the North, South, and East Lots.

PEDESTRIAN CIRCULATION

Like the Proposed Actions, under the No Arena Alternative one or more grade-separated pedestrian connections would be constructed across Hempstead Turnpike providing access between the Project Sites. Similar to the Proposed Actions, in the No Arena Alternative shuttle buses would be provided to transport motorists parking in the North, South, and/or East Lots and the retail village during peak shopping periods so that patrons would not have to walk unreasonable distances.

AIR QUALITY

Neither the Proposed Project nor the No Arena Alternative would result in any significant adverse air quality impacts. Under the No Arena Alternative, air quality emissions associated with the operation of an arena—including mobile and stationary sources—would not occur, and therefore at sensitive receptors that would be affected by arena operations under the Proposed Project, pollutant concentrations would be less under the No Arena Alternative. Consequently, as with the Proposed Project, emissions from vehicles using the parking facilities would not result in significant adverse air quality impacts, and there would be no potential significant adverse air quality impacts from the emission of nitrogen dioxide and particulate matter from the proposed heat and hot water systems under the No Arena Alternative.

NOISE

Like the Proposed Actions, operation of the No Arena Alternative would not result in a significant adverse noise impact at any sensitive receptors. Under this alternative, noise associated with the operation of an arena would not occur. Specifically, noise that would be avoided under this alternative includes: noise generated by traffic traveling to and from the Project Sites and other directly affected areas for arena events; automobiles associated with arena events moving within the proposed parking facilities (including on Sites A and B, as well as the North, South, and East Lots); arena-related trucks and buses moving on the Project Sites and other directly affected areas; and the events at the proposed arena. Like with the Proposed Project, in the future with the No Arena Alternative, maximum predicted

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the transportation analyses conservatively assess future conditions with LIRR service provided to Belmont Park Station for arena events only.

noise level increases would not exceed thresholds established for determining significant adverse noise impacts according to applicable noise evaluation guidance. Additionally, the No Arena Alternative would not result in total future noise levels at any surrounding residential properties that would exceed the threshold recommended by NYSDEC for residential use.

Under the No Arena Alternative, as with the Proposed Project, future noise exposure levels at the proposed hotel would slightly exceed the threshold recommended by NYSDEC for residential use. However, the hotel would be constructed to provide a sufficient façade noise attenuation to ensure interior noise levels are below 45 dBA, which is generally regarded as acceptable for areas where people would sleep.[4] Consequently, like with the Proposed Project, the predicted noise levels at the proposed hotel would not constitute a significant adverse noise impact under the No Arena Alternative.

CLIMATE CHANGE

The building energy use and vehicle use associated with the No Arena Alternative would be less than the Proposed Project, as there would be no arena developed on Site A.

As with the Proposed Project, under the No Arena Alternative, it is assumed the Applicant would evaluate specific energy efficiency measures and design elements that may be implemented, such as seeking to achieve certification under the Leadership in Energy and Environmental Design (LEED) for Building Design and Construction rating system, version 4. Under this alternative, as with the Proposed Project, the Applicant would be committed at a minimum to achieve the prerequisite energy efficiency requirements under LEED and would likely exceed them. Furthermore, additional energy savings would likely be achieved via guidance for tenant build-out, which would control much of the building's energy use and efficiency. Like the Proposed Project, the No Arena Alternative's commitment to building energy efficiency, exceeding the energy code requirements, would ensure consistency with the decreased energy use goal defined in the *Climate Smart Communities Pledge* as part of the Town of Hempstead's GHG reduction goal.

Similar to the Proposed Project, the No Arena Alternative would also support the other GHG goals by virtue of its proximity to public transportation, reliance on natural gas, commitment to construction air quality controls, and the fact that as a matter of course, construction in the New York City metropolitan region uses recycled steel and includes cement replacements. All of these factors demonstrate that the proposed development would support the GHG reduction goal. Therefore, based on the commitment to energy efficiency and by virtue of location and nature, both the Proposed Project and the No Arena Alternative would be consistent with the Town of Hempstead's emissions reduction goals, as defined in the *Climate Smart Communities Pledge*.

Since both the Proposed Project and the No Arena Alternative would be located outside of the potential future flood zones as projected by New York State, all components of the Proposed Project and No Arena Alternative would be located well above flood elevations out to year 2100 and beyond. As with the Proposed Project, the No Arena Alternative would be able to accommodate peak precipitation under future conditions, and would therefore not negatively impact local flooding conditions during severe precipitation events.

CONSTRUCTION

As the amount of new construction under the No Arena Alternative would be less as compared with the Proposed Project, the No Arena Alternative would result in less temporary construction disruption within the surrounding area. Neither the Proposed Project nor the No Arena Alternative

[4] https://www.hudexchange.info/onecpd/assets/File/Noise-Guidebook-Chapter-2.pdf

would result in significant adverse construction impacts with respect to land use and community character, socioeconomic conditions, visual resources, historic and cultural resources, natural resources, hazardous and contaminated materials, air quality, or vibration.

Under the No Arena Alternative, a smaller-scaled project would be developed without an arena on Project Site A. Additionally, the No Arena Alternative would not involve construction related to improvements to the North Lot. The construction transportation analysis is based on the overall peak worker and truck trips during construction of the Proposed Project. Without an arena, the overall peak work and truck trips during construction under the No Arena Alternative would be less than with the Proposed Project. Therefore, the potential for significant adverse traffic impacts under the No Arena Alternative would be reduced when compared with those under the Proposed Project.

Like the Proposed Actions, during construction of the No Arena Alternative, it is anticipated that parking demand for Racetrack attendees and staff/vendors on Belmont Stakes day in 2019 could be accommodated by the supply of on-site parking at Belmont Park Racetrack. Similar to the Proposed Actions, during the running of Belmont Stakes in 2020 and 2021, when both Sites A and B would be under construction under the No Arena Alternative, it is expected that parking for Racetrack attendees could be accommodated on-site, but vendors and staff may need to park at an off-site location and be bused to Belmont Park.

Construction noise associated with the No Arena Alternative was analyzed according to the same methodology and evaluation criteria used for construction associated with the Proposed Actions as described in Chapter 15, "Construction." The No Arena Alternative construction noise analysis assumes the same noise control measures as described for the Proposed Actions. The results of the No Arena Alternative construction noise analysis are shown in **Table 16-6** and described below.

Table 16-7 provides the worst-case construction total noise level, incremental change in noise, and duration at each receptor site, for both the No Arena Alternative and the Proposed Project.

As shown in **Table 16-7**, construction of the No Arena Alternative would produce maximum noise levels of up to approximately 61 dBA at residences located on Superior Road represented by Receptor 1, which would result in an increase of up to approximately 6 dBA over existing levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the substation, including excavators, front end loaders, dump trucks, vacuum trucks, cranes, concrete trucks, and flatbed trucks, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 14 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and, similar to the Proposed Actions, construction of the No Arena Alternative would consequently not result in any significant noise impacts at this receptor or the other residences that it represents.

At the Floral Park Bellerose School on Poppy Place represented by Receptor 2, construction of the No Arena Alternative would produce maximum noise levels of approximately 56 dBA, which would result in an increase of up to approximately 3 dBA over existing levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the substation, including excavators, front end loaders, dump trucks, vacuum trucks, cranes, concrete trucks, and flatbed trucks, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 14 months. While construction noise may be noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for sensitive uses by NYSDEC, and, similar to the Proposed

Actions, construction of the No Arena Alternative would consequently not result in any significant noise impacts at this receptor.

Table 16-6
No Arena Alternative Construction Noise Analysis Results

Receptor Number	Receptor Site[1]	Existing Noise Level $L_{eq(1hr)}$ (dBA)[2]	Worst Case On-Site Construction Noise $L_{eq(1hr)}$ (dBA)	Worst Case Construction Truck Traffic Noise $L_{eq(1hr)}$ (dBA)	Worst Case Construction Total Noise $L_{eq(1hr)}$ (dBA)	Incremental Change in Noise $L_{eq(1hr)}$ (dBA)
1	Superior Road	56.1	61.3	29.3	61.3	6.3
2	Poppy Place (school)	56.1	55.9	30.8	55.9	2.9
2a	Poppy Place (open space)	56.1	59.0	33.0	59.0	4.7
3	Crocus Avenue	51.6	55.5	33.1	55.5	5.4
4	Spruce Avenue	55.9	63.0	44.1	63.1	7.9
5	Huntley Road (north of 106th Ave)	55.7	67.4	0.0	67.4	12.0
5a	Wellington Road (west side, between 106th Ave and 109th Ave)	55.7	70.4	0.0	70.4	14.8
5b	Wellington Road (west side, between 109th Ave and Hathaway Ave)	55.7	67.4	0.0	67.4	12.0
5c	Wellington Road (north of 106th Ave)	55.7	65.5	0.0	65.5	10.2
5d	Wellington Road (east side, between 106th Ave and 109th Ave)	55.7	67.6	0.0	67.6	12.2
5e	Wellington Road (east side, between 109th Ave and Hathaway Ave)	55.7	64.9	0.0	64.9	9.7
6a	Anna House	62.8	56.5	64.3	65.0	4.3
6b	Belmont Park Dormitories, along Hempstead Turnpike	62.8	63.1	64.3	66.7	5.5
6c	Elmont Medical	62.8	65.8	64.3	68.1	6.5
7	Belmont Park Racetrack	54.0	72.5	54.3	72.6	18.6
7a	Belmont Park Dormitories, western edge of stable area	54.0	68.1	54.3	68.3	14.4
7b	Belmont Park Dormitories, center of stable area	54.0	56.1	0.0	56.1	4.2
7c	Belmont Park Dormitories, northern edge of stable area	54.0	62.3	54.3	62.9	9.5
7d	Belmont Park Dormitories, along Man O War Avenue	54.0	59.2	0.0	59.2	6.3
7e	Belmont Park Dormitories, immediately adjacent to Gate 5 Road	54.0	62.3	54.3	62.9	9.5
7f	Belmont Park Dormitories at northwestern edge of stable area and Training Track	54.0	68.3	0.0	68.3	14.5

Notes:
[1] See **Figure 15-2** for locations.
[2] Existing Noise Levels measured by AKRF and discussed in Chapter 13, "Noise."

