Town of Mount Pleasant
Planning Board
One Town Hall Plaza
Valhalla, N.Y. 10595

Richard Wisniewski
118 Philip Place
Hawthorne, N.Y. 10532

September 15,2020

Thank you for the opportunity to participate during the September 3,2020 Planning Board Public Hearing related to the North 60 development.

Since the time allotted to each public participant to speak was extremely limited, I indicated at that time that my concerns and issues with the DEIS document would be summarized in a letter to the Planning Board.

These are my key comments:

- In the Traffic & Transportation section of the DEIS---Section 3 I on page 33 the statement is made:

  "there are no major improvements proposed by the NYSDOT surrounding the project site"

The highway and roadway infrastructure surrounding the North 60 parcel is totally inadequate to handle both the existing traffic volume from the Valhalla county complex (hospital, prison, etc.) along with the addition of the volume to be created from the North 60.

What does this inadequacy translate into at two key intersections:

1) Old Saw Mill River Road & NYS Route 9A & new Hospital Rd/West Road connector
2) Bradhurst Ave (NYS Route 100)-at Hospital Road

1) Old Saw Mill River Road & NYS 9A & West Road

This is effectively a three (3) way intersection although it is not noted as such in the DEIS?

At this juncture, Route 9A will be coming together with both Old Saw Mill Road and with this new Hospital Road extension using West Road.

If using 9A and coming from the North-(commuters travelling South), they would need to attempt to make a left hand turn without any turn lane, any traffic signal or other accommodation into oncoming 9A Northbound traffic. This would be directly before a bend in the 9A roadway providing limited sight & visibility of oncoming traffic. Also 9A has no center median. Again the turn would be into an effectively 3 way intersection. This traffic would then need to travel up on West Road. West Road is a winding, inclined, narrow and poorly maintained road surface which will not be able to handle the volume of traffic anticipated.

Backups will occur on 9A at this turning point into the three way intersection, leading to a dangerous and hazardous driving situation, especially during the AM peak commute.

Much of this new volume plus existing traffic from the Valhalla campus In the evening will be looking to get to 9A South then onto the Saw Mill South at Eastview. From there access to the Mario Cuomo Bridge and Yonkers/points south is provided.
To get to either the Mario Cuomo bridge or to continue down south on the Saw Mill Pkwy----to do so from the North 60---remember also there is no westbound entry ramp onto I 287 from the Sprain Brook Parkway.
All of this volume leaving the North 60 will need to get to this 3 way intersection at Old Saw Mill Road, new Hospital Rd/West Rd. and Route 9A and again without any traffic signal or turn lane ,attempt to turn across 9A Northbound traffic with this bend in the road and get onto 9A South towards Eastview.
This will never work, again with the inadequacy of both the three way intersection as now constructed and the poor West Road condition. It's not just dangerous but also will back up any cars attempting to use this West/ Hospital Road connector to get to 9A ,to go in either direction.

The traffic statistics in the DEIS are misrepresentative of the actual auto traffic that will be using the new Hospital Road connector to West Road then down to the three way intersection discussed.
The actual volume will be a combination of those individuals working or visiting all the county facilities on the Valhalla campus (
hospital, prison, etc.) plus the new activity generated from the North 60.

The Planning Board needs to include in the DEIS a proper study and evaluation of this intersection at Route 9A, Old Saw Mill Road and West Road.

The Planning Board also needs to include in the DEIS a proper study and review of West Road (a Town of Mount Pleasant roadway).

At a July Planning Board session, it was mentioned that the NYS DOT had suggested that the impact of the North 60 development together with the proposed old Green Valley nursery redevelopment into a warehouse/office complex be studied together. This is an excellent idea. The Planning Board should take whatever steps it needs to take to initiate such a review.

The planning Board needs to amend the misrepresentative traffic data now shown in the DEIS.

2) **Bradhurst Avenue (NYS Route 100)**
During the morning commute, many of the people (both existing personnel on the Valhalla campus and new traffic for the North 60) will be commuting from the North
Many of these individuals would be using either the Taconic or Saw Mill Parkways South which merge at the Hawthorne circle

They would then likely go the short distance onto the beginnings of the Sprain Brook Pkwy
To the first exit onto Bradhurst Avenue Route 100 South
This is the stretch of Bradhurst from this exit past the Community Center to Hospital Road
This narrow and single lane roadway is already severely taxed----not uncommon---- that back ups occur on this road from the traffic light at Hospital Rd to this exit ramp off the Sprain.
A roundabout does nothing to alleviate this choke point

During the PM peak
These commuters will be looking to use the Sprain Brook North entry ramp on Bradhurst Avenue that's right past the Community Center to then peel off onto either the Taconic or Saw Mill Parkways North to get home.

Again all this new volume in addition to what already exists will be on this same Bradhurst Avenue choke point , in the evening attempting to turn left into oncoming traffic onto the Sprain Brook entry ramp without any turn lane, signal or other traffic facilitator.
It's also not uncommon now for the Taconic to back up all the way onto this Sprain Brook entry ramp in the evening , which will lead to a complete traffic stoppage on Bradhurst Avenue and into Hospital Road.

The Planning Board needs to take what ever steps to have this stretch of Bradhurst Avenue Route 100 from the Sprain exit ramp past the Community Center to Hospital Road properly studied and reviewed. This roadway is already highly congested with existing traffic and the addition of North 60 volume will only exacerbate this situation leading to dangerous backups.

Walking Trail/Pedestrian Connection

Throughout the DEIS document it is stated "**north edge of North 60 will remain undeveloped and a barrier to the community"**

This concept has eminent sense in that the residential community north of the development does not need, and from my view does not want, any access of any kind from the community to the North 60 parcel.

However, on page 65 then again on page 385 of the DEIS, a pedestrian access directly to the North 60 from the intersection of Philip Place and West Stevens Avenue is shown.

The visual simulation on page 150 also shows a parking lot at the intersection of Philip Place and West Stevens Avenue.
For what purpose is this parking lot?
The DEIS says the north edge of the North 60 will remain undeveloped, fine be consistent.

There is no need and no community desire to have this pedestrian access/ walking trail.

The Planning Board needs to have the DEIS corrected so that this contradiction is removed from both the DEIS and in any plans for development.
The access to a Walking Trail/Pedestrian Connection is a direct contradiction to "north edge of North 60 will remain undeveloped and a barrier to the community"

Connectivity to North County Trailway

The DEIS report references, in multiple instances, that the North 60 parcel will have close proximity and access to the North County Trailway.

In fact the two closest points to enter the Trailway are at:
-the intersection of Eastview and the Saw Mill Pkwy—over three miles away and
-the intersection of 9A and 117 in Pleasantville, again about the same distance
To travel so by bicycle for example to either point from the North 60 would require a dangerous journey on the shoulder of Route 9A, a narrow roadway with trucks and other commercial vehicles.

In closing the Traffic and Transportation section of the DEIS is grossly deficient and presents a faulty premise that the surrounding transport infrastructure, as it currently exists, can support the North 60 project. The Planning Board needs to correct this fallacious assumption in the interest of the community residents.

RW 9/15/2020

Richard Wisniewski
118 Philip Place
Hawthorne, N.Y.10532

George Latimer
County Executive

September 28, 2020

Carolyn Saracino, Planning Board Secretary
Town of Mount Pleasant Planning Board
One Town Hall Plaza
Valhalla, NY 10595

County Planning Board Referral File MTP 20-002 – The North 60
Zoning Text and Map Amendments, Site Plan, and Subdivision Approvals
Draft Environmental Impact Statement (DEIS)

Dear Ms. Saracino:

The Westchester County Planning Board has received a draft environmental impact statement (DEIS) (dated accepted July 2, 2020) for the proposed development of a new mixed use community on an undeveloped portion of the County's Grasslands Campus commonly referred to as "The North 60". This approximately 60-acre, County-owned area would be combined with seven additional parcels totaling 20-acres that are owned by the applicant for a total site development of approximately 80 acres. Lots included within the site are demarcated SBL 116.8-1-3 through 9, and SBL 111.20-1-80. The site is located at the north end of the Grasslands Campus, on the north side of Hospital Road (County Road 301). The eastern boundary of the site is the Sprain Brook Parkway and its associated exit for Bradhurst Avenue (NYS Route 100) and Hospital Road. The site also touches Saw Mill River Road (NYS Route 9A) to the northwest, with residential and commercial properties bordering it along its north and west sides. The site is mostly woodland, with some on-site structures which would be demolished. Two streams run north through the site that are tributary to the Saw Mill River.

Because the Town does not currently have zoning controls to regulate a development of this size and scope, the applicant is petitioning the Town to add a new OB-5 MP - Office Business Master Plan district with new regulations that would permit the proposed development. This new zone would follow many of the regulations of the OB-5 – Office Business zone, but allow all of the various uses requested by the applicant. This zone would only be applicable to sites larger than 60 acres, and bordered by a State or County highway. The applicant would then seek to rezone the site from its current split designation of OB-6 and R-20 to OB-5. Once the zoning amendments are in place, the applicant would seek a Master Development Plan approval as well as site plan and subdivision approvals from the Mount Pleasant Planning Board for Phase One of a two-phase development.

Under the Master Development Plan, the applicant is seeking to develop this site with approximately 3 million square feet of bio-tech research and development space combined with retail areas, offices, a children's science center, and a hotel. The 20 buildings on the site are proposed to be between two and seven stories tall. 8,592 total parking spaces are proposed on the site, divided between underground parking garages, two seven-story garages and 434 surface parking spaces. A new street network is proposed throughout the site which would make a connection between Saw Mill River Road and Hospital Road.

The DEIS also presents a development concept that could potentially include 660 residential units in place of some of the medical office space. This scenario, presented as Alternative C, has been proposed according to the recommendations of the *North 60 Market and Financial Feasibility Study*, also known as the Weitzman Study, which is included as Appendix M in the DEIS.

We have reviewed the DEIS under the provisions of Section 239 L, M and N of the General Municipal Law and Section 277.61 of the County Administrative Code and we offer the following comments:

1. Consistency with County Planning Board Policies.

The proposed concept of mixed-use development on the North 60 site is generally consistent with the County Planning Board's long-range planning policies set forth in ***Westchester 2025—Context for County and Municipal Planning and Policies to Guide County Planning,*** adopted by the Board on May 6, 2008, amended January 5, 2010, and its recommended strategies set forth in ***Patterns for Westchester: The Land and the People***, adopted December 5, 1995. The North 60 development has the potential to compliment the existing uses on the Grasslands Campus and it will continue to direct additional growth of research and development space to an area that has long been home to such uses and that can support the additional development. This proposal is consistent with County economic development goals to increase the concentration of science-related research/technical industries in Westchester.

Although not specifically called for in the preliminary concept for this development, we encourage the Town to consider adding a housing component to the development as discussed in Alternative C, since it would help fill the critical need for more housing in Westchester. This need is highlighted by County's *2019 Housing Needs Assessment*, which provides findings on a wide variety of demographic, housing stock and housing affordability issues; and provides recommendations to help the County move forward in meeting its affordable housing needs. We recommend that any housing component be expanded to include a wider range of unit types to better accommodate a diversity of household types. The FEIS should also acknowledge that any housing constructed as part of this development must abide by County requirements.

We also recommend that more flexibility be considered for the retail component of the project, perhaps allowing for more retail opportunities if there is demand created from the residential component and the nearby community.

2. Traffic and transportation impacts.

The proposed development will have impacts on both County and State roads, which will require review from the Westchester County Department of Public Works and Transportation under Section 239-F of General Municipal Law as well as from the NYS Department of Transportation.

Extensive changes are proposed on Hospital Road along the site's frontage. A new eastbound lane is proposed to be added, along with turning lanes at three new entrances to the North 60 site. New traffic signals are also proposed at these intersections. In addition, a roundabout is proposed at the intersection of Hospital Road and Bradhurst Avenue with the northbound Sprain Brook Parkway exit ramp. A new road, to be known as West Street, would also be constructed to provide a new connection between Saw

Mill River Road and Hospital Road through the site, potentially impacting traffic on Saw Mill River Road. We offer the following detailed comments on each of the following aspects:

a. Roundabout

The proposed development includes a roundabout which is proposed to replace the existing signalized intersection at Hospital Road and Bradhurst Avenue. The roundabout would feature an unconventional layout where all vehicles exiting the Sprain Brook Parkway at the Hospital Road/Bradhurst Avenue exit would be required to make a right turn and then enter the roundabout in order to access Hospital Road.

While the roundabout is being proposed as a means to keep traffic circulating and prevent backups on the Sprain Brook Parkway ramp, we are concerned about the confusion the roundabout could create, since vehicles will have to "go right to go left". This confusion could also be exacerbated by the sharpness of the right turn from the ramp into oncoming traffic from the west. It would be preferable to have a more intuitive design, especially since ambulances driving to the hospital from the northbound Sprain Brook Parkway will need to travel via this roundabout. The roundabout is also unconventional in its layout in that it is not in alignment with Bradhurst Avenue, which is the primary road going through the roundabout.

Although the roundabout design in the DEIS is conceptual, we also have concerns about transit, pedestrian and bicycle movements through the roundabout. The roundabout must be able to accommodate trucks as well as both 40-foot and 60-foot (articulated) Bee-Line buses, and should be designed carefully to accommodate bicycles and pedestrians. We point out that the proposed development will put retail and restaurant uses within close walking distance of a large employment site located at 19 Bradhurst Avenue. The roundabout's pedestrian and bicycle elements should be constructed to maximize safety and they should connect to pedestrian and bicycle facilities on the Hospital Road bridge over the Sprain Brook Parkway.

b. Cumulative traffic impacts to Saw Mill River Road

The proposed addition of West Street to the North 60 site, connecting Hospital Road and Saw Mill River Road, will be a valuable connection to alleviate traffic cutting through the residential neighborhood north of Stevens Avenue, and would allow for easier navigation to the Grasslands Campus from the north.

However, as we stated in our recent review of the Acquest Development distribution center, we are concerned about a cumulative traffic impact to Saw Mill River Road that may impact the surrounding municipalities, particularly Elmsford and Greenburgh. Saw Mill River Road is an important traffic artery in central Westchester County in that it is the primary north-south truck route in the area. The addition of hundreds of delivery van trips per day on this corridor, combined with the new development on the North 60 site, warrants additional study which the DEIS does not discuss. We recommend the FEIS include a revised traffic study examining the cumulative traffic impacts to Saw Mill River Road from both of these developments. Specifically, the trip generation analysis of the North 60 development should also include rates for the expected number of heavy vehicle trips along with their distribution on the network.

We also point out that there is an existing emergency access connection between Skyline Drive and the right-of-way which will be utilized for West Street. We recommend that this access point be opened for vehicles, bicycles and pedestrians to avoid a situation where people must travel between Skyline Drive and the North 60 using a circuitous route via Saw Mill River Road.

c. Traffic monitoring program

The DEIS describes a traffic monitoring program that would establish a means for the applicant to report to the Town any changes to the traffic pattern due to development on the site. By collecting data in an ongoing manner throughout the buildout of the development plan, full studies will not have to be conducted for every addition to the site, and continuous data will be available to ensure any problems are recognized and can be mitigated as a whole rather than in piecemeal fashion.

While we are generally supportive of this approach, we recommend shifting the focus away from a level of service model, and instead monitor traffic impacts from the perspective of vehicle miles traveled. The goal with this approach is to reduce the distance vehicles need to travel to reach their destination along with incentivizing the use of mass transit and alternative transportation options through a transportation demand management program. In addition, while the traffic study analysis only includes a peak AM and PM hour based on existing traffic volumes, the monitoring program should consider other weekday or weekend periods that may be impacted due to the development's future generated trips.

3. Transportation demand management and multi-modal access and circulation

One of the policy goals of ***Patterns for Westchester*** calls for the reduction of single occupant vehicle travel. Reducing solo-driving has many benefits, including reduced congestion, improved air quality and reduced demand for parking. We point out that the proposed development plan would include 8,592 parking spaces. Since the number of on-site employees is anticipated to be approximately 8,000, the number of parking spaces provided assumes that a majority of employees will drive to their jobs alone in their cars, which is counter to the County Planning Board's policies.

We recommend the applicant be required implement a transportation demand management (TDM) program aimed at promoting alternatives to single occupant vehicle travel. TDM programs should include physical elements, such as the inclusion of protected bike lanes and paths, pedestrian facilities, bus stops and bus stop amenities. Programmatic elements should include an overall parking management plan that incorporates the cost of parking into a fee structure, and that offers incentives in the form of tax-free commuter benefits for employees to use mass transit, ride sharing, van pooling, non-motorized transportation, bike/scooter sharing and telecommuting opportunities. We note that the County is undertaking a TDM plan for the larger Grasslands Campus, and that any work conducted by the applicant should be integrated into the County's plan. It is also worthwhile to note that the County is currently undertaking a County Mobility and Bus Redesign Study, with an expected completion date of 2021, which may result in a modified transit framework at the Campus.

We also recommend that any public financing, such as IDA financing or payment in lieu of taxes (PILOT) agreements, be conditioned on the creation of a TDM program that aims to reduce single occupancy vehicle travel.

We offer the following comments about specific modes of access and circulation that should be included in both the development plan and the TDM:

Transit

While the DEIS discusses the possibility of instituting a shuttle service from the site to the Hawthorne and Valhalla train stations, we encourage the applicant to also work with the Bee-Line bus system to install new bus stops or layover areas connected to the many bus lines that terminate or run through the Grasslands campus. The County's Bus Stop Planning and Design Guidelines should be consulted for both bus stop and new roadway design and are available through this link: https://transportation.westchestergov.com/bus-stop-planning-and-design-guidelines. For bus stop treatments around separated/protected bike lanes, we recommend using guidelines contained within the NACTO Transit Street Design Guidelines located through this link: https://nacto.org/publication/transit-street-design-guide/ Other comments related more specifically to the traffic impact study technical analysis include:

- As part of the Phase One trip generation, no assignments were made for mass transit, since the transit improvements are only recommended as part of Phase Two. However, we would recommended including transit improvements for Phase One since the Grasslands Campus has existing transit users.
- The FEIS should include any backup sources pertaining to the assumption that 25% of trips will utilize the proposed shuttle service. Backup sources should also be provided for the parking index number provided in the parking plan.
- The proposed street network recommendations for Hospital Road do not reflect the existing northbound (eastbound direction) bus stop, where there is a proposal to construct a channelized right turn lane.

Pedestrian circulation

While the DEIS notes that sidewalks are proposed along all new streets, and that walking paths are proposed for the surrounding wooded areas, it will be important to ensure that pedestrian connections are made to adjacent areas on Skyline Drive and Bradhurst Avenue, as well as to the rest of the Grasslands Campus. As the DEIS points out, the center of the development site is envisioned to act as a "Main Street", with public plazas and seating areas. It will be important for pedestrians to be able to access this area from the surrounding areas without needing to drive.

Bicycle circulation.

Off-street bike paths are proposed along Hospital Road, and along part of West Street. The remaining streets would be marked with sharrow pavement markings as a way to accommodate bicycles. We believe sharrows to be an insufficient design treatment, especially given how the DEIS states that a potential bike sharing program is being considered in conjunction with other uses on the Grasslands Campus. We would be supportive of seeing a bike sharing system implemented, and we believe that this development should include separated bicycle infrastructure along all streets within the development. Bicycle storage areas should be provided for all of the proposed buildings, and racks should be provided outside all retail locations. Charging stations should also be provided at various bike parking locations, for cyclists utilizing e-bikes.

Tarrytown-Kensico Trailway

We note that the DEIS does not include a discussion regarding the proposed Tarrytown-Kensico County Trailway, which is to run along the southern border of the site, parallel to Hospital Road. This trailway would provide an east-west non-motorized connection across central Westchester, connecting the North County Trailway and the Bronx River Pathway. The Tarrytown-Kensico trailway will also have the regional benefit of connecting a number of large employment and educational sites to the County's trailway network.

We point out that the proposed widening of Hospital Road and the new roundabout could affect the design plans for the trailway. This should be discussed in detail in the FEIS and any new construction that occurs on the North 60 site should accommodate, and not preclude, the installation of the trailway. We also recommend the Town consider if additional segments of this trailway could be constructed beyond the project site to help better facilitate non-motorized travel to and from the North 60.

4. Phasing

The Master Development Plan is proposed to be completed in two phases. The first phase proposes the construction of 500,000 square feet of the Master Plan's building space, including the hotel, sections of the retail and medical offices, and one of the biotech buildings. These buildings would be arrayed around the new Main Street and along Hospital Road. West Street is also proposed to be constructed during this phase, along with some of the interior streets. Unlike the full master plan, a large portion of the parking area is to be constructed as surface parking. The applicant proposes 905 surface parking spaces and 886 spaces located within garages below the proposed buildings. The Phase One parking lots are proposed to be constructed within the footprints of the proposed Phase Two buildings. The stormwater management and wetland remediation programs would begin during Phase One, including the construction of a pond, retention basins, and underground retention tanks.

While we are appreciative of the applicant providing most of the master plan's parking within structures or below grade, we are concerned about the amount of surface parking proposed in Phase One. If the full master development plan never gets constructed, a large amount of impermeable surface parking would remain. We recommend revisions to Phase One to reduce the amount of surface parking, or to only construct the parking that is needed.

5. Sewage flows.

We note that the DEIS includes a discussion of the County Department of Environmental Facilities' policy requiring inflow and infiltration (I&I) mitigation for projected increases in sewer system flows from the site.

As a general matter, the County Planning Board further recommends that the Town implement a Town-wide program that requires inspection of sewer laterals from private structures for leaks and illegal connections to the sewer system, such as from sump pumps. These private connections to the system have been found to be a significant source of avoidable flows. At a minimum, we encourage the Town to enact a requirement that a sewer lateral inspection be conducted at the time property ownership is transferred and any necessary corrective action be enforceable by the municipal building inspector.

6. Maintenance of infrastructure.

The DEIS does not contain a discussion about the overall financial productivity of the North 60 in terms of validating whether taxes and payments to the County will be sufficient to pay for future infrastructure rebuilds which the County will bear in future years. We recommend the FEIS include this discussion.

7. Recycling.

The EIS should demonstrate that there will be sufficient storage measures provided to accommodate the County's recycling program and that the development will comply with reporting requirements for recycling. County regulations for recycling may be found at http://environment.westchestergov.com.

In addition, given the large size of the development site, and the likelihood that food waste will be generated, the final EIS should also contain a discussion concerning the potential for the on-site composting of food waste. Composting can contribute substantially towards reducing the waste stream that the County must process. Composting can also provide a resource in maintaining on-site landscaping.

8. Green building technology.

We are supportive of the applicant's intention to construct the proposed development following LEED energy standards, and we commend their dedication to establish the Science Center.

Please inform us of the Town's decision so that we can make it a part of the record.

Thank you for calling this matter to our attention.

Respectfully,
WESTCHESTER COUNTY PLANNING BOARD

By: Norma V Drummond

Norma V. Drummond
Commissioner

NVD/MV

cc: Lance MacMillan, Regional Director, NYS Department of Transportation, Region 8
Anne Darelius, NYS Department of Transportation, Region 8
Christopher Lee, NYS Department of Transportation, Region 8
Michael Dispenza, Contract Administrator, County Department of Public Works and Transportation
Kevin Roseman, Traffic Engineer, County Department of Public Works and Transportation
Hon. Paul Feiner, Supervisor, Town of Greenburgh
Garrett Duquesne, Commissioner, Town of Greenburgh Department of Community Development & Conservation
Hon. Robert Williams, Mayor, Village of Elmsford
Michael C. Mills, Village Administrator, Village of Elmsford

Carolyn Saracino

From: blosapio <blosapio@aol.com>
Sent: Tuesday, September 29, 2020 3:16 PM
To: Carolyn Saracino
Subject: North 60 Proposal

Dear Chairperson McLaughlin and
Board members.

We have lived less than a half mile from the Medical Center for the past 35 years.
We are in favor of Mr Fareri's North 60 project for many reasons:

Job opportunity, much needed Town tax revenue, increased real-estate values in Mt Pleasant and surrounding area's headed up by a man that has led by example, one being
The Maria Fareri Children's Hospital.
I am sure that Mr Fareri will go above and beyond the call of duty keeping the integrity not only to Mt Pleasant residents but to the entire surrounding areas with this labor of Love.
We encourage the Planing Board for a expeditious process in approving this much needed project during these trying times.
We trust in the Boards judgment,
Sincerely,
Bill Losapio
34 Taylor Road
Valhalla
914-843-8855

Please confirm receipt.

Domenick Vita
156 Pythian Avenue
Hawthorne, NY 10532
914-332-1043
914-6493349

September 28, 2020

BY ELECTRONIC MAIL: csaraciso@mtpleasantny.com
Town of Mount Pleasant Planning Board
One Town Hall Plaza
Valhalla, NY 10595
Attn: Carolyn Saracino

Re: North60 Project DEIS - Questions For Consideration During Open Period

To the Members of the Town Planning Board of Mount Pleasant:

I attended the open planning board meeting on September 3, 2020 to discuss the DEIS for the North60 project and raised some questions which I would like to add here for the record and also to further expand on for further comment in the DEIS:

The questions I have concern the following topics:
1. Tax Impact
2. Cost for Offsite Improvements
3. Construction Traffic
4. Ethylene Glycol and Soil Testing/Remediation
5. Controls over other nuisances including air pollution, noise pollution and light pollution

1. Tax Impact Questions:

What will the tax impact on Town of Mount Pleasant taxpayers be on a yearly basis from the inception of the project to its conclusion, and then for the next several years after completion of the project (and should such amount not be known, could a forecast be prepared in advance of finalizing this proposal) for the following:
- any road creation, widening, improvements and maintenance,
- any water service area expansions, improvements and maintenance,
- any sewer creation, improvements and maintenance, and
- any land improvements and maintenance outside of the North60 site.

By “tax impact”, above, I mean what is the amount that the average Mount Pleasant taxpayer in town is expected to pay more as a result of any and all of the bullet points above, should each be made in accordance with the DEIS and North60 plan.

By “forecast”, above, I mean has any forecast been done, and, if not, can one be done to assess what the real impact and cost of this North60 project will be on the local Mount Pleasant tax payers.

By “improvements”, above, I mean any widening, re-paving, extending, re-surfacing, or other necessary changes that were brought on by or to be made in connection with the North60

Project, including but not limited to those listed in the DEIS, i.e. the addition of a roundabout on Bradhurst Ave. and Hospital Rd., the extension of Hospital Rd. to 9A, and any other specifically referenced changes that are not necessarily on the North60 site, but are improvements/changes needed in the existing roadways near the North60 site that are being made in connection with and as a result of the North60 project.

2. Costs for Offsite Improvements

In connection with the tax impact questions above:

Who is expected to bear the cost of all off-site improvements listed in 1, above?

What are those costs, in the aforementioned question, expected to be?

Is there a way to shift the costs to the North60 developers instead of incurring it by the town, if indeed the town is incurring these costs?

3. Construction Traffic:

I currently live at the top of Belmont Avenue, on Pythian Avenue, and a block from Joyce Place. I am at the literal crossroads for cars and trucks that traverse our neighborhood to get to and from Route 9A and all points north or south from the Hospital, including to the Saw Mill North entrance, for which I believe a majority of those who come this way are either coming from or returning to. Should there be a specific survey conducted to see how best to reduce the traffic in this neighborhood (the only neighborhood bordering this project) as we stand the best chance of being the only neighborhood affected adversely by an uptick in traffic when construction starts?

Is there a way to plan in advance for a reduction/mitigation/re-routing of construction traffic by opening other means for cars and trucks to get on-site before the construction begins, or does the DEIS adequately address how those 1,900 additional construction vehicles will plan to move to and from the construction site and do those plans envision those cars not traversing this neighborhood?

4. Ethylene Glycol and Soil Testing/Remediation:

The DEIS references barrels of ethylene glycol on the site. Will there be soil testing before soil is disturbed in any area of the site, not just the area where the ethylene glycol barrels were discovered? And will the neighbors be shown the results of such test, as well as be warned, if needed, about potential air quality issues when the soil containing any contaminants is disturbed (so we can take precautions)?

5. Controls over other nuisances including air pollution, noise pollution and light pollution:

Does the plan include steps toward mitigation of air pollution in general - from construction dust and debris, and other types of pollution, like noise and light pollution?

Will there be blasting of rock and soil, and will that be done at certain times where the adjoining neighborhood will be warned in advance?

Will there be hours and days (i.e. weekends) when work that creates air, noise and light pollution generally do not happen in order to afford a reprieve from those things?

Will someone be monitoring the noise levels in the neighborhood bordering the North60 site to ensure that the levels do not surpass those in the town ordinances for allowable noise levels, or otherwise create an unlivable nuisance?

Will someone be monitoring the air quality in and around the North60 site for both contaminant levels, as well as any increased pollution so that those with compromised airways can steer clear of the area at certain times? Will those times be made clear to people, i.e. alerts sent in real time?

Will there be a person or committee who interact directly with the neighbors and North60 developers in order to raise and resolve any concerns as they arise?

Thank you for your time and consideration of these questions.

Regards,

Domenick Vita

From: Carolyn Saracino
To: Martini, Gina
Subject: [External] FW: North 60 DEIS comments
Date: Monday, October 5, 2020 1:17:23 PM

Hello Gina, I have received the following Emailed comment for the North 60, please confirm receipt.
Thank you,
Carolyn Saracino
Planning & Zoning
Town of Mt. Pleasant
(914) 742-2327
csaracino@mtpleasantny.com

From: Arline Segal <arlinesegal@optonline.net>
Sent: Sunday, October 04, 2020 6:48 PM
To: Carolyn Saracino <csaracino@mtpleasantny.com>
Subject: North 60 DEIS comments

Carolyn,
I asked the question below at the Public Comment session in September. Please include it in the written record of the questions.
Thank you,

Arline Segal
547 Bellwood Ave
Sleepy Hollow, NY 10591

Q. The DEIS Section 3P states that "*While there will be additional GHG emissions as a result of the Proposed Action, the emissions will be less than a traditional single family subdivision with a similar number of homes due to the location of the Project Site, which reduces the overall amount of vehicles miles traveled*." Given that the DEIS states that development will generate "*…1,854 new trips during the AM Peak Hour and 2,104 new trips during the PM Peak Hour for the Master Development Plan*," and more than 8,500 parking places, can details be provided that demonstrate that the proposed action will actually have lower GHG emissions than a traditional single family residential development?

From: Carolyn Saracino
To: Martini, Gina
Subject: [External] FW: North 60
Date: Thursday, October 15, 2020 4:40:58 PM

Hello Gina, Below is a comment on the North 60 application, please confirm receipt.
Thanks,

Carolyn Saracino
Planning & Zoning
Town of Mt. Pleasant
(914) 742-2327
csaracino@mtpleasantny.com

-----Original Message-----
From: Ashley Pitrulle <apitrulle@gmail.com>
Sent: Monday, October 12, 2020 7:35 PM
To: Carolyn Saracino <csaracino@mtpleasantny.com>
Subject: North 60

I would love to see sidewalks on Bradhurst. People are constantly walking from the medical center down toward the train. It's so dangerous to begin with. By making sidewalks people from the side streets off Bradhurst could walk to North 60, the park, school, Or even town.

Although I think this is great update Mount Pleasant , I think the town of Hawthorne business district could really use the revitalization itself as well.

Thank you for taking the time to read this.

Sincerely,
Ashley Pitrulle

Sent from my iPhone

Mary Hegarty
18 W. Stevens Avenue
Valhalla, NY 10595

Town of Mt. Pleasant Planning Board
One Town Hall Plaza
Valhalla, NY 10595

October 11, 2020

RE: Comments on the North 60 DEIS

Dear Mt. Pleasant Town Planning Board,

Thank you for the opportunity to comment on the North 60 Project, DEIS.

1. The DEIS notes: "The site design employs healthy communities concepts and promotes pedestrian and bicycle circulation including on-site walking trails and a cycletrack. The bike/ped path will promote bike/ped circulation throughout the Project Site."
    a. However nowhere in the DEIS is a "cycletrack" defined. **Can you please define what a "cycletrack" is?**

2. In Figure 2-15, the map shows a "cycletrack" and it is connected to a "street framework with sharrows", and then an arrow which shows it would be connected to the North County Trail. However, in order for this property to have a bike path connected to the North County Trail, a bridge would have to be installed to connect to the North County Trail, so this map does not seem completely accurate, as it look like the property will be easily connected to the North County Trail.
    a. I think it would be great to have a connection from this property to the North County Trail, but I do not understand how the connection will be made?
    b. Therefore, **my question is: how will the bike path shown on Figure 2-15 be connected to the North County Trail?**

3. In Figure 2-15: I understand that a sharrow is a road marking indicating which part of a road should be used by cyclists when the roadway is shared with motor vehicles.
    a. However, **I recommend that instead of a roadway with a sharrow, that instead there be a separate bike/pedestrian pathway throughout the entire property** and also leading to the North County Trail. **I recommend this for safety reasons, so that cyclists don't have to share the road with motor vehicles.**
    b. In Figure 2-15, there is only one section of the entire bike/pedestrian network that is a separate bike/pedestrian pathway (in yellow and is called a cycletrack). There is a mixture of different bike and pedestrian paths:
        i. Street Framework w/Sharrows
        ii. Cycletrack
        iii. Off-Street Bike Path
        iv. Pedestrian Connection
        v. Walking Trail
        vi. I suggest that there be a clearly integrated network of cycle and pedestrian pathways, and that all paths be separate (not shared with motor vehicles), and not the current piecemeal design. I find the current piecemeal network confusing, as

some look like paths for pedestrians only, and some are not defined at all (such as "cycletrack" and "off-street bike path").

