

The Belmont Park Community Coalition (BPCC)
P.O. Box 30285, Elmont, NY 11003
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Website: www.elmont.org

June 25, 2019

RE: Proposed Belmont Park Redevelopment Project

Delivery via email:

Dear Governor Cuomo,

We, the Belmont Park Community Coalition (BPCC), write to express our opposition to New York Arena Partners' proposal for a new stadium and mixed-use facility for the National Hockey League's Islanders hockey team. We are a grassroots group of residents and community organizations focused on preserving and advancing the Long Island community of Elmont and the surrounding neighborhoods. We have the staunch support of dozens of local leaders, including elected officials and civic associations in the area. We represent the concerns of thousands of residents in the villages and unincorporated communities of western Long Island who believe that this development will bring many burdens to our community and no concrete sustainable benefits. The future of our community is at stake.

Our Coalition is once again taking the opportunity to express the reasons why this publicly subsidized project should not move forward against the wishes of the very community who must live with the development and its impact for decades to come. To be clear, we are supportive of smart growth for economic development. The proposed development must enhance our residents' quality of life. We are not supportive of any development project that would detract from available services or burden the infrastructure our community currently relies on. In addition to our concerns about the impacts of the proposed stadium project on traffic, infrastructure and the environment and the lack of concrete economic and other benefits for our community, we do not feel that the developers or Empire State Development Corporation have adequately consulted with community members.

In fact, in 2008, our communities began the process of planning new land uses for the area - as prescribed by law. We developed an Elmont Community Vision Plan that took the needs of the neighborhood into consideration and was grounded in an extensive history of idea sharing and consensus building. The Empire State Development Corporation should carefully incorporate community input through the mechanisms set forth in the Urban Development Corporation Act for a project of this magnitude and scale. Yet, to date, this has not happened. Instead, in pushing the Arena Partners' mixed-use stadium project, the Empire State Development Corporation has largely overlooked the key stakeholders in Elmont and surrounding neighborhoods, and disregarded our vision for community-centered, community-led development set forth in the Vision Plan. They have disregarded the UDC act, and the binding 2008 Vision Plan.

OUR COMMUNITY

Elmont is a very special community with a dynamic and growing population. Elmont and the surrounding neighborhoods are racially diverse and middle income. According the Census

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Bureau's American Community Survey, the median household income is over \$94,000 per year and a low poverty rate. Close to 80% of the housing is owner occupied with a median property value of \$374,000.¹ The community takes pride in its high achieving school and library districts with its admirable high school cohort graduation rate of 96%. Elmont is home to several thriving small businesses, cultural institutions and establishments. While we seek to preserve the character of our community, we acknowledge that preservation cannot be tantamount to stagnation. We seek growth and opportunity but must be included in any conversations about our collective future.

IMPACT ON INFRASTRUCTURE AND THE ENVIRONMENT

We are particularly concerned about the impact that the proposed stadium project would have on traffic, infrastructure and the environment. From diminished air quality and increased traffic to the depletion of our local water supply, these serious considerations that must not be overlooked. The Final Environmental Impact Statement (EIS) for this project could be submitted in the near future and we are concerned that many key issues will not be addressed.

The communities surrounding Belmont Park are keenly aware of the stresses the annual Belmont Stakes put on our infrastructure. Residents witness not only an increase in traffic, but have reported noise, air quality and even a decrease in the availability of running potable water. The traffic has even stalled an ambulance during an emergency. The neighborhood is already burdened with a high volume of traffic on a daily basis and lacks sufficient public transit – in particular, the Long Island Railroad fails to serve our community except on one day a year for the Belmont Stakes.

Water usage

The area is currently supplied with water from aquifers. Three key aquifers supply much of the water for all Long Island. The Water Authority of Western Nassau County supplies over 28,000 customers and serves over 120,000 individuals.² The water system is operating according to scale for the number of residents and visitors that are currently located in the region. The proposed project would significantly increase the demands on the water and sewage systems in the Elmont area. Although the draft EIS suggests that there will be a redirection of sewage from the site, there is no clear indication of where the additional sources of potable water will come from.

The only available sources that have the capacity to supply water to the proposed development would most likely come from the Water Authority of Western Nassau County. There have not been any clear discussions about how the additional infrastructure upgrades necessary to supply

¹ United States Census 2017 American Community Survey, <https://www.census.gov/programs-surveys/acs>

² http://www.wawnc.org/cm/index.php?option=com_content&task=view&id=12&Itemid=26

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this sustained surge in water use will be financed. Consider, for example, the 2008 Belmont Stakes that left many residents without water.³ It would be unacceptable for residents of the area to have to bear the burdens of increased water prices, water scarcity and stress on the sewage system because of a project that we explicitly do not want in the first place.