Table 16-7
Worst Case Construction Total Noise $L_{eq(1hr)}$ (dBA), Increment, and Duration
No Arena Alternative vs. Proposed Actions

Receptor Number	Receptor Site[1]	Worst Case Construction Total Noise $L_{eq(1hr)}$ (dBA)		Incremental Change in Noise $L_{eq(1hr)}$ (dBA) Over Existing Condition	
		No Arena Alternative	Proposed Actions	No Arena Alternative	Proposed Actions
1	Superior Road	61.3	64.5	6.3	9.0
2	Poppy Place (school)	55.9	62.6	2.9	7.4
2a	Poppy Place (open space)	59.0	67.1	4.7	11.3
3	Crocus Avenue	55.5	64.0	5.4	12.6
4	Spruce Avenue	63.1	63.1	7.9	7.9
5	Huntley Road (north of 106th Ave)	67.4	70.0	12.0	14.5
5a	Wellington Road (west side, between 106th Ave and 109th Ave)	70.4	70.4	14.8	14.8
5b	Wellington Road (west side, between 109th Ave and Hathaway Ave)	67.4	67.4	12.0	12.0
5c	Wellington Road (north of 106th Ave)	65.5	69.7	10.2	14.2
5d	Wellington Road (east side, between 106th Ave and 109th Ave)	67.6	67.6	12.2	12.2
5e	Wellington Road (east side, between 109th Ave and Hathaway Ave)	64.9	64.9	9.7	9.7
6a	Anna House	65.0	66.7	4.3	5.4
6b	Belmont Park Dormitories, along Hempstead Turnpike	66.7	67.6	5.5	6.1
6c	Elmont Medical	68.1	68.8	6.5	7.0
7	Belmont Park Racetrack	72.6	78.2	18.6	24.2
7a	Belmont Park Dormitories, western edge of stable area	68.3	68.3	14.4	14.4
7b	Belmont Park Dormitories, center of stable area	56.1	63.0	4.2	9.5
7c	Belmont Park Dormitories, northern edge of stable area	62.9	62.9	9.5	9.5
7d	Belmont Park Dormitories, along Man O War Avenue	59.2	59.2	6.3	6.3
7e	Belmont Park Dormitories, immediately adjacent to Gate 5 Road	62.9	62.9	9.5	9.5
7f	Belmont Park Dormitories at northwestern edge of stable area and Training Track	68.3	68.3	14.5	14.5

Notes:
[1] See **Figure 15-2** for locations.
[2] Existing Noise Levels measured by AKRF and discussed in Chapter 13, "Noise."

At the Floral Park Bellerose School athletic field north of the North Lot represented by Receptor 2a, construction of the No Arena Alternative would produce maximum noise levels of approximately 59 dBA, which would result in an increase of up to approximately 5 dBA over existing levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the substation, including excavators, front end loaders, dump trucks, vacuum trucks, cranes, concrete trucks, and flatbed trucks, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 14 months. While construction noise may be readily noticeable at times, the use of this open space is primarily for active recreation (e.g., sports, physical education, recess), which is less sensitive to noise than a purely passive open space would be. Consequently, similar to the Proposed Actions, construction of the No Arena Alternative would not result in any significant noise impacts at this receptor.

As shown in **Table 16-7**, construction of the No Arena Alternative would produce maximum noise levels of up to approximately 56 dBA at residences located on Crocus Avenue represented by Receptor 3, which would result in an increase of up to approximately 5 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the substation, including excavators, front end loaders, dump trucks, vacuum trucks, cranes, concrete trucks, and flatbed trucks, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 14 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and the duration of the construction noise would be limited. Consequently, similar to the Proposed Actions, construction of the No Arena Alternative would not result in any significant noise impacts at this receptor or the other residences that it represents.

As shown in **Table 16-7** construction of the No Arena Alternative would produce maximum noise levels of up to approximately 63 dBA at residences located on Spruce Avenue represented by Receptor 4, which would result in an increase of up to approximately 8 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the East Lot and would include bulldozers, excavators, dump trucks, and paving equipment, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 5 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and the duration of the construction noise would be limited. Consequently, similar to the Proposed Actions, construction of the No Arena Alternative would not result in any significant noise impacts at this receptor or the other residences that it represents.

As shown in **Table 16-7**, construction of the No Arena Alternative would produce maximum noise levels between approximately 65 and 70 dBA at residences to the east of Site B represented by Receptors 5 through 5e, which would result in increases over existing noise levels between approximately 10 and 15 dBA. These maximum noise level increases would occur during the worst-case construction activity for these receptors, which would be excavation/foundation construction of the retail village at Site B. This construction would include the use of demolition saws, cranes, excavators, generators, dump trucks, and concrete trucks and would have a duration of approximately 17 months. During the remaining phases of construction of the retail village at Site B, which would last approximately 7 months, construction would produce maximum noise levels between approximately 54 and 62 dBA at the residences to the east of Site B, which would result in increases over existing noise levels between approximately 2 and 7 dBA.

At receptors immediately adjacent to Site B, represented by Receptors 5, 5a, and 5b, and receptors with one row of intervening buildings to Site B north of 109th Avenue, represented by Receptors 5c and 5d, noise levels during the worst-case construction activity would be readily noticeable and intrusive at times. At these receptors, worst-case construction noise levels exceed the acceptable criteria for residential uses provided by NYSDEC and experience noise level increases greater than 10 dBA. As a result of the construction noise levels that would occur at these receptors at times over the course of approximately 17 months, similar to the Proposed Actions, residences along Huntley Road, both sides of Wellington Road between Hempstead Turnpike and 109th Avenue, the west side of Wellington Road between 109th Avenue and Hathaway Avenue, and the north side of Hathaway Avenue west of Wellington Road would have the potential to experience significant adverse construction noise impacts.

At receptors south of 109th Avenue with one or more rows of intervening buildings to the construction site, represented by Receptor 5e, construction noise would be readily noticeable and intrusive at times. However, worst-case construction noise levels would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC. Consequently, similarly to the Proposed Actions, construction of the No Arena Alternative would not result in any significant noise impacts at these residences.

At the Anna House Child Care Facility represented by Receptor 6a, construction of the No Arena Alternative would produce maximum noise levels of up to approximately 65 dBA, which would result in an increase of up to approximately 4 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the South Lot, which has a duration of approximately 4 months, and would include hoe rams, bulldozers, paving equipment, and dump trucks along with construction truck trips on Hempstead Turnpike. This worst-case condition would have a duration of approximately 3 months while the volume of construction trucks on Hempstead Turnpike would be at its maximum. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not result in an increase of more than 6 dBA over existing noise levels and therefore, similar to the Proposed Actions, construction of the No Arena Alternative would not result in any significant noise impacts at this receptor.

At the Belmont Park Dormitories located to the south of the stable area along Hempstead Turnpike, represented by Receptor 6b, construction of the No Arena Alternative would produce maximum noise levels of up to approximately 67 dBA, which would result in an increase of up to approximately 6 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the South Lot including hoe rams, bulldozers, paving equipment, and dump trucks, along with construction truck trips on Hempstead Turnpike. This worst-case condition would have a duration of approximately 3 months while the volume of construction trucks on Hempstead Turnpike would be at its maximum. While construction noise may be readily noticeable at times, noise levels during the worst-case construction activity would result in an increase of less than 6 dBA over existing noise levels. Therefore, similar to the Proposed Actions, construction of the No Arena Alternative would not rise to the level of a significant noise impact at these dormitories.

At the Elmont Medical Facility represented by Receptor 6c, construction of the No Arena Alternative would produce maximum noise levels of up to approximately 68 dBA, which would result in an increase of up to approximately 7 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the South Lot, which has a duration of approximately 4 months, and would include hoe rams, bulldozers, paving equipment, and dump trucks, along with construction truck trips on Hempstead Turnpike. This worst-case condition would have a duration of approximately 7 non-consecutive months. While construction noise may be readily noticeable at times, the total noise level would be less than the 79 dBA threshold considered acceptable for commercial use by NYSDEC criteria, and the duration of the construction noise would be limited. Consequently, similar to the Proposed Actions, construction of the No Arena Alternative would not result in any significant noise impacts at this receptor.

At areas within Belmont Park along the Racetrack where horses are trained/exercised represented by Receptor 7, and along the Training Track represented by Receptor 7f, construction of the No Arena Alternative would produce maximum noise levels between approximately 68 and 73 dBA, which would result in increases of between 14 and 19 dBA over existing noise levels. These

maximum noise level increases at the Racetrack would occur during construction of the substation, including excavators, front end loaders, dump trucks, vacuum trucks, cranes, concrete trucks, and flatbed trucks, along with construction trucks traversing Belmont Park Road and the Training Track during East Lot construction including bulldozers, excavators, paving equipment, rollers, and forklifts. Noise impact criteria have not been developed for horses. However, horses have a hearing frequency range similar to humans, with considerable overlap between the range of best hearing between humans and horses, though hearing sensitivity is poorer in horses than humans (i.e., the sound level of a noise at a given frequency must be higher to be detectable by horses).[5] Therefore, given that the predicted maximum noise levels of approximately 68 to 73 dBA are above the 65 dBA considered acceptable for sensitive uses by NYSDEC, the projected peak construction noise levels could be disturbing to horses, and the 14 to 19 dBA increase could be perceived by the horses as a dramatic change in noise levels.

The noise levels in **Table 16-7**, expressed as $L_{eq(1hr)}$ (i.e., the average noise level over the course of one hour), may not account for impulsive or short-duration sounds, which may not produce large increases in the $L_{eq(1hr)}$ due to their limited duration. Horses, like other animals,[6,7] may be sensitive to impulsive noise from impact equipment, such as pile driving, jackhammering, etc., as well as other short duration sounds, such as back-up alarms and loud truck braking. Impact equipment would be utilized during construction of the South Lot (the area closest to horse stables and training). These impulsive and short-duration noise-producing activities have the potential to startle horses, posing a safety issue to horses and riders.

Though maximum noise levels could impact horses and impulsive and short-duration noise has the potential to elicit startle reactions, when construction activities overlap with horse training, the Applicant and construction team would coordinate with the horse training operators to adjust construction means, methods, and scheduling whenever possible to reduce the potential for adverse noise impacts.

As shown in **Table 16-7**, construction of the No Arena Alternative would produce maximum noise levels of approximately 68 dBA at the Belmont Park Dormitories located along the western edge of the stable area near the Gate 5 Road, represented by Receptor 7a, which would result in an increase over existing noise levels of approximately 14 dBA. This maximum noise level increase would occur during the worst-case construction activities for this receptor, which would be construction of the South Lot. This worst-case construction has a duration of approximately 4 months and would include hoe rams, bulldozers, paving equipment, and dump trucks. Therefore, at the Belmont Park Dormitories located along the western edge of the stable area, noise levels during the worst-case construction activity would be readily noticeable and intrusive at times. At these receptors, worst-case construction noise levels exceed the acceptable criteria for residential uses provided by NYSDEC and experience noise level increases greater than 10 dBA. As a result of the construction noise levels that would occur at these receptors at times over the course of approximately 4 months, similar to the Proposed Actions, Belmont Park Dormitories along the

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[5] Bregman, M.R., J.R. Iversen, D. Lichman, M. Reinhar, and A.D. Patel. 2012. A method for testing synchronization to a musical beat in domestic horses (*Equus ferus caballus*). *Empirical Musicology Review* 7:144-156.