4. **In Figures 2-15 and 2-16, the location of the connection to the North County Trail is in different locations.**
    a. **Please clarify this possible error/explain why the connections to the North County Trail are in two different locations.**
        i. In Figure 2-15, the connection to the North County Trail appears on the Northwest corner of the property
        ii. In Figure 2-16 the connection to the North County Trail appears on the Southwest corner of the property.
        iii. **Please clarify this discrepancy.**

5. It is mentioned in the DEIS the following: "The Proposed Action has been designed as a smart growth low impact development, with features that are intended to promote energy efficiency, water conservation, and protection of natural resources. Included in the proposal are special features which may include on-site renewable energy generation in the form of ENERGY STAR appliances and Water Sense fixtures".
    a. **I strongly urge the Town Planning Board to require the developer to DO MORE than just installing Energy Star appliances and Water Sense fixtures!**
    b. **I strong urge the Town Planning Board to require the developer to use geothermal for heating and cooling of ALL buildings, solar panels on rooftops and in parking lots to create onsite power, and to use wind generators (not huge windmills, but small wind generators) to also add to the property's onsite power generation.**

6. **Neighborhood Character:** In our Town's Comprehensive Plan, it frequently states: "to maintain a semi-rural character of our town" and I would like this remembered in the DEIS.

7. **Noise pollution**: Please include a noise study of the traffic and other potential noise issues related to the development.

8. **Light pollution:** Please require the developer to use the latest technology in outdoor lighting, which decreases the amount of diffuse light and has the least impact on the nearby neighborhoods.

9. **Watershed protection and educational opportunities:** This parcel is in the Saw Mill River Watershed.
    a. Please require the developer to consult with the Westchester County Planning Department to understand the County's watershed protection work within the Saw Mill River Watershed in order to decrease negative impacts that this development will have on the health of the Saw Mill River.
    b. Similar to the Yonker's daylighting and public education of the Saw Mill River in downtown Yonkers, I strongly urge the Planning Board to require the developer to highlight and create a public education campaign of the Saw Mill River Watershed by installing walkways/bike paths along the tributaries of the Saw Mill River throughout the entire property, AND to include educational signage along the walkways/bike paths, showing the importance of watersheds and the history and ecology of the Saw Mill River in the Town of Mt. Pleasant. This will give the entire property a "sense of place" and would tie in well with the science educational component of the entire project.

Sincerely,

Mary Hegarty

Jim Collins

Mount Pleasant Planning Board Member
Questions and Comments for North 60 DEIS

October 19, 2020

Long Term Outlook:

- This application outlines that Westchester County will be leasing approximately 40 acres to the applicant for 99 years. At the end of 99 years, three things can happen: Site is re-leased to the applicants company, the site is sold or the site is abandoned. I would like to understand which of the three options are likely at the end of the 99 year term lease and what documentation is supporting that likely outcome?
- Will the lease written by Westchester County to the applicant have provisions that incorporate the Mount Pleasant Planning Board's direction and/or resolution into the lease terms and conditions?
- Will the lease, which includes any Mount Pleasant Planning Board direction and resolutions be transferrable to another lessee and how do we ensure our resolution is enforceable in the event the lessee is no longer a viable entity.
- If all goes as scheduled, this project from start to completion is being built over a 10 year period. How do we ensure the DEIS and EIS is still pertinent in 10 years (e.g. thresholds, traffic, water impact to the environment?)
- The COVID-19 pandemic has created a dramatic shift in the need for office space and also the type of office space to be used:
    - Has the forecast for office space changed as a result of the pandemic?
    - Are there any changes to the design both on the interior and exterior as a result of the COVID-19 pandemic?

Town Park Use:

- Ostensibly, this application will bring an increase of population to the Town of Mount Pleasant. With an increase in population, there will be a need for recreational spaces. Has there been any consideration to include recreational space in the form of Soccer and/or Baseball fields on this site to accommodate the likely need for additional recreational fields?
- Will there be fitness center on site and will there be an opportunity for town Residents to use the facility?

Children's Center:

- Can we define the protocols instituted for the safety of Children in the proposed children's center?
- Will there be school buses visiting the children's and education center? If so, how do we design appropriate drop off and pickup locations for both buses and cars picking up students?
- Will there be a day care facility on site? If so what are the hours of operation?

Tree Preservation and Landscape Protection:

- How do we preserve the northern portion of the project as a natural buffer?
- How can we add native plants and trees to the site in the natural buffer as well as to the greater Grasslands Reservation to replace the trees being removed at the site and improve the bio diversity of the entire Grasslands Reservation?
- How do we incorporate pollinator plants into the site and the greater Grasslands Reservation?
- There are 94 specimen trees documented on site. 67 are proposed to be removed. This equates to 72% of the specimen trees. I would like to understand where those trees are located, understand and document where they will be preserved and understand any opportunity to increase the number of trees to be saved.
- In the nature path is there a plan to remove invasive plantings, install native plants and include educational signage educating the public on the environmental significances in the pathways (e.g. describing significant trees or ecosystem explanation.)

Historical Preservation:

- The DEIS references two archeological sites (Saw Mill River Precontact Site and J. Van Tassel Historic Site.) It states construction activities would occur at the project site impacting the above-mentioned archeological resources. How do we protect the historical significance of the site?
- If we cannot protect the historical significance of the site, how do we memorialize and/or commemorate the history of the site. (E.g. signage on the property, naming a street or some other attempt to preserve the history)
    - Saw Mill River pre contract site
    - Van Tassel Historic Site
- Grasslands Reservation has a Potter's Field Cemetery on the property. The Grasslands Reservation was established to house the poor and established the Westchester County Alms' house. As a result, they also built the Westchester County Alms Cemetery or Potter's Field which is adjacent to the North 60 property. While the Alms Cemetery is adjacent it should be included in the historical significance of the site and ideally some kind of simple memorial placed on the site to preserve it in perpetuity and protected from any future development. There are approximately, 500 people buried on site, preserving the site would be appropriate as part of this application. How do we simply commemorate this adjacent property (stone marker and simple inscription) while preserving it from future development?

Parking:

- Ostensibly, the hospital will continue to charge for parking. North 60 I assume will not be charging employees for parking. How does the blending of paid vs not paid parking work together in a geographically constrained area?
- Is there an opportunity for hospital overflow parking for the hospital on the site?
- For the people who do not work on site, park and engage in the site as members of the community are we charging for parking? Is the property open? Are there set hours for use? Is there going to be a gatehouse?

Roadways/Traffic/Rail/Bicycle:

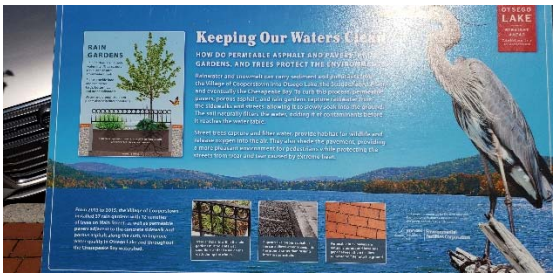
- In the plans the 9A entrance the image cuts off just of the north of the proposed entrance on 9A. Can we get a better view of this entrance and surrounding properties?
- Please define the North County Trailway is located just to the west and bicycle parking will be provided.
    - Where is the North County Trailway in conjunction with the site?
    - What is the mileage to the site from the Trailway?
    - Are improvements to the roads between the Trailway and the site needed to accommodate in increase in bicyclists?
    - Please define how a typical bicyclist would travel to the site from the north county trail way
    - How do we protect bicycles from the weather elements to encourage a safe bicycle storage location?
    - Will charging stations for e-bikes be provided?
- How will the commuter bus to the Hawthorne station be treated as a drop off location? Are any improvements needed at Hawthorne station needed to accommodate bus drop offs?
- Are any other train stations in Mt Pleasant in scope for drop off (Valhalla, Pleasantville?)
- Are we considering a commuter drop off on the Hudson Line as well to the Harlem Line?
- How have the forecasts for rental opportunities been impacted by the Corona Virus pandemic?
- How do we incorporate Rain Gardens into the streetscape to act as a natural water filter? See example from Cooperstown NY
- Are there any opportunities to improve the appearance of the hospital bridge going over the Sprain to the Grassland Reservation to make it more appealing and welcoming to the grasslands reservation?
- The building view from the Sprain Parkway is imposing and removes the green landscape separating the Sprain Parkway with the site. How do we protect the view of the Sprain and other roads to mitigate any distractions from the site for those people driving on those roads? Lighting, View, Buffer, Landscape?
- How do we mitigate traffic for this site impacting residential areas such as Pythian Avenue or Phillip Place?

Sustainability:

- In the DEIS document there was a quote "Solar will be investigated as a potential energy source for some of the energy needs." Please document this effort and what specifically is being researched.
- In Mount Pleasant the Planning Board approved an application for Pepsi that originally started off with Silver LEEDS Certification; however, they were encouraged to look for other green opportunities and submitted plans for Gold level and incorporated even more green standards and more sustainable standards. The question for the DEIS is how do we strive for a higher level of LEEDS certification? What will it take to get to Gold LEEDS certification or higher?
- In addition to LEEDS certification is there a plan to incorporate any other sustainability type certifications as it relates to building and associated building technologies: Specifically, Google in their campuses have also pursued energy and environmental workplace standards, including ISO 140001 (Environmental Management), OHSAS 18001 (Occupational Health and Safety Management Systems) and ISO 50001 (Energy Management Certification) certifications.
- Do we have a measurement of how much energy will be produced on site?
- Can we set up a 200 foot green buffer along the perimeter of the property to protect the view of the surrounding roads and communities?
- How do we incorporate Rain Gardens into the streetscape to act as a natural water filter? **See image example from Cooperstown NY below.**
- Do we have a measurement of how much energy will be produced on site?
- Will the site accommodate cars that need to be charged (e.g. charging stations?) If so how many charging stations will be installed?
- Google at Bayview campus in Mountain View, California they are building a campus that relies on geothermal heat pumps? Have we considered any geothermal for this site?
- Is there an effort to build a healthy office environment by making efforts such thermal comfort, daylight and access to views?
- Are there any forecasted benchmarks for energy and water consumption? If so, how do we measure those benchmarks on an ongoing basis as well as remediate when we are not meeting the established benchmark?
- Is there a plan in place to use sophisticated building technologies to ensure systems are only on when needed.
- Is there any plan in place to treat water on-site for reuse? (Google has incorporated this technology)

RAIN WATER EXAMPLES – COOPERSTOWN, NY

Cooperstown, NY – Rain Garden



Cooperstown NY – Rain Garden Sign explanation (available to pedestrians.)

From: Carolyn Saracino
To: Martini, Gina
Subject: [External] FW: North 60 public comment
Date: Thursday, October 29, 2020 8:25:08 AM

Carolyn Saracino
Planning & Zoning
Town of Mt. Pleasant
(914) 742-2327
csaracino@mtpleasantny.com

From: Barbara Benson <bensonbarb@yahoo.com>
Sent: Wednesday, October 28, 2020 8:36 PM
To: Carolyn Saracino <csaracino@mtpleasantny.com>
Subject: North 60 public comment

I want to address the environmental aspects of the North 60 project. For it to be a truly environmental showcase, this project should embrace geothermal and solar technologies instead of natural gas. These are cleaner, safer, and financially practical alternatives to fossil fuel/natural gas. Renewables are better for our community and for the climate.

The management of the property also should ban the use of pesticides, given the proximity of wetlands.

As well, the developer should reduce the amount of surface parking during construction phases. Once paved, that is land that can no longer mitigate water run-off and heat retention.

This project should fully embrace renewables, green energy, and technology and land-management practices that reduce the impact of climate change.

Thank you.

Barbara Benson
1102-A Bedford Road
Pleasantville, NY 10570

CONSERVATION ADVISORY COUNCIL
STEVEN KAVEE
Chairman
JOSEPHINE DI COSTANZO
CARMEL PROMISEL
STEVEN J. WILLARD

October 30, 2020
To: Town of Mount Pleasant Planning Board
From: Mount Pleasant Conservation Advisory Council
Re: CAC Comment The North 60 Development DEIS, Town of Mount Pleasant.

The Conservation Advisory Council, acting in its capacity to advise on the protection of the natural resources in the Town of Mount Pleasant, offers the following comments on the DEIS for the North 60 proposed development.

The applicant proposes to develop 80 acres of land including approximately 60 acres of vacant land within the County's Grassland Reservation. A total of 3 million square feet of mixed bio-tech, medical, office, commercial, hotel, residential and other related use is proposed. The project will result in the removal of 1374 trees of at least 10" dbh including 94 specimen trees of which 20 are in good condition and will add 604 trees. The applicant has specifically defined the project as one using "sustainable strategies" "in every area" and in public presentations, offered a summary of forward thinking "smart growth" planning with a live/work, "healthy" development with walking paths; intermodal transportation connecting the site with mass transit and existing bike paths; incorporating natural features; and using "green infrastructure" and green building "design elements."

These are all commendable in concept. The project though does have a number of significant environmental impacts including construction on steep slopes, wetlands disturbance, stormwater management from millions of square feet of new buildings, treatment of wastewater from bio-tech and medical offices and the social impact on the nearby hamlets with a Town master plan underway that is intended to increase the potential for residential and commercial development.

The DEIS addresses these issues and the Council notes positively that sustainability, habitat assessment and retaining habitat corridors, use of native plants, impact from herbicides and other chemicals are included. It is important and integral to a completeness that the DEIS is more specific in some areas and includes alternatives, additional mitigation and enhanced sustainable features.

In many instances the more aspirational word "may" is used rather the definitive "will." This less clear direction appears in the discussion of renewable energy, green infrastructure and landscape management, features that mitigate impacts and will benefit from a clearly defined commitment to sustainable development and establish clarity on environmental impacts consistent with the stated Smart Growth intentions of this large scale proposal as the project move through site plan review.

The Council offers the following comments on specific items in the DEIS.

Open Space
"More than 36.5 acres (46.3 percent) of the Project Site will be preserved as open space" which includes the restoration of two streams, tributary to the Saw Mill River. Other areas will be landscaped active or passive space. The applicant suggests that if "space such as courtyards, landscaped building perimeter areas, medians, and sidewalks [were] included in the open space calculations… these areas would bring the percentage of open space out of the total site area to approximately 78.9 percent."
These other areas are not open space and do not provode the habitat value of woodlands or other multi acre vegetation. Depending on a variety of factors, they may be more accurately called green space if the size is below the threshold of acres required for diverse wildlife habitat or are surrounded by structures and

continued

impervious surfaces. Even the restoration and maintenance of an existing riparian corridor may be a development amenity if it is surrounded by paved walkways, roadways and large buildings unless it is designed to provide habitat values and the ecological services with well maintained native vegetation.

Transportation
The DEIS proposes Sharrows bike lanes. These pavement markings do not provide the safety of a curbed defined bike lane that would more likely encourage riders to be confident in the use of bicycles into and through the site. Electric charging stations for bikes should be included. Shuttle service with *multiple stops* rather than the "limited" stops proposed and regular *off peak service* to train stations, in addition to the peak hours only, using electric vehicles is recommended and parking should include electric car charging stations. The massive parking proposed would seem to encourage the use of individual cars rather than public transportation.

Green Infrastructure and Green Building
The applicant states that "some buildings are envisioned to have green roofs to aid in storm water management and to reduce impervious surfaces." It is unclear what "envisioned" means and whether this is a commitment for this valuable feature or a dream that may or may not be fulfilled.
The DEIS states that the project in both Phase 1 and the Master Plan will be capable of obtaining Leed Silver certification. While LEEDS Silver is a good standard, the Council suggests the applicant could exceed this lowest of the top 3 LEEDS tiers.
The project is also described as including "operational practices … sustainable and environmentally friendly...as required by applicable building codes." Current "applicable building codes" are not likely to approach the best practices envisioned among proponents of sustainable growth. The qualification of "current applicable building codes" is a low bar that could limit the opportunities for the growth and development model the applicant has stated is their goal.

Energy and Sustainability
Renewable energy should be more clearly developed and defined. Specifically the DEIS states that "solar energy will be investigated as a possible energy source for some of the needs." Locations for the "investigation" of solar should be noted. In particular the massive pave parking area in Phase One could be an ideal location for solar generation. Solar orientation for the buildings can be a positive energy saving measure and can be combined with solar energy generation.
Other renewable energy options are not discussed including wind that has become a more efficient option. Geothermal heating should be reviewed as well however the Council has some concerns about the environmental impact on this technology that requires a thoughtful review.

Natural Resources
The use of xeriscaping, bio-swales and pervious pavement to promote rainwater infiltration is positively noted as well as the wetlands restoration and the addition of native understory vegetation along the remaining woodlands edges.
The DEIS states that the use of pesticides and fertilizer will be "minimized." There are well established practices that provide best management without the use of pesticides and fertilizers and would be consistent with the sustainability goals of the project.
Native vegetation should be incorporated into all landscaping. A minimum 70% of the landscaping should include native plants, trees, shrubs, grasses and other vegetation in order to achieve the threshold required to provide ecological services to benefit birds, beneficial insects, pollinators and other wildlife.

Recycling and Waste
A significant amount of food and other compostable waste will be generated from this project yet composting is not mentioned in the DEIS. Composting will reduce the impact on the waste stream, provide an educational component for the Science Center and can be used in the landscaping maintenance.
The Council has concerns about medical waste in the municipal sewer system. Current guidelines offer little in ways to control or reduce this material which in many cases may go directly into the municipal system untreated. Careful review and consideration of this impact should be studied.

Continued

Alternative C
The increased residential units in this alternative would provide the live-work element considered a critical component of smart growth developments. The walkable village with retail, residential and work areas reduces car and other vehicle traffic and subsequent emissions as well as providing a healthy life style in a walkable environment. In addition it would provide options for much needed affordable housing.

Yours truly,

Steven Kavee
Conservation Advisory Council, Chair

BUSINESS COUNCIL WESTCHESTER
Build. Connect. Win.
thebcw.org

800 Westchester Avenue
Suite S-310
Rye Brook, NY 10573
p: 914.948.2110
f: 914.948.0122

October 1, 2020

Michael McLaughlin, Chairman & Members
Town of Mount Pleasant Planning Board
One Town Hall Plaza
Valhalla, NY 10595

Dear Chairman McLaughlin and Members of the Board:

For many years, the Business Council of Westchester has strongly supported the efforts to create a vibrant biotech/bioscience and research center on the North 60 property in the Town of Mount Pleasant. As Westchester's leading business membership and advocacy organization, we have seen the unique potential this site holds. The synergies with the Westchester Medical Center, New York Medical College, Pace University and Westchester Community College, the immediate proximity to Regeneron, the central location in the Metropolitan area, the multiple transportation options and the strong interest and growth of the bioscience, biotech and related research field, combine to present an unparalleled opportunity for economic success for the town, the county, the state and the region.

We recognize and respect the extensive time and effort the Planning Board has invested in assuring that a plan with the scope and impact of the North 60 (plus 20) has been carefully evaluated and assessed and that community input has been a part of the review from the start. This long-term concept and investment deserve the thoughtful consideration you are providing for the town and, in a real sense, for the greater Westchester community.

As we have watched the North 60 emerge since it was first conceived by John Fareri, an individual who has done so much for Westchester not only as a business leader but through his unwavering philanthropic commitment to the creation and ongoing success of the Maria Fareri Children's Hospital. John is a visionary who has the ability and dedication to see his concepts become realties. For more than a decade he has pursued the dream for The North 60 and at last, thanks in no small measure to the hard work of your board and the leadership of the Town Board's, the dream is near reality.

As the plan for the North 60 has evolved, the subject of including a housing component keyed to those working at the future North 60 facilities as well as those working at the Medical College, Medical Center, Regeneron and other related facilities has been raised. In-depth studies and economic analyses conducted for the county and others, have all identified this as a crucially important need that would immeasurably enhance the overall project. We have studied this option, as well, and concluded that creating small apartments geared to serving medical, research and other personnel would significantly enhance the project. From discussions with our members including Regeneron, the Medical Center, and the Medical College, among others, we have found a universal call for inclusion of this form of housing.

Because of the design and size of the apartments, there would be few if any children living there, therefore having virtually no impact on local schools.

We recognize that the inclusion of housing is included as an alternative to in the Environmental Impact Study you are conducting. As the Planning Board continues the final phases of your review of the North 60 plan, we would like to extend our strong support for the inclusion of a housing component geared the North 60 and neighbors as described above. We believe this workforce-oriented housing is much needed and can be comfortably accommodated within the overall plan.

Again, thank you for your ongoing efforts to at last bring The North 60 to life. Please feel free to contact us at any time to discuss this further and let us know if we can be helpful to the board in any way.

Sincerely yours,

Marsha Gordon
President and Chief Executive

John Ravitz
Executive Vice President and Chief Operating Officer

Carolyn Saracino

From: Sarah Miles Smiley <sarahsmiley28@gmail.com>
Sent: Sunday, November 01, 2020 5:16 PM
To: Carolyn Saracino
Subject: North 60 DEIS comments

Dear Mt. Pleasant Planning Board,

I spoke at a public hearing on The North 60 project, and am submitting some additional comments here.

Given that gas is now understood to be a major contributor to global warming, and NYS climate policy (the 2019 Climate and Community Protection Act) will necessitate the phase-out of gas over the next 30 years, why does the developer plan to use interruptible gas instead of renewable heating technologies such as ground source heat pumps?

The DEIS states that the project is not expected to significantly impact regional greenhouse gas emissions, but that seems hard to believe considering the size and scope of the project and the plan to combust fossil fuels on-site. What is the basis for the developer's assumption? Have they calculated the potential GHG emissions including the methane from gas (and backup oil)? New York State now requires that policy makers account for methane when calculating greenhouse gas emissions, and the developer should do so as well.

The DEIS also makes a misleading statement that "natural gas emits the least amount of carbon dioxide emissions compared to other fuel types such as oil or coal." This ignores the fact that methane leaks from gas infrastructure are 86 times more potent than carbon dioxide at trapping heat in the atmosphere (hence the change to NYS policy mentioned above). Additionally, methane leaks threaten wildlife (including trees), water quality, and carry the risk of explosions.

Ground source heat pumps (aka geothermal) utilize the steady temperature underground by circulating warm air into buildings in the winter and cool air into the buildings during the summer, without combusting fossil fuels, and avoiding the need for air conditioning. Geothermal is more efficient than gas or oil, and the heat pumps run on electricity that can leverage renewable energy generation like rooftop solar. Installing geothermal at the time of construction can be more cost effective than installing conventional HVAC, and there are generous incentives available from NYSERDA and Con Ed. Induction stoves (run with electricity) are a cleaner, healthier alternative to cooking with gas, which emits toxins that impact indoor air quality.

Building out local gas infrastructure for this development does not make sense when the state is phasing out the use of gas. Ratepayers will be stuck paying the bill for pipes that will become stranded assets by the time the project is finished. The developer is proposing "interruptible" gas because the utility's gas moratorium prevents access to 'firm" gas service. The moratorium is a result

of gas pipelines being rejected and the state policy shift toward renewable thermal systems. Why build a large, new development with an unreliable fuel source?

The North 60 proposes to be innovative, community-oriented development focused on technology and healthcare. I urge the developers to consider non-fossil fuel technology that will significantly reduce the project's climate impact, and protect our natural resources, public health, and future generations. We are at a critical juncture for reducing our current use of fossil fuels; we cannot afford to add to it at the scale of this development.

Thank you for your consideration.

Sarah Smiley
5 Farrington Avenue
Sleepy Hollow
--

Carolyn Saracino

From: Katherine Meladossi <mellov6@yahoo.com>
Sent: Sunday, November 01, 2020 4:35 PM
To: Carolyn Saracino
Subject: Draft Environmental Impact Statement for the North 60

Dear Ms. Saracino,

My name is Katherine Meladossi and I reside at 21 Thomas Place in Valhalla.

I have been a resident of Valhalla for over 40 years and have had the pleasure of raising 4 children in this beautiful area. I am also blessed to have 6 grandchildren that all reside within 10 minutes of the town of Mt. Pleasant.

I have been a teacher and director of a local preschool for over 25 years so the health of well being of this generation and future generations is at the essence of my soul and at the heart of my values.

My concern surrounding this project centers on the climate and therefore health impact. Has the developer calculated the climate impact of using gas for this project? Can the developer use renewable heating alternatives such as geothermal (clean energy instead of dirty fossil fuels)? Geothermal is also a more advanced technology and there are significant incentives for the developer.

This is a tremendous, long term project whose basis is centered on creating research and lab facilities to promote the health and well being of this and future generations.

It only seems logical and responsible to have the energy source for such an undertaking be in alignment with a positive and beneficial impact on current and future generations.
By requiring the use of clean/geothermal energy for this project, we have the opportunity here to be part of something profound and historic and to pave the way for future developments.

Your kind consideration is greatly appreciated.

Sincerely,

Katherine Meladossi

Sent from my iPad

Carolyn Saracino

From: Peter Curtin <pcurtin2@verizon.net>
Sent: Sunday, November 01, 2020 10:47 PM
To: Carolyn Saracino
Cc: rcurtin23@verizon.net
Subject: North 360
Attachments: North 360 Concners.docx

Hello Carolyn,

Attached is a letter from my wife, Rita and I regarding our concerns for the North 360 project.

Thank you,

Peter

To the Mount Pleasant Planning Board,

We are residents of the town of Mount Pleasant, living in Hawthorne, very close to the North 360 project. Our concerns are the following: we are genuinely concerned about increased traffic through our neighborhood as traffic is already very heavy during rush hour periods as a result of those working at the Westchester Medical Center and 19 Bradhurst Ave medical facility. Are request is NOT to have a traffic light at the end of Belmont Road and the Saw Mill River Road but a either a one way out sign or a no thru traffic sign preventing traffic from going into this residential neighborhood.

Additionally, a request for the same at West Stevens Ave and Old Saw Mill River Road.

Pythian Ave is used by the young and old alike as a street for walking from the early hours to late in the evening because it is a relatively flat road. Mothers pushing strollers, senior citizens out power walking and children bike riding is common. Proof of that statement come during a typical Halloween night to see the volume of walking traffic it gets because it is considered level for the most part. It is a matter of time before someone gets hits by a car at the corner of Belmont Road and Pythian Ave because the high-volume traffic does not stop for the Stop sign. You are aware of what happened across from Gordo's Restrauant on Elmwood Ave and Commerce Street, a pedestrian was struck a few years ago. We do not want that to happen again here. We are also requesting a one way sign out on Joyce Place and Bradhurst Ave so no thru traffic comes into this residential neighborhood.

In following this request, you would be directing traffic on Bradhurst Ave and on Saw Mill River Road to go around the neighborhood in its entirety to Broadway and Brighton ave. We need to stop what is currently a cut thru from 9A to Bradhurst in this residential neighborhood. Please remove the double yellow lines on Joyce Place, Pythian Ave and Belmont Ave and keep this neighborhood safe.

With all plans in place, how can we ensure that the flow of traffic does not use this area as a cut through, which could be potentially hazardous to our neighbors?

How are you planning on dealing with the increase in traffic as a result of this project to Bradhurst Avenue? And keeping it out of the residential neighborhood?

We are concerned also about the increase in noise pollution and light pollution that will be evidence as a result of the North 60 project. Many studies show that noise and light pollution can be harmful to humans as well as animals. How are you planning to alleviate the noise and light pollution that this project is bound to have on our community? We do not want what currently exist on the Westchester Medical Center, a light bar along the outline of the top and side of the building facing our neighborhood. It emits too much light. Will you please not allow it to happen again with North 360?

Lastly, we are concerned about the environmental impact of this project. How are you planning on dealing with the increased amounts of carbon dioxide and methane on our air and water? What plans are there for forestry? Tall tree plantings? Etc, to beautify our neighborhood.

Thank you for addressing these concerns.

Peter & Rita Curtin

121 Pythian Ave

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Memorandum

To:	Mr. Michael McLaughlin Town of Mt. Pleasant Planning Board Chairman
From:	Carlito Holt, P.E., PTOE
Subject:	DEIS Technical Review Westchester BioScience and Technology Center Town of Mount Pleasant, Westchester County, New York
Date:	October 30, 2020
Project No.:	19-012

Provident Design Engineering, PLLC (PDE), a licensed Professional Engineering Firm in the State of New York, has performed a Technical Review of the Draft Environmental Impact Statement (DEIS), prepared for the proposed North 60 Westchester BioScience and Technology Center to be located in the Town of Mount Pleasant, Westchester County, New York. More specifically, PDE reviewed the following Sections of the DEIS:

Section 3.D – Topography and Slopes
Section 3.G – Stormwater Management
Section 3.H – Utilities (Except Water)
Section 3.I – Traffic and Transportation
Section 3.Q - Construction

The following outlines the PDE's comments on the respective sections of DEIS:

D. TOPOGRAPHY AND SLOPES

1. §180-8F of the Town Code requires steep slopes and other related contour data on plans at a scale not less than 1" = 50'. For the Phase 1 Site Plans, the areas of proposed disturbance/potential impacts to steep slopes by category are currently shown on the Grading Plan Key Map (Drawing GP-1), which is at a scale of 1" = 80'. Since obtaining Site Plan Approval and Steep Slope Permit for Phase 1 is part of the Proposed Action, the areas of proposed disturbance/potential impacts to steep slopes by category shall be clearly delineated and quantified on the 50 scale Grading Plans (Drawings GP-2, GP-3, and GP-4) as a matter of compliance.

2. In order to allow for a more detailed evaluation by the Lead Agency of potential impacts and mitigation required for compliance with Chapter 180, the following additional information

associated the proposed steep slope disturbances shall be provided in narrative and/or graphic form as part of the Phase 1 Site Plans, as required by the applicable subparts of §180-8:

- Estimated quantities of excavation and/or fill;
- Number, species and size of trees to be removed;
- Cross sections of the proposed steep slope disturbance areas showing existing and proposed grade lines;
- Details (sections & elevation views) of the proposed retaining wall system(s) to be constructed where shown (see also Comment D.3.a.1 below).

3. The cut and fill analysis for Phase 1 stated that "The additional material shall be stockpiled and stabilized onsite to be used during future phases of development on the Project Site." The location(s) and dimensions of the stockpile(s) shall be shown on the Phase 1 Erosion Control Plan (Drawing EC-1) to determine any potential impacts and mitigation requirements.

4. In PDE's opinion, a few of the statements made in the DEIS on how the Proposed Action shall adhere to/meet the standards in §180-7 of the Town Code, particularly Standards B1, B3, B9, B11, B17 and B20, are not backed with sufficient analysis or study in the DEIS to demonstrate adequate avoidance and/or mitigating of the impacts of steep slope disturbance, as further clarified below:

    a. The Proposed Action (both Phase 1 and the Master Plan) relies heavily on the construction of large retaining walls and, with the exception of the side slopes within the various stormwater management basins, solely on the use of graded slopes (cut or fill) of one vertical to two horizontal. Examples:
        - Proposed West Street between Stations 13+50 and 22+50 would require cuts of up to thirty (30) feet deep through very and excessively steep slopes, and construction of a 2-tier retaining wall with heights of up to 12 feet and a one vertical to two horizontal backfill slope (typically the most severe in terms of impacts on the wall's structural stability) of between 30 and 40 feet in height. Furthermore, construction will be within Paxton soils between 15-25% slopes (PnD) which, based on the NRCS soils data provided in Chapter 3C, has a seasonally high perched groundwater table, severe erosion potential, and severe limitations (requiring special or alternate design) for local road and street construction due to slope.
        - Although the associated proposed steep slope disturbance is minor, construction of the western perimeter of the West Parking Lot between Buildings B1 and B4 would require construction of a retaining wall up to 20 feet in height within Ridgebury soils (RdB) that have a seasonally high perched groundwater within 1.5 feet of the surface and moderate to severe limitations for building (structure) construction due to wetness and slope.
        - Construction of proposed Buildings B10 and B12 (Master Plan) requiring fill between 2 and 10 feet deep within steep and excessively steep slopes of Paxton soils, with constructed one vertical to two horizontal fill slopes up to 20 feet high above steep and very slopes.

The overall feasibility of constructing these Project elements in terms of bearing capacity and global stability of the impacted soils, the presence of rock, and recommendations on mitigation measures such as construction and fill compaction methods, retaining wall design parameters, drainage/groundwater controls, and the need for permanent stabilization and protection of constructed one vertical to two horizontal fill slopes through the use of turf reinforcement mats (TRMs), would be addressed through a geotechnical boring and test pit field program and report prepared by a licensed geotechnical/soils engineer.

A geotechnical program and report are not included in the DEIS and shall be provided as required by §180-8N of the Town Code.

b. In addressing Standard B1, the DEIS states, "The only way to construct this roadway (i.e. West Street as discussed in D.3.a.1 above) is to cut through the existing steep slope area on the northern side of the Project Site." The West Street alignment between Stations 13+50 and 22+50 will have the Proposed Project's greatest impact to very and excessively steep slopes on the Project Site, with its proposed connection to Route 9A bisecting the Old Saw Mill River Road Extension and cutting off the southern access to West Stevens Avenue from Route 9A.

While there is no portion of the northern Project site frontage that does not contain steep slopes, the Applicant should provide a drawing/figure showing an alternate alignment for West Street that parallels the existing paved driveway which connects to Route 9A and Old Saw Mill River Road. Such an alignment would have the potential to greatly reduce the impact to the steep slopes.

5. In PDE's review of the Erosion Control Program/Erosion Control Notes provided in the Phase 1 Site Plans (Drawing D-4) it was determined that the wording of standards B12, B13, B14, B15, B18, and B19 in §180-7 of the Town Code was essentially copied over as notes. PDE recommends that whatever was provided meet the stricter requirements of either the SPDES Construction Stormwater General Permit (GP-0-20-001) or standards B12, B13, B14, B15, B18, and B19 in §180-7 of the Town Code.

The DEIS and the SWPPP correctly state that "the Project Site discharges to the Saw Mill River (Middle and tribs) which has been identified as a "303(d) Impaired Segment by Construction Related Pollutant(s)" in Appendix E of the NYSDEC SPDES General Permit GP-0-20-001. As such, Part I.B.1.b. of GP-0-20-001 requires for construction sites that *directly discharge* to one of the 303(d) segments listed in Appendix E that the application of soil stabilization measures must be initiated by the end of the next business day and completed within seven (7) days from the date the current soil disturbance activity ceased. This requirement is stricter than standards B13, B14, and B15, and shall be incorporated by note into the Erosion Control Program (specifically the Erosion Control Notes) on Drawing D-4 as the benchmark for the implementation of temporary

and permanent soil stabilization measures/practices.

The following Erosion Control Notes shall be either revised accordingly (Nos. 4 and 11) or deleted (Nos. 5 and 12). Notes Nos. 10, 13 and 14 (mimicking §180-7 Standards B12, B18 and B19, respectively) shall remain, and a new note shall be added that modifies Standard B13 by not allowing disturbance of existing ground cover to take place more than seven (7) days prior to grading and construction.

