

FINAL SUPPLEMENTAL  
ENVIRONMENTAL IMPACT STATEMENT  
VOLUME 1 OF 2

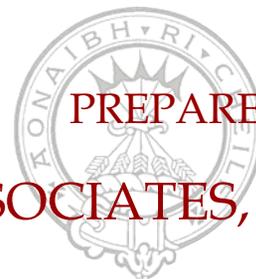
PREPARED FOR  
CANON, U.S.A, INC.



FOR

CANON, U.S.A., INC.  
TOWN OF HUNTINGTON  
SUFFOLK COUNTY, NEW YORK

PREPARED BY  
CAMERON ENGINEERING & ASSOCIATES, LLP



JUNE 2009

**FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT**  
for  
**Canon U.S.A., Inc.**

Southwest corner of Long Island expressway South Service Road  
and Walt Whitman Road  
Town of Huntington, Suffolk County, New York

**LEAD AGENCY:  
CONTACT:**

**TOWN OF HUNTINGTON**  
Mr. Anthony Aloisio  
Director of Planning & Environment  
100 Main Street  
Huntington, N.Y. 11743  
Phone: (631) 351-3196

**APPLICANT:  
CONTACT:**

**CANON U.S.A., INC.**  
Mr. Laurence Giglio  
Director – General Affairs Division  
One Canon Plaza  
Lake Success, NY 11042  
Phone: (516) 328 4717

**ATTORNEY:**

**RUSKIN MOSCOU FALTISCHEK, P.C.**  
Edward A. Ambrosino  
East Tower, 15th Floor  
1425 RexCorp Plaza  
Uniondale, NY 11556-1425  
Phone: (516) 663-6675

**PREPARED BY:  
CONTACTS:**

**CAMERON ENGINEERING & ASSOCIATES, LLP**  
Janice Jijina, P.E., AICP and David Berg, AICP  
100 Sunnyside Boulevard, Suite 100  
Woodbury, New York 11797  
Phone: 516-827-4900  
Environmental

**BOHLER ENGINEERING, PC**  
Thomas J. Filazzola, P. E.  
2002 Orville Drive North  
Suite 100  
Ronkonkoma, NY 11779  
Phone: (631) 738-1200  
Site Engineering

**ATLANTIC TRAFFIC & DESIGN ENGINEERS, INC.**

Charles D. Olivo, P.E., PTOE  
2002 Orville Drive North - Suite 100  
Ronkonkoma, New York 11779  
Tele: 631.738.1919  
Traffic

**WSP ENVIRONMENTAL STRATEGIES**

Andrew McKee  
475 Fifth Avenue  
New York, NY 10017  
Phone: (917) 273-9967  
Noise and Air

**HOK**

Gregory Smith  
620 Avenue of the Americas  
New York, New York 10011  
Phone: (212) 981-1200  
Architecture

**WHITESTONE ASSOCIATES, INC.**

35 Technology Drive  
Warren, NJ 07059  
Phone: (908) 668-7777  
Soil Management

## TABLE OF CONTENTS

### VOLUME I

<b>1.</b>	<b>INTRODUCTION</b>	<b>1-1</b>
<b>2.</b>	<b>PROJECT REVISIONS</b>	<b>2-1</b>
2.1	SITE PLAN AND BUILDING .....	2-1
2.2	PARKING .....	2-1
2.3	STORMWATER COLLECTION, TREATMENT AND RECHARGE .....	2-2
2.4	UTILITIES .....	2-3
2.5	LEED .....	2-4
2.6	SOIL MANAGEMENT PLAN .....	2-6
2.7	TRAFFIC .....	2-6
<b>3.</b>	<b>TRANSPORTATION</b>	<b>3-1</b>
3.1	TRAFFIC - EXISTING CONDITIONS .....	3-1
	3.1.1 Roadway and Intersection Descriptions .....	3-1
	3.1.2 Traffic Counts .....	3-2
	3.1.3 Level of Service and Capacity Analysis .....	3-3
3.2	TRAFFIC – FUTURE CONDITIONS WITHOUT THE PROPOSED PROJECT .....	3-4
	3.2.1 Future Base Conditions .....	3-4
	3.2.2 Future Roadway Improvements .....	3-5
	3.2.3 Other Planned Development .....	3-6
	3.2.4 Future No-Build Traffic Volumes .....	3-7
3.3	TRAFFIC – FUTURE CONDITIONS WITH THE PROPOSED PROJECT .....	3-7
	3.3.1 ITE Trip Generation .....	3-7
	3.3.2 Trip Distribution .....	3-7
	3.3.3 Future “Build” Traffic Volumes .....	3-8
	3.3.4 Future “Build” Traffic Analysis .....	3-8
3.4	TRAFFIC - RECOMMENDED MITIGATION .....	3-10
	3.4.1 Signalized Intersections Analyzed with HCS+ Software .....	3-11
	3.4.2 Signalized Intersections Analyzed with Synchro Software .....	3-13
	3.4.3 Old Walt Whitman Road – Coordinated Traffic Signal Network .....	3-18
	3.4.4 Unsignalized Intersections Analyzed with HCS+ Software .....	3-20
	3.4.5 Unsignalized Intersections Analyzed with Synchro Software .....	3-21
	3.4.6 Roadway Mitigation Summary .....	3-22
3.5	ON-SITE CIRCULATION ANALYSIS .....	3-23
3.6	WEAVING ANALYSIS .....	3-24
3.7	CORPORATE TRIP REDUCTION INITIATIVES .....	3-25
3.8	SITE ACCESS AND CIRCULATION .....	3-27
3.9	TRAFFIC STUDY CONCLUSIONS .....	3-29
3.10	PARKING .....	3-30
	3.10.1 Existing Conditions .....	3-30
	3.10.2 Potential Impacts of Proposed Project .....	3-30
	3.10.3 Proposed Mitigation .....	3-31
<b>4.</b>	<b>COMMENTS AND RESPONSES</b>	<b>4-1</b>
4.1	GENERAL COMMENTS .....	4-1
4.2	STORMWATER COLLECTION, TREATMENT AND RECHARGE .....	4-3
4.3	ECOLOGICAL RESOURCES .....	4-5
4.4	LAND USE AND ZONING .....	4-6

4.5	PARKING .....	4-6
4.6	TRANSPORTATION .....	4-7
	4.6.1 Traffic Impact Analysis Methodology.....	4-7
	4.6.2 Trip Reduction Initiatives – Carpool/Transit.....	4-29
	4.6.3 On-Site Circulation.....	4-31
	4.6.4 Site Access Management Plan .....	4-32
	4.6.5 Off-Site Roadway Improvement Measures.....	4-37
	4.6.6 Area-Wide Roadway Infrastructure Funding/Schedule .....	4-52
	4.6.7 Right-of-Way / Real Estate / Utility .....	4-61
4.7	AIR QUALITY .....	4-63
4.8	NOISE .....	4-65
4.9	CULTURAL RESOURCES .....	4-65
4.10	LEED .....	4-67
4.11	COMMUNITY SERVICES.....	4-68
4.12	UTILITIES.....	4-70
4.13	SOCIOECONOMICS.....	4-71
<b>5.</b>	<b>MITIGATION MEASURES</b>	<b>5-1</b>

**LIST OF FIGURES**

Figures Located at the End of Each Chapter

- Figure 1-1 - Building Areas and Phasing
- Figure 2-1 – Master Plan
- Figure 2-2 – Canon Headquarters Main Building Façade
- Figure 4-1 – Rendered Master Plan
- Figure 4-2 – Steep Slope Analysis and Proposed Conservation Easement

**LIST OF TABLES**

Table 2-1 - Parking Requirements .....	2-2
Table 2-2 - Stormwater Drainage Calculations .....	2-2
Table 2-3. Estimated Water Use and Wastewater Flow for Full Build Out.....	2-3
Table 2-4. Estimated Solid Waste Generation.....	2-3
Table 3-1 - Existing Conditions Analysis Utilizing HCS+ Software (HCM Methodology) .....	3-3
Table 3-2 - Existing Conditions Analysis Utilizing Synchro Software (Synchro Methodology).....	3-3
Table 3-3 - Existing Conditions Analysis for Unsignalized Intersections(HCM Methodology) .....	3-4
Table 3-4 - Existing Conditions Analysis for Unsignalized Intersections (Synchro Methodology).....	3-4
Table 3-5 - Trip Generation for the Proposed Project .....	3-7
Table 3-6 - No-Build and Build Analysis for Signalized Intersections (HCM Methodology) .....	3-9
Table 3-7 - No-Build and Build Analysis for Signalized Intersections (Synchro Methodology).....	3-9
Table 3-8 - No-Build and Build Analysis for Unsignalized Intersections (HCM Methodology).....	3-9
Table 3-9 - No Build and Build Analysis for Unsignalized Intersections (Synchro Methodology) .....	3-9
Table 3-10 - Signalized Intersections - No-Build with Improvements & Build with Mitigation (HCM Methodology).....	3-12
Table 3-11 - Signalized Intersections - No-Build with Improvements & Build with Mitigation (Synchro Methodology).....	3-18
Table 3-12 - Cycle Length and Offset Parameters.....	3-20
Table 3-13 - Unsignalized Intersections - No-Build with Improvements & Build with Mitigation (HCM Methodology).....	3-20
Table 3-14 - Unsignalized Intersections - No-Build with Improvements & Build with Mitigation (Synchro) .....	3-22
Table 3-15 - On-Site Unsignalized Intersections - Build Analysis (HCM Methodology).....	3-24
Table 3-16 - On-Site Unsignalized Intersection - Build with Mitigation Analysis (Synchro Methodology) .....	3-24
Table 3-17 - Parking Requirements.....	3-31
Table 4-1 –Bulk Dimensions for Required and Provided Light Industry Zoning.....	4-4
Table 4-2 - LIE North Service Road & Old Walt Whitman Road Traffic Volume Data.....	4-28
Table 4-3 - LIE South Service Road & Old Walt Whitman Road Traffic Volume Data.....	4-28

## **APPENDICES**

Appendix A – Hearing Transcript

Appendix B – Comment Letters and Correspondence

Appendix C – Air Quality Screening

Appendix D – Revised Soil Management Plan Resolution

Appendix E – Flow Test

Appendix F – Suffolk County Tax Map

## **VOLUME 2**

Appendix G – Traffic Study

## **1. Introduction**

This document is a Final Supplement to the Melville-Route 110 Area Generic Environmental Impact Statement (GEIS) and Findings Statement adopted by the Huntington Board in 1989 and the Town of Huntington Comprehensive Plan Update adopted April 21, 1993. The proposed project is in compliance with the Horizons 2020 Comprehensive Plan Update, adopted December 9, 2008.

Canon U.S.A., Inc., (sometimes referred to herein as “Canon USA” or “Canon”) a wholly owned subsidiary of Canon Inc., plans to build a new facility in Melville New York that would serve as its North and South American headquarters. The 52.17-acre Canon site is located on the south side of the Long Island Expressway South Service Road, on the west side of Old Walt Whitman Road in the Town of Huntington. The site is in the unincorporated hamlet of Melville, within the Town of Huntington, New York (Tax Map Nos. 400-254-1-4, 400-254-1-9, 400-254-2-4 and 400-254-2-49). The site is currently vacant.

The facility will be a showcase for Canon’s high-tech products and will provide in-house technical solutions for software and hardware applications. Canon is actively pursuing a minimum of a “Silver” LEED certification for the facility. The new center would be consistent with Canon’s overriding corporate philosophy of promoting sustainability.

The project will be completed in two (2) phases. Phase I will include construction of an approximately 696,000 square foot (668,573 square foot GFA), partial six story, office building and two (2) parking garages. The North Parking Garage, which is closest to the south service road of the Long Island Expressway, will be three stories tall and hold 780 parking spaces. The South Parking Garage will be three stories tall and hold 802 parking spaces. If needed, a parking garage expansion to the North Garage of 441 spaces would be built as Phase 1A.

Phase II will include construction of an addition to the North Garage (directly behind the Phase I North Parking Garage) to accommodate a 649 spaces (plus the 441 spaces of Phase 1A) and an additional partial six story approximately 204,000 square foot (194,680 square foot GFA) office building located directly behind the North Office Building. Figure 1-1 shows the components of each phase.

The Town of Huntington accepted the Draft Supplemental Environmental Impact Statement on September 3, 2008, held a public hearing on the DSEIS on October 1, 2008, and accepted public comment on the DSEIS though October 24, 2008.

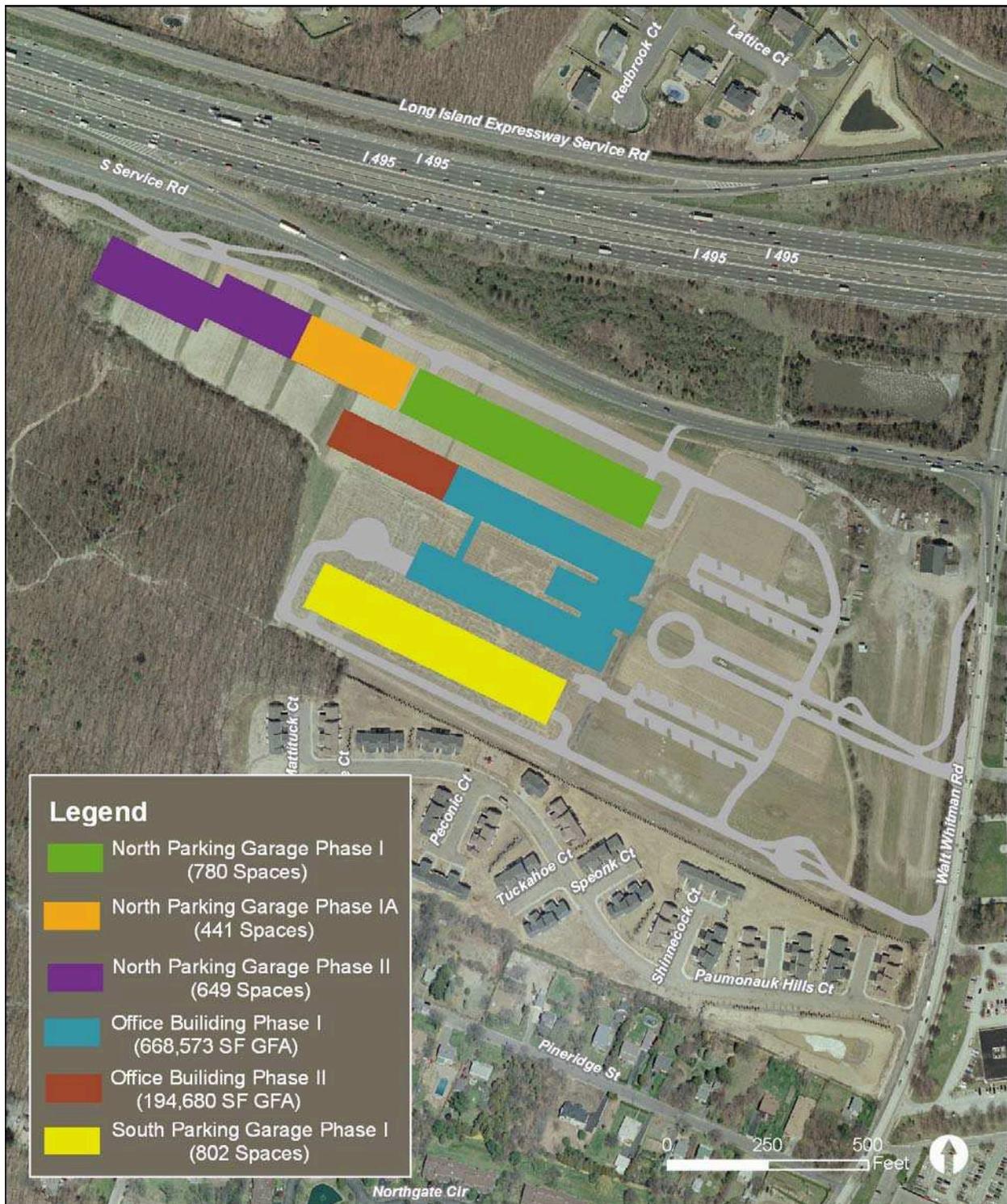
This Final Supplemental Environmental Impact Statement (FSEIS) addresses concerns raised during the SEQRA Hearing and written comments received during the public comment period on the Draft SEIS. The Draft SEIS is incorporated into this document by reference.

The State Environmental Quality Review Act 617.9(b)(8) states that:

*A final EIS must consist of: the draft EIS, including any revisions or supplements to it; copies or a summary of the substantive comments received and their source (whether or not the comments were received in the context of a hearing); and the lead agency's responses to all substantive comments. The draft EIS may be directly incorporated into the final EIS or may be incorporated by reference. The lead agency is responsible for the adequacy and accuracy of the final EIS, regardless of who prepares it. All revisions and supplements to the draft EIS must be specifically indicated and identified as such in the final EIS.*

Chapter 2 of the FSEIS describes changes to the project and Site Plan resulting from comments received. Chapter 3 provides a replacement of DEIS Chapter 8 – Transportation in its entirety. Chapter 4 of the FSEIS summarizes and responds to all of the substantive comments received through the SEQRA public hearing and public comment period. Chapter 5 summarizes the mitigation measures associated with the proposed project. A complete copy of the hearing transcripts and the written comments is provided in the Appendix.

Figure 1-1. Building Areas and Phasing



## 2. Project Revisions

Comments were received from various Town of Huntington Departments and outside agencies (the “Comments”) that resulted in changes and clarifications to the Site Plan and buildings. At the same time, the site plan and building design, as amended to respond to the Comments, was advanced by Canon. The following describes the general changes to the project identified by the applicant since the DEIS. These changes will be verified by the Town as part of the site plan review process once revised plans are submitted. Since the site plan is still under review by the Town, it may undergo further revisions.

### 2.1 Site Plan and Building

While many specific engineering details were revised, the overall site plan concept is almost identical to that shown in the DEIS. The revised Site Master Plan is provided in Figure 2-1.

The green screen on the south face of the south garage facing the residential neighborhood has been eliminated and replaced with two rows of densely planted evergreens planted seven feet on center. Approximately 300 additional trees were added to the site plan. A rainwater harvesting tank has been added to the south west corner of the office building for make-up water for the cooling towers and for irrigation of the front lawn. Composters and recycling containers with screens have been added to the southwest area of the office building. The exterior wall glazing has been reduced which will increase the building energy efficiency. A revised rendering is provided in Figure 2-2.

### 2.2 Parking

While the overall size of the buildings remained constant at 900,000 square feet, the gross floor area (GFA) calculation was clarified and resulted in a lower parking requirement. The project will be completed in phases. Figure 1-1 shows the components of each phase.

- Phase I will include construction of an approximately 696,000 square foot (668,573 square foot GFA), partial six story, office building and two (2) parking garages. The North Parking Garage, which is closest to the south service road of the Long Island Expressway, will be three stories tall and hold 780 parking spaces. The South Parking Garage will be three stories tall and hold 802 parking spaces. If needed, a parking garage expansion to the North Garage of 441 spaces would be built as Phase 1A.

- Phase II will include construction of an addition to the North Garage (directly behind the Phase I North Parking Garage) to accommodate a 649 spaces (plus the 441 spaces of Phase 1A) and an additional partial six story approximately 204,000 square foot (194,680 square foot GFA) office building located directly behind the North Office Building..

The revised parking requirements are shown in Table 2-1.

**Table 2-1 - Parking Requirements**

ITEM	PERMITTED	PROPOSED
Phase I	1 Space/300 sf x 668,573 sf = 2,229 Spaces	North Garage 780 spaces South Garage 802 spaces At Grade Lots 206 spaces Landbanked * 441 spaces Total 2,229 spaces
Phase II	1 Space/300sf x 194,680 sf = 649 Spaces	North Garage 649 spaces
Total	1 Space/300sf x 863,253 sf = 2,878 Spaces	2,878 spaces

\*Landbanked spaces will be built in Phase 1A if needed, or as part of Phase II.

### 2.3 Stormwater Collection, Treatment and Recharge

In response to Town Comments the drainage calculations for Phase I have changed slightly and a revised table is provided in Table 2-2. The proposed Phase I development of the 52.17-acre site will result in 35.91 acres of pervious surface area (69 percent of the site) and 16.26 acres of impervious surface area (31 percent of the site).

**Table 2-2 - Stormwater Drainage Calculations**

System Name	Area	Tributary Areas (SF)	Storage Required (CF)	Storage Provided in Ponds (CF)	Storage Depth Required Via Drywells (VF)	Storage Depth Provided Via Drywells (VF)	Total Storage Provided (CF)
A	Pavement Roof Landscape Pond	335,808 298,907 777,539 48,600	133,324.3	401,412	0.0	195	401,412 + 19,672 421,084
B	Pavement Landscape	24,485 20,133	11,460.4	0	113.6	119	12,005
C	Landscape Landscape Off Site	241,822 49,672	7,287.4	47,184	0.0	67.8	47,184 + 6,840 54,024
D	Landscape Landscape Off Site	441,484 744,609	29,652.3	87,105	0.0	76	87,105 + 7,667 94,772
E	Pavement Landscape	10,400 19,350	2,217.1	0	22.0	42	4,237
F	Pavement Landscape	38,880 14,800	6,850.0	0	67.9	90	9,079

## 2.4 Utilities

Since the floor plans of the buildings were modified slightly, including minor changes between office and industrial spaces and a decrease in cafeteria size, the water and wastewater calculations were revised and are slightly less (57,649 vs. 58,566). However, as availability letters were already obtained for 60,000 gallons per day for the 900,000 square foot project, any decrease would still fall with the available capacity.

**Table 2-3. Estimated Water Use and Wastewater Flow for Full Build Out**

Use	Floor Area SF	Cafeteria Users	Total Flow Rate	Total Flow GPD
Non-medical office	648,361		0.06 GPD/SF	38,902
Cafeteria (integral to office)	20,355	3,000	2.50 GPD/capita	7,500
General Industrial	28,368		0.04 GPD/SF	1,135
Fitness Center w/shower	4,122		0.30 GPD/SF	1,237
Medical Office	123		0.10 GPD/SF	12
Industrial	8,343		0.04 GPD/SF	334
Industrial	144,500		0.04 GPD/SF	5,780
Non-medical office	19,461		0.06 GPD/SF	1,168
Non-medical office	26,100		0.06 GPD/SF	1,566
Non-medical office	267		0.06 GPD/SF	16
<b>Total</b>	<b>900,000</b>			<b>57,649</b>

**Assumptions:**

- 1- Cafeteria per capita number based on the entire building population per SCDHS requirements.
- 2- Parking garages are an outdoor, unheated space and do not contribute any sanitary waste.
- 3- Restrooms, elevators and stairwells have been included at office flow rate.
- 4- Work rooms, receiving space and utility areas have been computed at industrial rate.

Solid waste also changed slightly due to the floor plan modifications as shown in Table 2-4 (9,616 pounds vs. 9,363 pounds).

**Table 2-4. Estimated Solid Waste Generation**

Space	Use:	Floor Area (SF)	Users	Rate (LB/SF-D)	Total (LB/D)
Office	Non-Medical Office	648,361		0.006	3,890
Cafeteria	Cafeteria (lbs per user)	20,355	3000	1	3,000
Work Rooms	Warehouse	28,368		0.01	284
Fitness Center	Fitness Center w/shower	4,122	270	1	270
First Aid	Medical Office	123		3	369
Loading/Receiving areas	Warehouse	8,343		0.01	83
Utility Space	Warehouse	144,500		0.01	1445
Elevators and Stairwells	Non-Medical Office	19,461		0.006	117
Restrooms	Non-Medical Office	26,100		0.006	157
Guard Booths	Non-Medical Office	267		0.006	2
<b>Total</b>		<b>900,000</b>			<b>9,616</b>

**Assumptions:**

- 1- Cafeteria per capita number is based on the entire building population per SCDHS requirements.
- 2- Parking garages are an outdoor, unheated space and do not contribute any solid waste.
- 3- Restrooms, elevators and stairwells have been included at office flow rate.
- 4- Work rooms, utility, and receiving space has been computed as warehouse.
- 5- Fitness Center computed as school with cafeteria and 10% of occupants using per day

## 2.5 LEED

Canon will achieve Leadership in Energy and Environmental Design (LEED) silver certification for new construction for the project. The LEED for New Construction Rating System is designed to guide and distinguish high-performance commercial and institutional projects, including office buildings, high-rise residential buildings, government buildings, recreational facilities, manufacturing plants and laboratories. Silver certification requires 33-38 points. Canon is proposing 36 points, which will allow the building to achieve silver certification even if up to three credits are ultimately not obtained. The 36 targeted credits are apportioned as follows:

Sustainable Sites	11 credits
Water Efficiency	3 credits
Energy & Atmosphere	4 credits
Materials & Resources	4 credits
Indoor Environmental Quality	11 credits
Innovation & Design Process	3 credits
TOTAL	36 credits

Following are some of the items in Phase I and Phase II that will contribute to LEED credit for the proposed development.

Stormwater - The stormwater management system for Phase I has been designed so that 100% of stormwater runoff from a 100-year 24-hour storm will be contained on-site, exceeding the LEED standard. A variety of stormwater quality measures are proposed, including bio-swales to treat runoff from the surface parking areas and stormwater quality units to remove silt and hydrocarbons from runoff from the on-site roadways. Similar design parameters will be utilized for the Phase II stormwater management system.

Construction Materials - The proposed base course for the paved areas on-site will consist of locally recycled RCA (Recycled Concrete Aggregate). All proposed drainage piping will be ADS MegaGreen ST Corrugated Polyethylene Pipe, which has a minimum recycled content of 40%. The proposed fencing will include recycled materials.

Lighting - The lighting plan was designed to provide security, enhance the night-time appearance of the site and achieve the LEED light pollution reduction credit. The LEED credit requires designers to minimize light trespass from buildings and the site, reduce sky-glow, improve nighttime visibility, and reduce the impact on nocturnal wildlife. To

meet local lighting requirements and avoid light pollution, all proposed site lighting will be full cutoff.

The Canon USA lighting plan minimizes site lighting. Although the USGBC credit allows for 1 footcandle (FC) of light trespass ten (10) feet onto neighboring property, the Canon USA plan provides zero (0) FC of light at the site perimeter. Minimal lighting is provided along the southern site perimeter adjacent to the residential area. Lighting along the drive to the South Garage is 0.5 FC except at the guard booth and two (2) entrances, where it is 2.0 FC. Those three areas require slightly more lighting for security and accident prevention. The entire surface parking area is illuminated at the minimum of 0.5 FC. Other than interior intersections and guard booths, where 2.0 FC is provided, the remainder of the site lighting is designed for 0.5 FC.

Pavement - To reduce the heat island effect, the majority of site parking will be under cover and in parking garages. In addition, shade trees are proposed to cover the asphalt-paved surface parking area.

Public Transportation - The site is located on the MTA/Long Island Bus N95 route. A bus stop fronting the site on Walt Whitman Road is being considered. In addition, a private shuttle bus may be provided to transport employees to and from the nearest Long Island Railroad station

Habitat Protection - A multi-story building and multi-story parking garages are proposed to maximize open space. The amount of open space provided exceeds the LEED standard of 20% of the site area. In addition, over 60% of the steep slope/hillside area of the site (defined as any area steeper than 10% slope) is being preserved.

Water Conservation - Water conservation methods would reduce consumption of public water. Canon will utilize water efficient landscape plantings, primarily natives that will not require irrigation after initial establishment. This kind of landscaping will reduce water use associated with the grounds by 50 percent to meet the Water Efficient Landscaping requirements of LEED silver certification. Permanent irrigation will only be used for the entryway area. The irrigation system, used only seasonally, would be tied to moisture sensors and limited to the early morning to reduce unnecessary water consumption caused by evaporation losses. Drip irrigation would be utilized wherever possible in those areas specified for irrigation. The facility will also reduce water use through the installation of efficient fixtures, automatic, no touch faucets, and other water-saving devices.

Energy - Canon plans to achieve LEED points in the Energy and Atmosphere categories through the use of technologies such as, energy recovery, high efficiency equipment, advanced HVAC and lighting controls and sensors, and photo-dimming. Other energy-savings strategies will include use of low-wattage fluorescent bulbs; lighting reflectors; installation of high R-value wall and ceiling insulation; variable speed fans and pumps; vestibules; locating total building control systems in the basements of the office buildings; and implementation of enhanced commissioning and enhanced refrigerant management.

## 2.6 Soil Management Plan

The Town of Huntington Planning Board approved a Soil Management Plan (SMP) at its August 20, 2008 Meeting. Several amendments were required to clarify applicant requirements with respect to the implementation of the SMP and a revised resolution was adopted on October 22, 2008. A copy of the resolution is provided in Appendix D. The clarifications were as follows:

- Arsenic impacted soils will be placed beneath the proposed lined ponds, concrete building slabs, and asphalt/concrete roadways or walkways, or covered with a 6-inch to 12-inch thick cap of clean soil/topsoil and vegetated as required.
- The blending of soils as proposed in the SMP is not anticipated, however, should blending be utilized the blending operations will be completed in accordance with the SMP and any blended soils utilized as surface cover will not contain arsenic at a concentration that exceeds the SCDHS Guidance of 4 ppm.
- To demonstrate adequate reductions in soil contamination, remedial work and confirmatory end point sampling and analysis should, to the greatest extent possible, be completed prior to beginning normal construction operations. All remedial work must be completed prior to the issuance of a Certificate of Occupancy.

## 2.7 Traffic

The majority of the comments received on the DSEIS concerned traffic issues. A revised Traffic Impact Assessment (June 2009) is provided in Appendix G. In order to be clear, Chapter 8 of the DSEIS is replaced in its entirety as Chapter 3 herein.