[6] Richardson, W.J., C.R. Greene, Jr., C.I. Malme, and D.H. Thomson. *Marine Mammals and Noise*. San Diego, CA: Academic Press.

[7] Hawkins, A.D. and A.N. Popper. 2014. Assessing the impact of underwater sounds on fishes and other forms of marine life. *Acoustics Today* 10:30-41.

western edge of the stable area would have the potential to experience significant adverse construction noise impacts.

As shown in **Table 16-7**, at the Belmont Park Dormitories located within the central portion of the stable area represented by receptor 7b, construction of the No Arena Alternative would produce maximum noise levels of approximately 56 dBA, which would result in increases over existing noise levels of approximately 4 dBA. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the South Lot. This worst-case construction has a duration of approximately 4 months and would include hoe rams, bulldozers, paving equipment, and dump trucks. While construction noise may be noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and similar to the Proposed Actions construction of the No Arena Alternative would consequently not result in any significant noise impacts at this receptor or the other dormitories that it represents.

As shown in **Table 16-7**, at the Belmont Park Dormitories located at the northern edge of the stable area near the Training Track, represented by receptor 7c, construction of the No Arena Alternative would produce maximum noise levels of approximately 63 dBA, which would result in increases over existing noise levels of approximately 10 dBA. This maximum noise level increase would occur during the worst-case construction activity for these receptors, which would be construction of the East Lot and would include bulldozers, excavators, paving equipment, rollers, and forklifts. This worst-case condition would have a duration of approximately 5 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and similar to the Proposed Actions, construction of the No Arena Alternative would consequently not result in any significant noise impacts at this receptor or the other dormitories that it represents.

As shown in **Table 16-7**, at the Belmont Park Dormitories located in the northeastern portion of the stable area near Man O War Avenue, represented by receptor 7d, construction of the No Arena Alternative would produce maximum noise levels of approximately 59 dBA, which would result in increases over existing noise levels of approximately 6 dBA. This maximum noise level increase would occur during the worst-case construction activity for these receptors, which would be construction of the East Lot and would include bulldozers, excavators, paving equipment, rollers, and forklifts. This worst-case condition would have a duration of approximately 5 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and similar to the Proposed Actions construction of the No Arena Alternative would consequently not result in any significant noise impacts at this receptor or the other dormitories that it represents.

As shown in **Table 16-7**, at the Belmont Park Dormitories located immediately adjacent to Gate 5 Road, represented by receptor 7e, construction of the No Arena Alternative would produce maximum noise levels of approximately 63 dBA, which would result in increases over existing noise levels of approximately 10 dBA. This maximum noise level increase would occur during the worst-case construction activity for these receptors, which would be construction of the East Lot and would include bulldozers, excavators, paving equipment, rollers, and forklifts. This worst-case condition would have a duration of approximately 5 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and similar

to the Proposed Actions, construction of the No Arena Alternative would not result in any significant noise impacts at this receptor or the other dormitories that it represents.

As shown in **Table 16-7**, construction of the No Arena Alternative would produce maximum noise levels of approximately 68 dBA at the Belmont Park Dormitories located along the northwestern edge of the stable area near the Training Track, represented by Receptor 7f, which would result in an increase over existing noise levels of approximately 15 dBA. This maximum noise level increase would occur during the worst-case construction activities for this receptor, which would be construction of the East Lot. This worst-case construction has a duration of approximately 5 months and would include bulldozers, excavators, paving equipment, rollers, and forklifts. Therefore, at the Belmont Park Dormitories located along the northwestern edge of the stable area near the Training Track, noise levels during the worst-case construction activity would be readily noticeable and intrusive at times. At these receptors, worst-case construction noise levels exceed the acceptable criteria for residential uses provided by NYSDEC and experience noise level increases greater than 10 dBA. As a result of the construction noise levels that would occur at these receptors at times over the course of approximately 5 months, similar to the Proposed Actions, Belmont Park Dormitories along the northwestern edge of the stable area near the Training Track would have the potential to experience significant adverse construction noise impacts.

CONCLUSIONS

Like the Proposed Actions, the No Arena Alternative would not result in significant adverse impacts with respect to: land use, zoning, and community character; community facilities and utilities; open space and recreational resources; historic and cultural resources; visual resources; socioeconomic conditions; hazardous materials; water resources; natural resources; LIRR service; pedestrian circulation; air quality; and noise.

The No Arena Alternative would eliminate the impact to bus service that would occur with the Proposed Project. With respect to operational traffic and construction traffic and noise, the No Arena Alternative may lessen, but not eliminate those impacts. While both the No Arena Alternative and Proposed Project would result in unmitigated traffic and construction noise impacts, one of the two unmitigated impacts to the local street network would be eliminated under the No Arena Alternative.

The overarching goals of the State for the Belmont Park property are to foster economic development and increase activity at Belmont Park with uses that are compatible with the Racetrack and the surrounding neighborhoods. The proposed new uses under the No Arena Alternative would activate sites that are used only on a sporadic basis over the course of a year, but to a lesser extent than the Proposed Project. While this alternative would transform the current vacant and underutilized space on the Project Sites with new uses, without an arena, it would be less of a premier destination to complement Belmont Park. It would not provide a new and permanent home for the New York Islanders; the Proposed Project's new arena is expected to attract a wide audience of new and existing fans. The No Arena Alternative would not create as many permanent and temporary construction jobs as the Proposed Project. In addition, this alternative would not realize any of the other economic benefits associated with construction and operation of a multi-purpose arena serving as a professional hockey venue, and hosting major concerts, college sports, conferences, and family events. Overall, this alternative would not substantially avoid or reduce project-related significant adverse impacts, and would be less effective in meeting the State's development objectives for the Project Sites.

E. ALTERNATE SITE PLAN ALTERNATIVE

At the time of the issuance of the Draft Scope for the DEIS, two site plan options were under consideration for the Project Sites: Site Plan Options 1 and 2. The primary difference between the two options was the allocation of the proposed retail uses across Sites A and B. Site Plan Option 1 would locate all of the proposed retail uses on Site A with the proposed arena, hotel, and office uses, while Site Plan Option 2 would locate the proposed retail village on Site B (see **Figure 16-1**). As detailed in the Final Scope and Chapter 1, "Project Description" of this DEIS, Site Plan Option 2 was selected as the preferred site plan, and it is the basis for the Proposed Project analyses in the preceding chapters of this DEIS.

This Alternate Site Plan Alternative provides an analysis of Site Plan Option 1, as described below:

- Site A would include: the proposed arena (approximately 690,000 gsf); the hotel (up to 250 keys); all of the proposed retail (up to approximately 435,000 gsf, including both entertainment and dining retail and the retail village); approximately 30,000 gsf of office space; approximately 1.2 acres of publicly accessible open space; and approximately 1,339 below-grade parking spaces.
- Site B would include: approximately 10,000 gsf of community space; approximately 6.1 acres of publicly accessible open space; and approximately 2,360 spaces of at-grade parking.
- Sites A and B would be connected by two pedestrian bridges.

The Alternate Site Plan Alternative would include the same amount of arena, hotel, retail, office and community space as the Proposed Project. However, it would include on the Project Sites an additional 1,759 parking spaces and an additional 3.55 acres of publicly accessible open space as compared to the Proposed Project.

As with the Proposed Project, visitors to the Project Sites under the Alternate Site Plan Alternative would also utilize existing parking at Belmont Park in the North, South, and East Lots through a shared parking agreement with the FOB and NYRA.

Like the Proposed Project, the Alternate Site Plan Alternative would also require a new electrical substation to service the project because Belmont Park currently does not have the infrastructure necessary to accommodate this alternative's energy demand. Similar to the Proposed Actions, the Alternate Site Plan Alternative would include the implementation of geometric and signal phasing improvements at the intersection of Hempstead Turnpike at Locustwood Boulevard/Gate 5 Road.

Figure 16-1 provides an illustrative site plan of the Alternate Site Plan Alternative.

Conditions under the Alternate Site Plan Alternative as compared with the future with the Proposed Actions are summarized below.

LAND USE, ZONING AND COMMUNITY CHARACTER

As with the Proposed Project, the Alternate Site Plan Alternative would result in a substantial change to the existing land use and character of Site A. Site B, however, would not undergo as much of a substantial change to the existing land use under this alternative as with the Proposed Project. Under the Alternate Site Plan Alternative, much of Site B would continue to be used as a parking lot, and the remainder to the site would include new open space and community space. As with the Proposed Project, the North, South, and East Lots would be used in a similar manner to that which currently occurs with regard to event parking, but on a more frequent basis. In particular, the North and East Lots would be used more frequently for active parking during events

Source: New York Arena Partners, LLC, Belmont Arena + RD&E Master Plan, October 2018.

FOR ILLUSTRATIVE PURPOSES ONLY

Alternative Project Sites

North, South, and East Parking Lots

Proposed Belmont Electrical Substation

Alternate Site Plan Alternative
Figure 16-1

as compared to its current use for the storage of vehicles and overflow parking for the annual Belmont Stakes. However, while both the Proposed Project and the Alternate Site Plan Alternative would represent intensification of land uses on the Project Sites, the proposed land uses would be compatible with the existing development of the Belmont Park property as a racetrack and entertainment facility, which has been in existence for over 110 years.

The Belmont Park property was chosen for redevelopment and enhancement with a new arena and complementary uses such as the hotel, office, and retail establishments, because of the nature of its existing use and its prominence in the community. The overarching goals of the State for this site are to foster economic development and increase activity at Belmont Park with uses that are compatible with the Racetrack and the surrounding neighborhoods. Similar to the Proposed Project, under the Alternate Site Plan Alternative, the proposed new uses would activate sites (particularly Site A) that are used only on a sporadic basis over the course of a year, making Belmont Park more of a year-round destination. In addition to the intensification of uses on Site A, Site B, the North Lot and East Lot would be used on a more frequent basis than currently occurs for overflow event parking. Similar to the Proposed Project, this alternative's retail uses would draw the surrounding community onto the Belmont Park property through economic and social opportunities. As with the Proposed Project, the Alternate Site Plan Alternative would provide proposed fencing and a vegetated buffer (and natural berm) on Site B, which would serve to separate the uses on Site B from the existing residences.