Please refer to Section G, Stormwater Management below for additional technical comments on the Phase 1 Erosion Control Plan, Erosion Control Details, Phasing Plan and SWPPP.

G. STORMWATER MANAGEMENT

1. General

Technical review and comments for Section 3G focus on the Stormwater Pollution Prevention Plan (SWPPP) prepared for Phase 1 (DEIS Appendix G), and its conformance to the construction and post—construction technical requirements/standards as referenced in the SPDES Construction Stormwater General Permit (GP-0-20-001) and Chapter 183 of the Town of Mount Pleasant Code. As part of/supplemental to the SWPPP, review also includes the Phase 1 Site Plans, specifically the Grading (with Drainage), Erosion Control, and Phasing Plans, and; Details and Notes, specifically those related to erosion and sediment control, sw well as stormwater management.

The SWPPP contains a significant number of technical deficiencies as detailed in the specific comments below. Since obtaining Site Plan Approval for Phase 1 is part of the Proposed Action under SEQRA, the comments/deficiencies must be addressed under SEQRA, which includes the SWPPP and Site Plans as Appendices. Review and approval of the project SWPPP is also required by the Town of Mount Pleasant as the traditional land use control MS4 entity defined in GP-0-20-001 prior to or as a condition of granting Site Plan Approval.

Section 1.1 of the SWPPP shall be revised to include an enhanced discussion and proper documentation from DEIS Section 3L and DEIS Appendix I demonstrating eligibility under GP-0-20-001 based on no impacts to historical properties, in accordance with Part I.F.8 of the General Permit.

It is also important to note that, based on the information provided in Section 3F (Wetlands, Waterbodies and Watercourses) of the DEIS, the Proposed Action will have direct impacts to Wetland #1/Watercourse W1 and Wetland #2/Watercourse W2, which fall under the jurisdiction of the New York State Department of Environmental Conservation (NYSDEC) and the US Army Corps of Engineers (USACOE). These activities will require obtaining the following NYSDEC permits subject to the Uniform Procedures Act ("UPA") per 6 NYCRR Part 621:

- Article 15, Title 5 Stream Disturbance Permit for the direct impacts to Wetland #2/Watercourse W2, and;
- 401 Water Quality Certification (obtained through the Joint Permit Application with the USACOE for a Wetland Jurisdictional Determination and Nationwide Permits.

The above regulated activities and required permits shall be stated in the SWPPP. In accordance with Part II.C.2.b of GP-0-20-001, the Owner/Operator (Project Sponsor) will be required to submit the SWPPP to the NYSDEC Region 3 Office for review at the time all other necessary UPA permit applications are submitted. The NYSDEC will require per Part II.C.2.b that the SWPPP include sufficient information to demonstrate that the activities under the Proposed Action qualify for authorization under GP-0-20-001. Since the NYSDEC is also listed as a SEQRA Involved Agency for the Proposed Action, it is likely that will also have separate comments on the SWPPP's conformance to GP-0-20-001 per Part II.C.2.b.

The following are detailed comments:

1. Comments on Erosion & Sediment Control

   a. The Erosion & Sediment Control Plan does not show any measures for controlling groundwater and surface water runoff/run-on during construction. The measures – those found in Section 3 of the *New York State Standards and Specifications for Erosion and Sediment Control* ("Blue Book") – are essential components for capturing and conveying sediment-laden runoff to sediment basins/traps prior to storm drainage installation, and/or to minimize erosion by intercepting and diverting surface runoff away constructed slopes. The E&SC drawings shall be revised to show the locations and details of runoff control and dewatering measures from Section 3 of the Blue Book to be implemented. The construction sequencing on the Phase 1 Phasing Plan and in Appendix L of the SWPPP shall also be revised to provide more detail of the timing to install such measures in relation to the timing of the earthwork/grading operations and drainage system installation.
   b. The Erosion & Sediment Control Plan shows only stormwater basin SWP-3 to be used as a temporary sediment basin, yet the construction sequencing calls for the use of stormwater basins SWP-1, SWP-3, and SWP-4 as temporary sediment basins. Notwithstanding the separate prohibitions in Chapter 6 of the *New York State Stormwater Management Design Manual* (NYSSMDM) on using an infiltration basin (SWP-3) as a sediment control device and locating a stormwater basin/pond (SWP-4) with jurisdictional waters, including wetlands (see Comments 2.c and 3.b.1 below), the Phase 1 SWPPP and Site Plans do not include any design details or supporting design calculations for the basins as required by Sediment Basin Standard and Specifications in the Blue Book. Such details and calculations shall be provided.
   c. The required elements in Section 6.3.6 (Maintenance) of the NYSSMDM do not allow the use of infiltration practices as a sediment control device. An alternate sediment

trap/basin/control device location other than SWP-3, preferably upgradient/upstream, shall be provided. In addition, Section 6.3.6 requires the E&SC plan to clearly indicate how sediment will be prevented from entering SWP-3 and the other infiltration facilities.

d. In general, any calculations (hydrologic/hydraulic) required to support the design/sizing of E&SC measures/practices shall be included as a separate Appendix in the SWPPP.
e. Temporary stockpile areas are generically depicted on the E&SC Plan without any clarification/differentiation on which areas will be designated for topsoil only vs. those for earth/soil. The construction sequencing on the Phasing Plan specifically states within each Phase where topsoil is to be stockpiled, but in many cases the specified locations are not graphically shown on the E&SC Plan. Furthermore, with the exceptions of Phases 1D, 1F, and 1J, the sequence states for the remaining Phases that excess cut/fill earth material from project earthwork operations be either brought to/taken from the stockpile area located in the Phase 1A staging area. Therefore, two separate, designated stockpile locations – one for topsoil, one for earth material – shall be shown within the Phase 1A area on the E&SC Plan.
f. Given the estimated significant quantities of excess cut materials proposed to be generated by the earthwork operations in Phases 1B (68,400± cy) and 1H (100,000± cy) and be stockpiled in the Phase 1A staging area per the sequencing, the E&SC Plan shall accurately depict the extents (i.e. dimensions) of the stockpile area required based on "worst-case scenario" in terms of the maximum amount of excess material anticipated. As perspective, taking the estimated excess quantities above as a range and assuming a maximum stockpile height of 15 feet, the required stockpile surface area at mid-height would range between 123,000 sf (2.8 ac.) and 180,000 sf (4 ac.). Based on the proposed Phase 1B and 1H construction areas of 4.8 acres and 3.9 acres, respectively, accurately showing the stockpile area required is necessary to determine if there is a potential of exceeding the five (5) acre maximum disturbance threshold.
g. The sequencing narrative for Phase 1I includes what may be an improper reference as follows: "ALL EXCESS MATERIAL RESULTING FROM PHASE 1F EARTHWORK OPERATIONS SHALL BE STOCKPILED IN LOCATION SHOWN HEREON WITHIN LIMITS OF PHASE 1F." Please verify the accuracy of this reference and revise if necessary.
h. With respect to stabilizing disturbed areas, the sequencing narratives for each Phase include a step for stabilizing with topsoil, seed and mulch in accordance with the seeding specifications provided on Sheet D-4. However, most of the Phase areas have proposed slopes steeper than 3 horizontal to 1 vertical, requiring the use of erosion control blankets as specified in the SWPPP. The sequencing steps shall be revised to include stabilization with erosion control blankets where required. The Applicant's engineer should also consider graphically showing the areas of proposed erosion blanket stabilization on the E&SC Plan.
i. A "generic" rock outlet protection (riprap) detail is provided in Drawing D-1, but no apron designs (dimensions, stone gradation, etc.) are shown for any of the pipe outlets, either in tabular form or graphically on the E&SC Plan. The detail shall be revised to include the design data for each outlet apron in tabular format, with supporting calculations provided

in the E&SC calculation appendix. In addition, the outlet aprons shall be graphically shown on the E&SC Plan, with the limits of disturbance (LOD) line(s) (and areas) adjusted to show the aprons within the LOD.

j. Silt fence is shown on the E&SC Plan located downstream of pipe outlets and perpendicular to flow. The use of silt fence in this manner, as a check dam, is not acceptable standard in the Blue Book. Where required and feasible, the E&SC Plan and Details shall be revised to provide/show check dams or outlet protection conforming to the Blue Book standards.

k. There are several locations of silt fence, for which installation requires disturbance, shown on the E&SC Plan outside the Project LOD. The Plan shall be revised by either moving the silt fence to the LOD or adjusting the LOD (with corresponding LOD area adjustments) to the shown fence locations.

l. What method(s) will be used to define the LOD in the field? Typically, limits are defined by perimeter fencing (silt fence at the downgradient/downslope limits, HDPE/PP construction fence at upland limits). Please specify the method(s) and indicate on the plans.

m. The E&SC Plans and the SWPPP do not provide any specific measures to be implemented to protect/mitigate impacts from construction activities within wetlands and watercourses. The Mitigation Measures part of Section 3F states, "A detailed water handling plan would be implemented. This plan would include the rerouting of clean water around construction activities and would include the treatment of impacted water that would be pumped from construction areas." These plans/measures are an important aspect of the Project construction and shall be provided on the E&SC Plans and incorporated into the construction sequences of the impacted Phases in the Phasing Plan and SWPPP.

n. The "silt fence drop inlet sediment filter" detail on Drawing D-4 is not equivalent to the Fabric Drop Inlet Protection detail (Figure 5.32) in the Blue Book; the silt fence fabric is not backed/supported by a 2 x 4 wood frame. The detail on the drawing shall be replaced with the Figure 5.32 detail. The Applicant's engineer should also consider adding another type on inlet protection for inlets located in paved areas.

o. The following E&SC details are not included and shall be added (in addition to those called for in the above comments):
   - Concrete Truck Washout (with locations shown on the E&SC Plan);
   - Water Bars (see refer to Comment 2a above), and;
   - Erosion Control Blanket installation.

p. While there is a reference in the "Soil Restoration Notes" on Drawing D-4 to the techniques in Chapter 5 of the NYSSMDM, it should specifically reference Section 5.1.6 of the SMDM. In addition, the Soil Restoration Table (5.3 in SMDM, 4.6 in Blue Book) shall be added to the drawing so all potential soil restoration methods are available and easily accessible to the contractor. If there will be areas where full soil restoration is required, then the six-step specification on Page 4.52 of the Blue Book shall be included.

q. In addition to the revisions requested in Comment D5 above, the "Erosion Control Program/Erosion Control Notes" provided on Drawing D-4 should be consolidated into a

single set of cohesive notes. Stabilization/seeding notes that conflict with the "Critical Area Seeding Specification" (or vice versa) should be revised or deleted to eliminate confusion.

r. As stated in Comment D5 above, the DEIS and the SWPPP correctly state that "the Project Site discharges to the Saw Mill River (Middle and tribs) which has been identified as a "303(d) Impaired Segment by Construction Related Pollutant(s)" in Appendix E of the NYSDEC SPDES General Permit GP-0-20-001.

Part IV.C.2.b. of GP-0-20-001 requires for construction sites that directly discharge to one of the 303(d) segments that the Qualified Inspector shall conduct at least two (2) site inspections every seven (7) calendar days, and that the two (2) inspections shall be separated by a minimum of two (2) full calendar days. This requirement shall be explicitly stated in Section 4.0 of the SWPPP and as part of the "Erosion Control Program/Erosion Control Notes" to be revised as commented above. The revised SWPPP and Notes shall also state that the Qualified Inspector shall prepare an inspection report subsequent to each and every inspection in accordance with the requirements of Part IV.C.4.

2. Comments on Stormwater Management

a. Required Water Quality Volume (WQv) and Minimum Runoff Reduction (RRv_{min})

1. The WQv and RRv_{min} in Appendix B have been computed for the overall Basin A and Basin B areas, as summarized in the "Summary of Runoff Reduction Volume" table at the bottom of Page 13 of the SWPPP. However, note that the sum of the Basin A and Basin B WQv (95,806 cf) is less than the sum of the WQv Required values to each SW Practice (98,797 cf) for the Project as shown in the "Summary of Water Quality Volume" table at the top of Page 13.

The above demonstrates that the target WQv and RRv_{min} for the Project must be calculated to each Design Point as the sum of tributary volumes from each of the sub-catchment area(s). Revise the calculations and the summary table in the SWPPP accordingly.

2. The RRv_{min} in Appendix B for the overall site and for drainage areas tributary to Practices Infiltrator System 2 (INF-2) and Infiltration Basin #1 (SWP-2) have been computed using the Specific Reduction Factor (S) value of 0.30, based solely on soils of Hydrologic Soil Group (HSG) of "C". However, there are post-development tributary areas – A5 to INF-2 and A10 to SWP-2 – that will also have new impervious surfaces constructed over soils – Ridgebury loam (RdB) - that are classified HSG "B" in the drained condition. The S value for HSG B soils is 0.40.

The RRv_{min} calculations above shall be revised using a "weighted" S value based on the breakdown of HSG B and C soils to more accurately determine the RRv_{min} to be captured.

3. The post-development HydroCAD model shows sub-catchment area Post A8 containing 10,280 sf of paved (impervious) area (the proposed loading zone adjacent to Buildings B1 and B2), which appears by the plans to be directly discharging to Wetland #1/Watercourse W1 by overland flow without passing through a WQv/RRv practice. A similar condition is shown for sub-catchment area Post A1, with runoff from 7,300± sf of proposed West Street directly discharging to Design Point A without water quality treatment/runoff reduction. These sub-catchment areas need to be accounted for in the WQv and RRv_{min} requirements for the Project, including proposed SMP designs for mitigation.

b. SMP Designs

1. The Required Elements of Section 6.1.1 in the NYSSMDM states that stormwater ponds shall not be located within jurisdictional waters, including wetlands. Proposed SWP-4, will directly impact existing Wetland #2/Watercourse W2, eliminating 1,300 linear feet of existing stream and 14,000 square feet (0.32 ac.) of wetlands. The SWPPP and DEIS Section 3G narratives stated that the basin is designed as a wet pond (Design P-2 from Chapter 6 of the SMDM), while Section 3F characterizes it as a "proposed pond and wetland system".

   Part I.C.1 of GP-0-20-001 specifically states that post-construction stormwater management practices (SMPs) must be selected and designed to meet the *performance criteria* (defined as the design criteria listed under the Required Elements) in Chapters 5, 6 and 10 of the SMDM. Designs not conforming to the Required Elements are a deviation from the technical standards. Part I.C.1 further states:

   "Where post-construction stormwater management practices ("SMPs") are not designed in conformance with the *performance criteria* in the Design Manual, the *owner or operator* must include in the SWPPP the reason(s) for the deviation or alternative design and provide information which demonstrates that the deviation or alternative design is *equivalent* to the technical standard."

   Equivalence, as defined in GP-0-20-001, "means that the practice or measure meets all the performance, longevity, maintenance, and safety objectives of the technical standard and will provide an equal or greater degree of water quality protection."

   The SWPPP shall be revised to include an "enhanced" discussion and evaluation/analysis for the design of Basin SWP-4 that satisfies the deviation requirements of Part I.C.1. As part of the discussion/evaluation/analysis, the SWPPP should specifically state the reason(s) for locating SWP-4 within Wetland #2/Watercourse W2; what options, if any, were evaluated to site the basin outside the watercourse/wetland, and; why, with supporting data/information, SWP-4 as designed is the best option.

2. As currently sited and designed, a few of the proposed infiltration SMPs as detailed below do not meet the required physical feasibility criteria in Sections 6.3.1 and 7.2 of the NYSSMDM. The designs must be corrected to meet the criteria and/or the practices must be moved alternate feasible locations:

   - Subsurface System INF-1 – subsurface infiltration practices must be located so that no more than 25% of the practice (which includes the bedding and cover stone) is in fill, i.e. a minimum 75% of the practice must be sited within the existing soil profile, using the minimum existing ground elevation where the proposed system footprint is located. According to the HydroCAD data input, the bottom of stone is at Elevation 324, which puts the top of stone at Elevation 328.33. 75% of the practice is at or below Elevation 327.25±. The Grading Plan shows the existing minimum ground running parallel to the east side of the field is at Elevation 326-326.50. By interpolation, only 50%± of the system will sit at or below the minimum existing ground elevation.
   - Subsurface System INF-2 – The existing ground surface within the system footprint runs between Elevations 360 and 366. According to the HydroCAD data input, the bottom of stone is at Elevation 364.50. 75% of the practice should be sited at or below minimum existing Elevation 360.
   - Subsurface System INF-4 – is sited in an area of existing/natural slopes greater than 15%.
   - Infiltration Basin #1 (SWP-2) – the proposed bottom is at Elevation 316, above the minimum existing elevation of 314.

3. The post-construction storm water management plan relies heavily on the use of infiltration (four subsurface chamber and stone systems, two surface basins for Phase 1) not only as SMPs with Runoff Reduction (RRv) capacity, but to also reduce post-development peak rates and volumes of runoff below pre-development levels at Design Points A and B for all design storms up to and including the 100-year event, given the high infiltration rates based on the January 2018 soil testing results provided in Appendix H of the SWPPP.

   While PDE acknowledges the caveats presented in the SWPPP that the infiltration rates used for design are based on the initial/preliminary infiltration test runs, and that final testing shall be performed to confirm the preliminary results, PDE has the following concerns about the parameters of the testing performed as it relates to the Phase 1 design, based on review of Appendix H, the Figure 4 Soil Testing Map (Dwg. ST-1), and the Phase 1 and Master Site Plans:

   - While the deep test pit locations are superimposed on the Master Drainage Plan, they are not shown on the Phase 1 Grading Plans, making it difficult to verify if

the tests locations are within the SMP bottom/footprint;

- While test pits were located close enough to the bottom/footprint of SMPs INF-1 (TP 18) and SWP-2 (TP 19) for preliminary designs, there is no test pit within or adjacent to the footprint for SMP INF-2;
- There is no evidence showing a correlation between the deep test pits, the infiltration tests, and the proposed SMP locations, i.e. whether the deep test pit and infiltration test locations are the same, or the proximity of the infiltration tests to the proposed SMP footprints, and;
- The following details/parameters were not provided in the infiltration tests: method (PVC casing, open hole); no. of runs/trials per location, and most importantly; elevation at bottom of test hole to verify if test was performed in the native/undisturbed subgrade soil layer just below the proposed bottom of the practice.

Final infiltration testing shall conform to the requirements in Appendix D of the NYSSMDM, Pages D-2 and D-3. While the Required Elements in Section 6.3.1 of the NYSSMDM states that one test hole per 5,000 sf of facility within the facility limits is the minimum acceptable, the Applicant's Engineer should consider implementing the following program, taken from the October 2004 DEC FAQ document about Technical Requirements of the SPDES General Permit (Item 32):

"Appendix D Concept Design Testing requirements notwithstanding, DEC accepts as complying with the department's technical standards a minimum of one test pit/boring and one infiltration test for every 5000 square feet of basin area, with no fewer than four test pit/boring and infiltration tests per facility. The area should be divided to equal subareas, tests performed in the center of each sub-area, the lowest and highest numbers discarded, and an average taken of the remaining values."

4. The design of the subsurface infiltration systems shall incorporate an overflow pipe to safety convey flows to downstream discharge points to prevent/protect the systems from surcharge. The inverts of the overflow pipes shall be such that the entire WQv required can still be contained/stored within the system, without accounting for exfiltration/infiltration.

5. The SWPPP satisfactorily states that "Required pretreatment for the stormwater runoff will be accomplished using subsurface Hydro-International First Defense High Capacity hydrodynamic separator chambers prior to each practice. The pretreatment practices are to be sized based on the peak flow generated by the one-year storm, 2.79" of rainfall in twenty-four hours (which is greater than the minimum required peak flow from the 90%/WQv event rainfall of 1.5)".

   NJDEP Certification and manufacturer's information is provided in Appendix C of the SWPPP. However, the Appendix does not include any calculations for selecting the

appropriate model/size of First Defense separator based on the one-year storm peak discharge rate tributary to each drainage sub area SMP measured against the model's NJDEP Certified maximum treatment flow rate. Sizing calculations shall be provided in Appendix C. In addition, the proposed locations for each required device shall be shown on the Phase 1 grading/drainage plans and an empirical/general construction detail from the manufacturer along with a tabular schedule of the required devices by SMP.

c. Pre- and Post—Development HydroCAD Computations
   1. The pre-development models in SWPPP Appendix A-1 do not account for the routing of existing flows from either Offsite Pond A to Design Point A (via Wetland #1/Watercourse W1 as a channel reach), or Offsite Pond B to Design Point B (via Wetland #2/Watercourse W2). Based on the computed times of concentration shown for Pre-A and Pre-B, reach travel times will be around 12-15 minutes (0.2 hours), which will affect the cumulative peak discharges at the design points. The models shall be revised to add channel flow segments between the offsite pond discharges and the design points.
   2. The post-development pond routing reports for the 100-year design storm in SWPPP Appendix A-2 show that none of the proposed SMPs (either surface or subsurface) provide a minimum required freeboard (vertical distance between the maximum water surface elevation anticipated in design and the top of retaining structures) of one (1) foot. The elevation/discharge data input in the post-development models shall be revised (refer also to Comment 3.b.4 above) to provide the minimum required freeboard.
   3. Details shall be added to the Phase 1 Site Plans showing elevation views of the proposed stormwater basins' outlet structures corresponding to the elevation/discharge data input (as revised) in the post-development HydroCAD models.

d. Miscellaneous
   1. In accordance with the requirements of Items 11-14 in Section 3.5 of the NYSSMDM, the narrative in Section 4.2 of the SWPPP outlining the responsibility and mechanisms to ensure the proposed long-term inspection, operation and maintenance (O&M) of the post-construction SMPs should be incorporated into a "stand-alone" O&M Plan within SWPPP Appendix G. The O&M Plan should also incorporate the appropriate Maintenance & Inspection Checklists from the NYSSMDM along with recommended inspection and required maintenance items and intervals for the Project SMPs from the NYSDEC document "Maintenance Guidance, Stormwater Management Practices", dated March 31, 2017.

H. UTILITIES (Except Water)

1. Section 3H shall be revised to incorporate the language/responses, including those relative to cumulative impacts, provided as an attachment to the Memorandum from VHB dated June 5, 2020.

2. The Applicant shall provide the proposed total average daily and peak hour domestic sewage flows for both Phase 1 and the Master Plan in tabular breakdowns by use, in a format like that of DEIS Table 3H-1.

3. The Phase 1 Site Plans shall be revised to show the resolution of the discrepancy in proposed sewer main for West Street, and to provide more information (plan/profiles, details, etc.) of the proposed crossing of Saw Mill River Road (Route 9A) from SMH-1 to the existing County trunk line, with conformance to applicable NYSDOT standards and specifications accounted for in addition to those of the Town of Mount Pleasant and Westchester County.

4. Even though the DEIS includes the Project Engineer's preliminary discussions with the Westchester County Department of Environmental Facilities (WCDEF) regarding the existing Westchester County Yonkers Joint Wastewater Treatment Plant's capacity within their system for future projects of the nature of the Proposed Action, the Project Engineer should still strive to obtain written correspondence from WCDEF confirming such status.

5. The Phase 1 Road Profiles (Drawing RP-1) shall be revised to show the proposed water/sanitary sewer crossings, with notation showing the proposed vertical separation conforming Ten States Standards requirements. Where not shown in profile view, other/remaining proposed water/sanitary sewer crossings shall be identified on the plans with similar vertical separation notation.

6. The Sanitary Sewer Notes on Drawing D-3 shall be revised to: provide the proper references for work to be in accordance with the Town of Mount Pleasant Standards and Specifications; indicate the proposed diameter(s) of sanitary sewer mains to be used for the Project; indicate the pipe material required for individual building connections (confirm/reference PVC as shown on the Sanitary Sewer Building Connection detail).

I. TRAFFIC AND TRANSPORTATION

Existing Traffic Volumes

The following study locations were analyzed:

1. Bradhurst Avenue and Sprain Brook Parkway SB On/Off Ramps
2. Bradhurst Avenue and Sprain Brook Parkway NB On Ramp
3. Bradhurst (Route 100) and Hospital Road
4. Bradhurst Avenue (Route 100) and 19 Bradhurst Avenue Driveway
5. Hospital Road and Sprain Brook Parkway NB Off Ramp
6. Hospital Road and Sprain Brook Parkway SB On Ramp
7. Hospital Road and Woods Road
8. Hospital Road and Proposed Site Driveway 2
9. Hospital Road and Proposed Route 9A Connector
10. Proposed Route 9A Connector and Proposed Site Driveway 3
11. Proposed Route 9A Connector and Proposed Site Driveway 4
12. NYS Route 9A and Proposed Route 9A Connector
13. Bradhurst Avenue and Joyce Place
14. Bradhurst Avenue and Broad Street
15. Bradhurst Avenue and Chelsea Street
16. Bradhurst Avenue and Brighton Avenue
17. Bradhurst Avenue and Broadway/Memorial Drive
18. Broadway and Sprain Brook Parkway SB On Ramp
19. Broadway and West Cross Street
20. Route 9A and Belmont Road
21. Route 9A and Skyline Drive (North)
22. Route 9A and Sawm Mill River Parkway NB On/Off Ramp
23. Route 9A and Skyline Drive (South)
24. Route 9A and Dana Road
25. Hospital Road and Sunshine Cottage Road
26. Dana Road and Hammond House Road
27. Dana Road and Walker Road
28. Bradhurst Avenue and Lakeview Avenue
29. Route 100A/100C and Bradhurst Avenue (Route 100)
30. Route 100C and Sprain Brook Parkway NB On/Off Ramps
31. Route 100C and Sprain Brook Parkway SB On/Off Ramps
32. Route 100C and Woods/Taylor Road
33. Route 100C and Walker Road/Clearbrook Road
34. Route 9A and Old Saw Mill River Road (North)
35. Route 9A and Old Saw Mill River Road (South)
36. Old Saw Mill River Road and West Stevens Avenue

The Applicant performed Peak Hour Manual Turning Movement (MTM) traffic counts at the study locations during the two (2) different analysis periods as follows:

1. Typical Weekday AM Peak Hour (non-Summer/non-Friday – school still in session)
2. Typical Weekday PM Peak Hour (non-Summer/non-Friday – school still in session)

In order to verify the MTM traffic counts the Applicant performed 24-hour Automatic Traffic Recorder (ATR) machine counts at the following locations:

1. Route 9A (North of Old Saw Mill River Road)
2. Bradhurst Avenue (Route 100) north of Hospital Road
3. Bradhurst Avenue (Route 100) south of Sprain Brook Parkway Ramps
4. Hospital Road west of Woods Road
5. Woods Road south of Hospital Road

The following are comments with respect to the traffic data collection.

1. A comparison should be provided between the ATR machine counts and the Turning Movement Counts, in order to determine that both data sets are within a reasonable deviation. Otherwise adjustments should be made to the volumes. There is a sixth location that is not listed in the DEIS, but it is provided in the Appendix P. This is on Route 9A Northbound (North of Old Saw Mill River Road and South of Belmont Road). The Applicant should clarify why this exclusion from the list. In addition, the Technical Appendix also does not contain the traffic counts for the following locations:

    a. Location 16 – Typical Weekday Peak AM and Peak PM Hours
    b. Location 17 – Typical Weekday Peak AM and Peak PM Hours
    c. Location 28 – Typical Weekday Peak AM and Peak PM Hours

    The Applicant should identify how the traffic volumes at these locations, during the associated time periods were determined.

Background Traffic Volume Development

The Applicant utilized a 1.0% annually compounded growth rate to develop future No-Build Traffic Volumes in the Proposed Project Design Year of 2024. Additionally, traffic volumes from four (4) adjacent developments were included in the future No-Build Traffic Volumes, which are listed below

- Loop Road Holdings (Regeneron Expansion) – Greenburg – Phase 1/Phase 2
- Landmark at Eastview South Campus – Greenburg – Phase 1
- Landmark at Eastview North Campus – Mount Pleasant – Phase 1/Phase 2
- Westchester Medical Center Health – Mount Pleasant

The following are comments as they pertain to the development of the future No-Build Traffic Volumes:

1. In order to justify utilization of the 1.0% annually compounded growth rate, the Applicant references historical traffic volume data from 2009 and 2017 for NYS Route 9A, NYS Route 100, and NYS Route 100C which is available in the NYSDOT Traffic Data Report. The Applicant should consider referencing additional historical data for roadways in the area, such as Sprain Brook Parkway. If these additional references identify a more significant growth rate for the area, then this should be applied to the Existing Traffic Volumes to provide a better representation of future No-Build Traffic Volumes.

2. The Applicant should provide additional information with respect to adjacent developments to verify the volumes identified on adjacent development traffic volume figures contained in the Technical Appendix. The Applicant identifies the source of the information in Appendices D and G, but does not provide the actual data, such as pertinent pages from the referenced Traffic Study or ITE Trip Generation calculations. Additionally, the Applicant should identify how they extended the Trip Distributions for these adjacent developments to encompass the Proposed Project's Study Area.

Trip Generation

The Applicant states the proposed project will have two phases that will consist of a total of 500,000 sf for Phase 1 and 3,000,000 sf in Phase 2. Phase 1 will consist of a 120-room hotel, 1000,000 sf of medical office, 220,000 sf of bio-tech/research, 20,000 sf of grocery store space, 20,000 sf of fitness space, 20,000 sf of pharmacy space, and 15,000 sf of general retail space. Phase 2 will consist of a 120-room hotel, 4000,000 sf of medical office, 2,144,000 sf of bio-tech/research, 142,000 sf of children's living science education center, 20,000 sf of grocery store space, 20,000 sf of fitness space, 20,000 sf of pharmacy with drive-through space, and 149,000 sf of general retail The Proposed Project Peak Hour Trip Generation estimates were based upon these amounts of square footage and the number of hotel rooms at the site and using the Institute of Transportation Engineer's Trip Generation Manual. The Applicant has also used a 25% Pass-by credit that has been applied to the Retail Land Uses. The following are comments on the Applicant's Proposed Project Trip Generation estimates:

1. The derivation of the Trip Generation Estimates has been reviewed and PDE finds the methodology acceptable. The Applicant should confirm which edition of the ITE Trip Generation Manual was utilized.

2. Discussion should be provided with respect to the data and operations at the existing 19 Bradhurst Avenue Medical Building, in order to clarify the methodology used to calculate Hourly Trip Generation Rates for the Medical Office land use.

Trip Distribution

In order to determine the projected travel routes to and from the Proposed Project, the Applicant utilized the proposed site layout/driveways, area population, exiting traffic volumes and expected traffic patterns. The following are comments on the development of Proposed Project Trip Distributions:

1. The Phase 1 and Phase 2 Arrival and Departure Distribution Figures for all Land Uses, except the Hotel Land Use, demonstrate that 15% of vehicles will arrive/depart from Woods Road and another 15% will arrive/depart from Hospital Road/Walker Road. When the distribution is backtracked to the area south of the Site, it is shown that 5% are turning from NYS Route 100 to Walker Road and another 5% to Woods Road. This subsequently leads to 20% originating from the Westchester Medical Center. The Applicant should provide additional information why 20% would be arriving from/departing to the Westchester Medical Center.

2. On the Arrival Distribution for Retail/Grocery/Pharmacy/Fitness Figure 14-C (Phase 1) and Figure 38-C (Phase 2), the Applicant demonstrates that no traffic will be arriving from the Saw Mill River Parkway Northbound Off-Ramp. Since this is a major roadway in the area, it is likely that some number of trips will utilize this route. The Applicant should provide additional justification to support no assignment of traffic to the Saw Mill River Parkway Northbound Off-Ramp and/or provide revised analysis with consideration of traffic utilizing this Exit to access the Proposed Project. It should be noted that all other Land Uses have vehicle trips assigned to this Exit.

3. The Phase 1 and Phase 2 Arrival and Departure Distribution Figures for all Hotel Land Use demonstrate that 15% of vehicles will arrive/depart from Woods Road and another 15% will arrive/depart from Hospital Road/Walker Road. When the distribution is backtracked to the area south of the Site, it is shown that 0% are arriving/departing from NYS Route 100. This subsequently leads to 30% originating/departing from the Westchester Medical Center. The Applicant should provide additional information on why 30% would be arriving from/departing to the Westchester Medical Center.

4. Due to confluence of many major highways, such as I-287, Saw Mill River Parkway, Sprain Brook Parkway, and NYS Route 9A, a more regional distribution should be provided for the Project. One particular item that should be clarified is how site generated trips are accessing Grasslands Road. Are these trips accessing from the Saw Mill River Parkway or from NYS Route 9A. In addition, it seems that a more direct route to the Site would be by exiting at Exit 25 of the Saw Mill River Parkway towards the Route 9A Connector instead of exiting at Exit 23 to get to Grasslands Road. This leads us to believe that additional justification should be provided.

Analyses

PDE has reviewed the highway capacity analysis files provided and offers the following general comments regarding parameters utilized in the analysis:

1. Lane Widths – Adjustments to lane widths were made to the analysis, which have an effect on the analysis results. The Applicant should clarify how the lane widths were determined. No field measurements were included in the Technical Appendix identifying associated lane widths.

2. Approach Percent Grades – Adjustments to intersection approach grades were made to the analysis, which have an effect on the analysis results. The Applicant should clarify how the approach grades were determined. No field measurements were included in the Technical Appendix identifying associated lane widths.

3. Right-Turn-On-Red (RTOR) – While the analysis does show RTOR's restricted in the study, based on field observations the Applicant should update the analysis to reflect the RTOR restriction, particularly at the following intersection:

    a. Bradhurst Avenue and Broadway/Memorial Drive

4. Pedestrian Counts – The Applicant should provide a figure(s) showing the peak hour pedestrian volumes for all hours studied. The Applicant should account for all pedestrian volumes in the analysis.

