



Memorandum:

To: Hon. Thomas Scott, Chairman
and Members of the City of Glen Cove Planning Board

Project Name: Garvies Point Waterfront Redevelopment Phase II

N&P Project No.: 15122

Date: February 3, 2017

Subject: RXR Response to Public Comments on Phase II

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Cc: Planning Board Consultants

We have had an opportunity to review the Phase II Public Comment letters received by the Planning Board, and the response letter prepared by the Applicant and its consultants. We concur with the responses provided by the Applicant.

We recognize that many of the responses in the Applicant's letter were highly technical in nature. Therefore, for the Planning Board's convenience, we have summarized the Applicant's responses, as follows:

1. *Stormwater System/Residual Contamination:* The stormwater collection, conveyance and treatment system, including the biofiltration systems (raingardens), have been designed as "closed systems," which do *not* allow for the interaction of stormwater with the underlying groundwater and/or soils. The proposed stormwater management system will provide pollutant removal through the combination of the Jellyfish and green infrastructure practices.
2. *Jellyfish Technology:* The Jellyfish Filter is an accepted technology in New York State. The drainage system has been designed to include the Jellyfish Filters, along with green roofs, biofiltration areas (raingardens), and irrigation chambers, which are all recommended practices in NYS. The overall system will *exceed* the design parameters and guidance of the NYS Stormwater Design Manual. This combination of stormwater management practices was designed to reduce stormwater runoff pollutant, nutrient and pathogen loadings to Hempstead Harbor and Glen Cove Creek. This is a significant improvement compared to existing conditions, as the site currently has no stormwater management.
3. *County Waiver:* The issuance of a waiver from Nassau County from an 8-inch design requirement to a 2-inch storm event is appropriate for the project drainage given the site's proximity to the Glen Cove Creek and Hempstead Harbor; stormwater discharges from the site do not have the potential to cause downstream flooding impacts to the Creek or adjacent properties.
4. *Sea Level Rise:* The project's proposed buildings have all been designed with their lowest floor elevations a minimum of 2-feet above the FEMA 100-year flood elevation. This is

significantly higher than a 6 to 10-inch sea rise, which was the concern raised in the comment letters. The drainage system outfalls include in-line valves that are designed to prevent seawater from entering into the stormwater system during high water conditions, but still allow the stormwater systems to continue to function.

5. *Flooding:* The stormwater system piping is designed to collect and convey stormwater runoff from a 4.8-inch storm event (while providing water quality treatment for the first 2" rainfall). During storms with greater than 5" of rainfall (which have a frequency of occurring once every ten or more years), there may be instances where stormwater may pond at some localized low points on site. The exhibit prepared by the Applicant's engineer, clearly demonstrates the areas of maximum ponding on the site when the design rain event is exceeded; this ponding would be temporary and will have minimal impact on the project residents.
6. *Stormwater Maintenance:* All stormwater treatment and conveyance systems require routine maintenance. The maintenance requirements for the Jellyfish filters are not overly burdensome, as stated in the comment letters.
7. *Compliance with DEC Stormwater Manual:* The project's stormwater design incorporates NYSDEC accepted technologies and green infrastructure practices (green roofs, biofiltration/raingardens and cisterns), which are designed to exceed the NYSDEC requirements.
8. *Dredging/bulkheads:* Any potential impacts associated with dredging in the Creek for construction of the bulkheads or other water improvements will be adequately mitigated pursuant to a NYSDEC approved Dredging and Excavation Work Plan. It will be designed to protect the water quality of the adjacent waterbodies, including the Creek. We will be assisting the Building Department review the bulkhead design prior to issuance of building permit for the bulkhead.
9. *DEC wetland jurisdiction:* DEC has properly asserted its jurisdiction for the subject property. The project will result in over 100,000 square-feet of wetland creation and restoration, resulting in improved and expanded tidal wetland habit areas. The loss of habitats and associated ecological benefits from open fields and standing water were addressed in both the DEIS and FEIS and does not warrant further study.
10. *Supplemental EIS:* The Project as currently proposed does not present any significant changes as compared to what was studied during the prior SEQRA review, and decided in the Findings Statement. We have made sure that the modified stormwater plan satisfies the storage and treatment requirements of the Findings.

In conclusion, it is our opinion that the Applicant and its consultants have adequately responded to the Public comments.

Please let us know if you have any questions.