



South Shore Audubon Society
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Thank you for providing the public with an opportunity to submit spoken and written comments at the Nassau Hub Project Environmental Review on January 18, 2024.

South Shore Audubon represents 1,400 member households in southern Nassau County. We submit the thoughtful comments below regarding the Nassau Hub project's potential environmental impacts on two of its closest neighbors, Hempstead Plains Preserve and Francis T. Purcell Preserve.

About Hempstead Plains and its Preserves

Before the arrival of the Europeans, native grasses and herbs grew on Long Island in vast open spaces which were created by natural fires or cleared or burned by the native Americans. The largest of these, the Hempstead Plains, once stretched the entire length of Nassau County. It is now almost completely paved over and virtually extinct. Source: www.ehamptonny.gov

The Hempstead Plains once covered 40,000 acres. Nassau County designated **Hempstead Plains Preserve**, a 19-acre parcel of land, for perpetual preservation in recognition of its unique ecological and historical value. Historically, the Hempstead Plains served as the "Cradle of Aviation" and home to the former Mitchell Field Air Force base and several early flight endeavors, including Charles A. Lindbergh's historic flight in his *Spirit of St. Louis* from Long Island to Paris, France. It was the world's first solo, nonstop transatlantic flight.

The **Francis T. Purcell Preserve** is a 27-acre portion of the Hempstead Plains, a highly ecological and historically significant preserve in central Nassau County. It is named for the 1978–1987 Nassau County Executive. Purcell Preserve is part of Nassau county's green-space holdings but is not designed for public access at this time. Source: www.nassaucountyny.gov

The Critical Importance of the Preserves to the Environment and to the Public

Since 1970, three billion birds have been lost in North America. Bird populations have declined in almost every habitat – forests, shorelines, mountains, deserts, etc. Grassland birds have declined more than any others. Grassland obligate birds have evolved over millions of years to mostly only live, forage and reproduce in grasslands. As grasslands vanish, mainly due to development, grassland bird species vanish; they have nowhere left to live in Nassau County. We also lose grassland pollinator species and grassland plants from Long Island's biodiversity.

There is an economic benefit of birds and pollinators for agriculture and our food supply. That's why NYS just passed the Birds and Bees Protection Act of 2023. Hempstead Plains pollinators, birds and plants also benefit our mental well-being to know they are still out there, as they have been since native Americans sculpted Hempstead Plains, that we cared and conserved them, did not let them disappear, and our children can still go visit them here.

The preserves offer a totally unique opportunity to study the native ecosystems of Nassau County, for students from pre-K through PhDs, environmental scientists, the community, as well as the general public.

Negative Impact of the Nassau Hub on the Preserves

The Nassau Hub proposal, if realized without the considerations and concessions listed below, will have a huge and irreparable impact on our last bastion of prime native Hempstead Plains / Long Island grassland ecosystem. It would finish off the last remnants of the once-vast Hempstead Plains forever.

South Shore Audubon is an environmental conservation organization and a nonprofit, all-volunteer chapter of the National Audubon Society. We are a member of the Audubon Council of New York State. SSAS's territory covers the southern half of Nassau County.

The mission of the SSAS is to promote environmental education; conduct research pertaining to local bird populations, wildlife, and habitat; and to preserve and restore our environment, through responsible activism, for the benefit of both people and wildlife.