5. Peak Hour Factors – The Applicant should provide the calculations for the Peak Hour Factors used in analysis.

6. Traffic Signal Phasing/Timing – The Applicant has not provided traffic signal timing information, including pedestrian signal timings, for the following intersections:

    1. NYS Route 100 (Bradhurst Avenue) and Sprain Brook Parkway Northbound On Ramp
    2. NYS Route 141 (Broadway) and Bradhurst Avenue/Memorial Drive
    3. NYS Route 141 (Broadway) and West Cross Street
    4. NYS Route 9A and Skyline Drive (North Leg)
    5. NYS Route 9A and Saw Mill River Parkway NB On/Off Ramps/1824 Driveway
    6. NYS Route 9A and Dana Road/Home Depot Driveway
    7. NYS Route 100 (Bradhurst Avenue)/NYS Route 100A (Knollwood Road) and NYS Route 100C (Grasslands Road)
    8. NYS Route 100C (Grasslands Road) and Sprain Brook Parkway Southbound On/Off Ramps
    9. NYS Route 100C (Grasslands Road) and Woods Road/Taylor Road
    10. NYS Route 100C (Grasslands Road) and Walker Road/Clearbrook Road

The Applicant should clarify how the traffic signal phasing and timings were determined for this location, as it appears that the signal phasing in the analysis is in conflict. If traffic signal phasing and timings were determined in the field, the backup data should be provided.

7. Vehicle Detection – The vehicle detection parameters were adjusted in the analysis, which would have an effect on the analysis results. The Applicant should clarify how the vehicle detection areas were determined.

8. Storage Lane Lengths – Existing and future storage lane lengths at the intersection of Taylor Road/Woods Road and NYS Route 100C for the Eastbound Left Lane appear to conflict with field observations and/or conceptual improvement plans provided by the Applicant. This storage length should be checked to ensure consistency and revised in the analysis where appropriate.

The following are more specific comments related to particular study locations/areas:

1. Location 8 – Hospital Road and Proposed Site Driveway 2

    a. The Conceptual Improvement Plan illustrated on Exhibits 1 and 2 shows the proposed westbound approach to consist of one exclusive left-turn lane and one shared through/right-turn lane, with an approximate 100' of storage for the shared lane. However, the intersection is analyzed with the left-turn lane having 100' of storage. The Applicant should correct this discrepancy.

2. Location 9 – Hospital Road and Route 9A Connector Road

    a. The Conceptual Improvement Plan illustrated on Exhibits 1 and 2 shows the proposed southwest approach to consist of one shared through/right-turn lane that consist of a channelized right turn. However, the intersection is analyzed with a separate through lane and right-turn lane. The Applicant should correct this discrepancy.

3. Location 12 – Route 9A Connector Road and Rosedale Nurseries/NYS Route 9A

    a. The Conceptual Improvement Plan illustrated on Exhibits 1 and 2 shows the proposed northbound approach to consist of one left-turn lane and a shared through/right-turn lane. However, the intersection is analyzed with a shared through/left-turn lane and a separate right-turn lane. The Applicant should correct this discrepancy.

The following are PDE's comments related to the results of the highway capacity analysis. It should be noted that many of these results will change based upon revisions to analysis to address comments noted herein.

1. In general, there are several instances where Level of Service (LOS), Delay/Density and V/C ratio values listed on the detailed LOS Summary Tables do not match results shown in the Synchro

analysis files. The Applicant should resolve any inconsistencies between the analysis results and LOS Summary Tables.

2. PDE has highlighted the LOS Summary Tables (see Attachment A) to note significant degradations in LOS/Average Vehicular Delay. The Applicant should address these degradations in LOS/Average Vehicular Delay and identify necessary mitigation to offset any adverse impacts.

3. The following outlines locations where estimated queue lengths are anticipated to exceed available storage:

    a. During the Typical Weekday Peak AM Hour, the northbound Sprain Brook Parkway Off-Ramp right-turn lane at Hospital Road exceeds the storage length by approximately 90'. This could have profound effects on the Sprain Brook Parkway Northbound lanes.

    b. During the Typical Weekday Peak PM Hour, the northbound Skyline Drive right-turn lane at NYS Route 9A exceeds the storage length by approximately 150'. Although some of the segments fail in the No-Build condition, the additional traffic volume generated by the project along these segments further exacerbates the densities at these locations.

    c. During the Typical Weekday Peak AM Hour and Peak PM Hour, the southbound NYS Route 100 (Bradhurst Avenue) approach at NYS Route 100A (Knollwood Road)/NYS Route 100C (Grasslands Road) exceeds the storage length by approximately 200'. Although some of the segments fail in the No-Build condition, the additional traffic volume generated by the project along these segments further exacerbates the densities at these locations and has the potential of blocking several side streets.

    d. During the Typical Weekday Peak AM Hour, the westbound NYS Route 100C (Grasslands Road) approach at Walker Road/Clearbrook Road exceeds the storage length by approximately 900'. Although some of the segments fail in the No-Build condition, the additional traffic volume generated by the project along these segments further exacerbates the densities at these locations.

    e. During the Typical Weekday Peak PM Hour, the southwest NYS Route 9A approach at Saw Mill River Parkway NB On/Off Ramps/1824 Driveway exceeds the storage length by approximately 45'. Although some of the segments fail in the No-Build condition, the additional traffic volume generated by the project along these segments further exacerbates the densities at these locations.

    The Applicant should determine anticipated impacts due to the exceedance of available storage lengths at these locations and identify necessary mitigation to offset any adverse impacts.

Simulation Modeling

PDE has not been provided with the SimTraffic Simulation Models at this time. electronically by the Applicant. All Simulation Models should be provided with the full one hour of vehicle loading and recording should be provided to demonstrate the overall operations during the entire Peak Hour.

Improvements

The following is a list of comments on the proposed improvements contained in the Traffic Impact Study Report:

1. As noted previously, the queues at the Sprain Brook Parkway NB Off-Ramp at Hospital Road exceed the providing storage length. Increasing the storage length should be considered to mitigate this additional queue.

2. The conceptual Improvement Plans do not illustrate a connection to the Mid Westchester Executive Park. Adding a connection to the Mid Westchester Executive Park could potentially mitigate the additional delays that will be experienced at the Skyline Drive (North Leg) and NYS Route 9A intersection.

3. Vehicle Turning Analysis should be conducted on the Conceptual Improvement Plans with the anticipated largest vehicles that will travel these roadways. In order to determine that the vehicles can maneuver safely through the improvements.

4. The Conceptual Improvement Plans do not illustrate that the intersection of NYS Route 9A and the Route 9A Connector will be signalized. The signalized symbol should be added to match what was analyzed in the study.

5. For the Conceptual Improvement Plan Phase 2, at the intersections of the Route 9A Connector and Driveway 3 and 4, there should be a break in the centerline striping to illustrate that vehicles coming out of Driveways 3 and 4 can make a left turn onto the Route 9A Connector.

6. The Project proposes to provide shuttle bus services between North 60 and Westchester Medical Center to the Metro North Stations located in close proximity to the Site. To be effective, the shuttle bus service will be coordinated with the northbound and southbound trains during the Weekday Peak AM hours and Peak PM hours.

Accident Data

The following are comments with respect to the Accident Data presented in the DEIS:

1. There are no accident summaries of individual key intersections. This information/analysis should be provided.

2. It appears that the first bullet point in the Accident Data section is missing some text. The sentence in question is the following "Base on the anticipated Site Generation, it is expected that the proposed NYS Route 100 (Bradhurst Avenue) in the vicinity of the Site.". This should be clarified.

3. The High Accident Locations that are discussed in the text reference that there are 59 accidents along NYS Route 9A between Skyline Drive and Old Saw Mill River Road and 47 accidents on NYS Route 100C between the Sprain Brook Ramps. This data should be provided and summarized to determine if there are any patterns in the type of accidents that can lead to specific design measures that will improve safety.

4. The second bullet point in the Accident Data section misspells Old Saw Mill River Road in the first sentence as "Old Saw Mill River Old".

Traffic Circulation and Parking

The following are comments on the Site Plans as they relate to Traffic Circulation and Parking:

1. A Plan for Phase 2 should be provided clearly showing the striping/circulation/laneage/parking, including parking stall and aisle dimensions, that is exclusive of the grade lines and other lines so that it is readable. The plan should also clearly indicate key signage.

2. The Peak Parking Demand calculations illustrate that several areas in the development will have a deficient amount of parking provided. In addition, typical industry standards recommend a cushion of 5% - 10% parking supply to account for any special events and to avoid having patrons driving around looking for a parking space for extensive amounts of time.

3. Truck turning templates should be provided along designated delivery routes to demonstrate the maximum design vehicle anticipated at the Proposed Project Site can be accommodated.

4. Turning templates for emergency service vehicles should be provided along emergency service access drives to demonstrate these vehicles can be readily accommodated.

5. A sight distance analysis for all Site Driveways should be conducted.

Q. CONSTRUCTION

1. Section 3Q shall be revised to incorporate the language/responses provided as an attachment to the Memorandum from VHB dated June 5, 2020.

2. The Construction Phasing and Sequencing in Section 3Q and in SWPPP Appendix L shall be revised to address the various comments provided under Section 3G – Stormwater Management above.

3. The Applicant should provide additional discussion/analysis with respect to how the existing roadway network will accommodate the peak construction traffic (assumes roadway improvements are not in place prior to construction commencing).

4. The Applicant should identify the anticipated truck routes and any pavement deterioration due to this temporary heavy vehicle loading should be mitigated post construction.

5. The Applicant should indicate whether any oversized vehicles will be necessary for delivery of large equipment/materials. If so, the Applicant should identify the anticipated travel route for this delivery and demonstrate the existing roadway infrastructure can support this vehicle.

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ATTACHMENT A

HIGHLIGHTED LEVEL OF SERVICE TABLES

TABLE NO. 2

PHASE 1

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION		YEAR 2019 EXISTING						YEAR 2024 NO-BUILD						YEAR 2024 BUILD - PHASE 1					
			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
			LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
1	NYS ROUTE 100 (BRADHURST AVENUE) & SBP SB ON/OFF RAMPS																			
	UNSIGNALIZED																			
	NYS ROUTE 100	NB L-T	A	8.9	0.00	A	7.4	0.00	A	9.0	0.00	A	7.4	0.00	A	8.7	0.00	A	7.4	0.00
	SBP SB OFF RAMP	EB L-R	B	13.5	0.07	B	11.5	0.04	B	14.0	0.08	B	11.7	0.05	B	12.8	0.07	B	11.4	0.05
2	NYS ROUTE 100 (BRADHURST AVENUE) & SBP NB ON RAMP																			
	UNSIGNALIZED																			
	NYS ROUTE 100	NB L-T	B	10.6	0.12	A	8.2	0.19	B	11.2	0.15	A	8.4	0.23	B	11.0	0.16	A	8.5	0.24
3	NYS ROUTE 100 (BRADHURST AVENUE) & HOSPITAL ROAD																			
	SIGNALIZED																			
	HOSPITAL ROAD	EB L	B	19.7	0.49	C	28.1	0.91	B	19.7	0.52	D	47.3	0.97	B	19.1	0.46	C	25.8	0.89
		EB R	C	23.3	0.82	B	12.3	0.13	C	23.3	0.82	B	13.9	0.14	C	23.4	0.84	B	14.0	0.22
		EB OVERALL	**C**	**21.8**	**--**	**C**	**26.6**	**--**	**C**	**21.7**	**--**	**D**	**44.1**	**--**	**C**	**21.7**	**--**	**C**	**24.0**	**--**
	NYS ROUTE 100	NB L-T	C	31.2	0.75	C	23.8	0.79	F	172.3	1.24	D	41.9	0.90	F	331.5	1.61	C	23.9	0.80
		NB OVERALL	**C**	**31.2**	**--**	**C**	**23.8**	**--**	**F**	**172.3**	**--**	**D**	**41.9**	**--**	**F**	**331.5**	**--**	**C**	**23.9**	**--**
	NYS ROUTE 100	SB T-R	C	27.3	0.92	B	12.6	0.03	F	51.9	1.03	B	15.1	0.29	F	45.3	1.00	B	11.6	0.29
		SB OVERALL	**C**	**27.3**	**--**	**B**	**12.6**	**--**	**F**	**51.9**	**--**	**B**	**15.1**	**--**	**D**	**45.3**	**--**	**B**	**11.6**	**--**
	OVERALL INTERSECTION		**C**	**25.9**	**--**	**C**	**23.7**	**--**	**D**	**54.4**	**--**	**D**	**39.3**	**--**	**E**	**72.3**	**--**	**C**	**22.0**	**--**
	W/SIGNAL TIMING IMPROVEMENTS																			
	HOSPITAL ROAD	EB L	--	--	--	--	--	--	--	--	--	--	--	--	C	32.2	0.52	--	--	--
		R	--	--	--	--	--	--	--	--	--	--	--	--	E	69.5	0.94	--	--	--
		EB OVERALL	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**D**	**54.5**	**--**	**--**	**--**	**--**
	NYS ROUTE 100	NB L-T	--	--	--	--	--	--	--	--	--	--	--	--	E	68.7	0.90	--	--	--
		NB OVERALL	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**E**	**68.7**	**--**	**--**	**--**	**--**
	NYS ROUTE 100	SB T-R	--	--	--	--	--	--	--	--	--	--	--	--	C	21.9	0.86	--	--	--
		SB OVERALL	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**C**	**21.9**	**--**	**--**	**--**	**--**
	OVERALL INTERSECTION		**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**D**	**38.4**	**--**	**--**	**--**	**--**
4	NYS ROUTE 100 (BRADHURST AVENUE) & 19 BRADHURST DRIVEWAY																			
	UNSIGNALIZED																			
	NYS ROUTE 100	NWB L-T	A	9.6	0.06	A	7.7	0.01	A	9.7	0.07	A	7.8	0.01	A	9.8	0.07	A	7.9	0.01
	19 BRADHURST DRWY	EB L	C	24.9	0.23	D	29.5	0.73	D	27.4	0.26	E	37.6	0.81	D	30.4	0.28	F	58.8	0.92
	19 BRADHURST DRWY	EB R	B	13.3	0.04	A	9.7	0.11	B	13.8	0.04	A	9.8	0.11	B	14.0	0.04	B	10.2	0.12
5	HOSPITAL ROAD & SBP NB OFF RAMP																			
	UNSIGNALIZED																			
	SBP NB OFF RAMP	NB L-R	F	179.5	1.32	E	37.6	0.84	F	301.8	1.60	F	83.5	1.04	F	322.2	1.64	E	40.1	0.85
6	HOSPITAL ROAD & SBP SB ON RAMP																			
	UNSIGNALIZED																			
	HOSPITAL ROAD	WB L	A	8.4	0.04	B	10.3	0.20	A	8.5	0.05	B	11.1	0.24	A	8.5	0.05	B	10.0	0.18
7	HOSPITAL ROAD & WOODS ROAD																			
	UNSIGNALIZED																			
	HOSPITAL ROAD	EB T-R	A	9.8	0.24	C	19.9	0.68	B	10.3	0.27	D	32.4	0.84	--	--	--	--	--	--
	HOSPITAL ROAD	WB L	B	14.0	0.51	B	11.8	0.26	C	16.9	0.61	B	13.6	0.33	--	--	--	--	--	--
	HOSPITAL ROAD	WB T	C	18.1	0.68	B	10.9	0.23	C	23.1	0.77	B	12.4	0.30	--	--	--	--	--	--
	WOODS ROAD	NB L-R	B	10.5	0.24	B	15.0	0.55	B	11.1	0.27	C	21.4	0.70	--	--	--	--	--	--
															--	--	--	--	--	--
	OVERALL INTERSECTION		**B**	**14.7**	**--**	**C**	**16.1**	**--**	**C**	**17.8**	**--**	**C**	**23.7**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
	HOSPITAL ROAD & WOODS ROAD/ SITE DRIVEWAY 1																			
	UNSIGNALIZED																			
	HOSPITAL ROAD	EB L	--	--	--	--	--	--	--	--	--	--	--	--	B	10.6	0.03	B	10.4	0.04
		EB T-R	--	--	--	--	--	--	--	--	--	--	--	--	C	21.0	0.65	F	90.0	1.09
	HOSPITAL ROAD	WB L	--	--	--	--	--	--	--	--	--	--	--	--	C	18.5	0.57	B	13.2	0.25
	HOSPITAL ROAD	WB T-R	--	--	--	--	--	--	--	--	--	--	--	--	F	77.5	1.04	C	16.1	0.47
	WOODS ROAD	NB L-T-R	--	--	--	--	--	--	--	--	--	--	--	--	C	18.6	0.58	D	27.8	0.78
	WOODS ROAD	SB L-T-R	--	--	--	--	--	--	--	--	--	--	--	--	B	11.2	0.05	B	11.9	0.09
	OVERALL INTERSECTION		**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**E**	**41.2**	**--**	**F**	**50.1**	**--**
	W/SIGNALIZATION																			
	HOSPITAL ROAD	EB L	--	--	--	--	--	--	--	--	--	--	--	--	B	10.4	0.03	B	10.8	0.03
		EB T-R	--	--	--	--	--	--	--	--	--	--	--	--	B	14.9	0.40	C	20.4	0.64
		EB APPROACH	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**B**	**14.7**	**--**	**C**	**20.1**	**--**
	HOSPITAL ROAD	WB L	--	--	--	--	--	--	--	--	--	--	--	--	A	9.1	0.42	B	13.4	0.28
		WB T-R	--	--	--	--	--	--	--	--	--	--	--	--	B	11.7	0.47	B	11.7	0.21
		WB APPROACH	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**B**	**10.8**	**--**	**B**	**12.3**	**--**
	WOODS ROAD	NB L-T-R	--	--	--	--	--	--	--	--	--	--	--	--	D	42.5	0.76	D	42.3	0.82
		NB APPROACH	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**D**	**42.5**	**--**	**D**	**42.3**	**--**
	WOODS ROAD	SB L-T-R	--	--	--	--	--	--	--	--	--	--	--	--	C	30.9	0.07	C	25.7	0.09
		SB APPROACH	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**C**	**30.9**	**--**	**C**	**25.7**	**--**
	OVERALL INTERSECTION		**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**B**	**18.1**	**--**	**C**	**24.9**	**--**

TABLE NO. 2

PHASE 1

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION			YEAR 2019 EXISTING						YEAR 2024 NO-BUILD						YEAR 2024 BUILD - PHASE 1					
				WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
				LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
8	HOSPITAL ROAD WESTCHESTER MEDICAL CENTER LOT 10 PROPOSED DRIVEWAY #2																				
	UNSIGNALIZED																				
	HOSPITAL ROAD	EB	L	--	--	--	--	--	--	--	--	--	--	--	--	A	10.0	0.21	A	8.5	0.14
	HOSPITAL ROAD	WB	L	A	7.6	0.03	A	8.2	0.02	A	7.7	0.05	A	8.4	0.04	A	7.8	0.05	A	7.8	0.03
	WMC LOT 10	NB	L-T-R	A	8.6	0.02	A	8.9	0.05	A	8.2	0.03	A	9.2	0.12	C	16.3	0.09	C	19.2	0.28
	PROPOSED DRWY #2	SB	L-T-R	--	--	--	--	--	--	--	--	--	--	--	--	F	150.3	1.15	F	326.5	1.63
	W/SIGNALIZATION																				
	HOSPITAL ROAD	EB	L	--	--	--	--	--	--	--	--	--	--	--	--	B	10.4	0.35	B	16.2	0.34
			T	--	--	--	--	--	--	--	--	--	--	--	--	A	9.0	0.19	B	14.4	0.26
			R	--	--	--	--	--	--	--	--	--	--	--	--	A	7.8	0.03	B	12.1	0.01
		EB APPROACH		--	--	--	--	--	--	--	--	--	--	--	--	**A**	**9.6**	--	**B**	**15.1**	--
	HOSPITAL ROAD	WB	L	--	--	--	--	--	--	--	--	--	--	--	--	A	1.1	0.11	C	28.1	0.06
			T	--	--	--	--	--	--	--	--	--	--	--	--	A	2.0	0.43	C	32.2	0.29
			R	--	--	--	--	--	--	--	--	--	--	--	--	A	1.7	0.33	C	31.5	0.25
		WB APPROACH		--	--	--	--	--	--	--	--	--	--	--	--	**A**	**1.8**	--	**C**	**31.6**	--
	WMC LOT 10	NB	L-T-R	--	--	--	--	--	--	--	--	--	--	--	--	C	25.4	0.02	B	19.4	0.08
		NB APPROACH		--	--	--	--	--	--	--	--	--	--	--	--	**C**	**25.4**	--	**B**	**19.4**	--
	PROP DRWY #2	SB	L-T-R	--	--	--	--	--	--	--	--	--	--	--	--	C	34.4	0.53	C	34.0	0.83
		SB APPROACH		--	--	--	--	--	--	--	--	--	--	--	--	**C**	**34.4**	--	**C**	**34.0**	--
	OVERALL INTERSECTION			--	--	--	--	--	--	--	--	--	--	--	--	**B**	**10.2**	--	**C**	**27.3**	--
9	HOSPITAL ROAD & PROPOSED ROUTE 9A CONNECTOR																				
	UNSIGNALIZED																				
	HOSPITAL ROAD	NEB	L	--	--	--	--	--	--	--	--	--	--	--	--	A	8.6	0.04	A	8.8	0.12
	ROUTE 9A CONNECTOR	SEB	L	--	--	--	--	--	--	--	--	--	--	--	--	D	27.2	0.58	D	22.3	0.36
		SEB	R	--	--	--	--	--	--	--	--	--	--	--	--	B	12.2	0.19	A	9.5	0.03
10	PROPOSED ROUTE 9A CONNECTOR & PROPOSED DRIVEWAY #3																				
	UNSIGNALIZED																				
	ROUTE 9A CONNECTOR	SB	L	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	PROP DRWY #3	WB	L-R	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
11	PROPOSED ROUTE 9A CONNECTOR & PROPOSED DRIVEWAY #4																				
	UNSIGNALIZED																				
	ROUTE 9A CONNECTOR	SB	L	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	PROP DRWY #4	WB	L-R	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
12	NYS ROUTE 9A & ROSEDALE NURSERIES																				
	UNSIGNALIZED																				
	NYS ROUTE 9A	EB	L-T	B	12.0	0.03	A	8.6	0.01	B	13.2	0.03	A	8.7	0.01	--	--	--	--	--	--
			T-R	A	0.2	0.00	A	0.1	0.00	A	0.3	0.00	A	0.1	0.00	--	--	--	--	--	--
	ROSEDALE NURSERIES	SB	L-T-R	E	37.8	0.04	C	22.6	0.19	F	50.8	0.05	D	27.5	0.24	--	--	--	--	--	--
	W/ PROPOSED ROUTE 9A CONNECTOR W/ SIGNALIZATION																				
	NYS ROUTE 9A	EB	L-T	--	--	--	--	--	--	--	--	--	--	--	--	A	2.4	0.34	A	9.8	0.60
		EB	T-R	--	--	--	--	--	--	--	--	--	--	--	--	A	2.6	0.35	B	10.1	0.62
		EB APPROACH		--	--	--	--	--	--	--	--	--	--	--	--	**A**	**2.5**	--	**A**	**9.9**	--
	NYS ROUTE 9A	WB	L-T	--	--	--	--	--	--	--	--	--	--	--	--	A	9.6	0.75	B	10.9	0.47
		WB	T-R	--	--	--	--	--	--	--	--	--	--	--	--	A	5.8	0.67	A	7.6	0.39
		WB APPROACH		--	--	--	--	--	--	--	--	--	--	--	--	**A**	**7.6**	--	**A**	**8.8**	--
	ROUTE 9A CONNECTOR	NB	L	--	--	--	--	--	--	--	--	--	--	--	--	E	55.5	0.35	D	51.6	0.66
	ROUTE 9A CONNECTOR	NB	R	--	--	--	--	--	--	--	--	--	--	--	--	E	63.0	0.71	D	45.3	0.57
		NB APPROACH		--	--	--	--	--	--	--	--	--	--	--	--	**E**	**59.8**	--	**D**	**48.2**	--
	ROSEDALE NURSERIES	SB	L-T-R													D	52.9	0.03	D	44.3	0.43
		SB APPROACH														**D**	**52.9**	--	**D**	**44.3**	--
	OVERALL INTERSECTION			--	--	--	--	--	--	--	--	--	--	--	--	**A**	**9.0**	--	**B**	**15.8**	--

TABLE NO. 2

PHASE 1

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION		YEAR 2019 EXISTING						YEAR 2024 NO-BUILD						YEAR 2024 BUILD - PHASE 1					
			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
			LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
13	NYS ROUTE 100 (BRADHURST AVENUE) & JOYCE PLACE																			
	UNSIGNALIZED																			
	NYS ROUTE 100	NB L-T	A	9.7	0.07	A	8.2	0.06	A	10.0	0.08	A	8.3	0.06	A	9.6	0.08	A	8.3	0.06
	JOYCE PLACE	EB L-R	C	16.4	0.18	B	12.6	0.20	C	17.3	0.20	B	13.1	0.22	C	15.8	0.18	B	12.9	0.22
14	NYS ROUTE 100 (BRADHURST AVENUE) & BROAD STREET																			
	UNSIGNALIZED																			
	NYS ROUTE 100	NB L-T-R	A	0.0	0.00	A	8.3	0.01	A	0.0	0.00	A	8.3	0.01	A	9.0	0.00	A	8.3	0.01
	NYS ROUTE 100	SB L-T-R	A	7.6	0.00	A	8.8	0.01	A	7.6	0.00	A	8.9	0.01	A	7.5	0.00	A	8.6	0.01
	BROAD STREET	EB L-T-R	B	13.5	0.02	B	14.6	0.04	B	13.9	0.02	C	15.2	0.04	B	12.9	0.02	B	14.0	0.04
	BROAD STREET	WB L-T-R	C	17.3	0.06	C	21.4	0.10	C	18.4	0.07	C	23.2	0.11	C	16.6	0.06	C	21.5	0.11
15	NYS ROUTE 100 (BRADHURST AVENUE) & CHELSEA STREET																			
	UNSIGNALIZED																			
	NYS ROUTE 100	NB L-T-R	A	0.0	0.00	A	7.8	0.00	A	0.0	0.00	A	7.9	0.00	A	8.7	0.00	A	7.9	0.00
	NYS ROUTE 100	SB L-T-R	A	7.8	0.04	A	8.8	0.03	A	7.8	0.04	A	8.9	0.03	A	7.7	0.04	A	8.6	0.03
	CHELSEA STREET	EB L-T-R	B	14.2	0.04	B	13.3	0.04	B	14.7	0.04	B	13.8	0.04	B	13.4	0.04	B	12.8	0.04
	CHELSEA STREET	WB L-T-R	F	75.8	0.84	F	72.5	0.88	F	109.5	0.97	F	104.2	1.00	F	62.4	0.80	F	72.3	0.89
16	NYS ROUTE 100 (BRADHURST AVENUE) & BRIGHTON AVENUE																			
	UNSIGNALIZED																			
	NYS ROUTE 100	SB L-T	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
	BRADHURST AVENUE	WB L-R	D	29.2	0.44	C	18.6	0.30	D	32.6	0.49	C	19.9	0.33	C	24.4	0.45	C	16.7	0.31
17	NYS ROUTE 141 (BROADWAY) & BRADHURST AVENUE/MEMORIAL DRIVE																			
	SIGNALIZED																			
	BRADHURST AVENUE	EB L-T-R	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		EB OVERALL	**A**	**0.0**	**--**	**A**	**0.0**	**--**	**A**	**0.0**	**--**	**A**	**0.0**	**--**	**A**	**0.0**	**--**	**A**	**0.0**	**--**
	NYS ROUTE 141	WB L-T	C	29.4	0.25	B	15.5	0.20	C	31.6	0.29	B	16.3	0.21	C	32.5	0.34	B	16.5	0.24
		WB R	A	4.5	0.30	A	5.8	0.35	A	4.6	0.31	A	5.9	0.37	A	4.6	0.31	A	5.9	0.37
		WB OVERALL	**B**	**10.9**	**--**	**A**	**8.4**	**--**	**B**	**11.8**	**--**	**A**	**8.7**	**--**	**B**	**12.9**	**--**	**A**	**9.0**	**--**
	NYS ROUTE 141	SEB L-T-R	C	34.1	0.93	C	21.8	0.81	D	39.4	0.96	C	21.9	0.82	D	39.4	0.96	C	21.9	0.82
		SEB OVERALL	**C**	**34.1**	**--**	**C**	**21.8**	**--**	**D**	**39.4**	**--**	**C**	**21.9**	**--**	**D**	**39.4**	**--**	**C**	**21.9**	**--**
	MEMORIAL DRIVE	NWB L-T-R	D	45.0	0.74	C	30.2	0.60	D	46.2	0.74	C	30.9	0.62	D	46.2	0.74	C	30.9	0.62
		NWB OVERALL	**D**	**45.0**	**--**	**C**	**30.2**	**--**	**D**	**46.2**	**--**	**C**	**30.9**	**--**	**D**	**46.2**	**--**	**C**	**30.9**	**--**
	OVERALL INTERSECTION		**C**	**25.6**	**--**	**B**	**14.1**	**--**	**C**	**28.9**	**--**	**B**	**14.2**	**--**	**C**	**28.8**	**--**	**B**	**14.0**	**--**
18	NYS ROUTE 141 (BROADWAY) & SPRAIN BROOK PARKWAY SB ON RAMP																			
	UNSIGNALIZED																			
	NYS ROUTE 141	WB L-T	B	11.3	0.19	A	9.7	0.18	B	11.8	0.21	A	9.9	0.19	B	11.9	0.21	B	10.1	0.20
19	NYS ROUTE 141 (BROADWAY) & WEST CROSS STREET																			
	SIGNALIZED																			
	NYS ROUTE 141	EB L-T-R	B	11.0	0.45	B	12.5	0.55	B	11.3	0.47	B	11.5	0.51	B	11.4	0.48	B	11.7	0.52
		EB OVERALL	**B**	**11.0**	**--**	**B**	**12.5**	**--**	**B**	**11.3**	**--**	**B**	**11.5**	**--**	**B**	**11.4**	**--**	**B**	**11.7**	**--**
	NYS ROUTE 141	WB L-T-R	B	11.1	0.49	B	13.6	0.60	B	11.5	0.52	B	11.4	0.52	B	11.6	0.53	B	11.6	0.53
		WB OVERALL	**B**	**11.1**	**--**	**B**	**13.6**	**--**	**B**	**11.5**	**--**	**B**	**11.4**	**--**	**B**	**11.6**	**--**	**B**	**11.6**	**--**
	W CROSS STREET	NB L-T-R	B	10.7	0.43	B	10.3	0.49	B	11.0	0.46	B	10.7	0.43	B	11.2	0.47	B	10.8	0.43
		NB OVERALL	**B**	**10.7**	**--**	**B**	**10.3**	**--**	**B**	**11.0**	**--**	**B**	**10.7**	**--**	**B**	**11.2**	**--**	**B**	**10.8**	**--**
	BROADWAY	SB L-T-R	A	7.5	0.06	A	3.9	0.16	A	7.5	0.06	A	8.2	0.16	A	7.5	0.06	A	8.2	0.16
		SB OVERALL	**A**	**7.5**	**--**	**A**	**3.9**	**--**	**A**	**7.5**	**--**	**A**	**8.2**	**--**	**A**	**7.5**	**--**	**A**	**8.2**	**--**
	OVERALL INTERSECTION		**B**	**10.8**	**--**	**B**	**11.6**	**--**	**B**	**11.1**	**--**	**B**	**11.0**	**--**	**B**	**11.3**	**--**	**B**	**11.1**	**--**