From a land use perspective, both the Proposed Project and the Alternate Site Plan Alternative would meet the development objective set forth by New York State of enhancing Belmont Park to become one of Long Island's premier destinations for sports, entertainment, hospitality, and retail with uses that are complementary to the existing Racetrack and associated facilities. Based on the foregoing, the Proposed Project and the Alternate Site Plan Alternative would provide land uses that fit well within the existing Belmont Park property and community (since Belmont Park has been a sports/entertainment venue and a major part of the Elmont community for over a century), and that would draw people to Belmont Park year-round. The proposed retail uses would complement, rather than directly compete with, existing retail facilities in the area. Thus, implementation of either the Proposed Project or the Alternate Site Plan Alternative, while substantially intensifying development on the Project Sites, is not expected to result in a significant adverse land use impact on the surrounding community.

As with the Proposed Project, under the Alternate Site Plan Alternative, zoning overrides of the Hempstead BZO and Hempstead Town Code would be sought to effectuate the development of Sites A and B. No change in underlying zoning of the Project Sites would occur, and it is expected that there would be no impact to the zoning of surrounding areas.

The proposed redevelopment of Sites A and B under this alternative would be consistent with the local, County, and State comprehensive planning documents and policy recommendations, as one of the major goals consistently identified in policy statements at all levels is for this area to harness the prominence of Belmont Park to spur economic development and to create an important gateway to Long Island.

Similar to the Proposed Project, once development of the Alternate Site Plan Alternative would be completed, it would transform Site A, an underutilized site, into a vibrant, year-round operating and accessible mixed-use development that would be compatible with the surrounding area. The Alternate Site Plan Alternative would develop Site B with less intensive uses than with the Proposed Project, and these would also be compatible with the surrounding area.

COMMUNITY FACILITIES AND UTILITIES

Like the Proposed Actions, the Alternate Site Plan Alternative would not result in significant adverse impacts to community facilities and utilities.

Under the Alternate Site Plan Alternative, demand for police protection, fire protection and ambulance/emergency medical services would be the same as with the Proposed Actions.

Overall, since the Proposed Project and the Alternate Site Plan Alternative would result in the same amount of development, the volumes of solid waste and recyclables would also be the same. As with the Proposed Project, under the Alternate Site Plan Alternative there would be new solid waste collection on Site B, which is currently only used for parking and vehicle storage and does not generate solid waste.

Overall, since the Proposed Project and the Alternate Site Plan Alternative would result in the same amount of development, the increase in water demand and sewage flow would also be the same. However, because there would be a more intense concentration of uses on Site A under the Alternate Site Plan Alternative, the water demand for Site A and the sewage flow from Site A would be more than with the Proposed Project. The WWTP, located in East Rockaway, is operating within its SPDES permit capacity and would have the capacity to treat the projected sewage effluent from either the Proposed Project or the Alternate Site Plan Alternative. Neither the Proposed Project nor the Alternate Site Plan Alternative would result in a significant adverse impact on sewage disposal infrastructure.

Electrical service is provided by PSEG Long Island. Early in the environmental review process, PSEG Long Island identified the need to construct an electrical substation to adequately serve the Proposed Project. Like the Proposed Project, with the construction of the new electrical substation, feeders and transmission lines, the electrical supply demands of the Alternate Site Plan Alternative would be satisfied and, thus, no significant adverse impact on electrical services would be anticipated.

As with the Proposed Project, under the Alternate Site Plan Alternative, the proposed substation would not have a significant adverse impact on neighboring properties due to the distance to the nearest residences and other sensitive receptors (e.g., schools) and, as the proposed feeders and transmission lines would be underground and almost entirely located on Belmont Park property, any increases in EMF levels would not have a significant adverse impact on the surrounding community.

Under the Alternate Site Plan Alternative, like the Proposed Project, it is likely that Site B, as well as the North, South and East Lots would need new, additional or upgraded utility line extensions to handle new and additional lighting within these parking lots.

Natural gas is provided by National Grid. The natural gas demands of the Alternate Site Plan Alternative would be the same as the demands of the Proposed Project, and like the Proposed Actions, there would be no significant adverse impact to the natural gas supply under the Alternate Site Plan Alternative.

Like the Proposed Project, the Alternate Site Plan Alternative would have no direct impacts on schools, day care facilities, libraries, and hospitals (including no displacement of such facilities). In addition, since there would be no residential population generated by the Alternate Site Plan Alternative, there would be no indirect impact on schools, libraries, and day care facilities. Under the Alternate Site Plan Alternative, there would be less potential demand for area hospitals, but like the Proposed Project, no significant adverse impact would be anticipated.

OPEN SPACE AND RECREATIONAL RESOURCES

Neither the Proposed Project nor the Alternate Site Plan Alternative would result in significant adverse impacts on publicly accessible open space or recreational resources.

DIRECT EFFECTS

As with the Proposed Project, the Alternate Site Plan Alternative would introduce new publicly-accessible open spaces to Belmont Park, including approximately 1.2 acres of hard- and soft-scaped plazas on Site A (compared to 2.0 acres with the Proposed Project), and an approximately 6.1-acre landscaped open space with walking paths on Site B, along the southern and eastern boundary (compared to 3.75-acres with the Proposed Project).

While both the Proposed Project and Alternate Site Plan Alternative would displace a portion of the existing and well-utilized "Backyard" space within Belmont Park, the plazas contemplated for Site A—with sitting areas, gathering spaces for on-site events, and programming—as well as the passive open space proposed for Site B—would offset the loss of this space, and would meet the recreational space needs of existing Backyard patrons and new arena workers and visitors. However, as compared with the Proposed Project, this alternative's smaller plazas on Site A could experience more congestion during arena events and peak shopping periods. As with the Proposed Project, the newly created plaza space under the Alternate Site Plan Alternative would be open to the public free of charge, and would not require an entry fee which is currently required to access the Backyard. The NYRA events currently held within the Backyard space are largely expected to continue in the future with the Proposed Project and the Alternate Site Plan Alternative, utilizing the remaining Backyard space, or may otherwise relocate to other parts of the Belmont Park property.

In addition to the proposed on-site open space, it is assumed that under this alternative, NYAP has committed to working with ESD and local officials and community stakeholders, including the Town of Hempstead, to make improvements to existing open space in the nearby community. Elmont Road Park in the Town of Hempstead is currently under consideration.

Neither the Proposed Project nor the Alternate Site Plan Alternative would result in any significant adverse impacts on open space resources including from air quality, noise, or shadows, either during construction or during event- and non-event day operations. In addition, like the Proposed Project, the No Arena Alternative would not preclude the ongoing use of existing open space resources at Belmont Park by Floral Park Memorial High School students.

INDIRECT EFFECTS

While both the Proposed Project and the Alternate Site Plan Alternative would introduce substantial new worker and visitor populations to the Project Sites, due to the campus-like nature of Belmont Park and the distance workers would travel to exit Belmont Park, it is unlikely that these workers or visitors would utilize open spaces within the communities surrounding Belmont Park, preferring to utilize on-site space at Belmont Park. As with the Proposed Project, to accommodate the new on-site populations, as well as the existing Backyard patrons and surrounding communities, new open spaces would be created as part of the Alternate Site Plan Alternative, which would offset the incremental demands that the new workers and visitors would place on the existing recreational areas at Belmont Park.

Like with the Proposed Project, open spaces directly adjacent to Belmont Park—including the Belmont Bench Spread, Belmont Ball Park, and Hendrickson Avenue Park—may experience some increased utilization by Belmont Park workers and visitors as a result of the Alternate Site

Plan Alternative. However, the increase is unlikely to be substantial, as access to these spaces from Belmont Park is limited along Hempstead Turnpike, and the proposed on-site amenities would support the recreational needs of workers and visitors.

HISTORIC AND CULTURAL RESOURCES

Neither the Proposed Project nor the Alternate Site Plan Alternative would result in significant adverse impacts on historic resources. Like the Proposed Project, the Alternate Site Plan Alternative would redevelop Project Sites A and B with new uses, the North, South, and East Lots would be resurfaced, restriped, and include new lighting, and a new electrical substation would be constructed adjacent to the North Lot to the west.

There are no known or potential archaeological or architectural resources on the Project Sites or within the other directly affected areas, and thus as with the Proposed Project, the Alternate Site Plan Alternative would not have any direct or indirect impacts to on-site archaeological or architectural resources. There is one known architectural resource in the study area—the Floral Park Bellerose School—that is located approximately 400 feet from the North Lot, separated by a playing field, and thus has visibility to that portion of the directly affected area. As with the Proposed Project, under the Alternate Site Plan Alternative, no new structures would be constructed on the North Lot, with the exception of lighting poles and potential low scale ticket booths; however, the North Lot would be used more frequently for active parking during arena events as compared to its current use for the storage of vehicles and overflow parking for the annual Belmont Stakes. Similar to the Proposed Project, the Alternate Site Plan Alternative would include new fencing, and dense border vegetation along the northeastern boundary of the North Lot to screen and soften the separation between the North Lot and the playing field in the rear of Floral Park Bellerose School, and to reduce visibility. In addition, although Belmont Park is visible in the distance from the Floral Park Bellerose School, the Alternate Site Plan Alternative would be located far enough away from the school that visibility of its built structures would be insignificant. Therefore, like the Proposed Project, the Alternate Site Plan Alternative would not have any direct (physical) or indirect (visual/contextual) impacts to architectural resources within the study area.

VISUAL RESOURCES

Like the Proposed Actions, the Alternate Site Plan Alternative would not result in significant adverse impacts to aesthetic resources in the study area; would not impinge on viewsheds of the aesthetic resources; and would not interfere with the public's enjoyment of Floral Park Bellerose School and other historic resources in the study area, as well as local parks including Hempstead Ballfield, Hempstead Bench Spread, and Pat Williams Playground.