**Figure 2-2. Canon Headquarters Main Building Façade**



Source: HOK

### 3. Transportation

A Traffic Impact Analysis was conducted for Canon USA and revised December 11, 2008. The full report is found in Appendix G and is summarized below.

#### 3.1 Traffic - Existing Conditions

##### 3.1.1 Roadway and Intersection Descriptions

The subject property is located at the southwest corner of the Long Island Expressway (LIE) South Service Road/Old Walt Whitman Road intersection in Melville, which is part of the Town of Huntington. The property has approximately 2,500 feet of frontage along eastbound LIE South Service Road and approximately 1,200 feet of frontage along southbound Old Walt Whitman Road. A description of area uses and the surrounding roadway network are found in the Traffic Report (Appendix G). The following roadways were evaluated in the Traffic Report:

- The LIE, also known as Interstate 495
- The LIE South Service Road
- The LIE North Service Road
- Old Walt Whitman Road
- NYS Route 110
- Round Swamp Road
- Old Country Road
- Sweet Hollow Road
- Pinelawn Road
- Pineridge Street
- Northgate Circle
- Baylis Road
- Duryea Road
- Cottontail Road
- Park Drive

A description of area intersections is found in the Traffic Report (Appendix G). The following intersections were evaluated in the Traffic Report:

- Old Walt Whitman Road and LIE South Service Road
- Old Walt Whitman Road and LIE North Service Road
- Old Walt Whitman Road and Sweet Hollow Road/Pinelawn Road (C.R. 3)
- Old Walt Whitman Road and Pineridge Street
- Old Walt Whitman Road and Northgate Circle/Baylis Road
- NYS Route 110 and Old Walt Whitman Road/Duryea Road
- NYS Route 110 and LIE South Service Road
- NYS Route 110 and LIE North Service Road
- NYS Route 110 and Old Country Road
- Old Walt Whitman Road and Old Country Road
- Round Swamp Road and LIE South Service Road
- Round Swamp Road and LIE North Service Road
- Old Walt Whitman Road and Cottontail Road
- Old Walt Whitman Road and Park Drive

### 3.1.2 Traffic Counts

Manual turning movement counts were collected during the typical weekday morning and evening time periods to evaluate the existing traffic conditions and identify the specific hours when traffic activity on the adjacent roadways is at a maximum and could be potentially impacted by the proposed development. The counts were collected on Thursday, January 31, 2008 from 7:00 a.m. to 9:00 a.m. and from 4:00 p.m. to 6:00 p.m. The time periods were identified based on the traffic engineering standards provided by the Institute of Transportation Engineers (ITE) and traffic characteristics associated with office developments. The following intersections were surveyed:

- Old Walt Whitman Road and Old Country Road
- Old Walt Whitman Road and Sweet Hollow Road/Pinelawn Road (C.R. 3)
- Old Walt Whitman Road and Cottontail Road
- Old Walt Whitman Road and the LIE North Service Road
- Old Walt Whitman Road and the LIE South Service Road
- Old Walt Whitman Road and the existing FedEx Driveways
- Old Walt Whitman Road and Pineridge Street
- Old Walt Whitman Road and Northgate Circle/Baylis Road
- NYS Route 110 and Old Walt Whitman Road/Duryea Road
- NYS Route 110 and Old Country Road
- NYS Route 110 and LIE North Service Road
- NYS Route 110 and LIE South Service Road
- Round Swamp Road and LIE South Service Road

Spot counts were conducted on the LIE Exit 49S off-ramp to confirm traffic conditions during the peak times. The spot counts were collected on Thursday, June 26, from 8:00 a.m. to 9:00 a.m. and from 5:00 p.m. to 6:00 p.m.

To address NYSDOT comments, counts were also conducted at the intersection of LIE North Service Road and Round Swamp Road to collect turning movement data and to confirm traffic conditions during the peak times. The counts were collected on Tuesday, October 28, from 5:00 p.m. to 6:00 p.m. and on Wednesday, October 29, from 8:00 a.m. to 9:00 a.m. and incorporated into the overall traffic volume network. Please note that these were utilized for the purpose of evaluating the signal coordination between the LIE north and South Service Roads in the “Build with Mitigation” condition only.

In addition, traffic count data was obtained from the Town of Huntington for the intersection of Old Walt Whitman Road and Park Drive.

The results of the traffic count program indicate that there is a distinct hour during the weekday mornings and weekday evenings when traffic experiences its highest levels. The weekday morning peak hour was found to occur from 8:00 am to 9:00 am; the weekday evening peak hour was found to occur from 5:00 pm to 6:00 pm.

Please note, in order to provide a conservative analysis, a 6.5% seasonal adjustment factor was applied to the existing “as-counted” traffic volumes as January is typically a below average month for traffic activity. The intersections were then balanced with each other by carrying the larger though volumes between each intersection.

### 3.1.3 Level of Service and Capacity Analysis

Level of Service/Volume-Capacity analyses were conducted for the study intersections using Synchro 6 Software and Highway Capacity Software Plus (HCS+).<sup>1</sup>

Table 3-1 provides the existing Levels of Service experienced at each of the signalized intersections that were analyzed utilizing HCS+ software. The signalized intersections are listed along with their overall Level of Service.

**Table 3-1 - Existing Conditions Analysis Utilizing HCS+ Software (HCM Methodology)**

Intersection	Existing LOS	
	AM	PM
NYS Route 110 and Old Walt Whitman/Duryea Road	D	E
NYS Route 110 and Old Country Road	E	F

Table 3-2 provides the existing Levels of Service experienced at each of the signalized intersections that were analyzed utilizing Synchro methodology. The signalized intersections are listed along with their overall Level of Service.

**Table 3-2 - Existing Conditions Analysis Utilizing Synchro Software (Synchro Methodology)**

Intersection	Existing LOS	
	AM	PM
Old Walt Whitman Road and Sweet Hollow Road/Pinelawn Road (C.R. 3)	B	B
Old Walt Whitman Road and LIE North Service Road	C	E
Old Walt Whitman Road and LIE South Service Road	D	C
Old Walt Whitman Road and Pineridge Street	A	A
Old Walt Whitman Road and Northgate Circle/Baylis Road	F	C
NYS Route 110 and LIE North Service Road	C	C
NYS Route 110 and LIE South Service Road	D	E
Round Swamp Road and LIE South Service Road	C	C

<sup>1</sup> See Technical Appendix of the Traffic Study for Level of Service/ Volume-Capacity descriptions

Table 3-3 provides the existing Level of Service of the critical intersection approach at the unsignalized intersections analyzed utilizing HCS+ software. Note that HCS+ does not provide an overall Level of Service for unsignalized intersections.

**Table 3-3 - Existing Conditions Analysis for Unsignalized Intersections(HCM Methodology)**

Intersection	Existing LOS	
	AM	PM
Old Walt Whitman Road and Old Country Road	F	F

Table 3-4 provides the existing Level of Service of the critical intersection approach for each of the unsignalized study intersections that were analyzed utilizing Synchro software, as requested by the Town of Huntington. The unsignalized intersections were analyzed in Synchro using HCM methodology. Please note, HCM does not provide an overall Level of Service for unsignalized intersections.

**Table 3-4 - Existing Conditions Analysis for Unsignalized Intersections (Synchro Methodology)**

Intersection	Existing LOS	
	AM	PM
Old Walt Whitman Road and Cottontail Road	D	C
Old Walt Whitman Road and Existing FedEx Driveway North	D	D
Old Walt Whitman Road and Existing FedEx Driveway South	D	F
Old Walt Whitman Road and Park Drive	C	D

The Traffic Study identifies several operational constraints that are fully described in that document. The individual approach delays and associated Levels of Service are shown in the Technical Appendix in the full report (Appendix G).

### 3.2 Traffic – Future Conditions without the Proposed Project

#### 3.2.1 Future Base Conditions

Traffic volumes are projected two (2) years into the future utilizing local information on background traffic growth and research on projects that may influence traffic in the surrounding area prior to the opening of the proposed office development. This step in the analysis is known as the no-build condition.

It is anticipated that the proposed development will be completed within two years. An ambient growth rate was obtained from the NYSDOT, specifically for the Town of Huntington, and was applied directly to the existing traffic volumes to generate the 2010 future “base” traffic volumes, which take into account potential traffic growth peripheral to the subject site. The 2010 future “base” traffic volumes are

depicted on Figures 6 and 7 of the full report (see Appendix G) for the weekday morning and evening peak hours.

### 3.2.2 Future Roadway Improvements

The Melville area would likely experience significant changes to its transportation roadway network over the next 2 to 4 years, based on research and continued due diligence with the NYSDOT and the Town of Huntington, two roadway improvement projects are planned for the NYS Route 110 and Old Walt Whitman Road corridors. These projects are identified herein because they would introduce significant changes to the surrounding transportation network in an overall attempt to improve mobility throughout the Melville area. Both projects are expected to have positive effects on the Canon development project, and would comprise, in part, the off-site mitigation package identified in this report.

#### Roadway Improvements for Old Walt Whitman Road from NYS Route 110 to Old Country Road, NYSDOT PIN 0758.58

The Town of Huntington, with financial assistance from the NYSDOT, would be initiating this project to upgrade Old Walt Whitman Road. Construction is scheduled to begin in 2009, based on information provided by the Town engineering staff. In general, the project would improve the road surface and pavement markings, replace and add traffic signal infrastructure, improve pedestrian facilities (sidewalks and ramps), and, at some intersections, improve vehicular capacity through the installation of turn bays and channelized right-turn lanes. New pavement markings would delineate a center two-way left-turn lane and new shoulder lines within the general limits of the existing pavement width.

The approved design plans were obtained from the Town and the key elements of the project incorporated into the future capacity analysis herein. Any frontage improvements identified in this assessment would be directly coordinated with the Town's project.

#### Northern State Parkway and LIE Interchange Improvements Project at NYS Route 110, NYSDOT PIN 0516.41

The NYSDOT has proposed a series of roadway improvements that would upgrade the NYS Route 110 corridor and its junctions with Old Country Road, the Northern State Parkway and the LIE. Based on information obtained from the NYSDOT's

project management staff, the improvement project would be phased in two parts: Phase 1, which extends northerly from the LIE to Nikon Driveway, is scheduled for construction in 2010-2011; Phase 2, which extends northerly from Nikon Driveway to Arrowwood Lane (incorporating the Northern State Parkway interchange), is scheduled for construction in 2010-2012. In general, the DOT roadway improvement project would add one northbound and one southbound travel lane on NYS Route 110, beginning at Arrowwood Lane and meeting the existing 6-lane section just south of the LIE. Consequently, other major improvements are proposed, including a full bridge replacement at the Northern State Parkway, reconfiguration and signalization of the Old Walt Whitman Road-Old Country Road intersection, and miscellaneous capacity upgrades to the LIE Service Roads and other key intersections within the project limits.

The approved design plans and design report were obtained from the NYSDOT and the key elements of the project incorporated into the future capacity analysis. Any off-site improvements identified would be coordinated with the NYSDOT's project during the permit review process.

For additional information pertaining to how the DOT projects relate to the future traffic conditions and Canon's proposed mitigation package, please refer to the Recommended Mitigation Measures (Section 3.4) and the Traffic Report (Appendix G).

### *3.2.3 Other Planned Development*

Based on research with the New York State Department of Transportation and the Town of Huntington, a 103,000-square-foot Rubie's Costume Company office complex, consisting of 91,800 square feet of office space, an 8,000-square-foot restaurant, and a 3,200-square-foot bank, is proposed to be constructed at the southwest corner of the NYS Route 110-LIE South Service Road intersection. Traffic volumes associated with the Rubie's Costume Company office building were obtained from the Traffic Impact Study last revised November 2006 prepared by RMS Engineering. The traffic volumes attributed to this other planned development are illustrated in Figures 8 and 9 of the Technical Appendix of the Traffic Report (Appendix G).

### 3.2.4 Future No-Build Traffic Volumes

The volumes from the other area development were added to the 2010 future “base” traffic volumes to develop the 2010 future “No-Build” traffic volumes. Figures 10 and 11 of the Technical Appendix (Appendix G) depict the 2010 future “No-Build” traffic volumes for the study peak hours.

## 3.3 Traffic – Future Conditions with the Proposed Project

### 3.3.1 ITE Trip Generation

The volume of trips generated by the proposed development was determined by using standard calculations compiled by the Institute of Transportation Engineers (ITE) in its 7th edition of Trip Generation, 2003. The trip generation was calculated as Land Use 710, “General Office Building,” for the proposed 900,000-square-foot development. The Trip Generation for the proposed development is summarized in the table below:

**Table 3-5 - Trip Generation for the Proposed Project**

	<b>Weekday Morning Peak Hour</b>	<b>Weekday Evening Peak Hour</b>
Entering	1,224	225
Exiting	171	1,116
<b>Total</b>	<b>1,395</b>	<b>1,341</b>

### 3.3.2 Trip Distribution

The site-generated traffic attributed to the proposed office development has been assigned to the roadway network based on current employee zip code data derived from the Lake Success Canon office complex and a reasonable assumption of modification to that traffic assignment as a result of the future relocation to Melville. Analysis of the data indicates that of the Long Island employee base, 75% reside in Nassau County and 25% reside in Suffolk County. Based on the population density of Nassau County, it is expected that the majority of traffic associated with the proposed office complex in Melville would still be drawn from Nassau County. However, with the relocation to Melville, it is anticipated that the Nassau County employee base would reduce by 25% in the future to account for employee relocations and new hires, therefore reflecting a more balanced distribution of traffic.

The resulting traffic distribution and assignment of the future site-generated traffic to the adjacent roadway network utilized for this study is shown in Figures 14 through 21 the Technical Appendix of the Traffic Report (Appendix G) for the weekday

morning and weekday evening peak hours. Note, at the proposed LIE South Service Road site driveway, vehicles would only be able to enter the site during the morning peak period and exit during the evening peak period. Please note that no additional consideration was given for mass transportation or ride-share specific to this office development. To lessen the impact of Canon's trip generation on the peak hour of the adjacent roadway network, Canon has committed to implementing the following staggered arrival-departure hours program:

- 8:00 a.m. – 4:00 p.m.
- 8:30 a.m. – 4:30 p.m.
- 9:00 a.m. – 5:00 p.m.
- 9:30 a.m. – 5:30 p.m.

As a result, it would be expected that the trip generation of the proposed office building would be spread throughout the morning and evening periods and therefore the analysis contained herein which superimposes all of the site generated traffic onto the single busiest hour during the morning and evening peak periods would represent a “worst-case” scenario.

### 3.3.3 Future “Build” Traffic Volumes

The 2010 future “Build” traffic volumes were established by surcharging the site-generated traffic volumes onto the 2010 future “No-Build” traffic volumes. The resulting 2010 future “Build” traffic volumes are shown on Figures 22 and 23 of the Traffic Study (Appendix G).

### 3.3.4 Future “Build” Traffic Analysis

Level of Service/Volume-Capacity analyses were conducted under the future no-build and build conditions. Note that the following “No-Build” and “Build” analyses only incorporate the Town of Huntington's proposed roadway improvements along Old Walt Whitman Road.

The following Table 3-6 provides the future “No-Build” and “Build” Levels of Service at each of the signalized intersections that were analyzed utilizing HCS+ software. The signalized intersections are listed along with their overall Level of Service.

**Table 3-6 - No-Build and Build Analysis for Signalized Intersections (HCM Methodology)**

Intersection	No Build/Build LOS	
	AM	PM
NYS Route 110 and Old Walt Whitman/Duryea Road	D/E	E/E
NYS Route 110 and Old Country Road	E/E	F/F

Table 3-7 provides the future “No-Build” and “Build” Levels of Service of each of the signalized intersections that were analyzed utilizing Synchro methodology in Synchro software. The signalized intersections are listed along with their overall Level of Service.

**Table 3-7 - No-Build and Build Analysis for Signalized Intersections (Synchro Methodology)**

Intersection	No Build/Build LOS	
	AM	PM
Old Walt Whitman Road and Sweet Hollow Road/Pinelawn Road (C.R. 3)	B/B	A/B
Old Walt Whitman Road and LIE North Service Road	C/D	E/F
Old Walt Whitman Road and LIE South Service Road	C/D	C/E
Old Walt Whitman Road and Pineridge Street	A/A	A/B
Old Walt Whitman Road and Northgate Circle/Baylis Road	B/D	A/B
NYS Route 110 and LIE North Service Road	D/E	C/D
NYS Route 110 and LIE South Service Road	C/C	F/F
Round Swamp Road and LIE South Service Road	C/D	C/C
Old Walt Whitman Road and Park Drive	A/A	A/A
Proposed Canon Main Site Driveway/Existing FedEx Driveway South & Old Walt Whitman Road	-/B	-/F

Table 3-8 provides the “No-Build” and “Build” Level of Service at the unsignalized intersections that were analyzed utilizing HCS+ software.

**Table 3-8 - No-Build and Build Analysis for Unsignalized Intersections (HCM Methodology)**

Intersection	No-Build/Build LOS	
	AM	PM
Old Walt Whitman Road and Old Country Road	F/F	F/F
Proposed Site Driveway & LIE South Service Road	-/-	-/D

Table 3-9 provides the “No-Build” and “Build” Levels of Service of the critical intersection approach for each of the unsignalized study intersections included in this study that were analyzed utilizing Synchro software. At the request of the Township, these intersections were analyzed in Synchro using HCM methodology.

**Table 3-9 - No Build and Build Analysis for Unsignalized Intersections (Synchro Methodology)**

Intersection	No Build/Build LOS	
	AM	PM
Old Walt Whitman Road and Cottontail Road	D/F	C/C
Old Walt Whitman Road and Existing FedEx Driveway North	D/B	D/B
Old Walt Whitman Road and Existing FedEx Driveway South	E/-	F/-
Proposed Canon South Driveway & Old Walt Whitman Road	-/F	-/F

The Traffic Report identified persisting capacity constraints or changes in Level of Service at many of these intersections. The individual approach delays and associated Levels of Service are shown in the Technical Appendix (see Traffic Report Appendix G).

### *3.4 Traffic - Recommended Mitigation*

To address existing roadway network constraints as well as the anticipated impact associated with the proposed Canon Americas Headquarters, a series of mitigation measures within the surrounding roadway network have been identified. The mitigation package maintains the calculated base “No-Build” traffic condition at the intersections under review by introducing capacity upgrades, and, in some areas, incorporating the NYSDOT and Town of Huntington’s improvement projects as discussed earlier. These agencies have proposed improvements that are extensive in scope and aim to globally address area-wide transportation infrastructure and welfare. It is recommended that the mitigation measures proposed herein, all of which are beyond the required scope of mitigation measures required by the NYSDOT’s Route 110 project and the Town of Huntington’s Old Walt Whitman Road project, be completed in conjunction with these area-wide improvements in an effort to minimize construction phasing and scheduling efforts.

The following mitigation package includes improvements to the area-wide transportation network that would enhance the roadway network for existing motorists and also would be required to address Canon’s traffic impact on the noted intersections. These modifications are generally regionalized improvements. As such, the funding and implementation mechanisms for these improvements are expected to be derived from public entities as the measures would benefit the traveling public, in addition to just Canon’s employees and visitors.

However, specific design changes are recommended to the Town’s Old Walt Whitman Road improvement plan to allow for efficient ingress to and egress from the site itself. The program has been dependent upon funds from Town and State sources and contributions from private developments impacting the existing roadways. Therefore, Canon will pay a Development Impact Fee in the amount of \$1.3 Million dollars deposited in the Town's Trust and Agency Account established for traffic improvements associated with the Walt Whitman Road area. Surplus funds remaining after the completion of these improvements will be used by the Town for economic development programming and transportation infrastructure in the Melville area.

Various funding alternatives are currently being explored for the required improvements including those on the Long Island Expressway North and South Service Roads that as of yet, have not been fully funded. The Town, in cooperation with the Applicant is seeking grant funding from the Federal government, New York State and Suffolk County to fund these improvements. Prior to the Planning Board granting final site plan approval of the Canon project, the Applicant, the Town and the New York State Department of Transportation shall agree to an Infrastructure Implementation Plan that will detail the source of funding and the timing for the construction of the infrastructure improvements.

The recommended improvements are described in detail below and comprise the “Build with Mitigation” scenario.

The Traffic Study ( Appendix G) includes Conceptual Roadway Improvement Plans which depict the frontage improvements associated with the Canon project and their connection to the adjacent corridor improvements proposed by the Town of Huntington and the NYSDOT. Additionally, a table containing the various proposed mitigation measures and associated timeframes is provided in Section 3.4.6 to summarize the planned improvement programs.

#### *3.4.1 Signalized Intersections Analyzed with HCS+ Software*

##### NYS Route 110 and Old Walt Whitman Road/Duryea Road

Signal timing modifications are recommended during the weekday morning peak hour. Although the overall intersection delay would degrade to a Level of Service “E” with the implementation of the timing modifications, each “Build” condition Level of Service movement would be consistent with each “No-Build” condition Level of Service movement during the weekday morning peak hour. Signal timing modifications are not recommended during the weekday evening peak hour “build” condition. Although the northbound NYS Route 110 left-turn movement would degrade to a Level of Service “F” with the addition of the Canon site traffic, only a 0.50 second change in overall intersection delay is calculated between the “No-Build” the “Build” weekday evening peak hour scenarios, which is not deemed to be a significant degradation. Note that NYSDOT’s proposed roadway improvements do not include this intersection.

### NYS Route 110 and Old Country Road

The NYSDOT's planned improvements to the NYS Route 110-Old Country Road intersection were incorporated into the "Build with Mitigation" analysis. The modifications include the addition of one (1) exclusive through lane along the northbound and southbound NYS Route 110 approaches. In addition, the NYSDOT project also proposes the extension of Old Walt Whitman Road, which is located immediately west of this intersection. This extension would connect Old Walt Whitman Road to southbound NYS Route 110, and was also incorporated into this analysis. It should be noted that all of the traffic currently making a right-turn movement from southbound NYS Route 110 to westbound Old Country Road would execute this turn at the Old Walt Whitman Road extension. Therefore, the traffic volumes have been modified accordingly in the "No-Build" with Town and NYSDOT improvements and the "Build with Mitigation" analyses. It is expected that the proposed roadway modifications, as well as signal timing changes would improve the "Build" condition such that the intersection would perform with similar or less overall delay than in the "No-Build" condition. The Old Country Road westbound left-turn/through/right-turn movement would degrade to a Level of Service "F" under the weekday morning peak hour "Build" condition. However, the overall delay increases by only 0.50 seconds and 1.0 seconds during the weekday morning and evening peak hours, respectively, when compared to the "No-Build" with Town and NYSDOT improvements condition. Further, the overall intersection would continue to operate at the "No-Build" Level of Service during both peak hours.

The following table presents a comparison of the overall Levels of Service at the signalized intersections under the "No-Build" with Town and NYSDOT roadway improvements and "Build with Mitigation" scenarios utilizing HCS+ software.

**Table 3-10 - Signalized Intersections - No-Build with Improvements & Build with Mitigation (HCM Methodology)**

Intersection	No-Build With Town & NYSDOT / Build with Mitigation	
	AM	PM
NYS Route 110 and Old Walt Whitman/Duryea Road	D/E	E/E
NYS Route 110 and Old Country Road	E/E	F/F

### 3.4.2 Signalized Intersections Analyzed with Synchro Software

The following sub-section presents the “No-Build” with Town and NYSDOT improvements and the “Build with Mitigation” scenarios for the intersections analyzed using Synchro Software.

#### Old Walt Whitman Road and Sweet Hollow Road/Pinelawn Road (C.R. 3)

Signal timing modifications are proposed at the Old Walt Whitman Road-Sweet Hollow Road/Pinelawn Road intersection. As a result of the signal timing improvements, each approach to the intersection is expected to operate at “No-Build” with Town and NYSDOT improvements Levels of Service during both peak hours. Please note, during the evening peak hour, the overall intersection degrades to a Level of Service “B” due to a slight increase in delay of 0.2 seconds.

#### Old Walt Whitman Road and LIE North Service Road

Similar to the LIE South Service Road, the NYSDOT’s improvement project proposes an additional through lane at the westbound approach to the NYS Route 110-LIE North Service Road intersection. The full build-out of the proposed development would require widening along the LIE North Service Road. The recommended roadway improvements are depicted on the Conceptual Roadway Improvement Plans, Sheets 5 and 6 of 7, as well as the appended LIE North Service Road Detail (Sheet 1 of 2) provided in Appendix G. The widening would meet the westerly extent of NYSDOT’s proposed improvements at the Route 110-LIE North Service Road intersection. The “Build with Mitigation” analysis includes an additional westbound through lane on the LIE North Service Road to complement the NYSDOT’s improvement project and address capacity constraints at the intersection. It is recommended that the northbound Old Walt Whitman Road approach at LIE North Service Road be reconfigured to provide two (2) exclusive left-turn lanes and one (1) exclusive through lane. The recommended mitigation, along with signal timing modifications and the new westbound through lane proposed under the NYSDOT project, would allow the overall intersection to operate at the “No-Build” with Town and NYSDOT improvements Level of Service “C” during the weekday morning peak hour. It should be noted that the northbound approach would improve to a Level of Service “B” and that there is a slight decrease in overall intersection delay of 0.8 seconds when analyzed under the “Build with Mitigation” scenario. During the evening peak hour, the overall intersection is expected to improve from a “No-Build” with Town and NYSDOT improvements

Level of Service “E” to a “Build with Mitigation” Level of Service “D” with a decrease in overall intersection delay of 21.1 seconds. It should be noted that the westbound approach would improve to a Level of Service “D” and the southbound approach would improve to a Level of Service “E”.

#### Old Walt Whitman Road and LIE South Service Road

The NYSDOT’s improvement project proposes an additional through lane at the eastbound approach to the NYS Route 110-LIE South Service Road intersection. This action would require widening along the LIE South Service Road, which has been conceptually designed by ADTE as depicted on the Conceptual Roadway Improvement Plans, Sheets 3 and 7 of 7 provided in Appendix G. The widening would meet the westerly extent of NYSDOT’s proposed improvements at the Route 110-LIE South Service Road intersection. The “Build with Mitigation” analysis includes an additional eastbound through lane on the LIE South Service Road to complement the NYSDOT’s improvement project and address capacity constraints at the intersection. In addition, it is recommended that the southbound Old Walt Whitman Road approach be reconfigured to provide one (1) exclusive left-turn lane and two (2) exclusive through lanes. This recommended mitigation, along with signal timing modifications, would improve the overall intersection from a Level of Service “C” in the “No-Build” with Town and NYSDOT improvements condition to Level of Service “B” in the “Build with Mitigation” condition during the morning peak hour with a decrease in overall intersection delay of 16.2 seconds. It should be noted that the eastbound approach would improve from a “No-Build” with Town and NYSDOT improvements Level of Service “D” to a “Build with Mitigation” Level of Service “B” and the northbound approach would improve from a Level of Service “D” to a Level of Service “C.” During the evening peak hour, the overall intersection would operate at the “No-Build” with Town and NYSDOT improvements Level of Service “C” with a slight decrease in delay of 1.0 seconds. It should be noted that the eastbound left-turn/through movement improves from a “No-Build” with Town and NYSDOT improvements Level of Service “D” to a “Build with Mitigation” Level of Service “C.”

#### Old Walt Whitman Road and Pineridge Street

During the morning peak hour, the eastbound approach would degrade slightly to a Level of Service “C” with the implementation of signal timing modifications. Although a degradation would be anticipated, the overall intersection would continue

to operate at the “No-Build” with Town and NYSDOT improvements Level of Service “A” with a slight increase in delay of only 1.7 seconds. During the evening peak hour, the overall intersection is expected to degrade to a Level of Service “B”. Please note that although a degradation would occur, a Level of Service “B” is still highly acceptable per traffic engineering design standards.

#### Old Walt Whitman Road and Northgate Circle/Baylis Road

Signal timing modifications are recommended at the Old Walt Whitman Road intersection with Northgate Circle/Baylis Road. The eastbound and westbound approaches to the intersection would degrade to a Level of Service “D” and a Level of Service “C”, respectively, while the southbound approach would improve to a Level of Service “A” during the weekday morning peak hour. Although a degradation along certain approaches would be anticipated, the overall intersection would improve to operate at an overall Level of Service “A” with a slight decrease in delay of 1.8 seconds. During the evening peak hour, the eastbound and westbound approaches to the intersection would degrade to a Level of Service “C” and a Level of Service “B”, respectively, while the southbound approach would improve to a Level of Service “A”. However, it should also be noted that the overall intersection would improve to operate at an overall Level of Service “A” with a slight decrease in overall intersection delay of 5.4 seconds

#### NYS Route 110 and LIE North Service Road

The NYSDOT’s project, which involves an additional LIE North Service Road through lane, was also incorporated in the “Build with Mitigation” analysis at this intersection. An additional through lane along the LIE North Service Road would alleviate capacity constraints on the westbound approach of this intersection. During the weekday morning peak hour, with the proposed signal timing modifications, the overall intersection would improve from the “No-Build” with Town and NYSDOT improvements Level of Service “C” to a “Build with Mitigation” Level of Service “B” due to a decrease in delay of 2.4 seconds. It should be noted that the northbound approach is expected to improve to a Level of Service “A”. During the weekday evening peak hour, the overall intersection would operate at the “No-Build” with Town and NYSDOT improvements Level of Service “B” with a slight decrease in delay of 1.6 seconds. Please note, each approach is expected to continue to operate at “No-Build” with Towns and NYSDOT improvements Levels of Service.