TABLE NO. 2

PHASE 1

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION		YEAR 2019 EXISTING						YEAR 2024 NO-BUILD						YEAR 2024 BUILD - PHASE 1					
			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
			LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
20	NYS ROUTE 9A & PARKVIEW BOULEVARD/BELMONT ROAD																			
	UNSIGNALIZED																			
	NYS ROUTE 9A	NB L-T	B	11.9	0.00	A	0.0	0.00	B	13.0	0.00	A	0.0	0.00	B	14.2	0.00	A	0.0	0.00
	NYS ROUTE 9A	SB L-T	A	8.8	0.00	B	11.9	0.00	A	8.9	0.00	B	12.9	0.00	A	9.2	0.00	B	14.6	0.00
	PARKVIEW BOULEVARD	EB L-T-R	A	0.0	0.00	D	31.0	0.07	A	0.0	0.00	E	40.2	0.09	A	0.0	0.00	F	58.4	0.13
	BELMONT ROAD	WB L-T-R	C	18.5	0.21	C	16.0	0.16	C	21.3	0.25	C	18.0	0.19	D	25.9	0.30	C	21.5	0.23
21	NYS ROUTE 9A & SKYLINE DRIVE (NORTH LEG)																			
	SIGNALIZED																			
	NYS ROUTE 9A	EB T	A	3.9	0.33	A	8.0	0.46	A	4.1	0.35	A	8.7	0.52	A	4.8	0.43	A	9.2	0.56
		EB T-R	A	3.9	0.33	A	7.9	0.46	A	4.1	0.35	A	8.6	0.53	A	4.8	0.43	A	9.2	0.56
		EB OVERALL	**A**	**3.9**	**--**	**A**	**7.9**	**--**	**A**	**4.1**	**--**	**A**	**8.7**	**--**	**A**	**4.8**	**--**	**A**	**9.2**	**--**
	NYS ROUTE 9A	WB L	A	2.7	0.40	A	5.1	0.12	A	3.0	0.44	A	5.9	0.14	A	3.8	0.54	A	6.4	0.19
		WB T	A	5.0	0.69	A	4.9	0.42	A	7.7	0.80	A	5.2	0.46	A	1.8	0.84	A	1.7	0.58
		WB OVERALL	**A**	**4.5**	**--**	**A**	**4.9**	**--**	**A**	**6.8**	**--**	**A**	**5.2**	**--**	**A**	**2.1**	**--**	**A**	**2.0**	**--**
	SKYLINE DRIVE	NB L	E	60.8	0.48	E	63.8	0.76	E	60.6	0.48	E	67.6	0.80	E	59.1	0.44	E	67.6	0.80
		NB R	E	63.6	0.58	F	179.0	1.21	E	63.7	0.59	F	202.6	1.27	E	63.8	0.63	F	221.9	1.32
		NB OVERALL	**E**	**62.3**	**--**	**F**	**131.4**	**--**	**E**	**62.2**	**--**	**F**	**147.0**	**--**	**E**	**61.8**	**--**	**F**	**159.7**	**--**
	OVERALL INTERSECTION		**A**	**6.5**	**--**	**C**	**32.7**	**--**	**A**	**7.9**	**--**	**D**	**35.1**	**--**	**A**	**5.2**	**--**	**C**	**34.4**	**--**
22	NYS ROUTE 9A & SAW MILL RIVER PKWY. NB ON/OFF RAMPS 1824 DRIVEWAY																			
	SIGNALIZED																			
	SMRP NB ON/OFF RAMPS	SEB L	D	53.6	0.76	D	53.5	0.84	D	53.9	0.77	D	53.4	0.84	E	57.7	0.81	D	54.3	0.85
		SEB L-T-R	E	68.8	0.90	A	0.0	0.00	E	70.6	0.90	A	0.0	0.00	F	87.1	0.97	A	0.0	0.00
		SEB OVERALL	**E**	**61.8**	**--**	**D**	**53.5**	**--**	**E**	**62.9**	**--**	**D**	**53.4**	**--**	**E**	**73.8**	**--**	**D**	**54.3**	**--**
	1824 DRIVEWAY	NWB L	E	56.9	0.31	E	56.5	0.33	E	57.0	0.33	E	57.0	0.36	E	57.0	0.33	E	57.0	0.36
		NWB L-T	E	57.2	0.37	A	0.0	0.00	E	57.3	0.38	E	57.4	0.43	E	57.3	0.38	E	57.4	0.43
		NWB R	D	52.2	0.15	D	52.5	0.22	D	52.1	0.16	D	52.3	0.23	D	52.1	0.16	D	52.3	0.23
		NWB OVERALL	**E**	**55.7**	**--**	**E**	**55.0**	**--**	**E**	**55.8**	**--**	**E**	**55.7**	**--**	**E**	**55.8**	**--**	**E**	**55.7**	**--**
	NYS ROUTE 9A	NEB L	B	11.2	0.24	A	8.9	0.54	B	13.0	0.30	B	10.2	0.60	B	15.4	0.34	B	14.3	0.69
		NEB T	B	13.8	0.31	B	11.6	0.39	B	14.7	0.34	B	12.9	0.46	B	17.3	0.41	B	13.8	0.49
		NEB T-R	B	13.8	0.31	B	11.5	0.39	B	14.7	0.34	B	12.9	0.46	B	17.3	0.41	B	13.7	0.49
		NEB OVERALL	**B**	**13.4**	**--**	**B**	**10.9**	**--**	**B**	**14.4**	**--**	**B**	**12.2**	**--**	**B**	**17.1**	**--**	**B**	**13.9**	**--**
	NYS ROUTE 9A	SWB L	A	9.7	0.10	A	9.0	0.13	B	10.2	0.12	A	9.8	0.16	B	11.9	0.13	B	10.4	0.17
		SWB T	B	15.9	0.49	B	13.7	0.37	B	17.5	0.58	B	14.8	0.40	C	20.1	0.63	B	16.7	0.50
		SWB T-R	B	15.9	0.49	B	13.7	0.37	B	17.5	0.58	B	14.8	0.41	C	20.0	0.63	B	16.6	0.50
		SWB OVERALL	**B**	**15.5**	**--**	**B**	**13.3**	**--**	**B**	**17.1**	**--**	**B**	**14.4**	**--**	**B**	**19.6**	**--**	**B**	**16.3**	**--**
	OVERALL INTERSECTION		**C**	**26.7**	**--**	**B**	**19.2**	**--**	**C**	**27.4**	**--**	**C**	**20.1**	**--**	**C**	**32.7**	**--**	**C**	**21.4**	**--**
23	NYS ROUTE 9A & SKYLINE DRIVE (SOUTH LEG)																			
	UNSIGNALIZED																			
	NYS ROUTE 9A	SB L-T	A	9.0	0.08	B	12.0	0.02	A	9.1	0.09	B	13.2	0.02	A	9.4	0.09	B	13.6	0.02
	SKYLINE DRIVE	WB L	D	27.0	0.24	F	237.2	1.32	D	34.8	0.31	F	433.8	1.76	E	42.7	0.37	F	612.7	2.14
	SKYLINE DRIVE	WB R	A	9.9	0.02	B	13.3	0.13	B	10.0	0.02	B	14.6	0.15	B	10.3	0.02	C	15.0	0.16
24	NYS ROUTE 9A & DANA ROAD / HOME DEPOT DRIVEWAY																			
	SIGNALIZED																			
	HOME DEPOT DRWY	EB L-T	F	164.1	1.12	F	422.1	1.77	F	205.2	1.22	F	531.2	2.00	F	227.6	1.27	F	556.3	2.06
		EB R	B	15.5	0.21	B	14.2	14.20	B	17.2	0.23	B	17.1	0.25	B	18.9	0.24	B	18.2	0.26
		EB OVERALL	**F**	**83.2**	**--**	**F**	**226.8**	**--**	**F**	**102.8**	**--**	**F**	**285.3**	**--**	**F**	**113.9**	**--**	**F**	**298.9**	**--**
	DANA ROAD	WB L-T	E	65.2	0.78	F	931.5	2.91	F	96.5	0.88	F	1188.7	3.47	F	111.4	0.92	F	1231.4	3.56
		WB R	B	13.9	0.13	B	15.0	0.23	B	15.3	0.14	B	18.0	0.27	B	16.9	0.14	B	19.1	0.28
		WB OVERALL	**D**	**35.5**	**--**	**F**	**537.4**	**--**	**D**	**49.8**	**--**	**F**	**689.9**	**--**	**E**	**57.1**	**--**	**F**	**714.9**	**--**
	NYS ROUTE 9A	NB L	B	15.5	0.40	B	15.2	0.46	B	15.9	0.45	B	14.5	0.47	B	15.8	0.46	B	15.6	0.54
		NB T	C	26.4	0.72	C	23.8	0.68	C	26.7	0.74	C	23.8	0.71	C	26.7	0.76	C	23.8	0.72
		T-R	C	26.4	0.72	C	23.7	0.68	C	26.7	0.74	C	23.7	0.71	C	26.7	0.76	C	23.7	0.72
		NB OVERALL	**C**	**24.8**	**--**	**C**	**22.4**	**--**	**C**	**25.1**	**--**	**C**	**22.3**	**--**	**C**	**25.2**	**--**	**C**	**22.5**	**--**
	NYS ROUTE 9A	SB L	B	17.3	0.58	B	16.6	0.46	B	17.9	0.63	B	17.0	0.51	B	18.6	0.66	B	17.3	0.53
		SB T / T	C	20.5	0.55	C	21.2	0.53	C	21.1	0.62	C	20.1	0.51	C	20.7	0.62	C	21.2	0.61
		SB R	B	16.6	0.15	B	17.3	0.12	B	16.1	0.15	B	16.3	0.11	B	15.5	0.14	B	15.9	0.11
		SB OVERALL	**B**	**19.5**	**--**	**C**	**20.1**	**--**	**C**	**20.1**	**--**	**B**	**19.3**	**--**	**B**	**19.9**	**--**	**C**	**20.3**	**--**
	OVERALL INTERSECTION		**C**	**28.8**	**--**	**F**	**123.2**	**--**	**C**	**31.6**	**--**	**F**	**151.1**	**--**	**C**	**32.5**	**--**	**F**	**147.2**	**--**
25	HOSPITAL ROAD & SUNSHINE COTTAGE ROAD																			
	UNSIGNALIZED																			
	SUNSHINE COTTAGE RD.	EB L-T	A	7.4	0.06	A	8.1	0.13	A	7.5	0.07	A	8.2	0.15	A	7.5	0.08	A	8.2	0.16
	HOSPITAL ROAD	SB L	B	11.6	0.17	C	15.5	0.09	B	12.3	0.19	C	16.5	0.10	B	12.6	0.20	C	17.2	0.11
		SB R	A	9.0	0.15	A	9.8	0.13	A	9.1	0.16	B	10.0	0.17	A	9.1	0.17	B	10.1	0.18
26	DANA ROAD & HAMMOND HOUSE ROAD																			
	UNSIGNALIZED																			
	DANA ROAD	EB L-T	B	10.4	0.39	A	8.5	0.08	B	11.1	0.43	A	8.7	0.10	B	11.3	0.45	A	8.9	0.12
	DANA ROAD	WB T-R	A	7.7	0.02	A	8.7	0.19	A	7.8	0.02	A	8.9	0.21	A	7.8	0.02	A	9.0	0.21
	HAMMOND HOUSE ROAD	SB L-R	A	8.6	0.21	A	9.0	0.36	A	8.9	0.23	A	9.6	0.41	A	9.0	0.24	A	9.9	0.43
27	DANA ROAD & WALKER ROAD																			
	UNSIGNALIZED																			
	DANA ROAD	WB L-T	A	8.1	0.02	A	7.9	0.07	A	8.2	0.02	A	8.0	0.08	A	8.2	0.02	A	8.0	0.09
	WALKER ROAD	NB L-R	B	13.2	0.36	C	17.1	0.33	B	14.2	0.40	C	19.3	0.38	B	14.5	0.42	C	19.9	0.41

TABLE NO. 2

PHASE 1

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION		YEAR 2019 EXISTING						YEAR 2024 NO-BUILD						YEAR 2024 BUILD - PHASE 1					
			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
			LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
28	NYS ROUTE 100 (BRADHURST AVENUE) & LAKEVIEW AVENUE																			
	UNSIGNALIZED																			
	NYS ROUTE 100	SB L-T	A	8.0	0.02	A	8.2	0.02	A	8.0	0.03	A	8.3	0.02	A	8.1	0.03	A	8.3	0.02
	LAKEVIEW AVENUE	SWB L-R	C	24.0	0.44	C	20.8	0.46	D	27.4	0.49	C	23.6	0.51	D	32.0	0.55	D	28.7	0.59
29	NYS ROUTE 100 (BRADHURST AVENUE) NYS ROUTE 100A (KNOLLWOOD ROAD) NYS ROUTE 100C (GRASSLANDS ROAD)																			
	SIGNALIZED *																			
	NYS ROUTE 100C	EB L	C	20.7	0.63	B	18.4	0.39	C	25.3	0.72	B	19.2	0.43	C	26.3	0.74	B	19.4	0.44
		EB T	D	53.2	0.96	D	40.4	0.87	F	65.8	1.02	D	52.5	0.96	F	65.8	1.02	D	52.5	0.96
		EB R	B	19.5	0.55	B	15.2	0.34	C	20.0	0.58	B	15.5	0.35	C	20.0	0.58	B	15.5	0.35
		EB OVERALL	**D**	**38.0**	**--**	**C**	**31.3**	**--**	**D**	**46.0**	**--**	**D**	**39.4**	**--**	**D**	**46.1**	**--**	**D**	**39.5**	**--**
	NYS ROUTE 100	WB L	C	24.7	0.20	C	21.7	0.24	C	25.6	0.23	C	24.2	0.31	C	25.6	0.23	C	24.2	0.31
		WB T-R	C	32.8	0.68	C	28.3	0.65	D	37.5	0.77	C	29.9	0.69	D	38.6	0.79	C	30.4	0.71
		WB OVERALL	**C**	**32.3**	**--**	**C**	**27.7**	**--**	**D**	**36.8**	**--**	**C**	**29.4**	**--**	**D**	**37.8**	**--**	**C**	**29.9**	**--**
	NYS ROUTE 100A	NB L*	E	64.0	0.90	D	51.6	0.84	E	75.5	0.94	E	58.7	0.88	E	75.5	0.94	E	59.2	0.88
		NB T-R*	D	43.8	0.68	C	33.7	0.45	D	46.1	0.72	C	34.3	0.49	D	48.4	0.75	D	35.5	0.53
		NB OVERALL	**D**	**53.9**	**--**	**D**	**42.8**	**--**	**E**	**60.7**	**--**	**D**	**46.7**	**--**	**E**	**61.6**	**--**	**D**	**47.3**	**--**
	NYS ROUTE 100	SB L	C	32.4	0.58	C	31.8	0.22	C	34.0	0.63	C	31.7	0.24	D	36.0	0.67	C	31.5	0.29
		SB T-R	F	139.0	1.14	F	131.9	1.13	F	161.7	1.20	F	154.1	1.19	F	170.9	1.22	F	168.7	1.23
		SB OVERALL	**F**	**100.4**	**--**	**F**	**115.5**	**--**	**F**	**115.7**	**--**	**F**	**133.7**	**--**	**F**	**121.8**	**--**	**F**	**143.0**	**--**
	OVERALL INTERSECTION		**D**	**51.3**	**--**	**D**	**47.2**	**--**	**E**	**59.4**	**--**	**D**	**54.7**	**--**	**E**	**61.2**	**--**	**E**	**57.3**	**--**
30	NYS ROUTE 100C (GRASSLANDS ROAD) & SPRAIN BROOK PKWY NB ON/OFF RAMPS																			
	SIGNALIZED *																			
	NYS ROUTE 100C	EB L	B	16.4	0.09	A	9.8	0.23	B	16.7	0.11	B	10.9	0.32	B	16.7	0.11	B	10.9	0.32
		EB T / T	B	17.9	0.46	A	8.8	0.31	B	18.3	0.49	A	9.7	0.35	B	18.3	0.49	A	9.7	0.35
		EB OVERALL	**B**	**17.8**	**--**	**A**	**8.9**	**--**	**B**	**18.2**	**--**	**A**	**9.9**	**--**	**B**	**18.2**	**--**	**A**	**9.8**	**--**
	NYS ROUTE 100C	WB T / T	C	20.9	0.40	B	13.6	0.35	C	21.4	0.45	B	15.3	0.39	C	21.3	0.45	B	15.2	0.39
		WB R	B	18.3	0.14	B	12.1	0.16	B	18.4	0.15	B	13.5	0.18	B	18.4	0.15	B	13.5	0.18
		WB OVERALL	**C**	**20.5**	**--**	**B**	**13.3**	**--**	**C**	**21.0**	**--**	**B**	**14.9**	**--**	**C**	**21.0**	**--**	**B**	**14.9**	**--**
	SBP NB OFF RAMP	NB L-T	F	72.8	1.03	C	33.7	0.55	F	237.1	1.44	C	34.2	0.63	F	237.1	1.44	C	34.1	0.63
		NB R*	C	33.4	0.78	D	42.0	0.83	D	36.3	0.82	D	41.4	0.82	D	36.3	0.82	D	41.4	0.82
		NB OVERALL	**E**	**57.5**	**--**	**D**	**38.4**	**--**	**F**	**172.3**	**--**	**D**	**38.0**	**--**	**F**	**172.3**	**--**	**D**	**38.0**	**--**
	OVERALL INTERSECTION		**D**	**36.3**	**--**	**B**	**18.3**	**--**	**F**	**93.9**	**--**	**B**	**19.3**	**--**	**F**	**93.9**	**--**	**B**	**19.3**	**--**
31	NYS ROUTE 100C (GRASSLANDS ROAD) & SPRAIN BROOK PKWY SB ON/OFF RAMPS																			
	SIGNALIZED																			
	SBP SB ON/OFF RAMPS	SB L	D	43.6	0.84	D	45.4	0.82	D	43.1	0.85	D	45.1	0.83	D	43.1	0.85	D	45.1	0.83
		SB R	D	41.7	0.73	D	40.6	0.38	D	43.4	0.85	D	40.4	0.41	D	43.4	0.85	D	40.3	0.41
		SB OVERALL	**D**	**42.8**	**--**	**D**	**44.0**	**--**	**D**	**43.2**	**--**	**D**	**43.6**	**--**	**D**	**43.2**	**--**	**D**	**43.6**	**--**
	NYS ROUTE 100C	SEB T / T	A	5.0	0.33	A	6.1	0.62	A	5.5	0.36	A	8.2	0.77	A	5.5	0.36	A	8.2	0.77
		SEB OVERALL	**A**	**5.0**	**--**	**A**	**6.1**	**--**	**A**	**5.5**	**--**	**A**	**8.2**	**--**	**A**	**5.5**	**--**	**A**	**8.2**	**--**
	NYS ROUTE 100C	NWB T / T	A	5.5	0.42	A	3.6	0.25	A	7.0	0.54	A	4.0	0.28	A	7.0	0.54	A	4.0	0.28
		NWB R (FREE)	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		NWB OVERALL	**A**	**5.5**	**--**	**A**	**3.6**	**--**	**A**	**7.0**	**--**	**A**	**4.0**	**--**	**A**	**7.0**	**--**	**A**	**4.0**	**--**
	OVERALL INTERSECTION		**B**	**12.2**	**--**	**A**	**9.3**	**--**	**B**	**12.7**	**--**	**B**	**10.4**	**--**	**B**	**12.7**	**--**	**B**	**10.4**	**--**
32	NYS ROUTE 100C (GRASSLANDS ROAD) & WOODS ROAD/TAYLOR ROAD																			
	SIGNALIZED																			
	NYS ROUTE 100C	EB L	A	5.7	0.31	B	11.4	0.09	B	12.0	0.48	B	12.9	0.12	B	12.6	0.51	B	13.1	0.16
		EB T	A	2.5	0.25	B	16.4	0.66	A	2.7	0.28	C	26.4	0.86	A	2.7	0.28	C	26.4	0.86
		T-R	A	0.0	0.00	B	16.3	0.66	A	0.0	0.00	C	26.0	0.86	A	0.0	0.00	C	26.0	0.86
		EB OVERALL	**A**	**2.9**	**--**	**B**	**16.3**	**--**	**A**	**4.1**	**--**	**C**	**26.0**	**--**	**A**	**4.3**	**--**	**C**	**25.9**	**--**
	NYS ROUTE 100C	WB L	A	4.1	0.01	C	22.7	0.04	A	4.3	0.01	D	36.6	0.06	A	4.4	0.01	D	36.6	0.06
		WB T	A	7.9	0.53	B	16.4	0.45	B	10.6	0.68	B	18.9	0.52	B	10.8	0.69	B	19.4	0.53
		WB T-R	A	8.0	0.54	B	16.4	0.45	B	11.0	0.70	B	18.9	0.52	B	11.1	0.70	B	19.4	0.53
		WB OVERALL	**A**	**7.9**	**--**	**B**	**16.5**	**--**	**B**	**10.8**	**--**	**B**	**19.1**	**--**	**B**	**10.9**	**--**	**B**	**19.5**	**--**
	TAYLOR ROAD	NB L-T-R	D	42.6	0.04	C	28.0	0.03	D	42.0	0.04	C	27.2	0.03	D	42.0	0.04	C	27.2	0.03
		NB OVERALL	**D**	**42.6**	**--**	**C**	**28.0**	**--**	**D**	**42.0**	**--**	**C**	**27.2**	**--**	**D**	**42.0**	**--**	**C**	**27.2**	**--**
	WOODS ROAD	SB L-T	D	45.6	0.48	D	35.9	0.69	D	45.3	0.50	D	36.2	0.71	D	45.2	0.49	D	36.2	0.71
		SB R	D	40.5	0.21	C	25.2	0.14	D	39.7	0.22	C	24.0	0.16	D	39.7	0.25	C	23.7	0.18
		SB OVERALL	**D**	**44.1**	**--**	**C**	**33.3**	**--**	**D**	**43.6**	**--**	**C**	**32.8**	**--**	**D**	**43.4**	**--**	**C**	**32.5**	**--**
	OVERALL INTERSECTION		**A**	**8.6**	**--**	**B**	**18.4**	**--**	**B**	**10.6**	**--**	**C**	**24.7**	**--**	**B**	**10.8**	**--**	**C**	**24.8**	**--**
33	NYS ROUTE 100C (GRASSLANDS ROAD) & WALKER ROAD/CLEARBROOK ROAD																			
	SIGNALIZED																			
	NYS ROUTE 100C	EB L	C	24.4	0.11	C	26.7	0.04	C	25.0	0.12	C	33.2	0.06	C	25.0	0.14	C	33.5	0.10
		EB T-R	D	37.7	0.87	F	69.9	1.04	E	56.2	0.98	F	261.0	1.51	E	59.0	1.00	F	267.6	1.52
		EB OVERALL	**D**	**36.5**	**--**	**E**	**69.0**	**--**	**D**	**53.6**	**--**	**F**	**257.4**	**--**	**E**	**55.9**	**--**	**F**	**261.5**	**--**
	NYS ROUTE 100C	WB L	C	23.9	0.44	C	33.4	0.49	C	26.8	0.53	D	35.4	0.55	C	27.0	0.53	D	35.4	0.55
		WB T-R	F	174.8	1.31	C	34.8	0.85	F	389.1	1.8	D	53.1	0.98	F	393.8	1.81	E	56.5	0.99
		WB OVERALL	**F**	**142.9**	**--**	**C**	**34.5**	**--**	**F**	**327.9**	**--**	**D**	**49.9**	**--**	**F**	**332.1**	**--**	**D**	**52.7**	**--**
	CLEARBROOK ROAD	NB L-T	D	35.6	0.30	D	36.0	0.52	D	35.2	0.31	D	36.1	0.53	D	35.2	0.31	D	36.1	0.53
		NB R	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		NB OVERALL	**D**	**35.6**	**--**	**D**	**36.0**	**--**	**D**	**35.2**	**--**	**D**	**36.1**	**--**	**D**	**35.2**	**--**	**D**	**36.1**	**--**
	WALKER ROAD	SB L-T	D	35.1	0.57	C	29.4	0.61	C	34.7	0.58	C	29.1	0.62	C	34.7	0.58	C	29.1	0.62
		R	C	30.5	0.06	C	22.6	0.04	C	29.9	0.06	C	21.9	0.05	C	29.9	0.06	C	21.9	0.05
		SB OVERALL	**C**	**34.7**	**--**	**C**	**29.0**	**--**	**C**	**34.3**	**--**	**C**	**28.6**	**--**	C	34.3	--	C	**28.6**	**--**
	OVERALL INTERSECTION		**F**	**98.9**	**--**	**D**	**47.2**	**--**	**F**	**223.8**	**--**	**F**	**140.7**	**--**	**F**	**226.3**	**--**	**F**	**144.3**	**--**

NOTES:

1) THE ABOVE REPRESENTS THE LEVELS OF SERVICE AND VEHICLE DELAY IN SECONDS, B [13.2] FOR EACH MOVEMENT, FOR EACH APPROACH AS WELL AS FOR THE OVERALL INTERSECTION FOR THE SIGNALIZED INTERSECTIONS AND
THE LEVELS OF SERVICE AND AVERAGE TOTAL DELAY IN SECONDS, B[10.9] FOR THE UNSIGNALIZED INTERSECTIONS.

* INTERSECTION 30 - NORTHBOUND RIGHT TURN VOLUME IS LESS THAN THE DEMAND DUE TO THE OPERATION OF THE NYS ROUTE 100C / NYS ROUTE 100A / NYS ROUTE 100 INTERSECTION (INTERSECTION 29)

TABLE NO. 4

PHASE 2

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION		YEAR 2039 NO-BUILD						YEAR 2039 BUILD - PHASE 2					
			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
			LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
1	NYS ROUTE 100 (BRADHURST AVENUE) & SBP SB ON/OFF RAMPS													
	UNSIGNALIZED													
	NYS ROUTE 100	NB L-T	A	9.0	0.00	A	7.4	0.00	A	8.9	0.00	A	7.5	0.00
	SBP SB OFF RAMP	EB L-R	B	14.0	0.08	B	11.7	0.05	B	13.7	0.08	B	12.0	0.05
2	NYS ROUTE 100 (BRADHURST AVENUE) & SBP NB ON RAMP													
	UNSIGNALIZED													
	NYS ROUTE 100	NB L-T	B	11.2	0.15	A	8.4	0.23	B	12.7	0.24	A	9.3	0.34
3	NYS ROUTE 100 (BRADHURST AVENUE) & HOSPITAL ROAD													
	SIGNALIZED													
	HOSPITAL ROAD	EB L	B	19.7	0.52	D	47.3	0.97	--	--	--	--	--	--
		EB R	C	23.3	0.82	B	13.9	0.14	--	--	--	--	--	--
		EB OVERALL	**C**	**21.7**	**--**	**D**	**44.1**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
	NYS ROUTE 100	NB L-T	F	172.3	1.24	D	41.9	0.90	--	--	--	--	--	--
		NB OVERALL	**F**	**172.3**	**--**	**D**	**41.9**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
	NYS ROUTE 100	SB T-R	F	51.9	1.03	B	15.1	0.29	--	--	--	--	--	--
		SB OVERALL	**D**	**51.9**	**--**	**B**	**15.1**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
	OVERALL INTERSECTION		**D**	**54.4**	**--**	**D**	**39.3**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
	W/ SIGNAL TIMING IMPROVEMENTS													
	HOSPITAL ROAD	EB L	--	--	--	--	--	--	F	170.1	1.21	F	90.5	1.09
		R	--	--	--	--	--	--	F	455.6	1.87	C	20.3	0.33
		EB OVERALL	**--**	**--**	**--**	**--**	**--**	**--**	**F**	**330.0**	**--**	**E**	**77.6**	**--**
	NYS ROUTE 100	NB L-T	--	--	--	--	--	--	F	92.8	1.01	E	58.9	0.96
		NB OVERALL	**--**	**--**	**--**	**--**	**--**	**--**	**F**	**92.8**	**--**	**E**	**58.9**	**--**
	NYS ROUTE 100	SB T-R	--	--	--	--	--	--	B	14.7	0.85	B	16.6	0.36
		SB OVERALL	**--**	**--**	**--**	**--**	**--**	**--**	**B**	**14.7**	**--**	**B**	**16.6**	**--**
	OVERALL INTERSECTION		**--**	**--**	**--**	**--**	**--**	**--**	**F**	**126.3**	**--**	**E**	**61.9**	**--**
	W/ ROUNDABOUT		**--**	**--**	**--**	**--**	**--**	**--**	**D**	**31.8**	**--**	**A**	**9.0**	**--**
4	NYS ROUTE 100 (BRADHURST AVENUE) & 19 BRADHURST DRIVEWAY													
	UNSIGNALIZED													
	NYS ROUTE 100	NWB L-T	A	9.7	0.07	A	7.8	0.01	A	9.9	0.07	A	8.1	0.01
	19 BRADHURST DRWY	EB L	D	27.4	0.26	E	37.6	0.81	E	36.3	0.33	F	122.1	1.12
	19 BRADHURST DRWY	EB R	B	13.8	0.04	A	9.8	0.11	B	14.4	0.05	B	11.0	0.14
5	HOSPITAL ROAD & SBP NB OFF RAMP													
	UNSIGNALIZED													
	SBP NB OFF RAMP	NB L-R	F	301.8	1.60	F	83.5	1.04	F	1020.6	3.19	F	286.7	1.54
	W/ ROUNDABOUT AT INTERSECTION #3		**--**	**--**	**--**	**--**	**--**	**--**	**F**	**174.5**	**1.33**	**F**	**81.8**	**1.04**
6	HOSPITAL ROAD & SBP SB ON RAMP													
	UNSIGNALIZED													
	HOSPITAL ROAD	WB L	A	8.5	0.05	B	11.1	0.24	A	9.0	0.05	B	13.4	0.27
7	HOSPITAL ROAD & WOODS ROAD													
	UNSIGNALIZED													
	HOSPITAL ROAD	EB T-R	B	10.3	0.27	D	32.4	0.84	--	--	--	--	--	--
	HOSPITAL ROAD	WB L	C	16.9	0.61	B	13.6	0.33	--	--	--	--	--	--
	HOSPITAL ROAD	WB T	C	23.1	0.77	B	12.4	0.30	--	--	--	--	--	--
	WOODS ROAD	NB L-R	B	11.1	0.27	C	21.4	0.70	--	--	--	--	--	--
									--	--	--	--	--	--
	OVERALL INTERSECTION		**C**	**17.8**	**--**	**C**	**23.7**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
	W/SIGNALIZATION W/ IMPROVEMENTS													
	HOSPITAL ROAD	EB L	--	--	--	--	--	--	C	25.1	0.14	B	11.6	0.03
		EB T	--	--	--	--	--	--	C	3.8	0.42	C	22.2	0.71
		EB T-R	--	--	--	--	--	--	C	24.1	0.43	C	22.5	0.71
		EB APPROACH	**--**	**--**	**--**	**--**	**--**	**--**	**C**	**2.6**	**--**	**C**	**22.2**	**--**
	HOSPITAL ROAD	WB L	--	--	--	--	--	--	B	3.8	0.54	B	16.4	0.42
		WB T-R	--	--	--	--	--	--	D	46.6	0.97	B	13.7	0.33
		WB APPROACH	**--**	**--**	**--**	**--**	**--**	**--**	**D**	**39.3**	**--**	**B**	**14.4**	**--**
	WOODS ROAD	NB L-T	--	--	--	--	--	--	D	49.8	0.83	D	38.1	0.69
		NB R	--	--	--	--	--	--	C	24.4	0.29	C	29.0	0.48
		NB APPROACH	**--**	**--**	**--**	**--**	**--**	**--**	**D**	**40.9**	**--**	**C**	**33.5**	**--**
	WOODS ROAD	SB L-T-R	--	--	--	--	--	--	C	28.2	0.20	C	28.8	0.22
		SB APPROACH	**--**	**--**	**--**	**--**	**--**	**--**	**C**	**28.2**	**--**	**C**	**28.8**	**--**
	OVERALL INTERSECTION		**--**	**--**	**--**	**--**	**--**	**--**	**D**	**35.9**	**--**	**C**	**23.0**	**--**

TABLE NO. 4

PHASE 2

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION			YEAR 2039 NO-BUILD						YEAR 2039 BUILD - PHASE 2					
				WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
				LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
8	HOSPITAL ROAD WESTCHESTER MEDICAL CENTER LOT 10 PROPOSED DRIVEWAY #2														
	UNSIGNALIZED														
	HOSPITAL ROAD	EB	L	--	--	--	--	--	--	--	--	--	--	--	--
	HOSPITAL ROAD	WB	L	A	7.7	0.05	A	8.4	0.04	--	--	--	--	--	--
	WMC LOT 10	NB	L-T-R	A	8.2	0.03	A	9.2	0.12	--	--	--	--	--	--
	PROP DRWY #2	SB	L-R	--	--	--	--	--	--	--	--	--	--	--	--
	W/SIGNALIZATION														
	HOSPITAL ROAD	EB	L	--	--	--	--	--	--	A	7.3	0.30	C	22.5	0.51
			T	--	--	--	--	--	--	A	6.1	0.14	C	21.0	0.45
			R	--	--	--	--	--	--	A	5.5	0.03	B	16.7	0.02
		EB	**APPROACH**	--	--	--	--	--	--	**A**	**6.4**	**--**	**C**	**21.3**	**--**
	HOSPITAL ROAD	WB	L	--	--	--	--	--	--	A	0.1	0.10	D	35.1	0.11
			T	--	--	--	--	--	--	A	1.1	0.67	D	39.5	0.45
			R	--	--	--	--	--	--	A	0.6	0.49	D	43.5	0.58
		WB	**APPROACH**	--	--	--	--	--	--	**A**	**0.9**	**--**	**D**	**41.3**	**--**
	WMC LOT 10	NB	L-T-R	--	--	--	--	--	--	C	30.0	0.02	D	14.1	0.05
		NB	**APPROACH**	--	--	--	--	--	--	**C**	**30.0**	**--**	**D**	**14.1**	**--**
	PROP DRWY #2	SB	L-T-R	--	--	--	--	--	--	D	45.9	0.72	C	32.0	0.84
		SB	**APPROACH**	--	--	--	--	--	--	**D**	**45.9**	**--**	**C**	**32.0**	**--**
	OVERALL INTERSECTION			--	--	--	--	--	--	**A**	**7.8**	**--**	**C**	**30.0**	**--**
9	HOSPITAL ROAD & PROPOSED ROUTE 9A CONNECTOR														
	SIGNALIZED														
	HOSPITAL ROAD	NEB	L	--	--	--	--	--	--	A	5.6	0.30	B	11.7	0.27
		NEB	T	--	--	--	--	--	--	A	3.5	0.10	A	9.8	0.17
		NEB	**APPROACH**	--	--	--	--	--	--	**A**	**4.3**	**--**	**B**	**10.4**	**--**
	HOSPITAL ROAD	SWB	T	--	--	--	--	--	--	A	8.4	0.34	B	16.6	0.26
		SWB	R	--	--	--	--	--	--	A	9.0	0.39	B	16.3	0.23
		SWB	**APPROACH**	--	--	--	--	--	--	**A**	**8.7**	**--**	**B**	**16.5**	**--**
	ROUTE 9A CONNECTOR	SEB	L	--	--	--	--	--	--	D	47.4	0.83	D	43.9	0.91
		SEB	R	--	--	--	--	--	--	D	44.4	0.72	C	27.0	0.37
		SEB	**APPROACH**	--	--	--	--	--	--	**D**	**46.1**	**--**	**D**	**39.4**	**--**
	OVERALL INTERSECTION			--	--	--	--	--	--	**B**	**16.6**	**--**	**C**	**24.7**	**--**
10	PROPOSED ROUTE 9A CONNECTOR & PROPOSED DRIVEWAY #3														
	UNSIGNALIZED														
	ROUTE 9A CONNECTOR	SB	L	--	--	--	--	--	--	A	9.5	0.20	A	8.3	0.11
	PROP DRWY #3	WB	L	--	--	--	--	--	--	F	56.3	0.64	F	192.1	1.28
			R	--	--	--	--	--	--	B	12.4	0.18	B	12.3	0.33
11	PROPOSED ROUTE 9A CONNECTOR & PROPOSED DRIVEWAY #4														
	UNSIGNALIZED														
	ROUTE 9A CONNECTOR	SB	L	--	--	--	--	--	--	A	9.1	0.20	A	8.6	0.04
	PROP DRWY #4	WB	L	--	--	--	--	--	--	E	41.9	0.43	F	59.6	0.89
			R	--	--	--	--	--	--	B	10.5	0.08	C	16.2	0.44
12	NYS ROUTE 9A & ROSEDALE NURSERIES														
	UNSIGNALIZED														
	NYS ROUTE 9A	EB	L-T	B	13.5	0.03	A	8.7	0.01	--	--	--	--	--	--
			T-R	A	0.3	0.00	A	0.1	0.00	--	--	--	--	--	--
	ROSEDALE NURSERIES	SB	L-T-R	F	54.5	0.06	D	28.1	0.24	--	--	--	--	--	--
	W/ PROPOSED ROUTE 9A CONNECTOR W/ SIGNALIZATION														
	NYS ROUTE 9A	EB	L-T	--	--	--	--	--	--	A	5.1	0.33	A	7.3	0.16
		EB	T-R	--	--	--	--	--	--	A	5.5	0.48	A	7.7	0.61
		EB	**APPROACH**	--	--	--	--	--	--	**A**	**5.3**	**--**	**A**	**7.5**	**--**
	NYS ROUTE 9A	WB	L-T	--	--	--	--	--	--	F	130.3	1.07	B	19.0	0.54
		WB	T-R	--	--	--	--	--	--	B	14.8	0.84	A	6.3	0.45
		WB	APPROACH	--	--	--	--	--	--	**E**	**65.8**	**--**	**A**	**9.7**	**--**
	ROUTE 9A CONNECTOR	NB	L	--	--	--	--	--	--	E	55.3	0.60	E	79.9	0.98
	ROUTE 9A CONNECTOR	NB	R	--	--	--	--	--	--	D	50.8	0.50	C	28.9	0.47
		NB	**APPROACH**	--	--	--	--	--	--	**D**	**53.2**	**--**	**E**	**57.2**	**--**
	ROSEDALE NURSERIES	SB	L-T-R	--	--	--	--	--	--	D	46.8	0.03	D	42.9	0.49
		SB	**APPROACH**	--	--	--	--	--	--	**D**	**46.8**	**--**	**D**	**42.9**	**--**
	OVERALL INTERSECTION			--	--	--	--	--	--	**D**	**44.1**	**--**	**C**	**20.1**	**--**