As with the Proposed Project, the Alternate Site Plan Alternative on Site A would be visible from certain aesthetic resources or sensitive view locations in Elmont, Queens Village, and Floral Park. The buildings would also be larger structures than found throughout most of the study area. Under the Alternate Site Plan Alternative, the project buildings would be more concentrated on Site A than with the Proposed Project. With the Proposed Project, in Elmont, northwest views of Site A from residential Huntley Road would be of the upper stories of the hotel. Under the Alternate Site Plan Alternative, the proposed hotel—the tallest structure proposed on Site A—would be located in the northwest portion of Site A, and the retail village would be located east of the arena, in the eastern portion of Site A. Therefore, views from Huntly Road toward Site A under the Alternate Site Plan Alternative may include more distant views of the upper stories of the hotel than with the Proposed Project, and some views of the lower-height retail village structures. While views

from residential Huntley Road may include views of the structures proposed on Site A, as with the Proposed Project, they would not be direct and would be partially obscured by vegetation. The views would remain compatible with the street's existing setting, which includes a north view of the Grandstand/Clubhouse. In Queens Village, with the Proposed Project, three public parks near the Cross Island Parkway would have views of the arena and office/community space development. Under the Alternate Site Plan Alternative, these views would include the arena and the hotel, a taller structure than the proposed office building. Similarly, with the Proposed Actions, Hempstead Ballfield, Hempstead Bench Spread, and Pat Williams Playground would have views of the proposed arena and office/community space. Under the Alternate Site Plan Alternative, these views would include the arena and the hotel. However, like the Proposed Project, the Alternate Site Plan Alternative would be physically separated by the Cross Island Parkway and the grassy area of the Hempstead Turnpike/Cross Island Parkway cloverleaf interchange. In Floral Park, views of the Proposed Project on Site A would be limited to only the upper stories of the hotel above the Grandstand/Clubhouse. Under the Alternate Site Plan Alternative, these views would include the hotel adjacent to the Grandstand/Clubhouse to the east. However, as with the Proposed Project on Site A, the Alternate Site Plan Alternative on Site A would not result in significant adverse impacts to aesthetic resources in Elmont, Queens Village or Floral Park, as it would not obstruct views to aesthetic resources or otherwise significantly detract from, or cause a diminishment of the public's enjoyment of a resource.

Under the Alternate Site Plan Alternative, the development proposed on Site B would not include a retail village. Site B would be developed with an improved surface parking area, approximately 10,000 gsf of community space, and approximately 6.1 acres of publicly accessible open space. Unlike with the Proposed Project, these uses on Site B would not be visible from Huntley Road and a segment of Wellington Road in Elmont, which are residential streets located adjacent to the site's eastern boundary. As with the Proposed Project, the Alternate Site Plan Alternative would provide a linear open space on the east side of Site B, with a landscaped berm that would obscure views from Huntley Road. Neither the Proposed Project nor the Alternate Site Plan Alternative on Site B would result in any impacts to views to aesthetic resources or diminish the public's enjoyment of a resource, or significantly impact sensitive viewers.

The North, South, and East Lots would be resurfaced, restriped, and illuminated under both the Proposed Actions and the Alternate Site Plan Alternative. The proposed North and East Lots would be made more active and may contain small ticketing booths. To reduce the potential for visual impacts to the S/NR-eligible Floral Park Bellerose School and residential streets that abut the North Lot, a dense border vegetation would be planted along the northeastern perimeter of the North Lot. Views to the East Lot from residential streets in Floral Park would be partially obscured by the existing vegetation along the northern boundary of Belmont Park Road, which extends along the north end of the Training Track, and by the North Field on Belmont Park property, located north of the Training Track, which would also provide a green buffer. The improved East Lot parking would also be partially visible from the rear playing fields and running track at Floral Park Memorial High School along Plainfield Avenue, though views would be indirect and at a distance as the proposed parking improvements are located towards the middle and south ends of the East Lot and views from the school's fields would either be across the existing Pony Track or largely blocked by existing buildings and vegetation on Belmont Park property.

Neither the Proposed Project nor the Alternate Site Plan Alternative would result in any significant lighting-related impacts to aesthetic resources and other locally sensitive receptors within the study area. The proposed lighting strategy would incorporate best-practices principles related to

duration and usage, brightness, orientation, directionality, form, and fixtures that would minimize light pollution.

Both the Proposed Project and the Alternate Site Plan Alternative would include a new electric substation to service the Project Sites. The proposed new electrical substation would include a 20- to 24-foot-tall bus and converter tank, and approximately four 50-foot-tall lightning rods. The substation would be located across the North Lot from the Floral Park Bellerose School, at a distance of approximately 1,000 feet. Views of the substation from Floral Park Bellerose School would likely be minimal, due to the proposed screening at the edges of the North Lot, evergreen tree plantings at the perimeter of the substation, and the distance. Neither the Proposed Project nor the Alternate Site Plan Alternative on the North, South, and East Lots would obstruct views to aesthetic resources or otherwise significantly detract from, or cause a diminishment of, the public's enjoyment of a resource. Overall, similar to the Proposed Project, while some visibility of structures resulting from the Alternate Site Plan Alternative is anticipated from certain vantage points, this visibility would not result in significant adverse visual impacts to aesthetic resources.

SOCIOECONOMIC CONDITIONS

Neither the Proposed Project nor the Alternate Site Plan Alternative would result in any significant adverse environmental impacts due to changes in socioeconomic conditions. The Alternate Site Plan Alternative would include the same amount of arena, hotel, retail, office and community space as the Proposed Project. However, it would include on the Project Sites an additional 1,759 parking spaces and an additional 3.55 acres of publicly accessible open space as compared to the Proposed Project. This alternative would create a similar amount of local jobs and result in the same economic synergies as the Proposed Project.

As with the Proposed Project, the car dealerships that currently utilize portions of Site B and the North and East Lots for vehicle storage on month-to-month leases are expected to relocate this use outside of the ½-mile study area under the Alternate Site Plan Alternative. Irrespective of relocation, the vehicle storage use does not bring customers to these locations; as such, potential displacement of this use would not result in a loss of consumer base from the local area, and would not result in significant adverse impacts. With respect to the NYRA events currently held within the Backyard space, those events are largely expected to continue in the future with both the Proposed Project and the Alternate Site Plan Alternative, utilizing the remaining Backyard space, or may otherwise be relocated to other parts of the Belmont Park property. NYAP and NYRA would explore opportunities to host Backyard events within Site A and the adjacent remaining Backyard area.

Neither the Proposed Project nor the Alternate Site Plan Alternative would add or directly displace populations and would not introduce new residents or housing that could affect residential market conditions.

Both the Proposed Project and the Alternate Site Plan Alternative would result in several changes to the study area's business and economic profile, namely: the introduction of dining and entertainment-oriented retail, luxury outlet retail, an arena, a hotel, and office and community space uses. However, these changes would not present conditions that could lead to indirect business displacement due to increases in property values and rent or due to a climate of disinvestment in the study area and primary trade areas. Both the Proposed Project and Alternate Site Plan Alternative would lead to economic and social gains that could make the surrounding communities more vibrant and potentially more attractive to businesses.

As with the Proposed Project, the Alternate Site Plan Alternative would not significantly affect competition within the primary trade areas in any of the sectors analyzed and it would, therefore, not have the potential to generate significant adverse impacts to socioeconomic conditions.

HAZARDOUS MATERIALS

As with the Proposed Project, the Alternate Site Plan Alternative would require excavation for construction of new buildings on the Project Sites (some of which include below grade space), and more limited excavation for the construction of parking fields, the proposed electrical substation, and installation of utilities at both the Project Sites and other directly affected areas.

Based on Phase I Environmental Site Assessments and a subsurface investigation, no evidence of significant contamination of soil, groundwater, or soil vapor was found. Nevertheless, similar to the Proposed Project, a variety of measures would be incorporated into the Alternate Site Plan Alternative to reduce the potential for exposure to any hazardous materials that may be present. With the incorporation of these measures, the potential for significant adverse effects related to hazardous materials would be avoided.

WATER RESOURCES

As with the Proposed Project, the Alternate Site Plan Alternative would not result in significant adverse impacts to water resources and would adhere to the relevant requirements and recommendations of the 208 Study, the *2016 New York Standards and Specifications for Erosion and Sediment Control* (the "Blue Book"), the *New York State Stormwater Design Manual* (January 2015), and the SPDES general permit requirements.

Similar to the Proposed Project, as there would be no sanitary discharge to the ground with this alternative, there would be no impacts to groundwater from sewage disposal. Furthermore, the components of the Alternate Site Plan Alternative would be connected to a municipal water purveyor. Therefore, impacts to groundwater at the Project Sites would be negligible. In addition, as with the Proposed Project, a variety of measures would be incorporated into this alternative to reduce the potential for exposure to any hazardous materials in groundwater that may be present.

Like the Proposed Project, under the Alternate Site Plan Alternative stormwater management systems would be installed during early stages of construction to manage stormwater runoff, and various types of inlet protection would be employed in order to protect drainage infiltration systems and off-site recharge basins. In addition, like the Proposed Project, a formal SWPPP would be prepared and SPDES requirements (including the SPDES General Permit 0-15-002 for Stormwater Runoff During Construction Activities) would be adhered to.

As compared with the Proposed Project, the Alternate Site Plan Alternative would include a similar amount of impervious surface on Site A, but a greater amount of open space (pervious surface) on Site B. Therefore, a greater reduction in impervious surface would result with this alternative, resulting in a greater reduction of volume of stormwater runoff. Like the Proposed Project, this alternative's on-site stormwater management infrastructure for Sites A and B would include installation of water quality treatment units upstream of the connection to the Nassau County infrastructure, and for the North and East Lots, a system of drywells would provide storage and infiltration to accommodate any increased runoff. Similar to the Proposed Project, virtually all stormwater runoff from the Project Sites would be contained and infiltrated/recharged, resulting in an improvement over existing conditions.

NATURAL RESOURCES

Neither the Proposed Project nor the Alternate Site Plan Alternative would result in significant adverse impacts to natural resources.

Like the Proposed Project, the Alternate Site Plan Alternative would eliminate or modify ecological communities that are of limited value to wildlife (e.g., paved road/path and mowed lawn with trees), and would not result in uses that would further disturb wildlife in the study area. However, both the Proposed Project and the Alternate Site Plan Alternative would result in the loss of a number of mature trees that provide habitat for birds and other wildlife typical of developed areas. Similar to the 3.75 acres of landscaped open space and tree plantings on Site B with the Proposed Project, the approximately 6.1 acres of similar landscaping on Site B under the Alternate Site Plan Alternative would have the potential to improve habitats for birds and pollinator species, as well as other wildlife within the Project Sites. Therefore, like the Proposed Project, the Alternate Site Plan Alternative would not have a significant adverse impact on vegetation and ecological communities. Under both the Proposed Actions and the Alternate Site Plan Alternative, the South Lot, adjacent to the horse stables, would be screened from wildlife in the stables area by the landscaped areas along Gate 5 Road just west of the stables. As with the Proposed Project, the proposed buildings under the Alternate Site Plan Alternative, where appropriate, would implement measures to reduce daytime bird collisions, and would not be of a sufficient height to impact nighttime migrations.

Although the study area possesses limited potential to provide suitable habitat for northern long-eared bats, coordination with USFWS has been initiated to determine whether suitable habitat for long-eared bats is present within the Project Sites. If it is determined that the Project Sites offer suitable habitat for northern long-eared bats, tree removals under the Alternate Site Plan Alternative, like with the Proposed Project, would be conducted in accordance with the USFWS recommended conservation measures to minimize potential impacts to this species. If possible, tree clearing would occur outside the April to October active season, but at a minimum would be conducted outside the June 1 to July 31 pup season in order to avoid the potential for significant adverse impacts to that species. As with the Proposed Project, the removal of state-listed willow oak trees would not be considered a significant adverse impact to protected willow oak populations with this alternative.