### NYS Route 110 and LIE South Service Road

The roadway improvements associated with the NYSDOT's project have been incorporated in the "Build with Mitigation" analysis at this intersection. The NYSDOT project involves the addition of one (1) through lane along the LIE South Service Road. With the additional through lane along with signal timing modifications, the overall intersection is calculated to operate at an acceptable Level of Service "C" during the morning peak hour. Please note that the eastbound approach is calculated to operate at a Level of Service "D" while the southbound approach is calculated to improve to a Level of Service "A." During the weekday evening peak hour, the overall intersection is calculated to operate at a Level of Service "D" due to an increase in delay of 18.9 seconds. The northbound approach to the intersection is calculated to operate at a Level of Service "D", the eastbound approach to the intersection is calculated to operate at a Level of Service "E", and the southbound approach to the intersection is calculated to operate at a Level of Service "C".

### Round Swamp Road and LIE South Service Road

Signal timing modifications are proposed at the Round Swamp Road and LIE South Service Road intersection. As it is understood that the subject intersection is coordinated with the adjacent intersection of Round Swamp Road and LIE North Service Road, the Round Swamp Road/LIE North Service Road intersection was included in the "Build with Mitigation" Synchro analyses. Integration of the intersection into the network model was done to determine the affects of the proposed signal timing modifications at Round Swamp Road/LIE South Service Road on the roadway network, particularly the segment of Round Swamp Road located between the two subject intersections as the segment has limited storage capacity. With the proposed signal timing modifications, it was determined that adequate capacity would be available along both directions of the roadway segment and that a gridlocked condition would not occur during either peak period studied. In addition, it was determined that the overall intersection is expected to degrade from a "No-Build" with Town and NYSDOT improvements Level of Service "C" to a Level of Service "D" during the weekday morning peak hour. Please note that although a degradation would occur, a Level of Service "D" is an acceptable Level of Service per traffic engineering design standards. During the weekday evening peak hour, the overall intersection is expected to operate at a "No-Build" with Town and NYSDOT improvements Level of Service "C". In addition, each approach to

the intersection is expected to operate at “No-Build” with Town and NYSDOT improvements Levels of Service or better. Please note, the eastbound approach to the intersection is expected to improve to a Level of Service “C”.

#### Round Swamp Road and LIE North Service Road

As the intersection of Round Swamp Road and LIE North Service Road is coordinated with the intersection of Round Swamp Road and LIE South Service Road, signal timing modifications are also proposed at the Round Swamp Road/LIE North Service Road intersection. The signal timings were modified in relation to the proposed signal timing changes at the Round Swamp Road/LIE South Service Road intersection in order to provide more efficient vehicular progression along the Round Swamp Road corridor. With the proposed signal timing changes, each approach to the intersection is calculated to operate at a Level of Service “D” or better during both peak periods.

#### Park Drive and Old Walt Whitman Road

Signal timing modifications are proposed at the intersection of Park Drive and Old Walt Whitman Road. With the signal timing changes, each approach to the intersection is expected to operate at “No-Build” with Town and NYSDOT improvements Levels of Service during both the weekday morning and weekday evening peak hours with one exception. During the weekday evening peak hour, the eastbound approach is expected to degrade to a Level of Service “C”. However, it should be noted that the overall intersection is expected to continue to operate at the “No-Build” with Town and NYSDOT improvements Level of Service “A”.

#### Canon Main Driveway and Old Walt Whitman Road

A signalized access point would be constructed as part of the development proposal at the Old Walt Whitman Road intersection formed by the existing southerly FedEx driveway and Canon’s proposed main driveway. The “Build with Mitigation” condition incorporates one (1) additional southbound through lane and one (1) additional southbound right-turn bay on Old Walt Whitman Road. The additional southbound through lane would extend along the site’s Old Walt Whitman Road frontage and taper just north of the southerly Canon site driveway. To the north, the additional pavement width would meet the expanded southbound approach at the Old Walt Whitman-LIE South Service Road intersection, discussed further in the mitigation section on Page 32 in the full report. Under “Build with Mitigation”

conditions, this intersection will operate at an overall Level of Service “B” during the morning peak hour and an overall Level of Service “D” during the evening peak hour.

The following lists respectively provide the future “No-Build” with Town and NYSDOT improvements and the “Build with Mitigation” Levels of Service at each of the signalized intersections analyzed in Synchro. The signalized intersections are listed along with their overall Level of Service.

**Table 3-11 - Signalized Intersections - No-Build with Improvements & Build with Mitigation (Synchro Methodology)**

Intersection	No-Build with Town & NYSDOT / Build with Mitigation	
	AM	PM
Old Walt Whitman Road and Sweet Hollow Road/Pinelawn Road (C.R. 3)	B/B	A/B
Old Walt Whitman Road and LIE North Service Road	C/C	E/D
Old Walt Whitman Road and LIE South Service Road	C/B	C/C
Old Walt Whitman Road and Pineridge Street	A/A	A/B
Old Walt Whitman Road and Northgate Circle/Baylis Road	B/A	B/A
NYS Route 110 and LIE North Service Road	C/B	B/B
NYS Route 110 and LIE South Service Road	B/C	C/D
Round Swamp Road and LIE South Service Road	C/D	C/C
Round Swamp Road and LIE North Service Road	-/D	-/C
Old Walt Whitman Road and Park Drive	A/A	A/A
Proposed Canon Main Site Driveway/Existing FedEx Driveway South & Old Walt Whitman Road	-/B	-/D

### 3.4.3 Old Walt Whitman Road – Coordinated Traffic Signal Network

The existing traffic signals on Old Walt Whitman Road at Pineridge Street and Northgate Circle/Baylis Road would be replaced as part of the planned corridor improvement project. Together with the proposed traffic signal to be installed at Park Drive under the same improvement project, the Town may consider implementing a coordinated traffic signal network to improve throughput and vehicle progression within the corridor. The addition of a new traffic signal at Canon’s main access point would result in four (4) signalized intersections on Old Walt Whitman Road between the LIE South Service Road and NYS Route 110. In an effort to provide the Town with a recommendation for an optimized network to serve the traveling public as well as the future Canon office complex, Atlantic Traffic developed a preliminary Coordinated Traffic Signal Network Plan under the Build with Mitigation scenario utilizing the Synchro Signal Coordination Methodology. Coordination means that there is a predictable time relationship between the operation of each signal relative

to the operations of each of the other signals located within the specific system or zone. The above-mentioned intersections were segregated from the remainder of the Synchro network and optimized during the weekday morning and evening peak hours. Please note that while the existing traffic signals at the LIE North and South Service Roads are in close proximity to the four under consideration here, they are part of NYSDOT's INFORM system and would not be fully integrated into a Town-maintained network. However, at the request of the NYSDOT, the proposed signalized intersection formed by Canon's Main Site Driveway and Old Walt Whitman Road would be interconnected to the signalized intersection of LIE South Service Road and Old Walt Whitman Road. The phasing of the proposed traffic signal at the driveway would be linked to the existing traffic signal at the LIE South Service Road in an effort to alleviate queuing and delay along northbound Old Walt Whitman Road. As such, the Synchro network under the "Build with Mitigation" scenario was analyzed such that the intersection of the Canon Main Site Driveway and Old Walt Whitman Road, along with the adjacent intersections of Pineridge Street and Baylis Road/Northgate Circle and Park Drive, would all have identical cycle lengths to that of the LIE South Service Road and Old Walt Whitman Road intersection during each peak hour. Specifically, these aforementioned intersections would have cycle lengths of 100 seconds during the morning peak hour and 90 seconds during the evening peak hour. Offsets in relation to the LIE South Service Road and Old Walt Whitman Road intersection were then calculated at each of the traffic signals south of Canon during both peak hours in order to link the two networks and develop a coordinated network along Old Walt Whitman Road that would minimize northbound queuing and delay.

The table below summarizes the recommended cycle length and offset parameters for each traffic signal on Old Walt Whitman Road between the LIE South Service Road and NYS Route 110. Please note that the design of this network should be adjusted based on further consultations with the Town of Huntington and its traffic consultant as the Reference Phase/Offset Settings may require adjustment based on the Town's implementation plan and the types of controller units typically utilized by the Town of Huntington. The following parameters, as well as all other traffic signal timing parameters, are provided in the appended Synchro output sheets in Appendix G.

**Table 3-12 - Cycle Length and Offset Parameters**

Intersection	Cycle Length (sec.)	
	AM/PM	Offset (sec.) AM/PM
Canon/FedEx	100/90	76/11
Pineridge Street	100/90	94/75
Northgate Circle/Baylis Road	100/90	0/0
Park Drive*	50/90	3/0

\*Half and double cycle lengths can function in coordinated traffic signal networks

#### 3.4.4 Unsignalized Intersections Analyzed with HCS+ Software

##### Old Walt Whitman Road and Old Country Road

The proposed NYSDOT modifications at this intersection involve the installation of a traffic signal. The traffic signal would be installed to operate in coordination with the NYS Route 110 and Old Country Road signal. The installation of a traffic signal at this intersection would improve the delays at the northbound and southbound approaches to the intersection. Note that this mitigation analysis incorporates the anticipated re-routing of traffic volumes based on the NYSDOT Planned extension of Old Walt Whitman Road to meet NYS Route 110 just south of the Northern State Parkway. The intersection would continue to operate at the “No-Build” Levels of Service with the build out of the Canon Development when compared to the “No-Build” condition incorporating the Town and NYSDOT improvements with the exception of the Old Walt Whitman Road southbound left-turn/through movement which would degrade to a Level of Service “C” during the weekday morning peak hour. In addition, the proposed signal timing modifications in the Build with Mitigation scenarios would decrease the overall intersection delay by 2.2 seconds and 10.4 seconds during the weekday morning and weekday evening peak hours, respectively.

The following table presents the overall Levels of Service at the unsignalized intersection under the “No-Build” with Town and NYSDOT improvements and the “Build with Mitigation” scenarios utilizing HCS+ software.

**Table 3-13 - Unsignalized Intersections - No-Build with Improvements & Build with Mitigation (HCM Methodology)**

Intersection	No-Build with Town & DOT / Build with Mitigation	
	AM	AM
Old Walt Whitman Road and Old Country Road	D/D	F/F

### 3.4.5 Unsignalized Intersections Analyzed with Synchro Software

#### Old Walt Whitman Road and Cottontail Road

Under the “Build with Mitigation” scenario, the critical approach at the intersection of Old Walt Whitman Road and Cottontail Road would operate at a Level of Service “E” during the morning peak hour due to an increase in delay of 4.8 seconds. During the weekday evening peak hour the approach would continue to operate at “No-Build” Levels of Service with the build out of the Canon development when compared to the “No-Build” condition incorporating the Town and NYSDOT improvements.

#### Old Walt Whitman Road and Existing FedEx North Driveway

Under the current development proposal, the northerly FedEx driveway would be configured to operate as a right-turn egress-only driveway, which is expected to improve the Level of Service for the critical approach at this intersection. Specifically, the westbound approach to the intersection is calculated to improve to a Level of Service “B” during both peak periods.

#### Proposed Canon South Driveway and Old Walt Whitman Road

One of the proposed “Build with Mitigation” improvements includes one (1) additional southbound through lane on Old Walt Whitman Road. The additional southbound through lane would extend along the site’s Old Walt Whitman Road frontage but would taper just north of the southerly Canon site driveway. As such, the overall Level of Service at the proposed Canon South Driveway intersection is calculated to operate at a Level of Service “F” during both peak periods under the “Build with Mitigation” scenario. Please note that the Level of Service “F” translates to a 95<sup>th</sup> percentile queue length of two (2) vehicles during the weekday morning peak hour and eight (8) vehicles during the weekday evening peak hour, which can be entirely accommodated on-site without affecting on-site circulation. It can also be observed in the Synchro simulation that adequate gaps in traffic are provided along Walt Whitman Road to accommodate the vehicles queued at the Canon south driveway.

The following table presents the Level of Service of the critical intersection approach for each of the unsignalized intersections under the “No-Build” with Town and NYSDOT improvements and the “Build with Mitigation” scenarios analyzed using

Synchro software. Note, at the request of the Town of Huntington, these intersections were analyzed in Synchro using HCM methodology.

**Table 3-14 - Unsignalized Intersections - No-Build with Improvements & Build with Mitigation (Synchro)**

Intersection	No-Build with Town & DOT / Build with Mitigation	
	AM	AM
Old Walt Whitman Road and Cottontail Road	D/E	C/C
Old Walt Whitman Road and Existing FedEx Driveway North	D/B	D/B
Old Walt Whitman Road and Existing FedEx Driveway South	E/-	F/-
Proposed Canon South Driveway & Old Walt Whitman Road	-/F	-/F

### 3.4.6 Roadway Mitigation Summary

The following improvements will be funded by a Development Impact Fee in the amount of \$1.3 Million dollars to be paid by the Applicant and deposited in the Town's Trust and Agency Account established for traffic improvements associated with the Walt Whitman Road area. Surplus funds remaining after the completion of the following improvements will be used by the Town for economic development programming and transportation infrastructure in Melville..

	LOCATION	MITIGATION IMPROVEMENT
1	Canon Frontage Walt Whitman Rd.	Additional SB through lane along WWR; merges back to one prior to southerly egress driveway and not conflicting with the existing right turn lane at Paumonauk Hills Court. Sufficient dedication must be provided to allow for maintaining the exiting northbound shoulder and 1 NB lane, center median, two SB through lanes, necessary right turn lanes into Canon. Also included is any utility and/or drainage relocation or improvements, curb and sidewalk provisions and any requisite improvements within the established Town right-of-way.
2	Walt Whitman Rd @ Canon Main Driveway	Traffic Signal Installation
3	Walt Whitman Rd. & Old Country Rd.	Traffic Signal Modifications
4	Walt Whitman Rd. & Pinelawn Rd./Sweet Hollow Rd.	Traffic Signal Modifications
5	Walt Whitman Rd. Bridge	Pavement marking upgrades and approach capacity upgrades along north and south approaches to the bridge.
6	Walt Whitman Rd. & Pineridge Street	Traffic Signal Modifications
7	Walt Whitman Rd. & Northgate Cir./Baylis Rd.	Traffic Signal Modifications
8	Walt Whitman Rd.& Park Drive	Traffic Signal Modifications
9	Walt Whitman Road –general	All signals from the LIE South Service Rd. to Park Drive must be interconnected. The Town of Huntington Traffic Engineer will determine the interconnection method based on a field inspection and consultations with the applicant's engineer.

The following improvements will benefit the regional transportation system and are required in order to mitigate the traffic impacts related to the Canon project. The

Town, in cooperation with the Applicant is seeking grant funding from the Federal government, New York State and Suffolk County to fund these improvements.

	LOCATION	MITIGATION IMPROVEMENT
1	LIE S. Service Rd.	Widening to provide additional EB through lane beginning at Eastbound LIE Exit 49S continuing easterly along Canon's frontage through WWR to meet widened EB approach just west of RT. 110. Upgrade Signalization.
2	Walt Whitman Rd. & LIE N. Service Rd.	Additional NB left turn bay. Additional WB Service Road through lane beginning west of Route 110 continuing through WWR to the westbound I-495 entrance ramp. SB roadway widening and realignment of west curb between NSR and Cottontail Road may be required and should be confirmed during final design. Upgrade Signalization
3	NYS RT. 110 & Old Country Rd.	Traffic Signal Modifications
4	NYS RT. 110 & LIE N. Service Road	Traffic Signal Modifications
5	NYS RT. 110 & LIE S. Service Road	Traffic Signal Modifications
6	NYS RT. 110 & Walt Whitman Rd.	Traffic Signal Modifications
7	Round Swamp Rd. & LIE N Service Road and S. Service Rd.	Traffic Signal Modifications

Prior to the Planning Board granting final site plan approval of the project, the Applicant, the Town and the New York State Department of Transportation will agree to an Infrastructure Implementation Plan that will detail the source of funding and the timing for the construction of the infrastructure improvements detailed above, and that final site plan approval will be subject to the acceptance of the Infrastructure Implementation Plan by the New York State Department of Transportation. The Applicant and the Town of Huntington will continue to work cooperatively to obtain grant financing or public monies for public infrastructure improvements in the project area.

### 3.5 On-Site Circulation Analysis

An on-site circulation analysis was completed utilizing the Highway Capacity Software (HCS+) and Synchro 6 Software. Four (4) locations were studied along Canon's Main Circulation Access Aisle. The complete analysis results are provided in Appendix G.

Table 3-15 presents the future "Build" Levels of Service at each of the unsignalized intersections included in this on-site circulation analysis utilizing HCS+ software. The unsignalized intersections are listed along with the Level of Service of their critical approach.

**Table 3-15 - On-Site Unsignalized Intersections - Build Analysis (HCM Methodology)**

Intersection	Build LOS	
	AM	PM
Main Access Aisle and Westerly North Parking Garage Driveway	A	B
Main Access Aisle and Easterly North Parking Garage Driveway	A	B
Main Access Aisle and Southerly Access Aisle	B	E

The proposed on-site circulation aisles analyzed with HCS+ Software would operate at a Level of Service “B” or better during the weekday morning peak hour and at a Level of Service “D” or better during the weekday evening peak hour. The Level of Service “E” expected at the Main Access Aisle intersection with the Southerly Access Aisle translates to a 95th percentile queue length of approximately four (4) vehicles which would be accommodated along the Main Access Aisle without obstructing mobility to the adjacent parking lot areas.

A capacity analysis for the Canon Main Site Driveway intersection with the Main Access Aisle has been conducted. Note that as this intersection is STOP-controlled at three (3) approaches and cannot be modeled in HCS+ Software or analyzed using HCM methodology in Synchro software, the analysis was conducted utilizing Synchro methodology in Synchro Software. The complete results of the analysis can be found in the Technical Appendix of this report.

Table 3-16 presents the future “Build with Mitigation” intersection capacity utilization (ICU) Levels of Service experienced at the unsignalized study intersection utilizing Synchro Software.

**Table 3-16 - On-Site Unsignalized Intersection - Build with Mitigation Analysis (Synchro Methodology)**

Intersection	Build with Mitigation LOS	
	AM	PM
Canon Main Site Driveway and Main Access Aisle	A	B

The proposed Canon Main Site Driveway intersection with the Main Access Aisle would operate at an ICU Level of Service “A” during the weekday morning peak hour and an ICU Level of Service “B” during the weekday evening peak hour.

### 3.6 Weaving Analysis

A Weaving Analysis was conducted at the LIE eastbound Exit 48 (Round Swamp Road) off-ramp and the LIE eastbound Exit 49S (Old Walt Whitman Road) off-ramp. A Synchro/SimTraffic analysis was conducted demonstrating the peak hour operating conditions of the two weaving segments under four (4) scenarios: Existing, No Build, Build, and Build with Mitigation.

The analysis indicates that the introduction of Canon's site traffic to these locations will be adequately served within the weaving segments identified above. The juxtaposition of the morning and evening split of site traffic and the adjacent peak roadway volumes demonstrates that Canon's peak arrival and departure times do not coincide with the peak periods of adjacent roadway activity. In general, the LIE South Service Road traffic volumes at Exit 48 are higher in the evening when Canon's additional traffic is projected to be comparatively low. Similarly, the LIE South Service Road traffic volumes are much higher in the morning when Canon's additional traffic is also projected to be comparatively low. In this manner, the anticipated site-generated volumes can be introduced into the surrounding roadway network in a safe and efficient manner as proposed within the site access management program.

### *3.7 Corporate Trip Reduction Initiatives*

In an effort to reduce the number of daily employee trips and to meet Leadership in Energy and Environmental Design (LEED) requirements, Canon U.S.A., Inc. has approved the following Employee Trip Reduction Initiatives for the new corporate headquarters:

- Commuter Choice Program
  - Canon coordinated with Long Island transportation management to participate in a Commuter Choice Fair on April 22, 2008 where transit and other commuter information were distributed to employees.
  - On December 10, 2008 Canon launched a Commuter Choice Fair in coordination with Long Island Transportation Management. Employees signed up for car-pools and incentives are being offered to employees who take mass transit or car pool to Canon's Long Island offices.
  - As part of the Commuter Choice Program, Canon implemented a "guaranteed ride program" to ensure a ride home for car-poolers in a time of emergency.
  - Canon is investigating employees paying for transit benefits with pre-tax dollars.
  - Encourage public transit and vanpools.
  - Evaluate a shuttle service between the train stations and Canon.
  - Provide reserved parking for both hybrid and electric vehicles and electric power sources/ outlets for recharging.
- Encourage use of bicycles by providing 40 bicycle spaces.

- Implementation of the following employee staggered arrival-departure program to minimize the concentration of site-generated traffic on the adjacent roadway network during peak hours:
  - 8:00 a.m. to 4:00 p.m.
  - 8:30 a.m. to 4:30 p.m.
  - 9:00 a.m. to 5:00 p.m.
  - 9:30 a.m. to 5:30 p.m.

The number of employees assigned to each pair of arrivals and departures would be determined as the corporate operation in Melville solidifies. These assignments will be based in part on where Canon's employees reside at the time the new office complex opens. The anticipated changes in the employee zip code distribution, as noted in the Trip Distribution section of this document, would be expected to affect the breakdown of the employee base in to the staggered arrival/departure program.

- Extend the time period that the departure gates are open as a result of the staggered arrivals/departures program so as to promote the progression of outbound traffic. Presently, the departure gate at the Lake Success facility is open from 5:00 p.m. to 5:30 p.m. only.
- Provide a bus stop for the MTA Long Island Bus line N95 along the Old Whitman Road site frontage.

Canon is also considering the following initiatives to further reduce employee traffic:

- Provide shuttle buses to and from the nearby Long Island Rail Road stations.
- Provide incentives for not using parking spaces.

An additional discussion on some of the above initiatives is provided in the following section, "Site Access and Circulation." Please note that in order to provide conservative analyses, credit for these employee trip reduction initiatives has not been applied to the traffic analyses provided herein. These initiatives would help reduce daily traffic to and from the site, and in that regard the traffic analysis overestimates the peak hour projections of traffic impact on the surrounding roadways.

### 3.8 Site Access and Circulation

A review has been made of the Site Plan for the proposed Canon Americas Headquarters prepared by Bohler Engineering and HOK Architects. Based on the proposed site layout, the Traffic Study (Appendix G) provided a summary of the key on-site elements. The following items address site access and on-site circulation.

#### Access

- Primary access along LIE South Service Road is proposed via one (1) right-turn ingress/right-turn egress unsignalized access point that would be subject to entering and exiting restrictions based on the time of day. This access point is proposed to be located west of the Exit 49S off-ramp from the Long Island Expressway to address NYSDOT concerns. No form of access is provided along the Long Island Expressway South Service Road between the Exit 49S off-ramp and Old Walt Whitman Road. Access would also be provided via two (2) full-movement driveways and one right-turn ingress only driveway along southbound Old Walt Whitman Road. The central driveway along Old Walt Whitman Road is proposed to be signalized and would serve as the office complex's main access point. The southerly proposed driveway along Old Walt Whitman Road would be primarily utilized by truck deliveries and employees and the northerly access point would accommodate inbound traffic during peak arrival periods.
- Based on "A Toolbox for Alleviating Traffic Congestion and Enhancing Mobility" published by the ITE, a reversible lane system is one of the most efficient methods of increasing rush-period capacity on a roadway. Once a reversible system is deemed necessary and feasible, the method of designating lanes to be reversed and the direction of flow must be selected. Three general methods are used to accomplish a reversible system and as such, it is proposed that the following are utilized for the Canon internal roadway system:
  - special traffic signals suspended over each lane
  - permanent signs advising motorists of the changes in traffic regulations and the hours they are in effect
  - physical barriers, such as traffic cones

These recommendations are also contained within the National Cooperative Highway Research Program "Convertible Roadways and Lanes, Synthesis 340" document.

- As the travel section parallel to the LIE South Service Road would be utilized reversibly (AM inbound, PM outbound), it is recommended that Figure 3B-6 of the Federal Manual of Uniform Traffic Control Devices (MUTCD) be consulted in the design of the necessary pavement markings and signage provisions along this on-site roadway. The lane lines should consist of broken double yellow lines to delineate the edge of each lane, as shown in the above-mentioned figure. It is also recommended that lane-use control LED signals be provided on an overhead structure within the reversible lanes section. A steady downward green arrow signal indication shall mean that a road user is permitted to travel in the lane over which the green arrow signal indication is located. A steady red "X" signal indication shall mean that a road user is not permitted to use the lane. The bottom of the signal housing of any lane-use control signal face shall be at least 15 feet but no more than 19 feet above pavement grade (Section 4J, MUTCD).
- The internal layout of the site access facilities would assist in balancing the external distribution of traffic to the adjacent roadway network. The driveway location along the LIE South Service Road would be designed to provide adequate separation distance from the Exit 49S off-ramp to minimize weaving conflicts along the site frontage. Employees looking to access the site from the LIE South Service Road would need to use Exit 48 (Round Swamp Road) as the driveway is proposed to be located west of the Exit 49S off-ramp.
- Each access point would be equipped with a guard booth and electronic remote access (similar to the E-Z Pass system). These checkpoints would be located far enough into the site to minimize the potential for queuing issues on the public roadways.
- A public bus stop for the MTA Long Island Bus Route 95 is proposed along the site's Old Walt Whitman Road frontage. This would afford employees and staff the ability to choose an alternative means of transportation, which in turn works to reduce the number of trips made to and from the complex via personal auto. This bus stop must be evaluated and approved by the MTA Long Island Bus Company.
- A circular drop-off area would be provided in front of the main building entrance to facilitate visitors, and certain deliveries.

### Parking

- The office building would be served by two (2) parking garages, one each on the north and south sides of the property. The opportunity for employee access on both

the LIE South Service Road and Old Walt Whitman Road would distribute traffic effectively to both parking garages.

- This circular area would also provide two bus stops to be utilized by Canon shuttle buses to/from the nearby Long Island Rail Road (LIRR) stations at Farmingdale and Huntington. This area would be flanked by a visitor parking area providing approximately 200 parking stalls.

#### Deliveries

- Primary delivery truck access would be provided at the south end of the site on Old Walt Whitman Road, and the delivery area would be situated away from the employee parking areas and visitor drop-off points. The on-site security team would be able to re-route any unauthorized trucks or other vehicles off the site through controlled access points.
- Based on delivery information obtained from Canon's Lake Success complex, the large majority of deliveries to the future Melville site are expected to take place during the middle of the day when traffic along the adjacent roadway network is below peak traffic volume levels. As such, delivery activity would generally not impede peak hour vehicular traffic flow on-site and along the adjacent roadway network.

### *3.9 Traffic Study Conclusions*

The Traffic Study (Appendix G) was prepared to examine the potential traffic impact of the proposed Canon Americas Headquarters. The HCS+ and Synchro Software Highway Capacity Analyses for the future conditions demonstrate that the traffic impacts generated by the proposed development would be mitigated to acceptable operating conditions within the noted study area once the recommended signal timing mitigation measures and roadway improvements are implemented as noted herein, which implementation will coordinate with Canon's phased developments.

The mitigation package presented consists of a three-fold approach, incorporating improvements from the NYSDOT's NYS Route 110 corridor project, the Town of Huntington's Old Walt Whitman Road corridor project and the proposed widening of the LIE North and South Service Roads and Old Walt Whitman Road. Together, these improvements would provide a significant transportation benefit to the Melville area. The proposed improvements, and the NYSDOT's and Town's area-wide infrastructure

upgrades must be coordinated to achieve a streamlined implementation for the traveling public.

Canon has committed to a staggered arrival/departure program whereby each employee of the Melville facility would be assigned to one of four pairs of staggered arrival and departure times. The Corporate Trip Reduction Initiatives is anticipated to reduce peak hour site-generated traffic within the surrounding roadway network, although no quantitative credit for this has been factored in this conservative Traffic Impact Analysis.

Once these improvements have been completed, the surrounding roadway network is expected to operate under parameters that are more conducive to traffic flows on these public facilities. The mitigation package as noted above would create the necessary capacity to process the traffic volumes associated with the proposed Canon Americas Headquarters.

### *3.10 Parking*

#### *3.10.1 Existing Conditions*

The existing site is undeveloped.

#### *3.10.2 Potential Impacts of Proposed Project*

Development of the Canon Headquarters will require 2,229 parking spaces in Phase I and an additional 649 in Phase II or a total of 2,878 spaces based on the code requirement for one (1) space per 300 square feet (Table 3-17). Indoor stalls would be 9 x 18 feet and outdoor stalls 9 x 20 feet as provided by code.

To maximize open space, two (2) structured parking garages are planned. The South Parking Garage will accommodate 802 vehicles and the North Parking Garage will accommodate 780 vehicles. Two (2) parking areas are also proposed at grade, which will accommodate 206 vehicles. In total, 2,229 spaces (including 441 landbanked spaces) are proposed for Phase I of the project and an additional 649 spaces for the Phase II expansion of the North Parking Garage. A total of 2,878 spaces are proposed, as required for the full build out. In the event that additional parking is required during Phase I, a portion of the Phase II parking garage is designated as permitted landbanked parking (Phase IA) in accordance with the Town Code that will accommodate the 441-space shortfall.

**Table 3-17 - Parking Requirements**

ITEM	CODE	PERMITTED	PROPOSED
Min. Stall Size	198.48	9'x20' or 9'x18' + 2' overhang	9' x 18' Indoor; 9' x 20' Outdoor
Min. Aisle Width	N/A	N/A	24'
Loading Requirements	198.54	1st 99,999 sf requires 3 spaces plus (1) for each additional 100,000 sf	11 spaces (including 5 landbanked)
Min. Loading Size	198.53	1st and/or 25% shall be 10'x25' balance shall be 12' x 35'	2 at 10' x 70' (landbanked) Balance at 12' x 70'
Min. Number of Spaces Phase I	198.47	1 Space/300 sf x 668,573 sf = 2,229 Spaces	North Garage 780 spaces South Garage 802 spaces At Grade Lots 206 spaces Landbanked * 441 spaces Total 2,229 spaces
Min. Number of Spaces Phase II	198.47	1 Space/300sf x 197,110 sf = 649 Spaces	North Garage 649 spaces
Min. Number of Spaces Total	198.47		2,878 Spaces
At Grade Parking Setback from Residential	198.34	50'	177'

\*Landbanked spaces will be built in Phase 1A if needed, or as part of Phase II.