TABLE NO. 4

PHASE 2

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION		YEAR 2039 NO-BUILD						YEAR 2039 BUILD - PHASE 2					
			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
			LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
13	NYS ROUTE 100 (BRADHURST AVENUE) & JOYCE PLACE													
	UNSIGNALIZED													
	NYS ROUTE 100	NB L-T	A	10.0	0.08	A	8.3	0.06	A	9.8	0.08	A	8.4	0.07
	JOYCE PLACE	EB L-R	C	17.3	0.20	B	13.1	0.22	C	16.8	0.19	B	13.4	0.23
14	NYS ROUTE 100 (BRADHURST AVENUE) & BROAD STREET													
	UNSIGNALIZED													
	NYS ROUTE 100	NB L-T-R	A	0.0	0.00	A	8.3	0.01	A	9.2	0.00	A	8.4	0.01
	NYS ROUTE 100	SB L-T-R	A	7.6	0.00	A	8.9	0.01	A	7.6	0.00	A	8.8	0.01
	BROAD STREET	EB L-T-R	B	13.9	0.02	C	15.2	0.04	B	13.4	0.03	B	14.3	0.05
	BROAD STREET	WB L-T-R	C	18.4	0.07	C	23.2	0.11	C	18.1	0.07	C	24.4	0.13
15	NYS ROUTE 100 (BRADHURST AVENUE) & CHELSEA STREET													
	UNSIGNALIZED													
	NYS ROUTE 100	NB L-T-R	A	0.0	0.00	A	7.9	0.00	A	8.9	0.00	A	7.9	0.01
	NYS ROUTE 100	SB L-T-R	A	7.8	0.04	A	8.9	0.03	A	7.8	0.04	A	8.8	0.03
	CHELSEA STREET	EB L-T-R	B	14.7	0.04	B	13.8	0.04	B	13.8	0.04	B	13.0	0.05
	CHELSEA STREET	WB L-T-R	F	109.5	0.97	F	104.2	1.00	F	90.4	0.91	F	113.9	1.03
16	NYS ROUTE 100 (BRADHURST AVENUE) & BRIGHTON AVENUE													
	UNSIGNALIZED													
	NYS ROUTE 100	SB L-T	A	0.0	0.00	A	0.0	0.00	A	7.5	0.01	A	0.0	0.00
	BRADHURST AVENUE	WB L-R	D	32.6	0.49	C	19.9	0.33	E	36.8	0.66	C	18.4	0.36
17	NYS ROUTE 141 (BROADWAY) & BRADHURST AVENUE/MEMORIAL DRIVE													
	SIGNALIZED													
	BRADHURST AVENUE	EB L-T-R	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		EB OVERALL	**A**	**0.0**	**--**	**A**	**0.0**	**--**	**A**	**0.0**	**--**	**A**	**0.0**	**--**
	NYS ROUTE 141	WB L-T	C	31.6	0.29	B	16.3	0.21	C	34.7	0.46	B	17.0	0.28
		WB R	A	4.6	0.31	A	5.9	0.37	A	4.6	0.31	A	5.9	0.37
		WB OVERALL	**B**	**11.8**	**--**	**A**	**8.7**	**--**	**B**	**15.6**	**--**	**A**	**9.4**	**--**
	NYS ROUTE 141	SEB L-T-R	D	39.4	0.96	C	21.9	0.82	D	39.4	0.96	C	21.9	0.82
		SEB OVERALL	**D**	**39.4**	**--**	**C**	**21.9**	**--**	**D**	**39.4**	**--**	**C**	**21.9**	**--**
	MEMORIAL DRIVE	NWB L-T-R	D	46.2	0.74	C	30.9	0.62	D	46.2	0.74	C	30.9	0.62
		NWB OVERALL	**D**	**46.2**	**--**	**C**	**30.9**	**--**	**D**	**46.2**	**--**	**C**	**30.9**	**--**
	OVERALL INTERSECTION		**C**	**28.9**	**--**	**B**	**14.2**	**--**	**C**	**28.9**	**--**	**B**	**13.5**	**--**
18	NYS ROUTE 141 (BROADWAY) & SPRAIN BROOK PARKWAY SB ON RAMP													
	UNSIGNALIZED													
	NYS ROUTE 141	WB L-T	B	11.8	0.21	A	9.9	0.19	B	12.0	0.21	B	10.4	0.21
19	NYS ROUTE 141 (BROADWAY) & WEST CROSS STREET													
	SIGNALIZED													
	NYS ROUTE 141	EB L-T-R	B	11.3	0.47	B	11.5	0.51	B	11.5	0.49	B	11.8	0.53
		EB OVERALL	**B**	**11.3**	**--**	**B**	**11.5**	**--**	**B**	**11.5**	**--**	**B**	**11.8**	**--**
	NYS ROUTE 141	WB L-T-R	B	11.5	0.52	B	11.4	0.52	B	11.7	0.53	B	11.7	0.54
		WB OVERALL	**B**	**11.5**	**--**	**B**	**11.4**	**--**	**B**	**11.7**	**--**	**B**	**11.7**	**--**
	W CROSS STREET	NB L-T-R	B	11.0	0.46	B	10.7	0.43	B	12.1	0.53	B	10.9	0.44
		NB OVERALL	**B**	**11.0**	**--**	**B**	**10.7**	**--**	**B**	**12.1**	**--**	**B**	**10.9**	**--**
	BROADWAY	SB L-T-R	A	7.5	0.06	A	8.2	0.16	A	7.5	0.06	A	8.2	0.16
		SB OVERALL	**A**	**7.5**	**--**	**A**	**8.2**	**--**	**A**	**7.5**	**--**	**A**	**8.2**	**--**
	OVERALL INTERSECTION		**B**	**11.1**	**--**	**B**	**11.0**	**--**	**B**	**11.6**	**--**	**B**	**11.2**	**--**

TABLE NO. 4

PHASE 2

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION		YEAR 2039 NO-BUILD						YEAR 2039 BUILD - PHASE 2					
			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
			LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
20	NYS ROUTE 9A & PARKVIEW BOULEVARD/BELMONT ROAD													
	UNSIGNALIZED													
	NYS ROUTE 9A	NB L-T	B	13.2	0.00	A	0.0	0.00	C	15.0	0.00	A	0.0	0.00
	NYS ROUTE 9A	SB L-T	A	9.0	0.00	B	13.0	0.00	A	9.4	0.00	C	15.7	0.00
	PARKVIEW BOULEVARD	EB L-T-R	A	0.0	0.00	E	41.3	0.09	A	0.0	0.00	F	79.3	0.17
	BELMONT ROAD	WB L-T-R	C	22.0	0.26	C	18.1	0.19	D	31.3	0.35	C	24.4	0.26
21	NYS ROUTE 9A & SKYLINE DRIVE (NORTH LEG)													
	SIGNALIZED													
	NYS ROUTE 9A	EB T	A	4.2	0.36	A	8.7	0.53	A	5.7	0.52	A	9.6	0.58
		EB T-R	A	4.2	0.36	A	8.7	0.53	A	5.7	0.52	A	9.6	0.59
		EB OVERALL	**A**	**4.2**	--	**A**	**8.7**	--	**A**	**5.7**	--	**A**	**9.6**	--
	NYS ROUTE 9A	WB L	A	3.1	0.45	A	6.0	0.14	A	6.4	0.67	A	7.0	0.23
		WB T	A	8.6	0.82	A	5.2	0.46	A	1.1	0.91	A	2.2	0.76
		WB OVERALL	**A**	**7.6**	--	**A**	**5.3**	--	**A**	**2.0**	--	**A**	**2.5**	--
	SKYLINE DRIVE	NB L	E	60.6	0.48	E	67.6	0.80	E	57.9	0.40	E	67.6	0.80
		NB R	E	63.7	0.59	F	202.6	1.27	E	63.9	0.66	F	237.9	1.35
		NB OVERALL	**E**	**62.2**	--	**F**	**147.0**	--	**E**	**61.5**	--	**F**	**170.5**	--
	OVERALL INTERSECTION		**A**	**8.4**	--	**C**	**35.0**	--	**A**	**5.5**	--	**C**	**33.8**	--
22	NYS ROUTE 9A & SAW MILL RIVER PKWY. NB ON/OFF RAMPS 1824 DRIVEWAY													
	SIGNALIZED													
	SMRP NB ON/OFF RAMPS	SEB L	D	53.9	0.77	D	53.4	0.84	F	92.2	1.04	E	55.5	0.86
		SEB L-T-R	E	70.6	0.90	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		SEB OVERALL	**E**	**62.9**	--	**D**	**53.4**	--	**F**	**92.2**	--	**E**	**55.5**	--
	1824 DRIVEWAY	NWB L	E	57.0	0.33	E	57.0	0.36	E	57.0	0.33	E	57.0	0.36
		NWB L-T	E	57.3	0.38	E	57.4	0.43	E	57.3	0.38	E	57.4	0.43
		NWB R	D	52.1	0.16	D	52.3	0.23	D	52.1	0.16	D	52.3	0.23
		NWB OVERALL	**E**	**55.8**	--	**E**	**55.7**	--	**E**	**55.8**	--	**E**	**55.7**	--
	NYS ROUTE 9A	NEB L	B	13.4	0.31	B	10.3	0.60	B	16.9	0.38	C	30.4	0.85
		NEB T	B	14.8	0.35	B	13.0	0.46	B	17.8	0.43	B	14.8	0.51
		NEB T-R	B	14.8	0.35	B	12.9	0.46	B	17.7	0.43	B	14.7	0.51
		NEB OVERALL	**B**	**14.6**	--	**B**	**12.3**	--	**B**	**17.6**	--	**B**	**18.3**	--
	NYS ROUTE 9A	SWB L	B	10.3	0.12	A	9.9	0.16	B	12.1	0.14	B	11.2	0.18
		SWB T	B	17.8	0.59	B	14.8	0.41	C	20.6	0.69	B	19.6	0.64
		SWB T-R	B	17.7	0.59	B	14.8	0.41	C	20.6	0.69	B	19.6	0.64
		SWB OVERALL	**B**	**17.3**	--	**B**	**14.5**	--	**C**	**20.2**	--	**B**	**19.1**	--
	OVERALL INTERSECTION		**C**	**27.3**	--	**C**	**20.1**	--	**D**	**38.5**	--	**C**	**24.6**	--
23	NYS ROUTE 9A & SKYLINE DRIVE (SOUTH LEG)													
	UNSIGNALIZED													
	NYS ROUTE 9A	SB L-T	A	9.2	0.09	B	13.2	0.02	A	9.6	0.10	B	13.9	0.02
	SKYLINE DRIVE	WB L	E	37.1	0.33	F	447.3	1.79	F	52.9	0.43	F	893.4	2.73
	SKYLINE DRIVE	WB R	B	10.1	0.02	B	14.6	0.16	B	10.4	0.02	C	15.3	0.16
24	NYS ROUTE 9A & DANA ROAD / HOME DEPOT DRIVEWAY													
	SIGNALIZED													
	HOME DEPOT DRWY	EB L-T	F	209.0	1.23	F	534.9	2.01	F	237.9	1.30	F	609.1	2.17
		EB R	B	17.5	0.23	B	17.3	0.25	B	19.7	0.24	C	20.6	0.27
		EB OVERALL	**F**	**104.7**	--	**F**	**287.4**	--	**F**	**119.1**	--	**F**	**327.6**	--
	DANA ROAD	WB L-T	F	99.0	0.89	F	1195.0	3.48	F	118.5	0.94	F	1321.3	3.75
		WB R	B	15.6	0.14	B	18.1	0.27	B	17.7	0.15	C	21.5	0.29
		WB OVERALL	**D**	**51.1**	--	**F**	**693.6**	--	**E**	**60.6**	--	**F**	**767.5**	--
	NYS ROUTE 9A	NB L	B	16.2	0.47	B	14.4	0.47	B	16.5	0.50	B	18.6	0.64
		NB T	C	26.7	0.74	C	23.8	0.71	C	26.9	0.76	C	22.8	0.70
		T-R	C	26.7	0.74	C	23.7	0.71	C	26.9	0.76	C	22.7	0.70
		NB OVERALL	**C**	**25.2**	--	**C**	**22.3**	--	**C**	**25.6**	--	**C**	**22.1**	--
	NYS ROUTE 9A	SB L	B	18.0	0.64	B	17.0	0.52	B	19.1	0.67	B	16.9	0.53
		SB T / T	C	21.3	0.64	C	20.1	0.51	C	21.4	0.67	C	22.8	0.72
		SB R	B	16.0	0.15	B	16.2	0.11	B	15.2	0.14	B	15.0	0.10
		SB OVERALL	**C**	**20.3**	--	**B**	**19.3**	--	**C**	**20.5**	--	**C**	**21.7**	--
	OVERALL INTERSECTION		**C**	**31.7**	--	**F**	**151.4**	--	**C**	**33.1**	--	**F**	**147.2**	--
25	HOSPITAL ROAD & SUNSHINE COTTAGE ROAD													
	UNSIGNALIZED													
	SUNSHINE COTTAGE RD.	EB L-T	A	7.5	0.07	A	8.2	0.15	A	7.5	0.08	A	8.2	0.17
	HOSPITAL ROAD	SB L	B	12.3	0.19	C	16.5	0.10	B	12.7	0.20	C	17.7	0.11
		SB R	A	9.1	0.16	B	10.0	0.17	A	9.2	0.17	B	10.2	0.19
26	DANA ROAD & HAMMOND HOUSE ROAD													
	UNSIGNALIZED													
	DANA ROAD	EB L-T	B	11.1	0.43	A	8.7	0.10	B	11.5	0.46	A	9.0	0.13
	DANA ROAD	WB T-R	A	7.8	0.02	A	8.9	0.21	A	7.9	0.02	A	9.0	0.21
	HAMMOND HOUSE ROAD	SB L-R	A	8.9	0.23	A	9.6	0.41	A	9.0	0.25	B	10.1	0.44
27	DANA ROAD & WALKER ROAD													
	UNSIGNALIZED													
	DANA ROAD	WB L-T	A	8.2	0.02	A	8.0	0.08	A	8.2	0.03	A	8.1	0.09
	WALKER ROAD	NB L-R	B	14.2	0.40	C	19.3	0.38	B	14.9	0.43	C	20.7	0.44

TABLE NO. 4

PHASE 2

LEVEL OF SERVICE SUMMARY TABLE

	LOCATION		YEAR 2039 NO-BUILD						YEAR 2039 BUILD - PHASE 2					
			WEEKDAY AM			WEEKDAY PM			WEEKDAY AM			WEEKDAY PM		
			LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
28	NYS ROUTE 100 (BRADHURST AVENUE) & LAKEVIEW AVENUE													
	UNSIGNALIZED													
	NYS ROUTE 100	SB L-T	A	8.0	0.03	A	8.3	0.02	A	8.3	0.03	A	8.4	0.04
	LAKEVIEW AVENUE	SWB L-R	D	27.4	0.49	C	23.6	0.51	E	41.2	0.65	E	43.4	0.72
29	NYS ROUTE 100 (BRADHURST AVENUE) NYS ROUTE 100A (KNOLLWOOD ROAD) NYS ROUTE 100C (GRASSLANDS ROAD)													
	SIGNALIZED *													
	NYS ROUTE 100C	EB L	C	26.3	0.74	B	19.2	0.43	C	30.2	0.79	B	19.6	0.45
		EB T	F	67.0	1.02	D	53.1	0.96	F	67.0	1.02	D	53.1	0.96
		EB R	C	20.0	0.58	B	15.5	0.35	C	20.0	0.58	B	15.5	0.35
		EB OVERALL	**D**	**46.8**	**--**	**D**	**39.8**	**--**	**D**	**47.5**	**--**	**D**	**39.9**	**--**
	NYS ROUTE 100	WB L	C	25.6	0.23	C	24.3	0.31	C	25.6	0.23	C	24.3	0.31
		WB T-R	D	38.5	0.79	C	29.9	0.69	D	42.8	0.85	C	31.0	0.72
		WB OVERALL	**D**	**37.7**	**--**	**C**	**29.4**	**--**	**D**	**41.8**	**--**	**C**	**30.4**	**--**
	NYS ROUTE 100A	NB L*	E	75.5	0.94	E	58.7	0.88	E	75.5	0.94	E	59.4	0.88
		NB T-R*	D	46.1	0.72	C	34.3	0.49	E	55.1	0.82	D	37.8	0.58
		NB OVERALL	**E**	**60.7**	**--**	**D**	**46.7**	**--**	**E**	**64.5**	**--**	**D**	**48.3**	**--**
	NYS ROUTE 100	SB L	C	34.0	0.63	C	31.7	0.24	D	42.1	0.75	C	31.1	0.37
		SB T-R	F	161.7	1.20	F	154.1	1.19	F	182.9	1.25	F	199.0	1.30
		SB OVERALL	**F**	**115.7**	**--**	**F**	**133.7**	**--**	**F**	**130.9**	**--**	**F**	**162.6**	**--**
	OVERALL INTERSECTION		**E**	**59.9**	**--**	**D**	**54.8**	**--**	**E**	**65.0**	**--**	**E**	**63.1**	**--**
30	NYS ROUTE 100C (GRASSLANDS ROAD) & SPRAIN BROOK PKWY NB ON/OFF RAMPS													
	SIGNALIZED *													
	NYS ROUTE 100C	EB L	B	16.8	0.12	B	11.0	0.33	B	16.8	0.12	B	11.0	0.33
		EB T / T	B	18.3	0.49	A	9.7	0.35	B	18.3	0.49	A	9.7	0.35
		EB OVERALL	**B**	**18.3**	**--**	**A**	**9.9**	**--**	**B**	**18.3**	**--**	**A**	**9.9**	**--**
	NYS ROUTE 100C	WB T / T	C	21.6	0.46	B	15.3	0.39	C	21.4	0.46	B	15.3	0.39
		WB R	B	18.5	0.15	B	13.5	0.18	B	18.5	0.15	B	13.5	0.18
		WB OVERALL	**C**	**21.2**	**--**	**B**	**15.0**	**--**	**C**	**21.1**	**--**	**B**	**15.0**	**--**
	SBP NB OFF RAMP	NB L-T	F	298.0	1.58	C	34.3	0.64	F	298.0	1.58	C	34.3	0.64
		NB R*	D	36.3	0.82	D	41.3	0.82	D	36.3	0.82	D	41.3	0.82
		NB OVERALL	**F**	**218.7**	**--**	**D**	**38.0**	**--**	**F**	**218.7**	**--**	**D**	**38.0**	**--**
	OVERALL INTERSECTION		**F**	**119.1**	**--**	**B**	**19.3**	**--**	**F**	**119.1**	**--**	**B**	**19.3**	**--**
31	NYS ROUTE 100C (GRASSLANDS ROAD) & SPRAIN BROOK PKWY SB ON/OFF RAMPS													
	SIGNALIZED													
	SBP SB ON/OFF RAMPS	SB L	D	41.9	0.81	D	45.1	0.83	D	41.9	0.81	D	45.1	0.83
		SB R	D	43.1	0.85	D	40.3	0.41	D	43.1	0.85	D	40.3	0.41
		SB OVERALL	**D**	**42.5**	**--**	**D**	**43.6**	**--**	**D**	**42.5**	**--**	**D**	**43.6**	**--**
	NYS ROUTE 100C	SEB T / T	A	7.4	0.55	F	144.3	1.29	A	7.4	0.55	F	144.3	1.29
		SEB OVERALL	**A**	**7.4**	**--**	**F**	**144.3**	**--**	**A**	**7.4**	**--**	**F**	**144.3**	**--**
	NYS ROUTE 100C	NWB T / T	A	7.7	0.59	A	4.0	0.28	A	7.7	0.59	A	4.0	0.28
		NWB R (FREE)	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		NWB OVERALL	**A**	**7.7**	**--**	**A**	**4.0**	**--**	**A**	**7.7**	**--**	**A**	**4.0**	**--**
	OVERALL INTERSECTION		**B**	**12.7**	**--**	**F**	**112.5**	**--**	**B**	**12.7**	**--**	**F**	**112.5**	**--**
32	NYS ROUTE 100C (GRASSLANDS ROAD) & WOODS ROAD/TAYLOR ROAD													
	SIGNALIZED													
	NYS ROUTE 100C	EB L	B	15.8	0.53	B	12.9	0.12	B	17.6	0.59	B	13.3	0.19
		EB T	A	2.8	0.29	C	27.3	0.87	A	2.8	0.29	C	27.4	0.87
		T-R	A	0.0	0.00	C	26.9	0.87	A	0.0	0.00	C	27.0	0.87
		EB OVERALL	**A**	**4.6**	**--**	**C**	**26.9**	**--**	**A**	**5.1**	**--**	**C**	**26.8**	**--**
	NYS ROUTE 100C	WB L	A	4.3	0.01	D	37.6	0.06	A	4.4	0.01	D	37.7	0.06
		WB T	B	11.5	0.73	B	19.0	0.53	B	11.7	0.73	B	19.8	0.54
		WB T-R	B	12.1	0.75	B	19.0	0.53	B	12.3	0.75	B	19.8	0.54
		WB OVERALL	**B**	**11.8**	**--**	**B**	**19.1**	**--**	**B**	**12.0**	**--**	**B**	**19.9**	**--**
	TAYLOR ROAD	NB L-T-R	D	42.0	0.04	C	27.2	0.03	D	42.0	0.04	C	27.2	0.03
		NB OVERALL	**D**	**42.0**	**--**	**C**	**27.2**	**--**	**D**	**42.0**	**--**	**C**	**27.2**	**--**
	WOODS ROAD	SB L-T	D	45.3	0.50	D	36.2	0.71	D	45.2	0.49	D	36.2	0.71
		SB R	D	39.7	0.22	C	24.0	0.16	D	39.8	0.27	C	23.5	0.19
		SB OVERALL	**D**	**43.6**	**--**	**C**	**32.8**	**--**	**D**	**43.3**	**--**	**C**	**32.2**	**--**
	OVERALL INTERSECTION		**B**	**11.3**	**--**	**C**	**25.3**	**--**	**B**	**11.7**	**--**	**C**	**25.4**	**--**
33	NYS ROUTE 100C (GRASSLANDS ROAD) & WALKER ROAD/CLEARBROOK ROAD													
	SIGNALIZED													
	NYS ROUTE 100C	EB L	C	25.0	0.12	C	33.3	0.06	C	25.0	0.15	C	33.6	0.14
		EB T-R	F	73.7	1.05	F	275.5	1.54	F	80.2	1.07	F	287.6	1.57
		EB OVERALL	**E**	**69.9**	**--**	**F**	**271.7**	**--**	**E**	**75.1**	**--**	**F**	**279.2**	**--**
	NYS ROUTE 100C	WB L	C	27.1	0.53	D	35.4	0.55	C	27.1	0.53	D	35.4	0.55
		WB T-R	F	460.8	1.96	D	54.0	0.98	F	467.7	1.97	F	60.7	1.01
		WB OVERALL	**F**	**392.7**	**--**	**D**	**50.7**	**--**	**F**	**399.0**	**--**	**E**	**56.3**	**--**
	CLEARBROOK ROAD	NB L-T	D	35.2	0.31	D	36.1	0.53	D	35.2	0.31	D	36.1	0.53
		NB R	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		NB OVERALL	**D**	**35.2**	**--**	**D**	**36.1**	**--**	**D**	**35.2**	**--**	**D**	**36.1**	**--**
	WALKER ROAD	SB L-T	C	34.7	0.58	C	29.1	0.62	C	34.7	0.58	C	29.1	0.62
		R	C	29.9	0.06	C	21.9	0.05	C	29.9	0.06	C	21.9	0.05
		SB OVERALL	**C**	**34.3**	**--**	**C**	**28.6**	**--**	C	34.3	--	C	**28.6**	**--**
	OVERALL INTERSECTION		**F**	**271.2**	**--**	**F**	**148.6**	**--**	**F**	**275.2**	**--**	**F**	**155.2**	**--**

NOTES:

1) THE ABOVE REPRESENTS THE LEVELS OF SERVICE AND VEHICLE DELAY IN SECONDS, B [13.2] FOR EACH MOVEMENT, FOR EACH APPROACH AS WELL AS FOR THE OVERALL INTERSECTION FOR THE SIGNALIZED INTERSECTIONS AND THE LEVELS OF SERVICE AND AVERAGE TOTAL DELAY IN SECONDS, B[10.9] FOR THE UNSIGNALIZED INTERSECTIONS.

* INTERSECTION 30 - NORTHBOUND RIGHT TURN VOLUME IS LESS THAN THE DEMAND DUE TO THE OPERATION OF THE NYS ROUTE 100C / NYS ROUTE 100A / NYS ROUTE 100 INTERSECTION (INTERSECTION 29)

CLEARY CONSULTING

MEMORANDUM

To: Chairman McLaughlin & Members of the Planning Board
From: Patrick Cleary, AICP, CEP, PP, LEED AP
Date: October 31, 2020
Re: North 60 - DEIS Substantive Review

The following comments are offered regarding the Draft Environmental Impact Statement prepared for The North 60, prepared by VHB, accepted by the Lead Agency as complete on July 2, 2020:

#	PAGE #	COMMENT
2 – Project Description		
1	2-2	**1st partial ¶ -** What process or procedure is proposed to empower the Town Board to grant approval of the Master Development Plan?
2	2-6	**1st bullet –** How does the lease address changes of uses, or the introduction of unanticipated new uses that are not currently identified in the lease, that may be proposed in the future
3	2-6	**1st and 2nd bullet –** The potential development of an assisted living facility(s) had not been previously disclosed to the Town in the project presentations. What is the likelihood of such a use, and where would such a use be located? Such a use does not have an obvious nexus with a bio-science and technology center.
4	2-6	**3rd bullet–** Clarify that the sublease taxes will apply to all taxing jurisdictions.
5	2-6	**5th bullet** – Would major changes to the Master Development Plan, or subsequent site plan phases still only require approval of the Commissioner of Public Works and Transportation, without approval or ratification from the County Board of Legislators?
6	2-6	**8th bullet** – This provision speaks to the maintenance of the site. Would the project fall under the jurisdiction of the Town of Mount Pleasant's property maintenance law, or would the County supersede the Town's authority in this regard?

#	PAGE #	COMMENT
7	2-7	**1st ¶, 1st sentence –** The DEIS indicates that the "Project Site has never been developed." How was the site used prior to its acquisition by the County in 1915?
8	2-8	**Current Uses of Adjoining Properties –** Provide a map graphically depicting the specific location of the adjoining uses described in the narrative, so that a better understanding the project's impact on those properties can be ascertained.
9	2-9	**Table 2-2 –** Identify if the uses on the 20-acre parcel are presently occupied, or vacant.
10	2-10	**1st partial ¶ -** Assisted living facilities are not identified in the summary of uses proposed to be permitted in the new OB-5MP zoning. Is this use proposed? Refer to comment 3.
11	2-16	**Phase 1 –** provide the square footages of each use in each proposed building.
12	2-25	**Concept Plan –** Has the pandemic caused any reassessment of the concept plan such as the relocation, reorientation or modification buildings, open spaces, sidewalks and streetscapes, etc.? If permanent changes to building codes or other regulations affecting development are imposed by the state or other regulatory agencies, how would those changes be accommodated?
13	2-26	***Entry and Main Street,* 1st ¶ -** Provides examples of *"ground floor uses to encourage activity and a pedestrian streetscape."*
14	2-26	***Entry and Main Street,* 2nd ¶ -** While the renderings offer some idea of the types of improvements envisioned along Main Street, a more thorough narrative description of the types of improvements and amenities proposed, beyond "*a distributed series of spaces…*" is requested.
15	2-26	***Neighborhood Square* –** The narrative indicates that this amenity will be used by "*the employee"* and "*Town of Mount Pleasant Residents."* Will in fact the use of this space be restricted in any way to use by specific groups?
16	2-33	***Western Portion of the Site* –** The narrative references *"strong links to other portions of the site…"* Describe how pedestrian and bicycle circulation is being accommodated. Ideally, a robust pedestrian and bicycle circulation plan would be incorporated into then plan at the outset, rather than as an

#	PAGE #	COMMENT
		afterthought. Will separate bike lanes be provided? Are traditional concrete sidewalks proposed, or more innovative pedestrian ways? Clarification is requested.
17	2-33	***Architectural Site Design,*** **4th ¶** - What is meant by "*…designed with LEED components*." Is a level of LEED certification proposed, or is the development simply utilizing green building measures and techniques?
18	2-33	***Architectural Site Design,*** **4th ¶** - Explain how the project is *"…economically and socially sustainable…"* Provide examples.
19	2-34	**7th ¶** - The DEIS indicates that solar will be investigated as a potential energy source. Aside from the energy generation benefits associated with solar power, the type of solar installation can result in adverse impacts. Specifically, roof mounted solar panels are ideal, but ground mounted solar arrays that require the extensive removal of trees and vegetation and the destruction of habitats, may be less desirable. The applicant should identify how solar technologies might be utilized at this site.
20	2-34	**8th ¶** - Explain how the connection to the North County Trailway will be made.
21	Figure 2-16	Are the off-site Bike/Pedestrian Paths along Walker Road and Grasslands Road, that are depicted in this Figure, existing, or are they proposed to be constructed by the developer?
22	2-38	**Sustainability, Green Technologies and Energy Efficiency –** The DEIS indicates that the Master Development Plan will be *"capable of obtaining LEED Siler certification."* Is it the applicant's intent to pursue this certification from the US Green Building Council, or simply to demonstrate that by utilizing a LEED checklist, between 50 – 59 point *could* be achieved?
23	2-38	**Sustainability, Green Technologies and Energy Efficiency –** The DEIS very generally describes possible green building techniques, and uses language such as "*may include."* It will prove difficult to document the benefits of these measures in the Findings, unless these items can be more accurately described and documented.
24	2-38	**Tree Removal/Preservation, Landscape Design and Open Space –** Clarify if any restrictions or limitations are proposed for the open space areas. Will all open space areas be open to the general public,

#	PAGE #	COMMENT
		and not exclusively for the tenants of the development? Perhaps Figure 2-17 can be used to illustrate this.
25	2-41	**Site Safety & Security –** Describe the proposed "*Site Security*."
26	2-45-49	It would be helpful to provide a map, similar to Figure 2-17, which pinpoints the location of the various open space features.
27	2-49	**Streets –** The DEIS notes that *"streets will be designed to create a pedestrian friendly environment…*" Streets are inherently unfriendly to pedestrians and cyclists, so the specific techniques proposed to create this pedestrian friendly environment should be documented. Because all of this development is being newly developed, including the street system, the ability to create "complete streets" is apparent.
28	2-50	**2.4 Overview of the North 60 Lease, 4th ¶ -** The timing of the results of the Weitzman Group's Market and Financial Feasibility Study – and in particular the mix of uses represents a concern. Obviously, changes to the mix of uses presented in the DEIS would change the impacts associated with the proposed development. The potential mix of uses must be finalized during the course of the review of the EIS.
29	2-51	**2.5 Project Purpose, Public Need and Benefits, 2nd ¶, 1st bullet –** Identify the portion of the estimated $9.3 million in annual real estate taxes that would be attributable to the Town of Mount Pleasant.
30	2-51	**2.5 Project Purpose, Public Need and Benefits, 3rd ¶, 8th bullet –** A cycletrack is referenced in this bullet. This is the first reference of this amenity. Clarification is required.
3A – Land Use, Zoning & Public Policy		
31	3A-2	Document the distances to the various land uses (specific buildings) identified to the North, East, South and West of the project site.
32	3A-8	The Town's Comprehensive Plan Update, known as Envision Mount Pleasant is no longer in the public engagement phase. The draft Plan will be publicly released in November.
33	3A-15	**a) Land Use 2nd ¶, 1st sentence –** Document how the proposed 80,000 square feet of new retail space will not detract from or directly compete with the existing retail uses in Hawthorne and Valhalla. It is imperative that the success and vitality of those hamlets not be adversely impacted by what amounts to the

#	PAGE #	COMMENT
		construction of a new 4th hamlet center within the Town.
34	3A-15	**a) Land Use 4th ¶, 2nd sentence –** A primary land use concern related to the North 60 development is the potential for the creation of an isolated enclave that is not integrated into the Town of Mount Pleasant as a whole. The DEIS indicated that *"The Project Site has not been designed to function as an isolated campus but rather as a walkable "main-street" style complex that is open and integrated with the surrounding community."* It remains unclear how this is being done. This issue requires further clarification.
35	3A-16	**2nd full ¶ -** Are the bio-science and technology uses proposed at the site envisioned to be more associated with the Medical Center, and New York Medical College uses to the south, or more akin to the Regeneron campus to the west?
36	3A-16	**3rd full ¶ -** It is unclear how the DEIS draws the conclusion that the hamlets of Valhalla, Hawthorne and Thornwood would not experience land use impacts, because "*…the proposed uses on the project Site are intended to compliment those uses that are immediately adjacent to the Project Site…"* The reasoning behind this conclusion must be more fully explained.
37	3A-16	**b) Zoning, last ¶ -** This citation of the proposed OB5 MP zoning indicates that the integrated master plan would be approved by the Planning Board. However, as noted in comment #1, the Town Board was identified as the approving agency. Clarification is required.
38	3A-16	**b.) Zoning, last ¶ -** All of the uses that would be permitted at this site under the proposed OB-5 MP zoning district should be identified and evaluated. Certain uses may be found to be inappropriate at this location, including for example, assisted living facilities, self-storage facilities, vape shops, etc.
39	3A-16	**b.) Zoning –** How will discrepancies between uses allowable under the lease and uses allowable under the OB-5 MP zone be addressed? The potential for conflicts exists because the OB-5 zone incorporates the permitted uses from other districts. Thus, the addition of new or unanticipated uses in those affiliated zones may ripple into the OB-5 MP zone.
40	3A-19	**Patterns for Westchester –** Clarify how the project compiles with the density provisions established in Patterns.