TRANSPORTATION

As the Alternate Site Plan Alternative would include the same amount of arena, retail, hotel, office and community space as the Proposed Project, it would generate the same amount of person trips and vehicle trips as the Proposed Actions. The travel patterns and directionality of trips under the Alternate Site Plan Alternative would also be similar to the Proposed Actions, but there would likely be some changes in the assignment of project-generated traffic volumes in the immediate vicinity of the Project Sites due the additional parking spaces on Sites A and B and modifications to internal site circulation within the Project Sites.

LOCAL STREET NETWORK

The number of intersections and individual traffic movements with significant adverse traffic impacts under the Alternate Site Plan Alternative would likely be comparable to those under the Proposed Actions, except that the magnitude of some impacts could be different for the intersections located along the segment of Hempstead Turnpike/Avenue between Locustwood Boulevard/Gate 5 Road and 225th Street due to a redistribution of traffic volumes among the entrances to the Project Sites. Like the Proposed Actions, it is expected that implementation of

traffic engineering improvements would provide mitigation for nearly all of the anticipated traffic impacts to the local street network under the Alternate Site Plan Alternative, except for the intersections of Hempstead Avenue at Springfield Boulevard and 225th Street, which would remain unmitigated as under the Proposed Actions.

HIGHWAY NETWORK

The amount of highway segments with significant adverse traffic impacts under the Alternate Site Plan Alternative would likely be comparable to those under the Proposed Actions, except that the magnitude and location of some impacts could be different along the Cross Island Parkway in the vicinity of the Project Sites due to a redistribution of traffic volumes using Exits 26A, 26B/C, and 26D. The same types of event-day traffic management strategies described in Chapter 17, "Mitigation," that are aimed at minimizing or reducing project-generated vehicular traffic and reducing the confluence of peak traffic conditions from adjacent uses, would be employed for both the Proposed Actions and the Alternate Site Plan Alternative. However, even with these strategies in place, it is expected that there would still be some highway segments where the traffic management plan would not be sufficient to fully mitigate impacts.

LIRR SERVICE

Like the Proposed Project, in the Alternate Site Plan Alternative it is anticipated that the LIRR would provide service on days with scheduled events at the proposed arena that could accommodate the projected number of riders that would use commuter rail. Similar to the Proposed Actions, it is unlikely that the Alternate Site Plan Alternative would result in any impacts to platforms, stairways, or ramps at Belmont Park Station.

BUS SERVICE

Like the Proposed Project, the Alternate Site Plan Alternative would result in significant adverse impacts to NICE and MTA bus service and would likely require some increases in bus service during time periods before and after arena events to accommodate bus rider trips made by arena patrons.

PARKING

As with the Proposed Project, visitors to the Project Sites under the Alternate Site Plan Alternative would also utilize existing parking at Belmont Park in the North, South, and/or East Lots through a shared parking agreement with the FOB and NYRA. However, since there would be an additional 1,759 parking spaces under the Alternate Site Plan Alternative, it is expected that these lots would be utilized to a lesser extent by Project Site visitors than under the Proposed Actions during times of arena events and/or peak shopping periods. Like the Proposed Project, both the maximum parking demand generated by the Alternate Site Plan Alternative and the combined parking demand of the Alternate Site Plan Alternative with live racing at Belmont Park could be accommodated by the parking provided on the Project Sites and the North, South, and East Lots.

PEDESTRIAN CIRCULATION

Under the Alternate Site Plan Alternative, Sites A and B would be connected by two pedestrian bridges, whereas under the Proposed Actions, Sites A and B would be connected by one more grade-separated connections across Hempstead Turnpike (i.e., bridge or tunnel). Like the Proposed Actions, in the Alternate Site Plan Alternative shuttle buses would be provided to transport attendees between the North and East Lots and the arena or between the South and East

Lots and the retail village during arena events and/or peak shopping periods so that patrons would not have to walk unreasonable distances.

AIR QUALITY

Neither the Proposed Project nor the Alternate Site Plan Alternative would result in any significant adverse air quality impacts. The Alternate Site Plan Alternative would include the same amount of arena, retail, hotel, office and community space, and therefore generate the same amount of vehicle trips as the Proposed Project. Therefore, as with the Proposed Project, the Alternate Site Plan Alternative would not substantially increase the number of diesel vehicles in the area, and additional traffic at local intersections and highway segments would not be enough to result in significant adverse mobile source air quality impacts. While the Alternate Site Plan Alternative would result in more parking capacity on Sites A and B compared with the Proposed Project, as with the Proposed Project, maximum predicted concentrations from vehicles using the parking facilities would be expected to be substantially below the applicable standards, and would not result in significant adverse air quality impacts. Additionally, it is expected that the maximum predicted concentrations from the heating and hot water systems of the proposed buildings (as well as the dehumidification system for the arena) would be similar to concentrations predicted with the Proposed Project. Therefore, as with the Proposed Project, the Alternate Site Plan Alternative would not result in significant adverse stationary source air quality impacts.

NOISE

As the Alternate Site Plan Alternative would include the same amount of arena, retail, hotel, office and community space as the Proposed Project, it would generate the same amount of vehicle trips as the Proposed Actions. The travel patterns and directionality of trips under the Alternate Site Plan Alternative would also be similar to the Proposed Actions, but there would likely be some changes in the assignment of project-generated traffic volumes in the immediate vicinity of the Project Sites due the additional parking spaces on Sites A and B and modifications to internal site circulation within the Project Sites. Nevertheless, as with the Proposed Project, under the Alternate Site Plan Alternative, maximum predicted noise level increases would not exceed thresholds established for determining significant adverse noise impacts according to applicable noise evaluation guidance. Additionally, the Alternate Site Plan Alternative, like the Proposed Project, would not result in total future noise levels at any surrounding residential properties that would exceed the threshold recommended by NYSDEC for residential use. Consequently, as with the Proposed Project, operation of the Alternate Site Plan Alternative would not result in a significant adverse noise impact at any of these receptors.

Like with the Proposed Project, under the Alternate Site Plan Alternative, it is expected that future noise exposure levels at the proposed hotel would slightly exceed the threshold recommended by NYSDEC for residential use. However, the hotel would be constructed to provide a sufficient façade noise attenuation to ensure interior noise levels are below 45 dBA, which is generally regarded as acceptable for areas where people would sleep. Consequently, the predicted noise levels at the proposed hotel would not constitute a significant adverse noise impact under this alternative.

CLIMATE CHANGE

The building energy use and vehicle use associated with the Proposed Project and the Alternate Site Plan Alternative would be similar.

As with the Proposed Project, under the Alternate Site Plan Alternative, the Applicant would evaluate specific energy efficiency measures and design elements that may be implemented, such as seeking to achieve certification under the LEED for Building Design and Construction rating system, version 4. Under this alternative, as with the Proposed Project, the Applicant would be committed at a minimum to achieve the prerequisite energy efficiency requirements under LEED and would likely exceed them. Furthermore, additional energy savings would likely be achieved via guidance for tenant build-out, which would control much of the building's energy use and efficiency. Like the Proposed Project, the Alternate Site Plan Alternative's commitment to building energy efficiency, exceeding the energy code requirements, would ensure consistency with the decreased energy use goal defined in the *Climate Smart Communities Pledge* as part of the Town of Hempstead's GHG reduction goal.

Similar to the Proposed Project, the Alternate Site Plan Alternative would also support the other GHG goals by virtue of its proximity to public transportation, reliance on natural gas, commitment to construction air quality controls, and the fact that as a matter of course, construction in the New York City metropolitan region uses recycled steel and includes cement replacements. All of these factors demonstrate that the proposed development would support the GHG reduction goal.

Therefore, based on the commitment to energy efficiency and by virtue of location and nature, both the Proposed Project and the Alternate Site Plan Alternative would be consistent with the Town of Hempstead's emissions reduction goals, as defined in the *Climate Smart Communities Pledge*.

Since both the Proposed Project and the Alternate Site Plan Alternative would be located outside of the potential future flood zones as projected by New York State, all components of the Proposed Project and Alternate Site Plan Alternative would be located well above flood elevations out to 2100 and beyond. As with the Proposed Project, the Alternate Site Plan Alternative would be able to accommodate peak precipitation under future conditions, and would therefore not negatively impact local flooding conditions during severe precipitation events.

CONSTRUCTION

Although the overall construction activities and logistics under the Alternate Site Plan Alternative would be similar to those for the Proposed Project, construction activities under the Alternate Site Plan Alternative would be more concentrated at Site A. Therefore, temporary construction disruption on the residences surrounding Site B would be less under the Alternate Site Plan Alternative. Neither the Proposed Project nor the Alternate Site Plan Alternative would result in significant adverse construction impacts with respect to land use and community character, socioeconomic conditions, visual resources, historic and cultural resources, natural resources, hazardous and contaminated materials, air quality, or vibration.

The number of construction vehicle trips generated by construction workers and trucks traveling to and from the construction sites over the duration of construction activities associated with the Alternate Site Plan Alternative would generally be expected to be similar to the Proposed Actions. As the site access points for construction vehicles under the Alternate Site Plan Alternative would be the same as those under the Proposed Actions, it is expected that construction activities associated with the Alternate Site Plan Alternative during the projected peak quarter of construction would result in the same significant adverse traffic impacts at three intersections during the 6:00 AM to 7:00 AM peak hour.

Like the Proposed Actions, during construction of the Alternate Site Plan Alternative, it is anticipated that parking demand for Racetrack attendees and staff/vendors on Belmont Stakes day

in 2019 could be accommodated by the supply of on-site parking at Belmont Park Racetrack. Unlike the Proposed Actions, during the running of Belmont Stakes in 2020 and 2021, it is anticipated that parking demand for Racetrack attendees and staff/vendors could be accommodated by the supply of on-site parking at Belmont Park Racetrack as additional surface parking spaces would be available on Site B.

Construction noise associated with the Alternate Site Plan Alternative was analyzed according to the same methodology and evaluation criteria used for construction associated with the Proposed Actions as described in Chapter 15, "Construction." The Alternate Site Plan Alternative construction noise analysis assumes the same noise control measures as described for the Proposed Actions. The results of the Alternate Site Plan Alternative construction noise analysis are shown in **Table 16-8** and described below.

Table 16-9 provides the worst-case construction total noise level, incremental change in noise, and duration at each receptor site, for both the Alternate Site Plan Alternative and the Proposed Project.