### 3.10.3 Proposed Mitigation

Adequate parking would be provided for all uses and therefore no mitigation would be required.

## 4. Comments and Responses

This chapter addresses the comments received during the SEQRA public hearing and the public comment period on the DSEIS. The comments are grouped by subject matter, paraphrased, summarized and referenced to the original source. A complete copy of the public hearing transcripts and the written comments is provided in Appendix A – Hearing Transcript and Appendix B – Comment Letters.

### 4.1 General Comments

#### **Comment 1:**

*We have reviewed the Draft Supplemental EIS and concur that a permit from this Department for the proposed development will not be required. However, please forward us copies of any future Environmental Impact Statements or Traffic Impact Studies so we can gauge the potential impacts, if any, on the local County roadway network. (Letter from SCDPW, September 23, 2008)*

**Response:** Comment noted.

#### **Comment 2:**

*Plans, maps and figures in the document shall distinguish New York State land identified as 0400-254-01-008 on the Suffolk County Tax Map from the subject property. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** Canon's consultants identified an error on the Suffolk County Tax Map. The map was corrected by the Suffolk County Clerk's office. The corrected Tax Map is provided in Appendix F and delineates Tax Lot 8 and the subject parcel.

#### **Comment 3:**

*Figure 1-3 Master Plan shows Phase II, while the Rendered Master Plan Figure 1-4 does not. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** Figure 4-1 has been updated to reflect Phase II.

**Comment 4:**

*Is there an on-site cafeteria and food service for the workers? (Planning Board Hearing Minutes, page 19, October 1, 2008)*

**Response:** Yes.

**Comment 5:**

*What is the trigger to build Phase II and will it be sublet? (Planning Board Hearing Minutes, pages 28-29, October 1, 2008)*

**Response:** As the Canon employee base grows, Phase II will be implemented by Canon to accommodate the additional employees. Phase II is expected to be completed by Year 2020. The additional space will not be sublet, licensed or used by any entity other than Canon. This is a Canon site for Canon.

**Comment 6:**

*Is Canon planning on partnering with the local school district (i.e., the Half Hollow School District) through mentoring programs, scholarships or other initiatives? (Planning Board Hearing Minutes, pages 44-45, October 1, 2008)*

**Response:** Canon is very committed to the local economy and the local school district. Canon is a technological innovator and there will be programs devoted to local education, especially in the science and mathematical fields.

**Comment 7:**

*Describe the proposed uses of the facility, e.g., office, research, and/or manufacturing. (Planning Board Hearing Minutes, pages 29-30, October 1, 2008)*

**Response:** This will be the world headquarters for the North and South Americas of Canon, USA. It will be a corporate workspace. Research and product development will be conducted at this facility. This will not be a manufacturing site; thus no raw materials will be shipped into the facility.

#### 4.2 Stormwater Collection, Treatment and Recharge

##### **Comment 8:**

*The document should describe the storm water management plan for Phase II of the development plan and demonstrate that it will conform with the Town's Site Improvement Specifications. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** The stormwater disposal system for the Phase I development of the subject property consists primarily of several Drainage Reserve Areas (DRAs) spread throughout the site, each of which includes a number of drywells to allow stormwater to infiltrate into the ground. The Phase I system was designed to process a 100-year 24-hour rainstorm (7.5”), with stormwater being stored temporarily in the aboveground DRAs and being contained on-site, exceeding the LEED standard.

The Phase II development will involve expansion of the main building by approximately 204,000 SF (five stories, with a 42,000 +/- SF footprint), and expanding the north parking garage by 297,000 SF (three stories, with a 99,000 SF footprint). This expansion will occur in areas of the site that in Phase I are proposed as landscaping. This new development will increase the area of impervious surfaces on-site and therefore will result in an increase in the amount stormwater runoff generated.

In Phase II, just as in Phase I, stormwater runoff will be directed to the on-site drainage reserve areas and then into the ground via drywells. Roof drainage from the office expansion and parking deck drainage (after suitable quality treatment) will be directed to DRA “A” at the east side of the site, which has more than enough capacity available to accommodate the increased volume. The Phase II expansion of the office building and north garage do not encroach on the proposed Phase I DRAs, nor will they impact the capacity of the DRAs. The expansion will cause minor interruptions to the Phase I surface drainage patterns, increasing the size of Tributary Area “A”.

As stated above, the Phase II development will generate additional runoff. In a 9” rainstorm this additional runoff will exceed the storage capacity of the site as established in Phase I. To accommodate this additional volume of runoff, it will be necessary to install an additional 200 vertical feet of drywells, which will be located within the limits of DRA “A”.

**Comment 9:**

*The Town's requirement for nine (9) inches of stormwater storage before off-site overflow should be indicated. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** The revised site plan includes an analysis of runoff and storage for a 9” storm in both Phase I and Phase II and indicates the quantity of drywells required to contain such a storm and their location on the site.

**Comment 10:**

*The document shall mention Town Code § 170: Stormwater Management regarding the requirement for a Stormwater Pollution Prevention Plan. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** A full SWPPP has been prepared for this site in accordance with Town Code § 170: Stormwater Management.

**Comment 11:**

*The symbols: "++" in Table 7-1 shall be identified. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** These symbols have been removed. A revised Table is provided below.

**Table 4-1 –Bulk Dimensions for Required and Provided Light Industry Zoning**

ITEM	REQUIRED	PROVIDED
Min. Lot Area (Building over 58' High)	10 AC	2,272,866sf (52.17AC)
Min. Lot Width	400'	870.2'
Min. Front Yard Walt Whitman Road	100'	273' (Guard Booth) 806.7'(Bldg.); 789.8' (Garage)
Min. Side Yard (LIE South Service Road)	50'	50' (Guard Booth) 103.3" (Garage); 289.4' (Bldg.)
Min. Rear Yard	50'	266.7' (Garage); 489' (Bldg)
Max. Building Height: Stories (Height)	6 stories (90')	6 Stories (partial) and 1 Basement
Max. Lot Coverage for Principal Building (Excluding Parking Structure)	20% of 2,272,886 SF = 454,577.2 SF	Phase I = 137,423 SF Phase II = 42,000 SF TOTAL = 179,423 SF (7.9%)
Residential Setback for Exterior Walls Greater than 58' Above Finished Grade	250'	289.2'

**Comment 12:**

*The December 1990 "Study of Man-made Ponds in Suffolk County New York" prepared by the Suffolk County Planning Department, should be included as one of the recommended publications in helping design the project's proposed ponds. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** Pond components would be based on features recommended in publications such as *Design of Stormwater Wetland Systems*<sup>2</sup>, Best Management Practices recognized by the NYSDEC, and the December 1990 "Study of Man-made Ponds in Suffolk County New York" prepared by the Suffolk County Planning Department.

#### 4.3 Ecological Resources

**Comment 13:**

*Indicate that your project will contain the required conservation easement and Covenants and Restrictions to preserve 35% of the existing steep slopes on site. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** Canon shall comply with the Town's steep slope ordinance. Figure 4-2 shows that that steep slopes comprise a total of 392,773 square feet (9.02 acres) with an average slope of 20.96%. Based on the proposed limit of disturbance, more than 60% of the slope land will remain undisturbed. According to the Town ordinance, 35% of the steep slope is required to be preserved in a conservation easement, or in this case, 137,471 square feet (3.16 acres). The proposed location for the easement is shown on Figure 4-2. The easement language will allow for the installation of passive recreational elements including trails, benches and blue-light phone stations within the conservation area.

---

<sup>2</sup> *Design of Stormwater Wetland Systems* - Anacostia Restoration Team, Metropolitan Washington Council of Governments, October 1992.

#### 4.4 Land Use and Zoning

##### **Comment 14:**

*Section 7.1.1 of the document shall note The Draft Comprehensive Plan Update - July 2008/Draft Generic Environmental Impact Statement (DGEIS) is available. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** This section is revised as follows:

##### 7.1.1 Existing Conditions

The Town is in the process of preparing a new Comprehensive Plan. In 2004, the Town issued a Community Visioning Report, followed by a Comprehensive Plan Update Goals, Policies, and Action Strategies Report in 2006 and a Draft Comprehensive Plan Update/Draft Generic Environmental Impact Statement (DGEIS) in July 2008. The Strategic Initiatives identified through this process are:

- Retrofit the road network to enhance operational efficiency and reduce traffic congestion.
- Expand network of permanently preserved open space and protect sensitive environmental resources.
- Alleviate substandard housing conditions while promoting a more diverse, affordable housing stock.
- Raise the bar on development quality and sustainability
- Improve the appearance and viability of commercial corridors.
- Achieve a more sustainable future through measures that conserve energy, reduce carbon emissions, and promote a healthy environment.

The Generalized Future Land Use (Figure 7-1) shows the project site to be part of the Melville Employment Center.

The subject property is comprised of several tax lots (Tax Map Nos. 400-254-1-4, p/o 400-254-1-8, 400-254-1-9 and 400-254-2-4) and is currently vacant. Approximately 40 of the acres were in agricultural use.

#### 4.5 Parking

##### **Comment 15:**

*The project does not include all of the required parking spaces for Phase I development. On page 1-6, the document states "In the event that additional parking is required during*

*Phase I, an area has been designated as landbanked parking which would accommodate the 528-space shortfall". This sizable parking area must be shown on layout plans in order to determine compliance with the requirements of the Town of Huntington Code. Until all of the Town Code required parking stalls (to include land-banked parking) are depicted on the layout plans, the project will not be in conformance with Town Code as stated on Page 1-5. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** A new sheet C-3.5 has been added to the site plan set which indicates a "Phase I A" expansion to the north parking garage to accommodate the additional stalls required. Please note that as discussed in Section 2 herein, the revised parking computations prepared in accordance with the town standards and the revised parking counts in the two garages have reduced the additional parking required from 528 stalls to 441 stalls.

#### 4.6 Transportation

##### 4.6.1 Traffic Impact Analysis Methodology

###### **Comment 16:**

NYS Route 110 @ Walt Whitman Road/Durvea Road: Signal modification is recommended by the applicant. However, as noted above incorrect cycle lengths and phasing is used for various traffic analysis presented in the report. This would present inaccurate traffic operating conditions when comparing between the various condition scenarios. (Letter from GPI dated October 07, 2008)

**Response:** The signal timings utilized in this analysis are in accordance with the NYSDOT official signal timings. As presented in the future weekday morning "build with mitigation" condition at this intersection, 12.5 seconds from the NYS Route 110 through and right-turn movement phase would be reallocated to the protected NYS Route 110 left-turn movement phase. This signal timing modification would allow the intersection movements to operate at "no-build" or better Levels of Service. Note that signal timing modifications are not proposed during the weekday evening peak hour "build" condition. This is because only minor delay degradations would be expected at this intersection during the weekday evening peak hour with the construction of the Canon site.

**Comment 17:**

*At Route 110 / LIE South Service Road, the PM delay of 216.6 seconds for the eastbound left turn under the '2010 Build w/Mitigation' scenario is not acceptable, as the '2010 No-Build w/Town & DOT' is only 78.1 seconds. Further mitigation measures should be investigated. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Per feedback from NYSDOT, the LIE North Service Road and LIE South Service Road corridors have been modified to run as respective coordinated corridors and per to official NYSDOT timing sheets. As such, the PM delay for the eastbound left-turn/through movement at the intersection of Route 110/LIE South Service Road under '2010 No-Build with Town and DOT improvements' is now 41.8 seconds. Under the "2010 Build with Town and DOT improvements" scenario, the movement shows a delay of 65.5 seconds. As such, an increase in delay of 23.7 seconds for this movement can be expected with the development of the project. Please refer to the Synchro files provided.

**Comment 18:**

*Depending on the length of the 3<sup>rd</sup> lane added to the eastbound Service Roads approaching Walt Whitman Road, there may be an affect on the LIE entrance and exit ramps. If the ramps are affected, FHWA involvement will be necessary. All widenings must occur on Canon's property. i.e., south side of eastbound service road. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Based on our coordination with your office, it is our understanding that if FHWA involvement is necessary, the NYSDOT will undertake the coordination with this agency to achieve concurrence on the proposed access plan. Based on prior discussion, we understand that the control of access along the South Service Road would be modified to accommodate Canon's proposed driveway at the northwest corner of the site.

**Comment 19:**

*The "2008 EXISTING" eastbound through AM delay on the LIE South Service Road at Round Swamp Road is shown as 44.9 seconds, with the '2010 Build' AM shown as 222.7. This much delay will require mitigation Measures beyond simple timing changes, as proposed. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Per our latest submission to NYSDOT on August 29, 2008, the eastbound through AM delay on the LIE South Service Road at Round Swamp Road (modeled in Synchro) is shown as 27.8 seconds in the ‘2008 Existing’ scenario. The ‘2010 No-Build with Town and DOT improvements’ scenario shows a delay of 28.2 seconds and the ‘2010 Build with Town and DOT improvements’ scenario (utilizing signal timing mitigation only) shows a delay of 51.8 seconds. As such, an increase in delay of 23.6 seconds for this movement can be expected with the development of the project. Please refer to the Synchro files provided.

**Comment 20:**

*Even if all the mitigation measures identified in the DEIS somehow come to fruition, they are inadequate. Additional mitigation will be required to be provided by the Town to insure that all impacts are adequately addressed. CANON states in the DEIS that “[t]he extent of the NYSDOT and Town projects, which are already funded, provide more mitigation than required to mitigate Canon’s anticipated impacts alone.” (See, DEIS 1.1.6, p. 1-6; DEIS 8.8, p. 8-18). This statement (and the analysis that leads to that statement), is clearly incorrect as the scheduled/planned Town and State roadway improvements were planned before the CANON proposal came to fruition, and are a result of existing traffic constraints in the area. The DEIS implies that these planned improvements alone are sufficient to mitigate all impacts; however, clearly these measures alone are not adequate to address all of the likely impacts. More will need to be done. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** Again, LBA Melville Associates LP has not based this comment on a Traffic Engineering Analysis with regard to the mitigation measures being “inadequate.” ATDE stands by the analysis results and mitigation program provided within the Traffic Impact Analysis. Our office will continue to coordinate with the relevant jurisdictional agencies to further discuss and confirm the adequacy of the proposed mitigation program.

**Comment 21:**

*Finally, we would like to bring to the Town’s attention that LBA observed that in the late afternoon and evening peak hours on Tuesday, September 30, 2008, there were individuals on the Walt Whitman Road bridge taking traffic counts. We do not know who these individuals represented or for what purpose they were taking counts.*

*However, we would like to point out to the Town Board, Planning Board and staff that any such counts are flawed and invalid due to the fact that the day on which these counts were taken was the Jewish holiday of Rosh Hashanah, and the traffic volumes on this day are at least 25% to 30% less than on a normal day. Accordingly, any count done by the Town of by the Applicant on this date should not be taken into consideration as an accurate reflection of the traffic volumes that are experienced at these points. (Letter from LBA Melville Associates LP dated October 13, 2008)*

**Response:** No traffic counts for the Canon development project were conducted on Rosh Hashanah, September 30, 2008. The counts were conducted in January 2008 during typical weekday peak hour traffic conditions. Furthermore, in accordance with the Town's traffic consultant, GPI, ATDE has adjusted the traffic volumes collected during the count effort to account for seasonal fluctuations and as such an appropriate growth factor has been applied.

**Comment 22:**

Mitigation Analysis - It is not clearly defined in the study report what mitigation measures would be the responsibility of the applicant. At times the traffic study is making "assumptions" that the NYSDOT would extend its NYS Route 110 project limit by adding additional lane on the LIE North and South Service Road to avoid otherwise non-mitigatable traffic impacts resulting from the proposed projects. However, to our knowledge the "assumed" service road widening is not being design or would not be done by DOT. Thus, the applicant should not take credit for additional lanes what will not exist. The no-build analyses need to be revised to eliminate the extra lane in that condition and build condition scenarios to more accurately reflect the anticipated traffic impacts associated with the project generated traffic. Then appropriately added it to the Build w/mitigation scenario to ascertain the benefit. (Letter from GPI dated October 07, 2008)

**Response:** Based on continued discussions and consultations with the Town of Huntington and the NYSDOT, the widening improvements along the North and South Service Road will be the subject of an Infrastructure Improvement Plan that will detail the source of funding and the timing of construction. Final site plan approval shall be subject to the acceptance of this Plan. For that reason, the analysis conditions have not been modified. Additional information regarding the funding and construction schedule will be provided once obtained from the NYSDOT.

**Comment 23:**

*LIE North and South Service Road @ NYS 110: Lane configuration and intersection geometry is not consistent with NYSDOT improvements in analysis of Build with DOT improvements. Please modify the analysis accordingly and re-evaluate signal timing mitigation measures for various peaks. (Letter from GPI dated October 07, 2008)*

**Response:** The lane configurations and geometries at these intersections have been modified to be consistent with the official NYSDOT roadway improvement plans. In addition, the analyses and signal timings at these intersections have been reevaluated under the “Build with Mitigation” conditions during both peak hours studied.

**Comment 24:**

*NYS Route 110 @ Old Country Road: The proposed condition analysis is not consistent to the DOT's geometrical improvements at this intersection. The southbound right turns would be eliminated from this intersection and would be routed via an adjacent newly proposed slip ramp aligned to Walt Whitman Road. There is also different lane geometry used for its Eastbound and Southbound movements than proposed by DOT. Additionally, the westbound right turns are considered as free movements in all the analysis presented for this intersection even though there only exist a small deceleration lane (with limited storage). Since adjacent lane queues will likely block access into the slip ramp this movement should be included in the analysis and should not be considered as free in the no-build conditions. The proposed signal timings should also be coordinated with the adjacent Walt Whitman Road/Old Country Road Signal timing. (Letter from GPI dated October 07, 2008)*

**Response:** The future “no-build” and “build” condition analyses at the NYS Route 110 and Old Country Road intersection have been revised to include roadway geometrics consistent with the official NYSDOT roadway improvement plans. The southbound NYS Route 110 right-turn volumes have been eliminated from the “no-build” and “build” analyses which incorporate the Town and NYSDOT improvements since that movement would be accommodated via a new ramp connecting Old Walt Whitman Road to southbound NYS Route 110. Further, the westbound Old Country Road channelized right-turn movement has been included in

the existing, “no-build,” and “build” analyses. Signal timing modifications are not proposed during the weekday morning peak hour “build” condition. This is because minimal delay degradations would be expected with the construction of the Canon site. In addition, the Levels of Service at each movement would operate at the “no-build” Levels of Service. A 90-second cycle length is proposed during the weekday evening “build” condition to allow each of the intersection approaches to run at the “no-build” Levels of Service. The proposed 90-second cycle length would also decrease the overall intersection delay by 8.3 seconds during the weekday evening peak hour. It is acknowledged that the proposed signal timings would need to be coordinated with the adjacent Old Walt Whitman Road/Old Country Road signalized intersection. Please note, the intersection has been analyzed using the HCS Capacity Analysis program and typically a channelized right turn movement would be analyzed under a free flow condition. However, as noted, a queue in the westbound through lane would effectively block the ability of vehicles to complete the westbound right turn movement. In an effort to model this traffic pattern, the right turn was placed under signal control and a conservative number of vehicles were assumed to complete the right turn on red. Please note, the development project would not be expected to add traffic volume to this specific movement.

**Comment 25:**

*The signal on the LIE South Service Road at Round Swamp Road is analyzed as an uncoordinated signal. However, this signal is currently operating in coordination with the signal on the North Service Road at Round Swamp Road. The mitigation measures of simply increasing the cycle length to 100 seconds does not take into account the limited storage under the bridge between, these two signals. The Synchro analysis should incorporate the signal on the North Service Road to show that a gridlock condition will not exist with a 100 second cycle length. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The Synchro “Build with Mitigation” files have been revised to incorporate the intersection of Round Swamp Road and LIE North Service Road in coordination with the intersection of Round Swamp Road and LIE South Service Road. It can be seen that with the incorporation of appropriate signal timing modifications at these two intersections, adequate capacity along the segment of Round Swamp Road located between the two subject intersections is available and does not generate a gridlock condition. Please refer to the Synchro files provided.

**Comment 26:**

*The Highway Capacity Software (RCS) analyses for "2008 EXISTING" scenarios utilize cycle lengths that are not in effect at the intersections of Route 110 at Duryea Road, Rt. 110 at LIE South and North Service Roads, and Route 110 at Old Country Road. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The Route 110 intersections with Duryea Road and Old Country Road have been modified in the Highway Capacity Software (HCS) analyses to utilize the cycle lengths listed in the NYSDOT official signal timing plans. Per our latest submission to NYSDOT on August 29, 2008, the intersections of Route 110 at the North and South Service Roads have been modeled in Synchro and utilize the correct cycle lengths per official NYSDOT timing sheets. Please refer to the Synchro files provided.

**Comment 27:**

*There are significant differences (Canon is 1 to 3 letter grades lower) in the intersection LOS at the intersections of NY 110 and the South Service Road, North Service Road, and Old Country Road as projected by the build capacity of PIN 051.6.41 and Canon's Report for "No-Build with Town and NYSDOT mitigation". This difference is greater than what could be expected from differences in traffic counts taken on different days. There should be agreement between these estimations or an explanation why they are different. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Our office has conducted both the data collection effort and intersection capacity analyses in accordance with accepted standards of Traffic Engineering Assessment. Additionally, the analysis has been performed using both HCS Software and Synchro Simulation Analysis Programs which are industry standards. Therefore we maintain that the results and findings contained within the Traffic Impact Analysis are valid.

**Comment 28:**

*The Traffic Impact Analysis (Rev. 8/27/08. Volume 1 of 3, Pg 20); the schedule for the roll out of PIN 0516.41 is not current. NYSDOT anticipates to deliver the NY 110 improvements in two projects as follows (note change in project limits);*

- *SSR to Nikon Driveway - Letting Fall 2008; Construction Spring 2009 to Summer 2011*
- *Nikon Driveway to Arrowwood Lane - Letting Winter 2010; Construction Summer 2010 to Summer 2012 (Letter from NYSDOT dated October 24, 2008)*

**Response:** The Traffic Impact Analysis and Mitigation Table within the Technical Appendix has been updated to reflect the most recent timeline for PIN 0516.41, as per your comment above.

**Comment 29:**

Capacity Analysis - Please check, verify and modify the cycle lengths, phasing and offsets used for HCM/Synchro analysis at the following signalized intersections as they do not appear to match the official NYSDOT or Town of Huntington signal timings during various peak hours. The use of inaccurate signal timing data will cause differing level of service results than expected. As requested earlier in the body of this letter, a table for each signalized location of the discreet signal timing data (timing, cycle lengths offsets, etc.) would be helpful. (Letter from GPI dated October 07, 2008)

1. Duryea Road and Route 110.
2. Old Country Road and Route 110
3. Sweet Hollow Road and Old Walt Whitman Road.
4. LIE North Service Road and Old Walt Whitman Road (different phasing and offsets used).
5. LIE South Service Road and Old Walt Whitman Road (different phasing and offsets used).
6. Pineridge Street and Old Walt Whitman Road
7. Northgate Circle/Baylis Road and Old Walt Whitman Road
8. LIE South Service Road and Route 110 (different offsets used)
9. LIE North Service Road and Route 110 (different offsets used)
10. Round Swamp Road and LIE South Service Road (different offsets used)

**Response:** The included capacity analyses within the Traffic Impact Analysis have been modified to be in accordance with the official New York State Department of Transportation (NYSDOT) or Town of Huntington timings. Please note, the official NYSDOT and Town of Huntington signal timings that were utilized for each intersection analyzed are provided in the revised Traffic Impact Analysis Technical Appendix.

Duryea Road and Route 110 - The cycle length and phasing utilized at the Duryea Road and NYS Route 110 signalized intersection have been modified to be in accordance with the official NYSDOT signal timings during both studied peak hours. Please note that the difference in the allocated green time along Route 110 when compared to the official timings is due to the actuated nature of the traffic signal. Further, the signal timings utilized in the analysis were found to be consistent with the various field timings collected.

Old Country Road and Route 110 - The cycle lengths and phasing at the Old Country Road and NYS Route 110 intersection have been revised to be in accordance with the official NYSDOT signal timings. Based on the field timings collected at this intersection, it was confirmed that the timings utilized in our analysis are consistent with the existing signal operation and are within the allowable range per the official NYSDOT signal timing plans.

Sweet Hollow Road and Old Walt Whitman Road. - The signal timing has been modified to consist of a 60.5 second cycle length during both peak hours studied, per the official Town of Huntington signal timing plans.

LIE North Service Road and Old Walt Whitman Road (different phasing and offsets used) - The phasing has been modified for both peak hours to be in accordance with the official NYSDOT signal timing plans. Please note, any minor difference in phasing time is due to the actuated nature of the traffic signal. As field timings were collected at this intersection, the prevalent timing was calculated, confirmed to be within the allowable range per the official NYSDOT signal timing plans, and utilized in our analysis.

LIE South Service Road and Old Walt Whitman Road (different phasing and offsets used). - The phasing has been modified for both peak hours to be in accordance with the official NYSDOT signal timing plans. Please note any minor difference in phasing time is due to the actuated nature of the traffic signal. As field timings were collected at this intersection, the prevalent timing was calculated, confirmed to be within the allowable range per the official NYSDOT signal timing plans, and utilized in our analysis.

Pineridge Street and Old Walt Whitman Road - The signal timing has been modified to consist of a 70 second cycle length during both peak hours studied, per the official Town of Huntington signal timing plans.

Northgate Circle/Baylis Road and Old Walt Whitman Road - The signal timing has been modified to consist of a 70.6 second cycle length during both peak hours studied, per the official Town of Huntington signal timing plans.

LIE South Service Road and Route 110 (different offsets used) - The phasing has been modified for both peak hours to be in accordance with the official NYSDOT signal timing plans. Please note, any minor difference in phasing time is due to the actuated nature of the traffic signal. As field timings were collected at this intersection, the prevalent timing was calculated, confirmed to be within the allowable range per the official NYSDOT signal timing plans, and utilized in our analysis.

LIE North Service Road and Route 110 (different offsets used) - The phasing has been modified for both peak hours to be in accordance with the official NYSDOT signal timing plans. Please note, any minor difference in phasing time is due to the actuated nature of the traffic signal. As field timings were collected at this intersection, the prevalent timing was calculated, confirmed to be within the allowable range per the official NYSDOT signal timing plans, and utilized in our analysis.

Round Swamp Road and LIE South Service Road (different offsets used) - Per consultations with NYSDOT, this intersection is coordinated with the adjacent intersection of Round Swamp Road & LIE North Service Road. Since the NYSDOT has requested that the intersection of Round Swamp Road and LIE North Service Road be included in the study. The Synchro analysis reflects the appropriate coordination and offsets between those two signals.

**Comment 30:**

*A great many locations identified the need to revise the signal timings. These generally are very low cost improvements provided the existing signal equipment can accommodate the changes in phasing if requested. However, as part of GPI's comments outlined later in this document it appears that not all the proper and current timings, cycle lengths and offsets may have been utilized in the analysis and as such, the inputs need to be reviewed. In any case, we specifically request ATDE to list all such timing, phasing, cycle length and offset data in a table that was used for each signal and then in an adjacent column what signal modifications are being proposed. The State attends to signal timing, especially in a corridor such as this, with great attention. Signal timing modification can readily help many situations but they have to be done logical and in coordination with adjacent locations and the systems they may already be a part of. Independent changes at one location may not coordinate well with adjacent locations. A summary table of the before and after recommendations would be extremely useful and help expedite the review. (Letter from GPI dated October 07, 2008)*

**Response:** It has been challenging to receive the most current signal timing directives for all of the intersections contained within the study, but with the help of the Town and the NYSDOT, all appropriate signal plans have now been implemented within the last revised Traffic Impact Analysis. For clarity, the signal timing plans have been provided within the Technical Appendix. The Traffic Impact Analysis also includes a detailed description of recommended modifications to cycle length as well as coordination offsets to adequately accommodate progression in the future condition.

**Comment 31:**

*Unfortunately, as it relates to traffic conditions, CANON is relying primarily on infrastructure improvements that are already planned by the Town of Huntington and New York State (See, DEIS 8.2.2, p.8-4; DEIS 8.4, p.8-9). These planned improvements are already warranted based on current conditions, so CANON's project warrants even more changes to be made. CANON's incremental mitigation is limited to signalization changes, and addition of lanes on its own frontage. These will primarily benefit CANON in allowing its employees and visitors to access the site. The overall relief of the general traffic conditions in the area will be limited.*

*CANON's overreliance on already planned improvements is inadequate and faulty. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** The infrastructure improvements planned by the Town of Huntington and NYSDOT are proposed to (a) mitigate existing operational deficiencies and (b) to accommodate traffic growth throughout the adjacent roadway network in a proposed future condition. Transportation Planning procedures generally dictate that infrastructure improvements are not proposed to provide enough capacity to only accommodate existing deficiencies. It is noted that both the Town and the NYSDOT would likely not have incorporated the potential impact of a 900,000 square-foot office complex as part of the proposed development program; however, it is our understanding that the subject property has been slated for redevelopment for some time as part of general planning within the Town and as such should be expected to benefit from a portion of the capacity improvements proposed within the area.

**Comment 32:**

*The clearance times in the HCS analyses are less than the existing combined yellow and red clearance times at each intersection. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The clearance times utilized in the HCS analyses have been revised to be consistent with the NYSDOT official signal timing plans.