Ways to Save the Hempstead Plains for Our and Future Generations

1. Nassau County should enact now to design and (when it's ready) to open Purcell Preserve for public nature-viewing access, which is currently prohibited.
2. Provide an environmental buffer or border to insulate Purcell Preserve from any visual, light, noise or other environmental encroachment from the Nassau Hub.
3. Keep Nassau Hub traffic flow off the short, non-strategic Nassau County roadway, James Doolittle Blvd, except for Purcell Preserve visitors only.
4. We ask for Nassau County to continue to provide for and increase fiscal responsibility and funding consideration to further preserve and enhance the Hempstead Plains preserves – to prepare and open Purcell Preserve to public nature-viewing and to strengthen the remaining 95 acres of Hempstead Plains in Appendix B against the proposed Nassau Hub project stressors.
5. Any new development at the Nassau Hub should include bird-safe building design, especially with glass and lighting. We understand that Seatuck Environmental Association will be submitting comments under their own separate cover, and SSAS fully endorses and approves of Seatuck's bird-safe building and bird-friendly lighting comments as they apply to any new development at the Nassau Hub.
6. With potential for up to 350-foot-high towers or buildings, ensure that no portion of Purcell Preserve gets shaded out by that.
7. Coordinate with nearby Nassau Hub neighbor, Covanta, to ensure that air and water pollution produced by Nassau Hub development are below acceptable limits, especially as LI air quality already exceeds WHO limits on particulate matter, and LI water is already contaminated with PFAS, 1,4 dioxane, VOCs, and the latest ecocides, neonicotinoids. The first three are known carcinogens; the last was just banned by the Birds and Bees Protection Act of 2023, which will help phase neonic ecocides out of NY agriculture, landscaping, food supply, water supply by 2029.
8. Comply with NYS Climate Leadership and Community Protection Act (CLCPA) aim to achieve 85% reduction in greenhouse gas emissions by 2050, with an interim target of 40% by 2030.
9. A document like a NYS DEC Comprehensive Habitat Protection Plan (CHPP) or a proxy for it should be drafted, signed into effect, and followed for the maintenance, mowing schedule, care, and conservation of the Hempstead Plains Preserve, Purcell Preserve, and adjoining Hempstead Plains parcels B and D in Appendix B.
10. It is prudent to include the cumulative impact of the Nassau police compound and the proposed Langone project along with the proposed Nassau Hub project. Collectively, they will ALL surround and encroach negatively on the ecological, recreational, educational, and aesthetic value of what remains of the Hempstead Plains. It's not only the Nassau Hub that's endangering HPP and Purcell, but all the surrounding development from every angle. One can currently see the encroachment of the Nassau Police property on HPP, as they are building out the back lot now along their shared property line with HPP. So, we also need that neighbor to address the environmental impact on HPP, including putting up a view-, light- and noise-buffering divider along their property facing HPP, such as a thick hedgerow.

It seems reasonable to ask for the considerations and concessions listed above, to continue preserving and improving the last of the Hempstead Plains environment, and conserving LI grassland species that still want to exist here, however perilously clinging onto their lives and their last remaining habitat in central Nassau County. Please let's help them to persevere in our world. If we don't, who will?

Thank you very much for your time and consideration to this important matter.

Russ Comeau, President
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Appendix A – Grassland Specialist Species of Conservation Concern

Existing remnant patches of Hempstead Plains grassland are surrounded by urban development and illegal garbage dumping has been common. It is extremely vulnerable to further development and associated disturbances. It has been colonized by invasive exotic species, and successional shrublands or successional southern hardwoods.

However, adequate protection, restoration, proper management, and no further development in and around the sites, should allow the Hempstead grassland's viability to improve. Source: guides.nynhp.org/hempstead-plains-grassland/

LI Grassland Specialist Birds (1) Endangered, (3) Threatened, (3) Special Concern, (2) High Priority

#	Common Name	Scientific Name	Species Status
1	Short-eared Owl	<i>Asio flammeus</i>	NY/LI: Endangered ¹
2	Northern Harrier	<i>Circus hudsonius</i>	NY/LI Threatened ²
3	Upland Sandpiper	<i>Bartramia longicauda</i>	NY/LI Threatened ²
4	Henslow's Sparrow	<i>Centronyx henslowii</i>	NY/LI Threatened ²
5	Horned Lark	<i>Eremophila alpestris</i>	NY/LI Special Concern ³
6	Vesper Sparrow	<i>Poocetes gramineus</i>	NY/LI Special Concern ³
7	Grasshopper Sparrow	<i>Ammodramus savannarum</i>	NY/LI Special Concern ³
8	Bobolink	<i>Dolichonyx oryzivorus</i>	NY/LI High Priority ⁴
9	Eastern Meadowlark	<i>Sturnella magna</i>	NY/LI High Priority ⁴

¹: Endangered native species in imminent danger of extirpation or extinction in NYS.