As shown in **Table 16-**9, construction of the Alternate Site Plan Alternative would produce maximum noise levels of up to approximately 65 dBA at residences located on Superior Road represented by Receptor 1, which would result in an increase of up to approximately 9 dBA over existing levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the North Lot and would include bulldozers, excavators, dump trucks, and paving equipment, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 6 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and, similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would consequently not result in any significant noise impacts at this receptor or the other residences that it represents.

At the Floral Park Bellerose School on Poppy Place represented by Receptor 2, construction of the Alternate Site Plan Alternative would produce maximum noise levels of approximately 63 dBA, which would result in an increase of up to approximately 7 dBA over existing levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the North Lot and would include bulldozers, excavators, dump trucks, and paving equipment, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 6 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for sensitive uses by NYSDEC, and, similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would consequently not result in any significant noise impacts at this receptor.

Table 16-8
Alternate Site Plan Alternative Construction Noise Analysis Results

Receptor Number	Receptor Site[1]	Existing Noise Level $L_{eq(1hr)}$ (dBA)[2]	Worst Case On-Site Construction Noise $L_{eq(1hr)}$ (dBA)	Worst Case Construction Truck Traffic Noise $L_{eq(1hr)}$ (dBA)	Worst Case Construction Total Noise $L_{eq(1hr)}$ (dBA)	Incremental Change in Noise $L_{eq(1hr)}$ (dBA)
1	Superior Road	56.1	64.5	29.3	64.5	9.0
2	Poppy Place (school)	56.1	62.6	30.8	62.6	7.4
2a	Poppy Place (open space)	56.1	67.1	33.0	67.1	11.3
3	Crocus Avenue	51.6	64.0	33.1	64.0	12.6
4	Spruce Avenue	55.9	63.0	44.1	63.1	7.9
5	Huntley Road (north of 106th Ave)	55.7	70.0	0.0	70.0	14.5
5a	Wellington Road (west side, between 106th Ave and 109th Ave)	55.7	67.0	0.0	67.0	11.6
5b	Wellington Road (west side, between 109th Ave and Hathaway Ave)	55.7	63.6	0.0	63.6	8.6
5c	Wellington Road (north of 106th Ave)	55.7	69.7	0.0	69.7	14.2
5d	Wellington Road (east side, between 106th Ave and 109th Ave)	55.7	66.6	0.0	66.6	11.2
5e	Wellington Road (east side, between 109th Ave and Hathaway Ave)	55.7	63.1	0.0	63.1	8.1
6a	Anna House	62.8	60.2	65.6	66.7	5.4
6b	Belmont Park Dormitories, along Hempstead Turnpike	62.8	63.3	65.6	67.6	6.1
6c	Elmont Medical	62.8	65.9	65.6	68.8	7.0
7	Belmont Park Racetrack	54.0	78.2	54.3	78.2	24.2
7a	Belmont Park Dormitories, western edge of stable area	54.0	68.1	54.3	68.3	14.4
7b	Belmont Park Dormitories, center of stable area	54.0	63.0	0.0	63.0	9.5
7c	Belmont Park Dormitories, northern edge of stable area	54.0	62.3	54.3	62.9	9.5
7d	Belmont Park Dormitories, along Man O War Avenue	54.0	59.2	0.0	59.2	6.3
7e	Belmont Park Dormitories, immediately adjacent to Gate 5 Road	54.0	62.3	54.3	62.9	9.5
7f	Belmont Park Dormitories at northwestern edge of stable area and Training Track	54.0	62.3	0.0	68.3	14.5

Notes:
[1] See **Figure 15-2** for locations.
[2] Existing Noise Levels measured by AKRF and discussed in Chapter 13, "Noise".

Table 16-9

Worst Case Construction Total Noise $L_{eq(1hr)}$ (dBA), Increment, and Duration
Alternate Site Plan Alternative vs. Proposed Actions

		Worst Case Construction Total Noise $L_{eq(1hr)}$ (dBA)		Incremental Change in Noise $L_{eq(1hr)}$ (dBA) Over Existing Condition	
Receptor Number	**Receptor Site[1]**	**Alternate Site Plan Alternative**	**Proposed Actions**	**Alternate Site Plan Alternative**	**Proposed Actions**
1	Superior Road	64.5	64.5	9.0	9.0
2	Poppy Place (school)	62.6	62.6	7.4	7.4
2a	Poppy Place (open space)	67.1	67.1	11.3	11.3
3	Crocus Avenue	64.0	64.0	12.6	12.6
4	Spruce Avenue	63.1	63.1	7.9	7.9
5	Huntley Road (north of 106th Ave)	70.0	70.0	14.5	14.5
5a	Wellington Road (west side, between 106th Ave and 109th Ave)	67.0	70.4	11.6	14.8
5b	Wellington Road (west side, between 109th Ave and Hathaway Ave)	63.6	67.4	8.6	12.0
5c	Wellington Road (north of 106th Ave)	69.7	69.7	14.2	14.2
5d	Wellington Road (east side, between 106th Ave and 109th Ave)	66.6	67.6	11.2	12.2
5e	Wellington Road (east side, between 109th Ave and Hathaway Ave)	63.1	64.9	8.1	9.7
6a	Anna House	66.7	66.7	5.4	5.4
6b	Belmont Park Dormitories, along Hempstead Turnpike	67.6	67.6	6.1	6.1
6c	Elmont Medical	68.8	68.8	7.0	7.0
7	Belmont Park Racetrack	78.2	78.2	24.2	24.2
7a	Belmont Park Dormitories, western edge of stable area	68.3	68.3	14.4	14.4
7b	Belmont Park Dormitories, center of stable area	63.0	63.0	9.5	9.5
7c	Belmont Park Dormitories, northern edge of stable area	62.9	62.9	9.5	9.5
7d	Belmont Park Dormitories, along Man O War Avenue	59.2	59.2	6.3	6.3
7e	Belmont Park Dormitories, immediately adjacent to Gate 5 Road	62.9	62.9	9.5	9.5
7f	Belmont Park Dormitories at northwestern edge of stable area and Training Track	68.3	68.3	14.5	14.5

Notes:
[1] See **Figure 15-2** for locations.
[2] Existing Noise Levels measured by AKRF and discussed in Chapter 13, "Noise."

At the Floral Park Bellerose School athletic field north of the North Lot represented by Receptor 2a, construction of the Alternate Site Plan Alternative would produce maximum noise levels of approximately 67 dBA, which would result in an increase of up to approximately 11 dBA over existing levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the North Lot and would include bulldozers, excavators, dump trucks, and paving equipment, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 6 months. While construction noise may be readily noticeable and intrusive at times, the duration of construction would be limited, and the use of this open space is primarily for active recreation (e.g., sports, physical education, recess), which is less sensitive to noise than a purely passive open space would be. Consequently, similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would not result in any significant noise impacts at this receptor.

As shown in **Table 16-9**, construction of the Alternate Site Plan Alternative would produce maximum noise levels of up to approximately 64.0 dBA at residences located on Crocus Avenue represented by Receptor 3, which would result in an increase of up to approximately 13 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the North Lot and would include bulldozers, excavators, dump trucks, and paving equipment, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 6 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and the duration of the construction noise would be limited. Consequently, similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would not result in any significant noise impacts at this receptor or the other residences that it represents.

As shown in **Table 16-9**, construction of the Alternate Site Plan Alternative would produce maximum noise levels of up to approximately 63 dBA at residences located on Spruce Avenue represented by Receptor 4, which would result in an increase of up to approximately 8 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the East Lot and would include bulldozers, excavators, dump trucks, and paving equipment, along with construction truck trips traversing Belmont Park Road. This worst-case condition would have a duration of approximately 5 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and the duration of the construction noise would be limited. Consequently, similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would not result in any significant noise impacts at this receptor or the other residences that it represents.

As shown in **Table 16-9**, construction of the Alternate Site Plan Alternative would produce maximum noise levels between approximately 63 and 70 dBA at residences to the east of Site B represented by Receptors 5 through 5e, which would result in increases over existing noise levels between approximately 8 and 15 dBA. These maximum noise level increases would occur during the worst-case construction activity for these receptors, which would be during construction of the arena at Site A when pile driving is occurring in the southeast corner of the construction site. This worst-case construction would have a duration of approximately 5 weeks. Elevated noise levels would also occur at these receptors during the construction of the Site B parking facility and

community space. This construction would include the use of hoe rams, excavators, dump trucks, rollers, and paving equipment and would have a duration of approximately 6 months.

At residences north of 109th Avenue, represented by Receptors 5, 5a, 5c, and 5d, noise levels during the worst-case construction activity would be readily noticeable and intrusive at times. At these receptors, worst-case construction noise levels exceed the acceptable criteria for residential uses provided by NYSDEC and experience noise level increases greater than 10 dBA. These worst case noise levels occur over a period of approximately 7 non-consecutive months for residences immediately adjacent to Site B construction, represented by receptors 5 and 5a, and approximately 6 months for residences with one row of intervening buildings between the Site B construction, represented by receptors 5c and 5d. As a result of the construction noise levels that would occur at these receptors at times over the course of up to 7 months, similar to the Proposed Actions, residences along Huntley Road and Wellington Road between 109th Avenue and Hempstead Turnpike would have the potential to experience significant adverse construction noise impacts.

At residences south of 109th Avenue, represented by Receptors 5b and 5e, construction noise would be readily noticeable and intrusive at times. However, worst-case construction noise levels would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC. Consequently, construction of the Alternate Site Plan Alternative would not result in any significant noise impacts at these residences.

At the Anna House Child Care Facility represented by Receptor 6a, construction of the Alternate Site Plan Alternative would produce maximum noise levels of up to approximately 67 dBA, which would result in an increase of up to approximately 5 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the arena including pile driving, hoe rams, bulldozers, excavators, dump trucks, and concrete trucks, along with construction truck trips on Hempstead Turnpike. This worst-case condition would have a duration of approximately 3 months while the volume of construction trucks on Hempstead Turnpike would be at its maximum. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not result in an increase of more than 6 dBA over existing noise levels and therefore, similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would not result in any significant noise impacts at this receptor.

At the Belmont Park Dormitories located to the south of the stable area along Hempstead Turnpike, represented by Receptor 6b, construction of the Alternate Site Plan Alternative would produce maximum noise levels of up to approximately 68 dBA, which would result in an increase of up to approximately 6 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the arena including pile driving, hoe rams, bulldozers, excavators, dump trucks, and concrete trucks, along with construction truck trips on Hempstead Turnpike. This worst-case condition would have a duration of approximately 3 months while the volume of construction trucks on Hempstead Turnpike would be at its maximum. During all other construction periods, truck volumes along Hempstead Turnpike would be reduced and the increase in noise levels would be less than 6 dBA for these dormitories. While construction noise may be readily noticeable at times, noise levels during the worst-case construction activity with a duration of approximately 3 months would result in an increase of approximately 6 dBA over existing noise levels and therefore, similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would not rise to the level of a significant noise impact at these dormitories.