**Comment 33:**

*The traffic survey was conducted after many businesses on Baylis Avenue closed down. Thus, the traffic survey does not include these missing vehicles. These offices will be reoccupied once the economy rebounds, compounding the impacts of the traffic growth from the proposed Canon offices. (Form Letters 1, 2, 3, 5 and 6)*

**Response:** The Traffic Impact Analysis, conducted by ATDE is based on traffic count data collected in January 2008. The Canon development team understands the public's concern about potential business vacancies within the study area and the resulting incompleteness of traffic data. It is important to note that ATDE applied a growth factor to conservatively account for future development and reoccupation of existing vacant building space. ATDE's approach is an accepted Traffic Engineering methodology as it conservatively increases traffic volumes into the future to account for such "latent" development; that is, development that takes place

after the data collection effort and before the Canon project is constructed and occupied.

**Comment 34:**

*Nonetheless, it is clear that CANON development, on top of already unacceptable traffic conditions, will make these conditions much worse. The CANON DEIS acknowledges this exacerbation of conditions. However, the DEIS must be revised to have more realistic and conservative projections as to likely impacts, and to provide for more intensive mitigation. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** The assessment contained within the Traffic Impact Analysis is in accordance with industry accepted analysis procedures for determining the traffic-related impacts of a development program on the adjacent roadway network.

**Comment 35:**

*The traffic impacts on Old Walt Whitman Road and South Service Road are expected to be significant. Commuters exiting Canon onto the South Service Road in the afternoon and evening will have to merge with eastbound traffic. This will generate a traffic problem because of the lack of a traffic light on the South Service Road egress. Some of these commuters will want to go west, and will therefore queue up in long lines at the South Service Road/Old Walt Whitman Road intersection. (Planning Board Hearing, October 1, 2008, 7:30 PM, Town Hall, 100 Main Street, Huntington, NY.)*

**Response:** A comprehensive Traffic Impact Analysis has been prepared to address the numerous intersections studied as part of this assessment. The NYSDOT has reviewed the proposed access along the South Service Road and has been satisfied with the Synchro simulation model analysis as well as the intersection capacity analysis of this specific location. A detailed distribution of motorists destined to travel east and west has been provided within the study and the analysis results indicate effective progression of traffic during the peak hours.

**Comment 36:**

*Proposed Traffic Volume Network Future Traffic Projections - The future traffic assignments resulting from the Canon's zip code assessment is acceptable. While we do not necessarily agree with all the assumptions it appears satisfactory to use in the analysis. However, please provide the actual number of employees originating from*

*each region (towns) in the spreadsheets used for calculating the trip distribution percentages. (Letter from GPI dated October 07, 2008)*

**Response:** It is acknowledged that the future traffic assignments resulting from the zip code assessment is acceptable by GPI. The zip code data distribution spreadsheets located in the Technical Appendix of the Traffic Impact Analysis have been revised to depict the actual number of employees originating from each region as requested.

**Comment 37:**

*Is the Traffic Impact Analysis (Rev. 8/27/08, Volume 1 of 3, Pg 19), based upon a full build out (i.e., Phase I and Phase II) or, just Phase I? It should be for both Phases. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The current version of the Traffic Impact Analysis, dated October 27, 2008, as well as the revision dated August 27, 2008, are based on a full build-out of the Canon project (Phases I and II) for conservative analysis purposes.

**Comment 38:**

*Since there is some speculation as to a shift in the site generated trip distribution once Canon relocates its headquarters to Suffolk County and the NYSDOT and Town's improvement project schedules are not certain in relation to Canon's construction, we recommend the developer reanalyze this site two years after full occupancy for Phase I using real data and perform any mitigation found necessary at that time, above and beyond mitigation previously performed. (Letter from Town of Huntington Highway Office dated October 10, 2008)*

**Response:** The Traffic Impact Analysis prepared for the Canon project is based upon a full development build-out, inclusive of that which is expected to be built and occupied as many as 20 years into the future. As a result, the analysis that is presented is very conservative. The distribution of traffic to and from the site was based on the zip code data analysis provided within the Traffic Impact Analysis and a reasonable assumption of a shift in the "journey-to-work" over time. Please note, the Town's Traffic Consultant, GPI, finds the site generated traffic distribution to be acceptable.

**Comment 39:**

*Last year's economic down-turn caused down-sizing and closure of mortgage companies across the country, several of which are located in the Melville area. American Home Mortgage, with 700, employees, was the largest company to close its offices which are located on Baylis Road, within the study's scope. The data for this study was collected in January when these offices were closed. Consideration should be given to adjusting the traffic volumes in this study to account for their eventual reoccupation. (Letter from Town of Huntington Highway Office dated October 10, 2008)*

**Response:** We understand that the recent economic conditions have forced some businesses in the Melville area to close and vacate office space. In accordance with standard Traffic Engineering practices, our office has applied a background traffic growth rate to account for redevelopment and additional development within the study area. It is unclear, of course, when and to what extent such redevelopment/reoccupation on Baylis Road would occur. As a result, the background traffic growth rate attempts to account for additional traffic that could potentially be added to the roadway network prior to or coincident with the build-out and occupation of Canon.

**Comment 40:**

*Discussions between ADTE and GPI indicated the need for Canon to consider Travel Demand Management or TDM techniques to address some of the traffic concerns. Specifically cited was the need to seriously consider staggered work shifts. For any employer of any size it is just a necessary operation of the facility for off-site traffic needs, on-site circulation and internal facility operations. As such, the mention of Canon's commitment to staggered work shifts where employees are specifically assigned various shifts to disperse the vehicle generation peaking conditions is lauded. However, since this initiatives would likely need to be part of the Town's approval stipulations the traffic study needs to reflect this possibility. Since staggered work shifts will have a measurable reduction in peak hour trips, it would be beneficial to ascertain such a benefit as it will result in lesser impacts and possibly some mitigation or at least the extent of some mitigation. (Letter from GPI dated October 07, 2008)*

**Response:** We do not disagree that staggered work shifts would lessen Canon's impact on traffic conditions. For the purposes of providing a conservative analysis, no reductions in ITE trip generation rates have been considered within the Traffic Impact Analysis.

**Comment 41:**

*The DEIS identifies a number of "soft" trip reduction measure that CANON proposes to rely upon in order to limit its mitigation. They include items such as implementation of commuter vanpool and shuttle bus incentive programs, carpooling incentives, bicycle incentives, staggered start and end hours, etc. (See, DEIS 8.6, p8-16) While these items are worthwhile from a policy standpoint, and helpful in theory, they are likely to produce little or minimal actual benefit in terms of reduced traffic volumes. History has shown on Long Island that this is primarily a single occupant vehicle culture and it should be expected that this will continue. Accordingly, the Town, in its analysis, should give little weight to these kinds of initiatives unless and until CANON is able to demonstrate in the future that there has been an appreciable impact from these measures. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** A number of the "soft" trip reduction measures referred to by LBA Melville Associates LP have specifically been requested by NYSDOT and the Town of Huntington to lessen the impact of site generated traffic during the peak hours. Again, LBA offers no discussion of transportation studies to discount the effectiveness of such Transportation Demand Management (TDM) measures. Research conducted by the ITE confirms that staggered hours "have been highly successful in reducing peak period traffic volumes" at specific office complexes. Furthermore, a commitment to public transportation and incentives to carpool demonstrates the applicant's dedication to reducing impacts on the adjacent roadway system. To maintain a highly conservative analysis, Atlantic Traffic & Design Engineers has not taken any credit for the trip reduction measures although it would be expected that the peak hour site generated traffic volume would be reduced as a result.

**Comment 42:**

*The CANON proposal calls for the addition of 3,000 additional vehicles per day to be parked on the CANON site (upon completing of Phase 2 of the project).*

*Conversely, their traffic analysis inexplicably estimates that only 2,736 vehicle trips per day will be generated to and from the site (See, DEIS 8.3.1, p. 8-7). We believe that actual trip generation from the CANON development will drastically exceed CANON's estimates. As one example, the CANON plan calls for the addition of 3,000 cars per day to the site (per its parking capacity), and that alone implies at least 6,000 vehicle trips per day to and from the site, without considering deliveries, employee trips at lunchtime, customers and visitor vehicle activity, etc. CANON's significant understatement of vehicle volumes to be generated from its site is seriously troubling since the effect of such understatement will be the minimization of the necessary suggested mitigation measures, and in the determination as to whether or not mitigation is adequate. Faulty assumptions such as this one will lead to inadequate and faulty mitigation. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** As contained within the Traffic Impact Analysis dated August 27, 2008 and the last revised version dated October 27, 2008, the industry standard Institute of Transportation Engineers (ITE) Trip Generation Manual has been utilized to determine the peak hour traffic associated with the proposed 900,000 square-foot office development. LBA Melville Associates LP incorrectly presumes that the data contained within the table on this page estimates the daily trips to and from the subject property. In accordance with industry standards, the weekday morning peak hour and weekday evening peak hour traffic has been calculated for the proposed development to conservatively assess the operations of the adjacent roadway network. Please note, the October 7, 2008 review letter issued by the Town's Traffic Consultant, Greenman Pedersen Inc. (GPI), does not challenge the Trip Generation Analysis prepared for the proposed development.

**Comment 43:**

*The CANON DEIS also does not adequately take into consideration all of the other ongoing or pending projects (e.g. the Rubies Costume project that is underway on the corner of the LIE South Service Road and Route 110 and any potential development of the LBA site under the new, upgraded zoning), or their impacts. Consideration of all ongoing, pending, and foreseeable projects is necessary to adequately analyze the complex, changing infrastructure needs. The Town can not analyze all of these projects (and other expected projects) in a vacuum, and must not segment the environmental impacts analysis. Segmentation of the analysis would not*

*only be illegal, but would cause the impacts to be minimized and the mitigation to be inadequate.* (Letter from LBA Melville Associates LP dated September 26, 2008)

**Response:** This statement is incorrect as Atlantic Traffic & Design Engineers has coordinated with both the Town of Huntington as well as NYSDOT to determine any approved site specific developments that could potentially impact the adjacent roadway network. To account for future background growth within the area, an ambient growth rate obtained from the NYSDOT specifically for the Town of Huntington was applied directly to the existing traffic volumes at a growth rate of 1% per year for two (2) years of growth. Additionally, our office has distributed the site generated traffic associated with the 103,000 square-foot Rubies Costume Company office complex throughout the roadway network which is consistent with the traffic study prepared by RMS Engineering for this specific development program. A description of this is contained on pages 19 through 21 of the Traffic Impact Analysis in the “no-build” condition section of the report.

**Comment 44:**

*The intersections of Walt Whitman Road and North/South Service Roads and the in-between LIE bridge is anticipated to get the maximum project generated traffic. At this point the proposed project does not call for a bridge widening. Thus, based on the Synchro assessments (for all analyzed scenarios), a 95% queue comparison table should be prepared and a discussion to discuss how the proposed mitigation measures would help in queue reduction on the narrow LIE bridge segment and improve traffic operations.* (Letter from GPI dated December 10, 2008).

**Response:** A 95th percentile queue comparison table was prepared by Atlantic Traffic & Design Engineers, Inc. for each movement that could impact the Old Walt Whitman Road bridge between the LIE North Service Road and the LIE South Service Road. Specifically, the table depicts the 95th percentile queue lengths for the northbound approach movements along Old Walt Whitman Road at the LIE North Service Road and the southbound approach movements along Old Walt Whitman Road at the LIE South Service Road for all analyzed scenarios and all analyzed peak periods.

The proposed mitigation measures are calculated to have an overall benefit on the roadway network when compared to the Build condition. In particular, the critical weekday evening northbound left-turn queue at the intersection of Old Walt

Whitman Road and LIE North Service Road is expected to be reduced by more than 50% during the weekday evening peak hour.

Based on the Synchro analysis and SimTraffic simulation inclusive of the proposed mitigation measures, the queuing that would develop along the Old Walt Whitman Road bridge segment would generally not impede or interfere with traffic operations at the adjacent signalized intersections. The queues were found to be principally maintained within the capacity of the bridge segment during both peak periods studies. Based on Synchro methodology, the 95th percentile queue will rarely be exceeded.

The analysis throughout this project has been conservative, as it does not factor the staggered employee arrival and departure program that would be implemented at the new office complex. Staggered arrivals and departures would effectively reduce peak hour traffic volume and queuing by distributing the exiting volume throughout the peak period.

**Comment 45:**

*We are concerned with the striping alignment of southbound traffic as illustrated in Figure Sheet 2 of 2 in the ATDE traffic study. It appears the southbound approach needed to be widened along the west curb between the LIE North Service Road and Cottontail Road to push the southbound lanes west to better align with the striping on the bridge. Please note this is mitigation that should be included in the final arrangement with the Town and as such GPI will recommend it. (Letter from GPI dated December 10, 2008)*

**Response:** Atlantic Traffic & Design Engineers, Inc. prepared Sheet 2 of 2, entitled the “Walt Whitman Road Detail” contained within the proposed Roadway Network Improvement Measures section of the Traffic Impact Analysis, to depict the proposed lane configuration along Old Walt Whitman Road at the North and South Service Roads. Please note, this plan has been prepared through coordination with GPI who prepared Signing and Striping Plans at this location. Note, the alignment of the southbound travel lane is consistent with the plan prepared previously by GPI. Sheet 5 of 7 of the Conceptual Roadway Improvement Plans, also contained within the Traffic Impact Analysis, has been revised accordingly.

**Comment 46:**

*According to the latest information (as of December 5, 2008), provided by the NYSDOT, the intersections of Old Country Road and Route 110, and Old Country Road and Walt Whitman Road would not be constructed by 2010 as initially planned. Thus, the intersection of Old Country Road and Walt Whitman Road would not be signalized and the geometrical and lane configuration changes at Old Country Road and Route 110 would not be accomplished by Canon's Build year. However, we believe that it is reasonable to assume that the State would likely reconsider and reconstruction of this location would happen in the future. It should be noted that as such, unless the applicant can demonstrate otherwise, they may be required to assume responsibility for these improvements due to project impacts. We suggest that some analyses be conducted at this location to quantify the impacts. (Letter from GPI dated December 10, 2008)*

**Response:** Atlantic Traffic & Design Engineers, Inc. has conducted a Highway Capacity Software (HCS) analysis for the Old Country Road intersections with NYS Route 110 and Old Walt Whitman Road. The No-Build and Build HCS analysis results, which appear in the Traffic Impact Analysis, incorporate only the Town of Huntington improvements, which is the provision of an additional northbound approach lane on Old Walt Whitman Road at Old Country Road. These analyses do not assume the construction of a traffic signal at the Old Walt Whitman Road intersection with Old Country Road or the widening of NYS Route 110 from two through lanes in each direction to three through lanes. As such, these analysis conditions would reflect the roadway configurations suggested by GPI.

As depicted in the Build condition HCS analysis results, the unsignalized movement at the Old Walt Whitman Road/Old Country Road intersection would continue to operate at the No-Build Levels of Service during both peak hours with the following exception: The westbound left-turn movement would degrade to an acceptable Level of Service B during the weekday morning peak hour. Due to the constrained operating conditions in the No Build scenario, we will continue to recommend, independent of the Canon project, that the NYSDOT and Town of Huntington seek signalization at this intersection.

Furthermore, the capacity analysis results indicate that each approach of the Old Country Road/NYS Route 110 intersection would operate at the No-Build Levels of Service during the weekday morning and weekday evening peak hours with the

following exceptions: The westbound Old Country Road left-turn/through/right-turn lane would degrade by less than four (4) seconds from Level of Service E to a Level of Service F and the southbound NYS Route 110 right-turn movement would degrade to a Level of Service B during the weekday morning peak hour. Although degradations would be present, the overall intersection would continue to operate at the No-Build Level of Service during both peak hours. Please note, the traffic volume attributable to the Canon development would account for less than 5% of the total intersection volume

**Comment 47:**

*Regarding the Synchro analysis for the intersection of the LIE South Service Road at Old Walt Whitman Road, the existing AM “As Counted” volumes from the July 17, 2008 submission have reduced in the August and October revisions. The July submission showed the southbound through volume as 615, which is lowered to 281 in the later revisions. The southbound left turn has been reduced from 85 to 48. Similarly, for the intersection of the LIE North Service Road at Old Walt Whitman Road, the existing AM “As Counted” volumes from the July 17, 2008 have reduced from 644 to 273 in the later revisions. The difference in volumes is a substantial change. The applicants’ engineers (Atlantic Traffic) should clarify this drop in numbers. We understand that there will be staggered work hours at the office, however, assumptions of drop in values need to be explained in more detail. (Letter from NYSDOT dated November 21, 2008)*

**Response:** During the preparation of the August 2008 version of the Traffic Impact Analysis (later revised and submitted as the October 2008 version), a volume balancing error was identified in the southbound approach volumes at the North and South Service Road intersections with Old Walt Whitman Road, as presented in the July version. This coding error was a result of the transfer of raw field data to the appropriate figures/diagrams within the Traffic Impact Analysis. The adjusted volumes are a reduction in the previously submitted report at certain southbound movements along Old Walt Whitman Road.

GPI had stated in its first review letter, dated July 10, 2008, that the overall volumes at these intersections were considerably higher than the GPI-calculated data used as a basis for comparison. During preparation of the later versions, the discrepancy was identified and corrected. GPI has since deemed the network traffic volumes

satisfactory based on these subsequent revisions. The tables shown below contain the traffic volume data collected at the subject intersections:

**Table 4-2 - LIE North Service Road & Old Walt Whitman Road Traffic Volume Data**

<b>Movement</b>	<b>2003 AM</b>	<b>2008 AM</b>
NB-L	268	220
NB-T	540	563
SB-T	267	273
SB-R	122	147
WB-L	36	56
WB-T	921	1,032
WB-R	94	128
<b>TOTAL</b>	<b>2,248</b>	<b>2,419</b>

**Table 4-3 - LIE South Service Road & Old Walt Whitman Road Traffic Volume Data**

<b>Movement</b>	<b>2003 AM</b>	<b>2008 AM</b>
NB-T	364	359
NB-R	53	50
SB-L	81	48
SB-T	222	281
EB-L	444	424
EB-T	1,471	1,452
EB-R	956	889
<b>TOTAL</b>	<b>3,591</b>	<b>3,503</b>

The tables demonstrate that the 2008 volumes are generally in keeping with the 2003 volumes. It is not uncommon in areas of constrained traffic flow during peak hours that traffic volumes fluctuate seasonally, monthly and annually. As the roadway network is saturated with volume during both peak hours, Atlantic Traffic & Design Engineers, Inc. maintains that the traffic volumes collected in 2008, seasonally adjusted by 6.5%, and appropriately grown to consider background traffic growth, have produced a conservative Traffic Impact Analysis. Please note, the peak period during which the discrepancy was identified is not the “critical” peak period driving the proposed mitigation. Therefore, the findings of the Traffic Impact Analysis and mitigation/improvement measures proposed remain valid.

**Comment 48:**

*We understand the explanation of an error in field data resulted in the difference of the existing volumes from the July 17, 2008 submission, causing the reduction in the August and October revisions. We are in agreement with the latest Traffic Study, and you should continue with preparing the request for Control of Access modification and appropriate documentation and access modification report. (Letter from NYSDOT dated December 19, 2008)*

**Response:** Due to NYSDOT's concurrence, no response is necessary at this time.

**Comment 49:**

*Please be advised GPI has completed its review of the traffic study documents and supplementary materials. You have addressed all of our comments and concerns to this point for this phase of the project. (Letter from GPI dated January 14, 2009)*

**Response:** Due to GPI's concurrence, no response is necessary at this time.

#### 4.6.2 Trip Reduction Initiatives – Carpool/Transit

**Comment 50:**

*The developer may want to consider providing preferential parking to carpoolers and motorcycles as both are likely considering the proximity to the HOV lanes. Motorcycles are allowed in the HOV lane during HOV restricted hours. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Reserved parking stalls will be provided for employees utilizing carpool, bicycle, and motorcycle means of arriving to and departing from the proposed Headquarters Complex

**Comment 51:**

*The Traffic Impact Analysis indicates that that there will be a shuttle connecting the complex to nearby train stations. The Developer should also consider a shuttle bus to the nearby bus stops as well. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Canon is committed to encouraging the use of public transportation to and from the office complex and as such will strongly consider providing a shuttle

bus to the nearby bus stations, in addition to its commitment to provide a shuttle to the nearby LIRR train station.

**Comment 52:**

*The Traffic Impact Analysis indicates that the Developer will provide for a bus stop for the LI Bus Route 95 in front of the site on southbound Walt Whitman Road. The MTA's website indicates that this bus travels northbound only at this location, rendering the bus stop unnecessary if the MTA's website is correct. Please clarify. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The Department is correct in noting that the MTA N95 bus line currently travels only in the northbound direction. Negotiations are currently underway with the MTA to determine how this bus line can be rerouted to accommodate the Canon development. The Applicant will continue to investigate this possibility and provide information to the NYSDOT with regard to any progress made.

**Comment 53:**

*The plans should include the addition of sidewalk and sidewalk ramps (in compliance with ADA standards) along Walt Whitman Road and the South Service Road. (Letter from NYSDOT dated October 24, 2008)*

**Response:** When final construction documents are prepared for the mitigation proposed along Old Walt Whitman Road and the South Service Road, the recommended pedestrian upgrades would be considered.

**Comment 54:**

*Will the railroad station shuttle be run only to Huntington Station? (Planning Board Hearing Minutes, page 22, October 1, 2008)*

**Response:** The implementation of specific Shuttle routes will depend upon need and convenience, that is, whichever station seems to best suit the employee base once the facility is active.

**Comment 55:**

*The report states a bus stop will be provided along the site's Walt Whitman frontage. The developer should provide a turn-out for buses on Walt Whitman so as not to*

*interrupt the flow of traffic along this heavily-traveled corridor, and any associated dedication that may be necessary for the turn-out. A shelter should also be provided to further encourage Canon employees' use of public transportation. (Letter from Town of Huntington Highway Office dated October 10, 2008)*

**Response:** The Site Plan prepared by Bohler Engineering provides for a bus turn-out along its frontage on Old Walt Whitman Road. The Canon Project Team is currently evaluating the need for a bus shelter at this location and will amend the plans accordingly when that determination is made. Once the site frontage elements are completely determined, the appropriate property dedications would be made to the Town of Huntington to ensure that the bus stop and bus turn-out lane are located on public property.

#### 4.6.3 On-Site Circulation

##### **Comment 56:**

*On-site circulation issues are significant as noted in GPI's July 10<sup>th</sup> letter:*

*A peak hour on-site traffic circulation plan is warranted showing the envisioned volumes entering and leaving the site during the peak hour and the roadways they will take and circulate on around the site to access the garages. It appears that all on-site traffic control will be via stop control - no traffic signals. I suggest that capacity analysis be done at the major intersections in the vicinity of the garages and main entry way to access the level of operations anticipated on-site.*

*Please provide the aforementioned information as requested. Safe and adequate vehicular and pedestrian movements around the site are a concern to the Town. (Letter from GPI dated October 07, 2008)*

**Response:** On-site distribution figures and analyses have been included in the revised Traffic Impact Analysis. Figures 24 through 27 in the Traffic Impact Analysis Technical Appendix depict the expected site generated traffic distribution and volumes at the site. HCS was utilized for the capacity analyses completed at the Main Access Aisle intersections with the Westerly North Parking Garage Driveway, Easterly North Parking Garage Driveway, and the Southerly Access Aisle. The HCS analysis results can be found in the Technical Appendix of the Traffic Impact Analysis. A capacity analysis for the Canon Main Site Driveway intersection with the Main Access Aisle has also been provided. However, as the intersection is stop-

controlled at three approaches and cannot be modeled accurately in HCS, the analysis was conducted utilizing Synchro. Please refer to the “Build” and “Build with Mitigation” Synchro files provided for each peak period as the aforementioned intersection was added into the roadway network. Level of Service and capacity analyses are also provided in the Traffic Impact Analysis. As shown, the internal unsignalized intersections would be expected to operate at acceptable Levels of Service during both peak hours analyzed.

**Comment 57:**

*The developer should consider extending the road leading along the southern edge of the site beyond the loading docks to access the road paralleling the South Service Road (avoid Phase II Office Building and adjust the North Parking Garages Phase I and Phase II to accommodate the new road). This will provide better circulation from entrance/egress points and the parking garages, especially if the traffic signal is moved to the southernmost driveway on Walt Whitman Road. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The Department’s recommendation above was considered very early on in the Site Plan development process. However, existing grades in that area limit the ability to construct additional on-site roadways in this area and based on our analysis of internal site circulation and capacity, the proposed on-site circulation plan would promote safe and efficient travel throughout the property limits.

**4.6.4 Site Access Management Plan**

**Comment 58:**

*The proposed access and egress points along Old Walt Whitman Road are unworkable. Traffic is currently backed up for blocks south of the proposed site. The addition of numerous left turns from the Canon site will worsen an already unacceptable situation. (Form Letters 1 through 6)*

**Response:** Industry-standard site access management techniques indicate that the use of multiple (primary and secondary) access points is beneficial not only to the development itself, but also to the surrounding roadway network. Multiple access points allow site traffic to be distributed more evenly than it would be with a single access point. For example, providing only one access point along Old Walt Whitman Road would require that the traffic signal proposed as part of the Canon

project be timed in such a way to allow a much greater portion of green time to Canon's exiting traffic to be processed effectively. This would in turn increase delay experienced by mainline (Old Walt Whitman Road) traffic. Providing multiple access points lessens the burden of traffic at any given access point, and distributes it more evenly within the roadway network. Capacity improvements along Old Walt Whitman Road have been previously proposed by the Town and based on the results of the Traffic Impact Analysis to more effectively process traffic volume in the northbound and southbound directions during peak periods.

**Comment 59:**

*Traffic is currently backed up on South Service Road during the evening rush hour, yet the Canon plan proposes an egress along this congested roadway. (Form Letters 1 through 6)*

**Response:** The mitigation package identified by ATDE in the Traffic Impact Analysis prepared for the Canon development project outlines a specific mitigation measure for the South Service Road. The mitigation measure involves the addition of a through-travel lane beginning along Canon's frontage and extending to NYS Route 110. It is the intent of this mitigation measure to relieve traffic congestion along this stretch of roadway and improve traffic progression. It is important to note that NYSDOT's improvement project along NYS Route 110 may involve signal timing improvements at the North and South Service Road intersections. These efforts may also improve mobility in the area.

**Comment 60:**

*The report recommends a coordinated traffic signal network for the signals south of the LIE, including the proposed Canon access. Since a signalized access on Walt Whitman Road is critical to ingress/egress to the Canon property, and their proposed signal must be placed in system with the nearby existing signals on Walt Whitman, it is reasonable to expect the applicant to implement this improvement as part of their traffic mitigation. (Letter from Town of Huntington Highway Office dated October 10, 2008)*

**Response:** The Traffic Impact Analysis that has been prepared for the Canon Americas Headquarters application recommends a coordinated traffic signal network along Old Walt Whitman Road, beginning at the Canon main site driveway and extending southerly toward and including Park Drive. Comments from the

NYSDOT in their October 23, 2008 correspondence recommended that the proposed signal at Canon's main site driveway be also coordinated with the existing traffic signal at the South Service Road. The current version of the Traffic Impact Analysis considers this suggestion and presents a coordinated traffic signal system inclusive of the South Service Road, as well as the four (4) signals along Old Walt Whitman Road. This improvement, similar to the other improvements identified in the Traffic Impact Analysis, is subject to the funding measures previously mentioned, in addition to the timing of the Town's Old Walt Whitman Road improvement project.

**Comment 61:**

*A high volume of traffic will desire to exit the site at the southernmost driveway on Walt Whitman Road from the south parking garage. There may be a need for a traffic signal there or to move the traffic signal, currently proposed at the middle driveway to the southern driveway. This is especially important because it is the only signalized egress point from the site. The Town may want to explore this. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The Trip Distribution and assignment patterns that we have developed and calibrated for the Canon development, as well as the subsequent Highway Capacity Analyses have demonstrated that the proposed southerly driveway for Canon along Old Whitman Road will operate at acceptable Levels of Service during the peak hours. We do not believe that the traffic expected to utilize that driveway will warrant a traffic signal, particularly since a traffic signal is proposed immediately north. We anticipate that any traffic originating from the southerly parking garage destined north of the site would travel through the primary site access point, the proposed traffic signal. Due to the fact that the exiting movements at the southerly driveway will be largely composed of right-turn movements destined southbound, we do not anticipate the need for additional control above and beyond adequate signage and pavement markings.

**Comment 62:**

*The currently proposed location for the traffic signal at the middle driveway may cause internal circulation problems. This signal's green time will be controlled by the signal at the LIE South Service Road and will be biased toward South Service Road traffic and not Walt Whitman Road traffic: and cars will consequently be*

*backed up on site. There may be spill over problems on northbound Walt Whitman Road. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The “Build with Mitigation” Synchro analyses have been modeled such that the Canon Main Site Driveway/Old Walt Whitman Road intersection runs at the same cycle length as the LIE South Service Road/Old Walt Whitman Road intersection during each study peak hour. The offset at the site driveway intersection was also calibrated with respect to the LIE South Service Road/Old Walt Whitman Road intersection in order to produce minimal delay and queuing along northbound Old Walt Whitman Road. The results of these analyses indicate that the on-site intersection of the Canon Main Site Driveway and Main Access Aisle, located adjacent to the intersection of Canon Main Site Driveway/Old Walt Whitman Road would operate at an ICU Level of Service “A” during the morning peak hour and an ICU Level of Service “B” during the evening peak hour.