²: Threatened native species likely to become an NYS endangered species within the foreseeable future.

³: Native species for which a welfare concern or risk of endangerment has been documented in NYS.

⁴: High Priority Species of Greatest Conservation Need

Source: NYS DEC

Pollinators of the Hempstead Plains Preserves - (1) Threatened, (1) Critically Imperiled

#	Common Name	Scientific Name	Species Status
10	Frosted Elfin	<i>Callophrys irus</i>	NY/LI Threatened ⁷
11	Hand-maid Moth	<i>Datana ranaeiceps</i>	NY/LI Critically Imperiled

Plants of the Hempstead Plains Preserves - (4) Endangered, (14) Threatened, (1) Rare

#	Common Name	Scientific Name	Species Status
12	Sandplain Gerardia	<i>Agalinis decemloba</i>	Fed & NY Endangered ^{5,6}
13	Soapwort Gentian	<i>Gentiana saponaria</i>	NY/LI Endangered ⁶
14	Eastern Silvery Aster	<i>Symphyotrichum concolor</i>	NY/LI Endangered ⁶
15	Britton's Coast Violet	<i>Viola brittoniana</i>	NY/LI Endangered ⁶
16	Stargrass	<i>Aletris farinosa</i>	NY/LI Threatened ⁷
17	Purple Milkweed	<i>Asclepias purpurascens</i>	NY/LI Threatened ⁷
18	Green Milkweed	<i>Asclepias viridiflora</i>	NY/LI Threatened ⁷
19	Midland Sedge	<i>Carex mesochorea</i>	NY/LI Threatened ⁷
20	Bushy Rock Rose	<i>Crocanthemum dumosum</i>	NY/LI Threatened ⁷
21	Low Rock Rose	<i>Crocanthemum propinquum</i>	NY/LI Threatened ⁷
22	Small-leaved Trefoil	<i>Desmodium ciliare</i>	NY/LI Threatened ⁷
23	Narrowleaf Bush Clover	<i>Lespedeza angustifolia</i>	NY/LI Threatened ⁷
24	Nuttall's Milkwort	<i>Polygala nuttallii</i>	NY/LI Threatened ⁷
25	Blunt Mountain Mint	<i>Pycnanthemum muticum</i>	NY/LI Threatened ⁷
26	Few-flowered Nutrush	<i>Scleria pauciflora</i>	NY/LI Threatened ⁷
27	Narrowleaf Whitetop Aster	<i>Sricocarpus linifolius</i>	NY/LI Threatened ⁷
28	Hyssopleaf Hedge Nettle	<i>Stachys hyssopifolia</i>	NY/LI Threatened ⁷
29	Northern Gama Grass	<i>Tripsacum dactyloides</i>	NY/LI Threatened ⁷
30	Birds-foot Violet	<i>Viola pedata</i>	NY/LI Rare ⁸

⁵: Listed as Endangered under the Federal Endangered Species Act.

⁶: Listed as Endangered by NYS: In imminent danger of extirpation in NY.

⁷: Listed as Threatened by NYS: Likely to become Endangered in the foreseeable future.

⁸: Listed as Rare by NYS: Likely to become Threatened in the near future.

Source: New York Natural Heritage Program

Appendix B: 95-acre Contiguous Hempstead Plains Grassland Proposal

A larger, more contiguous, and resilient Hempstead Plains preserve can better diffuse impacts from the Nassau Hub. Simply, more grassland acreage combined across 4 parcels will be more attractive to grassland specialist birds.

Location	Parcel	Acres (approx.)
Hempstead Plains Preserve	A	19
Unnamed	B	7
Francis T. Purcell Preserve	C	27
East Meadow Brook	D	42
Total		95

Parcels A, C, and D (but currently not B) have intact acreage of Hempstead Plains grassland. Sections of all 4 parcels can be prioritized to be restored back to Hempstead Plains grassland habitat by selectively replacing successional old field, scrubland and hardwoods with appropriate Hempstead Plains grassland plant species.

Parcel D also includes stream and wooded wetland ecosystems running alongside the Meadowbrook Parkway. It adds valuable biodiversity including LI native woodland and wetland plants, pollinators, and bird species.