#	PAGE #	COMMENT
41	3A-20	**New York State Hazard Mitigation Plan –** The DEIS only addresses the flood hazard. Other hazards, such as the destructive tornado experienced a number of years ago, terrorism, or more routine hazards such as fire, should be addressed in the context of the unique uses on the site that might involve hazardous materials, chemicals, bio-substances, experimental drugs, all of which may create unique challenges during the course of an event.
3B – Visual Resources and Community Character		
42	3B-1	**Visual Character of the Project Site –** The description of the site on Page 3A-1 notes the presence on an asphalt parking lot, which is not identified in this description. Clarification is required.
43	3B-1	**Visual Character of Surrounding Properties – *Residential Properties* –** describe the approximate lot sizes and square footages of the homes near the site.
44	3B-1	**Visual Character of Surrounding Properties – *Campus* –** describe the approximate square footages of the buildings on the campus, to provide a frame of reference for the proposed 3 million square feet within the proposed development.
45	3B-1	**Visual Character of Surrounding Properties – *Campus* –** Characterize the primary architectural styles of the various building on the campus.
46	3B-2	**Visual Character of Surrounding Properties – *Nearby Office Parks and Saw Mill Rive Road* –** Describe the height, approximate square footages, architectural styles, and site attributes of the adjacent office parks of commercial uses.
47	Figure 3B-6	**Visual Simulations –** The buildings depicted in the visual simulations are shown in a white color, which certainly minimizes their visual impact. A more realistic documentation of the color palate and proposed materials intended to be used for the buildings should be provided to gain a more accurate understanding of visual impacts.
48	Figure 3B-6	**Visual Simulations –** Do the buildings in the rendered visual simulations identify roof mounted appurtenances, like mechanical and HVAC equipment, laboratory venting stacks, solar panels, etc.?
49	Figure 3B-6	**Visual Simulations –** Is large (illuminated) branding signage anticipated on the tops of these buildings, similar to the Regeneron buildings at Eastview? If so, it should be included on the renderings.

#	PAGE #	COMMENT
50	3B-54	**Site Lighting –** Clarify interior building lighting. Will interior lighting cast its illuminating effects beyond property lines, or create visually disruptive illumination levels? Is it anticipated that these buildings will operate into the evening hours? If so, has consideration been given to utilizing blinds, curtains, shades of window tints to minimize light glare.
3C – Geology & Soils		
51	3C-6-7	**Potential Impacts –** The DEIS indicates that 18,464 cubic yards of excess material will need to be removed from the site during Phase1 and a total of 473,059 cubic yards during the entire development. The timing and manner of the removal of this material must be addressed. The Board's experience with the very large of excess fill material left over from the excavation of the DEP UV facility just south of the project site – which still remains on their site, is a vivid reminder of how excess material can be exceedingly problematic. How many truck trips will be required to remove this material and how long will it take? Is there any scenario where excess material would be stored on the site for extended periods of time? This would certainly be recognized as an adverse impact.
52	3C-13	**Contaminated Soil** – Based upon the findings of the Phase I and II Environmental Site Assessments, a better understanding of whether NYSDEC approval is necessary, should be provided.
3D – Topography & Slopes		
53	3D-3	**Historic Modifications to the Project Site's Topography** – Is there any estimate of when the dumping activities occurred at the site? Is it recent or did it occur some time ago?
54	3D-3	**Potential Impacts, 2nd ¶ -** The DEIS states that steep slope impacts were minimized to the "*greatest extent practicable*." Document how this was accomplished, and clarify if additional site design modifications could further reduce impacts on steep slopes.
55	3D-6	**Retaining Walls –** Identify the proposed heights of the retaining walls. Will all walls comply with the applicable height requirements?
3E – Vegetation & Wildlife		
56	3E-10	**Potential Impacts, Vegetative Cover, 2nd ¶-** Explain the use of the term "*renaturalized."* Renaturalized, in comparison to *revegetated* or *replanted*, implies that

#	PAGE #	COMMENT
		all of the previous natural and ecological functions of the area are being fully restored. A task that is difficult to achieve if soils and subsoils are disturbed. Is this the intended meaning?
57	3E-11	**1st full ¶ -** Clarify specific type of disturbance proposed to the stream and associated wetlands. Importantly, identify when these disturbances would occur and their duration. Would these disturbances occur during breeding periods or other times when resident species are highly vulnerable? Will the disturbances occur over multiple seasons which may prevent re-habitation?
58	3E-11	**2nd full ¶ -** It is noted that new culverts are proposed to be installed to accommodate stream crossings. The type of culvert proposed should be identified, Open bottom culverts may be advisable to maintain to integrity of the benthic layer of the stream.
59	3E-20	**Vegetation to Remain –** Within the areas of the site that will remain undisturbed, will any effort be made to remove invasive species?
60	3E-21	**1st partial ¶ -** More fully explain the sentence "*Populations of certain species may increase due to greater proportion of urban structure."* Is this a reference to nuisance species?
61	3E-21	**1st full ¶ -** Support the claim that adverse impacts to avian species are not expected to be significant. In particular, bird window collisions are a significant concern, and the project renderings reflect large amounts of glass. The Audubon Society provides excellent guidance to assess these impacts.
62	3E-21	**Habitat and Wildlife Corridor Fragmentation –** The DEIS did not specifically address how the loss of the last vestige of undeveloped land in the area would not result in serious habitat fragmentation.
63	3E-21	**Habitat and Wildlife Corridor Fragmentation –** The DEIS notes that birds and insects will continue to travel through the site as they do today. This does not appear to be the case with mammals, which may represent an adverse impact.
64	3E-21	**Habitat and Wildlife Corridor Fragmentation –** With regard to on-site flora and fauna, the DEIS notes that "… *the quantity of each species would diminish."* This must be recognized as an unavoidable adverse impact.
65	3E-23	**Preservation of Trees, 3rd ¶ -** The DEIS notes that final landscaping plans will be provided as part of the Building Permit process. Final Landscaping Plans are

#	PAGE #	COMMENT
		required as part of the Site Plan approval process, and for Phase 1, must be submitted at this time.
66	3E-25	**Preservation of Existing Conditions –** Further documentation is required before it can be concluded that existing conditions, wetlands and wildlife corridors have been protected to the greatest extent practical.
67	3E-25	**Fertilizer, Herbicide, Fungicide and Pesticide Application –** Would the developer agree to a condition requiring the use of low nitrogen fertilizers.
3F – Wetlands, Waterbodies & Watercourses		
68	3F-1	**Existing Conditions, 3rd ¶, last sentence –** Have the wetland boundaries been field verified by the Town's wetland consultant, the NYSDEC or USACOE? If not, this verification is necessary prior to any decisions regarding the proposed action, and its interface with the regulated wetland and wetland buffer areas.
69	3F-10	**Potential Impacts –** The primary method to minimize and mitigate wetland impacts is through avoidance. For each wetland impact identified, document why an alternative could not be implemented that would avoid (or substantially minimize) the wetland impact.
70	3F-19	**Potential Impacts –** Stream culverting is proposed in several locations. Are more natural techniques available that would avoid the installation of structures such as concrete culverts?
71	3F-11	**1st full ¶ -** It is noted that the proposed wetlands lost to wetlands created ratio is 1:1. While a restoration ratio is not prescribed by Code, the 1:1 ratio reflects a minimal commitment to wetland restoration. For a development where a significant portion of the site would remain in a natural, open space condition, it would be expected that the ratio would be higher.
3H – Utilities		
72	3H-1	**Water Supply –** Who utilizes the water from Westchester County Water District #3? Is this water provided to County uses only?
73	3H-1	**Sanitary Sewer –** The reference to the WCDEF indicating that the Yonkers treatment plant has "*…additional capacity within their system for future projects of the nature of the Proposed Action"* must be verified.
74	3H-8	**Other Utilities –** Clarify if solar energy is anticipated as a component of the development.
75	3H-9	**Mitigation Measures – Water Supply –** The DEIS notes that the Kensico Water District cannot provide adequate fire flows for the project. Mitigation

#	PAGE #	COMMENT
		measures include Water District upgrades, expansion of Westchester County Water District #3 and an on-site storage tank. The applicant should document their commitment to assisting in the provision of these necessary mitigation measures.
76	3H-10	**Mitigation Measures – Sanitary Sewer –** The DEIS indicates that in accordance with County requirements, a 3:1 I&I mitigation program will be necessary. The applicant has indicated that they will coordinate with WCDEF. It is recommended that the Town Engineer also be included in determining what I&I improvements would be made, to ensure that priority is given to improvements in the Town of Mount Pleasant.
3I – Traffic and Transportation		
77	3I-13	**Neighborhood (Cut Through) Traffic** – The DEIS indicates that the new roadway to Route 9A will offer a "*preferred*" alternative to neighborhood cut through traffic. Explain why this new route would be preferred.
78	3I-3	**Neighborhood (Cut Through) Traffic** – Would the new roadway provide yet another connection that would allow the diversion of project generated traffic through the existing adjacent neighborhood street network?
79	3I-16	**Public Transportation – Transportation Shuttle -** The DEIS indicates that the shuttle will initially access the Hawthorne Train Station. Figure 2-16 depicts the shuttle accessing both the Hawthorne and Valhalla train stations. Clarification is required.
80	3I-18	**Summary of Roadway Improvements –** The DEIS commits the applicant to funding the required roadway improvements. Will the applicant also construct the improvements, or will other agencies be directly responsible for the actual constriction?
81	3I-21	**Pedestrian/Bicycle/Ridesharing Accommodations –** Specific design details of the proposed pedestrian and bicycle infrastructure are requested. Are conventional or protected bike lanes proposed. Will "sharrows" be utilized? Are "bike boxes" proposed at intersections? How will bicycle parking be accommodated? How will pedestrian movements be accommodated? What pedestrian intersection improvements are proposed? The Mobility and Connectivity Chapter of the draft Comprehensive Plan (Envision Mount Pleasant) provide guidance in this regard.
82	3I-21	**Pedestrian/Bicycle/Ridesharing Accommodations –** Is a bike share system proposed? If so, would it be

#	PAGE #	COMMENT
		a docked, or dockless system? Such a system would need to built into the site plan for the development.
83	3I-21	**Pedestrian/Bicycle/Ridesharing Accommodations –** Are ridesharing improvements proposed (such as designated pick-up and drop off areas outside of traffic lanes)?
84	3I-21	**Parking –** How will the parking management plan be implemented? Will the Town be responsible for its implementation? How will modifications be addressed if and when uses, or operations change in the future?
85	3I-28	**Accident Data –** reliance on the NYSDOT to address safety issues along Route 9A is inadequate. This section of Route 9A is arguably dangerous, primarily due to the excessive speeds, and uncontrolled left turns. Fatalities have occurred. The NYS Police and the Mount Pleasant Police Departments must also be involved in addressing the safety and adequacy of the proposed improvements, including the new roadway intersection location.
86	3I-29	**Monitoring Program –** Explain why the "Trip Banks" are set below the combined trip totals.
87	3I-29	**Monitoring Program** – The DEIS recommends that the monitoring program be trigged each time a new site plan application is filed. Should an additional trigger be utilized when building tenants change, perhaps linked to a defined threshold?
88	3I-32	**Bicycle Lane Along Bradhurst Avenue-** The DEIS indicates that "*…the existing right-of-way and topography limits the ability to construct an exclusive bike lane along Bradhurst Avenue."* The DEIS cites the public commentary collected for the Envision Mount Pleasant process, which emphasized as a priority, improving connectivity. Bike lanes are a key aspect of this. Rather than dismissing the possibility, the applicant should define what would be necessary to install a bike lane, including significant measures such a right-of-way widenings, etc.
89	3I-33	**Vehicle Connection to Mid Westchester Executive Park –** It is unclear what is meant by "*the previous landscape property."*
3J – Community Services		
90	3J-1	**Fire and Emergency Services** – The DEIS only references the Westchester EMS. Would the Valhalla Volunteer Ambulance Corps or the Hawthorne Volunteer Ambulance Corps have any jurisdiction or service responsibility at the project site?

#	PAGE #	COMMENT
91	Table 3J-1	Add a column that defines the jurisdiction that owns the park.
92	3J-8	**Police Services** – Input from the Mount Pleasant Police Department is necessary before any determination of police service impacts can be determined.
93	3J-8	**Police Services** – the "*site safety*" measures should be more fully described. "*Private security*" and "*outdoor lighting*" inadequately describes the measures proposed.
94	3J-8	**Police Services** – the DEIS indicates that tax revenues will cover the incremental costs to the MPPD, as well as the Westchester County Department of Public Safety. What role with the Westchester County Department of Public Safety have at the site?
95	3J-9	**Fire and Emergency Services –** Do the medical and bio-tech uses at the site pose any unique public safety of fire hazards? Presumably, these uses may regularly utilize hazardous materials, chemicals, bio-substances, experimental drugs, etc. Are special protocols necessary for firefighting, or the emergency releases of hazardous substances? When PepsiCo expanded their R&D facility on Columbus Avenue, special measures were taken to address their chemical storage and use. Presumably, the types of materials used at a bio-tech facility would be more hazardous than those of a soft drink company.
96	3J-9	**Fire and Emergency Services –** Input from the Hawthorne Fire Department is necessary before any determination of fire service impacts can be determined.
97	3J-9	**Fire and Emergency Services –** The applicant's opinion that there will be no significant adverse impact on fire services is invalid. As noted in comment #75, the Kensico Water District cannot provide adequate fire flows for the project. Mitigation measures are required that may include Water District upgrades, expansion of Westchester County Water District #3 and/or an on-site storage tank. No commitment has been made by the applicant to undertake these improvements. Until the scope and responsibility for completing these improvements is formally established, a significant adverse impact will result.

#	PAGE #	COMMENT
98	Table J-9	This table is incorrectly titled. Additionally, solid waste and recycling attributable to the publicly accessible open spaces should be accounted for.
99	3J-14	**Police Services** – As noted in comment #92, input from the Mount Pleasant Police Department is necessary before any determination of police service impacts can be determined.
100	3J-14	**Fire and Emergency Services –** As noted in comment #96 input from the Hawthorne Fire Department is necessary before any determination of fire service impacts can be determined.
3K – Fiscal Impacts		
101	3K-3	**Potential Impacts –** The impact of the proposed development on the existing hamlets and busines in the Town of Mount Pleasant should be documented.
102	3K-3	**Potential Impacts –** No reference has been made to the impact the COVID 19 pandemic has had on the overall marketing plan for the development. How has this influenced the project?
3M – Hazardous Materials		
103	3M-1	**Existing Conditions, 4) –** This paragraph references a two-family residence on the 60-acre County property, near Saw Mill River Road. This is the first reference to a residence on the County property. Clarification is required.
104	3M-1	**Existing Conditions, 7) –** This paragraph indicates that a 1,000-gallon underground fuel storage tank is present at the existing residence near Saw Mill River Road (referenced above in comment #103), but also notes that its condition could not be determined. How will the condition of this large UST be determined?
105	3M-2	**Existing Conditions, 10) –** Over what course of time were the 37 leaking tank incidents and 17 DEC spill incidents reported?
106	3M-4	**Potential Impacts, 1) –** The DEIS states that the condition of the 6 underground fuel oil tanks associated with the residences on the Developer Parcel were tightness tested in 2010, but their current condition "*cannot be determined.*" The Scope of the DEIS requires that the current condition of all on-site elements be documented. Data that is 10 years old should be updated.
107	3M-5	**Mitigation Measures, 2) –** The testing of the 6 underground fuel storage tanks is proposed "*Prior to the issuance of the certificate of occupancy for the phase 1 buildings.*" This work should occur prior to site plan approval, so that any remedial action that may affect the site plan can be properly incorporated.

#	PAGE #	COMMENT
3N - Noise		
108	3N-7	**Westchester Medical Center** – Indicate the distance to this sensitive receptor, as was done for all the other identified sensitive receptors.
109	Table 3N-3	The description of the ambient background noise conditions indicates that the *"…main source of artificial sound is street traffic…"* It is noted that noise measurements were collected during off-peak roadway volume periods. In order for the noise measurements to properly collect worst-case conditions, they should be recorded during the traffic peak hours.
110	3N-8	**Stationary Noise Impact Assessment** – The DEIS notes that 2 potential HVAC equipment pathways are under consideration, one involving a central plant building and the other utilizing packaged rooftop units. If the central plant option is utilized, that building would need to be reflected on the site plans currently under consideration.
111	3N-9	**Stationary Noise Impact Assessment, 2nd full ¶** – The DEIS indicates that information about emergency generators is not yet available. It should be noted that for this project an Emergency Electrical Generator Site Master Plan is required, in accordance with §218-20.2 of the Zoning Code.
112	3N-9	**Mobile Source Noise Impact Assessment –** This section acknowledges that roadway traffic is the primary source of mobile source noise generation, and goes on to address the existing roadways, such as Hospital Road, the Sprain Brook Parkway and Route 9A, but makes no reference to the new project roadway connector to Route 9A, which travels close to several sensitive noise receptors. This should be addressed.
113	3N-11	**Operational Mitigation –** This section should address emergency generator noise mitigation as well.
114	3N-12	**Construction Noise Mitigation/BMPs –** How would certain construction BMPs such as "*Locating especially noisy equipment as far from sensitive receptors as possible*" or "*Using quieter construction equipment…"* be implemented, enforced and monitored?
3O – Air Quality		
115	3O-7	**Potential Impacts –** Identify if any of the potential bio-tech and medical research uses that might operate at the site, would have the potential to discharge or vent potentially dangerous or hazardous

#	PAGE #	COMMENT
		substances. This is a somewhat sensitive issue in the Town which hosted the corporate headquarters of Union Carbide during the Bhopal disaster.
116	3O-8	**Vehicle Threshold Screening** – The DEIS references air quality thresholds at "*the 5 study area intersections.*" As depicted on Figure 3I-2, 33 intersections were included in the traffic study, not 5. Clarification is required.
117	3O-8	**Vehicle Threshold Screening** – The DEIS notes that the vehicle per hour threshold that would trigger a microscale analysis is 4,000 vph. And it is stated that this threshold is not exceeded at the 5 intersections. Provide the actual vph numbers, so an understanding of how close to the 4,000 vph threshold the project will be.
3P – Greenhouse Gas Emissions, Energy Conservation, Green Building & Sustainability		
118	3P-2	**Potential Impacts** – Clarify what is meant by "*capable of obtaining LEED Silver Certification."*
119	3P-2	**Potential Impacts** – Clarify the commitment to "*implement the following energy savings measures.*" How will the Town ensure that items listed are implemented?
120	3P-3	**Mitigation Measures –** Clarify the comment that "*the emissions will be less than a traditional single-family subdivision with a similar number of homes."* What is a similar number of homes? Similar to what?
3Q - Construction		
121	3Q-11	**Cut/Fill –** Identify the total number of truck trips required to remove the 18,464 cubic yards of excess material.
122	3Q-11	**Paving Operations –** Identify the amount of paving required, and the total number of truck trips required to import asphalt material.
123	3Q-11	**Superstructure Concrete** - Identify the amount of concrete required, and the total number of truck trips required to that material.
124	3Q-11	**Truck Routes –** Construction traffic impacts on local roads, such as Hospital Road (and the bridge over the Sprain Brook Parkway), Woods Road and Dana Road should be addressed.
125	3Q-12	**Blasting –** The DEIS notes that blasting is not anticipated. However, if found to be necessary, would it be employed? The applicant must agree to never employ blasting, or if it remains a possibility, a description of required blasting protocols and procedures must be identified.

#	PAGE #	COMMENT
126	3Q-12	**Mitigation Measures –** Are any unique mitigation measures required due to the site's proximity to the Medical Center. Is noise, air quality or vibration a concern? Are any specific conditions imposed in this regard in the County lease?
4 - Alternatives		
127	4-2	**Alternative B: Alternative Plan Under Existing Zoning**, **3rd ¶ -** The statement that this alternative would not generate "*…new economy career opportunities and substantial number of jobs…"* does not appear accurate. Figure 4-1 depicts 4 new buildings containing nearly 300,000 square feet of gross floor area. These buildings could certainly be devoted to bio-tech companies and "new economy career opportunities" similar to those in the Proposed Action. These would support a large number of new jobs. This alternative must be compared not only to the Proposed Action, but also to the existing conditon.
128	4-6	**Alternative C: Alternative Development Program**, **2nd ¶ -** A more complete definition of "low impact housing" is requested. What are the differences in impacts specifically?
129	4-13	**Land Use, Zoning & Public Policy, 3rd ¶ -** Further clarify the statement "*the applicant would engage in affirmative marketing to target households identified as least likely to apply due to their representation in the housing market."*
130	4-13	**Land Use, Zoning & Public Policy, 4th ¶ -** The DEIS notes that "*…renters would be graduate students, nursing students, first year medical residents, entry level employees for Westchester Medical Center and area biotech firms, either on the North 60 campus or in close proximity."* Will housing be limited to these groups? How would this be controlled? Would this housing be available to the general public?
131	Table 4-1	It is assumed that the numbers in this table reflect increases or decreases in trip generation compared to the Proposed Action. Provide total numbers and/or the numbers for the Proposed Action.
132	4-15	**Police, Fire and Emergency Services –** The DEIS indicates that there would be an increase in the demand on these services "*commensurate with an estimated 4.4% increase in the Town population.*" The specific number of staff, vehicles and facility square footage is required, utilizing standard projection formulas.
133	4-16	**Recreation and Open Space –** The impact on the Town's recreational resources resulting from an

#	PAGE #	COMMENT
		increased population of 1,209 residents, must be quantified, utilizing standard projection formulas.
134	4-14	**Utilities –** The specific water consumption and sewage generation rates must be identified.
135	4-16	**Schools –** The DEIS indicates that the proposed residential units would likely be located along the proposed Main Street, which is located in the Mount Pleasant Central School District. Is any restriction proposed to prevent residential units in the buildings that are located in the Pocantico Hills School District? If not, then the impacts on both school districts must be evaluated.
136	4-17	**Schools –** Identify the multipliers utilized to calculate the number of school children generated. Were any other assumptions incorporated into the generation projections?
137	4-17	**Schools –** Identify any school children generation rates or statistics relating to low impact housing, micro-units or co-living units.
138	4-19	**Demand & Absorption –** The DEIS states that "*There is little of no precedent for co-living and micro-units in Westchester County",* and *"…but it is possible they could succeed at the Project Site."* Absent any additional marketing data to support the likelihood that these units would be successful, if they prove to be unrentable, would they be converted to more traditional apartment types? And if so, would associated impacts change (such as the number of school children generated, trip generation, utility demands etc.)?
139	4-19	**Demand & Absorption, 1st partial ¶ –** The DEIS states that "*…life science campuses have 0.31 to 2.50 units of housing for every 1,000 gross square feet of life science real estate…*" Is this housing located on the life science campus themselves, or within some general proximity of the campuses? Clarification is requested.
140	4-19	**Demand & Absorption, 1st partial ¶ –** Where does the 30% figure for on-site housing come from?
141	4-19	**Demand & Absorption, 1st partial ¶ –** Explain why it is assumed that the North 60 will support a "*millennial workforce.*"
142	4-19	**Property Tax Revenue –** The DEIS concludes that the taxes generated from this alternative would be similar to the Proposed Action. The tax generation rates of apartment buildings and bio-tech R&D

#	PAGE #	COMMENT
		buildings vary significantly. Explain how the tax generation would not change.
143	Figure 4-10	**Alternative F: Reduced Impact Alternative –** The schematic plan for this alternative indicates that there would be no viable access to the Developer Parcel. Is there any legal restriction or prohibition from gaining access to this portion of the site through Skyline Drive?
144	Table 4-4	Add to each cell in the table, whether the impact would be less than, equal to, or more than the Proposed Action.
145	Table 4-4	**Geology & Soils, Alternative D –** Generally quantify the "*substantially greater disturbance."*
146	Table 4-4	**Topography & Steep Slopes, Alternative B –** the disturbance area on the County parcel was omitted.
147	Table 4-4	**Topography & Steep Slopes, Alternative D –** Generally estimate the "*substantially greater disturbance."*
148	Table 4-4	**Vegetation & Wildlife, Alternative B –** Generally estimate the amount of tree removal.
149	Table 4-4	**Vegetation & Wildlife, Alternative D –** Generally estimate the amount of tree removal.
150	Table 4-4	**Wetlands & Waterbodies, Alternative D** - Generally estimate the amount of wetland disturbance.
151	Table 4-4	**Traffic & Transportation, Alternative A –** Provide trip generation numbers for the existing residences.
152	Table 4-4	**Traffic & Transportation, Alternative B –** Quantify the "*lower"* trip generation numbers.
153	Table 4-4	**Fiscal & Market Impacts, Alternatives A,B and C –** Identify estimated tax numbers.
154	Table 4-4	**Traffic & Transportation, Proposed Action and Alternative C –** Rectify discrepancy between $9.2 and 9.3 million in taxes

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To: Town of Mount Pleasant Planning Board

From: James Lima Planning + Development

Date: October 31, 2020

Re: JLP+D Economic & Financial Assessment of the North 60 DEIS Submitted by Fareri Associates

Cc: Patrick Cleary

This memorandum summarizes the review and analysis by James Lima Planning + Development (JLP+D) of economic and financial aspects of the Draft Environmental Impact Statement for the proposed large-scale, mixed-use development known as the Westchester BioScience & Technology Center, typically referred to as the "North 60". JLP+D reviewed the DEIS and its appendices for the aspects pertaining to the economic impact, municipal fiscal impact, financial feasibility, and market viability of the North 60 proposal. Leveraging the firm's real estate expertise and additional outside research, this memo assesses the validity of the assumptions the submission uses, as well as the methodologies based upon those assumptions. This memo raises a number of questions and concerns for the applicant to address as a part of the FEIS; JLP+D does not attempt to address those concerns itself as a part of this memo.

It is the opinion of JLP+D that, if built, the North 60 has the potential to be of great economic benefit to the Town of Mount Pleasant and to Westchester County, generally. However, while there is reason to remain cautiously optimistic about the project's potential, the analysis presented here outlines some substantial areas of concern regarding the market demand for specific aspects of the proposal and of the financial feasibility of the project as a whole. Without substantial support from local and, especially, state government entities, the North 60 is unlikely to be built in full.

JLP+D recognizes that COVID-19 has created a host of uncertainties, not just for this project, but for nearly every industry and certainly for the real estate industry as a whole. It light of the pandemic, the applicant should revise its program assumptions, absorption rates, and revenue projections to reflect the significant changes the global pandemic has cause in the way people live, work, collaborate, and relax, as well as its economic implications for real estate market demand.

JLP+D recommends that the Town request that the applicant re-confirm its intention to advance the program as outlined in Chapter 2: Project Description of the DEIS, as there are some concerns that the

current proposal may no longer reflect optimal market opportunities. As the applicant notes on page 4-6 of the DEIS, Alternative C – which features 660,000 square feet of residential development – "is the most economically viable, and potentially preferable alternative considered for the Project Site."[1] If the applicant intends to include a residential component – senior, student, micro-unit, or otherwise – the submission should be updated to reflect that.

To that end, while the true amount of subsidy needed to make the North 60 feasible is uncertain – the applicant should commission professional cost estimation for the project and lay out a more detailed phasing plan – the estimate provided in the report prepared by Weitzman Associates (real estate and economic advisors to Westchester County, included in DEIS Appendix M) provides a starting point, identifying an unlevered funding gap of more than $362 million.* While the use of leverage may reduce the gap somewhat, the true costs are yet to be determined and the currently-proposed mix of uses is likely less profitable than that analyzed by Weitzman.

Funding for large-scale public subsidy for economic development in the life sciences certainly exists in New York State. However, for this level of subsidy to be secured for a project of the scale of the North 60, designed to create roughly 7,000 jobs in suburban Westchester County, there will need to be much more than strong local support. This will require political support and enthusiasm at all levels of government, and an acceptable return on public investment for any such gap financing and other development incentives.

* Note that Weitzman's calculations were conducted on a program that differs substantially from that proposed by the applicant, most notably in its inclusion of 644,000 square feet of residential space. Given that the residential space is the most profitable component of the development in Weitzman's analysis, the mix of uses currently proposed (which lacks a significant residential component) would have an even larger funding gap.

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ECONOMIC IMPACT ASSESSMENT

The economic impact assessment of the North 60 provided in section 3K of the DEIS, starting on page 3K-8, is the portion of the development proposal which most directly makes the argument for the overall economic value that the North 60 development will bring to Westchester County and to the Town of Mount Pleasant. As such, it is critical to understand the assumptions underlying the calculations. To that end, JLP+D has several questions and points of clarification for the applicant to address:

- JLP+D was not able to find in the DEIS any clear delineation of the expected construction budget for the North 60 – either for Phase 1 or for the Master Development Plan in its entirety. As such, while it can be inferred that there is an expected Phase 1 construction budget of roughly $213,400,000 by multiplying the Direct Effect Output from Table 3K-6 by the 3.25-year construction period mentioned on page 3K-8, there is insufficient information to accurately evaluate whether those numbers are valid. The Town should request that the applicant provide details on the cost assumptions as well as the underlying information that supports the numbers provided
    - Relatedly, while one can infer the total development cost for Phase 1, there is no similar length of time offered for the Master Development Plan construction period. The applicant should provide that information along with the cost assumptions
    - We highlight that in the Weitzman report they note that through their own conversations with cost estimators and construction professionals, those experts suggested that the Fareri Associates cost estimates may be underestimated by some 44%. If accurate, this should be a very significant concern for the Town as it considers the financial feasibility of individual project components, as well as the project's overall viability. While a higher construction cost has the effect of actually increasing the economic benefits to the area during construction, it obviously adversely impacts the financial feasibility of the development, which makes it less certain whether the development will occur at all. JLP+D concurs with the Weitzman recommendation that the applicant should commission a detailed cost estimate for the development
- The accounting for jobs per square footage of use (in Table 3K-3) appears fairly standard. However, these assumptions should be reviewed again in light of recent trends to ensure that they are really representative of what can be expected at the North 60, because they underly both the economic impact analysis (as an input to the Operational Economic Impacts) and because they also affect the absorption rate and lease-up time, discussed elsewhere
    - It is unclear whether the employee estimates in Table 3K-3 includes an allowance for some degree of vacancy, which should be assumed and included

- The estimation of employees per square foot are inconsistent with one another. Multipliers for Bio-Tech are calculated based on Net Square Footage, while those for Medical Office, Retail, and Hotel are based on Gross Square Footage, even though there is a number provided for Gross Square Footage calculation for "R&D or laboratory" space in the same U.S. Green Building Council table that the other numbers come from.[†] The Town should ask for clear justification for the differences in methodologies
- It is not clear that the multipliers cited for number of employees per square foot will reflect the new workplace realities impacted by the pandemic, but in any case, the applicant should update these figures to make its best informed projections with respect to office square footage allowances per worker and other space modifications in the workplace. JLP+D recommends that the applicant make a detailed analysis of expected space needs by use, based on local data which reflect the Westchester market reality
    - Observers have noted that many industries have seen declining square footage per employee since 2010[‡]
    - However, COVID-19 has prompted many industries to increase the amount of square footage per employee,[2] potentially offsetting previous trends toward smaller per-person workspaces

Taking the inputs as given, the methodology of the IMPLAN analysis appears sound and conforms to industry standards. In the review, it is worth noting that all outputs (in Table 3K-6, Table 3K-7, Table 3K-8, Table 3K-9, and Table 3K-10) appear to be annual numbers, rather than aggregate values. For local review, it is also important to note that IMPAN tax impacts are not calculated based on specific local tax rates or nuances, but are, rather, high-level estimates derived from national averages. It is recommended that the applicant conduct or commission a local tax impact study that would calculate the impacts based on inputs specific to the Town of Mount Pleasant.

[†] Available from USGBC here: https://www.usgbc.org/credits/new-construction-existing-buildings-commercial-interiors-core-and-shell-schools-new-constr-3

[‡] For example, see: Barron, J. (2015) "As Office Space Shrinks, So Does Privacy for Workers." The New York Times, Feb. 22, 2015. https://www.nytimes.com/2015/02/23/nyregion/as-office-space-shrinks-so-does-privacy-for-workers.html

MUNICIPAL FISCAL IMPACT ASSESSMENT

According to the applicant's DEIS, the North 60 development, as proposed, would have a number of fiscal impacts on the Town of Mount Pleasant, both in terms of revenue and costs. The applicant estimated the benefits using an income capitalization approached based on their preliminary estimation of net operating, applying local tax rates. JLP+D has consolidated the costs from the various locations they are articulated in the DEIS.