**Comment 63:**

*For example, the proposed CANON-provided mitigation on the South Service Road calls for the addition of entrance and egress points (driveways) to the CANON site. It is often difficult to obtain NYSDOT approval for these types of additions since the NYSDOT seeks to control all access and egress points to and from its state roads (like the LIE Service Road) to assure adequate safety. Confirmation must be obtained from NYSDOT that they will allow all of the described improvements to the South Service Road, east and west of the Walt Whitman Road intersection. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** Atlantic Traffic & Design Engineers has met and coordinated with NYSDOT on numerous occasions to discuss the proposed access along the South Service Road and to discuss the stipulations of the Highway Work Permit that must be issued for construction to begin within the State right-of-way. The last revised Traffic Impact Analysis is currently under review by the Department of Transportation and our office will continue to coordinate with NYSDOT until the Highway Work Permit has been issued. Based on continued discussions and consultations with the Town of Huntington and the NYSDOT, the widening improvements along the North and South Service Road will be the subject of an Infrastructure Improvement Plan that will detail the source of funding and the timing of construction. Final site plan approval shall be subject to the acceptance of this Plan.

**Comment 64:**

*There is no clearance as of yet the New York State Department of Transportation (NYSDOT) regarding site access and proposed improvements. (Planning Board Hearing Minutes, pages 13-15, October 1, 2008)*

**Response:** The proposed modifications are currently under review. With regard to site access, there are five access points to the site in total. The westernmost access point, located along the Long Island Expressway Service Road, is an inbound driveway only. Just east of that would be an egress only driveway along the South Service Road. Both of these access points are upstream of the off ramp (Exit 49S) of the expressway, allow right-turn movements only and are unsignalized. Along Old Walt Whitman Road, there are three primary access points. The northernmost access point is an inbound driveway only. A centrally-located access point is proposed that would be signalized, providing full movement into and out of the site. Just south of the central access point would be an unsignalized access point, providing access for both employees and delivery vehicles.

**Comment 65:**

*Real Estate is currently circulating a request regarding modification of the control of access limits for the two (2) proposed curb cuts that are currently within a controlled access area. The developer will be required to prepare any documentation and analyses necessary to justify the change in control of access. (Letter from NYSDOT dated October 24, 2008)*

*Considerable time may be needed to seek FHWA approvals. If fully approved, an agreement outlining the limits of each release will be prepared. Following the execution of the agreement, a corresponding legal instrument will be prepared. Future plans should show the existing limits of the control of access. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Our coordination with the NYSDOT has indicated that should FHWA involvement be necessary, the Department will resolve as required. We understand that the control of access along the South Service Road would be modified to accommodate Canon's proposed driveway at the northwest corner of the site.

**Comment 66:**

*We have contacted the FHWA to see if they would be in support of the proposal to modify the Control of Access along the south service road and it appears that they will not object to it. Canon's conceptual access plan was provided to the FHWA showing the adjusting of the control of access on the south service road of the LIE as it approaches Walt Whitman Road. FHWA's response was that the concept looks to provide a better weave and appears to operate safer. FHWA expects the request and appropriate documentation to be prepared as outlined in Appendix 8 of the Project Development Manual (PDM) which would include the necessary coordination with NYSDOT main office Design and Real Estate offices. A NEPA checklist will be needed with the request. The request for Control of Access modification and appropriate documentation and access modification report should be prepared by the developer's consultants. (Letter from NYSDOT dated November 21, 2008)*

**Response:** Atlantic Traffic & Design Engineers, Inc. is currently in the process of coordinating and preparing the technical documentation required to shift the Control of Access along the LIE South Service Road based on the protocol identified in NYSDOT's letter and will forward the documentation to the NYSDOT for review and approval upon completion.

**4.6.5 Off-Site Roadway Improvement Measures****Comment 67:**

*Widening the bridge across the Long Island Expressway is likely a complicated and expensive project. Has the idea of a second bridge – which might be cheaper and easier to construct than widening the existing bridge – ever been considered or discussed? (Planning Board Hearing Minutes, pages 45-46, October 1, 2008)*

**Response:** There have been no discussions specifically as to a second bridge and Canon is not introducing that at this time.

**Comment 68:**

*The bridge over the Long Island Expressway at Old Walt Whitman Road and South Service Road is unable to accommodate current volume of traffic. It should be widened to two lanes in both directions (Form Letters 1, 2, 3, 5 and 6)*

**Response:** The Canon development team understands that the existing bridge spanning the Long Island Expressway is constrained in that it only provides one vehicular travel lane in each direction. ATDE has recommended mitigation elements at the adjacent signalized intersections in an attempt to improve operating conditions and capacity at all times, particularly when needed the most during the peak hours. We understand that this bridge is also the subject of Federal, State, and County interests, and the applicant understands that these parties are working aggressively to identify funds for future bridge improvements.

**Comment 69:** *The bridge is another issue that must be addressed. It must be widened since one truck on the bridge causes severe backups at the traffic signal. It can take several light changes to get through the intersection at South Service Road and Old Walt Whitman Road. (Planning Board Hearing Minutes, page 37, October 1, 2008)*

**Response:** ATDE, GPI and the NYSDOT concur that the proposed mitigation contained within the Traffic Impact Analysis would be adequate to address the project's traffic impacts. Please note, the mitigation proposed does not include a new bridge structure but does consider pavement restriping and approach improvements to add capacity at the signalized intersections.

**Comment 70:**

*Additionally, the applicant's plans do not indicate how they will transition into the travel lanes on the LIE overpass. The applicant should submit detailed pavement marking plans that extend north past the LIE North Service Road. This will enable us to ensure that there are no potential lane configuration conflicts both north and south of the Canon site. (Letter from Town of Huntington Department of Transportation and Traffic Safety dated September 8, 2008)*

**Response:** Sheet 3 of 7 of the Conceptual Roadway Improvement Plans contained within the Technical Appendix depicts the proposed pavement marking improvements north and south of the Old Walt Whitman Road overpass of the Long Island Expressway. Please note, detailed Roadway Construction Plans including signage and pavement markings will be prepared prior to construction of the associated improvements.

**Comment 71:**

*The traffic mitigation that is necessary before the CANON property is permitted to be occupied consists of the mitigation that is identified in DEIS, and the addition of traffic lanes (i) on the eastbound South Service Road for the entire length of the road from west of the CANON site to NYS Route 110; (ii) southbound on the west side of Walt Whitman Road, at least from the southern end of the CANON site to the intersection to the South Service Road. Again, it is LBA's strong position that (with the possible exception noted herein of the widening of the Walt Whitman Road overpass bridge) all such mitigation must be completed prior to the issuance of certificates of occupancy and actual occupancy of the site.*

*Much discussion has taken place about the need to widen the Walt Whitman Road overpass bridge. Most, if not all, stakeholders agree that the bridge needs to be expanded to create more capacity. However, CANON disputes that this mitigation should be done prior to the opening of its headquarters. CANON's traffic consultant has suggested that re-striping of the lanes over the bridge could increase, on a temporary basis, the bridge's capacity and throughput. While this would need to be confirmed (and the DEIS should be required to analyze this suggestion), this would merely be a very short-term solution to the long-term problem regarding the insufficiency of the overpass bridge. The bridge would need to be widened in the near term, and it would be irresponsible for the Town, State and County not to recognize and provide for this necessary infrastructure upgrade.*

*The main issue relating to the bridge appears to be what party(ies) should bear the expense of this widening. LBA obviously believes that this infrastructure improvement is a governmental responsibility. Accordingly, LBA believes that the Town, State and County must collaborate to find that necessary funding for this project, including seeking federal highway funds. It is imperative that the bridge be widened in the foreseeable future. (Letter from LBA Melville Associates LP dated October 13, 2008)*

**Response:** ATDE has recommended mitigation elements at the signalized intersections adjacent to the bridge structure in an attempt to improve operating conditions during the peak hours. We understand that this bridge is also the subject of Federal, State, and County interests, and the applicant understands that these parties are working aggressively to identify funds for future bridge improvements/replacement. Based on the findings of the Traffic Impact Analysis,

replacement of the bridge structure would not be necessary to effectively accommodate ingress and egress traffic to and from the site.

**Comment 72:**

*The biggest and most costly issue that has not been addressed concerns itself with the Walt Whitman Road Bridge over the LIE. This narrow structure is envisioned to be restriped to accommodate 3 - 10 ft lanes over the bridge under the Town's project. This structure is currently 2 lanes over the LIE and widens out to two approach lanes and one receiving lane on the approaches to the LIE service roads. To maximize every inch of pavement on the structure, the Town's Walt Whitman Road plans called for utilizing the existing shoulder areas to provide three narrow lanes on the bridge structure itself (2 northbound, 1 southbound) and widening at North Service Road approach to accommodate an additional through lane. While the short storage lengths provided on the bridge for vehicles to access and store in advance of the service road approaches may not be fully sufficient for proper utilization and efficient vehicular flow, the Town's project simply attempted to gain whatever additional capacity could be attained without reconstructing the bridge. In its study, Canon's traffic consultants reconfigured the southbound approach to the South Service Road in a similar fashion.*

*Despite our reservations about the adequacy of the bridge's roadway and the very short storage lane lengths, the study appears to indicate that adequate levels of service can be achieved. Notwithstanding comments found later in this document which calls for ATDE to review the timing data utilized, the expected queuing and poor levels of service do not materialize. It appears the additional third lane on the LIE Service Roads required as project mitigation, plus the additional WB left turn lane proposed and lane assignment revisions permit a change in the signal timing to more favor Walt Whitman Road, thereby processing more traffic over the structure. Further in-depth study and coordination with the DOT is warranted on this critical infrastructure link but an immediate decision regarding its reconstruction may not necessarily need to hold up necessary project approvals provided the other mitigation measures are accepted. It appears that based upon the applicant's traffic study the above listed roadway mitigation is required to address project impacts and as such, once the final comments are addressed and funding and responsibility issues are finalized, the project is viable from a traffic standpoint. (Letter from GPI dated October 07, 2008)*

**Response:** ATDE concurs that the project is viable from a traffic standpoint without the construction of a new bridge structure presuming all roadway mitigation contained within the Traffic Impact Analysis are addressed.

**Comment 73:**

*What are the plans and mitigation measures to improve the flow along Old Walt Whitman Road and South Service Road and at their intersection? (Planning Board Hearing Minutes, page 17-18, October 1, 2008)*

**Response:** In general, mitigation along both roadways would comprise additional capacity by widening South Service Road and Old Walt Whitman Road along the site frontages. Pavement marking modifications will be made to add more capacity, changing the one-lane approach to a two-lane approach. There is a proposal to add an eastbound travel lane at the intersection of South Service Road and Old Walt Whitman Road (Rte 110).

**Comment 74:**

*With respect to the mitigation proposed to be performed by CANON to the frontage of its property along Walt Whitman Road, the DEIS provides for, among other things, a second southbound lane on the west side of Walt Whitman Road buy way of a property dedication along the CANON frontage. It does not appear to provide for any extension of that southbound lane south of the CANON property (possibly all the way from the CANON site south to Walt Whitman Road's convergence with Route 110), which omission vastly limits the utility of that improvement. The balance of the mitigation to be performed by CANON appears to be limited to signalization of the intersection to be created at the main CANON entrance and additional driveways and intersection into the property further south. The CANON-performed mitigation is extremely limited. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** The comment issued by LBA Melville Associates LP is not based on a Traffic Engineering Capacity Analysis of southbound Old Walt Whitman Road. ATDE maintains the capacity analysis methodology and results as well as the proposed mitigation measures.

**Comment 75:**

*The applicant's traffic report includes some traffic mitigation measures that consist of nothing more than signal timing adjustments. The report specifically references all the existing Walt Whitman Road signals from Sweet Hollow Road/Pinelawn Road to Route 110/Duryea Road. We do not believe that simple timing modifications will improve conditions to the extent this project requires. The existing town maintained signals currently operate independently of each other. The installation of the proposed signal at the Canon Walt Whitman Road north motoring public with significant reduction in vehicular delays. In as much as the applicant's traffic report concluded that all existing Walt Whitman Road traffic signals would require timing adjustments, a coordinated signal system should be considered along the entire length of the roadway. (Letter from Town of Huntington Department of Transportation and Traffic Safety dated September 8, 2008)*

**Response:** Based on the 2007 National Traffic Signal Report Card published by the National Transportation Operations Coalition, which is comprised of transportation experts including the Institute of Transportation Engineers (ITE) and the American Association of State Highway and Transportation Officials (AASHTO), our office continues to maintain that signal timing modifications are appropriate and effective mitigative measures to alleviate delay which occurs as a result of changes to site

specific traffic demand. As discussed within the Report Card, small changes can help increase the effectiveness of traffic signal operations and ultimately can reduce delay to travelers. The study indicates that traffic signal timing is rarely reviewed, resulting in outdated timing patterns that do not reflect current traffic needs. As requested by the Town during the August 8, 2008 project meeting, our office has proposed a preliminary coordinated traffic signal schedule along Old Walt Whitman Road which includes the signalized intersections of Park Drive, Baylis Road/Northgate Circle, Pineridge Street, and the proposed main driveway serving the Canon campus. A detailed discussion of our findings is provided on Pages 36 to 37 of the Traffic Impact Analysis, dated August 27, 2008, and pages 37 to 38 of the newly revised Traffic Impact Analysis, which was incorporated into the Draft Environmental Impact Statement. The recommended coordinated traffic signal system does not include the intersection of NYS Route 110 and Old Walt Whitman Road/Duryea Road, as this signal is under the jurisdiction of the NYSDOT. A coordinated signal system can be accomplished through field changes to the existing

signal controllers from a common frame of reference at each traffic signal using the detailed coordinated schedule provided with the Traffic Impact Analysis.

**Comment 76:**

*It is recommended that the proposed signalized main entrance at Old Walt Whitman Road be interconnected to the LIE South Service Road at Old Walt Whitman Road NYS No. 748. (Letter from NYSDOT dated October 24, 2008)*

**Response:** As per your recommendation, the Traffic Impact Analysis, last revised October 27, 2008, presents a coordinated traffic signal network along Old Walt Whitman Road that includes the existing NYSDOT traffic signal at Old Walt Whitman Road and LIE South Service Road. This coordinated system involves operating the same cycle lengths from the Old Walt Whitman Road and North Service Road intersection southerly toward and including Park Drive.

**Comment 77:**

*The applicant's site plan also shows their proposal to reconfigure the Walt Whitman Road lane designations. The town's Walt Whitman Road reconstruction project design will provide a curb to curb pavement width of 42 feet. This will be used to establish a 12 foot travel lane for both northbound and southbound traffic; a 10 foot center two way left turn lane and two shoulders that each measure 4 feet. The applicant's site plan shows one northbound, two southbound lanes and a center two way left turn lane. Their plan does not include shoulders and will utilize 52 feet of curb-to-curb pavement width that will be widened to accommodate southbound right turn lanes at the Canon access driveways. The plans do not show how the applicant's lane configuration and lane designation will transition into the town's 42 foot pavement width south of the site. Please note that immediately south of the Canon site there is a southbound right turn lane providing access to Millennium Hills. Therefore the applicant must produce a pavement marking and signage details outlining how southbound traffic will merge into one lane. The applicant's plans must therefore extend south to the Millennium Hills. (Letter from Town of Huntington Department of Transportation and Traffic Safety dated September 8, 2008)*

**Response:** As requested during the August 8, 2008 meeting with associates from your office and representatives from the New York State Department of Transportation (NYSDOT), Conceptual Roadway Design Plans were prepared by

our firm and included in our August 27, 2008 Traffic Impact Analysis, which was incorporated into the Draft Environmental Impact Statement submitted to the Town by Cameron Engineering Associates. The conceptual improvements pertaining to the area in question along southbound Old Walt Whitman Road are depicted on Sheets 3 and 4 of 7 of the Conceptual Roadway Improvement Plans contained within the Technical Appendix. Sheet 4 of 7 specifically shows the roadway transition and pavement markings at the Millenium Hills frontage. Please note, detailed Roadway Construction Plans including signage and pavement markings will be prepared prior to construction of the associated improvements.

**Comment 78:**

*Discuss the widening of Old Walt Whitman Road and the use of turning lanes. (Planning Board Hearing Minutes, pages 15-17, October 1, 2008)*

**Response:** There is a proposal to widen Old Walt Whitman Road along the proposed Canon frontage. In the southbound direction, there would be right-turn bays provided into the inbound lane of the northernmost driveway, the central signalized access point and the southernmost access point. The southbound turning lanes would not run the entire length of the property. The lanes would be striped to channel vehicles into the through lane and, at a certain point, direct them into the site. These roadway plans are under development at this time and have not been finalized. In the northbound direction, left turn bays would be provided for both access points, i.e., the central and southern ones.

**Comment 79:**

*According to the site plan, is there enough space along the site frontage to accommodate future expansion of the roadway? (Planning Board Hearing Minutes, pages 19-22, October 1, 2008)*

**Response:** Yes. Once construction documents have been prepared, the requisite right-of-way dedication maps will be prepared for Town submittal to memorialize any necessary dedications.

**Comment 80:** *Residents complained about Old Walt Whitman Road previously. Engineers studied the problem, the Town held meetings, and improvements were promised, but never implemented. (Planning Board Hearing Minutes, page 36, October 1, 2008)*

**Response:** It is our understanding that the Town of Huntington has designed and plans to implement various improvement measures along Old Walt Whitman Road independent of the Canon project.

**Comment 81:**

*Trucks park illegally at the roadside deli vans along Old Walt Whitman Road. These trucks limit site lines and create a safety hazard. (Form Letters 2, 3 and 5.)*

*Cars and trucks on Old Walt Whitman Road travel in excess of the posted speed limit and travel on the shoulder of the road. Trucks constantly violate the restriction which prohibits them from using the road between the hours of 7:00 pm and 6:00 am. (Form Letter 3)*

**Response:** The Canon development team recognizes that both passenger vehicles and trucks may travel at speeds greater than the speed limit along Old Walt Whitman Road, however it is important to note that such existing conditions would be most appropriately mitigated through the use of police enforcement. The existing truck curfew (7:00 p.m. to 6:00 a.m.) is signed on both Old Walt Whitman Road and the Long Island Expressway South Service Road, and it is the Police Department's responsibility to enforce these truck restrictions. Canon's overall plan will not add a significant amount of truck traffic to Old Walt Whitman Road, and it is the intent of Canon to adhere to all existing truck restrictions along this roadway.

**Comment 82:**

*The physical condition of Old Walt Whitman Road is horrendous and is deteriorating rapidly owing to the high volumes of cars and trucks. Repairs were promised years ago but have never been implemented. (Form Letters 1, 2, 3, 5 and 6)*

**Response:** The Town of Huntington's Master Improvement Plan for Old Walt Whitman Road will upgrade the entire pavement surface from curb to curb, and eliminate numerous cracks and potholes between Old Country Road and NYS Route 110.

**Comment 83:**

*Please explain in detail the impacts associated with the building across the street from Canon that includes the Fed Ex tenant. It states in the study that the current development proposal a driveway would have to be reconfigured. As this is an*

*impact an on another site some further discussion and justification is warranted. Also, while the conceptual plans that have now been produced are much better, there is still difficulty to completely ascertain site impacts to the condominium development immediately to the south of Canon and the resulting roadway widening transition that may be necessary on that site's frontage. Again, please provide a description of the current design issues for the transition and whether any property is being taken or curb realignment work results. (Letter from GPI dated October 07, 2008)*

**Response:** The main access point for Canon would be signalized and aligned with the southerly driveway for the FedEx complex across the street, providing a benefit to FedEx's employees and customers. We expect minor geometric improvements would be necessary to achieve the desired alignment and signal pole location. It is our understanding that those conceptual geometric modifications have been depicted on the last revised Site Plan prepared by Bohler Engineering.

The intent of the frontage widening along southbound Old Walt Whitman Road is to provide additional capacity for both Canon employees/visitors and the traveling public. The preliminary design would transition the new southbound through lane into the widened shoulder area, which functions as an exclusive right-turn lane serving the Millennium Hills complex. Similar to typical lane transitions, this design would provide the appropriate MUTCD pavement markings and signage. Based on the conceptual plans, no property is proposed to be taken to accomplish this transition. We expect that the majority of motorists using the additional lane would be either associated with Canon or residents of the complex.

**Comment 84:** *Old Walt Whitman Road currently sustains heavy traffic in the morning and evening. Once the Canon buildings are erected, traffic congestion will be exacerbated, despite the additional lane that will serve Canon. (Planning Board Hearing Minutes, pages 35-36, October 1, 2008)*

**Response:** Based on the results of the Traffic Impact Analysis and the mitigation program identified which considers a number of improvement measures along with the additional lane along Old Walt Whitman Road, the adjacent roadway network would effectively accommodate the traffic volume associated with the Canon project.

**Comment 85:**

*Despite the traffic study and traffic mitigation plans, there will remain a traffic issue beyond Canon's property. Traffic is frequently gridlocked under current conditions on Old Walt Whitman Road. Moreover, there is no plan to widen this route beyond Canon's property line. Many southbound vehicles on Old Walt Whitman Road also make left turns onto Baylis causing unsafe conditions on this narrow section of the road. Additional trips from the proposed project will worsen this situation. (Planning Board Hearing Minutes, pages 40-42, October 1, 2008)*

**Response:** It is our understanding that based on the Town's proposed improvements along Old Walt Whitman Road, an exclusive left turn bay would be provided to better accommodate left turning traffic along Old Walt Whitman Road. Additionally, the Canon project would be expected to have minimal impact on this turning movement based on the analysis results.

**Comment 86:**

*Traffic congestion on Old Walt Whitman Road is severe during morning and evening rush hours. Traffic conditions will be further exacerbated by the addition of trips generated by the Canon site, especially if these impacts are not properly mitigated. (Form Letters 1 through 6)*

**Response:** The Canon development team is very cognizant of the existing traffic conditions and roadway congestion that persist during the weekday peak hours in the Melville area. The Traffic Impact Analysis prepared for the Canon development provides an extensive mitigation package, which ATDE has presented to the Town of Huntington and the NYSDOT. At this time, all involved entities are working together in an attempt to fashion sources of funds to implement the mitigation measures outlined in the report ATDE has prepared. The intent of the mitigation is to improve traffic conditions not only along Old Walt Whitman Road, but along the North and South Service Roads as well. Also, the NYSDOT's proposed improvements will improve mobility along NYS Route 110.

**Comment 87:**

*We residents – located off of Old Walt Whitman Road – often wait 15 minutes to get through the intersection at Old Walt Whitman Road and South Service Road. With*

*the addition of new vehicle trips from the Canon site, our wait times will significantly increase. (Form Letters 1, 2, 3, 5 and 6)*

**Response:** The results of the Traffic Impact Analysis have not indicated this level of delay at the Old Walt Whitman Road/South Service Road intersection and the methodology has been approved and agreed upon by the NYSDOT and the Town of Huntington. Based on the proposed improvement measures, it is expected that motorists would benefit from the proposed capacity improvements

**Comment 88:**

*Walt Whitman Road @ Sweet Hollow/Pinelawn Road: We do not envision any significant impacts at this intersection due to the proposed project. However, proposed lane configuration and signal timings should be corrected to reflect the Town of Huntington plans. (Letter from GPI dated October 07, 2008)*

**Response:** The proposed lane configurations and signal timings at this intersection have been modified to be consistent with the official Town of Huntington roadway improvement plans and signal timing plans, respectively.

**Comment 89:**

*Walt Whitman Road @ Old Country Road: This newly proposed signalized intersection by the NYSDOT would operate under close signal coordination with the adjacent NYS Route 110 @ Old Country Road signalized intersection. The proposed signal timings recommended by the applicant at this intersection are not consistent with the adjacent NYS Route 110 @ Old Country Road signal timings during peak hours. They should be analyzed as coordinated signals utilizing same cycle lengths. Additionally, the intersection geometry utilized in the analysis is not consistent to that proposed by the NYSDOT. (Letter from GPI dated October 07, 2008)*

**Response:** The intersection geometry utilized in the “no-build” and “build” analysis has been modified to be consistent with the proposed NYSDOT and Town of Huntington improvements. It is acknowledged that the proposed traffic signal would operate under close signal coordination with the adjacent NYS Route 110 and Old Country Road signalized intersection. Therefore, the presented signal timings in the “no-build” and “build” analyses contain cycle lengths and phasings consistent with the NYS Route 110 and Old Country Road signal.

**Comment 90:**

*Walt Whitman Road @ LIE North Service Road: Due to the assumption noted in page 32 of the traffic study "it is reasonable to assume that the improvement could be extended west to the Old Walt Whitman Road intersection as well", the proposed traffic analysis shows better results. As discussed earlier, under the 2010 Build with DOT improvement analysis at LIE North Service Road and Old Walt Whitman Road has one (1) exclusive left turn lane, three (3) through lanes and one (1) exclusive right turn lane on WB approach. Three through lanes are carried forward to west of Old Walt Whitman Road (see Photo 1). While Town of Huntington improvements show one (1) left and through shared lane, one (1) through lane and one (1) exclusive right turn lane on WB approach and it shows two (2) lanes west of Old Walt Whitman Road. No other improvements are proposed by NYSDOT at this intersection. Thus, the assumed additional lanes and turn bays in the analysis by the applicant are resulting in better traffic operating conditions than anticipated at this intersection. In reality, the results would show different operating conditions that may warrant additional mitigation.*

*At this time, Canon has not taken responsibility for this mitigation. We would like to know if the applicant is willing to add the lanes/turn bays as suggested in the analysis as it is not proposed either by the Town of Huntington or NYSDOT for their respective projects. (Letter from GPI dated October 07, 2008)*

**Response:** Although an exclusive left turn bay was preliminarily considered as a potential capacity improvement, the westbound approach to the intersection has been modified to consist of one shared left-turn/through lane, two through lanes, and one channelized right-turn lane. Based on consultations with the NYSDOT, further investigation of the existing right-of-way and the results of the intersection capacity analysis, the potential left turn bay has been removed. The Canon development team, along with the Town of Huntington and the NYSDOT, are working aggressively and are committed to identify sources of funding for the mitigation measures outlined in the Traffic Impact Analysis. Based on continued discussions and consultations with the Town of Huntington and the NYSDOT, the widening improvements along the North and South Service Road will be the subject of an Infrastructure Improvement Plan that will detail the source of funding and the timing of construction. Final site plan approval shall be subject to the acceptance of this Plan. Furthermore, the Applicant will provide a \$1.3 million Development Impact Fee to the Town for economic development programming, transportation

infrastructure in the Melville area and traffic improvements along the Walt Whitman Road corridor benefitting the existing travel public as well as Canon's site generated traffic.

**Comment 91:**

*As noted in the traffic study, the inclusion of another signal (Canon's Main Entrance) on Walt Whitman Road south of the LIE but north of Rt. 110 would result in 4 signals along that stretch. The additional signal and resulting significant increase in traffic by Canon necessitates that these signals be set up in an integrated coordinated system. While all the signalized intersections would receive new controllers that are likely to be able to accommodate interconnection the physical hard-wire connection must be installed. This is another mitigation that Canon needs to consider as part of its project. (Letter from GPI dated October 07, 2008)*

**Response:** ATDE agrees that coordination between the existing signals on Old Walt Whitman Road and the proposed traffic signal at the site driveway should be present to encourage favorable progression along the roadway. Our office has proposed a preliminary coordinated traffic signal schedule along Old Walt Whitman Road which includes the signalized intersections of Park Drive, Baylis Road/Northgate Circle, Pineridge Street, and the proposed main driveway serving the Canon campus. A detailed discussion of our findings is provided on Pages 36 to 37 of the Traffic Impact Analysis, last revised August 27, 2008, which was incorporated into the Draft Environmental Impact Statement. Additionally, this revised commentary is included on pages 36 through 38 of the October 27, 2008 Traffic Impact Analysis. The recommended coordinated traffic signal system does not include the intersection of NYS Route 110 and Old Walt Whitman Road/Duryea Road, as this signal is under the jurisdiction of the NYSDOT. A coordinated signal system can be accomplished through field changes to the existing signal controllers from a common frame of reference at each traffic signal using the detailed coordinated schedule provided with the Traffic Impact Analysis.

**Comment 92:**

*Where acceleration/deceleration lanes are proposed, corresponding property dedications must be considered to allow for a utility strip of 13 foot width between the relocated face of curb and the (new) highway boundary. Please advise if any*

*land donations are associated with this project. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Following identification of the funding sources and mechanisms for the mitigation measures identified in the Traffic Impact Analysis, formal design plans would likely be prepared to depict any property dedications required. It is likely that a property dedication be required along the LIE South Service Road to accommodate the additional lane in the eastbound direction. The property dedications would accommodate a standard 13' cross section based on NYSDOT requirements.

**Comment 93:**

*The Traffic Impact Analysis discusses a five (5) lanes westbound approach on the LIE North Service Road. Can this be built within the existing right-of-way (ROW)? The widening of the service roads towards the main line of the LIE will not be allowed as the clear distance to the DOT maintenance residency will be impacted. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The widening of the North Service Road would require additional right-of-way along the northbound side of the roadway based on the conceptual roadway plans prepared at this time. As such, the proposed widening would not impact the DOT maintenance residency. Please see the attached conceptual plan within the Technical Appendix.