At the Elmont Medical Facility represented by Receptor 6c, construction of the Alternate Site Plan Alternative would produce maximum noise levels of up to approximately 69 dBA, which would result in an increase of up to approximately 7 dBA over existing noise levels. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be construction of the arena including pile driving, hoe rams, bulldozers, excavators, dump trucks, and concrete trucks, along with construction truck trips on Hempstead Turnpike. Elevated noise levels would also occur during construction of the South Lot, which has a duration of approximately 4 months, and would include hoe rams, bulldozers, paving equipment, and dump trucks. This worst-case condition would have a duration of approximately 11 non-consecutive months. While construction noise may be readily noticeable at times, the total noise level would be less than the 79 dBA threshold considered acceptable for commercial use by NYSDEC criteria, and the duration of the construction noise would be limited. Consequently, similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would not result in any significant noise impacts at this receptor.

At areas within Belmont Park along the Racetrack where horses are trained/exercised represented by Receptor 7, and along the Training Track represented by Receptor 7f, construction of the Alternate Site Plan Alternative would produce maximum noise levels between approximately 68 and 78 dBA, which would result in increases between 14 and 24 dBA over existing noise levels. These maximum noise level increases at the Racetrack would occur during construction of the arena including pile driving, hoe rams, bulldozers, excavators, dump trucks, and concrete trucks, along with construction trucks traversing Belmont Park Road and at the Training Track during East Lot construction including bulldozers, excavators, paving equipment, rollers, and forklifts. Elevated noise levels would also occur at various portions of the main Racetrack or Training Track during construction of the North Lot and electrical substation. Noise impact criteria have not been developed for horses. However, horses have a hearing frequency range similar to humans, with considerable overlap between the range of best hearing between humans and horses, though hearing sensitivity is poorer in horses than humans (i.e., the sound level of a noise at a given frequency must be higher to be detectable by horses).[8] Therefore, given that the predicted maximum noise levels of approximately 68 to 78 dBA are above the 65 dBA considered acceptable for sensitive uses by NYSDEC, the projected peak construction noise levels could be disturbing to horses, and the 14 to 24 dBA increase could be perceived by the horses as a dramatic change in noise levels.

The noise levels in **Table 16-9**, expressed as $L_{eq(1hr)}$ (i.e., the average noise level over the course of one hour), may not account for impulsive or short-duration sounds, which may not produce large increases in the $L_{eq(1hr)}$ due to their limited duration. Horses, like other animals,[9,10] may be sensitive to impulsive noise from impact equipment, such as pile driving, jackhammering, etc., as well as other short duration sounds, such as back-up alarms and loud truck braking. Impact equipment would be utilized during construction of the South Lot and construction of the arena

[8] Bregman, M.R., J.R. Iversen, D. Lichman, M. Reinhar, and A.D. Patel. 2012. A method for testing synchronization to a musical beat in domestic horses (*Equus ferus caballus*). *Empirical Musicology Review* 7:144-156.

[9] Richardson, W.J., C.R. Greene, Jr., C.I. Malme, and D.H. Thomson. *Marine Mammals and Noise*. San Diego, CA: Academic Press.

[10] Hawkins, A.D. and A.N. Popper. 2014. Assessing the impact of underwater sounds on fishes and other forms of marine life. *Acoustics Today* 10:30-41.

(the areas closest to horse stables and training). These impulsive and short-duration noise-producing activities have the potential to startle horses, posing a safety issue to horses and riders.

Though maximum noise levels could impact horses and impulsive and short-duration noise has the potential to elicit startle reactions, the main Racetrack is anticipated to be closed from approximately mid-2019 to April 2020. This closure period largely overlaps with the heavy construction activities planned for arena construction, reducing the potential for adverse noise impacts on horses. When construction activities overlap with horse training, the Applicant and construction team would coordinate with the horse training operators to adjust construction means, methods, and scheduling whenever possible to reduce the potential for adverse noise impacts.

As shown in **Table 16-9**, construction of the Proposed Project would produce maximum noise levels of approximately 68 dBA at the Belmont Park Dormitories located along the western edge of the stable area near the Gate 5 Road, represented by Receptor 7a, which would result in an increase over existing noise levels of approximately 14 dBA. This maximum noise level increase would occur during the worst-case construction activities for this receptor, which would be construction of the South Lot. This worst-case construction has a duration of approximately 4 months and would include hoe rams, bulldozers, paving equipment, and dump trucks. Elevated noise levels would also occur during pile driving for the arena, which has a duration of approximately 5 weeks. Therefore, at the Belmont Park Dormitories located along the western edge of the stable area, noise levels during the worst-case construction activity would be readily noticeable and intrusive at times. At these receptors, worst-case construction noise levels exceed the acceptable criteria for residential uses provided by NYSDEC and experience noise level increases greater than 10 dBA. As a result of the construction noise levels that would occur at these receptors at times over the course of approximately 5 non-consecutive months, similar to the Proposed Actions, Belmont Park Dormitories along the western edge of the stable area would have the potential to experience significant adverse construction noise impacts.

As shown in **Table 16-9**, at the Belmont Park Dormitories located within the central portion of the stable area represented by receptor 7b, construction of the Alternate Site Plan Alternative would produce maximum noise levels of approximately 63 dBA, which would result in increases over existing noise levels of approximately 10 dBA. This maximum noise level increase would occur during the worst-case construction activity for this receptor, which would be pile driving during construction of the arena. This worst-case condition would have a duration of approximately 7 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would consequently not result in any significant noise impacts at this receptor or the other dormitories that it represents.

As shown in **Table 16-9**, at the Belmont Park Dormitories located at the northern edge of the stable area near the Training Track, represented by receptor 7c, construction of the Alternate Site Plan Alternative would produce maximum noise levels of approximately 63 dBA, which would result in increases over existing noise levels of approximately 10 dBA. This maximum noise level increase would occur during the worst-case construction activity for these receptors, which would be construction of the East Lot and would include bulldozers, excavators, paving equipment, rollers, and forklifts. This worst-case condition would have a duration of approximately 5 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and similar to the Proposed Actions, construction of the Alternate

Site Plan Alternative would consequently not result in any significant noise impacts at this receptor or the other dormitories that it represents.

As shown in **Table 16-9**, at the Belmont Park Dormitories located within in the northeastern portion of the stable area near Man O War Avenue, represented by receptor 7d, construction of the Alternate Site Plan Alternative would produce maximum noise levels of approximately 59 dBA, which would result in increases over existing noise levels of approximately 6 dBA. This maximum noise level increase would occur during the worst-case construction activity for these receptors, which would be construction of the East Lot and would include bulldozers, excavators, paving equipment, rollers, and forklifts. This worst-case condition would have a duration of approximately 5 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would consequently not result in any significant noise impacts at this receptor or the other dormitories that it represents.

As shown in **Table 16-9**, at the Belmont Park Dormitories located immediately adjacent to Gate 5 Road, represented by receptor 7e, construction of the Alternate Site Plan Alternative would produce maximum noise levels of approximately 63 dBA, which would result in increases over existing noise levels of approximately 10 dBA. This maximum noise level increase would occur during the worst-case construction activity for these receptors, which would be construction of the East Lot and would include bulldozers, excavators, paving equipment, rollers, and forklifts. This worst-case condition would have a duration of approximately 5 months. While construction noise may be readily noticeable at times, noise levels during even the worst-case construction activity would not exceed 65 dBA, which is considered acceptable for residential uses by NYSDEC, and similar to the Proposed Actions, construction of the Alternate Site Plan Alternative would consequently not result in any significant noise impacts at this receptor or the other dormitories that it represents.

As shown in **Table 16-9**, construction of the Alternate Site Plan Alternative would produce maximum noise levels of approximately 68 dBA at the Belmont Park Dormitories located along the northwestern edge of the stable area near the Training Track, represented by Receptor 7f, which would result in an increase over existing noise levels of approximately 15 dBA. This maximum noise level increase would occur during the worst-case construction activities for this receptor, which would be construction of the East Lot. This worst-case construction has a duration of approximately 5 months and would include bulldozers, excavators, paving equipment, rollers, and forklifts. Therefore, at the Belmont Park Dormitories located along the northwestern edge of the stable area near the Training Track, noise levels during the worst-case construction activity would be readily noticeable and intrusive at times. At these receptors, worst-case construction noise levels exceed the acceptable criteria for residential uses provided by NYSDEC and experience noise level increases greater than 10 dBA. As a result of the construction noise levels that would occur at these receptors at times over the course of approximately 5 months, Belmont Park Dormitories along the northwestern edge of the stable area near the Training Track would have the potential to experience significant adverse construction noise impacts.

Prior to completion of the Final Environmental Impact Statement (FEIS), the construction noise analysis will be refined to more specifically determine the existing condition noise levels and the construction noise increments at these receptors. The refinement may include additional measurements of existing noise levels in this area as well as additional information regarding the predicted construction program for the East Lot.

CONCLUSIONS

Like the Proposed Project, the Alternate Site Plan Alternative would not result in significant adverse impacts with respect to: land use, zoning, and community character; community facilities and utilities; open space and recreational resources; historic and cultural resources; visual resources; socioeconomic conditions; hazardous materials; water resources; natural resources; LIRR service; pedestrian circulation; air quality; and noise.

Like the Proposed Project, the Alternate Site Plan Alternative would result in significant adverse operational traffic and bus service impacts, as well as significant adverse construction traffic and noise impacts. As the Alternate Site Plan Alternative would have the same program as the Proposed Project, it would have similar traffic and bus impacts, with minor differences accounting for variations in travel patterns and directionality of trips in the immediate vicinity of the Project Sites. It is expected that the same unmitigated adverse traffic impacts would occur under this alternative.

The Alternate Site Plan Alternative would meet the State's development objectives for Project Site A, but less so for Project Site B. Similar to the Proposed Project, this alternative would transform Site A, an underutilized site, into a vibrant, year-round operating and accessible mixed-use development that would be compatible with the surrounding area. The Alternate Site Plan Alternative would develop Site B with less intensive uses than with the Proposed Project, and these would also be compatible with the surrounding area. However, with Site B developed primarily with parking and open space uses, this alternative would not generate comparable levels of vibrancy and economic activity south of Hempstead Turnpike. Additionally, the Applicant is confident that the Proposed Project's layout would better maximize the economic potential of the Project Sites as compared to this alternative. Overall, this alternative would not substantially avoid or reduce project-related significant adverse impacts, and would be less effective in meeting the State's development objectives for the Project Sites. ✷