Traffic and air pollution

There can be no question that a stadium and mixed-use development will bring increased traffic to an area already plagued by high volumes of traffic, gridlock and resulting air pollution. The area depends on rapid transit from the Nassau Inter-County Express bus lines and does not have a Long Island Railroad Station that operates year-round to meet its current needs. Our neighborhoods are already burdened every summer by the influx of traffic during the annual Belmont Stakes. For example, in 2015, race organizers decided that they would even cap attendance to the Belmont Stakes because of the traffic gridlock, safety concerns and overall lack of space for the commuters.⁴ In order for the project to reap a return on its investment, it has to operate year-round. There has not been a complete analysis of the current traffic patterns or any simulations of the net effect of the anticipated increase in traffic. The project would only bring more traffic to the area that has the roadway that has been consistently ranked as the most dangerous in New York State – the Hempstead Turnpike. We are greatly concerned about the ambient air quality in the region. We are seeking a more comprehensive and in-depth review of the current and projected traffic patterns along with some insightful modeling (using proper and current tools) of the potential consequences on our air quality.

LACK OF CLEAR ECONOMIC BENEFITS FOR OUR COMMUNITY

BPCC has voiced its concerns about this project's outsized potential to negatively impact Elmont's economy. We remain concerned that this project will result in substantially reduced funding resources for Union Free School Districts, hurt local businesses, and have negligible—if not negative—effects on local tax revenue and per capita income. We believe that our concerns regarding the economic viability of this project and its potential for adverse economic impacts on our community have been disregarded and we demand that the Empire State Development Corporation evaluate the benefits to the local community based on real considerations set forth below, rather than on the presupposed benefits of the availability of lower waged and seasonal jobs.

³ Joshua Robinson, *Belmont Water Shortage Adds to Heat Problems*, N.Y. TIMES, Jun. 8, 2008, <https://www.nytimes.com/2008/06/08/sports/othersports/08weather.html>.

⁴ Melissa Hoppert, *To Avoid Last Year's Problems, Belmont Attendance to Be Capped*, N.Y. Times, May 6, 2015, <https://www.nytimes.com/2015/05/07/sports/to-avoid-last-years-problems-belmont-attendance-to-be-capped.html>.

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Impacts of the Payment in Lieu of Taxes (PILOT) incentives on the Elmont Union Free School District

Because New York state sets limits on local property tax increases and force localities to pursue PILOT agreements for development in their jurisdiction towards their tax cap calculation, this project's use of PILOT incentives has the potential to require Elmont to reduce the amount of taxes it levies for Elmont Union Free School District, The Sewanhaka Central High School District and the Elmont Public Library District. Our concern that this PILOT will diminish funding for our schools is shared by the New York State School Boards Association and supported by the experiences of other New York school districts, such as New Paltz and Ballston Spa, wherein PILOT agreements for development in their communities required them to reduce their tax levy.⁵ The problem is clear: "If PILOT payments increase, the amount of property taxes a school district is allowed to raise without exceeding its tax cap will decline, all other things being equal." *Id.* This is especially problematic because "[s]chool officials and other local governmental officials have no role in negotiating the terms of PILOTs."⁶ Further, the potential for a PILOT agreement to severely restrict school resources is exacerbated in smaller districts such as ours "where one business can have an outsized impact on the tax levy."⁷ Our high-performing schools are the pride of our Elmont community, and we cannot go blindly into a situation that may threaten future education funding. The impacts of any PILOT incentive on local revenue generation and school funding must be thought through before any development begins, and local community members and officials must have a meaningful voice in decision-making regarding PILOT incentives that may undermine our own local control and revenue generation authority in the future.

Lack of localized economic benefits from stadium projects

We do not see the potential for sustainable and meaningful economic benefits for our community stemming from the proposed mixed-use stadium project to justify the burdens it would place on us. Throughout the process, Empire State Development Corporation has asserted that the project will create jobs. But lower-wage service jobs in retail, food service and stadium maintenance are not the type of job growth that the professional and middle-class residents of Elmont need. Instead, we see the developers and owners of the project reaping benefits outside our community while we are stuck with the burdens.