**Comment 94:**

*Walt Whitman Road and North Service Road/South Service Road: The mitigation proposed on this State maintained signal calls for a 90 sec cycle length for the PM peak during the build conditions, compared to the existing 115 second existing cycle length. Similarly, the proposed mitigation proposes a 100 sec cycle length for the AM peak during the build conditions, compared to the existing 80 second existing cycle length. We understand that the proposed adjustments are an attempt to mitigate the queuing associated with the project generated traffic on the bridge. However, cycle lengths and their associated signal phasing changes have to be approved by the State as these are State maintained signals which are coordinated with other adjacent service road signals. Thus, any State approved changes that may not impact the Town's Walt Whitman Road would be acceptable. No further information is requested at this time. (Letter from GPI dated December 10, 2008)*

**Response:** Due to GPI's concurrence, no additional information is needed at this time.

**Comment 95:**

*As per our discussions with Atlantic Traffic & Design Engineers, the sketch plan presented on Sheet 4 of 7 of the traffic study has been revised. As previously depicted, the use of the current exclusive right turn into Paumonauk Hills residential development as also a lane drop for the second southbound through lane was not acceptable. The new configuration provided by ATDE would be able to provide a maximum transition of about 360' between the Canon's Main Entrance/Exit intersection and the project's south Entrance/Exit in order to accommodate reasonably safe distance for merging traffic from two thru lane to one thru lane on Whitman Road. This transition is adequate for vehicles that are traveling at a speed of 40 mph or less. The revised geometrical scheme allows the southbound exclusive right turn lane on Whitman Road leading to Paumonauk Hills Court to be maintained. This newly proposed plan has reduced the number of southbound through lanes on Whitman Road from two to one. As a result, the project's south Entrance/Exit driveway could result in adverse capacity constraints on eastbound exiting traffic however, as traffic would queue on-site this is a Canon matter. Exact design details would be worked out during the design approval process but consider this comment adequately addressed at this time. (Letter from GPI dated December 10, 2008)*

**Response:** Due to GPI's concurrence at this time, no further response is needed.

#### 4.6.6 Area-Wide Roadway Infrastructure Funding/Schedule

**Comment 96:**

Walt Whitman Frontage Roads Between LIE South Service Road and South Cannon Drive: The proposed traffic roadway network includes one additional southbound travel lane on Walt Whitman Road but this appears to be identified as an unfunded mitigation. This segment of roadway is anticipated to get about 514 project generated vehicles during the AM peak (a 44% increase in the no-build 2010 traffic volume) in the southbound direction and about 130 vehicles in the northbound direction (a 30% increase in the no-build 2010 traffic volume). This same segment will get about 180 project generated vehicles during the PM peak in the southbound direction (a 21% increase in the no-build 2010 traffic volume) and about 536

vehicles in the northbound direction (a 86% increase in the no-build 2010 traffic volume). With a background growth rate of 1% per year, the above noted 44% increase would take about PI years to generate this amount of traffic on the southbound frontage segment of Walt Whitman Road. Thus, it seems reasonable and logical for Canon to be responsible for the inclusion of this one additional southbound travel lane as a mitigation measure on Walt Whitman Road. (Letter from GPI dated October 07, 2008)

We recommend that at locations where assumptions are made in the analysis to add lanes on the North and South LIE Service Roads and Walt Whitman Road which are not being constructed or proposed either by the NYSDOT or the Town of Huntington, applicant should be fully responsible for these improvements. Again, this and other mitigation is still subject to receiving revised capacity analyses that address the comments herein. (Letter from GPI dated October 07, 2008)

**Response:** Based on continued discussions and consultations with the Town of Huntington and the NYSDOT, the widening improvements along the North and South Service Road will be the subject of an Infrastructure Improvement Plan that will detail the source of funding and the timing of construction. Final site plan approval shall be subject to the acceptance of this Plan. Furthermore, the Applicant will provide a \$1.3 million Development Impact Fee to the Town for economic development programming, transportation infrastructure in the Melville area and traffic improvements along the Walt Whitman Road corridor benefitting the existing travel public as well as Canon's site generated traffic.

**Comment 97:**

*Walt Whitman Road @ LIE South Service Road: Due to the assumption noted in page 33 of the traffic study "it is reasonable to assume that the improvement could be extended westerly to the Old Walt Whitman Road intersection as well", the proposed traffic analysis shows better results. Under the 2010 Build with DOT improvement analysis at LIE South Service Road and Old Walt Whitman Road has one (1) left and through shared lane, two (2) through lanes and one (1) exclusive right turn lane on the EB approach. Two through lanes are currently carried forward to east of Old Walt Whitman Road (see Photo 2) not the proposed three. While Town of Huntington improvements show one (1) left and through shared lane, one (1) through lane and one (1) exclusive right turn lane on EB approach and it shows two (2) lanes east of Old Walt Whitman Road carried on. Again the assumed*

*additional eastbound thru lane in the analysis by the applicant is resulting in better traffic operating conditions than be anticipated at this intersection. Again we would like to know clearly in the report if the applicant is willing to add the lanes/turn bays as suggested in the analysis as they are not part of either project programmed by the Town of Huntington or NYSDOT. (Letter from GPI dated October 07, 2008)*

**Response:** It is recognized that confirmation of the implementation of planned/proposed mitigation measures within the adjacent roadway network will require further clarification and as such the Canon development team continues to consult with the Town of Huntington and the NYSDOT regarding how and when these improvements will be constructed. See response to Comment 90 for mitigation timing and funding.

**Comment 98:**

*The bridge over the Long Island Expressway (I-495) is a major bottleneck on Old Walt Whitman Road. A widening of the bridge will undoubtedly be very expensive. A sharing of the expenses for the widening of the bridge would be equitable and satisfy the needs of the community. (Planning Board Hearing Minutes, page 44, October 1, 2008)*

**Response:** It is our understanding that the Town of Huntington and the NYSDOT are currently in discussions regarding potential replacement of the bridge structure at a future time.

**Comment 99:**

*The report suggests that significant mitigation is needed to address the project's traffic impacts but within the study the applicant does not accept responsibility for constructing these off-site improvements claiming rather that they are already programmed by others (i.e. NYSDOT & Huntington) or the municipal projects should easily be able to expand their respective project limits to include the necessary roadway geometrical improvements. This seems to be the heart of the matter. (Letter from GPI dated October 07, 2008)*

**Response:** The intent of the comprehensive Traffic Impact Analysis is to assess the existing, no-build and build conditions of the adjacent roadway network and identify mitigation measures where necessary. The Applicant continues to diligently negotiate funding and construction scheduling issues with regard to these

improvement measures. The funding and scheduling mechanisms must be effectively coordinated to ensure a streamlined implementation. It is also important to note that the Applicant is committed to providing a \$1.3 million Development Impact Fee to the Town for economic development programming, transportation infrastructure in the Melville area and traffic improvements along the Walt Whitman Road corridor that would significantly benefit the existing travel public.

**Comment 100:**

*All design and construction costs associated with changes required to Walt Whitman Road are the responsibility of the applicant. This is in addition to monies committed to the Walt Whitman Road reconstruction project by the previous property owner. (Letter from Town of Huntington Department of Transportation and Traffic Safety dated September 8, 2008)*

**Response:** A Development Impact Fee of \$1.3 Million dollars will be paid by the Applicant and deposited in the Town's Trust and Agency Account established for economic development programming, transportation infrastructure in the Melville area and traffic improvements related to the Walt Whitman Road corridor.

**Comment 101:**

*LBA believes that the Town Board and Planning Board must condition any determination on the DEIS, and the issuance of any certificates of occupancy, on the implementation of all of the elements of the mitigation package (including the items described in LBA's original letter of September 26, 2008 and in this supplemental letter). The site must not be allowed to be occupied and operated without all mitigation being completed. The Town should require CANON to pay for the off-site mitigation measures that are necessary to accommodate the project, including without limitation, the cost of widening and adding traffic lanes to Walt Whitman Road and the South Service Road. The additional incremental costs of these necessary improvements are not material to the overall cost that CANON will be spending to complete the project, and to the overall benefit that CANON will realize from the approvals so granted. (Letter from LBA Melville Associates LP dated October 13, 2008)*

**Response:** Canon, the Town of Huntington and the NYSDOT continue to coordinate regarding the timing of the proposed mitigation throughout the adjacent roadway

network and will persist in doing so until a reasonable construction schedule has been identified. See response to Comment 90 for mitigation timing and funding.

**Comment 102:**

*The report states that the vast majority of off-site mitigation will be implemented by New York State Department of Transportation (NYSDOT) and Town of Huntington improvement projects that are 'already completely or partially funded'. Recently, the Town of Huntington was made aware that NYSDOT eliminated \$2M worth of funding that was slated for improvements on Walt Whitman Road. We are hoping to resurrect this funding source, but at this time, the Town's project schedule and scope is uncertain. Therefore, it is possible improvements on Walt Whitman will not be in place prior to Canon's occupancy of this site. Also, projects on the scale of the Town and NYSDOT's projects are often delayed for various reasons, so it is reasonable to expect that Canon will be constructed in advance of either agency's improvements. Therefore, we recommend that this applicant construct all of the improvements recommended within the report along the site's LIE South Service Road and Walt Whitman Road frontage, including road widening to provide additional travel lanes on both corridors, at a minimum. (Letter from Town of Huntington Highway Office dated October 10, 2008)*

**Response:** See response to Comment 90 for mitigation timing and funding.

**Comment 103:**

*The recommended mitigations measures, other than ones to be implemented by NYSDOT and the Town of Huntington projects, must be defined by the developer and progressed by the developer and/or others. NYSDOT has no plans to extend the project limits as outlined in comment # 3 (above). (Letter from NYSDOT dated October 24, 2008)*

**Response:** See response to Comment 90 for mitigation timing and funding.

**Comment 104:**

*The list of unfunded actions indicated as necessary in the report as significant are summarized below. But those listed involving roadway reconstruction are limited to the following off-site improvements:*

- *The extension of the NYSDOT's planned additional third lane on the LIE North and South Service Roads from a point about 600 ft. west of RT. 110 through Walt Whitman Road to a logical point west of Walt Whitman Road. On the North Service Road likely considerably longer than the 200 ft recommended in the traffic Study and on the South Service for a distance at least the length of the Canon property.*
- *A further widening of the N. LIE Service Road on the WB Walt Whitman Road approach to accommodate a left turn lane as considered in the SYNCHRO analysis.*
- *Widening Walt Whitman Road along the frontage of Canon to accommodate an additional SB thru lane and auxiliary turn lanes into the site. The widening needs to be sufficient enough to ensure retention of shoulders which the Town retained in its original reconstruction plans.*
- *Traffic Signal Installation at Canon's main access driveway. (Letter from GPI dated October 07, 2008)*

**Response:** The funding for all items mentioned is currently being discussed by the Applicant, the Town of Huntington and the NYSDOT.

**Comment 105:**

*Many of the measures that CANON identifies are “unfunded” mitigation measures (e.g., widening of the Walt Whitman Road overpass bridge, etc.) and CANON does not provide any guidance or make any provision as to how these necessary measures are to be provided. CANON defers to the Town to arrange for the funding of the mitigation that it describes, other than the limited frontage improvements it proposes to make to its site. (See, DEIS 8.4, p.8-9). Further, the DEIS assumes that all mitigation measures will be in place, but in fact there is currently no plan and no means by which many of the mitigation items are to be completed. This is a major flaw in CANON’s analysis and DEIS, as there must be certainty as to how mitigation measures are to be accomplished and paid for. It is not enough for CANON to simply “wish away” these necessary and required infrastructure improvements. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** The Canon development team recognizes that once the funding sources for the off-site mitigation measures beyond the scope of the NYSDOT’s and Town’s

projects are fully identified and funded, it would be prudent to assign a timeline for mitigation completion to coordinate the associated construction effort with the Town's and NYSDOT's area-wide improvements. The anticipated construction schedule will be provided as soon as it is available. ATDE believes that the Traffic Impact Analysis has assessed the impact of these improvement measures appropriately within the five traffic analysis conditions considered.

**Comment 106:**

*Mr. Charles Olivo (Atlantic Traffic) purported to summarize the proposed traffic mitigation, but he failed to make clear that while the DEIS refers to a number of potential mitigation measures, there is no certainty as to how, when or even if these measures will be completed, or how they will be paid for. As indicated in our first letter, the DEIS assumes that these measures (mostly to be undertaken by the State and Town) will be completed, but there is no assurance of that. On the other hand, he repeated the DEIS conclusion that if the mitigation measures are completed, they should be sufficient to accommodate the CANON proposal. What is implicit is that if the measures are not completed, there will not be adequate infrastructure of traffic capacity to accommodate the expected traffic increases. As indicated in our original comment letter, we believe additional mitigation measures are required, and that the mitigation called for in the DEIS are not sufficient.*

*Of further concern is the statement by CANON's Counsel, made at the end of the Hearing, to the effect that the mitigation would be realized in connection with the project could take as long as 15-20 years to achieve. This is not acceptable. LBA believes that the mitigation (with the possible exception of the widening of the Walt Whitman Road bridge) must be completed prior to the issuance of certificates of occupancy for, and the actual occupancy of, the CANON site. (Letter from LBA Melville Associates LP dated October 13, 2008)*

**Response:** The Canon development team, along with the Town of Huntington and the NYSDOT, are working aggressively to identify sources of funding for the mitigation measures outlined in the Traffic Impact Analysis. See response to Comment 90 for mitigation timing and funding.

**Comment 107:**

*In addition to the mitigation measures identified by CANON in its DEIS, additional intensive mitigation measures must be provided. Among other possible measures,*

*the following additional mitigation measures must be provided for and completed prior to issuance of certificates of occupancy:*

- *Extension of additional eastbound traffic lane on the LIE South Service Road for the full length between Walt Whitman Road and Route 110. Representatives of CANON, the Town, the State and others were unanimous (at the September 10<sup>th</sup> meeting\_ that this item is necessary. The DEIS identified as a part of the mitigation to be performed, that portion of the NYSDOT plan that calls for a partial widening of the South Service Road approach to Route 110. The DEIS says that “it is reasonable to assume that the improvement could be extended west to the Old Walt Whitman Road intersection.” (See DEIS 8.41, p. 8-12). This MUST be made a part of the overall mitigation package to achieve maximum traffic safety and capacity.*
- *Coordination and active participation among the Town, County, State and federal governments to make sure that the two overpass bridges (Walt Whitman Road and Route 110) are widened to add needed traffic and turn lanes. Priority must be given to the widening of the Walt Whitman Road overpass bridge, which is not currently being formally considered as a part of the NYSDOT infrastructure improvements. Coordination amount the Town and State is imperative to make certain that this component is scheduled for action by the NYSDOT and funded so that this can be completed in connection with the CANON build-out. As a possible interim measure, the Town need to implement a reconfiguration of the lane striping on the Walt Whitman Road bridge so that the traffic flow capacity can be maximized for the period prior to the completion of the expansion.*
- *Confirmation with NYSDOT that all of the proposed mitigation efforts affecting state-controlled infrastructure (e.g., LIE service roads, Walt Whitman Road and Route 110 bridges, etc.) have been fully analyzed by and formally approved by NYSDOT. Adequate funding must be secured by the Town (or provided by CANON) to make certain that these improvements can be constructed.*
- *Property synchronized signalization patterns must be established among the various traffic lights at all points (including the new traffic light proposed at the main CANON entrance on Walt Whitman Road).*

- *Significantly increased traffic control and code enforcement by the Town will be required to insure that the new traffic signs, lights, signals and controls are complied with, and to make certain that the vastly increased traffic volumes are safely accommodated. Enforcement will be necessary to make sure that motorists do not use the LBA site as a pass through or cut around to avoid the inevitable queuing that will take place at the intersection of the South Service Road and Walt Whitman Road. In addition, enforcement is necessary to prevent dangerous circumvention of traffic patterns as is already exhibited when there exists "block the box" conditions at the South Service Road and Walt Whitman Road intersections (described above). (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** Each bullet point of this comment have already been considered within the Traffic Impact Analysis or as part of the review agency coordination effort completed by Atlantic Traffic & Design Engineers. Page 37 of the Traffic Impact Analysis details the proposed Old Walt Whitman Road coordinated traffic signal network and our office will continue to coordinate with Town officials regarding implementations of these improvements. With regard to enforcement measures within the study area network, Atlantic Traffic & Design Engineers as well as the applicant have no jurisdiction over enforcing what is requested and therefore defer to the Town for comment.

**Comment 108:**

The assumption noted in page 33 of the traffic study *"it is reasonable to assume that the improvement (addition of a third lane on the north and south LIE Service Roads) could be extended westerly to the Old Walt Whitman Road intersection as well"* is perplexing as it assumes it will be constructed by the DOT in their owned programmed Route 110 project. Furthermore, this significant mitigation measure has been included in the No Build condition scenario thereby providing better levels of service than will actually exist. This in turn would appear to reduce the potential impact of the Canon Build scenario when comparing to the no-build scenario as this unfunded improvement is assumed to be already part of the network - when in fact, it is not.

We understand that a number of negotiations and discussions have arisen with Town and State officials with regard to potential funding of roadway improvements. The following statement in the report is very telling: *'The following mitigation package*

*includes improvements to the area-wide transportation network that would be required to address Canon's traffic impact on the noted intersections. These modifications are regionalized improvements and are not necessarily required for the efficient ingress and egress from the site itself."* While some "modifications" may not be necessary to access or egress the site directly, they are nevertheless needed to reach to the site and permit the existing traffic to get to their destination without significant further delay caused by the Canon development. (Letter from GPI dated October 07, 2008)

**Response:** See response to Comment 90 for mitigation timing and funding. ATDE believes that the Traffic Impact Analysis has assessed the impact of these improvement measures appropriately within the five conditions provided.

**Comment 109:**

*We residents want the traffic issues in the vicinity of the proposed Canon site to be addressed prior to its opening.* (Form Letters 1 through 6)

**Response:** Canon, the Town of Huntington and the NYSDOT continue to coordinate regarding the implementation of roadway improvements throughout the adjacent roadway network.

**4.6.7 Right-of-Way / Real Estate / Utility**

**Comment 110:**

*The utilities to this site should be brought in via Old Walt Whitman Road due to the control of access along the service road and will conform to NYSDOT's Utility Accommodation Policy.* (Letter from NYSDOT dated October 24, 2008)

**Response:** We are currently coordinating with the site engineer to identify options for re-routing the electric, telephone, and CATV services to Old Walt Whitman Road. Water, gas, and sanitary service connections are proposed to be made on Old Walt Whitman Road as per the Site Plan.

**Comment 111:**

*In addition to the regular coordination with utilities, please note that the (Northville) petroleum pipeline exists within the general area.* (Letter from NYSDOT dated October 24, 2008)

**Response:** The Site Plan Package has been prepared with the Northville petroleum pipeline in mind. We appreciate the Department bringing this to our attention.

**Comment 112:**

*The proposed widening on the west side of Old Walt Whitman Road appears to impact the existing signal pole on the southwest corner. The site plans (overall) C--3.1, is not clear regarding widening, (Letter from NYSDOT dated October 24, 2008)*

**Response:** The proposed widening along Canon's LIE South Service Road frontage would likely require that the existing traffic signal pole at the southwest corner be relocated. The specific design features of the intersection will be clearly defined in roadway improvement plan construction documents.

**Comment 113:**

*Is the "jog" in the northerly property line (approx. 1000 ft w/o Walt Whitman Rd) shown correctly? It does not seem to be consistent with the highway boundary according to our records or the tax maps. (Letter from NYSDOT dated October 24, 2008)*

**Response:** The "jog" in the northern property line (approx. 1000 ft. w/o Old Walt Whitman Road) is depicted on the survey prepared for the Canon application. This survey references the deeds for the property and coincides with the northern edge of Tax Lot 400-254-1-9. Any minor discrepancy will be resolved administratively prior to the submission of any required right-of-way dedication documentation.

**Comment 114:**

*The small triangular shaped parcel (approx. 400 ft w/o Walt Whitman Rd., and labeled 'NYSDOT Permanent Easement Parcel 17...Map 12') is shown on the plans. Is it owned by others? Will it remain excluded from the proposal? (Letter from NYSDOT dated October 24, 2008)*

**Response:** The property in question is Tax Lot 400-254-2-3 and is owned by the Culter Hammer Corp., according to the survey prepared for the Canon application. It is important to note that this property is not part of the Canon proposal.

**Comment 115:**

*Any utility work proposed in State Highway right-of-way will require separate application and submission of plans (installation details, restoration details and Maintenance and Protection of Traffic plan - all referenced to NYSDOT specification item numbers and the Manual of Uniform Traffic Control Devices) to our Melville Maintenance facility. The applicant may contact Mr. Rich Fiore at (631) 420-4270 for further directions regarding Utility Highway Work Permit (HWP) applications. The applicant should be made aware that utility Highway Work Permit issuance is subject to issuance of the Highway Work Permit required for site work. (Letter from NYSDOT dated October 24, 2008)*

**Response:** We understand the NYSDOT's policy for utility work and we will coordinate with Mr. Fiore in the Melville Maintenance Facility to obtain all necessary permits for utility connections in the NYSDOT Right-of-Way prior to construction.

**Comment 116:**

*During the circulation of the NY 110 Design Report, the US Department of Fish and Wildlife requested that NYSDOT implement ways to offset impacts to migratory bird species via native plantings and landscape restoration. The developer may also want to consider the Department of Fish and Wildlife's request. (Letter from NYSDOT dated October 24, 2008)*

**Response:** Canon will strongly consider implementing methods to offset the impacts to migratory bird species by way of native plantings and landscape restorations in and around the subject site.

#### 4.7 Air Quality

**Comment 117:**

*Air quality will be negatively affected by the thousands of new car trips plus the idling of engines of vehicles queuing up at traffic signals. In addition, greenhouse gases will be released, thus increasing the carbon footprint of the project. What measures will be taken to mitigate these negative impacts on air quality? (Planning Board Hearing Minutes, page 38-39, October 1, 2008)*

*Of paramount importance is to make sure that the Canon project, and all other ongoing and pending projects, are planned, implemented and completed without increasing pollution (air, noise, water), and without exacerbating the other environmental, health and safety conditions of the area. (Letter from LBA Melville Associates LP dated September 26, 2008)*

*The substantially increased vehicular volume in the as-built condition will also certainly have a detrimental effect on air quality in the area. This is particularly true since there will be more vehicles concentrated in the area for longer periods, with more idling as a result of vehicle volume. Intuitively, these conditions will decrease the air quality due to increased emissions. This will be unhealthy for motorists and pedestrians, as well as workers in the various office locations in the area. The extent of this air quality impact, and any potential mitigation should be the subject of analysis in the DEIS and consideration by the Town Board. (Letter from LBA Melville Associates LP dated September 26, 2008)*

*In our original letter, we pointed out that the Town needs to have Canon analyze the air quality impacts and potential mitigation, that is currently missing from the DEIS. This point was also brought out by Mr. Christopher O'Connor of the Neighborhood Network at the Hearing, and we obviously concur with him. (Letter from LBA Melville Associates LP dated October 13, 2008)*

**Response:** An Air Quality Screening Analysis was performed to determine if any intersections near the Canon, USA site would require full air quality analysis. The screening was done according to the methodologies outlined in the New York State Department of Transportation (NYSDOT) Environmental Analysis Bureau Environmental Procedures Manual (EPM). When intersections fail to pass through all of the EPM screening levels, it means that any carbon monoxide concentration predicted in a microscale air quality analysis would likely be well below ambient standards, and therefore no full study is required.

The screening included signalization, traffic flow quality (known as "Level of Service" and discussed at length in the Traffic Impact Study prepared by Atlantic Traffic & Design Engineers), site-generated traffic volumes, changes in approach speeds, and future Build condition traffic volumes. As a result of the screening, no intersection analyzed in the Traffic Impact Study requires full air quality analysis. The Screening Report is included in this document (Appendix C).

**Comment 118:**

*The DEIS does not at all address the potential air quality impact of the project (both during the construction phase and in the as-built condition). This analysis is necessary since the construction of a building of this magnitude will certainly result in dust and other particle disbursement, as well as increase the emissions from construction-related equipment and vehicles. While the DEIS makes reference to dust generated during the construction phase (See, DEIS 16.1.3 and 16.2.1, p. 16-2 and 16-3), there is no analysis of the air quality nor any substantive testing plans nor mitigation measures related to this concern. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** Best management practices for erosion and sediment control during construction were provided in Section 3.2.6 of the DSEIS and include dust control measures. In addition, specific dust control measures were provided in the Site Specific Health and Safety Plan for Earthwork Operations provided in Appendix C of the DSEIS.

#### 4.8 Noise

**Comment 119:**

*Of paramount importance is to make sure that the CANON project, and all other ongoing and pending projects, are planned, implemented and completed without increasing pollution (air, noise, water), and without exacerbating the other environmental, health and safety conditions of the area. (Letter from LBA Melville Associates LP dated September 26, 2008)*

**Response:** Potential noise impacts were addressed in Section 10 of the DSEIS.

#### 4.9 Cultural Resources

**Comment 120:**

*On pages 1-9 & 11-1, the document indicates that Canon is addressing the March 25, 2006 letter from the New York State Office of Parks, Recreation and Historic Preservation [OPRHP]. More information on how OPRHP's concerns are being addressed shall be provided. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** Canon USA has communicated with appropriate officials from the New York State Government. Canon has been informed that the New York State Office of Parks,

Recreation and Historic Preservation ("OPRHP") will defer to the Town of Huntington Planning Board, the lead agency on this issue.

Several archaeological studies have been performed on this property. A detailed Phase 1A and 1B Cultural Resource Investigation prepared by Greenhouse Consultants in 1990 determined that the project site is not significant for historic or prehistoric purposes. A Phase II Archaeological Intensive Testing Survey was performed by Tracker Archaeology Services, Inc. in January 2006 to further examine several specific areas of the property. That report identified the criteria for nomination to the National Register of Historic Places and then determined:

*In our opinion, the Wulforst Site is not eligible for the historic registers for the following reasons:*

- *No features were encountered and artifacts were largely limited to the plow zone. Although the Phase I and II investigations produced 2 Late Archaic looking points, previous investigations have shown that a Late Woodland component was present on the project area making precise interpretations difficult in a multicomponent plow zone site without features.*
- *Spatial analysis for intersite patterning is of limited benefit within heavily plowed areas with small to moderate artifact concentrations such as the project area. As proven during the Phase I plowing and re-plowing of the project area during Phase II field work, the position of Locus A and Locus B shifted about 150 feet to the east for Locus A and 150 feet to the west for Locus B.*
- *Artifact density was extremely sparse for most of the project area as judged by half of the Test units recovering No artifacts.*

Canon will exercise reasonable efforts to identify historically significant resources that warrant preservation during the soil remediation phase, the site work and the construction phase of the development. In the event that anything of significance is observed, Canon will undertake appropriate measures to ensure that material that has verifiable archaeological or historical significance is protected by an appropriate methodology. Canon will commit to engaging required professional assistance if necessary to effectuate such methodology.

#### 4.10 LEED

##### **Comment 121:**

*Canon is pursuing Silver LEED certification for the site. What would it take to achieve Gold or Platinum certification? (Planning Board Hearing Minutes, page 30, October 1, 2008)*

**Response:** A Silver LEED certification was required pursuant to a recent Local Law change; our target was Silver LEED certification. We intend to do everything possible to make this as “green” a building as possible and guarantee to the Town that the facility will be Silver LEED certified. Our efforts will not be limited to Silver LEED certification, however, Canon is only required to attain Silver certification.

The US Green Buildings Council’s LEED rating system awards credits in the five categories Canon reviewed; there are other categories for operation and existing buildings comprising another rating system. Canon has not ruled out a higher level of achievement. Canon is still investigating a full basket of potential measures and conducting pay-back and cost-benefit analyses to understand what works best for Canon. Some of the energy measures, such as photo-voltaics and renewables, provide additional points but can be very expensive and are not economically feasible without grant incentives. Such measures may depend upon other potential financing.

##### **Comment 122:**

*Is Canon aware of any program offered by LIPA that would promote or provide incentives for solar power installations? The board offers assistance, if needed, to facilitate such an arrangement with LIPA. (Planning Board Hearing Minutes, pages 32-33, October 1, 2008)*

**Response:** While solar power is not included in this project, Canon will continue to evaluate the cost effectiveness of integrating other renewable energy strategies into the project. We will certainly call upon the board to help us review all of our opportunities in this regard.

##### **Comment 123:**

*It has been stated that 75 percent of the construction waste from the site would be diverted from the local landfill. Where will this waste go? (Planning Board Hearing Minutes, pages 33-34, October 1, 2008)*

**Response:** The construction waste will be diverted to recycling centers or other businesses that have established markets for construction waste. Construction waste comprises pieces of gypsum board, wood, metal and other material scraps.

**Comment 124:**

*Is there a significant market for construction waste on Long Island? (Planning Board Hearing Minutes, page 34, October 1, 2008)*

**Response:** There are significant markets in the New York Metropolitan area. It is not known whether these markets are specific to Long Island. However, the construction waste industry has grown significantly over the past five to ten years in the New York Metropolitan area.

**Comment 125:**

*The Neighborhood Network has worked diligently in over nine towns to create new energy codes for residential construction to Energy Star standards. We challenge Canon to promote the highest standards in energy efficiency and use of renewables. (Planning Board Hearing Minutes, pages 37-38, October 1, 2008)*

**Response:** Canon is committed to a high standard of energy efficiency and continues to research cost effective renewable energy opportunities.

4.11 Community Services

**Comment 126:**

*Further describe the method and practices that will be utilized to manage your waste and recyclables on site, in accordance with your LEED certification objective. (Intra-Office Memorandum from Town of Huntington Department of Planning and Environment dated October 14, 2008)*

**Response:** The plans now include three separate compactors for cardboard, glass, and food/general waste, a trash room inside the building with at-grade access for a garbage truck, a refrigerator for food waste, and a composting area outside the kitchens.

**Comment 127:**

*Allow me to present an analogy in order to immediately get to the point of this letter. Imagine you are going to a railroad station. As you arrive the train commences. to pull*

*out and indeed does pull out and proceeds towards its destination and you're not on it. That is exactly the situation the Board of Fire Commissioners believes it is faced with at this point. For the past three plus years the Board has followed the Canon project as it was unfolding. We have had discussions and meetings with previous representatives of Canon USA (i.e. Robert Hasselbach). The last such meeting with him was January 2007, at which time we appeared to be headed towards a reasonable working relationship. After reviewing the draft supplemental impact statement and in particular Section 13 community services, we would be less than candid if we didn't indicate that in regard to the Canon project the Board of Fire Commissioners of the Melville Fire District has serious concerns surrounding life and safety issues of this endeavor. We respectfully request a meeting to air our concerns long before the train pulls out. (Letter from Melville Fire District dated October 23, 2008)*

**Response:** Two meetings have been held between Canon and the Melville Fire District and all issues raised by the District will be addressed by Canon as part of the Building Permit process.