Benefits to the Town and related entities[3]:

- Phase 1 property taxes (annually, once phase is complete):
  - $133,000 in Town taxes
  - $40,000 in combined taxes for Mount Pleasant, lighting, library, and refuse
  - $1,100,000 in Mount Pleasant Central School District taxes
  - $57,000 in Pocantico Hills Central School District taxes *(not new – continues current)*
- Master Development Plan property taxes (annually, once complete):
  - $823,000 in Town taxes
  - $246,000 in combined taxes for Mount Pleasant, lighting, library, and refuse
  - $4,919,000 in Mount Pleasant Central School District taxes
  - $1,236,000 in Pocantico Hills Central School District taxes

Costs to the Town and related entities:

- The Proposal indicates on page 3H-9 that either the Town or the County will own the water infrastructure onsite and be responsible for maintaining it
  - Estimated demand is roughly 35,000 gallons per day in Phase 1 and 281,000 gallons per day in full build-out (or 254,000 gallons per day with mitigation measures)
  - Water used will be paid for with service fees
- Development will also connect to the Town of Mount Pleasant Sewer, and infrastructure will be owned and maintained by the Town (per page 1-5)
  - Estimated demand is 106,180 gallons per day of sanitary sewage[4]
- Appendix S estimates 8 new school students if the development included 660 "low-impact" housing units, all of whom would be in the Mount Pleasant CSD district portion of the development
  - These 8 students would generate $126,960 in marginal costs[5]
  - If the applicant decides to update the proposal to include housing, JLP+D recommends that they conduct a market study to determine the mix of unit types that would be viable and then to reconduct a school student generation study based on the actual proposed development

It is difficult to accurately assess the validity of the estimates provided by the applicant, because the assumptions upon which they are built are not clearly delineated. For instance, the applicant notes that the estimation is based on an income capitalization approach, but do not clearly indicate an estimated income number, nor the way it was arrived at – no financial pro forma for the proposed development is provided. The Town should request from the applicant additional documentation supporting the NOI and tax calculations. Separate from this SEQRA, the Town should review the project's financial feasibility documentation if and when any subsidies and/or incentives are sought for the North 60.

We note that the applicant has declined to estimate the sales tax revenue and hotel tax revenue because the retail tenant mix and hotel occupancy rate, respectively, are not known. However, before undertaking a development of this scale, it is reasonable to expect a developer to have an estimate of their expected revenues and hence to be able to share estimated tax payments based on those numbers. Both retail and hotel sectors have been significantly impacted by COVID-19 (see the Market Assessment below), so with that in mind, it is all the more important for both the developer and the public to have a shared sense of what to expect from those components of the project.

JLP+D recommends that the Town request clarification to confirm that, while the Town will own the sewer infrastructure on the North 60 site and may own the water infrastructure (depending on whether the City or County water district is extended), the applicant will pay for the construction of that infrastructure. The DEIS notes on page 3I-18 that improvements to road infrastructure would be funded by the applicant.

FINANCIAL FEASIBILITY ASSESSMENT

The applicant's proposal does not include a financial feasibility assessment for the development. A key part of the Town's ability to evaluate the advisability of the development – and the municipal service delivery expense increases that the Town is being asked to commit to, including rezoning and infrastructure maintenance – rests upon an understanding of the subsidies required to make it a reality and of the likelihood that the development if ever to be completed. JLP+D recommends that the Town request such a feasibility assessment from the applicant.

The Weitzman report completed on behalf of Westchester County and provided in Appendix M does include a financial feasibility analysis, but it should be noted that it differs from the applicant's Proposed Action. Specifically:

- The financial feasibility analysis has not been conducted on a development program that matches the one proposed as a part of the DEIS, making it difficult to judge the true financial position of the Proposed Action (in Weitzman's calculations 644,000 square feet have been reallocated from life sciences space to residential space)
- There is no assessment of the development under a realistic financial scenario, as the only financial feasibility analysis offered in on an unlevered basis, which does not reflect the reality that applicant will almost certainly be using a variety of financing mechanisms to develop the North 60

Given these two caveats, Weitzman's analysis suggests a project funding shortfall of roughly 21% of projected development costs, or $362 million. A development in which the 644,000 square feet that Weitzman allocates to housing are instead used for life sciences lab space is likely to generate lower revenue and require higher subsidy.

In Weitzman's assessment, the residential component has a positive net present value (NPV) of $90 per gross square foot over a 30-year project timeline, while the life sciences portion has a negative NPV of ($238) per gross square foot. The dramatically lower NPV incorporates factors such as annual income, lease-up absorption time, increased development costs, and other factors, and suggests that the actual subsidy needed to make the North 60 a reality would likely be markedly higher under the Proposed Action than under Weitzman's mix of uses. For instance, multiplying the $328 per gross square foot difference in NPV by the 644,000 reallocated square feet would result in somewhere around $200 million in additional shortfall.

MARKET ASSESSMENT FOR PROPOSED USES

This is an uncertain time for real estate markets in almost every sector. The current market is not the one in which the North 60 development proposal was created and the assumptions underpinning it can no longer be taken for granted now that established patterns have been upended by COVID-19.

At this time, for a project this large, it is essential to assess the macro trends that will drive the coming years, not just the coming months. At a high level, global real estate firm CBRE indicates that alternative real estate investments including medical office, life sciences, and student housing historically offer downturn protection, and that demographic trends including an aging population and a growing demand for education amongst the middle class are driving growing demand for senior and student housing.[6] Cushman & Wakefield indicates that the central business district rent premium has been declining and will likely continue to do so[7] and that suburban vacancy rates – typically higher – have nearly caught up to the rates in central business districts,[8] suggesting that suburban employment centers are becoming more competitive. CBRE says signs indicate that organizations are going to continue to locate near talent, despite the transition to a hybrid/remote workforce, and are going to be looking for buildings with indoor air quality and touchless technology as factors in deciding where to locate, all of which can be to the benefit of a new development near an educated workforce.[9]

However, it is worth recognizing the challenges that COVID-19 brings to this project. For instance, research from CBRE indicates that office leasing in Westchester County was "38.7% below the five-year quarterly average" in Q2 2020.[10] Additionally, the impacts of the COVID-19 will not impact all sectors proposed for the North 60 in the same ways and will interact with preexisting market trends. According to analysis from Cushman & Wakefield, the life sciences market will be a winner in the recovery, as it is already benefiting from long-term demographic and structural shifts and is now seeing those accelerated by COVID-19. Multifamily residential and office are negatively impacted by COVID-19 but have long-term structural trends in their favor and will be in the middle in terms of recovery. Meanwhile, retail is the most challenged sector, as it had already been undergoing substantial structural changes and has also been the hardest hit by the COVID-19 lockdown.[11]

Upon review, the *North 60 Market and Financial Feasibility Study* prepared by Weitzman Associates for the Westchester County Department of Planning – included in the applicant's DEIS as Appendix M – provides valuable insight to the proposal, though it needs to be read with some context. Overall, the Weitzman assessment of the applicant's proposal is robust and grounded in a strong combination of market data, local knowledge, and industry insights. It provides good context for a reader looking to understand the impact of this proposed development. However, some of the assumptions and conclusions in the Weitzman report do not appear to be clearly supported. For instance:

- Weitzman recommends building residential units as a part of the North 60, at a rate of roughly 30% of the generated demand that employment at the site will create. However, the rationale for why only 30% of these residential units should be built on site is unclear, when three of the four referenced case studies appear to have built most or all of the demanded units on site[§]
- Weitzman's scan of the medical office landscape suggests rents in the $22-$30 range, but they choose instead to use the $40 per square foot rate from Fareri Associates' nearby building, without comment on whether the types of tenants and leases seem realistic to expect for the North 60, especially given WMC ability to veto tenant uses
- In several absorption tables,[**] the average absorption is divided by one year fewer than the number of years summed (i.e., 11 years are added together, then divided by 10), which slightly overstates the absorption rate, numbers which are then cited in the DEIS itself

The applicant should address these issues in a financial feasibility assessment of their own, providing their own financing assumptions and pro forma analysis, along with rationale for program allotments and rent rates expected.

Again, the Weitzman analysis also raises some concerns about the viability of the North 60 as proposed:

- As noted, the financial feasibility analysis has not been conducted on the proposed mix of uses, nor using real-world financing assumptions. However, any shift towards the proposed mix of uses would be a shift away from the most profitable uses (i.e. multifamily residential) and towards uses already calling for a large subsidy (namely, life sciences research space)
- Under the current, unlevered analysis, there is an identified $362 million gap, which would need to be filled by subsidies and incentives. Given that Weitzman notes that New York State has a relatively weak incentives market and that the state's entire Life Sciences Initiative (notably, not aimed primarily at real estate) is only $620 million, this will require substantial political will to achieve. Without a realistic levered assessment to determine the true gap, it is impossible to say whether there are sufficient funds available from state, local, and possibly federal programs to make this a success if it is determined to be worth public subsidy

Given the uncertainty, JLP+D recommends that the Town request that the applicant demonstrate project viability to ensure that the mix of uses and timing will be successful in today's market and provide rationale for the ultimate mix of uses the proposed in the FEIS submission.

[§] See section on "Life Science Campus Case Studies: Residential Development" in Weitzman report (Appendix M), pages 308-313.

[**] Tables 29 & 31 (on pages 99 and 101, respectively) under "Life Sciences Market Analysis" and Tables 54 & 55 (on pages 144 and 146, respectively) under "Healthcare Market Analysis" in the Weitzman report

Market Assessment: Life Sciences

Development Proposal
Phase 1: 220,000 ft²
Full Build-Out: 2,144,000 ft²
Weitzman Gap Estimate: -$238 gap / gross ft² (pre-COVID)

At its core, the North 60 development is about creating a life sciences campus, so the success of the project will, to a large degree, hinge upon whether the life sciences space is successful. This is true both conceptually and literally: per paragraph 4.2(c) of the lease that Fareri Associates has with Westchester County for the County-owned portion of the project site, the developer is obligated to substantially complete the 220,000 sf of life sciences space in Phase 1 before beginning any subsequent phases of development or be found in default on the lease.

INDUSTRY ASSESSMENT

According to JLL's *2020 Life Sciences Real Estate Outlook*, "The life sciences industry is one of relatively few to benefit from pandemic-related tailwinds… Real estate will in turn play an essential role in maximizing the efficiency and results of life sciences real estate."[12] In their midyear global recovery and market outlook report, CBRE concurs, identifying life sciences as one of the top three industries for real estate investment.[13] While expensive to build in comparison to other uses, life sciences is an industry that has both short-term and long-term trends working in its favor.

LOCAL MARKET ASSESSMENT

The site has several advantages as a life sciences location, including proximity to New York and to the Westchester Medical Center (WMC). The Weitzman report (prepared pre-pandemic) notes that there is interest from companies in leasing life sciences space in Westchester County, but that a lack of available space has left them unable to do so, indicating an opportunity at the North 60. JLL's 2018 "Life Sciences Outlook" notes that "the sector was one of the only ones to show growth in the county during the last recession, providing optimism that it might do the same amidst the current one.[14] Meanwhile a recent article in *The New York Times* notes that the life sciences market remains strong in the City and with a competitive price differential between $105 per square foot in Manhattan[15] and $25 per square foot in Westchester County,[16] Weitzman's assessment that there is continued opportunity to capture overflow demand from New York City seems likely to remain valid.

However, their analysis also indicates that, under conservative estimates, the roughly 2 million gross square feet of space would be absorbed sometime between 2044 and 2060.[17] A more optimistic scenario, in which the North 60 captures spillover demand from nearby markets (i.e. if demand in NYC outpaces supply), offers a substantial rent discount, conducts a strong marketing campaign, and/or receives substantial state incentives, it could be fully leased sometime between 2034 and 2042.[18]

It should be noted that Weitzman's market absorption calculations are based on a somewhat lower amount of life sciences space than in the Proposed Action, and that their financial feasibility analysis was conducted on a substantially lower number than even that number (~30% less than Proposed Action square footage), so these numbers should be seen as relatively optimistic.

Market Assessment: Healthcare/Medical Office

Development Proposal
Phase 1: 100,000 ft²
Full Build-Out: 400,000 ft²
Weitzman Gap Estimate: -$62 gap / gross ft² (pre-COVID)

As a complement to the life sciences lab space at the North 60, there is a substantial healthcare component included. It is important to note that the current lease with Westchester County gives Westchester Medical Center a right of first refusal and a right to avoid competition over any healthcare use proposed at the North 60 if that use exists at WMC at the time it would open. Without a change to the lease to eliminate those terms (particularly the right to avoid competition), there is a risk that the North 60 may find itself struggling to find approved healthcare tenants for the space. The applicant should approach the County to attempt to renegotiate that component of the lease.

INDUSTRY ASSESSMENT

Cushman & Wakefield reports that, per the Bureau of Labor Statistics, "healthcare spending has continued to increase in dollar amount and as a share of household expenditures, regardless of whether the economy is expanding or contracting."[19] In light of COVID-19, JLL reports that trends indicate that the pandemic will accelerate several trends, including the segmentation of wellness and acute care real estate (i.e. moving more outpatient services out of hospitals), increased demand for wellness services, and co-location of outpatient services (primary care, specialty care, imaging, pharmacies, labs) within retail locations.[20] They see telehealth services having a short-term negative impact on healthcare real estate, but that in the long term, it will actually drive more people to initial and then follow-up visits, making the impact neutral or positive.[21] Overall, JLL remains optimistic about medical office, as both cyclical and structural (such as demographic) trends support the industry.[22]

LOCAL MARKET ASSESSMENT

Locally, the prospects for medical office/healthcare space appear more mixed, despite the apparent value of being a part of a life sciences campus and adjacent to WMC. Cushman & Wakefield notes that, while nationwide vacancy has been low and stable, even back in 2019, New York vacancy had increased slightly while rent had fallen, and that net absorption in 2019 was the lowest in more than 10

years.[23] More locally, Weitzman notes that there are more than 1,800 doctors working within a 5-mile radius of the North 60 and the market is relatively saturated compared to other places and that there is little evidence of unmet demand in most specialties.[24] They indicate that competition exists in the form of an abundance of existing medical office space in the area, excess capacity at the newly opened WMC Ambulatory Care Pavilion, and lower-cost conversions of traditional office space to medical office space.[25]

It should be noted that while Weitzman recommends in their market analysis to potentially slow down the construction of medical office space due to the lack of demand, they do not do so in their financial feasibility analysis, where healthcare space is one of the relatively-stronger performers. This appears to be driven by the assumption that medical office space at the North 60 will be able to match the $40 per square foot from Fareri Associates building nearby, a location which is not subject to a WMC non-compete and which commands 30-50% more than other properties that Weitzman analyzed in the area. The applicant should provide evidence for the healthcare space demand that they see in the area to justify rent and absorption rate assumptions.

Market Assessment: Retail

The retail industry, which was already in the midst of substantial structural changes including a shift towards more online purchases at the expense of brick-and-mortar retail purchases, has been substantially impacted by the COVID-19 pandemic – though both of these trends have impacted some subsectors more than others. This combination of short-term uncertainty and long-term headwinds make the retail component of the North 60 far from a sure success.

Development Proposal
Phase 1: 80,000 ft²
Full Build-Out: 214,000 ft²
Weitzman NPV Estimate: +$167 per gross ft² (pre-COVID)

INDUSTRY ASSESSMENT

According to Cushman & Wakefield, there is pent up retail demand in the U.S. due to the pandemic, but the U.S. was already oversupplied with retail and many concepts will need to be reimagined.[26] CBRE says consumers will make fewer shopping trips while spending more per trip, and will favor open air shopping centers.[27] JLL notes that retail rents are forecasted to fall 5.4% in 2020 and return to growth in 2022, while retail vacancy is expected to reach 6.1% in 2021 and won't return to pre-COVID levels until 2024.[28]

As noted previously, Cushman & Wakefield characterizes retail as the most challenged industry sector, one that had already been undergoing substantial structural changes before also being the hardest hit by the COVID-19 lockdown,[29] and notes that "The most challenged retail sectors for small businesses include restaurants, bars, health clubs and beauty salons,"[30] which may cause difficulties in establishing the vibrant retail center envisioned for the North 60. However, they also indicate that retailers who remain in business will be looking to move to higher-quality retail locations,[31] which could benefit the North 60 if class A retail can be brought to the market in a reasonable timeframe, though that is not without risk.

LOCAL MARKET ASSESSMENT

Prior to COVID-19, the Weitzman report notes that vacancy in the West I-287 retail submarket was just 2.6% as of March 2019.[32] However, Cushman & Wakefield notes that the New York metro area was already seeing uneven net absorption of retail in 2019, with rising vacancy rates.[33]

Of particular note is the fact that Weitzman indicates that in order to be successful, the North 60 will need to capture more than its fair share (7%) of local retail demand in both Phase 1 (where it may need to capture a slightly elevated amount) and in full build out, where Weitzman suggests the development may need to capture roughly twice that percent of local retail sales.[34] While they also indicate that they expect the North 60 retail to have a neutral impact on local retail due to the increased demand from workers and potential residents onsite, we believe that Fareri Associates should examine this potential concern in detail.

We also note that Weitzman's market scan (from industry service CoStar) identifies a retail desert, with just a Panera and Walgreens nearby and a Starbucks located a 10-minute drive away. However, we are aware that there are several other fast food, fast casual, and sit-down restaurants just to the west and northwest of the North 60, so we are concerned that retail analysis to date may underestimate the amount of competition retail (and especially food service) at the North 60 may face and, hence, overestimate its likely success.

Given the structural changes in the retail market combined with the uncertainty from COVID-19, the applicant should put forth a clear plan that would signal a successful lease up for at least the Phase 1 portion of the retail on site.

Market Assessment: Hotel

In light of COVID-19, a hotel is perhaps the most difficult use to see a successful outlook for at the North 60 in the near future. With a presumed focus on capturing business travelers visiting either the life sciences companies onsite or the medical and educational institutions across the street, the primary traveler base will be severely eroded for several years, though there may continue to be demand from the families of patients at Westchester Medical Center.

Development Proposal
Phase 1: 100,000 ft²
Full Build-Out: 100,000 ft²
Weitzman Gap Estimate: -$327 gap / gross ft² (pre-COVID)

INDUSTRY ASSESSMENT

Overall, the hotel industry is expected to perform "modestly and unevenly" until a vaccine or major therapeutic breakthrough is found (projected in analysts' estimates at mid-2021, but unknown).[35] Proposed hotels that have not yet started construction are likely to be delayed, and "[i]n suburban and urban markets, operators report extensive discounting to secure even modest occupancy as hotels of all caliber compete for the same few guests."[36] Per Gilda Perez-Alvarado, CEO of JLL Hotels and Hospitality Americas, leisure travel will come back first, followed by business, and then large group hotel bookings.[37] And according to CBRE, after recessions in 2001 and 2008, it took RevPAR (Revenue Per Available Room, a standard industry measure of income) 4-5 years to recover to pre-recession rates and it took about 2.5 years for U.S. demand to recover.[38]

A September travel industry report from industry research firm Skift and global consultancy McKinsey & Company indicates that hotel demand and revenues may not recover until 2023 and 2024, respectively.[39] They concur that business travel recovery will lag that of leisure travel.[40] Forecasts from hospitality data firm STR and industry research firm Tourism Economics agree that occupancy will not recovery until 2023 and suggest that Average Daily Rates for hotel rooms may not recover for five years.[41]

LOCAL MARKET ASSESSMENT

All of this suggests that a hotel at the North 60 is unlikely to be successful in the near term, though one that comes online 3 to 5 years from now may avoid the market disruptions currently being experience and expected to endure for the next several years. While Weitzman's analysis indicated that a hotel was "a significant loss leader, but… an essential component of a mixed-use campus like North 60,"[42] given the changes to the hotel market over the past year, we suggest the applicant should provide evidence from hotel market experts that assumptions for the projected development and operational timetable are supported.

Market Assessment: Living Science Center

Development Proposal
Phase 1: 0 ft²
Full Build-Out: 142,000 ft²
Weitzman Gap Estimate: -$293
gap / gross ft² (pre-COVID) – blends museum + education

In whatever format it takes – as a life science children's museum, educational learning space, or a combination of the two – the Living Science Center will require substantial outside partnerships to come to fruition, principally philanthropic. It would be beneficial if Fareri Associates can show evidence that a partner is already lined up for one or both of those uses. A children's museum will likely require one or more major donors to provide an enabling gift. For the space to be used by an educational institution – a local community college or university, as has been suggested – it will require having an agreement in place with an educational partner. In the absence of either of these agreements and because the living science center is not a part of the Phase 1 development, there is a risk that funding cannot be secured and this component may not be built.

Market Assessment: Residential *(Not part of Proposed Action)*

Development Proposal
Phase 1: 0 ft²
Full Build-Out: 0 ft²
Weitzman NPV Estimate: +$90
gap / gross ft² (pre-COVID) – for 644,000 ft²

While the applicant has not proposed a multi-family residential component as a part of their current North 60 development program, it is worth examining the sector due to the fact that it has remained one of the strongest performing real estate investment asset classes in the region. Weitzman's analysis indicates it is among the most profitable uses for the site. Fareri Associates themselves allow that including a residential component may make the development more economically and financially viable. JLP+D's research indicates that residential is one of the sectors with the greatest potential for success from a market standpoint, both in the immediate term and in the long run.

INDUSTRY ASSESSMENT

JLL indicates that housing is seen as a bright spot in an otherwise troubled economy[43] and CBRE says that multi-family housing remains relatively recession-proof is are expected to both decline less and recover faster than other assets.[44] Cushman & Wakefield indicates that apartment absorption should be strong in 2022,[45] which could correspond well to the timing that the North 60 might come online. Multiple sources including JLL[46] and Cushman & Wakefield[47] note that demographic trends are behind

several potentially-beneficial trends, including increased demand for both multi-family housing amongst 20-somethings and a trend towards the suburbs.

Subsector: Senior Housing

CBRE indicates that demographic trends (an aging population) are driving growing demand for senior housing.[48] JLL reports that COVID-19 arrested a 12-year growth cycle for senior housing, but that within eight weeks of the start of the pandemic, the sector was already showing signs of rejuvenation, and also indicates that there is a long-term supply shortage.[49]

Subsector: Student Housing

CBRE notes that student housing historically offers downturn protection and that, as with senior housing, demographic trends are driving increased demand for it.[50] In a recent industry roundtable, they also note that student housing has performed better during the recession, with rent collections slightly above multi-family as a whole (as of June) and pre-leasing for fall semester lagging behind 2019 by only 2.3%.[51]

LOCAL MARKET ASSESSMENT

It is reasonable to expect that if a new development proposing between 2 and 3 million square foot of employment-generating real estate across several sectors is developed in a place like Mount Pleasant which has seen minimal population growth over decades, there will be additional demand for housing from people who will work at the site. Weitzman's estimate (based on similar suburban campuses) that somewhere around 2,000 – 3,000 units would be needed near this life sciences development[52] provides one benchmark. The assumption by Weitzman that only 30% of the units for which the proposed project generates new demand would be built directly onsite can be debated and perhaps an even higher percentage is worth considering. JLP+D recommends that the applicant provide an assessment of the impact that the North 60 development would have on the local housing market demand and pricing, as well as on labor force attraction and retention efforts at North 60 (which depend on the availability of quality housing choices nearby), in the absence of (or with an insufficient amount of) onsite housing as a part of the development.

There is, of course, a concern with any major residential development that it may adversely impact school budgets, bringing in a substantial new school-aged population. Fareri Associates' submission includes a School Student Generation Study, which assess the effect that "low-impact" housing at the North 60 would have, estimating that the proposed apartments would have approximately 8 children

living in them. The methodology for estimating the impacts of the assessed units appears sound, but JLP+D has concerns about whether the proposed unit mix is reasonable:

- As noted elsewhere, Fareri Associates has not actually proposed any residential units for the North 60, so this exercise in assessing a mix of apartments that primarily consists of extremely small units (studios, micro-units, and co-living situations comprise 80% of the apartments), is not one that appears to be grounded in an assessment of whether this unit mix would make sense for the site
- As Weitzman notes, there is little precedent for co-living or micro-unit models in Westchester County and they do not recommend developing them in this location[53]

Finally, we find it important to note that while senior housing seems to show strong potential at the site and that Westchester Medical Center does not currently offer senior or assisted living facilities, if they were to choose to do so, those are both covered under the "non-compete" component of their lease with Westchester County.

NOTES

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[3] Fareri Associates and VHB. (2019) "The North 60 Draft Environmental Impact Statement," chapter 3K, page 3K-6 - 3K-7.
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[5] VHB. (2019) "School Student Generation Study." DEIS Appendix S, page 10.
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[9] CBRE. (2020) "CBRE Expert Roundtable: Site Selection & Economic Development in the Era of COVID-19," Jul. 15, 2020. https://www.cbre.us/research-and-reports/CBRE-Expert-Roundtable-Flash-Call-July-15
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[12] JLL. (2020) "2020 Life Sciences Real Estate Outlook," page 5.
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[14] JLL. (2018) "Life Sciences Outlook: Westchester County," page 2.
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[20] JLL. (2020) "Healthcare Real Estate Outlook: Adapting to a New Reality," page 7-8.
[21] Ibid., page 3-6.
[22] Ibid., page 9-10.
[23] Cushman & Wakefield. (2019) "Vital Signs: Healthcare and Medical Office Report (Fall 2019)," page 11-13.
[24] Weitzman report. DEIS Appendix M, page 112.
[25] Ibid. p. 133.
[26] Cushman & Wakefield. (2020) "How COVID-19 is hitting the reset button on the global economy and property." The Edge Magazine, Vol. 5, page 4-7.
[27] CBRE. (2020) "Global Real Estate Market Outlook 2020: Midyear Review (August 2020)," page 23.
[28] JLL. (2020) "Retail outlook: COVID recession creates retail winners and losers," page 9.
[29] Cushman & Wakefield. (2020) "How COVID-19 is hitting the reset button on the global economy and property." The Edge Magazine, Vol. 5, p. 4-7.
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[31] Ibid., page 2.
[32] Weitzman report. DEIS Appendix M, page 200.
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[34] Weitzman report. DEIS Appendix M, page 186.
[35] Cushman & Wakefield. (2020) "U.S. Lodging Industry Overview: H1 2020," page 2.

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[37] Cook, J. (2020) "How will the hotel industry recover from COVID-19?" JLL, Jul. 30, 2020. https://www.us.jll.com/en/trends-and-insights/research/building-places/how-will-the-hotel-industry-recover-from-covid19
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[44] CBRE. (2020) "Global Real Estate Market Outlook 2020: Midyear Review (August 2020)," page 30-31.
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[50] CBRE. (2020) "Global Real Estate Market Outlook 2020: Midyear Review (August 2020)," page 40.
[51] CBRE. (2020) "CBRE Roundtable: Student Housing State of the Market Summary Recap." CBRE, Jun. 25, 2020, page 3.
[52] Weitzman report. DEIS Appendix M, page 309.
[53] Ibid., page 306-308.

Carolyn Saracino

From: Sarah Miles Smiley <sarahsmiley28@gmail.com>
Sent: Sunday, November 01, 2020 5:16 PM
To: Carolyn Saracino
Subject: North 60 DEIS comments

Dear Mt. Pleasant Planning Board,

I spoke at a public hearing on The North 60 project, and am submitting some additional comments here.

Given that gas is now understood to be a major contributor to global warming, and NYS climate policy (the 2019 Climate and Community Protection Act) will necessitate the phase-out of gas over the next 30 years, why does the developer plan to use interruptible gas instead of renewable heating technologies such as ground source heat pumps?

The DEIS states that the project is not expected to significantly impact regional greenhouse gas emissions, but that seems hard to believe considering the size and scope of the project and the plan to combust fossil fuels on-site. What is the basis for the developer's assumption? Have they calculated the potential GHG emissions including the methane from gas (and backup oil)? New York State now requires that policy makers account for methane when calculating greenhouse gas emissions, and the developer should do so as well.

The DEIS also makes a misleading statement that "natural gas emits the least amount of carbon dioxide emissions compared to other fuel types such as oil or coal." This ignores the fact that methane leaks from gas infrastructure are 86 times more potent than carbon dioxide at trapping heat in the atmosphere (hence the change to NYS policy mentioned above). Additionally, methane leaks threaten wildlife (including trees), water quality, and carry the risk of explosions.

Ground source heat pumps (aka geothermal) utilize the steady temperature underground by circulating warm air into buildings in the winter and cool air into the buildings during the summer, without combusting fossil fuels, and avoiding the need for air conditioning. Geothermal is more efficient than gas or oil, and the heat pumps run on electricity that can leverage renewable energy generation like rooftop solar. Installing geothermal at the time of construction can be more cost effective than installing conventional HVAC, and there are generous incentives available from NYSERDA and Con Ed. Induction stoves (run with electricity) are a cleaner, healthier alternative to cooking with gas, which emits toxins that impact indoor air quality.

Building out local gas infrastructure for this development does not make sense when the state is phasing out the use of gas. Ratepayers will be stuck paying the bill for pipes that will become stranded assets by the time the project is finished. The developer is proposing "interruptible" gas because the utility's gas moratorium prevents access to 'firm" gas service. The moratorium is a result

of gas pipelines being rejected and the state policy shift toward renewable thermal systems. Why build a large, new development with an unreliable fuel source?

The North 60 proposes to be innovative, community-oriented development focused on technology and healthcare. I urge the developers to consider non-fossil fuel technology that will significantly reduce the project's climate impact, and protect our natural resources, public health, and future generations. We are at a critical juncture for reducing our current use of fossil fuels; we cannot afford to add to it at the scale of this development.

Thank you for your consideration.

Sarah Smiley
5 Farrington Avenue
Sleepy Hollow
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Carolyn Saracino

From: Katherine Meladossi <mellov6@yahoo.com>
Sent: Sunday, November 01, 2020 4:35 PM
To: Carolyn Saracino
Subject: Draft Environmental Impact Statement for the North 60

Dear Ms. Saracino,

My name is Katherine Meladossi and I reside at 21 Thomas Place in Valhalla.

I have been a resident of Valhalla for over 40 years and have had the pleasure of raising 4 children in this beautiful area. I am also blessed to have 6 grandchildren that all reside within 10 minutes of the town of Mt. Pleasant.

I have been a teacher and director of a local preschool for over 25 years so the health of well being of this generation and future generations is at the essence of my soul and at the heart of my values.

My concern surrounding this project centers on the climate and therefore health impact. Has the developer calculated the climate impact of using gas for this project? Can the developer use renewable heating alternatives such as geothermal (clean energy instead of dirty fossil fuels)? Geothermal is also a more advanced technology and there are significant incentives for the developer.

This is a tremendous, long term project whose basis is centered on creating research and lab facilities to promote the health and well being of this and future generations.

It only seems logical and responsible to have the energy source for such an undertaking be in alignment with a positive and beneficial impact on current and future generations.
By requiring the use of clean/geothermal energy for this project, we have the opportunity here to be part of something profound and historic and to pave the way for future developments.

Your kind consideration is greatly appreciated.

Sincerely,

Katherine Meladossi

Sent from my iPad

To the Mount Pleasant Planning Board,

We are residents of the town of Mount Pleasant, living in Hawthorne, very close to the North 360 project. Our concerns are the following: we are genuinely concerned about increased traffic through our neighborhood as traffic is already very heavy during rush hour periods as a result of those working at the Westchester Medical Center and 19 Bradhurst Ave medical facility. Are request is NOT to have a traffic light at the end of Belmont Road and the Saw Mill River Road but a either a one way out sign or a no thru traffic sign preventing traffic from going into this residential neighborhood.

Additionally, a request for the same at West Stevens Ave and Old Saw Mill River Road.

Pythian Ave is used by the young and old alike as a street for walking from the early hours to late in the evening because it is a relatively flat road. Mothers pushing strollers, senior citizens out power walking and children bike riding is common. Proof of that statement come during a typical Halloween night to see the volume of walking traffic it gets because it is considered level for the most part. It is a matter of time before someone gets hits by a car at the corner of Belmont Road and Pythian Ave because the high-volume traffic does not stop for the Stop sign. You are aware of what happened across from Gordo's Restrauant on Elmwood Ave and Commerce Street, a pedestrian was struck a few years ago. We do not want that to happen again here. We are also requesting a one way sign out on Joyce Place and Bradhurst Ave so no thru traffic comes into this residential neighborhood.

In following this request, you would be directing traffic on Bradhurst Ave and on Saw Mill River Road to go around the neighborhood in its entirety to Broadway and Brighton ave. We need to stop what is currently a cut thru from 9A to Bradhurst in this residential neighborhood. Please remove the double yellow lines on Joyce Place, Pythian Ave and Belmont Ave and keep this neighborhood safe.

With all plans in place, how can we ensure that the flow of traffic does not use this area as a cut through, which could be potentially hazardous to our neighbors?

How are you planning on dealing with the increase in traffic as a result of this project to Bradhurst Avenue? And keeping it out of the residential neighborhood?

We are concerned also about the increase in noise pollution and light pollution that will be evidence as a result of the North 60 project. Many studies show that noise and light pollution can be harmful to humans as well as animals. How are you planning to alleviate the noise and light pollution that this project is bound to have on our community? We do not want what currently exist on the Westchester Medical Center, a light bar along the outline of the top and side of the building facing our neighborhood. It emits too much light. Will you please not allow it to happen again with North 360?

Lastly, we are concerned about the environmental impact of this project. How are you planning on dealing with the increased amounts of carbon dioxide and methane on our air and water? What plans are there for forestry? Tall tree plantings? Etc, to beautify our neighborhood.

Thank you for addressing these concerns.

Peter & Rita Curtin

121 Pythian Ave

Hawthorne, NY 10532

January 13,2021

Tom Sialiano

109 Warren Ave

Hawthorne, N.Y. 10532

Pat,

Enclosed are a couple of additional suggestions to investigate and research concerning the DEIS for the North 60 project. Can you please add these suggestions or recommendations to the document so they can be researched and analyzed by the correct professional that has expertise in the category of the question being asked.

1. Please have a professional in the field of public safety research the possibility of a satellite Firehouse and Police station that is part of the overall plans on the property.

2. A new methodology and independent professional must be hired to re determine the number of school children generated by the full build out of the project. The current figure of 8 children is not plausible considering the number of residents that will occupy the site upon completion of the project.

3. An alternative must be added and studied that only allows housing for the current R-20 piece of the property.

4. All Micro and SRO units that have a shared kitchen and living space must be eliminated because this style of housing due to COVID is dangerous and obsolete due to health concerns.

5. Research from a third party must be conduct to fully analyze the affects upon community services due to an increase of 4.4 percent of our Town population as result of the completion of this project. This question includes all services provided by the town such as: police department, fire department, sanitation, road maintaining, and governmental services etc.…

6. An alternative for the project that is suggested to research is no housing on the proposed development of the North 60.

Hon. Tom Sialiano

Mount Pleasant Councilmember