⁵ See Paul Heiser, *Under tax cap, PILOTs pose new financial perils*, N.Y. STATE SCHOOL BOARDS ASSOCIATION (Sept. 22, 2014), <https://www.nyssba.org/news/2014/09/18/on-board-online-september-22-2014/under-tax-cap-pilots-pose-new-financial-perils/>.

⁶ *Id.*

⁷ See Lissa Harris, *Are PILOTS A Race to the Bottom*, THE RIVER NEWS ROOM (Mar. 6, 2019), <https://therivernewsroom.com/2019/03/06/are-pilots-a-race-to-the-bottom/>.

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The assertion that this project will generate economic activity for surrounding communities is simply not supported by economists' findings or empirical evidence from other communities that have hosted new stadiums or arenas. Studies of the economics of sports facilities (with data spanning decades) overwhelmingly show that such facilities spur scant economic benefits for the governments that subsidize them and the communities that house them. These projects often have sustained negative economic effects.⁸ One comprehensive study of the growth effects of sports franchises concludes that "sports-led development is unlikely to succeed in making a community richer" and that if the government is truly "looking for a policy to foster economic growth, far better candidate policies exist than those subsidizing a professional sports franchise."⁹

The retail component of this project does nothing to save it. The economic viability of brick and mortar retail has long been declining in this country and Elmont is no exception.¹⁰ We are sincerely concerned that there is not sufficient demand to sustain the retail or arena aspects of this project as there are numerous competing facilities nearby that are more accessible by public transit and car.

EXPLORING ALTERNATIVES

We would be happy to work with Empire State Development Corporation on a more inclusive process to come up with a better use for this property that would substantially and sustainably benefit the people who live here. The Islanders team already has a viable option for its franchise in Nassau County. Their current facility could be upgraded to meet their needs. The current proposal could be scaled down significantly and developed in a way that is more in line

⁸ See e.g. Dennis Coates, *Growth Effects of Sports Franchises, Stadiums, and Arenas: 15 Years Later*, GEORGE MASON UNIVERSITY MERCATUS CENTER (Sept. 2015), <https://www.mercatus.org/system/files/Coates-Sports-Franchises.pdf>; Scott A. Wolla, *The Economics of Subsidizing Sports Stadiums*, FED. RESERVE BANK OF ST. LOUISE (May 2017), <https://research.stlouisfed.org/publications/page1-econ/2017-05-01/the-economics-of-subsidizing-sports-stadiums/>; Pat Garofalo and Travis Waldron, *If You Build It, They Might Not Come: The Risky Economics of Sports Stadiums: The trials of the Phoenix Coyotes, the least popular hockey team in the NHL, offer a lesson in public debt and defeat*, THE ATLANTIC (Sept. 7, 2012), <https://www.theatlantic.com/business/archive/2012/09/if-you-build-it-they-might-not-come-the-risky-economics-of-sports-stadiums/260900/>.

⁹ Coates. at 24.

¹⁰ See Dominic Rushe, *Big, bold... and broken: is the US shopping mall in a fatal decline?*, THE GUARDIAN (July 23, 2017), <https://www.theguardian.com/us-news/2017/jul/22/mall-of-america-minnesota-retail-anniversary> ("Of 1,200 [malls] across the country, just 50% are expected to be in business by 2023").

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with local growth and economic development needs. Our goal is not to hinder, but to encourage strategic and sustainable planning for our region.

CONCLUSION

We feel that any development that is devoid of community input serves more as an imposition as opposed to an opportunity. Several key parts of the New York State 2018 Opportunity Agenda mentioned the very principles that we are trying to uphold, including improvements to our infrastructure, expanding community access to open space and protecting our resources, like water. We hope to work with your office and the Empire State Development to ensure that these goals come to fruition for all communities across the state and particularly in Elmont. In the meantime, however, and pending the release of the FEIS, BPCC will work to preserve the rights of the surrounding communities of Belmont Park.

Thank you.

Sincerely yours,

Tammie S. Williams, LMSW
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Elmont Civic Leader

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Elmont Civic Leader

Sheila Moriarty
Bellerose Terrace Civic Leader

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Matthew Sexton, LMSW
Floral Park Civic Leader

Joyce Stowe, President
Elmont Tudor Manor Civic Association
Representing 800 homes

Cheryl Lee, President
Elmont Parkhurst Civic Association
Representing 900 homes

Bob Barker, President
Elmont Locustwood/Gotham Civic Association
Representing 1200 homes

Bryan Block, President
Cambria Heights Civic Association
Representing 18,176 homes

Richard Hellenbrecht, Civic Leader
Bellerose Commonwealth Civic Association
Representing 1200 homes

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