**Comment 128:**

*The Impact Study regarding our Sub Station #2 on the South Service Road is incorrect. (Letter from Melville Fire District dated October 27, 2008)*

**Response:** According to James Milazzo of the Melville Fire Department, the headquarters of the Melville Fire Department is at 531 Sweet Hollow Road and there are three (3) substations located at 60 Amityville Road, 500 South Service Road and 274 Old Country Road.

**Comment 129:**

*The Board has issues regarding item number 13 of the Impact Study, specifically item 13.3, Proposed Mitigation. (Letter from Melville Fire District dated October 27, 2008)*

**Response:** It is unclear what mitigation is being referred to, all issues are being addressed at the meetings between Canon and the Melville Fire District.

**Comment 130:**

*The Board has concerns regarding the height of the building, specifically our access the top floors of the building. Although the proposed building may meet with all aspects of fire life safety code; and we are totally aware that the New York State Building Fire Prevention Code, which is at best a minimum code, is the code in effect. However, our concerns for total life safety exceed these minimum standards. The size and configuration*

*of the parking structures are such that automatic fire suppression will be imperative in a fire scenario. (Letter from Melville Fire District dated October 27, 2008)*

**Response:** The project has been designed to meet all code requirements. Automatic fire suppression is not required for the parking garages and is not being provided.

**Comment 131:**

*Interior communications from all areas in each structure will be required to backup the Melville Fire Departments radio system. (Letter from Melville Fire District dated October 27, 2008)*

**Response:** The Melville Fire Department provided information on their communications systems to Canon in January 2009 and Canon is reviewing how these can be accommodated.

**Comment 132:**

*The Fire District must be assured that a Schedule K will be issued by the Town of Huntington prior to the Certificate of Occupancy being issued. (Letter from Melville Fire District dated October 27, 2008)*

**Response:** This will be handled by the Town of Huntington.

**Comment 133:**

*Although preliminary site drawings have been submitted, the Fire District hasn't received any floor plans of the two office buildings for our comments. (Letter from Melville Fire District dated October 27, 2008)*

**Response:** Canon provided several sets of site plans including floor plans to the Fire District and the Fire Department has selected the location for the fire command panel.

*4.12 Utilities*

**Comment 134:**

*The Canon site is situated at the westerly boundary of the Water District's low, pressure zone. Due to the size of the proposed building (900,000 SF) and the location within the District and proximity to existing mains, improvements and reinforcements to the water supply system must be made. In order to provide proper fire protection and domestic water service for the site, the old 8" cast iron main on Walt Whitman Road along the frontage of the subject property shall be replaced with new 12" ductile iron main. Also, new water main is required along the LIE South Service Road, in order to eliminate an*

*existing dead-end main and complete a hydraulic loop between the high and low pressure zones. The interconnection of the two pressure zones will allow for two means of water supply to the site should there be an unfavorable pressure or flow condition in either zone. (Letter from H2M dated September 30, 2008)*

**Response:** Canon has conducted a water flow test at the existing 8” main (Appendix E). The results of the water flow and pressure test determined that adequate water pressure (94 psi) is available to service the new building based on the project plumbing engineer calculations. There is no need to increase the 8” main to a 12” main.

**Comment 135:**

*The District is requiring that each of the two proposed combined fire and domestic water service feeds to the site originate on separate supply mains; one on Walt Whitman Road and the other on the South Service Road. All on-site water facilities shall remain private and therefore shall be the responsibility of the developer/owner. (Letter from H2M dated September 30, 2008)*

**Response:** As there is not an existing water main along the South Service Road, this requirement cannot be satisfied.

4.13 Socioeconomics

**Comment 136:**

*Is the Pearl Kamer socioeconomic analysis based on both Phase I and II and is there a breakout for Phase I? (Planning Board Hearing Minutes, page 29, October 1, 2008)*

**Response:** The socioeconomic analysis includes Phases I and II. Phase I is discussed separately in Pearl Kamer’s letter.

**Comment 137:**

*What are the current number of Canon employees on Long Island? What are the projected Canon employment levels for Year 2010 and 2020? (Planning Board Hearing Minutes, page 29, October 1, 2008)*

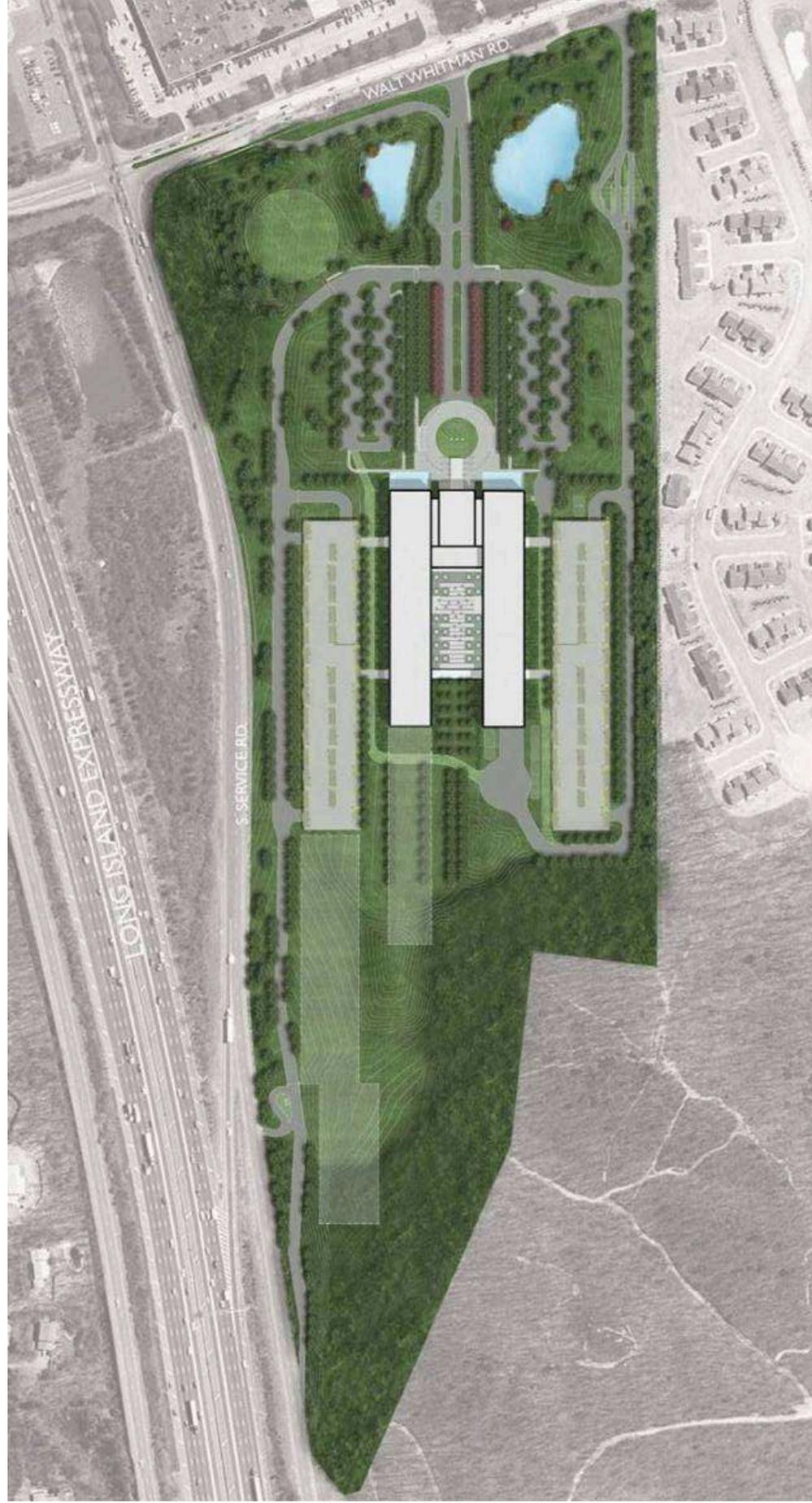
**Response:** Canon currently employees approximately 1,500 workers on Long Island. By Year 2010 and 2020, Canon projects employments levels of 1,500 and 3,000, respectively.

**Comment 138:**

*What is the estimated tax impact of the project?* (Planning Board Hearing Minutes, page 31, October 1, 2008)

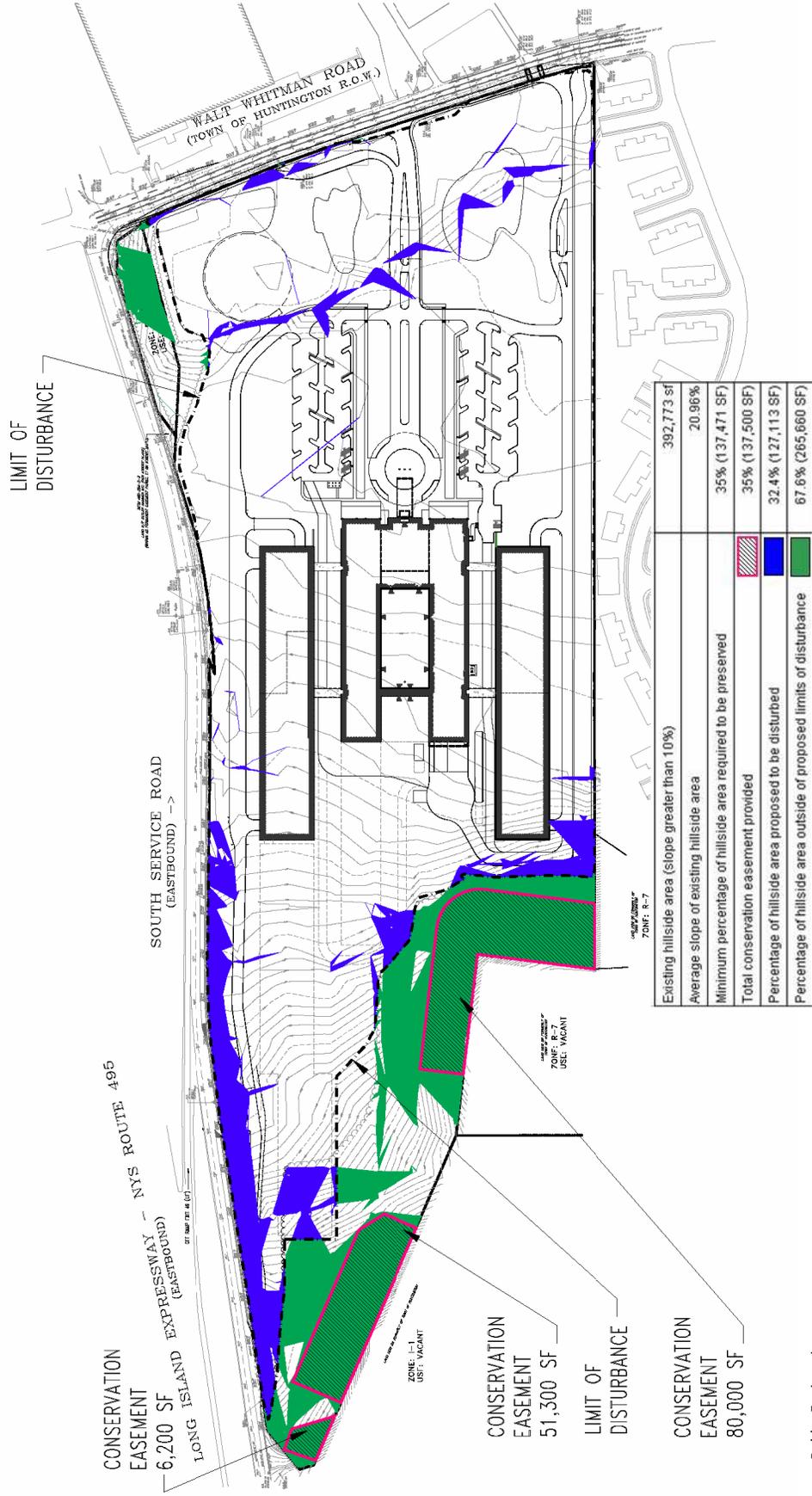
**Response:** The tax impact on this project will be approximately fifty to hundred times the current tax base. In addition to the secondary multiplier, we estimate an injection of over \$1.5 billion into the local economy.

Figure 4-1. Rendered Master Plan



Source: HOK

Figure 4-2. Steep Slope Analysis and Proposed Conservation Easement



Source: Bohler Engineering

## 5. Mitigation Measures

Measures that have been incorporated into the design of the proposed development to mitigate potential impacts of the proposed project are summarized below.

### Soils

- While the majority of the site's topsoil is contaminated and will be stripped and capped, uncontaminated topsoil and subsoil removed during grading would be stockpiled for later reuse.
- Soil Remediation
  - Soils exceeding the Suffolk County Department of Health Services level for arsenic will be managed in accordance with an approved Soil Management Plan. The development activities will require stripping the topsoil as this material is not suitable for use as structural fill or backfill in its current state. The topsoil will be buried in areas of the site where structural fill or backfill are not required (e.g. beneath landscape areas and berms) or may be blended to reduce arsenic concentrations and/or organic content for surficial application or use as road/parking lot base. Similarly, the shallow arsenic-impacted sands beneath the topsoil will be buried within the roadway embankment in the northwestern portion of the site, encapsulated beneath asphaltic pavements or building slabs, and/or blended with the underlying clean sands to establish compliance with the SCHDS Guidance, Town of Huntington requirements, and project objectives for on-site beneficial re-use.
  - The combination of preventing/mitigating dust emissions during construction and redeveloping the site as proposed will provide for a protective environment with respect to residual arsenic concentrations post-development.
- Construction Methods
  - The health and safety procedures and dust mitigation measures outlined in the *Site-Specific Health and Safety Plan for Earthwork Operations* (HASP) will apply to all on-site earthwork activities involving the arsenic-impacted soils and sands of the site. By employing proper safety and precautionary procedures during site earthwork activities, including dust suppression and ambient particulate monitoring, the arsenic impacted soils will be effectively managed on site in accordance SCDHS guidance documents.

- Concurrently with the on-site management of the elevated arsenic containing soils, ambient particulate air monitoring services will be performed in accordance with the HASP.
- Ambient particulate (dust) concentrations will be monitored at the perimeter of the site during earthwork activities involving management of arsenic-containing soils. A minimum of two (2) real-time air monitoring devices will be utilized for total particulates with actual ambient dust levels recorded every 15 minutes. One device will be a fixed-based station between the subject property and the residential properties to the south during activities including disturbance of the arsenic impacted soils. A minimum of one additional device will be based toward areas of earthwork activity and/or visible dust migration.
- Water trucks and other measures will be provided to conduct dust suppression activities during earthwork operations involving disturbance of soils with elevated arsenic levels. An elevated particulate level of  $>15\text{mg}/\text{m}^3$  would trigger an action level or dust suppression response utilizing a water tank spray bar and pump. Dust mitigation through water application will be repeated in areas where visible evidence of particulate liberation is observed. Details of the air monitoring program will be included in the HASP.
- As soils at the property contain arsenic at a concentration that exceeds SCDHS Guideline of 4.0 ppm, appropriate future operations and maintenance considerations must be adhered to ensure future protection of site occupants and other personnel. As specified in the HASP:
  - No person shall make any alteration, improvement, or create a disturbance to the site, which interferes with any engineering control or area of arsenic contaminated soil without first obtaining approval from the property owner/operator and the Town of Huntington, as necessary.
  - Upon completion of any disturbance of engineering control or arsenic contaminated soils these disturbed areas must be restored to pre-disturbance conditions.
  - The owner or operator shall ensure that all applicable worker health and safety laws and regulations are followed during the alteration, improvement, or

disturbance, and during the restoration, and that exposure to arsenic contamination in excess of the applicable standards does not occur.

- The owner or operator shall maintain records of the nature of the alteration, improvement, or disturbance, the dates and duration of the alteration, improvement, or disturbance, the name of key individuals and their affiliations conducting the alteration, improvement, or disturbance, the amounts of soil generated for disposal, if any, the final disposition and any precautions taken to prevent exposure.
  - The persons responsible for conducting the remediation of the arsenic, the Owner, and the subsequent owners, lessees, and operators, shall monitor and maintain the engineering controls to ensure that the controls instituted continue to be protective of the public health and safety and of the environment. If at any time, the proposed controls are determined to no longer be protective, additional remediation or protective measures may be warranted or required.
- Erosion Control Plan
    - An erosion control plan based on Best Management Practices (BMP's) recommended in New York Guidelines for Urban Erosion and Sediment Control and NYSDEC's Urban Stormwater Runoff Management Practices Catalogue will be followed during construction.
    - An extensive erosion control plan will reduce runoff during construction. A controlled sequence of measures would insure that runoff and sediment receiving areas are prepared in advance of major site disturbances. An erosion-control seed mixture would be used containing 50% annual ryegrass and 50% perennial ryegrass for quick and effective stabilization of the soils. A series of hay bales and silt fences would be placed to capture coarse and fine sediment.
    - Silt fences would also be installed to prevent material from washing away. Earth stockpiled for longer than fifteen (15) days would be stabilized by either seeding it with the erosion control seed mixture referred to above, or mulching it with hay.
    - Maintenance of the erosion control measures would include removal of accumulated sediment and trash from all control structures and the basin, repair or replacement of damaged swales, diversions, silt fencing, hay bales, and reseeding where necessary. The construction entrance would be stabilized with crushed stone to prevent soil and

debris from being carried onto roads. Construction-related erosion control measures would be removed during final landscaping.

### **Topography**

- The proposed site development preserves a substantial portion of the wooded steep slopes on the western portion of the site as well as the steep slopes in the northeastern corner of the property.
- Typical erosion control measures would be taken to protect the site during construction.
- The final grade surface, once established, would be stable, non-erosive, and fully vegetated, where appropriate.

### **Groundwater and Sewage Disposal**

- Canon will pursue LEED silver certification. Design strategies related to LEED certification will lower water consumption and wastewater generation.
  - Water conservation methods would reduce consumption of public water.
  - Canon will utilize water efficient landscape plantings, primarily natives that will not require irrigation after initial establishment. This kind of landscaping will reduce water use associated with the grounds by 50 percent to meet the Water Efficient Landscaping requirements of LEED silver certification.
  - Permanent irrigation will only be used for the entryway area.
  - The irrigation system, used only seasonally, would be tied to moisture sensors and limited to the early morning to reduce unnecessary water consumption caused by evaporation losses.
  - Drip irrigation would be utilized wherever possible in those areas specified for irrigation.
  - The facility will also reduce water use through the installation of efficient fixtures, automatic, no touch faucets, and other water-saving devices.
  - Pervious materials would be used wherever possible to increase infiltration.
- Stormwater would be efficiently managed to maximize treatment prior to recharge. The

stormwater management plan for Phase 1 and Phase II is designed to contain and recharge 100% of site runoff from a 9-inch rain storm. Phase II will include additional minor system enhancements, i.e. supplemental drywells and similar structures.

- There would be limited use of fertilizers and pesticides to maintain the natural and landscaped areas of the site.
- The project will connect to the Southwest Sewer District No. 3 for wastewater treatment.

### **Land Use**

- The site and buildings will be attractively designed.
- The existing I-1 zoning is compatible with the adjacent commercial and industrial zoning.
- The Long Island Expressway to the north would serve as an effective barrier between the proposed development and uses to the north.
- The preservation of the wooded area on the western portion of the site would buffer the proposed use and the R-40 zone to the west.
- A planted berm will be constructed along the southern property line to buffer the proposed south parking garage from the R-7 zone to the south. The berm and plantings would provide visual mitigation.
- Additional site landscaping and building architectural features would provide visual buffering, help soften the interface between the uses, and incorporate the proposed office development into the area.
- To reduce the heat island effect, the majority of site parking will be under cover and in parking garages. In addition, shade trees are proposed to cover the asphalt-paved surface parking area.

### **Open Space and Recreation**

- A multi-story building and multi-story parking garages are proposed to maximize open space.
- The amount of open space provided exceeds the LEED standard of 20% of the site area. In addition, over 60% of the steep slope/hillside area of the site (defined as any area steeper than 10% slope) is being preserved.

- The proposed plan includes recreational opportunities for workers including a picnic area.

### **Cultural Resources**

- Canon will exercise reasonable efforts to identify historically significant resources that warrant preservation during the soil remediation phase, the site work and the construction phase of the development. In the event that anything of significance is observed, Canon will undertake appropriate measures to ensure that material that has verifiable archaeological or historical significance is protected by an appropriate methodology. Canon will commit to engaging required professional assistance if necessary to effectuate such methodology.

### **Visual Resources**

- A berm planted with tightly spaced large trees is provided between the South Garage and the property line.
- The front entrance to the complex will be from Old Walt Whitman Road. The foreground of the view will be highlighted by the two retention ponds. The pond perimeters and banks will be landscaped with native grasses and shrubs. Ornamental trees will grace the entryway and will lead to the reflecting pools at the building lobby entrance.
- Extensive use of landscaping treatments elsewhere on the site will provide visual buffering of the uses within the site and between the site and adjacent properties.
- In addition to being in conformance with the Chapter 143 of Town Code, the Canon USA lighting plan minimizes site lighting and provides the following protective measures:
  - Although the USGBC credit allows for 1 footcandle (FC) of light trespass ten (10) feet onto neighboring property, the Canon USA plan provides zero (0) FC of light at the site perimeter.
  - Minimal lighting is provided along the southern site perimeter adjacent to the residential area.
  - Lighting along the drive to the South Garage is 0.5 FC except at the guard booth and two (2) entrances, where it is 2.0 FC. Those three areas require slightly more lighting for security and accident prevention.
  - The entire surface parking area is illuminated at the minimum of 0.5 FC.
  - Other than interior intersections and guard booths, where 2.0 FC is provided, the

remainder of the site lighting is designed for 0.5 FC.

### **Community Services and Revenues**

- The chief economist of the Long Island Association predicted a positive economic impact from an estimated investment of \$636 million for site development and increased area earnings of over \$678 million.
- Area jobs will increase directly by 3,000 plus a projected 7,100 secondary jobs. The project will employ a large number of highly trained personnel in technical fields including medical systems, semiconductor equipment, information technology, imaging systems and corporate planning.
- Local goods and services output are projected to increase more than \$1.3 billion, including the original expenditure.
- The tax impact on this project will be approximately fifty to hundred times the current tax base.
- An office use will provide tax revenues to the school district and library district without a need for services.
- As part of the building permit process, Canon will address the fire safety concerns of the Melville Fire District. No building permit for a building, structure or use shall be issued in whole or in part without certification in writing from the Town of Huntington Fire Marshal that the construction documents for such building, structure or use are satisfactory.

### **Stormwater Management**

- The stormwater management system for Phase I and Phase II has been designed so that 100% of stormwater runoff from a 100-year 24-hour storm will be contained on-site, exceeding the LEED standard.
- A variety of stormwater quality measures are proposed, including bio-swales to treat runoff from the surface parking areas and stormwater quality units to remove silt and hydrocarbons from runoff from the on-site roadways.
- Drainage recharge areas (DRAs) and two (2) ponds will receive site runoff. The DRAs will be naturally landscaped and sized to store a nine (9) inch rainfall event and allow natural recharge.

- The ponds will be attractively landscaped with native vegetation and would settle fine solids and associated contaminants. Pond bacteria would break down nitrogen compounds and organic materials.
- An extensive erosion control plan will reduce runoff during construction.

### **Vegetation and Wildlife**

- Virtually all of the Pitch Pine-Oak Forest would remain.
- A variety of ornamental landscapes would be created on the site. They would include courtyard plantings, managed landscapes in areas such as the parking area medians, “natural” areas with native Long Island species, drainage recharge areas planted with local grasses, and numerous wetland species associated with the ponds. All the various landscapes would enhance the appearance of the site and be coordinated with the structures and other amenities. The plantings, particularly the trees, would help reduce the visual impacts of the development on adjacent properties and uses.
- Native plants that require little or no pesticide, fertilizer, and minimal supplemental water will be used..
- The two (2) ponds constructed as part of the stormwater collection and treatment system will provide new habitat for a variety of aquatic plants and animals. Indigenous plant and animal species will populate the ponds once the ponds become established. Aquatic and avian wildlife habitat will be created in and around the pond. Fish and amphibians, if possible, would be stocked in the pond. Once established, aquatic invertebrates and birds would also utilize the pond.
- Site plantings will include a preponderance of native Long Island species that will offer a more effective wildlife habitat than imported ornamentals.

### **Traffic and Transportation**

- In an effort to reduce the number of daily employee trips and to meet Leadership in Energy and Environmental Design (LEED) requirements, Canon U.S.A., Inc. has approved the following Employee Trip Reduction Initiatives for the new corporate headquarters:
  - Commuter Choice Program

- Canon launched a Commuter Choice Fair in coordination with Long Island Transportation Management. Employees signed up for car-pools. Incentives are being offered to employees who take mass transit or car pool to Canon's Long Island offices.
- As part of the Commuter Choice Program, Canon implemented a “guaranteed ride program” to ensure a ride home for car-poolers in a time of emergency.
- Canon is investigating employees paying for transit benefits with pre-tax dollars.
- Encourage public transit and vanpools.
- Evaluate a shuttle service between the train stations and Canon.
- Provide reserved parking for both hybrid and electric vehicles and electric power sources/ outlets for recharging.
- Encourage use of bicycles by providing 40 bicycle spaces.
- Implementation of the following employee staggered arrival-departure program to minimize the concentration of site-generated traffic on the adjacent roadway network during peak hours:
  - 8:00 a.m. to 4:00 p.m.
  - 8:30 a.m. to 4:30 p.m.
  - 9:00 a.m. to 5:00 p.m.
  - 9:30 a.m. to 5:30 p.m.
- Extend the time period that the departure gates are open as a result of the staggered arrivals/departures program so as to promote the progression of outbound traffic. Presently, the departure gate at the Lake Success facility is open from 5:00 p.m. to 5:30 p.m. only.
- Provide a bus stop for the MTA Long Island Bus line N95 along the Old Whitman Road site frontage.
- Recommended Infrastructure Improvements:

- South Service Road – Widen eastbound approach and install traffic signal equipment as necessary – from Canon driveway to Old Walt Whitman Road
- South Service Road – Widen eastbound approach – from Old Walt Whitman Road to NYS Route 110
- North Service Road – Widen westbound approach – from NYS Route 110 to Old Walt Whitman Road
- North Service Road – Widen westbound approach and install traffic signal equipment as necessary – Old Walt Whitman Road to LIE On-Ramp
- Old Walt Whitman Road – Traffic Signal at site driveway; improvements to southbound Old Walt Whitman Road along Canon frontage; intersection approach improvements at North Service Road and South Service Road; signal timing and offset modifications at intersections from Old Country Road to Route 110 as indicated in the study; pavement marking modifications along the Bridge
- NYS Route 110 – traffic signal timing modifications

## Noise

- No mitigation is required for traffic noise.
- For mechanical equipment, specifications will be issued at the appropriate stage of the design process and will contain the above maximum noise level criteria for each unit. As the design progresses and where necessary, noise control will be specified for the rooftop exhaust fans. The target noise levels for the cooling towers should be easily achievable with standard units and with no additional noise control. External generators will be supplied with acoustic enclosures designed to not exceed 75dB(A) at 15 feet.
- The earthen berm along the southern boundary and the two-story parking structure will provide additional sound reduction for the cooling towers and generators.

## Utilities

- Solid Waste - Recycling is a prerequisite for LEED certification. At least one half of the solid waste will be recycled.
- Energy - Canon plans to achieve LEED points in the Energy and Atmosphere categories through the use of technologies such as energy recovery, high efficiency equipment,

advanced HVAC and lighting controls and sensors, and photo-dimming. Other energy-savings strategies will include use of low-wattage fluorescent bulbs; lighting reflectors; installation of high R-value wall and ceiling insulation; variable speed fans and pumps; vestibules; locating total building control systems in the basements of the office buildings; and implementation of enhanced commissioning and enhanced refrigerant management.

## **Construction Impacts**

- Construction Materials
  - The proposed base course for the paved areas on-site will consist of locally recycled RCA (Recycled Concrete Aggregate).
  - All proposed drainage piping will be ADS MegaGreen ST Corrugated Polyethylene Pipe, which has a minimum recycled content of 40%.
  - The proposed fencing will include recycled materials.
- Construction activities would be confined to the hours of 7 AM to 6 PM.
- Heavy equipment operation or other construction activity that might be accompanied by “loud or disturbing noise” would be restricted to the hours of 8 AM to 6 PM.
- A soil management plan with BMPs for control of erosion and sedimentation will be implemented during the construction phase that also includes stormwater management measures. In addition, a soil management plan has been prepared to address the low level arsenic concentrations from agriculturally-impacted soils.
- The health and safety procedures and dust mitigation measures outlined in Site-Specific Health and Safety Plan for Earthwork Operations (HASP) will apply to all on-site earthwork activities involving the arsenic-impacted soils and sands of the site.
- By employing proper safety and precautionary procedures during site earthwork activities, including dust suppression and ambient particulate monitoring, the arsenic impacted soils will be effectively managed on site in accordance SCDHS guidance documents.
- The proposed berm along the southern perimeter of the site adjacent to the residential area will be constructed first to reduce the potential noise impacts of construction.

- Construction related noise would be mitigated in part by the ambient noise of the adjacent Long Island Expressway.
- Construction vehicles will be scheduled for arrival before the morning peak hours of 8 AM to 9 AM to reduce traffic disruption. Construction vehicles will have left the site before the evening peak hours of 5 PM to 6 PM. At other hours, traffic management will be provided by the construction contractor to reduce disruption to the normal flow of traffic.